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February 6, 2007

Ms Jane Powell
Fernald Site Mgr
DOE-LM-20.1
10995 Hamilton Cleves Hwy
Harrison, Ohio 45030

**RE: COMMENTS - COMPREHENSIVE LEGACY MANAGEMENT AND
INSTITUTIONAL CONTROLS PLAN, VOLUMES I AND II, 2008**

Ms Powell:

Ohio EPA has received DOE's "Comprehensive Legacy Management And Institutional Controls Plan, Volumes I And II, 2008" on November 6, 2007. Ohio EPA has reviewed the report and our comments are enclosed.

If there are any questions, please contact me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

Cc: Tim Fischer, US EPA
Michelle Cullerton, Tetra Tech
Frank Johnston, Stoller

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not yet been approved and may yet influence final restoration activities.

VOLUME II

Section 3.1.1 – Site and OSDF Inspections at the Fernald Preserve

6. Commenting Organization: Ohio EPA Commentor: OFFO

Section: General Pg#: Line#: Code: C

Comment: Ohio EPA expects the inspection process at Fernald to evolve over time to appropriately address those areas of greatest risk and to vary by needs. We are open to modifications as necessary and appropriate. We are interested in testing the currently proposed quarterly inspection of set segments to see if it can effectively address the monitoring needs. Should this system not work, it may be necessary to go back to quarterly site wide monitoring. Below, we recommend the use of infrared spectroscopy to enhance the OSDF monitoring, this may be a way technology can improve and allow modification of the site-wide inspections as well.

The following are OEPA's comments (6-15) on the "revised section" of the Site and OSDF Inspections for the 2008 LMIC and not on the existing text. The revised portion was sent to Ohio EPA from John Homer on December 19, 2007. This is documentation of Ohio EPA comments that were submitted by email on January 9, 2008:

7. Commenting Organization: Ohio EPA Commentor: OFFO

Section: Proposed Path Forward Pg#: 1 Line#: 4th paragraph Code: C

Comment: It is important to note in this section that this is not a static process. It is dynamic in nature and will continue to evolve and be refined as site conditions change. When the site opens to the public this summer, inspection processes and forms may have to be adapted to accommodate those changes.

8. Commenting Organization: Ohio EPA Commentor: OFFO

Section: Site Inspection/*Field Walkdown* Pg#: 2 Line#: 1st paragraph Code: C

Comment: Include an "Equipment Checklist" on the backs of each of the inspection forms. Items would include inspection forms and maintenance logs, maps, GPS, sharpie, flags (yellow + others), cell phone, list of participants cell #s, trash bags.

9. Commenting Organization: Ohio EPA Commentor: OFFO

Section: Site Inspection/*Field Walkdown* Pg#: 2 Line#: 2nd paragraph Code: C

Comment: The suggested distance of 100 feet between transects is unacceptable to Ohio EPA. The absolute maximum distance between parallel transects should be 100 feet. Revise sentences to read, "The distance between transects will be no more than 100 feet, and may be less depending on the number of participants..."

10. Commenting Organization: Ohio EPA Commentor: OFFO

Section: Site Inspection/*Field Walkdown* Pg#: 2 Line#: 3rd paragraph Code: C

Comment: Ohio EPA has several recommendations to improve map usability.

- a) Divide the map into quadrants for better accuracy (something smaller that is easier to handle) as was once done at a previous inspection.
- b) Include a scale and additional landmarks that are easily identifiable such as monitoring wells, fencing, smaller streams and ravines, etc. This would ensure and improve accuracy for the user and the interpreter of findings marked.

- c) A topographic layer could also be helpful. This was originally used on the first inspection and the end decision was to use the aerial, however integrating the two might be helpful.

11. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Site Inspection/*Field Walkdown* Pg#: 2 Line#: 3rd paragraph Code: C
Comment: Suggest using yellow flags, plus other colors to mark various findings. For instance, green for invasives, blue for construction debris, etc. Add to the text that each flag will be dated with a Sharpie. It is Ohio EPA understands that the GPS will be used to the extent possible.

12. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Debrief & Documentation of Findings Pg#: 3 Line#: 1st paragraph Code: C
Comment: The status of action items should also be included in the inspection reports.

13. Commenting Organization: Ohio EPA Commentor: OFFO
Section: FP IC Insp. Form Pg#: Attachment 2 Line#: Code: C
Comment: Add a column for "GPS" coordinates if available.

14. Commenting Organization: Ohio EPA Commentor: OFFO
Section: FP IC Insp. Form Pg#: Attachment 2 Line#: Code: C
Comment: Add under "Access Points" to be inspected:
a) Old North Access Road
b) Roadway access to the north fenceline air monitor

15. Commenting Organization: Ohio EPA Commentor: OFFO
Section: FP IC Insp. Form Pg#: Attachment 2 Line#: Code: C
Comment: Add A8P11 to "Other IC" to be inspected.

16. Commenting Organization: Ohio EPA Commentor: OFFO
Section: FP Maintenance and Repair Form Pg#: Attachment 4 Line#: Code: C
Comment: After the "Location" column, add "GPS?" column.

17. Commenting Organization: Ohio EPA Commentor: OFFO
Section: 3.2.1 Pg#: 3-8 Line#: third paragraph Code: C
Comment: From this section, it appears that procedures were not followed on Cell 2 for 2007. Ohio EPA has not seen the vegetation data for 2007.

18. Commenting Organization: Ohio EPA Commentor: DSW
Section: 3.2.2 Pg#: 3-9 – 3-10 Line#: Code: C
Comment: This section states: "Section 6.0 provides the reporting requirements, and notification and response actions for when flow in the leak detection system exceeds action levels, which could be an indication of a failure in the cap or liner and could pose a threat to human health or the environment. Table 6-1 of the GWLMP outlines these actions in detail."
Section 6.0 never uses the term "action level." Please be consistent in the terminology. Ohio EPA recommends a table in Section 6.2 of the GWLMP which shows the action level and the response action. We further recommend that the table use an absolute

flow rate rather than a relative flow rate, now that the Cells are closed and the acreage should be known (e.g., 240 gpd rather than 20 gpad).

Section 5.0 – Information Management and Public Involvement

19. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 5.0 Pg #: 5-1, 5-5 Line #: Code: C

Comment: The third paragraph on page 5-1 and the first paragraph on page 5-5 about the Administrative Record online are no longer relevant. Unfortunately, the AR was taken offline in 2007 by DOE. Please revise text in this and all other references to viewing the AR using the Internet.

20. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 5.2.2 Pg #: 5-4 Line #: Code: C

Comment: In the 2nd paragraph of this section, add that information on the development and progress of the Visitors Center was provided through quarterly LM briefings and at monthly FCA public meetings.

APPENDIX C – Fernald Preserve Contact Information

21. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Appendix C Pg #: Line #: Code: C

Comment: In Appendix C of the ICP (Fernald Preserve Contact Information) add the web address for US EPA (www.epa.gov) and US FWS (www.fws.gov).

22. Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Appendix C Pg #: Line #: Code: C

Comment: In Appendix C of the ICP (Fernald Preserve Contact Information), add a note that additional state and local contacts can be found in Appendix A (Information Contacts) of Attachment E, the Community Involvement Plan.

ATTACHMENT A – OMMP Aquifer Restoration & Wastewater Treatment

23. Commenting Organization: Ohio EPA Commentor: OFFO

Section: 7.2 Pg#: 7-3 Line#: Code: C

Comment: In the 2006 version of the LMIC, DOE states that any interactions between DOE, US & Ohio EPA regarding the OMMP, will occur through a "review and comment resolution process for the document". Ohio EPA advises to include this information in the 2009 LMIC.

ATTACHMENT B – Post-Closure Care and Inspection Plan

24. Commenting Organization: Ohio EPA Commentor: OFFO

Section: General Pg#: Line#: Code: C

Comment: DOE should implement aerial infrared spectroscopy monitoring of the OSDF to supplement and enhance the quarterly inspection monitoring of the cap. Such imaging could allow for the creation of a long term data base which would facilitate understanding of cap vegetation and moisture dynamics as well as provide early warnings of any potential cap failure. Such monitoring was recently discussed at an LM/Stoller forum at Mound and has previously been discussed for use at Fernald. Ohio EPA would like to see this implemented in future monitoring at Fernald. It is likely this data on a sitewide basis could be very beneficial in vegetation/habitat management.

25. Commenting Organization: Ohio EPA Commentor: OFFO
Section: 11 & 12 Pg#: 11-1 Line#: Code: E
Comment: Section 11, Modification of Post-Closure Plan has been left out of the January 2008 LMIC. Section 12, Community Relations, is currently designated as Section 11. Please revise these sections.

ATTACHMENT C – Groundwater/Leak Detection and Leachate Monitoring Plan, OSDF

26. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: N/A Pg #: N/A Line #: N/A Code: C
Comment: Much of the key information provided by this plan is deeply embedded in text discussion in both the main document and in the appendices. As a result, the end user must wade through large quantities of text discussion to extract basic parameter data important to evaluating facility performance. A quick reference table placed forward in the plan or in an appendix and that shows the values of key parameters on a cell by cell basis (e.g., monitoring indicator parameter monitoring frequencies for the LCS, LDS, HTW, and GMA, Appendix I LCS monitoring frequency, action leakage rates, etc.) is one possible solution.

27. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: 1 Pg #: 1-6 Line #: 9 Code: E
Comment: Change "Pre-Design Investigation and Site Selection Report" to "Pre-Design Investigation and Site Selection Reports."

28. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: 2 Pg #: 2-5 Line #: 25 Code: E
Comment: Change "he laterally" to "the laterally."

29. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: 3 Pg #: 3-1 Line #: 15 Code: E
Comment: Change "monitoring requirements for OSDF" to "monitoring requirements for the OSDF."

30. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: 3 Pg #: 3-7 Line #: 19 Code: C
Comment: This text should be made consistent with the discussion of changes to the monitoring frequency indicated in Appendix B. The text should more clearly indicate what the current monitoring frequency is (at the time that the current version of the GWLMP was prepared). Consistent with Page B-3 of Appendix B, DOE should note that the semiannual monitoring interval is a proposed change that will require agency approval.

31. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: 3 Pg #: 3-8 Line #: 5 Code: C
Comment: The proposal to discontinue the collection of an annual LCS grab sample for analysis of Appendix I and the PCB parameters listed in OAC 3745-27-10 (Appendix I and PCBs) after the common ion study is completed is premature. The annual LCS sample should continue to be analyzed for Appendix I and PCBs until DOE

treatment system evaluation. Was it successful? If not, what future evaluations will be conducted?

38. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: 5 Pg #: 5-2 Line #: 18 Code: C

Comment: Until steady state conditions are demonstrated and a formal statistical monitoring procedure (consistent with the regulations) is in place, Appendix I and PCBs should be analyzed in the LCS so that the full range of potential leachate contaminants is accurately established based on actual monitoring data.

APPENDIX B – Project-Specific Plan for the OSDF Monitoring Program

39. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: App. B Pg #: B-3 Line #: 14 Code: C

Comment: Until steady state conditions are demonstrated and a formal statistical monitoring procedure (consistent with the regulations) is in place, a quarterly monitoring frequency should be maintained. A quarterly frequency is necessary so that the demonstration of steady state conditions, which are a requirement for establishing a statistical procedure, can proceed as expeditiously as possible.

40. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: App. B Pg #: B-10 Line #: N/A Code: C

Comment: The column header for column three of Table 2-4 should be revised to indicate that this proposed frequency has yet to receive agency approval.

41. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: App. B Pg #: B-10 Line #: 32 Code: C

Comment: The text indicates that semiannual samples will be collected from Cell 8 LCS, LDS, HTW, and GMA. This proposed monitoring frequency that has yet to receive Agency approval. Cell 8 has the shortest monitoring record of the eight OSDF cells. Without a definitive demonstration that steady state conditions exist at this cell, it would be premature to reduce the monitoring frequency.

APPENDIX C – Fernald Preserve DQO Monitoring Program for the OSDF

42. Commenting Organization: OEPA Commenter: Geo Trans, Inc.
Section #: App. C Pg #: C-2 Line #: 33 Code: C

Comment: Until steady state conditions are demonstrated and a formal statistical monitoring procedure (consistent with the regulations) is in place, Appendix I and PCBs should be analyzed in the LCS so that the full range of potential leachate contaminants is accurately established based on actual monitoring data.

APPENDIX D – Leachate Management System for the OSDF

43. Commenting Organization: OEPA Commenter: Geo Trans, Inc.
Section #: App. D Pg #: D-7 Line #: 39 Code: E

Comment: Change "that the most of the actions" to "that most of the actions".

44. Commenting Organization: OEPA Commenter: OFFO
Section #: App. D/Figure 5-1 Pg #: Line #: Code: E

Comment: Why was Figure 5-1 removed from this appendix?

APPENDIX E - Selection Process for Site-Specific leak Detection Indicator Parameters

45. Commenting Organization: OEPA Commenter: Geo Trans, Inc.
Section #: App. E Pg #: E-7 Line #: 37 Code: E
Comment: The page numbers in this section should begin with E-1 not E-7.

46. Commenting Organization: OEPA Commenter: Geo Trans, Inc.
Section #: App. E Pg #: E-8 Line #: 19 Code: C
Comment: The bulleted OAC citations are repetitive of the bulleted text in Table 2-1.

47. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: App E Pg #: E-10 Line #: 4 Code: C
Comment: The analysis for the selection of site-specific monitoring parameters discussed in this section utilized a modeling analysis based on assumed benefits of the engineering controls included in the construction of the OSDF. The purpose of leachate detection monitoring is to assess the effectiveness of the OSDF's engineered systems in preventing the release of leachate parameters to groundwater. The logic of eliminating potential leachate detection monitoring parameters based on system performance assumptions are circuitous. Consequently, the resulting site-specific parameter list is of questionable value in assessing the performance of OSDF engineering controls.

ATTACHMENT D – IEMP

General Comment

48. Commenting Organization: OEPA Commenter: DSW
Section #: IEMP Pg #: NA Line #: NA Code: C
Comment: The IEMP is still written as though remediation continues and there are project specific monitoring requirements for remedial activities. Monitoring activities post closure will have elements significantly different than those during cleanup. The IEMP should be rewritten to reflect this change in focus.

Section 1.0 Introduction

49. Commenting Organization: Ohio EPA Commenter: OFFO
Section #: 1.5 Pg #: 1-6 Line #: Code: C
Comment: Section 1.5, in the 2006 LMIC, on "Program Modifications and Revisions" was left out of the revised document. This information needs to be included in the new document to provide the details as to the IEMP's primary focuses and its review and revisions cycle.

Section 2.0 Fernald Preserve Post-Closure Strategy and Organization

50. Commenting Organization: Ohio EPA Commenter: OFFO
Section #: 2.2 Pg #: 2-1 Line #: Code: C
Comment: Part of this paragraph and Figure 2-1 were left out of the January 2008 LMIC, from the June 2006 LMIC. Why did DOE remove this information and more importantly, the text stating "this organization will ensure that Operable Unit 5, EPA, OEPA, and stakeholders requirements will continue to be addressed."

51. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2 Pg #: 2-2 Line #: 3rd bullet Code: E
Comment: Third bullet states that the "cleanup completed with the exception of those areas identified in Figure 2-2." This sentence appears to be incorrect, since there are no areas on Figure 2-2 showing that they are in need of remediation. Please correct.

52. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Section 2/Table 2-1 Pg #: 2-2 Line #: Code: C
Comment: The last paragraph and sentence, with the astrix, is unclear. In both places, the sentence is written in the future tense. In addition, this is the only place in the LMIC that even briefly discusses the contamination that was found between Former Waste Pit 3 and Paddys Run. The LMIC should include how the area will be monitored in the future, considering that DOE's maintenance activity did not completely fix the problem.

Section 3.0 Groundwater Monitoring Program

53. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: 3 Pg #: 3-3 Line #: 1 Code: C
Original Comment#

Comment: This text should be revised to be consistent with similar text on Page 3-55 which states, "If it is determined that high mass removal is not being maintained, or FRL goals are not being achieved, and then the need for operational adjustment will be valuated..."

54. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Section 3 Pg #: 3-5 Line #: first bullet Code: E
Comment: In the first bullet, in the middle is a typo. Instead of "10 5," it should be "10⁻⁵."

55. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: 3 Pg #: 3-13 Line #: N/A Code: C
Original Comment#

Comment: The remediation footprint depicted on Figure 3-3 is deceiving in that it suggests that the remediation system is actively addressing the plume along Willey Road. The aquifer remedy as currently configured produces a stagnation zone along Willey Road that is not being remediated. The footprint should be revised to indicate the presence of this stagnation zone.

56. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: 3 Pg #: 3-19 Line #: 10 Code: C
Original Comment#

Comment: The text discussing the construction of the remediation footprint contradicts the text on page 3-12 and Figure 3-3.

57. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: 3 Pg #: 3-29 Line #: N/A Code: C
Original Comment#

Comment: For clarity, the Table 3-5 title should be revised to indicate that the parameters shown are monitored semiannually and that they apply to IEMP monitoring

69. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.4.3 Pg #:6-13 Line #: na Code: C
Comment: Certain changes to the medium-specific plan will need to be approved by Ohio EPA and/or USEPA. How will DOE ensure that the regulating agencies are informed of substantial changes?

70. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.5.1 Pg #: 6-15 Line #: na Code: C
Comment: The statement, "The programs...are designed to provide continual assessment of air monitoring results with ALARA", is not a well-defined assessment. Is ALARA less than compliance levels or a comparison with background levels? DOE needs to specify its definition of ALARA.

Section 7.0 Program Reporting

71. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 7.2.2 Pg #: 7-2 Line #: last paragraph Code: C
Comment: Part of Ohio EPA's role has been to review and oversee DOE's environmental monitoring programs. From 1995 to 2003, Ohio's independent and split monitoring results were presented in Ohio EPA's Annual Monitoring Report to the Public and in Quarterly Fact Sheets. We are no longer producing these reports. Any data independently collected by Ohio EPA is provided to DOE per their request. Please revise the text accordingly.

72. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: 7 Pg #: 7-3 Line #: 23 Code: C
Original Comment#
Comment: A check of the DOE-LM website in January 2008 revealed that, with regard to groundwater, only operational data for the Fernald Preserve have been posted. According to the text, analytical data will be posted once it has been validated. None of the 2006 SER data, however and no data that had previously been available on the IEMP website (with the exception of the operational data) is available. It does not, therefore, appear that DOE is updating this DOE-LM site in a timely manor.

73. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 7.3.2 Pg #: 7-3 Line #: Code: C
Comment: In the description of the DOE-LM Website, it is important to mention that Fernald data is available to **both** regulatory agencies **and the public** at the website. The website access is not exclusive to the regulators.

Appendix A – The Revised Groundwater Monitoring Approach

74. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: App. A Pg #: A-1 Line #: N/A Code: C
Original Comment#
Comment: The introduction should include a summary of DOE's proposed monitoring changes introduced in this version of the IEMP. Appendix A is entitled "The *Revised* Groundwater Monitoring Approach" when, in fact, this appendix is the same almost verbatim as that found in the previous version of the IEMP.

75. Commenting Organization: OEPA Commenter: GeoTrans, Inc.
Section #: App. A Pg #: A-23 Line #: N/A Code: C
Original Comment#

Comment: Figure A-1 is labeled as showing the "Aquifer *Restoration* Footprint" which contradicts the "Aquifer *Remediation* Footprint" shown in Figure 3-3. Also, the footprint shown on Figure A-1 is described in the text as the "Waste Storage Area Phase II footprint." Comparison with the particle tracking results provided in that report, however, indicate that Figure A-3 inaccurately represents the area being remediated.

Specifically, it does not indicate the stagnation zone along Willey Road or the stagnation zone between the South Field and Waste Storage Area modules. Figure A-1 should be revised to correctly indicate the Waste Storage Area Phase II footprint.

APPENDIX B – Surface Water Final Remediation Level Exceedances

76. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix B Pg #: B-1 Line #: Code: C

Comment: The second line of paragraph 1 refers to "Section 4.4.2.3, a limited number of constituents has been detected above their respective FRLs at several surface water sample locations." Your reference is incorrect and needs to be corrected.

APPENDIX C – Dose Assessment

77. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 2.1 Pg #: C-1 Line #: na Code: C

Comment: Although not specifically cited in the ARARs DOE has historically included a dose assessment from exposure to radon-222. If boundary concentrations of radon-222 are distinguishable from background then a dose assessment should be included as has been done historically.

APPENDIX D – Natural Resource Monitoring Plan

78. Commenting Organization: OEPA Commentor: DSW
Section #: 1.0 Appendix D, NRM Plan Pg. #: D-1 Line #: NA Code: C

Comment: Absent from this section and the rest of this document are detailed monitoring requirements for the mitigated wetlands under 401/404. These requirements differ from those required under the NRRDPs. Note that there is outstanding disagreement between DOE and OEPA on requirements for monitoring, consequently no completion report for an NRRDP was approved by OEPA.

79. Commenting Organization: OEPA Commentor: DSW
Section #: 2.2 Appendix D, NRM Plan Pg. #: D-3 Line #: NA Code: C

Comment: This section states, "As stated in Section D.1, this monitoring will be summarized in the site environmental reports. Detailed results of restoration monitoring will be provided annually in the appendix to the site environmental report." No such appendix of summary exists in the annual site environmental report (ASER). Section 7.0 of the 2006 ASER provides a background narrative on the site natural resources but neither the ASER nor its appendices provide a monitoring report. An annual monitoring report must be provided in either the ASER or the LMICP.

80. Commenting Organization: OEPA Commentor: DSW
Section #: 2.2 Appendix D, NRM Plan Pg.#: D-3 Line #: NA Code: C
Comment: This section makes several references to agreements made between the NRTs and DOE. These are inappropriate and should be deleted, due to litigation issues are currently ongoing.

81. Commenting Organization: OEPA Commentor: DSW
Section #: 4.1.1 Appendix D, NRM Plan Pg.#: D-11 Line #: Code: C
Comment: DOE agreed to perform a post closure survey of Sloan's Crayfish on site. We have yet to see this performed. OEPA agreed to assist DOE in this survey and still expects it to be performed. Please include this in your plans for the Sloan's Crayfish.

82. Commenting Organization: OEPA Commentor: DSW
Section #: 4.4.2 Appendix D, NRM Plan Pg.#: D-11 Line #: NA Code: C
Comment: In this section, addressing monitoring for "mitigated wetlands" (as opposed to restoration wetlands), DOE states that "The requirement for wetland areas are typically for 3 years following completion, instead of just one as with the other restoration areas." Monitoring for mitigated wetlands has never been 3 years (and never one year for restoration wetlands). Refer to our comment number 3 on the "Transmittal Of The Change Pages To The Comprehensive LMIC Plan, Rev 1," dated February 21, 2007. In addition, refer to comment numbers 1 and 2 on the "Transmittal of the Statement of Completion for the Borrow Area," dated November 29, 2006. For more examples, check comment number 7 on the "Draft Wetland Mitigation Project Phase II NRRDP," dated October 22, 2003.

ATTACHMENT E – Community Involvement Plan

83. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Acronyms and Abbreviations Pg #: v Line #: Code: C
Comment: Add FLHP (Fernald Living History Project) and FCA (Fernald Community Alliance) to your list of acronyms.

84. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.1 Pg #: 4-3 Line #: Code: C
Comment: Add the successful Fernald Envoy program to the Highlights of Community Involvement.

85. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.1.1 Pg #: 5-1 Line #: Code: C
Comment: Change text to read, "LM held public meetings quarterly for the first year post-closure..."

86. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.2 and 5.4 Pg #: 5-3 Line #: Code: C
Comment: Since the Administrative Record (AR) will not be available on the Internet, both sections 5.2 and 5.4 of the CIP need to be clear in how the AR will now be made available to the public. Please revise text in these and all other references to viewing the AR using the Internet.

87. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.6 Pg #: 5-3 Line #: Code: C
Comment: In what way was the public notified of their opportunity to comment on revisions to the LMICP?

88. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix A Pg #: A-3 Line #: Code: C

89. Comment: Add Tim Fischer as the US EPA contact for Fernald. Add the website www.epa.gov to their contact information.

90. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Appendix A Pg #: A-3 Line #: Code: C
Comment: Add emergency contact information to this page.