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John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

July 17, 2014

Ms. Gwendolyn Hooten
Fernald Preserve Site Manager
DOE-LM-20.2
10995 Hamilton Cleves Highway
Hamilton, Ohio 45030

**RE: COMMENTS – FERNALD PRESERVE 2013 SITE ENVIRONMENTAL REPORT,
Dated May 2014**

Dear Ms. Hooten:

Ohio EPA has received and reviewed the "Fernald Preserve 2013 Site Environmental Report", dated May 2014. Ohio EPA's comments are enclosed.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

A handwritten signature in black ink, appearing to read "TAS", written over a light blue horizontal line.

Thomas A. Schneider
Fernald Preserve Project Manager
Division of Environmental Response and Revitalization
Federal Facilities Section

TAS/tb

cc: Tim Fischer, U.S. EPA
Bill Hertel, Stoller Corporation
Matt Justice, DDAGW, Ohio EPA-SWDO

**OHIO EPA COMMENTS ON THE FERNALD PRESERVE
2013 SITE ENVIRONMENTAL REPORT
DATED MAY 2014**

Commenting Organization: Ohio EPA

Section: General Pg#: Line#:

Comment: As discussed at our 7/16/14 meeting, Ohio EPA believes it would be appropriate and useful to include a summary or spreadsheet of the quarterly OSDF/site inspection results within the SER. The format for inclusion, electronic or paper, can be discussed over the coming months along with any proposed changes to electronic format for paper reduction.

Commenting Organization: Ohio EPA

Section: Summary Report , Section 6.2 Pg#: 94 Line#:

Comment: In the 3rd sentence of the first paragraph add "contaminated debris" to the list of what is documented in the site inspections.

Commenting Organization: Ohio EPA

Section: Figure 4 Pg#: Line#:

Comment: Ohio EPA requests re-evaluation of the depth scale on the Figure 4 hydrostratigraphic cross-section. While the figure referenced on page 13 indicates approximately 75 feet of unconsolidated material beneath the former production area, the OU-5 RI report indicates approximately 200 feet of unconsolidated material beneath the former production facility.

Commenting Organization: Ohio EPA

Section: Attachment A.2/Section A.2.1.1.1 Pg#: Line#:

Comment: In regards to the mention of uranium ground water concentration increases at various direct-push sample locations (page 3), Ohio EPA requests clarification of whether observed increases correlate with sample turbidity. A positive correlation could indicate that concentration increases are at least partially attributable to sample turbidity.

Commenting Organization: Ohio EPA

Section: Attachment A.2/Section A.2.1.1.1 Pg#: Line#:

Comment: Ohio EPA recommends that future reports provide justification for filtering direct-push ground water samples through a relatively large, 5 micron filter, prior to uranium sample collection. A smaller 0.45 micron filter is more typical of environmental ground water sampling. The turbidity of filtered direct-push sample remains excessively high in many cases, above 999 NTUs (Tables A.2-4 through A.2-28). Has consideration been given to the potential for turbid sample to bias sample concentration high?

Commenting Organization: Ohio EPA

Section: Attachment A.2/Section A.2.1.2.3 Pg#: Line#:

Comment: Please clarify the apparent discrepancy between the page 7 reference to increasing uranium at multi-channel monitoring well 83124_C4 and map Figure A.2-4. According to the map legend, the concentration was steady, rather than increasing.

Commenting Organization: Ohio EPA

Section: Appendix D Pg#: Line#:

Comment: The presented monitoring data, along with casual observations of the on-site prairies, suggest native species may be decreasing in abundance and diversity while invasive/non-native species are expanding in the planted prairies. Multiple factors may be at work, but it is likely that the lack of timely burning/mowing may be driving this transition. Ohio EPA would like to add this topic for discussion at an upcoming technical workgroup meeting.

Commenting Organization: Ohio EPA

Section: Appendix D Pg#: Line#:

Comment: A discussion regarding the success or lack of success in establishment for the various species within the seed mix would be useful in evaluating future seed mixes on site and at other restoration projects. Ohio EPA would like to add this topic for discussion at an upcoming technical workgroup meeting.

Commenting Organization: Ohio EPA

Section: Appendix D, Table D-24 Pg#:D-33 Line#:

Comment: *Solidago canadensis* is repeated within this table. It is likely the proper name for one of these is *Solidago rigida*. Correction of the table should improve the score of this area.

Commenting Organization: Ohio EPA

Section: Appendix D, Figures D-3A to D-3Y Pg#: Line#:

Comment: The hydrographs may be more useful at this point if they included multiple years of data on the same graph. This would allow for evaluation of the wetland function over multiple seasonal cycles to see if there are any long term trends in terms of hydrology that need addressed. Single year based data will be highly subject to the variations in weather and thus less useful for interpretation.