



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

August 12, 2014

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

**RE: COMMENTS – FERNALD PRESERVE SITE PADDYS RUN STREAMBANK  
STABILIZATION, dated JULY 2014**

Dear Ms. Hooten:

Ohio EPA has received and reviewed the "Fernald Preserve Paddys Run Streambank Stabilization", dated July 2014. Ohio EPA's comments are enclosed.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas A. Schneider for".

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

TAS/tb

Enclosure

ec: Tim Fischer, U.S. EPA  
Bill Hertel, Stoller Corporation

**OHIO EPA COMMENTS ON THE FERNALD PRESERVE  
SITE PADDYS RUN STREAMBANK STABILIZATION  
DATED JULY 2014**

Commenting Organization: Ohio EPA

Section: Specs, 02100; 1.3 Pg#: 1 Line#:

Comment: Considering the drawings do not include where silt fence will be installed or how the coffer dam will be constructed, please provide submittals D & F to Ohio EPA for review upon receipt.

Commenting Organization: Ohio EPA

Section: Specs, 02100; 1.4 Pg#: 2 Line#:

Comment: Any temporary construction entrances should be removed and restored following completion of the project.

Commenting Organization: Ohio EPA

Section: Specs, 02100; 2.1B Pg#: 2 Line#:

Comment: Any erosion matting used must be 100% biodegradable and not include any monofilament line that could entrap herpto or avian fauna.

Commenting Organization: Ohio EPA

Section: Specs, 02100; 3.3C Pg#: 4 Line#:

Comment: Final permanent stabilization should include seeding with the permanent seed mix per the restoration design.

Commenting Organization: Ohio EPA

Section: Specs, 02200; 3.1D Pg#: 5 Line#:

Comment: Any discharge to surface per this paragraph may not increase turbidity of any receiving stream or cause erosion in such stream.

Commenting Organization: Ohio EPA

Section: Specs, 02200; 3.2C Pg#: 6 Line#:

Comment: Please add to this paragraph that in addition to the pre-designated protected trees, the subcontractor shall make every reasonable attempt at minimal impact to the flora and fauna in general.

Commenting Organization: Ohio EPA

Section: Specs, 02200; 3.10A Pg#: 10 Line#:

Comment: Ohio EPA disagrees that Fernald was ever designated unlimited use/unlimited exposure. There certainly are restrictions in place to restrict land use in remediated areas on the basis of exposure to soils. This paragraph mischaracterizes the site. It is not just a matter of policy that soils don't leave the site but is a part of the Record of Decision.

Commenting Organization: Ohio EPA

Section: Specs, 02200; 3.10A Pg#: 10 Line#:

Comment: There is no discussion of a rad tech participation in the excavation. It would seem prudent due to the location and past practices that if debris or waste of any kind is encountered that work stop until such time as a rad tech can confirm the absence of contaminated debris.

Commenting Organization: Ohio EPA

Section: Specs, 02200; 3.10A Pg#: 10 Line#:

Comment: There is no discussion radioactive contaminated debris in this report. Subcontractors and each of their employees have the right to be fully aware of materials that may be present. Anyone involved in moving dirt at Fernald should be made aware of the heightened potential due to the location of this streambank project.

Commenting Organization: Ohio EPA

Section: Drawings Pg#: Line#:

Comment: Neither the drawings, nor the specifications acceptably address the upstream end of the project tie into the existing grade control structure. In fact it appears the plan moves the stream channel off the top of the existing structure with part of the channel bottom on the control structure and part off. This seems a recipe for problems. Additional details should be provided to clarify how the coffer dam, stabilization operations and final configuration will work in conjunction with the existing gradient control structure.

Commenting Organization: Ohio EPA

Section: Drawings, Planting Plan Pg#: Line#:

Comment: Ohio EPA recommends the addition of prairie cordgrass (*Spartina pectinata*) to the grass seed mix and an increase in the rate of switch grass seed and decrease in canada wild rye. Ohio EPA recommends the addition of swamp milkweed (*Asclepias incarnata*) to the form mix. Considering the wet conditions of the areas being seeded it would seem important to include sedges in the mix. Please evaluate appropriate sedges to add to the seed mix.