



Department of Energy
Washington, DC 20585

September 11, 2014

Mr. David Seely
Remedial Project Manager
U.S. Environmental Protection Agency
Region 5 (SR-6J)
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Mr. Thomas A. Schneider
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402

Dear Mr. Seely and Mr. Schneider:

SUBJECT: Transmittal of the Final Paddys Run Streambank Stabilization Design and Ohio EPA Comment Responses

The purpose of this letter is to transmit the final design and specifications for the Paddys Run Streambank Stabilization project. The design and specifications have been revised pursuant to internal review and comments received from Ohio EPA on August 8, 2014. Draft responses to the comments were discussed during a meeting with Ohio EPA on August 21, 2014 and the revised response to comments is included with this submittal. Drawings and specifications have revisions noted. Most specification revisions include redline changes that highlight text changes. Sections 01025, 01300, and 02200 were issued as new revisions.

A construction subcontractor has been selected for this project and fieldwork is anticipated to begin the second week in September. If you have any questions or require additional information, please call me at (513) 648-3333. Please send any correspondence to:

U.S. Department of Energy
Office of Legacy Management
10995 Hamilton-Cleves Hwy.
Harrison, OH 45030

Sincerely,

Gwendolyn N. Hooten
2014.09.11 12:41:07
-06'00'

Gwendolyn N. Hooten
Fernald Preserve Site Manager
DOE-LM-20.2



Mr. David Seely
Mr. Thomas Schneider
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cc:

K. Reed, DOE

D. Shafer, DOE

B. Hertel, Stoller

J. Homer, Stoller

M. Murphy, USEPA-V, A-18J

Project Record File FER 115.02.05(A) (thru B. Irvine)

Administrative Records (thru B. Irvine)

**Reponses to Ohio EPA Comments
Paddys Run Streambank Stabilization
August 2014**

Specific Comments:

1. Commenting Organization: Ohio EPA

Section: Specs, 02100; 1.3 Page :1

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.

Response: Agree.

Action: Submit construction erosion and sediment control plan and list of materials upon receipt.

2. Commenting Organization: Ohio EPA

Section: Specs, 02100; 1.4 Page: 2

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

Response: DOE agrees that temporary construction entrances shall be removed and restored. The upstream access point that is located at the low flow channel inlet will be constructed as a permanent access point to provide safe access for monitoring and maintenance of the project area.

Action: Add the following after the last sentence in Spec 02100; 1.4 D: "Temporary construction entrances shall be removed and restored upon project completion." Revise Sheet 3 to show permanent access point.

3. Commenting Organization: Ohio EPA

Section: Specs, 02100; 2.1B Page: 2

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

Response: Agree.

Action: Add the following after the last sentence in Spec 02100; 2.1B: "Erosion blankets shall be 100% biodegradable."

4. Commenting Organization: Ohio EPA

Section: Specs, 02100; 3.3C Page: 4

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

Response: Agree.

Action: Revise Spec 02100; 3.3C by inserting “and permanent seeding” between “grading” and “per.”

5. Commenting Organization: Ohio EPA

Section: Specs, 02200; 3.1D Page: 5

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

Response: Spec 02100 addresses project sediment and erosion control measures. Best Management Practices shall be used to minimize sedimentation and erosion into streams.

Action: Add the following after the last sentence in Spec 02200; 3.1D: “Turbidity into receiving streams will be minimized pursuant to Specification 02100.”

Add a new requirement in Spec 02100; 3.2 that states the following: “Increased water turbidity in Paddys Run shall be minimized. Turbid water from construction areas will not be pumped directly into Paddys Run, but rather redirected over land. Turbidity will be observed by the Contractor at a point 200 feet downstream of the project area. Immediate action will be required if increased turbidity is observed.”

6. Commenting Organization: Ohio EPA

Section: Specs, 02200; 3.2C Page: 6

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.

Response: Agree.

Action: Add the following after the last sentence in Spec 0200; 3.2C: “The subcontractor shall make every reasonable effort to minimize impacts to flora and fauna.”

7. Commenting Organization: Ohio EPA

Section: Specs, 02200; 3.10A Page: 10

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.

Response: DOE agrees that Fernald was not designated unlimited use/unlimited exposure. The intent of the section was to identify the project area as non-controlled, not unrestricted.

Action: Replace the first three sentences of Spec02200; 3.10A with the following: "The Fernald Site has been remediated pursuant to CERCLA. The Record of Decision (ROD) for Operable Unit 5 (environmental media including soil) established final remediation levels for the site that are protective of human health and the environment, based on final land use as an undeveloped park. The OU5 ROD designates the site as restricted use, and requires an Institutional Control Plan that prohibits residential and agricultural activities and unauthorized use of the site. The *Fernald Preserve Legacy Management and Institutional Controls Plan* establishes site institutional controls to ensure remedy protection. Excavated soil must remain on property. Therefore, the subcontractor shall relocate all soils that are not re-used as backfill to an on-property staging area."

8. Commenting Organization: Ohio EPA

Section: Specs, 02200; 3.10A Page: 10

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.

Response: Agree. An onsite Radiological Control Technician was present for pre-bid tours and will participate in the pre-construction conference and provide periodic field oversight. An overview of soil remediation activities will be included as part of the pre-construction conference. Subcontractor personnel will also be briefed to all safety issues (including radiological issues) during the project kickoff and daily tailgate safety meetings, etc.

Action: Replace the third and fourth sentences in Spec 02200; 3.10B with the following: "Subcontractor personnel shall be briefed to the *Fernald Preserve Procedure for Suspect Material or Debris Discoveries* (LMS/FER/S02767-3.0). A Radiological Control Technician will be available to investigate debris or other suspect material discoveries."

9. Commenting Organization: Ohio EPA

Section: Specs, 02200; 3.10A Page: 10

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.

Response: See Response to Comment No. 8 above.

Action: See Action for Comment No. 8 above.

10. Commenting Organization: Ohio EPA

Section: Drawings Page: NA

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.

Response: DOE agrees that the existing gradient control structure must be left intact. The exact location of the structure is located between Station 0+25 and 0+55. Sheet 5 indicates that no stream relocation will occur in this area.

Action: The existing gradient control structure will be identified on the drawings and a note shall be added to Sheet 3 stating that the existing structure shall not be damaged by the installation of the cofferdam, diversion channel or project access.

11. Commenting Organization: Ohio EPA

Section: Drawings, Planting Plan Page: NA

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.

Response: Most seeding areas will require a mesic mix instead of a wetland mix. Wetland conditions are anticipated in portions of the swale area that will need to be reclaimed. The site wetland seed mix (attached) will be added to Sheet 9. This seed mix includes Virginia wild rye in place of Canada wild rye, prairie cordgrass, swamp milkweed and several sedges.

Action: Add the attached site wetland seed mix to Sheet 9.

Wetland Grass Mix

Scientific Name	Common Name	lb/ac
<i>Andropogon gerardii</i>	BIG BLUESTEM	3
<i>Calamagrostis canadensis</i>	CANADA BLUEJOINT	0.25
<i>Echinochloa crusgalli</i>	BARNYARD GRASS	1
<i>Elymus virginicus</i>	VIRGINIA WILD RYE	10
<i>Panicum virgatum</i>	SWITCH GRASS	0.5
<i>Spartina pectinata</i>	PRAIRIE CORD GRASS	2

Wetland Sedge, Rush and Forb Mix

Scientific Name	Common Name	oz/acre
<i>Asclepias incarnata</i>	SWAMP MILKWEED	3
<i>Aster novae-angliae</i>	NEW ENGLAND ASTER	1
<i>Carex cristatella</i>	CRESTED SEDGE	0.5
<i>Carex frankii</i>	FRANK'S SEDGE	1
<i>Carex hystericina</i>	PORCUPINE SEDGE	1
<i>Carex lurida</i>	BOTTLEBRUSH SEDGE	1.5
<i>Carex vulpinoidea</i>	FOX SEDGE	0.5
<i>Desmodium canadense</i>	CANADA TICK-TREFOIL	3
<i>Eupatorium maculatum</i>	SPOTTED JOE-PYE WEED	0.5
<i>Eupatorium perfoliatum</i>	COMMON BONESET	0.5
<i>Helianthus grosseserratus</i>	SAWTOOTH SUNFLOWER	1.5
<i>Hibiscus laevis</i>	HALBERD-LEAVED ROSE-MALLOW	3
<i>Juncus torreyi</i>	TORREY'S RUSH	0.25
<i>Liatris spicata</i>	SPIKED BLAZING-STAR	1.5
<i>Lobelia cardinalis</i>	CARDINAL-FLOWER	0.25
<i>Lobelia siphilitica</i>	GREAT BLUE LOBELIA	0.25
<i>Mimulus ringens</i>	COMMON MONKEY-FLOWER	0.25
<i>Pycnanthemum tenuifolium</i>	NARROW-LEAVED MOUNTAIN-MINT	0.5
<i>Sagittaria latifolia</i>	COMMON ARROWHEAD	1
<i>Schoenoplectus tabernaemontani</i>	SOFT-STEMMED BULRUSH	1
<i>Scirpus atrovirens</i>	GREEN BULRUSH	0.25
<i>Sparganium eurycarpum</i>	GIANT BUR-REED	1
<i>Verbena hastata</i>	BLUE VERVAIN	0.5
<i>Veronicastrum virginicum</i>	CULVER'S-ROOT	0.25