



**Department of Energy
Office of Legacy Management**

August 13, 2007

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V-5HSF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

Dear Mr. Saric and Mr. Schneider:

SUBJECT: Transmittal of the June 2007 Fernald Site Inspection Checklist

The purpose of this letter is to transmit the completed checklist for the June 2007 Fernald Site quarterly inspection. A map illustrating the findings was prepared and is included with this report. The inspection was conducted with participation from the Ohio Environmental Protection Agency (OEPA), Tetra Tech, and Geosyntec. Responses to OEPA comments on the March 2007 Site Inspection Checklist are also enclosed.

The June 2007 inspection was the second formal site inspection conducted at Fernald as directed by the Comprehensive Legacy Management and Institutional Controls Plan (LMICP 2006). The inspection began on Tuesday, June 26 and was completed on Thursday, June 28. Note that the On-site Disposal Facility (OSDF) cap has a separate inspection and reporting process.

No signs of unauthorized use were observed. Institutional controls appeared to be functioning. Access points, gates, fencing, signs, and other infrastructure seemed to be secure and in good condition. Roads, parking lots and walkways were generally in good condition. Restored areas are progressing as planned. However, a number of findings were observed during the site walk down. Documentation of these findings is discussed in more detail below.

The documentation of site inspection findings is an evolving process. For the March 2007 inspection, all field observations were consolidated and labeled on a site map. Identified items were prioritized by both a color-coding system (red or black text) and by the designation of a "Priority Maintenance Zone" that extended along the paved road to the future Visitors Center. This process proved useful for maintenance personnel to ensure that findings are addressed. However,

2597 B 3/4 Road, Grand Junction, CO 81503	<input type="checkbox"/>	3610 Collins Ferry Road, P.O. Box 880, Morgantown, WV 26507
626 Cochrans Mill Road, P.O. Box 10940, Pittsburgh, PA 15236	<input type="checkbox"/>	1000 Independence Ave., S.W., Washington, DC 20585
11025 Dover St., Suite 1000, Westminster, CO 80021	<input type="checkbox"/>	10995 Hamilton-Cleves Highway, Harrison, OH 45030
955 Mound Road, Miamisburg, OH 45342	<input type="checkbox"/>	232 Energy Way, N. Las Vegas, NV 89030

REPLY TO: Harrison Office

Mr. James A. Saric
Mr. Thomas A. Schneider
Page 2

as findings were compiled for the June 2007 inspection, it became clear that a revised approach is needed.

Several revisions to the site inspection map were made. First, an enhanced prioritization process was developed that provides a better means of addressing corrective actions. Items that require immediate attention are labeled in red. Maintenance items that will be addressed as time permits are labeled in blue. Some findings require no further action, such as vehicle ruts in established fields. These items are labeled in green. Items that have been addressed are highlighted as well, with a black box around white text.

Second, two types of findings previously identified on the March 2007 map, were not labeled on the enclosed June 2007 inspection map. Thistle observations were noted across the site in both March and June. Field personnel have worked daily throughout the spring to control the spread of thistle and other noxious weeds. All areas site-wide have been systematically addressed as part of the site noxious weed control program. Herbicide application and physical clearing take place regardless of whether the noxious weed was identified during a site inspection. Labeling of individual thistle locations provided no benefit to this process. Because of this, thistle observations were not included on the June site inspection map. Likewise, field personnel do not use the site inspection map to determine the location of debris. Instead, a flagging system has been developed for the site. Inspection participants used yellow pin flags ("debris flags") to identify locations of debris in the field. The site Radiological Control Technician uses these flags to locate, identify, analyze, document, and subsequently dispose of debris. Since this process is in place, individual debris locations are not needed on the site inspection map.

Corrective actions continue. As stated above, thistle and other noxious weeds have been physically removed, trimmed, and/or treated with herbicide by a licensed herbicide applicator. Most areas were "spot sprayed" with a 2-4, D broad leaf herbicide (Triplet). Prairie areas in Paddys Run West, the South Field, east of the Borrow Area, and OSDF cell cap 1 were boom sprayed with Plateau herbicide. Plateau is protective of most native grasses and forbs, so it is ideal for noxious weed control in established prairies. All phragmites/reed canary grass locations were hand swiped with a glyphosate-based herbicide that is safe for use in wetlands (Rodeo). Overall, herbicide applications proved very effective. Mowing and trimming is also used to suppress thistle spread.

Goose control efforts include the use of visual deterrents and shaking eggs to prevent population growth. All such activities are in compliance with a 2007 Goose Damage Permit issued through the Ohio Department of Natural Resources. Eggs from over 60 goose nests were shaken following the March site inspection. This effort was very effective at limiting the reproduction of geese across the site.

For erosion areas, subcontractor support is being procured to design and implement effective and permanent erosion control measures. Erosion areas will be addressed site-wide, with prioritization given to the Waste Pits Area, the Former Production Area, the Southern Waste Units, and the Borrow Area. Area-specific designs will be provided separately.

A second part of the quarterly site inspection includes interviews of local residents and businesses, and a document review. The interviews are documented on the attached interview forms. In general, the local residents interviewed are pleased with the progress at the Fernald Site and have

Mr. James A. Saric
Mr. Thomas A. Schneider
Page 3

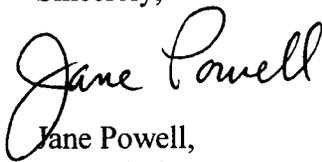
no concerns. Continued communication with the contracted site manager and DOE is desired. Interviews with the local sheriff and fire departments indicated that all is going as expected at the site.

In addition, interviews were conducted with the Contracted Site Manager, the Aquifer Restoration Manager, and the Information Management Manager on site. Their interview forms are also included. A few items of concern were discussed and it was noted that those items are being addressed.

The next quarterly site inspection will occur in September 2007. Field investigations will focus on continued documentation of the findings described above.

If you have any questions or require any additional information, please call me at (513) 648-3148.

Sincerely,



Jane Powell,
Fernald Site Manager
DOE-LM-20.1

Enclosure

cc w/ enclosure:

M. Cullerton, Tetra Tech.
M. Murphy, USEPA-V, A-18J
J. Reising, DOE-EM
T. Schneider, OEPA (three copies of enclosure)
M. Shupe, HSI GeoTrans
Project Record File FER030.1(A) (thru W. Sumner)
Administrative Records (thru W. Sumner)

cc w/o enclosure:

J. Homer, Stoller
F. Johnston, Stoller
L. McHenry, Stoller

Fernald Site Area Post-Closure Inspection Checklist

Document 6767

Date of Inspection: June 26 – 28, 2007

Weather Conditions: Sunny/PtSunny/Cloudy/PtCloudy/Rain

Time of Inspection: 9:00 AM to 4:00 PM

Temperature: Range from 66 to 93⁰F

Inspection By: SM Stoller, OEPA, Tetra Tech, Geosyntec

Inspection Component	Condition A* or U*	Comments	Corrective Action(s) Proposed	Reference Source
I. Disturbance and Use of Fernald Site				
1A. Inspect access points to ensure that site restrictions and contact information are clearly posted.	A			LMICP
1B. Ensure that any perimeter gates/fences/barriers are in proper working condition.	A			"
1C. Visually inspect interior and perimeter areas to ensure that no unauthorized use or disturbance is occurring.	A			"
1D. Note any change in adjacent off-property land use.	A			"
1E. Visually inspect site wetlands to ensure no dredge/fill or other type of disturbance is occurring.	A			Clean Water Act
1F. Visually inspect restored areas to ensure that prohibited noxious weeds are not present.	U	Thistle in various areas across site. Phragmites identified along Paddys Run, near Visitors Center, in A IPI wetland, and north pines.	Herbicide application to thistle across the site occurred between May and July 2007. Phragmites was treated with a water-safe herbicide in July 2007. Trimming and mowing of noxious weeds is on-going.	OAC
1G. Visually monitor Paddys Run to ensure disturbance of Sloan's crayfish habitat is not occurring.	A			
1H. Visually monitor along Paddys Run corridor to ensure disturbance of Indiana Bat habitat is not occurring.	A			Endangered Species Act
1I. Visually inspect site for excessive erosion.	U	Erosion is occurring in the waste pits area, southern waste units, and in various locations around the production area and borrow area.	A subcontractor will be hired to complete a scope of work which includes design and repair of significant erosion areas.	LMICP
1J. Annually verify that all Deed Restrictions and other Real Estate use restrictions are in place and are applicable.				LMICP
2. Prevent Human and Environmental Exposure to Residual Contaminants				
2A. Visually inspect infrastructure supporting Aquifer Remedy to ensure no unauthorized access or disturbance is occurring.	A			LMICP
2B. Visually inspect perimeter areas to verify that prohibited activities (e.g., digging, soil removal, swimming) are not occurring on Fernald site.	A			"

*A = Satisfactory *U = Unsatisfactory (comments and identification on site map required)

Fernald Site Area Post-Closure Inspection Checklist

Document 6767

Date of Inspection: June 26 – 28, 2007

Weather Conditions: Sunny/PtSunny/Cloudy/PtCloudy/Rain

Time of Inspection: 9:00 AM to 4:00 PM

Temperature: Range from 66 to 93⁰F

Inspection By: SM Stoller, OEPA, Tetra Tech, Geosyntec

Inspection Component	Condition A* or U*	Comments	Corrective Action(s) Proposed	Reference Source
2C. Visually inspect uncertified areas to ensure no digging, disturbance or tampering with signs is occurring.	A			"
2D. Visually inspect access control grating on the Main Drainage Corridor 60-inch culvert.	A			
2E. Annually (following harvest) inspect soil cover over outfall line to ensure sufficient soil cover (30 inches) is present.	N/A			
3. Information Management				
3A. Verify that site information is available to the public and other stakeholders as planned.	A	A great deal of information about the Fernald Preserve is available to the public in a variety of ways such as publications, the Reading Room, website, bi-weekly emails, community meetings, fact sheets, a community telephone number, etc.		LMICP
3B. Verify that information on site inspections and maintenance is readily available.	A	Information about the Fernald Preserve is available in the Reading Room, by request, at public meetings, on scheduled tours, speaking engagements, etc.		LMICP
3C. Verify that requests for site information are being addressed and fulfilled as planned.	A	Any requests or simple questions are handled as soon as possible with a goal of a 48-hour turnaround. Requests and inquiries are documented.		LMICP
3D. Verify that as-built drawings and information on OSDF contents and design are readily available.				LMICP
4. Site Interviews				
4A. Contracted Land Manager – Identify any unusual occurrences or problems at Fernald site.	U	We have had on occasion trespassing onto the site.		LMICP
4B. Site Information/Data Manager – Ensure site data is available and information is being managed as planned.	A	ASER was submitted on time. Temporary servers were used as planned. Local server backups are being performed regularly. CAWWT wireless connectivity is stable. There were two outages with connectivity at GJO.		"

*A = Satisfactory *U = Unsatisfactory (comments and identification on site map required)

Fernald Site Area Post-Closure Inspection Checklist

Document 6767

Date of Inspection: June 26 – 28, 2007

Weather Conditions: Sunny/PtSunny/Cloudy/PtCloudy/Rain

Time of Inspection: 9:00 AM to 4:00 PM

Temperature: Range from 66 to 93°F

Inspection By: SM Stoller, OEPA, Tetra Tech, Geosyntec

Inspection Component	Condition A* or U*	Comments	Corrective Action(s) Proposed	Reference Source
4C. Aquifer Restoration Manager – Verify that Aquifer remediation is progressing as planned and identify any unusual occurrences	A	Aquifer remediation has progressed as planned. The well field was shut down in June to allow aquifer levels to rebound so that uranium in the aquifer could be remobilized.		"
4D. Other staff as appropriate – Identify any problems or site issues.	N/A			"
4E. Hamilton County/Butler County Sheriff – Identify any concerns or issues.	A	There are no concerns.		"
4F. Ross/Crosby Township Police/Fire Departments – Identify any concerns or issues.	A	The interview was of a Morgan Township fireperson. No comment. Everything is as expected.		"
4G. Ohio "Call Before You Dig" Program Office – Ensure Fernald site information is properly noted to prevent unauthorized excavation on the site.	N/A	DOE's voting membership has not yet been set up.		"
4H. Stakeholder Groups (e.g., FRESH, Post-Closure Coalition) – Identify any concerns or problems.	A	Everything is going well. Stakeholder is looking forward to the opening of the Visitors Center.		"
4I. Adjacent landowners.	A	The neighbor is very appreciative of the cleanup.		

*A = Satisfactory *U = Unsatisfactory (comments and identification on site map required)

FERNALD PRESERVE INTERVIEW RECORD

Name of Individual Contacted: Frank Johnston

Time: 7:56 AM

Date: 7-30-07

Title: Site Manager

Organization: Stoller

Street Address: 10995 Hamilton-Cleves Hwy

Telephone No: 513-648-5294

City, State, Zip: Harrison, OH 45030

Fax No:
E-Mail Address: frank.johnston@lm.doe.gov

Type: Telephone Other Visit - Location of Visit:

Contact Made By (Name): Lisa McHenry

Title: Restoration Ecologist

Organization: Stoller

Summary Of Conversation

We have had on occasion evidence of trespassing. An incident involving spreading survey ribbon along several roads and the ramming of the front gate occurred in May. In addition, an ATV was spotted on the property. Security patrol times have been adjusted in response.

FERNALD PRESERVE INTERVIEW RECORD

Name of Individual Contacted: Susan Marsh		Time: 9:01 AM	Date: 7-30-07
Title: Information Management Manager		Organization: Stoller	
Street Address: 10995 Hamilton-Cleves Hwy City, State, Zip: Harrison, OH 45030		Telephone No: 513-648-7544 Fax No: E-Mail Address: susan.marsh@lm.doe.gov	
Type: <input type="checkbox"/> Telephone <input checked="" type="checkbox"/> Other <input type="checkbox"/> Visit - Location of Visit:			
Contact Made By (Name): Lisa McHenry			
Title: Restoration Ecologist		Organization: Stoller	
Summary Of Conversation			
<p>The ASER, which is a heavy user of IT resources and electronic information, was submitted on time. The IT infrastructure and data management process successfully supported this milestone.</p> <p>Local temporary servers (one for database, one for Cad data) were utilized as planned and then removed from the network as agreed.</p> <p>Local server backups are being performed regularly and restore capability was confirmed during a change out of equipment on the server, when IT staff utilized these backup tapes to restore the data.</p> <p>The wireless connectivity to CAWWT has been relatively stable (occasionally, the router at CAWWT needs to be rebooted). We are working towards wired replacement solution by the end of the FY.</p> <p>There were two outages with our connectivity to GJO, the cause of which are not fully understood by IT. The outstanding issue has been slowness, especially of email, by some users. Enterprise IT organization is investigating solutions to this.</p>			

FERNALD PRESERVE INTERVIEW RECORD

Name of Individual Contacted: Bill Hertel		Time: 2:12 PM	Date: 7-20-07
Title: Aquifer Restoration Manager		Organization: Stoller	
Street Address: 10995 Hamilton-Cleves Hwy. City, State, Zip: Harrison, OH 45030		Telephone No: 513-648-3894 Fax No: E-Mail Address: bill.hertel@lm.doe.gov	
Type: <input type="checkbox"/> Telephone <input checked="" type="checkbox"/> Other <input type="checkbox"/> Visit - Location of Visit:			
Contact Made By (Name): Lisa McHenry			
Title: Restoration Ecologist		Organization: Stoller	
Summary Of Conversation			
<p>Generally, the Aquifer Remediation did progress as planned. We did shut down the well field in mid June to allow aquifer water levels to rebound so that uranium tied up in the unsaturated zone could hopefully be remobilized and removed from the aquifer by our extraction wells. This is the first year that we are doing this.</p>			

FERNALD PRESERVE INTERVIEW RECORD

Name of Individual Contacted: Carla Rack		Time: 9 a.m.	Date: 07-10-07
Title: Community Relations		Organization: Butler County sheriff	
Street Address: 705 Hanover St. City, State, Zip: Hamilton, OH 45011		Telephone No: 513-785-1031 Fax No: E-Mail Address:	
Type: <input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Other <input type="checkbox"/> Visit - Location of Visit:			
Contact Made By (Name): Sue Walpole			
Title: Community Relations		Organization: S.M. Stoller	
Summary Of Conversation			
<p>After a description of why I was calling, and what Fernald was all about, I asked her about any concerns or questions she had about the Fernald Preserve. She had no comment or concerns and thought we were doing a good job.</p>			

FERNALD PRESERVE INTERVIEW RECORD

Name of Individual Contacted: Fireperson at Station 1		Time: 9 a.m.	Date: 07-09-07
Title: Fireperson		Organization: Morgan Township Fire Department	
Street Address: Ross Station – 2565 Cincinnati-Brookville Rd.		Telephone No: 738-2023	
City, State, Zip: Ross, OH 45061		Fax No:	
		E-Mail Address:	
Type: <input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Other <input type="checkbox"/> Visit - Location of Visit:			
Contact Made By (Name): Sue Walpole			
Title: Community Relations		Organization: S.M. Stoller	
Summary Of Conversation			
<p>The officer had no comment and felt everything was as expected..</p>			

FERNALD PRESERVE INTERVIEW RECORD

Name of Individual Contacted: Ric Strobl		Time: 7 p.m.	Date: July 2, 2007
Title: Treasurer		Organization: Fernald Community Alliance	
Street Address:		Telephone No: 741-9056	
City, State, Zip:		Fax No:	
		E-Mail Address:	
Type: <input type="checkbox"/> Telephone <input type="checkbox"/> Other <input checked="" type="checkbox"/> Visit - Location of Visit: Crosby Township Community Center			
Contact Made By (Name): Sue Walpole			
Title: Community Relations		Organization: S.M. Stoller	
Summary Of Conversation			
<p>Ric thought everything was going well and was looking forward to the opening of the Visitors Center and exhibits.</p>			

FERNALD PRESERVE INTERVIEW RECORD

Name of Individual Contacted: Steve Rigling	Time: 7 p.m.	Date: June 7, 2007
---	--------------	--------------------

Title: Nearby neighbor	Organization:
------------------------	---------------

Street Address:	Telephone No: [REDACTED]
-----------------	--------------------------

City, State, Zip:	Fax No:
-------------------	---------

E-Mail Address:

Type: <input type="checkbox"/> Telephone <input type="checkbox"/> Other <input checked="" type="checkbox"/> Visit - Location of Visit: Fernald preserve

Contact Made By (Name): Sue Walpole

Title: Community Relations	Organization: S.M. Stoller
----------------------------	----------------------------

Summary Of Conversation

Steve was very appreciative of how the cleanup has gone and believes that his property and the animals are more abundant because of the restoration. He is however very concerned about the proposed drag strip and we talked about that at length.

**RESPONSES TO OHIO ENVIRONMENTAL
PROTECTION AGENCY COMMENTS ON THE
COMPLETED CHECKLIST FOR THE MARCH 2007
FERNALD SITE QUARTERLY INSPECTION**

**FERNALD PRESERVE
FERNALD, OHIO**

AUGUST 2007

U.S. DEPARTMENT OF ENERGY

use of GPS during site inspections is not feasible. Instead, a GPS unit can be used to document findings during follow-up walk downs and maintenance activities.

d) DOE agrees with the comment. During the June inspection, the use of flags was limited to one color (yellow), which indicates to the onsite Radiological Control Technician the presence of debris. All other findings were not flagged, but rather marked on aerial photos.

e) The use of a color-coded and/or symbol key will be investigated for future inspections.

Action: DOE will continue to refine the field walk down and documentation during site inspections. Additional revisions and enhancements will be explained to participants prior to the start of the September 2007 inspection. Significant revisions to the site inspection process will be documented as part of the October 2007 LMICP revision.

2. Commenting Organization: OEPA

Commenter: OFFO

Section: General

Pg #:

Line #:

Code: C

Original Comment#

Comment: a) The issue regarding the “poor grade” of mulch was discussed between Ohio EPA and Stoller during the walk down of Area 1 (Former Administration Area and Production Area). Ohio EPA understands that the litter was to be “removed” from Area a) Has this activity occurred and if not, where does this fit into priorities or corrective actions? How will such issues be tracked?

b) In addition, there appeared to be more than a significant amount (several layers) of this poor grade mulch in the area facing the “Four Administration Trees” which extends to the road. One thought was to remove or reduce the layers of mulch in that area to an appropriate amount /layer. Will this be addressed as discussed or will other measures be taken? This issue was not addressed in the report nor was it shown on the map.

c) Should future inspections include flagging the litter, possibly with a different flag color?

Response: Composted yard waste was used as a soil amendment across much of the Former Production Area and the Waste Pits Area. Inevitably, during the collection of yard waste, some litter is collected as well. Retail consumer-grade compost processing typically screens out the majority of litter. However, given the large quantities of compost required at the site, much of the compost received was either unscreened or screened with a one-inch screen. In either case, a small amount of litter is mixed in with the compost. Specific responses are provided below.

a) Litter that is mixed in with composted yard waste is cleared by hand as time permits. Since the issue is primarily related to aesthetics, areas within the paved road corridor are prioritized. As with all field activities, maintenance items are documented in field logs and on Daily Safety and Job Briefing sheets.

b) The area in front of the former Administration Building was cleared by hand in late May and early June.

c) Flagging litter would not add value to the inspection process. A general notation on an aerial photo indicating the presence of litter within an area would be sufficient. For future site inspection reporting, items such as the presence of litter and noxious weeds may not be individually noted. Experience from the March 2007 site inspection showed that labeling specific locations of thistle infestation was not very helpful. Herbicide application addressed larger-scale areas than what was typically indicated on site inspection maps. The presence of litter is also handled on an "area by area" basis. Therefore, instead of flagging or labeling specific locations of such items on inspection photos, a more general area-wide designation would be more beneficial.

Action: See Action to Response No. 1 above.

3. Commenting Organization: OEPA	Commenter: OFFO
Section: General	Line #: Code: C
Pg #:	
Original Comment#	

Comment: DOE and Stoller need to work with the Agencies to devise a plan for follow-up reporting on the Site Inspections. The Site Inspection Report contains useful information on site conditions on the day(s) of the inspection, but does not contain a description of corrective actions to be taken and timeframe.

Response: The June 2007 Inspection Report will provide a means of documenting corrective actions resulting from site inspection findings. Addressed items will be indicated on a site map and discussed in the text.

Action: Document corrective actions as part of the June 2007 Site Inspection report. Significant revisions to the site inspection reporting process will be documented as part of the October 2007 LMICP revision.

4. Commenting Organization: OEPA	Commenter: OFFO
Section: General	Line #: Code: C
Pg #:	
Original Comment#	

Comment: a) Getting vegetation to grow seems to be a pervasive problem on remediated areas. DOE and Stoller should develop a standardized system to rate percentage of vegetative cover in a given area. Instead of, "The Waste Pit area looked pretty good..." consider using a scale of 1 to 10 or even a percentage of vegetative cover and/or percent seeded cover.

b) The issue of reseeding an area if warranted was not mentioned in the report. Reseeding came up in conversation during the site inspection and if it is still outstanding and DOE's plan is to reseed some areas at Fernald, this needs to be covered in the report.

Response: Vegetation establishment is an important component of legacy management goals and objectives. While the site inspection process does not specifically address vegetation cover, DOE agrees that it should be evaluated during site inspections. Specific responses are provided below.

second day of the inspection, a couple hours were spent checking the existing buildings at Fernald for vandalism, animal borrowing or disturbance, outside electrical issues, etc. The outcome of this was not provided in the report and needs to be incorporated.

Response: See Response to Comment No. 8.

Action: See Action for Comment No. 8.

15. Commenting Organization: OEPA

Commenter: OFFO

Section: 1/Disturb & Use of Fernald

Pg #: 1

Line #: 11

Code: C

Original Comment#

Comment: Repairing erosion issues are a large part of the corrective actions that need to take place at Fernald. Only by repairing these areas and getting vegetation established then progress can take place. Even though it is an "item" that's evaluated during the inspection and is currently listed on the checklist, erosion should be addressed in more detail in the report. Some type of mechanism is warranted to track, evaluate, and document repair progress of an eroding area over time.

Response: Erosion repair is an important component of site corrective actions and will be tracked over time. However, repair efforts will be handled on a project-specific basis and detailed evaluation will be conducted separately from the site inspection process. The site inspection walk downs will be used to verify project-specific findings.

Action: None required.

