



State of Ohio Environmental Protection Agency

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January 2, 2001

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: CONDITIONAL APPROVAL - DRAFT IMPLEMENTATION PLAN FOR A1P3 DEBRIS REMOVAL

Dear Mr. Reising:

Ohio EPA has reviewed DOE's December 15, 2000 submittal, "Transmittal of the Draft Implementation Plan for Paddy's Run Debris Removal/Bank Stabilization and A1P3, and Report of Electromagnetic Terrain Conductivity Surveys within A1P3 Investigations at the FEMP." Ohio EPA believes the plan is adequate to initiate work during favorable weather conditions. We expect our comments to be incorporated into the work and responded to at the soonest possible date.

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

Sincerely,

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

- cc: Jim Saric, U.S. EPA
- Terry Hagen, FDF
- Ruth Vandergrift, ODH
- Mark Shupe, HSI GeoTrans
- Francie Hodge, Tetra Tech EM Inc.

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**IMPLEMENTATION PLAN FOR PADDYS RUN DEBRIS REMOVAL/BANK STABILIZATION
AND AREA 1, PHASE III**

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Pg #: 1-4 Line #: 14-16 Code: C
Original Comment #:
Comment: Certification of A1PIII Part One soils is not complete. Sampling in the area of debris excavation is forthcoming, and needs to be included in the certification document. As stated in the SEP, Section 3.4.7: "Upon *completion* of all certification activities within a remediation area, a formal certification report will be issued for the *entire* remediation area". A certification report submitted for review without complete certification results for the entire area is unacceptable and will not be reviewed.

- 2) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.3.2.1 Pg #: 1-5 Line #: NA Code: C
Original Comment #:
Comment: Although no cave salamanders were found during the survey for them, the terrain in the northeast fill area appears to be excellent habitat for the salamanders. Construction workers should be made aware of this and, if possible, a representative of the natural resources group should be present when this area is excavated. You may recall that during the draining and filling of the old cistern in area 1 phase I, a representative from natural resources was present to watch for cave salamanders. Any that were found could be relocated to suitable habitat.

- 3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.3.3 Pg #: 1-7 Line #: NA Code: C
Original Comment #:
Comment: Upon completion of the cultural resource survey, a map should be provided to the agencies depicting areas to be protected. This should be provided prior to start of the project.

- 4) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.4 Pg #: 1-8 Line #: 1-17 Code: C
Original Comment #:
Comment: Conspicuously absent from the list is assuring that down gradient storm water controls are in place prior to up gradient disturbance. Perhaps I am biased, but I hope this is considered by the soils and OU5 groups to be an important lesson learned.

- 5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Figure 1-3 Pg #: Line #: NA Code: C
Original Comment #:
Comment: Seeding should be completed compliant with the most recent version of the permanent seed mix and include both wet and dry mixes as determined by a representative from the FF Natural Resources group.

- 6) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Figure 1-3 Pg #: Line #: NA Code: C
 Original Comment #:
 Comment: The figure lacks in detail regarding the method and availability of stream access within A8P2 without negatively impacting the restoration project completed in this area. Prior to start of work a detailed access map should be created and appropriately flagged to ensure no damage to existing restored areas. Additionally, any access that must be graded into Paddys Run should be appropriately stabilized and restored with seeding, matting and dormant stakes.
- 7) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Figure 1-3 Pg #: Line #: NA Code: C
 Original Comment #:
 Comment: All efforts must be made to limit the impacts of heavy equipment on the State Threatened Sloan's crayfish. In-stream work must be planned to minimize the amount of movement by the equipment. To the extent possible debris should be collected from above the bank. Where not possible planning should be made such that the maximum debris removal can occur with a minimum of in-stream equipment movement. Ohio EPA requests sufficient prior notice for in-stream work such that we may have a representative present.
- Due to the potential impacts to the Sloan's crayfish population, the population monitoring under the IEMP should be completed during 2001 rather than waiting until 2002.
- 8) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Figure 1-3 Pg #: Line #: NA Code: C
 Original Comment #:
 Comment: The bank stabilization discussed in the document is insufficient. A plan, including contingencies, for stabilizing the bank should be developed as an addendum to this document. The bank will likely require slope grading and stabilization along with toe stabilization and revegetation following completion of the project and prior to spring flooding. Obviously, stabilization of this bank is important to protecting the Sloan's crayfish habitat as well as maintaining stream flow to protect the railroad tressel.
- 9) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Figure 1-3 Pg #: Line #: NA Code: C
 Original Comment #:
 Comment: Any alterations to vehicle traffic flow from the original plan must be concurred with by a representative from the FF Natural Resources Group to ensure protection of jurisdictional wetlands in the area.
- 10) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Figure 1-3 Pg #: Line #: NA Code: C
 Original Comment #:

Comment: All tree removal and alterations to vehicle flow patterns must be concurred with by a representative from the FF Natural Resources Group to ensure protection of important natural resources.

- 11) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.3.1 Pg #: 3-2 Line #: 34-35 Code: C
Original Comment #:
Comment: Excavation in the areas of debris must continue until native soil has been reached, as determined by a field geologist.
- 12) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.5 Pg #: 3-4, 3-5 Line #: 33-34, 1-2 Code: C
Original Comment #:
Comment: See comment # 1.
- 13) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.1 Pg #: 4-1 Line #: NA Code: C
Original Comment #:
Comment: See comment regarding cave salamanders above.