



Department of Energy  
Ohio Field Office  
Fernald Closure Project  
175 Tri-County Parkway  
Springdale, Ohio 45246  
(513) 648-3155



OCT 19 2004

DOE-0017-05

Mr. James A. Saric, Remedial Project Manager  
United States Environmental Protection Agency  
Region V, SR-6J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Mr. Bill Kurey  
United States Fish & Wildlife Service, Suite H  
6950 American Parkway  
Reynoldsburg, Ohio 43068

Dear Mr. Saric, Mr. Schneider, and Mr. Kurey:

**TRANSMITTAL OF THE RESPONSES TO THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS AND THE REVISED PADDYS RUN EAST NATURAL RESOURCE RESTORATION DESIGN PLAN**

- References:
- 1) Letter DOE-0289-04 from W. Taylor to J. Saric/T. Schneider, "Transmittal of the Draft Paddys Run East Natural Resource Restoration Design Plan," dated July 12, 2004
  - 2) Letter from J. Saric to J. Reising, "Paddys Run East Restoration Design Plan," dated August 12, 2004
  - 3) Letter from T. Schneider to W. Taylor, "Disapproval - Draft Paddys Run East NRRDP," dated August 30, 2004

Enclosed for review and approval are the responses to the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA) comments and the revised Paddys Run East Natural Resource Restoration Design Plan (NRRDP) (References 2 and 3).

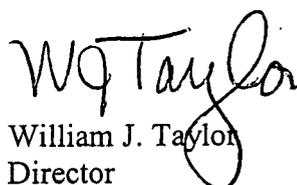
Mr. James A. Saric  
Mr. Tom Schneider  
Mr. Bill Kurey

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DOE-0017-05

If you have any questions, please contact Johnny Reising at (513) 648-3139.

Sincerely,

  
William J. Taylor  
Director

FCP:Reising

Enclosure: As Stated

cc w/enclosure:

D. Pfister, OH/FCP  
J. Reising, OH/FCP  
P. Yerace, DOE/OH  
T. Schneider, OEPA-Dayton (three copies of enclosure)  
G. Jablonowski, USEPA-V, SR-6J  
D. Bidwell, FCAB  
D. Sarno, FCAB  
F. Bell, ATSDR  
M. Cullerton, Tetra Tech  
M. Shupe, HSI GeoTrans  
R. Vandegrift, ODH  
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

G. Stegner, DOE/OH  
K. Alkema, Fluor Fernald, Inc./MS01  
J. Chiou, Fluor Fernald, Inc./MS64  
J. Homer, Fluor Fernald, Inc./MS90  
W. Hooper, Fluor Fernald, Inc./MS64  
U. Kumthekar, Fluor Fernald, Inc./MS64  
L. Ludwick, Fluor Fernald, Inc./MS90  
D. Nixon, Fluor Fernald, Inc./MS01  
F. Johnston, Fluor Fernald, Inc./MS52-5  
D. Powell, Fluor Fernald, Inc./MS64  
H. Swiger, Fluor Fernald, Inc./MS90  
S. Walpole, Fluor Fernald, Inc./MS76  
E. Woods, Fluor Fernald, Inc./MS90  
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO  
U.S. AND OHIO ENVIRONMENTAL PROTECTION AGENCY  
TECHNICAL REVIEW COMMENTS ON PADDYS RUN EAST  
NATURAL RESOURCE  
RESTORATION DESIGN PLAN**

**FERNALD CLOSURE PROJECT  
FERNALD, OHIO**

**OCTOBER 2004**

**U.S. DEPARTMENT OF ENERGY**









19. Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.2 Pg #: 3-1 Line #: NA Code: C  
 General Comment #: 5  
 Comment: The intent behind thinning of the pines is unclear and not consistent with previous actions in the Northern Pine Plantation. Please provide additional justification for this approach including ecological benefits and cost benefits vs. clearing. The methods for removal and girdling should be further clarified, since these would seem to be actions that may be difficult at the site.  
 Response: Additional detail regarding thinning methodology is provided in Section 4.1.2.2. Thinned portions of the South Pines will keep an intact canopy that will benefit shade tolerant, understory woody and herbaceous plants.  
 Action: Revise text in Section 3.2, Paragraph one describing the ecological benefits of thinning.
20. Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.2 Pg #: 3-2 Line #: NA Code: C  
 General Comment #: 6  
 Comment: It is unclear under what circumstances DOE is proposing to use the Interim Seed mix as part this restoration project. The interim mix should only be used in those locations expected to be disturbed by heavy equipment again in the near future and is generally not appropriate for restoration do to the heavy loading of non-native seed.  
 Response: The Interim Seed mix will be used in cleared areas where forest establishment is the goal.  
 Action: Revise text accordingly.
21. Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.2 Pg #: 3-2 Line #: NA Code: C  
 General Comment #: 7  
 Comment: The area described as wetland/open water on Figure 3-2 should be added to the A2P2 and include plantings of buttonbush, winterberry and swamp rose within the open water areas. Additionally, wood duck should be installed in this pool area.  
 Response: Agreed.  
 Action: Revise text accordingly.
22. Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.2 Pg #: 3-2 Line #: NA Code: C  
 General Comment #: 8  
 Comment: Within the area designated as 7 on Figure 3-2, the existing soil stockpile should be regraded to decrease side slope angles so that it is safer and more consistent with existing topography. It is probable that the pile in its current configuration would create stewardship issues down the road as future users question its status.  
 Response: Agreed.  
 Action: Revise text accordingly.
23. Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 3.3 Pg #: 3-2 Line #: NA Code: C  
 General Comment #: 9  
 Comment: It seems premature to plan and/or implement restoration in the areas adjacent to the SSOD considering substantial excavations may/will be necessary to remove contamination/debris in the area. Additional detail is needed on how these remediation activities will not impact the proposed restoration. The remediation will very likely increase the scope of needed restoration activities in the area.  
 Response: See Response to Comment No. 15  
 Action: See Action for Comment No. 15





Commenting Organization: Ohio EPA  
Section #: 4.3.2 Pg #: 4-5  
General Comment #: 20

Commentor: OFFO  
Line #: NA

Code: C

Comment: Use of the interim seed mix in restoration is inappropriate this seed mix was not designed for restoration areas and includes an overwhelming rate of non-natives. Either music or woodland seed mix should be used in all open planting patches.

Response: See Response to Comment No. 20.

Action: None Required.

Commenting Organization: Ohio EPA  
Section #: 5.0 Pg #: 5-1

Commentor: OFFO  
Line #: NA

Code: C

General Comment #: 21

Comment: Obviously the monitoring is insufficient and unacceptable. Monitoring should be revised to include 2 years of implementation monitoring and 2 rounds of functional monitoring after project completion as previously agreed to by the trustees. ASite closure@ should not impact monitoring requirements or Asite closure@ should be delayed until such time as all monitoring requirements are met.

Response: Monitoring activities beyond site closure are outside the scope of the closure contract. Plans for post-closure monitoring will need to be developed in cooperation with the Office of Legacy Management.

Action: None required.