

**RESPONSES TO U.S. EPA COMMENTS  
ON THE AREA 1, PHASE I CERTIFICATION REPORT**

**SPECIFIC COMMENTS**

Commenting Organization: U.S. EPA  
Section #: 1.2  
Original Specific Comment #: 1

Page #: 1-2

Commentor: Saric  
Line #: 5

Comment: The text refers the reader to Appendix D for a summary of project-specific plans (PSP). However, the report contains only Appendixes A and B, and the PSPs are not discussed elsewhere in the report. Appendix D should be provided for review and listed in the table of contents.

Response: The PSP summaries were included as Appendix D in the June 1997 submittal of the report. However, the PSPs were deleted from the May 1998 submittal since the information provided was redundant. No comments were received on the Appendix D from the June 1997 submittal, and in order to streamline the document, the PSP summaries will not be included in the final submittal.

Action: The reference to the PSP summary appendix has been deleted. A change page is included.

Commenting Organization: U.S. EPA  
Section #: 1.5  
Original Specific Comment #: 2

Page #: 1-4

Commentor: Saric  
Line #: 27 to 31

Comment: The text identifies the titles of all attachments as "Certification Data Tables." The text should be revised to cite the actual titles of the attachments.

Response: Agreed.

Action: The text has been changed to correctly cite the attachments. A change page is included.

Commenting Organization: U.S. EPA  
Section #: 2.4.1  
Original Specific Comment #: 3

Page #: 2-9

Commentor: Saric  
Line #: NA

Comment: The text refers the reader to Table 2-5 for the standard deviation of data from nonimpacted areas. The text should be revised to cite Table 2-6 instead.

Response: Agreed.

Action: The text has been changed to correctly cite Table 2-6. A change page is included.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 2.5.1

Page #: 2-11

Line #: 3

Original Specific Comment #: 4

Comment: The text describes generation and use of sets of three random numbers. The third number of each set is called "a random number," but the following text implies that the third number is used as an index for sorting the other random numbers. The text should be revised to clarify this matter.

Response: Agreed.

Action: The text has been revised, and a change page is included.

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 4.3

Page #: 4-6

Line #: 11

Original Specific Comment #: 5

Comment: The text states that full data on the ecological. However, Appendix C is not included in the report, and these data are not provided in Appendix B. Appendix C should be provided for review and listed in the table of contents.

Response: The ecological area-specific contaminants of concern (ASCOC) provided in Appendix C of the June 1997 was deleted from the May 1998 submittal since the information provided was redundant. For each CU the ecological data is included in the Appendix A data summary tables. No comments were received on the Appendix C from the June 1997 submittal, and in order to streamline the document the tabular summary of the ecological data will not be included in the final submittal.

Action: The text has been revised to remove the reference to the tabular summary of the ecological COC data. A change page is included.

Commenting Organization: U.S. EPA

Commentor: Saric

Appendix #: A

Page #: NA

Line #: NA

Original Specific Comment #: 6

Comment: This appendix should be revised to include a brief introduction explaining the organization of sections, especially those designated by the various colored tabs. In addition, all data designated by the yellow tabs are also provided with the corresponding blue tabs, so the yellow tabs and their data could be deleted. Also, in many tables (particularly those designated by the red tabs), the shading of the table headings is too dark, rendering the text illegible. In future reports, this shading should be deleted.

Response: A brief introduction to each section will be included for Appendix A.

Action: An additional introduction page is included.

Commenting Organization: U.S. EPA

Commentor: Saric

Appendix #: A

Page #: NAR-3, Red Tab

Line #: NA

Original Specific Comment #: 7

Comment: In this table and in Appendix B, the radiological results for sample NAR-3-3C-R and its field duplicate have "R" flags assigned during data validation and are not used in calculations. Similar "R" flags were assigned to the arsenic and beryllium results for three samples collected from certification unit Q20. However, Tables 4-1 through 4-3 contain no discussion of "R" flags for the arsenic, beryllium, and radiological results. Section 4.0 and its tables should be revised to reflect all the data with "R" flags contained in the appendices.

Response: Agreed.

Action: The tables have been revised, and a change page is included.

Commenting Organization: U.S. EPA

Commentor: Saric

Appendix #: B

Page #: B-1

Line #: NA

Original Specific Comment #: 8

Comment: The text refers the reader to Appendix C for full data on the ecological ASCOC, aluminum, manganese, and molybdenum. As noted in Original Specific Comment 5, Appendix C is missing from the report and should be provided for review. In addition, many of the tables in the blue tab section of Appendix A (such as those for certification units NAR-1, O19, P17-31, PUMP-1, and Q18) include lead as an ecological ASCOC. The text should be revised to include lead as an ecological ASCOC.

Response: As discussed in the response to Specific Comment 5, the ecological ASCOC table provided in Appendix C of the June 1997 was deleted from the May 1998 submittal since the information provided was redundant. In order to streamline the document, the tabular summary of the ecological data will not be included in the final submittal. In Table 2-2, lead is correctly identified as an ecological COC.

Action: The reference to Appendix C has been deleted, and change pages are included.

Commenting Organization: U.S. EPA

Commentor: Saric

Appendix #: B-1

Page #: B-1-1

Line #: NA

Original Specific Comment #: 9

Comment: This appendix should be revised to include brief introduction explaining why the data presented in Appendix B-1 were not used in the certification process. This introduction should refer the reader to Section 4.1.2 for detailed information.

Response: Agreed.

Action: An introduction page is included.

Commenting Organization: U.S. EPA

Commentor: Saric

Attachment #: A

Page #: NA

Line #: NA

Original Specific Comment #: 10

Comment: This figure showing the current certification status of the Fernald Environmental Management Project is useful for putting the report in context. With appropriate updating and revision, the figure should be included in future reports to communicate the progress of the environmental remediation project to all concerned.

Response: Agreed. The current revision of the SEP includes this requirement.

Action: None.