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**ADDITIONAL INPUT TO THE RESPONSE TO
UNITED STATES EPA AND OEPA COMMENTS ON
THE SITE WIDE CHARACTERIZATION REPORT**

01/04/93

**DOE-FN/EPA
DOE-0766-93**

LETTER



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

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JAN - 4 1993
DOE-0766-93

Mr. James A. Saric, Remedial Project Director
U.S. Environment Protection Agency
Region V - 5HRE-8J
77 West Jackson Street
Chicago, Illinois 60604

Mr. Graham E. Mitchell, Project Manager
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402

Dear Mr. Saric and Mr. Mitchell:

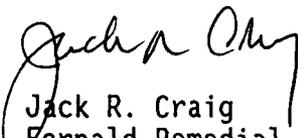
**ADDITIONAL INPUT TO THE RESPONSE TO UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY AND OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE SITE WIDE
CHARACTERIZATION REPORT**

Reference: Letter DOE-0484-93, Response to USEPA and OEPA Comments on the
Site Wide Characterization Report (SWCR), J. Craig to J. Saric,
dated November 30, 1992

The purpose of this letter is to transmit a missing page from the comment responses on the Site Wide Characterization Report document. This page was identified as missing in December of 1992. In light of the need for additional time required for review by the agencies, the missing page is being forwarded under separate cover and is to be incorporated into the existing document. The missing page is numbered 135. We hope this inadvertent omission will not adversely affect the review of the comment responses.

If you or your staff have any questions, please contact Randy C. Janke at FTS/Commercial 513-738-6937.

Sincerely,


Jack R. Craig
Fernald Remedial Action
Project Manager

FN:RC Janke

Enclosure: As Stated

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cc w/enc.:

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W. E. Murphie, EM-42, TREV
K. A. Hayes, EM-424, TREV
L. Jensen, USEPA-V, AT-18J
B. Barwick, USEPA-V, 5CS-TUB-3
J. Kwasniewski, OEPA-Columbus
P. Harris, OEPA-Dayton
M. Proffitt, OEPA-Dayton
T. Schneider, OEPA-Dayton
T. W. Hahne, PRC
L. August, GeoTrans
R. L. Glenn, Parsons
D. J. Carr, FERMCO/52-8
P. Clay, FERMCO/72
D. Dubois, FERMCO/72
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J. W. Thiesing, FERMCO
J. D. Wood, ASI/IT
J. E. Razor, ASI/IT
AR Coordinator, FERMCO

**SITE-WIDE CHARACTERIZATION REPORT
TECHNICAL COMMENTS**

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Comment: The NHPA, American Indian Religious Freedom Act (AIRFA), Archaeological Resources Protection Act (ARPA), and Native American Graves Protection and Repatriation Act (NAGPRA) require consultation with Native Americans, in the case of FEMP-the Shawnee and Iroquois, regarding interest in historical areas, cultural sites and natural resources areas. Documentation should be provided regarding this consultation process and its results.

Response: The purpose of the SWCR is to provide a summary of available data to describe the on-property and regional environment. The cultural resources section is intended to describe identified resources in the vicinity of the FEMP and to discuss the possibility of the existence of undiscovered resources in the area that could potentially be disturbed during remedial activities. To satisfy this goal, we include a discussion of the communication among the site, the OHPO, and the Advisory Council. It is not the purpose of the document to provide a comprehensive survey of FEMP compliance with other laws of this nature, including AIRFA, ARPA, and NAGPRA. Some discussion of these compliance issues is included in the Operable Unit 2 FS-EIS.

Action: None required.

369 **Commenting Organization:** U.S. EPA, Region V **Commentor:**
Section #: Cultural Resource **Pg. #:** **Line #:** **Code:**
Original Comment # 6

Comment: Previous and future field studies at the FEMP could potentially result in the accumulation of artifacts. Under 36 CFR Part 79, Curation of Federally-Owned and Administered Archaeological Collections, proper storage conditions must be maintained. Documentation should be provided regarding artifact/record storage.

Response: The purpose of the SWCR is to provide a summary of available data to describe the on-property and regional environment. It is not the purpose of the document to provide a comprehensive survey of FEMP compliance with other laws of this nature, including NAGPRA and 36 CFR Part 79. In the event of an unexpected discovery of artifacts during remediation, arrangements will be made through the OHPO for curation.

Action: None required.

370 **Commenting Organization:** U.S. EPA, Region V **Commentor:**
Section #: Cultural Resource **Pg. #:** **Line #:** **Code:**
Original Comment # 7

Comment: NAGPRA requires that artifacts and records be examined for possible repatriation to Native Americans. Documentation should be provided regarding an inventory of the FEMP collection and action taken under NAGPRA.

Response: The purpose of the SWCR is to provide a summary of available data to describe the on-property and regional environment. It is not the purpose of the document to provide a comprehensive survey of FEMP compliance with other laws of this nature, including NAGPRA. Again, in the event of an unexpected discovery of artifacts during remediation, arrangements will be made through the OHPO for curation.

Action: None required.

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