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CULTURAL RESOURCES

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LETTER



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

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MAY 07 1992

DOE-1471-92

Julie Quinlan
Technical and Review Services
Ohio Historic Preservation Office
1982 Velma Avenue
Columbus, Ohio 43211-2497

CULTURAL RESOURCES

Dear Ms. Quinlan:

As we continue to remediate the Fernald Environmental Management Project (FEMP) site and adjacent tracts that were subject to contamination, it will be necessary to drill monitoring wells, and to insert probes to locate gas and other contaminants. Since we felt such activity might have an impact on cultural resources, Behram Shroff, of my staff, met with you on February 6, 1992, to discuss the matter.

An informal agreement was made to submit to your office a set of procedures for the drilling activity, including safeguards and steps to be taken in case cultural resources were located. The enclosed procedure accomplishes this and we request your review and approval. We shall be happy to modify the document to reflect your concerns.

Once the document is finalized, we request a letter from the State Historic Preservation Officer stating his agreement with the procedure. Once that is accomplished, we shall be able to speedily accomplish the remedial work without burdening your office with formal consultation on individual projects.

By way of verifying that this approach is adequate, Behram Shroff discussed it with Tom Mc Cullough of the Advisory Council in Charleston, South Carolina on February 27, 1992, and he endorsed it. He stated that the Advisory Council did not need to be involved.

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If you or your staff have any questions, please contact Behram Shroff at 513-738-6003.

Sincerely,


R. E. Tiller
Manager

FN:Shroff

Enclosure: As Stated

cc w/encl.:

D. Ball, COE
C. Brown, WEMCO
C. Brown, ASI

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DEPARTMENT OF ENERGY

DRILLING PROCEDURES
AND UNEXPECTED DISCOVERY OF CULTURAL RESOURCES

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DEPARTMENT OF ENERGY
DRILLING PROCEDURES
AND UNEXPECTED DISCOVERY OF CULTURAL RESOURCES

1.0 PURPOSE

Section 106 of the National Historic Preservation Act (16 USC 470f) requires Federal agencies to take into account the effects of their actions on properties on, or eligible for, listing on the National Register of Historic Places, or other undiscovered resources. Federal regulation 36 CFR 800.11 of this act is concerned with properties discovered during implementation of a federal or federally funded project.

To comply with Section 106 and due to the large number of historic and archaeological resources existing in the area, assistance was requested by DOE from the Ohio State Historic Preservation Officer (SHPO) concerning proposed remedial activity at the Fernald Environmental Management Project (FEMP). As indicated in a letter from the SHPO, of July 26, 1990, any major activity to be completed beyond the boundaries of the FEMP must be preceded by an archaeological survey to determine the existence of potentially significant historic or archaeological resources.

Subsequent communication with the SHPO has resulted in an agreement that the survey work proposed by the US Army Corps of Engineers for the South Plume Removal Action satisfies this requirement. This is the only action expected to result in significant off-property earth disturbance.

2.0 SCOPE

This methodology addresses drilling procedures to minimize disturbance or destruction of cultural resources during ground-disturbing activities, and to effectively handle unexpected discoveries of these properties.

3.0 DEFINITIONS

Unexpected Discovery: Previously unknown historic or archaeological properties discovered after a project has begun, usually as a result of ground-disturbing activity, such as excavation.

Historic Properties: Any historic or prehistoric site, structure, or object included in, or eligible for, inclusion in the National Register of Historic Places. **Not included** in this category are artifacts lying on the surface of previously disturbed earth, such as arrowheads.

Archaeological Resources: Material remains of past human life having retrievable scientific information and over 50 years old. Also included are human remains or the remains of prehistoric biota associated with human occupation.

4.0 PREREQUISITES

- 4.1 This procedure assumes that the ground-disturbing activity is part of an approved field program and that standard field procedures are followed.
- 4.2 It is also assumed that under standard field procedures, all vehicles and drilling rigs will use existing roads to reach the sites whenever possible and only small areas of land are disturbed, as follows:
 - Installation of Groundwater Monitoring and/or Extraction Wells - This usually involves the installation of a permanent well casing and a concrete pad three feet square with a total area temporarily disturbed of approximately 30 feet by 30 feet. The borehole will be a maximum of approximately 14 inches and will not be at a depth beyond bedrock.
 - Hydropunch Sampling and Soil Vapor Surveys - These activities usually result in temporary disturbance of an area approximately 30 feet square; however, no permanent structure is installed.
- 4.3 The average size of the truck used for ground-disturbing activities will be 10 tons.
- 4.4 Except under emergency conditions, ground-disturbing activities will take place only in dry weather.

5.0 PROCEDURE

- 5.1 Upon the report of discovery of any artifacts, including human remains by the site operating contractor or a subcontractor, DOE shall notify the SHPO of the discovery and discuss the available options, including mitigation.
- 5.3 Per Section 106, contact the Advisory Council, if: (1) the SHPO refuses to make a determination in a reasonable amount of time, (2) the SHPO defers the decision to the Council, or (3) the DOE disagrees with the determination of the SHPO and desires a second opinion.
- 5.3 Per 36 CFR 800.11, decide whether or not to proceed with the activity which resulted in the discovery. If the decision is to proceed, DOE must determine the necessary mitigation to avoid further disturbance. An option which must be considered is relocation of the ground-disturbing activity.
- 5.4 Consult with the SHPO and/or the Advisory Council on mitigation.
- 5.5 Notify the contractor of the decision to continue or stop field work in the affected area, and any mitigation measures to be implemented if it is determined to proceed.
- 5.6 Implement mitigation.

6.0 RECORDS

Records resulting from this procedure shall be submitted for maintenance and shall include, at a minimum: copies of correspondence with the SOC and/or subcontractors, and copies of the Field Activity Daily Log from the affected area.

7.0 REFERENCES

Federal Register, September 29, 1983, "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation," Vol. 48, Number 190, Part IV, pp. 44716-44740, Washington, DC.

Federal Register, September 2, 1986, "Protection of Historic Properties," Vol. 51, Number 169, Washington, DC.

36 CFR 800, "Protection of Historic Properties," October 1, 1986.