2 Miarket Plaza Way, Mechanicsburg, Pennsylvania 17055

Telephone

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November 4, 2002

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Mr. Melvin N. Leach, Branch Chief Fuel Cycle Licensing Branch, FCSS c/o Document Control Desk U.S. Nuclear Regulatory Commission Washington, DC 20555

Mr. Mark Purcell U.S. Environmental Protection Agency Superfund Division (6SF-LP) 1445 Ross Avenue Dallas, TX 75202-2733

Subject: Southwest Alluvium Natural Attenuation Test, Final Report and TI  $\frac{1}{717.79}$ Evaluation, and Request for Action United Nuclear Church Rock Site, Gallup, **New** Mexico Facsimile

Dear Messrs. Leach and Purcell:  $717.795.8280$ 

Enclosed is the above-referenced document that was requested during the meeting held in Santa Fe, New Mexico, on March 7, 2002. As recommended, the report includes a technical impracticability (TI) evaluation to support a request for a TI waiver for sulfate and total dissolved solids (TDS).

Based on the results of the test, United Nuclear Corporation (United Nuclear) believes that sufficient data have been collected to demonstrate that natural attenuation mechanisms are more beneficial than the current corrective action at controlling the quality of groundwater for all key constituents of concern. Therefore, United Nuclear requests a decision from the agencies that the Southwest Alluvium system can be shut down permanently.

If the agencies agree that the system can be shut down, the following activities will be implemented for the Southwest Alluvium corrective action system:

- 1. Decommission the pumping wells.
- 2. Continue monitoring the system on an annual basis.



November 4, 2002 Mr. Melvin N. Leach, Branch Chief Mr. Mark Purcell Page 2 of 2

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- 3. Proceed to closure of the Southwest Alluvium remedial action system using a combination of:
	- Monitored Natural Attenuation (MNA) for chloride, chloroform, metals and radionuclides
	- TI Waiver for sulfate and TDS

Please contact Roy Blickwedel (General Electric Company) at (610) 992-7935 or me at (570) 925-5063 if you have any questions or need additional information.

Very truly yours, **Earth Tech, Inc.**

Suzie/du Pont Project Manager

Enclosure

cc: Roy Blickwedel, General Electric Corporation Larry Bush, United Nuclear Robin Brown, New Mexico Environment Department Diana Malone, Navajo Superfund George Padilla, Navajo Superfund Bill von Till, Nuclear Regulatory Conmission

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# **FINAL REPORT AND TECHNICAL IMPRACTICABILITY EVALUATION**

# **SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST CHURCH ROCK SITE**

November 2002

*Preparedfor:*

United Nuclear Corporation Gallup, New Mexico

*Prepared by:*

Earth Tech, Inc. 2 Market Plaza Way Mechanicsburg, PA 17055

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# LIST OF ABBREVIATIONS AND ACRONYMS



#### **1.0 INTRODUCTION**

On behalf of United Nuclear Corporation (United Nuclear), Earth Tech, Inc. (Earth Tech) is providing this report, which presents:

I. Natural Attenuation Test Results

The results of the completed natural attenuation (NA) test performed in the Southwest Alluvium at United Nuclear's Church Rock site near Gallup, New Mexico, are presented in Section 2.0. The NA test consisted of temporarily turning off the pumping wells in the Southwest Alluvium and monitoring water level and water quality monthly for a period of 18 months, from February 2001 through July 2002. The NA test was designed to demonstrate whether turning off the pump-back wells would have an adverse effect on water quality (i.e., whether there is a statistically significant difference in groundwater quality between the time before the temporary cessation of pumping and the time after the groundwater quality re-stabilized following the cessation period). United Nuclear followed the NA test procedures agreed to during the November 14, 2000, meeting in Santa Fe, New Mexico, as documented in the U.S. Environmental Protection Agency's (EPA's) e-mail letter from Greg Lyssy dated November 15, 2000 (Lyssy 2000).

2. Technical Impracticability Evaluation

A technical impracticability (TI) evaluation for two of the monitored constituents, sulfate and total dissolved solids (TDS) is presented in Section 3.0. These two constituents exceed the site standards inside and outside the property boundary and also in the background water that has not been impacted by tailings seepage. Active remediation has not been effective in reducing concentrations because the concentrations are controlled by natural geochemical conditions. Therefore United Nuclear has proposed that closure of the Southwest Alluvium remedial action include a TI waiver for sulfate and TDS. This approach was discussed with the agencies in the meeting on March 7, 2002 (Earth Tech, 2002b). To implement the TI waiver process, the EPA recommended that a TI evaluation be included in this final NA test report. The format of the evaluation is based on Section 4.0 of the EPA's *Guidance for Evaluating the Technical Impracticability of Ground-Water Restoration (1993).*

# **2.0 NATURAL ATTENUATION EVALUATION**

## **2.1 NA TEST DATA SET**

Water quality and water level data were collected from the four pumping and 10 monitoring wells listed in Table 2.1 and shown on Figure 2-1. Two data sets were used, including:

- Baseline data samples collected quarterly between July 1995 and January 2001. Water quality data from the three pumping wells (Wells 801, 802 and 803) that are monitored as part of the Performance Monitoring Program revealed that constituent concentrations were changing in the first few years of operation, but stabilized after about July 1995. The January 2001 data provided a common end point for the baseline data and also allowed collection of a baseline sample from Well 808, which was not included in the Performance Monitoring Program and had no water quality data prior to that time.
- Test data samples collected monthly after the pumping wells were turned off. This report presents the data collected for all 18 months of the NA test, from February 2001 through July 2002.

Well 808 was included in the NA test, but the evaluation of the water quality is not as comprehensive as for the other wells because only one baseline sample was collected. This well was not included in the Performance Monitoring Program, and therefore no water quality data were collected prior to January 2001. A review of the Well 808 data reveals that, other than the January 2001 data, the water quality at this well is similar to that at the other pumping wells. TDS, sulfate, chloroform and manganese are the only constituents exceeding the standards.

The January 2001 (baseline sample) from Well 808 is not considered representative of water quality in the well because of the sampling techniques used (high velocity pump causing turbulent flow and no filtration). The second quarter report (Earth Tech 2001) contains a detailed evaluation of the January data that supports this conclusion. Therefore the January data are not used in the trend analyses presented later in this report.

# 2.2 WATER LEVEL EVALUATION

Water levels were measured in all the wells on a monthly basis. Figure 2-2 presents the water level elevations for July 2002. As shown, water flows from northeast to southwest along the alignment of Pipeline Arroyo.

Figure 2-3A is a graph of water levels over time in the pumping and monitoring wells. This figure illustrates that the overall long-term trend of decreasing water levels as water drains from the Southwest Alluvium is continuing in wells not in the vicinity of the pumping wells. As shown, water levels in the vicinity of the pumping wells increased after the pumping wells were turned off in January 2001. Water levels in the former pumping wells are stabilizing at elevations similar to those measured in nearby monitoring wells. For example, in January 2001 the water levels in Wells 803 and 805 differed by 21 feet at 6,839.9 and 6,860.9 feet, respectively. By July 2001, the water levels in the two wells differed by only 1.3 feet. To illustrate this process, Figure 2-3B shows the water levels for only the pumping and adjacent monitoring wells. As of July 2002, water levels in both the pumping and monitoring wells have reached an asymptote and are beginning to return to the long-term pattern of groundwater decline. The stable to declining water levels in these wells indicate that the system has fully recovered from the effects of pumping.

The hydraulic effect of turning off the pumping wells is also evident in the nearest downgradient monitoring wells. As shown on Figure 2-3C, water levels began rising in Wells GW 1, GW 2, GW 3 and EPA 28 after the pumps were turned off. In contrast, the other monitoring wells, which are located either upgradient (Wells 509 D and EPA 23) or further downgradient (Wells EPA 25, 624, and 627), continued to exhibit the same trend in water levels that they had before the pumping wells were turned off. This change in water level trends at the nearest downgradient wells indicates that they were located within the hydraulic influence of the pumping wells. Now that the water levels in the pumped area have recovered, water levels throughout the system will continue to naturally decline until the artificial saturation in the alluvium drains out.

#### **2.3 WATER QUALITY EVALUATION**

Water quality data collected from January 2001 though July 2002 are presented in Table 2.2 Concentrations exceeding the site standards are shaded in the table. The water quality of the test data is similar to that of the baseline data (Appendix A), with sulfate and TDS being the primary constituents that exceed the site standards. Sulfate and TDS are the subject of a TI waiver request as discussed in Section 3.0. Figure 2-4 shows that sulfate concentrations are variable above and below the site standard both inside and outside the seepage-impacted area.

The approximate extent of seepage impacts (light blue shading) is delineated by:

- **Bicarbonate** which is released during the neutralization of acidic tailings solutions. Bicarbonate concentrations exceed 1,000 milligrams per liter (mg/L) in seepage-impacted water as naturally occurring calcite dissolves into the tailings solution.
- **Chloride**  which is associated with the milling process, is present in higher concentrations in the seepage compared to the background water, and is a chemically non-reactive ion in solution. Chloride concentrations greater than 150 mg/L indicate seepage impacts.

The justification for using these two indicator parameters to delineate seepage impacts was made previously (Earth Tech 2000a).

Other constituent concentrations exceeding the site standards include:

- a **Chloride -** Chloride concentrations continue to exceed the standard at Well 509 D. Previously chloride concentrations also exceeded the standards in Wells 632 and 801, but the recent concentrations are below the standards and concentrations in all three wells indicate a declining trend. Figure 2-5 illustrates the trend in chloride concentrations for these wells. Chloride has exceeded the standard at these wells throughout the baseline period and since the beginning of corrective action in the Southwest Alluvium. Chloride has not exceeded the standard at any other wells, other than three isolated exceedances in Well 802, since monitoring began in the Southwest Alluvium.
- $Metals In this final reporting period, as was the case throughout the test and prior to$ cessation of pumping, the only metal that exceeds its standard is manganese. Figure 2-6 shows that the exceedances occur only within the property boundary at Wells 801 and EPA 23. An improvement in water quality is evident from the fact that manganese is no longer present in concentrations exceeding the standard at Wells 509 D, 802, 803, or 808.
- **Chloroform** Figure 2-7 shows that chloroform exceeds the standard in four wells, as previously observed; however, as discussed in the *Geochemistry Report* (Earth Tech 2000a) and at the November 2000 meeting, these exceedances are two orders of magnitude below EPA's drinking water standards (EPA 1995) and only occur on-site. Like manganese and chloride, chloroform concentrations have exceeded the standards at these wells throughout the baseline period and since the beginning of corrective action in the Southwest Alluvium.

No radionuclides exceed the site standards. The occurrence of radionuclides is illustrated using uranium concentrations as an example (Figure 2-8). The concentrations are below the site standard both inside and outside the seepage-impacted area.

## **2.4 STATISTICAL EVALUATION**

The statistical evaluation used nonparametric trend analysis to verify whether changes in concentration, specifically increases in concentration, are occurring and whether the changes are significant. The statistical analysis consisted of an analysis of trend using linear regression supported by the statistical methods of Sen's Estimate of Slope and Mann-Kendall's (Kendall's) Test for Trend. The baseline and test data have a combination of normal, lognormal and unknown distributions, so application of Sen's Estimate and Kendall's test is appropriate.

Appendix A provides graphs of constituent concentrations over time for each well with regression lines plotted for the background and test data sets. Figures A.1 through A.14 graph the constituents that are reported in concentrations exceeding the standards (sulfate, TDS, manganese and chloroform) and the parameters that indicate seepage impacts (bicarbonate and chloride). Chloroform graphs are not included for wells where the chloroform concentrations were all nondetectable. Although none of the radionuclides exceeds the site standards in the Southwest Alluvium (Table 2.2), uranium is graphed as an example radionuclide.

The majority of the test data exhibits a trend that is similar to that evident in the baseline data. A few constituents exhibit an apparent change in trend compared to the baseline data, but most of these trends indicate an improvement in water quality (decrease in constituent concentrations). Where upward trends in the test data are evident, the concentrations of most of the constituents remain within in the range of concentrations that is observed in the baseline data.

To assess the reliability of the linear regression as an indication of water quality trends, two tests were applied to the data. First, Sen's estimate of the slope was applied to the data to determine whether the direction and magnitude of the regression line slope was a reasonable qualitative representation of the data. Sen's estimate was used because it is a nonparametric procedure that is not greatly affected by gross data errors or outliers (Gilbert 1987). Appendix B includes a description of how Sen's estimate is calculated and includes an example calculation. The results of the calculations are presented in Table B.5 along with the slope calculated for the linear regression. For the majority of the data, the slopes calculated by simple linear regression are

very similar both in direction and magnitude to the slope calculated using Sen's estimate. Therefore the linear regression lines provide an acceptable representation of water quality trends.

To further verify the significance of the trends indicated by the regression lines, Kendall's test for trend was used. Kendall's test is used because the data do not need to conform to any particular distribution (Gilbert 1987). The results of these statistical tests are summarized in Table B.6 of Appendix B. For each well, the results of Kendall's test are listed for both the baseline and test data. If a statistically significant trend is identified, the median slope of the trend calculated using Sen's estimate is also listed. Comparison of Table B.6 with Figures A.l through A.14 shows that the regression line trends are confirmed by the Kendall's and Sen's analyses where statistically significant trends are present.

A comparison of trends by constituent is presented in Table B.7. The data from the final quarter demonstrate three main features in the trends:

#### 1. Increase in Upward Trends for Bicarbonate, Chloride and TDS

During the NA test, seepage-impacted water was not partially captured as it had been before the groundwater recovery wells were turned off. The increasing number of upward trends in the test data for the seepage indicator constituents (bicarbonate and chloride) was therefore both an expected and observed result. The figures in Appendix A show that since the extraction wells were turned off the greatest increase in upward trend has occurred at the extraction and adjacent monitoring wells (Wells 801, 802, 803 and 632) that experienced the greatest change in hydraulic conditions (e.g., water levels rising 30 feet from the levels maintained when the wells were pumping). A large-magnitude upward trend is also evident at the nearest downgradient wells (GW 1, GW 2 and GW 3), which, as discussed in Section 2.2, were located within the hydraulic influence of the pumping wells. Bicarbonate and chloride concentrations in these wells have returned to their 1995 levels.

Table B.7 and the graphs in Appendix A show that the upward trend in chloride concentrations has been stable or declining over the recent quarter of the test. This reversal in the trend is evident primarily in the extraction and nearby monitoring wells and the three downgradient wells (GW 1, GW 2 and GW 3) and corresponds to the stabilization of water levels since the pumps were turned off. The reversal in the chloride trend may indicate that the seepage front that was moving in response to shutting off the pumps has begun to stabilize.

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TDS exhibits an increased upward trend in response to the increasing bicarbonate and chloride concentrations.

#### 2. No Change in Trend for Sulfate Eleven of 13 wells have had no statistically significant trend during the NA test. Sulfate is discussed further in the TI Evaluation (Section 3.0).

#### 3. No Change in the Trends for Manganese, Chloroform or Uranium

The patterns of trends for manganese, chloroform and uranium in the test data are similar to those in the baseline data and have remained unchanged throughout the test period. The lack of change in trends for these constituents confirms that natural attenuation mechanisms rather than pumping from the extraction wells are controlling the concentrations of the remaining constituents of concern. This is especially true since the trends for chloride and bicarbonate confirm that seepage-impacted water is migrating through the formerly pumped area. A corresponding change in the trends for the constituents of concern (i.e., increased number of upward trends) would be expected if pumping had been the mechanism controlling concentrations.

### 2.5 CONCLUSIONS

The results of the NA test confirm that natural attenuation is at least as effective as active remediation in attenuating most of the site constituents and reducing their concentrations to below the site standards within the property boundary. With the exception of the five constituents that exceed the site standards (chloride, sulfate, TDS, manganese and chloroform), the remaining constituent concentrations remained below the site standards throughout the test. Also, although the indicator parameters clearly showed that seepage continued to migrate, only sulfate and TDS concentrations exceeded the site standards off the property, and these two constituent concentrations are shown to be independent of seepage impacts as discussed in the TI evaluation (Section 3.0). The other three constituents exceeding site standards showed either a recent decreasing concentration trend (chloride) or no change in concentration trends (manganese and chloroform) during the test and continue to be present in concentrations exceeding the site standards only within the property boundary.

Based on the data collected through 11 years of active remediation and these NA test results, United Nuclear proposes that closure for the Southwest Alluvium remedial action proceed using monitored natural attenuation for chloride, manganese and chloroform.

# **3.0 TECHNICAL IMPRACTICABILITY EVALUATION**

#### **3.1 SPECIFIC ARARS OR MEDIA CLEANUP STANDARDS**

A TI waiver is requested for sulfate and TDS because, as demonstrated in the various reports and presentations provided over the years, the concentrations of these constituents are controlled by natural geochemical mechanisms. As a result, continued active remediation has not and will not have the effect of reducing concentrations to or maintaining them below the site standards. Currently the standards are exceeded in both the unimpacted background water as well as in the seepage-impacted water.

The current standards for sulfate and TDS are 2,125 mg/L and 4,800 mg/L, respectively. The original standards for these constituents (2,160 mg/L for sulfate and 3,170 mg/L for TDS) were developed in the Feasibility Study (FS) (EPA 1988a; page 3-16; Table 3-5) and used in the Record of Decision (ROD) (EPA 1988b; page 10, Table 2). However, at the request of United Nuclear, the Nuclear Regulatory Commission (NRC) reevaluated background water quality at the site and proposed new background concentrations in its 1996 report (NRC 1996; page 17, Table 3). The NRC recommended that different remediation standards be set for sulfate and TDS, but also recommended "that EPA consider dropping the standards for these constituents ... because of the difficulty of establishing appropriate standards given the physical and geochemical factors that control the concentrations" (NRC 1996; page 17). The revised background levels were agreed to as revised remediation standards as documented in the letter dated January 6, 1998, from the New Mexico Environment Department (NMED) to the EPA (NMED 1998).

TDS is included in the TI evaluation with sulfate because it also exceeds the standards outside the property boundary. TDS concentrations are made up primarily of sulfate, which contributes more than 50 percent of the TDS (Earth Tech 2000a; Section 3.2, page 3-3 and Figure 19). Figure 3-1 is a copy of Figure 19 and is included herein for reference. Because sulfate contributes more to TDS than all other ions combined, changes in TDS concentrations and concentration trends will depend primarily on the concentrations of sulfate in the water. This TI

evaluation is focused primarily on sulfate rather than on TDS because sulfate concentrations are the controlling factor in determining whether TDS concentrations exceed the standard.

# **3.2 SPATIAL EXTENT** OF **TI DECISION**

The extent of the area for which the TI determination is sought, shown as the TI zone on Figure 3-2, is as follows:

- **Vertical Extent** The vertical extent of the TI zone is the entire saturated thickness of the alluvium from the water table to the base of the alluvial formation. The extent of the saturated thickness is expected to reduce over time as the water originating from mine water discharge continues to drain out.
- \* **Horizontal Extent**  The horizontal extent of the TI zone is the area of seepage-impacted water extending from approximately 1,280 feet northeast of Well EPA 23 downgradient to the property boundary. In the cross-gradient direction, the TI zone covers the full extent of the saturated alluvium within this area. This area was selected for the TI zone in accordance with the guidance which states that "... [the 'TI zone'] generally will include all portions of the contaminated groundwater that do not meet the required cleanup levels" (EPA 1993, Section 4.4.2, page 12). Isolated sulfate concentrations within the TI zone exceed both the site standards and the concentrations reported in unimpacted background water. Outside the TI zone, sulfate and TDS are within the range of the concentrations reported for the unimpacted background water (see Sections 3.3.2 and 3.3.3). Also, the TI zone is comparable to the "containment area" described in the guidance as the area where further contaminant migration is controlled. In this case, migration is controlled by natural geochemical processes (see Sections 3.3.3 and 3.4.3).

# **3.3 CONCEPTUAL MODEL**

# **3.3.1 Hydrogeology**

The hydrogeological portion of the conceptual model for the Southwest Alluvium has been reported previously (Canonie Environmental Services Corp. [Canonie] 1987; Section 3.0, pages 13 to 25) and (Canonie 1988; Section 1.1, pages 1 to 2 and Figures 1-1 and 1-2) and is summarized herein. Figure 3-3 shows the development of the alluvial saturation. The picture at the top is the plan view layout of the site with the mine to the north (source of mine water discharge) and the Southwest Alluvium seepage-impacted area shown to the south in light blue. The red line (labeled A-A') extending from southwest to northeast on the plan view shows the location of the cross sections presented in the lower two details. Detail A illustrates the initial conditions prior to mine water discharge when the alluvium was unsaturated except for some minor base flow from natural recharge. Beginning in 1968, water from the mines to the north was discharged to Pipeline Arroyo where it flowed toward the southwest and percolated into and began to saturate the underlying alluvium. Detail B illustrates this process.

In October 1989, when the remedial action system wells were installed, the saturated thickness in this portion of the alluvium ranged from 78 feet at Well 509D to 52 feet at Well 802 to 50 feet at Well GW 2 at the southern property boundary, and 37 feet at Well 624. The hydraulic parameters for the alluvial system are summarized below:

<b>Parameter</b>	Value	Source of data
Hydraulic	Range:	Aquifer test data (Canonie 1987, Table 2.1,
Conductivity	$8.7 \times 10^{-4}$ to $2.0 \times 10^{-2}$ cm/s	Wells EPA 28, 625 and EPA 23), (Canonie
(K)	Geometric Mean:	1989b, Section 2.2.2, page 26 and Appendix
	$\frac{1}{3.69 \times 10^{-3} \text{ cm/s}}$	$D$ ).
<b>Effective Porosity</b> $(n_e)$	27% to 35%	Laboratory-measured total porosity of alluvial sediments = $39\%$ . Assume effective porosity
		is 10 to 30 percent lower than total porosity (Canonie 1989a, Section 4.1.3, page 41, $2nd$ para).
Gradient (i)	$0.009$ ft/ft	Based on water levels reported for Wells 805, 624 and 627 in October 1989 and July 2002.
Seepage velocity $(V=Ki/n_e)$	98 ft/yr to 127 ft/yr	Calculated using the geometric mean hydraulic conductivity and range of effective porosity listed herein.

**Summary of Hydraulic Parameters in the Southwest Alluvium**

The mine water reacted with the previously dry alluvial material and dissolved naturally occurring evaporite minerals. This process resulted in the postmining-pretailings water quality that exceeds New Mexico water quality standards for sulfate and TDS but, nevertheless, is the natural background water for the Southwest Alluvium (EPA 1988a; Chapter 2.0, pages 2 to 7, Background Levels of Contaminants, **2nd** paragraph, *1st* sentence; EPA 1988b; Section 3.2, page 8,2nd paragraph, *<sup>1</sup> 't* sentence).

#### **3.3.2 Formation and Extent of Seepage-Impacted Groundwater**

The understanding of seepage impacts and the geochemical portion of the conceptual model have also been reported previously (Canonie 1988, Section 2.2, pages 11 to 18, Tables 2.4 to 2.8) and (Earth Tech 2000a; Section 2.1, pages 2-1 and 2-2, Table 2, and Figures 2 and 7) and are summarized herein. Acidic tailings seepage percolated into the alluvium from the unlined tailings impoundments. Figure 3-4 illustrates the evolution of the seepage in the alluvium. Detail A shows the neutralization capacity with depth in the unsaturated part of the alluvium (Canonie 1988; Section 2.2, pages 11 to 18, Tables 2.4 to 2.8). The high acid neutralization potential (ANP) of the alluvial materials neutralized the acidic seepage at a distance of less than 10 feet beneath the tailings impoundment. As a result, the majority of the chemical constituents, particularly metals and radionuclides, were attenuated before the seepage reached the saturated zone.

The extent of seepage impacts over time is shown on Detail B of Figure 3-4 and is based on the concentrations of chloride and bicarbonate in the monitoring wells over time (as explained in Section 2.1). The pink shading shows that the seepage had migrated past the property boundary by 1982, five years after tailings discharge began and seven years prior to the start of active remediation. This extent was determined based on bicarbonate and chloride concentrations over time in Wells GW 1, GW 2 and GW 3. Graphs of these constituents in Wells GW 1 and GW 3 are shown on Figure 3-5. By 1989, when the active remediation began (orange shading), the seepage was well past the property boundary and by 1996 had migrated to Well 624. Figure 3-6 presents the chloride and bicarbonate concentrations in Wells 624 and EPA 25 and shows that seepage impacts had migrated to Well 624 but never fully extended laterally to Well EPA 25.

The current extent of seepage is shown in blue on Detail B of Figure 3-4. Based on the chloride and bicarbonate data from Well 624, the seepage is migrating at a rate of approximately 77 feet per year. At this rate, the seepage was projected to extend approximately 520 feet beyond Well 624 (see note 2 on Figure 2-4) as of July 2002. Although seepage impacts were already beyond the property boundary by 1982, the only constituents that have exceeded the site standards

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outside the property boundary are sulfate and TDS, as shown on Figure 3-4, Detail B, Figure 2-4 and listed in Table 2.2.

Well EPA 28 is not considered a seepage-impacted well as it was in the past. This change was made for two reasons. First, bicarbonate and chloride concentrations in this well have consistently been well below the seepage-impacted indicator concentrations of 1,000 mg/L bicarbonate and 150 mg/L chloride. Second, as discussed in Section 3.3.3 below, the other ion concentrations are also characteristic of unimpacted background water. Therefore Well EPA 28 is grouped with the other unimpacted Wells 627 and EPA 25.

#### **3.3.3 Sulfate Geochemistry**

Sulfate in the Southwest Alluvium groundwater comes from two sources:

- 1. Natural dissolution of sulfate-containing minerals in the alluvium, principally gypsum, due to discharge and infiltration of mine water and infiltration of rain and snow melt.
- 2. Sulfuric acid used in the milling process.

Sulfate concentrations are in equilibrium with gypsum everywhere in the Southwest Alluvium as well as the other two zones of groundwater corrective action (Southwest Alluvium - Earth Tech 2000a, Section 3.1, page 3-1 to 3-2, Figure 16, Appendix A) (Zone 1 - Earth Tech 2000b, Section 3.3, page 3-4 to 3-6, Figure 16, Appendix B) (Zone 3 - Earth Tech 2002c, Slide 37). The results of MINTEQA2 (Allison and others 1991) simulations are illustrated on Figure 3-7 by plotting the modeled gypsum saturation indices versus sulfate concentrations (July 2002 data) for groundwater at each well. The results of modeling using the median of data collected in 1998 and 1999, when the extraction wells were still pumping, is included for comparison. Details of the modeling, including input parameters, model runs and results, are provided in Appendix C.

The saturation indices all plot close to the solubility limit for gypsum whether the well is located inside or outside the extent of seepage-impacted groundwater. Equilibrium with gypsum throughout the alluvium has resulted from gypsum precipitation from tailings-derived water and dissolution of natural gypsum into groundwater as it is recharged. Without precipitation of gypsum, the saturation indices for seepage-impacted water would be well above gypsum equilibrium, and without dissolution of naturally occurring gypsum in the alluvial sediments, the saturation indices for background water would be well below gypsum equilibrium. Thus, sulfate concentrations are naturally regulated by the reaction:

$$
CaSO_4 \cdot 2H_2O \rightleftarrows Ca^{2+} + SO_4^{2+} + 2H_2O \qquad \qquad \text{(Reaction 1)}
$$

Where:

 $CaSO<sub>4</sub> \cdot 2H<sub>2</sub>O = gypsum$  $Ca^{2+} =$  calcium  $SO_4^2$  = sulfate  $H<sub>2</sub>O$  = water

Calcium, which is also required for gypsum precipitation, derives in part from calcite dissolution. The dissolution of calcite, which results in neutralization of acidic tailings seepage, occurs according to the reaction:

$$
CaCO3 + H+ \xrightarrow{\longrightarrow} Ca2+ + HCO3
$$
 (Reaction 2)

where:

$$
CaCO3 = calcite\nCa2+ = calcium\nHCO3 = bicarbonate\nH+ = proton (acidity)
$$

Figure 3-8 presents the results of the MINTEQA2 simulations (Appendix C), which demonstrate that calcite saturation indices for all the wells, both background and seepage-impacted, plot close to the solubility limit for calcite. This indicates that the Southwest Alluvium water is also in equilibrium with calcite.

Figure 3-9 illustrates the long-term stability of calcium and bicarbonate concentrations at Wells 627 and EPA 28, which are examples of background wells that have not been impacted by tailings seepage. Well 624 had about the same concentrations of calcium and bicarbonate until

1995 when the bicarbonate concentrations rose rapidly. Reaction 2 was driven to the right in response to the introduction of the tailings seepage, which had a lower pH (higher proton activity) than the native water. Calcium, however, did not increase because of the combination of Reactions 1 and 2. The combined reaction after making the appropriate algebraic operations is:

CaCO3 + H+ + S042 + 2H2 0 < > CaSO <sup>4</sup> 2H2 0 + HC03 - (Reaction 3) (Calcite + acidity + sulfate + water) (Gypsum + bicarbonate)

The presence of two calcium-bearing solid phases (gypsum and calcite - Figures 3-7 and 3-8, respectively) fixes the calcium in groundwater at a concentration in equilibrium with both minerals. Calcium concentrations in Wells 627, EPA 28, and 624 have been essentially the same through time; and in general, calcium concentrations do not vary appreciably anywhere in the groundwater flow system. For example, the median calcium concentration in the seepageimpacted water is 720 mg/L and in the unimpacted water is 595 mg/L for the data collected during the NA test (Table 2.2). In contrast, the median bicarbonate concentration has a much greater range, varying from 649 mg/L in the unimpacted water to 1,580 mg/L in the seepageimpacted water.

Reaction 3 sums up the evolution of seepage-impacted water chemistry in the Southwest Alluvium. In the tailings source where the low pH, high sulfate water originated, Reaction 3 proceeds spontaneously to the right because of the excess of protons. The result is dissolution of calcite, decreasing sulfate concentrations as gypsum precipitates and increasing bicarbonate concentration relative to the fixed aqueous component, calcium. This can be seen in plots of the ionic ratios between bicarbonate-to-calcium and sulfate-to-calcium for groundwater (Figures 3-10 and 3-11, respectively). Where acidity (protons) has been added, such as at Wells GW 1, GW 2, GW 3 and 624 (after 1995), bicarbonate-to-calcium ratios are relatively greater and sulfate-to-calcium ratios are relatively lower than for the background wells, such as Wells 627, EPA 28, and 624 (before 1995).

Decreases in sulfate concentrations due to gypsum precipitation were particularly dramatic in the early stages of seepage neutralization. Typical mill effluent had a sulfate concentration of about 57,000 mg/L (Science Applications, Inc. 1980; Table 2-3). As this water seeped through the tailings, sulfate concentrations decreased by over 70 percent to about 15,000 mg/L, as indicated by water sampled in Monitoring Well 634 and Lysimeter GC-6 located within the tailings (Canonie 1988; Tables 2.9 and 2.6). This sulfate concentration was further decreased as water moved through the underlying alluvium and became fully equilibrated with gypsum. As a result, the concentrations for sulfate and calcium are similar for both types of water; however, bicarbonate concentrations are elevated for seepage-impacted water. These relationships are illustrated by the median concentrations of sulfate, calcium and bicarbonate in the NA test data listed below:



In summary, two sources contribute sulfate to seepage-impacted water:

- 1. Seepage, and
- 2. Background water.

However, these sources to the seepage-impacted water cannot be separated to define individual contributions. This is because natural attenuation removes sulfate from impacted water through gypsum precipitation and sulfate is added to the background water from the natural formation.

# **3.3.4 TDS in the Conceptual Model**

TDS was not specifically discussed as part of the conceptual model because, as mentioned previously, sulfate is the primary constituent comprising TDS (see Figure 3-1) and therefore is the controlling factor determining whether TDS concentrations exceed the standard (Earth Tech 2000a; Section 3.2, page 3-3, Figure 19; and NRC 1996; page 12,  $3<sup>rd</sup>$  paragraph, Figure 15). TDS concentrations exceed the standard both on and off-site at every well with sulfate

concentrations exceeding the standard, including the unimpacted wells. The only exceptions are Well 509 D where TDS concentrations exceed the standard but sulfate does not, and EPA 23 where sulfate concentrations exceed the standard but TDS does not.

# **3.3.5 Potential Receptors**

Currently there are no alluvial wells used for drinking water supply within the projected extent of the seepage-impacted water outside the property boundary (approximately 1,570 feet; see Figure 2-4, Note 2). This area is sparsely populated and, according to Figure 9 in EPA's *Five-Year Review Report* (EPA 1998), the closest downgradient alluvial well is located approximately 0.76 mile, or 4,000 feet, downgradient from the property boundary. The EPA figure has been reproduced as Figure 3-12 in this report for ease of reference. At the current projected rate of migration for the seepage-impacted water (approximately 77 feet per year), the impacted water would travel approximately 50 years before reaching this location.

The effect of the seepage-impacted water on potential receptors would be no different than that from the unimpacted water other than increased bicarbonate. Sulfate and TDS concentrations in the seepage-impacted water outside the property boundary are similar to and may be lower than background concentrations. Also, no constituents that pose a health risk because of chronic toxicity or cancer potential are present in concentrations exceeding the standards at or beyond the property boundary.

# **3.4 EVALUATION OF RESTORATION POTENTIAL**

# **3.4.1 Source Control Measures**

The source of the seepage-impacted water in the Southwest Alluvium is the tailings impoundment, shown on Figure 2-1, where waste from the uranium ore milling process was discharged. The South Cell of the tailings impoundment, the primary source of seepage to the Southwest Alluvium, was used for a period of only two years, from May 1977 through July 1979. After that time tailings were discharged only to the Central and North Cells. Beginning in 1980 the tailings were neutralized, thereby providing remediation of the source by chemical means. Final source control measures were implemented beginning in 1989 in accordance with the *Reclamation Plan* (Canonie 1991a; Section 1.9.2, pages 12 to 13, Sections 4.0 and 5.0) and the requirements of the NRC. These measures included:

- Grading the tailings to achieve positive drainage off the pile and minimize infiltration
- Placement of the interim compacted soil cover (completed in 1991)
- Placement of the final reclamation cover excluding the area covered by the evaporation ponds (completed in 1996)

The source remediation activities are documented in the as-built reports prepared at the end of each construction season. Also, NRC performed regular inspections to ensure that the reclamation activities were completed according to the approved plan.

A primary goal for the tailings reclamation design was to minimize infiltration into and seepage from the tailings. As noted in EPA's *Five-Year Review Report* this goal has been achieved:

"Results of these calculations suggest that transient drainage is nearly complete, with present seepage rates from the tailings of 1 x 10<sup>-7</sup> cm/s or less." (EPA 1998, Section 3.3, page 20,  $2^{nd}$  paragraph,  $1^{st}$  sentence).

"NRC requires 90 percent compaction before final covers can be put on the tailings pile. To this effect United Nuclear was required to put in nine settlement markers to measure compaction in the covered tailings pile. According to a[n] inspection report by NRC in January 1995, settlement versus log time plots appear to indicate that 90 percent compaction has already been reached after 130 days of the placement of the interim cover. In addition, prior to placement of the interim cover, the moisture content of the tailings were very low. Thus it would be reasonable to estimate the leaching would not be significant, since the tailings were already dry at the time of placement of the cover, and the tailings under cover have been compacted in excess of 90%, and since the final cover has a permeability of 10<sup>-7</sup> cm/s." (EPA 1998, Section 3.3, pages 20 to 21, 3<sup>rd</sup> paragraph).

# **3.4.2 Remedial Action Performance Analysis**

Active remediation of the Southwest Alluvium was implemented concurrently with the source remediation activities. The remedial action system consists of four extraction wells (Wells 801, 802, 803 and 808), which are located, as required by the NRC and EPA, upgradient from the property boundary and downgradient from the source area (Figure 2-1) (United Nuclear 1989; Section 2.2.4, page 18). The purpose of the wells was to create a hydraulic barrier to groundwater flow while the source was being remediated (EPA 1988b; page 3, bullet No. 4). As noted in Section 3.3 above, seepage had already migrated past the property boundary by 1982, seven years before the active remediation system was installed. Therefore the wells served to intercept only the later stages of tailings seepage.

The remedial action system operated for 12 years, from November 1989 through January 2001, when the system was turned off to implement the NA test. The only modifications to the system during its operation were:

- Well 808 was added to the system in 1991 at the request of the NRC to enhance the performance of wells in creating a hydraulic barrier (Canonie 1991b; Section 1.2.3, page  $7, 2<sup>nd</sup>$  paragraph and Section 4.2, page 62, 1<sup>st</sup> paragraph).
- Well 801 was decommissioned in 1999 because it met the decommissioning criteria (pumping rate less than 1.0 gpm [Earth Tech 1999; Extraction Systems - Southwest Alluvium, page 2, 2<sup>nd</sup> paragraph; and EPA 1998, Section 5.2, 3<sup>rd</sup> bullet]).

As required in the Administrative Order (EPA 1989) and the NRC Source Materials License SUA 1475, an annual evaluation of performance was submitted at the end of each year of operation. As documented in the Annual Reports (Canonie 1989b through 1995; Smith Technology Corporation 1995 and 1996; Rust Environment and Infrastructure 1997; Earth Tech 1998 through 2002a) and the water level recovery documented in Section 2.0 of this report, the system was successful in capturing seepage, and removing contaminant mass. However, 99 percent of the total constituent mass removed was composed of sulfate and TDS and no change in constituent concentrations was evident (see Annual Reports for years 1991 through 2000, mass extraction calculations and discussions).

In September 1998 EPA issued its *Five-Year Review Report,* which recognized that the remedial action system had met As Low As Reasonably Achievable (ALARA) goals. As stated in Section 5.2 of the *Five-Year Review Report:*

"The ground water recovery system in the Southwest Alluvium is providing an adequate barrier to contaminant migration. However, little progress has been made toward reaching cleanup levels in the EPA ROD/NRC license for  $NO<sub>3</sub>$ ,  $SO<sub>4</sub>$ , and TDS. The measured concentrations of these constituents have shown little change over time. It is therefore recommended that United Nuclear apply for alternate concentration levels for the Southwest Alluvium. However, if United Nuclear determines that a Technical Impracticability Waiver (TI Waiver) or ALARA demonstration is more appropriate, then United Nuclear may pursue these options as well."

#### and in Section 4.2 of the *Five-Year Review Report:*

"It appears that the Southwest Alluvium is approaching one of the scenarios stated in the ROD. Specifically, that clean-up levels cannot be reached in a reasonable timeframe."

United Nuclear continued to operate the wells until January 2001 when they were shut off for the NA test. The test demonstrated that the tailings seepage is naturally attenuated by the alluvium and that active remediation is no more effective than the natural system in controlling migration of constituents of concern.

As discussed in Section 2.0, turning off the wells allowed additional seepage to migrate as indicated by the increasing trend in the indicator parameters (bicarbonate and chloride). This increase is most evident at the extraction and nearby downgradient monitoring wells indicating that the remedial action system was capturing some seepage-impacted water, but with no real benefit. Overall, sulfate concentrations actually exhibited a decreasing trend during the NA test. The other regulated constituents exhibited no change in trend.

The pattern observed in the data from the extraction and nearby downgradient monitoring wells corresponds with the pattern in the data from the wells further downgradient (Wells GW 1, GW 2, GW 3 and 624) where the seepage had migrated before the remedial action was implemented. Chloride and bicarbonate increased, sulfate concentrations fluctuated, and metals, radionuclides and chloroform were either not detected or were at concentrations below the site standards. These patterns in constituent concentrations occurred before, during and after the remedial action wells were operated. The fact that water quality remained unchanged in the downgradient seepage-impacted area confirms that the natural system rather than the active remediation system has been the primary mechanism controlling the effects of seepage impacts.

#### **3.4.3 Restoration Timeframe Analysis**

The restoration timeframe for sulfate (and correspondingly TDS) concentrations to meet the site standards is controlled by the geochemical mechanisms discussed above. In its *Five-Year Review Report,* the EPA recognized that sulfate and TDS concentrations in the unimpacted background water exceed the site standards and that the concentrations will not change substantially in response to remediation efforts. Therefore restoration of the groundwater to meet the standards is clearly beyond the realm of active remediation.

However, if restoration timeframes are evaluated in terms of natural attenuation, it is clear that restoration occurred rapidly. As noted in Section 3.3, the tailings liquid typically had sulfate concentrations of about 57,000 mg/L. Concentrations as high as 144,000 mg/L were reported in the North Cell. As illustrated on Figure 3-13, neutralization within the tailings impoundment reduced concentrations by 73 percent to 15,200 mg/L (Lysimeter G-6 and Well 634 in the South Cell [Canonie 1988; Tables 2.6 and 2.9]).

By the time seepage contacted the Southwest Alluvium groundwater and migrated downgradient to Well 801, the neutralization process in the alluvial material and groundwater had reduced concentrations another 19 percent to about 4,600 mg/L (value reported for Well 801 in October 1989 prior to turning on the remedial action system). The data from Well 801 was used for this comparison because this well has consistently had the highest sulfate concentrations in the seepage-impacted area. An additional 5 percent decrease in the original sulfate concentrations occurs between Well 801 and the property boundary as represented by Well GW 1 (value reported for Well GW 1 in October 1989 prior to turning on the remedial action system). In total, the natural geochemical processes reduced the sulfate concentrations by as much as 97 percent by the time the seepage-impacted water reached the property boundary.

Figure 3-14 shows that a similar pattern is evident for TDS. TDS concentrations in typical tailings liquid were about 67,000 mg/L. Geochemical processes within the tailings material reduced these concentrations by 69 percent to about 11,100 mg/L (Canonie 1988; Tables 2.6 and 2.9). An additional reduction of about 17 percent resulted in a TDS concentration of about 9,200 mg/L in Well 801 (value reported in October 1989 prior to turning on the remedial action system). TDS concentrations at the property boundary (Well GW 1, October 1989 prior to turning on the remedial action system) were reduced another 6 percent to 5,400 mg/L. Total reduction of TDS concentrations by the time the seepage-impacted water reached the property boundary was about 92 percent.

The reduction in chloride concentrations was also evaluated to verify the contribution of chemical attenuation in reducing sulfate and TDS concentrations. Chloride is a non-reactive, conservative species that typically migrates coincident with groundwater. Reductions in chloride concentrations do occur but typically they are much smaller than decreases for more reactive constituents and result primarily from physical processes such as dilution and dispersion. The magnitude of the chloride concentration decrease can be applied to the other constituents (e.g., sulfate and TDS) to estimate the portion of concentration decrease that is attributable to physical processes and that portion attributable to chemical attenuation processes.

Chloride concentrations in the tailings were reported at 550 mg/L (Science Applications, Inc. 1980; Table 2-3) while chloride concentrations in Wells 801 and GW 1 in October 1989 were reported to be 246 mg/L and 236 mg/L, respectively. Therefore chloride concentrations reduced by 2.2 to 2.3 times between the tailings and the downgradient area prior to turning on the remedial action system wells. Applying this concentration reduction to sulfate, the concentration of sulfate at Wells 801 and GW 1 would be predicted to be 25,909 mg/L and 24,783 mg/L, respectively, if only the physical processes were reducing the constituent concentrations. However, these concentrations are 6 to 13 times greater than the concentrations that have been reported at these wells over time. Clearly, chemical attenuation processes are successfully reducing sulfate (and correspondingly TDS) concentrations to background levels before the seepage-impacted water migrates to the property boundary.

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This analysis shows that in terms of the natural processes, the primary restoration was completed within the tailings and unsaturated alluvium before the seepage contacted the groundwater. More importantly, this restoration was completed with no expenditure of energy and without generation, or corresponding disposal, of waste materials. Mechanical treatment of water with the levels of sulfate and TDS reported in the tailings would require large amounts of energy and generate large amounts of waste solids that would require disposal. Essentially the restoration is already complete, and any further reductions in sulfate concentration will be determined by the chemical equilibrium within the saturated Southwest Alluvium.

#### **3.4.4 Other Applicable Technologies**

A detailed review of remedial options was documented in the FS (EPA 1988a). The FS selected groundwater extraction as the remedy of choice. Other technologies were considered less effective in reducing constituent concentrations and for protection of human health and the environment. However, as demonstrated by the results of the NA test and the remedial action to date, natural processes are the most efficient, cost effective, and protective technology available. The natural processes reduced source sulfate and TDS concentrations by at least 90 percent within a short distance from the source area. The natural system also reduced sulfate concentrations to near and below background levels inside and outside the property boundary before active remediation was implemented and will continue to do so as long as the alluvium remains saturated. Currently, all of the off-site wells have sulfate concentrations less than 3,000 mg/L and TDS concentrations less than 5,500 mg/L.

The alternatives evaluated in the FS included the following:

- 1. **No action**  No remedial action would be implemented.
- 2. **Limited Action**  No action plus use of institutional controls to limit access to seepageimpacted water.
- 3 **Containment and Surface Discharge** Containment using a series of wells to create a hydraulic barrier at the downgradient edge of contamination, treating the water and then discharging the treated water into the Pipeline Arroyo downgradient of the containment wells.

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- 4 **Containment, Selective Extraction, and Surface Discharge -** Same as Alternative 3 with the addition of wells within the seepage-impacted area with the highest constituent concentrations.
- 5 **Containment, Selective Extraction, High Flow-Rate Reinjection, and Surface Discharge** - Same as Alternative 4 with the addition of reinjection wells located within the seepage-impacted area to flush the contaminated area.

In the ROD (EPA 1988b; page 3, bullet No. 4), the EPA selected Altemative 3 with the modification that the extracted water would be disposed by evaporation. EPA's assessment eliminated Alternatives 1 and 2 as not being protective of human health because the predicted time frame for cleanup was too long. Alternatives 4 and 5 were eliminated because the costs for these systems were substantially greater than for Alternative 3, but the effectiveness (i.e., reducing constituent concentrations in a reasonable time frame) was not improved.

Two additional in-situ treatment technologies could be considered. A permeable reactive barrier could be installed across the alluvial valley or a substrate such as Hydrogen Release Compound<sup>®</sup>  $(HRC^{\circledast})$  could be injected into the alluvium. The purpose of these technologies would be to decrease sulfate concentrations by creating locally reducing conditions. It is questionable whether either of these technologies would function, given the hydrologic and geochemical conditions. In addition, the empirical data show that the alluvial system is already attenuating sulfate as indicated by the fact that sulfate concentrations are at or below background concentrations before the impacted water exits the property boundary. Therefore adding another system would simply add unnecessary cost associated with installation, operation and maintenance with dubious results.

#### 3.5 COST ESTIMATE

The cost estimate for this TI evaluation focuses on continued operation of the existing remedy. Alternative remedies were considered impracticable given that natural processes have been and will continue to be as effective in reducing the sulfate concentrations to background levels. The cost of operating the existing system is estimated in Table 3.1. If the remedial action system is decommissioned and remedial action converts to solely monitored natural attenuation, costs are only for quarterly sampling. These costs are also estimated in Table 3.1.

The cost of continuing active remediation should be considered in terms of the effectiveness of the system in reducing sulfate and TDS concentrations below the standards. Using this approach, the costs for active remediation are unreasonably high considering that there is no benefit gained from active remediation. Gypsum precipitation in the tailings and alluvial system rather than the active remedial system has reduced the concentrations of sulfate and TDS to natural levels both inside and outside the property boundary. This process has been ongoing since 1977 when tailings were first discharged, as is evident from the constituent concentrations in the downgradient wells.

#### **4.0 SUMMARY AND RECOMMENDATIONS**

The results of the natural attenuation test demonstrate that turning off the extraction wells does not have an adverse effect on water quality. The results also demonstrate that the natural system is as effective as, or even more effective than, pumping for controlling migration of constituents of concern.

The TI evaluation shows that natural attenuation reduces sulfate and TDS concentrations to unimpacted background levels. Physical and geochemical processes have been reducing these concentrations since tailings discharge began, as is evident from sulfate concentrations equivalent to the unimpacted background concentrations measured in wells located at the property boundary prior to turning on the remedial action system wells. Although the remediation system did remove sulfate and TDS mass, the concentrations remained similar to those previously achieved by the natural system.

Whether the sulfate and TDS concentrations reduce further to the site standard is dependent on natural geochemical processes, and not at all on continuing the current pumping/evaporation corrective action program. Also, under the federal drinking water standards, sulfate and TDS are listed under the secondary drinking water standards, which control contaminants in drinking water that primarily affect aesthetic qualities relating to public acceptance of drinking water. Unlike constituents such as metals, radionuclides, or some organic compounds, sulfate and TDS are not carcinogens and do not have an immediate adverse health effect. The secondary standards are not federally enforceable but are intended as guidelines. Therefore a TI waiver is requested for sulfate and TDS.

Based on the results of the NA test and the TI evaluation, the following recommendations are made for the Southwest Alluvium corrective action system:

- 1. Decommission the pumping wells.
- 2. Continue to perform monitoring on an annual basis because the water quality is stable.
- 3. Proceed to closure of the Southwest Alluvium remedial action system using a combination of:
	- Monitored Natural Attenuation for chloride, chloroform, metals, and radionuclides
	- \* **Technical Impracticability Waiver-** for sulfate and TDS for the TI zone shown on Figure 3-2

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TABLES

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### TABLE 2.1

### WELLS INCLUDED IN THE SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST



Notes:

' Pumping wells turned off in January 2001 after final baseline samples were collected. Well 801 is the exception, see Note 2.

<sup>2</sup> Well 801 was turned off at the end of July 1999 because it met decommissioning criteria. Sample collection ceased after the first

quarter 2000. Well 801 water quality is included in the test program, therefore sampling recommenced January 2001.

<sup>3</sup> Well 808 was not included in the Performance Monitoring Program, therefore no data are available prior to January 2001.

# $\text{Table 2.2}$ **WATER QUALITY DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST**



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 $\label{eq:2} \frac{1}{2} \int_{\mathbb{R}^3} \frac{1}{\sqrt{2}} \, \mathrm{d} \xi \, \mathrm$ 

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# *r***ABLE** 2.2 WATER QUALITY DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST



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# $\prod_{i=1}^{N}$ WATER QUALITY DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST

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#### TABLE **3.1** COST ANALYSIS SUMMARY SOUTHWEST ALLUVIUM FINAL REPORT AND TI EVALUATION

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## **Existing Remedial Action System**



#### **Natural Attenuation Monitoring**



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FIGURES

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**FIGURE 2-3A** SOUTHWEST ALLUVIUM WATER LEVELS OVER TIME



**FIGURE 2-3B SOUTHWEST ALLUVIUM** PUMPING WELL WATER LEVELS OVER TIME



# **FIGURE 2-3C SOUTHWEST ALLUVIUM MONITORING WELL WATER LEVELS OVER TIME**

SWA Natural Attenuation Test Final Quarterly Report and TI Evaluation, September 2002





**FIGURE 2-5** CHLORIDE CONCENTRATIONS OVER **TIME**









FIGURE 3-1 PRIMARY COMPONENTS OF TDS IN SOUTHWEST ALLUVIUM GROUNDWATER

Source: Figure **19** of the Southwest Alluvium Geochmistry Report, Earth Tech, 2000a.





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FIGURE 3-3 CONCEPTUAL MODEL DEVELOPMENT OF ALLUVIAL SATURATION

# Neutralization Capacity of Alluvium



Southwest Alluvium Seepage Impacts Over Time



Well GW 1



#### Well GW 3



**FIGURE 3-5 CHLORIDE AND BICARBONATE TRENDS** IN WELLS GW 1 AND GW 3





 $CI5$ **FIGURE 3-6 CHLORIDE AND BICARBONATE TRENDS** IN WELLS 624 AND EPA 25



Sulfate Concentration, mg/L



 $C/C$ FIGURE 3-7 SOUTHWEST ALLUVIUM GYPSUM SATURATION INDICES



CALCITE SATURATION INDICES





3.50  $3.00$ Bicarbonate-to-Calcium Ratio 2.50  $2.00$ 1.50 1.00  $0.50$ **Bicarbonate-to-Calcium Ratio** in Calcite  $0.00 -$ 1/14/2004 4/19/2001 1/31/1993 10/28/1995 7/24/1998 8/11/1987 5/7/1990 **Date**  $-627$   $-624$   $-6001$   $-6002$   $-6003$   $-6003$   $-6003$   $-6003$   $-6003$  $C19$ **FIGURE 3-10** 

**BICARBONATE-TO-CALCIUM RATIOS IN DOWNGRADIENT SOUTHWEST ALLUVIUM GROUNDWATER** 



DOWNGRADIENT SOUTHWEST **ALLUVIUM GROUNDWATER**



Source: Figure 9, EPA Five-Year Review Report Figure 3-12 Downgradient Receptors



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**FIGURE 3-13** ATTENUATION OF SULFATE BY NATURAL PROCESSES



**FIGURE 3-14** ATTENUATION OF TDS BY NATURAL PROCESSES

APPENDIX A

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GRAPHS OF CONSTITUENT CONCENTRATIONS OVER TIME

## FIGURE A.1 TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION

*32114/ProjlSubmirtals/SWYA NA Test! Final Report TIAR2 Graphs readable/509 D (2) November 2002*

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# FIGURE A.1 TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION

*32114/ProjlSubmittals/SWA NA Testl Final Report TAR2 Graphs readable/509 D (2) November 2002*

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# FIGURE A.2 TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT ANb **Tl** EVALUATION



*<sup>32114</sup>IProjISubmittalsISWA NA TestIFinal Report T11R2 Graphs readablel624 (2) November 2002*

# FIGURE A.3 TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION



*32114/Proj/Submittals/SWA NA Test/Final Report TI/R2 Graphs readable/627 (2)*

*November 2002*

# **FIGURE A.4** TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST **FINAL REPORT AND TI EVALUATION**



32114/Proj/Submittals/SWA NA Test/ Final Report TI/R2 Graphs readable/632 (2)

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*32114/ProjSubmittals/STYA NA Testl Final Report TI/R2 Graphs readable/632 (2) November 2002*



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# FIGURE A.5 TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION



*32114/Proj/Submittals/SWA NA Testl Final Report Tl/R2 Graphs readable/801 (2) November 2002*

# FIGURE A.5 TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION

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### FIGURE A.6 TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION



*32114/ProjlSubmittals/SWA NA Test! Final Report Tl/R2 Graphs readable/802 (2) November 2002*

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# FIGURE A.6 TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION

*321)4/Proj/Submittals/SJVA NA Test! Final Report Tl/R2 Graphs readable/802 (2) November 2002*

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#### **FIGURE A.7** TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION



32114/Proj/Submittals/SWA NA Test/ Final ReportTI/R2 Graphs readable/803 (2)

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## FIGURE A.7 TREND ANALYSIS COMPARING BASELINE AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION

*32114/ProjlSubmittals/SWYA NA Test! Final ReportTl/R2 Graphs readable/803 (2) November 2002*



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#### **FIGURE A.8 TREND ANALYSIS COMPARING BACKGROUND AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION**

### FIGURE A.9 TREND ANALYSIS COMPARING BACKGROUND AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION



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### FIGURE A.10 TREND ANALYSIS COMPARING BACKGROUND AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION



*32114/ProjlSubmittals/SWA NA Test/Final Report TI Evatuation/R2 Graphs2read/EPA 25*

*November 2002*

### FIGURE A.11 TREND ANALYSIS COMPARING BACKGROUND AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST **FINAL REPORT AND TI EVALUATION**



32114/Proj/Submittals/SWA NA Test/Final Report TI/R2 Graphs2read/EPA 28

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### **FIGURE A.12 TREND ANALYSIS COMPARING BACKGROUND AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND TI EVALUATION**



*32114/Proj/Submittals/SWA NA Test/Final Report Tl/R2 Graphs2read/GW I*

*November 2002*

#### FIGURE A.13 TREND ANALYSIS COMPARING BACKGROUND AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST FINAL REPORT AND **TI** EVALUATION



*32114/Proj/Submittals/SWVA NA Test/Final Report TI/R2 Graphs2read/GW 2*

*November 2002*

#### **FIGURE A.14** TREND ANALYSIS COMPARING BACKGROUND AND TEST DATA SOUTHWEST ALLUVIUM NATURAL ATTENUATION TEST **FINAL REPORT AND TI EVALUATION**

