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November 21, 2005

Mr. Mark Purcell
Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200 (6SF-LP)
Dallas, Texas 75202-2733

Re: Comments on the October 2005 Report Titled "UNC Church Rock Site In-Situ Alkalinity Stabilization Pilot Study", prepared by Blasland, Bouck & Lee, Inc.; UNC Church Rock Superfund Site EPA ID# NMD030443303.

Dear Mr. Purcell:

Thank you for providing the New Mexico Environment Department (NMED) with the opportunity to comment on the UNC Church Rock In-Situ Alkalinity Stabilization Pilot Study. NMED supports the initiative to conduct a pilot test; however, the plan does not meet the substantive requirements for the underground injection control (UIC) Permit under NMAC 20.6.2.

Tables in Section 2.2 and Table 3-1 indicate that chloride, nitrate, and uranium concentrations in the source water for injection may be higher than the area where the water will be injected. These analyte concentrations are also higher than EPA's maximum contaminant limit or state standards. NMED would not be able to approve a UIC permit because the injection well, classified as a Class V well, cannot be allowed to degrade the ground water beyond the existing concentrations unless the existing concentrations are below the numerical standards in 20.6.2.3103 NMAC, in which case degradation is allowed up to the numerical standard (NMAC 20.6.2.3101A(1) and (2), 20.6.2.5002(5)(d), 20.6.2.5006 and 20.6.2.3109D). These numerical standards are 10 mg/L for nitrate, 0.03 mg/L for uranium, and 250 mg/L for chloride.

We offer the following additional comments:

NMED requests the opportunity to review and comment on the sampling results from the proposed injectant well NA-02 to determine if water from this well meets the UIC permit requirements.

NMED requests the opportunity to review the batch study results.

The process of extracting and reinjecting ground water may cause the water to be oxygen enriched, which would result in increasing the solubility of uranium and other analytes. UNC needs to address how they will prevent increased concentrations of contaminants of concern either by preventing the water from becoming oxygen enriched or through other means.

NMED requests that nitrate be added to the list of analytes to be monitored during the pilot study.

Please let me know if you have any questions on these comments or any other issues concerning the UNC Church Rock Site. I can be reached by telephone at (505) 827-2434 or by e-mail at: robin.brown@state.nm.us.

Sincerely,



Robin Brown
Environmental Scientist and Specialist
Superfund Oversight Section

Xc: Bill von Till, Project Manager/Hydrogeologist, United States Nuclear Regulatory Commission, Mail Stop: T8A33, Washington, DC 20555-0001.
Diane Malone, Navajo Nation EPA Superfund Program, P.O. Box 2946, Window Rock, AZ 86515.
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