



POOR ORIGINAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street

San Francisco, Ca. 94105

PDP

Wm-28

TSC 13

Mr. Gregory G. Eadie  
Uranium Recovery Licensing Branch  
Division of Waste Management  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Summary of the Church Rock Environmental Impact Assessment  
Efforts (UNC Spill)

Dear Mr. Eadie:

This is in response to your letter of December 7, 1979 transmitting and soliciting our comments concerning the referenced document.

After a careful review, we find that several statements made in subheading 2), page 2 are inaccurate.

- (1) At present, surface water monitoring has been expanded to include other representative locations. Though sampling at these locations is not periodic (it is performed in response to large/substantial rainfall), it will show conditions in other areas of the Rio Puerco and the Little Colorado River as far downstream as Cameron, Arizona.
- (2) The word "ending" is not appropriate. Sampling will continue periodically, if necessary.
- (3) Ground water monitoring is a joint EPA--IHS effort, and not only the IHS.
- (4) The present ground water monitoring program is sampling of local Navajo Wells. (The statement that ". . .no well sampling program. . . .to monitor the local Navajo wells. . . ." is completely in error).

In addition, we feel that the following additional work is appropriate:

- (1) With regards to ground water, we (EPA) will compile a report as appropriate containing:



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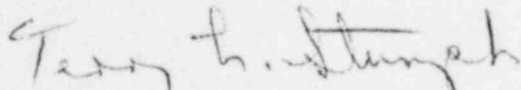
- (a) Information on each well tested (depth, geological conditions, construction details, etc.), and
- (b) The data accumulated in the first seven (7) months of sampling (one month of weekly sampling and six (6) months of monthly sampling).

Note: Development of item (a) would require cooperation with the IHS and some field work by EPA staff.

- (2) We plan to meet with representatives of participating agencies to determine how the monitoring program should proceed.

We appreciate the opportunity to comment on your report. Please do not hesitate to contact me (415/FTS 556-2270) if I can be of further assistance.

Sincerely yours,



Terry L. Stumph, Chief  
Water Branch  
Surveillance & Analysis Division