

ENVIRONMENTAL WAYS OFF MENT DIVISION 7.0. Cox 303, Santa Fe, New Mexico 87504-0963 (505) 854-0020

Steven Asher, Dire Lor

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 11, 1983

William B. Hathaway
Deputy Director
Air & Waste Management Division (6AW-Dep)
ENVIRONMENTAL PROTECTION AGENCY
Region 6
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Hathaway:

Thank you for giving the New Mexico Environmental Improvement Division the opportunity to review the draft scope of services for the Remedial Investigation/Feasibility Study (RI/FS) submitted to EPA by the firm CH₂M-Hill for the UNC Church Rock site. FID staff, EPA staff, and EPA consultants including CH₂M-Hill met and discussed this scope of services in Santa Fe and Albuquerque on September 26 and 27, 1983. At that time, EID technical staff orally provided comments to CH₂M-Hill and the EPA and had several concerns with the draft document.

I would like to take this opportunity to convey to you, in writing, that the EID has the following major concerns with the draft scope of services:

- The availability of extensive technical information in EID files which has not been assessed by CH₂M-Hill.
- 2. State and Federal Regulations governing the EID review program which have not been totally assessed by CH₂M-Hill.
- 3. The need for and utility of the information to be obtained from tasks 3.1 and 3.2 and certain items in task 3.3.
- 4. The lack of emphasis for and the general scope of tasks 3.4 and 3.5. The EID is under the impression that the RI/FS is partially to determine the nature and extent of the environmental problems at the Church Rock site. The scope of services is weak in these tasks.
- 5. The lack of details provided for certain aspects of tasks 3.4 and 3.5.

9804230332 831011 PDR ADDCK 04008907 C PDR Page 2 William B. Hathaway Control 11,1983

If these concerns and the related details expressed in September 26-27 meetings can be adequately addressed in the final scope of services, the EID would concur with that document. Once the scope of services has been finalized, I request that EPA initiate the RI/FS at the Church Rock site. The EID staff is available to assist Mr. Larry Wright of your staff with any problems he may encounter and will continue to review and 'e actively involved in EPA's Superfund Activities at Church Rock.

If you have any questions concerning our comments please telephone Mr. Richard Raymondi of the EID staff at the telephone number listed above (ext. 261).

Sincerely,

Steven Asher DIRECTOR

SA:RR:jba

cc: Ron Conrad, EID Ground Water Section, Santa Fe Kent Breese, EID Radiation Protection Bureau, Santa Fe