ABANDONED URANIUM MINES PROJECT ATLAS

PROJECT OVERVIEW

STUDY AREA
The Navajo Nation is located on the Colorado Plateau and encompasses over 25,000 square miles across Arizona, New Mexico, and Utah. The distinctive physiography of this region has resulted in a major mining area for uranium. The Navajo Nation includes intensely dissected rocky regions and has elevations that range from about 3,000 feet to slightly over 10,000 feet. The region is known for a wide variety of topographies that include broad upland plains, rugged tablelands with dramatic buttes and mesas, and major mountainous regions. The varied topography results in different climate and vegetation regimes. These include warm, arid desert climates with sparse slow growing grasses and browse plants; intermediate steppe climates with grasses, sagebrushes, and pinyon-juniper; and cold, subhumid mountain climates where pine, oaks, and associated grasses and shrubs are found.

The resident population of the Navajo Nation has been estimated (1995) at nearly 170,000. This provides an overall density of less than 7 people per square mile. Navajo Chapters provide an administrative unit similar to counties or parishes. There are currently 110 Chapters throughout the Navajo Nation.

MINING HISTORY
Mining for uranium and vanadium ore was conducted on Navajo Lands from the 1940s through the 1960s. According to Dare (1961) and Chenoweth (1984), mining continued for more than 25 years on land held in trust for the Navajo Nation by the U.S. Department of Interior, Bureau of Indian Affairs (BIA). After mining activities stopped, the mining rights were returned to the Navajo Nation.

The mines were located in geologic terrain that contains deposits of uranium and vanadium ores in sedimentary formations. The ore deposits contain naturally occurring metals and radionuclides: parent isotopes uranium$^{238}$, thorium$^{232}$, and uranium$^{235}$, and daughter isotopes from their decay series (uranium, thorium, and actinium decay series, respectively). The ore deposits vary within regions, but are generally located at shallow depths beneath ground surfaces or exposed on slopes and mesa tops. Ore bodies at or near the surface were excavated, while buried ore bodies and ore bodies exposed on canyon walls were mined by digging down to the ore or into the face of a hillside or canyon wall, creating mine entrances, vertical shafts and/or horizontal tunnels (adits).

Excavation of uranium ore bodies near the surface, such as on mesa tops, generally resulted in shallow pits, often less than 10 feet deep, with unexcavated low-grade ore at the base and low-grade ore debris piles on the surface. Mining of ore bodies exposed in canyon walls or on the sides of mesas removed the exposed ore that emitted high levels of gamma radiation. Below the excavations the large debris piles or talus slopes were left behind. The pits, shafts and other mine structures remained open.

PROJECT BACKGROUND
Concern about the risk of excessive exposure to radiation from mining debris remaining from historical mining activities led to the July 1993 Congressional Committee report titled “Deep Pockets: Taxpayer Liability for Environmental Contamination.” At congressional hearings on November 4, 1993 the Navajo Nation presented testimony concerning abandoned uranium mines and requested assistance in determining if the old mines pose a health risk to residents. The U.S. Environmental Protection Agency (USEPA) presented testimony to describe its federal authority under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and how the USEPA could assist the tribe. The U.S. Department of Energy (USDOE) and the U.S. Department of Interior (USDOI), the Navajo Nation Environmental Protection Agency (NNEPA) and the Navajo Nation Abandoned Mine Lands Reclamation Department (NNAMLRD) also participated in the hearings.
The USEPA Region 9 Abandoned Uranium Mines Project began in 1994 with investigations in the King Tutt Mesa study area located in the Red Valley Chapter of the Navajo Nation. The investigations were conducted with the assistance of the NNEPA Superfund Program, Bechtel Environmental, and the USDOE Remote Sensing Laboratory. The overall objective of the investigation was to determine whether abandoned uranium/vanadium mines and related mine features posed a significant risk to human health, and to identify areas or features requiring action to reduce exposure. Additional objectives of the investigation were to develop a preliminary protocol for evaluation of other uranium mining areas and to outline community involvement steps to assist future investigators in working with other Navajo communities.

In June 1997, the USEPA Region 9 and Bechtel Environmental issued a document titled “Integrated Assessment, Draft for Comment, Navajo Uranium Mines-King Tutt Mesa Study Area, Red Valley Chapter, Navajo Nation, Oak Spring, New Mexico 87420, Site EPA ID Number: NND 986667434”. The results of the initial King Tutt Mesa Study led to the development of a three-step process for investigating other areas with abandoned uranium mines:

1. A regional radiation survey conducted by helicopter to find sources of radiation in old mining areas.
2. The testing of water used for human consumption.
3. The surveying of homes constructed with materials from the mines.

Various planning materials were collected and reviewed prior to extending the project. Numerous historical records and reports of mining activity in the Navajo Nation were assembled. The results of studies of similar environmental situations in other mining areas were reviewed. These were combined with the lessons learned from the King Tutt Mesa study to expand the project to other mining areas across the Navajo Nation. Through Interagency Agreements with USDOE and the USACE, senior scientists and field personnel brought expert technologies for surveys and sampling to six mining districts known to be areas of historical mining and exploration for uranium.

The USDOE Aerial Measuring System (AMS) survey capability was used to measure and map radiation sources within known uranium mining areas. The same type of helicopter surveys that were used in 1994 in the Four Corners Area were conducted in 1997, 1998 and 1999 in the other areas. A total of 1,144 square miles were surveyed. In March 1998 the USACE joined the project to investigate water used for human consumption and home construction using mine waste rock in the areas of the old uranium mining activities.

The lead agency was the USEPA Region 9, with Patti Collins as the Project Manager-Senior Scientist and Vicki Rosen as the Community Involvement Coordinator. Working with the USEPA were agencies including NNEPA, NNAMLRD, USDOE, and USACE, as well as academic and scientific institutions.

**PROJECT PURPOSE**

The purpose of the Abandoned Uranium Mines Project was to identify the radiation sources, characterize the exposure, and recommend methods to reduce radiation exposure from abandoned uranium mines on the Navajo Nation. From the beginning of the field investigations it was recognized that there were several categories of potential risk due to exposure to radiation, metals, and other hazards related to abandoned uranium mines and their setting. The approach to these sources of potential exposure was to focus first on identifying the sources of greatest potential exposure and thus the greatest risk to human health. Given the regional geology, the types of ore bodies, mining, transport of ore, and local land use, it was determined that the greatest potential exposures would be through two primary pathways:

1. Internal exposure by consumption of water containing radioactive and/or stable metals.
2. External exposure to radiation from stone masonry of mine waste rock, or other mining materials used for construction in or around homes.

The potential of abandoned mine structures as physical hazards was also recognized. The primary focus of the data collection activities, however, was to identify the radiation sources and to characterize the types of exposure.

In order for the Abandoned Uranium Mines Project to succeed, it was necessary to involve the affected communities and to engage them as active community partners. An important goal of the project was to develop an outreach strategy that would result in a two-way sharing of information. This involved educational efforts to increase understanding and awareness of the mines and their possible effects as well as engaging participation of Chapter Officials to assist in identifying water sources used for human consumption and homes that should be surveyed. To assist in these outreach activities, an important goal of the project was to provide data and results from the various data collection efforts in a format that was easily accessible to the end user. Providing education and outreach about the radiation and working with individual communities living in proximity to the abandoned mines were key components of the project.
ABANDONED URANIUM MINES PROJECT ATLAS

PROJECT OVERVIEW (continued)

METHODOLOGY

Characterization of Risk

Given the limited resources to sample a large area of mining and mine-related activities, a methodology was designed to utilize the resources across a broad area using aerial surveys and high-quality, one-time samples of water used for human consumption. This approach was used since it provided the greatest amount of information from which to begin actions to determine exposures and to focus more detailed investigations if warranted.

External Exposure

The levels of radiation from numerous sources were measured through aerial and field measurements. In order to evaluate the potential exposure to an external radiation source, three factors were considered: the location of the radiation source, the amount of radiation, and its proximity to people and land use. From this information, the risk of the exposure could be determined.

Internal Exposure

The greatest potential exposure to radiation and related metals was determined to be through consumption of water. Over 200 water sources used for human consumption were identified and tested. The calculation of risk posed by consuming water from each of the sources was performed using standard methods. Appendix A.1 (Summary of the Characterization of Risk Leading to Exposure Reduction) provides an explanation of the standard method used to calculate risk.

Community Information and Education

Community Information and Education served two important functions. First, it provided information to the people who were exposed or potentially exposed. The information assisted people in making informed choices about local activities. These included a wide variety of activities such as where to collect water, where to build and where to direct children to play. For example, there were areas where some of the water sources had higher levels of metals such as uranium, yet other local sources were of a better quality. The single most effective and fastest method to reduce possible exposures was for the people who haul water to their homes to know about the condition of their water. This simple step of local education and information was a fast yet effective first step to risk reduction.

Second, education provided the information to help people prevent future exposures. For example, the potential for radiation exposure existed in the construction of new homes and schools located immediately adjacent or on top of old mines or areas of mining activity where radiation sources remain. Different agencies or individuals decide the siting of homes, schools or other structures. Discussions with various agencies, local officials, and others indicated that one of the most effective ways to avoid creating new problems was to share the information about the radiation sources as shown on the area maps with local agencies, schools and community officials. There are generally three ways to inform and educate those in the affected areas: 1) through the grazing official of the local grazing district, 2) through the adults in the family enclaves that form small communities, and 3) through the schools as students take the information home to their families. The simplest form of education, the discussions and explanations that took place during the field operations, proved to be neither complicated nor difficult to do. Emphasis on the timeliness and the quality of the communications was key to the success of education and information.
ABANDONED URANIUM MINES PROJECT ATLAS

PROJECT OVERVIEW (continued)

Survey Areas
A general review of historical mining activities in Arizona, New Mexico and Utah, including the works of Chenoweth, Dare and others, identified 6 mining districts that were the focus of this study. Each of these areas contained numerous abandoned uranium/vanadium mines. The areas were:

- Four Corners
- Monument Valley
- Cameron -Tuba City
- Bidahochi
- Central
- Chinle

Four Corners Area
Mines in this area were adits, shafts, pits or trenches in ore-bearing Salt Wash Member of the Morrison Formation. The area was mined using a combination of conventional blasting techniques and manual labor for the removal of overburden and ore. Extracted ore was manually sorted on site with the higher grades being transported off site to processing mills and the lower grades (proto-ore) remaining on site in debris piles.

Monument Valley Area
During the period 1942 through 1946, three “carnotite” (uranium/vanadium ore) leases in Monument Valley produced a total of 156,237 pounds of vanadium oxide. Among the most productive mines were Monument 1, Alma-Seggin, Fern 1, Utah 1, Big Chief 3 & 4, and Radium Hill. In addition, 4,783 pounds of uranium oxide contained in the Utah 1 lease were sold.

Cameron -Tuba City Area
During its lifetime, the Tuba City mill (operated by Rare Metals Corporation of America) processed 800,000 tons of ore, most of which was generated from the Orphan Lode Mine. Orphan Load closed in 1969. Peak production was in 1956 from Cameron area mines. The most significant Cameron area mines were: Jack Daniels, Charles Huskon 4, Paul Huskon 3, Charles Huskon 3, Charles Huskon 1, and Ramco 20. Rare Metals’ Ramco pits collectively produced about 47,600 tons of ore between 1956 and 1960. Rare Metals also acquired Charles Huskon Mines 1, 3, 5-8, 10-12, 14, 17 and 26 from Arrowhead in 1955. Charles Huskon mines 4, 9, 18, 19 and 20 were operated by UTCO Uranium Corporation from 1956 to 1959. Late production (1961-1963) is recorded from Charles Huskon 1, 3, 6, 10, 11, 12 and 17; Evans Huskon; 2: Jack Daniels; Julius Chee 5; Yazzie 2, 101 and 312; and Section 9 mines.

Bidahochi Area
The most significant Bidahochi mines were Boot Jack Mine, Fern 1 Mine, Bidahochi Butte prospects, and the Calvin Chee prospect. No mining production information was available for this area.

Central Area
Significant mine leases included the Dan Taylor Mine, Tah Chee Wash leases 8 and 31, Rough Rock Slope 9, Begay and Bahe 1, Todecheenie 1, Charley 1, and Etsitty 1. No mining production information was available for this area.

Chinle Area
No detailed information on mining activities was identified for this area.

Sample Site Selection
The protocol developed under the King Tutt Mesa study was used as a guide in selecting additional sample locations for the other areas. Historical maps and records were researched to identify possible mine locations (see page 1.11). Aerial helicopter radiation surveys were flown to measure radiation over suspected mining areas in order to locate the current sources of radiation. Aerial radiation surveys of 41 selected uranium mining areas on the Navajo Nation were conducted over the period of October 1994 through October 1999. The surveys were flown at the request of the USEPA Region 9 and were performed by the USDOE Remote Sensing Laboratory in Las Vegas, Nevada. The purpose of the aerial surveys was to identify possible sites of mines, spoil piles, transfer stations, and other activities related to uranium mining (see Appendix A.3 - USDOE Aerial Measuring System Summary for more detail).

Planning maps for selecting field sample locations were developed using the radiation contour data in conjunction with readily available spring location data (see page 1.15). The planning maps were reviewed in meetings with representatives of the Navajo Nation Chapters. Involving local Chapter Officials in the sample selection process provided local knowledge needed for identifying water sources used for human consumption. In addition, they were able to identify homes built of mine waste rock. The local Chapter Officials were the most knowledgeable source for information about land and water uses in their communities, and they provided important information about what locations should be sampled.
Aerial Radiation Surveys
The project area encompassed 17.5 million acres of rugged terrain in the states of Arizona, New Mexico and Utah. Much of the area is not accessible by roads. Using aerial survey methods to collect data on the locations of radiation source areas was: 1) to help focus the field investigations in areas of current rather than historic radiation (the Navajo Abandoned Mines Land Reclamation Program had been working for a number of years on the reclamation of old mines); 2) to locate and record the old mining activities that were sources of radiation using a method that would be much faster than scouting and measuring at ground level; and 3) to measure the levels of total radiation as well as the individual isotopes, such as Bismuth$^{214}$, that could be extracted through data processing as an indicator of mining activity.

The radiation was measured with instruments mounted on a helicopter. The helicopter was initially flown at an altitude of 150 feet recording the radiation along flight lines placed 250 feet apart. At this altitude, the sensor footprint or ground area being measured was determined to be approximately 300 feet in diameter. After analysis of data collected using this protocol, the line spacing was increased to 300 feet to increase operational data collection efficiency, without loss of data quality.

Each radiation measurement from the aerial instruments provided an average radiation level for the ground sample area. This means the data does not pinpoint the radiation levels within the ground sample area (a footprint approximately 300 feet in diameter under the helicopter). Within the sample area, the radiation source could be evenly distributed or made up of a combination of radiation sources, like a higher-level mine waste debris pile sitting on soil that had lower regional radiation levels. Obtaining finer detail measurements of any individual radiation source required additional ground level measurements.

Field Sampling
USACE field sampling operations included water sampling, home construction surveys, radiation surveys, and mine surveys. Using a format similar to sampling used during the 1994 fieldwork, USEPA Region 9, Bechtel Environmental and the USACE developed the 1998 Field Sampling Plan. All field data collected were of sufficient quality, documentation and verification to be available for use for the USEPA Superfund administration processes including, but not limited to, the various removal and remedial actions intended for exposure reduction.

The purpose of the field water-sampling program was to collect water sample data that would allow evaluation of risks to human health by ingestion of radioactive and stable metals in water. The USACE water-sampling program was designed to collect water sample data that was representative of the condition and quality with respect to stable and radioactive metal concentrations in water sources used for human consumption. The sampling program consisted of collecting one water sample at each well, tap, spring, or tank identified as a source for human consumption. If there was a common source for multiple users, such as a community well or tap, only the common source location would be sampled. All samples were collected as a point-of-use sample designed to duplicate the most likely method in which a person would obtain water for human consumption. The data were collected at levels of precision and accuracy to allow comparison of results against standard benchmarks of human risk of consuming the water. At each site, radiation levels were monitored and recorded. Radiation levels were recorded at a standard height of one meter from the ground surface.

The field home surveys were conducted to identify homes that were built with or near mine waste rock and to characterize the radiation exposure. Written records of homes built of mine rock or other waste materials were not identified prior to field operations. Field sampling efforts therefore relied on the local Chapter Officials to identify any homes for radiation measurements. Home surveys were provided as a service to the Chapters, but were undertaken only when requested and the results are not presented in this Atlas.

A detailed description of the sampling methodology and the analytical program used by the USACE is provided in Appendix A.4b - USACE Field Operations Summary. Appendix A.4c - USACE Data Management Summary provides a description of the data management process used for handling and analyzing the samples.

<table>
<thead>
<tr>
<th>SUMMARY OF ANALYTICAL PROGRAM</th>
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<tr>
<td><strong>STABLE METALS</strong></td>
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<td>Aluminum</td>
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<td>Cadmium</td>
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<td>Iron</td>
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<td>Nickel</td>
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<tr>
<td>Thallium</td>
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<tr>
<td><strong>RADIOACTIVE METALS</strong></td>
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<tr>
<td>Lead$^{210}$</td>
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<tr>
<td>Thorium$^{234}$</td>
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</tbody>
</table>

Calcium, Potassium, Magnesium, Cobalt, and Sodium are secondary analytes (affecting water taste, smell, and color) and are not presented in the Project Atlas data tables.
DEMOBILIZATION

In January 2000, Michael Feeley (Deputy Director of the USEPA Region 9 Superfund Program) initiated demobilization of the field team. The demobilization was based on a request from Derrith Watchman-Moore, Executive Director of the NNEPA, to cease all visits to tribal chapters. The project team began demobilization of all field activities including sampling and communications. The demobilization was completed January 31, 2000. Subsequently all aspects of the project began close-out activities leading to the summarization and distribution of the data collected between 1994 and 2000. These close-out activities included archiving all of the scientific information collected for the project and development of this project Atlas.

WORK COMPLETED

Community Information and Education

From 1994 to 2000, USEPA Region 9 brought the project to approximately 30 chapters on the Navajo Nation. In October 1994 a Blessing Way Ceremony and traditional lunch was held to introduce the project to the first area to be surveyed by helicopter. The helicopter was on hand so people could see it and its crew. As the project progressed, outreach materials in the form of simple flyers and photographs were distributed to the chapter houses and trading posts. Maps were developed from the aerial surveys to show radiation contours, water-sampling results and risk analysis. These maps were provided to, and reviewed with, Chapter Officials. Several presentations on uranium, the mines and the environment were given at schools throughout the Navajo Nation. Presentations with more technical content were given for several science classes to teach the fundamentals of the project and how the water sampling was performed. A coloring book titled "Gamma Goat - The Dangers of Uranium" was created to teach the younger children about uranium mines and radiation.

Aerial Radiation Surveys

Aerial radiological surveys of 41 uranium mining areas (1,144 square miles) within the Navajo Nation were conducted during the period of October 1994 through October 1999. The aerial surveys located hundreds of radiation sources from single mines, clusters of mines and loading areas. The radiation levels measured by the helicopter surveys are shown on two series of maps. The Bismuth$^{214}$ data are indicative of the presence of uranium and, therefore, a good indicator for old mines and mine-related activity. The gross count data are indicative of the total radiation in the area. Identifying current radiation source areas was useful for designing field sampling plans for water and home surveys.

Field Data Sampling

The USACE identified many radiation sources, sampled water used for human consumption, and conducted home surveys. Between June 1998 and January 2000 the USACE field investigations included 227 water samples, 27 Quality Control Samples (of which 14 were field blanks and 13 were duplicates), 28 home surveys, and 34 radiation surveys. The home surveys are not presented in this Atlas.
Characterization of Risk Leading to Exposure Reduction

Focusing on the greatest potential exposures supported the overall project goal of exposure reduction. At the close of the investigations conducted from 1994 to 2000 the evaluation of risk and exposure reduction had been viewed in two ways: 1) identifying current exposures by using aerial and field radiation surveys, performing home construction surveys, and conducting extensive water sampling, and 2) preventing future exposures through education. By locating the greatest exposures across all the major mining areas, these data were made available to begin exposure reduction actions, such as removal of radioactive stone masonry in homes and locating alternative local water sources in areas with elevated metals. Although the project was not completed, the data were made available to all interested parties.

WORK NOT COMPLETED

The following is a description of investigations that were not initiated or not completed prior to demobilization in early 2000.

Data Collection

Work In Progress That Stopped

Chapters With Requests For Assistance and Information - In each area sampled the Chapter Officials were advised that the field team would be returning to complete the field sampling, to assist in locating alternative local water sources in areas where there were elevated metals, and to check for bacteria in good water sources and alternative local water sources. The Chapter Officials had also requested discussions with the project team concerning the maps and results, since understanding the results was vital to assessing alternative sources of water. These activities were not completed before the demobilization.

Chapters With Helicopter Surveys, But No Ground Surveys - There were some areas where helicopter radiation surveys were completed, but no water or home samples were conducted prior to demobilization. An example was the Sanostee area south of Red Valley and Cove. The helicopter radiation survey was completed. Water and home sampling was discussed with Chapter Officials, but no sampling was conducted prior to demobilization.

Chapters With Water Surveys, But Incomplete Radiation Source Characterization - Conversely, there were some areas where water samples were collected, but there was incomplete radiation source characterization. An example of where this occurred was Sweetwater, located adjacent to Teeh Nos Pos at the south end of the Tsetah Wash flight area. Water sampling had begun but was not completed. An area of old mines was identified west of the Tsetah Wash flight area. No aerial or ground surveys were conducted for radiation from this area to the west.
ABANDONED URANIUM MINES PROJECT ATLAS

PROJECT OVERVIEW (continued)

Uranium Mines Abandoned Post-1977 Surface Mining Control and Reclamation Act (SMCRA) - These mines form a category of abandoned mines that are not reclaimed by the NNAMLRD under authority of the SMCRA. The locations and nature of these sites were not determined by the time of demobilization.

Work Planned But Not Started

Eastern Agency South of Red Valley - In August 1999 the Grazing Officials of the Eastern Agency held a regular meeting, that included a discussion of the investigations in chapters with abandoned uranium mines. They were interested in having the radiation investigations come to their chapters including Two Grey Hills, which is adjacent to Sanostee where the helicopter survey was done, and the chapters along I-40 in the Grants Mineral Belt.

Eastern Agency Along I-40 - No helicopter radiation survey, water sampling or home construction sampling was conducted here. It was planned, but not begun at the time of demobilization.

Uranium Mining Areas Not Surveyed By Helicopter - There were historical records of some mines, many of which are presented on the regional map, in areas that were not surveyed by helicopter. In most of these cases, either the sparse distribution or extreme terrain conditions made the area inefficient or unsuitable for aerial measurement of radiation. These additional mining areas would have been surveyed with radiation equipment used at ground level. This would have been done in coordination with local officials familiar with land use in the vicinity of the mines.

Uranium Mining Exploration Activities - In numerous locations, there was evidence of uranium exploration activities in the form of excavations and test holes of various sizes. The exploration was typically performed to detect the presence of a deposit that might lie near a mined accumulation of ore. The presence of these remnants of exploration presents the possibility of degradation of water quality in the area. The area from Chilchinbito to Rough Rock to Many Farms is an example. Further investigation of water quality over a larger area than the immediate vicinity of the mining sites would be necessary to determine the situation.

Characterization of Risk Leading to Exposure Reduction

Aerial Measurements
The radiation levels measured by the helicopter surveys were shown on two series of maps. However, the radiation source areas were not characterized as to the risk posed by each source since the specific proximity to people and land use had not been determined at the time of the project close out.

Field Measurements
The measurements of radiation made by the field team included a gamma radiation reading at each water sample location, various areas of old mining activity such as pits, mine openings and waste piles, and stone masonry used in home construction. The risk posed by these specific external sources of radiation exposure had not been calculated or presented on maps at the time of the project close out. The cumulative risks in each area were not fully determined at the time of the project close out.

Community Information and Education
Follow-up visits were planned for each chapter to discuss in detail the results of the sampling, to explain the health risks involved with the water sources, and to assist with possible solutions. Sampling of additional local water sources used for human consumption was planned if the communities requested after the review of data results.

EXPOSURE REDUCTION

The reduction of exposure to the various hazards created by the abandoned uranium mines was to be addressed through field actions to reduce or eliminate the source(s) of the greatest exposure and through education to prevent future exposures. Field actions to reduce or eliminate these source(s) of exposure were underway beginning with a scouting trip to locations in the Four Corners and Monument Valley areas to assess the logistics for Removal Actions (a method of exposure reduction through the USEPA Superfund Program). No field activities to reduce or eliminate the sources of radiation had been completed when the field operations were demobilized in January 2000. Various forms of education to prevent exposure were underway at the time of project close out.