



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Via E-mail and U.S. Mail

September 29, 2009

Lance Hauer, Remedial Project Manager  
General Electric Corporation  
Corporate Environmental Programs  
640 Freedom Business Center  
King of Prussia, PA 19406

RE: *Northeast Church Rock Mine Site, Interim Removal Action  
Asbestos Abatement Work Plan, Southwest Abatement, Inc., September 15, 2009,  
EPA approval with modifications*

Dear Mr. Hauer:

This letter is in response to the Asbestos Abatement Work Plan received September 15, 2009 for the Northeast Church Rock Mine Site ("NECR Site" or "Site"), Interim Removal Action (IRA), Step-Out Area provided on behalf of respondents United Nuclear and General Electric (collectively "Respondents"). EPA reviewed the Asbestos Abatement Work Plan, addressing tile found in the building pads, provided pursuant to the Administrative Order on Consent (AOC) for the IRA. I am providing EPA's comments on the CP.

In consultation with the Navajo Nation and my team, I am approving the Asbestos Abatement Work Plan with two modifications.

1. **Section 6, last item.** Spelling – lightening.
2. **Section 11, Paragraph 1**

This section states "All individuals proposed as workers will be trained in accordance with the OSHA regulation in 29 CFR 1926.1101." It is START's understanding that, all workers at the NECR site must be trained in Hazardous Waste Operations per the OSHA regulations in 29 CFR 1910.120. This would be in addition to training required for asbestos removal workers.

This acknowledges my approval to proceed with implementation of the Asbestos Abatement Work Plan for the NECR Step-Out Interim Removal Action with the revisions

noted in this correspondence and to continue submitting the documents stipulated in the AOC. Please contact me at (415) 972-3167 with any questions.

Sincerely,

Andrew Bain  
Remedial Project Manager  
EPA Region 9

Cc: Harry L. Allen, EPA (via email)  
Freida White, NNEPA/NSP (via email)  
David A. Taylor, NDOJ (via email)  
Laurie Williams, EPA (via email)



**BILL RICHARDSON**  
Governor

**DIANE DENISH**  
Lieutenant Governor

**New Mexico**  
**ENVIRONMENT DEPARTMENT**

**Air Quality Bureau**  
1301 Siler Road, Building B  
Santa Fe, NM 87507-3113  
Phone (505) 476-4300  
Fax (505) 476-4375  
[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)



**RON CURRY**  
Secretary

**JON GOLDSTEIN**  
Deputy Secretary

**For Official Use Only**

**NMED ONLY:** Approved:  Denied:  AI No. **n/a** Tracking No: **AQBA-77-018**

**Approved**

The Air Quality Bureau staff has reviewed the NESHAP notification submitted for

Facility Description: **Northeast Church Rock Mine Site**  
**10 miles North on I40 on Hwy 566**  
**Gallup, NM 87305**

Start Date:10/1/09

and it has been determined that the minimum requirements as specified within 40 CFR 61.145 have been met. Therefore, the notice is approved. **This Approval Letter must be kept at the worksite and made available for inspection, whether or not asbestos is present.**

For asbestos stripping/removal operations or demolition operations that start after the originally scheduled start date, you must notify the NMED Air Quality Bureau with a revised NESHAP notification that references the above mentioned tracking number prior to the originally scheduled start date.

For asbestos stripping/removal operations or demolition operations that start before the originally scheduled start date, you must provide the Bureau with a revised notice at least 10 working days prior to any asbestos stripping or removal or demolition operation begins.

Approving Official:Chris Rosacker

Date:9/25/09

Title:Environmental Compliance Specialist



Janet Napolitano  
Governor

**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**AIR QUALITY DIVISION - COMPLIANCE SECTION**

1110 West Washington Street - Phoenix, Arizona 85007  
(602) 771-2300 - www.azdeq.gov



Stephen A. Owens  
Director

**ASBESTOS NESHAP WASTE SHIPMENT RECORD**

GENERATOR	1a. Work Site Name, Address & County NORTHEAST CHURCH ROCK MINE SITE STATE HWY 566, GALUP, NM McKinley Cty.		1b. Owner/Generator's Name and Mailing Address UNITED NUCLEAR CORPORATION HIGHWAY 566, PO BOX 3077 GALUP, NM 87301			
	2. Operator's Name & Mailing Address SAME AS 1B		3. Waste Disposal Site (WDS) Name, Address and Physical Location WASTE MANAGEMENT BUTTERFIELD STATION LANDFILL 40404 S. 99TH AVE, MOBILE, AZ 85239			
	4a. Asbestos NESHAP Regulatory Agency Name & Address for Work Site NEW MEXICO ENVIRONMENT DEPARTMENT AIR QUALITY BUREAU 1301 SILVER RD SANTA FE, NM 87507-3113		4b. Asbestos NESHAP Regulatory Agency for WDS: Name & Address MARICOPA COUNTY AIR QUALITY DEPARTMENT 1001 NORTH CENTRAL AVENUE SUITE 400 PHOENIX, AZ 85004			
	5. Description of Materials FLOOR TILE		6. Containers: Number	Containers: Type	7. Total Quantity Removed in m <sup>3</sup> (yd <sup>3</sup> )	
	Friable Asbestos Material RQ, ASBESTOS, 9, NA2212, III		1	roll-off	9.26 yd <sup>3</sup>	
	Nonfriable Asbestos Material		NA	NA	NA	
	8a. Special Transportation, Treatment, Storage or Disposal Information double-bagged in 6 mil poly prior to placement in roll-off container					
	8b. Bill of Lading Information Waste Management # WM 40740					
	8c. Alternate Waste Disposal Site Information NA					
	8d. Emergency Response Telephone No. 505-905-6651					
9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations. NOTE: The Waste Operator must retain a copy of this form.						
PRINTED/TYPED Name & Title Max Chischilly, Radiation Safety Officer (RSO)		Signature <i>Max Chischilly</i>		MO DAY YR 10-12-09		
TRANSPORTER	10. Transporter 1 ( Acknowledgement of Receipt of Materials)		Signature		MO DAY YR	
	PRINTED/TYPED Name & Title		Signature		MO DAY YR	
	11. Transporter 2 ( Acknowledgement of Receipt of Materials)		Signature		MO DAY YR	
DISPOSAL SITE	12. Discrepancy Indication Space		Signature		MO DAY YR	
	13. Waste Disposal site Owner or Operator of receipt of Asbestos materials covered by this manifest except as noted in item 12		Signature		MO DAY YR	



WASTE MANAGEMENT, INC.

ONE MANIFEST PER LOAD, CALL FACILITY 24 HOURS IN ADVANCE TO SCHEDULE AND CONFIRM.

WM 40740

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION - COMPLIANCE SECTION

3033 North Central Avenue - Phoenix, Arizona 85012

1110 W. Washington St Phoenix, AZ 85007

ASBESTOS NESHAP WASTE SHIPMENT RECORD

GENERATOR	1a. Work Site Name: Address & County Northeast Church Rock Mine Site State Highway 566, Gallup, NM McKinley County		1b. Owner/Generator's Name and Mailing Address United Nuclear Corporation Highway 566, P.O. Box 3077 Gallup, NM 87301 Owner's Telephone No 505-905-6651			
	2. Operator's Name & Mailing Address  SAME AS 1b  Operator's Telephone No.		3. Waste Disposal Site (WDS) Name, Address and Physical Location Butterfield Station Landfill 40404 S 99th Ave Mobile AZ 85139 602-256-0630			
	4a. Asbestos NESHAP Regulatory Agency Name & Address for Work Site New Mexico Environment Department Air Quality Bureau 1301 Siler Rd Santa Fe, NM 87507-3113		4b. Asbestos NESHAP Regulatory Agency for WDS: Name & Address Maricopa County Air Quality Department 1001 North Central Avenue, Suite 400 Phoenix, AZ 85004			
	5. Description of Materials Floor file	6. Containers: Number	Containers: Type	7. Total Quantity Removed in m <sup>3</sup> (yd <sup>3</sup> )		
Friable Asbestos Material	1	Roll-off	9.26 yd <sup>3</sup>			
Nonfriable Asbestos Material	NA	NA	NA			
8a. Special Transportation, Treatment, Storage or Disposal Information		PROFILE APPROVAL NO. BFS 10/336AE				
8b. Bill of Lading Information		NORTH AMERICAN EMERGENCY RESPONSE GUIDE 171, OR NAERG 171				
8c. Alternate Waste Disposal Site Information		NA				
8d. Emergency Response Telephone No.		505-905-6651				
9. OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.						
NOTE: the waste Operator must retain a copy of this form.						
Printed/Typed Name & Title Max Chischilly, Radiation Safety Officer (RSO)		Signature Max Chischilly	MO 10	DAY 12	YR 09	
TRANSPORTER	10. Transporter 1 (Acknowledgement of Receipt of Materials) MP Environmental 3045 S 51st Ave Phoenix AZ Printed/Typed Name & Title, Address & Telephone No 602-278-6233		Signature M. P. [unclear]	MO 10	DAY 2	YR 09
	11. Transporter 2 (Acknowledgement of Receipt of Materials)  Printed/Typed Name & Title, Address & Telephone No		Signature	MO	DAY	YR
DISPOSAL SITE	12. Discrepancy Indication Space					
	13. Waste Disposal site Owner or Operator of receipt of Asbestos materials covered by this manifest except as noted in Item 12  Printed/Typed Name & Title		Signature	MO	DAY	YR

OPERATOR: RETAIN THIS COPY WITH TRANSPORTER 1 SIGNATURE (ITEM 10)