

Comments on Northeast Church Rock Engineering Evaluation and Cost Analysis (EE/CA)  
at Public Hearing July 7, 2009

From: Bluewater Valley Downstream Alliance

To: United States Environmental Protection Agency, Region IX  
75 Hawthorne Street, San Francisco, CA 94105

The Bluewater Valley Downstream Alliance hereby submits the following comments to the USEPA, Region IX regarding the Northeast Church Rock uranium mine site owned by United Nuclear/General Electric.

- The USEPA should work diligently over the next few months with knowledgeable community members to explain the mine and mill sites to the surrounding communities and explain proposed alternatives to both the mine and mill before an alternative is chosen.
- An immediate, detailed characterization of groundwater at the uranium mill tailings site must be conducted and explained to the community, so that options for both mill and mine remediation can be considered simultaneously. Splitting the two sites and working on each separately makes no sense and bad decisions may result.
- There should be an extension of the comment period until the above two conditions can be met.
- Under CERCLA guidance (20, 43), community acceptance is an important criterion for analyzing cleanup alternatives. In this case, the larger community may not be well informed nor has the mill tailings site been studied adequately in order for anyone to make an informed decision. This is unacceptable.
- Allowing the community to suffer this long, and exposing community members to possible health effects is immoral and should be illegal. Therefore, the USEPA must act quickly to force UNC/GE to pay for the characterization of groundwater at the mill tailings site. USEPA must see to it that this work is carried out with proper quality assurance and controls and must act quickly to educate the entire community, not just nearby residents of the results.
- If the community wants the waste removed, it should be removed. The physical and mental health of community members has been adversely affected by both the mine and mill site. They have suffered enough and the solution they choose should be respected. This is the VERY LEAST the government and this company owes the community.
- Cost to the company should not be included in the EPA's criteria. GE, which is the corporation that should pay for this cleanup, announced first-quarter 2009 earnings from continuing operations (attributable to GE) of \$2.8 billion. Since 2000, GE has invested approximately \$50 billion in product technology, but little to cleaning this environmental disaster. Costs for cleanup at this site will be substantial, but so was the

damage done to this community, including health effects that may be passed to future generations, perhaps forever.

- When the waste is removed, community members should be hired and trained to oversee the project since they are justified in their mistrust of UNC/GE.
- Until these goals are achieved, community members should be at the table for every meeting between UNC/GE and USEPA and they should be afforded legal counsel commensurate with that afforded by UNC/GE and USEPA.
- The entire area must be returned to pre-mining conditions and residents compensated for the degradation to their health and environment caused by UNC/GE's money-making enterprise and the lack of oversight by regulatory agencies.

Based on your answers,

① We do not believe  
the <sup>warrant</sup> findings are dry  
now.

This will add  
weight to wet facts.

② We question the cover - do  
not believe adequate  
would needs ongoing air radon monitoring  
into perpetuity