

January 3, 2020

Ron Linton
Uranium Recovery & Materials
NRC
11545 Rockville Pike
Rockville, MD 20852



Dear Mr Linton:

The United States Environmental Protection Agency (EPA) will soon issue a Record of Decision (ROD) on groundwater remediation at the Homestake Mining-Barrick Gold uranium mill tailings Superfund site, north of Milan, New Mexico. EPA will choose whether to bow to corporate interests and accept flawed scientific interpretations, a course that would simplify regulatory procedures for the EPA, the United States Nuclear Regulatory Commission (NRC), and the New Mexico Environment Department (NMED), or to accept a more technically sound analysis of background water quality at the site by nationally recognized experts contracted by the Bluewater Valley Downstream Alliance, a core member of the Multicultural Alliance for a Safe Environment (MASE) – two community groups whose only interest is to protect the lives of people who will be most affected by this decision, many of whom have now endured the contamination from this site for over forty years.

We write to EPA because they will make the ultimate decision on background groundwater quality and the appropriate remedy for this site. We write to the NRC because they have additional power to assure that Homestake Mining-Barrick Gold prepares a groundwater remediation plan that will finally clean the contaminated aquifers at this site to background levels, after so many experimental and failed attempts. We write to NMED because this is the agency that should be most concerned with helping our small New Mexico community restore and protect the groundwater resources that are so essential to the future of all residents in the San Mateo Creek and Bluewater Basins of northwestern New Mexico.

Finally, we write to our Congressional Delegation, because only you—our duly elected representatives—have the clout to weigh in with these regulatory agencies. If we, the people, had any power, this remediation effort would have been effective long before now. Please, do not let us down. The time is right. The evidence is on our side. The people most affected, our neighboring communities, and our environmental allies are all counting on your support.

Using Homestake Mining-Barrick Gold's groundwater quality data, BVDA/MASE consultants have re-evaluated background water quality for uranium and selenium in all affected aquifers at the Superfund Site. Their conclusion is that the current Groundwater Protection Standards (GWPS) are skewed by certain samples that were clearly impacted by past mining and milling activity. As a result, the current GWPS values do not reflect true background conditions in the affected aquifers. When those samples are removed, background uranium and selenium values are substantially lower. Our consultants have

re-evaluated the two most important contaminants of concern (COCs) for the site. We would like to see a similar evaluation conducted for the remaining COCs.

We submit two attached memoranda, and our technical experts stand by to further assist EPA and NMED if their help is needed to evaluate the remaining COCs.

Because the Homestake Mining-Barrick Gold's revised Groundwater Corrective Action Plan (GCAP) must be submitted to the NRC by December 19, 2019, it is imperative that the EPA act on this information so that the NRC and Homestake Mining-Barrick Gold can adopt and incorporate this new understanding of background values into the GCAP for the Homestake Mining-Barrick Gold Superfund site.

We look forward to replies from each of you.

Sincerely,

A handwritten signature in black ink that reads "Susan R. Gordon". The signature is fluid and cursive, with the first name "Susan" being larger and more prominent than the last name "Gordon".

Susan Gordon, Coordinator, Multicultural Alliance for a Safe Environment

Candace Head-Dylla, Bluewater Valley Downstream Alliance

Laura Watchempino, Multicultural Alliance for a Safe Environment

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