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**ENGINEERING EVALUATION/COST ANALYSIS  
FMPC SOUTH PLUME**

**06/15/90**

**RUETGERS-NEASE/DOE-FMPC**

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**LETTER**

**OU5**

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# Ruetgers-Nease

Chemical Company, Inc. • A subsidiary of Rütgerswerke AG



June 15, 1990

201 Struble Road  
State College  
Pennsylvania 16801

Phone: 814-238-2424  
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Mr. Gerald W. Westerbeck *GW*  
Site Manager  
U.S. Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

Re: Engineering Evaluation/Cost Analysis FMPC South Plume

Dear Mr. Westerbeck:

Ruetgers-Nease Chemical Company, Inc. has reviewed the "Engineering Evaluation/Cost Analysis South Plume" report dated April 1990 for the Feed Materials Production Center in Fernald, Ohio. In addition to comments submitted jointly under separate cover by the parties involved in the Paddys Run Road Project, Ruetgers-Nease additionally has the following comments:

1. U.S.DOE has proposed institutional controls to prevent the installation of new groundwater wells within the South Plume area. Since Ruetgers-Nease operates a manufacturing plant located within this area, we are concerned about the impact of such institutional controls on our ability to install new groundwater pumping wells to supply our site. Such restrictions could severely limit our ability to provide adequate water supply for our manufacturing operations in the future.
2. As part of the removal action proposed in the EE/CA, U.S.DOE has proposed to install an alternate water supply for two industrial facilities located to the north of the Ruetgers-Nease site. With one of the manufacturing facilities withdrawing substantial quantities of water from existing groundwater wells, it has been suggested on a number of occasions that these wells may have in the past acted as a barrier to prevent the migration of the FMPC groundwater contaminant plume south toward our facility. With a proposed alternate water supply for this facility and the possible shutdown of the existing groundwater wells, Ruetgers-Nease is very concerned that the groundwater contaminant plume from the FMPC will rapidly migrate to the Ruetgers-Nease groundwater well and prevent its future use within our operations. Based on existing piezometric data, groundwater flows in a south/ southeasterly direction, and therefore it is very likely that contaminants in the wells located north of the Ruetgers-Nease



property will migrate south to the Ruetgers-Nease well.

3. U.S.DOE has also proposed the installation of a series of groundwater recovery wells to prevent the further spread of the contaminant plume from the FMPC. While we support the overall groundwater recovery concept, we do have some concerns about the proposed groundwater recovery system. Depending on the precise location of the groundwater recovery wells proposed in the EE/CA, the FMPC contaminant plume will actually be pulled more rapidly to the south to the location of the recovery wells. Since the Ruetgers-Nease facility and several other properties also along New Haven Road are located north of the proposed location of these recovery wells, the proposed removal action will make it very likely that contaminants will make their way to these private wells.

In addition, with the high rate of pumping proposed in the recovery system (approximately 2000 gpm), Ruetgers-Nease would like to know if U.S.DOE considered the possibility that Paddys Run may become a discharge zone as a result of the depression of the groundwater table. The impact of this would be that any potential contaminants located in the water/sediments in Paddys Run may be drawn toward the recovery wells. As a result, wells located along New Haven Road including the Ruetgers-Nease well, could possibly become a receptor for contaminants associated with the FMPC operation that are located in Paddys Run.

#### RECOMMENDATION

With the above facts in mind, Ruetgers-Nease believes that U.S.DOE should extend the alternate water supply to Ruetgers-Nease (and others within the South Plume area who may face the same fate as a result of the planned removal action) to ensure that the facility is provided with a water supply which is free of contaminants (e.g. uranium) from the FMPC. The proposed removal action is based on a groundwater model which at best is a crude approximation of what may happen after the removal action is implemented. Since this model is based on a number of assumptions, we believe that U.S.DOE must ensure that all properties within the South Plume area which have the potential to be adversely impacted by groundwater contaminants from FMPC are provided with a water supply which is free of contaminants.

Ruetgers-Nease appreciates the opportunity to provide these comments on the EE/CA for the FMPC South Plume. Since we believe that these comments represent significant issues of interest to both Ruetgers-Nease and other property owners, we request that U.S.DOE prepare a detailed response to these comments. Additionally, Ruetgers-Nease would be willing to further discuss these issues at a mutually convenient time.



Sincerely,

*Steven W. Foard*

Steven W. Foard, P.E.  
Manager Environmental Services

cc: N. Cope- Ruetgers-Nease  
H. Greenberg- Ruetgers-Nease