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**INSTALLATION OF MONITORING WELL ON
SOUTHWESTERN OHIO WATER COMPANY
(SOWC) PROPERTY**

09/15/88

**DOE-1398-88
DOE-FN/USEPA
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LETTER**



Department of Energy

Oak Ridge Operations
P. O. Box E
Oak Ridge, Tennessee 37831

APC

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September 15, 1988

DOE-1398-88

Ms. Catherine McCord
U. S. Environmental Protection Agency
Region V
230 South Dearborn St.
Chicago, Illinois 60604

Dear Ms. McCord:

INSTALLATION OF MONITORING WELL ON SOUTHWESTERN OHIO WATER COMPANY (SOWC) PROPERTY

Your request for DOE to access the SOWC property under the authority provided in Section 104(e) of SARA is not substantiated at this time by the available data. Per Section 104(e), the authority to enter the property may be exercised only if there is a reasonable basis to believe there may be a release or threat of release of a hazardous substance, pollutant, or contaminant. Wells upgradient of the originally proposed SOWC well location (well 371) have shown no detectable uranium at the 200-series level, and only slight uranium concentrations (2-3 mg/l) in the corresponding 300-series wells. Recent groundwater modeling studies for purposes of the investigation of the FMPC discharge to the Great Miami River confirm that these wells are directly upgradient of the 371 location. Ongoing monitoring at the SOWC collector wells provides additional data that indicate conditions do not warrant access under Section 104(e).

The original proposal to locate additional wells on SOWC property was based on the level of understanding and data available at time of the RI/FS Work Plan preparation. It is our contention that the progressive findings of the Remedial Investigation can now be used to justify the deletion of this location. Such changes to the scope of work based on interim findings are consistent with the program allowances provided for under CERCLA. In particular, Round 1 groundwater quality data indicates that no contamination is present in the regional aquifer in areas immediately upgradient from the proposed location. The existing monitoring points are closer to the perceived sources at the FMPC, and thereby provide a monitoring network that eliminates the need for additional deep wells on the SOWC property. The preliminary model results confirm that the existing wells lie within the flow path between FMPC sources and existing wells 271.

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In summary the DOE Position is that the current RI/FS groundwater monitoring network and results of sampling to date preclude the need for additional wells on SWOC property.

Sincerely,


James A. Reafsnyder
Site Manager

DP-84:Stone

cc:

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