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**WELL COMPETENCY INVESTIGATION**

07/17/92

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LETTER



**Department of Energy**  
**Fernald Environmental Management Project**  
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**JUL 17 1992**

DOE-2121-92

Mr. Graham Mitchell  
 Mr. Phil Harris  
 Ohio Environmental Protection Agency  
 40 South Main Street  
 Dayton, Ohio 45402

Dear Mr. Mitchell and Mr. Harris:

**WELL COMPETENCY INVESTIGATION**

On May 15, 1992, the Fernald Environmental Management Project (FEMP) conducted a down-hole camera inspection on the monitoring wells near Waste Pit 4. The FEMP has been investigating the integrity of all wells constructed with PVC riser material. The wells surveyed on this date were numbers 1019, 2019, 3019, 1021, 2021, 1022, 2022. Construction information on these wells is as follows:

| WELL NUMBER | TOTAL DEPTH | RISER MATERIAL | DIAMETER | INSTALLATION DATE |
|-------------|-------------|----------------|----------|-------------------|
| 1019        | 10 FEET     | PVC            | 4 INCH   | FEB. 1985         |
| 2019        | 72 FEET     | PVC            | 4 INCH   | FEB. 1985         |
| 3019        | 123 FEET    | PVC            | 4 INCH   | FEB. 1985         |
| 1021        | 10 FEET     | PVC            | 4 INCH   | FEB. 1985         |
| 2021        | 72 FEET     | PVC            | 4 INCH   | FEB. 1985         |
| 1022        | 11 FEET     | PVC            | 4 INCH   | FEB. 1985         |
| 2022        | 83 FEET     | PVC            | 4 INCH   | FEB. 1985         |

Water was observed seeping into the casings of the 2000 and 3000 series wells at several joints between lengths of riser pipe. The FEMP plans to plug and abandon these wells as per Ohio Administrative Code (OAC) 3745-65-09.

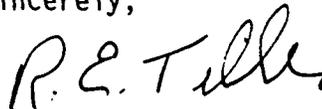
Monitoring wells 2019, 2021, and 3019 are currently sampled as part of the Resource Conservation and Recovery Act (RCRA) Groundwater Quality Assessment

Program (GQAP). The FEMP had planned on replacing wells 2019 and 3019 with new monitoring wells constructed of stainless steel as part of the RCRA Groundwater Monitoring Plan (GMP) proposed to the Ohio EPA and U. S. EPA on December 20, 1991. The FEMP has accelerated the schedule for the replacement of wells 2019 and 3019. The work should be completed by October, 1992. The new RCRA GMP proposed a monitoring system along the perimeter of the Waste Pit Area that does not include the monitoring of well 2021. The FEMP, therefore, plans to plug and abandon the well without replacement. The deletion of well 2021 from the monitoring program constitutes a modification of the GQAP; however, replacement is not necessary if the proposed RCRA GMP is acceptable.

The GMP was proposed to attain compliance with the continual monitoring requirements of RCRA without duplication of the site characterization activities of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) program. The FEMP will assimilate all agency recommendations regarding this plan to achieve a compliant groundwater monitoring program.

If you or your staff have any questions, please call Ed Skintik at FTS/Commercial (513) 738-6660.

Sincerely,



R. E. Tiller  
Manager

FN:Skintik

cc:

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