environmental
properties management, LLC

April 16, 2019

Mr. Ken Kalman
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Mr. Paul Davis
Oklahoma Department of Environmental Quality
707 North Robinson
Oklahoma City, OK 73101

Mr. Robert Evans
U.S. Nuclear Regulatory Commission
1600 East Lamar Blvd; Suite 400
Arlington, TX 76011-4511

Re: Docket No. 70-925; License No. SNM-928
Groundwater and Soil Characterization and Well Abandonment Scope of Work

Dear Sirs:

Solely as Trustee for the Cimarron Environmental Response Trust (CERT), Environmental Properties Management LLC (EPM) and representatives of the Oklahoma Department of Environmental Quality (DEQ) attended meetings conducted at the Nuclear Regulatory Commission (NRC) offices in Rockville, MD, on April 4th and 5th, 2019. During those meetings, we discussed the implementation of one particular aspect of the scope of work contained in the proposed budget for 2019.

A portion of the scope of work in the proposed budget for 2019, listed under Task 4, Site Decommissioning, includes:

1. Clearing access paths and constructing a "road" to provide access for vertical profiling and well installation.
2. Advancing a hydraulic profile tool using direct push technology to assess permeability and the vertical distribution of uranium and/or nitrate at locations where groundwater extraction wells will be installed in alluvial material.
3. Collecting aquifer soil samples at select extraction well locations using direct push technology to assess the grain size distribution (GSD) of the soil for extraction well screen slot size design and filter pack gradation selection.
4. Abandoning monitor wells which are no longer useful for characterization, in-process monitoring of groundwater remediation, or post-remediation monitoring.
5. Installing groundwater extraction wells and monitor wells identified in *Facility Decommissioning Plan – Rev 1*.

During our meeting, NRC and DEQ personnel indicated that no decommissioning activities should be performed prior to agency approval of *Facility Decommissioning Plan – Rev 1* (D-Plan). Only activities related to characterization, which may be beneficial in advancing the 60% design to 90% status (to support bidding and construction contracting) can be authorized prior to approval of the D-Plan.

Installation of groundwater extraction and injection wells and monitoring wells that will be used for in-process and post-remediation monitoring can therefore not be performed prior to approval of the D-Plan. However, items 1 through 4 in the above list all constitute characterization activities; in the case of clearing, grubbing, and road-building, these are necessary to provide site access for the stated characterization activities. Consequently, EPM submits herein a proposed scope of work for these characterization activities.

Clearing and Road Construction

The 60% design incorporated into the D-Plan includes provision for the installation of trenches for piping, utilities, and instrumentation in two areas which are currently wooded and/or subject to persistently wet ground conditions:

- A line running from the northeastern corner of Uranium Pond #1 (UP1) to the Cimarron River floodplain.
- A line running along the bluff separating the upland area from the Cimarron River floodplain, from the proposed location of Extraction Well GE-WAA-08 to the proposed location of Extraction Well GE-WAA-13.

Line from Uranium Pond #1 to the Cimarron River Floodplain

The location of the proposed utility corridor running from a point northeast of UP1 to the Cimarron River floodplain is shown in Attachment 1 – Drawing BMCD-GWREMED-C002, which was included in Appendix J-2 of the D-Plan.

Approximately 200 feet of this corridor is heavily wooded and slopes steeply toward the floodplain on the west side of the drainage that forms the eastern edge of the UP1 area. Burns & McDonnell personnel identified this potential utility corridor during a constructability site visit and surveyed the line using Global Positioning System (GPS) equipment to locate what appeared to be a favorable route.

Prior to conducting the utility corridor clearing and investigation activities described below, personnel will use a sub-meter GPS unit to identify and stake the centerline of the corridor, as specified in Attachment 1. Stakes will be placed every 30 feet and field measurements will be

made to confirm the centerline of the corridor is at least 50 feet west of the slope break along the western bank of the drainage running parallel to the corridor. Adjustments to the centerline, if necessary, will be surveyed in the field using the GPS unit and the centerline will be re-staked accordingly.

Prior to clearing trees and brush from the utility corridor, a 48-inch soil probe will be advanced at approximately five evenly-spaced locations along the 200-foot wooded portion of the route to confirm adequate soil overburden thickness exists for the installation of buried utilities.

Assuming sufficient overburden thickness is present, brush and trees will be cleared to create a 50-foot "right-of-way" centered along the proposed utility corridor. This right-of-way will provide the access needed to complete a soil-probing investigation to more precisely define utility trench locations. Information including soil thickness, topographic slope, and proximity to the western drainage bank will be documented during the soil-probing effort; this data may result in minor adjustments to utility trench locations. The 50-foot right-of-way will also be wide enough for construction equipment to stage material and excavate and backfill utility trenches.

After clearing the proposed route, the 48-inch soil probe will be advanced at 30-foot intervals along the centerline of the 200-foot path. The thickness of soil will be recorded at each location. From the soil probes located along the centerline, the soil thickness will also be measured and recorded at 15-foot intervals in both directions, perpendicular to the centerline. If there are locations where the difference between two depth measurements is significant, an additional measurement may be made at the midpoint between those locations. The location of each soil probe will be surveyed in the field using the GPS unit.

A level will be used to measure the elevation difference between each point along the centerline and the points located 15 feet from both sides of each centerline location. This information, in conjunction with the soil thickness data, will be used to evaluate the best route to specify in the 90% design.

Line Along WAA-BLUFF Extraction Wells

The aerial image in Attachment 1 shows heavy vegetation along the line of Extraction Wells GE-WAA-08 through GE-WAA-13. Trees and brush must be cleared from the areas surrounding each of these well locations to provide equipment access for the advancement of characterization borings.

Because these areas, as well as areas adjacent to the proposed locations of Extraction Wells GE-WAA-03, GE-WAA-06, and GE-WAA-07, are topographically low relative to the surrounding floodplain, they are often saturated and difficult to access. Even 4-wheel drive vehicles periodically sink into the soft, saturated sandy soils found present in these areas. In addition to clearing the trees and brush from the wooded areas surrounding GE-WAA-08 through GE-WAA-13, a "road" will be constructed along a line approximately 50 feet north of the proposed GE-WAA-03 through GE-WAA-13 locations. This line is relatively clear and slightly higher in elevation, and thus drier, than the wooded area along the Sandstone A bluff that bounds the Cimarron River floodplain. The topsoil will be removed from this path, and a road base consisting of a geotextile fabric covered with a gravel base and gravel roadbed will be constructed.

The road will extend to the northwest of proposed Extraction Well GE-WAA-03 and will then curve to the south to connect with the existing road that leads from the upland area to the floodplain. This road will not only provide access for the advancing of characterization borings; it will provide year-round access (except during flooding conditions) to the extraction and monitor wells that will eventually be located in this area.

Vertical Profiling

The D-Plan specifies that the screened interval for all extraction wells must encompass the saturated interval in which the concentration of uranium exceeds the DEQ Criterion of 30 micrograms per liter (µg/L). The intake of the submersible pump installed in each extraction well will be set at the depth where the uranium concentration is highest to minimize the extraction of clean water and maximize the extraction of contaminants. This applies to all the extraction wells in both the western areas and in Burial Area #1. Where uranium groundwater concentrations are low, and nitrate is the primary contaminant of concern (e.g., Extraction Wells GE-WAA-06 through GE-WAA-13), the same screen interval and pump depth protocols will used to maximize the extraction of nitrate and minimize the extraction of clean water. Figures 3-1 and 3-3 from the D-Plan, illustrating the magnitude and extent of nitrate and uranium exceeding DEQ Criteria in the western areas, respectively, are included as Attachment 2.

A direct-push rig equipped with a hydraulic profile tool (HPT) will be used to generate a hydraulic conductivity profile and collect depth-discrete groundwater samples within the saturated alluvium at each proposed extraction well location. The direct-push rig will be used to advance the HPT to the base of the alluvial material. The HPT will identify the top of the saturated interval, and the drill string will be advanced to the base of the alluvial material.

Groundwater samples will be collected through a port in the HPT at one foot below the detection of groundwater, and at two-foot intervals thereafter. A groundwater sample will also be collected at the base of the alluvial material. Groundwater samples will be analyzed for uranium and/or nitrate.

Existing Monitor Wells T-54, T-55, T-57, T-58, and T-62 are installed at approximately the same distance from the Sandstone A bluff as the proposed locations for Extraction Wells GE-WAA-06 through GE-WAA-13 (see Attachment 2). Lithologic logs for Monitor Wells T-54, T-55, T-57, T-58, and T-62 show that the permeable alluvial material varies from 16 to 20 feet in thickness (above the bedrock base of the alluvium) at these locations. Based on an average depth to groundwater of 5 to 6 feet in this area, it is believed that the total thickness of the alluvium at each extraction well location must be at least 16 feet to provide adequate water column for pump installation and water table drawdown.

Prior to conducting the vertical profiling borings described above, the direct-push rig will advance a "blind" boring at each proposed extraction well location to confirm at least 16 feet of alluvium is present above bedrock. If this minimum thickness of alluvial material is confirmed, the vertical profiling boring will be advanced adjacent to the blind boring at the proposed location. If the saturated thickness of alluvial material is less than 16 feet, an additional blind boring will be completed an appropriate distance to the north-northwest of the original location. This process will be repeated until a location with at least 16 feet of alluvium is identified, at which point the vertical profiling boring will be advanced adjacent to the last blind boring. The location at which the vertical profiling boring is completed will become the new proposed extraction well location.

Total depth, relative hydraulic permeability values, and uranium and/or nitrate concentration data will be used to specify the precise location, screened interval, and depth of the intake of the submersible pump for each extraction well. All direct-push boring locations will be surveyed in the field using the GPS unit and each boring will be plugged and abandoned in accordance with established procedures.

Grain Size Distribution Sampling and Analysis

Direct-push borings will also be advanced at the following proposed extraction well locations for the collection of aquifer soil samples for GSD analysis:

- GE-WAA-01
- GE-WAA-05
- GE-WAA-06

- GE-WAA-09
- GE-WAA-12
- GE-WAA-15
- GE-BA1-02
- GE-BA1-05
- GE-BA1-09

Results of the GSD analyses will be used to confirm and/or modify extraction well screen slot size and filter pack gradation. Extraction wells will be designed to minimize the production of suspended solids during groundwater extraction. All direct-push boring locations will be surveyed in the field using the GPS unit and each boring will be plugged and abandoned in accordance with established procedures.

Monitor Well Abandonment

Over 290 monitor wells have been installed at the Cimarron site; currently, 240 monitor wells are still present at the site. These monitor wells were installed to assess the presence and/or concentration of contaminants of concern (COCs). Most of the monitor wells still present at the site will continue to be useful for in-process groundwater remediation monitoring and/or for determining the extent of contamination and the configuration of contaminant plumes.

However, 27 monitor wells no longer serve a useful purpose. Sixteen of these wells are located in the Process Building Area, which is a portion of the property now owned by Cimarron Holdings LLC (Cimarron Holdings), now used to conduct manufacturing for the aerospace industry. Groundwater remediation is required in Sandstone B in one small portion of Cimarron Holdings' property. Monitor wells not related to that area should be abandoned and removed from Cimarron Holdings' property.

Eleven monitor wells are located in areas for which groundwater remediation is not required, and COC concentrations have never exceeded NRC criteria. In most of them, COC concentrations have never exceeded State criteria. These monitor wells serve no future purpose and only represent obstructions that can be damaged and require expensive replacement.

EPM proposes to abandon all of the monitor wells that were identified as appropriate for abandonment in the D-Plan. Attachment 3 is Table 9-1 from the D-Plan. This table identifies the area in which monitor wells slated for abandonment are located, the formation in which the monitor wells are screened, and the rationale used in determining that these wells no longer serve a useful purpose.

Conclusion

EPM requests NRC and DEQ approval to proceed with the scope of work described herein. Funding for this work is already included in the proposed budget for 2019. Upon approval of the proposed budget and this scope of work, EPM will authorize Burns & McDonnell to contract for the performance of this work.

If you have questions or desire clarification, please call me a (405) 642-5152 or e-mail me at jlux@envpm.com. Thanks.

Sincerely,

Jeff Lux, P.E.
Project Manager

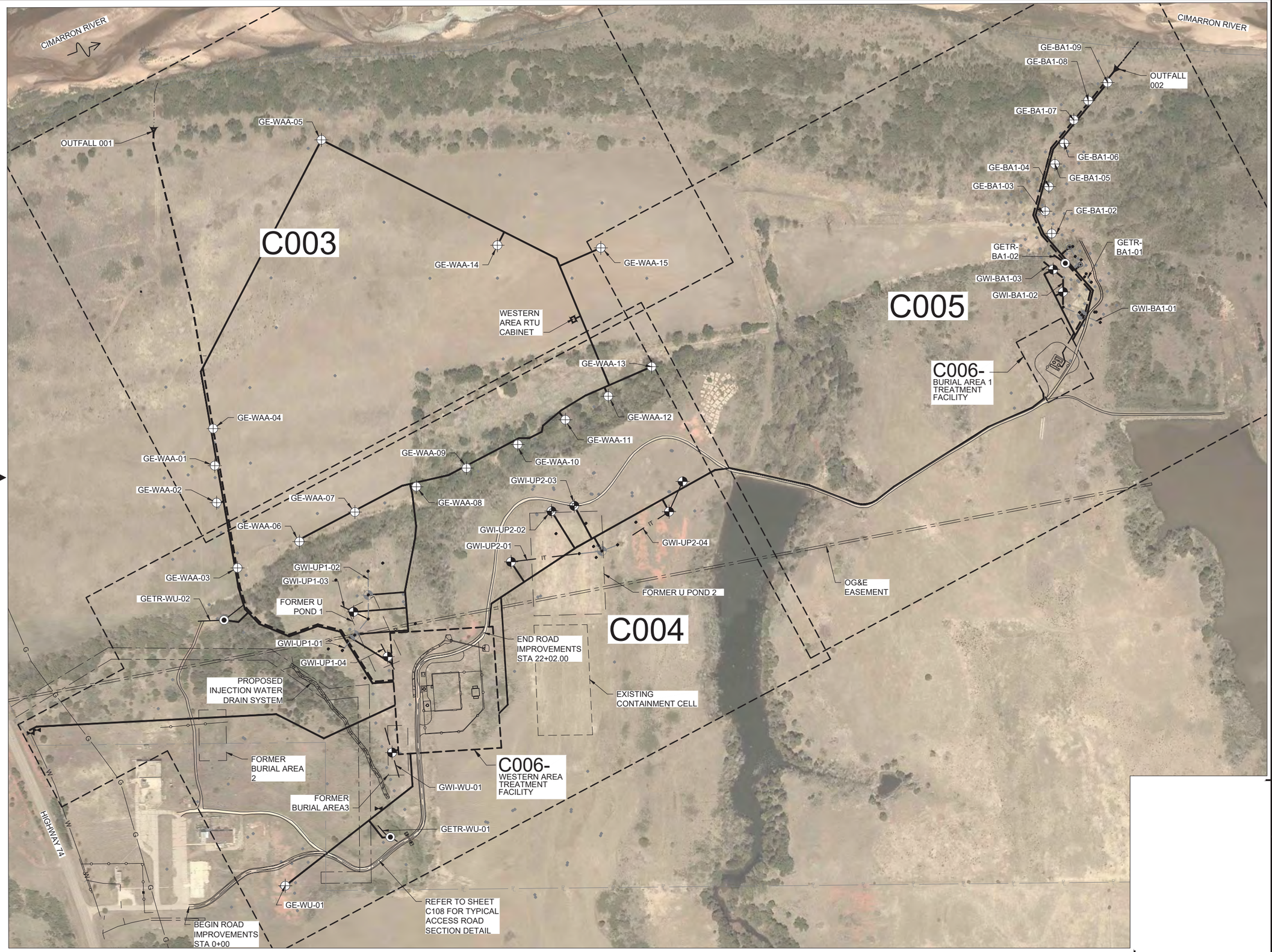
Attachments

cc: US Nuclear Regulatory Commission Public Document Room (electronic copy only)
John Hesemann, Burns & McDonnell Engineering Company (electronic copy only)

environmental
properties management, LLC

Mr. Ken Kalman
U.S. Nuclear Regulatory Commission
April 16, 2019

ATTACHMENT 1
DRAWING BMCD-GWREMED-C002
FROM APPENDIX J-2 OF *FACILITY DECOMMISSIONING PLAN – REV 1*



no.	date	by	ckd	description
A	8/10/18	BCW	RTB	FOR REVIEW

NOTES:

1. AERIAL FEATURES SHOWN ARE FROM AN AERIAL SURVEY DATED MAY 2014.
2. PIPE & CONDUIT ALIGNMENT SHOWN REPRESENTS THE CENTERLINE OF TRENCH WHICH MAY CONTAIN WATER SUPPLY PIPES, GROUNDWATER INJECTION SUPPLY PIPES, GAS PIPES, COMPRESSED AIR HOSE, GROUNDWATER EXTRACTION PIPES, DISCHARGE PIPING, ELECTRICAL POWER SUPPLY CABLE CONDUITS, FIBER OPTIC CONDUITS, AND COMMUNICATION CABLE CONDUITS, AS DETAILED. SEE SHEETS C003, C004, AND C005 FOR INDIVIDUAL PIPE AND CABLE RUNS.

NORTH

0 200' 400'
SCALE IN FEET

PRELIMINARY - NOT FOR CONSTRUCTION

BURNS McDONNELL
9400 WARD PARKWAY
KANSAS CITY, MO 64114
816-333-9400
OKLAHOMA FIRM LICENSEE NO. 421

date	detailed
AUGUST 2018	B. WEIS
designed	checked
B. WEIS	R. BETTMENG

Cimarron Environmental Response Trust
OVERALL SITE PLAN AND SHEET LAYOUT KEY

project	contract
104407	-

drawing **BMCD-GWREMED-C002** rev. **A**

sheet 2 of 14 sheets
file C002_ OVERALL SITE PLAN.DWG

Scale For Microfilming
Millimeters
Inches
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Mr. Ken Kalman
U.S. Nuclear Regulatory Commission
April 16, 2019

ATTACHMENT 2
FIGURES 3-1 and 3-3 FROM *FACILITY DECOMMISSIONING PLAN – REV 1*

LOCATION	NITRATE
1343	6.45
1311	21.6
1312	380
1313	240
1319A-2	31.9
1319B-1	57.4
1319B-2	2.68
1319B-3	75.8
1319B-4	3.70
1319B-5	11.3
1320	18.6
1322	19.4
1324	3.76
1325	19.7
1326	27.1
1327B	36.4
1329	31.4
1330	13.1
1331	10.1
1333	4.19
1334	5.83
1335A	2.50
1336A	377
1337	53.3
1338	7.01
1340	53.8
1341	28.6
1345	7.66
1346	407
1347	65.0
1348	11.6
1349	20.2
1350	11.7
1351	76.1
1352	55.0
1353	7.75
1354	142
1355	14.0
1356	14.8
1357	52.0
1358	16.9
1359	21.7
1360	13.4
1375	34.3
1376	17.0
1377	8.73
1378	8.55
1379	7.37
1380	17.1
1381	839
1382	2.44
1383	227
1384	0.400
1385	1006
1386	15.4
1387	60.2
1388	9.15
1389	21.7
1390	4.89
1391	4.09
1392	1.11
1393	275
1394	4.25

LOCATION	NITRATE
1395	1.60
1396	17.5
1397	202
1398	0.748
1399	69.5
1400	104
1401	802
1402	217
1403	5.83
MWWA-03	42.4
MWWA-09	43.1
T-51	14.7
T-52	56.7
T-53	47.7
T-54	239
T-55	236
T-56	24.9
T-57	112
T-58	44.9
T-59	112
T-60	97.4
T-61	34.9
T-62	88.0
T-63	139
T-64	14.0
T-65	55.5
T-66	40.3
T-67	27.0
T-68	21.2
T-69	72.1
T-70R	4.41
T-72	25.8
T-73	0.028
T-74	1.47
T-75	1.66
T-76	30.4
T-77	3.07
T-78	0.164
T-79	1.26
T-81	0.071
T-82	0.068
T-83	0.054
T-84	46.5
T-85	100
T-86	43.9
T-87	108
T-88	75.4
T-89	68.5
T-90	34.5
T-91	30.9
T-92R	36.3
T-93	54.5
T-94	18.7
T-95	49.0
T-96	31.6
T-97	10.2
T-98	0.862
T-99	37.4
T-100	39.5
T-101	27.2
T-102	22.3
T-103	4.02

FIGURE 3-1
NITRATE IN WESTERN AREA
FACILITY DECOMMISSIONING PLAN
REVISION 1

BURNS McDONNELL

environmental properties management, LLC

Legend

- MONITORING WELL IN ALLUVIUM
- MONITORING WELL IN SANDSTONE A
- MONITORING WELL IN SANDSTONE B
- MONITORING WELL IN SANDSTONE C
- MONITORING WELL IN TRANSITION ZONE
- NITRATE IN SSA/TRANSITION ZONE/WAA
- NITRATE IN SSB (22.9 UG/L)
- NITRATE IN SSB (52 UG/L)
- BURIAL AREA #3 REMEDIATION AREA
- WAA BLUFF REMEDIATION AREA
- WAA U<DCGL EAST REMEDIATION AREA
- WAA U<DCGL WEST REMEDIATION AREA
- WAA U>DCGL REMEDIATION AREA
- WUA 1206 REMEDATION AREA
- WUA 1348 REMEMDIATION AREA
- WUA PROCESS BUILDING AREA
- WUA UP1 REMEDIATION AREA
- WUA UP2 SSA REMEDATION AREA
- WUA UP2 SSB REMEDIATION AREA

Notes:
1) All concentrations reported in milligrams per liter (mg/L).
2) Green highlighting in table indicates state criterion exceedance (22.9 mgL; 52 mg/L in PBA).
3) Concentrations are "representative concentrations" from Basis of Design (Appendix L).

0 220 440 880 Feet

N

COORDINATES : (NAD 83) STATE PLANE OKLAHOMA NORTH FEET

DATE : MAP PRODUCED - 10/30/2018

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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322000 320000

Path: Z:\Clients\ENS\CERT_ClientInfo\Sites\Database\GeospatialMaps & DwgsvArcGIS\BMCD_Files\Arcdocs\2018\Updated D-Plan Figures\Figure 3-1_Nitrate in Western Area.mxd

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FIGURE 3-3
URANIUM IN WESTERN AREA
FACILITY DECOMMISSIONING PLAN
REVISION 1

LOCATION	URANIUM
1311	2.72
1312	22.1
1313	18.8
1319A-2	6.28
1319B-1	38.0
1319B-2	1.41
1319B-3	28.5
1319B-4	1.62
1319B-5	2.45
1320	2.20
1322	12.8
1324	1.62
1325	0.938
1326	4.20
1327B	4.10
1329	4.39
1330	5.65
1331	32.1
1333	21.0
1334	11.5
1335A	6.09
1336A	36.1
1337	6.69
1338	0.764
1340	8.46
1341	2.36
1343	21.28
1345	2.08
1346	5.46
1347	34.5
1348	71.3
1349	29.6
1350	14.3
1351	875
1352	125
1353	44.7
1354	3.05
1355	2.58
1356	572
1357	2.16
1358	1.57
1359	12.1
1360	23.9
1375	3.55
1376	15.4
1377	16.5
1378	2.25
1379	18.3
1380	10.5
1381	81.9
1382	1.26
1383	10.0
1384	0.635
1385	19.0
1386	1.23
1387	20.4
1388	1.35
1389	1.40
1390	1.54
1391	1.66
1392	1.05
1393	24.2
1394	1.00

LOCATION	URANIUM
1395	2.31
1396	7.17
1397	12.9
1398	0.990
1399	4.35
1400	2.77
1401	65.7
1402	4.05
1403	1.70
MWWA-03	527
MWWA-09	140
T-51	36.4
T-52	23.2
T-53	33.6
T-54	3.79
T-55	7.39
T-56	5.77
T-57	13.6
T-58	19.9
T-59	92.3
T-60	48.6
T-61	30.4
T-62	178
T-63	104
T-64	126
T-65	152
T-66	122
T-67	159
T-68	150
T-69	77.3
T-70R	97.7
T-72	141
T-73	10.4
T-74	13.8
T-75	76.7
T-76	173
T-77	86.8
T-78	17.5
T-79	62.8
T-81	11.0
T-82	34.3
T-83	14.3
T-84	48.1
T-85	27.8
T-86	22.9
T-87	22.0
T-88	9.94
T-89	50.7
T-90	24.8
T-91	27.8
T-92R	38.3
T-93	32.7
T-94	20.2
T-95	29.3
T-96	34.7
T-97	64.1
T-98	53.1
T-99	42.1
T-100	29.1
T-101	34.8
T-102	32.3
T-103	10.2

Legend

- MONITORING WELL IN ALLUVIUM
- MONITORING WELL IN SANDSTONE A
- MONITORING WELL IN SANDSTONE B
- MONITORING WELL IN SANDSTONE C
- MONITORING WELL IN TRANSITION ZONE
- URANIUM CONTOUR IN SSB (>30 UG/l)
- URANIUM CONTOUR IN SSA/TRANSITION ZONE/WAA
- BURIAL AREA #3 REMEDIATION AREA
- WAA BLUFF REMEDIATION AREA
- WAA U<DCGL EAST REMEDIATION AREA
- WAA U<DCGL WEST REMEDIATION AREA
- WAA U>DCGL REMEDIATION AREA
- WUA 1206 REMEDATION AREA
- WUA 1348 REMEMDIATION AREA
- WUA PROCESS BUILDING AREA
- WUA UP1 REMEDIATION AREA
- WUA UP2 SSA REMEDATION AREA
- WUA UP2 SSB REMEDIATION AREA

Notes:
1) All concentrations reported in micrograms per liter (ug/L).
2) Green highlighting in table indicates state criterion exceedance (30 ugL)
3) Blue highlighting in table indicates NRC criterion exceedance (201 ug/L; 119 in WU-BA3, 1206-North and WAA U>DCGIL).
4) Concentrations are "representative concentrations" from Basis of Design (Appendix L).

0 220 440 880 Feet

N

COORDINATES : (NAD 83) STATE PLANE OKLAHOMA NORTH FEET

DATE : MAP PRODUCED - 10/30/2018

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

2090000 2092000 2094000 2096000

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Path: Z:\Clients\ENSCERT_ClientInfo\Sites\Database\GeospatialMaps & Dwgs\ArcGIS\BMCD_Files\Arcdocs\2018\Updated D-Plan Figures\Figure 3-3_Uranium in Western Area.mxd

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Mr. Ken Kalman
U.S. Nuclear Regulatory Commission
April 16, 2019

ATTACHMENT 3
TABLE 9-1 FROM *FACILITY DECOMMISSIONING PLAN – REV 1*

Table 9-1
Monitor Wells to be Abandoned

Site Area	Well	Formation	Rationale
Process Building Area	1319A-1	Sandstone A	COC Concentrations have never been above State Criteria
	1319A-2	Sandstone A	COC Concentrations have never been above State Criteria
	1319A-3	Sandstone A	COC Concentrations have never been above State Criteria
	1319B-2	Sandstone B	COC Concentrations have never exceeded State Criteria, and will be upgradient from extraction well throughout
	1319B-5	Sandstone B	
	1319C-1	Sandstone C	Uranium concentrations are elevated background. Other COCs have never exceeded State Criteria.
	1319C-2	Sandstone C	Uranium concentrations are elevated background. Other COCs have never exceeded State Criteria.
	1319C-3	Sandstone C	Uranium concentrations are elevated background. Other COCs have never exceeded State Criteria.
	1326	Sandstone A	COC Concentrations have never excceeded State Criteria
	1327B	Sandstone A	COC Concentrations have never excceeded State Criteria
	1328	Sandstone C	Uranium concentrations are elevated background; Other COCs have never exceeded State Criteria.
	1329	Sandstone A	COC Concentrations have never excceeded State Criteria
	1330	Sandstone A	COC Concentrations have never excceeded State Criteria
	1374	Sandstone A	Well has been dry since development.
	1375	Sandstone A	COC Concentrations have never excceeded State Criteria
	1376	Sandstone A	COC Concentrations have never excceeded State Criteria

Table 9-1
Monitor Wells to be Abandoned

Site Area	Well	Formation	Rationale
Burial Area #2	1322	Sandstone A	COC Concentrations have never excceeded State Criteria
	1323	Sandstone C	Uranium concentrations are elevated background; Other COCs have never exceeded State Criteria.
	1332	Sandstone C	Uranium concentrations are elevated background; Other COCs have never exceeded State Criteria.
	1333	Sandstone A	Uranium concentrations have dropped below State Criteria. Other COCs have never exceeded State Criteria
	1380	Sandstone A	COC Concentrations have never excceeded State Criteria
Burial Area #4	1339	Sandstone C	COC Concentrations have never excceeded State Criteria
	1325	Sandstone A	COC Concentrations have never excceeded State Criteria
1206 Drainage	1349	Sandstone A	Uranium concentrations have dropped below State Criteria. Other COCs have never exceeded State Criteria
	1353	Sandstone A	Uranium concentrations have dropped below State Criteria. Other COCs have never exceeded State Criteria
	1334	Sandstone A	COC Concentrations have never excceeded State Criteria
NW Corner of WAA	1342	Alluvium	COC Concentrations have never excceeded State Criteria, and well is unrelated to any contaminant plume.