

ATTACHMENT 1C.9

Plug and Abandon Monitoring Wells
Site Wide



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Introduction

Arcadis proposed a network of monitoring wells in a letter submitted to TCEQ on May 5, 2015 regarding Request to Plug and Abandon Monitoring Wells, dated May 5, 2015 and on Figure 5A “RAER and PRACR Monitoring Points” in Attachment 5A of the Response Action Plan (RAP, Arcadis 2016e) designed to demonstrate that the response actions have effectively mitigated potential exposures to COCs in soil and groundwater above their respective PCLs.

However, there remain additional wells from previous investigations which will not be a part of the future monitoring well network. These wells need to be plugged and abandoned. Therefore, the May 5, 2015 letter also requested approval to plug and abandon (P&A) 30 monitoring wells at various locations on the Site to prepare for constructing the final cover systems. TCEQ approved the proposal to abandon the 30 wells, including an additional well requested by email, in a June 2, 2015 letter to TCT (included in this Attachment).

Arcadis described this P&A work in a Letter to TCEQ regarding Plant Site Plugging and Abandonment Report, dated January 21, 2016 (included in this Attachment). The locations of the abandoned monitoring wells are shown on Figure 1 of that report.

The purpose of the P&A work to that point was to remove unnecessary wells so that construction of the plant cover could proceed. Finally, Arcadis submitted a Letter to TCEQ regarding Request to Plug and Abandon Monitoring Wells, dated January 21, 2016 (included in this Attachment) to abandon 62 monitoring wells, plus one additional well in a February 19, 2015 email, that are not part of the network of monitoring wells proposed in the RAP and the May 5, 2015 letter to TCEQ. In a February 22, 2016 letter response (included in this Attachment), TCEQ approved the P&A of the monitoring wells proposed for closure. These wells will be abandoned in 2017.

Supporting Documentation Included in this Attachment

- Letter from TCEQ regarding Approval of the following submittals: Request to Plug and Abandon Monitoring Wells, dated May 5, 2015 and Request to Include EP-86 for Plugging and Abandonment; dated June 2, 2015
- Letter to TCEQ regarding Plant Site Plugging and Abandonment Report, dated January 21, 2016 (*reports P&A of 31 wells in 6/2015*)
- Letter to TCEQ regarding Request to Plug and Abandon Monitoring Wells, dated January 21, 2016 (*requests approval to P&A 62 additional wells*)
- Letter from TCEQ regarding Comments to the following documents: Request to Plug and Abandon Monitoring Wells, dated January 21, 2016; dated February 22, 2016
- Letter from TCEQ regarding Acknowledgement of Receipt of Plant Site Plugging and Abandonment Report, dated January 21, 2016; dated February 22, 2016