

**WASTE CONTROL
SPECIALISTS LLC**

R05807
Log No. 2009-04-0004

April 9, 2009

Ms. Susan Jablonski, P.E.
Director, Radioactive Materials Division
Texas Commission on Environmental Quality
P O Box 13807, MC-233
Austin, Texas 78711-3087

Reference: Radioactive Material License No. R05807
CN 600616890, RN 104392790

**Subject: Monthly OAG Water Level Report Submitted in Support of License
Condition 44, Waste Control Specialists LLC, Andrews County, Texas**

Dear Ms. Jablonski:

License Condition 44 of License No. R05807 requires Waste Control Specialists LLC (WCS) to conduct water level elevation measurements monthly to monitor potential movement of the dry line and report the elevations to the Executive Director.

Attachment 1 provides the March, 2009 water level elevations for all OAG monitoring wells on the WCS facility, including a map of OAG wells in and near the 1338 acres of WCS operations, as well as a smaller scale map of all OAG wells on the WCS facility. The maps include an indication of whether the wells are dry or have water and, where there is water in the well, the thickness of water above, or in the case of negative numbers, below the top of the Dockum. The March, 2009 OAG water level data is also provided as an Excel file on the attached CD.

On the larger scale map, the distribution of dry wells and wells with measurable water in and near the 1338 acres of the WCS operations is substantially the same in the March, 2009 measurements as in the February, 2009 measurements. The smaller scale map shows a distribution of OAG dry wells and wells with measurable water similar to the OAG water level map (Figure 6-3) in Appendix 2.6.1, Geology Report in the Application for License to Authorize Near-Surface Land Disposal of Low-Level Radioactive Waste (License Application). In Figure 6-3 of the License Application, TP-19 and TP-39 were shown within an area of isolated saturation at the northern boundary of the Compact Waste Facility (CWF), whereas this area is currently dry. Water levels in both wells have declined below the screen slots. An additional area of isolated saturation in the vicinity of the B-41 boring series on the eastern boundary of the CWF has not been confirmed by new CWF perimeter OAG well CWF-8A, which is dry. **Additional OAG wells (TP-100, TP-118 and TP-105) in the northern elbow between the CWF and Federal Waste Facility (FWF) indicate saturated conditions in the OAG extend south into the elbow outside the FWF and CWF boundaries about 200 feet further than the estimated dry line shown in Figure 6-3 of the License Application.**

In the vicinity of the byproduct material landfill saturated conditions have been measured in several wells, including some on the southwest corner of the FWF. This area is isolated from the larger area of OAG saturation away from the facilities. The saturated conditions are related to former

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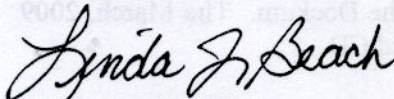
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small playas at the southern boundaries of the byproduct material/FWF landfills, as well as to infiltration of interrupted surface drainage which occurred due to construction of the Low Specific Activity (LSA) pad and haul roads for the RCRA landfill expansion. Drainage improvements have subsequently minimized the potential for infiltration. A detailed assessment of OAG water in the vicinity of the byproduct landfill will be submitted in support of the byproduct material license amendment related to the red bed bench.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any further questions please contact me at 575-394-4300 or lbeach@wcstexas.com.

Sincerely,



Linda Beach, P.E.
Vice President and General Manager

Cc: William Dornsife, P.E., WCS
Jeff Skov, WCS
Mike Woodward, Hance Scarborough
Pam Giblin, Baker Botts
Steve Cook, P.E., Cook-Joyce Inc
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