

United States Department of Energy



# LONG-TERM SURVEILLANCE PLAN FOR THE MAYBELL, COLORADO DISPOSAL SITE

September 1997

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MASTER

Uranium Mill Tailings Remedial Action Project



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## 2.0 FINAL SITE CONDITIONS

### 2.1 SITE HISTORY

The Maybell site was established by the Trace Element Corporation. After it assumed control of the site, Umetco began milling operations in 1957; uranium ore was obtained from nearby open pit mines. During the 7 years of operation by Umetco, the mill processed approximately 2.6 million tons of ore. After the mill shut down in November 1964, Umetco dismantled it and began stabilizing the tailings in 1971 in accordance with Colorado regulations.

The DOE began constructing the disposal cell in 1995. The existing tailings were left in place, but reshaped. Windblown contaminated material and other residual radioactive materials (such as contaminated demolition debris, soil, and vicinity property materials) were placed on top of the existing tailings. Cell construction was completed in 1998 with the placement of a radon/infiltration barrier and frost and erosion protection layers.

### 2.2 GENERAL DESCRIPTION OF THE SITE VICINITY

The Maybell site is approximately 25 miles (mi) (40 kilometers [km]) west of Craig, Colorado, in Moffat County (Figure 2.1). The site is 5 mi (8 km) north of the Yampa River. Running east-west, U.S. Highway 40 is approximately 2 mi (3 km) south of the site (Figure 2.2). The small town of Maybell is about 5 road mi (8 km) southwest of the site. The nearest residence is 2.9 mi (4.7 km) southwest of the site. The area is relatively flat with some low, flat-topped mesas.

The UMTRA Maybell disposal cell is located in a mining district, which contains numerous abandoned uranium mines. Rob Pit is approximately 2000 feet (ft) (610 meters [m]) west of the Maybell disposal cell. Rob Pit is currently a large open hole with standing water at the bottom. Johnson Pit is approximately 1000 ft (305 m) south of the Maybell cell. Johnson Pit has been partially backfilled with mine overburden soil and rock. Several reclaimed and unreclaimed overburden piles are located in the area of the Maybell site. A heap leach pile is located approximately 0.75 mi (1.2 km) to the west.

The climate in the vicinity of the Maybell disposal cell is semiarid. The average annual precipitation in the town of Maybell is 11.7 inches (29.7 centimeters [cm]) and is distributed relatively uniformly throughout the year. The snowfall accumulation is approximately 65 inches (170 cm) per year and generally does not result in rapid runoff. Data from the airport in Craig, Colorado, show the prevailing winds are from the west-southwest, and to a lesser degree from the east-northeast. The prevailing wind at the tailings pile is easterly (URS Company, 1976).

### 3.0 SITE INSPECTIONS

The DOE will inspect the Maybell disposal site to detect progressive change caused by slow-acting natural processes and to identify potential problems before the need for extensive maintenance, repairs, or corrective action. Inspections also may be conducted to follow up on events or conditions that have affected the disposal site (Attachment 2). The DOE will compare the findings from these inspections to initial baseline conditions to identify changes over time and to provide a basis for future inspections, repairs, and corrective actions. This process is shown in Figure 3.1. Custodial maintenance and repair are described in Section 4.0. Corrective action is detailed in Section 5.0.

#### 3.1 INSPECTION FREQUENCY

The DOE will inspect the Maybell disposal site annually. The DOE may schedule more frequent inspections, if necessary. The DOE will notify the NRC of the inspection schedule.

#### 3.2 INSPECTION TEAM

The inspection team will consist of a minimum of two inspectors qualified to inspect disposal cell integrity and make preliminary assessments of modifying processes that could adversely affect the disposal cell.

If problems are observed that require more investigation, follow-up inspections will be performed and teams will include one or more technical specialists in appropriate disciplines to assess the problems under investigation. For example, a follow-up inspection by a plant specialist may be required to evaluate reports of significant plant growth on the rock cover or a soils scientist or geomorphologist may be needed to evaluate erosion processes.

#### 3.3 SITE INSPECTION PROCEDURES

Before inspections, inspectors will conduct a preinspection briefing. The long-term surveillance program guidance document contains information useful in preparing for inspections (DOE, 1996a).

Site inspections will cover the disposal cell, the area immediately surrounding the disposal site, and the immediate offsite areas. Site inspections will be thorough enough to identify significant changes or active modifying processes that potentially could adversely impact the disposal cell. Surveillance should be performed to identify unanticipated effects of modifying processes such as gully formation, slope erosion, changes to the rock cover, ephemeral drainage channel changes, and significant modifications by humans, animals, or plants.

Inspectors will evaluate the integrity of the disposal cell by walking a series of transects around the perimeter and over the rock cover. Sufficient transects, at

at the outlets of these gullies during construction. Above the erosion protection rock, all four gullies were filled with compacted common fill to the toe of the disposal cell (see sections B and J on construction drawings MAY-PS-10-0214 and MAY-PS-10-0223). The upper end of gully 2 extended beneath the tailings pile.

To monitor potential erosion damage, the inspectors will check for erosion and any changes in headcutting or sedimentation in and around gullies 1 through 4, between these gullies, and the toe of the disposal cell (Plate 1).

### **3.5.2 Postconstruction settlement**

Characterization of the Maybell tailings pile indicated a rather thick deposit of slimes exists beneath the south central portion of the pile. To promote settlement of these slimes before construction of the radon barrier, a preload fill was constructed (see drawing MAY-PS-10-0209 and Note 8).

During construction, six settlement plates, numbers 1 through 9, were installed for long-term monitoring (see drawing MAY-PS-10-0211). Calculations indicate that significant settlements of the Maybell pile should occur during the first 5 years after placement of the frost protection layer. Inspectors will annually monitor the settlements of plates 1 through 9 (Plate 1) to confirm the predicted settlement profiles are not exceeded for a period of 5 years or less, if trending indicates all significant settlement has occurred.

### **3.5.3 Potential for transient drainage seeps**

During disposal cell construction, the slopes on the east side of the pile were cut back to form the final slope configuration. Although not confirmed directly by characterization data, extrapolation of those data indicates the cut slope near the east corner of the cell may be near buried slime layers. If transient drainage from the slimes formed a surface expression on the Maybell cell, it would be located on the east or southeast slopes toward the east corner of the cell.

While walking routine transects over the east and southeast slopes of the cell, inspectors will check for evidence of potential seeps. Potential seeps will not form after transient drainage is complete.

### **3.5.4 Monitoring transient drainage**

During design and planning, NRC representatives expressed concern that transient drainage from the cell could be observed in nearby monitor wells as a temporary rise in the ground water level, and might mistakenly be interpreted as a cell performance problem or even cell failure. Misidentification of the cause of a water level rise could falsely trigger an investigation of cell cover integrity, needlessly consuming resources and funds.

Computer modeling was performed to predict an "upper bound" curve of water level versus time for monitor well 695. Complete documentation of this modeling is included in the Technical Assistance Contractor Calculation MAY-03-96-12-05-00,

dated 8 April 1996, which is on file in the UMTRA Project Document Control Center, File Location No. 14.19.2.7. The monitoring and closure plan for monitor well 695 is included in the appendix to this LTSP.

Well 695 is monitored to compare the measured water level with the predicted water level shown in Appendix A, Figure 1. If the measured water levels are below the predicted water levels, and the trend line of measured water levels is not expected to cross the predicted line shown in Appendix A, Figure 1, the cell's cover performance should be satisfactory.

#### 4.0 CUSTODIAL MAINTENANCE OR REPAIR

The DOE does not plan to conduct routine maintenance at the Maybell disposal site. However, the DOE will perform needed custodial maintenance or repair as determined by site inspections.

Unscheduled custodial maintenance or repair at the Maybell disposal site may be identified during an annual inspection. These activities may include the following:

- Repairing or replacing deteriorated or vandalized warning signs, fencing, gates, locks, and monitor well caps.
- Removing deep-rooted plants determined to be a threat to the integrity of the cover.

For a period up to five (5) years after completion of the disposal cell, a plant specialist or other qualified person will periodically participate in site inspections. If the inspection does not coincide with the general growing season, the individual may conduct a separate inspection at a more favorable time. Conditions such as drought during the five year period immediately following cell completion may cause the revegetation to die.

The Department of Energy is required to reseed those portions of the temporary withdrawal area that have not sustained a satisfactory growth of vegetation after the second and fourth growing season (2000 and 2002). In either eventuality, seeding must be completed after 1 September and prior to the onset of prolonged ground frost.

Reseeding will be performed per subcontract document specifications Section 02935, Part 2 (DOE, 1994).

After the work is completed and before contractors are released, the DOE will verify that work was performed according to specifications.

The annual report to the NRC will document any repair that is performed. Copies of records, reports, and certifications will be included in the permanent site file.



## 5.0 CORRECTIVE ACTION

Corrective actions are repairs needed to address problems that affect the integrity of the disposal cell or compliance with 40 CFR Part 192. The NRC must approve the recommended action in advance. Site inspections are designed to identify problems at the developmental stage. Conditions that might trigger corrective action are:

- Surface rupture or subsidence of the disposal cell.
- Development of rills, gullies, or slope instability on the disposal cell.
- Deterioration of the erosion protection rock on the disposal cell.
- Tailings fluid originating from the disposal cell.
- Gully development on or immediately adjacent to disposal site property that could affect the integrity of the disposal cell.
- Damage to the cell cover or disposal site property from natural catastrophic events or vandalism.
- Damage to the disposal cell cover from deep-rooted plant growth.

The DOE will evaluate the factors that caused the problem and identify actions to mitigate the impact and prevent recurrence. An onsite inspection or preliminary assessment will include but is not limited to:

- Identifying the nature and extent of the problem.
- Reevaluating germane engineering design parameters.

For conditions that warrant follow-up inspections, the DOE will submit a preliminary assessment or status report to the NRC within 60 days of the inspection. The preliminary assessment report will evaluate the problem and recommend the next step (e.g., immediate action or continued evaluation). If the problem requires immediate repair, the DOE will develop a corrective action plan for NRC approval. Once the NRC approves the corrective action, the DOE will implement the plan. In some cases, corrective action could include temporary emergency measures taken prior to the completion of the normal approval process. If a problem does not require immediate repair, the problem will be documented in the annual report and assessed at the next annual inspection.

NRC regulations do not stipulate a time frame for implementing corrective action except the finding of an exceedance in established ground water concentration limits, which does not apply at this site. The DOE does not consider assessing the extent of a problem and developing a corrective action plan to be initiation of the corrective action program.

In addition to the preliminary assessment report, the DOE may, as appropriate, prepare progress reports on each corrective action while it is under way or under evaluation.

After corrective action is complete, the DOE will certify the work and submit a certification statement with supporting documentation to the NRC for review and concurrence. A copy of the certification statement will become part of the permanent site file, as will reports, data, and documentation generated during the corrective action.

## **6.0 RECORD KEEPING AND REPORTING**

### **6.1 PERMANENT SITE FILE**

The DOE will maintain a permanent site file containing site inspection reports and other supporting documentation of long-term surveillance program activities. The information placed in the site file will include:

- Documentation of disposal site performance.
- Demonstration that licensing provisions were met.
- Information needed to forecast future site surveillance and monitoring needs.
- Reports to stakeholders regarding disposal cell integrity.

After the site is brought under the general license, the DOE will compile copies of site documentation required by the long-term surveillance program guidance document (DOE, 1996a). These copies will become part of the Maybell disposal site permanent site file. Copies of deeds, custody agreements, and other property documents also will be kept in the site file.

The DOE will maintain the surveillance and maintenance documentation identified in other sections of this LTSP and it will become part of the permanent site file. The DOE will update the site file as necessary after disposal site inspections, maintenance activities, or corrective actions are complete. These records will be handled in accordance with DOE directives to ensure their proper handling, maintenance, and disposition. The archival procedures set forth in 41 CFR Part 101 and 36 CFR Parts 1220-1238, Subchapter B, will be followed. The permanent site file will be available for NRC and public review.

### **6.2 INSPECTION REPORTS/ANNUAL REPORTS**

During site inspections, activities and observations will be recorded and described using site inspection checklists, maps, photographs and photo logs, and field notes. Documentary evidence of anomalous, new, or unexpected conditions or situations will describe developing trends and enable the DOE to make decisions concerning follow-up inspections, custodial maintenance, and corrective action. This information will be contained in the permanent site file at the DOE Grand Junction Office. The DOE will prepare a site inspection report documenting the findings and recommendations from field inspections.

Site inspection reports will be submitted to the NRC within 90 days of the annual site inspection. Inspection reports will summarize the results of follow-up inspections and maintenance completed since the previous annual inspection.

If unusual damage or disruption is discovered at the Maybell disposal site during an inspection, a preliminary report assessing the impact will be submitted to the NRC within 60 days. If maintenance, repair, or corrective action is warranted, the DOE will notify the NRC. The NRC will receive a copy of corrective action plans and each corrective action progress report, or the reports will be attached to the annual report.

The DOE will provide copies of inspection reports and other reports generated under the long-term surveillance program to the state of Colorado as required in its cooperative agreement.

## 7.0 REFERENCES

- DOE (U.S. Department of Energy), 1996a. *Guidance for Implementing the Long-Term Surveillance Program for UMTRA Project Title I Disposal Sites*, DOE/AL-62350-189, Rev. 0, prepared for the U.S. Department of Energy, Environmental Restoration Division, UMTRA Project Team, Albuquerque, New Mexico.
- DOE (U.S. Department of Energy), 1996b. *Long-Term Surveillance and Maintenance Program, Quality Assurance Program Plan*, MAC-2152, Rev. 0, prepared by MACTEC Environmental Restoration Services for the U.S. Department of Energy, Grand Junction Office, Grand Junction, Colorado.
- DOE (U.S. Department of Energy), 1994. *Remedial Action Plan and Site Design for Stabilization of the Inactive Uranium Mill Tailings Site, Maybell, Colorado*, December, DOE/AL/62350-24F, Rev. 1, prepared for the U.S. Department of Energy, Environmental Restoration Division, UMTRA Project Team, Albuquerque, New Mexico.
- MK-F (Morrison Knudsen-Ferguson), 19xx. *Maybell, Colorado, Completion Report*, prepared by MK-F for the U.S. Department of Energy, Environmental Restoration Division, UMTRA Project Team, Albuquerque, New Mexico.
- URS Company, 1976. "Meteorology Affecting Uranium Tailings Near Maybell, Colorado," unpublished report prepared for Ford, Bacon & Davis Utah, Inc., Salt Lake City, Utah.

## CODE OF FEDERAL REGULATIONS

- 10 CFR Part 40, *Domestic Licensing of Source Material*, U.S. Nuclear Regulatory Commission.
- 36 CFR Parts 1220-1238, *National Archives and Records, Subchapter B- Records Management*, National Archives and Records Administration.
- 40 CFR Part 192, *Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings*, U.S. Environmental Protection Agency.
- 41 CFR Part 101, *Federal Property Management Regulations*, General Services Administration.

## DOE ORDERS

- Order 5700.6C, *Quality Assurance*, 21 August 1991, U.S. Department of Energy, Washington, D.C.

## UNITED STATES CODE

- 42 USC §7901 *et seq.*, *Uranium Mill Tailings Radiation Control Act*, 8 November 1978.

**ATTACHMENT 1**  
**SITE REAL ESTATE INFORMATION**

## REAL ESTATE DOCUMENTATION

### GENERAL

Remedial action at the Maybell, Colorado, Uranium Mill Tailings Remedial Action (UMTRA) Project site consisted of onsite consolidation and stabilization of the contaminated materials. The site comprises approximately 251 acres of land. The site was acquired in two portions.

The larger portion of the disposal site is on land formerly administered by the U.S. Department of the Interior's (DOI) Bureau of Land Management (BLM). Under the requirements of the Uranium Mill Tailings Radiation Control Act (UMTRCA) of 1978, as amended, the DOE acquired this portion of the disposal site land via Public Land Order (PLO).

The second portion, acquired by the state of Colorado, comprises two properties referred to as the Howsam and Gordon properties. The state acquired the properties in fee simple from the private owners. The 2 properties comprise approximately 110 acres.

### TRANSFER OF BLM LANDS

The PLO permanently transferred 141 acres from the public domain to the DOE. As a result of the transfer, the land is no longer subject to the operation of the general land laws, including the mining and mineral leasing laws. The transfer of the land to the DOE vested in the DOE the full management, jurisdiction, responsibility, and liability for the land. However, the BLM retained the authority to administer any claims, rights, and interests in the land established before the effective date of the transfer.

### Legal Description

A tract of land located in Township 7 North, Range 43 East, Sixth Principal Meridian, described by the following government land survey. Section 19, lots, 10, 12, 14, and 16. W1/2 E1/2 SW1/4 NE1/4, W1/2 E1/2 NE1/4 SW1/4 NE1/4, W1/2 SW1/4 NE1/4, SE1/4 NW1/4, W1/2 W1/2 NE1/4 NW1/4 SE1/4, and W1/2 NW1/4 SE1/4. The area described contains 140.49 acres of public land in Moffat County, Colorado.

### Recorded

The PLO was published in the *Federal Register*, Volume 60, No. 71, page 18778, dated 13 April 1995. The *Federal Register* document is listed as 95-9048 filed 12 April 1995 as 43 CFR Public Land Order 7137. The effective date of the transfer is 13 April 1995.

## TRANSFER OF PRIVATE LANDS

### Legal Descriptions

#### **Howsam tract**

A parcel of land situated in the SW1/4 of Section 19, T.7 N., R. 94 W., 6th Principal Meridian, being more particularly described as follows:

Considering the East line of the Northeast of said Section 19 to bear S00°00'00"E and all bearings contained herein to be relative thereto; Beginning at the Center 1/4 corner of said Section 19; thence S. 00°00'11"E 1,813.80 ft the Southwest corner of the N3/4 NW1/4 SW1/4 SE1/4 of Section 19; thence N89°58'15 "W 2103.37 ft to the Southwest corner of the N1/2 S1/2 NE1/4 of Government Lot 8 of said Section 19, thence N00°01'20"E 164.88 ft to the Southeast corner of the NE1/4 NW1/4 of Government Lot 8 of said Section 19; thence N89°58'16"W 391.26 ft to the Southwest corner of the NE1/4 NW1/4 of Government Lot 8 of said Section 19; thence N00°02'01"E 1648.81 ft to the Northwest corner of the E1/2 W1/2 of Government Lot 7 of said Section 19; thence S89°58'24"E 2493.50 ft to the Point of Beginning, containing 102.37 acres, as described,

with all its appurtenances subject to existing easements for public roads and highways, public utilities, railroads, pipelines and reservations or exceptions of record. The land herein conveyed to the United States of America by and through the Department of Energy.

**Filed:** \_\_\_\_\_ at \_\_\_\_\_ Book \_\_\_\_\_, on Page \_\_\_\_\_, Moffat County, Colorado.  
(To be completed when filed.)

#### **Gordon tract**

A parcel of land situated in the SE1/4 of Section 19, T.7 N., R. 94 W., 6th Principal Meridian, being more particularly described as follows:

Considering the East line of the Northeast of said Section 19 to bear S00°00'00"E and all bearings contained herein to be relative thereto; Beginning at the Northwest corner of N3/4 NW1/4 SW1/4 SE1/4 (the South 1/16 Corner of Section 19); thence S89°58'17"E 660.48 ft to the Northeast corner of the N3/4 NW1/4 SW1/4 SE1/4 of said Section 19, thence S00°00'00"E 494.68 ft to the Southeast corner of the N3/4 NW1/4 SW1/4 SE1/4 of said Section 19; thence N89°58'15"W 660.46 ft to the Southwest corner of the N3/4 NW1/4 SW1/4 SE1/4 of said Section 19; thence N 00°00'11"W 494.67 ft to the Point of Beginning, containing 7.50 acres, as described,

with all its appurtenances subject to existing easements for public roads and highways, public utilities, railroads, pipelines and reservations or exceptions of record. The land herein conveyed to the United States of America by and through the Department of Energy.

**Filed:** \_\_\_\_\_ at \_\_\_\_\_ Book \_\_\_\_\_, on Page \_\_\_\_\_, Moffat County, Colorado.  
(To be completed when filed.)



## REPOSITORY

Real estate correspondence and related documents are filed and maintained by the Department of Energy's Property and Administrative Services Division, C/O Chief, Property Management Branch, Albuquerque Operations Office, P. O. Box 5400, Albuquerque, NM 87115, (505) 845-6450.

**ATTACHMENT 2**

**NRC CONCURRENCE AND LICENSING DOCUMENTATION**

(To be provided when the site is licensed)

**APPENDIX A**

**MONITORING AND CLOSURE PLAN FOR WELLS 695 AND 696**

## 1.0 INTRODUCTION

### 1.1 Purpose

The purposes of this appendix are to explain the ground water conditions as they relate to impacts from milling operations and construction-related drainage at the Maybell disposal cell, document water level monitoring downgradient from the cell, assess results of the monitoring, and formulate a plan for closure of the two monitor wells used for measuring water levels.

### 1.2 Background

Analysis of the ground water conditions at the site showed that the uranium milling/processing operations impacted ground water levels in the vicinity of the disposal cell and that construction-related drainage from the cell also would impact the water levels. Residual radioactive materials at the Maybell processing site were stabilized in place. There appears to be a residual ground water mound as a result of the 7 years of leakage from the tailings pond to the ground water during the milling operations. The mound is still dissipating 30 years after the mill closed. Current groundwater levels beneath the tailings pile are estimated to be 80 to 90 feet (ft) (24 to 27 meters [m]) above levels that existed prior to mill operation. Mounding of the ground water table presently appears to extend several thousand feet in all directions from the existing tailings pile. It is anticipated that this mound will take several hundred years to completely dissipate. During and after remedial action construction, as the tailings consolidate under the load from the relocated tailings and the cover, water will be released that will impact water levels below the disposal cell. This transient drainage from construction of the disposal cell will be superimposed on the milling-related ground water mound.

During remedial action design and planning, the NRC expressed concern that transient drainage from the disposal cell could be observed in nearby monitor wells as a temporary rise in the ground water level, and might mistakenly be interpreted as a cell performance problem or even cell failure. Misidentification of the cause of a water level rise could falsely trigger an investigation of cell cover integrity, needlessly consuming resources and funds.

## 2.0 WATER LEVEL MONITORING

### 2.1 Monitoring plan

The DOE plans to perform postclosure ground water level monitoring downgradient from the disposal cell as a "best management practice" (BMP). The purpose of this BMP monitoring is to measure changes in ground water levels in monitor wells 695 and 696 that may be related to transient drainage caused by disposal cell construction.

Computer modeling to simulate existing ground water conditions at the Maybell site and predict the effects of transient drainage resulting from remedial action construction has been performed (Calculation No. MAY-03-96-12-05-00). The modeling has provided a better understanding of site ground water conditions, the dissipation rate of the ground water mound beneath the site, and the potential water-level impacts of transient drainage. Based on this understanding, evaluation of transient drainage by monitoring ground water levels downgradient from the site may not be fully definitive because the potential increase in water level resulting from transient drainage would be masked by the predicted water-level decrease due to dissipation of the ground water mound. That in turn would be affected by the natural fluctuation of ground water levels in the area.

To verify the modeling predictions, periodic measurements of ground water levels in monitor wells 695 and 696 will continue. BMP monitoring is not required under the regulations for the purpose of demonstrating compliance with the final U.S.

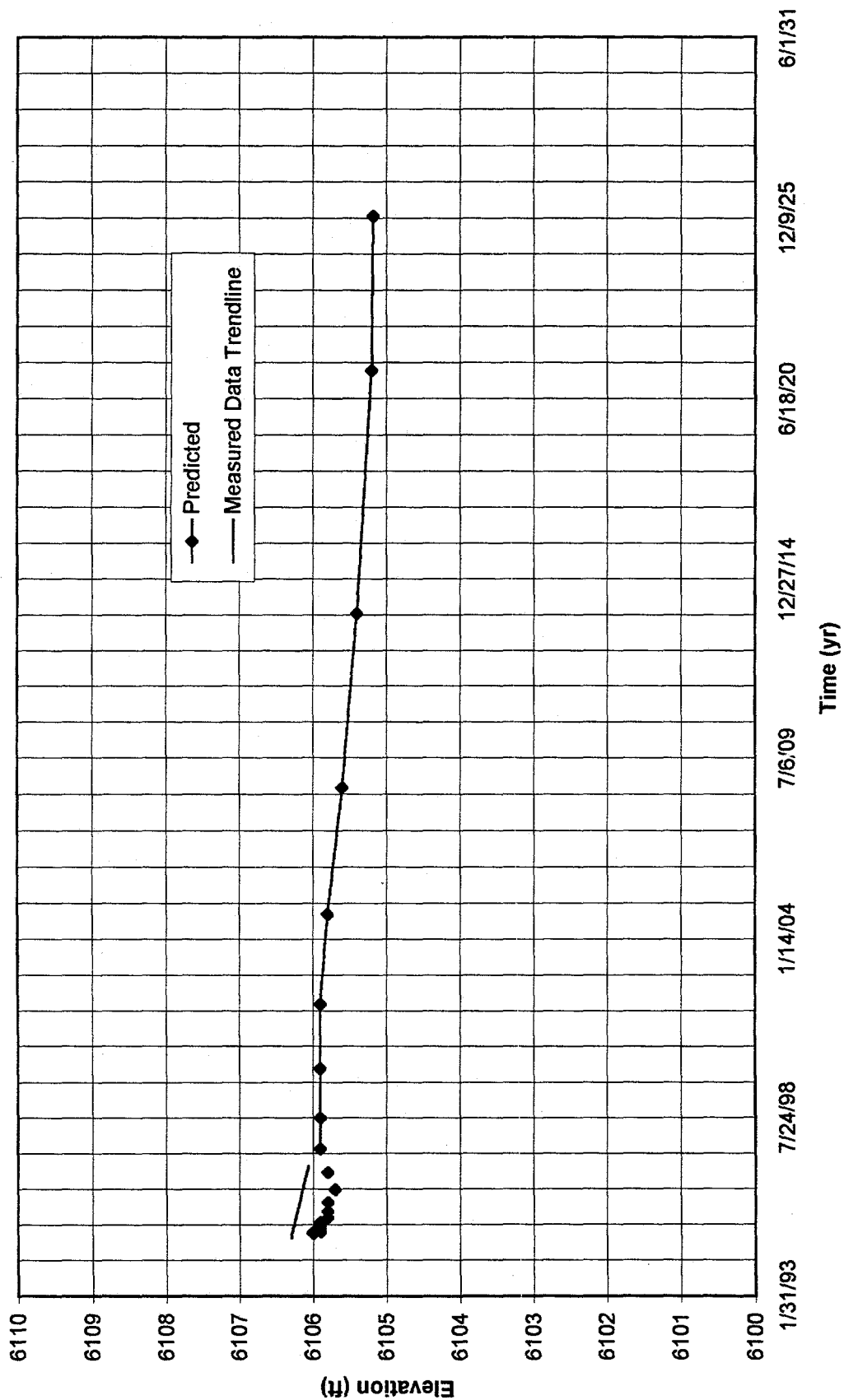
Environmental Protection Agency ground water protection standards (40 CFR §192.02) and will not trigger corrective action (40 CFR §192.04).

### 2.2 Monitoring results

Monitor wells 695 and 696 were installed downgradient from the Maybell disposal cell in October 1994. A data logger has recorded water levels continuously in monitor well 695 since November 1995, while the data logger assigned to well 696 is temporarily on loan to another Uranium Mills Tailing Remedial Action (UMTRA) Project site. Data are available in the SEEUMTRA data base (available at the Grand Junction Office).

Monitor wells 695 and 696 are on the southwest side of the cell, which is downgradient of the tailings pile. The change in water level at monitor well 695 estimated to be approximately 2 ft (6 centimeters [cm]) due to transient drainage from the disposal cell. Since the general water level around wells 695 and 696 is falling due to the decreasing ground water mound caused by milling operations, the net change in water level in well 695 (due to the UMTRA Project-caused transient drainage), should be on the order of 0.2 ft (6 cm) (Figure 1). This very small net rise is the reason that a data logger is being used for monitoring at the site.

**FIGURE 1**  
**Future Groundwater Levels at Well 695 - Maybell**



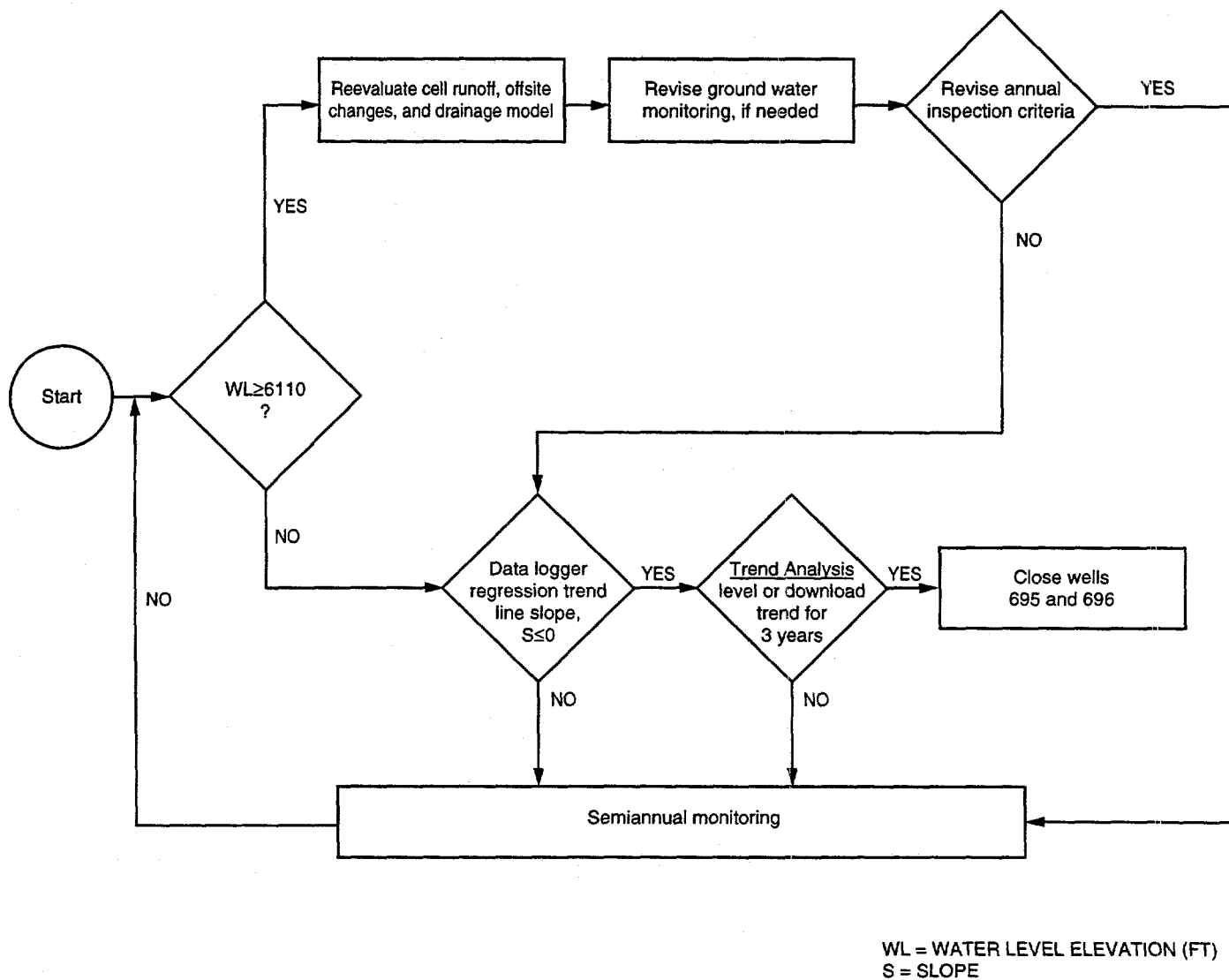
### 3.0 MONITOR WELL CLOSURE PLAN

#### 3.1 Decision criteria

The decision to discontinue water level monitoring and close the monitor wells downgradient from the disposal cell at the Maybell site will be based on the flow chart of monitoring activities (Figure 2). The data loggers at the Maybell site should be downloaded twice each year. The data from monitor well 695 should then be compared with the predicted levels. As long as the 6-month water level trend is approximately parallel to the predicted trend, no action is necessary.

#### 3.2 Well closure

When the water levels downgradient from the disposal cell show a consistent trend, as determined by the flow chart in Figure 2, water level monitoring will be discontinued and the monitor wells will be abandoned. When the flow chart in Figure 2 indicates well closure, monitor wells 695 and 696 may be abandoned in accordance with UMTRA Project and state of Colorado procedures.



**FIGURE 2**  
**FLOWCHART FOR CLOSURE OF MONITORING WELLS 695 AND 696**  
**MAYBELL, COLORADO, SITE**



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