FACT SHEET

PART IV, CORRECTIVE ACTION 1, WASTE MANAGEMENT UNITS
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UNIT DESCRIPTION

A waste management unit represents any location within the boundary of the Hanford Site that may require action to mitigate a potential environmental impact under the Resource Conservation and Recovery Act (RCRA).

A past-practice unit is a waste management unit where the Permittees have disposed of wastes or substances, intentionally or unintentionally, and that is not subject to regulation as a permitted treatment, storage, or disposal (TSD) unit.

Hanford has a large number of past-practice units. They are organized into groups called operable units. This organizes numerous units into manageable components for investigation and response action, and to set priorities for Hanford cleanup work. (Tri-Party Agreement Action Plan Section 3.3) The compliance schedule in Tri-Party Agreement Appendix D shows how the agencies have prioritized the cleanup work.

We designate the operable units as either Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Past Practice (CPP) or as RCRA-CERCLA Past Practice (R-CPP). The operable units (waste management unit groupings) listed in Tri-Party Agreement Appendix C are:

CERCLA Past-Practice (CPP) Groups

| 100-BC-1 | 100-HR-2 | 200-CB-1 | 200-OA-1 |
| 100-BC-2 | 100-IU-2 | 200-CP-1 | 200-PW-1 |
| 100-DR-1 | 100-IU-6 | 200-CR-1 | 200-PW-3 |
| 100-DR-2 | 100-KR-1 | 200-CU-1 | 200-PW-6 |
| 100-FR-1 | 100-KR-2 | 200-CW-1 | 200-WA-1 |
| 100-FR-2 | 100-NR-1 | 200-CW-3 | 300-FF-1 |
| 100-HR-1 | 200-BC-1 | 200-CW-5 | 300-FF-2 |

RCRA-CERCLA Past-Practice (R-CPP) Groups

| 200-DV-1 | 200-EA-1 | 200-IS-1 | 200-SW-2 |

BASIS FOR PERMIT CONDITIONS

Owners and operators of dangerous waste TSD facilities are required to clean up pollution releases at their facilities, including releases that have migrated beyond the facility boundary, as necessary to protect human health and the environment. At the federal level, these cleanup requirements are commonly referred to as “corrective actions” and generally flow from federal statutory requirements in RCRA sections 3004(u), 3004(v) and 3005(c)(3). Like most other requirements of RCRA, responsibility for overseeing the implementation of the corrective actions is intended to be passed from the US Environmental Protection Agency (EPA) to authorized states.

When issued in 1994, the Hanford permit contained two portions. Ecology issued the portion setting requirements for operating the facility and most standards for treating, storing, and disposing dangerous
waste. EPA Region 10 issued the portion setting requirements for corrective action under the Hazardous and Solid Waste Amendments (HSWA) to RCRA and for other HSWA requirements for which Ecology was not yet authorized.

After the permit was issued in 1994, Ecology became authorized for corrective-action requirements. On March 28, 2000, the permit was modified to transfer corrective-action conditions from the federal to the state portion of the permit. However, the U.S. Department of Energy (USDOE) appealed the modification to the Washington State Pollution Control Hearings Board.

On December 8, 2000, USDOE and Ecology settled the appeal by stipulating, in general terms, that USDOE may defer to a future date its right of litigation on whether Ecology can impose corrective-action obligations on the following:

- Property subleased to US Ecology, Inc.
- CERCLA (superfund) Past Practice Units identified under the Tri-Party Agreement.
- Radionuclides regulated under the Atomic Energy Act.

**CORRECTIVE ACTION**

The Permittees must comply with Condition II.Y.2.a for corrective action at all the CPP operable units.

The Permittees must comply with Condition II.Y.2.b for corrective action at all the R-CPP operable units.

**STATE ENVIRONMENTAL POLICY ACT (SEPA)**

The SEPA determination for Corrective Action is in the Hanford-Wide Permit Fact Sheet.
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