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**FACT SHEET**  
**PART IV, CORRECTIVE ACTION 2, GROUNDWATER OPERABLE UNITS**

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1 **FACT SHEET**

2 **PART IV, CORRECTIVE ACTION 2, GROUNDWATER OPERABLE UNITS**

3 **UNIT DESCRIPTION**

4 The Tri-Party Agreement (TPA) Action Plan, [Section 3.3](#), states that “Groundwater operable units can be  
5 established where multiple sources from different operable units have contributed to the same plume.  
6 Operable units that are associated with a groundwater operable unit are referred to as source operable  
7 units. The schedule for investigation of each groundwater operable unit will coincide with the schedule  
8 for investigation of the source operable unit that is the major contributor to the plume.”

9 Plumes have generally been described in terms of areas where groundwater concentrations exceed  
10 drinking water standards for one or more contaminants. Plumes may also be defined where groundwater  
11 concentrations exceed background concentrations for one or more contaminants.

12 TPA [Appendix C](#) lists ten groundwater operable units.

13 **Groundwater Operable Units in the 100 Area**

- 14 • 100-BC-5
- 15 • 100-FR-5
- 16 • 100-HR-3
- 17 • 100-KR-4
- 18 • 100-NR-2

19 **Groundwater Operable Units in the 200 Areas**

- 20 • 200-BP-5 (200 East Area)
- 21 • 200-PO-1 (200 East Area)
- 22 • 200-UP-1 (200 West Area)
- 23 • 200-ZP-1 (200 West Area)

24 **Groundwater Operable Unit in the 300 Area**

- 25 • 300-FF-5

26 **BASIS FOR PERMIT CONDITIONS**

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

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

39 After the permit was issued in 1994, Ecology became authorized for corrective-action requirements. On  
40 March 28, 2000, the permit was modified to transfer corrective-action conditions from the federal to the

1 state portion of the permit. However, the U.S. Department of Energy (USDOE) appealed the  
2 modification to the Washington State Pollution Control Hearings Board.

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

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

9 **CORRECTIVE ACTION**

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

12 **STATE ENVIRONMENTAL POLICY ACT (SEPA)**

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

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