

3.0 Unit Identification, Classification, and Prioritization

3.1 Introduction

This section describes what constitutes a waste management unit at the Hanford Site. In addition, it describes how waste management units are classified, prioritized, and grouped for common investigation and response or corrective action.

A waste management unit represents any location within the boundary of the Hanford Site that may require action to mitigate a potential environmental impact. This would include all solid waste management units (SWMUs) as specified under Section 3004(u) of RCRA. These waste management units were previously defined in the *Hanford Site Waste Management Units Report* (see Section 3.5). Waste management units include the following:

- Waste disposal units (including RCRA disposal units)
- Unplanned release units (including those resulting from spills)
- Inactive contaminated structures
- RCRA treatment and storage units
- Other storage areas.

The parties recognize and agree that certain activities related to the stabilization and transition of facilities, before or after the shutdown decision has been made, through the final disposition of structures by DOE, are subject to RCRA, CERCLA or other regulatory controls related to the Agreement. The generation and/or discharge of (Ecology/EPA) regulated substances or wastes, including the treatment, storage and disposal of those substances or wastes, shall be subject to the requirements and schedules established pursuant to this Agreement. Appropriate specific requirements and/or Tri-Party Agreement Milestones for the completion of key activities that generate or discharge regulated substances or wastes shall be incorporated into the Action Plan. Agreed-upon key transition, surveillance and maintenance, and disposition activities not subject to Ecology/EPA regulation that are critical to cleanup may be established as target dates. The goal is to conduct regulated and nonregulated work in an orderly sequence to insure coordination with other cleanup actions. Section 8.0 defines the process for identification of key Hanford facilities, and the subsequent process for conducting their transition, surveillance and maintenance, and/or disposition. Facilities which are fully dispositioned under the RCRA closure process (see Section 3.2), or are dispositioned in conjunction with an operable unit cleanup (see Section 3.3), are not addressed under Section 8.0. DOE will enter into negotiations for transition or disposition of key facilities within three months of a shutdown notice or decision to proceed with disposition, respectively. Such negotiations will be completed within 6 months from initiation. If they are not, any party may initiate dispute resolution in accordance with this Agreement.

In the event that a contaminated structure is found to be the source of a release (or presents a substantial threat of a release) of hazardous substances, hazardous wastes, or hazardous constituents to the environment, the investigation and remediation of such a release (to include remediation of structures, as necessary), where subject to CERCLA or RCRA, shall be subject to this Agreement. Specific requirements shall be incorporated into the Action Plan as appropriate. Releases which have already been identified have been included in the Action Plan as waste management units and assigned to operable units (see Appendix C) and have been included in the Waste Information Data System (WIDS).

As part of any action being taken under either RCRA or CERCLA for a contaminated structure, EPA and Ecology shall consider available information related to decommissioning activities, including environmental impact statements. All hazardous wastes generated by the decommissioning activities or stored at these storage areas shall be managed in accordance with applicable Federal and State hazardous waste regulations.

3.2 Treatment, Storage, and Disposal Units

Treatment, storage, and disposal units are those units which will be permitted (for operation and/or postclosure care) and/or closed, under the Washington State Dangerous Waste Regulations (173 303 WAC) and the applicable provisions of HSWA. Appendix B provides a current listing of these units, or group of units (with individual units defined); identifies whether the TSD group/unit will be permitted for operation or closed; and identifies the assigned operable unit, if applicable. A TSD group represents a combination of units that are combined for purposes of preparing a permit application or closure plan. The schedule of permitting activities or closures will be established by Ecology in cooperation with the EPA and DOE. Some TSD groups/units, primarily land disposal units, are included within operable units (see Section 3.3 below) and will be addressed concurrently with past-practice activities as defined in Section 5.5. A further discussion of TSD groups/units is provided in Section 6.0.

3.3 Past-Practice Units

A past-practice unit is a waste management unit where wastes or substances (intentionally or unintentionally) have been disposed and that is not subject to regulation as a TSD unit as specified in Section 3.2.

Due to the relatively large number of past-practice units at the Hanford Site, a process has been established for organizing these units into groups called operable units. The concept of operable units is to group the numerous units (primarily by geographic area) into manageable components for investigation and response action and to prioritize the cleanup work to be done at the Site.

The WIDS (see Section 3.5) contains information on waste management units that was used to support the development of operable units. This information, combined with operable unit identification and prioritization criteria described in this section, resulted in the designation of operable units across the Hanford Site (see Appendix C). Each of the operable units will be subject to an investigation in the form of either a CERCLA or a RCRA-CERCLA past-practice

process as described in Sections 7.3 and 7.4, respectively. Appendix C includes a list of all the past-practice units on the Hanford Site by operable unit. In addition, current listings of all past-practice units on the Hanford Site are maintained electronically in the WIDS.

Some TSD units, primarily land disposal units, will be investigated and managed in conjunction with past-practice units and have been assigned to appropriate operable units (see Appendix B for current assignment of TSD groups/units to operable units).¹ The information necessary for performing RCRA closures within an operable unit will be provided in coordination with various past-practice documents pursuant to Section 5.5. These documents will include a coordinated past practice site investigation/RCRA closure/RCRA corrective action approach in order to efficiently implement applicable regulations. Those TSD units not assigned to an operable unit are typically treatment or storage units that are likely to be “clean closed” as described in Section 6.3.1.

Individual past-practice units (and selected TSD units) have been assigned to a specific operable unit based on the following criteria:

- General patterns of waste disposal from specific process sources
- Spatial relationship to other waste units
- Contribution to the same groundwater contaminant plume
- Physical characteristics of area (e.g., geologic/hydrogeologic)
- Access considerations (e.g., buildings, buried pipes)
- Anticipation of similar remedial action strategy (economy of scale)
- Reasonable number of total units to effectively manage.

In addition to the operable units discussed above, groundwater operable units can be established where multiple sources from different operable units have contributed to the same plume. Operable units that are associated with a groundwater operable unit are referred to as source operable units. The schedule for investigation of each groundwater operable unit will coincide with the schedule for investigation of the source operable unit that is the major contributor to the plume. Other associated source operable units that are lower priority will be investigated at a later time, in accordance with the established criteria for prioritization of operable units.

¹ These TSD units have been assigned to appropriate operable units for the sole purpose of coordinating the development and implementation of closure plans for such TSD units with the investigation and remediation of closely associated past-practice units, in accordance with the process described in Action Plan Section 5.5. These assignments are purely administrative in nature and do not in and of themselves subject any TSD unit to the CERCLA decision-making process.

3.4 Prioritization

This section describes the bases for prioritizing operable units and those TSD groups/units that are not included within operable units.

3.4.1 Prioritization of Operable Units

Operable units are prioritized based on an initial assessment of risk potential to ensure that action is focused on the greater hazard. Criteria for evaluating and remediating potential hazards include the following information:

- Volume of wastes or hazardous substances
- Hazardous substances identification and concentration
- Toxicity or health effects of the hazardous substances
- Potential for migration to receptors via all environmental pathways.

In addition, the following factors are used to determine priority:

- Available technology to investigate or remediate the operable unit
- Operation consideration (e.g., timing of decommissioning activities)
- Consideration to those operable units that include TSD units.

Based on criteria listed above, and to focus resources on waste sites near the river, the operable units in the 100 and 300 Area have been given high priority and investigations are nearing completion. The first six operable units to be investigated in the 200 Area have been determined based on the criteria listed above. Subsequent 200 Area operable units will be prioritized based on the above criteria as well as on information gained during the initial investigations. Prioritization of investigations of 200 Area operable units is outlined in the work schedule located in Appendix D. Closure of the single-shell tanks is not addressed under the past-practice process and will be addressed under the RCRA closure program (see Appendix B).

3.4.2 Prioritization of Treatment, Storage, and Disposal Units

All TSD groups/units are subject to a permitting and/or closure process described in Section 6.0. Those TSD groups/units assigned to an operable unit will be prioritized in conjunction with past-practice priorities for purposes of investigation. The order in which permit applications or closure plans will be developed for the remaining TSD groups/units is based on consideration of the following criteria.

- **Environmental Risk**. The risk to public health and environment is the most important consideration. Any action that will significantly reduce the risk to public health and/or the environment will be considered the highest priority.

- **Waste Minimization.** Waste minimization is central to the goal of reducing environmental risks and bringing about environmental compliance for continuing operations and for new units at the Hanford Site. Therefore, the parties agree that Ecology’s “Priority Waste Management Policy” (Ecology 86-07), established pursuant to CH. 70.105.150 RCW, shall be adhered to as guidance for purposes of establishing permitting priorities, in addition to evaluating proposed changes in operational procedures, and for the development and implementation of new waste management strategies. This policy defines the following prioritized actions: (1) waste reduction, (2) recycling, (3) treatment, (4) stabilization, and (5) land disposal.
- **Permit Application Dates Required by Law.** The *Hazardous and Solid Waste Amendments of 1984* (HSWA) mandated dates for submittal of Part B permit applications. The dates for submitting dangerous waste (excluding mixed waste units) Part B permit applications were as follows:
 - Land disposal units: November 8, 1985
(all required Part B applications were submitted prior to this date)
 - Incineration units: November 8, 1986
(not applicable for the Hanford Site)
 - Treatment and storage units: November 8, 1988.

Part A permit applications for all mixed waste units that will be operating under interim status were due by May 23, 1988 (this date was met for all such known units). Part B permit applications for the disposal of mixed waste to land disposal units were due by November 23, 1988 (this date was met for all such known units), including the certification statement required by Section 3005(e)(2) of RCRA, that the unit is in compliance with the interim status groundwater monitoring requirements. There are no statutory Part B permit application dates for mixed waste treatment and storage units.

- **Operational Requirements.** Some operational considerations are important for maintaining or achieving environmental compliance, continuation of Hanford Site operations, or achieving cleanup in a cost effective manner. Examples of such operational considerations include permitting a treatment unit for operation or accelerating closure actions to complement decontamination and decommissioning of related structures.

3.5 Waste Information Data System/Waste Management Unit Report

The Waste Information Data System (WIDS) is the electronic database of waste site information for the Hanford Site. The WIDS identifies all waste management units on the Hanford Site, and describes the current status of each unit (e.g., active/inactive, TSD, CERCLA past-practice or RCRA-CERCLA past-practice), and includes other descriptive information (e.g., location, waste types.) The system is maintained by the DOE in accordance with the WIDS

change control system, which documents and traces all additions, deletions and/or other changes dealing with the status of waste management units.

The information in WIDS reflects Appendix C, which contains the official list of waste sites and/or releases which require remedial investigation or action under § 120 of CERCLA.

The Hanford Site Waste Management Units Report shall be generated, in a format agreed upon by the Parties, as a calendar year report and issued annually by the DOE by the end of February of each year, and posted electronically for regulator and public access. This report shall reflect all changes made in waste management unit status during the previous year.