

**Non-Significant Change for the 100-DR-1, 100-DR-2, 100-HR-1, 100-HR-2, 100-HR-3 Operable Units
Record of Decision, Hanford Site, July 2018**

**Memo to File Regarding: Clarification of the Modular Storage Units as On-Site for the Purposes of
Purgewater Management for Final Remedial Actions**

This memorandum serves to document the determination that the Modular Storage Units (MSUs) located immediately northeast of the 200 East Area of the Hanford Site (see Figure 1) are considered on-site for remedial actions for the 100-DR-1, 100-DR-2, 100-HR-1, 100-HR-2, and 100-HR-3 Operable Units (OUs) Record of Decision (ROD). The preamble to the NCP (55 FR 8666) states that when noncontiguous facilities are reasonably close to one another and wastes at these sites are compatible for a selected treatment or disposal approach, CERCLA Section 104(d)(4), "Response Authorities", allows the lead agency to treat these related facilities as one site for response purposes and, therefore, allows the lead agency to manage waste transferred between such noncontiguous facilities without having to obtain a permit. The statutory criteria for this consideration are relationship either on basis of geography or basis of threat posed. The preamble identifies that waste treatment compatibility is one measure of relationship on basis of threat posed. Purgewater from these OUs has been historically managed at the MSUs, has similar contaminants to purgewater managed at the MSUs, and is an acceptable waste stream for the MSUs in DOE/RL-2009-80, *Investigation Derived Waste Purgewater Management Work Plan*. Further, the MSUs are located in the same geographic proximity as other noncontiguous facilities considered to be on-site under the ROD. Therefore, the OUs and the MSUs are considered to be a single site for response purposes.

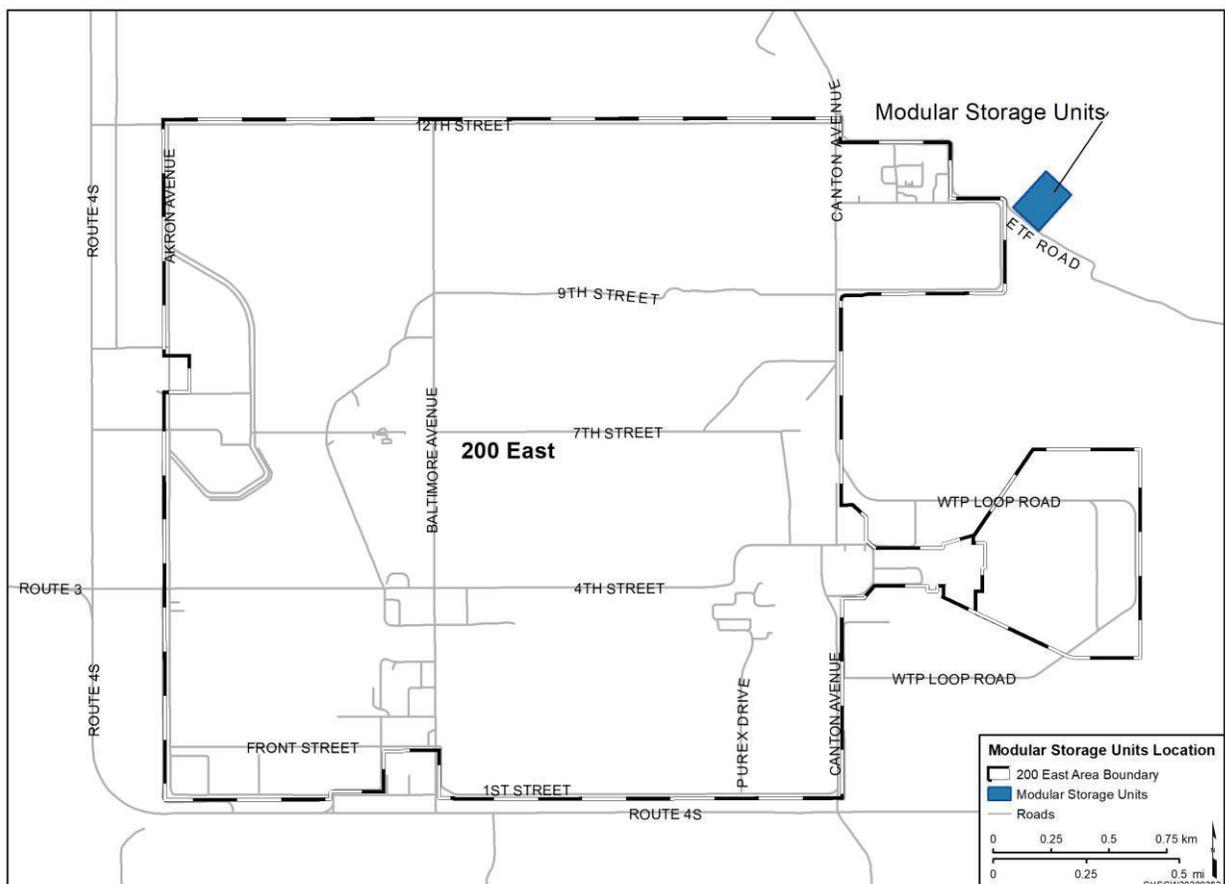


Figure 1. MSUs Location Map.

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Purgewater generated as part of the Hanford Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) 100-DR-1, 100-DR-2, 100-HR-1, 100-HR-2, and 100-HR-3 OUs remedial actions will be managed at the MSUs. Purgewater is groundwater withdrawn from Hanford Site wells for (1) developing newly constructed groundwater monitoring wells, (2) purging existing wells prior to sample collection, (3) aquifer testing, (4) periodic cleaning and renovating existing monitoring wells, and (5) abandoning existing wells. Only purgewater generated at the Hanford Site is authorized for management at the MSUs, and purgewater generated off the Hanford Site is not authorized for management at the MSUs. Purgewater generated as part of the Remedial Investigation/Feasibility Study (RI/FS) for the 100-DR-1, 100-DR-2, 100-HR-1, 100-HR-2, and 100-HR-3 OUs ROD has been sent to the MSUs for management, and purgewater management at the MSUs was expected to continue after the issuance of the ROD. Determination of the MSUs as on-site for management purposes, however, was not explicitly stated in the ROD for these OUs. This change is intended to clarify that the MSUs are considered to be on-site for the purposes of purgewater management for these remedial actions only.

Purgewater has been managed at the MSUs for approximately 10 years, through the Non-Time Critical Removal Action documented in DOE/RL-2009-39, *Investigation-Derived Waste Purgewater Management Action Memorandum* (Action Memo). The MSUs were designed and constructed for the management of purgewater and are protective of human health and the environment. Pursuant to the Action Memo for the 2009 Non-Time Critical Removal Action, use of the MSUs has been carefully considered in respects to safety and protection of the environment in compliance with applicable or relevant and appropriate requirements documented in Appendix A of the Action Memo. Under this change, purgewater would continue to be managed at the MSUs, and no modification to the MSUs is required.

This modification to the aforementioned ROD is considered to be a non-significant change for the following reasons:

- Purgewater across the Hanford Site is currently managed at the MSUs, and was intended to be managed at the MSUs after issuance of final RODs;
- Purgewater was managed throughout the RI/FS process at the MSUs;
- An evaluation of purgewater management at the MSUs was previously performed and documented in DOE/RL-2009-31, *Investigation Derived Waste Purgewater Management Engineering Evaluation/Cost Analysis*;
- Clarification of the authorization to ship purgewater from the Operable Units to the MSUs for treatment does not significantly affect the scope, performance, or cost of any of the relevant remedial actions;
- There will be no impact to cost or schedule for any current Operable Unit remedial action.

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