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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

October 12, 2001

MEMORANDUM

SUBJECT: Handbook of Groundwater Protection and Cleanup Policies for RCRA Corrective Action (final version)

FROM: Elizabeth A. Cotsworth, Director /s/
Office of Solid Waste

TO: RCRA Regional Senior Policy Advisors, State Directors, and Interested Members of the Regulated Community and the Public

Attached is the final version of the Handbook of Groundwater Protection and Cleanup Policies for RCRA Corrective Action. The Office of Solid Waste, in partnership with EPA Region III's Waste and Chemicals Management Division, developed this Handbook as part of the RCRA Cleanup Reforms efforts that EPA announced in July 1999 and January 2001. The primary objectives of these reforms are to promote faster, focused and more flexible cleanups, and foster creative solutions to improve program implementation. EPA's goal for this Handbook is that it will help meet these objectives by reducing time-consuming uncertainties and confusion about EPA's current policies concerning groundwater protection and cleanup at RCRA facilities.

Stakeholders should view the policies in this Handbook as a guide for how EPA would generally implement RCRA corrective action. However, since most states and territories are authorized to carry out facility-wide RCRA corrective action in lieu of EPA, users of the Handbook should be aware of applicable state requirements and guidance prior to conducting investigations and cleanups.

In general, stakeholders have been supportive of the purpose and format of the Handbook. Here is how this final version responds to some of the major comments we received on the draft document we issued for public comment in May 2000.

- The Handbook now includes a Groundwater Protection and Cleanup Strategy conveying EPA's overall goals and approaches for dealing with contaminated groundwater at RCRA facilities, and serving as a common focus for other policies addressed in the Handbook. For example, the Strategy emphasizes EPA's long-standing general expectation that final cleanups return usable groundwater to its maximum beneficial use where practicable. However, the Strategy also conveys that using meaningful and measurable short-term and intermediate goals (where appropriate) often make sense as part of an overall phased approach to address contaminated groundwater.

- The Handbook now describes how a different “point of compliance” for groundwater cleanups might be appropriate depending on the particular goal (short-term, intermediate, or final) a facility and the overseeing regulator are pursuing.
- The Handbook clearly conveys the need for facilities to control sources (using treatment technologies for “principal threats”) so as to reduce or eliminate, to the extent practicable, further releases of hazardous waste or hazardous constituents that may pose a threat to human health and the environment.
- Consistent with EPA’s long-standing policies, the Handbook continues to recognize that there can be various uses and purposes of groundwater, and that regulators and facilities should consider these uses and purposes (and associated exposures), as appropriate, in implementing facility-specific corrective action. However, the Handbook recognizes that most states identify the majority of their groundwaters as actual or potential sources of drinking water, and therefore have their own requirements and policies aimed at cleaning up contaminated groundwater so that it will be suitable for drinking water purposes.

This final version of the Handbook is available for immediate use by all stakeholders. However, it is important to recognize that issuing this Handbook does not foreclose further discussion concerning groundwater polices for the RCRA Corrective Action Program. On the contrary, we hope this Handbook will spur new dialogues that will lead to improvements in groundwater protection and cleanup in general. Furthermore, we recognize that continued dialogue on these important topics could result in changes to the policies in this Handbook. So, we intend to revise the document as needed to help ensure that it reflects current Agency positions.

To help make the Handbook a useful resource, we designed it with numerous internal and external “hyperlinks” to help you navigate within the document and to take you directly to more detailed resources and guidance documents. Therefore, if you are reading a paper copy of this Handbook, we urge you to access an electronic version (<http://www.epa.gov/correctiveaction>) so you can take full advantage of the “hyperlinks” feature and to make sure you are reading the most current version. To access the electronic version, you will need a recent version of Adobe reader, which is available for free at <http://www.adobe.com/products/acrobat/readstep2.html>. Furthermore, we recommend that you have your web-browser open to allow the hyperlinks to easily access resources available through the World Wide Web.

You should direct questions concerning this Handbook to Guy Tomassoni who can be reached at 703/308-8622. Furthermore, we welcome public comment on this Handbook at any time and will consider those comments in any future revisions. Also, to help us maintain the Internet links in the Handbook, please let us know if any of the links do not connect you to the identified Web site or document. You can submit electronic comments to Guy at tomassoni.guy@epa.gov or your written comments to: Guy Tomassoni (mail code 5303W), USEPA, Corrective Action Programs Branch, Ariel Rios Building, 1200 Pennsylvania Avenue, Washington, DC 20460.

Attachment