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GROUNDWATER MONITORING AT REGULATED UNITS NEAR SWMUs THAT  
HAVE IMPACTED GROUNDWATER

June 17, 1987

MEMORANDUM

SUBJECT: Ground-Water Monitoring at Regulated Units Near SWMUs  
That Have Impacted Ground-Water

FROM: Marcia E. Williams, Director  
Office of Solid Waste (WH-562)

Gene A. Lucero, Director  
Office of Waste Programs Enforcement (WH-527)

TO: Robert Duprey, Director  
Waste Management Division  
Region VIII

We are responding to your memorandum of March 19, 1987, on the above subject. Your inquiry has raised several good questions. Situations in which either the background ground-water quality at a regulated unit is highly contaminated or the regulated unit is constructed on an old solid waste management unit (SWMU) that has affected ground water are common. Your memorandum contained a series of questions but did not include sufficient detail for us to specifically respond to each question for each site. Instead, we offer a general approach for each site, to which you may apply site-specific considerations.

In the case of the refinery which has an interim status land treatment area downgradient of an unlined, non-regulated surface impoundment, you may issue a permit, if the following conditions are satisfied:

The land treatment unit is in compliance with applicable land treatment requirements, including those involving unsaturated zone monitoring (especially soil care monitoring);

The unsaturated zone monitoring indicates that there has been no migration of hazardous constituents from

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the treatment zone;

Upgradient ground-water monitoring well(s) are not affected by the land treatment unit (a showing by soil core monitoring that there has been no migration would be an important indication that the upgradient well(s) are unaffected by the regulated unit); and

Ground-water contamination is being addressed through HSWA corrective action provisions (either §3004(u) or §3008(h)).

In the case where the regulated unit is an interim status landfill that is constructed on a SWMU, you may issue a permit, if the following conditions are satisfied:

Upgradient ground-water monitoring well(s) are not affected by the regulated landfill (this will probably require use of background wells upgradient of the SWMU, because of the apparent stability to determine whether contamination is from the landfill or the SWMU);

Downgradient ground-water monitoring wells represent the quality of ground water passing the point of compliance (this approach assumes for regulatory purposes that all releases are from the regulated unit); and

Ground-water contamination is being addressed through HSWA corrective action provisions and §264.100 (the permit could include a reopener clause to modify the ground-water standard if the corrective action is able to clean up the contamination).

In both of these cases, we would like to emphasize the importance of dealing with the ground-water contamination problem at the sites. Corrective action for these releases is the critical element of any site strategy.

For further guidance on the subject of various regulatory requirements of ground-water monitoring, we would refer you to the RCRA Ground-Water Monitoring Compliance Order Guidance (Final - August 1985).

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We appreciate the opportunity to be of assistance to you.  
If you have any further questions, please contact Suzanne  
Rudzinski at (FTS) 382-4206 or Ken Jennings at (FTS) 475-9874.

cc: Bruce Weddle  
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