Documentation of Environmental Indicator Determination RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name:	Tecnal (aka Northwest Petrochemical Corporation)
Facility Address:	708 N Texas Rd, Anacortes, WA
Facility EPA ID #:	WAD 00962 4347

- 1. Has **all** available relevant/significant information on known and <u>reasonably suspected</u> releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?
 - **___X** If yes check here and continue with #2 below.
 - _____ If no re-evaluate existing data, or
 - If data are not available skip to #6 and enter"IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**¹ above appropriately protective risk-based "levels" (applicable promulgated standards, well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	<u>No</u>	?	Rationale / Key Contaminants
Groundwater	_X			Benzene, Toluene,2,4-dimethylphenol, o-cresol, m&p-cresol, phenol, naphthalene, cyanide chromium
Air (indoors) ² Surface Soil (e.g., <2 ft) Surface Water	_x_	_X _X		PAHs
Sediment Subsurf. Soil (e.g., >2 ft) Air (outdoors)	_x_	_x 		PAHs

- If no (for all media) skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.
- _____x___ If yes (for any media) continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s): Groundwater data from 2002 and 2003 show that benzene, toluene, 2,4dimethyl phenol, cresols, naphthalene, phenol, and chromium exceed the Washington state Model Toxics Control Act (MTCA) level B values, which are the state human-health based standards for residential (unrestricted) use.

Soil data from 2002 show that benzo(a)anthracene, benzo(b)fluoranthene, and chrysene exceed MTCA C (industrial) levels at some surface and sub-surface locations. In addition, benzo(a)pyrene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene, and 3,3'- dichlorobenzidine exceed MTCA B levels.

Arsenic was detected in ground water and was evaluated as a contaminant of concern (COC). Arsenic data collected by Shell Oil show that concentrations of arsenic in the groundwater at the facility are within background concentrations for March Point and below the concentration established as background for the state of Washington under MTCA (5 micrograms per liter). Based on this information, arsenic was determined not to be a COC.

References:

Golder Associates *Technical Memorandum 02-01 Soil Investigation Results* October 17, 2002 Golder Associates *Technical Memorandum 02-02 Groundwater Investigation Results* November 13, 2002 Golder Associates 1/2003, 4/2003, 1/2004, 10/2004, and 5/2005 groundwater sampling data

Notes:

¹ "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile

contaminants) does not present unacceptable risks.

Are there complete pathways between "contamination" (verified or reasonably suspected) and human 3. receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential Human Receptors (Under Current Conditions)

"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater	_no	_no	_no	_yes			_no_
Air (indoors)							
Soil (surface, e.g., <2 ft)	_no	_no	_no	_yes	_yes_	_no_	_no_
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)				_yes			no
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated") as identified in #2 above.

2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("____"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

- If no (pathways are not complete for any contaminated media-receptor combination) skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) inplace, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).
- If yes (pathways are complete for any "Contaminated" Media Human Receptor _X___ combination) - continue after providing supporting explanation.
 - If unknown (for any "Contaminated" Media Human Receptor combination) skip to #6 and enter "IN" status code

Rationale and Reference(s):

The company that currently owns the property has ceased operation and, except for a small office building, all structures on site have been demolished. The site is fenced and there are no workers on site. A fence is in place to deter unauthorized access, however, a trespasser could be exposed to surface soil contamination. At the point at which the property is sold, construction crews and future workers could be exposed to groundwater and surface and sub-surface soil contamination.

There is currently no exposure pathway to residents through drinking water. There are no drinking water wells downgradient from the facility and none are planned. The aquifer is of marginal quality, with high total dissolved solids. An evaluation will be done to determine the appropriate beneficial use for the aquifer and

what measures, if any, need to be taken in the long term to ensure that there remains no complete pathway.

The potential for a complete pathway through consumption of seafood was evaluated and found not to be "significant", as defined in question 4. It is not currently known if the aquifer or the groundwater plume are hydrologically connected with Padilla Bay. However, even if there is a connection between the plume and the Bay, it is unlikely that unacceptable human health risks exist for the following reasons:

The organic contaminants in the plume and cyanide do not bioaccumulate and would therefore not pose a human health risk.

Chromium was evaluated as a potential COC for the facility because total chromium concentrations in at MW-8 were in the range of 8.92 – 20.1 ug/l, which exceeds background concentrations for March Point. In determining whether chromium is in fact a COC, the valence state must be considered. The bioaccumulative potential for chromium is dependent upon the valence state: hexavalent chromium bioaccumulates in fish tissue, but trivalent chromium does not. In May 2005, the facility analyzed for both trivalent and hexavalent chromium. The samples were non detect for hexavalent chromium and attempts to spike the samples with hexavalent chromium for quality assurance purposes showed that the chromium was almost immediately reduced by the samples to the trivalent form. Therefore, EPA has determined that most, if not all, of the chromium in the ground water most likely exists in the trivalent form and is not likely to bioaccumulate.

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

- 4 Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant**^{#4} (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?
 - **x** If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."
 - If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and Reference(s):

Soil data show that benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(b)fluoranthene, chrysene, dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene exceed MTCA C (industrial) levels at some surface and sub-surface locations. However, as discussed above there are no currently workers on site and the site is fenced to control access. Construction workers could be exposed to these contaminants. However, at this time, there are no plans for construction and the contamination will be addressed prior to any construction.

⁴ If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

- 5 Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?
 - If yes (all "significant" exposures have been shown to be within acceptable limits) continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).
 - _____ If no (there are current exposures that can be reasonably expected to be "unacceptable")continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.
 - _____ If unknown (for any potentially "unacceptable" exposure) continue and enter "IN" status code

Rationale and Reference(s):

6.	Check the appropriate RCRIS status codes for the Current Human Exposures Under
	Control EI event code (CA725), and obtain Supervisor (or appropriate Manager)
	signature and date on the EI determination below (and attach appropriate supporting
	documentation as well as a map of the facility):

X	YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a
	review of the information contained in this EI Determination, "Current Human
	Exposures" are expected to be "Under Control" under current and reasonably expected
	conditions. This determination will be re-evaluated when the Agency/State becomes
	aware of significant changes at the facility.

- _____ NO "Current Human Exposures" are NOT "Under Control."
- IN More information is needed to make a determination.

Completed by	(signature)	Date8/2/05			
	<u>Carla Fisher</u>				
	Environmental Engineer				
Supervisor	(signature)	Date			
	Richard Albright				
	Director, Office of Waste and Chemicals Management				
	EPA R10				

Narrative including locations where References may be found:

Contact telephone and e-mail numbers

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FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750)

Facility Name:	Tecnal (aka Northwest Petrochemical Corporation)
Facility Address:	708 N Texas Rd, Anacortes, WA
Facility EPA ID #:	WAD 00962 4347

 Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

__X__ If yes - check here and continue with #2 below.

_____ If no - re-evaluate existing data, or

if data are not available, skip to #8 and enter"IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Page 2

- 2. Is **groundwater** known or reasonably suspected to be **"contaminated"**¹ above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?
 - **__x**__ If yes continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.
 - If no skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."
 - _____ If unknown skip to #8 and enter "IN" status code.

Rationale and Reference(s): Groundwater data from 2002 through 2006 show that benzene, toluene, 2,4-dimethylphenol, cresols, naphthalene, phenol, arsenic and chromium exceed the Washington state Model Toxics Control Act (MTCA) level B values, which are the state human-health based standards for residential (unrestricted) use.

References:

Golder Associates *Technical Memorandum 02-02 Groundwater Investigation Results* November 13, 2002 Golder Associates 1/2003, 4/2003, 1/2004, 10/2004, 5/2005 8/2005, 12/2005 and 4/2006 groundwater sampling data

Golder Associates Technical Memorandum 2006-01 Padilla Bay Geophysical Investigation Results March 20, 2006

Notes: ¹"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

Page 3

- 3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"² as defined by the monitoring locations designated at the time of this determination)?
 - ____x___ If yes continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"²).
 - If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"²) skip to #8 and enter "NO" status code, after providing an explanation.
 - _____ If unknown skip to #8 and enter "IN" status code.

Rationale and Reference(s)_____A review of data over the last 2 years shows that concentrations of contaminants of concern (COCs) appear to be stable at monitoring wells. Golder Associates conducted a geophysical study of Padilla Bay in November and December 2005 that showed that there is a confining layer under the Bay that prevents COCs from reaching surface water.

Golder Associates 1/2003, 4/2003, 1/2004, 10/2004, 5/2005 8/2005, 12/2005 and 4/2006 groundwater sampling data

Golder Associates Technical Memorandum 2006-01 Padilla Bay Geophysical Investigation Results March 20, 2006

² "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

Page 4

- 4. Does "contaminated" groundwater **discharge** into **surface water** bodies?
 - _____ If yes continue after identifying potentially affected surface water bodies.
 - **x**____ If no skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
 - _____ If unknown skip to #8 and enter "IN" status code.

Rationale and Reference(s):___ Golder Associates conducted a geophysical study of Padilla Bay in November and December 2005 that showed that there is a confining layer under the Bay that prevents COCs from reaching surface water.

Golder Associates Technical Memorandum 2006-01 Padilla Bay Geophysical Investigation Results March 20, 2006



Page 5

- 5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?
 - If yes skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of <u>key</u> contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.
 - If no (the discharge of "contaminated" groundwater into surface water is potentially significant) continue after documenting: 1) the maximum known or reasonably suspected concentration³ of <u>each</u> contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³ greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):_____

³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

Page 6

- 6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?
 - If yes continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR

2) providing or referencing an interim-assessment,⁵ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):_____

⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

Page 7

- 7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"
 - **__x__** If yes continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."
 - _____ If no enter "NO" status code in #8.
 - _____ If unknown enter "IN" status code in #8.

Rationale and Reference(s):__the Facility will continue with semi-annual monitoring for COCs at downgradient wells pursuant to Consent Order 1087-10-19-3008



Page 8

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

X	YE - Yes, "Migration of Contaminated Groundwater Under Control" has been
	verified. Based on a review of the information contained in this EI
	determination, it has been determined that the "Migration of Contaminated
	Groundwater" is "Under Control". Specifically, this determination indicates that
	the migration of "contaminated" groundwater is under control, and that
	monitoring will be conducted to confirm that contaminated groundwater remains
	within the "existing area of contaminated groundwater" This determination will
	be re-evaluated when the Agency becomes aware of significant changes at the
	facility.

_____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

Completed by	/s/	Date _	8/23/06
	Carla Fisher		
	Environmental Engineer		
a .			0.00.00
Supervisor	/ <u>S</u> /	Date _	_8/28/06
	Richard Albright		
	Director, Office of Waste and Chemicals Manageme	nt	
	EPA R10		

Narrative including locations where References may be found:

Contact telephone and e-mail numbers

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206 553-1756	
fisher.carla@epa.gov	