

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRAInfo code (CA725)**

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DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action

Current Human Exposures Under Control

Facility Name: B. S. B. Diversified Company, Inc.
Facility Address: 8202 South 200th Street, Kent, Washington 98032
Facility EPA ID #: WAD 07 665 5182

1. Has all available relevant/significant information on known and reasonably suspected 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 RCRAInfo national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

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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, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

Media	Yes	No	?	Rationale / Key Contaminants
Groundwater	X			Existing groundwater plume present > MTCA levels
Air (indoors) ²		X		Vacant lot; no buildings; paved site
Surface soil (e.g., <2 feet)	X			Existing analytical data.
Surface water		X		NA
Sediment		X		NA
Subsurface soil (e.g., >2 feet)	X			Existing soil analytical data > MTCA levels
Air (outdoors)		X		Vacant lot; no buildings; paved site

_____ 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): _____

Rationale

Soil and groundwater are contaminated with chlorinated solvents (TCE). Existing site investigation work, on going groundwater quality monitoring, and soil & groundwater sampling analytical data document soil and groundwater contamination.

Reference

BSB Diversified Company, Inc.; FOCUSED REMEDIAL INVESTIGATION SUMMARY/FEASIBILITY STUDY REPORT BSB PROPERTY; KENT, WASHINGTON; DECEMBER 5, 2005; PES Environmental.

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) suggests 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.

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3. Are there **complete pathways** between “contamination” and human 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	Daycare	Construction	Trespassers	Recreation	Food ³
Groundwater	<u>NO</u>	<u>YES</u>	<u>NO</u>	<u>YES</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>
Air (indoors)	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
Surface soil (e.g., <2 feet)	<u>NO</u>	<u>YES</u>	<u>NO</u>	<u>YES</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>
Surface water → NA	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
Sediment → NA	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>
Subsurface soil (e.g., >2 feet)	<u>NO</u>	<u>YES</u>	<u>NO</u>	<u>YES</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>
Air (outdoors)	<u>NO</u>	<u>YES</u>	<u>NO</u>	<u>YES</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>

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 – Potential 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) in-place, 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).

 X If yes (pathways are complete for any “Contaminated” Media - Human Receptor 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): _____

Rationale

Subsurface chlorinated solvent contamination present in the soil and groundwater at the property. The final clean up remedy involves excavation, dewatering, construction of a zero-valent-iron reactor vessel, installation of a bentonite/soil containment wall and associated subsurface utility work. Chemicals in the groundwater, soil and soil gas will be present during construction work. Complete pathways will exist for construction workers and potential trespassers during construction work.

Reference

BSB Diversified Company, Inc.; FOCUSED REMEDIAL INVESTIGATION SUMMARY/FEASIBILITY STUDY REPORT BSB PROPERTY; KENT, WASHINGTON; DECEMBER 5, 2005; PES Environmental.

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

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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)?

_____ If no (exposures cannot 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.”

 X 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): _____

Rationale

Subsurface chlorinated solvent contamination is present in the soil and groundwater at the property above acceptable risk based cleanup standards (MTCA B levels). The construction work for the final cleanup remedy will expose workers (and possible trespassers) to the chemicals in the groundwater, soil and soil gas above acceptable risk based levels during construction work.

Reference

BSB Diversified Company, Inc.; FOCUSED REMEDIAL INVESTIGATION SUMMARY/FEASIBILITY STUDY REPORT BSB PROPERTY; KENT, WASHINGTON; DECEMBER 5, 2005; PES Environmental.

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.

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5 Can the "significant" exposures (identified in #4) be shown to be within acceptable limits?

 X 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): _____

Rationale

Worker Health & Safety Plan for the construction work to address potential construction worker exposure to subsurface chlorinated solvent contamination present in the soil and groundwater at the property above acceptable risk based cleanup standards (MTCA B levels). Institutional controls (e.g., locked and fenced perimeter around the construction site) designed to prevent trespassers during the construction work.

Reference

BSB Diversified Company, Inc.; FOCUSED REMEDIAL INVESTIGATION SUMMARY/FEASIBILITY STUDY REPORT BSB PROPERTY; KENT, WASHINGTON; DECEMBER 5, 2005; PES Environmental.

B.S.B. Diversified Company, Inc.; INTERIM CORRECTIVE ACTION AND POSTCLOSURE MONITORING AND IMPLEMENTATION PLAN; BSB PROPERTY; KENT, WASHINGTON; JUNE 20, 2005; PES Environmental.

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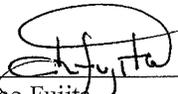
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6. Check the appropriate RCRAInfo status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation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

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" at the **B. S. B. Diversified Company, Inc.** facility, EPA ID # **WAD 07 665 5182**, located at **8202 South 200th Street, Kent, Washington 98032** 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)  Date 8/5/09
(print) Hideo Fujita
(title) Environmental Engineer

Supervisor (signature)  Date 8/5/09
(print) Julie A. Sellick
(title) Supervisor, HWTRP/NWRO
(EPA Region or State) Washington

Locations where References may be found:

Washington State Department of Ecology
Northwest Regional Office
(Sally Perkins, Public Disclosure Coordinator)
3190 - 160th AV SE; Bellevue, WA 98008-5452
phone: 425-649-7190; facsimile: 425-649-4450

Contact telephone and e-mail numbers

Hideo Fujita
425-649-7068
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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.

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

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DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action

Migration of Contaminated Groundwater Under Control

Facility Name: B. S. B. Diversified Company, Inc.
Facility Address: 8202 South 200th Street, Kent, Washington 98032
Facility EPA ID #: WAD 07 665 5182

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

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

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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").

 If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination") - 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):

Rationale

A hydraulic barrier contains the contaminated groundwater plume at the BSB property. A groundwater extraction system is currently in operation (until construction and installation of the final cleanup remedy of a bentonite/soil barrier wall) consists of six groundwater recovery wells creates a hydraulic barrier in the shallow aquifer. Recovery wells HYR-1 and HYR-2 are located on the BSB parcel and recovery wells CG-1, CG-2, CG-3, and CG-4 are located on a downgradient adjacent property. An automated control system controls pumping rates, signals system alarms, records pumping volumes and rates, and collects water level data.

This groundwater extraction system discharges effluent water directly to the publicly-owned treatment works. The extracted groundwater enters a bypass line that transfers the water from the treatment area directly to the King County sewer treatment system.

Reference

BSB Diversified Company, Inc.; FOCUSED REMEDIAL INVESTIGATION SUMMARY/FEASIBILITY STUDY REPORT BSB PROPERTY; KENT, WASHINGTON; DECEMBER 5, 2005; PES Environmental.

PERMITTEE: B.S.B. Diversified Company, Inc.; I.D. Number: WAD 07 665 5182; STATE OF WASHINGTON DANGEROUS WASTE MANAGEMENT PERMIT FOR REMEDIAL (CORRECTIVE) ACTION

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.

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)

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): _____

Rationale

A downgradient area investigation was initiated to confirm capture of impacted groundwater in the area. Six monitoring wells were installed on the east side of 84th Avenue South. Low-level volatile organic compounds were detected in the monitoring wells east of 84th Avenue South; however, the hydrogeologic analysis indicates the current groundwater plume is located within the capture zone induced by the groundwater extraction wells.

Reference

DOWNGRADIENT AREA GROUNDWATER INVESTIGATION FINAL REPORT; AGREED ORDER NO. DE 2553; KENT, WASHINGTON; JANUARY 22, 2008; PES Environmental.

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)

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 implemented)?⁴

_____ 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 cannot 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): _____

NA

⁴

⁵

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.

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS' code (CA750)**

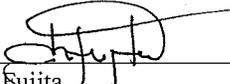
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8. Check the appropriate RCRAInfo status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting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

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" at the **B. S. B. Diversified Company, Inc.** facility, EPA ID # **WAD 07 665 5182**, located at **8202 South 200th Street, Kent, Washington 98032**. 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.

IN - More information is needed to make a determination.

Completed by (signature)  Date 8/5/09
(print) Hideo Fujita
(title) Environmental Engineer

Supervisor (signature)  Date 8/5/09
(print) Julie A. Sellick
(title) Supervisor, HWTRP/NWRO
(EPA Region or State) Washington

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