

**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: Boeing Everett
Facility Address: 3003 W. Casino Road, Everett, WA
Facility EPA ID #: WAD041585464

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?
- 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).

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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?

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): Facility upper perched aquifer: contaminated above Washington State Model Toxics Control Act (MTCA) drinking water standards. Furthermore, in these areas where groundwater contamination, above MTCA (potable) drinking water standards, have been documented, there are groundwater extraction wells operating to provide partial hydraulically containment of the groundwater plume and the migration of the contaminated upper aquifer is stable. Facility deeper Aquifer (Esperance Sand): This aquifer is potable and acts as a future drinking water source. TCE and its daughter products were found up to several orders of magnitude above MTCA drinking water cleanup levels in the Esperance Sand (lower) aquifer at the north end of the facility and downgradient/offsite.

Adequate characterization of the offsite TCE groundwater plume was completed in 2010.

A bioremediation interim action is ongoing in 2011 to remediate the TCE groundwater source area and will continue through 2012. Ecology is monitoring the progress of this source area TCE groundwater interim action. Another TCE groundwater mid-plume and downgradient remediation is planned for 2012 to reduce the TCE groundwater discharge to the nearby creek. Refer to the December 2010 Draft Revised Remedial Investigation Report; Year 1999-2011 Quarterly Groundwater Monitoring Reports; Ecology contingent approved Interim Action Work Plan for Powder Mill Gulch TCE Groundwater Source Area, dated June 20, 2006; Ecology contingent approved Bioremediation Interim Action Work Plan for Powder Mill Gulch TCE Groundwater Source Area, dated July 2, 2010; the Powder Mill Gulch Source Area TCE Groundwater Progress Reports, dated through June 2011; and Fifth Amendment to the MTCA Agreed Order dated April 2011.

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).

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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)?

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): Facility upper perched aquifer: contaminated above Washington State Model Toxics Control Act (MTCA) drinking water standards. Furthermore, in these areas where groundwater contamination, above MTCA (potable) drinking water standards, have been documented, there are groundwater extraction wells operating to provide partial hydraulically containment of the groundwater plume and the migration of contaminated upper aquifer is stable. Facility deeper Aquifer (Esperance Sand): This aquifer is potable and acts as a future drinking water source. TCE and its daughter products were found up to several orders of magnitude above MTCA drinking water cleanup levels in the Esperance Sand (lower) aquifer at the north end of the facility and downgradient/offsite.

Adequate characterization of the offsite TCE groundwater plume was completed in 2010. Based on groundwater chemical data, the contaminated groundwater plume is not migrating further within the aquifer.

A bioremediation interim action is ongoing in 2011 to remediate the TCE groundwater source area and will continue through 2012. Ecology is monitoring the progress of this source area TCE groundwater interim action. Another TCE groundwater mid-plume and downgradient remediation is planned for 2012 to reduce the TCE groundwater discharge to the nearby creek. Refer to the December 2010 Draft Revised Remedial Investigation Report; Year 1999-2011 Quarterly Groundwater Monitoring Reports; Ecology contingent approved Interim Action Work Plan for Powder Mill Gulch TCE Groundwater Source Area, dated June 20, 2006; Ecology contingent approved Bioremediation Interim Action Work Plan for Powder Mill Gulch TCE Groundwater Source Area, dated July 2, 2010; the Powder Mill Gulch Source Area TCE Groundwater Progress Reports, dated through June 2011; and Fifth Amendment to the MTCA Agreed Order dated April 2011.

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.

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4. Does “contaminated” groundwater **discharge** into **surface water** bodies?

If yes - continue after identifying potentially affected surface water bodies.

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): TCE contaminated groundwater discharges to Powder Mill Creek. Powder Mill Creek discharges to the Puget Sound (approximately 1.5 miles downstream). Refer to the December 2010 Draft Revised Remedial Investigation Report; Year 1999-2011 Quarterly Groundwater Monitoring Reports; Ecology contingent approved Interim Action Work Plan for Powder Mill Gulch TCE Groundwater Source Area, dated June 20, 2006; Ecology contingent approved Bioremediation Interim Action Work Plan for Powder Mill Gulch TCE Groundwater Source Area, dated July 2, 2010; the Powder Mill Gulch Source Area TCE Groundwater Progress Reports, dated through June 2011; and Fifth Amendment to the MTCA Agreed Order dated April 2011.

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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 key 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.

 X 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 each 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): Concentrations of TCE in Powder Mill Creek (near groundwater to surface water discharge points) are greater than the 10 times drinking water cleanup level. Concentrations of TCE quickly attenuate to below 10 times the groundwater drinking water cleanup level in the surface water, further downstream. Based on groundwater chemical data, the TCE groundwater plume is stable. Based on current data, Ecology estimates as much as 0.003 - 0.030 kg/hr TCE is discharged to the creek. Refer to the December 2011 Draft Revised Remedial Investigation Report; Year 1999-2011 Quarterly Groundwater Monitoring Reports; Ecology contingent approved Interim Action Work Plan for Powder Mill Gulch TCE Groundwater Source Area, dated June 20, 2006; Ecology contingent approved Bioremediation Interim Action Work Plan for Powder Mill Gulch TCE Groundwater Source Area, dated July 2, 2010; and the Powder Mill Gulch Source Area TCE Groundwater Progress Reports, dated through June 2011.

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

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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.

 X If unknown - skip to 8 and enter “IN” status code.

Rationale and Reference(s): Ecology does not have adequate information as this time to determine if the current discharge of TCE contaminated groundwater to Powder Mill Creek are acceptable to the ecological system. Concentrations of TCE in Powder Mill Creek (near groundwater to surface water discharge points) are greater than the 10 times drinking water cleanup level, however, concentrations of TCE quickly attenuate to below 10 times the groundwater drinking water cleanup level in the surface water, further downstream. At Ecology’s request, the City of Everett placed signage near the creek to advise pedestrian traffic to stay out of the creek. The groundwater is not currently used for drinking water purposes. No human health or ecological risk assessment has been conducted. Instead of conducting human health or ecological risk assessments, Ecology is requiring Boeing to conduct an interim action that significantly reduces the TCE groundwater flux to the creek. This interim action is planned for 2012.

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.

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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): Groundwater monitoring will continue throughout the remedial investigation, feasibility study and final cleanup remedy selection/implementation phases. Refer to the December 2010 Draft Revised Remedial Investigation Report; Year 1999-2011 Quarterly Groundwater Monitoring Reports; Ecology contingent approved Interim Action Work Plan for Powder Mill Gulch TCE Groundwater Source Area, dated June 20, 2006; Ecology contingent approved Bioremediation Interim Action Work Plan for Powder Mill Gulch TCE Groundwater Source Area, dated July 2, 2010; and the Powder Mill Gulch Source Area TCE Groundwater Progress Reports, dated through June 2011.

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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 _____ facility, EPA ID # _____, located at _____. 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.

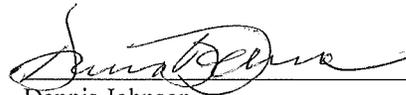
Completed by



Date 8/23/11

Dean Yasuda
Environmental Engineer
Hazardous Waste and Toxics Reduction Program
Washington State Department of Ecology, Northwest Regional Office

Supervisor



Date 8/23/11

Dennis Johnson
Hazardous Waste and Toxics Reduction Program, Section Supervisor
Washington State Department of Ecology, Northwest Regional Office

Locations where References may be found:

- (1) Washington State Department of Ecology-Central Files Office
Northwest Regional Office
3190 160th Ave SE
Bellevue, WA 98008-5452
(425) 649-7190
- (2) City of Everett
Main Library, Information Services
2701 Hoyt St.
Everett, WA 98201
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