Resource Contact: Policy and Technical Support Staff

References:

Effective: September 20, 2002

Revised: June 11, 2004

Procedure 321 Site Hazard Assessment of Model Toxics Control Act (MTCA) Sites By Local Health Districts/Departments For Ranking Under Washington Ranking Method

Ecology Site Ranking Coordinator (Ranking Coordinator)

1. Periodically updates Local Health District/Department Site Hazard Assessors (LHD Assessor) with names and addresses of Integrated Site Information System (ISIS) list sites with a Site Status of "Awaiting Assessment" under the MTCA.

2. Periodically updates LHD Assessors with names and addresses of U.S. Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) list sites for which an EPA determination of No Further Action (NFA) has been made.

LHD Assessors

3. Prepares prioritized list of ISIS sites, along with any other sites not yet reported to Ecology (sites for which LHD-conducted initial investigations (IIs) have been completed and the LHD recommends further action).

4. Provides respective Ecology Regional Office ISIS Coordinator (Regional ISIS Coordinator) with information from LHD IIs so sites can be entered onto ISIS, following Ecology regional office concurrence.

5. Provides Ecology regional office site assessment contact (Regional SHA Contact) and the Ranking Coordinator with a list of proposed high-priority sites for which SHAs are to be completed within the next six months, with a short justification narrative.

Ranking Coordinator

6. Reviews LHD-proposed SHA lists to screen for MTCA sites that are also on the EPA CERCLIS list and are either already under assessment, or are a high priority for near-future EPA investigative and/or ranking activities, or are scheduled for assessment by Ecology or EPA.
7. Notifies LHD Assessors and Regional SHA Contacts of sites currently being proposed to be assessed by Ecology or EPA.

Regional SHA Contact

8. Reviews LHD-proposed SHA lists, with input from II Staff (Regional Investigator) and/or Regional Voluntary Cleanup Program (VCP) Coordinator, assuring none of the sites have entered into the VCP.
9. Communicates mutual agreement on prioritization/selection of sites for upcoming SHAs to LHD Assessor(s) and Ranking Coordinator, noting any specific request regarding LHD sample and analysis plan (SAP) review and/or scope of Ranking Coordinator technical assistance activities.

LHD Assessor

10. Finalizes list of SHA sites for the coming six-month period and provides Ranking Coordinator with names and addresses of owners and operators for forthcoming SHA sites.

Ranking Coordinator

11. Sends SHA notification letters to site owners/operators, with copies to LHD Assessors and Regional SHA Contacts.
12. Maintains state-wide list of ongoing and completed SHAs and periodically updates the Site Register Coordinator.
13. Provides Washington Department of Health Hazardous Waste Section (DOH) and EPA Region 10 with list of forthcoming SHAs.

Site Register Coordinator

14. Periodically publishes names of new SHA sites, including contact name/phone number, in the Ecology Site Register.

LHD Assessor

15. Establishes specific dates of upcoming SHA site visits, communicating with site owners/operators through telephone contact if possible, along with follow-up letters.
16. Notifies Ranking Coordinator and Regional SHA Contact of upcoming SHA schedule.
17. Gathers file information and other site-specific environmental data to begin complication of SHA data collection summary sheets (SHADCSS) and/or Washington Ranking Method (WARM) score sheets, in preparation for site reconnaissances.
18. Prepares draft site-specific SAPs to be reviewed/commented on by the Ranking Coordinator and/or Regional SHA contact/Regional Investigator, as requested, prior to on-site sampling activities.
19. Prepares draft site-specific health and safety plans (HASPs) for approval by LHD Assessor Supervisors.

20. Provides copies of draft SAPs to Ranking Coordinator and/or Regional SHA Contact, as requested, at least seven days prior to scheduled date of SHA.

Ranking Coordinator

21. Reviews/comments on site-specific SAPs, incorporating any additional input from respective Regional SHA Contacts/Regional Investigators.

22. Makes appropriate recommendations for those SAPs where the scope of work exceeds, or does not meet, established TCP guidelines for SHAs for scoring/ranking sites using the Washington Ranking Method (WARM)

23. Notifies LHD Assessors of final recommendations/approval of SAPs, with copies, as requested, to Regional SHA Contacts.

LHD Assessor Supervisor

24. Approves HASPs prior to initiation of on-site SHA activities.

LHD Assessor

25. Requests sample bottles from Ecology-approved laboratory for those sites where environmental sampling is necessary.

26. Conducts SHAs along with, as appropriate/applicable/requested, representatives from Ecology and/or DOH, following established standard operating procedures (SOPs) for sampling, decontamination, and chain-of-custody activities.

27. Completes SHADCSS for each site, with all references documented, as appropriate.

28. Based on sampling results, compared to respective MTCA cleanup standards and/or other appropriate site-specific

assessment findings, makes recommendation(s) to the respective Regional SHA Contact, for any no further action (NFA) site(s).

29. Notifies site owner/operator, Regional SHA Contact, Ranking Coordinator, Ecology TCP Public Information Officer (PIO) and DOH of any sample results indicating an immediate threat to human health and/or the environment.

30. Completes applicable WARM Scoring Work Sheet 1-6 for each site that is to be ranked.

31. Calculates tentative migration route pathway scores, as applicable.

32. Completes Draft Summary Score sheets for all scored sites.

33. Calculates a projected WARM ranking for each site using quintile values obtained form previously established migration route pathway score ranges (supplied by Ranking Coordinator).

34. Provides Ranking Coordinator with completed draft WARM scoring package for each site to be ranked, including calculated tentative migration route pathway scores, as applicable, and the projected site ranking.

Ranking Coordinator

35. Quality assures all scoring packages for consistency and accuracy in application of the WARM Scoring Manual.

36. Finalizes all new pathway scores, with concurrence of LHD Assessors.

37. For August Hazardous Site List Updates: Adds new pathway scores to their respective cumulative master

pathway score database, deletes scores of delisted sites and establishes new quintile groupings in accordance with procedures described in Chapter Seven of the SHA Guidance and Procedures for WARM.

38. For February Hazardous Site List Updates: Utilizes applicable quintile values from migration route pathway score ranges established the previous August.

39. Calculates Human Health and Environmental Priority values for each site, using the quintile values obtained for all applicable pathways.

40. Obtains rank of each site using applicable priority values and ranking matrix in the WARM Scoring Manual.

41. Provides site ranks of newly completed SHAs to LHD Assessors and Regional SHA Contacts.

Regional SHA Contact

42. Informs appropriate Regional Investigator and any other appropriate staff of new site rankings and/or NFA determinations, where agreement is made with LHD recommendations.

43. Communicates with Ranking Coordinator for clarification on any site scoring/ranking issues in a timely manner to avoid delays in site listing.

LHD Assessor

44. Notifies site owners/operators of their site's ranking, or NFA status, at least two weeks prior to publication of the updated Hazardous Sites List in the Site Register (at least four weeks for publicly owned sites), or provides information to Regional SHA Contact to do so.

45. Supplies Ranking Coordinator with two double-sided copies of finalized scoring packages, and SHADCSS if completed, for each newly ranked site, and Narrative Summaries for any NFA sites.

46. Provides copy of complete site file with scoring packages for each SHA completed and ranked, to the Regional SHA Contact prior to publication of the Site Register.

47. Request DOH to conduct Health Consultations on newly ranked sites as needed.

48. Repeats appropriate Actions numbered 3-10 (above) to generate a list of highest LHD priority sites for SHAs during the coming six-month period.

Ranking Coordinator

49. Provides Site Register Coordinator with list of newly ranked sites, indicating: Ecology Region, Site Name, Nearest City, County, and Rank.

50. Provides updated Site Data Summary sheets for each ranked/NFA site to Regional ISIS Coordinators.

51. Provides copies of summary scoring sheets for all newly assessed and ranked sites to PIO prior to publication of Hazardous Sites List update in the Site Register.

52. Provides a listing of the newly assessed sites, and their rankings, to EPA Region 10 prior to publication in the Special Issue of the Site Register.

53. Provides to DOH copies of scoring packages, and SHADCSS as available, for all newly assessed and ranked sites.

Regional Section Manager

54. Any disputes pertaining to the implementation of this procedure shall be resolved by the respective regional section manager and the headquarters section manager. All efforts will be taken by implementing staff to resolve differences prior to elevation to section managers.

Approved: _____

James J. Pendowski, Program Manager
Toxics Cleanup Program