DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name:	Philip Services Corp (Burlington Environmental) - Georgetown
Facility Address:	734 S. Lucile St., Seattle, WA.
Facility ID #:	WAD 00081 2909

 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?

Х	If yes - check here and continue with #2 below
	If no - check here and re-evaluate existing data, or
	If data are not available – check here and skip to #6. 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, 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/COCs
Ground water	Х			The shallow and intermediate aquifers are contaminated above state cleanup levels. Contaminants include TCE, benzene, and vinyl chloride. Vinyl chloride concentrations have been detected in the 1000s of ppb range. Other COCs: PCE, DCEs, DCAs, BTEX, other VOCs, 1-4 dioxane, metals.
Air (indoors)	Х			Is being assessed. Risks are unacceptable in some locations. COCs include TCE and vinyl chloride. Indoor air contaminant attribution is often unclear.
Surface Soil (e.g., <2 ft)	Х			On the facility property. This area is presently covered with concrete or asphalt. COCs include chlorinated organics, BTEX constituents, metals, PCBs, etc. Levels of some of these COCs significantly exceed state cleanup levels for unrestricted use.
Surface Water			Х	It is unknown at this point if releases from the Georgetown facility have impacted the Duwamish River above state cleanup levels. However, groundwater sampling has indicated that vinyl chloride is present in areas SW of the facility, approaching the Duwamish River. Impacts to the river and its receptors will be more completely assessed in the FS Report.
Sediments			Х	(unlikely due to nature of COCs, but see SW comments above)
Subsurf. Soil (e.g., >2 ft)	Х			(see surface soil comments above)

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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Air	Х	We have assumed that soil gases releasing to the
(outdoors)		ambient air have not contributed sufficient mass of
		COCs to exceed ambient air cleanup levels.

- 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): Soils, soil gas, indoor air, and groundwater are contaminated with volatile organic compounds (VOCs) and other contaminants of potential concern (COPCs). More than thirty groundwater COPCs are at levels in excess of state cleanup levels. Contamination has been detected at the facility and in areas approaximately ³/₄ of a mile downgradient. This information is available in the November 2003 Remedial Investigation Report (RI Report) and multiple Technical Memoranda (discussing the results of supplemental characterization sampling and vapor intrusion assessment). Indoor air is contaminated with groundwater VOCs, and risks to human receptors are being evaluated in an on-going fashion Approximately 30 interim measures, intended to protect building occupants from vapor intrusion, have been installed. Several have not been implemented due to resistance from building owners. Groundwater contamination has been detected very close to the Duwamish Waterway, but it is unlikely that the source of most of this contamination is the PSC facility. There are additional sources, and suspect sources, between the facility and the waterway. Impacts of groundwater contamination on the waterway will be further evaluated in the draft FS Report (due in 2005).

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	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater				_X			
Air (indoors)	_X	X_	_?				
Soil (surface; <2')				_X			
Surface Water	_?					_?	_?_
Sediment	_?					_?_	_?
Soil (subsurface; >2')				_X			
Air (outdoors)				_X			

Instructions for <u>Summary Exposure Pathway Evaluation Table</u>:

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), check here and skip to #6. Enter "YE" status code, after explaining and/or referencing condition(s).
Х	If yes (pathways are complete for any "Contaminated" Media - Human Receptor
	combination) – check here and continue after providing supporting explanation.
	If unknown (for any "Contaminated" Media - Human Receptor combination) -
	check here and skip to #6. Enter "IN" status code.

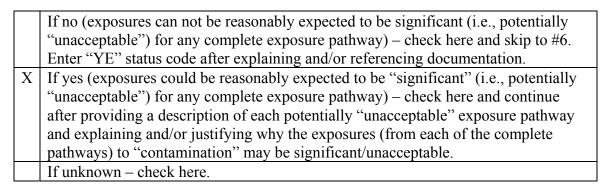
³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

<u>Rationale and Reference(s)</u>: Residences and businesses lie within and downgradient of the groundwater plumes. In areas, groundwater at shallow and 'intermediate' depths is unacceptably contaminated for drinking water purposes – though it is not currently used for this purpose. There are also areas where volatile contaminants in the shallow aquifer are so concentrated as to pose an unacceptable potential for vapor intrusion into overlying buildings. Risks to human receptors from indoor air contamination are being evaluated quarterly and IMs have been proposed/installed. Where IMs have been installed, it is very unlikely that current risks via vapor intrusion are unacceptable.

Soils are also unacceptably contaminated, but this appears to be limited to the facility's property and, possibly, property immediately to the west of the facility (but east of Denver Ave.). The PSC property is completely covered, and not being currently used.

There are measured concentrations of contaminants in groundwater near the Duwamish Waterway, but it is likely that a large portion of these concentrations are contributed from other sources in the area. The impact of groundwater contaminants discharging to the Waterway will be further evaluated in the FS Report.

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)?



<u>Rationale and Reference(s)</u>: As explained above, groundwater is unacceptably contaminated and residences and businesses lie within the plume. Groundwater contamination extends about 0.8 mile, approaching the Duwamish Waterway. Although the Georgetown area is zoned industrial, and no private domestic wells have been identified between the facility and the Waterway, concentrations of VOCs in shallow GW are high enough to lead to unacceptable indoor air quality via vapor intrusion. A large number of contaminants in groundwater between the facility and the Duwamish Waterway are above State surface water cleanup levels, but source attribution closer to the Waterway is unclear. Facility soils are also unacceptably contaminated, but due to the cover established on site and the current lack of site use, these soils do not pose a health risk.

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) – check here and continue. Enter "YE" after summarizing <u>and</u> referencing documentation justifying why all "significant" exposures to "contamination" are
	within acceptable limits (e.g., a site -specific Human Health Risk Assessment).
Х	If no (there are current exposures that can be reasonably expected to be
	"unacceptable")-check here and continue. Enter "NO" status code after providing a
	description of each potentially unacceptable exposure.
	If unknown – check here.

<u>Rationale and Reference(s</u>): As noted above, (1) groundwater is not a current source of drinking water; and, (2) contaminated on-site soils are covered. However, soil gas is contaminated, and groundwater levels exceed surface water cleanup levels. While it may be the case that exposures to COCs in surface water (through eating contaminated fish/shellfish) are not unacceptable, or that at least the levels of these COCs *contributed by the facility* are acceptable, it can be <u>reasonably expected</u> that vapor intrusion is leading to unacceptable levels of indoor air COCs in certain buildings. IMs have been proposed and installed to address this risk, but implementation has not been completed. In addition, some building owners have refused to allow access for installing the mitigation measures.

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):

	YE, "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 PSC-GT facility under current and reasonably
	expected conditions. This determination will be re-evaluated when
	the State becomes aware of significant changes at the facility.
NO	NO – "Current Human Exposures" are not "under control."
	IN – More info needed.

Completed by	(signature)		Date	
	(print)	Ed Jones	7/_/04	
	(title)	Environmental Engineer		

Supervisor	(signature)	Date	
	(print)		
	(title)		
	(WA State Dept of Ecology)		

Locations where References may be found: EPA Region 10 Office of Waste and Chemicals Management 1200 Sixth Ave. Seattle, WA Washington Department of Ecology, Northwest Regional Office 3190 160th Ave. SE Bellevue, WA Georgetown Gospel Chapel Repository

Locations where References may be found: 6606 Carleton Ave. S. Seattle, WA

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

Interim Final

2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name:	Philip Services Corp (Burlington Environmental) -			
	Georgetown			
Facility Address:	734 Lucile St., Seattle, WA			
Facility EPA ID #:	WAD 00081 2909			

 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?

Х	If Yes – check here
	If No – check here and re-evaluate existing data
	If data are not available – check here and skip to #6 and enter "IN"

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).

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?

Х	If yes – check here and continue after identifying key COCs, citing appropriate		
	"levels", and referencing supporting documentation		
	If no – check here and skip to #8. Enter "TE" status code		
	If unknown – check here and skip to #8. Enter "IN" status code.		

Rationale and Reference(s): Shallow and intermediate zone groundwater has over 30 hazardous compounds which exceed state cleanup levels, established for protecting the water for drinking purposes and for protecting surface water. A number of VOCs also exceed target levels set to be protective of indoor air.

References: November 2003 Remedial Investigation Report (RI Report), and numerous Technical Memoranda (beginning in 2001).

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).

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 – check here and continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier) and rationale².

If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"²) – check here and skip to #8, entering "NO" status code

X If unknown – check here and skip to #8. Enter "IN" status code.

Rationale and Reference(s): The extent of downgradient groundwater contamination at the site was unknown until early 2001. Since that time wells have been installed and monitored quarterly. A subsurface barrier wall, encircling the facility, was constructed in late 2003/early 2004.

COC levels in downgradient groundwater have not appeared to change significantly since mid-2002 and "sentry' wells have, for the most part, not indicated increasing COC levels. However, this 2 year "snapshot" gives us little indication of whether the area of contamination is expanding over time. While it is likely that completion of the barrier wall will *stabilize* COC concentrations in the immediate vicinity of the facility, it is unknown whether portions of the plume downgradient continue to "expand." The 2005 draft FS Report will estimate the degree/likelihood of plume stabilization.

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.

4) Does "contaminated" groundwater discharge into surface water bodies?

If yes - continue after identifying potentially affected surface waterbodies.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):

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 judgement/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.

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 ecosystems 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 bioassays/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.

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.

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

Rationale and Reference(s):

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?"

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):

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).

	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 PSC-Georgetown
	facility, EPA/Ecology ID# WAD 00081 2909.
	NO - Unacceptable migration of contaminated groundwater is observed
	or expected.
IN	IN - More information is needed to make a determination.
	The 10/03 RI Report will estimate plume stability. Once the subsurface
	barrier wall is constructed (early 2004), plume stability will be re-
	assessed. To date, downgradient monitoring has not been conducted over
	a long enough period to conclude whether contamination is expanding.

 Completed by	(signature)		Date	
	(print)	Ed Jones	7//04	
	(title)	Environmental Engineer		

Supervisor	(signature)	Date	
	(print)		
	(title)		
	(WA State Dept of Ecology)		

Locations where References may be found: EPA Region 10 Office of Waste and Chemicals Management 1200 Sixth Ave. Seattle, WA

Washington Department of Ecology

Locations where References may be found:

Northwest Regional Office 3190 160th Ave. SE Bellevue, WA

Georgetown Gospel Chapel Repository 6606 Carleton Ave. S. Seattle, WA

Contact telephone and e-mail numbers

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