

Aluminum Recycling Trentwood Cleanup



Ecology proposes to dispose the aluminum-processing waste pile seen in the foreground in a permitted landfill.

Comments accepted:

June 9 – July 9, 2021

Submit comments:

Online at:

<http://tcp.ecology.commentinput.com/?id=Quif3>

Or by mail or email to:

Sandra Treccani, Site Manager
4601 North Monroe Street
Spokane, WA 99205
sandra.treccani@ecy.wa.gov
Questions? 509-329-3412

Document review locations:

<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=1081>

Due to coronavirus, in-person document reviews are not currently available. Please contact Erika Beresovoy at erika.beresovoy@ecy.wa.gov or 509-385-2290 if you need printed documents.

Facility Site ID: 628

Site Cleanup ID: 1081

Site address: 2317 N. Sullivan Rd.
Spokane Valley, WA 99216

Public invited to comment on draft cleanup plan

The Washington State Department of Ecology (Ecology) is asking the public for comments on the following draft documents for the Aluminum Recycling Trentwood site: cleanup action plan, enforcement order, scope of work and schedule, and revised feasibility study. Ecology is proposing that Union Pacific Railroad (UPRR), the site owner, moves stockpiled aluminum-processing byproducts to a permitted landfill and caps any remaining contamination.

The enforcement order is a legal document requiring UPRR to complete the cleanup. Ecology and UPRR could not reach an agreement during the agreed order negotiations, so we are issuing an enforcement order. The order includes a scope of work and schedule for the cleanup.

Site history

Between 1979 and 1984, the site was used to process and store aluminum. “Primary” and “secondary” aluminum processing was used. The processing created white and black dross as byproducts. When processing ended, two stockpiles of dross were left at the site.

Around 1986, UPRR removed one stockpile and put it in a landfill. In 2017, UPRR removed about 360 cubic yards of the other stockpile to test using it as a raw material in cement production. About 57,000 cubic yards of the second stockpile is left and covers nearly 4 acres.

The remaining stockpile covers an area that includes two neighboring properties (see Figure 1, Page 3). The neighboring properties are owned by Pentzer Venture Holdings II Inc. (Pentzer) and the Washington State Department of Transportation (WSDOT). Pentzer is also responsible for cleanup but is not included in the enforcement order.

Cleanup options

Ecology looked at the four cleanup options on page 2 for the draft cleanup action plan. UPRR presented three of these options in the

Toxics Cleanup Program

2012 feasibility study. The feasibility study was revised in 2021 to include the fourth option and other changes that are explained in the study's executive summary.

- 1. Install institutional controls and monitor.** This option would use fencing to restrict access and institutional controls including deed restrictions. This option doesn't meet Washington's minimum requirements for environmental cleanups, so Ecology didn't consider it.
- 2. Consolidate and cap the waste on-site.** All contaminated soil would be combined with the main waste pile. The stockpile would be regraded, shaped, and compacted to minimize slope steepness. A low-permeability barrier and soil cover would be put over the stockpile. The cap would keep people, plants, and wildlife from contacting waste, and would stop wind and water contact and erosion. The estimated cost for this option is \$3,929,000.
- 3. Excavate and dispose the waste at a permitted landfill.** The worst waste and contaminated soil would be removed, transported by truck, and disposed of at the Waste Management Landfill at Graham Road in Medical Lake. Because the Spokane River and a recreational trail are near the site, all remaining contaminated soil would be removed from the Pentzer and WSDOT properties and capped on the UPRR property. No deed or use restrictions would be needed for the Pentzer and WSDOT properties. The cap would keep people, plants, and wildlife from contacting waste, and would stop wind and water contact and erosion. The estimated cost for this option is \$8,082,000.
- 4. Reuse the waste in cement production.** All waste and contaminated soil would be removed, loaded into rail cars, and shipped to a facility in California for use as an alternative raw material in cement production. The estimated cost for this option is \$6,737,000.

We propose Option 3: Excavate and dispose the waste at a permitted landfill

In addition to the actions described in Option 3 above, the ground would be graded and replanted. Any remaining contamination on the UPRR property that doesn't require offsite disposal would be capped with one or more of the following materials: asphalt, concrete, or a geotextile barrier with a minimum of 6 inches of crushed rock on top.

Because contamination would remain under the cap, periodic monitoring and maintenance, fencing, deed restrictions, and periodic reviews would be required for the UPRR property. Ecology would complete a periodic review every five years after the cleanup action is finished (waste excavated and disposed, cap installed) to make sure the cap continues to protect human health and the environment.

Why not reuse the waste?

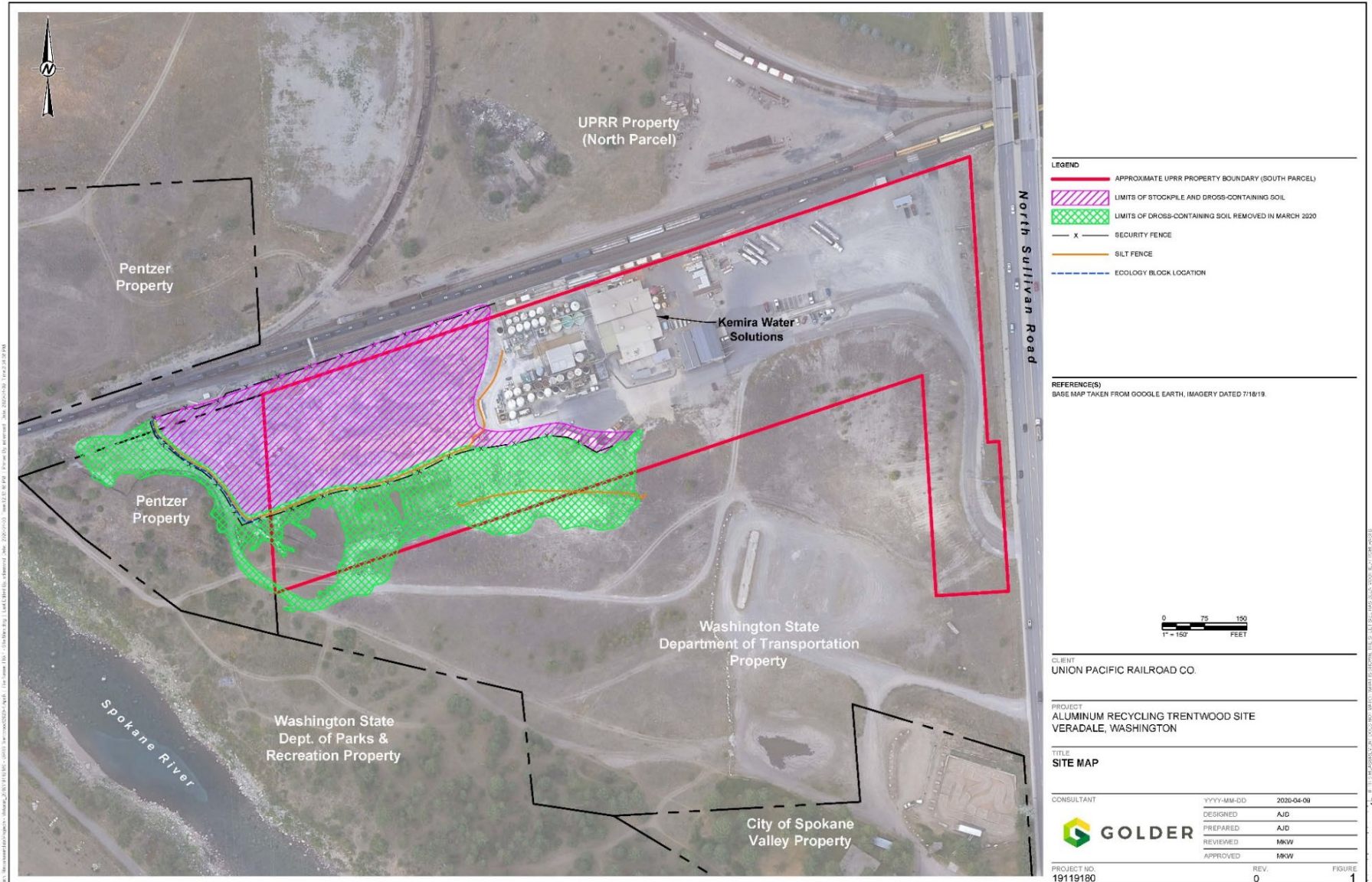
Although Option 4 costs less, UPRR has decided it is no longer an option. Reusing all the waste would take more than two years because of the amount of waste used in each batch and the limited availability of rail cars. It would also mean more human exposure because the waste would need to be dried and handled.

Option 3 meets all the basic requirements in Washington's cleanup law, the most important of which is protecting human health and the environment. Option 3 also better meets the additional requirements in the law: it's a permanent solution, provides more reliable long-term protection of human health and the environment than options 2 and 4, and cleanup is finished faster.

Next steps

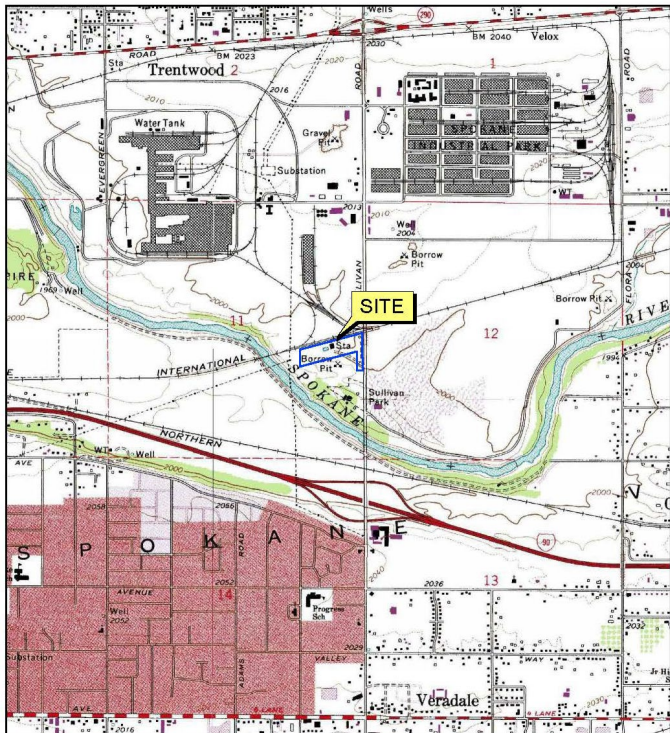
Ecology will respond to all the comments we receive by July 9, 2021, and publish our responses after that. We will hold an online public meeting if 10 people request it. Then, after we consider public comments, the draft cleanup action plan and other documents will become final. If we significantly revise the plan in response to public comments, another draft version will go out for public review. If not, Ecology will order UPRR to follow the plan, scope of work, and schedule to complete the work.

Figure 1. Aluminum Recycling Trentwood site map



Toxics Cleanup Program
4601 North Monroe Street
Spokane, WA 99205

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Accommodation Requests: To request Americans with Disabilities Act (ADA) accommodation, or printed materials in a format for the visually impaired, contact the Ecology ADA Coordinator at 360-407-6831 or ecyadacoordinator@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.