



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

August 28, 2023

Tia Daulp, Site Manager
Intalco Aluminum LLC
4050 Mountain View Rd
Ferndale, WA 98248

Re: Notice of Periodic Review Conducted for the Following Site:

- **Name:** Triple Lined landfill, Intalco Aluminum LLC
- **Address:** 4050 Mountain View Rd, Ferndale, WA 98248
- **Cleanup Site ID:** 2280
- **Facility/Site ID:** 16

Dear Tia Daulp:

Under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW, which governs the cleanup of hazardous waste sites in Washington State, the Department of Ecology (Ecology) must conduct a periodic review of all sites with institutional controls and environmental covenants every five years. This letter serves to inform you that a periodic review has been conducted for the Triple Lined Landfill at the Intalco Aluminum LLC Ferndale site.

The periodic review process includes the following steps: confirmation that the environmental covenant is still active and recorded with the title to the property, a review of any monitoring data collected since the cleanup was completed or since the last review was conducted, and a site visit to confirm the institutional controls and conditions of the environmental covenant are being followed.

Based on the information collected during this periodic review, the Triple Lined Landfill cleanup appears to meet the requirements of Chapter 173-340 WAC, and the selected remedy continues to be protective of human health and the environment.

Ecology provided notice and an opportunity for public comment on the periodic review from July 1 to August 7, 2023. Ecology received one comment during the comment period. Ecology's response to the comment received has been included in Appendix D of the attached report.

A periodic review will continue to be required every five years as long as institutional controls and/or an environmental covenant are required to protect human health and the environment.

Periodic Review for Triple Lined landfill
Intalco Aluminum LLC
August 28, 2023
Page 2

If you have any questions regarding this letter please contact me at 360-819-6426 or greg.gould@ecy.wa.gov.

To request ADA accommodation for disabilities, or printed materials in a format for the visually impaired, contact Ecology at 360-280-4325 or ecyadacoordinator@ecy.wa.gov. Persons with impaired hearing may call Washington Relay Service at 711. Persons with a speech disability may call TTY at 800-833-6384.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gregory Gould", is positioned above a horizontal line.

Gregory Gould, P.E.
Industrial Section
Solid Waste Management Program

Enclosure

Electronic cc: Kristin Gaines (Intalco)



Second Periodic Review Intalco Aluminum Corp Ferndale

**4050 Mountain View Road, Ferndale, Whatcom County
Facility Site ID: 16, Cleanup Site ID: 2280**

Solid Waste Management Program, Industrial Section

Washington State Department of Ecology
Lacey, Washington

August 2023

Document Information

This document is available on the Department of Ecology's [Intalco Aluminum Corp Ferndale cleanup site page](https://apps.ecology.wa.gov/cleanupsearch/site/2280).¹

Related Information

- Facility Site ID: 16
- Cleanup Site ID: 2280

Contact Information

Solid Waste Management Program

Industrial Section

Greg Gould, P.E., Facility Engineer

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Olympia, WA 98504

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Phone: 360-819-6426

Website: [Washington State Department of Ecology](https://ecology.wa.gov)²

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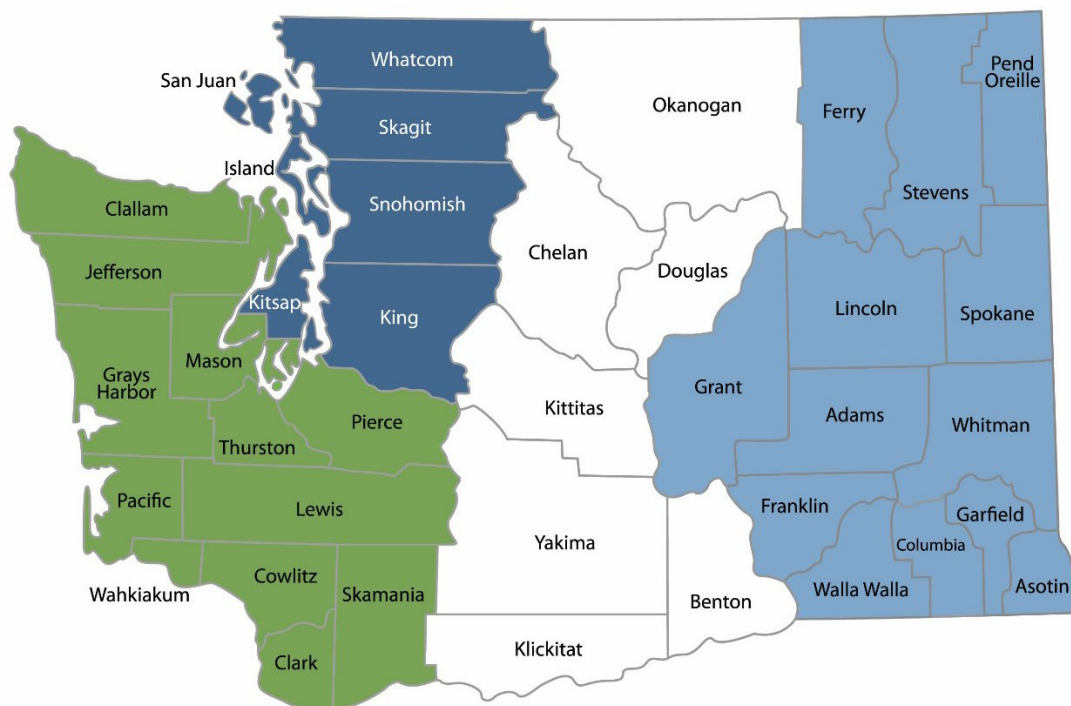
¹ <https://apps.ecology.wa.gov/cleanupsearch/site/2280>

² <https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup>

³ <https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility>

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region
360-407-6300

Northwest Region
206-594-0000

Central Region
509-575-2490

Eastern Region
509-329-3400

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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Introduction

The Washington State Department of Ecology (Ecology) reviewed post-cleanup site conditions and monitoring data to ensure human health and the environment are being protected at the Intalco Aluminum Corp Ferndale (Site). Site cleanup was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). This is the second periodic review conducted for this Site for the Triple-Lined Landfill (TLL). Ecology completed the first periodic review for the TLL in June 2018. A periodic review of the Site's Beach I, Beach II, Closed Construction Debris, and Double-Lined Landfills is not included in this report. The periodic review for these landfills was completed in January 2016 and August 2021, and will not be due again until 2026.

Cleanup activities at this Site were completed under Consent Decree No. 07-2-00181-2 effective February 2, 2007. The MTCA cleanup levels for soil and groundwater are established under [WAC 173-340-740](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740)⁴ and [WAC 173-340-720](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720),⁵ respectively.

Ecology determined institutional controls in the form of a restrictive covenant would be required as part of the cleanup action for the Site for the TLL. [WAC 173-340-420\(2\)](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-420(2))⁶ requires Ecology to conduct a periodic review of certain sites every five years. For this Site, a periodic review is required because an institutional control for the TLL is required by the cleanup action.

When evaluating whether human health and the environment are being protected, Ecology must consider the following factors (WAC 173-340-420(4)):

- a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site.
- b) New scientific information for individual hazardous substances or mixtures present at the site.
- c) New applicable state and federal laws for hazardous substances present at the site.
- d) Current and projected site and resource uses.
- e) The availability and practicability of more permanent remedies.
- f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

Ecology publishes a notice of all periodic reviews in the *Site Register* and provides an opportunity for public comment.

⁴ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740>

⁵ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720>

⁶ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-420>

Summary of Site Conditions

Site description and history

The Site is located at 4050 Mountain View Road in Ferndale, Washington, in Whatcom County. The aluminum production facility consists of approximately 320 acres on a 1,200-acre upland tract. The plant operated continuously from May 8, 1966 until September 2020, with the exception of a temporary curtailment from June to December 2001. In September 2020, Intalco curtailed the plant operations. The TLL is a limited purpose landfill constructed to receive select solid and dangerous wastes resulting from the aluminum smelting process, primarily spent potline (SPL) and sludge from the secondary wastewater treatment system. In 1988, Intalco stopped disposing of SPL in the TLL and began shipping SPL to a permitted off-site facility. During this time, Intalco continued to dispose of secondary wastewater treatment plant sludge in the TLL. Intalco resumed disposing of SPL and began disposing of solid waste in the TLL in 2007. The TLL also accepted waste from the Site's Beach II Landfill in 2005. Table 1 lists the waste materials Intalco managed in the TLL.

Intalco constructed the TLL in phases with the original cell constructed in 1986 and a lateral extension constructed in 1990. In 1992, a second cell of the TLL was proposed but never constructed. The TLL was designed to meet the regulations for Interim Status Hazardous Waste Landfills (40 CFR 265) under the Resource Conservation and Recovery Act (RCRA) and for Dangerous Waste Landfills under 173-303 WAC. The TLL is currently regulated under Interim Status per WAC 173-303-805. In June 2011, capacity was reached at the TLL and Intalco completed closure on November 28, 2011 as part of the Intalco Landfill Closure Program.

A vicinity map is in Appendix A, and a Site plan is in Appendix B.

Table 1 TLL Waste Types and Quantities

Waste Material	Estimated Quantity (cubic yards)	Estimated Quantity (tons)
K088 (Spent Potliner and Secondary Wastewater Treatment Plant Sludge)	75,600	98,300
Non-TSCA Remediation Waste from Beach II Landfill	14,960	20,200
TSCA Remediation Waste from Beach II Landfill	22,660	30,600
General Plant Solid Waste	43,800	52,550

Site investigations

Cleanup activities at this Site completed under Consent Decree No. 07-2-00181-2 focused on remedies at the Beach I, Beach II, Closed Construction Debris Landfills.

No cleanup remedies were required in the Consent Decree for the TLL. The Consent Decree allowed Intalco to dispose of TSCA and Non-TSCA Remediation Waste from Beach II Landfill into the TLL. In addition, the Consent Decree required Intalco to construct a cover system for the TLL in accordance with Intalco's Part B Dangerous Waste Permit Application, place a restrictive covenant on the TLL property, and perform groundwater monitoring at the TLL in accordance with Intalco's closure plan meeting the requirements of the Dangerous Waste Regulations.

After the TLL was closed in November 2011, Intalco staff observed water flowing from one of the Leak Detection System (LDS) monitoring points in the spring of 2012. A subsequent investigation found that the source was stormwater runoff. The investigation found that the LDS geonet in the east cell anchor trench was in direct contact with the primary high-density polyethylene (HDPE) geomembrane liner and secondary HDPE geomembrane liner which created a hydraulic connection to the LDS. The selected solution included extrusion-welding the primary liner to the secondary liner with the east cell anchor trench, thereby eliminating the water intrusion pathway into the LDS. The LDS solution also provided for sealing the west cell in the event the water intrusion into the LDS was still occurring following repairs to the east cell.

While a video survey did not indicate any leak in the LDS lateral piping, a different source still appeared to allow a small volume of surface water to infiltrate to the LDS. Intalco discovered that stormwater was still flowing into the LDS after fixing the anchor trenches. Repairs did reduce the volume of water infiltrating to the LDS. Currently, Intalco sends all water from the LDS to the Secondary Wastewater Treatment Plant for treatment. Intalco continuously monitors conductivity of water from the LDS in order to support that only precipitation enters the LDS. Intalco provided Ecology conductivity measurements for water from the LDS from January 1, 2022 through May 3, 2022. The average conductivity was 135 micro-Siemens per centimeter ($\mu\text{S}/\text{cm}$) based on 91 measurements. Intalco sets an alarm when conductivity exceeds approximately 900 $\mu\text{S}/\text{cm}$, groundwater at the facility is approximately 540 $\mu\text{S}/\text{cm}$, and leachate from the TLL is approximately 11,000 $\mu\text{S}/\text{cm}$. Ecology notes that the TLL also has a leachate collection system, which is different than the LDS. In April 2022, Intalco opened the TLL's leachate collection system valve and no liquid came out. This supports Ecology and Intalco's understanding that no leachate is entering the LDS, rather the water Intalco observes in the LDS is precipitation.

Cleanup actions

The Consent Decree No. 07-2-00181-2 did not require cleanup actions at the TLL. See Section "Site investigations" for details on what the Consent Decree did require for the TLL. Intalco submitted a Part B Dangerous Waste Permit Application for the TLL in 1986, the same year Intalco constructed and began operations at the TLL. Once Intalco submitted the application in 1986, the TLL became regulated as under Interim Status. Ecology has not issued a final permit for the TLL, so the TLL continues to be regulated under Interim Status.

Groundwater monitoring

While post-closure requirements were not included as part of Consent Decree No. 07-00181-2, the following discussion has been included in this periodic review. The TLL's post-closure plan requires Intalco to monitor groundwater and report groundwater flow rate and direction for four (4) consecutive quarters once every five years during the 30-year post-closure period, which began in 2012. Post-closure monitoring is conducted during the year prior to the 5, 10, 15, 20, 25, and 30 monitoring years. The [2015](#)⁷ and [2020](#)⁸ groundwater monitoring reports are available on Ecology's website.

Groundwater is monitored from the uppermost aquifer located near the TLL. Eleven monitoring wells are included in the TLL's post-closure groundwater monitoring program:

- Six point of compliance wells (SMW-02, SMW-03, SMW-08, SMW-12, SMW-14, and SMW-19),
- Four additional monitoring locations (SMW-06, SMW-09, SMW-10, and SMW-15), and
- One background location (SMW-13).

The groundwater quality during four rounds of monitoring in 2020 was generally consistent with groundwater data collected from 1988 through 2011 (the operational groundwater monitoring period) and in 2015 (the first post-closure groundwater monitoring period). Six wells met the primary and secondary maximum contaminant levels (MCL) for all constituents. In the remaining five wells, the following parameters exceeded the secondary MCLs for one or more quarterly monitoring events in 2020:

- Chloride (secondary MCL) in well SMW-03.
- Fluoride (primary MCL) in well SMW-15.
- The pH levels (secondary groundwater quality standard (GWQS)); below the lower limit of 6.5) in well SMW-08.
- Specific conductance (secondary MCL) in wells SMW-03, SMW-12, and SMW-13.

The groundwater flow paths and flow velocities for 2020 were similar to the operational groundwater monitoring period and first post-closure groundwater monitoring period, which indicates the monitoring well network is appropriately positioned to detect releases from the TLL to the uppermost aquifer.

Table 2 shows the groundwater quality parameters Intalco sampled for with the associated MCLs.

Table 2 Groundwater Quality Parameters

Parameter	MCL
Temperature	-

⁷ <https://apps.ecology.wa.gov/cleanupsearch/document/65851>

⁸ <https://apps.ecology.wa.gov/cleanupsearch/document/109269>

Parameter	MCL
pH	6.5 to 8.5 (Secondary GWQS)
Specific Conductance	700 micromhos per centimeter (Secondary MCL)
Total Aluminum	-
Total Calcium	-
Chloride	250 milligrams per liter (mg/L) (Secondary MCL)
Total Cyanide	0.2 mg/L (Primary MCL)
Total Fluoride	4.0 mg/L (Primary MCL), 2.0 mg/L (Secondary MCL)
Total Potassium	-
Total Sodium	-
Sulfate	250 mg/L (Secondary MCL)

Cleanup standards

Cleanup standards include cleanup levels, the location where these cleanup levels must be met (point of compliance), and any other regulatory requirements that apply to the Site. [WAC 173-340-704](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704)⁹ states MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used. Method B may be used at any site and is the most common method for setting cleanup levels when sites are contaminated with substances not listed under Method A. Method C cleanup levels may be used to set soil and air cleanup levels at industrial sites.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for contaminants at this Site. The cleanup actions conducted at the Site were determined to be routine, few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance.

The point of compliance is the area where the cleanup levels must be attained. For soil cleanup levels based on the protection of groundwater, as they are for this Site, the point of compliance is established as soils throughout the Site (standard point of compliance).

The Site has a conditional point of compliance for groundwater, which was established at the property boundary.

All cleanup levels specified in the Consent Decree are for the Beach I, Beach II, Closed Construction Debris Landfills, not for the TLL.

⁹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704>

Restrictive Covenant

Ecology determined that institutional controls would be required as part of the cleanup action to document the remaining contamination, protect the cleanup action, and protect human health and the environment. On March 26, 2012, institutional controls in the form of an [restrictive covenant](https://apps.ecology.wa.gov/cleanupsearch/document/61361)¹⁰ (Covenant) were recorded for the Site for the TLL.

The Covenant recorded for the Site imposes the following limitations:

1. The Owner shall not alter, modify, or remove the existing structure in any manner that may result in the release or exposure to the environment of that dangerous waste or create a new exposure pathway without prior written approval from Ecology. Any activity on the Site that may result in the release or exposure to the environment of the dangerous waste that was contained as part of the Remedial Action, or create a new exposure pathway, is prohibited.
2. Withdrawal of groundwater at the Site is prohibited.
3. Any activity on the Site that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.
4. Any activity on the Site that may result in the release or exposure to the environment of a hazardous substance that remains on the Site as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.
5. The Owner of the Site, or any portion thereof, must give fifteen (15) days advance written notice to Ecology of the Owner's intent to convey any interest in the Site or said portion thereof. No conveyance of title, easement, lease, or other interest in the Site shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action in accordance with the Consent Decree and Cleanup Action Plan.
6. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Site. The Owner must include in an instrument conveying any interest in any portion of the Site, notice of the Restrictive Covenant.
7. The Owner must notify and obtain approval from Ecology prior to any use of the Site that is inconsistent with the terms of the Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment. If Ecology approves of an inconsistent use, the Restrictive Covenant must be amended to reflect the change.

¹⁰ <https://apps.ecology.wa.gov/cleanupsearch/document/61361>

8. The Owner shall allow authorized representatives of Ecology the right to enter the Site at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect the Remedial Action conducted at the Site, to determine compliance with the Restrictive Covenant, and to inspect records that are related to the Remedial Action.
9. If the conditions at the Site which requires a restrictive covenant no longer exist, the Owner may submit a request to Ecology that the Restrictive Covenant be removed. The Restrictive Covenant shall be removed only if Ecology, after public notice and comment, concurs.

Periodic Review

Effectiveness of completed cleanup actions

During the Site visit Ecology conducted on October 26, 2022, the landfill cap at the TLL continues to prevent exposure to waste and contaminated soils through ingestion and direct contact. The TLL cap appears to be in satisfactory condition. No other contingency actions have been required with respect to the Consent Decree requirements for the TLL. The Site is currently operating as a curtailed aluminum smelter. A photo log is in Appendix C.

Direct contact

The cleanup actions were intended to eliminate exposure to waste at the Site in the TLL. Exposure pathways to contaminated soils by ingestion and direct contact were reduced by placing all waste in the TLL and capping the landfill in accordance with the Part B Dangerous Waste Application. The TLL cap appears to be in satisfactory condition, and no repair, maintenance, or contingency actions are required at this time.

Protection of groundwater

The Consent Decree did not require Remedial Actions of soils near the TLL. The Remedial Actions at the Site consisted of placing contaminated soils with polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and fluoride in the TLL. As described earlier, Intalco monitors groundwater at the Site around the TLL for temperature, pH, specific conductance, total aluminum, total calcium, chloride, total cyanide, total fluoride, total potassium, total sodium, and sulfate.

Institutional controls

Institutional controls in the form of a Covenant were implemented at the Site in 2012. The Covenant remains active and discoverable through the Whatcom County Assessor's Office. Ecology found no evidence a new instrument has been recorded that limits the effectiveness or applicability of the Covenant.

This Covenant prohibits activities that will result in the release of contaminants contained as part of the cleanup action and prohibits any use of the property that is inconsistent with the Covenant, unless approved by Ecology in advance. This Covenant ensures the long-term integrity of the cleanup action will be protected.

New scientific information for individual hazardous substances or mixtures present at the Site

There is no new relevant scientific information for the hazardous substances remaining at the Site.

New applicable state and federal laws for hazardous substances present at the Site

There are no new applicable or relevant state or federal laws for hazardous substances remaining at the Site.

Current and projected site and resource uses

The Site is used for industrial purposes. There have been no changes in current or projected future Site or resource uses. The current Site use is not likely to have a negative impact on the protectiveness of the cleanup action.

Availability and practicability of more permanent remedies

The remedy implemented included containing hazardous substances, and it continues to be protective of human health and the environment. While more permanent remedies may be available, they are still not practicable at this Site.

Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the cleanup action were capable of detection below the selected MTCA cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

Conclusions

- The cleanup actions completed at the Site appear to be protective of human health and the environment.

- The Covenant for the property is in place and is effective in protecting human health and the environment from exposure to hazardous substances and the integrity of the cleanup action.

Based on this periodic review, Ecology has determined the requirements of the Covenant are being followed. No additional cleanup actions are required by the property owner at this time. The property owner is responsible for continuing to inspect the Site to ensure the integrity of the cleanup action is maintained such as the TLL's surface cap.

Next review

Ecology will schedule the next review for the Site five years from the date of this periodic review. If additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years after those activities are completed.

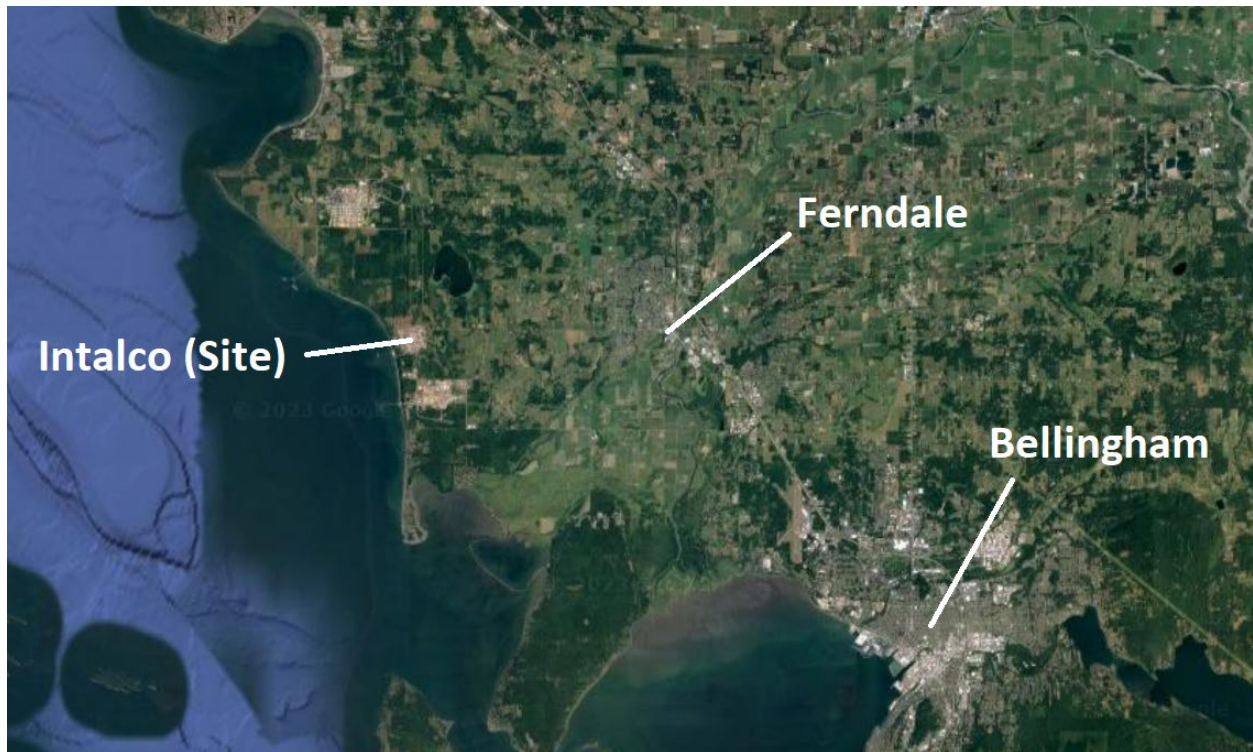
References

Ecology. *First Periodic Review*. June 15, 2018.

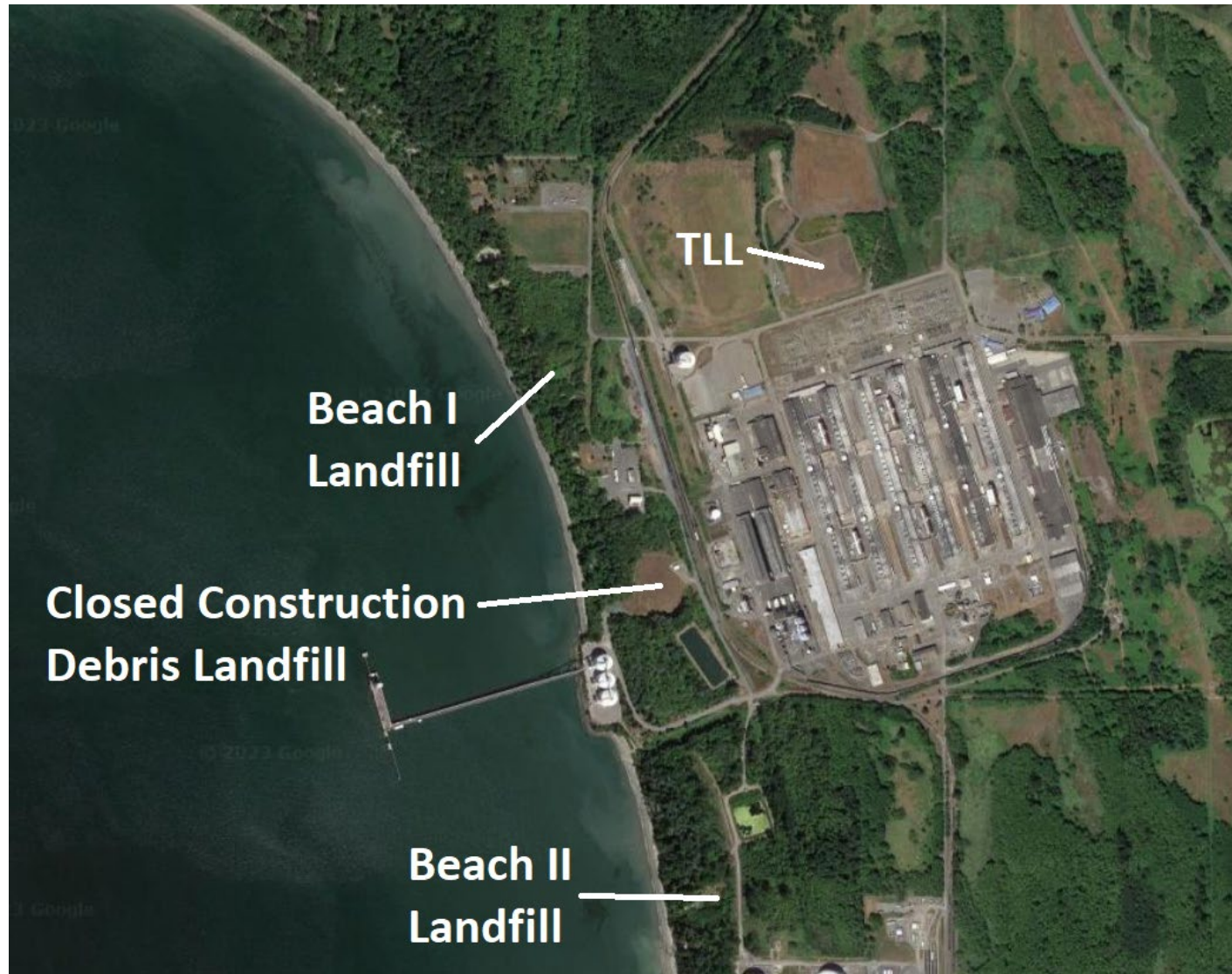
Ecology. *Restrictive Covenant*. March 26, 2012.

Ecology. Site visit. October 26, 2022.

Appendix A. Vicinity Map



Appendix B. Site Plan



Appendix C. Photo Log

Photo 1: West drainage ditch looking south



Photo 2: South drainage ditch looking east near leak detection port LD2



Photo 3: Northwest corner of TLL looking east



Photo 4: Top of TLL looking west



Appendix D. Response to Comments

Ecology advertised notice of opportunity to comment on this Periodic Review on Ecology's webpage for the site, in the *Site Register* and in the agency's online public involvement and events calendar. We also sent notices to everyone who expressed interest in this site. The comment period took place July 1 – August 7, 2023.

Comments and Responses

Comments

The "Triple Lined" cap sounds impressive. What about Ground Monitoring? How many wells and what are the results? Intalco is now closed and for sale. Who will be monitoring and responsible for this site?

Ecology Responses

Ecology appreciates the commenter's questions and interest in this cleanup project.

Ecology assumes the commenter is referring to groundwater monitoring sample results. See the section in this Periodic Review called "Groundwater monitoring" for more information.

Groundwater is monitored from the uppermost aquifer located near the Triple-Lined Landfill (TLL). Eleven monitoring wells are included in the TLL's post-closure groundwater monitoring program:

- Six point of compliance wells (SMW-02, SMW-03, SMW-08, SMW-12, SMW-14, and SMW-19),
- Four additional monitoring locations (SMW-06, SMW-09, SMW-10, and SMW-15), and
- One background location (SMW-13).

The [2015](#)¹¹ and [2020](#)¹² groundwater monitoring reports are available on Ecology's website and present the sample results.

Ecology has [named Intalco a potentially liable person \(PLP\)](#)¹³ for the site. This means Intalco is responsible for the site, including cleanup activities and groundwater monitoring. If a new owner or operator comes to the site, Ecology may name the new owner or operator as a PLP. In that case, the new owner or operator will also be responsible for the site.

¹¹ <https://apps.ecology.wa.gov/cleanupsearch/document/65851>

¹² <https://apps.ecology.wa.gov/cleanupsearch/document/109269>

¹³ <https://apps.ecology.wa.gov/cleanupsearch/document/128229>