



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

April 9, 2024

Edgar Scott
Kaiser Aluminum Investments Company
1550 West McEwen Drive, Suite 500
Franklin, TN 37067

Re: Assessment Plan Response:

- **Site Name: Heglar Kronquist**
- **Site Address: Heglar Rd & Kronquist Rd, Mead, WA 99021**
- **Cleanup Site ID: 1135**
- **Facility/Site ID: 645**
- **County Assessor's Parcel Number(s): 46032.9022**

Dear Edgar Scott:

This letter is in response to the [Assessment Plan for Heglar-Kronquist Landfill](#)¹ (Assessment Plan). The Washington State Department of Ecology (Ecology) appreciates the time and effort Kaiser took to compose the Assessment Plan for the Heglar-Kronquist Landfill (Site).

Ecology agrees that collecting quarterly water samples from MW-1, MW-3, MW-4, SW-3, and SW-5 for compliance monitoring is necessary and that collecting upgradient and cross gradient groundwater and surface water samples from the Site is necessary to assess potential regional sources of nitrates/nitrites, chlorides, and TDS and background water quality. Additionally, Ecology agrees with Kaiser's and Haley & Aldrich's recommendation to deploy pressure transducers in monitoring wells MW-1, MW-3, and MW-4 to continuously monitor seasonal groundwater elevation fluctuations.

The simplified cross sections and updated conceptual site model included in the Assessment Plan are not supported by the boring logs or by site hydrogeologic data collected to date. At this time, Ecology will be retaining the original Site Physical Characteristics in the [Final Cleanup Action Plan](#)² for the Site and the original conceptual site model that was developed during the

¹ <https://apps.ecology.wa.gov/cleanupsearch/document/135311>

² <https://apps.ecology.wa.gov/cleanupsearch/document/9830>

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RI and is reinforced by subsequent site data. Ecology recommends a meeting if Kaiser and Haley & Aldrich would like further discussion about updating the Conceptual Site Model.

Ecology approves the removal of monitoring wells MW-2, MW-5, and MW-7, and seep SW-1 from compliance monitoring. However, Ecology's reasoning for removing these wells from monitoring is because the nitrate and chloride concentrations have been consistently below the Site cleanup levels established in the Site Final Cleanup Action Plan, not because of Kaiser and Haley & Aldrich's proposed Conceptual Site Model.

Lastly, Kaiser expressed the desire to permanently close the Site in 2025 in the Assessment Plan. Per the agreed upon [Consent Decree](#)³ section XXVIII Duration of Decree,

"The remedial program required pursuant to this Decree shall be maintained and continued until Defendant has received written notification from Ecology that the requirements of this Decree have been satisfactorily completed. This Decree shall remain in effect until dismissed by the Court. When dismissed, Section XVIII (Covenant Not to Sue), Section XIX (Contribution Protection), and, if still applicable, Section XXI (Financial Assurances) and Section XXVI (Periodic Review) shall survive."

Ecology stresses that in accordance with Washington Administrative Code chapter 173-340-420(2)(a), periodic reviews will continue to be required every five years to confirm that the remedy, which at this time includes institutional controls, maintenance of the cap over the aluminum black dross (dross), stormwater control, gas venting system, and ongoing monitoring of groundwater with concentrations of Site contaminants of concern (COCs) above cleanup levels, is protecting human health and the environment. As long as Site COCs remain above Site cleanup levels in groundwater and/or surface water downgradient of the landfill, compliance monitoring will be required. Even at such time as cleanup levels in surface and groundwater are met, the institutional controls, maintenance of the cap, stormwater control, and maintenance of the gas venting system will be required in perpetuity.

If you have any questions regarding this letter or if you would like additional information regarding the cleanup of contaminated sites, please contact me at (509) 723-5399 or Kailey.Schrum@ecy.wa.gov.

Sincerely,



Kailey Schrum, P.E.

Site Manager

Toxic Cleanup Program, Eastern Regional Office

³ <https://apps.ecology.wa.gov/cleanupsearch/document/20571>

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cc: Nicholas Acklam, Ecology *NA*
Ivy Anderson, Office of the Attorney General
Keylin Huddleston, Haley & Aldrich, Inc. (via e-mail)
Ecology site file