



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

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

September 28, 2023

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

Re: Supplemental Site Characterization:

- **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:

The Washington State Department of Ecology (Ecology) is contacting you to express concerns over current reported concentrations of chloride and nitrate in groundwater and surface water at the [Heglar Kronquist facility](#)¹ (Site). Ecology is concerned that current reported trends in the concentrations of chloride and nitrate are not protective of human health or the environment under the [Model Toxics Control Act \(MTCA\)](#)², [Revised Code of Washington \(RCW\) Chapter 70A.305](#)³.

In accordance with MTCA regulations set forth under [Washington Administrative Code \(WAC\) 173-340-420](#)⁴ and the mutually signed [Consent Decree No. 13202067-4](#)⁵ (Consent Decree), Ecology is requiring additional site characterization and reporting as described below. This information will enable Ecology to evaluate the nature and extent of chloride and nitrate

¹ <https://apps.ecology.wa.gov/cleanupsearch/site/1135>

² <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Rules-directing-our-cleanup-work/Model-Toxics-Control-Act>

³ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

⁴ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-420>

⁵ <https://apps.ecology.wa.gov/cleanupsearch/document/20571>

downgradient of the Site, associated threats to human health and the environment, and whether additional cleanup actions are needed to mitigate such threats, if present.

Recent Site Characterization

Haley & Aldrich, Inc completed an [Annual Compliance Monitoring report](#)⁶ in April 2023. The analytical results associated with multiple sampling events show chloride concentrations (see Figures 4 and 6) above the Consent Decree Cleanup Level in ground water monitoring well MW-3 and in surface water locations SW-3 and SW-5 (see Figure 3 for sample locations). Additionally, the nitrate concentrations (see Figures 5 and 7) were above the Consent Decree Cleanup Level in ground water monitoring wells MW-3 and MW-4 and in surface water location SW-3. Surface water concentrations appear to be on an increasing trend over the last four sampling events.

Additional Site Characterization

As per Consent Decree, Ecology reserves the right to require further remedial action at the Site under appropriate circumstances. After reviewing the results from the April 2023 Annual Compliance Monitoring report, Ecology is requesting sufficient information be collected and evaluated in groundwater and surface water to determine the potential causes for the recent degradation in downgradient groundwater quality and inform an assessment of the effectiveness of the remedy. The information should include, but not be limited to the following:

1. A thorough evaluation and determination that all Institutional Controls set forth in the Consent Decree are being followed.
2. A thorough evaluation of the existing multi-layered cap enhancement and determination of its condition and effectiveness.
3. Return to a quarterly compliance monitoring schedule at Site groundwater and surface water monitoring points, and to ensure that stormwater systems are working as designed.

Required Actions

Ecology is requiring the additional site characterization and a status update with a plan and timeline to address the observed surface water and groundwater contamination, due within 60

⁶ <https://apps.ecology.wa.gov/cleanupsearch/document/127047>

days from the date of this letter. Please submit a hard copy of the reports to the recipient listed below, along with an electronic version.

Additionally, in accordance with [WAC 173-340-840 \(General Submittal Requirements\)](#)⁷, data generated shall be submitted simultaneously in both a written and electronic format. Please ensure that data generated during site activities is submitted pursuant to this policy. Additional information on submitting data is available at the following website: [EIM submit data - Washington State Department of Ecology](#)⁸.

Contact Information

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

Sincerely,



Kailey Schrum, P.E.
Site Manager
Toxic Cleanup Program, Eastern Regional Office

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

⁷<https://app.leg.wa.gov/wac/default.aspx?cite=173-340-840>

⁸<https://ecology.wa.gov/research-data/data-resources/environmental-information-management-database/eim-submit-data>