

Monthly Progress Report

May 20, 2024

To: Sarah Penfield, Washington State Department of Ecology
From: Rebecca Desrosiers and Nicole Forsberg, Anchor QEA
cc: Kristin Gaines and Cheryl Vezzani, Northwest Alloys, Inc.

Re: Former Reynolds Metals Remediation – Monthly Progress Report, April 2024

Per Section XI of the Consent Decree (CD) issued by the State of Washington Cowlitz County Superior Court on December 14, 2018, Anchor QEA, is providing the following monthly progress report on behalf of Northwest Alloys, Inc. (NWA). This monthly progress report describes the actions taken during the previous month to implement the requirements of the CD. This monthly progress report also summarizes construction progress as outlined in the *Construction Quality Assurance Plan*, Appendix O to the *Final Engineering Design Report, Version 2* (Final EDR; Anchor QEA 2023a), approved by the Washington State Department of Ecology (Ecology) on April 14, 2023.

A. List of on-site activities that have taken place during the month

A photograph log of construction activities is included in Attachment A.

- **Installation and maintenance of temporary controls and facilities**
 - Installation and maintenance of temporary erosion and sediment control (TESC) best management practices (BMPs)
 - Envirocon, Inc.,¹ performed site-wide dust suppression control.
 - Observations and monitoring of performance for TESC BMPs
 - Envirocon performed daily stormwater inspections, as documented in their construction stormwater site inspection forms, and maintenance on existing TESCOs.
 - Changes or improvements to temporary access and staging facilities
 - Envirocon received, inspected, and stockpiled import select fill material at the East Staging Area.
 - Temporary facilities installed
 - No temporary facilities were installed.
 - Installation and maintenance of stormwater control facilities and management of remediation water

¹ Multiple entities were hired by NWA to complete the cleanup. Envirocon is the prime contractor hired by NWA to conduct the remediation work. They have hired several subcontractors who are sometimes mentioned in this report, including Northwest Hydro-Mulchers, Inc.; Denbeste Water Solutions; and NW Lining. Anchor QEA is assisting NWA in implementing the *Construction Quality Assurance Plan* (Appendix O to the Final EDR [Anchor QEA 2023a]).

- The Facility 77 extension tank was used to store remediation water from the East Landfill and West Landfill pump stations collected during high rainfall days. Remediation water is evaluated for fluoride and processed per National Pollutant Discharge Elimination System (NPDES) permit condition S1.E.
- Remediation water above 45 ppm fluoride was treated and discharged through Facility 71.
- Problems encountered while operating temporary water control facilities
 - None this period.
- Compliance with permit requirements for managing remediation water
 - As required by the NPDES permit, wastewater treatment plant (WWTP) influent and effluent were sampled in accordance with the *AKART Study Plan for Treatment of Remediation Water at Facility 71* (AKART Study Plan; Anchor QEA 2023b). All remediation water collected over the winter was below 45 ppm fluoride, so no additional water was treated in WWTP.
- Deviations from project design documents
 - There were no deviations from project design documents.
- **Ground improvement**
 - Work was completed in June 2023.
- **Stormwater infrastructure**
 - None this period.
- **Excavation, consolidation, and backfilling**
 - **West Landfill and Site Unit 2**
 - Work was completed in September 2023.
 - **Site Unit 8, Site Unit 10, and East Landfill No. 1**
 - Work in Site Unit (SU) 8 and SU10 was completed in September 2023.
 - Temporary cap of East Landfill No. 1 was completed in September 2023.
 - The seven settlement monuments within East Landfill No. 1 were surveyed by Envirocon on April 17, 2024.
 - **Site Unit 9, Site Unit 11, and Diesel Aboveground Storage Tank (AST) Area**
 - Work was completed in October 2023.
- **Cap placement**
 - Refer to the previous West Landfill and East Landfill discussions.
- **Permeable reactive barrier installation**
 - There were no activities this period.

B. Detailed description of any deviations from required tasks not otherwise documented in project plans and specs or amendment requests

None.

C. Description of all deviations from the Scope of Work and Schedule (Exhibit C) during the current month and any planned deviations in the upcoming month

None.

D. For any deviations in schedule, a plan for recovering lost time and maintaining compliance with the schedule

None.

E. Summary of all environmental data received by Owner during the past month

None.

F. (At Ecology's request) All raw data including laboratory analyses and an identification of the source of the sample

None.

G. A list of deliverables for the upcoming month if different from the schedule and a list of deliverables submitted during April.

Table 1
Deliverables for Upcoming Month or Currently Pending

Deliverable	Submittal Date
Compliance Monitoring and Contingency Response Plan	Pending Ecology comments

Table 2
Deliverables Submitted in April

Deliverable	Submittal Date
None	N/A

H. References

Anchor QEA, 2023a. *Final Engineering Design Report, Version 2*. Former Reynolds Metals Reduction Plant – Longview. Prepared for Northwest Alloys, Inc. March 2023.

Anchor QEA, 2023b. *AKART Study Plan for Treatment of Remediation Water at Facility 71*. Prepared for Northwest Alloys, Inc. – Longview. May 2023.

Attachment A

Construction Photograph

Photograph 1
East Staging Area



Delivery and maintenance of import select fill at East Staging Area