

Monthly Progress Report

December 16, 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, November 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 2023), approved by the Washington State Department of Ecology (Ecology) on April 14, 2023.

All remedial construction is now complete. NWA requests termination of monthly progress reports. The draft *Project Completion Report* will be submitted for Ecology's review in March 2025, per CD requirements. Long-term monitoring is expected to commence during first quarter 2025.

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 of groundwater monitoring wells**
 - Cascade Environmental, with oversight from Anchor QEA, completed installation of groundwater wells for long-term monitoring. Monitoring well development is expected to be completed by December 6, 2024.
- **Installation and maintenance of temporary controls and facilities**
 - Installation, maintenance, and removal of temporary erosion and sediment control (TESC) best management practices (BMPs)
 - Envirocon, Inc.,¹ performed site-wide dust suppression control and removal of TESCs.
 - Observations and monitoring of performance for TESC BMPs

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.; Hargrove Fence Co.; and Northwest Linings & Geotextile Products, Inc. Anchor QEA is assisting NWA in implementing the *Construction Quality Assurance Plan* (Appendix O to the Final EDR [Anchor QEA 2023]).

- 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 and crushed surfacing gravel material in the East Staging Area.
 - Envirocon completed grading and restoration of site access roads.
- Temporary facilities
 - Envirocon completed demobilization of fuel tanks and office trailers.
- Compliance with permit requirements for managing remediation water
 - No remediation water was collected or processed during this period.
- 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, Site Unit 2, and U-Ditch**
 - Work within the West Landfill and Site Unit (SU) 2 was completed in September 2023.
 - Final regrading of the U-Ditch was completed in July 2024.
 - Restoration of the areas within and surrounding the West Landfill was completed in October 2024.
 - **Site Unit 8, Site Unit 10, and East Landfill No. 1**
 - Work in SU8 and SU10 was completed in September 2023.
 - A temporary cap of East Landfill No. 1 was completed in September 2023.
 - A final survey of the seven settlement monuments within East Landfill No. 1 was completed by Envirocon in April 2024.
 - Construction of East Landfill No. 1 was completed in October 2024.
 - **Site Units 3 through 5 and East Landfill No. 2**
 - Site Units 3 through 5
 - Backfill activities within SU5 and SU4 (excluding the portion of SU4 within the limits of SU3) were completed in October 2024.
 - Envirocon completed placement and compaction of select fill and crushed gravel surface material in SU3 and the portion of SU4 within SU3.

- East Landfill No. 2
 - Envirocon completed construction of the access road along the south and east sides of the landfill.
 - Construction of East Landfill No. 2 was completed in October 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**
 - Construction of the permeable reactive barrier (PRB) was completed in August 2024.
 - Envirocon completed housekeeping and restoration work within PRB and surrounding areas.

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 November.

Table 1
Deliverables for Upcoming Month or Currently Pending

Deliverable	Submittal Date
Compliance Monitoring and Contingency Response Plan	Mid-December 2024

Table 2
Deliverables Submitted in November

Deliverable	Submittal Date
None	N/A

H. Reference

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

Attachment A

Construction Photographs

Photograph 1
Site Unit 3



Placement and compaction of select fill

Photograph 2
East Landfill No. 2



Access road construction between landfill and railroad

Photograph 3
West Landfill and PRB Access



Restoration and regrading of Dike Road

Photograph 4
PRB and Closed Black Mud Pond



Restoration along Segment 2 alignment