

# Monthly Progress Report

September 18, 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, August 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.

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

A photograph log of construction activities is included in Attachment A. Representatives from Ecology visited the project on August 19, 2024, and inspected several project elements.

- **Installation and maintenance of temporary controls and facilities**
  - Installation and maintenance of temporary erosion and sediment control (TESC) best management practices (BMPs)
    - Envirocon, Inc.,<sup>1</sup> 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 TESC.
  - Changes or improvements to temporary access and staging facilities
    - Envirocon received, inspected, and stockpiled import pea gravel and coarse sand at the West Staging Area.
    - Supersacks of activated alumina were transferred from NWA storage facilities and to the East Staging Area and Permeable Reactive Barrier (PRB) Staging Area.

---

<sup>1</sup> 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.; DeWind One-Pass Trenching; Tsunami Mixing; 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]).

- Tsunami Mixing continued mixing and stockpiling reactive backfill for use in Site Unit (SU) 3.
  - Mixing equipment was relocated from the East Staging Area to the PRB Staging Area.
- Temporary facilities
  - No new temporary facilities were installed.
- 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 SU2 was completed in September 2023.
    - Final regrading of the U-Ditch was completed in July 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.
    - Northwest Linings & Geotextile Products, Inc., completed installation of liner and geotextile components of the East Landfill No. 1 in June 2024.
  - **Site Units 3 through 5 and East Landfill No. 2**
    - Envirocon completed excavation within SU3 and SU5 and removed vegetation along the perimeters of the SU4 ditches. Waste material removed from SU3 and SU5 was consolidated within East Landfill No. 2.
  - **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**
  - Envirocon completed preparation work within the limits of the PRB.
  - Coarse sand and pea gravel were pre-mixed by Tsunami Mixing. Activated alumina was combined with pre-mixed, non-reactive media immediately prior to delivery into the hopper of the trencher.

- Installation of PRB segments 1 and 2 was completed by Dewind One-Pass Trenching.
- Anchor QEA conducted material sampling and testing per the *Construction Quality Assurance Plan*.

**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 August.**

**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 August**

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**  
**East Staging Area**



Mixing SU3 reactive backfill

**Photograph 2**  
**Site Unit 3**



Excavation along western extents

**Photograph 3**  
**Site Unit 3**



Excavation along eastern extents

**Photograph 4**  
**East Landfill No. 2**



Consolidation of waste material excavated from SU3 and SU5 into East Landfill No. 2



**Photograph 5**  
**West Staging Area**



Pre-mixing coarse sand and pea gravel for the PRB

**Photograph 6**  
**Permeable Reactive Barrier**



One-pass trenching installation – segment 1



**Photograph 7**  
**Permeable Reactive Barrier**



One-pass trenching installation – segment 2