

# Monthly Progress Report

November 20, 2023

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

## **Re: Former Reynolds Metals Remediation – Monthly Progress Report, October 2023**

Per Section XI of the Consent Decree (CD) issued by the State of Washington Cowlitz County Superior Court on December 14, 2018, Anchor QEA, LLC, 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.,<sup>1</sup> performed site-wide dust suppression control.
    - Silt fencing was repaired along the southern edge of Site Unit (SU) 7 (East Landfill No. 1)
  - 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 topsoil material at the East Staging Area.
    - Envirocon ground stockpiled wood in West Staging Area.
  - Temporary facilities installed

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<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 mentioned in this report, including Keller Management Services, LLC; Northwest Hydro-Mulchers, Inc.; Denbeste Water Solutions; and Catworks Construction. Anchor QEA is assisting NWA in implementing the *Construction Quality Assurance Plan* (Appendix O to the Final EDR [Anchor QEA 2023a]).

- JH Kelly installed the temporary connection from the 1-million-gallon water storage tank to the existing Facility 77 sump.
- Installation and maintenance of stormwater control facilities and management of remediation water
  - Remediation water 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 National Pollutant Discharge Elimination System (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). Approximately 267,000 gallons of remediation water was treated through the WWTP. Option 2 in Table 2 of the AKART Study Plan was applied, and three composite samples were collected over 6 days.
- Deviations from project design documents
  - There were no deviations from project design documents.
- **Ground improvement**
  - Work was completed in June 2023.
- **Stormwater infrastructure**
  - Precast concrete overflow weir vault was installed at West Pump Station.
  - Installation of 25 linear feet of 18-inch-diameter corrugated polyethylene pipe (CPE) was completed to connect the West Pump Station to the U-Ditch.
  - Quarry spalls were installed as scour protection at the U-Ditch from the West Pump Station overflow vault.
  - Installation of permanent connection from the force main to the existing Facility 77 manifold was completed.
  - Final grading of gravel pad surrounding the West Pump Station was completed.
  - GPS and survey control activities were completed.
- **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 SU8 and SU10 was completed in September 2023.
    - Temporary cap of East Landfill No. 1 was completed in September 2023.
  - **Site Unit 9, Site Unit 11, and Diesel Aboveground Storage Tank (AST) Area**
    - Envirocon performed additional excavations in SU9 and SU11.

- Anchor QEA conducted performance soil sampling in these excavations per Appendices C, D, and P of the Final EDR (Anchor QEA 2023a). Samples were sent to Apex Laboratories, LLC, for analysis.
- Removed material was loaded into export trucks and transported for off-site disposal at the Waste Management Landfill in Hillsboro, Oregon. Export trucks were weighed before departure, and weight tickets were provided to Anchor QEA.
- Analytical data will be included in the Completion Report.
- Once analytical data at all sample locations met cleanup levels, SU9 and SU11 were backfilled with select fill and 3 inches of imported crushed gravel surface material above imported select fill.
- The diesel AST area met cleanup levels and was backfilled with select fill in accordance with Appendix P of the Final EDR (Anchor QEA 2023a).
- **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**

Performance soil analytical data for SU9, SU11, and the diesel tank were received. These data will be included in the Completion Report. All Known, Available, and Reasonable Technologies (AKART) sampling data were included in the October 2023 NPDES Discharge Monitoring Report.

**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 October.**

**Table 1**  
**Deliverables for Upcoming Month**

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

**Table 2**  
**Deliverables Submitted in October**

Deliverable	Submittal Date
None	N/A

**H. References**

Anchor QEA (Anchor QEA, LLC), 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 Photographs

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**Photograph 1**  
**East Landfill No. 1**



Repair of silt fencing along southern edge of East Landfill No. 1 (Site Unit [SU] 7).

**Photograph 2**  
**West Staging Area**



Envirocon mobilizing wood grinding equipment in West Staging Area.



**Photograph 3**  
**1-Million-Gallon Water Storage Tank**



Installation of temporary connection from water storage tank to Facility 77.

**Photograph 4**  
**West Pump Station**



Installation of overflow vault and 18-inch corrugated polyethylene pipe (CPE).

**Photograph 5**  
**Facility 77**



Permanent connection from force main to Facility 77 manifold.

**Photograph 6**  
**West Pump Station**



Final grading of gravel pad surrounding West Pump Station.



**Photograph 7**  
**Site Unit 9**



Placement of select fill in SU9.

**Photograph 8**  
**Site Unit 11**



Additional excavation in SU11.

**Photograph 9**  
**Site Unit 11**



Final grading and compaction of crushed gravel surface material in SU11.