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## ALUMINUM RECYCLING CORPORATION

### DRAFT CLEANUP ACTION PLAN

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The Washington State Department of Ecology (Ecology) has completed the Draft Cleanup Action Plan (DCAP) for the Aluminum Recycling Corporation Site (Site) located at East 3412 Wellesley Avenue, Spokane, WA. The Site is generally bounded by Wellesley Avenue to the north, Freya Street to the east, and Market Street to the west (Figure 1).

The purpose of the DCAP is to select cleanup actions and specify the standards and other requirements for the cleanup action under the Model Toxics Control Act (MTCA) (Chapter 173-340 WAC). The Potentially Liable Persons (PLPs) at the Site, Burlington Northern Santa Fe Railway (BNSF) and Kaiser Aluminum and Chemical Corporation (Kaiser) will be responsible for carrying out the cleanup actions specified in the DCAP.

Ecology invites the public to review and comment on the DCAP which is available for review at the repositories listed in the shaded box on the right. The box also indicates where comments may be sent and additional information obtained.

**Public comments will be accepted April 14, 2000 through May 15, 2000.**

#### SITE BACKGROUND

An aluminum dross reprocessing facility was operated by Hillyard Processing Company on the land leased from Burlington Northern Railroad Company. Hillyard Processing Company reportedly began aluminum reprocessing at the Site in 1954, and the activities continued through several operator changes. Aluminum Recycling Corporation was the latest operator of the facility until 1987 when the property was abandoned.

The facility processed aluminum skim, called white dross, in a batch process. The white dross was obtained from aluminum smelters, including Kaiser, and aluminum scrap materials from various sources. This secondary processing of white dross involved the addition of sodium and potassium chloride salts. The process extracted molten aluminum metal, which was poured into ingots and sold. The high chloride waste resulting from this process is known as black dross, and it remains on Site. In addition, non-reprocessed white dross waste was deposited and is still on Site. An estimated 65,000 cubic yards of these wastes occurs in piles A through R and in an abandoned pit on Site (Figure 2).

Ecology completed an inspection in December 1987 and the Site was ranked using the Washington

Ranking Method (WARM) in August of 1991. In June 1996, the PLPs prepared several reports that indicated that the dross contained high concentrations of chloride,

fluoride, and nitrogen compounds. Chloride, fluoride, and nitrate were also found in groundwater at concentrations exceeding drinking water standards. The Agreed Order between Ecology and BNSF to conduct a Remedial Investigation/Feasibility Study (RI/FS) was signed on November 16, 1998 after a 30 day public comment period.

The RI/FS was completed in November 1999 to investigate the nature and extent of contamination at the Site and determine the potential cleanup actions. Results of Site investigations are documented in the Final Remedial Investigation/Feasibility Study for the Hillyard Dross Site, East 3412 Wellesley Avenue, Spokane, WA.

Results of soil, dross, and groundwater sampling showed that: groundwater is contaminated with chloride, fluoride, nitrate, and nitrite; soil contains elevated levels of metals; and dross is the source of these contaminants.

The Feasibility Study evaluated three different cleanup options for the Site: no action, on-site containment, and off-site disposal. The PLP's proposed cleanup alternative was on-site containment.

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Ecology has completed work on the DCAP, which describes the selected cleanup action, specifies cleanup standards, and identifies other requirements. Ecology has determined that the contaminants to be monitored are: chloride, fluoride, nitrate and nitrite for groundwater, and lead for soils. The levels of these contaminants in each media will determine when the Site is considered clean.

MTCA specifies the following criteria for selecting cleanup actions. A cleanup action must:

- be protective of human health and the environment;
- comply with cleanup standards and applicable state and federal laws;
- provide permanent solutions, to the maximum extent practicable, in a reasonable time frame;
- include monitoring to ensure compliance; and
- consider comments on the DCAP.

The cleanup action selected by Ecology includes the following elements:

- regrading of Site materials;
- installation of a multi-media cover system to prevent infiltration through the dross;
- cover system and fence maintenance;
- quarterly monitoring of groundwater;
- institutional controls, including fences, signs, and restrictive covenants; and
- five year reviews to determine the effectiveness of the selected remedy.

#### **WHAT HAPPENS NEXT?**

Ecology will review all written public comments on the DCAP, and if necessary, the document will be modified. A Responsiveness Summary addressing comments will be prepared, if appropriate.

#### **ECOLOGY WANTS YOUR COMMENTS!**

The public comment period represents an opportunity to have your ideas and comments heard by Ecology.

- **You may review and comment on the DCAP April 14, 2000 through May 15, 2000.**
- Copies of the DCAP are available for public review at the repositories listed in the shaded box on page one of this fact sheet.
- To review more detailed Site documents than those in the information repositories, contact Johnnie Harris of Ecology at (509) 456-2751 to schedule an appointment.
- **Files may be reviewed at Ecology in Spokane Monday through Thursday, 8-5 p.m. by appointment only.**
- **Please submit written comments by May 15, 2000** to Ms. Sandra Treccani, Site Manager, at the Ecology address listed in the shaded box on page one.