

## Report about Investigation of Dross Contamination Available for Review and Comment

The Washington State Department of Ecology (Ecology) invites you to review and comment on a draft report for the Aluminum Recycling Trentwood site. The site is located at 2317 North Sullivan Road in the City of Spokane Valley, Washington (see Fig.1)

Ecology entered into an Agreed Order with Union Pacific Railroad (UPRR) to conduct a Remedial Investigation and Feasibility Study (RI/FS) at the site. The purpose of the Remedial Investigation was to determine the extent of contamination. The Feasibility Study evaluated possible cleanup options. The results of the investigation and study are combined into a Remedial Investigation and Feasibility Study Report now available for review and comment.

The primary contaminants of concern assessed in the report include various metals, chloride, fluoride and nitrogen compounds. Both soil and groundwater were evaluated for these contaminants. Cleanup levels used to assess groundwater at the site were the most conservative state and federal values because groundwater at the site is part of the Spokane Valley Rathdrum Prairie Aquifer. Results of the studies indicate groundwater has not been impacted by contaminated soils.



Looking North at the Site from Sullivan Road

You are invited to:

- **Review** the Remedial Investigation and Feasibility Study Report at the locations listed in the box on the right.
- **Send** your comments to Sandra Treccani at Ecology from **June 25 through July 25, 2012**. The box at the right has her contact information.

## Comments Accepted

June 25 through July 25, 2012

**ADA accommodations** or documents in an alternate format, call Carol Bergin 509/329-3546 (voice), 711 (relay service), or 877-833-6341(TTY).

**Para asistencia en Español**  
Richelle Perez 360/407/7528

### Submit Comments and Technical Questions to

Sandra Treccani  
WA Department of Ecology  
Toxics Cleanup Program  
4601 N. Monroe  
Spokane WA 99205-1295  
509/329-3412 or satr461@ecy.wa.gov

### Public Involvement Questions

Carol Bergin  
WA Department of Ecology  
(see address above)  
509/329-3546 or cabe461@ecy.wa.gov

### Document Review Locations

WA Department of Ecology  
Kari Johnson, Public Disclosure  
4601 N. Monroe  
Spokane, WA 99205-1295  
Call for an appointment 509/329-3415

Spokane Valley Public Library  
12004 E. Main, Spokane Valley, WA 99216  
509/893-8400

Ecology's Toxics Cleanup Website  
<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=1081>

Facility Site ID No. 628  
Cleanup Site ID No. 1081  
Publication No. 12-09-028

## Site Overview

Aluminum Recycling Trentwood lies northeast and across the river from the Spokane Valley mall, several businesses and two hotels. Center Place community center, Mirabeau Meadows Park and Mirabeau Springs are also across the river to the west. A park lies adjacent to the site on the south, and hiking trails are found near the site and adjacent to the property.

Beginning in 1979, the site was used to process and store aluminum materials. There are two types of aluminum processing, primary and secondary. Primary processing puts bauxite ore through a multi-phase process to create aluminum. The byproduct of primary processing is white dross.

Secondary processing uses scrap aluminum and/or white dross to create aluminum by adding sodium and potassium chloride salts. The byproduct of secondary processing is black dross. White dross contains high aluminum content while black dross contains high levels of chloride, fluoride, and nitrate. Dross can be used in the production of aluminum sulfate, which also produces a solid byproduct.

The site was used to recycle aluminum cans and white dross into secondary aluminum that was sold. One pile of dross material was removed from the site in approximately 1986.

The other stockpile on-site was thought to contain only white and black dross, but the RI results indicate that the majority of the stockpile consists of aluminum sulfate and mineral oxides from aluminum sulfate production that occurred after approximately 1986. The amount of material in the stockpile is estimated at 70,000 cubic yards and covers nearly three acres, including property owned by UPRR, Pentzer Venture Holdings, Department of Transportation, and Department of Parks.

The Spokane Regional Health District completed an assessment of the property in February 2008 and ranked the site a two on Ecology's Hazardous Sites

List. The Hazardous Sites List is a record of contaminated sites throughout the state that are ranked on a scale of one to five. One represents the greatest potential threat to human health and the environment; five represents the least potential threat.

## Cleanup Alternatives Evaluated

Initially five alternatives were considered for cleanup of soil at the site. These included no action, capping of contaminated soil, relocating the stockpile and capping the adjacent property, removal of the stockpile and off-site disposal and recycling or reusing the stockpile material.

Three of these alternatives were evaluated in more detail:

Alternative 1: Capping a Combined Stockpile in Place. Stockpile material from the adjacent Department of Transportation and Parks Department properties would be consolidated into the main stockpile. The combined stockpile would be graded and capped with a protective membrane that would prevent rain, snow, airborne materials, humans, and wildlife from coming into contact with the contaminated soil.

Alternative 2: Stockpile Relocation and Capping. The Stockpile material would be moved to an adjacent Union Pacific Railroad property and capped. Moving the material to this new location would create a new landfill that would be subject to several regulatory laws and permits.

Alternative 3: Removal of the Stockpile to an Off-Site Landfill. The stockpile would be moved to an off-site landfill permitted to accept this waste.

A preferred alternative is under discussion by Union Pacific Railroad. Any chosen alternative will be based on the detailed analysis of the site. Data indicate the stockpile is stable, is not impacting groundwater, and has a low possibility of leaching contaminants into the groundwater.

After public comment on the Remedial Investigation and Feasibility Study Report, Ecology will determine which alternative is best for the site and present the decision in a document called a Draft Cleanup Action Plan. Ecology will consider public comments on the DCAP before it becomes final.

### What Happens Next?

Ecology will review and consider all comments received by July 25, 2012. The Remedial Investigation and Feasibility Study Report may be modified based upon public comments. As the cleanup moves forward and new documents are developed, the public will be notified of additional comment periods.

### Why This Cleanup Matters

- Groundwater at the site is part of the Spokane Valley Rathdrum Prairie Aquifer that provides drinking water to approximately 500,000 residents.
- The Remedial Investigation indicated there are no impacts to the groundwater from contaminated soil.
- The Feasibility Study identified and evaluated cleanup options for soil.
- Information from the investigation and study will help Ecology choose the best method to clean up the site.

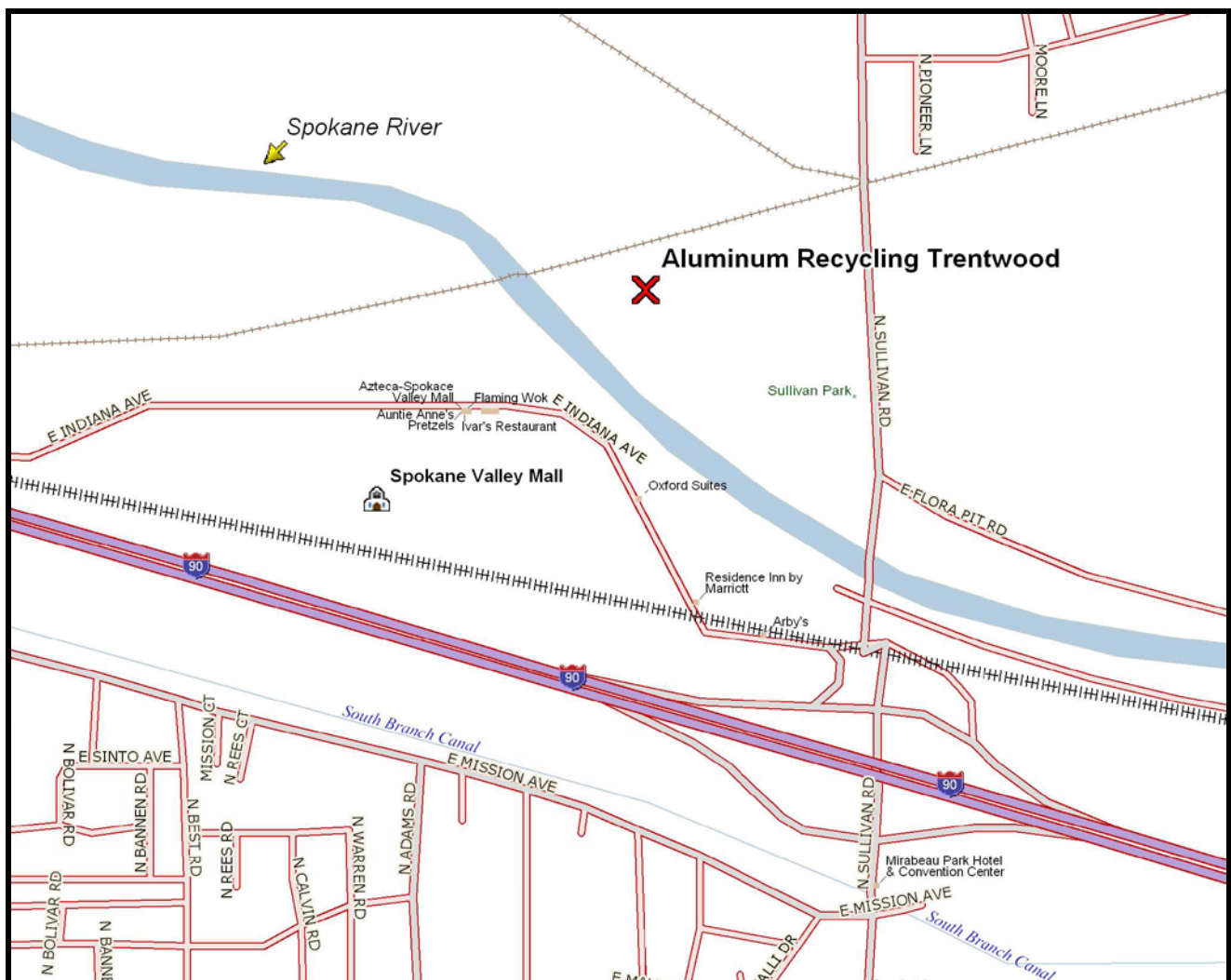


Figure 1