

RESPONSIVENESS SUMMARY

Revised Draft Cleanup Action Plan/Consent Decree 1820131208

Reynolds Metals Aluminum Smelter Site

Public Comment Period

August 14, 2018 – September 14, 2018

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Introduction

This document addresses the comments received by the Department of Ecology (Ecology) during the public comment period on the Revised Draft Cleanup Action Plan (CAP) and Consent Decree (CD) for cleanup of contamination at the former Reynolds Metals Aluminum Smelter in Longview, Washington. The CD is a legal instrument that requires site cleanup and the CAP specifies cleanup standards and how the cleanup will be done.

Ecology published notice of an opportunity to comment on the revised draft CAP and CD in *The (Longview) Daily News* on August 14, 2018 and Ecology's Site Register on August 16, 2018. In the notice, Ecology invited public review of the Revised Draft CAP and CD and provided a 30-day public comment period. The deadline for submittal of written comments was September 14, 2018.

A previous comment opportunity was held in 2016. Comments received during that comment opportunity resulted in changes to the documents. The CD and CAP, including the Compliance Monitoring and Contingency Response Plan (CMCRP), were revised in response to the 2016 comments. While the changes were narrow in scope, Ecology determined that they were significant enough to warrant another opportunity for public comment.

During the latest comment opportunity, a total of 2452 comments were received by Ecology. Comments appear in italicized text below, followed by Ecology's response.

Comments and Responses

Comment 1:

(The following comment was received from 2449 people. Some commenters included additions to the standard comment below which emphasized the importance of protecting the Columbia River as a natural resource, protecting the community and future generations, holding liable parties accountable, or taking action on the cleanup. The entire text of the comments received is available at: <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=11796>)

Dear Washington Department of Ecology:

I support thorough and effective cleanup of the former Reynolds Aluminum Site in Longview, WA.

Washington Department of Ecology's (Ecology) revised draft Cleanup Action Plan and Consent Decree include important changes to protect people, fish and other aquatic life, and wildlife.

In particular, I support:

- *Ecology's decision to revise the Compliance Monitoring and Contingency Response Plan to include porewater monitoring and contingent sediment bioassays along the Columbia River shoreline adjacent to the former Reynolds Metals Plant to ensure protection of aquatic species.*

- *Ecology's decision to use a narrative surface water cleanup level of 'no adverse effects on the protection and propagation of fish and other aquatic life' and the requirement that the responsible parties use bioassays to make this demonstration.*

I remain concerned, however, that Ecology has not taken steps to ensure that Alcoa and Millennium cleanup the site prior to any redevelopment. Ecology must ensure that site redevelopment does not undermine effective, active cleanup.

Although the former Reynolds site contains complex pollution issues, it remains unclear why cleanup has languished for so long relative to other former aluminum smelters on the Columbia River. Moving forward, I urge Ecology to hold the site's owner, Alcoa, and operator, Millennium, accountable for cleanup.

Ecology Response to Comment 1:

Ecology notes the commenters' support for the revisions to the CAP/CD and agrees that the expeditious cleanup of the site is important to protect human health and the environment.

The process for cleanup of contamination is separate from future development or redevelopment of the site. Ecology is committed to working with the liable parties to complete the cleanup as quickly as possible while ensuring that it meets the requirements in the law. The purpose of the CD is to hold the liable parties accountable for completing the cleanup in accordance with the CAP.

The time it takes to investigate and cleanup a large industrial site is different in each case and depends on many factors, including the complexity of environmental issues, the level of cooperation from liable parties, the level of public interest and involvement, the speed of permitting processes, and the availability of the department's resources.

Comment 2:

Thank you for allowing me to comment on the most recent changes to the draft Cleanup Action Plan and draft Consent Decree for the Reynolds Metals Cleanup.

The Department of Ecology is to be commended for all your work getting us to this point where there can finally be a completed cleanup for this site. The Yakama Nation must also be applauded for their persistence in assuring that fish and other aquatic species are protected now and in the future.

Please proceed in finalizing this process and holding Alcoa and Millennium accountable for the cleanup.

Ecology Response to Comment 2:

Comment noted.

Comment 3:

The Yakama Nation appreciates the Washington Department of Ecology working with us on an adaptive solution to protect aquatic receptors in the Columbia River. The additional monitoring requirements and fluoride screening level offers a viable path forward for evaluating the remedies protectiveness of aquatic resources but Ecology will need to continue to collaborate with Yakama Nation on the details of Cleanup Action Plan (CAP) implementation. Additionally, we understand that the future use of this facility is a separate process but it must be noted that we expect a complete cleanup before any sort of new development is implemented at the site. Please see our specific comments on the CAP and appendices below:

Specific Comments:

Appendix A Section 3.5 states, "Prior to development of the SQAPP, a Sampling Location Study Work Plan will be developed and submitted to Ecology for approval. The Sampling Location Study Work Plan will describe the site-specific data that will be collected and/or evaluated to select post-construction porewater monitoring locations and timing such as groundwater monitoring data, tidal information, and video documentation of tidal changes and active seeps." Yakama Nation must be involved in the early stages of this plan to ensure our thoughts are considered early in the process and unnecessary delays are avoided. We would like to clarify that we expect that the Sampling Location Study Work Plan's discussion of porewater monitoring locations to include the details on the depth of sampling. Many areas of the Columbia River contain large amounts of riprap and true porewater does not exist until you have reached point within the benthos underneath the riprap. Section 3.5.5 states, "NMDS samplers will be placed within the sediment at the base of the bioactive zone 10 centimeters (cm) below the mudline." Defining exact location of the mudline is likely to be a complicated issue due the heterogeneous nature of the Columbia River. We look forward to working on a collaborative solution to this issue.

Ecology Response to Comment 3:

Ecology agrees that it will be important to involve the Yakama Nation in development of the Sampling Location Study Work Plan.

As noted in the comment, future development or redevelopment of the site is a separate process from the cleanup. Ecology is committed to working with the liable parties to clean up this site as quickly as possible.

Comment 4:

I live along the Columbia River and beg you to do the right thing and insist on clean up of the Millennium Coal Site. The documented contamination affects the health of everyone who eats from and/or enjoys recreation in its waters.

Ecology Response to Comment 4:

Comment noted.