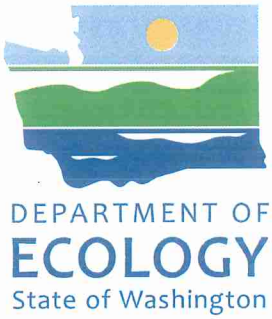

RESPONSIVENESS SUMMARY

KAISER TRENTWOOD SITE'

CSID 7093
FSID 53481373

Amendment No. 1 to the 2005 Agreed Order No 2692
Remedial Investigation Addendum for the West Discharge Ravine
Focused Feasibility Study for the West Discharge Ravine
2 State Environmental Policy Act (SEPA) Checklists and Determinations of Non-Significance (DNS) for Proposed Interim Actions

PUBLIC COMMENT PERIOD
AUGUST 20 THROUGH SEPTEMBER 19, 2012

Prepared by:

WASHINGTON DEPARTMENT OF ECOLOGY
Eastern Regional Office
4601 N. Monroe Street
Spokane, WA 99205-1295

September 2012

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The Washington Department of Ecology (Ecology) held a 30-day public comment period from August 20 through September 19, 2012 for the following documents:

- Amendment No. 1 to the 2005 Agreed Order No. 2692
- Remedial Investigation Addendum for the West Discharge Ravine
- Focused Feasibility Study for the West Discharge Ravine
- Two State Environmental Policy Act (SEPA) Checklists and Determinations of Non-Significance

The Amendment to the 2005 Agreed Order requires the performance of interim actions at the Site. The SEPA Checklists and the Determinations of Non-Significance are for the proposed interim actions. The Remedial Investigation Addendum for the West Discharge Ravine provided the results of additional investigations for PCBs conducted in this area. Remedial actions based on the results of the additional studies are proposed in the Focused Feasibility Study for the West Discharge Ravine. The recommended action in the Focused Feasibility Study is proposed as one of the interim actions to be performed.

The purpose of this Responsiveness Summary is to document Ecology's responses to comments sent to Ecology during the public comment period. Two comments were received by e-mail. The two comments and Ecology's responses to these comments are attached.

Proposed Change

Based on the comments received, Ecology is making a change in the first paragraph, page 6, Exhibit C-A1, Amended Public Participation Plan of Amendment No. 1 to Agreed Order No. 2692. The first paragraph will be changed to (**bold letters** represent added language):

> "Polychlorinated biphenyl's (PCBs) are a group of .....The **commercial** manufacture of PCBs stopped in the United States in 1977 because of evidence they accumulate in the environment and do not breakdown. **Certain PCBs continue to be inadvertently produced as by-products in manufacturing processes such as the production of pigments (diarylide yellow and titanium dioxide white) and silicone rubber tubing. These PCBs can be present in consumer products and can be subsequently introduced into the environment.** They may also cause harmful effects to fish, wildlife, humans and other living organisms,"

Final Documents

With the above change in Exhibit C-A1 of Amendment No. 1 to Agreed Order No. 2692, this document is now final.

No other changes are proposed. Therefore, the following documents are also final:

- Remedial Investigation Addendum for the West Discharge Ravine
- Focused Feasibility Study for the West Discharge Ravine
- Two State Environmental Policy Act (SEPA) Checklists and Determinations of Non –Significance (DNS).

COMMENTS RECEIVED WITH ECOLOGY'S RESPONSE(S)

1. E-mail from Adriane P. Borgias, Water Quality Program, Washington State Department of Ecology, Eastern Regional Office received on September 19, 2012.

Bala, Teresita F. (ECY)

From: Borgias, Adriane P. (ECY)
Sent: Wednesday, September 19, 2012 4:05 PM
To: Bala, Teresita F. (ECY); Knight, David T. (ECY)
Cc: Bellatty, James (ECY)
Subject: Comment on the Kaiser Aluminum project

Teresita,

There is a statement in the Kaiser Amended Agreed Order regarding PCBs that should be corrected:

https://fortress.wa.gov/ecy/gsp/DocViewer.aspx?did=8650

The reason is that the PCB discussion should more accurately reflect the challenges that we are dealing with today in achieving the PCB water quality standards. Recent studies have found that certain PCB congeners are ubiquitous (found almost everywhere) in the environment. The pigments in paints and caulking materials, in particular have been identified as sources: http://srrttf.org/wp-content/uploads/2012/08/Lisa-Rodenburg-Slideshow.pdf

Are you able to make a correction in the order at this time? If so, here is some suggested language:

On page six, first paragraph:

"Polychlorinated biphenyl's (PCBs) are a group of manufactured synthetic chemicals . . . The manufacture of PCBs stopped in the United States in 1977 because of evidence they accumulate in the environment and do not breakdown. . . . They may also cause harmful health effects to fish, etc."

The sentence in should read,

"The **commercial** manufacture of PCBs stopped in the United States in 1977 because of evidence they accumulate in the environment and do not breakdown. **Certain PCBs continue to be inadvertently produced as by-products in manufacturing processes such as the production of pigments (diarylide yellow and titanium dioxide white) and silicone rubber tubing. These PCBs can be present in consumer products and can be subsequently introduced into the environment . . .** They may also cause harmful effects to fish, etc."

If the correction can't be made at this time, then please consider using this language in future discussions about PCB.

Thanks,

Adriane Borgias

Spokane River Water Quality Lead
Washington State Department of Ecology
Water Quality Program - Eastern Regional Office
4601 North Monroe Street
Spokane, WA 99205-1295
(509) 329-3515

Response to Comment no. 1

Thank you. We appreciate your comments. Your suggested change is in Exhibit C-A1, Public Participation Plan, of the Amendment No.1 to Agreed Order No. 2692. We will be incorporating this change in the final document.

2. E-mail from Jacob McCann, Aquatic Resources Division, Washington State Department of Natural Resources, received on September 19, 2012.

Bala, Teresita F. (ECY)

From: McCann, Jacob (DNR)
Sent: Wednesday, September 19, 2012 4:51 PM
To: Bala, Teresita F. (ECY)
Cc: Bergin, Carol (ECY)
Subject: WA DNR Kaiser Trentwood comments

Hi Teresita-

In my initial e-mail re: this proposal, I indicated that DNR did not have any comments because the work was occurring above ordinary high water, and thus not on State-owned Aquatic Lands (SOAL). You clarified that a portion of the proposal for the West Discharge ravine did in fact occur below OHW. Upon further review with our Sediment Management Unit, DNR does have certain concerns/questions if the excavation includes areas beyond ordinary high water:

1) If excavation extends beyond ordinary high water, what methods will be employed to prevent erosion of potentially contaminated soils to the Spokane River/bank destabilization?
2) If remediation activities extend onto SOAL, then sediment management standards (SMS)should be referenced during the development of cleanup goals for that area.
3) Control of stormwater-It looks like currently that stormwater on the site is directed to the WWTP for the most part, with some collecting in a basin and percolating down into the soil. In the case of excavation near and beyond ordinary high water, what method(s) will be used to direct storm water to either treatment or a catch basin rather than in to the Spokane River?

Please consider these comments going forward. An Aquatic Lands Use-Authorization application (JARPA attachment E) will need to be submitted for work below OHW. This can be submitted with the other permit applications as one JARPA, or to prevent delay, can be submitted prior to other permit applications as a stand-alone application.

We appreciate the opportunity to review the subject project, and are encouraged to see continued cleanup actions on the Spokane River. Please let me know if there are any questions.

Thank you,

Jacob McCann
Land Manager, Rivers District
Aquatic Resources Division
Washington State Department of Natural Resources
509-220-3009
Jacob.McCann@dnr.wa.gov
dnr.wa.gov/aquatics

Response to Comment No. 2

Thank you for your comments on the proposed interim actions at the Kaiser Trentwood Site. Your concerns/questions are on the proposed soils excavation at the West Discharge Ravine.

In 2007, the top 10 to 12 feet of soils containing PCBs was excavated in the same area. Since shoring was not used, the extent of the excavation was limited by the stability of the excavation side walls. This additional interim action is to excavate the deeper soils that continue to be potential sources of PCBs in groundwater. As provided for in the

amended Agreed Order, a Work Plan containing an Engineering Design Report will be submitted 45 days after the effective date of this Order for Ecology's review and approval. This document will provide the details of this soils excavation project. A JARPA application will also be submitted in conjunction with this Work Plan. The following are responses to your comments as numbered:

1) Like the 2007 interim actions, temporary erosion and sediment/bank stabilization controls will be utilized. Please note that the contaminated soils to be excavated are deeper soils and surface soils in the project area that are prone to erosion are clean. As proposed, shoring techniques will be employed to support the excavation side walls and the stability of the slopes. The Work Plan/Engineering Design will provide the details.

2) SMS is applicable only to surface soils along the river bank that are below the high water mark since these soils have the potential to come in contact with river water and are considered sediments. Site soils and groundwater cleanup levels are based on the protection of surface water as required under the Model Toxics Control Act (MTCA). The soil cleanup level that is based on the protection of groundwater/surface water is calculated using the 3-phase model. This soil cleanup level is also the sediment concentration protective of surface water. Since there are no available fresh water sediment standards at this time, this soil concentration should be sufficient to be used as the cleanup level for soils that may be considered sediments. Cleanup levels will be finalized in the Cleanup Action Plan.

3) Like the 2007 interim actions, the project will be scheduled during the summer months when stormwater is expected to be infiltrated and runoff prevented from the excavation area. Regardless, additional construction stormwater management measures will be undertaken to protect the Spokane River. This may include the use of berms and silt fences similar to those implemented in the 2007 actions. Details of the stormwater management measures will be discussed in the Work Plan/Engineering Design.