

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [\[HELP\]](#)

1. Name of proposed project, if applicable:

Additional Interim Actions for Groundwater PCB cleanup

2. Name of applicant:
Kaiser Aluminum Washington, LLC
3. Address and phone number of applicant and contact person:
**Brent Downey
Kaiser Aluminum
15000 E Euclid Ave
PO Box 15108
Spokane Valley, WA 99215
(509) 927-6219**
4. Date checklist prepared:
January 20, 2020
5. Agency requesting checklist:
Department of Ecology
6. Proposed timing or schedule (including phasing, if applicable):
Interim Actions will be implemented under a Second Amendment to Agreed Order No. 2692 with the Department of Ecology. The Scope of Work and Schedule contained in the Amended Agreed Order identifies two phases of work to be performed through a series of nine tasks. Implementation of the Scope of Work commences on the effective date of the Second Amendment to Agreed Order No. 2692 and spans an approximately three year time period.
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.
The completion of Interim Actions is expected to eventually result in the preparatrion of a Cleanup Action Plan for the implementation of a final remedy for cleanup.
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.
Under Agreed Order No. 2692 and Amendment No.1 to that Order, numerous study documents (Remedial Investigation/Feasibility Study) and Interim Action Completions Reports have been prepared.
9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.
NPDES Permit No. WA0000892 Variance Application submitted to Department of Ecology on April 30, 2019.
10. List any government approvals or permits that will be needed for your proposal, if known.
Interim Actions will be performed under Amendment No. 2 to Agreed Order No. 2692 once the Amendment becomes effective.
11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this

page. (Lead agencies may modify this form to include additional specific information on project description.)

Interim Actions to be taken are divided into two phases.

The first phase includes the following actions:

- ***Following the necessary field investigations and hydrogeological modeling, expansion of the existing pilot scale level groundwater extraction system into a full scale groundwater extraction network***
- ***A capacity expansion of the treated extracted groundwater discharge system from existing pilot scale capacity to full scale capacity based upon the estimated capacity required for the full scale groundwater extraction network***
- ***Advancement of Ultraviolet Light/Hydrogen Peroxide PCB treatment technology from the current laboratory scale level that has demonstrated substantial PCB destruction efficiency to treatment capacity that is compatible with a full scale groundwater extraction network capacity***
- ***Continue with the assessment of additional potential alternative technologies (Algae Based Treatment Technology and Solvent/Zero Valent Metal Technology) and their potential applicability***
- ***Continue the operation and optimization of the existing pilot treatment system (Walnut Shell Filtration System) while increasing the system target capacity of 50 gallons per minute or higher***
- ***Expand the existing treatment building infrastructure so that it can support the estimated requirements for both treatment technology development and full scale treatment systems***

The second phase includes the following actions:

- ***Preparation of an Interim Action Engineering Design Report for the design, installation, and operation of a full scale pump and treat remediation system***
- ***Upon approval, implementation of the Interim Action Engineering Design Report***
- ***Submittal of Interim Action Performance Reports***

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

Interim Actions to be performed will be on the existing Kaiser Trentwood site at 15000 E Euclid Ave, Spokane Valley. A map showing the approximate area involved in the Interim Actions is attached.

B. Environmental Elements [\[HELP\]](#)

1. Earth [\[help\]](#)

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)?

Existing treatment testing building is generally on ~0% sloping ground. Additional Interim Actions for treatment will be immediately adjacent to this existing area.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Sand and gravel

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Project will involve installation of underground piping within the current 512 acre facility (~3,500 feet of piping) and minor finish grading for treatment system building. The total estimated area of ground disturbed by these activities is approximately 20,000 square feet. All construction related stormwater (if any) will be infiltrated on-site.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

No clearing is required for implementation and other infrastructure is within existing stormwater management areas.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Less than 4,000 to 6,000 square feet of additional building will likely be added to the site.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Treatment building will be within existing stormwater management areas.

2. Air [\[help\]](#)

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Pipeline trenching and minor finish grading may generate minor amounts of localized dust.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

None. Activities within existing facility infrastructure areas.

3. Water [\[help\]](#)

a. Surface Water: [\[help\]](#)

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

The Spokane River is several hundred yard west. No drainage pathways from the treatment building to the river.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

None.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No.

b. Ground Water: [\[help\]](#)

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

Groundwater will be extracted, treated, and re-infiltrated upgradient of the area of groundwater extraction. Groundwater will be extracted from a network of wells located at multiple locations within the PCB impacted groundwater area at the Site and conveyed to a single location for treatment. While final extraction volumes have yet to be determined, the extraction network will be designed to extract groundwater at a rate to be measured against screening levels at the Site

within a reasonable restoration timeframe. The current pilot level extraction rate is approximately 50 gallons per minute. The pump and treat option contained in the Site's Feasibility Study identified an extraction rate of 200 gallons per minute.

After treatment, the extracted groundwater will be re-infiltrated upgradient of the area of groundwater extraction at the Site.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Groundwater treated for PCB will be re-infiltrated upgradient from the extraction area. Since none of the technologies evaluated or currently in use at the pilot level result in non-detectable levels of PCB, any re-infiltrated groundwater will contain some level of PCB. Additional residuals in the treated groundwater will be technology dependent.

Residuals from Walnut Shell Filtration are potentially low concentrations (milligrams per liter levels) of castor oil which is used to absorb PCB from the groundwater and subsequently removed through the walnut shell filtration process. It is assumed that castor oil will be the only additive used for this technology. Castor oil is a non-petroleum oil that is derived from castor beans.

Based upon technical literature searches, residuals from Ultraviolet Light / Hydrogen Peroxide advanced oxidation destruction process for PCB are expected to be chloride ions (nanograms per liter levels) and PCB degradation products (nanogram per liter levels).

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Rainfall from the treatment building area infiltrates into the surrounding soil.

- 2) Could waste materials enter ground or surface waters? If so, generally describe.

No. Only treated groundwater is re-infiltrated.

- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

None. Within existing facility infrastructure.

4. **Plants** [\[help\]](#)

- a. Check the types of vegetation found on the site:

Areas involved in this project are not currently vegetated.

___deciduous tree: alder, maple, aspen, other

___evergreen tree: fir, cedar, pine, other

___shrubs

___grass

___pasture

___crop or grain

___ Orchards, vineyards or other permanent crops.

___ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other

___water plants: water lily, eelgrass, milfoil, other

___other types of vegetation

- b. What kind and amount of vegetation will be removed or altered?

Areas involved in this project are not currently vegetated.

- c. List threatened and endangered species known to be on or near the site.

None are known of.

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

None. Areas involved in this project are not currently vegetated.

- e. List all noxious weeds and invasive species known to be on or near the site.

None are known of.

5. **Animals** [\[help\]](#)

- a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, heron, eagle, songbirds, other:

mammals: deer, bear, elk, beaver, other:

fish: bass, salmon, trout, herring, shellfish, other _____

Project location is within the existing operational areas of the facility.

- b. List any threatened and endangered species known to be on or near the site.

None known of.

- c. Is the site part of a migration route? If so, explain.

Unknown.

- d. Proposed measures to preserve or enhance wildlife, if any:

None.

- e. List any invasive animal species known to be on or near the site.

None known of.

6. Energy and Natural Resources [\[help\]](#)

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electrical energy for operation of treatment systems and building heating.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None.

7. Environmental Health [\[help\]](#)

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

Treatment system testing will include the use of hydrogen peroxide.

- 1) Describe any known or possible contamination at the site from present or past uses.

Treatment system is related to the cleanup of PCB in site groundwater.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

None.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

Treatment system testing will include the use of hydrogen peroxide.

- 4) Describe special emergency services that might be required.

None. Project covered by existing emergency services.

- 5) Proposed measures to reduce or control environmental health hazards, if any:

Current pilot level treatment operations have an existing Safety and Health Plan in place. As necessary and based on any changes in operation or the operation of additional technologies, the current Safety and Health Plan will be revised.

- b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

None. Project location is within the existing industrial operating area.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

None, other than some initial heavy equipment operation during construction.

3) Proposed measures to reduce or control noise impacts, if any:

Treatment system operations will be located indoors.

8. Land and Shoreline Use [\[help\]](#)

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

Heavy industrial. No impacts.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

No.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No.

c. Describe any structures on the site.

Project location is within the existing industrial infrastructure area.

d. Will any structures be demolished? If so, what?

No.

e. What is the current zoning classification of the site?

Heavy industrial.

f. What is the current comprehensive plan designation of the site?

Unknown.

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

Unknown.

i. Approximately how many people would reside or work in the completed project?

No additional.

j. Approximately how many people would the completed project displace?

None.

k. Proposed measures to avoid or reduce displacement impacts, if any:

Not applicable.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

None. Within existing industrial facility infrastructure.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Not applicable.

9. Housing [\[help\]](#)

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

Not applicable.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

Not applicable.

c. Proposed measures to reduce or control housing impacts, if any:

Not applicable.

10. Aesthetics [\[help\]](#)

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

Approximately 20 feet. Steel exterior industrial building.

b. What views in the immediate vicinity would be altered or obstructed?

None. Within existing industrial facility infrastructure area.

b. Proposed measures to reduce or control aesthetic impacts, if any:

None.

11. Light and Glare [\[help\]](#)

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None beyond exterior door safety lighting.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No.

- c. What existing off-site sources of light or glare may affect your proposal?

None.

- d. Proposed measures to reduce or control light and glare impacts, if any:

None.

12. Recreation [\[help\]](#)

- a. What designated and informal recreational opportunities are in the immediate vicinity?

None, project activity within existing industrial facility infrastructure area.

- b. Would the proposed project displace any existing recreational uses? If so, describe.

No.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

None.

13. Historic and cultural preservation [\[help\]](#)

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

Unknown.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

None.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

None, location is within the existing industrial facility infrastructure area.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None.

14. Transportation [\[help\]](#)

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

Existing site is accessed from Euclid and Sullivan.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

No. Six blocks to nearest transit stop.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

None.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

No.

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

No additional.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

Not applicable.

h. Proposed measures to reduce or control transportation impacts, if any:

None.

15. Public Services [\[help\]](#)

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

No.

b. Proposed measures to reduce or control direct impacts on public services, if any.

Not applicable.

16. Utilities [\[help\]](#)

a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,
other _____

Electricity and water.

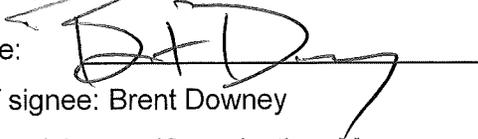
c. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Project will utilize existing utilities infrastructure at the facility.

C. Signature [\[HELP\]](#)

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:



Name of signee: Brent Downey

Position and Agency/Organization: Manager – Environmental Affairs

Date Submitted: January 20, 2020

D. Supplemental sheet for nonproject actions [\[HELP\]](#)

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.