



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

June 22, 2015

Mr. Scott Endres
Vice President Flat Rolled Products
Kaiser Aluminum Washington, LLC
PO Box 15108
Spokane Valley, WA 99215

RE: Kaiser Aluminum Washington, LLC - NPDES Permit No. WA-0000892
Compliance Inspection

Dear Mr. Endres:

I have enclosed the inspection report from my site visit on June 17, 2015. I wish to thank Bud Leber, Edgar Scott, Brent Downey, and Ron Lehrman for their time and assistance during the inspection.

I noted a couple of items requiring follow-up. These include:

- Your staff should be recording the time when effluent samples are collected for analysis. Permit condition S3.C requires the recording of 'the date, exact place, method, and time' for each sampling or measurement taken.
- When cleaning biological build up in the secondary clarifier, your staff should use procedures that minimize the carryover of these solids into the chlorine contact chamber and into the sanitary treatment plant effluent.
- For ease of reference and verification, please display Ecology's laboratory accreditation certificate, preferably in your laboratory.

Please review the inspection report and if you have any questions, please feel free to call me at (509) 329-3500.

Sincerely,

Pat Hallinan
Water Quality Section

PH:jab
cc/enc: Bud Leber, Kaiser Aluminum Washington, LLC

State of Washington Department of Ecology
Eastern Regional Office
WATER COMPLIANCE INSPECTION REPORT

substitute for OMB No. 2040-0057 and EPA form 3560-3
(Rev. 9-94)
(last file update 12-95.)

Section A: National Data System Coding (i.e., PCS)

Transaction Code 1 N 2 5	NPDES # 3 WA-0000892 11	yr/mo/day 12 15/06/17 17	Inspection Type 18 C	Inspector 19 S	Fac Type 20 2
Remarks Kaiser Aluminum Washington Class I Inspection					
Inspection work days 67 1.0 69	Facility Self-Monitoring Evaluation Rating 70 5	BI 71 N	QA 72 N	Reserved----- 73 _____ 74 _____ 75 _____ 80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Kaiser Aluminum Washington, LLC Trentwood Works 15000 E. Euclid Ave Spokane Valley, WA 99215	Entry Time/Date 10:07 AM / Jun 17, 2015 Exit Time / Date 12:30 PM / Jun 17, 2015	Permit Effective Date 07/01/11 Permit Expiration Date 06/30/16
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Bud Leber Environmental Engineering Manager (509) 927-6554; (509) 927-6095 fax		
Name, Address of Responsible Official/Title/Phone and Fax Number. Scott Endres Vice President Flat Rolled Products PO Box 15108, Spokane Valley, WA 99215-5108 Phone Number (509) 924-1500 Fax _____ Contacted ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Other Facility Data		

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Operations&Maint.	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input checked="" type="checkbox"/> Effluent/Receiving water	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> other

Section D: Summary of Findings/Comments

Edgar Scott, Senior Environmental Engineer with Kaiser Aluminum's Corporate Office and Brent Downey, Senior Environmental Engineer with Kaiser Aluminum Washington also participated in the inspection.

Permit: Ecology reissued Kaiser Aluminum Washington LLC's (Kaiser) NPDES permit in July, 2011, with an expiration date of June 30, 2016. The permit requires Kaiser to submit their permit renewal application at least 180 days prior to permit expiration (January 1, 2016). However, Ecology has requested an earlier submittal of the application due to the expected workload in re-issuing other permits on the Spokane River. Kaiser plans to submit their application in the next few months.

Facility Site Review: Kaiser owns and operates an aluminum rolling mill and metal finishing plant at Trentwood, Spokane County, Washington. The facility produces aluminum sheet, plate and coil through the rolling of aluminum with neat oils and emulsions. Supporting operations include direct chill casting and solution heat treating. Finished products are used in the aerospace industry and for general engineering applications.

The facility discharges treated process wastewater to the Spokane River (Outfall 001). Process wastewater consists of a combination of non-contact and contact cooling water (Outfalls 004 and 005), industrial process wastewater (Outfall 002), site stormwater, and sanitary wastewater (Outfall 003). These wastestreams all flow to a 4 million gallon lined settling lagoon, then through the black walnut shell (BWS) filtration system. During the inspection, the final discharge consisted of the BWS effluent (Outfall 006). In the past, the facility generated excess groundwater flows as part of onsite remediation activities; and discharged this excess water through the final outfall (Outfall 001). The facility stopped discharging the groundwater in September 2013. However, Kaiser will include this wastestream in their permit renewal application in the event this discharge resumes in the future.

The industrial wastewater treatment system receives oil and metal contaminated wastewater from the aluminum rolling operations. Treatment consists of an acid break oil water separation process, lime addition then clarification. Dewatered sludge from the clarifier are landfilled offsite.

The sanitary wastewater treatment system includes primary clarification, a trickling filter, secondary clarification, effluent disinfection, and sludge digestion. Secondary solids are sent back into the primary clarifiers. The facility pumps solids from the primary clarifier on a daily basis to the sludge digester.

At the secondary clarifier, plant personnel had recently cleaned the overflow weir. This resulted in carryover of solids (biological growth) into the chlorine contact chamber and the sanitary treatment plant effluent. Recommend that Kaiser

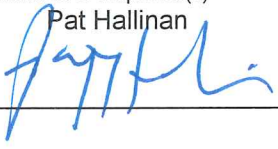

revise their cleaning procedures to minimize this carryover of solids. As recommended on the previous inspection, the facility had replaced the leaky gearbox on drive mechanism of the secondary clarifier sludge rake.

The BWS filters backwash to an above ground tank. In the tank, backwash solids settle to the bottom, while oils float to the top. When full, Kaiser withdraws water from the middle of the tank (40,000 gallons) for discharge back to the settling lagoon system. Tank bottoms (5,000 gallons) are discharged back into the wastewater pits in the industrial wastewater treatment system, located between the acid break and lime addition systems. Oils are sent to a second above ground tank for further oil recovery.

Records/Reports: The permit places effluent limits on the final discharge to the Spokane River (Outfall 001), the BWS effluent (Outfall 006), the sanitary treatment plant effluent (Outfall 003), and contains design criteria for the influent flow and PCB loading to the BWS filtration system. The facility has met permit limits at these monitoring locations during the past year.

During the inspection, I reviewed laboratory and sample collection records to verify compliance with permit condition S3.C Recording of Results. Recommended plant personnel record the time when permit compliance samples are collected (personnel were recording all other necessary items).

Laboratory. Kaiser's laboratory staff collects routine compliance monitoring samples. They analyze the samples for permit compliance onsite, except for PCBs, cadmium and lead. They send PCBs to Axys Analytical Services of Sidney, B.C. and cadmium and lead to ALS Environmental of Kelso, WA. Ecology has accredited all three labs for applicable permit parameters. Recommended that Kaiser display their certification certificate in their laboratory.

Name(s) and Signatures of Inspector(s)  Pat Hallinan	Agency/Office/Telephone WA Dept. of Ecology/Eastern Regional Office 4601 N. Monroe Street, Spokane, WA 99205-1295 (509)329-3500	Date 6/19/15
Signature of Management Q A Reviewer 	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/Eastern Regional Office rev's phone fax # (509) 329-3570	Date 6/23/15

ANNOUNCED Inspection

INSTRUCTIONS**Section A: National Data System Coding (i.e., PCS)**

Column 1: Transaction Code. Use N, C, or D for New Change or Delete. All inspections will be new unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. *(Use the Remarks columns to record State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	L Enforcement Case Support	2 IU Sampling Inspection
B Compliance Biomonitoring	M Multimedia	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

C - Contractor or Other Inspectors (<i>Specify in Remarks Columns</i>)	N - NEIC Inspectors
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors - EPA Lead	S - State Inspector
	T - Joint State/EPA Inspectors - State Lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 - Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 - Federal. Facilities identified as Federal by the EPA Regional Office

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.