

Evergreen Aluminum Smelter Facility Cleanup Enforcement Order



Enforcement Order Requires Interim Cleanup Action EVERGREEN ALUMINUM SMELTER - Vancouver, WA

Washington State Department of Ecology (Ecology) will issue an Enforcement Order requiring the owners to cleanup soil and water contaminants at the EVERGREEN ALUMINUM smelter. The smelter stands on a larger facility site, amid support buildings and other land owned by Alcoa, Inc.

Ecology's powers and duties, defined by the Model Toxics Control Act ("MTCA" –say **modt-kuh**— in Chapter 70.105D RCW), compel this Order to restore environmental health and protect human health.

EVERGREEN's smelter operations—since 2002—added to existing soil and water contamination on the larger site. Both owners of the combined properties, known previously as "Alcoa Vancouver," and as "VANALCO," want to sell the property during year 2008, to the Port of Vancouver.

This fact sheet describes the remedial action EVERGREEN must perform on its portion of the greater property site, in Vancouver.

What is an Enforcement Order?

The Enforcement Order directs the property owner to investigate past practices, locate and assess the extent of contamination, then plan and complete approved environmental cleanup actions at the site.

This Order requires EVERGREEN to: (a) find, map, and list contaminants of concern at the smelter; (b) design a site sampling strategy for those contaminants--sample density and depth, sampling protocols, and project QA/QC procedures; (c) identify applicable cleanup standards for the contaminants; and (d) develop a feasibility study informed by the sampling effort; (e) then, after agency approval, perform those interim actions

needed to ensure the property complies with our soil and water quality cleanup standards.

Under this Order EVERGREEN ALUMINUM must treat, remove /replace, or contain and cap (isolate) contaminated soil or water, and must prevent the release or threatened release of any hazardous substance onto or from its smelter site.

Administrative advantage

Issuing an Enforcement Order, rather than negotiating an Agreed Order, hastens the MTCA cleanup process-- allowing faster redevelopment to publicly-owned property.

Ecology's Enforcement Order compels the owner to perform work needed to ensure the site's condition complies with well established standards for the proposed use. The owner will demonstrate the site complies through both scheduled and unscheduled site inspections, and through tests, monitoring, and data reports. If EVERGREEN should fail to fulfill the Order, the owner would accrue on-going penalty fines and continued legal liability.

The timing of this Enforcement Order serves community plans. Three areas of the property remain to be cleaned up: the original aluminum smelter (EVERGREEN) site; and a waste oil lagoon known as "the Columbia Marine Lines Site," and the PCB-contaminated sediments (in the Columbia River) adjacent to the smelter.

The cleanup of the combined properties will allow ownership pass to the Port of Vancouver in 2008.

August 2007

PUBLIC COMMENT PERIOD FOR ENFORCEMENT ORDER

August 6, 2007 through
Friday, September 5,
2007

SEND WRITTEN COMMENTS TO:

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PUBLIC MEETING

7:00 PM Wednesday
August 22, 2007
Clark College Campus
Foster Auditorium
1800 E McLoughlin Blvd.
Vancouver, WA 98663

INFORMATION REPOSITORIES

Read a printed copy of the
Enforcement Order at either of
the following locations:

Industrial Section
Department of Ecology
300 Desmond Drive
Lacey, WA 98503
Phone: 360/407-6916

Fort Vancouver
Regional Library
1007 East Mill Plain Blvd
Vancouver, WA
Phone: 360/695-1566

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Ecology scheduled only one comment period for the Evergreen property. We welcome your questions and comments about the sampling and cleanup methods. Please send your comments at any time through September 5, 2007. (The box on the front page shows where to read copies of the documents, and gives the time and location of the public meeting.) The mapping and interim cleanup actions performed under the Enforcement Order should satisfy EVERGREEN's responsibility for its portion of the larger site.

Site background

Alcoa, Inc. owned and operated the full smelter complex from the late 1940's until 1986. From the early 1950's through the mid 1980's Alcoa's complex included the aluminum smelter and a series of fabrication plants. In those buildings, Alcoa used its aluminum metal to form finished goods such as wire, rods, and extruded channels.

In 1987 Alcoa sold the smelting operation to VANALCO, but retained title to the manufacturing buildings and surrounding land. In 2000 VANALCO closed the smelter and in 2002 sold it to EVERGREEN ALUMINUM Company. EVERGREEN operated the smelter from 2002.

In 1987 Alcoa also began closing and selling portions of the remaining manufacturing buildings and surrounding property, while VANALCO and EVERGREEN each operated the aluminum smelter.

What's been done?

EVERGREEN ALUMINUM reviewed the site's land use history and identified areas of confirmed and suspected releases. The Enforcement Order required the smelter operators to submit a sampling plan for investigating certain areas of the smelter. Those areas include: carbon storage and green mill (PAH contamination), bone yard south of smelter potlines (metals contamination), the rectifier and transformer yard (oil and PCB contamination), site electrical grid (PCB contamination), carbon anode bake ovens (fluoride ground water contamination), and closed bake oven wet scrubber sludge lagoon (PAH contamination). EVERGREEN will characterize any new contamination found during the smelter building's demolition.

After Ecology approves the sampling plan EVERGREEN will submit its remedial investigation and feasibility study for the facility. The Feasibility Study will include a list of interim actions that are complete or in progress during the smelter building demolition. The study will also detail a list of remedial technologies EVERGREEN initially screened, and a focused list of alternative cleanup actions. Those alternatives will at a minimum include:

- no remediation, and long-term monitoring;
- completely remove areas showing contamination in concentrations higher than a cleanup threshold, and ground water monitoring;
- remove contaminant source areas from the site, capping (placing an impermeable material area to prevent leaching and migration);
- limited source area removal, pumping and treating groundwater, and capping the area.

Prior to starting the smelter cleanup EVERGREEN will complete and report the results of investigating and soil and water sampling, will establish an approved protocol for conformational sampling, and will identify the correct cleanup standards for the smelter site's contaminants of concern.

What happens next?

The Enforcement Order will take effect before the comment period ends. But we will weigh the merits of each comment. If any comment persuades Ecology that the site requires more cleanup, we will revise the final cleanup action for the EVERGREEN Alcoa site, and we will conduct it later, under terms of a Consent Decree.

Ecology invites you to visit an information repository at the Fort Vancouver library. Read and comment on the proposed Enforcement Order and on EVERGREEN ALUMINUM's proposed interim remedial actions. Convey your ideas to Ecology's decision-makers. And participate in the Public Meeting at Clark College - Foster Auditorium at 7:00 o'clock on August 22. Come learn about, discuss, and comment on the proposed interim cleanup action.

Submit written comments by September 5, 2007, to Paul Skyllingstad. Ecology will provide updates of site activities to those who submit comments or who ask for inclusion on the site mailing list.

*If you need this publication in an alternate format, please phone Kathy Vermillion in Lacey at 360/407-6916.
Persons with hearing loss may press 711 to connect with the Washington Relay Service.
Persons with speech disability may phone 877/833-6341 for assistance.*