

Kaiser Trentwood Site Update

Toxics Cleanup Program



RI Addendum, Focused Feasibility Study, Interim Actions, and SEPA Documents Available for Comment

Kaiser Aluminum Washington, LLC is cleaning up contamination at the Kaiser Trentwood Site located at 15000 East Euclid in Spokane Valley, Spokane County, Washington. The WA Department of Ecology is providing oversight on the cleanup projects. This oversight is based on a citizen mandated regulation called the Model Toxics Control Act (MTCA). Ecology is also ensuring other environmental regulations and laws are met during the cleanup process.

Several cleanup actions have already taken place at the site. Recently, the public was provided an opportunity to review several reports from a Remedial Investigation, Feasibility Study, and Human Health and Ecological Risk Assessment conducted at the site. As a result of information obtained during the investigation and analysis of cleanup options, Ecology has determined certain interim actions are needed for the following reasons:

- To reduce potential threats to human health and the environment.
- To obtain more information that will be used to select a cleanup plan for Polychlorinated biphenyls (PCBs) in groundwater.
- To implement cleanup of soils and petroleum in groundwater to improve environmental conditions at the site.

The following new documents are available for public review and comment. A brief summary of these documents is contained on the following pages of this fact sheet. Comments will be accepted August 20 through September 19, 2012 and may be submitted to Teresita Bala at the address listed in the box on the right.

- Amendment to the 2005 Agreed Order and Public Participation Plan
- Remedial Investigation Addendum for the West Discharge Ravine
- Focused Feasibility Study for the West Discharge Ravine
- Two separate State Environmental Policy Act (SEPA) Checklists and Determinations of Non-Significance (DNS)

August 2012

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For **ADA** accommodations or documents in an alternate format call Carol Bergin 509/329-3546, 711 (relay service), or 877-833-6341 (TTY).

Para asistencia en Español Richelle Perez 360/407-7528

Если вам нужна помощь на русском, звоните Larissa Braaten 509/710-7552

Submit Comments and Technical Questions

Teresita Bala, WA Department of Ecology 4601 N. Monroe St. Spokane WA 99205-1295 509/329-3543 tbal461@ecy.wa.gov

Public Involvement Questions

Carol Bergin, WA Department of Ecology 4601 N. Monroe St. Spokane, WA 99205-1295 509/329-3546 cabe461@ecy.wa.gov

Document Review Locations

WA Department of Ecology Kari Johnson, Public Disclosure 4601 N. Monroe St. Spokane, WA 99205-1295 509/329-3415 for appointment

Spokane Valley Library

12004 E. Main Spokane Valley, WA 99216 509/893-8400

Ecology's Toxics Cleanup Website:

https://fortress.wa.gov/ecy/gsp/Sitepage. aspx?csid=7093

Facility Site ID No. 53481373 **CSID No.** 7093

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Amendment to Agreed Order

The Amended Agreed Order requires Kaiser to perform work that is divided into two parts.

<u>Part One</u>: Treatability and or pilot studies are necessary to determine if natural biodegradation of PCBs is occurring at the site and if so at what rate. An evaluation of whether a filtration system can remove PCBs from extracted groundwater is also necessary. Kaiser will perform these studies.

<u>Part Two</u>: Kaiser will implement the following interim actions:

- Remove contaminated soils in the upland area and transport them to an approved facility.
- Place a protective cap over the remaining upland soils.
- Complete cleanup actions for petroleum in groundwater, including installation of a new well and reactivation and operation of all wells together to recover petroleum product from groundwater.
- Remove contaminated soils from deeper levels than previously completed in the West Discharge Ravine area.

Two separate SEPA checklists and two Determinations of Non-significance have been prepared. One checklist and DNS covers the removal of soil, capping and groundwater work including the installation, reactivation and operation of the product recovery wells. The checklist also covers the treatability study. The second SEPA checklist and DNS covers work to be done in the West Discharge Ravine area.

The Amended Agreed Order also contains an amended Public Participation Plan. This Plan outlines ways Kaiser and Ecology will inform and engage the public in the cleanup process. This fact sheet is one way the public is informed about activities at the site. People are also invited to participate by commenting on the documents that will guide the proposed interim actions.

Remedial Investigation Addendum and Focused Feasibility Study for West Discharge Ravine

The draft Remedial Investigation Addendum is now complete. The purpose of the Remedial Investigation Addendum was to determine if PCBs remaining in soils at the West Discharge Ravine (WDR) were a potential source of groundwater contamination. The source of PCBs in this area is associated with past wastewater discharge activities.

This additional investigation concludes PCBs in soil at the WDR are at concentrations sufficient enough to be a potential source of contamination to groundwater. These impacts appear to vary based on seasonal water levels and interactions between the Spokane River and Aquifer.

The Focused Feasibility Study evaluated four cleanup alternatives for the WDR area. All four alternatives included institutional controls such as fences, controlled access to the WDR, best management practices, and prevention measures including restricting how the property may be used.

All four alternatives also include monitoring groundwater over time and monitored natural attenuation, which is allowing the contamination to cleanup on its own over time. Treatment and stabilization of soil were also evaluated.

Kaiser's preferred cleanup option is to use institutional controls, monitoring, monitored natural attenuation and soil excavation with off-site disposal. The Amended Agreed Order proposes to require Kaiser to implement this cleanup option.

State Environmental Policy Act (SEPA)

The State Environmental Policy Act, known as SEPA, requires government agencies to consider potential environmental impacts of a project before beginning the cleanup. A Determination of Non-Significance indicates the proposed actions will not

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have a probable significant adverse impact on the environment.

- After review of the two environmental checklists and other site-specific information, Ecology determined the actions to address contaminants in soil, groundwater, and the treatability study along with work at the West Discharge Ravine will not have a probable significant adverse impact on the environment.
- These interim actions will benefit the environment by reducing PCBs and petroleum contaminants in soil and groundwater and by reducing the release of toxic chemicals from the site, and reducing exposure pathways.
- Therefore, Ecology has issued two Determinations of Non-Significance (DNS) for the interim actions.

Site Overview

The site covers nearly 512 acres and lies over the Spokane Valley-Rathdrum Prairie Aquifer. The site is north and east of the Spokane River.

The U.S. Government Defense Plant Corporation created the Trentwood facility in 1942 to produce aluminum for World War II aircraft. Kaiser leased the facility in 1946 and later purchased it along with the property. The Trentwood facility now operates as an aluminum sheet and plate rolling mill.

Polychlorinated biphenyl (PCB) oil, petroleum fuels, solvents, and chromium are some of the materials formerly used in connection with mill operations. Some wastes generated during past or present operations include wastewaters, chrome sludge, paint and solvent wastes, and black dross.

Future Cleanup Action Plan

The proposed interim actions to be completed will improve conditions at the site. If successful, these actions may be considered final remedies for all contamination in soil and petroleum in groundwater. However, that decision would not be made until Ecology writes a Draft Cleanup Action Plan and it goes through public comment. After the interim actions are implemented, Ecology will write the Draft Cleanup Action Plan. This Plan will select the most appropriate cleanup alternative(s) to address any remaining contaminants at the site. The cleanup actions will be based on current proven scientific technologies, protection of human health and the environment, and public input.

What Happens Next?

Ecology will respond to all comments **received by September 19, 2012**, and a Responsiveness Summary will be sent to all commenters. Ecology will modify the reports based on public comment if appropriate. If no changes are made, the reports will become final and the work will move forward.

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Kaiser Trentwood Site Map

August 2012



Figure 1 Kaiser Trentwood Facility Map (adapted from Hart Crowser figure)