

**DRAFT
WEST DISCHARGE RAVINE INTERIM ACTION WORK PLAN
KAISER TRENTWOOD FACILITY
SPOKANE VALLEY, WASHINGTON**

1.0 INTRODUCTION

This Interim Action Work Plan describes the proposed tasks and field methods that will be used to address polychlorinated biphenyl- (PCB-) and petroleum-contaminated soil in the West Discharge Ravine (WDR). This Work Plan was prepared under Ecology Order DE 2692 and will be accomplished in accordance with the Model Toxics Control Act (MTCA) requirements for Interim Actions (WAC 173-340-430).

1.1 Purpose

Based on soil data collected from the WDR during the Phase I Remedial Investigation (RI), Kaiser and Ecology determined that conducting the WDR cleanup as an Interim Action is necessary to reduce potential risks to human health and the environment. The primary purpose of this Interim Action is to address PCB- and petroleum-contaminated soil in the bottom of the WDR. Associated with this will be verification sampling and analysis to confirm cleanup levels are met, site restoration to prevent erosion and enhance habitat, and screening and disposal of the excavated soil.

1.2 Report Organization

This Work Plan has been developed in accordance with WAC 173-340-430 and consists of five sections:

- **1.0 INTRODUCTION** describes the project background, facility description, objectives, and report organization.
- **2.0 INTERIM ACTION WORK PLAN** discusses existing site conditions, previous investigation results, additional data needs, Interim Action alternatives evaluated, cleanup levels, design and construction plans, soil management and disposal, stormwater management, site restoration, cultural resources assessment, and project schedule.
- **3.0 APPLICABLE RELEVANT AND APPROPRIATE REQUIREMENTS** lists the federal, state, and local requirements that will apply to this interim action.

- **4.0 PUBLIC PARTICIPATION** discusses the public review requirements of this project.
- **5.0 REFERENCES** presents the references cited in this report.

These five sections are supported by tables and figures that are numbered and presented at the end of their respective sections. Further, the report contains the following appendices.

- **A – SAMPLING AND ANALYSIS PLAN AND QUALITY ASSURANCE PROJECT PLAN** describes the methods to be used for field sampling, verification sampling, excavated soil characterization sampling, and the analytical methods and quality assurance/quality control procedures to ensure adequate data quality.
- **B – HEALTH AND SAFETY PLAN** contains the site-specific requirements to be followed by field personnel, which ensure the work is conducted in a safe manner and follows state and federal Occupational Health and Safety regulations.

1.3 Location and Facility Description

The Kaiser Trentwood facility, which consists of about 512 acres of land, is located in the Spokane River Valley at East 15000 Euclid Avenue, about 10 miles east of downtown Spokane in the City of Spokane Valley, Washington (see Figure 1-1 for location). Township/range coordinates for the site are Township 25 North, Range 44 East, Section 2 (south ½), Section 10 (northeast ¼), and Section 11 (north ½).

The Kaiser Trentwood aluminum rolling mill was originally planned and constructed by the United Engineering and Foundry Company of Pittsburgh, Pennsylvania, acting "for and on the behalf of" the Defense Plant Corporation. The facilities purpose was to provide aluminum for the manufacture of fighter planes and bombers used in the World War II effort. The first construction machinery was at the site in April 1942, and the first aluminum ingot was cast from the mill on November 24, 1942. During the war, 75 percent of the aluminum was heat-treated, and 25 percent was annealed. The plant successfully supported the war effort, and at war's end, was placed in mothball status (with weekly standby maintenance).

Kaiser Aluminum & Chemical Corporation first leased the government's surplus Trentwood facility in 1946, as well as its Mead smelter. With these facilities, plus a smelter in Tacoma, Washington, along with relatively inexpensive alumina

sources, Kaiser entered into the aluminum business. Kaiser redesigned machinery throughout the plant to allow for manufacture of more diverse products. For example, the cold-roll area was changed to produce soft alloys, which were used for transportation, building materials, and consumer goods. Flat sheet, coil sheet, coring sheet, and plate were the aluminum products initially produced at Trentwood, in two basic alloy types: soft (non-heat-treatable) and hard (heat-treatable).

At the end of 3 years of operation, Kaiser purchased the facility from the federal government.

Post-World War II domestic and overseas demands for aluminum were above expected levels, and with the advent of the Korean War in the early 1950s, defense needs also increased. A booming economy prompted Kaiser to expand its Trentwood facility to keep up with the demand.

During the Korean War, Trentwood installed machinery for roll forming and added equipment for painting, slitting, and anodizing their products. In the late 1950s, Kaiser was developing a continuous heat-treat furnace that would significantly reduce the labor involved in the manual process.

The 1960s brought an important capital and process addition to the Kaiser Trentwood facility; coating coil to be used as the ends of beverage cans. Kaiser had the industries first can stock finishing line.

The 1970s brought changes associated with passing of the Clean Air Act (CAA) and Clean Water Act (CWA). Induction and rotary barrel furnace emissions in the remelt department were controlled by new baghouses. An industrial wastewater treatment plant was constructed in 1972-1973, consisting of a cooker, oil/water separators, wastewater storage tanks, Hoffman tank, lime neutralization system, a clarifier, drum filter, sludge bin, surge pond, and lagoon.

The 1980s and 1990s were a period of modernization and equipment upgrade at the Kaiser Trentwood mill, to keep pace with the changes in technology and customer needs. Since 2001, plant production operations have become more focused on the aircraft, transportation, and industrial markets. As part of this change, the beverage can body and lid stock were eliminated and overall plant production volumes were reduced.

A number of upgrades were made to the Trentwood wastewater treatment processes in 1973 associated with requirements of the CWA. These included the installation of the Industrial Wastewater Treatment (IWT) plant designed for the treatment of concentrated oil/emulsion, hexavalent chromium, and related

wastewaters. Additionally, the wastewater originating from the Casting Operations, Oil Reclamation Building (ORB), Hot Line, and associated areas that were previously discharged to the river through the old WDR were routed to the new IWT plant and lagoon system. The location of the former WDR is shown on Figure 1-1.

According to aerial photographs, the ravine area located east of Kaiser's fence line began to be filled to make way for the sanitary and IWT plants in about 1972. Today, the ravine is visible west of the fence line and appears to be in its original configuration (Figure 1-2). Moving up the ravine east of the fence line, the ravine has been filled to provide a road crossing east of which the ravine is again visible to within about 20 feet of the Emergency Bypass Basin for the IWT plant. The remainder of the ravine up from this point has been filled. Because of the permeable nature of site soils, the WDR is typically dry and does not contain water.