

**EXHIBIT B**  
**Aluminum Recycling Trentwood Site Scope of Work**  
**Remedial Investigation/Feasibility Study**

This scope of work is designed to investigate contamination at the Aluminum Recycling Trentwood Site (Site) in Veradale, Washington. Under Agreed Order No. 6968, to which this Scope of Work is an exhibit, the potentially liable party (PLP) will implement this scope of work in order to develop necessary Work Plans and to conduct a Remedial Investigation/Feasibility Study (RI/FS) for the Site that meets the requirements of the Model Toxics Control Act cleanup regulation, Chapter 173-340 WAC.

The RI is to supplement existing data and determine the nature and extent of contamination by hazardous substances at the Site. The FS will evaluate remedial alternatives that are applicable to the Site. The information and data gathered during the RI/FS shall be used to identify if additional data needs be collected and determine an appropriate remedial action. The PLP shall furnish all personnel, materials, and services necessary for, or incidental to, performing the Remedial Investigation at the Site. The RI/FS shall contain the following tasks:

**Task I: RI/FS Project Plan**

**A. RI/FS Work Plan**

The PLP shall prepare a work plan outlining procedures for the Remedial Investigation, which includes the following information:

**1. Facility Background**

- General Facility Information, including, but not limited to, legal description of the facility, present owner and/or operator; chronological listing of past owners and/or operators and operational history; adjacent property owners, zoning designations of property and adjacent properties, current site activities/operations, and other pertinent information.
- Site Conditions Map (s) that illustrates relevant current site features such as property boundaries, proposed facility boundaries, surface topography, surface and subsurface structures, utility lines, well locations, and other pertinent information (for example, surface water bodies near the vicinity of the Site). All maps will be consistent with the requirements set forth in WAC 173-340-840(4) and be of sufficient detail and accuracy to document all current and future work performed at the Site.
- Locations and logs of all known monitoring wells, groundwater supply wells, and identification of known springs within one mile radius from the site.
- Previous Investigations and Remedial Activities. This will include data reports generated during previous investigations and remedial actions undertaken.

**2. Planning and Description of RI/FS Tasks II and III**

**3. Project Management – project team, roles, and responsibilities**

**B. Sampling and Analysis Plan**

The PLP shall prepare a Sampling and Analysis Plan for use during all Site characterization

activities. The plan shall conform with the requirements of WAC 173-340-820, and shall generally contain:

1. Field Sampling and Testing Plans – The plan shall describe in detail the sampling, testing, and data gathering methods, locations, frequency and other field study procedures that will be used for obtaining data required to complete the RI/FS. The Sampling and Testing Plan will include the following:
  - a. Purpose and objectives of the data collection activities;
  - b. Specific sampling methods, including number and type of QA/QC samples;
  - c. Sampling locations and designations, including access considerations;
  - d. Types of media to be sampled and the number of samples of each;
  - e. Proposed number and location of monitoring wells, soil borings, test pits and other investigative activities;
  - f. Schedule and task assignments;
  - g. Supplies and equipment;
  - h. Monitoring well construction requirements;
  - i. Analytical procedures, methods, and detection limits;
  - j. Sample custody procedures, including holding times, containers, and preservation;
  - k. Investigation-derived waste management;
  - l. Shipping and handling arrangements.
2. Quality Assurance Project Plan (QAPP)
  - a. Field quality assurance/quality control (QA/QC) methods;
  - b. Chain of custody procedures;
  - c. Decontamination procedures;
  - d. Laboratory QA/QC methods;
  - e. Electronic data management, archival, and transmittal protocols.

C. Health and Safety Plan, conforming with WAC 173-340-810 and generally including:

1. Level of chemical protection;
2. Hazard evaluation;
3. Waste characteristics;
4. Special considerations and emergency information.

### **Task II: Remedial Investigation**

The purpose of the Remedial Investigation is to obtain the information necessary to supplement and verify existing data. That information will be used to characterize the Site and source(s), type(s), and extent of contamination present to sufficiently complete the Feasibility Study and select the appropriate Remedial Action. The resulting data shall meet the criteria set out in the QAPP and be of sufficient quality to develop an appropriate remedial action for the Site. The investigation shall meet the requirements stated in WAC 173-340-350, and more specifically, shall include the following elements:

#### A. Site Characterization

Conduct representative sampling and testing to assess the nature and extent of contamination.

Conduct analytical tests on groundwater and soils contamination in the vicinity of the Site. Data must be sufficient to delineate the sources, type, depth, concentration and areal extent of contaminants, along with information that addresses the rate and direction of contaminant movement.

1. Hydrogeology

- a. Install new groundwater monitoring wells, background wells, and soil borings where needed and comply with the resource protection well requirements of 173-160 WAC
- b. Generate well logs such that regional stratigraphy may be characterized
- c. Characterize site-specific stratigraphy and lithology based on well logs, maps, and any other information available
- d. Estimate hydrogeologic parameters such as hydraulic conductivity and porosity
- e. Measure water levels in all wells and new borings
- f. Collect at least two rounds of groundwater samples at any site monitoring wells so that seasonal high and low flows are captured
- g. Analyze groundwater for metals, inorganic chemicals (chloride, fluoride, nitrate, nitrite), general water quality parameters, and any other contaminants based on historical property use
- h. Generate maps and/or figures showing water levels and regional/site hydrogeology

2. Soils

- a. Install soil borings and/or excavate test pits, and collect representative soil samples for the characterization of lithology, subsurface conditions, and contaminant concentrations.
- b. Characterize soil samples using the Unified Soil Classification System (USCS)
- c. Generate logs for each boring and/or test pit
- d. Analyze soils for metals and inorganic chemicals (chloride, fluoride, nitrate, nitrite) and any other contaminants based on historical property use

B. Potential Receptor Information

Collect data on the surrounding human and ecological populations that may be in contact with contaminants and potential routes of exposure for those populations in support of the Feasibility Study.

1. Public Use/Site Access – Potential uses of the affected properties and the presence or absence of controls on Site access;
2. Potential Groundwater/Surface Water Uses – Any consumptive, recreational, or other use of groundwater and surface water in the area, and by which populations;
3. Environmental Receptors – Information on the presence of endangered or threatened species, potential habitats, and ecological environments.

**Task III: RI/FS Report**

The PLP shall complete a report documenting the RI/FS as required by WAC 173-340-350(7) and (8). This report shall include, but not be limited to, the following elements:

A. Remedial Investigation

1. Background Information
  - a. Site & Facility Operational History
  - b. Physical Setting
  - c. Previous Investigations & Studies
  
2. Nature and Extent of Contamination

The PLP shall prepare an assessment and description of the degree and extent of contamination. This should include:

  - a. Data Analysis – Analyze all data collected during Task II (Remedial Investigation) and prepare supporting maps and tables;
  - b. Lab reports, previous investigations, well and boring logs, and any other documentation of characterization activities shall be included.
  
3. Applicable, Relevant, and Appropriate Requirements (ARARs) Analysis

Identify Applicable State and Federal Laws for cleanup of the Site in accordance with WAC 173-340-710.
  
4. Cleanup Levels/Risk Assessment Analysis

Perform a baseline Model Toxics Cleanup Act (MTCA) cleanup levels analysis/baseline risk assessment characterizing the current and potential threats to public health and the environment that may be posed by hazardous substances at the facility. The assessment will integrate cleanup standards and risk assessment as required by WAC 173-340-357 and WAC 173-340-708.
  
5. Discussion and Recommendations
  - a. Interpret and discuss data to determine the nature and extent of the contamination and to support final recommendations for the Site;
  - b. A summary of all possible and suspected source areas of contamination based on the data collected will be included;
  - c. Any known or potential risks to the public health, welfare, and the environment should be discussed;
  - d. Recommendations should be provided identifying additional data requirements.

## B. Feasibility Study

The purpose of the Feasibility Study is to evaluate potential remedial technologies and approaches to enable selection of an appropriate remedial action for the Site. The Feasibility Study must meet the requirements stated in WAC 173-340-350(8).

1. Identification of contamination to be remediated;
2. Identification and initial screening of remedial actions;
3. Proposed remedial alternatives and evaluation with respect to MTCA criteria;
4. Recommended alternative.

## Schedule of Deliverables

| <u>Deliverables</u>   | <u>Date Due</u>   |
|---|---|
| Effective date of Order   | Start   |
| PLP to Submit <i>Draft</i> RI/FS Work Plan, <i>Draft</i> Sampling and Analysis Plan, Health and Safety Plan (Task I) and Schedule of Work to be Performed | 90 days after start   |
| PLP to Submit <i>Final</i> RI/FS Work Plan, Sampling Analysis Plan (Task I) and Schedule of Work to be Performed  | 45 days after PLP receives and written approval from Ecology of draft documents |
| PLP to Begin implementation of RI (Task II) Schedule of Work to be Performed  | 30 days after PLP receives following written approval of plans from Ecology     |
| PLP to Submit <i>Draft</i> RI/FS Report (Task III)  | As approved in RI/FS Work Plan  |
| PLP to Submit <i>Draft Final</i> RI/FS Report (Task III)  | 30 days after PLP receives Ecology's written approval of draft                  |
| Progress Reports  | Every month   |