

Kaiser Aluminum Investments Company

Mead Property Removal Actions

Spokane River Regional Toxics Task Force

December 2020



▪ The Parties

- Kaiser Aluminum & Chemical Corporation (KACC)
 - No longer exists following a bankruptcy in 2006 and subsequent dissolution
- Spokane Recycling Company, LLC (Spokane Recycling)
 - Current owner of Mead facility parcel and outfall parcel
- Kaiser Aluminum Investments Company (KAIC)
 - Owner of undeveloped parcel where ponds used by Spokane Recycling to manage stormwater are located

- **Sale of the Mead facility and outfall parcel**

- In 2004, KACC sold the Mead facility and outfall parcel as a fully operational unit
- The sale did not include the undeveloped parcel north of the Mead facility
- The sale did include an easement to use the existing ponds and conveyance system located on the undeveloped parcel which required any owner of the Mead facility to maintain them
- The facility's NPDES permit was also transferred to Mead facility purchaser

Background



Background

- **Mead facility and outfall parcel ownership**
 - CDC Mead, LLC from 2004 to 2012
 - New Mill Capital Mead, LLC from 2012 to 2014
 - Spokane Recycling from 2014 to present
- **KAIC involvement**
 - No ownership or involvement with Mead facility or any activities undertaken by owners

- **Easement and Existing Stormwater System on KAIC's property**
 - Conveyance system includes piping from the Mead facility to outfall parcel
 - Existing ponds include settling pond (lower pond) and associated sediment dewatering pond (upper pond)
 - Easement requires Mead facility owner (currently Spokane Recycling) to properly operate and maintain ponds and conveyance system and to secure and comply with all required permits, including the NPDES Stormwater Permit

- **EPA Investigation**

- In May 2019, EPA requested, and KAIC provided, access to ponds and conveyance system for collection of water and sediment samples
- In October 2019, EPA requested under its CERCLA authority that KAIC provide various documents related to Mead facility
- In July 2020, EPA issued an Action Memorandum detailing actions to be taken on KAIC's property

- **KAIC and EPA Voluntary Agreement**

- In August 2020, KAIC and EPA signed an “Administrative Settlement Agreement and Order on Consent for Removal Actions” (AOC)
- The Agreement provided for the following:
 - Removal and off-site disposal of sediments contained in the upper and lower ponds
 - Treatment of water contained in the upper and lower ponds
 - Development and submittal of Work Plan for EPA approval
 - Submittal of a project completion report

Project Elements

- Project scoping and planning
- Drain water from upper pond to lower pond
- Sediment removal from upper pond
- Seal off lower pond inlet
- Transfer all water from lower pond to upper pond
- Re-route Spokane Recycling site runoff to upper pond during lower pond work
- Water processing through treatment system
- Sediment removal from lower pond and return lower pond to service
- Confirmation of AOC completion by EPA on November 3, 2020
- Submittal of Completion Report by January 4, 2021

Upper Pond Before Removal Action



Upper Pond After Removal Action



Upper Pond Status

- Some Spokane Recycling site runoff is present in upper pond
 - ~53,000 gallons
 - Ecology requested
- Hydrostatic testing confirmed liner integrity

Lower Pond Before Removal Action



Lower Pond During Removal Action



Lower Pond During Removal Action



Lower Pond During Removal Action



Lower Pond During Removal Action



Lower Pond After Removal Action



Project Before and After



Lower Pond Status

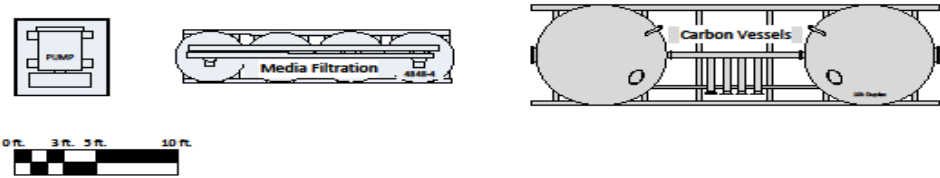
- Pond was fitted with additional new 40 mil HDPE liner
- Pond returned to service on October 30, 2020
- EPA issued determination that KAIC completed AOC required removal actions on November 3, 2020
- Requirements of Spokane Recycling's 2017 Ecology issued Industrial Stormwater General Permit that replaced NPDES Permit No. 0000876 and Easement Agreement with KAIC remain in effect

Temporary Water Treatment

Clean Harbors - Kaiser



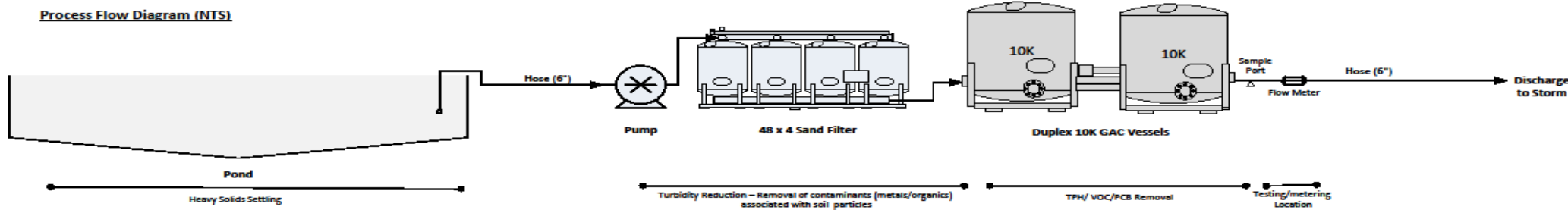
Equipment Layout (Conceptual)



REVISIONS			
REV	DESCRIPTION	DATE	INITIALS
1	Equipment Layout/PFD	9/3/2020	LD
2			
3			
4			

DRAFT

Process Flow Diagram (NTS)



Treatment Narrative

Water from the pond will be pumped to the sand filter for turbidity reduction prior to passing through two 10,000 lb. granular activated carbon (GAC) vessels in series. Piping will be 6" aluminum with cam lock fittings. A flow meter and sample port will be placed after the GAC vessels. Discharge is to the separate storm system. Sample analysis will dictate if additional treatment/filtration is required. Sand filters to backwash to source pond.

NOTE:
SYSTEM NOT DESIGNED BY WATERTECTONICS. ALL NECESSARY ADJUSTMENTS TO THE SYSTEM WILL BE MADE TO CONFORM TO THE FEDERAL, STATE AND LOCAL DISCHARGE REQUIREMENTS. THIS MAY INCLUDE, BUT NOT BE LIMITED TO, THE ADDITION, UPSIZING, OR REPLACEMENT OF TANKS, PUMPS, FILTERS, SENSORS, CO2 CANNISTERS, TREATMENT CHEMICALS AND ANY REQUIRED EQUIPMENT OR HARDWARE.

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DRAWN	LD	PG SIZE	DWG NO	PROJECT NAME	REV
ISSUED	9/3/2020	11x17		Clean Harbor - Kaiser	0
		SCALE		SHEET	1 OF 1



Temporary Water Treatment



Temporary Water Treatment



Project Statistics

- **Project Duration**
 - August 15, 2020 to October 30, 2020
- **Sediment Removal and Disposal**
 - Upper pond - ~650 tons
 - Lower pond - ~2,800 tons
- **Water Processed**
 - Water initially in ponds - ~286,000 gallons
 - Site runoff during lower pond sediment removal work - ~470,000 gallons
 - Monitoring conducted with 40 CFR Part 136 approved methods

Future Activity

- **KAIC pursuing with Ecology replacement of ponds with fully permitted stormwater infiltration system swale**
 - Preparing for submittal a technical package for system design
 - Area used for system would become property of Spokane Recycling
 - Spokane Recycling (and subsequent owners) will have O&M responsibility
 - Easement for use of current system will be terminated
 - Discharge to Deadman Creek will be eliminated

Questions