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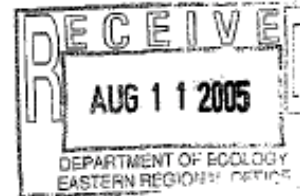
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Toxics Cleanup Program
4601 N. Monroe
Spokane, Washington 99205

SENT VIA EMAIL AND REGULAR MAIL

RE: Proposed Agreed Order for Remedial Investigation and Feasibility Study for Kaiser Trentwood Site

Dear Ms. Bala:

These comments are submitted on behalf of the Sierra Club, Upper Columbia River Group on the Proposed Agreed Order for a Remedial Investigation and Feasibility Study (RI/FS) for the Kaiser Trentwood Site. Sierra Club urges the Department of Ecology (Ecology) to take a larger role in the implementation of the remediation of the Kaiser property under their powers provided in Washington Administrative Code 173-340-510(4). Since 1994, Kaiser's cleanup efforts have been plagued with problems and inadequacies, and it is time for Ecology to take over the project.

The history of the contamination and cleanup efforts supports the need for a larger role by Ecology in the cleanup effort at the Kaiser site. As illustrated below, past cleanup efforts have either been inadequate or non-existent.

1980 - Kaiser reported a fuel oil spill of 10,000 gallons. Ecology's investigations revealed the spill size to be between 50,000 and 100,000 gallons. No remediation ever occurred.

1990 - The 6,000 gallon Hoffman Tank was removed. Approximately 6,500 cubic yards of soil was removed up to a depth of 35 feet and an impermeable liner was placed in the area. Ecology now finds that the contamination needs to be evaluated further by Kaiser.

1991 - Kaiser removed a 20,000 gallon unleaded gasoline UST near the oil house. 1,200 cubic yards were excavated and excavation terminated at 18 feet. The area was capped

MISSION STATEMENT

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with clean fill and asphalt. Contaminates were left beyond the 18 foot mark and now Kaiser is now examining the extent of the contamination.

- Eight USTs were removed and 7,000 cubic yards of soil were removed down to an excavation depth of 32 feet.
- Oil house French drains were removed and PCBs were discovered. Excavation was performed to a depth of 7 feet, along with asphalt capping and backfill. Now PCBs have been detected at a depth of 65 feet.
- An aluminum rolling lubricant leaked from a transfer line in the tank farm east of the oil house. Three-hundred cubic yards of soil were removed with an excavation depth of 12 feet.

1992 - The wastewater lagoon was found to be heavily contaminated with PCBs and hexavalent chromium. Sludge was removed and again was removed in 1998. Kaiser is now investigating the source of the contaminants and the extent of the contamination.

1993 - Kaiser began implementing independent remedial measures to contain and actively remediate groundwater in the oil house and wastewater areas.

1994 - Kaiser was notified of its status as a PLP under MTCA.

1996 - Kaiser submitted a Draft Groundwater Remedial Investigation Study (RIS) to Ecology. The study showed groundwater was contaminated with TPH, PCBs, iron, manganese, antimony and arsenic.

- Investigations were conducted around the oil reclamation building. Contamination was found to be at depths ranging from 20 to 70 feet. Kaiser recommended an asphalt cap and liner.

1998 - Transfer line leak was discovered in a line that carried oil-contaminated wastewater from the oil reclamation building to the wastewater facility. Five-hundred cubic yards was excavated and capping occurred. Ecology estimates that 52,500 square feet were affected by this leak and has asked Kaiser to investigate the extent of the contamination.

- Kaiser discovered petroleum contamination while excavating the sulfide scrubber building site. Excavation was performed on a 20 x 20 x 7 foot area.

2001 - RIS was revised by Ecology and site ranked 2 by SHD.

2003 - RIS was again revised by Ecology.

2003-2005 - Investigations show PCB contamination in the groundwater down-gradient of casting areas.

2004 - More contamination was found from an oil/emulsion transfer line release. Relying on Exhibit B it appears that Kaiser did nothing to prevent further contamination.

- Six inches of oil was observed in an electrical grounding pit.

2003-2005 - Studies show PCB plume in the area of the hot line and casting areas.

2005 - Recent site investigations show releases from transfer lines connecting the oil reclamation building to the wastewater treatment system.

- In April, a release from a UST for waste oil was detected in the truck shop area.

As discussed, Kaiser has consistently failed to fully detect the extent of the contamination and failed to properly clean it up. We recommend that Ecology take the following actions to ensure that this site is adequately addressed and the history of inadequate remediation is avoided: (1) because of recent releases, continuous groundwater and soil samples should be taken throughout the site to monitor potential new sources of pollutants with Ecology retaining the discretion when sampling should be conducted and measures that allow Ecology to perform its own independent sampling at Kaiser's expense; (2) Ecology should retain the discretion to perform studies necessary to determine the scope and area of contamination to be studied and remediate, should data suggest that an expansion of the site is warranted; and (3) Ecology should dedicate staff, at Kaiser's expense, to carefully control and monitor the studies and remediation measures implemented by Kaiser.

Despite the history of contaminant releases, Kaiser continues to release contaminants. Any cleanup efforts should be postponed until these releases are stopped. It is futile to perform remediation on sites that have the potential to be re-contaminated. Accordingly, Ecology must restrict any expansion of Kaiser operations until assurances exist to prevent future contamination of the site and the Spokane River.

For these reasons, Sierra Club recommends that Ecology take a larger role in the oversight and implementation of the remediation effort at the site and not allow Kaiser to continue their poorly performed studies and remediation effects. Thank you for the opportunity to comment and provide suggestions on this matter.

Sincerely,



Bonne Beavers
on behalf of the Sierra Club