



## Kaiser Aluminum Proposed NPDES Discharge Permit

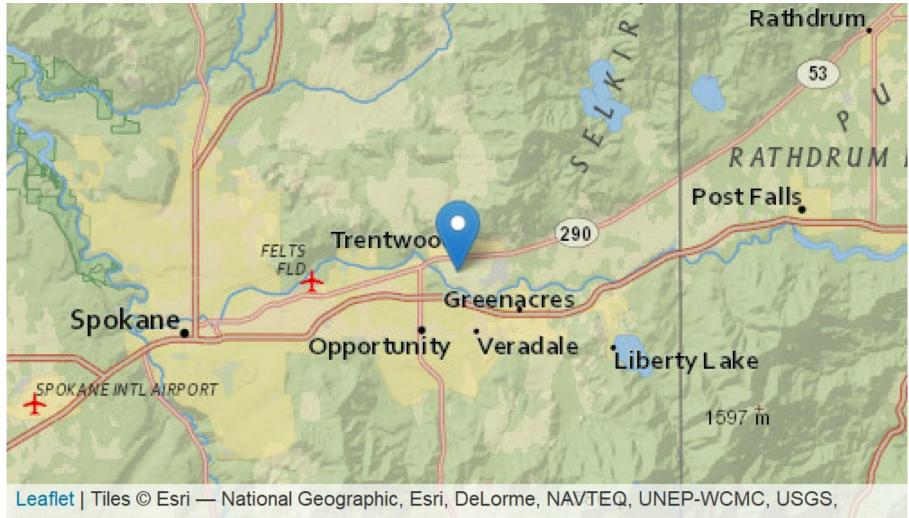
Pat Hallinan

## Kaiser Aluminum

- Aluminum Rolling Mill and Metal Finishing Plant
  - Produces aluminum sheet, plate, and coil
- Wastewater Discharge to the Spokane River (average 6.2 MGD)
  - Treated process wastewater
  - Non-contact and contact cooling water
  - Stormwater
  - Plant sanitary wastewater
- Historic Releases/Cleanup Activities
  - Cleanup of polychlorinated biphenyl (PCB) contamination in groundwater is ongoing under the Model Toxics Control Act (MTCA)



#### **Site Location**



#### **Site Overview**



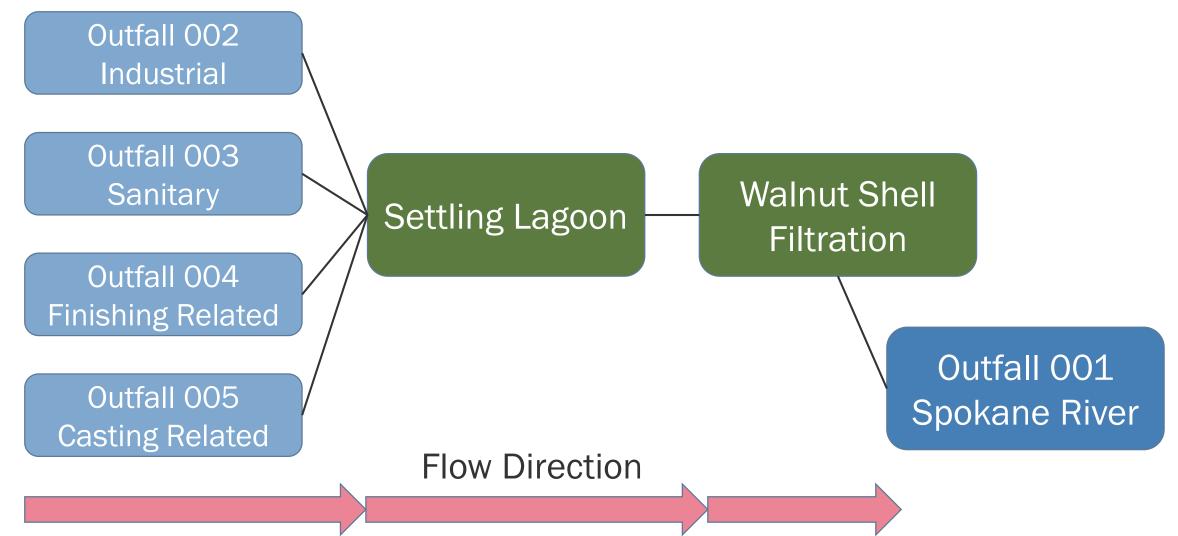


## Kaiser Groundwater Cleanup Status

- Testing ultra-violet light technology to destroy PCBs is ongoing
  - Initial results are showing high levels of destruction
  - Improvements to the system continue
  - Final decision for full-scale treatment technology will occur in 2022
- Project Website:
  - <u>https://apps.ecology.wa.gov/gsp/Sitep</u> age.aspx?csid=7093



#### **Treatment Overview**



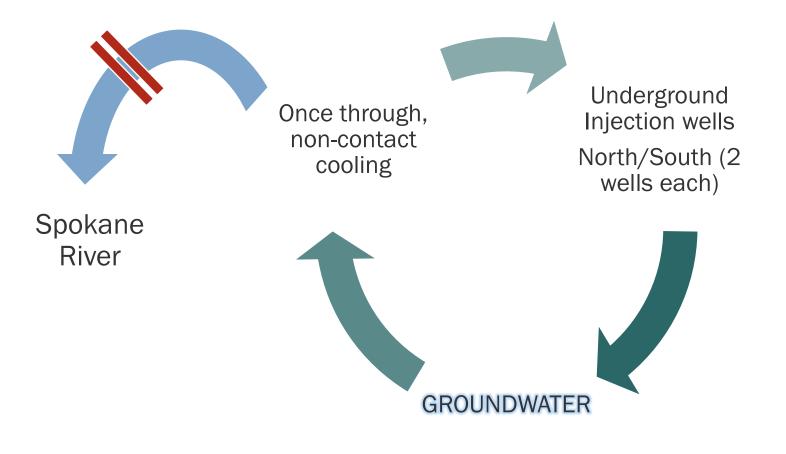
### **Treatment Overview**





## Flow Reduction Efforts

#### Underground Injection Control (UIC) Program



# NPDES Basics

#### Effluent Limitations (Limits)

- Technology Based
  - Federal Effluent Guidelines
  - Case-by-case determinations
- Water Quality Based
  - Evaluate Critical Effluent and Receiving Water Conditions (Reasonable Potential Determination)
  - Water Body Impairments
  - Total Maximum Daily Load (TMDL) Requirements

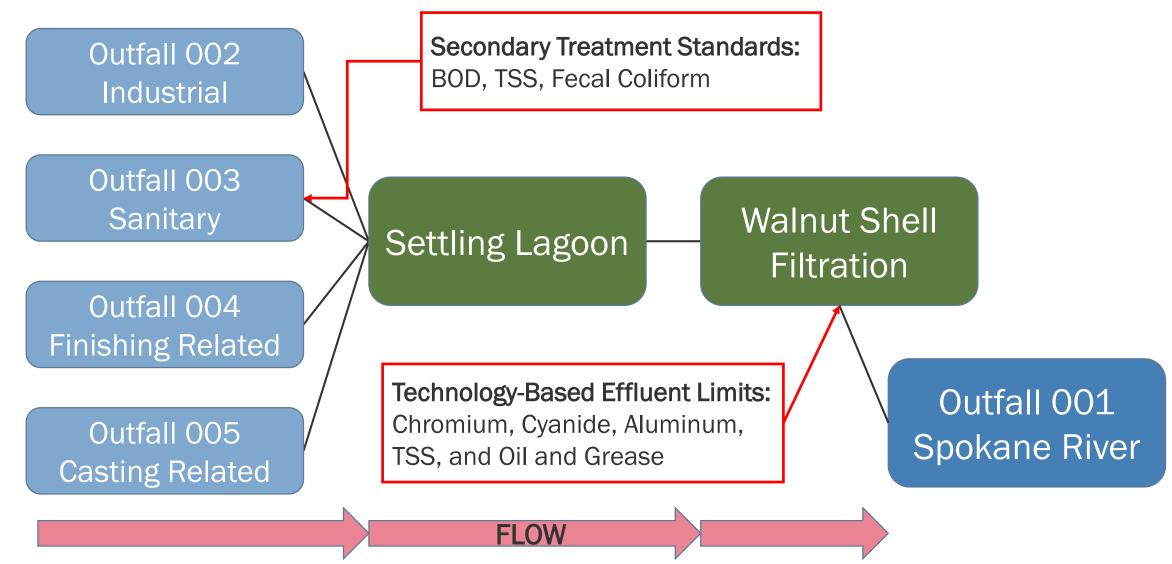
# Water Quality Assessment - Category 5

PARAMETER_NAME	CATEGORY	Status	WATERBODY_NAME	MEDIUM_NAME
Polychlorinated Biphenyls (PCBs)	5	Current	SPOKANE RIVER	Tissue
Temperature	5	Current	SPOKANE RIVER	Water
2,3,7,8-TCDD (Dioxin)	5	Current	SPOKANE RIVER	Tissue
Polychlorinated Biphenyls (PCBs)	5	Draft	SPOKANE RIVER	Tissue
Temperature	5	Draft	SPOKANE RIVER	Water
2,3,7,8-TCDD (Dioxin)	5	Draft	SPOKANE RIVER	Tissue

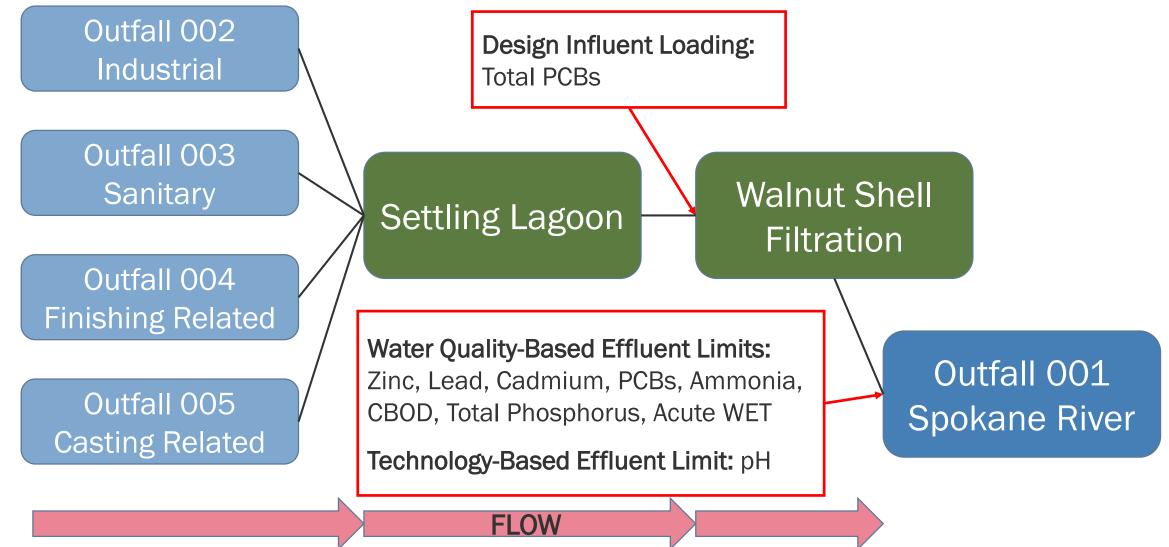
## Water Quality Assessment - Category 4a

PARAMETER_NAME	CATEGORY	Status	WATERBODY_NAME	MEDIUM_NAME
Zinc	4A	Current	SPOKANE RIVER	Water
Lead	4A	Current	SPOKANE RIVER	Water
Zinc	4A	Draft	SPOKANE RIVER	Water
Lead	4A	Draft	SPOKANE RIVER	Water

### **Proposed Effluent Limits**



## **Proposed Effluent Limits**



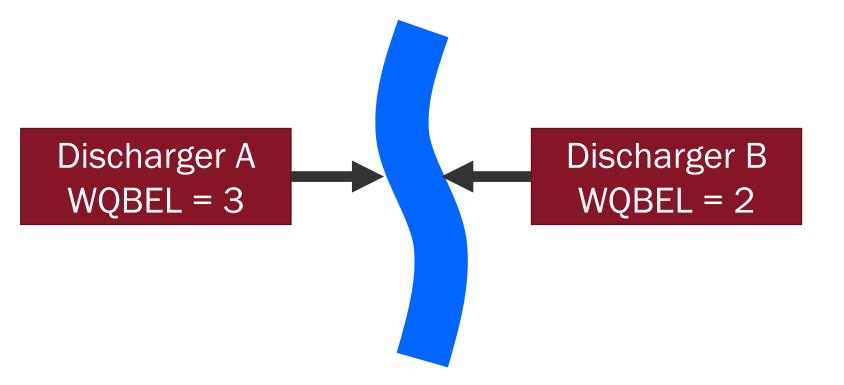
# Water Quality Based Effluent Limits Key Changes

#### **Proposed Limits**

- Cadmium, Lead, and Zinc
- Total PCBs
- Whole Effluent Toxicity (WET) Limit
- Ammonia
- Total Phosphorus (Bubble Limit)
- Carboneaous Biochemical Oxygen Demand (CBOD<sub>5</sub> - Bubble Limit)

#### **Proposed Additional Data Collection**

• Temperature

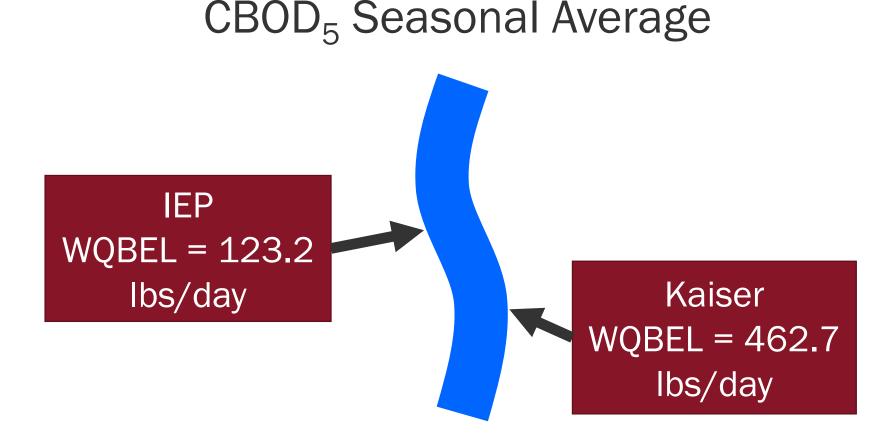


What is a Bubble Limit?

> An individual discharger would not be considered in violation of their <u>water quality based effluent</u> <u>limit (WQBEL)</u>, as long as the collective bubble limit is met during the same reporting period



# What is a Bubble Limit?



IEP < 123.2, then Kaiser limit = 462.7+[(123.2 - IEP load) x 14.9]

IEP  $\geq$  123.2, then Kaiser limit = 462.7

## **Other Permit Conditions**

Agreed Order

- Negotiated following delayed re-issuance of previous permit (expired in 2016)
- PCB pollutant minimization plan (PMP)
  - Includes implementation of flow reduction projects
  - Continued participation in SRRTTF
  - Characterization testing using EPA method 1668
- Cooling water intake structure (CWIS) report
- Spokane River temperature monitoring
- Schedule for installation of 'next level of treatment' for PCBs

## **Compliance Schedule**

#### Implement 'Next Level of Treatment' for PCBs

#### Jan 2025

- Bench Scale Results
- Proposed Schedule for Pilot Testing

#### Jan 2029

- Pilot Scale Results
- Proposed Schedule for Engineering Report

#### Jan 2030

 Engineering Report and Plans & Specifications

#### Jan 2031

Completion of
Construction

### **PCB PMP – Flow Reduction Actions**

Flow reduction projects and target completion dates

2023 Q4	2025 Q1	2025 Q2	2026 Q2	2029 Q1
CC, HT Systems, South Production Area	CC, South Area Facility Modernization	UIC <b>Phase 3</b> , NCC, Casting	UIC <b>Phase 4</b> , Misc. Cooling Systems	CC Casting
	<b>se 4</b> = ~1 0 mgd			

= ~1.0 mgd

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CC – Contact Cooling;

HT – Heat Treatment;

NCC – Non-Contact Cooling



# **Thank You!**



#### Pat Hallinan

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Spokane River Watershed Webpage: https://ecology.wa.gov/Issues-andlocal-projects/Environmentalprojects/Improving-Spokane-Watershed