

## Waste Material Discovery

- Waste material encroached onto Alton & Southern (A&S) property
- Waste materials include
  - bauxite residue ("red mud")
  - gypsum
- Constituents driving action: radium-226, radium-228, and metals





### At the time of the discovery.....

 A&S was finalizing the design for a new railroad track expansion project

 Alcoa was well into Consent Decree (CD) negotiations with agencies

#### As a Result of the Discovery....

A&S would be named a responsible party to the North Alcoa Site Superfund project (OU-1)







North Alcoa Superfund Site Stakeholders





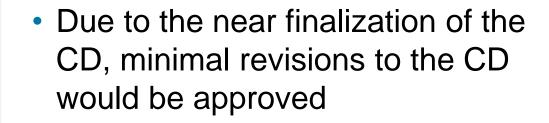
## Multiple Challenges Include...

- Legal
  - Identify components of CD that impact 3<sup>rd</sup> Rail project
- Technical
  - Develop a design that satisfies the requirements of both the CD and the 3<sup>rd</sup> Rail project
  - Demonstrate to agencies that the end use of an active track is feasible
  - Ensure designs match where the A&S portion of the OU-1 remedy meets with adjacent remedy
- Minimize project delays to the extent practical





# Addressing Legal Challenges



- Approved revisions did include
  - Fencing modification (security)
  - Storm water management

Key strategy – reference design in CD

 Rely on design and remedial action work plan to illustrate project specifics





# Design Requirements

A&S Remedy

- Gabion retaining wall
- Soil Cover
  - Remove 2-feet of soil including any waste material
  - Import 2-feet of clean soil
  - Install geotextile fabric
  - Stabilize soil cover

3<sup>rd</sup> Rail **Project** 

- Railroad track and sub-ballast
- Adjacent gravel access road
- Vegetated drainage ditch

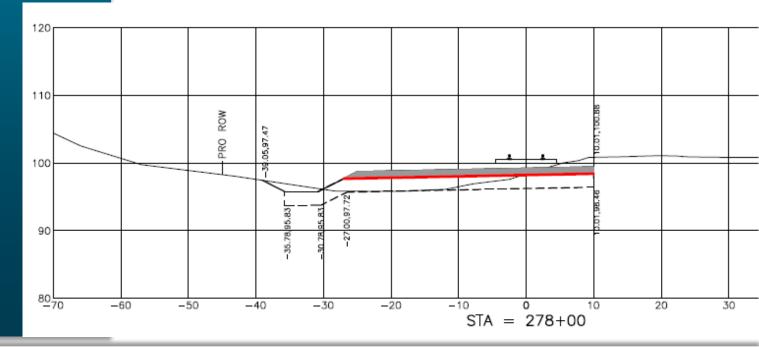




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# Technical Challenge: Beyond Typical Track Construction

- Waste material excavation
- Import clean soil cover
- Geotextile between soil cover & track sub-ballast
- Contingency plans for unsuitable material and voids







# Technical Challenge: Agency Concerns

- Agency deemed the building of a railway over a soil cover "non typical reuse"
- Agency requested additional information to ensure:
  - Short and long term soil cover stability
  - Design includes consideration for physical properties of bauxite waste residue





Technical Challenge: Addressing Agency Concerns

Typical track construction requires very stable subsurface

Stability of the track
= Stability of the
soil cover

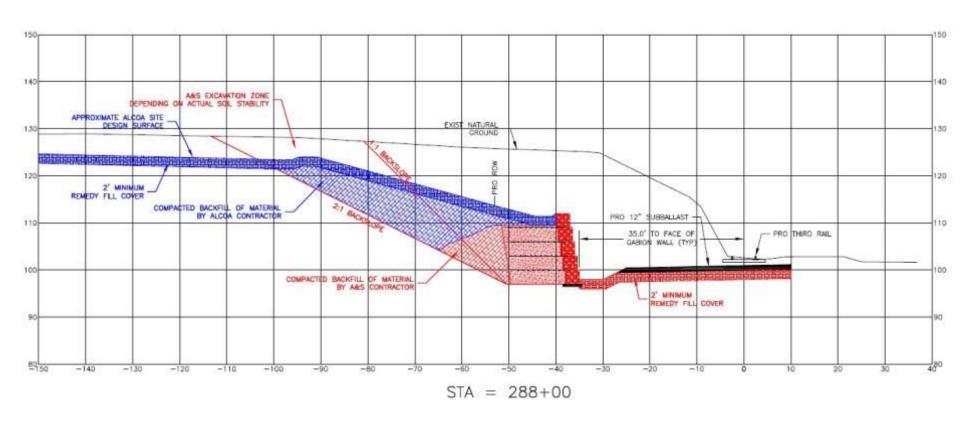
Subgrade material must meet track construction specs or be removed

Track maintenance includes monitoring of subgrade integrity





# Technical Challenge: Match Line







# Remedy Construction Sequencing







# Health and Safety First!

 Level-C for the first week until air samples could be collected and analyzed for worker protection



- Real-time dust monitoring
- Perimeter air monitoring
- Real-time radiological surveys
- Radiological exposure monitoring





#### **Gabion Wall**









# Remedy Implementation











# Construction Challenges: Unsuitable Material

- Placement of gravel under gabion wall instead of soil to obtain needed compaction
- Over excavation of waste material unsuitable for track construction and placement of gravel for stabilization









# Construction Near Completion!

- 3rd Rail track in full operation
- Site restoration activities outstanding
- Operation and maintenance will continue to ensure remedy integrity







# Precedent-Setting Results

- Developed and implemented plan that addressed CD and 3rd Rail objectives
- USEPA, Region V 3rd Rail Project the first operational railroad constructed on a Superfund Site!





