



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

January 16, 2025

John DeJong
Union Pacific Railroad Company
4315 East Sprague Avenue
Spokane Valley, WA 99212

Re: Status of Enforcement Order No. 20752 and No Further Action to complete Cleanup of the following Contaminated Site:

- **Site Name:** Aluminum Recycling Trentwood
- **Site Address:** 2317 N Sullivan Rd, Spokane Valley WA 99216
- **Cleanup Site ID:** 1081
- **Facility/Site ID:** 628

Dear John DeJong:

Thank you for working with the Washington State Department of Ecology (Ecology) on the Aluminum Recycling Trentwood site (Site) under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW, and Enforcement Order No. 20752 (Order), which became effective on September 17, 2021.

This letter provides written notification that, under MTCA and the Order, no further remedial action is necessary to clean up contamination at the Site, but further remedial action is still necessary to control and monitor the remaining contamination and periodically review conditions at the Site. This letter also describes the status of the Order and the Site.

Completion of Cleanup Required by Order

The remedial actions required by the Order are specified in Section VII (Work to Be Performed) and detailed in the Cleanup Action Plan (Exhibit C). Union Pacific Railroad Company (UP) was required to excavate and dispose off-site all soil exceeding cleanup levels on the Washington State Department of Transportation and Pentzer Venture Holdings II properties; to excavate and dispose off-site all soil exceeding remediation levels on the UP property; and to consolidate and cap all soil exceeding cleanup levels, but below remediation levels on the UP property. After inspecting the Site and reviewing the supporting documentation, Ecology has determined that the cleanup required at the Site under the Order has been satisfactorily completed.

Post-Cleanup Remedial Actions Required by Order

Although the cleanup of contamination at the Site has been completed, further remedial action is still necessary under MTCA and required under the Order to control and monitor the remaining contamination at the Site. UP's responsibilities are specified in Section VII (Work to Be Performed) and detailed in the Cleanup Action Plan and Compliance Monitoring Plan. A Site is defined as any property where contamination has come to be located. Since contamination was fully removed from both the Pentzer Venture Holdings II and Washington State Department of Transportation properties, the Site is now only defined as the UP property; post-cleanup remedial actions will only apply to the UP property.

Periodic Reviews of Post-Cleanup Conditions Required by Order

Ecology will conduct periodic reviews of post-cleanup conditions at the Site to ensure they remain protective of human health and the environment. This requires continued access to the Site, as provided in Section VIII(D) (Access) of the Order. UP's responsibilities are specified in Section VIII(O) (Periodic Review) of the Order. Any costs incurred by Ecology in conducting periodic reviews may be recovered from UP.

Status of Order

Although the cleanup of contamination at the Site has been completed, further remedial action is still necessary under MTCA and required by the Order to control and monitor the remaining contamination and periodically review the conditions at the Site. The Order will remain in effect until the required post-cleanup remedial actions are completed or are no longer necessary under MTCA.

This letter summarizes UP's remaining responsibilities under the Order; it does not alter or expand UP's responsibilities under the Order.

No Further Action Determination

Ecology has determined that no further remedial action is necessary to clean up contamination at the Site under MTCA. However, as explained above, further remedial action is still necessary under MTCA to control and monitor the remaining contamination and periodically review the conditions at the Site.

Delisting of the Site

Based on the no further action determination, Ecology proposed removing the Site from the Hazardous Sites List (HSL). Ecology published notice of the proposal in the Site Register on November 14, 2024 and provided a 30-day public comment period, from November 4, 2024 to December 4, 2024. No comments were received. After review and consideration of the comments, Ecology removed the Site from the HSL on January 13, 2025. The removal will be reflected in the next publication of the HSL in the Site Register.

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Thank You

Thank you and congratulations on your work in cleaning up the Site. We look forward to continuing to work with you to make sure your investment in the Site is protected over the long term. Should you have any questions, please do not hesitate to contact Ecology's cleanup project manager for the Site, Sandra Treccani, at 509/724-1205 or satr461@ecy.wa.gov.

Sincerely,



Nicholas Acklam
Section Manager
Toxics Cleanup Program, ERO

cc: Ivy Anderson, Office of the Attorney General
Michael Schuster, Ecology
Ecology Site File