Kennedy Jenks

16 September 2025

Ms. Sandra Treccani
Site Manager
Washington State Department Ecology
4601 North Monroe Street
Spokane, Washington 99205

Subject: Cap Integrity Monitoring
BNSF Railway Company, Hillyard Dross Cap
Spokane, Washington
KJ 2596114*00

Dear Ms. Treccani:

This letter provides the results of compliance monitoring and maintenance activities conducted in 2025 at the BNSF Railway Company (BNSF) Hillyard Dross Cap site (Site), located at the southwestern intersection of Wellesley Avenue and Ferrall Street in Spokane, Washington. The Site is also referred to as the Aluminum Recycling Corporation Site in the Washington State Department of Ecology (Ecology) Consent Decree No. 01202037-9 (Ecology 2001).

The dross encapsulation cell (cap) and associated stormwater system were constructed between 2001 and 2003. The dross cap consists of a low permeability, 40-millimeter-thick, high-density polyethylene (HDPE) geomembrane placed over the graded and prepared dross and soil surface. The geomembrane is overlain by 18 to 30 inches of rounded gravel that acts as a drain to shed water off the geomembrane. A woven, permeable HDPE geotextile fabric is placed above the gravel and covered with approximately 18 inches of topsoil. The topsoil was hydroseeded upon installation.

Stormwater from the dross cap is directed to a channel along the perimeter of the cap, which drains either directly to the stormwater retention pond or to a sump located in the western portion of the Site. Stormwater that drains to the sump is pumped to the retention pond. Secondary overflow from the retention pond is routed to an onsite drywell.

Compliance monitoring and maintenance activities in 2025 consisted of annual remedial component system checks and maintenance performed consistent with the approved Operations and Maintenance Plan (O&M Plan). The annual inspection was completed on 3 April 2025 and included assessment of the following: (1) the dross cap; (2) the stormwater conveyance, evaporation, and disposal system; and (3) other physical facilities such as access roads, setbacks, and fencing.

No erosion or settlement of the dross cap was observed during the inspection. Grasses and forbs were abundant on and surrounding the dross encapsulation cell during the growing season and were dormant during dry months, as is normal.

During inspection of the stormwater conveyance, evaporation, and disposal system components, the water level in the West Sump was observed to be higher than normal, indicating the need to inspect the pump. Results of the inspection identified the need to replace the pump, slide rail and receiving plate. The replacement work was completed on 29 August 2025.

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The evaporation pond that collects Site stormwater is located directly northeast of the dross encapsulation cell. Water level elevations measured in the pond are referenced to the North American Vertical Datum of 1988. Post-construction evaporation pond water level elevations are presented in Attachment A. The evaporation pond was not observed to be discharging to the overflow sump and drywell on 3 April 2025.

Other physical features such as access roads and setbacks appeared to be in good condition at the time of the inspection. The following conditions were noted during the annual inspection completed on 3 April 2025:

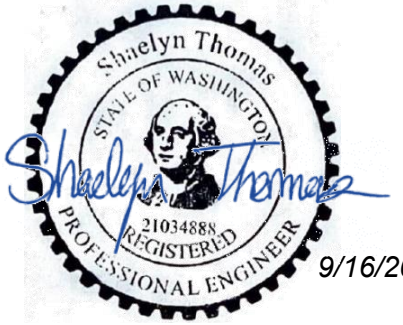
- Fence posts in the northeastern corner of the fence surrounding the dross cap were leaning, but the fence panels were stable and not in need of repair.

Site photograph logs from the field inspection and pump replacement activities have been included as Attachment B.

The next compliance monitoring event is scheduled to occur during the second quarter of 2026. Please contact us at (503) 423-4033 if you have questions or concerns about the cap integrity monitoring.

Very truly yours,

Kennedy/Jenks Consultants, Inc.



9/16/2025

Shaelyn Thomas, P.E.
Project Manager

Attachments:
Attachment A – Summary of Evaporation Pond Water Levels
Attachment B – Site Photographs

cc: Shane DeGross, BNSF Railway Company

Attachment A

Summary of Evaporation Pond Water Levels

Attachment A: Summary of Evaporation Pond Water Levels

Date Measured	Water Level Elevation[(a)] (feet)
8/26/2003	2,035.85
9/25/2003	2,035.64
10/30/2003	2,035.50
11/26/2003	2,035.60
12/22/2003	2,036.64
1/28/2004	2,038.77
02/20/04[(b)]	2,039.18
3/16/2004	2,039.08
4/19/2004	2,038.64
5/20/2004	2,038.10
6/16/2004	2,038.81
7/26/2004	2,037.98
8/23/2004	2,037.73
9/13/2004	2,037.48
10/15/2004	2,037.52
11/8/2004	2,037.48
12/15/2004	2,038.52
01/28/05[(b)]	2,039.12
2/16/2005	2,039.06
3/10/2005	2,039.00
4/20/2005	2,039.02
5/14/2005	2,038.93
6/9/2005	2,039.02
7/14/2005	2,038.77
8/15/2005	2,037.77
9/27/2005	2,036.85
10/21/2005	2,037.85
11/3/2006	2,038.02
12/16/2006	2,037.85
01/17/06[(b)]	2,039.10
02/03/06[(b)]	2,039.10
03/17/06[(b)]	2,039.10
04/14/06[(b)]	2,039.10
05/03/06[(b)]	2,039.10
6/7/2006	2,038.18
7/6/2006	2,038.85
8/31/2006	2,038.85
9/13/2006	2,038.77

Attachment A: Summary of Evaporation Pond Water Levels

Date Measured	Water Level Elevation[a] (feet)
10/30/2006	NM
11/13/2006	2,038.89
12/4/2006	2,038.93
01/04/07[b]	2,039.14
02/02/07[c]	NM
03/06/07[b]	2,039.10
4/7/2007	2,036.87
5/3/2007	2,036.90
6/1/2007	2,038.94
07/03/07[c]	NM
8/1/2007	2,037.70
9/7/2007	2,037.07
10/9/2007	2,037.17
11/19/2007	2,037.24
12/20/2007	2,038.64
1/29/2008	2,039.39
2/6/2008	2,039.31
3/17/2008	2,039.39
04/04/08[b]	2,039.41
5/1/2008	2,039.27
6/16/2008	2,039.03
7/4/2008	2,038.69
8/5/2008	2,037.99
9/10/2008	2,037.59
10/7/2008	2,037.38
11/11/2008	2,037.56
12/5/2008	2,037.59
01/09/09[b]	2,039.57
02/22/09[b]	2,039.49
03/10/09[b]	2,039.55
04/09/09	2,039.39
5/4/2009	2,039.21
6/5/2009	2,038.79
7/10/2009	2,038.28
8/13/2009	2,037.69
9/8/2009	2,037.34
10/5/2009	2,036.65
11/12/2009	2,037.54

Attachment A: Summary of Evaporation Pond Water Levels

Date Measured	Water Level Elevation[(a)] (feet)
12/7/2009	2,037.75
01/19/10[(b)]	2,039.48
02/17/10[(b)]	2,039.49
03/08/10[(b)]	2,039.41
4/22/2010	2,039.32
5/12/2010	2,039.21
6/4/2010	2,039.30
7/30/2010	2,038.88
8/20/2010	2,038.47
9/9/2010	2,038.18
10/11/2010	2,038.07
11/10/2010	2,038.42
12/10/10[(b)]	2,039.59
01/20/11[(b)]	2,039.49
02/17/11[(b)]	2,039.48
03/21/11[(b)]	2,039.49
04/09/11[(b)]	2,039.45
5/11/2011	2,039.39
06/10/11[(b)]	2,039.49
7/8/2011	2,039.09
8/8/2011	2,038.39
9/21/2011	2,037.39
10/12/2011	2,037.90
11/17/2011	2,037.89
12/9/2012	2,037.99
1/11/2012	2,038.29
02/16/12[(b)]	2,039.49
03/14/12[(b)]	2,039.49
04/07/12[(b)]	2,039.49
05/15/12[(b)]	2,039.37
6/12/2012	2,039.18
7/12/2012	2,038.79
8/22/2012	2,039.09
9/14/2012	2,037.51
10/22/2012	2,037.09
November 2012[(b)(d)]	NA
12/12/12[(b)]	2,039.37
01/15/13[(b)]	2,039.27

Attachment A: Summary of Evaporation Pond Water Levels

Date Measured	Water Level Elevation[(a)] (feet)
10/24/2013	2,038.09
11/19/2013	2,038.09
12/18/2013	2,038.15
1/29/2014	2038.69
2/26/2014[(b)]	2,039.29
3/28/2014 [(b)]	2,039.23
4/23/2014	2,039.13
5/28/2014	2,038.84
6/17/2014	2,038.61
7/28/2014	2,038.12
8/21/2014	2,037.39
9/17/2014	2,038.39
10/24/2014	2,038.31
11/25/2014	2,037.52
12/11/2014	2,038.39
1/29/2015	2,039.39
2/20/2015	2,039.36
3/31/2015	2,039.39
4/24/2015	2,039.20
5/22/2015	2,038.89
6/25/2015	2,038.30
7/14/2015	2,037.94
8/10/2015	2,037.44
9/30/2015	2,036.84
10/28/2015	2,036.69
11/23/2015	2,036.78
12/18/2015	2,037.99
1/26/2016	2,039.41
2/25/2016	2,039.37
3/21/2016	2,039.44
4/22/2016	2,039.22
5/27/2016	2,039.01
6/28/2016	2,038.49
7/19/2016	2,038.09
8/18/2016	2,037.59
9/23/2016	2,037.04
10/21/2016	2,037.95
11/14/2016	2,039.39

Attachment A: Summary of Evaporation Pond Water Levels

Date Measured	Water Level Elevation[(a)] (feet)
12/22/2016	2,039.45
1/31/2017	2,039.47
2/27/2017	2,039.53
3/16/2017	2,039.49
4/19/2017	2,039.53
5/17/2017	2,039.43
6/15/2017	2,038.95
6/27/2018	2,038.59
4/23/2019	2,039.48
4/29/2020	2,039.19
4/6/2021	2,039.39
4/29/2022	2,039.19
5/17/2023	2,039.31
4/4/2024	2,039.05
4/3/2025	2,039.27

Notes:
(a) Pond water surface elevation relative to NAVD 88. Water level elevation corresponds to the event gauge reading at the pond plus a base elevation of 2,036.59 feet mean sea level (MSL).
(b) Water within the pond was discharging to overflow sump.
(c) Not measured because the pond's staff gauge shifted position, requiring maintenance during subsequent operation and maintenance (O&M) visit.
(d) Water level was within normal range for the time of year. However, a precise water level is not available.
NM = not measured.
NA = not available.

Attachment B

Site Photographs

Hillyard Dross Cap Inspection

PROJECT IMAGE DOCUMENTATION
April 3, 2025

East edge of Cap pond where trees were previously removed

Pond water level

Water filling in West Pump Vault indicating need for repairs

Bent fence post on eastern border of Cap

Hillyard Dross Cap Inspection

PROJECT IMAGE DOCUMENTATION
August 29, 2025

New West Vault Sump Pump Installation