



January 13, 2026

Reference No. US0039040.7852-Rev1

**Sandra Treccani**

Department of Ecology  
Eastern Regional Office  
4601 N. Monroe, Suite 202  
Spokane, WA 99205

**ALUMINUM RECYCLING TRENTWOOD SITE, UNION PACIFIC RAILROAD - 2025 INSPECTION REPORT**

Dear Sandra,

WSP USA, Inc. (WSP) has completed the 2025 annual inspection at Union Pacific Railroad's (UPRR) Aluminum Recycling Trentwood Site in Spokane County, Washington. The remedial action implemented at the Trentwood Site, including the ecological cap design, surface water management system, and site security, is documented in the *Cleanup Action Report, Union Pacific Railroad, Aluminum Recycling Trentwood Site* issued on May 3, 2024. The remedial action was completed in 2023 and were in accordance with the requirements of the Washington State Department of Ecology's (Ecology) Enforcement Order No. DE 20752, issued to UPRR in 2021 and the Washington Administration Code (WAC) 173-340-400(4)(a). The site is identified by the Washington Department of Ecology as Facility Site ID 628 and Cleanup Site ID 1081.

**Inspection**

The 2025 inspection was performed in accordance with the Inspection and Maintenance Plan presented in the *Engineering Design Report, Union Pacific Railroad, Aluminum Recycling Trentwood Site* issued on May 17, 2022. The inspection performed on October 1st, 2025, showed the cap is in good condition and is functioning as intended.

**Maintenance**

Maintenance was performed in accordance with the Inspection and Maintenance Plan presented in the *Engineering Design Report, Union Pacific Railroad, Aluminum Recycling Trentwood Site* issued on May 17, 2022. GrayMar Environmental placed a 6-inch thick layer of ecological cap gravel on the observed geotextile exposures on December 9th, 2025.

If you have any questions, please contact the undersigned.

**WSP USA, INC.**



Mia Grasso, EIT  
*Consultant*



Kate DaPolito, WA PE  
*Senior Consultant*



Thomas E. Neely, WA LG, LHG  
*Vice President*

MG/KD/rm

Attachments: Attachment A - 2025 Inspection Report  
Attachment B - 2025 Inspection Report Addendum 1

[https://wspnlinenam-my.sharepoint.com/personal/rebecca\\_morin\\_wsp\\_com/documents/meetings/documents/docs without a home/us0039040.7852/capinspection2025\\_transmittalletter\\_rev1.docx](https://wspnlinenam-my.sharepoint.com/personal/rebecca_morin_wsp_com/documents/meetings/documents/docs%20without%20a%20home/us0039040.7852/capinspection2025_transmittalletter_rev1.docx)

**ATTACHMENT A**

# 2025 Inspection Report

**Site:** Union Pacific Railroad – Aluminum Recycling Trentwood Site

**Date/Time of Inspection:** 10/01/2025 10:00 am

**Inspected by (print name):** Mia Grasso

**Weather:** 52 F, partly cloudy, little to no wind

## Ecological Cap Inspection

### General:

The Union Pacific Railroad (UPRR) property, Spokane County Parcels 45114.9030 and 45114.9181, remain capped as required by the Enforcement Order DE 20752 (Ecology 2021) and as documented in the Cleanup Action Report (WSP 2024), providing a barrier to human and ecological receptor direct contact with underlying site soils and is functioning as intended. During the 2025 annual inspection, geotextile was visible in a few locations, but none of these locations exposed site soils; therefore, it is concluded the cap is still functioning as intended.

Vegetation was observed in some areas of the cap. No signs of erosion, ponding, settlement, or slope failure of the ecological cap were observed. The surface water features and site security features appeared to be in good condition.

### Ecological Cap:

Geotextile was visible at a few locations including near the access point, west of the overflow channel, at the northeast corner of the property, and along the north ditch (see Photographs 3C-3D, 7B, 8B, 9B-9F). Underlying soil was not observed at any of these locations indicating the ecological cap is still functioning as intended. The geotextile exposures appear to be a result of thin rock coverage.

### Surface Water Management System:

The surface water features, including the berms, railroad ditch, and overflow channel, all appeared to be in good condition (see Photographs 4, 6, 7, 9, 10, and 11).

### Security:

The site security features, including the site entrance gate and security fencing, all appeared to be in good condition (see Photographs 2, 8, 11, 12, 13, and 14).

### Additional Notes:

- 1) The 2024 inspection recommended a barricade be placed across the access point to limit vehicular traffic. Ecology blocks were observed across the access point in 2025 which meet the barricade recommendation (see Photograph 3A).
- 2) In the 2024 inspection, an area approximately 5-feet by 6-feet of damaged geotextile and exposed underlying material was noted. In 2025 this area was observed to be repaired (see Photograph 3B).

- 3) Evidence of driving (tire tracks) was observed on the ecological cap and railroad ditch. These tracks resemble those shown in the 2024 inspection photos (see Photographs 10B, 11, and 13).
- 4) There has been an increase in vegetation in areas of the ecological cap, most notably along the bottom edge of the south slope and along the north ditch (see Photographs 1, 2, 5, 9A, and 9C).

### **Recommendations**

- 1) Monitor vegetation growth during the 2026 annual inspection.
- 2) Place 6-inches of ecological cap gravel on the observed geotextile exposures to anchor the geotextile and protect the cap from potential damage and monitor these areas for worsening conditions. Ecological cap gravel shall be angular to subangular, sound, hard, durable natural rock conforming to the requirement so the WSDOT 9-03.9(2) “Permeable Ballast” (i.e. ecological cap gravel previously approved as part of the clean up action).

Note, this recommendation has been addressed by the contractor GrayMar Environmental on December 9<sup>th</sup>, 2025 (see the 2025 Inspection Report Addendum 1 attached for documentation of these repairs).

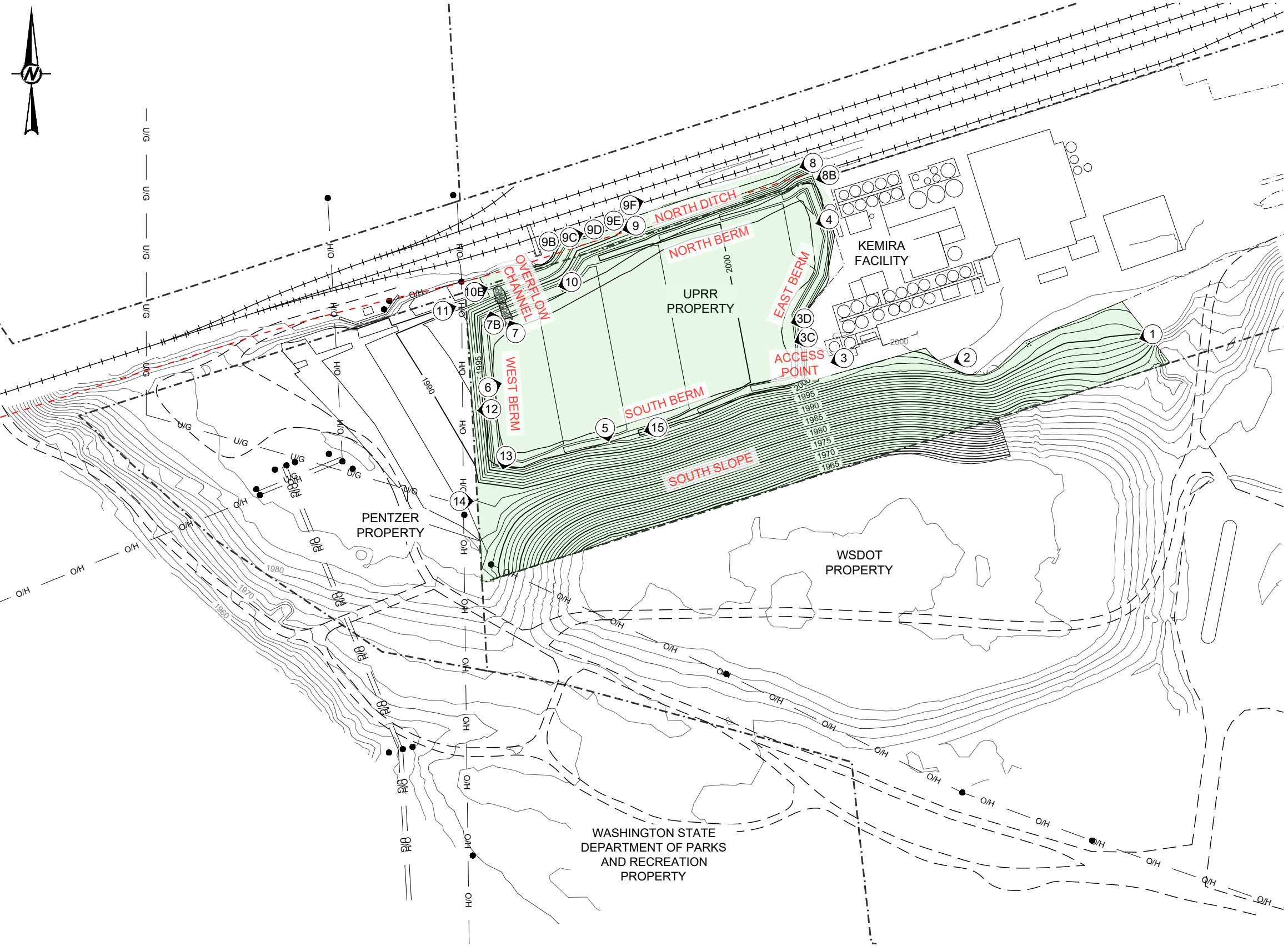
### **References**

- 1) Washington State Department of Ecology (Ecology). 2021. Union Pacific Railroad Company. Enforcement Order No. DE 20752. Aluminum Recycling Trentwood Site. September.
- 2) WSP USA Inc. (WSP). 2024. *Cleanup Action Report Union Pacific Railroad, Aluminum Recycling Trentwood Site*. May 4.

**APPENDIX A**

**2025 Inspection and Maintenance  
Features Figure**

Path: \\uspp-pkhan-wet\USCentralData\USKLC200\genetic\UnserPacRailhead\Trentwood\VA09\_PROJECTS\1911191801\000802\_PROD\PRODUCTION\DWG\_1\_Files\Name\_1911191801\_000802\_PROD\_037.dwg | Last Edited By: usk701463 | Printed By: USK701463 | Date: 2026-01-13 | Time: 10:55:13 AM



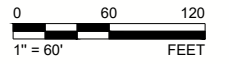
**LEGEND**

- PROPERTY BOUNDARY
- ACCESS ROAD
- RAILROAD TRACK
- POWER POLE
- O/H OVERHEAD POWER LINE
- U/G UNDERGROUND POWER LINE
- APPROXIMATE EDGE OF PAVEMENT
- EXISTING MAJOR CONTOUR (10-FT INTERVAL)
- EXISTING MINOR CONTOUR (2-FT INTERVAL)
- PROPOSED MAJOR CONTOUR (5-FT INTERVAL)
- PROPOSED MINOR CONTOUR (1-FT INTERVAL)
- ECOLOGICAL CAP
- 25FT RAILROAD BUFFER (SEE NOTE 1)
- 1 APPROXIMATE PHOTO LOCATION AND DIRECTION

**NOTE(S)**

1. ALL PERSONNEL WITHOUT PROPER RAILROAD SAFETY TRAINING ARE PROHIBITED FROM ENTERING THE RAILROAD BUFFER ZONE.

**NOT FOR CONSTRUCTION  
DRAFT**



CLIENT  
**UNION PACIFIC RAILROAD CO.**

PROJECT  
**ALUMINUM RECYCLING TRENTWOOD SITE  
INTERIM ACTION - WSDOT DROSS REMOVAL PROJECT  
SPOKANE VALLEY, WASHINGTON**

CONSULTANT		YYYY-MM-DD	2026-01-13
		DESIGNED	KMD
		PREPARED	REDMOND
		REVIEWED	VMN
		APPROVED	TN

TITLE  
**2025 INSPECTION AND MAINTENANCE FEATURES**

PROJECT NO.	PHASE	REV.	FIGURE
US0039040	7852	1	1

1 in IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM .ANSI D

**APPENDIX B**

**Annual Inspection Photograph Log  
October 1, 2025**

**PHOTOGRAPH 1**

Ecological cap south slope overview. View looking west-southwest.



**PHOTOGRAPH 2**

Ecological cap south side slope from Kemira Facility. View looking west-southwest.



**PHOTOGRAPHS 3A, 3B,  
3C, AND 3D**

Kemira facility ecological cap overview and view of newly placed ecological blocks placed to barricade the access point (3A) and closeup of cap area that was compromised in 2024 but has since been remediated (3B). View of two geotextile exposures (3C and 3D). Views looking west.





**PHOTOGRAPH 4**

Ecological cap and berm overview. View looking west.



**PHOTOGRAPH 5**

Ecological cap south slope and WSDOT property below. View looking south.



**PHOTOGRAPH 6**

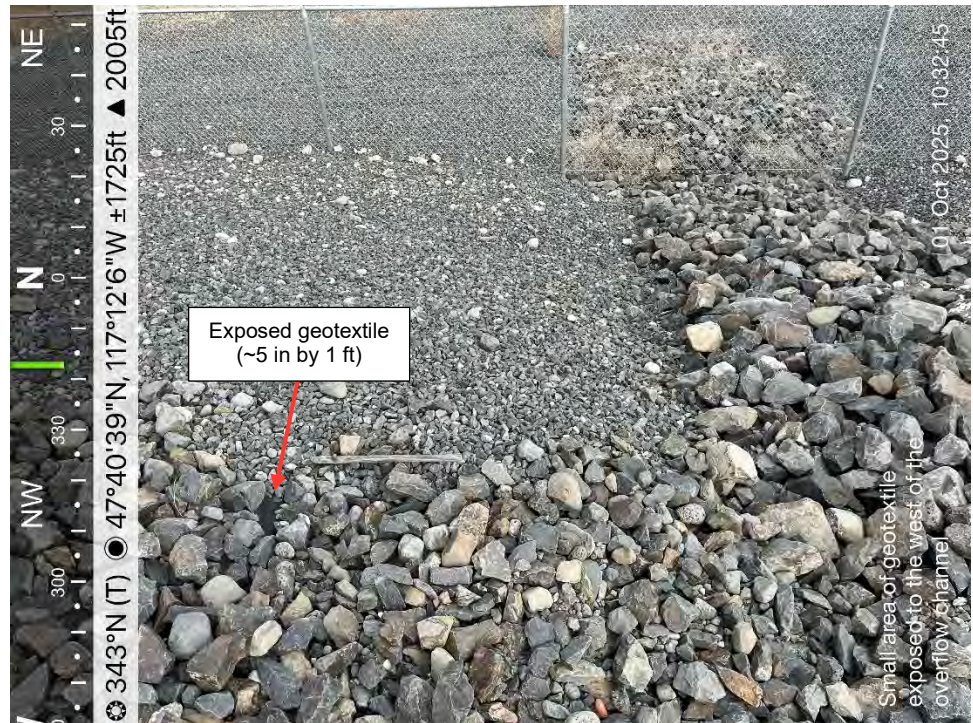
Ecological cap overview.  
Looking east toward Kemira  
facility.



**PHOTOGRAPHS 7A AND  
7B**

Top of Overflow Channel  
(7A). Exposed geotextile (7B).  
Views looking north.





**PHOTOGRAPHS 8A AND 8B**

North berm overview and railroad ditch north side of UPRR property (8A). View of geotextile exposure (8B). View looking west.

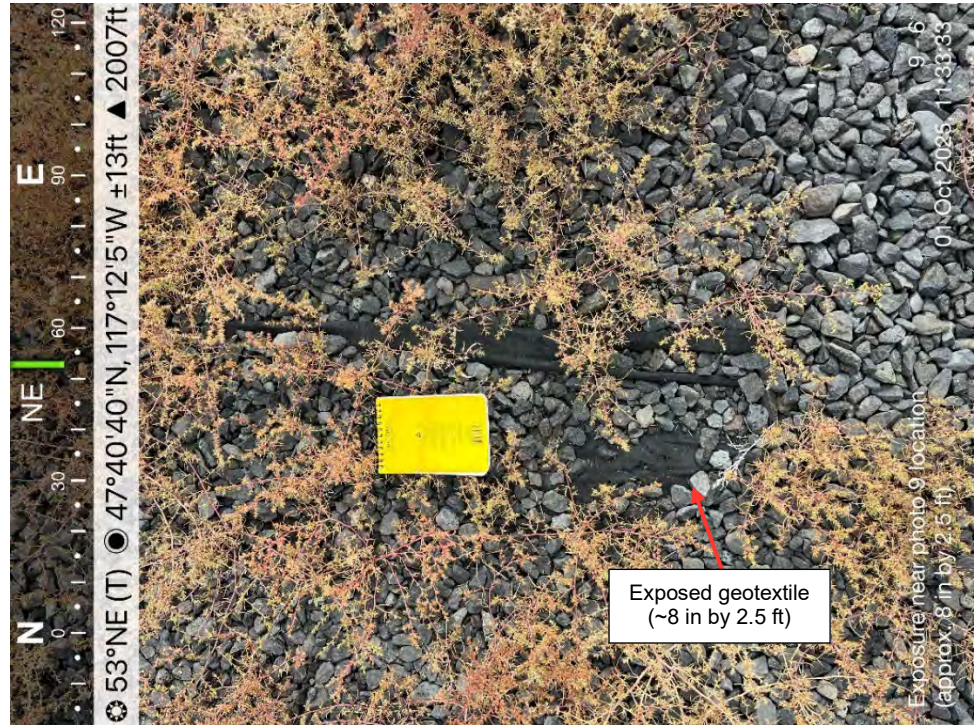


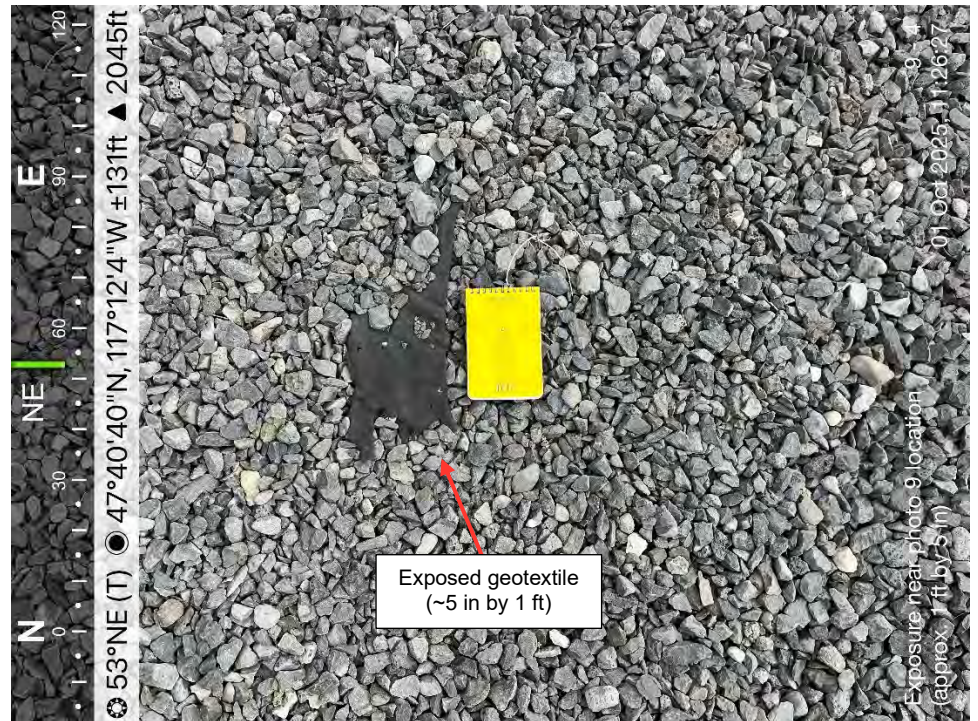


**PHOTOGRAPHS 9A, 9B, 9C, 9D, 9E, AND 9F**

Railroad ditch overview (9A). View looking west. Six geotextile exposures spanned across approximately 50 feet (9B-9F).









**PHOTOGRAPHS 10A AND 10B**

Overflow channel area leading into railroad ditch (10A). View looking west-southwest. Exposed geotextile to the west of the overflow channel outlet (10B). View looking northeast.





**PHOTOGRAPH 11**

Railroad ditch and overflow channel. View looking east-northeast.



**PHOTOGRAPH 12**

West Berm and Pentzer Property. View looking west.



**PHOTOGRAPH 13**

Southwest corner of Ecological Cap and access gate. View looking south-southwest.



**PHOTOGRAPH 14**

UPRR property access gate.  
View looking east.



**PHOTOGRAPH 15**

South berm overview. View looking southwest.



**APPENDIX C**

**Site Inspection Checklist**  
**October 1, 2025**

**Aluminum Recycling Trentwood Site - Dross Removal Project  
INSPECTION CHECKLIST**

Checklist No.: \_\_\_\_\_

Date of Inspection: 10/1/2025 Weather Conditions: 52 F, partly cloudy, little to no wind

Inspected by (print name): Mia Grasso

Signature of Inspector: *Mia Grasso*

Inspection Feature	Photo. No.	Overall Condition G/F/P	Problem Severity 0/1/2	Maintenance Required? N/Y	Notes and Comments
<b>Ecological Cap (incl South Slope)</b>					
Erosion	4, 11	G	0	N	No erosion observed
Ponding	4, 9A	G	0	N	No ponding observed
Settlement	4, 7A, 9A	G	0	N	No settlement observed
Slope Failure	2, 8A, 12, 15	G	0	N	No slope failure observed
<b>Surface Water Facilities</b>					
Berm	4, 8A, 8B, 10A, 15, 3C, 3D	F	1	Y	Geotextile exposures observed
North Ditch	9A-9F	F	1	Y	Vegetation observed, small geotextile exposures observed
Overflow Channel	7A, 7B, 10A, 10B	G	1	Y	Two geotextile exposures observed near overflow channel
Other 1 <sup>(a)</sup>					
Other 2 <sup>(a)</sup>					
Other 3 <sup>(a)</sup>					
<b>Security</b>					
Site Entrance Gates & Locks	13, 14	G	0	N	Gates and locks intact and in good condition
Security Fencing	1, 8A, 9A, 12	G	0	N	Security fencing in good condition
Warning Signs	N/A	--	--	--	N/A
Condition: G = Good F = Fair P = Poor					
Severity: 0 = None or minor, feature appears stable 1 = Moderate, potential for future problems 2 = Major, function presently compromised					
Indicate problem areas on attached map					
(a) See 2025 Inspection Log, Photolog, and Site Map					

**ATTACHMENT B**

**2025 Inspection Report  
Addendum 1**

**Site:** Union Pacific Railroad – Aluminum Recycling Trentwood Site

**Date/Time of Inspection:** 12/09/2025

**Inspected by (print name):** Wesley Scott (GrayMar Environmental)

**Weather:** Overcast, dry, 40°F

## Ecological Cap Inspection

### General:

The 2025 annual inspection for the Union Pacific Railroad (UPRR) property, Spokane County parcels 45114.9030 and 45114.9181 as required by the Enforcement Order DE 20752 (Ecology 2021), was conducted on October 1<sup>st</sup>, 2025. At the time of the inspection, geotextile was visible at a few locations including near the access point, west of the overflow channel, at the northeast corner of the property, and along the north ditch (see Photographs 3C-3D, 7B, 8B, 9B-9F in the October 1<sup>st</sup>, 2025 Photograph Log).

A second site visit was performed by GrayMar Environmental on December 9<sup>th</sup>, 2025 to place 6- inches of ecological cap gravel on the observed geotextile exposures to anchor the geotextile and protect the cap from potential damage.

### Ecological Cap:

GrayMar Environmental, the original remediation contractor, placed 6-inches of ecological cap gravel on the observed geotextile exposures on December 9<sup>th</sup>, 2025. Documentation of the ecological cap gravel placement are provided in Appendix A - Maintenance Record and Appendix B - Photograph Log.

### References

- 1) Washington State Department of Ecology (Ecology). 2021. Union Pacific Railroad Company. Enforcement Order No. DE 20752. Aluminum Recycling Trentwood Site. September.
- 2) WSP USA Inc. (WSP). 2024. *Cleanup Action Report Union Pacific Railroad, Aluminum Recycling Trentwood Site*. May 4.

**APPENDIX A**

**Maintenance Record**  
**December 9, 2025**

Aluminum Recycling Trentwood Site - Dross Removal Project  
MAINTENANCE RECORD

Maintenance Record No.: \_\_\_\_\_

Date(s) of Maintenance: 12/9/25

Weather Conditions: OVERCAST, DRY - 40°

Feature: \_\_\_\_\_

Cross-Reference Inspection Checklist No.: \_\_\_\_\_

Maintenance Contractor:

Name GRAY MAR AUTO MENTAL SERVICES

Address 11023 E MNT SPOKANE PARK DRIVE  
MEAD WA 99021

Phone 509 601 0655

Maintenance Activities: (describe in detail, including any problems or unforeseen conditions; use additional sheets as necessary)

LOCATE EXPOSED FABRIC & PLACE 6" OF ROCK ON TOP OF AREA

Materials and Products: (list and describe all materials and products used for the maintenance activity, including supplier name and location; use additional sheets as necessary)

SICID STEER & DUMP TRAILER FROM CAT RENTAL STORE  
IN LIBERTY LAKE WA,

1 1/4" - 1/4" CHIP PRODUCT 2304 FROM CENTRAL PREMIX  
IN AIRWAY HEIGHTS WA 7 YARDS (10.31 TONS)

**Aluminum Recycling Trentwood Site - Dross Removal Project  
MAINTENANCE RECORD**

Maintenance Record No.: \_\_\_\_\_

**Maintenance Documentation:** (list all photos and / or drawings of maintenance activity, during and after completion of maintenance; attach photos and / or drawings to this record)

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**Did Maintenance Require Changes from Recommended Procedures?**

Yes

No

If yes, describe changes: (use additional sheets as necessary)

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**Additional Maintenance Activities Required for this Feature?**

Yes

No

If yes, describe changes: (use additional sheets as necessary)

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**Maintenance Inspected by (print name):**

Wesley Scott

Organization:

GRAYMARE ENVIRONMENTAL

**Signature of Maintenance Inspector:**



Date:

12/9/25

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From: Tyson Hurst <thurst@graymarenv.com>  
Sent: Wednesday, December 3, 2025 10:00 AM  
To: Bruvry, Andre; Crystal-Marie Dyer  
Cc: Neely, Thomas; Mark Hayes; DaPolito, Kate  
Subject: Re: UPRR - PURCHASE ORDER:- Trentwood, Wa - Aluminum Dross II - Cost estimate change request

Andre, Yes it is the exact same stuff from the same site.



**Tyson Hurst**  
General Manager  
Spokane, WA  
(509) 601-0655  
**24/7 Emergency Response**  
**(866) GRAYMAR I (866) 472-9627**  
**[www.graymarenv.com](http://www.graymarenv.com)**



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From: Bruvry, Andre <Andre.Bruvry@wsp.com>  
Sent: Wednesday, December 3, 2025 9:58 AM  
To: Tyson Hurst <thurst@graymarenv.com>; Crystal-Marie Dyer <cdyer@graymarenv.com>  
Cc: Neely, Thomas <Thomas.Neely@wsp.com>; Mark Hayes <mhayes@graymarenv.com>; DaPolito, Kate <kate.dapolito@wsp.com>  
Subject: RE: UPRR - PURCHASE ORDER:- Trentwood, Wa - Aluminum Dross II - Cost estimate change request

**CAUTION:** This email originated from outside of the company. Do not click links or open attachments unless you recognize the sender and know the content is safe. If an email link prompts you to log into your O365 email to view it, *do not do so*. If in doubt, contact and confirm the email with the sender via phone, or reach out to IT (215-701-5598).

Hi Tyson,

Being that we discussed 7 CY import of the:

<b>Plant</b>	120_01138-Hayford AGG
<b>Product</b>	2304 - 1 1/4" - 1/4" Chip
<b>Specification</b>	9-03.9(2) Permeable Ballast
<b>Period</b>	11/11/2021 - 11/11/2022

From

Owner: Spokane Raceway Park, Inc.	Aggregate Source: PS-C-308
Lessee: Inland Asphalt Co.	Known as: Hayford Road Pit
Located in: SW1/4 SW1/4 Section 13 T25N R41E	County: Spokane

I'd like to clear the import with an approval from the Dept. of Ecology before we bring it onsite.

**APPENDIX B**

**Post-Maintenance Photograph Log  
December 9, 2025**

**ACKNOWLEDGEMENT**

<b>Customer Name:</b>	Na	<b>Customer Title:</b>	Na
<b>Customer Signature:</b>	<i>NA</i>	<b>Date:</b>	12/09/2025
<b>GrayMar Representative:</b>	W Scott	<b>GrayMar Title:</b>	Eo
<b>GrayMar Signature:</b>	<i>[Signature]</i>	<b>Date:</b>	12/09/2025

