STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
4601 N Monroe Street • Spokane, WA 99205-1295 • 509-329-3400

January 27, 2022

Austin Stewart
Spokane County Water Resources
1026 West Broadway Ave
Spokane, WA 99260

Re: No Further Action at the following Site:

Site Name: Spokane County Motorsport Park
Site Address: 11900 Block W Sprague Rd, Airway Heights
Cleanup Site ID: 1479
Facility/Site ID: 7114346
VCP Project ID: EA0197

Dear Austin Stewart:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Spokane County Motorsport Park facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided as follows.

Description of the Site

This opinion applies to the only Site described as follows. The Site is defined by the nature and extent of contamination associated with the following releases:

- Petroleum hydrocarbons into the soil.

- Trichloroethylene (TCE) and volatile organic compounds (VOCs) into the groundwater

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the Opinion

Ecology bases this opinion on information in the documents listed in **Enclosure B**. You can request these documents by filing a records request.[1] For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check whether the documents are available on the Site webpage[2].

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. **Characterization of the Site.**

   Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A.**

   Soil samples collected from the ground surface, test pits, and soil borings identified localized areas of shallow oil-range petroleum hydrocarbon contamination. Groundwater in the shallow Wanapum Basalt aquifer at approximately 20 feet below ground surface (bgs) was not impacted by the shallow soil contamination.

   Onsite supply wells and monitoring wells drilled into the deeper Grand Ronde Basalt aquifer at approximately 360 feet bgs contained TCE and other volatile organic compounds (VOCs) exceeding the MTCA Method A cleanup levels. The lack of shallow soil and groundwater contamination indicates that the contaminant plume originated offsite and migrated to the Site through groundwater flow in the deeper aquifer. Groundwater flow was originally characterized as trending north to south, but the most recent evaluation indicates flow trends west to east parallel to regional groundwater flow through the Airway

[1] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[2] https://apps.ecology.wa.gov/gsp/CleanupSiteDocuments.aspx?csid=1479

Heights paleochannel. The western and eastern extents of the TCE plume remained undefined throughout the monitoring phase while the northern and southern extents were defined by monitoring wells MW-6 and MW-7.

2. **Establishment of cleanup standards.**

   Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

   For soil, the cleanup levels were established using MTCA Method A and are based on protection of groundwater. The land use is classified as unrestricted. The point of compliance for soils is throughout the lateral and vertical extent of the Site. This is the standard point of compliance. The cleanup levels are as follows.

Contaminant	**Cleanup Level (mg/kg)**
Heavy oil-range petroleum hydrocarbons	2000

   For groundwater, the cleanup levels were established using MTCA Methods A and B and are based on the protection of drinking water. For groundwater, the point of compliance is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site. This is the standard point of compliance. The cleanup levels are as follows:

Contaminant	**Cleanup Level (µg/L)**
Carbon tetrachloride	0.63
Ethylene dibromide (EDB)	0.01
Ethylene dichloride (EDC)	5
Methylene chloride	5
Trichloroethene (TCE)	4
Vinyl chloride (VC)	0.2

3. **Selection of cleanup action.**

   Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

   - Excavate and dispose of all contaminated soils at the surface and throughout the upper sedimentary unit.
   - Install monitoring wells within both the shallow and deep aquifers.

- Monitor groundwater on a quarterly basis until samples from all wells are below the applicable cleanup levels for a minimum of four consecutive quarters.
- Evaluate regional geologic and environmental data to assess the likely source of the deep aquifer contamination and the risk of continued impacts.

4. **Cleanup.**

   Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

   - In 2007, all potential sources of surficial soil contamination were removed along with impacted surface soil. In 2010, approximately 14 tons of soil were excavated and disposed offsite.
   - In 2009, three monitoring wells (MW1-S through MW3-S) were installed in the shallow aquifer at approximately 20 feet bgs. Results from these wells were below cleanup levels for all contaminants of concern. In 2011 and 2012, four monitoring wells (MW-4 through MW-7) were installed in the deeper aquifer at approximately 360 feet bgs. Both MW-4 and MW-5 contained TCE above the MTCA cleanup level.
   - Groundwater was monitored quarterly from 2012 through 2015 and from 2017 to 2020, until the sample results from all wells were below MTCA cleanup levels for all contaminants of concern for a minimum of six consecutive sampling events.
   - A regional groundwater and environmental review conducted in 2021 identified several potential TCE sources within the area, proposed a new mechanism of hydraulic transport through the Airway Heights paleochannel, and re-evaluated the groundwater flow regime. The study also determined the risk of continued groundwater impacts in the region to be low.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

- Hazardous Sites List.
- Confirmed and Suspected Contaminated Sites List.

That process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

Limitations of the Opinion

1. **Opinion does not settle liability with the state.**

   Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion does not:

   - Resolve or alter a person's liability to the state
   - Protect liable persons from contribution claims by third parties.

   To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).

2. **Opinion does not constitute a determination of substantial equivalence.**

   To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you proposed will be substantially equivalent. Courts make that determination. *See* RCW 70A.305.080 and WAC 173-340-545.

3. **Opinion is limited to proposed cleanup.**

   This letter does not provide an opinion on whether further remedial action will actually be necessary at the Site upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the Voluntary Cleanup Program (VCP).

4. **State is immune from liability.**

   The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70A.305.180.

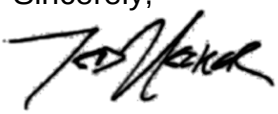
Contact Information

Thank you for choosing to clean up the Site under the VCP. As you conduct your cleanup, please do not hesitate to request additional services. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our webpage [3]. If you have any questions about this opinion, please contact me by phone at 509-342-5564 or e-mail at ted.uecker@ecy.wa.gov.

[3] https://www.ecy.wa.gov/vcp

Sincerely,



Ted M. Uecker
ERO Toxics Cleanup Program

tmu:hg

Enclosures (1): A – Site Description and Diagrams
B – List of Site Documents

cc: Debra Geiger, Spokane County
Kathleen Falconer, Ecology KLF

Enclosure A

Description and Diagrams of the Site

Site Description

The Site is located at 705 North Hayford Road in Airway Heights, Spokane County parcel 15135.0025. The Site encompasses approximately 577 acres of land. Construction began for the raceway park in 1973 and the first race on the completed race track was held in May 1974. Prior to development, the property was unimproved agricultural or range land. The Site is generally surrounded by unimproved land to the north and west. A gravel pit is located along the southwest property boundary. Northern Quest Casino is located east of the southeast property boundary. W Northern Quest Drive/ W Sprague Avenue borders the Site to the south; Geiger Correctional Facility is located south of Sprague Avenue.

The Site includes two racetracks, a road course and an oval course, and a drag strip. Various racing events were held from 1974 through August 2007. Spokane County purchased the property in 2008, and the Kalispel Tribe purchased the property from the county in 2021.Current property improvements include various buildings primarily associated with the track operations, including grandstands, concessions, restrooms, storage buildings, and track offices.

The Site is located within the boundaries of the Columbia Plateau Regional Aquifer System in the West Plains area. Site soils consist of sands and gravels. Site geology consists of unconsolidated glacial outburst flood sediments from 12 to 36 feet below ground surface (bgs), overlaying the Wanapum Basalt Formation from 36 to approximately 130 feet bgs. These units are followed by the lower permeability Upper Latah Formation from 173 to 210 feet bgs, and the Grand Ronde Basalt Formation from 210 to 360 feet bgs. The Lower Latah Formation below the Grand Ronde provides an aquitard for the lower aquifer, and older sedimentary and metamorphic bedrock underlies the region. The southwest to northeast trending Airway Heights paleochannel is incised into the Wanapum Basalt and infilled by the glacial flood sediments, providing a localized pathway for groundwater flow. A shallow groundwater zone occurs in the upper sediments and fractured upper basalt formation at 15 – 19 feet below ground surface (bgs). Shallow groundwater reportedly flows to the west. A deeper aquifer occurs in the lower basalt formation at approximately 300 feet bgs. The inferred flow direction for the deep aquifer is to the north east.

Site History

A Phase I Environmental Site Assessment (ESA) was conducted in December 2007 to identify areas with environmental concerns and potential impacts to the property. The ESA identified several recognized environmental conditions (RECs) at the Site, including lead in soil from racing engine exhaust, piles of tires throughout the property,

and large amounts of abandoned and stored equipment, vehicles, and parts which may have contaminated underlying soils with metals. Several 55-gallon drums were noted on the site, including one empty drum that was labeled as racing fuel with tetraethyl lead. One 200-gallon above ground gasoline tank was identified in the shop. Oil stained soils were noted in several areas.

Since the completion of the Phase I ESA, surface cleanup was conducted in various areas for abandoned vehicles and trailers, vehicle parts, drums and containers, miscellaneous construction and demolition debris, and trash. A Feasibility Study was conducted in February 2008 for Spokane County, noting that no waste recovery/recycling areas were noted for automotive fluids and it was unknown how such materials were disposed.

In April 2008, groundwater samples were collected from two onsite supply wells (Well 1 and Well 2) installed in the deeper Grand Ronde Aquifer. The samples were analyzed for volatile organic compounds (VOCs), gasoline-, diesel-, and oil-range hydrocarbons, and benzene, toluene, ethylbenzene, xylenes (BTEX) and methyl tertiary butyl ether (MTBE). Trichloroethene (TCE) was detected in both samples collected from Well 1. Concentrations of TCE were 11.1 ug/l and 11.4 ug/l, exceeding the cleanup level of 5 ug/l. All other results were non-detect. Ecology conducted a Site Hazard Assessment in 2008 and the Site ranked a 2.

A site inspection was conducted by Ecology's Hazardous Waste and Toxics Reduction Program in July 2009. Used oil containers were observed on the north side of the auto shop, and a leaking drain value was observed on one of the containers. Open and cracked used oil containers were also observed on the west side of the auto shop.

A Phase II ESA was conducted in September 2009 to assess the presence of potential contamination at specific areas of concern at the Site, particularly areas of known present and/or historical use for vehicle maintenance and chemical storage. Ten test pits (TP-1 through TP-10) were excavated to a depth of four feet bgs. Two discrete soil samples were collected from each test pit at 0 to 1-foot and 3 to 4-foot depths bgs. Shallow soil samples (0 to 0.5 feet bgs) were collected from the oval track area, the northwest corner of the Well 2 enclosure, the southwest area of the drag strip, and the east-central portion of the pit area. Soil samples were collected from an abandoned monitoring well borings located adjacent to Drywell No. 1, northeast of the garage foundation. Samples were collected at depths of 16 and 21 feet bgs. Soil samples were analyzed for gasoline-, diesel-, and heavy oil-range organics (GRO, DRO, and HRO), BTEX, VOCs, and total metals (arsenic, cadmium, chromium, lead and mercury). Six soil samples were also analyzed for polycyclic aromatic hydrocarbons (PAHs). Shallow samples contained heavy oil-range organics exceeding cleanup levels.

Samples were collected from Well 1 and Well 2 in September and October 2009, and

from Well 1 in March 2010, as well as samples from onsite water taps. Samples were analyzed for VOCs and results were non-detect except for toluene in Well 1 which was below the cleanup level. Dibromochloromethane (EDB) and bromodichloromethane (EDC) were detected at concentrations exceeding the Method B cleanup level in the tap sample collected from the concession men's room.

In September 2009, three shallow groundwater monitoring wells (MW1-S through MW3-S) were installed to a depth of approximately 20 feet bgs in the upper aquifer. All groundwater sample results were non-detect. Groundwater samples were collected from the three monitoring wells in June and October 2010, and analyzed for VOCs, GRO, DRO, HRO, BTEX, MTBE, and metals (arsenic, cadmium, chromium, and lead). All results were below cleanup levels. The absence of TCE in soil samples and shallow groundwater indicated that the source of TCE was not a surface release but through migration of groundwater in the deeper aquifer from an upgradient source.

Additional soil was excavated from test pit TP-8 in October 2010. Approximately 14 tons of soil were excavated and transported to Graham Road landfill for disposal. Four confirmation soil samples were collected from the excavation and all results were non-detect or below cleanup levels.

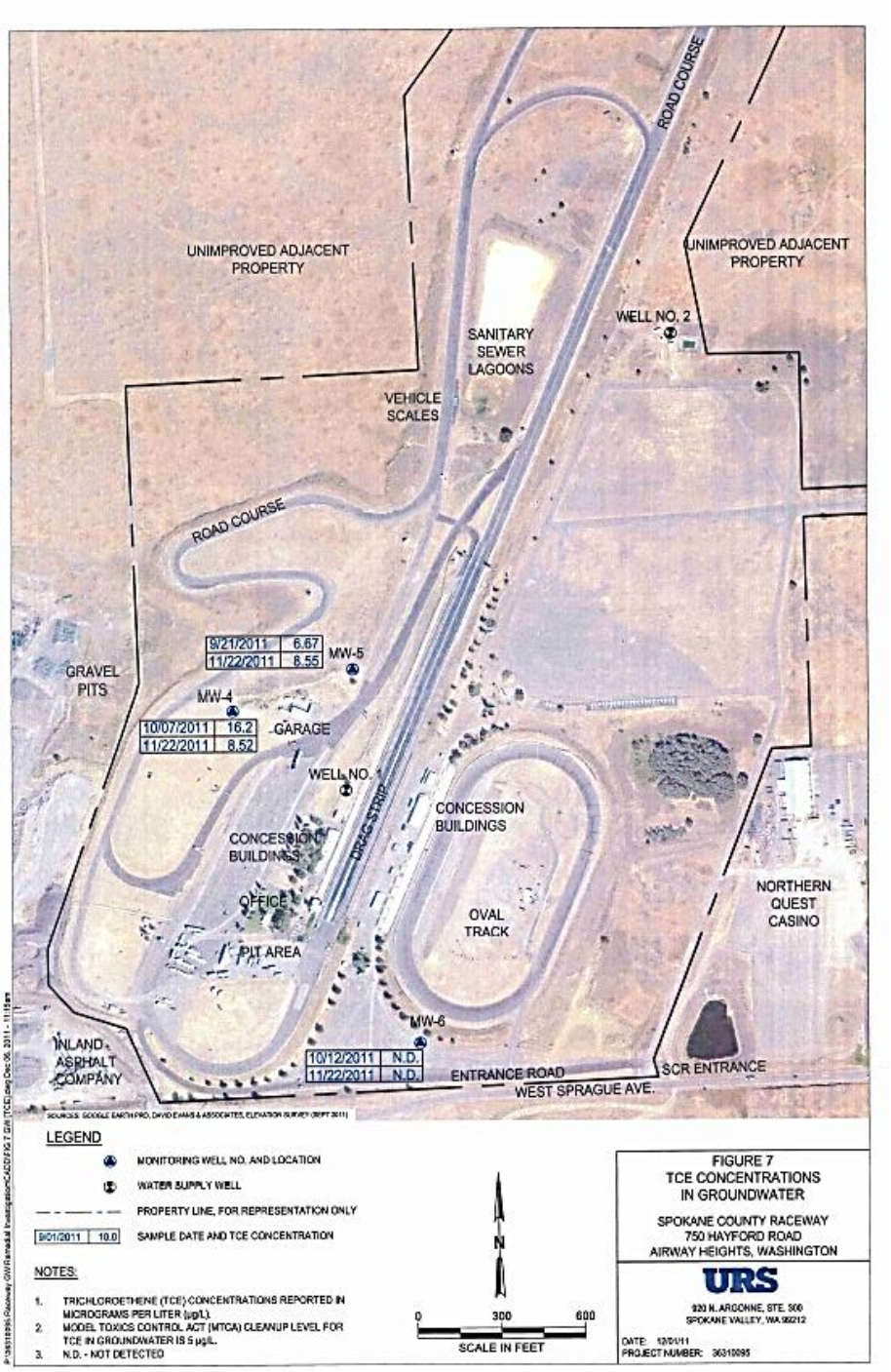
A Limited Phase II ESA was conducted in January 2011. Eighteen test pits (TP-1 through TP-18) were excavated in areas identified as needing further assessment. Test pits TP-1 through TP-15 were excavated to address the areas identified in Ecology's VCP Opinion letter; test pits TP-16 through TP-18 were excavated to address areas of drum or debris storage identified in the Phase I ESA. In general, the test pits were excavated to 4 feet bgs; however, test pits TP-4 and TP-14 were terminated at refusal on weathered basalt at about 2 ½ and 3 feet, respectively. Groundwater was encountered in TP-14 at 2 feet bgs and at 4 feet in TP-16. Soil samples collected from each test pit at various depths were field screened. Stained soils were not observed in any samples; headspace vapors were not detected in any samples. One soil sample was collected from the bottom of each test pit. All results were non-detect or below cleanup levels. Based on these results and previous assessments conducted at the Site, soil was determined to meet cleanup standards throughout the Site.

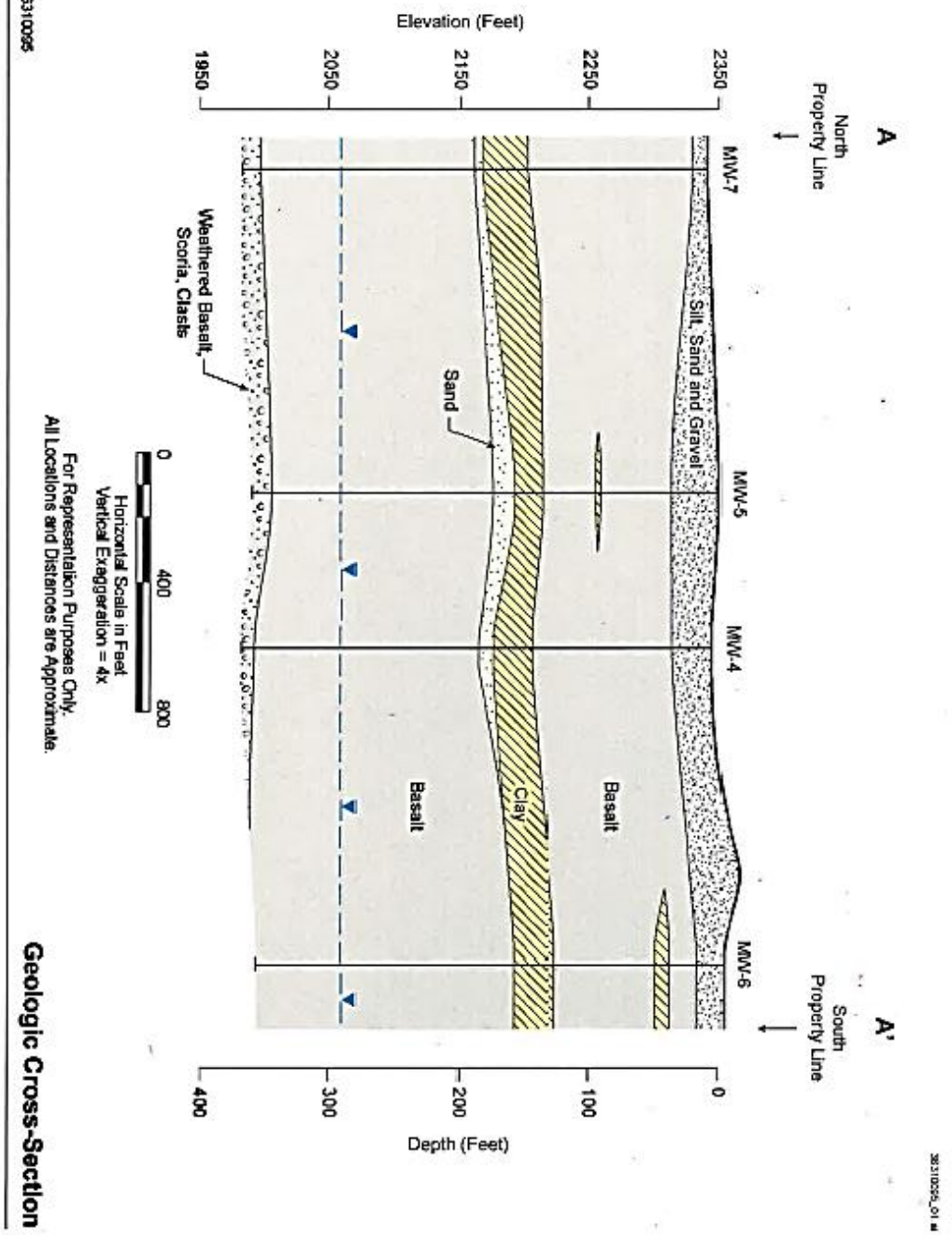
In July 2011, three additional monitoring wells (MW-4 through MW-6) were installed in the deeper aquifer at depths of approximately 360 feet. Groundwater measurements from the wells indicated flow to the south. Groundwater samples were collected September – November 2011 and were analyzed for TCE and other VOCs. Results indicated TCE above cleanup levels in MW-4 and MW-5. Well MW-7 was installed in September 2012 and was assumed to be the most upgradient well, but had repeatedly been non-detect for TCE.

Groundwater was monitored quarterly from 2012 through 2015 and resumed in 2017 to

demonstrate compliance with groundwater standards in preparation for site closure. Samples were analyzed for TCE, carbon tetrachloride, ethylene dibromide (EDB), methylene chloride (MC), and vinyl chloride (VC). The final sampling event in August 2020 demonstrated that TCE was below cleanup levels in all wells for a minimum of six quarterly sampling events.

Site Diagrams




A
A'
North Property Line
South Property Line
MW-7
MW-5
MW-4
MW-6
Elevation (Feet)
2350
2250
2150
2050
1950
Depth (Feet)
0
100
200
300
400
Silt, Sand and Gravel
Basalt
Clay
Sand
Basalt
Weathered Basalt, Scoria, Clasts
0
400
800
Horizontal Scale in Feet
Vertical Exaggeration = 4x
For Representation Purposes Only.
All Locations and Distances are Approximate.
Job No 36310055
Geologic Cross-Section

Enclosure B

List of Site Documents

1. Landau Associates, Inc., Spokane County Motorsport Park, Groundwater and TCE Contamination Evaluation, October 1, 2021.

2. Spokane County, Spokane County Motorsports Park Project Status Report, August 27, 2020.

3. Spokane County, Spokane County Motorsports Park Terrestrial Ecological Evaluation, August 25, 2020.

4. Spokane County, Spokane County Motorsports Park Project Status Report, June 16, 2020.

5. Spokane County, Spokane Raceway Park VCP Progress Report-November 2019, January 6, 2020.

6. Spokane County, Spokane County Motorsports Park Project Status Report, September 27, 2019.

7. Spokane County, Spokane County Motorsports Park Project Status Report, June 21, 2019.

8. Spokane County, Spokane County Motorsports Park Project Supplementary Report, November 19, 2018.

9. Spokane County, Spokane County Motorsports Park Project Status Report, October 10, 2018.

10. Spokane County, Spokane County Motorsports Park Project Status Report, July 10, 2017.

11. Spokane County, Spokane County Motorsports Park Project Status Report, October 18, 2012.

12. URS, Groundwater Investigation for Trichloroethene, Spokane Raceway Park, December 10, 2011.

13. GeoEngineers, Limited Phase II Environmental Site Assessment, Spokane County Raceway, March 29, 2011.

14. GeoEngineers, Environmental Activities Status Report, Spokane Raceway, March 3, 2011.

15. LFR, Inc., Phase II Environmental Site Assessment, Spokane County Raceway, January 22, 2010.

16. Baskervill Motorsports Design, Spokane Raceway Park Feasibility Study, February 8, 2008.

17. USKH, Phase I Environmental Site Assessment, Spokane Raceway Park, December 21, 2007.