

29 March 2019

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

Subject: Cap Integrity Monitoring

BNSF Railway Company, Parkwater Rail Yard

Spokane, Washington

KJ 1896110.00

Dear Ms. Treccani:

This letter provides the results of the June 2018 cap integrity monitoring at the BNSF Railway Company (BNSF) Parkwater Rail Yard (Site) located at 5302 East Trent Avenue in Spokane, Washington. The Site is in the cleanup process under the Model Toxics Control Act (MTCA) through the Washington State Department of Ecology (Ecology). The cleanup is being implemented by BNSF under Consent Decree No. 12202548-1, dated 19 July 2012.

An Engineering Design Report (EDR)¹ dated 6 March 2013 was prepared to detail the design of the selected cleanup action. EDR soil cleanup activities were implemented between 2013 and 2015. A Final Soil Cleanup Action Report dated 6 February 2017 was submitted to Ecology to document the construction activities, including soil excavation, soil disposal/management, waste characterization sampling, verification sampling, site restoration, and capping. According to the EDR, the gravel caps from the soil remediation activities (East and West Debris Areas and the Former Koch Asphalt Area) need to be monitored on an annual basis for the first 5 years and every 2 years thereafter.

Cap integrity monitoring included walking the perimeters and surfaces of the capped areas and inspecting for damage, degradation, or vandalism; puddles or other depressions; and animal burrows. Based on the field activities performed on 28 June 2018, the following conditions were noted:

- For the East and West Debris Area:
 - No indications of settlement or erosion of the cap were observed.
 - No indications of damage, degradation, or vandalism of the cap were observed.
 - No puddles or other depressions were observed.
 - Limited vegetation was noted on the cap.
 - The perimeter fencing was observed to be in good condition apart from minor damage to the cable on the southwestern corner of the fence, which was repaired on 28 June 2018.

¹ GeoEngineers. 2013. Engineering Design Report, BNSF Parkwater Rail Yard Site, Spokane, Washington.

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- For the Former Koch Asphalt Area:
 - No indications of settlement or erosion of the cap were observed.
 - No indications of vandalism of the cap were observed.
 - No puddles or other depressions were observed on the cap.
 - No vegetation was noted on the cap.
 - BNSF is utilizing the area to store equipment/trailers as intended. Shallow tire tracks were observed, but are expected.

Site photograph logs from the field inspection for the East and West Debris Area and the Former Koch Asphalt Area have been included as Attachments A and B, respectively.

Please contact us at (253) 835-6400 if you have questions or concerns about the cap integrity monitoring.

Very truly yours,

Kennedy/Jenks Consultants, Inc.

51880 3 24 P

Diane Tackett Project Manager Ryan Hultgren Project Engineer

cc: Shane DeGross, BNSF Railway Company

Attachments:

Attachment A – Site Photographs, East and West Debris Area Attachment B – Site Photographs, Former Koch Asphalt Lease Area



Site Photographs, East and West Debris Area

SITE PHOTOGRAPHS



Photograph 1 – Looking to west. 6/28/2018



Photograph 2 – Looking to south. 6/28/2018

SITE PHOTOGRAPHS



Photograph 3 – Looking to southeast. 6/28/2018



Photograph 4 – Looking to east. 6/28/2018

SITE PHOTOGRAPHS



Photograph 5 – damage to southwestern fence corner. 6/28/2018



Photograph 6 – damage to southwestern fence corner. 6/28/2018

SITE PHOTOGRAPHS



Photograph 7 – fence repair. 6/28/2018



Site Photographs, Former Koch Asphalt Lease Area

SITE PHOTOGRAPHS

Former Koch Asphalt Lease Area 2018 Cap Integrity Monitoring Parkwater Rail Yard Site



Photograph 1 – Looking to west. 6/28/2018



Photograph 2 – Looking to north. 6/28/2018

SITE PHOTOGRAPHS

Former Koch Asphalt Lease Area 2018 Cap Integrity Monitoring Parkwater Rail Yard Site



Photograph 3 – Looking to east. 6/28/2018



Photograph 4 – Looking to southwest. 6/28/2018