Kennedy Jenks

14 August 2020

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 2096110*00

Dear Ms. Treccani:

This letter provides the results of the June 2020 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.

The June 2020 cap inspection is the fifth annual cap inspection performed since soil cleanup activities were completed in 2015. In accordance with the EDR, BNSF will reduce the cap inspection frequency to biennial (once every 2 years), with the first biennial event occurring in summer 2022.

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 17 June 2020, 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.
  - Scattered weeds were noted growing on the cap, but were not sufficient to warrant removal.

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

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  - The perimeter fencing was observed to be in good condition apart from damage to the cable on the southwestern corner of the fence. Cap integrity in the southwestern corner has not been affected by the fence cable damage.
  - A small storage shed was observed in the center of the cap.

- 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.

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 (503) 423-4018 if you have questions or concerns about the cap integrity monitoring.

Very truly yours,

Kennedy/Jenks Consultants, Inc.

8/14/2020

Alice Robinson
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

Attachment A

Site Photographs, East and West Debris Area

***Photo #1**:* Looking to the southwest.

***Photo #2**:* Looking to the northeast.

***Photo #3**:* Damage to southwestern fence corner.

***Photo #4**:* Looking to the southwest.

***Photo #5**:* Looking to the northeast.

Attachment B

Site Photographs, Former Koch Asphalt Lease Area

***Photo #1**:* Looking to the north.

***Photo #2**:* Looking to the northwest.

***Photo #3**:* Looking to the west.

***Photo #4**:* Looking to the southwest.