

14 May 2024

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 2496110*00

Dear Ms. Treccani:

This letter provides the results of the 4 April 2024 cap integrity monitoring at the BNSF Railway Company (BNSF) Parkwater Rail Yard (Site) located at 5302 East Trent Avenue in Spokane, Washington. The Site cleanup process was conducted under the Model Toxics Control Act (MTCA) through the Washington State Department of Ecology (Ecology) and was implemented by BNSF under Consent Decree No. 12202548-1 (Decree), dated 19 July 2012. On 24 August 2022 Ecology provided written notification that the remediation actions required by the Decree had been satisfactorily completed and that no further remedial action is necessary to clean up contamination at the Site under MTCA. The notification also stated that Ecology had decided to dismiss the Decree and that the The Attorney General's Office will seek joint dismissal of the Decree in Spokane County Superior Court.

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 Area, Figure 1) need to be monitored on an annual basis for the first 5 years and every 2 years thereafter.

The 4 April 2024 cap inspection is the seventh cap inspection performed since soil cleanup activities were completed in 2015. In accordance with the EDR, BNSF reduced the cap inspection frequency to biennial (once every 2 years) in 2020, with this being the second biennial event.

Cap integrity monitoring was conducted by Spokane Environmental Solutions (SES) and 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 4 April 2024, the following conditions were noted:

- For the East and West Debris Area:
 - No indications of settlement or erosion of the cap were observed.

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

- 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.
 - The perimeter fencing was observed to be in good condition.
- For the Former Koch 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.

Based on the observations, the caps are in good condition and not maintenance or repair work is needed at this time. Site photograph logs from the field inspection for the East and West Debris Area and the Former Koch Asphalt Area have been included as Attachment A. Capped area locations are shown on Figure 1.

The next cap integrity monitoring event is scheduled for 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.



Shaelyn Thomas
Project Manager

cc: Shane DeGross, BNSF Railway Company

Figures:

Figure 1 – BNSF Parkwater Railyard Site Map

Attachments:

Attachment A – Site Photographs

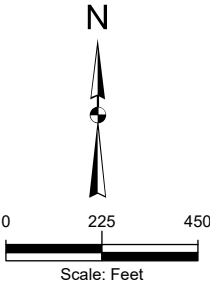
Figure



Legend

- Capped Areas
- Property Boundary

Notes:
1. All locations are approximate.



KJ Kennedy Jenks

Parkwater Railyard
Spokane, Washington

**BNSF Parkwater Railyard
Site Map**

2496110*00
Figure 1

Attachment A

Site Photographs

Parkwater CAP Inspection

PROJECT IMAGE DOCUMENTATION

April 4, 2024







Former Koch Area Gravel Cap

