

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

Feb 12, 2018

Ms. Cindy Kinzer, P.E. Senior Design Engineer City of Spokane 808 W Spokane Falls Blvd Spokane, WA 99201

Re: Subsurface Work at the Hamilton Street Bridge Site in Conjunction with the Phase 2B Martin Luther King Jr. Drive and Ben Burr Trail Construction

Dear Ms. Kinzer:

On January 18, 2018 representatives from the City of Spokane met with representatives from the Washington Department of Ecology (Ecology) Toxics Cleanup Program and Landau Associates, to discuss proposed work associated with the City of Spokane's Phase 2B Martin Luther King (MLK) Jr. Drive and Ben Burr Trail construction. Work associated with the MLK Jr. Drive Phase 2B and the Ben Burr trail will take place partially on the Hamilton Street Bridge Site, Cleanup Site ID No. 3509 (Site), located at 111 North Erie Street on the southern bank of the Spokane River in Spokane, Washington.

The Site soils are impacted with semi-volatile organic compounds (SVOCs), polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), and inorganic compounds. In 2005 a remedial action was implemented at the Site, which consisted of the placement of a soil cap over the exposed contaminated soils, and directing storm water away from known areas of contamination. In addition, the river embankment was stabilized so that erosion or flooding does not cut back into contaminated soil.

Discussions at the January 18, 2018 meeting focused on the existing remedy currently in place, and the suitability of the proposed work with regard to the existing remedy.

The purpose of this letter is to concur with the City of Spokane's proposal as discussed during the January 18, 2018 meeting and as it relates to the existing remedy and covenant at the Site. As proposed, Ecology is of the opinion that the work associated with the Extension Phase 2B will maintain the integrity of the soil cap, will ensure storm water will not collect in known areas of contamination, adversely affect the access and utility of current on-Site groundwater monitoring wells, and is in general agreement with the environmental covenant for the Site.

1. Ecology's concurrence of the MLK stormwater plans and the Ben Burr trail alignment is based upon the preliminary drawings of the Phase 2B that are showing the MLK Jr. Drive stormwater conveyance structures and the planned alignment of the Ben Burr trail. The drawings are dated January, 2018, sealed by Cindy Kinzer, P.E. and enclosed with this letter.





- 2. The storm basin delineations, stormwater facility location, type and sizes and the Ben Burr trail alignment were identified in these preliminary drawings. It is also Ecology's understanding than no subsurface work is associated the construction of the Ben Burr trail. Hence, if any Phase 2B subsurface work or the Riverside trail alignment deviate from the attached drawings within the Site footprint, as well as any other groundwater monitoring wells are to be modified, the City will inform Ecology of any changes or deviations within one week. Additionally, the City will notify Ecology of any planned modifications of other groundwater monitoring wells, beyond those wells identified in the attached drawings, before any well modifications are performed.
- 3. The Plans and project specifications address worker safety and handling of material excavated from the "contamination zones" within the Hamilton Street Bridge site. The Contractor is required to provide a Health and Safety Plan (HASP) to address worker and public safety. The HASP will be forwarded to Ecology prior to the start of construction.
- 4. The existing contaminated soils are encapsulated with 2 feet of fill. Any excavation that reaches the contaminated fill zones will receive special care and handling. All excavated soils must be handled and disposed of in accordance with all applicable Federal, State and local regulations governing disposal of hazardous and non-hazardous wastes. It is not anticipated that groundwater should be encountered during the Phase 2B construction work. Note however, should groundwater be encountered within the contaminated soil zones during Phase 2B work, the groundwater will require special care and handling. Contaminated groundwater must be handled in accordance with all applicable Federal, State and local regulations governing disposal of hazardous and non-hazardous wastes.
- 5. If contaminated soils and groundwater are encountered outside the Site footprint as shown in the attached drawing, the City must contact Ecology within a maximum of 90 days from discovery. However, to expedite the construction of Phase 2B as smoothly as possibly, Ecology recommends that any discovery of contaminated soils and groundwater outside the Site footprint be reported to Ecology as soon as possible.
- 6. All excavations requiring backfilling with imported fill within the Site will be over-excavated and backfilled with clean fill material consisting of a naturally-occurring or crushed sand and gravel mixture meeting the general requirements for "ballast," as defined in the WSDOT Standard Specifications [Section 9-03.9(1)].
- 7. The City must provide Ecology with a report summarizing all materials disposed of from the Site with field observations, chemical analysis, final disposition of the waste, and waste manifests from excavations performed within the Site footprint as shown in the attached MLK Drive Phase 2B storm conveyance system drawings. The report shall also include a description and certification of any fill material brought into the site showing the origin and that the fill conform to the requirements set forth in item No. 7 above.
- 8. A stormwater pollution prevention plan should be in place for this project. Erosion and sediment control devices and BMP's must be in place to address excavation/re-encapsulation activities within any contaminated soil zones that may be affected by the planned construction work during Phase 2B.
- 9. The City will forward Ecology a set of final construction plans (pdf) when they become available.
- 10. The City will send Ecology an invite to the pre-construction meeting and notify the Dept. when construction is scheduled to start.

- 11. The project specifications provide the Contractor with Landau's contact number to coordinate well monitoring schedules.
- 12. Five of the monitoring wells need to be adjusted with this project. The standard monitoring well detail sheets and covers must be a part of the Contract bid documents. A copy of the specifications and details were presented at the meeting and found acceptable. Modifications to the groundwater monitoring wells must be performed by a State of Washington licensed well drilling contractor. The affected wells are identified in the attached Site drawing.
- 13. The top of casing of the new well head will be surveyed to specifications set forth by Landau Associates, please contact Landau prior to the surveying work is performed.
- 14. All groundwater monitoring well locations must be accessible to van- or pickup-sized vehicles upon completion of the construction project.
- 15. Site access must be controlled upon completion of the Phase 2B construction project, to prevent unauthorized vehicular access to the Site or illegal dumping of materials.

If you have any questions, please contact me at (509) 329-3543 or via email at clof461@ecy.wa.gov.

Sincerely,

Christer Loftenius

Project Hydrogeologist, L.G. L.H.G. Dept. of Ecology, Eastern Region

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CL/cka

Attachments: Phase 2B MLK Jr. Drive, preliminary stormwater conveyance system and Ben Burr trail

alignment, dated Jan 2018

cc: Bryce Robbert, Avista Corporation

Ryan Reich, Landau Associates Dept. of Ecology project file





