



## **Periodic Review**

Northport City Park  
Facility Site ID#: 3833228  
Cleanup Site ID#: 3421

Park Road  
Northport, Washington 99157

Prepared by the  
Washington State Department of Ecology  
Toxics Cleanup Program  
Eastern Regional Office

December 2019

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## 1.0 INTRODUCTION

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup site conditions and monitoring data to ensure that human health and the environment are being protected at the Northport City Park site (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

Cleanup activities at this Site were completed through the Voluntary Cleanup Program (VCP) under VCP No. EA0232. Following all cleanup actions, residual concentrations of arsenic and lead remain in soil that exceed MTCA Method A cleanup levels established under WAC 173-340-740(2). As a result of residual contamination, institutional controls were required for the Site to be eligible for a no further action (NFA) determination. WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a site every five years under the following conditions:

1. Whenever the department conducts a cleanup action
2. Whenever the department approves a cleanup action under an order, agreed order or consent decree
3. Or, as resources permit, whenever the department issues a no further action opinion;
4. And one of the following conditions exists;
  1. Institutional controls or financial assurance are required as part of the cleanup
  2. Where the cleanup level is based on a practical quantitation limit
  3. Where, in the department's judgment, modifications to the default equations or assumptions using site-specific information would significantly increase the concentration of hazardous substances remaining at the site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

When conducting a periodic review and evaluating whether human health and the environment are being protected, the factors the department shall consider include [WAC 173-340-420(4)]:

- (a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site;
- (b) New scientific information for individual hazardous substances of mixtures present at the site;
- (c) New applicable state and federal laws for hazardous substances present at the site;
- (d) Current and projected site use;
- (e) Availability and practicability of higher preference technologies; and
- (f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

The department shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

## **2.0 SITE SUMMARY**

### **2.1 Site History**

The Site is located adjacent to the former LeRoi Smelter site in Northport, Washington. Northport covers approximately 372 acres, and is located along the east bank of Franklin D. Roosevelt Lake (Lake Roosevelt) on the upper Columbia River. Northport is approximately 7 miles south of the Canadian border and 35 miles north of Colville, Washington. A vicinity map is available as Appendix 6.1, and a Site plan is available as Appendix 6.2.

Beginning in 1897, the LeRoi Smelter refined copper, lead, and silver ores. At the peak of operation, the smelter processed 500 tons of ore per day. The smelter closed in 1909 due to opening of the smelter located in Trail, British Columbia. During World War I, the government demand for lead allowed the smelter to reopen. The facility closed again in 1921 due to low demand and was dismantled in 1922. Between 1922 and 1953, a private landowner purchased the Site and from 1953 through 2001, the western portion of the property was used as a lumber mill.

Operations contaminated properties outside of the Site, including residential and commercial properties and the adjacent City Park. BNSF Railway owns the park, which is leased to the City of Northport. BNSF owns a right-of-way that extends from 100 feet to about 180 feet south of the existing main line tracks. This right-of-way was occupied by the former smelter operations. Soil at and near the smelter is contaminated with lead, arsenic, and other metals.

At the peak of operation, the LeRoi Smelter processed 500 tons of ore per day; operations were suspended in 1909. In 1914, the LeRoi Smelter reopened to process lead ore from Leadpoint, Washington, to meet government demand during World War I. Lead smelting operations during this period produced up to 30 tons per day of airborne sulfur emissions. Operations ceased permanently in 1921, and the smelter site remained inactive until 1953. The furnace, roaster, crusher, and ore buildings were removed during this period of inactivity.

From 1953 to 2001, the entire smelter site was used as a lumber mill; the main lumber operations were located in the western portion of the property, and the eastern portion of the property was used to store lumber products and old metal parts. The lumber mill processed mostly cedar wood from rough-dimension lumber into exterior siding and exterior paneling. Mill processes included cutting, drying, and shipping the wood products. Mill operations were run on propane; no wood treatment or chemical use was reported during the mill's operating history.

### **2.2 Site Investigations**

From 1922 through 1998, several regulatory agencies conducted studies and investigations in Northport, including air quality assessments, a residential garden crop and soil study, blood level screening of Northport children, and soil sampling at the former smelter and Park. Between 2000 and 2003, the U.S. Environmental Protection Agency (EPA) conducted Preliminary Assessments/Site Investigations at 39 mine and mill sites, including the LeRoi Smelter site. In 2003, EPA conducted a Removal Site Evaluation of the LeRoi Smelter site and residential and

community properties in Northport. The 2003 EPA study included portions of the BNSF right-of-way south of the main tracks.

GeoEngineers conducted a subsurface evaluation for BNSF in April 2004; work included excavating 18 test pits and 24 hand auger borings. Soil samples were collected at approximate depths of 0.5, 1.0, and 1.5 feet below ground surface (bgs) from both the test pit and hand auger locations. In addition, soil samples were also collected from 3 and 6 feet bgs in the test pits. Samples were sieved in the field and screened for metals with a portable x-ray fluorescence (XRF) analyzer. A total of 162 samples were collected: 90 from test pits and 72 from borings. Based on XRF screening results, 56 soil samples were submitted for chemical analysis.

Twenty-nine of the 56 samples contained lead and/or arsenic above MTCA Method A cleanup levels. The 29 samples were collected from 16 test pits and five borings. Seventeen of the samples were from 0.5-foot depth, 5 from 1-foot depth, four from 1.5-foot depth, 3 from 3-foot depth, and none from 6-foot depth.

Assessment results indicated that the highest concentrations of lead and arsenic were in shallow samples collected throughout the gravel parking lot and in selected locations in the grass-covered portion of the Site, and in deeper samples in the west portion of the Site near the railroad tracks. Lead and arsenic concentrations exceeding cleanup levels were primarily limited to fill areas. The fill material was readily identified by its dark gray and black colors, as compared to brown native material. None of the soil samples collected from the native material contained lead or arsenic concentrations exceeding cleanup levels.

## **2.3 Remedial Actions**

Approximately 7,714 tons of lead- and arsenic-contaminated soil were excavated from the Site between September 9 and September 14, 2004. The maximum extent of excavation was approximately 2 feet bgs within the grass park area and about 4 feet bgs in the parking area. Contaminated soil was not removed from beneath existing buildings or trees, although hand excavation was conducted near trees to remove near-surface contaminated soil. Excavated soil was transported to the EPA containment area on the former LeRoi Smelter site.

Contaminated soil generally was not removed from the BNSF portion of the former smelter site, except to establish a uniform grade between the EPA site and the BNSF site. Material generated during slope development was transported to the EPA containment cell. Following slope development and site grading, the BNSF portion of the former smelter site was covered with an 8-mil thick plastic sheeting and capped with 12 inches of imported crushed rock.

The excavated area within the grass-covered portion of the Site was backfilled with top-soil, compacted, and covered with sod. About 1,452 cubic yards of top-soil was imported and about 29,000 square feet of sod was placed over the top-soil. The parking area was backfilled with about 6,500 tons of imported crushed rock.

A 4-foot tall chain link fence was installed in October 2004. The fence is located between the park and the railroad tracks to minimize the potential for pedestrian traffic across the tracks.

A few areas remain where residual arsenic and/or lead exceed Method A cleanup levels. These areas include soil immediately around trees that would be damaged by additional excavation, areas near the railroad tracks that could not be excavated without risking damage to the rails, and soil around three reported tunnels that passed through the park. Soil was excavated in the tunnel areas to a depth of approximately 4 feet bgs, but contaminated soil remained in these locations based on visual observations. The presence of low depression areas, which were interpreted to be the locations of former reported tunnels, were identified by deep buried ash and debris. These areas were not fully excavated due to the proximity to the railroad tracks and Lake Roosevelt.

## 2.4 Cleanup Levels

WAC 173-340-704 states that MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used.

MTCA Method A cleanup levels for unrestricted land use are appropriate for contaminants at the former LeRoi Smelter site. The cleanup actions conducted at the park Site were determined to be 'routine,' few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance.

At the time of the remedial action, the MTCA Method A cleanup level for lead and arsenic are 250 ppm and 20 ppm, respectively. Because soils with lead and arsenic concentrations exceeding MTCA Method A cleanup levels remain capped at the Site, institutional controls are required to prevent activities at the Site that might expose those soils.

For soil, the point of compliance is the area where the soil cleanup levels must be attained. Standard points of compliance are used for the Site. The standard point of compliance for soil is based on direct contact with contaminated soils, and is defined as the area throughout the Site to a depth of 15 feet.

## 2.5 Environmental Covenant

It was determined that institutional controls were required for the Site to be eligible for an NFA determination because soil with concentrations of lead and arsenic exceeding MTCA Method A cleanup levels was capped at the Site. Institutional controls in the form of an environmental covenant were recorded for the property in 2010, and an NFA was issued in 2014. The covenant imposes the following limitations:

1. Any activity that may result in the release or exposure to the environment of hazardous substances beneath the cap, create a new exposure pathway for hazardous substances beneath the cap, or impair or interfere with the integrity of the cap, is prohibited. Some examples of activities that are prohibited in the capped areas include the following: drilling, digging, excavating, placement of any objects or use of any equipment which deforms or stresses the

- surface beyond its load bearing capacity, piercing the surface with a rod, spike or similar item, bulldozing, or earthwork.
2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.
  3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.
  4. The Owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.
  5. The Owner must restrict leases to uses and activities consistent with the Covenant and notify all lessees of the restrictions on the use of the Property.
  6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Covenant. Ecology may approve any inconsistent use only after public notice and comment.
  7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, to determine compliance with this Covenant, and to inspect records that are related to the Remedial Action.
  8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.
  9. Neither Ecology nor the Owner intend to include any third party beneficiaries with enforcement rights under this Covenant.
  10. By signing this Covenant, the Owner does not intend to affect the scope of existing preemption under the Interstate Commerce Commission Termination Act, 49 U.S.C. § 100501.

The environmental covenant is available as Appendix 6.3.

## **3.0 PERIODIC REVIEW**

### **3.1 Effectiveness of Completed Cleanup Actions**

Based upon the Site visit conducted on August 21, 2019, the remedy appears to be functioning as intended. There is fencing around the perimeter of the park, and the grass and parking lot appear in good condition. The park appears to have regular use by the public. There were no indications that the soil cap had been compromised or other indications of exposure to contaminated soils capped at the Site.

The annual inspection report generated by AECOM for 2018 was available for review at the time of this review. The inspection report identified several deficiencies that had been addressed between 2016 and 2018, including:

- Missing fence panels
- Rodent burrows in the park
- Thinning grass in the park

None of these issues were apparent during the Site inspection conducted by Ecology in 2019, as they were successfully addressed by the City of Northport. Based on this evaluation, the City is meeting their obligation to maintain the capping remedy implemented for the Site.

A photo log is available as Appendix 6.4.

#### **3.1.1 Direct Contact**

Cleanup actions at the Site were intended to eliminate human exposure to contaminated soils at the Site. Exposure pathways to contaminated soils (ingestion, direct contact) were reduced by a barrier cap and institutional controls. Overall, the remedy at the Site protects human health and the environment from direct contact with contaminated soils.

#### **3.1.2 Institutional Controls**

Institutional controls were implemented in the form of an environmental covenant. The covenant helps to prevent the exposure of hazardous materials contained beneath the Site surface by prohibiting excavation, drilling, and any use of the property that is inconsistent with the covenant. The covenant remains active, and there is no evidence that any instruments have been recorded that limit the effectiveness or applicability of the covenant.

### **3.2 New Scientific Information for Individual Hazardous Substances for Mixtures Present at the Site**

There is no new pertinent scientific information for the contaminants related to the Site.



### **3.3 New Applicable State and Federal Laws for Hazardous Substances Present at the Site**

There are no new relevant or applicable state or federal laws for hazardous substances found at the Site.

### **3.4 Current and Projected Site Use**

The Site remains occupied by a public park and parking area. There have been no changes in current or projected future Site or resource uses.

### **3.5 Availability and Practicability of Higher Preference Technologies**

The remedy implemented included containment of hazardous substances and it continues to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

### **3.6 Availability of Improved Analytical Techniques to Evaluate Compliance with Cleanup Levels**

The analytical methods used at the time of the remedial action were capable of detection below MTCA Method A cleanup levels. The presence of improved analytical techniques would not impact decisions or recommendations made for the Site.

## **4.0 CONCLUSIONS**

- The cleanup actions completed at the Site appear to be protective of human health and the environment.
- Soil cleanup levels have not been met at the Site; however, the cleanup action for the property is determined to comply with cleanup standards under WAC 173-340-740(6)(f), since the long-term integrity of the containment system is ensured and the requirements for containment technologies have been met.
- The environmental covenant for the property is in place and will be effective in protecting public health and the environment from exposure to hazardous substances and protecting the integrity of the cleanup action.

Based on this periodic review, Ecology has determined that the requirements of the environmental covenant are being satisfactorily met. No additional remedial actions are required by the property owner. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the cap is maintained.

### **4.1 Next Review**

The next review for the Site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

## 5.0 REFERENCES

GeoEngineers. *Site Remediation Report*. October 28, 2005.

AECOM. *Annual Cap Maintenance Report – 2018*. November 7, 2018.

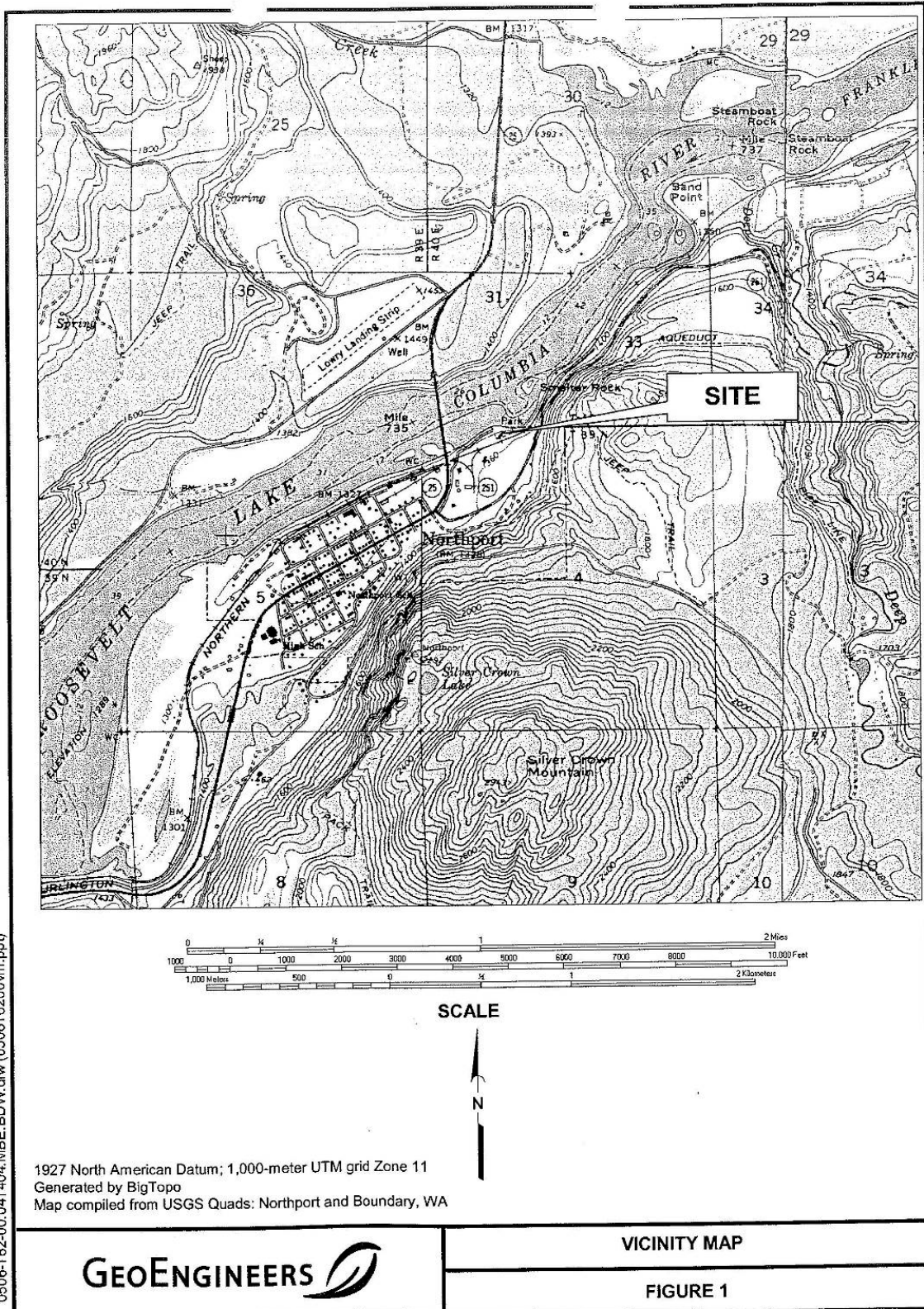
Ecology. *Environmental Covenant*. March 27, 2014.

Ecology. *NFA Determination Letter*. July 2, 2014.

Ecology. *Site Visit*. August 21, 2019.

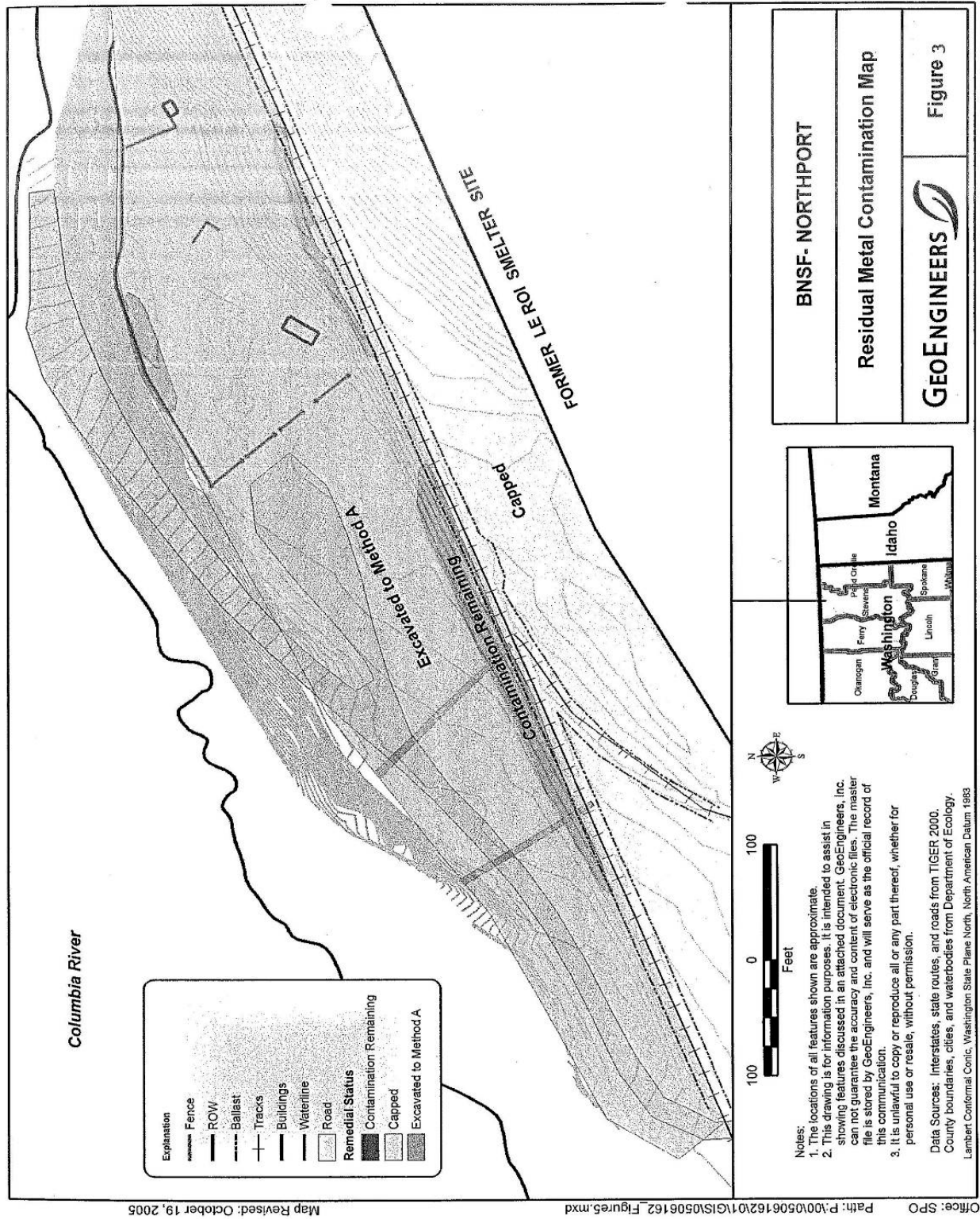
## **6.0 APPENDICES**

### 6.1 Vicinity Map



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## 6.2 Site Plan



### 6.3 Environmental Covenant

Auditor File #: 2014 0001818

Recorded at the request of:

K&L GATES

on 03/27/2014 at 10:45

Total of 7 page(s) Paid: \$ 78.00  
STEVENS COUNTY, WASHINGTON  
TIM GRAY, AUDITOR

AALLEN

### Environmental Covenant

After Recording Return to:  
Ms. Patti Carter  
Department of Ecology  
4601 N. Monroe Street  
Spokane, WA 99205

**Grantor:** BNSF Railway Company

**Grantee:** State of Washington, Department of Ecology

**Legal:** A parcel of land located within the Northeast ¼ of Section 4, Township 39 North, Range 40 East, W.M., Stevens County, Washington; more particularly described in Exhibit A.

**Tax Parcel Nos.:** 8002673

Grantor, BNSF Railway Company, hereby binds Grantor, its successors and assigns to the land use restrictions identified herein and grants such other rights under this environmental covenant (hereafter "Covenant") made this 23<sup>rd</sup> day of January, 2014 in favor of the State of Washington Department of Ecology (Ecology). Ecology shall have full right of enforcement of the rights conveyed under this Covenant pursuant to the Model Toxics Control Act, RCW 70.105D.030(1)(g) and WAC 173-340-440, and the Uniform Environmental Covenants Act, 2007 Wash. Laws ch. 104, sec. 12.

This Declaration of Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by BNSF Railway Company, its successors and assigns, and the State of Washington Department of Ecology, its successors and assigns (hereafter "Ecology").

To: Stevens County Recorder's Office

I am requesting an emergency nonstandard recording for an additional fee as provided in RCW 36.18.010. I understand that the recording processing requirements may cover up or otherwise obscure some part of the text of the original document.

Craig Inublood  
Signature of Requestor

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A remedial action (hereafter "Remedial Action") occurred at the property that is the subject of this Covenant. The Remedial Action conducted at the property is described in the following document: Site Remediation Report, BNSF – Northport Lead Site, Northport, WA (GeoEngineers, Inc., October 28, 2005).

This document is on file at Ecology's Eastern Regional Office.

This Covenant is required because the Remedial Action resulted in residual concentrations of lead and arsenic which exceed the Model Toxics Control Act Method A Cleanup Levels for SOIL established under WAC 173-340-740.

The undersigned, BNSF Railway Company, is the fee owner of real property (hereafter "Property") in the County of Stevens, State of Washington, that is subject to this Covenant. The Property is legally described in Attachment A.

BNSF Railway Company makes the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, as provided by law and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereafter "Owner").

Section 1. Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil that was contained as part of the Remedial Action, or create a new exposure pathway, is prohibited. Some examples of activities that are prohibited in the capped areas include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork.

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.



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STEVENS COUNTY, WASHINGTON

Section 4. The Owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 5. The Owner must restrict leases to uses and activities consistent with the Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, to determine compliance with this Covenant, and to inspect records that are related to the Remedial Action.

Section 8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

Section 9. Neither Ecology nor the Owner intend to include any third party beneficiaries with enforcement rights under this Covenant.

Section 10. By signing this Covenant, the Owner does not intend to affect the scope of existing preemption under the Interstate Commerce Commission Termination Act, 49 U.S.C. § 100501.

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STEVENS COUNTY, WASHINGTON

BNSF Railway Company

*Carrie Thompson*

**Carrie Thompson  
Manager- Land Revenue Management**

Dated: January 23<sup>rd</sup> 2014

STATE OF TEXAS

COUNTY OF TARRANT

On this 23<sup>rd</sup> day of January, 2014, I certify that Carrie Thompson personally appeared before me, acknowledged that she is the Manager- Land Revenue Management of the corporation that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that she was authorized to execute said instrument for said corporation.



*Cathy T. Benton*

Notary Public in and for the State of

CATHY T. BENTON

residing at

Weatherford, TX

My appointment expires Feb 17, 2015.

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STEVENS COUNTY, WASHINGTON

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

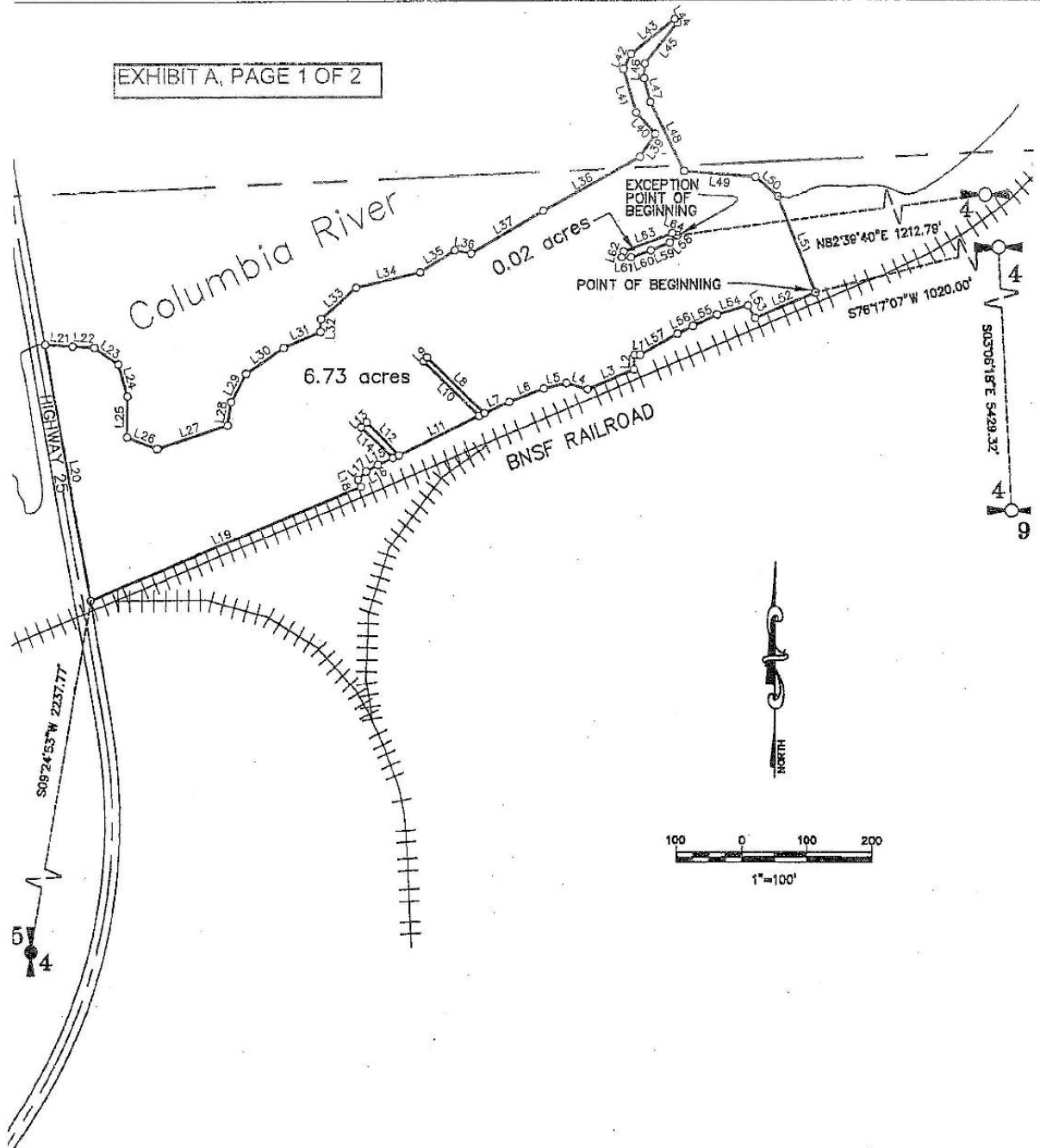


Michael A. Hibbler  
Section Manager, Toxics Cleanup Program


Dated: February, 13, 2014

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STEVENS COUNTY, WASHINGTON

EXHIBIT A, PAGE 1 OF 2



LEGAL DESCRIPTION EXHIBIT FOR THE NORHTPORT CLEANUP SITE  
WITHIN THE NE1/4 OF SECTION 4, TOWNSHIP 39 NORTH, RANGE 40 EAST, W.M. STEVENS COUNTY, WASHINGTON

 <b>MECKEL ENGINEERING &amp; SURVEYING</b> <small>3808 N. SCHREIBER HWY., COEUR D'ALENE, IDAHO, 83815 (208)867-6839 Fax (208)864-3347</small>	SCALE: 1" = 200'	DRAWN BY: DBO	JOB NO.: GE007079	
	DATE: 7-30-07	CHECKED BY: SMR	DWG: GE0070079E	
	REMSD:	CREW: EJR; DEG	SHEET: 1 OF 2	

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STEVENS COUNTY, WASHINGTON

EXHIBIT A, PAGE 2 OF 2

LINE TABLE		
LINE	BEARING	DISTANCE
L1	N88°30'15"W	8.57
L2	S02°41'11"W	22.04
L3	S67°33'50"W	77.62
L4	N73°47'07"W	34.27
L5	S76°38'39"W	35.87
L6	S69°22'22"W	57.02
L7	S65°23'58"W	41.85
L8	N46°49'58"W	124.08
L9	S43°57'26"W	8.08
L10	S46°54'08"E	120.67
L11	S64°46'26"W	139.17
L12	N45°44'12"W	71.49
L13	S47°13'50"W	11.43
L14	S47°25'09"E	67.95
L15	S66°43'55"W	26.35
L16	S60°54'57"W	20.49
L17	S45°30'00"W	17.26
L18	S22°32'17"E	11.74
L19	S67°27'54"W	447.93
L20	N10°27'37"W	393.21
L21	S86°43'24"E	42.46
L22	S86°27'29"E	33.33
L23	S56°23'43"E	45.58
L24	S16°27'30"E	50.21
L25	S00°29'40"W	61.89
L26	S69°13'12"E	48.84
L27	N72°22'26"E	114.28
L28	N08°44'03"E	35.89

LINE TABLE		
LINE	BEARING	DISTANCE
L29	N27°12'33"E	47.69
L30	N55°20'51"E	68.93
L31	N66°56'44"E	61.16
L32	N02°23'18"E	19.01
L33	N48°26'23"E	71.63
L34	N77°03'03"E	103.14
L35	N58°00'04"E	63.80
L36	S79°56'02"E	26.48
L37	N60°13'11"E	128.24
L38	N61°40'17"E	169.52
L39	N34°25'10"E	41.88
L40	N41°49'21"W	44.62
L41	N16°34'30"W	68.62
L42	N27°19'19"E	24.85
L43	N52°06'40"E	85.58
L44	S36°46'00"E	7.21
L45	S39°33'01"W	79.67
L46	S02°08'27"W	21.71
L47	S15°10'52"E	37.27
L48	S28°30'03"E	117.06
L49	S85°13'34"E	109.42
L50	S50°23'17"E	45.83
L51	S21°41'50"E	156.34
L52	S67°22'06"W	101.05
L53	N29°45'15"W	21.88
L54	S74°07'06"W	49.10
L55	S64°30'07"W	40.61
L56	S63°31'21"W	25.76
L57	S61°15'45"W	65.92

LINE TABLE		
LINE	BEARING	DISTANCE
L58	S46°31'06"W	15.61
L59	S68°09'02"W	31.89
L60	S70°53'14"W	32.43
L61	S89°46'44"W	14.25
L62	N17°25'41"E	9.48
L63	N70°02'28"E	79.82
L64	S69°18'19"E	8.51

LEGAL DESCRIPTION EXHIBIT FOR THE NORHTPORT CLEANUP SITE  
WITHIN THE NE1/4 OF SECTION 4, TOWNSHIP 39 NORTH, RANGE 40 EAST, W.M. STEVENS COUNTY, WASHINGTON



**MECKEL ENGINEERING & SURVEYING**  
300 N. SCHREIER WAY, COEUR D'ALENE, IDAHO, 83815 (208)897-4030 fax: (208)894-3347

SCALE: 1" = 200'	DRAWN BY: DBO	JOB NO.: GEO07079
DATE: 7-30-07	CHECKED BY: SMR	DWG: GEO070078E
REVISED:	CREW: EJR, DEG	SHEET: 2 OF 2

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## 6.4 Photo Log

**Photo 1: City Park and Parking Area – from the southwest**



**Photo 2: Fencing and Adjacent Railroad Tracks – from the southwest**



**Photo 3: Park and Structures - from the west**



**Photo 4: Small Areas of Exposed Soil around Trees – from the north**

