SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to <u>all parts of your proposal</u>, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determinati. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the <u>Supplemental Sheet For Nonproject Actions (Part D)</u>. Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [HELP]

1. Name of proposed project, if applicable:

BNSF Railway Black Tank Site Shallow Soil Contamination Removal

2. Name of applicant:

BNSF Railway Company and Husky Oil Operations Limited

3. Address and phone number of applicant and contact person:

BNSF Railway Company Husky Oil Operations Limited

Contact Name Shane DeGross Renee Bellavance

Address

605 Puyallup Avenue
707 8th Ave S.W., Box 6525, Stn. D,
Tacoma, Washington 98421
72P 3G7, Calgary, Alberta

Phone Number (253) 591-2547 (403) 298-6278

4. Date checklist prepared:

5/8/2018

5. Agency requesting checklist:

Washington State Department of Ecology (Ecology)

6. Proposed timing or schedule (including phasing, if applicable):

It is anticipated that the proposed work will be initiated in Late Summer/Early Fall of 2018 and completed by Late Fall of 2018.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No future additions, expansions, or activities related to the proposed project are planned at this time.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Environmental information related to this proposal is or will be presented in the following documents:

- Remedial Investigation/Feasibility Study Report, BNSF Railway Black Tank Property, 3202 East Wellesley Avenue, Spokane, Washington. ERM, March 2017.
- Cleanup Action Plan, BNSF Railway Black Tank Property, 3202 East Wellesley Avenue, Spokane, Washington. State of Washington Department of Ecology, TBD.

- Amendment No. 1 to Agreed Order No. 9188 for BNSF Railway Black Tank Property, Spokane County, WA. State of Washington Department of Ecology, TBD.
- Interim Action Work Plan for Shallow Soil Cleanup Action, BNSF Railway Black Tank Property, 3202 East Wellesley Avenue, Spokane, Washington. ERM, TBD.

The Site and surrounding properties are located within an urban industrial area where native vegetation has been significantly altered and consists of highly disturbed, arid- to semi-arid conditions, with areas that are more densely vegetated and others with very sparse cover. The vegetation is primarily composed of the herbaceous layer, containing a mixture of native and invasive grasses and forbs, with a small percent coverage consisting of deciduous shrub layer. In addition, it is unlikely that the Site and surrounding properties provide habitat for species other than transient wildlife. However, there are Washington State Department of Fish and Wildlife (WSDFW) priority habitats located within 2 miles of the Site and a number of Endangered, Threatened, Sensitive, and other Priority Species located within Spokane County that are discussed below.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

BNSF Railway Company and Husky Oil Operations Limited and Washington Department of Ecology entered into Agreed Order (AO) No. 9188 on 6 August 2012 to complete a Remedial Investigation/Feasibility Study for contamination related to historical activities at the Site. The AO is being amended to conduct an Interim Action for Shallow Soil Contamination at the Site. The work described herein is part of the interim action. The Site is within the proposed pathway of the North Spokane Corridor (NSC) project under the jurisdiction of the Washington State Department of Transportation (WSDOT). BNSF, WSDOT and Ecology entered into an agreement that: (1) provides WSDOT with right-of-way access to certain BNSF property for the NSC project, and (2) allows BNSF and Husky to implement an Ecology-approved cleanup action at the Black Tank site concurrent with the planning/design, construction and operation of the NSC freeway.

10. List any government approvals or permits that will be needed for your proposal, if known.

Washington State Department of Ecology

- Approval of Interim Action Work Plan (IAWP) Amendment to AO 9188 Work will not proceed until after Ecology has approved of the IAWP
- Washington Department of Ecology Well abandonment permit. Monitoring wells located adjacent to proposed excavation areas may require abandonment prior to excavation.
- Construction Storm Water General Permit (RCW 90.48; 33 U.S.C. Section 1251 et seq.) – May not be required due to size of excavation area not exceeding threshold requirements.
- SEPA determination (RCW 43.21C and Chapter 197-11 WAC)

City of Spokane

Grading Permit

Spokane Regional Clean Air Agency

Notice of Intent Permit

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

BNSF Railway and Husky Oil Operations Limited are required to complete an interim action on the Site to remove soils that were previously contaminated by historical releases of diesel and Bunker C fuel. Approximately 11,460 square feet of the Site will be excavated to depths up to 15 feet below ground surface (bgs) using conventional excavation methods. Prior to beginning excavation, approximately 1,800 linear feet of known underground piping and infrastructure remaining within the Site boundaries will be removed and disposed at an off-Site landfill. Some of the underground piping is wrapped with asbestos-containing material that will be removed, bagged, and disposed of at an appropriate landfill in accordance with Spokane County Clean Air Agency regulations. Less than 1,000 linear feet of the piping is known to be wrapped with asbestos-containing material. Excavated soils will be temporarily stockpiled on site then transported via truck and trailer or rail to an approved landfill for disposal. All excavations will be backfilled with clean fill to their original grade and appropriately compacted. The proposed project also includes backfilling the partially filled excavation area where petroleum-contaminated soil was previously removed from beneath the former Black Tank (Figure 2). The partially filled excavation area is approximately 16,000 square feet in size and about 7 feet deep. Backfill material and compaction shall comply with specifications provided by WSDOT and BNSF.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The Site, referred to as the BNSF Railway Black Tank Property, is generally located at 3202 East Wellesley Avenue in Spokane, Washington (Figure 1). It is situated in an industrial and transportation corridor in the Hillyard neighborhood of northeast Spokane. The Site is located in the northwest quarter of Section 3, Township 25 North, Range 43 East, of the Willamette Meridian, along a main north-south trending BNSF railway line. The proposed project will be completed on Spokane County Tax Parcel Numbers 35032.4501 and 35032.4401 and near the BNSF railway right-of-way (Figure 2).

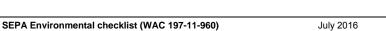
Spokane County Parcel 35032.4501 legal description:

MINNEHAHA ADDITION NORTH BEG AT NE COR OF LT 6, BK 108, TH S ALG E LNS OF STS 6 & 7 OF BK 108 TO SE COR OF LT 7, TH W ALG S LN OF LT 7 & ALG SD S LN EXTENDED W ACROSS RALPH ST TO SE COR OF BK 109, THS ALG E LN OF BK 109 EXTENDED S ACROSS HOFFMAN AVE TO NE COR BK 102, TH CONTINUING S ALG E LN OF BK 102 TO SE COR OF BK 102, TH W ALG S LN OF BK 102 TO SE COR OF LT 7 IN SD BK 102, TH S ALG E LN OF SDLT 7 EXTENDED S ACROSS HEROY AVE TO NE COR OF LT 3 OF BK 95, TH CONTINUING S ALG E LNS OF LTS 3, 4, 5, 6 & 7 OF BK 95 & ACROSS LONGFELLOW AVE TO NE COR OF LT 3 OF BK 88 & CONTINUING S ALG E LNS OF LTS3, 4, 5, 6 & 7 OF BK 88 & ACROSS RICH AVE TO NE COR OF LT 3 OF BK 81, TH W ALG N LN OF LT 3 TO NW COR OF SD LT 3 OF BK 81, TH N ACROSS RICH AVE TO SW

COR OF BK 88, TH CONTINUING N ALG W LNS OF BKS88, 95, 102 & 109 A ALG SD W LNS EXTENDED ACROSS LONGFELLOW AVE & HEROY AVE & HOFFMAN AVE TO NW COR OF BK 109, TH E ALG N LN OF BK 109 & ALG SD N LN EXTENDED ACROSS RALPH ST TO NW COR OF LT 6 OF BK108 & ALG N LN OF SD LT 6 TO POB & INCLUDING ALL STREETS & AVENUES & ALLEYS CONTAINED WITHIN THE ABOVE DESCRIPTION.

Spokane County Parcel 35032.4401 legal description:

MINNEHAHA ADDITION NORTH BEG AT NE COR OF LT 6, BLK 108; TH S ALG E LNS OF LTS 6 & 7 OF BLK 108 TO SE COR OF LT 7: TH W ALG S LN OF LT 7 & ALG SD S LN EXTENDED W ACROSS RALPH ST TO SE COR OF BLK 109:TH S ALG E LN OF BLK 109 EXTENDED S ACROSS HOFFMAN AVE TO NE COR OF BLK 102; TH CONTINUING S ALG E LN OF BLK 102 TO SE COR OF BLK 102; TH W ALG S LN OF BLK 102 TO SE COR OF LT 7 IN SD BLK 102; TH SALG E LN OF SD LT 7 EXTENDED S ACROSS HEROY AVE TO NE COR OF LT 3 OF BLK 95; TH CONTINUING S ALG E LNS OF LOTS 3, 4, 5, 6, & 7 OF BLK 95 & ACROSS LONGFELLOW AVE TO NE COR OF LT 3 OF BLK 88 & CONTINUING S ALG E LNS OF LTS 3, 4, 5, 6, & 7 OF BLK 88 & ACROSS RICH AVE TO NE COR OF LT 3 OF BLK 81: TH W ALG N LN OF LT 3 TO NW COR OF SD LT 3 & OF SD BLK 81; TH S ALG W LN OF BLK 81 TO SW COR OFBLK 81; TH E ALG S LN OF SD BLK TO SE COR OF SD BLK 81; TH N ALG E LN OF BLK 81 & ALG SD E LN EXTENDED N ACROSS RICH AVE TO SE COR OF BLK 88; TH E ALG S LN EXTENDED E OF BLK 88 ACROSS RALPH ST TO SWCOR OF BLK 89; TH CONTINUING E ALG S LNS OF BLKS 89 & 90 & ALG SD S LNS EXTENDED ACROSS THOR ST TO SE COR OF BLK 90; TH N ALG E LNS OF BLKS 90, 93, 104, & 107 & ALG SD E LNS EXTENDED ACROSS LONGFELLOWAVE & HEROY AVE & HOFFMAN AVE TO NE COR OF BLK 107: TH W ALG N LNS OF BLKS 107 & 108 & ALG SD N LNS EXTENDED ACROSS THOR ST TO NE COR OF LT 6 OF BLK 108 & POB & INCLUDING ALL THE STREETS & AVENUES &ALLEYS CONTAINED WITHIN THE ABOVE DESCRIPTION NOW FULLY VACATED.



B. Environmental Elements [HELP]

1. Earth [help]

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other	a. General description	of the site:	
	(circle one): Flat.)rollin	g. hilly, steep slopes, mountainous, other	

The interim action will be completed within the boundaries of the BNSF Railway Black Tank Property as shown on Figure 2. The Site is largely inactive, vacant, and unpaved. The majority of structures associated with previous operations have been removed. An active rail line traverses the site along the western Site boundary and an active rail spur traverses the southern Site boundary and serves Western State Asphalt on the adjacent property, also referred to as the SemMaterials L.P. Spokane site.

The Site is situated at an elevation of approximately 2,035 feet above mean sea level. The Site is relatively flat with a few piles of soil and debris up to 5 feet high and low areas up to 10 feet deep along the rail lines and at the former Black Tank excavation.

b. What is the steepest slope on the site (approximate percent slope)?

The steepest slope on the Site is the partially filled Black Tank excavation area which has slopes of approximately 1:1 (Figure 3). The partially filled excavation encompasses one of the proposed excavation areas (SSA-5; Figure 3) and is located adjacent to another proposed excavation area (SSA-1; Figure 3).

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The Site is located on Pleistocene glaciofluvial flood deposits, consisting of interbedded sand and gravel deposits. The sand and gravel deposits are generally gray to brown, poorly sorted, and contain more gravel at shallow depths. Lenses and ribbons of silt and silty sand are scattered throughout the sand and gravel deposits.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

There are no known locations of unstable soils within the project vicinity.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Approximately 11,460 square feet of excavation will be required to remove petroleum-contaminated soils and implement the interim action. Work will include approximately 6,400 cubic yards (CY) of excavation. Work will also include backfilling the interim action excavation areas and the partially filled Black Tank excavation area with approximately 10,600 CY of clean structural fill. The source of clean structural fill has not been determined at this time.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

The Site is unpaved and erosion could occur during construction and concurrent heavy rainstorms. However, erosion potential will be minimized during site construction through

implementation of Best Management Practices and any additional erosion control measures required by regulatory agencies.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt, or buildings)?

None.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

During construction, a temporary erosion and sediment control (TESC) plan and associated BMPs will be implemented to minimize and control potential erosion during construction.

2. Air [help]

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Exhaust emissions from vehicles and heavy equipment (e.g., trucks, excavator) will occur during construction. Temporary airborne dust may be generated during excavation work. Wrapped underground piping on the Site is known to contain asbestos and removal of the piping could result in air emissions. Construction-related emissions will only occur intermittently and on a temporary basis. The completed project will not produce air emissions.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

The project will not be affected by off-site sources of emissions or odors.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Contractors will implement best management practices to control vehicle emissions and dust. Construction vehicles and equipment will be maintained per applicable air emission standards. When piping having asbestos-containing wrapping is exposed for removal, the asbestos-containing material will be abated by a Washington State Department of Labor and Industries-certified asbestos abatement contractor following applicable regulations to minimize the potential for emissions.

3. Water [help]

- a. Surface Water: [help]
 - 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

There are no surface water bodies on or in the immediate vicinity of the Site. The nearest surface water is the Spokane River located approximately 1.5 miles south of the Site.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

Not applicable.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No. The FEMA Flood Insurance Rate Map for the project area does not identify the Site as being located within a 100-year floodplain.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No.

- b. Ground Water: [help]
 - 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

No. The project does not include withdrawing groundwater or discharges to groundwater.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Not applicable.

- c. Water runoff (including stormwater):
 - 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Storm water at the Site generally stays within the Site boundaries and rapidly infiltrates the highly permeable surface soils or evaporates. Neither the construction activity nor the completed project are expected to alter storm water runoff at the Site.

2) Could waste materials enter ground or surface waters? If so, generally describe.

No. There are no surface waters on or in the vicinity of the Site. Groundwater is located approximately 158 to 179 feet below ground surface at the Site, has been impacted by historical releases of petroleum hydrocarbons at the Site, but will not be adversely impacted by this project, which involves excavation of shallow contaminated soil.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

The proposal will temporarily alter drainage patterns in the vicinity of the excavations, but the excavations will be backfilled so that the current drainage patterns on or in the vicinity of the Site will be restored.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

Not applicable.

1 D	14-		ا سا
4. P	lants	lhe	a

Check the types of vegetation found on the site:
deciduous tree: alder, maple, aspen, other
evergreen tree: fir, cedar, pine, other
pasture
crop or grain
Orchards, vineyards or other permanent crops.
wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
water plants: water lily, eelgrass, milfoil, other
X other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

Approximately 500 square feet of shrubs and grasses will be removed to conduct excavation.

c. List threatened and endangered species known to be on or near the site.

There are no known threatened or endangered plant species are on or near the Site.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

No landscaping or revegetation is proposed.

e. List all noxious weeds and invasive species known to be on or near the site.

There are no noxious or invasive plant species that are known to be on or near the Site.

5. Animals [help]

a. List any birds and <u>other</u> animals which have been observed on or near the site or are known to be on or near the site.

Because the Site has been significantly altered, it is not anticipated to provide habitat other than for transient wildlife (e.g., hawks, eagles, owls, winter waterfowl, and deer); however, marmots have been observed as permanent residents on the Site.

The Beacon Hill Biodiversity Region is located about 1.5 miles east of the Site and includes habitat for white-tailed deer, moose, elk, red-tailed hawk, Cooper's hawk, great horned owl, saw-whet owl, and pygmy owls. The Spokane River corridor, located about 1.5 miles south of the Site, provides riparian habitat for winter waterfowl, nesting red-tailed hawk, and some occurrences of nesting osprey and wintering bald eagles.

b. List any threatened and endangered species known to be on or near the site.

There are no threatened or endangered species known to be on or in the immediate vicinity of the Site.

c. Is the site part of a migration route? If so, explain.

No migration routes are known to include or be located in the vicinity of the subject property.

d. Proposed measures to preserve or enhance wildlife, if any:

None.

e. List any invasive animal species known to be on or near the site.

None. .

6. Energy and Natural Resources [help]

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Not applicable. The completed project does not require an energy source.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

The completed project will not require an energy source. Therefore, no energy conservation measures are proposed.

7. Environmental Health [help]

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe.

Potential health and safety hazards that may be present during construction could include possible exposures associated with vehicles and heavy equipment, leaks and spills, contact with petroleum compounds, asbestos-containing materials, and/or release of contaminated soils. Proper precautions will be implemented to minimize potential risk to human health and the environment.

It is not anticipated that the completed project will result in environmental health hazards. The purpose of the project is to reduce risk to human health and the environment by cleaning up contaminated soils to achieve the Model Toxics Control Act (MTCA) Method A cleanup level for unrestricted land use.

1) Describe any known or possible contamination at the site from present or past uses.

The Site was historically used for railroad transport and locomotive fueling and maintenance operations and an asphalt storage and transfer system. Historical releases from these systems have resulted in surface soils (≤15 feet bgs) contaminated with petroleum hydrocarbons, naphthalenes, carcinogenic polycyclic aromatic hydrocarbons at concentrations exceeding Washington State MTCA Method A soil cleanup criteria for unrestricted land use. Analytical testing shows the petroleum contamination is a mix of Bunker C, asphaltic oils, and diesel.

Historical petroleum product releases in the vicinity of the Black Tank Sump and the Blank Tank and Chemical Solution Pipelines and Dispensers (Figure 2) migrated in narrow vertical columns from the surface soil to the groundwater table at approximately 175 feet bgs. The releases resulted in petroleum contamination in intermediate soils (≥ 15 feet bgs - 156 feet bgs), smear zone soil (≥ 156 feet bgs), light non-aqueous phase liquid, and groundwater.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

The following hazardous chemicals/conditions are in the vicinity of the proposed project area and will dictate the proposed cleanup design.

- Petroleum-contaminated surface soils as described in Section 7.a.1 of this document.
- Remaining underground piping and infrastructure associated former fueling operations that may contain residual petroleum products.
- Asbestos-containing pipe wrap on some of the remaining underground piping.
- Active rail lines in the vicinity of the proposed excavation areas.

 Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

During construction, excavated soils may be temporarily kept on-site in transport vehicles, covered stockpiles on top of HDPE sheeting, containment bins, or other containment measure(s). Temporary storage of contaminated soils, if needed, would be short term prior to export to an approved landfill.

The completed project will not store, use, or produce toxic or hazardous chemicals.

4) Describe special emergency services that might be required.

It is not anticipated that special emergency services will be required.

5) Proposed measures to reduce or control environmental health hazards, if any:

The primary purpose of the project is to reduce environmental risk associated with petroleum-impacted soils. Proposed measures to reduce or control environmental health hazards include:

- Pre-construction meetings to inform personnel of the various health and safety risks associated with the project. All contractors and personnel associated with project construction will follow health and safety protocols.
- Workers conducting construction activities will be instructed on precautionary actions to avoid direct contact with potentially contaminated soils, appropriate methods for handling such materials, and personal protective equipment.
- Methods and protocols will be implemented in accordance with facility, local, state, and federal standards to avoid potential release of hazardous materials during construction.
 - Asbestos-containing pipe wrap that is intact will be segmented and removed in manageable lengths then bagged for disposal at an approved landfill. For pipe wrap that is not intact, glove bags will be used to contain asbestos while segmenting the piping for removal.
 - Prior to removing piping, the presence of residual petroleum products will be assessed. If petroleum product is present within remaining piping, it will be removed prior to removing the piping.
- BNSF Track Safety will complete a site walk to identify the necessary track safety controls. If necessary, BNSF flaggers will manage rail traffic during construction activities to mitigate risks associated with work near active rail lines. Contaminated soil will be transported to an approved landfill.
- Spill response materials will be readily available for use during construction.
- A TESC plan and associated BMPs will be implemented, including dust control measures, as applicable.

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Noise in the Site vicinity comes from personal vehicles, freight trucks, rail cars, heavy machinery, and other industrial processes. However, none of these will adversely affect the project proposal.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Some short-term noise will be generated during the cleanup work. The project-related noise is expected to be typical of industrial construction projects and will likely include, but is not limited to, noise from vehicles, heavy equipment, excavation, and fill activities. Construction equipment may include dump trucks, excavators, and loaders. The proposed activities and associated noise levels will generally occur during daylight hours, but some evening work may also be required to achieve the project schedule. Noise generated by project development is expected to be within the range of normal activities in the area and is not expected to be disruptive. The completed project will not generate any noise.

3) Proposed measures to reduce or control noise impacts, if any:

No measures are proposed other than continued compliance with applicable noise regulations. The completed project will not result in a net increase in noise.

Temporary construction noise is expected to be compatible with existing industrial activities on the Site and the surrounding industrial area.

8. Land and Shoreline Use [help]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The current land use of the site and adjacent properties is industrial and includes a transportation corridor having an active main BNSF rail line and an active truck route to the neighboring Western States Asphalt facility. Other areas of the Site are inactive. The proposed project will not affect the current land uses on the Site or surrounding properties.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

No farm or forest operations are or have been on or in the vicinity of the Site.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

Not applicable.

c. Describe any structures on the site.

No buildings are currently on the Site; however, remnants of building foundations are present, as well as an active railway.

d. Will any structures be demolished? If so, what?

Yes, residual underground piping and infrastructure (a former sump and associated building foundations) from the former fueling operations will be removed from the Site.

e. What is the current zoning classification of the site?

The Site is currently zoned for Light Industrial use by the City of Spokane.

f. What is the current comprehensive plan designation of the site?

Light Industrial.

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable. The Site is located over 1-mile from the nearest shoreline.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

No designated critical areas are located on the property.

i. Approximately how many people would reside or work in the completed project?

None, the completed project does not include housing units and it will not increase the number of employees working on-site.

j. Approximately how many people would the completed project displace?

None.

k. Proposed measures to avoid or reduce displacement impacts, if any:

Not applicable.

L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

The Department of Ecology reviews and approves the proposed cleanup action for the Site to ensure that it is protective of current and future land uses.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

Not applicable. There are no designated agricultural or forest lands of long-term commercial significance in the vicinity.

9. Housing [help]

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

Not applicable.

c. Proposed measures to reduce or control housing impacts, if any:

Not applicable.

10. Aesthetics [help]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

Not applicable.

b. What views in the immediate vicinity would be altered or obstructed?

No views will be altered or obstructed as a result of the project.

c. Proposed measures to reduce or control aesthetic impacts, if any:

Not applicable.

11. Light and Glare [help]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

The completed project will not produce light or glare.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

Not applicable.

c. What existing off-site sources of light or glare may affect your proposal?

There are no known off-site sources of light or glare that will affect the proposal.

d. Proposed measures to reduce or control light and glare impacts, if any:

Temporary light and glare that may be generated by potential evening construction activities will be minimal due to the limited project area, the relatively large buffer zone between the project area and neighboring properties and the short project schedule. Temporary light and glare is not expected to add to or be out of character with other industrial operations in the surrounding area. The completed project will not generate light or glare.

12. Recreation [help]

a. What designated and informal recreational opportunities are in the immediate vicinity?

There are no designated or informal recreational opportunities in the immediate vicinity of the Site. The nearest recreational opportunities include the Esmeralda Golf Course, Shaw Middle School, Hays Park, Wildhorse Park, Kehoe Park, and Loren Kondo Park, which are between 0.25 and 0.9 miles from the Site.

b. Would the proposed project displace any existing recreational uses? If so, describe.

No.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

The completed project will not impact recreational opportunities in the area. Temporary construction vehicle access to and from the Site is not expected to adversely affect the public's ability to access recreational opportunities. Temporary traffic control measures will be implemented during construction as needed.

13. Historic and cultural preservation [help]

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

There are no known structures or sites located on or in the immediate vicinity of the Site that are listed or eligible for listing on national, state or local preservation registers. Based on the Washington Department of Archaeology and Historic Preservation (DAHP) Washington Information System for Architectural and Archaeological Records Data (WISAARD) database, the closest known structures that may be eligible for listing on the National Register; Washington Heritage Register is Hillyard Historic Business District and Hillyard High School. However, the business district is located approximately 1,600-feet northwest of the Site, and the high school is located approximately 3,000-feet northwest of the Site. Neither property will be affected by the proposed work.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

There are no known landmarks, features, or other evidence of cultural or historic use on the Site. Based on review of the DAHP WISAARD database, there are no previously recorded sites located within the project area of potential affect.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

Research included review of publicly available on-line resources including HistoryLink.org and the DAHP WISAARD database, which includes maps and site forms.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

No measures are proposed because there are no known historic or cultural resources within the Site.

14. Transportation [help]

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

Roads providing access to the proposed project include East Wellesley Avenue and North Thor Street. Existing accesses to East Wellesley Avenue and North Thor Street will be retained. During construction, vehicular transport of equipment, materials and contractors will enter and exit the project site via existing road accesses.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

No, the proposed project is located on private property that is not served by public transportation. The nearest transit stop is Route 33 located approximately 500 feet west of the subject project on North Market Street.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

None. No new parking spaces will be created or eliminated.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

No, the project will not require new roads, streets, or improvements to existing transportation infrastructure.

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

Project work will not use or occur in the immediate vicinity of water or air facilities however, some of the proposed work will occur adjacent to an active rail line and a rail spur that serves the adjacent Western States Asphalt facility. WSDOT is performing a separate project that involves relocation of certain rail lines. This project is being coordinated with the WSDOT project to minimize disruption to rail service.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?

None. The completed project will not generate additional vehicular trips.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No.

h. Proposed measures to reduce or control transportation impacts, if any:

Potential mitigation measures for construction traffic may include one or a combination of the following as applicable:

- Provide construction flaggers during periods of peak construction traffic, as needed.
- Identify construction haul route(s) that minimize or avoid use of heavily traveled roadways, where practicable.
- Work may be conducted on weekends and may include evening hours to avoid temporary increases in peak traffic volumes during the workweek.

15. Public Services [help]

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

No. The project will not generate additional need for public services.

b. Proposed measures to reduce or control direct impacts on public services, if any.

Not applicable. No measures are proposed.

16. Utilities [help]

a. Circle utilities currently available at the site:

electricity natural gas water, efuse service, telephone sanitary sewer septic system, other

d. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity, which might be needed.

No new or additional utility services are proposed.

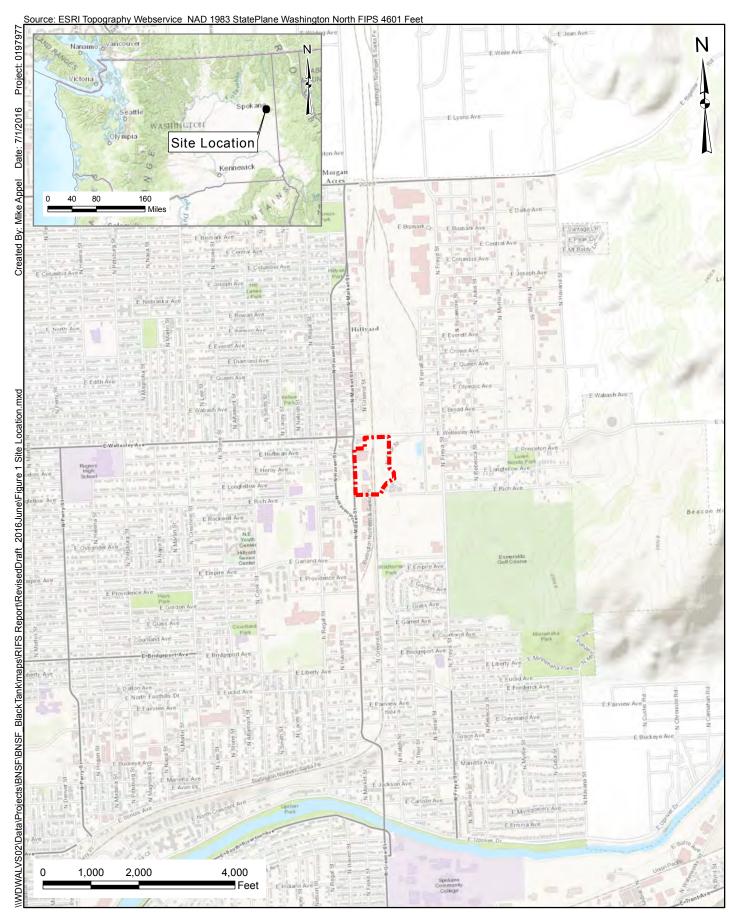
C. Signature [HELP]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:	DRAFT
Name of signee	DRAFT
Position and Agency/Organization	DRAFT
Date Submitted: DRAFT	

Figures



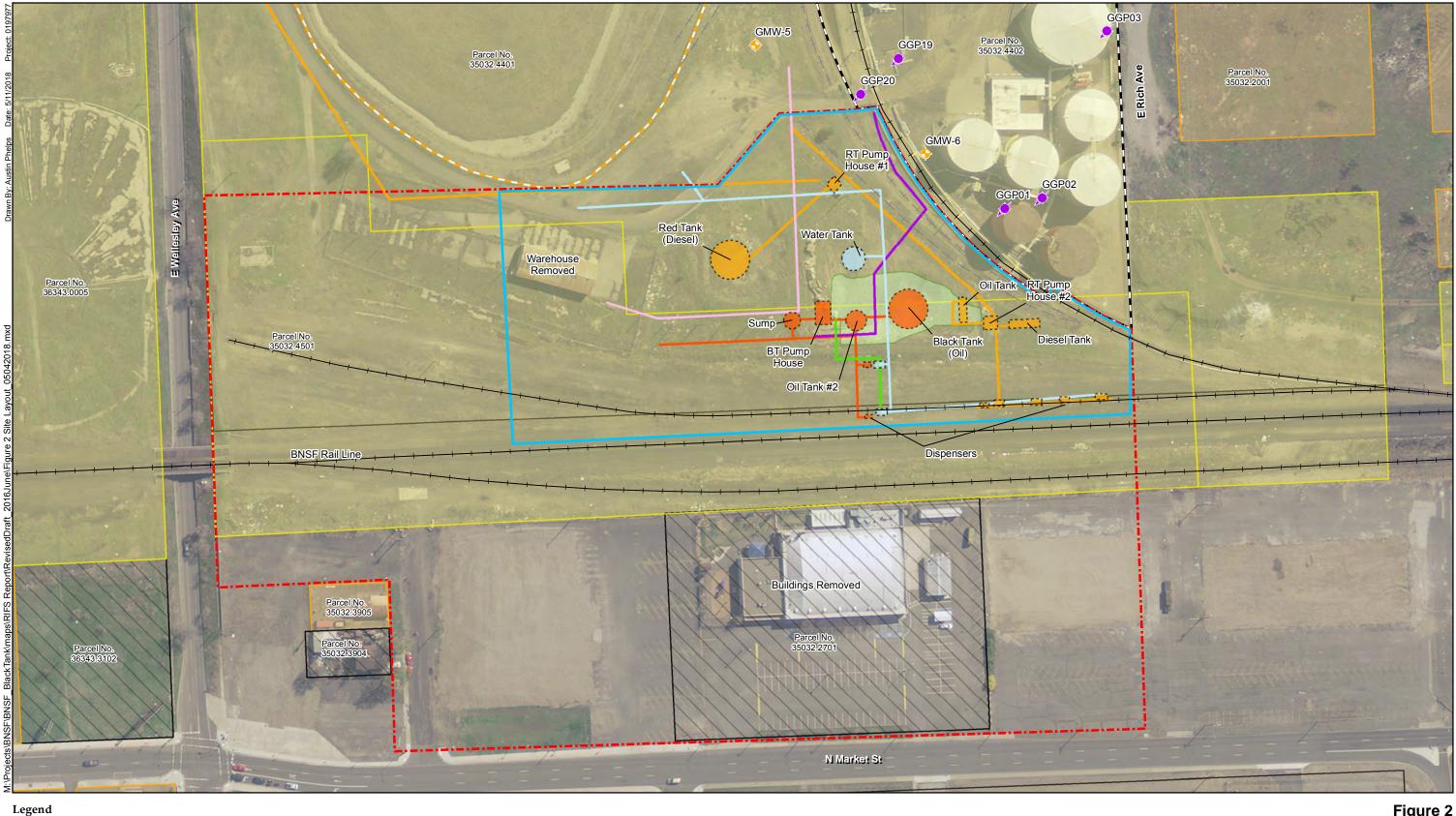


Legend





Figure 1 Site Location BNSF Black Tank Spokane, Washington



Notes:

Aerial Photo: USGS, April 2012.

Historical Aboveground Storage Tank SemMaterials Monitoring Well Aluminum Recycling Corporation, BNSF Dross Cap Site Boundary Other-Owned Properties Steam Pipeline SemMaterials Direct-Push Boring BNSF Hillyard Lead Site Black Tank Oil Pipeline (1937) Water Pipeline WSDOT-Managed Easements --- Red Tank Oil Pipeline (1937) 240 SemMaterials L.P. Spokane Site Boundary Former Black Tank Excavation Proposed BNSF Black Tank — Chemical Solution Pipeline (1937) Site Boundary Tax Parcel Ownership — Liquid Asphalt Pipeline (1956)

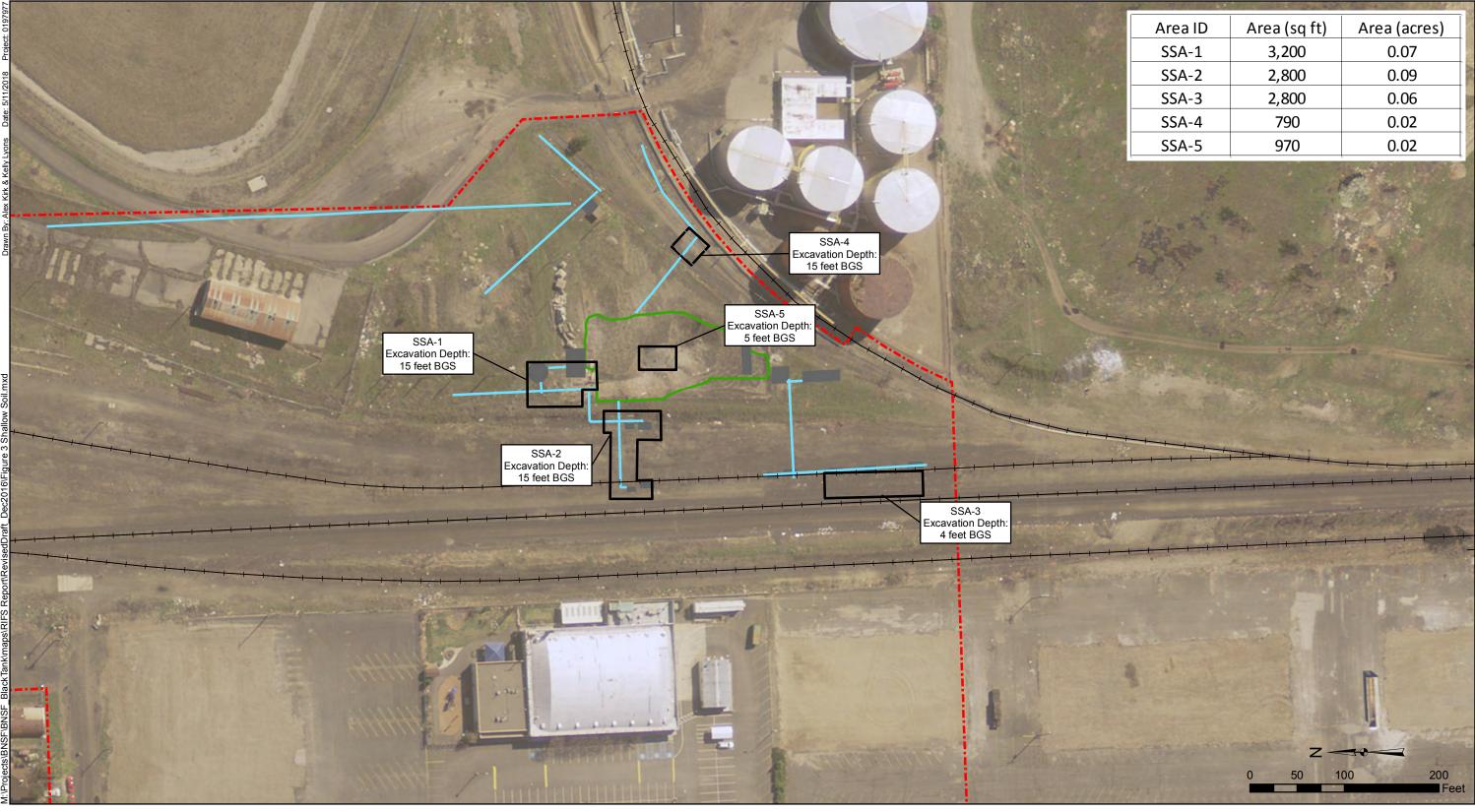
Interim Action Area

BNSF-Owned Properties

Figure 2
Site Layout and Tax Parcels
BNSF Black Tank
Spokane, Washington

Environmental Resources Management www.erm.com

DRAFT



Legend

Existing Piping (Petroleum and Chemical Solution)

Proposed BNSF Black Tank Site Boundary

Approximate Lateral Limits of Surface Soil Cleanup Areas

Former Black Tank Excavation

Historical Aboveground Storage Tank, Sump or Pump House

Notes:
BGS: Feet Below Ground Surface
CUL = Cleanup Level
TPH-D/HO = Combined Diesel and Heavy
Oil-Range Petroleum Hydrocarbons
Preliminary CUL = 13,600 milligrams per kilogram
Aerial Photo: USGS, April 2012.

Figure 3 Shallow Soil Removal Areas BNSF Black Tank Spokane, Washington

