

# SHORELINE PERMIT APPLICATION

*Attach an additional sheet if needed*

**The proposed action requires approval of:**

- Shoreline Substantial Development Permit (SSDP)
- Shoreline Conditional Use Permit (SCUP)
- Shoreline Variance (SV)

**All Shoreline Permits must provide the following information:**

- 1. Identify the name of the shoreline (water body) with which the site of the proposal is associated.**

Spokane River

- 2. Provide a general description of the proposed project, including the proposed use or uses and the activities necessary to accomplish the project.**

Riverbend Phase 2 – will consist of two multi-family buildings with on-site parking. It is also likely that this project will include some limited commercial uses to support the residents, guests and public visitors. The Applicant has a pending purchase agreement on nearby property that may be available for some off-site parking (Parcel Nos. 35174.0568, .0579 and .0599).

- 3. Provide a general description of the property and adjacent uses, including physical characteristics, intensity of development, improvements, and structures.**

The property is presently vacant with less than a two percent (2%) grade moving from the Spokane River to the south. The soil is generally imported fill, which related to past industrial activities, as well as "institutional controls" performed under the Model Toxic Control Act in 2002. The property is bisected by the Hamilton Street Bridge with bridge piers located in the center of the property. The development will consist of two seven-story buildings with one containing 58 multi-family units and the other containing 76 multi-family units. Vehicle parking will be located on the ground and first floors of the eastern building.

- 4. What is the estimated total Fair Market project cost within the Shoreline Jurisdiction?**

\$44,200,000.00

- 5. Will the proposed development intrude waterward of the ordinary high water? X NO If yes, describe the intrusion:**

6. **Will the proposed use or development affect existing views of the shoreline or adjacent waters?** X NO  
If yes, describe:

7. **Explain how the proposed use will not unreasonably interfere with the normal public use of public shorelines.**

At present, the property is vacant without structures or improvements. There is public access to the shoreline via an asphalt path.

Riverbend Phase II will be located to the south of Riverbend Phase I, a project which was previously permitted under Spokane Planning and Zoning file no. Z2001-17-SL/BSP, as amended. Phase I will occupy the north half of the property and will consist of two four-story buildings with between 115 and 125 multi-family units. The Phase I buildings will be located to take advantage of the river amenity to include additional development of the public trail, landscaping, greenspace and other open areas where the public can view and approach the shoreline of the Spokane River.

Phase II will be south of Phase I and will maintain and take advantage of the pedestrian access to the river as well as establish view corridors from the property and its surrounds.

8. **Please explain how the proposal is consistent with the map, goals, and policies of the Shoreline Master Program.**

The State's policy for shoreline management is to "foster all reasonable and appropriate uses, promote and enhance the public interest, and protect against adverse effects to the public health, the land and its vegetation and wildlife [including the waters of the state]." RCW 90.58.020. The City Shoreline Master Plan (SMP) establishes "Shoreline Environments and Management Policies" that: (1) categorize shoreline areas; (2) manage shoreline use; and (3) provide for modification and development. CP, Shorelines 14, p. 12. The Intensive Urban Environment (IUE) is designed to "ensure optimum, intensive public utilization of shorelines" for a variety of urban uses. CP, Shorelines 14, p. 19.

A. SMP 1 "General Goals and Policies," p. 22.

SMP 1.2 "Consistency with other Plans and Programs" - ensure that the Shoreline Master Program is consistent with the goals and policies and land use plan of the City of Spokane. As set forth in the Conditional Use Application, the proposed development is permitted under a conditional use permit recognizing that this development is occurring on a piece of land that for many years was an industrial activity that did not allow access to the shoreline. This project completely changes the prior use in order to bring people closer to the river for purposes of housing, recreation, and lifestyle, under the SMP.

SMP 1.3 "no net loss of ecological functions" - the property and river environment will be enhanced and maintained consistent with the proposed use. There is no development within the shoreline setback. Thus ecological functions will not be disturbed. Natural resources will further be protected by additional environmental cleanup and a "cap" via impervious surfaces, which should reduce the likelihood of hazardous substances migrating or otherwise causing additional contamination pursuant to the existing and amended Consent Decree.

SMP 1.6 "Policy Priorities." The City policy is to promote and foster all reasonable and appropriate uses of the Shoreline. CP, Shorelines 14, p. 22. This development will increase the development of pathways and trails along the Spokane River. The existing River trail will be enhanced and promote trail access throughout this corridor and a large part of the Spokane neighborhood system. See attached. This means there will be

connectivity to the University District, Downtown, the Centennial Trail and other developed bicycle pathways. The public will benefit by having the opportunity to enjoy and experience the aesthetic qualities of the Spokane River. CP, Shorelines 14, p. 24.

With respect to capital facilities - All city utilities exist, no new streets will be constructed, and transportation facilities will be located on the southern portion of the property, away from the Spokane River. CP, Shorelines 14, p. 25. Under SMP "Circulation," policies 3.1 through 3.7 should be satisfied, which means improved access to the shoreline, streets will be on the "landward side of the development," the consolidated transportation corridors developed by the City will be utilized and no new streets will be located within this development. Parking facilities and thus parking impacts will be located on the landward side of the development furthest away from the Spokane River. CP, Shorelines 14, p. 26.

There are no critical areas on the subject property but native plants will be conserved to the extent possible. CP, Shorelines 14, p. 27.

A large component of the City Shoreline Master Plan is "public access." As stated above, access to the river will be improved and enhanced, which will not only increase a person's ability to move along the river, but also enhance shoreline views, shoreline use, and appreciation/protection of shoreline ecological functions. The University District, the Central Business District, surrounding civic and cultural facilities as well as adjacent neighborhoods attract and facilitate the public's access to this newly developed area. See SMC 8 "Public Access." CP, Shorelines 14, p. 32.

**9. A detailed narrative of how the impacts of the proposal have been analyzed to achieve no net loss of shoreline ecological functions, including each step of the mitigation sequencing process, as defined in Section 17E.060.220 SMC.**

The purpose of mitigation sequencing is to "achieve no net loss of shoreline ecological functions." SMC 17E.060.220. The property, including its shoreline, has been significantly modified throughout the last 75 years. This project will not cause a net loss of shoreline ecological functions. Further, because this property is subject to an existing Consent Decree significant mitigation, rehabilitation and restoration has occurred (and will continue) under the Model Toxic Control Act. This development will enhance the shoreline use, its ecological functions and will not cause a net loss of ecological functions as set forth in this application. Attachment 1 contains documents submitted to WSDOE that describe the historical use of the property, environmental clean-up, mitigation and restrictive covenants.

**10. List of permits required from other than City of Spokane agencies, include name of agency, date of application, and number of application.**

N/A

**In addition to Questions 1-10, all Shoreline Conditional Use Applications must ALSO provide the following information:**

**11. List the provisions of the land use code that allows the proposal.**

See Conditional Use Permit Application.

**12. Please explain how the proposal is consistent with the comprehensive plan designation and goals, objectives and policies for the property.**

See Conditional Use Permit Application.

**13. Please explain how the proposal meets the concurrency requirements of SMC Chapter 17D.010.**

See Conditional Use Permit Application.

**14. Please explain any significant adverse impact on the environment or the surrounding properties the proposal will have and any necessary conditions that can be placed on the proposal to avoid significant effects or interference with the use of neighboring property or the surrounding area, considering the design and intensity of the proposed use.**

None anticipated.

**15. Please explain how the cumulative impact of several additional conditional use permits on the shoreline in the area will not preclude achieving the goals of the shoreline master program.**

This property is located on a bend in the Spokane River, adjacent to Martin Luther King, Jr. Parkway with development across the river. Future development could occur to the west. Given the Intensive Urban Environment designation and developed infrastructure the goals stated herein would not be compromised.

**In addition to Questions 1-15, all Shoreline Variance Applications must provide the following additional information:**

N/A

**16. Fill out the following information for the variance being requested:**

	<i>REQUIRED</i>	<i>PROPOSED</i>
Front yard setback		
Rear yard setback		
Side yard setback		
Lot coverage percentage		
Lot size		
Lot width		
Height		
Other (specify):		

**17. What physical characteristics of the property interfere with your ability to meet the required standards?**

**18. How does this property physically differ from other similarly zoned properties in the area and how do the physical characteristics of the subject property prevent developing to the same extent?**

**19. What hardship will result if the requested variance is not granted?**

**20. Does compliance with the requirement eliminate or substantially impair a natural, historic, or cultural feature of area-wide significance? If yes, please explain.**

**21. Will surrounding properties suffer significant adverse effects if this variance is granted? Please explain.**

**22. Will the appearance of the property be inconsistent with the development patterns of the surrounding property? Please explain.**

**23. Variance permits for development that will be located landward of the ordinary high water mark (OHWM), as defined in RCW 90.58.030(2)(b), and/or landward of any wetland as defined in RCW 90.58.030(2)(h), may be authorized; provided, the applicant can demonstrate all of the following:**

- a. That the strict application of the bulk, dimensional or performance standards set forth in the applicable master program precludes, or significantly interferes with, reasonable use of the property.**

- b. That the hardship described in (a) of this subsection is specifically related to the property, and is the result of unique conditions such as irregular lot shape, size, or natural features and the application of the master program, and not, for example, from deed restrictions or the applicant's own actions.
- c. That the design of the project is compatible with other authorized uses within the area and with uses planned for the area under the comprehensive plan and shoreline master program and will not cause adverse impacts to the shoreline environment.
- d. That the variance will not constitute a grant of special privilege not enjoyed by the other properties in the area;
- e. That the variance requested is the minimum necessary to afford relief.
- f. That the public interest will suffer no substantial detrimental effect.

24. Variance permits for development that will be located waterward of the ordinary high water mark (OHWM), as defined in RCW 90.58.030(2)(b), or within any wetland as defined in RCW 90.58.030(2)(h), may be authorized; provided, the applicant can demonstrate all of the following:

- a. That the strict application of the bulk, dimensional or performance standards set forth in the applicable master program precludes all reasonable use of the property.
- b. That the proposal is consistent with the criteria established under WAC 173-27-170(2)(b) through (f).

- c. **That the public use of the shorelines will not be adversely affected.**

**ATTACHMENT 1**

**SHORELINE PERMIT APPLICATION**

**SAGAMORE SPOKANE, LLC**





**FINAL CLEANUP ACTION PLAN**  
**HAMILTON STREET BRIDGE SITE**  
**SPOKANE, WA**

**Washington Department of Ecology**

**Eastern Regional Office**

**Toxics Cleanup Program**

**AUGUST 10, 2001**

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## EXECUTIVE SUMMARY

This Final Cleanup Action Plan (FCAP) presents the selected remedial action for the Hamilton Street Bridge Site located in Spokane, Washington, developed in accordance with the Model Toxics Control Act (MTCA), Chapter 70.105D RCW and Chapter 173-340 WAC. The FCAP is issued after having completed the public comment period for the Draft Cleanup Action Plan (DCAP), and after review and consideration of the comments received.

The Hamilton Street Bridge Site was once the location of the Spokane Manufactured Gas Plant (SGP) and the American Tar Company (ATC). The SGP used a coal gasification process to manufacture gas between 1905 and 1940. The ATC processed coal tar, a by-product of the SGP operation from the 1930s until 1967; shipping coal tar from Seattle after the SGP was shut down in 1940. Disposal practices at the SGP and ATC have resulted in the contamination of soil and ground water at the Site.

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the proposed cleanup action, present a threat to human health and the environment.

The major components of the cleanup action include:

- Covering and bringing to grade the ATC area with clean soil or gravel;
- Use of existing fill materials as a barrier or cover for the contaminated soils in the SGP area;
- Stormwater management that includes abandonment of existing dry wells on Site;
- Construction of a streambank bioengineering along the vulnerable or impacted shoreline of the Spokane River;
- Ground water monitoring;
- Institutional controls that includes a Restrictive Covenant on the properties;
- Five-year reviews.

Ecology has determined that this selected remedy is protective of human health and the environment, and is permanent to the maximum extent practicable.

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## 1.0 INTRODUCTION

### 1.1 THE CLEANUP PROCESS AND THE FINAL CLEANUP ACTION PLAN

The Final Cleanup Action Plan (FCAP) is one of a series of documents used by Ecology to monitor the progress of site investigation and cleanup. Figure 1 identifies the documents required under the Model Toxics Control Act (MTCA) Cleanup Regulation, Chapter 173-340 WAC.

The Remedial Investigation (RI) Report presents results of investigations into the nature and extent of contamination. The Feasibility Study (FS) Report assesses the risk posed by the contamination, and evaluates cleanup actions that eliminate, reduce or control these risks. Evaluations of cleanup actions in the FS are done in accordance with MTCA requirements. The RI and FS are conducted in accordance with work plans approved by Ecology. These Reports are made available for public review and comment.

The selection of a cleanup action by Ecology is initially presented in the Draft Cleanup Action Plan (DCAP). Upon completion of a public comment period on the DCAP, and after review and consideration of the comments received, a Final Cleanup Action Plan (FCAP) is issued.

The FCAP is incorporated into a Consent Decree or Agreed Order that provides the legal agreement for implementing the cleanup action. The remaining documents implement the selected cleanup action.

### 1.2 PURPOSE AND OBJECTIVES

Having completed the public comment period for the DCAP, and after review and consideration of the comments received, Ecology is issuing this FCAP. This decision document presents Ecology's final selected cleanup action for the Hamilton Street Bridge Site (the Site). This Site is located at 111 North Eric Street in Spokane, Washington (as shown in Figures 2 and 3). The selected cleanup action is primarily based upon the following documents:

- Focused Remedial Investigation Report SR 290 Southriver Drive Alignment, EMCON, August 28, 1998;
- Focused Site Assessment Former American Tar Company Site, Spokane, WA, Geoengineers, April 30, 1999;
- Supplemental Investigation Former Spokane Manufactured Gas Plant, Spokane, WA, Landau Associates, January 7, 1999;
- Second Supplemental and Remedial Investigation, Hamilton Street Bridge Site, Spokane, WA, Landau Associates, Inc., February 9, 2001;



- 
- Feasibility Study Report, Hamilton Street Bridge Site, GEI Consultants, Inc., November 30, 2000;
  - The Model Toxics Control Act Cleanup Regulation, Chapter 173-340 WAC.

Portions of the FCAP and DCAP text and most of the figures are taken directly from these documents.

This FCAP includes the following:

- Brief description of the Site;
- The nature and extent of contamination at the Site;
- The cleanup standards for the Site;
- A description of the proposed remedial alternatives or actions presented in the FS Report;
- Evaluation of proposed alternatives; and
- Ecology's selected cleanup action.

### 1.3 DECLARATION

Ecology's selected remedy is protective of human health and the environment. Furthermore, the selected site-specific remedy is permanent to the maximum extent practicable and is therefore consistent with the preference for permanence of the State of Washington as stated in RCW 70.105D.030(1)(b).

### 1.4 APPLICABILITY

This Cleanup Action Plan is applicable only to the Hamilton Street Bridge Site. Cleanup standards and cleanup actions have been developed as an overall remediation process being conducted under Ecology oversight using MTCA authority, and should not be considered as setting precedents for other sites.

### 1.5 ADMINISTRATIVE RECORD

The documents used to make the decisions discussed in this cleanup action plan are constituents of the administrative record for the site. These documents are listed in the Reference Section.

The entire administrative record for the site is available for public review by appointment at Ecology's Eastern Regional Office, 4601 N. Monroe, Spokane, WA 99205-1295. Documents

that were made available for public comment and review are also available at the Spokane Public Library, 906 West Main Avenue, Spokane, WA.

## 2.0 SITE BACKGROUND

### 2.1 SITE DESCRIPTION

The Site is located at North 111 Erie Street, Spokane, Washington (Figure 2). It is currently where the Brown Building Materials salvage and sales operation is located and is situated beneath the Hamilton Street James E. Keefe Bridge along the Spokane River. It includes properties now owned by the Spokane River Properties (SRP) and Burlington Northern Santa Fe (BNSF) which were once associated with the former Spokane Manufactured Gas Plant (SGP), the American Tar Company (ATC), and the Chicago Milwaukee & Saint Paul Railroad (CM&SPR) (see Figure 3).

### 2.2 SITE HISTORY

SGP produced coal gas and carbureted water gas at the property between 1905 and 1948. From 1948 to approximately 1956, a propane-air system was operated from the facility for gas mixing, storage, and distribution. The propane-air system was utilized until natural gas was available, and to reflect the change from coal gas manufacturing to natural gas distribution, the company changed its name to Spokane Natural Gas Company in 1956. In 1958, Washington Water Power (WWP), now Avista Corporation, merged with the Spokane Natural Gas Company and dispensed natural gas from the Site until 1962 or 1963. In 1963, Mr. Richard Brown leased the SGP property from WWP and established Brown Building Materials. Mr. Brown purchased the property in 1978 and conveyed the property to SRP in 1982, of which he is a general partner.

During the operation of the manufactured gas plant, coal tar, a by-product of coal gas production was conveyed to a coal tar processing plant and distribution facility located on a parcel leased from the Northern Pacific Railroad (contemporary BNSF) adjacent to the south side of the former SGP property. The C.G. Betts Company operated the facility until the early 1930s when the operations were taken over by the ATC. The ATC utilized the facility until the early 1967, shipping tar to the Site from Seattle after the SGP was shut down. Mr. Brown began leasing the ATC property from the BNSF in 1968 and continues to lease the property today.

CM&SPR formerly owned the existing riverfront property west of the SGP property and north of the BNSF land. Mr. Brown purchased this property in 1981, and the title is now held by SRP.

### 2.3 SITE INVESTIGATIONS

In 1987, the U.S. Environmental Protection Agency (EPA) completed a preliminary assessment of both the SGP and the ATC properties and recommended additional investigations for the ATC property. In 1988 EPA conducted a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) screening site investigation of the ATC property.

In 1981, the Washington State Department of Transportation (DOT) conducted drilling on and around the former SPG and ATC properties to provide design information for the James Keefe Bridge. Contamination was observed at depth in several of the borings and was observed during the bridge construction in 1982.

In 1995, EPA conducted a screening site investigation of the SGP that included sampling and chemical testing of surface water and sediment from the Spokane River. EPA concluded that the samples did not reflect a release of contamination from the Site to the Spokane River. Consequently, EPA did not anticipate further investigation under CERCLA, and referred the Site to the state for further consideration.

DOT conducted further exploratory activities on the Site in 1997 as part of a proposed highway realignment of Trent Avenue. Their study showed the presence of coal-tar waste covering an area of two to three acres and extending below ground surface to a depth in excess of 40 feet. The most heavily impacted soil was reportedly observed in the central portion of the SGP operation areas and near the refining process areas of the ATC property. No coal tar constituents were detected in the nearest city water supply well, the Nevada Street well, located approximately 8,500 feet north-northeast from the Site.

A health consultation prepared for the Washington State Department of Health (DOH) under a cooperative agreement with the U.S. Department of Health and Human Services, Agency for Toxic Substances and Disease Registry (ATSDR) in 1998 stated that no apparent public health hazards exist based on current land and ground water use, but identified the need for further study should Site or local ground water use change. The Spokane County Health District (SCHD) completed a MTCA site hazard assessment of the former SGP property in 1998 and assigned the property a hazard ranking of 3.

Avista Corporation conducted further investigations in 1997 and 1998 to evaluate the effect of the soil contamination on ground water and to determine whether site contaminants had migrated to the Spokane River. The results of these studies further defined the lateral boundaries of the soil contamination identified in the DOT study. These studies also showed that soil contamination does not adversely affect ground water outside the limits of soil contamination. Data from this investigation indicated that during the period of observation, ground water flow appeared to be from the Spokane River toward the Site.

A supplemental site investigation was conducted by Avista Corporation in 1998 to evaluate the vertical extent of contamination, ground water quality and hydraulic gradients in the vicinity of the Site, and to characterize the nonaqueous phase liquid (NAPL) found in the soil contaminated area. The results further defined the lateral and vertical boundaries of the soil contamination at the Site. NAPL was encountered in soil during drilling up to 80 feet below ground surface. The ground water outside of the area of soil contamination showed sporadic detectable levels of chemicals associated with the gas plant operations or coal tar processing

A focused site investigation was conducted by BNSF on the ATC property in 1999 to collect soil and ground water data. Soil samples showed contamination in the ATC area. Ground water samples collected from monitoring wells in the property did not detect the presence of constituents above cleanup levels.

Ecology has combined the Spokane Manufactured Gas Plant and the American Tar Company sites into one referred to as the Hamilton Street Bridge Site with a ranking of three (3) under MTCA.

Avista and BNSF conducted a second supplemental investigation and completed a Remedial Investigation and Feasibility Study under a MTCA Agreed Order in 1999. This supplemental study evaluated the vertical extent of contamination, ground water quality, and hydraulic gradient. Findings of the study, in conjunction with the other previous site investigations, were used to determine the nature and extent of contamination. The Feasibility Study evaluated remedial technologies applicable to the Site.

## 2.4 PHYSICAL SITE CHARACTERISTICS

### 2.4.1 Site Condition and Geology

Geologic units encountered at the Site include, youngest to oldest, recent surficial fill materials (including cinder, brick, soil, and basalt cobbles and boulders), unconsolidated sediment, and basalt bedrock.

During the early 1900s, substantial quantities of fill materials were placed in the river for the construction of the CM&SPR. Limited quantities of fill have also been placed across the Site surface at the time. Placement of the fill shifted the riverbank as much as 230 feet north as shown on Figure 3. Fill materials range from 2.5 feet up to approximately 30 feet in thickness, and are thickest on the western portion of the Site and near the river.

The unconsolidated sediments on the Site consist primarily of Spokane River deposits of silt, sand, gravel, and cobbles, and glaciofluvial sediments deposited by the Pleistocene catastrophic floods. The sand, gravel, and cobbles deposited by the Spokane River are undifferentiated from the glaciofluvial deposits. The glaciofluvial deposits consist primarily of sand, gravel, cobbles, and boulders, with some silt. The unconsolidated sediments in the central area of the Site are over 115 feet thick. Bedrock underlying the unconsolidated sediments on Site has only been encountered at a depth of 90 feet BGS in one location but has not been encountered in other locations.

Basalt bedrock outcrops along the western edge of the Site. The basalt forms a cliff face comprising the western boundary of the Site and diverts the Spokane River to the north.

Figures 5 and 6 show two north-south geologic cross sections of the Site for locations shown in Figure 4.

# Construction Record Drawings



Engineering • Land Surveying  
Planning • Materials Testing

Date	9/29/2005	USKH W.O.
Rev	12/09/2005	B77800
Scale	1" = 50'	CAD File
Dwn	08/24/05	Checked
Dwg	08/24/05	Checked



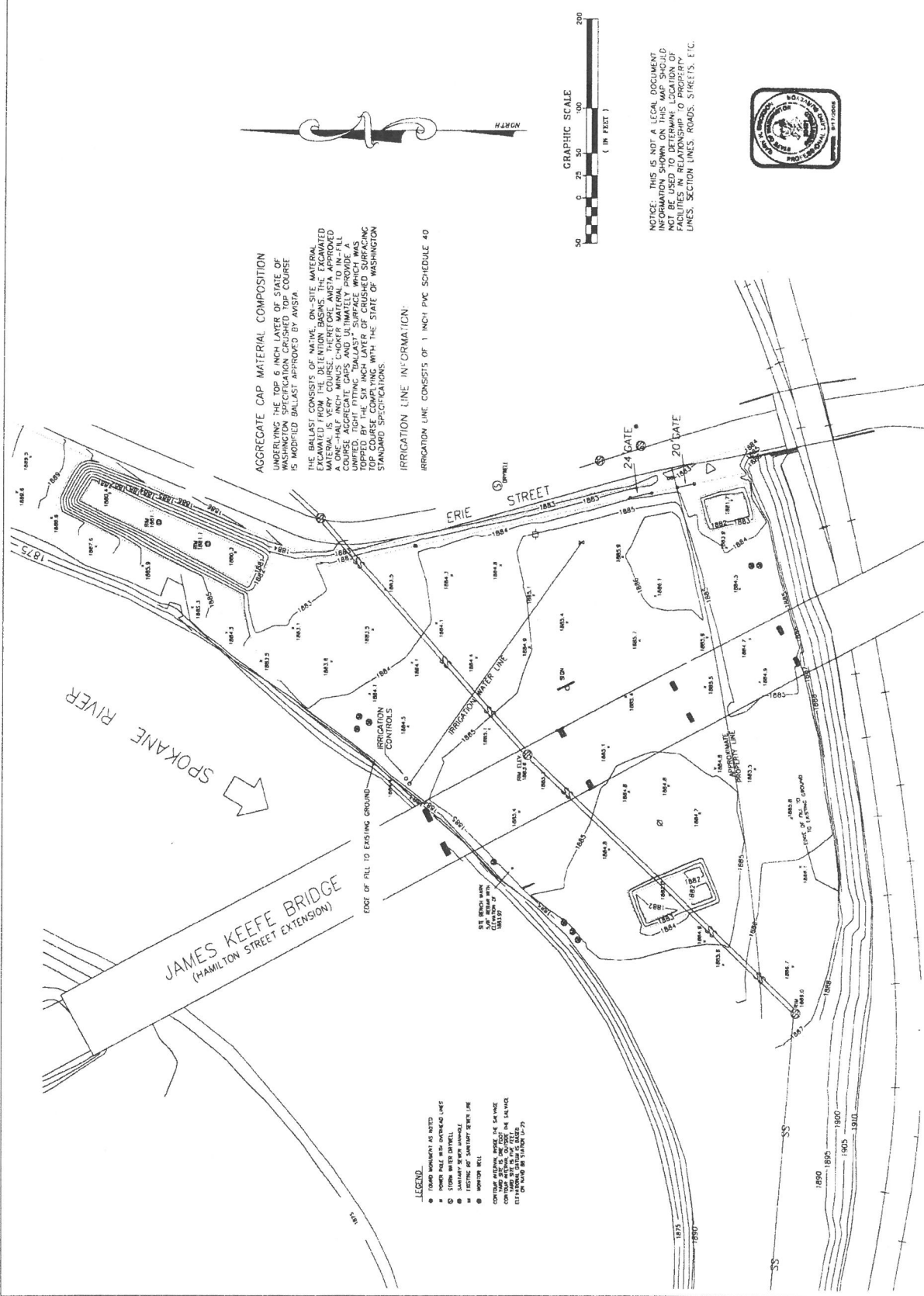
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LINES, SECTION LINES, ROADS, STREETS, ETC.



**AGGREGATE CAP MATERIAL COMPOSITION**  
UNDERLYING THE TOP 6 INCH LAYER OF STATE OF WASHINGTON SPECIFICATION CRUSHED TOP COURSE IS MODIFIED BALLAST APPROVED BY AMSTA.

THE BALLAST CONSISTS OF NATIVE, ON-SITE MATERIAL EXCAVATED FROM THE DETENTION BASINS. THE EXCAVATED MATERIAL IS VERY COURSE, THEREFORE AMSTA APPROVED MATERIAL WITH A Mixture Ratio OF 80% CRUSHED TOP COURSE AGGREGATE GAPS AND ULTIMATELY PROVIDE A UNIFIED, TIGHT FITTING "BALLAST" SURFACE WHICH WAS VERIFIED BY A FIELD TEST AND A LABORATORY TEST. ALL TOP COURSE COMPLYING WITH THE STATE OF WASHINGTON STANDARD SPECIFICATIONS.

**IRRIGATION LINE INFORMATION:**  
IRRIGATION LINE CONSISTS OF 1 INCH PVC SCHEDULE 40



**LEGEND**

- FOUND MONUMENT AS NOTED
- FOUND HOLE WITH COVERED LINES
- FOUND HOLE WITH UNCOVERED LINES
- SCHEDULED SAND PIT
- SCHEDULED SAND PIT
- EXISTING OR SANITARY SEWER LINE
- IRRIGATION WATER LINE
- IRRIGATION WELL

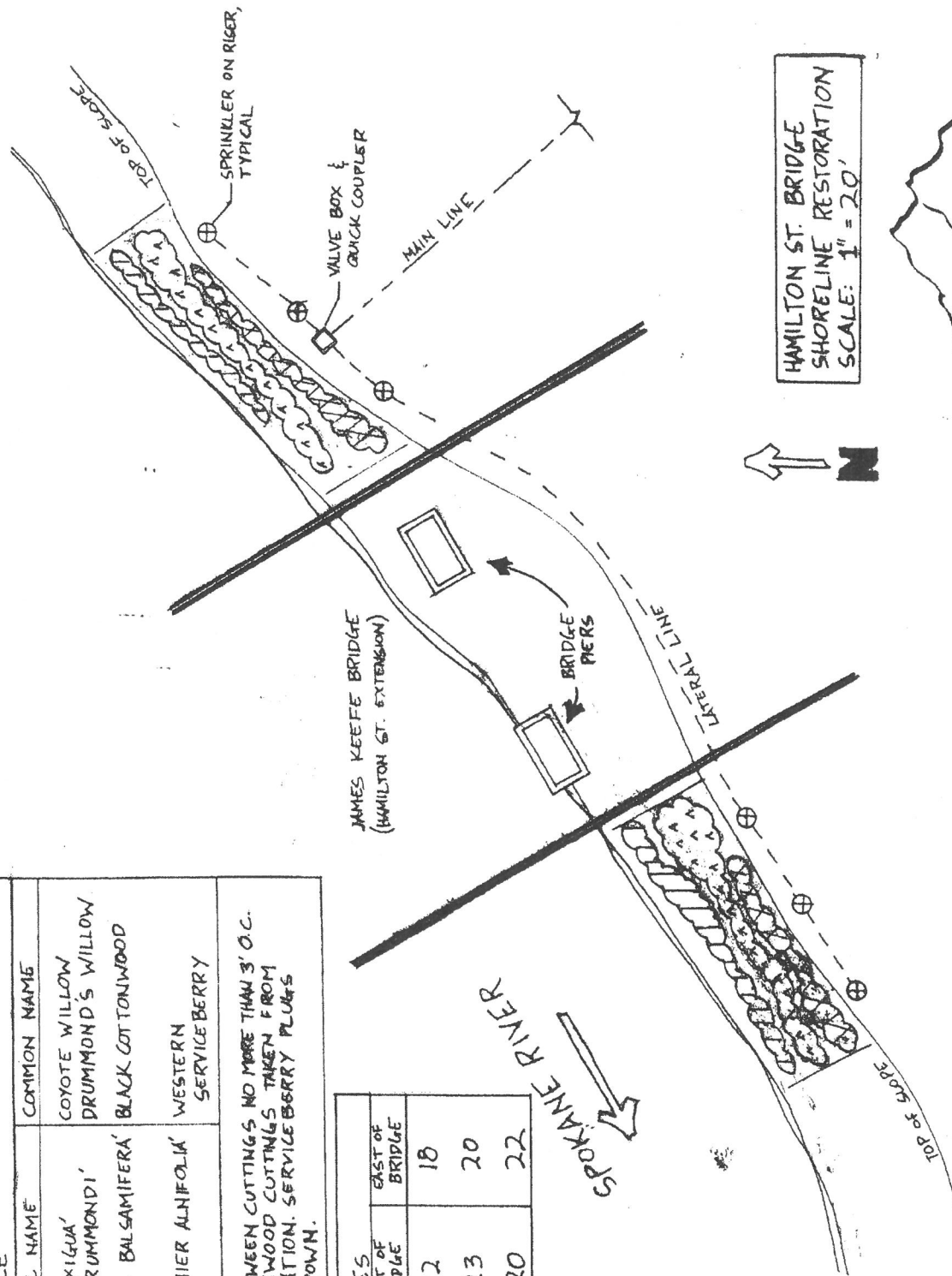
CONTINUE AROUND ABOVE THE BRIDGE  
CONTINUE AROUND ABOVE THE BRIDGE  
CONTINUE AROUND ABOVE THE BRIDGE  
CONTINUE AROUND ABOVE THE BRIDGE  
CONTINUE AROUND ABOVE THE BRIDGE

PLANT SCHEDULE

SYMBOL	SCIENTIFIC NAME	COMMON NAME
	'SALIX EXIGUA' 'SALIX DRUMMONDI'	COYOTE WILLOW DRUMMOND'S WILLOW
	'POPULUS BALSAMIFERA'	BLACK COTTONWOOD
	'AMELANCHIER ALNIFOLIA'	WESTERN SERVICEBERRY

\*NOTE: SPACING BETWEEN CUTTINGS NO MORE THAN 3' O.C. WILLOW & COTTONWOOD CUTTINGS TAKEN FROM ADJACENT VEGETATION. SERVICEBERRY PLUGS ARE NURSERY GROWN.

PLANT QUANTITIES	EAST OF BRIDGE	
	WEST OF BRIDGE	EAST OF BRIDGE
WILLOW	22	18
COTTONWOOD	23	20
SERVICEBERRY	20	22



HAMILTON ST. BRIDGE  
SHORELINE RESTORATION  
SCALE: 1" = 20'



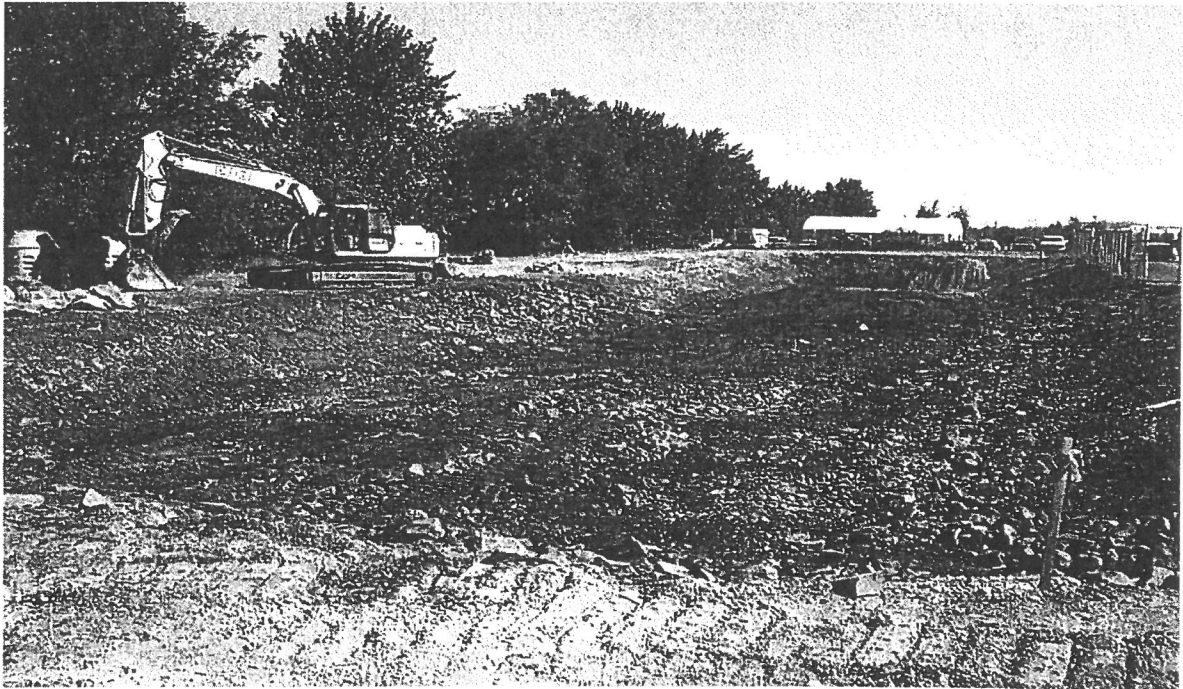
(509) 482-2722  
PREPARED BY: BRENDAN BEMIS  
DATE: 11/14/05



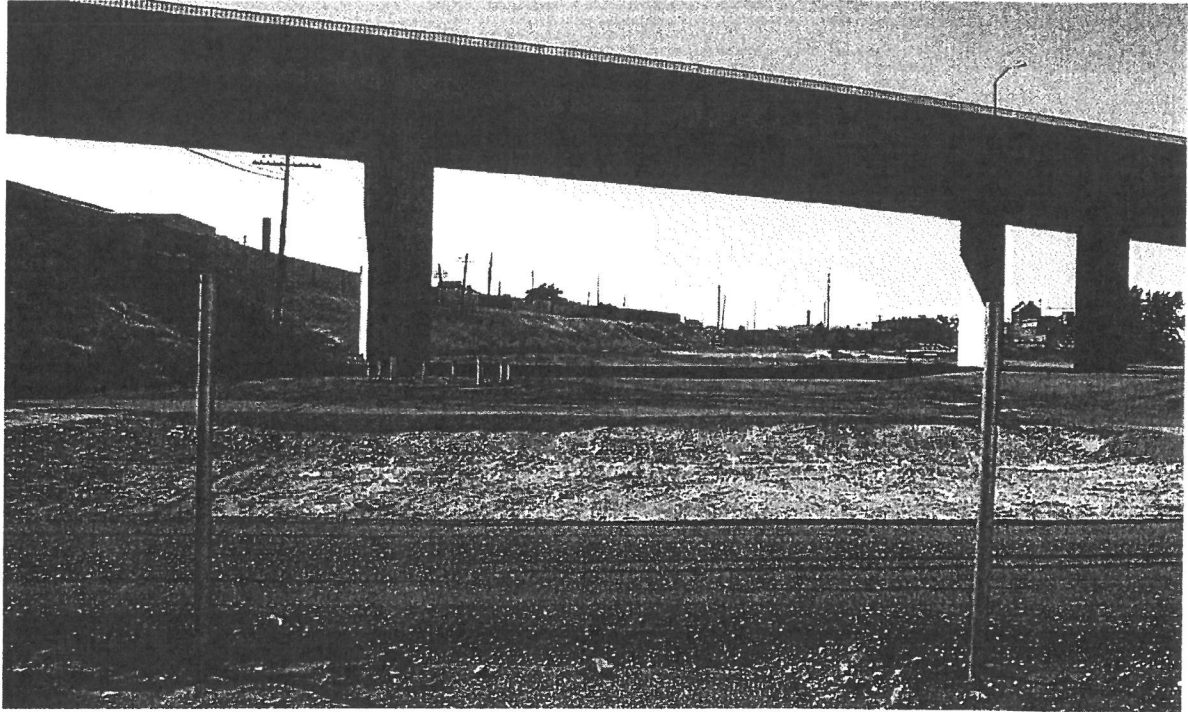
## **Selected Construction Photographs**



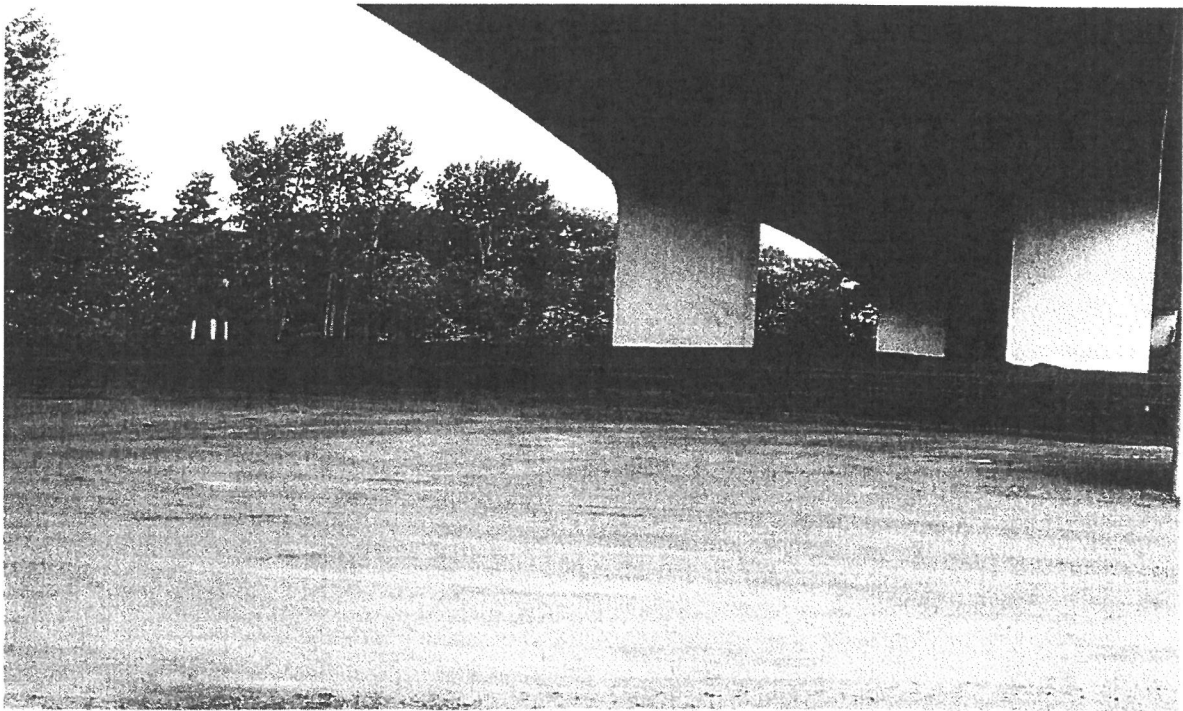
View of west detention basin (looking northwest).



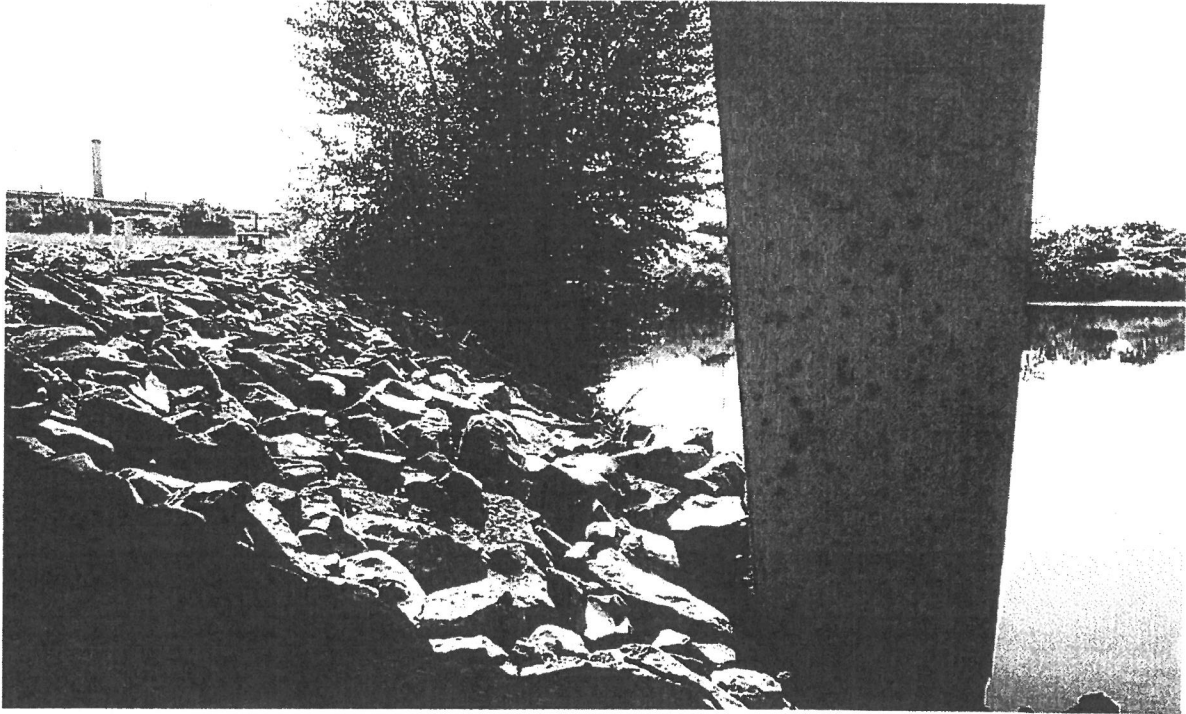
View of north detention basin (looking north)



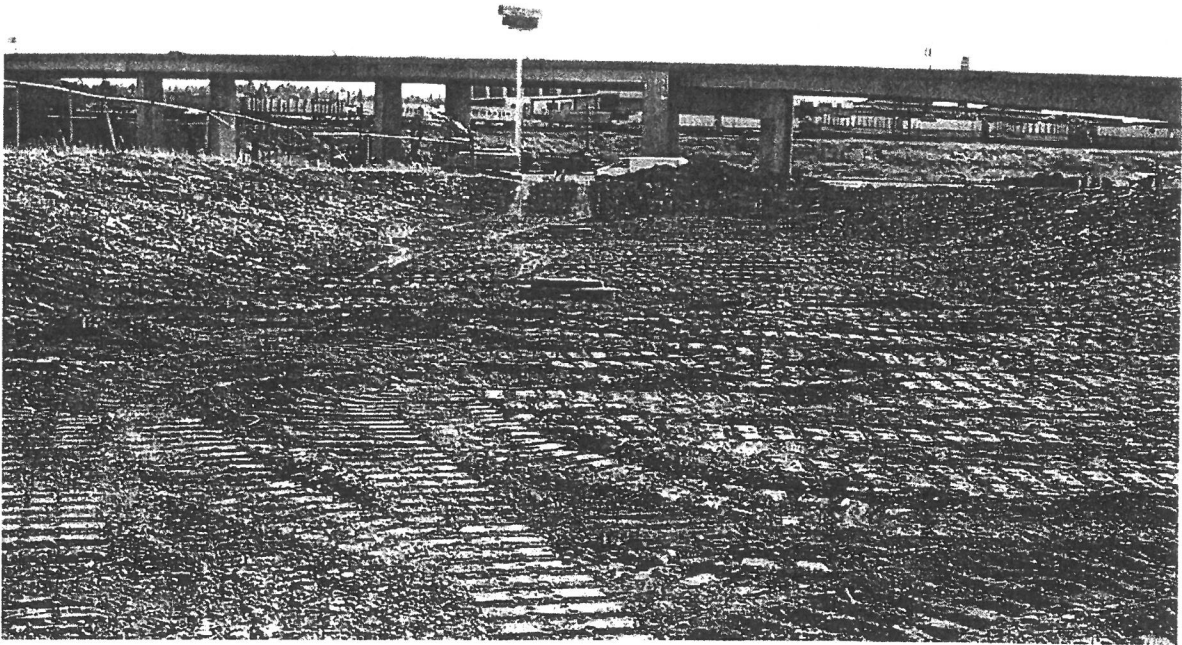
View of southeast detention basin and top course (looking west from Erie Street).



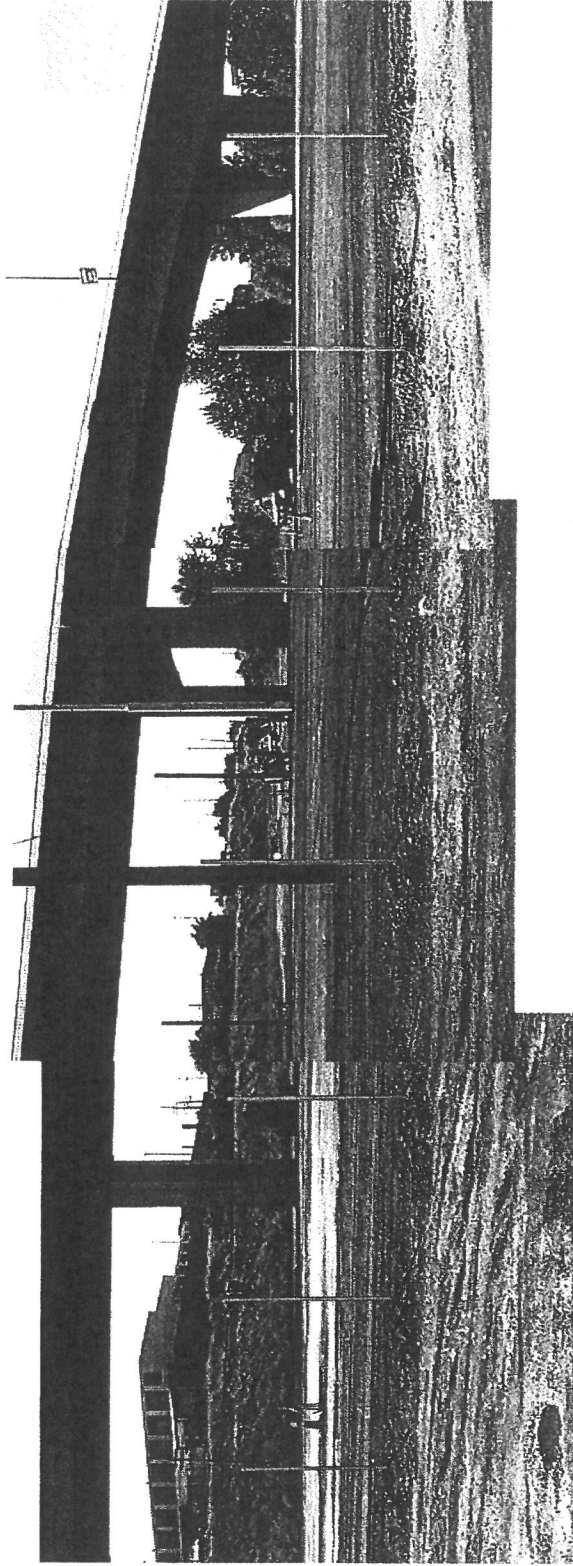
View of top course (looking north-northwest from under bridge).



View of new riprap on stabilized river bank (looking west under bridge).



View of north detention basin and new dry wells (looking south).



View of re-graded site looking west from Erie Street



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

January 13, 2006



Mr. Hank Nelson  
Avista Corporation  
1411 E. Mission  
P.O. Box 3727  
Spokane, WA 99220-3727

Dear Hank:

RE: Hamilton Street Bridge Site  
Ecology's Review of Draft Cleanup Action Completion Report

Ecology has completed review of the draft Cleanup Action Completion Report dated December 22, 2005, prepared by Landau Associates on behalf of Avista Corporation and the Burlington Northern Santa Fe Railway Company for the Hamilton Street Bridge Site. Our review shows that this draft report included all the major tasks identified in the January 8, 2004 Construction Plans and Specifications Report for the Site. Ecology notes that discussions regarding the removal of the concrete pad and asphalt pavement, and the removal and installation of new fences are not mentioned in the report. Although these are minor tasks, we suggest including such discussions in the report.

Please submit a revised report, addressing our minor comment above, in accordance with the schedule in the Consent Decree. If you have any questions or if you would like to discuss your proposed changes prior to preparation of a revised report, please call me at 509/329-3543 or contact me via e-mail at [tba1461@ecy.wa.gov](mailto:tba1461@ecy.wa.gov).

Sincerely,

*Teresita F. Bala*  
Teresita F. Bala  
Toxics Cleanup Program

cc: Bruce Sheppard, BNSF

