

"THE RANCH" PUBLIC WORKS STORAGE YARD
SPOKANE, WASHINGTON
DRAFT PHASE I ENVIRONMENTAL SITE
ASSESSMENT



Prepared for
CITY OF SPOKANE
SPOKANE, WASHINGTON
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Project No. 0794.03.01

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EXECUTIVE SUMMARY

This summary contains the findings and opinions of the environmental site assessment (ESA) and is intended for use with the supporting text, figures, and attachments of the complete report.

At the request of the City of Spokane, Maul Foster & Alongi, Inc. (MFA) conducted this Phase I ESA of the site at “The Ranch” Public Works Storage Yard, in Spokane, Washington (the Property).

This Phase I ESA was conducted in accordance with the requirements of the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-13). The Phase I ESA also was prepared to support the Bona Fide Prospective Purchaser defense (Comprehensive Environmental Response, Compensation and Liability Act [CERCLA] § 101(4)) and the innocent purchaser defense (CERCLA § 101(35)(A)(i)). This Phase I ESA generally complies with 40 Code of Federal Regulations Part 312, adopted by the U.S. Environmental Protection Agency on November 5, 2005, and effective November 1, 2006. These rules identify the standards and practices for all appropriate inquiries under CERCLA § 101(35)(B). The purpose of the Phase I ESA was to identify, to the extent reasonably feasible, “recognized environmental conditions” (RECs).

RECOGNIZED ENVIRONMENTAL CONDITIONS

ASTM E1527-13 defines RECs as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

The RECs identified on the Property are not likely to pose significant challenges to redevelopment. Groundwater is at a depth of over 100 feet below ground surface (bgs) and it's likely that if there are any impacts that to the Property, they are localized. RECs were identified for the Property, including the following:

Drainage Pit at North End of Property. A small partially vegetated pit located on the northernmost boundary of the Property collects runoff through two drainage channels on the south side of the pit. Bulk storage of asphalt along with organic and miscellaneous debris collected from public thoroughfares is stored in close proximity to the pit. Runoff from the material piles flows directly into the pit. Stormwater is not managed on the Property and all stormwater either infiltrates into the unpaved ground surface or moves across the Property as runoff. As a result, it's possible that the localized accumulation of petroleum products due to stormwater runoff from the bulk asphalt storage area near the pit may have impacted soils in the center of the pit. MFA recommends that one surface soil sample be collected within each of the two lowest areas of the drainage pit to confirm whether asphalt-related petroleum impacts are present.

Asphalt Storage-Related Surface Soil Staining. Asphalt used for road maintenance and construction is stored on the Property in bulk quantities. The asphalt is stored in direct contact with the unpaved gravel ground surface and staining is present across most of the northern portion of the

Property. As asphalt is a petroleum-based substance it is likely that petroleum impacts are present in the surrounding near-surface soil within the asphalt storage area. While it's likely that these impacts are minor in nature, MFA recommends that up to three test pits be dug to determine the depth of asphalt-related petroleum impacts bgs and up to three soil samples be collected to determine the extent to which petroleum impacts are present on the Property.

2007 Deicer Spill. On Saturday, June 2, 2007, a spill of deicer containing a mixture of magnesium chloride and water spilled on the Property. Photos and correspondence of the spill were provided by the City of Spokane. According to an e-mail sent from Shane Thornton, the street supervisor for the City of Spokane at the time, approximately 40,000 gallons of deicer was spilled out of a 50,000-gallon deicer aboveground storage tanks (ASTs). Approximately 20,000 gallons of deicer was removed from the Property through pumping into storage tanks. Approximately 2,000 gallons of deicer was removed in the AST containment area of the deicer ASTs and deposited in a sand pile in Building A. The remaining impacts in the containment area (approximately 5,000 gallons of deicer) was diluted with water while being used as a dust palliative on the Property. Due to the force of explosion from the AST, deicer flooded over the containment area perimeter and impacted the surrounding ground surface. The city was able to dig through the impacted ground surface and observed approximately 2 inches of subsurface impacts. Deicer was also observed in the adjacent dirt-shouldered paved street (N Florida Street). Sand was placed on the pavement and areas with visible deicer impacts present and later removed and returned to the sand pile in Building A. Two dry wells, located on the northwest and southwest corners of the Property, were flushed with water and pumped dry to remove any deicer that may have accumulated. Approximately 13,000 gallons of deicer was not recovered at the Property. In reviewing the chemical composition of the deicer it is unlikely that there is a significant impact to the surface and/or subsurface at the Property, if at all. However, MFA recommends that a surface soil sample be collected in each of the two contained AST areas in order to confirm the presence/absence of impacts to the Property.

Dry Wells. The site assessment report for the underground storage tank (UST) removal at the Property in 1993, indicated the presence of a “dry well outside the shop area and a sump, containing about six inches of sludge, inside the shop” (see Roar Tech Inc. report in Appendix B). Given the noted historical uses of the building, runoff from operations at the street department facility may have accumulated in these features. The contents of “the sludge” were not discussed further in the report and any impacts related to the dry well and/or sump are not known to have been further investigated. Additionally, two dry wells located on the northwest and southwest corners of the Property were noted in the correspondence of the 2007 deicer spill. The exact location of these two dry wells on the Property is unknown. It is unclear if the two dry wells mentioned include the dry well described in the UST Site Assessment report from 1993 or if these are additional dry wells on the Property. MFA did not observe the location or the condition of the dry wells and sump on the Property and it's unclear as to whether the dry well and sump are still present on the Property. MFA recommends that additional investigation be conducted to determine whether the dry wells and sump are currently present on the Property. If the dry wells and sump are present, MFA recommends that the dry wells be evaluated for potential impacts related to historical shop operations. The dry wells should also be registered and decommissioned according to the Washington State Department of Ecology's (Ecology) Underground Injection Control program.

Former Storage Area for Polychlorinated Biphenyl (PCB)-Containing Transformers. Mr. Werner indicated that PCB-containing transformers were previously stored on the Property to the east of Building C and were in contact with the unpaved ground surface. The number of PCB-containing transformers that were stored on the Property and the duration of that storage are unknown. MFA did not observe any staining in the former storage area and believes it's unlikely that significant impacts to the Property exist. However, MFA recommends that a single surface soil sample be collected in the former storage area in order to confirm the presence/absence of PCB impacts to the Property.

HISTORICAL RECOGNIZED ENVIRONMENTAL CONDITIONS

ASTM E1527-13 defines historical RECs (HRECs) as a past release of any hazardous substances or petroleum products that has occurred in connection with the Property and that has been addressed to the satisfaction of the applicable regulatory authority, or meets unrestricted use criteria established by a regulatory authority, without the Property being subjected to any required controls. The following two HRECs were identified on the Property:

1993 Leaking UST (LUST) Notification and Report. Three USTs were decommissioned at the Property in 1993 (see Appendix B). During the decommissioning event, diesel impacts in soil were observed above the Model Toxics Control Act Method A cleanup levels around one of the removed USTs. Impacted soils above cleanup levels were removed from the Property and confirmation samples were collected from the bottom of the excavation. A No Further Action determination was given to the Property regarding the petroleum impacts identified during the 1993 UST decommissioning event. In MFA's opinion, the information reviewed for the LUST notification and report indicates that the tank removal and soil cleanup meet unrestricted land use criteria established by Ecology.

CONTROLLED RECOGNIZED ENVIRONMENTAL CONDITIONS

ASTM E1527-13 defines controlled RECs (CRECs) as resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority. No CRECs were identified on the Property.

DE MINIMIS CONDITIONS

De minimis conditions were identified on the Property and include the following:

ASTs containing deicer fluid. Eleven 5,000-gallon ASTs containing deicer fluid are located on the south end of the Property. All eleven active ASTs have a secondary containment system involving a plastic liner covering the surrounding ground surface that is covered with a fine sand to silt mixture. A coarse gravel berm makes up the perimeter of the AST containment area. This containment system is used to prevent migration of any spilled deicer fluid into the surrounding subsurface.

Pole-Mounted Transformers. Six pole-mounted transformers were observed on the periphery of the Property boundary; three along the east side and three along the west side. No signs noting the presence of PCBs or staining were observed.

DATA GAPS

Access Limitations. MFA did not observe the interiors of four buildings and the pump house during the site walk. The representative of the Property owner, Mike Werner, described the interiors of the buildings including their current use and contents. Based on Mr. Werner's ability to give details on the interiors of the structures, this data gap is not considered significant and is not expected to impact the conclusions and recommendations of this report.

Location of Dry Wells. MFA was unable to determine the exact location of the dry wells and sump mentioned at the Property in the UST Site Assessment report by Roar Tech Inc. and the 2007 deicer spill correspondence. Until the location and the condition of the dry wells and the sump can be observed, the extent of any impacts related to their current or former operation are unknown.

Former Storage Area for PCB-Containing Transformers. MFA was unable to determine the number of PCB-containing transformers or the duration of storage of the transformers to the east of Building C. In order to identify the presence/absence of PCB impacts to the former storage area, MFA recommends the collection of a near-surface soil sample.

CONCLUSIONS

MFA has conducted a Phase I ESA, in conformance with the scope and limitations of ASTM Practice E1527-13, of "The Ranch" Public Works Storage Yard. Any exceptions to, or deviations from, this practice are described in Section 1 of the report.

The Phase I ESA revealed evidence of RECs in connection with the Property, including the following:

- Drainage pit at northern end of Property
- Asphalt storage-related surface soil staining
- 2007 deicer spill
- Dry wells
- Former storage area for PCB-containing transformers