

**Analysis of Brownfield
Cleanup Alternatives (ABCA)
for Riverfront Park, Target Area
A, Havermale Island**

Riverfront Park Redevelopment
Project
Riverfront Park
Target Area A, Havermale Island,
Spokane, Washington



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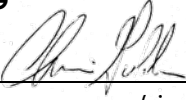
April 24, 2018

Sign-off Sheet

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Abbreviations

ABCA	Analysis of Brownfield Cleanup Alternatives
bgs	Below ground surface
City	City of Spokane
COC	Constituent of Concern
cPAH	Carcinogenic Polycyclic Aromatic Hydrocarbons
CY	Cubic yards
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
HAZWOPER	Hazardous Waste Operations and Emergency Response
Mg/kg	Milligrams per kilogram
MTCA	Model Toxics Control Act
Parks Department	City of Spokane's Parks and Recreation Department
PAH	Polycyclic Aromatic Hydrocarbons
Pavilion	US Pavilion Event Center
REC	Recognized environmental conditions
RCRA	Resource Conservation and Recovery Act
WAC	Washington Administrative Code

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA) FOR RIVERFRONT PARK, TARGET AREA A, HAVERMALE ISLAND

Introduction and history
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1.0 INTRODUCTION AND HISTORY

Riverfront Park is located at 610 West Spokane Falls Boulevard in the heart of Spokane, Washington and occupies approximately 100 acres of land and water with a rich and varied history. Spokane Falls and the surrounding land has long been a gathering place for people. Native Americans gathered and fished at the falls and in the late 1800's, pioneers settled here and started the City of Spokane then known as Spokane Falls. The railroad industry fueled the city's growth in the late 19th and early 20th centuries and rail yards covered Havermale Island, the present site of Riverfront Park.

With the steady decline of the railroad in the 1950s, the area around Havermale Island began to degrade and the City struggled with the challenge of how to revitalize the area. The City's response was to host Exposition '74 (Expo '74), "The World's Fair." In preparation for Expo '74, the rail yards were removed and the Great Northern Railroad Depot on Havermale Island was demolished. Massive amounts of fill were brought in to cover the historically industrial area. The Clock tower is the only vestige of the once famous 1902 Great Northern Depot.

Now, over 40 years after its creation following Expo '74, an extensive revitalization and rehabilitation effort being led by the City of Spokane's Parks and Recreation Department (Parks Department) is underway to bring new life to this local landmark. Because of the former industrial uses of the area now comprising much of the Park, contaminated soil has been encountered during the revitalization projects.

In May of 2017, the City of Spokane (City) was formally awarded three separate \$200,000 United States Environmental Protection Agency (EPA) grants for cleanup of petroleum and hazardous substance brownfields sites within Riverfront Park. The three grants were awarded for Canada Island, Havermale Island and the North Bank. These grants will be used to fund soil cleanup activities at the respective areas within Riverfront Park, a brownfield property.

This Analysis of Brownfield Cleanup Alternatives (ABCA) is for Target Area A, Havermale Island (Figure 1). The funding provided through this grant is to address contaminated and impacted soil on Havermale Island in conjunction with the revitalization project.



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Environmental Background
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2.0 ENVIRONMENTAL BACKGROUND

The following section provides a summary of recent investigations completed at Riverfront Park.

2.1 PHASE I ENVIRONMENTAL SITE ASSESSMENT

GeoEngineers completed a Phase I Environmental Site Assessment (ESA) in October 2014 at Riverfront Park on behalf of the City of Spokane. The Phase I ESA identified historical occupants of the Property as recognized environmental conditions (RECs), including railroads, auto service stations and various types of mills and factories to name a few. The report indicated that a large amount of fill was imported and used throughout the Park for construction of the 1974 World's Fair. The exact amount of fill is unknown. A portion of the fill was sourced from Havermale Island and area west of Monroe Street near the courthouse.

2.2 LOOFF CAROUSEL – GEOTECHNICAL AND ENGINEERING EVALUATION AND ENVIRONMENTAL SITE ASSESSMENT

In May 2016, GeoEngineers conducted a geotechnical engineering and environmental assessment to support construction a new Looft Carousel structure to replace the existing facility which had exceeded its useful life (GeoEngineers, 2016a). The investigation included the installation of eight soil borings to depths of 4 to 15 feet below ground surface (bgs) using a hollow-stem auger drill rig (Figure 2). Based on the investigation, soil beneath the asphalt pavement was observed to contain variable base material consisting of crushed rock base to fine to medium sand with variable silt content. In two borings advanced in the southeast corner of the Property, 12-inches of sandy topsoil were encountered. Beneath the pavement and topsoil, where encountered, fill extended to the maximum depths explored. The fill material consisted of loose to medium dense sand and gravel with variable silt and cobbles and debris (brick, concrete). Groundwater was encountered in four borings. At two of the locations (LC-1 & LC-4), the groundwater elevation was near that of the Spokane River (1,870.5 feet above mean sea level based on NAVD88) and at the remaining locations (LC-2 and LC-6), below the elevation of the River. GeoEngineers interpreted these data to suggest that groundwater in the project area flows from the River to the south. The analytical results revealed exceedances of lube oil petroleum hydrocarbons, polycyclic aromatic hydrocarbons (PAHs), and lead. Lube oil petroleum hydrocarbons were greater than the Model Toxics Control Act (MTCA) Method A cleanup level in



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the soil sample collected from LC-4 at 1 to 2.5 feet bgs. PAHs exceeded the MTCA Method A in samples LC-1 at 3.5 to 5 feet bgs, LC-2 at 8.5 to 9 feet bgs, and LC-4 1 to 2.5 feet bgs.

2.3 ICE RIBBON AND SKY RIDE FACILITY-GEOTECHNICAL ENGINEERING EVALUATION AND ENVIRONMENTAL SITE ASSESSMENT

In June 2016, GeoEngineers conducted a geotechnical engineering and ESA for an adjacent Riverfront Park parcel to the southwest of Havermale, (GeoEngineers 2016b, Figure 1). The purpose of the investigation was to characterize soil prior to the planned construction of an Ice Rink and SkyRide Facility and to identify potential contaminants. Because this adjacent parcel is proximate to the Property and generally had the same historically uses it is included in this discussion because soil conditions on the Property are likely to be similar in nature. The scope of work included the advancement of 16 hollow-stem auger borings and the collection of soil samples for both geotechnical and chemical laboratory testing. During this investigation groundwater was encountered in only two of the borings, B-5 and B-17 at depths of approximately 6 feet bgs. Groundwater was not encountered consistently across the site due to the proximity of the Spokane River and varying depths to bedrock. Because groundwater is not expected to be encountered it will not need to be managed during construction activities.

Based on the investigation, an upper layer of organic topsoil is underlain by 5 to 10 inches of fill soil consisting of loose to medium dense sand and gravel with variable silt and cobble content. The analytical results indicate that soil samples from borings B-5, B-7, B-9, B-11, B-13, B-14, and B-18 contain carcinogenic polycyclic aromatic hydrocarbons (cPAHs) at concentrations greater than the MTCA Method A Unrestricted Land Use cleanup level. Lead was detected in borings B-13 and B-18 at concentrations greater than the MTCA Method A cleanup level. In addition, cadmium and chromium concentrations exceeded the MTCA Method A cleanup level in boring B-13. Soil from other locations was collected for geotechnical characterization and not submitted for chemical analysis. Lube-oil range petroleum hydrocarbons were also detected in one soil sample from B-13 at a concentration greater than the MTCA Method A Unrestricted Land Use cleanup level. The measured concentrations are generally below the cleanup standards that would apply to the site if still in use as a railroad facility. Therefore, the need for environmental cleanup is driven primarily by the ingestion exposure pathway and the change in land use by the City from industrial to recreational. Other anticipated environmental cleanup costs are associated with the need to



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applicable regulations and cleanup standard
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manage contaminated materials that will be excavated for construction purposes. Although some of the contaminants at the site are consistent with those frequently encountered on properties in use by railroad operations, the contaminants are also consistent with those occurring in urban areas subject to filling in the 1800s. In addition, the railroad tracks were located on an elevated platform. Therefore, it is uncertain whether any of the contamination present at the site can be directly linked to activities by the former owners. Regardless, anticipated cleanup costs are the result of the need to manage contaminated soil for the purpose of redevelopment as well as the conversion in land use that occurred following acquisition by the City (from industrial to recreational).

2.4 PHASE II SITE ASSESSMENT REPORT - CANADA ISLAND, THEME STREAM, CENTRAL PROMENADE, HAVERMALE ISLAND AND THE NORTH BANK AREA

In June 2016, GeoEngineers conducted a Phase II ESA in five areas of the Park; Canada Island, Theme Stream, South Bank, Central Green, Havermale Island and the North Bank area (GeoEngineers, 2016c). The purpose of the investigation was to characterize soil within these redevelopment areas in order to identify potential contaminants. The scope of work included the advancement of 40 direct-push soil borings and the collection of soil samples for chemical laboratory testing. 15 of the soil borings, DP-26 through DP-40 were advanced on Havermale Island to depths between 2.5 and 15 feet bgs. The analytical results indicate that soil on Havermale Island contains cadmium, lead, PAHs and lube-oil range petroleum hydrocarbons at concentrations greater than the MTCA Method A Unrestricted Land Use cleanup level. Other anticipated environmental cleanup costs are associated with the need to manage contaminated soil that will be excavated for construction purposes. GeoEngineers concluded that in their opinion the subsurface conditions across the Site should be considered impacted and/or contaminated with constituents of concern (COCs). Metals concentrations greater than the background concentrations have been used to characterize soil as impacted.

3.0 APPLICABLE REGULATIONS AND CLEANUP STANDARD

Relevant regulations and cleanup standards are identified below:

- MTCA Method A Soil Cleanup Levels for Unrestricted Land Uses.
- Spokane Basin Background Metals Concentrations (San Juan 1994).



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applicable regulations and cleanup standard
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- Washington Administrative Code Dangerous Waste Regulations Chapter 173-303.

As outlined in the Soil Management Plan for Riverfront Park (GeoEngineers 2017), three soil handling categories were developed to guide the City and the City's contractors during soil excavation and stockpile management activities. Use of these categories and protocols is predicated on subsurface soil within each project area being adequately characterized and extents of each soil category sufficiently delineated. Based on the data collected from previous investigations, COCs in soil have been characterized.

Table 1 - Cleanup Criteria for Unrestricted Land Uses

Analytical Parameter	Constituent	MTCA Method A Cleanup Level (mg/kg)
Total Petroleum Hydrocarbons	1. Gasoline Range Organics 2. Diesel Range Organics 3. Residual Range Organics	1. 100 ¹ 2. 2,000 3. 2,000
Metals	4. Arsenic 5. Barium 6. Cadmium 7. Chromium 8. Lead 9. Silver 10. Selenium 11. Mercury 12. Benzo(A)pyrene	4. 20 5. NE 6. 2 7. 2,000 8. 250 9. NE 10. NE 11. 2 12. 0.1
Polycyclic Aromatic Hydrocarbons	13. Naphthalene 14. cPAHs Toxic Equivalency	13. 5 14. 0.1 ²

Notes:

1 Cleanup level for total naphthalenes (naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene)

2 Toxic equivalency for carcinogenic poly aromatic hydrocarbons (cPAHs) calculated using the toxic equivalency factors found in MTCA Table 708-2.

mg/kg = milligrams per kilogram; NE = Not Established

Table 2 - 90th Percentile Spokane Basin Background Soil Concentrations

Metal	Spokane Basin Background Concentration, 90th Percentile (mg/kg)
1. Arsenic	1. 9.34
2. Cadmium	2. 0.7
3. Chromium	3. 17.8
4. Lead	4. 14.9
5. Mercury	5. 0.02

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applicable regulations and cleanup standard
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3.1 CONTAMINATED SOIL

For the purposes of soil handling for the Redevelopment Project, soil is considered "contaminated" if:

- Contaminant concentrations for any analyte exceed MTCA Method A for Unrestricted Land Use cleanup criteria;
- Contaminant concentrations meet or exceed dangerous waste and dangerous waste source criteria as defined in WAC 173-303;
- Toxicity characteristic leaching procedure results exceed Resource Conservation and Recovery Act (RCRA) regulatory levels; or
- Physical evidence of contamination (sheen, chemical or petroleum odor, staining) is observed, unless additional chemical analysis is performed to further categorize the soil.

3.2 IMPACTED SOIL

Soil is considered "impacted" if:

- Petroleum compound and PAH concentrations for any analyte exceed laboratory reporting limits but are less than the respective MTCA Method A Cleanup Criteria for Unrestricted Land Use; or
- Metal concentrations exceed the laboratory reporting limits and twice the established 90th percentile Spokane Basin Background Concentration, however are less than the respective MTCA Method A Cleanup Criteria for Unrestricted Land Use.

3.3 CLEAN SOIL

Soil is considered "Clean" if:

- Contaminants are not detected for any analyte at concentrations that exceed the respective method reporting limit (method reporting limits for non-detect analytes must be less than applicable MTCA Method A cleanup levels for unrestricted land use for soil to be considered "clean");
- Metal concentrations do not exceed twice the established 90th percentile Spokane Basin Background Concentrations;
- Physical evidence of contamination (sheen, odor or staining) is not observed; and



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Summary of Revitalization Activities
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- Clean Soil includes soil where COCs are not detected or COC concentrations were detected at concentrations that represent background conditions. There are no special handling or end-use requirements for this soil.

4.0 SUMMARY OF REVITALIZATION ACTIVITIES

Revitalization of Riverfront Park on Havermale Island will include construction of a Central Promenade along the larger north/south Howard Street Promenade and revitalization of the US Pavilion Event Center (Pavilion). Construction of the promenade includes removing about 4,000 cubic yards (CY) of soil to level the site grade and installation of new communication, gas, electric and water utilities. As part of the upgrades, an existing 12-inch-diameter water main will be upgraded to an 18-inch diameter water main. The promenade will be finished with a combination of open grass areas and impervious hardscape.

Construction of the Pavilion will include removal of most of the existing buildings in the interior of the Pavilion and construction of a large terraced embankment approximately 35 feet high along the eastern interior. An elevated pathway will be constructed over the terraced embankment. The western area of the pavilion floor will be finished with a combination of asphalt and concrete. Construction of the terraced embankment is expected to require about 25,000 CY of material.

5.0 SUMMARY OF CLEANUP ALTERNATIVES

Construction of the proposed revitalization will include import soil for the terraced embankment and removal of contaminated soil from the Central Promenade. In addition, the Ice Ribbon and Looff Carousel revitalization projects required a net export of about 8,000 CY of contaminated and impacted soil. This soil was temporarily stockpiled on the north bank of Riverfront Park and is available for reuse in accordance with the soil management plan (GeoEngineers 2017). To construct the Havermale Island revitalization projects at Riverfront Park and address impacted and contaminated soil at the Property, three different remedial alternatives were considered including Alternative #1: No Action, Alternative #2 Reuse of Soil and Capping and Alternative #3 Off-Site Disposal of Excavated Soil.

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Summary of cleanup alternatives
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5.1 ALTERNATIVE #1 – NO ACTION

This alternative assumes that the revitalization projects at the Park would occur and that soil from the Ice Ribbon, Loeff Carousel and Central Promenade would have been exported off site. This also assumes that all the soil for the Pavilion project would have been imported. 4,000 CY of crushed concrete would be used as part of the terraced embankment fill. Utilities through the Central Promenade and Pavilion would be installed in the contaminated soil and contaminated soil would be left near the surface. Stormwater would be infiltrated into contaminated soil on the island, like the current configuration.

5.2 ALTERNATIVE #2 –REUSE OF SOIL AND CAPPING

This alternative includes segregating impacted/contaminated soil from clean soil during the construction of the Ice Ribbon, Loeff Carousel, Howard Street Promenade, and Pavilion and using the soil as part of the terraced embankment fill at the Pavilion. It is estimated that on-site fill sources could provide 12,000 CY of soil for the terraced embankment fill. An additional 4,000 CY of crushed concrete from demolition of the buildings would also be utilized.

Based on the approved Soil Management Plan, soil stockpiled on the North Bank and soil excavated from the Central Promenade, utility corridors and drainage swales meet the criteria for reuse on site. If soil excavated from the Central Promenade or utility trenches visually indicates the presence of petroleum contamination, it will be disposed of off-site. Clean soil will be imported and used as backfill around potable water lines.

Material designated for the terraced embankment fill will be manually screened and only the material 4-inches diameter or smaller used. Contaminated soil placed as part of the terraced embankment fill will be covered with orange safety fencing as a demarcation indicator. Contaminated soil will then be covered by at least 12 inches of clean soil. The terraced embankment will be finished with grass turf, paths of concrete, concrete pavers and concrete retaining walls. An underground irrigation system will be installed to maintain the turf. Stormwater would not be directed to infiltrate into contaminated soil. Stormwater would be directed to treatment systems or features before discharge to the Spokane River. The location of impacted and contaminated soil will be recorded in an environmental covenant.

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Evaluation of Cleanup Alternatives
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5.3 ALTERNATIVE #3 – OFF-SITE DISPOSAL OF EXCAVATED SOIL

This alternative includes disposing of the soil stockpiled on the North Bank (8,000 CY) and soil from the Central Promenade (4,000 CY) off-site at an approved landfill facility. The terraced embankment in the pavilion would then be constructed entirely of imported soil. Excavated soil for utility trenches would be disposed of off-site and clean imported fill would be brought in to replace it. Contaminated soil where stormwater infiltration features are installed and along a pathway to the Spokane River would be removed to bedrock and disposed of at an approved landfill. The excavation would then be backfilled with clean imported soil.

6.0 EVALUATION OF CLEANUP ALTERNATIVES

The three cleanup alternatives were evaluated based on the following criteria: effectiveness, implementation feasibility, remedial costs, and general reasonableness. For cost estimating purposes, it was assumed that 4,000 CY of crushed concrete could be used as embankment fill for each of the proposed alternatives.

6.1 ALTERNATIVE #1 – NO ACTION

Effectiveness – The No Action Alternative is effective to remove contamination from the Central Promenade. It is not effective to reduce mobilization of contamination from stormwater infiltration or the potential for leaching into potable water supplies. It is also not effective in open grass areas and allows contaminated soil to be located near the surface which could complete the ingestion pathway.

Implementation Feasibility – This alternative is easily implemented.

Remedial Costs – The remedial cost for this option include the disposal of 12,000 CY of soil from the Central Promenade and North Bank and import 21,000 CY of soil for the terraced embankment. The Estimated cost for this option is about \$1,600,000.

General Reasonableness – This alternative provides minimal long-term management of the site's impacted and contaminated soil by disposing of soil from the Central Promenade. This alternative provides minimal protection from site contaminants and as a result, this is not a reasonable cleanup option.



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Evaluation of Cleanup Alternatives
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6.2 ALTERNATIVE #2 – REUSE OF SOIL AND CAPPING

Effectiveness – This alternative is an effective way to limit exposure and manage contaminated soil at the Property. An institutional control would need to be recorded to maintain the integrity of a soil cap and eliminate the ingestion pathway for the public. This alternative effectively manages contaminated soil that require removal from the Site while retaining soil that meets the criteria for reuse onsite.

Implementation Feasibility – This alternative will be moderately difficult to implement because it will require planning and coordination with redevelopment activities to limit exposure to impacted or contaminated soil reused on-site at the Park. Impacted or contaminated soil will be used as fill for the terraced embankment and in other areas of Havermale Island. The contaminated soil will be capped with one foot of clean soil or placed under impervious surfaces to prevent ingestion of contaminants. Clean soil will be brought to the site to backfill around potable water lines and stormwater features will need to be designed, permitted and constructed to discharge stormwater to the Spokane River and minimize infiltration into contaminated soil.

Remedial Costs – Remedial cost for this option include installation of 38,000 square feet (sf) of orange construction fencing over contaminated soil in the terraced embankment. Approximately 12,000 CY of contaminated soil and 4,000 CY of crushed concrete would be used to construct the terraced embankment. An additional 9,000 CY would be required to construct the remainder of the terraced embankment. Additional costs include design, permitting and construction of stormwater treatment facilities. The estimated remedial costs for this alternative are approximately \$431,000.

General Reasonableness – This alternative provides management of the site's contamination minimize exposure to contaminated soil and facilitates site redevelopment. It does require a long-term commitment to maintain the soil covers and recording institutional controls for the Property.

6.3 ALTERNATIVE #3 – OFFSITE DISPOSAL OF ALL EXCAVATED SOIL

Effectiveness – Comprehensive soil excavation and off-site disposal is a highly effective as it removes all hazardous and potentially hazardous substances and utilizes an approved off-site disposal facility for final disposition. However; areas outside of the revitalization projects will likely remain and be contaminated with site COCs.



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recommended cleanup alternative
April 24, 2018

Implementation Feasibility – Implementation of this alternative is feasible; however, it has the highest cost of the three remedial alternatives and requires importing the greatest quantity of clean backfill material. Installation of stormwater infiltration facilities that can show a pathway to the Spokane River that doesn't intercept contaminated soil would be difficult and could require extensive excavation and backfill and the excavations could undermine existing site infrastructure.

Remedial Costs – Remedial costs for this alternative include disposal of 12,000 CY of soil from the Central Promenade and North Bank and an additional 4,000 CY (estimated) for utility trenching and stormwater infiltration facilities. This alternative also includes the cost to import 21,000 CY of soil to construct the terraced embankment. The estimated remedial costs for this alternative are approximately \$2,067,000.

General Reasonableness – These alternative removes barriers to redevelopment enabling the City and Parks department to proceed with revitalization of the park.

7.0 RECOMMENDED CLEANUP ALTERNATIVE

The recommended cleanup alternative is Alternative #2 – reuse of soil and capping. This alternative minimizes contaminant exposures and is the most economical to implement. In addition, it beneficially uses soil that would otherwise be placed into a landfill. Alternative 2 also requires the City to record an environmental covenant and manage Park maintenance activities throughout the Havermale Island. This option enables the City and Parks department to efficiently proceed with the proposed redevelopment activities.

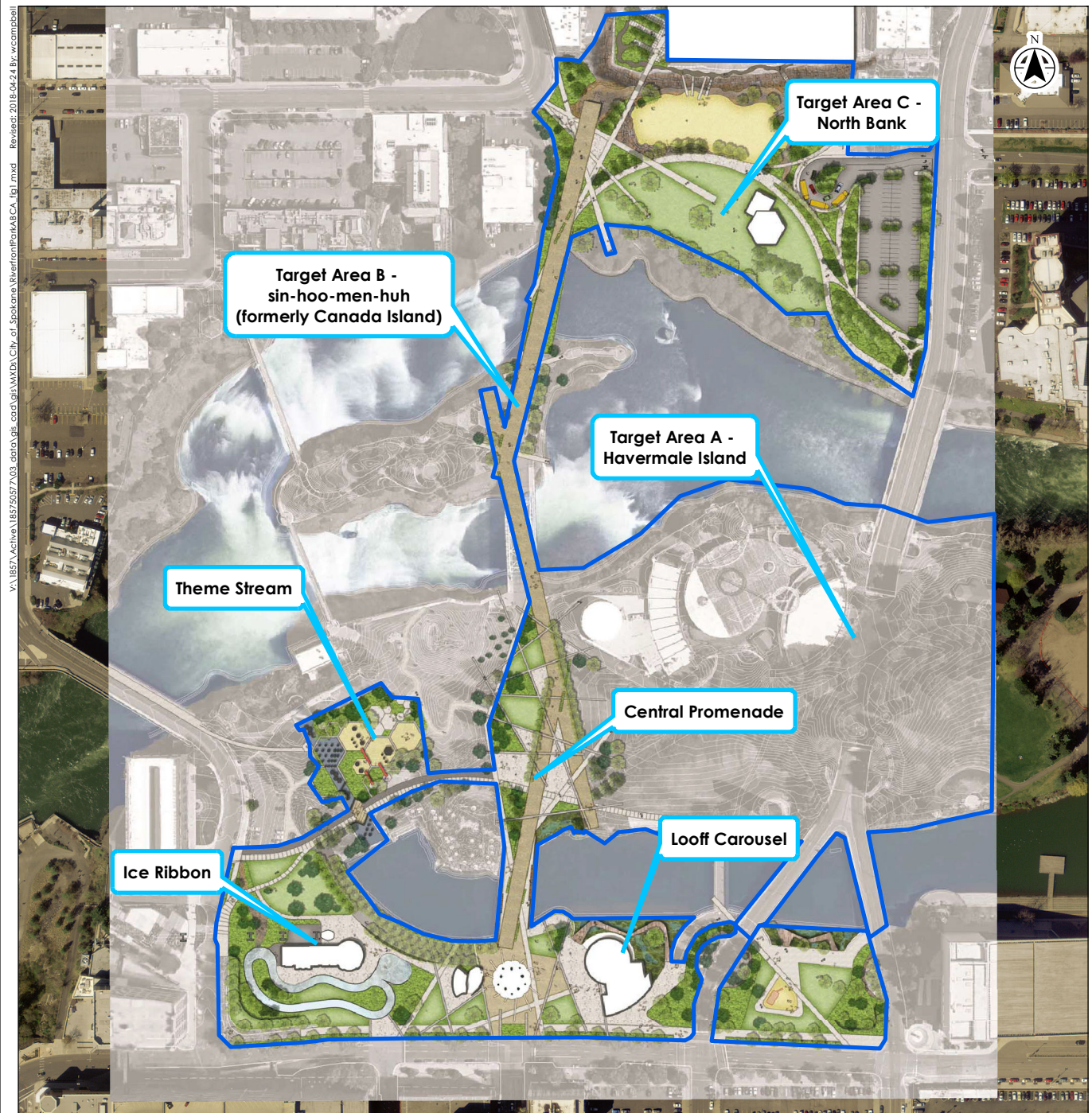
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References
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- GeoEngineers. 2016. *Geotechnical Engineering Evaluation and Environmental Site Assessment, Riverfront Park Ice Ribbon and Skyride Facility, Spokane, Washington*. June 7.
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FIGURES



Notes
 1. Coordinate System: NAD 1983 UTM Zone 11N
 2. Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China

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 Planned Development Areas

0 200 400 Feet
 1:3,600 (at original document size of 8.5x11)



Project Location
 Riverfront Park
 Spokane, WA

Prepared by JB/WC on 2018-04-23
 Technical Review by CG on 2018-04-24
 Independent Review by CG on 2018-04-24

Client/Project
 City of Spokane
 EPA Brownfield Cleanup Grant

Figure No.
 1

Planned Development Areas



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TABLE 3

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA) FOR RIVERFRONT PARK, TARGET AREA A, HAVERMALE ISLAND

April 24, 2018

Table 3 -Projected Soil Cleanup Costs

Havermale Island

Riverfront Park

Redevelopment

Spokane, Washington

	Alternative Cost	Total Cost
<u>Alternative 1-Import Soil</u> Import 21,000 CY of soil to backfill the Pavilion (33,075 tons at \$20/ton) Off-site disposal of 12,000 CY of impacted/contaminated soil from the North Bank and Central Promenade at (18,900 tons at \$50/ton)	\$661,500 \$945,000	\$1,606,500
<u>Alternative 2-Reuse Onsite and Capping</u> Place 38,000 sf orange construction fencing for demarcation (\$0.08/sf) Stormwater infiltration design, permitting and construction Import 9,000 CY of clean soil to backfill the Pavilion (14,175 tons, at \$20/ton) Import 3,000 CY of clean soil to cover contaminated soil in the Central Promenade (4,725 tons, at \$20/ton) Consultant oversight and reporting	\$3,040 \$30,000 \$283,500 \$94,500 \$20,000	\$431,040
<u>Alternative 3-Off-Site Disposal</u> Off-site disposal of 12,000 CY of Impacted/contaminated soil from the North Bank and Central Promenade at (18,900 tons at \$50/ton) Off-site disposal of 4,000 CY of contaminated soil from utility trenching and stormwater infiltration features (6,300 tons at \$50/ton) Import 21,000 CY of soil to backfill the Pavilion (33,075 tons at \$20/ton) Import 4,000 CY of soil to backfill utility trenches and stormwater infiltration areas (6,300 tons at \$20/ton) Consultant oversight and reporting	\$945,000 \$315,000 \$661,500 \$126,000 \$20,000	\$2,067,500