



Offsite Removal Action Work Plan

Former JH Baxter & Co. Facility, Eugene, Oregon, ECSI No. 55

October 10, 2023

Prepared for:



Prepared by:

GSI Water Solutions, Inc.

650 NE Holladay Street, Suite 900, Portland, OR 97232

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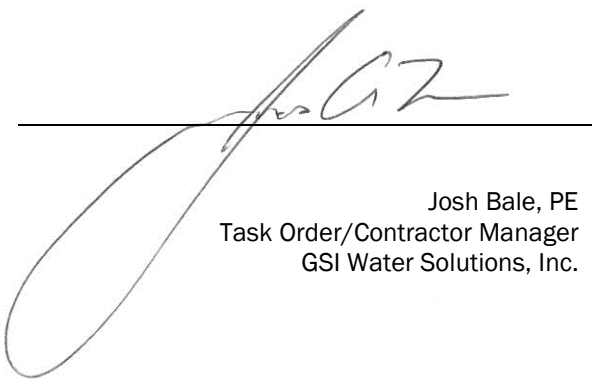


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Environmental
Quality

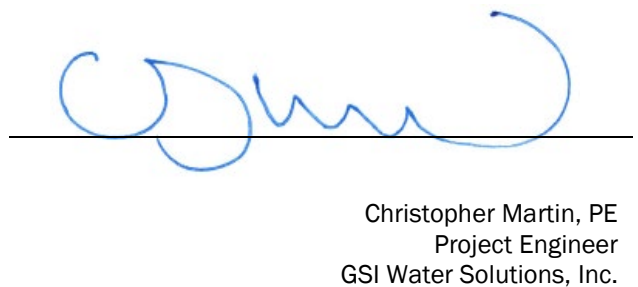
Prepared by:



GSI Water Solutions, Inc.



Josh Bale, PE
Task Order/Contractor Manager
GSI Water Solutions, Inc.



Christopher Martin, PE
Project Engineer
GSI Water Solutions, Inc.

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Abbreviations and Acronyms

Baxter	JH Baxter & Co.
bgs	below ground surface
BMP	Best Management Practice
City	City of Eugene
CUL	cleanup level
DEQ	Oregon Department of Environmental Quality
DU	Decision Unit
EPA	U.S. Environmental Protection Agency
ESCP	Erosion and Sediment Control Plan
EWEB	Eugene Water and Electric Board
Facility	former JH Baxter & Co. facility in Eugene, Oregon
GSI	GSI Water Solutions, Inc.
HASP	Health and Safety Plan
HAZWOPER	Hazardous Waste Operations and Emergency Response
HVAC	heating, ventilation, and air conditioning
IDW	investigation-derived waste
NPDES	National Pollutant Discharge Elimination System
OHA	Oregon Health Authority
PAH	polycyclic aromatic hydrocarbon
PCDD/F	polychlorinated dibenzo-p-dioxin and polychlorinated dibenzofuran
PCP	pentachlorophenol
pg/g	picograms per gram
PPE	personal protective equipment
RA	removal action
RBC	risk-based concentration
ROD	Record of Decision
TCDD	2,3,7,8-tetrachlorodibenzodioxin
TEQ	toxicity equivalence quotient
Work Plan	Removal Action Work Plan

SECTION 1: Introduction

This Offsite Removal Action (RA) Work Plan (Work Plan) presents the soil removal procedures for remediating offsite properties near the former JH Baxter & Co. (Baxter) facility in Eugene, Oregon (the “Facility”) (Figure 1). In 2020 and 2021, sampling activities were conducted to characterize polychlorinated dibenzo-p-dioxin and polychlorinated dibenzofuran (PCDD/F) concentrations in surface soils (up to 1.0 foot below ground surface [bgs]) at offsite residential properties suspected to be affected by air emission deposition from the Facility. Results found PCDD/F concentrations, represented collectively as a 2,3,7,8-tetrachlorodibenzodioxin (TCDD) toxicity equivalence quotient (TEQ) values, elevated in comparison to background sample locations. With input from the Oregon Health Authority (OHA), the Oregon Department of Environmental Quality (DEQ) prioritized cleanup of properties with PCDD/Fs at or above 40 picograms per gram (pg/g) TCDD TEQ in surface soil, which was considered to present health risks to children younger than 6 years of age (OHA, 2023). This cleanup level (CUL) is currently being used by DEQ to prioritize cleanups, but the DEQ may use other, lower, action levels in the future to guide or prioritize property cleanups. Three properties initially sampled in 2020 and 2021 exceeded this concentration. Additional sampling was performed by DEQ and the U.S. Environmental Protection Agency (EPA) in 2022 and 2023 to expand the investigation area and determine the depth of RAs. These investigations resulted in a total of seven properties with TCDD TEQ values above 40 pg/g in surface and shallow soil.

1.1 Purpose

The purpose of the RA is to reduce potential human health risks by removing surficial and shallow soil at properties with PCDD/F contamination that DEQ has identified for cleanup. Currently, removal on the affected properties will be conducted to a depth where the PCDD/F concentrations are below the CUL of 4.7 pg/g TCDD TEQ. DEQ may develop a site-specific CUL that is different than 4.7 pg/g in the future. This Work Plan is intended to outline general procedures for RAs associated with PCDD/F concentrations above the CUL.

1.2 Document Organization

This Work Plan summarizes the RA procedures. The Work Plan is organized into the following sections:

- **Section 1** – Introduces the project, objectives, and Work Plan.
- **Section 2** – Briefly describes the Facility setting and summarizes the operational and regulatory history of the Facility.
- **Section 3** – Presents the Work Plan objectives.
- **Section 4** – Identifies preparatory activities.
- **Section 5** – Describes the removal activities.
- **Section 6** – Describes backfill and site restoration.
- **Section 7** – Discusses investigation-derived waste (IDW) and decontamination requirements.
- **Section 8** – Describes the Communication Plan for the RA field activities.
- **Section 9** – Describes the reporting requirements.
- **Section 10** – Presents a schedule of RA tasks.
- **Section 11** – Includes a list of references cited in this Work Plan.

Appendices to this Work Plan include the following:

- **Appendix A** – Site-Specific Health and Safety Plan (HASP)
- **Appendix B** – Offsite Removal Action Scope Memoranda

1.3 Limitations

This Work Plan has been prepared for DEQ. Work for this project will be performed in accordance with generally accepted professional practices relating to the nature of work completed at the same or similar localities. It is intended for the exclusive use of DEQ and for specific application to this project. No other warranty, express or implied, is made.

SECTION 2: Background

The JH Baxter & Co. facility is a former wood treating facility located at 85 Baxter Street in Eugene, Oregon (Figure 1). A brief summary of the Facility's development history and previous environmental activities conducted near the Facility are provided in this section. For a detailed description of the Facility and previous Facility activities, refer to DEQ's Record of Decision (ROD) issued for the Facility (DEQ, 2019).

2.1 Development History

The Facility was developed and began wood treatment in 1943. The earliest treating processes used creosote formulations in a single retort (i.e., a pressurized vessel). In 1945, a second retort was added for treating wood products with pentachlorophenol (PCP). Between 1945 and 1970, the Facility added four more retorts, which used PCP, metals-based treating solutions, and fire retardants. Operations at the Facility ended on January 31, 2022.

2.2 Previous Environmental Activities

Identified Contaminants. From 1985 through 1989, several investigations confirmed releases of hazardous substances to soil and groundwater within the limits of the Facility. Hazardous substances detected at the Facility include PCP, arsenic, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds, polychlorinated biphenyls, and PCDD/Fs. While PCDD/Fs can be from various sources, PCDD/Fs are associated with PCP as they are generated as a contaminant by-product during the manufacturing process of PCP.

Remedial Investigation. On August 3, 1989, DEQ and Baxter signed an Order on Consent, which was subsequently amended on September 16, 1994, in which Baxter agreed to complete a remedial investigation and feasibility study and to undertake interim remedial measures. Characterization of the nature and extent of contaminants at the Facility was performed in phases.

Offsite surface soil sampling was completed in 1998 at adjacent commercial properties. This offsite investigation analyzed surface soil for arsenic and PAHs. Arsenic was identified above its applicable risk-based concentration (RBC) at three of the commercial properties sampled. Baxter completed an RA in October and November 1999 where approximately 417 cubic yards of soil were removed from three commercial properties (Yale Transport, Armored Transport, and Lile of Oregon) (PES, 2010).

ROD. DEQ issued a ROD for the Site in October 2019 (DEQ, 2019). The remedy described in the ROD includes capping about 16 acres of contaminated soil at the Facility, continuing groundwater pumping for hydraulic containment of contaminated groundwater, removal of contaminated ditch sediments on the south side of the Facility, and sampling of soil and sediments in offsite areas that could reasonably have been impacted by contaminant discharges from the Facility. Offsite areas that were deemed to be more likely to have been impacted are to the north and south of the Facility, in the direction of the prevailing winds.

Offsite Soil Investigations. In 2020 and 2021, Baxter conducted additional offsite soil sampling in areas near the Facility to update their understanding of offsite surface soil contamination potentially associated with airborne migration and runoff, as required in the ROD (DEQ, 2019). A 2020 air deposition model by Lane Regional Air Protection Agency indicated that the predominant wind directions from the Facility were to the north and the south. Based on this analysis and the 2020 analytical results (GSI, 2020), additional surface soil sampling was conducted in 2021, 2022, and 2023 in background areas and at residential properties within areas of potential air deposition to the north of the Facility. Beginning in 2021, surface soil sampling was completed using the Incremental Sampling Methodology, in which an area or residential

property (called a Decision Unit [DU]) was divided into a grid of 50 sub-areas. A subsample was collected from each of these sub-areas and all 50 subsamples were combined to create one single sample for homogenization and analysis. Subsurface soil was collected as 5-point composite samples. Contaminants of interest included total metals (arsenic, chromium, copper, and zinc), PAHs, PCP, and PCDD/Fs.

The offsite investigation results indicated that PCDD/Fs should be retained as contaminants of concern. Many of the residential yards and other non-background areas sampled exceeded DEQ's RBC of 4.7 pg/g TCDD TEQ for direct contact with residential soil (DEQ, 2023). Some of these residential yards also exceeded the OHA risk level of 40 pg/g (discussed in Section 2.3).

2.3 Early Action Cleanup Level

In 2023, the OHA identified a 40 pg/g TCDD TEQ value as a threshold for expedited cleanup of residential properties near the Facility (OHA, 2023). The value was based on the consideration of increased non-cancer human health risks related to children under 6 years of age regularly exposed to residential soil. DEQ subsequently adopted the 40 pg/g value as an early action CUL for initial Baxter offsite RA activities.

Once a residential property was identified as requiring early action soil removal, the total depth of soil removal was determined by the maximum vertical depth where PCDD/F concentrations exceeded DEQ's RBC for direct contact by residential receptors of 4.7 pg/g (DEQ, 2023).

2.4 Determination of Extent of Remedial Action

In January 2022, Baxter notified DEQ they would not be able to implement cleanup at the residential yards in a timely manner, and suspended wood treatment activities at the Facility. DEQ subsequently declared the Facility an Orphan Site to enable utilization of the Industrial Orphan Site Account to complete the RA at the offsite residential yards (DEQ, 2022). To define the extent of RA, DEQ implemented an additional offsite investigation in June 2022 to delineate the extent and magnitude of elevated PCDD/F contamination in surface soil at the residential properties nearest to the Facility (GSI, 2022). The collective sampling between 2020 and 2022 resulted in identifying a total of four properties where PCDD/F concentrations exceeded the early action CUL of 40 pg/g TCDD TEQ.

In May 2022, EPA's Superfund Technical Assessment and Response Program also assisted DEQ with the Baxter offsite property investigation. EPA's work expanded on the surface soil sampling conducted by Baxter and DEQ with a focus on bounding the extent of contamination in surface soil in the neighborhood north of the Facility. In total, EPA collected surface soil samples from 52 additional properties. Analytical data provided by EPA following their investigation have informed the extent of impacts within the residential area. EPA's sampling identified three additional residential yards with PCDD/F concentrations in surface soil above 40 pg/g, necessitating RA at these properties.

In April 2023, DEQ implemented a supplemental investigation with the purpose of determining the depth to which PCDD/F concentrations exceeded the DEQ's RBC of 4.7 pg/g in subsurface soil at the seven selected residential yards. The results of this investigation, with previous data, indicated that PCDD/F concentrations generally decrease with distance from the Facility and with soil depth within the residential yards. Three of the seven properties have PCDD/F concentrations exceeding the RBC at depths more than 1 foot. These data, plus the conclusions from an arborist evaluation used to support RA, are provided in the Offsite Investigation Report (GSI, 2023).

SECTION 3: Removal Action Objectives

The objective of the offsite RA is to remove shallow soil impacted with PCDD/Fs to reduce the risk of direct contact to people and the environment. The extent of the RA was determined from multiple offsite investigations of properties near to the Facility. To meet the objective of the RA, the following activities will be completed:

- Remove soil exceeding 4.7 pg/g TCDD TEQ from properties where RA was identified based on exceedance of the early action CUL. Total depth of removal varies from 0.5 to 2.0 feet bgs. Required depths of excavation at specific properties are:
 - DU-09 (210 Baxter Street): 1.5 feet bgs
 - DU-10 (220 Baxter Street): 1.5 feet bgs (front yard sub-DU), 1.0 feet bgs (back yard sub-DU)
 - DU-11 (215 Baxter Street): 2 feet bgs (front/side yard sub-DU), 1 foot bgs (back yard sub-DU)
 - DU-15 (225 Baxter Street): 1 foot bgs
 - SO-06 (240 Baxter Street): 0.5 feet bgs
 - SO-07 (235 Baxter Street): 1 foot bgs (front/side yard sub-DU), 0.5 feet bgs (back yard sub-DU)
 - AP-01 (242 Alva Park Drive): 0.5 feet bgs
- At each property with soil contamination in the front yard, remove 0.5 feet of soil within the City of Eugene (City) rights-of-way adjacent to properties identified above between the street edges and the property boundaries.
- Dispose of excavated soil at a permitted Subtitle D landfill.
- Remove or transplant trees, shrubs, and other vegetation as recommended by an arborist (GSI, 2023) and/or in agreement between the property owner and DEQ.
- Import clean soil to replace soil removed.
- Revegetate or provide gravel at the surface (where requested by property owner) to prevent erosion of new soil.

The objectives and procedures described in this Work Plan will be applied to future phases of RA, when and if additional properties are identified for soil removal by the DEQ.

SECTION 4: Preparatory Activities

Prior to developing RA Scope Memoranda, GSI Water Solutions, Inc. (GSI) and DEQ met with property owners to discuss and prepare for RA on each of their properties.

4.1 Preparatory Activities for Project Implementation

Several preparatory activities have been and will be performed by GSI and DEQ prior to RA.

Property Walk-Throughs. In June 2023, GSI and DEQ met with each property owner to explain the RA process and walk their property to identify the unique features of each property that will be taken into consideration during RA. The preferences for removal of vegetation and structures, as well as preferred finished surface, were noted during these walk-throughs. Although not every request can be accommodated, the final RA implementation decisions reached by GSI and DEQ have been communicated to each property owner. This information was used to develop the RA Scope Memoranda included in Appendix B.

Site-Specific HASP. Site-specific HASPs must be developed by the oversight consultant and all contractors. GSI's HASP was included in the Offsite Investigation Work Plan (GSI, 2022) and is reattached as Appendix A in this Work Plan. GSI prepared the HASP in general accordance with the Occupational Safety and Health Act and Oregon Administrative Rules. Personnel from GSI will have a copy of the HASP for their use during RA field activities. GSI's HASP only covers GSI personnel and all support contractors shall provide their own HASP upon contracting, which must be completed prior to mobilization.

Property Access. DEQ has obtained or will obtain access agreements with residential property owners to perform RA on their properties. Additionally, soil will be removed within the City right-of-way. As such, a right-of-way permit and traffic control plan may also be required and obtained by the EC (EC), if necessary.

Subcontractor Solicitation. Subcontractor services for RA will include a vegetation subcontractor, an EC, and an arborist subcontractor, as described in detail below:

- A vegetation removal subcontractor for tree removal and vegetation clearing activities will perform vegetation removal ahead of earthwork. This subcontractor will not remove stumps from below the ground surface or remove any roots that would result in ground disturbance.
- An EC will conduct the following duties:
 - Facilitate traffic control along Baxter Street and Alva Park Drive, as needed.
 - Excavation, transport, and disposal of contaminated soil and remaining tree stumps and vegetative root systems.
 - Backfill excavated areas with clean soil or gravel to pre-existing grade (or surrounding grade where grade is elevated around tree base).
 - Transplant select pre-identified and pre-approved by DEQ trees and shrubs, where possible.
 - Reconstruct irrigation.
 - Revegetate property.
 - Coordinate with utility providers, as necessary.
 - Perform private utility location services, utility disconnection, reconstruction, and repairs, where defined and as needed.
 - Remove and replace fencing, as necessary.
 - Perform third-party pre-construction surveys, depth of excavation, and post-construction as-build surveys.
 - Complete an Erosion And Sediment Control Plan (ESCP) and permitting, as necessary.

- Provide transportable storage unit containers (e.g., PODS) for materials on the properties that need to be moved to facilitate cleanup.
- Provide licensed and insured professional movers to load and unload residential property/materials that are stored outside of homes into storage unit containers to facilitate cleanup.
- Provide 24-hour security in the neighborhood during cleanup activities.
- An arborist subcontractor will provide recommendations for tree protections during soil removal (previously contracted during the 2023 Offsite Investigation).

At least three firms will be solicited for each separate contract. Selection will be primarily based on unit or lump-sum pricing and ability to meet the project schedule. The scope of future phases of the RA may vary and will likely require re-solicitation of subcontractors.

Underground Utility Location. The selected EC will arrange to have underground utilities located and marked prior to beginning any subsurface work. The EC will be responsible for contacting the Oregon Utility Notification Center, who will in turn notify the various utilities in the area to mark any underground installations in the vicinity of the work area. The EC will also arrange for a private utility locate and is responsible for any damage to utilities during the implementation of the RA.

4.2 Preparatory Activities with Property Owners/Tenants

Property owners will be required to prepare for RA activities as described below.

Plants/Vegetation. An arborist has visited the RA properties and determined which trees or other vegetation are unlikely to survive excavation to the specified depth and which trees will constitute a safety hazard during RA. These recommendations have been discussed with the property owners and a plan for removal, transplant, or protection has been prepared for each property. The RA will not include protection or transplanting of bulbs and small shrubs. If a property owner would like to save these, they must do so prior to the RA. Replacement options are available for shrubs and bulbs and have been discussed with each property owner. A map showing the trees/shrubs that will be removed (either by the property owner or during excavation) and the trees/shrubs that will be protected is provided in each RA Scope Memorandum in Appendix B.

Yard Features. Yard features include, but are not limited to sheds, vehicles, trailers, greenhouses, shipping containers, toys, and chicken coops. The following protocols will be followed for yard features:

- If a structure is not constructed on a permanent foundation (i.e., concrete or asphalt pad), then access under these features will be required to remove and replace soil to the appropriate depth. This includes sheds, gazebos, greenhouses, and coops. The EC will provide laborers and/or a moving firm to move these structures out of the excavation area.
- Temporary structures moved by the contractor will be reconstructed or replaced depending on their structural stability following temporary removal. Reconstruction or replacement will be pre-approved by DEQ prior to implementing the RA and must be in like-kind.
- Vehicles, boats, and trailers must be moved offsite to provide access to the property. If the property owner cannot complete these tasks, the EC will contract for temporary relocation of these items to a secure location identified by the property owner or DEQ. Personal vehicles may not be stored in driveways or within the residential property area, although they may be parked in garages, on the street or moved to another location during the cleanup (this includes primary residential vehicles, if the owner chooses to utilize one while RA is being completed). If necessary, DEQ will reimburse owners for vehicle storage costs.

- Some yards have items stored throughout the yard that can be moved, but will require an offsite storage space during RA. This includes toys, lumber piles, gardening supplies, etc. The EC will provide offsite storage access or movable storage units (e.g., PODS) to store these items. Residents will be provided the opportunity to move items into these units ahead of time if they wish, or the EC will provide movers to load items into storage. These storage units will be moved to an offsite storage facility during RA activities. The storage units will be returned and unloaded by movers following RA activities.

Garden Borders. Yard features like garden borders (metal/rock/wood) will be removed by the EC to perform the RA. The borders will not be reconstructed as part of the RA. If the property owner would like to save these materials, then they need to complete the task of removing them before the RA is implemented.

Irrigation/Other Subsurface Infrastructure. The property owners will be consulted to determine whether the property has an irrigation system or other subsurface landscape infrastructure that may not have been previously identified by a private utility locator. Any irrigation systems will be removed and replaced during RA, unless the lines are deeper than the excavation depth and are not damaged.

Temporary Offsite Housing. For safety purposes and for RA implementation efficiency, temporary housing will be offered to residents of DUs. Residents will be reimbursed the current General Services Administration rate for hotel and meals per diem per resident of each DU. The length of offsite housing will depend on the EC schedule. Access to vehicles and utilities may also be restricted during a portion of the RA. Owners may need temporary access to their homes, especially if pets are left inside during the cleanup. If so, the owners will need to coordinate with GSI and/or DEQ and the EC to ensure this is done safely.

4.3 Prior Approvals

The following approvals will be obtained prior to implementing the RA to streamline the removal process:

- **Clean Soil Sources.** A source of fill has been identified by DEQ and confirmed to be clean using chemical analyses on a representative sample collected by GSI. The use of this soil has been approved by DEQ, but the source does not contain an adequate quantity to conduct all RA activities. The remainder of imported soil will come from commercial sources in the region. GSI has contacted numerous sources and confirmed that the quantities required for the RA are typically available. Samples of topsoil and non-structural fill soil have been collected from these sources and will be analyzed for PCDD/F. Only materials meeting the CUL (below 4.7 pg/g PCDD/F) will be used as backfill on the properties.
- **Landfill Acceptance.** The disposal facility will be identified by the subcontractor and approved by DEQ prior to beginning the RA. Chemical data from previous investigation activities will be provided to the selected EC to profile soils for disposal in a permitted Subtitle D landfill. Based on a review of chemical data for the residential properties, DEQ personnel have determined that the soil does not contain hazardous waste. Therefore, soil excavated during RAs on residential properties are assumed to be designated as non-hazardous.
- **Permits.** A Commercial Erosion Prevention Permit from the City may be required for each phase of the RA. If subcontractor determines that traffic control or road closure is necessary to complete the RA, the required permits will be obtained by the subcontractor through the City of Eugene. The EC shall provide an ESCP that will present Best Management Practices (BMPs) to be implemented at each property to minimize or prevent soil runoff from the property. Additional BMPs may be required for the earthwork to complete RA during the rainy season (October 15 through April 30; as defined by the City's Erosion Prevention Permit). The BMPs will be implemented by the EC prior to and during excavation. Erosion controls are discussed in Section 5.3.

A National Pollutant Discharge Elimination System (NPDES) 1200-C permit may be required if the scope of proposed earthwork is anticipated to disturb an area greater than 1 acre. The NPDES permit contains an

ESCP that generally outlines BMPs that will be implemented. At this time, no such permit is anticipated; however, during subsequent RAs, the overall area of proposed soil removal should be calculated to determine the applicability of the NPDES permit. Although an NPDES permit may not be required, typical BMPs will be implemented around properties to mitigate erosion from the site. The EC will be responsible for securing the NPDES permit, if applicable.

The City may require tree removal or root pruning permits for City-owned and/or privately owned trees that will be affected during the RA. These permits are procedural and require review by the City, but do not typically have a cost associated with them. Coordination with the City's Urban Forestry and the City's Planning departments will be necessary during excavation. The RA does not intend on removing trees within the City right-of-way but impacts to the critical root zone of City trees will result in coordination with the City's Urban Forestry Department. If during excavation the City or arborist representative determine that a City-owned tree should be removed, the contractor will be responsible for managing the removal process.

Hazardous Waste Operations and Emergency Response (HAZWOPER) Certification. The EC will be responsible for all matters relating to the health and safety of its personnel. This includes recognition of the potential health and safety hazards associated with the work and ensuring the required personnel are in compliance with 29 Code of Federal Regulations 1910.120, as necessary.

SECTION 5: Removal Activities

The RA will be performed to remove contaminated soil from affected properties to achieve the goal of reducing risks to people. The extents of the RAs are based on evaluation of soil data from investigative sampling of offsite properties. Activities will include excavating contaminated soil, backfilling the excavated area with approved, clean soil or approved alternative, and site restoration to prevent erosion, where applicable.

Field operations for RAs will occur during the day. The City has a noise ordinance between the hours of 10:00 p.m. and 7:00 a.m. The EC will adhere to this noise ordinance with motorized equipment starting no earlier than 8:00 a.m. and generally ending no later than 7:00 p.m. or at sunset, whichever is sooner, unless otherwise approved.

5.1 Decision Unit Identification

The final scope of removal for an individual property is defined by offsite investigation activities. A DU defines the area and depth of the RA for a property based on previously collected chemical analytical results and associated risks. For RA, properties consist of one or two sub-DUs each. Multiple properties are not included in one DU. The detailed scope for each DU RA will be discussed in an RA Scope Memorandum, such as those included in Appendix B. Figure 2 shows the seven DUs initially proposed for removal.

5.2 Surveying

A third-party surveyor will confirm the excavation area and property boundaries, depth of soil removal, and the height of imported soil. Field surveys completed by establishing temporary survey monuments near removal areas. An initial, pre-construction baseline elevation survey will be completed at each DU to determine the property boundary and initial ground elevation. During excavation, the depth of removal will be verified against the baseline survey results to confirm removal depth. Following backfill and compaction, a final surface elevation survey will be conducted to confirm that the original grade has been re-established.

In addition to survey data and as-built figures provided by a third-party surveyor, GSI or DEQ will need to observe field survey data and approve the depth of excavation and height of imported soil prior to removing survey monuments and points. Surveyed extents will be required to have a minimum horizontal accuracy of 1 foot and a minimum vertical accuracy of 0.1 feet. RA will not be considered complete until survey elevations and extent are confirmed by GSI and/or DEQ.

5.3 Excavation and Site Controls

The EC will use a combination of heavy equipment and hand tools to complete the excavations. The means and method of soil removal will be determined by the EC while considering guidance provided by the contracted arborist and City urban forester to protect selected vegetation. A GSI representative will be on the site to observe and document removal activities.

Proposed Excavation Limits. The extent of removal at each DU (outlined in Section 3) is predetermined based on review of chemical data collected during environmental investigations and is shown on Figure 2. The final extents of RA excavation will be delineated during RA using surveyed extents with a minimum horizontal accuracy of 1 foot as described above. Previous field surveys of excavation areas were not performed using survey grade equipment and aerial GIS maps do not exactly align with actual property boundaries. Where excavation is proposed to the property limits, the excavation shall extend to the edge of the property as determined by the surveyor.

Sloping. The excavations will be sloped or benched at the excavation boundaries, as necessary, to prevent sloughing and/or undermining of structures. In general, the extents of the DUs will be sloped as described below. If site conditions indicate that the sloping requirements outlined below are not adequate for safety, more conservative sloping or benching can be performed at the discretion of the EC following consultation with GSI and/or DEQ. The sloping requirements include the following:

- The top 6 inches of soil will be removed across the entire extent of the DU regardless of whether the boundary is adjacent to a structure or utility.
- For excavations adjacent to non-load bearing permanent structures (i.e., concrete pads, fence posts, driveways), the excavation will be completed vertically to the extent of the RA unless otherwise determined unsafe by the EC, GSI, or DEQ. This includes concrete pads that hold heating, ventilation, and air conditioning (HVAC) systems.
- Excavations adjacent to residential foundations will be excavated to a minimum of 6 inches bgs at the foundation. The depth of the foundation will be determined by the EC. Soil removal along the foundation will continue to approximately 6 inches above the bottom of the foundation footing, or the bottom extent of the RA, whichever is shallower. Once 6 inches above the foundation base, and, if necessary, the excavation will be stepped out 1 foot before sloping or benching the excavation at a 1 foot horizontal to 1 foot vertical (1:1) to the total depth of excavation.
- At least one permanent residential outbuilding has been identified (within DU-09) that is constructed on pier blocks installed on the surface. The identified structure cannot be moved or deconstructed. In this case, because of safety concerns, soil removal will not be completed up to 6 inches around the pier blocks or under the structure. Sloping at this boundary will be completed from the ground surface to the extent of the RA. A deed notice or restriction may be recorded on this property to account for the contaminated soil left.

Property Access by Subcontractor. To access portions of the property, the EC may need to remove fencing. Fencing may be reused only upon approval of GSI and/or DEQ. Otherwise, a new fence of similar style and height will be installed where removal is conducted. Where landscape trees or shrubs are removed to facilitate excavation activities (which may be performed by the vegetation removal contractor), they will be replaced with the same or similar trees or shrubs; however, it will be impossible to replace large trees/shrubs with the same size plants. Removal of any of these features and replacement of trees or shrubs will be approved by GSI and DEQ with concurrence of the property owner/tenant.

Property access points for machinery will be limited to the extent practicable to minimize track out and interference with property owners. The access points will be delineated using temporary construction fencing and signage, as necessary, to prevent unauthorized access to the work area.

Property Access by Owner/Tenant. Property occupants are encouraged to utilize the temporary housing offered to residents of DUs by DEQ. However, owners/tenants will be allowed to access or stay on their property during RA activities if they wish to do so. In this case, GSI, DEQ, and the EC will coordinate property access with the owner/tenant and will communicate site activities that will affect access to and from the residences and any obstruction of utilities that may occur.

Site Control Management. Site activities may generate the interest of neighbors, the general public, and media representatives. Only authorized personnel with the proper training and personal protective equipment (PPE) will be allowed within the work areas. The EC will be responsible for delineating the work area to limit access. Interested people should be directed to speak to DEQ or GSI's Project Manager for information on the project. Further information on project communication is described in Section 8.

Traffic Control. If subcontractor determines that traffic control or road closure is necessary to complete RA, the required permits will be obtained by the subcontractor through the City of Eugene. The subcontractor will be responsible for establishing traffic control via signage and communicating alternate routes to traffic/pedestrians as needed.

Security. In addition to site control management, the EC will be responsible for providing a 24-hour site security agent to monitor and report any incidents that occur. This may also include perimeter construction fencing to enclose DU properties during non-working hours.

Utilities. Public and private utilities will be located prior to commencing removal activities. Excavation will be sequenced to minimize the potential for heavy equipment or excavation to damage buried utilities, such as having the excavation begin from the edge of the DU (i.e., with equipment positioned on streets and/or right-of-way). The EC shall identify the exact location and depth of all buried utilities that enter the excavation area prior to beginning excavation. If lines cannot be located to the satisfaction of the EC, low-impact methods shall be used to locate end points of utilities (i.e., air knitting or hand tools). Soil will be removed using these methods until the utility is uncovered.

If excavation work continues below existing utilities or if a high risk of utility failure is anticipated due to excavation work, subcontractor will remove and replace utility lines in accordance with City of Eugene building code. At the end of RA, utilities will be video recorded or pressure tested to ensure that no damage has occurred. Subcontractor will replace damaged utilities as necessary.

Power poles are present on some DUs. The EC will notify Eugene Water and Electric Board (EWEB) about proposed excavations adjacent to power poles. EWEB may be required to be onsite during these excavations and the EC will coordinate directly with EWEB, when required.

Natural gas utilities are known to cross DUs in the area. The gas utility provider will likely require notification of excavation and may require a representative to be present while excavation occurs. The EC shall follow all requirements of the gas utility provider. It will be the responsibility of the earthwork excavator to notify and coordinate site activities with utility providers.

The property owner/tenant will also identify whether the property has an irrigation system or other subsurface landscape infrastructure. The EC will attempt to remove, salvage to the extent practical, and replace components within the excavator area, as necessary.

Tree Removal. As described in the Arborist Report (Appendix C of the Offsite Investigation Report [GSI, 2023]), approximately 18 trees are recommended to be removed from initial RA properties (three trees along the City right-of-way will not be removed unless required by the City). Tree removal, including smaller trees and blackberry bramble removal, will occur before soil excavation by a separate contractor. The EC is required to remove stumps and vegetative root systems within the excavation footprint.

Limited Vegetation Transplants. A limited number of smaller decorative trees, shrubs, and rose bushes of significance to the residents have been recommended for removal or transplant during the RA. The manner of transplant will be determined by the landscape subcontractor retained by the EC. The arborist will provide recommendations for survival. However, the survival of these plants cannot be guaranteed, and the residents can choose to have the EC replace in like-kind. The health of transplanted vegetation will be monitored along with installation of new landscape plants and surface sod or seed installed on properties (described below).

Saved Trees. Trees within soil removal areas that will remain in the ground have been pre-defined and will be protected by using low-impact methods (e.g., hand tools) to excavate around the critical root zone. The

majority of these sensitive excavations will be observed by the subcontracted arborist. The City Urban Forester may also provide oversight when working near trees in the City right-of-way.

Protections. During excavation, the EC will delineate the vegetation to be protected in place with a temporary construction fence or barrier. Permanent structures or structures that will not be moved, but are adjacent to excavation areas, will be delineated with temporary construction fence. This does not necessarily include the primary residential structure, but will apply to utilities, outbuildings, perimeter fences, etc.

Erosion Control. A Commercial Erosion Prevention Permit from the City will be required for each phase of the RA. The EC will prepare and sign the permit as the acting “Owner” of the project. The EC will be required to provide GSI and DEQ with an ESCP to meet the requirements of the City’s Erosion Prevention and Construction Site Management Program.

BMPs outlined in the ESCP will be installed to prevent soil from being eroded, tracked, washed, or blown from the site and onto City streets, neighboring properties, or nearby waterways. This will include the use of silt fencing and/or straw wattles at property boundaries, use of temporary construction entrances, covering soil piles overnight and during windy conditions, spraying soil piles to prevent dust generation, street sweeping at the end of each day (as needed), and manually spraying mud and dirt from trucks prior to leaving the site. A GSI representative will monitor and document that BMPs are installed or enacted by the EC during their activities.

Soil Stockpiling. Soil stockpiling should be avoided, if possible, to minimize the handling of impacted soil. If deemed necessary, soil stockpiling activities will be coordinated with and approved by GSI and DEQ. If the EC elects to stockpile contaminated soil for later off-haul, soil will remain only within the excavation area and shall not be staged for longer than 2 days. During periods of inactivity (i.e., weekends and nights), stockpiles will be covered and secured with at least 6-mil plastic sheeting to prevent wind or stormwater erosion or as required by the Erosion Prevention Permit. Plastic sheeting will be secured against wind and rain and sloped to drain precipitation without ponding. A berm will be installed around the stockpile, as needed, to physically contain the soil and/or prevent stormwater runoff from exiting the work area. Impacted soil will not be stockpiled outside of the DU property boundary.

Confirmation Sampling. The depth of excavation within each DU was predetermined during previous sampling events. Confirmation samples will not be collected following excavation. The depth of soil removal will be confirmed using survey information described in Section 5.2.

5.4 Loading and Transport

Soil will be loaded in a manner that does not generate visible dust in the work area. To prevent dust generation, the EC will provide a water truck or trailer and supply water; alternatively, municipal water supplied by a fire hydrant near the property can be used, if the proper permitting is obtained. The EC shall meter and pay for all water used. Residential water taps should not be used to supply water for dust suppression, or other activities.

Prior to departure, loose soil will be brushed from the outside of the truck and added to the load or to another truck load. Truck loads will be covered with a tarp to reduce the risk of spreading contamination to offsite areas. Appropriate BMPs will be used to prevent soil from being tracked off the site. If soil is spilled or tracked onto rights-of-way, the EC will sweep and collect the soil and return it to the DU or to a departing truck. At the end of each day, streets will be swept (as needed) and any gathered material will be added to the truck load prior to departure. Contaminated soil will be transported directly to the Subtitle D landfill for disposal. The truck driver shall only depart after receiving a signed bill of lading (e.g., a copy of the landfill permit) provided by the EC.

SECTION 6: Backfill and Restoration

Following confirmation that excavated extents have been achieved and upon approval by GSI, excavated areas will be backfilled to the original grade with clean, imported topsoil (top 6-inches) or gravel (top 1 foot) and clean fill for any depth below the top foot. Ground coverings will mostly be sod or seed mix installed over the imported topsoil, but some areas will be covered in gravel only as requested by the property owner and approved by DEQ. Final excavation surveys will be performed and following sod placement. Site controls described in Section 5 will continue through the backfill and restoration phases of the RA.

6.1 Backfill

Earthwork equipment and hand tools, where necessary, will be used to distribute the pre-approved clean soil and topsoil or stockpiled soil from Short Mountain across the DU. Truckloads of imported soil will be dumped directly within the DU, but only where excavation depths have been approved by GSI. BMPs will be implemented that will reduce visible dust (i.e., wetting soil), if necessary. Imported material will not be staged within the rights-of-way or areas outside of the DUs. A GSI representative will be present to document the volume of soil delivered and method of installation at each DU. Backfill installed below 12 inches bgs shall be placed in lifts no thicker than 12 inches and compacted to a non-yielding state. Compaction testing will not be required. Topsoil shall not be over-compacted but must be tracked across with wheeled or tracked equipment prior to sod placement to minimize future settlement.

6.2 Sod Installation

DUs with removal activities will be restored by installing grass sod, unless otherwise specified in the RA Scope Memorandum for that property, per communications with the property owner and approval by DEQ. Sod has a higher rate of survival than planting seed, requires less initial maintenance to become established, and can be walked on or used sooner than new seed lawn. The EC shall subcontract with a landscaping firm with experience installing sod lawns, unless the EC is pre-approved for placement based on sufficient experience provided to GSI and DEQ. The method of sod installation will be determined by the landscape firm and based on their local experience. The landscaping firm will thoroughly saturate the sod after placement and perform one additional watering 1 week later. The landscaping firm will then provide instructions to the property owner, who will subsequently be responsible for watering, fertilizing, and otherwise maintaining the lawn until the landscaping firm recommends discontinuing initial establishment maintenance.

6.3 Alternative Surface Materials

Property owners may prefer an alternative surface than sod (or prefer different treatments for different areas of the yard). The alternative treatment options include a layer of gravel, mulch, or seeding a lawn with an alternative seed mix like clover. Multiple site visits have been completed by GSI and DEQ to discuss alternative options. The areas recommended for alternative surface materials are shown on the individual Scope Memorandum included in Appendix B.

6.3.1 Gravel

A property owner may elect to have 6 to 12 inches of gravel installed at the surface instead of soil and vegetation. In this scenario, the gravel will be installed by the EC that removed and imported soil. The gravel will be ¾"-inch minus in size or similar grade typically used for gravel roadways. In areas receiving gravel backfill, a minimum 8-ounce non-woven geotextile will be installed over the exposed soil prior to imported gravel.

The gravel will be imported and installed using the same lift and compaction methods as described for clean soil. The imported gravel will be compacted to a non-yielding state by the EC using a roller or vibratory plate compactor. Installed gravel will not require ongoing BMPs after it is installed. Maintenance will be the responsibility of the property owner or tenant.

6.3.2 Mulch

A property owner may not want a sod lawn or gravel surface on their property. In these cases, the RA can be completed with a mulch and bark dust layer of no less than 2 inches in thickness. The property owner will then be responsible for maintenance, as necessary.

6.3.3 Specialty Seed

A property owner may want a specialty seed mix, such as clover. In these cases, the RA will be completed by broadcast seeding at the rate specified on the product. Bonded fiber matrix, tackifier, and fertilizer will be applied with the seed mix prior to installation to prevent erosion. BMPs (i.e., straw wattles) along the perimeter of the DU may be required by the Erosion Prevention Permit to prevent soil from leaving the property. Following the initial establishment of BMPs, wetting of the yard, and one follow-up watering period, maintenance and establishment of seed will become the responsibility of property owner or tenant.

SECTION 7: Decontamination and Investigation-Derived Waste Management

Decontamination procedures will be implemented to prevent unintended contact with contaminated soil removed during RA activities. IDW generated during RAs will also be appropriately managed, if they are unable to be contained within the DU.

7.1 Decontamination

To prevent contamination of areas outside of the DUs, equipment will be brushed off after excavating the contaminated soil. The brushed off soil will be collected and added to the stockpile or dump truck. If dry decontamination techniques are unsuccessful at gross decontamination, the equipment will be decontaminated by power washing prior to leaving the site. This decontamination water will be contained within the excavation footprint and allowed to infiltrate prior to backfilling. If soil from the RA is tracked onto the street, the EC will be prepared to sweep or wash dirt back to the DU. All decontamination for a DU will be completed (and decontamination waste placed back in the DU) prior to commencing the backfilling activities. The EC will also sweep streets at the end of each workday, as necessary (this may be completed by a commercial street sweeper). Swept material will be disposed with other contaminated soil unless backfilling has already occurred (towards the end of the RA), in which case swept material may be disposed as standard municipal solid waste.

7.2 Investigation-Derived Waste Management

IDW will consist of excavated contaminated soil, decontamination water (if not maintained in the excavation footprint), and PPE. Excavated contaminated soil will be placed into trucks for transport for disposal at a Subtitle D landfill as described in Section 5.4. Any decontamination water that cannot be contained within the excavation footprint will be collected and added to the contaminated soil for offsite disposal. PPE generated during RA implementation will be disposed offsite as solid waste.

SECTION 8: Communication Plan

This section presents a Communication Plan for the planned offsite RA activities near the Facility. The purpose of this plan is to establish and facilitate the flow of communication between engaged parties for the benefit of successful completion of RAs at offsite properties. The plan describes the parties involved, their responsibilities or roles, the lines of communication, and documentation of communications.

8.1 Project Organization

The project involves completion of RAs to reduce risks to people and the environment by removing surficial soil at offsite residential properties with PCDD/F contamination above the early action CUL. As described below, DEQ and its Project Team will implement the RAs and, in doing so, will and may interact with various community members.

8.1.1 Project Team

The Project Team consists of regulatory agencies, DEQ's contractor (GSI), and subcontractors tasked with implementing RAs at affected offsite properties. This Communication Plan will be provided to representatives of each member of the Project Team before implementing RA activities. A contact list with the names and contact information for Project Team members will be completed and distributed to each representative to facilitate communication. Project Team representatives and their responsibilities are presented below.

Oregon DEQ Project Manager. DEQ is the lead agency implementing the RA. DEQ's Project Manager will be the key communications Project Manager for the RA. They will be responsible for overseeing performance of the RAs, providing assistance in problem resolution and technical matters, approving changes in scope and/or cost of RA implementation, interacting with members of the community (outreach/responding to questions from the public), and review of project deliverables. For outreach activities, they will work closely with the DEQ Public Affairs Specialist and the Cleanup Program Manager. In preparing for the RA on a given property, the DEQ Project Manager (or assigned DEQ staff) will be responsible for gaining access to the property from the property owner and tenant, if applicable, and scheduling with them when the RA activities will occur. As the EPA is also involved, DEQ will interact with EPA personnel and keep them informed of the progress of the project.

Oregon DEQ Task Order Manager. The DEQ's Task Order Manager assists the DEQ Project Manager and is responsible for helping to administer the Task Order, and approving changes in scope and/or cost during RA implementation. The DEQ Task Order Manager has the same authority for oversight and decision-making as the DEQ Project Manager.

Oregon DEQ Field Representative. DEQ may occasionally have a Field Representative(s) present to observe RA activities. As authorized by the DEQ Project Manager, the DEQ field representative may provide guidance and approval for minor field decisions (e.g., shrub removal) to GSI; additionally, the Field Representative may discuss the RA activities with the property owner/tenant, the public, and the media.

GSI Task Order Manager. GSI is currently DEQ's lead contractor on this project. The GSI Task Order Manager, with support of other senior GSI staff, will maintain primary responsibility for project quality, schedule, and budget; manage and coordinate field staff; provide technical advice to field staff during RA implementation; request approval of scope and/or budget changes from the DEQ Project Manager; and provide review of project deliverables. The GSI Task Order Manager will also address issues, scope interpretation, and concerns from the EC, with concurrence with the DEQ Task Order Manager or Project Manager, as needed. If a health and safety incident occurs, the GSI Task Order Manager will contact and involve GSI's Health and Safety Officer to implement and document any necessary actions.

GSI Field Staff. One field representative from GSI will be present at all times during field activities for the RA. The field representative will be responsible for observing and documenting field activities and subcontractor adherence to their contracted scope of work; coordinating with and providing guidance to subcontractors; keeping the community out of the work area for their safety; and conducting tailgate health and safety meetings at the beginning of each field day. If necessary, the field representative will contact the property owner/tenant via phone to discuss preservation of yard features and the status of the RA on their property. For safety considerations, owners/tenants will be advised to remain offsite during the entirety of the RA. The representative will also convey any issues, concerns, inquiries, incidents, and scope changes to the GSI Task Order Manager, DEQ Project Manager, and/or DEQ field representative, as appropriate.

DEQ Public Affairs Specialist. DEQ's Public Affairs Specialist assists the DEQ Project Manager and other senior managers with public involvement and is typically the primary point of contact for news media inquiries.

Subcontractors. Subcontractors for the RA will be subcontracted to GSI and will include an arborist, vegetation removal firm, and earthwork firm (with likely second-tier private utility locator, surveyor, landscape, and possible utility and/or fencing subcontractors). Each subcontractor will be responsible for completing the scope of work for which they have been contracted. Subcontractors will report directly to GSI Field Staff and GSI Task Order Manager. The EC will be responsible for delineating the work area to limit access and may assist in keeping the community out of the work area for their safety.

8.1.2 Community Representatives

Representatives of the Project Team may or will be interacting with members of the community. For their safety, all community members (including property owners/tenants) must not enter the work zone established by the EC. Known or potential community members are as follows:

- **Property Owner/Tenant.** RA activities will be conducted on primarily residential properties. Temporary offsite housing will be provided for residents within DUs if they choose to accept it. DEQ is recommending residents stay off site during the RA to minimize potential interactions or safety factors during earthwork. Utilities may also be impacted during earthwork and to complete the RA efficiently, the EC may not be able to reconnect utilities until earthwork is complete. However, residents will be allowed to access or stay on their property during RA activities if they wish to do so. In these cases, GSI, DEQ, and the EC will coordinate and communicate site activities that will affect access to and from the residences and any obstruction of utilities that may occur.

DEQ will coordinate closely with the residents prior to, during, and after the cleanups are complete.

- **General Public.** The general public will likely consist of neighbors but can include anyone not associated with implementation of RA activities. Any inquiries made by the general public should be directed to DEQ's Public Affairs Officer and/or the DEQ Project Manager.
- **Media.** Local newspaper personnel or news channel outlets may visit offsite properties during RA activities. Any media inquiries should be directed to DEQ's Public Affairs Officer and/or the DEQ Project Manager.

8.2 Lines of Communication

The following narrative provides explanations and examples of communication that are to be followed during RA:

- **DEQ Project Manager.** The DEQ Project Manager or the DEQ Task Order Manager will be the primary contact for its Field Representative, GSI Task Order Manager (as well as GSI Field Staff), the property

owner/tenant, and other community members. Any inquiries by the general public or the media will be directed to the DEQ Project Manager.

- **DEQ Field Representative.** The DEQ Field Representative will report directly to the DEQ Project Manager. He/she may converse with the community representatives and the GSI field representative, but any advice or decisions are non-binding unless approved by the DEQ Project Manager or Task Order Manager in writing. Conversations with the general public shall be limited to the general purpose of the RA (e.g., removal of contamination) and listening to concerns from the property owner/tenant (any significant concerns must be relayed to the DEQ Project Manager). Any media inquiries will be directed to the DEQ Project Manager.
- **GSI Task Order Manager.** The GSI Task Order Manager reports to the DEQ Project Manager and is the primary authority to Contractor Field Staff and subcontractors. Information provided to the Contractor Manager by Contractor Field Staff will be evaluated with any changes or decisions made with concurrence from the DEQ Task Order PM or Project Manager before being passed to GSI Field Staff and subcontractor for implementation. The DEQ Task Order PM or Project Manager may also provide guidance to GSI Field Staff in the implementation of the RA.
- **GSI Field Staff.** GSI Field Staff may direct subcontractors in the execution of their work as specified in their respective subcontract. Field Staff may interact with the DEQ Field Representative to discuss project scope and converse with the general public in a manner similar to the DEQ Field Representative. Field Staff will also communicate with the property owner/tenant regarding features to be protected and preserved; this communication will be documented as indicated below and reviewed by the GSI Task Order Manager and DEQ Project Manager or Task Order PM for concurrence. Any significant general public or media inquiries will be directed to the DEQ Project Manager.
- **Subcontractors.** Subcontractors will be subcontracted to GSI and will report directly to GSI.

8.3 Communication Documentation

To be binding, all communications regarding agreements, approvals, and decisions on deviations of scope and costs for RA components must be documented in writing. Additionally, pertinent conversations with community representatives must be recorded in field notebooks. Communications to be documented include, but are not limited to, the following:

- Access agreements between DEQ and property owners.
- Property features to be protected and preserved.
- Subcontractor changes in scope and cost presented to GSI, with approval by DEQ.
- Discussions with property owners/tenants regarding RA activities.
- Inquiries by the general public and the media.
- Direction to Field Staff regarding scope based on subcontractor agreements.
- Deviations from this Work Plan.
- Selection of sod and/or alternative surface treatments as desired by the property owner.

Communications shall be documented in email or field notebooks, as appropriate. Emails will be saved in the project folder on GSI's server. Field notebooks will be scanned after the field activities, with the electronic files stored on the server. Field activities will be summarized in a daily email from the GSI Field Staff to the GSI Task Order Manager, who will review and subsequently transmit the email to DEQ.

SECTION 9: Reporting

Following each RA event, GSI will prepare an RA Summary Report describing the activities completed. The report will present a brief description of previous investigation results specific to each DU that underwent an RA, the purpose and objectives of the RA, and the RA activities completed. Appendices to the RA Summary Report will include a photograph log of RA activities completed for each DU and soil disposal receipts (e.g., weight tickets from the landfill), a copy of the sod or grass seed maintenance instructions and/or grass seed, gravel, or bark mulch agreements, as appropriate. A summary of the RA activities completed on each DU will be provided to the residence and/or property owner of the DU.

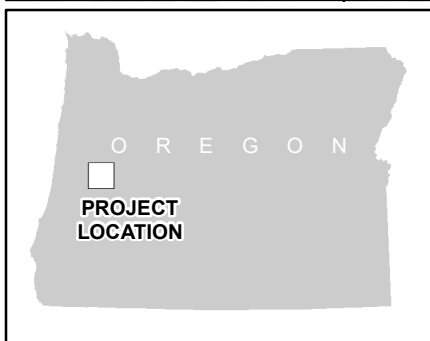
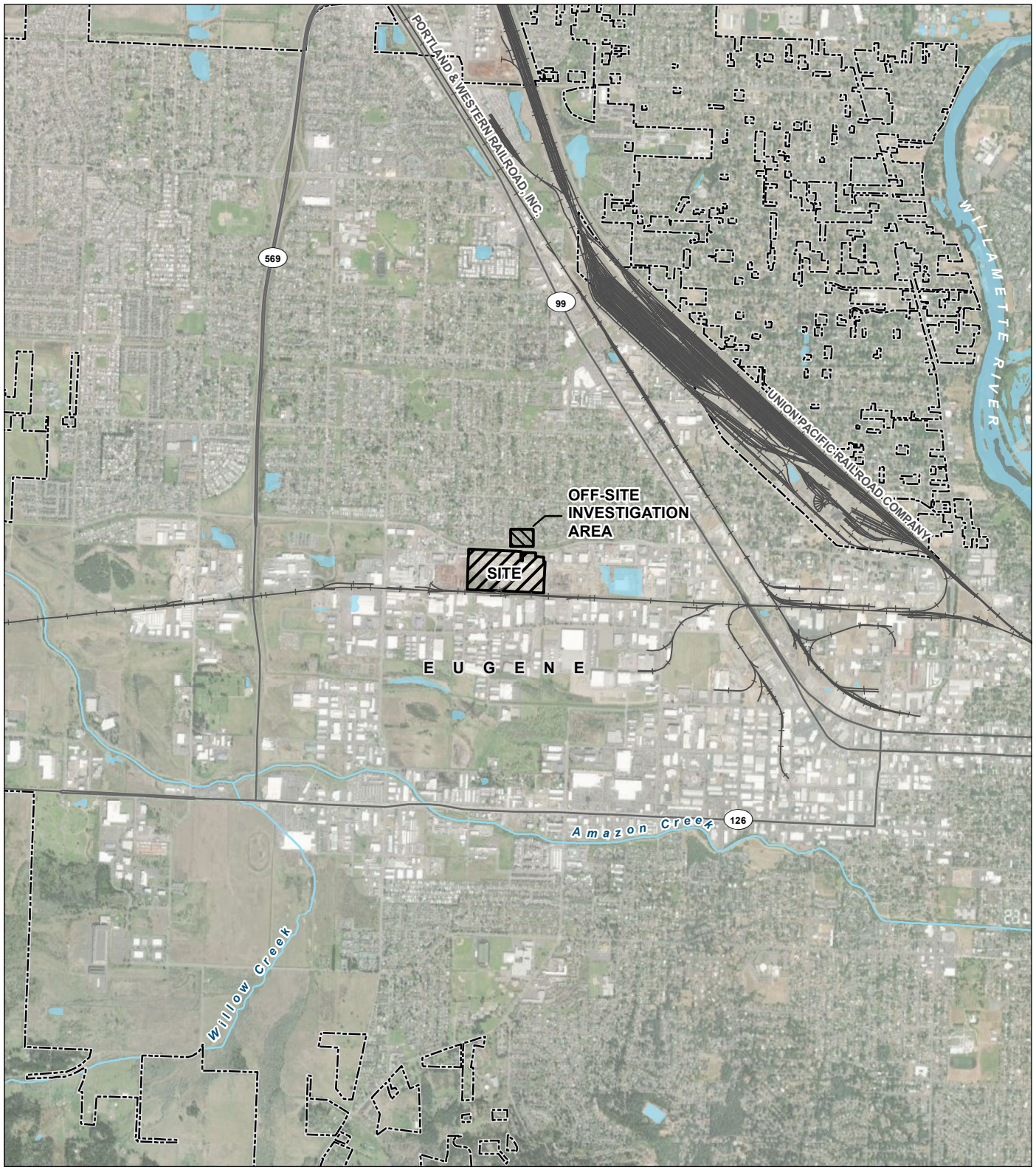
SECTION 10: Schedule

Implementation of an RA at a given property will be dependent on the availability of the EC and backfill/topsoil source. Once these things are known, DEQ will coordinate with the property owners/tenants to agree to the start date for the RA. After utility locates have been conducted, the excavation contractor will begin work. Excavation work is anticipated to take 2 to 3 days per property depending on the size and depth of the DU being excavated, accessibility, and the degree to which features are to be protected. Property restoration will occur within a few days following backfilling.

SECTION 11: References

- DEQ. 2019. Record of Decision for J.H. Baxter & Co. Facility, Eugene, OR, ESCI #55. Oregon Department of Environmental Quality, Western Region Office. October 2019.
- DEQ. 2022. Request for Orphan Site Designation – JH Baxter & Co – Eugene. Oregon Department of Environmental Quality, Western Region Office. February 2022.
- DEQ. 2023. Risk-Based Concentrations for Individual Chemicals Excel Spreadsheet. Prepared by the Oregon Department of Environmental Quality, Environmental Cleanup Program. June 2023.
- GSI. 2020. Technical Memorandum – Draft Final, Off-Site Soil Sampling Investigation. Prepared by GSI Water Solutions, Inc. September 3, 2020.
- GSI. 2022. Offsite Investigation Work Plan. Former JH Baxter & Co. Facility, Eugene, Oregon, ECSI No. 55. Prepared by GSI Water Solutions, Inc. June 6, 2022.
- GSI. 2023. Offsite Investigation Report. Former JH Baxter & Co. Facility, Eugene, Oregon, ECSI No. 55. Prepared by GSI Water Solutions, Inc. June 26, 2023.
- OHA. 2023. Final JH Baxter Health Consultation. Prepared by the Oregon Health Authority. February 27, 2023.
- PES. 2010. *Remedial Investigation Summary Report*. Revision 1. Prepared by J.H. Baxter & Co. and Premier Environmental Services, Inc. March 10, 2010.

Figures



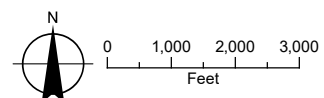
LEGEND

- City Boundary
- Railroad
- Major Road
- Watercourse
- Waterbody

Date: January 10, 2023
 Data Sources: BLM, ESRI, ODOT,
 USGS, Maxar Imagery (2021), City of Eugene

FIGURE 1

Site Vicinity Map
 Former JH Baxter & Co. Facility
 Offsite Removal Action Work Plan
 Eugene, OR





LEGEND

- Decision Unit
- Surface Soil Removal Depth**
- 6-inch
- 12-inch
- 18-inch
- 24-inch

FIGURE 2
Surface Soil Removal Action Depths
 Former JH Baxter & Co. Facility
 Offsite Removal Action Work Plan
 Eugene, OR

Date: July 24, 2023
 Data Sources: BLM, ESRI, ODOT,
 USGS, Aerial Photo 2019, City of Eugene

