

WORK PLAN

Amy's Kitchen – Medford Facility Soil Cap

INTRODUCTION

This work plan describes the objectives, procedures, and methods for placement of a soil cap on a portion of the Amy's Kitchen facility located at 441 W. Antelope Road in White City, Oregon (Figure 1). The Amy's Kitchen property includes an organic food preparation plant, associated parking lots, infrastructure, and undeveloped land.

As detailed below, the plant site was developed by Amy's Kitchen in two phases that were completed in 2005 and 2014. Prior to development, buried waste debris was discovered on the site and the adjacent Whetstone Landfill. While much of the waste debris was removed from the Amy's Kitchen site and consolidated in the Whetstone Landfill in 2005 and 2014 (during development), buried waste remains in the east and northeast sections of the Amy's Kitchen site (Figure 2).

No additional phases of site development are currently planned. Condition 1.J.1 of a 2005 Prospective Purchasers Agreement (PPA) between the Oregon Department of Environmental Quality (DEQ) and a subsidiary of Amy's Kitchen (Table Rock Group, LLC) requires that:

Upon completion of the site development, the area of the Property where debris previously has been landfilled will be covered by buildings, pavement, or 12 inches of clean soil (existing overburden or clean soil from the Property or soil imported from offsite).

Placement of a soil cap, preparation of a cap maintenance plan by Amy's Kitchen, and DEQ review and approval of the cap and maintenance plan are the final actions required for DEQ to issue a Certificate of Completion for the PPA.

This work plan summarizes the approach for the placement of the soil cap. Specific tasks include:

1. Confirmation of Waste Debris Extent
2. Cap Design
3. Permitting
4. Cap Placement
5. DEQ Coordination and Reporting

BACKGROUND

Regulatory History

The Amy's Kitchen facility was constructed in 2005 adjacent to a brownfield site known as the Whetstone Site under the oversight of DEQ, including the administration of a PPA. As described in the DEQ June 2005 Removal Action Decision (RAD) for the Whetstone Site, the landfill was reportedly used from 1942 through the late 1960s prior to solid waste facility permitting. Debris (typically glass, metal, asphalt, concrete, tires, etc.) associated with the landfill operations were also found to be buried in areas of the Amy's Kitchen property.

Based on the findings of a 2005 Phase I/II Environmental Site Assessment (Parametrix 2005a) and prior investigations, the action identified in the RAD consisted of consolidating all debris excavated during development of the Amy's Kitchen facility onto the Whetstone Landfill. As detailed in the Section 7.0 of the RAD, DEQ determined this action was allowed pursuant to ORS 465-260(2) and OAR 340-122-0070, which indicate the Director (or delegated authority) may approve removal actions necessary to protect human health and the environment. Pursuant to ORS 465.315(3), the Director may exempt removal actions from the Resource Conservation and Recovery Act and solid waste requirements provided they occur "on-site" and are protective of human health and the environment. The determination was applicable to the 2005 and future phases of development on the Amy's Kitchen site.

As required by DEQ, the Construction Soil Management Plan (CSMP) (Parametrix 2005b) and the Landfill Consolidation Plan (LCP) (Parametrix 2005c) were prepared, approved, and included as Attachments E and F to the July 2005 PPA between DEQ and the Table Rock Group, LLC. The CSMP describes methods and procedures to manage soil and debris encountered during construction activities on the Amy's Kitchen portion of the property. The LCP describes methods and procedures for management and consolidation of soil and debris placed on the Whetstone Landfill property.

Site Development

The initial phase of development was completed in 2005 and included the construction of a 137,500-square-foot processing building, 9,200 square feet of warehouse space, 10,000 square feet of office space, an 18,000-square-foot loading dock, the southeast half of the automobile parking area, and associated site improvements. During this phase of the project, approximately 27,000 cubic yards of soil and debris were excavated from the Amy's Kitchen portion of the property and consolidated onto the Whetstone Landfill property.

The second phase of construction was completed in 2014 and included the expansion of the parking area on the Whetstone Landfill property (Figure 1). The project included adding approximately 81,000 square feet of paved parking. In addition to the parking area expansion, soil and fill materials were excavated at the southeast end of the facility to expand the processing facility. Approximately 9,000 cubic yards of soil and waste debris were excavated from this area and placed in the Whetstone Landfill. The landfill reached capacity and was capped in 2014 with a geotextile fabric, 12 inches of crushed rock, and asphalt concrete.

CAP DESIGN, PERMITTING, PLACEMENT, AND REPORTING TASKS

Task 1: Confirmation of Waste Debris Extent

Field investigations will be completed to confirm the extent of waste debris that is not covered by buildings, pavement, or 12 inches of clean soil. The work will include establishing an investigation grid with 70 cells in the areas that, based on the 2005 Phase I/II Environmental Site Assessment, included shallow buried waste debris. Figure 3 includes the investigation grid and the extent of waste debris based on the 2005 Phase I/II Environmental Site Assessment. Field GPS equipment was not readily available in 2005, and the test pit locations were not surveyed. Therefore, the extent of waste debris shown on Figure 3 is approximated.

GPS equipment will be used to field locate the centers of the grid cells. A backhoe will be used to excavate 12-inch-deep test pits in the center of each grid cell. The depths of the test pits and soil conditions will be documented. If debris waste is encountered, the thickness of the clean overburden soil will be documented. Test pits will be backfilled after documenting subsurface conditions. The investigation will continue until the horizontal extent of waste debris that is not covered by buildings, pavement, or 12 inches of clean soil is established. If necessary, additional grid cells will be added or deleted based on field observations.

Task 2: Cap Design

Data collected during Task 1 will be used to develop engineering plans for the placement of clean soil over waste debris that is not covered by buildings, pavement, or 12 inches of clean soil. The plans will include:

1. Areas requiring additional soil to comply with the PPA requirements
2. Thickness of soil to be added to achieve a 12-inch-thick clean soil cap
3. Procedures for stormwater and dust management during soil placement
4. Reseeding requirements

The draft and final plans will be submitted to DEQ for review and approval.

Task 3: Permitting

The project will require the following environmental permits and/or reviews from Jackson County and DEQ:

1. 1200-C Construction Stormwater permit
2. Type 1 Floodplain Review
3. Grading permit

Task 4: Cap Placement

Parametrix will oversee the installation of the soil cap and document the proper placement of soil to achieve a minimum of 12 inches of clean soil over waste debris. The approach for placement of the cap (adding 12 inches of clean soil over the entire area versus adding additional clean soil to the existing cover to achieve the 12-inch cap) will be determined based on the findings from Task 1 (confirmation of the extent of waste debris that is not covered by buildings, pavement, or 12 inches of clean soil).

Task 5: DEQ Coordination and Reporting

Amy’s/Parametrix will coordinate the overall project with DEQ and provide the following documents to DEQ:

1. Draft and final design plans for review and approval
2. Copies of required permits prior to cap placement
3. An updated schedule for the soil cap placement after approval of the design and permits
4. Draft and final soil cap placement reports for review and approval
5. Draft and final cap maintenance plans for review and approval

PROJECT SCHEDULE

The project schedule is summarized in the table below. As previously discussed, the schedule for the soil cap placement will be updated after approval of the design and permits.

Soil CAP Design, Permitting, and Reporting

Task	Target Completion Date
Task 1: Confirmation of Waste Debris Extent	April 2022
Task 2: Cap Design and Approval	July 2022
Task 3: Permitting	August 2022
Task 4: Cap Placement	Q4 2022
Task 5: DEQ Coordination and Reporting	2022/23
DEQ Easement and Equitable Servitude	Q2 2023
DEQ Certification of Completion	June 30, 2023

REFERENCES

Parametrix 2005a. Phase I/II Environmental Site Assessment, Proposed Amy’s Kitchen Site, White City, Oregon. May 12, 2005.

Parametrix 2005b. Construction Soil Management Plan, Proposed Amy’s Kitchen Facility, White City, Oregon. Prepared for Table Rock Group. July 5, 2005.

Parametrix 2005c. Landfill Consolidation Plan, Whetstone Site, White City, Oregon. Prepared from Table Rock Group. July 6, 2005.

FIGURES

- 1 Site Vicinity Map
- 2 Approximate Overburden Thickness
- 3 Investigation Grid

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Parametrix

Data Source: Jackson County
Aerial Source: ESRI (2020)

- Whetstone Landfill Site
- Site Location
- Parcel

Figure 1. Site Vicinity Map
Amy's Kitchen Facility
441 W Antelope Rd
White City, OR 97503



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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Parametrix

Data Source: Jackson County
Aerial Source: ESRI (2020)



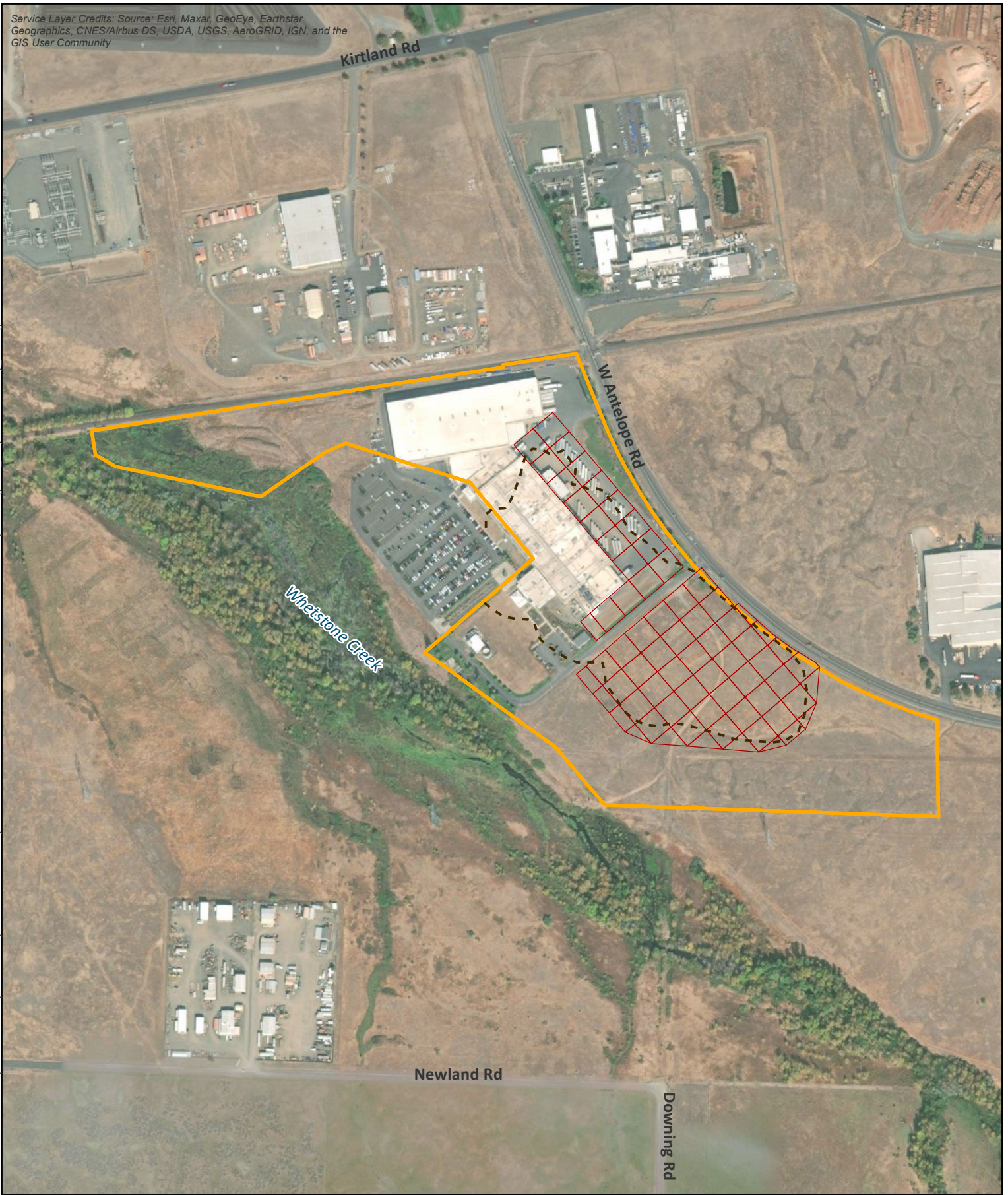
- Approximate Extent of Waste
- Approximate Soil Cover Thickness
- Site Location
- Parcel

Figure 3: Approximate Overburden Thickness

Amy's Kitchen Facility
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White City, OR 97503

Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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Parametrix

Data Source: Jackson County
Aerial Source: ESRI (2020)



- - - Approximate Extent of Waste
- Test Pit Grid (100'x100')
- Site Location
- Parcel

Figure 3: Investigation Grid

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