



## ST HELENS FIBERBOARD FACILITY UPLAND REMEDY

---

### Third Quarter 2022 Progress Report

**To:** Sarah Greenfield, Oregon Department of Environmental Quality  
Katie Daugherty, Oregon Department of Environmental Quality  
Kevin Parrett, Oregon Department of Environmental Quality

**From:** Benjamin Johnson, GSI Water Solutions, Inc.

**CC:** Alan Kidd, Armstrong World Industries, Inc.  
John Ackiewicz, Armstrong World Industries, Inc.  
Ronald Nonamaker, Armstrong World Industries, Inc.  
Joan Snyder, Stoel Rives, LLP  
Laura Kerr, Stoel Rives, LLP

**Attachments:** A – Third Quarter 2022 Upland Cap Inspection Form and Cap Inspection Photo Logs  
B – Site Perimeter Security Inspection Log and Perimeter Security Photo Logs

**Date:** October 11, 2022

---

Dear Mrs. Greenfield,

This progress report summarizes the work performed by Armstrong World Industries, Inc. (AWI) in the third quarter (July through September) and beginning of the fourth quarter (October 3) of 2022 at the former St. Helens Fiberboard Facility (Site) to complete obligations under the June 19, 2019, Consent Judgment between AWI and the Oregon Department of Environmental Quality (DEQ). Progress report requirements are outlined in paragraph 5.H of the Consent Judgment. This progress report summarizes actions that were taken to satisfy ongoing requirements of the Easement and Equitable Servitude (EES) for the Upland Operable Unit (OU) Remedy.

### Actions Taken under the Consent Judgment

Specific actions completed in the third quarter of 2022 included:

- AWI submitted the fourth quarter 2021–2022 Discharge Monitoring Report (DMR) to the Your DEQ Online (YDO) system.
- AWI performed cap maintenance to reduce the infringement of vegetation along the cap boundary, remove deep rooting vegetation from the cap, and delineate the edge of the cap along the Upland OU.

Specific actions completed in the beginning of the fourth quarter of 2022 included:

- AWI completed the second of two biannual cap inspections on October 3, 2022. The cap inspection report and accompanying photo log are attached to this progress report (Attachment A).
- AWI completed a Site Perimeter Security Inspection that was carried out on October 3, 2022. The perimeter security inspection form and associated photos are provided as an attachment to this progress report (Attachment B).

### Third Quarter Sampling Activities

No additional soil, solids, or stormwater sampling was conducted during the third quarter of 2022.

### Problems Encountered during Third Quarter

No problems were encountered during the third quarter of 2022.

### Actions Scheduled for Fourth Quarter 2022

AWI is released from stormwater monitoring requirements under its permit due to the Site's "inactive" status. This status has been verified in the YDO system. The first quarter 2022-2023 DMR will be submitted by November 15, 2022. AWI plans to continue ongoing vegetation management activities on the gravel cap with a focus on keeping blackberries and scotch broom back from the Upland boundary around the treatment facility and southern swale slopes in Cap Inspection Area #2 and to submit the fourth quarter 2022 progress report in January 2023, so long as they are still the Site owner.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,



Benjamin Johnson, RG



**Attachment A**

---

**Third Quarter 2022 Upland Cap Inspection Form and  
Cap Inspection Photo Logs**

# UPLAND CAP INSPECTION FORM

Use this inspection form to document cap inspections. If unacceptable conditions are observed, complete an additional form immediately after repairs are completed.

Inspection Date: 10/13/22 Inspected By: Name: Ben Johnson  
Company: GSI Water Solutions  
Address: 55 SW Yamhill, Ste #200, Portland, OR 97214  
Phone: (503) 679-4543  
Email: bjohnson@gsiwater.com

### Cap Inspection Area 1 (See Figure 8):

1. *Soil and Gravel Cap* – Observe soil and gravel cap surface for ruts, pot holes, subsidence, hydraulic erosion or heaving, unauthorized excavation, and other damage.

Is soil cap in acceptable condition?  YES  NO

If so, attach photographs documenting acceptable conditions.

If no, attach photographs  and describe unacceptable condition:

Location: Area wide  
Condition: Some shrubbed rooted vegetation mostly dead. Edge of cap looks well defined.

Describe any actions taken or repairs to soil and gravel cap conducted since previous inspection:

AWI Cleared vegetation and mounded

All repairs adequate?  YES  NO — Photograph of repair attached

2. *Asphalt and Concrete Pavement* – Observe asphalt and concrete paving for unauthorized excavation and other damage.

Does pavement maintain a protective barrier for underlying soils?  YES  NO

If so, attach photographs documenting acceptable conditions.

If no, attach photographs  and describe unacceptable condition:

Location: \_\_\_\_\_

Condition: \_\_\_\_\_

Describe any actions taken or repairs to pavement conducted since previous inspection:

N/A

All repairs adequate?  YES  NO — Photograph of repair attached

3. *Limited Access Areas* – Observe and inspect any limited access areas as depicted on Figures 7 and 8 in SMP.

Does use of limited access area appear to have changed since last inspection?  YES  NO

If no, attach photographs documenting acceptable low-use conditions and stable soils.

If so, attach photographs  and describe change in conditions:

Location: \_\_\_\_\_

Condition: \_\_\_\_\_

Describe any actions taken within limited-access areas since previous inspection:

Mowing and vegetation management

Have actions helped maintain low-use, stable conditions?  YES  NO — Photograph of action area attached

Additional Notes: Continue vegetation management

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signed:  Date: 10/3/22

**Cap Inspection Area 2 (See Figure 8):**

1. *Soil and Gravel Cap* – Observe soil and gravel cap surface for ruts, pot holes, subsidence, hydraulic erosion or heaving, unauthorized excavation, and other damage.

Is soil cap in acceptable condition?  YES  NO

If so, attach photographs documenting acceptable conditions.

If no, attach photographs  and describe unacceptable condition:

Location: Suble - at treatment plant.

Condition: Good south end of suble and east side of treatment plant black berries and sealed biomass near edges of cap at suble slopes.

Describe any actions taken or repairs to soil and gravel cap conducted since previous inspection:

mowing and vegetation removal

All repairs adequate?  YES  NO — Photograph of repair attached

2. *Asphalt and Concrete Pavement* – Observe asphalt and concrete paving for unauthorized excavation and other damage.

Does pavement maintain a protective barrier for underlying soils?  YES  NO

If so, attach photographs documenting acceptable conditions.

If no, attach photographs  and describe unacceptable condition:

Location: \_\_\_\_\_

Condition: \_\_\_\_\_

Describe any actions taken or repairs to pavement conducted since previous inspection:

N/A

All repairs adequate?  YES  NO — Photograph of repair attached

3. *Limited Access Areas* – Observe and inspect any limited access areas as depicted on Figures 7 and 8 in SMP.

Does use of limited access area appear to have changed since last inspection?  YES  NO

If no, attach photographs documenting acceptable low-use conditions and stable soils.

If so, attach photographs  and describe change in conditions:

Location: \_\_\_\_\_

Condition: \_\_\_\_\_

Describe any actions taken within limited-access areas since previous inspection:

N/A

Have actions helped maintain low-use, stable conditions?  YES  NO — Photograph of action area attached

Additional Notes: Continue vegetation management

Additional Notes: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signed: AK Date: 10/3/22

**Cap Inspection Area 3 (see Figure 9):**

1. *Soil and Gravel Cap* – Observe soil and gravel cap surface for ruts, potholes, subsidence, hydraulic erosion or heaving, unauthorized excavation, and other damage.

Is soil cap in acceptable condition?  YES  NO

If so, attach photographs documenting acceptable conditions.

If no, attach photographs  and describe unacceptable condition:

Location: \_\_\_\_\_

Condition: Good condition

Describe any actions taken or repairs to soil and gravel cap conducted since previous inspection:

viewing and vegetation management

All repairs adequate?  YES  NO — Photograph of repair attached.

2. *Asphalt and Concrete Pavement* – Observe asphalt and concrete paving for unauthorized excavation and other damage.

Does pavement maintain a protective barrier for underlying soils?  YES  NO

If so, attach photographs documenting acceptable conditions.

If no, attach photographs  and describe unacceptable condition:

Location: \_\_\_\_\_

Condition: N/A

Describe any actions taken or repairs to pavement conducted since previous inspection:

All repairs adequate?  YES  NO — Photograph of repair attached.

3. *Limited Access Areas* – Observe and inspect any limited access areas as depicted on Figures 7 and 8 in SMP.

Does use of limited access area appear to have changed since last inspection?  YES  NO

If no, attach photographs documenting acceptable low-use conditions and stable soils.

If so, attach photographs  and describe change in conditions:

Location: \_\_\_\_\_

Condition: N/A <sup>BT</sup> Good Condition

Describe any actions taken within limited-access areas since previous inspection:

Mowing and vegetation management

Have actions helped maintain low-use, stable conditions?  YES  NO — Photograph of action area attached.

Additional Notes: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signed:  Date: 10/3/22

**Cap Inspection Area 1 – Soil and Gravel Cap**



**Cap Inspection Area 1 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 1 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 1 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 1 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 1 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 1 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 1 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 1 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 1 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 1 – Limited Access Areas**



**Cap Inspection Area 1 – Limited Access Areas (cont.)**



**Cap Inspection Area 1 – Limited Access Areas (cont.)**



**Cap Inspection Area 1 – Limited Access Areas (cont.)**



**Cap Inspection Area 2 – Soil and Gravel Cap**



**Cap Inspection Area 2 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 2 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 2 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 2 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 2 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 2 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 2 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 2 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 2 – Soil and Gravel Cap (cont.)**



**Cap Inspection Area 2 – Asphalt and Concrete Pavement**



**Cap Inspection Area 2 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 2 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 2 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 3 – Soil and Gravel Cap**



**Cap Inspection Area 3 – Asphalt and Concrete Pavement**



**Cap Inspection Area 3 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 3 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 3 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 3 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 3 – Asphalt and Concrete Pavement (cont.)**



**Cap Inspection Area 3 – Limited Access Areas**



**Cap Inspection Area 3 – Limited Access Areas (cont.)**



**Cap Inspection Area 3 – Limited Access Areas (cont.)**



**Attachment B**

---

**Site Perimeter Security Inspection Log and Perimeter  
Security Photo Logs**

## PERIMETER SECURITY INSPECTION FORM

Use this inspection form to document perimeter security inspections. If unacceptable conditions are observed, complete an additional form immediately after repairs or modifications are completed.

Inspection Date: 10/3/22 Inspected By: Name: RON NONAMAHER

Company: ARMSTRONG WORLD IND

Address: 1645 RAILROAD AVE, ST. HELENS, OR

Phone: (971) 203-6965

Email: rsnonamaker@armstrongceilings.com

1. *Existing Fencing* – Observe existing integrity of fencing for signs of damage including storm damage, vehicle damage, tree falling on fence, vandalism, etc.

Is facility fencing in acceptable condition?  YES  NO

If so, attach photographs documenting acceptable conditions.

If no, attach photographs  and describe unacceptable conditions:

Location: N/A

Condition: \_\_\_\_\_

Describe any repairs to fencing conducted since previous inspection:

N/A

All repairs adequate?  YES  NO — Photograph of repair attached

2. *Signage* – For areas where fencing is not present, observe posted signage for damage.

Is signage present and does it appear in acceptable condition?  YES  NO

If so, attach photographs (if any) documenting acceptable conditions.

If no, attach photograph  and describe unacceptable condition:

Location: N/A

Condition: \_\_\_\_\_

Describe any repairs to signage conducted since previous inspection:

- REMOVED VEGETATION GROWING IN FRONT OF SIGNS ALONG  
OLD PORTLAND RD AND RAILROAD AVE.

All repairs adequate?  YES  NO — Photograph of repair attached

3. *Unauthorized Entry*— Monitor perimeter and Upland Operable Unit for signs of unauthorized entry.  
Are signs of unauthorized entry present?  YES  NO

If so, attach photographs (if any) and describe evidence of unauthorized entry.

Location: \_\_\_\_\_

Condition: \_\_\_\_\_

Describe any additional actions implemented to prevent unauthorized entry:

- SECURITY PATROLS ALONG NORTH FENCELINE TO SCAPPOOSE BAY.

Do actions appear adequate?  YES  NO — Photograph of repair attached

Additional Notes: SOME MINOR TREE DEBRIS ALONG FENCELINE. ALL WAS  
REMOVED / CLEANED UP. FENCE CONTINUES TO BE IN GOOD SHAPE.  
SIGNAGE CONTINUES TO BE CLEARLY VISIBLE AROUND THE  
PERIMETER. PICTURES ARE INCLUDED TO DOCUMENT THE  
TYPICAL STATE OF PERIMETER.

Signed: \_\_\_\_\_

*Ronald D. Rowland*

Date: \_\_\_\_\_

*10/3/22*

**MAIN ENTRANCE FENCE LINE**



**BUILDING 18 FENCE LINE**



**MAIN ENTRANCE FENCELINE**



**OLD PORTLAND ROAD FENCE LINE**



**NORTHEAST FENCE LINE**



**MAIN ENTRANCE SIGNAGE**



**OLD PORTLAND RD SIGNAGE**



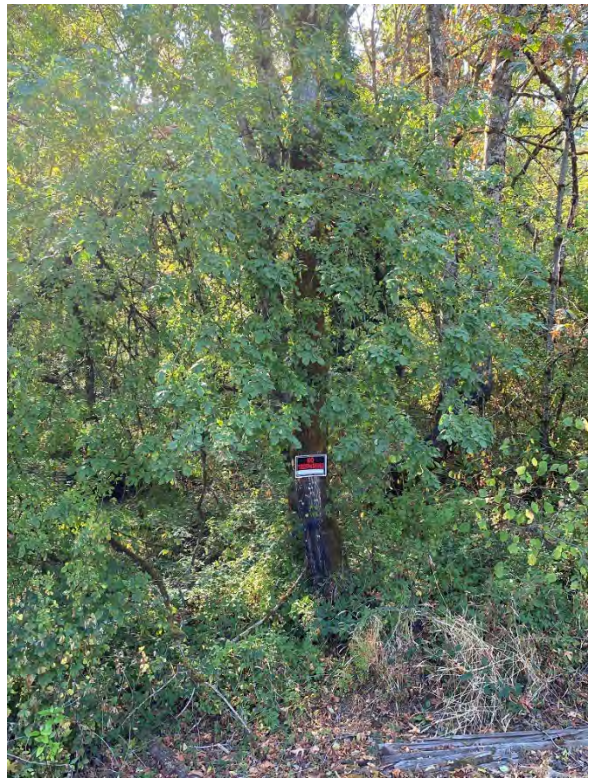
**EAST LOT SIGNAGE**



**OLD PORTLAND RD SIGNAGE**



**RAILROAD AVE SIGNAGE**



SCAPPOOSE BAY SHORE LINE SIGNAGE

