



## ST HELENS FIBERBOARD FACILITY UPLAND REMEDY

---

### First 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:** Melinda Morrison, 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

**Date:** April 6, 2022

---

Dear Mrs. Greenfield,

This progress report summarizes the work performed by Armstrong World Industries, Inc. (AWI) in the first quarter (January through March) 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. In particular, 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 first quarter of 2022 included:

- Since the property sale to Starting Line, LLC was never completed, the National Pollutant Discharge Elimination System (NPDES) 1200-Z permit (#OR0034690) for the Site was transferred back to AWI in a letter from the DEQ sent on February 2, 2022.
- AWI submitted a revised Stormwater Pollution Control Plan (SWPCP) for the Site to DEQ through the Your DEQ Online (YDO) system on April 3, 2022.
- AWI submitted Discharge Monitoring Reports (DMRs) to the YDO system for 3Q2021 (which had not been submitted due to the pending property sale) and 1Q2022.
- 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.

- AWI completed the first of two biannual cap inspections on March 24, 2022 with Sarah Greenfield from the DEQ onsite for a portion of the inspection. The inspection report and accompanying photo log are attached to this first quarter progress report.

### First Quarter Sampling Activities

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

### Problems Encountered during First Quarter

No problems were encountered during the first quarter of 2022.

### Actions Scheduled for Second Quarter 2022

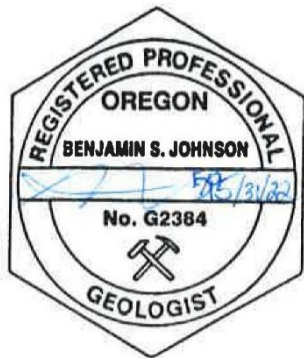
AWI is released from stormwater monitoring requirements under the new permit due to the Site's "inactive" status. This status has been verified in the YDO system. AWI does plan to continue ongoing vegetation management activities on the gravel cap with a focus on keeping blackberries back from the Upland boundary in Cap Inspection Area #1 and to submit the second quarter 2022 progress report in July, 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, R.G.



# 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: 3/24/22 Inspected By: Name: Ben Johnson

Company: GSI Water Solutions

Address: 55 SW Yamhill, Ste #200, Portland, OR 97204

Phone: 503-674-4543

Email: bjohnson@gsws.com

## Cap Inspection Area 1 (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: The gravel cap is in good condition throughout area #1. Some invasive weeds are encroaching on the gravel cap near the sand test pile. Moss present on asphalt.

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

AWI cleared vegetation from the cap, reestablished the cap boundary, and knocked back blackberry. More vegetation management needed near sand test pile.

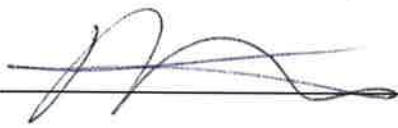
All repairs adequate?  YES  NO — Photograph of repair attached

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.

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



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

3/24/22

**Cap Inspection Area 2 (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: Native and invasive grasses present in upper portions of cap.

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

AWI cleared larger deep rooting vegetation.

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.

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

Signed:  \_\_\_\_\_ Date: 3/24/22

**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, some g-r-sses.  
\_\_\_\_\_  
\_\_\_\_\_

Describe any actions taken or repairs to soil and gravel cap conducted since previous inspection:  
N/A  
\_\_\_\_\_  
\_\_\_\_\_

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

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

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

Signed:  Date: 3/24/22

**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.)**



Vegetation management may be needed in this area to prevent encroachment on the cap.



**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 – Limited Access Areas**



**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 – 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 – Limited Access Areas**



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



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

