



ST HELENS FIBERBOARD FACILITY UPLAND REMEDY

Fourth 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: Andrew Davidson, 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: January 15, 2022

Dear Mrs. Greenfield,

This progress report summarizes the work performed by Armstrong World Industries, Inc. (AWI) in the fourth quarter (October – December) 2021 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 Consent Judgment

Specific actions completed in the fourth quarter 2021 included:

- By email dated August 23, 2021, DEQ approved the inactive status of the Site and granted a waiver releasing AWI from requirements to submit a revised SWPCP under the newly issued 1200-Z permit effective as of July 1, 2021.
- A sale of the property was anticipated in the fourth quarter of 2021, but did not occur. As part of the anticipated sale of the property, DEQ approved of a transfer of AWI's NPDES 1200-Z permit to Starting Line, LLC, the anticipated buyer. On December 14, 2021, AWI submitted a permit transfer request to DEQ requesting the transfer of the NPDES 1200-Z permit for the site back to AWI.
- AWI completed the second of two biannual cap inspections on December 14, 2021. The inspection report and accompanying photo log are attached to this fourth quarter progress report. AWI completed the annual perimeter security inspection the following day on December 15, 2021. The perimeter security inspection form and associated photos are provided as an attachment to this document.

Fourth Quarter Sampling Activities

No additional soil, solids, or stormwater sampling was conducted during the fourth quarter.

Problems Encountered during Fourth Quarter

No problems were encountered during the fourth quarter.

Actions Scheduled for First Quarter 2022

After confirmation from DEQ of AWI's NPDES 1200-Z permit transfer request, AWI will retroactively submit a discharge monitoring report for the first stormwater quarter of the new permit. However, AWI is released from stormwater monitoring requirements under the new permit so long as it retains its inactive status. Daria Gneckow, the DEQ PM previously in charge of monitoring AWI's permit will be passing off duties to Mike Kennedy at DEQ, and has documented the status of the permit transfer and AWI's non-operational status in an email dated December 22, 2021 (see attached email). AWI also anticipates completing the first of two biannual cap inspections in March 2022.

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

Sincerely,



Andrew Davidson, P.E.



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: 12/4/21 Inspected By: Name: Andrew Davidson
Company: GSI Water Solutions, Inc.
Address: 55 SW Yamhill St, Suite 200, Portland, OR 97204
Phone: 971-200-8535
Email: adavidson@gsiws.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 condition of the gravel cap remains good in all portions of cap inspection area 1, but invasive weeds have established in some areas of the cap, particularly along the Upland/Lowland Boundary.

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

AWI should take more action in the next quarter to control weed growth on the gravel.

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:

None taken. Cracks in existing pavement continue to be monitored. Cracks do not appear to have changed since monitoring began in 2019, and do not yet warrant repair.

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:

None taken

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

Additional Notes: _____

Signed: Andrew Davidson Date: 12/14/21

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 weeds continue to be present in upper few inches of gravel throughout the cap, and particularly along the Upland/Lowland boundary.

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

AWI should take more action in the next quarter to control weed growth on the gravel.

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:

None taken

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:

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

Additional Notes: No limited access areas present within cap inspection area 2.

Signed: Andrew Davidson Date: 12/14/21

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: _____

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

None taken

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:

None taken. Existing asphalt pavement in good repair,
and small cracks do not yet warrant any action.
Will continue to monitor.

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:

None taken

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

Additional Notes: _____

Signed: Andrew Davichon Date: 12/14/21

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 – 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 – 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 – 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 – Limited Access Areas



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



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



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



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



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



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: 12/15/21 Inspected By: Name: RON NONAMAKER

Company: ARMSTRONG WORLD IND., INC.

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:

MINOR CLEARING OF DEBRIS OR FALLEN LIMBS.

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:

N/A

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: N/A

Condition:

Describe any additional actions implemented to prevent unauthorized entry:

N/A

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

Additional Notes: OVERALL NO MAJOR CHANGES SINCE LAST INSPECTION.

FENCING AND SIGNAGE REMAIN IN GOOD SHAPE AND CONTINUE

TO SERVE WELL AS A DETERRENT TO UNAUTHORIZED ENTRY.

Signed: 

Date: 12/15/21

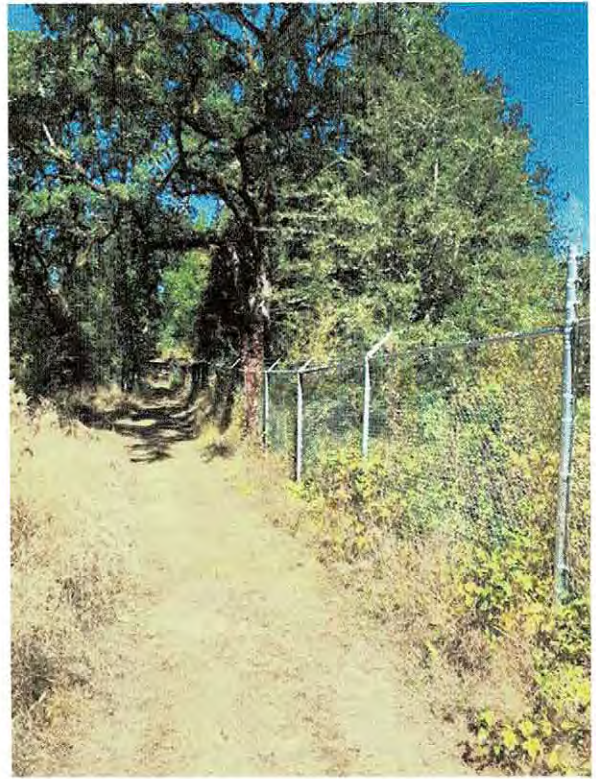
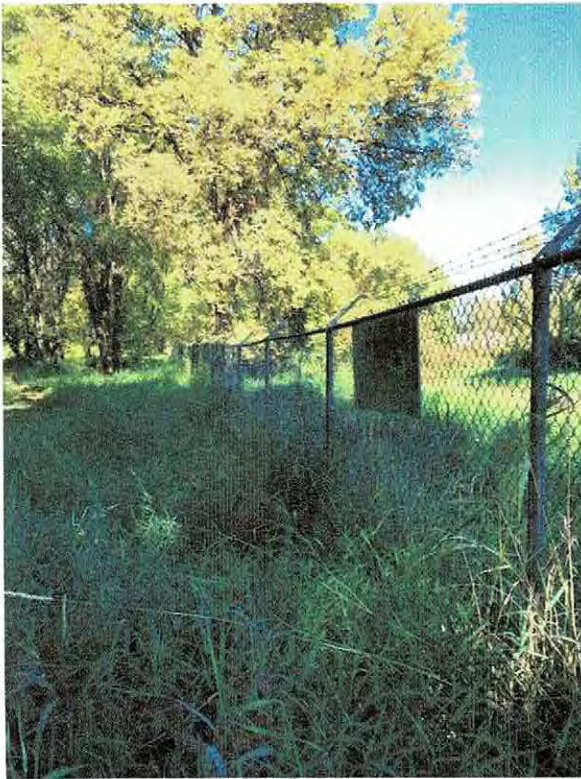
MAIN ENTRANCE FENCE LINE



OLD PORTLAND RD FENCE GATE



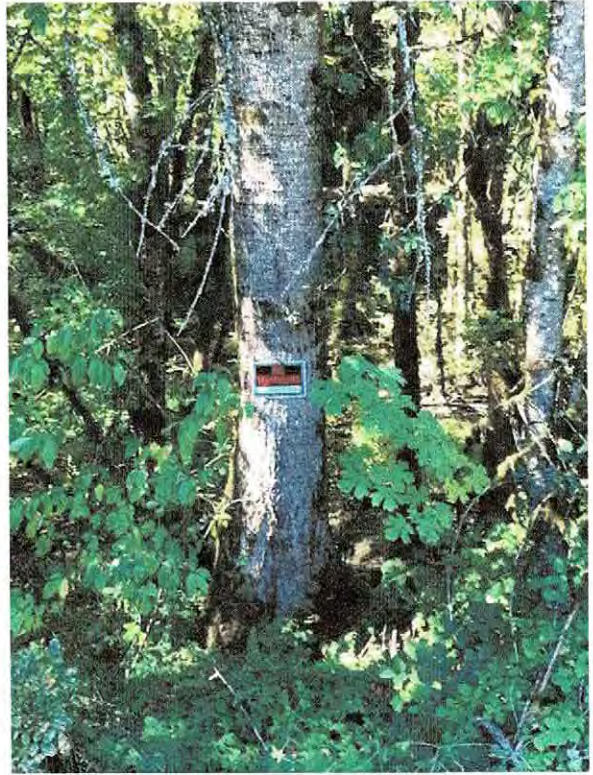
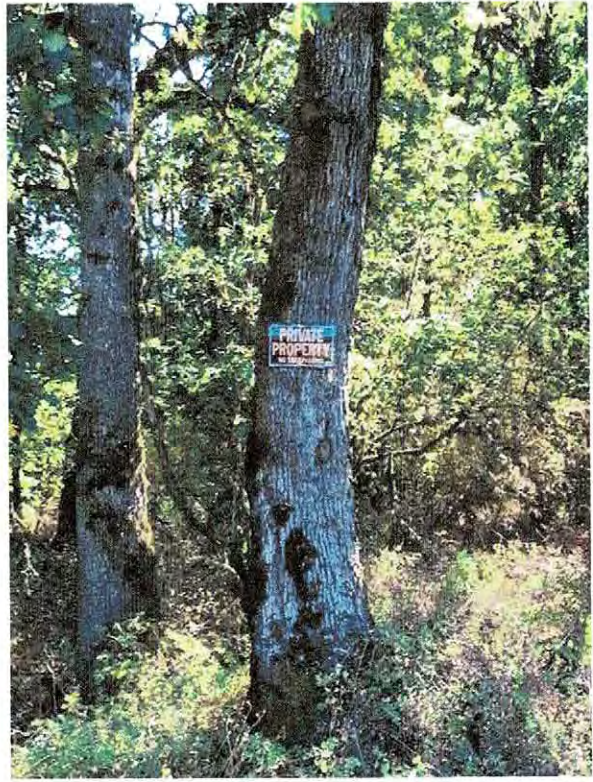
NORTH PROPERTY LINE FENCE



SIGNAGE / POSTINGS



SIGNAGE / POSTINGS (CONT'D)



From: [GNECKOW Daria * DEQ](#)
To: [Andrew Davidson](#); [KENNEDY Mike * DEQ](#)
Subject: RE: DEQ File No. 106061 - 1200Z Permit Transfer Request
Date: Wednesday, December 22, 2021 1:48:13 PM

Thanks for the call, Andrew. I am making sure to connect you w/ Mike so we can have a successful hand-off.

For Mike:

Armstrong is in non-operational status and has been for a long time, therefore they do not collect stormwater samples. Recently, Armstrong's coverage was transferred to a prospective purchaser (Starting Line) but the sale did not go through. Starting Line recently submitted a permit transfer form, transferring coverage back to Armstrong. The transfer will likely not be completed until the first week of January.

I have advised Andrew Davidson (Armstrong's consultant) to register as an RO in YDO asap and to complete the Nov 15 DMR after the transfer is complete. Please track this w/in our internal tracking system.

Thanks,
Daria

From: GNECKOW Daria * DEQ
Sent: Tuesday, December 21, 2021 2:14 PM
To: SEVEN Jenni * DEQ <jenni.seven@deq.state.or.us>; rsnonamaker@armstrongceilings.com; John A. Ackiewicz <jaackiewicz@armstrongceilings.com>
Cc: adavidson@gsiws.com; KENNEDY Mike * DEQ <mike.kennedy@deq.state.or.us>
Subject: FW: DEQ File No. 106061 - 1200Z Permit Transfer Request

Jenni, please let the folks on this email know when this transfer is complete.

After the transfer, **Ron and John**:

Please make sure the Responsible Official (RO) registers in YDO and links to this permit. This will then allow the RO to access and submit the Discharge Monitoring report that was due November 15, 2021 and the upcoming DMR due 2/15/2022. *(DEQ is no longer accepting paper DMRs, the DMR must be submitting through an RO YDO account. When submitting the DMR, use NODI code "**2 – Operation Shutdown" since the facility is inactive).*

Here are some additional resources:

[YDO Portal – Register here](#)

[Registration Fact Sheet for Stormwater – account types](#)

[Complete guide to Registering in YDO](#)

[See page 116 for how to complete and submit stormwater DMRs in YDO](#)

NOTE to **all**: My last day in the stormwater program is next Thursday, so if you need assistance after

that, please contact Mike Kennedy (cc'd).

Thanks,

Daria Gneckow | Water Quality Specialist

Oregon Department of Environmental Quality

Northwest Region

700 NE Multnomah St. Ste 600 Portland, OR 97232

503.229.6855 *desk*

503.437.5074 *mobile*

gneckow.daria@deq.state.or.us

From: Chase, Crystal S <crystal.chase@stoel.com>

Sent: Tuesday, December 14, 2021 4:20 PM

To: GNECKOW Daria * DEQ <daria.gneckow@deq.state.or.us>

Cc: Kerr, Laura <laura.kerr@stoel.com>; Moore, Steve <steve.moore@stoel.com>; Andrew Davidson <adavidson@gsiws.com>; SEVEN Jenni * DEQ <jenni.seven@deq.state.or.us>; Brooks Foster <bfoster@chenowethlaw.com>

Subject: DEQ File No. 106061 - 1200Z Permit Transfer Request

Dear Ms. Gneckow,

On behalf of Armstrong World Industries, Inc., please see attached correspondence requesting transfer of the 1200-Z permit associated with the above-referenced file. The original and accompanying check are being sent to you via overnight UPS today.

Regards,
Crystal

Crystal S. Chase | Partner

STOEL RIVES LLP | 760 SW Ninth Avenue, Suite 3000 | Portland, OR 97205

Direct: (503) 294-9221 | Cell: (971) 275-2296

crystal.chase@stoel.com | www.stoel.com