PHASE 1 ENVIRONMENTAL SITE ASSESSMENT

OCHOCO LUMBER COMPANY
200 SE COMBS FLAT ROAD
TAX LOTS: TOWNSHIP 15S, RANGE 16E, SECTION 4B - 7200, 7300, 7101, SECTION 4C - 2900
PRINEVILLE, CROOK COUNTY, OREGON 97754

April 18, 2005

Prepared For:

Ochoco Lumber Company
P. O. Box 668
Prineville, Oregon 97754

Prepared By:

Osprey Environmental, LLC
115 NW Oregon Street, Suite 4
Bend, Oregon 97701

Project Number O002-1

OSPREY Environmental, LLC

April 18, 2005

Bruce Daucsavage
Ochoco Lumber Company
P. O. Box 668
Prineville, Oregon 97754

Re: Phase I Environmental Site Assessment
Ochoco Lumber Company
200 SE Combs Flat Road
Tax Lots: Township15 S, Range 12 E, Section 4B - 7200, 7300, 7101, Section 4C - 2900
Prineville, Crook County, Oregon 97754

Dear Mr. Daucsavage:

We are pleased to present this report of our Phase I Environmental Site Assessment for the subject property.

We greatly appreciate this opportunity to provide our services to you. Should you require additional information, or have any questions regarding this report, please do not hesitate to call us at (541) 382-6775.

Sincerely,

Osprey Environmental, LLC

Dan Capozzola
Project Environmental Specialist

Catherine Rhode, R.G.
Project Geologist

115 NW Oregon St. #4, Bend, Oregon 97701 ●Phone(541) 382-6775 ●Fax (541) 388-2930 ●dcapozzola@aol.com

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PHASE 1 ENVIRONMENTAL SITE ASSESSMENT
OCHOCO LUMBER COMPANY
200 SE COMBS FLAT ROAD
TAX LOTS 151604B00-7200, -7300, -7101, 151604C00-2900
PRINEVILLE, CROOK COUNTY, OREGON 97754

1.0 Executive Summary

The following conclusions are based on Osprey Environmental, LLC's investigation of the subject property which included review of current and historical property use, environmental records research, and site observations conducted during the Phase I Environmental Site Assessment.

The subject property is located at 200 SE Combs Flat Road in Prineville, Crook County, Oregon. The property consists of tax lots 151604B00-7200, -7300, 7101, and 151604C00-2900 in Township 15 South, Range 16 East, Section 4. The approximately 76.14 acre property was formerly a lumber mill and is currently in the process of redevelopment for commercial and possible residential uses. All mill buildings, except the main office, have been demolished with the concrete foundations remaining. The property is bordered to the north by Ochoco Highway (3rd Street), beyond which are a gasoline station and commercial developments, to the west by SE Combs Flat Road (Paulina Highway) beyond which is residential properties and a day care facility, to the east by residential properties, and to the south by Hylton Lane beyond which are residential properties. The surrounding area consists of a school, residential, and commercial properties.

Historical research indicates that the subject property was developed as Ochoco Lumber Company in 1938. The mill was used for sawing logs, drying and planing lumber. No wood treatment or veneer operations were conducted at the property. The mill closed in 2001. Residences had been present on the northerly portion of the subject property along Highway 26 from the late 1940s through at least 1974.

Historical research on surrounding properties indicates rural residential development began in prior to 1943. A petroleum bulk plant was operated at the northeast corner of SE Combs Road and Highway 26 from about 1935 until 1981 and a service station since the 1930s. A school has been present westerly of the subject property since the 1960s. A large commercial shopping area has been present northwesterly of the subject property since the 1990s.

Review of federal, state, and local environmental records revealed the following:

- The following Environmental Protection Agency (EPA) databases were reviewed for the Phase I Environmental Site Assessment: National Priorities List (NPL); Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS); and Resource Conservation and Recovery Act (RCRA) Treatment Storage and Disposal Facilities List (TSD), RCRA Hazardous Waste Generator List, and Emergency Response Notification System List (ERNS). No listed sites were revealed to be located within the ASTM specified search radii on any of these databases.

- The following Department of Environmental Quality's (DEQ) databases were reviewed for the Phase I Environmental Site Assessment: DEQ Underground Storage Tanks (USTs), Solid Waste Facility database, and the State Fire Marshal's hazardous material incident database. No listed sites were revealed to be located within the ASTM specified search radii on any of these databases.

- Review of the current DEQ Environmental Cleanup Site Information System (ECSI) database indicated that three ECSI sites, including the subject property, are located within one-half mile of the subject property.

- Review of the current DEQ Confirmed Release List (CRL) and Inventory databases indicated that three sites, including the subject property are located within one mile of the subject property.

- Review of the current Leaking Underground Storage Tanks (LUSTs) database indicated that two sites, including the subject property, are located within one-half mile of the subject property.

Review of the Oregon Water Resources Department (OWRD) well log database revealed four well driller's reports for wells listing Ochoco Lumber Company as the owner. The database included 96 other well logs for water wells located in Section 4 and records for five boring and four monitoring wells installed at the fuel station located northeasterly of the intersection of SE Combs Flat Road and Highway 26. The well logs for the subject property indicate that subsurface geologic formations include interbedded layers of sandy clay, gravel, clay, sand, and silt. Static groundwater levels were reported as being between 20 and 55 feet below ground surface (bgs). The water resources database indicates that the static water level for wells in Section 4 averages 23 feet bgs, with a median of 18 feet bgs, a maximum of 383 feet bgs, and a minimum of 3 feet bgs. The database indicates that first water encountered for wells in Section 4 averages 60 feet bgs, with a median of 23 feet bgs, a maximum of 390 feet bgs, and a minimum of 8 feet bgs. Ochoco Lumber Company records show that six wells have been present on the subject property (Figure 3). An abandoned hand driven well is shown as having been present between the Planer Building and the Bander Building. Another hand driven abandoned well is shown near the southeast corner of the Truck Shop. A "good well" is shown on the southerly side of the Dry Sorter. An artesian well that fed the Boilers and Large Log Mill and provided good drinking water is shown near the northeast corner of the Powerhouse. A "bad well" drilled in 1991 that has not been abandoned is shown south of the Small Log Mill and west of the Sorter. A Small Log Mill well that was drilled in 1999 is shown south of the 1991 well.

Review of documents provided by Ochoco Lumber Company regarding previous investigations and activities relating to operations at the subject property indicated that the site received a Notice of Noncompliance (NON) in 1997 following a DEQ inspection of the facility. The violations included: Hazardous Waste / Used Oil violations in the truck shop, a shed between the office and the truck shop the planer room, and the large and small log mill; antifreeze generated and the truck shop; and drums and containers stored in the boneyard; Spill Violations in the debarker and transformer storage area in the boneyard.

The inspections identified asbestos containing white blocks in a partially covered wood container in the boneyard in violation of OARs resulting in a NON and assessment of civil penalty. The inspection also identified what appeared to be a standpipe possible associated with an underground tank at the old truck shop that needed to be addressed; the presence of a solvent degreasing station in the small logmill that was not used. The inspection report indicated that used oil and antifreeze from the truck shop, and hydraulic oil from the planer was routinely dumped on the hog fuel pile and burned in the boiler. A solvent tank was used in the truck shop and serviced by Safety-Kleen every 2 months.

During 1997 and 1998 Ochoco Lumber Company took actions to address the violations including material identification, labeling, analysis, recycling and disposal. Removal, disposal, and confirmation sampling of soil was conducted in three locations: 1) the used oil storage area near the northwest corner of the electric shop building; 2) beneath the three electrical transformers near the east boundary of the site; and 3) a portion of the boneyard area at the east end of the south log deck. Ochoco Lumber discontinued the practice of mixing the used oil with the hog fuel and purchased and installed a waste oil burner. The pipes believed to be vent pipes for a UST were identified as being a shallow "sand point" well.

In 1998 a 10,000 gallon diesel UST and a 10,000 gallon gasoline UST that had been installed in 1956 were decommissioned by removal. Four soil samples were collected from the excavation at depths ranging from ten to 11.5 feet and one sample was collected from the soil pile for HCID analysis. Diesel and gasoline were detected in the soil pile at concentration of 180 ppm and 113 ppm respectively. Gasoline was detected in the southerly soil sample at 37 ppm.

The DEQ conducted a Site Assessment Review of the property in 2004. The review identified potential contaminants of concern as being predominantly petroleum products and solvents with the following areas of concern: a) the boneyard and review of cleanup conducted in 1997/98; b) truck shop and review of cleanup conducted in 1997/98; c) transformers and review of cleanup conducted in 1997/98, additional information of Pacific Power 2004 transformer removal; d) small log mill and addressing the second degreasing station and release to soil; e) large log mill; f) green chain; g) the barker; h) the planer; i) the boiler/powerhouse; j) the former log pond; k) the existing ASTs and former ASTs; l) the old truck shop and sump or dry well; m) additional areas identified during the post demolition investigation.

The site visit was conducted on March 31, 2005. The property was found to be cleared of all structures associated with the former sawmill with the exception of the office building.

During the site visit, several areas of significant environmental concern were observed. The primary contaminant of concern that was observed during the site visit appeared to be petroleum hydrocarbons associated with hydraulic/debarking equipment and used and/or lubricating oil associated with vehicle maintenance. These materials may also carry other Contaminants of Concern as defined by the EPA and DEQ, but it was not possible to determine this during the site visit. The particular areas of concern are detailed below. Standing water that was observed in several locations approximately 8 feet below the ground surface was assumed to be the static groundwater level at the subject property. Based on the observations made during the site visit, it is likely that regulated impacts to both soil and groundwater are present at the subject property.

A Phase I Environmental Site Assessment was conducted for the subject property in accordance with the scope and limitations of ASTM Practice E 1527-00. The assessment has revealed evidence of recognized environmental conditions in connection with the property.

The following areas were identified as areas of potential environmental concern on the subject property:

- The Boiler/Powerhouse and Fuel Bin area
- Truck Shop
- AST / Former UST area
- Planer / Stand Up Shed area
- Old Truck Shop
- Storage Area near Dry Lumber Shed
- Small Log Mill
- Large Log Mill
- Green Chain
- SLM Barker
- Log Pond
- Boneyard area
- Bull Chain Motor Pit
- Solvent Disposal Practices
- Solid/Regulated Waste Disposal Practices

It is the professional opinion of Osprey Environmental, LLC that Phase II Environmental Site Assessment (ESA) activities are necessary at the subject property at this time. It is anticipated that the Phase II ESA will involve the collection of soil and groundwater samples from several areas of the subject property utilizing the excavation of exploratory test pits and the installation of geoprobe and/or hollow stem auger borings. Analyses of both soil and groundwater will likely include petroleum hydrocarbons, heavy metals, polynuclear aromatic hydrocarbons (PAHs), volatile organic compounds, (VOCs) and polychlorinated biphenyls (PCBs). However given the cost of the Phase II ESA, Osprey staff believes that it is prudent to negotiate the specific scope of the Phase II ESA directly with Mr. Toby Scott, the DEQ's Voluntary Cleanup Program Project Manager for the subject property. As such, Osprey staff recommends that negotiations be undertaken with Mr. Scott to develop a Sampling and Analysis Plan that is acceptable to both the Ochoco Lumber Company and the DEQ at this time.

2.0 Introduction

This report documents the findings and methodology of the Phase I Environmental Site Assessment conducted by Osprey Environmental, LLC for the approximately 76.14 acre property located at 200 SE Combs Flat Road in Prineville, Oregon. Osprey Environmental, LLC was retained by Bruce Daucsavage of Ochoco Lumber Company of Prineville, Oregon to conduct the Phase I Environmental Site Assessment in accordance with the American Society of Testing and Materials (ASTM) E-1527-00.

The Phase I Environmental Site Assessment included a review of information provided by Ochoco Lumber Company staff, available regulatory agency records and databases, historic aerial photographs and maps, interviews with persons knowledgeable regarding the property, and a site visit.

2.1 Purpose

The purpose of the Environmental Site Assessment that was conducted for the subject property was to identify, to the extent feasible, *recognized environmental conditions* existing at the subject property in accordance with ASTM E1527-00. *Recognized environmental conditions* include the presence or likely presence of any hazardous substances or petroleum products on the property under conditions that indicate a release into structures on the property or into the ground, groundwater, or surface water of the property. The term is not intended to include de minimis conditions that do not present a risk of harm to public health or the environment, and that would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies. Assumptions, terms and conditions, and limitations and exceptions associated with the performance of the Phase I Environmental Site Assessment are discussed in Sections 9.0 and 10.0.

3.0 Site Description

3.1 Location, Legal Description, Site and Vicinity Characteristics

The 76.14 acre subject property is located at 200 SE Combs Flat Road is located at the southeast corner of Ochoco Highway (3rd Street) and SE Combs Flat Road (Paulina Highway) in the easterly portion of the City of Prineville, Oregon. The property consists of four Crook County Tax Lots 151604B00-7200, -7300, -7101, and 151604C00-2900 (Figure 1: Vicinity Map, Figure 2: Tax Lot Map).

The property is bordered to the north by Ochoco Highway (3rd Street), beyond which are a gasoline station and commercial developments, to the west by SE Combs Flat Road (Paulina Highway) beyond which is residential properties and a day care facility, to the east by residential properties, and to the south by Hylton Lane beyond which are residential properties. The surrounding area consists of a school, residential, and commercial properties. The site topography is generally level with the stream channel of Ochoco Creek passing through the northerly portion of the property and a depressed area associated with a portion of the former log holding pond.

3.2 Description of Structures, Roads, Other Improvements on the Site

The Crook County Assessor records indicate that listed under the ownership of the Ochoco Lumber Company of Prineville, Oregon. The property is listed as having public water, sewer, electricity, and gas. A copy of the Assessor records is included in Appendix A.

The approximately 76.14 acre property is currently in the process of redevelopment for commercial and possible residential uses. All mill buildings, except the main office, have been demolished with the concrete foundations remaining. The office is connected to City water and sewer while the mill historically had outhouses or portable toilets. A cap and fill system was installed in 1987 to serve the sanitary sewer needs of the of the Small Log Mill. A septic system served the sanitary sewer needs of the Shipping and Planning portion of the subject property.

3.3 Current and Past Uses of the Property and Adjoining Properties

The subject property is located outside of the City of Prineville and is zoned for industrial use. A portion of Tax Lot 7200 north of Ochoco Creek has been zoned for commercial use. The property is currently in the process of being redeveloped. Neighboring properties currently consist of residential and commercial properties.

Historical research indicates that the subject property was developed as Ochoco Lumber Company in 1938. The mill was used for sawing logs, drying and planing lumber. According to Ochoco Lumber staff, no wood treatment or veneer operations were conducted at the property. The mill closed in 2001. Residences had been present on the northerly portion of the subject property along Highway 26 from the late 1940s through at least 1974.

Historical research on surrounding properties indicates rural residential development began in the surrounding area prior to 1943. A petroleum bulk plant was operated at the northeast corner of SE Combs Road and Highway 26 from about 1935 until 1981. A service station also operated there since the 1930s. A school has been present westerly of the subject property since the 1960s. A large commercial shopping area has been present northwesterly of the subject property since the 1990s.

4.0 User Provided Information

4.1 Title Records, Environmental Liens or Activity, Use Limitations, Valuations Reduction for Environmental Issues, Previous Investigations

No information regarding environmental liens or activity, use limitations, or valuation reduction for environmental issues was provided by Ochoco Lumber Company of Prineville, Oregon.

Ochoco Lumber Company provided documents regarding previous investigations and activities relating to operations at the subject property. The following summarizes information from the documents provided.

Letters Pertaining to 1997 DEQ inspection of the facility resulting in Notice of Noncompliance (NON) HW-ERB-97-0080 and AQ-ERB-97-0067

DEQ letter to Steve Lyon, Ochoco Lumber, dated August 6, 1997, DEQ Hazardous Waste Compliance Evaluation Inspection Report dated September 29, 1997 and DEQ letter to Steve

Lyon, Ochoco Lumber, dated October 6, 1997 - Jeff Ingalls, DEQ, inspected the facility on July 29 and 30, 1997 and observed: 1) unknown wastes in the boneyard; 2) antifreeze dumping into the used oil then mixed into the hogged fuel pile; 3) solvent tank in the small log mill that did not appear to be managed by either Safety-Kleen or NAPA Auto; 4) three abandoned batteries in the boneyard; 5) material in a large wooden box in the back of the boneyard that contained 10% asbestos; 6) oil releases from four transformers that were not labeled as being non-PCB; 7) unlabeled used oil containers behind the small log mill, in the boneyard, and at the truck shop; 8) releases of used oil outside of the truck shop and at the debarker by the pump house; 9) uncovered used oil containers at the truck shop, behind the small sawmill, and in the boneyard; 10) what appeared to be a standpipe possible associated with an underground storage tank outside the locked up old truck shop.

A follow up inspection on September 16, 1997 was conducted and resulted in an NON. The inspections were conducted as a result of a complaint received by the DEQ concerning used oil management and wastewater discharges to the log floating pond and that chemicals that were being used in the boiler operations were discharged to the pond. The Ochoco Lumber facility was determined at that time to be a conditionally exempt generator of hazardous waste and a used oil generator.

The following violations were found. **Hazardous Waste** – 1) Failure to make hazardous waste determinations of used oil generated at the truck shop, the planer room, and the large and small log mill; antifreeze generated and the truck shop; and unlabeled drums and containers stored in the boneyard. **Used Oil** – 1) Failure to label used oil containers at locations outside the truck shop; a shed between the office and the truck shop; five 55 gallon drums stored in the boneyard; a 55 gallon drum behind the small log mill. 2) Failure to clean up visible releases of used oil outside the truck shop; five 55 gallon drums stored in the boneyard; a 55 gallon drum behind the small log mill. 3) Failure to keep used oil stored in a covered container outside the truck shop and a 55 gallon drum behind the small log mill. **Spill Requirements** – 1) Failure to make an effort to stop or clean up spills at the ongoing equipment leak at the debarker; releases of oils from transformers stored in the boneyard.

The inspection also identified what appeared to be a standpipe possible associated with an underground tank at the old truck shop that needed to be addressed; the presence of a solvent degreasing station in the small logmill that was not used. The inspection report indicated that used oil and antifreeze from the truck shop, and hydraulic oil from the planer was routinely dumped on the hog fuel pile and burned in the boiler. A solvent tank was used in the truck shop and serviced by Safety-Kleen every 2 months.

DEQ letter to Stuart Shelk, Jr., Ochoco Lumber, dated August 11, 1997, DEQ letter to Ochoco Lumber, dated September 12, 1997 – The inspections identified asbestos containing white blocks in a partially covered wood container in the boneyard in violation of OARs resulting in a NON and assessment of civil penalty.

Ochoco Lumber letter to DEQ dated October 22, 1997; ECI PCB Transformer Sampling Letter to Steve Lyon dated October 17, 1997; ECI Soil Sampling Letter to Steve Lyon dated November 10, 1997; Ochoco Lumber letter to DEQ dated January 9, 1998 – The letters outlines measures

Ochoco Lumber took to address the violations including material identification, labeling, analysis, recycling and disposal. Ochoco Lumber discontinued the practice of mixing the used oil with the hog fuel and purchased and installed a waste oil burner. The pipes believed to be vent pipes for a UST were identified as being a shallow "sand point" well.

ECI Soil Cleanup Documentation of Used Oil Storage Area; Transformer Storage Area; Boneyard Area to Steve Lyon dated February 19, 1998 – The letter report summarizes the cleanup oversight conducted between October 1997 and January 1998 for removal of petroleum contaminated soils at three locations: 1) the used oil storage area near the northwest corner of the electric shop building; 2) beneath the three electrical transformers near the east boundary of the site; and 3) a portion of the boneyard area at the east end of the south log deck.

In October 1997 a soil sample from the used oil storage area near the electric shop was analyzed for TPH, PCBs, leachable heavy metals, and volatile organic compounds. The petroleum contaminants were identified as diesel and heavy oil. No PCBs were detected. The impacted soil was determined not to be a hazardous waste. Soil was excavated from the area resulting in a 16 by 22 foot area that was 30 to 40 inches in depth. Four verification samples were collected and for TPH with the highest resulting sample analyzed for PAHs. No TPH with 220 ppm, 233 ppm, and 247 ppm detected in the other three samples. No PAHs were detected in the sample analyze. The samples were not analyzed for BTEX since BTEX results from the initial sample with three times the magnitude TPH had resulted in BTEX concentrations that did not exceed the Oregon Soil Cleanup levels.

In October 1995 and October 1997 dielectric fluid samples were collected from four transformers stored on the ground surface near the east boundary of the site. No PCBs were detected in the samples analyzed. Soils were excavated from the visible stained area beneath the transformer storage location resulting in an approximately ten foot by 12 foot excavation 18 inches deep. Two soil samples were collected from the bottom of the excavation and analyzed for TPH. No petroleum hydrocarbons were detected.

In January 1998 visible contaminated soil was excavated from the boneyard area resulting in a ten by 17 foot area that was up to 24 inches deep. No TPH was detected in the verification samples collected from the bottom of the excavation.

The 56.29 tons of excavated soil was transported and disposed of the Crook County Landfill as petroleum contaminated soil in January 1998.

ECI fax with Information regarding UST dated April 28, 1998 - A 10,000 gallon diesel and a 10,000 gallon gasoline UST were installed in 1956 and decommissioned by removal in April 1998. Four soil samples were collected from the excavation at depth ranging from ten to 11.5 feet and one sample was collected from the soil pile for HCID analysis. Diesel and gasoline were detected in the soil pile at concentration of 180ppm and 113 ppm respectively. Gasoline was detected in the southerly soil sample at 37 ppm.

DEQ Notice of Site Assessment Review letter to Ochoco Lumber dated February 23, 2004; Ochoco Lumber letter to Dan Crouse (DEQ) dated March 8, 2004; DEQ Site Assessment

Program Strategy Recommendation dated June 21, 2004; Ochoco Lumber letter to Dan Crouse dated September 1, 2004 – The correspondence pertains to the DEQ Site Assessment Review of the property and site history. The Large Log Mill was built in 1938 and the first planning mill was added in 1939 along with the dry kilns and the storage sheds. A barker was added during the late 1950s or early 1960s. The facility went through a major renovation during the early 1970s that included adding a new chipper and horizontal resaw. Another major renovation was completed during 1987 and 1988 when the small log mill and an additional planer were constructed and started operating. The mill also included a boiler house, former log pond, outside storage areas, and truck shop. Wood treatment and veneer work was not done on the site. In October 2000 the large log mill discontinued operation followed by the shut down of the small log mill in July 2001. The mill operated continually from 1938 to 2001 sawing logs, drying and planing lumber, but was idle since July 2001 and a mill auction dispersed machinery in March 2004. Potential contaminants of concern were listed as being predominantly petroleum products and solvents. The Site Assessment identified the following areas of concern: a) the boneyard and review of cleanup conducted in 1997/98; b) truck shop and review of cleanup conducted in 1997/98; c) transformers and review of cleanup conducted in 1997/98, additional information of Pacific Power 2004 transformer removal; d) small log mill and addressing the second degreasing station and release to soil; e) large log mill; f) green chain; g) the barker; h) the planer; i) the boiler/powerhouse; j) the former log pond; k) the existing ASTs and former ASTs; l) the old truck shop and sump or dry well; m) additional areas identified during the post demolition investigation.

4.2 Reason for Performing Phase I

Ms. Donna Barnes and Mr. John Morgan, both of Ochoco Lumber, expressed to Osprey staff that the company intended to redevelop the property for commercial and possible residential uses. As such, the Ochoco Lumber Company desired the performance of the Phase I Environmental Site Assessment to facilitate the environmental investigation activities required by the Oregon Department of Environmental Quality Voluntary Cleanup Program in order to proceed with redevelopment.

5.0 Records Review

The purpose of the records review is to obtain and review environmentally related data that will help identify recognized environmental conditions in connection with the subject property. This review also provides information on the activities that were previously performed at the subject property. The following sections summarize information obtained from the records review task.

5.1 Standard Environmental Record Sources

The following information was obtained from Federal, State, and Local regulatory agencies. Specified search distances are those identified in the ASTM standard.

5.1.1 Federal

The Federal Environmental Protection Agency (EPA) maintains several databases of environmentally regulated or monitored facilities. The following databases were reviewed as part of the Phase I Environmental Site Assessment: National Priorities List (NPL);

Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS); Resource Conservation and Recovery Act (RCRA) Treatment Storage and Disposal Facilities List (TSD), RCRA Hazardous Waste Generator List; and Emergency Response Notification System List (ERNS). Information from the EPA database is included in Appendix B.

National Priorities List (NPL)
The NPL is a compilation of federally listed properties with the highest priority of cleanup under the EPA's Hazard ranking system. Review of the current database on February 17, 2005 did not reveal the subject property or any other NPL sites located within one mile of the property.

CERCLIS and CERCLIS NFRAP List
The CERCLIS list is a database maintained by the EPA of sites that are suspected to, or confirmed as posing a risk to human health and the environment and are being addressed under the Federal Superfund program. Review of the current CERCLIS database on February 17, 2005 did not reveal any CERLCIS sites located within ½ mile of the subject property. The CERCLIS NFRAP list is also maintained by the EPA and includes sites where no further remedial action is planned under CERCLA. Review of the current CERCLIS NFRAP database on February 17, 2005 did not reveal the site or any adjacent properties on the CERLCIS NFRAP database.

RCRA CORRACTS Facilities and RCRA non-CORRACTS TSD Facilities
The EPA maintains a database of facilities that have obtained identification numbers designating them as being involved in the treatment, storage, or disposal (TSD) of hazardous materials. Review of the current RCRA non-CORRACTS TSD database on February 17, 2005 did not reveal the subject property or any other non-CORRACTS TSD facilities within one-half mile of the subject property. Review of the current RCRA CORRACTS (Corrective Action) database on February 17, 2005 did not include the subject property or any other CORRACTS facilities within one mile of the subject property.

RCRA Generators
The EPA maintains a database of facilities that have obtained identification numbers designating these businesses as generators of hazardous materials. Neither the subject property, nor any neighboring properties, was listed on the current RCRA Generators list reviewed on February 17, 2005.

Emergency Response Notification System (ERNS)
The ERNS database catalogs information on sites that have been identified as having reported a release of regulated materials. The suspected contamination at these sites has been neither confirmed nor denied by the EPA, but has prompted emergency response by municipal, state, or federal agencies. The ERNS National Response Center (NRC) 1982 – January 30, 2005 query results for Prineville, Oregon did not include the subject property as having any reported release responses.

5.1.2 State

The Oregon Department of Environmental Quality (DEQ) administers several programs that track sites of potential environmental concern in Oregon. The following databases were

reviewed as part of the Phase I Environmental Site Assessment: Environmental Cleanup Site Information System (ECSI); Confirmed Release List and Inventory; State Registered Underground Storage Tank (UST) Facilities; Leaking Underground Storage Tank (LUST) List; State Landfill and/or Solid Waste Disposal Facilities List; and the State Fire Marshal's Hazmat Incident Reports.

Environmental Cleanup Site Information System (ECSI)

The DEQ has used the ESCI database since 1989 to track sites with known or suspected hazardous substance contamination. Review of the current database on February 8, 2005 revealed three ECSI sites, including the subject property, as being located within approximately ½ mile of the property included on the list. The following table summarizes information regarding the sites included on the DEQ database. Information obtained from the database is included in Appendix B.

ECSI Listed Sites Located Within ½ mile of Subject Property			
Site Name	**Address**	**Contaminants/ Media**	**Status**
Ochoco Lumber	200 SE Combs Flat Rd.	petroleum/ soil	Site listed on CRL/ Inventory Site in Voluntary Cleanup Program
Ochoco Shell	Ochoco Hwy/ SE Combs Flat Rd.	petroleum/ soil, groundwater	Site listed on CRL/ Inventory Land Use Restriction
Ochoco Plaza Cleaners	1555 E 3rd St.	Not reported	No Further Action Determination – 1/02

Confirmed Release List (CRL) and Inventory of Hazardous Substances Sites

The CRL and the Inventory are subsets of ECSI. The CRL includes sites where a release of hazardous substances has been documented while the Inventory lists sites with confirmed releases that the DEQ has determined also require further investigation and/or cleanup. Review of the current databases on February 8, 2005 revealed three CRL or Inventory sites, including the subject property, as being located within one mile of the property. The status of the listed sites is included in the following table. Information obtained from the database is included in Appendix B.

CRL / Inventory Listed Sites Located Within 1 mile of Subject Property			
Site Name	**Address**	**Contaminants/ Media**	**Status**
Ochoco Lumber	200 SE Combs Flat Rd.	petroleum/ soil	Site listed on CRL/ Inventory Site in Voluntary Cleanup Program
Ochoco Shell	Ochoco Hwy/ SE Combs Flat Rd.	petroleum/ soil, groundwater	Site listed on CRL/ Inventory Land Use Restriction
Bryans Texaco	341 E 3rd St.	petroleum/ groundwater	Ongoing remediation

State Registered UST Facilities

The DEQ began registering facilities with Underground Storage Tanks (USTs) in 1988. The DEQ UST program has published a list of facilities in Oregon with registered USTs. Review of

the current database on February 8, 2005 revealed that neither the subject property, nor adjoining properties were listed.

Leaking Underground Storage Tank List (LUST)
The DEQ LUST database includes all sites with reported releases of petroleum products from regulated underground storage tanks (USTs), unregulated USTs, and home heating oil tanks. Review of the current database on February 8, 2005 indicated two LUST sites, including the subject property, are located within ½ mile of the subject property.

LUST Listed Sites Located Within ½ mile of Subject Property			
Site Name	**Address**	**Discovery Date**	**Status**
Ochoco Lumber	200 SE Combs Flat Rd.	4/98	Cleanup completed 10/98
Ochoco Shell	Ochoco Hwy/ SE Combs Flat Rd.	3/95, 11/99	Diesel & Gas in Soil and Groundwater

State Listed Landfill and/or Solid Waste Disposal Sites
The DEQ Solid Waste Department maintains a list of permitted industrial waste facilities, municipal landfills, and transfer stations and material recovery sites. A review of the current DEQ database on February 8, 2005 indicated that no disposal sites are listed as being located within ½ mile of the subject property.

Hazmat Incident Reports
The State Fire Marshal maintains a database containing all reported hazardous material incidents having occurred between 1986 and January 31, 2005. The subject property was not included in the database.

5.2 Physical Setting Sources

Physical setting sources provide information about the geologic, hydrogeologic, hydrologic, and topographic characteristics of a site. The physical setting sources reviewed for this assessment included USGS 7.5 Minute Topographic Maps, the Oregon Water Resources Department Well Log Database, and the 1966 USDA Soil Conservation Service Soil Survey of the Prineville Area, Oregon.

USGS
The USGS Bend, Oregon 7.5-Minute Quadrangles dated 1962 and photo-revised in 1992 were reviewed for this assessment. The maps show that the subject property is located southerly of 3rd Street (Highway 26) and easterly of SE Combs Flat Road in Township 15 South, Range 16 East, Section 4. The property is shown at an elevation of approximately 2,885 feet above mean sea level.

The 1962 and 1992 maps show the property developed with the lumber mill. Fourteen buildings are shown on the property. A road is shown entering the westerly side of the property from SE Combs Road and extending through the property to Willowdale Drive. A log pond is shown in the northerly portion of the property. An unimproved road is shown adjacent to the northerly side of the log pond and Ochoco Creek is shown crossing the subject property northerly of the

unimproved road. What appear to be small residential structures are shown in the corners of the northerly portion of the property along 3rd Street. A railroad line is shown southerly of the log pond. A ponded area is shown along Ochoco Creek in the easterly portion of the property. A small fire pond is shown in the central area between the log pond and the ponded area. Residential dwellings are shown on the surrounding properties to the east, south and west. Residential and some larger buildings are shown northerly of the subject property beyond 3rd Street. Copies of portions of the USGS maps are included in Appendix C.

Oregon Water Resources Department Well Log Database

Review of the Oregon Water Resources Department (OWRD) well log database revealed four well driller's reports for wells listing Ochoco Lumber Company as the owner. The database included 96 other well logs for water wells located in Section 4 and records for five boring and four monitoring wells installed at the fuel station located northeasterly of the intersection of SE Combs Flat Road and Highway 26. The following table summarizes information obtained from the driller's well reports for water wells. Copies of the Ochoco Lumber Company well reports from the database are included in Appendix D.

Water Resources Department Water Well Records

¼ ¼	Owner	Use	Date	Well Depth (ft)	Water Depth (ft)	
					First	Static
SESW	Ochoco Lumber Co.	Industrial	Nov-91	240	232	35
SWNW	Ochoco Lumber Co.	Industrial	Oct-99	250	223	55
NW	Ochoco Lumber Co.	Industrial	May-88	231	--	40
--	Ochoco Lumber Co.	Domestic	Apr-67	85	--	20
NENE	Fischer	Domestic	Jul-87	50	20	20
NENE	Stanslond	Not listed	Jun-99	260	175	67
NENE	Stanslond	Not listed	Jun-99	260	175	67
NENE	Stanslond	Not listed	May-99	265	180	53
NENE	Stensland	Not listed	Oct-90	285	175	30
NENE	Stensland	Not listed	Oct-90	275	180	35
NENW	Waetjen	Irrigation	Jan-84	30	16	12
NESE	Carter	Domestic	Apr-00	40	23	14
NESW	Begley	Domestic	Apr-65	55	--	15
NESW	Boynton	Domestic	Nov-02	45	35	25
NESW	Carroll	Domestic	Sep-90	30	18	18
NESW	Cleary	Domestic	May-72	25	20	7
NESW	Cleary	Domestic	May-72	25	19	7
NESW	Fisher	Domestic	Sep-03	50	40	10
NESW	Gibson	Domestic	Oct-96	855	390	383
NESW	Hayes	Domestic	Apr-62	44	--	20
NESW	Kruzich	Domestic	Jun-72	50	30	15
NESW	Ledford	Domestic	Apr-94	47	25	18
NESW	Strickland	Domestic	Nov-92	500	215	15
NESW	Vaughn	Domestic	Mar-04	30	20	10
NWNE	Endicott	Irrigation	Sep-56	24	9	--
NWNE	Reid	Domestic	Sep-93	255	90	20

Water Resources Department Water Well Records						
¼ ¼	Owner	Use	Date	Well Depth (ft)	Water Depth (ft)	
					First	Static
NWNW	Holmes	Domestic	May-92	35	20	20
NWNW	Pedigo	Domestic	Sep-04	30	21	10
NWNW	W H Mcpherson	Domestic	Jul-94	39	26	20
NWNW	Hickeys	Irrigation	Dec-46	16	18	7
NWSE	Hudson	Domestic	Aug-74	30	18	6
NWSE	L D S Church	Domestic	Nov-76	225	20	8
NWSW	Cox	Domestic	Aug-02	110	22	22
NWSW	Dees	Domestic	Jul-03	50	40	15
NWSW	Fox	Domestic	Sep-89	36	22	20
NWSW	Jordan	Domestic	Aug-03	35	25	10
NWSW	Lewis	Domestic	Aug-03	30	20	5
SENE	Pacific Power Light	Community	Jan-73	246	223	--
SENW	Bennett	Domestic	Sep-92	0	20	8
SENW	Hughley	Domestic	Dec-02	46	18	12
SENW	Post	Domestic	Jan-91	230	225	20
SENW	Rich	Domestic	Mar-94	52	22	16
SENW	Rowden	Domestic	Mar-94	58	24	24
SESE	Jones	Domestic	Jul-00	39	29	19
SESE	B. Kennedy Const.	Domestic	Sep-00	55	38	38
SESW	Brickey	Domestic	Dec-02	50	20	20
SESW	Horton	Domestic	Jul-02	--	35	18
SESW	Horton	Domestic	Jul-02	--	35	18
SESW	Morgan	Domestic	Dec-92	30	22	20
SESW	Weatherman	Not listed	May-72	--	--	18
SWNE	Harris	Domestic	May-78	50	26	12
SWNE	Mcallister	Domestic	May-85	40	25	17
SWNE	Nelson	Irrigation	May-76	25	18	7
SWNE	City Of Prineville	Community	Dec-94	280	22	35
SWNW	Holm	Domestic	Jul-03	30	21	12
SWNW	Smalling	Domestic	Jul-03	30	21	12
SWNW	Smalling	Domestic	Jun-03	30	21	11
SWNW	Williamson	Irrigation	Dec-56	20	--	8
SWSW	Fox	Domestic	Feb-66	250	--	3
SWSW	Gill	Domestic	Nov-92	40	32	22
SWSW	Hemphill	Domestic	May-96	40	19	19
SWSW	Lewis	Domestic	Aug-62	63	--	--
SWSW	Mcgee	Domestic	Jul-02	40	32	18
SWSW	Mergel	Domestic	Mar-03	265	250	15
SWSW	Powell	Domestic	Jun-04	50	40	10
SWSW	Smith	Domestic	Sep-02	35	25	10
SWSW	Wells	Domestic	Sep-97	40	20	20
NW	Lyle	Domestic	Nov-93	50	10	10

Water Resources Department Water Well Records						
¼ ¼	Owner	Use	Date	Well Depth (ft)	Water Depth (ft)	
					First	Static
NW	Terwilligar	Domestic	Aug-77	34	8	8
SW	Berman	Domestic	Feb-60	32	--	20
SW	Craddock	Domestic	Oct-64	52	--	21
SW	Stewart	Domestic	Mar-66	60	--	30
SW	Wood	Domestic	Oct-92	60	35	35
SW	Zevely	Domestic	May-60	46	--	18
--	Ammons	Domestic	Jul-67	232	--	--
--	Austin	Domestic	Jul-76	35	21	8
--	Chichester	Domestic	Apr-68	225	--	6
--	Cleary	Domestic	May-72	25	19	7
--	Cleary	Domestic	Mar-71	25	18	5
--	Conklin	Domestic	Mar-69	45	--	18
--	Conklin	Domestic	Nov-67	40	--	15
--	Conklin	Domestic	Sep-69	35	--	8
--	Conklin	Domestic	Sep-69	35	--	4
--	Coonse	Domestic	Apr-74	60	40	15
--	Erwin	Not listed	May-65	230	--	--
--	Ferns	Domestic	May-69	42	--	16
--	Gervais	Domestic	Dec-62	45	--	18
--	Gumpert	Domestic	Apr-62	61	--	16
--	Hannen	Domestic	Jun-60	82	--	64
--	Holliday	Domestic	Oct-67	60	--	22
--	Jones	Domestic	Nov-66	75	--	20
--	Kilgore	Domestic	Nov-60	81	--	16
--	McAlister	Domestic	Mar-61	62	--	25
--	Mizer	Domestic	Mar-70	40	--	17
--	Randall	Domestic	Mar-66	100	--	25
--	Scanlon	Domestic	Jun-60	105	--	16
--	Shulson	Domestic	Dec-90	40	21	21
--	Stewart	Domestic	Sep-70	70	--	22
--	Thompson	Domestic	Mar-67	50	--	25

The well logs for the subject property indicate that subsurface geologic formations include interbedded layers of sandy clay, gravel, clay, sand, and silt. Static groundwater levels were reported as being between 20 and 55 feet below ground surface (bgs). The water resources database indicates that the static water level for wells in Section 4 averages 23 feet bgs, with a median of 18 feet bgs, a maximum of 383 feet bgs, and a minimum of 3 feet bgs. The database indicates that first water encountered for wells in Section 4 averages 60 feet bgs, with a median of 23 feet bgs, a maximum of 390 feet bgs, and a minimum of 8 feet bgs.

Ochoco Lumber Company records show that six wells have been present on the subject property (Figure 3). A hand driven well that was labeled as abandoned was shown as having been present between the Planer Building and the Bander Building. Another hand driven well, which was also

abandoned, was shown near the southeast corner of the Truck Shop. A "good well" is shown on the southerly side of the Dry Sorter. An artesian well that fed the Boilers and Large Log Mill and provided good drinking water is shown near the northeast corner of the Powerhouse. A "bad well" drilled in 1991 that has not been abandoned is shown south of the Small Log Mill and west of the Sorter. A Small Log Mill well that was drilled in 1999 is shown south of the 1991 well.

Prineville Area Soil Survey

Review of the 1966 soil survey indicates that soils in the vicinity of the subject property are classified as: Boyce silt loam (Bs), Boyce silt loam, ponded (Bw), Crooked sandy loam on 0-2% slopes(CtA), Metolius loam on 0-2% slopes (MaA), Metolius loamy sand on 0-2% slopes (MoA), Metolius loamy sand on 2-6% slopes (MoB), Metolius sandy loam on 0-2% slopes (MsA), Powder gravelly loam (Pr), Powder silt loam (Pt), Powder silt loam over gravel (Pu), and Borrow pits (Bp). The Boyce series consist of dark-colored poorly drained or very poorly drained soils that occur on bottom land along Ochoco Creek. They formed from mixed alluvium derived mainly from basalt and partly from rhyolitic tuff and rhyolite. The Crooked series are imperfectly drained soils that have a hardpan. They formed in moderately coarse textured or medium coarse textured alluvium derived from pumice and basaltic material. The Metolius series consists of light-colored, well drained or somewhat excessively drained soils that developed in alluvial material that was derived from light-colored pumice sand mixed with other material. The Powder series consists of light-colored, well drained to moderately well drained soils that developed in mixed alluvium derived mainly from basalt. The Borrow pit land type are areas where gravel, sand, or other soil material have been removed for use in building roads and dams or other purposes.

5.3 Historical Use Information

The purpose of the historical use review is to develop a history of the previous uses of the property and surrounding area in order to help identify if past uses have caused recognized environmental conditions in connection with the subject property. The following historical sources were reviewed as part of this assessment: Historic Aerial Photographs; Sanborn Maps; and Polk City Directories. Crook County Records were reviewed but did not lend any additional information to the completion of the site assessment.

Historic Aerial Photographs

A review of historical aerial photographs can provide information regarding development and past activities at the subject and surrounding properties. Historic aerial photographs of the Bend area dating 1943, 1951, 1960, 1965, 1974, and 1994 were reviewed. Copies of the aerial photographs are included in Appendix E.

1943 – The subject property is shown as being developed as a lumber mill. Ochoco Creek is visible flowing in the northerly portion of the property. A log pond is present southerly of Ochoco Creek. Buildings present on the property include a small office building; a building where the Stand Up/ Planer building is; the Select Shed; the Dry Chain and Stacker; a portion of the Dry Kilns. The area in the vicinity of the Power House and northeasterly of the Power House was obscured in the photograph by smoke. Lumber storage is visible in the southerly area of the property. At least one small building is present in the northwest corner of the property adjacent to SE Combs Flat Road and

Highway 26. Neighboring properties appear to be rural residential or undeveloped with a larger commercial development consisting of a petroleum bulk plant at the northeast corner of SE Combs Flat Road and Highway 26.

1951 – The log pond has been expanded and Ochoco Creek diverted to the north. Logs are also visible in a ponded portion of Ochoco Creek. The Planer building and Dry Kilns have been expanded. The Green Chain Sorting Shed and Small Log Mill are also visible in the 1951 aerial photograph. Several other small residential-type buildings appear to be present in the northwesterly portion of the property. Residential properties are apparent in the subject property vicinity.

1960 – The subject property appears much as in the 1951 photographs. The Large Log Debarker, Truck Shop and Parts Warehouses, as well as the Warehouse/ Old Truck Shop appear to have been constructed. The road exiting the easterly portion of the property accessing Willowdale Drive is more prevalent.

1965 – Structures visible in the 1965 photograph are much as those visible in the 1960 photograph. The Dry Lumber Shed and an additional office building appear to have been constructed. A recreational field track associated with a school is visible westerly of the mill beyond SE Combs Flat Road.

1974 – No significant changes are apparent in the mill buildings in the 1974 photograph when compared to the 1965 photograph. What appears to be a large dark area is visible in the southerly portion of the property. Former Ochoco Lumber staff reported that this area was utilized for sprinkling logs and was often very wet but was not a pond. The original office building no longer appears to be present.

1994 – The Bander Building appears to have been constructed. Small residential-type buildings in the northwesterly portion of the property have been removed and the northerly portion of the property is used for lumber storage. A northerly portion of the Log Pond has been filled. A large commercial development is apparent northwesterly of the property.

Sanborn Maps

The Sanborn Fire Insurance Company maps were created to illustrate fire risk in developed areas. Since the maps were drawn to scale and updated regularly to keep insurers informed of fire risk, they provide property use information and information of potential sources of environmental concern. The Prineville Sanborn maps dated 1913, and 1928 were reviewed for the assessment. The subject property was not included in the Sanborn maps which may indicate lack of development in that area at that time.

City Directories

The Polk's City Directories dated 1968, 1973, 1978, 1983, and 1991 for Prineville, Oregon were reviewed. The directories list addresses and occupants for developed areas. The directories did listed Ochoco Lumber on Comb Flat road in all of the reviewed directories. Neighboring

addresses on SE Combs Flat Road were listed as residences. Addresses on East Third Street in the vicinity of the subject property were not included in the directories.

6.0 Information from Site Reconnaissance

6.1 General Setting

The property visit was conducted on March 31, 2005 by Osprey Environmental, LLC personnel. The purpose of the site visit was to look for obvious visual indications of historic or current site uses that may have resulted in possible environmental impacts to the subject property. The site visit included a visual evaluation of the subject property for indications of hazardous waste storage, use and disposal areas, storm drainage, underground and above ground storage tank locations, and other potentially impacted areas. Site photographs taken at the time of the assessment are included in Appendix F.

The subject property is located in Prineville, Oregon. The property was found to have been cleared of structures with the exception of the office building. There were no environmental concerns associated with the office building that were observed during the site visit. All other structures, and major debris associated with those structures, had been razed and disposed of as construction/demolition debris at the Crook County Landfill in Prineville, Oregon. The concrete foundations for all of the structures that had been demolished had purposefully been left in place by Ochoco Lumber to facilitate the environmental investigation of the facility.

The site topography is level. Ochoco Creek bisects the approximate northern quarter of the subject property. Historically, there has been significant fill added to the subject property along the course of the creek to prevent seasonal flooding and to increase useable space at the subject property. According to Ochoco Lumber staff, most of the fill material that was placed along the banks of the creek occurred during and after flooding to repair bank erosion.

6.2 Exterior Observations

The subject property consists of approximately 76.14 acres and is primarily undeveloped at this time. The foundations associated with the former wood products facility are still visible. All of the electrical transformers and fluid filled capacitors that had been present at the subject property had been removed prior to the demolition of the structures. Units that were the property of Pacific Power and Light were removed by their staff for proper handling. All of the other units were handled for proper disposal or recycling by Alpine Abatement of Bend, Oregon. Alpine Abatement also undertook an asbestos containing material (ACM) assessment and abatement project prior to the demolition of the structures.

During the site visit, the several areas of environmental concern were observed. These areas of concern are not listed in order of severity of impact. The issues are detailed individually below.

The Boiler/Powerhouse and Fuel Bin area

Numerous areas of soil and foundations stained with what appeared to be used oil or hydraulic fluids were observed in the Boiler/Powerhouse and Fuel Bin area. Several of the stained foundations extended to a depth beneath the ground surface that may be near groundwater. This

creates an easy pathway for contaminants to impact groundwater in the area. Several sources indicated that both petroleum and other potentially regulated wastes were disposed of in the Fuel Bin area. This was not observed during the site visit, but several inches of wood chips obscured the area from visual survey

Truck Shop
Numerous areas of soil and foundations stained with what appeared to be used oil or hydraulic fluids were observed in the area surrounding the Truck Shop. A concrete containment basin was also observed that appeared to have been the former location of an above ground storage tank that was reportedly used to store used oil. It was also observed that two truck maintenance pits with floor drains were present in the western portion of the Truck Shop. These pits were approximately six feet deep and they were saturated with what appeared to be used oil. As groundwater in the area may be as shallow as ten feet below the ground surface the drains in the floor of these pits could create a direct pathway for used oil to impact the groundwater in the area of the Truck Shop.

AST / Former UST area
Minor staining of the soils surrounding the former location of the transfer pumps from what appeared to be tank overfills of diesel fuel was observed during the site visit. Additionally, the concrete containment basin that formerly held the ASTs had a stormwater drain that was only sealed with duct tape. This tape was moderately discolored by what appeared to be petroleum hydrocarbons and the soil beneath the drain was also stained. This was also the former location of two 10,000 gallon USTs (gasoline and diesel) that were decommissioned by removal in 1998.

Planer / Stand Up Shed area
Numerous areas of soil and foundations stained with what appeared to be used oil or hydraulic fluids were observed in the Planer/Stand Up Shed area. In particular the former location of the old planer gear case pit was observed to be very heavily stained. The stained foundations in this area extended to a depth beneath the ground surface that may be near groundwater. There was standing water in the bottom of the planer gear case pit that may have been groundwater that infiltrated into the pit.

Old Truck Shop
Several areas of soil and foundations stained with what appeared to be used oil or hydraulic fluids were observed in the area surrounding the Old Truck Shop. DEQ staff reported that a stand pipe that was believed to be associated with a UST was present in this area. Osprey staff did not observed a suspected fill pipe during the site visit.

Storage Area near Dry Lumber Shed
Several areas of soil and foundations that were heavily stained with what appeared to be used oil or hydraulic fluids were observed in the area of the Dry Lumber Shed. These areas of environmental concern are believed to be associated with oil houses that were present in this area.

Small Log Mill

Numerous areas of soil and foundations that were heavily stained with what appeared to be used oil or hydraulic fluids were observed in the Small Log Mill area. Several of the stained foundations extended to a depth beneath the ground surface that may be near groundwater. This creates an easy pathway for contaminants to impact groundwater in the area. As this area was near Ochoco Creek and the Fire Pond, it is likely that groundwater is very shallow in this area.

Large Log Mill
Numerous areas of soil and foundations that were heavily stained with what appeared to be used oil or hydraulic fluids were observed in the Large Log Mill area. Several of the stained foundations extended to a depth beneath the ground surface that may be near groundwater. This creates an easy pathway for contaminants to impact groundwater in the area. As this area was adjacent to the Log Pond, it is likely that groundwater is very shallow in this area. Additionally, as the Large Log Mill was directly adjacent to the Log Pond, it is likely that contaminants of concern have been discharged to the Log Pond area.

Green Chain
Several areas of soil and foundations that were heavily stained with what appeared to be used oil or hydraulic fluids were observed in the area of the Green Chain. These areas of environmental concern are believed to be associated with routine oiling and maintenance of the Green Chain.

SLM Barker
Numerous areas of soil and foundations that were heavily stained with what appeared to be used oil or hydraulic fluids were observed in the SLM Barker area. Several of the stained foundations extended to a depth beneath the ground surface that may be near groundwater. This creates an easy pathway for contaminants to impact groundwater in the area. As this area was near Ochoco Creek and the Fire Pond, it is likely that groundwater is very shallow in this area.

Log Pond
The former Log Pond area was observed to have been filled in with large boulders, concrete rubble from onsite demolition, soil, and other non-putrescent wastes. The Log Pond did not exhibit any visual or olfactory indications of environmental concern during the site visit. However, its location adjacent to other areas of obvious concern, such as the SLM Barker and the Large Log Mill, makes it an area of concern. Additionally, previous reports indicated that regulated wastes may have been discharged to the former Log Pond.

Bull Chain Motor Pit
The foundation of the Bull Chain Motor pit was heavily stained with what appeared to be used oil or hydraulic fluids. The several of the large electric motors that provided power to the Bull Chain were still present in the pit. The stained foundations in this area extended to a depth beneath the ground surface that may be near groundwater. There was standing water in the bottom of the Bull Chain Motor pit that may have been groundwater that infiltrated into the pit.

7.0 Interviews

During the course of the site assessment nine former employees of Ochoco Lumber were interviewed. Of those interviewed, two in particular were able to produce information that had

not been discovered during the course of the environmental site assessment activities. This otherwise undiscovered information is detailed below.

Mr. Doran Coonse, Sr.
Mr. Coonse worked for Ochoco Lumber for approximately 40 years and was the head mechanic in the Truck Shop at the time of his retirement. Mr. Coonse stated that the only USTs that he ever knew of on the subject property were the two 10,000 gallon tanks that were decommissioned by removal in 1998. Mr. Coonse stated that there were no USTs located at the Old Truck Shop located in the southeastern corner of the subject property. Mr. Coonse also stated that there was no chemical wood treatment, even on a small scale, performed at the subject property.

Mr. Coonse stated that prior to the management of the solvent tanks and parts washers in the truck shop by Safety Kleen or NAPA, the used solvent was routinely mixed with the used oil. According to Mr. Coonse, this used oil was used for dust suppression on the road that ran from the Truck Shop to the back gate. Mr. Coonse stated that layer upon layer of crushed rock was also applied to this area as it became extremely muddy in the winter and spring. Mr. Coonse stated that this practice went on for many years until the solvent began to be recycled.

Mr. Ron Ashley
Mr. Ashley worked in the Planer and Maintenance Departments of Ochoco Lumber since the early 1960s. Mr. Ashley also stated that the only USTs that he ever knew of on the subject property were the two 10,000 gallon tanks that were decommissioned by removal in 1998. Mr. Ashley also stated that he had no knowledge of any chemical wood treatment, even on a small scale, performed at the subject property.

Mr. Ashley was asked specifically about the sharpening of saws and planning equipment. According to Mr. Ashley, the waste generated from the sharpening was swept out of the upstairs sharpening room into the wood waste chute. If this waste was appropriate for Hog Fuel it was sent to the Fuel Pile area. Mr. Ashley stated that if the waste was not appropriate for burning in the boilers it was sent to a disposal area on the northern side of Ochoco Creek. Mr. Ashley stated that this disposal area was located in the southeastern portion of the land on the north side of the creek.

Mr. Ashley also stated that the old Planer gear case leaked for many years. According to Mr. Ashley, the gear housing was poorly designed and it was not possible to stop the release of lubricating oils from the housing. Mr. Ashley stated that they would simply add more lubricating oil to the case on an as needed basis. This refilling apparently took place on a very frequent basis.

8.0 Discussion of Findings, Conclusions and Recommendations

The following conclusions are based on Osprey Environmental, LLC's investigation of the subject property which included review of current and historical property use, environmental records research, and site observations conducted during the Phase I Environmental Site Assessment.

The subject property is located at 200 SE Combs Flat Road in Prineville, Crook County, Oregon. The property consists of tax lots 151604B00-7200, -7300, 7101, and 151604C00-2900 in Township 15 South, Range 16 East, Section 4. The approximately 76.14 acre property was formerly a lumber mill and is currently in the process of redevelopment for commercial and possible residential uses. All mill buildings, except the main office, have been demolished with the concrete foundations remaining. The property is bordered to the north by Ochoco Highway (3rd Street), beyond which are a gasoline station and commercial developments, to the west by SE Combs Flat Road (Paulina Highway) beyond which is residential properties and a day care facility, to the east by residential properties, and to the south by Hylton Lane beyond which are residential properties. The surrounding area consists of a school, residential, and commercial properties.

Historical research indicates that the subject property was developed as Ochoco Lumber Company in 1938. The mill was used for sawing logs, drying and planing lumber. No wood treatment or veneer operations were conducted at the property. The mill closed in 2001. Residences had been present on the northerly portion of the subject property along Highway 26 from the late 1940s through at least 1974.

Historical research on surrounding properties indicates rural residential development began in prior to 1943. A petroleum bulk plant was operated at the northeast corner of SE Combs Road and Highway 26 from about 1935 until 1981 and a service station since the 1930s. A school has been present westerly of the subject property since the 1960s. A large commercial shopping area has been present northwesterly of the subject property since the 1990s.

Review of federal, state, and local environmental records revealed the following:

- The following Environmental Protection Agency (EPA) databases were reviewed for the Phase I Environmental Site Assessment: National Priorities List (NPL); Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS); and Resource Conservation and Recovery Act (RCRA) Treatment Storage and Disposal Facilities List (TSD), RCRA Hazardous Waste Generator List, and Emergency Response Notification System List (ERNS). No listed sites were revealed to be located within the ASTM specified search radii on any of these databases.

- The following Department of Environmental Quality's (DEQ) databases were reviewed for the Phase I Environmental Site Assessment: DEQ Underground Storage Tanks (USTs), Solid Waste Facility database, and the State Fire Marshal's hazardous material incident database. No listed sites were revealed to be located within the ASTM specified search radii on any of these databases.

- Review of the current DEQ Environmental Cleanup Site Information System (ECSI) database indicated that three ECSI sites, including the subject property, are located within one-half mile of the subject property.

- Review of the current DEQ Confirmed Release List (CRL) and Inventory databases indicated that three sites, including the subject property are located within one mile of the subject property.

- Review of the current Leaking Underground Storage Tanks (LUSTs) database indicated that two sites, including the subject property, are located within one-half mile of the subject property.

Review of the Oregon Water Resources Department (OWRD) well log database revealed four well driller's reports for wells listing Ochoco Lumber Company as the owner. The database included 96 other well logs for water wells located in Section 4 and records for five boring and four monitoring wells installed at the fuel station located northeasterly of the intersection of SE Combs Flat Road and Highway 26. The well logs for the subject property indicate that subsurface geologic formations include interbedded layers of sandy clay, gravel, clay, sand, and silt. Static groundwater levels were reported as being between 20 and 55 feet below ground surface (bgs). The water resources database indicates that the static water level for wells in Section 4 averages 23 feet bgs, with a median of 18 feet bgs, a maximum of 383 feet bgs, and a minimum of 3 feet bgs. The database indicates that first water encountered for wells in Section 4 averages 60 feet bgs, with a median of 23 feet bgs, a maximum of 390 feet bgs, and a minimum of 8 feet bgs. Ochoco Lumber Company records show that six wells have been present on the subject property (Figure 3). An abandoned hand driven well is shown as having been present between the Planer Building and the Bander Building. Another hand driven abandoned well is shown near the southeast corner of the Truck Shop. A "good well" is shown on the southerly side of the Dry Sorter. An artesian well that fed the Boilers and Large Log Mill and provided good drinking water is shown near the northeast corner of the Powerhouse. A "bad well" drilled in 1991 that has not been abandoned is shown south of the Small Log Mill and west of the Sorter. A Small Log Mill well that was drilled in 1999 is shown south of the 1991 well.

Review of documents provided by Ochoco Lumber Company regarding previous investigations and activities relating to operations at the subject property indicated that the site received a Notice of Noncompliance (NON) in 1997 following a DEQ inspection of the facility. The violations included: Hazardous Waste / Used Oil violations in the truck shop, a shed between the office and the truck shop the planer room, and the large and small log mill; antifreeze generated and the truck shop; and drums and containers stored in the boneyard; Spill Violations in the debarker and transformer storage area in the boneyard.

The inspections identified asbestos containing white blocks in a partially covered wood container in the boneyard in violation of OARs resulting in a NON and assessment of civil penalty. The inspection also identified what appeared to be a standpipe possible associated with an underground tank at the old truck shop that needed to be addressed; the presence of a solvent degreasing station in the small logmill that was not used. The inspection report indicated that used oil and antifreeze from the truck shop, and hydraulic oil from the planer was routinely dumped on the hog fuel pile and burned in the boiler. A solvent tank was used in the truck shop and serviced by Safety-Kleen every 2 months.

During 1997 and 1998 Ochoco Lumber Company took actions to address the violations including material identification, labeling, analysis, recycling and disposal. Removal, disposal, and confirmation sampling of soil was conducted in three locations: 1) the used oil storage area near the northwest corner of the electric shop building; 2) beneath the three electrical transformers near the east boundary of the site; and 3) a portion of the boneyard area at the east end of the south log deck. Ochoco Lumber discontinued the practice of mixing the used oil with the hog fuel and purchased and installed a waste oil burner. The pipes believed to be vent pipes for a UST were identified as being a shallow "sand point" well.

In 1998 a 10,000 gallon diesel UST and a 10,000 gallon gasoline UST that had been installed in 1956 were decommissioned by removal. Four soil samples were collected from the excavation at depths ranging from ten to 11.5 feet and one sample was collected from the soil pile for HCID analysis. Diesel and gasoline were detected in the soil pile at concentration of 180 ppm and 113 ppm respectively. Gasoline was detected in the southerly soil sample at 37 ppm.

The DEQ conducted a Site Assessment Review of the property in 2004. The review identified potential contaminants of concern as being predominantly petroleum products and solvents with the following areas of concern: a) the boneyard and review of cleanup conducted in 1997/98; b) truck shop and review of cleanup conducted in 1997/98; c) transformers and review of cleanup conducted in 1997/98, additional information of Pacific Power 2004 transformer removal; d) small log mill and addressing the second degreasing station and release to soil; e) large log mill; f) green chain; g) the barker; h) the planer; i) the boiler/powerhouse; j) the former log pond; k) the existing ASTs and former ASTs; l) the old truck shop and sump or dry well; m) additional areas identified during the post demolition investigation.

The site visit was conducted on March 31, 2005. The property was found to be cleared of all structures associated with the former sawmill with the exception of the office building.

During the site visit, several areas of significant environmental concern were observed. The primary contaminant of concern that was observed during the site visit appeared to be petroleum hydrocarbons associated with hydraulic/debarking equipment and used and/or lubricating oil associated with vehicle maintenance. These materials may also carry other Contaminants of Concern as defined by the EPA and DEQ, but it was not possible to determine this during the site visit. The particular areas of concern are detailed below. Standing water that was observed in several locations approximately 8 feet below the ground surface was assumed to be the static groundwater level at the subject property. Based on the observations made during the site visit, it is likely that regulated impacts to both soil and groundwater are present at the subject property. A Phase I Environmental Site Assessment was conducted for the subject property in accordance with the scope and limitations of ASTM Practice E 1527-00. The assessment has revealed evidence of recognized environmental conditions in connection with the property.

The following areas were identified as areas of potential environmental concern on the subject property:

- The Boiler/Powerhouse and Fuel Bin area
- Truck Shop
- AST / Former UST area

- Planer / Stand Up Shed area
- Old Truck Shop
- Storage Area near Dry Lumber Shed
- Small Log Mill
- Large Log Mill
- Green Chain
- SLM Barker
- Log Pond
- Boneyard area
- Bull Chain Motor Pit
- Solvent Disposal Practices
- Solid/Regulated Waste Disposal Practices

It is the professional opinion of Osprey Environmental, LLC that Phase II Environmental Site Assessment (ESA) activities are necessary at the subject property at this time. It is anticipated that the Phase II ESA will involve the collection of soil and groundwater samples from several areas of the subject property utilizing the excavation of exploratory test pits and the installation of geoprobe and/or hollow stem auger borings. Analyses of both soil and groundwater will likely include petroleum hydrocarbons, heavy metals, polynuclear aromatic hydrocarbons (PAHs), volatile organic compounds, (VOCs) and polychlorinated biphenyls (PCBs). However given the cost of the Phase II ESA, Osprey staff believes that it is prudent to negotiate the specific scope of the Phase II ESA directly with Mr. Toby Scott, the DEQ's Voluntary Cleanup Program Project Manager for the subject property. As such, Osprey staff recommends that negotiations be undertaken with Mr. Scott to develop a Sampling and Analysis Plan that is acceptable to both the Ochoco Lumber Company and the DEQ at this time.

9.0 Special Terms and Conditions

This report is intended for the sole use of Ochoco Lumber Company of Prineville, Oregon. Any other parties that wish to use this report to identify recognized environmental conditions as part of the appropriate inquiry process for the site or surrounding properties shall notify Osprey Environmental LLC by executing an application for authorization to use. Non-compliance with these requirements will release Osprey Environmental, LLC from any liability resulting from the use of this report by an unauthorized party.

10.0 Limitations and Exceptions of Assessment

The purpose of this environmental assessment is to evaluate the possibility that hazardous substances contaminate the specified real property. It is not intended to be an exhaustive investigation of environmental conditions or a characterization of any contamination discovered. In performing an environmental assessment, a balance must be struck between the desire to conduct a complete inquiry into environmental matters and the limits of time, cost, and technology. This report presents Osprey Environmental, LLC's (Osprey's) evaluation of the possibility of existing contamination based on the scope of work agreed to by Bruce Daucsavage of Ochoco Lumber Company in Prineville, Oregon (client) and within the client's schedule and budget. Subject to these limitations, Osprey warrants that the assessment and this report satisfy

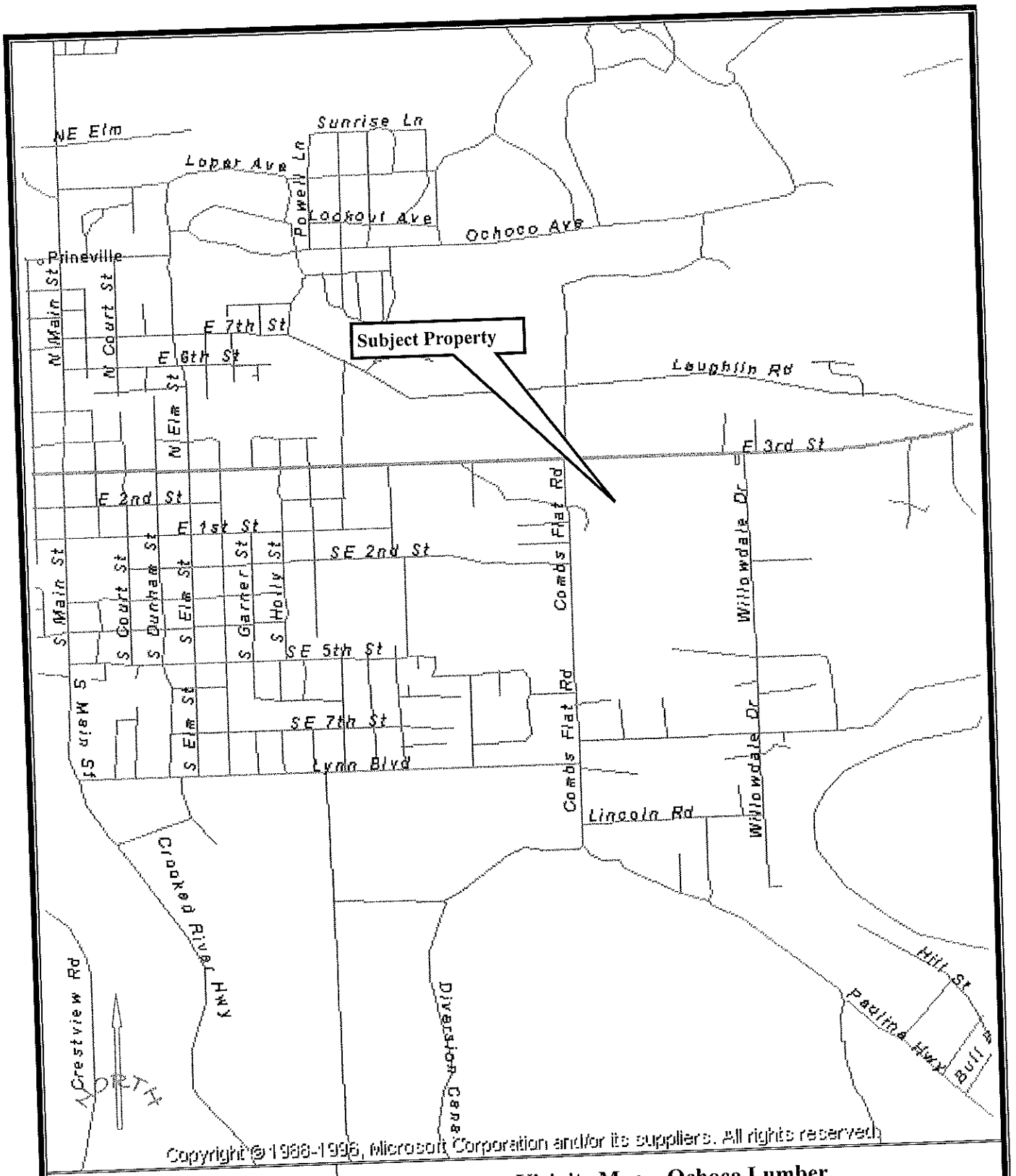
the standards of care, skill, and diligence ordinarily provided by a professional in the performance of similar services as of the time the services were performed. In its review, Osprey focused its attention on: historical information; interviews with knowledgeable persons; site conditions; evidence of hazardous and/or regulated chemicals; and the presence of electrical transformers that could contain PCBs. Osprey also looked generally for evidence of possible contamination by other hazardous substances that are likely to have been associated with the activities historically conducted on the property, to the extent those activities are known and described in this report. In this context, the term hazardous substance includes the chemicals listed as hazardous substances in Title 40 Code of Federal Regulations, Parts 302 and 355, and also includes petroleum products.

No investigation is thorough enough to ensure that no hazardous substances are present on a particular property. If samples were collected in connection with this assessment, the analyses of those samples only indicates the presence or absence of contaminants in the discrete samples. Although Osprey attempts to collect samples from areas most likely to be contaminated based on the information known about the property, contamination may exist in areas not samples, even in areas in the immediate vicinity of a clean sample. Consequently, any analytical results included in this report should be considered only a rough indicator of the possible conditions on the property, with limited statistical significance.

All conclusions, opinions, and recommendations presented in this report are based on conditions existing at the time the services were performed and the laws that were in effect as of that time. Osprey is not able to predict future events that may affect the condition of the property or that may affect the risks attendant those conditions. The reader should be aware that, as technology, social values and laws change, the acceptability of certain environmental conditions also change. This report concerns only those environmental conditions that generally are regarded as unacceptable as of the time the services were performed.

Unless otherwise specified in this report, Osprey has not investigated conditions inside any buildings on the property or the possible presence of hazardous substances incorporated into buildings, equipment, or other improvements on the property. Osprey has not investigated conditions in any area of the property that was not readily accessible. Any area to which Osprey was denied access was mentioned in the report. Except as describes in this report, Osprey also has not investigated the presence of hazardous substances that may be naturally occurring on the property.

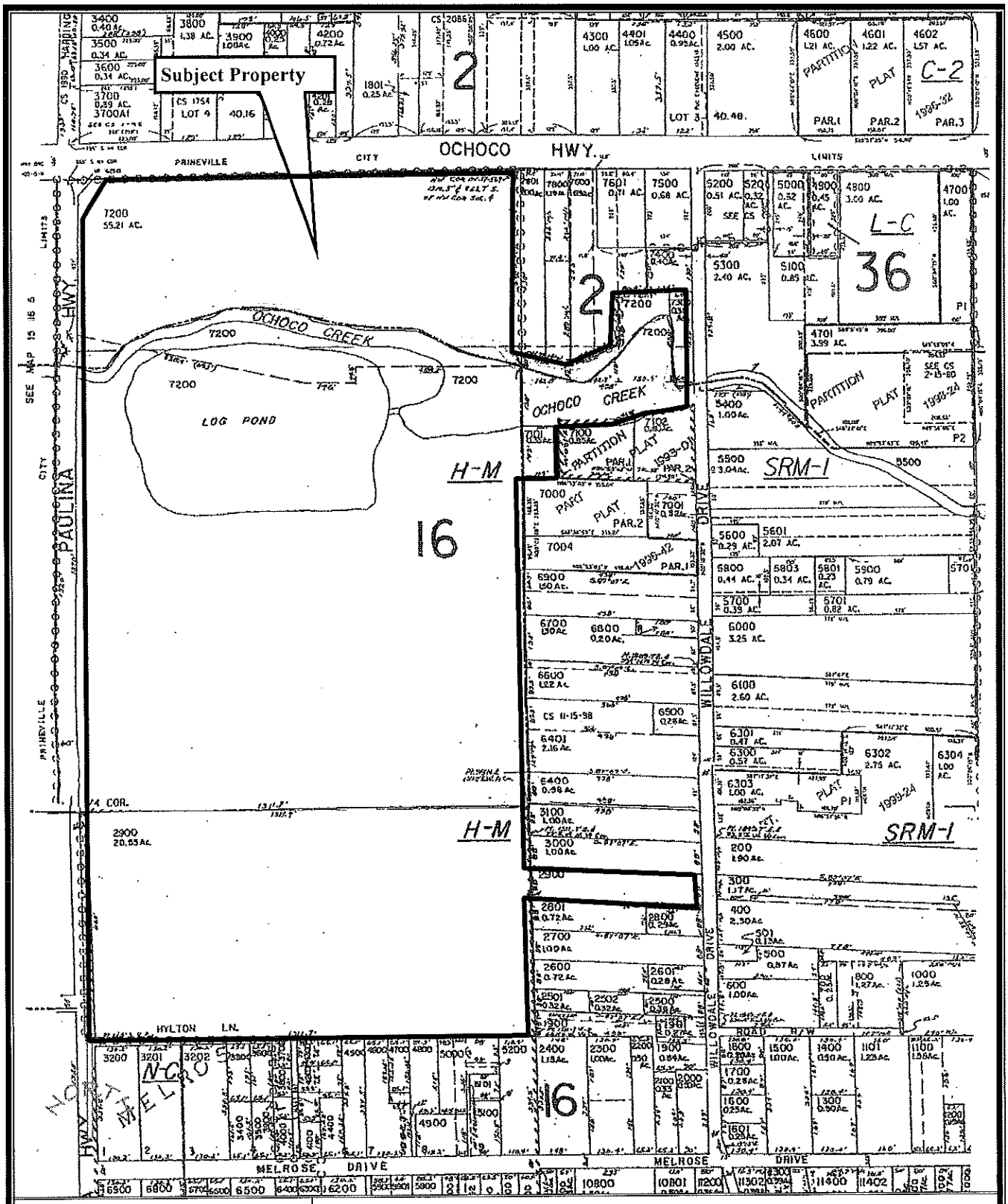
Unless otherwise specified in writing, this report has been prepared solely for the use by the client and only for use in connection with the evaluation of the subject property, if present. Any other use by the client or any use by any other person shall be at the user's sole risk and Osprey shall have no liability or responsibility with respect to such use.



OSPREY
Environmental, LLC

Vicinity Map – Ochoco Lumber
200 SE Combs Flat Road
Prineville, OR 97754

Project No.:	Scale:	Date:	Figure:
O002-1	**Not to Scale**	**April 2005**	**1**



OSPREY
Environmental, LLC

Tax Lot Map – Ochoco Lumber
Tax Lots 15 16 4B -7200, -7300, -7101, & 15 16 4C -2900
200 SE Combs Flat Road, Prineville, OR 97754

Project No.:	Scale:	Date:	Figure:
O002-1	Not to Scale	April 2005	2

	Site Map – Ochoco Lumber 200 SE Combs Flat Road, Prineville, OR 97754			
OSPREY Environmental, LLC	Project No.: **O002-1**	Scale: **Not to Scale**	Date: **April 2005**	Figure: **3**

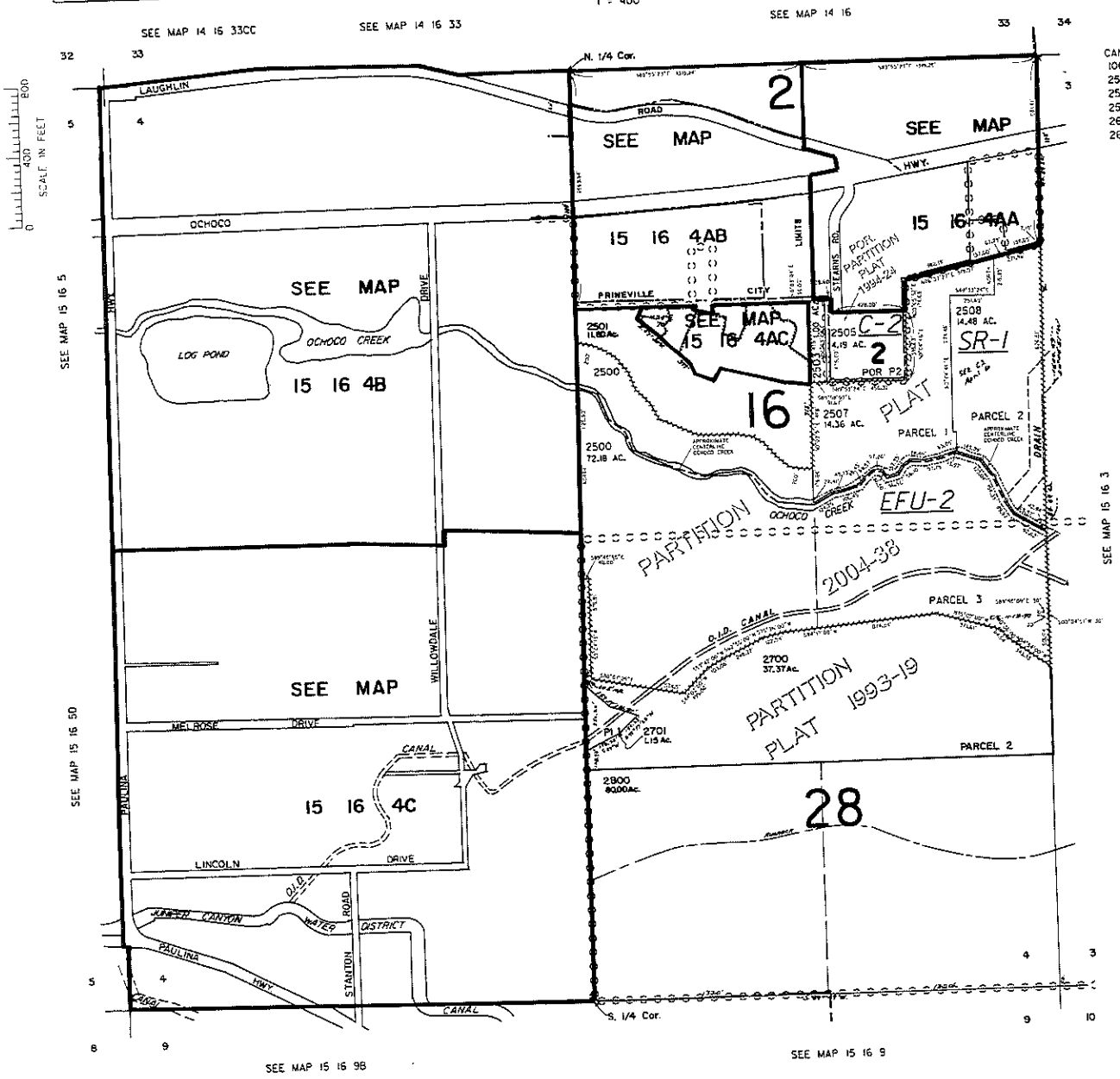
Appendix A

Crook County Records

15 16 4
& INDEX
PRINEVILLE

THIS MAP WAS PREPARED FOR ASSESSMENT PURPOSE ONLY

SECTION 4 T.15S. R.16E. W.M.
CROOK COUNTY
1" = 400'



CANCELLED NO.
100 THRU 2400
2502
2504
2506
2600
2601

Revised
12/9/2004. DM

15 16 4
& INDEX
PRINEVILLE

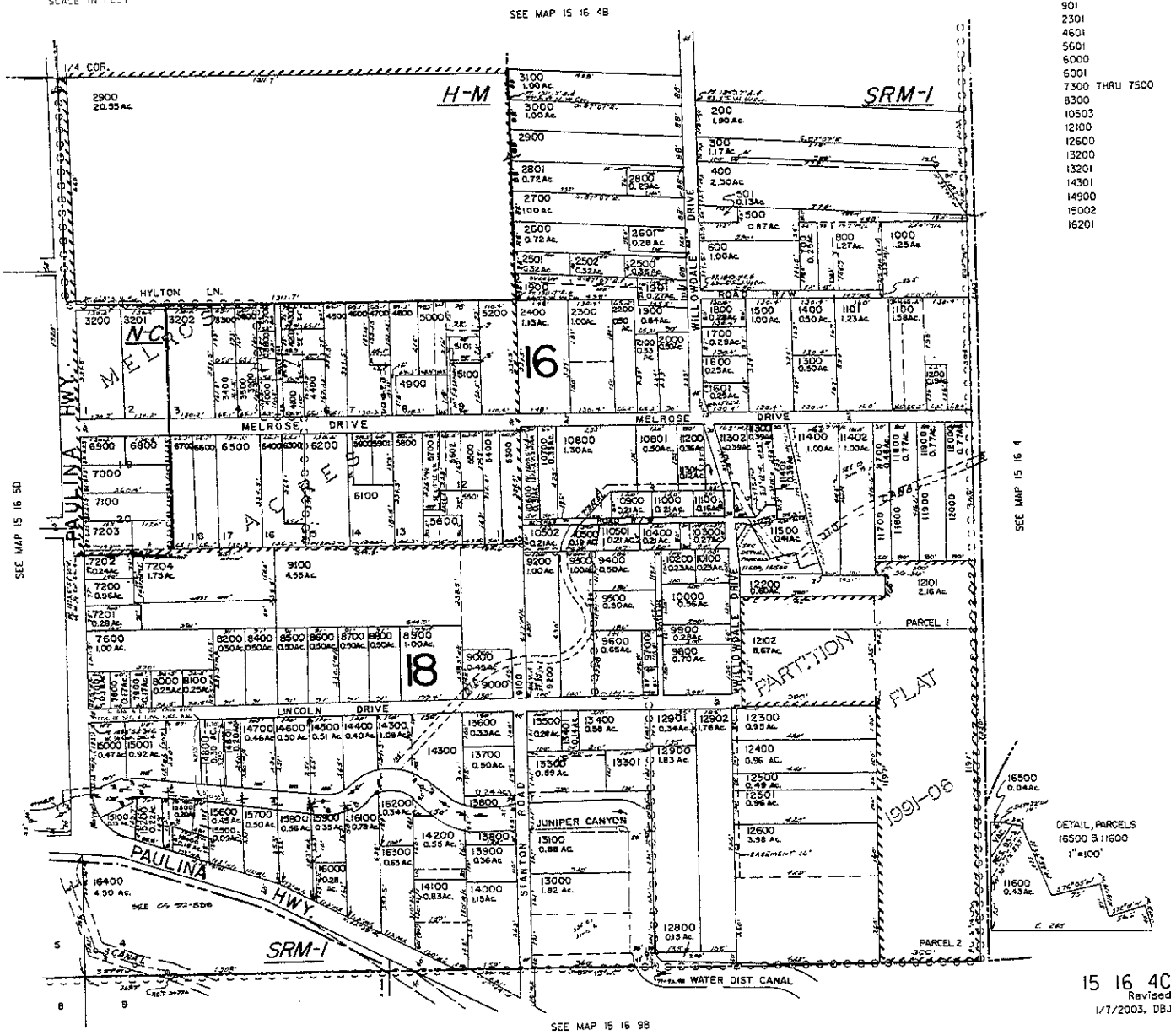
15 16 4C

THIS MAP WAS PREPARED FOR ASSESSMENT PURPOSE ONLY

0 200 400
SCALE IN FEET

SW1/4 SEC. 4 T.15S. R.16E. W.M.
CROOK COUNTY
1" = 200'

CANCELLED NO.
100
900
901
2301
4601
5601
6000
6001
7300 THRU 7500
8300
10503
12100
12600
13200
13201
14301
14900
15002
16201



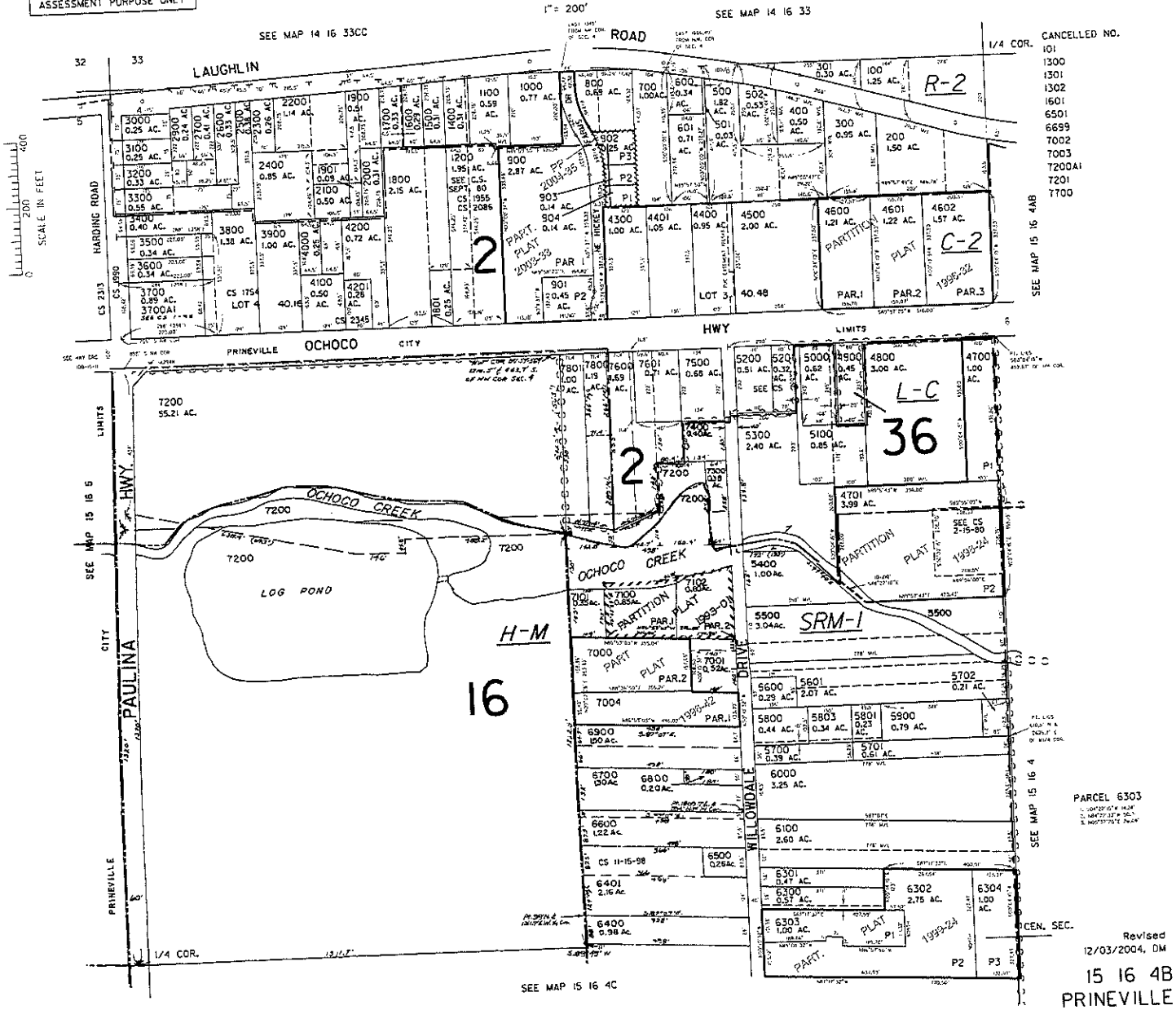
15 16 4C
Revised
1/7/2003, DBJ

15 16 4B
PRINEVILLE

THIS MAP WAS PREPARED FOR ASSESSMENT PURPOSE ONLY

NW1/4 SEC. 4 T.15S. R.16E. W.M.
CROOK COUNTY

1" = 200'



CANCELLED NO.
101
1300
1301
1302
1601
6501
6699
7002
7003
T200A1
7201
7700

Revised
12/03/2004, DM

15 16 4B
PRINEVILLE

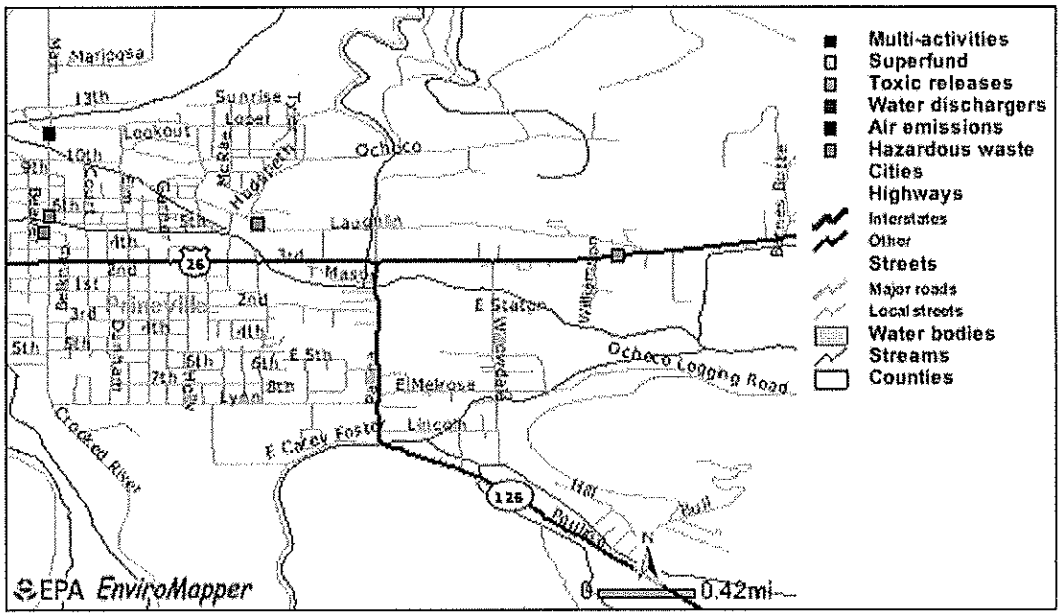
Appendix B

Environmental Database Information

U.S. Environmental Protection Agency

Envirofacts Data Warehouse

Envirofacts



Report an Error

LIST OF EPA-REGULATED FACILITIES IN ENVIROFACTS

To see a report on a facility click on the underlined Facility Name. Click on the underlined "View Facility Information" link to view EPA Facility information for the facility.

Go To Bottom Of The Page

FACILITY NAME/ADDRESS	FACILITY INFORMATION	Permitted Discharges to Water?	Toxic Releases Reported?	Hazardous Waste Handler?	Active or Archived Superfund Report?	Air Releases Reported?
B & S LOGGING 1110 E LAUGHLIN RD PRINEVILLE, OR 97754	View Facility Information	NO	NO	**YES**	NO	NO
CLEAR PINE MOULDINGS INCORPORATED 1155 NORTH MAIN STREET PRINEVILLE, OR 97754	View Facility Information	NO	**YES**	**YES**	NO	**YES**
CROWN AUTO CRAFT 131 E 5TH ST PRINEVILLE, OR 97754	View Facility Information	NO	NO	**YES**	NO	NO
OCHOCO MANUFACTURING CORP	View Facility					

2668 E 3RD ST PRINEVILLE, OR 97754	Information	NO	NO	**YES**	NO	NO
TERRYS AUTO 574 N MAIN ST PRINEVILLE, OR 97754	View Facility Information	NO	NO	**YES**	NO	NO

Go To Top Of The Page

Total Number of Facilities Displayed: 5

This page was generated on Monday, February 28, 2005

View the graphical version of this page at: http://oaspub.epa.gov/wme/i3_ef_link.query_links?db_type=ENVIROFACTS&ul_lr=-120.84934765,44.31789606,-120.80113565,44.28173706

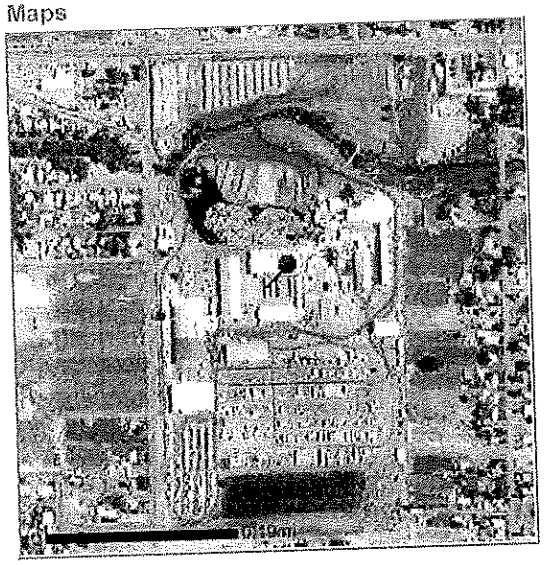
Oregon DEQ Facility Profiler 2.0

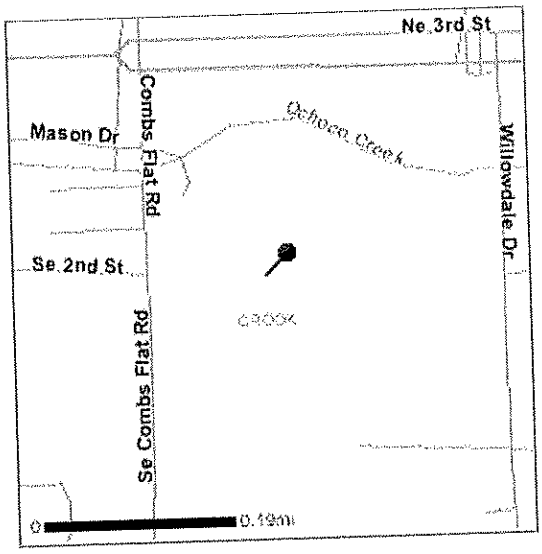
[Help] [Close Window]

Facility Summary Report

Return to Site Listing Print Report

Maps





Facility / Site Information for Location 9507

Facility/Site Name:	OCHOCO LUMBER COMPANY	**Latitude:**	44° 17' 58.6"
Address:	416 COMBS FLAT ROAD	**Longitude:**	-120° 49' 28.6"
City State Zip:	PRINEVILLE OR 97754	**Location Accuracy:**	HIGH
		Last Updated:	9/25/2003

Aliases

Ochoco Lumber Co.	ECSI	OCHOCO LUMBER COMPANY	ACSIS
OCHOCO LUMBER COMPANY	LUST	OCHOCO LUMBER COMPANY	UST

Geographic Features

Township:	T15S-R16E-S4	**Congress Dist:**	2	**Forest Type:**	N/A
County:	CROOK	**OR Senate Dist:**	28	**Vegetation:**	Agricultural cropland and pastureland
Watershed:	LOWER CROOKED	**OR House Dist:**	55	**Agricultural Land:**	PREDOM IRR

Oregon DEQ Program Information

Environmental Cleanup (ECSI)

Operation ID	Start Date	Issue Date	Expiration Date	Permit Type	Permit SubType	Status	Detail Information[1]	EPA Number
2483	02/02/2000			Contaminated Site		Listed on CRL or Inventory	ECSI Site Report	

SIC CODE	SIC Description	PRIMARY
2421	SAWMILLS AND PLANING MILLS	N

Leaking Underground Storage Tanks (LUST)

Log Number	Received	Cleanup Initiated	Cleanup Complete	Type	Heating Oil Tank	UST Facility ID	Status	Detail Information[1]
07-98-0019	04/08/1998	04/06/1998	08/31/1998	REGULATED		7188	CLEANUP_COMPLETED	LUST Site Report

[1] Linked reports may be unavailable from 9:00pm to 7:00am PST due to system maintenance.
[2] DEQ does not maintain air discharge permit information for Lane County.

More Information on this location

Oregon DEQ Neighborhood Info (by region/county)

Profiler Site Summary Report

See wells in the same Township Range Section from the Oregon Water Resources Department Well logs Application
See county's scanned assessor maps through ORMAP

[DEQ's Privacy Notice] [Contact DEQ] [Application Feedback]

Oregon DEQ

Environmental Cleanup Site Information (ECSI) Database
Site Summary Report - Details for Site ID 2483

This report shows data entered as of February 8, 2005 at 12:28:08 PM

This report contains site details, organized into the following sections: 1) Site Photos (appears only if the site has photos); 2) General Site Information; 3) Site Characteristics; 4) Substance Contamination Information; 5) Investigative, Remedial and Administrative Actions; and 6) Site Environmental Controls (i.e., institutional or engineering controls; appears only if DEQ has applied one or more such controls to the site). A key to certain acronyms and terms used in the report appears at the bottom of the page.

Go to DEQ's Facility Profiler to see a site map as well is information on what other DEQ programs may be active at this site.

General Site Information

Site ID: 2483	Site Name: Ochoco Lumber Co.		CERCLIS No:
Address:	200 SE Combs Flat RD Prineville 97754		
	County: Crook		Region: Eastern
Other location information:			
	Investigation Status: Listed on CRL or Inventory	NPL Site: No	Orphan Site: No / Study Area: No
Property:	Twnshp/Range/Sect: 15S , 16E , 4		Tax Lots: 7200, 7300, 7101, Sec. 4C 2900
	Latitude: 44.2996 deg.	Longitude: -120.8246 deg.	Site Size: 77 acres
Other Site Names:			

Site Characteristics

General Site Description:	
Site History:	
Contamination Information:	(2/3/00 DMC/SAS) Site appeared on an EPA Site Discovery List 5/90 and in the internal DEQ Anti-Sapstain Report (but was not inspected); in addition, DEQ ER/HW staff inspected the mill 7/97, which eventually led to a DEQ fine for waste and used-oil management violations; report on petroleum-contaminated soil cleanups for three areas in DEQ/HW files. (1/14/04 DMC/SAS) Internal information received on the permanent mill closure and scheduled demolition during 2004.
Manner and Time of Release:	Past practice.
Hazardous Substances/Waste Types:	petroleum-contaminated soils (PCS)
Pathways:	Site is in a high-density well area; also in an area of mixed residential and industrial activity; site is fenced and posted no trespassing; creek passes through the property.
Environmental/Health Threats:	
Status of Investigative or Remedial Action:	(2/3/00 DMC/SAS) Some past site remediation has occurred; site screening recommended. (9/25/03 DMC/SAS) Site is inactive and will be monitored as a potential brownfield site for the future. (1/14/04 DMC/SAS) Recommend information request be sent. (3/8/04 DMC/SAS) Information Request sent on

2/23/04, RP has 30 days to respond.

Data Sources: 1. DEQ Anti-Sapstain Report (9/86). 2. EPA Site Discovery List (5/90). 3. DEQ ER/HW Inspection Report (7/97). 4. DEQ ER/SAS drivebys (1999/2000).

Substance Contamination Information

Substance	Media Contaminated	Concentration Level	Date Recorded
No information is available			

Investigative, Remedial and Administrative Actions

Action	Start Date	Compl. Date	Resp. Staff	Lead Pgm
Site Screening recommended (EV)	02/02/2000	02/02/2000	Daniel Crouse	SAS
Site added to database	02/03/2000		Daniel Crouse	SAS
SITE EVALUATION	02/28/2000	06/30/2004	Daniel Crouse	SAS
Listing Review completed	06/30/2004	06/30/2004	Daniel Crouse	SAS
PRELIMINARY ASSESSMENT EQUIVALENT	06/30/2004	06/30/2004	Daniel Crouse	SAS
Proposal for Confirmed Release List recommended	06/30/2004	06/30/2004	Daniel Crouse	SAS
Remedial Investigation recommended (RI)	06/30/2004	06/30/2004	Daniel Crouse	SAS
NEGOTIATIONS (Primary Action)	10/21/2004		Toby Scott	VCP
Facility proposed for Confirmed Release List	11/15/2004	11/15/2004	Cheryl Dempsey	SAS
Owner/operator comments received on listing notification	11/20/2004		John Dadoly	SAS
Facility placed on Confirmed Release List	01/10/2005	01/10/2005	Katie Robertson	SAS
Letter Agreement	01/13/2005		Toby Scott	VCP

Key to certain acronyms and terms in this report:
CERCLIS No.: The U.S. EPA's Hazardous Waste Site identification number, shown only if EPA has been involved at the site.
Region: DEQ divides the state into three regions, Eastern, Northwest, and Western; the regional office shown is responsible for site investigation/cleanup.
NPL Site: Is this site on EPA's National Priority List (i.e., a federal Superfund site)? (Y/N).
Orphan Site: Has DEQ's Orphan Program been active at this site? (Y/N). The Orphan Program uses state funds to clean up high-priority sites where owners and operators responsible for the contamination are absent, or are unable or unwilling to use their own resources for cleanup.
Study Area: Is this site a Study Area? (Y/N). Study Areas are groupings of individual ECSI sites that may be contributing to a larger, area-wide problem. ECSI assigns unique Site ID numbers to both individual sites and to Study Areas.
Pathways: A description of human or environmental resources that site contamination could affect.
Lead Pgm: This column refers to the Cleanup Program affiliation of the DEQ employee responsible for the action shown. SAS or SAP = Site Assessment; VCS or VCP = Voluntary Cleanup; ICP = Independent Cleanup; SRS or SRP = Site Response (enforcement cleanup); ORP = Orphan Program.

You may be able to obtain more information about this site by contacting Toby Scott at (541) 388-6146 x246 or via email at scott.toby@deq.state.or.us. If this does not work, you may contact Gil Wistar at (503) 229-5512, or via email at wistar.gil@deq.state.or.us or contact the Eastern regional office.

Leaking Underground Storage Tanks (LUST) Site Information

Leaking Underground Storage Tank (LUST) Site Information

Basic Incident Information

Log Nbr: **07-98-0019**
Site Name: OCHOCO LUMBER COMPANY
Address: COMBS FLAT RD
City: PRINEVILLE
Heating Oil Tank (HOT): N
Zip Code: 97754
Regulated Tank: **Y**
Status: **CLOSED**
Received Date: 4/8/1998
UST Facility Id: 7188
County: CROOK

Assessment Information

07-98-0019

Discovery Date: 4/7/1998
Discovery Method: DECOMMISSIONING
Cause Of Release: OVERFILL

Management Information

07-98-0019

Release Stopped Date: 4/6/1998
Cleanup Start Date: 4/6/1998
Cleanup End Date: 10/19/1998

Contaminant Impact Information

07-98-0019

Media / Contaminant	
Soil	DIESEL
	UNLEADED GASOLINE

Status Information

07-98-0019

Site Type: Soil Matrix Cleanup
Active Remediation:
Comp GW Monitoring:
Delineate GW:
GW Delineated:
File Status: No Further Action
Free Product Present:
Free Product Removed:
Vapors Present:
Vapors Controlled:
CAP Requested:
CAP Submitted:
CAP Approved:
Delineate Soil:
Soil Delineated: Y

Work Performed Information

07-98-0019

Work	Company	Begin Date	End Date
Tank Decommissioning	Environmental Consulting & Investigation	4/6/1998	

Reports Received Information

07-98-0019

Report Type	Received Date	Comment
20 Day Report	4/29/1998	
UST Decommissioning Checklist	4/29/1998	
UST Decommissioning Service Change	4/29/1998	

This information may not reflect current status of site.
For further detail, refer to the DEQ Regional Office file.

This page updated: October 23, 2001
DEQ Online is the official web site for the Oregon Department of Environmental Quality.

Back to ID Number Search

Company Name: **OCHOCO LUMBER CO** ID Number: **000732**
SIC Code Definition: **SAWMILLS & PLANING MILLS, GEN'L-MFG**
Location Address: **200 SE COMBS FLAT RD PRINEVILLE** Zip: **97754** County: **CROOK**
Manager: **BRUCE DAUCSAVAGE** Phone: **(541) 447-6296**

Chemical Trade Name	Most Hazardous Ingredient	PhysicalState	UNIT	MaxQnty	HazClass1	HazClass2	Storage1	Storage2
DIESEL FUEL	PETROLEUM MID-DISTILLATES	LIQUID	GALLONS	200-499	Flammable Liq. (73F<FP<141F)		TANK INSIDE BUILDING	

Enforcement Database Search Results

Data is current as of: 2/8/2005 at 3:50:22 PM PST.

The following 5 records match your search criteria. They are sorted alphabetically by legal name and inspector name and are presented in two tables (The first table displays 2 enforcement action records after 1997. The second table displays 3 enforcement action records prior to 1998).

TIP -- Change page orientation to landscape before printing this report.

Search Again

Enforcement Actions Initiated By Inspector and Issued to Source, 1998 to present

Enforcement Number	Program/Region	Source Name and Location	Inspector	Enforcement Staff	Enforcement Type	Violations	Issued	Penalty Paid
2000-059	Air Quality, ACDP Eastern Region	OCHOCO LUMBER COMPANY @ SAWMILL EAST OF JOHN DAY	HACK	ROOT	Notice of Civil Penalty Assessment	ACDP-Opacity and Emission Limits	10/1/2000	$1,500
1999-219	Air Quality, Title V Eastern Region	OCHOCO LUMBER COMPANY @ PRINEVILLE OR	MESSINA	ROOT	Notice of Civil Penalty Assessment and Department Order	Title V Violations	4/5/2000	$8,677

Total Records: 2

The following historical records match your search criteria for Enforcement actions prior to 1998.

Formal Enforcement Actions - 1997 and Prior

Enforcement Number	Program/Region	Source Name and Location	Inspector	Enforcement Staff	Enforcement Type	Violations	Issued	Penalty Paid
	Waste Mgmt, Hazardous Waste Eastern Region	OCHOCO LUMBER COMPANY @ Prineville	Ingalls	BACHMAN	Notice of Civil Penalty Assessment and Compliance Order	HW generator rules (used oil regulations).	12/19/1997	$4,200
	Air Quality, Title V Eastern Region	OCHOCO LUMBER COMPANY @	Messina	BACHMAN	Notice of Civil Penalty Assessment	Storage of friable asbestos thus violating Title V permit.	9/12/1997	$1,200
	Air Quality Eastern Region	THE OCHOCO LUMBER CO. @ Prineville	Messina	Messina	Mutual Agreement and Order	Title V Permit emission limits	5/14/1997	$0

Total Records: 3

Search again

For more information, please contact Deborah Nesbit at (503) 229-5340.

DEQ Online is the official Web site for the Oregon Department of Environmental Quality.
If you have questions or comments, please contact us.

Last updated: 02/08/2005 15:50:23

Notice of NonCompliance (NON) Database Search Results

The following 9 records match your search criteria. They are sorted alphabetically by legal name and inspector name and are presented in two tables (The first table displays 3 Notice of NonCompliance records issued from 1998 to the present. The second table displays 6 historical Notice of NonCompliance records issued prior to 1998.)

TIP -- Change page orientation to landscape before printing this screen.

Search Again

Notices of NonCompliance issued 1998 to present

Program/Region	Source Name	Staff Initials	Violation Date	NON Date	County	Location	Description	NON Class	Permit #
AIR QUALITY, TITLE V EASTERN REGION BEND	OCHOCO LUMBER COMPANY	FCM	6/30/1998	10/21/1998	CROOK	COMBS FLAT ROAD, PRINEVILLE COMBS FLAT ROAD, PRINEVILLE	FAILURE TO NOTIFY THE DEPARTMENT OF A PERMIT DEVIATION WITHIN THE REQUIRED TIME	Class 2	07-0005
AIR QUALITY, TITLE V EASTERN REGION BEND	OCHOCO LUMBER COMPANY - BRUCE DAUCSAVAGE	FM	8/12/1999	10/5/1999	CROOK	COMBS FLAT ROAD	FAILURE TO DEMONSTRATE COMPLIANCE W/GRAIN LOADING REQUIREMENT	Class 2	
AIR QUALITY, TITLE V EASTERN REGION BEND	OCHOCO LUMBER COMPANY, BRUCE DAUCSAVAGE	FM	1/1/1999	8/12/1999	CROOK	COMBS FLAT ROAD IN PRINEVILLE	NUMEROUS VIOLATIONS ON MONITORING AND REPORTING	Class 2	

Total Records: 3

The following historical records match your search criteria for Notice of NonCompliance records issued prior to 1998.

Notices of NonCompliance issued prior to 1998

Program/Region	Source Name	Staff Initials	Violation Date	NON Date	County	Location	Description	NON Class	Permit #
WASTE MGMT EASTERN REGION-BEND	OCHOCO LUMBER	JI	7/29/1997	10/6/1997	CROOK		HAZARDOUS WASTE VIOLATIONS	Class 1	
AIR QUALITY EASTERN REGION-BEND	OCHOCO LUMBER COMPANY	FCM	7/29/1997	8/11/1997	CROOK		OPEN STORAGE OF FRIABLE ASBESTOS	Class 1	07-0005
AIR QUALITY EASTERN REGION-BEND	OCHOCO LUMBER COMPANY	FM	7/22/1994	8/10/1994	CROOK		VIOLATED STEAMING RATE ON BOILERS	Class 2	07-0005
AIR QUALITY EASTERN REGION-BEND	OCHOCO LUMBER COMPANY	FM	8/2/1995	8/7/1995	CROOK		OPERATING ABOVE MAXIMUM STEAMING RA	Class 2	07-0005
AIR QUALITY EASTERN REGION-BEND	OCHOCO LUMBER COMPANY	FM	11/21/1996	2/19/1997	CROOK		GRAIN LOADING & MONITORING VIOLATIO	Class 2	07-0005
WASTE MGMT EASTERN REGION-BEND	OCHOCO LUMBER COMPANY	SHD	5/8/1997	5/29/1997	CROOK		FAILURE TO CONDUCT MONITORING/TESTS	Class 2	7188

Total Records: 6

Search Again

For more information, please contact Deborah Nesbit at (503) 229-5340.

DEQ Online is the official Web site for the Oregon Department of Environmental Quality.
If you have questions or comments, please contact us.

Last updated: 02/08/2005 15:52:36

Oregon DEQ Facility Profiler 2.0

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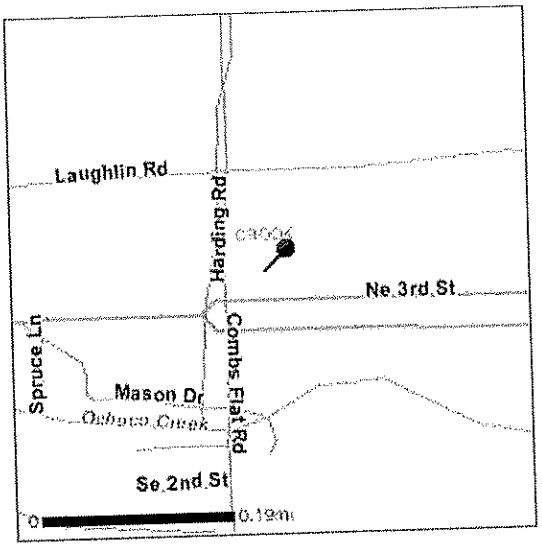
Facility Summary Report

Return to Site Listing Print Report

Maps



Facility / Site Information for Location 40919

Facility/Site Name:	OCHOCO SHELL STATION (FORMER)	**Latitude:**	44° 18' 11"
		Longitude:	-120° 49' 34"
Address:	E OCHOCO HWY & COMBS FLAT RD	**Location Accuracy:**	HIGH
		Last Updated:	6/17/2004
City State Zip:	PRINEVILLE OR 97754		

Aliases

Cross Street Station	ECSI	OCHOCO SHELL	LUST
OCHOCO SHELL	UST	Ochoco Shell Station (Former)	ECSI
Shell Bulk Plant - Prineville	ECSI	Shell Oil Bulk Plant (Former) - Prineville	ECSI

Geographic Features

Township:	T15S-R16E-S4	**Congress Dist:**	2	**Forest Type:**	N/A
County:	CROOK	**OR Senate Dist:**	28	**Vegetation:**	Agricultural cropland and pastureland
Watershed:	LOWER CROOKED	**OR House Dist:**	55	**Agricultural Land:**	PREDOM IRR

Oregon DEQ Program Information

Environmental Cleanup (ECSI)

Operation ID	Start Date	Issue Date	Expiration Date	Permit Type	Permit SubType	Status	Detail Information[1]	EPA Number
2582	04/14/2000			Contaminated Site		Listed on CRL or Inventory	ECSI Site Report	

SIC CODE	SIC Description	PRIMARY
5171	PETROLEUM BULK TERMINALS	N
5541	GASOLINE SERVICE STATIONS	N

Leaking Underground Storage Tanks (LUST)

Log Number	Received	Cleanup Initiated	Cleanup Complete	Type	Heating Oil Tank	UST Facility ID	Status	Detail Information[1]
07-95-0008	03/23/1995			REGULATED		6804	RELEASE_CONFIRMED	LUST Site Report
07-99-0058	11/23/1999	11/23/1999		REGULATED		6804	CLEANUP_STARTED	LUST Site Report

[1] Linked reports may be unavailable from 9:00pm to 7:00am PST due to system maintenance.

[2] DEQ does not maintain air discharge permit information for Lane County.

More Information on this location

Oregon DEQ Neighborhood Info (by region/county)
See wells in the same Township Range Section from the Oregon Water Resources Department Well logs Application
See county's scanned assessor maps through ORMAP

[DEQ's Privacy Notice] [Contact DEQ] [Application Feedback]

Oregon DEQ

Environmental Cleanup Site Information (ECSI) Database
Site Summary Report - Details for Site ID 2582

This report shows data entered as of February 8, 2005 at 12:29:08 PM

This report contains site details, organized into the following sections: 1) Site Photos (appears only if the site has photos); 2) General Site Information; 3) Site Characteristics; 4) Substance Contamination Information; 5) Investigative, Remedial and Administrative Actions; and 6) Site Environmental Controls (i.e., institutional or engineering controls; appears only if DEQ has applied one or more such controls to the site). A key to certain acronyms and terms used in the report appears at the bottom of the page.

Go to DEQ's Facility Profiler to see a site map as well is information on what other DEQ programs may be active at this site.

General Site Information

Site ID: 2582	Site Name: Shell Bulk Plant - Prineville		CERCLIS No:
Address:	E Ochoco Hwy & Combs Flat RD Prineville 97754		
	County: Crook		Region: Eastern
Other location information:			
	Investigation Status: Listed on CRL or Inventory	NPL Site: No	Orphan Site: No / Study Area: No
Property:	Twnshp/Range/Sect: 15S , 16E , 5		Tax Lots:
	Latitude: 44.3033 deg.	Longitude: -120.8262 deg.	Site Size:
Other Site Names:	Cross Street Station Ochoco Shell Station (Former) Shell Oil Bulk Plant (Former) - Prineville		

Site Characteristics

General Site Description:	
Site History:	
Contamination Information:	(2/2/00 RPS/VCS) Former site of a bulk plant and gasoline station. Currently a vacant lot. Prospective buyer hopes to construct a new service station, convenience store, and fast-food restaurant on the property starting Summer 2000. The bulk plant operated from about 1935 until 1981, and the service station from the 1930s through 1999. (1/9/2002 RPS/VCS) The bulk distribution plant included four 6,000-gallon and one 12,000-gallon above-ground storage tanks (ASTs). No underground storage tanks were used at the bulk plant. Petroleum products were originally off-loaded from the railroad, several hundred feet south of the site, and transferred to the bulk plant via underground pipe. More recently, the products were delivered to the bulk plant by truck. The service station had several underground petroleum storage tanks (USTs) of various sizes.
Manner and Time of Release:	Past business practices. Time of release(s) unknown.
Hazardous Substances/Waste Types:	Petroleum products.
Pathways:	
Environmental/Health Threats:	No substantial environmental or human health threats, based on soil sampling and ongoing groundwater sampling. This finding is also based on the assumption that the property will remain in commercial/industrial use.

Status of Investigative or Remedial Action: (5/9/00 RPS/VCS) Service station's USTs were removed in November 1999. Above ground tanks at bulk plant were removed sometime prior to that. March 2000: 1,500 tons of petroleum-contaminated soil were removed from the site. Clean fill was placed in the excavation pits. Site is currently bare ground. May 2000: Nine push-probe borings were installed for soil and groundwater analysis. Following review of these results, permanent GW monitoring wells will be installed summer 2000. Recommended action: groundwater monitoring at a minimum, and possibly active remediation. (4/13/01 RPS/VCS) Service station/convenience store was built summer 2000. Groundwater monitoring (two of four planned quarters have been completed) indicates no exceedance of RBCs. (1/9/2002 RPS/VCS) Comment period for NFA begins. NFA will be issued provided that a deed restriction prohibiting residential development is first placed on the property.

Data Sources: (4/24/02 RPS/VCS) Reports for four rounds of groundwater monitoring conducted in August 2000, December 2000, April 2001, and July 2001. Also: April 26 2000: Report on Soil Excavation and Risk-Based Corrective Action Evaluation for Former Ochoco Shell Site; August 25, 2000: Report on Groundwater, Risk-Based Corrective Action Evaluation for Former Ochoco Shell Site. These risk assessments were updated in the subsequent quarterly groundwater reports. All reports were prepared by Environmental Consulting and Investigation, Bend, OR.

Substance Contamination Information

Substance	Media Contaminated	Concentration Level	Date Recorded
BENZENE	Soil	0.5 mg/kg max	3/1/2000
BENZENE	Soil	2.8 ug/l max	8/1/2000
ETHYLBENZENE	Groundwater	100 ug/l max	8/1/2000
ETHYLBENZENE	Soil	17 mg/kg max	3/1/2000
TOLUENE	Groundwater	1.9 ug/l max	8/1/2000
TOLUENE	Soil	1.3 mg/kg max	3/1/2000
XYLENEs	Groundwater	570 ug/l max	8/1/2000
XYLENEs	Soil	105 mg/kg max	3/1/2000

Investigative, Remedial and Administrative Actions

Action	Start Date	Compl. Date	Resp. Staff	Lead Pgm
Letter Agreement	04/14/2000	04/14/2000	Bob Schwarz	VCS
Site added to database	04/24/2000		John Koestler	SAS
SITE INVESTIGATION	05/02/2000		Bob Schwarz	VCS
PRELIMINARY ASSESSMENT EQUIVALENT	01/02/2002	01/09/2002	Bob Schwarz	VCS
No Further Action (Conditional) (Primary Action)	01/09/2002	08/07/2002	Bob Schwarz	VCS
Proposal for Confirmed Release List recommended	01/09/2002	01/09/2002	Bob Schwarz	VCS
Proposal for Inventory recommended	01/09/2002	01/09/2002	Bob Schwarz	VCS
Facility proposed for Inventory	04/30/2002	04/30/2002	Kim Van Patten	VCS
Facility proposed for Confirmed Release List	04/30/2002	04/30/2002	Kim Van Patten	VCS
Facility placed on Confirmed Release List	08/15/2002	08/15/2002	Kim Van Patten	VCS
Facility placed on Inventory	08/15/2002	08/15/2002	Kim Van Patten	VCS
Periodic Review	04/30/2004	05/14/2004	Daniel Crouse	SAS

Site Environmental Controls

Control Description	Begin Date	End Date	Last Reviewed By	Last Review Date
Use Restriction Land	08/07/2002		Bob Schwarz	07/16/2003

Comments: No residential development (Easement and Equitable servitude recorded by Crook County, Aug. 7, 2002).

Key to certain acronyms and terms in this report:
CERCLIS No.: The U.S. EPA's Hazardous Waste Site identification number, shown only if EPA has been involved at the site.
Region: DEQ divides the state into three regions, Eastern, Northwest, and Western; the

regional office shown is responsible for site investigation/cleanup.
NPL Site: Is this site on EPA's National Priority List (i.e., a federal Superfund site)? (Y/N).
Orphan Site: Has DEQ's Orphan Program been active at this site? (Y/N). The Orphan Program uses state funds to clean up high-priority sites where owners and operators responsible for the contamination are absent, or are unable or unwilling to use their own resources for cleanup.
Study Area: Is this site a Study Area? (Y/N). Study Areas are groupings of individual ECSI sites that may be contributing to a larger, area-wide problem. ECSI assigns unique Site ID numbers to both individual sites and to Study Areas.
Pathways: A description of human or environmental resources that site contamination could affect.
Lead Pgm: This column refers to the Cleanup Program affiliation of the DEQ employee responsible for the action shown. SAS or SAP = Site Assessment; VCS or VCP = Voluntary Cleanup; ICP = Independent Cleanup; SRS or SRP = Site Response (enforcement cleanup); ORP = Orphan Program.

You may be able to obtain more information about this site by contacting Bob Schwarz at (541) 298-7255 x30 or via email at schwarz.bob@deq.state.or.us. If this does not work, you may contact Gil Wistar at (503) 229-5512, or via email at wistar.gil@deq.state.or.us or contact the Eastern regional office.

Leaking Underground Storage Tanks (LUST) Site Information

Leaking Underground Storage Tank (LUST) Site Information

Basic Incident Information

Log Nbr: **07-95-0008**
Site Name: OCHOCO SHELL
Address: E OCHOCO HWY & COMBS FLAT RD
City: PRINEVILLE Zip Code: 97754
Heating Oil Tank (HOT): N Regulated Tank: **Y**

Status: **ACTIVE**
Received Date: 3/23/1995
UST Facility Id: 6804
County: CROOK

Assessment Information

07-95-0008

Discovery Date: 3/23/1995 Discovery Method: SITE ASSESSMENT Cause Of Release: UNKNOWN

No Management Information For This Incident 07-95-0008

Contaminant Impact Information

07-95-0008

Media / Contaminant

Soil DIESEL
MISC. GASOLINE

Status Information

07-95-0008

Site Type: Unknown
Active Remediation:
Comp GW Monitoring:
Delineate GW:
GW Delineated:

File Status: Active - Unassigned
Free Product Present:
Free Product Removed:
Vapors Present:
Vapors Controlled:

CAP Requested:
CAP Submitted:
CAP Approved:
Delineate Soil:
Soil Delineated: Y

No Work Performed Information Entered For This Incident 07-95-0008

No Reports Received Information Entered For This Incident 07-95-0008

This information may not reflect current status of site.
For further detail, refer to the DEQ Regional Office file.

Leaking Underground Storage Tanks (LUST) Site Information

Leaking Underground Storage Tank (LUST) Site Information

Basic Incident Information

Log Nbr: **07-99-0058**
Site Name: OCHOCO SHELL
Address: E OCHOCO HWY & COMBS FLAT RD
City: PRINEVILLE
Zip Code: 97754
Heating Oil Tank (HOT): N
Regulated Tank: **Y**

Status: **ACTIVE**
Received Date: 11/23/1999
UST Facility Id: 6804
County: CROOK

Assessment Information

07-99-0058

Discovery Date: 11/23/1999
Discovery Method: DECOMMISSIONING
Cause Of Release: UNKNOWN

Management Information

07-99-0058

Release Stopped Date: 11/23/1999
Cleanup Start Date: 11/23/1999
Cleanup End Date:

Contaminant Impact Information

07-99-0058

Media	Contaminant
Groundwater	DIESEL
	MISC. GASOLINE
Soil	DIESEL
	MISC. GASOLINE

Status Information

07-99-0058

Site Type: Groundwater
Active Remediation:
Comp GW Monitoring:
Delineate GW:
GW Delineated:

File Status: Active - Unassigned
Free Product Present:
Free Product Removed:
Vapors Present:
Vapors Controlled:

CAP Requested:
CAP Submitted:
CAP Approved:
Delineate Soil:
Soil Delineated:

No Work Performed Information Entered For This Incident 07-99-0058

No Reports Received Information Entered For This Incident 07-99-0058

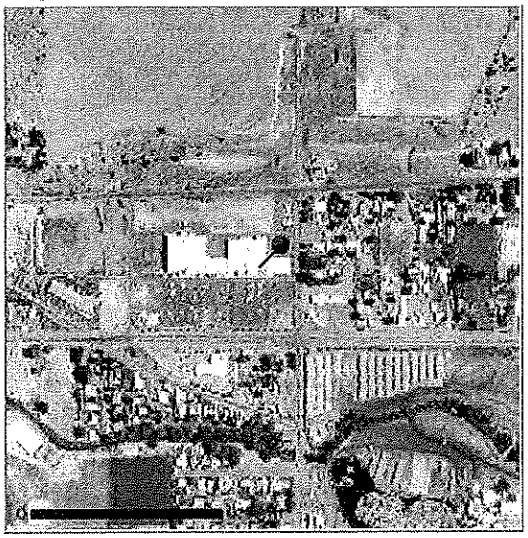
This information may not reflect current status of site.
For further detail, refer to the DEQ Regional Office file.

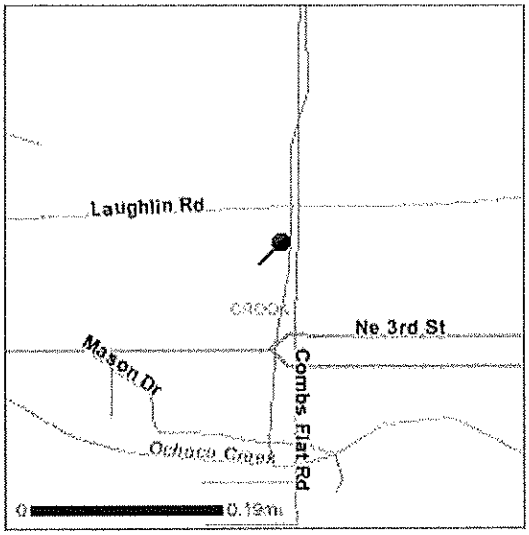
Oregon DEQ Facility Profiler 2.0

Facility Summary Report

Return to Site Listing Print Report

Maps





Facility / Site Information for Location 41185

Facility/Site Name:	OCHOCO PLAZA CLEANERS & FORMAL WEAR	**Latitude:**	44° 18' 14"
		Longitude:	-120° 49' 39.7"
Address:	1555 E 3RD ST	**Location Accuracy:**	HIGH
City State Zip:	PRINEVILLE OR 97754	**Last Updated:**	5/19/2004

Aliases

Ochoco Plaza Cleaners & Formal Wear	ECSI

Geographic Features

Township:	T15S-R16E-S5	**Congress Dist:**	2	**Forest Type:**	N/A
County:	CROOK	**OR Senate Dist:**	28	**Vegetation:**	Agricultural cropland and pastureland
Watershed:	LOWER CROOKED	**OR House Dist:**	55	**Agricultural Land:**	PREDOM IRR

Oregon DEQ Program Information

Environmental Cleanup (ECSI)

Operation ID	Start Date	Issue Date	Expiration Date	Permit Type	Permit SubType	Status	Detail Information[1]	EPA Number
2969	02/21/2001			Contaminated Site		No further action required	ECSI Site Report	

SIC CODE	SIC Description	PRIMARY
7216	DRY CLEANING PLANTS (NO RUGS)	Y

[1] Linked reports may be unavailable from 9:00pm to 7:00am PST due to system maintenance.

[2] DEQ does not maintain air discharge permit information for Lane County.

More Information on this location

Oregon DEQ Neighborhood Info (by region/county)
See wells in the same Township Range Section from the Oregon Water Resources Department Well logs Application
See county's scanned assessor maps through ORMAP

[DEQ's Privacy Notice] [Contact DEQ] [Application Feedback]

Oregon DEQ

Environmental Cleanup Site Information (ECSI) Database
Site Summary Report - Details for Site ID 2969

This report shows data entered as of February 8, 2005 at 12:30:13 PM

This report contains site details, organized into the following sections: 1) Site Photos (appears only if the site has photos); 2) General Site Information; 3) Site Characteristics; 4) Substance Contamination Information; 5) Investigative, Remedial and Administrative Actions; and 6) Site Environmental Controls (i.e., institutional or engineering controls; appears only if DEQ has applied one or more such controls to the site). A key to certain acronyms and terms used in the report appears at the bottom of the page.

Go to DEQ's Facility Profiler to see a site map as well is information on what other DEQ programs may be active at this site.

General Site Information

Site ID: 2969	Site Name: Ochoco Plaza Cleaners & Formal Wear		CERCLIS No:
Address:	1555 E 3rd ST Prineville 97754		
	County: Crook		Region: Eastern
Other location information:			
	Investigation Status: No further action required	NPL Site: No	Orphan Site: No / Study Area: No
Property:	Twnshp/Range/Sect: 15S , 16E , 5		Tax Lots:
	Latitude: 44.3039 deg.	Longitude: -120.8277 deg.	Site Size:

Other Site Names:

Site Characteristics

General Site Description:	
Site History:	
Contamination Information:	(2/20/01 DMC/SAS) Site added to database for tracking purposes as a dry cleaner. (10/12/01 JM/HW) Only current operating dry cleaner in Prineville. Newer facility, but first owner did not install secondary containment as required. New owner did this recently.
Manner and Time of Release:	
Hazardous Substances/Waste Types:	
Pathways:	
Environmental/Health Threats:	
Status of Investigative or Remedial Action:	(1/9/02 DMC/SAS) Newer facility that has installed secondary containment as required by ER/HW. Referral to ER/HW recommended; no further action for ER/SAS.
Data Sources:	1. Prineville Directory (1998). 2. ER/HW staff (10/12/01).

Substance Contamination Information

Substance	Media Contaminated	Concentration Level	Date Recorded

No information is available

Investigative, Remedial and Administrative Actions

Action	Start Date	Compl. Date	Resp. Staff	Lead Pgm
Site added to database	02/21/2001		Daniel Crouse	SAS

Site Screening recommended (EV)	02/21/2001 02/21/2001	Daniel Crouse	SAS
Refer to RCRA Program	07/24/2001 07/24/2001	John Mackellar	HW
SITE EVALUATION	07/24/2001 01/09/2002	Daniel Crouse	SAS
NO FURTHER STATE ACTION REQUIRED (Primary Action)	01/09/2002 01/09/2002	Daniel Crouse	SAS

Key to certain acronyms and terms in this report:
CERCLIS No.: The U.S. EPA's Hazardous Waste Site identification number, shown only if EPA has been involved at the site.
Region: DEQ divides the state into three regions, Eastern, Northwest, and Western; the regional office shown is responsible for site investigation/cleanup.
NPL Site: Is this site on EPA's National Priority List (i.e., a federal Superfund site)? (Y/N).
Orphan Site: Has DEQ's Orphan Program been active at this site? (Y/N). The Orphan Program uses state funds to clean up high-priority sites where owners and operators responsible for the contamination are absent, or are unable or unwilling to use their own resources for cleanup.
Study Area: Is this site a Study Area? (Y/N). Study Areas are groupings of individual ECSI sites that may be contributing to a larger, area-wide problem. ECSI assigns unique Site ID numbers to both individual sites and to Study Areas.
Pathways: A description of human or environmental resources that site contamination could affect.
Lead Pgm: This column refers to the Cleanup Program affiliation of the DEQ employee responsible for the action shown. SAS or SAP = Site Assessment; VCS or VCP = Voluntary Cleanup; ICP = Independent Cleanup; SRS or SRP = Site Response (enforcement cleanup); ORP = Orphan Program.

You may be able to obtain more information about this site by contacting Daniel Crouse at (541) 298-7255 x31 or via email at crouse.dan@deq.state.or.us. If this does not work, you may contact Gil Wistar at (503) 229-5512, or via email at wistar.gil@deq.state.or.us or contact the Eastern regional office.

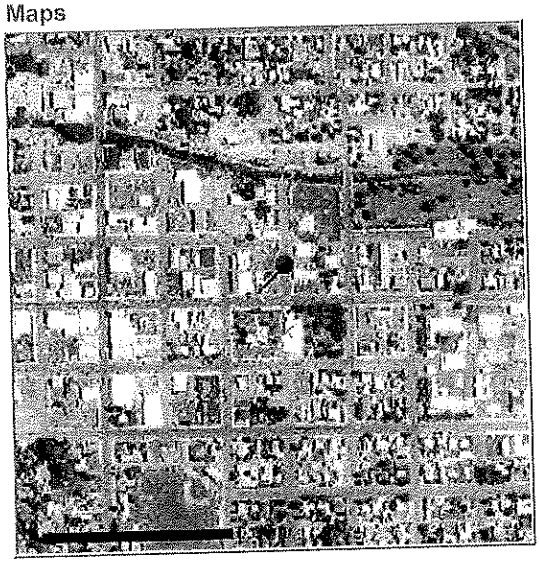
Oregon DEQ Facility Profiler 2.0

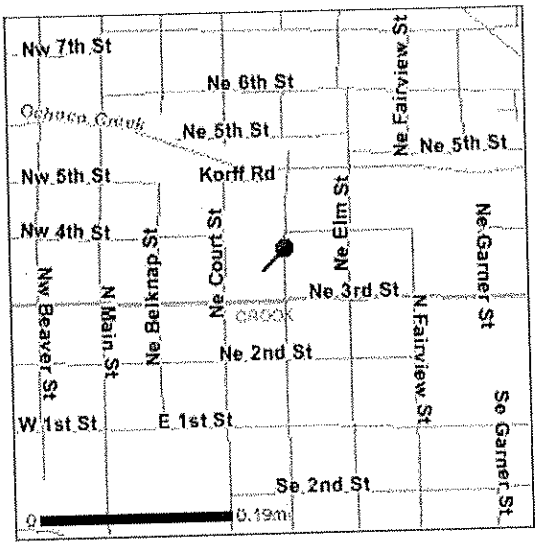
[Help] [Close Window]

Facility Summary Report

Return to Site Listing Print Report

Maps





Facility / Site Information for Location 20077

Facility/Site Name:	BRYAN GOLD'S TEXACO	**Latitude:**	44° 18' 11.2"
Address:	341 E 3RD ST	**Longitude:**	-120° 50' 37.7"
City State Zip:	PRINEVILLE OR 97754	**Location Accuracy:**	HIGH
		Last Updated:	5/19/2004

Aliases

BRYAN GOLD'S TEXACO	LUST	BRYAN GOLD'S TEXACO	UST
Texaco Service Station - Prineville	ECSI		

Geographic Features

Township:	T15S-R16E-S5	**Congress Dist:**	2	**Forest Type:**	N/A
County:	CROOK	**OR Senate Dist:**	28	**Vegetation:**	Agricultural cropland and pastureland
Watershed:	LOWER CROOKED	**OR House Dist:**	55	**Agricultural Land:**	N/A

Oregon DEQ Program Information

Environmental Cleanup (ECSI)

Operation ID	Start Date	Issue Date	Expiration Date	Permit Type	Permit SubType	Status	Detail Information[1]	EPA Number
2145	12/02/1997			Contaminated Site		Listed on CRL or Inventory	ECSI Site Report	

SIC CODE	SIC Description	PRIMARY
5541	GASOLINE SERVICE STATIONS	Y

Leaking Underground Storage Tanks (LUST)

Log Number	Received	Cleanup Initiated	Cleanup Complete	Type	Heating Oil Tank	UST Facility ID	Status	Detail Information[1]
07-97-0055	11/28/1997			REGULATED		3107	RELEASE_CONFIRMED	LUST Site Report

[1] Linked reports may be unavailable from 9:00pm to 7:00am PST due to system maintenance.
[2] DEQ does not maintain air discharge permit information for Lane County.

More Information on this location

Oregon DEQ Neighborhood Info (by region/county)
See wells in the same Township Range Section from the Oregon Water Resources Department Well logs Application

Profiler Site Summary Report

See county's scanned assessor maps through ORMAP

[DEQ's Privacy Notice] [Contact DEQ] [Application Feedback]

Oregon DEQ

Environmental Cleanup Site Information (ECSI) Database
Site Summary Report - Details for Site ID 2145

This report shows data entered as of February 8, 2005 at 12:49:15 PM

This report contains site details, organized into the following sections: 1) Site Photos (appears only if the site has photos); 2) General Site Information; 3) Site Characteristics; 4) Substance Contamination Information; 5) Investigative, Remedial and Administrative Actions; and 6) Site Environmental Controls (i.e., institutional or engineering controls; appears only if DEQ has applied one or more such controls to the site). A key to certain acronyms and terms used in the report appears at the bottom of the page.

Go to DEQ's Facility Profiler to see a site map as well is information on what other DEQ programs may be active at this site.

General Site Information

Site ID: 2145	Site Name: Texaco Service Station - Prineville		CERCLIS No:
Address:	341 E 3rd ST Prineville 97754		
	County: Crook		Region: Eastern
Other location information:			
	Investigation Status: Listed on CRL or Inventory	NPL Site: No	Orphan Site: No / Study Area: No
Property:	Twnshp/Range/Sect: 15S , 16E , 5		Tax Lots: 7901 & 8001
	Latitude: 44.3031 deg.	Longitude: -120.8438 deg.	Site Size: <1 acre
Other Site Names:			

Site Characteristics

General Site Description:	
Site History:	
Contamination Information:	(1/27/98 RPS/VCS) Sampling performed as part of an areawide groundwater investigation to determine the source of vapors in nearby businesses. At this site, petroleum hydrocarbons and volatile organic compounds have been detected in soil and groundwater.
Manner and Time of Release:	Leaking underground storage tanks (USTs); time of release unknown.
Hazardous Substances/Waste Types:	petroleum
Pathways:	
Environmental/Health Threats:	Indoor air and groundwater contamination.
Status of Investigative or Remedial Action:	(9/26/03 RPS/VCS) Since 1997, DEQ has been conducting investigation and cleanup activities to address gasoline contamination originating from this property. The most significant impact of this contamination has been unacceptable levels of gasoline vapors inside neighboring buildings. Activities conducted by the property owner, under DEQ oversight, included installation of six on-site groundwater monitoring wells in December 1997, sampling and analysis of groundwater from these wells, and removal of three 4,000-gallon underground storage tanks in January 1998. Following removal of the tanks, the owner attempted to treat the contaminated soil in place using enhanced biodegradation. This process involved injection of water, nutrients and microbes. The owner

discontinued this treatment after determining it was not effective. The contaminated soil, as well as subsurface piping installed for injection of the soil treatment materials, remain on the property. DEQ has conducted extensive investigation and remediation in the area affected by contamination that has migrated from the property. These activities have included groundwater monitoring, soil gas monitoring, indoor air sampling, installation and operation of vapor extraction systems beneath two affected buildings, and construction and operation of a soil vapor extraction system and multi-phase extraction system serving an area of about 100,000 square feet. In June 2003, the U.S. Environmental Protection Agency (EPA) awarded the City of Prineville a Brownfield grant to assist with the cleanup of the former Prineville Texaco property. Under this grant, and according to the terms of a Prospective Purchaser Agreement, the city has agreed to work under DEQ oversight to perform the following measures: 1) excavate contaminated soil that remains on site and dispose of it properly; 2) replace up to four groundwater monitoring wells that will be removed during soil excavation activities; 3) conduct of groundwater monitoring to evaluate groundwater contaminant levels following removal of contaminated soil; 4) conduct indoor air monitoring to assess whether exposure to gasoline constituents exceeds acceptable levels; 5) if necessary, extend the existing soil vapor extraction system to treat the area around the former tank nest on the Texaco property, and install an air-sparge system to serve this area; 6) relocate the existing treatment plant as necessary to accommodate redevelopment activities; and 7) conduct a risk assessment to determine whether further remedial action is needed to reduce contaminant concentrations to acceptable risk levels.

Data Sources:

Substance Contamination Information

Substance	Media Contaminated	Concentration Level	Date Recorded
BENZENE	Groundwater	17750 mg/l	12/18/1997
CHLOROFORM	Groundwater	1020 mg/l	12/18/1997
ETHYLBENZENE	Groundwater	15250 mg/l	12/18/1997
METHYLSTYRENE,alpha-	Groundwater	820 mg/l	12/18/1997
NAPHTHALENE	Groundwater	6800 mg/l	12/18/1997
TOLUENE	Groundwater	70630 mg/l	12/18/1997
XYLENEs	Groundwater	61630 mg/l	12/18/1997

Investigative, Remedial and Administrative Actions

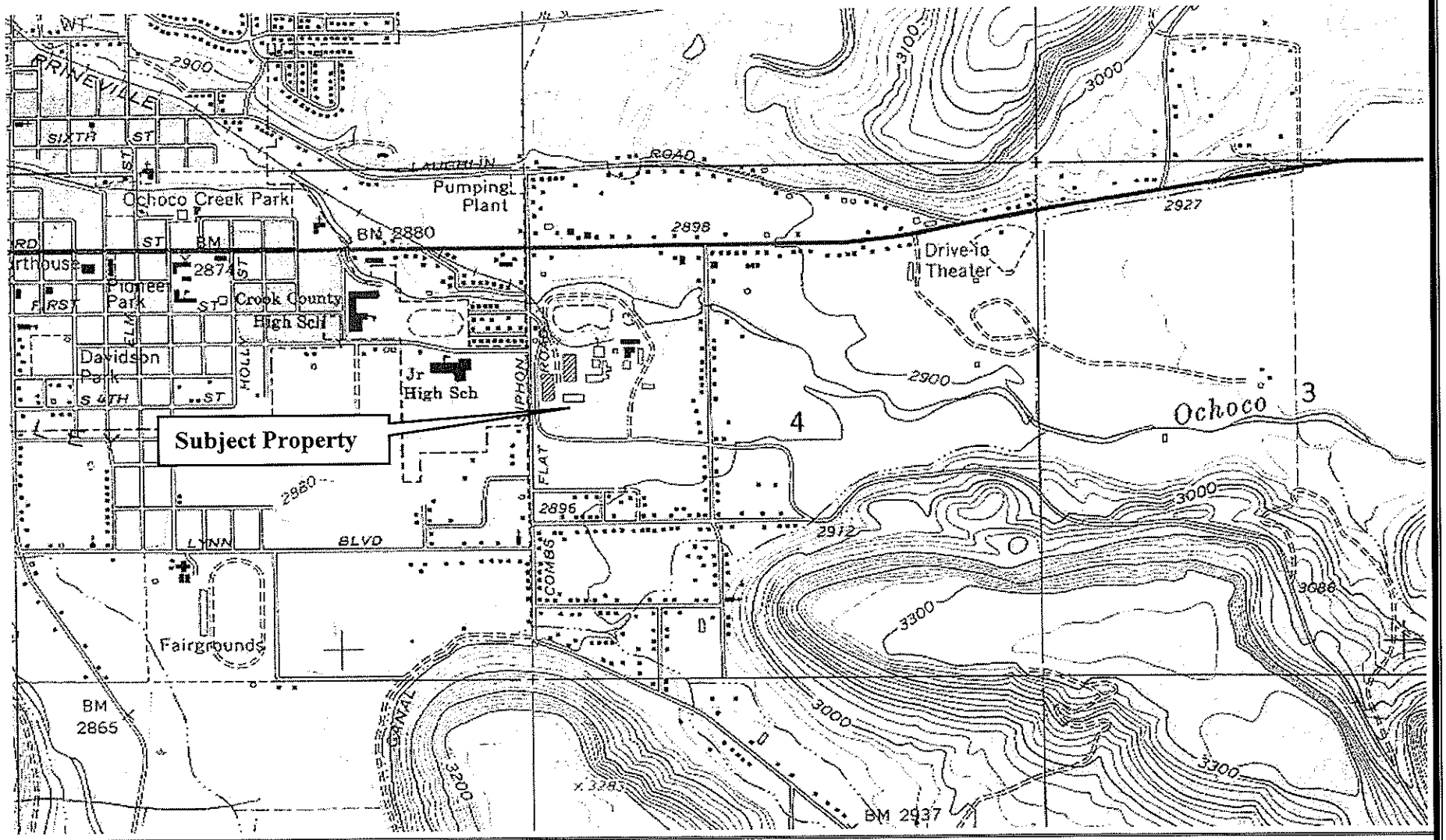
Action	Start Date	Compl. Date	Resp. Staff	Lead Pgm
NEGOTIATIONS	12/02/1997	12/11/1997	Bob Schwarz	VCS
SITE EVALUATION	12/11/1997	12/25/1997	Bob Schwarz	VCS
Letter Agreement	12/11/1997	12/11/1997	Bob Schwarz	VCS
Site added to database	12/23/1997		Bob Schwarz	VCS
Listing Review completed	12/25/1997	12/25/1997	Bob Schwarz	VCS
Insufficient information to list	12/25/1997	02/17/1998	Bob Schwarz	VCS
Removal Action Recommended (RM)	12/25/1997	12/25/1997	Bob Schwarz	VCS
REMOVAL	12/26/1997		Bob Schwarz	VCS
Proposal for Confirmed Release List recommended	02/17/1998	02/17/1998	Bob Schwarz	VCS
Facility proposed for Confirmed Release List	05/27/1998	05/27/1998	Kim Van Patten	VCS
REMEDIAL INVESTIGATION (Primary Action)	06/25/1998		Toby Scott	VCS
Owner/operator comments received on listing notification	07/24/1998	07/24/1998	Kim Van Patten	VCS
Facility placed on Confirmed Release List	08/20/1998	08/20/1998	Kim Van Patten	VCS
Prospective Purchaser Agreement	06/26/2003	09/26/2003	Bob Schwarz	VCS

Key to certain acronyms and terms in this report:
CERCLIS No.: The U.S. EPA's Hazardous Waste Site identification number, shown only if EPA

has been involved at the site.
Region: DEQ divides the state into three regions, Eastern, Northwest, and Western; the regional office shown is responsible for site investigation/cleanup.
NPL Site: Is this site on EPA's National Priority List (i.e., a federal Superfund site)? (Y/N).
Orphan Site: Has DEQ's Orphan Program been active at this site? (Y/N). The Orphan Program uses state funds to clean up high-priority sites where owners and operators responsible for the contamination are absent, or are unable or unwilling to use their own resources for cleanup.
Study Area: Is this site a Study Area? (Y/N). Study Areas are groupings of individual ECSI sites that may be contributing to a larger, area-wide problem. ECSI assigns unique Site ID numbers to both individual sites and to Study Areas.
Pathways: A description of human or environmental resources that site contamination could affect.
Lead Pgm: This column refers to the Cleanup Program affiliation of the DEQ employee responsible for the action shown. SAS or SAP = Site Assessment; VCS or VCP = Voluntary Cleanup; ICP = Independent Cleanup; SRS or SRP = Site Response (enforcement cleanup); ORP = Orphan Program.

You may be able to obtain more information about this site by contacting Toby Scott at (541) 388-6146 x246 or via email at scott.toby@deq.state.or.us. If this does not work, you may contact Gil Wistar at (503) 229-5512, or via email at wistar.gil@deq.state.or.us or contact the Eastern regional office.

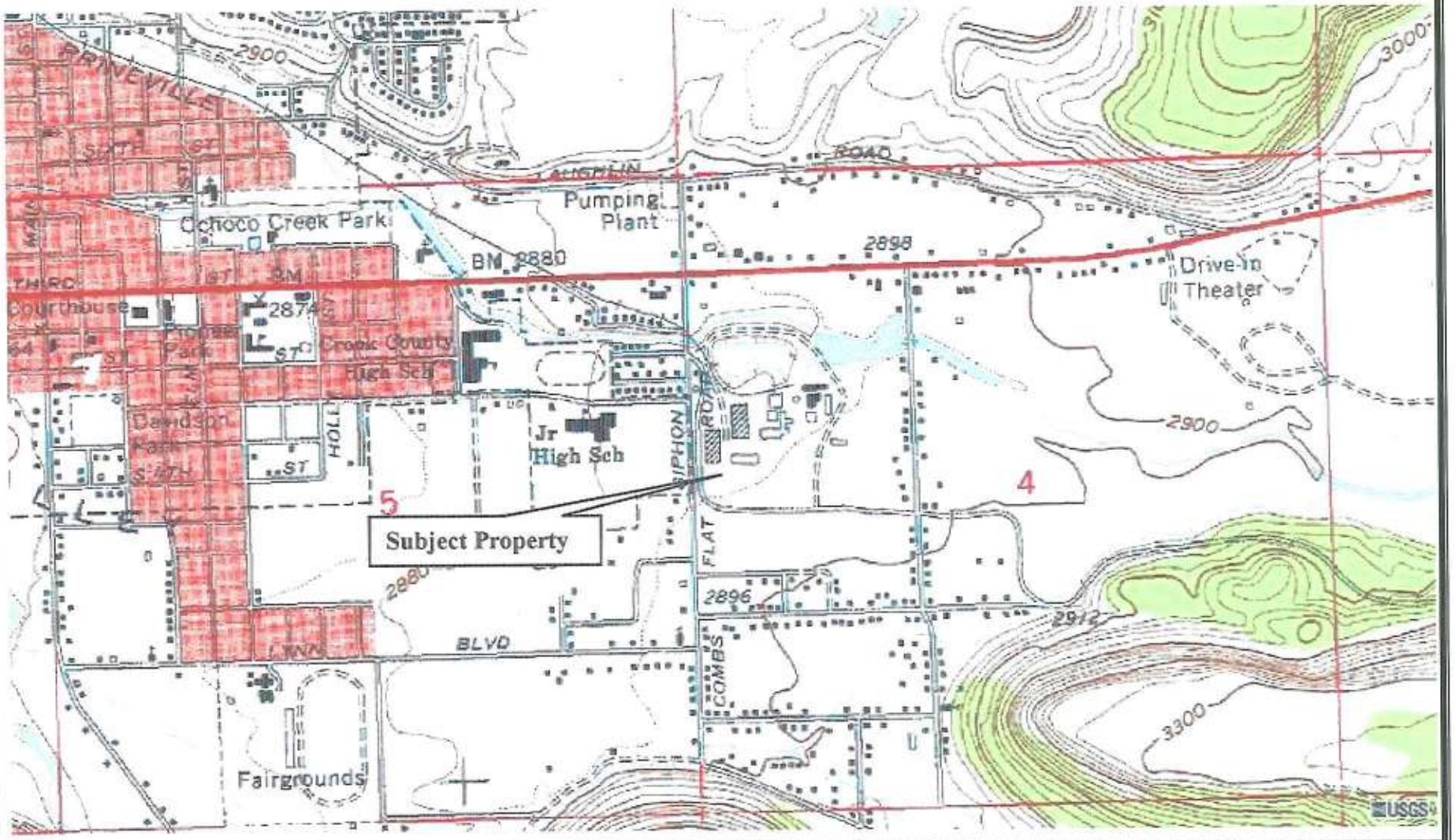
Appendix C
Historic Maps



OSPREY
Environmental, LLC

1962 Topographic Map – Ochoco Lumber
200 SE Combs Flat Road
Prineville, OR 97754

Project No.:	Scale:	Date:	Figure:
O002-1	**Not to Scale**	**April 2005**	**C1**



OSPREY
Environmental, LLC

1992 Topographic Map – Ochoco Lumber
200 SE Combs Flat Road
Prineville, OR 97754

Project No.:	Scale:	Date:	Figure:
O002-1	**Not to Scale**	**April 2005**	**C2**

Appendix D

Well Logs

CROO 51198

15S/16E/04

STATE OF OREGON
WATER WELL REPORT
(as required by ORS 537.765)

S L M well

(START CARD) #

(1) OWNER:
Well Number:
Name Ochoco Lumber Co
Address P.O. Box 668
City Prineville State OR. Zip 97754

(2) TYPE OF WORK:
☒ New Well ☐ Deepen ☐ Recondition ☐ Abandon

(3) DRILL METHOD
☐ Rotary Air ☐ Rotary Mud ☒ Cable
☐ Other

(4) PROPOSED USE:
☐ Domestic ☐ Community ☒ Industrial ☐ Irrigation
☐ Thermal ☐ Injection ☐ Other POTABLE WATER

(5) BORE HOLE CONSTRUCTION:
Special Construction approval Yes ☐ No ☒ Depth of Completed Well 240' ft.
Explosives used Yes ☐ No ☒ Type Amount

HOLE Diameter	From	To	SEAL Material	From	To	Amount sacks or pounds
10"	0	150	Cement	0	180	3 yds
8"	150	180				
6"	180	250				

How was seal placed: Method ☐ A ☐ B ☐ C ☐ D ☐ E
☐ Other Pumped Via tremie
Backfill placed from ft. to ft. Material
Gravel placed from ft. to ft. Size of gravel

(6) CASING/LINER:

	Diameter	From	To	Gauge	Steel	Plastic	Welded	Threaded
Casing:					☐	☐	☐	☐
	6"	+1	250	250	☒	☐	☒	☐
					☐	☐	☐	☐
					☐	☐	☐	☐
Liner:					☐	☐	☐	☐
					☐	☐	☐	☐

Final location of shoe(s)

(7) PERFORATIONS/SCREENS:
☒ Perforations Method Torch
☐ Screens Type Material

From	To	Slot size	Number	Diameter	Tele/pipe size	Casing	Liner
						☐	☐
230	246	1/8	300	6"		☒	☐
						☐	☐
						☐	☐
						☐	☐
						☐	☐

(8) WELL TESTS: Minimum testing time is 1 hour
☐ Pump ☒ Bailer ☐ Air ☐ Flowing Artesian

Yield gal/min	Drawdown	Drill stem at	Time
			1 hr.
50	22'	—	2 hrs

Temperature of water 65° Depth Artesian Flow Found
Was a water analysis done? ☐ Yes By whom
Did any strata contain water not suitable for intended use? ☐ Too little
☐ Salty ☐ Muddy ☒ Odor ☐ Colored ☐ Other
Depth of strata: 20'-40'

(9) LOCATION OF WELL by legal description:
County Crook Latitude Longitude
Township 16E N or S, Range 15 S E or W. WM.
Section 4 SE ¼ SW ¼
Tax Lot Lot Block Subdivision
Street Address of Well (or nearest address) Ochoco Lumber Co
Combs Flat Rd.

(10) STATIC WATER LEVEL:
35 ft. below land surface. Date 11-5-91
Artesian pressure lb. per square inch. Date

(11) WATER BEARING ZONES:
Depth at which water was first found

From	To	Estimated Flow Rate	SWL
232	237	50 gpm	35'

(12) WELL LOG:
Ground elevation

Material	From	To	SWL
Top Soil	0	9	
Brown Clay	9	20	
Gravel & Clay	20	45	
Sandy Black Clay	45	145	
Sticky Black Clay	145	232	35
1/2 to Sandy Gravel	232	237	"
Blue Clay	237	250	"

RECEIVED
OCT 14 1999
WATER RESOURCES DEPT.
SALEM, OREGON

Date started 11-1-91 Completed 11-4-91

(unbonded) Water Well Constructor Certification:
I certify that the work I performed on the construction, alteration, or abandonment of this well is in compliance with Oregon well construction standards. Materials used and information reported above are true to my best knowledge and belief.
WWC Number
Signed Date

(bonded) Water Well Constructor Certification:
I accept responsibility for the construction, alteration, or abandonment work performed on this well during the construction dates reported above. All work performed during this time is in compliance with Oregon well construction standards. This report is true to the best of my knowledge and belief.
WWC Number 711
Signed [signature] Date 11 91

ORIGINAL & FIRST COPY - WATER RESOURCES DEPARTMENT SECOND COPY - CONSTRUCTOR THIRD COPY - CUSTOMER

RECEIVED

JAN 0 6 2000

WATER RESOURCES DEPT.
SALEM, OREGON

STATE OF OREGON WATER SUPPLY WELL REPORT

(as required by ORS 537.765)

Crook 51196

Instructions for completing this report are on the last page of this form

WELL I.D. # L 31991

START CARD # 126026

(1) OWNER: Well Number 944

Name Ochoco Lumber Comp

Address PO Box 1668

City Prineville State OR Zip 97754

(2) TYPE OF WORK

☒ New Well ☐ Deepening ☐ Alteration (repair/recondition) ☐ Abandonment

(3) DRILL METHOD:

☐ Rotary Air ☒ Rotary Mud ☒ Cable ☐ Auger

☐ Other

(4) PROPOSED USE:

☐ Domestic ☐ Community ☒ Industrial ☐ Irrigation

☐ Thermal ☐ Injection ☐ Livestock ☐ Other

(5) BORE HOLE CONSTRUCTION:

Special Construction approval ☐ Yes ☒ No Depth of Completed Well 250 ft.

Explosives used ☐ Yes ☒ No Type Amount

HOLE Diameter	From	To	SEAL Material	From	To	Sacks or pounds
12"	0	223	Bentonite	0	5	4
			Cement	5	90	48
8"	223	250				

How was seal placed: Method ☐ A ☐ B ☒ C ☐ D ☐ E

☒ Other Poured Bentonite in Dry

Backfill placed from ft. to ft. Material

Gravel placed from ft. to ft. Size of gravel

(6) CASING/LINER:

	Diameter	From	To	Gauge	Steel	Plastic	Welded	Threaded
Casing:	8"	+½	238½	250	☒	☐	☒	☐
					☐	☐	☐	☐
					☐	☐	☐	☐
					☐	☐	☐	☐
Liner:					☐	☐	☐	☐
					☐	☐	☐	☐

Final location of shoe(s)

(7) PERFORATIONS/SCREENS:

☒ Perforations Method Factory

☐ Screens Type Material

From	To	Slot size	Number	Diameter	Tele/pipe size	Casing	Liner
228½	238½	3X⅛	152	8"		☒	☐
						☐	☐
						☐	☐
						☐	☐
						☐	☐

(8) WELL TESTS: Minimum testing time is 1 hour

☒ Pump ☐ Bailer ☐ Air ☐ Flowing Artesian

Yield gal/min	Drawdown	Drill stem at	Time
			1 hr.
100	40	140	24 hr

Temperature of water 68° Depth Artesian Flow Found

Was a water analysis done? ☐ Yes By whom

Did any strata contain water not suitable for intended use? ☐ Too little

☐ Salty ☐ Muddy ☐ Odor ☐ Colored ☐ Other

Depth of strata:

(9) LOCATION OF WELL by legal description:

County Crook Latitude Longitude

Township 15 N or (S) Range 16 (E) or W. WM.

Section 4B SW 1/4 NW 1/4

Tax Lot 2200 Lot Block Subdivision

Street Address of Well (or nearest address) Combs Flat Rd

(10) STATIC WATER LEVEL:

55 ft. below land surface. Date 10/25/99

Artesian pressure lb. per square inch. Date

(11) WATER BEARING ZONES:

Depth at which water was first found 223

From	To	Estimated Flow Rate	SWL
223	245	100+	55

(12) WELL LOG:

Ground Elevation

Material	From	To	SWL
Gravel	0	2	
Brown Clay Stone Hard	2	5	
Gravel	5	25	
Salt	25	84	55
~~Grout~~ Hard Blue Clay Stone	84	223	
Gravel	223	245	
Soft It Blue clay	245	250	

Date started 10/12/99 Completed 10/25/99

(unbonded) Water Well Constructor Certification:

I certify that the work I performed on the construction, alteration, or abandonment of this well is in compliance with Oregon water supply well construction standards. Materials used and information reported above are true to the best of my knowledge and belief.

WWC Number 1583

Signed David A Schlichting Date 11/1/99

(bonded) Water Well Constructor Certification:

I accept responsibility for the construction, alteration, or abandonment work performed on this well during the construction dates reported above. All work performed during this time is in compliance with Oregon water supply well construction standards. This report is true to the best of my knowledge and belief.

WWC Number 584

Signed Dan [illegible] Date 11-1-99

ORIGINAL – WATER RESOURCES DEPARTMENT FIRST COPY – CONSTRUCTOR SECOND COPY – CUSTOMER

STATE OF OREGON

WATER WELL REPORT

(as required by ORS 537.765)

JUL 10 1988

WATER RESOURCES DEPT
SALEM, OREGON

2183 CROO

155/16E-4b

Well Number 2065

(1) OWNER:

Name OCHOCO LUMBER CO.

Address P.O. Box 668

City Prineville, State OR Zip 97754

(2) TYPE OF WORK:

[X] New Well [ ] Deepen [ ] Recondition [ ] Abandon

(3) DRILL METHOD

[X] Rotary Air [ ] Rotary Mud [ ] Cable

[ ] Other

(4) PROPOSED USE:

[ ] Domestic [ ] Community [X] Industrial [ ] Irrigation

[ ] Thermal [ ] Injection [ ] Other

(5) BORE HOLE CONSTRUCTION:

Special Construction approval Yes [ ] No [X] Depth of Completed Well 231 ft.

Explosives used Yes [ ] No [X] Type ____ Amount ____

HOLE Diameter	From	To	SEAL Material	From	To	Amount sacks or pounds
14"	0	20	Cement	0	20	32 sacks
10	0	231	Bore			

How was seal placed: Method [ ] A [ ] B [X] C [ ] D [ ] E

[ ] Other

Backfill placed from ____ ft. to ____ ft. Material ____

Gravel placed from 215 ft. to 231 ft. Size of gravel 1/4"

(6) CASING/LINER:

	Diameter	From	To	Gauge	Steel	Plastic	Welded	Threaded
Casing:	10	0	70	250	[X]	[ ]	[X]	[ ]
					[ ]	[ ]	[ ]	[ ]
					[ ]	[ ]	[ ]	[ ]
					[ ]	[ ]	[ ]	[ ]
Liner:	8"	-2	232		[X]	[ ]	[X]	[ ]
					[ ]	[ ]	[ ]	[ ]

Final location of shoe(s) 70' on 10" pipe

(7) PERFORMATIONS/SCREENS:

[X] Perforations Method Torch

[ ] Screens Type ____ Material ____

From	To	Slot size	Number	Diameter	Tele/pipe size	Casing	Liner
215	231	1/4X6	75		8"	[ ]	[X]
						[ ]	[ ]
						[ ]	[ ]
						[ ]	[ ]
						[ ]	[ ]
						[ ]	[ ]

(8) WELL TESTS: Minimum testing time is 1 hour

[ ] Pump [ ] Bailer [X] Air [ ] Flowing Artesian

Yield gal/min	Drawdown	Drill stem at	Time
200 gpm		200	1 hr.

Temperature of water ____ Depth Artesian Flow Found ____

Was a water analysis done? [ ] Yes By whom ____

Did any strata contain water not suitable for intended use? [ ] Too little

[ ] Salty [ ] Muddy [ ] Odor [ ] Colored [ ] Other ____

Depth of strata: ____

(9) LOCATION OF WELL by legal description:

County Crook Latitude ____ Longitude ____

Township 15S N or S, Range 16E E or W, WM.

Section 4 NW 1/4 1/4

Tax Lot ____ Lot ____ Block ____ Subdivision ____

Street Address of Well (or nearest address) Combs Flat Rd.

(10) STATIC WATER LEVEL:

40 ft. below land surface. Date 5/25/88

Artesian pressure ____ lb. per square inch. Date ____

(11) WATER BEARING ZONES:

Depth at which water was first found ____

From	To	Estimated Flow Rate	SWL
228	235	200 gpm	40

(12) WELL LOG:

Ground elevation ____

Material	From	To	SWL
TOPSOIL	0	1	
BROWN CLAY	1	7	
CLAY, SAND & GRAVEL	7	17	
CEMENTED GRAVEL & CLAY	17	20	
SAND & GRAVEL & CLAY	20	25	
CEMENTED GRAVEL & CLAY	25	35	
BLUE SAND & SILT	35	65	
BLUE CLAY	65	85	
BLUE PACKED SAND & CLAY	85	227	
SAND & GRAVEL, Large	227	235	40

Date started 5/23/88 Completed 5/26/88

(unbonded) Water Well Constructor Certification:

I certify that the work I performed on the construction, alteration, or abandonment of this well is in compliance with Oregon well construction standards. Materials used and information reported above are true to my best knowledge and belief.

WWC Number ____

Signed [signature] Date 5/27/88

(bonded) Water Well Constructor Certification:

I accept responsibility for the construction, alteration, or abandonment work performed on this well during the construction dates reported above. all work performed during this time is in compliance with Oregon well construction standards. This report is true to the best of my knowledge and belief.

WWC Number 514

Signed Bert Jones Date 5/28/88

WHITE COPIES - WATER RESOURCES DEPARTMENT YELLOW COPY - CONSTRUCTOR PINK COPY - CUSTOMER 9809C 10/86

NOTICE TO WATER WELL CONTRACTOR
The original and first copy of this report are to be filed with the
STATE ENGINEER, SALEM, OREGON 97310
within 30 days from the date of well completion.

CROO 2006

RECEIVED APR 21 1967 STATE ENGINEER SALEM, OREGON

WATER WELL REPORT
STATE OF OREGON
(Please type or print)

State Well No. 15/16-4
State Permit No.

(1) OWNER:
Name Ochoco Lumber Co.
Address Ochoco Hwy.
Prineville Oregon

(2) LOCATION OF WELL:
County Crook Driller's well number 54
¼ ¼ Section 4 T. 15 S R. 16 E W.M.
Bearing and distance from section or subdivision corner

(3) TYPE OF WORK (check):
New Well ☒ Deepening ☐ Reconditioning ☐ Abandon ☐
If abandonment, describe material and procedure in Item 12.

(4) PROPOSED USE (check):
Domestic ☒ Industrial ☐ Municipal ☐
Irrigation ☐ Test Well ☐ Other ☐

(5) TYPE OF WELL:
Rotary ☐ Driven ☐
Cable ☒ Jetted ☐
Dug ☐ Bored ☐

(6) CASING INSTALLED: Threaded ☐ Welded ☒
6" Diam. from +3 ft. to 65 ft. Gage .250
" Diam. from -5 ft. to ft. Gage
" Diam. from ft. to ft. Gage

(7) PERFORATIONS: Perforated? ☒ Yes ☐ No
Type of perforator used Cutting torch
Size of perforations 1/16 in. by 10 in.
21 perforations from 55 ft. to 65 ft.
perforations from ft. to ft.
perforations from ft. to ft.
perforations from ft. to ft.
perforations from ft. to ft.

(8) SCREENS: Well screen installed? ☐ Yes ☒ No
Manufacturer's Name
Type Model No.
Diam. Slot size Set from ft. to ft.
Diam. Slot size Set from ft. to ft.

(9) CONSTRUCTION:
Well seal—Material used in seal Bentonite
Depth of seal 15 ft. Was a packer used? no
Diameter of well bore to bottom of seal 8 in.
Were any loose strata cemented off? ☐ Yes ☒ No Depth
Was a drive shoe used? ☐ Yes ☒ No
Was well gravel packed? ☐ Yes ☒ No Size of gravel:
Gravel placed from ft. to ft.
Did any strata contain unusable water? ☐ Yes ☒ No
Type of water? depth of strata
Method of sealing strata off

(10) WATER LEVELS:
Static level 20 ft. below land surface Date 4/14/67
Artesian pressure lbs. per square inch Date

(11) WELL TESTS: Drawdown is amount water level is lowered below static level
Was a pump test made? ☐ Yes ☒ No If yes, by whom?
Yield: gal./min. with ft. drawdown after hrs.
" " " "
" " " "
Bailer test 20 gal./min. with 10 ft. drawdown after 1 hrs.
Artesian flow g.p.m. Date
Temperature of water 62 Was a chemical analysis made? ☐ Yes ☒ No

(12) WELL LOG: Diameter of well below casing 6"
Depth drilled 85 ft. Depth of completed well 85 ft.
Formation: Describe by color, character, size of material and structure, and show thickness of aquifers and the kind and nature of the material in each stratum penetrated, with at least one entry for each change of formation.

MATERIAL	FROM	TO
5' froze soil		
Sandy clay	5	18
gravel	18	25
clay (red)	25	75
clay (brown)	75	85

Work started 4/13 1967 Completed 4/14 1967
Date well drilling machine moved off of well 4/14/ 1967

(13) PUMP:
Manufacturer's Name Berkeley
Type: jet H.P. 1

Water Well Contractor's Certification:
This well was drilled under my jurisdiction and this report is true to the best of my knowledge and belief.

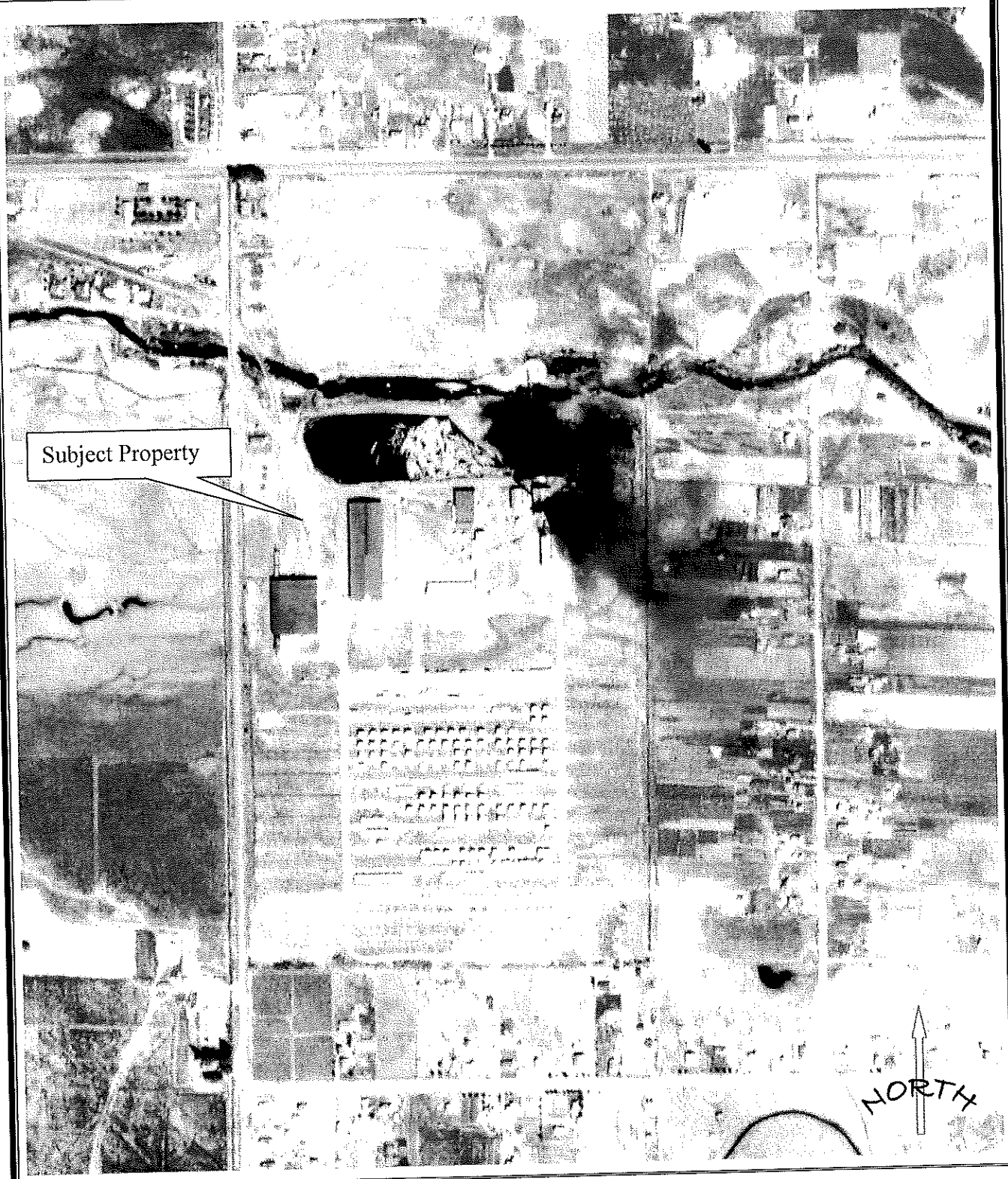
NAME Archie Fox Well Drilling
(Person, firm or corporation) (Type or print)
Address 2277 Lincoln Rd. Prineville Ore
Drilling Machine Operator's License No. 389
[Signed] Archie Fox
(Water Well Contractor)
Contractor's License No. 447 Date 4/18, 1967

(USE ADDITIONAL SHEETS IF NECESSARY)

54 15 16 E

Appendix E

Historic Aerial Photographs



1943 Aerial Photograph – Ochoco Lumber
200 SE Combs Flat Road
Prineville, OR 97754

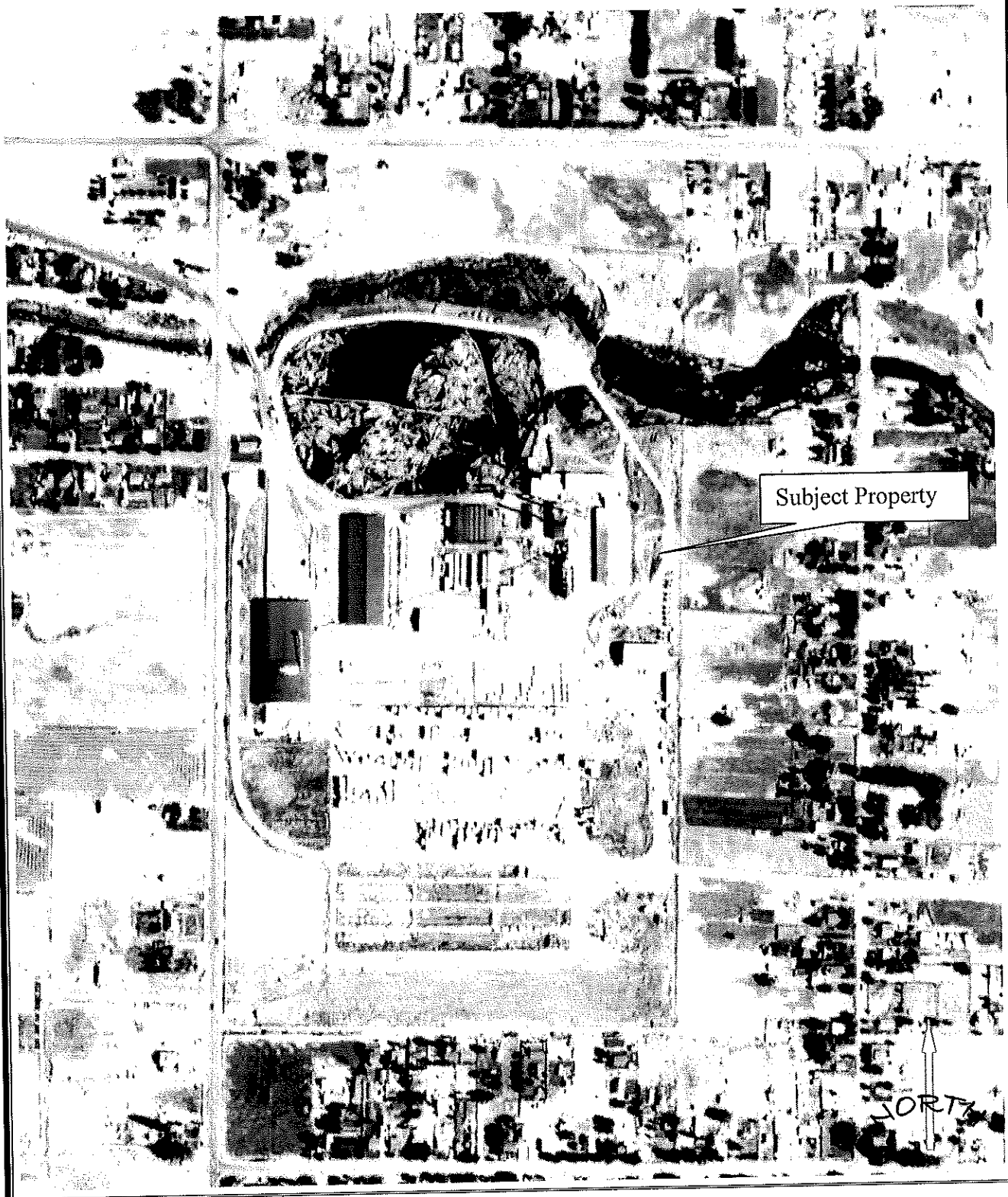
OSPREY Environmental, LLC

Project No.:	Scale:	Date:	Figure:
O002-1	**Not to Scale**	**April 2005**	**E 1**

1951 Aerial Photograph – Ochoco Lumber
200 SE Combs Flat Road
Prineville, OR 97754

OSPREY Environmental, LLC

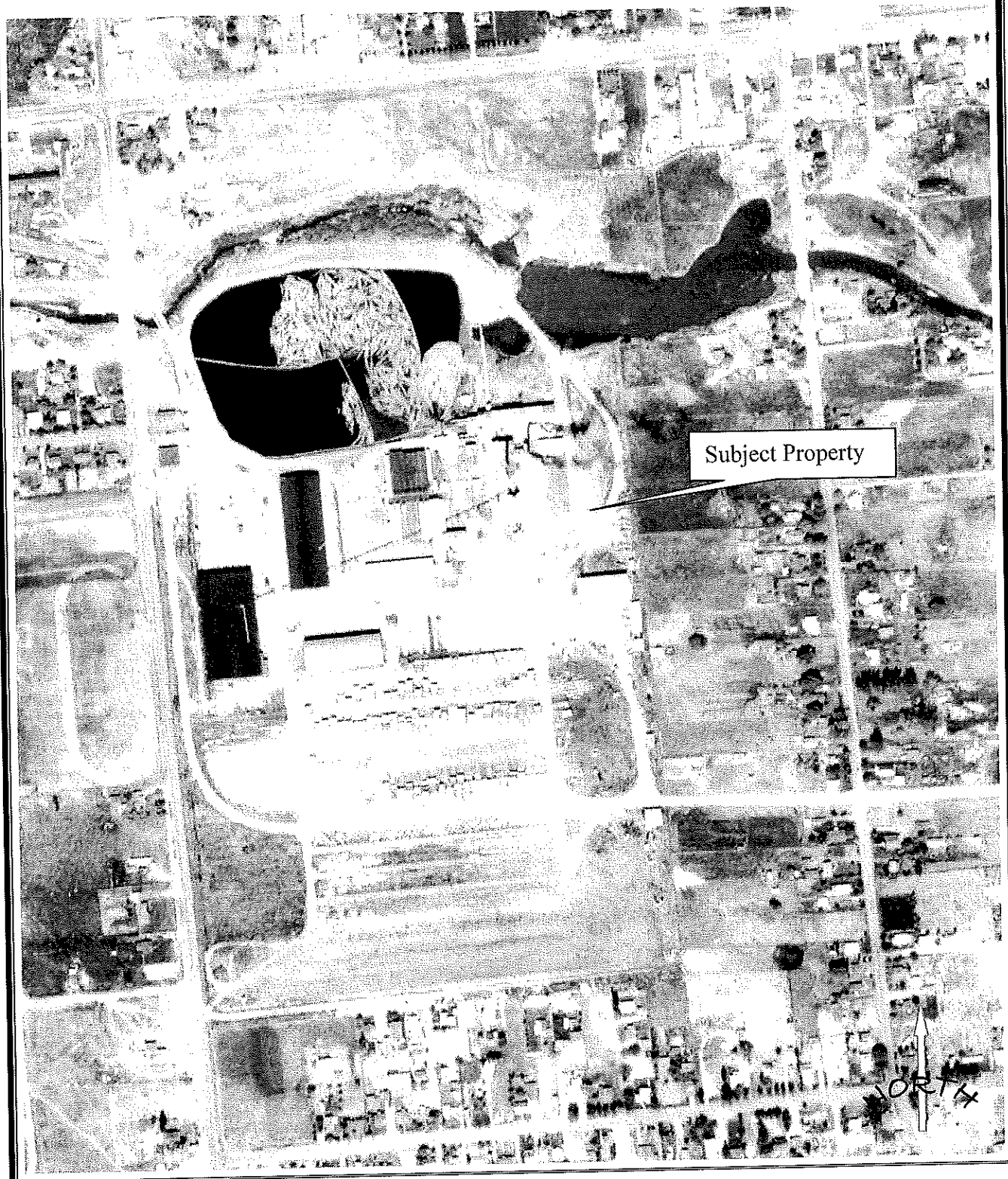
Project No.:	Scale:	Date:	Figure:
O002-1	**Not to Scale**	**April 2005**	**E 2**



1960 Aerial Photograph – Ochoco Lumber
200 SE Combs Flat Road
Prineville, OR 97754

OSPREY Environmental, LLC

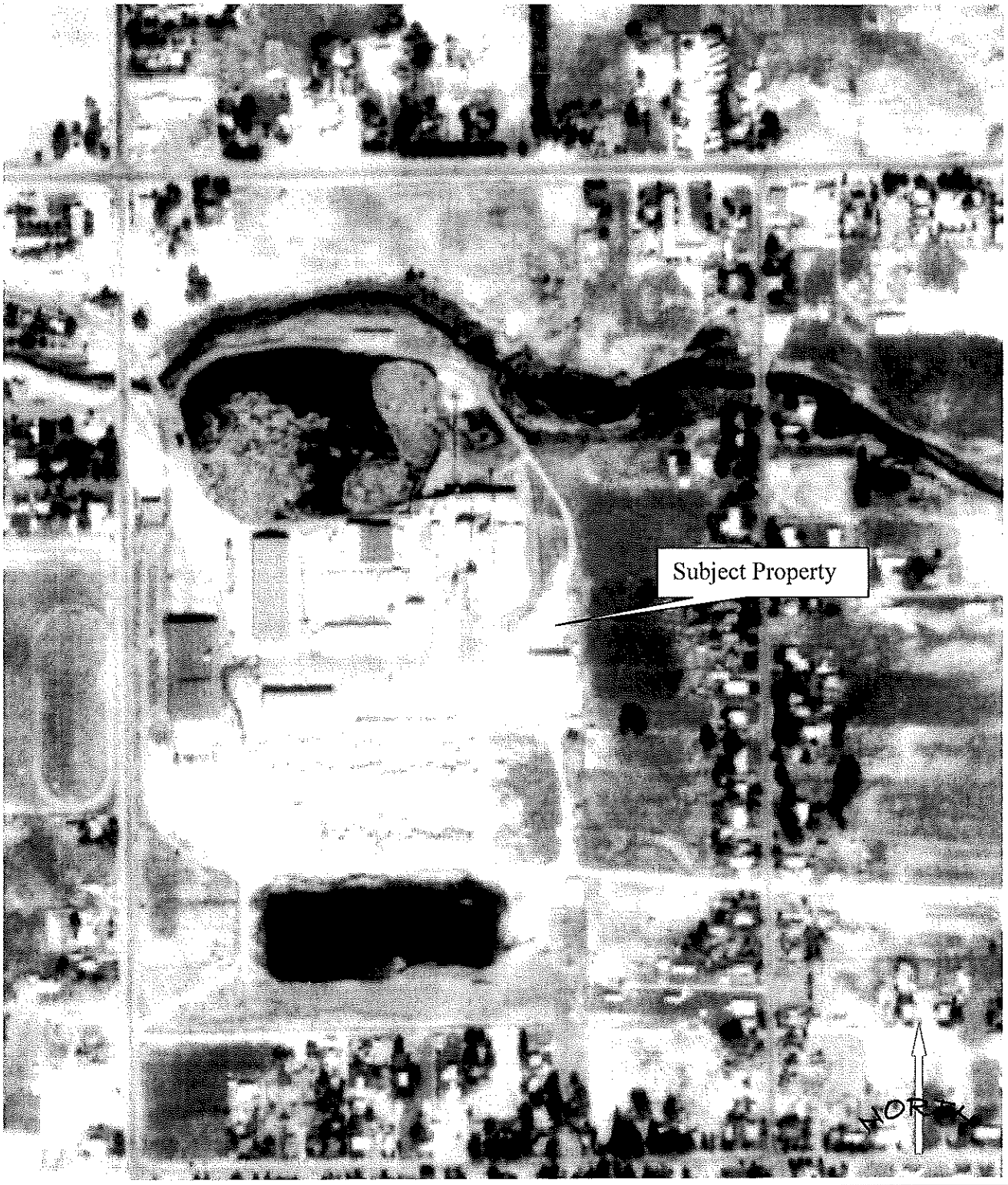
Project No.:	Scale:	Date:	Figure:
O002-1	**Not to Scale**	**April 2005**	**E 3**



1965 Aerial Photograph – Ochoco Lumber
200 SE Combs Flat Road
Prineville, OR 97754

OSPREY Environmental, LLC

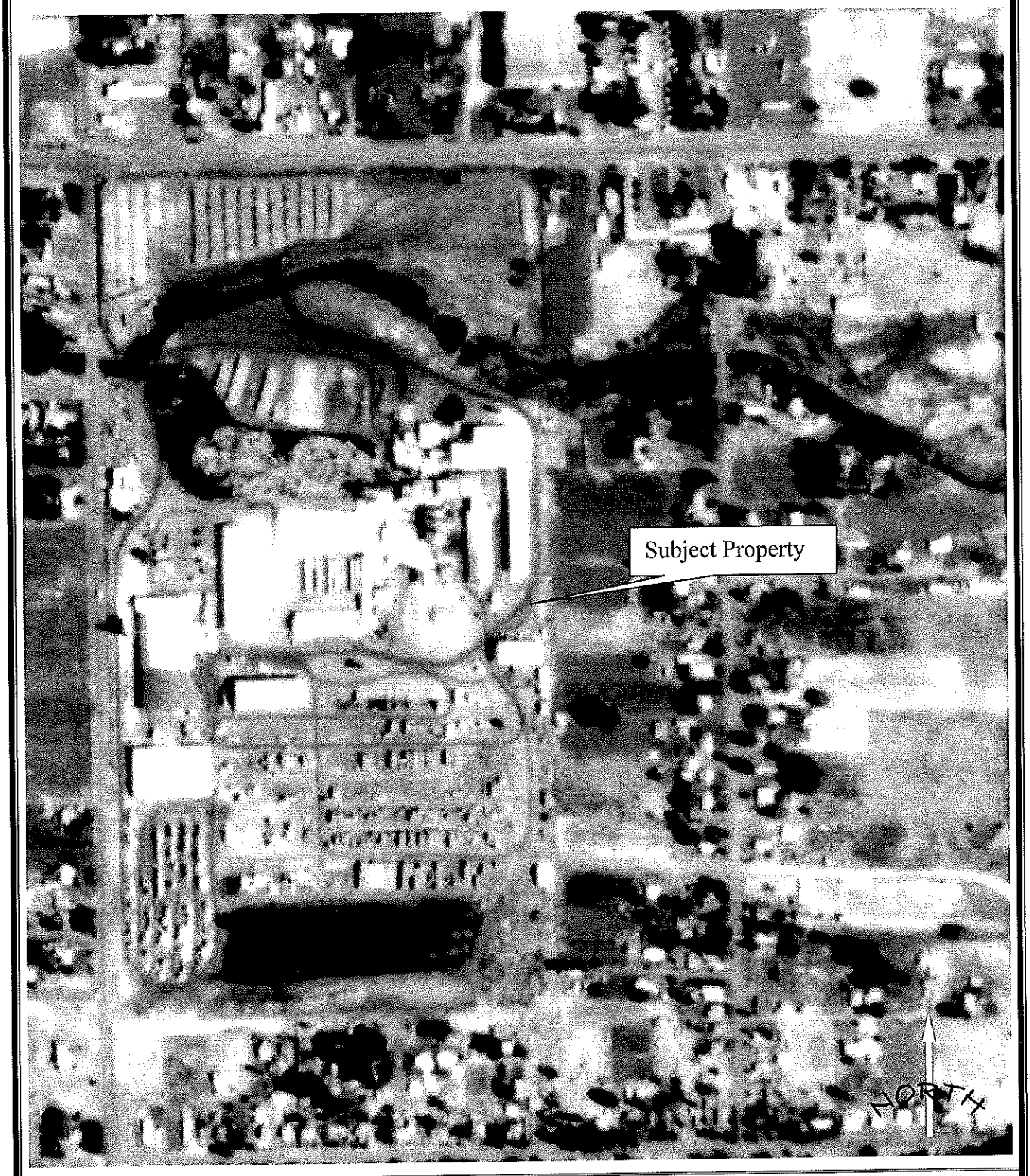
Project No.:	Scale:	Date:	Figure:
O002-1	**Not to Scale**	**April 2005**	**E 4**



1974 Aerial Photograph - Ochoco Lumber
200 SE Combs Flat Road
Prineville, OR 97754

OSPREY Environmental, LLC

Project No.:	Scale:	Date:	Figure:
O002-1	**Not to Scale**	**April 2005**	**E 5**



OSPREY
Environmental, LLC

1994 Aerial Photograph - Ochoco Lumber
200 SE Combs Flat Road
Prineville, OR 97754

Project No.:	Scale:	Date:	Figure:
O002-1	**Not to Scale**	**April 2005**	**E 6**

Appendix F

Site Photographs

View of former log pond filled with rubble from the northwest.

Detailed view of concrete rubble used as log pond fill materials.

View of fill materials along Ochoco Creek.

Detailed view of heavily stained concrete at former Small Log Mill debarker.

View of heavily stained foundations and soil at the former Green Chain.

View of former log intake area of the Large Log Mill at the former Log Pond.

View of heavily stained foundations and soil at the former Powerhouse.

View of impacted soil and water present in the former Bull Chain Motor Shed.

View of stained soil and mechanics trenches at former Truck Shop.

View of concrete containment basin at the former Truck Shop.

View of stained soil suspected to be associated with product overfilling at the AST concrete containment basin.

View of stormwater drain covered with duct tape at the AST containment basin.

View of stained concrete and soil associated with the former Planner Building.

View of heavily stained foundations and soil associated with the main Planner Drive Gear in the former Planner Building.

Appendix G

User Provided Information

HAZARDOUS WASTE
COMPLIANCE EVALUATION INSPECTION
OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

Facility Name:	Ochoco Lumber Company- Prineville
EPA Identification #:	NON-NOTIFIER
Mailing Address:	P.O. Box 668 Prinevile, Oregon 97754
Facility Contact:	Steve Lyon, Human Resource Manager
Telephone #:	(541) 447-6296
Date of Inspection:	July 29, 1997
Sampling Inspection:	July 30, 1997
Follow up Inspection:	September 16, 1997 jr 9/19/97
Inspector's Name/Title:	Lead: Jeff Ingalls, Env. Specialist John MacKellar, Environmental Spec. Frank Messina, Environmental Spec. AQ Department of Environmental Quality 2146 N.E. Fourth Street Bend, Oregon 97701

FACILITY BACKGROUND AND COMPLIANCE HISTORY:

Ochoco Lumber Company located in Prineville is a sawmill. The facility has been in business since 1938, simply stated they buy logs and sell lumber. The inspection was conducted as a Compliance Evaluation Inspection (CEI) that was scheduled because of a complaint received by the agency regarding wastewater management and used oil management practices at this facility. The complaint was received on or about July 9, 1997.

The facility had not notified of any hazardous waste or used oil activity. Ochoco Lumber has an existing NPDES permit that is currently being considered for renewal. The facility also has two registered underground fuel storage tanks. This facility had never been inspected for compliance with the hazardous waste or used oil requirements.

INTRODUCTION:

On July 29, 1997, John MacKellar and I arrived at Ochoco Lumber Company's, Prineville facility. We arrived at approximately 9:30 am. We introduced ourselves to the receptionist who, with some

uncertainty, introduced us to Mr. Steve Lyon, Human Resource Manager. I explained the reason for our site visit. Mr. Lyon explained that he did not know what hazardous waste management was and explained that he had never heard of a hazardous waste inspection.

Upon exchanging introductions, I asked Mr. Lyon if he considered himself the emergency coordinator. He explained he did not know what an emergency coordinator was and had no knowledge of the hazardous waste generator requirements. I then explained a bit about the hazardous waste program to Mr. Lyon. He said based on my explanation that he would probably be considered the emergency coordinator. He added later in the inspection that it was a full time job doing the Human Resource responsibilities for the two mills owned by Ochoco Lumber the second mill Malhuer Lumber is located in John Day.

I asked the basic questions concerning the facility and discovered that Ochoco Lumber Company in Prineville employs 130, the office is connected to City water and sewer while the mill yard has out-house facilities. There is no septic system at Ochoco. Mr. Lyons explained that he is the Human Resource Manager for both mill. He has been responsible for Prineville for about 6 months. He divides his time as necessary between the Prineville and John Day mills. I did add at this time that the knowledge he gains from this inspection should be taken back to John Day and applied at that mill.

With this introduction and the general lack of knowledge of Mr. Lyon I explained that I would like to conduct the facility inspection right away and attempt to get a handle on Ochoco Lumber's generator activities.

I did mention that the inspection was scheduled partly in response to a complaint. Mr. Lyon wanted very much to know the source of the complaint. I explained that the information was confidential and I would not release the name or names. To appease him I did say that he could contact my supervisor, Brett McKnight. However, I explained he would most likely get the same answer from Mr. McKnight, as he did from me.

Mr. Lyon also took this opportunity to vent a little concerning DEQ operations. He had nothing nice to say about our Underground Storage Tank Program and Mr. Eric Clough out of our Pendelton Office. After listening to Mr. Lyon I explained that I would take his concerns to my manager and I assured Mr. Lyon that we would look into the situation. I gave Mr. Lyon Mr. Clough's supervisor Jerry Preston's phone number. I then asked that we carry on with the business at hand.

With this we began the facility tour.

FACILITY TOUR:

The first area we asked to inspect was the truck shop. On the way to the truck shop I saw a single drum (reference photograph 1 Appendix A) sitting next to a small shed. The drum was covered with a piece of plywood and was determined to contain approximately 5 gallons of used oil. The drum was not labeled in any manner. State and federal regulations set forth in **OAR 340-111-032 and 40 CFR 279.22(c);** require generators of used oil to label containers with the words "used oil." Ochoco Lumber failed to label a container of used oil in the yard next to a small shed between the office and the truck shop with the words "used oil."

We next inspected the truck shop. Outside the shop there were several containers of used oil (reference photograph 2 Appendix A). The containers were not labelled in any manner, were not covered, and some had released all or a portion of there contents onto the ground (reference photograph 3 Appendix A). It was estimated that there was approximately 150 gallons of used oil stored outside the truck shop. Many of the five gallon containers were open and filled to the top so that any rainwater would create a spill or release to the ground. The ground was saturated with oil in this area. There were also drums and five gallon containers in areas around the truck shop. These containers of used oil were also not labeled, did not have covers, and were leaking some of their contents on the ground (reference photograph 4 Appendix A). State and federal regulations set forth in **OAR 340-111-032 and 40 CFR 279.22(c) and (d);** require generators of used oil to label containers with the words "used oil," and to clean up any releases of used oil. State regulations set forth in **OAR 340-111-032(2),** require containers, used to store used oil, to be closed, covered, or located under cover to prevent rainwater from coming in contact with the used oil. Ochoco Lumber Company failed to label the containers with the words "used oil," failed to clean up visible releases of used oil, and failed to keep most of the containers covered so that rainwater could not get into the containers. The containers were located in and around the truck shop.

I returned to the Ochoco Lumber the following day to take samples of transformers, drums, and suspected asbestos material found in the boneyard. I also looked at the used oil storage area described above. Overnight it rained over an inch and the containers of used oil were still outside, uncovered, and not labelled. This was something I expected Ochoco Lumber to address right away. My next follow up visit September 16, 1997 was conducted to determine if Ochoco Lumber had responded to the August 6, 1997 letter that I had sent out just before my vacation. With regard to the used oil storage area outside the truck shop nothing had been done (reference photographs 2A & 3A Appendix A). I explained to Mr. Lyon that I was disappointed that not even something as simple as covering and labelling used oil containers had been done over the

7 week period since my initial inspection. I then explained that all this is doing is making clean up of the release of oil in and around the truck shop that much more difficult. Mr. Lyon agreed.

I also observed on my follow up visit on September 16, 1997 that the drums in and around the truck shop had not been moved to a central location as I suggested during the inspection (reference photographs 4A-4C Appendix A).

I spoke with Ben Owens, truck shop lead mechanic. Mr. Owens explained that he had been with Ochoco for 20 years. I asked Mr. Owens what he did with his used oil. He explained that they dumped the used oil on the hog fuel pile and burned the oil soaked hog fuel in their boiler. I asked if they had analyzed the oil for on- and off-specification or for hazardous waste characteristics. Mr. Owen explained, and Mr. Lyon reiterated, that they had not sampled the oil.

Mr. Lyon seemed surprised at the management practices for the used oil and said that he was not aware that this was happening with the used oil: Used oil that is used in this manner must be on-specification used oil. In the absence of any analysis Ochoco Lumber did not make a hazardous waste determination on their used oil and failed to determine if the oil was specification used oil prior to dumping the oil on their hog fuel and burning it in their hog fuel boiler. State and federal regulations pursuant to **OAR 340-102-011 and 40 CFR 262.11** require generators of solid wastes to determine if their solid wastes are hazardous wastes. Ochoco Lumber failed to make a hazardous waste determination on their used oil, prior to it being burned in their hog fuel boiler.

I next asked Mr. Owen about solvent use. He said they had a single solvent tank that was managed by Safety-Kleen. The records which were organized by throwing them in a box indicated that Safety-Kleen serviced this unit every 2 months. The bill of lading indicated that 15 gallons of waste were generated each time they serviced this tank. A copy of the Safety Kleen bill of lading is included in Appendix D of this report.

I then asked Mr. Owen what they did with their antifreeze. He explained that they dump the antifreeze in with the used oil and the antifreeze also gets dumped on the hog fuel and burned in the boiler. State and federal regulations pursuant to **OAR 340-102-011 and 40 CFR 262.11** require generators of solid wastes to determine if their solid wastes are hazardous wastes. Ochoco Lumber failed to make a hazardous waste determination on their spent antifreeze, prior to mixing it with their used oil and burning the mixture in their hog fuel boiler.

The next area I inspected was the boneyard. I observed three batteries abandoned on the ground (reference photograph 5 Appendix A). I explained to Mr. Lyon that batteries that are abandoned in

this manner may not be exempt from the hazardous waste regulations, as this management practice is more waste management than recycling. I recommended, if possible, that he place the batteries undercover on a pallet in the truckshop.

The batteries were sitting outside an abandoned building that Mr. Lyon explained was the old truck shop. Next to the batteries I noticed a stand pipe (reference photograph 5 Appendix A). I explained to Mr. Lyon that this appeared to be an underground storage tank and asked if he knew anything about the vent pipe or a underground tank in this area. He explained that he did not know. We attempted without success to take the cap off the stand pipe and determine if the tank was full or empty. This being the case I told Mr. Lyon that he would need to determine if the stand pipe does indeed vent an underground storage tank, and if so he would need to let me know how big the tank is, and what the contents of the tank was and when the tank was last used.

I drafted a letter to Mr. Lyons on August 6, 1997 outlining items that needed attention. A copy of that letter is included in Appendix B of this report. Having not heard from Mr. Lyons, I visited the site on September 16, 1997 to see if he had made any progress on determining what the stand pipe was about and to check out other items of concern. Mr. Lyon explained that they had done nothing and he would let me know later on in the week what they find out.

At the time of the inspection I asked Mr. Lyon if the tank was registered. He explained that he did not think so. I explained that their two fuel tanks were the only tanks that we had in our files as registered tanks. On September 23, 1997 facility representatives informed me that there was indeed a tank there and to the best of their knowledge it contained water. This being the case Ochoco Lumber will have to do sampleing to determine if the tank had leaked and what if anything was in the tank and when was the tank last used.

Also next to the old truck shop was a small grease container (reference photograph 6 Appendix A). The container was about half full of an unknown liquid. Mr. Lyon agreed that it did not contain grease and said he would determine what was in the container. State and federal regulations pursuant to **OAR 340-102-011 and 40 CFR 262.11** require generators of solid wastes to determine if their solid wastes are hazardous wastes. Ochoco Lumber failed to make a hazardous waste determination on the contents of a grease gun located in their boneyard near the old truck shop. As of my visit on September 16, 1997 nothing had been done to determine the content of this container.

In the center of the boneyard there were several 55 gallon drums of unknown liquid (reference photograph 7 and 8 Appendix A). After opening the drums it appeared that they contained used oil or

perhaps clean oil. Mr. Lyon said that even if the oil was clean oil they would not use it in their equipment now that it had been sitting out in the boneyard for so long. The drums were not labeled in any manner, and visible releases were evident around this area. State and federal regulations set forth in **OAR 340-111-032 and 40 CFR 279.22(c) and (d);** require generators of used oil to label containers with the words "used oil," and to clean up any releases of used oil. Ochoco Lumber Company failed to label five 55 gallon containers stored in the center of the boneyard with the words "used oil," and failed to clean up visible releases of used oil around the containers of what appeared to be used oil drums. As of my visit on September 16, 1997 no determination had been made on this material

I next observed 3 cardboard/paper drums stored at the north end of the boneyard (reference photograph 9 Appendix A). Mr. Lyon could not for sure say what was in the drums but he did feel that the material had something to do with boiler maintenance. It was later determined that the drums contained alum. A chemical that at one time was used in boiler maintenance. It was determined that this material could be disposed of at the Crook County Landfill.

Just west of the alum containers I noticed 4 transformers (reference photograph 10 Appendix A). The transformers were not labelled in any manner and visible releases were evident around all four transformers (reference photograph 11 Appendix A). The State is not authorized for the PCB portion of EPA Toxic Substance Control Act (TSCA). However, I did inform Mr. Lyon that transformers that have not been tested or are not labelled must be assumed to be PCB transformers and must be stored in containment and covered. Following the inspection I contacted Mr. Dan Hyster, Oregon's EPA Operations Office, and explained what I had found. I explained that if the transformers were determined to contain PCBs that I would be referring this case to EPA.

Because Mr. Lyon knew nothing about the transformers and because they all had been leaking onto the ground I informed Mr. Lyon that we would be returning the following day to sample the soils under the transformers. On July 30, 1997 we sampled the soils in and around three of the four transformers (reference photographs 12-15). Sample results indicated that the soil contained no PCBs. The complete laboratory report is included in Appendix C of this report.

Within a week I had preliminary results from the lab and informed Mr. Lyon that the releases from the transformers were determined to be non-detect for PCBs. I explained that this did not relieve him of his obligation to sample the transformers to determine if they were PCB transformers. Following the inspection Mr. Lyon discovered that indeed three of the transformers had been sampled and did not contain PCBs. I explained on my September 16, 1997 follow up visit, after reviewing the information, that Mr. Lyon

would now only need to verify the serial numbers and then determine which transformers had been sampled and which had not been sampled. He would then need to sample the transformer or transformers that had not yet been sampled. I further explained that he should ship the transformers off-site once he has made his determination.

I next noticed a couple of drums south of the transformers in the center of the boneyard (reference photographs 16 & 17 Appendix A). Mr. Lyon could not tell me what the drums contained. State and federal regulations pursuant to **OAR 340-102-011 and 40 CFR 262.11** require generators of solid wastes to determine if their solid wastes are hazardous wastes. Ochoco Lumber failed to make a hazardous waste determination on the contents of two 55 gallon drums in the boneyard.

The one drum of unknown waste shown in photograph 17 was open and smelled and appeared to be gasoline contaminated wood chips. I explained to Mr. Lyon that I would be sampling the contents of this drum the following day. On July 30, 1997 I returned to Ochoco Lumber and sampled the contents of the container (reference photographs 18-20 Appendix A). The contents of the drum had been impacted as the area received over an inch of rain overnight. The sample did not fail a characteristic of a hazardous waste. Complete sample results are included in Appendix C of this report.

I then walked through several large equipment pieces and to the back southeast corner of the boneyard. There I observed a large dilapidated wooden box (reference photograph 21 Appendix A). The box was full of large double lined plastic bags. Some of the bags on both the south and north ends of the box had been compromised and there were bricks that appeared to be asbestos (reference photograph 22 Appendix A). For safety reasons we did not handle this material. Mr. Lyon when asked said that he did not think they were asbestos and before the inspection was over several facility representatives looked at the material and concluded it could not be asbestos.

I explained to Mr. Lyon that I would be returning the next day to do some sampling of this material to determine if it was asbestos. We returned the next day, July 30, 1997 for sampling (reference photographs 23-28 Appendix A). Sample results indicated that the material was indeed 10% friable asbestos. This portion of the case was turned over to Mr. Frank Messina, Air Quality Enforcement, DEQ, in the Bend Office. A notice of noncompliance and a formal enforcement action have been issued. A copy of the notice is and notice of assessment of civil penalty is included in Appendix E of this report.

The next area I inspected was the boiler. The complaint alleged that chemicals were being used in boiler operations and are discharged to the facility's NPDES permitted log floating pond (a diversion from the Ochoco Creek). Records showed that Ochoco

Lumber was doing all analysis necessary to comply with their NPDES permit and they were also taking temperatures which the permit did not require. Temperature information showed that the outfall from the log pond was 2 degrees greater than the inlet to the log pond. I looked at the chemicals used and they were chemicals commonly used to maintain boiler operations. The NPDES permit specifically allows the discharge of industrial wastewaters to the pond at set values and there was no evidence to lead me to believe that Ochoco was exceeding these parameters. I did pH the outfalls (reference photographs 29 & 30 Appendix A). Field pH indicator strips showed that the pH was neutral 7.

The next area I inspected was the debarker next to the small logmill. Under the debarker I noticed that there was a small oil leak. The hydraulic fluid was actively leaking onto the ground (reference photograph 31 Appendix A). Division 108 spill response regulations require that spills or releases of petroleum products must be cleaned up immediately. State regulation set forth in **OAR 340-108-030(1)** require facilities that spill or release oil or hazardous material to the surface of the land to immediately cleanup the spill or release consistent with sections OAR 340-108-130(2)&(3). Ochoco Lumber failed to make an effort to stop an ongoing equipment leak at the debarker and clean up the release.

I next inspected the small logmill. Behind the small logmill I observed several drums (reference photograph 32 Appendix A). The drums were all empty drums except for one of the drums. That drum contained what Mr. Lyon and the logmill maintenance foreman Kenny said was used oil. The drum was not labelled in any manner, was open as it had a hole in the top of the drum, and visible releases were observed around the container (reference photograph 33 Appendix A). State and federal regulations set forth in **OAR 340-111-032 and 40 CFR 279.22(c) and (d);** require generators of used oil to label containers with the words "used oil," and to clean up any releases of used oil. State regulations set forth in **OAR 340-111-032(2)**, require containers, used to store used oil, to be closed, covered, or located under cover to prevent rainwater from coming in contact with the used oil. Ochoco Lumber Company failed to label a 55 gallon drum of used oil located behind the small logmill with the words "used oil," failed to clean up visible releases of used oil from that drum, and failed to keep the container covered so that rain water could not get into the container.

Just inside the small logmill there is an area used for product storage (reference photograph 34 Appendix A). Drip pans are used to catch any of the product drippage and the drippage is collected and placed in the drum outside the building. The small logmill shop was also the home of Ochoco Lumber's second degreasing station. There was massive confusion as to who manages this unit. At first Mr. Lyon said Safety-Kleen managed the unit; however, we could find no paperwork to verify that claim. Following the

inspection I contacted Safety-Kleen and they said they only serviced the unit in the truck shop. During my sampling visit the next day, July 30, 1997, I explained that I had contacted Safety-Kleen and they said they did not service that unit. Mr. Lyon and Kenny then said that NAPA Auto managed that waste. I stopped by the NAPA Auto store in Prineville and spoke with NAPA on July 30, 1997. They said that they did not take solvent from anyone. As it turns out the final story from Ochoco Lumber, as stated during my follow up visit on September 16, 1997 was that they never have cleaned out the solvent tank. They added that since the inspection they have requested that Safety-Kleen service this unit.

I looked at the blade cleaning and sharpening room in both the large and small logmills (reference photograph 35 Appendix A). No caustic cleaners are used to clean the blades. Diesel is sometimes used; consequently, no hazardous waste are generated in the blade rooms at the logmills.

The last area that we inspected was the planer room. Hydraulic oil was the only waste generated at the planer. Lee, supervisor of the planer room, explained that the oil is collected in a blind sump that is pumped out 3 or 4 times a year. Each cleaning generates about 60 gallons of oil. The oil here is also blended with the hog fuel and burned in the boiler.

Lee did say that he used a caustic cleaner "blade clean" to clean his saw blades. He said he mixed it up in gallon batches and never really generated any waste cleaner. This concluded the inspection at Ochoco Lumber.

SAMPLING INSPECTION:

On July 30, 1997 a sampling inspection was conducted at the Ochoco Lumber Company's - Prineville facility. The reason for the follow up sampling inspection was the potential for some of the solid wastes disposed of in the boneyard being regulated as TSCA or RCRA wastes.

We suited up in protective gear to take potential asbestos and PCB samples. We sampled the bricks in the large wooden box and found them to be 10% friable asbestos. The contaminated soil samples around transformers were found to be nondetect for PCBs. The sample from the drum containing gasoline soaked wood chips was also determined to be nondetect for benzene and other volatiles.

Complete sample results are included in Appendix C of this report.

CLOSING DISCUSSION:

Following the inspection on July 29, 1997 we returned to Mr. Lyon's office. There I explained what issues we had uncovered during the inspection and what steps needed to be taken to correct the conditions identified during the inspection. We also mentioned the items still unanswered like the solvent at the small logmill, the stand pipe outside the old truck shop, the wooden container of unknown blocks in the boneyard, and the transformers in the boneyard.

I explained that we would be coming back tomorrow to conduct a sampling inspection that would at least get resolution on the blocks in the wooden box and the transformers. I then summarized the problems that we saw during the inspection particularly pertaining to used oil management at the truck shop. I also discussed failure to make determinations on used oil, antifreeze and abandoned containers in the boneyard.

I then explained things that needed to be done and mechanisms available to accomplish what needed to be done. I suggested a used oil fired space heater for the excess used oil and explained the benefits of the space heater. I recommended that they consider a company such as High Desert Antifreeze for reclaiming their spent antifreeze. I then explained that there are several people in the area that will take used oil including the Prineville Railroad, Redmond Tallow, Central Waste Haulers and Spencer Environmental. I also said that Spencer would take their spent antifreeze for offsite recycling.

I discussed the simple rules that pertain to generators of used oil and explained that conditionally exempt generators can mix their spent stoddard solvent in with their used oil and the mixture is regulated as a used oil not a hazardous waste.

I then opened the floor to any questions Mr. Lyon might have had following the inspection. Mr. Lyon was concerned about where we go from here. He wanted to know if there would be any penalties. I explained that Air Quality might take a civil action against them if the blocks were determined to be greater than 1% asbestos. I explained if the transformers turned out to be PCB transformers that I would have to refer the case to the EPA office in Portland and added that the EPA imposed penalties for PCB violations can be very costly. I stated that some of the violations observed during this inspection were Class I violations and may be referred for civil penalty depending on the answers to some of the outstanding issues and depending on their cooperation.

This concluded the closing discussion.

CONCLUSION:

Ochoco Lumber Company is most likely a conditionally exempt

generator of hazardous waste. The determination of the material in the boneyard is still ongoing. The story concerning the solvent tank at the small logmill is a bit disconcerting in that the facility representatives admitted that the unit had been cleaned out at least twice in the last year; yet, the final story after saying Safety-Kleen does it, no NAPA does it, was no it never was cleaned.

The issues described above aside, I inspected the facility as a conditionally exempt generator and a generator of used oil. The facility was found to be out of compliance with the following used oil and hazardous waste management requirements:

SUMMARY of VIOLATIONS:

Hazardous Waste Regulations:

Violation 1 - Class 1; Failure to make hazardous waste determinations:

OAR 340-102-011 and 40 CFR 262.11 require generators of solid wastes to determine if their solid wastes are hazardous wastes. Ochoco Lumber failed to make a hazardous waste determination on the following wastestreams:

* Used oils generated at the truck shop, the planner room, and the large and small logmill;

* Antifreeze generated at the truck shop; and

* Drums and containers in stored in the boneyard.

Used Oil Regulations:

Violation 1 - Class 2

OAR 340-111-032 and 40 CFR 279.22(c) require generators of used oil to label containers with the words "used oil." Ochoco Lumber Company failed to label used oil containers with the words "used oil" at the following locations:

* outside the truck shop;
* a shed between the office and the truck shop;
* five 55 gallon drums stored in the center of the boneyard; and
* a 55 gallon drum behind the small log mill.

Violation 2 - Class 2

OAR 340-111-032 and 40 CFR 279.22(d); require generators of used oil to clean up any releases of used oil. Ochoco Lumber Company failed to clean up visible release of used oil at the

following locations:

* outside the truck shop
* five 55 gallon drums stored in the center of the boneyard; and
* a 55 gallon drum behind the small log mill.

Violation 3 - Class 2

OAR 340-111-032(2), require containers, used to store used oil, to be closed, covered, or located under cover to prevent rainwater from coming in contact with the used oil. Ochoco Lumber Company failed to keep containers of used oil covered at the following locations:

* outside the truck shop; and
* a 55 gallon drum behind the small log mill.

Divison 108 Spill Requirements:

Violation 1 - Class 1

OAR 340-108-030(1) require facilities that spill or release oil or hazardous material to the surface of the land to immediately cleanup the spill or release consistent with sections OAR 340-108-130(2)&(3). Ochoco Lumber failed to make an effort to stop an ongoing equipment leak at the debarker.

APPENDICES:

A Photographs and photolog
B August 6, 1997 letter to Mr. Lyons
C Sampling Analysis from Lab
D Safety-Kleen bill of lading
E Notice of Noncompliance from Air Quality
& Notice of assessment of civil penalty Air Quality

APPENDIX A

PHOTOGRAPHS AND PHOTOLOG

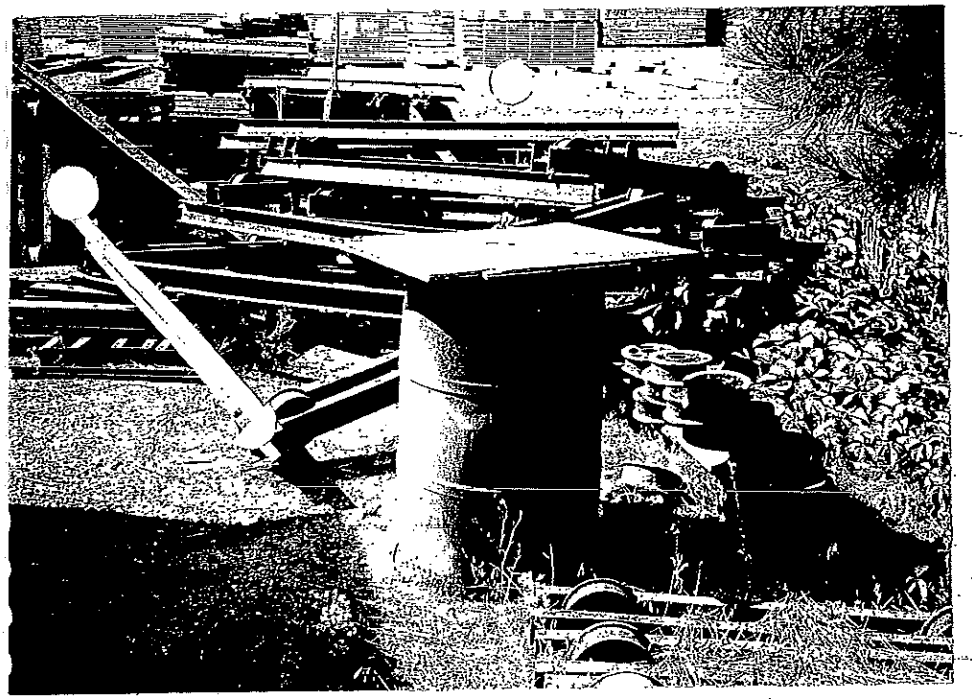


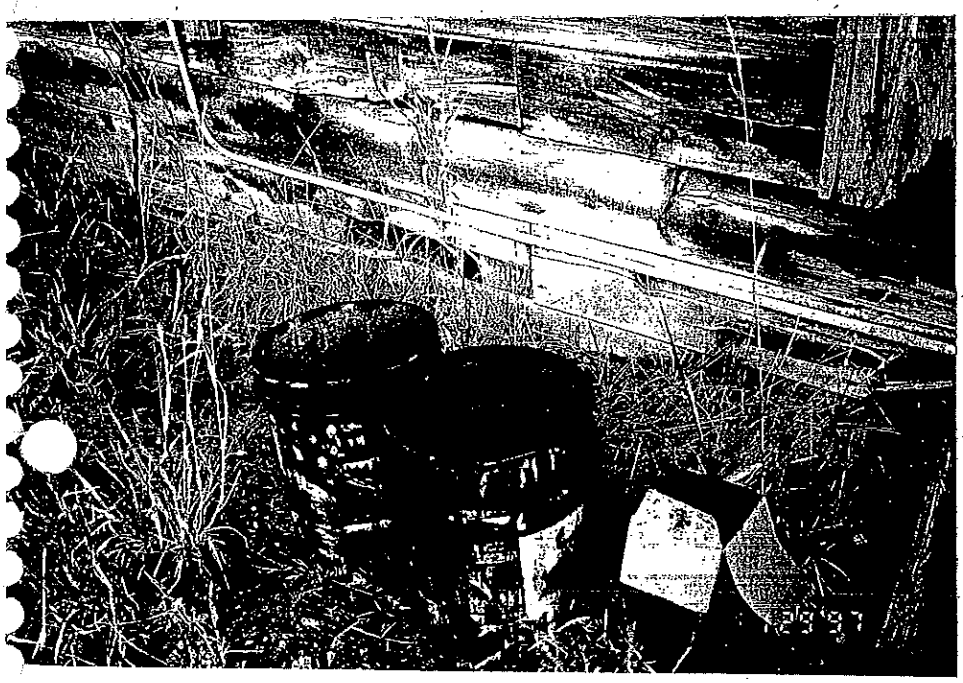
Photo #1

Photo #2

Photo #2A

Photo #3

Photo #3A



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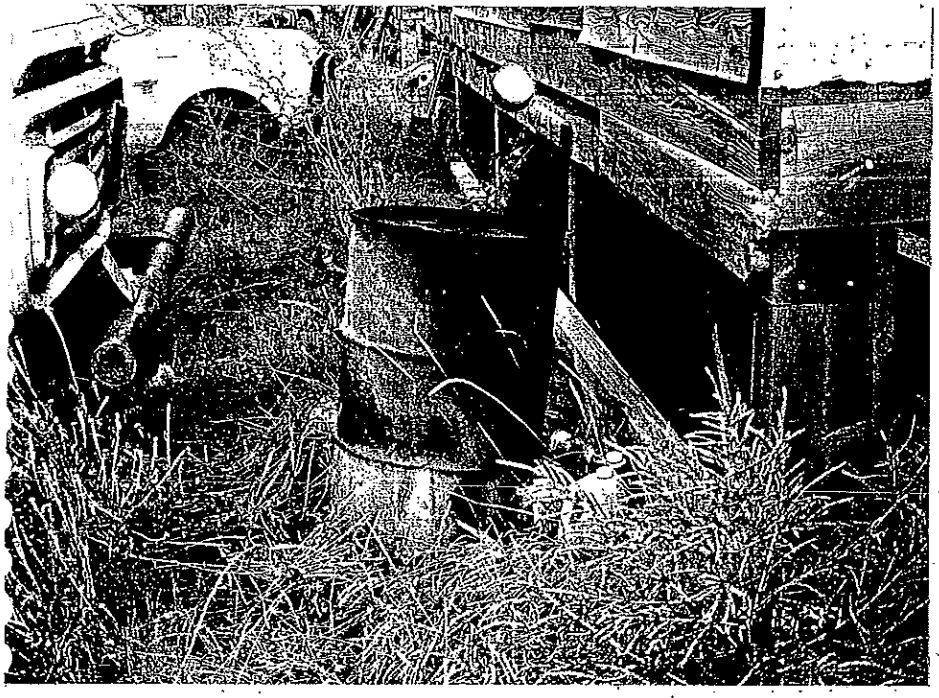

Photo #4A

Photo #4B

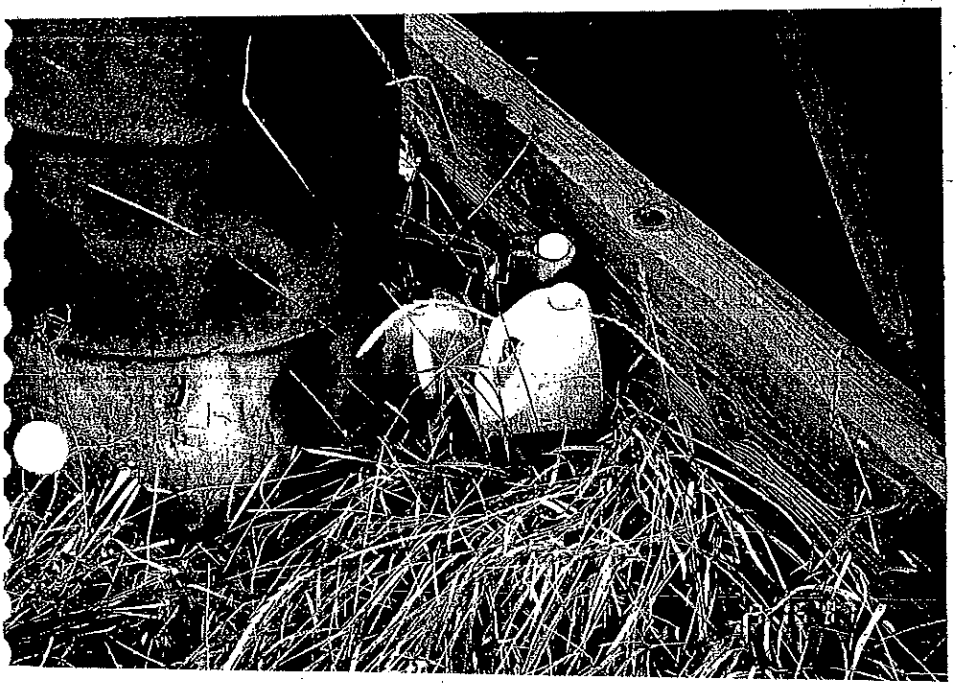

Photo #4C

Photo #5

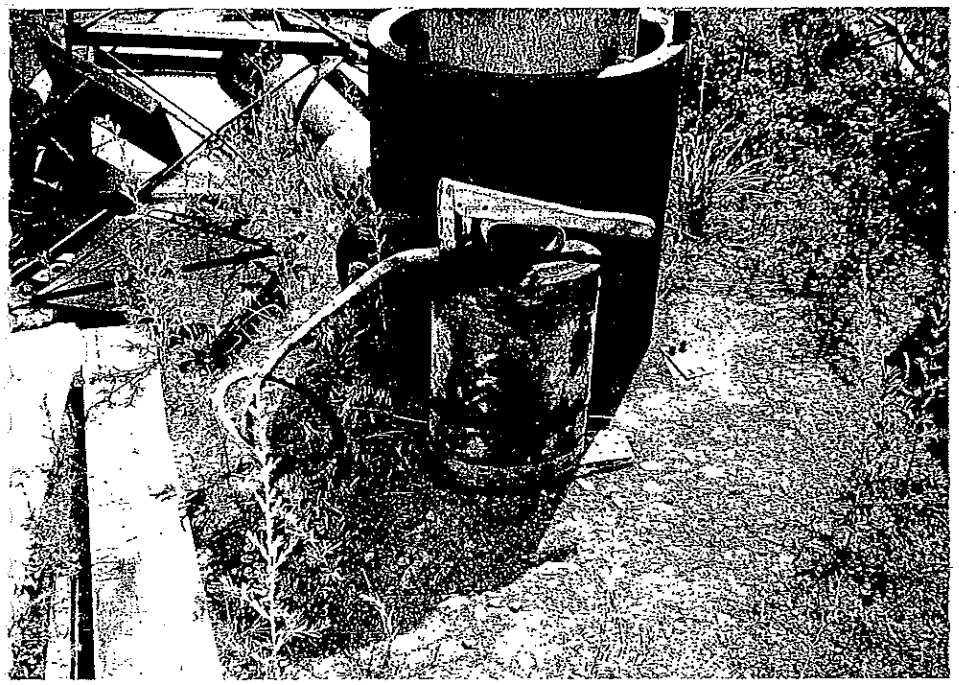

Photo #6

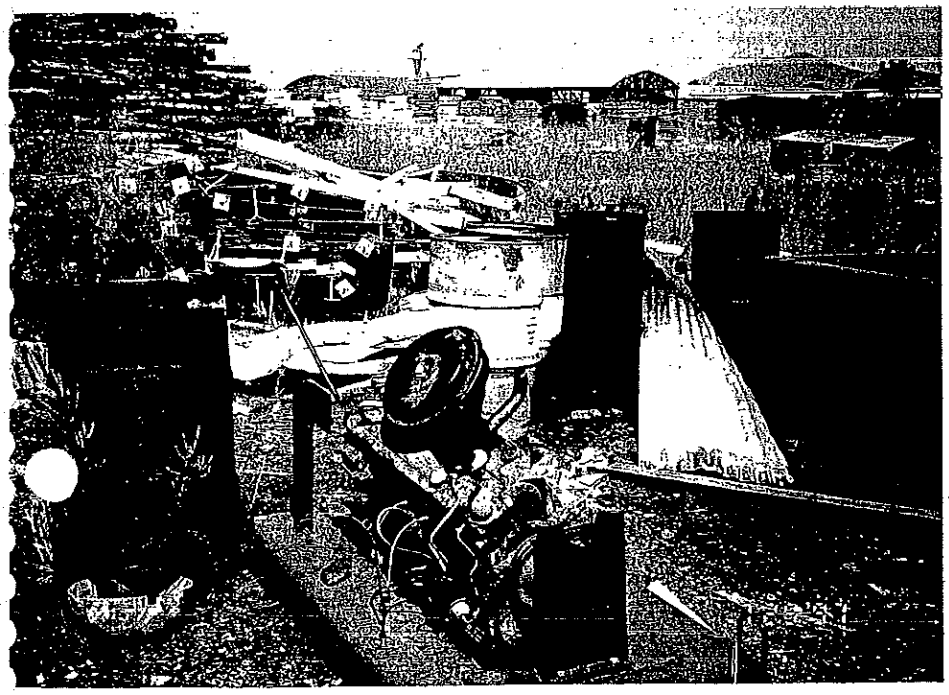

Photo #7

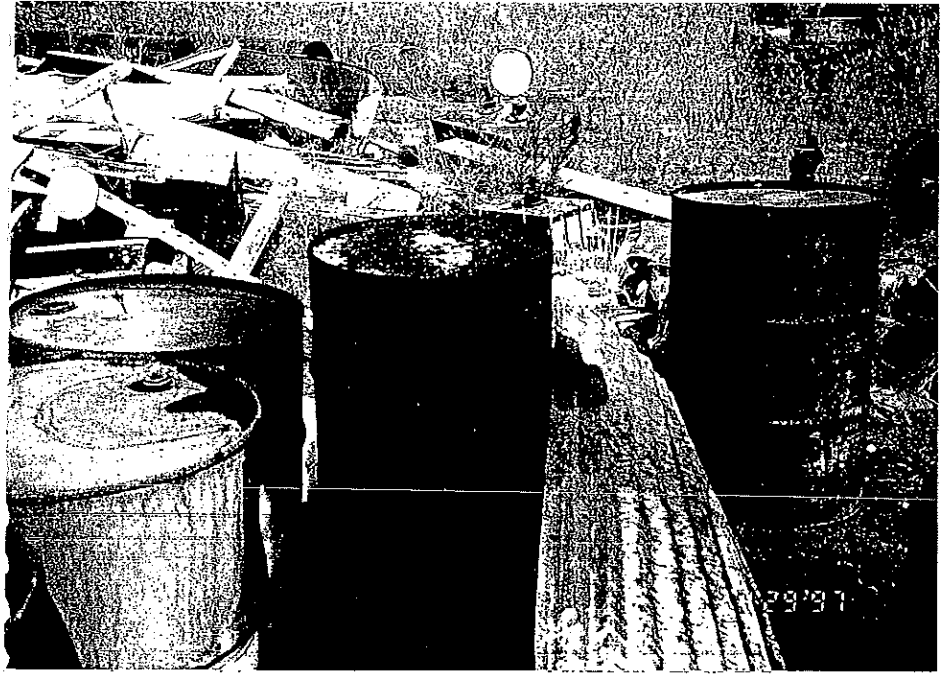

Photo #8

Photo #9

Photo #10

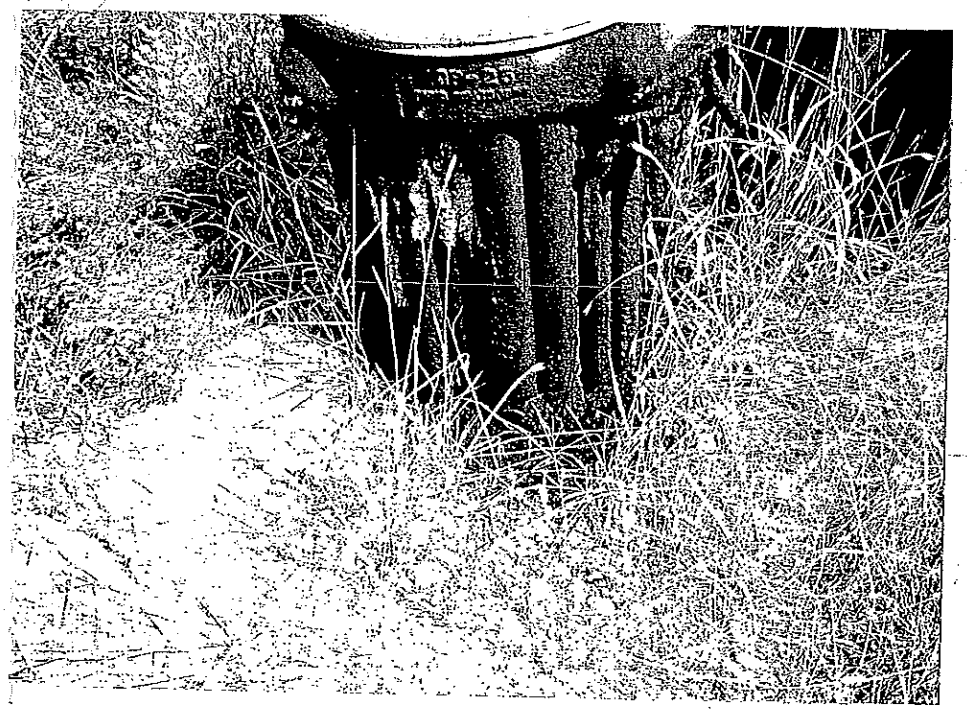

Photo #11

Photo #12

Photo #13

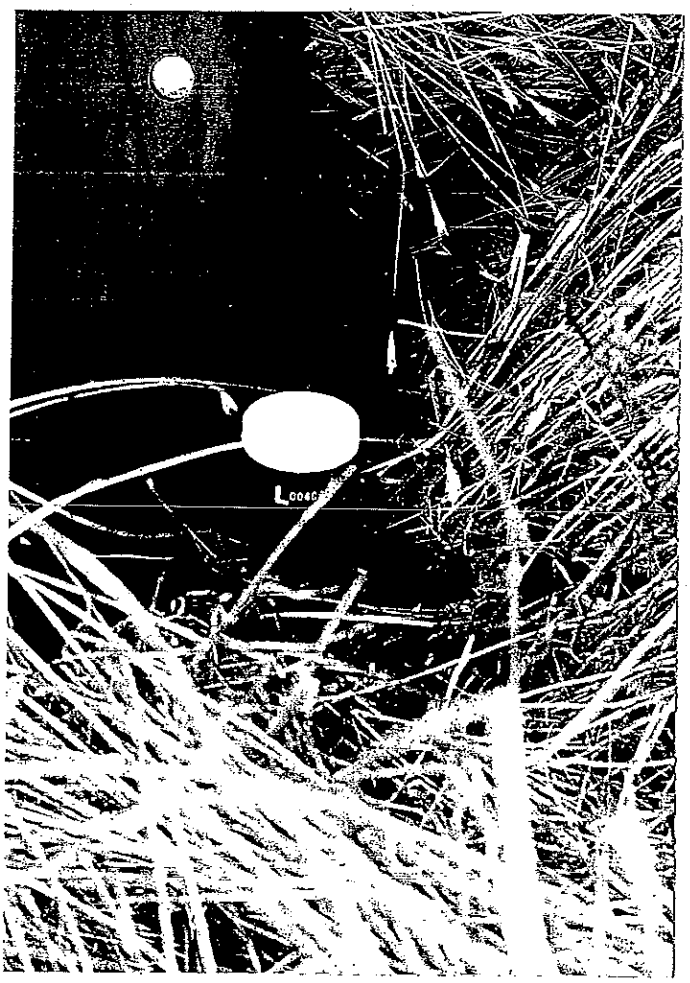

Photo #14

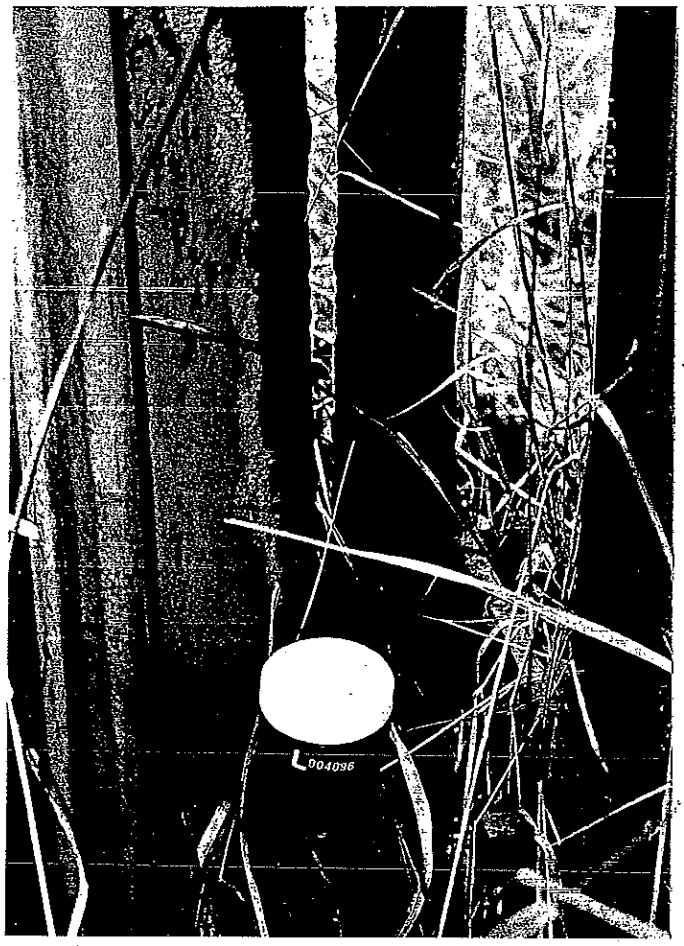

Photo #15

Photo #16

Photo #17

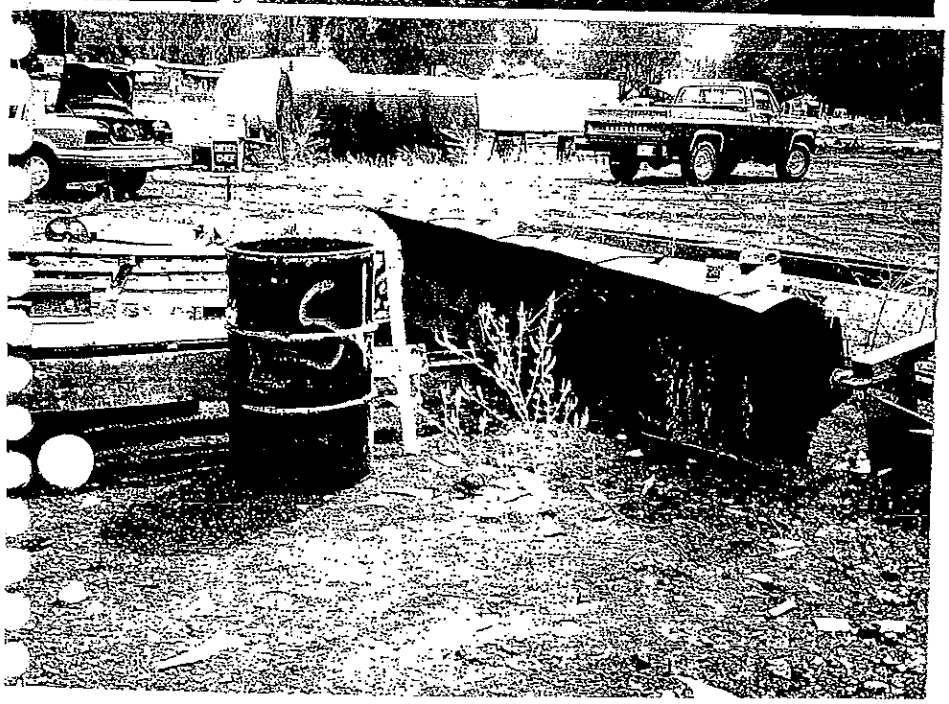

Photo #18

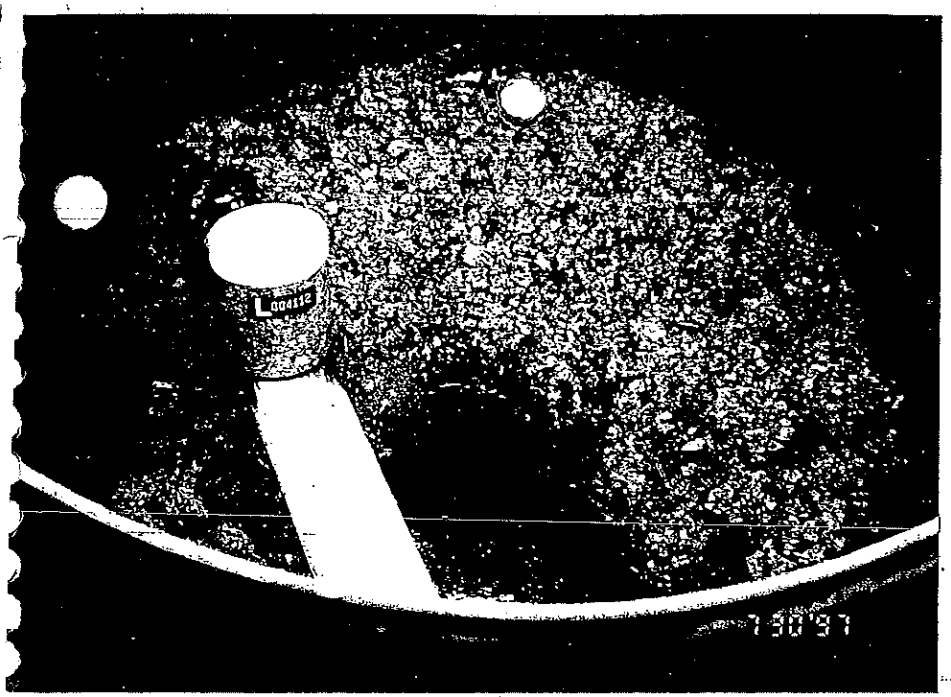

Photo #19

Photo #20

Photo #21

Photo #22

Photo #23

Photo #24

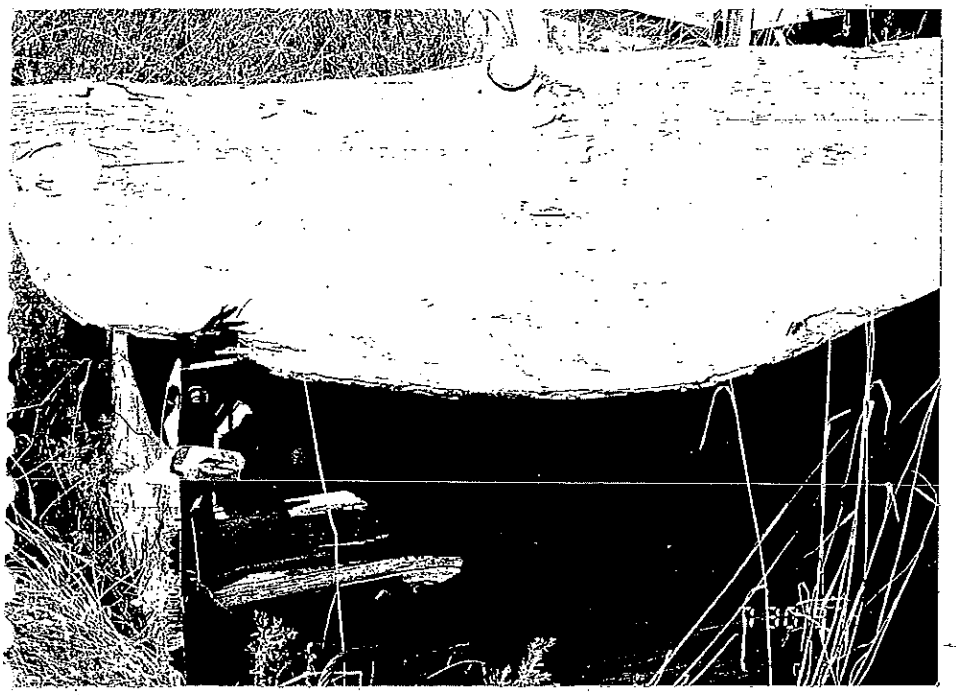

Photo #25

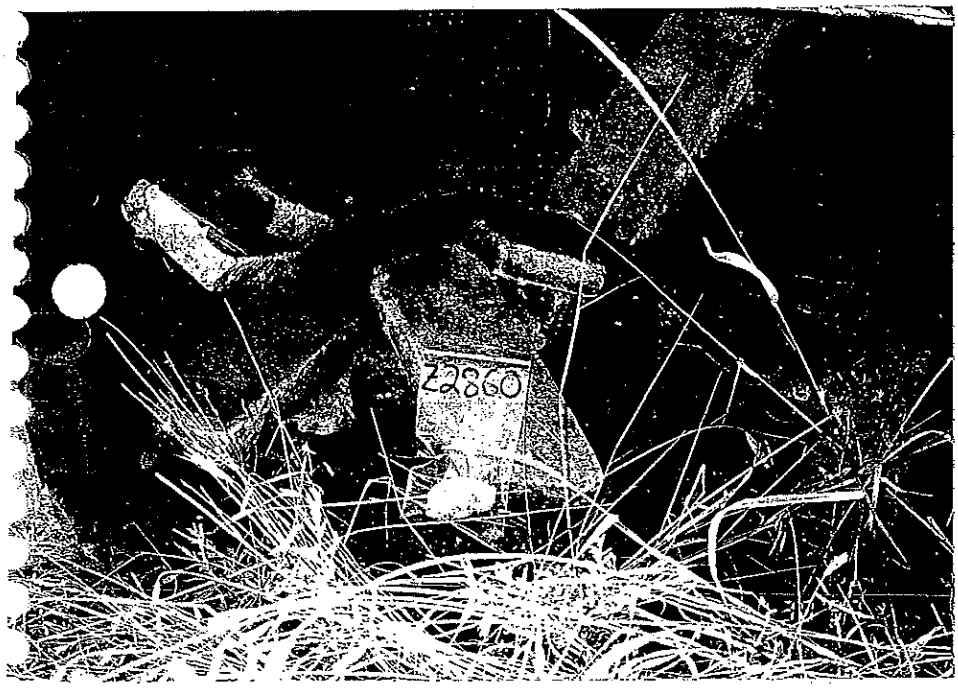

Photo #26

Photo #27

Photo #28

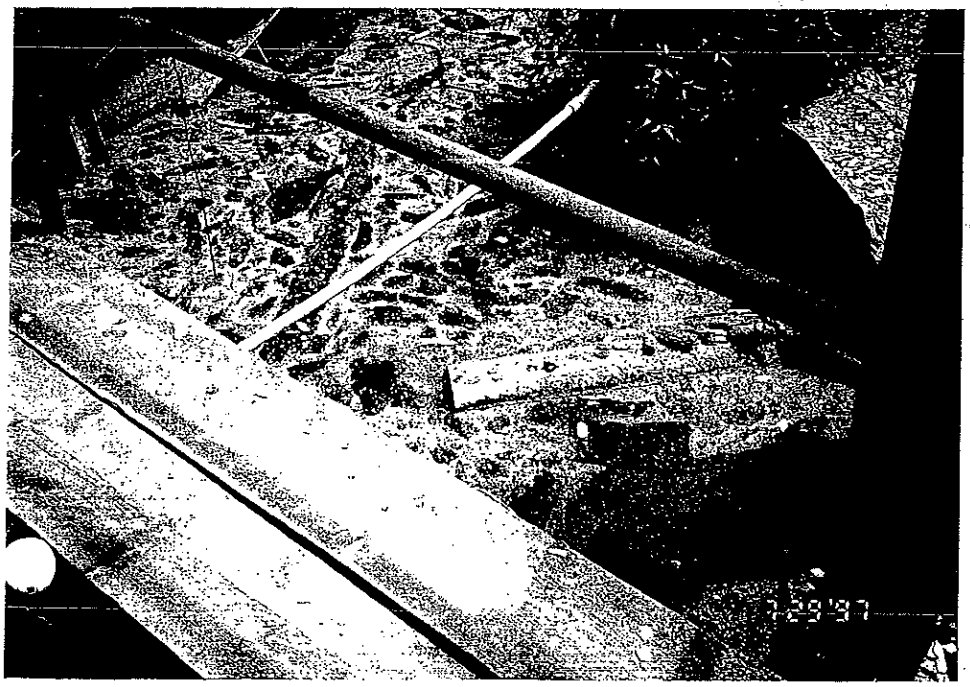

Photo #29

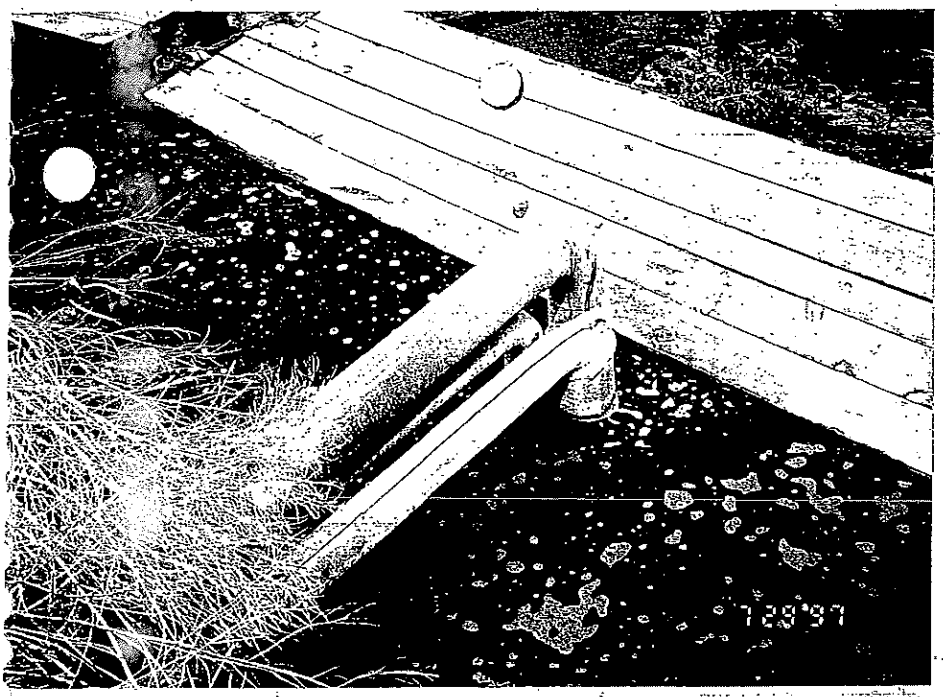

Photo #30

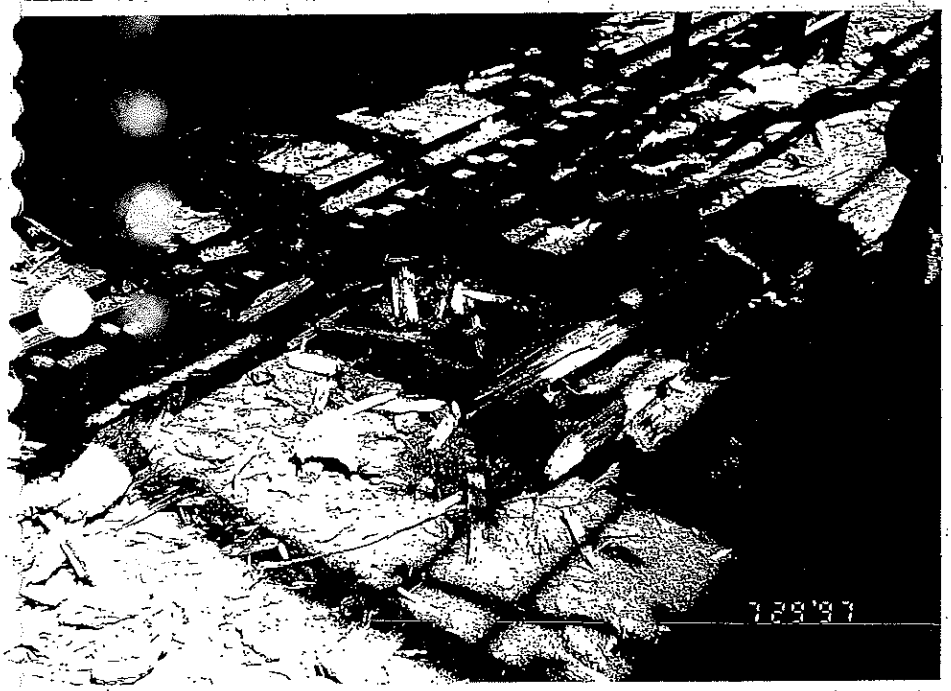

Photo #31

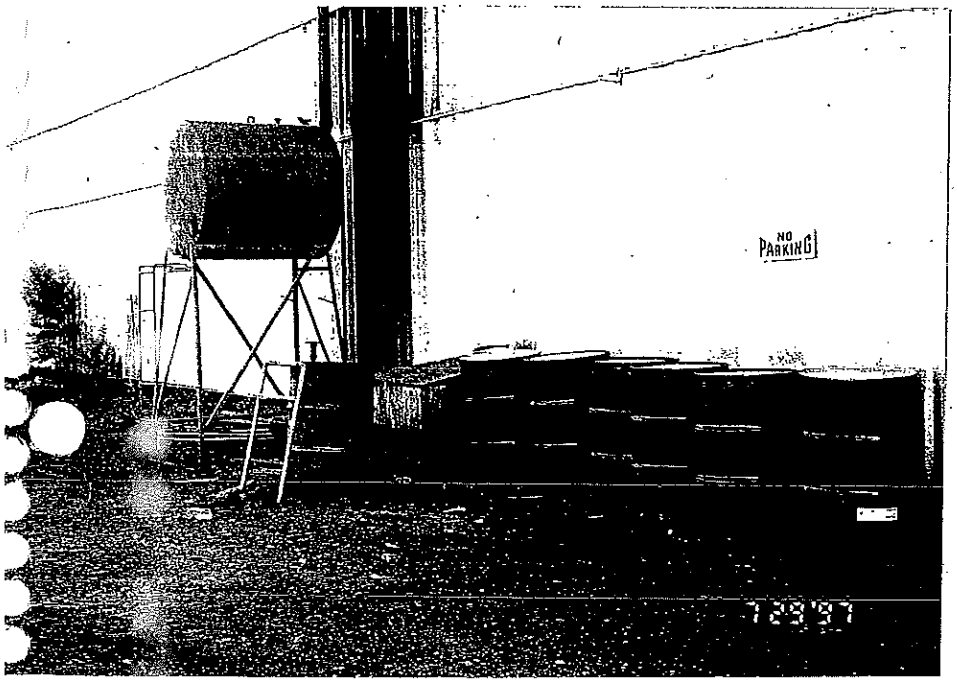

Photo #32

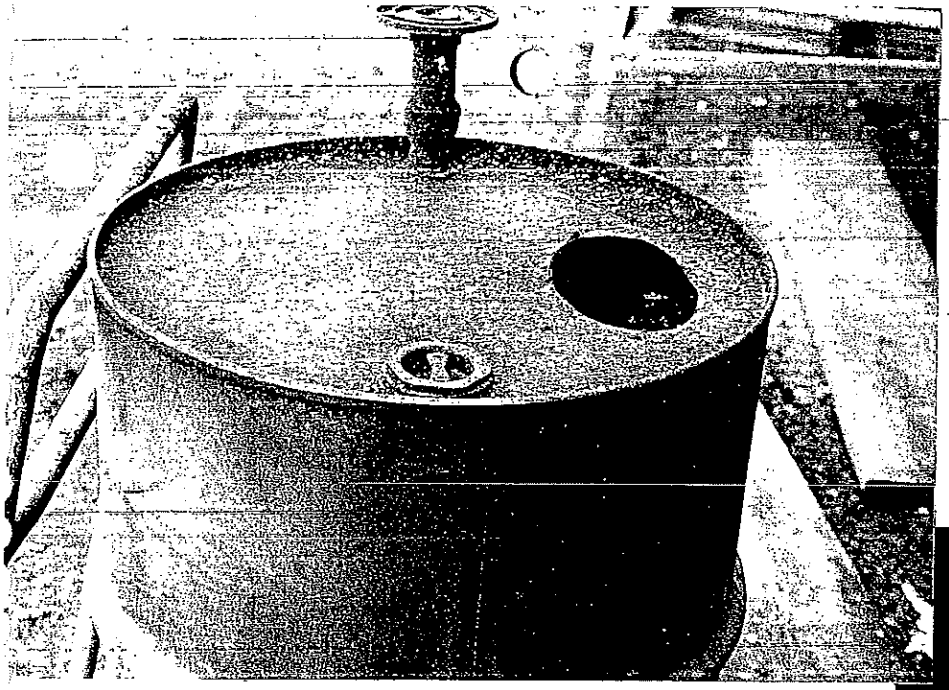

Photo #33

Photo #34

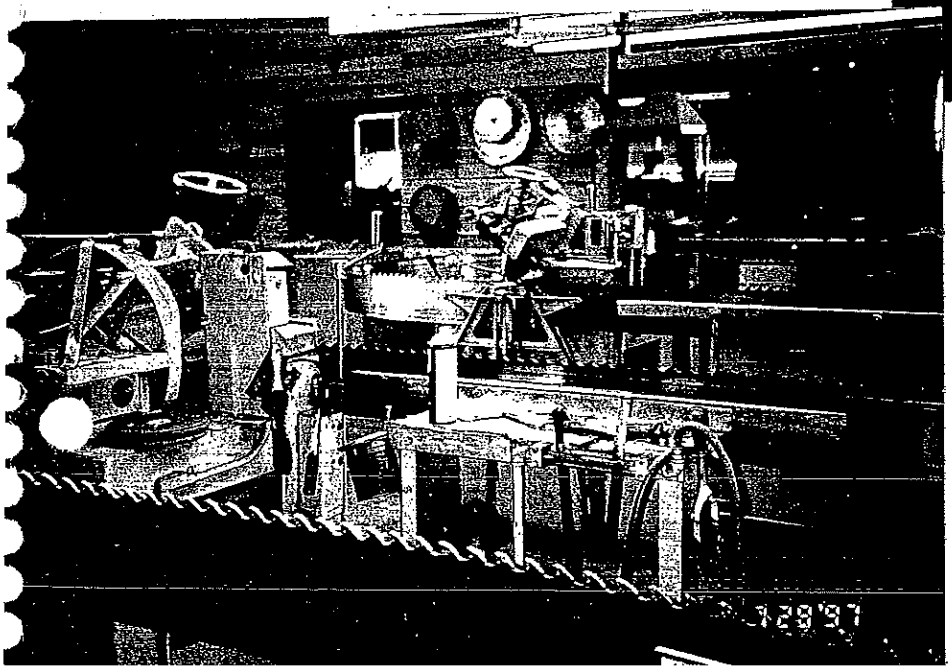

Photo #35

Photographs were taken by Jeff Ingalls with a Pentax IQ Zoom 90-WR:

Photo #1	Drum of used oil between office and truck shop;
Photo #2&3	Approximately 150 gallons of used oil stored outside the truck shop (July 16, 1997);
Photo #2A&3A	Used oil stored outside the truck shop taken September 16, 1997 seven weeks after photograph 2;
Photo 4	Used oil stored outside the truck shop away from primary storage area;
Photo 4A-4C	Used oil stored outside the truck shop away from primary storage area photo taken September 16, 1997, seven weeks after photograph 4.
Photo 5	Abandoned batteries outside the old truck shop next to the batteries was a vent pipe for an unregistered underground storage tank;
~~Photo 6~~	~~Container of~~ unknowns in a grease container in the boneyard;
Photo 7&8	Drums of what appeared to be used oil abandoned in the center of the boneyard;
Photo #9	Photograph of three drums of what turned out to be boiler chemicals abandoned in the boneyard the material was determined to be alum.
Photo 10&11	Transformers observed in the boneyard no PCB labels and leaks were evident around each transformer;
Photo 12-15	Photographs of the sampling activity in and around the 4 transformers soils were sampled around 3 of the 4 transformers;
Photo 16	Photograph of one of several abandoned drums of material in the boneyard;
Photo 17	Photograph of another drum of unknown material abandoned in the boneyard the contents of this drums was sampled July 30, 1997;
Photo 18-20	Photograph of the sampling activity of the drum shown in photograph 17;
Photo 21&22	Photographs of the wooden container in the boneyard that contained asbestos materials;

Photo 23-28	Photographs of sampling activity surrounding the blocks of material in the wooden box in the boneyard;
Photo 29&30	Photographs of outfalls from the boiler room into the log floating pond;
Photo 31	Photograph of a spill of hydraulic oil at the debarker;
Photo 32	Photograph of several empty drums against the wall of the small logmill the one drum set away from the wall contained used oil;
Photo 33	Photograph of the drum shown in photograph 32 that is set away from the wall showing that it contained used oil and was full and open;
Photo 34	Photograph showing product storage at the small log mill;
Photo 35	Photograph of the blade shop in the small logmill the blade shops in both the large and small log-mills the facility did not use any caustic cleaners.

APPENDIX B

AUGUST 6, 1997 LETTER TO MR. LYON

Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
2146 NE 4th Street, Suite 104
Bend, OR 97701
(541) 388-6146
Eastern Region
Bend Office

August 6, 1997

Steve Lyon, Human Resource Manager
Ochoco Lumber
P.O. Box 668
Prineville, Oregon 97754

Dear Mr. Lyon:

This letter is in response to the inspection that we conducted at your facility on July 29 & 30, 1997. It is my common practice to prepare a formal Notice of Noncompliance (NON) within two weeks of conducting an inspection. As this will not be possible, because I will be on vacation, I will summarize the observations and potential violations that I observed during that inspection in this letter. The problems identified in this letter need to be addressed in the near future.

HAZARDOUS WASTE:

* Unknown wastes were observed in the boneyard. Several containers in the boneyard contained waste that you could not identify. You need to identify the contents of those containers and properly manage the material in the containers. You must provide the department a summary of what was determined to be in the drums stored in the boneyard. The summary should include the contents of the cardboard drums, the contents of the small grease container near the locked up old truck shop, and the contents of several 55 gallon drums in the center of the boneyard. The summary should also include how you intend or how you did manage the material in the drums.

* You also must immediately stop dumping your antifreeze into the used oil and then dumping the mixture onto the hogged fuel pile. Antifreeze fails as a hazardous waste for metals about 40% of the time. You should collect your antifreeze onsite and make an effort to recycle it. I will provide you a list of possibilities at a later date.

* The solvent tank in the small log mill is still a mystery as I spoke with Safety-Kleen and they do not manage that tank and I spoke with NAPA Auto and they do not manage the tank. I would like to know who cleans out the tank and how much waste solvent is in the tank when it is cleaned out? The container under the cleaning station appeared to be a 55 gallon drum.

* There were also three batteries abandoned in the boneyard by the locked up old truck shop. The batteries if abandoned and not destined for recycling would be a hazardous waste. The batteries should be picked up and placed near the truck shop that is currently in operation and should be recycled at your convenience.

TOXIC SUBSTANCES CONTROL ACT:

Asbestos:

* The material in the large wooden box in the back of the boneyard was 10% asbestos, making the material regulated. The wire insulation was not asbestos. For further information on what needs to be done with this material you should contact Frank Messina, DEQ Air Quality (541)388-6146 Ext. 226.

PCBs:

* All four of the transformers had released oil. None of the transformers were labeled non-PCB. If there is no label on the transformer then the transformer is assumed to be a high level PCB transformer. The samples taken from releases around three of the four transformers were determined to be non PCB releases. You must now take a sample of the oil in each of the four transformers to determine if they are PCB transformers or not. If they are not PCB transformers no EPA referral will be required. If they are PCB transformers then a referral to EPA will be necessary.

USED OIL:

* Used oil containers throughout the facility, specifically identified behind the small log mill, in the boneyard, and at the truck shop, need to be labeled with the words "used oil."

* Releases of used oil were evident outside the truck shop and at the debarker by the pump house. Upon detection of a spill or release of used oil, you must immediately stop the release, clean up the spill, and manage the contaminated media and debris in compliance with applicable solid or hazardous waste rules.

* The containers of used oil observed at the truck shop, behind the small sawmill and in the boneyard must be in good condition and closed or covered in such a manner that rainwater cannot enter the container.

The activity you have selected for mixing your used oil with your hogged fuel and burning it in your boiler can only continue if you test the oil for on-specification or off-specification used oil. If the oil is determined to be on-specification it can be burned in your boiler as on-specification used oil fuel. This activity would be in compliance with used oil regulations. However, if the used oil was determined to be off-specification then you would need to notify as a used oil burner for energy recovery and comply with all regulations pertaining to used oil burners.

If you elect to continue the practice of burning used oil in your boiler you should contact Frank Messina with DEQ's Air Quality Program and advise him of the situation. This activity may require you to source test during the times that used oil fuel is being used as a fuel source.

UNDERGROUND STORAGE TANK:

* What appeared to be an underground storage tank vent was observed outside the locked up old truck shop. You must determine first if it is a tank, second if it is a tank does it contain a regulated substance, if it does contain a regulated substance you must contact the Department's Underground Storage Tank Program in Bend for further guidance. If it does not contain a regulated substance you must determine when the tank was last used.

This letter is to serve as a summary letter outlining potential violations of State and Federal regulations observed during your facility's inspection. A NON will be forthcoming and formal enforcement may be necessary depending on sample results. The purpose of this letter is to allow you the opportunity to begin cleaning up some of the problems observed during this inspection. If you should have any further questions pertaining to hazardous waste management please contact me at the Eastern Regional Office in Bend (503) 388-6146 Ext. 238 or if you have questions while I'm on vacation you can contact John MacKellar at Ext 229.

Sincerely,

Jeff Ingalls

Jeff Ingalls
Environmental Specialist

APPENDIX C

SAMPLING ANALYSIS FROM DEQ LAB

DEPARTMENT OF [illegible]

Request for Analysis

Case No. 11C0041

Location/Site: Ochoco Lumber - Prineville Date Sampled: 7/30/97

Date Received in Lab: 7/30/97

Collected by: Jeff Ingalls Fund Code: HAZ WASTE Generator 48511

Date Reported: 7/29/97 SEP 16 1997

Purpose: PCB analysis & hazardous waste determination

Report Data to: JEFF INGALLS - EASTERN REGION - BEND (541) 388-6146 Ext 238

Comments: (Sample 1-3 [redacted] suspected PCB contaminated soil / Sample 4 - gasoline contaminated sawdust)

Item #	Sampling Point Description (include time)	Sample container according to test(s) requested: Nutrients / Basic	DO / BOD	Metals / Organic	Misc. / Misc.	Test(s) Required
1	transformer storage area in boneyard 2:50 pm				L004107	Total PCBs
2	transformer storage area in boneyard 2:56 pm				L004097	Total PCBs
3	transformer storage area in boneyard 3:02 pm				L004096	Total PCBs
4	drum of sawdust stored in boneyard west of transformer storage area 3:15 pm			L004112	L004112	TCLP volatiles and flashpoint
5						
6						

STATE OF OREGON
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
SEP 26 1997
EASTERN REGION
BEND

Laboratory Comments:

Contact Sample Tracker for proper sampling containers and preservation procedure. (503) 229-5983

CASE NAME: 970669 Ochoco Lumber - Prineville
SUBMITTER: Ingalls, Jeff COLLECTOR: Ingalls, Jeff
FUND CODE: 48511 Hazardous & Solid Waste Generators

ITEM #	RESULT	UNITS	TEST
001			Transformer storage area in boatyard
	07/30/97 @ 14:50		
	Attached		Completion of PCB
002			Transformer storage area in boneyard
	07/30/97 @ 14:56		
	Attached		Completion of PCB
003			Transformer storage area in boneyard
	07/30/97 @ 15:02		
	Attached		Completion of PCB
004			Drum of sawdust stored in boneyard west of transformer area
	07/30/97 @ 15:15		
	>165	Deg F	Flash Point Temperature
	Attached		TCLP Volatiles

Department of Environmental Quality
Laboratories and Applied Research
GC-ECD

PCBs

Complies with EPA NPDES Method 608 and RCRA Method 8081

Lab #:	970669	Analysis Date:	05 August 1997
Sample #:	BLANK JY		
Item #:	0		

CONC mg/Kg	PCB MIXTURE	CAS #
<0.005	AROCHLOR 1221	11104282
<0.002	AROCHLOR 1232	11141165
<0.001	AROCHLOR 1242 and 1016	53469219/12674112
<0.001	AROCHLOR 1248	12672296
<0.001	AROCHLOR 1254	11097691
<0.001	AROCHLOR 1260	11096825
ND	Total PCB	

ND: No PCB's were observed above the indicated detection limit.

QA SURROGATE	Expected ug/ml	Actual ug/ml	Percent Recovery
Tetrachloro-m-xylene	0.05000	0.04715	94%
Dibutyl Chlorendate	0.05000	0.04545	91%

Department of Environmental Quality
Laboratories and Applied Research
GC-ECD

PCBs

Complies with EPA NPDES Method 608 and RCRA Method 8081

Lab #:	970669	Analysis	
Sample #:	L4107	Date:	05 August 1997
Item #:	1		

CONC mg/Kg	PCB MIXTURE	CAS #
<0.33	AROCHLOR 1221	11104282
<0.13	AROCHLOR 1232	11141165
<0.07	AROCHLOR 1242 and 1016	53469219/12674112
<0.07	AROCHLOR 1248	12672296
<0.07	AROCHLOR 1254	11097691
<0.07	AROCHLOR 1260	11096825
ND	Total PCB	

ND: No PCB's were observed above the indicated detection limit.

QA SURROGATE	Expected ug/ml	Actual ug/ml	Percent Recovery
Tetrachloro-m-xylene	0.65531	0.62582	96%
Dibutyl Chlorendate	0.65531	0.71429	109%

Department of Environmental Quality
Laboratories and Applied Research
GC-ECD

PCBs

Complies with EPA NPDES Method 608 and RCRA Method 8081

Lab #:	970669	Analysis	
Sample #:	L4097 JY	Date:	05 August 1997
Item #:	2		

CONC mg/Kg	PCB MIXTURE	CAS #
<0.40	AROCHLOR 1221	11104282
<0.16	AROCHLOR 1232	11141165
<0.08	AROCHLOR 1242 and 1016	53469219/12674112
<0.08	AROCHLOR 1248	12672296
<0.08	AROCHLOR 1254	11097691
<0.08	AROCHLOR 1260	11096825
ND	Total PCB	

ND: No PCB's were observed above the indicated detection limit.

QA SURROGATE	Expected ug/ml	Actual ug/ml	Percent Recovery
Tetrachlore-m-xylene	0.79554	0.68815	87%
Dibutyl Chlorendate	0.79554	0.87510	110%

Department of Environmental Quality
Laboratories and Applied Research
GC-ECD

PCBs

Complies with EPA NPDES Method 608 and RCRA Method 8081

Lab #:	970669	Analysis	
Sample #:	L4096 JY	Date:	05 August 1997
Item #:	3		

CONC mg/Kg	PCB MIXTURE	CAS #
<0.45	AROCHLOR 1221	11104282
<0.18	AROCHLOR 1232	11141165
<0.09	AROCHLOR 1242 and 1016	53469219/12674112
<0.09	AROCHLOR 1248	12672296
<0.09	AROCHLOR 1254	11097691
<0.09	AROCHLOR 1260	11096825
ND	Total PCB	

ND: No PCB's were observed above the indicated detection limit.

QA SURROGATE	Expected ug/ml	Actual ug/ml	Percent Recovery
Tetrachloro-m-xylene	0.89366	1.13494	127%
Dibutyl Chlorendate	0.89366	0.97408	109%

Department of Environmental Quality
Laboratory Division
GC/MS

Volatile Organic Compounds

Complies with TCLP Method 1311

Lab #:	970669	Analysis	
Sample #:	BLANK	Date:	04 September 1997
Item #:			

CONC mg/L	COMPOUND	CAS #
<0.2	Vinyl Chloride	75014
<0.7	1,1-Dichloroethylene	75354
<0.6	Chloroform	67663
<0.5	Carbon Tetrachloride	56235
<0.5	Benzene	71432
<0.5	1,2-Dichloroethane	107062
<0.5	Trichloroethylene	79016
<0.7	1,1,2,2-Tetrachloroethylene	127184
<100	Chlorobenzene	108907
<7.5	1,4-Dichlorobenzene	106467
<200	Methyl Ethyl Ketone	78933

QA	SURROGATE	Expected mg/L	Actual mg/L	Percent Recovery
	D6-Benzene	0.0100	0.0096	96
	2-Bromo-1-Chloropropane	0.0100	0.0106	106
	4-Bromofluorobenzene	0.0100	0.0082	82

Department of Environmental Quality
Laboratory Division
GC/MS

Volatile Organic Compounds

Complies with TCLP Method 1311

Lab #:	970669	Analysis	
Sample #:	L4112	Date:	04 September 1997
Item #:	4		

CONC mg/L	COMPOUND	CAS #
<0.2	Vinyl Chloride	75014
<0.7	1,1-Dichloroethylene	75354
<0.6	Chloroform	67663
<0.5	Carbon Tetrachloride	56235
<0.5	Benzene	71432
<0.5	1,2-Dichloroethane	107062
<0.5	Trichloroethylene	79016
<0.7	1,1,2,2-Tetrachloroethylene	127184
<100	Chlorobenzene	108907
<7.5	1,4-Dichlorobenzene	106467
<200	Methyl Ethyl Ketone	78933

QA	SURROGATE	Expected mg/L	Actual mg/L	Percent Recovery
	D6-Benzene	0.0100	0.0096	96
	2-Bromo-1-Chloropropane	0.0100	0.0094	94
	4-Bromofluorobenzene	0.0100	0.0096	96

QUALITY ASSURANCE REPORT : METHOD 608 (GC) PCB's

Case Name: OCHOCO LUMBER - PRINEVILLE
Fund Code: 48511

Case #: 970669

Sample date: 30-Jul-97
QA report date: 17-Sep-97

mg/L

Item	Well	Analyte	Initial Sample (A)	(B)	QA Sample (A)	(B)	Average Sample	Average QA	Diff.	% RPD
*			#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A

Surrogate Spike Recovery

Item	Well	{TCMX} Percent Recovery (A)	(B)	(Dibutylchlorendate) Percent Recovery (A)	(B)
0	BLANK	94%		91%	
1	TRANSFORMER STORAGE@2:50pm	96%		100%	
2	TRANSFORMER STORAGE@ 2:56PM	87%		110%	
3	TRANSFORMER STORAGE @ 3:02PM	127%		109%	
	Average Spike Recovery:		101%		103%

Data which is reported as "less than" (<) is used at 1/2 the numerical value to calculate difference and RPD.
Shaded data exceeds QC Criteria. Reported for information only.
* No chlorinated pesticides were identified above the detection limit.
** Exceeds calibration range of GC. Reported for information only.

CES
9/17/97

QUALITY ASSURANCE REPORT: VOLATILE ORGANICS (524.2/8260)

Complies with TCLP Method 1311

Case Name:	OCHOCO LUMBER - PRINEVILLE		
Case #:	970669	Fund Code:	48511
Sample date:	30-Jul-97		
QA report date:	17-Sep-97		

Mg/L

Item	Well	Analyte	Initial Sample (A)	Initial Sample (B)	QA Sample (A)	QA Sample (B)	Average Sample	Average QA	Diff.	% RPD
*			#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A

Surrogate Spike Recovery — PERCENT RECOVERY

Item	Well	{2-Bromo-1-Chloropropane} (A)	{2-Bromo-1-Chloropropane} (B)	{4-Bromofluorobenzene} (A)	{4-Bromofluorobenzene} (B)	D6-benzene (A)	D6-benzene (B)
0	BLANK	106%		82%		96%	
4	DRUM OF SAWDUST	94%		96%		96%	
	Average Spike Recovery:	100%		89%		96%	

Data reported as "less than" (<) is used at 1/2 the numerical valueto calculate difference and RPD

Shaded data exceeds QC Criteria. **Reported for information only.**

* No volatile compounds identified above the forward search detection limit.

Exceeds calibration range of GC/MS. **Reported for information only.**

CES
9/17/97

APPENDIX D

SAFETY-KLEEN BILL OF LADING

1000 North Randall Road
Elgin, Illinois 60123-7857

WE CARE

DUNS NO. 05106-0408 FED. ID NO. 36-3690019

FOR SERVICE CALL	TRANSPORTER	DOC. EXP.	SCHEDULED SERVICE WEEK	SCHEDULED TERRITORY	REFERENCE NUMBER
541-747-5804	MONIQUE SCHMIDT	06/21/97	97-17	07	728047

CUSTOMER ACCOUNT NO.: 7-054-1-4159-6

CREDIT CODE	PREV. BALANCE	BAL. OVER 60 DAYS
C	249.25	

BUSINESS TYPE	CHAIN	OUTER COUNTY	SVC. P/C	PROD. P/C
09	NO	YES	292	001

TAX EXEMPTION NUMBER

CUSTOMER

BILL TO
D CHOCO LUMBER
416 COMBS FLAT RD
PO BOX 668
PRINEVILLE OR 97754

SERVICE DATE	SALES REP NO.	CUSTOMER P.O. NUMBER	CUSTOMER PHONE #	TAX CODE	HANDLING CODE	ASSOC. CODE	SERVICE TAX	C.O.M.S. TAX	PRODUCT TAX
6/23/97	3242		541-447-7673	38-035-6688					

SERVICE/ PRODUCT	SERIAL NUMBER	REMARKS	QUAN.	CHARGE	SALES TAX	TOTAL CHARGE	WASTE MIN.	SOLVENT/DRUMS CLEAN	SPENT	# OF CONT.	SK DOT	CC	SERVICE TERM	CHANGE SERVICE TERM (WEEKS)	(INITIAL)	CHANGE SCH. DATE (YY WW)	INV. CODE	PROMO NO.	RELEASE NO.	MSDS GIVEN
030300	30171167		1	138.75	0.00	138.75	0.00	1	1	1	10083		8							
TOTAL-SERVICE/PRODUCTS				138.75	0.00	138.75	0.00													

CHECK APPROPRIATE BOXES →

	GOOD	POOR
MACHINE CONDITION & CLEANLINESS	☐	☐
LAMP ASSEMBLY CONDITION	☐	☐

	YES	NO
DECALS IN PLACE AND LEGIBLE	☐	☐
FUSIBLE LINK INSTALLED	☐	☐
EMERGENCY CLOSING OF LID UNOBSTRUCTED	☐	☐
MACHINE PROPERLY GROUNDED	☐	☐
LOCAL PHONE NO. STICKER AFFIXED TO MACHINE	☐	☐
SPENT SOLVENT MEETS ACCEPTANCE CRITERIA	☐	☐

WE CARE

MANIFEST NO.	USEPA TRANSPORTER ID NO.	GENERATOR USEPA ID NO.	GENERATOR STATE ID NO.
XXXXX	ILD984908202		

11. US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.)
RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)
NA1993 PGIII(D001) (D006,D008,D018,D027,D039D040)(ERG#128)

12. CONTAINERS NO.	TYPE	13. TOTAL QUANTITY	14. UNIT WT/VOL	SK DOT NUMBER
1	DM	15	G	10083

5 1 6 0 5 5 1

I CERTIFY THAT MY TOTAL WASTE STREAMS ARE WITHIN ONE OF THE FOLLOWING CATEGORIES.

0 TO 220 LBS./MONTH — INITIALS: BO
220 LBS. TO 2,200 LBS./MONTH — INITIALS:
GREATER THAN 2,200 LBS./MONTH — INITIALS:

DESIGNATED FACILITY NAME AND ADDRESS: SAFETY-KLEEN CORP.
550 SHELLY STR. SPACE C&D SPRINGFIELD, OR 97477

USA EPA ID NO. ORD000712067
STATE ID NO.

PAYMENT RECEIVED SECTION

CASH ☐	TOTAL RECEIVED	APPLY PAYMENT TO:
CHECK NUMBER		☐ TODAY'S SERVICE/SALE ☐ PREVIOUS BALANCE AS FOLLOWS

INVOICE #	AMOUNT $	INVOICE #	AMOUNT $

PREVIOUS CREDIT CARD NO.:
CREDIT CARD NO.: AMEX VISA MC EXP. DATE

LDR MESSAGE: LDR NOT REQ'D

MANIFEST CODE	SEQ #
DP	241

IN THE EVENT OF AN EMERGENCY CALL

I AGREE TO PAY THE ABOVE CHARGES AND TO BE BOUND BY THE TERMS AND CONDITIONS SET FORTH ABOVE AND ON THE REVERSE SIDE OF THIS DOCUMENT. PLEASE CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. THE INDIVIDUAL SIGNING THIS DOCUMENT IS DULY AUTHORIZED TO SIGN AND BIND CUSTOMER TO ITS TERMS.

"This is to certify that the above-named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation."

Print Customer Name: BEN OWENS

By: Ben Owens
Customer's Authorized Representative

TOTAL CHARGE (FROM ABOVE)	
WASTE MIN. (FROM ABOVE)	
TOTAL DUE	138.75

728047

7-054 1-4159-6

SERVICE AND SALES ACKNOWLEDGMENT

APPENDIX E

NOTICE OF NONCOMPLIANCE & NOTICE OF ASSESSMENT OF CIVIL PENALTY FROM AIR QUALITY

Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
2146 NE 4th Street, Suite 104
Bend, OR 97701
(541) 388-6146

Eastern Region

Bend Office

August 11, 1997

Stuart J. Shelk, Jr.
Ochoco Lumber Company
P.O. Box 668
Prineville, OR 97754

Re: **NOTICE OF NONCOMPLIANCE**
AQ-ERB-97-0067
Open Storage of Friable Asbestos
Title V Permit #07-0005
Crook County

Dear Mr. Shelk:

On July 29, 1997, Jeff Ingalls and John MacKeller from the Department's Hazardous Waste Program conducted an inspection at the Ochoco Lumber Company sawmill located on Combs Flat Road in Prineville, Oregon. During their inspection they observed what appeared to be asbestos containing-material in a partially covered wood container in the bone yard, located at the southeast corner of the facility. On July 30, 1997, I accompanied Jeff Ingalls and John MacKeller, along with Steve Lyons from Ochoco Lumber to take samples in the bone yard. There I observed a wood container (approximately 9' long, 4' wide, and 3' high) with one side missing and some white blocks (each 7" by 5", by 2" thick) exposed to the atmosphere at the open end of the container. When we opened the top of the container I observed broken brown plastic bags that appeared to previously contain the same white blocks. The plastic bags were observed to be falling apart, exposing the surfaces of a number of the white blocks. Three samples of the friable white blocks were taken at three different locations in the wood container. The results of the laboratory analysis indicated that the three samples contained 10% asbestos (both chrysotile and amosite). The Department regulates asbestos-containing material containing more than one percent (1%) by weight. On August 5, 1997, I contacted Steve Lyons and informed him of the sample results. I requested him to cover the wood container with a tarp until a certified asbestos abatement contractor could remove and dispose of the asbestos containing material.

Oregon Administrative Rule (OAR) Violations:

Class I Violation
OAR 340-32-5620(2): Open storage of friable asbestos-containing material or asbestos-containing waste material is prohibited.

Class I Violation
OAR 340-32-5650(2)(b): Failing to package asbestos-containing material/waste in a leak tight container (two plastic bags, each a minimum of 6 mil. thickness) is a violation.

On April 11, 1996, Ochoco Lumber Company was issued a Title V Air Permit No. 07-0005 from the Department. This permit contains conditions on asbestos removal, storage, and disposal.

Title V Permit Violation:

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-32-5600 through 5650 and OAR Chapter 340, Division 33 (state-only enforceable).

These Class I violations are considered to be significant violations of Oregon environmental law. Therefore, we will refer your file to the Department's Enforcement Section with a recommendation to proceed with a formal enforcement action which may result in a civil penalty assessment. Civil penalties can be assessed for each day of violation.

CORRECTIVE ACTION:

Ochoco Lumber Company shall contract with an asbestos certified abatement contractor to remove and dispose of the asbestos-containing material according to the regulations. This action will be done as soon as feasible. Through the asbestos notification process the Department will be informed of the abatement project.

If you have any questions concerning this issue please contact me at (541) 388-6146, extension 226.

Sincerely,

Frank Messina

Frank Messina
Environmental Specialist

FCM/ns

cc: Air Quality Division, DEQ, Portland
Sarah Armitage, Air Quality Title V Program
Enforcement Section, DEQ, Portland
Jeff Ingalls, Hazardous Waste Program, DEQ, Bend
Steve Lyon, Ochoco Lumber Company

Oregon

DEPARTMENT OF
ENVIRONMENTAL
QUALITY

September 12, 1997

CERTIFIED MAIL P 494 534 472

Ochoco Lumber Company
c/o Ochoco Management, Inc.
Attn. Stuart J. Shelk, Registered Agent
P.O. Box 668
Prineville, OR 97754

Re: Notice of Assessment of
Civil Penalty
Case No. AQ/V-ER-97-179
Crook County

On July 29, 1997, Department personnel conducting a hazardous waste management inspection at Ochoco Lumber Company's (Ochoco Lumber's) sawmill on Combs Flat Road in Prineville observed what appeared to be asbestos-containing material (ACM) in a partially-covered wood container in the mill's bone yard. On July 30, 1997, DEQ air quality staff investigated the area and found broken plastic bags of suspected ACM in the container. Samples of the material were taken, analyzed, and determined to contain 10% asbestos fiber. Ochoco's failure to store or dispose of the ACM in accordance with Department rules violates Oregon environmental law prohibiting the open accumulation of friable ACM or asbestos-containing waste material. This is a Class I violation.

Exposure to asbestos is a serious health hazard and can result in incurable lung disease, including cancer. There is no known safe level of exposure to asbestos. To protect the public and the environment, the state legislature has enacted statutes and the Department has promulgated rules strictly controlling the removal, handling, storage, and disposal of ACM. Ochoco Lumber's failure to comply with these rules created a potential risk to public health and the environment.

Ochoco Lumber is liable for a civil penalty assessment because it violated Oregon environmental law. In the enclosed Notice, I have assessed a civil penalty of $3,600. In determining the amount of the penalty, I used the procedures set forth in Oregon Administrative Rule (OAR) 340-12-045. The Department's findings and civil penalty determination are attached to the Notice as Exhibit 1.

Appeal procedures are outlined in Section VI of the Notice. If Ochoco Lumber fails to either pay or appeal the penalty within twenty (20) days, a Default Order will be entered against it.

If Ochoco Lumber wishes to discuss this matter, or if it believes there are mitigating factors which the Department might not have considered in assessing the civil penalty, Ochoco Lumber may request an informal discussion by attaching

811 SW Sixth Avenue
Portland, OR 97204-1390
(503) 229-5696
TDD (503) 229-6993

a request to its appeal. Ochoco Lumber's request to discuss this matter with the Department will not waive its right to a contested case hearing.

I look forward to Ochoco Lumber's cooperation in complying with Oregon environmental law in the future. However, if any additional violations occur, Ochoco Lumber may be assessed additional civil penalties.

Copies of referenced rules are enclosed. Also enclosed is a copy of the Department's internal management directive regarding civil penalty mitigation for Supplemental Environmental Projects (SEPs). If Ochoco Lumber is interested in having a portion of the civil penalty fund an SEP, it should review the enclosed SEP directive.

If Ochoco Lumber has any questions about this action, please contact Jeff Bachman with the Department's Enforcement Section in Portland at (503) 229-5950 or toll-free at 1-800-452-4011, enforcement extension 5950.

Sincerely,

Langdon Marsh
Director

STATE OF OREGON
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
SEP 18 1997
EASTERN REGION
BEND

e:\winword\letters\ocholtr.doc
Enclosures
cc: Eastern Region, Bend Office, DEQ
Air Quality Division, DEQ
Department of Justice
Environmental Protection Agency
Environmental Quality Commission
Crook County District Attorney

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION

OF THE STATE OF OREGON

IN THE MATTER OF: OCHOCO LUMBER COMPANY, an Oregon limited partnership, Respondent.	NOTICE OF ASSESSMENT OF CIVIL PENALTY No. AQ/V-ER-97-179 CROOK COUNTY

I. AUTHORITY

This Notice of Assessment of Civil Penalty (Notice) is issued to Respondent, Ochoco Lumber Company, by the Department of Environmental Quality (Department) pursuant to Oregon Revised Statutes (ORS) 468.126 through 468.140, ORS Chapter 183, and Oregon Administrative Rules (OAR) Chapter 340, Divisions 11 and 12.

II. VIOLATIONS

1. On and before July 29 and 30, 1997, Respondent violated OAR 340-32-5600(4) by openly accumulating friable asbestos-containing material or asbestos-containing waste material. Specifically, Respondent caused or allowed to be stored or disposed, friable asbestos-containing waste material not securely enclosed as prescribed by OAR 340-32-5650, on property it owned or controlled on Combs Flat Road, Prineville, Oregon. This is a Class I violation pursuant to OAR 340-12-050(1)(p).

2. On and before July 29 and 30, 1997, Respondent violated General Condition G9 of its Title V Operating Permit, No. 07-0005, by failing to comply with OAR 340-32-5600 through -5650. Specifically, Respondent failed to comply with OAR 340-32-5600(4) by openly accumulating friable asbestos-containing waste material on property it owned or controlled on Combs Flat Road in Prineville, Oregon. This is a Class II violation pursuant to OAR 340-12-050(2)(x).

III. ASSESSMENT OF CIVIL PENALTIES

The Department imposes a civil penalty of $3,600 for Violation No. 1 in Section II, above. The findings and determination of Respondent's civil penalty, pursuant to OAR 340-12-045, are attached and incorporated as Exhibit 1.

IV. OPPORTUNITY FOR CONTESTED CASE HEARING

Respondent has the right to have a formal contested case hearing before the Environmental Quality Commission (Commission) or its hearings officer regarding the matters set out above, at which time Respondent may be represented by an attorney and subpoena and cross-examine witnesses. **The request for hearing must be made in writing, must be received by the Department's Rules Coordinator within twenty (20) days from the date of service of this Notice, and must be accompanied by a written "Answer" to the charges contained in this Notice.**

In the written Answer, Respondent shall admit or deny each allegation of fact contained in this Notice, and shall affirmatively allege any and all affirmative claims or defenses to the assessment of this civil penalty that Respondent may have and the reasoning in support thereof. Except for good cause shown:

1. Factual matters not controverted shall be presumed admitted;

2. Failure to raise a claim or defense shall be presumed to be a waiver of such claim or defense;

3. New matters alleged in the Answer shall be presumed to be denied unless admitted in subsequent pleading or stipulation by the Department or Commission.

Send the request for hearing and Answer to: **DEQ Rules Coordinator, Office of the Director, 811 S.W. Sixth Avenue, Portland, Oregon 97204.** Following receipt of a request for hearing and an Answer, Respondent will be notified of the date, time and place of the hearing.

Failure to file a timely request for hearing and Answer may result in the entry of a Default Order for the relief sought in this Notice. Failure to appear at a scheduled hearing or meet a required deadline may result in a dismissal of the request for hearing and also an entry of a Default Order. The Department's case file at the time this Notice was issued may serve as the record for purposes of entering the Default Order.

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V. OPPORTUNITY FOR INFORMAL DISCUSSION

In addition to filing a request for a contested case hearing, Respondent may also request an informal discussion with the Department by attaching a written request to the hearing request and Answer.

VI. PAYMENT OF CIVIL PENALTY

The civil penalty is due and payable ten (10) days after an Order imposing the civil penalty becomes final by operation of law or on appeal. Respondent may pay the penalty before that time. Respondent's check or money order in the amount of $3,600 should be made payable to "State Treasurer, State of Oregon" and sent to the **Business Office, Department of Environmental Quality, 811 S.W. Sixth Avenue, Portland, Oregon 97204.**

9.12.97
Date

Langdon Marsh
Langdon Marsh, Director

EXHIBIT 1

FINDINGS AND DETERMINATION OF RESPONDENT'S CIVIL PENALTY
PURSUANT TO OREGON ADMINISTRATIVE RULE (OAR) 340-12-045

VIOLATION: Open accumulation of friable asbestos-containing material or asbestos-containing waste material in violation of OAR 340-32-5600(4).

CLASSIFICATION: This is a Class I violation pursuant to OAR 340-12-050(1)(p).

MAGNITUDE: The magnitude of the violation is moderate, pursuant to OAR 340-12-090(1)(d)(B), because the amount of friable asbestos-containing material openly accumulated was approximately 150 square feet.

CIVIL PENALTY FORMULA: The formula for determining the amount of penalty of each violation is:
$BP + [(0.1 \times BP) \times (P + H + O + R + C)] + EB$

"BP" is the base penalty which is $3,000 for a Class I, moderate magnitude violation in the matrix listed in OAR 340-12-042(1).

"P" is Respondent's prior significant action(s) and receives a value of 0 as Respondent has no prior significant actions.

"H" is the past history of Respondent in taking all feasible steps or procedures necessary to correct any prior significant action(s) and receives a value of 0 as Respondent has no prior significant actions.

"O" is whether or not the violation was a single occurrence or was repeated or continuous during the period of the violation and receives a value of 2 as the violation occurred for more than one day.

"R" is the cause of the violation and receives a value of 2 as Respondent was negligent in that it failed to exercise reasonable care to avoid the foreseeable risk of committing the violation.

"C" is Respondent's cooperativeness in correcting the violation and receives a value of -2 as Respondent promptly corrected the violation.

"EB" is the approximate dollar sum of the economic benefit that the Respondent gained through noncompliance, and receives a value of 0 as there is insufficient information with which to make a calculation.

PENALTY CALCULATION:

$$\begin{aligned} \text{Penalty} = BP &+ [(0.1 \times BP) \times (P + H + O + R + C)] + EB \\ &= \$3,000 + [(0.1 \times \$3,000) \times (0 + 0 + 2 + 2 + (-)2)] + \$0 \\ &= \$3,000 + [(\$300 \times 2)] + \$0 \\ &= \$3,000 + \$600 + \$0 \\ &= \$3,600 \end{aligned}$$

Oregon
John A. Kitzhaber, M.D., Governor

Department of Environmental Quality
2146 NE 4th Street, Suite 104
Bend, OR 97701
(541) 388-6146
Eastern Region
Bend Office

CERTIFIED MAIL #Z700336079
RETURN RECEIPT REQUESTED

October 6, 1997

RECEIVED
'97 OCT 8 AM 10 12
OCHOCO LUMBER CO.

Steve Lyon, Human Resource Manager
Ochoco Lumber
P.O. Box 668
Prineville, Oregon 97754

Re: NOTICE OF NONCOMPLIANCE
HW-ERB-97-0080
Hazardous Waste Violations
Used Oil Management Violations
Ochoco Lumber Company
Crook County

Dear Mr. Lyon:

This Notice of Noncompliance (hereinafter "Notice") is being issued to you based on findings from compliance inspections conducted at Ochoco Lumber Company's facility located in Prineville, Oregon. An inspection was conducted on July 29 and 30, 1997 with a follow up inspection on September 16, 1997. The inspection was performed by representatives of the Oregon Department of Environmental Quality (DEQ), pursuant to Section 3007(a) of the Resource Conservation and Recovery Act (RCRA) and Oregon Revised Statutes (O.R.S.) 466.195, 459.385 and 466.805.

The inspection was conducted as a result of a complaint received by our agency concerning used oil management activities and wastewater discharges to your log floating pond. The inspection was scheduled and conducted to determine whether hazardous waste management activities and used oil activities at your Prineville facility were in compliance with applicable state and federal hazardous waste and used oil regulations. These regulations are found in the Oregon Administrative Rules Chapter 340 (OAR 340) and the Code of Federal Regulations (40 CFR 260-270 and 279).

As a result of this inspection, Ochoco Lumber's Prineville facility was determined to be a conditionally exempt generator of hazardous waste and a used oil generator. The following hazardous waste, used oil violations and Division 108 spill requirements were observed during the inspections:

HAZARDOUS WASTE REGULATIONS:

Violation 1 - Class 1; Failure to make hazardous waste determinations:

OAR 340-102-011 and 40 CFR 262.11 require generators of solid wastes to determine if their solid wastes are hazardous wastes. Ochoco Lumber failed to make a hazardous waste determination on the following wastestreams:

* Used oils generated at the truck shop, the planer room, and the large and small logmill;
* Antifreeze generated at the truck shop; and
* Drums and containers stored in the boneyard.

USED OIL REGULATIONS:

Violation 1 - Class 2

OAR 340-111-032 and 40 CFR 279.22(c) require generators of used oil to label containers with the words "used oil." Ochoco Lumber Company failed to label used oil containers with the words "used oil" at the following locations:

* outside the truck shop;
* a shed between the office and the truck shop;
* five 55 gallon drums stored in the center of the boneyard; and
* a 55 gallon drum behind the small log mill.

Violation 2 - Class 2

OAR 340-111-032 and 40 CFR 279.22(d); require generators of used oil to clean up any releases of used oil. Ochoco Lumber Company failed to clean up visible releases of used oil at the following locations:

* outside the truck shop
* five 55 gallon drums stored in the center of the boneyard; and
* a 55 gallon drum behind the small log mill.

Violation 3 - Class 2

OAR 340-111-032(2), require containers used to store used oil, to be closed, covered, or located under cover to prevent rainwater from coming in contact with the used oil. Ochoco Lumber Company failed to keep containers of used oil covered at the following locations:

* outside the truck shop; and
* a 55 gallon drum behind the small log mill.

Division 108 Spill Requirements:

Violation 1 - Class 1

OAR 340-108-030(1) require facilities that spill or release oil or hazardous material to the surface of the land to immediately cleanup the spill or release consistent with sections OAR 340-108-130(2)&(3). Ochoco Lumber failed to make an effort to clean up spills in the following areas:

* stop an ongoing equipment leak at the debarker; and

* clean up releases of oils from transformers stored in the boneyard.

Some of the violations cited above are Class I violations and are considered to be serious violations of Oregon's environmental law. Because of these violations a referral is being prepared for more formal enforcement action. A formal enforcement action may include a civil penalty assessment.

You are to immediately correct the violations identified in this Notice. **Within 30 days of receipt of this Notice, the Department requests a report stating what measures have been or are proposed to be taken, to correct and control the violations outlined in this Notice.** Your response must describe the measures taken to prevent the violation from recurring. Actions including, but not limited to, the following will be required to achieve compliance with the hazardous waste regulations:

HAZARDOUS WASTE

Violation 1:

* Unknown wastes were observed in the boneyard. Several containers in the boneyard contained waste that you could not identify. You need to identify the contents of those containers and properly manage the material in the containers. In your report you must summarize what was determined to be in the drums stored in the boneyard. The summary should include the contents of the cardboard drums, the contents of the small grease container near the locked up old truck shop, and the contents of several 55 gallon drums in the center of the boneyard. The summary should also include how you intend or how you did manage the drums that were determined to be usable material.

Sampling results for the transformers in the boneyard should also be provided to the agency to demonstrate that the

transformers do not contain PCBs. Sample results for three of the transformers were observed during the follow up inspection. Please provide those results and results obtained from the transformers that had not been sampled.

* You also must immediately stop dumping your antifreeze into the used oil and then dumping the mixture onto the hogged fuel pile. Antifreeze fails as a hazardous waste for metals about 40% of the time. You should collect your antifreeze onsite and make an effort to recycle it. Opportunities for recycling include Spencer Environmental, Safety-Kleen and High Desert Recycling.

* You must also immediately stop mixing your used oil with your hogged fuel and burning that mixture in your boiler. If this practice is something that you want to continue you will need to sample the used oil prior to mixing it in with your hogged fuel and you will need to notify the Department's Air Quality Program and ensure that this activity is consistent with your air quality permit.

* There were also three batteries abandoned in the boneyard by the locked up old truck shop. The batteries if abandoned and not destined for recycling would be a hazardous waste. The batteries should be picked up and placed near the truck shop that is currently in operation and should be recycled at your convenience.

USED OIL

Violation 1-3:

* Used oil containers throughout the facility, specifically identified behind the small log mill, in the boneyard, and at the truck shop, need to be labeled with the words "used oil."

* Releases of used oil were evident outside the truck shop, in the boneyard, and behind the small sawmill. Upon detection of a spill or release of used oil, you must immediately stop the release, clean up the spill, and manage the contaminated media and debris in compliance with applicable solid or hazardous waste rules. Significant releases such as those observed at the truck shop will require formal clean up.

* The containers of used oil observed at the truck shop, behind the small sawmill and in the boneyard must be in good condition and closed or covered in such a manner that rainwater cannot enter the container. Releases were

significant and ongoing for over 7 weeks from the date of my initial inspection.

The activity you have selected for mixing your used oil with your hogged fuel and burning it in your boiler can only continue if you test the oil for on-specification or off-specification used oil. If the oil is determined to be on-specification it can be burned in your boiler as on-specification used oil fuel. This activity would be in compliance with used oil regulations. However, if the used oil was determined to be off-specification then you would need to notify as a used oil burner for energy recovery and comply with all regulations pertaining to used oil burners.

If you elect to continue the practice of burning used oil in your boiler you should contact Frank Messina with DEQ's Air Quality Program and advise him of the situation. This activity may require you to source test during the times that used oil fuel is being used as a fuel source.

Division 108 spill requirements:

Violation 1:

Spills of material other than used automotive oils were observed in the boneyard around 4 transformers and at the debarker. You must immediately clean up the releases and conduct confirmatory samples to show that the clean up was adequate. Contaminated soils from these materials can be disposed of at the local landfill as petroleum contaminated soils.

Underground Storage Tank:

There is another area of concern, that being the underground tank at the old truck shop that I identified during the July 29, 1997 inspection and you confirmed as an underground tank on September 23, 1997. Because of your lack of knowledge on the use of this tank I will present the following and you can report to me what your intentions will be regarding this tank.

* If you can definitively prove that this tank was empty and inactive prior to 1974, then it is not a regulated tank. If you determine that it is not a regulated tank subject to Underground Storage Tank (UST) requirements then any clean up from known or unknown releases would be dealt with under the more stringent hazardous waste requirements or the Department's Clean Up Program.

You may want to consider doing the following:

Sample the contents of the tank and conduct soil borings around the tank for the purpose of soil sample collection. Analyze the soils and the contents of the tank for Hydrocarbon Identification (HCID).

If you **do not** find hydrocarbons you can do whatever you would like with the tank (i.e. pull it out of the ground, or cut off the stand pipe, drill a hole in the bottom of the tank, fill the tank with sand and decommission the tank in-situ).

If you find hydrocarbons then you will need to register the tank and pay back fees. If you choose to decommission the tank once it is registered then you could do so under the underground storage tank rules.

In your report please provide me with you thoughts on how you want to proceed with the work on the tank. I will also request any proof of tank activity or lack of activity, and any sampling results if you choose to sample around the tank.

Two copies of your response should be sent to:

Jeff Ingalls
Department of Environmental Quality
2146 N.E. Fourth, Suite 104
Bend, Oregon 97701

It is the Department's policy that hazardous waste be controlled according to a hierarchy of management practices that promote waste source reduction first, followed by waste recycling, waste treatment, and finally waste disposal, in accordance with ORS 465.006. The Department strongly recommends, where applicable, that you consider implementing source reduction and recycling options to prevent the violations outlined in this Notice from recurring. In your response, please provide a description of any steps that you take to correct the violations through source reduction or recycling.

Some of the opportunities we discussed for waste reduction and pollution prevention included:

* Do not use a solvent degreasing station in the logmill as nobody really had a clue of why it was there or if it had ever been used; and

* For used oil management consider a used oil fired space heater.

If you have questions concerning the implementation of any of these strategies please call me.

The Department is concerned with both the violations and the remedial actions necessary to correct them. If you have any questions regarding this Notice, you may contact me in our Bend Eastern Regional Office at 388-6146, extension 238.

Sincerely,

Jeff Ingalls

Jeff Ingalls,
Environmental Specialist
Hazardous Waste Program

JI:nw
enclosure
cc: Hazardous Waste Section:DEQ

Ochoco Lumber Company
Manufacturers of Ponderosa Pine
P.O. Box 668 • Prineville, Oregon 97754
(541) 447-6296

October 22, 1997

Jeff Ingalls, Environmental Specialist
Department of Environmental Quality
Hazardous Waste Program
2146 NE 4th Street, Suite 104
Bend, OR 97701

Re: Notice of Noncompliance
HW-ERB-97-0080
Hazardous Waste Violations
Used Oil Management Violations
Ochoco Lumber Company
Crook County

Dear Mr. Ingalls,

Following is Ochoco Lumber Company's report on the measures we have already taken and what measures we are proposing to take to correct the violations outlined in the above referenced NON.

HAZARDOUS WASTE

Violation 1:

The cardboard containers in the bone yard contained alum. At one time we used this in our water softener treatment for our boilers. When we changed water softeners a number of years ago we put the drums of alum we had left over out in the bone yard. The alum was identified as such by power house employees who have been involved in the boiler water treatment for a number of years. The alum was taken to the local land fill as it is not a hazardous waste.

The small grease container contained oil and water. This was dumped into a large drum with other used oil and the old grease container was discarded as it was no longer in working condition.

The 55 gallon drums in the bone yard all contained motor oil. We had them tested by Safetyclean personnel. None of this material will be used in any application. They have been labeled as used oil. We intend to purchase a waste oil burner for our truck shop and burn all of our waste oil, including what we presently have on sight, in that burner. I am

Enclosing a quote we recently received from a waste oil burner supplier. As you can see, the burners are rather expensive. We hope to have one installed by the end of the year.

The transformer testing results are enclosed. Included is the test results from the 4th transformer. There are no PCB's in any of the 4 transformers.

We have stopped mixing antifreeze with used oil and burning it with our hog fuel. Used antifreeze will be collected on sight in the future and one of the recycling firms you mentioned will be used to handle this problem.

As is mentioned above, we no longer mix our used oil with hog fuel. We are going to purchase a waste oil burner for that purpose.

The three batteries have been recycled through NAPA.

USED OIL

Violation 1-3:

* The used oil containers throughout the facility have been labeled as such.

- The contaminated soil areas around the plant - outside the truck shop, and in the bone yard - will be cleaned up and disposed of at the local landfill as petroleum contaminated soil.

UNDERGROUND STORAGE TANK:

The underground tank you identified on July 29, 1997 is not an underground tank. I do no recall confirming it as such. Upon investigation, it has been determined that this is the sight of a shallow "sand point" well. There is no tank to decommission.

Sincerely,

Steve Lyon
Ochoco Lumber Company

Environmental Consulting & Investigation ECI

777 N.W. Wall St.
Suite 306
Bend, Oregon 97701
(541)383-1406
FAX (541)383-1408

October 17, 1997

Mr. Steve Lyon
Ochoco Lumber Company
P.O. Box 668
Prineville, OR 97754
FAX (541) 447-3432

Re: PCB testing; Transformer No. 1035281

Dear Steve:

At your request, on October 14, 1997, ECI collected a sample of oil from an unused electrical transformer stored at your facility. The transformer is identified as General Electric Serial No. 1034281. The transformer was rebuilt on April 28, 1949 by Westinghouse and retained Serial No. 1034281. ECI shipped the oil sample to Oregon Analytical Laboratory (OAL) in Beaverton, Oregon for analysis for polychlorinated biphenyls (PCBs). No PCBs were detected in the sample. A copy of the OAL laboratory report is attached. If you have any questions, please call Bob Shimek or me at (541) 383-1406.

Sincerely,

ENVIRONMENTAL CONSULTING & INVESTIGATION, INC.

John M. Head
Principal

attachment

OAL

L3869

October 16, 1997

John Head
Environmental Consulting & Investigation
Investigation
777 N.W. Wall St.- Suite 306
Bend, OR 97701

Phone: (503) 383-1406
FAX: (503) 383-1408

Re: Laboratory Sample Analysis

Project: Ochoco Lumber

Project Manager: John Head

Dear John Head:

On Wednesday, October 15, 1997, OAL received one (1) transformer oil sample for analysis. The sample was analyzed utilizing EPA or equivalent methodology.

Should you have any questions concerning the results in this report, please contact us at (503) 590-5300. Refer to OAL login number L3869.

Sincerely,

Cindy Hegar
Project Manager

Suzanne LeMay
QA/QC Officer

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road, Beaverton, OR 97007
Phone 503-590-5300 • Fax 503-590-1404

OAL

L3869

Sample Summary

Sample ID	Lab #	Matrix	Sampled	Received
OCHOCO #4	L3869-1	transformer oil	10/14/97	10/15/97

Definition of Terms

ND Analytical result was below the reporting limit.

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road, Beaverton, OR 97007
Phone 503-590-5300 • Fax 503-590-1404

OAL

L3869

Client: *Environmental Consulting & Inve*
Contact: *John Head*

Project: *Ochoco Lumber*

Polychlorinated Biphenyl (PCB)

by EPA 3580/8081

Sample ID	*Matrix*					*Lab Number*
Analyte		Result	Reporting Limit	Units (ppm)	Comment	
					Sampled: *10/14/97*	
					Extracted: *10/15/97*	
OCHOCO #4; TRANS#:1034281	*Transformer Oil*				Analyzed: *10/15/97*	*L3869-1*
Total PCB in Transformer Oil		ND	1.	mg/kg		

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road, Beaverton, OR 97007
Phone 503-590-5300 • Fax 503-590-1404

Environmental Consulting & Investigation ECI

CHAIN OF CUSTODY RECORD

DATE: 14 October 1997

Project Manager: John Head
Company Name: ECI
Address: 777 NW Wall, Suite 306
City, State, ZIP: Bend OR 97701
Phone: (541) 383-1406
FAX: (541) 383-1409

P.O. # or Project Number:
Project Name: Ochoco Lumber
Project Location: Prineville OR ~~97701~~

Lab Project Number

Lab Location

RUSH? YES NO

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
L3869-1	Ochoco #4, Transformer #1034281	Oil	PCB

Additional Analyses:

Requested By:

Date:

Relinquished By	Date/Time	Received By	Date/Time
John M Head	10/14/97 4:00PM	[illegible]	10/15/97 0900
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

Environmental Consulting & Investigation ECI

777 N.W. Wall St.
Suite 306
Bend, Oregon 97701
(541)383-1406
FAX (541)383-1408

November 10, 1997

Mr. Steve Lyon
Ochoco Lumber Company
P.O. Box 668
Prineville, OR 97754
FAX (541) 447-3432

Re: Soil Sampling and Analysis; Used Oil Storage Area

Dear Steve:

At your request, on October 14, 1997, ECI collected a sample of heavily stained surface oil surrounding drums of used oil stored at the Ochoco Lumber Company sawmill in Prineville, Oregon. The purpose for sampling was to determine if the soil would be considered a hazardous waste when excavated during soil cleanup and to provide data to accompany the soil when transported off-site for appropriate disposal. The sample represented the visibly "worst case" conditions observed surrounding the drums.

ECI shipped the sample to AMTEST Oregon, L.L.C. (AMTEST) in Beaverton, Oregon under appropriate chain-of-custody for analysis. The sample was analyzed for aromatic and chlorinated volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), eight heavy metals using the EPA Toxicity Characteristic Leachate Procedure (TCLP), and total petroleum hydrocarbons. A copy of the AMTEST laboratory report is attached.

Table 1

Parameter	Sample Concentration	Hazardous Waste Limit
Ethylbenzene	0.18 mg/kg	NA
Xylenes	0.54 mg/kg	NA
Other aromatic VOCs	ND	varies
Halogenated VOCs	ND	varies
PCBs	ND	NA
TCLP Cadmium	ND	1.0 mg/l
TCLP Chromium	ND	5.0 mg/l
TCLP Lead	ND	5.0 mg/l
Total Petroleum Hydrocarbons (identified as diesel and heavy oil)	120,000 mg/kg	NA

ND = none detected
NA = not applicable
mg/kg = milligrams per kilogram
mg/l = milligrams per liter

Based on the laboratory results, the soil is not a hazardous waste and, when excavated, can be disposed as petroleum contaminated soil. The Crook County landfill is authorized to accept up to 750 tons of petroleum contaminated soil per year. Bruce Ricks, of Crook County Landfill, told ECI they are very close to the limit for 1997, but DEQ has allowed them to "borrow" against next years quota, if necessary. ECI can schedule soil cleanup oversight at your convenience. If you have any questions, please call Bob Shimek or me at (541) 383-1406.

Sincerely,

ENVIRONMENTAL CONSULTING & INVESTIGATION, INC.

John M. Head
Principal

attachment

ANALYSIS REPORT

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

CLIENT
John Head
Environmental Consulting & Investigation
777 NW Wall Street, Suite 306
Bend OR 97701

Date Received: 10/15/97
Date Analyzed: 10/15/97
Date Reported: 10/17/97
Job Number: 28801

Analysis - EPA Method 8010 & 8020 - Volatiles

Project - Ochoco Lumber Co.
Sample Type - Soil

Laboratory Sample Number	28801	Lab	Detection
Client Identification	OCH-1	Blank	Limit
Compound	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)
Benzene	ND	ND	0.1
Toluene	ND	ND	0.1
Ethylbenzene	0.18	ND	0.1
Total Xylenes	0.54	ND	0.1
1,1-Dichloroethene	ND	ND	0.30
Dichloromethane	ND	ND	2.0
trans-1,2-Dichloroethene	ND	ND	0.1
1,1-Dichloroethane	ND	ND	0.1
cis-1,2-Dichloroethene	ND	ND	0.1
Chloroform	ND	ND	0.1
1,1,1-Trichloroethane	ND	ND	0.1
Carbon tetrachloride	ND	ND	0.1
1,2-Dichloroethane (EDC)	ND	ND	0.1
Trichloroethene	ND	ND	0.1
1,2-Dichloropropane	ND	ND	0.1
Dichlorobromomethane	ND	ND	0.1
cis-1,3-Dichloropropene	ND	ND	0.1
trans-1,3-Dichloropropene	ND	ND	0.1
1,1,2-Trichloroethane	ND	ND	0.1
Tetrachloroethene	ND	ND	0.1
Chlorodibromomethane	ND	ND	0.20
1,2-Dibromoethane (EDB)	ND	ND	0.1
Chlorobenzene	ND	ND	0.1
Bromoform	ND	ND	0.20
1,1,2,2-Tetrachloroethane	ND	ND	0.1
1,3-Dichlorobenzene	ND	ND	0.1
1,4-Dichlorobenzene	ND	ND	0.1
1,2-Dichlorobenzene	ND	ND	0.1

QC Information:

Surrogate Recovery %	108	87

ND = None Detected

Reported By

QA Check

Greg Bolt
Laboratory Director

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT
John Head
Environmental Consulting & Investigation
777 NW Wall Street, Suite 306
Bend OR 97701

Date Received: 10/15/97
Date Analyzed: 10/21/97
Date Reported: 10/21/97
Job Number: 28801

Analysis - TCLP Metals 3

Project - Ochoco Lumber Co.
Sample Type - Soil

Lab Sample Number	28801	Detection	Digestion	Matrix
Client Identification	OCH-1	Limit	Blank	Spike
Metal	mg/L (ppm)	mg/L (ppm)	mg/L (ppm)	% Recovery
Cadmium	**ND**	0.02	ND	98
Chromium	**ND**	0.01	ND	114
Lead	**ND**	0.02	ND	109

ND = None Detected

Reported By

QA Check

Greg Bolt
Laboratory Director

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
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ANALYSIS REPORT

CLIENT
John Head
Environmental Consulting & Investigation
777 NW Wall Street, Suite 306
Bend OR 97701

Date Received: 10/15/97
Date Analyzed: 10/22/97
Date Reported: 10/23/97
Job Number: 28801
Page: 3

Project - Ochoco Lumber Co.
Sample Type - Soil

Lab Number	Client Identification	Analysis - TPH-HCID Results			
		Gasoline	Diesel	Other *	Surrogates Recovery %
28801	OCH-1	ND	Positive	Positive	MI/MI
Lab Blank	10/22/97	ND	ND	ND	105/113

ND = None Detected
Detection Limits: Gasoline - 20 mg/kg; Diesel - 50 mg/kg; Other* - 100 mg/Kg
*Higher boiling petroleum products
MI = Matrix Interference

Reported By B
QA Check GB
Ecl288h 10/23/97

Greg Bolt
Laboratory Director

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT
John Head
Environmental Consulting & Investigation
777 NW Wall Street, Suite 306
Bend OR 97701

Date Received: 10/15/97
Date Analyzed: 10/27/97
Date Reported: 10/27/97
Job Number: 28801
Page: 1

Project - Ochoco Lumber Co.
Sample Type - Soil

Lab Number	Client Identification	Total Petroleum Hydrocarbons Analysis - TPH 418.1(mod) mg/Kg (ppm)
28801	**OCH-1**	**120000**
Lab Blank	10/27/97	ND

ND = None Detected
Detection Limit = 20 mg/Kg

QC Information: Spike, 73 % Recovery

Reported By _____

QA Check _____

Greg Bolt
Laboratory Director

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

NALYSIS REPORT

CLIENT
John Head
Environmental Consulting & Investigation
777 NW Wall Street, Suite 306
Bend OR 97701

Date Received: 10/15/97
Date Analyzed: 10/28/97
Date Reported: 11/5/97
Job Number: 28801
Page: 1

Analysis - PCBs (EPA Method 8080)

Project - Ochoco Lumber Co.
Sample Type - Soil

Laboratory Sample #	28801	Lab	Detection
Client Identification	OCH-1	Blank	Limit
PCB's	mg/Kg (ppm)	mg/Kg (ppm)	mg/Kg (ppm)
Arochlor 1016	ND	ND	0.5
Arochlor 1221	ND	ND	1.0
Arochlor 1232	ND	ND	0.5
Arochlor 1242	ND	ND	0.5
Arochlor 1248	ND	ND	0.5
Arochlor 1254	ND	ND	0.5
Arochlor 1260	ND	ND	0.5
Surrogate % Recovery	MI	80	

MI = Matrix Interference
ND = None Detected

Reported By

QA Check

Greg Bolt
Laboratory Director

Ecl015pc 11/6/97

AmTest Inc.
Professional Analytical Services
3205 SW Olme... Beaverton, OR 97005
Tel 503 526 7...
Fax 503 643 1...

CHAIN OF CUSTODY RECORD

AMTEST

DATE: 14 October 1997

Project Manager: John Heard
Company Name: ECI
Address: 777 NW Wall, Suite 306
City, State, ZIP: Bend OR 97701
Phone: (541) 383-1406
FAX: (541) 383-1408

P.O. # or Project Number:
Project Name: Ochoco Lumber Co.
Project Location: Prineville OR

Lab Project Number: 28801

Lab Location: R7/S1

RUSH? YES NO

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
28801	OCH-1, surface soil, NW cor shop, 10/14/97	Soil	Quant. HCID (80...
			8010/8020
			TCLP metals (...

Additional Analyses: 418.1 (M) / PCB
Requested By: J.H / J.H
Date: 10/24/97 / 10/27/97

Relinquished By	Date/Time	Received By	Date/Time
John M Heard	10/14/97 4:00PM	[signature]	10/15/97 12:30
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

OAL

L3869

October 16, 1997

John Head
Environmental Consulting & Investigation
Investigation
777 N.W. Wall St.- Suite 306
Bend, OR 97701

Phone: (503) 383-1406
FAX: (503) 383-1408

Re: Laboratory Sample Analysis
Project: Ochoco Lumber
Project Manager: John Head

Dear John Head:

On Wednesday, October 15, 1997, OAL received one (1) transformer oil sample for analysis. The sample was analyzed utilizing EPA or equivalent methodology.

Should you have any questions concerning the results in this report, please contact us at (503) 590-5300. Refer to OAL login number L3869.

Sincerely,

Cindy Hegar
Project Manager

Suzanne LeMay
QA/QC Officer

OAL

L3869

Sample Summary

Sample ID	Lab #	Matrix	Sampled	Received
OCHOCO #4	L3869-1	transformer oil	10/14/97	10/15/97

Definition of Terms

ND Analytical result was below the reporting limit.

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road, Beaverton, OR 97007
Phone 503-590-5300 • Fax 503-590-1404

Client: *Environmental Consulting & Inve*

Contact: *John Head*

Project: *Ochoco Lumb*

Polychlorinated Biphenyl (PCB)

by EPA 3580/8081

Sample ID	*Matrix*					*Lab Nu*
Analyte		Result	Reporting Limit	Units (ppm)	Comment	
					Sampled: *10/14/97*	
					Extracted: *10/15/97*	
OCHOCO #4; TRANS#:1034281	*Transformer Oil*				Analyzed: *10/15/97*	*L38*
Total PCB in Transformer Oil		ND	1.	mg/kg		

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road, Beaverton, OR 97007
Phone 503-590-5300 • Fax 503-590-1404

Environmental Consulting & Investigation

CHAIN OF CUSTODY RECORD

DATE: 14 October 1997

Project Manager: John Head
Company Name: ECI
Address: 777 NW Wall, Suite 306
City, State, ZIP: Bend OR 97701
Phone: (541) 383-1406
FAX: (541) 383-1408

Lab Project Number:

P.O. # or Project Number:
Project Name: Ochoco Lumber
Project Location: Prineville OR ~~97701~~

Lab Location:

RUSH? YES NO

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
3869-1	Ochoco #4 · Transformer #1034281	Oil	PCB

Additional Analyses:

Requested By:

Date:

Relinquished By	Date/Time	Received By	Date/Time
John M Head	10/14/97 4:00PM	[illegible]	10/15/97 0900
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

Environmental Consulting & Investigation ECI

777 N.W. Wall St.
Suite 306
Bend, Oregon 97701
(541)383-1406
FAX (541)383-1408

February 19, 1998

Mr. Steve Lyon
Ochoco Lumber Company
P.O. Box 668
Prineville, OR 97754
FAX (541) 447-3432

Re: Soil Cleanup Documentation; Ochoco Lumber Company; Used Oil Storage Area; Transformer Storage Area; Boneyard Area

Dear Steve:

On January 14, 1998, Environmental Consulting & Investigation, Inc. (ECI) performed cleanup oversight for removal of petroleum contaminated soil (PCS) at three locations at the Ochoco Lumber Company (Ochoco) sawmill in Prineville, Oregon (the Ochoco Site). ECI collected soil cleanup verification samples following cleanup. During a hazardous waste inspection of the Ochoco Site on July 29 and 30, 1997, representatives of the Oregon Department of Environmental Quality (DEQ) identified the three areas as: 1) the used oil storage area near the northwest corner of the electric shop building; 2) beneath three electrical transformers near the east boundary of the Ochoco Site; and 3) a portion of the boneyard area at the east end of the south log deck. All three areas of soil contamination were due to surface spills of petroleum products. The location of the Ochoco Site is shown on the attached Figure 1. Soil cleanup areas are shown on Figure 2.

On October 18, 1995 and October 14, 1997, ECI collected samples of dielectric fluid from a total of four electrical transformers stored on the ground surface near the east boundary of the Ochoco Site. The samples were analyzed for the presence of polychlorinated biphenyls (PCBs). None were detected. Results were documented in letters from ECI to Ochoco dated October 31, 1995 and October 17, 1997. A copy of each letter is attached. On October 14, 1997, ECI collected a sample of the heavily stained soil from the used oil storage area. The sample was analyzed for the presence of total petroleum hydrocarbons (TPH), PCBs, leachable heavy metals, and chlorinated and aromatic volatile organic compounds (VOC). The petroleum contaminants were identified as diesel and heavy oils. No PCBs were detected in the sample. Results of VOC and leachable metals analysis indicated the contaminated soil was not a hazardous waste. Results were documented in a November 10, 1997 letter from ECI to Ochoco. A copy of the letter is attached.

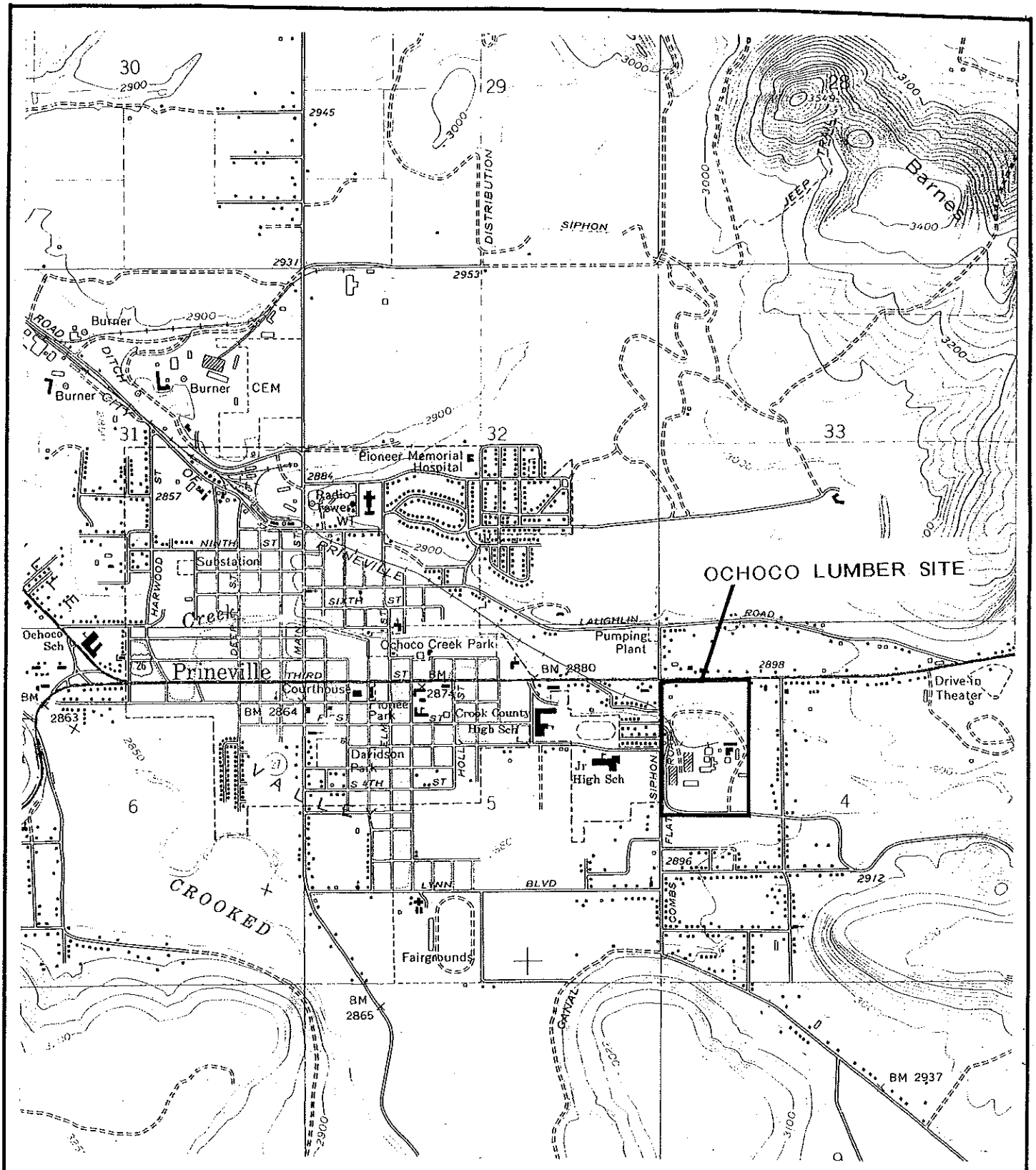
Ochoco performed the soil cleanup using Ochoco personnel and equipment. Visibly contaminated soil was excavated using a backhoe, placed in dump trucks, and hauled to the Crook County Landfill for disposal as PCS. Bledsoe's Excavating, Inc. transported the PCS to the landfill. A total of 56.29 tons of PCS was excavated and disposed. A copy of the landfill disposal receipts is attached. Following receipt of analytical results, Ochoco backfilled the soil cleanup excavations with clean soil and crushed rock.

All cleanup verification samples were collected by transferring soil from the bottom of the cleanup excavation(s) to clean glass jars with teflon-lined lids using a new wooden tongue depressor at each sample location. Samples were placed in an ice chest on ice and shipped to AMTEST Oregon, LLC in Beaverton, Oregon (AMTEST) for analysis. All samples were analyzed using the NW TPH-Dex method specified to quantify the petroleum hydrocarbons in the samples. Analytical results are summarized in Table 1. A copy of the AMTEST laboratory report is attached.

On January 14, 1998, Ochoco moved the transformers and excavated the visibly stained soil from the transformer location. The resulting excavation was approximately ten by 12 feet and a maximum of 18 inches deep. Soil was light brown silty fine sand. Following excavation, ECI collected two soil samples from the bottom of the excavated area. No petroleum hydrocarbons were detected in the samples. Soil sample locations are shown on Figure 3.

On January 14, 1998, Ochoco excavated visibly contaminated soil from the former used oil storage area adjacent to the northwest corner of the building that houses the electric shop. The ground surface is covered with crushed rock to a depth of approximately 18 inches. Soil beneath the crushed rock is dark brown sandy silt. The soil removal excavation measured approximately 16 by 22 feet and was 30 to 40 inches in depth. ECI collected four cleanup verification samples from the bottom of the excavation. Soil sample locations are shown on Figure 4. No TPH was detected in one of the samples. TPH concentration in the other three samples ranged from 200 to 247 milligrams per kilogram (mg/kg). Because TPH was detected in the samples, ECI instructed AMTEST to analyzed sample OC-ES-5, the sample with the highest reported TPH concentration, for polyaromatic hydrocarbons (PAHs), the hazardous constituents of diesel and oil. No PAHs were reported in the sample. The samples were not analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) because BTEX levels reported for aromatic VOC analysis of the sample of heavily contaminated soil collected from this area on October 14, 1997 did not exceed appropriate soil cleanup levels. Benzene and toluene were not detected in the sample. Ethylbenzene was reported at 0.18 mg/kg and xylenes were reported at 0.56 mg/kg in the heavily contaminated sample. Soil cleanup levels, as provided in the Oregon Soil Cleanup Table in OAR 340-122-045, are 100 mg/kg for ethylbenzene and 800 mg/kg for xylenes. TPH concentration in the October 14, 1997 sample was three orders of magnitude higher than in the cleanup verification samples.

On January 14, 1998, Ochoco excavated visibly contaminated soil from the boneyard area. Before excavation, scrap metal and drums were removed from the area of stained soil. The ground surface in the boneyard area is covered with large crushed rock (three-inch minus) to a depth of approximately one foot. Soil beneath the crushed rock is dark brown sandy silt. The cleanup excavation measured approximately ten by 17 feet and had a maximum depth of 24 inches. No TPH was detected in two cleanup verification samples taken from the bottom of the excavation. Soil sample locations are shown on Figure 3.



VICINITY MAP

FEBRUARY 1998	FIGURE 1	Environmental Consulting & Investigation ECI

Table 1
Data Summary
Soil Cleanup Samples

Sample No.	Location	Depth	Diesel	Fuel Oil	PAH
OC-TR-1	Transformer; NE	18"	ND	ND	NA
OC-TR-2	Transformer; SW	12"	ND	ND	NA
OC-ES-3	Electric shop; SW	3'	220	ND	NA
OC-ES-4	Electric shop; NW	3.5'	ND	ND	NA
OC-ES-5	Electric shop; NE	3.5'	247	ND	ND
OC-ES-6	Electric shop; SE	3.5'	233	ND	NA
OC-BY-7	Boneyard; North	24"	ND	ND	NA
OC-BY-8	Boneyard; South	20"	ND	ND	NA
Cleanup Level			500	500	varies

ND = None detected
NA = Not analyzed
TPH cleanup level is based on DEQ UST Soil Matrix Cleanup evaluation

Based on the analytical results for cleanup verification samples, it is ECI's opinion that no further remedial action is necessary at the three petroleum contaminated soil areas. If you have any questions, please call Bob Shimek or me at (541) 383-1406.

Sincerely,

ENVIRONMENTAL CONSULTING & INVESTIGATION, INC.

John M. Head
Principal

attachments:
Figure 1 Vicinity Map
Figure 2 Site Map/Aerial Photograph
Figure 3 Soil Sample Location Map (Transformers and Boneyard)
Figure 4 Soil Sample Location Map (Used Oil Storage Area)
AMTEST Laboratory Report
Landfill Disposal Receipts
Photographs
October 31, 1995 Letter
October 17, 1997 Letter
November 17, 1997 Letter

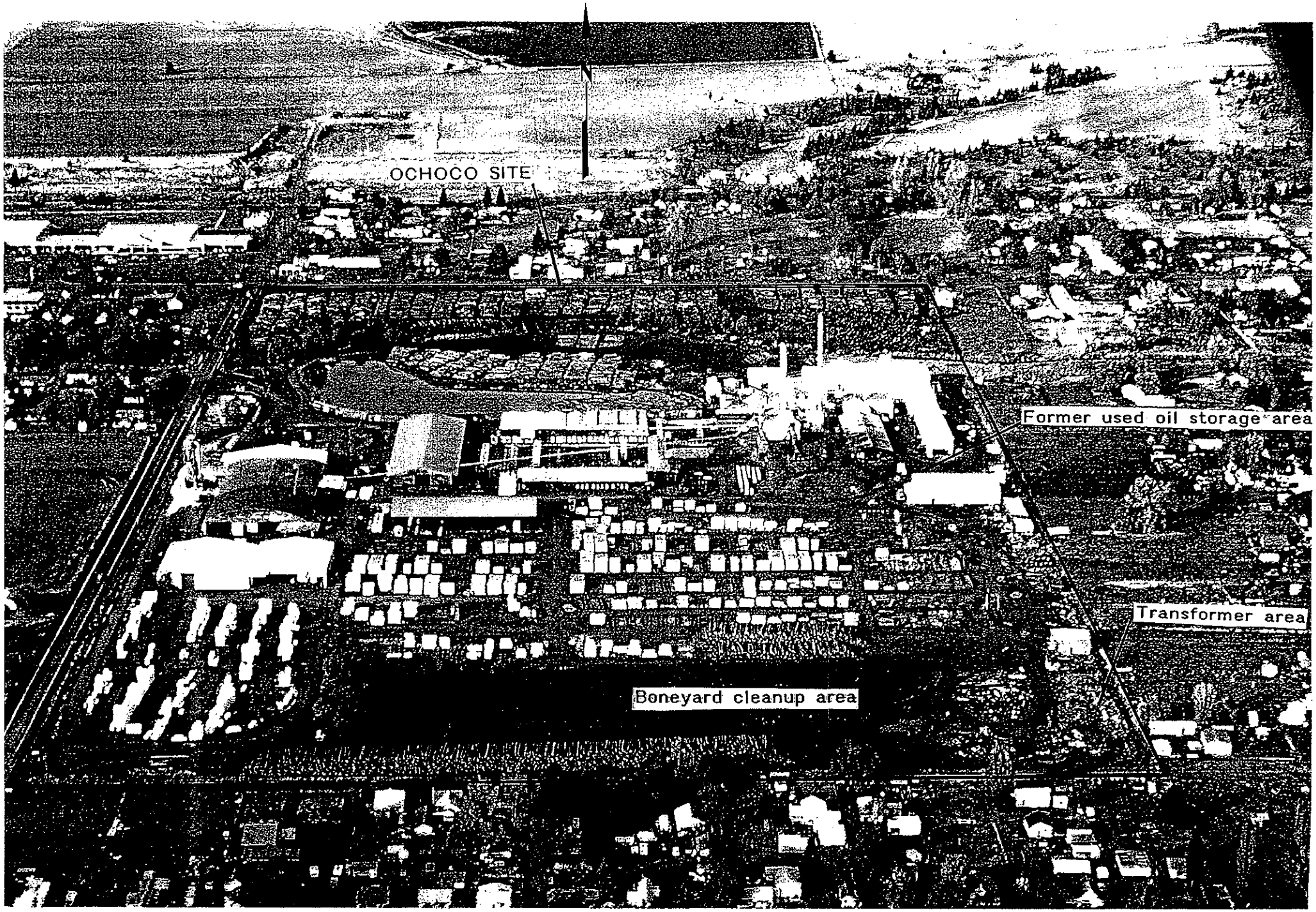
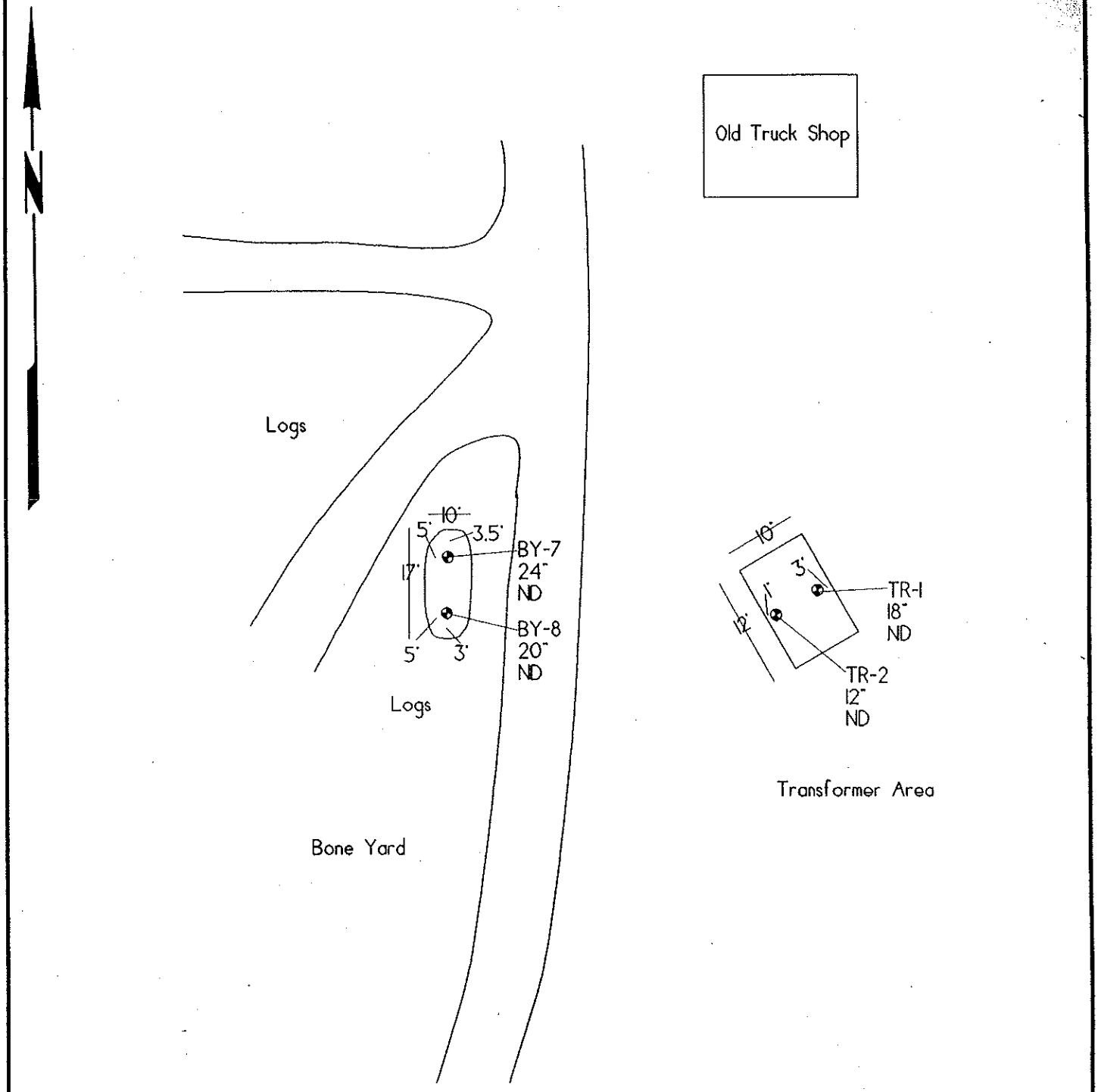


FIGURE 2 SITE MAP

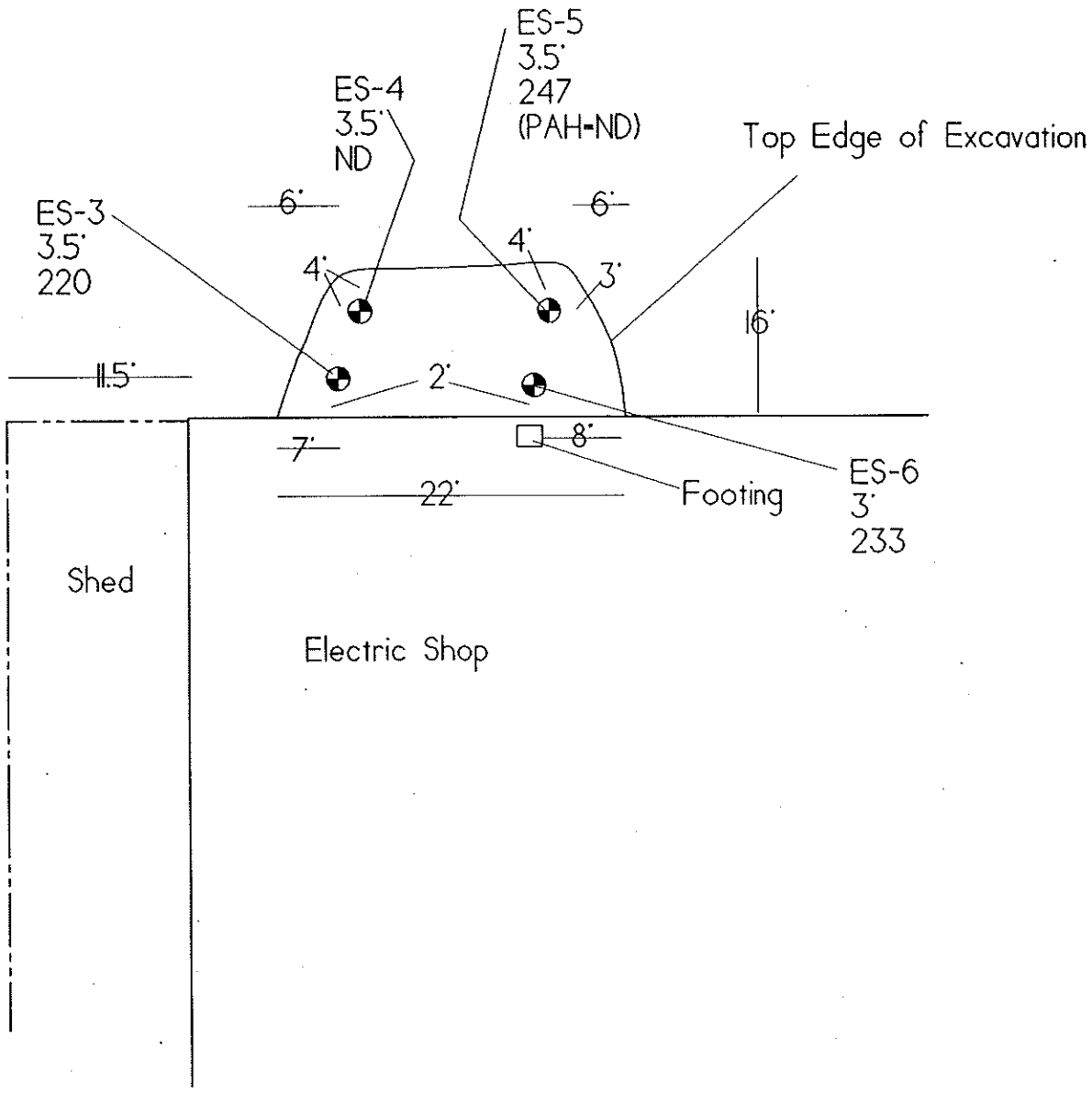
Environmental Consulting & Investigation ECI



Transformer and Bone Yard Area

SOIL SAMPLE LOCATION MAP

FEBRUARY 1998	FIGURE 3	Environmental Consulting & Investigation ECI



Used Oil Storage Area

SOIL SAMPLE LOCATION MAP

FEBRUARY 1998	FIGURE 4	Environmental Consulting & Investigation ECI

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT

John Head
Environmental Consulting & Investigation
777 NW Wall Street, Suite 306
Bend OR 97701

Date Received: 1/15/98
Date Analyzed: 1/22/98
Date Reported: 1/23/98
Job Number: **01503-10**
Page: 1

Project - Ochoco Soil Cleanup

Sample Type - Soil

Lab Number	Client Identification	Analysis - TPH-D Extended mg/Kg (ppm) Diesel	Fuel Oil	Surrogate % Recovery
1503	OC-TR-1	ND	ND	89
1504	OC-TR-2	ND	ND	MI
1505	OC-ES-3	220	ND	MI
1506	OC-ES-4	ND	ND	80
1507	OC-ES-5	247	ND	MI
1508	OC-ES-6	233	ND	MI
1509	OC-BY-7	ND	ND	66
1510	OC-BY-8	ND	ND	103
Lab Blank	1/22/98	ND	ND	70
	Detection Limit:	15	50	

ND = None Detected
MI = Matrix Interference

Reported By B

QA Check GB

Greg Bolt
Laboratory Director

Ecl015dx 1/23/98

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT
John Head
Environmental Consulting & Investigation
777 NW Wall Street, Suite 306
Bend OR 97701

Date Received: 1/15/98
Date Analyzed: 1/30/98
Date Reported: 2/3/98
Job Number: **01503-10**

Analysis - EPA 8270 (PAH's)
Project - Ochoco Soil Cleanup

Sample Type - Soil

Laboratory Sample Number	1507	1507-Dup	Detection	
Client Identification	OC-ES-5'	OC-ES-5'	Limit	Blank
Compound	mg/Kg (ppm)	mg/Kg(ppm)	mg/Kg (ppm)	mg/Kg (ppm)
Naphthalene	ND	ND	0.02	ND
Acenaphthylene	ND	ND	0.02	ND
Acenaphthene	ND	ND	0.02	ND
Fluorene	ND	ND	0.02	ND
Phenanthrene	ND	ND	0.02	ND
Anthracene	ND	ND	0.02	ND
Fluoranthene	ND	ND	0.02	ND
Pyrene	ND	ND	0.02	ND
Benzo(a)Anthracene	ND	ND	0.02	ND
Chrysene	ND	ND	0.02	ND
Benzo(b)Fluoranthene	ND	ND	0.02	ND
Benzo(k)Fluoranthene	ND	ND	0.02	ND
Benzo(a)Pyrene	ND	ND	0.02	ND
Dibenzo(a,h)Anthracene	ND	ND	0.02	ND
Benzo(g,h,i)Perylene	ND	ND	0.02	ND
Indeno(1,2,3-c,d)Pyrene	ND	ND	0.02	ND
Surrogate Recovery %	83	89		102

ND = None Detected

Reported By

QA Check

Ecl015pa 2/3/98

Greg Bolt
Laboratory Director

CHAIN OF CUSTODY RECORD

AMTEST

AmTest Inc.
Professional Analytical Services
3205 SW Nimbus Ave
Beaverton, OR 97005
Tel 503 626 7424
Fax 503 643 1460

DATE: 14 January 1998

Project Manager: John Head
Company Name: ECI
Address: 777 NW Wall, Suite 306
City, State, ZIP: Bend OR 97701
Phone: (541) 383-1406
FAX: (541) 383-1408

Lab Project Number: 01503 - 10

P.O. # or Project Number:
Project Name: Ochoco Soil Cleanup
Project Location: Prineville, OR

Lab Location: R8/S5

RUSH? YES (NO)

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
01503	OC-TR-1; 11/14/98; transformer storage	Soil	TPH ~~418.1~~ DX
01504	OC-TR-2; 11/14/98; transformer storage		
01505	OC-ES-3; 11/14/98; electric shop SW		
01506	OC-ES-4; 11/14/98; electric shop NW		
01507	OC-ES-5; 11/14/98; electric shop NE		
01508	OC-ES-6; 11/14/98; electric shop SE		
01509	OC-BY-7; 11/14/98; Boneyard north		
01510	OC-BY-8; 11/14/98; Boneyard south		

Additional Analyses: -> TPH-DX
Requested By: as discussed with J.H. @ 59.
Date: 1/15/97

1507 - PAH
JH.
1/23/98

Relinquished By	Date/Time	Received By	Date/Time
Ron Head	1/14/98; 4:30 PM	J. Vian	1/15/98
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

CROOK COUNTY LANDFILL

5601 SW Houston Lake Rd.
Prineville, OR 97754
447-2398

#1

ID. NO. 86

GROSS 36440 LB STORED

01/14/98 10:17 AM

ID. NO. 86

GROSS 36440 LB RECALLED
TARE 21480 LB
NET 14960 LB

01/14/98 10:28 AM

$ 26.10
DUE

MINIMUM

Ochoco Lbr Co

Duane Bledsoe

№ 54086

CROOK COUNTY LANDFILL

5601 SW Houston Lake Rd.
Prineville, OR 97754
447-2398

#2

ID. NO. 87

GROSS 45720 LB STORED

01/14/98 11:19 AM

ID. NO. 87

GROSS 45720 LB RECALLED
TARE 21460 LB
NET 24260 LB

01/14/98 11:26 AM

$ 42.45
DUE

MINIMUM

Ochoco Lumber

D. Bledsoe

№ 54087

CROOK COUNTY LANDFILL

5601 SW Houston Lake Rd.
Prineville, OR 97754
447-2398

#3

ID. NO. 92

GROSS 46800 LB STORED

01/14/98 12:28 PM

ID. NO. 92

GROSS 46800 LB RECALLED
TARE 21440 LB
NET 25360 LB

01/14/98 12:37 PM

$ 44.38
DUE

MINIMUM

Ochoco Lumber

D. Bledsoe

№ 54092

CROOK COUNTY LANDFILL

5601 SW Houston Lake Rd.
Prineville, OR 97754
447-2398

#4

ID. NO. 97

GROSS 45100 LB STORED

01/14/98 01:23 PM

Ochoco Lumber

N. Bledsoe

№ 54099

CROOK COUNTY LANDFILL

5601 SW Houston Lake Rd.
Prineville, OR 97754
447-2398

#5

ID. NO. 99

GROSS 45780 LB STORED

01/14/98 02:20 PM

ID. NO. 99

GROSS 45780 LB RECALLED
TARE 21440 LB
NET 24340 LB

01/14/98 02:28 PM

$ 42.59
DUE

MINIMUM

Ochoco Lumber

D. Bledsoe

№ 54097

Environmental Consulting & Investigation ECI

745 N.W. Wall St.
Suite 306
Bend, Oregon 97701
(503)383-1406
FAX (503)383-1408

October 31, 1995

Joyce Capehart
Ochoco Lumber Company
PO Box 668
Prineville, OR 97754

RE: Results of PCB analysis on Transformer Oil

Dear Joyce,

Enclosed are the analytical results and Chain of Custody form for PCB analysis on oil from the three electrical transformers located on the Prineville Ochoco Lumber Company plant site south of the electric shop. No PCBs were detected in the samples.

Each sample was collected using a new disposable bulb pipette provided by Oregon Analytical Laboratory (OAL). The samples were taken from the top of the transformers after you removed the lids. Each sample was placed in a labeled PCB vial provided by OAL and mailed to OAL in Beaverton, Oregon for analysis. The sample designations on the Chain of Custody and data sheet are as follows: CT-01=center transformer, NT-02=northerly transformer, ST-03=southerly transformer.

If you have any questions please call John Head or me at 1-800-822-0616or 383-1406.

Sincerely

ENVIRONMENTAL CONSULTING & INVESTIGATION, INC.

Robert E. Shimek
Principal

enclosures

OAL

PCB OIL TEST REPORT

ENVIRONMENTAL CONSULTING &
INVESTIGATION
745 N.W. WALL ST.- SUITE 306
BEND, OR 97701
BOB SHIMEK
383-1406 FAX 383-1408
OCHOCO

ANALYST REVIEW BY: WB DATE: 10-25-95

DATA PACK REVIEW BY: DM DATE: 10/25/95

OAL SAMPLE NO. 60-J296-	TRANSFORMER NO. OR SAMPLE IDENTIFICATION	PCB UG/G	EPA CLASSIFICATION
87563	CT-01	ND	NON-PCB
87564	NT-02	ND	NON-PCB
87565	ST-03	ND	NON-PCB

ND = NONE DETECTED (<0.5 UG/G)

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric
14855 S.W. Old Scholls Ferry Road
Beaverton, OR 97007
Phone 503-590-5300 • Fax 503-590-1404

OAL Oregon Analytical Laboratory
14855 S.W. Old Scholls Ferry Rd.
Beaverton, Oregon 97007
(503) 590-5300
FAX (503) 590-1404

CHAIN OF CUSTODY RECORD
LABORATORY ANALYSIS REQUEST

Page 1 of 1

Client Information

Company: ECI
Contact: Bob Shimek
Address: 777 NW Wall St
Bend OR 97701
Phone #: (503) 383-1406 FAX #: 383-1408

Project Name: Ochoco Lumber
Project Number: TRANS-01
P.O. Number: Ochoco
Comments:

Sampler's Name: Robert Shimek
Signature: Robert Ell - t
Sampling Date: 10-18-95

Provide Verbal Results ☐ Yes ☒ No
Provide FAX Results ☒ Yes ☐ No

	Sample Identification	Date	Time	OAL #	# of Containers	Matrix: Soil	Matrix: Water	Matrix: Other (Note in Remarks)	Analyses: All PCB Pesticide (circle)	Turnaround	Remarks
1	C-T-0.1	10/18	1435	60 87565 42385	1				✓		0.1
2	N-T-0.2	10/18	1435	87565 42389	1				✓		0.1
3	S-T-0.3	10/18	1435	42390 87565	1				✓		0.1
4											
5											
6											
7											
8											
9											
10											

Analyses: Volatiles 624/8260 (circle) All Aromatic Halogenated; Semivolatiles 625/8270 (circle) All PAH(SIM) Phenol Phthalate; Chlorinated Herbicides 8150; TPH-HCID OR-DEQ Quantify? Yes No; TPH Quantification (circle) G D 418.1M 418.1; BTEX 602/8020; TCLP Metals (circle) As Ba Cd Cr Pb Hg Se Ag; TCLP Organics (circle) Vol Semivol Pest Herb; Metals ☐Dissolved ☐Total; Est

Turnaround: N - 2 weeks; S - 1 week; R - Rush; O - Other

Remarks

Relinquished	Received
Signature: Robert Ell - t	Signature: Gale Grams
Print Name: Robert E Shimek	Print Name: Gale Grams
Company: ECI	Company: OAL
Date: 10-19-95	Date: 10 23 95
Time:	Time:

Relinquished	Received
Signature:	Signature:
Print Name:	Print Name:
Company:	Company:
Date:	Date:
Time:	Time:

Shipped Via: UPS (Mail)
Received @: RT °C
Appropriate Containers ☒ Yes ☐ No

_____ 4oz./8oz. Jars
_____ VOA Vials
_____ Plastic Bottles
_____ Glass Bottles
X other: PCB vials

SITE PHOTOGRAPHS
Ochoco Lumber Company
Soil Cleanup

PHOTO #1 View of the transformer soil cleanup area from the south. The soil cleanup excavation is in the center of the photo.

PHOTO #2 Close-up view of the transformer soil cleanup excavation from the south. Sample jars are visible at the soil sample locations.

PHOTO #3 View of the partially completed soil cleanup excavation in the boneyard area from the north.

PHOTO #4 Excavation in progress at the boneyard area. Photo taken from the north.

PHOTO #5 View of the final boneyard area excavation from the north. Sample jars are visible at the soil sample locations.

PHOTO #6 View of the boneyard area from the north. Loading of a dump truck with soil excavated from the boneyard is in the left background.

PHOTO #7 View of the partially completed soil cleanup excavation in the former used oil storage area from the east. The electric shop building is at the left.

PHOTO #8 View of the completed soil cleanup excavation in the former used oil storage area from the north. Sample jars are visible at the soil sample locations. The electric shop building is at the top of the photo.

PHOTO #9 View of the completed soil cleanup excavation in the former used oil storage area from the west. Sample jars are visible at the soil sample locations. The electric shop building is at the right edge of the photo.

PHOTO #10 Loading of a dump truck with soil excavated from the former used oil storage area. Temporarily piles excavated soil is in the foreground.

PHOTO #11 More distant view of the excavated former used oil storage area from the east. The piles of soil adjacent to the electric shop building were excavated from the former used oil storage area.

PHOTO #1

PHOTO #2

PHOTO #3

PHOTO #4

PHOTO #5

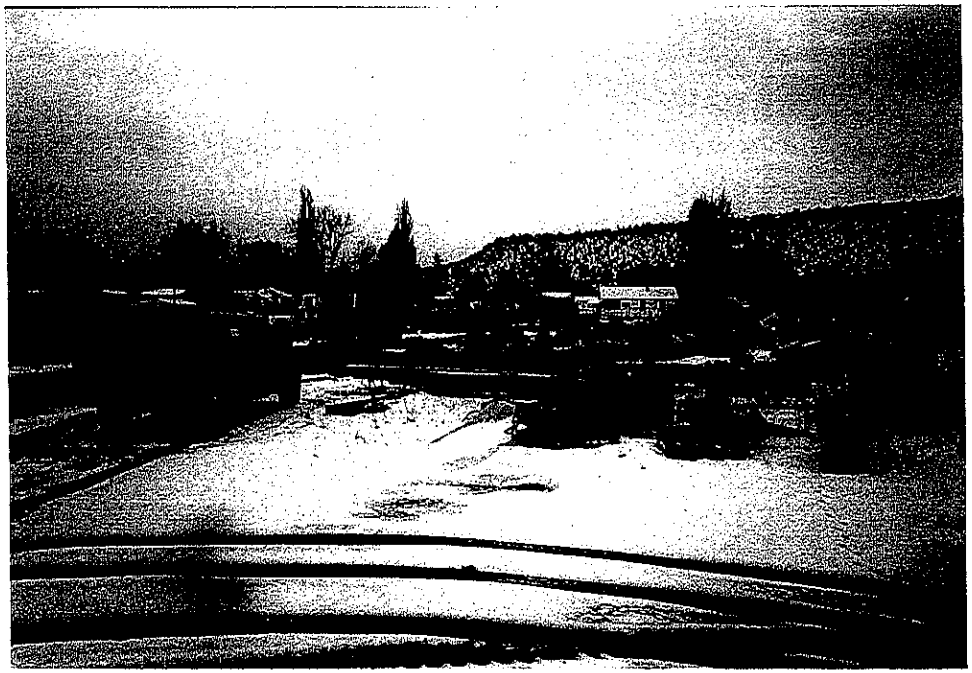


PHOTO #6

PHOTO #7

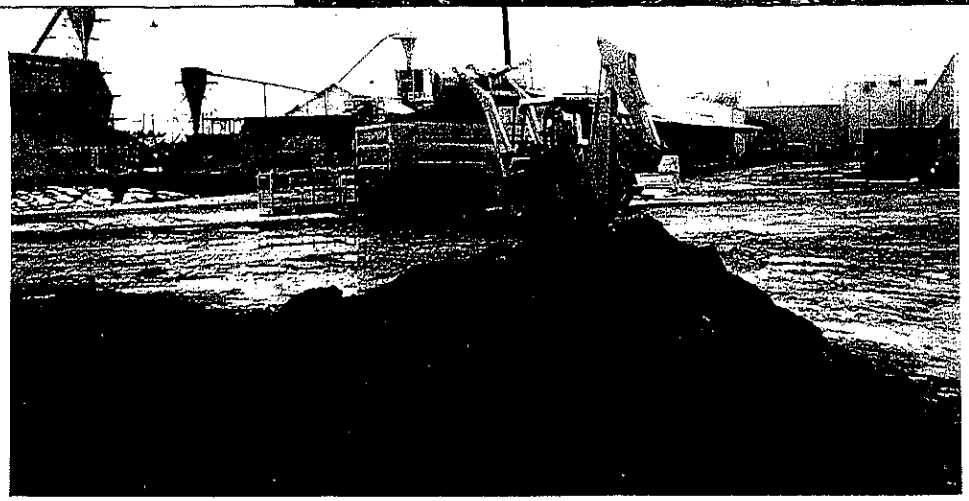


PHOTO #10

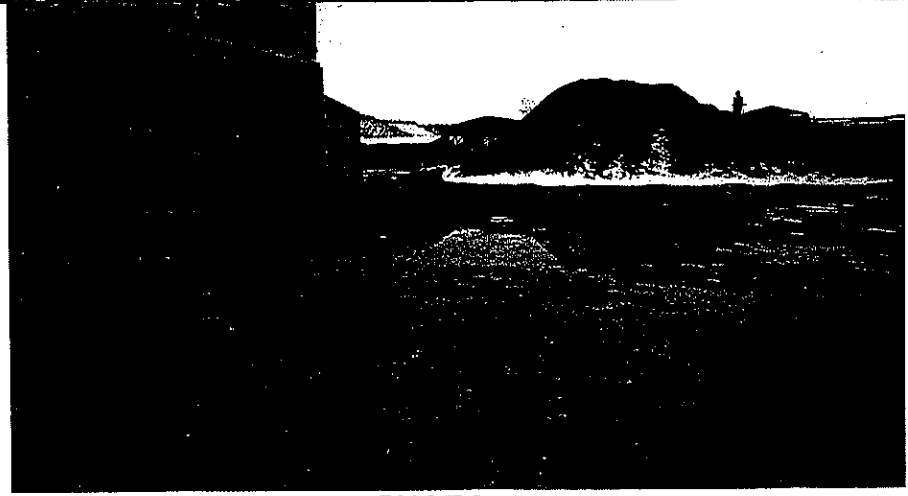


PHOTO #11

Ochoco Lumber Company

Manufacturers of Ponderosa Pine
P.O. Box 668 • Prineville, Oregon 97754
(541) 447-6296

January 9, 1998

DEQ Rules Coordinator
Office of the Director
811 SW Sixth Avenue
Portland, OR 97204

RE: Notice of Assessment of Civil Penalty
Case No. WMC/HW-ER-97-219
Crook County

To whom it may concern;

Ochoco Lumber Company would like to request a hearing in regards to the above referenced citation. Specifically, we are contesting Violation No. 2 in Section II in the notice.

There are three separate spills identified in Violation No. 2. These problems were initially identified during the inspection on July 29-30. We were not instructed to immediately clean up those areas. Our understanding from the compliance officer was that "upon detection of a spill or release, (we are to) immediately stop the release, clean up the spill and manage the contaminated media and debris in compliance with applicable solid waste or hazardous waste rules". That is the course of action we have taken.

I dispute the image put forth in the citation that we have done nothing about the problems identified during the inspection. To date we have:

1) purchased and installed a waste oil burner
2) disposed of solid waste in our bone yard
3) had the transformers tested for PCB's (no PCB's)
4) had the contaminated soil tested for hazardous substances (not hazardous waste)
5) disposed of asbestos material that was located during the inspection
6) participated in a DEQ hearing over asbestos citation
7) had the unlabeled oil drums tested (waste oil)
8) located a scrap dealer who will dispose of the old transformers
9) changed the lines of responsibility and accountability within the plant site for environmental issues
10) Disposed of the three used batteries that were located during the inspection.

Ochoco Lumber Company has invested a great deal of time and money into correcting the problems identified during the inspections. We are proud of the progress we have made in becoming more knowledgeable and responsible in regards to the issues dealt with during the inspections. I feel that a $6,000 fine is outrageous and accomplishes nothing other than belittling the progress we have made.

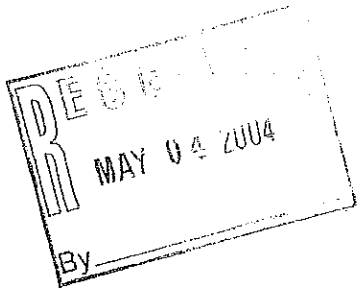
I am looking forward to discussing the inspection and this citation in greater detail at our upcoming hearing.

Sincerely,

Steve Lyon, Human Resource Manager

Environmental Consulting & Investigation ECI

777 N.W. Wall St.
Suite 306
Bend, Oregon 97701
(541)383-1406
FAX (541)383-1408



FAX Transmittal

TO: Ken Walter

FAX NUMBER: 447-8992

FROM: Bob Shimek

DATE: April 28, 1998

TIME: 7:48am

NUMBER OF PAGES: 8 including cover sheet

MESSAGE: Ken-here is information you need to finish up the UST decommissioning & cleanup report.

1-Lab data. Make a copy of the Chain of Custody form and all three pages of data report to accompany the dirt pile to the landfill. Call the landfill 24 hrs in advance to let them know you are coming. You will also need copies of the Chain of Custody and lab data for the DEQ report for your files.

2-Matrix Score Sheet.
You need to submit this with the DEQ cleanup documentation.

3-Matrix Checklist.
You need to submit this with the DEQ cleanup documentation BUT you need to complete items 4 and 10 first. I've enclosed a sketch of the sample locations. Add this information to a hand drawn sketch or other map of the mill site that you have where you can show the location of the USTs and excavation.

You should have the remainder of the forms you need to fill out. If you have any questions, give John Head or me a call.

472-8992

CHAIN OF CUSTODY RECORD

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

Date Received:

Project Manager: 4-8-98
Company Name: Environmental Consulting & Investigation
Address: 777 N.W. Wall St., Suite 306
City, State, ZIP: Bend OR 97701
Phone: 541-383-1406
FAX: 541-383-1408

P.O. # or Project #:
Project Name: Ochoco Lumber USTs
Project Location: Prineville
Sampling Date: 4-8-98

Lab Project Number: 9901-5
Lab Location: R5-52
RUSH? YES (NO)

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE MATRIX	ANALYSIS REQUIRED
9901	OL-1 Soil Pile	Soil	HcID*
9902	OL-2 NE 10'		
9903	OL-3 SE 11'		
9904	OL-4 SC 11'6"		
9905	OL-5 NW 10'		

LAB USE ONLY

Additional Analyses: * Cal Lf + G/DX - all positives
Requested By: B.S.
Date: 4/15/98

Relinquished By	Date/Time	Received By	Date/Time
[signature]	4-8-98	G. Bolt	4/9/98 12:10
Relinquished By	Date/Time	Received By	Date/Time
Relinquished By	Date/Time	Received By	Date/Time

Chain2 2/2/98

ANALYSIS REPORT

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

Bob Shimek
Environmental Consulting & Investigation
777 NW Wall Street, Suite 306
Bend OR 97701

Date Received: 4/9/98
Date Analyzed: 4/11/98
Date Reported: 4/15/98
Job Number: 9901-5
Page: 1

Project - Ochoco Lumber UST's
Sample Type - Soil

Lab Number	Client Identification	Analysis - TPH-HCID Results			
		Gasoline	Diesel	Other *	Surrogates Recovery %
9901	OL-1	Positive	Positive	ND	85/90
9902	OL-2	ND	ND	ND	94/138
9903	OL-3	ND	ND	ND	97/137
9904	OL-4	Positive	ND	ND	103/70
9905	OL-5	ND	ND	ND	108/72
9905 Dup	OL-5	ND	ND	ND	101/67
Lab Blank	4/11/98	ND	ND	ND	91/68

ND = None Detected
Detection Limits: Gasoline - 20 mg/kg; Diesel - 50 mg/kg; Other* - 100 mg/Kg
*Higher boiling petroleum products

Reported By _____

QA Check _____

Greg Bolt
Laboratory Director

Bob9901 4/15/98

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

ANALYSIS REPORT

CLIENT

Bob Shimek
Environmental Consulting & Investigation
777 NW Wall Street, Suite 306
Bend OR 97701

Date Received: 4/9/98
Date Analyzed: 4/20/98
Date Reported: 4/23/98
Job Number: 9901-5
Page: 2

Project - Ochoco Lumber UST's

Sample Type - Soil

Lab Number	Client Identification	Analysis - TPH-D Extended mg/Kg (ppm)*		
		Diesel	Heavy Oil	Surrogate % Recovery
9901	OL-1	180	ND	68
Lab Blank	4/20/98	ND	ND	80
	Detection Limit:	15	50	

ND = None Detected
*Dry Weight Basis

Reported By _____

QA Check _____

Greg Bolt
Laboratory Director

ANALYSIS REPORT

AMTEST OREGON L.L.C.
Professional Laboratory Services
9205 S.W. Nimbus Ave.
Beaverton, OR 97008
Tel 503 626 7424
Fax 503 643 1460

CLIENT

Bob Shimek
Environmental Consulting & Investigation
777 NW Wall Street, Suite 306
Bend OR 97701

Date Received: 4/9/98
Date Analyzed: 4/23/98
Date Reported: 4/24/98
Job Number: 9901-5
Page: 3

Project - Ochoco Lumber UST's
Sample Type - Soil

Lab Number	Client Identification	Analysis - TPH-G Results mg/kg (ppm) Gasoline	Surrogate % Recovery
9901	OL-1	113	MI
9904	OL-4	37	64
Lab Blank	4/23/98	ND	95

ND = None Detected
Detection Limit - 5 mg/kg
MI = Matrix Interference

Reported By _____

QA Check _____ GB

Greg Bolt
Laboratory Director

Ecl100-g 4/24/98

MATRIX SCORE SHEET

1. Depth to Groundwater		10
< 25 feet	(10)	
25 - 50 feet	(7)	
51 - 100 feet	(4)	
> 100 feet	(1)	
2. Mean Annual Precipitation		1
>45 inches	(10)	
20 - 45 inches	(5)	
<20 inches	(1)	
3. Native Soil Type		5
Coarse sands, gravels	(10)	
Silts, fine sands	(5)	
Clays	(1)	
4. Sensitivity of Uppermost Aquifer		7
Sole Source	(10)	
Current Potable	(7)	
Future Potable	(4)	
Non-potable	(1)	
5. Potential Receptors		10
Many, near	(10)	
Medium	(5)	
Few, far	(1)	
TOTAL SCORE	=	33

Matrix Score	Cleanup Level in ppm TPH	
	Gasoline	Diesel
Level 1: > 40 pts.	40	100
Level 2: 25 - 40 pts.	80	500
Level 3: < 25 pts.	130	1000

MATRIX CHECKLIST

X 1. The release of petroleum has been reported to the Department of Environmental Quality (220).

X 2. The Matrix Score Sheet has been completed for this site, unless the site is cleaned up to the most stringent cleanup level (320).

X 3. The required hydrocarbon identification test (TPH-HCID) has been performed (335(3)), and, if detectable levels were found, the appropriate analytical method or methods have been used to measure the levels of contamination (350).

____ 4. A sketch has been made of this site (345(1)) which clearly shows:

____ a. The location of all buildings and other key features, both man-made and natural;

____ b. The names of adjacent streets and properties;

____ c. The location of all excavations including those that were for the removal of tanks and associated piping as well as those that were strictly for the removal of contaminated soils;

____ d. The location of all product storage tanks, lines and dispensers, including those that were decommissioned as well as those that remain on the site; and

____ e. All soil and water sample locations.

NA 5. If any contaminated soil in excess of matrix limits has been left on site, the reason for leaving this soil has been explained and the requirements of 355(4) have been met.

NA 6. If water was present in the tank pit, the Department was notified, the water was pumped from the pit, and the requirements of 340(4) have been met.

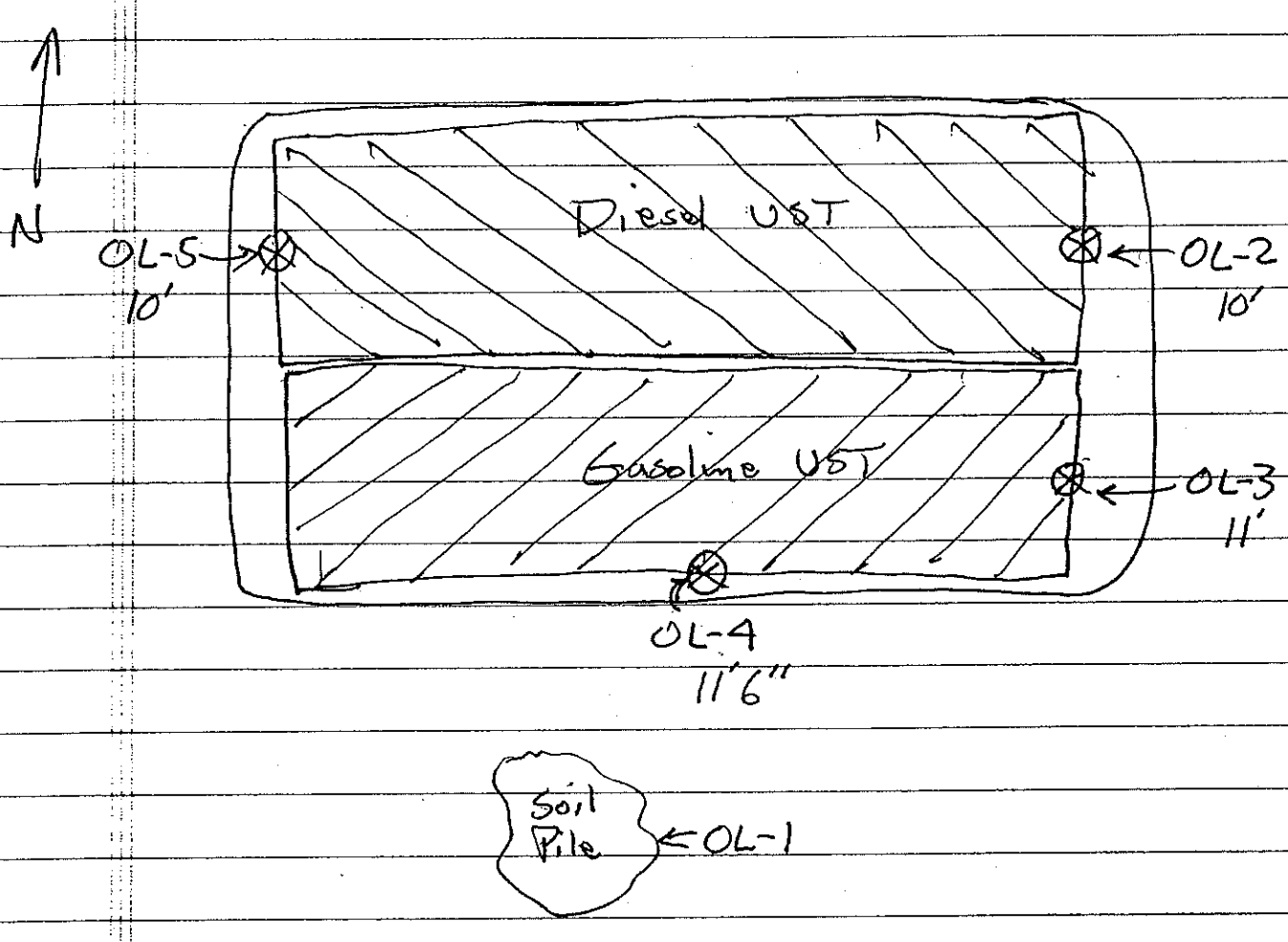
X 7. All soil and/or water samples have been collected, coded, stored and shipped as specified in the rules, and proper chain-of-custody forms have been filled out (345).

NA 8. If a release from a waste oil tank was discovered, at least one sample has been analyzed by the methods specified in 350(5).

NA 9. If a tank was decommissioned in place, the Department gave prior approval for a site-specific sampling plan (340(5)).

____ 10. A report has been prepared which includes a detailed description of everything that was observed and performed at the site, contains all of the information required by the rules (360), and presents findings and recommendations which are consistent with Departmental regulations.

Soil Sample Locations & Depths



INITIAL (TWENTY DAY) REPORT FORM FOR UST CLEANUP PROJECTS

This report is due twenty (20) days from the date of the release.

DEQ File No. 07-98-0019

DEQ Facility ID No. 7188

Site Name: Ochoco Lumber Co.

Site Address: Combs Flat Rd Prineville, OR 97754

INITIAL CLEANUP INFORMATION

(1) Type of contamination (check all that apply):

X Gasoline X Diesel ___ Waste Oil ___ Heating Oil
___ Other (specify) _____

(2) Estimate quantity of release (based on information known to date):
X <100 gal. ___ 100-499 gal. ___ 500-999 gal. ___ 1,000-5,000 gal. ___ >5,000 gal.

SITE INFORMATION

(3) (N) Y Did any water enter the excavation? If yes, please describe and identify the depth to groundwater in feet below ground surface: _____

(4) (N) Y Was a sheen or odor observed on any water in the excavation?

NOTE: IF GROUNDWATER IS ENCOUNTERED, SOIL SAMPLES FROM THE SOIL/WATER INTERFACE MUST BE COLLECTED AND ANALYZED FOR BTEX AND APPROPRIATE TPH METHOD.

AT SITES WHERE DIESEL OR OTHER NON-GASOLINE PRODUCTS HAVE BEEN RELEASED, THE WATER MUST ALSO BE TESTED FOR POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS).

(5) (N) Y Was water pumped from the excavation?
If yes, did groundwater recharge within 24 hours after pumping? N Y
Please describe the pumping procedure and disposal option selected for the purged excavation water:

(6) (N) Y Was/were any water sample(s) collected from the excavation?
If Yes, please describe:

(7) (N) Y Have any soil and/or water samples results been received at this time?
If so, please attach any lab reports.

IF GROUNDWATER HAS BEEN ENCOUNTERED, PLEASE ANSWER QUESTIONS 8-13, BELOW.
IF NO WATER HAS BEEN ENCOUNTERED, PLEASE SKIP TO QUESTION #14

(8) What are the known uses of groundwater within a 500 foot radius of the release site?
___ non-use; ___ industrial; X agricultural; X drinking supply

(9) If groundwater in this area is being used as a drinking water supply, please check the following type of population and size served by the supply:

X Community (community well used for drinking water year round)
size: ___ <1,000 people; X 1,000 - 5,000 people; ___ >5,000 people

___ Intermittent use (public water used for drinking water only on a part-time basis)
size: ___ <50 people; ___ 50 - 300 people; ___ >300 people

___ Private wells (individual private well or wells used for drinking water)
size: ___ <10 people; ___ 10 - 25 people; ___ >25 people

(10) (N) Y Is there any evidence this water supply has been, or is likely to be impacted from the petroleum product release? If Yes, estimate how difficult it would be to replace the existing supply:

___ bottled water is the only alternative
___ on-site water treatment; bulk water delivery; new wells are available
___ able to connect to existing water supply
___ do not know what alternatives would be available

(11) (N) Y Are/were there any vapors present in on-site or nearby buildings? If yes:

A. Are you monitoring and/or mitigating any potential fire and safety hazards posed by vapors and free product?
Explain:_____

B. Estimate the number of people potentially affected by vapors:
___ 1-2 people; ___ 3-10 people; ___ >10 people

(12) (N) Y Are vapors or is petroleum contamination present in the utility corridors?
If yes, please explain:_____

(13) N (Y) Are there natural areas within 1/4 mile of the site? If so, please explain type(s) (parks, rivers, wetlands, sensitive habitats, etc.) and proximity:
Ochoco Creek ≈ 100 yd North

(14) N (Y) If groundwater was not encountered in the excavation, do you believe that this cleanup project can be conducted under the requirements for an UST Cleanup Matrix site?

AREA/SITE CONDITIONS:

(15) Mean annual rainfall: X <20 inches; ___ 20-45 inches; ___ >45 inches

___ clays, compact tills, shales, and unfractured metamorphic and igneous rocks

X sandy loams, loamy sands, silty clays, clay loams, moderately permeable limestone, dolmite, sandstones, moderately fractured igneous and metmorphic rock

___ fine and silty sands, sands and gravels, highly fractured igneous and metamorphic rock, permeable basalts and lavas, karst limestones and dolmites.

SOIL MANAGEMENT

(17) If soil sample results have been received:

N (Y) Will the level of contamination detected require removal of contaminated soil for treatment or disposal?

(18) All contaminated soil temporarily stockpiled onsite prior to treatment or disposal must be contained within a bermed area, kept covered, and the entire area secured to prevent unauthorized access by the public. If you haven't done this, please explain why:

(19) If contaminated soil is currently stockpiled onsite, please indicate when disposal will occur or when treatment will begin: Following receipt of lab results ~ May 1, 1998

Note: Contaminated soil cannot be stockpiled onsite for more than thirty (30) days without applying for a Solid Waste Letter of Authorization (SWLA)

(20) Estimated volume of contaminated soil (tons or cubic yards): 15

(21) Intended disposition of soils (please check one):

___ Onsite treatment, Solid Waste Letter Authorization Permit Application attached.

___ Offsite treatment, Solid Waste Letter Authorization Permit Application attached.

___ Thermal treatment offsite at an authorized facility.
Facility name:

___ Thermal treatment onsite with a mobil treatment unit, permit required from DEQ.
Company name

X Landfill disposal.
Name of Landfill: Deschutes County Knott Landfill

Note: Please attach additional information as necessary to explain any unusual circumstances associated with this project.

This initial report is intended to provide the Department with the basic initial information about activities associated with the release. Future reports must be much more detailed and provide a complete picture of the cleanup project.

THIS REPORT WAS PREPARED BY:

Individual: Robert E. Shimek Phone: 541/383-1406
Company: Environmental Consulting & Investigation Inc
Address: 777 NW Wall St Suite 306
City Bend State OR Zip 97701

Please return this form to:

DEQ
Tanks Program
2146 NE 4th, Suite 104
Bend, OR 97701

If you have questions, call Shari Harris-Dunning in the Bend Tanks Program (541) 388-6146 ext. 240.

REMINDER: Submit UST Decommissioning/Change-in-Service Report forms and UST Decommissioning Checklists to:

DEQ
UST Compliance Program
811 SW 6th Ave.
Portland, OR 97204

Failure to do so can result in delays to your project and may result in continued billing for the tank permit fees.

Please be aware that a DEQ permit/authorization is required for the following activities:

1) Soil aeration, bioremediation (on-site or off-site) or on-site thermal treatment.

2) Water discharges to a stream/storm drain from the excavation or treatment tank.

If these activities will be included in your cleanup project, contact the regional DEQ office for the appropriate application forms, information on permit fees and guidance documents.

Note: If there will be emissions from pollution control equipment (e.g. air strippers, vapor extraction systems, etc.), notify the DEQ by phone before installation. Have actual or estimated emissions calculated before calling.

KEEP A COPY OF THIS REPORT FOR YOUR FACILITY RECORDS

Oregon
Theodore R. Kulongoski, Governor

Department of Environmental Quality
Eastern Region The Dalles Office
400 East Scenic Drive, Suite 307
The Dalles, OR 97058
(541) 298-7255
FAX (541) 298-7330

Ext 31

February 23, 2004

RECEIVED
FEB 27 2004
By

Donna Barnes
Ochoco Lumber Company
P.O. Box 668
Prineville, OR 97754

Re: **Notice of Site Assessment Review**
Ochoco Lumber Mill
Prineville, Oregon
Crook County
ECSI #2483

Ms. Barnes:

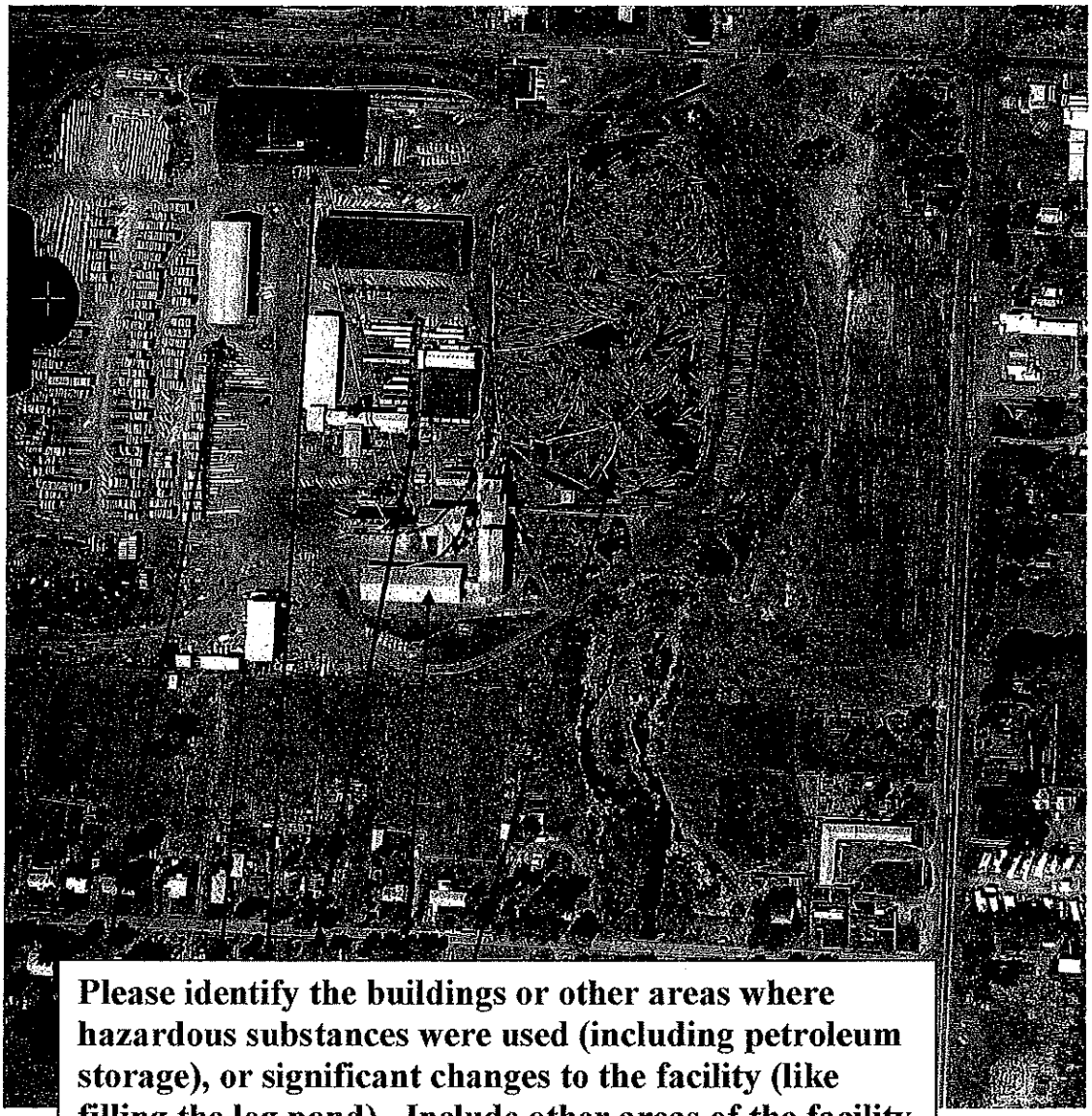
The Oregon Department of Environmental Quality (DEQ's) Site Assessment Program, which evaluates properties with known or potential environmental contamination, is performing a preliminary review of file information for the Ochoco Lumber Mill Site, located on Combs Flat Road in Prineville, Oregon. This review is being performed under Oregon's Environmental Cleanup Law (Oregon Revised Statutes (ORS) 465.245), as well as under an agreement with the U.S. Environmental Protection Agency (Cooperative Agreement V-990519-02).

The site is included in DEQ's Environmental Cleanup Site Information System (ECSI), which contains information on over 2,000 Oregon facilities where hazardous substances are suspected or known to have been released to the environment.

We want to give you an opportunity to provide any information that we may not be aware of, including recent investigations or cleanup reports that we may not already have. DEQ will use the information you provide to determine whether your facility will require further action and what priority to assign such further action. Your assistance in gathering this information will help to ensure an accurate and thorough review of the site. We ask that you address each of the following issues, to the best of your knowledge, for the site listed above:

1. Please provide copies of any environmental assessment reports for the site. However, please note that we already have a copy of the 1998 Soil Cleanup Documentation by Environmental Consulting & Engineering (ECI).

2. Please provide additional information regarding your ownership of the property. Specifically, when you obtained the property, activities you have conducted, and any information you may have regarding past owners and activities.



Please identify the buildings or other areas where hazardous substances were used (including petroleum storage), or significant changes to the facility (like filling the log pond). Include other areas of the facility not shown on this photo.

August 1, 1975 aerial.

Ochoco Lumber Company

Manufacturers of Quality Lumber
since 1938

Corporate Office
P.O. Box 668
Prineville, OR 97754
Phone (541) 447-6296
Fax (541) 447-8992

Ochoco Lumber - East
P.O. Box 668
Prineville, OR 97754
Phone (541) 447-4164
Fax (541) 447-3432

UAB Ochoco Lumber
4880 Aleksandrijos Kaimas
Kupiskio Rajonas, Lithuania
Phone 011-370-459-35217
Fax 011-370-459-35209

Malheur Lumber Company
P.O. Box 160
John Day, OR 97845
Phone (541) 575-2054
Fax (541) 575-2057

March 8, 2004

Friday May 21st
10:30 AM

Department of Environmental Quality
Attn: Dan Crouse
400 East Scenic Drive, Suite 307
The Dalles, OR 97058

RE: Notice of Site Assessment Review – ECSI #2483

Dear Dan,

We received your letter of February 23rd regarding your need for additional information on our Prineville Plant site. Stuart J. Shelk Jr. is the majority owner of Ochoco Lumber Company, which is an Oregon Limited Partnership.

The Large Log Mill was built in 1938. The first planing mill was added in 1939 along with dry kilns, and storage sheds. In 1987 the small log mill and an additional planer were constructed and started operating in 1988. In October 2000, the large log mill discontinued operation followed by the shut down of the small log mill in July 2001. The company continually operated from 1938 to 2001 sawing logs, drying and planing lumber, but has remained idle since July 2001.

In 1998, we removed underground fuel storage tanks and cleaned up the surrounding soil. Environmental Consulting & Engineering has documented this with DEQ as outlined in your letter.

In July 2000, we completed the installation of an economizer, a multiclone and an induced draft fan on Boiler 7 to minimize particulate emissions. The plan and source testing was approved by DEQ.

Prior to the 2001 shutdown, we purchased a Log Waste Recycling Machine in order to recycle log yard waste, utilizing the cleaned rock and appropriately disposing of unusable cleaned bark at the local landfill.

We also drained the log pond as mandated by DEQ to protect the water temperature in the creek that runs through our property. We have since filled that area with rock and concrete from other local area projects. We have been diligent to allow only "clean" fill to be dumped into the pond area.

Currently, we have a small number of sealed oil barrels on site that will be sold at auction. All other fuels and chemicals have been transferred to our John Day plant for consumption. We have empty containers to be used by dismantlers during the tear down phase to fill with hydraulic oils that need drained from equipment. We will then dispose of this according to DEQ guidelines.

There is a diesel tank that runs the pump to supply water for our fire hose system, which will have to be maintained during the dismantling phase for initial fire suppression.

We are in the process of having exposed asbestos removed from the boiler room area this week by Alpine Abatement. DEQ has received proper notification and Frank Messina of the DEQ Bend Office is monitoring that project. We are aware of asbestos in the walls of the #7 boiler. We have had three abatement companies look

at this and give quotes for removal. We will wait for the auction to try to work in conjunction with the buyer of this boiler and remove the asbestos as he dismantles it. If it does not sell, we will dismantle and remove the asbestos then. There is a water softener holding tank that has suspicious material on it. We found documentation that this material had been tested by DEQ with negative results, but we have no official documentation that the material is not asbestos. Therefore, we sent a sample to a laboratory and should have results back within the next two weeks as to whether we have any asbestos present on the water tank.

There are some old transformers on site, but have confirmed that they are owned by Pacific Power. On March 29th, Pacific Power will be on site to remove all lines and transformers before major dismantling begins.

If you have any questions or need further information, please call me at (541) 447-6296.

Sincerely,

Donna E. Barnes

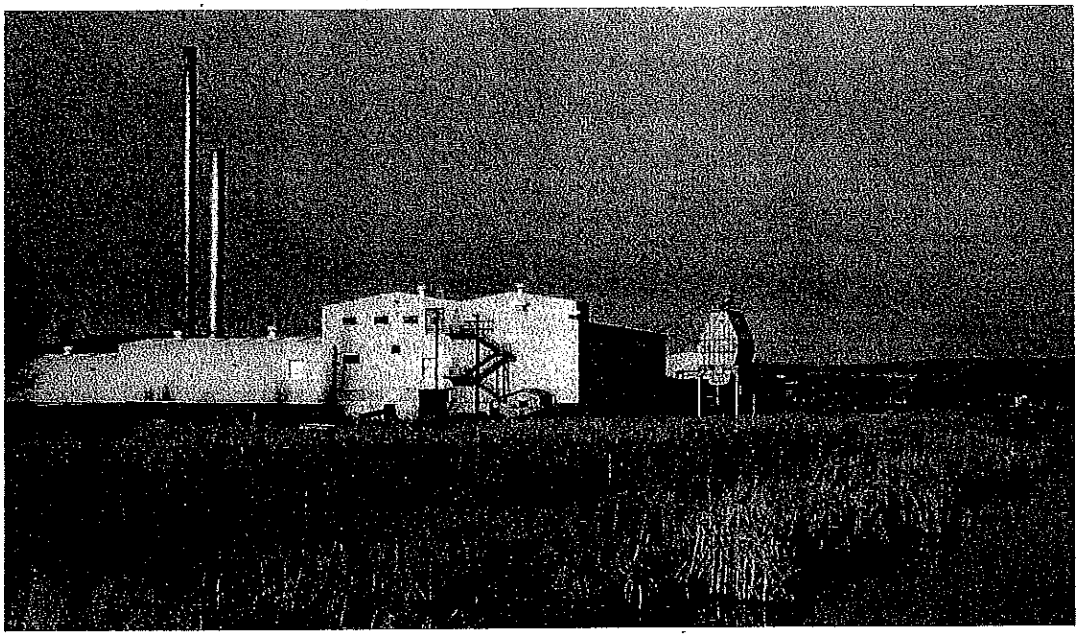
Donna E. Barnes
Accounting Manager
Ochoco Lumber Company

DEQ SITE ASSESSMENT PROGRAM - STRATEGY RECOMMENDATION

Site Name:	Ochoco Lumber – Prineville Plant
Site CERCLIS Number:	N/A
DEQ ECSI Number:	2483
SAPS Score/Priority:	92/High
Site Address:	Combs Flat Road, Prineville, OR NW ¼ of Section 5, T15S, R16E
Recommendation By:	Dan Crouse, Project Manager, Site Assessment Section, DEQ Eastern Region
Approved By:	Sheila Monroe, Cleanup Program Manager
Date:	June 21, 2004

Background:

The Ochoco Lumber – Prineville Plant site is located in the southeast corner of the Combs Flat Road and Highway 26 intersection in Prineville, Oregon (see Figure 1 and below). The



Ochoco Lumber circa 2000.

Crook County site is an inactive lumber mill that operated for more than 60 years. Primary activities were sawing logs and drying and planing lumber. The site, which has been inactive for the past three years and is being dismantled, is also located in EPA Vulnerable Areas for High Density Wells and High-Poverty Census Tracts.

Site Description/History:

The 77-acre site is in an area of mixed industrial, commercial, residential, and recreational use. It is bordered by residential neighborhoods to the south, west, and east, a junior high school to the west, and by Hwy 26 and mostly commercial properties to the north. The site is relatively flat, partially paved, but mostly unpaved with gravel or dirt driveways.

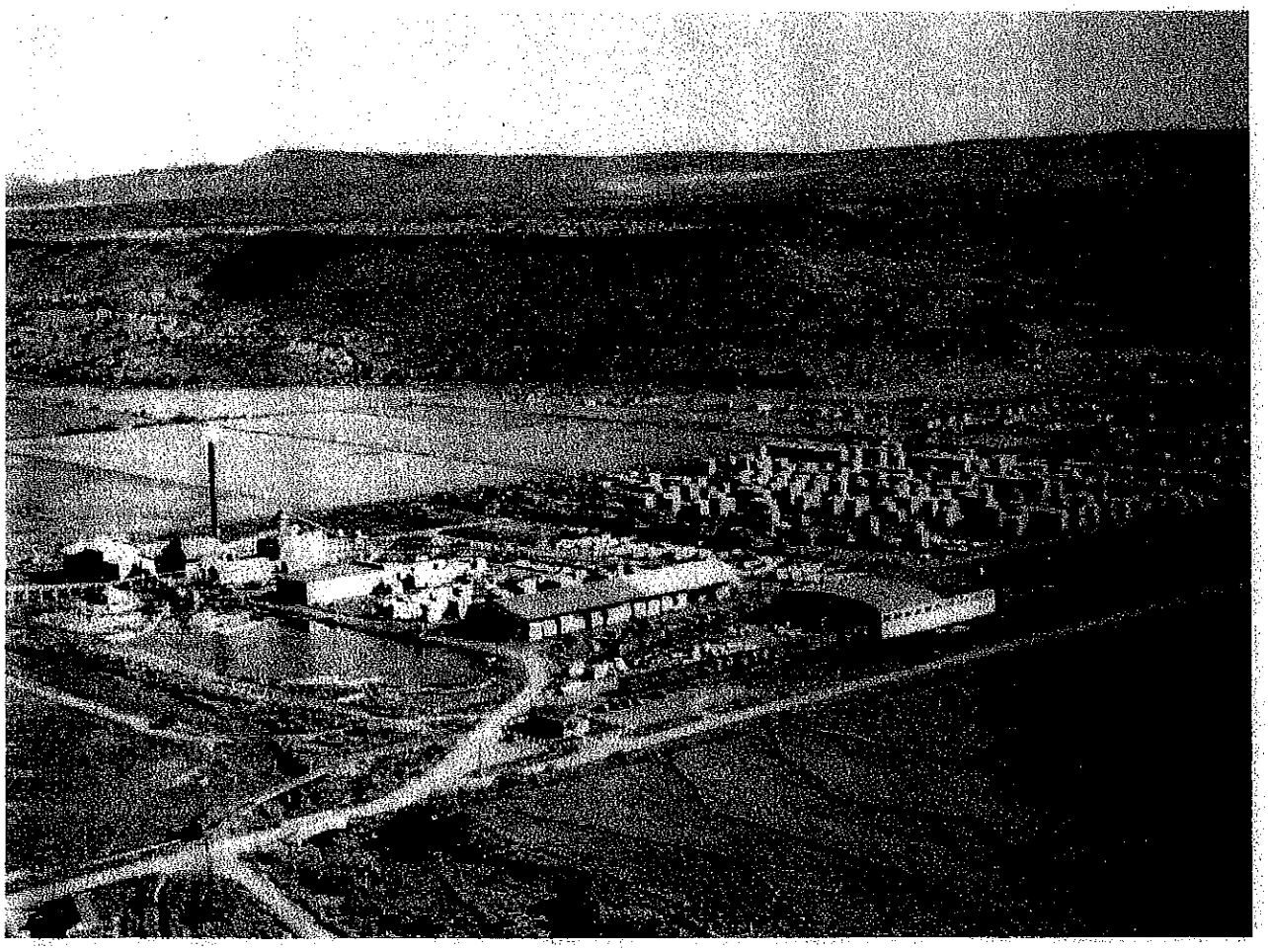
August 1, 1975

According to the company, the mill operated continually from 1938 to 2001 (see Attachment 1). The Large Log Mill was built in 1938 and the first planing mill was added in 1939 along with the dry kilns and the storage sheds.

A barker was added during the later 1950s or early 1960s. The facility went through a major renovation during the early 1970s that included adding a new chipper and horizontal resaw (used for dimension lumber such as joists and boards). Another major renovation was completed during 1987-88 when the Small Log Mill and an additional planer were built. The mill also includes a boiler house, a former log pond, outside storage areas, and truck shops; however, wood-treatment and veneer work was not done on site. Ochoco Lumber employed about 150 people and produced about 60 million board feet of lumber in its heyday during the mid-1990s.

The Large Log Mill was shut down during October 2000 and the Small Log Mill was shut down during July 2001. An auction for milling machinery was held during March 2004 and company officials said materials like fuels and chemicals will be transferred to the company's Grant Western Mill in John Day, Oregon.

A review of readily available historic photographs and documents indicates the basic configuration of the facility has not changed much over the years other than the addition of new buildings; however, operations within some of the buildings have changed significantly (see Attachments 2 & 3). The history of each building is needed, with the understanding that many of the buildings and areas will have no releases or de minimis releases. Contaminants of concern (COCs) are predominantly petroleum products (heavy oils, gasoline, and diesel) and solvents.



Ochoco Lumber circa 1940.

Regulatory History:

The facility has affiliations with multiple DEQ programs including Hazardous Waste (HW), Underground Storage Tanks (UST), Leaking Underground Storage Tanks (LUST), and Water Quality (WQ).

DEQ ER/HW staff performed initial, follow up, and sampling inspections at the facility between July and September 1997 (see Attachment 4). The facility's historic waste disposal practice for liquids like petroleum products and anti-freeze was to mix them with the solid hog fuel and burn it in the boiler. The inspections resulted in a Notice of Noncompliance (NON) and civil penalty of $6,000 for "failure to determine which wastes were hazardous, failure to immediately clean up an oil spill as required by law, and failure to label used oil containers and keep them properly covered." The penalty was later reduced to $4,200 and paid in full.

The facility also hired a consultant to address three areas of soil contamination identified during the HW inspection; the bone yard, transformer storage, and used oil storage areas (see Attachment 5 and photo below). The work from late 1997 through early 1998 included the excavation of 56.29 tons of petroleum contaminated soil and disposal at the Crook County Landfill.

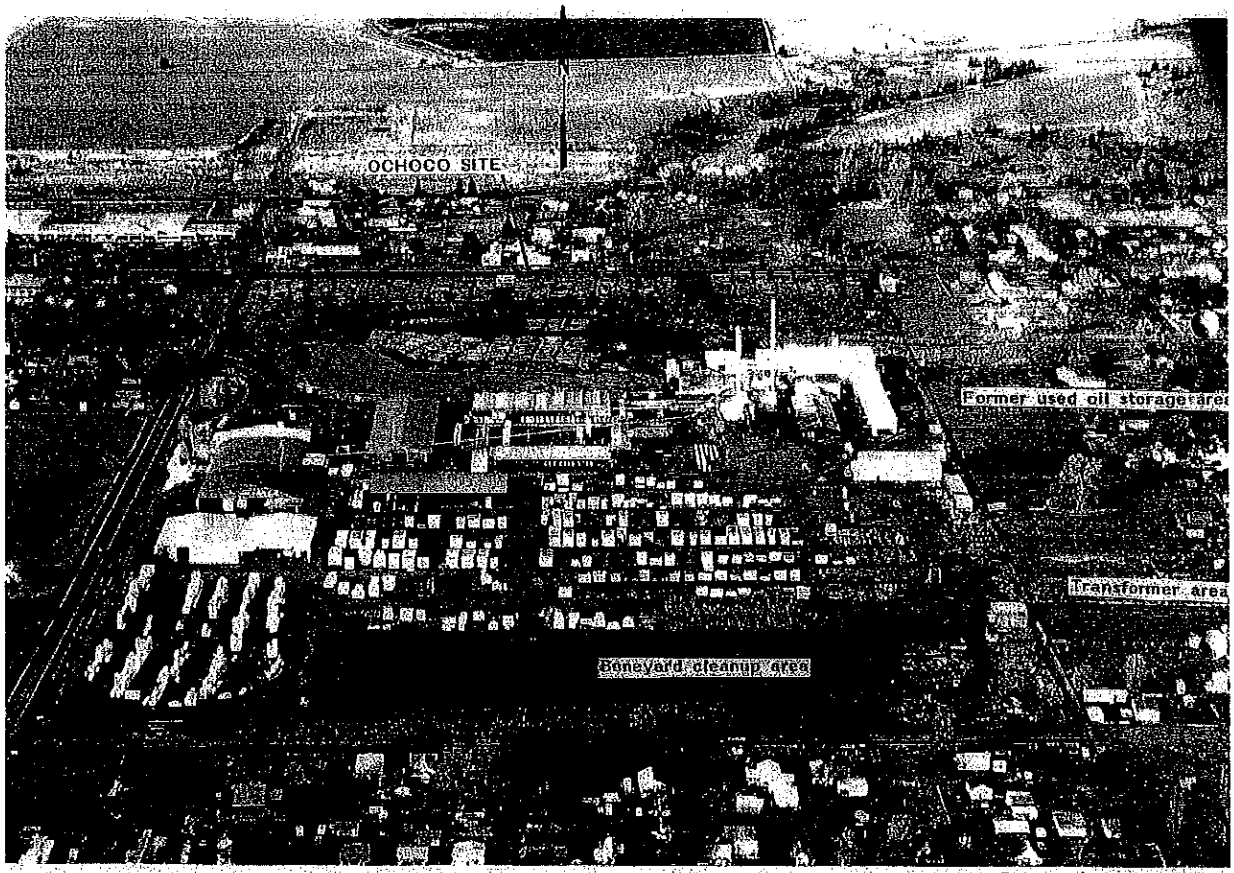


FIGURE 2 SITE MAP

Environmental Consulting & Investigation ECI

The aerial photo from the consultants report shows the three soil cleanup areas in the lower right.

The consultant's report was included in the HW file; however, there is no record of a DEQ sign-off of these cleanup activities. In addition, other areas with releases to soil or the potential for releases were identified in the HW inspection and will need further investigation.

The UST decommissioning and associated soil cleanup were addressed by DEQ's UST and LUST programs (see Attachment 6). The two 10,000-gallon gasoline and diesel USTs were installed in 1956 and removed during April 1998. The USTs were replaced by aboveground storage tanks (ASTs); however, there is no information on how fueling was handled from 1938 through 1956.

Discharges of industrial wastewaters from the boiler to the former log pond were regulated by a NPDES permit. The HW inspection found no evidence that the company was "exceeding these parameters." According to Ochoco Lumber officials, the pond was drained "as mandated by DEQ" to protect the temperature of Ochoco Creek and filled with material including rock and concrete from other local projects. The company said they have been diligent to allow only "clean" fill to be dumped into the pond.

Site Walkover:

A site walkover was conducted by ER/SAS on May 21, 2004. Areas where releases of hazardous substances have been addressed, are being addressed, and will be addressed were discussed with Ochoco Lumber staff and their consultants during the site walkover. Areas with stained soil and standing water with sheens were observed; however, the company said the plan was to wait until after demolition is completed before conducting additional investigation and sampling. (See Attachment 7 for additional site photos.)

The Small Log Mill includes a second degreasing station.

Pathways:

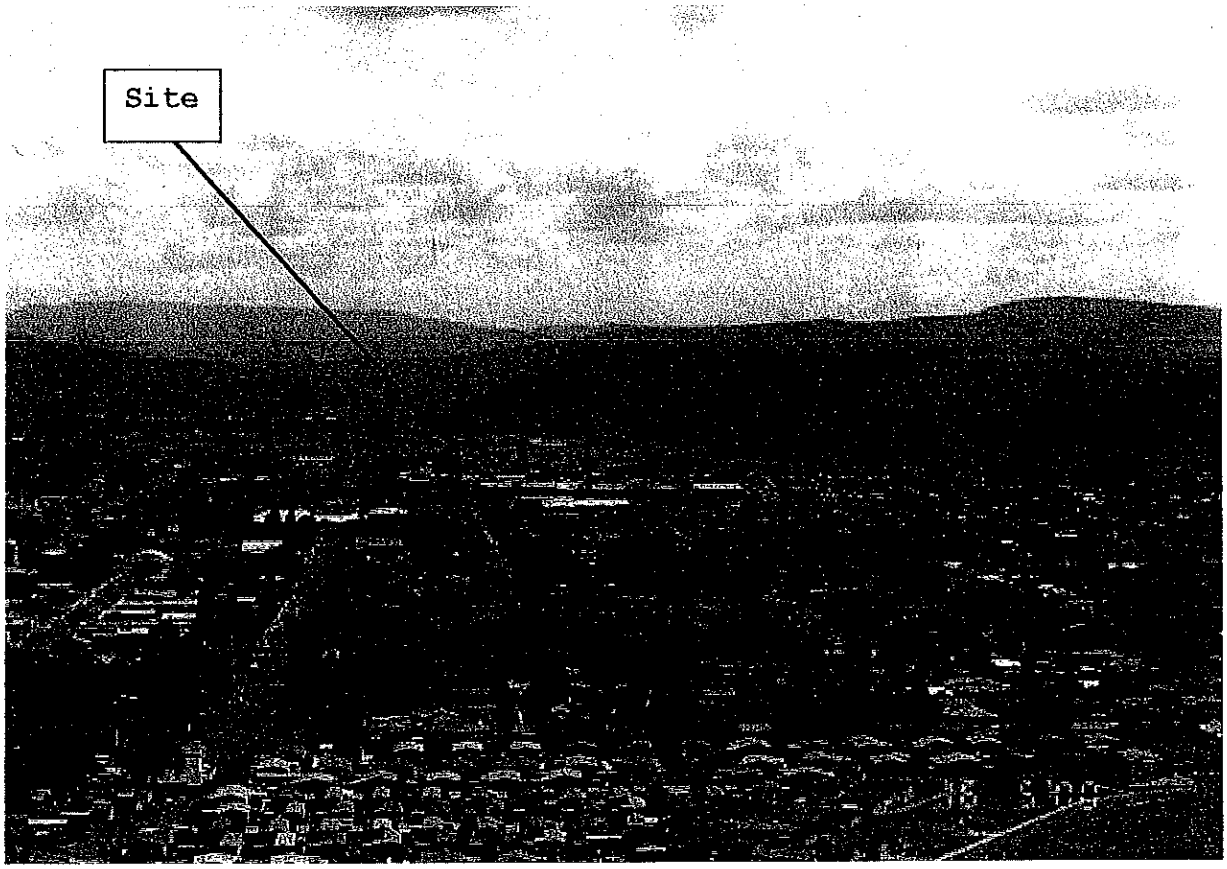


Photo taken May 16, 2000.

The site is on the east side of Prineville, a community of nearly 8,000 in Central Oregon (see Attachment 8). The site is at an approximate elevation of 2,890 feet above sea level and the average annual precipitation for Prineville is 10.74 inches.

Most of the residential properties in the vicinity of the site are on wells and septic systems; however, the Ochoco officials said the City of Prineville plans to extend their water and sewer systems into this area in the future. Currently, there are approximately 100 domestic wells and at least two municipal or community wells within an approximately 1-mile radius of the site. The residential area is also an EPA Vulnerable Area for High Density Wells and High-Poverty Census Tracts.

The site is fenced and posted no trespassing.

Surface Water- The nearest surface water is Ochoco Creek, which runs through the northern portion of the property and flows west. There are fitness trails and a park less than a mile downstream from the site that allow for contact with surface water. The former log pond, located between the creek and the mill complex, has been filled with what the company describes as clean material, including construction debris from local projects. It is possible that the cumulative

cumulative discharges to the pond over the years may have resulted in contaminated sediments. Surface water is a pathway of concern.

Soil – DEQ used four Ochoco Lumber well logs (one domestic and three industrial) to characterize site soils. The surface layer is top soil and gravel ranging from 2 to 9 feet below ground surface (BGS) followed by a brown and sandy clay layer ranging from 1 to 20 feet BGS. Additional layers of gravel, clay, and silts extend to more than 200 feet BGS (see Attachment 9). Several areas of stained soils were noted during the site walkover. Direct contact with hazardous substances is a pathway of concern.

Groundwater – According to well logs, groundwater can be very shallow (from 8 to 12 feet BGS) and there are more than 100 domestic wells within the vicinity of the site in addition to two municipal wells. Groundwater is a pathway of concern.

Air - The site has is bordered on three sides by residential properties and a school. The potential for inhalation of contaminated dust is also a pathway of concern.

Recommendation/Action:

The Site Assessment Program has reviewed file information relating to this site, conducted interviews, and a site walkover. Based on the available information, Site Assessment has scored this facility as a high priority for further action. The site is a former lumber mill where hazardous substances were stored and used for more than 60 years, many of which were prior to formal environmental regulations. The historic practice for liquid wastes was to mix them with the solid hog fuel for burning in the boiler. The site is also in EPA Vulnerable Areas for High-Density Wells and High-Poverty Census Tracks.

Four soil cleanups have been completed, an asbestos cleanup is in progress, and additional investigation is scheduled after the site demolition is completed. Further action includes the tedious process of documenting all prior, on-going, and future remedial activities. It is recommended that the site map provided by Ochoco Lumber (see Attachment 10) be divided into operable units to ensure that all areas where hazardous substances were used, stored, or deposited are either documented as No Further Action needed or evaluated for sampling and cleanup (if needed). DEQ has identified the following areas of concern and further-action needs:

a. The bone yard; a formal review of the cleanup conducted during 1997-98 is needed;

b. The truck shop; formal review of the cleanup conducted during 1997-98 is needed in addition to an evaluation of the main degreasing station that was also identified during the 1997 HW inspection, and any additional area identified after the building has been demolished;

c. Transformers; a formal review of the cleanup conducted during 1997-98 is needed and additional information on the transformers removed by Pacific Power on March 29th, 2004;

d. The Small Log Mill; address the second degreasing station and release to soil identified during the 1997 HW inspection, and any additional area identified after the building has been demolished;

e. The Large Log Mill; address the blade cleaning area identified during the 1997 HW inspection and any additional area identified after the building has been demolished;

f. The green chain; evaluate what appeared to be small oil releases to surface soil;

g. The barker; address hydraulic oil releases to soil identified during the 1997 HW inspection;

h. The planer; evaluate the blind sump identified during the 1997 HW inspection and any additional area identified after the building has been demolished;

i. The boiler/powerhouse; update the progress of the active asbestos cleanup;

j. The former log pond; evaluate the need for sediment sampling;

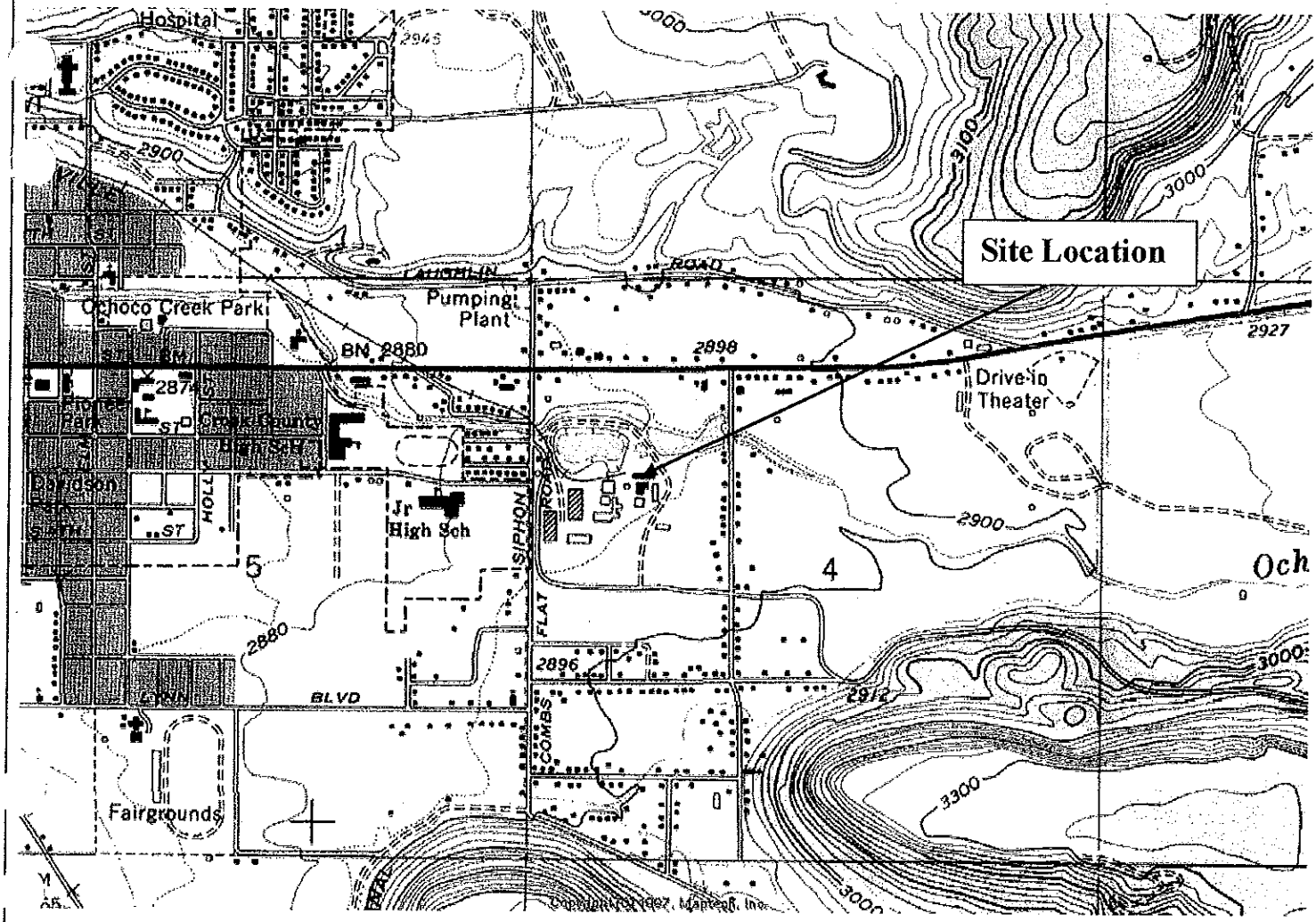
k. The existing AST and former ASTs;

l. The Old Truck Shop; evaluate the potential for a sump or dry well;

m. Additional areas identified during the post-demolition investigation.

Due to the size of the facility, the length of operation, and surrounding vulnerable or sensitive areas, it is recommended that a remedial investigation be completed by the RP with oversight by DEQ's Voluntary Cleanup Program (VCP).

It is recommended that the site be proposed for DEQ's Confirmed Release List. Responsible Party

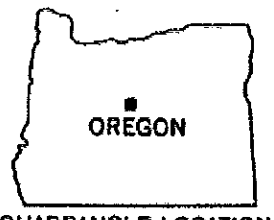


N

REFERENCE

USGS 7.5 Topographical Maps
Prineville, Oregon, 1962

SCALE 1 inch = 2,000 feet



QUADRANGLE LOCATION

DEQ

Ochoco Lumber Mill
Combs Flat Road
Prineville, Oregon

SITE LOCATION MAP

FIGURE

1

Ochoco Lumber Company

Manufacturers of Quality Lumber since 1938

Corporate Office
P.O. Box 668
Prineville, OR 97754
Phone (541) 447-6296
Fax (541) 447-8992

Ochoco Lumber - East
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Fax 011-370-459-35209

Malheur Lumber Company
P.O. Box 160
John Day, OR 97845
Phone (541) 575-2054
Fax (541) 575-2057

September 1, 2004

Department of Environmental Quality
Attn: Dan Crouse
400 East Scenic Drive, Suite 307
The Dalles, OR 97058

RE: Notice of Site Assessment Review – ECSI #2483

Dear Dan,

During your site visit on May 21, 2004, you expressed concern and the desire to follow-up on a pipe that was found during the July 29, 1997 inspection that was suspect of accessing an underground tank. I found a letter from Ochoco in response to this tank dated October 22, 1997. A copy of this letter is attached with the explanation that the pipe did not lead to a tank, but was a shallow "sand point" well which was a common practice in this area in the 1940's. The reason we could not find the pipe on the May 21st walk-through was that Mr. Lyons, the responsible party at the time of the 1997 inspection, was given directive in a Notice of Noncompliance from DEQ dated October 6, 1997 (page 6) to remove the pipe if it was found not to be associated with a tank contaminated with hydrocarbons.

Your other area of concern was the status of a solvent station in the mill. Page 6 of the October 6th Notice instructed us to discontinue use of the solvent station. Because this Notice did not give us any other option than to discontinue use, and the solvent tank was not addressed again in later correspondence or in the Notice of Civil Penalty dated December 19, 1997, I can only draw the conclusion that the solvent station was removed as directed.

I hope this will close the two remaining issues and allow the first phase of the Site Assessment to be completed. If you have any questions or need further information, please call me at (541) 447-6296.

Sincerely,

Donna Barnes

Donna E. Barnes
Accounting Manager
Ochoco Lumber Company

Encs: Notice of Noncompliance dated 10-6-97; Ochoco's Response dated 10-22-97; Notice of Assessment dated 12-19-97

Cc: Steve Paulsen, Paulsen Environmental *(w/o enclosures)*