



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

June 3, 2024

Bill Avison
PO Box 419
Molalla, OR 97038

via electronic delivery (email)

**Re: Notification of Modifications to Remedial Action Plan
Former Avison Mill #1 Site
Molalla, Oregon
ECSI# 4014**

Dear Bill Avison:

The Oregon Department of Environmental Quality (DEQ) reviewed the *Notification of Modifications to Remedial Action Plan*¹ (RAP Modifications Memo). The RAP Modifications Memo was prepared by SLR on behalf of Avison Lumber Company (Avison). The RAP Modifications Memo describes proposed modifications to the *Revised Final Remedial Action Plan*² (Revised Final RAP), which was approved by DEQ on July 7, 2023³. The RAP Modifications Memo also includes a revised table summarizing construction quality assurance (CQA) measures for remedial action construction and the *Operations Monitoring and Maintenance Plan*⁴ (OMMP).

Our approval of the information included in the RAP Modifications Memo is as follows:

- DEQ approves the proposed modifications to the RAP, as documented in the RAP Modifications Memo.
- The revised CQA table does not list the frequency for compaction testing of clean fill cap material. DEQ assumes that clean cap material will be placed in 12-inch lifts, and that compaction testing will be completed at a frequency of one test per 10,000 square feet, consistent with the testing frequency for consolidated surface soils. DEQ approves the revised CQA table based on this assumption. In addition, we request that Avison take representative photographs for each construction activity and include these photographs in the Remedial Action Summary Report.
- DEQ requires that Avison provide photographs of the cap areas in future annual reports. Should cap repairs be necessary, DEQ requires Avison to submit a Cap Repair Work Plan for DEQ review and approval before proceeding with repair activities. DEQ approves the OMMP based on these requirements.

¹ SLR. 2024. Notification of Modifications to Remedial Action Plan, Former Avison Mill #1 Site, Molalla, Oregon. May 17.

² SLR. 2023. Revised Final Remedial Action Plan, Former Avison Mill #1. June 28.

³ DEQ. 2023. Letter to Bill Avison (Avison Lumber Company). Regarding: Revised Final Remedial Action Plan, Former Avison Lumber Company, Mill #1, ECSI# 4014.

⁴ SLR. 2024. Operations Monitoring and Maintenance Plan, Former Avison Mill #1 North and South Parcel Remedial Action. May.

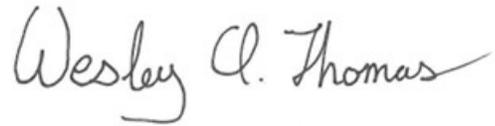
Notification of Modifications to Remedial Action Plan

June 3, 2024

Page 2

Please do not hesitate to contact me at (971) 263-8822 or Wesley.Thomas@deq.oregon.gov if you have questions regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Wesley A. Thomas". The signature is written in a cursive style with a large, prominent "W" and "T".

Wesley A. Thomas, PE
Project Manager
NWR Cleanup Section

EC: Dan Hafley, DEQ
Chris Kramer, SLR
R. Scott Miller, SLR
ECSI No. 4014 File