Contaminated Soil and Solid Waste Cleanup Work Plan King Salvage 109 King Place Toledo, Oregon

Prepared for:
Oregon Department of Environmental Quality
Task Order No. 066-23-14

August 22, 2024
32-23010077 / Task 5

Solid and Hazardous Waste Cleanup Work Plan
King Salvage
109 King Place
Toledo, Oregon

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1.0 Introduction

This Apex Companies, LLC (Apex) Cleanup Work Plan (CWP) presents the scope of work to implement the conclusions and recommendations as summarized in the updated analysis of brownfield cleanup alternatives (ABCA; Apex, 2024a) for the former King Salvage site in Toledo, Oregon (the Site; ECSI No. 2751). The focus of Apex's CWP shall be to: remove petroleum-impacted soils that may pose an unacceptable risk to human and ecological receptors; restore disturbed areas with clean soils to limit risk of exposure to residual concentrations of petroleum that may remain after excavation; and seed the disturbed area with species suitable for site conditions to establish a vegetative cover that will both limit receptor contact and provide passive phytoremediation to further reduce residual contaminant concentrations sitewide. This CWP was prepared for the Oregon Department of Environmental Quality (DEQ) under Task 5 of Task Order 066-23-14. Additional discussion of the project background and site history is included in the ABCA (Apex, 2024a) and other prior documents.

1.1 Purpose

The purpose of this CWP is to summarize field activities designed to remove petroleum-impacted soils in the corrective action area (CAA) identified in the updated ABCA (Apex, 2024a) and shown in Figure 4. The proposed field activities include excavation of approximately 885 cubic yards of contaminated soil, collection of soil samples from the excavation cavity to characterize soil conditions and confirm that cleanup objectives have been met, and site restoration and seeding to re-establish the vegetative cover in the disturbed area. This CWP documents the methods that will be used to complete the proposed field activities.

1.2 Scope of Work

To accomplish the above objectives, the scope of work (SOW) described in this CWP includes the following tasks:

- Procurement of an excavation subcontractor to complete the scope of the cleanup action;
- Cultural resources consultation with the Siletz Tribe to review the scope of work and existing inadvertent discovery plan (IDP);
- Removal of vegetation and trees in the CAA;
- Excavation of approximately 885 cubic yards of contaminated soils in the CAA;
- Collection of confirmation samples in each excavation subunit to characterize the post-excavation Site conditions;
- Backfill, restoration and re-seeding of excavation area, and;

- Preparation of a summary report of the sampling following completion of the scope of work, which will include observations, field notes, site photos, and an evaluation of information obtained during field activities.

These activities are discussed in further detail within this CWP.

2.0 Background

This section presents a brief description of the Site, its history, and available physical and chemical data. Information included in this section was obtained from previously completed site investigations and related work within the vicinity of the Site.

2.1 Site Location and Description

The former King Salvage facility is located off Highway 20 at 109 King Place in Toledo, Lincoln County, Oregon. The Site is located within Township 11 South, Range 11 West, Section 11. The former King Salvage facility is split into two tax lots with different zoning: tax lot 11-11-11-00-00901-00, 6.56 acres zoned for timber conservation and associated with the operation of King Salvage Co; and tax lot 01000-00, 1.68 acres zoned for agricultural conservation and associated with a residence. Significant amounts of solid and hazardous wastes have previously been encountered on the King Salvage Site but not the residential property. Cleanup actions on the King Salvage Site have removed a significant volume of waste materials, but some residual wastes and contamination remain.

The former King Salvage facility is identified as record #3376 within DEQ's Your DEQ Online (YDO) public information database.

2.2 Site History

The Site was formerly operated by King Salvage Co., which was primarily an automobile wrecking and salvage yard that operated for over 30 years, though historical use of the property involved the receipt of a variety of waste materials. Lincoln County obtained the Site through tax foreclosure on August 22, 2017. DEQ became aware of the Site via a pollution complaint made in July 2000 from the Oregon Department of Transportation (ODOT). ODOT reported oil migrating from King Salvage into the unnamed tributary that runs through the Site. Subsequent inspection by DEQ documented releases of hazardous substances to on-site soils and large quantities of accumulated solid waste throughout the Site. DEQ issued several notices of violation (NOVs) to the property owners related to storing solid waste and an excess amount of waste tires without a permit, the release of hazardous substances to the ground, failure to clean up hazardous substance releases, improper storage of used oil, and open burning of prohibited materials.

In January 2009, the U.S. Environmental Protection Agency (EPA) evaluated the Site via the collection of soil/surface water samples from five on-site decision units: the automobile crusher area; on-site areas where vehicles were drained of automotive fluids; the unnamed surface water tributary; areas with significant staining within the automobile salvage operation; and the on-site residence.

In May 2009, in response to the NOVs issued by DEQ and the sampling conducted, the EPA conducted a Time Critical Removal Action using Oil Pollution Act funds. EPA removed 500 tons of contaminated soil from the Site in the area in front of the car crusher and on the King Place road surface, as well as 50 drums of used oil. Approximately 230 light ballasts, possibly containing polychlorinated biphenyls (PCBs), were drummed by EPA and stored on-site. Additional solid waste left onsite following the 2009 cleanup included abandoned vehicles, tires, appliances, fuel storage tanks and drums, and piles of miscellaneous waste and debris.

In 2018 and 2019, Lincoln County conducted several efforts to remove significant quantities of solid waste from the front portion of the Site; ODOT removed vehicles and solid waste in the right-of-way. In 2020 and 2021, DEQ completed cleanup activities to remove the majority of remaining aboveground solid waste, including characterization and disposal of drums containing fuel and other hazardous wastes. Additional solid waste, metal debris, and petroleum-impacted soil was identified in subsequent geophysical, test bore, and test pit investigations conducted in 2021 and 2022.

In April 2024, Apex completed a supplemental site investigation (SSI) direct-push soil sampling at the King Salvage (former) Site. The scope of work included collecting and analyzing additional shallow subsurface soil and streambed sediment samples to refine the understanding of the source, magnitude, and extent of contamination at the Site. The results of this work are documented in the SSI data memorandum (Apex, 2024b).

2.3 Nature and Extent of Contamination

Based on the findings of current and previous site investigations, the contamination identified within the shallow Site soils extends beyond decision unit DU-6 and the former car crusher area. Contaminated soils were identified in the subunits of decision unit DU-4, particularly subunit DU-4F where contamination was localized and exceeded construction worker DEQ risk-based concentrations (RBCs) for generic diesel and lead. The most significant impacts were observed in the vicinity of the former car crusher and to the west (subunit DU-4F). In addition, more widespread metals and dioxin concentrations exceeded the ecological risk screening levels (RSLs) in subunits DU-4C, DU-4E, DU-4F, DU-4G, and DU-4I. The layout of the decision units is shown on Figure 3.

Removal by excavation and off-site disposal was identified in the ABCA as the preferred alternative to address the risk associated with human and ecological contact with the impacted soil by removing the impacted material from the Site. Excavation will not be able to remove all site-related contaminants, and instead will target the relatively higher concentrations and allow natural processes to address the residual contamination.

The corrective action area has been identified for targeted cleanup via excavation, as shown on Figure 4. The area covers 10,900 square feet (6,000 square feet for the area around the former car crusher, 2,600 square feet for decision units DU-4F and DU-4G to the west, and 2,300 square feet for decision unit DU-4I to the south). Based on the findings of the site investigations, the depth of contamination is limited to about 2.5 feet below ground surface (bgs) within the area of the car crusher and decision units DU-4F and DU-4G, and to a depth of about 1 foot bgs in decision unit DU-4I, resulting in a total volume of approximately 885 cubic yards.

3.0 Site Activities

The proposed excavation and site restoration activities are described in the sections below. Field documentation will be completed for elements of the project including general weather conditions, daily site safety briefings, activity logs, sample locations, changes to the scope of work, and sampling chain-of-custody. Additional detail is found in the sampling and analysis plan (SAP), included in Appendix A.

3.1 Preparatory Activities

Cultural Resource Consultation and Inadvertent Discovery Plan Implementation. Lincoln County is part of the Siletz Service Area of the Confederated Tribes of Siletz Indians. Areas around Yaquina Bay and River were previously home to the Yaquina Tribe (now included within the Siletz Tribe). Areas around Alsea Bay and River were previously home to the Alsea Tribe (now also included within the Siletz Tribe). Multiple remnants of tribal settlements in the area have been previously discovered (City of Toledo, 2017).

The Siletz Tribe was consulted in 2019 by Stantec regarding potential cleanup of the Site as part of the cultural and tribal resource coordination process under the Historic Preservation Act. Based on that consultation, Apex prepared an IDP in 2020, which is included as Appendix B. The IDP was prepared to protect cultural resources that are significant to local tribes and to develop a plan to proceed with the solid and hazardous waste removal activities while avoiding and minimizing impacts to cultural resources.

Apex will consult with the Siletz tribe prior to the start of excavation to review and, if necessary, update the 2020 IDP. The IDP will be followed during the proposed excavation and site restoration activities and will be reviewed with subcontractors and Apex staff prior to initiating field work.

Property Access. Apex will coordinate with the property owner (Lincoln County) prior to scheduling the cleanup activities.

Site Health and Safety Plan. A Site-specific health and safety plan (HASP) has been prepared for the proposed activities (Appendix C). The HASP was prepared in general accordance with the Occupational Safety and Health Administration (OSHA) and the Oregon Administrative Rules (OAR). A copy of the HASP will be maintained on-site during the field activities.

Prior to performing any on-site work, Apex will prepare a job safety analysis (JSA) and HASP guiding Site- and project-specific activities, risks, and safety protocols. All field staff and subcontractor personnel supporting the project will be required to review and agree to abide by the HASP. Safety topics will be refreshed daily with the field crew using a daily tailgate safety meeting, to be conducted by Apex's site supervisor or site safety officer. The daily tailgate form will be completed each day and signed by all attendees. The HASP also addresses precautions to be taken at the Site due to the current COVID-19 pandemic.

Underground Utility Clearance. Prior to commencing solid waste removal activities, Dig-Alert/Underground Service Alert (USA) will be contacted as a precaution to enable identification of nearby underground utilities.

Site Preparation. The Site is fenced and privately owned land; however, if needed, additional temporary fencing will be placed around the solid and hazardous waste removal area(s). Work zones and staging area(s) for vehicles, equipment, and debris will be identified and delineated. A decontamination station will also be placed on-site to decontaminate equipment after use.

In addition, booms, silt socks, and/or silt fences will be placed on-site as-needed to protect the stream from being impacted during upland cleanup activities. A buffer zone will be maintained between the on-site stream and the removal activities to provide further protection to the stream. Preparation of the Site may require the removal of some low-value or common trees (such as alder) to provide access for the excavation equipment. High-value tree species (such as willow or other hardwood species) will be identified and flagged to be protected during the work. Site conditions will be monitored during excavation activities, and temporary matting will be used for heavy equipment during the removal activities, if necessary.

3.2 Excavation of Contaminated Soil and Associated Solid Waste Debris

The cleanup action selected includes excavation of the relatively higher impacted areas (as shown on Figure 4), transportation and disposal of approximately 885 cubic yards of excavated soil and solid waste debris, backfilling of the excavation with clean imported soil, and restoration of the disturbed areas to a natural state and the grade of the surrounding area. The selected excavation areas and estimated removal volumes include:

1) Removal of approximately 560 cubic yards of impacted soil from around the former car crusher (an area of 6,000 square feet to a depth of approximately 2.5 feet);
2) Removal of approximately 240 cubic yards of impacted soil from subunits 4F and 4G (west of the car crusher; an area of 2,600 square feet to a depth of approximately 2.5 feet);
3) Removal of approximately 85 cubic yards of impacted soil from subunit 4I (south of the car crusher; an area of 2,300 square feet to a depth of approximately 1 foot);
4) Removal and proper disposal of solid waste and debris, including existing waste stockpiles and waste encountered during excavation of contaminated soils.

Prior to initiation of the excavation activities, the boundaries of the excavation area will be located using a hand-held sub-meter GPS device and marked with flagged stakes.

Waste Characterization, Transport and Disposal. Excavated soils will be properly characterized for disposal at an authorized Subtitle D landfill. Solid waste and metal debris will be sorted and transported for disposal or recycling as appropriate (including waste materials previously stockpiled at the Site and identified for disposal and waste materials that may be encountered during the excavation work). It is anticipated that the soil data collected during the SSI will be used to pre-characterize the excavated soil for disposal.

The subcontractor will coordinate with Lincoln County's waste hauler franchisee, Dahl Disposal, for transport and disposal of all soil and solid waste materials generated during the cleanup action.

Dewatering and Solidification. Saturated soil conditions and ponded water may be encountered during excavation. If dewatering is necessary to complete the scope of work, impacted water will be removed from the excavation, containerized, and characterized for proper disposal. Solidification of oversaturated soils will be completed prior to transport, if needed.

3.3 Confirmation/Characterization Sampling

The proposed post-excavation soil sampling methodology is described in the sections below. Additional detail is found in the SAP included in Appendix A.

Apex will characterize the residual soil conditions in the excavation cavity through collection of representative grab samples from the excavator bucket. Three discrete samples will be collected per sub-decision unit for a total of 12 samples (except that samples from each sub-unit to be analyzed for dioxins will be composited, resulting in a total of four dioxin samples). Upon soil retrieval, Apex will conduct the following: field screening (described in Appendix A) and soil logging in accordance with the Unified Soil Classification System (USCS) to record soil texture, grain size, etc. using appropriate personal protective equipment (PPE) as required in the HASP in Appendix C. All samples will be stored in a chilled container for transport via chain-of-custody to Pace Analytical (Oregon Price Agreement #8903) for analysis.

Each of the soil samples will be analyzed for the following analytes:

- Diesel- and oil-range total petroleum hydrocarbons (TPH-Dx) by Method NWTPH-Dx with silica gel cleanup;
- Dioxins by EPA Method 8290 (an assumed total of four three-point composite samples, one from each of the sub-decision units being excavated);
- Select metals (Resource Conservation and Recovery Act [RCRA] 8, plus copper, zinc, and nickel) by EPA Method 6010; and

- Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270SIM.

Quality assurance/quality control (QA/QC) procedures will be used throughout this project. The SAP in Appendix A includes the QA plan for the project. The plan includes sampling and custody procedures, QA sampling analysis, detection limit goals, field QC, laboratory QC, and QA reporting.

3.4 Backfilling and Site Restoration

The subcontractor will backfill excavations with approximately 885 cubic yards of clean, imported topsoil to match the surrounding surface grade. All imported backfill material will comply with ODOT specification 0140.14.

Following the placement of the excavation backfill, the disturbed area will be hydroseeded with Pacific Northwest erosion control seed blend (amended to also include mycorrhizae, straw mulch with tackifier, fertilizer, and sterile wheat grass in order to improve erosion control and germination). Because there is no service for watering, it is expected that the survival rate for the grasses will be limited, and no separate guarantee is provided. The hydroseeding amendments discussed above are included based on recommendations and experience at other areas in order to improve the survivability of the seeded areas.

4.0 Deliverables and Proposed Schedule

4.1 Deliverables

Following completion of the CWP, Apex will prepare a Cleanup Action summary report that details the excavation and site restoration activities and briefly discusses the magnitude and extent of residual contamination in the excavation cavity. Data from this work (the confirmation soil samples) and from the April 2024 supplemental site investigation will be screened against applicable DEQ RBCs to assess whether additional institutional or engineering controls are recommended to prevent unacceptable risk to human health or ecological receptors.

The summary cleanup report will be prepared in general accordance with the following outline:

1. Introduction
    a. Purpose
    b. Scope of Work
    c. Limitations
2. Background
    a. Site Location and Description (includes Site maps)

b. Geology and Hydrogeology

3. Field Activities
4. Chemical Analysis and Investigation Results
    a. Analyses Performed
    b. Chemical Results
5. Risk-Based Screening
6. Conclusions and Recommendations
7. Appendices (as applicable)
    a. Backup Documentation and Field Notes (e.g., photographs, Apex field notes, contractor field notes, applicable licenses, permits, proof of training, etc.)
    b. Historical Site Investigation Data (SSI)
    c. Analytical Laboratory Testing Program and Documentation (including a QA review)
    d. Disposal and Waste Manifests and Receipts

A draft of the report will be submitted to DEQ for review. Following DEQ review and comment, the report will be revised, and a final version will be submitted to DEQ.

4.2 Schedule

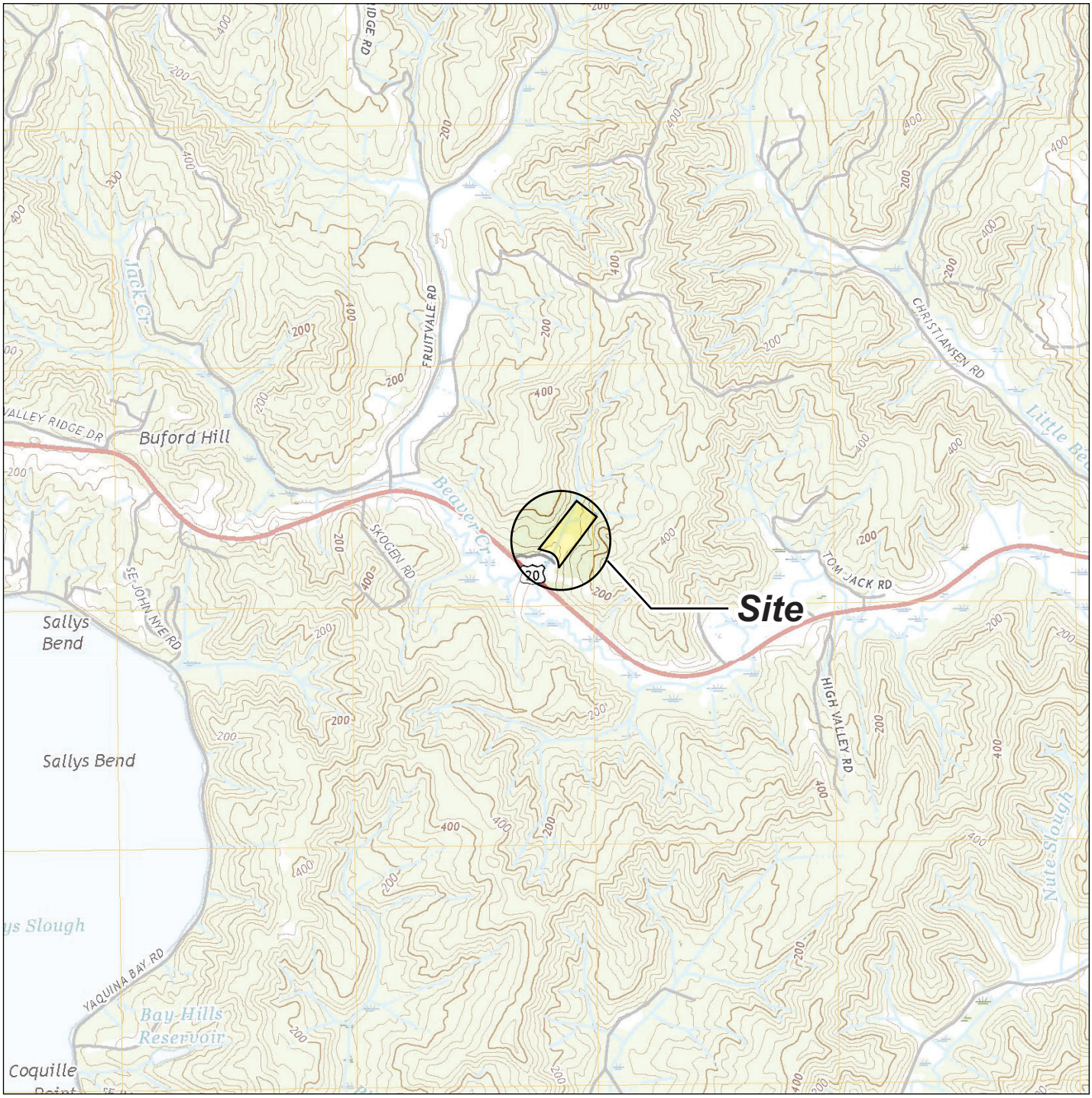
It is anticipated that this work will be completed in the fall of 2024 (prior to the arrival of the wet season), preceded by the subcontractor procurement, cultural resources consultation, and utility locating. The work is expected to be completed within two weeks of initiation, and the cleanup summary report will be submitted within two weeks of receipt of all disposal documentation from the subcontractor and analytical reports from the laboratory.

5.0 References

Apex Companies, LLC (Apex), 2024a. *Apex Analysis of Brownfield Cleanup Alternatives (ABCA) – Report Update – Former King Salvage Site (ECSI No. 2751)*. June 27, 2024.

Apex, 2024b. *King Salvage (Former) Site, April 2024 Supplemental Site Investigation Memorandum*. June 26, 2024.

City of Toledo, 2017. *Water Master Plan Update*. February 2017.



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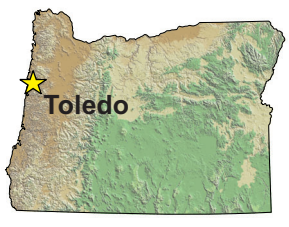

0 2,000 4,000

Approximate Scale in Feet

Site Location Map

Revised Analysis of Brownfield Cleanup Alternatives
Former DEQ King Salvage Site - 109 King Place
Toledo, Oregon

Apex Companies, LLC 15618 SW 72nd Avenue Tigard, Oregon 97224	Project Number: 32-23010077	Drawn: JP	Approved: MWS	Figure 1
	August 2024			

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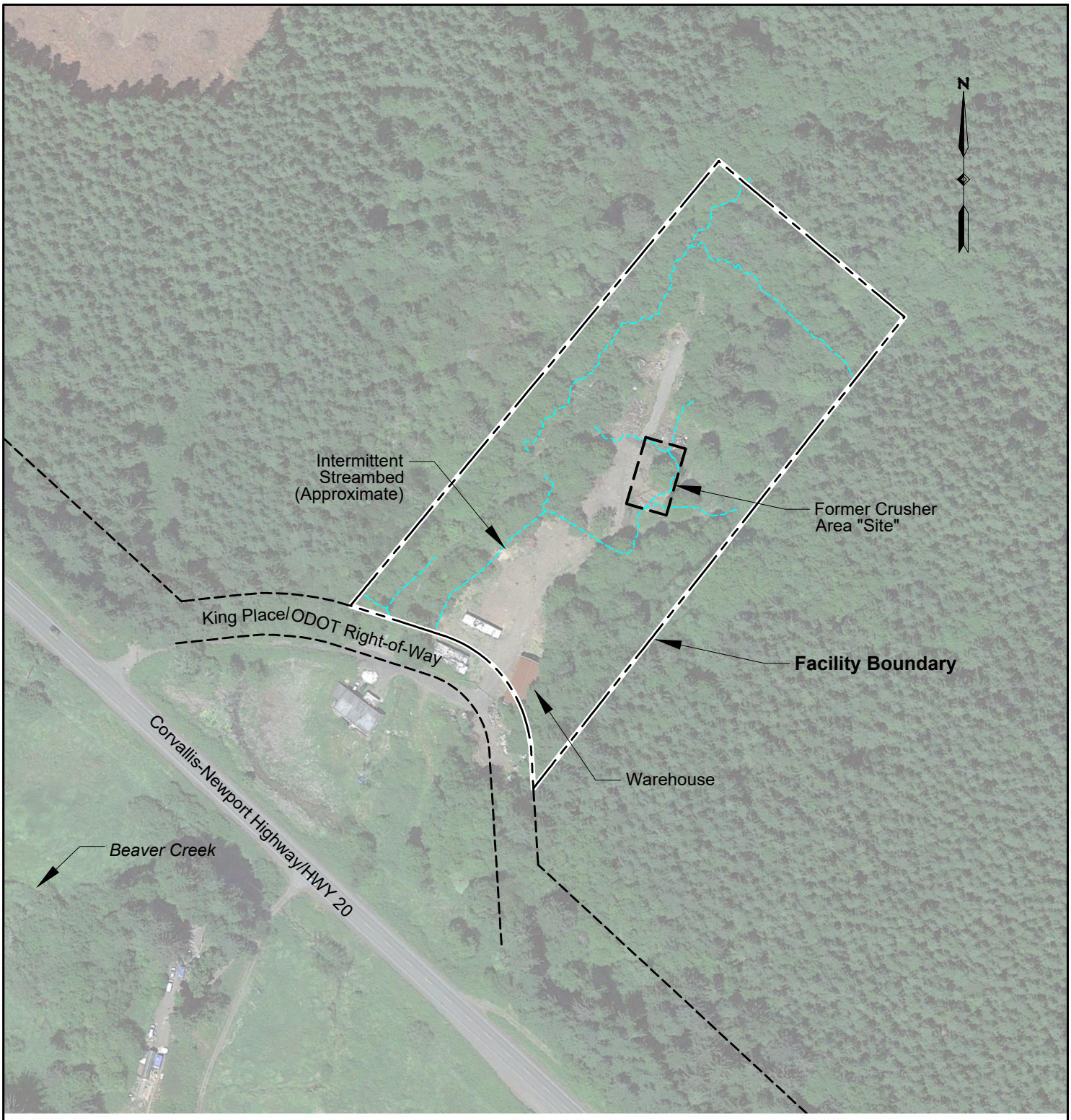

NOTE: Base map prepared from Google Earth Pro Imagery. Aerial dated September 24, 2019. Tax Lot lines are approximate.

0 200 400

Scale in Feet

Site Plan

Revised Analysis of Brownfield Cleanup Alternatives
Former DEQ King Salvage Site - 109 King Place
Toledo, Oregon

Apex Companies, LLC
15618 SW 72nd Avenue
Tigard, Oregon 97224

Project Number:	Drawn:	Approved:
32-23010077	JP	MWS

August 2024

Figure **2**

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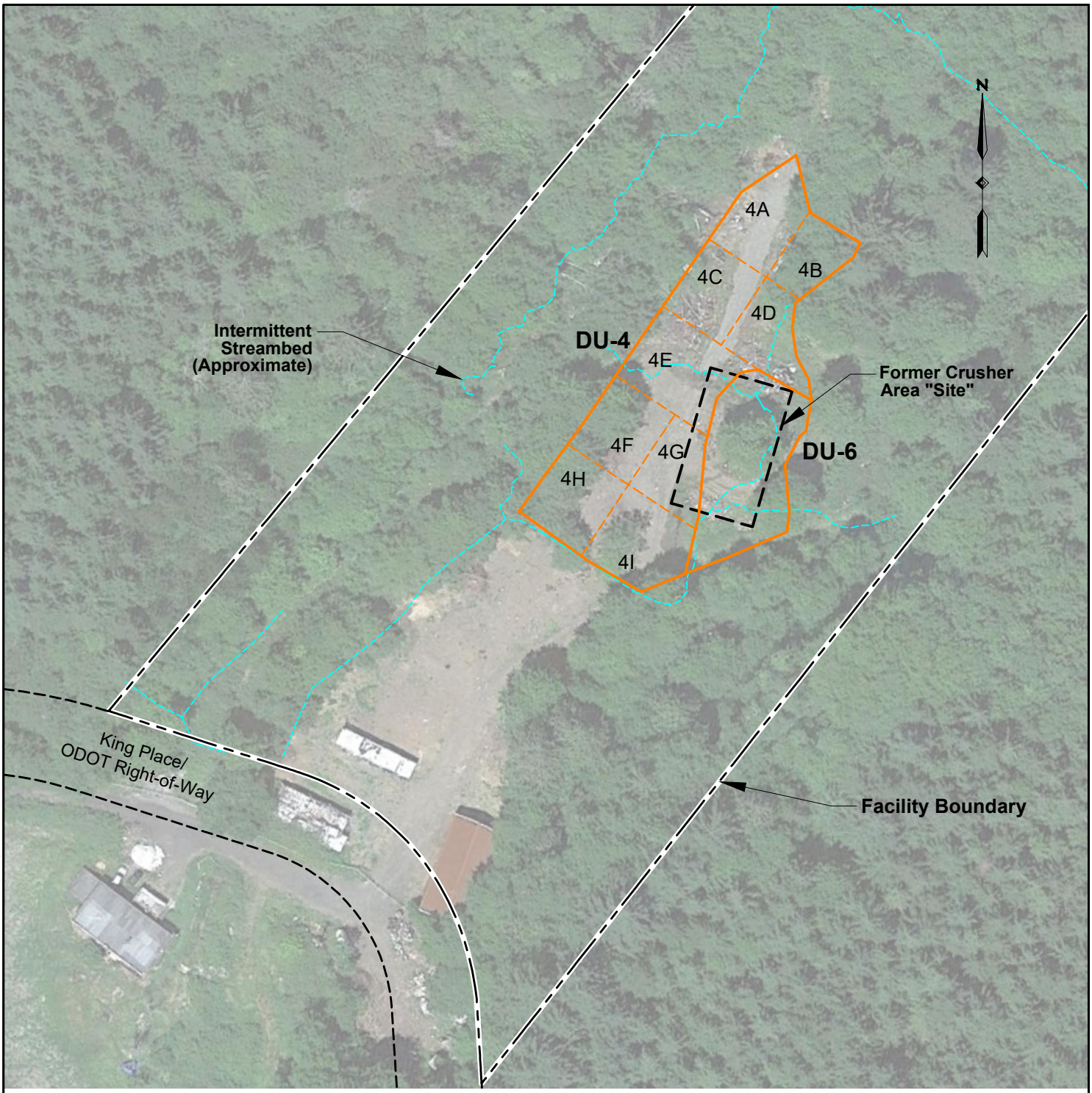

NOTE: Base map prepared from Google Earth Pro Imagery. Tax Lot lines are approximate.

Legend:

DU-4 Decision Unit Boundary and Designation

4A Subunit Boundary and Designation

0 100 200

Scale in Feet

Decision Units

Revised Analysis of Brownfield Cleanup Alternatives
Former DEQ King Salvage Site - 109 King Place
Toledo, Oregon

Apex Companies, LLC
15618 SW 72nd Avenue
Tigard, Oregon 97224

Project Number:	Drawn:	Approved:	Figure
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August 2024			

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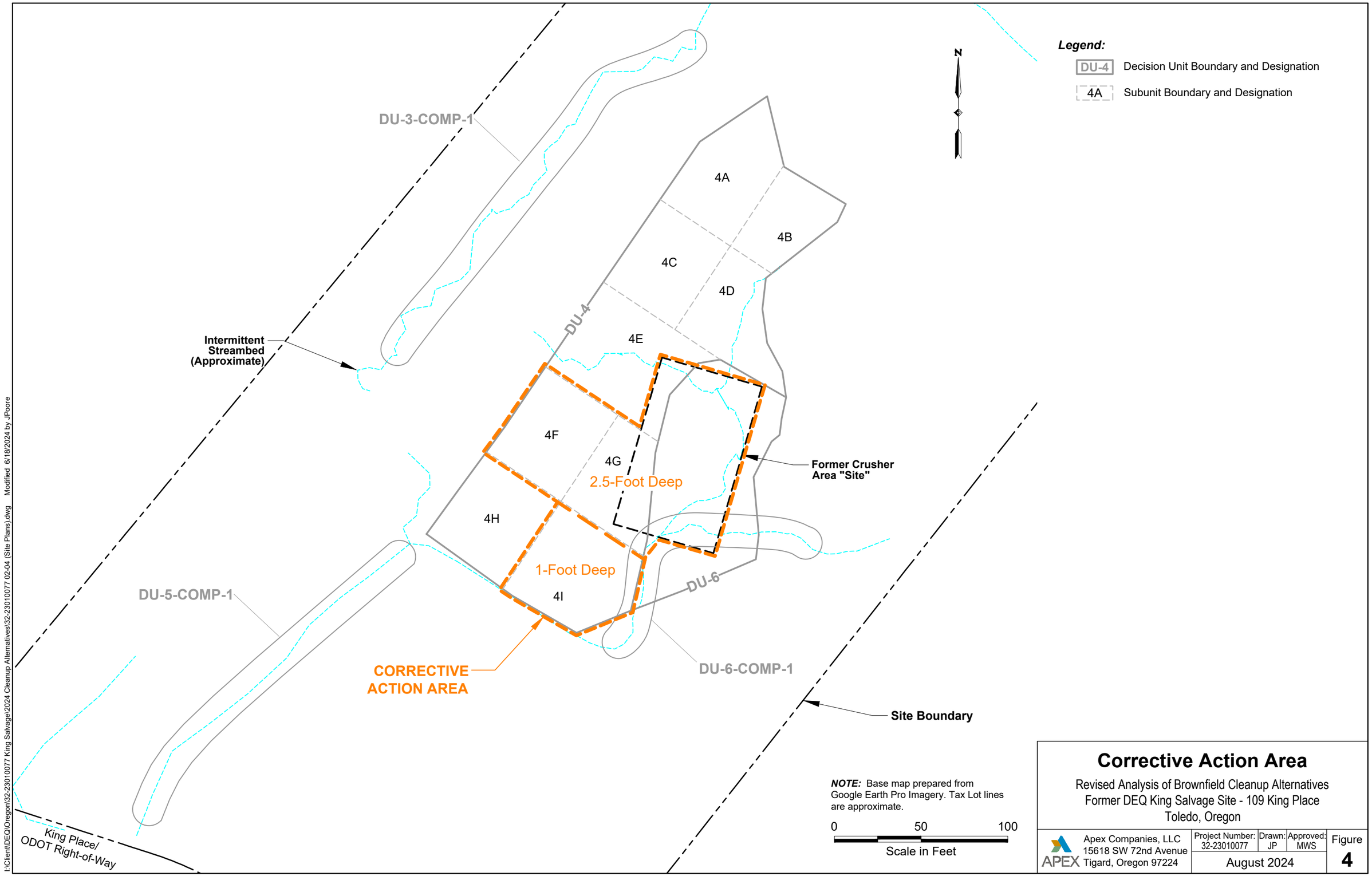

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NOTE: Base map prepared from Google Earth Pro Imagery. Tax Lot lines are approximate.

0 50 100

Scale in Feet

Corrective Action Area

Revised Analysis of Brownfield Cleanup Alternatives
Former DEQ King Salvage Site - 109 King Place
Toledo, Oregon

Apex Companies, LLC
15618 SW 72nd Avenue
Tigard, Oregon 97224

Project Number:	Drawn:	Approved:	Figure
32-23010077	JP	MWS	4

August 2024

Appendix A

Sampling and Analysis Plan (SAP)

1.0 Introduction

This appendix presents the sampling and analysis plan (SAP) for field and sampling procedures and the analytical testing program that will be used to complete the field and analytical work for the post-excavation soil sampling activities proposed at the King Salvage property (ECSI #2751) located at 109 King Place in Toledo, Oregon (the Site).

Quality assurance and quality control (QA/QC) procedures discussed in this appendix are consistent with the QA/QC requirements outlined in the Oregon Department of Environmental Quality (DEQ) *Quality Assurance Project Plan for Preliminary Assessment/Site Investigations* (dated December 2017), and DEQ's *Risk-Based Decision Making for Remediation of Contaminated Sites* (dated September 22, 2003).

2.0 Field and Sampling Procedures

The scope of work (SOW) includes collecting soil samples from the excavation cavities and sidewalls. Data from these activities will be used to characterize the soil conditions following removal of contaminated soils in sub-decision units DU-4G, DU-4H, DU-4I and DU-6.

The field and sampling procedures include the following:

- Following excavation, collection of three discrete samples from each of the four sub-decision units included in the corrective action area (DU-4G, DU-4H, DU-4I and DU-6);
- Sample management (e.g., containers, storage, and shipment); and
- Decontamination procedures.

2.1 Preparatory Activities

Site Health and Safety Plan. A Site-specific health and safety plan (HASP) has been prepared for the proposed activities at the Site. The Site Investigation (SI) Work Plan includes a copy of the HASP in Appendix E. The HASP was prepared in general accordance with the Occupational Safety and Health Administration (OSHA) and the Oregon Administrative Rules (OAR). A copy of the HASP will be maintained on-site during the field activities.

Property Access. It is our understanding that the DEQ has obtained access rights to the Site in order to conduct the proposed work. Apex will coordinate the investigation schedule directly with the County for access to the Site.

Subcontractor Procurement. Subcontracted services that will be required to complete this work will include excavation services and laboratory services. Laboratory services will be provided by Pace Analytical under their Price Agreement with the State of Oregon (#8903). Excavation services will be procured via the distribution of procurement documents that will be provided to DEQ for review. Waste transportation and disposal will be completed by Dahl Disposal as Lincoln County's franchise waste hauler, as coordinated by the selected excavation subcontractor.

Underground Utility Location. Public utilities will be located using the Oregon One Call notification system. Apex has confirmed in previous surveys that there are no public or private utilities in the corrective action area.

2.2 Site Soil Sampling Activities

Apex will collect three discrete soil samples from each of the four sub-decision units in the corrective action area, for a total of 12 samples (except that the samples for dioxins will be composited to one sample per sub-unit). Field and sampling procedures for soil sampling activities at the Site are discussed below.

Samples will be collected from selected locations on excavation sidewalls or floors to characterize residual Site conditions following soil removal. Samples will be collected using hand tools or as grab samples from the excavator bucket. The sample containers will be labeled and placed into a chilled ice chest for transport to the laboratory.

2.3 Equipment List

The following general equipment will be required during collection procedures:

- Personal protective equipment as required by the project HASP;
- Site maps;
- Appropriate sampling device (hand tools);
- Decontamination detergent such as Alconox®;
- Camera; and
- Field notebook.

2.4 Soil Sampling Methodology

A total of 12 discrete samples will be collected from the excavation cavity sidewalls and floor at intervals spaced across the corrective action area. Three samples will be collected in each of the four sub-decision units included in the corrective action area (DU-4G, DU-4H, DU-4I, DU-6).

Soil samples will be collected in accordance with Apex's standard operating procedures (SOP) nos. 2.2, "Surface Soil Sampling Procedures," and 2.4, "Push-Probe Exploration Procedures," as applicable and the dioxin samples will be composited as described in SOP 2.4. SOPs are included in this appendix.

2.4.1 Field Screening

Apex staff will perform field screening of soil encountered during the investigation in accordance with SOP 2.1, "Standard Field Screening Procedures." These methods are described in general below.

Photoionization Detector. The photoionization detector (PID) is generally used to detect benzene, toluene, ethylbenzene, and xylenes (collectively called BTEX) and high concentration chlorinated volatile organic compounds (VOCs). During operation, the sample stream flows through the detector's reaction chamber where it is continuously irradiated with high energy ultraviolet light. When compounds are present that have a lower ionization potential than that of the irradiation energy (10.2 electron volts with standard lamp), they are ionized. The ions formed are collected in an electrical field, producing an ion current that is proportional to compound concentration.

Sheen Test. Following PID screening, a sheen test will be performed by placing approximately one ounce of freshly exposed, uncompacted soil into a clean glass jar or stainless-steel bowl. Enough water will be added to cover the sample and Apex staff will observe the water surface for signs of discoloration/sheen. Observations will be recorded on the soil boring log.

2.5 Sample Location Control

The horizontal locations of the excavation grab samples will be recorded using a high-accuracy, handheld global positioning system (GPS) device. If explorations are not accessible with the GPS device, the locations will be measured to permanent Site features (Site boundaries or distinct topographic features).

2.6 Sample Management

Soil. Samples to be analyzed for dioxins will be collected as three-point composite samples from each of the four excavation sub-areas. Discrete and composite soil samples will be collected using clean stainless-steel hand tools. The soil will be placed in new laboratory-provided glass jars with Teflon™ lids. The sample(s) will then be placed in a chilled container in preparation for transport to an accredited laboratory for analysis. Apex will generally conduct soil sampling as instructed within Apex's SOP No. 2.2, "Surface Soil Sampling Procedures," to ensure accurate representation of Site conditions during the time of the sampling, modified as appropriate to collect the excavation confirmation samples from the excavator bucket.

Labeling Requirements. A sample label will be affixed to each sample container with a unique alphanumeric identifier. Containers will be marked with the project number, a sample number, date of collection, and the sampler's initials.

Sample Storage and Shipment. Soil/sediment samples will be stored in a cooler chilled with ice or blue ice to 4 ± 2 degrees Celsius. The cooler lid will be sealed with chain-of-custody seals. Samples will be submitted under chain-of-custody documentation via overnight courier to the accredited laboratory Pace Analytical (Oregon Price Agreement #8903) for chemical analysis.

2.7 Decontamination Procedures

Personnel decontamination procedures depend on the level of protection specified for a given activity. The HASP (Appendix C of the Cleanup Work Plan) identifies the appropriate level of protection for the type of work and expected field conditions involved in this project. In general, clothing and other protective equipment can be removed from the investigation area. Field personnel should thoroughly wash their hands and faces at the end of each day and before taking any work breaks. Sampling equipment will be provided clean from the laboratory and will not be reused at the Site. Stainless-steel bowls and spoons used to homogenize soils will be decontaminated with an Alconox® solution between sample composites.

2.8 Handling of Investigation-Derived Waste

Investigation-derived waste (IDW) will consist of personal protective equipment (PPE) used during oversight of the cleanup action and collection of confirmation soil samples. IDW will be disposed of as solid waste.

3.0 Analytical Testing Program

Chemical analyses of soils collected from excavation cavities will be performed to assess whether an unacceptable risk to the environment, ecological species, or human health may be present at the Site following the cleanup action. Analytical laboratory QC procedures are discussed in Section 5.0.

The proposed analytical methods and anticipated number of samples are described below. Samples will be collected and handled using methods described in Section 2 of this SAP. Specific container and storage requirements for samples will be discussed with the analytical laboratory prior to sample collection.

Soil Samples. For the purposes of developing the laboratory budget, we have assumed that each of the collected soil samples will be selected for analysis. One sample location will be randomly selected for duplicate analysis, for a total of 13 soil samples. Collected soil samples will be analyzed for the following analytes:

- Diesel- and oil-range total petroleum hydrocarbons (TPH-Dx) by Method NWTPH-Dx with silica gel cleanup;
- Dioxins by U.S. Environmental Protection Agency (EPA) Method 8290 (one three-point composite sample collected from each of the four excavation sub-areas);
- Select metals (Resource Conservation and Recovery Act [RCRA] 8, plus copper, zinc, and nickel) by EPA Method 6010; and
- Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270SIM.

4.0 Field Quality Assurance Program

Field Chain of Custody. A chain-of-custody form will be used to record possession of a sample and to document analyses requested. Each time the samples are transferred between individuals, both the sender and receiver sign and date the chain-of-custody form. When a sample shipment is transported to the laboratory, a copy of the chain-of-custody form is included in the transport container (e.g., ice chest).

Field Duplicates. A total of one field duplicate will be collected during this sampling event. The field duplicate will be analyzed by the same analytical methods used for primary samples. Relative percent difference (RPD) for field duplicates will be calculated to assess the data precision, accuracy, and potential variability caused by sample handling.

5.0 Laboratory Quality Control

The laboratory maintains an internal QC program as documented in its laboratory QC manual. The laboratory uses a combination of blanks, surrogate recoveries, duplicates, matrix spike recoveries, matrix spike duplicate recoveries, blank spike recoveries, and blank spike duplicate recoveries to evaluate the analytical results. The laboratory also uses data quality goals for individual chemicals or groups of chemicals based on the long-term performance of the test methods.

1. PURPOSE AND SCOPE

This Standard Operating Procedure (SOP) provides instructions for standard field screening. Field screening results are used to aid in the selection of soil samples for chemical analysis. This procedure is applicable during Apex Companies, LLC (Apex) soil sampling operations.

Standard field screening techniques include the use of a photoionization detector (PID) to assess for volatile organic compounds (VOCs), for the presence of separate-phase petroleum hydrocarbons using a sheen test. These methods will not detect all potential contaminants, so selection of screening techniques shall be based on an understanding of the site history. The PID is not compound or concentration-specific, but it can provide a qualitative indication of the presence of VOCs. PID measurements are affected by other field parameters such as temperature and soil moisture. Other field screening methods, such as screening for dense non-aqueous phase liquid (DNAPL) using dye or UV light, are not considered "standard" and will be detailed in the site-specific sampling and analysis plan (SAP).

2. EQUIPMENT AND MATERIALS

The following materials are necessary for this procedure:

- PID with calibration gas (record daily calibration/calibration check in field notes);
- Plastic resealable bags (for PID measurement); and
- Glass jars or stainless steel bowls (for sheen testing).

3. METHODOLOGY

Each soil sample will be field screened for VOCs using a PID and for the presence of separate-phase petroleum hydrocarbons using a sheen test. If the presence of DNAPL is suspected, then screening using dye and UV light may also to be completed. For information regarding screening using dye or UV light, refer to the site specific sampling and analysis plan.

PID lamps come in multiple sizes, typically 9.8, 10.6, and 11.7 electron volts (eV). The eV rating for the lamp must be greater than the ionization potential (in eV) of a compound in order for the PID to detect the compound. For petroleum hydrocarbons, a lamp of at least 9.8 eV should be used. For typical chlorinated alkenes (dichloroethene, trichloroethene, tetrachloroethene, or vinyl chloride.), a lamp of at least 10.6 eV should be used. The compatibility of the lamp size with the site constituents should be verified prior to the field event and will be detailed in the site-specific SAP.

PID Calibration Procedure: The PID used on-site should be calibrated daily or more frequently if needed. Calibration of the PID should be documented in field notes. Calibrations procedures should be conducted according to the manufacturer's instructions. .

<u>PID Screening Procedure:</u>

- Place a representative portion (approximately one ounce) of freshly exposed, uncompacted soil into a clean resealable plastic bag.
- Seal the bag and break up the soil to expose vapors from the soil matrix.
- Allow the bag to sit to reach ambient temperature. Note: Ambient temperature and weather conditions/humidity should be recorded in field notes. Changes in ambient temperature and weather during the field work should also be recorded, as temperature and humidity can affect PID readings.
- Carefully insert the intake port of the PID into the plastic bag.
- Record the PID measurement in the field notes or boring logs.

<u>Sheen Test Procedure:</u>

- Following the PID screen, place approximately one ounce of freshly exposed, uncompacted soil into a clean glass jar or stainless steel bowl.

- Add enough water to cover the sample.
- Observe the water surface for signs of discoloration/sheen and characterize

No Sheen (NS)	No visible sheen on the water surface
Biogenic Film (BF)	Dull, platy/blocky or foamy film.
Slight Sheen (SS)	Light sheen with irregular spread, not rapid. May have small spots of color/iridescence. Majority of water surface not covered by sheen.
Moderate Sheen (MS)	Medium to heavy coverage, some color/iridescence, spread is irregular to flowing. Sheen covering a large portion of water surface.
Heavy Sheen (HS)	Heavy sheen coverage with color/iridescence, spread is rapid, entire water surface covered with sheen. Separate-phase hydrocarbons may be evident during sheen test.

1. PURPOSE AND SCOPE

This Standard Operating Procedure (SOP) describes the methods used for obtaining surface soil samples for physical and/or chemical analysis. For purposes of this SOP, surface soil (including shallow subsurface soil) is loosely defined as soil that is present within 3 feet of the ground surface at the time of sampling. Various types of sampling equipment are used to collect surface soil samples including spoons, scoops, trowels, shovels, and hand augers.

2. EQUIPMENT AND MATERIALS

The following materials are necessary for this procedure:

- Spoons, scoops, trowels, shovels, and/or hand augers. Stainless steel is preferred.
- Stainless steel bowls
- Laboratory-supplied sample containers
- Field documentation materials
- Decontamination materials
- Personal protective equipment (as required by Health and Safety Plan)

3. METHODOLOGY

Project-specific requirements will generally dictate the preferred type of sampling equipment used at a particular site. The following parameters should be considered: sampling depth, soil density, soil moisture, use of analyses (e.g., chemical versus physical testing), type of analyses (e.g., volatile versus non-volatile). Analytical testing requirements will indicate sample volume requirements that also will influence the selection of the appropriate type of sampling tool. The project sampling plan should define the specific requirements for collection of surface soil samples at a particular site.

Collection of Samples

- **Volatile Analyses.** Surface soil sampling for volatile organics analysis (VOA) is different than other routine physical or chemical testing because of the potential loss of volatiles during sampling. To limit volatile loss, the soil sample must be obtained as quickly and as directly as possible. If a VOA sample is to collected as part of a multiple analyte sample, the VOA sample portion will be obtained first. The VOA sample should be obtained from a discrete portion of the entire collected sample and should not be composited or homogenized. Sample bottles should be filled to capacity, with no headspace. Specific procedures for collecting VOA samples using the EPA Method 5035 are discussed in SOP 2-7.
- **Other Analyses.** Once the targeted sample interval has been collected, the soil sample will be thoroughly homogenized in a stainless steel bowl prior to bottling. Sample homogenizing is accomplished by manually mixing the entire soil sample in the stainless steel bowl with the sampling tool or with a clean teaspoon or spatula until a uniform mixture is achieved. If packing of the samples into the bottles is necessary, a clean stainless steel teaspoon or spatula may be used.

General Sampling Procedure:

- Decontaminate sampling equipment in accordance with the Sampling and Analysis Plan (SAP) before and after each individual soil sample.
- Remove surface debris that blocks access to the actual soil surface or loosen dense surface soils, such as those encountered in heavy traffic areas. If sampling equipment is used to remove surface debris,

the equipment should be decontaminated prior to sampling to reduce the potential for sample interferences.

- When using a hand auger, push and rotate downward until the auger becomes filled with soil. Usually a 6- to 12-inch long core of soil is obtained each time the auger is inserted. Once filled, remove the auger from the ground and empty into a stainless steel bowl. If a VOA sample is required, the sample should be taken directly from the auger using a teaspoon or spatula and/or directly filling the sample container from the auger. Repeat the augering process until the desired sample interval has been augered and placed into the stainless steel bowl.

Backfilling Sample Locations:

Backfill in accordance with federal and state regulations including OAR 690-240 (e.g., bentonite requirements). The soils from the excavation will be used as backfill unless project-specific or state requirements include the use of clean backfill material.

Appendix B

Inadvertent Discovery Plan – King Salvage (dated November 12, 2020)

MEMORANDUM

Date: November 12, 2020

To: Ms. Nancy Sawka, Mr. Craig Jacobsen

From: Mike Stevens, Apex Companies, LLC

Re: Inadvertent Discovery Plan
King Salvage Property
109 King Place, Toledo, Oregon
2604-00

Apex Companies, LLC (Apex) prepared this memorandum to provide protocols if cultural resources are encountered during planned solid and hazardous waste removal activities on the King Salvage Property, located at 109 King Place in Toledo, Oregon (Site; Figure 1).

In preparation of a Phase II Environmental Site Assessment, Stantec Consulting Services Inc. (Stantec) submitted a National Historic Preservation Act and Tribal Consultations Letter to the U.S. Environmental Protection Agency (EPA), dated August 1, 2019. In this letter, Oregon State Historic Preservation Office (SHPO) and Oregon federally-recognized tribes were consulted regarding the proposed Phase II scope of work. Responses received from SHPO and Oregon tribes expressed no archeological concerns and no concerns with the project. A copy of the letter from Stantec to EPA is included in Attachment A.

The following sections provide a brief background on Site history and the proposed environmental work, a summary of historical ground disturbance events, and a summary of characteristics based on the prior environmental assessment of the Site. This memorandum also contains a proposed Cultural Resources Inadvertent Discovery Protocol for identification and proper response in the event that cultural resources are encountered.

SITE DEVELOPMENT AND USE HISTORY

The Site is located at 109 King Place, adjacent to Highway 20 in Lincoln County between the towns of Toledo and Newport, Oregon. The Site is split into two tax lots with different zoning. The tax lots are separated by King Place road. The property located north of King Place road (referred to herein as the "north" parcel; tax lot 11-11-11-00-00901-00) is 6.56 acres and is zoned for timber conservation and associated with the operations of King Salvage Company. The property located south of King Place and adjacent to Highway 20 (referred to herein as the "south" parcel; tax lot 01000-00) is 1.68 acres and zoned for agricultural conservation and is associated with the former residence of former property owners Mr. and Mrs. Mobley. The former Mobley residence is developed with a two-story residential dwelling and attached deck and carport. The south lot is not considered part of the Site, as the solid waste to be removed is limited to the north lot.

The north parcel is developed with the following features: a general purpose building that was used as the office for the automobile salvage operation; a former office building; an automobile crushing machine located in the central northwest side of the salvage yard; and an above ground storage tank (AST) with a capacity of approximately 100 gallons diesel. The King Salvage parcel was used for the automobile salvage operation and contains numerous vehicles in various stages of deconstruction, including trucks, busses, light automobiles, recreational camper trailers, and motor homes; stockpiled appliances and refrigerators; stockpiled automobile and truck tires; a burn barrel/tank; debris and waste piles; several heating fuel ASTs; and numerous unlabeled 55-gallon, 5-gallon, and less than 5-gallon containers in various conditions and volume levels.

Aerial photographs from 1939, 1954, 1965, 1973, 1978, 1982, 1986, 1994, 2001, and 2005 were reviewed. Based on review of the photographs and statements from the former property owner, Mr. Mobley, the Site was developed in 1939 with two buildings that appear to be for residential use. A small amount of debris was observed on the north parcel in this aerial photograph. In the 1965 aerial photograph, three new buildings were observed at the Site, including the two-story residential structure located on the south parcel. A small amount of debris was observed along with areas cleared of vegetation on the north parcel. Lincoln County tax records indicate the residential structure was built in 1963. By the late 1970s, a significant amount of debris was observed on the north parcel. Based on the aerial photographs and information from Mr. Mobley, salvage operations began in the late 1960s to early 1970s. Mr. Robert Mobley purchased both tax lots in the 1980s and operated the salvage yard for over 30 years. In August 2017, Lincoln County obtained the Site through tax foreclosure.

Oregon Department of Environmental Quality (DEQ) initially became aware of the Site through a pollution complaint filed in 2000 by the Oregon Department of Transportation (ODOT). ODOT reported oil migrating from the Site to an unnamed creek that runs through the Site. DEQ did not observe impacts to surface water during their inspection but observed releases of hazardous substances to on-site soils and large amounts of accumulated solid waste. Between 2000 and 2010, DEQ conducted several site inspections and had numerous interactions with Mr. and Mrs. Mobley regarding violations at King Salvage Co. These violations included storing solid waste and waste tires without a permit, spills and releases of hazardous substances to the ground surface, illegal open burning of prohibited materials, and other violations. DEQ issued several Notices of Class I Violations and fines. The United States Environmental Protection Agency (EPA) conducted a Time Critical Removal at the Site in 2009. TechLaw, Inc. (TechLaw), on behalf of the EPA, removed 500 tons of contaminated soil from around the car crusher equipment and road surface and removed approximately 50 55-gallon drums of used oil. TechLaw summarized the field activities, sampling activities, results and conclusions in a Removal Evaluation Report dated April 24, 2009 (TechLaw, 2009). No archeological artifacts were reported to be observed during the soil removal effort. Since Lincoln County took ownership of the Site in 2017, subsequent removal of solid waste has been conducted but large quantities of solid waste remain, and the full extent of contamination is unknown.

Given the historical soil removal actions conducted at the Site and that the anticipated sub-surface disturbances are limited, it is unlikely that archeological artifacts are present and/or will be encountered during the proposed solid and hazardous waste removal activities. Proposed activities include removal of solid and hazardous wastes with heavy equipment, creation of a staging area for sorting and staging, and off-site disposal of wastes.

SOIL CHARACTERISTICS

Soils encountered during the 2009 EPA Time Critical Removal event consisted primarily of clay to sandy clay. The Removal Evaluation Report (TechLaw, 2009) interpreted the matrices to be native material but were frequently comingled with gravel debris and oily residue. Nearby monitoring well installation logs from the Oregon Water Resource Department (OWRD) are consistent with soils observed during the EPA Removal event: generally described as light brown to dark brown clay and sandy clay to approximately 25 feet below the ground surface (bgs).

CULTURAL RESOURCES INADVERTENT DISCOVERY PROGRAM

This section addresses the coordination protocol in the event of a discovery of a cultural resource during the proposed sub-surface activities. Coordination is necessary in order to:

- Protect cultural resources that are significant to local tribes or may be eligible for the National Register; and
- Develop a plan to proceed with the environmental investigation while avoiding and minimizing impacts to cultural resources.

When to Stop Work

In the event that construction work may uncover previously unidentified Native American artifacts, work shall cease immediately. Native American artifacts and/or features that may be encountered include, but are not limited to:

- Flaked stone tools (arrowheads, knives, scrapers etc.);
- Waste flakes that resulted from the production of flakes stone tools;
- Ground stone tools (manos, metals, mortars and pestles);
- Layers (strata) of discolored earth resulting from fire hearths. These layers may be black, red, or mottled brown and often contain discolored cracked rocks or dark soil with charcoal;
- An accumulation of shells, burned rocks, or other food related materials;
- Clusters of tin cans or bottles, logging or agricultural equipment that appear to be older than 50 years;
- Buried railroad tracks, decking, or other industrial materials;
- Human remains; and
- Structural remains, such as rings of rocks or round-shaped depressions in the ground surface or underground depressions seen in exposed strata.

Coordination in the Event of Inadvertent Discovery

In the event of an inadvertent discovery of possible archaeological materials, the Project Lead shall adhere to the following protocols:

1. All work will stop immediately in the vicinity of the find;
2. The discovery area and a surrounding buffer zone (radius of approximately 50-feet) shall be delineated with flags or other sufficient markers;
3. The Project Lead shall make notifications to the following representatives:

AGENCY	PERSONNEL	CONTACT INFORMATION
Oregon SHPO, State Archeologist	Dennis Griffin	(503) 986-0674
Oregon Cascades West Council of Governments	Jeff Gepper	(541) 924-8430
Stantec (Professional Archeologist)	Leonard Farr	(971) 230-5204
OR Commission on Indian Services (CIS)	Mitch Sparks	(503) 986-1067
Confederated Tribes of Siletz	Robert Kentta Peter Hatch	(541) 351-0148 rkentta@ctsi.nsn.us peterh@ctsi.nsn.us
Confederated Tribes of Grand Ronde	Briece Edwards (Human Remains) Chris Bailey (All Other Discoveries)	(503) 879-2084 (503) 879-1675
Cow Creek Band of Umpqua Tribe of Indians	Jessie Plueard	(541) 677-5575

If possible human remains are encountered, the Oregon State Police will also be notified.

AGENCY	PERSONNEL	CONTACT INFORMATION
Oregon State Police	Chris Allori	(503) 731-4717

The consulting archaeologist shall make a preliminary assessment of whether the cultural material or site is potentially significant and recommend additional steps to mitigate effects. The assessment and recommendation will be communicated to Oregon SHPO and the Tribe's concurrence will be obtained prior to resuming any ground-disturbance activities. No work at the discovery location may resume until SHPO or tribal archaeology personnel have assessed the situation and are in agreement with the mitigation plan (if required). The discovery site will be secured and protected until the project resumes.

If human remains are encountered, the remains will be treated with dignity and respected at all times. The remains will be covered with a tarp or other materials (not soil or rocks) for temporary protection in place and to shield them from being photographed. Do not call 911. Inquiries from the media or interested parties will be referred to the Project Lead. The Oregon SPHO, Oregon State Police, Oregon's legislative CIS, and appropriate tribal governments will determine an appropriate course of action. Additional archaeological excavations may be required and would be handled in coordination with the parties previously listed.

CONCLUSION

Documents reviewed herein indicate that areas of the Site have been historically disturbed by prior building construction, grading, and contaminated soil removal actions. In addition, consultation by Stantec with the Oregon SPHO and interested Oregon Tribes concluded with no expressed concerns for the investigation area. These considerations suggest the potential for encountering cultural resources is low and the development of Cultural Resource Inadvertent Discovery Protocol is appropriate for the Site conditions.

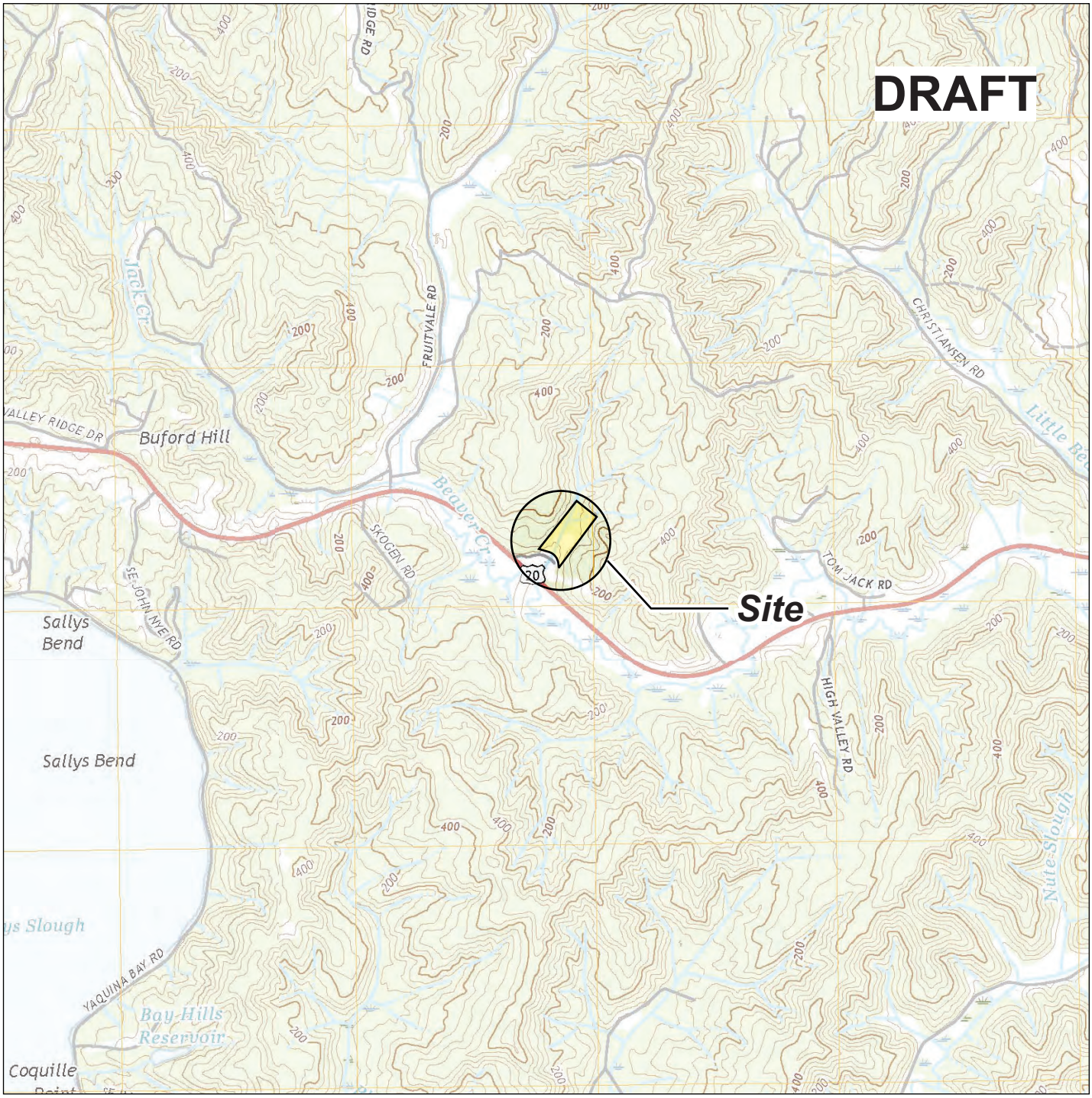
REFERENCES

TechLaw, Inc., 2009. *King Salvage Removal Assessment, Removal Evaluation Report, Revision 0.* April 24, 2009.

ENCLOSED

Figure G-1 – Site Location Map
Figure G-2 – Site Vicinity Map

Attachment A – National Historic Preservation Act and Tribal Consultations Letter (Stantec, 2019)



Note: Base map prepared from USGS 7.5-minute quadrangles of Newport North and South and Toledo North and South, OR, dated 2020 as provided by USGS.gov.

0 2,000 4,000

Approximate Scale in Feet

Site Location Map

Work Plan
DEQ King Salvage Site - 109 King Place
Toledo, Oregon

Apex Companies, LLC 3015 SW First Avenue Portland, Oregon 97201	Project Number: 2604-00	Drawn: JP	Approved: HG/MS	Figure **G-1**
	October 2020			

NOTE: Base map prepared from Google Earth Pro Imagery.
Aerial dated September 24, 2019. Tax Lot lines are approximate.

0 200 400
Scale in Feet

Site Plan

Work Plan
DEQ King Salvage Site - 109 King Place
Toledo, Oregon

Apex Companies, LLC 3015 SW First Avenue Portland, Oregon 97201	Project Number: 2604-00	Drawn: JP	Approved: HG/MS	Figure
	October 2020			G-2

Attachment A

National Historic Preservation Act and Tribal Consultations Letter (Stantec, 2019)

Stantec Consulting Services Inc.
9400 SW Barnes Road, Suite 200, Portland, OR 97225

August 1, 2019
File: 185750579

Attention: Margaret Olson
US Environmental Protection Agency, Region 10
Oregon Operations Office
805 SW Broadway, Suite 500
Portland, OR 97205

Dear Margaret:,

REFERENCE: NATIONAL HISTORIC PRESERVATION ACT AND TRIBAL CONSULTATIONS
Phase II Environmental Site Assessment
109 King Place, Newport, Oregon
Oregon Cascades West Council of Governments Brownfield Assessment Grant
(BF-01J40301)

On behalf of the Oregon Cascades West Council of Governments (OCWCOG), Stantec Consulting Services Inc. (Stantec) has prepared this summary of National Historic Preservation Act (NHPA) Section 106 and tribal cultural resources consultations and threatened and endangered species screening. The consultations were conducted to obtain input from the Oregon State Historic Preservation Office (SHPO) and Oregon federally-recognized tribes on a Phase II Environmental Site Assessment (ESA) planned for the King Salvage Property located at 109 King Place, Newport, Oregon (Property). The consultation approach and results are outlined below. Based on the information herein, we request that the U.S. Environmental Protection Agency (USEPA) issue a finding of no significant impact with respect to the Phase II ESA planned at the Property.

Oregon SHPO

On March 23, 2019, Stantec submitted a clearance form to the Oregon SHPO requesting comment on the planned scope of work for the Phase II ESA. A response indicating that the map provided with the clearance form could not be read was received from the SHPO on April 23, 2019 (Attachment A). Stantec resubmitted several maps via SHPO's online submittal process on May 29, 2019. On June 19, 2019, Stantec received a final response letter (Attachment A) stating the SHPO had no concerns with the project proceeding as planned.

REFERENCE: **NATIONAL HISTORIC PRESERVATION ACT AND TRIBAL CONSULTATIONS**
Phase II Environmental Site Assessment
109 King Place, Newport, Oregon
Oregon Cascades West Council of Governments Brownfield Assessment Grant (BF-01J40301)

Oregon Tribes

On March 23, 2019, Stantec contacted the federally-recognized Indian Tribes with potential interest in the Lincoln County area to inquire whether they had an interest in being consulted on the Property Phase II ESA Project. As of the date of this letter, the responses received included deference to the Siletz Indians from the Confederated Tribe of the Coos, Lower Umpqua, and Siuslaw Indians, and a response from the Confederated Tribes of Siletz Indians from Robert Kentta, Cultural Resources Director, who expressed support moving forward with the project with no archeological concerns. The solicitation and response emails are presented in Attachment B.

Stantec has prepared an Inadvertent Discovery Plan (IDP) outlining steps to take if cultural resources are encountered during the Phase II ESA. A copy of the IDP was provided to all Tribes that were consulted and will be provided to and reviewed with field crew members, and a copy will be maintained on site during the Phase II ESA field work. A copy of the IDP is provided in Attachment C.

Threatened and Endangered Species

A search was conducted on the US Fish and Wildlife Service (USFWS) Information, Planning, and Conservation (IPaC) system for threatened, endangered, and candidate species, and critical habitat on the Property. The IPaC system identified one mammal, and three birds that are threatened or endangered that may be present in the Property vicinity (Attachment D). The IPaC system indicates that either 1) the final critical habitat of the threatened or endangered species is outside the Property location, or 2) no critical habitat has been designated for the threatened or endangered species.

REFERENCE: **NATIONAL HISTORIC PRESERVATION ACT AND TRIBAL CONSULTATIONS**
Phase II Environmental Site Assessment
109 King Place, Newport, Oregon
Oregon Cascades West Council of Governments Brownfield Assessment Grant (BF-01J40301)

Conclusions

Based on the information provided above, we request that the USEPA issue a finding of no significant impact with respect to the Phase II ESA planned at the Property.

Please contact me with any questions.

Regards,

Stantec Consulting Services Inc.
Leonard Farr Jr., RG
Principal Geologist
Phone: (971) 230-5204
leonard.farr@stantec.com

Attachments: A. SHPO Responses
B. Tribe Solicitation of Interest and Responses
C. Inadvertent Discovery Plan
D. IPaC Resource List

Attachment A

SHPO Responses

Oregon
Kate Brown, Governor

Parks and Recreation Department
State Historic Preservation Office
725 Summer St NE Ste C
Salem, OR 97301-1266
Phone (503) 986-0690
Fax (503) 986-0793
www.oregonheritage.org

April 23, 2019

Mr. Leonard Farr
Stantec Consulting
9400 SW Barnes Road
Portland, OR 97225

RE: SHPO Case No. 19-0503
EPA, Stantec Project 185750579, King Salvage Newport
Sampling at a former salvage yard
109 King Place, Newport, Lincoln County

Dear Mr. Farr:

We have recently received a request from your office to review the project area referenced above for any known archaeological objects or sites. Unfortunately, the request arrived without a map that pinpoints the exact location of the proposed project that can be compared with the SHPO archaeology GIS database. The file included in the submission could not be read. Please send a map of the project area (using a 7.5' USGS map) that clearly depicts the project area in relation to its location (i.e., Township, Range and Section)? Our GIS system is based on USGS maps and small tax lot map or aerial photographs without reference points are not useful for comparative purposes. Upon receipt of a USGS map with Township, Range and Section, we will review your project application and get back to you in a timely manner. If you have not already done so, be sure to consult with all appropriate Indian tribes regarding your proposed project. In order to help us track your project accurately, please be sure to reference the SHPO case number above in all correspondence.

Sincerely,

John D. Pouley

John Pouley, M.A., RPA
Assistant State Archaeologist
(503) 986-0675
john.pouley@oregon.gov

cc: Carrie Rackey, Stantec

Oregon
Kate Brown, Governor

Parks and Recreation Department
State Historic Preservation Office
725 Summer St NE Ste C
Salem, OR 97301-1266
Phone (503) 986-0690
Fax (503) 986-0793
www.oregonheritage.org

June 19, 2019

Mr. Leonard Farr
Stantec Consulting
9400 SW Barnes Road
Portland, OR 97225

RE: SHPO Case No. 19-0503
EPA, Stantec Project 185750579, King Salvage Newport
Sampling at a former salvage yard
109 King Place, Newport, Lincoln County

Dear Mr. Farr:

The Oregon State Historic Preservation Office (SHPO) received a request to review an application for the above referenced undertaking (project). According to the SHPO statewide database, archaeological sites are not known to exist within the proposed project location. Based on the information provided, Oregon SHPO does not have any concerns with the project proceeding as planned.

During project implementation, if an archaeological object or feature is encountered, please stop all ground disturbing activity at that location, and contact our office (503 986-0980) to report the find. According to Oregon Revised Statute (ORS) 358.905(a)(A-C), "archaeological objects are at least 75 years old, are part of the physical record of an indigenous or other culture found in the state or waters of the state and are the material remains of past human life or activity." Archaeological objects can include historic items (e.g., bottles, cans, bricks, window glass) and prehistoric items (e.g., stone tools, chipped stone flakes, butchered animal bones, ground stone implements, fire-cracked rock, charcoal, lithic quarries, house pit villages, camps). Archaeological features can be historic (e.g., foundations, privies, ships, homesteads, townsites) or prehistoric (e.g., housepit villages, hearths, cairns [clustered or piled rocks], rock images, shell midden). Under state law (ORS 358.905 and ORS 97.74) archaeological sites, objects and human remains are protected on both state public and private lands in Oregon. A person may not excavate, injure, destroy or alter an archaeological site or object located on public or private lands in Oregon unless that activity is authorized by a permit issued under ORS 390.235.

If you have any questions, please feel free to contact our office at your convenience. In order to help track your project accurately, please reference the SHPO case number above in all correspondence.

Sincerely,

John D. Pouley

John Pouley, M.A., RPA
Assistant State Archaeologist
(503) 986-0675

john.pouley@oregon.gov

cc: Carrie Rackey, Stantec

Attachment B

Tribe Solicitation of Interest and Responses

Stantec

From:	Rackey, Carrie
To:	"Chris Bailey"; "Robert Kentta"; "jplueard@cowcreek.com"; "sscott@ctclusi.org"; "mcorvi@ctclusi.org"
Cc:	Farr, Leonard
Subject:	Cultural Resources - Environmental Study, King Salvage property
Date:	Saturday, March 23, 2019 3:59:00 PM
Attachments:	Inadvertent Discovery Plan KingSalvage.pdf

Hello,

I am seeking your input regarding cultural resources for a proposed environmental assessment at the King Salvage property at 109 King Place in Newport, Oregon (Lincoln County Tax Lot 11-11-11-00901-00, see maps below). The 6.56-acre property is located along and north of Hwy 20 approximately half way between Toledo and Newport.

The Oregon Cascades West Council of Governments has a US EPA grant to conduct environmental assessments on brownfield sites. Because the project is federally-funded, we must consult with you to ensure that cultural resources are not disturbed by the environmental assessment work.

We plan to conduct environmental sampling on this property to evaluate environmental impacts from many years of auto salvage activities. The environmental sampling will involve removing debris from the surface of the property, and collecting soil samples from 2-inch borings advanced using a hand auger. The number and depth of the borings will be based on field evidence of contamination (such as odors, staining, and field measurements). We anticipate 25-50 borings will be advanced to a maximum of 5 feet below ground surface. Assuming that 50 2-inch borings are advanced to 5 feet, the total volume of soil that will be disturbed will be limited to 5.45 cubic feet.

We have prepared the attached Inadvertent Discovery Plan (IDP) documenting steps that will be taken if cultural resources are encountered during the sampling. The IDP will be followed by all staff and subcontractors engaged with subsurface work during the sampling event.

We will also be submitting this notification to the State Historic Preservation Office for their approval prior to conducting any ground disturbing activities.

We plan to conduct the field sampling as soon as all required approvals are received. If we do not hear from you within 30 days of this email, we will assume you do not have comments regarding this environmental investigation.

Please feel free to contact me with any questions.

Thank you,
Carrie

Carrie Rackey CHMM
Senior Associate/Project Manager, Environmental Services
9400 SW Barnes Rd. Suite 200
Portland, OR 97005

Direct: 971.230.5203
carrie.rackey@stantec.com

Stantec

From: Stacy Scott
To: Rackey, Carrie
Subject: RE: Cultural Resources - Environmental Study, King Salvage property
Date: Monday, March 25, 2019 10:51:23 AM

Dear Ms. Rackey,

The Ancestral Territory of the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians extends from the mouth of Tenmile Creek (Lane County) in the north, south to Fivemile Point halfway between the mouths of Whiskey Run Creek and Cut Creek (coinciding with the border between Sections 30 and 31, Township 27 South, Range 14 West, Coos County), thence east to the crest of the Coast Range (to Weatherly Creek on the Umpqua River.) As such, the proposed work is outside of the Ancestral Territory of the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians. The Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians therefore, defer comments to the appropriate Tribe(s).

Please feel free to contact me if I may be of any further assistance.

Sincerely,
Stacy

Stacy Scott, MA, RPA
Tribal Historic Preservation Officer &
Cultural Resources Protection Specialist
Confederated Tribes of
Coos, Lower Umpqua & Siuslaw Indians
1245 Fulton Avenue
Coos Bay, Oregon 97420
541.888.7513 (office)
541.297.5543 (cell)
541.888.2853 (fax)
SScott@ctclusi.org

From: Rackey, Carrie [mailto:Carrie.Rackey@stantec.com]
Sent: Saturday, March 23, 2019 4:00 PM
To: Chris Bailey <Chris.Bailey@grandronde.org>; 'Robert Kentta' <rkentta@ctsi.nsn.us>; jplueard@cowcreek.com; Stacy Scott <sscott@ctclusi.org>; Margaret Corvi <MCorvi@ctclusi.org>
Cc: Farr, Leonard <Leonard.Farr@stantec.com>
Subject: Cultural Resources - Environmental Study, King Salvage property

Hello,

I am seeking your input regarding cultural resources for a proposed environmental assessment at the King Salvage property at 109 King Place in Newport, Oregon (Lincoln County Tax Lot 11-11-11-00901-00, see maps below). The 6.56-acre property is located along and north of Hwy 20 approximately half way between Toledo and Newport.

From:	Robert Kentta
To:	Rackey, Carrie
Cc:	Chris Bailey; jplueard@cowcreek.com; sscott@ctclusi.org; mcorvi@ctclusi.org; Farr, Leonard; Peter Hatch; Mike Kennedy; Stan van de Wetering
Subject:	Re: Cultural Resources - Environmental Study, King Salvage property
Date:	Sunday, March 24, 2019 3:01:55 PM

Thanks Carrie.

Danny Santos now holds the Interim Executive Director position at LCIS to designate the appropriate tribe or tribe(s) in regards to potential tribal interests in cultural resources or ancestral remains - Karen Quigley had to suddenly resign her position last year for health reasons.

So that correction/amendment - and any due to expressions of deference that may come in from some of the Tribal reps copied here - as this location is clearly in the Yaquina ancestral territory, and I know of no other Tribe who claims descendancy from the Yaquina People. They were however incorporated into the Confederated Tribes of Siletz Indians. Once any responses amend the list of those interested in the IDP for this project, that should be the finalized IDP. This location is in the heart of the Siletz Reservation as established in 1855.

I know that some of our Nat. Res. Staff have been onsite - I haven't been on the property for over 45 years, but I know it fairly well, and understand that it's use as King Salvage junkyard/wrecking-yard started by the early 60's - if not somewhat earlier. I have heard that there was a foreclosure or some other (walkaway) situation with ownership of the property. Many decades of who-knows-what leaching into the soils there - I fully support the efforts to identify the elements and compounds of contaminants present - and the development of appropriate plans for cleanup of the property.

Robert Kentta
Cultural Resources Director
Confederated Tribes of Siletz Indians

Sent from my iPhone

On Mar 23, 2019, at 3:59 PM, Rackey, Carrie <Carrie.Rackey@stantec.com> wrote:

> Hello,
>
> I am seeking your input regarding cultural resources for a proposed environmental assessment at the King Salvage property at 109 King Place in Newport, Oregon (Lincoln County Tax Lot 11-11-11-00901-00, see maps below). The 6.56-acre property is located along and north of Hwy 20 approximately half way between Toledo and Newport.
>
> <image001.jpg><image002.jpg><image003.jpg>
>
> The Oregon Cascades West Council of Governments has a US EPA grant to conduct environmental assessments on brownfield sites. Because the project is federally-funded, we must consult with you to ensure that cultural resources are not disturbed by the environmental assessment work.
>
> We plan to conduct environmental sampling on this property to evaluate environmental

Attachment C

Inadvertent Discovery Plan

Stantec

Stantec

To:	Interested Oregon Tribes	From:	Carrie Rackey
File:	Oregon Cascades West Council of Governments EPA Brownfield Grant	Date:	March 23, 2019

REFERENCE: Inadvertent Discovery Plan - Environmental Assessment
King Salvage Property, 109 King Place, Newport, Oregon

INTRODUCTION

This Inadvertent Discovery Plan (IDP) will be followed if cultural resources, including human remains, are encountered during ground disturbing activities. This project involves removing surface debris and collecting soil samples by advancing 25-50 soil borings to a depth of up to 5 feet below ground surface using a hand auger. The soil borings will be approximately 2 inches in diameter.

PROTOCOL FOR INADVERTENT DISCOVERY OF CULTURAL RESOURCES

Cultural resources may include evidence of prehistoric or historic features including postholes/molds, hearths, pits, walls, foundations, and other evidence of structural remains, shell midden, non-human bone, lithic debitage, formed-stone –bone –shell –wood or –fiber implements, historic-period glass and ceramics.

If cultural resources are discovered during work, the field manager will immediately halt work at that location and notify each of the contacts listed in Table 1 below. The discovery area and a surrounding buffer zone shall be delineated with flags tied to stakes that will be driven into the ground. These stakes shall not be removed. The buffer zone established around the discovery zone shall be large enough to allow ground disturbance activities to resume outside the buffer. Work will not restart until clearance is received from the State Historic Preservation Officer (SHPO), Oregon Commission on Indian Services (CIS), and appropriate Tribes as identified by CIS.

Table 1 - Notification of Cultural Resource Discovery

Organization	Contact	Contact
Oregon Cascades West Council of Governments	Jeff Gepper	541-924-8430
Stantec	Leonard Farr	971-230-5204
Oregon State Historic Preservation Officer (SHPO)	Dennis Griffin	503-986-0674
OR Commission on Indian Services (CIS)	Mitch Sparks	503-986-1067

Reference: **Inadvertent Discovery Plan - Environmental Assessment**
2009 SE Sturdevant Road, Toledo, Oregon

Organization	Contact	Contact
Confederated Tribes of Siletz	Robert Kentta Peter Hatch	rkentta@ctsi.nsn.us peterh@ctsi.nsn.us 541-351-0148 (text)
Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians	Stacy Scott	541-888-9577 x. 7513
Confederated Tribes of Grand Ronde	Briece Edwards (Human Remains) Chris Bailey (All Other)	503-879-2084 503-879-1675
Cow Creek Band of Umpqua Tribe of Indians	Jessie Plueard	541-677-5575

PROTOCOL FOR INADVERTENT DISCOVERY OF HUMAN REMAINS

If, during ground disturbing activities, any bone(s) that may be human, or any funerary object, is discovered, all environmental assessment activity at the property will cease immediately. The field manager will immediately halt work at that location and notify each of the contacts listed in Table 2 below. A surrounding buffer zone shall then be delineated with flagging tied to long stakes that are driven in to the ground. The buffer zone established around the periphery of the possible human remains shall be sufficient in extent to allow the contractor to conduct ground disturbing activities as near to the flagged-off area as necessary, as long as the stakes and flagging are not disturbed. Work will not restart until clearance is received from the Oregon State Police, SHPO, CIS, and appropriate Tribes as identified by CIS.

Table 2 - Notification of Human Remains Discovery

Organization	Contact	Phone
Oregon State Historic Preservation Officer (SHPO)	Dennis Griffin	503-986-0674
Oregon State Police	Sgt. Chris Allori	503-731-4717
OR Commission on Indian Services (CIS)	Mitch Sparks	503-986-1067
Additional Tribes as directed by CIS	TBD	TBD

Attachment D

IPaC Resource List

Stantec

IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Lincoln County, Oregon

Local office

Oregon Fish And Wildlife Office

(503) 231-6179
(503) 231-6195

2600 Southeast 98th Avenue, Suite 100
Portland, OR 97266-1398

https://www.fws.gov/oregonfwo/articles.cfm?id=149489416

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information.
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Red Tree Vole Arborimus longicaudus No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8830	Candidate

Birds

NAME	STATUS
Marbled Murrelet Brachyramphus marmoratus There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/4467	Threatened
Northern Spotted Owl Strix occidentalis caurina There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/1123	Threatened
Western Snowy Plover Charadrius nivosus nivosus There is **final** critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/8035	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php
- Measures for avoiding and minimizing impacts to birds http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php
- Nationwide conservation measures for birds http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Jan 1 to Sep 30
Black Oystercatcher *Haematopus bachmani* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9591	Breeds Apr 15 to Oct 31
Clark's Grebe *Aechmophorus clarkii* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Jan 1 to Dec 31
Great Blue Heron *Ardea herodias fannini* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 15 to Aug 15

Marbled Godwit Limosa fedoa — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9481

Olive-sided Flycatcher Contopus cooperi — Breeds May 20 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/3914

Rufous Hummingbird selasphorus rufus — Breeds Apr 15 to Jul 15
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8002

Short-billed Dowitcher Limnodromus griseus — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9480

Western Screech-owl Megascops kennicottii kennicottii — Breeds Mar 1 to Jun 30
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Whimbrel Numenius phaeopus — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9483

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Marbled Godwit
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

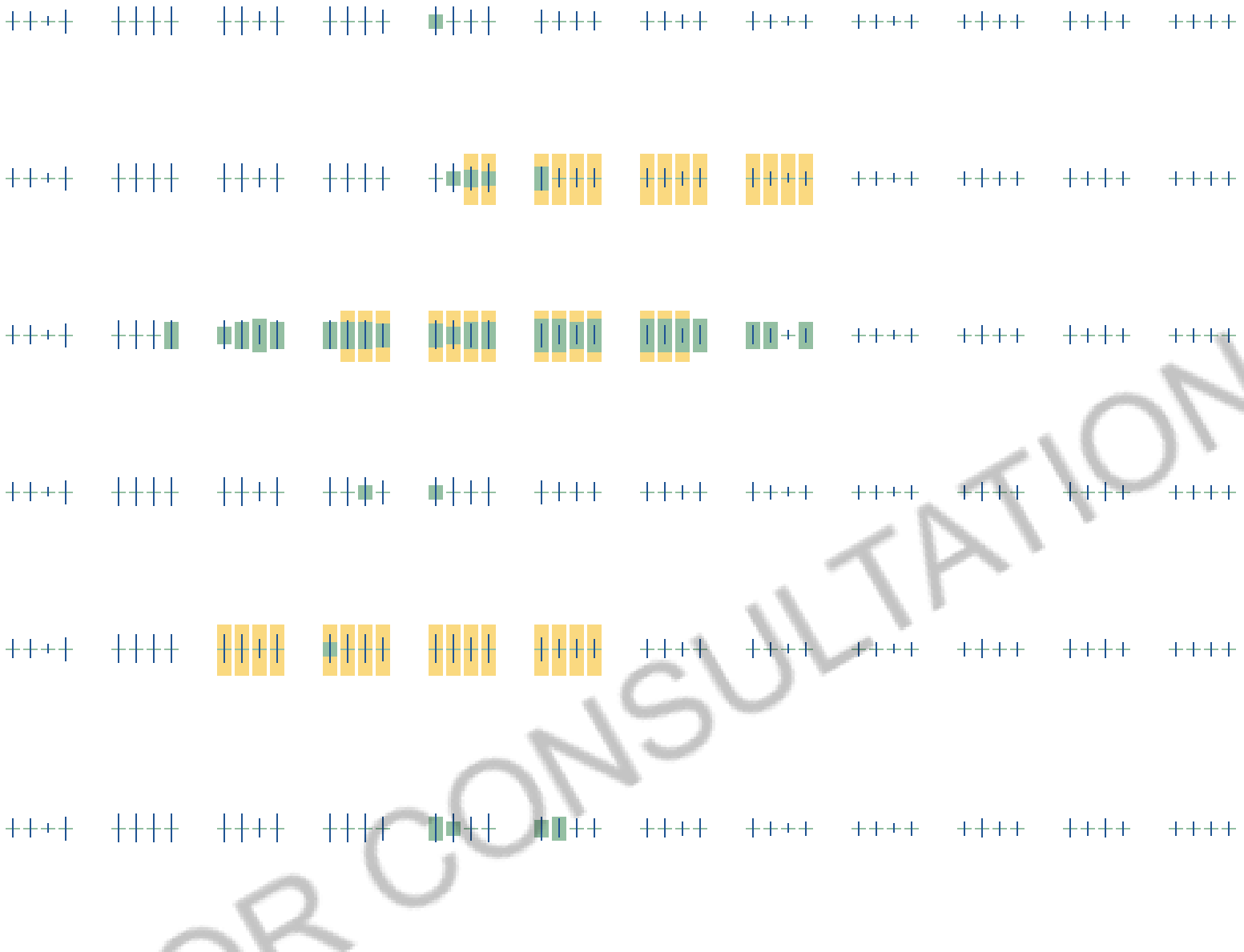
Olive-sided Flycatcher
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Rufous Hummingbird
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Short-billed Dowitcher
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

Western Screech-owl
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)

Whimbrel
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure.

To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures and/or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the E-bird Explore Data Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets .

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide, or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ “What does IPaC use to generate the migratory birds potentially occurring in my specified location”. Please be aware this report provides the “probability of presence” of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the “no data” indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and

helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

FRESHWATER EMERGENT WETLAND

PEM1C
PEM1Cx

RIVERINE

R2UBH
R4SBC
R5UBH

A full description for each wetland code can be found at the National Wetlands Inventory website

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of

any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Appendix C

Health and Safety Plan (HASP)

This Level 2 HASP is intended to provide health and safety guidelines for project field work meeting the following criteria:

- **Short-duration work not exceeding 30 consecutive days**
- **"Buddy System" in use (or communication plan implemented for "lone worker"**
- **Some likelihood of chemical and/or physical hazard exposure**
- **Limited number of job tasks (5 or less)**
- **No supplied-air respirator use**
- **Limited number of subcontractors involved (3 or less)**

The Project Manager should review this Health and Safety Plan with all Apex project personnel. A copy of the HASP must be kept in the field with the project team as well as maintained in project files.

Administrative Information **This document is valid for a maximum time period of one year after initial completion and must be re-evaluated by the project team at that time.** **A minimum of two persons with appropriate training and medical surveillance must be onsite or an appropriate communication plan must be implemented. A mix of Apex and other personnel can satisfy this requirement.**	Site Name and Location King Salvage, Toledo, OR	
	Client Contact and Phone Nancy Sakwa, 503-706-6735	
	Project Name King Salvage	
	Health & Safety Plan Date 9/30/2020	Revision Number and Date 3 – 8/14/2024
	Field Work Start Date Fall/Winter 2024	Anticipated Field Work End Date Fall/Winter 2024
	Project Manager (*responsible for implementing the site health and safety program on this project*) Andrew Bisbee	Site Safety Officer (SSO) (*responsible for overall site health and safety performance on this project).* Andrew Bisbee

Project Background and Scope of Work

Include numbered list of tasks to be completed by Apex personnel during this project, and a separate list of tasks to be completed by any subcontractors at the site.

JSAs are to be prepared for each task listed. Subcontractors are responsible for preparing JSAs for their activities.

Apex Scope of Work: Oversee solid and hazardous waste removal activities.
As an added measure of safety, review the Apex COVID-19 Awareness JSA.

Subcontractor Scope of Work: None

Site/Project General Information

An asterisk (*) indicates that additional checklists or permits are required and must be completed and attached to this document.

A double asterisk (**) indicates that a Risk Review performed by a member of the Corporate Safety Committee must take place prior to beginning fieldwork on the project.

Site Type (check all applicable boxes)

☐ Active Facility	☐ Remote Facility	☒ Inactive Facility	☐ Residential
☐ Mine	☐ Railroad	☐ Industrial	☐ Secured
☒ Uncontrolled	☐ Other (specify)		

Main Site Hazards (check all applicable boxes)

☒ Slip/Trip/Fall	☐ Cold Stress	☒ Heat Stress	☒ Extreme Weather
☒ Biological	☒ Organic/Inorganic Chemicals	☐ High Noise	☐ Construction Traffic
☐ Vehicular Traffic	☒ Respirable Particles	☐ Excavations	☐ Buried/Overhead Utilities
☐ Non-Ionizing Radiation	☒ Security	☐ ASTs/USTs	☐ Manlift/Cherry Picker Use
☐ Work Over 6' High*	☐ Hand/Portable Power Tools	☐ Oxygen Deficiency	☐ Construction
☐ Blasting Agents	☐ Confined Spaces	☐ Welding or Hot Work	☐ Lockout/Tagout*
☐ Lockout/Tagout	☐ Forklift Use	☐ Chemical Mixing**	☐ Commercial Vehicle
☐ Scaffold Use	☐ Portable Ladders	☒ Other (*specify*)	Potential exposure to COVID-19

Chemical Products Apex will Use or Store Onsite

For each chemical product identified, an SDS must be attached to this HASP

- ☒ Alconox or Liquinox
- ☐ Hydrochloric acid (HCl)*
- ☐ Nitric acid (HNO_3)*
- ☐ Sodium hydroxide (NaOH)*
- ☐ Calibration gas (Methane)
- ☐ Calibration gas (Isobutylene)
- ☐ Calibration gas (Pentane)
- ☐ Calibration gas (4-gas mixture)
- ☐ Other (specify)
- ☐ Isopropyl Alcohol
- ☐ Household bleach (NaOCl)*
- ☐ Sulfuric acid (H_2SO_4)*
- ☐ Hexane
- ☐ Other (specify)

***NOTE: Eyewash solution shall be readily available on ALL projects where corrosive materials are used or stored, including sample preservatives.**

Safe Work Practices

Place a checkmark by applicable SWPs and attach to this document

For hazards not covered by SWPs listed in this section, ensure the hazard is addressed in the JSA for that task. Otherwise, the JSA may reference the SWP for that hazard.

SWPs Applicable To This Project (check all applicable boxes)

☒ Hazard Communication	☒ Medical Services and First Aid	☒ Airborne Contaminants	☒ Heat Stress
☐ Cold Stress	☒ Natural Hazards	☒ Personal Protective Equipment	☒ Respiratory Protection
☐ Confined Space Entry	☐ Drum Handling	☐ Excavation	☐ Fall Protection and Prevention
☐ Forklift and Truck Operations	☐ Hand/Power Tool Use	☐ Heavy and Material Handling Equipment	☐ Ladder Safety
☐ **Other Task (specify)**	☐ **Other Task (specify)**	☐ **Other Task (specify)**	☐ **Other Task (specify)**
☐ **Other Task (specify)**	☐ **Other Task (specify)**	☐ **Other Task (specify)**	☐ **Other Task (specify)**

Levels of Protection Required for each Task

Signature of the SSO on page 1 of this document signifies certification of PPE Hazard Assessment

Task Description	Level			
	A	B	C	D
Oversee contaminated soil and solid waste removal activities	☐	☐	☐	☒
	☐	☐	☐	☐
	☐	☐	☐	☐
	☐	☐	☐	☐
	☐	☐	☐	☐

Personal Protective Equipment	Equipment	Req	Rec	NA	Equipment	Req	Rec	NA
Req=Required Rec=Recommended An asterisk (*) indicates that employees must be a participant in the respiratory program, including, annual training and fit testing.	Steel Toe Boots	☒	☐	☐	Tyvek Suit	☐	☐	☒
	Safety Glasses Shields	☐	☒	☐	Outer Disposable Boots	☐	☒	☐
	Hi Vis Vest (Specify Class 2/3)	☒	☐	☐	Indirect Vented Goggles	☐	☒	☐
	Hi Vis Shirt	☐	☒	☐	Poly-Coated Tyvek	☐	☐	☒
	Hard Hat	☐	☒	☐	Dust Mask*	☐	☐	☒
	Fire Resistant Clothing (FRC)	☐	☐	☒	Full-Face Respirator*	☐	☐	☒
	Hearing Protection	☐	☐	☒	Half-Face Respirator*	☐	☐	☒
	Work Gloves – Type: Cut resistant, nitrile, and leather	☐	☒	☐	Inner Chemical Gloves	☐	☒	☐
	Outer Chemical Gloves	☐	☒	☐	Other (specify) Cloth face covering	☒	☐	☐
Training and Medical Surveillance Req=Required Rec=Recommended	**Training**	**Req**	**Rec**	**NA**	**Medical Surveillance**	**Req**	**Rec**	**NA**
	40 Hour HAZWOPER	☒	☐	☐	Medical Clearance (fit for duty)	☒	☐	☐
	Current 8 Hour HAZWOPER	☒	☐	☐	Respirator Clearance	☒	☐	☐
	8 Hour HAZWOPER Supervisor	☐	☐	☐	Blood Lead and ZPP	☒	☐	☐
	24Hour HAZWOPER	☐	☐	☐	Other (specify)	☐	☐	☐
	Current CPR and First Aid	☒	☐	☐	Other (specify)	☐	☐	☐
	10 Hour Construction	☐	☐	☐	Other (specify)	☐	☐	☐
	Other (specify)	☐	☐	☐	Other (specify)	☐	☐	☐
	Other (specify)	☐	☐	☐	Other (specify)	☐	☐	☐
	Other (specify)	☐	☐	☐	Other (specify)	☐	☐	☐
Safety Supplies Req=Required Rec=Recommended	**Supplies**	**Req**	**Rec**	**NA**	**Supplies**	**Req**	**Rec**	**NA**
	First Aid Kit	☒	☐	☐	Fire Extinguisher	☒	☐	☐
	Eyewash Solution	☒	☐	☐	Water/Sports Drink	☐	☒	☐
	Air Horn	☐	☐	☐	Oral Thermometer (heat monitoring)	☐	☒	☐
	Noise Meter (Dosimeter)	☐	☐	☐	Decontamination Supplies	☒	☐	☐

Work Zones **If exclusion zones are necessary because of chemical OR equipment hazards, describe the plan**	Exclusion Zone: An exclusion zone will be established around heavy machinery that will be operating to compile and stage solid waste for removal. The exclusion zone will be established with cones, caution tape or other markings.
	Contamination Reduction Zone: Apex personnel will say at least 10 feet away from heavy equipment.
	Support Zone: The support zone will be established away from the work exclusion zone and solid waste staging area to enable oversight by Apex personnel.

Site Access/Control **How do we limit unauthorized entry to the site itself?**	Access Control Procedures: Cones, caution tape, or other markings will be used to control access to the Site. No unauthorized personnel will be allowed on-site during the solid waste removal activities.
DECON Procedures	Decontamination Procedures: Follow Level D PPE decontamination procedures.

Communication Plan **In the event work must be completed alone by an Apex employee or work is performed in a rural area with limited communication, this Communication Plan must be completed.**	The purpose of the communication plan is to provide a "What to Do" if the project manager/supervisor cannot contact field personnel. The field team and PM must coordinate a call-in time daily. The check-in intervals will depend on the project setting and hazards. More importantly, if the field team does not check in, what is the requirement or actions of the PM.			
	Daily Check in Time	Responsible Person	Daily Check in Time	Responsible person
	1600	Andrew Bisbee		
	Plan of Action (in the event of no communication): If no communication, project manager or safety officer will attempt to call responsible person, or other on-site field staff. If no one is reachable, a message will be left, and a second contact attempt will be made in 10 minutes. If no communication is made after 30 minutes, then the DEQ project manager will be contacted directly.			

Chemicals of Concern

In the section to the right, check any chemicals present onsite in any media (air, soil water).

In the table below, list chemicals suspected or confirmed to be onsite, and provide requested information.

☐ Friable Asbestos	☐ alpha-Napthylamine	☐ Methyl chromoethyl ether
☐ 3,3'-Dichlorobenzidine	☐ bis-Chloromethyl ether	☐ beta-Napthylamine
☐ Benzidine	☐ 4-Aminodiphenyl	☐ Ethyleneimine
☐ beta-Propiolactone	☐ 2-Acetylaminoflourene	☐ 4-Dimethylaminoazobenzene
☐ N-Nitrosomethylamine	☐ Vinyl chloride	☐ Inorganic arsenic
☐ Lead	☐ Chromium (VI)	☐ Cadmium
☐ Benzene	☐ Coke oven emissions	☐ 1,2-Dibromo-3-chloropropane
☐ Acrylonitrile	☐ Ethylene oxide	☐ Formaldehyde
☐ Methylenedianiline	☐ 1,3-Butadiene	☐ Methylene chloride
☐ Other_____	☐ **No Apex exposure to these**	☐ Sub Slab VOCs

Materials Present or Suspected at Site	Highest Reported Concentration (specify units and sample medium)	Exposure Limit (specify ppm or mg/m³)	IDLH Level (specify ppm or mg/m³)	Primary Hazards of the Material (explosive, flammable, corrosive, toxic, volatile, radioactive, biohazard, oxidizer, or other)	Symptoms and Effects of Acute Exposure	Ionization Potential (eV)
Petroleum Hydrocarbons	13,000 mg/kg	PEL = 500 REL = 350 TLV = Skin Hazard ☐	1,100ppm	Flammable	Fatigue, headache, nausea, dizziness. Exposure to high levels can lead to coma or death.	
Arsenic	39 mg/kg	PEL = 0.01 mg/m3 REL = 0.002 mg/m3 TLV = Skin Hazard ☐	5 mg/m3	Strong oxidizers	Ulceration of nasal septum, dermatitis, gastrointestinal disturbances, peripheral neuropathy, resp irritation, hyperpigmentation of skin	
Chromium	450 mg/kg	PEL = 1 mg/m3 REL = 0.5 mg/m3 TLV = Skin Hazard ☐	250 mg/m3	Strong oxidizers	Irritation eyes, skin; lung fibrosis	
Lead	778 mg/kg	PEL = 0.05 mg/m3 REL = 0.05 mg/m3 TLV = Skin Hazard ☐	100 mg/m3	Strong oxidizers	Lassitude, insomnia, facial pallor, anorexia, weight loss, malnutrition, constipation, abdominal pain, colic, anemia, tremor, irritation eyes	

PEL = OSHA Permissible Exposure Limit
REL = NIOSH Recommended Exposure Limit
IDLH = Immediately Dangerous to Life or Health
TLV = ACGIH Threshold Limit Value

Monitoring Equipment: All monitoring equipment on site must be calibrated before and after each use and results recorded.				
Instrument (Check all required)	**Task**	**Instrument Reading**	**Action Guideline**	**Comments**
☐ Combustible gas indicator model:	☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5	0 to 10% LEL	Monitor; evacuate if confined space	
		10 to 25% LEL	Potential explosion hazard	
		>25% LEL	Explosion hazard; interrupt task; evacuate site	
☐ Oxygen meter model:	☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5	>23.5% Oxygen	Potential fire hazard; evacuate site	
		23.5 to 19.5% Oxygen	Oxygen level normal	
		<19.5% Oxygen	Oxygen deficiency; interrupt task; evacuate site	
☐ Radiation survey meter model:	☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5	Normal background	Proceed	Annual exposure not to exceed 1,250 mrem per quarter Background reading must be taken in an area known to be free of radiation sources
		Two to three times background	Notify SSO	
		>Three times background	Radiological hazard; interrupt task; evacuate site	
☒ Photoionization detector model: ☐ 11.7 eV ☒ 10.6 eV ☐ 10.2 eV ☐ 9.8 eV ☐ _____ eV	☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5	Any response above background to 5 ppm above background	Level D is acceptable	Action levels must be determined based on the COCs and concentrations identified in the media sampled. If no COC conentrations are known, then use 5 ppm sustained within the breathing zone as your action level until the contaminants are identified.
		ppm above background	Level C (not anticipated)	
		ppm above background	Discontinue work	
☐ Flame ionization detector model:	☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5	Any response above background to ppm above background	Level C is acceptable Level B is recommended	Action levels must be determined based on the COCs and concentrations identified in the media sampled. If no COC conentrations are known, then use 5 ppm sustained within the breathing zone as your action level until the contaminants are identified.
		ppm above background	Level B	
		above background	Level A	
☐ Detector tube models:	☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5	Specify:	Specify:	The action level for upgrading the level of protection is one-half of the contaminant's PEL. If the PEL is reached, evacuate the site and notify a safety specialist.
☐ Other (specify):	☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5	Specify:	Specify:	

Emergency Response Planning	
In the pre-work briefing and Daily Tailgate Safety meetings, all onsite employees will be trained in the provisions of emergency response planning, site communication systems, and site evacuation routes. **Signal a site emergency or medical emergency with three blasts of a loud horn (car horn, foghorn, or similar device).** **To complete this section, attach a hospital route map to the HASP.**	**All work-related incidents must be reported. For all medical emergencies, call 911 or the local emergency number. For non-emergency incidents, you must:** • Give appropriate first aid care to the injured or ill individual and secure the scene. • Immediately call WorkCare at (888) 449-7787 (available 24 hours/7 days per week) if the injured person is an Apex employee. • Notify the Project Manager and/or SSO after calling WorkCare. • Enter the safety incident into the Apex Incident Report and submit to incidents@apexcos.com within 24 hours. **In the event of an emergency that necessitates evacuation of the work task area or the site as a whole, the following procedures shall occur:** • The Apex site supervisor or Project Manager will contact all nearby personnel using the onsite communications system to advise of the emergency. • Personnel will proceed along site roads to a safe distance upwind from the hazard source to a pre-determined assembly area. • Call 911 • Personnel will remain in that area until the site supervisor or Project Manager or other authorized individual provides further instruction. **In the event of a severe spill or leak, site personnel will follow the procedures listed below:** • Evacuate the affected area and relocate personnel to an upwind, pre-determined assembly area. • Inform the Apex site supervisor or Project Manager, an Apex office, and a site representative immediately. • Locate the source of the spill or leak, and stop the source if it is safe to do so until appropriately trained personnel are onsite to do so. • Begin containment and recovery of spilled or leaked materials. • Notify appropriate local, state, and federal agencies after obtaining client consent to do so. **In the event of severe weather, site personnel will follow the procedures listed below:** • Site work shall not be conducted during severe weather, including high winds and lightning. • In the event of severe weather, stop work, lower any equipment (drill rigs), and evacuate the affected area. • Monitor internet or other sources for sever weather alerts before resuming work. • In the event of lightning, outdoor work must be halted for a minimum of 30 minutes from the last lightening observation.

Emergency Contacts	Name	Location	Phone	Cell Phone
Hospital (attach map)	Newport Hospital	721 SW 9th St. Newport, OR	541-265-2244	
Police	911		911	
Fire	911		911	
Project Manager	Andrew Bisbee	Portland, OR	503-924-0414	567-454-2429
Field Manager (if not PM)				
Site Safety Officer (if not PM)	Mike Stevens	Portland, OR	503-924-4704 x 1919	503-312-2674
Division H&S Contact	Steve Misner	Portland, OR	503-924-4704x1925	503-348-3906
Corporate H&S Contact	Jay Strauss	15850 Crabbs Branch Way, Ste 200, Rockville, MD	301-417-0200 x 7398	406-672-9357
Incident Intervention	WorkCare	NA	888-449-7787	
Subcontractor Safety Contact				
Subcontractor Safety Contact				

Acknowledgement	***I have read, understood, and agree with the information set forth in this Health & Safety Plan, and will follow guidance in the plan and in the Apex Corporate Health and Safety Manual. I understand the training and medical monitoring requirements for conducting activities covered by this HASP and have met these requirements.*** ***Apex has prepared this plan solely for the purpose of protecting the health and safety of Apex employees. Subcontractors, visitors, and others at the site are required to follow provisions in this document at a minimum, but must refer to their organization's health and safety program for their protection.***		
Printed Name	Signature	Organization	Date

Approval Signatures

Signatures in this section indicate the signing employee will comply with and enforce this HASP, as well as procedures and guidelines established in the Apex Corporate H&S Manual. Signatures in this section also indicate that any subcontractors performing work under contract to Apex agree to comply with this HASP.

APEX

Solid Waste Removal Oversight
Job Safety Analysis (JSA)

Project Number:	**23010077**	Project/Client Name:	**King Salvage / DEQ**
Project Manager:	**Andrew Bisbee**	Project Location:	**Toledo, OR**

Specific Task:	**Cleanup Action Oversight.**
Minimum Required PPE for Task:	☐ Hard Hat ☑ Safety Toed Boots ☐ Safety Glasses ☐ Hearing Protection ☐ Long Sleeved Shirt ☐ Fire Resistant Clothing ☐ Hi-Vis Shirt ☑ Hi-Vis Vests Class 2 ☐ Hi-Vis Vests Class 3 ☐ Coverall ☑ Gloves ☐ Respirator ☐ Face Shield Nitrile, cut-resistant, leather <type and cartridge> ☑ Other (specify): Cloth face covering.

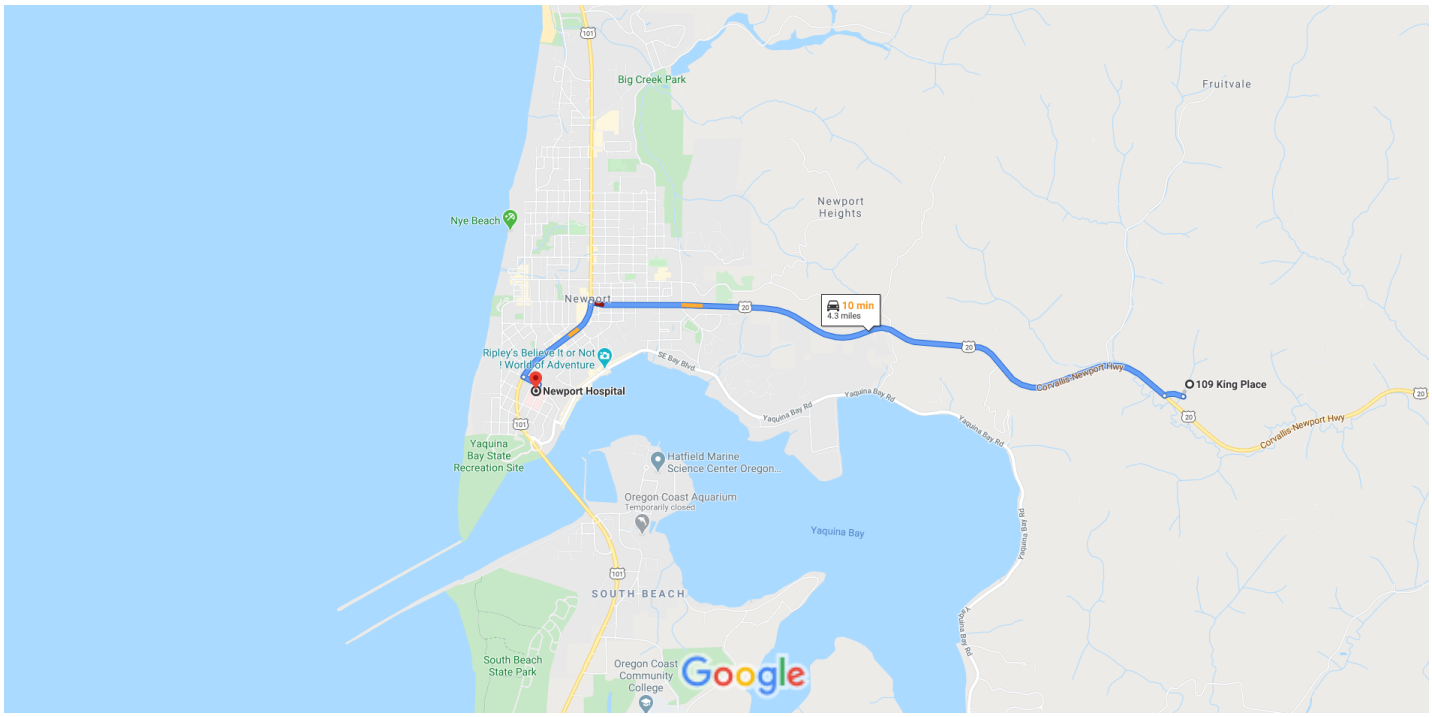
Additional Task-Step Specific PPE: (as indicated below under controls)		**Equipment/Tools Required:**	**Camera, Site Map**
Training Required for this Task:	**HAZWOPER40**	**Permits Required for this Task: (e.g. confined space, LOTO)**	**GDP**
Forms Associated with this Task:	**HASP, Daily Tailgate Meeting form.**		

JSA Developed/Reviewed By:			**Date and Revision Number:**	8/15/2024
Employee Name/Job Title	Employee Name/Job Title	Employee Name/Job Title	H&S Team Leader to ensure all personnel performing this task have reviewed JSA and agree to follow it. Site specific changes to this JSA have been made as warranted based on this review. H&S Team Leader Signature/Date:	
Tess Chadil / Proj. Mngr				
Mike Stevens / Principal				

Task Steps	Potential Hazards and Consequences	Likelihood	Severity	Risk	Controls to Eliminated/Reduce Risks
1. Pre-Field Safety Meeting	N/A			0	All employees will attend a pre-field meeting which will include the pertinent SOPs, client-specific Job Safety Analysis, Permit(s) to Work (if required), Subsurface Investigation Procedures, potential hazards, and actual hazards present and controls for those hazards
2. Travelling to/from the Site	2a. Traffic accident - Injury	2	3	6	Follow posted speed limits and traffic signs. Stay alert to other vehicles, cyclists, pedestrians and be a defensive driver by maintaining a safe distance with other vehicles on the road.
	2b. Improperly secured load - Accident or injury	1	3	3	Maintain good housekeeping to securely load vehicles and ensure that loose or light items that may shift during travel are secured. Use ratcheting straps, covers, etc. to secure loads.
3. Oversight activities	3a. Exposure to hazardous flora and fauna	3	2	6	Inspect the area for hazardous flora and fauna, avoid walking in those areas. Wear long pants and sleeves.
	3b. Exposure to hazardous solid waste materials	2	2	4	Avoid walking on hazardous solid waste. Look for and avoid buried debris.
	3c. Noise related injuries.	2	2	4	Wear approved safety ear plugs when working in the vicinity of operating equipment.
	3d. On-site creek - Accident or injury	1	1	1	There is a small creek on-site. Avoid walking in or adjacent to the creek to avoid a slip/trip/fall accident in the water, mud, or potential cobbles/rocks present.
	3e. Heavy equipment - Accident or injury	1	4	4	Stay clear of operating equipment, a minimum of 10 feet. Set up good communication with subcontractors operating the equipment. Maintain eye contact with equipment operator before entering work area.
	3f. Slip/trips/falls - Injury	2	3	6	Maintain good housekeeping. Inspect the area of tripping hazards. If grass or vegetation is tall, objects may be obscured. Ensure good footing in the work area. Sturdy work boot required.

			Hazard Severity				
			1	2	3	4	5
			INSIGNIFICANT negligible or no injury could result	**MINOR** minor injury requiring only first aid	**MODERATE** injury resulting in lost time could occure	**HIGH** serious injury or death could occur	**VERY HIGH** multiple deaths could occur
Likelihood	1	VERY UNLIKELY	1	2	3	4	5
	2	UNLIKELY	2	4	6	8	10
	3	POSSIBLE	3	6	9	12	15
	4	LIKELY	4	8	12	16	20
	5	VERY LIKELY	5	10	15	20	25

Google Maps 109 King Place, Toledo, OR to Newport Hospital Drive 4.3 miles, 10 min



Map data ©2020 2000 ft

109 King Pl

Toledo, OR 97391

1. Head west on King Pl toward US-20 E — 0.1 mi
2. Turn right onto US-20 W — 3.5 mi
3. Turn left onto US-101 S — 0.6 mi
4. Turn left onto SW Abbey St — 0.1 mi
5. Turn right
   Destination will be on the right — 89 ft

Newport Hospital

721 SW 9th St, Newport, OR 97365

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.