

* L U S T F O R M *

----- INCIDENT INFORMATION -----

LUST Incident Nbr: _____ LUST Log Nbr: 03-92-138 UST Facility ID: 4625
 Date Received: 5-15-92 Received By: EMB Emergency Resp Taken: Y ☒ N
 Tank Identification: File Name: RSG Forest Products
 Street: 28890 Hwy 213
 City: Molalla Zip: 97038
 County: Clackamas Phone: 829-7200

Incident Comments: _____

LUST

----- CONTACT & MAIL TYPES -----

Reported By: Jeff Tyseeling LUST Contact: _____ Responsible Party: Mark Reeves
 Name: _____ Name: _____
 Company: Jeff Tyseeling Enterprises Company: _____ Company: RSG Forest Products
 Street: PO Box 748 Street: _____ Street: PO Box 169
 City: Estacada Zip: 97023 City: _____ Zip: _____ City: Molalla Zip: 97038
 State: OR Phone: 287-3797 State: _____ Phone: _____ State: OR Phone: 829-7200

----- SITE ASSESSMENT -----

LUST Incident Nbr: (XXXXXXXXXXXXX)
 Date Investigated: _____ Investigated By: _____
 Release Exists: ☒ Y ☐ N Confirmation Method: A) Staff B) Lab: DEC ☒ C) Lab: RP D) Lab: Other E) RP F) Other
 (Circle) (Circle)
 Cleanup Necessary: ☒ Y ☐ N Regulated Tank: ☒ Y ☐ N Exposure Assessment: Y ☒ N
 (Circle) (Circle)
 Off-Site Migration: Y ☒ N ? Estimated Gallons Released: _____ Priority: _____
 (Circle)
 Discovery Date: 2/21/92 - awaiting lab results - rec'd rpt of release confirmation by 5/15/92
 How Discovered: A) Routine Monitoring B) Inventory Control ☒ C) Decommissioning D) Site Assessment
 (Circle) E) Complaint F) Tank Test G) Other
 Material Released: A) Unleaded Gasoline B) Leaded Gasoline C) Misc. Gasoline
 (Circle) ☒ D) Diesel E) Fuel Oil F) Waste Oil
 G) Lubricant H) Solvent I) Bunker Fuel
 J) Other Pet. Dist. K) Chemical L) Unknown
 Source of Release: A) Tank Leak B) Pipe Leak ☒ C) Overfill D) Surface Spill
 (Circle) E) Pump/Valve Leak F) Other ☒ G) Unknown
 Impacts: Soil ☒ Y ☐ N % ?
 (Circle) Groundwater ☐ Y ☒ N % ?
 Surface Water ☐ Y ☒ N % ?
 Drinking Water ☐ Y ☒ N % ?
 Facility (Vapor) ☐ Y ☒ N % ?
 Facility (Free Product) ☐ Y ☒ N % ?

Site Assessment Comments: Cont. also discovered around previously abandoned tank.

----- SITE MANAGEMENT -----

LUST Incident Nbr: (XXXXXXXXXXXXX)
 Date Released Stopped: _____
 Cleanup Activity: Start Date: _____ Under Control Date: _____
 End Date: _____ Contractor Name: _____
 Cleanup Guideline: Matrix C.A.P. Cleanup Lead: RP SLW/TF SLW/OTF
 (Circle) (Circle)
 Free Product Disposal: _____ Soil Disposal: _____
 Est. Gallons: _____ Est. Cu/Yds: _____
 Resp. Party: _____ Resp. Party: _____
 Disposal Location: _____ Disposal Location: _____
 Removal Date: _____ Removal Date: _____
 Enforcement Action: Y ☐ N ☐ (Circle)
 Cost Recovery Initiated: Y ☐ N ☐ (Circle) Source of Cost Recovery: _____
 Pct. R.P.: _____
 Pct. SLW/TF: _____
 Pct. SLW/OTF: _____
 Estimations: Cost of Cleanup: _____ Staff Time On Project: _____
 Site Management Comments: _____

Closed
1-7-02

NWR UST CLEANUP SITE CHECKLIST (for regional use only)

This site is:

 <40 ppm Matrix

 X

Regulated Tank

 Exempt Tank

 Oil Heat Commission eligible

 Other

(surface spill, non-petroleum UST, etc.)

Assign site to:

 Staff (your initials or staff for major RP)

 Unassigned at this time

(matrix only, soil aeration not anticipated)

 X

Needs to be tracked (supervisor to assign)

Reason: *Problems w/ reporting of contamination*

Action:

 X

Send Initial Letter (with rules)

 Send Modified Letter (without rules)

 Send <40 ppm Letter (without rules)

 No letter required

(sending other letter, etc.)

Regulated Tank Information (Y/N):

 Y

Tanks registered ID No. AKEAD

 Y

Decommissioning notice (30 day) received

 Y

3 day notice received

 Y

Fees current

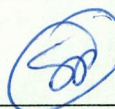
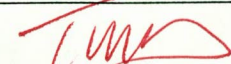
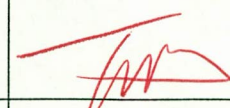
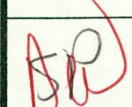
 Y

New tanks to be installed

- AGT

Misc. Notes:

FILE NAME: RSB Forest ProductsLOG NO. 03-92-0138**NWR'S NFA TRACKING CHECKLIST**

ROUTE TO	ACTIVITY	RESPONSIBLE PERSON	DATE COMPLETED
RAH	Sequent checked by project manager to make sure fees paid and tanks closed and that UST compliance issues have been resolved.	RAH	9/14/01
RAH	OTIS updated with soil disposal, public notice, and other applicable information by project manager.	RAH	9/14/01
RAH	Draft NFA prepared by Project Manager (PM) and submitted to NRS-4 Hydro or Manager for review	RAH	8/30/01
—	Draft NFA approved by NRS-4 Hydro (or Manager, if necessary) and submitted for data entry	—	—
SP	SEQUENT updated with final invoice request date and new green sheet information.		10/19/01
—	OPTIONAL STEP: Expedited payment request by responsible party (RP) is handled by =====>>		
—	OPTIONAL STEP: Estimated Expedited Payment Amount given to RP by =====>>		
SP	To Administrative staff for cost recovery entries		10/19/01
AUP	Final invoice paid notice received from Business Office and PM informed by Manager	AWP	12/13/01
RAH	Final NFA drafted and signed by PM (and Manager, if necessary), and sent for data entry	RAH	12/31/01
SP	SEQUENT updated with filed closed information.		1-7-02
SP	Proofreading letter and file closure activities		71
	Copies made and mailed	D.W.	1-7-02

NFA PROCESS COMPLETE



Oregon

John A. Kitzhaber, M.D., Governor

Department of Environmental Quality

Northwest Region
2020 SW Fourth Avenue
Suite 400
Portland, OR 97201-4987
(503) 229-5263 Voice
TTY (503) 229-5471

02 January 2002

MR MARK REEVES
RSG FOREST PRODUCTS INC
PO BOX 169
MOLALLA OR 97038

Re: RSG Forest Products
File No. 03-92-0138
Facility ID. No. 4625

Dear Mr. Reeves:

The Department of Environmental Quality (DEQ) has completed its review of the information submitted to date, regarding the underground storage tank (UST) decommissioning and cleanup conducted at 28890 Hwy. 213, PO Box 169 in Molalla, Oregon. The DEQ has determined that the cleanup appears to have met the requirements of Oregon Administrative Rules (OAR) 340-122-205 through 340-122-360 and that no further action is required at this time.

This determination is a result of our evaluation and judgment based on the regulations and facts as we now understand them, including:

1. One 10,000-gallon UST and one 5,000-gallon unregulated UST (shared a common pit cavity) were decommissioned, by removal, at this location. The tanks were recycled at John Charlton in Estacada, Oregon.
2. Up to 980 parts per million (ppm) of diesel-range petroleum hydrocarbon contamination was detected during the decommissioning. Following soil removal up to 1,600 ppm of diesel was detected and additional soil was removed. Approximately, 320 cubic yards of soil were excavated and treated and disposed on-site.
3. After cleanup was complete, a maximum of 27 ppm of diesel was detected. This is below the 500 ppm cleanup level for diesel established for this site.
4. Groundwater was not encountered during the cleanup.



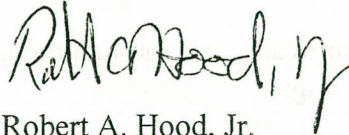
Reeves
02 January 2002
Page 2

The DEQ's determination will not be applicable if new or undisclosed facts show that the cleanup does not comply with the referenced rules. The DEQ's determination also does not apply to any conditions at the site other than the release of the petroleum product specifically addressed in the report(s).

Please note that pursuant to OAR 340-122-360(2), a copy of your report must be retained until ten (10) years after the first transfer of the property. We recommend that a copy of this information be kept with the permanent facility records.

Your efforts to comply with the regulations to ensure that your facility has been adequately cleaned up have been appreciated. If you have any questions, please contact me at (503) 229-5617.

Respectfully,



Robert A. Hood, Jr.
UST Cleanup Specialist

cc: Hans Feige
PNG Environmental, Inc.
7130 SW Elmhurst St.
Tigard, OR 97223

(rah:RAH)

03 92 0138

LEGEND

CL-10

CLOSURE SOIL SAMPLE NUMBER AND APPROXIMATE LOCATION

T-2

TEAR LOCATION SAMPLE NUMBER AND APPROXIMATE LOCATION

STOCKPILE SAMPLE TEST RESULTS AUGUST 1994

CONCENTRATIONS IN PARTS PER MILLION (PPM)
ND NOT DETECTED, BELOW METHOD DETECTION LIMIT
NT NOT TESTED

418.1

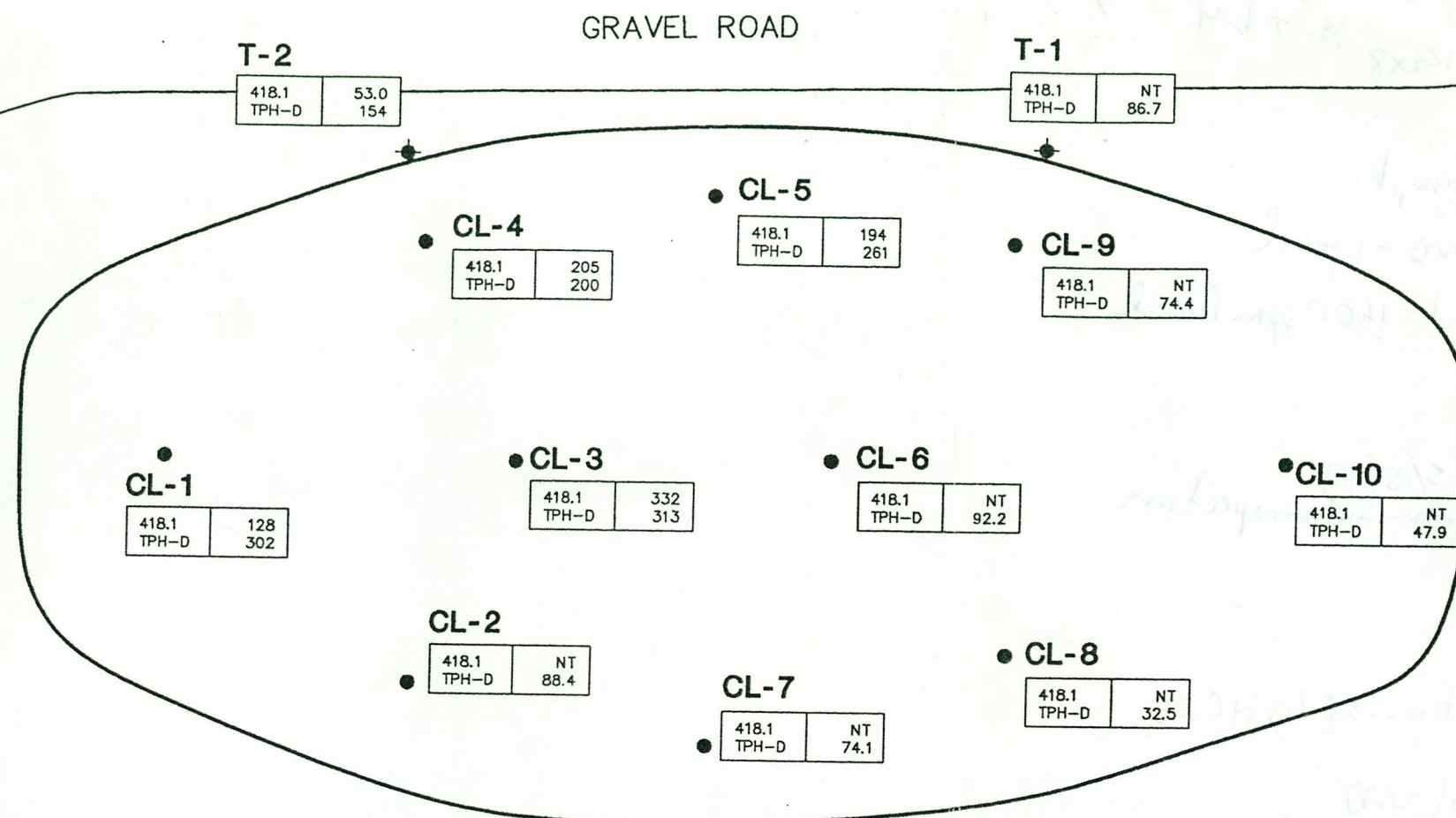
TOTAL PETROLEUM HYDROCARBONS
(BY EPA METHOD 418.1)

TPH-D

TOTAL PETROLEUM HYDROCARBONS
FOR DIESEL (BY EPA METHOD 8015)

418.1 TPH-D	ND ND
----------------	----------

CONCENTRATIONS IN PPM
COMPOUNDS



soil pile OK

NOTES:

1. DEPTHS: 0-3.5 FEET
2. OVERALL DEPTH AVERAGE: 2 FEET
3. TOTAL AREA: 500 CUBIC YARDS

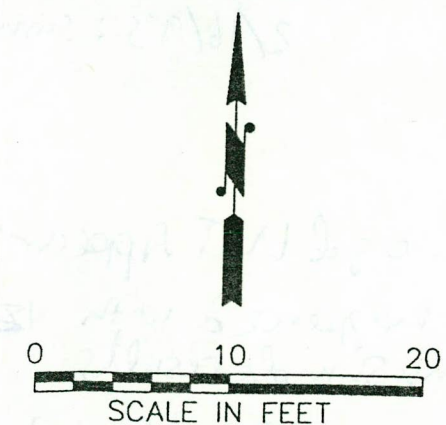


PLATE 2

AGRA
Earth & Environmental
7477 SW Tech Center Drive
Portland, Oregon 97223-8025

W.O. 21-06095-01
DESIGN DRM
DRAWN MJF
DATE AUG 1994
SCALE 1"=10'

RSG FOREST PRODUCTS
28890 HIGHWAY 213
MOLALLA, OREGON 97030

SOIL PILE SAMPLE LOCATIONS

Initial decon Results
H&D - Diesel Detect
A# 600 ppm
B# 980 ppm

Discovered 2nd Tank
No GW in initial pit

USTS
10000 - Diesel 25'x8' 2/92
Sew. Tank 2 - Abandoned many 6/92
years b-4
12 1/2 x 8

Sand Samples
A - NW - Diesel
C - NW - Diesel

1/19/93 - B - hit 1600 ppm Diesel

~320 yds pcs removed

Stockpiled on site not secured 5/18/93
Soil Aerobic - had inspection
rept.

6/24/94 NW:

1/26/93: Sample A: pit Bottom: NO by H&D
removed more soil

2/16/93: Sample #1 Diesel - NW
#2 27 ppm Diesel
22 ppm Diesel - duplicate

* 10000 gal UST Appears good to close.

* what happened with ~~12~~ 5000 tank
Any sample results

* Distance to Diesel Pump? If look at map, it appears to be
> 20 feet from UST system (10000) which it was hooked up to
need to evaluate

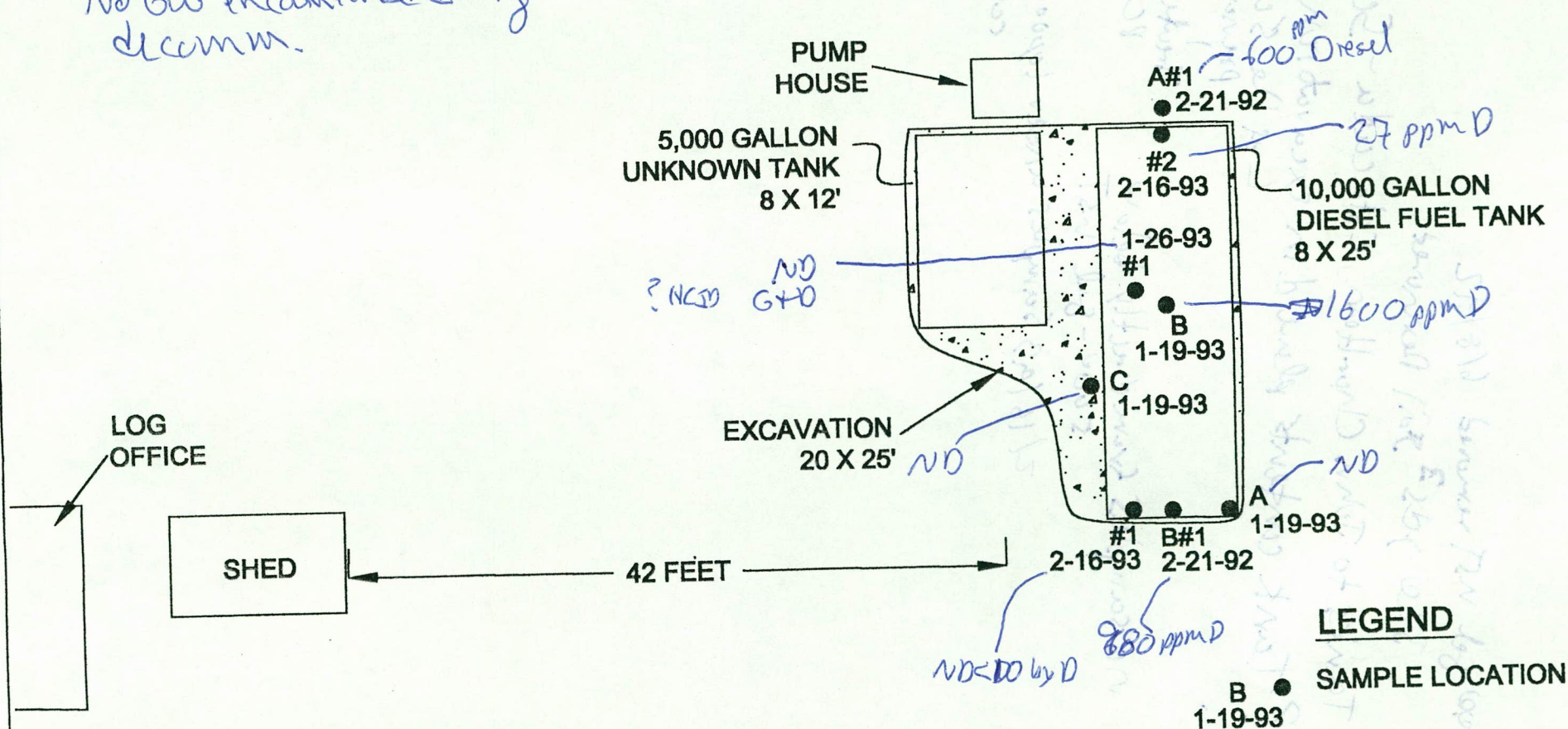
* Scaled Map

* Soil pile

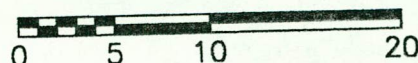
Jerry Koshell
PNG ENV
620 287 = contact
consultant

no samples @ 5000 gal u/s, but
Same pit area,
multiple Tanks in pit

No GW encountered during
decomm.



APPROXIMATE SCALE IN FEET



PNG Environmental, Inc.

7130 SW Elmhurst Street
Tigard, Oregon 97223

(503) 620-2387
FAX (503) 620-2977

CURRENT DATE: 08-07-01
CAD FILE NAME: 85811F1D
DRAWN BY: SB
APPROVED BY: GK

RSG FOREST PRODUCTS CO.
MOLALLA, OREGON

FORMER UST LOCATION

Project No.
858-11

Figure No.

1

5000 gal UST removed 6/8/92

320 yds³ soil removed

Tanks to John Charlton, Estacada - Scrapped

? Tank contents placed in excavation?

1 of the 5000 gal - ~~S~~
previously filled
treated on site w/
PCS

no samples from directly below
5000-gal UST

2/16/93 Samples under 10000 gal UST are
confirmation

UST CLEANUP TELEPHONE USE REPORT

CALL FROM/TO: Hans Ferge DATE: 10/18/2001
WITH: PNG TIME: ~1500
TELEPHONE NO: (503) 620-2387
REGARDING: 5,000-gallon UST.
FILE NO: 03-92-0138

SUMMARY OF CALL

Air photos reviewed, could not find any real people from Mill to discuss decommissioning of the 5000-gal. UST. Based on research, it was concluded that the 5,000-gallon UST most likely held gasoline, it was installed prior to 1964 & there is not sure date of in-place decommissioning, but it was at least 20 years ago.

Ruth C. [Signature]
Staff Signature

HOOD Robert

From: Hans Feige [hfeige@pngenv.com]
Sent: Monday, September 24, 2001 11:28 AM
To: HOOD Robert
Subject: Molalla UST at RSG

03 92 0138
RSG Forest Prod.

I haven't forgotten you. I am going to look at some air photos we have and try to better get a date window for the install of those tanks. Also, I might not have been correct in saying that the 5K tank was decommissioned when the 10K tank was installed. It might actually be that the 5K and 10K were installed at the same time and the 5K taken out of service prior to the 10K. There were a couple different mill owners around those times and changes of staff, so no luck on calling up old guys.

I should be able to review stuff in a couple of days and give you a call.

~~~~~  
Hans P. Feige  
PNG Environmental, Inc.  
hfeige@pngenv.com

This message is private or privileged. If you are not the person for whom this message is intended, please delete it and notify me immediately, and please do not copy or send this message to anyone else



## ***PNG ENVIRONMENTAL, INC.***

---

August 24, 2001

858-11

Mr. Robert Hood, Jr.  
Oregon Department of Environmental Quality  
Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, Oregon 97201-4987

Subject: **Response to Questions**  
File No. 03-92-0138  
RSG Forest Products  
28890 Highway 213  
Molalla, Oregon

Dear Mr. Hood:

This letter is in response to your letter dated March 30, 2001, regarding the decommissioning of a diesel fuel underground storage tank (UST) at the RSG Forest Products (RSG) Mill on Highway 213 in Molalla, Oregon. This response is based on information available in RSG and DEQ files for the tank decommissioning at the site, an interview with Mark Reeves, and a site visit.

The following chronology is based on the review of the DEQ files:

- The 10,000 gallon, diesel fuel UST (Facility ID 4625, Tank #AKEAD) was decommissioned by excavation and removal on February 20, 1992.
- DEQ was notified of evidence of a release on February 21, 1992.
- A 5,000 gallon UST previously decommissioned in place was discovered during decommissioning activities for the 10,000 gallon UST.
- The 5,000 gallon UST was removed on June 8, 1992.
- Impacted soil was removed from the excavation in January and February 1993. Approximately 320 cubic yards of soil were removed from the excavation and stored onsite on a plastic liner.
- In 1994, a soil treatment cell was constructed on a log deck. DEQ authorized re-use of soil, after treatment of the soil, as part of a log deck.

The following comments respond to the questions in your letter.

**1. 10,000 Gallon Tank Sampling.** No response required.

**2. 5,000 Gallon Tank Removal**

The 5,000 gallon UST was discovered during decommissioning activities of the 10,000 gallon UST. The 5,000 gallon tank had been previously decommissioned in-place and had been filled with sand. The 5,000 gallon tank was located parallel to the 10,000 gallon UST in a common cavity.



The tank was removed from the excavation in June 1992. The tank was cut open and the contents of the tank were placed in the excavation. Both the 5,000 gallon tank and the previously removed 10,000 gallon tank were removed from the site and scrapped by John Charlton, Estacada, Oregon.

No soil samples were collected from directly below the 5,000 gallon tank during removal activities. Samples were collected from the base of the cavity following the removal of the 10,000 gallon tank and removal of soil from the common cavity. The results of that sampling are shown in Table 1. Soil samples were collected from the base of the cavity following several soil removal actions. The samples collected on February 16, 1993 were confirmation samples collected following the completion of excavation activities. The sand from the tank was removed from the cavity, along with other soil removed from the cavity, placed in the on-site soil treatment cell during remedial activities and treated in the soil treatment cell.

### **3. Scaled Maps**

A scaled map of the UST excavation is not available. Based on the volume of soil excavated (320 cubic yards) and the volume of the 10,000 gallon tank, the footprint of the excavation was approximately 25 feet by 20 feet. The excavated material included the sand from the 5,000 gallon tank. The excavation was basically a cut in the hillside, with sidewalls approximately 14 to 18 feet in the rear portion of the excavation, and 10 to 12 feet in the front portion of the excavation.

The location of the excavation of the 10,000 gallon UST in relation to the diesel pump house is shown in a photograph as part of the DEQ UST Field Inspection Report dated 5-19-92 located in the DEQ files. The photograph was taken prior to the removal of the 5,000 gallon tank, which was still in-place directly behind the pump house. Based on this photograph, the pump house does not appear to be greater than 20 feet from the excavation.

Following the excavation of the impacted soil, the excavation was filled and the area contoured. Photographs 1 and 2 from May 2001 show the area of the former UST cavity. Photograph 1 is looking south-southeast, up the slope where the UST was located.

The log office, mentioned in the DEQ UST Field Inspection Report, is behind the tree in the center of the Photograph. Photograph 2 is looking north-northeast down the slope toward the area of the former pump house. The tree from Photograph 1 is on the left in Photograph 2.

An approximately scaled map with the locations of the soil samples is shown on Figure 1. The map was constructed from the review of the files and should be considered approximate.

The drums that can be seen in the other photographs in the inspection report have been removed from the area and the contents disposed during other remedial activities conducted at the site in 1996.



#### 4. Soil Treatment Cell

The soil from the UST excavation was treated in a cell located on a vacant log deck west of the log office. In 1994, DEQ authorized reuse of the soil as part of the log deck. By the time of our May 2001 site visit, the soil treatment cell had been spread over an area of the log deck and incorporated into the log deck. Photograph 3 shows the location of the log deck in relation to the former UST area.

The log office (blue building) and the log loader from Photograph 3 are in the background of the photograph. Photograph 4 also shows the log deck with the treated soil. Grass and shrubs are being established on the deck.

RSG personnel and equipment were used to spread out the soil. The soil contained a large percentage of gravel with cobbles. Additional pit run material was added to complete the decks.

The soil in the treatment cell has been spread out on the log deck. No further activity concerning the former UST has been scheduled.

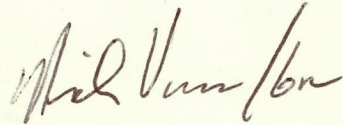
We believe that this information has addressed all of the questions in your letter and provides information sufficient for DEQ to close this file. If you have any questions or require more information, please contact PNG at (503) 620-2387.

Sincerely,

**PNG ENVIRONMENTAL, INC.**



Hans Feige, R.G.  
Geologist



Gerard Koschal, R.G.  
Senior Geologist

Attachments: Table 1 – Soil Analytical Results  
Figure 1 – Former UST Location  
Photograph 1 – Former UST Area  
Photograph 2 – Former UST Area  
Photograph 3 – Log Deck  
Photograph 4 – Log Deck

cc: Mr. Mitch Karp, RSG Forest Products Company  
Mr. Jim Benedict, Cable, Huston, Benedict, Haagensen & Lloyd, LLP



**Table 1**  
**Soil Analytical Results**  
RSG Forest Products Company  
Molalla, Oregon

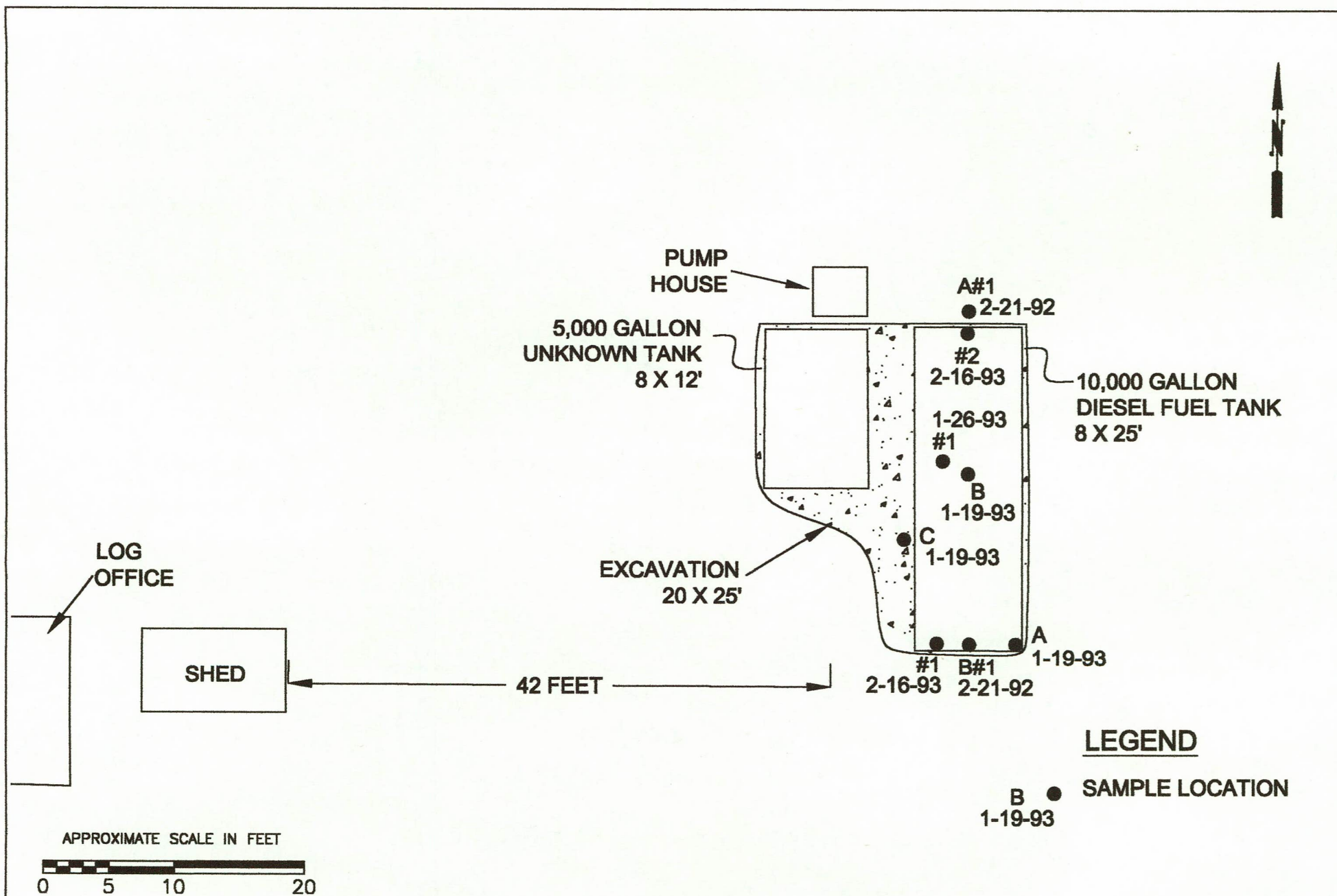
| Sample Identification | Date Sampled | TPH-HCID |          |     | TPH-G | TPH-D<br>mg/Kg | TPH-Oil |
|-----------------------|--------------|----------|----------|-----|-------|----------------|---------|
|                       |              | Gasoline | Diesel   | Oil |       |                |         |
| A#1                   | 02/21/92     | ND       | Detected | -   | -     | 600            | -       |
| B#1                   | 02/21/92     | ND       | Detected | -   | -     | 980            | -       |
| A                     | 01/19/93     | -        | ND       | -   | -     | -              | -       |
| B                     | 01/19/93     | -        | Detected | -   | -     | 1,600          | -       |
| C                     | 01/19/93     | -        | ND       | -   | -     | -              | -       |
| A                     | 01/26/93     | ND       | ND       | -   | -     | -              | -       |
| 1                     | 02/16/93     | -        | -        | -   | -     | <10            | -       |
| 2                     | 02/16/93     | -        | -        | -   | -     | 27             | -       |

**Notes:**

mg/Kg = Milligrams per kilogram

- = Not sampled for this parameter





### LEGEND

B ● SAMPLE LOCATION  
1-19-93

**PNG Environmental, Inc.**

7130 SW Elmhurst Street  
Tigard, Oregon 97223

(503) 620-2387  
FAX (503) 620-2977

CURRENT DATE: 08-07-01  
CAD FILE NAME: 85811F1D  
DRAWN BY: SB  
APPROVED BY: GK

**RSG FOREST PRODUCTS CO.**  
**MOLALLA, OREGON**

**FORMER UST LOCATION**

Project No.  
**858-11**

Figure No.  
**1**





**PNG Environmental, Inc.**

7130 SW Elmhurst Street  
Tigard, Oregon 97223

(503) 620-2387  
FAX (503) 620-2977

CURRENT DATE: 08-07-01  
CAD FILE NAME: 85811P1  
DRAWN BY: SB  
APPROVED BY: GK

**RSG FOREST PRODUCTS CO.**  
**MOLALLA, OREGON**

**MAY 2001**  
**FORMER UST AREA**

Project No.  
**858-11**

Figure No.

**1**





**PNG Environmental, Inc.**

7130 SW Elmhurst Street  
Tigard, Oregon 97223

(503) 620-2387  
FAX (503) 620-2977

CURRENT DATE: 08-07-01  
CAD FILE NAME: 85811P1  
DRAWN BY: SB  
APPROVED BY: GK

**RSG FOREST PRODUCTS CO.  
MOLALLA, OREGON**

**MAY 2001  
FORMER UST AREA**

Project No.  
**858-11**

Figure No.  
**2**





**PNG Environmental, Inc.**

7130 SW Elmhurst Street  
Tigard, Oregon 97223

(503) 620-2387  
FAX (503) 620-2977

CURRENT DATE: 08-07-01  
CAD FILE NAME: 85811P3  
DRAWN BY: SB  
APPROVED BY: GK

**RSG FOREST PRODUCTS CO.**  
**MOLALLA, OREGON**

**MAY 2001**  
**LOG DECK**  
**WITH TREATED SOIL**

Project No.  
**858-11**

Figure No.  
**3**





**PNG Environmental, Inc.**

7130 SW Elmhurst Street  
Tigard, Oregon 97223

(503) 620-2387  
FAX (503) 620-2977

CURRENT DATE: 08-07-01  
CAD FILE NAME: 85811P4  
DRAWN BY: SB  
APPROVED BY: GK

**RSG FOREST PRODUCTS CO.  
MOLALLA, OREGON**

**LOG DECK  
WITH TREATED SOIL  
MAY 2001**

Project No.  
**858-11**

Figure No.

**4**





# Oregon

John A. Kitzhaber, M.D., Governor

## Department of Environmental Quality

Northwest Region  
2020 SW Fourth Avenue  
Suite 400  
Portland, OR 97201-4987  
(503) 229-5263 Voice  
TTY (503) 229-5471

20 August 2001

MR MARK REEVES  
RSG FOREST PRODUCTS INC  
PO BOX 169  
MOLALLA OR 97038

Re: RSG Forest Products  
File No. 03-92-0138

Dear Mr. Reeves:

In a letter dated 30 March 2001, the Department of Environmental Quality (DEQ) requested the submittal of additional information, regarding the underground storage tank (UST) cleanup at 28890 Hwy 213, PO Box 169 in Molalla, Oregon. Based on a conversation with PNG Environmental, Inc., the DEQ was informed that the issues were being addressed. The DEQ has yet to receive this information. Please submit by **12 September 2001**, so I may complete the initial project review process.

If you have any questions, please call me at (503) 229-5617.

Respectfully,

Robert A. Hood, Jr.  
UST Cleanup Specialist

(rah:RAH)







# Oregon

John A. Kitzhaber, M.D., Governor

## Department of Environmental Quality

Northwest Region  
2020 SW Fourth Avenue  
Suite 400  
Portland, OR 97201-4987  
(503) 229-5263 Voice  
TTY (503) 229-5471

30 March 2001

MR MARK REEVES  
RSG FOREST PRODUCTS INC  
PO BOX 169  
MOLALLA OR 97038

Re: RSG Forest Products  
File No. 03-92-0138

Dear Mr. Reeves:

The Department has taken this project off its backlog and has assigned a project manager for regulatory oversight, regarding the underground storage tank (UST) cleanup at 28890 Hwy 213, PO Box 169 in Molalla, Oregon. Although you have not signed up for the cost recovery program, you will be invoiced for the Department's project manager's oversight. The Department requests that the following items be submitted so the project review process may be finalized:

- Based on information submitted regarding the former 10,000-gallon diesel UST, confirmation sampling indicates that up to 27 parts per million (ppm) of diesel-range petroleum hydrocarbons were detected. This level is below the Department's Level II Cleanup Standard of 500 ppm. It appears that additional investigation is not necessary in this area.
- In the vicinity of the 5,000-gallon UST, the Department has not been informed whether or not this UST was removed or remains in-place, whether or not soil samples were collected for analyses, and of the results of these analyses. Please provide this information to the Department.
- The original site map was not approximately scaled as required. Please provide an approximately scaled site map and show all soil sampling locations, including results and depths of samples, and limits of the excavation. Also, based on the site map, it appears that the diesel pump area was located greater than 20 feet from the 10,000-gallon diesel UST. Please indicate the correct distance.
- According to the Department's most recent site inspection (29 September 1994), the stockpiled soil that was aerated on-site had not been re-used as indicated by the AGRA Earth & Environmental report dated 12 September 1994. Please indicate when the treated soil was moved to its proposed permanent location. Also, it will be necessary to provide information that this actually occurred, site maps, photos, or receipts of work completed by the company hired to do the work.

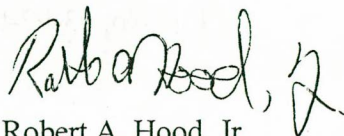




Reeves  
30 March 2001  
Page 2

Please submit this information by **23 April 2000**. If you have any questions, please call me at (503) 229-5617.

Respectfully,



Robert A. Hood, Jr.  
UST Cleanup Specialist

cc: Chuck Esler  
AMEC  
7477 SW Tech Center Drive  
Portland, OR 97223-8025  
(rah:RAH)





# Oregon

John A. Kitzhaber, M.D., Governor

April 20, 2000

## Department of Environmental Quality

Northwest Region  
2020 SW Fourth Avenue  
Suite 400  
Portland, OR 97201-4987  
(503) 229-5263 Voice  
TTY (503) 229-5471

MARK REEVES  
RSG FOREST PRODUCTS INC  
PO BOX 169  
MOLALLA OR 97038

Re: RSG FOREST PRODUCTS  
File No.: 03-92-0138

The purpose of this letter is to provide an update on your underground storage tank (UST) cleanup project, located at 28890 HWY 213, P.O. BOX 169 in MOLALLA, Oregon, and to inform you of some changes to the DEQ's program. You are receiving this letter because you or your contractor reported a release from the UST system at this property and because the DEQ has not assigned your project to a project manager or closed out your file. File closure occurs when cleanup has met the appropriate requirements and the DEQ has reviewed the reports and issued a "no further action" (nfa) letter.

### BACKLOGGED PROJECTS

The DEQ's first priority is to work on projects that pose the highest threat to human health or the environment. Due to staffing limitations, not all projects are assigned to project managers for review and are placed on DEQ's backlog of work needing to be completed.

To accommodate people who do not want to (or cannot) wait years for the DEQ to work down its list of priorities, the DEQ has set up a program by which responsible parties can request oversight. Filling out and signing a "cost recovery agreement" does this. By signing this document, the responsible party agrees to work with the DEQ in resolving the cleanup issues and agrees to pay the oversight costs which DEQ is required by law to collect.

Once a "cost recovery agreement" has been received for a project, DEQ places the project on a waiting list for assignment to the next available project manager. How long this takes depends on a lot of factors including current DEQ staffing and the number of high priority projects that need to be dealt with. In the past, it has taken up to two years for DEQ project managers to be assigned to a project. Currently the wait is about six months for more complicated projects. If there is an immediate need (i.e. a property transaction pending) for DEQ review, projects are usually assigned within two to four weeks.



Backlog letter

Page 2

## NEW PROGRAM INFORMATION

In November 1998, revised rules went into effect for UST Cleanups. These rules included housekeeping items as well as rules governing low impact sites (LIP) and for developing generic remedies. These rules are available at the DEQ's website (<http://www.deq.state.or.us/wmc/tank/200rules.htm>) or can be obtained from the Northwest Region office.

Guidance for LIP sites was prepared in December 1998. Copies of this guidance are available at the DEQ's website (<http://www.deq.state.or.us/wmc/tank/lisguid.htm>) or from the Northwest Region office.

During 1999, DEQ developed a generic remedy for risk based assessments. The generic remedy and guidance document was finalized on September 29, 1999. Copies of this guidance are available at the DEQ's website ([http://www.deq.state.or.us/wmc/tank/rbdrm\\_notice.htm](http://www.deq.state.or.us/wmc/tank/rbdrm_notice.htm)) or from the Northwest Region office. This document replaces the DEQ's "Interim Guidance On Incorporating Risk Based Corrective Action For Petroleum Release Sites" (April 1996).

Another significant change is that the cleanup levels in Oregon Administrative Rules (OAR) 340-122-242 (4) have been replaced by the risk based screening levels in the risk based generic remedy.

The new rules and guidance apply to new releases and to cleanups that were not completed by the adoption date of the rules and guidance. If your cleanup was completed prior to these dates, or if you were operating under a DEQ *approved* corrective action plan, DEQ will apply the rules in place at the time of the cleanup when conducting our review.

If you have any questions or would like copies of the above referenced documents, please call Tina Leppaluoto at (503) 229-5472.

Sincerely,



Andree Pollock, Manager  
UST Cleanup and Compliance Section

Enclosures: Cost Recovery Agreement

(avp:AVP)



December 18, 1995

Mr. Mark Reeves  
RSG Forest Products  
P. O. Box 169  
Molalla, OR 97038

Re: RSG Forest Products  
Log No. 03-92-0138

Dear Mr. Reeves:

The purpose of this letter is to provide notification that you will be receiving an invoice from the Department of Environmental Quality (DEQ) for costs the DEQ has accrued during oversight activities at the facility listed above. A release of petroleum (a hazardous material) at this site was reported to the DEQ as required by law.

Responsible parties are required to pay costs incurred by DEQ for oversight of investigation and cleanup of spills and releases of hazardous materials (ORS 465.225). This includes both direct and indirect costs. Direct costs include site-specific expenses and legal costs. Examples are: time spent by a project manager conducting a site visit or reviewing a report, or clerical staff starting a file or updating a database.

Indirect costs are general management and support costs accrued by the DEQ which are associated with oversight of this cleanup, but which are not charged as direct, site-specific costs. An example is time associated with processing timesheets and payroll.

The cost(s) you will be invoiced for may have been accrued over the last several years. Due to a large backlog of projects, invoices on low priority projects were delayed. We apologize for any inconvenience this may have caused.

If you have any questions regarding the Department's cost recovery program or your invoice, please contact our Waste Management and Cleanup Division at (503) 229-5812.

Should you have any technical questions about your cleanup project, please contact the Northwest Region's Underground Storage Tank duty officer at (503) 229-5263.

Sincerely,



Richard P. Reiter  
UST Section Manager  
Northwest Region

RPR:m  
SM6336



811 SW Sixth Avenue  
Portland, OR 97204-1390  
(503) 229-5696  
TDD (503) 229-6993  
DEQ-1





E

UST FIELD INSPECTION REPORT

Site Name: RSG Forest Products Date: 9/29/94 Total Time\*: 0.5  
Site Address: 28890 S. Hwy 213, Moballa \*Include inspection, travel, paperwork  
File/Facility No.: OS-92-138 Inspector: Andree Pollock

Others Onsite: \_\_\_\_\_  
include \_\_\_\_\_  
company \_\_\_\_\_  
name \_\_\_\_\_

- Inspection Type
- \_\_\_\_\_ Install/Retro
  - \_\_\_\_\_ Decommission
  - \_\_\_\_\_ UST Facility
  - \_\_\_\_\_ Distrib. Audit
  - \_\_\_\_\_ Cleanup
  - ☒ Soil Aeration
  - \_\_\_\_\_ Complaint
  - \_\_\_\_\_ Excav. Closure
  - \_\_\_\_\_ FAP Application
  - \_\_\_\_\_ (other)
- FAP Site? Y / N

Supervisor License No.: \_\_\_\_\_ (note name with \*\*)

Health & Safety \_\_\_\_\_ Potential Site Hazards \_\_\_\_\_

Hazards Appraised? ☒ Y / N Traffic

Benzene Monitoring? Y / ☒ N (if yes, attach form) (use NOTES if more room needed) FAP Site? Y / N

INSPECTION RESULTS - IN COMPLIANCE? Y / N / NA

↑ Plan View SITE SKETCH X-section of excavation  
N (as appropriate)

PHOTOS TAKEN? Y / ☒ N (attach) SAMPLES TAKEN? Y / ☒ N (attach results)

NOTES (use back of form as necessary)

Soil pile is still in place and has not been spread  
or covered



This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper has some minor blemishes and discoloration, particularly towards the top edge.

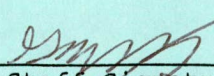


## UST CLEANUP TELEPHONE USE REPORT

CALL FROM/TO: Mark Reeves DATE: 24 Sept 94  
WITH: RSG Forest Products TIME: \_\_\_\_\_  
TELEPHONE NO: ( ) \_\_\_\_\_  
REGARDING: PCS placement  
FILE NO: 03-92-130

### SUMMARY OF CALL

Andree Pollock came by to inspect soil placement site. Mark will move forward with reuse of soil within the next 2 months time. Mark had thought that Andree had approved the placement site.

  
Staff Signature





AGRA Earth & Environmental, Inc.  
7477 SW Tech Center Drive  
Portland, Oregon  
U.S.A. 97223-8025  
Tel (503) 639-3400  
Fax (503) 620-7892

September 12, 1994  
21-06095-01

DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED

SEP 13 1994

Mr. Gregory Toran  
Oregon Department of Environmental Quality  
Northwest Region  
2020 S.W. Fourth Avenue  
Portland, Oregon 97201-4987

NORTHWEST REGION

Dear Mr. Toran:

RE: APPROVAL FOR REUSE OF PETROLEUM CONTAMINATED SOIL (PCS)  
RSG FOREST PRODUCTS, LIBERAL LUMBER COMPANY  
28890 HIGHWAY 213  
MOLALLA, OREGON 97030  
(LUST FILE NO. 03-92-138)

AGRA EARTH AND ENVIRONMENTAL, Inc. (AGRA), is pleased to submit the enclosed letter on behalf of RSG Forest Products (RSG) for the above-referenced site. This letter provides additional information regarding reuse of Petroleum Contaminated Soil (PCS) associated with the previous UST decommissioning project, as outlined in the Oregon Department of Environmental Quality (ODEQ) letter dated August 17, 1994 and a follow-up telephone conversation on August 30, 1994.

## 1.0 FUTURE LOCATION OF PCS

The PCS are presently located along the northeastern portion of the site. (See Plate 1). This area of the site is located on a small knoll and elevated approximately ten feet above the normal site elevation. The surrounding area is used exclusively for log storage and will adequately accommodate additional storage. A security guard is located at the main gate and ensures that only plant and authorized personnel have excess to that area of the site.

## 2.0 REUSE OF PCS (LOG STORAGE DECK)

RSG is requesting to reuse the soils as a base cover material for a proposed expansion of the log storage deck. (See Plate 2). The existing PCS is presently spread out approximately 2 feet thick over an existing wood debris/bark bedding area, which is approximately 2 feet thick. The soil will remain in its present location. The PCS will not come into contact with the shallow groundwater table that is approximately 15 feet below native soil, (i.e. silts and sandy gravel).





RSG is proposing to encapsulate the existing PCS with two layers of rock. The first layer will consist of Pit Run at a depth of approximately 1.5 feet thick. An additional 0.5 foot of 3/4" minus will be placed on top of the Pit Run, ensuring total encapsulation of PCS to a minimum depth of approximately 2 feet.

Log storage will take place on top of the 3/4" minus. Since the PCS will be encapsulated and used as a base material within the log deck area, physical contact with the impacted soil will be restricted and the area will remain protective of human and animal health.

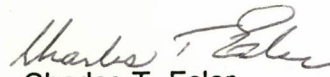
Hopefully this additional information has been helpful and if you have additional questions, please do not hesitate to contact us at (503) 639-3400.

Respectfully submitted,

**AGRA E & E, Inc.**



Denny Macomber  
Hazardous Waste Specialist



Charles T. Esler  
Senior Environmental Scientist





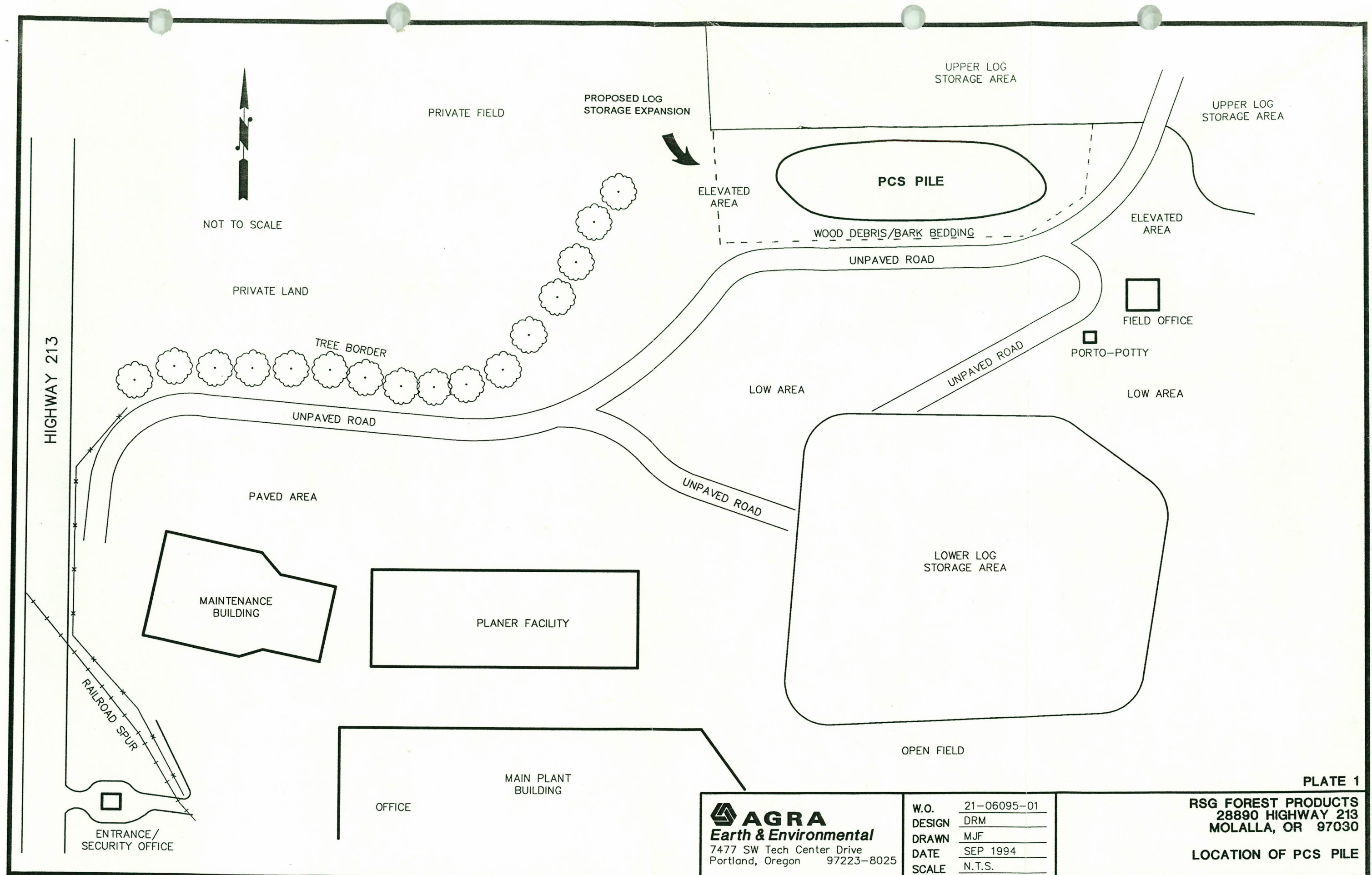


PLATE 1

**AGRA**  
**Earth & Environmental**  
 7477 SW Tech Center Drive  
 Portland, Oregon 97223-8025

|        |             |
|--------|-------------|
| W.O.   | 21-06095-01 |
| DESIGN | DRM         |
| DRAWN  | MJF         |
| DATE   | SEP 1994    |
| SCALE  | N.T.S.      |

**RSG FOREST PRODUCTS**  
 28890 HIGHWAY 213  
 MOLALLA, OR 97030

**LOCATION OF PCS PILE**



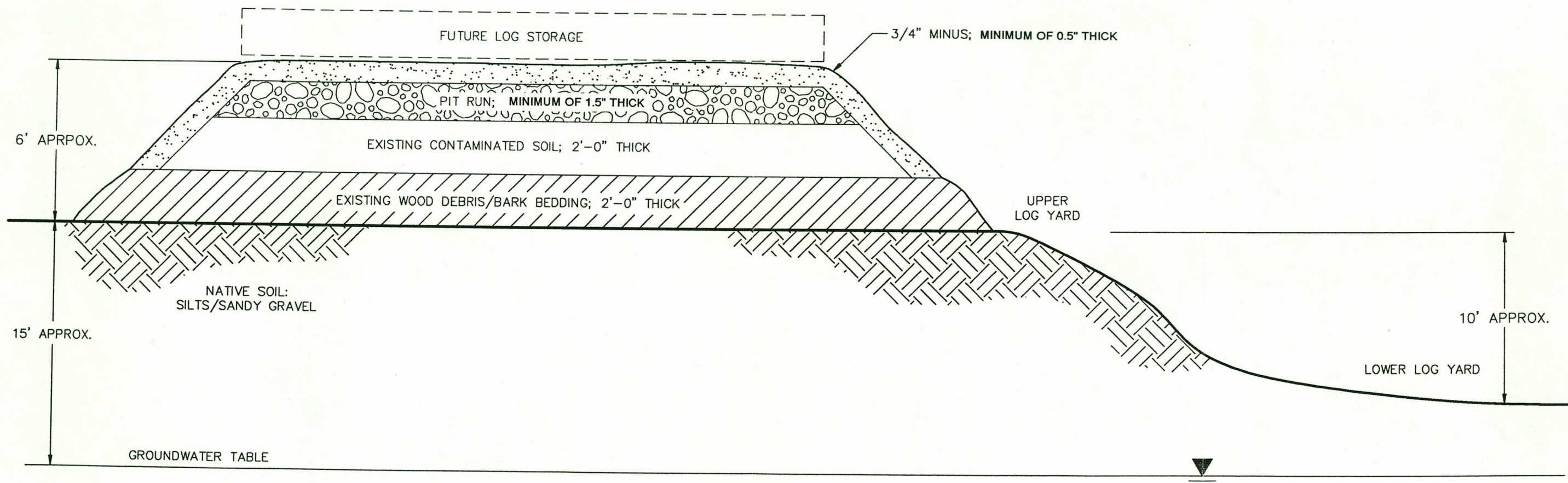


PLATE 2

**AGRA**  
**Earth & Environmental**  
 7477 SW Tech Center Drive  
 Portland, Oregon 97223-8025

|        |             |
|--------|-------------|
| W.O.   | 21-06095-01 |
| DESIGN | DRM         |
| DRAWN  | MJF         |
| DATE   | SEP 1994    |
| SCALE  | N.T.S.      |

**RSG FOREST PRODUCTS**  
 28890 HIGHWAY 213  
 MOLALLA, OR 97030

**CROSS SECTION OF  
 PROPOSED LOG DECK BAY**





August 12, 1994  
21-06095-01

AGRA Earth & Environmental, Inc.  
7477 SW Tech Center Drive  
Portland, Oregon  
U.S.A. 97223-8025  
Tel (503) 639-3400  
Fax (503) 620-7892

Mr. Gregory Toran  
Oregon Department of Environmental Quality  
Northwest Region  
2020 S.W. Fourth Avenue  
Portland, Oregon 97201-4987

DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED

AUG 17 1994

NORTHWEST REGION

Dear Mr. Toran:

RE: RESULTS OF CLOSURE SAMPLING (LUST FILE NO. 03-92-138)  
RSG FOREST PRODUCTS, LIBERAL LUMBER COMPANY  
28890 HIGHWAY 213  
MOLALLA, OREGON 97030

AGRA EARTH AND ENVIRONMENTAL, Inc. (AGRA), is pleased to submit the enclosed report on behalf of RSG Forest Products (RSG) for the above-referenced site. This report has been prepared to document the results of closure samples collected from the excavated soil pile associated with the previous UST decommissioning project. Sampling was performed on July 27, 1994. This report is submitted as per your request and serves as an acknowledgement of RSG's compliance with the items mentioned in detail in your previous Notice of Non-Compliance letters dated June 24th and July 11, 1994.

Following our conversation on Wednesday, August 10, 1994 we performed a Soil Clean-up Matrix Level evaluation for the site. Based on that evaluation it appears that the site qualifies as a Level 2 site with a clean-up standard for diesel of 500 ppm. Based on our final soil sampling event with no detectable concentrations of petroleum hydrocarbon constituents (i.e. diesel) above the ODEQ Soil Clean-up Matrix Level 2, we are requesting final soil deposition authorization and site closure. Following your approval the soils will be spread out and used as a cover material within the log deck storage area. RSG will ensure that the treated soils will not come into contact with the shallow groundwater table.

If you have any questions regarding this report, or if you require additional information, please do not hesitate to contact us at (503) 639-3400.

Sincerely,

AGRA Earth and Environmental, Inc.

  
Denny Macomber  
Hazardous Waste Specialist

  
Charles T. Esler  
Senior Environmental Scientist





**RESULTS OF CLOSURE SAMPLING  
(LUST FILE NO. 03-92-138)**

**RSG FOREST PRODUCTS, LIBERAL LUMBER COMPANY  
28890 HIGHWAY 213  
MOLALLA, OREGON 97030**

**Submitted To:**

**Oregon Department of Environmental Quality  
Northwest Region  
2020 S. W. Fourth Avenue  
Portland, Oregon 97201-4987**

**Submitted By:**

**AGRA Earth and Environmental, Inc.  
7477 S. W. Tech Center Drive  
Portland, Oregon 97223-8024**

**21-06095-01**

**August 1994**





## 1.0 INTRODUCTION

AGRA Earth and Environmental, Inc. (AGRA) has prepared this final report on behalf of RSG Forest Products to document the results of the closure samples collected from the excavated soil pile associated with the previous UST decommissioning project. Sampling was performed on July 27, 1994 at the subject site. The site is located at 28890 Highway 213 in Molalla, Oregon (Plate 1 - Site Vicinity Map).

This report has been prepared for the exclusive use of RSG Forest Products, for the specific application to this project in accordance with generally accepted geological and environmental engineering practices.

## 2.0 BACKGROUND

On February 17, 1992, Jeff Tyseling Enterprises was contracted to provide decommission services for RSG at the Liberal Mill Site. Services were to include removing two Underground Storage Tanks (UST's) on-site, one 10,000 gallon diesel tank and one 5,000 gallon previously abandoned diesel tank. In addition Mr. Tyseling reportedly was to complete and submit to ODEQ all the necessary permits and documents in a timely manner. Mr Tyseling was to provide if necessary proper treatment or disposal services for encountered impacted soil.

On June 16, 1994 a representative from ODEQ visited the site and noted that RSG had failed to acquire a solid waste Letter of Authorization from ODEQ, and was not properly managing the soil pile on-site. ODEQ issued a Notice of Non-compliance Letter dated June 24, 1994, informing RSG of two violations of the ODEQ's rules concerning the treatment of petroleum contaminated soils. In order to correct these violations, RSG was asked to perform the following:

- 1) Place contaminated soil on plastic, establish a berm around the soil and cover it to prevent problems associated with run-on and run-off.
- 2) Make plans to dispose of the soil at an approved landfill or processing facility and give notice to the Department in writing of when this will take place. This soil must be properly disposed of by no later than August 15, 1994. Disposal documents are due [back to the Department] by August 30, 1994.
- 3) Submit a report updating the Department on what soil treatment activity has occurred from the time of the soil excavation to the present.
- 4) It will be necessary to take soil samples for analysis from those areas where contaminated soil was stockpiled without the benefit of an effective liner. You must submit a plan outlining how this will be accomplished by July 11, 1994.

On June 30, 1994, AGRA on behalf of RSG Forest Products, submitted a report addressing the two violations issued by ODEQ for the Liberal Mill site located in Molalla, Oregon. This



letter outlined the four conditions that would be carried out by the August 30, 1994 deadline. ODEQ issued a response letter dated July 11, 1994 and provided additional clarification regarding the minimum number of soil samples to be collected from both the soil pile and the area where it was noted during their site visit that the liner had been damaged. The ODEQ also indicated that the soil samples were to be analyzed by ODEQ method TPH-D. And the results of those soil samples were to be forwarded to the Department by August 15, 1994.

### **3.0 STOCKPILED SOILS**

On July 6, 1994, the stockpiled soil on site was leveled and rebuilt to a depth of approximately two feet, which allowed for the soils to aerate and allowed for the collection of closure samples. The soils were placed on visqueen and a three foot berm was constructed to prevent uncontrolled runoff.

### **4.0 CLOSURE SAMPLING**

Closure samples were collected on July 27, 1994 from the soil pile and two areas where the visqueen liner had been damaged. Refer to Plate 2 for sample locations. Soil sampling procedures are included in Appendix A. Laboratory analytical reports and chain of custody documentation are included in Appendix B.

Previous HCID test results confirmed the presence of diesel. Low levels of diesel constituents were identified in 12 soil samples (CI-1 thru CI-10 and T-1 and T-2). Five of the 12 samples exceeded the most stringent ODEQ Soil Matrix Clean-up Level for diesel (i.e. 100 ppm). However, following our conversation on August 10, 1994 and our performing a Soil Clean-up Matrix Level evaluation for the site, no sample exceeded the ODEQ Soil Clean-up Matrix Level 2 for diesel (i.e. 500 ppm) calculated for this site.

Prior to our conversation and our Soil Clean-up Matrix Level evaluation, additional testing was conducted on five of the 12 samples. EPA Method 418.1 was used after a review of the chromatograph indicated that several of the samples could have been contaminated with organic wood debris, since organic wood debris is noted for its ability to give false hits for diesel constituents. Additional testing results concluded that four of the five samples did contain low levels of diesel. Sample T-2 results dropped significantly from 154 ppm to 53.0 ppm, which seemed indicative of organic material present in this sample.

A summary of diesel analytical data for samples collected on July 27, 1994 is presented below in Table 1.



**TABLE 1**  
**SOIL ANALYTICAL DATA**  
**ODEQ Method TPH-D & 418.1**  
**All results are presented in ppm**

| Location | Sample Date | Diesel (TPH-D) | Diesel (418.1) | Sample Depth |
|----------|-------------|----------------|----------------|--------------|
| CI-1     | 07/27/94    | 302            | 128            | 12" to 18"   |
| CI-2     | 07/27/94    | 88.4           | N.T.           | 18" to 24"   |
| CI-3     | 07/27/94    | 313            | 332            | 12" to 18"   |
| CI-4     | 07/27/94    | 200            | 205            | 12" to 18"   |
| CI-5     | 07/27/94    | 261            | 194            | 12" to 18"   |
| CI-6     | 07/27/94    | 92.2           | N.T.           | 12" to 18"   |
| CI-7     | 07/27/94    | 74.1           | N.T.           | 18" to 24"   |
| CI-8     | 07/27/94    | 32.5           | N.T.           | 18" to 24"   |
| CI-9     | 07/27/94    | 74.4           | N.T.           | 12" to 18"   |
| CI-10    | 07/27/94    | 47.9           | N.T.           | 12" to 18"   |
| T-1      | 07/27/94    | 86.7           | N.T.           | 0" to 3"     |
| T-2      | 07/27/94    | 154            | 53.0           | 0" to 3"     |

(Note: N.T. - Not Tested)

## **5.0 SOIL MATRIX CALCULATION**

The ODEQ has established a Numeric Soil Clean-up Matrix (Oregon Administrative Rules (OAR) 340-122-301 to 340-122-360) for sites at which leaking underground storage tank systems have impacted the soils. In order to determine remediation target levels for petroleum contaminated soils, the matrix score for the site has been evaluated. The matrix score is determined by evaluation of five parameters provided in OAR 340-122-330 (1)-(5): (1) Depth to groundwater, (2) Mean annual precipitation, (3) Soil Type, (4) Sensitivity of the uppermost aquifer, and (5) Potential receptors. Based on data presented above, the site's matrix score would be as follows:

### **1) Depth to groundwater**

The groundwater level at wells in the immediate vicinity of this site are between 5 and 10 feet below ground surface. Groundwater levels at less than 25 feet of depth score a "10."

### **2) Mean annual precipitation**

Based on climatological data for the Molalla area (Average Portland Area Precipitation 1967 - 1982, Average Precipitation Map, BPA), the mean annual precipitation is 45 inches. This results in a score of "5."



**3) Soil type**

Based on the soil type of the soil pile, silts and sandy gravels, we assign a rating of "10."

**4) Sensitivity of the uppermost aquifer**

Water well reports indicated that domestic water wells located in the immediate area are 45 feet or greater. The water table aquifer is not currently used for drinking water, however the quality is such that it could be used for drinking water. This results in a score of "4".

**5) Potential Receptors**

- (a) Based on the distance to the nearest beneficial use well, and taking into account the regional and local groundwater migration direction and gradient, the distance descriptor would be considered "near."
- (b) The number of people at risk, based on population of the area with two miles of the site which is served by drinking water wells would be deemed to be "medium."
- (c) The combination of these two factors would give the site a score of "10."

The total score for the site would be 39, and Level 2 Numeric Soil Clean-up Standards would therefore apply. This would require site soils to be cleaned up to an 80 parts per million standard for gasoline contamination (as referenced to test method TPH-G) and 500 parts per million standard for diesel (as referenced to test method TPH-D or EPA 418.1).

## **6.0 CONCLUSIONS**

The results of the July 27, 1994 sampling event are summarized below:

- 1) According to analytical method TPH-D, diesel constituents were identified in all 12 samples. Five of the 12 samples were above the most stringent ODEQ Numeric Soil Clean-up Matrix Level for diesel (i.e. 100 ppm) for this site.
- 2) Following our conversation on Wednesday, August 10, 1994 we performed a Soil Clean-up Matrix Level evaluation for the site. Based on that evaluation it appears that the site qualifies as a Level 2 site with a clean-up standard for diesel of 500 ppm. Since all closure soil samples reported concentrations of diesel well below Level 2 clean-up levels, AGRA on behalf of RSG is requesting site closure. Following your approval the soil will be spread out and used as a cover material within the log deck storage area. RSG will ensure that the treated soils will not come into contact with the groundwater table



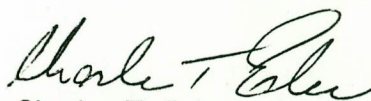
If you have questions or comments regarding this letter, please do not hesitate to contact the undersigned at (503) 639-3400.

Sincerely,

**AGRA Earth and Environmental, Inc.**

A handwritten signature in black ink, appearing to read "Denny Macomber", with a long horizontal flourish extending to the right.

Denny Macomber  
Hazardous Waste Specialist

A handwritten signature in black ink, appearing to read "Charles T. Esler", with a stylized, cursive script.

Charles T. Esler  
Senior Environmental Scientist



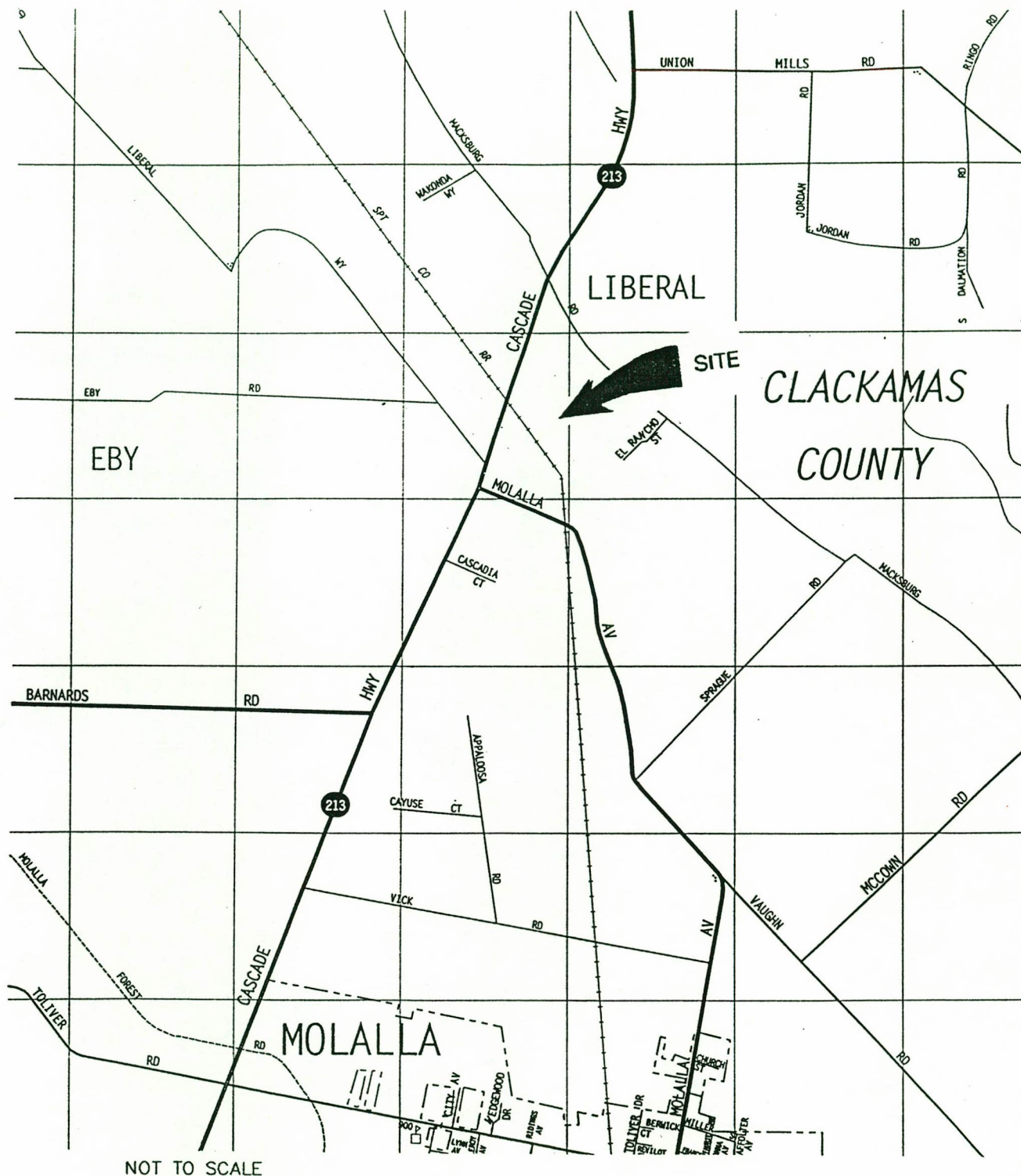


PLATE 1

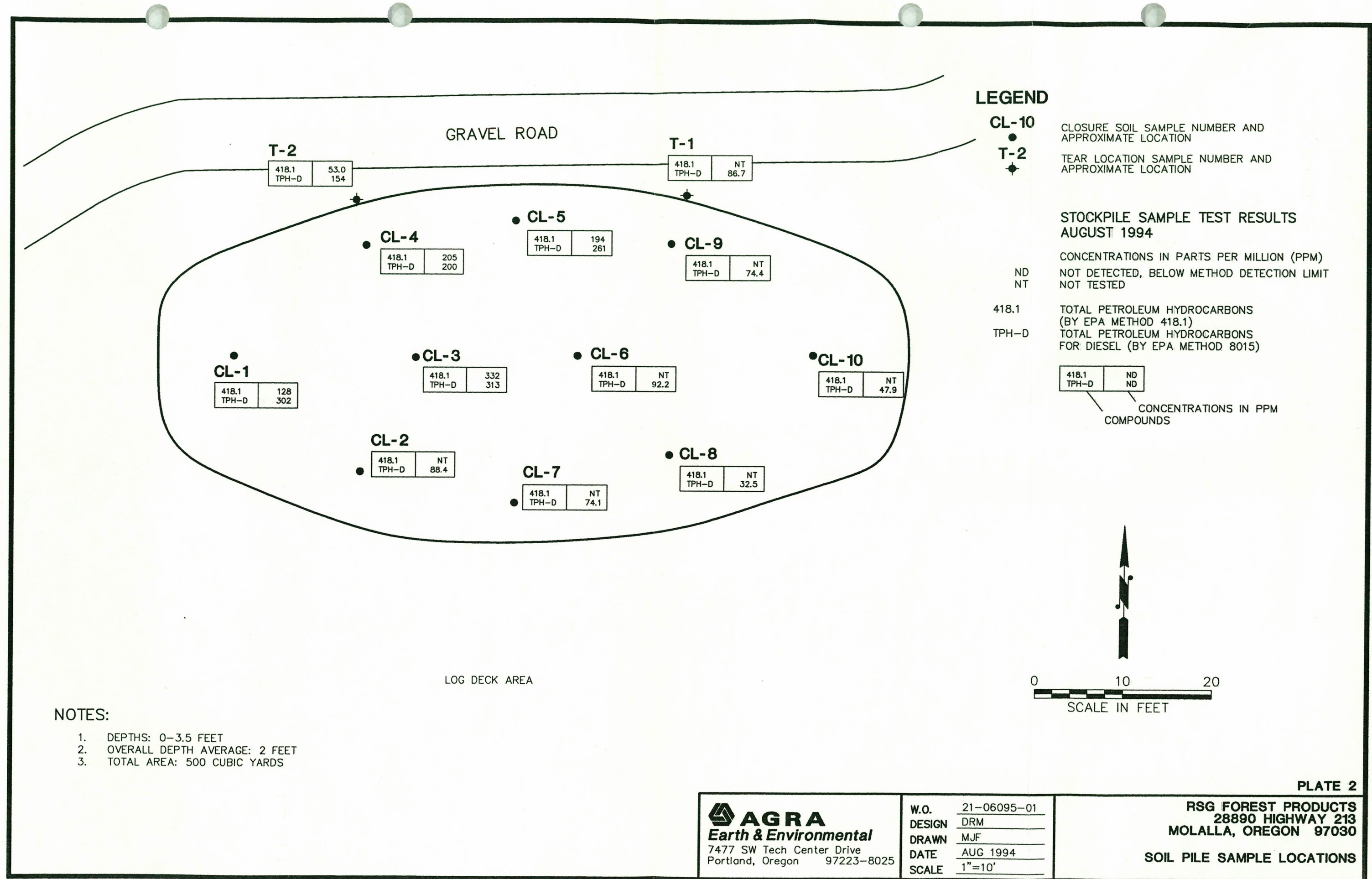
**AGRA**  
**Earth & Environmental**  
 7477 SW Tech Center Drive  
 Portland Oregon 97223-8025

|        |             |
|--------|-------------|
| W.O.   | 21-06095-01 |
| DESIGN | DRM         |
| DRAWN  | MJF         |
| DATE   | AUG 1994    |
| SCALE  | N.T.S.      |

**RSG FOREST PRODUCTS**  
 28890 HIGHWAY 213  
 MOLALLA, OREGON 97030

**SITE LOCATION MAP**





|       |                |             |
|-------|----------------|-------------|
| T-2   | 418.1<br>TPH-D | 53.0<br>154 |
| T-1   | 418.1<br>TPH-D | NT<br>86.7  |
| CL-1  | 418.1<br>TPH-D | 128<br>302  |
| CL-2  | 418.1<br>TPH-D | NT<br>88.4  |
| CL-3  | 418.1<br>TPH-D | 332<br>313  |
| CL-4  | 418.1<br>TPH-D | 205<br>200  |
| CL-5  | 418.1<br>TPH-D | 194<br>261  |
| CL-6  | 418.1<br>TPH-D | NT<br>92.2  |
| CL-7  | 418.1<br>TPH-D | NT<br>74.1  |
| CL-8  | 418.1<br>TPH-D | NT<br>32.5  |
| CL-9  | 418.1<br>TPH-D | NT<br>74.4  |
| CL-10 | 418.1<br>TPH-D | NT<br>47.9  |



## **APPENDIX A**

### **Standard Operating Procedures**

#### **Soil Sampling**



## SOIL SAMPLING PROCEDURES

In situations where shallow soil sampling is required, and soils consist of silt and or sand, hand augering may be utilized. The hand auger apparatus consists of a stainless-steel auger head, extension rod, and a handle manufactured by Art's Manufacturing & Supply, American Falls, Idaho. Extension rods are typically four or five feet long, and additional extension rods can be utilized to sample at depths of greater than five feet. The hand-auger is advanced by rotating the handle in a clockwise manner, and applying downward pressure. Hand-augering allows the continues logging of subsurface materials.

### Procedures

- o Hand-augering equipment (auger head, extension rod, and handle) will be decontaminated with a non-phosphatic detergent solution and deionized water rinse prior to initiating each boring, and prior to the collection of each sample.
- o The desired sampling depth will be achieved by advancing the hand-augered boring with a decontaminated hand auger. The hand-auger will then be decontaminated prior to sample collection. A representative portion of the soils within the sampler will be extracted from the auger head and transferred immediately to the appropriate sample containers with effort to avoid excessive disturbance and volatilization. Care is taken to prevent contact of the sample with the ground or any other surface which has not been decontaminated.
- o The sampling interval is determined by measuring the depth of the boring prior to sample collection and the depth of the boring following sample collection. The difference between these two numbers represents the length of the sampling interval.
- o After collecting the sample, the entire hand-auger apparatus will be decontaminated with a non-phosphatic detergent solution and deionized water rinse. The decontaminated hand-auger will be isolated in a clean area following each decontamination.
- o Samples will be transferred directly into the appropriate container. Containers will then be sealed, wiped clean, labeled, preserved according to analytical requirements, and have all Chain-of-Custody protocols completed.



## **APPENDIX B**

**Analytical Results**

**Chain-of-Custody**



# RZA AGRA, Inc.

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Engineering & Environmental Services

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Portland, Oregon 97223-8024  
(503) 639-3400  
FAX (503) 620-7892

August 12, 1994

AGRA Earth & Environmental, Inc.  
7477 SW Tech Center Drive  
Portland, OR 97223-8024

**Attention: Mr. Denny Macomber**

Dear Mr. Macomber:

RE: Analytical Results For Project 21-06095-01

Attached are the results for the samples submitted on July 28, 1994 from the above referenced project. For your reference, our project number associated with these samples is OR940408.

The samples were analyzed for diesel range petroleum hydrocarbons by ODEQ Method TPH-D and total petroleum hydrocarbons by EPA Method 418.1 Modified at the AGRA Earth & Environmental Portland Chemistry Laboratory.

All analyses were conducted in accordance with applicable QA/QC guidelines. The results apply only to the samples submitted.

Please feel free to contact me if you have any questions regarding this report, or if I can be of any assistance in any other matter.

Respectfully submitted,

**AGRA Earth & Environmental**

  
Sean Gormley  
Laboratory Manager



**AGRA**  
Earth & Environmental Group



# RZA AGRA, Inc.

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Project: RSG Molalla  
Project No.: 21-06095-01  
Project Manager: Denny Macomber  
Sample Matrix: Soil

Service Request No.: OR940408  
Report Date: 8/4/94  
Report No.: 94040802  
C.O.C. No.: 1055/1061

## Total Petroleum Hydrocarbons - Diesel Range ODEQ Method TPH-D (ppm)

| Sample Name  | Lab Code | Sample Date | Analysis Date | Method Detection Limit | Concentration | Surrogate Recovery 2-Fluorobiphenyl |
|--------------|----------|-------------|---------------|------------------------|---------------|-------------------------------------|
| CL-1-072794  | 408-1    | 7/27/94     | 8/2/94        | 25.0                   | 302           | 132                                 |
| CL-2-072794  | 408-2    | 7/27/94     | 8/2/94        | 25.0                   | 88.4          | 138                                 |
| CL-3-072794  | 408-3    | 7/27/94     | 8/2/94        | 25.0                   | 313           | 124                                 |
| CL-4-072794  | 408-4    | 7/27/94     | 8/3/94        | 25.0                   | 200           | 133                                 |
| CL-5-072794  | 408-5    | 7/27/94     | 8/3/94        | 25.0                   | 261           | *                                   |
| CL-6-072794  | 408-6    | 7/27/94     | 8/3/94        | 25.0                   | 92.2          | 140                                 |
| CL-7-072794  | 408-7    | 7/27/94     | 8/3/94        | 25.0                   | 74.1          | 138                                 |
| CL-8-072794  | 408-8    | 7/27/94     | 8/3/94        | 25.0                   | 32.5          | 142                                 |
| CL-9-072794  | 408-9    | 7/27/94     | 8/3/94        | 25.0                   | 74.4          | 133                                 |
| CL-10-072794 | 408-10   | 7/27/94     | 8/3/94        | 25.0                   | 47.9          | 136                                 |
| T1-072794    | 408-11   | 7/27/94     | 8/3/94        | 25.0                   | 86.7          | 131                                 |
| T2-072794    | 408-12   | 7/27/94     | 8/3/94        | 25.0                   | 154           | 145                                 |
| Lab Blank    | 408-MB   | 8/2/94      | 8/2/94        | 25.0                   | ND            | 139                                 |
| Lab Blank    | 408-MB   | 8/3/94      | 8/3/94        | 25.0                   | ND            | 143                                 |

Signature of Chemist

\* Surrogate recovery can not be reported due to target and non-target peaks within the retention time window of the surrogate.

Laboratory Manager

ND Not Detected



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Engineering & Environmental Services

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Portland, Oregon 97223-8024  
(503) 639-3400  
FAX (503) 620-7892

Project: RSG Molalla  
Project No.: 21-06095-01  
Project Manager: Denny Macomber  
Sample Matrix: Soil

Service Request No.: OR940408  
Report Date: 8/10/94  
Report No.: 94040801  
C.O.C. No.: 1055/1061

## Total Petroleum Hydrocarbons by IR EPA Method 418.1 mg/kg (ppm)

| Sample Name | Lab Code | Sample Date | Date Extracted | Date Analyzed | Method Detection Limit | Result |
|-------------|----------|-------------|----------------|---------------|------------------------|--------|
| CL-1-072794 | 408-1    | 7/27/94     | 8/9/94         | 8/9/94        | 4.00                   | 128    |
| CL-3-072794 | 408-3    | 7/27/94     | 8/9/94         | 8/9/94        | 4.00                   | 332    |
| CL-4-072794 | 408-4    | 7/27/94     | 8/9/94         | 8/9/94        | 4.00                   | 205    |
| CL-5-072794 | 408-5    | 7/27/94     | 8/9/94         | 8/9/94        | 4.00                   | 194    |
| T2-072794   | 408-12   | 7/27/94     | 8/9/94         | 8/9/94        | 4.00                   | 53.0   |
| Lab Blank   | 408-MB   | 8/9/94      | 8/9/94         | 8/9/94        | 4.00                   | ND     |

ND Not Detected

Signature of Chemist

Laboratory Manager



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1055

## Chain-of-Custody Record / Laboratory Analyses Request

|                                                           |                                        |                                                                 |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
|-----------------------------------------------------------|----------------------------------------|-----------------------------------------------------------------|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--------------------------------|--|--|--|--|--|-----------------|--|--|--|--|--|--|--|--|--|-------------------------------------------|----------------------------------------|-------------------------|---------------------------------------------|---------------------------|----------------------------------------|------------------------------|---------------------------------------------|--------------------|------------------------|------------------------------|--------------|--------------------|-----------------|----------|--|--|-----------------|----------|
| Project: <u>RSG Molalla</u>                               |                                        | Job #: <u>6045-01</u>                                           |                           | Analysis Requested: (Circle, Check Box, or Write Preferred Method in Box)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Client: <u>RSG</u>                                        |                                        | Project Manager: <u>Danny Macomber</u> Phone #: <u>639-3400</u> |                           | <table border="1"> <tr> <td>Halogenated Volatiles<br/>EPA 601 EPA 8010</td> <td>Volatile Aromatics<br/>EPA 602 EPA 8020</td> <td>BTXE or<br/>BTXE / TPH-G</td> <td>WA. TPH-G or<br/>OR. TPH-G</td> <td>WA. TPH-D or<br/>OR. TPH-D</td> <td>Fuel Scan / TPH by GC<br/>8015-modified</td> <td>GC Fingerprint / HCID</td> <td>WA. 418.1 Modified or<br/>OR. 418.1 Modified</td> <td>GC / MS Volatiles</td> <td>GC / MS Semi Volatiles</td> <td>Total Metals<br/>ICP AA Other</td> <td>TC LP Metals</td> <td>pH Cond. Alk Color</td> <td></td> <td></td> <td></td> <td></td> <td># of Containers</td> <td>Comments</td> </tr> </table> |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  | Halogenated Volatiles<br>EPA 601 EPA 8010 | Volatile Aromatics<br>EPA 602 EPA 8020 | BTXE or<br>BTXE / TPH-G | WA. TPH-G or<br>OR. TPH-G                   | WA. TPH-D or<br>OR. TPH-D | Fuel Scan / TPH by GC<br>8015-modified | GC Fingerprint / HCID        | WA. 418.1 Modified or<br>OR. 418.1 Modified | GC / MS Volatiles  | GC / MS Semi Volatiles | Total Metals<br>ICP AA Other | TC LP Metals | pH Cond. Alk Color |                 |          |  |  | # of Containers | Comments |
| Halogenated Volatiles<br>EPA 601 EPA 8010                 | Volatile Aromatics<br>EPA 602 EPA 8020 | BTXE or<br>BTXE / TPH-G                                         | WA. TPH-G or<br>OR. TPH-G |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  | WA. TPH-D or<br>OR. TPH-D                 | Fuel Scan / TPH by GC<br>8015-modified | GC Fingerprint / HCID   | WA. 418.1 Modified or<br>OR. 418.1 Modified | GC / MS Volatiles         | GC / MS Semi Volatiles                 | Total Metals<br>ICP AA Other | TC LP Metals                                | pH Cond. Alk Color |                        |                              |              |                    | # of Containers | Comments |  |  |                 |          |
| Sampler's Name: <u>Danny Macomber</u> Phone #: <u>" "</u> |                                        | Sampler's Signature: <u>Danny Macomber</u>                      |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Sample I.D. #                                             | Date                                   | Time                                                            | Preserv.                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  | Matrix                                    |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| 1. <u>CL-1-072794</u>                                     | <u>7/27/94</u>                         | <u>11:00</u>                                                    | <u>ice</u>                | <u>soil</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| 2. <u>CL-2-072794</u>                                     |                                        | <u>11:05</u>                                                    |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| 3. <u>CL-3-072794</u>                                     |                                        | <u>11:15</u>                                                    |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| 4. <u>CL-4-072794</u>                                     |                                        | <u>11:25</u>                                                    |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| 5. <u>CL-5-072794</u>                                     |                                        | <u>11:35</u>                                                    |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| 6. <u>CL-6-072794</u>                                     |                                        | <u>11:55</u>                                                    |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| 7. <u>CL-7-072794</u>                                     |                                        | <u>12:05</u>                                                    |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| 8. <u>CL-8-072794</u>                                     |                                        | <u>12:20</u>                                                    |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| 9. <u>CL-9-072794</u>                                     |                                        | <u>12:35</u>                                                    |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| 10. <u>CL-10-072794</u>                                   |                                        | <u>12:45</u>                                                    |                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Relinquished by RZA:                                      |                                        | Relinquished by:                                                |                           | Relinquished by:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  | Laboratory:                    |  |  |  |  |  | Sample Receipt: |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Signature: <u>Danny Macomber</u>                          |                                        | Signature:                                                      |                           | Signature:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Printed Name: <u>Danny Macomber</u>                       |                                        | Printed Name:                                                   |                           | Printed Name:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Firm: <u>RZA AGRA</u>                                     |                                        | Firm:                                                           |                           | Firm:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Date/Time: <u>7/27/94 16:30</u>                           |                                        | Date/Time:                                                      |                           | Date/Time:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Received by:                                              |                                        | Received by:                                                    |                           | Received by:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  | Special Instructions/Comments: |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Signature:                                                |                                        | Signature:                                                      |                           | Signature: <u>Sean Gormley</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Printed Name:                                             |                                        | Printed Name:                                                   |                           | Printed Name: <u>Sean Gormley</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Firm:                                                     |                                        | Firm:                                                           |                           | Firm: <u>RZA AGRA, Inc.</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |
| Date/Time:                                                |                                        | Date/Time:                                                      |                           | Date/Time: <u>7/27/94 16:30</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                |  |  |  |  |  |                 |  |  |  |  |  |  |  |  |  |                                           |                                        |                         |                                             |                           |                                        |                              |                                             |                    |                        |                              |              |                    |                 |          |  |  |                 |          |

DISTRIBUTION: WHITE & PINK returned to project manager, YELLOW - lab.

Page 1 of 1  
SERVICE REQUEST #: 069404108



(Formerly: Rittenhouse-Zeman & Associates, Inc.)

*Engineering & Environmental Services*

7477 SW Tech Center Drive • Portland, OR 97223-8024

(503) 639-3400 • FAX (503) 620-7892

## Chain-of-Custody Record / Laboratory Analyses Request

| Project: RSG- Mo/Alta Job #: 1095-01              |         |       |          |        |  | Analysis Requested: (Circle, Check Box, or Write Preferred Method in Box) |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
|---------------------------------------------------|---------|-------|----------|--------|--|---------------------------------------------------------------------------|----------------------------------------|-------------------------|---------------------------|---------------------------|----------------------------------------|-----------------------|---------------------------------------------|-------------------|------------------------|------------------------------|--------------|--------------------|-----------------|----------|--|--|
| Client: RGG                                       |         |       |          |        |  | Halogenated Volatiles<br>EPA 601 EPA 8010                                 | Volatile Aromatics<br>EPA 602 EPA 8020 | BTXE or<br>BTXE / TPH-G | WA. TPH-G or<br>OR. TPH-G | WA. TPH-D or<br>OR. TPH-D | Fuel Scan / TPH by GC<br>8015-modified | GC Fingerprint / HCID | WA. 418.1 Modified or<br>OR. 418.1 Modified | GC / MS Volatiles | GC / MS Semi Volatiles | Total Metals<br>ICP AA Other | TC LP Metals | pH Cond. Alk Color | # of Containers | Comments |  |  |
| Project Manager: Denny Macomber Phone #: 639-3400 |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| Sampler's Name: Denny Macomber Phone #: 11        |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| Sampler's Signature: [Signature]                  |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| Sample I.D. #                                     | Date    | Time  | Preserv. | Matrix |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| 1. T2-072794                                      | 7/27/94 | 12:55 | ice      | Soc 1  |  |                                                                           |                                        |                         |                           | X                         |                                        |                       |                                             |                   |                        |                              |              |                    | 2               |          |  |  |
| 2. T2-072794                                      | 1       | 13:05 | L        | 1      |  |                                                                           |                                        |                         |                           | X                         |                                        |                       |                                             |                   |                        |                              |              |                    | 2               |          |  |  |
| 3.                                                |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| 4.                                                |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| 5.                                                |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| 6.                                                |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| 7.                                                |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| 8.                                                |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| 9.                                                |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |
| 10.                                               |         |       |          |        |  |                                                                           |                                        |                         |                           |                           |                                        |                       |                                             |                   |                        |                              |              |                    |                 |          |  |  |

| Relinquished by RZA:            |  | Relinquished by: |  | Relinquished by:           |  | Laboratory:                    |  | Sample Receipt:          |  |
|---------------------------------|--|------------------|--|----------------------------|--|--------------------------------|--|--------------------------|--|
| Signature: [Signature]          |  | Signature:       |  | Signature:                 |  |                                |  |                          |  |
| Printed Name:<br>Denny Macomber |  | Printed Name:    |  | Printed Name:              |  | Shipping I.D.#                 |  | Total # Containers:      |  |
| Firm:<br>RZA AGRA               |  | Firm:            |  | Firm:                      |  | Carrier:                       |  | Condition of Containers: |  |
| Date/Time:<br>7/27/94 16:30     |  | Date/Time:       |  | Date/Time:                 |  | DOT Designation:               |  | Condition of Seals:      |  |
| Received by:                    |  | Received by:     |  | Received by:               |  | Special Instructions/Comments: |  |                          |  |
| Signature:                      |  | Signature:       |  | Signature: [Signature]     |  |                                |  |                          |  |
| Printed Name:                   |  | Printed Name:    |  | Printed Name: Sean Gormley |  |                                |  |                          |  |
| Firm:                           |  | Firm:            |  | Firm: RZA AGRA, Inc        |  |                                |  |                          |  |
| Date/Time:                      |  | Date/Time:       |  | Date/Time: 7/27/94 16:30   |  |                                |  |                          |  |



0312-138

## AGRA Earth &amp; Environmental

## FACSIMILE TRANSMITTAL

TO: *Greg Toran*  
COMPANY: *ODEQ NW Region*

AGRA Earth & Environmental, Inc.  
7477 S.W. Tech Center Drive  
Portland, Oregon 97223-8024  
Phone Number (503) 639-3400  
Fax Number (503) 620-7892

FAX NUMBER: *229-6945*  
SENDER: *Deann Macomber*

FILE NO. *6095-01*

FAX OPERATOR:

DATE: *8/12/94*NO. OF PAGES: *18* (including this page)

This transmission is intended only for the Addressee. It may contain privileged or confidential information. Any unauthorized disclosure is strictly prohibited. If you have received this transmission in error, please notify us immediately (collect) so we may correct our transmission. Please then destroy the original. Thank you.





August 12, 1994  
21-06095-01

AGRA Earth & Environmental, Inc.  
7477 SW Tech Center Drive  
Portland, Oregon  
U.S.A. 97223-8025  
Tel (503) 639-3400  
Fax (503) 620-7892

Mr. Gregory Toran  
Oregon Department of Environmental Quality  
Northwest Region  
2020 S.W. Fourth Avenue  
Portland, Oregon 97201-4987

Dear Mr. Toran:

RE: RESULTS OF CLOSURE SAMPLING (LUST FILE NO. 03-92-138)  
RSG FOREST PRODUCTS, LIBERAL LUMBER COMPANY  
28890 HIGHWAY 213  
MOLALLA, OREGON 97030

AGRA EARTH AND ENVIRONMENTAL, Inc. (AGRA), is pleased to submit the enclosed report on behalf of RSG Forest Products (RSG) for the above-referenced site. This report has been prepared to document the results of closure samples collected from the excavated soil pile associated with the previous UST decommissioning project. Sampling was performed on July 27, 1994. This report is submitted as per your request and serves as an acknowledgement of RSG's compliance with the items mentioned in detail in your previous Notice of Non-Compliance letters dated June 24th and July 11, 1994.

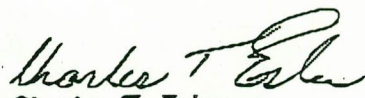
Following our conversation on Wednesday, August 10, 1994 we performed a Soil Clean-up Matrix Level evaluation for the site. Based on that evaluation it appears that the site qualifies as a Level 2 site with a clean-up standard for diesel of 500 ppm. Based on our final soil sampling event with no detectable concentrations of petroleum hydrocarbon constituents (i.e. diesel) above the ODEQ Soil Clean-up Matrix Level 2, we are requesting final soil deposition authorization and site closure. Following your approval the soils will be spread out and used as a cover material within the log deck storage area. RSG will ensure that the treated soils will not come into contact with the shallow groundwater table.

If you have any questions regarding this report, or if you require additional information, please do not hesitate to contact us at (503) 639-3400.

Sincerely,

AGRA Earth and Environmental, Inc.

  
Denny Macomber  
Hazardous Waste Specialist

  
Charles T. Esler  
Senior Environmental Scientist



**RESULTS OF CLOSURE SAMPLING  
(LUST FILE NO. 03-92-138)**

**RSG FOREST PRODUCTS, LIBERAL LUMBER COMPANY  
28890 HIGHWAY 213  
MOLALLA, OREGON 97030**

**Submitted To:**

**Oregon Department of Environmental Quality  
Northwest Region  
2020 S. W. Fourth Avenue  
Portland, Oregon 97201-4987**

**Submitted By:**

**AGRA Earth and Environmental, Inc.  
7477 S. W. Lech Center Drive  
Portland, Oregon 97223-8024**

**21-06095-01**

**August 1994**

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RSG Forest Products, Liberal Mill Site  
Results of Closure Sampling  
Molalla, Oregon

21-06095-01  
August 12, 1994  
Page 1

## 1.0 INTRODUCTION

AGRA Earth and Environmental, Inc. (AGRA) has prepared this final report on behalf of RSG Forest Products to document the results of the closure samples collected from the excavated soil pile associated with the previous UST decommissioning project. Sampling was performed on July 27, 1994 at the subject site. The site is located at 28890 Highway 213 in Molalla, Oregon (Plate 1 - Site Vicinity Map).

This report has been prepared for the exclusive use of RSG Forest Products, for the specific application to this project in accordance with generally accepted geological and environmental engineering practices.

## 2.0 BACKGROUND

On February 17, 1992, Jeff Tyseling Enterprises was contracted to provide decommission services for RSG at the Liberal Mill Site. Services were to include removing two Underground Storage Tanks (UST's) on-site, one 10,000 gallon diesel tank and one 5,000 gallon previously abandoned diesel tank. In addition Mr. Tyseling reportedly was to complete and submit to ODEQ all the necessary permits and documents in a timely manner. Mr Tyseling was to provide if necessary proper treatment or disposal services for encountered impacted soil.

On June 16, 1994 a representative from ODEQ visited the site and noted that RSG had failed to acquire a solid waste Letter of Authorization from ODEQ, and was not properly managing the soil pile on-site. ODEQ issued a Notice of Non-compliance Letter dated June 24, 1994, informing RSG of two violations of the UDEQ's rules concerning the treatment of petroleum contaminated soils. In order to correct these violations, RSG was asked to perform the following:

- 1) Place contaminated soil on plastic, establish a berm around the soil and cover it to prevent problems associated with run-on and run-off.
- 2) Make plans to dispose of the soil at an approved landfill or processing facility and give notice to the Department in writing of when this will take place. This soil must be properly disposed of by no later than August 15, 1994. Disposal documents are due [back to the Department] by August 30, 1994.
- 3) Submit a report updating the Department on what soil treatment activity has occurred from the time of the soil excavation to the present.
- 4) It will be necessary to take soil samples for analysis from those areas where contaminated soil was stockpiled without the benefit of an effective liner. You must submit a plan outlining how this will be accomplished by July 11, 1994.

On June 30, 1994, AGRA on behalf of RSG Forest Products, submitted a report addressing the two violations issued by ODEQ for the Liberal Mill site located in Molalla, Oregon. This



RSG Forest Products, Liberal Mill Site  
Results of Closure Sampling  
Molalla, Oregon

21-06095-01  
August 12, 1994  
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letter outlined the four conditions that would be carried out by the August 30, 1994 deadline. ODEQ issued a response letter dated July 11, 1994 and provided additional clarification regarding the minimum number of soil samples to be collected from both the soil pile and the area where it was noted during their site visit that the liner had been damaged. The ODEQ also indicated that the soil samples were to be analyzed by ODEQ method TPH-D. And the results of those soil samples were to be forwarded to the Department by August 15, 1994.

### 3.0 STOCKPILED SOILS

On July 6, 1994, the stockpiled soil on site was leveled and rebuilt to a depth of approximately two feet, which allowed for the soils to aerate and allowed for the collection of closure samples. The soils were placed on visqueen and a three foot berm was constructed to prevent uncontrolled runoff.

### 4.0 CLOSURE SAMPLING

Closure samples were collected on July 27, 1994 from the soil pile and two areas where the visqueen liner had been damaged. Refer to Plate 2 for sample locations. Soil sampling procedures are included in Appendix A. Laboratory analytical reports and chain of custody documentation are included in Appendix B.

Previous HCID test results confirmed the presence of diesel. Low levels of diesel constituents were identified in 12 soil samples (CI-1 thru CI-10 and T-1 and T-2). Five of the 12 samples exceeded the most stringent ODEQ Soil Matrix Clean-up Level for diesel (i.e. 100 ppm). However, following our conversation on August 10, 1994 and our performing a Soil Clean-up Matrix Level evaluation for the site, no sample exceeded the ODEQ Soil Clean-up Matrix Level 2 for diesel (i.e. 500 ppm) calculated for this site.

Prior to our conversation and our Soil Clean-up Matrix Level evaluation, additional testing was conducted on five of the 12 samples. EPA Method 418.1 was used after a review of the chromatograph indicated that several of the samples could have been contaminated with organic wood debris, since organic wood debris is noted for its ability to give false hits for diesel constituents. Additional testing results concluded that four of the five samples did contain low levels of diesel. Sample T-2 results dropped significantly from 154 ppm to 53.0 ppm, which seemed indicative of organic material present in this sample.

A summary of diesel analytical data for samples collected on July 27, 1994 is presented below in Table 1.



RSG Forest Products, Liberal Mill Site  
Results of Closure Sampling  
Molalla, Oregon

21-06095-01  
August 12, 1994  
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TABLE 1  
SOIL ANALYTICAL DATA  
ODEQ Method TPH-D & 418.1  
All results are presented in ppm

| Location | Sample Date | Diesel (TPH-D) | Diesel (418.1) | Sample Depth |
|----------|-------------|----------------|----------------|--------------|
| CI-1     | 07/27/94    | 302            | 128            | 12" to 18"   |
| CI-2     | 07/27/94    | 88.4           | N.T.           | 18" to 24"   |
| CI-3     | 07/27/94    | 313            | 332            | 12" to 18"   |
| CI-4     | 07/27/94    | 200            | 205            | 12" to 18"   |
| CI-5     | 07/27/94    | 261            | 194            | 12" to 18"   |
| CI-6     | 07/27/94    | 92.2           | N.T.           | 12" to 18"   |
| CI-7     | 07/27/94    | 74.1           | N.T.           | 18" to 24"   |
| CI-8     | 07/27/94    | 32.5           | N.T.           | 18" to 24"   |
| CI-9     | 07/27/94    | 74.4           | N.T.           | 12" to 18"   |
| CI 10    | 07/27/94    | 47.9           | N.T.           | 12" to 18"   |
| T-1      | 07/27/94    | 86.7           | N.T.           | 0" to 3"     |
| T-2      | 07/27/94    | 151            | 53.0           | 0" to 3"     |

(Note: N.T. - Not Tested)

## 5.0 SOIL MATRIX CALCULATION

The ODEQ has established a Numeric Soil Clean-up Matrix (Oregon Administrative Rules (OAR) 340-122-301 to 340-122-360) for sites at which leaking underground storage tank systems have impacted the soils. In order to determine remediation target levels for petroleum contaminated soils, the matrix score for the site has been evaluated. The matrix score is determined by evaluation of five parameters provided in OAR 340-122-330 (1)-(5): (1) Depth to groundwater, (2) Mean annual precipitation, (3) Soil Type, (4) Sensitivity of the uppermost aquifer, and (5) Potential receptors. Based on data presented above, the site's matrix score would be as follows:

### 1) Depth to groundwater

The groundwater level at wells in the immediate vicinity of this site are between 5 and 10 feet below ground surface. Groundwater levels at less than 25 feet of depth score a "10."

### 2) Mean annual precipitation

Based on climatological data for the Molalla area (Average Portland Area Precipitation 1967 - 1982, Average Precipitation Map, BPA), the mean annual precipitation is 45 inches. This results in a score of "5."



RSG Forest Products, Liberal Mill Site  
Results of Closure Sampling  
Molalla, Oregon

21-06095-01  
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- 3) **Soil type**  
Based on the soil type of the soil pile, silts and sandy gravels, we assign a rating of "10."
- 4) **Sensitivity of the uppermost aquifer**  
Water well reports indicated that domestic water wells located in the immediate area are 45 feet or greater. The water table aquifer is not currently used for drinking water, however the quality is such that it could be used for drinking water. This results in a score of "4".
- 5) **Potential Receptors**
  - (a) Based on the distance to the nearest beneficial use well, and taking into account the regional and local groundwater migration direction and gradient, the distance descriptor would be considered "near."
  - (b) The number of people at risk, based on population of the area with two miles of the site which is served by drinking water wells would be deemed to be "medium."
  - (c) The combination of these two factors would give the site a score of "10."

The total score for the site would be 39, and Level 2 Numeric Soil Clean-up Standards would therefore apply. This would require site soils to be cleaned up to an 80 parts per million standard for gasoline contamination (as referenced to test method TPH-G) and 500 parts per million standard for diesel (as referenced to test method TPH-D or EPA 418.1).

## 6.0 CONCLUSIONS

The results of the July 27, 1994 sampling event are summarized below:

- 1) According to analytical method TPH-D, diesel constituents were identified in all 12 samples. Five of the 12 samples were above the most stringent ODEQ Numeric Soil Clean-up Matrix Level for diesel (i.e. 100 ppm) for this site.
- 2) Following our conversation on Wednesday, August 10, 1994 we performed a Soil Clean-up Matrix Level evaluation for the site. Based on that evaluation it appears that the site qualifies as a Level 2 site with a clean-up standard for diesel of 500 ppm. Since all closure soil samples reported concentrations of diesel well below Level 2 clean-up levels, AGRA on behalf of RSG is requesting site closure. Following your approval the soil will be spread out and used as a cover material within the log deck storage area. RSG will ensure that the treated soils will not come into contact with the groundwater table



RSG Forest Products, Liberal Mill Site  
Results of Closure Sampling  
Molalla, Oregon

21-06095-01  
August 12, 1994  
Page 5

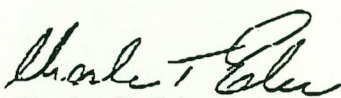
If you have questions or comments regarding this letter, please do not hesitate to contact the undersigned at (503) 639-3400.

Sincerely,

AGRA Earth and Environmental, Inc.

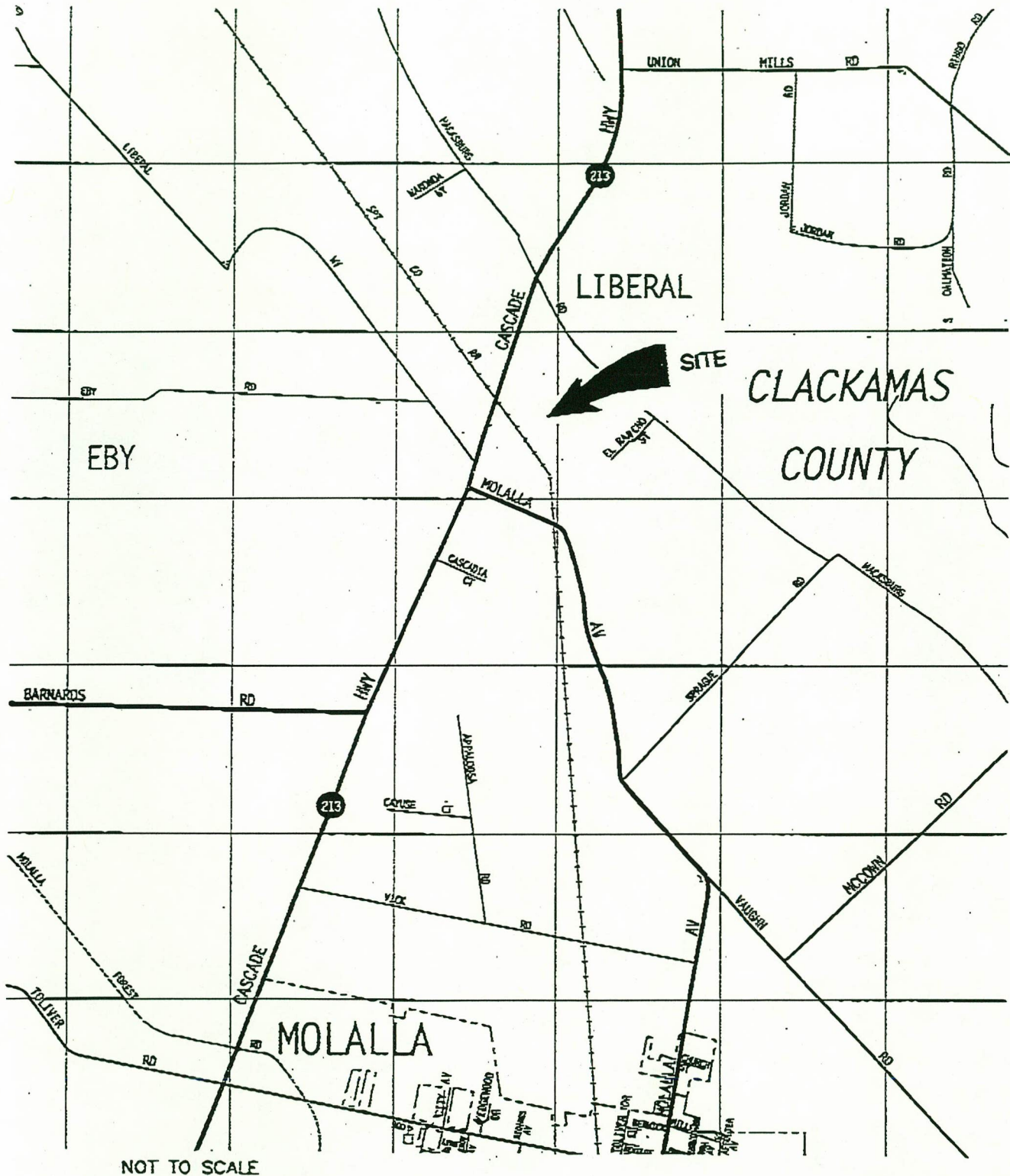


Denny Macomber  
Hazardous Waste Specialist



Charles T. Esler  
Senior Environmental Scientist





NOT TO SCALE

**PLATE 1**



**AGRA**  
*Earth & Environmental*

7477 SW Tech Center Drive  
Portland Oregon 97223-8025

|        |                    |
|--------|--------------------|
| W.O.   | <u>21-06095-01</u> |
| DESIGN | <u>DRM</u>         |
| DRAWN  | <u>MJF</u>         |
| DATE   | <u>AUG 1994</u>    |
| SCALE  | <u>N.T.S.</u>      |

**RSG FOREST PRODUCTS**  
28890 HIGHWAY 213  
MOLALLA, OREGON 97030

### SITE LOCATION MAP



## LEGEND

CL-10

T-2

CLOSURE SOIL SAMPLE NUMBER AND  
APPROXIMATE LOCATIONTEAR LOCATION SAMPLE NUMBER AND  
APPROXIMATE LOCATIONSTOCKPILE SAMPLE TEST RESULTS  
AUGUST 1994CONCENTRATIONS IN PARTS PER MILLION (PPM)  
NOT DETECTED, BELOW METHOD DETECTION LIMIT  
NOT TESTED418.1  
TPH-DTOTAL PETROLEUM HYDROCARBONS  
(BY EPA METHOD 418.1)TOTAL PETROLEUM HYDROCARBONS  
FOR DIESEL (BY EPA METHOD 8015)418.1  
TPH-DCONCENTRATIONS IN PPM  
COMPOUNDS

T-2

418.1  
TPH-D 63.0  
181

GRAVEL ROAD

T-1

418.1  
TPH-D NT  
66.7

CL-4

418.1  
TPH-D 296  
200

CL-5

418.1  
TPH-D 191  
261

CL-9

418.1  
TPH-D NT  
74.1

CL-1

418.1  
TPH-D 128  
302

CL-3

418.1  
TPH-D 332  
313

CL-6

418.1  
TPH-D NT  
82.2

CL-10

418.1  
TPH-D NT  
47.9

CL-2

418.1  
TPH-D NT  
88.4

CL-7

418.1  
TPH-D NT  
74.1

CL-8

418.1  
TPH-D NT  
32.8

LOG DECK AREA

0-3.5 FEET  
DEPTH AVERAGE: 2 FEET  
REA: 500 CUBIC YARDS0 10 20  
SCALE IN FEET**AGRA**  
Earth & Environmental7477 SW Tech Center Drive  
Portland, Oregon 97223-8025

W.O. 21-08095-01

DESIGN DRM

DRAWN MJF

DATE AUG 1994

SCALE 1"=10'

PLATE 2

RSG FOREST PRODUCTS  
28890 HIGHWAY 213  
MOLALLA, OREGON 97030

SOIL PILE SAMPLE LOCATIONS

AGRA EARTH &amp; ENVIRONMENTAL, INC. DRAWING NO. 21-08095-01/STX-0884.1/WS





NOTES:

1. DEPTHS
2. OVERAL
3. TOTAL ,



## **APPENDIX A**

### **Standard Operating Procedures**

#### **Soil Sampling**

## SOIL SAMPLING PROCEDURES

In situations where shallow soil sampling is required, and soils consist of silt and or sand, hand augering may be utilized. The hand auger apparatus consists of a stainless steel auger head, extension rod, and a handle manufactured by Art's Manufacturing & Supply, American Falls, Idaho. Extension rods are typically four or five feet long, and additional extension rods can be utilized to sample at depths of greater than five feet. The hand-auger is advanced by rotating the handle in a clockwise manner, and applying downward pressure. Hand-augering allows the continues logging of subsurface materials.

### Procedures

- o Hand-augering equipment (auger head, extension rod, and handle) will be decontaminated with a non-phosphatic detergent solution and deionized water rinse prior to initiating each boring, and prior to the collection of each sample.
- o The desired sampling depth will be achieved by advancing the hand-augered boring with a decontaminated hand auger. The hand-auger will then be decontaminated prior to sample collection. A representative portion of the soils within the sampler will be extracted from the auger head and transferred immediately to the appropriate sample containers with effort to avoid excessive disturbance and volatilization. Care is taken to prevent contact of the sample with the ground or any other surface which has not been decontaminated.
- o The sampling interval is determined by measuring the depth of the boring prior to sample collection and the depth of the boring following sample collection. The difference between these two numbers represents the length of the sampling interval.
- o After collecting the sample, the entire hand-auger apparatus will be decontaminated with a non-phosphatic detergent solution and deionized water rinse. The decontaminated hand-auger will be isolated in a clean area following each decontamination.
- o Samples will be transferred directly into the appropriate container. Containers will then be sealed, wiped clean, labeled, preserved according to analytical requirements, and have all Chain-of-Custody protocols completed.



## **APPENDIX B**

**Analytical Results**

**Chain-of-Custody**

**RZA AGRA, Inc.**

(Formerly: Rittenhouse-Zeman & Associates, Inc.)  
Engineering & Environmental Services

7477 SW Tech Center Drive  
Portland, Oregon 97223-8024  
(503) 639-3100  
FAX (503) 620-1892

August 12, 1994

AGRA Earth & Environmental, Inc.  
7477 SW Tech Center Drive  
Portland, OR 97223-8024

**Attention: Mr. Denny Macomber**

Dear Mr. Macomber:

RE: Analytical Results For Project 21-06095-01

Attached are the results for the samples submitted on July 28, 1994 from the above referenced project. For your reference, our project number associated with these samples is OR940408.

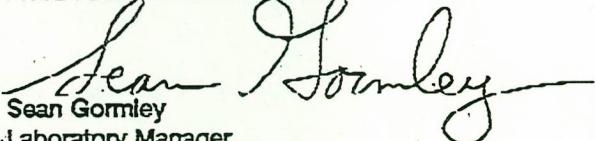
The samples were analyzed for diesel range petroleum hydrocarbons by ODEQ Method TPH D and total petroleum hydrocarbons by EPA Method 418.1 Modified at the AGRA Earth & Environmental Portland Chemistry Laboratory.

All analyses were conducted in accordance with applicable QA/QC guidelines. The results apply only to the samples submitted.

Please feel free to contact me if you have any questions regarding this report, or if I can be of any assistance in any other matter.

Respectfully submitted,

AGRA Earth & Environmental

  
Sean Gormley  
Laboratory Manager



**AGRA**  
Earth & Environmental Group



**RZA AGRA, Inc.**

(Formerly: Rittenhouse-Zeman & Associates, Inc.)  
Engineering & Environmental Services

7477 SW Tech Center Drive  
Portland, Oregon 97223-0024  
(503) 639-3100  
FAX (503) 620-1892

Project: RSG Molalla  
Project No.: 21-06095-01  
Project Manager: Denny Macomber  
Sample Matrix: Soil

Service Request No.: OR940408  
Report Date: 8/4/94  
Report No.: 94040802  
C.O.C No.: 1055/1061

**Total Petroleum Hydrocarbons - Diesel Range**  
**ODEQ Method TPH-D**  
(ppm)

| Sample Name  | Lab Code | Sample Date | Analysis Date | Method Detection Limit | Concentration | Surrogate Recovery 2-Fluorobiphenyl |
|--------------|----------|-------------|---------------|------------------------|---------------|-------------------------------------|
| CL-1-072794  | 408-1    | 7/27/94     | 8/2/94        | 25.0                   | 302           | 132                                 |
| CL-2-072794  | 408-2    | 7/27/94     | 8/2/94        | 25.0                   | 88.4          | 138                                 |
| CL-3-072794  | 408-3    | 7/27/94     | 8/2/94        | 25.0                   | 313           | 124                                 |
| CL-4-072794  | 408-4    | 7/27/94     | 8/3/94        | 25.0                   | 200           | 133                                 |
| CL-5-072794  | 408-5    | 7/27/94     | 8/3/94        | 25.0                   | 261           | *                                   |
| CL-6-072794  | 408-6    | 7/27/94     | 8/3/94        | 25.0                   | 92.2          | 140                                 |
| CL-7-072794  | 408-7    | 7/27/94     | 8/3/94        | 25.0                   | 74.1          | 138                                 |
| CL-8-072794  | 408-8    | 7/27/94     | 8/3/94        | 25.0                   | 32.5          | 142                                 |
| CL-9-072794  | 408-9    | 7/27/94     | 8/3/94        | 25.0                   | 74.4          | 133                                 |
| CL-10-072794 | 408-10   | 7/27/94     | 8/3/94        | 25.0                   | 47.9          | 136                                 |
| T1-072794    | 408-11   | 7/27/94     | 8/3/94        | 25.0                   | 86.7          | 131                                 |
| T2-072794    | 408-12   | 7/27/94     | 8/3/94        | 25.0                   | 154           | 145                                 |
| Lab Blank    | 408-MB   | 8/2/94      | 8/2/94        | 25.0                   | ND            | 139                                 |
| Lab Blank    | 408-MB   | 8/3/94      | 8/3/94        | 25.0                   | ND            | 143                                 |

Signature of Chemist

\* Surrogate recovery can not be reported due to target and non-target peaks within the retention time window of the surrogate.

Laboratory Manager

ND Not Detected

**AGRA**

Earth &amp; Environmental Group

**RZA AGRA, Inc.**

(Formerly: Rittenhouse-Zeman & Associates, Inc.)  
Engineering & Environmental Services

7477 SW Tech Center Drive  
Portland, Oregon 97223-8024  
(503) 639-3400  
FAX (503) 670-7897

Project: RSG Molalla  
Project No.: 21-06095-01  
Project Manager: Denny Macomber  
Sample Matrix: Soil

Service Request No.: OR940408  
Report Date: 8/10/94  
Report No.: 94040801  
C.O.C. No.: 1055/1061

**Total Petroleum Hydrocarbons by IR**  
**EPA Method 418.1**  
**mg/kg (ppm)**

| Sample Name | Lab Code | Sample Date | Date Extracted | Date Analyzed | Method Detection Limit | Result |
|-------------|----------|-------------|----------------|---------------|------------------------|--------|
| CL-1-072794 | 408-1    | 7/21/94     | 8/9/94         | 8/9/94        | 4.00                   | 128    |
| CL-3-072794 | 408-3    | 7/27/94     | 8/9/94         | 8/9/94        | 4.00                   | 332    |
| CL-4-072794 | 408-4    | 7/27/94     | 8/9/94         | 8/9/94        | 4.00                   | 205    |
| CL-5-072794 | 408-5    | 7/27/94     | 8/9/94         | 8/9/94        | 4.00                   | 194    |
| T2-072794   | 408-12   | 7/27/94     | 8/9/94         | 8/9/94        | 4.00                   | 53.0   |
| Lab Blank   | 400-MB   | 8/9/94      | 8/9/94         | 8/9/94        | 4.00                   | ND     |

ND Not Detected

Signature of Chemist

Laboratory Manager

**AGRA**

Earth &amp; Environmental Group



## Chain-of-Custody Record / Laboratory Analyses Request

08/12/94

14:46

6503 620 7892

RZA AGRA INC

DEQ NW REGION

007

| Job #                 |                                 | Analysis Requested: (Circle, Check Box, or Write Preferred Method in Box) |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 | Comments |  |
|-----------------------|---------------------------------|---------------------------------------------------------------------------|---------------------------------------|-------------------------|-------------------------|-------------------------|----------------------------------------|-----------------------|-------------------------------------------|-------------------|------------------------|------------------------------|--------------|--------------------|-----------------|----------|--|
| Job #                 |                                 | Halogenated Volatiles<br>EPA 801 EPA 802                                  | Volatile Aromatics<br>EPA 802 EPA 802 | BTXE or<br>BTXE / TPH-G | WA TPH-G or<br>OR TPH-G | WA TPH-D or<br>OR TPH-D | Fuel Scan / TPH by GC<br>8015-modified | GC Fingerprint / HCID | WA 418.1 Modified or<br>OR 418.1 Modified | GC / MS Volatiles | GC / MS Semi Volatiles | Total Metals<br>ICP AA Other | TC LP Metals | pH Cond. Alk Color | # of Containers | Comments |  |
| Job #                 | RSG Molalla                     |                                                                           |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| Job #                 | RSG                             |                                                                           |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| Job Manager:          | Danny Macomber Phone # 639-3400 |                                                                           |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| Operator's Name:      | Danny Macomber Phone # " "      |                                                                           |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| Operator's Signature: | Danny Macomber                  |                                                                           |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| Sample I.D. #         | Date                            | Time                                                                      | Preserv.                              | Matrix                  |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| CL-1-072794           | 7/29/94                         | 11:00                                                                     | ice                                   | Soil                    |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    | 2               |          |  |
| CL-2-072794           |                                 | 11:05                                                                     |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| CL-3-072794           |                                 | 11:15                                                                     |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| CL-4-072794           |                                 | 11:25                                                                     |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| CL-5-072794           |                                 | 11:35                                                                     |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| CL-6-072794           |                                 | 11:55                                                                     |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| CL-7-072794           |                                 | 12:05                                                                     |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| CL-8-072794           |                                 | 12:20                                                                     |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| CL-9-072794           |                                 | 12:35                                                                     |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |
| CL-10-072794          |                                 | 12:45                                                                     |                                       |                         |                         |                         |                                        |                       |                                           |                   |                        |                              |              |                    |                 |          |  |

|                      |                  |                  |                                |                          |
|----------------------|------------------|------------------|--------------------------------|--------------------------|
| Relinquished by RZA: | Relinquished by: | Relinquished by: | Laboratory:                    | Sample Receipt:          |
| Signature:           | Signature:       | Signature:       |                                |                          |
| Printed Name:        | Printed Name:    | Printed Name:    | Shipping I.D.#                 | Total # Containers:      |
| Firm:                | Firm:            | Firm:            | Carrier:                       | Condition of Containers: |
| Date/Time:           | Date/Time:       | Date/Time:       | DOT Designation:               | Condition of Seals:      |
| Received by:         | Received by:     | Received by:     | Special Instructions/Comments: |                          |
| Signature:           | Signature:       | Signature:       |                                |                          |
| Printed Name:        | Printed Name:    | Printed Name:    |                                |                          |
| Firm:                | Firm:            | Firm:            |                                |                          |
| Date/Time:           | Date/Time:       | Date/Time:       |                                |                          |

DISTRIBUTION: WHITE & PINK returned to project manager, YELLOW - lab.

Page of  
SERVICE REQUEST #: 08940106







August 17, 1994

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

NORTHWEST REGION

MARK REEVES  
RSG FOREST PRODUCTS  
PO BOX 169  
MOLALLA OR 97038

Re: RSG Forest Products  
File No. 03-92-138

Dear Mr. Reeves:

This letter is in response to information submitted to the Department by RZA/AGRA dated August 12, 1994, requesting Department approval on reuse of petroleum contaminated soil (PCS) at RSG Forest Products.

Up to 302 ppm of diesel was found to be present in soil samples analyzed by method TPH-D. No data was included in this report to support the assertion that wood waste interferences are responsible for the detection of diesel.

The Department outlined proper reuse of the soil on-site in a letter to RSG Forest Products dated July 11, 1994. In that letter it was stated that reuse of the soil on-site would be appropriate if analysis of soil samples could show that contamination remaining in the soil was within level one (1) matrix standards of 100 mg/kg for diesel; However, the Department is willing to consider placement of this soil on-site to within level II matrix standards for diesel (500 mg/kg) if a suitable location for soil placement can be found.

In the report provided by RZA/AGRA it was stated that your location scores out as a level II matrix site using DEQ's soil matrix evaluation. The matrix evaluation was developed to assist in the evaluation of PCS in relation to groundwater impacts, so in order to better evaluate this proposal the Department requires the following:

1. A written description of where the PCS will be reused. Site diagrams showing location must be included.
2. A written description of how the soil will be reused a way that will remain protective of human and animal health. The soil matrix evaluation does not take into consideration factors related to location and the possibility of direct contact.



2020 SW Fourth Avenue  
Suite 400  
Portland, OR 97201-4987  
(503) 229-5263 Voice/TDD  
DEQ-1

Mark Reeves  
August 17, 1994  
Page 2

3. A site inspection by Department staff to evaluate, photograph and document the proposed disposition site.

PCS must be reused according to the Department's policy for reuse of soil (copy enclosed). Submit a site map and letter to address the followup issues as requested above. Following that I will contact you to arrange for a site visit to your facility..

Your cooperation in complying with the Department's underground storage tank regulations is appreciated. If you have any questions or would like to discuss this matter you can reach me at 229-5496.

Sincerely,



Gregory Toran  
UST Cleanup Specialist  
Northwest Region

cc. Denny Macomber  
RZA AGRA, Inc.  
7477 SW Tech Center Drive  
Portland, Oregon 97223-8024



03-92-138

**RZA AGRA, Inc.**

(Formerly: Rittenhouse-Zeman & Associates, Inc.)  
Engineering & Environmental Services

7477 SW Tech Center Drive  
Portland, Oregon 97223-8024  
(503) 639-3400  
FAX (503) 620-7892

20 July 1994

21-06095-01

Mr. Gregory Toran  
Oregon Department of Environmental Quality  
Northwest Region  
2020 S.W. Fourth Avenue  
Portland, Oregon 97201-4987

Dear Mr. Toran:

RE: NOTICE OF NON-COMPLIANCE  
RSG FOREST PRODUCTS, LIBERAL LUMBER COMPANY  
28890 HIGHWAY 213  
MOLALLA, OREGON 97030

In response to our conversation on July 18, 1994 and your letter dated July 11, 1994 concerning the correction of violations as described in the Notice of Non-compliance that was issued to RSG Forest Products on June 24, 1994, RZA AGRA, Inc (AGRA), on behalf of RSG Forest Products (RSG), is providing the enclosed letter to address the two issues not previously outlined in our letter dated June 30, 1994. This letter is submitted as per your request and serves as an acknowledgement of RSG's compliance with the two items mentioned in detail in your letter.

RSG fully intends to comply with the recommendations of your office and perform the following two tasks in accordance with your letter dated July 11, 1994:

- 1) RZA AGRA, Inc has agreed to collect closure samples at a rate of one sample per 50 cubic yards from the rebuilt soil pile. The analytical test method to be used for all samples collected will be ODEQ Method TPH-D. Copies of those sample results will be forwarded to your office prior to August 15, 1994 as per your request. If the closure sample results confirm that the soil has been cleaned up to appropriate ODEQ cleanup standards for diesel contaminated soils (100 ppm), RSG intends to use the soil on-site, following ODEQ approval. The soil would be spread out and used as a cover material within the log deck storage area. RSG would ensure that treated soils would not come into contact with the groundwater table.

**AGRA**

Earth &amp; Environmental Group



Oregon Department of Environmental Quality  
19 July 1994

21-06095-01  
Page 2

- 2) RSG has indicated that the soil pile was stored on visqueen and no contaminated soil came into contact with clean dirt. It is possible that a small portion of the liner did receive minor damage during one of the soil tilling events. RSG agrees to collect soil samples in those areas where the visqueen may have been damaged. Samples will be collected one per every 250 square foot wherever there are visible tears in the liner. Collected soil samples will be analyzed for diesel by ODEQ method TPH-D.

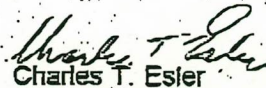
I hope this information has been helpful. If you have questions or comments regarding this letter, please do not hesitate to contact the undersigned at (503) 639-3400.

Sincerely,

RZA AGRA, Inc



Denny Macomber  
Hazardous Waste Specialist



Charles T. Esler  
Senior Environmental Scientist

c Mark Reeves, RSG Forest Products



AGRA

Earth & Environmental Group



03-92-138

# RZA AGRA, Inc.

(Formerly: Rittenhouse-Zeman & Associates, Inc.)  
Engineering & Environmental Services

7477 SW Tech Center Drive  
Portland, Oregon 97223-8024  
(503) 639-3400  
FAX (503) 620-7892

20 July 1994  
21-06095-01

DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED

JUL 25 1994

NORTHWEST REGION

Mr. Gregory Toran  
Oregon Department of Environmental Quality  
Northwest Region  
2020 S.W. Fourth Avenue  
Portland, Oregon 97201-4987

Dear Mr. Toran:

RE: NOTICE OF NON-COMPLIANCE  
RSG FOREST PRODUCTS, LIBERAL LUMBER COMPANY  
28890 HIGHWAY 213  
MOLALLA, OREGON 97030

In response to our conversation on July 18, 1994 and your letter dated July 11, 1994 concerning the correction of violations as described in the Notice of Non-compliance that was issued to RSG Forest Products on June 24, 1994, RZA AGRA, Inc (AGRA), on behalf of RSG Forest Products (RSG), is providing the enclosed letter to address the two issues not previously outlined in our letter dated June 30, 1994. This letter is submitted as per your request and serves as an acknowledgement of RSG's compliance with the two items mentioned in detail in your letter.

RSG fully intends to comply with the recommendations of your office and perform the following two tasks in accordance with your letter dated July 11, 1994:

- 1) RZA AGRA, Inc has agreed to collect closure samples at a rate of one sample per 50 cubic yards from the rebuilt soil pile. The analytical test method to be used for all samples collected will be ODEQ Method TPH-D. Copies of those sample results will be forwarded to your office prior to August 15, 1994 as per your request. If the closure sample results confirm that the soil has been cleaned up to appropriate ODEQ cleanup standards for diesel contaminated soils (100 ppm), RSG intends to use the soil on-site, following ODEQ approval. The soil would be spread out and used as a cover material within the log deck storage area. RSG would ensure that treated soils would not come into contact with the groundwater table.



**AGRA**

Earth & Environmental Group

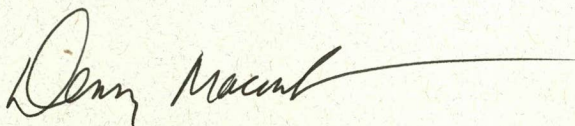


- 2) RSG has indicated that the soil pile was stored on visqueen and no contaminated soil came into contact with clean dirt. It is possible that a small portion of the liner did receive minor damage during one of the soil tilling events. RSG agrees to collect soil samples in those areas where the visqueen may have been damaged. Samples will be collected one per every 250 square feet wherever there are visible tears in the liner. Collected soil samples will be analyzed for diesel by ODEQ method TPH-D.

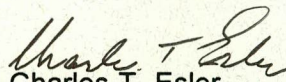
I hope this information has been helpful. If you have questions or comments regarding this letter, please do not hesitate to contact the undersigned at (503) 639-3400.

Sincerely,

**RZA AGRA, Inc**



Denny Macomber  
Hazardous Waste Specialist



Charles T. Esler  
Senior Environmental Scientist

c Mark Reeves, RSG Forest Products



**AGRA**

Earth & Environmental Group



## UST CLEANUP TELEPHONE USE REPORT

CALL FROM/TO: Denny Macomber DATE: July 18 94

WITH: \_\_\_\_\_ TIME: \_\_\_\_\_

TELEPHONE NO: ( ) \_\_\_\_\_

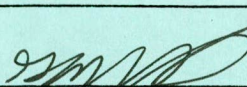
REGARDING: PCS Follow up @ RSG

FILE NO: 03 - 92 - 138

### SUMMARY OF CALL

Additional sampling is being done at  
the rate of one per SD.

will do additional sampling under  
treatment Area. All conditions listed  
in Nov will be met by target  
date. Denny will followup with letter  
to outline these items by 21 July 94.

  
\_\_\_\_\_  
Staff Signature



July 11, 1994

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

MARK REEVES  
RSG FOREST PRODUCTS  
PO BOX 169  
MOLALLA OR 97038

NORTHWEST REGION

Re: RSG Forest Products  
File No. 03-92-138

Dear Mr. Reeves:

This letter is in response to a letter to the Department dated June 30, 1994, from RZA AGRA, Inc. concerning the correction of violations as described in the Notice of Noncompliance that was issued to RSG Forest Products.

In the Notice of Noncompliance issued by the Department, four conditions were to be met by July 11, 1994, these conditions were:

- 1) Place the contaminated soil on plastic, establish a berm around the soil and cover it to prevent problems associated with run-on and run-off.
- 2) Make plans to dispose of the soil at an approved landfill or processing facility and give notice to the Department in writing of when this will take place. This soil must be properly disposed of by no later than August 15, 1994. Disposal documents are due in this office by August 30, 1994.
- 3) Submit a report updating the Department on what soil treatment activity has occurred from the time of the soil excavation to the present.
- 4) It will be necessary to take soil samples for analysis from those areas where contaminated soil was stockpiled without the benefit of an effective liner. You must submit a plan outlining how this will be accomplished.

The letter from RZA contains little information that would cause the Department to modify it's position concerning the methods for correction of the violations. The following two conditions have not been satisfied.



2020 SW Fourth Avenue  
Suite 400  
Portland, OR 97201-4987  
(503) 229-5263 Voice/TDD  
DEQ-1



Mark Reeves  
July 11, 1994  
Page 2

This soil must be disposed of by August 15, 1994 and all final documentation concerning disposal of this soil is due August 30, 1994. The Department would consider proper reuse of the soil on-site to be an appropriate method of disposal. However, it must be demonstrated that this soil is within the cleanup levels for diesel contaminated soil (100 ppm) and additional analysis if the soil at the rate of one sample per 50 cubic yards is required. In addition, The analytical test method to be used must be TPH-D and not HCID as outlined by RZA. The results of soil analysis and the chain of custody documents must be reviewed by Department staff and approval given for reuse of the soil prior to any movement of soil. The date for disposal of the soil off-site an approved processing facility or reuse (spreading and covering) of the soil on-site continues to be August 15, 1994.

In answer to the request for a waiver on the soil sampling of those areas where contaminated soil was stockpiled without the benefit of a liner, the Department still believes that it is appropriate to sample from these areas. Although these soils may have been stored on visqueen at one time, it is apparent that sometime during the treatment period this liner has been damaged. This was documented during the Department's inspection of the soil pile on June 16, 1994. Sampling under the soil is required when there is evidence to show that a liner is damaged or does not exist. The appropriate number of samples to be taken in this case are one per every 250 square feet of treatment area or wherever there is a tear in the liner.

Please respond by July 18, 1994, in writing and outline exactly how you intend to resolve the remaining issues as described above.

Your cooperation in complying with the Department's underground storage tank regulations is appreciated. If you have any questions or would like to discuss this matter you can reach me at 229-5496.

Sincerely,



Gregory Toran  
UST Cleanup Specialist  
Northwest Region

enclosure

cc. Denny Macomber  
RZA AGRA, Inc.  
7477 SW Tech Center Drive  
Portland, Oregon 97223-8024



# RZA AGRA, Inc.

(Formerly: Rittenhouse-Zeman & Associates, Inc.)  
Engineering & Environmental Services

7477 SW Tech Center Drive  
Portland, Oregon 97223-8024  
(503) 639-3400  
FAX (503) 620-7892

30 June 1994  
21-06095-01

Mr. Gregory Toran  
Oregon Department of Environmental Quality  
Northwest Region  
2020 S.W. Fourth Avenue  
Portland, Oregon 97201-4987

DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED  
JUL 06 1994  
NORTHWEST REGION

Dear Mr. Toran:

RE: NOTICE OF NON-COMPLIANCE  
RSG FOREST PRODUCTS, LIBERAL LUMBER COMPANY  
28890 HIGHWAY 213  
MOLALLA, OREGON 97030

In response to your recent site visit on June 16, 1994 and your letter of Non-compliance dated June 24, 1994, RZA AGRA, Inc (AGRA), on behalf of RSG Forest Products (RSG), is providing the enclosed letter to address the two violations issued by The Oregon Department of Environmental Quality (ODEQ) for the Liberal Mill site located in Molalla, Oregon. This letter is submitted as per your request and serves as an acknowledgement of RSG's compliance with the four items mentioned in detail in your letter.

## 1.0 BACKGROUND

On February 17, 1992, Jeff Tyseling Enterprises was contracted to provide decommissioning services for RSG at the Liberal Mill site. Services were to include removing two Underground Storage Tanks (UST's) on-site, one 10,000 gallon diesel tank and one 5,000 gallon previously abandoned diesel tank. In addition Mr. Tyseling reportedly was to complete and submit to ODEQ all the necessary permits and documents in a timely manner. Mr. Tyseling was to provide if necessary proper treatment or disposal services for encountered impacted soil. According to recent conversations with Mr. Mark Reeves at RSG, he was not aware that Mr. Tyseling had failed to obtain a permit as per their agreement. RSG is now aware that Mr. Tyseling apparently failed to: 1) acquire a solid waste Letter of Authorization from ODEQ, and 2) properly manage the soil pile on-site. However, Mr. Reeves, has indicated that the soils were stockpiled on visqueen since the time of excavation and that no contaminated soils were in contact with underlying clean soil. A small portion of the visqueen reportedly tore off during the most recent pile aeration event and that portion of the visqueen was placed on top of the pile, and perhaps this is what was noted by your staff during their inspection.

RSG fully intends to comply with the recommendations of your office and perform the following four tasks in accordance with your letter dated June 24, 1994:



**AGRA**

Earth & Environmental Group

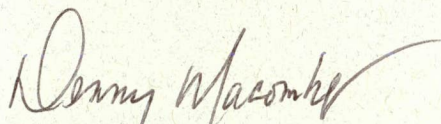


- 1) By July 11, 1994, the stockpiled soil on site will be leveled and rebuilt to a depth of approximately two feet, which will allow the soils to aerate and allow for the collection of closure samples. The soils will be placed on and covered with visqueen. Adequate berms to prevent uncontrolled runoff will also be constructed.
- 2) RZA AGRA, Inc has agreed to collect closure samples from the rebuilt soil pile. Copies of those sample results will be forwarded to your office prior to August 30, 1994. Previous sample results indicated that only one area of the pile tested positive for diesel contamination (S3 at approximately 60.5 ppm). If the closure sample results confirm that the soil has been cleaned up to appropriate ODEQ cleanup standards, RSG would like to use the soil on-site. The soil would be spread out and used as a cover material within the log deck storage area. RSG would ensure that treated soils would not come into contact with the groundwater table.
- 3) According to Mark Reeves, since the original UST decommission took place on site, the stockpiled soils have been leveled, stirred, rebuilt once, and sampled. RZA collected six representative soil samples on November 11, 1993 and submitted to RZA's in-house laboratory located in Portland, Oregon. The samples were analyzed by ODEQ Method TPH-HCID. HCID results indicated that five of the six samples tested negative. Sample S3, collected from the NW corner, tested positive for Diesel contamination. Based on the HCID results, RZA's analytical chemist estimates 60.5 ppm diesel was present in sample S3. Sample S3 did not exceed the 100 ppm soil matrix cleanup level for a level 1 site. The analytical results have been included with this report.
- 4) RSG has indicated that the soil pile was stored on visqueen and no contaminated soil came into contact with clean dirt. In addition, RSG feels that since recent analytical results have indicated that the soils appear to not exceed the 100 ppm cleanup level, that the request for additional sampling is unwarranted.

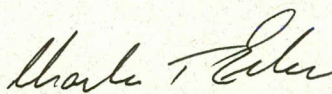
I hope this information has been helpful. If you have questions or comments regarding this letter, please do not hesitate to contact the undersigned at (503) 639-3400.

Sincerely,

**RZA AGRA, Inc**



Denny Macomber  
Hazardous Waste Specialist



Charles T. Esler  
Senior Environmental Scientist

Enclosures

c Mark Reeves, RSG Forest Products



**AGRA**

Earth & Environmental Group



# RZA AGRA, Inc.

(Formerly: Rittenhouse-Zeman & Associates, Inc.)  
Engineering & Environmental Services

7477 SW Tech Center Drive  
Portland, Oregon 97223-8024  
(503) 639-3400  
FAX (503) 620-7892

June 28, 1994

RZA AGRA, Inc.  
7477 SW Tech Center Drive  
Portland, OR 97223-8024

**Attention: Mr. Denny Macomber**

Dear Mr. Macomber:

RE: Diesel Concentration For Sample S-3, Project No. 21-06095-03

Pursuant to your request, I have reviewed the data files for the samples submitted on November 10, 1993 from the above referenced project. For your reference, our project number associated with these samples is OR930232.

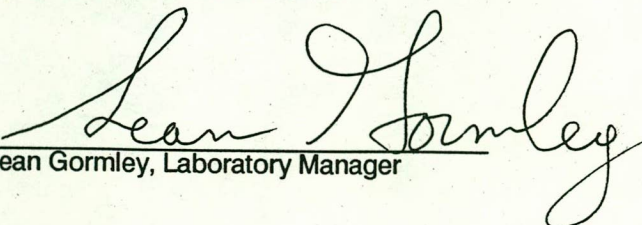
The samples were analyzed for petroleum hydrocarbons by ODEQ Method TPH-HCID, and sample S-3 did have a positive hit for diesel.

The instrument used to analyze the samples was fully calibrated for diesel, and all associated diesel related QA/QC was acceptable, so the file was reprocessed to obtain the diesel concentration, which was 60.5 mg/kg(ppm).

Please feel free to contact me if you have any additional questions regarding this report, or if I can be of assistance in any other matter.

Respectfully submitted,

**AGRA Earth & Environmental**

  
Sean Gormley, Laboratory Manager



**AGRA**

Earth & Environmental Group



# RZA AGRA, Inc.

(Formerly: Rittenhouse-Zeman & Associates, Inc.)  
Engineering & Environmental Services

7477 SW Tech Center Drive  
Portland, Oregon 97223-8024  
(503) 639-3400  
FAX (503) 620-7892

Client: RSG Forest Products  
Project No.: 6095-03  
Project Manager: Denny Macomber  
Sample Matrix: Soil

Service Request No.: OR930232  
Report Date: 11/15/93  
Report No.: 5134  
C.O.C. No.: 151

## Hydrocarbon Identification Scan ODEQ Method TPH-HCID mg/kg(ppm)

| Sample Name:              | S1     | S2     | S3          | S4     | S5     | S6     | LAB BLANK | Detection |
|---------------------------|--------|--------|-------------|--------|--------|--------|-----------|-----------|
| Lab Code:                 | 0232-1 | 0232-2 | 0232-3      | 0232-4 | 0232-5 | 0232-6 | 11-10 SBK | Limit     |
| (C4-C10)                  |        |        |             |        |        |        |           |           |
| Gasoline Range            | ND     | ND     | ND          | ND     | ND     | ND     | ND        | 10.0      |
| (C11-C24)                 |        |        |             |        |        |        |           |           |
| Diesel Range              | ND     | ND     | Positive ID | ND     | ND     | ND**   | ND        | 50.0      |
| (C25-C35)                 |        |        |             |        |        |        |           |           |
| Heavy Oil Range           | ND     | ND     | ND          | ND     | ND     | ND     | ND        | 200       |
| Sample Date:              | 11/4   | 11/4   | 11/4        | 11/4   | 11/4   | 11/4   | -         |           |
| Analysis Date:            | 11/10  | 11/10  | 11/10       | 11/10  | 11/10  | 11/10  | 11/10     |           |
| Surrogate Recovery:       |        |        |             |        |        |        |           | Control   |
|                           |        |        |             |        |        |        |           | Limits    |
| 2-Fluorobiphenyl:         | 116    | 117    | *           | 98.6   | 109    | *      | 116       | 50%-150%  |
| a,a,a - Trifluorotoluene: | 110    | 104    | 108         | 105    | 111    | 114    | 103       | 50%-150%  |

ND Not Detected

\* Surrogate recovery cannot be reported due to target and non-target peaks within the retention time window of the surrogate.

\*\*Peaks were detected within the retention time window of the petroleum product, however, the petroleum product concentration was below the method detection limit.

Signature of Chemist

Laboratory Manager



AGRA  
Earth & Environmental Group



June 24, 1994

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

NORTHWEST REGION

MARK REEVES  
RSG FOREST PRODUCTS  
PO BOX 169  
MOLALLA OR 97038

Re: RSG Forest Products  
File No. 03-92-138  
NWR-UST-94-044  
NOTICE OF NONCOMPLIANCE

Dear Mr. Reeves:

The purpose of this letter is to inform you of violations of the Department of Environmental Quality's rules concerning the treatment of petroleum contaminated soil (PCS) at RSG Forest Products, located at 28890 Highway 213 in Molalla, Oregon. This violation was documented during a site inspection by Department staff on June 16, 1994. Contaminated soil from this cleanup project has been stockpiled on-site for over two years with very little active treatment.

Violation 1.

Failure to obtain a permit before operating a solid waste treatment or disposal site in accordance with Oregon Administrative Rule (OAR) 340-93-050. Contaminated soil from the decommissioning of an underground storage tank is being stored on site without a Solid Waste Letter of Authorization from the Department.

Violation 2.

Failure to remedy hazards posed by contaminated soil in accordance with (OAR) 340-122-225 (1)(d). Soil is not being responsibly managed, it is not on plastic or contained within a berm. Contaminated soil is currently in contact with native soil without the use of an undamaged barrier to prevent the migration of contamination.

These violations are Class II violations and are considered to be significant violations of Oregon environmental law.



2020 SW Fourth Avenue  
Suite 400  
Portland, OR 97201-4987  
(503) 229-5263 Voice/TDD  
DEQ-1



Mark Reeves  
June 24, 1994  
Page 2

Should you fail to correct the violations in accordance with the schedule set forth below or should a similar violation occur, we will refer your file to the Department's Enforcement Section with a recommendation to proceed with a formal enforcement action which may result in a civil penalty assessment.

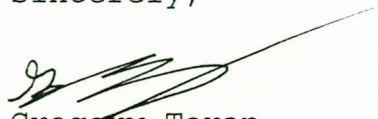
In order to correct these violations, you must perform the following by **July 11, 1994**:

- 1) Place the contaminated soil on plastic, establish a berm around the soil and cover it to prevent problems associated with run-on and run-off.
- 2) Make plans to dispose of the soil at an approved landfill or processing facility and give notice to the Department in writing of when this will take place. This soil must be properly disposed of by no later than August 15, 1994. Disposal documents are due in this office by August 30, 1994.
- 3) Submit a report updating the Department on what soil treatment activity has occurred from the time of the soil excavation to the present.
- 4) It will be necessary to take soil samples for analysis from those areas where contaminated soil was stockpiled without the benefit of an effective liner. You must submit a plan outlining how this will be accomplished.

Please submit a report by July 11, 1994, acknowledging your compliance with the four items as detailed above.

Your cooperation in complying with the Department's underground storage tank regulations is appreciated. If you have any questions or would like to discuss this matter you can reach me at 229-5496.

Sincerely,

  
Gregory Toran  
UST Cleanup Specialist  
Northwest Region

cc: Al Kiphut WMC  
Enforcement Section, RO



# SOIL AERATION FIELD INSPECTION REPORT

Site Name: RSG Forest Products

Date: 6-16-94

Site Address: 28890 Hwy 213, P.O. Box 169, Molalla, OR 97038 File No.: 4525/03-92-138

Inspected By: R. Rose

Inspection Time: 1100 / 1235 + Travel: 1 = 2.5 Total Time  
arrive depart (total rounded to nearest .5 hours)

PHOTOS TAKEN? ☒ / N (attach)

SAMPLES COLLECTED? Y / ☒ (attach)

☒ N Is there any soil onsite? If yes, ESTIMATED VOLUME OF SOIL: \_\_\_\_\_ yd<sup>3</sup>

Y ☒ Is any soil being treated offsite? If yes, list the treatment site address: \_\_\_\_\_

THE FOLLOWING ARE PROBLEMS THAT WERE OBSERVED: (circle appropriate descriptor)

\_\_\_ There is no fence or other security measures in place to prevent unauthorized access to the contaminated soil OR barriers are damaged or have fallen.

☒ Soil is being stockpiled with no active treatment evident.

☒ No liner or liner is damaged.

☒ Not contained in a bermed area or berm is inadequate or damaged.

☒ No cover or cover not secured.

☒ Treated soil is not being responsibly managed.

☒ No liner or liner is damaged or excessively torn.

☒ Not contained in a bermed area or berm is inadequate or damaged.

☒ No evidence that soil is covered during rain or storms.

☒ No evidence that soil is tilled/turned on a regular basis.

☒ Soil is spread thicker than 12-18 inches. Actual depth: \_\_\_\_\_

\_\_\_ Visible evidence that surface water runoff has occurred or is likely to occur.

\_\_\_ Treatment site is not suitable.

\_\_\_ Located near (<100 feet) a wetland area or surface stream.

\_\_\_ Treatment area is on a steep embankment.

\_\_\_ Located within a residential area and the Department has received complaints and/or observed nuisance conditions of dust or odors.

IN COMPLIANCE? Y / ☒ / NA

If soil observed, complete the following:

Y N An UST Permit Addendum or LOA has been issued. Expires: \_\_\_\_\_

Y N A Soil Treatment Plan has been received. Date Received: \_\_\_\_\_

NOTES: RSG  
Contacts: Facility mgr.: Mark Reese 829-7200, Region Mgr.: RSG

Scott Meek (206) 873-2825; RZA: Soil proj. mgr. (Chuck Easter)  
639-3400. over

↑  
N

SITE SKETCH

NOTES

Observed large soil heap 120x30x12, football size boulders mixed with soil. Plastic cover off, piled to side, old former plastic liner torn (destroyed).

Mr. Meeks indicated the heap will be spread out. I Advised contact between Dept, RZA & RSG, possible NON.











6-12-94

RSG Forest Products

03-92-139

16 June 1994



TELEPHONE USE REPORTCALL FROM/TO: Jerry KoschalDATE: 3 Nov 93COMPANY/TITLE: RZATIME: 0905PHONE NO.: 639-3400 <sup>ex</sup> (307)

(Circle for filing)

CITY: \_\_\_\_\_ COUNTY: \_\_\_\_\_

AQ Asbestos

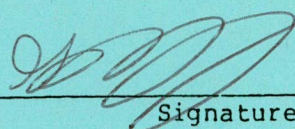
WQ OSS

SW HW

General Spill

LostSUMMARY OF CALL:

Jerry has been contacted recently by RSG in response to my letter of Oct 20, 1993. Jerry wanted to know release date, Contractor name and amount of soil per last inspection. Informed Jerry that we have received no reports or updates of treatment. He said he would check into outcome of soil and get back to me. Jerry asked if biotreatment was an option, I told him that disposal at a Processing facility is more of what I had in mind since little seems to have been done with this soil project.

  
Signature



October 20, 1993

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

NORTHWEST REGION

MARK REEVES  
RSG FOREST PRODUCTS  
PO BOX 169  
MOLALLA OR 97038

Re: RSG FOREST PRODUCTS  
File No. 03-92-138

Dear Mr. Reeves:

The purpose of this letter is to inquire about the status of your soil remediation project. Has any additional petroleum contaminated soil been discovered, or is any soil from this site being treated or stockpiled at another location? This inquiry only applies to soil being treated above ground and does not include soil being treated in situ.

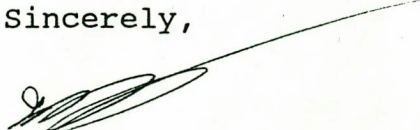
If your soil remediation project is completed, please submit analytical test results and chain of custody documents to show that treatment levels have been reached. Also, include a written narrative to describe the history of this project and treatment methods used to achieve cleanup levels. Lastly, complete and return the enclosed final soil disposition form. Please return these to me by October 29, 1993.

If your contaminated soil was disposed of at a processing facility, submit all receipts and shipping manifests.

If you are currently treating or storing petroleum contaminated soil, contact me by October 29, 1993, to clarify these issues. Your unwillingness to address these concerns may be followed by formal enforcement action.

If you need any assistance, feel free to contact me at 229-6385 ext. 266.

Sincerely,

  
Gregory E. Toran  
UST Cleanup Specialist

enclosure



1500 SW First Avenue  
Suite 750  
Portland, OR 97201-5884  
(503) 229-5263  
DEQ-1



File

\_\_\_\_\_ Install/Retro  
 \_\_\_\_\_ Decommission  
 \_\_\_\_\_ UST Facility  
 \_\_\_\_\_ Distrib. Audit  
 \_\_\_\_\_ Cleanup  
 \_\_\_\_\_ Soil Aeration  
 \_\_\_\_\_ Complaint  
 \_\_\_\_\_ Excav. Closure  
 \_\_\_\_\_ FAP Application  
 \_\_\_\_\_  
 \_\_\_\_\_ (other) \_\_\_\_\_  
 FAP Site? Y / N

(other)  
FAP Site? Y / N

Mark Reeves supervised removal. Jeff Keisling of Keisling Construction did removal. Tank was removed.  $\approx$  6 weeks ago. Water in pit but no sheen. Small area ( $\approx 6 \times 6'$ ) of stained soil near point C on sketches - this may be superficial



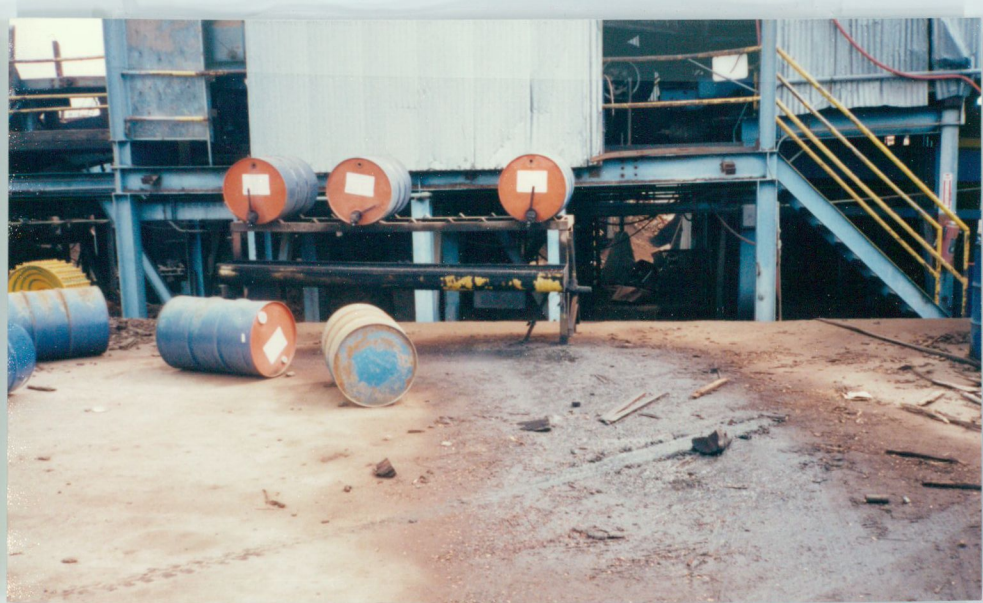
INSPECTION NOTES: (cont.)

Soil is stockpiled ~~sand~~ around perimeter <sup>of excavation</sup>. no obvious staining or odors in stockpiled soil. A second tank is visible in the soil. Mark said this tank was filled with sand. I said I didn't think that our rules would affect the second tank depending on when it was decommissioned, however it might be in the way of future cleanup.

Also on site, I ~~observed~~ observed several other areas of heavily stained soil. Documenting repeated small spills. There was also a punctured 55 gal drum which was labeled as antipeeze. The contents had spilled from the drum onto the ground. There was no apparent effort to clean up the spillist material.























## RSG Forest Products

The excavation  
with "oil".  
stained soils

water in the  
excavation -  
may be surface  
water



KSC Forest Products

stained soles

damaged oil drums

"No" How

stained soles

water in the

excavation -

may be surface

water

↪ Sheen on puddle.

Damaged  
antifreeze drum.

# SOIL AERATION FIELD INSPECTION REPORT

Site Name: RS G Forest Products

Date: 18 May 93

Site Address: 28890 S. Hwy 213 Molalla

File No.: 03-92-138

Inspected By: TRG

Inspection Time:  $\frac{1313}{\text{arrive}}$  /  $\frac{1343}{\text{depart}}$  + Travel:  $\frac{63}{113}$  =  $\frac{1.0}{\text{(total rounded to nearest .5 hours)}}$  Total Time

PHOTOS TAKEN? (Y) / N (attach)

SAMPLES COLLECTED? Y / (N) (attach)

(Y) N Is there any soil onsite? If yes, ESTIMATED VOLUME OF SOIL: 800 yd<sup>3</sup>

Y ☒ N Is any soil being treated offsite? If yes, list the treatment site address:

THE FOLLOWING ARE PROBLEMS THAT WERE OBSERVED: (circle appropriate descriptor)

There is no fence or other security measures in place to prevent unauthorized access to the contaminated soil OR barriers are damaged or have fallen.

✓ Soil is being stockpiled with no active treatment evident.

No liner or liner is damaged.

Not contained in a bermed area or berm is inadequate or damaged.

✓ No cover or cover not secured.

Treated soil is not being responsibly managed.

No liner or liner is damaged or excessively torn.

Not contained in a bermed area or berm is inadequate or damaged.

No evidence that soil is covered during rain or storms.

— No evidence that soil is tilled/turned on a regular basis.

Soil is spread thicker than .12-18 inches. Actual depth:

Visible evidence that surface water runoff has occurred or is likely to occur.

Treatment site is not suitable.

Located near (<100 feet) a wetland area or surface stream.

Treatment area is on a steep embankment.

Located within a residential area and the Department has received complaints and/or observed nuisance conditions of dust or odors.

IN COMPLIANCE? Y / N / NA

If soil observed, complete the following:

Y N An UST Permit Addendum or LOA has been issued. ? Expires: \_\_\_\_\_

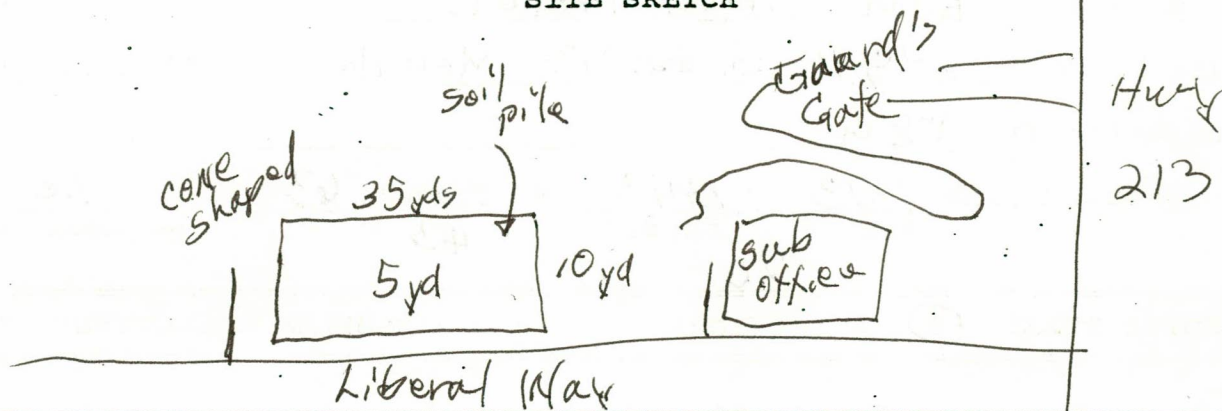
Y N A Soil Treatment Plan has been received. Date Received: \_\_\_\_\_

NOTES: service provider - Tisling enterprises



†  
N

SITE SKETCH



NOTES

Handwritten notes area with multiple horizontal lines for recording observations.

Date: June 30, 1993

DEQ FILE NO: 03-92-138

Site Name: RSG Forest Products

Site Address: 28890 Hwy 213  
Malilla, Oregon 97038

Responsible Party: Mark Reeves

Company: RSG Forest Products

Mailing Address: PO Box 169  
Malilla, OR 97038

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

NORTHWEST REGION

On May 18, 1993, the Department conducted an inspection of your soil treatment project located at the above site address. During the inspection, the following items were noted that need to be corrected:

- ☐ Soil is being stockpiled with no active treatment evident.
- ☐ There is no fence or security measures in place to prevent unauthorized access to the contaminated soil.
- ☐ No liner or the liner is excessively torn.
- ☐ Not contained in a bermed area or berm is inadequate or damaged.
- ☒ No evidence that the soil is covered during rain or storms.
- ☐ No evidence that soil is tilled/turned on a regular basis.
- ☐ Treatment site is unsuitable.
- ☒ Visible evidence that surface water runoff has occurred or is likely to occur. THIS MUST BE CORRECTED IMMEDIATELY.

In addition, a review of your file indicates the following:

- ☐ Application to treat petroleum contaminated soil (PCS) has not been submitted.
- ☐ The UST Permit Addendum to treat petroleum contaminated soil has expired.

Failure to properly manage petroleum contaminated soil is a serious problem. If you do not correct the above listed discrepancies, you will be considered to be in violation of OAR 340-122-225(1)(d) and enforcement action will be initiated as appropriate to ensure that compliance is achieved.





By July 23<sup>rd</sup>, 1993, submit a written statement that describes the actions taken to address the above items and the date these actions were completed. In addition, complete and return the enclosed forms to this office.

An UST Permit Addendum expiration date of September 10, 1993, has been assigned to this site. If treatment of the soil is not completed by this date, it will have to be taken to a permitted facility or landfill for treatment or disposal. If treatment is complete, please submit copies of analytical data, chain-of-custody records, documentation of the final soil disposition, and a report that describes all actions taken during treatment project duration.

Copies of all pertinent forms and guidance documents have been enclosed.

If you have questions about your soil treatment or UST cleanup project, please contact the Northwest Region UST Duty Officer at (503) 229-5263.

cc:

**MATRIX CLEANUP EXCAVATION CLOSURE APPROVAL**

Site Information

Site Name: RSG Mollala

Site Address: 28890 Hwy 213  
Mollala, OR 97038

USTC Log Number:

Date Approved: 3-9-93

Facility ID No.: 4625

Approved by: Rachel Segal

NORTHWEST REGION

Service Provider Information

Individual Name: Jeff Tyseling

Company Name: JT, Inc.

License No.: 11028

Address: 4508 NE Crystal Ln.  
Portland, OR 97218

This is to confirm that verbal authorization has been given to backfill or close the excavation located at the facility referenced above, pursuant to OAR 340-162-020(7) or OAR 340-163-020(6). Following completion, a copy of your signed checklist, as required by OAR 340-162-020(5) or OAR 340-163-020(4) and a copy of your final report, as required by OAR 340-122-350 must be submitted to the Department.

This authorization merely signifies that the Department was notified of a proposed excavation closure and was unable to schedule a field inspection at that time.

Authorization to close is not a Department determination that the soil cleanup has been completed in compliance with the requirements of OAR 340, Division 122. Upon a review of the checklist and final report referenced above, the Department will make a final determination on compliance with numeric cleanup standards. If you have any questions, please contact the Northwest Region at 503-229-5263.

cc: UST Compliance Section, HSW  
UST Cleanup Section, ECD  
NWR UST Cleanup project file  
NWR Service Provider file



1500 SW First Avenue  
Suite 750  
Portland, OR 97201-5884  
(503) 229-5263  
DEQ-1





NWR

Oregon Department of Environmental Quality  
**UNDERGROUND STORAGE TANK DECOMMISSIONING/SERVICE CHANGE REPORT**

DEQ FACILITY NUMBER:

4625

DATE:

3-1-93

FACILITY NAME:

RSG Molalla

FACILITY ADDRESS:

28890 Hwy 213

Molalla Or. 97038

PHONE:

829 7200

UST # 03-92-138

The following information **MUST** be submitted by the underground storage tank owner, operator or licensed DEQ Supervisor within 30 days following completion of the tank decommissioning or changing tank contents to a non-regulated substance. (OAR 340-150-001 though -150)

The attached supplemental checklist should be prepared by the person performing the decommissioning. The checklist should be provided to DEQ and the tank owner to demonstrate that all required practices were followed.

Ordinarily the checklist is filled out by the DEQ licensed Service Provider or Supervisor. Owners who wish to personally decommission a tank must follow all DEQ and other applicable standards. The owner should contact the DEQ Regional Office prior to starting the decommissioning to receive current copies of underground storage tank regulations.

**A. DATES:**

Decommissioning/Service Change Notice - Date Submitted: 1-15-92 (30 days before work starts)

Work Start Telephone Notice - Date Submitted: 2-17-92 (3 working days before work starts)

DEQ Person Notified: UK

Date Work Started: 2-20-92

Date Work Completed: 2-27-92

**Note:** Provide the following information if any soil or water contamination is found during the decommissioning. Contamination must be reported by the UST owner or operator within 24 hours. The licensed service provider must report contamination within 72 hours after discovery unless previously reported.

Date Contamination Reported: 2-27-92 By: Jeff Tyndall Department of Environmental Quality

DEQ Person Notified:

Julie Meyers

Backfill Telephone Notice - Date Called:

(before backfilling)

DEQ Person Notified:

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UST Compliance Section

**B. PERMITS:**

**Note:** DEQ permits or an addendum to the UST permit(s) may be needed where soil or water cleanup is required.

DEQ Water Discharge Permit #: NPDES-100929 Date: 7-10-92

Disposed to (Location):

Tributary of Molalla River

DEQ Solid Waste Disposal Permit #:

Date:

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APR 19 1993



## B. PERMITS (Continued)

UST Soil Treatment Permit Addendum - Type: \_\_\_\_\_ Date: \_\_\_\_\_

Soil Disposal or Treatment Location: \_\_\_\_\_

## C. TANK INFORMATION:

| Tank # | DEQ UST Permit | Tank Size in (Gallons) | Product: Gasoline, Diesel, Used Oil, Other? |        | Closure or Service Change? |                              |                          | Tank to be Replaced?                |                                     |
|--------|----------------|------------------------|---------------------------------------------|--------|----------------------------|------------------------------|--------------------------|-------------------------------------|-------------------------------------|
|        |                |                        | Present                                     | New    | Tank Removal               | Closure <sup>∞</sup> Inplace | New <sup>∞</sup> Product | Yes*                                | No                                  |
| 1      |                | 10,000                 | Diesel                                      | Diesel |                            |                              |                          | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2      |                | 5,000                  | Abandoned                                   | Diesel |                            |                              |                          | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
|        |                |                        |                                             |        |                            |                              |                          |                                     |                                     |
|        |                |                        |                                             |        |                            |                              |                          |                                     |                                     |
|        |                |                        |                                             |        |                            |                              |                          |                                     |                                     |

\* Where decommissioned tank(s) are replaced by new underground storage tanks the UST owner or operator must submit a new permit application containing information on the new tanks 30 days before placing them in service.

<sup>∞</sup> Submit a soil sampling plan to the DEQ regional office and receive plan approval prior to starting work if 1) tank is to be decommissioned in-place, 2) tank contents are changed to a non-regulated substance, or 3) tank contains a regulated substance other than petroleum.

## D. DISPOSAL INFORMATION:

| Tank # | Tank & Piping Disposal Method |           |       |                                       | Disposal Location of Tank Contents *           |                                                |
|--------|-------------------------------|-----------|-------|---------------------------------------|------------------------------------------------|------------------------------------------------|
|        | Scrap                         | Land-fill | Other | Identify Location & Property Owner    | Liquids                                        | Sludges                                        |
| 1      | X                             |           |       | John Charlton<br>Estacade Or. 6307795 | HEDDEN Home Oil Recycling<br>EPA# ORD981770431 | HEDDEN Home Oil Recycling<br>EPA# ORD981770431 |
| 2      | X                             |           |       | John Charlton<br>Estacade Or. 6307795 | Tank Previously Abandoned<br>Filled with Sand  | "                                              |
|        |                               |           |       |                                       |                                                |                                                |
|        |                               |           |       |                                       |                                                |                                                |
|        |                               |           |       |                                       |                                                |                                                |

\* Note: The tank contents, the tank and the piping may be subject to the requirements of Hazardous Waste regulations. If you have questions, contact the DEQ Hazardous Waste Section at (503) 229-5913 or DEQ regional office hazardous waste staff.



# E. CONTAMINATION INFORMATION:

| Tank # | Ground* water in pit? | Product odor in soil? | Product stains in soil? | Number of Samples | Laboratory (Name, City, State, Phone) |
|--------|-----------------------|-----------------------|-------------------------|-------------------|---------------------------------------|
| 1      | No                    | Yes                   | Yes                     | 2                 |                                       |
| 2      | No                    | Yes                   | Yes                     | 2                 |                                       |
|        |                       |                       |                         |                   |                                       |
|        |                       |                       |                         |                   |                                       |
|        |                       |                       |                         |                   |                                       |

\* Note: Sampling is required if groundwater is encountered. See cleanup rules.

## F. SITE SKETCH:

(Show location of adjacent roads, property lines, structures, dispenser, & all USTs) (Show North, general direction of ground slope and soil sample locations. Sketch does not need to be drawn to scale. You may attach a separate drawing.)



## G. WORK PERFORMED BY:

DEQ Service Provider's License #: 11028 Construction Contractors License #: 41495

Name: Jeff Tyseing Enterprises

Telephone: 287.3797

DEQ Decommissioning Supervisor's License #: 10837

Name: Frank McElheran

Telephone: 287.3797

DEQ Soil Matrix Service Provider's License #: \_\_\_\_\_ (If applicable)

Name: Jeff Tyseing Enterprises

Telephone: 287.3797

DEQ Soil Matrix Supervisor's License #: 10838 (If applicable)

Name: Jeff Tyseing

Telephone: 287.3797

## H. ATTACHMENTS TO THIS REPORT:

1. Attach a copy of the laboratory report showing the results of all tests on all soil and water samples. The laboratory report must identify sample collection methods, sample location, sample depth, sample type (soil or water), type of sample container, sample temperature during transportation, types of tests, and copies of analytical laboratory reports, including QA/QL information. Include laboratory name, address and copies of chain-of-custody forms.

2. If contamination is detected and a Level 2 or Level 3 soil matrix cleanup standard is selected attach a copy of the soil matrix analysis for the site including methods of determining soil type, depth to groundwater, and sensitivity of uppermost aquifer.

## I. REPORT FILING:

This report, signed by the tank owner or operator, complete with all applicable attachments must be filed with DEQ headquarters within 30 days after the excavation is backfilled or change-in-service is complete. Contact the DEQ regional office prior to filing this report where special circumstances exist at the site (such as water in pit, remaining pockets or contamination, etc.).

**NOTE:** If contamination was found during site assessment at decommissioning or change-in-service and reported to DEQ regional office, this report may be submitted with either the first interim cleanup report or the final cleanup report, whichever is first.

Return Completed Form to: Department of Environmental Quality  
UST Program - Decommissioning Report  
811 S.W. Sixth Ave.  
Portland, Oregon 97204

I have personally reviewed this report and the attachments and find them to be true and complete.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
(Owner or Operator)

For information: (503) 229-5733 or Toll Free in Oregon 1-800-452-4011



# JT Inc.

*Excavation and General Contracting Services*

P.O. Box 748  
Estacada, OR 97203

(503) 287-3797  
(503) 936-8348

D.E.Q. NORTHWEST REGION  
1500 S.W. FIRST SUITE 750  
PORTLAND, OREGON 97201

RE: R.S.G. MOLALLA DECOMMISSIONING

Three sand samples of soil were taken on 1-19-93. Samples A and C detected no diesel, sample B which was the pit floor showed some contamination. (See page 1. thru 3.) Further excavation was necessary due to additional contamination.

After excavation another soil sample was taken of the pit floor on 1-26-93 which detected no gasoline or diesel. (See pages 4. thru 5.)

Soil samples were taken on 2-26-93. Sample 1 which is the south bottom of tank pit detected no diesel. Sample 2 which was taken of the north bottom of tank pit detected some contamination. (See pages 6. thru 7.) Further excavation was necessary. There was approximately 300 yards of soil removed, it was then covered with 6 mil. plastic and stored on site.

Soil samples were taken again after excavation of north bottom and south bottom tank pit. The test results show tank pit floor and walls are free of contamination in tested areas. We believe the tank pit to be clean of contamination but cannot guarantee that the sampling could have missed some contamination. (See page 8.)

Approximately 320 yards were removed from tank pit area and stored on site, covered with plastic for future treatment as authorized by R.S.G.

## MATRIX CLEANUP EXCAVATION CLOSURE APPROVAL

### Site Information

Site Name: RSG Mollala

Site Address: 28890 Hwy 213  
Mollala, OR 97038

USTC Log Number:

Date Approved: 3-9-93

Facility ID No.: 4625

Approved by: Rachel Segal

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

NORTHWEST REGION

### Service Provider Information

Individual Name: Jeff Tyseling

Company Name: JT, Inc.

License No.: 11028

Address: 4508 NE Crystal Ln.  
Portland, OR 97218

This is to confirm that verbal authorization has been given to backfill or close the excavation located at the facility referenced above, pursuant to OAR 340-162-020(7) or OAR 340-163-020(6). Following completion, a copy of your signed checklist, as required by OAR 340-162-020(5) or OAR 340-163-020(4) and a copy of your final report, as required by OAR 340-122-350 must be submitted to the Department.

This authorization merely signifies that the Department was notified of a proposed excavation closure and was unable to schedule a field inspection at that time.

Authorization to close is not a Department determination that the soil cleanup has been completed in compliance with the requirements of OAR 340, Division 122. Upon a review of the checklist and final report referenced above, the Department will make a final determination on compliance with numeric cleanup standards. If you have any questions, please contact the Northwest Region at 503-229-5263.

cc: UST Compliance Section, HSW  
UST Cleanup Section, ECD  
NWR UST Cleanup project file  
NWR Service Provider file

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1500 SW First Avenue  
Suite 750  
Portland, OR 97201-5884  
(503) 229-5263

DEQ-1







Mollala  
RSG Decommission

Report Date: January 21, 1993

Job#: TP-930119AR-3

PO#: None

Project#: None

Project: RSG Tank Decommission

Attention: Jeff Tyseling  
Jeff Tyseling Enterprises  
P.O. Box 748  
Estacada, OR 97023

**SAMPLE INFORMATION:**

Date Samples Were Received By Laboratory: 01/19/93

| Lab No. | Field Identification     | Sample Matrix | Date     | Time |
|---------|--------------------------|---------------|----------|------|
| 1       | A South East Corner Wall | Sand          | 01-19-93 | 0845 |
| 2       | B Pit Floor              | Sand          | 01-19-93 | 0845 |
| 3       | C West Wall              | Sand          | 01-19-93 | 0845 |

ANALYTICAL RESULTS ARE ON THE FOLLOWING PAGE(S)

Sincerely,

*Susan M. Coffey*  
Susan Coffey  
President

SMC/mlh

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.

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NORTHWEST REGION

COFFEY LABORATORIES, INC.

12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452



Job#: TP-930119AR-3

Jeff Tyseling Enterprises  
Page 2

Analysis Performed: TPH-D, by the Oregon DEQ Method, Capillary GC/FID.

Sample ID: A South East Corner Wall  
B Pit Floor  
C West Wall

| <u>PARAMETER</u>       | <u>DETECTION<br/>LIMIT</u> | <u>SAMPLE A<br/>RESULTS</u> | <u>SAMPLE A<br/>DUPLICATE</u> | <u>SAMPLE B<br/>RESULTS</u> |
|------------------------|----------------------------|-----------------------------|-------------------------------|-----------------------------|
| Diesel                 | 10                         | ND                          | ND                            | 1,600                       |
| Surrogate Recovery (%) |                            | 90                          | 91                            | 106                         |

| <u>PARAMETER</u>       | <u>DETECTION<br/>LIMIT</u> | <u>SAMPLE C<br/>RESULTS</u> |
|------------------------|----------------------------|-----------------------------|
| Diesel                 | 10                         | ND                          |
| Surrogate Recovery (%) |                            | 65                          |

Results expressed as mg/kg unless otherwise noted.

ND means none detected at or above the detection limit listed.



# JT Inc.

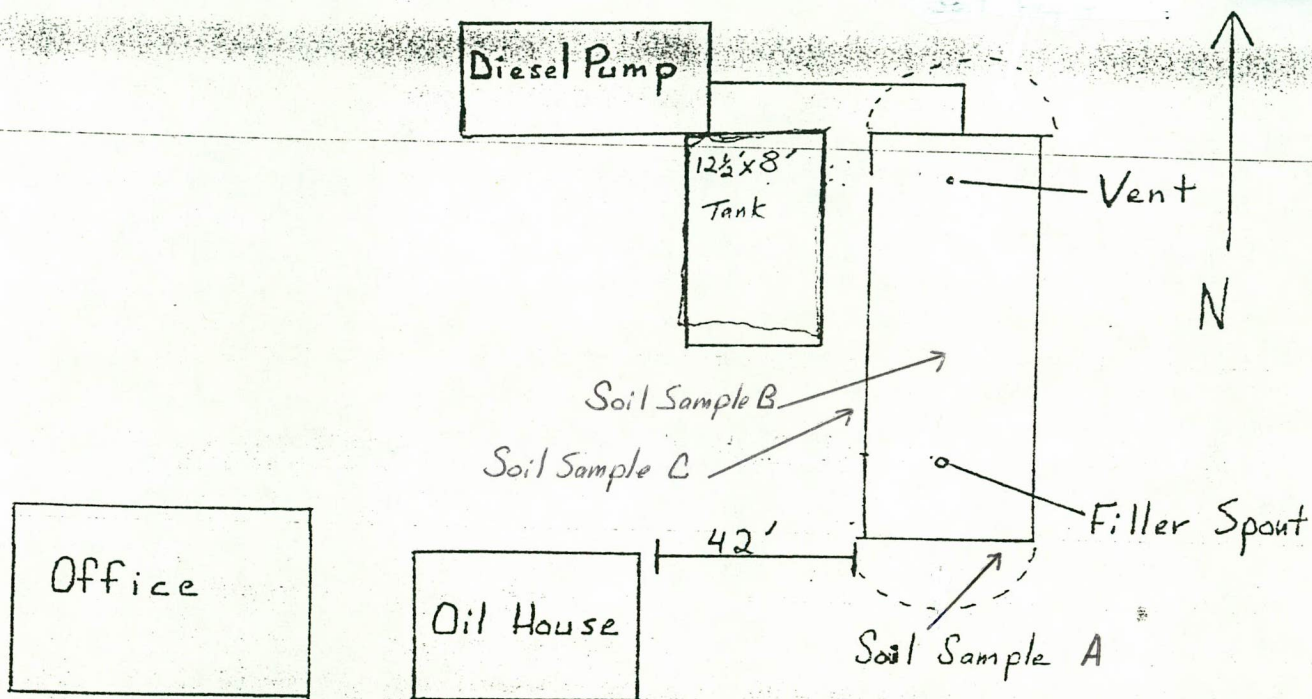
Excavation and General Contracting Services

Box 748  
La, OR 97203

(503) 287-3797  
(503) 936-8348

RSG MOLALLA  
(Not to Scale)

Initial  
Soil  
Sampling



No other buildings within 500 ft.

Attention: Jeff Tyseling  
Jeff Tyseling Enterprises  
P.O. Box 748  
Estacada, OR 97023

Report Date: January 29, 1993  
Job#: TP-930126A1-1  
PO#: None  
Project#: RSG  
Project: RSG

## SAMPLE INFORMATION:

Date Samples Were Received By Laboratory: 01/26/93

| Lab No. | Field Identification | Sample Matrix | Date     | Time |
|---------|----------------------|---------------|----------|------|
| 1       | A) Bottom of Pit     | Soil          | 01-26-93 | 1245 |

ANALYTICAL RESULTS ARE ON THE FOLLOWING PAGE(S).

Sincerely,

Susan M. Coffey  
President

SMC/mlh

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.

**DRAFT**



Job#: TP-930126A1-1

Jeff Tyseling Enterprises  
Page 2

Analysis Performed: TPH-HCID Qualitative Scan for Hydrocarbons, by GC/FID

Sample ID: A) Bottom of Pit

Summary of Qualitative Screening Test:

SAMPLE A)  
RESULTS

Gasoline detected by TPH-HCID

Gasoline not detected by TPH-HCID ✓

Diesel detected by TPH-HCID

Diesel not detected by TPH-HCID ✓

Hydrocarbons heavier than C28 detected

Recommended further analysis:

TPH-G

TPH-D

TPH-418.1

None ✓

Surrogate Recovery %

86

**DRAFT**



RSG Mollha  
Tank Decons

Report Date: February 20, 1993

Job#: TP-930216AA-2

PO#: None

Project#: None

Project: RSG

Attention: Jeff Tyseling  
Jeff Tyseling Enterprises  
P.O. Box 748  
Estacada, OR 97023

**SAMPLE INFORMATION:**

Date Samples Were Received By Laboratory: 02/16/93

| Lab No. | Field Identification | Sample Matrix | Date     | Time |
|---------|----------------------|---------------|----------|------|
| 1       | S Bottom Tank Pit    | Soil          | 02-16-93 | 1315 |
| 2       | N Bottom Tank Pit    | Soil          | 02-16-93 | 1315 |

**ANALYTICAL RESULTS:**

Analysis Performed: TPH-D, by the Oregon DEQ Method, Capillary GC/FID.

| <u>PARAMETER</u>       | <u>DETECTION<br/>LIMIT</u> | <u>SAMPLE #1<br/>RESULTS</u> | <u>SAMPLE #2<br/>RESULTS</u> | <u>SAMPLE #2<br/>DUPLICATE<br/>RESULTS</u> |
|------------------------|----------------------------|------------------------------|------------------------------|--------------------------------------------|
| Diesel                 | 10                         | ND                           | 27                           | 22                                         |
| Surrogate Recovery (%) |                            | 94                           | 76                           | 93                                         |

Results expressed as mg/kg unless otherwise noted.

ND means none detected at or above the detection limit listed.

Sincerely,

*Susan M. Coffey*

Susan Coffey  
President

SMC/lws

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.

**COFFEY LABORATORIES, INC.**

12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452



# JT Inc.

Excavation and General Contracting Services

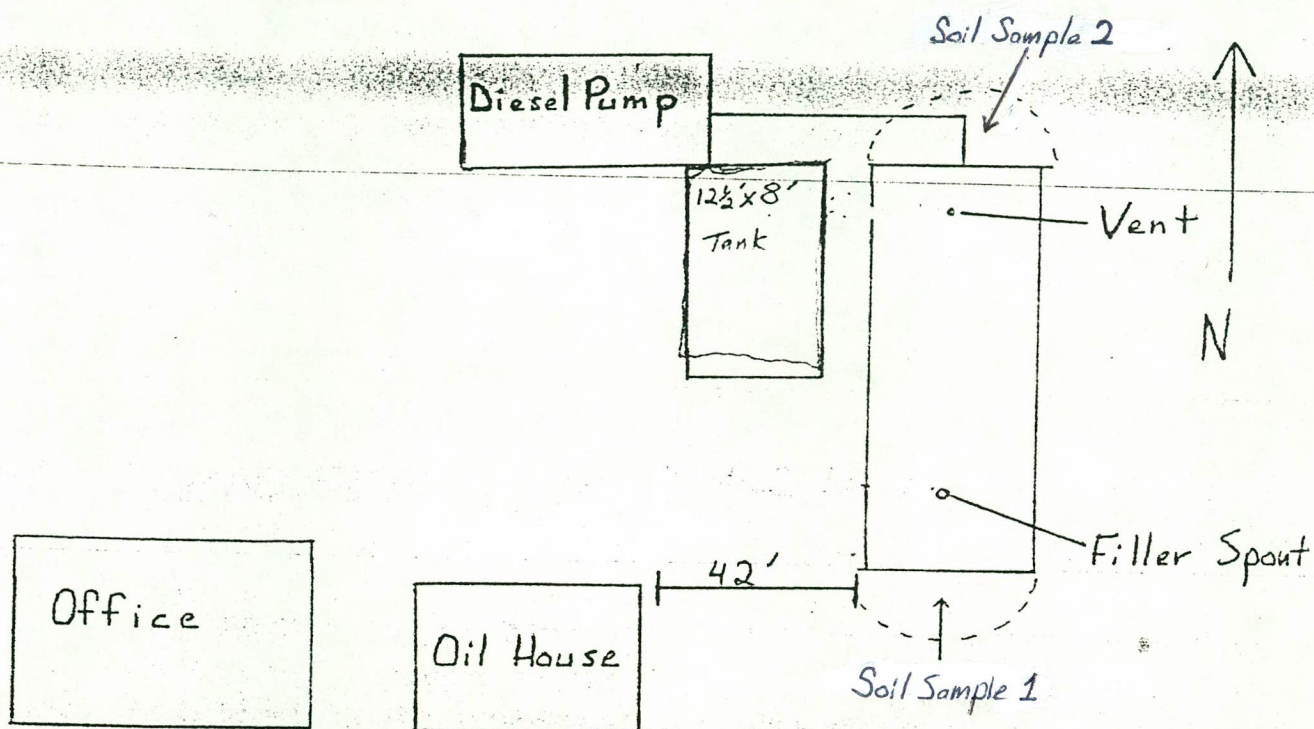
Box 748  
La, OR 97203

(503) 287-3797

(503) 936-8348

RSG MOLALLA  
(Not to Scale)

Final  
Soil Sampling



No other buildings within 500 ft.

Report Date: March 2, 1993  
 Job#: TP-930226B-2  
 PO#: None  
 Project#: None  
 Project: RSG

Attention: Jeff Tyseling  
 Jeff Tyseling Enterprises  
 P.O. Box 748  
 Estacada, OR 97023

**SAMPLE INFORMATION:**

Date Samples Were Received By Laboratory: 02/26/93

| Lab No. | Field Identification     | Sample Matrix | Date     | Time |
|---------|--------------------------|---------------|----------|------|
| 1       | North Bottom of Tank Pit | Soil          | 02-25-93 | 1310 |
| 2       | South Bottom of Tank Pit | Soil          | 02-25-93 | 1305 |

**ANALYTICAL RESULTS:**

Analysis Performed: TPH-D, by the Oregon DEQ Method, Capillary GC/FID.

| PARAMETER              | DETECTION<br>LIMIT | SAMPLE #1<br>RESULTS | SAMPLE #2<br>RESULTS | SAMPLE #2<br>DUPLICATE<br>RESULTS |
|------------------------|--------------------|----------------------|----------------------|-----------------------------------|
| Diesel                 | 10                 | ND                   | ND                   | ND                                |
| Surrogate Recovery (%) |                    | 88                   | 91                   | 84                                |

Results expressed as mg/kg unless otherwise noted.

ND means none detected at or above the detection limit listed.

Sincerely,

Susan M. Coffey  
 President

SMC/lws

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.



TELEPHONE USE REPORT

CALL FROM/TO: Jeff Tyseling DATE: 12/22/92  
 COMPANY/TITLE: \_\_\_\_\_ TIME: \_\_\_\_\_  
 PHONE NO.: 287 - 3797 (Circle for filing)  
 CITY: \_\_\_\_\_ COUNTY: \_\_\_\_\_ AQ Asbestos  
 \_\_\_\_\_ WQ OSS  
 \_\_\_\_\_ SW HW  
 \_\_\_\_\_ General Spill

RSG Forest Products  
03-92-138

SUMMARY OF CALL:

Have not done cleanup yet. were planning  
to complete cleanup in next several weeks.  
Discussed cost recovery + Soil analysis.  
Explained that, although they have submitted  
a permit addendum, they need to send a  
letter, or as part of report, an explanation that  
soil hadn't been removed yet and treatment  
was to begin (by a certain date). Explained that,  
since the contamination is diesel, treatment might  
not be effective and that they might want to  
consider bio treatment.

Andee Pollock  
 Signature



**Oregon Department of Environmental Quality  
UNDERGROUND STORAGE TANK DECOMMISSIONING CHECKLIST**

DEQ FACILITY NUMBER: 4625 DATE: \_\_\_\_\_  
 FACILITY NAME: R.S.G. Lumber Mollalla Div.  
 FACILITY ADDRESS: 28890 Hwy 213  
Mollalla, Or. 97038  
 PHONE: 829-7200

**A. SAFETY EQUIPMENT ON JOB SITE:**

Fire Extinguisher: Type/Size: 3-10, A, B, C  
 Combustible Gas Detector: Model: MSA-2A  
 Oxygen Analyzer: Model: \_\_\_\_\_

Recharge Date: 9-92Calibration Date: New 12-15-91

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

**B. DECOMMISSIONING: All Tanks: (Unk. = Unknown, N/A = Not Applicable)  
(Check Appropriate Box)**

1. All electrical equipment grounded and explosion proof?

2. Safety equipment on job site?

3. Overhead electrical lines located?

4. Subsurface electrical lines off or disconnected?

5. Natural gas lines off or disconnected?

6. No open fires or smoking material in area?

7. Vehicle and pedestrian traffic controlled?

8. Excavation material area cleared?

9. Rainwater runoff directed to treatment area?

10. Drained and collected product from lines?

11. Removed product and residual from tank?

12. Cleaned tank?

13. Excavated to top of tank?

14. Removed tank fixtures? (pumps, leak detection equip.)

15. Removed product, fill and vent lines?

Department of Environmental Quality

**RECEIVED**  
 AUG 5 1992  
*only*  
**UST Compliance Section**

DEPT OF ENVIRONMENTAL QUALITY  
**RECEIVED**

AUG 10 1992

NORTHWEST REGION

| Yes | No | Unk | N/A |
|-----|----|-----|-----|
| X   |    |     |     |
| X   |    |     |     |
| X   |    |     |     |
| X   |    |     |     |
|     |    |     | X   |
| X   |    |     |     |
| X   |    |     |     |
| X   |    |     |     |
| X   |    |     |     |
| X   |    |     |     |
| X   |    |     |     |
|     |    |     | X   |
| X   |    |     |     |

**C. TANK ABANDONMENT IN-PLACE:**

16. Sampling plan approved by DEQ?

Date: \_\_\_\_\_ DEQ Staff: \_\_\_\_\_

|  |  |  |   |
|--|--|--|---|
|  |  |  | X |
|--|--|--|---|



**B. DECOMMISSIONING: All Tanks: (Unk. Unknown, N/A = Not Applicable)**  
(Check Appropriate Box)

17. Contamination concerns fully resolved?

18. Fill Material? Type: \_\_\_\_\_

| Yes | No | Unk | N/A |
|-----|----|-----|-----|
| X   |    |     |     |
|     |    |     | X   |

**D. TANK REMOVAL:**

19. Tank placement area cleared, chocks placed?

20. Purged or ventilated tank to prevent explosion?

Method used: \_\_\_\_\_ Meter reading: \_\_\_\_\_

21. No chains or steel cables wrapped around tank for removal?

22. Tank removed, set on ground, blocked to prevent movement?

23. Tank set on truck and secured with strap(s)?

24. Tank labeled before leaving site?

|   |  |  |   |
|---|--|--|---|
| X |  |  |   |
|   |  |  | X |
| X |  |  |   |
| X |  |  |   |
| X |  |  |   |

**E. SITE ASSESSMENT:**

25. Site assessed for contamination? See OAR 340-122-340

26. Soil samples taken and analyzed?

27. Decommissioning/Change-in-Service report sent to DEQ?

28. Was contamination found? Date/Time: \_\_\_\_\_

29. Was contamination reported to DEQ? By: letter  
Date/Time: \_\_\_\_\_ DEQ Staff: \_\_\_\_\_

30. Was hazardous waste determination made for tank contents (Liquids/sludges)?

|   |   |   |  |
|---|---|---|--|
| X |   |   |  |
| X |   |   |  |
|   |   | X |  |
| X |   |   |  |
| X |   |   |  |
|   | X |   |  |

31. Disposal location of tank(s) contents.

Name: Hidden Home Oil Recycling Date: 2-25-92

Address: 22570 SE Van Curren Rd  
Estacada, Or. 97023

Attach disposal receipt.

32. Disposal or recycling location of removed tank(s) and associated piping.

Name: R.S.G.

Date: 2-20-92

Address: 28890 Hwy 213  
Molla/la, Or 97038

Attach disposal receipt.

33. If tank(s) are intended to be reused, identify new tank site.

Name: \_\_\_\_\_

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

Address: \_\_\_\_\_

Purpose of Reuse: \_\_\_\_\_

**F. WORK PERFORMED BY:**

DEQ Service Provider's License #: 11028  
Name: Jeff Tyseling  
Telephone: 630-3674

DEQ Decommissioning Supervisor's License #: 10837  
Name: Frank McElheran  
Telephone: 630-3674

**E. CHECKLIST FILING:**

1. Provide copy of checklist to the UST owner and operator.
2. Send completed checklist to the DEQ headquarters within 30 days after the excavation is backfilled.

**NOTE:** If contamination was found during decommissioning and reported to DEQ regional office, this report may be submitted with either the first interim cleanup report or the final cleanup report, whichever is first.

Send Completed and Signed Form to: Department of Environmental Quality  
UST Program - Decommissioning Checklist  
811 S.W. Sixth Ave.  
Portland, Oregon 97204

Or FAX Completed and Signed Form to: (503) 229-6954

I have personally reviewed this decommissioning checklist and find it to be true and complete.

Signature: [Signature] Date: 7-20-92  
(Licensed Supervisor)

Signature: [Signature] Date: 7-27-92  
(Owner or Operator)

For information: (503) 229-5733 or Toll Free in Oregon UST HELPLINE 1-800-742-7878



# JT Inc.

*Excavation and General Contracting Services*

P.O. Box 748  
Estacada, OR 97203

(503) 287-3797  
(503) 936-8348

R.S.G. MOLALLA

February 20, 1992 first tank was removed, which contained diesel. Size of tank was a 25'x 8'. Explosive Gas Indicator showed a reading of 5% inside of tank. Tank laid from north to south with approximately 6' of cover on the south end, which tapered down to approximately 1' from cover of north end of tank, the ground level dropped to level of the bottom of tank. No ground water was present in tank excavation pit.

February 21, 1992 soil samples were taken of north and south ends of tank, at that time a qualitative screen test was taken, diesel was then detected. Attached reports show that contamination is present.

Indication of spillage was emanating from fill spout in approximately a 6' diameter on the ground. The soil was green in color, and had a diesel odor. Soil appeared bad along entire length of tank, also on both sides of tank. The area which appeared the worst was near the fill spout. Fill spout has 4' of pipe leading to tank, there may also be some more contamination above tank. Further tests on the same samples indicate the amount of contamination, see attached test results.

During excavation we encountered an additional tank. Tank is reportedly to have been abandoned twenty some years ago. Tank measures 12½'x 8' laying within 6' of known tank. Tank lays from north to south. No product lines or filler spouts are connected to tank. Tank is filled with sand material.

The site is an enclosed mill yard of approximately 100 acres.



# JT Inc.

*Excavation and General Contracting Services*

---

P.O. Box 748  
Estacada, OR 97203

(503) 287-3797  
(503) 936-8348

R.S.G. MOLALLA

June 8, 1992 second tank was located, adjacent to the first one, tank was then removed. At that time tank was filled with sand, product lines and fill spout were not connected. Tank was stored on site to be sold for scrap, sand contents were emptied into tank pit and will be removed and airated at a later date.



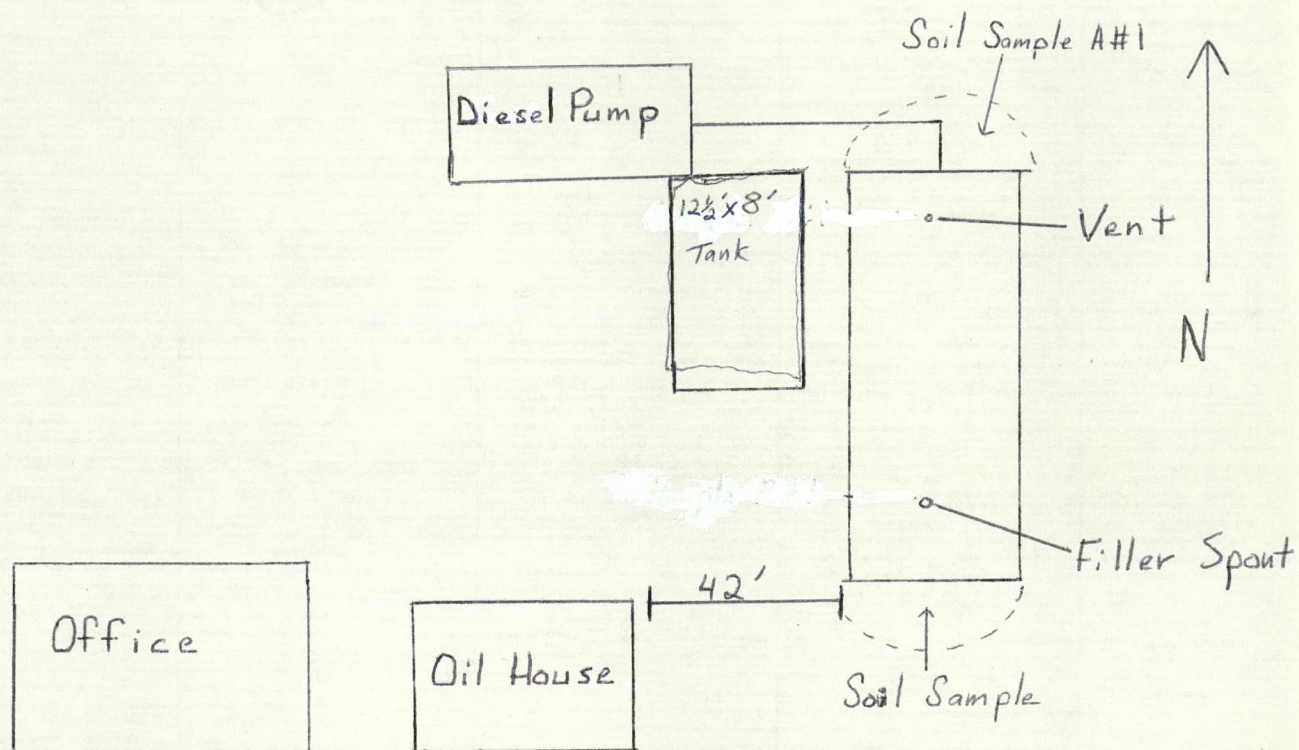
# JT Inc.

Excavation and General Contracting Services

P.O. Box 748  
Estacada, OR 97203

(503) 287-3797  
(503) 936-8348

RSG MOLALLA  
(Not to Scale)



No other buildings within 500 ft.



Report Date: February 27, 1992  
Job#: TP-920221AH-2

Attention: Jeff Tyseling  
Jeff Tyseling Enterprises  
P.O. Box 748  
Estacada, OR 97023

SAMPLE INFORMATION:

Date Samples Were Received By Laboratory: 02/21/92

| Lab No. | Field Identification | Sample Matrix | Date     | Time |
|---------|----------------------|---------------|----------|------|
| -----   | -----                | -----         | ----     | ---- |
| 1       | A #1                 | Soil          | 02-21-92 | 1208 |
| 2       | B #1                 | Soil          | 02-21-92 | 1208 |

ANALYTICAL RESULTS ARE ON THE FOLLOWING PAGE(S)

Sincerely,

  
Renee Chauvin  
Technical Director

RJC/lws

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.

COFFEY LABORATORIES, INC.

12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452





Jeff Tyseling Enterprises (Page 2)

Job#: TP-920221AH-2

**Analysis Performed:** TPH-HCID qualitative scan for Hydrocarbons, by GC/FID.

**Summary of Qualitative Screening Test:\***

|                                        | A #1<br>RESULTS<br>----- | B #1<br>RESULTS<br>----- |
|----------------------------------------|--------------------------|--------------------------|
| Gasoline detected by TPH-HCID          |                          |                          |
| -----                                  |                          |                          |
| Gasoline not detected by TPH-HCID      | ✓                        | ✓                        |
| -----                                  |                          |                          |
| Diesel detected by TPH-HCID            | ✓                        | ✓                        |
| -----                                  |                          |                          |
| Diesel not detected by TPH-HCID        |                          |                          |
| -----                                  |                          |                          |
| Hydrocarbons heavier than C28 detected |                          |                          |
| -----                                  |                          |                          |
| Recommended further analysis:          |                          |                          |
| TPH-G                                  |                          |                          |
| -----                                  |                          |                          |
| TPH-D                                  | ✓                        | ✓                        |
| -----                                  |                          |                          |
| TPH-418.1                              |                          |                          |
| -----                                  |                          |                          |
| None                                   |                          |                          |
| -----                                  |                          |                          |
| Surrogate Recovery %                   | NA*                      | NA*                      |
| -----                                  |                          |                          |

\*The samples were too contaminated to allow for calculation of surrogate spike recoveries.

**Analysis Performed:** TPH-D, by the Oregon DEQ Method, capillary GC/FID.

| PARAMETER<br>-----     | DETECTION<br>LIMIT<br>----- | A #1<br>RESULTS<br>----- | B #1<br>RESULTS<br>----- |
|------------------------|-----------------------------|--------------------------|--------------------------|
| Diesel                 | 10                          | 600                      | 980                      |
| Surrogate Recovery (%) |                             | 120                      | 55                       |

Results expressed as mg/kg unless otherwise noted.

**COFFEY LABORATORIES, INC.**

12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452

# CROSS - REFERENCE INFO.

Facility Name: RSG Forest Products

address: 28890 Hwy 213

Molalla

See also LUST # 03-92-138

See also facility VST # 4625

\* make copy - place one in LUST file and  
one in VST file.



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY  
UNDERGROUND STORAGE TANK PROGRAMPERMIT ADDENDUM FOR  
PETROLEUM CONTAMINATED SOILS MANAGEMENTON-SITE AT FACILITY ADDRESS LISTED BELOW

1. PLEASE FILL OUT ALL PAGES TO THE BEST OF YOUR ABILITY AND SEND TO THE APPROPRIATE REGIONAL OFFICE. (See back for mailing addresses and phone numbers)
2. PLEASE PRINT CLEARLY AND PROVIDE ALL THE NECESSARY SIGNATURES
3. PLEASE CONTACT THE REGIONAL OFFICE FOR ASSISTANCE.

DEQ UST FACILITY: (LOCATION OF TANK  
DECOMMISSIONING AND SOURCE OF SOILS.)DEQ FACILITY NUMBER 4625NAME RSGADDRESS 28890 Hwy 213CITY Molalla Or. ZIP 97038

## TANK OWNER

NAME RSGADDRESS 28890 Hwy 213ADDRESS Molalla OrPHONE 829 7200SIGNATURE RSG by [Signature]

## PROPERTY OWNER

NAME RSGADDRESS 28890 Hwy 213ADDRESS Molalla OrPHONE 829 7200SIGNATURE RSG by [Signature]

## PERMITTEE

NAME RSGADDRESS 28890 Hwy 213ADDRESS Molalla Or.PHONE 829 7200SIGNATURE RSG by [Signature]DEPT OF ENVIRONMENTAL QUALITY  
RECEIVEDJUL 6 1992  
NORTHWEST REGION



REGIONAL DEQ OFFICES

NORTHWEST REGION

811 S.W. 6th Ave.  
Portland, OR 97204  
Phone: Portland 229-5263

WILLAMETTE VALLEY REGION

750 Front St., NE, Suite 120  
Salem, OR 97310  
Phone: Salem 378-8240

SOUTHWEST REGION

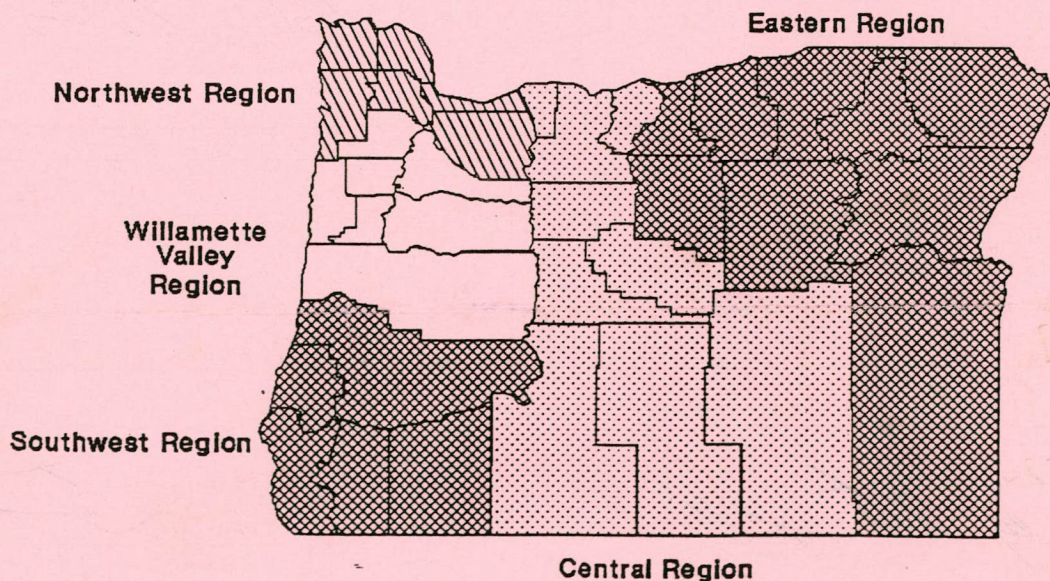
201 W. Main St., Suite 2-D  
Medford, OR 97501  
Phone: Medford 776-6010

CENTRAL REGION

2146 N.E. 4th  
Bend, OR 97701  
Phone: Bend 388-6146

EASTERN REGION

700 S.E. Emigrant, Suite 330  
Pendleton, OR 97801  
Phone: Pendleton 276-4063



RECEIVED  
JUL 8 1985  
NORTHWEST REGION  
DEPT OF ENVIRONMENTAL QUALITY



## UNDERGROUND STORAGE TANK PERMIT ADDENDUM

UST FACILITY NAME: \_\_\_\_\_ UST FACILITY ID: \_\_\_\_\_  
UST FACILITY ADDRESS: \_\_\_\_\_  
UST PERMIT NUMBERS: \_\_\_\_\_  
UST PERMIT AMENDMENT EXPIRATION DATE: \_\_\_\_\_

PAGE 2 OF 4

(THIS BOX FOR DEQ USE ONLY)

### MANAGEMENT OF PETROLEUM-CONTAMINATED SOILS

### ON-SITE AT FACILITY ADDRESS LISTED ABOVE

PERMIT ADDENDUM APPLICATION DATE: \_\_\_\_\_

ESTIMATED VOLUME OF PETROLEUM-CONTAMINATED:

SOIL IN TONS OR CUBIC YARDS 150 cu.yd.

TYPE OF PETROLEUM CONTAMINATION

CHECK ALL APPLICABLE

☐ GASOLINE ☒ DIESEL  
☐ WASTE OIL ☐ HEATING OIL  
☐ OTHER PETROLEUM (SPECIFY) \_\_\_\_\_

APPROXIMATE SIZE OF PROPERTY:

ACRES 50, OR SQUARE FEET \_\_\_\_\_, OR DIMENSIONS \_\_\_\_\_

[Signature]  
(SIGNATURE OF UST SERVICE PROVIDER)

UST SERVICE PROVIDER LICENSE NUMBER: 4008 11958

DEPT OF ENVIRONMENTAL QUALITY  
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JUL 6 1992  
NORTHWEST REGION

UST OWNER OR PERMITTEE SHALL  
RETAIN A COPY OF THIS RECORD FOR AT LEAST THREE YEARS



## UNDERGROUND STORAGE TANK PERMIT ADDENDUM

UST FACILITY NAME: \_\_\_\_\_ UST FACILITY ID: \_\_\_\_\_  
UST FACILITY ADDRESS: \_\_\_\_\_  
UST PERMIT NUMBERS: \_\_\_\_\_  
UST PERMIT AMENDMENT EXPIRATION DATE: \_\_\_\_\_

PAGE 3 OF 4

(THIS BOX FOR DEQ USE ONLY)

### MANAGEMENT OF PETROLEUM-CONTAMINATED SOILS ON-SITE AT FACILITY ADDRESS LISTED ABOVE

#### SPECIAL PERMIT CONDITIONS:

1. ON-SITE TREATMENT PERFORMANCE STANDARDS:
  - A. NO OBJECTIONABLE ODORS SHALL BE CREATED
  - B. NO FIRE HAZARD SHALL BE CREATED
  - C. SURFACE WATER RUNOFF OR RUN-ON SHALL BE CONTROLLED WITHIN THE TREATMENT AREA
  - D. GROUNDWATER AND SURFACES WATER SHALL BE PROTECTED
  - E. NON-CONTAMINATED SOILS SHALL BE PROTECTED
  - F. APPROPRIATE SITE SECURITY TO PREVENT UNAUTHORIZED ENTRY SHALL BE PROVIDED
2. DESCRIBE ON-SITE TREATMENT PROGRAM IN A WRITTEN, SUBMITTED REPORT WITHIN 30 DAYS OF STARTING CONSTRUCTION AND OPERATION OF ON-SITE TREATMENT PROGRAM. INCLUDE INITIAL PETROLEUM CONTAMINATIONS LEVELS USING SAMPLING PROCEDURES LISTED IN OAR 340-122-305 TO 340-122-360.
3. DEQ MAY REQUIRE WRITTEN PROGRESS REPORTS DOCUMENTING THE REDUCTION IN PETROLEUM CONTAMINATION. THE UST OWNER OR PERMITTEE SHALL PROVIDE A WRITTEN PROGRESS REPORT WITHIN 20 DAYS AFTER A DEQ REQUEST.
4. SUBMIT FINAL WRITTEN REPORT DOCUMENTING FINAL PETROLEUM CONTAMINATION LEVELS AND DISPOSITION OF TREATED SOILS.
5. NO OFF-SITE TREATMENT OR DISPOSAL OF PETROLEUM-CONTAMINATED SOILS IS AUTHORIZED BY THIS PERMIT ADDENDUM.
6. THIS PERMIT ADDENDUM DOES NOT AUTHORIZE THE VIOLATION OF ANY OTHER APPLICABLE STATE, FEDERAL OR LOCAL RULE.
7. DEQ SHALL BE NOTIFIED IF TREATMENT PROGRAM DEVIATES FROM PLAN.

---

UST OWNER OR PERMITTEE SHALL  
RETAIN A COPY OF THIS RECORD FOR AT LEAST THREE YEARS

---



UNDERGROUND STORAGE TANK  
PERMIT ADDENDUM

UST FACILITY NAME: \_\_\_\_\_ UST FACILITY ID: \_\_\_\_\_  
UST FACILITY ADDRESS: \_\_\_\_\_  
UST PERMIT NUMBERS: \_\_\_\_\_ (THIS BOX FOR DEQ USE ONLY)  
UST PERMIT AMENDMENT EXPIRATION DATE: \_\_\_\_\_

PAGE 4 OF 4

MANAGEMENT OF PETROLEUM-CONTAMINATED SOILS

ON-SITE AT FACILITY ADDRESS LISTED ABOVE

SPECIAL PERMIT CONDITIONS (CONTINUED):

8. IF ACTUAL VOLUME OF PETROLEUM-CONTAMINATED SOILS EXCEEDS ESTIMATED VOLUME BY 25 PERCENT, DEQ SHALL BE NOTIFIED IN WRITING OF ACTUAL VOLUME DISPOSED OF WITHIN 30 CALENDAR DAYS.

9. BY THEIR SIGNATURES, THE PROPERTY OWNER, TANK OWNER AND PERMITTEE LISTED ON PAGE 1 OF 4 OF THIS PERMIT APPLICATION/ADDENDUM CERTIFY THEY HAVE READ AND UNDERSTAND THE SPECIAL CONDITIONS LISTED IN THIS ADDENDUM.

10. OTHER SPECIAL CONDITIONS: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED  
JUL 6 1992  
NORTHWEST REGION

UST OWNER OR PERMITTEE SHALL  
RETAIN A COPY OF THIS RECORD FOR AT LEAST THREE YEARS



# RZA AGRA, Inc.

(Formerly: Rittenhouse-Zeman & Associates, Inc.)  
Engineering & Environmental Services

03-92-138  
DJS  
O.K.  
7477 SW Tech Center Drive  
Portland, Oregon 97223-8024  
(503) 639-3400  
FAX (503) 620-7892

August 31, 1992

RSG Forest Products  
P.O. Box 169  
Molalla, OR 97038

Attn: Mitchel Karp

**SUBJECT: N.P.D.E.S. PERMIT COMPLIANCE MONITORING  
AUGUST 1992**

DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED  
SEP 02 1992  
NORTHWEST REGION

Dear Mr. Karp:

Enclosed are the results from the inspection and analysis of water samples taken from the oil/water separator outfall at your Liberal, Oregon, facility. Our field visit was performed on August 6, 1992, which entailed a visual inspection of the outfall stream, and product removal system. We also sampled for total Oil and Grease as per your request and your NPDES permit compliance standards.

## FIELD VISIT SUMMARY

1. All floating product was/is being absorbed by absorbent pads installed across the existing separator system. A slight sheen was detected at the discharge point, however, no trace of product was detected at any point along the discharge stream.
2. All sampling and testing was performed in accordance with EPA recommended protocol and standard environmental sampling/testing procedures.
3. Sample analysis performed by:  
**RZA AGRA LABS**; an environmental analysis laboratory.

## INSPECTION AND ANALYSIS SUMMARY

**Parameter:** Weekly visual inspection.

**Standard:** No visible floating debris in outfall stream.

**Results:** Currently being monitored by RSG personnel.

**Parameter:** Monthly pH testing.

**Standard:** pH level reading >6.0 and <9.0 in outfall stream.

**Results:** Currently being monitored by RSG personnel.



**AGRA**

Earth & Environmental Group



**Parameter:** Quarterly sampling and analysis.

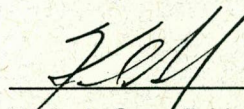
**Standard:** Total Oil and Grease levels (TOG) not to exceed 15 ppm in outfall stream.

**Results:** Sample 92-Q-3, (Sample name EFFLUENT) collected immediately below oil water separator over flow, and analyzed per EPA method 413.2. sample 92-Q-3 = 8.2 ppm.

We appreciate this opportunity to be of service to you and look forward to serving you again. Should you have any questions regarding these findings or any other projects you may have, please feel free to call the undersigned.

Respectfully submitted,

RZA AGRA, Inc.

  
\_\_\_\_\_  
Kevin A. Greenfield, Chief Environmental Technician  
\_\_\_\_\_  
Terry N. Craven, P.E.

Enclosures

c Doug Jones - ODEQ



**AGRA**

Earth & Environmental Group



TELEPHONE USE REPORT

CALL FROM/TO: Jeff Tapseling

DATE: 2/8/92

COMPANY/TITLE: " "

TIME: 1140

PHONE NO.: \_\_\_\_\_

(Circle for filing)

CITY: \_\_\_\_\_ COUNTY: \_\_\_\_\_

AQ Asbestos

WQ OSS

SW HW

General Spill

Re: RSG Forest Products  
03-92-138

SUMMARY OF CALL:

I told Jeff the permit addendum appeared to  
be in order and that they could proceed with  
on-site aeration.

Elizabeth M. Brady  
Signature



May 28, 1992

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

NORTHWEST REGION

MR JEFF TYSELING  
JEFF TYSELING ENTERPRISES  
PO BOX 748  
ESTACADA OR 97023

RE: RSG Forest Products  
File No. 03-92-138

Dear Mr. Tyseling:

As you requested, here is a letter summarizing our telephone conversations of May 15, 1992, and May 20, 1992. I had originally telephoned you in response to a letter you had submitted to the Department of Environmental Quality (DEQ) regarding the tank decommissioning at RSG Forest Products.

During our conversation, you indicated that a second tank had been discovered immediately adjacent to the diesel tank being decommissioned. The second tank had been filled with sand and RSG officials suspect the tank was filled at least 20 years ago. This second tank is not one of the tanks that DEQ shows as having been filled in place in 1989. Approximately 6 feet of dirt covers the tank and one side has been exposed as a result of decommissioning activities. Apparently there is soil contamination around the tank. You requested information as to what would be required by the DEQ so that you may advise your clients.

I suggested that the following options were available:

1. The tank could be pulled and the contamination remediated; or
2. The contamination could be left in place and the company could propose leaving a pocket of contamination, in accordance with Oregon Administrative Rule (OAR) 340-122-340 (1)(f). Please note that if this



1500 SW First Avenue  
Suite 750  
Portland, OR 97201-5884  
(503) 229-5263  
DEQ-1





Mr. Jeff Tyseling  
May 28, 1992  
Page 2

option is selected the rule requires that a sufficient number of samples shall be collected from the site in order to estimate the extent, volume and level of contamination in the pocket.

I asked about the sample results which were attached to the letter you submitted to the DEQ. You indicated the results were for samples obtained from beneath both ends of the tank which was being decommissioned. I informed you that depending on the Matrix cleanup level established for the site, further cleanup would need to be conducted.

I also asked why the contamination had not been reported to the DEQ in a timely manner. You responded that there had been almost a month long delay in your receiving the sample results and that you had trouble contacting the DEQ. I advised you of the 72 hour notification requirement for service providers to notify the DEQ of contamination.

I informed you that your firm, Jeff Tyseling Enterprises, is not a licensed Underground Storage Tank Soil Matrix Cleanup Service Provider, although you are a licensed soil matrix supervisor. I recommended that you apply for the Service Provider license and said I would request the required documents be mailed to you.

You mentioned that RSG was interested in aerating their soil on-site. I am enclosing a Permit Addendum for Petroleum Contaminated Soils that must be completed and returned to the Department. Please note the Special Permit Conditions described on pages three and four of the Permit Addendum.

If you have any further questions or require additional information, please contact me (503) 229-6385, ext. 230.

Sincerely,

*Elizabeth M. Brady*

Elizabeth M. Brady, REA  
UST Cleanup Specialist  
Northwest Region

enclosure

cc: UST Compliance Section, HSW-Dennis Thomason



TELEPHONE USE REPORT

CALL FROM/TO: Jeff Tyseling

DATE: 5/15/92

COMPANY/TITLE: Jeff Tyseling Enterprises

TIME: 1350

PHONE NO.: 287-3797

(Circle for filing)

CITY: Estacada COUNTY: Clackamas

AQ Asbestos

WQ OSS

SW HW

General Spill

Re: RSG Forest Products  
#03-92-138

SUMMARY OF CALL:

Tyseling had returned my call re: the letter we rec'd  
from him. While pulling the tank at RSG, they found an  
old tank filled with sand. RSG had no record of the  
tank and suspects it to be greater than 20 yrs. old. There  
is contamination around this tank. The sample results  
we rec'd are for the pit from which the tank was  
pulled - they were obtained from beneath the tank.  
The tank that they discovered was filled in place at least  
20 yrs. ago and is not one of the tanks that DEQ shows  
as filled in place. Tyseling said there is approx. 6' of  
dirt on top of the tank & one side is exposed. He  
wanted to know what DEQ would require. I told him  
I would check & call him back. I also told him  
that according to sample results & depending on matrix  
evaluation, the pit would most likely require further →

Elizabeth M. Brady  
Signature



remediation. I also said they could either pull the tank they discovered & clean-up the contamination, propose leaving the contamination in place, and suggested sampling because if contamination is below the matrix level for the site, may not need to take any action. Tyseberg also said no wells were nearby. He requested written confirmation of our conversation so that he could advise his clients. I asked him why the contamination wasn't reported and he said first there was a month long delay in him receiving the sample results & that he was having trouble contacting DEC. I explained 72-hour notification requirement and he said he had probably made a mistake — this was only his 2<sup>nd</sup> decommissioning.



From: Beth Brady:NWR:DEQ  
To: Cindy Salter:HSW  
Subj: UST Soil Matrix License

---

Cindy, please mail the appropriate application and information materials  
for the UST Soil Matrix SERVICE PROVIDER License to:

Jeff Tyseling  
Jeff Tyseling Enterprises  
PO Box 748  
Estacada OR 97023

Let me know if you need anything else. Thanks for your help, Beth.



UST Compliance Query

----- Facility -----

Facility ID 4625 SIC LUST facility N  
 Facility Name RSG FOREST PRODUCTS  
 Facility Address HWY. 213, P.O. BOX 169  
 City, ST Zip MOLALLA OR 97038  
 Comments

----- Tanks -----

|               |                          |               |         |
|---------------|--------------------------|---------------|---------|
| Tank ID       | 1                        | Contents:     |         |
| Tank Status   | FILLED                   | Empty         |         |
| Date Decomm.  | 01-SEP-89                | Petroleum     | DIESEL  |
| Permit #      | AKEAB                    | Haz. Material |         |
| Permit Status | TERMINATED               | Unknown       |         |
| Installed     | 08-MAY-64                | Construction  | STEEL   |
| Gallons       | 10000                    | External Prot | PAINTED |
| Overfill      |                          |               |         |
| Leak Detect   | VISUAL, STOCK INVENTORY, |               |         |

v Char Mode: Replace Page 1

Count: 1  
 97.0.0.1 14:40:39



UST Compliance Query

----- Facility -----

Facility ID 4625 SIC LUST facility N  
 Facility Name RSG FOREST PRODUCTS  
 Facility Address HWY. 213, P.O. BOX 169  
 City, ST Zip MOLALLA OR 97038  
 Comments

----- Tanks -----

|               |                          |               |          |
|---------------|--------------------------|---------------|----------|
| Tank ID       | 2                        | Contents:     |          |
| Tank Status   | FILLED                   | Empty         |          |
| Date Decomm.  | 01-SEP-89                | Petroleum     | GASOLINE |
| Permit #      | AKEAC                    | Haz. Material |          |
| Permit Status | TERMINATED               | Unknown       |          |
| Installed     | 08-MAY-64                | Construction  | STEEL    |
| Gallons       | 10000                    | External Prot | PAINTED  |
| Overfill      |                          |               |          |
| Leak Detect   | VISUAL, STOCK INVENTORY, |               |          |

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Count: 2

97.0.0.1 14:41:02



## UST Compliance Query

----- Facility -----

Facility ID 4625 SIC LUST facility N  
Facility Name RSG FOREST PRODUCTS  
Facility Address HWY. 213, P.O. BOX 169  
City, ST Zip MOLALLA OR 97038  
Comments

## ----- Tanks -----

|               |                          |               |         |
|---------------|--------------------------|---------------|---------|
| Tank ID       | 3                        | Contents:     |         |
| Tank Status   | ACTIVE                   | Empty         |         |
| Date Decomm.  |                          | Petroleum     | DIESEL  |
| Permit #      | AKEAD                    | Haz. Material |         |
| Permit Status | ACTIVE                   | Unknown       |         |
| Installed     | 08-MAY-74                | Construction  | STEEL   |
| Gallons       | 10000                    | External Prot | PAINTED |
| Overfill      |                          |               |         |
| Leak Detect   | VISUAL, STOCK INVENTORY, |               |         |

^ v Char Mode: Replace Page 1

Count: 3

97.0.0.1 14:41:08



|                 | -----        | Contacts            | -----    |
|-----------------|--------------|---------------------|----------|
| Permitee:       | Name         |                     |          |
|                 | Organization | RSG Forest Products |          |
|                 | Address1     | PO Box 169          |          |
|                 | Address2     |                     |          |
|                 | City, ST Zip | Molalla             | OR 97038 |
|                 | Phone1       | (503) 829-7200      |          |
| Owner:          | Name         |                     |          |
|                 | Organization | RSG Forest Products |          |
|                 | Address1     | PO Box 169          |          |
|                 | Address2     |                     |          |
|                 | City, ST Zip | Molalla             | OR 97038 |
|                 | Phone1       | (503) 829-7200      |          |
| Property Owner: | Name         |                     |          |
|                 | Organization | RSG Forest Products |          |
|                 | Address1     | PO Box 169          |          |
|                 | Address2     |                     |          |
|                 | City, ST Zip | Molalla             | OR 97038 |
|                 | Phone1       | (503) 829-7200      |          |



----- Compliance Payments -----

Facility ID 4625

Facility Name RSG FOREST PRODUCTS

| Invoice ID  | Status | Billed | Fee Received |
|-------------|--------|--------|--------------|
| UST92-02220 | PAID   | 25     | 25           |
| UST91-02495 | PAID   | 25     | 25           |
| UST90-02846 | PAID   | 25     | 25           |
| UST89-04565 | PAID   | 100    | 100          |

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Count: \*4

97.0.0.1 14:40:55



## UST Compliance Query

----- Facility -----

Facility ID 4625 SIC LUST facility N  
Facility Name RSG FOREST PRODUCTS  
Facility Address HWY. 213, P.O. BOX 169  
City, ST Zip MOLALLA OR 97038  
Comments

## ----- Tanks -----

|               |                          |               |         |
|---------------|--------------------------|---------------|---------|
| Tank ID       | 4                        | Contents:     |         |
| Tank Status   | FILLED                   | Empty         |         |
| Date Decomm.  | 01-SEP-89                | Petroleum     | DIESEL  |
| Permit #      | AKEAE                    | Haz. Material |         |
| Permit Status | TERMINATED               | Unknown       |         |
| Installed     | 08-MAY-74                | Construction  | STEEL   |
| Gallons       | 10000                    | External Prot | PAINTED |
| Overfill      |                          |               |         |
| Leak Detect   | VISUAL, STOCK INVENTORY, |               |         |

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Count: \*4

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# Route Slip



Date 5-11-90

| TO: | Name | Division/Section | Initial | Date |
|-----|------|------------------|---------|------|
| 1.  |      | NWR              |         |      |
| 2.  |      |                  |         |      |
| 3.  |      |                  |         |      |
| 4.  |      |                  |         |      |
| 5.  |      |                  |         |      |

|                          |                      |                          |                    |                          |                         |
|--------------------------|----------------------|--------------------------|--------------------|--------------------------|-------------------------|
| <input type="checkbox"/> | as requested         | <input type="checkbox"/> | investigate        | <input type="checkbox"/> | per conversation        |
| <input type="checkbox"/> | approval             | <input type="checkbox"/> | justify            | <input type="checkbox"/> | prepare reply           |
| <input type="checkbox"/> | comment              | <input type="checkbox"/> | necessary action   | <input type="checkbox"/> | return with more detail |
| <input type="checkbox"/> | confer               | <input type="checkbox"/> | initial and return | <input type="checkbox"/> | review and circulate    |
| <input type="checkbox"/> | for your information | <input type="checkbox"/> | note and file      | <input type="checkbox"/> | signature               |

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---

|                                  |                           |
|----------------------------------|---------------------------|
| <b>FROM:</b> <u>Cindy Satter</u> | Phone No. <u>229-6652</u> |
|----------------------------------|---------------------------|

Central Stores 97677

☐ See Other Side

Recycled Paper



JEFF TYSELING ENTERPRISES  
P.O. BOX 748  
ESTACADA, OR 97023

2873797 (46303674) Mobil 9368348

#03-92-138

Facility # 4625

RS G  
Forest Products

Subject: Decommissioning Molalla Div. Diesel Tank

28890 Hwy 213

Molalla Or. 97038

829 7200

Sirs:

Attached sample results for above site verify that contamination exists and is diesel. Contamination seems to be present throughout excavation pit with no groundwater present.

Excavation revealed previously abandoned fuel tank that was apparently filled with sand, that layed along side of removed tank.

Request that you contact me at your earliest convenience to discuss cleanup procedures so that I may advise client.

Thanks

Jeff A Tyse  
Jeff A Tyse

DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED

MAY 11 1992

NORTHWEST REGION

Department of Environmental Quality

RECEIVED  
APR 21 1992

UST Compliance Section

JEFF TYSELING ENTERPRISES  
P.O. BOX 748  
ESTACADA, OR 97023





Report Date: February 27, 1992  
Job#: TP-920221AH-2

Attention: Jeff Tyseling  
Jeff Tyseling Enterprises  
P.O. Box 748  
Estacada, OR 97023

**SAMPLE INFORMATION:**

Date Samples Were Received By Laboratory: 02/21/92

| Lab No. | Field Identification | Sample Matrix | Date     | Time |
|---------|----------------------|---------------|----------|------|
| 1       | A #1                 | Soil          | 02-21-92 | 1208 |
| 2       | B #1                 | Soil          | 02-21-92 | 1208 |

ANALYTICAL RESULTS ARE ON THE FOLLOWING PAGE(S)

Sincerely,

  
Renee Chauvin  
Technical Director

RJC/lws

This report is for the sole and exclusive use of the above-named client. Samples are retained 15 days from the report date, or until holding time expires. Results pertain only to samples submitted.

Department of Environmental Quality  
**RECEIVED**  
APR 21 1992  
UST Compliance Section

**COFFEY LABORATORIES, INC.**





Jeff Tyseling Enterprises (Page 2)

Job#: TP-920221AH-2

**Analysis Performed:** TPH-HCID qualitative scan for Hydrocarbons, by GC/FID.

**Summary of Qualitative Screening Test:\***

|                                        | A #1<br>RESULTS | B #1<br>RESULTS |
|----------------------------------------|-----------------|-----------------|
| Gasoline detected by TPH-HCID          |                 |                 |
| Gasoline not detected by TPH-HCID      | ✓               | ✓               |
| Diesel detected by TPH-HCID            | ✓               | ✓               |
| Diesel not detected by TPH-HCID        |                 |                 |
| Hydrocarbons heavier than C28 detected |                 |                 |
| Recommended further analysis:          |                 |                 |
| TPH-G                                  |                 |                 |
| TPH-D                                  | ✓               | ✓               |
| TPH-418.1                              |                 |                 |
| None                                   |                 |                 |
| Surrogate Recovery %                   | NA*             | NA*             |

\*The samples were too contaminated to allow for calculation of surrogate spike recoveries.

**Analysis Performed:** TPH-D, by the Oregon DEQ Method, capillary GC/FID.

| PARAMETER              | DETECTION<br>LIMIT | A #1<br>RESULTS | B #1<br>RESULTS |
|------------------------|--------------------|-----------------|-----------------|
| Diesel                 | 10                 | 600             | 980             |
| Surrogate Recovery (%) |                    | 120             | 55              |

Results expressed as mg/kg unless otherwise noted.

Department of Environmental Quality  
**RECEIVED**  
APR 21 1992  
UST Compliance Section

**COFFEY LABORATORIES, INC.**

12423 N.E. Whitaker Way • Portland, OR • 97230 • (503) 254-1794 • FAX (503) 254-1452



PIF

P

NWR

RECEIVED

OCT 1 1991

NORTHWEST REGION

see attached phone msg. gen

Oregon Department of Environmental Quality

NOTICE OF UNDERGROUND STORAGE TANK PERMANENT DECOMMISSIONING/SERVICE CHANGE

FACILITY (Location of Tanks)

Name: RS6 Forest Products

Address: P.O. Box 169  
MOLALLA, OR 97038

Phone: 829-7200

DEQ Facility I.D. Number: 4625

Work To Be Performed By: Unknown at this time  
(Owner or Licensed Service Provider)

Phone: \_\_\_\_\_

TANK OWNER

Name: Same

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

Mobile Phone: \_\_\_\_\_

FORM MUST BE SUBMITTED BY UST OWNER OR OPERATOR 30 DAYS BEFORE START OF WORK

YOU MUST CONTACT YOUR LOCAL DEQ REGIONAL OFFICE 3-DAYS BEFORE STARTING ANY DECOMMISSIONING WORK. (Phone numbers are listed on reverse)

Will tank removal or potential cleanup affect adjacent property or Right-of-Way property? Yes \_\_\_\_\_ No X

Date decommissioning is scheduled to begin: 10-25-91

| Tank #   | DEQ UST Permit                     | Tank Size in (Gallons) | Product: Gasoline, Diesel, Used Oil, Other? |               | Closure or Service Change? |                              |                          | Tank to be Replaced? |    |
|----------|------------------------------------|------------------------|---------------------------------------------|---------------|----------------------------|------------------------------|--------------------------|----------------------|----|
|          |                                    |                        | Present                                     | New           | Tank Removal               | Closure <sup>∞</sup> Inplace | New <sup>∞</sup> Product | Yes*                 | No |
| <u>3</u> | <u>UST90-02846</u><br><u>AKRAD</u> | <u>10,000</u>          | <u>Diesel</u>                               | <u>Diesel</u> | <u>Closure</u>             |                              |                          | <u>X</u>             |    |
|          |                                    |                        |                                             |               |                            |                              |                          |                      |    |
|          |                                    |                        |                                             |               |                            |                              |                          |                      |    |
|          |                                    |                        |                                             |               |                            |                              |                          |                      |    |
|          |                                    |                        |                                             |               |                            |                              |                          |                      |    |
|          |                                    |                        |                                             |               |                            |                              |                          |                      |    |

\* If decommissioned tank(s) are to be replaced by new underground storage tanks you must submit a new permit application containing information on the new tanks 30 days before placing them in service.

∞ Submit a soil sampling plan to the DEQ regional office and receive plan approval prior to starting work if 1) tank is to be decommissioned in-place, 2) tank contents are changed to a non-regulated substance, or 3) tank contains a regulated substance other than petroleum.

Signature: Mark Reeves  
(Owner or Operator)

Date: 9-23-91

Department of Environmental Quality

RECEIVED  
SEP 25 1991

UST Compliance Section



Date: 9/30/91

NWk  
Oregon

Facility ID No.: 4625

Dear Tank Owner/Permittee:

DEPARTMENT OF  
ENVIRONMENTAL  
QUALITY

We received a decommissioning notice on 9/25/91  
for 1 underground storage tank(s) located at:

RSG Forest Products  
Hwy 213 P.O. Box 169  
Molalla, OR 97038

The following marked paragraphs apply to this situation:

✓  
Checking our records, it appears the tanks are registered, permit fees are current, and the contractor is licensed. You are required to confirm the date of removal with the appropriate regional office (see other side) at least 72 hours prior to tank removal.

✓  
New tank(s) to be installed. Permits for the new tank(s) must be obtained and permit fees paid prior to installation. An application is enclosed. Contact the UST Compliance Section at (503) 229-5733 for more permit applications or installation information. Once the permit has been issued, you may proceed with installation. You are required to confirm the date of installation with the appropriate regional office (see other side) at least 72 hours in advance.

There are apparently some discrepancies between our records and the information on your decommissioning form. The following concerns must be resolved BEFORE decommissioning can proceed:

\_\_\_ Inadequate information to identify tanks.

\_\_\_ One or more of the tanks are not permitted.

\_\_\_ Permit fees for 1988 1989 1990 1991 are past due.

✓  
The contractor you have identified is not licensed or you did not identify a contractor. Please note that a DEQ-licensed contractor is required when work is done by anyone other than the tank owner.

Please contact the UST Compliance Section at (503) 229-5733 to provide them with the additional tank identification information, to obtain details on which tanks need to be permitted and permit application forms, to arrange payment of fees (\$25 per tank per year), and/or to receive a list of licensed contractors.



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





UST - 3 DAY NOTICE

X REMOVAL \* 30 Day Notice? (Y) N  
 \_\_\_\_\_ INSTALL \* Permit Application Completed? Y N

Date: 2-18-92 Time: 8:30am Expected Activity Date: 2-20-92

Facility Name: LSC Forest Products Inc.

Address: 28890 Hwy 213

Molalla 97038 Phone: 829-7200

Facility ID #: unknown 4625 *Notice recvd in computer.*

Service Provider: Jeff Typeling

Estacada Phone: 630-3674

*SP/ Decom 11028*

License #: unknown *(Matrix Cleanup Super)  
(No Decom Super)*

| Tank I.D. #             | No. of Tanks | Size of Tanks | Contents of Tank |
|-------------------------|--------------|---------------|------------------|
| <i>AKED (3) unknown</i> | <u>1</u>     | <u>10,000</u> | <u>Diesel</u>    |
|                         |              |               |                  |
|                         |              |               |                  |
|                         |              |               |                  |
|                         |              |               |                  |
|                         |              |               |                  |
|                         |              |               |                  |

*Karen Kosnik*



TELEPHONE USE REPORT

CALL FROM/TO: Mark Reeves  
 COMPANY/TITLE: RSG Forest Prod's  
 PHONE NO.: 829-7200  
 CITY: \_\_\_\_\_ COUNTY: \_\_\_\_\_

DATE: 2-18-92

TIME: 1450

(Circle for filing)

AQ Asbestos

WQ (UST) OSS

SW HW

General Spill

SUMMARY OF CALL:

Notified him that Jeff Tyseling is a licensed decom. service provider, but not a supervisor, and that a supervisor must be present during certain junctures of decom. process.

Asked that he call me if the date of decom. will change because DEO will plan inspection.

2/20/92 8:05 am

Mark said Jeff is out there with a supervisor; will get back to me with the name.

2/21/92 935 - Frank McElhern  
 #10837

Signature

They found contamination and are waiting for lab results. Told him if there will be a delay beyond 72 hr. req. for serv. prov., call it in.



May 19, 1992

MARK REEVES  
RSG FOREST PRODUCTS  
PO BOX 169  
MOLALLA OREGON 97038

Re: RSG Forest Products  
File No. 03-92-138

Dear Mr. Reeves:

As required by Oregon Administrative Rules (OAR), on May 15, 1992, a release was reported from an underground storage tank (UST) system at your facility located at 28890 Highway 213 in Molalla, Oregon. As the responsible party for the facility, you are required to clean up the release according to OAR 340-122-201 through 340-122-360, "Cleanup Rules for Leaking Petroleum UST Systems and Numeric Soil Cleanup Levels for Motor Fuel and Heating Oil". A copy of these rules is enclosed.

The following is an outline of the reporting process required by the Northwest Region, Department of Environmental Quality:

1. If the cleanup is to be completed within 45 days of identifying the release, a single, final report can be submitted within 30 days of cleanup completion. This will satisfy the documentation requirements, provided you meet the provisions of OAR 340-122-360.
2. If cleanup cannot be completed within 45 days, submittal of an initial status report is required within 45 days of reporting the release. The report must summarize the findings to-date, outline your planned actions, and include anticipated dates of completion for each action. Additional interim reports may also be required depending on individual circumstances. A final report will be required within 30 days of completion of the project.

**Please read the enclosed rules carefully.** Note that one of the first things you must do is determine the scope of the problem in order to select the best method of remediation. The enclosed information will give you the guidance necessary to meet the specific documentation requirements for your site. As the owner, you should be aware of the regulations, even if you have hired a qualified consultant to do the actual work.



1500 SW First Avenue  
Suite 750  
Portland, OR 97201-5884  
(503) 229-5263  
DEQ-1





Page 2

Please keep the Department up-to-date on activities at the site. This will help to expedite cleanup and closure of the site. **File No. 03-92-137** has been assigned to this project. Please reference this number in all future correspondence.

Removing contaminated soils to the matrix cleanup levels is only one of many options that you may wish to consider for your site. You may find the services of a qualified consultant helpful in evaluating different cleanup options. Cleanup options other than removal to matrix standards require that a Corrective Action Plan (CAP) be submitted to the Department for approval. If a CAP is appropriate for your site, additional information about this process may be obtained from the region.

The Department is required to recover costs from the responsible party for oversight of CAP cleanups. You will be notified if the Department determines that cost recovery will be implemented for your site. For general information about the cost recovery process, please contact the UST Cleanup Program at (503) 229-6635.

Thank you for your cooperation and continued efforts to comply with the regulations. If you have any questions, please contact the Northwest Region at (503) 229-5263.

Sincerely,

UST CLEANUP SECTION  
Northwest Region

enclosure

cc: UST Cleanup Section, ECD