



**CREEKSIDE ENVIRONMENTAL  
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June 21, 2021

Oregon Department of Environmental Quality  
Attn: Kevin Dana, Project Manager, Cleanup Program, Northwest Region  
700 NE Multnomah Boulevard, Suite 600, Portland, Oregon 97232

RE: Annual Cap Inspection  
Troh Legacy Landfill (ECSI No. 5257)

Mr. Kevin Dana,

Creekside Environmental Consulting (Creekside) presents this annual soil cap inspection report for the Troh Legacy Landfill, performed in accordance with the Remedial Design/Remedial Action (RD/RA) for the subject site located at 10010 SE Vradenburg Road, in the City of Happy Valley<sup>1</sup>. EVREN Northwest, Inc. (ENW) assisted Creekside with this inspection.

The cap was inspected on June 17, 2021, by Creekside/ENW. No cap infringements were noted. During this reporting period, no requests for projects that would breach the cap were submitted to Holt Homes management; therefore, the soil cap was not disturbed by construction or other site activities. Signs were confirmed present around the perimeter of the cap covering the legacy landfill cell.

ENW will administer the annual CAP training with Holt Group/Holt Homes later this summer, at which time we will review the management objectives of the cap and provide instruction to be aware of any disturbances and to inform Creekside anytime there is a breach of the cap, or any planned activities that would breach the soil cap.

Please consider this letter and enclosed attachments the annual report for the calendar year July 2020 – August 2021.

Sincerely,

Lynn D. Green, C.E.G.  
Principal Engineering Geologist

ENCLs:

1. Photographic Log
2. Inspection Forms

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<sup>1</sup> Formally described as the "Eastern part of Tax Lot 401 of the East Scouters Mountain Development."

## PHOTOGRAPHIC LOG



View south across landfill cap showing summer season grass cover to provide stability of slope conditions.



View south showing toe of the landfill. Due to steepness, the toe of the landfill is capped by riprap.



View north at north buttress fill slope.



Closer view of landfill toe cap showing riprap with large logs at the toe.



**Former Troh Legacy Landfill**  
10010 SE Vradenburg Rd  
Happy Valley, Oregon

## Site Photographs

Project No.  
351-14002-10

Attachment  
**A**



Toe of rip rap slope, looking south.



View of signage at top of south access road, looking east.



**Former Troh Legacy Landfill**  
10010 SE Vradenburg Rd  
Happy Valley, Oregon

## Site Photographs

Project No.  
351-14002-10

Attachment  
**A**

## INSPECTION FORMS

# Soil Cap Annual Inspection Form

Date of Inspection: 6/17/2021  
Inspected by: Erik Chapman, RG

Maintaining the soil cap integrity and security **protects individuals** from exposure to landfill debris and contaminated soil beneath the site and is an ongoing responsibility. At a minimum, the soil cap will be inspected annually. Such inspections include monitoring cap thickness, erosion and vegetation establishment. More frequent inspections are encouraged and should also be documented with this form.

Persons performing the inspection must have a thorough understanding of the engineered soil cap and the Soil Cap Management plan.

## LANDFILL SOIL CAP

Evaluate all areas for erosion, wildlife disturbance, any unauthorized human activity that is breaching (penetrating) the soil cap and vegetation establishment. At least 12 inches of clean soil must be maintained over the original impacted soil.

**Is any unauthorized digging occurring? NO**

*If yes, immediately take steps to secure the area and manage the breach according to the Soil Cap Management or Contaminated Media Management Plan, as appropriate.*

**Are any natural elements (e.g., wind, rain, surface water, etc.) disturbing topsoil? NO**

**Are there any signs of wildlife (e.g., gophers, deer, dogs, etc.) disturbing topsoil? NO**

**Are there any potential conditions that may disturb topsoil / breach the cap? NO**

**Are any solid waste or debris exposed at the land surface? NO**

**Has vegetation been established on the cap and is there adequate vegetative cover to minimize erosion during storm events? YES**

**Has the cap thickness been maintained to be at a minimum three (3) feet thick in all areas of the soil cap? YES** Thickness has been confirmed through comparison of the as-built surveyed elevations at 5 selected points on the cap surface to the surface elevations at those selected points at the time of the inspection as determined through GPS, a rod and level survey or equivalent).

*If the answer is yes to any of these question, please document the conditions by 1) taking photographs, 2) showing location on a map, 3) describing condition and the measures taken to remedy the situation. Documentation should be kept with this form and submitted with the Annual Report.*

ACTION OR ADDITIONAL DOCUMENTATION REQUIRED?

NO

SIGNATURE OF PERSON PERFORMING INSPECTION:

*Erik Chapman*

# Annual Signage Review Form

For Year: 2021

Maintaining the soil cap integrity and security **to protect individuals** from exposure to impacted soil beneath the site is an ongoing responsibility. To ensure continued compliance with ODEQ requirements, the signage plan will be reviewed annually for effectiveness and signs will be verified present and in good. This form documents signage compliance and is to be submitted with the Annual Report to ODEQ.

ODEQ requires signs be posted regarding the soil cap. The Property Manager or their designee will work to determine the best locations for signs to be placed. A signage plan (list or map of sign locations and wording) will be developed and kept on file.

## ANNUAL SIGNAGE REVIEW AND INSPECTION

Please consider the effectiveness of the signage plan during this review and implement changes as necessary. Please explain any yes answers in the spaces provided below, or attach additional pages/supporting documentation as necessary.

**Person conducting review (name, position):** Erik Chapman, R.G.

Geologist for Creekside Environmental

**Have there been any unauthorized breaches of the soil cap in the last year? NO**

**If yes, could a change in signage have prevented this breach?**

*If yes, describe and implement changes to the signage plan.*

**Are signs still present and visible at all locations? YES**

**Do any of the signs need repair? NO**

**Are there any locations that signs should be added? NO**

**Are there any other reasons to modify the signage plan? NO**

Please modify signage plan according to need identified during this review and implement any changes in a timely manner.

ACTION OR ADDITIONAL DOCUMENTATION REQUIRED? NO

SIGNATURE OF PERSON PERFORMING INSPECTION:

*Erik Chapman* 6/17/2021

# WORK LOG

## For Any Breach of Soil Cap

For Year: 2021

Maintaining the soil cap integrity and security **to protect individuals** from exposure to landfill debris and contaminated soil beneath the site is an ongoing responsibility. ODEQ requires a log of all work conducted that penetrates the soil cap. This form is to be submitted with the Annual Report to ODEQ. Make copies as necessary.

<b>Responsible Party (Name, Position, Company):</b>	Start Date:	End Date:
Has a subsurface work documentation form been completed?		
Please describe Scope of Work and reason for need to breach soil cap. Details and supporting documentation should be submitted with separate Subsurface Work Documentation form.		
<h1 style="color: red; margin: 0;">NO WORK</h1>		
Was any impacted soil excavated? If yes, briefly describe method of management and disposal.		
<h1 style="color: red; margin: 0;">COMPLETED IN 2021</h1>		
Describe precautions taken to prevent individuals from being exposed to hazardous constituents in soil		
<b>Responsible Party (Name, Position, Company):</b>	Start Date:	End Date:
Has a subsurface work documentation form been completed?		
Please describe Scope of Work and reason for need to breach soil cap. Details and supporting documentation should be submitted with separate Subsurface Work Documentation form.		
Was any impacted soil excavated? If yes, briefly describe method of management and disposal.		
Describe precautions taken to prevent individuals from being exposed to excavated soils		

# Subsurface Work Documentation Form

Name of Project: \_\_\_\_\_

This form is to be completed by any personnel, contractor or utility performing work that will penetrate the soil cap. Work is not to be conducted unless the criteria described below are met and the Property Manager (or designee) has approved the work.

## PROJECT INITIATION

Responsible Party (Name, Position, Company):	Requested Work Start Date:
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**CERTIFICATION:** I have read the Soil Cap Management plan (Plan) and I understand its importance for protecting the soil cap. I agree to abide by these measures and safety rules and all applicable safety regulations while working on the property. *FURTHER, I take responsibility for training all field personnel for this project on the requirements of this Plan.* I understand that any violation of these rules will result in my removal from the work area.

**Signature of Responsible Party Listed Above:**

**Please describe proposed work, any anticipated excavation of impacted soil, proposed methods of management and disposal, proposed methods of replacing soil cap at work completion.**

**NO WORK COMPLETED  
IN 2021**

## PROJECT APPROVAL

Person Approving Proposed Work (Name, Position, Company):	Date of Approval:
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**CERTIFICATION:** I have a thorough understanding of the Soil Cap Management plan (Plan). The proposed work methods meet the requirements of the Plan and I grant approval for the work to be conducted as described.

**Signature of Approving Party:**

Designated personnel to contact in case of change in scope or questions regarding Plan:	Phone Number:
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# Subsurface Work Documentation Form

Name of Project: \_\_\_\_\_

Complete the following information upon project completion. Please attach appropriate supporting documentation including, but not limited to, field work photographs, and a map showing location and extent of work.

Responsible Party (Name, Position, Company):	Start Date:	End Date:
<b>Detailed Description of Work:</b>  <h1 style="text-align: center; color: red;">NO WORK COMPLETED IN 2021</h1>		
<b>Was any landfill debris / contaminated soil from below the soil cap excavated? Y / N</b>  If yes, <u>please provide supporting documentation</u> and describe in detail the methods used to manage any impacted soils onsite and method(s) of disposal. <b><u>Waste receipts must be provided.</u></b>		
Describe precautions taken to prevent individuals from being exposed to impacted soils.		
Describe method of replacing soil cap at work completion.		
<b>Signature of Responsible Party Listed Above:</b>		