



**CREEKSIDE ENVIRONMENTAL
CONSULTING, LLC**

40 SE 24TH AVENUE, SUITE A
PORTLAND, OREGON 97214
T. 503-6952-8118
BRENT@CREEKSIDEENVIRONMENTAL.COM



EVREN NORTHWEST, INC.
environmental / natural resource consultants

Main offices P.O. Box 14488, Portland, Oregon 97293
Satellite Offices: Bend, Oregon and San Rafael, California
T. 503-452-5561 / E. ENW@EVREN-NW.com

August 18, 2023

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

RE: 2023 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 Valley¹. EVREN Northwest, Inc. (ENW) assisted Creekside with this inspection.

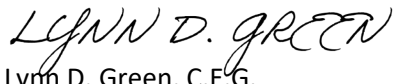
The cap was inspected on August 16, 2023, by Creekside/ENW. No cap infringements were noted. During this reporting period, no requests for projects that would breach the cap were submitted to Holt Homes management; therefore, the soil cap was not disturbed by construction or other site activities. Signs were confirmed present around the perimeter of the cap covering the legacy landfill cell.

ENW administered the annual CAP training with Holt Group/Holt Homes on August 17, 2023, which included a review of 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. During the training, Holt Homes provided the landscaping plan for the Troh Landfill site and surrounding area, which involves import of new soil to increase the cap thickness in areas, and planting of grass and trees. Soil will be derived from scrapings from other phases of development in the immediate area, in preparation for developing these areas with new homes. The soil is planned to be imported and grass planted in the Spring of 2024. Once ENW have more information on the scope of cap augmentation work and confirm the source of this additional capping soil along with any characterization testing, as applicable, ENW will share this plan with ODEQ.

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

Please consider this letter and enclosed attachments the annual report for the calendar year 2022.

Sincerely,

A handwritten signature in black ink that reads "LYNN D. GREEN". The signature is written in a cursive, slightly slanted style.

Lynn D. Green, C.E.G.

Principal Engineering Geologist

ENCLs:

1. Photographic Log
2. Inspection Forms

PHOTOGRAPHIC LOG



Signs warning of no unauthorized digging were posted as required.



View south across landfill cap showing summer season grass cover stabilizing slope conditions.



View north at north buttress fill slope. Survey stake marks south edge of landfill.



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



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

Site Photographs

Project No.
351-14002-10
Attachment

A



View east showing access road from the former south truck entrance and south buttress slope.



Toe of rip rap slope, looking south.



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

INSPECTION FORMS

For Year: 2023

ANNUAL PERSONNEL TRAINING

8/18/23

[illegible]

Soil Cap Annual Inspection Form

Date of Inspection: 8/16/2023
Inspected by: Erik Chapman, R.G.

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

8/16/23

Annual Signage Review Form

For Year: 2023

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? Y / N

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

8/16/23