

To:	Kevin Dana Cleanup Project Manager Oregon DEQ, Northwest Region	From:	Robert McAlister, RG Associate Geologist Stantec Consulting Services Inc.
Project/File:	227704604	Date:	November 12, 2024

**Reference: Rock Creek Reconnaissance Work Plan
 Oregon Plastic Tubing Facility
 6401 and 6402 South Miller Road, Hubbard, Oregon
 ECSI Site #6521, LUST #03-22-0412**

Mr. Dana,

Stantec Consulting Services Inc. (Stantec) has prepared this memorandum for the visual assessment of Rock Creek adjacent to the Oregon Plastic Tubing and Pacific Corrugated Facility at 6401 and 6402 South Miller Road in Hubbard, Oregon (Subject Property) on behalf of Prinsco Water Management Solutions (Prinsco). The scope of work is based on correspondence dated June 5, 2024 from the Oregon Department of Environmental Quality (DEQ) requesting an evaluation of potential risks to Rock Creek.

Site Description

The Subject Property consists of 61.31 acres occupied by an office and shop building, pipe manufacturing building and canopied shed with pipe storage in the eastern and south-central portions of the Property. A hazelnut orchard is located on the north-western portion of the Property. Access to the Subject Property is from South Miller Road, which bisects the northern and southern portions of the Subject Property (**Figures 1 and 2**). A summary of environmental investigations completed at the Subject Property is included in Stantec's June 7, 2023 *Additional Assessment and Well Installation Report, Oregon Plastic Tubing and Pacific Corrugated Facility, 6401 and 6402 South Miller Road, Hubbard, Oregon*.

Contaminants of concern (COCs) detected in samples of environmental media collected from the Subject Property to date consist of petroleum hydrocarbons, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, benzene, ethylbenzene, naphthalene, and lead.

Purpose and Scope of Work

Rock Creek, a tributary of the lower Clackamas River, drains a watershed of approximately 6,278 acres and is utilized for industrial supply, irrigation and as a habitat for salmonids and other wildlife¹. The Subject Property is located adjacent to Rock Creek at the Miller Road bridge, approximately 4 river miles upstream from the confluence with the Pudding River. Rock Creek is identified by the National Wetlands Inventory as

¹ Clackamas River Basin Council (<https://clackamasriver.org/about-the-watershed/subwatersheds/rock-creek/>)

Reference: Oregon Plastic Tubing, ECSI Site #6521, LUST #03-22-0412

a Palustrine system, Forested class, Broad-Leafed Deciduous subclass with a Temporary Flooded water regime (**Attachment A**).

Stantec proposes completing a visual reconnaissance of Rock Creek adjacent to the Subject Property to assess and document any apparent impacts to the riparian environment as a result of petroleum contamination sourced from the Subject Property. Reconnaissance will consist of physically accessing Rock Creek from the Subject Property and completing several transects parallel and perpendicular to Rock Creek for a distance of approximately 1,000-feet both up-stream and down-stream of the Subject Property to visually assess for the following:

- Evidence of petroleum-impacted groundwater seepage from soil slopes in the creek valley;
- Distressed vegetation;
- Petroleum sheen on surface water; and/or
- Olfactory evidence of petroleum impact.

A memorandum summarizing the reconnaissance observations will be submitted to the DEQ including a photographic log.

The field assessment will be completed upon DEQ approval of the work plan.

Regards,

STANTEC CONSULTING SERVICES INC.



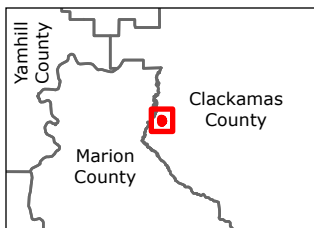
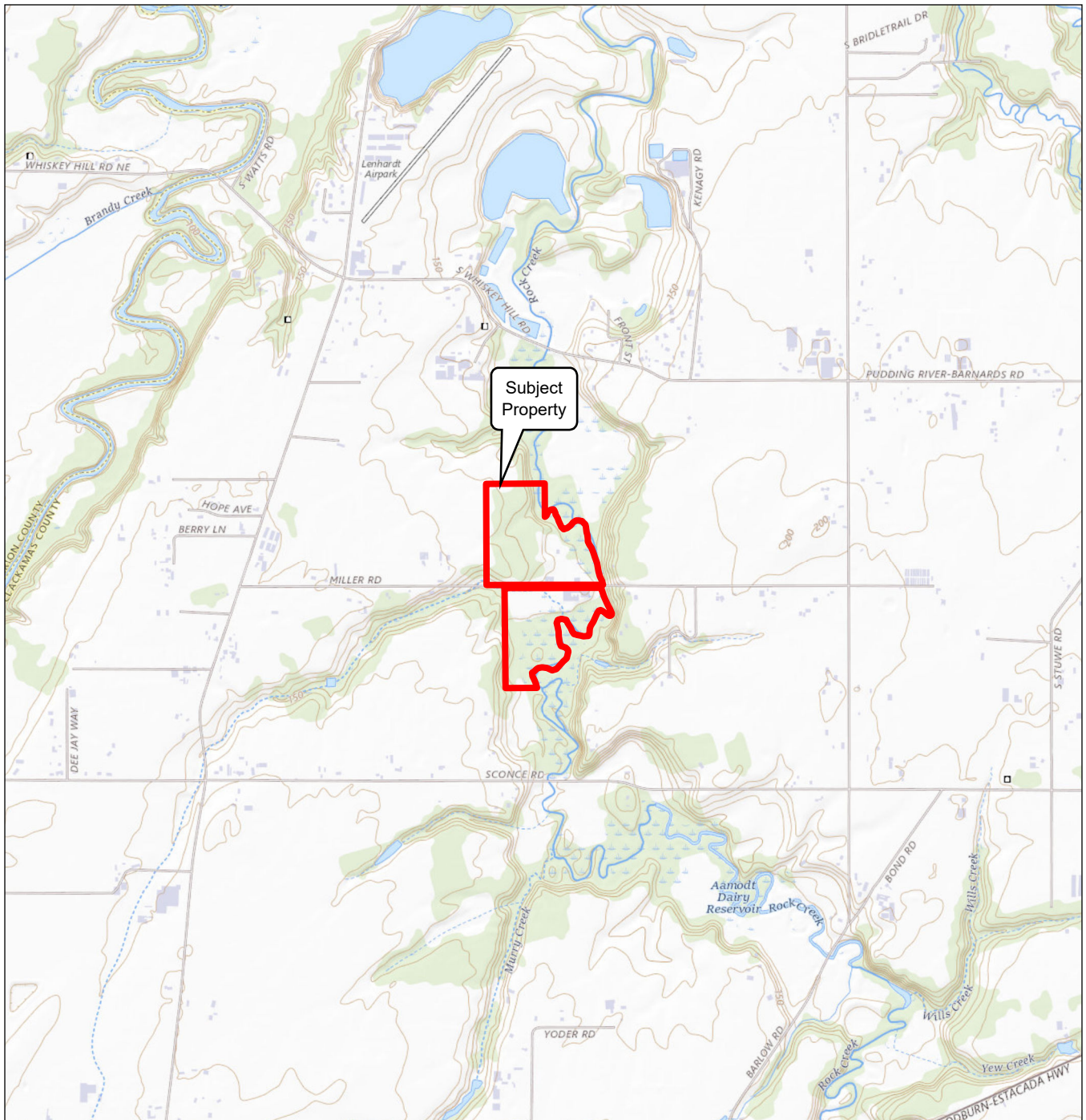
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bob.mcalister@stantec.com

Attachments: Figure 1 – Site Location Map

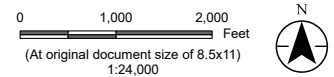
Figure 2 – Site Detail Map

Figure 3 – Site Plan

Attachment A – Wetlands Inventories Maps



Legend
 Subject Property



Project Location
6401 and 6402 South Miller Road,
Hubbard, OR

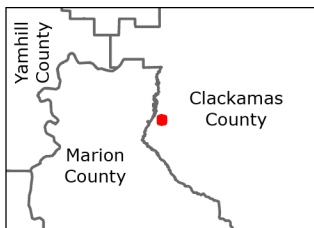
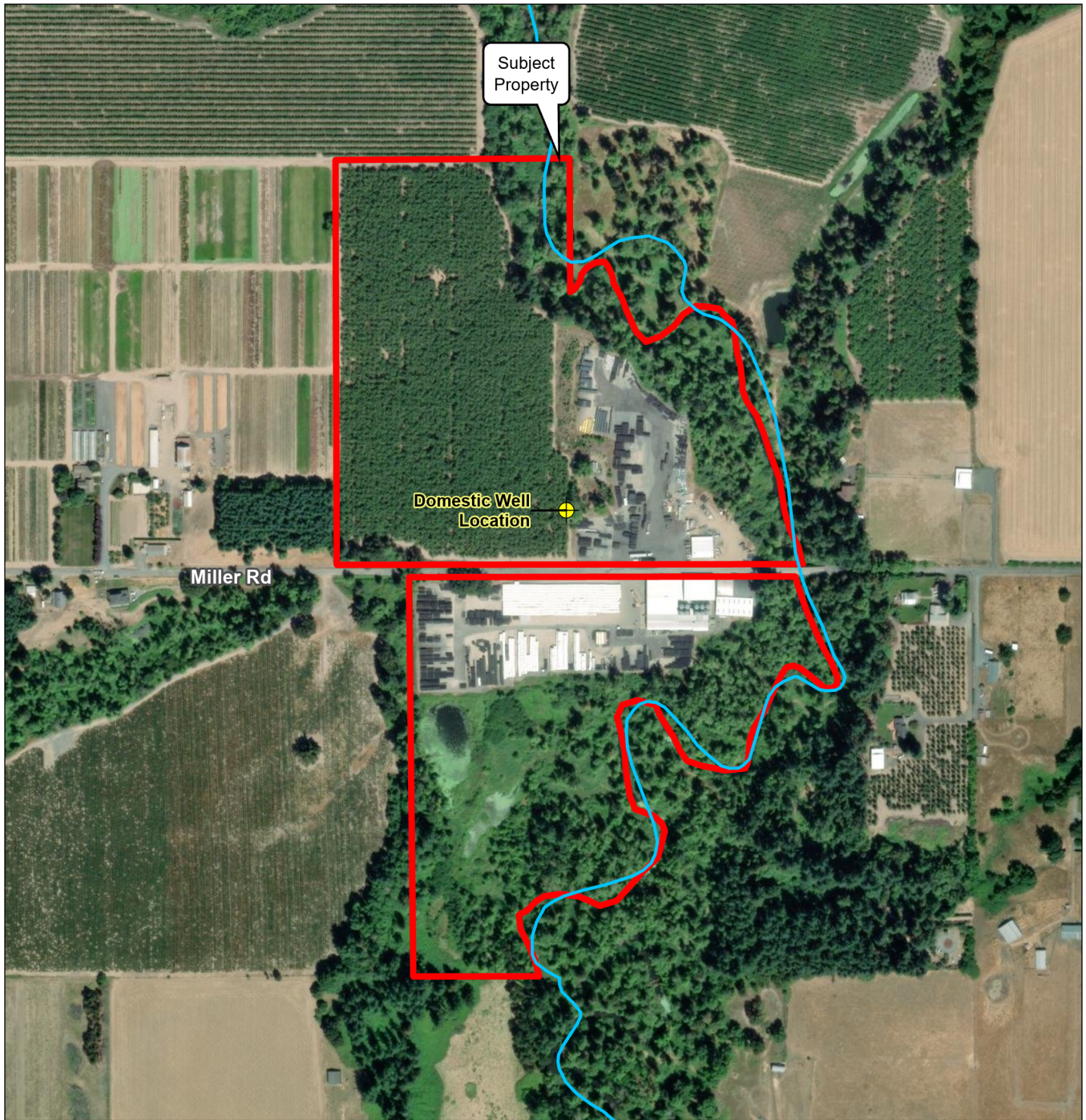
Prepared by BS on 2023-06-02
TR by RWM on 2020-05-23
IR by ES on 2020-05-23

Client/Project
Oregon Plastic Tubing and
Pacific Corrugated Company
Additional Assessment Report

227704604

Notes
1. Coordinate System: NAD 1983 UTM Zone 10N
2. Data Sources: USGS, Clackamas County Parcels
3. Background: USGS 7.5 Minute Quadrangle

Figure No.
1
Title
Site Location Map



- Legend**
- ▮ Subject Property
 - Rock Creek
 - Domestic Well Location

0 250 500 Feet
(At original document size of 8.5x11)
1:6,000



Project Location
6401 and 6402 South Miller Road,
Hubbard, OR

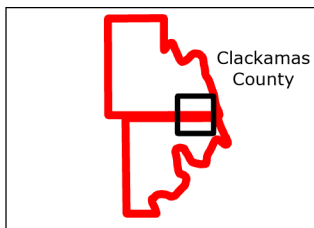
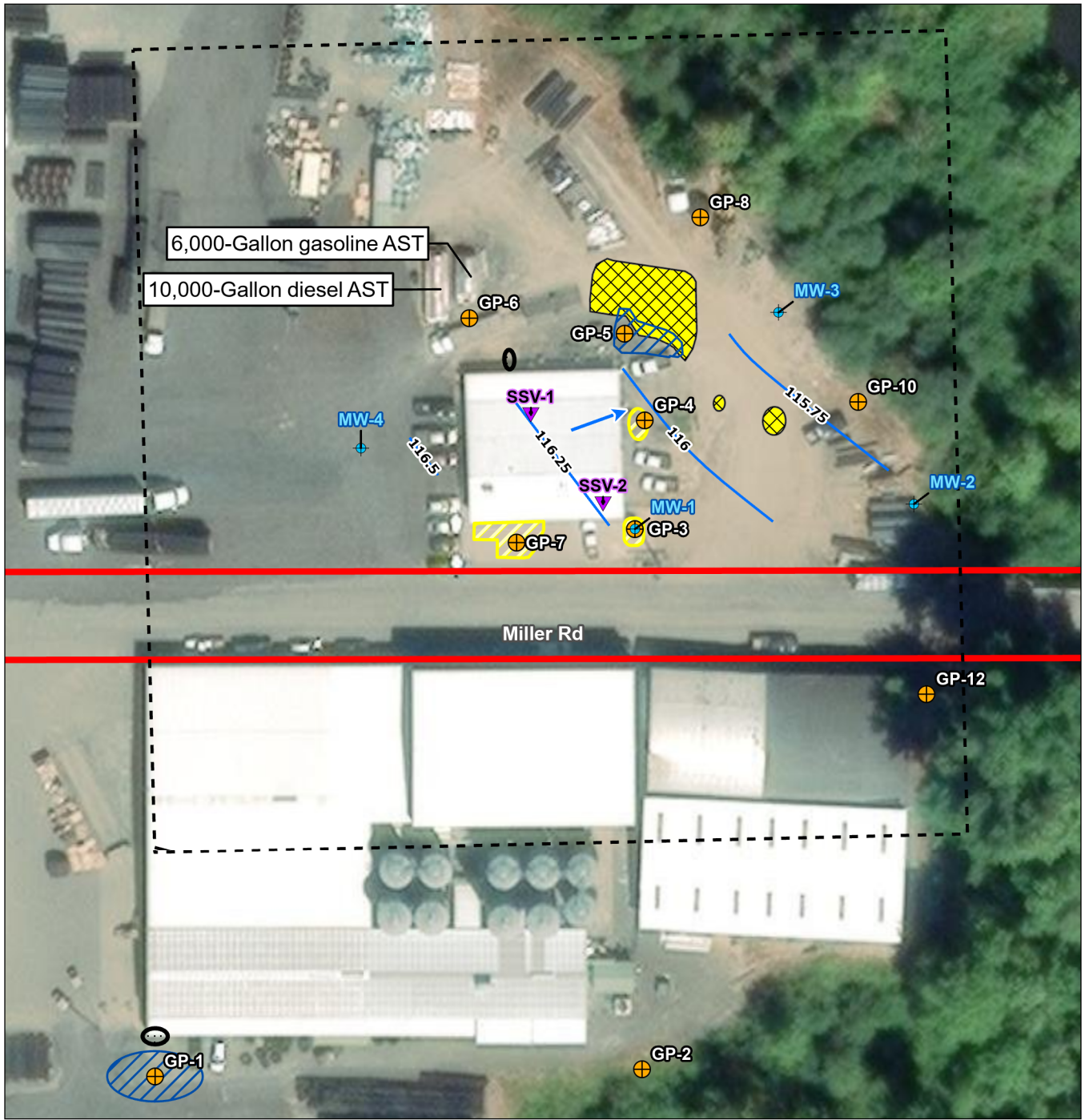
Prepared by BS on 2024-10-24
TR by RWM on 2020-05-23
IR by ES on 2020-05-23

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Figure No.
2

Title
Site Detail Map



- Legend**
- Subject Property
 - Backfilled Excavations
 - Ferric
 - Non-Ferric
 - Locality of Facility
 - Drain Field
 - Septic Tank
 - Groundwater Flow
 - Groundwater Contour (ft)
 - + Groundwater Monitoring Well Locations
 - ▼ Soil Vapor Sample Locations
 - + Borehole Locations

0 35 70 Feet
(At original document size of 8.5x11)
1:840



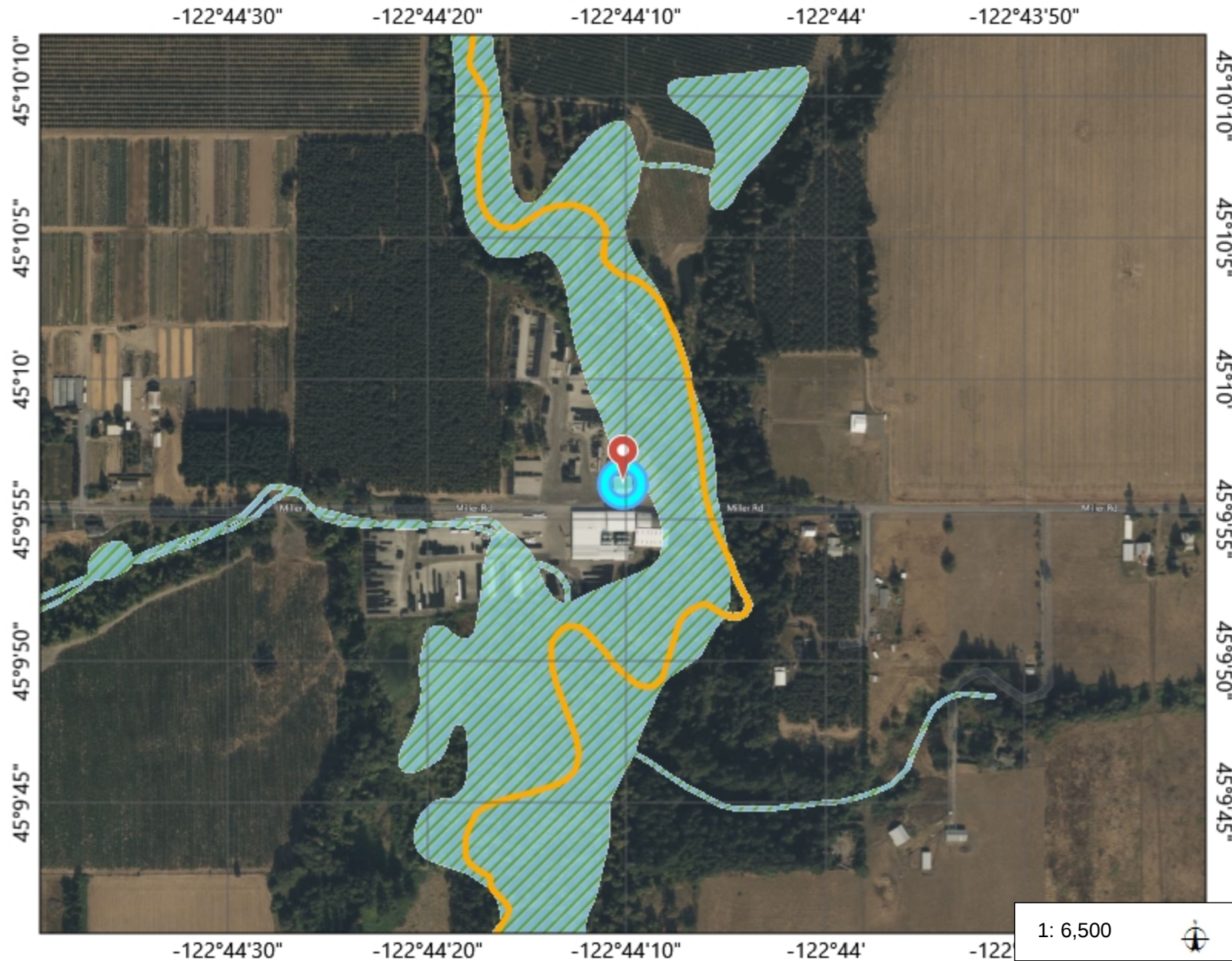
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Figure No.
3

Title
Site Plan



Legend

-  County Boundaries (2015)
-  Essential Salmonid Habitat
-  National Wetland Inventory (2020)
- Dark Gray Canvas Reference
- Dark Gray Canvas Base

Notes

0.2 0 0.10 0.2 Miles

WGS_1984_Web_Mercator_Auxiliary_Sphere
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THIS MAP IS NOT TO BE USED FOR NAVIGATION.



U.S. Fish and Wildlife Service

National Wetlands Inventory

Oregon Plastic Tubing NWI figure



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

October 23, 2024

Wetlands

	Estuarine and Marine Deepwater		Freshwater Emergent Wetland		Lake
	Estuarine and Marine Wetland		Freshwater Forested/Shrub Wetland		Other
			Freshwater Pond		Riverine

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