Memorandum

To: Nancy Sawka, Oregon Department of Environmental Quality

Date: July 12, 2024

From: Jessica Glenn and Cody Schweitzer, Maul Foster & Alongi, Inc.

Project No.: M0022.01.046

Re: Soil Management Plan: Project Description for Manhole Repair

On behalf of Stella-Jones Corporation (Stella-Jones), Maul Foster & Alongi (MFA) has prepared this soil management plan (SMP) for the facility located at 22125 SW Rock Creek Road in Sheridan, Oregon (the Site). This document describes how soils will be managed as part of a manhole repair. This information is being provided to the Oregon Department of Environmental Quality (DEQ) as required under the May 2014 Soil Management Plan Procedures (SMPP) for the Site.

As required by the SMPP, this project description outlines soil management and assessment procedures for DEQ review and approval. Stella-Jones and MFA understand DEQ approval is required prior to any excavation activities on site. This memorandum includes the following information, as required by the SMPP:

- Description of proposed excavation activities
- Field activities (sampling locations, sample methodology, chemical analysis)
- Soil characterization process

This information is primarily detailed in the SMPP but is summarized in this memorandum in the context of the proposed site activities.

Proposed Excavation Activities

Stella Jones plans to repair the manhole located in the southern part of the Site (Figure 1). The manhole repair involves removing and replacing the broken concrete surrounding the existing manhole and setting a new manhole at surface level to decrease the chances of wear and tear over time.

Excavation is not intended during this repair, and it is anticipated that no soil waste will be generated or stockpiled. If soil waste is generated, characterization and on-site management will occur prior to the removal from the Site.

Figure 1: Location of manhole for repair.

Field Activities

If soil is generated, soil from excavation activities will be stockpiled nearby for use as backfill material. After installation is complete, the remaining soil will be stockpiled pending characterization for off-site disposal. Soil will be stockpiled under a rolling stock shed on 6 millimeter (mm) plastic sheeting, covered with 6 mm plastic sheeting, and weighted down with sandbags (or other equivalent method) to prevent any potential erosion and dust generation.

The stockpile soil will be sampled by collecting five random discrete samples that are then field composited into a single composite sample. Sample increments will be collected using a stainless-steel measuring cup to ensure a consistent volume of material is collected for each increment.

The samples will be combined into one laboratory-provided sample container and placed on ice. Samples will be submitted under chain-of-custody protocols to Apex Laboratories, LLC for ISM sample processing and chemical analysis.

Soil Characterization Process

To assess concentrations of hazardous constituents, as described in the SMPP for the Site, soil samples will be analyzed for total arsenic by EPA Method 6020B, dioxins by EPA Method 8290A, and pentachlorophenol by EPA Method 8270E. Results will be evaluated against excavation worker and occupational worker RBCs (soil ingestion, dermal contact, and inhalation). Based on the analytical results, MFA will follow the soil profile decision tree (Figure 1 of the SMPP) to identify a soil disposal pathway for DEQ approval.