

Matcon Annual Inspection Report for the Taylor Lumber Superfund Site
Stella Jones Company
22125 SW Rock Creek Road, Sheridan, Oregon
Construction date for cap: 2007

Inspection date: March 26, 2024

Present at inspection:

Nancy Sawka, DEQ WR Cleanup Program Project Manager

Nate Wakefield, DEQ WR Cleanup Program Intern

Roland Mueller, SJC Plant Manager

Holly Spencer, SJC Environmental Supervisor

Site use

Site is a wood treating facility that formerly treated with pentachlorophenol (Penta) but recently has switched to using Dichlorooctylisothiazolinone (DCOIT). Cut lumber treating no longer takes place at the yard. Ancillary activities at the site include log off-loading, debarking, log storage, treated lumber and log storage and transport.

The current approved definition for evaluating MatCon cap damage requiring repair includes:

- Any damage that exceeds $\frac{3}{4}$ inch depth below the normal surface elevation and where gouging as indicated by rough edges is present, should be repaired.
- Smooth depressions are not considered to need repair unless they extend more than 1 inch below the normal surface elevation of the surrounding area.

1. Pre-briefing:

Normally a pre-briefing discussion is conducted in the facility conference room.

However, the conference room was not available, so de-briefing was conducted during the site walk/inspection. The main discussion points included:

- a. Recent Repairs: One area of the MatCon was repaired since the last inspection. The condensate discharge from a pipe adjacent to the evaporator created a hole in the MatCon. The condensate is usually collected in a bucket beneath the pipe, but the bucket had been removed allowing the condensate to come in contact with the MatCon (See Photo 1 and 2).
- b. General Cap Performance: Discussed the cap performance and service life with Jerry A. Thayer, PE, from MatCon Inc. and Dr. Geoffrey Rowe, PE/PhD, Abatech on 4/23/2024 at a subsequent site visit meeting. Both companies were involved in the original MatCon scoping, design and placement. The cap was installed in 2007 and is now approximately 17 years old. While inspecting the cap, Dr. Rowe indicated that the MatCon appeared in good condition, and he expected it to last another 5 to 10 years before requiring full or large-scale re-surfacing or replacement. Dr. Rowe also

pointed out several locations on the MatCon with numerous localized cracks or cracked seals (around drains) that should be re-surfaced and/or re-sealed as part of the routine maintenance (examples shown in Photo 3 and 4). There was also a large manhole cover near the peeler area that was observed to need MatCon repair and reconstruction to make it flush with the surrounding grade (Photo 5 and 6) .

- c. Barrier wall demarcation line was last painted in June of 2023. The facility continues to use a double coat, painting a second coat over existing demarcation lines to extend the life of the visible marking.
- d. Status of recent projects – DEQ recently provided approval (DEQ e-mail 4/2/2024) for SJC to proceed with the stormwater conveyance line repair project in the gravel area northeast of the retorts and partially in the area of the former August 2023 DCOIT spill. Based on e-mail correspondence with SJC’s consultant (Jessica Glenn of MFA, 3/15/2024), “All material contaminated by the spill was removed from that area of the site. The material currently in place is gravel that was imported following cleanup activities.” Given this, it is anticipated that the repair work will not involve any DCOIT contaminated material. (4/22/2024 e-mail update from Alex Clark of SJC indicated that visibly contaminated material was observed in the vicinity of the catch basin during the repair work and is likely related to the DCOIT spill. Alex will follow-up with a description/report and map showing the area overlaid with the release area. Further investigation/cleanup of this area may be warranted).
- e. Peeler Area – Roland discussed plans to continue asphaltting the peeler area to help prevent mud tracking to the MatCon. DEQ attended a meeting with the MatCon and asphalt contractors on 4/23/2024 to discuss the asphalt paving plan. The subject area already drains to the stormwater treatment system and is very compacted for use as heavy equipment traffic and material storage, so there is very minimal infiltration. Paving the area will serve to improve the quality of the stormwater from this area and should not impact the quantity.

2. Site Inspection – 3/26/2024

Nancy, Nate, Roland and Holly walked the perimeter and interior of the facility starting at the west towards the peeler.

- a. Eruption cracks and surface damage. Was difficult to observe/inspect due to the mud and dirt. Next inspection will be held during the drier part of the year sometime between August and October 2024.
- b. Cap margins and edges: Cap margins and edges were difficult to see due to the amount of mud and dirt tracking around the perimeter of the MatCon.

Inspecting during the drier fall months should improve visibility during the annual inspection moving forward.

- c. DEQ noted that contaminated water from the DCOIT spill cleanup was being stored in temporary frac tanks in an area south of the block dissolver and railcar shed. The tanks had temporary containment units beneath them. The unit on the eastern most tank was filled with rainwater and overflowing onto the MatCon and into a nearby catch basin. At the 4/23/2024 meeting, DEQ learned that the wastewater in the frac tanks was characterized and is being managed by Chemical Waste Management.
- d. Block dissolver unit – repairs were previously made to the MatCon in front of the unit entrance and a board was placed over the area where the material is unloaded to prevent further damage.
- e. Barrier wall demarcation: The yellow line demarcating the barrier wall was difficult to inspect around the entire site due to the mud and dirt accumulation. Where the line was visible near the peeler, it looked ok, but was starting to fade and wear out (see Photo 7).
- f. Standing Water – some small puddles of standing water on the MatCon were observed but appeared to be insignificant.
- g. Sweeping – Sweeping is completed routinely. Accumulation of mud, dirt and gravel on the MatCon is much more significant in the rainier fall to spring months, due to tracking from heavy equipment traffic. Increase in sweeping/cleaning should be considered during these times and/or other methods put in place to reduce the accumulation on the MatCon. Swept material is sampled and characterized for offsite disposal profile approval.
- h. Chemical Spills – Two spills occurred over the last two years. In November and December 2022 penta-containing process waste liquid was released to the ground and stormwater catch basins near the evaporator/WWTU. The material flowed to the stormwater treatment system, which was subsequently cleaned by a third party. In August 2023, about 25,000 gallons of DCOIT was released from a retort. Most was contained, but about 2,400 gallons overflowed onto the retort infeed tracks and gravel to the east and into the bathroom and possibly under the breakroom to the south. Cleanup and investigation of this spill in the gravel/track area has been addressed, but the breakroom area and groundwater beneath the area are still under investigation.
- i. Stormwater Treatment System – Violations of NPDES Penta, iron, and copper discharges at outfall 003 have occurred over the last few months. Since that

time, SJC's consultant has installed a temporary carbon unit which seems to be adequately removing the contaminants prior to discharge. SJC is still trying to determine why the previous carbon unit was failing and allowing Penta, iron and copper to breakthrough the system.

Corrective Actions Needed (to be addressed prior to next inspection, unless otherwise specified):

1. Accumulation of mud, dirt and gravel on the MatCon during the Fall/Winter is extensive. SJC has a plan to increase the paving under the peeling area to minimize the tracking of mud onto the Matcon from these currently unpaved areas. Any material that accumulates and is removed from the MatCon is sampled and characterized for routine offsite disposal.
2. SJC should follow-up on previous discussions about using a better, more durable paint for the demarcation line such as paint that is used by ODOT for roads, using a double or triple coat of paint, painting more frequently or finding a more permanent way to mark the barrier wall boundary.
3. The area around the evaporator's non-contact steam line's condensate drain had debris (dirt, mud?) accumulating. This area should be cleaned regularly.
4. The manhole in Photos 5 and 6 should be modified so that it is flush with the ground. This will help to prevent future damage from vehicle traffic over the area. The damaged and cracked concrete and MatCon around the manhole should be repaired and/or replaced during the manhole modifications.
5. Complete re-surfacing and/or re-sealing of the surfaces indicated by Dr. Rowe during the 4/23/2024 meeting.
6. Provide a plan and schedule for completing 4 and 5 above to DEQ prior to completing the work. This work should be completed prior to October 2024, or by another time proposed and agreed to by DEQ.
7. SJC should submit pavement paving plans to DEQ for review and approval prior to implementing the asphalt work in the peeler area. The plans should include characterizing and disposal of any soil/material removed from that area as part of the paving plan. Soil in that area could be contaminated with arsenic and possibly residual penta and/or dioxins and could require special disposal.

Inspector name: Nancy Sawka Signature: Nancy SAWKA Date: 5/3/24

SITE INSPECTION PHOTOGRAPHS



Photo 1:



Photo 2:

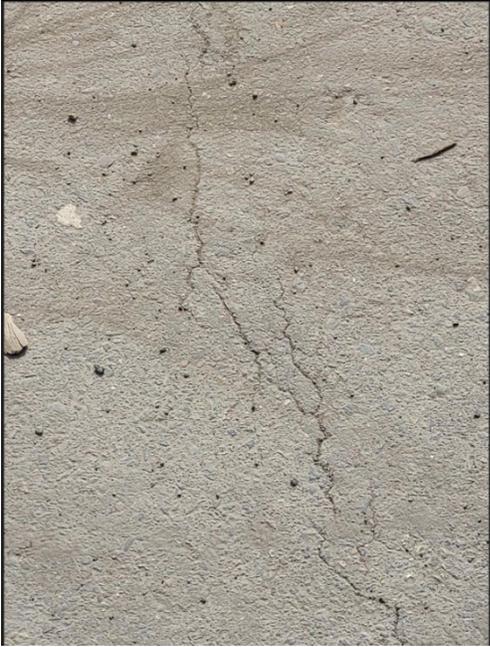


Photo 3



Photo 4



Photo 5

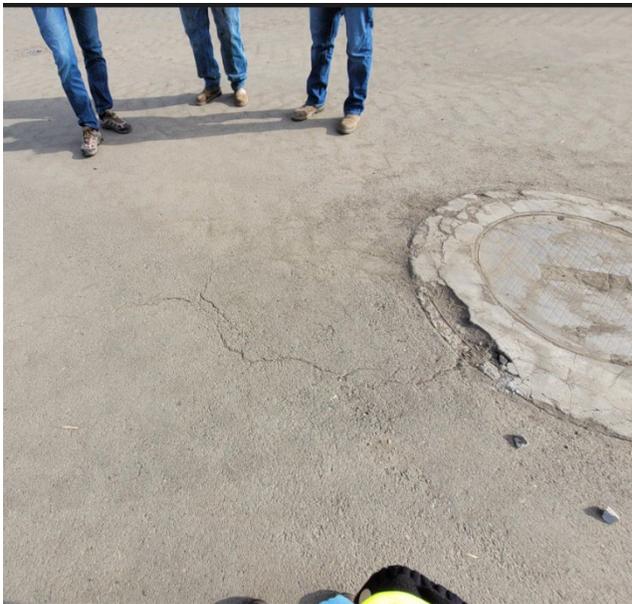


Photo 6



Photo 7



Photo 8