



Memorandum

To: Nancy Sawka, Oregon Department of Environmental Quality

Date: February 28, 2024

From: Jessica Glenn and Julianna Wetmore, Maul Foster & Alongi, Inc.

Project No.: M0022.01.039

Re: Soil Management Plan: Project Description for Conveyance Line Repair

On behalf of Stella-Jones Corporation (Stella-Jones), Maul Foster & Alongi (MFA) has prepared this memorandum detailing how excavated soils will be managed as part of a conveyance line repair at the facility located at 22125 SW Rock Creek Road in Sheridan, Oregon (the Site). 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 replace the stormwater conveyance line between two catch basins located in the central eastern portion of the Site (Figure 1). The conveyance will be an 18-inch diameter ductile iron pipe, approximately 96 feet long. Soil excavated as part of the installation will be used as backfill as much as feasible. However, Stella-Jones and MFA estimate approximately 10 to 20 cubic yards of material will ultimately require characterization and on-site management prior to removal from the Site.



Figure 1. Catch basin locations in northeast corner of the Site. Red arrow indicates location of pipe installation and direction of flow.

Field Activities

A trench will be excavated between the two catch basins indicated on Figure 1. Soil 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 contain the presumed contamination) to prevent any potential erosion and dust generation.

MFA proposes sampling the stockpiled soil using an incremental sampling methodology (ISM) approach. The SMPP outlines an approach of collecting random discrete samples that are then composited by the field staff into a single sample. However, current DEQ guidance is to use an ISM approach to collect a representative sample. The stockpile will be considered a single decision unit and the ISM sample will consist of 50 increments and one replicate sample will be collected.

Sample increments will be collected using a laboratory provided 2-ounce glass jar to ensure a consistent volume of material was collected for each increment. The sample increment locations will be selected using a systematic random sampling scheme in accordance with DEQ's Decision Unit Characterization guidance, to be determined in the field based on the dimensions and volume of the stockpile.¹ The increments 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 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

¹ DEQ. 2020. *Decision Unit Characterization*. Oregon Department of Environmental Quality. September 14.

pentachlorophenol by EPA Method 8270E and 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.