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.: M0022.01.045

Re: Soil Management Plan: Project Description for pole storage bunk upgrade

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 repairs and upgrades to the pole storage bunks. 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 and add additional uprights to existing bunks in the white pole storage and treated wood storage yards of the Site (Figure 1). A bunk is used for storage of poles and consists of vertical uprights (poles) bored approximately 6 to 10 feet into the ground on each corner (Images 1 and 2). There are also horizontal skids along the ground surface. The rear uprights will rise approximately 8 feet above ground surface, and the forward uprights will rise approximately 6 feet above ground surface.

Existing bunks were installed in 2015, and some vertical uprights need replacement. The replacement of the vertical uprights involves no excavation, so these bunks do not require soil management. This SMP is for excavation related to the addition of approximately 12 new bunk uprights (exact number to be determined), as shown on Figure 1.

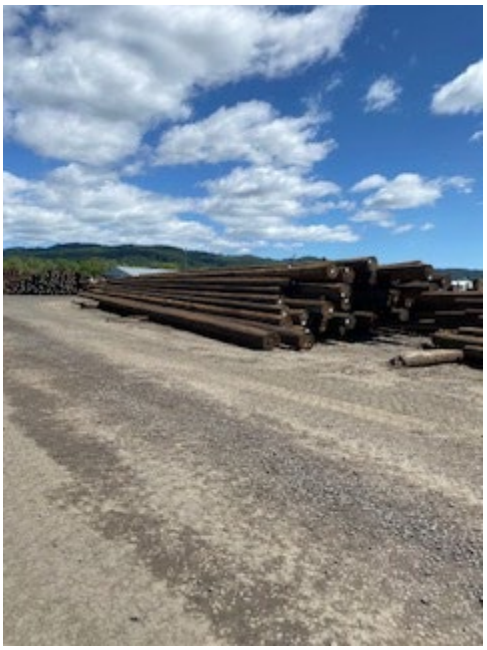

Image 1 – Bunk without uprights

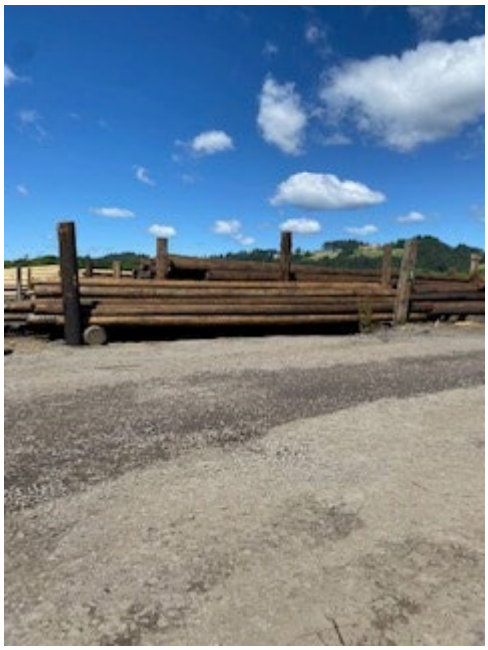

Image 2– Bunk with uprights

Figure 1: Anticipated bunk uprights installation locations.

Soil excavated during the installation of the new bunk uprights will be used as backfill as much as feasible. Stella-Jones and MFA estimate a minimal amount of material, less than approximately 10 cubic yards, will require characterization and on-site management prior to removal from the Site.

Field Activities

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.

Based on the amount of material generated, MFA proposes two alternatives for sampling the stockpiled material. If the stockpile is less than approximately 10 cubic yards, 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.

If the stockpile is greater than approximately 10 cubic yards, soil will be sampled using an incremental sampling methodology (ISM) approach following current DEQ guidance. [1] The stockpile will be considered a single decision unit and the ISM sample will consist of 50 increments. 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.

Sample increments will be collected using a laboratory provided 2-ounce glass jar to ensure a consistent volume of material is collected for each increment. The samples will be combined in 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.

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