



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.: M0022.01.044

Re: Soil Management Plan: Project Description for Peeler Paving Addition

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 excavation activities completed in preparation for paving in the peeler area. 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

In 2023, Stella-Jones paved a portion of the peeler area, located in the southern part of the Site (Figure 1). Stella-Jones plans to pave two additional areas around the peeler in 2024. The proposed paving areas are currently composed of crushed gravel and the addition of asphalt would allow for easier maintenance of the areas. To prepare for paving activities, approximately 6-inches of gravel needs to be removed across the approximately 31,400 square foot area. This will result in an estimated 580 cubic yards of excavated soil.



Figure 1. Peeler Area Paving

As previously discussed with DEQ, because of the volume of material that will be generated, MFA will characterize the soil prior to excavation using the incremental sampling method (ISM) approach. Upon receipt of sampling results, MFA will follow the soil profile decision tree (Figure 1 of the SMPP) to identify a soil disposal pathway for DEQ approval. This approach will allow Stella-Jones to excavate the area and load material directly into trucks for disposal, rather than stockpiling on site pending characterization and DEQ approval regarding disposal requirements.

Sampling Activities

Surface soil (0 to 6 inches) will be sampled using an ISM approach following current DEQ guidance.¹ Although the two paving areas are not connected, as they are in very close proximity to each other and the areas have similar uses, the proposed paving areas will be considered one decision unit. To increase the certainty that results are representative, the ISM sample will consist of 50 increments. The sample increment locations were selected using a systematic random sampling scheme in accordance with DEQ's Decision Unit Characterization guidance and are shown on Figure 1.

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

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

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.

