



Memorandum

To: Oregon Department of Environmental Quality Date: January 13, 2025
Donald Hanson, RG

From: Caitlin Bryan and Andrew Vidourek, RG Project No.: M1419.14.007

Re: Quarterly Progress Report for ECSI Site 537—Quarter 4, October to December, 2024

Maul Foster & Alongi, Inc. (MFA) has prepared this memorandum on behalf of Roseburg Forest Products (RFP) per the requirements of the Order on Consent (the Order) dated May 15, 2024, to provide the Oregon Department of Environmental Quality (DEQ) with quarterly progress reports describing activities conducted, and planned, at ECSI Site 537, tax lots 372W24-600 and 372W24-500, located northwest of the corner of North Central Avenue and Rossanley Drive, in Medford, Oregon (the Property).

Per the Order, RFP has committed to completion of a Remedial Action Scope of Work that is summarized as follows:

- Installation of Property access controls (perimeter fencing and signage prohibiting trespassing).
- Landscaping around the perimeter of the Property to limit windblown transport of contaminated surface soils.
- Decommissioning of the existing stormwater system.
- Development of a Site Management Plan.
- Restrict groundwater use at the Property.

During each calendar quarter following the effective date of the Order, and until remedial actions are complete, RFP will submit quarterly progress reports to DEQ via email correspondence, summarizing the following:

- Activities conducted by RFP during the previous three months.
- A summary of sampling, test results, and any other data generated or received during the previous three months.
- A description of any problems experienced by RFP, and actions taken to resolve them.
- Activities scheduled during the next three months.

330 E Mill Plain Boulevard, Suite 405, Vancouver, WA 98660
www.maulfoster.com

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R:\1419.14 Roseburg Forest Products\Document\007_2025.01.13 Final 2024 Q4 Status Report Memo\Final_2024 Q4 Status Report_ECSI Site ID 537.docx

The effective date of the Order is May 15, 2024. Actions are anticipated to be completed no later than September 30, 2025. This memorandum summarizes activities conducted during calendar quarter 4 (Q4), October through December 2024, as well as anticipated activities for calendar quarter 1 (Q1), January through March 2024.

Work Conducted Q4—October to December 2024

Site Management Plan

On December 10, 2024, a final draft of the Site Management Plan for the Property was submitted electronically to the DEQ, and on December 20, 2024, DEQ approved plan via email correspondence.

Stormwater System Decommissioning – Supplemental Geophysical Survey

According to the Order and remedial action scope of work, RFP is required to decommission the existing stormwater system. In May 2022, MFA subcontracted a camera scope and geophysical surveyor to identify the locations of stormwater utility lines, catch basins, and potential discharge points (e.g., outfalls). A portion of the stormwater system was located in May 2022, and in December 2024 an additional geophysical survey was conducted to further define the extent of the stormwater system. In December 2024, the May 2022 geophysical survey area was reevaluated to confirm prior information and the entire perimeter beyond the initial survey area was examined. Utility features were approximately located using ground penetrating radar (GPR). Subsequently, anomalies identified with the GPR during the May 2022 and December 2024 surveys were evaluated using a magnetometer to confirm if the feature was metallic, or non-metallic.

Stormwater system piping visually observed in December 2024 was confirmed to be non-metallic concrete (i.e., outfalls and stormwater pipes connected to catch basins). According to RFP personnel on the Property during the December 2024 geophysical survey, to their knowledge, the former stormwater system piping was constructed of concrete. Therefore, based on this information confirming utility line construction, the identified extent of the stormwater system (non-metallic utility lines) and water pipe (metallic utility lines) are depicted accordingly on the attached Figure. Features that may be associated with the former stormwater system are labeled as manhole/vault/catch basin and are slated for decommissioning unless reconnaissance at the time of system decommissioning provides further information (e.g., that the feature is associated with a different utility type, such as the metallic water lines).

Based on the May 2022 and December 2024 geophysical surveys, available documentation, employee knowledge, and visual observations, the extent of the stormwater system appears to be delineated. Therefore, stormwater system decommissioning will be scheduled for Q1 or Q2, 2025.

Fence Installation

In Q3 2024, RFP hired Medford Fence Company (MFC) to begin installing a fence and signage around the perimeter of the Property. MFC began the project in August and completed the installation in December 2024. Until the fence installation was completed in December 2024, RFP retained a private security company to provide 24/7 security on the Property. As the entire Property has now been fenced and gated, security personnel will no longer be retained.

Data

Except for the geophysical survey, no sampling was conducted, no new test results received, and no data was generated during Q4. Geophysical survey results are shown on the attached Figure. A brief photograph log was prepared to document the geophysical survey and fence construction and is included as an attachment to this memorandum.

Problems and Response Actions

No unanticipated problems or response actions were conducted in Q4.

Work Scheduled

RFP anticipates near term completion of the following actions:

- As per of the Stormwater System Decommissioning Work Plan dated July 23, 2024, and depending on contractor availability and weather, stormwater system decommissioning will be conducted in Q1 or Q2, 2025
- Landscaping around the perimeter of the Property will be conducted in Q1 or Q2, 2025.
- A water line will be installed in Q1 or Q2, 2025 at the Property to help with fire hazard mitigation and response.

Attachments

Limitations

Figure

Attachment—Photographs

Limitations

The services undertaken in completing this memorandum were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This memorandum is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this memorandum apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this memorandum.

Figure



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Figure Stormwater System Decommissioning Schematic

Tax Lots 372W24-600
and 372W24-500
Medford, OR

Legend

-  Outfall
-  Manhole/Catch Basin/Vault (to be Decommissioned if Confirmed to be Part of the Stormwater System)
-  Water Pipe Vault
-  Stormwater Line (Non-metallic)
-  Metallic Utility Line (Potential Non-stormwater Water Line)
-  City Sanitary Sewer
-  Property Boundary

Note
All utility features are approximate. Utility features have been identified using ground penetrating radar and a magnetometer. Based on the geophysical survey, available documentation, employee knowledge, and visual observations, the extent of the stormwater system appears to be delineated, however, additional stormwater features may be present on the property.



Data Sources
Aerial photograph obtained from the US Department of Agriculture; property boundary obtained from Jackson County.



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Attachment

Photographs



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Photographs

Project Name: Roseburg Forest Products—Medford
Remedial Action Scope of Work Assistance

Project Number: M1419.14.007

Location: ECSI Site 537, tax lots 372W24-600 and
372W24-500, Medford, Oregon

Date: December 9, 2024

Photo No. 1.

Description

Fence constructed on
the west property
boundary, facing
southeast.



Photo No. 2.

Description

Fence constructed on
the north and east
property boundaries,
facing southwest.



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Photo No. 3.

Description

Stormwater pipe discharge location to Hopkins Canal on the northeast portion of the property, facing south (stormwater system to be decommissioned).



Photo No. 4.

Description

Geophysical survey on the north portion of the property, facing north. Pink markings indicate metallic and non-metallic subsurface features.

