

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: December 18, 2024

Present at inspection:

Nancy Sawka, Inspector, DEQ WR Cleanup Program Project Manager

Roland Mueller, SJC Plant Manager

Holly Spencer, SJC Environmental Supervisor

Time of Inspection: 2:00 PM to 3:30 PM

Weather Conditions: Cloudy, some drizzle. Note that previous day had heavy rain and wind.

Site use

The Site is a wood treating facility that formerly treated with pentachlorophenol (Penta) but recently has switched to using 4,5-Dichloro-2n-Octyl-4-Isothiazolin-3-One (DCOI). Wood poles (de-barked logs) are pressure treated in retorts located on the east central part of the property. Ancillary activities at the site include log off-loading, debarking, log storage, and treated pole storage and transport.

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

- Any damage that exceeds ¾ 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:** Holly Spencer reviewed safety operations checklist with Nancy Sawka prior to inspection. Tracey Jochim, Environmental Manager for SJC, joined in by conference call for de-brief on the purpose of DEQ's site visit and inspection.

Corrective Action Updates from DEQ's 3/26/2024 Inspection (see Attachment A)

Corrective Action #1 – remedy needed for extensive mud, dirt and gravel accumulation on cap especially in the winter/rainy months. SJC is paving more of the peeler area to help minimize the tracking of mud and gravel onto the MatCon on the south part of the Site. Eventually it will be beneficial if this entire area was paved. SJC has also increased the frequency of MatCon sweeping and has hired a contractor to supplement the sweeping they do with their Bobcat. SJC has improved monitoring and recordkeeping of the sweeping events. Collected sweepings are stored in the former Incisor Building until they are transported for disposal. The sweeping logs, characterization documentation and

disposal manifests will be provided in the annual Environmental Audit Reports (EAR).

- a. Corrective Action #2 - demarcation of barrier wall: SJC has increased the frequency of painting the yellow line that marks the edge of the barrier wall and does touch ups as needed with extra paint kept at the facility.
- b. Corrective Action #3 – It was determined that there is no drain around this area, so no action was needed.
- c. Corrective Action #4 - manhole repair: SJC had the manhole repaired as required prior to the inspection.
- d. Corrective Action #5 - Re-surfacing/Re-sealing: SJC had the noted areas of cracks and exposure sealed as required. One area around the water tank pad was missed. SJC will have this area sealed prior to the next inspection.
- e. Corrective Actions #6 and 7 – DEQ approved SJC's plans for manhole repair, re-sealing and peeler paving.

2. Site Inspection Summary – Site Walk

- a. Eruption cracks and surface damage: No major cracks or eruptions were observed during the site walk.
- b. Cap margins and edges: Inspection of the cap margin showed the edges appeared to be holding up well. Although some mud was visible due to the days traffic, there was little gravel build up at the edges. (Photos 1 through 4)
- c. Repairs: Sealing of cracks to address Corrective Action #5 was observed and photographed at various locations during the site walk. It appeared that the areas noted during the 3/26/2024 inspection were adequately sealed. (Photos 5 through 9)
- d. Barrier wall demarcation: The barrier wall marking was observed around the site. The line was mostly visible, except where some minor mud covered it due to the current vehicle site traffic. (Photos 2 through 4)
- e. Other Repairs: The cracked manhole cover on the south part of the cap area was repaired so that it is now flush with the ground surface. The area around the concrete cap was sealed to the MatCon. (Photo 10)
- f. Settlement: No significant settlement was observed.
- g. Standing water: A few small puddles of standing water were present on the MatCon, but they appeared to be insignificant and not unexpected with the recent heavy rainfall.
- h. Chemical Spills: SJC reported several spills in the latter part of 2024 – a release of 45 gallons of “sludge” wastewater from the stormwater treatment filter press on 9/18/2024 and several overflow events from the stormwater treatment system in October and November 2024. All spills occurred in the southeast part of the Site near the stormwater treatment system. None of the spills appeared to impact the MatCon cap.
- i. Sweeping: Cleaning/sweeping of dirt, gravel and other debris from the MatCon has significantly improved since the last inspection. As stated above, SJC has

increased the sweeping frequency and hired a contractor to help. The extra effort was noticeable and should continue.

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

1. Provide MatCon sweeping logs in each annual (EAR)
2. Provide waste characterization documentation and disposal documentation for the MatCon sweepings in each EAR
3. Complete the sealing around the water tank pad where it was previously missed.
4. Provide the name and manufacturer of the approved MatCon sealant that was used.
5. Provide the name and equipment used by the hired contractor to help with the MatCon sweeping.

Inspector name: Nancy Sawka Signature: Nancy SAWKA Date: 1/24/2025

Attachment A

Corrective Actions Required by DEQ per 3/26/2024 MatCon inspection at the former Taylor Lumber Wood Treating Facility Superfund Site¹:

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 unto 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.

¹ DEQ, May 3, 2024, *Matcon Annual Inspection Report for the Taylor Lumber Superfund Site, Stella Jones Company – March 26, 2024.*

Attachment C - Site Map of Inspection Area



Attachment C
Site Inspection Photos



Photo 1: Cap margin near peeler on SW corner of cap.



Photo 2: Looking east, cap margin and barrier wall line near peeler area on SW corner of cap.



Photo 3: Looking west, cap margin and barrier wall line on the SW corner of cap adjacent to peeler area.

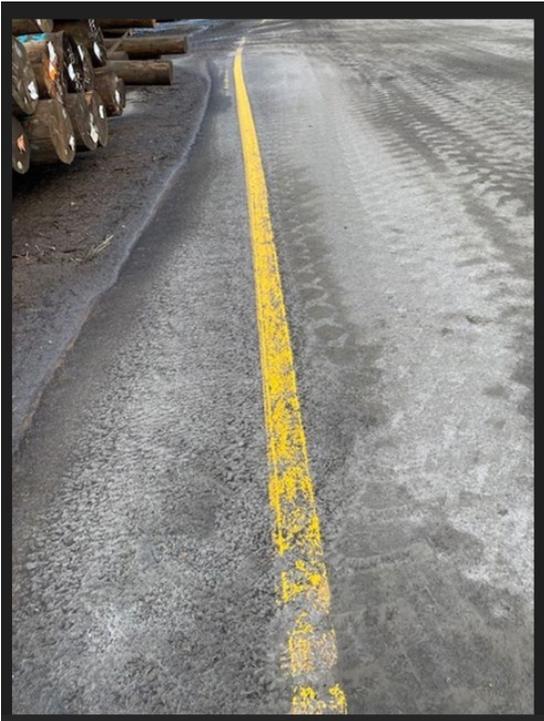


Photo 4: Cap margin and barrier wall line on the north side of the site.



Photo 5: Sealing around PW-03.



Photo 6: Sealing of multiple cracks over an area.



Photo 7: Sealing of a large area of multiple cracks near maintenance shed.



Photo 8: Sealing of miscellaneous individual cracks.



Photo 9: Water tank pad south, area needing to be sealed.



Photo 10: New manhole cover and pad.