



MEMORANDUM

Date: November 14, 2024

To: Katie Daugherty, RG
Project Manager, Oregon Department of Environmental Quality

From: Andrew Bisbee, RG
Sr. Project Manager, Apex Companies, LLC

Cc: Mike Stevens, PE, Principal Engineer, Apex Companies, LLC
Dan Fitzgibbons, Division Practice Lead, Apex Companies, LLC

Re: North Ridge Estates Superfund Site
2024 Repository Repairs & Follow-Up Inspections

2024 REPOSITORY REPAIRS

In May 2024, Apex Companies, LLC (Apex) completed the 2024 annual operations and maintenance inspection at the North Ridge Estates Superfund Site located in Klamath Falls, Oregon (the Site). The findings of that inspection were documented in the subsequent *2024 Annual Inspection Summary Report* (2024 Report; dated August 28, 2024). On August 26, 2024, Apex provided Budden's Paving Services, LLC (Budden) with the specific scope of work for the 2024 repairs at the Swimming Pool Repository (Parcels AI, AL, MBK-E and AG) and the Memorial Park Repository (Parcels MBK-D and L). Budden was subcontracted in 2022 to complete as-needed minor repairs on these DEQ-managed parcels. The scope of work for the repairs, as identified in the 2024 Report, included the following high priority targets:

Swimming Pool Repository

- Repair section(s) of split rail fencing near the east and south corners of Parcel AG to prevent unauthorized access to the repository; and
- Backfill a gully (approximately 4 to 6 inches deep and 150 feet in length) near the south corner of Parcel AG, grade the gully side slopes, and backfill/armor with 1-inch quarry rock to prevent additional erosion.

Memorial Park Repository

- Backfill a gully (approximately 6 to 8 inches deep) near the west corner of Parcel MBK-D, grade the gully side slopes, and backfill/armor with 1-inch quarry rock to prevent additional erosion; and

- Repair sparse vegetation (approximately 500 square feet) on the west central area of Parcel L and reseed with native grass to re-establish vegetation and prevent additional erosion.

On November 11, 2024, Apex conducted a follow-up visual inspection of the Swimming Pool Repository and the Memorial Park Repository and observed that Budden did not complete the scope of the repository repairs as directed. Apex last made contact with Budden on September 17, 2024, and at that time they indicated that the repairs would be completed that same week (i.e., before September 21, 2024). Since that conversation, Apex repeatedly attempted to contact Budden between September and November 2024 via multiple emails, phone calls, and an in-person visit to the rock quarry during the inspection site visit, and there has not been any response to these inquiries. It appears likely that Budden will not complete the repairs prior to the arrival of the winter snows. Apex subsequently contacted DEQ on November 12, 2024, and notified them that Apex would be considering a more reliable subcontractor to complete the repository repairs scope of work.

SUPPLEMENTAL REPAIR CONSIDERATIONS

In addition to the repository inspections discussed above, Apex also conducted follow-up visual inspections of the other parcels that were identified in the 2024 Report as having high priority findings, including Parcels AP, AR, C, H2, M, MBK-G, N, and R.

Apex observed several high priority findings that had been addressed by property owners since the May 2024 annual inspection and subsequent notification by DEQ to the homeowners, but several high priority findings remained, including the following:

- Parcel AP: A gully remains present near the southeast corner of the parcel;
- Parcel MBK-G: Gullies remain present on the north side and southeast corner of warehouse; and
- Parcel R: A gully remains present near the west edge of parcel.

Field notes and representative photographic documentation of the November 2024 parcel inspections are included in the attachments of this memorandum.

ATTACHMENTS

Attachment A: North Ridge Estates 2024 Repairs Scope of Work

Attachment B: Apex Photograph Log – Follow-Up Inspections (November 11, 2024)

Attachment A

North Ridge Estates 2024 Repairs Scope of Work

North Ridge Estates – 2024 Repairs Scope of Work

High Priority Targets (Budden Repairs)

- Memorial Park Repository (Parcels MBK-D, L)
 - **Collect before and after photos of all completed repairs.**
 - Gully (approx. 6-8" deep) on west corner of Parcel MBK-D: grade side slopes and backfill/armor with 1" quarry rock to prevent additional erosion (see photo below).



- Sparse vegetation (approx. 500 sq. ft.) on west central area of Parcel L (top of repository): reseed with native grass to re-establish vegetation and prevent additional erosion (see photo below).



High Priority Targets Continued (Budden Repairs)

- Swimming Pool Repository (Parcels AI, AL, MBK-E, AG)
 - Broken sections of split rail fencing near the east and south corners of Parcel AG: replace broken split rails (2) to prevent unauthorized access to the repository (see photo below).



- Gully (approx. 4-6" deep, 150 ft long) near south corner of Parcel AG: grade side slopes and backfill/armor with 1" quarry rock to prevent additional erosion (see aerial photo below).



Attachment B

**Apex Photograph Log – Follow-Up Inspections
(November 11, 2024)**



Swimming Pool Repository – No repairs made to split rail fencing near the east corner of Parcel AG.



Swimming Pool Repository – No repairs made to gully near south corner of Parcel AG.



Memorial Park Repository – No repairs made to gully on west corner of Parcel MBK-D.



Memorial Park Repository – No repairs made to sparse vegetation on west central area of Parcel L.



Parcel AP – Some vegetation blockage but culvert has generally unrestricted capacity.



Parcel AP – No repairs made to gully near southeast corner of parcel.



Parcel AR – Minor gravel blockage but culvert has generally unrestricted capacity.



Parcel C – Gullies sufficiently armored with river rock.



Parcel H – Gully near north edge of Lot H2 backfilled with soil and graded on slope.



Parcel M – Culvert blockage removed to enable unrestricted capacity.



Parcel MBK-G – No repairs made to gully on north side of warehouse.



Parcel MBK-G – No repairs made to gully near southeast corner of warehouse.



Parcel N – Culvert blockage removed to enable unrestricted capacity.



Parcel R – No repairs made to gully near west edge of parcel.