Memorandum

To: Nancy Sawka, Oregon Department of Environmental Quality

Date: May 28, 2025

From: Cody Schweitzer, Maul Foster & Alongi, Inc.

Project No.: M0022.01.052

Re: Soil Management Plan: Sewage Pump Repair

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 the sewage pump repair near the Site's main office building. 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.

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 dig out and repair the sewage transfer pump that is located south of the Site's main office (Figure 1). This will involve the excavation of the current sewage pump and holding tank and replacing them. The anticipated excavation to complete this upgrade is approximately 6-foot in diameter and 3-feet deep. Soil excavated during the repair will be used as backfill as much as feasible. It is anticipated that a minimal amount of material, less than approximately 10 cubic yards, will require characterization and on-site management prior to removal from the Site.

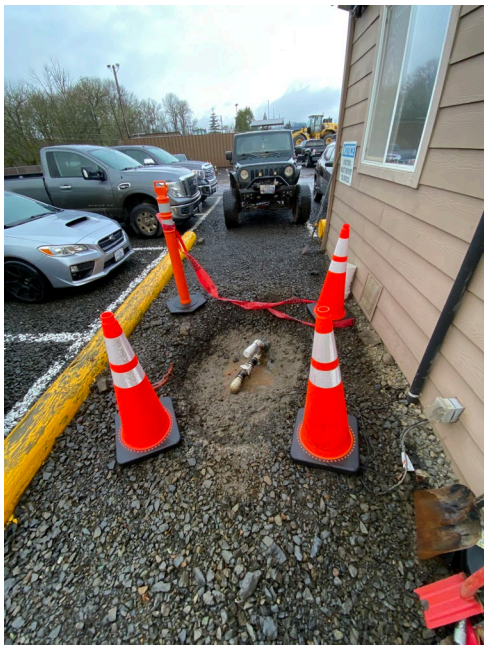

Image 1 – Sewage Pump

Figure 1: Sewage pump repair area.

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.

The stockpiled 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 clean stainless-steel measuring cup to ensure a consistent volume of material is collected for each increment.

The samples will be combined into 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.