# Memorandum

To: Nancy Sawka, Oregon Department of Environmental Quality Date: August 4, 2025

From: Cody Schweitzer, RG, Maul Foster & Alongi, Inc. Project No.: M0022.01.052

Re: Soil Management Plan: Project Description for Framing Skids Paving

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 framing skids 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.

Stella-Jones and MFA understand that DEQ approval is required prior to any excavation activities on Site. To obtain DEQ approval, this memorandum includes the following information, as required by the SMPP:

- Description of proposed excavation activities
- Field activities (sampling locations, sample methodology, chemical analyses)
- Soil characterization process

This information is primarily detailed in the SMPP but is summarized in this memorandum as it applies to the proposed Site activities.

## Proposed Excavation Activities

In 2025, Stella-Jones plans to pave the Framing Skids area shown on Figure 1 below. The ground surface of the area consists primarily of crushed gravel; the addition of asphalt pavement will allow for easier maintenance of the area. To prepare for the paving activities, the gravel will require excavation to a depth of approximately 6 inches across the approximately 43,826-square-foot area. This will generate an estimated 810 cubic yards of excavated soil.

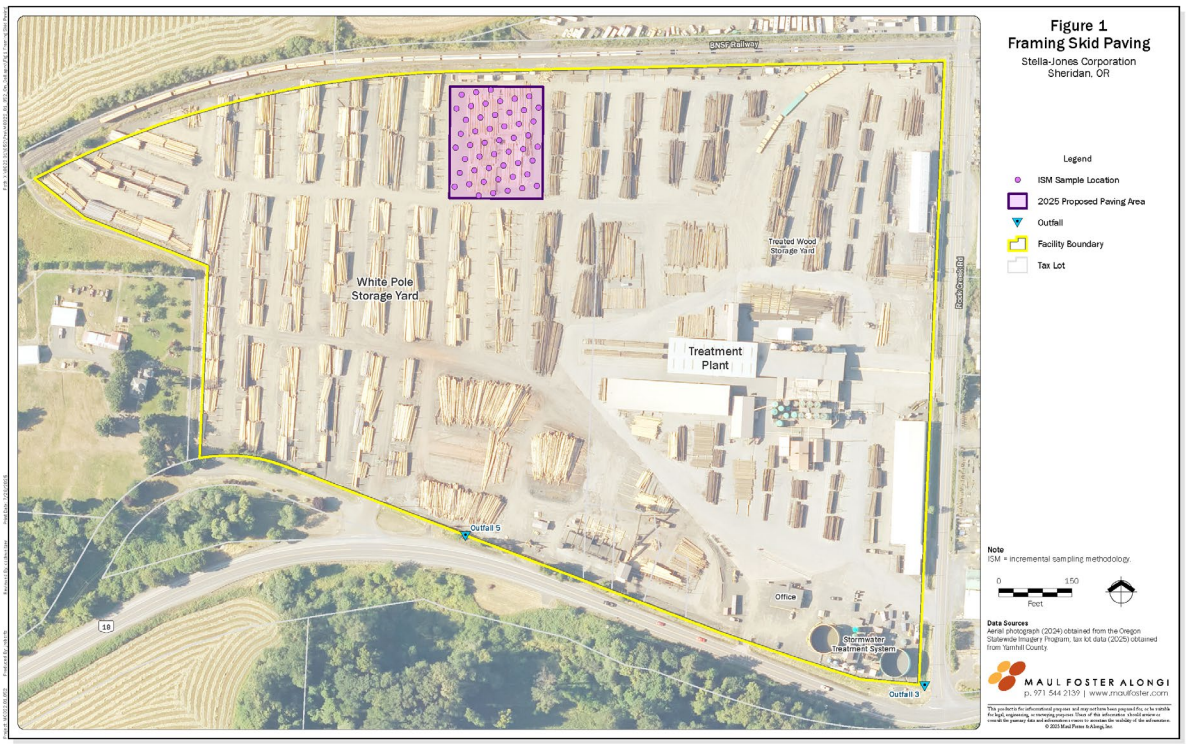


**Figure 1. Framing Skids Paving Area**

Consistent with the procedures in a previous DEQ-approved paving SMP for the Site, MFA will characterize the soil prior to excavation using the incremental sampling method (ISM) approach. Upon receipt of the ISM 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 and avoid the protracted process of stockpiling the soil on Site, sampling the soil, and awaiting the sample results and DEQ approval of the proposal disposal pathway.

## Sampling Activities

Surface soil (0 to 6 inches) will be sampled using an ISM approach following current DEQ Decision Unit Characterization guidance. [1] To increase the certainty that the results will be representative of the material to be excavated, the ISM sample will consist of 50 increments of approximately 20 grams each for a total of approximately 1,000 grams. The sample increment locations were selected using a systematic random sampling scheme in accordance with DEQ's guidance and are shown on Figure 1. The exact location of the increments may be adjusted, depending on field conditions (e.g., when an obstruction such as a hard surface is encountered). If a location needs to be adjusted based on field conditions, it will be moved to the nearest area clear of obstruction.

Sample increments will be retrieved using a stainless-steel soil core sampler or other sampling tool, as needed. Each increment will be collected in a laboratory-provided 2-ounce glass jar to ensure that a consistent volume of material is collected at each increment location. The soil from all 50 increments will then be placed in a single dedicated laboratory-provided, 1-gallon glass jar and

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

placed in a cooler on ice. The ISM sample will be submitted under chain-of-custody protocols to Apex Laboratories, LLC for processing and chemical analysis.

## Soil Characterization Process

In accordance with the SMPP for the Site, the ISM sample will be analyzed for total arsenic by EPA Method 6020B, dioxins/furans by EPA Method 1613B, and pentachlorophenol by EPA Method 8270E. The results will be compared to the DEQ risk-based concentrations for the occupational and excavation worker soil ingestion, dermal contact, and inhalation exposure pathways. 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.