From: CHAVEZ Anthony * DEQ
To: Lary, Barbara; montero-associates@charter.net
Cc: OSCILIA Margaret * DEQ; kory.kaufman@croman.net; Latimer, Shane; HANSON Don * DEQ
Subject: RE: Former Croman Mill (ECSI #535) Work Plan III - Onsite Disposal Cell
Date: Thursday, May 1, 2025 1:49:00 PM

Hi Barb and Mike,
The idea to construct a bike path on top the soil repository cell is novel and something we haven't seen before, but we're not against it. The City of Ashland will likely have some thoughts. The cleanup project team went over the work plan and have the following comments.

1. What are the plans with the materials excavated to build the repository cell? We request characterizing the material before excavating to minimize any surprises. Sampling will provide the data necessary to make informed decisions about where the material can be placed and/or used.
2. To help assure the cleanup will be successful in one attempt, we suggest you consider delineating the lateral extent of contamination at the two DUs prior to implementing the removal action.
3. If the contaminated soil will be placed under a paved bike path, we do not think that all 3-feet of clean fill cover would be necessary. Since the residual DU soil data indicate dioxin concentrations are below construction worker RBCs, potentially 1-2 feet of clean fill cover is sufficient. We can discuss this further.
4. If soil will be used for the "clean fill cover" of the repository cell, that soil should be tested to make sure it's not contaminated. If quarry rock or gravel are used, then this is not a concern.
5. Implementation may be tricky. We don't recall easy access on that part of the property. The City and neighbors will also likely have interest with the construction. A good dust suppression plan and proposed trucking routes would be good to have ready.
6. There are two drainages mapped on the site plans that cross the proposed repository cell. How have those been taken into consideration with regard to surface water flow and the bike path? Similarly, how about current/future underground utilities?
7. Is there a known timeframe for the final surface completion of the bike path after the repository cell is completed?
8. Calculated volumes of contaminated soil are reported in both tons and cubic yards and is unclear in the work plan. Please clarify.

There's a bit here, so please schedule a meeting if you'd like to discuss. We think getting this work plan dialed in will help when putting out to comment. Once we have an approved plan, DEQ will reach out to the City and neighbors and provide an opportunity to comment on the proposed removal action. Please see email dated August 29, 2024, regarding the need for public comment.

Thank you,
Anthony

From: Lary, Barbara <BLary@scsengineers.com>
Sent: Tuesday, April 15, 2025 4:11 PM
To: CHAVEZ Anthony * DEQ <anthony.chavez@deq.oregon.gov>; HANSON Don * DEQ <Don.HANSON@deq.oregon.gov>
Cc: OSCILIA Margaret * DEQ <Margaret.OSCILIA@deq.oregon.gov>; montero-associates@charter.net; kory.kaufman@croman.net; Latimer, Shane <SLatimer@scsengineers.com>
Subject: Former Croman Mill (ECSI #535) Work Plan III - Onsite Disposal Cell

Anthony and Don –
Please find attached, for your review, our revised work plan for the Former Croman Mill Site. As discussed, we have proposed onsite disposal for the additional dioxin impacted soil. We had to change locations to allow for the volume of estimated impacted soil remaining. We are hoping to implement this plan soon, as the weather is improving, and everyone is anxious to see some progress.

Please feel free to contact myself or Shane Latimer if you have any questions.

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