



**Work Plan –September
2022 Revision
Focused Infilled Log Pond
Investigation**

Former Mill Property

2210 Tamarack Street
Sweet Home, Oregon

ODEQ ECSI No. 347

Prepared for:

Northern Investments

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Project No. 1645-22001-01

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Work Plan – September 2022 Revision

Focused Infilled Log Pond Investigation

Former Mill Property

2210 Tamarack Street
Sweet Home, Oregon
(ODEQ ECSI No. 347)

1.0 INTRODUCTION

On behalf of Northern Investments (Client), EVREN Northwest, Inc. (ENW) has prepared this Work Plan for a Focused Infilled Log Pond Investigation at the former Willamette Industries Mill located at 2210 Tamarack Street in Sweet Home, Oregon (subject site). The site is referenced in ODEQ’s files as Environmental Cleanup Site Information (ECSI) No. 347. The location of the subject site is presented on the Site Vicinity Map on Figure 1.

Previous investigations have characterized the nature and extent of contamination associated with former mill operations in soil, ground water, surface water, and sediment.^{1,2} ENW understands that certain upland portions of the site have received a No Further Action (NFA) from the ODEQ; however, further investigation is required to characterize log pond infill materials that could pose risk to human health due to methane generation and possible propagation. ENW understands that log pond infill characterization represents the last remaining data gap in ongoing site-wide investigations. In a meeting on May 6, 2022, the ODEQ presented recommendations for further evaluation of infill materials. This work plan presents a scope of work consistent with ODEQ recommendations for evaluation of infill log pond materials.

2.0 BACKGROUND

2.1 Site Description and History

The subject site covers approximately 162 acres of Recreational Commercial zoned land in Sweet Home extending approximately 1 mile east of the intersection of 18th Avenue and Tamarack Street. Linn County identifies the site as tax lots 13S01E29-02200, 13S01E29CC-0110, 13S01E29DA-3000, 13S01E32BB-00200, and 13S01E32AB-0010 in Township 13 South, Range 1 East, Sections 29 and 32. The site lies between the South Santiam River and Highway 20 on generally level terrain at an elevation of 550 feet above mean sea level (Figure 1).

¹ Geosyntec, December 2017. *Site Investigation Report, Willamette Industries Site Investigation Sweet Home, Oregon*. EPA BF-00J94801. Prepared for Oregon Department of Environmental Quality.

² Enviro Assessment, PC, March 2022. *Phase I Environmental Site Assessment, Tamarack Street Property, 2210 Tamarack Street, Sweet Home, OR 97386*. Prepared for Northern Investments.

The subject site was historically operated as a lumber mill that operated from 1934 through 1989, and a plywood mill that was present from 1959 through 1994. ¹

2.2 Former Log Pond History

Historical research conducted by others has indicated the former log pond of interest was originally located in the central portion of the subject site and measured an estimated 32 acres in size. The pond is clearly visible in a 1951 USGS 15-Minute topographic map provided in Enviro Assessment, PC's Phase I ESA dated March 2, 2022. Historical aerial photographs indicate that all but a small portion of the original pond was filled sometime between 1955 and 1976. Pertinent historical aerial photographs of the former pond before and after it was filled in are presented in Appendix A.

2.3 Previous Characterization Studies of Log Pond Sediments

Former pond infill materials were explored in 2016 during Geosyntec's investigations, which were conducted in two phases during their broader site-wide investigation. ¹ In August 2016, Geosyntec excavated four test pits for soil characterization and collection of soil samples. In December 2016, Geosyntec returned to the site and advanced five direct-push technology (DPT) soil borings to a maximum depth of 25 feet to further investigate the nature and vertical extent of former log infill materials.

Subsurface materials encountered in test pits were described as predominantly gravels, cobbles, and boulders within variable amounts of fine-grained matrix to the total depth explored of 10 feet bgs. Wood debris was encountered just below a surface layer of asphalt and concrete in one of the test pits (TP-14, see Figure 3) from 1.25 feet to 3.0 feet bgs which was underlain by at least 6 feet of cobbles. Elevated PID headspace readings up to 68.6 ppmv were recorded within the shallow wood debris layer and within the underlying moist, loose, sandy gravel (up to boulder size) between 4.0 feet and 9.5 feet bgs. A general comment of "fuel odor" was noted on the test pit log of TP-14. Elevated PID readings were not noted in any of the other test pits in the area of the infilled pond.

In test pit TP-33, Geosyntec described the upper three feet consisting of gravel (cobble and boulders) with very little matrix overlying 1 foot of rounded and angular silty gravel and 1 foot of rounded boulders and cobbles. Wood debris (chips) and bark were observed at the bottom of the test pit from 4 to 5 feet bgs. No evidence of wood or organic matter was reported in the remaining test pits (TP-17, TP-30, TP-31 and TP-32, see Figure 3); however, dark gray (possibly oxidized or weathered) sandy gravels were reported in TP-17 at 1.75 feet to 10 feet bgs and in TP-30 at 8 to 8.5 feet bgs.

In soil borings advanced in November and December 2016, Geosyntec encountered predominantly unconsolidated silts, sands and gravels with interstitial wood debris occurring in boring B01 from 5 to 23 feet bgs, B04 from 2 to 10 feet bgs, B07 from 4 to 5.5 feet bgs, B14 from 4.5 to 9.5 feet bgs, B15 from 3.5 to 8 feet bgs, B18 from 1.5 to 3 feet bgs, B24 from 1.5 to 8 feet bgs, MW-01 from 4 to 10.5 feet bgs and 14 to 15 feet bgs, MW-02 from 5 to 7 feet bgs, MW03 from 4.5 to 8 feet bgs, and MW-

04 from 7 to 8 feet bgs (Figure 3). Wood debris was not noted on logs from B02 or B03. In July 2017, Geosyntec advanced boring B26 north of B01. A thin layer of wood was indicated on the boring log between 2.5 and 3.5 feet bgs.

Depth to ground water levels reported between 10.8 feet and 19.3 feet bgs in borings suggest woody materials were present both above and below the water table at one of the borings (B01). In boring B01, a dense silty sand was encountered at 23 feet bgs, and in boring B26 a stiff, dry gravelly, coarse sandy silt was encountered at approximately 17 feet bgs. As these materials were devoid of wood debris, they may delineate the depth of the former pond.

Geosyntec reported the highest vapor headspace reading in boring B03 (see Figure 3) at a depth of 2 feet bgs where a reading of 37.2 ppmv was recorded.

Laboratory analysis of samples collected from exploratory test pits and borings indicated detectable levels of dioxins, total petroleum hydrocarbons, metals, and pentachlorophenol, a wood preservative.

2.4 Conclusions Based on Previous Studies

Previous investigation results appear to support the following findings:

- Log pond fill is not monolithic but rather appears to reflect some degree of stratification, which could impact migration of methane migration through infill sediments.
- The types of potential fill present have not been fully characterized. Other types of organic materials that are common in fill materials could also be present such as demo debris.
- Previous investigations have not determined how deep the log ponds were. Hence, the thickness of infill materials and vertical extent of organic debris, which could impact distance methane can travel, is unknown.

ODEQ has concluded that various wood and organic materials associated with the former lumber mill operation historically present at the subject property pose a risk of degradation through methanogenesis, potentially resulting in generation of methane. Such methane can potentially migrate through the subsurface and accumulate in confined spaces at concentrations, which in the presence of oxygen and an ignition source, could result in an explosion hazard. Since the distance methane can travel from the source depends on site specific subsurface conditions, such as soil type and permeability and ground water levels and on landfill characteristics, including type and depth of waste, the ODEQ has concluded that further investigation is warranted.

3.0 PROPOSED SCOPE OF WORK

ENW proposes the following specific scope of work:

- Install up to eight (8) temporary soil borings within the estimated limits of the infilled log pond;

- Log soils to characterize the type and vertical extent of pond infill materials, focusing on potential methanogenic conditions.
- Complete soil borings as semi-permanent soil gas monitoring points SG01 through SG08.
- Conduct three (3) rounds of soil gas monitoring within 60 days of well completion measuring for methane (CH₄), carbon dioxide (CO₂), oxygen (O₂), hydrogen sulfide (H₂S), carbon monoxide (CO), balance gas concentrations, and static pressure measurements at each of the semi-permanent soil gas probes (SG01 through SG08).
 - Initial monitoring will be conducted upon the completion of monitoring point installation. A second round of monitoring will be conducted 14-30 days later with a third round after an additional 14-30 days.
- Evaluate field screening data.
- Prepare a report documenting site conditions.

4.0 METHODS AND PROCEDURES

This section describes the methods proposed to complete the field work described above. All work will be performed by employees and subcontractors trained and licensed to work with hazardous materials. Safety procedures will be strictly enforced in accordance with a site-specific Health and Safety Plan. Additionally, any permits required by the County or City will be obtained before work begins.

Records shall be kept of all field activities and observations. Records shall include samples/data collected, samplers involved with each sample, time, weather, and observations concerning materials textures, colors, odors, and other relevant data. All record-keeping shall be performed in appropriate field books or clipboards with appropriate forms. All field records will be kept secure at all times. **All data is confidential until released by Client.**

4.1 Soil Borings

Eight exploratory borings will be installed, and soil cores retrieved to characterize infill pond sediments using a tracked DPT drill rig operated by a driller licensed in Oregon. Soil boring locations will be spaced along the long axis of the pond as well as targeting the former pond margins. Boring locations are illustrated on Figure 3.

Soil borings are anticipated to be completed to approximately fifteen feet bgs (or refusal). However, actual completion depth will be dependent upon field observations with the objective to delineate vertical depth of the former pond by encountering native soils.

For each boring, continuous soil cores will be collected to total depth in each boring inside a clear acetate tube nested inside a stainless-steel core barrel. Each 5-foot core-barrel will be retrieved and sliced lengthwise to expose the soil core for visual examination and logging of soil cores. A LandTec GEM 5000+ landfill gas meter will be used during drilling to measure for CH₄, CO₂, O₂, H₂S, and CO for

worker safety and initial assessment of subsurface conditions. Additionally, a PID will be used to field-screen soil materials for volatile organic compounds (VOCs) and a digital thermometer will be used to measure soil temperature through the core as an increase in temperature can be suggestive of potential methane production. Soil lithology, landfill gas monitoring and field screening results (PID and temperature), and other observations, such as encountered organic material, will be entered onto a soil boring log by an ENW geologist.

Additionally, general observations regarding evidence of potential methane will be noted, as applicable, such as stressed trees or other deep-rooted vegetation, gas bubbles in standing water, or unusual odors (e.g., “rotten egg” smell).

ENW assumes that, since borings will be installed in and around a former manmade log pond, there is a low likelihood of encountering archaeological artifacts. However, if soil cuttings reveal items suggestive of an archaeological nature, work would cease, and an archaeologist would be notified.

4.1.1 Equipment Calibration

Monitoring equipment used during this investigation (e.g., PID, LandTec) will be calibrated or verified according to manufacturer's specifications. Meter calibration will be further checked with gases or buffered solutions closest to known field parameters (i.e., heptane for PID calibration).

4.1.2 Soil Logging

Soil cores will be logged by an ENW Oregon Registered Geologist. Soil samples will be described using appropriate geologic nomenclature and Unified Soil Classification System to the extent practical. Color will be described using the Munsell system. Information such as percentage of gravel, sand, and fines; particle size range, shape, and angularity; and plasticity, strength, and dilatancy will be recorded, as appropriate. In addition, the presence of organic material, odors, moisture, and interpretation of geologic unit will be documented.

The format to be recorded on boring logs is shown below:

- Light brown (5YR 6/4) silty SAND (SM) – 80% fine sand, subrounded, micaceous, 15 to 20% silty fines with low plasticity; firm; wet; some organic debris; petroleum-like odor; (FILL).

4.1.3 Decontamination Procedures

Drill tooling will be decontaminated between borings by steam-cleaning or alternatively using a sequential wash of Alconox® or trisodium phosphate solution, rinsed in tap water from a known source (e.g., municipal water), and subjected to a final rinse with distilled water. Wash and rinse liquids will be changed frequently during sampling activities, as appropriate. Wash and rinse fluids will be collected, if possible, and appropriately disposed. Fresh nitrile gloves will be worn during any sample collection and when handling tools which are to be inserted into sampling areas. Solid waste generated during sampling activities (gloves, foil, paper towels, etc.) will be appropriately disposed.

4.2 Soil Gas Probe Installation

When each soil boring has reached its final depth and soils logged and field screened, the drill string will be removed, and the open borehole will be backfilled with hydrated bentonite chips to a depth

of approximately five feet bgs (note, final depth may be modified based on field observations of likely seasonal ground water depth and depth at which organic materials are encountered). Semi-permanent soil gas probes SG01 through SG08 will be constructed within this upper portion of the remaining 2-inch diameter soil borings. Secured to a section of ¼-inch Teflon tubing, a stainless-steel screen tip will be suspended approximately two inches above the bottom of the boring while the boring is backfilled with approximately nine inches of 10/20 Colorado silica sand, forming a “sand filter pack” around the screen tip. The sand pack will be capped with a layer of granulated bentonite, and the rest of the boring annular space will be filled with a cement grout slurry. A 4-inch inside diameter threaded polyvinyl chloride (PVC) monument with removable cap will then be set in a concrete surface seal at the original surface grade. Inside the monument, the end of the Teflon tubing will be fitted with a valve that will remain closed, except when actively monitoring, to ensure sealed conditions are maintained between monitoring events. A schematic illustrating soil gas probe construction is included as Figure 4.

4.2.1 Landfill Gas Monitoring

An initial monitoring event will be conducted immediately following installation of monitoring probes with a second event 14-30 days later and a third event after an additional 14-30 days. Monitoring points will each be fitted with a valve that will remain closed between events.

ENW will use a LandTec GEM 5000 landfill gas meter to measure CH₄, CO₂, O₂, H₂S, CO, balance gas, and static pressure at soil gas probe locations SG01 through SG08 (Figure 3). To collect the measurement, ENW will tightly attach the 1/4-inch Teflon[®] tubing installed in the monitoring location to the LandTec GEM 5000 landfill gas meter prior to opening the installed valve. Initially, static pressures in inches of water (in H₂O) will be recorded along with local barometric pressure. Then, the GEM 5000’s internal pump will be started to initiate purging. Based on the small diameter of the borings (2-inch), anticipated sand filter pack thickness (9-12 inches), possible variable depth of the screened interval (to be confirmed in the field) and flow rate of the GEM 5000 (approximately 550 cc/min), the appropriate purge volume will be calculated for each monitoring location prior to purging to ensure one pore volume is removed from each probe location prior to recording readings of CH₄, CO₂, O₂, and balance gas (in percent by volume), and H₂S and CO (in parts per million [ppm]). All field data will be recorded on Field Sample Data Sheets at approximately 60 second intervals for at least 10 minutes or until gas concentrations stabilize.

Soil gas monitoring probes will remain in place for potential future monitoring until decommissioning is approved by ODEQ.

4.3 Screening Levels

CH₄ generated by solid waste landfills is regulated under federal,³ RCRA Subtitle D,⁴ and Oregon Hazardous Substance Remedial Action Rules.⁵ OAR 340-122-0040(3) requires that “in the event of a

³ 40 CFR 60 Subpart Cf

⁴ 40 CFR 258.23 and 42 USC 82

⁵ OAR 340-122-0040(3)

release of methane from a historic solid waste landfill, removal or remedial actions shall be implemented to prevent concentrations of methane exceeding or likely to exceed 1.25% by volume in confined spaces and structures, other than in equipment, piping, wells, or other structures designed for the collection and management of methane and approved by the Department.”⁵ Similarly, 40 CFR 258.23(a)(1-2) requires that owners or operators of all MSWLF (municipal solid waste landfills) units must ensure that: (1) the concentration of methane gas generated by the facility does not exceed 25 percent of the lower explosive limit for methane in facility structures (excluding gas control or recovery system components); and (2) The concentration of methane gas does not exceed the lower explosive limit for methane at the facility property boundary.”⁴

Based on ODEQ’s August 23, 2022 request, ENW proposes a screening level of 1.0% methane by volume for this investigation.

Table 4-1. Proposed Monitoring Plan

Parameter	Instrument	Screening Level
CH ₄ , CO ₂ , O ₂ , CO, H ₂ S, balance gas, and static pressure	LandTec 5000 Landfill Gas Meter	1.0% by volume

4.4 Investigation-Derived Waste Storage and Disposal

Potentially impacted investigation-derived waste (IDW) may be generated during this investigation. Characterization of all waste will be necessary to properly treat or dispose of generated waste.

Soil cuttings (if any) derived from drilling will be placed in drums, sealed, and labeled as to the a) nature of the contents, b) date contents sealed, and c) responsible party. A composite soil sample will be collected from each soil cuttings drum to determine proper method of disposition. Water associated with decontamination of sampling equipment will be drummed, sealed, and labeled.

Upon receipt of analytical data, the disposal requirements of the drummed fluid investigation-derived waste will be evaluated. It is anticipated that all waste generated will be handled as a hazardous material and will not be characteristic of hazardous waste. However, water waste determined to be impacted with contaminants at levels regulated under RCRA⁶ rules as characteristic (hazardous waste) must be disposed or treated in a manner consistent with RCRA regulation.

4.5 FIELD DOCUMENTATION

Comprehensive field documentation will be made to aid in the interpretation of monitoring results.

- For soil gas monitoring, field documentation, at a minimum, will include the date, time, location, and a description of the weather.
- Field measurements, including color, odor, texture, etc., will be recorded during drilling.

⁶ Resource Conservation and Recovery Act.

- Monitoring data will be recorded onto FSDS.
- All field work will be photographically documented in a photographic log.

5.0 Report Preparation

A report will be prepared documenting the work conducted as described in Section 4.0. During the course of this investigation, should results indicate a need for additional work, ODEQ will be consulted regarding proposed actions.

6.0 Proposed Schedule

Drilling will be conducted as soon as practical following ODEQ approval of this Work Plan.

7.0 Certification

This Work Plan has been prepared under the supervision of the following Oregon-registered Certified Engineering Geologist and Geologist.

EVREN Northwest, Inc.

Lynn D. Green, C.E.G.
Principal Engineering Geologist

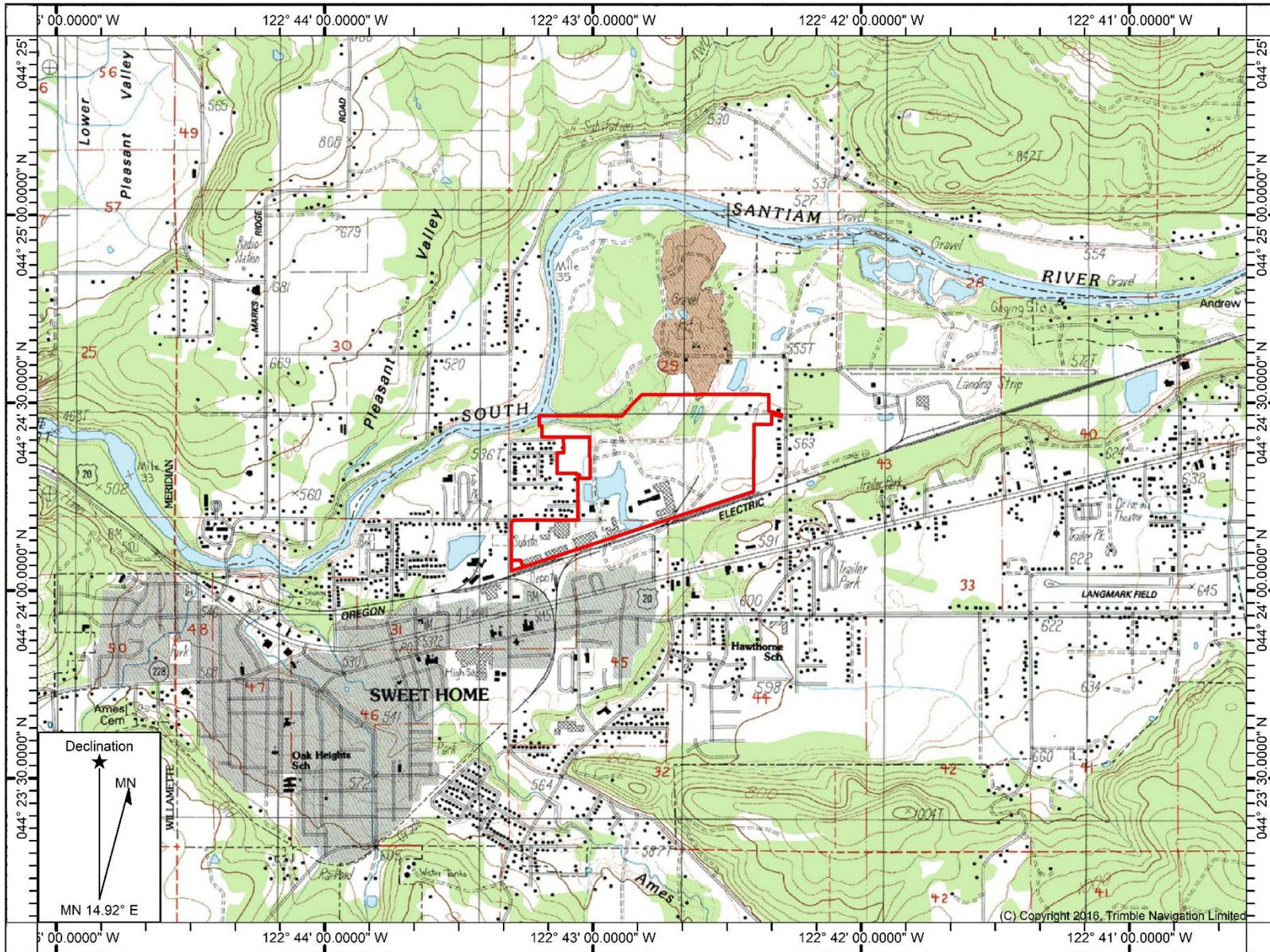
Evan Bruggeman, R.G.
Principal Field Geologist



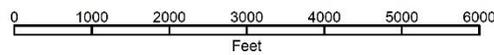
EXP. 2/1/2023



FIGURES



Name: SWEET HOME
Date: 06/22/22



Location: 044° 24' 17.8024" N, 122° 42' 49.0720" W
Contour Interval: 40 ft



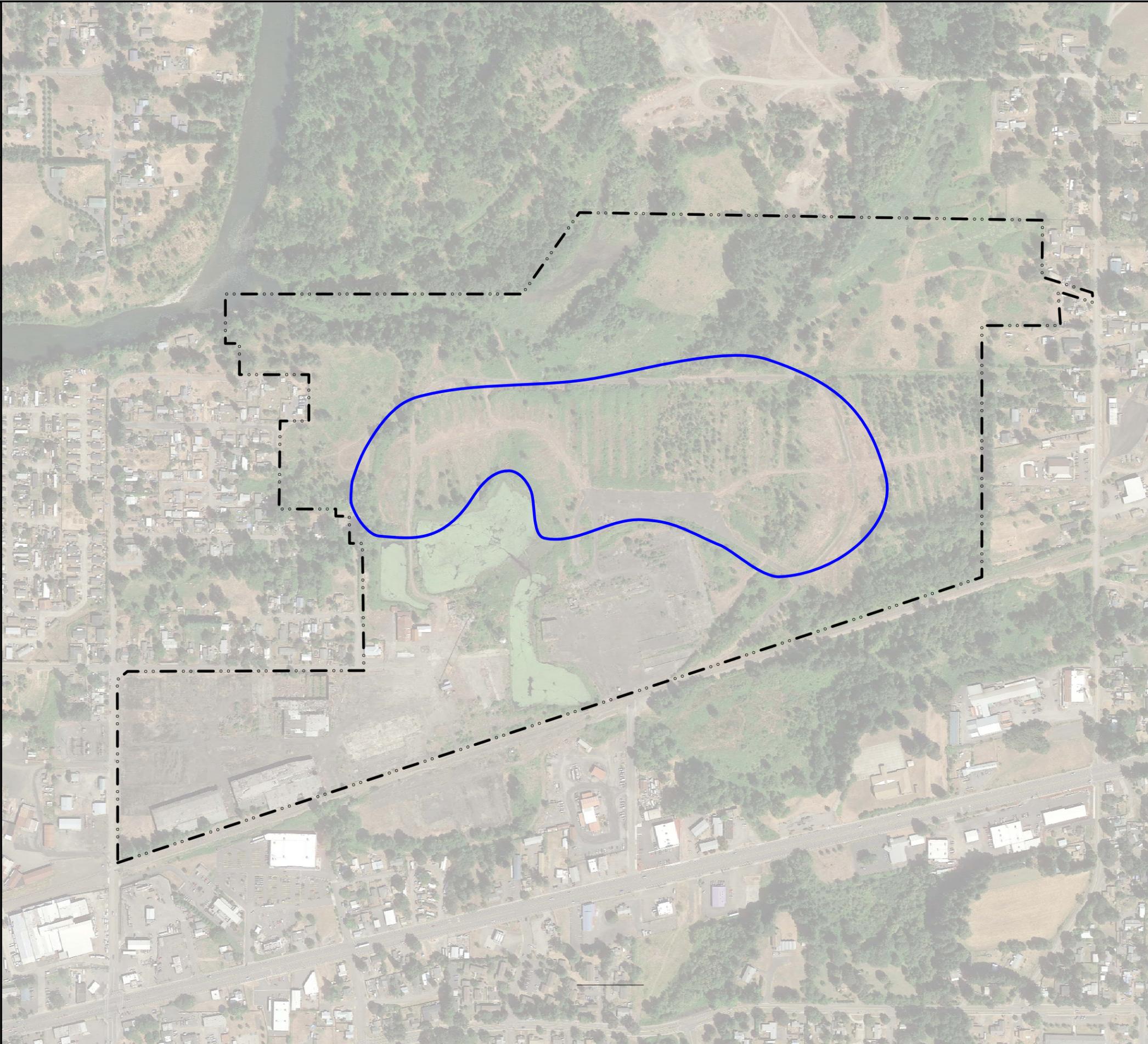
Date Drawn: 6/22/2022
CAD File Name: 1645-22001-01_fig1sv_map
Drawn By: CLR
Approved By: LDG

Former Mill Property
2210 Tamarack Street
Sweet Home, Oregon

Site Vicinity Map

Project No.
1645-22001
Figure No.
1

DRAWN BY C. ROSEBROOK 06/23/2022
CHECKED BY E. CHAPMAN 06/23/2022
APPROVED BY L. GREEN 06/24/2022
DRAWING NUMBER 1645-22001(v01)



LEGEND:



SUBJECT PROPERTY BOUNDARIES



APPROXIMATE FORMER POND OUTLINE

NOTES:

1. BASE MAP DEVELOPED FROM AN AERIAL PHOTOGRAPH MAP DATED 2022 AND ENW FIELD NOTES.
2. ALL BUILDING, STREET, AND FEATURE LOCATIONS ARE APPROXIMATE.
3. SYMBOLS REPRESENT LOCATION AND DO NOT ALWAYS REPRESENT EXACT SHAPE, SIZE, OR ORIENTATION.

APPROXIMATE SCALE



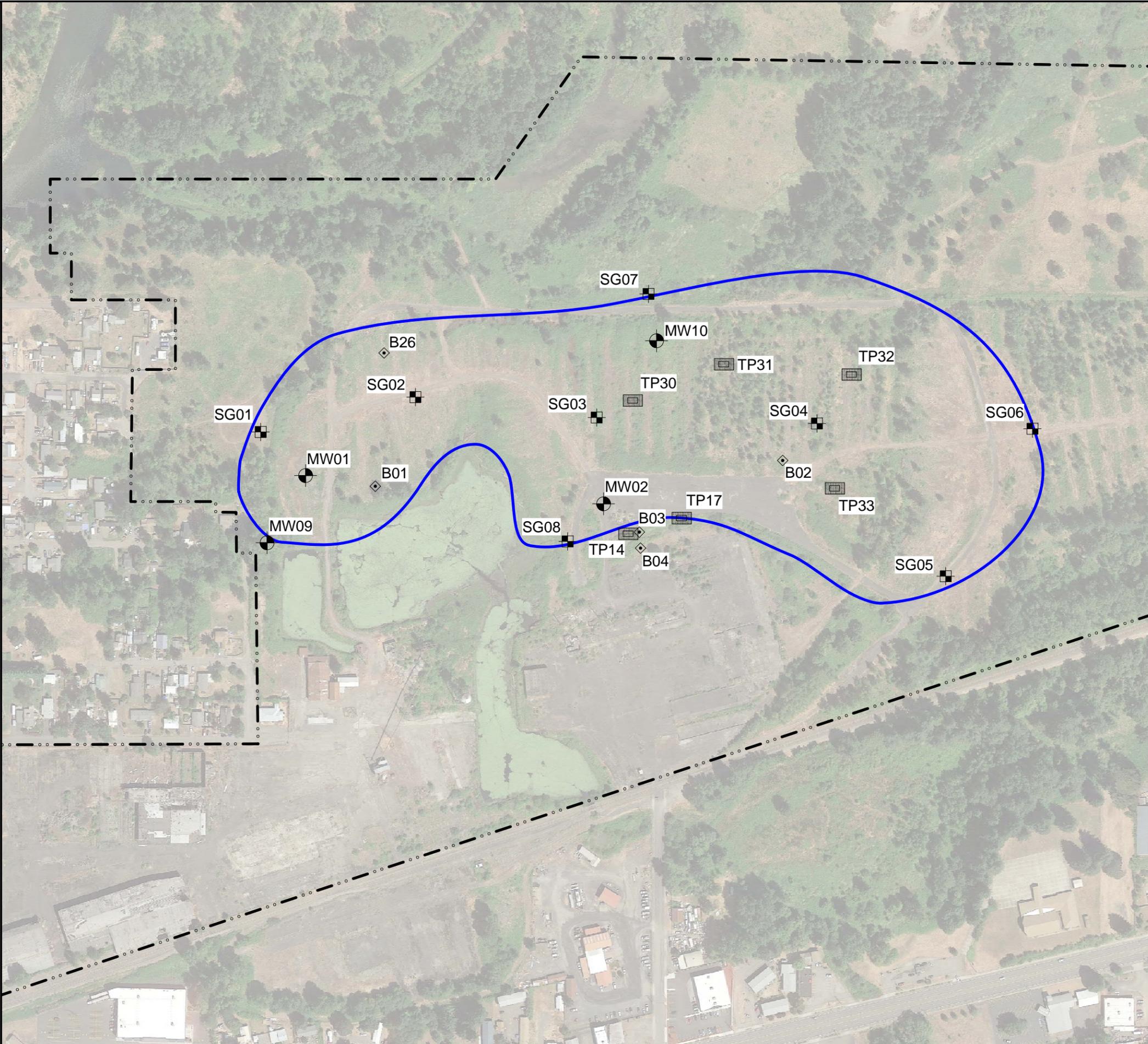
PO BOX 14488, PORTLAND, OREGON 97293
P: (503)452-5561, E: ENW@EVREN-NW.COM

FIGURE 2

SITE PLAN

COMMERCIAL PROPERTY
2296 GABLE ROAD
PORTLAND, OREGON

DRAWN BY C. ROSEBROOK [08/26/2022] E. CHAPMAN [08/30/2022] L. GREEN [08/30/2022] DRAWING NUMBER 1645-22001(v01)

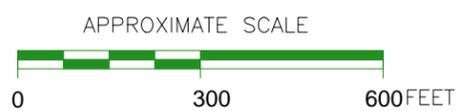


LEGEND:

-  SUBJECT PROPERTY BOUNDARIES
-  APPROXIMATE FORMER POND OUTLINE
-  PREVIOUS SOIL BORING ADVANCED BY GEOSYNTec (ONLY THOSE IN OR IMMEDIATELY PROXIMATE TO THE FORMER LOG POND ARE SHOWN)
-  PREVIOUS TEST PIT ADVANCED BY GEOSYNTec (ONLY THOSE IN OR IMMEDIATELY PROXIMATE TO THE FORMER LOG POND ARE SHOWN)
-  MONITORING WELL INSTALLED BY GEOSYNTec LOCATION (ONLY THOSE IN OR IMMEDIATELY PROXIMATE TO THE FORMER LOG POND ARE SHOWN)
-  PROPOSED ASSESSMENT TEMPORARY BORING/SOIL GAS PROBE LOCATION

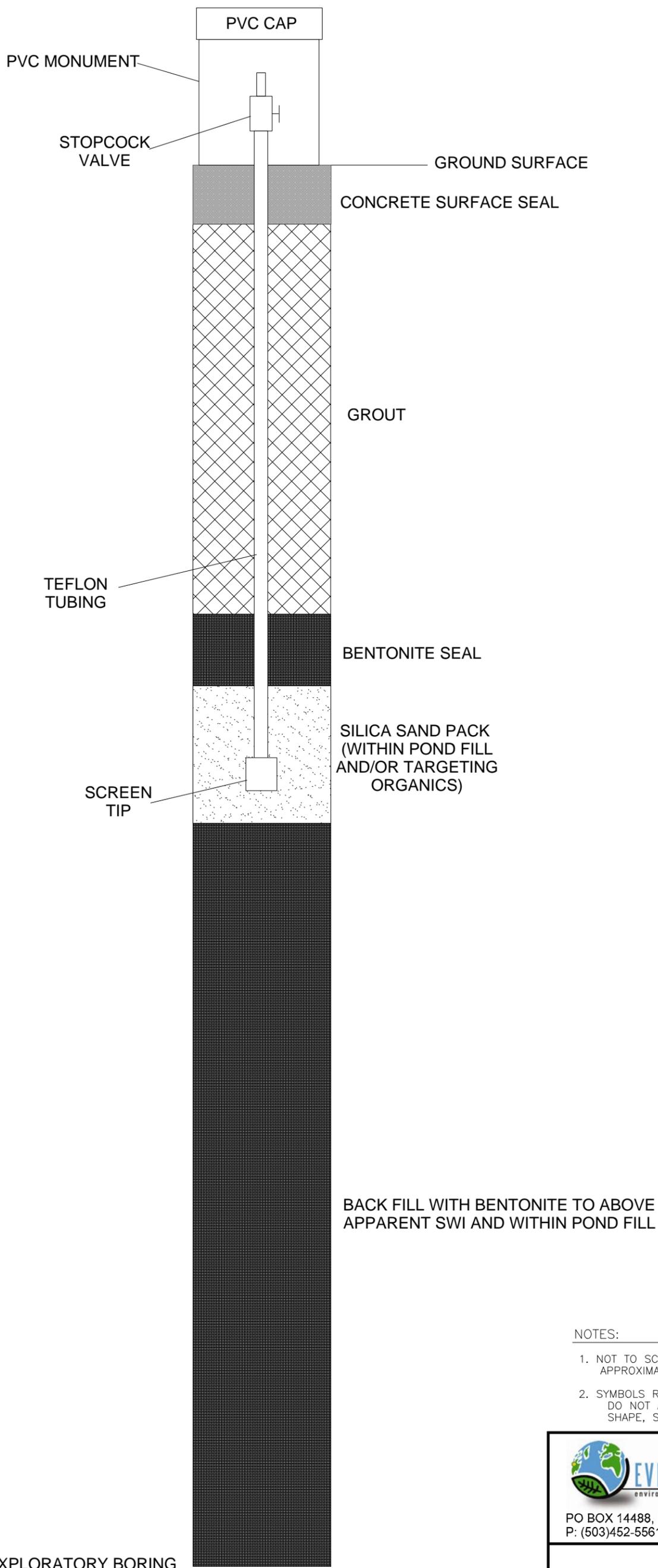
NOTES:

1. BASE MAP DEVELOPED FROM AN AERIAL PHOTOGRAPH MAP DATED 2022 AND ENW FIELD NOTES.
2. ALL BUILDING, STREET, AND FEATURE LOCATIONS ARE APPROXIMATE.
3. SYMBOLS REPRESENT LOCATION AND DO NOT ALWAYS REPRESENT EXACT SHAPE, SIZE, OR ORIENTATION.



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FIGURE 3
PROPOSED BORING/MONITORING LOCATIONS
COMMERCIAL PROPERTY
2296 GABLE ROAD
PORTLAND, OREGON



NOTES:

1. NOT TO SCALE, ALL FEATURES ARE APPROXIMATE.
2. SYMBOLS REPRESENT LOCATION AND DO NOT ALWAYS REPRESENT EXACT SHAPE, SIZE, OR ORIENTATION.

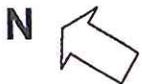


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FIGURE 4
SOIL GAS PROBE SCHEMATIC
COMMERCIAL PROPERTY
2296 GABLE ROAD
PORTLAND, OREGON

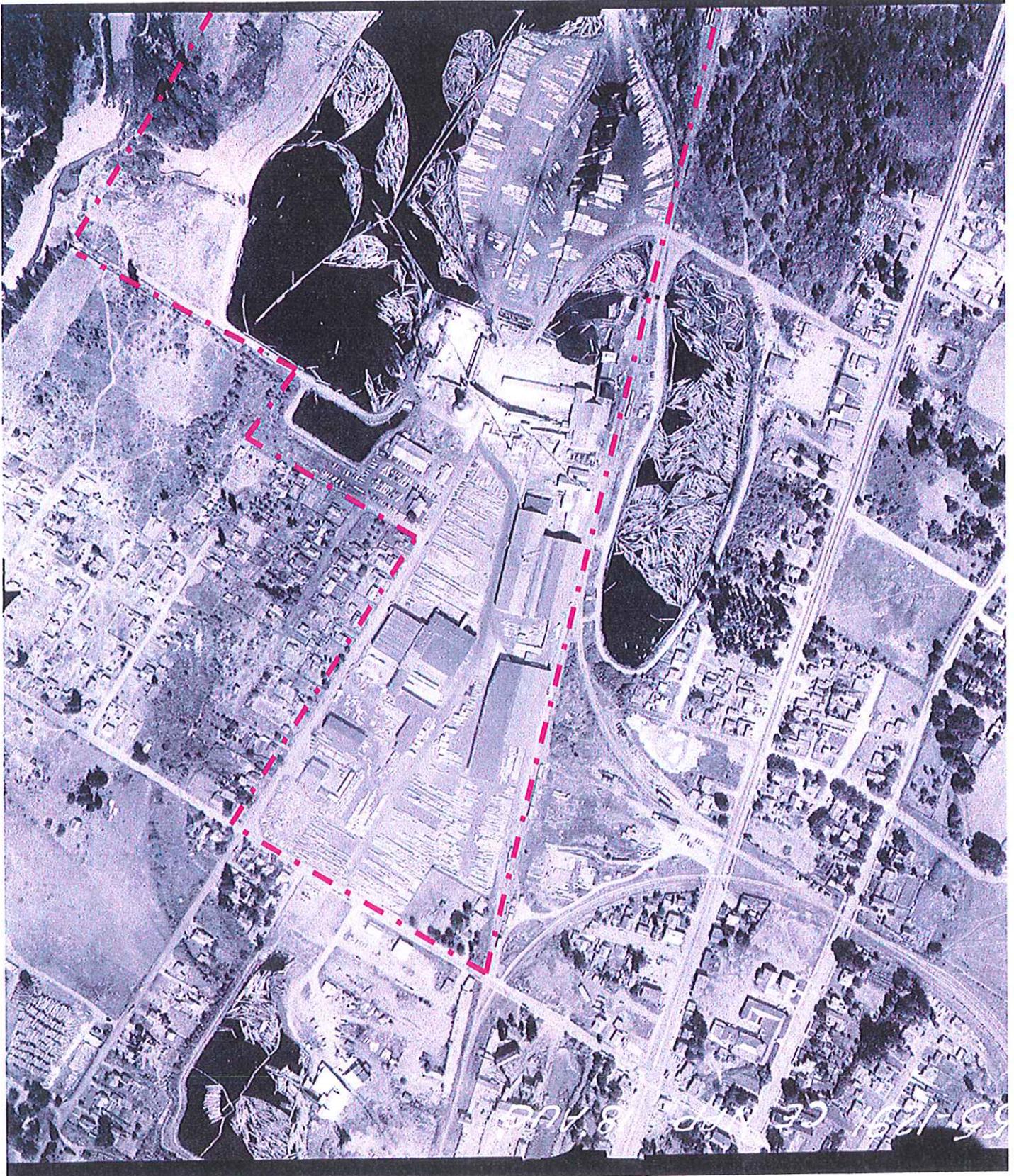
APPENDIX A

Historical Aerial Photographs



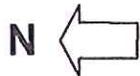
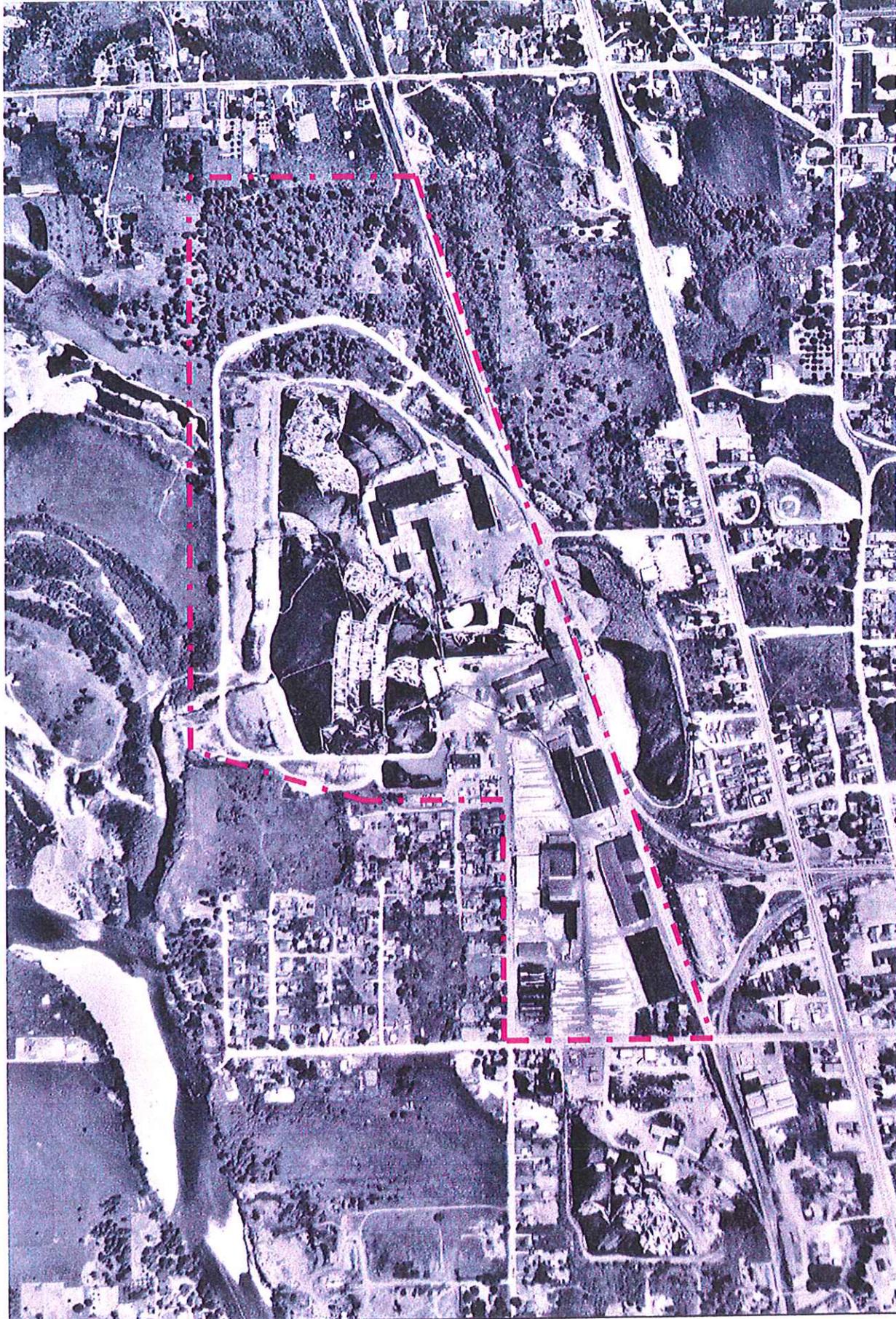
Approximate Scale:
1 inch = 440 Feet

Historical Aerial Photograph - 1955
Willamette Industries – Sweet Home Plywood Site
Tamarack Street, Sweet Home, Oregon
(Source: U.S. Army Corps of Engineers, Portland, Oregon)



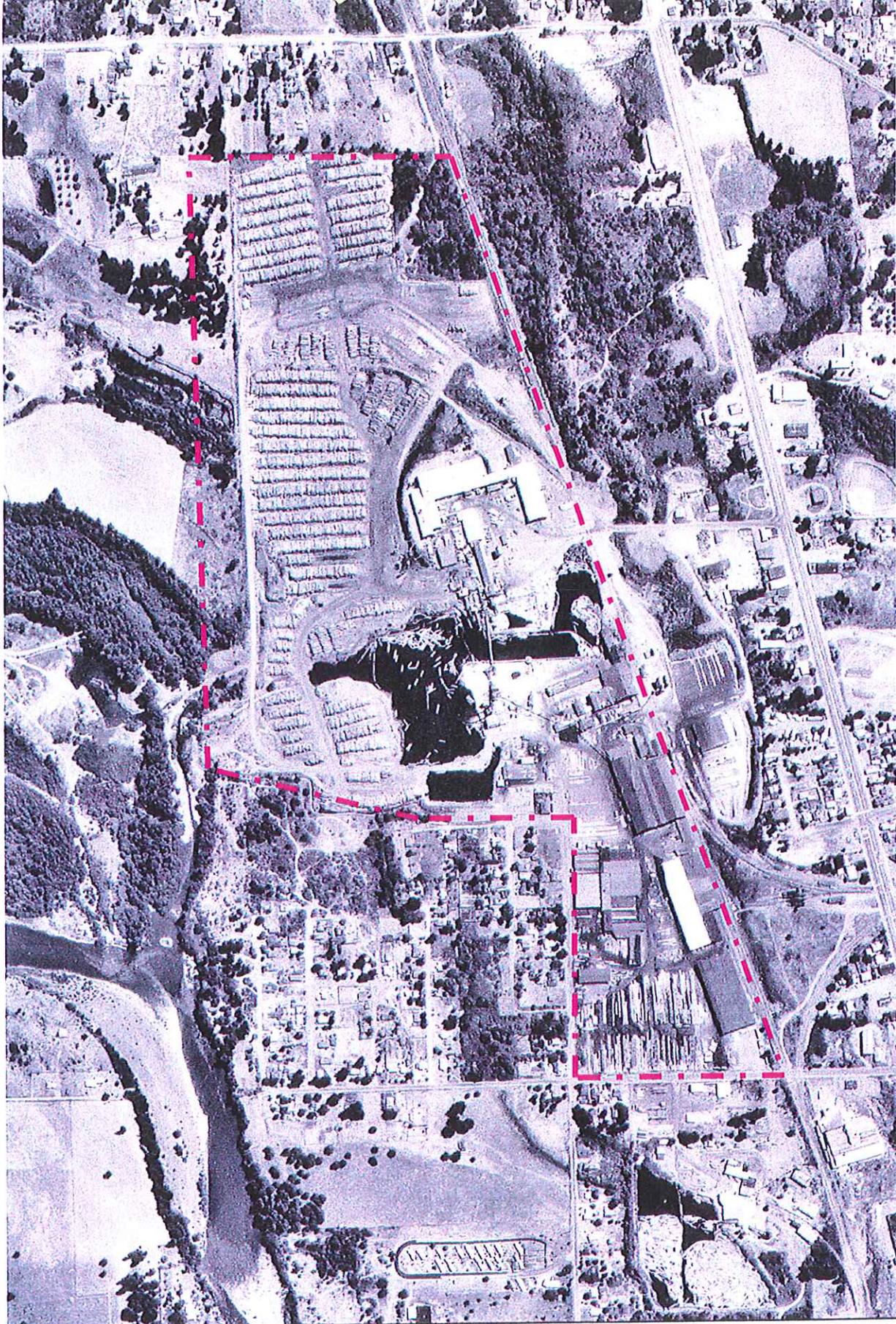
Approximate Scale:
1 inch = 440 Feet

Historical Aerial Photograph - 1955
Willamette Industries – Sweet Home Plywood Site
Tamarack Street, Sweet Home, Oregon
(Source: U.S. Army Corps of Engineers, Portland, Oregon)



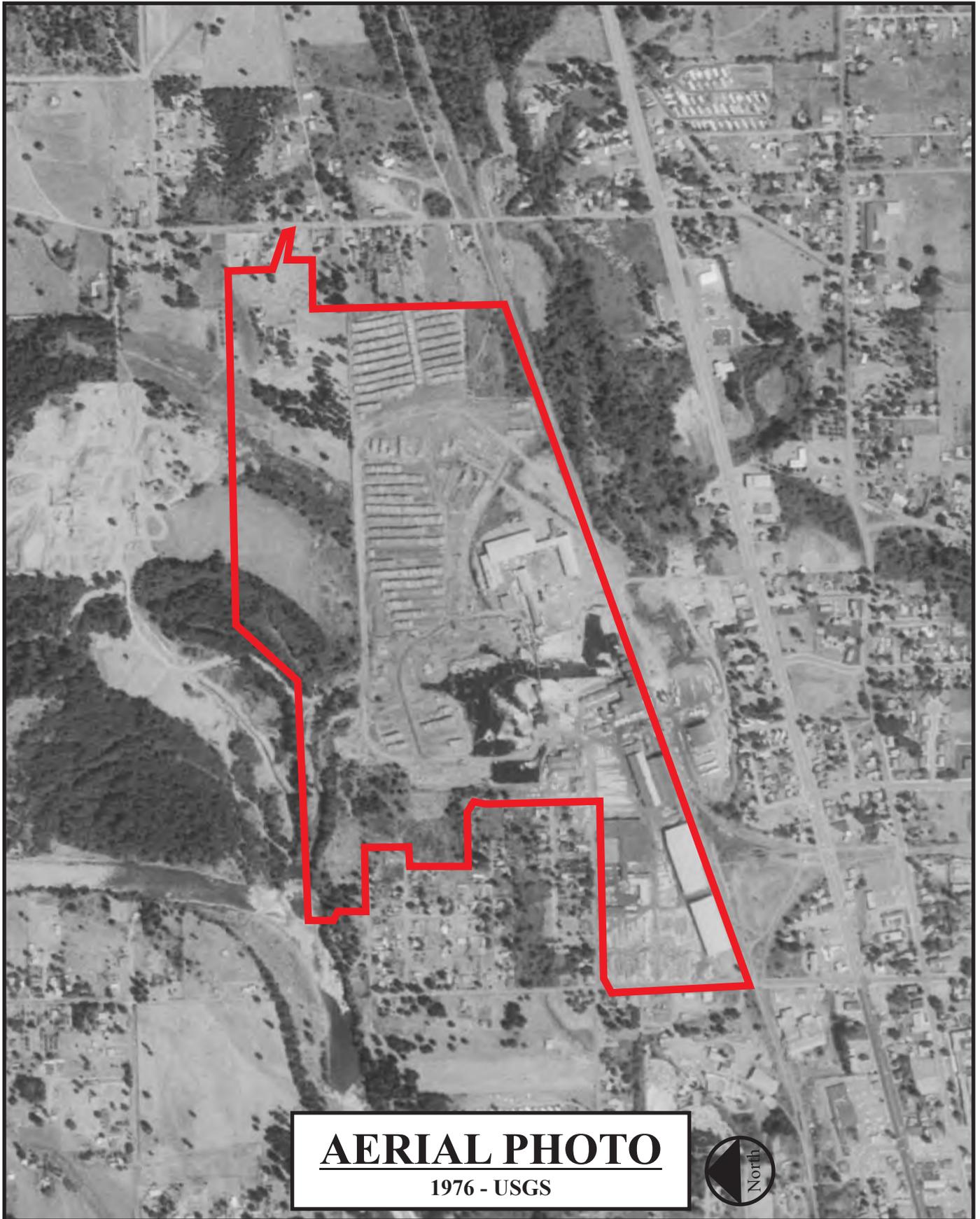
Approximate Scale:
1 inch = 596 Feet

Historical Aerial Photograph - 1962
Willamette Industries – Sweet Home Plywood Site
Tamarack Street, Sweet Home, Oregon
(Source: U.S. Army Corps of Engineers, Portland, Oregon)



Approximate Scale:
1 inch = 560 Feet

Historical Aerial Photograph - 1972
Willamette Industries – Sweet Home Plywood Site
Tamarack Street, Sweet Home, Oregon
(Source: U.S. Army Corps of Engineers, Portland, Oregon)



AERIAL PHOTO

1976 - USGS



2022-02-018
MARCH 2, 2022
PLATE: B8

PHASE I ENVIRONMENTAL SITE ASSESSMENT
TAMARACK STREET PROPERTY
2210 TAMARACK STREET
SWEET HOME, OR 97386

ENVIRO
ASSESSMENT, PC
Environmental • Hydro • Geology

PHONE (844) 742-7311 FAX (877) 623-5493



AERIAL PHOTO

1980 - USGS



2022-02-018
MARCH 2, 2022
PLATE: B7

PHASE I ENVIRONMENTAL SITE ASSESSMENT
TAMARACK STREET PROPERTY
2210 TAMARACK STREET
SWEET HOME, OR 97386

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AERIAL PHOTO

1994 - GOOGLE



2022-02-018
MARCH 2, 2022
PLATE: B6

PHASE I ENVIRONMENTAL SITE ASSESSMENT
TAMARACK STREET PROPERTY
2210 TAMARACK STREET
SWEET HOME, OR 97386

ENVIRO
ASSESSMENT, PC
Environmental • Hydro • Geology

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Approximate Scale:
1 inch = 560 Feet

Historical Aerial Photograph - 1996
Willamette Industries – Sweet Home Plywood Site
Tamarack Street, Sweet Home, Oregon
(Source: U.S. Army Corps of Engineers, Portland, Oregon)