



Council Study Session

February 5, 2023

Agenda Item	Formal Croman Mill site cleanup status update	
From	Brandon Goldman	Community Development Director
Contact	Brandon.goldman@ashland.or.us	
Item Type	Requested by Council <input type="checkbox"/> Update <input checked="" type="checkbox"/> Request for Direction <input type="checkbox"/> Presentation <input type="checkbox"/>	

SUMMARY

The cleanup of the former Croman Mill site involves soil removal and sampling to address contamination, particularly from the presence of dioxins and furans. This process is guided by DEQ standards to ensure environmental safety and proper management of excavated material.

POLICIES, PLANS & GOALS SUPPORTED

The project aligns with DEQ's environmental policies, emphasizing sustainable redevelopment and adherence to clean fill standards. It supports the city's goal of transforming the site into a viable space for mixed land use.

BACKGROUND AND ADDITIONAL INFORMATION

The former Croman Mill site, spanning 60 acres near Ashland's southern end, is undergoing a DEQ-led environmental cleanup for redevelopment, including potential residential use. Operations at the mill, active from 1934 to 1995, resulted in surface soil contamination. In spring 2023, sampling revealed elevated levels of dioxins and furans, exceeding DEQ's safety criteria. The cleanup plan involves soil removal and disposal at specific sites, with ongoing assessments to ensure all contamination is addressed.

The Attached SCS Engineering report details a structured approach to excavate affected soil, with careful monitoring and confirmation sampling to ensure complete removal of contamination. This process also includes transporting the contaminated soil to designated disposal sites. Following the initial cleanup of the site by the Croman Corporation under DEQ's supervision, SCS Engineering will conduct further testing to assess the remaining extent of contaminants. Depending on these findings, a subsequent remediation plan may be developed to address any residual contamination. This systematic approach ensures thorough environmental restoration of the property.

The property owner, City and DEQ aim to remediate the site effectively to pave the way for its redevelopment into a mixed-use area, emphasizing residential development. The plan adheres to DEQ's rigorous standards for environmental safety and sustainability, reflecting a commitment to revitalizing the area while protecting public health and the environment.





Council Study Session

FISCAL IMPACTS

The voluntary cleanup of the former Croman Mill site is being conducted by the Croman Corporation under the supervision of DEQ, resulting in no financial burden on the City. This cleanup is a crucial step towards clearing the site for redevelopment, potentially enhancing economic and residential opportunities in the area.

DISCUSSION QUESTIONS

City Staff is prepared to address general inquiries from the Council regarding the Croman Mill site cleanup. For more complex questions, staff can facilitate communication with the DEQ project manager for further clarification.

ATTACHMENTS AND REFERENCES

- [DEQ Fact Sheet - Environmental Cleanup 12/14/2023](#)
- [SCS FINAL Work Plan for Interim Remedial Action/Additional Soil Sampling dated 11/20/2023](#)



Fact Sheet

Former Croman Mill Environmental Cleanup and Redevelopment

The Oregon Department of Environmental Quality is reviewing the former Croman Mill property for proposed redevelopment, which would allow for a mix of land uses, including residential development. The former lumber mill's operations contaminated surface soil at different places on the property. DEQ has approved a cleanup plan for environmental contractors to remove and dispose the contaminated soil. The former Croman Mill property covers about 60 acres and is near the southern end of Ashland, between Siskiyou Boulevard and Interstate 5.

Sampling results

During spring 2023, the property owner conducted a DEQ-approved sampling across the site. At a few locations, the sampling found dioxins and furans in shallow soils above residential and occupational use levels allowed by DEQ. Dioxins and furans are a class of toxic chemicals produced by industrial and natural sources that can increase the risk of cancer and pose other health effects. The highest dioxin and furan concentration of 152.5 parts per trillion was found at a former wood burner location. That level of dioxin and furans is greater than DEQ's health-based screening criteria for residences and places of work.

DEQ will oversee the soil removal work to address the contamination, which may start in late 2023 or early 2024. As the soil is removed, the property owner will further sample soil to confirm there isn't more contamination. Based on the sampling results there may be additional assessment. Heavy equipment will excavate the soil and load it into dump trucks, which will haul the excavated soil from the site to a privately owned quarry in Eagle Point for disposal. Some of the soil will be taken for disposal to Dry Creek Landfill, also in Eagle Point.

Mill background

Croman Mill operated at the site from 1934 to 1995. Mill activities included general sawmill and planing operations. Additionally, wood treating, wood waste burning and landfilling of wood waste and other solid waste occurred on the site. In 1987, DEQ identified wood treating chemicals, pentachlorophenol (PCP) and trichlorophenol (TCP) in shallow soil on the site. During 1989, DEQ oversaw the removal of four underground storage tanks that once held gasoline, diesel, and waste oil and the removal of nearly 12,000 cubic yards of

Translation or other formats

[Español](#) | [한국어](#) | [繁體中文](#) | [Русский](#) | [Tiếng Việt](#) | [العربية](#)

800-452-4011 | TTY: 711 | deqinfo@deq.oregon.gov

contaminated soil. The mill closed in 1996 and demolition of mill buildings started in 2011. Prior to mill use, the property, and surrounding area, had been used for agricultural purposes.

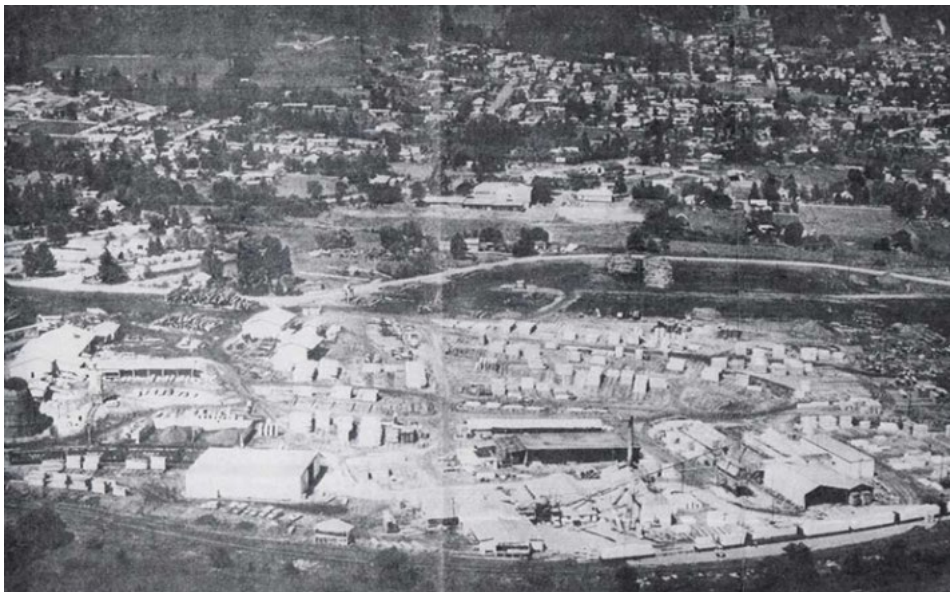
For more information go to DEQ's [Environmental Cleanup Site Information database for the Croman Mill project](#).

The City of Ashland has web pages for the [Croman Mill District Plan](#) and [Croman Mill District Updates](#).

Contacts

Anthony Chavez, cleanup project manager,
anthony.chavez@deq.oregon.gov,
541-687-7348.

Dylan Darling, public affairs specialist,
dylan.darling@deq.oregon.gov, 541-
600-6119



Aerial view of Croman Mill in operation in 1962, when it was known as McGrew Sawmill. Photo courtesy Southern Oregon Historical Society

Non-discrimination statement

DEQ does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities. Visit DEQ's [Civil Rights and Environmental Justice page](#).

165 E. Seventh Ave., Suite 100, Eugene, OR 97401
Phone: 541-686-7838, Toll Free in Oregon: 800-844-8467
Updated December 2023

November 20, 2023

File No. 04222021.00

Mr. Anthony Chavez
Mr. Don Hanson
Oregon Department of Environmental Quality

Subject: FINAL Work Plan for Interim Remedial Action/Additional Soil Sampling
Croman Mill Property (Oregon DEQ ECSI No. 535)
146 Mistletoe Road, Ashland, Oregon

Dear Don and Anthony:

On behalf of Dwain and Bud, LLC, SCS Engineers has prepared a work plan detailing the removal of impacted soil and additional soil sampling for the former Croman Mill located in Ashland, Oregon (Figure 1). The initial site investigation was conducted under an approved Work Plan¹, and preliminary results were presented in a memo dated June 19, 2023². Soils in the area of the former dip tank Decision Unit 01 (DU01) and the two wood burners (DU02 and DU03) are impacted with dioxins and furans at concentrations above the Oregon Department of Environmental Quality (DEQ) residential and occupational risk-based concentrations (RBCs)³. We propose combining the delineation of these impacted areas with interim remedial removal action to expedite work and reduce analytical costs.

Sediments at the bottom of the pond have estimated concentrations of dioxins and furans, below the laboratory reporting limits, as well as diesel and heavy oil. Future development of the site will likely include filling the manmade pond with clean fill, making the sediments inaccessible. The pond will be discussed further at a later time. Shallow groundwater near the pond is also impacted by heavy oil and diesel and will be addressed through a beneficial use and risk assessment.

Other detections in soils include heavy oil and benzo(a)pyrene to the north of the former maintenance shop. These concentrations are above the residential RBCs, but below urban and occupational RBCs and will be addressed at a later time.

¹ SCS, 2023a. Revised Site Investigation Work Plan, Croman Mill Property, 146 Mistletoe Road, Ashland, Oregon, Oregon DEQ ECSI No. 535, February 25.

² SCS, 2023b. Memo to Anthony Chavez, Oregon Department of Environmental Quality (DEQ) re: Croman Mill Site, Ashland, Oregon – ECSI #535 Site Investigation Data, June 19.

³DEQ, 2023. Risk-Based Concentrations for Individual Chemicals, Revision: May 2018 amended June 2023.



PURPOSE

The purpose of this work plan is to describe additional sampling to define depth and lateral extent of impacted soils in DU01, DU02, and DU03. Based on incremental sampling methodology (ISM) results, we propose removing contaminated surface soils and then testing soils at depth, which may simultaneously serve as cleanup confirmation. This would also decrease the risk of cross-contamination. Lateral extent will be confirmed by collecting additional ISM samples from the perimeter of each DU.

In addition, this work plan addresses possible impacts to shallow sediment/soils associated with surface drainage features on the property.

PROCEDURES

Soil Removal

Initial ISM samples were collected from DU01, DU02, and DU03 at approximately 6 inches below surface. Soils will be removed from the three areas to a depth of 1 foot, and the lateral extent of each DU will be expanded by approximately 30 percent, as described below and shown as green outlined areas in Figure 2.

Table 1. Decision Units and Excavation Quantities

Decision Unit	Original Size	Excavation Size	Total Yardage (cubic yards)
DU01 – dip tank area	155 feet (east/west) by 60 feet (north/south)	1-foot depth 200 feet (east/west) by 80 feet (north/ south)	593
DU02 – north burner	75-foot diameter	1-foot by 100-foot diameter	291
DU03 – south burner	75-foot diameter	1-foot by 100-foot diameter	291

Total soil volume to be removed is approximately 1,200 cubic yards. Approximately 600 yards of soil from the dip tank area (DU01) will be disposed of at a permitted Subtitle D landfill, as allowed by the No Longer Contained-In Determination memo⁴ issued by DEQ on November 13, 2023.

Approximately 600 cubic yards excavated from the north and south burner (DU02 and DU03) will be

⁴ DEQ, 2023. Memo to Croman Mill Project File, Subject: No Longer Contained-In Determination, Croman Mill Site, 146 Mistletoe Road, Ashland, Oregon (ECSI #0535). November 13.

disposed of at the Greb Pit, a nearby quarry, under a Solid Waste Letter of Authorization (SWLOA)⁵ issued by DEQ and dated November 15, 2023. Copies of both documents are attached.

Confirmation Sampling

Confirmation ISM soil samples will be collected from the surface of the bottom of each excavation and will consist of 50 subsamples totaling approximately one kilogram. Following ISM processing by the laboratory, samples will be analyzed for dioxins and furans. This will result in a total of three ISM confirmation samples, one per DU. One duplicate sample will be collected from DU01 as a project QA/QC sample.

To confirm lateral extent of contamination, ISM samples will be collected from the perimeter of each excavation, approximately 10 feet beyond the edge of the excavation as shown in magenta outlines on Figure 2.

- For DU01, an ISM sample will be collected from each of the four sides, so that if the dioxin concentration exceeds the RBC, the relative direction of those impacts may be determined (Figure 2). Thirty (30) subsamples totaling approximately one kilogram will be collected from each area from approximately 6 inches below the surface. This will result in four samples.
- Soil sampling to delineate lateral extent near DU02 and DU03 will be a circular, 10-foot wide ring around each area. Each circle will be divided in half and one lateral sample collected from each side of the circle. This will result in a total of four samples, two from each wood burner-associated DU. No field QA/QC samples are planned for the perimeter samples.

Table 2. List of Samples

Decision Unit	Type of sample	Dimensions of sample areas	Number of ISM Samples	Analytical
DU01	Confirmation sample/Depth	200 feet by 80 feet @ 1-foot bgs	1 + duplicate	Dioxins and furans by EPA Method 1613B PCP and TCP by EPA 8270D ⁶
	Perimeter*	2 – 200 feet by 10 feet 2 – 80 feet by 10 feet	4	Dioxins and furans

⁵ DEQ, 2023. Solid Waste Disposal Permit: Letter Authorization #1748. Issued to: Southern Oregon Rock LLC. For Greb Pit X at 528 Linn Road, Eagle Point, Oregon. November 15.

⁶ PCP = pentachlorophenol and TCP = 2,3,4,6-tetrachlorophenol

Decision Unit	Type of sample	Dimensions of sample areas	Number of ISM Samples	Analytical
DU02	Confirmation Sample/Depth	100-foot diameter circle @ 1-foot bgs	1	Dioxins and furans
	Perimeter*	½ perimeter by 10-foot width	2	Dioxins and furans
DU03	Confirmation Sample/Depth	100-foot diameter circle @ 1-foot bgs	1	Dioxins and furans
	Perimeter*	½ perimeter by 10-foot width	2	Dioxins and furans

Note: confirmation samples will include 50 subsamples and perimeter samples will include 30 subsamples.

*= perimeter samples to be collected at approximately 6 inches bgs.

bgs = below ground surface

Soils in these areas appear to be relatively shallow and weathered granite (bedrock) was observed in some areas. There may be areas where soil removal is limited and this will be documented during excavation and soil sampling. Both soil removal and confirmation sampling will need to be adapted should weathered granite be encountered at targeted depths.

Drainage Soil Sampling

As requested by DEQ, soil samples will be collected from drainage features that appear to potentially move water and sediments offsite. An intermittent drainage feature was observed with flowing water during the initial site investigation in May 2023 on the northern portion of the subject property (in DU07). The intermittent drainage feature appeared to originate north and east of the pond and flow toward the northeast. There was a gap in the berms along the northeast property boundary and the drainage appeared to run through the gap and exit the property. SCS proposes to collect sediment at this drainage feature using a composite sampling methodology consisting of approximately 10 subsamples in proximity to the property boundary. Sample locations will be mapped and documented, accordingly.

South of the former wood burners, a second, intermittent drainage appears to flow along the southern property boundary and exit the subject property near the southeast corner. SCS proposes to collect a composite sample consisting of approximately ten samples near where it exits the property (Figure 2). If any other drainages are observed that appear to leave the property, particularly near DU02 and DU03, these will also be sampled using the same protocol. If water is observed flowing in any of the drainages, a water sample will be collected.

All sediment samples will be analyzed for dioxins and furans, as well as NWTPH-Dx (since diesel and motor oil were detected in some site soils) and polyaromatic hydrocarbons (PAHs). The sediment samples will also be analyzed for pentachlorophenol (PCP) and 2,3,4,6-tetrachlorophenol (TCP).

Mr. Anthony Chavez
November 20, 2023
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REPORTING

Preliminary soil analytical results will be submitted to DEQ in memo format for review and discussion. All results will be included in a final closure report to be submitted once field work and sampling are complete.

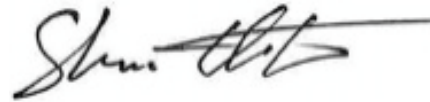
SCHEDULE

Field work will start once a landfill disposal permit is obtained for the DU01 soil and this work plan is approved. The work is tentatively scheduled for November/December 2023.

Sincerely,



Barbara E. Lary, RG
Senior Geologist
SCS Engineers

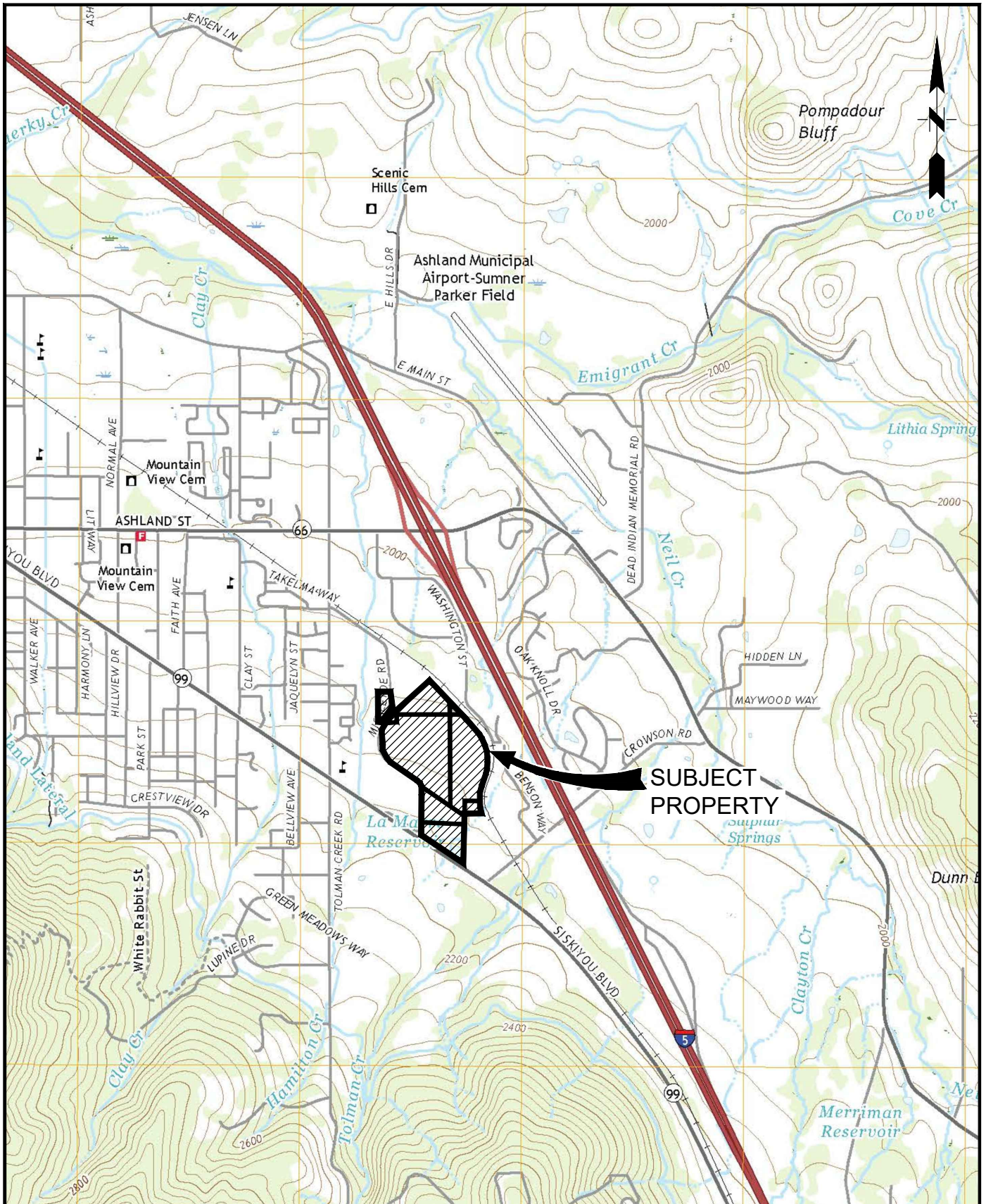


Shane D. Latimer, PhD
VP/Senior Environmental Planner
SCS Engineers

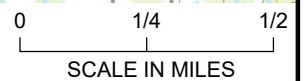
Attachments: Figure 1. Property Location Map
Figure 2. Site Plan
Attachment 1: DEQ NLCI Memo for DU01 soil, November 13, 2023
DEQ SWLOA for DU02 and DU03 soil to Greb Pit, November 15, 2023.

cc: Mike Montero, Montero and Associates
Kory Kaufman, Croman Corporation

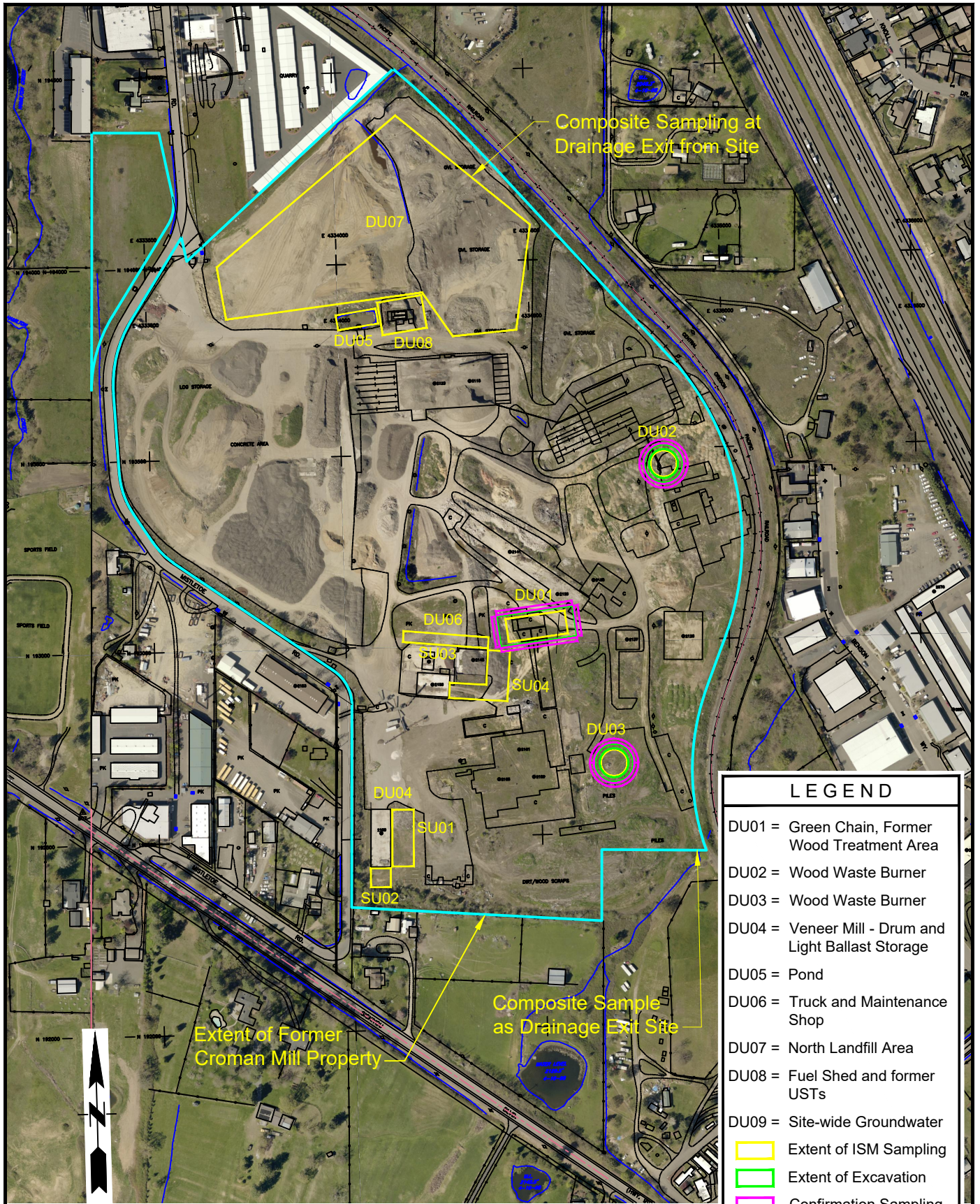
Figures



SOURCE: U.S. Geological Survey, Ashland
7.5-minute topographic quadrangle, 2021



SCS ENGINEERS Environmental Consultants and Contractors 15940 SW 72nd Avenue Portland, Oregon 97224 (503) 639-9201 FAX: (503) 684-6948	PROJECT NO. 04222021.00	DES BY L.E.L.	PROPERTY LOCATION MAP CROMAN PROPERTY 146 MISTLETOE ROAD ASHLAND, OREGON 97520	DATE JUNE 2022
	SCALE AS SHOWN	CHK BY B.L.		FIGURE 1
	CAD FILE FIGURE 1	APP BY S.L.		



LEGEND	
DU01 =	Green Chain, Former Wood Treatment Area
DU02 =	Wood Waste Burner
DU03 =	Wood Waste Burner
DU04 =	Veneer Mill - Drum and Light Ballast Storage
DU05 =	Pond
DU06 =	Truck and Maintenance Shop
DU07 =	North Landfill Area
DU08 =	Fuel Shed and former USTs
DU09 =	Site-wide Groundwater
[Yellow Outline]	Extent of ISM Sampling
[Green Circle]	Extent of Excavation
[Pink Rectangle]	Confirmation Sampling Areas

SCS ENGINEERS
 Environmental Consultants and Contractors
 15940 SW 72nd Avenue
 Portland, Oregon 97224
 (503) 639-9201 FAX: (503) 684-6948

PROJECT NO. 04222021.00	DES BY L.E.L.
SCALE AS SHOWN	CHK BY B.L.
CAD FILE FIGURE 2	APP BY S.L.

SITE PLAN
 CROMAN PROPERTY
 146 MISTLETOE ROAD
 ASHLAND, OREGON 97520

DATE NOV 2023
FIGURE 2

Attachment 1

DEQ NLCI Memo for DU01 soil, November 13, 2023

DEQ SWLOA for DU02 and DU03 soil to Greb Pit, November 15, 2023.

State of Oregon
Department of Environmental Quality

Memorandum

Date: November 13, 2023

To: Project File, Croman Mill, ECSI File #0535
From: Anthony Chavez, Project Manager, WR Cleanup Program
Through: Killian Condon, WR Hazardous Waste Compliance Inspector
Approved: Becky Williams, WR Hazardous Waste Program Manager
Brad Shultz, WR Cleanup Program Manager
Subject: No Longer Contained-In Determination
Croman Mill Site, 146 Mistletoe Road
Ashland, Oregon (ECSI #0535)

DEQ's Western Region Cleanup and Hazardous Waste program staff have prepared this No Longer Contained-In (NLCI) Determination for contaminated soils identified from an investigation at the former Croman Mill, located in Ashland, Oregon. Enrolled in DEQ's Voluntary Cleanup Program, during May 2023, site owners conducted an environmental investigation under a DEQ-approved Work Plan¹. Sampling identified dioxins and furans in surface soils from an area previously used for anti-sapstain wood treatment. Treatment likely used a chlorophenolic product that was applied using a dip tank. Dioxin and furan presence is suspected from drippage onto the ground as treated wood products were transferred from the dip tank to other parts of the site. These soils are therefore listed hazardous waste carrying EPA waste code F032.

This determination is for approximately 600 cubic yards of soil planned for excavation from the former treatment area, measuring approximately 200 feet by 80 feet, and one foot in depth.

Representative sampling was conducted using incremental sampling methodology (ISM) in the area of the former dip tank. The sampling area was determined through interviews with people knowledgeable of the site processes and reviewing of historical aerial photographs. For sampling identification, the area was designated Decision Unit 1 (DU01). The soils were analyzed for SVOCs by USEPA 8270D, RCRA 8 metals by USEPA 6010D, diesel-range hydrocarbons by NWTPH-Dx, and dioxins & furans by EPA 8290A. Results of the analyses are tabulated below, with only the detected compounds listed. Dioxins and furans are listed by their 2,3,7,8-TCDD equivalent. Additionally, two replicates were also collected from DU01.

¹ SCS, 2023. Revised Site Investigation Work Plan, Croman Mill Property, 146 Mistletoe Road, Ashland, Oregon, Oregon DEQ ECSI No. 535, February 25.

Table 1. Sample Results* and Direct Contact of Soil Risk-Based Concentrations (mg/Kg)

Soil Sample	Benzo[a]anthracene	Benzo[b]fluoranthene	Chrysene	Pyrene	2,3,7,8-TCDD equivalent	Arsenic	Chromium
DU01	0.036 J	0.20 J	0.036 J	0.029 J	0.000024	2.3	12 B
DU01 Rep#1	0.022 J	0.170 J	ND	0.020 J	0.000040	2.3	13 B
DU01 Rep#2	0.032 J	0.20 J	0.032 J	0.025 J	0.000021	2.2	11 B
20X TCLP Limit	NA	NA	NA	NA	NA	100	100
Occupational	2.1	21	2,100	23,000	0.000016	1.9	>MAX
Construction Worker	17	170	17,000	7,500	0.00017	15	530,000

* Only detections of F032 listed compounds from 40CFR268.40 are presented here. See findings report for complete analytical results.

B = Compound was found in the blank and sample.

J = estimated concentration above detection limit but below the method reporting limit

mg/Kg = milligram per kilogram

NA = Not Available

ND = not detected above the laboratory method detection limit

>Max = RBC is calculated at greater than 1,000,000 mg/Kg, therefore, deemed not to pose risks in this scenario.

A No Longer Contained-In Determination is needed to show that the soil is not characteristic hazardous waste, that F032-listed compound concentrations are below protective levels, and, if applicable, Land Disposal Requirements (LDRs).

To demonstrate that the soil no longer “contains” hazardous waste, the following conditions need to be met:

- 1) The soil (solid) must not exhibit a characteristic of hazardous waste (must not be reactive or toxic). There are no toxicity limits for the detected semi-volatile organic compounds or dioxins and furans, so no comparison can be made for those constituents. The metals that are detected are all below the 20 times TCLP limit listed above. As such, the soil is not a characteristic waste.
- 2) The soil must not exhibit a characteristic of a hazardous waste (must not be ignitable or corrosive). Based on levels of detections, and knowledge of the process, DEQ has determined that the soil is neither ignitable nor corrosive.
- 3) Concentrations of hazardous constituents from the listed waste must be below health-based levels. It is DEQ’s policy that if soil is to be taken to a lined Subtitle D facility then concentrations of hazardous constituents should be below the DEQ “Occupational” risk-based concentration (RBC) for direct contact. However, on November 6, 2023, a variance was granted by DEQ’s Hazardous Waste program allowing for the use of “Construction Worker” RBCs to screen soils from DU01. (DEQ November 2023). As such, detected F032 constituents are below health-based level RBCs for direct contact of contaminated soil.

4) RCRA land disposal restrictions do not apply because the waste was not removed from the area of contamination prior to this determination.


Underlying contaminants may be present in the soil at concentrations below the minimum reporting levels (MRLs) shown in the laboratory data. Using the MRL concentrations and our knowledge of the process, we can assume the following about the soil:

- It would not be ignitable, corrosive nor reactive;
- Concentrations of underlying constituents would be below toxicity characteristics (for applicable analytes);
- Concentrations of underlying constituents would be below DEQ protective levels (construction worker RBCs).

Based on our review of the data and findings above, DEQ Cleanup has determined that the soil from the former dip tank area (DU01) proposed for excavation and removal at the former Croman Mill site does not exhibit characteristics of hazardous waste. The concentrations of detected F032-listed compounds in soil samples are below DEQ's construction worker risk-based standards. The soil does not pose an unacceptable risk under the waste management scenario proposed. If this soil is disposed of at a permitted Subtitle D landfill DEQ has approved for this purpose, the waste will no longer contain hazardous waste. If the waste is not managed and disposed of in accordance with these conditions of approval, this No Longer Contained-In Determination does not apply: the waste remains hazardous waste and must be managed and disposed of in compliance with applicable hazardous waste laws.

Oregon DEQ Contained In Determination Approval Signoff Sheet

Site Name: Former Croman Mill
Location: 146 Mistletoe Road, Ashland
Media: Soil
Approved Disposal: Dry Creek Landfill, Eagle Point – Subtitle D

DEQ Project Manager:  Date: 11/13/2023
Anthony Chavez

DEQ HW Staff:  Date: 11/13/2023
Killian Condon

DEQ HW/MM Program Manager: Becky Williams Date: 11/14/2023
Becky Williams

DEQ Cleanup Program Manager: Brad Shultz Date: 11/14/23
Brad Shultz



Oregon

Tina Kotek, Governor

Department of Environmental Quality
Western Region Eugene Office
165 East 7th Avenue, Suite 100
Eugene, OR 97401
(541) 686-7838
FAX (541) 686-7551
TTY 711

Nov. 15, 2023

John Holmes
Southern Oregon Rock LLC
PO Box 1347
Jacksonville, OR 97530

RE: Solid Waste Letter Authorization
Greb Pit X
SWLA # 1748
Jackson County

Dear Mr. Holmes:

The attached Solid Waste Letter Authorization Permit 1744 is issued in response to your application received on Aug. 14, 2023. You are urged to carefully read the letter authorization and comply with its conditions. The authorization is valid for six months, until **May 14, 2023**.

This authorization has been issued to allow the disposal of contaminated soils as a mine reclamation fill material as denoted in the *Fill Placement Plan* dated April 25, 2017, at the plan denoted Greb Pit. This authorization is being issued as a 6-month limited duration interim permit. This authorization is renewable one time for a period not to exceed 6 months. As this is a Department of Geology and Mineral Industries permitted site, you must ensure that this placement is consistent with the site Imported Fill Plan prior to accepting this material.

If you have any questions, please contact Seth Sadofsky at 541-687-7329 or at seth.sadofsky@deq.oregon.gov. For more information on DEQ's Materials Management Program including rules, statutes and technical assistance visit <https://www.oregon.gov/deq/mm/swpermits/Pages/default.aspx>.

Sincerely,

Becky Williams

Becky Williams, Manager
Hazardous and Solid Waste Program
Western Region

ec: Barbara Lary, blary@scsengineers.com
ECSI file 535 c/o Anthony Chavez, DEQ Eugene anthony.chavez@deq.oregon.gov
Montero-associates@charter.com



SOLID WASTE DISPOSAL SITE PERMIT: Letter Authorization

Oregon Department of Environmental Quality
165 E. Seventh Ave., Suite 100
Eugene, OR 97401-3049
541-687-7465

Issued in accordance with the provisions of [Oregon Revised Statute Chapter 459](#) and subject to the Land Use Compatibility Statement referenced below.

Issued to:

Southern Oregon Rock, LLC
PO Box 1347
Jacksonville, OR 97530
541-899-4494

Property Owner:

T Greb Properties LLC
3415 Brophy Rd
Eagle Point, OR 97524

Facility name and location:

Greb Pit X
528 Linn Road
Eagle Point, OR 97524
Jackson County

Operator:

Southern Oregon Rock, LLC
PO Box 1347
Jacksonville, OR 97530

John Holmes
541-899-4494 tara@johnnycatinc.com

ISSUED IN RESPONSE TO:

- Application for Solid Waste Letter Authorization dated Aug. 14, 2023
- Land Use Compatibility Statement, dated May 5, 2017, from the Jackson County Planning Department

Pursuant to [OAR 340-093-0060](#) the determination to issue this permit is based on findings and technical information included in the permit application record.

ISSUED BY THE OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

Becky Williams

Nov. 14, 2023

Becky Williams, Manager
Western Region Materials Management
Permitting and Compliance

Date

PERMITTED ACTIVITIES

A. Description

This Solid Waste Letter Authorization covers the acceptance and placement of contaminated soils removed solely from a distinct parcel located in Ashland, Jackson County. This site being specifically denoted by the Jackson County Assessor's Office as follows: Section 14D, Township 38 South, Range 1 East, Tax Lot 1301 and 1100. Soils at this site are contaminated with low concentrations of dioxins and furans. This soil will not pose a risk to public health or ecological receptors if managed as outlined in the application.

Mine reclamation fill activities will occur at 528 W Linn Road in Eagle Point, Oregon, Jackson County (also known as Map and Tax Lot 100 of 36S 1W 04). Up to 1500 cubic yards of material will be placed in the fill area. Upon receipt, the contaminated soil will be placed directly into the DOGAMI approved (DOGAMI ID# 15-0098) fill placement area as denoted in the "Fill Placement Plan", Section 1.3 and Figure 3.

No buildings, tanks or additional infrastructure development/construction is planned.

B. Site Operation Plans

Mine reclamation fill operations shall be in accordance and in keeping with all of allowances and restrictions denoted in the following: DOGAMI Operating Permit, Solid Waste Letter Authorization Permit Application, "Fill Placement Plan", "Soil Management Plan", Land Use Compatibility Statement, "Jackson County Planning and Development Services Aggregate Resource Site Plan Review", this Solid Waste Letter Authorization, and all other associated plans and information provided by applicant and approved by appropriate jurisdictional authorities.

Site operations and plans shall be modified as necessary, to maintain a high level of protection to human health, the environment and to minimize nuisance conditions. All operational changes and plan modifications will be submitted to the department for approval prior to implementation. In the event of immediate operational changes necessary to protect human health, the environment or process integrity, notification will be as soon as practicable and in no circumstances later than 72 hours. A record of daily activities is to be maintained in a Site Operational Log.

The soils placed under this permit must be placed above the seasonally-high water table, covered with a geotextile demarcation layer and 3 feet of clean fill the top of the placed soils below planned final grade.

C. Prohibited Materials, Unknown Materials, and Suspected Hazardous Materials

If the permittee discovers any materials not specifically allowed by this Letter Authorization, once safe to do so, the permittee will segregate those materials, store them in a manner that safeguards human health and the environment, notify DEQ of the discovery, and properly dispose or recycle the materials. These materials may include but are not limited to the following: metals, waste tires, pressurized cylinders, plastics, bio-sludge and/or human bodily wastes, medical/pharmaceutical waste, PCBs, animal mortality waste, animal processing waste, appliances/electronic devices, treated/painted wood waste, and all hazardous waste as defined in [40 CFR 261](#). Unknown materials and suspected hazardous materials will require a hazardous waste determination. Contact the Western Region Solid Waste Permit Coordinator at 541-687-7465 to obtain assistance with hazardous waste determinations.

D. Disclaimers

The issuance of this permit does not convey and property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights.

DEQ, its officers, agents or employees do not sustain any liability on account of the issuance of this permit or on account of the construction, maintenance, or operation of facilities pursuant to this permit.

E. Authority and Regulatory

All site operations must be conducted in a manner to protect public health and the environment. Conditions of this permit are binding upon the permittee. The permittee is liable for all acts and omissions of the permittee's contractors and agents [[ORS 459.376](#)].

The permittee shall allow representatives of DEQ access to the disposal facility at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data and carrying out other necessary functions related to this permit.

Issuance of this permit does not relieve the permittee from the responsibility to comply with all other applicable federal, state or local laws or regulations. This includes the following solid waste requirements, as well as all updates or additions to these requirements:

- a) Solid Waste Letter of Authorization Permit Application received Aug. 14, 2023
- b) Oregon Revised Statutes, Chapters [459](#) and [459A](#)
- c) [Oregon Administrative Rules, Chapter 340](#)
- d) Any other documents submitted by the permittee and approved by DEQ

F. Notification

The permittee shall notify DEQ in writing (email is acceptable) of the start date and the completion date of the project. Any and all process "upsets," emergency conditions, spills and releases, and discovery of unknown or hazardous materials will be reported to DEQ as soon as practicable. The permittee shall notify DEQ of all complaints resulting from site operations (i.e., odor, vector, dust, noise) and actions taken to address those complaints within 72 hours of the complaint being lodged. All notifications will be logged into the Site Operational Log. The Site Operational Log is a reviewable document during site inspections and will be made available to DEQ, if requested, as part of the document review portion of site inspections.

Submit all notifications, correspondence and reports to the Western Region Solid Waste Permit Coordinator at: 165 E. Seventh Ave., Suite 100, Eugene, OR 97401, 541-687-7465.

G. Expiration

Solid Waste Letter of Authorization No. 1748 expires six months from the signature date of this permit and can be renewed once for an additional six months at a cost of \$500.00.

Following expiration of this permit a report shall be submitted to DEQ within 30 days outlining the start and end date of soil placement and how the soils have been covered.