

2012 Environmental Audit Report - Final Pacific Wood Preserving of Oregon Sheridan, Oregon

Prepared for:

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Sheridan, Oregon 97378

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CITATION

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Pacific Wood Preserving of Oregon, Inc.
Prepared by Belunes Consulting, Inc.
Scappoose, Oregon 97056

CERTIFICATION

ENVIRONMENTAL PROFESSIONAL'S APPROVAL

The technical materials contained in this document were prepared under the supervision and direction of the undersigned, whose seal, as a registered environmental professional, is affixed below.



Expires October 31, 2013

March 8, 2013

Terrence E. Belunes, RG, LHG

Date

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- A. MatCon Asphalt Cap Supporting Information
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ACRONYMS AND ABBREVIATIONS

BMP	best management practice
CAA	Clean Air Act
CFR	Code of Federal Regulations
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
CFR	Code of Federal Regulations
COO	Chief Operating Officer
CuNap	copper naphthenate
CWA	Clean Water Act
ECSI	Environmental Cleanup Site Information
EES	Easement and Equitable Servitude
EHS	Environmental, Health and Safety
FIFRA	Federal Insecticide, Fungicide and Rodenticide Act
GAC	granular activated carbon
gpd	gallons per day
gpm	gallons per minute
HAP	Hazardous Air Pollutant
HR	Human Resources
IDW	investigation-derived waste
LQG	Large-Quantity Generator
n.a.	No action required
NAICS	North American Industrial Classification System
NPDES	National Pollutant Discharge Elimination System
OAR	Oregon Administrative Rule
O&M	operation and maintenance
ODEQ	Oregon Department of Environmental Quality
ODOT	Oregon Department of Transportation
OMP	Operation and Maintenance Plan
penta	pentachlorophenol
PPA	Prospective Purchaser Agreement
ppb	parts per billion
psi	pounds per square inch
PWP	Pacific Wood Preserving
PWPO	Pacific Wood Preserving of Oregon
RBC	risk-based concentration
RCRA	Resource Conservation and Recovery Act
SAA	Satellite Accumulation Area
SIC	Standard Industrial Classification
SMP	Soil Management Plan
SMR	Soil Management Report
SPCC Plan	Spill Prevention Control and Countermeasure Plan
SWTS	Storm Water Treatment System
TEQ	total equivalent
TPH	total petroleum hydrocarbon
TLT	Taylor Lumber and Treating
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
ug/l	microgram per liter
VOC	volatile organic compound
WWTS	waste water treatment system

EXECUTIVE SUMMARY

The Pacific Wood Preserving of Oregon (PWPO) facility in Sheridan, Oregon, manufactures treated wood products, including transmission poles, telephone and utility poles, distribution poles, dimensional lumber, laminated beams and fence posts. The PWPO facility is the location of the former Taylor Lumber and Treating (TLT) site, which was remediated by the U.S. Environmental Protection Agency (USEPA) and Oregon Department of Environmental Quality (ODEQ) after contaminants associated with historical wood treatment preservatives were discovered in the soil and groundwater of the site.

PWPO acquired the TLT site in 2002 pursuant to two prospective purchaser agreements (the Agreements): one between PWPO and USEPA and the other between PWPO and ODEQ. Under the Agreements, in exchange for releasing PWPO from all liability associated with the historical TLT contamination, PWPO agreed to operate and maintain several critical components of the final remedy for the TLT site. The Agreements were amended in May 2011 to remove the restriction on treatment with pentachlorophenol and to account for various changes at the facility, including modifications to the remedy and updated operation and maintenance requirements.

Note that TLT constructed a portion of the storm water treatment system (SWTS) on land owned by the Oregon Department of Transportation (ODOT). PWPO is currently in negotiations with ODOT for the purchase of this land and expects the transaction to be completed in 2013.

The Amended Agreements require PWPO to submit to USEPA and ODEQ an annual environmental audit report for the facility by February 1 of the following year. The Revised Statement of Work, Exhibit 3A to the Amended Agreements, sets forth the requirements for the annual report. This document represents the second annual environmental report prepared for the facility. At the request of ODEQ a section on long-term protections was added to the annual environmental audit report.

1 INTRODUCTION

1.1 PURPOSE

The purpose of this 2012 Environmental Audit Report is to provide an overview and summary of actions taken by Pacific Wood Preserving of Oregon (PWPO) to comply with the terms of the Amended Agreements and with the various regulatory programs under which the facility operates. This Environmental Audit Report is organized as follows:

- Section 1 - Introduction
- Section 2 - TLT Superfund Site O&M Activities
- Section 3 - Compliance with Applicable Environmental Laws
- Section 4 - Compliance with Institutional Controls
- Section 5 - Letter, Plans, and Reports
- Section 6 - Conclusions
- Section 7 - References

1.2 FACILITY INFORMATION

Table 1 presents relevant information about the PWPO facility.

Table 1: Facility Information

Facility Owner/Operator	Pacific Wood Preserving of Oregon
Physical Address	22125 Southwest Rock Creek Road, Sheridan, Oregon 97378
Mailing Address	P.O. Box 40, Sheridan, Oregon 97378
County	Yamhill
EPA CERCLIS No	ORD009042532
EPA Region	10
ECSI ID	666
Topographic Map	T5S-R6W-S34, Oregon Quadrangle, 7.5-Minute Series
Latitude	45 05' 50.0" North
Longitude	123 25' 37" West
Reference Point	Southeast corner of the largest facility building, as depicted on the USGS topographic map
Is the facility located in Indian Country?	No
Is the facility a Federal Facility?	No
Facility SIC Codes	2491
Facility NAICS Code	321114

Note: CERCLIS = Comprehensive Environmental Response, Compensation and Liability Information System, ECSI = Environmental Cleanup Site Information, USGS = U.S. Geological Survey, SIC = Standard Industrial Classification, NAICS = North American Industry Classification System.

1.3 DISTRIBUTION LIST

The names and responsibilities of key project personnel involved with the preparation of this Environmental Audit Report for the PWPO facility are listed in Table 2, which constitutes the distribution list for this Environmental Audit Report.

Table 2: Distribution List

Name	Role	Email Address
Karen Keeley	USEPA Remedial Project Manager	keeley.karen@epa.gov
Norm Read	ODEQ Project Manager	read.norm@deq.state.or.us
Elaina Jackson	President and COE, PWP Companies	elaina.jackson@pacificwood.com
Roland Mueller	Director of HR and EHS Compliance	roland.mueller@pacificwood.com
Mike Richardson	Plant Manager, PWPO	michael.richardson@pacificwood.com
Tom Baker	EHS Supervisor, PWPO	tom.baker@pacificwood.com
Tom Lindley	Attorney representing PWPO	TLindley@perkinscoie.com
Priscilla Hampton	Attorney representing PWPO	phampton@perkinscoie.com
Terrence E. Belunes, RG, LHG	Project Manager, PWPO Consultant	terrence@belunes-consulting.com

Note: COO = Chief Operating Officer, HR = Human Resources, EHS = Environmental Health and Safety.

1.4 BACKGROUND INFORMATION

This section summarizes PWPO's operations, existing contamination, and regulatory agreements, and the contents of the annual environmental audit report.

1.4.1 Pacific Wood Preserving of Oregon Operations

Located in Sheridan, Oregon (Figure 1), the PWPO facility currently manufactures wood products treated with "general use" preservatives, and the "restricted use" preservative pentachlorophenol (penta). Treated wood products include transmission poles, telephone and utility poles, distribution poles, dimensional lumber, laminated beams, and fence posts. Water-borne "general use" preservatives include ACQ Preserve® and borates. Oil-borne preservatives include the "general use" preservative copper naphthenate (CuNap) and the "restricted use" preservative penta. The facility consists of the treatment plant and white pole storage yard areas (Figure 2).

In June 2011, PWPO began treating with penta by shipping penta concentrate to the site. PWPO is currently producing penta concentrate at the Sheridan facility from block penta. To produce penta concentrate, block penta is dissolved in the block dissolver process area, which became operational on October 25, 2011. The block dissolver process area is located adjacent to the parts shed and is shown on Figure 3. Because of the number of new tanks required to produce penta concentrate and work solution, most of the former parts shed has been converted into an extension of the north tank farm. The co-solvent, mix tank, and batch tank are contained in the new tank farm.

Bulk penta is shipped to the facility in 2,000-pound blocks by truck and stored in the old shop, dry shed, or block dissolver process area (Figure 3). The penta blocks are wrapped in an inner plastic bag and an outer primary containment bag made of polyethylene.

1.4.2 Existing Contamination

As a result of poor housekeeping practices, the TLT site was listed on USEPA's National Priorities List on June 14, 2001. USEPA completed the Remedial Investigation and Feasibility Study in May 2005. USEPA's final remedy for the TLT site included an underground vertical barrier wall around—and a low permeability MatCon asphalt cap over—historical existing contaminated soils and groundwater in the vicinity of the treatment plant. A groundwater extraction system also was installed to maintain groundwater inside the barrier wall below the level of the wall and to protect the integrity of the MatCon asphalt cap. The remedy is designed to prevent precipitation and storm water from coming into

contact with the remaining historical contamination at the site. Following remediation, ODEQ assumed responsibility for all operation and maintenance activities associated with the site remedy.

1.4.3 Regulatory Agreements

PWPO acquired the assets of the TLT bankruptcy in 2002. On February 4, 2002, prior to purchasing the TLT site, PWPO entered into an Agreement and Covenant Not To Sue with USEPA (EPA Docket CERCLA-10-2002-0034), which provides, among other terms, both a covenant not to sue and third-party contribution protection from any claim or liability associated with existing contamination (as defined in paragraph 8.b of the Agreement). The Agreement also restricted the use of historical treatment chemicals, including penta. On February 5, 2002, PWPO and the ODEQ entered into a State Prospective Purchaser Agreement (PPA) (DEQ Docket No. 02-03) that included similar protections and restrictions. The USEPA and ODEQ agreements are collectively referred to as "the Agreements."

Under the Agreements, in exchange for releasing PWPO from all liability associated with existing contamination, PWPO agreed to operate and maintain several critical components of the final remedy for the TLT site. The Agreements were amended in May 2011 (USEPA 2011, ODEQ 2011) to account for various changes at the facility, including modifications to the remedy, updated operation and maintenance requirements, and removal of the restriction on use of penta at the facility. The Amended Agreements require PWPO to perform the following tasks:

- Perform operations and maintenance of the MatCon asphalt cap, groundwater extraction system, and storm water collection and treatment system
- Prepare and implement a USEPA- and ODEQ- approved plan for best management practices (BMPs)
- Record an Easement and Equitable Servitude requiring implementation of institutional controls as set forth in the 2005 Record of Decision
- Prepare and submit to USEPA and ODEQ an annual environmental audit report

1.5 CONTENT OF THE ANNUAL ENVIRONMENTAL AUDIT REPORT

As established in the Revised Statement of Work (Exhibit 3A to the Amended Agreements), this second Annual Environmental Audit Report describes and summarizes the following:

- Compliance with requirements of the Resource Conservation and Recovery Act (RCRA)
- Site-specific National Pollutant Discharge Elimination System (NPDES) permit issued by Oregon DEQ, including a brief summary of Discharge Monitoring Reports and inspection records of the storm water treatment system (SWTS)
- Violations of state and federal environmental laws and regulations
- Actions taken to address violations, if any
- The facilities' Spill Prevention Control and Countermeasures (SPCC) Plan and reportable quantity of spills of product or waste and actions taken to address those spills
- Results of operation and maintenance (O&M) activities required in Tasks A and B, and C [of the Revised Statement of Work], including all inspection forms and any supporting documentation and photographs
- Documentation of offsite disposal of filter cake from the SWTS
- Documentation of offsite disposal of sediment/sludge removed from site trench drains
- Supporting documentation and photographs

2 TLT SUPERFUND SITE O&M ACTIVITIES

The Amended Agreements require PWPO to perform operation and maintenance of the:

- MatCon asphalt cap
- Groundwater extraction system
- Storm water collection and treatment system

Activities related to the MatCon asphalt cap for the 2012 calendar year are summarized below.

2.1 MATCON ASPHALT CAP O&M ACTIVITIES (SECTION A OF THE REVISED STATEMENT OF WORK)

2.1.1 USEPA Five-Year Review

In 2012 USEPA conducted its first 5-year review of the Taylor Lumber and Treating Superfund site remedy. The 5-year review a site visit was conducted on April 27, 2012. Present at the site visit were:

- Karen Keeley, Remedial Project Manager, USEPA Region 10
- Norm Read, Project Manager, ODEQ
- Terry Petko (former Director of HR and EHS, PWP) and Roland Mueller, (current Director of HR and EHS, PWP)
- Terrence E. Belunes, RG, LHG, Belunes-Consulting, Inc. (PWPO consultant)

The completed EPA 5- year review can be found at:

http://www.epa.gov/region10/pdf/sites/taylor_lumber/first-5-year-review-taylorlumber_5-15-12.pdf

The findings of the EPA's 5-year review are summarized in the report's executive summary as follows:

The remedy at the Taylor Lumber and Treating Superfund Site is protective of human health and the environment. Remedial action construction is complete, the remedy is functioning as intended, and exposure pathways that would result in unacceptable risks are being controlled by restrictive covenants and other institutional controls.

During the site visit walk, USEPA noted several items requiring action by PWPO. The items and the corresponding section of this report that describes the actions taken by PWPO are presented in Table 3.

Table 3: Findings and Actions Required During 5-Year Review

<u>Item/Action Required</u>	<u>Section of Report</u>
Depressions in MatCon asphalt cap, SE quadrant	2.1.4
2012 Annual Inspection	2.1.2
Slurry wall marking	2.1.5.1
Assessment by Jerry Thayer of impact to cap from accumulation of soil/woody debris	2.1.2
Soil staining south of peeler	4.1.2
Final BMP Plan	5.1
Tank integrity test result	3.2.2.4
Final 2012 Environmental Audit Report	This document

2.1.2 2012 MatCon Asphalt Cap Annual Inspection

The annual inspection of the MatCon asphalt cap was conducted on August 6, 2012. Present at the inspection were:

- Jerry Thayer, MatCon, Inc.
- Mark Bauer, Baker Rock
- Norm Read, Project Manager, ODEQ
- Tom Baker (EHS Supervisor, PWPO) and Dan Winkle (former Plant Manager, PWPO)
- Terrence E. Belunes, RG, LHG, Belunes-Consulting, Inc. (PWPO consultant)

The general overall condition of the cap was noted to be satisfactory and no actions were required as a result of the inspection. PWPO noted that the cap continues to soften during high-temperature days, making the cap susceptible to indents and depressions from dunnage loads and site operations (forklift gouges). However, no lasting damage to the cap was noted by Mr. Thayer.

Log storage and other operations at the facility result in woody debris being deposited on the cap. Mr. Thayer noted that "large quantities of woody debris may actually cushion the MatCon asphalt cap surface and prevent damage," and that if penetration of the cap occurred, "the resulting damage could easily be repaired in accordance with the O&M Plan." Mr. Thayer concluded that "potential damage from woody debris is considered to be minimal and within the intent of the reuse features of a MatCon Cap."

To define "damage" that PWPO is required to repair, Mr. Thayer provided the following definition:

Any damage that exceeds $\frac{3}{4}$ " in depth below the normal surface elevation surrounding the damaged area with rough edges that would indicate the area has been gouged should be repaired. Smooth depressions are not considered to need repair unless they extend more than 1" below the normal surface elevation surrounding the damaged area.

All agreed that the definition will be added to the Operations and Maintenance Plan. A copy of the 2012 MatCon Annual Inspection Report and the MatCon Operation and Maintenance Plan (Revision 5) are presented in Appendix A.

2.1.3 Routine Inspections

Weekly routine (informal) inspections of the MatCon asphalt cap were conducted by a qualified person, the Environmental Health and Safety (EHS) Supervisor or his designee, as required by Table 1 of the Revised Statement of Work. 2012 Asphalt Weekly Inspection Checklists are included in Appendix A. Repairs to the MatCon asphalt cap were also documented on the Corrective Action Forms, Appendix B. A summary of the observations made during these weekly inspections is presented in Table 4.

Table 4: Summary of Weekly MatCon Asphalt Cap Inspections

Month	Observation	Action
January	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
February	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
March	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
April	<ul style="list-style-type: none"> Inspected as scheduled 23rd – Re-repair of patch made in 2011 30th – Repair forklift gouges 	<ul style="list-style-type: none"> 23rd - See Corrective Action Form #07-12. 30th - See Corrective Action Form #08-12.
May	<ul style="list-style-type: none"> Inspected as scheduled 11th – Dents in MatCon asphalt cap from carts 18th – Repair five indents in cap 30th – Re-repair two previously repaired dents/divets 	<ul style="list-style-type: none"> 11th - See Corrective Action Form #09-12. 18th - See Corrective Action Form #11-12. 30th - See Corrective Action Form #12-12.
June	<ul style="list-style-type: none"> Inspected as scheduled 1st – Repair three locations 15th - Diesel spill on MatCon asphalt cap 25th – Three dents 	<ul style="list-style-type: none"> 1st - See Corrective Action Form #13-12. 15th - See Corrective Action Form # 16-12. 25th – Repaired.
July	<ul style="list-style-type: none"> Inspected as scheduled 3rd – Repair two impressions in cap by shop 16th – Blister cracks south of south tank farm, between boiler and old shop 	<ul style="list-style-type: none"> 3rd - See Corrective Action Form #17-12. 16th - See Corrective Action Forms #18-12 and #19A-12 Also see Corrective Action Form #20-12 for repairs made July 25, 2012
August	<ul style="list-style-type: none"> Inspected as scheduled 6th – Fork marks in MatCon asphalt cap 	<ul style="list-style-type: none"> 6th – See Corrective Action Form #21-12
September	<ul style="list-style-type: none"> Inspected as scheduled 20th – Gouge in MatCon asphalt cap 	<ul style="list-style-type: none"> 20th – See Corrective Action Form #22-12
October	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a
November	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a
December	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.

2.1.4 Minor Repairs

As noted in Table 4, several minor repairs to the MatCon asphalt cap were made in 2012 as a result of the routine inspection of the MatCon asphalt cap.

In addition to minor repairs made by PWPO, Mr. Thayer, of MatCon, Inc., made repairs to two gouges identified in the USEPA’s 5-year review on May 1, 2012. Mr. Thayer documented his repairs in a May 15, 2012, PWPO MatCon Cap Repair Report, Appendix A.

2.1.5 Major Repairs

No major repairs to the MatCon asphalt cap were made in 2012.

2.1.6 Routine Maintenance

This section discusses the routine maintenance of the MatCon asphalt cap, as described in Table 1 of the Revised Statement of Work that PWPO conducted in 2012.

2.1.6.1 “Street Sweeping” Activities

Item 19 in Table 1 of the Revised Statement of Work requires PWPO to conduct “street sweeping” of the MatCon asphalt cap to remove gravel and other debris, as needed and annually. To facilitate cleaning of the cap, PWPO acquired a Bobcat with a sweeper attachment in September 2011. Since its purchase, PWPO has been conducting sweeping of the MatCon asphalt cap on a weekly basis. A log of sweeping activities is included in Appendix A.

2.1.6.2 Pavement Striping and Lettering

Item 17, Table 1 of the Revised Statement of Work requires PWPO to maintain pavement (MatCon asphalt cap) striping and lettering “as required.” In October 2011, PWPO first applied new striping over the center of the vertical barrier wall and applied new lettering stating “Centerline Barrier Wall” and “Verify Requirement Before Digging” approximately every 100 feet along the centerline. New striping was applied again in August 2012. A photograph of the striping and lettering is included in Appendix A.

2.1.6.3 Spill Cleanup Activities

Several spills occurred on the MatCon asphalt cap in 2012. Section 2.4.1.3 presents details regarding the discovery and cleanup of these releases.

2.1.7 Compliance Assessment

PWPO is in compliance with the requirements for MatCon asphalt cap O&M activities as described in Section A of the Revised Statement of Work.

Routine inspections of the MatCon asphalt cap are conducted weekly and are effective in noting stresses to the cap that may reduce its ability to function as intended. PWPO personnel are aware of the important role the cap performs as part of USEPA’s remedy for the site and are diligent in the performance of the inspections. Repairs to the cap are completed in a timely manner (i.e., within 7 days of discovery) as required by Table 1 of the Revised Statement of Work.

2.2 GROUNDWATER EXTRACTION SYSTEM O&M ACTIVITIES (SECTION B OF THE REVISED STATEMENT OF WORK)

2.2.1 Routine Inspections

Routine, informal inspections of the groundwater extraction system are made weekly. The inspections are conducted by a qualified person, the EHS supervisor or his designee, as required by Table 1 of the Revised Statement of Work. Copies of the 2012 Groundwater Extraction System Weekly Inspection Checklists are included in Appendix C. A summary of the observations made during these weekly routine inspections is presented in Table 5.

Table 5: Summary of Weekly Groundwater Extraction System Inspections

Month	Observation	Action
January	<ul style="list-style-type: none">• Inspected as scheduled• No exceptions	<ul style="list-style-type: none">• n.a.
February	<ul style="list-style-type: none">• Inspected as scheduled• No exceptions noted	<ul style="list-style-type: none">• n.a.
March	<ul style="list-style-type: none">• Inspected as scheduled• No exceptions	<ul style="list-style-type: none">• n.a.
April	<ul style="list-style-type: none">• Inspected as scheduled• No other exceptions noted	<ul style="list-style-type: none">• n.a.
May	<ul style="list-style-type: none">• Inspected as scheduled• No exceptions	<ul style="list-style-type: none">• n.a.
June	<ul style="list-style-type: none">• Inspected as scheduled• No exceptions	<ul style="list-style-type: none">• n.a.
July	<ul style="list-style-type: none">• Inspected as scheduled• No other exceptions noted	<ul style="list-style-type: none">• n.a.
August	<ul style="list-style-type: none">• Inspected as scheduled• No exception.	<ul style="list-style-type: none">• n.a.
September	<ul style="list-style-type: none">• Inspected as scheduled• No exceptions	<ul style="list-style-type: none">• n.a.
October	<ul style="list-style-type: none">• Inspected as scheduled• No exceptions	<ul style="list-style-type: none">• n.a.
November	<ul style="list-style-type: none">• Inspected as scheduled• No exceptions	<ul style="list-style-type: none">• n.a.
December	<ul style="list-style-type: none">• Inspected as scheduled• No other exceptions	<ul style="list-style-type: none">• n.a.

As part of the weekly inspections, PWPO collects information to calculate the flow rate from each extraction well using the methodology attached to the original Agreement (USEPA 2002). The Amended Agreements modified this methodology slightly. This information includes the volume of water collected in the time required for the pump to complete three cycles, which is used to calculate the flow rate of each pump.

The average calculated flow rate of each extraction well is presented in Table 6.

Table 6: Average Extraction Well Flow Rates

Extraction Well	Average flow (gpm*)
PW-1	0.62
PW-2	0.35
PW-3	0.52
PW-4	0.23

* gpm = gallons per minute

A tabulated summary of the weekly flow rates of each extraction well is presented in Appendix C.

2.2.2 Routine Maintenance

No repairs to the extraction wells were made in 2012.

2.2.3 Compliance Assessment

PWPO is in compliance with the requirements for groundwater extraction system O&M activities as described in Section B of the Revised Statement of Work.

PWPO has performed inspections of the groundwater extraction system as specified in Table 2 of the Revised Statement of Work.

A review of the extraction well flow rate data shows that the pumps are functioning properly.

2.3 SWTS O&M ACTIVITIES (SECTION C OF THE REVISED STATEMENT OF WORK)

The treatment system consists of the following components, which are shown on Figure 4:

- Conveyance system
- Oil/water separator and wet well system
- Storage system
- Sedimentation system
- Filtration system
- Granular activated carbon system

No changes in the SWTS components occurred in 2012.

PWPO conducts annual and routine inspections of these conveyance and treatment system components to ensure proper functioning of the SWTS.

Note that a portion of the land occupied by the SWTS components is owned by the Oregon Department of Transportation (ODOT) (see Figure 4). PWPO is currently in negotiations with ODOT for the purchase of this land and expects the transaction to be completed in 2013.

2.3.1 Annual SWTS Inspection and Cleanout

PWPO conducted an annual SWTS inspection and cleanout during the dry season, between August and October 2012. To facilitate the documentation of the annual cleanout, the SWTS OMP (BCI 2011a) includes several checklists to record the activities conducted during the cleanout. Appendix D includes a copy of the completed 2012 Storm Water Treatment System Annual Inspection Checklists for the conveyance system, pumps, and tanks.

2.3.1.1 Conveyance System

The condition of the conveyance system components (i.e., catch basins, French drains, drainage ditches, and manhole) were inspected in April, July, and August 2012. Debris, sediment, or other obstructions were removed from the trench basins and catch basins as needed. All components of the conveyance system were observed to be operating properly.

Debris and sediments from the French drains and catch basins were placed in 55-gallon drums and managed as F032 waste. Photographs documenting the cleanout of storm water conveyance system components and manifests of sediment/debris disposal are presented in Appendix D.

2.3.1.2 Pumps

Pumps are an integral part of the SWTS and include wet well, sedimentation system low-flow and high-flow transfer pumps (T-1 and T-2), and filtration system low-flow and high-flow transfer pumps (T-3 and T-4). Annual inspection and maintenance activities for pumps are discussed below.

2.3.1.2.1 Wet Well Pumps

Bearings and impellers on the wet well pumps were inspected in August as part of the annual preventative maintenance program. Neither the bearings nor the impellers required replacement or servicing.

2.3.1.2.2 Transfer Pumps T-1 and T-2

Bearings and impellers on the T-1 and T-2 transfer pumps were inspected in August as part of the annual preventative maintenance program. Neither the bearings nor the impellers required replacement or servicing. T-1 bearings are greased weekly; T-2 bearings are greased quarterly.

2.3.1.2.3 Transfer Pumps T-3 and T-4

Bearings and impellers on the T-3 and T-4 transfer pumps were inspected in August 2012 as part of the annual preventative maintenance program. Neither the bearings nor the impellers required replacement or servicing. T-3 bearings are greased weekly; T-4 bearings are greased quarterly.

2.3.1.3 Tanks

The condition of the following tanks was inspected and cleaned out during the annual cleanout.

- 500,000-gallon storage tank
- Oil/water separator and wet well
- Mix tanks (two)
- Sedimentation tanks (four)
- Surge tank
- Backwash tank
- Filter bag vessels (five)
- Granular activated carbon (GAC) vessels (two)

A brief description of the clean-out activities for each of these tanks is discussed below.

2.3.1.3.1 500,000-Gallon Storage Tank

The 500,000-gallon tank was cleaned out in July 2012. Accumulated storm water in the tank was run through the storm water treatment process prior to the start of the inspection and cleanout of the tank. The approximate sediment depth in the tank was 6 inches. These sediments were removed from the storage tank by vacuum truck, transferred to a sedimentation tank, and dewatered at the filter press. Photographs documenting the cleanout of the 500,000-gallon storage tank are presented in Appendix D.

The inside of the tank was then pressure-washed and inspected. No evidence of cracks or excessive corrosion was observed on the tank. The foundation of the tank was found to be free of cracks and voids, and the liquid level float, gauge board, alarm strobe, and valves were in proper operating order.

Annual inspection of the 500,000-gallon tank includes observations of the conditions of the following tank components: foundation, shell, fittings, external gauge, and ladder. All tank components were found to be in good condition and no repairs were made.

2.3.1.3.2 Oil/Water Separator and Wet Well

The oil/water separators were cleaned out in August 2012 by first removing and cleaning the coalescing plates. The coalescing plates were removed by forklift, contained on a plastic liner on a truck bed, and transferred to drip pads where they were pressure-washed to remove oil and other materials that had accumulated on the plates. Debris and sediment that had accumulated in the oil/water separator vault were removed by vacuum truck, transferred to a sedimentation tank, and processed via the filter press. Photographs documenting the cleanout of the oil/water separator are presented in Appendix D.

Inspection of the wet well is not part of the annual inspection. To conduct such an inspection would require removal of the low-flow and high-flow pumps and associated piping, which is not practicable.

At the time this report was prepared, the wet well pumps, float, control panel, and valves were in proper operating order.

2.3.1.3.3 Mix Tanks

As part of the annual inspection, the rapid and slow mix tanks were emptied and inspected in April and September, 2012, respectively. No sediments were noted in the tanks. (See the photograph log in Appendix D.) No significant corrosion or deterioration of the tanks was noted. Bearings in the mixers of both tanks were replaced at the time of the inspections.

As part of the annual preventative maintenance of the tanks, the oil in the gear boxes of rapid and slow mix tank's mechanical mixer was changed in April and September 2012, respectively.

At the time this report was prepared, the mix tanks and mechanical mixers appeared to be in proper operating order.

2.3.1.3.4 Sedimentation Tanks

Sedimentation tanks were inspected in June, August, and September 2012 by isolating one tank from the others so that the system could remain operational, if needed. The contents of the isolated tank were processed at the filter press or transferred to one of the remaining tanks, and the inside of the empty tank subsequently was inspected. All four sedimentation tanks were found to be in good condition and operating properly. Photographs documenting the condition of the sedimentation tanks are presented in Appendix D.

2.3.1.3.5 Surge Tank

The surge tank was inspected in August 2012. No significant sediment accumulation was noted inside the tank. No significant corrosion or deterioration of the surge tank was noted. At the time this report was prepared, the high-level float for the surge tank was in proper operating order.

2.3.1.3.6 Filter Bag Vessels

The filter bag vessels were inspected in August 2012 by first removing the filter bags and then noting the condition of the vessels. No sediments had accumulated in the vessels and the vessels were found to be in good condition and operating properly.

2.3.1.3.7 Backwash Tank

During the annual cleanout, the backwash tank was inspected and the pump float maintained/cleaned. The backwash tank was found to be in good condition and operating properly.

2.3.1.3.8 GAC Vessels

Granular activated carbon (GAC) in the two GAC vessels was replaced in May 2012. The GAC from the PWPO facility was removed by Calgon Corporation and sent to its reactivation facilities. The empty GAC vessels were filled with 40,000 pounds of new GAC (Filtrisorb 300) from Calgon Corporation. Appendix D includes documentation related to the replacement of the GAC. .

2.3.1.3.9 Filter Press and Cake Disposal

The filter press was inspected for normal wear and tear as part of the annual inspection. The filter press was found to be in good condition and operating properly.

The filter press is operated on an as-needed basis throughout the year depending on precipitation. Periodically, filter cake is removed from the filter press and temporarily stored onsite inside the dry shed (on plastic) prior to offsite disposal. The filter cake was analyzed in September 2012 and profiled as a special waste (i.e., non-hazardous waste). Accumulated filter cake is disposed of at the Riverbend Landfill in McMinnville, Oregon, under Permit #100421OR. Appendix D presents the analytical data for disposal of the filter cake.

2.3.2 Routine Inspections

The SWTS Operations and Maintenance Plan was finalized in February 2012 (BCI 2012a). During January and February 2012, several of the older checklists were used to complete the routine inspections. The tables below which summarize the inspections include both sets of checklists.

2.3.2.1 Treatment Plant Conveyance System Inspection

Routine inspections of the treatment plant conveyance system are summarized on Table 7. Appendix D includes copies of the completed 2012 checklists.

Table 7: Summary of Treatment Plant Storm Water Conveyance System Inspections

Month	Observation	Action
January	<ul style="list-style-type: none">Inspected as scheduledNo exceptions	<ul style="list-style-type: none">n.a.
February	<ul style="list-style-type: none">Inspected as scheduledNo exceptions	<ul style="list-style-type: none">n.a.
March	<ul style="list-style-type: none">Inspected as scheduledNo other exceptions	<ul style="list-style-type: none">n.a.
April	<ul style="list-style-type: none">Inspected as scheduledNo exceptions	<ul style="list-style-type: none">n.a.
May	<ul style="list-style-type: none">Inspected as scheduledNo exceptions	<ul style="list-style-type: none">n.a.
June	<ul style="list-style-type: none">Inspected as scheduledNo exceptions	<ul style="list-style-type: none">n.a.

Month	Observation	Action
July	<ul style="list-style-type: none"> System down for annual cleaning Inspections not conducted 	<ul style="list-style-type: none"> n.a.
August	<ul style="list-style-type: none"> System down for annual cleaning Inspections not conducted 	<ul style="list-style-type: none"> n.a.
September	<ul style="list-style-type: none"> System down for annual cleaning Inspections not conducted 	<ul style="list-style-type: none"> n.a.
October	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
November	<ul style="list-style-type: none"> Inspected as scheduled except for November 24 and 25 (holiday) No other exceptions 	<ul style="list-style-type: none"> n.a.
December	<ul style="list-style-type: none"> Inspected as scheduled except for December 25th (holiday) No other exceptions 	<ul style="list-style-type: none"> n.a.

In general, storm water conveyance systems were not inspected on weekends and holidays.

2.3.2.2 Storm Water Treatment System Component Inspections

Routine inspections of the storm water treatment system components are documented on the following checklists:

- Oil/water separator, wet well, storage system checklist
- Sedimentation system checklist
- Treatment chemical checklist
- Bag filtration system checklist
- GAC system checklist

In addition to the inspection of SWTS components, daily and weekly maintenance inspections are conducted to ensure proper operation of equipment. The results of the SWTS component inspections and daily-weekly maintenance inspections are summarized in Table 8. Appendix D includes copies of the completed 2012 checklists.

Table 8: Summary of Storm Water Treatment System Component and Daily-Weekly Maintenance Inspections

Month	Observation	Action
January	<ul style="list-style-type: none"> Inspected as scheduled 17th – Flow meter reading is not accurate 	<ul style="list-style-type: none"> 17th – Flow meter repaired.
February	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
March	<ul style="list-style-type: none"> Inspected as scheduled 11th – Float on transfer pump T-4 needs replacement 26th – Wet well float needs replacement Some bag filter and GAC vessel pressure differential readings missing 	<ul style="list-style-type: none"> 11th – Float replaced. 26th – See Corrective Action Form #03-12.

Month	Observation	Action
April	<ul style="list-style-type: none"> Inspected as scheduled 4th – Fast mix tank mixer bearing needs replacement 11th – Leak found in pipe to pump 12th – Leaking gaskets found on GAC Vessel #1 18th – Mix Tank #1 mixer bearing needs replacement 	<ul style="list-style-type: none"> 4th – See Corrective Action Form #04-12. 11th – See Corrective Action Form #05-12. 12th – Repaired on 13th. 18th – See Corrective Action Form #06-12.
May	<ul style="list-style-type: none"> Inspected as scheduled Some bag filter pressure differential readings missing 7th – Compressor oil changed 8th – Carbon replaced in GAC vessels 	<ul style="list-style-type: none"> n.a.
June	<ul style="list-style-type: none"> Inspected as scheduled Some bag filter and GAC vessel pressure differential readings missing No other exceptions 	<ul style="list-style-type: none"> n.a.
July	<ul style="list-style-type: none"> Inspected as scheduled Some bag filter and GAC vessel pressure differential readings missing No other exceptions 	<ul style="list-style-type: none"> n.a.
August	<ul style="list-style-type: none"> System down for annual cleaning Routine inspections not conducted 	<ul style="list-style-type: none"> n.a.
September	<ul style="list-style-type: none"> System down for annual cleaning Routine inspections not conducted 	<ul style="list-style-type: none"> n.a.
October	<ul style="list-style-type: none"> System down for annual cleaning Routine inspections not conducted 	<ul style="list-style-type: none"> n.a.
November	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
December	<ul style="list-style-type: none"> Inspections as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.

In general, storm water treatment systems components were not inspected on weekends and holidays.

2.3.3 Routine Maintenance

2.3.3.1 Daily-Weekly Maintenance

Table 8 also summarizes the daily-weekly maintenance inspections at the PWPO facility. Appendix D includes copies of the 2012 checklists.

2.3.3.2 Quarterly Maintenance

As part of its routine inspections, PWPO conducts quarterly maintenance on the air compressor and SWTS pumps associated with the wet well, sedimentation system, and filter systems. A review of the checklist shows that PWPO performs these maintenance checks as scheduled. PWPO also conducted quarterly inspections of the French drains and manhole in 2012 as part of quarterly maintenance inspections. The quarterly checklists are included in Appendix D.

2.3.4 Compliance Assessment

PWPO is in compliance with the requirements for SWTS O&M activities as described in Section C of the Revised Statement of Work.

2.4 BEST MANAGEMENT PRACTICES (SECTION D OF THE REVISED STATEMENT OF WORK)

On August 23, 2011, as required in the Revised Statement of Work, PWPO submitted to USEPA and ODEQ a Best Management Practices Plan (BMP Plan) for the Sheridan facility. The BMP Plan documents the rationale for selection of facility BMPs and describes the inspection, recordkeeping, and reporting procedures PWPO will use to reduce potential pollutant loading to storm water and support a healthy environment at its facility in Sheridan, Oregon. PWPO received Agency comments on the BMP Plan on November 10, 2011. PWPO addressed Agency comments and issued the final BMP Plan on December 6, 2011. ODEQ received additional comments from USEPA on January 25, 2012, which were forwarded to PWPO for inclusion in the BMP Plan. These comments were addressed in the Final BMP Plan for the site submitted to the Agencies on May 4, 2012 (BCI 2012b). The BMP Plan includes several inspection checklists designed to monitor the performance of BMPs at the site. However, because the BMP Plan was not finalized until May 2012, inspections conducted from January through May were documented on older checklists.

2.4.1 Routine Inspections

Because the BMP Plan is all inclusive, it includes inspections conducted under the various regulatory programs in effect at the PWPO facility. Inspections related to the facility's SPCC Plan and Resource Conservation and Recovery Act (RCRA) compliance are discussed in the appropriate sections of this report. Routine inspection checklists in this section include the following:

- White Pole Storage Yard Storm Water Conveyance System Checklist
- French Drain Cleanout and Manhole SW Conveyance System Checklist
- General Inspection Checklist

2.4.1.1 White Pole Storage Yard Storm Water Conveyance System Checklist

Review of the white pole storage yard conveyance system checklist indicates that the conveyance system was inspected as scheduled and that it has been operating as intended. However, it was noted that excessive sediments were accumulating in several of the drainage ditches which impeded drainage. Therefore, PWPO decided to replace four culverts in the white pole storage yard to improve drainage. A final Soil Management Plan (BCI 2012c) for the culvert replacement project was approved by ODEQ on January 3, 2013. This project is discussed in detail in Section 4.1

2.4.1.2 General Inspection Checklist

Table 9 summarizes these weekly inspections, which monitor damage/deterioration, malfunctions, leaks, seal integrity, building integrity, container leaks, spilled material/debris, and posted signs, as appropriate, in the following locations:

- Cooling tower
- Pumps/compressors
- Chemical storage area

The 2012 General Inspection Checklists are presented in Appendix E.

Table 9: Summary of General Inspection Checklists

Month	Observation	Actions
January	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
February	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
March	<ul style="list-style-type: none"> Inspected as scheduled Week #1 - Tanks 11 and 12 need NFPA information No exceptions 	<ul style="list-style-type: none"> Completed March 5, 2012
April	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
May	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
June	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
July	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
August	<ul style="list-style-type: none"> Inspected as scheduled No other exceptions 	<ul style="list-style-type: none"> n.a.
September	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
October	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
November	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
December	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.

NFPA = National Fire Protection Association

2.4.1.3 Discovery of Spills and Corrective Actions

Two spills/releases were reported to the Oregon Emergency Response System (OERS) in 2012 and are discussed briefly below.

2.4.1.3.1 July 20, 2012

On July 20, 2012, an incident occurred at the PWPO facility that resulted in the introduction of approximately 20 gallons of 5.95% penta work solution into the facility’s storm water conveyance system. The work solution flowed through the storm water conveyance system, mixed with water in that system and was routed and contained in the oil/water separator of the facility’s storm water treatment system. Approximately ½ gallon of the solution entered the oil/water separator; the balance was contained in the storm water conveyance system itself. No reportable quantities of “oil or hazardous substances” were released outside the storm water conveyance trenches or oil/water separator. Within seven hours of discovery, all work solution was collected and containerized and the storm water conveyance and treatment system was completely emptied of residual material.

Out of an abundance of caution, PWPO reported the incident to OERS on August 1, 2012 (OERS#2012-1904). PWPO subsequently filed a Spill/Release Report and other documentation as required (see

Appendix E). PWPO has since made changes to its operations to minimize the likelihood of a similar accident.

2.4.1.3.2 August 18, 2012

On August 18, 2012, penta work solution was released to the north tank yard, MatCon asphalt cap and storm water conveyance system. The majority of the release occurred inside secondary containment. However, as a result of the pressure involved, a part of the release sprayed over the containment wall and onto the MatCon asphalt cap. The material that was released outside of secondary containment flowed over the MatCon asphalt cap to a catch basin, where the release entered the storm water conveyance system and was contained within the coalescing plate vault (part of the oil/water separator). Within six hours of discovery, all work solution was collected and containerized and the storm water conveyance and treatment system was completely emptied of residual material.

This release occurred when a cam-lock cap failed in the north tank farm. The cam-lock cap failed as a result of pressure buildup in a pipeline while penta work solution was being filtered. The pressure buildup forced open an improperly closed valve, forcing the cam-lock cap off the hose connection.

No impact to the environment occurred and none of the work solution left the MatCon cap or storm water conveyance system. The incident was reports to OERS on August 18, 2012 (OERS#2012-2046). PWPO subsequently filed a Spill/Release Report and other documentation as required (see Appendix E). PWPO has since made changes to its operations to minimize the likelihood of a similar accident.

2.4.1.4 Minor Releases/Cleanup

PWPO has been using the Corrective Action Forms to describe and document the discovery and cleanup of any spill, leak, or release of hazardous and non-hazardous materials at the facility. PWPO also uses the Incidental Drillage Inspection and Cleanup log, created as part of the facility's updated Drillage Management Contingency Plan (PWPO 2011a), to document the discovery and cleanup of spills or leaks, including other non-penta containing materials, found while conducting daily inspections of the treated wood inspection area and storage yard for incidental drillage from treated wood products.

The 2012 Corrective Action Forms are included in Appendix B. Incidental drillage checklists are included in Appendix F.

Table 10 summarizes releases discovered in 2012 that are unrelated to incidental drillage from treated wood products, the latter of which is discussed in Section 3.1.10.4.

Table 10: Summary of Spills and Corrective Actions

Month	Observation	Action
January	• No spills or drillage observed	• n.a.
February	• No spills or drillage observed	• n.a.
March	• 3rd – Oil/water separator leaking • No spills or drillage observed	• 3 rd – See Corrective Action Form #02-12
April	• 27 th – Oil possibly in runoff by peeler	• 27 th – See Corrective Action Form # 10-12
May	• No spills or drillage observed	• n.a.

Month	Observation	Action
June	<ul style="list-style-type: none"> 1st – Accidental release from Tank 1 vent 3rd – Tank B overflow into secondary containment 9th – Hydraulic leak from Komatsu loader, north side of loading pad 15th – Diesel spill onto MatCon asphalt cap during delivery 17th – Loader leaking hydraulic oil 28th – ACQ valve leak 	<ul style="list-style-type: none"> 1st – See Corrective Action Form #14-12 3rd – See Corrective Action Form #15-12 15th – See Corrective Action Form #16-12 17th – Spills and leaks cleaned up upon discovery and loader repaired. 28th – Valve repaired.
July	<ul style="list-style-type: none"> 12th – Leaking valve on Tank 18 16th – Air scrubber drain leaking 17th – Spill by north tank farm 20th – Penta release to storm water conveyance system 21st – Spill at west end of treating building 	<ul style="list-style-type: none"> 12th – Leaking valve reported to maintenance department and repaired 20th – See Section 2.4.1.3. Spills reported to EHS Supervisor and cleanup
August	<ul style="list-style-type: none"> 18th – Penta release to secondary containment, MatCon cap and storm water conveyance system 	<ul style="list-style-type: none"> See Release/Spill Report in Appendix E for description of actions taken in response to penta release
September	<ul style="list-style-type: none"> No spills or drippage observed 	<ul style="list-style-type: none"> n.a.
October	<ul style="list-style-type: none"> 10th – Oil leak from rolling stock 	<ul style="list-style-type: none"> 10th - Cleaned up upon discovery
November	<ul style="list-style-type: none"> No spills or drippage observed 	<ul style="list-style-type: none"> n.a.
December	<ul style="list-style-type: none"> 13th – Release at north tank farm filters 	<ul style="list-style-type: none"> 13th - Cleaned up upon discovery

2.4.2 Reportable Quantity Releases

Consistent with PWPO policy of full disclosure, and out of an abundance of caution, the releases discussed in Section 2.4.1.3 were reported to OERS and other authorities.

2.4.3 Changes to BMP Plan

None in 2012.

2.4.4 Compliance Assessment

PWPO is in compliance with the requirements for best management practices as described in Section D of the Revised Statement of Work.

The inspections were conducted within the specified timeframes. Equipment has been maintained and functions as designed; leaks/spills of non-hazardous and hazardous waste are noted and addressed upon discovery; the integrity of secondary containment systems is maintained; signs are posted as required; drums are properly labeled; the perimeter of the facility is properly signed and fenced; and drainage ditches and basins/gates are maintained and operate properly.

The BMP Plan described a “crack and vac” approach to minimizing the release of vapors from retorts when opened. In 2012, PWPO designed and installed a clean air purge system that introduces clean air into the retorts before the doors of the retort are opened. This new system replaces the “crack and vac” approach to minimizing the release of vapors to the environment.

3 COMPLIANCE WITH APPLICABLE ENVIRONMENTAL LAWS

The following statutes and regulations apply to PWPO's operations at the Sheridan facility.

3.1 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Oregon has adopted all federal hazardous waste regulations (Title 40 of the Code of Federal Regulations, Parts 260-270 [40 CFR § 260-270]) pursuant to Oregon Administrative Rules, Chapter 340, Division 140, Section 002 (OAR 340-100-002).

3.1.1 Generator Status

PWPO is registered as a large-quantity generator (LQG) of hazardous waste, USEPA ID# ORQ000020818. Until 2011, PWPO was a LQG of hazardous waste because the facility was not clean closed after the purchase of TLT assets. Since PWPO began treating with penta in 2011, it is a generator of the listed hazardous waste F032.

3.1.2 Recordkeeping and Reporting Requirements

PWPO is in compliance with the following hazardous waste recordkeeping and reporting requirements:

- Has obtained a USEPA identification number
- Retains hazardous waste manifests for a minimum of 3 years
- Retains land disposal restriction notices for a minimum of 3 years
- Retains waste determination data for a minimum of 3 years
- Conducts annual reporting and retains annual reports for a minimum of 3 years
- Pays hazardous waste generator fees
- Documents employee training and maintains training records for a minimum of 3 years

3.1.3 Accumulation Time Limits

PWPO is in compliance with the following accumulation time limit:

- Onsite storage for less than 90 days

3.1.4 Waste Identification Requirements

PWPO's annual hazardous waste report for 2011 (Appendix F) identifies the following hazardous waste streams for the facility:

Waste Stream	Associated Hazardous Waste Codes
Profile 252989	F032

3.1.5 Personnel Training

PWPO is in compliance with RCRA personnel training requirements, including a written training program, documentation of employee training, and annual training updates. Documentation of hazardous waste trainings and training updates is included in Appendix F.

3.1.6 Preparedness and Prevention/Contingency Requirements

PWPO is in compliance with RCRA preparedness and prevention/contingency requirements, including the following:

- Preparedness and Prevention Plan
- Contingency Plan and Emergency Procedures
- Drillage Management Contingency Plan

3.1.6.1 Preparedness and Prevention Plan

PWPO has updated and implemented a Preparedness and Prevention Plan (PWPO 2011b) to satisfy the requirements of OAR 340-104-0001, 40 CFR § 262.34, and 40 CFR § 265 Subpart C, regarding facility operations and maintenance, emergency equipment, communication or alarm systems, aisle space, and arrangements with local first responders regarding emergency response.

3.1.6.2 Contingency Plan and Emergency Procedures

PWPO has updated and implemented Contingency Plan and Emergency Procedures (PWPO 2011c) to satisfy the requirements of OAR 340-104-0001, 40 CFR § 262.34, and 40 CFR § 265 Subpart D. The document presents procedures to be used should an emergency involving hazardous waste occur at the facility.

3.1.6.3 Drillage Management Contingency Plan

PWPO has updated and implemented its Drillage Management Contingency Plan (PWPO 2011a) to satisfy the requirements of 40 CFR § 265.440(c). This document describes procedures to identify and clean up infrequent and incidental drillage from treated wood products.

3.1.7 Shipping Requirements

All offsite disposal of PWPO's hazardous waste is in compliance with RCRA shipping requirements. The hazardous waste manifest log documenting offsite disposal of RCRA wastes is included in Appendix F. PWPO's annual hazardous waste report documents the shipment and disposal of hazardous waste from the facility.

3.1.8 Container Storage Requirements

PWPO uses Satellite Accumulation Areas (SAAs) to temporarily accumulate hazardous waste in 55-gallon drums. The following SAAs are shown on Figure 5:

- Framing skids
- Drip pads
- North tank farm
- Pit 5
- Shop

As required by the regulations, each 55-gallon drum in the SAAs is labeled "Hazardous Waste." Once a drum is full, it is dated and moved within 3 days to the hazardous waste storage area (see Figure 5), where it is held for up to 90 days before it is shipped offsite for disposal. Appendix F includes copies of the 2012 Hazardous Waste Logs documenting PWPO's management of hazardous waste drums.

3.1.9 Use of Drip Pads

In accordance with 40 CFR § 265 Subpart W, all treated wood products are placed on a drip pad to allow excess treatment solution, if present, to drip off the treated product. Any treatment solution that collects in the drip trays is vacuumed back into the retort and reused. Any treatment solution falling

onto the drip pad drains to a sump and is reused in the treatment process. PWPO maintains cease drippage records documenting that treated products are drip-free prior to removal from the drip pad.

Drip pads are cleaned at least every 90 days in accordance with 40 CFR § 265 Subpart W.

3.1.10 Routine Inspections

PWPO conducts routine inspections of the following:

- Drip pads
- Hazardous waste containers and storage areas
- Treated wood inspection area and storage yard

3.1.10.1 Drip Pad Inspections

Table 11 summarizes drip pad inspections, which monitor damage/deterioration, malfunctions, leaks, presence of debris, cracking, presence of standing liquids on drip pads, and operation of related equipment, including the following:

- Run-on/run-off systems
- Leak detection system
- Drip pad surface
- Steel trays (drip trays)
- Double wall containment
- Sumps/pumps

The 2012 Weekly Drip Pad Inspection Reports are presented in Appendix F and discussed below.

Table 11: Summary of Weekly Drip Pad Inspections

Month	Observation	Action
January	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • See Corrective Action Form #01-12.
February	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
March	<ul style="list-style-type: none"> • Inspected as scheduled • Week #4 – Drip trays on Retort 5 leaking • 	<ul style="list-style-type: none"> • Week #4 – See Corrective Action Form 01-12.
April	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
May	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
June	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
July	<ul style="list-style-type: none"> • Inspected as scheduled • Week #1 – Broken edge of drip pad near west end of cart track 	<ul style="list-style-type: none"> • Ongoing maintenance scheduled.

Month	Observation	Action
August	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
September	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
October	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
November	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
December	<ul style="list-style-type: none"> Inspected as scheduled No other exceptions 	<ul style="list-style-type: none"> n.a.

Weekly drip pad inspections were conducted within the specified timeframe and provided weekly assessment of drip pad equipment and systems. A review of the inspection checklists shows that the drip pad and associated equipment have been maintained and are functioning as designed.

3.1.10.2 Hazardous Waste Container Inspection Reports

Table 12 summarizes the waste container inspections, which are intended to identify unlabeled, open, damaged, leaking, spilled, or full containers of hazardous waste in the following areas:

- Framing skids
- Drip pad
- North tank farm
- Pit 5
- Hazardous waste storage area

The 2012 Waste Container Inspection Reports also document the condition of the hazardous waste storage area, including aisle space and the condition of secondary containment system. The waste container inspection reports are presented in Appendix F.

Table 12: Summary of Hazardous Waste Container Inspection Reports

Month	Observation	Action
January	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.
February	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.
March	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.
April	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.
May	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.
June	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.
July	<ul style="list-style-type: none"> Inspected as scheduled, except for first week of month (holiday) No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.

Month	Observation	Action
August	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.
September	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.
October	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.
November	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.
December	<ul style="list-style-type: none"> Inspected as scheduled No unlabeled, opened, damaged, or leaking containers observed 	<ul style="list-style-type: none"> n.a.

The hazardous waste container inspections were conducted within the specified timeframe and provided monthly assessment of waste containers, satellite accumulation areas, and the hazardous waste storage area. A review of the inspection checklists shows that containers are regularly inspected for leaks or damage and proper labeling. The presence of full drums is noted on the logs. These full containers are moved to the Hazardous Waste Storage Area within 3 days of being filled.

PWPO holds full hazardous waste drums for less than the 90-day accumulation period. Copies of PWPO's 2012 Hazardous Waste Logs documenting the "date in" and "date out" are included in Appendix F, along with manifests for each hazardous waste drum.

3.1.10.3 Incidental Drillage

The 2012 Incidental Drillage Inspections and Cleanup Logs are used to monitor incidental drillage in the Treated Wood Inspection Area and Storage Yard. These logs are presented in Appendix F and are discussed below. As discussed in Section 2.4.1.5, PWPO has been using the Incidental Drillage Inspection and Cleanup Log to also record corrective action related to other types of spills, leaks, and releases. Table 13 below discusses only incidental drillage and associated cleanup related to treated wood products.

Table 13: Summary of Incidental Drillage Inspection and Cleanup Logs

Month	Observation	Action
January	<ul style="list-style-type: none"> Inspected as scheduled 11th – ACQ drillage in dry shed 21st – Drillage of glue lam beam adjacent to railcar shed 22nd – Drillage at inspection skids 23rd – Drillage at inspection skids 	<ul style="list-style-type: none"> All dates - drillage cleaned up upon discovery
February	<ul style="list-style-type: none"> Inspected as scheduled 5th – Penta drillage at inspection skids 13th – Penta drillage at inspection skids 	<ul style="list-style-type: none"> Poles moved back to drip trays Drillage cleaned up upon discovery
March	<ul style="list-style-type: none"> Inspected as scheduled 5th – Penta drillage at inspection skids 	<ul style="list-style-type: none"> Drillage cleaned up upon discovery

Month	Observation	Action
April	<ul style="list-style-type: none"> Inspected as scheduled 11th – ACQ drippage on unloading pad 14th – Penta drippage on unloading pad 24th – Penta drippage on unloading pad 	<ul style="list-style-type: none"> Poles moved back to drip trays Drippage cleaned up upon discovery Debris managed as F032 waste
May	<ul style="list-style-type: none"> Inspected as scheduled 8th – Penta drippage from glue lam beams 15th – Drippage of poles at inspection skids 16th – Drippage from glue lam beams 23rd – Penta drippage from glue lam beams 	<ul style="list-style-type: none"> Poles moved back to drip trays Drippage cleaned up upon discovery
June	<ul style="list-style-type: none"> Inspected as scheduled 15th – Penta drippage from glue lam beams 17th – Penta drippage from cart in storage area 26th – Penta drippage from poles 27th – Penta drippage from poles 28th – Penta drippage from poles 29th – Penta drippage from poles 	<ul style="list-style-type: none"> Cart repaired Drippage cleaned up upon discovery Poles moved back to drip trays
July	<ul style="list-style-type: none"> Inspected as scheduled 1st – Penta drippage from glue lam beams near block dissolver process area 2nd – Penta drippage from poles 11th – Penta drippage from striker 24th – Penta drippage from glue lam beams 	<ul style="list-style-type: none"> Drippage cleaned up upon discovery 11th – Striker used on other charges
August	<ul style="list-style-type: none"> Inspected as scheduled 1st – Penta drippage from glue lam beams at unload pad 6th – Drippage around lumber 8th – Drippage around lumber in dry shed 16th – Drippage around lumber 	<ul style="list-style-type: none"> Drippage cleaned up upon discovery
September	<ul style="list-style-type: none"> Inspected as scheduled 6th – Penta drippage in dry shed 7th – Penta drippage from glue lam beams 10th – Penta drippage from glue lam beams 11th – Penta drippage from glue lam beams 12th – Penta drippage from glue lam beams 13th – Penta drippage from glue lam beams 14th – Penta drippage from glue lam beams 17th – Penta drippage from glue lam beams 18th – Penta drippage from glue lam beams 19th – Penta drippage from glue lam beams 20th – Penta drippage from glue lam beams 21st – Penta drippage from glue lam beams 24th – Penta drippage from glue lam beams 25th – Penta drippage from glue lam beams 26th – Penta drippage from glue lam beams 27th – Penta drippage from glue lam beams 	<ul style="list-style-type: none"> Drippage cleaned up upon discovery Treaters worked on identifying the cause and taking corrective action

Month	Observation	Action
October	<ul style="list-style-type: none"> Inspected as scheduled 9th – Lumber cart leaking 9th – Penta drippage from glue lam beams 10th – Penta drippage from glue lam beams 11th – Penta drippage from glue lam beams 15th – Penta drippage from glue lam beams 16th – Penta drippage from glue lam beams 17th – Penta drippage from glue lam beams 18th – Penta drippage from glue lam beams 	<ul style="list-style-type: none"> Drippage cleaned up immediately upon discovery Treaters worked on identifying the cause and taking corrective action
November	<ul style="list-style-type: none"> Inspected as scheduled 3rd – Remove debris from MatCon asphalt cap near roll away dumpster 13th – Penta drippage from glue lam beams 14th – Penta drippage from glue lam beams 15th – Penta drippage from glue lam beams 22nd – ACQ drippage in dry shed 23rd – ACQ drippage in dry shed 22nd – ACQ drippage in dry shed 23rd – ACQ drippage in dry shed 24th – ACQ drippage in dry shed 26th – ACQ drippage in dry shed 27th – ACQ drippage in dry shed 28th – ACQ drippage in dry shed 29th – ACQ drippage in dry shed 30th – ACQ drippage in dry shed 	<ul style="list-style-type: none"> 3rd - Debris managed as F032 waste Drippage cleaned up immediately upon discovery
December	<ul style="list-style-type: none"> Inspected as scheduled 13th – Penta drippage from pole 	<ul style="list-style-type: none"> Drippage cleaned up immediately upon discovery

Routine inspections of the treated wood inspection area and storage yard are conducted daily. Incidental drippage was cleaned up immediately upon discovery.

Incidental Drippage inspections were conducted within the specified timeframe. PWPO conduct daily inspection of the treated wood inspection area and storage yard in compliance with the requirements of RCRA. These daily inspections are effective in identifying and cleaning up any incidental drippage from treated wood products upon discovery.

3.1.11 ODEQ RCRA Inspection

A RCRA inspection was not conducted by ODEQ in 2012.

3.1.12 Violations

None.

3.1.13 Corrective Actions

None required.

3.1.14 Compliance Assessment

PWPO is in compliance with the applicable RCRA requirements for the Sheridan facility.

3.2 CLEAN WATER ACT

3.2.1 NPDES Permit Compliance Summary

PWPO discharges storm water from two outfalls, Outfalls 003 and 005, under an NPDES permit (No. 101267) administered by the ODEQ. Outfalls 001, 002, and 004 were eliminated by TLT as part of changes to the site drainage system to collect and route all storm water from the treatment plant area (Figure 2) to the SWTS. Currently, all treated effluent from the SWTS is discharged via Outfall 003 into the South Yamhill River at River Mile 38.9. Outfall 005 receives untreated storm water runoff collected from the western portion of the site (i.e., the white pole storage yard) and discharges into the facility perimeter ditch, which drains into Rock Creek. PWPO monitors both Outfalls 003 and 005 in accordance with Schedules A and B of the NPDES permit.

PWPO's NPDES permit renewal application was submitted to ODEQ in 2009, consistent with the applicable regulatory requirements and operates consistent with the requirements of the permit. ODEQ has issued an administrative extension for the permit and expects to renew the permit in 2015. A copy of the permit is included in Appendix G.

3.2.1.1 Permit Requirements

3.2.1.1.1 Schedule A

The following waste discharge limitations are not to be exceeded:

Treated Effluent – Outfall 003

Parameter	Monthly Average (ug/l*)	Daily Maximum (ug/l)
Arsenic, total	48	850
Copper	12	18
Zinc	110	120
Pentachlorophenol	13	20
pH	6.0 - 9.0	6.0 - 9.0

* ug/l = microgram per liter

Storm Water – Outfall 005

Parameter	Limitation
Oil & Grease	Shall not exceed 10 mg/l
pH	Shall be within the range of 6.0 to 9.0
Floating Solids	No visible discharge permitted
Debris	No discharge permitted

3.2.1.1.2 Schedule B

The following minimum monitoring requirements are applied to the facility:

Treated Effluent – Outfall 003¹

Parameter	Minimum Frequency	Type of Sample
Arsenic, total	Quarterly ²	Grab
Mercury, total	Quarterly ²	Grab
Dioxins/Furans	2 years ³	Grab
Copper, total	Monthly	Grab
Pentachlorophenol	Monthly	Grab
Ammonia	Monthly	Grab
Boron	Monthly	Grab
pH	Monthly	Grab

Note¹: Sampling only required during months and quarters when discharging from the SWTS.

Note²: May be discontinued after 2 years unless otherwise notified by ODEQ.

Note³: No additional dioxin/furan required unless otherwise notified by ODEQ.

Storm Water – Outfall 005

Parameter	Minimum Frequency	Type of Sample
Oil & Grease	Quarterly	Visual Observation
pH	Quarterly	Grab
Floating Solids	Quarterly	Visual Observation
Debris	Quarterly	Visual Observation

3.2.1.2 Exceedance

There were no exceedances in 2012. Monthly discharge reports are included in Appendix G.

In January 2012, PWPO reported an overflow of the wet well as the result of the failure of the high-flow pump. Documentation related to the overflow is included in Appendix G.

3.2.1.3 Corrective Actions

The failed high-flow wet well pump was replaced in January 2012.

3.2.1.4 Compliance Assessment

With the exception of the January 2012 overflow, PWPO is in compliance with the requirements of the NPDES permit.

3.2.2 Oil Pollution Prevention (SPCC Plan) Compliance Summary

In accordance with OAR 340-141, Oil Spill Contingency Planning and Fees, and Title 40 of the Code of Federal Regulations, Part 112 (40 CFR § 112), Oil Pollution Prevention, a revised SPCC Plan (BCI 2012d) was prepared for the PWPO facility describing changes to the PWPO facility since the prior plan was implemented in 2009 (Maul Foster 2009).

3.2.2.1 Changes to the Facility

The most recent SPCC Plan (BCI 2012d) includes a description of all new tanks and equipment related to the production of penta concentrate and work solution at the PWPO facility. The plan will be revised in first quarter of 2013 to include a new 2,500-gallon double-wall steel biodiesel tank located on the west side of the railcar shed. The new tank was installed in December 2012, when PWPO replaced the former

750-gallon biodiesel fuel tank. No other changes to the facility that affect the contents of the SPCC Plan were made in 2012, with the exception of administrative changes (i.e., personnel changes).

In 2012, PWPO completed installation of 1/4 inch steel plates (retort #1, block dissolver process area, and north tank farm) and 3/16 inch steel plates (remaining retorts) on the floor and walls of the systems containment systems to eliminate the possibility of a potential release entering the subsurface environment through the floor or walls of the containment system. The objective of this action is to reduce the probability of a future release from mingling with existing TLT contamination beneath the facility.

3.2.2.2 Plan Requirements

PWPO's SPCC Plan includes the following information, as required by 40 CFR § 112:

- Professional Engineer's certification
- Plan must be sequenced per 40 CFR § 112.7 or provide cross references
- Facility diagram
- Oil spill predications
- Facility drainage map
- Facility inspections
- Site security
- Five-year review
- Management approval
- Appropriate secondary containment
- Loading/unloading requirements and procedures for rail tank cars and tank trucks
- Personnel training and oil spill prevention briefings
- Brittle fracture evaluations
- Bulk storage container compliance
- Transfer procedures and equipment

The revised 2012 SPCC Plan fulfills the requirements cited above.

3.2.2.3 Routine Inspections

PWPO conducts routine daily, weekly, and monthly inspections of the facility to ensure that leaks, spills, overflows and damage to equipment do not result in the release of oil to navigable waters of the state. Because the revised SPCC Plan did not go into effect until July 2012, inspection checklists from the prior SPCC Plan were used in the first 6 months of 2012 (i.e., the Operating Equipment, Drum, Maintenance and Transfer Checklists and Process Area Inspection Checklist).

A review of the SPCC Plan checklists is presented below.

3.2.2.3.1 Operating Equipment, Drum, Maintenance, and Transformer Checklists

Table 14 summarizes these daily inspections, which monitor leaks, damage/deterioration, containment integrity, and presence of spill kits at the following locations:

- Framing skids
- Hazardous waste storage drums
- Incisor tank

- Peeler tank
- Used-oil tank
- Transformer
- Other

The 2012 Operating Equipment, Drum, Maintenance, and Transformer Inspections are presented in Appendix H.

Table 14: Summary of Operating Equipment, Drum, Maintenance, and Transformer Inspections

Month	Observation	Action
January	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
February	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
March	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
April	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
May	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
June	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.

3.2.2.3.2 Process Area Daily Inspections

Table 15 summarizes these daily inspections, which monitor leaks, damage/deterioration, containment integrity, and presence of spill kits at the following process area locations:

- Loading/unloading area
- Evaporation system
- Valves/pressure system
- South tank farm
- North tank farm
- Pole cart storage area

The 2012 Process Area Daily Inspection Checklists are presented in Appendix H and discussed below.

Table 15: Summary of Process Area Daily Inspections

Month	Observation	Action
January	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
February	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.
March	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	<ul style="list-style-type: none"> • n.a.

Month	Observation	Action
April	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
May	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
June	<ul style="list-style-type: none"> Inspected as scheduled 16th – Damage to containment system from loader 	<ul style="list-style-type: none"> 16th – Damage was minor and no action required

3.2.2.3.3 Daily SPCC Walkthrough Inspection Checklists

Table 16 summarizes these daily inspections, which monitor leaks, damage/deterioration, access/obstructions, and use of drip pans in the following locations:

- South tank farm/wastewater treatment system (WWTS)
- North tank farm/retorts
- Condenser/vacuum pump room
- Block dissolver process area
- Biofuel tank
- Used oil tank
- Truck bay
- Railcar shed
- Peeler hydraulic tank

The 2012 Daily SPCC Walkthrough Inspection Checklists are presented in Appendix H.

Table 16: Summary of Daily SPCC Walkthrough Inspection Checklists

Month	Observation	Action
July	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
August	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
September	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
October	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
November	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.
December	<ul style="list-style-type: none"> Inspected as scheduled No exceptions 	<ul style="list-style-type: none"> n.a.

3.2.2.3.4 Weekly SPCC Walkthrough Inspection Checklists

Table 17 summarizes these weekly inspections, which monitor leaks, damage/deterioration, and access/obstructions in the following locations. The 2012 Weekly SPCC Walkthrough Inspection Checklists are presented in Appendix H.

- Oil barrel storage area
- Gasoline shed

- Small incisor-breakdown hoist
- Framing skids drum
- Transformer (south)
- Transformer (north)
- Peeler drum storage area

Table 17: Summary of Weekly SPCC Walkthrough Inspection Checklists

Month	Observation	Action
July	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.
August	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.
September	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.
October	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.
November	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.
December	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.

3.2.2.3.5 Monthly SPCC Walkthrough Inspection Checklists

These inspections monitor the condition of oil-filled tanks, tank foundations, associated piping and pumps, pipe supports, liquid level sensors, and secondary containment systems. The 2012 Monthly SPCC Walkthrough Inspection Checklists are presented in Appendix H. Table 18 summarizes these monthly inspections, which monitor the following locations:

- South tank farm
- North tank farm
- Block dissolver process area
- Condenser/vacuum pump room

Table 18: Summary of Monthly SPCC Walkthrough Inspection Checklists

Month	Observation	Action
July	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.
August	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.
September	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.
October	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.
November	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.
December	<ul style="list-style-type: none"> • Inspected as scheduled • No exceptions 	• n.a.

3.2.2.4 Tank Integrity Testing and Inspections

Tank integrity tests were conducted in September 2011. Final reports of the test results were not available for inclusion in the 2011 Environmental Audit Report. Final reports and the schedule for completing repairs identified in the reports were forwarded to the USEPA and ODEQ on May 3, 2012 (BCI 2012e). Repairs have been completed as scheduled. PWPO is currently seeking a tank testing firm to conduct testing at all of its facilities.

3.2.2.5 Compliance Assessment

The SPCC Plan includes the required information as established by 40 CFR § 112.7. Inspections were conducted as scheduled and were effective at identifying leaks and/or damage to equipment and containment systems.

3.3 CLEAN AIR ACT

3.3.1 Air Contaminant Discharge Permit Compliance Assessment

In compliance with OAR 340-216, PWPO operates under a Standard Air Contaminant Discharge Permit (Permit No. 36-7004-SI-01) administered by the ODEQ. Prior to treatment with penta in 2011, the facility operated under a Simple Permit. However, the increased potential to emit volatile organic compounds (VOCs) when the facility began using penta required a Standard Air Contaminant Discharge Permit.

3.3.2 Permit Requirements

The Air Contaminant Discharge Permit and its recent Modification (see Appendix I) sets forth emission limits, compliance demonstration requirements, recordkeeping requirements, and reporting requirements for the facility.

3.3.3 Management Practice Plan

PWPO has updated and implemented a Management Practice Plan describing procedures utilized to reduce Hazardous Air Pollutants (HAPs) and to document compliance with the requirements of 40 CFR § 63 Subpart QQQQQQ. The Management Practice Plan is included in Appendix I.

3.3.4 Violations

None.

3.3.5 Corrective Actions

None required.

3.3.6 Compliance Assessment

PWPO is in compliance with the conditions and limitations established in its Standard Air Contaminant Discharge Permit.

4 COMPLIANCE WITH INSTITUTIONAL CONTROLS

As required by the Amended Agreements, PWPO has recorded an Easement and Equitable Servitude (EES) that imposes various institutional controls at the facility.

Among those institutional controls are restrictions on certain activities within the PWPO facility. The EES also imposes certain notice and pre-approval requirements prior to conducting certain activities and specific waste management requirements. Each item discussed below is related to the activities conducted at the facility in 2012.

4.1 SOIL MANAGEMENT PLANS

Section 3.1.a of the EES includes the following requirements:

- a. Excavation of soils from within the West Facility shall be conducted in a manner that is protective of human health and the environment. Owner shall submit a written plan for soil management and obtain ODEQ approval before excavating soils from within the West Facility.

Presented below is a brief summary of the 2012 soil management plans prepared by PWPO.

4.1.1 Electrical Vault

In September 2011, PWPO installed a new electrical service at the Sheridan facility. Installation included an excavation north of the Incisor and Staining Building for an underground vault that houses underground connections to the new electrical transformer. The excavated soils were consolidated into a single stockpile located to the north of the excavation. The stockpiled soil was placed directly on the ground and covered with 6-millimeter polyethylene plastic sheets held in place with lumber.

Samples of the stockpiled soil were collected on September 30, 2011. Analysis of the samples detected concentrations of arsenic and dioxins (expressed as total equivalents, or TEQs) above ODEQ risk-based concentrations (RBCs). The source of these chemicals is existing contamination caused by TLT's prior wood preserving activities at the facility.

The stockpiled soil was determined to be a "non-hazardous" waste containing dioxins and arsenic in concentrations greater than ODEQ RBCs. PWPO proposed to dispose of the stockpiled soil at Waste Management's Subtitle C facility in Arlington, Oregon.

In April 2012, the USEPA and ODEQ approved a Final Soil Management Report (SMR) (BCI 2012f) for the stockpiled soil. Stockpiled soils were removed from the site and transported to the Waste Management facility on June 7 and 8, 2012.

The April 9, 2012 SMR for the stockpiled soil included a provision to sample the surface soils directly beneath the former large and small stockpiles. The soil samples from these locations were collected from approximately 6 inches to 8 inches below ground surface on June 8, 2012. The samples contain arsenic below or slightly above the RBC and therefore do not require additional management. Dioxin, however, was detected in one sample at a concentration twice that of the RBC.

To prevent potential worker exposure to dioxin-containing surface soils in the vicinity of the electrical vault, PWPO proposed—and ODEQ approved—the placement of 6 to 8 inches of clean crushed rock over the area north of the Incisor and Staining Building. To delineate the clean fill from the underlying dioxin-containing soil, PWPO first placed geotextile fabric over the surface soils in this area. In the future, if excavations are conducted in this area, the geotextile fabric will alert the workers to the potential presence of dioxin-containing soils (BCI 2012g). The geotextile fabric and crushed rock were installed in December 2012.

4.1.2 Peeler Area

As part of the EPA's 5-Year Review of the Taylor Lumber and Treating Superfund site, conducted on April 27, 2012, an area of intermittently stained soil was observed south and east of the peeler.

The source of the petroleum hydrocarbons detected in the peeler area is likely from intermittent oil leaks from rolling stock (i.e., loaders) used to feed logs to the peeler, as well as hydraulic leaks for the peeler. Until May of 2012, rolling stock was parked east of the peeler asphalt pad when loader operators were on break. PWPO changed its operating procedures in May 2012 and loaders are no longer parked in this area. Loaders are now parked near the chip bunker when operators are on break and in the dry shed when not in use. The peeler operators conduct pre-shift inspections for leaks from the peeler equipment. PWPO has also implemented a maintenance program for the rolling stock to minimize releases from this equipment.

Excavation of total petroleum hydrocarbon (TPH)-impacted soils occurred in August and October 2012. Confirmation sampling detected relatively low concentrations of residual petroleum hydrocarbons, below the appropriate occupational RBCs for soil ingestion, dermal contact, and inhalation. To minimize the potential for precipitation and storm water to mobilize these residual TPH concentrations, PWPO raised the elevation of soil in the vicinity of the peeler to that equal to the elevation of the asphalt pad around the peeler by placing up to 2 feet of crushed rock over the areas excavated and in other areas around the peeler. This gravel pad will minimize the potential for storm water to come into contact with and mobilize the residual petroleum hydrocarbons in the peeler area (BCI 2012h).

4.1.3 Culvert Replacement Project

The culvert replacement project is part of routine, ongoing facility maintenance required to improve drainage in the white pole storage yard. Because soil excavation is necessary to replace the culverts, a Soil Management Plan (SMP) for the project was submitted to the USEPA and ODEQ on March 5, 2012, per the requirements of the EES. ODEQ comments were received by PWPO on March 26, 2012, and incorporated into the final SMP (BCI 2012c), which was submitted to the USEPA and ODEQ on April 3, 2012, and approved by ODEQ on April 4, 2012. On September 27, 2012, ODEQ was contacted about the need to replace two additional culverts. Verbal approval for the additional locations was received September 27, 2012, and additional samples were collected. On November 30, 2012, the Culvert Project Soil Management Report (Revised) (BCI 2012i) was forwarded to ODEQ for review and approval. The SMR was approved on January 3, 2013.

The soils to be excavated during the culvert replacement project are neither a listed nor characteristic hazardous waste under RCRA, nor are the soils considered "contaminated" under ODEQ rules. Therefore, PWPO will, to the extent possible, use the excavated soils as backfill. Because of the presence of low levels of dioxins in two soil samples, PWPO will place a cap of compacted crushed rock over those excavated areas. A geotextile fabric will be placed over the soil returned to the excavation to delineate the new crushed rock backfill from the underlying soils containing low levels of dioxins. Future

subsurface activities in this area will be limited to those critical to the operation of the PWPO facility. If excavation work is done in these areas in the future, the geotextile fabric will alert workers to the potential presence of dioxin-containing soils.

4.1.4 Peeler Area Water Line Replace Project

PWPO prepared a SMP for replacement of a water line located to the south of the peeler (BCI 2012j). The water line was leaking as a result of heavy equipment operations in the area related to handling large poles at the peeler. The SMP was approved by the USEPA and ODEQ on September 14, 2012.

Rather than replace the water line, PWPO decided to place the new pipeline on existing grade, which was then covered with up to 2 feet of crushed rock as part of the peeler project (Section 4.2.1). The addition of the crushed rock brought the area up to the same grade as the asphalt cap around the peeler, thus increasing the size of the work area for the loaders while protecting the new waterline from the weight of the loaders.

4.1.5 Long-Term Protections

In 2012, PWPO constructed long-term protections in two areas of the facility to alert workers to areas where contaminants are present in concentrations greater than RBCs. These areas are shown on Figure 6 and include:

- Area north of the Incisor Building where a new electrical transformer was installed in 2011 (see Section 4.1.1). This area contains soil with dioxin concentrations greater than the RBC for an occupational work for ingestion, dermal contact and inhalation.
- Two areas in the white pole storage yard where culverts were replaced to facility drainage (see Section 4.1.3). This area contains soil with dioxin concentrations greater than the RBC for an occupational work for ingestion, dermal contact and inhalation.

To delineate these areas and to assist future workers in identifying these areas, a geotextile fabric was first placed over the soil with residual concentrations of dioxin and subsequently covered with crushed rock to bring the area to finished grade (elevation).

4.2 INVESTIGATION-DERIVED WASTE

Section 3.1.b of the EES includes the following requirements:

b. Investigation derived wastes (IDW) must be handled and disposed of properly in accordance with state and federal regulations. IDW soil and water from within the slurry wall and beneath the MatCon asphalt cap would be classified under Resource Conservation and Recovery Act (RCRA) as F032, F034, or F035 listed waste based on the wood-preserving formulations used at the facility.

No investigation-derived wastes were generated in 2012.

4.3 COMPLIANCE ASSESSMENT

PWPO is in compliance with the Institutional Controls set forth in the EES.

5 LETTERS, PLANS, AND REPORTS

5.1 REQUIRED BY THE AGREEMENTS

As required by the Amended Agreements, PWPO has prepared and submitted to the Agencies the following documents:

- Storm Water Treatment System Operation and Maintenance Plan (BCI 2012a)
- Best Management Practices Plan, April 26, 2012 (BCI 2012b)
- Tank integrity testing (BCI 2012e) (see Section 3.2.2.4)

5.2 LETTERS, PLANS, AND REPORTS

PWPO has submitted several letters, plans, and reports to the Agencies in 2012 with the intent of complying with the terms of the EES, responding to specific Agency requests, or reporting incidents at the facility. These include:

- Soil management plans and reports as discussed above in Section 4.1
- Spill/Release Reports as discussed in Section 2.4.1.3
- Health and Safety Plan for Soil Management Plans (BCI 2012k)

6 CONCLUSIONS

6.1 CHANGED CONDITIONS

The following changed conditions have occurred at the facility during 2012:

- Welded steel plates have been installed as liners in all secondary containment systems of the north tank farm, retorts, and block dissolver process area.
- Repairs to the drip pad hoist were completed.
- A new 2,500-gallon biodiesel tank was installed in December 2012.
- PWPO has had several personnel changes in 2012.

6.2 CONCLUSIONS

The following conclusions are made regarding the activities reviewed in the 2012 Annual Environmental Audit Report.

6.2.1 TLT Superfund Site O&M Activities

- PWPO has conducted routine inspections of the MatCon asphalt cap and groundwater extraction system in compliance with the requirements of the Agreements.
- PWPO has made repairs to the MatCon asphalt cap consistent with the requirements of Exhibit 3A, Revised Statement of Work to the Amended Agreements.
- PWPO has maintained the MatCon asphalt cap consistent with Exhibit 3A, including routinely sweeping the cap and applying new pavement lettering and striping on the MatCon asphalt cap.
- PWPO is in compliance with the requirements for the TLT Superfund Site O&M activities as defined in Exhibit 3A.

6.2.2 Compliance with Applicable Environmental Laws

- PWPO is in compliance with the applicable environmental laws governing the Sheridan facility.
- PWPO is aware that changed conditions (e.g., personnel changes and the new biodiesel tank) require revisions to the SPCC Plan. A revised SPCC Plan is scheduled for release in February 2013.

6.2.3 Compliance with Institutional Controls

- PWPO is in compliance with the institutional controls governing the Sheridan facility.

6.3 RECOMMENDATIONS

The following recommendations are made regarding the activities reviewed in the 2012 Annual Environmental Audit Report:

1. Review all checklists from the BMP Plan, SWTS OMP, and SPCC Plan and RCRA compliance activities to eliminate redundancy, enhance inspection efficiencies, and facilitate preparation of the annual environmental audit report.
2. Ensure that procedures are implemented and maintained to conduct all routine inspections.
3. Develop internal processes to cross-reference “maintenance requests” with improvement to the SWTS and treatment plant to document maintenance of equipment throughout the facility.

7 REFERENCES

BCI 2011a. *Storm Water Treatment System Operation and Maintenance Plan*, prepared for Pacific Wood Preserving of Oregon, prepared by Belunes Consulting Inc., September, 2011.

BCI 2012a. *Storm Water Treatment System Operation and Maintenance Plan- Final*, prepared for Pacific Wood Preserving of Oregon, prepared by Belunes Consulting Inc., February 3, 2012.

BCI 2012b. *Best Management Practices Plan*, prepared for, prepared for Pacific Wood Preserving of Oregon, prepared by Belunes Consulting Inc., April 26, 2012.

BCI 2012c. *Soil Management Plan, Culvert Replacement Project*, prepared for Pacific Wood Preserving of Oregon, prepared by Belunes Consulting, Inc., April 3, 2012.

BCI 2012d. *Spill Prevention, Control, and Countermeasure Plan*, prepared for Pacific Wood Preserving of Oregon, Inc., prepared by Belunes Consulting Inc., April 26, 2012.

BCI 2012e. *Letter to Karen Keeley, Project Manager, EPA Region 10 and Norm Read, R.G. ODEQ RE: Tank Integrity Tests*, prepared by Belunes Consulting, Inc., May 3, 2012.

BCI 2012f. *Soil Management Report, Electrical Vault*, prepared for Pacific Wood Preserving of Oregon prepared by Belunes Consulting, Inc., April 9, 2012.

BCI 2012g. *Letter to Karen Keeley, Project Manager, EPA Region 10 and Norm Read, R.G. ODEQ RE: Electrical Vault Sample Data and Soil Management Plan (Revised)*, prepared by Belunes Consulting, Inc., October 3, 2012.

BCI 2012h. *Letter to Karen Keeley, Project Manager, EPA Region 10 and Norm Read, R.G. ODEQ RE: Peeler Area Corrective Action and Confirmation Sampling*, prepared by Belunes Consulting, Inc., November 26, 2012.

BCI 2012i. *Soil Management Report (Revised), Culvert Replacement Project*, prepared for Pacific Wood Preserving of Oregon, prepared by Belunes Consulting, Inc., November 28, 2012.

BCI 2012j. *Soil Management Plan, Water Line Repair Project*, prepared for Pacific Wood Preserving of Oregon, prepared by Belunes Consulting, Inc., September 14, 2012.

BCI 2012k. *Health and Safety Plan for Soil Management Plans*, prepared for Pacific Wood Preserving of Oregon, prepared by Belunes Consulting, Inc., September 12, 2012.

Maul Foster 2009. *Spill Prevention Control and Countermeasure Plan*, prepared for Pacific Wood Preserving of Oregon, Inc., prepared by Maul Foster & Alongi, Inc., November 9, 2009.

ODEQ 2011. *Amendment to Prospective Purchaser Agreement, DEQ No. 02-03*, June 6, 2011.

PWPO 2011a. *Drippage Management Contingency Plan*, updated by PWPO, June 2011.

PWPO 2011b. *Preparedness and Prevention Plan*, updated by Pacific Wood Preserving of Oregon, Inc. (PWPO), June 2011.

PWPO 2011c. *Contingency Plan and Emergency Procedures*, updated by PWPO June 2011.

PWPO 2011d. *Communications Plan*, prepared by PWPO December 16, 2011.

USEPA 2002. *Agreement and Covenant Not To Sue between USEPA and PWPO*, February 2, 2002.

USEPA 2011. *Amendment to Agreement and Covenant Not to Sue between USEPA and PWPO*, May 26, 2011.