

Attachment A – Work Plan

In order to accommodate changes in surface elevation needed for track installation, portions of the Old East Land Treatment Unit (OELTU) will be excavated and that material placed in the New East Land Treatment Unit (NELTU). There may be some portions of the OELTU, on the north and/or south sides of the OELTU that remain undisturbed. These undisturbed areas will have their vegetative cover left in place. If there are areas between the undisturbed portions of the OELTU and the rail tracks that are disturbed, they will be revegetated.

Approximately 6 feet of excavation is planned at the OELTU, resulting in removal of up to 60,000 cubic yards. An investigation in 2015 determined that the Treatment Zone extends to depths of 4.5 to 6.5 feet below ground surface (bgs). OELTU soil has been determined to meet Contained-in Determination criteria and can be moved to the NELTU.

The OELTU, with elevation ranging from 3100-3110 feet, is higher than the NELTU, which has elevation ranging from 3087-3096 feet. To meet rail track sloping requirements, the elevation of the affected area of the OELTU must be decreased and the elevation of the affected area of the NELTU must be increased, until the NELTU is almost the same elevation as the OELTU. Soil will be moved from the OELTU, with most or all of that soil used as base, to the NELTU. Some portions of the OELTU may remain undisturbed, or soil from the disturbed areas may be moved within the OELTU. In accordance with the DEQ's Contained-In Determination, excavated soil that is not homogeneous with the OELTU soil, and has visible contamination, will be segregated, evaluated, and managed as a listed hazardous waste. Only excavated material in compliance with the Contained-In Determination will be placed in the NELTU.

Excavated material, from the OELTU, will be placed in the NELTU and will be compacted per railroad construction standards. This excavated material (OELTU) will be covered with an additional layer of clean clay fill, which will also be compacted to form a cap for the NELTU. On top of the cap, engineered select fill, such as gravel or other railway ballast, will be built up in order to place the railroad tracks. These will be compacted to meet the construction standards for railroad tracks. The railroad track profile will follow the typical rail profile shown in Attachment B.

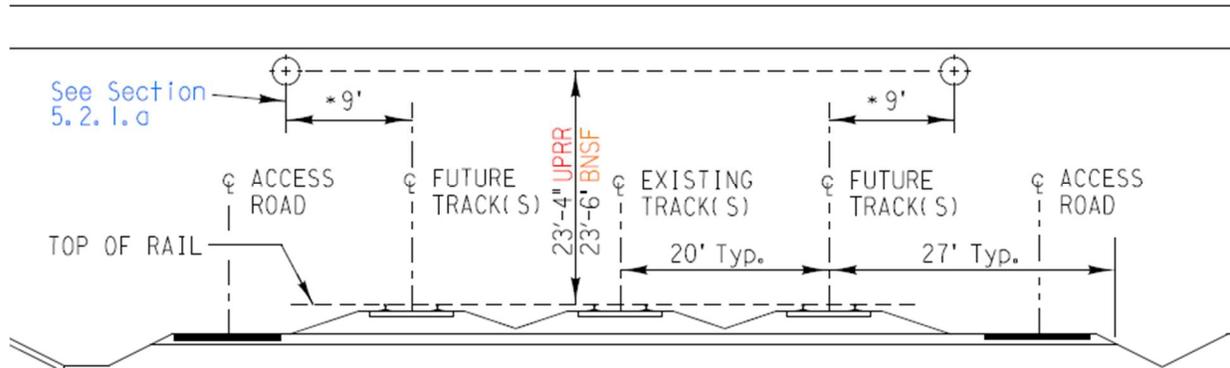
This modification of the NELTU will maintain protectiveness of the environment as specified in the Permit. The newly modified NELTU will continue to meet 40 CFR 264.280 and applicable conditions specified in the Permit. In accordance with the Contained-In Determination, the newly placed material will not be hazardous waste. Therefore, the potential for infiltration and leaching to groundwater will not be increased.

The following will be included, as a part of the Rails Project construction plan, to ensure that post closure protections are maintained.

1. Ground water monitoring well W-16A will be destroyed and a new well MW21-01 will be installed to maintain a complete monitoring network. Well MW21-01 will be a new point of compliance well. All monitoring, including BTZ and groundwater monitoring, will continue as specified in the Permit. In addition, groundwater monitoring will be performed once the project is complete and the following year to confirm there is no migration due to these activities.
2. Undisturbed areas of both land treatment units will have their vegetative cover maintained.
3. Areas disturbed during construction that are not part of the rail track footprint, will be graded, as needed, to prevent erosion. Vegetative cover will be re-established in these areas.
4. Only clean fill will be used for the construction.
5. During construction, appropriate dust control measures will be followed to control wind dispersal of dust.

6. The system of storm water run on/run off control berms will be maintained. The existing berm network that prevents storm water run on/run off will be kept in place. Portions of the berm system may need to be temporarily modified during construction. The Storm Water Pollution Prevention Plan for the Stormwater Construction General Permit will include controls to prevent storm water run-off and run-on during this time. Once construction of rail tracks has been completed, perimeter berms modified during construction will be restored to ensure the berm system maintains a perimeter that prevents run on and run off of storm water.
7. Perimeter berms at the NELTU will be elevated as necessary to accommodate the new (higher) elevation and protect against run-on and run-off conditions.
8. The site will continue to comply with the prohibition on growth of food-chain crops in the ELTUs.
9. Access to the ELTUs will continue to be controlled. The gate allowing rail cars to be brought in and out of the refinery will be closed and locked, except when cars are being moved in and out. The refinery perimeter fence will be maintained. If needed during the construction period, a gate may be placed on Johnson Lane, on the east side of the refinery. This gate will have controlled access. This gate would be used to allow clean fill or other construction material to be delivered to the site.

Attachment B Typical Rail Track Detail



From: [GUIDELINES FOR RAILROAD GRADE SEPARATION PROJECTS, MAY 2016](#)

Based on the above guidance, the width of the suggested track layout, and assuming about 25 feet between tracks and 30 feet for outside tracks, the storage yard would be about 335 feet wide. As shown in the Attachment I the track would be this width across most of both LTUs, with the footprint narrowing on the east side of the NELTU.

Attachment C

NELTU BTZ Sample Data Summary (2004 – 2019)

Parameter Analyzed	EPA Soil Screening Level at DAF = 20	Maximum Sample Result*
Oil and Grease (mg/kg)		308
Metals		
Chromium (mg/kg)	3,600,000	49.3
Lead (mg/kg)	280	113
Volatiles		
Benzene (ug/kg)	4.6	2.7
Toluene (ug/kg)	13800	8.5
Ethylbenzene (ug/kg)	34	11
Xylenes, Total (ug/kg)	3800	20
Semi-Volatiles		
Anthracene (mg/kg)	116	0.004
Benzo(a) Anthracene (mg/kg)	2.2	non detect
Benzo(b) Fluoranthene (mg/kg)	6	0.006
Benzo(a) Pyrene (mg/kg)	0.58	non detect
Chrysene (mg/kg)	180	0.005
2,4-Dimethylphenol (mg/kg)	8.4	non detect
Fluoranthene (mg/kg)	1,780	non detect
1-Methylnaphthalene (mg/kg)	0.12	non detect
o-Cresol (mg/kg)	15	non detect
m+p-Cresol (mg/kg)	14.8	non detect
Naphthalene (mg/kg)	0.0076	non detect
Phenanthrene (mg/kg)	-	0.004
Phenol (mg/kg)	66	non detect
Pyrene (mg/kg)	260	0.004

*Maximum result of analysis of 40 samples.