



# Oregon DEQ Solid Waste Disposal Facility Inspection Form

**FACILITY:** Croman Mill Site

**PERMIT NO:** Not Permitted

**INSPECTOR NAME:** David Esch

**INSPECTION DATE:** 8/20/19

**COUNTY:** Jackson

**PROJECT:** N/A

## Inspection Basis:

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Compliance Inspection    | <input type="checkbox"/> Plan Review/Report Review | <input type="checkbox"/> Citizen Complaint    |
| <input type="checkbox"/> Comprehensive Inspection | <input type="checkbox"/> Permit Condition          | <input type="checkbox"/> Field Siting         |
| <input type="checkbox"/> Compliance Audit         | <input type="checkbox"/> Enforcement Follow-Up     | <input type="checkbox"/> Technical Assistance |

## Facility Type:

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Open MSW Landfill          | <input type="checkbox"/> Open Construction/Demo LF   | <input type="checkbox"/> SWLA Facility                           |
| <input type="checkbox"/> Closed MSW Landfill        | <input type="checkbox"/> Closed Construction/Demo LF | <input type="checkbox"/> Tire Storage Facility                   |
| <input type="checkbox"/> Open Industrial Landfill   | <input type="checkbox"/> Transfer Station            | <input type="checkbox"/> Tire Carrier                            |
| <input type="checkbox"/> Closed Industrial Landfill | <input type="checkbox"/> Material Recovery Facility  | <input checked="" type="checkbox"/> Private Business (no permit) |
| <input type="checkbox"/> Open Woodwaste Landfill    | <input type="checkbox"/> Septage Lagoon              | <input type="checkbox"/> Private Residence (no permit)           |
| <input type="checkbox"/> Closed Woodwaste Landfill  | <input type="checkbox"/> Other (specify)             |  |

## Inspection Summary:

Per a request from Chris Galpin (Project Director), I made a site visit to the closed Croman Mill Site on Aug. 20, 2019. I met with John Holmes from Johnny Cat (Project Supervisor) and the visit began at approximately 12:00 p.m. The purpose of the visit was to evaluate the procedures and protocols put in place to safeguard the environment, protect human health and safety, and confirm compliance with DEQ Solid Waste environmental rules.

### Site Conditions

The site slopes from west to east with several flat "benches" that were created during the 1940's, 1950's and 1960's to accommodate mill structures and activities. The site is approximately 60 acres. About 1/3 of that area is actively involved in ongoing reclamation activities. Demolition of structures is complete, although some hard surfaces and concrete "pads" are still present. Approximately 7 acres was historically used as a landfill for predominantly wood wastes generated at the site; although other areas with deep lenses of woodwaste, for example old log deck areas, are located throughout the site. The formal landfill occupies the north-east corner of the site. In 2012 activities were begun to reclaim the landfill area by excavating the in-place materials and separating those contents in several types of usable materials: large woody items, small/decomposed wood and dirt, as well as rock. As is common on old industrial sites, it was expected that some amount of garbage and recyclable material (metal objects and tires for example) would also be encountered.

### Site Operations

There currently exist many piles of materials in various stages of sorting, processing and storage. Usable materials are moved off-site as needed and as weather permits. Mr. Holmes informed me that metal, tires and garbage were removed once enough was accumulated for a full load. No large piles of waste materials were noted during this inspection, indicating appropriate removal schedules. Additionally, due to the previous demolition of the few remaining mill structures/buildings, there were piles of asphalt/concrete and woody demolition materials which are unsuited as a soil amendment ingredient. The asphalt is being reclaimed for use in new concrete, and the concrete will likely be used as clean fill in various construction or mine reclamation projects. According to Mr. Holmes, over a million cubic yards of material have been processed to date. As is common with this type of project, estimating the size of the project and timelines for excavation, processing and removal/re-use are difficult as the materials are all sub-surface. Based on site changes noted between the 2015 inspection and this inspection, significant work has already been completed. Stormwater is managed under a DEQ 1200-C Water Quality Permit.

### Evaluation

Water trucks are used to keep dust to a minimum. There were no indications of track-out beyond the site's gates. The various piles were orderly with sufficient safe-operating room between them. Perimeter berms to the south and west prevent stormwater run-on into the site. Stormwater within the landfill is contained within the landfill excavation. Whenever feasible, materials are stored on old concrete floors that remain from previously demolished buildings. The site appeared well maintained and operated. All of the best-management-practices suggested prior to site reclamation activities began in 2012 have been implemented. Recycling efforts have been hugely successful with relatively little material having to be landfilled. No Solid Waste violations were noted.



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Pile of clean granite and other sorted materials.



One active dig area. Material is about 40% rock and 60% wood.



Large woody material to be used as hog fuel or ground into bio-mass fuel.



Sorted concrete being reclaimed for clean-fill, and asphalt for recycling into new asphalt.



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Stockpiled clean soil for backfilling.



Remnants of demolished mill building awaiting processing.



Portion of old landfill area now down to original grade/soils.



Screening equipment used to process the various materials.