



ST. HELENS FIBERBOARD FACILITY UPLAND REMEDY

Fourth Quarter 2022 Progress Report

To: Sarah Greenfield, Oregon Department of Environmental Quality
Katie Daugherty, Oregon Department of Environmental Quality
Kevin Parrett, Oregon Department of Environmental Quality

From: Benjamin Johnson, GSI Water Solutions, Inc.

CC: Alan Kidd, Armstrong World Industries, Inc.
John Ackiewicz, Armstrong World Industries, Inc.
Ronald Nonamaker, Armstrong World Industries, Inc.
Laura Kerr, Stoel Rives, LLP

Date: January 13, 2023

Dear Ms. Greenfield,

This progress report summarizes the work performed by Armstrong World Industries, Inc. (AWI), in the fourth quarter (October–December) 2022 to complete obligations under the June 19, 2019, Consent Judgment between AWI and the Oregon Department of Environmental Quality (DEQ). Progress report requirements are outlined in paragraph 5.H of the Consent Judgment. This progress report summarizes actions that were taken to satisfy ongoing requirements of the Easement and Equitable Servitude (EES) for the Upland Operable Unit (OU) Remedy.

Actions Taken under the Consent Judgment

Specific actions completed by AWI in the fourth quarter 2022 included:

- Completion of the second of two biannual cap inspections on October 3, 2022. The cap inspection report and accompanying photo log were submitted with the third quarter 2022 progress report on October 11, 2022.
- Completion of a Site Perimeter Security Inspection that was carried out on October 3, 2022. The perimeter security inspection form and associated photos were submitted with the third quarter 2022 progress report on October 11, 2022.
- Ongoing vegetation management within and along gravel cap areas with a focus on removing blackberries infringing on the Upland OU boundary markers.

Fourth Quarter Sampling Activities

No additional soil, solids, or stormwater sampling was conducted during the fourth quarter of 2022 in the Upland OU due to the AWI's "inactive" status which has been verified by DEQ.

DEQ and GSI Water Solutions, LLC completed parts of the Lowland Operable Unit Data Gaps Investigation (DGI) the fourth quarter of 2022, but they were limited to water level monitoring. No sampling activities were conducted in the Upland OU. All activities performed were unrelated to the obligations of AWI in the Consent Judgement but are detailed here for the record.

Problems Encountered during Fourth Quarter

No problems were encountered during the fourth quarter of 2022.

Actions Scheduled for First Quarter 2023

No actions are anticipated at AWI's St. Helens facility in the first quarter 2023 other than submittal of the second quarter 2022-2023 discharge monitoring report by February 15th, 2023, and written documentation of AWI's "inactive" status. AWI is released from stormwater monitoring requirements under its permit due to AWI's "inactive" status. This status has been verified in the Your DEQ Online (YDO) system administered by DEQ.

AWI will also continue vegetation management activities on the Upland OU gravel cap with a focus on keeping blackberries back from the Upland OU boundary in Cap Inspection Area #1 and keeping scotch broom back from the Upland boundary around the treatment facility and southern swale slopes in Cap Inspection Area #2.

We look forward to continuing completion of the obligations of the Consent Judgment in the first quarter 2023. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,



Benjamin Johnson, R.G.

