April 8, 2024

David Lacey
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Subject: Quarterly Progress Report for RI/FS
First Quarter 2024 Progress Report
Rhône-Poulenc - Portland Site
ECSI #155

Dear Mr. Lacey:

On behalf of StarLink Logistics, Inc. (StarLink), WSP USA Environment & Infrastructure Inc. is submitting this First Quarter 2024 Progress Report for the Remedial Investigation/Feasibility Study (RI/FS) at the Rhône-Poulenc Site. This report includes activities conducted between January 1 and March 31, 2024.

REPORTING ACTIVITIES

FEASIBILITY STUDY

StarLink submitted the *Revised Draft Feasibility Study Report – Operable Unit 1* to the Oregon Department of Environmental Quality (DEQ) on March 29, 2024.

MEETINGS AND DISCUSSIONS

None.

IN-SITU STABILIZED SEDIMENT INSPECTIONS

The first quarter in-situ stabilized sediment (ISS) cap inspection was conducted on February 16, 2024. The inspection form is presented in Attachment A.

OUTFALL 22B INTERIM REMEDIAL ACTION MEASURE

None.

IMPLEMENTATION OF THE EMERGENCY STORMWATER STANDARD OPERATING PROCEDURE

A rare winter weather event with high winds and temperatures in the teens and twenties (Fahrenheit) occurred January 11 through 18, 2024. Water treatment plant operations and groundwater and stormwater collection systems were shut down during this period due to the extreme cold. Systems that remained active included the heated bioreactor and the ISS cap stormwater collection system which was diverted to the North Property Area (NPA) in accordance with the standard operating procedure. Though groundwater and stormwater were not collected for several days, precipitation was limited to snow and ice, and no runoff was observed leaving the Site.

OTHER ITEMS

None.

ITEMS PENDING DEQ RESPONSES

- Draft Outfall 22B IRAM Performance Monitoring 2023 Annual Report, submitted November 11, 2023
- Revised Draft Feasibility Study Report, submitted March 29, 2024

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ACTIVITIES PLANNED FOR THE NEXT REPORTING PERIOD

StarLink activities planned for the next quarterly reporting period (second quarter 2024) include:

- Conducting the second quarter ISS cap inspection.
- Conducting the 2024 Outfall 22B IRAM performance monitoring event.

If you have any questions, please call Joan Underwood at (503) 278-1837.

Sincerely,

WSP USA Environment & Infrastructure Inc.

Kelsi Evans
Senior Environmental Chemist

Reviewed by:

Christy Duitman, RG
Project Manager

KE/CLD:al

cc: M. Bogdan, Sanofi
L. Maffei, Cable Huston
J. Underwood, BSI
L. Hanna, EPA

Attachments: A-ISS Cap Inspection Form – First Quarter 2024

ATTACHMENTS

In-situ Stabilized Sediment (ISS) Cap Inspection Field Form
Rhône-Poulenc Site

Field Personnel: Ethan Hensel

Inspection Date: 2-16-2024

Start Time: 12:30 | Weather Conditions: Cloudy | Approx. Air Temp (F): 45°F

ISS CAP CONDITIONS

Surface Condition Observations		Location(s):	Photograph: Yes / No
Maintenance suggested: None			
New Area(s) of Erosion Since Prior Inspection:	Yes / No	Location(s):	Photograph: Yes / No
Maintenance suggested:			
Vegetation Conditions: Excessive Growth	Yes / No	Location(s):	Photograph: Yes / No
Bare patches	Yes / No	Location(s):	Photograph: Yes / No
Maintenance suggested: None			
Evidence of Animal Burrows	Yes / No	Location(s):	Photograph: Yes / No
Maintenance suggested: Continue Burrowing animal control measures			

ABOVE-GROUND PIPING AND SUPPORTS

Pipe Condition - Leaks:	Yes / No	Location(s):	Photograph: Yes / No
Pipe Condition - Sags:	Yes / No	Location(s):	Photograph: Yes / No
Pipe Condition - Supported:	Yes / No	Location(s):	Photograph: Yes / No
Support Condition -	OK / Needs Attention	Location(s):	Photograph: Yes / No
Insulation Blanket Condition:	OK / Needs Attention	Location(s):	Photograph: Yes / No
Maintenance suggested:			

PUMP STATIONS / CATCH BASINS/ CONTROL PANELS

North Pump Station		South Pump Station	
Catch Basin Flow:	Yes / No	Catch Basin Flow:	Yes / No
Debris / sediment accumulation at catch basin:	Yes / No	Debris / sediment accumulation at catch basin:	Yes / No
Pump Station Level:	1/4 1/2 3/4 Full	Pump Station Level:	1/4 1/2 3/4 Full
Debris / sediment accumulation at pump station:	Yes / No	Debris / sediment accumulation at pump station:	Yes / No
Pump Station Control Panel Light:	On / Off	Pump Station Control Panel Light:	On / Off
Pump Station Control Panel Condition:	OK / Needs Attention	Pump Station Control Panel Condition:	OK / Needs Attention
Maintenance suggested: None		Maintenance suggested: None	

REQUIRED PHOTOGRAPHS

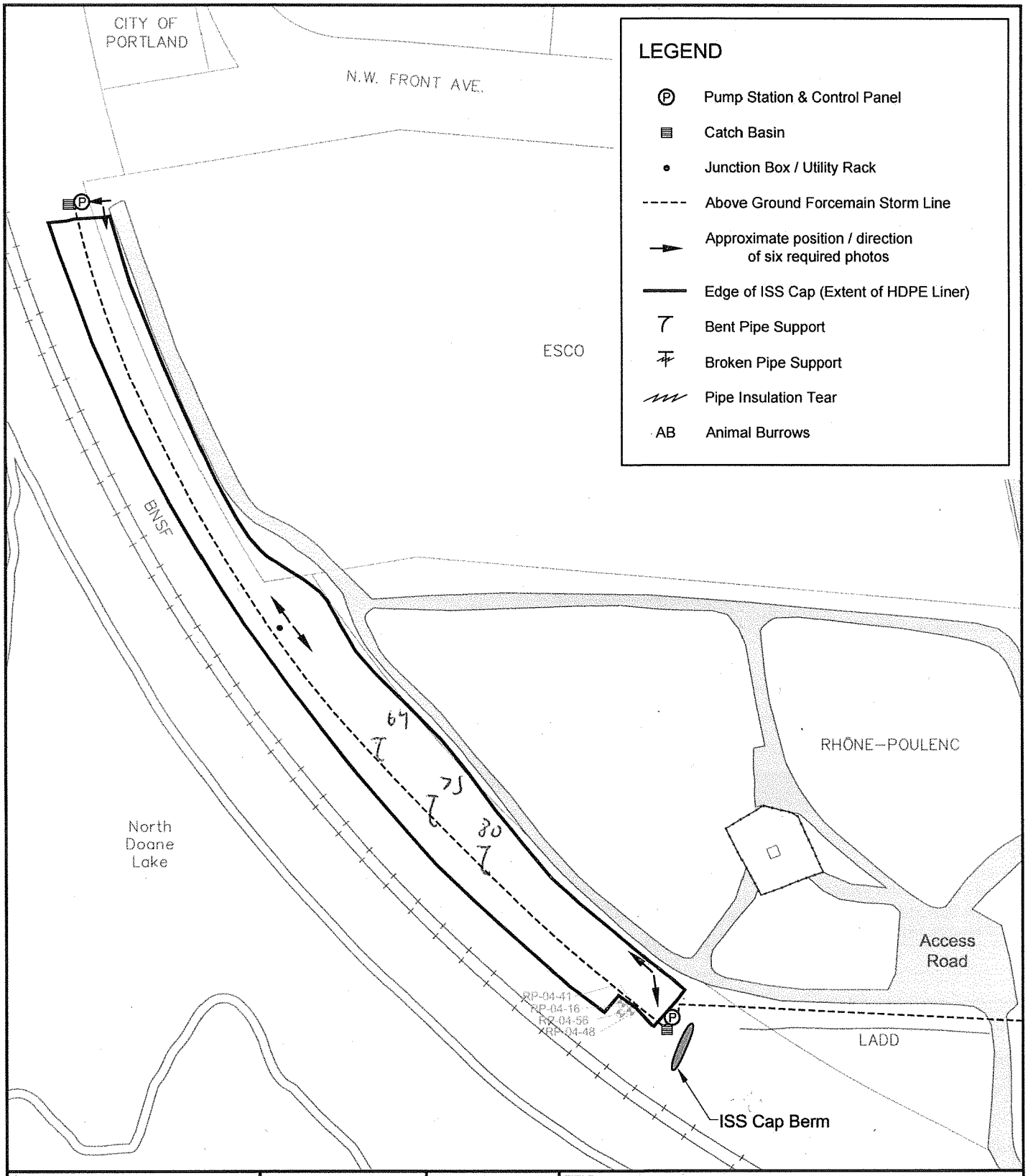
North Pump Station / Catch Basin:	Yes / No	North End of ISS cap looking South:	Yes / No
South Pump Station / Catch Basin:	Yes / No	Mid Point of ISS cap Looking South:	Yes / No
South End of ISS cap looking North:	Yes / No	Mid Point of ISS cap Looking North:	Yes / No

OBSERVATIONS/NOTES

CERTIFICATION STATEMENT

By signing below, the listed representative states that the information provided on this page is accurate.

Name (Print): Ethan Hensel | Signature: [signature] | Date Signed: 2-16-2024



0' 75' 150' 225'

amec foster wheeler

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DRAWN BY: BRJ	TITLE: FIGURE 3 IN-SITU STABILIZED SEDIMENT (ISS) INSPECTION LOCATIONS
QC BY: -	
DATE DRAWN: JANUARY 2017	REPORT: RHÔNE-POULENC PORTLAND SITE
DATUM / PROJECTION: NAD83 / OR SP N Int Ft	
PROJECT NO:	