



January 10, 2024

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

Subject: Quarterly Progress Report for RI/FS
Fourth Quarter 2023 Progress Report
Rhône-Poulenc - Portland Site
ECSI #155

Dear Mr. Lacey:

On behalf of StarLink Logistics, Inc. (StarLink), WSP USA Environment & Infrastructure Inc. (WSP) is submitting this Fourth Quarter 2023 Progress Report for the Remedial Investigation/ Feasibility Study (RI/FS) at the Rhône-Poulenc Site. This report includes activities conducted between October 1 and December 31, 2023.

REPORTING ACTIVITIES

FEASIBILITY STUDY

StarLink submitted the *Draft Feasibility Study Report* (Draft FS Report), on October 31, 2022. Following several discussions between Oregon Department of Environmental Quality (DEQ) and StarLink regarding the Draft FS Report, StarLink withdrew the report in a letter titled *Withdrawal of Draft Feasibility Study Report, October 31, 2022 Rhône-Poulenc - Portland Site, ECSI #155*, dated June 9, 2023. DEQ provided a comment letter titled *DEQ Review "Draft Feasibility Study Report-Operable Unit 1"*, dated August 3, 2023. StarLink, with DEQ's concurrence, will submit a revised draft report by March 31, 2024.

MEETINGS AND DISCUSSIONS

None.

IN-SITU STABILIZED SEDIMENT INSPECTIONS

The third quarter in-situ stabilized sediment (ISS) cap inspection was conducted on November 13, 2023. The inspection form is presented in Attachment A.

OUTFALL 22B INTERIM REMEDIAL ACTION MEASURE

The Draft Outfall 22B Interim Remedial Action Measure (IRAM) Performance Monitoring 2023 Annual Report (WSP USA, Inc. [WSP USA], 2023) was submitted to DEQ for review and comment on November 11, 2023.

IMPLEMENTATION OF THE EMERGENCY STORMWATER STANDARD OPERATING PROCEDURE

The Standard Operating Procedure (SOP) for Emergency Stormwater Management was implemented to divert stormwater away from the WTP as follows:

- ISS Cap stormwater was diverted for 26 hours, December 6 to 7.

OTHER ITEMS

Investigation derived waste and remediation waste that DEQ determined was CAMU eligible in a July 10, 2023 letter, *CAMU Eligibility Waste Disposal Approval for Waste Currently Stored in On-site Waste Storage Facility*, was shipped to Chemical Waste Management of the Northwest a Subtitle C hazardous waste landfill in December. There is currently no waste in storage in the on-site waste storage facility.



ITEMS PENDING DEQ RESPONSES

StarLink is awaiting response from DEQ on the Draft Outfall 22B IRAM Performance Monitoring 2023 Annual Report (WSP USA, 2023).

ACTIVITIES PLANNED FOR THE NEXT REPORTING PERIOD

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

- Conducting the first quarter ISS cap inspection.
- Preparing the revised FS and continue discussions with DEQ.

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

Sincerely,

WSP USA Environment & Infrastructure Inc.

A handwritten signature in black ink, appearing to read 'Christy L. Duitman'.

Christy L. Duitman, RG
Vice President, Geologist

Reviewed by:

A handwritten signature in black ink, appearing to read 'Sean F. Gormley'.

Sean F. Gormley, EAC, CHMM
Project Manager

CLD/SFG:al

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

Attachment: A-ISS Cap Inspection Form – Fourth Quarter 2023

ATTACHMENT

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

Field Personnel: Ryan Stringfellow (BSI)

Inspection Date: 12-21-2021

Start Time: 15:30

Weather Conditions: 42°F, overcast

Approx. Air Temp (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: none

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 to implement control measures for ground squirrels

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

Catch Basin Flow: Yes / No
 Debris / sediment accumulation at catch basin: Yes / No
 Pump Station Level: 1/4 1/2 3/4 Full
 Debris / sediment accumulation at pump station: Yes / No
 Pump Station Control Panel Light: On / Off
 Pump Station Control Panel Condition: OK / Needs Attention

Maintenance suggested: none

South Pump Station

Catch Basin Flow: Yes / No
 Debris / sediment accumulation at catch basin: Yes / No
 Pump Station Level: 1/4 < 1/2 3/4 Full
 Debris / sediment accumulation at pump station: Yes / No
 Pump Station Control Panel Light: On / Off
 Pump Station Control Panel Condition: OK / Needs Attention

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

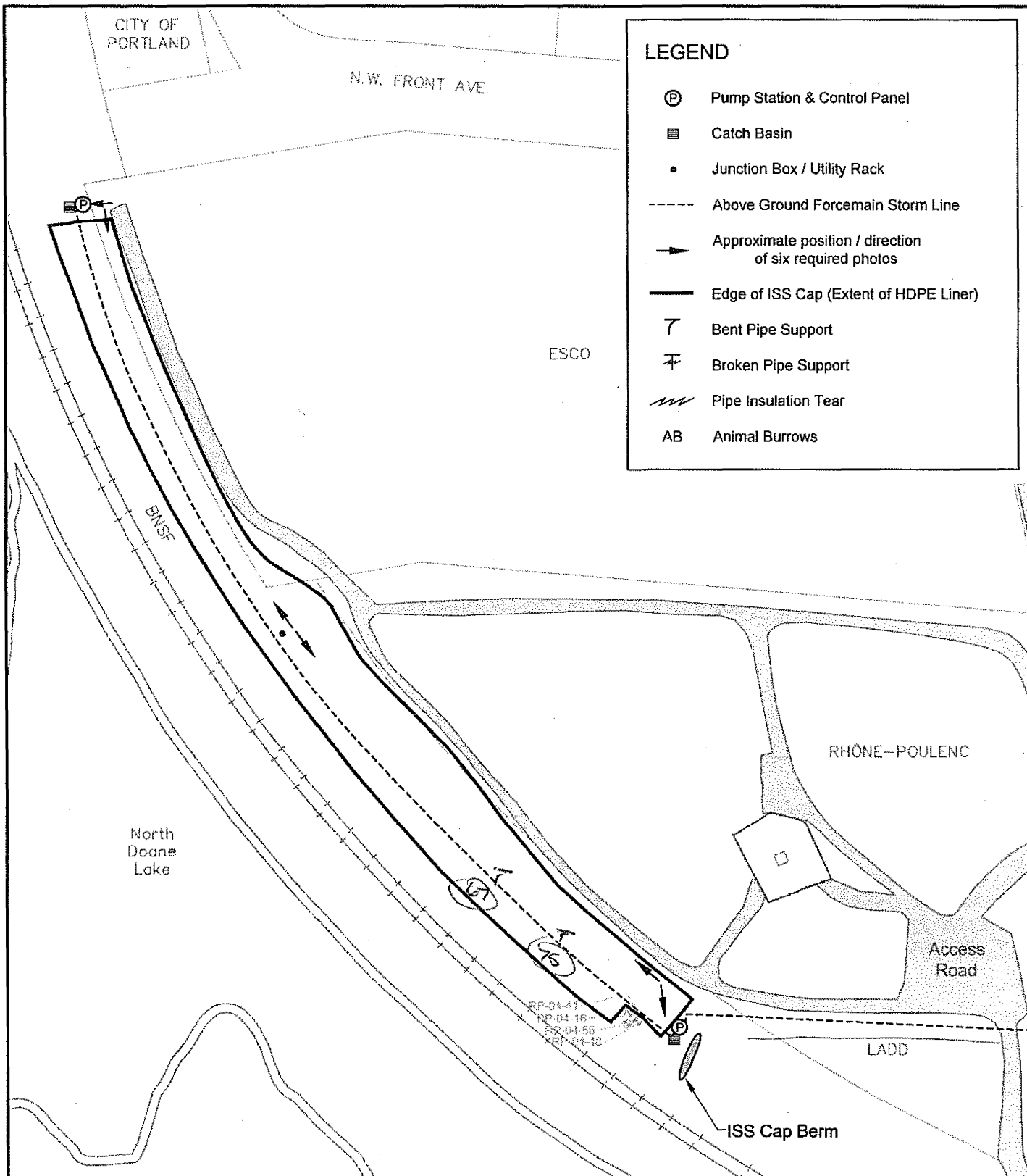
CERTIFICATION STATEMENT

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

Name (Print): Ryan Stringfellow

Signature: [Signature]

Date Signed: 12/21/2021



	 amec foster wheeler Environment & Infrastructure 7376 S.W. Durham Road Portland, OR, U.S.A. 97224	DRAWN BY: BRJ	FIGURE 3 IN-SITU STABILIZED SEDIMENT (ISS) INSPECTION LOCATIONS RHÔNE-POULENC PORTLAND SITE
		QC BY:	
		DATE DRAWN: JANUARY 2017	
		DATUM / PROJECTION: NAD83 / OR SP N Int Fl PROJECT NO:	