1050 SW 6th Avenue
Suite 1650
Portland, OR 97204

T +1 503 488 5282
F +1 503 488 5142

erm.com

MEMO

TO	Katie Daugherty, Oregon Department of Environmental Quality
FROM	Brendan Robinson, PE, Environmental Resources Management, Inc.
DATE	19 June 2024
REFERENCE	0732445 Phase 204
SUBJECT	April 2024 GW SCM Monthly Performance Monitoring Report

1. INTRODUCTION

Environmental Resources Management, Inc. (ERM) prepared this Monthly Performance Monitoring Report (MPR) on behalf of Legacy Site Services LLC (LSS), agent for Arkema Inc. (Arkema), for the former Arkema Portland Plant (the Site) at 6400 NW Front Avenue in Portland, Oregon. The Oregon Department of Environmental Quality (ODEQ), in its letter dated 31 May 2019 and in the subsequent meeting with LSS and ERM on 2 July 2019, requested that LSS initiate monthly status reports associated with the onsite groundwater source control measure (GW SCM) consistent with the Performance Monitoring Plan (PMP; ERM 2014) beginning July 2019. The 2014 PMP was prepared pursuant to the Order on Consent issued by ODEQ, signed on 31 October 2008 (ODEQ No. LQVC-NWR-08-04; Consent Order). The purpose of the PMP was to present the monitoring, reporting, and adaptive management processes used during implementation of the GW SCM. On 30 November 2021, ODEQ directed LSS that following the October 2021 MPR, subsequent MPRs would be suspended pending the implementation of the Groundwater Extraction Enhancement (GEE) project in 2022. During that time, ODEQ requested monthly schedule updates in lieu of MPRs. The trench wells installed as part of the GEE project were started on 27 November 2022, and MPR writing restarted in December 2022. The purpose of the GEE project was to install new extraction capacity to achieve the Capture Zone Objectives.

This April 2024 MPR summarizes the GW SCM performance monitoring data collected in April 2024. This report assesses the current gradient status and proposes system improvements to meet the Capture Zone Objectives set in the PMP.

2. GROUNDWATER SOURCE CONTROL IMPLEMENTATION

A detailed description of the design and implementation of the GW SCM is provided in the Revised Upland Feasibility Study Work Plan (ERM 2017); however, a brief description of the GW SCM is provided here. In February 2009, ODEQ and the U.S.

Environmental Protection Agency (USEPA) approved the general approach for the GW SCM. This approach included installation of a groundwater barrier wall (GWBW), groundwater recovery wells (RWs), and a Groundwater Extraction and Treatment (GWET) system, with treated water discharged to the Willamette River. ODEQ and USEPA approved the Groundwater Barrier Wall Final Design (ERM 2012) on 7 August 2012. Construction of the GWBW began in May 2012 and was completed in December 2012. ODEQ approved the Groundwater Extraction and Treatment System Final Design (ERM 2013) on 2 April 2013. Construction of the GWET system began in December 2012 and was completed in December 2013.

GWET startup and optimization commenced in May 2014. The GW SCM at the Site consists of the following primary components (Figure 1):

1. A GWBW to physically separate the affected upland portions and in-water portions of the Site.
2. Hydraulic control to minimize flow of groundwater containing unacceptable concentrations of constituents of potential concern (COPCs) around, over, and under the GWBW.
3. Management of extracted groundwater through the GWET system, with treated effluent discharged to the Willamette River under a National Pollutant Discharge Elimination System (NPDES) Permit.

On 1 September 2018, ERM submitted the Draft GWET System Effectiveness Evaluation (Draft SEE Report; ERM 2018). The Draft SEE Report provided an update on the corrective actions implemented to improve the performance of the GWET system, evaluate the extent of capture, and propose actions to improve hydraulic capture. Additional data requested by ODEQ were submitted on 26 October 2018.

The key objective of the GW SCM is to achieve hydraulic containment of the alluvial sequence within the Target Capture Zone at the Site to prevent the flow of COPCs to the Willamette River. The Site alluvial aquifer sequence within the Target Capture Zone consists of the Shallow Zone, Intermediate Zone, and the Deep Zone. Site hydraulic conditions are variable and subject to both seasonal and daily tidal fluctuations.

The hydraulic control component formerly consisted of 22 RWs prior to the implementation of the GEE. Of the 22 pre-existing RWs, four were retained for active pumping. The remaining 18 former RWs had pumps removed but retained their pressure transducers so that they can continuously collect high-resolution groundwater elevation data. The hydraulic control system now consists of the four-remaining active RWs, as well as seven groundwater extraction trenches that each contain two extraction wells (EWs). Each trench is approximately 50 feet deep, 50 feet long, and 3 feet wide and is filled with an engineered backfill. More information about the groundwater extraction trenches is provided in the Final Design Report (ERM 2022). The gradient control-monitoring network consists of six gradient control clusters (GCCs) with each cluster containing six monitoring points. Within each RW, EW, and

GCC location, pressure transducers are continuously collecting high-resolution groundwater elevation data. Each GCC contains three transducers interior to the wall and three transducers exterior to the wall screened in the Shallow, Intermediate, and Deep Aquifers at the Site.

3. RECOVERY WELL AND EXTRACTION WELL PERFORMANCE

The average system influent flow rate was 42.88 gallons per minute (gpm) for the entire month of April 2024, including non-operational periods. The average operational influent flow during operational periods was 50.90 gpm, a decrease from March 2024 (68.46 gpm), due to an increase in the number of fouled pumps. The average monthly influent flow rate in April 2024 increased from March 2024 monthly average flow rate (40.16 gpm), due to increased uptime.

Extraction pumps become fouled with accumulated solids over time. A proactive pump removal and maintenance program is in place to address fouling and maximize flow rates. In late February 2024, a recordable injury occurred onsite during pump removal and maintenance activities. As a result, pump maintenance activities were paused while a root cause analysis was performed, and procedures updated to mitigate ergonomic and fall risks. An updated pump pulling and maintenance procedure was approved 30 April 2024 and implemented in May 2024. Additionally, Trench 1 was off during April 2024 in preparation for chemical redevelopment to mitigate the impact of silt and biofouling at EW-01 and EW-02. Extraction rates and hydraulic gradient performance are expected to improve following resumption of pump maintenance activities and chemical redevelopment in early June 2024.

LSS is continuing to optimize extraction rates within the system to increase flow rates at each operational well until either the extraction rates specified in the *Final Design Report* (ERM 2022) are achieved, the wells are producing the maximum quantity of water possible, or until the Capture Zone Objectives are met.

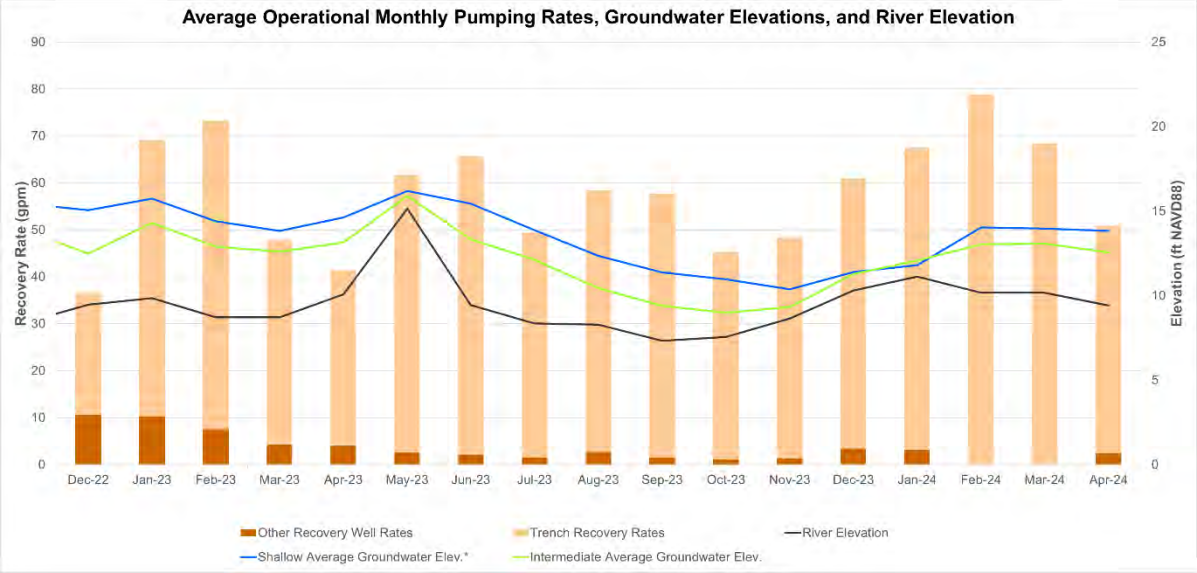
TABLE 1-1 RECOVERY WELL PUMPING RATES

Recovery Well	April 2024 Average Operational Pumping Rate (gpm)	April 2024 Average Monthly Pumping Rate (gpm)
RW-14*	0.00	0.00
RW-22*	0.00	0.00
RW-23*	0.00	0.00
RW-25	2.37	1.03
EW-01*	0.00	0.00
EW-02*	0.00	0.00

Recovery Well	April 2024 Average Operational Pumping Rate (gpm)	April 2024 Average Monthly Pumping Rate (gpm)
EW-03	4.93	4.77
EW-04	5.03	4.86
EW-05	6.49	6.27
EW-06	4.40	4.25
EW-07	0.32	0.01
EW-08	4.77	2.07
EW-09	2.66	2.57
EW-10	3.46	3.34
EW-11	2.78	0.46
EW-12	3.38	3.26
EW-13	3.91	3.78
EW-14	6.42	6.20
Total	50.90	42.88

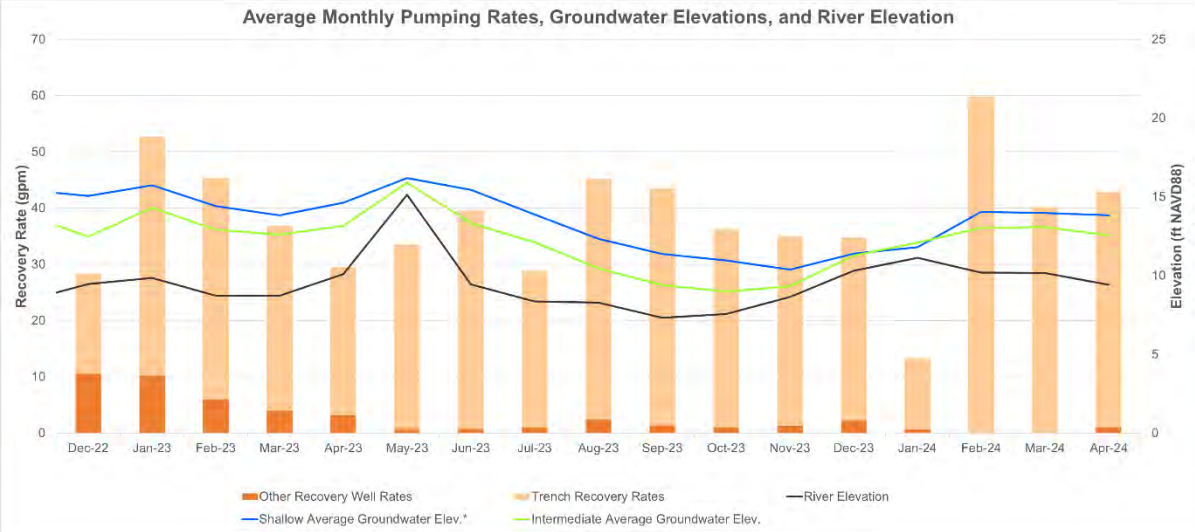
Notes:
* = Recovery well not in service during reporting period.
gpm = gallon per minute

FIGURE 1-1 OPERATIONAL PUMPING RATE



* = The shallow average groundwater elevation is calculated without PA-04 due to its groundwater elevations being unrepresentative of the whole aquifer.
ft NAVD88 = feet North American Vertical Datum of 1988

FIGURE 1-2 AVERAGE MONTHLY PUMPING RATE



* = The shallow average groundwater elevation is calculated without PA-04 due to its groundwater elevations being unrepresentative of the whole aquifer.
ft NAVD88 = feet North American Vertical Datum of 1988

3.1 GWET SYSTEM PERFORMANCE

The GWET system operated within permit conditions during the reporting period. There were two shutdowns:

- 5 April 2024: The GWET system was shut down intermittently due to the GWET effluent pH probe malfunctioning. The ODEQ was notified, the pH probe was replaced and discharge restarted 11 April 2024.
- 29 April 2024: The GWET system was shut down due to a carbon changeout on the lead carbon vessel. The ODEQ was notified, and discharge restarted 2 May 2024.

The unplanned and planned shutdowns in April 2024 resulted in 8 total days of downtime. The extended shutdown period and pause on pump maintenance continued to result in lower flow rates in April 2024. Regular pump maintenance is planned to resume 1 May 2024 and flow rates are expected to increase.

4. HYDRAULIC CONTAINMENT MONITORING PROGRAM

As described in the PMP, the purpose of hydraulic monitoring (i.e., groundwater elevation data) is to provide sufficient data to demonstrate an inward hydraulic gradient across the GWBW and to evaluate the effective hydraulic capture produced by the GW SCM.

Monitoring requirements were established in the PMP to demonstrate GWET effectiveness. The Site monitoring program includes groundwater elevation data (manual and transducer measurements) collected from the 36 monitoring points

located within six GCCs spaced across the GWBW, with piezometers interior and exterior to the wall, throughout the alluvial sequence; and groundwater elevation and flow rate data from the four-remaining active RWs and 14 EWs. High-resolution groundwater elevation data is also collected from the 18 inactive RWs. Additionally, one new monitoring well was installed in each of the seven extraction trenches for manual water level measurement. These data were used to prepare horizontal and vertical potentiometric surface maps representing potentiometric differences between the alluvial sequences, and to generate spatial and temporal hydrographs to evaluate hydraulic capture.

4.1 GROUNDWATER ELEVATION MONITORING

Groundwater elevation monitoring was completed on 19 April 2024. Manual groundwater elevations were measured at wells that were experiencing transducer mechanical issues or that were offline during the groundwater elevation measurement event. Additionally, all transducers in inactive RWs were down until upgrades were completed and transducers were sequentially turned on. Specific issues are addressed in Attachment A-1.

As detailed in Attachments A-1 and A-2, during April 2024, the following transducers were:

Fully out of service pending repairs:

- PA-07
- PA-26d

Out of service for a period but returned to full operation:

- RW-25
- RW-13

RW-13 had a faulted transducer that was replaced 16 April 2024. RW-25 had a faulted transducer that was rechecked and repaired 16 April 2024. PA-07, and PA-26d have faulted transducers that are scheduled to be replaced in May 2024. RW-13 and RW-25 are not in the GCCs.

As described above, GCC locations collect high-resolution groundwater elevation data using transducers. Transducer data are filtered to remove anomalous data from monitoring points due to potential equipment failures, such as transducer malfunctions, power outages, or updates to the GWET programmable logic controller (PLC) system, which controls and houses all the operational data. These specific issues and time periods are summarized in Table A-1 in Attachment A. The following flags are applied to filter anomalous data:

- Groundwater elevations had a change greater than 1.5 feet within 1 hour

- Water column depth measurements that were found to be greater than 50 feet, or less than 1 foot
- Calculated groundwater elevation slope indicates no change between consecutive measurements indicating a transducer malfunction
- Manually flagging data that are inconsistent with the typical nature of the well
- Periods where transducer power supply was deactivated for work on interconnected electrical systems

After April 2024 flagged data were removed, the Serfes (1991) method was used to account for tidal variations as described in the PMP. Using Serfes corrected data, both horizontal and vertical gradients were calculated and plotted over time (Attachment B). Groundwater elevations, horizontal gradients, and vertical gradients from 19 April 2024 are shown below at each GCC (Table 1-2 and Table 1-3).

TABLE 1-2 APRIL HORIZONTAL GRADIENTS

Gradient Cluster	Well Pair Zone	Exterior Well	Water Elevation (ft NAVD88)	Interior Well	Water Elevation (ft NAVD88)	Horizontal Gradient (ft/ft)
GCC1	Shallow	PA-03	27.31	PA-04	28.02	-0.007
	Intermediate	PA-17iR	12.59	PA-10i	13.81	-0.012
	Deep	PA-27d	11.34	PA-18d	11.85	-0.004
GCC2	Shallow	MWA-2	9.65	PA-05	12.45	-0.041
	Intermediate	MWA-8i	9.72	PA-11i[M]	11.41	-0.023
	Deep	PA-19d	8.46	PA-30d	9.91	-0.027
GCC3	Shallow	MWA-69	10.03	PA-06	12.91	-0.027
	Intermediate	MWA-66i[M]	9.60	PA-12i[M]	13.41	-0.034
	Deep	PA-21d	8.46	PA-20d	9.47	-0.008
GCC4	Shallow	MWA-19	10.00	PA-28	15.49	-0.054
	Intermediate	MWA-34i[M]	9.50	PA-13i	11.71	-0.024
	Deep	MWA-58d	8.97	PA-22d	10.64	-0.018
GCC5	Shallow	MWA-47	9.67	PA-07[M]	*	**
	Intermediate	PA-29i[M]	9.86	PA-14i	11.44	-0.029
	Deep	PA-24d	9.22	PA-23d	9.59	-0.007
GCC6	Shallow	PA-09	12.50	PA-08	13.47	-0.017
	Intermediate	PA-16i	11.05	PA-15i	10.67	0.007
	Deep	PA-26d[M]	11.62	PA-25d	10.06	0.025

Notes:
Positive horizontal gradient indicates an inward hydraulic gradient across the GWBW.
Horizontal gradient calculated as (Exterior Elevation – Interior Elevation) / Horizontal distance.
* = anomalous groundwater elevation; ** = horizontal gradient cannot be calculated due to anomalous elevation reading; ft NAVD88 = feet North American Vertical Datum of 1988;
M = manual groundwater elevation measurement

TABLE 1-3 APRIL VERTICAL GRADIENTS

Region	Pair	Gradient Cluster	Upper Well	Water Elevation (ft NAVD88)	Lower Well	Water Elevation (ft NAVD88)	Vertical Gradient (ft/ft)
Interior	SZ-IZ	GCC1	PA-04	28.02	PA-10i	13.81	1.44
		GCC2	PA-05	12.45	PA-11i^{M}	11.41	0.09
		GCC3	PA-06	12.91	PA-12i^{M}	13.41	-0.05
		GCC4	PA-28	15.49	PA-13i	11.71	0.59
		GCC5	PA-07^{M}	*	PA-14i	11.44	**
		GCC6	PA-08	13.47	PA-15i	10.67	0.21
	IZ-DZ	GCC1	PA-10i	13.81	PA-18d	11.85	0.26
		GCC2	PA-11i^{M}	11.41	PA-30d	9.91	0.22
		GCC3	PA-12i^{M}	13.41	PA-20d	9.47	0.20
		GCC4	PA-13i	11.71	PA-22d	10.64	0.06
		GCC5	PA-14i	11.44	PA-23d	9.59	0.05
		GCC6	PA-15i	10.67	PA-25d	10.06	0.02
Exterior	SZ-IZ	GCC1	PA-03	27.31	PA-17iR	12.59	0.94
		GCC2	MWA-2	9.65	MWA-8i	9.72	0.00
		GCC3	MWA-69	10.03	MWA-66i^{M}	9.60	0.03
		GCC4	MWA-19	10.00	MWA-34i^{M}	9.50	0.08
		GCC5	MWA-47	9.67	PA-29i^{M}	9.86	-0.02
		GCC6	PA-09	12.50	PA-16i	11.05	0.11
	IZ-DZ	GCC1	PA-17iR	12.59	PA-27d	11.34	0.19
		GCC2	MWA-8i	9.72	PA-19d	8.46	0.82
		GCC3	MWA-66i^{M}	9.60	PA-21d	8.46	0.09
		GCC4	MWA-34i^{M}	9.50	MWA-58d	8.97	0.02
		GCC5	PA-29i^{M}	9.86	PA-24d	9.22	0.02
		GCC6	PA-16i	11.05	PA-26d^{M}	11.62	-0.02

Notes:
Positive vertical gradient indicates a downward hydraulic gradient.
Vertical gradient calculated as (Upper Elevation – Lower Elevation) / Screen Midpoint distance.
* = anomalous groundwater elevation; ** = vertical gradient cannot be calculated due to anomalous elevation reading; DZ = Deep Zone; ft NAVD88 = feet North American Vertical Datum of 1988; IZ = Intermediate Zone; M = manual groundwater elevation measurement; SZ = Shallow Zone

4.2 POTENTIOMETRIC SURFACE, GROUNDWATER ELEVATION DIFFERENCE MAPS, AND GROUNDWATER FLOW DIRECTIONS

As described in the PMP, potentiometric surface maps are used to evaluate flow paths. Vertical gradients are also used as an additional line of evidence to evaluate hydraulic containment. Groundwater elevation data collected on 19 April 2024 were used to prepare potentiometric surface maps based on manual measurements and averaged transducer groundwater elevations (Figures 2 through 4) and vertical difference maps (Figures 5 and 6).

The generalized flow direction indicated by the potentiometric surface maps shows overall groundwater flow from upgradient toward the GWBW. Potentiometric maps (Figures 2, 3, and 4) indicate localized groundwater movement to the extraction trenches due to GW SCM pumping, and cones of depression are apparent around each groundwater extraction trench. Inward gradient was observed in the Intermediate and Deep Zones at GCC6. Horizontal gradients at GCCs across the Site remained mostly unchanged between March and April.

River elevations are shown over time on Figures 1-1 and 1-2 above, and in an inset on the potentiometric surface maps (Figures 2 through 4). The river elevation in April 2024 had an average elevation of 9.42 feet NAVD88 with a minimum elevation of 7.11 NAVD88 and a maximum elevation of 12.25 NAVD88, a decrease from the river elevation in March 2024.

The difference between average interior Shallow Zone groundwater elevations and river level elevation were 4.54 feet and 4.41 feet in April 2023 and April 2024, respectively. The difference between river level and Shallow Zone groundwater elevations is expected to decrease when increased groundwater extraction rates are maintained in the Target Capture Zone. A potentiometric separation is still noticeable exterior to the GWBW, indicating that is functioning by impeding groundwater flow.

Vertical gradients were calculated for each vertical well pair and are plotted on Figures 5 and 6. Vertical groundwater gradients interior to the GWBW between the Shallow and Intermediate Zones were generally downward with exception to GCC3 being upward (Figure 5). Vertical groundwater gradients are also depicted in Attachment B-3. The magnitude of the gradient is much greater at GCC1 than other monitoring locations due to the influence from a localized high-pressure zone near GCC1 where vertical groundwater flow is impeded by a localized confining unit (Figure 2). Exterior of the GWBW, vertical gradients between the Shallow and Intermediate Zones were mixed

with GCC2 and GCC5 upward and the rest downward as shown on Figure 5 and in Attachment B-2.

The vertical gradient at GCC5 was unable to be calculated due to an anomalous groundwater elevation reading at PA-07. The transducer is scheduled to be replaced 1 May 2024.

Interior of the GWBW vertical gradients between the Intermediate and Deep Zones were downward. The direction of vertical gradients exterior to the GWBW were primarily downward with exception to GCC6 being upward, as shown on Figure 6 and Attachment B-3.

As discussed above, GWET uptime was reduced in January 2024 due to reconfiguring the trunk line, and also in February 2024 for the redevelopment of EW trenches. During pump maintenance activities on 29 February 2024 an operator had a recordable injury, which resulted in a stop work on pump pulling and replacement activities. An updated pump maintenance procedure was approved 30 April 2024 by ERM and LSS. The stop work on pump maintenance reduced the flow rate capacity of the EWs during March 2024 and April 2024 because pumps could not be pulled, cleaned, and replaced. The water level measurements collected on 19 April 2024 were within in this period of reduced groundwater extraction. The lower groundwater extraction rates in March 2024 and April 2024 resulted in horizontal gradients trending more outward than previously observed. Planned EW trench redevelopment, conveyance line maintenance, and resumed pump maintenance are expected to result in greater uptime and groundwater extraction rates in May and June 2024.

4.2.1 RECOMMENDATIONS FOR EXTRACTION SYSTEM OPTIMIZATION

Recovery rates indicate that the active RWs and EWs are operating as designed, except for the troubleshooting discussed above. The extraction rates throughout the GWET system will continue to be optimized to meet Target Capture Objectives.

5. ANALYTICAL PROGRAM

Quarterly groundwater monitoring was implemented in accordance with the ODEQ-approved Arkema Quarterly Groundwater Monitoring Work Plan dated October 2019 and the ODEQ-approved reduced scope described in the 2021 monitoring program modification request memorandum dated 9 September 2021. The table below outlines sampling dates and submittal dates related to groundwater monitoring since the implementation of the reduced scope. The Quarterly Monitoring Reports present results from these sampling events.

Report	Sampling Dates	Report Submittal Date
2021 Quarter 3	9/21/2021–9/24/2021	1/14/2022
2021 Quarter 4	12/13/2021–12/16/2021	4/20/2022

Report	Sampling Dates	Report Submittal Date
2022 Quarter 1	3/14/2022–3/17/2022	6/15/2022
2022 Quarter 2	6/6/2022–6/9/2022	9/12/2022
2022 Quarter 4	11/7/2022–11/10/2022	2/17/2023
2023 Quarter 1	3/6/2023–3/10/2023	6/12/2023
2023 Quarter 2	6/12/2023–6/16/2023	9/22/2023
2023 Quarter 3	8/21/2023–8/24/2023	12/1/2023
2023 Quarter 4	12/11/2023–12/14/2023	3/15/2024
2024 Quarter 1	2/26/2024–2/29/2024	6/7/2024
2024 Quarter 2	6/10/2024–6/13/2024	9/13/2024*

* Dates are tentative.

6. SUMMARY AND CONCLUSIONS

This report presents a summary of the GW SCM operation, maintenance, and monitoring activities conducted at the Site in April 2024 and documents results from system monitoring. The following summarizes ERM's observations and conclusions drawn from collected data.

6.1 GROUNDWATER FLOW

- Horizontal groundwater gradients provided for the Intermediate and Deep Zones in Attachment B-2 show gradients were inward GCC6. Horizontal gradients at GCCs across the Site remained mostly unchanged between March and April due to a pause on pump maintenance activities. Improvements in gradients are anticipated as higher flow rates and uptime are able to be achieved.
- Vertical groundwater gradients interior of the GWBW between the Shallow and Intermediate Zones were generally downward with exception to GCC3 being upward (Figure 5). Exterior of the GWBW, vertical gradients between the Shallow and Intermediate Zones were mixed with GCC2 and GCC5 being upward and the rest downward.
- Interior of the GWBW vertical gradients between the Intermediate and Deep Zones were downward. The direction of vertical gradients exterior to the GWBW were generally downward with GCC6 being upward, as shown on Figure 6.
- The average river elevation in April 2024 was 9.42 feet NAVD88 with a minimum elevation of 7.11 feet NAVD88 and a maximum elevation of 12.25 feet NAVD88. A decrease from river elevations observed in March 2024.

6.2 GROUNDWATER EXTRACTION

Based on April 2024 extraction and relevant hydrograph analysis, the trenches are achieving increased groundwater extraction rates compared to the legacy system. The groundwater mound around Trenches 1, 2, 3, and 4 largely gone, and the mound around Trenches 5, 6, and 7 is being reduced with increased extraction rates.

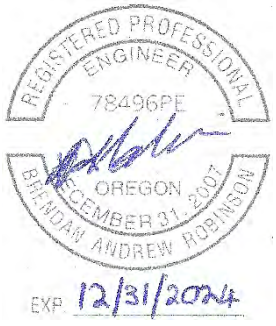
Within the Site alluvial sequence, potentiometric maps indicate the GW SCM is producing localized areas of hydraulic capture throughout the Target Capture Zone. More operational time at elevated extraction rates will be required to evaluate whether GWET objectives are being met system wide.

The groundwater extraction flow rate has been limited by a combination of groundwater elevation, fouling of the pumps within the EW trenches, accumulation of silt within the EW trenches filter pack, back pressure in the conveyance line, and a pause on pump maintenance. In January, the wellfield was reconfigured to connect three of the trenches to the Intermediate Zone trunk line to mitigate the impact of back pressure in the conveyance lines. In February, Trenches 1, 4, and 6 were redeveloped to mitigate the impact of silt and biofouling on pumping rates. Pump maintenance procedures were approved and pump maintenance resumed in May 2024. Additional redevelopment is also planned for May 2024. These efforts are anticipated to mitigate the limitations observed in Q4 2023 through Q1 2024.

6.3 RECOMMENDATIONS AND FUTURE WORK

Redevelopment of several Intermediate Zone groundwater elevation monitoring locations (RW-6i, RW-9i, RW-11i, RW-13i, RW-16i, RW-19i, RW-21i, RW-24i, RW-26i, and PA-12i) is planned for May 2024 to mitigate turbidity and improve accuracy of Intermediate Zone groundwater contour maps. Abandonment and replacement of MWA-34i is planned for May 2024. Chemical redevelopment of Trench 1 is planned for May 2024 and redevelopment of EWs is planned for May 2024 to mitigate silt impacts and increase flow rates. Additionally, conveyance line cleaning is planned for June 2024 to mitigate the observed backpressure in the conveyance lines. LSS will continue to optimize new EWs, including pump maintenance and upgrades. Additional modifications to the system, if needed to meet capture objectives, will be included in subsequent MPRs. The project schedule provided as Attachment C summarizes planned activities.

Regards,



Brendan Robinson, PE
Partner

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FIGURES

FIGURE 1: SITE LAYOUT

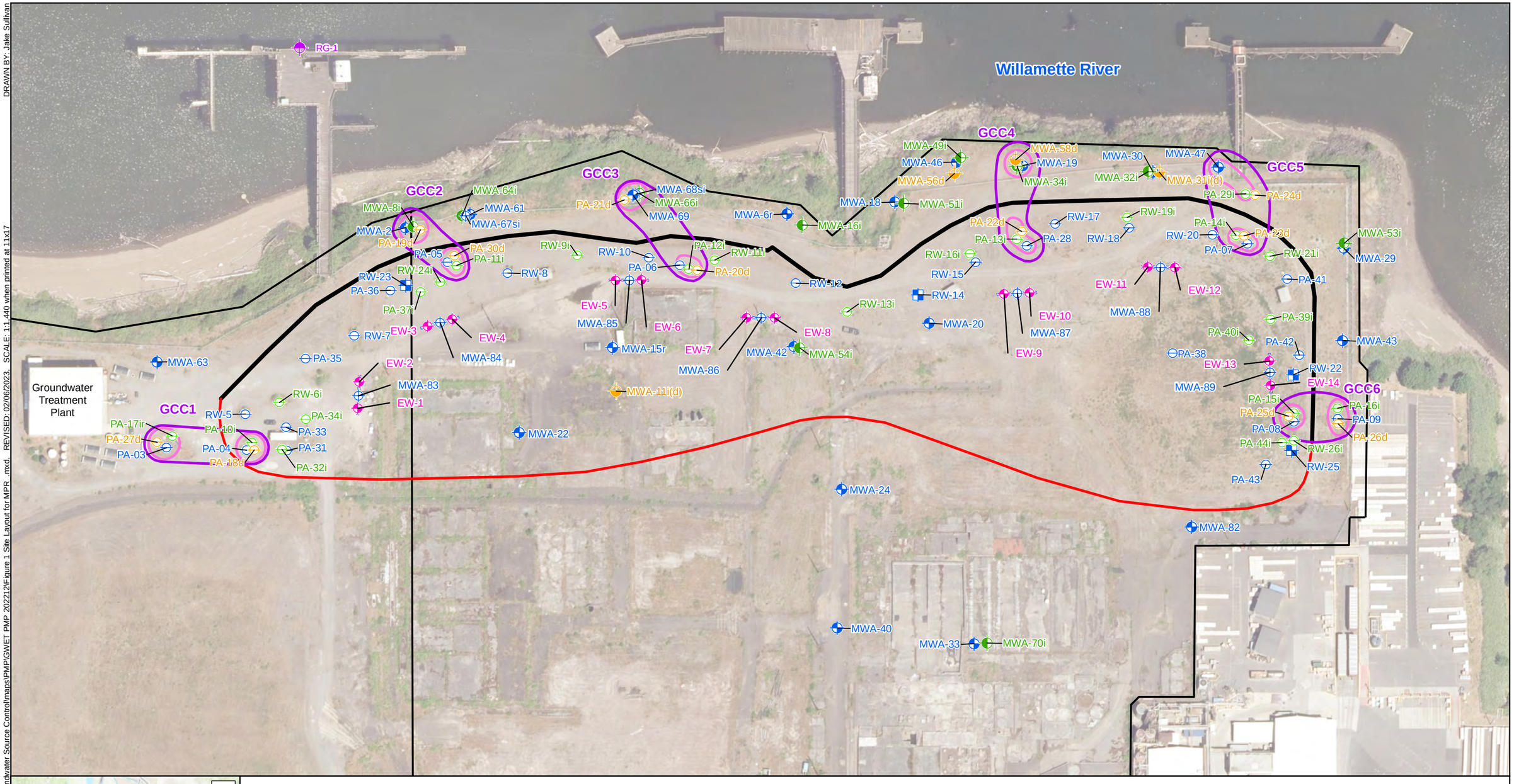
FIGURE 2: APRIL 2024 SHALLOW ZONE GROUNDWATER CONTOURS

FIGURE 3: APRIL 2024 INTERMEDIATE ZONE GROUNDWATER CONTOURS

FIGURE 4: APRIL 2024 DEEP ZONE GROUNDWATER CONTOURS

FIGURE 5: APRIL 2024 SHALLOW TO INTERMEDIATE ZONE VERTICAL HEAD DIFFERENCE

FIGURE 6: APRIL 2024 INTERMEDIATE TO DEEP ZONE VERTICAL HEAD DIFFERENCE



Legend

- Shallow Zone Monitoring Well
- Intermediate Zone Monitoring Well
- Shallow-Intermediate Zone Monitoring Well
- Deep Zone Monitoring Well
- Shallow Zone Piezometer
- Intermediate Zone Piezometer
- Deep Zone Piezometer
- Shallow Zone Recovery Well
- River Gauge
- Trench Extraction Well
- Target Capture Zone
- Barrier Wall Alignment
- Parcel and Property Boundaries

GradientClusters

Type

- Gradient Control Cluster
- Vertical Flow Cluster
- Extraction Trench

N

0 120 240

Feet

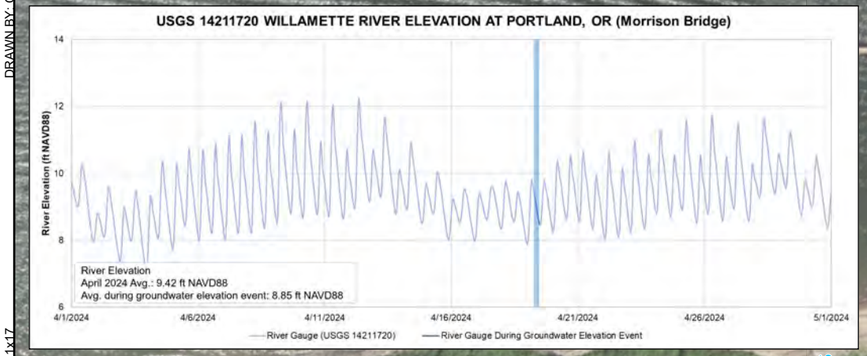
Figure 1
Site Layout
Monthly Progress Report
Groundwater Source Control Measure
Arkema Inc.
Portland, Oregon

Environmental Resources Management
www.erm.com

Source: City of Portland Aerial Imagery, flown Summer 2021; NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl

DRAWN BY: Jake Sullivan

M:\US\Projects\S-U\Total\Arkema_Portland\Groundwater Source Control\maps\PMP\GWET PMP 2022\2Figure 1 Site Layout for MPR_mxd_ REVISED 02/06/2023 SCALE: 1:1,440 when printed at 11x17



Willamette River

Groundwater Treatment Plant

Sand Filter Basin

Detention Basin

RP-02-31 14.30
MWA-63 14.03
PA-35 12.91
RW-05 24.51
PA-33 27.40
MWA-83 13.48
PA-03 27.31
PA-31 27.95
PA-04 28.02
MWA-22 16.30
MWA-24 16.86
MWA-40 20.76
MWA-33 21.21
RP-10-30 31.18
MWA-71 32.46
MWA-72 32.05
MWA-73 31.68
MWA-2 9.65
MWA-61 9.74
MWA-69 10.03
RW-23 12.45
PA-36 12.17
PA-05 12.45
RW-10 13.07
PA-06 12.91
RW-08* 12.58
MWA-85 -0.68
RW-07 12.73
MWA-84 11.14
MWA-15r 13.27
RW-12 14.48
MWA-86 13.99
MWA-42 14.44
RW-15 15.22
RW-14 15.10
MWA-20 15.21
MWA-46 9.99
MWA-19 10.00
MWA-18 10.19
RW-17 14.95
RW-18 14.74
RW-20 15.07
PA-07*
MWA-47 9.67
MWA-29 10.19
PA-28 15.49
MWA-87 2.17
MWA-88 0.69
PA-41 13.80
PA-38 15.31
PA-42 13.54
MWA-43 10.83
MWA-89 5.36
RW-22 14.27
PA-08 13.47
PA-09 12.50
RW-25*
PA-43 14.11
MWA-41 13.05
MWA-82 15.58

Legend

- Shallow Zone Piezometer
- Shallow Zone Monitoring Well
- Active Recovery Well; Not Used During Contouring
- Shallow-Intermediate Zone Monitoring Well
- 27.70 Groundwater Elevation (ft NAVD88)
- Shallow Zone Groundwater Contours (ft NAVD88) Dashed where Inferred
- Target Capture Zone
- Barrier Wall Alignment
- Extraction Trench (Not To Scale)

Notes:
* Value not used for contouring.
Water levels collected April 19, 2024.
ft NAVD88: feet North American Vertical Datum of 1988.
Aerial Photo: City of Portland, Summer 2017.

N

0 160 320
Feet

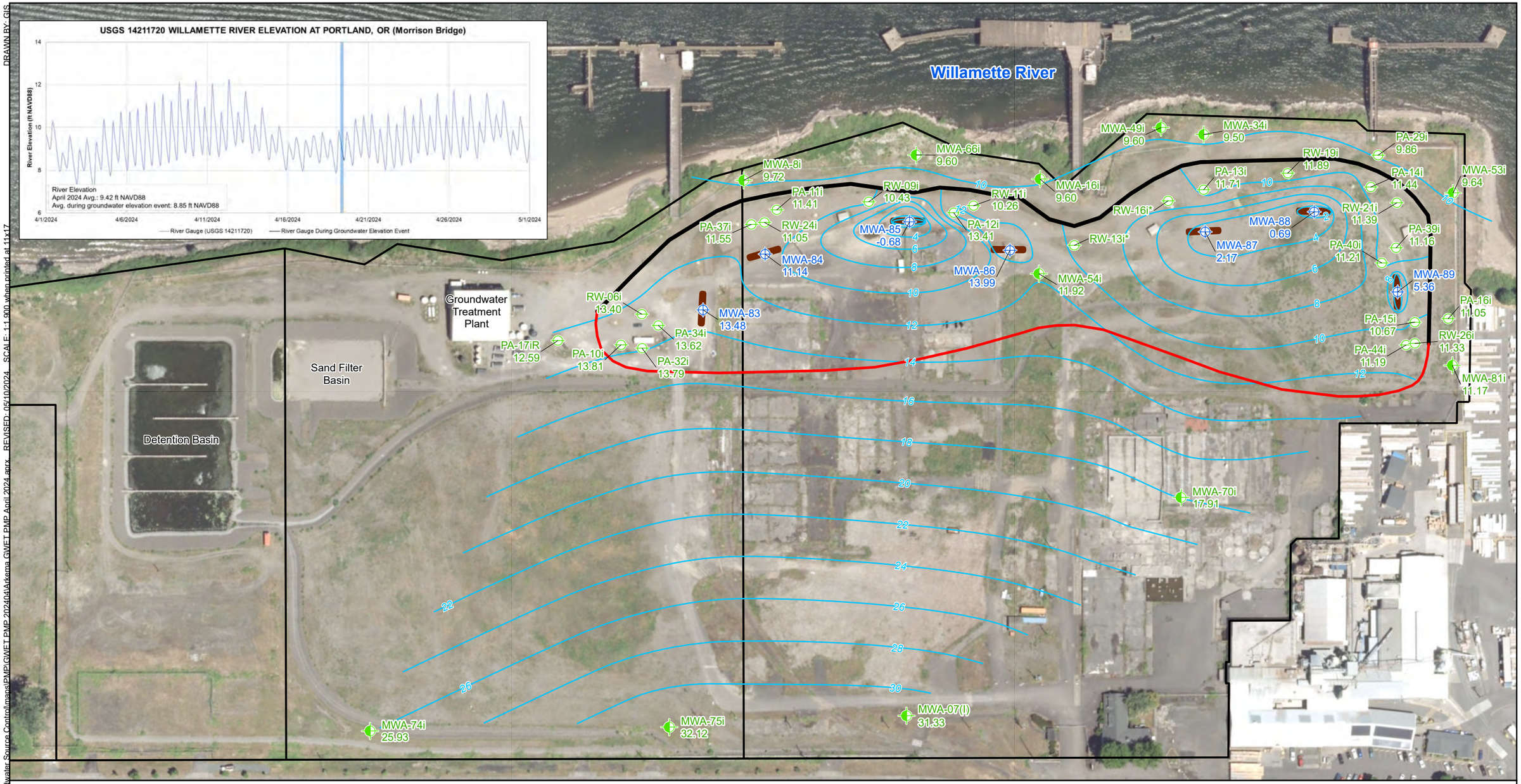
Figure 2
April 2024 Shallow Zone Groundwater Contours
Monthly Progress Report
Groundwater Source Control Measures
Arkema Inc.
Portland, Oregon

Environmental Resources Management
www.erm.com
ERM

NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl

M:\US\Projects\S_UT\tal\Arkema_Portland\Groundwater Source Control\maps\PMP\GWET PMP 2024\04\Arkema GWET PMP April 2024.aprx REVISED: 05/10/2024 SCALE: 1:1,900 when printed at 11x17

DRAWN BY: GIS



Legend

- Intermediate Zone Piezometer
- Intermediate Zone Monitoring Well
- Shallow-Intermediate Zone Monitoring Well
- 27.70 Groundwater Elevation (ft NAVD88)
- Intermediate Zone Groundwater Contours (ft NAVD88) Dashed where Inferred
- Target Capture Zone
- Barrier Wall Alignment
- Extraction Trench (Not To Scale)

Notes:
* Value not used for contouring.
Water levels collected April 19, 2024.
ft NAVD88: feet North American Vertical Datum of 1988.
Aerial Photo: City of Portland, Summer 2017.

N

0 160 320
Feet

Figure 3
April 2024 Intermediate Zone Groundwater Contours
Monthly Progress Report
Groundwater Source Control Measures
Arkema Inc.
Portland, Oregon

Environmental Resources Management
www.erm.com
ERM

NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl

M:\US\Projects\SLU\Total\Arkema_Portland\Groundwater Source Control\maps\PMP\GWET PMP 20240424\Arkema GWET PMP April 2024.aprx REVISED: 05/10/2024 SCALE: 1:1,900 when printed at 11x17

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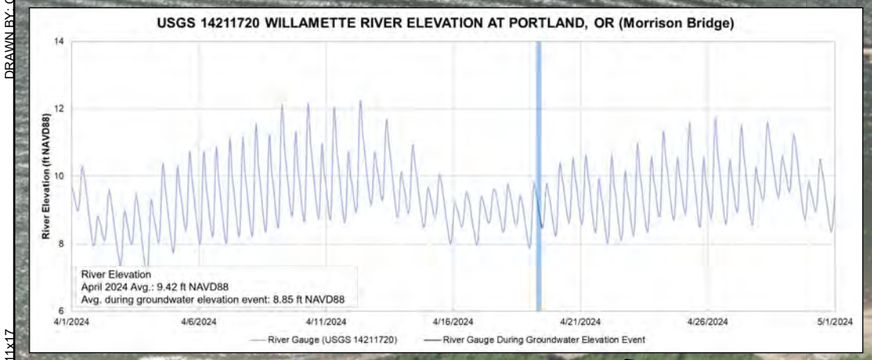


Legend

- Deep Zone Piezometer
- Deep Zone Monitoring Well
- Gravel Zone Monitoring Well
- 27.70 Groundwater Elevation (ft NAVD88)
- Deep Zone Groundwater Contours (ft NAVD88) Dashed where Inferred
- Target Capture Zone
- Barrier Wall Alignment

Notes:
* Value not used for contouring.
Gravel zone wells not used in contouring.
Water levels collected April 19, 2024.
ft NAVD88: feet North American Vertical Datum of 1988.
Aerial Photo: City of Portland, Summer 2017.

N

0 160 320
Feet

Figure 4
April 2024 Deep Zone Groundwater Contours
Monthly Progress Report
Groundwater Source Control Measures
Arkema Inc.
Portland, Oregon

Environmental Resources Management
www.erm.com
ERM

NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl

M:\US\Projects\S-L\OT\Arkema_Portland\Groundwater Source Control\maps\PMR\GWET PMR 202404\Arkema GWET PMR April 2024.aprx REVISED: 06/10/2024 SCALE: 1:1,900 when printed at 11x17

DRAWN BY: GIS

Legend

- Shallow Zone Monitoring Well
- Intermediate Zone Monitoring Well
- Shallow Zone Piezometer
- Intermediate Zone Piezometer
- Shallow Zone Recovery Well
- Target Capture Zone
- Barrier Wall Alignment
- Gradient Control Cluster
- Vertical Flow Cluster
- Downward Flow
- Upward Flow
- Vertical Gradient not calculated due to anomalous groundwater elevation reading

Notes:
Brown gradient: Downward flow.
Green gradient: Upward flow.
Vertical gradient calculated as shallow zone minus intermediate zone potentiometric surfaces.
Water levels collected April 19, 2024.
Aerial Photo: City of Portland, Summer 2017.

N
0 130 260
Feet

Figure 5
April 2024 Shallow to Intermediate Zone Vertical Head Difference
Monthly Progress Report
Groundwater Source Control Measures
Arkema Inc.
Portland, Oregon

Environmental Resources Management
www.erm.com
ERM

NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl

Willamette River

Groundwater Treatment Plant

Sand Filter Basin

0.82
MWA-8i
MWA-64i
PA-19d
GCC2
PA-30d
PA-11i
RW-24i
PA-37i
0.22

0.09
PA-21d
MWA-66i
GCC3
PA-12i
RW-11i
PA-20d
0.20

RW-9i
MWA-16i
MWA-49i
MWA-56d
MWA-51i
0.02
MWA-58d
GCC4
MWA-34i
PA-22d
PA-13i
RW-16i
0.06

RW-13i
MWA-54i
MWA-11I(d)

0.02
MWA-32i
MWA-31I(d)
PA-29i
PA-24d
GCC5
RW-19i
PA-14i
PA-23d
RW-21i
MWA-53i
0.05
PA-39i
PA-40i

RW-6i
PA-34i
PA-17ir
PA-27d
GCC1
PA-10i
PA-18d
PA-32i
0.19
0.26

0.02
PA-15i
PA-25d
GCC6
PA-16i
-0.02
PA-26d
PA-44i
RW-26i

MWA-70i

Legend

- Intermediate Zone Monitoring Well
- Deep Zone Monitoring Well
- Intermediate Zone Piezometer
- Deep Zone Piezometer
- Target Capture Zone
- Barrier Wall Alignment
- Gradient Control Cluster
- Vertical Flow Cluster
- Downward Flow
- Upward Flow

Notes:
Brown gradient: Downward flow.
Green gradient: Upward flow.
Vertical gradient calculated as intermediate zone minus deep zone potentiometric surfaces.
Water levels collected April 19, 2024.
Aerial Photo: City of Portland, Summer 2017.

N

0 130 260
Feet

Figure 6
April 2024 Intermediate to Deep Zone Vertical Head Difference
Monthly Progress Report
Groundwater Source Control Measures
Arkema Inc.
Portland, Oregon

Environmental Resources Management
www.erm.com
ERM

NAD 1983 StatePlane Oregon North FIPS 3601 Feet Intl

M:\US\Projects\S_U\Total\Arkema_Portland\Groundwater Source Control\maps\PMP\GWET PMP 2024\04\Arkema GWET PMP April 2024.aprx - REVISED: 05/10/2024 - SCALE: 1:1,560 when printed at 11x17

DRAWN BY: GIS

ATTACHMENT A-1 TRANSDUCER FLAGS

Attachment A-1. Transducer Flags

Table A-1
Transducer Malfunction Log: April 2024
Arkema Inc. Facility
Portland, Oregon

Gradient Cluster	Transducer	Interval	Date Range		Issue and Repairs Performed
N/A	RW-13	Intermediate	1/29/2024	4/16/2024	Transducer faulted, checked and replaced.
N/A	RW-25	Shallow	1/29/2024	4/16/2024	Transducer faulted, checked and repaired.
GCC3	PA-26d	Deep	1/29/2024	5/1/2024	Transducer faulted and replaced.
GCC5	PA-07	Shallow	1/29/2024	5/1/2024	Transducer faulted and replaced.

Notes:

I/O = input/output

LOTO = lockout/tagout

VFD = variable frequency drive

ATTACHMENT A-2 RECOVERY WELL STATUS

Attachment A-2. Recovery Well Status

Table A-2
Recovery Well Status: April 2024
Arkema Inc. Facility
Portland, Oregon

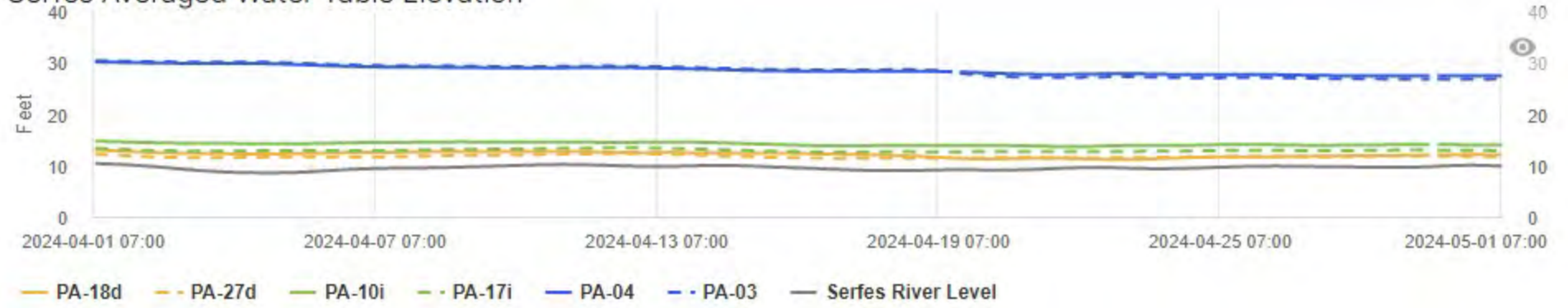
Recovery Well ID	Status as of 4/30/2024 (active or inactive)	Issue	Actions to get online	Expected date back online	Transducer Status	Totalizer Status	Average Operational Flow Rate (gpm)	Overall Extraction Rate	Notes
RW-14	Inactive	None	N/A	N/A	Good	Good	0.00	OFF*	Not turned on
RW-22	Inactive	Ground Fault	Replace cable leads	N/A	Good	Good	0.00	OFF*	Cable leads need to be replaced
RW-23	Inactive	None	Redeploy clean pump	N/A	Good	Good	0.00	OFF*	To be switched from 1hp to 0.5hp pump
RW-25	Active	Transducer Malfuction	Repaired transducer	4/16/2024	Good	Good	2.37	M**	Repaired transducer and pump operating as of 4/17
EW-01	Inactive	None	Chemical Redevelopment	N/A	Good	Good	0.00	OFF*	Waiting on UIC permit
EW-02	Inactive	None	Chemical Redevelopment	N/A	Good	Good	0.00	OFF*	Waiting on UIC permit
EW-03	Active	None	N/A	N/A	Good	Good	4.93	G	
EW-04	Active	None	N/A	N/A	Good	Good	5.03	G	
EW-05	Active	None	N/A	N/A	Good	Good	6.49	G	
EW-06	Active	None	N/A	N/A	Good	Good	4.40	G	
EW-07	Inactive	Load Fault	Change out fouled pump	5/1/2024	Good	Good	0.32	OFF*	Fouled pump to be changed out with clean pump
EW-08	Active	Motor Overload Fault	Change out fouled pump	5/3/2024	Good	Good	4.77	G**	Motor overload at higher frequency, possibly change motor
EW-09	Active	None	N/A	N/A	Good	Good	2.66	M	
EW-10	Active	None	N/A	N/A	Good	Good	3.46	G	
EW-11	Active	None	N/A	N/A	Good	Good	2.78	M**	
EW-12	Active	None	N/A	N/A	Good	Good	3.38	G	
EW-13	Active	None	N/A	N/A	Good	Good	3.91	G	
EW-14	Active	None	N/A	N/A	Good	Good	6.42	G	

Notes:
* Recovery wells not in service
** Recovery wells in service part of the month
G = good pumping, greater than 3.0 gpm
gpm = gallons per minute
M = moderate pumping, greater than 1.0 gpm and less than 3.0
P = poor pumping, less than 1.0 gpm
VFD = variable frequency drive
PA = piezometer

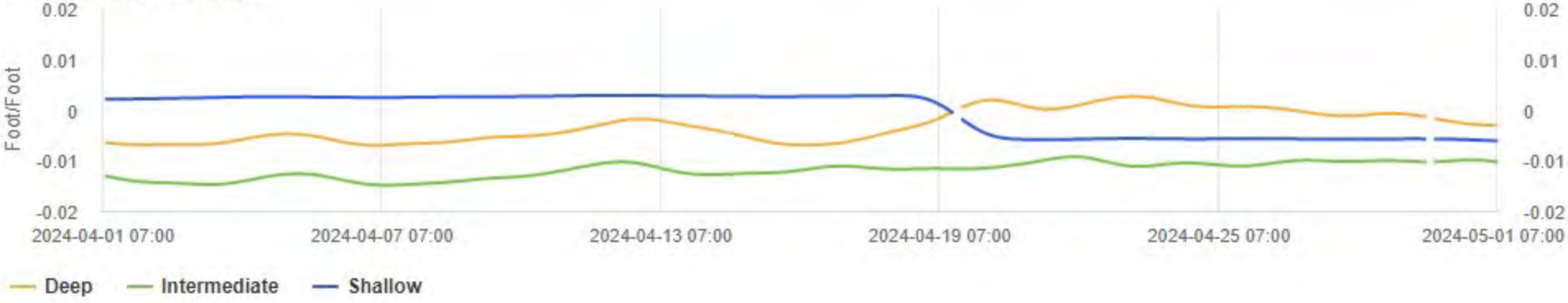
ATTACHMENT B-1 GRADIENT HYDROGRAPHS

Gradient Control Cluster 1

Serfes Averaged Water Table Elevation



Horizontal Gradient

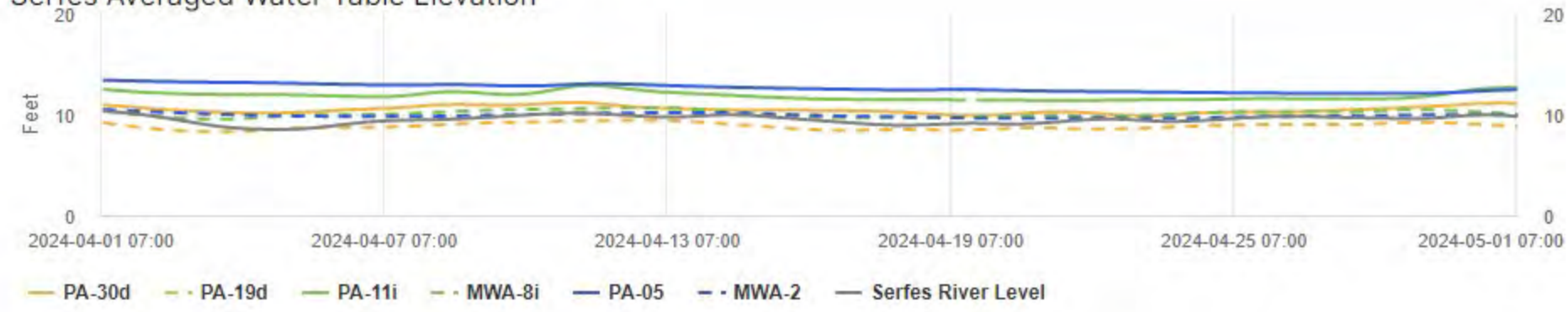


Vertical Gradient

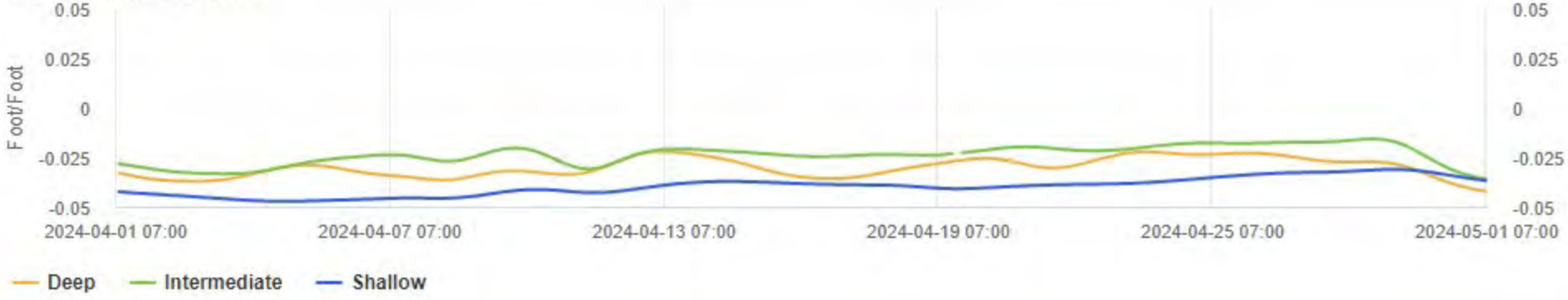
Notes:
Positive gradient indicates inward horizontal gradient and downward vertical gradient
Vertical Gradient calculated using (WTE_upper - WTE_lower)/(Bottom of Screen_upper - Top of Screen_lower)
Horizontal gradient calculated as Exterior – Interior. Interior: Upland of the GWBW, Exterior: Riverside of the GWBW
SZ = Shallow Zone
IZ = Intermediate Zone
DZ = Deep Zone

Gradient Control Cluster 2

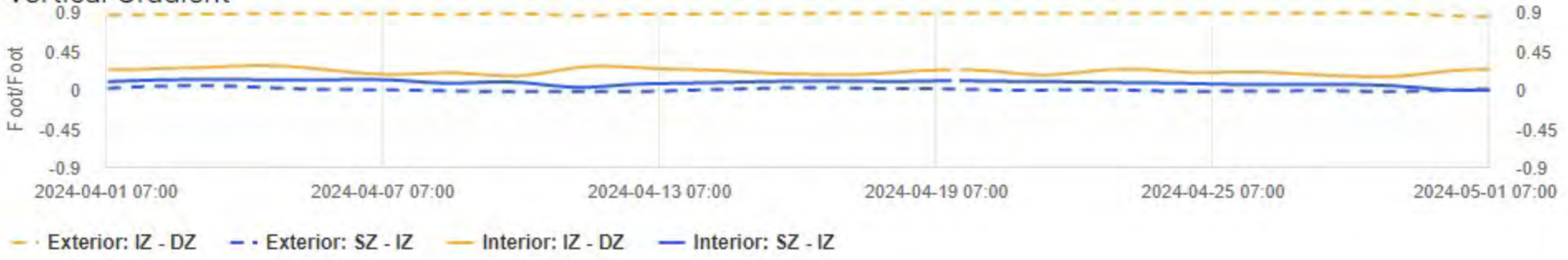
Serfes Averaged Water Table Elevation



Horizontal Gradient



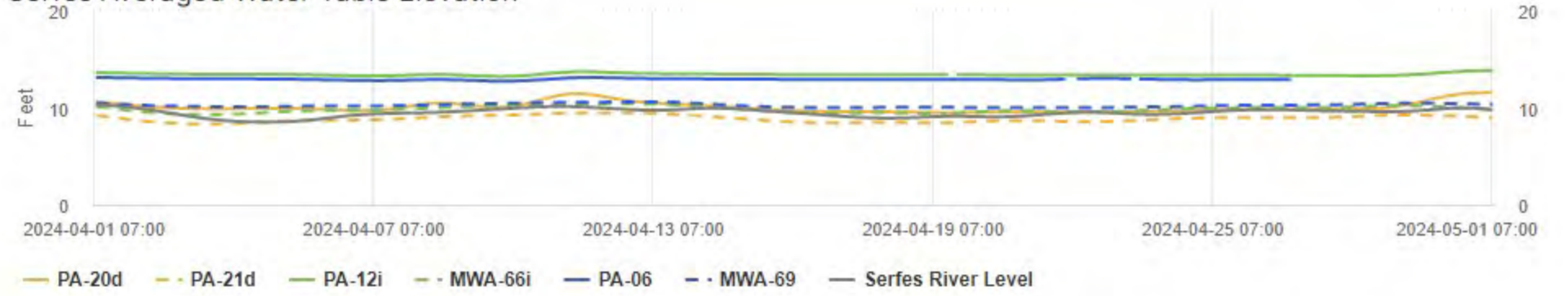
Vertical Gradient



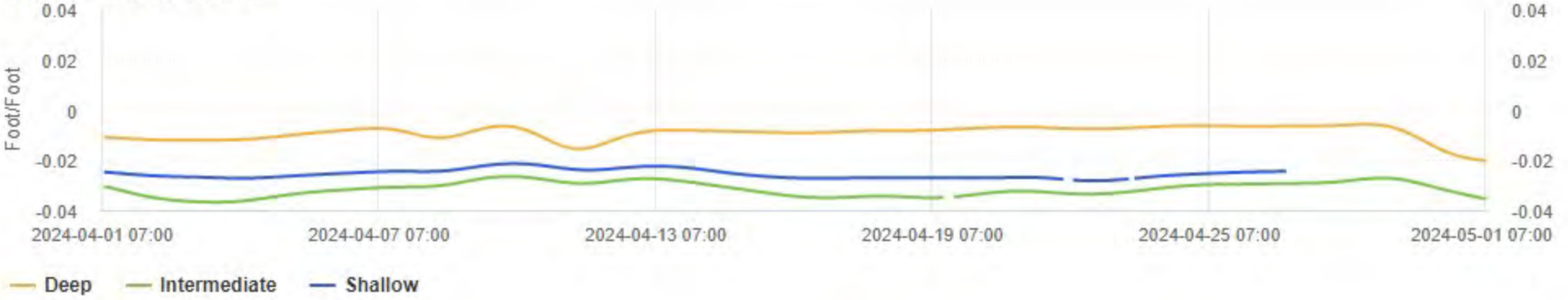
Notes:
Positive gradient indicates inward horizontal gradient and downward vertical gradient
Vertical Gradient calculated using (WTE_upper - WTE_lower)/(Bottom of Screen_upper - Top of Screen_lower)
Horizontal gradient calculated as Exterior – Interior. Interior: Upland of the GWBW, Exterior: Riverside of the GWBW
SZ = Shallow Zone
IZ = Intermediate Zone
DZ = Deep Zone

Gradient Control Cluster 3

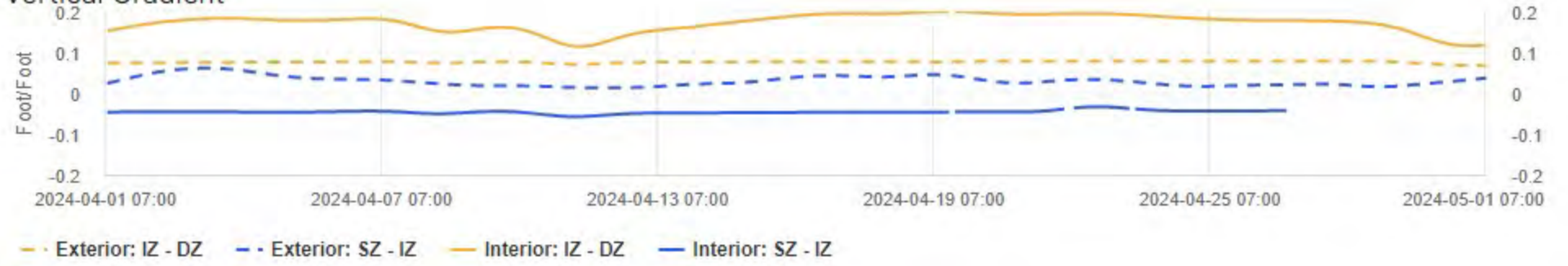
Serfes Averaged Water Table Elevation



Horizontal Gradient



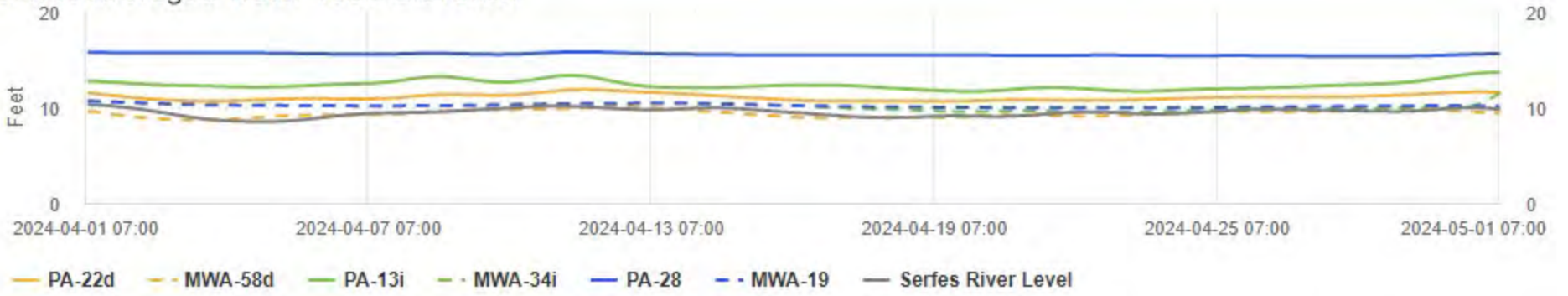
Vertical Gradient



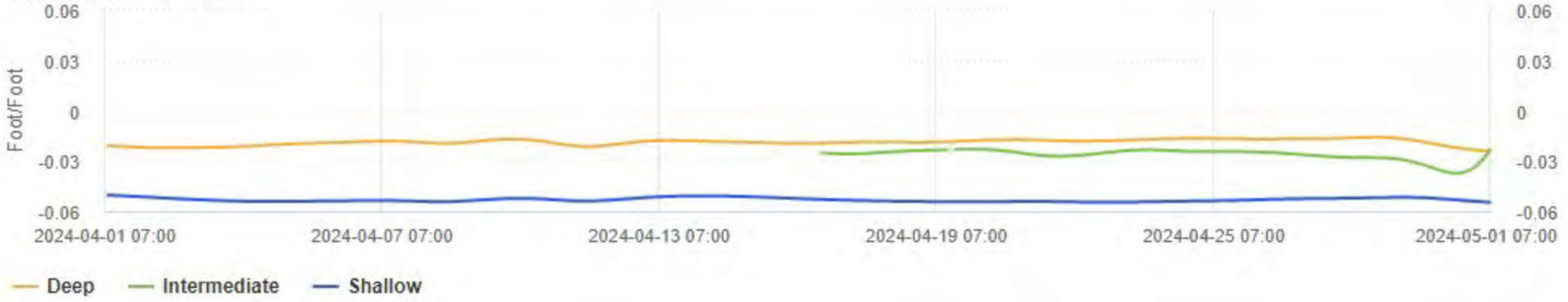
Notes:
Positive gradient indicates inward horizontal gradient and downward vertical gradient
Vertical Gradient calculated using (WTE_upper - WTE_lower)/(Bottom of Screen_upper - Top of Screen_lower)
Horizontal gradient calculated as Exterior – Interior. Interior: Upland of the GWBW, Exterior: Riverside of the GWBW
SZ = Shallow Zone
IZ = Intermediate Zone
DZ = Deep Zone

Gradient Control Cluster 4

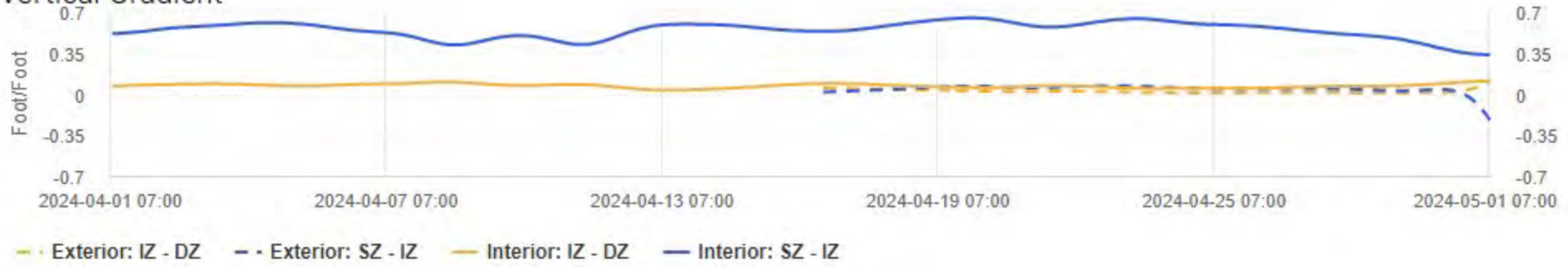
Serfes Averaged Water Table Elevation



Horizontal Gradient



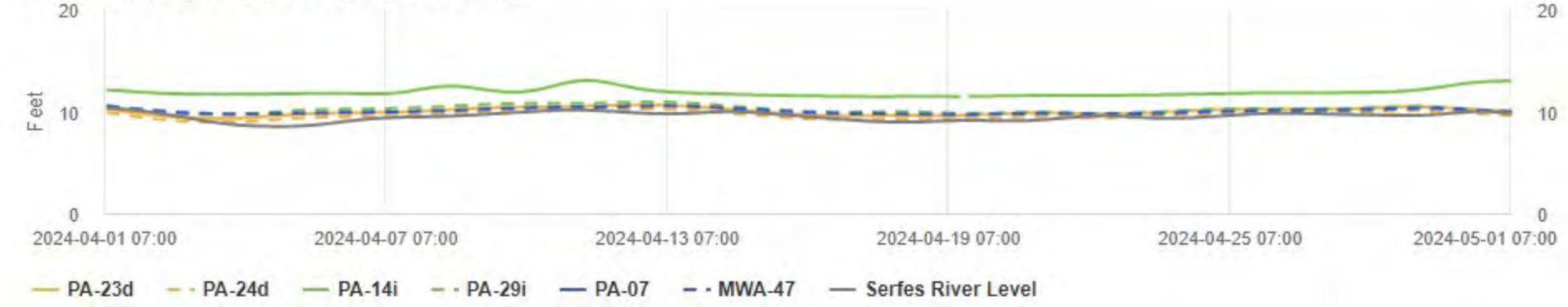
Vertical Gradient



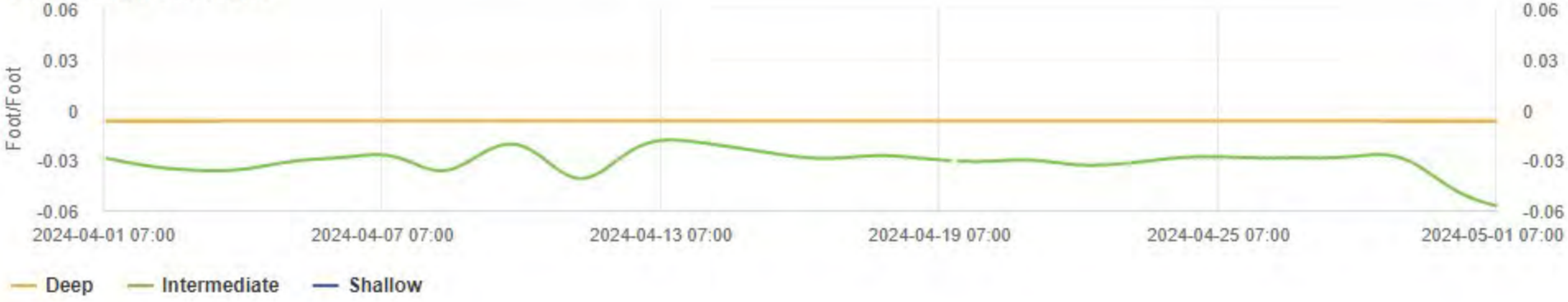
Notes:
Positive gradient indicates inward horizontal gradient and downward vertical gradient
Vertical Gradient calculated using (WTE_upper - WTE_lower)/(Bottom of Screen_upper - Top of Screen_lower)
Horizontal gradient calculated as Exterior – Interior. Interior: Upland of the GWBW, Exterior: Riverside of the GWBW
SZ = Shallow Zone
IZ = Intermediate Zone
DZ = Deep Zone

Gradient Control Cluster 5

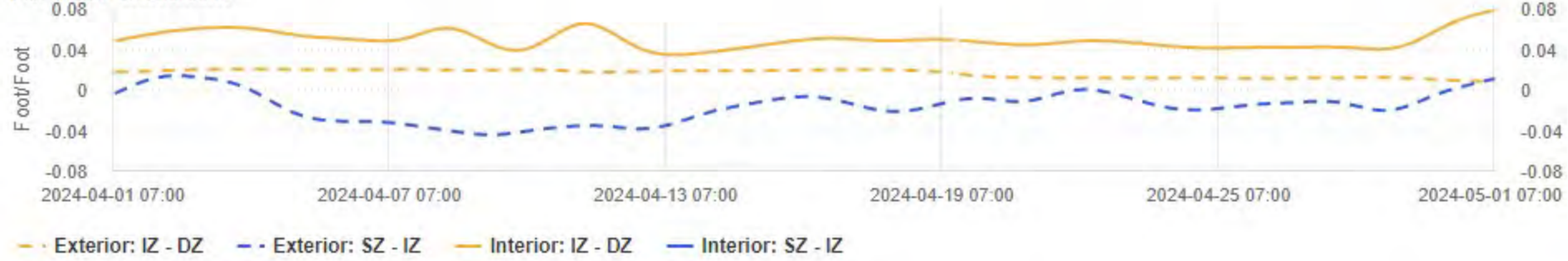
Serfes Averaged Water Table Elevation



Horizontal Gradient

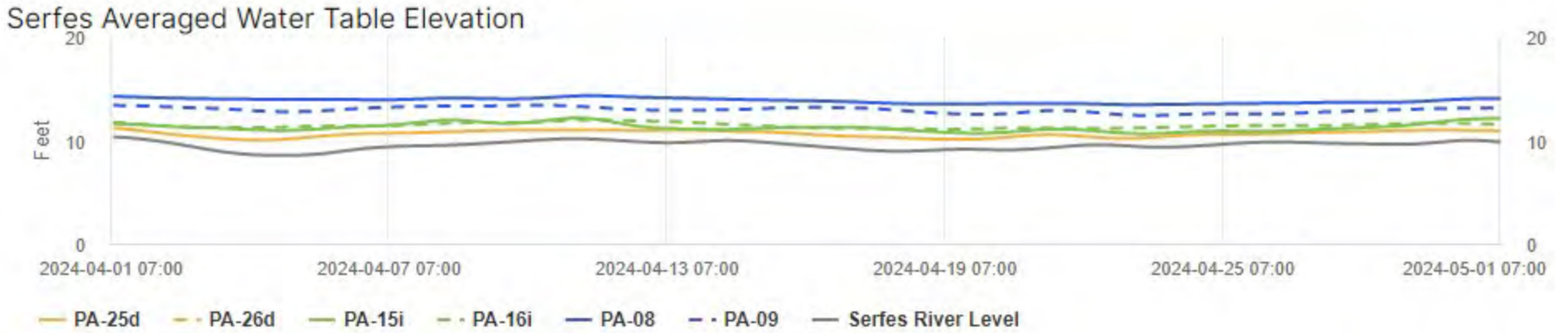


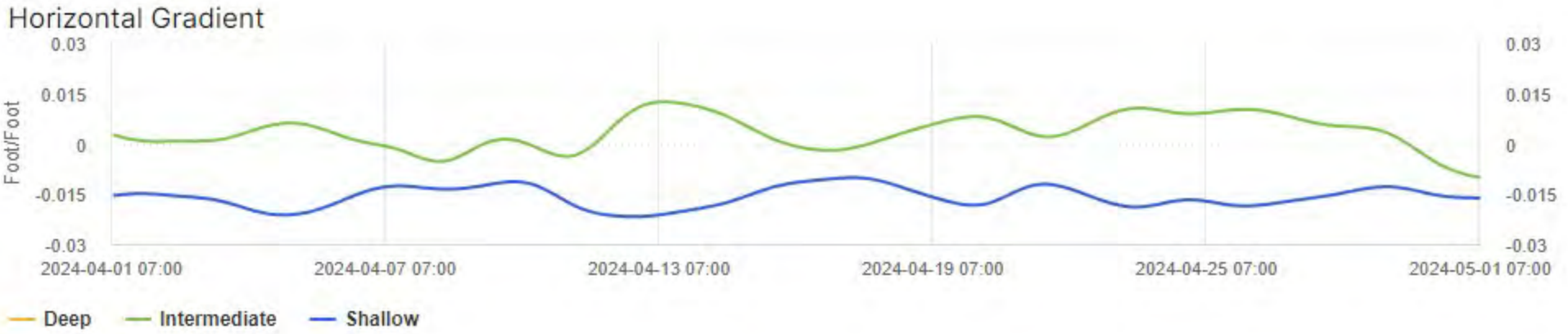
Vertical Gradient

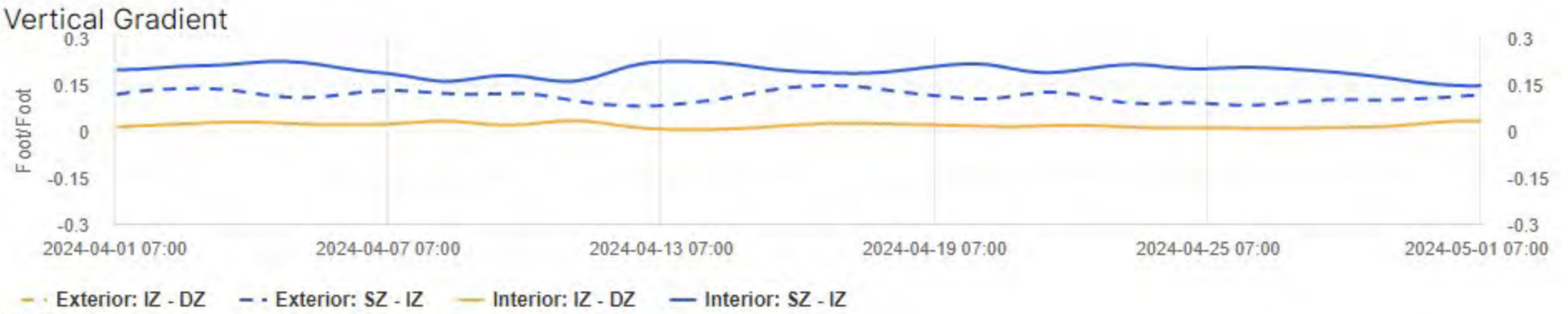


Notes:
Positive gradient indicates inward horizontal gradient and downward vertical gradient
Vertical Gradient calculated using (WTE_upper - WTE_lower)/(Bottom of Screen_upper - Top of Screen_lower)
Horizontal gradient calculated as Exterior – Interior. Interior: Upland of the GWBW, Exterior: Riverside of the GWBW
SZ = Shallow Zone
IZ = Intermediate Zone
DZ = Deep Zone

Gradient Control Cluster 6





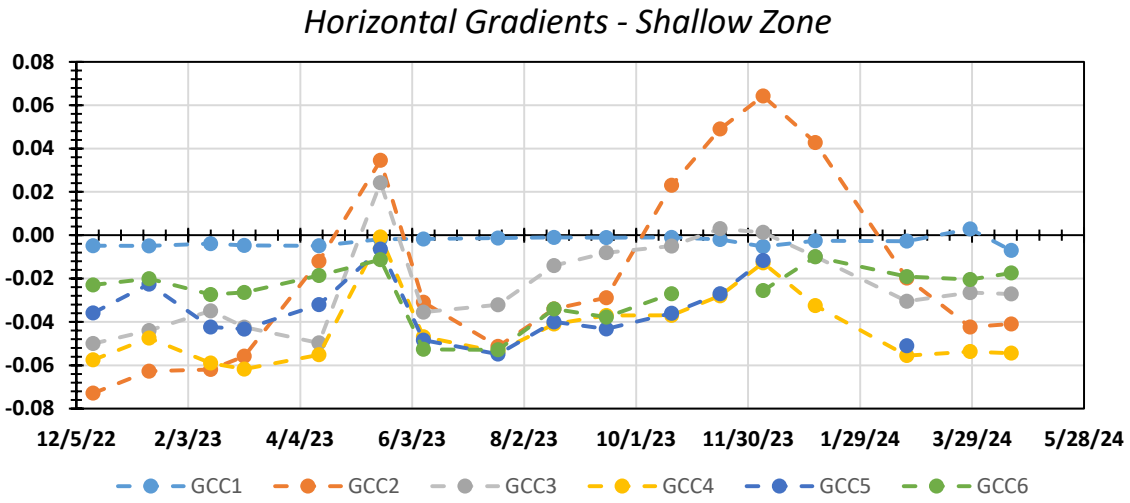


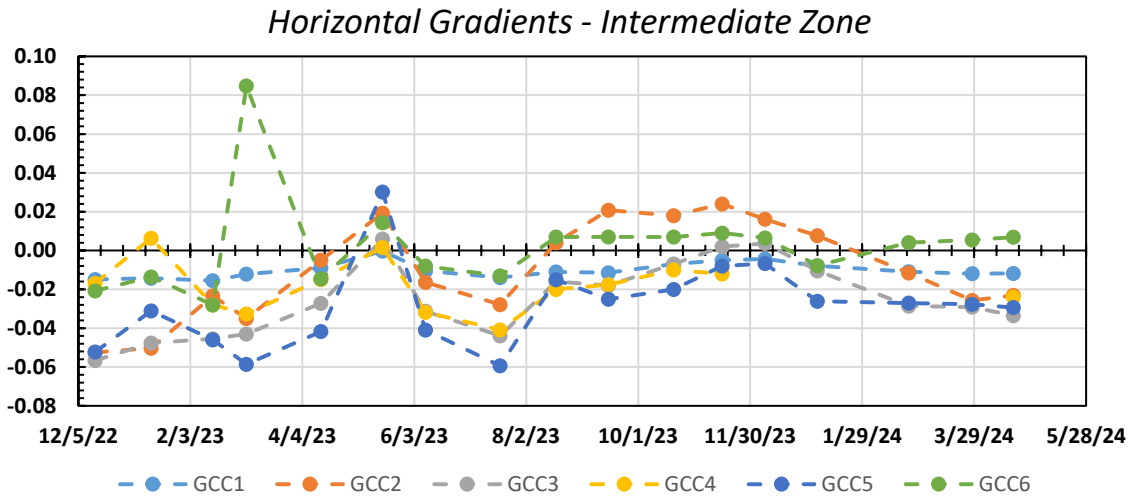
Notes:
Positive gradient indicates inward horizontal gradient and downward vertical gradient
Vertical Gradient calculated using (WTE_upper - WTE_lower)/(Bottom of Screen_upper - Top of Screen_lower)
Horizontal gradient calculated as Exterior – Interior. Interior: Upland of the GWBW, Exterior: Riverside of the GWBW
SZ = Shallow Zone
IZ = Intermediate Zone
DZ = Deep Zone

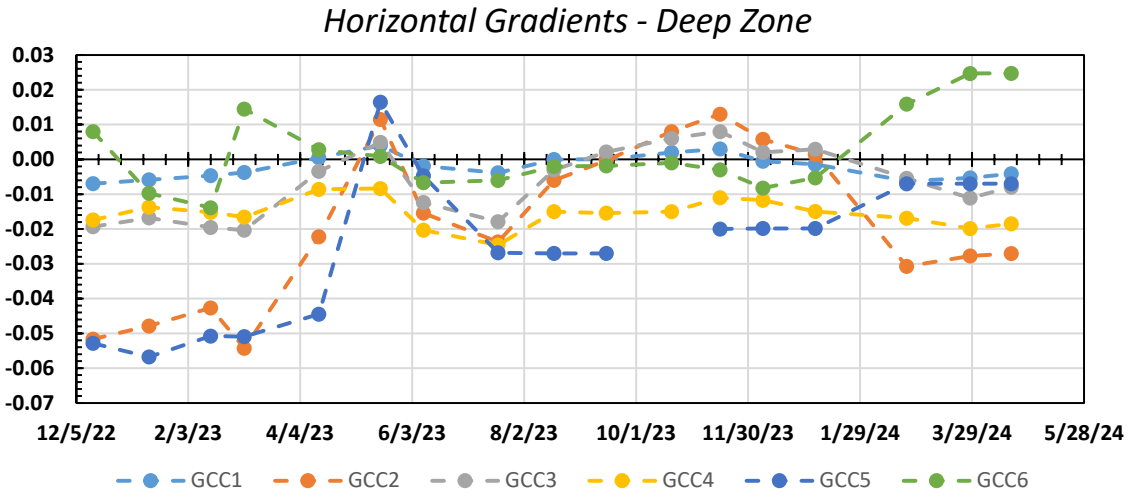
ATTACHMENT B-2 HORIZONTAL GRADIENTS

Attachment B-2

Horizontal Gradients Summary: April 2024
Arkema Inc. Facility
Portland, Oregon







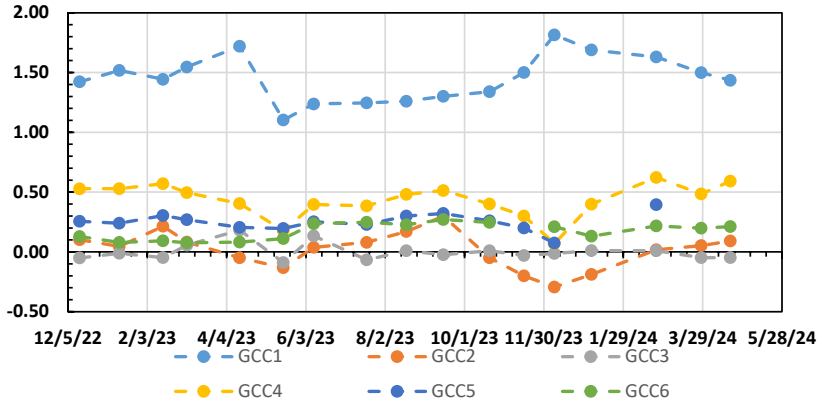
Positive horizontal gradient indicates an inward hydraulic gradient across the GWBW.

ATTACHMENT B-3 VERTICAL GRADIENTS

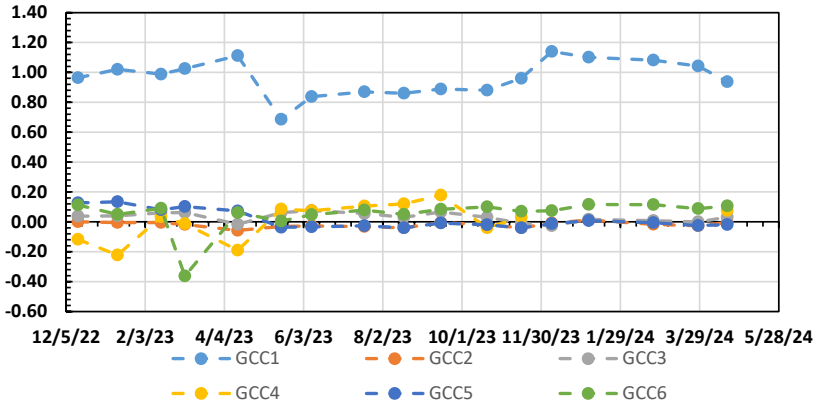
Attachment B-3

Vertical Gradients Summary: April 2024
Arkema Inc. Facility
Portland, Oregon

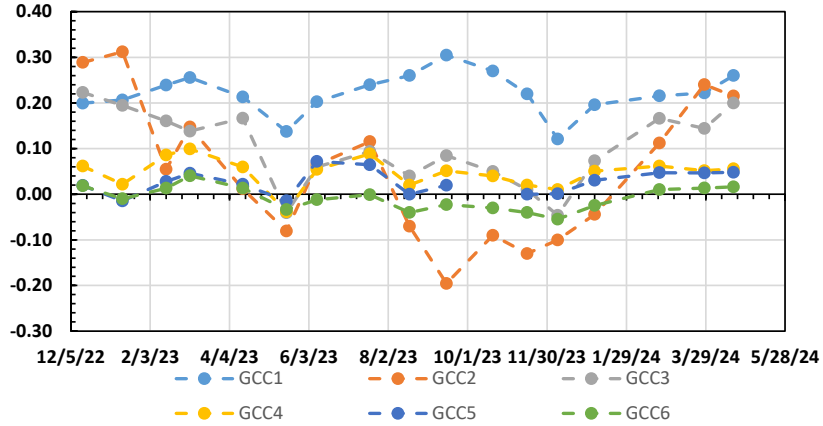
Vertical Gradients - Interior SZ-IZ



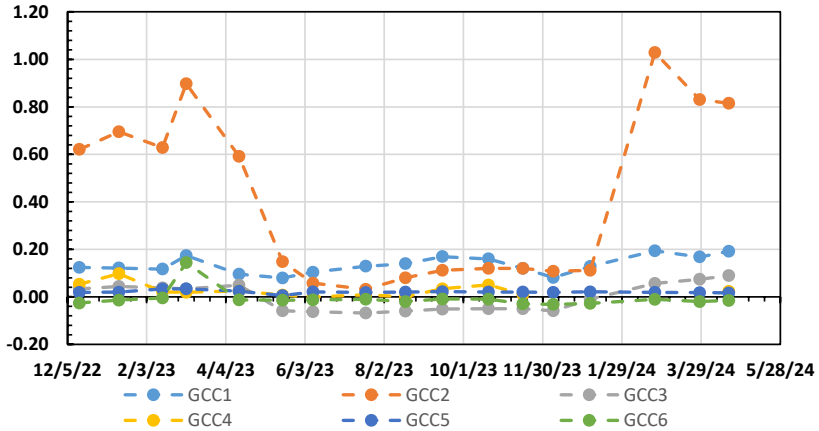
Vertical Gradients - Exterior SZ-IZ



Vertical Gradients - Interior IZ-DZ

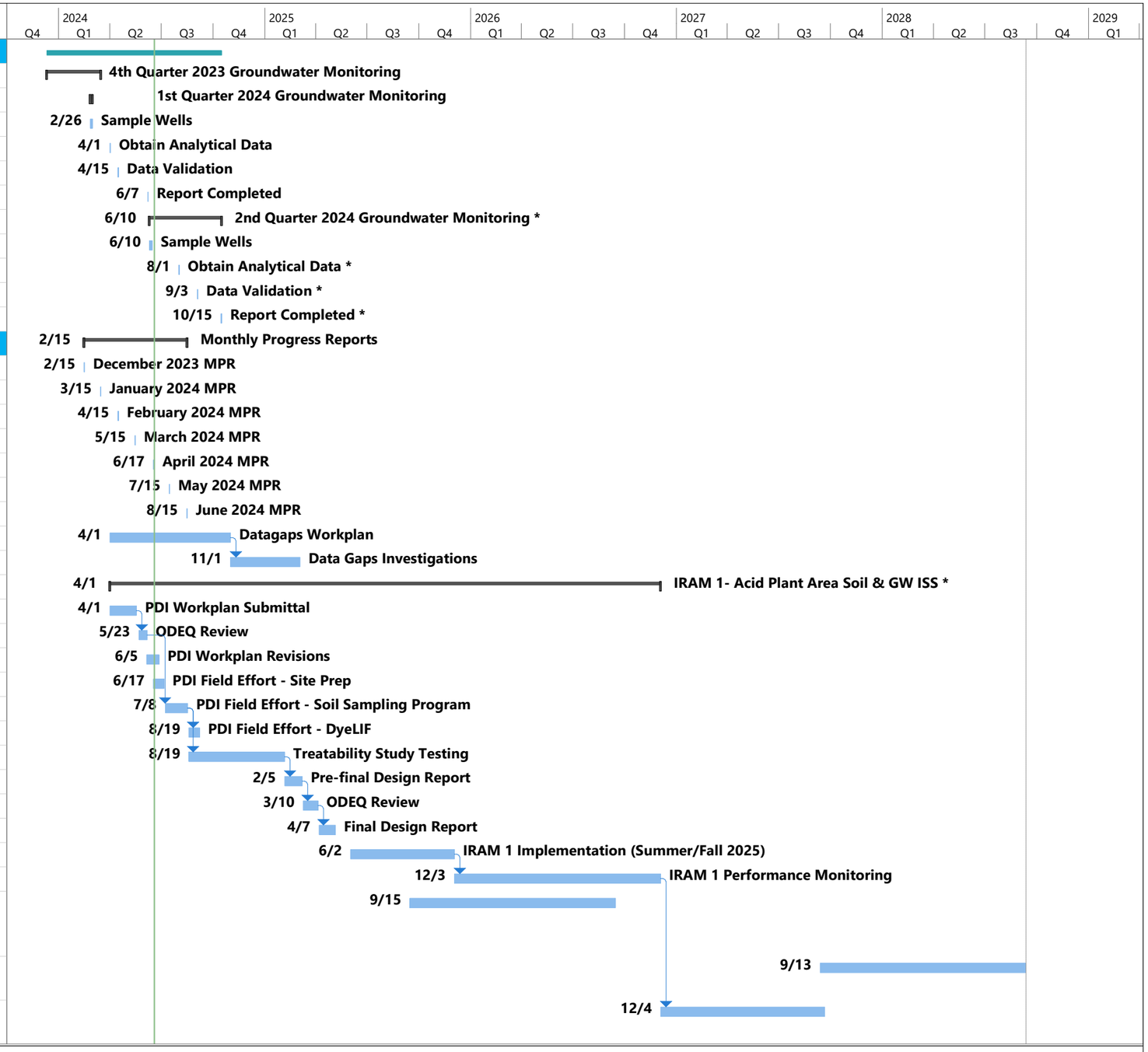


Vertical Gradients - Exterior IZ-DZ



ATTACHMENT C PROJECT SCHEDULE

ID	Task Name	Duration	Start	Finish
1	**Quarterly GW Monitoring**			
2	4th Quarter 2023 Groundwater Monitoring	70 days	Mon 12/11/23	Fri 3/15/24
7	**1st Quarter 2024 Groundwater Monitoring**	**4 days**	**Mon 2/26/24**	**Thu 2/29/24**
8	*Sample Wells*	*4 days*	*Mon 2/26/24*	*Thu 2/29/24*
9	*Obtain Analytical Data*	*1 day*	*Mon 4/1/24*	*Mon 4/1/24*
10	*Data Validation*	*1 day*	*Mon 4/15/24*	*Mon 4/15/24*
11	*Report Completed*	*1 day*	*Fri 6/7/24*	*Fri 6/7/24*
12	**2nd Quarter 2024 Groundwater Monitoring ***	**92 days**	**Mon 6/10/24**	**Tue 10/15/24**
13	*Sample Wells*	*5 days*	*Mon 6/10/24*	*Fri 6/14/24*
14	Obtain Analytical Data *	1 day	Thu 8/1/24	Thu 8/1/24
15	Data Validation *	1 day	Tue 9/3/24	Tue 9/3/24
16	Report Completed *	1 day	Tue 10/15/24	Tue 10/15/24
17	**Monthly Progress Reports**	**132 days**	**Thu 2/15/24**	**Thu 8/15/24**
18	*December 2023 MPR*	*1 day*	*Thu 2/15/24*	*Thu 2/15/24*
19	*January 2024 MPR*	*1 day*	*Fri 3/15/24*	*Fri 3/15/24*
20	*February 2024 MPR*	*1 day*	*Mon 4/15/24*	*Mon 4/15/24*
21	*March 2024 MPR*	*1 day*	*Wed 5/15/24*	*Wed 5/15/24*
22	April 2024 MPR	1 day	Mon 6/17/24	Mon 6/17/24
23	May 2024 MPR	1 day	Mon 7/15/24	Mon 7/15/24
24	June 2024 MPR	1 day	Thu 8/15/24	Thu 8/15/24
25	**Datagaps Workplan**	154 days	Mon 4/1/24	Thu 10/31/24
26	**Data Gaps Investigations**	87 days	Fri 11/1/24	Mon 3/3/25
27	**IRAM 1- Acid Plant Area Soil & GW ISS ***	**699 days**	**Mon 4/1/24**	**Thu 12/3/26**
28	*PDI Workplan Submittal*	*35 days*	*Mon 4/1/24*	*Fri 5/17/24*
29	*ODEQ Review*	*10 days*	*Thu 5/23/24*	*Wed 6/5/24*
30	PDI Workplan Revisions	16 days	Wed 6/5/24	Wed 6/26/24
31	PDI Field Effort - Site Prep	15 days	Mon 6/17/24	Fri 7/5/24
32	PDI Field Effort - Soil Sampling Program	30 days	Mon 7/8/24	Fri 8/16/24
33	PDI Field Effort - DyeLIF	15 days	Mon 8/19/24	Fri 9/6/24
34	Treatability Study Testing	122 days	Mon 8/19/24	Tue 2/4/25
35	Pre-final Design Report	23 days	Wed 2/5/25	Fri 3/7/25
36	ODEQ Review	20 days	Mon 3/10/25	Fri 4/4/25
37	Final Design Report	21 days	Mon 4/7/25	Mon 5/5/25
38	IRAM 1 Implementation (Summer/Fall 2025)	132 days	Mon 6/2/25	Tue 12/2/25
39	IRAM 1 Performance Monitoring	262 days	Wed 12/3/25	Thu 12/3/26
40	**IRAM 2-Enhanced ISCR Perchlorate & CrVI In Chlorate Plant Area, if needed (Summer 2026 implementation)**	261 days	Mon 9/15/25	Mon 9/14/26
41	**IRAM 3-Remove Human Health Direct Contact Hot Spots, if needed (Summer 2028 implementation)**	261 days	Mon 9/13/27	Mon 9/11/28
42	**IRAM 4-Enhanced ISCR of Acid Plant Vicinity, if needed (Summer 2027 implementation)**	207 days	Fri 12/4/26	Mon 9/20/27



Arkema Portland
Monthly Progress Report
Attachment C

Task	Project Summary	Manual Task	Start-only	Deadline
Split	Inactive Task	Duration-only	Finish-only	Progress
Milestone	Inactive Milestone	Manual Summary Rollup	External Tasks	Manual Progress
Summary	Inactive Summary	Manual Summary	External Milestone