February 16, 2026

Mr. Randall Bailey
Oregon Department of Environmental Quality
Northwest Regional Office
700 NE Multnomah St., Suite #600
Portland OR 97232

Re: NPDES Permit Discharge Notification
Pilot Study Water Treatment
Rhône-Poulenc Portland Site
NPDES Permit No. 101180

Dear Mr. Bailey:

Oregon Department of Environmental Quality (DEQ) National Pollution Discharge Elimination System Permit No. 101180 (NPDES Permit) authorizes StarLink Logistics, Inc. (StarLink) to treat and discharge groundwater and stormwater from the Rhône-Poulenc Site (Site) at the on-site water treatment plant (WTP). Under Schedule D, Special Conditions, Paragraph 3 of the NPDES Permit, well development water, decontamination water, and water from remedy evaluation or design studies may also be treated at the WTP, following written notice to DEQ.

This letter is notification of StarLink's intent to treat water generated by a DEQ-approved groundwater remediation pilot study at the Site. The pilot study will evaluate the performance of groundwater extraction via a network of wells for the purpose of hydraulic control. The work is being performed pursuant to Order on Consent DEQ No. WMCSR NWR 99 07. The pilot study is described in the Final Deep Groundwater Hydraulic Control Pilot Study Work Plan (Pilot Study Workplan), which was approved by DEQ on October 29, 2025. The pilot study includes installation, development and operation of five groundwater extraction wells, three groundwater monitoring well clusters, and five piezometer clusters on the Site and adjacent ESCO property.

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Pilot Study Water Treatment Overview

Water to be treated at the WTP during the pilot study includes: 1) well development water associated with monitoring well, piezometer, and extraction well installation; 2) monitoring well sampling purge water, 3) decontamination water associated with well/piezometer installation; and 4) extraction well water from step drawdown testing, short-term pumping tests, short-term constant rate pumping, and long-term constant rate pumping. As described herein, the WTP has the capacity and ability to treat these pilot study waters, with no additional treatment or changes to the WTP needed.

The pilot study wells will be located within two general property locations. The WTP's ability to treat pilot study water is based on data from groundwater monitoring wells in these two locations. Table 1 presents expected average and maximum groundwater concentrations calculated for pilot study water. Parameters include volatile organic compounds (VOCs), chlorinated herbicides, organochlorine insecticides, dioxins/furans (PCDD/PCDFs), semi-volatile organic compounds, metals, and polychlorinated biphenyls (PCBs).

Water generated during the pilot studies will be treated at the WTP using the unit operations currently employed for groundwater/stormwater treatment: initial treatment in the bioreactor, followed by clarification, equalization, and granular activated carbon (GAC) absorption via two GAC units operated in series, prior to discharge to the Willamette River at Outfall 001, under the provisions of the NPDES Permit.

The activities producing pilot study water and anticipated volume of discharge to the WTP are summarized below.

Well Development Water / Monitoring Well Sampling Purge Water / Well Installation Decontamination Water

An estimated 12,000 gallons of well development water, monitoring well sampling purge water, and decontamination water will be generated during extraction well, monitoring well, and piezometer installation and sampling. Well development water is produced by extracting multiple well volumes of water until appropriate low turbidity is attained.

Temporary containment of decontamination water and well development water will be used prior to placement in the WTP. This allows solids to settle during temporary containment.

Extraction Well Step Test Water / Extraction Well Short-term Individual Pumping Test Water

An estimated 10,000 to 24,000 gallons of groundwater will be extracted by step tests conducted on the wells. Following the step tests, short-term individual pumping tests will extract an estimated 3,800 gallons/day.

Groundwater generated during the step tests and short-term individual pumping tests will either be temporarily containerized prior to being pumped to the WTP or pumped directly to the WTP using dedicated piping.

Extraction Well Short-term Constant Rate Pumping Test Water / Extraction Well Long-term Constant Rate Pumping Water

A short-term constant rate pumping test, followed by a long-term constant rate pumping will be conducted for the last portion of the pilot study.

A short-term constant rate pumping test where the 5 extraction wells will be pumped simultaneously and continuously (24 hr/day) for an estimated 15 days will be conducted to finalize the long-term pumping rate. An estimated maximum 40 gallons per minute (gpm) will be pumped under the short-term constant rate pumping tests.

Once the pumping rate is stable, the intent is to continue pumping continuously for the foreseeable future. A groundwater recovery rate range of 20 to 40 gpm for the 5 wells is anticipated.

The extracted groundwater from the constant rate pumping tests will be pumped to the WTP.

Pilot Study Anticipated Schedule

The pilot study is anticipated to be conducted under the following schedule:

- Well Installation; Step drawdown testing: mid-February – April 2026
- Extraction well short-term individual pumping test: May 2026
- Extraction well short-term constant rate pumping test: June 2026
- Extraction well long-term constant rate pumping water: July 2026 - continuing

The schedule is subject to change, based on driller/contractor availability, weather conditions, and construction considerations.

We trust that this information satisfies NPDES Permit notification requirements for the proposed pilot study water. However, if you have any questions or require further information, please contact me at (503) 451-5586 or ryan.stringfellow@bsigroup.com.

Sincerely,

Ryan Stringfellow, R.G.
Site Manager

Enclosure: Table 1 – Groundwater Concentrations Estimated from Monitoring Wells, Deep Groundwater Hydraulic Control Pilot Study

cc: David Lacey, Oregon Department of Environmental Quality
Michael Bogdan, StarLink Logistics, Inc.
Joan Underwood, BSI America Professional Services, Inc.
Susan Dugas, BSI America Professional Services, Inc.
Alistair Macdonald, WSP USA Inc.

Table 1
Groundwater Concentrations Estimated from Monitoring Well Data
Deep Groundwater Hydraulic Control Pilot Study
Rhone-Poulenc Portland Site

Analyte	Deep Groundwater Hydraulic Control Pilot Study Average Concentration[(1)] (ug/L)	Deep Groundwater Hydraulic Control Pilot Study Maximum Concentration[(1)] (ug/L)
Volatile Organic Compounds		
1,1,1-Trichloroethane	<1.02	<1.02
1,1-Dichloroethane	<1.02	<1.02
1,1-Dichloroethene	1.28	3.10
1,1-Dichloropropene	<2.17	<2.17
1,2,3-Trichlorobenzene	10.6	23.7
1,2,3-Trichloropropane	<2.17	<2.17
1,2,4-Trichlorobenzene	25.0	128
1,2,4-Trimethylbenzene	518	1160
1,2-Dichlorobenzene	7989	24100
1,2-Dichloroethane	<1.02	<1.02
1,2-Dichloropropane	<1.02	<1.02
1,3,5-Trimethylbenzene	135	295
1,3-Dichlorobenzene	409	1190
1,4-Dichlorobenzene	4405	13000
2-Butanone (MEK)	<21.79	<21.79
2-Chlorotoluene	7.64	26.1
2-Hexanone	<25.36	<25.36
4-Chlorotoluene	6.77	23.1
4-Isopropyltoluene	<2.17	2.17
4-Methyl-2-pentanone	<25.36	<25.36
Acetone	282	947
Benzene	86.5	458
Bromochloromethane	<2.17	<2.17
Bromodichloromethane	<2.17	<2.17
Bromoform	<2.17	<2.17
Bromomethane	<21.79	<21.79
Carbon Disulfide	<22.14	<22.14
Chlorobenzene	7162	31600
Chloroethane	<21.79	<21.79
Chloroform	<2.17	<2.17
Chloromethane	<11.07	<11.07
cis-1,2-Dichloroethene	46.8	318
cis-1,3-Dichloropropene	<2.17	<2.17
Dibromochloromethane	<2.17	<2.17
Dibromomethane	<2.17	<2.17
Ethylbenzene	847	4400
Hexachlorobutadiene	<10.89	<10.89
Isopropylbenzene	14.6	41.5
m,p-Xylene	1074	3360
Methylene Chloride	<6.53	<6.53
n-Butylbenzene	<2.17	<2.17
n-Propylbenzene	49.2	115
Naphthalene	<5.79	<5.79
o-Xylene	706	2900
sec-Butylbenzene	<2.17	<2.17
tert-Butylbenzene	<2.17	<2.17
Tetrachloroethene	1.61	5.40
Toluene	17.2	95.8
Isobutyl Alcohol	<2614	<2614
Methyl tert-Butyl Ether (MTBE)	<50.1	25.1
trans-1,2-Dichloroethene	<1.02	<1.02
Trichloroethene	4.48	25.5
Vinyl Chloride	1.61	5.10

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Herbicides		
2,4,5-T	7.3	32.0
2,4,5-TP (Silvex)	2.7	7.00
2,4-D	279	1500
2,4-DB	6.5	18.0
Dalapon	<1.82	<1.82
Dicamba	0.2	0.64
Dichlorprop	6.8	31.0
Dinoseb	<0.469	<0.469
Bromoxynil	13.0	84
MCPA	127.1	390
MCPP	5489.3	37000
Insecticides		
2,4'-DDD	0.000379	0.00202
2,4'-DDE	0.000062	0.00037
2,4'-DDT	0.000030	0.00014
4,4'-DDD	0.000292	0.00070
4,4'-DDE	0.000196	0.00119
4,4'-DDT	0.000138	0.00086
Aldrin	0.000178	0.00085
alpha-BHC	0.003507	0.00909
alpha-Chlordane	0.000631	0.00364
beta-BHC	0.002373	0.00537
beta-Chlordane	0.002381	0.01570
cis-Nonachlor	0.000147	0.00094
delta-BHC	0.001531	0.00394
Dieldrin	0.000660	0.00253
Endosulfan I	<0.000130	<0.000130
Endosulfan II	<0.000054	<0.000054
Endosulfan Sulfate	<0.0000328	<0.0000328
Endrin	0.000124	0.000009
Endrin Aldehyde	<0.0000712	<0.0000712
Endrin Ketone	0.0001394	0.000503
gamma-BHC (Lindane)	0.00528	0.0221
Heptachlor	0.00000788	0.000028
Heptachlor Epoxide	0.0000148	0.000043
Hexachlorobenzene	0.0731	0.491
Methoxychlor	<0.000110	<0.000110
Oxychlordane	<0.0000192	<0.0000192
trans-Nonachlor	0.000641	0.00413
PCDD/PCDFs		
1,2,3,4,6,7,8-HpCDD	0.0000127	0.0000546
1,2,3,4,6,7,8-HpCDF	0.0001000	0.0006500
1,2,3,4,7,8,9-HpCDF	0.0000046	0.0000281
1,2,3,4,7,8-HxCDD	0.0000011	0.0000046
1,2,3,4,7,8-HxCDF	0.0000092	0.0000567
1,2,3,6,7,8-HxCDD	0.0000038	0.0000234
1,2,3,6,7,8-HxCDF	0.0000066	0.0000409
1,2,3,7,8,9-HxCDD	0.0000012	0.0000058
1,2,3,7,8,9-HxCDF	0.0000046	0.0000018
1,2,3,7,8-PeCDD	0.0000061	0.0000367
1,2,3,7,8-PeCDF	<0.00000792	<0.00000792
2,3,4,6,7,8-HxCDF	0.0000059	0.0000359
2,3,4,7,8-PeCDF	0.0000183	0.0001170
2,3,7,8-TCDD	0.0016094	0.0099100
2,3,7,8-TCDF	0.0000516	0.0003530

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OCDD	0.0000786	0.0004640
OCDF	0.0003033	0.0019500
Total HpCDD	0.0000217	0.0001130
Total HpCDF	0.000184	0.00120
Total HxCDD	0.0000243	0.000156
Total HxCDF	0.0002251	0.00143
Total PeCDD	0.0000705	0.000453
Total PeCDF	0.00705	0.0461
Total TCDD	0.00435	0.028
Total TCDF	0.0262	0.172
Semivolatile Organic Compounds		
2,3,4,6-Tetrachlorophenol	222	14.0
2,4,5-Trichlorophenol	559	4.20
2,4,6-Trichlorophenol	162	240
2,4-Dichlorophenol	201	510
2,4-Dimethylphenol	223	26.0
2-Chlorophenol	865	5300
2,6-Dichlorophenol	<265	320
Pentachlorophenol	<559	5.8
2-Methylnaphthalene	220	3.10
2-Methylphenol	434	1100
4-Chloro-3-Methylphenol	<220	<220
4-Nitrophenol	<562	<562
Anthracene	<220	<220
Benzo(a)anthracene	<220	<220
Benzo(a)pyrene	<220	<220
Benzo(b)fluoranthene	<220	<220
Benzo(k)Fluoranthene	<220	<220
Chrysene	<220	<220
4-Methylphenol (p-Cresol)	<259	<259
Acenaphthene	<220	<220
Benzoic Acid	<2439	<2439
bis(2-Ethylhexyl)phthalate	<220	<220
Diethylphthalate	<220	<220
Dimethylphthalate	<220	<220
Di-n-butylphthalate	<220	<220
di-n-Octyl Phthalate	<220	<220
Indeno(1,2,3-cd)pyrene	<220	<220
Dibenzofuran	<220	<220
Fluoranthene	<220	<220
Fluorene	<220	<220
Phenanthrene	<220	<220
Phenol	248	1200
Pyrene	<220	<220
Metals		
Arsenic	2.32	6.59
Cobalt	3.23	18.3
Iron	4169	11600
Lead	0.059	0.312
Manganese	4367	18700
Mercury	<0.02265	<0.02265
Aluminum	48.3	119
Antimony	0.186	0.411
Barium	236	776
Beryllium	0.205	0.017
Cadmium	0.218	0.101
Chromium	0.632	1.31

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Copper	4.189	22.3
Magnesium	28471	56000
Nickel	8.63	18.1
Selenium	0.96	1.0
Silver	<0.2042	<0.2042
Zinc	15.3	83.6
Sulfate	846	4230
PCBs		
Total Arochlors	0.00573	0.0401

(1) - Groundwater concentration includes 1/2 the detection limit value for non-detected compounds.