



15 December 2008

Mr. Matt McClincy
Oregon Department of Environmental Quality
Northwest Region
2020 Southwest Fourth Avenue
Suite 400
Portland, Oregon 97201-4987

Subject: **Project Management Plan
Source Control Measures and Upland Feasibility Study
Arkema Inc. Portland Facility**

Dear Mr. McClincy:

This Project Management Plan (PMP) has been prepared by Legacy Site Services LLC (LSS), agent for Arkema Inc., to present the proposed draft schedule for document submittals to the Oregon Department of Environmental Quality (ODEQ) regarding the Arkema, Inc. facility in Portland, Oregon (the "site"). This PMP also identifies key members of the project team and provides a brief description of their associated roles. The PMP also provides a discussion of how project variations will be managed and reported. This PMP was developed in accordance with the Order on Consent (DEQ No. LQVC-NWR-08-04) and associated Scope of Work (SOW) for Source Control Measures and Upland Feasibility Study at the site, signed and effective on 31 October 2008 (Consent Order).

PROJECT SCHEDULE

A proposed project schedule for submittal and implementation of the key documents and activities identified in the SOW is included as Figure 1 in Attachment A. As required in the Consent Order, the following tasks are included in the proposed schedule:

- PMP;
- River Bank Erodible Source Control Screening Evaluation;
- Hot Spot Evaluation Update;

- Alternatives Analysis of River Bank Source Control Measures (SCMs) (if necessary);
- Design and Implementation Work Plans for Groundwater, Stormwater, and (if necessary) River Bank SCMs;
- Feasibility Study Data Gaps Work Plan;
- Draft Feasibility Study (FS) Work Plan;
- Draft FS Report; and
- Final FS Report.

Additional submittals and activities necessary to implement the SOW are included in the project schedule. This list of tasks will be expanded in future versions of the schedule provided in upcoming deliverables (e.g., SCM Design and Implementation Work Plans) as required during the project.

PROJECT PERSONNEL

A brief description of personnel currently anticipated to be involved with the SOW is included below. This team is consistent with the personnel used by LSS to date in performance of work under the Voluntary Agreement. Therefore, in accordance with Section 8 A. (1) of the Consent Order, this team is considered approved by DEQ. Proposed changes to this team will be submitted in writing to DEQ as described in Section 8 A. (2) of the Consent Order. Subcontractors have not yet been identified at this stage of the project work.

- Todd Slater, LSS (todd.slater@total.com; 610.594.4430)
Primary point of contact for LSS, agent for Arkema
- Erik Ipsen, PE, Partner, ERM (erik.ipsen@erm.com; 503.488.5282)
Primary point of contact and overall Project Manager for ERM, consultant managing performance of the SOW on behalf of LSS
- Bill Butler, PE, Partner, ERM (bill.butler@erm.com; 610.524.3500)
Leading the groundwater treatment aspects of the SOW
- Doyon Main, PE, ERM (doyon.main@erm.com; 281.600.1000)
Leading the barrier wall engineering and construction management aspects of the SOW

- Ted Cota, PG, ERM (ted.cota@erm.com; 303.741.5050)
Leading hydrology and groundwater modeling aspects of the SOW
- David Livermore, PG, Principal, Integral Consulting, Inc. (dlivermore@integral-corp.com; 503.284.5545)
Primary point of contact and overall Project Manager for Integral, consultant managing performance of Stormwater SCM on behalf of LSS
- Larry Patterson, ERM (larry.patterson@erm.com; 503.225.7210)
Onsite contact for LSS at the Arkema Portland facility
- Kevin Deeny, PE, KC Environmental (kdeeny@comcast.net; 215.949.0524)
Senior Technical Advisor for Groundwater and Stormwater Treatment
- Karen Traeger, LSS (karen.traeger@total.com; 303.741.0426)
Legal Counsel for LSS
- Stephen Parkinson, Groff Murphy (sparkinson@GroffMurphy.com; 206.832.1484)
Legal Counsel for LSS

VARIATIONS FROM WORK PLAN

Any unexpected conditions, alternative activities, personnel, or other variations from ODEQ approved work plans will, to the greatest extent practicable, be identified and communicated to ODEQ before the respective scope of work is conducted, when possible. These conditions and variations will be communicated in the Quarterly Progress Reports to ODEQ. Work plans will be revised, as necessary, to reflect new information and submitted to ODEQ for approval. If variations from the approved work plans are encountered during the scope of work, all variations will be documented in the final report submitted to ODEQ.

If an event occurs that is beyond LSS's reasonable control and that causes or might cause a delay or deviation in performance of the requirements of the Consent Order, LSS will promptly notify DEQ's Project Manager verbally of the cause of the delay or deviation, its anticipated duration, the measures that have been or will be taken to prevent or minimize the delay or deviation, and the timetable by which LSS proposes to carry out such measures. LSS will confirm this information in writing within five (5) working days of the verbal notification.

If you have any questions or require additional information, please contact me at (610) 594-4430.

Sincerely,

Legacy Site Services LLC

A handwritten signature in black ink, appearing to read 'J. Todd Slater', with a long horizontal flourish extending to the right.

J. Todd Slater

Manager, Environmental Technologies and Remedial Procurement

Attachment

cc: Henning Larsen, ODEQ
Tom Gainer, ODEQ
Erik Ipsen, ERM
Sean Sheldrake, EPA
Karen Traeger, LSS
Steve Parkinson, Groff Murphy
Larry Patterson
David Livermore, Integral

Attachment A
Project Schedule

