



Oregon

Kate Brown, Governor

Department of Environmental Quality

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December 27, 2022

Todd Slater
Legacy Site Services LLC
Retia USA, LLC/Legacy Site Services LLC
665 Stockton Drive, Suite 100
Exton, PA 19341

Subject: Revised Feasibility Study Functional Units
Arkema Facility, ECSI No. 398

Dear Mr. Slater:

The Oregon Department of Environmental Quality received the revised *Feasibility Study Functional Units* memorandum (FU Memo) and associated response to comment letter both dated November 22, 2022. The letter and FU Memo were prepared by Environmental Resources Management (ERM) for Legacy Site Services LLC (LSS). The FU Memo presents proposed functional units that segregate areas into distinct units to facilitate screening and selection of remedial technologies and alternatives in the Feasibility Study.

The revised FU Memo addressed DEQ's comment provided in a letter dated May 19, 2022. The revised FU Memo is accepted as presented.

LSS is proposing 12 functional units (FUs), some of which include significant overlap. For example, the only differentiator between FU-3 and FU-4 and FU-8 and FU-9 is the presence of DNAPL. As the Feasibility Study (FS) preparation continues, some of the division between the FUs may prove unnecessary for organizing the FS because remedial technologies identified for many of the FUs may end up being the same technologies. DEQ recommends, LSS consider, with DEQ approval, merging some of these FUs, if warranted, to remove potential duplicity or unnecessary repetition within the FS.

Please contact me at 503-860-3943 or by email at Katie.Daugherty@deq.oregon.gov if you have any questions.

Sincerely,

Katie Daugherty, R.G.
Project Manager
Cleanup and Leaking UST Section
Northwest Region

ecc: Brendan Robinson, ERM
Josh Hancock, ERM
Sarah Seekins, ERM