From:	Andrew Gardner
To:	DAUGHERTY Katie * DEQ
Cc:	Todd SLATER; Josh Hancock; Sarah Seekins; Brendan Robinson; Morgan Farmer
Subject:	RE: Arkema Portland - January 2023 MPR
Date:	Wednesday, March 15, 2023 2:10:42 PM
Attachments:	image001.png image002.png Jan2023 Monthly Progress Report_20230315_reduced.pdf

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Katie,

The January 2023 MPR is attached. This report addresses your comments dated 28 February.

Please let us know if you have any questions or comments.

Thanks,

Andrew Gardner, EIT (OR)
Consultant II, Engineering
he/him/his

ERM
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From: DAUGHERTY Katie * DEQ <Katie.DAUGHERTY@deq.oregon.gov>
Sent: Tuesday, February 28, 2023 08:02
To: Andrew Gardner <Andrew.Gardner@erm.com>
Cc: Todd SLATER <todd.slater@totalenergies.com>; Josh Hancock <Josh.Hancock@erm.com>; Sarah Seekins <Sarah.Seekins@erm.com>; Brendan Robinson <Brendan.Robinson@erm.com>; Morgan Farmer <Morgan.Farmer@erm.com>
Subject: RE: Arkema Portland - December 2022 MPR

EXTERNAL MESSAGE

Hi Andrew,

A couple of comments on the MPR

1. **Section 2, Groundwater Source Control Implementation.** The first sentence of the fifth paragraph states "The distribution of COPCs at the site is predominantly within the Shallow Zone, with decreasing impacts observed in the Intermediate and Deep Zones." It appears that this statement was also made in previous monthly performance monitoring reports. This statement is overly broad and does not reflect the distribution of chlorinated VOCs, chloride, and perchlorate that have been the focus of groundwater sampling since 2019. DEQ

recommends removing this statement from future monthly performance monitoring reports.

2. **Table 1-2, December Vertical Gradients.** There appears to be an error in the vertical gradient calculations presented in the table. DEQ assumes that the vertical gradients presented in Figures 5 and 6 are correct. Please correct the vertical gradients presented in Table 1-2 in future monthly performance monitoring reports.

Thanks,
Katie

Katie Daugherty, R.G | she/her
Project Manager
Oregon DEQ | NWR Cleanup and Leaking UST Section
700 NE Multnomah Street, Suite 600
Portland, OR 97232
503-860-3943
Katie.Daugherty@deq.oregon.gov

From: Andrew Gardner <Andrew.Gardner@erm.com>
Sent: Wednesday, February 15, 2023 2:37 PM
To: DAUGHERTY Katie * DEQ <Katie.DAUGHERTY@deq.oregon.gov>
Cc: Todd SLATER <todd.slater@totalenergies.com>; Josh Hancock <Josh.Hancock@erm.com>; Sarah Seekins <Sarah.Seekins@erm.com>; Brendan Robinson <Brendan.Robinson@erm.com>; Morgan Farmer <Morgan.Farmer@erm.com>
Subject: Arkema Portland - December 2022 MPR

Katie,

The December 2022 MPR is attached. Please let us know if you have any questions or comments.

Thanks,

Andrew Gardner, EIT (OR)
Consultant II, Engineering
he/him/his

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