From:	Andrew Gardner
To:	DAUGHERTY Katie * DEQ; Todd SLATER
Cc:	Sarah Seekins; Josh Hancock; Brendan Robinson; Morgan Farmer; THOMAS Wesley * DEQ; LACEY David J * DEQ; Benjamin Johnson
Subject:	RE: Arkema Portland - March 2023 MPR
Date:	Friday, June 9, 2023 12:16:24 PM
Attachments:	image001.png image002.png

Hi Katie,

I have reviewed the reports with the team and the source of the error in our workflow was discovered and has since been corrected. We will be re-issuing the January – March MPRs with those edits next week following the submittal of the April MPR on 6/15.

Thank you for your patience and feedback.

Best,

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

ERM
1050 SW 6th Ave. Suite 1650 | Portland, Oregon | 97204
M (503) 858-8811
E andrew.gardner@erm.com | **W** www.erm.com

ERM *The business of sustainability*

Read our Sustainability Report and ERM Foundation Annual Review

---

From: DAUGHERTY Katie * DEQ <Katie.DAUGHERTY@deq.oregon.gov>
Sent: Monday, June 5, 2023 09:19
To: Todd SLATER <todd.slater@totalenergies.com>
Cc: Sarah Seekins <Sarah.Seekins@erm.com>; Josh Hancock <Josh.Hancock@erm.com>; Brendan Robinson <Brendan.Robinson@erm.com>; Morgan Farmer <Morgan.Farmer@erm.com>; THOMAS Wesley * DEQ <Wesley.THOMAS@deq.oregon.gov>; LACEY David J * DEQ <David.J.LACEY@deq.oregon.gov>; Benjamin Johnson <bjohnson@gsiws.com>; Andrew Gardner <Andrew.Gardner@erm.com>
Subject: RE: Arkema Portland - March 2023 MPR
Importance: High

EXTERNAL MESSAGE

Hello Todd,

There continues to be issues related to the vertical gradient calculations in Table 1-2 in the

MPRs. They are still incorrect. This has now resulted in the figures being incorrect which then means the conclusions related to vertical gradients in the text of the report are based on incorrect values.

DEQ has made the request prior for these to be corrected. Do we need to meet to discuss this to make sure everyone is on the same page on what needs to be fixed?

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, May 17, 2023 10:49 AM
To: DAUGHERTY Katie * DEQ <Katie.DAUGHERTY@deq.oregon.gov>
Cc: Todd SLATER <todd.slater@totalenergies.com>; Sarah Seekins <Sarah.Seekins@erm.com>; Josh Hancock <Josh.Hancock@erm.com>; Brendan Robinson <Brendan.Robinson@erm.com>; Morgan Farmer <Morgan.Farmer@erm.com>
Subject: RE: Arkema Portland - March 2023 MPR

Hi Katie,

The March 2023 MPR is attached. Please let me know if you have any questions.

Thanks,

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

ERM
1050 SW 6th Ave. Suite 1650 | Portland, Oregon | 97204
M (503) 858-8811
E andrew.gardner@erm.com | **W** www.erm.com

ERM *The business of sustainability*

Read our Sustainability Report and ERM Foundation Annual Review

From: Andrew Gardner <Andrew.Gardner@erm.com>
Sent: Friday, April 14, 2023 13:47
To: DAUGHERTY Katie * DEQ <Katie.DAUGHERTY@deq.oregon.gov>
Cc: Todd SLATER <todd.slater@totalenergies.com>; Sarah Seekins <Sarah.Seekins@erm.com>; Josh Hancock <Josh.Hancock@erm.com>; Brendan Robinson <Brendan.Robinson@erm.com>; Morgan Farmer <Morgan.Farmer@erm.com>
Subject: RE: Arkema Portland - February 2023 MPR

Hi Katie,

The February 2023 MPR is attached. Please let me know if you have any questions.

Additionally, the January 2023 MPR was submitted with an incorrect heading on table 1-2. A revised version is attached showing the correct header. These number match the figures.

Thanks,

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

ERM
1050 SW 6th Ave. Suite 1650 | Portland, Oregon | 97204
M (503) 858-8811
E andrew.gardner@erm.com | **W** www.erm.com

ERM *The business of sustainability*

Read our Sustainability Report and ERM Foundation Annual Review

---

From: DAUGHERTY Katie * DEQ <Katie.DAUGHERTY@deq.oregon.gov>
Sent: Monday, March 27, 2023 07:58
To: Josh Hancock <Josh.Hancock@erm.com>; Andrew Gardner <Andrew.Gardner@erm.com>
Cc: Todd SLATER <todd.slater@totalenergies.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 & January 2023

EXTERNAL MESSAGE

Hi Josh, It does not look like these comments were addressed in the January MPR. It would be nice to at least get the vertical gradients corrected in the table. Thanks, Katie

---

From: Josh Hancock <Josh.Hancock@erm.com>
Sent: Friday, March 3, 2023 4:17 PM
To: DAUGHERTY Katie * DEQ <Katie.DAUGHERTY@deq.oregon.gov>; Andrew Gardner <Andrew.Gardner@erm.com>

Cc: Todd SLATER <todd.slater@totalenergies.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

Thank you for these comments Katie. We will make sure they are addressed in the January 2023 MPR and reports going forward.

Josh

From: DAUGHERTY Katie * DEQ <Katie.DAUGHERTY@deq.oregon.gov>
Sent: Tuesday, February 28, 2023 8:02 AM
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

ERM
1050 SW 6th Ave. Suite 1650 | Portland, Oregon | 97204
M (503) 858-8811
E andrew.gardner@erm.com | **W** www.erm.com

ERM *The business of sustainability*

Read our Sustainability Report and ERM Foundation Annual Review

---

This message contains information which may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately at (303) 741-5050 and take the steps necessary to delete the message completely from your computer system. Thank you.

Please visit ERM's web site: http://www.erm.com. To find out how ERM manages personal data, please review our Privacy Policy

---

This message contains information which may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately at (303) 741-5050 and take the steps necessary to delete the message completely from your computer system. Thank you.

Please visit ERM's web site: http://www.erm.com. To find out how ERM manages personal data, please review our Privacy Policy

---

This message contains information which may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately at (303) 741-5050 and take the steps necessary to delete the message completely from your computer system. Thank you.

Please visit ERM's web site: http://www.erm.com. To find out how ERM manages personal data, please review our Privacy Policy

---

This message contains information which may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately at (303) 741-5050 and take the steps necessary to delete the message completely from your computer system. Thank you.

Please visit ERM's web site: http://www.erm.com. To find out how ERM manages personal data, please review our Privacy Policy