From:	DAUGHERTY Katie * DEQ
To:	Andrew Gardner
Cc:	Todd SLATER; Josh Hancock; Sarah Seekins; Brendan Robinson; Morgan Farmer
Subject:	RE: Arkema Portland - December 2022 MPR
Date:	Tuesday, February 28, 2023 8:02:00 AM
Attachments:	image002.png image003.png

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