From:	Benjamin Johnson
To:	DAUGHERTY Katie * DEQ
Subject:	RE: Arkema Portland - March 2023 MPR
Date:	Tuesday, May 30, 2023 4:31:44 PM
Attachments:	image001.png image002.png

Hi Katie –

I do not have any comments on the MPR. It does seem like they have addressed Wes' comments on the December 2022 MPR. At least the first comment was resolved in the January 2023 MPR, but I only checked the vertical gradient presentation in the March 2023 MPR. Anything else needed from me on this one?

I assume the FS Technology Screening and FS Outline comments from Wes are sufficient but if you want me to dig in too I can. I do plan to review the GWET SEE in the next couple days and provide comments prior to June 19.

Thanks –

Benjamin Johnson, RG, LHG
Supervising Hydrogeologist
direct: 971.200.8520 | mobile: 503.679.4543
650 NE Holladay Street, Suite 900, Portland, OR 97232
GSI Water Solutions, Inc. | www.gsiws.com

GSI has moved! Please note our new address above.

Privileged and Confidential Communication/Attorney Work Product/Joint Defense Communication

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From: DAUGHERTY Katie * DEQ (Katie.DAUGHERTY@deq.oregon.gov) <Katie.DAUGHERTY@deq.oregon.gov>
Sent: Monday, May 22, 2023 8:32 AM
To: Benjamin Johnson <bjohnson@gsiws.com>; THOMAS Wesley * DEQ <Wesley.THOMAS@deq.oregon.gov>; LACEY David J * DEQ <David.J.LACEY@deq.oregon.gov>
Subject: FW: Arkema Portland - March 2023 MPR

FYI – let me know if you have any comments (or if they still have not fixed what Wes has requested)

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

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M (503) 858-8811
E andrew.gardner@erm.com | **W** www.erm.com

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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

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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

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