



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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May 3, 2024

Todd Slater
Legacy Site Services LLC
3553 West Chester Pike #413
Newton Square, PA 19073

via electronic delivery (email)

Subject: Arkema Quarter 4, 2023 Groundwater Monitoring Report
Arkema Facility, ECSI No. 398

Dear Mr. Slater:

The Oregon Department of Environmental Quality received the *Arkema Quarter 4, 2023 Groundwater Monitoring Report* dated March 2024. Environmental Resources Management prepared the report for Retia USA LLC. DEQ has the following comment.

General Comments:

1. DEQ requests that purge equipment, well total depths and screen intervals be added to groundwater sampling field data forms. For the latter two, it is important to see if depth to water is falling below the screen.

Specific Comments:

1. **Section 2.1, Groundwater Level Measurements.** For water levels that were collected from wells with transducers, it should be noted whether drift was observed and corrected for.
2. **Section 3.2.1, Field Parameter Results.** Wells that were sampled without parameter stability or have unstable drawdowns should be considered deviations and identified as such. This includes, but may not be limited to, the following.
 - a. PA-16I, PA-31, PA-24D, and PA-30D had unstable turbidity
 - b. PA-17D, PA-17IR, PA-23D, and PA-25D had over a foot of drawdown

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
NWR Cleanup Program

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