



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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July 5, 2024

*via email delivery*

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

Subject: *In Situ Stabilization Pre-Design Investigation Work Plan*  
Arkema Facility, ECSI No. 398

Dear Mr. Slater:

The Oregon Department of Environmental Quality received and reviewed the July 2, 2024 *In Situ Stabilization Pre-Design Investigation Work Plan* (ISS PDI WP), prepared by Environmental Resources Management, Inc. for Legacy Site Services LLC. The ISS PDI WP documents proposed actions to design and support the implementation of an interim remedial action measure to address the monochlorobenzene source area originating from the former acid plant area using ISS and/or in situ chemical oxidation technologies. The ISS PDI WP is approved as presented.

Please contact me at 503-860-3943 or by email at [Katie.Daugherty@deq.oregon.gov](mailto:Katie.Daugherty@deq.oregon.gov) if you have any questions.

Sincerely,

*Katie DAUGHERTY*

Katie Daugherty, R.G.  
Project Manager  
Cleanup Program  
Northwest Region

Enclosure (EPA Comments)

ecc David Lacey, DEQ  
Wes Thomas, DEQ  
Laura Hanna, EPA  
Brendan Robinson, ERM  
Josh Hancock, ERM  
Sarah Seekins, ERM