



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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October 1, 2024

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

via electronic delivery (email)

Subject: Off-Site COCs  
Arkema Facility, ECSI No. 398

Dear Mr. Slater:

The Oregon Department of Environmental Quality received the *Trespass Contamination Determination* (Trespass) memorandum dated February 14, 2024. Environmental Resources Management prepared the report for Legacy Site Services LLC (LSS).

DEQ has requested LSS present an evaluation to support DEQ's review of the Draft Feasibility Study and to inform which contaminant plumes should be addressed by LSS under an interim remedial action measure (IRAM) or future site wide record of decision (ROD). The assessment is based on the current data set which for some plumes is limited and complicated by potential overlapping sources or background (both naturally occurring and anthropogenic).

In reviewing the Trespass memo DEQ agrees with some of the conclusions, however, for several plumes there is too much uncertainty for DEQ to concur with the memo's conclusions at this time.

### Contaminate Groundwater Plumes Associated With Off-Site Sources

DEQ agrees the following COCs are likely associated with off-site sources in the location and groundwater zone specified and do not need to be addressed by LSS in future IRAMs or in the next site wide Feasibility Study at this time.

Location	COCs		Groundwater Zone(s)
Lot 1, Lot 2, and Lot 3	Benzene Silvex	2,3,7,8-TCDD TEQ	Shallow adjacent to North Front Ave
Lot 1 and Lot 2	Benzene Chlorobenzene 1,2-dichlorobenzene 1,3-dichlorobenzene 1,4-dichlorobenzene Dieldrin	DDx Hexachlorobenzene Silvex Trichloroethylene (TCE) Vinyl chloride	Intermediate, Deep, and Gravel/basalt

If a specific COC/location/groundwater zone is not listed in the table above then there is either a lack of sufficient data to make a determination or supporting information was either not presented or not sufficient. DEQ expects that future data collections and IRAMs implemented by LSS and other

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responsible parties will provide significant insight on which additional plumes will need to be addressed by LSS or by other responsible parties.

Pease 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,

A handwritten signature in black ink that reads "Katie DAUGHERTY". The signature is written in a cursive style, with the first name "Katie" in a more fluid script and the last name "DAUGHERTY" in all caps with a slightly more formal, though still cursive, touch.

Katie Daugherty, R.G.  
Project Manager  
NWR Cleanup Program

ecc     Brendan Robinson, ERM  
         Josh Hancock, ERM  
         Avery Soplata, ERM