



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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July 1, 2025

*via email delivery*

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

Subject: *Contaminated Material Management Plan for In Situ Stabilization*  
Arkema Facility, ECSI No. 398

Dear Todd Slater:

The Oregon Department of Environmental Quality received and reviewed the May 2025 *Contaminated Material Management Plan for In Situ Stabilization* (CMMP), prepared by Environmental Resources Management, Inc. for Legacy Site Services LLC. The CMMP describes the procedures for management and handling of soil and other materials during the implementation of an interim remedial action measure to address the monochlorobenzene source area originating from the former acid plant area (IRAM 1).

DEQ has the following comments on the CMMP.

- 1) The footprint of IRAM 1 overlaps with one or more human health direct contact hot spot areas (e.g. 2,4 and 4,4 DDT). DEQ does not approve the stockpiling and reuse of soil that exceeds hot spot thresholds. These soils should either 1) remain in the excavation and be treated with ISS, or 2) be disposed of off-site.
- 2) The field screening approach is unlikely to reliably identify hot spot exceedances. Stockpiled materials must be characterized, including analytical sampling, prior to reuse.
- 3) Soils with concentrations less than the hot spot thresholds could be reused as backfill, provided that the contaminated soil is capped with demarcation layer separating the re-used material and the overlying cap consisting of 1 foot of densely graded aggregate.

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  
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ecc     Brendan Robinson, ERM