



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

September 10, 2025

*via email delivery*

Thierry Razat  
Legacy Site Services, LLC  
1201 Louisiana St., Suite 1800  
Houston, TX 77002

Subject: *IRAM 1 Performance Monitoring Well Network Installation Work Plan*  
Arkema Facility, ECSI No. 398

Dear Thierry Razat;

The Oregon Department of Environmental Quality received and reviewed the August 22, 2025 *IRAM 1 Performance Monitoring Well Network Installation Work Plan* (Work Plan), prepared by Environmental Resources Management, Inc. for Legacy Site Services LLC. The Work Plan presents the monitoring well network proposed to evaluate the performance of an interim remedial action measure addressing the monochlorobenzene source area originating from the former acid plant area.

DEQ has the following comments on the Work Plan.

1. Section 1.1 states “The primary objective of the PMWP is to establish a monitoring well network that will be used to evaluate the effect of IRAM 1 on MCB [monochlorobenzene] concentrations in groundwater near the IITA [IRAM 1 Treatment Area].” However, many of the wells shown in Figure 3 are too distant from IRAM 1 Treatment Area to contribute to meeting this specific objective. Presumably each well cluster location was selected deliberately, and DEQ requests the specific monitoring objectives and justification for their locations be provided for all wells.
2. Monitoring with well cluster locations on the northwestern side of the NAPL plume and ISS area appears very limited. Consider adding additional cluster sets in this area (as suggested in the enclosed annotated figure) and moving the PW-10 cluster northward where the NAPL appears to expand in a northwesterly direction.
3. The cross-section Figures 5 through 7 should include the extent of the proposed ISS so that this can be seen in relation to the proposed locations of the PMW cluster monitoring wells.

