

Department of Environmental Quality Northwest Region

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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 I1TA [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.

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Please contact me at 503-860-3943 or by email at <u>Katie.Daugherty@deq.oregon.gov</u> if you have any questions.

Sincerely,

Katis DAUGH PTG

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

ecc Laura Hanna, EPA Brendan Robinson, ERM

Annotated Figure 3 PMW-13s PMW-13i PMW-13d PMW-13b PMW-05s PMW-05i PMW-05d PMW-16d PMW-06s RW-3 PMW-16b PMW-06d PMW-06b RW-11i is part of PMW-06 Cluster PMW-07s PMW-07i PMW-07d PMW-07b Move PMW-10 Cluster here **MWA-42** MWA-541 PMW-08d PMW-10s PMW-08bil PMW-10i dd 2 more **PMW clusters** PMW-09s PMW-09d PMW-09b PMW-01s PMW-01i PMW-01d

PMW-01b