



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

January 12, 2026

via email delivery

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

Subject: IRAM 1 – *Acid Plant Area Shallow Soil SAP*
Arkema Facility, ECSI No. 398

Dear Thierry Razat;

The Oregon Department of Environmental Quality received and reviewed the December 4, 2025 *Acid Plant Area Shallow Soil Sampling and Analysis Plan (SAP)*, prepared by Environmental Resources Management, Inc. (ERM) for Legacy Site Services LLC (LSS). DEQ also received and reviewed proposed changes to the SAP provided by ERM in an email to DEQ dated December 18, 2025. The SAP presents means and methods to characterize shallow soil to support soil management during the implementation of an interim remedial action measure (IRAM) addressing the monochlorobenzene source area originating from the former acid plant area.

DEQ has the following comments.

1. DEQ acknowledges the sampling field work is complete and was performed “at risk” by ERM/LSS to maintain the IRAM schedule.
2. DEQ agrees the SAP is sufficient for soil management decision making purposes.
3. While not a stated purpose, DEQ is not approving the SAP for purposes of determining the extent of direct contact hot spots or determining if the removal will address the direct contact hot spots (IRAM 3).

Please provide a revised SAP incorporating changes detailed in the December 18, 2025 email to DEQ. Please contact me at 503-860-3943 or by email at Katie.Daugherty@deq.oregon.gov if you have any questions.

Sincerely,

Katie DAUGHERTY

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

ecc Brendan Robinson, ERM