



# Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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January 23, 2026

*via email delivery*

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

Subject: IRAM 1 – *Contaminated Material Management Plan of In Situ Stabilization*  
Arkema Facility, ECSI No. 398

Dear Thierry Razat;

The Oregon Department of Environmental Quality received and reviewed the December 19, 2025 *Contaminated Material Management Plan of In Situ Stabilization* (CMMP), prepared by Environmental Resources Management, Inc. (ERM) for Legacy Site Services LLC (LSS). The CMMP presents proposed methods for soil and other potential materials to be 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 approves the area of contamination (AOC) defined as the entirety of Lots 1, 2, 3, and 4 for the purpose of in-situ treatment or soil consolidation during remediation. The AOC does not include the riverbank area (Tract A) or any in-water area. LLS remains responsible for ensuring all actions are in compliance with the Resource Conservation and Recovery Act, as applicable.
2. Soil Management Areas (SMAs) 1 and 2 are required to have a demarcation layer be placed between the current ground surface and soil consolidated in the areas during remediation. DEQ acknowledges the design of the SMAs are likely in the forthcoming remedial design report and the CMMP may not be the appropriate location for these construction details.

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

ecc Brendan Robinson, ERM