



REGION 10

SEATTLE, WA 98101

August 13, 2026

MEMORANDUM

SUBJECT: Comments on Phase 1 Data Gaps Investigation Work Plan
Arkema Inc. Facility, Portland, Oregon
ECSI # 389

FROM: Laura Hanna, Remedial Project Manager 
Superfund and Emergency Management Division, EPA

TO: Katie Daugherty, Project Manager
NWR Cleanup, Oregon Department of Environmental Quality

The following are the U.S. Environmental Protection Agency's (EPA's) comments on the document titled *Phase 1 Data Gaps Investigation Work Plan* (Phase 1 Data Gaps WP). The Phase 1 Data Gaps WP was prepared by Environmental Resources Management, Inc (ERM) for the Arkema Inc. Facility (Arkema). The Arkema site is located at 6400 NW Front Ave in Portland, Oregon and listed as Environmental Cleanup Site Information (ECSI) #389. The site is located along the Willamette River upland of the River Mile Seven West A (RM7Wa) remedial design project area within the Portland Harbor Superfund Site (PHSS). The Phase 1 Data Gaps WP focuses on the groundwater upland source contaminant transport pathway

EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective; and "Matters of Style," which substantially or adversely affect the presentation of the technical information provided in the report.

Primary Comments

1. **General:** Provide additional detail on the data collection objectives, performance metrics, and decision criteria that will be used to evaluate site conditions and Interim Remedial Action Measure (IRAM) effectiveness, and explain how the proposed monitoring network, sampling parameters, and data collection activities will support long-term performance monitoring and future remedy decisions. The Phase 1 Data Gaps WP presents a general framework for phased data collection and Section 4 states the results will be used to inform decision-making regarding IRAMs 2 and 4. However, the document does not clearly define the objectives or decision-making process that will guide future evaluation of site conditions and IRAM performance. These details

should be included in this document or in a subsequent work plan that is developed and approved before monitoring activities begin. Without a clear framework linking monitoring activities to project objectives and decision-making needs, there is a risk that the resulting data will not adequately support key management and regulatory decisions, potentially affecting the in-water remedy schedule.

2. **Section 3.2 Well Drilling:** Expand on the statement in Section 3.2 that “No plugs/seals will be installed between the aquifer zones during drilling except the Deep Zone and Basalt Zone contact.” Include clarification on how drilling and well installation teams will avoid cross-contamination between the zones during drilling.
3. **Section 3.6 Groundwater Sampling and Table 3:** Section 3.6 and Table 3 provide details on the analytical sampling plan for the newly installed wells, but do not provide any details on continued monitoring of these wells. It would be helpful to understand if these wells will be monitored regularly through the rest of the investigation and implementation of the IRAMs. Provide details in the text on regular monitoring or reference an upcoming document that will provide a monitoring well sampling schedule through the end of the conceptual timeline in this work plan.
4. **Figure 2 IRAMs and Data Gaps Investigations Conceptual Timeline:** EPA has the following comments on this figure:
 - a. Figure 2 presents a conceptual timeline for IRAMs 1 through 4, including multiple data gaps phases that have implications for 3 of the 4 IRAMs extending into 2030. EPA is concerned with the length of this timeline. A more detailed schedule should be provided to consider activities/phases that could be adjusted for time efficiency, and steps should be taken to ensure that quality and efficiency are priorities in completing this timeline. For example, Arkema should consider if the Data Gaps Phase 1 Drilling could occur at the same time as the IRAM 1 monitoring well installation activity.
 - b. Figure 2 presents pilot studies for IRAMs 2 and 4, but little detail is provided in the text of the work plan for these pilot studies. A section on pilot studies should be included in the text under Section 3, “Scope of Work,” to discuss what these pilot studies will include. Alternatively, include a note in the text explaining that these details will be provided in separate, identified, documents, if that is the case.

Matters of Style

1. **Figure 5 through 10:** The symbols for existing monitoring wells and existing recovery wells in Figures 5 through 10 are difficult to distinguish between. Consider adjusting the symbols for readability.

cc: David Lacey, DEQ
Katie Young, CDM Smith