



REGION 7

LENEXA, KS 66219

Mr. David Umezaki
EKI Environment & Water, Inc.
2001 Junipero Serra Boulevard, Suite 300
Daly City, California 94014

Dear Mr. Umezaki:

EKI Environment and Water, Inc. on behalf of the Chemplex Parties submitted “2024 Plume Control Investigation Work Plan” on February 14, 2024, to the Environmental Protection Agency and Iowa Department of Natural Resources for the Chemplex Site in Clinton, Iowa as partial fulfillment of requirements contained in Consent Decree No. 3-91-CV-10096 (CD). The agencies provide the following comments.

1. Section 2, pp. 1 and 2. Revise the site conceptual model to address or the clarify the following:
 - a. The statement “... DNAPL migrating vertically during the early stage of the release would have been impeded upon reaching the Picture Rock layer ...” appears contradictory to the description of the original remedial action, which addressed the Farmers Creek layer, beneath the Picture Rock layer: “The groundwater extraction effort focused on the Upper Scotch Grove and Farmers Creek layers. PCE concentrations in groundwater in these layers may indicate residual DNAPL.”
 - b. The statement “... extraction could lead to further downward vertical migration of residual DNAPL by disturbing meta-stable DNAPL that could have pooled ...” appears contradictory to other statements indicating residual PCE is present in rock pores and “will back-diffuse out at a slow rate over a long time.”
2. Section 4, pp. 4 and 5. The following comments apply to the proposed investigation approach in general.
 - a. While the degree of resolution in data collection is appreciated, the overall scope of the proposed activities is limited to three small areas relative to the plume extent, and two of those investigation efforts appear to result in single, 2-inch monitoring wells with 10-foot screens. While it is recognized that data collected will support improved injection activities to address accessible regions of high mass in areas of high transport, it is unclear that injection in these limited areas would adequately address the full thickness

or extent of the migrating contamination plume or continue to do so over time. To the extent practicable, EPA's preference is to address the source of the contamination so that it does not have the opportunity to migrate away from the site into a complex hydrogeologic environment with downgradient receptors. The work plan/report resulting from these efforts should address these concerns and expectations.

- b. No specific procedures are presented for the drilling, investigation, construction, sampling, data management, or other activities generally presented in Section 4. Revise the work plan to present these details. To the extent the activities in this work plan will follow procedures detailed in other planning documents (e.g., SOPs, QAPPs, data management plans, manufacturer instructions), these documents should be clearly identified. The supplemental planning documents should be made available if not previously provided, and the field teams should have copies of all relevant documents for fieldwork preparation and general reference. The work plan/report resulting from these efforts should clearly identify any deviations from these planning documents and discuss the acceptability of limitation to the investigative approaches applied (for example, the absence of redox data when using SnapSamplers, the elevated detection limits of membrane interface probes).
3. Section 4.2, p. 5. The third paragraph of Section 4.2 notes that a traditional direct-push boring will be installed to verify MIP/HPT instrumentation findings. Revise the work plan to specify the sampling and analytical methods that will be employed to verify the chemical and physical MIP/HPT outputs.
4. Sections 5 and 6, p. 6. Revise the work plan to clarify the schedule for the Injection Work Plan following completion of field activities. Based on Section 1, this plan appears to be included with the report noted in Section 6, which is to be submitted within 45 days of completion of field activities. Please explain how the schedule would change if the data from either the East Trib or the West Trib area are delayed.
5. Section 7, p. 6. Revise the work plan to correct the date of the first reference from 2020 to 2023.

Please provide a response to the above comments by April 15, 2024. If you have questions or wish to discuss the project, please contact me at (913) 551-7130, or at price.laura@epa.gov.

Sincerely,

Laura Price
Remedial Project Manager
Federal Facilities and Post Closure Section
Superfund and Emergency Management Division

cc: Michael Alowitz (GHD)
Matthew Graesch (IDNR)