



## REGION 7

LENEXA, KS 66219

Mr. Michael Alowitz  
GHD  
11228 Aurora Avenue  
Des Moines, Iowa 50322-7904

Dear Mr. Alowitz:

GHD, on behalf of the Chemplex Parties, submitted a revised "Well 3 Plume Control Investigation Report and Injection Plan" and a "Response to Comments" letter on December 5, 2024, to the Environmental Protection Agency and the 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.

### General

1. The agencies request that the consult with TerraTherm be provided to the agencies for review. This will assist the agencies with a better understanding of the challenges of using thermal at the site.

### Specific

1. Section 2.1 (p. 1). Accept response.
2. Section 2.2 (p. 2). Accept response.
3. Section 2.2 (p. 2). The reference to Appendix A (blue triangles representing HPT checks) was removed during revision, and no statement about the acceptability of the calibration verification and data quality was provided.
4. Sections 3.2 and 3.3 (p. 3). Accept Response. The clarification provided in this response would be helpful to the reader's understanding and should be similarly conveyed within future reporting associated with this effort.
5. Section 4.1 (p. 3). Section 4.1. PCE concentrations at SW-1.5 (gaining) exceeded half the cleanup level prior to previous treatment in the Well 3 area, and concentrations appear to be rising back to similar levels. Historically, surface water concentrations at the former tile drain further upstream have been higher than at SW-1.5. While coupled groundwater and surface water data help demonstrate the pathway near Well 3, groundwater entry points are less clear along other tributary reaches or known gaining reaches are not represented by sampling. Current surface water sampling locations represent a mix of gaining and losing stream segments (where mapped), temporal

changes are not well established, and surface water sampling locations downgradient of the railroad have not been mapped for gaining or losing properties. Continued work is needed to improve understanding of groundwater-surface water interaction, and as appropriate based on this understanding, addition, or revision of surface water sampling locations for purposes of understanding both contaminant transport and exposure potential.

6. Section 4.5 (p. 5). Accept responses.
7. Section 4.7 (p. 5). Section 4.7. Accept responses. Please revise the Performance Monitoring Evaluation Plan and Quality Assurance Project Plan to include this work.
8. Section 4.7, second paragraph. Accept response. Please revise the Performance Monitoring Evaluation Plan and Quality Assurance Project Plan to include this work.
9. Section 6.0. Accept response.
10. Figure 4. No changes are noted on Figures 4 or 7. Please revise.
11. Additional changes. The well development form was removed from SOP#2. If this form will no longer be used, please provide an alternate.

Please provide a revised work plan/report and a response to comments by January 27, 2025. If you have questions or wish to discuss the project, please contact me at 913-551-7130, or at [price.laura@epa.gov](mailto:price.laura@epa.gov).

Sincerely,

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

cc: Dave Umezaki (EKI Environment & Water, Inc.)  
Matthew Graesch (IDNR)