

Our reference: 11223646-LTR-35

March 24, 2025

Ms. Laura Price
ACC/GCC (Chevron & Citi)
Remedial Project Manager / Superfund Redevelopment Initiative Coordinator
United States Environmental Protection Agency, Region 7
Superfund Division
11201 Renner Boulevard
Lenexa, Kansas 66219

Response to March 7, 2025, Comments
Well 3 Plume Control Investigation Report and Injection Plan
Chemplex Site, Clinton, IA

Dear Ms. Price:

This letter was prepared in response to the United States Environmental Protection Agency's (USEPA's) comments provided in a letter signed March 7, 2025, from Ms. Laura Price. Those comments followed up on previous responses provided by the Chemplex Parties in a January 28, 2025, letter. The original USEPA comments were provided from Ms. Susan Fisher in a letter dated October 17, 2024. The original comments were related to the September 5, 2024, document: Well 3 Plume Control Investigation Report and Injection Plan. An updated report was previously provided, dated January 27, 2025. An updated document (Report) accompanies this letter with changes noted below. USEPA comments are repeated in bold italics for reference preceding the Chemplex Parties' response.

1. Response to Comments

Comment 3 (October 17, 2024)

Section 2.2 (p. 2). The second paragraph of Section 2.2 states: "Both the MIP and HPT portions of the MiHPT sensor were calibrated in the field at the beginning of each workday, along with one or two midway HPT checks." Except for blue triangles in Appendix A denoting HPT checks, no documentation or discussion of response check results, calibration verification results, acceptability of data quality, or corrective measures (if needed) is included in the text or appendices. Revise to include these.

Chemplex Parties Response (December 5, 2024):

The referenced paragraph has been revised to address this comment.

USEPA comment (December 23, 2024)

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.

Chemplex Parties Response (January 28, 2025):

Text noting the blue triangle represent the HPT checks has been added to Section 2.2. As the MIP and HPT work is qualitative rather than quantitative, observing a differentiated response for the MIP or the HPT pressure sensor responds appropriately is considered sufficient to continue data collection.

USEPA comment (March 7, 2025)

The EPA is requesting documentation that the probe calibration and verification procedures were implemented as indicated in Section 4.2.2 of the work plan, which indicates the MIP/HPT data will be used as qualitative data (GHD, April 12, 2024). Appending relevant field logs would be an acceptable response. The EPA is also requesting to know whether probe calibration and verification identified unacceptable responses. A statement in the text would be an acceptable response. If these procedures were not followed, this needs to be acknowledged as a deviation from the workplan.

Chemplex Parties Response:

No documentation of the response tests are produced at the time of completion as it is not a calibration and instead a verification of appropriate systems operation. Text has been added to section 2.2 of the report indicating that all tests returned an acceptable response.

USEPA Comment (October 17, 2024)

Section 4.1 (p. 3). Section 4.1 states: “Both losing and gaining reaches of the West Trib were identified during the original remedial investigation in 1991, indicating there is hydraulic communication between this stream’s surface flow and groundwater.” Additional investigation of current West Trib conditions is requested, including a more detailed assessment of locations that groundwater discharges to surface water and surface water discharges to groundwater. This information would support understanding of contaminant transport, remedial amendment distribution, and exposure potential. A variety of tools are currently available to conduct such an investigation cost effectively.

Chemplex Parties Response (December 5, 2024):

Routinely collected monitoring data for the West and East tributaries and Rock Creek continue to indicate concentrations of site compounds of concern are significantly below ecological standards. No work to assess groundwater-surface water interaction is planned at this time. An evaluation of the West and East Tributaries was included in the August 1992 First Operable Unit Remedial Investigation Report and identified both losing and gaining reaches in the West Tributary. Figure 100 from the 1992 report is provided for reference.

USEPA comment (December 23, 2024)

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.

Chemplex Parties Response:

The Chemplex Parties believe further investigation of the surface water – groundwater interaction is not warranted by the data. Additional surface water samples could be collected; however, the current results remain significantly below the ecological standards established for evaluating the West and East Tributaries.

USEPA Comment (March 7, 2025)

While this response is accepted for the time being, it should be noted that there are now more rigorous, less expensive screening technologies and approaches to assess groundwater-surface water interaction (e.g., thermal imaging, mini-piezometers, seepage meters, indicator parameters) than those used in support of the remedial investigation. An improved conceptual understanding of groundwater-surface water pathways would better inform efforts to address downgradient contamination migration and prevent impacts to human health and the environment. Considering the costs of new wells and injection work, characterizing groundwater-surface water interactions could provide a substantial amount of useful information at relatively low cost.

Chemplex Parties Response:

USEPA's guidance is noted and appreciated.

2. Closing

Please feel free to call me at 515-414-3934 or Dave Umezaki of EKI Environment & Water, Inc. at 650-292-9079 if you have questions.

Regards,



Michael Alowitz
Senior Engineer

+1 515 414-3934
michael.alowitz@ghd.com

BW/Is/LTR-35

Encl.

Copy to: Matthew Graesch (IDNR)
Dave Umezaki (EKI Environment and Water)