

2 February 2026

Laura Price
Remedial Project Manager
U.S. Environmental Protection Agency, Region 7 SUPR/IANE
11201 Renner Boulevard
Lenexa, Kansas 66219

Subject: Chemplex Site, Clinton, Iowa--First and Second Operable Units
Annual Report for Reporting Period 1 January 2025 through 31 December 2025
(EKI 890052.32)

Dear Ms. Price:

This Annual Report is submitted to the United States Environmental Protection Agency, Region 7 (EPA) to summarize recent and upcoming activities concerning groundwater at the Chemplex Site in Clinton, Iowa as called for by the First Operable Unit (OU-1) Consent Decree. This report also summarizes remaining activities required by the Second Operable Unit (OU-2) Consent Decree. EKI Environment & Water, Inc. (EKI) has prepared this report on behalf of the Chemplex Parties.

Site maintenance was conducted by GHD Services Inc. (GHD) and its subcontractors.

MONITORING OF IN-SITU GROUNDWATER

Gauging of Groundwater Levels

In accordance with the 2015 Performance Monitoring Evaluation Plan (PME Plan) and as discussed with EPA, two water level gauging events were performed during 2025, one during the Second Quarter on 5 May 2025 and one during the Fourth Quarter on 27 October 2025. Contour maps showing potentiometric surface and an evaluation of groundwater flow patterns during these gauging events are presented in the groundwater sampling and gauging reports.

Sampling of In-Situ Groundwater

The Chemplex Parties collected the following rounds of groundwater and surface water samples during 2025:

- A First Quarter event during 25 February 2025, as presented in a report dated 2 July 2025;
- A Second Quarter event during the weeks of 21 April 2025 and 5 May 2025, as presented in a report dated 29 October 2025;

- A Third Quarter event during 11 August 2025, as presented in a report dated 9 December 2025; and
- A Fourth Quarter event during the weeks of 13 and 27 October 2025.

The results of the Fourth Quarter 2025 event will be presented in a report to be submitted during the First Quarter of 2026. Sampling work was performed in accordance with the EPA-approved PME Plan and the *Addendum to the Performance Monitoring Evaluation Plan for 2025*, dated 5 February 2025. Table 1 lists the wells designated for sampling, as well as deviations from the sampling program following its initial submittal.

The proposed well list for sampling in 2026 will be transmitted to EPA during the First Quarter of 2026.

CONTINGENCY MEASURES

In accordance with the Contingency Plan, contingency measures have been implemented in some areas downgradient of the Chemplex Site. 2025 actions associated with contingency measures included the following:

- The Chemplex Parties have continued to sample private wells at the Bark residences located at 3305 9th Street and 3311 9th Street and have continued to attempt to contact other landowners with private wells to request access for sampling of their well water;
- The Chemplex Parties collected surface water samples at locations SW-7 and SW-8 during the Second and Fourth Quarter 2025 sampling events; and
- The Chemplex Parties collected surface water samples at the Dupont surface water body and Willow Lake (locations SW-9 and SW-10) during the Second and Fourth Quarter 2025 sampling events.

Pending contingency actions include:

- The installation of the MW-149 well cluster, which has been delayed pending property access, and is planned to be relocated and constructed during 2026;
- Sampling of additional private wells, which is dependent on provision of access by the landowners.

SITE CONCEPTUAL MODEL AND HOT-SPOT INJECTION

As part of the ongoing evaluation of the site conceptual model, the Chemplex Parties have been contracting with Iowa Geological Survey to perform bedrock geophysics work along the Western and Eastern Unnamed Tributaries and Rock Creek. This first round of work was performed in

November 2021. A report describing the findings from this work was submitted during June 2022. Based on these results, a work plan for a second round of work was submitted during July 2022 and finalized in August 2022. This second round of work was completed during Fall 2022 and Spring 2023. Results of this work, including updated bedrock topography mapping, were presented to EPA during a phone call on 10 January 2024 and were documented in a report initially submitted in September 2024, then resubmitted in December 2024 to address EPA comments.

Based on the Site Conceptual Model findings, the Chemplex Parties submitted a plume control investigation work plan in February 2024, with a revised work plan submitted in April 2024 to address EPA comments. The work plan described proposed investigation work in the Well 3 Area as well as further investigation near the East Tributary to support future hot-spot injection.

Field investigation was performed in the Well 3 Area during April 2024 to support the planned hot-spot injection event. Findings and a work plan for injection were presented in an Investigation Report and Injection Plan submitted to EPA during September 2024, with a revised report submitted during December 2024 based on EPA comments. EPA provided a second set of comments on this document during December 2024, and a third set of comments on 28 January 2025. The Chemplex Parties submitted a finalized Investigation Report and Injection Plan on 24 March 2025. The Well 3 injection work is currently planned to occur during Spring 2026.

During April and May 2024, the Chemplex Parties installed two new monitoring wells (MW-150 and MW-151) in the East Trib area to support potential hot-spot injections in the East Region. These monitoring wells were sampled in July and August 2024, with the results described in a Construction Summary Report submitted to EPA during September 2024. The report proposed the installation of passive flux meters in Well MW-150 to support potential plume control work in the vicinity of this well. The final version of this Report was finalized on 5 June 2025 after a round of EPA comments, and this work is expected to proceed during Spring 2026.

2025 CORRESPONDENCE

Significant documents submitted to EPA and other agencies in 2025 are listed below:

- 27 January 2025: *Well 3 Plume Control Investigation Report and Injection Plan (revision)*, prepared by GHD Services, Inc.
- 28 January 2025: *MW-150 and MW-151 Construction Completion Report*, prepared by GHD Services, Inc.
- 5 February 2025: *Annual Report for Reporting Period 1 January through 31 December 2024*, prepared by EKI Environment & Water, Inc.
- 5 February 2025: *Addendum to Performance Monitoring Evaluation Plan for 2025*, prepared by EKI Environment & Water, Inc.
- 24 March 2025: *Well 3 Plume Control Investigation Report and Injection Plan (final)*, prepared by GHD Services, Inc.

- 5 June 2025: *MW-152, MW-153WT, MW-153A, MW-154 Well Installation*, prepared by GHD Services, Inc.
- 5 June 2025: *MW-150 and MW-151 Construction Completion Report*, prepared by GHD Services, Inc.
- 9 June 2025: *Summary of Results from Fourth Quarter 2024 In-Situ Groundwater and Surface Water Sampling Events*, prepared by EKI Environment & Water, Inc.
- 2 July 2025: *Summary of Results from First Quarter 2025 Groundwater Sampling Event*, prepared by EKI Environment & Water, Inc.
- 7 August 2025: *Quality Assurance Project Plan for the Performance Monitoring Evaluation Operable Unit No. 1*, prepared by GHD Services, Inc.
- 19 October 2025: *Summary of Results from Second Quarter 2025 In-Situ Groundwater and Surface Water Sampling Event*, prepared by EKI Environment & Water, Inc.
- 9 December 2025: *Summary of Results from Third Quarter 2025 Groundwater Sampling Event*, prepared by EKI Environment & Water, Inc.

PLANNED ACTIVITIES

Anticipated activities during the upcoming year are listed below, along with their approximate dates:

Submittal of Sampling Results from Fourth Quarter 2025 Sampling Event	February or March 2026
First Quarter 2026 Sampling Event	February or March 2026
Submittal of Sampling Results from First Quarter 2026 Sampling Event	Second Quarter 2026
Hot-Spot Injection in Well 3 Area	Second Quarter 2026
Mass Flux Investigation in Well MW-150	Second Quarter 2026
Second Quarter 2026 Sampling and Gauging Event	May 2026
Third Quarter 2026 Sampling Event	July or August 2026
Submittal of Sampling Results from Second Quarter 2026 Sampling Event	Third Quarter 2026
Fourth Quarter 2026 Sampling and Gauging Event	October or November 2026
Submittal of Next Annual Report	31 January 2027

Letter to Ms. Price
U.S. Environmental Protection Agency, Region 7
2 February 2026
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Please call me at (650) 292-9100 with questions or comments.

Very truly yours,

EKI ENVIRONMENT & WATER, INC.

A handwritten signature in black ink, appearing to read 'C. David Umezaki', with a long horizontal flourish extending to the right.

C. David Umezaki
Project Manager

cc: Matthew Graesch (Iowa Department of Natural Resources) – electronic only
J. Preston Turner, Esq. (Citigroup) – electronic only
Erick Hetrick (Chevron Environmental Management Company) – electronic only
Emily Venters (Equistar) – electronic only
Mike Cross – electronic only
Jessica Merrigan, Esq. (Spencer Fane Britt & Browne LLP) – electronic only
Michael Alowitz (GHD) – electronic only

TABLE 1
Summary of Sampling Program for 2025
Chemplex Site
Clinton, Iowa

Sampling Location	Proposed 2025 Frequency	Actual 2025 Frequency	Rationale for Change
3	Semiannual	Semiannual	-
ARC MW-7D	Semiannual	Semiannual	-
ARC MW-200B	Semiannual	Semiannual	-
ARC MW-200C	Semiannual	Semiannual	-
ARC MW-200D	Semiannual	Semiannual	-
ARC MW-201B	Annual	Annual	-
ARC MW-201C	Annual	Annual	-
ARC MW-203B	Semiannual	Semiannual	-
ARC MW-204B	Semiannual	Semiannual	-
ARC MW-204CD	Semiannual	Semiannual	-
ARC MW-205B	Annual	Annual	-
ARC MW-205C	Annual	Annual	-
ARC MW-205D	Annual	Annual	-
ARC MW-206B	Annual	Annual	-
ARC MW-207B	Semiannual	Semiannual	-
ARC MW-207C	Semiannual	Semiannual	-
ARC MW-208B	Annual	Annual	-
ARC MW-208C	Annual	Annual	-
ARC MW-211C	Semiannual	Semiannual	-
DG-16	Annual	Annual	-
DG-18B	Semiannual	Semiannual	-
DG-21B	Semiannual	Semiannual	-
DG-21C	Semiannual	Semiannual	-
EW-6c	Annual	Annual	-
EW-7a	Semiannual	Semiannual	-
EW-11a	Semiannual	Semiannual	-
EW-11b	Annual	Annual	-
EW-11c	Annual	Annual	-
EW-13b	Annual	Annual	-
EW-14c	Semiannual	Semiannual	-
MUNCK	Annual	Annual	-
MW-10B	Annual	Annual	-
MW-10C	Annual	Annual	-
MW-13B	Semiannual	Semiannual	-
MW-13C	Annual	Annual	-
MW-13D	Semiannual	Semiannual	-
MW-18B	Annual	Annual	-
MW-18C	Semiannual	Semiannual	-
MW-28C	Once	Once	-
MW-28D	Once	Once	-
MW-53A	Semiannual	Semiannual	-
MW-54	Annual	Annual	-
MW-54-1	Annual	Annual	-

TABLE 1
Summary of Sampling Program for 2025
Chemplex Site
Clinton, Iowa

Sampling Location	Proposed 2025 Frequency	Actual 2025 Frequency	Rationale for Change
MW-56	Annual	Annual	-
MW-56-1	Annual	Annual	-
MW-57-1	Semiannual	Semiannual	-
MW-70	Annual	Annual	-
MW-71-1	Annual	Annual	-
MW-73	Semiannual	Semiannual	-
MW-73-2	Semiannual	Semiannual	-
MW-82B	Annual	Annual	-
MW-82C	Annual	Annual	-
MW-85B	Semiannual	Semiannual	-
MW-85C	Annual	Annual	-
MW-94A	Annual	Annual	-
MW-97A	Semiannual	Semiannual	-
MW-97C	Semiannual	Semiannual	-
MW-99A	Semiannual	Semiannual	-
MW-100B	Annual	Annual	-
MW-100C	Semiannual	Semiannual	-
MW-103B	Semiannual	Semiannual	-
MW-103C	Semiannual	Semiannual	-
MW-103D	Semiannual	Semiannual	-
MW-104B	Annual	Annual	-
MW-104C	Annual	Annual	-
MW-105B	Semiannual	Semiannual	-
MW-105C	Semiannual	Semiannual	-
MW-106A	Semiannual	Semiannual	-
MW-106B	Semiannual	Semiannual	-
MW-106C	Semiannual	Semiannual	-
MW-107A	Semiannual	Semiannual	-
MW-107B	Semiannual	Semiannual	-
MW-107C	Semiannual	Semiannual	-
MW-108B	Semiannual	Semiannual	-
MW-108C	Semiannual	Semiannual	-
MW-109B	Semiannual	Semiannual	-
MW-109C	Semiannual	Semiannual	-
MW-110B	Semiannual	Semiannual	-
MW-111B	Semiannual	Semiannual	-
MW-112A	Annual	Annual	-
MW-113A	Semiannual	Semiannual	-
MW-116A	Semiannual	Semiannual	-
MW-117B	Annual	Annual	-
MW-117C	Annual	Annual	-
MW-118C	Semiannual	Semiannual	-
MW-119A	Semiannual	Semiannual	-
MW-119B	Semiannual	Semiannual	-
MW-119C	Semiannual	Semiannual	-
MW-119WT	Semiannual	Semiannual	-
MW-120A	Annual	Annual	-
MW-120B	Annual	Annual	-

TABLE 1
Summary of Sampling Program for 2025
Chemplex Site
Clinton, Iowa

Sampling Location	Proposed 2025 Frequency	Actual 2025 Frequency	Rationale for Change
MW-121A	Annual	Annual	-
MW-121B	Annual	Annual	-
MW-121C	Annual	Annual	-
MW-122A	Annual	Annual	-
MW-122B	Annual	Annual	-
MW-122C	Annual	Annual	-
MW-125A	Semiannual	Semiannual	-
MW-125B	Semiannual	Semiannual	-
MW-125C	Semiannual	Semiannual	-
MW-125D	Semiannual	Semiannual	-
MW-125WT	Semiannual	Semiannual	-
MW-127A	Semiannual	Semiannual	-
MW-127B	Semiannual	Semiannual	-
MW-127C	Semiannual	Semiannual	-
MW-127D	Semiannual	Semiannual	-
MW-129A	Semiannual	Semiannual	-
MW-130A	Semiannual	Semiannual	-
MW-130B	Semiannual	Semiannual	-
MW-130C	Semiannual	Semiannual	-
MW-130D	Semiannual	Semiannual	-
MW-130WT	Semiannual	Semiannual	-
MW-131WT	Annual	Annual	-
MW-133A	Semiannual	Semiannual	-
MW-133B	Semiannual	Semiannual	-
MW-133C	Semiannual	Semiannual	-
MW-133D	Semiannual	Semiannual	-
MW-134A	Semiannual	Semiannual	-
MW-134B	Semiannual	Semiannual	-
MW-134C	Semiannual	Semiannual	-
MW-134D	Semiannual	Semiannual	-
MW-134WT	Semiannual	Semiannual	-
MW-135A	Semiannual	Semiannual	-
MW-135B	Semiannual	Semiannual	-
MW-135C	Semiannual	Semiannual	-
MW-135D	Semiannual	Semiannual	-
MW-136A	Semiannual	Semiannual	-
MW-136B	Semiannual	Semiannual	-
MW-136C	Semiannual	Semiannual	-
MW-136D	Semiannual	Semiannual	-
MW-137B	Semiannual	Semiannual	-
MW-137C	Semiannual	Semiannual	-
MW-139A	Semiannual	Semiannual	-
MW-139B	Semiannual	Semiannual	-
MW-139C	Semiannual	Semiannual	-
MW-139D	Semiannual	Semiannual	-
MW-139E	Semiannual	Semiannual	-
MW-139WT	Semiannual	None	Could not be sampled due to tree roots
MW-145A	Semiannual	Semiannual	-

TABLE 1
Summary of Sampling Program for 2025
Chemplex Site
Clinton, Iowa

Sampling Location	Proposed 2025 Frequency	Actual 2025 Frequency	Rationale for Change
MW-145B	Semiannual	Semiannual	-
MW-145C	Semiannual	Semiannual	-
MW-145D	Semiannual	Semiannual	-
MW-145E	Semiannual	Semiannual	-
MW-145WT	Semiannual	Semiannual	-
MW-150	Quarterly	Quarterly	-
MW-151	Quarterly	Quarterly	-
MW-152	Quarterly	Quarterly	-
MW-153A	Quarterly	Quarterly	-
MW-153WT	Quarterly	Quarterly	-
MW-154	Quarterly	Quarterly	-
SW-0.5	Semiannual	Semiannual	-
SW-1	Semiannual	Semiannual	-
SW-1.5	Semiannual	Semiannual	-
SW-2	Semiannual	Semiannual	-
SW-3	Semiannual	Semiannual	-
SW-4	Semiannual	Semiannual	-
SW-7	Semiannual	Semiannual	-
SW-8	Semiannual	Semiannual	-
Thompson	Once	Once	-
Well 1Q	Once	Once	-
Well 3Q	Once	Once	-
Well 4Q	Once	Once	-
Well 6Q	Once	Once	-
Well 7Q	Once	Once	-
3305 9th Street	Quarterly	Quarterly	-
3311 9th Street	Quarterly	Quarterly	-

Notes:

(1) 2025 sampling frequency:

Annual or Once - location to be sampled once, in Second Quarter 2025.

Semiannual - locations to be sampled twice, in the Second and Fourth Quarters of 2025.

Quarterly - locations to be sampled four times, in First, Second, Third, and Fourth Quarters of 2025.

Sampling frequencies differing from the planned frequency are shown in ***bold italic*** type.