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17 February 2026

Laura Price
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

Subject: Chemplex Site, Clinton, Iowa--First Operable Unit
2026 Contingency Plan
(EKI 890052.71)

Dear Ms. Price:

On behalf of the Chemplex Parties, EKI Environment & Water, Inc. (EKI) is submitting this 2026 Contingency Plan to the United States Environmental Protection Agency, Region 7 (EPA). This 2026 Contingency Plan is intended to supersede the 2020 Contingency Plan, dated 13 January 2021.

This 2026 Contingency Plan describes procedures for determining response actions based on the requirements of the Amended Consent Decree, which was entered on 27 August 2019.

BACKGROUND

The original Contingency Plan was developed in support of the remedy revision process in anticipation of an Amended Consent Decree. In June 2015, the Chemplex Parties submitted a Contingency Plan to EPA that was based heavily on contingency measures developed during a previous performance test of the revised remedy. Contingency measures included in the June 2015 Contingency Plan consisted of the following:

- Construction of contingency well clusters for trigger level exceedances within a "Contingency Well Trigger Zone";

- An increase in sampling frequency, construction of contingency well clusters, and submittal of a Technical Memorandum for trigger level exceedances within a "Heightened Awareness Zone";

- Sampling of private wells, potential vapor monitoring, provision of alternate water supply or home water treatment for downgradient residences, and submittal of a Technical Memorandum for trigger level exceedances within an "Expedited Contingency Zone"; and

- Installation of warning signs and fencing, and submittal of a Technical Memorandum for trigger level exceedances in surface water.

In November 2017, a revised Contingency Plan was submitted that included the above contingency measures but modified trigger levels for vapor intrusion based on 2015 EPA vapor intrusion guidance.

In 2019 and 2020, based on detections of tetrachloroethene (PCE) at wells located in areas southeast of the Chemplex site, a revised Contingency Plan was prepared at EPA's request. The revisions to the Contingency Plan included additional contingency actions to address groundwater migration to areas beyond the original Expedited Contingency Zone as well as revisions to address potential vapor intrusion in downgradient locations. The final version of this Contingency Plan was submitted on 13 January 2021.

This 2026 Contingency Plan updates the 2020 Contingency Plan to account for changes at the Site over the past several years and replaces the monitoring zone approach with a trigger well approach and updated contingency actions. Specifically, this updated Contingency Plan utilizes the expanded monitoring network to focus trigger wells and contingency actions in the downgradient areas in support of the exposure control remedy. In addition, this Contingency Plan addresses a previous EPA comment requesting that a trigger level be included for cis-1,2-dichloroethene (cis-1,2-DCE).

GENERAL CONTINGENCY EVALUATION APPROACH

Whether a contingency action will be triggered depends on the results of ongoing groundwater and surface water monitoring. To help determine whether contingency actions are appropriate in a given situation, several groundwater monitoring wells have been designated as trigger wells, as shown on Figure 1 and listed in Table 1. Trigger wells fall into two categories:

- Trigger Wells for Groundwater Actions: Shown in blue on Figure 1, these wells will trigger multiple contingency actions related to potential downgradient impacts of volatile organic compound (VOC)-containing groundwater in the vicinity of the well. These wells were selected to bound the known groundwater plume along its downgradient and sidegradient edges.

- Trigger Wells for Vapor Actions: Shown in green on Figure 1, these wells will trigger multiple contingency actions related to impacts of potential VOC-containing vapors in the vicinity of the well. These wells were selected for their shallow screens at the water table level and their proximity to existing residences that could have potential exposure to any potential VOC-containing vapors.

In addition to the trigger wells, surface water sampling results from selected locations will also be compared against surface water trigger levels to determine the need for surface water contingency

actions. As described later in this plan, contingency actions may also be implemented based on analytical results from private wells that are not necessarily trigger wells.

Proposed trigger levels and the associated contingency measures are summarized in Table 2. The rationale for the trigger levels is described in the notes of Table 2. In general, the trigger levels match those set forth in the 2020 Contingency Plan, with the exception of a new vapor action trigger level for cis-1,2-DCE based on the current EPA vapor intrusion screening level calculator.

The trigger wells and contingency measures could be modified in the future based on additional site knowledge, existing monitoring networks, or changes to downgradient water or land use.

As shown in Table 2, the chemicals with trigger levels are limited to PCE and its immediate degradation products, which include trichloroethene (TCE), cis-1,2-DCE, and vinyl chloride. Although there are other compounds present at the Chemplex Site, including benzene, toluene, ethylbenzene, and xylenes (BTEX), polynuclear aromatic hydrocarbons (PAHs), and 1,1-dichloroethene (1,1-DCE), there is no evidence that these other compounds have migrated from the Chemplex Site across the TI Zone Boundary. Detections of other COCs outside the technical impracticability (TI) Zone will be evaluated and acted upon on a case-by-case basis depending on whether the detected compounds appear to originate from the Chemplex Site or from another local source. If changes to the conceptual model indicate that detections of other compounds are attributable to the Chemplex Site, the Chemplex Parties will evaluate whether other contingency actions are warranted.

GROUNDWATER CONTINGENCY ACTIONS

As described in Table 2, if a trigger level is exceeded in one of the wells classified as a Trigger Well for Groundwater Actions, the following contingency actions will be implemented:

- **A new well cluster will be constructed downgradient of the well with the trigger level exceedance.** The new well cluster will consist of five wells, with one well screened in each of the following layers: Overburden, Lower Scotch Grove, Farmers Creek, Lower Hopkinton, and Blanding. The exact location of the well cluster will be as agreed upon between the Chemplex Parties and EPA, and will be subject to accessibility and land availability issues. Construction of the well cluster will be initiated within 90 days of receiving EPA approval of a work plan documenting the location and planned details. All wells in the new well cluster will be classified as "Trigger Wells for Groundwater Actions" and will be sampled twice per year and gauged as part of each routine water level gauging event at the Chemplex Site.

- **If the well with the trigger level exceedance is screened within the Lower Hopkinton layer and no deeper well exists in that well cluster, then a new well within the same well cluster will be constructed, screened within the Blanding layer.** The exact location of the well will be as agreed upon between the Chemplex Parties and EPA, and will be subject to

accessibility and land availability issues. Construction of the well will be initiated within 90 days of receiving EPA approval of a work plan documenting the location and planned details. The new well will be classified as a "Trigger Well for Groundwater Actions" and will be sampled twice per year and gauged as part of each routine water level gauging event at the Chemplex Site.

- **If the well with the trigger level exceedance is screened within the Overburden layer but not at the water table interval, and if no water table well exists in that well cluster (i.e., there is no well within the well cluster with a "WT" suffix in the well ID), then a new water table well within the same well cluster will be constructed.** The exact location of the well will be as agreed upon between the Chemplex Parties and EPA, and will be subject to accessibility and land availability issues. Construction of the well will be initiated within 90 days of receiving EPA approval of a work plan documenting the location and planned details. The new well will be classified as a "Trigger Well for Vapor Actions" and will be sampled twice per year and gauged as part of each routine water level gauging event at the Chemplex Site.

- **The Chemplex Parties will contact all residents with a well located within a quarter mile of the well with the trigger level exceedance and extend offers to either install a whole-house filtration system or a connection to the existing municipal water line, if not already connected**. The offer will be extended within 30 days of the confirmed exceedance. All installation and construction costs will be paid for by the Chemplex Parties. The schedule of the installation will be determined through coordination with residents and the City of Camanche and will depend on weather and equipment availability.

- **All surface water bodies located within a quarter mile of the well with the trigger level exceedance to which access is provided by landowners will be sampled for VOCs, with the results to be compared against the surface water trigger levels in Table 2.** Sampling will occur within 30 days of obtaining property owner access to the surface water bodies. This may not require new surface water monitoring locations.

- **The sampling frequency for the well cluster with the trigger level exceedance will be increased to quarterly for a period of one year, effective immediately.** After this year of increased monitoring, the Chemplex Parties will reassess the monitoring frequencies in this well cluster in conjunction with EPA.

VAPOR CONTINGENCY ACTIONS

As described in Table 2, if a trigger level is exceeded in one of the wells classified as a Trigger Well for Vapor Actions, the following contingency actions will be implemented:

- **Within 45 days of a confirmed exceedance in a shallow water-table well, the Chemplex Parties will submit a Vapor Intrusion Evaluation Report** evaluating the potential for intrusion of VOC vapors into downgradient residences and/or non-residential buildings.

  If there is a potential for significant vapor intrusion into downgradient residences and/or non-residential buildings based on the evaluation in the Vapor Intrusion Evaluation Report, then the Report will include a proposal for a monitoring program, or if immediate mitigative action is deemed appropriate, a vapor intrusion mitigation program. The appropriate measures will depend on site-specific factors such as VOC concentrations, type of building, and potential exposure routes. The timeframe for the monitoring and/or mitigation programs will depend on the extent of the required response measures and will be outlined in the Vapor Intrusion Evaluation Report.

  In the event that an owner refuses access to a property for vapor intrusion investigation or mitigation, for as long as the conditions listed above are met for a particular residence, the offer will be extended on at least an annual basis. In addition, the offer will be extended within 30 days of the Chemplex Parties becoming aware of a change in ownership.

SURFACE WATER CONTINGENCY ACTIONS

As described in Table 2, if a trigger level is exceeded in a surface water sampling location, the following contingency actions will be implemented:

- **Within 45 days of a confirmed trigger level exceedance, the Chemplex Parties will erect signs in the area of the exceedance to inform people potentially using the surface water body for recreation about the possible hazard**, subject to the concurrence of property owners. To the extent feasible based on field conditions and approvals from property owners, localized fencing will be considered to limit recreational access to the surface water body at the location of the exceedance, if not already fenced or located on secure property.

- **Within 45 days of a confirmed trigger level exceedance, the Chemplex Parties will submit to EPA a Technical Memorandum evaluating the need for additional contingency measures**, including, if appropriate, measures to protect ecological receptors. In this Technical Memorandum, the feasibility of potential contingency measures will be evaluated. The Technical Memorandum will describe procedures and schedule for implementing the selected contingency measures.

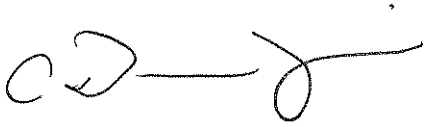
PRIVATE WELL CONTINGENCY ACTIONS

In addition to the contingency actions listed above and in Table 2, in the event that PCE is detected and confirmed in any private well at a concentration exceeding the laboratory reporting limit, the Chemplex Parties will **extend an offer to either install a whole-house filtration system or a connection to the existing municipal water line.** Such an offer will be extended within 30 days of the confirmed detection. Because private wells represent potential direct exposure pathways for residents, the reporting limit for PCE will be conservatively used as a trigger level rather than the trigger levels listed in Table 2. Contingency measures are already in place for one residence with PCE detected in private well water.

Please call me at (650) 292-9079 with questions or comments.

Very truly yours,

EKI ENVIRONMENT & WATER, INC.



C. David Umezaki
Project Manager

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TABLE 1
Proposed Trigger Wells
Chemplex Site--Clinton, Iowa

Trigger Well Location	Stratigraphic Layer	Trigger Well Type
Bark (3305 9th Street Spigot)	Unknown Bedrock	Trigger Well for Groundwater Actions
MW-56	FC	Trigger Well for Groundwater Actions
MW-56-1	USG	Trigger Well for Groundwater Actions
MW-71-1	USG	Trigger Well for Groundwater Actions
MW-104B	LSG	Trigger Well for Groundwater Actions
MW-104C	FC	Trigger Well for Groundwater Actions
MW-119WT	OVB	Trigger Well for Vapor Actions
MW-121A	OVB	Trigger Well for Groundwater Actions
MW-121B	LSG	Trigger Well for Groundwater Actions
MW-121C	FC	Trigger Well for Groundwater Actions
MW-122A	OVB	Trigger Well for Groundwater Actions
MW-122B	LSG	Trigger Well for Groundwater Actions
MW-122C	FC	Trigger Well for Groundwater Actions
MW-125WT	OVB	Trigger Well for Vapor Actions
MW-130WT	OVB	Trigger Well for Vapor Actions
MW-133WT	OVB	Trigger Well for Vapor Actions
MW-134A	OVB	Trigger Well for Groundwater Actions
MW-134B	LSG	Trigger Well for Groundwater Actions
MW-134C	FC	Trigger Well for Groundwater Actions
MW-134D	LH	Trigger Well for Groundwater Actions
MW-134WT	OVB	Trigger Well for Vapor Actions
MW-136A	OVB	Trigger Well for Groundwater Actions
MW-136B	LSG	Trigger Well for Groundwater Actions
MW-136C	FC	Trigger Well for Groundwater Actions
MW-136D	LH	Trigger Well for Groundwater Actions
MW-139A	OVB	Trigger Well for Groundwater Actions
MW-139B	LSG	Trigger Well for Groundwater Actions
MW-139C	FC	Trigger Well for Groundwater Actions
MW-139D	LH	Trigger Well for Groundwater Actions
MW-139E	BL	Trigger Well for Groundwater Actions
MW-145A	OVB	Trigger Well for Groundwater Actions
MW-145B	LSG	Trigger Well for Groundwater Actions
MW-145C	FC	Trigger Well for Groundwater Actions
MW-145D	LH	Trigger Well for Groundwater Actions
MW-145E	BL	Trigger Well for Groundwater Actions
MW-145WT	OVB	Trigger Well for Vapor Actions

Abbreviations:
BL = Blanding
FC = Farmers Creek
LH = Lower Hopkinton
LSG = Lower Scotch Grove
OVB = Overburden
USG = Upper Scotch Grove

TABLE 2

Trigger Levels for Contingency Measures

Chemplex Site -- Clinton, Iowa

Sampling Point Type	Trigger Levels (ug/L) (a)				Contingency Actions if a Trigger Level is Exceeded	Timeframe
	PCE	TCE	cis-1,2-DCE	VC		
Trigger Well for Groundwater Actions	5	5	70	2	(1) Construct downgradient trigger well cluster, with wells screened in Overburden, Lower Scotch Grove, Farmers Creek, Lower Hopkinton, and Blanding formation	Initiate construction within 90 days of receiving approval from EPA of work plan documenting location and planned details
					(2) If well exceeding trigger level is screened within the Lower Hopkinton layer and no Blanding well exists in the well cluster, construct a Blanding well within the same well cluster	Initiate construction within 90 days of receiving approval from EPA of work plan documenting location and planned details
					(3) If well exceeding trigger level is screened within the Overburden layer and no water table well exists in the well cluster, construct a water table well within the same well cluster	Initiate construction within 90 days of receiving approval from EPA of work plan documenting location and planned details
					(4) Extend offer to all residences with a well located within a quarter mile to either install a whole-house GAC filtration system or connect to the municipal water line	Within 30 days of confirmed exceedance
					(5) Sample surface water bodies located within a quarter mile for comparison against surface water trigger levels	Within 30 days of obtaining access to surface water bodies
					(6) Increase sampling frequency for the well cluster with the trigger level exceedance to quarterly for one year.	Immediately
Trigger Well for Vapor Actions	15	1.2	250	0.15	(1) Submit a Vapor Intrusion Evaluation Report evaluating the potential for vapor intrusion into downgradient residences. If there is a potential for significant vapor intrusion, the Report will include a proposed monitoring program and/or a vapor intrusion mitigation program, with timeframes outlined in the Report.	Within 45 days of confirmed exceedance
Surface Water Sampling Location	98	80	590	25	(1) Subject to the concurrence of property owners, erect signs and/or localized fencing in the area of the exceedance to inform people potentially using the surface water body for recreation about the possible hazard and to limit recreational access.	Within 45 days of confirmed exceedance
					(2) Submit a Technical Memorandum evaluating the need for additional contingency measures to protect ecological receptors, with timeframes to be outlined in the report.	Within 45 days of confirmed exceedance

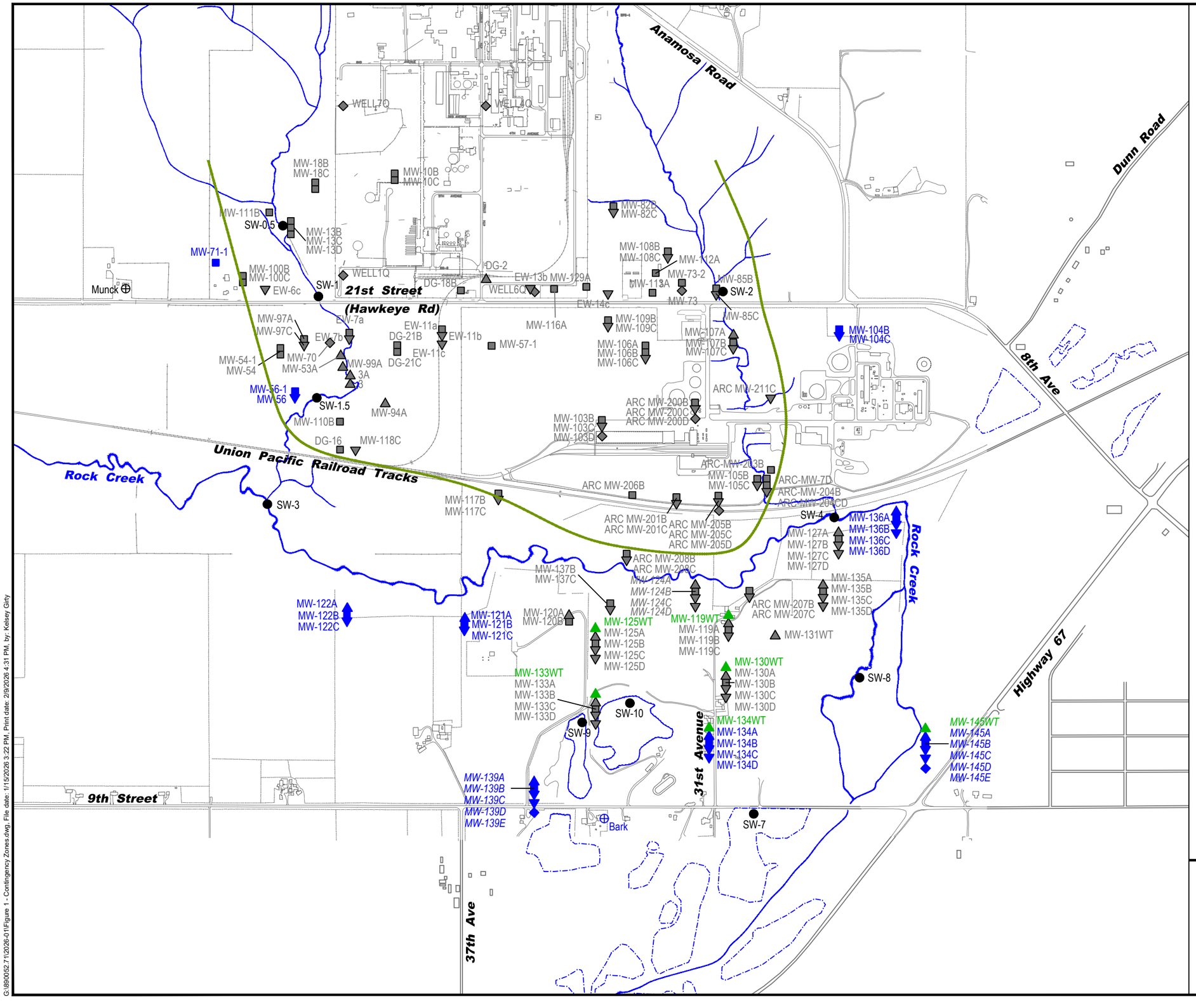
Notes:

(a) The trigger levels are based on the following:

- Trigger levels for vapor-related contingency actions are based on the EPA's Vapor Intrusion Screening Level Calculator, available at https://epa-visl.ornl.gov/cgi-bin/visl_search.
- Trigger levels for groundwater-related contingency actions are based on the Federal Maximum Contaminant Levels.
- The rationale for trigger levels for surface water contingency actions was described in the 2020 Contingency Plan.
- Trigger levels may change as the bases for the trigger levels are modified in the future.

TABLE 2
Trigger Levels for Contingency Measures
Chemplex Site -- Clinton, Iowa

Abbreviations:
cis-1,2-DCE = cis-1,2-Dichloroethene
EPA = United States Environmental Protection Agency
PCE = Tetrachloroethene
TCE = Trichloroethene
ug/L = micrograms per liter
VC = Vinyl Chloride



Legend:

Technical Impracticability Zone Boundary

Monitoring Network Wells:

- Overburden Well
- Scotch Grove Well
- Farmers Creek or Lower Hopkinton Well
- Well Screened in Both Scotch Grove and Farmers Creek
- Blanding or Deeper Well

Residential Wells:

- Monitored Residential Well

Trigger Well Locations:

- Trigger Wells for Groundwater Actions
- Trigger Wells for Vapor Actions

Other Sample Locations:

- Existing Surface Water Sample Location
- Contingency Surface Water Sample Location

N

0 1000 2000

(Scale in Feet)

Monitoring Network and Trigger Wells

Chemplex Site, First OU
Clinton, Iowa
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EKI 890052.71

Figure 1

eki environment & water

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