



REGION 7

LENEXA, KS 66219

January 2, 2024

EMERGENCY ACTION MEMORANDUM

SUBJECT: Request for an Emergency Removal Action at the Downtown Wells White Cleaners Site Pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104

FROM: Mike B. Davis, On-Scene Coordinator
Site Assessment and Support Section

THRU: Todd H. Davis, Supervisor
Site Assessment and Support Section

TO: Adam Ruiz, Manager
Assessment, Emergency Response, and Removal Branch

I. PURPOSE

The purpose of this Action Memorandum is to document the decision to initiate emergency response actions described herein for the Downtown Wells White Cleaners site (IAN000706717) located at 215 S. Wilson Avenue in Jefferson, Iowa, pursuant to the On-Scene Coordinator's delegated authority under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104. On November 29-30, 2023, the U.S. Environmental Protection Agency conducted indoor air and sub-slab gas sampling in the Wilson Avenue Suites apartment building located at 215 S. Wilson Avenue. This apartment building is the former White Cleaners dry cleaning facility. The sampling was part of an investigation into the past release of tetrachloroethylene (PCE) at the Downtown Wells Site (IAN000740896) in Jefferson, Iowa. The Downtown Wells site is a groundwater plume site with no identifiable source consisting of cis-1,2-DCE, a breakdown product of PCE, in the city of Jefferson's public drinking water wells. Multiple former dry cleaners, including White Cleaners, were identified as potential sources for the contaminated public wells.

II. SITE INFORMATION

A. Site Description

Site Name:	Downtown Wells White Cleaners
Superfund Site ID (SSID):	B7Q3
CERCLA Number:	IAN000706717
Site Location:	Jefferson, Iowa
Lat./Long.:	+42.013665, -94.374590
NPL Status:	Non-NPL
Removal Category:	Emergency
Nationally Significant:	No

B. Site Background

1. Removal site evaluation

A Pre-CERCLA Screening investigation was initiated in February 2020 for the Downtown Wells site and was completed on March 24, 2023, with a recommendation for further investigation under a Preliminary Assessment based on site history and sampling results. A Preliminary Assessment was initiated in March 2023 to identify potential sources for the cis-1,2-DCE contamination in the city of Jefferson public wells that is being investigated as part of the Downtown Wells site.

In November 2019, the EPA conducted limited groundwater sampling at industrial facilities identified as potential source areas for the Downtown Wells site. No chlorinated volatile organic compounds (VOCs) were detected. In July 2020, additional groundwater sampling was conducted to investigate five former dry-cleaning sites located in the downtown area of Jefferson near the contaminated public wells. Cis-1,2-DCE was detected in one groundwater sample near the Rohovit Cleaners and Laundromat, and additional investigation was recommended near all five of the former dry-cleaning sites.

In October 2023, the EPA conducted additional groundwater and vapor intrusion sampling at the five dry cleaning sites. Soil-gas, sub-slab, and indoor air samples from the former White Cleaners property, located at 215 South Wilson Ave, documented a complete vapor intrusion pathway within the building. The former White Cleaners is now the Wilson Avenue Suites apartment building. PCE, TCE, cis-1,2-DCE and trans-1,2-DCE were detected in sub-slab and indoor air. Trans-1,2-DCE levels were above the EPA Removal Management Level (RML).

On November 29-30, the EPA conducted additional indoor air and sub-slab gas sampling in the Wilson Avenue Suites apartment building that was the former White Cleaners dry cleaning facility. As a result of the sampling, the EPA found one occupied apartment unit in Wilson Avenue Suites with sub-slab and indoor air samples containing elevated levels of PCE. PCE in indoor air was measured at 74.6 ug/m³ and sub-slab was measured at 29,436 ug/m³. At this time, the White Cleaners facility was identified as a subsite of the Downtown Wells site and was named Downtown Well White Cleaners.

2. Physical location and site characteristics

The Downtown Wells White Cleaners site is located at 215 South Wilson Avenue. This site was discovered during investigation of the Downtown Wells site, located at 204 West Washington Street, Jefferson, Iowa. The Downtown Wells site is a groundwater plume site with no identifiable source consisting of cis-1,2-DCE, a breakdown product of PCE, in the city of Jefferson's public drinking water wells. Multiple former dry cleaners are located in downtown Jefferson Iowa. The former White Cleaners dry cleaner operated in the 1950s at 215 South Wilson Avenue. Exact operation dates are unknown at this time. After ceasing operations, the building was turned into an apartment complex known as White Apartments and was recently renovated and opened as Wilson Avenue Suites in June 2022. The surrounding area is a mix of residential and commercial buildings.

The EPA has conducted an environmental justice (EJ) review of the areas currently assessed using EJScreen, the EPA's EJ mapping and screening tool. EJScreen provides a nationally consistent dataset and approach for combining environmental and demographic indicators. The EPA uses EJScreen to evaluate a community where a contaminated site is located to determine whether additional consideration, analysis, or outreach is appropriate, as determined by the site team, as the EPA plans for and conducts response actions in the community. According

to the EJScreen for this Site, the data does indicate potential areas of EJ concern. Per the EJScreen, the threshold for the following categories have been met, or exceeded, with regard to the community where the Site is located:

Socioeconomic indicators – 1.0 mile radius of the site

Over Age 64 – 86 percentile for the state

3. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

One of the apartment units in the Wilson Avenue Suites located within the Downtown Wells site shows concentrations of PCE in both the sub-slab and indoor air in excess of established RMLs. PCE is a hazardous substance as defined in CERCLA Section 101(14), 42 U.S.C. § 9601(14), and as designated in 40 CFR § 302.4. PCE has been detected above Removal Management Levels (RMLs) in indoor air and sub-slab.

III. THREATS TO PUBLIC HEALTH, WELFARE OR THE ENVIRONMENT

A. Nature of Actual or Threatened Release of Hazardous Substances or Pollutants or Contaminants

A release of PCE has been confirmed at the former White Cleaners dry cleaner building, now known as Wilson Avenue Suites, located within the Downtown Wells site. PCE and its degradation products, TCE, cis-1,2-DCE and trans-1,2-DCE, have been detected in indoor air samples collected from the Wilson Avenue Suites apartments at concentrations exceeding RMLs. Sub-slab soil gas RMLs have also been exceeded at building, indicating the presence of a sub-surface source.

B. Check Applicable Factors (from 40 CFR 300.415) Which Were Considered in Determining the Appropriateness of a Removal Action:

- ☒ Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)].
- ☐ Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].
- ☐ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that pose a threat of release [300.415(b)(2)(iii)].
- ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].
- ☐ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].
- ☐ Threat of fire or explosion [300.415(b)(2)(vi)].
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

IV. SELECTED REMOVAL ACTION AND ESTIMATED COSTS

A. Situation and Removal Activities to Date

1. Current situation

Sampling conducted by the EPA in November of 2023 documented the release of PCE and breakdown products into the environment. Indoor air and sub-slab soil gas samples collected from one apartment unit in the Wilson Avenue Suites building reported exceedances of applicable RMLs. These results indicate a complete exposure pathway. Sample results were communicated to the property owner the week of December 11. Site team meetings were held to develop a path forward to address the RML exceedances.

2. Removal activities to date

On November 29-30, 2023, the EPA conducted indoor air and sub-slab gas sampling in the Wilson Avenue Suites as part of a Preliminary Assessment of the Downtown Wells site. Sample results were received on December 12, a data evaluation was performed, and multiple site team meetings were held. The Wilson Avenue Suites property owner was contacted on December 13, 2023 to provide sample results and initiate discussions of potential mitigation efforts.

3. Enforcement

Where the responsible parties are known, an effort initially shall be made, to the extent practicable, to determine whether they can and will perform the necessary removal action promptly and properly. Exact dates of operation for the former White Cleaners are unknown at this time, however the building was built in 1950 and White Cleaners is known to be in operation in 1957. The building is currently owned by development corporation. The current owners are not believed to have ever owned or operated the building while it was being used as a dry cleaner.

B. Planned Removal Actions

1. Proposed action description

The removal action will include the placement of a portable high-volume air-purifying unit in the apartment where elevated levels of PCE have been recorded in the sub-slab and indoor air that pose a risk for actual or potential exposure to nearby human populations, specifically the residents of these homes, from hazardous substances, namely PCE. After the air purifying unit has been installed and allowed to run for at least 48 hours, follow-up indoor air sampling will be conducted to confirm the unit is functioning properly. Additional sampling will be performed on an as needed basis to further define the VI pathway and determine the presence of any additional exposures. Coordination with current property owner is ongoing and it is anticipated that the owner will perform all necessary actions for the installation of mitigation systems.

Vapor mitigation measures will be implemented to address observed vapor intrusion which poses, or has the potential to pose, an unacceptable human health risk. A complete exposure pathway is documented, and sub-slab soil vapor and indoor air concentrations exceeding the applicable RMLs for PCE. Vapor mitigation measures may include:

- installation of a sub-slab soil gas depressurization system;
- sealing cracks in walls and floors; and/or
- sealing or fixing drains or other preferential pathways (e.g., utilities).

As discussed above, these vapor mitigation measures may be implemented by the EPA, or by the current property owner. The EPA will verify the effectiveness of any vapor mitigation system by sampling indoor air following the installation of the system.

2. Contribution to remedial performance

The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the site.

3. Applicable or relevant and appropriate requirements (ARARs)

Removal actions conducted under CERCLA are required to attain ARARs to the extent practicable. Any identified potential ARARs will be evaluated and complied with to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted.

4. Project schedule

The response will be initiated shortly after the Action Memorandum is signed and will be complete once it has been confirmed by laboratory data that the portable air purifying system is functioning properly. This confirmatory sampling is anticipated to take place within 10 days of the placement of the air purifying system.

C. Estimated Costs*

Contractor Costs (ERRS/START staff, travel, equipment)	\$50,000
Other Extramural Costs (Strike Team, other Federal Agencies)	\$0
Contingency Costs (20% of subtotal)	\$10,000
Total Removal Project Ceiling	\$60,000

*** The EPA direct and indirect costs, although cost recoverable, do not count toward the removal ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 or CERCLA.**

V. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at this Site would increase the actual or potential threats to the public health and/or the environment.

VI. OUTSTANDING POLICY ISSUES

None.

VII. APPROVALS

This decision document represents the selected removal action for this site, developed in accordance with CERCLA as amended, and not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP section 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is \$60,000. This amount will be funded from the regional removal allowance.

Michael B. Davis
Federal On-Scene Coordinator

**VIII. ENDANGERMENT DETERMINATION UNDER CERCLA SECTION 106: HAZARDOUS
SUBSTANCES**

Pursuant to Section 106 of CERCLA, I have determined that there may be imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance from the Site.

Adam Ruiz, Manager
Assessment, Emergency Response and Removal Branch