REGION 7
LENEXA, KS 66219

ENFORCEMENT ACTION MEMORANDUM

SUBJECT: Approval for a Time-Critical Enforcement Removal Action at PCE North West Street Site, Sikeston, Scott County, Missouri

FROM: Brendan Martin, On-Scene Coordinator
Response, Removal and Oil Planning Section

Martin, Brendan
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Date: 2024.12.18 11:08:37 -06'00'

THRU: Todd Campbell, Acting Supervisor
Response, Removal and Oil Planning Section

Adam Ruiz, Manager
Assessment, Emergency Response and Removal Branch

TO: Robert D. Jurgens, Director
Superfund and Emergency Management Division

I. PURPOSE

The purpose of this Action Memorandum is to document approval of a Potentially Responsible Party-led (PRP-led) Removal Action at the PCE North West Street site. The site consists of an active commercial laundry facility and former dry cleaner (Facility), with a tetrachloroethylene (PCE) groundwater plume that has impacted two of the city of Sikeston's public drinking water wells. The Missouri Department of Natural Resources referred the site to the EPA for a Removal Action to address risk to the public wells and potential vapor intrusion. The general objective of this Removal Action will be to prevent the exposure of residential and commercial populations through ingestion and inhalation of PCE and related chemicals present in the groundwater at the site.

On November 25, 2024, the EPA signed an Administrative Settlement Agreement and Order on Consent (ASAOC) with Vestis Services, LLC, who is the PRP at the site, for performance of the Removal Action described in this Action Memorandum.

II. SITE CONDITIONS AND BACKGROUND

Site Name:	PCE North West Street Site
SSID #:	B7N8
CERCLA ID:	MON000706225
CERCLA Sequence #:	BB01
Category of Removal:	Time-Critical
Nationally Significant:	No
Site Location:	Sikeston, Missouri
Lat/Long:	36.880502°, -89.598978°
Potentially Responsible Party:	Vestis Services, LLC

A. Site Description

1. Removal site evaluation

The city of Sikeston's public drinking water well #8 (Well #8) has had detections of PCE since quarterly monitoring was required in 2006. PCE levels in Well #8 have exceeded the EPA Maximum Contaminant Level (MCL) of 5.0 micrograms per liter (ug/L) on two occasions in 2009. The city of Sikeston public drinking water well #13 (Well #13) was installed in 2013 and PCE was subsequently detected in the well in April and October 2021. The Sikeston Board of Municipal Utilities (BMU) Plant #3 blends and treats water from Well #8 and Well #13 to serve the city of Sikeston. PCE, and PCE-breakdown products trichloroethylene (TCE) and cis-1,2-dichloroethylene (cis-1,2-DCE) were detected in treated water from Plant #3 beginning in 2021 and have been identified in treated water at concentrations as high as 1.14 ug/L PCE, 1.45 ug/L TCE and 0.58 ug/L cis-1,2-DCE. In May 2024, Well #8 was taken out of service due to a reported lightning strike.

Sampling conducted by Vestis identified an area of impacted groundwater with PCE concentrations as high as 1,130 ug/L exceeding the MCL of 5 ug/L and the EPA commercial and residential vapor intrusion screening levels (VISLs) of 31 ug/L and 7 ug/L, respectively. PCE breakdown products have also been identified in the groundwater including TCE concentrations as high as 112 ug/L exceeding the MCL of 5 ug/L and commercial and residential VISLs of 1.9 and 0.62 ug/L, respectively, and cis-1,2-DCE concentrations as high as 310 ug/L exceeding the MCL of 70 ug/L and the commercial and residential VISLs of 130 and 31 ug/L, respectively.

On June 30, 2022, the MoDNR referred the site to the EPA via a Request for Federal Action.

2. Physical location

The site consists of a commercial laundry facility owned and operated by Vestis, formerly known as Aramark Uniform & Career Apparel, LLC (Aramark), located at 400 North West Street, Sikeston, Scott County, Missouri, and a PCE groundwater plume. The PCE groundwater plume has migrated [redacted] to the BMU property located at [redacted]. The BMU property contains two high-capacity public water supply wells, Well #8 located [redacted] of the Vestis facility and Well #13 located [redacted] of the Vestis facility. The lateral extent of the plume has not been fully defined at this time. The site is immediately surrounded by a mixture of commercial and industrial properties, followed by residential properties to the north, east and south. The closest residential property is approximately 900 feet both east and south of the Vestis Facility. The Lee Hunter Elementary School is located approximately 900 feet east of the Vestis Facility.

3. Site characteristics

The Vestis property located at 400 North West Street is the location of an active commercial laundry business. A wastewater treatment plant is located directly north of the building. The wastewater treatment system uses chemical demulsification and dissolved air flotation clarification to pre-treat wastewater on site.

The BMU property located [redacted], of the Vestis facility includes Well #8 and Well #13 that draw from the [redacted] The city of Sikeston Public Water System serves a population of 17,615. Well #8 and Well #13 supply water to BMU Water Treatment Plant #3 which serves approximately one quarter of the service population. [redacted]

The soil in the Sikeston area belongs to the Bosket fine sandy loam grouping. Soil composition in the area is comprised of 5 to 30 percent clay. Alluvium beneath the soil is mostly sand with lesser amounts of silt and clay. The soil and alluvium range in thickness from 135 to 195 feet in the area. Beneath the site, depth to groundwater is approximately 30 feet bgs and groundwater flow is primarily to the west-southwest. There is an apparent northwest to southeast-trending groundwater divide in the vicinity of the Vestis facility, where groundwater at the northeast portion of the Vestis property flows to the north or northeast. [redacted] With Well #8 pumping, water levels are affected at least 450 feet away. When Well #13 is pumping, the

most noticeable effect is a slight increase in the horizontal hydraulic gradient near the pumping well.

The EPA has conducted an environmental justice (EJ) review of the community where the proposed removal action is located using EJ Screen, the EPA's EJ mapping and screening tool. EJ Screen provides a nationally consistent dataset and approach for combining environmental and demographic indicators. The EPA uses EJ Screen to evaluate a community where a Superfund 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 EJ Screen for this proposed removal action, the data does indicate potential areas of EJ concern. The EJ Screen for this proposed removal action is included in the Administrative Record for the site.

Per the EJ Screen Report, these Socioeconomic Indicator categories met the above thresholds within the one-mile buffer:

Socioeconomic Indicators
People of Color – 84th percentile State
Low Income – 80th percentile USA
Under Age 5 – 80th percentile State/81st percentile USA

Borderline Socioeconomic Indicators
Unemployment Rate – 72nd percentile State
Less Than High School Education – 73rd percentile State

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

Tetrachloroethylene (PCE), a hazardous substance as defined in section 101(14) of CERCLA, 42 U.S.C. § 9601(14), has been released to the environment, including soil and groundwater at the site.

The Vestis property located at 400 North West Street is the location of a former dry cleaner that began operations in 1967 under the ownership of Todd Uniform LLC. From 1967 to 1995, operations at the facility included dry cleaning of welder's gloves and jackets using PCE, mineral spirits and Stoddard solvent. Historical dry-cleaning operations reportedly used PCE for a brief period from 1968 to 1969, which was piped into the building from one of the six underground storage tanks (USTs) located outside of and just north of the building. The Facility was purchased by Aramark in 1995 and has continued to operate as a commercial laundry under their ownership. In October 2023, Aramark spun off its uniform division and changed its name to Vestis.

In 2006, BMU first detected the volatile organic compounds benzene, PCE and the PCE breakdown products TCE and cis-1,2-DCE in Well #8 during a routine sampling event. MoDNR initiated quarterly monitoring following the detection of the volatile organic compounds in the well water. Since 2006, PCE, TCE and cis-1,2-DCE have been detected in most of groundwater samples collected from Well #8. PCE concentrations in Well #8 exceeded the MCL of 5.0 ug/L on two occasions in 2009. In 2013, BMU installed Well #13 [redacted] PCE was detected in Well #13 in April and October 2021. The BMU Water Treatment Plant #3 blends and treats water from Well #8 and Well #13 to serve the city of Sikeston. PCE and PCE-breakdown products TCE and cis-1,2-DCE, were detected in treated water from Plant #3 beginning in 2021 and have been identified in treated water at concentrations as high as 1.14 ug/L PCE, 1.45 ug/L TCE and 0.58 ug/L cis-1,2-DCE. In May 2024, Well #8 was taken out of service due to a reported lightning strike.

In response to a June 5, 2014, MoDNR information request, Aramark reported that a release of PCE occurred at the property in 1968 and was later confirmed in the 1995 sampling event. In 1968, Aramark reported that 2,000 gallons of PCE were delivered to the property, and a former Todd Uniform employee reported that a small leak of PCE occurred at one of the fittings connected to the UST. Following the leaking of the PCE, Todd Uniform reportedly switched to mineral spirits for the glove and jacket cleaning. By 1986, dry cleaning operations ceased at the facility, and the USTs were removed in 1987.

In 1995, the facility was sampled as part of an environmental investigation conducted at the request of Aramark prior to their purchase of the property from Todd Uniform. Concentrations of PCE were detected in one out of nine soil samples (68 micrograms per kilogram) and in three groundwater samples (340 ug/L, 130 ug/L, and 40 ug/L). All three groundwater samples with PCE detections exceeded the MCL of 5 ug/L, and the commercial and residential VISLs of 31 ug/L and 7.4 ug/L, respectively. The soil sample was collected at a depth of 10-12 feet bgs and the groundwater samples were collected at depths of approximately 30-33 feet bgs, all in the immediate vicinity of the former USTs.

In 2015, the MoDNR conducted a site Inspection that consisted of a groundwater sampling event that evaluated the former UST location on the Aramark property and multiple areas between the former UST location and Well #8. Groundwater sample results from the former UST location on the Aramark property exhibited a maximum concentration of 60 ug/L PCE and 5.3 ug/L TCE, confirming the area as a probable source location. PCE, TCE and cis-1,2 DCE were detected at concentrations above the MCLs in several locations between the former PCE UST on Aramark property and the BMU Well #8, suggesting that the PCE contamination detected in Well #8 was from the PCE release documented at the Aramark property.

Between 2016 and 2022, the MoDNR conducted oversight of Aramark investigation activities at the site. From 2016 to 2018, Aramark conducted a phased soil and groundwater investigation at the site to characterize the nature and extent of contamination. From 2019 to 2022, Aramark installed additional monitoring wells and conducted quarterly groundwater monitoring of the plume. Sampling conducted by Aramark/Vestis identified an area of impacted groundwater with PCE concentrations as high as 1,130 ug/L exceeding the MCL of 5 ug/L and the commercial and residential VISLs of 31 ug/L and 7 ug/L, respectively; TCE concentrations as high as 112 ug/L exceeding the MCL of 5 ug/L and commercial and residential VISLs of 1.9 and 0.62 ug/L, respectively; and cis-1,2-DCE concentrations as high as 310 ug/L exceeding the MCL of 70 ug/L and the commercial and residential VISLs of 130 and 31 ug/L, respectively.

In 2022, the MoDNR referred the site to the EPA as a remedial site with the potential need for a removal action to address risk to the public wells and possible vapor intrusion. Aramark/Vestis have continued regular groundwater monitoring following the end of MoDNR oversight.

5. NPL Status

The site is not listed on the National Priorities List. The site qualifies to be placed on the National Priorities List based on the Hazard Ranking System (HRS) score. A HRS Documentation Package has been prepared, the Governor of Missouri has been briefed on the site and been given a letter of support from the Director of the MoDNR, which supports proposing the site to the National Priorities List.

6. Maps, pictures and other graphic representations

Maps of the site are included as Attachment 1 including the Site Location Map, Site Layout Map, Monitoring Well Locations Map, Source Soil Sample Map and the 4-Mile Radius Well Map.

B. <u>Other Actions to Date</u>

1. Previous actions

The site qualifies to be placed on the National Priorities List based on the HRS Score. A HRS Documentation Package has been prepared, the Governor of Missouri has been briefed on the site and been given a letter of support from the Director of the MoDNR, which supports proposing the site to the National Priorities List.

In 2022, Aramark conducted a limited vapor intrusion investigation under EPA's oversight. The limited investigation included sub-slab and indoor air sampling at two BMU buildings at [redacted], and sub-slab sampling at the Aramark/Vestis facility located at 400 North West Street. Vapor intrusion

sampling at the BMU buildings showed that there was one indoor air sample that exceeded the TCE commercial removal management level (RML) of 6 micrograms per cubic meter (ug/m^3). This exceedance was reported as a potential indoor air interference. Vapor intrusion sampling at Aramark/Vestis facility showed that five of nine sub-slab vapor samples exceeded the commercial removal management levels for PCE and/or TCE, 5,800 ug/m^3 and 200 ug/m^3, respectively. The highest sub-slab vapor sample results for PCE were 490,000 ug/m^3 and the highest sub-slab vapor sample results for TCE were 640,000 ug/m^3. Aramark/Vestis has not evaluated indoor air for vapor intrusion at the facility due to the reported potential airborne concentrations of organic vapors from the regular and ongoing processing of reusable shop towels.

In 2024, Vestis completed construction and initiated operation of a soil vapor extraction (SVE) system at the facility located at 400 North West Street. The SVE system includes three shallow extraction wells screened approximately 3 to 8 feet bgs and two deep extraction wells screened approximately 12 to 27 feet bgs. The SVE system is in operation to remove volatile organic compounds, primarily PCE, from subsurface soil below the Vestis building slab and the northeast corner of the site.

2. Current actions

No additional on-site actions have occurred since the construction and operation of the SVE system by Vestis in 2024.

C. State and Local Authorities' Roles

1. State and local actions to date

The MoDNR Public Drinking Water Branch referred the site to the MoDNR Superfund Section in 2007 following detections of volatile organic compounds in quarterly monitoring reports. The MoDNR Superfund Section completed a Pre-CERCLIS Site Screening Report in 2010, a Preliminary Assessment Report in 2013, a site Inspection Report in 2017, and oversight of remedial investigation work conducted by Aramark from 2016 and 2022. In 2022, the MoDNR referred the site to the EPA as a remedial site with the potential need for a Removal Action to address risk to the public wells and possible vapor intrusion. Additional details on MoDNR actions are listed in Section A-4.

2. Potential for continued state/local response

On June 30, 2022, the MoDNR referred the site to the EPA. The EPA will coordinate with the MoDNR regarding this Removal Action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Section 300.415(b) of the National Oil and Hazardous Solutions Pollution Contingency Plan (NCP) provides that the EPA may conduct a removal action when it determines that there is a threat to human health or welfare, or the environment based on one or more of the eight factors listed in section 300.415(b)(2). The factors that justify a removal action at the site are outlined as follows:

300.415(b)(2)(i) -- Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants.

Aramark/Vestis sampling have identified a plume of contaminated groundwater that has impacted two public drinking water wells and poses a potential exposure to occupants of nearby structures via vapor intrusion. The contaminated groundwater plume has been found to contain PCE concentrations as high as 1,130 ug/L exceeding the MCL of 5 ug/L and the commercial and residential VISLs of 31 ug/L and 7 ug/L, respectively; TCE concentrations as high as 112 ug/L exceeding the MCL of 5 ug/L and commercial and residential VISLs of 1.9 and 0.62 ug/L, respectively; and cis-1,2-DCE concentrations as high as 310 ug/L exceeding the MCL of 70 ug/L and the commercial and residential VISLs of 130 and 31 ug/L, respectively.

Sub-slab vapor sampling conducted at the Vestis facility identified PCE and TCE concentrations as high as 490,000 ug/m^3 and 640,000 ug/m^3, respectively, exceeding the EPA commercial sub-slab RML of 5,800 ug/m^3 and 200 ug/m^3, respectively.

300.415(b)(2)(ii) – Actual or potential contamination of drinking water supplies or sensitive ecosystems.

Since 2006, PCE, TCE and cis-1,2-DCE have been detected in groundwater samples collected from public drinking water Well #8. PCE concentrations in Well #8 exceeded the MCL of 5.0 ug/L on two occasions in 2009. PCE was detected in public drinking water Well #13 in April and October of 2021. The BMU Water Treatment Plant #3 blends and treats water from Well #8 and Well #13 to serve the city of Sikeston. PCE and PCE-breakdown products TCE and cis-1,2-DCE were detected in treated water from Plant #3 beginning in 2021, and have been identified in treated water at concentrations as high as 1.14 ug/L PCE, 1.45 ug/L TCE and 0.58 ug/L cis-1,2-DCE. The city of Sikeston Public Water System serves a population of 17,615. Water Treatment Plant #3 serves approximately one quarter of the service population.

300.415(b)(2)(vii) – The availability of other appropriate federal or state response mechanisms to respond to the release.

No other appropriate federal or state response mechanisms are known to be available. As discussed above, this site was referred to the EPA by the MoDNR on June 30, 2022.

IV. ENDANGERMENT DETERMINATION

The actual release of hazardous substances at the site, if not addressed by implementing the removal action selected in this Enforcement Action Memorandum, presents an immediate and substantial endangerment to public health, or welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

Actions to be taken by the PRPs are detailed in Section VIII Performance of the Work of the ASAOC that has been negotiated between the PRP and the EPA. Additionally, the PRPs are required to provide a work plan that will outline the specific actions to be taken to satisfy the requirements of the ASAOC. These actions will include developing and implementing, but are not necessarily limited to, a Health and Safety Plan, a Drinking Water Exposure Mitigation Plan, a Sampling and Analysis Plan with Field Sampling and Quality Assurance Project Plans to delineate the groundwater contamination and evaluate vapor intrusion, a Vapor Intrusion Mitigation and Maintenance Plan, and identification and implementation of Institutional Controls.

2. Contribution to remedial performance

Based upon the currently available information, the removal action proposed in this Enforcement Action Memorandum will not impede any future remedial performance.

3. Applicable or Relevant and Appropriate Requirements (ARARs)

Section 300.415(j) of the NCP provides that Removal Actions shall, to the extent practicable considering the exigencies of the situation, attain ARARs under federal environmental or state environmental facility siting laws. The following specific ARARs have been identified for this action:

Federal

- 40 C.F.R. Part 141: Safe Drinking Water Act.
- 40 C.F.R. Part 50: National Primary and Secondary Ambient Air Quality Standards (NAAQS)
- 40 C.F.R. Part 61: National Emission Standards for Hazardous Air Pollutants (NESHAP)

- 40 C.F.R. Part 122: The National Pollutant Discharge Elimination System (NPDES)
- 40 C.F.R. Parts 239-259: Resource Conservation and Recovery Act (RCRA), Solid Waste
- 40 C.F.R. Parts 260-273: RCRA, Hazardous Waste
- 40 C.F.R. Part 300, Section 440: Off-Site Rule
- 49 C.F.R. Parts 107, 171-177: Hazardous Materials Transportation Act

State

By letter dated November 27, 2024, a written request for state ARARs was sent to the MoDNR. Potential ARARs received by the EPA from the MoDNR will be considered in accordance with 40 C.F.R. §300.400(g).

4. Project schedule

This Removal Action is expected to begin in March, 2025. It is anticipated that all activities required in this decision document will be completed in December, 2025.

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

Delayed action will result in a continued threat to public health or welfare or the environment.

VIII. OUTSTANDING POLICY ISSUES

None.

IX. ENFORCEMENT

On November 25, 2025, an ASAOC was executed between the EPA and the PRP. The EPA anticipates the PRPs will conduct removal activities consistent with this Action Memorandum under the ASAOC.

Because of the enforcement-led nature of the proposed action, a separate Enforcement Addendum is not required.

X. RECOMMENDATION

This decision document represents the selected Removal Action for addressing the hazardous substances, pollutants or contaminants present at the site. The Removal Action was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site.

Conditions at the site meet NCP section 300.415(b)(2) criteria for a Removal Action, and I recommend your approval.

Approved:

ROBERT JURGENS Digitally signed by ROBERT JURGENS Date: 2024.12.18 11:16:25 -06'00'

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Robert D. Jurgens, Director
Superfund and Emergency Management Division

Disapproved:

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Robert D. Jurgens, Director
Superfund and Emergency Management Division

Attachments: Figure 1 - Site Overview Map
Figure 2 - Site Layout Map
Figure 3 - Monitoring Well Locations Map
Figure 4 - Source Soil Sample Map
Figure 5 - 4-Mile Radius Well Map