



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

September 19, 2014

Mr. Adam Keyser
Preferred Development
141 W. Jackson Blvd, Suite 3540
Chicago, IL 60604

Re: Remediation Work Plan Review
Preferred Village Green LLC
929-1035 South 13th Street
Decatur, Indiana
VRP #6100502

Dear Mr. Keyser:

This office has reviewed the project file to determine the status of the Preferred Village Green site in Decatur, Indiana. A remediation work plan (RWP) was submitted in October 2011 and IDEM issued a comment letter on January 12, 2012. A response to those comments was submitted on March 1, 2012. These responses mainly pointed to the need for a discussion between the applicant, the applicant's consultant, and IDEM in relation to the comments. The March 2012 letter does not represent a sufficient response to IDEM's comments. This was communicated during a meeting held on March 12, 2013. Further detail on IDEM's vapor intrusion investigation requirements was requested by the applicant's consultant and a comprehensive response letter was to be submitted. Below is further detail, as requested, for the vapor intrusion investigation at the site, as well as additional comments. A response to these comments, as well as to each comment from the January 2012 comment letter, must be submitted within 60 days of the date of this letter or IDEM will reject the RWP and refer the site to another program. Comments follow.

1. The continued operation of the sub-slab depressurization system (SSDS) for vapor intrusion within the dry cleaning tenant space requires a long-term operation and maintenance plan, in addition to long-term sampling. The IDEM non-rule policy document titled "Vapor Intrusion Remedy Selection and Implementation," available at <http://www.in.gov/idem/4202.htm>, should be utilized to determine the appropriate sampling schedule. Sub-slab concentrations must be assessed to determine the schedule. Sampling guidelines include shutting off the SSDS 30 to 45 days prior to a worst-case sampling event, outlined as the dry summer cooling season and the cold winter heating season within the Remediation Closure Guide (RCG). The system must be re-started prior to the next seasonal worst-case sampling event. Please note that the



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SSDS was not operating during the site visit in August 2014. Continued operation of the system should be monitored to ensure that no completed exposure pathway exists for vapor intrusion.

Depending upon results from the vapor intrusion sampling requested above, additional adjacent tenant spaces may need to be sampled. It was noted during an informal site visit on August 22, 2014, that the tenant space to the north has been divided into two tenant spaces, but appear to share one HVAC system. Both physical spaces may need to be sampled for indoor air and sub-slab vapor intrusion, based on the results of the sampling of the dry cleaning tenant space. Additionally, a crack exists on the northern wall of the dry cleaning tenant space. This may be a preferential pathway to the tenant space to the north, which is a concern if vapor intrusion is a completed pathway at the site.

2. In addition to the deep wells requested in the January 2012 IDEM letter, a shallow down-gradient well is needed at the site. A work plan with proposed locations of all requested wells must be submitted to this office within 45 days of the date of this letter.
3. Due to the lag time since the RWP was submitted and inactivity on the site, all future submittals should compare site data and complete investigation according to the RCG and associated screening levels.
4. Please clarify if tetrachloroethene (PCE) is still used in the dry cleaning process at the site.
5. Ground water sampling at the site should be completed utilizing low-flow sampling methods as outlined in the IDEM non-rule policy titled "The Micro-Purge Sampling Option," available at http://www.in.gov/idem/files/remediation_tech_guidance_micro-purge.pdf.
6. Detailed design specifications of the SSDS should be submitted to this office.
7. Further detail should be provided on site figures including sewer laterals to the building, any interior drains, bathrooms, office areas, et cetera, as well as overhead utilities near the dry cleaning tenant space and any storm sewer drains east of the building.
8. It appears that the depiction of MW-2 on site figures may be south of the actual location. The location of MW-5 also appears to be depicted east of the actual location. Please confirm these monitoring well locations.
9. Please provide detail on the stick-up ports within the dry cleaning tenant space located south of the machine and north of B-7. Additionally, please clarify if the additional hole in the concrete floor near B-8 relates to investigation for this site.
10. The community relations plan should be updated to indicate that all tenant spaces will be notified of the RWP public notice period with a letter summarizing site conditions and the proposed remedial strategy.

The requested work plan outlined in Comment #2 must be submitted within 45 days of the date of this letter. Additionally, full responses to the above comments and the January 2012 comment letter must be received within 60 days of the date of this letter. If you have any questions, please contact Corey Webb at (317) 234-0966, (800) 451-6027, or at cwebb@idem.in.gov.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Kuhn".

Kelly Kuhn, Project Manager
Voluntary Remediation Program
Office of Land Quality

Cc: Mr. Robert Mankowski, EPI, 16650 South Canal, South Holland, IL 60473

