State Form 4336

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
INDIANAPOLIS

OFFICE MEMORANDUM

Date: 5-26-20

To: Emily Kauffman
VRP Section

Thru: Steve Buckel 5/26/20

From: Hope Wright HW 5-26-20
Chemistry Services Section

Subject: Summary Report: Responses to IDEM's Prior Correspondence and Results of Additional Assessment Activities, dated 5-1-20
Electric Works
Fort Wayne, Allen Co., Indiana
Site # 6180801
VFC # 82966484

The Summary Report, prepared by Hull & Associates and received by Chemistry Services on 5-11-20, has been evaluated as requested.

Comments

1. The responses to Chemistry comments #1, #2, #4, #5, #6, and #8 were acceptable. Table 1 was provided in response to Comment #5 to clarify sampling details of historical events up to 2016. Historical results from Table 1 can be used for delineation. However, some previous reports did not provide all the needed sampling and/or laboratory information. Therefore, any results used for delineation should be supported with documented field sampling details and/or field sheets and provide the laboratory reports. Future reports should provide sampling details and descriptions (for each matrix) for the current investigation and provide the laboratory reports for the samples.

2. In March and April 2020, five additional monitoring wells (2 for East Campus – EMW-18 and EMW-19 and 3 for West Campus – MW-123 to MW-125) were installed down to 24 ft bgs for further delineation. (See Figure 2 for locations) Groundwater samples were collected from the entire monitoring well network from both Campuses. The existing and newly installed wells were sampled using the low-flow methodology except MW-4 was sampled using the bailer method. Groundwater samples from the East Campus were analyzed for VOCs (Method 8260), SVOCs (Method 8270), and RCRA metals both total and dissolved (Method 6010 and 7471). Groundwater samples from the West Campus were only analyzed for VOCs (Method 8260). In addition, VI sampling was conducted in the West Campus buildings from

previous VI sampling locations. Paired SGss /IA samples were collected from buildings – 19, 20, 21, 22, 23, 25, 26, 27, 31, and 36. SGss/IA/AA samples were collected using 6-L summa canisters over an 8-hr period. SGss sample lines were purged before sampling. The IA Building checklists were completed for each building. The canister pressures were good. The VI samples were analyzed for VOCs by EPA Method TO-15. The sampling procedures and analytical methods were acceptable.

3. Several monitoring well results in both areas (West and East Campus areas) exceeded the RCG GWSLs for one or more of TCE, cis-DCE, and VC. The highest TCE results from West Campus were MW-8 (239 ppb) and MW-120 (218 ppb). Also, TCE results at MW-2R, MW-12, MW-13, MW-102, MW-109, and MW-121 exceeded the RCG CVIGWSL from West Campus area. The highest TCE results at EMW-3 (111 ppb) and EMW-4 (66.1 ppb) exceeded the RCG CVIGWSL from the East Campus area. The groundwater results are summarized in Tables 3 and 4 of the report.

4. Most of the total metal results were less than the RCG GWSLs for the East Campus area. Only a few arsenic and lead results exceeded the RCG GWSL. However, all the dissolved metal results were less than the RCG GWSLs. Therefore, based on the results, metals do not appear to be a site issue. Metals can be dropped from the site parameter list for East Campus area. The groundwater results are summarized in Table 5 of the report.

5. All the SVOCs results were less than the RCG GWSLs for East Campus area. The SVOCs can be dropped from the site parameter list for East Campus area. The groundwater results are summarized in Table 6 of the report.

6. All of the winter 2020 IA/AA results were less than the RCG RIASLs. However, many TCE SGss results at B20-VP2, B20-VP3, B22-VP-1, B26-VP12, B26-VP13, B26-VP14 and B27-VP15 exceeded the RCG CSGSL. This was the second VI sampling event from the West Campus buildings. Based on the VI results, vapor mitigation systems (VMS) are planned be installed in buildings – 20, 22, 24, 26, and 27 at the West Campus area. This proposal seems acceptable. Chemistry refers this evaluation to the Risk Services Section.

7. The owner wants site characterization approval for the West Campus while additional assessment may be needed for the East Campus. The current CSM is to preserve, restore, and repurpose the existing buildings on the West Campus for commercial land use. Possible exceptions are potential recreational use for a portion of Building 36 and potential educational use for Building 31. Any residential land use of remaining space on West Campus would be dedicated to upper floors of certain buildings where COCs are mitigated by VMS and/or ERC measures. An RWP is being developed to include soil and groundwater management plan, ERC to restrict groundwater usage, VMS to be installed, and re-evaluate the ERC for Building 36. Chemistry refers these evaluations and proposals to the Geological and Risk Services Sections.

8. The elements of the Minimum Data Documentation Requirements were met for the 2020 sampling events. The laboratory reporting limits were supportive of the RCG SLs. Once the Geological Services Section determines that the groundwater contamination is defined, then full QA/QC documentation from the most recent monitoring well sampling event should be submitted for data validation. Full QA/QC requirements may be found in Section 3 of the Remediation Closure Guide on the IDEM website at http://www.in.gov/idem/cleanups/files/remediation_closure_guide.pdf.

cc: Stephanie Redick, Risk Services
Will Foster, Geological Services