



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb  
Governor

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Commissioner

June 20, 2023

Josh Parker and Jeff Kingsbury  
Broadway Redevelopment Partners, LLC  
RTM Ventures, LLC  
EW West Campus Landlord, LLC  
701 W. Main Street, Suite 200  
Durham, NC 27701

\*Transmitted via Email\*

Re: Groundwater Monitoring Well Network and Sampling Plan Update & Groundwater Monitoring Report – October 2021, March 2022, and July 2022 Monitoring Events; Electric Works (Former General Electric) West Campus, Fort Wayne, Indiana; CSP001.300.0071  
Electric Works  
1701 College Street  
Fort Wayne, IN 46802  
VRP # 6180801

Dear Mr. Parker and Mr. Kingsbury:

The Indiana Department of Environmental Management (IDEM) has reviewed the Groundwater Monitoring Well Network and Sampling Plan Update and the Groundwater Monitoring Report – October 2021, March 2022, and July 2022 Monitoring Events; Electric Works (Former General Electric) West Campus, Fort Wayne, Indiana; CSP001.300.0071 (prepared by Verdantas, LLC [Verdantas], May 3, 2023) for the Electric Works site located at 1701 College Street in Fort Wayne, Indiana.

The reports were uploaded to the IDEM Virtual File Cabinet (VFC) as document # 83470743 (Sampling Plan) and document # 83470671 (Monitoring Report). Further site history can be found in the VFC located on the IDEM website [vfc.idem.in.gov](http://vfc.idem.in.gov). This technical letter contains a brief background summary including comments generated during our review of the above-mentioned report.

## Background

The former General Electric (GE) campus is comprised of two separate sites. The East Broadway Campus is 20 acres and includes former railroad property. The West Campus, which is the subject of this review, is 23 acres. The two properties are bisected by Broadway Avenue. The entire campus was developed for industrial use in the late 1800s and was purchased by GE in 1885 for use as a motor and electrical transformer manufacturing facility. Only 7 buildings of the original 31 remain. Many were deconstructed and replaced with larger buildings.

Manufacturing operations ceased in 2015; the site is currently undergoing redevelopment as a large mixed-use complex incorporating commercial space, medical facilities, retail use, an educational building, parking, and greenspace. Previous environmental work at the site was associated with Resource Conservation and Recovery Act (RCRA) activities for a former drum



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storage area on the West Campus, as well as Phase II Environmental Site Assessment activities on both the East and West Campuses.

New owners (RTM Ventures and Broadway Redevelopment Partners [BRP]) purchased the property from GE in 2017. The site was accepted into the Voluntary Remediation Program (VRP) in March 2019. Remediation objectives established in the approved Remediation Work Plan (RWP) are Remediation Closure Guide (RCG) Screening Levels (SL). Contaminants of Concern (COCs) include volatile organic compounds (VOCs) and RCRA metals.

The Groundwater Well Network and Sampling Plan Update notes that multiple wells are inaccessible or destroyed due to redevelopment activities at the site. Verdantas proposes to replace key monitoring well locations and conduct quarterly sampling for at least six quarters. The Groundwater Monitoring Report outlines results for mobilizations in October 2021, March 2022, and July 2022. Data gaps exist due to the unavailable wells. Verdantas proposed to address the data gaps with further monitoring. Comments generated during the review of these reports are summarized below.

#### Comments

##### **Groundwater Monitoring Well Network and Sampling Plan Update**

1. The proposed replacement wells appear sufficient to account for the data gaps created by the missing wells. The conceptual site model must be evaluated following the initial groundwater monitoring event to confirm the network is sufficient. Pending future sampling results, additional well installations may be required.
2. Verdantas requested IDEM concurrence that further deep monitoring well groundwater sampling is not required. Per the approved RWP Section 2.1, "As presented above in Section 1.2.2, IDEM has concurred that deeper groundwater has been adequately delineated vertically, provided that the deeper aquifer is monitored on a quarterly basis." Monitoring well MW-127D has been sampled for five sampling events. Monitoring well MW-126D has been sampled for two sampling events. Based on the line of evidence that two detections have occurred and only in monitoring well MW-127D, it is acceptable to not replace these destroyed wells. Vertical delineation is complete.

##### **Groundwater Monitoring Report – October 2021, March 2022, and July 2022 Monitoring Events**

1. Dehalococcoides (Dhc) data showed the presence of gene copies per milliliter of sample which may be supportive of dechlorination processes. However, Dhc data must be reported in cells per milliliter so that the Dhc colony threshold level of 10,000 cells per milliliter for effective remediation may be utilized for sample comparisons.
2. Field data was included in Attachment A and the drawdown and stabilization measurements were in-control except for some of the turbidity measurements. However, since all of the other stabilization measurements were in-control, the data was not affected.

Verdantas must submit groundwater monitoring reports 60 days after completing sampling. Verdantas must notify IDEM prior to conducting field work. If you have any questions, please contact me at (317) 232-8517, (800) 451-6027, or at [CNDay@idem.in.gov](mailto:CNDay@idem.in.gov).

Sincerely,



Chelsea Day,  
Project Manager  
Voluntary Remediation Program  
Office of Land Quality

cc: Valerie Gill, Verdantas; [VGill@verdantas.com](mailto:VGill@verdantas.com)  
Philip Storch, Ancora; [PStorch@ancora.re](mailto:PStorch@ancora.re)  
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*It is the goal of IDEM to enable remediation sites to move forward in a timely manner. If an impasse has been reached over technical issues, a Technical Review Panel of non OLQ scientists is available to review and offer a non-binding opinion to help resolve technical disagreements with the VRP and State Cleanup Program project managers. The goal is to facilitate progress at your site. This review process is available immediately. If you would like to request a review by the Panel, please contact Kevin Davis, Remediation Services Branch Chief for the Office of Land Quality, at 317-232-4535 or [kdavis2@idem.in.gov](mailto:kdavis2@idem.in.gov).*

*Any decision produced by the Technical Review Panel is not an agency action as defined in IC § 4-21.5-1-4 or an order as defined in IC §4-21.5-1-9. This decision is not subject to administrative review because it is not a determination of any legal rights, duties, privileges, immunities, or other legal interests, and because it is issued pursuant to an informal procedure for dispute resolution as allowed by IC 4-21.5-3-34 (a).*