
From: STILZ, DON
Sent: Thursday, January 25, 2024 1:27 PM
To: anthony.carmeli@L3Harris.com; jeffpalermoconstruction@gmail.com
Cc: Vince.Ruark@L3Harris.com; Bryan, Jeffrey; Cisneros, Jose; Pitcher, Chad A; Robinson, Bill; Surfus, Jeff; O'Brien, Debra L; OAKES, GLYNDA
Subject: Former ITT Aerospace
Attachments: Notice of Corrective Action Required.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Gentlemen:

Please see the attached letter regarding IDEM's request to complete corrective action activities for the former ITT Aerospace facility in Fort Wayne, Indiana.

For questions related to this request, please contact Ms. Debbie O'Brien at dobrien@idem.IN.gov, or at 317-234-0162.

Thank you for giving this matter your immediate attention.

Donald Stilz



Donald Stilz
Chief | Hazardous Waste Permit Section
Permits Branch | Office of Land Quality
Indiana Department of Environmental Management

(317) 232-3409 | dstilz@idem.IN.gov





INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Commissioner

VIA ELECTRONIC SERVICE

January 25, 2024

Mr. Anthony Carmeli
L3Harris Technologies, Inc.
1025 West NASA Boulevard, Mail Stop A-11D
Melbourne, Florida 32919

Mr. Jeff Palermo
Palermo Real Estate Holdings LLC
419 E. Till Road
Fort Wayne, IN 46825

RE: Notice of RCRA Subtitle C Corrective Action Required
Former ITT Aerospace Facility
3700 E. Pontiac Street
U.S. EPA ID No. IND005420245
Fort Wayne, Allen County, Indiana

Dear Mr. Carmeli and Mr. Palermo:

The Indiana Department of Environmental Management (IDEM) is authorized to implement the requirements of the Resource Conservation and Recovery Act (RCRA) in Indiana on behalf of the United States Environmental Protection Agency (EPA). IDEM and EPA have the responsibility of ensuring that RCRA Corrective Action is implemented at all active and former RCRA treatment, storage, or disposal (TSD) facilities in Indiana.

Pursuant to Section 3010 of RCRA, (42 United States Code (U. S. C.) § 6930), ITT Aerospace/Optical Division (ITT) notified the EPA on March 11, 1982 (VFC# [80070783](#)), of its hazardous waste activity, and was assigned the EPA I.D. IND005420245. ITT identified itself as a container (S01) and tank (S02) storage facility. In its Part A application, dated March 11, 1982, ITT listed the following hazardous waste storage: D001, D002, D008, F001, F002, F007, F009, F011, and K054.

The facility requested the removal of Interim Status due to changes in its waste management activities on April 1, 1985, and was granted closure of the tanks and drum storage areas on August 11, 1986 (VFC# [80070771](#)).



Visit on.IN.gov/survey or scan the QR code to provide feedback.

We appreciate your input!



Mr. Carmeli
Mr. Palermo
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Remediation activities at the facility started in 1988 when the removal of an acid aboveground storage tank revealed soil contaminated with TCE. Contaminated soil from the excavation was staged on site in a waste pile, resulting in an enforcement action in 1991. Closure of the waste pile area was approved on November 19, 1997 (VFC# [62599170](#)). However, site-wide Corrective Action obligations remained to be completed.

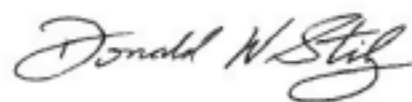
The completion of the facility's Corrective Action obligations is being tracked under the Government Performance and Results Act (GPRA) of 1993 after EPA listed the facility on the GPRA Baseline List. Inclusion on this list means that both EPA's and IDEM's Corrective Action programs are evaluating whether cleanup activities have resulted in the satisfactory protection of human health, contaminated groundwater migration is controlled, and all Corrective Action performance standards have been attained. These milestones are referred to as Environmental Indicators (EIs).

The most recent document in IDEM's Virtual File Cabinet pertaining to cleanup efforts at this site is the Remediation Completion Report (RCR) that L3Harris submitted on December 10, 2021 ([83252572](#)). IDEM's review of the RCR identified data gaps pertaining to vapor intrusion and contaminated groundwater delineation. For as long as these gaps remain, the EIs cannot be completed, bringing this facility to EPA Headquarters' attention.

IDEM's Corrective Action Program is providing you with the enclosed comments that if satisfactorily addressed will result in the attainment of each of the three remaining EIs. EPA and IDEM encourage you to perform these activities voluntarily. Failure to take that step may result in an enforcement action, either by EPA or IDEM, against the owner and/or operator to ensure human health is protected and contaminated groundwater is under control.

Please contact Ms. Debbie O'Brien at (317) 234-0162, or dobrien@idem.IN.gov, within 15 days notifying her of your intentions to comply with this request.

Sincerely,



Donald W. Stilz, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

Enclosure

cc: Vince Ruark, L3 Harris (w/ enclosure)
Jeff Bryan, AECOM (w/ enclosure)
Joe Cisneros, EPA Region 5 (w/ enclosure)
Chad Pitcher, IDEM – VRP (w/ enclosure)
Bill Robinson, IDEM – Geology (w/ enclosure)
Jeff Surfus, IDEM – Risk Services (w/ enclosure)

**Former ITT Aerospace Facility
3700 E. Pontiac Street
U.S. EPA ID No. IND005420245**

1. Although the spatio-temporal plume analysis used in the RCR indicates the overall volatile organic compound (VOC) mass of the plume is stable or decreasing, that analysis is based on approximations of plume area, mass, and center of mass with varying degrees of statistical confidence for each VOC constituent. At the site-wide scale, the spatio-temporal analysis appears to provide adequate assurance that the VOC plume is under control with respect to human exposures to contamination and migration of contaminated groundwater. However, the RCR also indicates the VOC plume extends to the southeast property boundary at concentrations exceeding the residential screening levels for trichloroethene (TCE) and vinyl chloride. This implies that nearby off-site properties, such as Pro Tow Garage, are at risk through the groundwater exposure pathway, and possibly the vapor intrusion exposure pathway.

Considering the potential exposure risk to off-site properties just beyond the eastern property boundary, and in line with the VOC plume axis and apparent plume trajectory, it is warranted to acquire additional data near the off-site property in the apparent path of the VOC plume. To address this data gap, the facility needs to conduct at least one additional soil boring either between the property boundary and the west side of the off-site property labeled in the RCR as Pro Tow Garage, or as close as possible to the east side of the building if inaccessible on the west side. The boring(s) will need to be continuously logged to a depth corresponding to the bottom of Unit B2 and include collection of groundwater samples from each water-bearing zone encountered beneath ground surface (i.e., Unit A, Unit B2). Please submit a work plan to IDEM for review and approval.

At the conclusion of the additional boring(s) and groundwater sampling, the facility will need to submit a report of findings, including hydrogeologic cross sections oriented to the axis of the VOC plume and transverse to the plume axis, through the location of the off-site investigation.

Depending on the findings of the additional off-site investigation, the facility may need to consider additional monitoring and/or alternative remediation options to ensure the VOC plume is under control with respect to human exposures to contamination and migration of contaminated groundwater.

2. Verification of the lack of a complete vapor intrusion (VI) pathway is required. IDEM recommends collecting exterior soil gas samples along the eastern site boundary, just west of the structure at 2701 Coliseum Blvd South. Please submit a work plan to IDEM for review and approval.
3. Given the presence of TCE under the site at up to 9,630 ug/l, regardless of the depth, either additional remediation is needed or an environmental restrictive covenant (ERC), with appropriate VI restrictions, must be recorded. If ITT chooses to address the VI potential through an ERC, please submit a draft ERC for IDEM's approval.