

From: [McClure, Linda \(IDEM\)](#)
To: [Amy Romig; Thill, Stephen D](#)
Cc: [Erik Mroz; Brett Nelson; RITCHOTTE, GEORGE](#)
Subject: All Pro Scrap: IDEM Comments on Additional PCB Sampling
Date: Tuesday, March 12, 2024 9:51:00 AM
Attachments: [image001.png](#)
[image002.png](#)

Hi Amy,

IDEM has completed its review of the additional PCB sampling locations as specified in the email below. This email is viewed as an 2nd amendment to the Remedy Work Plan, dated February 17, 2020 [VFC# 82936707] and approved on August 3, 2021. The 1st amendment being the Remedy Work Plan Amendment, dated February 14, 2023 [VFC# 83463318].

IDEM provides the following comments:

1. Please provide a clarification of the anticipated change in cap size - If the cap is allowed to be reduced, per sample results, does this mean the cap size will cover all exceedances in the original and new sample areas only, instead of covering the entire site?
2. What is the timeline for the sampling event?
3. IDEM does not object to the idea of All Pro Scrap conducting additional sampling to further delineate the extent of the PCB contamination, but please be advised that the historical analytical information would still be considered in any final decision.
4. IDEM would not object to the reduction of the cap dimensions if the new delineation information demonstrates a smaller area of concern.
5. Another option available is to remove the PCB impacted soils down to lesser concentration, such as 1 ppm where a cap would no longer be necessary to be protective of human health and the environment.

Please provide a response to Items 1 and 2 above no later than 3/29/24.

Please contact me with further questions, thank you.



Linda McClure
Senior Environmental Manager
Office of Land Quality | Enforcement Section
Indiana Department of Environmental
Management
317.233.5954 | lmccclure@idem.in.gov

From: Amy Romig <aromig@psrb.com>
Sent: Tuesday, March 5, 2024 2:30 PM
To: Thill, Stephen D <SThill@idem.IN.gov>
Cc: McClure, Linda (IDEM) <lmccclure@idem.IN.gov>; Erik Mroz <emroz@dsylaw.com>; Brett Nelson <bnelson@psrb.com>
Subject: RE: All Pro Scrap

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Stephen and Linda:

All Pro Scrap will have Keramida complete the following sampling protocol which proposes to take an additional 40 borings outside of the area already sampled as follows:

KERAMIDA will divide the site into 40 even grids, each approximately 1,650 square feet in size. The grid will be outside the boundary of the previously excavated area and borings with analytical results below Risk-based Closure Guide (R2) Long Term Commercial PLs. One boring will be advanced in each grid. Given the presence of compacted gravel at the Site, soil borings will be completed using direct-push technology (DPT). The exact boring locations will be selected in the field based on Site conditions. The borings will be advanced to a maximum depth of 2 feet below ground surface (bgs).

KERAMIDA will continuously collect soil samples from the borings. KERAMIDA will visually inspect the soil for signs of contamination and the lithology will be recorded. A photoionization detector (PID) will also be used to screen the soil samples for indications of contamination.

KERAMIDA will collect soil samples in accordance with Table 1: Proposed Soil Delineation Sampling & Analysis Plan (SAP), below. The samples will be logged on a chain-of-custody form and submitted to a qualified laboratory for analysis. Table 1 summarizes the rationale for the boring locations, the associated soil sampling, and lab analyses. Duplicate soil samples and matrix spike/matrix spike duplicate samples will be collected at a rate of one per 20 samples and trip blanks will be included in the sample shipments for quality assurance/quality control (QA/QC) purposes.

The drill cuttings will be placed back into the boreholes.

Once all analytical results have been received and reviewed, KERAMIDA will prepare a report documenting the Soil Delineation activities. The report will include Site figures, description of field activities, boring log diagrams, discussion of the analytical results, determination of representative concentrations, conclusions, and recommendations.

Table 1
Proposed Soil Delineation Sampling & Analysis Plan
All Pro Scrap, Inc., 1905 Lawton Avenue, Indianapolis, Indiana

Number of Borings	Location Rationale	Method	Anticipated Depth (ft)	Soil		
				Sample Depth (ft)	Sampling Rationale	Lab Analyses
40	Grid Sampling – Site Divided into 40 Even Grids Approximately 1,650 SF Each	DPT	2	0-1	Field Observations	VOCs, PAHs, PCBs, & Metals
				1-2		

Footnotes

DPT = Direct Push Technology

ft = Feet

SF = Square Feet

Laboratory Analyses

Arsenic & Lead; U.S. EPA SW846 Method 6010

Metals = Eight RCRA Metals (Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium & Silver); U.S. EPA SW846 Methods 6010/7470

PAHs = Polynuclear Aromatic Hydrocarbons U.S. EPA SW846 Method 8270

PCBs = Polychlorinated Biphenyls; U.S. EPA SW846 Method 8082

VOC = Volatile Organic Compounds; U.S. EPA SW846 Method 8260B for Soil/GW (Preparation Method 5035A for Soil)

Please let us know if this is acceptable to IDEM, and thank you.

Amy

Amy Romig
Partner
Plews Shadley Racher & Braun LLP

From: Thill, Stephen D <SThill@idem.IN.gov>
Sent: Tuesday, February 27, 2024 10:37 AM
To: Amy Romig <aromig@psrb.com>
Cc: McClure, Linda (IDEM) <lmcclure@idem.IN.gov>
Subject: RE: All Pro Scrap

Hi Amy,

Can you please provide an update on the proposed sampling plan we discussed a couple weeks ago?

Thanks,
Steve

From: McClure, Linda (IDEM) <lmcclure@idem.IN.gov>
Sent: Tuesday, February 13, 2024 1:47 PM
To: Amy Romig <aromig@psrb.com>
Cc: Thill, Stephen D <SThill@idem.IN.gov>
Subject: FW: All Pro Scrap

Here it is.

Linda McClure
IDEM | OLQ Enforcement
317.233.5954
lmccclure@idem.in.gov

From: Sara G. Guss <sguss@ke ramida.com>
Sent: Tuesday, November 28, 2023 4:58 PM
To: McClure, Linda |IDEM| <lmccclure@idem.IN.gov>
Cc: RITCHOTTE, GEDRGE <G.RITCHOT@idem.IN.gov>
Subject: RE: All Pro Scrap

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Good afternoon, Linda. Thank you, hope you had a good holiday. We provided some additional information regarding costs. Waiting to hear back regarding next steps and schedule. Thank you.

From: McClure, Linda |IDEM| <lmccclure@idem.IN.gov>
Sent: Monday, November 27, 2023 2:46 PM
To: Sara G. Guss <sguss@ke ramida.com>
Cc: RITCHOTTE, GEDRGE <G.RITCHOT@idem.IN.gov>
Subject: RE: All Pro Scrap

Hi Sara,

I hope you had a nice Thanksgiving!

Going through my checklist - Are you able to provide a rough estimate for the cap installation?

Thanks,

Linda McClure
IDEM | OLQ Enforcement
317.233.5954
lmccclure@idem.in.gov

From: Sara G. Guss <sguss@ke ramida.com>
Sent: Thursday, October 19, 2023 2:34 PM
To: McClure, Linda |IDEM| <lmccclure@idem.IN.gov>
Subject: RE: All Pro Scrap

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Linda - I am not sure at this point. I may know more next week. Have a good weekend.
Sara

From: McClure, Linda |IDEM| <lmccclure@idem.IN.gov>
Sent: Thursday, October 19, 2023 12:34 PM
To: Sara G. Guss <sguss@ke ramida.com>
Subject: RE: All Pro Scrap

Thanks Sara for the update. Do you have an estimate on when you think the cap will be installed. I understand that it is hard to estimate.

Linda McClure
IDEM | OLQ Enforcement
317.233.5954
lmccclure@idem.in.gov

From: Sara G. Guss <sguss@ke ramida.com>
Sent: Thursday, October 19, 2023 10:06 AM

To: McClure, Linda | IDEM | <lmccclure@idem.IN.gov>
Subject: RE: All Pro Scrap

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Linda – no, the cap has not been completed. The stormwater design has not been completed or approved.
Sara

From: McClure, Linda | IDEM | <lmccclure@idem.IN.gov>
Sent: Thursday, October 19, 2023 9:58 AM
To: Sara G. Guss <sguss@keramida.com>
Subject: RE: All Pro Scrap

Hi Sara,

Has the cap been completed?

Thanks,

Linda McClure
IDEM | OLQ Enforcement
317.233.5954
lmccclure@idem.in.gov

From: Sara G. Guss <sguss@keramida.com>
Sent: Thursday, October 19, 2023 7:48 AM
To: McClure, Linda | IDEM | <lmccclure@idem.IN.gov>
Subject: RE: All Pro Scrap

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Good morning, Linda. I meant to respond to your email earlier this week! I got sidetracked after I read it on Monday. I apologize for the delay. We have working through drainage concerns and the associated costs. We need to implement stormwater retention and since the entire site will be covered, difficulty with subsurface storage, and lack of infrastructure nearby, the design options are limited and complicated. We have been working with drainage specialists. Please let me know if you have any questions or if you need any additional information. Thank you.
Sara

From: McClure, Linda | IDEM | <lmccclure@idem.IN.gov>
Sent: Monday, October 16, 2023 1:26 PM
To: Sara G. Guss <sguss@keramida.com>
Subject: All Pro Scrap

Hi Sara,

May I please get an update on All Pro Scrap?

Thanks!



Linda McClure
Senior Environmental Manager
Office of Land Quality | Enforcement Section
Indiana Department of Environmental
Management
317.233.5954 | lmccclure@idem.in.gov