



Anthony J. Carmeli
Director, Environmental Remediation
L3Harris Technologies, Inc., Corporate
1025 W. NASA Blvd., MS A-11D
Melbourne, FL 32919
t 720.249.7404

April 25, 2024

Donald W. Stilz, Chief
Hazardous Waste Permit Section
Permits Branch, Office of Land Quality
Indiana Department of Environmental Management (IDEM)
Via Email only: DSTILZ@idem.IN.gov

RE: Response to 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. Stilz:

L3Harris Technologies, Inc. (L3Harris) received comments from the Indiana Department of Environmental Management (IDEM) via letter dated 25 January 2024 in response to L3Harris' December 10, 2021 ([83252572](#)) Remediation Completion Report (RCR). IDEM's review of the RCR identified certain data gaps pertaining to vapor intrusion and contaminated groundwater delineation at the site referenced above ("site").

On March 14, 2024, L3Harris and IDEM participated in a video conference call to review IDEM's comments (excerpted below) and discuss a path forward to obtain regulatory closure of the site. The IDEM comment is provided in normal font text and the L3Harris response to these comments are provided below in *Italics*.

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."

L3Harris will submit a work plan to address the data gap in the Unit B2 zone identified during the March 14, 2024 meeting. This work plan will be submitted to IDEM for review and will be submitted no later than June 3, 2024.

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."

During the March 14, 2024 meeting, IDEM reiterated concerns about remaining PCE concentrations in groundwater and the need to confirm that remaining PCE in groundwater is not creating a VI issue. L3Harris offered the option of updating/developing an environmental restrictive covenant ("ERC") that addressed potential VI risk on site. IDEM agreed that if an amended ERC addressing VI risk was developed, this would satisfy the requirement to address the VI pathway and the site could proceed to "closure" and no additional soil gas data would be needed. L3Harris will pursue an amended ERC with the site property owner that addresses VI risk.

Please note that during the March 14, 2024 meeting, IDEM verbally confirmed that the reference to "2701 Coliseum Blvd South" in IDEM's comment above is erroneous and the intended property address is "3838 E. Pontiac Street."

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."

L3Harris will submit a draft amended ERC for the site with appropriate VI restrictions to IDEM for review with the investigative report related to item 1 above.

Sincerely

Anthony J. Carmeli

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Director, Environmental Remediation

cc: Vince Ruark, L3Harris
Jeff Bryan, AECOM
Joe Cisneros, EPA Region 5
Chad Pitcher, IDEM – VRP
Bill Robinson, IDEM – Geology
Jeff Surfus, IDEM – Risk Services
William Holland IDEM – Voluntary Cleanup Program
Mr. Jeff Palermo, Palermo Real Estate Holdings LLC

