

COUNTY RECORDER'S STAMP

**Indiana Department
of Environmental Management**

Certificate of Completion



**Voluntary Remediation Program
Twigg Corporation**

Martinsville, Indiana

VRP Project #6970506

Indiana Department of Environmental Management



Certificate of Completion

Issued to

Twigg Corporation

FOR The successful completion of the Voluntary Remediation Work Plan for the Twigg Corporation, IDEM #6970506, located at 659 York Street, Martinsville, (Morgan County) Indiana, as more specifically described in the attached Exhibits 1-3, which are incorporated herein by reference. The issuance of a Certificate of Completion under IC 13-25-5 is a final agency action for purposes of IC 4-21.5.

Signed this date May 21, 2024

Brian Wolff, Assistant Commissioner, Office of Land Quality
Department of Environmental Management



A State that Works

Exhibit 1

Project Summary

Exhibit 1

**Project Summary
Certificate of Completion for the Voluntary Remediation Program
Indiana Department of Environmental Management
Twigg Corporation
VRP Site # 6970506**

VRP APPLICANT: Twigg Corporation

APPLICANT ADDRESS: 659 E. York Street

PROJECT NAME: Twigg Corporation

VRP PROJECT ADDRESS: 659 E. York Street

CITY, COUNTY: Martinsville, Morgan

PROJECT MANAGER: Damon Ridley

DATE APPLICATION RECEIVED: May 1997

DATE COMPLETION REPORT APPROVED: January 2024

**DID THE REMEDY ENTAIL ACTIVE / PHYSICAL REMEDIATION OF
CONTAMINATION IN ORDER TO ACHIEVE CLOSURE?:** Yes (see below)

REMEDICATION CLEANUP GOALS ACHIEVED: VRP 1996 Guidance Tier III
nonresidential, nondefault.

MEDIA ADDRESSED: Surface Soil, Subsurface Soil, Groundwater

VRP PROJECT AREA: See Exhibit 3

ENVIRONMENTAL RESTRICTIVE COVENANT (ERC) USE RESTRICTIONS:

The Owner:

- a) Shall not use or allow the use of the Real Estate for residential purposes, including, but not limited to, daily childcare facilities or educational facilities for children (e.g., daycare centers or K-12 schools).
- b) Shall not use or allow the use or extraction of groundwater at the Real Estate for any purpose, including, but not limited to: human or animal consumption, gardening, industrial processes, or agriculture, except that groundwater may be extracted in conjunction with environmental

investigation and/or remediation activities.

- c) Shall not use the Real Estate for any agricultural use.
- d) Shall restore soil disturbed as a result of excavation and construction activities in such a manner that the remaining contaminant concentrations do not present a threat to human health or the environment. This determination shall be made using the Department's current risk-based guidance. Upon the Department's request, the Owner shall provide the Department written evidence (including sampling data) showing the excavated and restored area, and any other area affected by the excavation, does not represent such a threat. Contaminated soils that are excavated must be managed in accordance with all applicable federal and state laws, and disposal of such soils must also be done in accordance with all applicable federal and state laws.

The land-use restrictions above are contained in an ERC recorded on the property. The ERC can be reviewed at the Morgan County Recorder's Office (Document #202304696), or in IDEM's Virtual File Cabinet (VFC) as document #834925321 at the following internet web address: <http://vfc.idem.in.gov/>. The ERC is hereby incorporated by reference into Exhibit 1 of this Certificate of Completion (COC).

ENGINEERING CONTROL(S) TO BE MAINTAINED: None

SUMMARY OF PROJECT:

The Remediation Work Plan (RWP) dated 4-27-2012 (VFC# 65763786) was submitted to the Indiana Department of Environmental Management (IDEM). This RWP included primarily Monitored Natural Attenuation (MNA), termination of the former soil vapor extraction (SVE) activities, and extension of the SVE system to a secondary area on the Twigg site. The primary RWP activities were approved by IDEM in a letter dated November 29, 2012 (VFC# 67094599). There were many subsequent reports that help to support the closure of this site. Three additional Remediation Work Plan Implementation Reports were submitted by the consultant between March 4, 2014, and February 9, 2017. These reports documented annual groundwater sampling of a subset of the Site's monitoring well network, additional private water well sampling, and finally an updated Conceptual Site Model (CSM).

The Site has implemented the following active technologies (Soil Vapor Extraction and Ozone Sparging), evaluation of the fate, transport and attenuation of residual soil and groundwater impacts, and the elimination of potential human exposure pathways to groundwater through the execution of appropriate institutional controls to assure human health is protected now and in the future. Specific remedial efforts have included the

following activities: 1) Extensive site characterization activities including the installation and sampling of soil and groundwater at hundreds of soil boring and monitoring well locations leading up to active remedial activities in 1999/2000. 2) Installation and operation of a Soil Vapor Extraction (SVE) system to remove volatile organic compounds (VOCs) from impacted source zone soils between 1999 and 2010. 3) Installation and operation of an Ozone Sparging system to treat groundwater impacts beneath the VOC source area between 2004 and 2008. 4) Vapor intrusion (VI) investigations at residential and commercial properties near the facility in 2008 and 2009. 5) Technical evaluations confirming the capacity for residual groundwater impacts associated with the Site to attenuate naturally over time, between 2011 and 2017. 6) Multiple rounds of private water well surveys and testing of accessible off-Site private wells in 2013, 2014 and 2021. 7) Additional evaluations of both the vertical and horizontal extents of VOC impacts in groundwater in 2020 to screen for other potential VOC source areas, finalize the characterization of the nature and extent of groundwater impacts, and to further refine the understanding that the "core" of residual groundwater impacts associated with the Site occur significantly below the water table, and do not pose a VI risk. 8) Communications and negotiations with the City of Martinsville regarding the enactment of Environmental Restrictive Ordinance (ERO) to prevent future exposure to residual groundwater impacts via the ingestion/direct contact exposure pathway. The City of Martinsville enacted the ERO that will support closure on September 27, 2021 (VFC# 83230695). The applicant (Twigg Corporation) also supports the closure with a recorded Environmental Restrictive Covenant (ERC) on its parcel dated June 2, 2023 (VFC#834925321).

IDEM staff deemed no additional remedial activities was warranted with the use of the City's ERO and the applicant's ERC that limits contact with the soil and groundwater and the remediation that was completed. Therefore, the site is ready for closure.

This Certificate of Completion is not meant to modify the terms or conditions of the completed Remediation Work Plan and Covenant Not to Sue. In the event this Certificate of Completion should be inconsistent with the Remediation Work Plan or the Covenant Not To Sue, the Remediation Work Plan shall control.

Exhibit 2

Table of Contaminants Addressed in Project

EXHIBIT 2

Twigg Corporation

SITE CONTAMINANTS OF CONCERN ADDRESSED BY REMEDIATION WORK PLAN

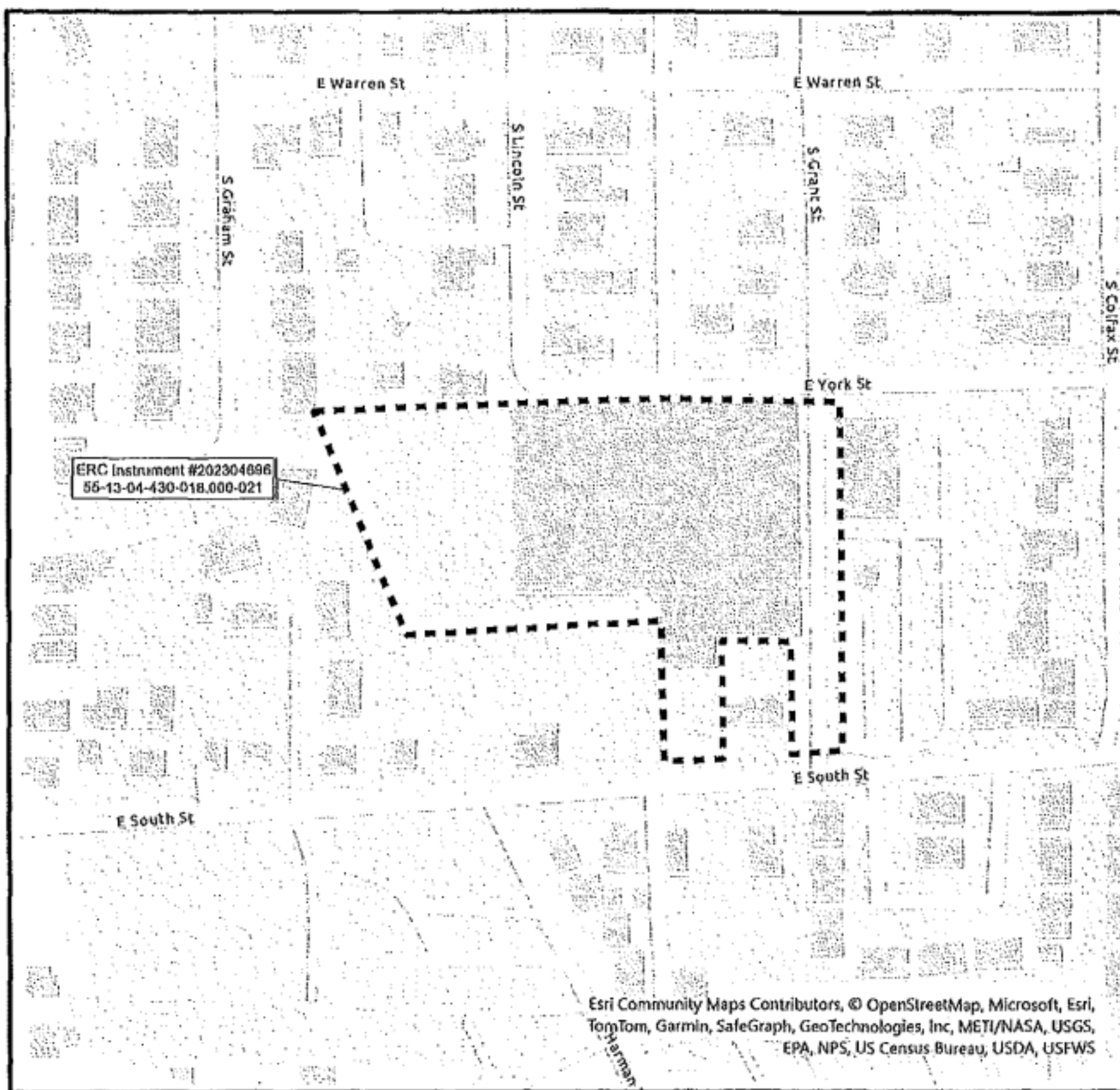
Volatile Organic Compounds	Volatile Organic Compounds	Volatile Organic Compounds
Acetone	1,2-Dichloroethane	1,2,4-Trimethylbenzene
Acrolein	1,1-Dichloroethylene	1,3,5-Trimethylbenzene
Acrylonitrile	1,2-Dichloroethylene, Cis-	Vinyl acetate
Benzene	1,2-Dichloroethylene, Trans-	Vinyl chloride
Bromochloromethane	1,2-Dichloropropane	Xylene, M-
Bromodichloromethane	1,3-Dichloropropane	Xylene, O-
Bromoform	1,3-Dichloropropene	Xylene, P-
Bromomethane	Ethylbenzene	Xylene, Total
Butanol, N-	Ethyl methacrylate	Polyaromatic Hydrocarbons
Butylbenzene, N-	Hexachlorobutadiene	Acenaphthene
Butylbenzene, Sec-	Hexane, N-	Acenaphthylene
Carbon disulfide	2-Hexanone	Anthracene
Carbon tetrachloride	Methyl ethyl ketone	Benzo(a) anthracene
Chlorobenzene	4-Methyl-2-Pentanone	Benzo(a) pyrene
Chloroethane	Methylene Chloride	Benzo(b) fluoranthene
Chloroform	Methyl tert butyl ether	Benzo(g,h,i)perylene
Chloromethane	Propylbenzene	Benzo(k) fluoranthene
Chlorotoluene, O-	Styrene	Chrysene
Chlorotoluene, P-	1,1,1,2-Tetrachloroethane	Dibenzo(a,h)anthracene
Cumene	1,1,2,2-Tetrachloroethane	Fluoranthene
1,2-Dibromo-3-chloropropane	Tetrachloroethylene	Fluorene
Dibromochloromethane	Toluene	Indeno(1,2,3-cd) pyrene
1,2-Dibromomethane	1,2,3-Trichlorobenzene	1-Methylnaphthalene
1,2-Dichlorobenzene	1,2,4-Trichlorobenzene	2-Methylnaphthalene
1,3-Dichlorobenzene	1,1,1-Trichloroethane	Naphthalene
1,4-Dichlorobenzene	1,1,2-Trichloroethane	Phenanthrene
1,4-Dichloro-2-butene, Trans-	Trichloroethylene	Pyrene
Dichlorodifluoromethane	Trichlorofluoromethane	
1,1-Dichloroethane	1,2,3-Trichloropropane	

Specific and detailed information regarding the work performed under the Remediation Work Plan, the remedial objectives achieved for this project, and contaminant concentrations at the time of closure are available online on the Indiana Department of Environmental Management's Virtual File Cabinet located at <http://vfc.idem.in.gov/DocumentSearch.aspx>. The Remediation Work Plan for the Twigg Corporation is indexed on the Virtual File Cabinet as Document # 63851133 and #63851675 (plus numerous addendums found in VFC), and the Remediation Completion Report is indexed as Document #83364277.

Exhibit 3

Site Map

Exhibit 3 - VRP #6970506 - 659 East York Street - General Extent of VRP Project Area & ERC



Mapped By: Shane Moore, IDEM, Office of Land Quality, Science Services Branch, Engineering & GIS Services, January 16, 2024

General Extent Info: General Extent of VRP Project Area is typical with the ERC


Allen County ERC Info: Instrument #202304696 Recorded 08/08/2023

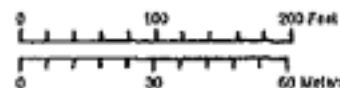
Parcel ID: 55-13-04-430-018.000-021

PLSS Info: Section 4, T11N, R1E, Washington Township, Morgan County, IN

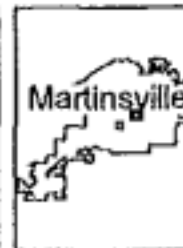
Property: 659 East York Street, Martinsville, Indiana

Disclaimer: This map is intended to serve as an aid in graphic representation only. This information is not warranted for accuracy or other purposes.

 Environmental Restrictive Covenant and General Extent



Morgan County Project Area



**CERTIFICATE OF COMPLETION
SIGNATURE PAGE**

Raso I LLC, 659 East York Street, Martinsville, IN 46151
[Insert name and mailing address of property owner]

("Owner") hereby attests to the accuracy of the statements in this document and all attachments.

IN WITNESS WHEREOF, Raso I LLC the said Owner of
[Insert Owner's Name]

659 East York Street parcel identification number[s] 55.13.04.430.018.000.021
[insert address of site], [insert 15-digit parcel identification number(s) as described in SIC 23-8-1]
has caused this Certificate of Completion to be executed on this 18 day of
June, 2024.

[Signature]
[Owner's or Representative's Signature]
Name: Roy Rapp III
Title: Manager

STATE OF Indiana)
COUNTY OF Morgan) SS:

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared Roy Rapp III, the Manager of the Owner, Raso I LLC, who acknowledged the execution of the foregoing instrument for and on behalf of said entity.

Witness my hand and Notarial Seal this 18 day of June, 2024.

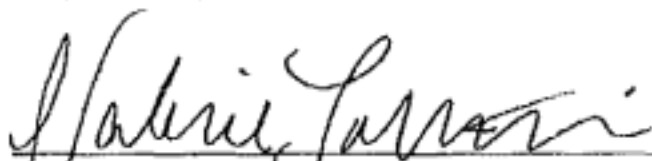


Sarah Clark
Sarah Clark, Notary Public
Residing in Indiana County, Morgan

My Commission Expires (Include Seal):

Affidavit for Review and Redaction of Social Security Numbers

I affirm, under the penalties for perjury, that I have taken reasonable care to redact each Social Security number in this IDEM Certificate of Completion document, unless required by law.

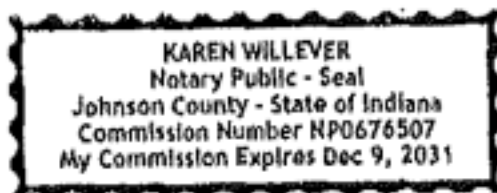


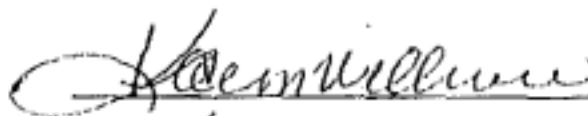
Valerie Tachtiris, Deputy Assistant Commissioner
Indiana Department of Environmental Management
Office of Legal Counsel

STATE OF Indiana)
COUNTY OF Marion) SS:

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared Valerie Tachtiris and signed this before me.

Witness my hand and Notarial Seal this 14th day of May, 2024.





Karen Willevier

Notary Public (please sign and print)

Residing in Johnson County, Indiana

My Commission Expires: 12/9/2031

This document was prepared by:

Valerie Tachtiris, Deputy Assistant Commissioner
Indiana Department of Environmental Management
Office of Legal Counsel
100 N. Senate Avenue, Room #1307
Indianapolis, Indiana 46204