



# Rolls-Royce

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July 15, 2024

Ms. Jennifer Stanhope  
U.S. Environmental Protection Agency  
Land and Chemicals Division  
77 W. Jackson Blvd. LU-9J  
Chicago, IL 60604

Subject: Second Quarter 2024 Progress Report  
RCRA Corrective Action  
Rolls-Royce Corporation, Indianapolis, IN  
EPA ID Nos. IND000806836 and IND094469913

Dear Ms. Stanhope,

In accordance with the requirements of the Administrative Order on Consent between the U.S. Environmental Protection Agency Region 5 (EPA) and Rolls-Royce Corporation (Rolls-Royce), please find the attached progress report for the first quarter of 2024 (April 1, 2024 through June 30, 2024; Attachment A).

Please contact me if you have any questions regarding this matter.

Sincerely,

Rolls-Royce Corporation

A handwritten signature in cursive script that reads "Laura Groom".

Laura Groom  
Health, Safety and Environmental Manager

Copies:

Glynda Oakes, IDEM Office of Land Quality, (electronic)  
Jason Ravenscroft, Marion County Health Department, (electronic)  
West Branch Indianapolis Library (Public Information Repository) (electronic)  
Neil Bloede, Rolls-Royce North America, (electronic)  
Duncan Taylor, Rolls-Royce, (electronic)  
Sarah Fisher, Arcadis, file

**ATTACHMENT A****SECOND QUARTER 2024 PROGRESS REPORT  
ADMINISTRATIVE ORDER ON CONSENT  
ROLLS-ROYCE CORPORATION  
APRIL 1, 2024 THROUGH JUNE 30, 2024****WORK PERFORMED THIS QUARTER**

- On April 12, 2024, Arcadis responded to the March 26, 2024 EPA comments on the Semi-Annual Status and Groundwater Monitoring Report – Second Half 2023 and provided a revised report. On June 25, 2024, EPA accepted the response to comments and revised report.
- On April 12, 2024, Arcadis requested an update to the due dates for groundwater modelling and updated annual cost estimate from EPA. On April 18, 2024, Arcadis received EPA approval of revised timelines.
- On April 12, 2024, submitted the Lower Sand and Gravel Unit Evaluation to EPA. Received comments from EPA on April 24, 2024.
- On April 15, 2024, submitted the First Quarter 2024 Progress Report. EPA approved the progress report on April 22, 2024.
- On April 30, 2024, submitted draft letters to EPA for off-site communications to property owners regarding operation, maintenance, and monitoring of vapor mitigation systems. Received comments from EPA on May 8, 2024. Submitted letters to residents on May 29, 2024.
- On May 6, 2024, Arcadis sampled soil gas vapor ports in the neighbourhood south of Plant 5. Soil gas port 5-2SVP-2105D was resampled on May 22, 2024 due to final vacuum measured at the laboratory during the initial sampling event.
- Communicated with off-site property owners south of Kentucky Avenue regarding results from private groundwater well sampling. On May 22, 2024, submitted data summary letters to the EPA for review detailing sampling results and recommendations for the properties south of Kentucky Avenue. Completed additional private groundwater well sampling on May 31, 2024. Continued working with one property owner for initial site access.
- Submitted the Vapor Intrusion Report-2023 to EPA on May 17, 2024.
- On June 17, 2023, received comments from EPA on the Revised Comprehensive Vapor Intrusion Report Summer-Fall 2022 (Arcadis, December 1, 2023) and Vapor Intrusion Summary Report-2023 (Arcadis, May 17, 2023).
- Arcadis, Rolls-Royce, and EPA attended monthly update calls to review status of project tasks.

**DATA AVAILABLE DURING THIS QUARTER**

- Data from the first half 2024 groundwater sampling (to be included in the RCRA Corrective Action Interim Measures Semi-Annual Status and Groundwater Monitoring Report, First Half 2024 report);

- Data from the soil gas sampling (May 2024; to be included in a vapor intrusion summary report with an anticipated submittal in July 2024); and
- Data from water well sampling at the request of the EPA at off-site properties south of Kentucky Avenue (included in the RCRA Corrective Action Interim Measures Semi-Annual Status and Groundwater Monitoring Report, First Half 2024).

**PROBLEMS ENCOUNTERED**

- One well was not located during the first half 2024 groundwater sampling event: 8-2MW-0101. One well was inadvertently missed during the event (8-10MW-0203).

**SUMMARY OF PROBLEM RESOLUTION**

- Use air knife capabilities to uncover 8-2MW-0101, which is now covered by a gravel road, and either combine contours that lack a delineation well between or install a new monitoring well to use for separation of the contours. Monitoring wells 8-2MW-0201 and 8-10MW-0203 will be sampled in the fall of 2024.

**POTENTIAL PROBLEMS**

- None.

**ESTIMATED PERCENT COMPLETE FOR SELECTED ACTIVITIES**

- Potential Vapor Intrusion Evaluation 95%  
*(Updated based on discussion with EPA and additional work required.)*
  - On-site Vapor Intrusion Evaluation 95%
  - Off-site Vapor Intrusion Evaluation 90%
  - Sewer Evaluation 100%
- Water Use Evaluation 98%
- Lower Sand and Gravel Unit Evaluation 10%

**CHANGES IN PERSONNEL**

None.

**PROJECTED WORK FOR NEXT REPORTING PERIOD**

- Prepare and submit the **Semi-Annual Status and Groundwater Monitoring Report – First Half 2024**.
- Revise and resubmit the QAPP based on the EPA comments received on December 6, 2023 (Water Use Evaluation 2023 Addendum) and the December 14, 2023 QAPP comments.
- Prepare and submit the Semi-Annual Vapor Intrusion Monitoring Report – First Half 2024.

- Update final financial assurance documents per the EPA-approved Annual Adjusted Cost Estimate, if warranted, based on the Ground Flow and Solute Model.
- Prepare and submit the Response to Comments to EPA regarding the Lower Unit Sand and Gravel Evaluation.
- Complete vapor intrusion sampling as agreed upon between EPA and Rolls-Royce.
- Prepare the Third Quarter 2024 Progress Report.
- Complete the fall Semi-Annual 2024 groundwater gauging and sampling.
- Continue conversations with off-site property owners for access agreement execution. Notify EPA within 2 business days when access for sampling is obtained and sampling is scheduled.
- Upon receiving the Final Decision from EPA, evaluate monitoring wells located on site to determine which monitoring wells are no longer necessary and could potentially be abandoned.
- Prepare ERCs for any potential property transfers in accordance with the Corrective Measures Proposal as necessary.
- Prepare responses to any EPA comments and summaries of data reviews or other conference calls with EPA and IDEM as appropriate.

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