INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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August 9, 2024

Mr. Randy Retherford
Fort Wayne Steel Corporation
2302 Taylor Street
Fort Wayne, IN 46802

Transmitted via Email

Dear Mr. Retherford:

Re: Response to IDEM Comment Letter (January 8, 2024)
Fort Wayne Steel Corporation – Junk Ditch
2302 Taylor Street
Fort Wayne, IN 46802
VRP #6180601

The Indiana Department of Environmental Management (IDEM), in coordination with the United States Environmental Protection Agency (USEPA), has reviewed the Response to IDEM Comment Letter (January 8, 2024) (Stantec Consulting Services, Inc. [Stantec], May 7, 2024) for the Fort Wayne Steel Corporation (FWSC) – Junk Ditch site located near 2302 Taylor Street in Fort Wayne, Indiana.

The response document was uploaded to the IDEM Virtual File Cabinet (VFC) as document #83634811. Further site history can be found in the VFC located on the IDEM website vfc.idem.in.gov. This technical letter contains a brief background summary including comments generated during our review of the above mentioned report.

Background

Junk Ditch is a perennial stream that flows north from Eagle Marsh in the southwest portion of Fort Wayne, Indiana to its confluence with the St. Mary's River approximately one mile northeast of the site. According to a May 2013 report[1] by the United States Army Corps of Engineers (USACE), Junk Ditch has been moved from its natural bed and straightened over time by anthropogenic means. During flood events in the St. Mary's River, flow reversals (to the south) have been observed. The depth of the Junk Ditch channel is approximately eight to ten feet from top of bank to bottom of the stream and is approximately 20 feet wide. Local groundwater flow beneath Junk Ditch is predominantly to the east towards the St. Mary's River.

Previous investigations of Junk Ditch in the vicinity of FWSC took place in 2000 and 2005 through 2007. The 2000 investigation was conducted by Keramida on behalf of Slater Steel Corporation, while the 2005 through 2007 investigations were conducted by TechLaw under a USEPA contract. Summary reports of these historic investigations were provided to IDEM as an appendix to a January 2012 Remediation Work Plan (RWP) for the neighboring Valbruna Slater Steel Corporation (VSSC) site.

On March 22, 2018, representatives from IDEM and USEPA, Region 5 met with representatives of VSSC and FWSC to discuss the status of remediation at the sites as well as necessary revisions to the January 2012 RWPs. After the meeting, IDEM and USEPA, Region 5 provided a list of comments to be addressed in revisions to the RWPs. As part of these

comments, a strategy was requested to fully delineate, characterize, and remediate the contaminated sediments in Junk Ditch. As a result, FWSC entered a section of Junk Ditch along the western edge of the VSSC facility into the IDEM Voluntary Remediation Program (VRP). This new VRP site was assigned Project #6180601.

On behalf of FWSC, Stantec submitted a Remediation Investigation Plan (RIP) on February 13, 2019 with revisions submitted on July 23, 2019 and December 4, 2019. The December 2019 revision was approved by IDEM for implementation in an email dated February 26, 2020. In accordance with the approved RIP, surface water sampling of Junk Ditch was conducted on two occasions (November 19, 2019 and January 22, 2020) at twelve locations with approximately 200-foot spacing. Surface water samples were submitted for laboratory analysis of polychlorinated biphenyls (PCBs) and Resource Conservation and Recovery Act (RCRA) 8 metals as well as cobalt, iron, manganese, and nickel. In addition, sediment samples were collected at 45 transects within and along Junk Ditch between October 29, 2019 and November 10, 2020. The transects were spaced approximately 50 feet apart, and samples were collected along the west bank, centerline, and east bank of Junk Ditch. One-foot sampling intervals were utilized from zero to three feet below the sediment surface. All sediment samples were analyzed for PCBs and RCRA 8 metals as well as cobalt, iron, manganese, and nickel. Every fourth transect was sampled for grain size and total organic carbon (TOC) from the shallowest sampling interval.

The results of the 2019 and 2020 surface water and sediment sampling events were summarized in a Junk Ditch Investigation Data Package report dated March 15, 2021. IDEM and USEPA responded to the investigation report with a request for a Human Health Risk Assessment and Screening Level Ecological Risk Assessment. In turn, a Human Health Risk Assessment (HHRA) and Screening Level Ecological Risk Assessment (SLERA) document was submitted on March 17, 2023. IDEM responded to the HHRA and SLERA in a letter dated July 31, 2023. A response to IDEM's comments was submitted on September 29, 2023. IDEM, in coordination with USEPA, provided rejoinders to the comment responses in a letter dated January 8, 2024.

Following the issuance of the coordinated letter, representatives from IDEM and USEPA, Region 5 met with representatives of FWSC on March 1, 2024 to discuss a path forward for achieving final characterization of Junk Ditch in order to develop a site remedy. As discussed during the meeting (and confirmed in an IDEM email sent on March 4, 2024), a response to the January 8, 2024 letter and an investigation work plan for Junk Ditch was requested by May 7, 2024. The requested response and investigation work plan was subsequently submitted by Stantec on May 7, 2024. Comments generated during review by IDEM, in coordination with the USEPA, are summarized below.

Comments

1. The proposed methodologies discussed in the Sampling and Analysis Plan (SAP) in Attachment B seem appropriate. However, IDEM suggests that sediment samples be analyzed using USEPA's Methods for the Determination of Total Organic Carbon (TOC) in Soils and Sediments, by Brian A. Schumacher (April 2002) rather than by the Lloyd Kahn Method.

2. Stantec proposes to provide full (Level IV) analytical data for validation with the collected sediment samples, which seems appropriate. However, per the Risk-Based Closure Guide (R2), providing Level II Quality Assurance/Quality Control (QA/QC) documentation for the

collected sediment samples is also acceptable. The IDEM QA/QC documentation recommendations can be found in Section 2.2.9 (Table 2-B) of the R2.

3. You may proceed with implementing the SAP found in Attachment B of the response document to conduct the Junk Ditch Bioavailability Study. If the Lloyd Khan Method is used to conduct TOC analysis, please provide lines of evidence in your investigation summary report which support the use of this method rather than the USEPA's Brian A. Schumacher Method.

As described above, you may proceed with conducting the Junk Ditch Bioavailability Study. If you have any questions, please contact me at (317) 233-7089, (800) 451-6027, or at MNance@idem.IN.gov. Additionally, please contact me at least two weeks prior to conducting field activities so that IDEM and USEPA staff may observe.

Sincerely,

Mark A. Nance

Mark A. Nance,
Senior Environmental Manager
Voluntary Remediation Program
Office of Land Quality

ec: Ms. Kathleen Graham, Stantec Consulting Services, Inc.
Mr. Benjamin D. Schutt, P.E., Stantec Consulting Services, Inc.
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Mr. Tyler Jacobs, USEPA, Region 5
Mr. Peter Ramanauskas, USEPA, Region 5
Mr. George Ritchotte, IDEM, Office of Land Quality
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References

1. USACE. (2013, May). *Aquatic Nuisance Species Controls Report Wabash-Maumee Basin Connection Study.* Fort Wayne, Indiana. Retrieved from Great Lakes and Mississippi River Interbasin Study: http://glmris.anl.gov/documents/docs/interim/Eagle_Marsh_ANS_Controls_Report.pdf