



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
Governor

Brian C. Rockensuess  
Commissioner

August 21, 2024

Richard Krieg  
Dick Krieg Motors, Inc.  
1932 West 550 South  
Lafayette, IN 47909

Re: Remediation Work Plan Review  
Dick Krieg Motors  
1648 US 421  
Delphi, IN 46293  
VRP #6160805

Dear Mr. Krieg:

The Indiana Department of Environmental Management (IDEM) has reviewed the Remediation Work Plan and Completion Report (Alliance Environmental Group, Inc. [AEG], July 1, 2024) for the Dick Krieg Motors site located at 1648 US 421 in Delphi, Indiana.

The report was uploaded to the IDEM Virtual File Cabinet (VFC) as document # 83661744. Further site history can be found in the VFC located on the IDEM website [www.idem.in.gov](http://www.idem.in.gov). This technical letter contains a brief background summary including comments generated during our review of the above-mentioned report.

### Background

The site consists of an approximately 4.63-acre lot with a commercial building, an attached auto service garage and an asphalt parking lot. It is in a mixed light commercial, agricultural, and residential area. Ground-penetrating radar surveys conducted in 2017 indicated a potential septic system leach field southwest of the asphalt parking lot. The site has historically operated as an automobile dealership, with operations possibly beginning as early as 1961. Prior to this, site use was agricultural. The site has operated as Dick Krieg Motors, an automotive dealership since 1974. It is currently occupied by Mann Chevrolet Buick GMC, an automotive sales and service facility.

The release-related chemicals (RRCs) are petroleum-related Volatile Organic Compounds (VOCs) and chlorinated VOCs (cVOCs). Suspected sources of the COCs are petroleum and degreasing solvents which entered the septic system through the service bay floor drain system. During site investigations, two small, isolated areas of groundwater impacts were identified. One area of groundwater contamination was located under the building near the service area. The second area of groundwater contamination was located southwest of the building, near the recorded septic area. Contaminants in this area were limited to petroleum-related VOCs. Exceedances of residential published levels (PLs) were observed in both source areas. Soil contamination was limited and below applicable PLs. Contamination remains on-site.

The remedial action objectives (RAOs) for this site have been based on Remediation Closure Guide (RCG) Screening Levels; however, the RAOs should be revised to reflect IDEM's latest technical guidance R2 Published Levels (PLs). The following comments were made during our review of the remediation work plan:



Visit [on.IN.gov/survey](http://on.IN.gov/survey) or scan the QR code to  
provide feedback.

*We appreciate your input!*

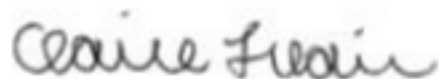


Comments

1. The proposed RAOs in Section C of the Introduction are not quantitative. IDEM recommends using R2 PLs as the remedy objectives. For acceptable remedy objectives, see R2 Section 3.3.
2. References were not provided for the ecological risk assessment. Please submit information supporting AEG's conclusion that no critical habitats or endangered species (federal and state) are located within 0.5-miles of the site.
3. The proposed remedy is acceptable. AEG may abandon the monitoring wells once the RWP is approved.
4. As part of the Community Relations Plan (CRP), AEG intends to send the RWP notification letter to adjoining landowner JSLN Enterprises LLC. This is acceptable.
5. The CRP does not provide a local newspaper for IDEM to publish the public notice announcement in. Please indicate a newspaper for the public notice ad.

Please respond within 45 days from receipt of this letter with a Remediation Work Plan Addendum that addresses these comments. Following formal approval of the RWP, IDEM will review the Remediation Completion Report portion of this document. If you have any questions, please contact me at (317) 234-9731, (800) 451-6027, or at email [CFredin@idem.in.gov](mailto:CFredin@idem.in.gov).

Sincerely,



Claire Fredin  
Project Manager  
Voluntary Remediation Program  
Office of Land Quality

cc: Kent Shadley, CHMM, Vice President, Field Services, AEG ([KShadley@aegindy.com](mailto:KShadley@aegindy.com))  
Glenn Bowman, SKO Firm ([Glenn.Bowman@skofirm.com](mailto:Glenn.Bowman@skofirm.com))

*It is the goal of IDEM to enable remediation sites to move forward in a timely manner. If an impasse has been reached over technical issues, a Technical Review Panel of non OLQ scientists is available to review and offer a non-binding opinion to help resolve technical disagreements with the VRP and State Cleanup Program project managers. The goal is to facilitate progress at your site. This review process is available immediately. If you would like to request a review by the Panel, please contact Kevin Davis, Remediation Branch Chief for Office of Land Quality, at [KDavis2@idem.in.gov](mailto:KDavis2@idem.in.gov) or (317) 232- 4535.*

*Any decision produced by the Technical Review Panel is not an agency action as defined in IC § 4-21.5-1-4 or an order as defined in IC §4-21.5-1-9. This decision is not subject to administrative review because it is not a determination of any legal rights, duties, privileges, immunities, or other legal interests, and because it is issued pursuant to an informal procedure for dispute resolution as allowed by IC 4-21.5-3-34 (a).*