

REMEDIATION WORK PLAN ADDENDUM 2
Former Oil Storage Tank Area
Marport LLC (Formerly Osharai Indiana) Site
4323 Kennedy Ave., East Chicago, IN 46312
Site # 6211101

Prepared For:

Indiana Department of Environmental Management
Voluntary Remediation Program
Indianapolis, Indiana

Prepared By:

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1. INTRODUCTION

Tradebe Environmental Services, LLC received a letter from Ms. Claire Fredin of the Indiana Department of Environmental Management (IDEM) on July 23, 2024 which provided IDEM's comments on the Remediation Work Plan Addendum dated March 25, 2024 for the Marport LLC (formerly Osharai Indiana) site located at 4323 Kennedy Avenue in East Chicago, Indiana that was prepared by Trinity Consultants.

The purpose of this Remediation Work Plan Addendum is to provide our responses to these comments as well as include revised pages of the Remediation Work Plan that have been modified as a result of the comments. The following section presents the IDEM comment followed by Tradebe's response while Appendix A contains copies of the revised pages.

IDEM RWP Addendum Comments

Comment 1. While a residential restriction in the Environmental Restrictive Covenant (ERC) is not required per IDEM's comment letter dated March 21, 2024, Section 3.2 of the RWP should provide explanation for why it is not despite the observed exceedances in the groundwater.

Tradebe Response: Tradebe has revised Section 3.2 to include an explanation as to why a residential restriction is not requested.

Comment 2. The phone number provided for the IDEM project manager in the sample notification letter is incorrect. The corrective action phone number is 317-934-9731. In addition, the project manager's last name is spelled incorrectly. Please revise to say "Fredin".

Tradebe Response: Tradebe has revised the sample notification letter contained in the Community Relations Plan to reflect the comment.

IDEM General Comments

The applicant, Tradebe, entered into VRP for a release from a 120,000-gallon heating oil tank. As such, Covenant Not To Sue (CNTS) coverage will be granted for petroleum RRC's only. Additional delineation is required to determine the maximum concentrations on-site should Tradebe wish to receive coverage for cVOCs. CNTS coverage will not apply to higher concentrations or subsequently discovered cVOCs releases at other locations within facility, cVOCs releases found during future RCRA investigations, or to new releases of cVOCs.

In addition, contradictions regarding the source of the cVOCs have been noted in report submittals and verbal statements made by Trinity to IDEM staff. If Tradebe wants CNTS coverage for cVOCs, these contradictions must be resolved for the work plan to be approved.

Tradebe Response: Tradebe understands that the CNTS for the Marport LLC (Formerly Osharai Indiana) site will be granted for petroleum RRCs only. Tradebe does not wish to receive coverage for cVOCs at this time.

APPENDIX A. REVISED RWP PAGES

3.1 Risk Management

Marport LLC (Formerly Osharai Indiana) planned remediation strategy includes implementing an Environmental Restrictive Covenant to manage future potential risk. The Environmental Restrictive Covenant will include a potable groundwater use provision. This provision will apply to the entire property. A residential use restriction was evaluated, however, based on the soil, groundwater, and risk of vapor intrusion, as well as the industrial nature of the area, a residential use restriction is not necessary.

3.2 Remedial Options Considered

The remedial option for the Site will be the Environmental Restrictive Covenant as this document will restrict Site activities appropriately to limit potential receptors contact with impacted media. As such, there are no active remedial options planned for the Site.

COCs in soil are not currently above respective IDEM Risk-based Closure Guide Published Levels, therefore no remedial options for soil were considered.

Groundwater recovery and treatment or in-situ treatment were considered for remediation of groundwater in the area around MW-1. Groundwater remediation is not necessary considering that the groundwater in the area is not used for drinking water as the area is supplied by municipal water, the site is located in a heavily industrialized area with known groundwater contamination and the Environmental Restrictive Covenant will prevent potential exposure to the impacted groundwater.

APPENDIX B. SAMPLE WRITTEN NOTICE TO PROPERTY OWNERS

WRITTEN NOTICE

This notice is being provided to inform you of the presence of a site in your neighborhood that has been accepted into IDEM's Voluntary Remediation Program. IDEM's Voluntary Remediation Program provides a process for property owners, operators, potential purchasers, and third parties to voluntarily address (by investigating and, if necessary, remediating) property that is or may be contaminated. This notice is a requirement of a Community Relations Plan which has been developed by Marport LLC and is a component of the Remediation Work Plan that is available for review at the repository listed below. The Community Relations Plan includes provisions for notifying all neighboring property owners and occupants, neighborhood organizations and other local entities. In addition, the Community Relations Plan may require the applicant to post an informational sign at the subject property. For additional information about the Community Relations Plan and the Remediation Work Plan please review the documents in the repository or contact the IDEM Project Manager at (317) 234-0973."

This notice is a requirement of a Community Relations Plan, which has been developed by Trinity Consultants, on behalf of Marport LLC, and is a component of the Remediation Work Plan that is available for review online within IDEM's Virtual File Cabinet at the address located below.

<https://www.in.gov/idem/legal/public-records/virtual-file-cabinet/>

Additionally, a paper copy of the Remediation Work Plan will be available at the Robert A. Pastrick Branch East Chicago Public Library as listed below. The Community Relations Plan includes provisions for notifying all neighboring property owners and occupants and other local entities.

Work to be performed at the site includes recording an environmental restrictive covenant (ERC) on the property deed of the Marport LLC property. The residual contamination on the site is from a former above ground petroleum storage tank for which investigations have determined that the residual contamination is contained on-site. The public comment period is 30 days from the date of publication of this notice. To comment on the VRP Project documents at the Robert A. Pastrick Branch East Chicago Library in East Chicago, Indiana, number the comments: refer to the document and page number you are commenting on. Address your comments to the Indiana Department of Environmental Management, Voluntary Remediation Program, 100 N. Senate Avenue, P.O. box 6015, Indianapolis, Indiana 46206-6015.

For additional information about the Community Relations Plan and the Remediation Work Plan, please review the documents in the Robert A. Pastrick Brand East Chicago Library in East Chicago, Indiana (219) 367-6715 or contact the IDEM Project Manager, Claire Fredin, at (317) 934-9731.