



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb  
Governor

Brian C. Rockensuess  
Commissioner

September 17, 2024

Wesley Hawk  
220 East Saint Claire Street  
Indianapolis, Indiana 46204

\*Transmitted via Email\*

Re: Winter 2023/2024 On-Site Vapor Intrusion Assessment Summary & 2023 Annual  
Groundwater Monitoring Report  
Office Furniture Mart  
3448 Shelby Street  
Indianapolis, Indiana 46227  
VRP # 6130603

Dear Mr. Hawk:

The Indiana Department of Environmental Management (IDEM) has reviewed the Winter 2023/2024 On-Site Vapor Intrusion Assessment Summary (prepared by EnviroForensics, LLC [EFI], June 17, 2024) and the 2023 Annual Groundwater Monitoring Report (prepared by EFI, July 29, 2024) for the Office Furniture Mart site located at 3448 Shelby Street in Indianapolis, Indiana.

The reports were uploaded to the IDEM Virtual File Cabinet (VFC) as documents # 83655192 (Winter 2023/2024 On-Site Vapor Intrusion Assessment Summary) and # 83674569 (2023 Annual Groundwater Monitoring Report). Further site history can be found in the VFC located on the IDEM website [vfc.idem.in.gov](http://vfc.idem.in.gov). This technical letter contains a brief background summary including comments generated during our review of the above-mentioned report.

### Background

The Office Furniture Mart site is located on the south side of Indianapolis. The site has operated as a retailer and warehouse for new and used furniture since 1995. Past use of the site included industrial use consisting of metallurgy and bearing manufacturing. The surrounding properties are mixed use commercial and residential properties.

The source area of the chlorinated volatile organic compounds (cVOCs) was determined to be beneath the central portion of the site building. Trichloroethylene (TCE) was detected in the soil near the former machine pads. Tetrachloroethylene (PCE) was detected in soil borings south of the building in the loading area. Further investigation activities occurred from 2012-2020 to characterize the soil and groundwater contamination.

The upper water-bearing zone is present from 10-25 feet below ground surface and the lower water-bearing zone is present from approximately 30-50 feet below ground surface. A clay layer underlies the central and eastern portions of the site. The upper water bearing zone and lower water bearing zones are hydraulically connected due to the lack of a confining clay between the two zones around MW-39. The shallow plume flows southwest and the deep plume flows east.



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*We appreciate your input!*



Several residences within a one-mile radius of the site were identified as using potable wells. In November 2018, Marion County Health gathered information from the area to complete a Neighborhood Environmental Health Risk Summary and it identified Bethany Village (a long-term care facility) as a vulnerable site and six occupied homes utilizing potable wells. Only one home, 743 East Werges Ave., allowed access to sample their well and the results indicated no cVOCs were present above laboratory detection limits (VFC #82657006). Currently, none of the properties on a potable well appear to be in the path of the plume. One area serviced by potable wells are to the west of the site and the other area serviced by potable wells is to the southeast of the site.

Vapor intrusion (VI) investigations began at the site building and immediate down-gradient properties to the south in 2014. The on-site (3448 Shelby St.) Office Furniture Mart will continue to be monitored during winter worst-case conditions. Vapor intrusion was ruled out at 1010 E Sumner Ave., 1012 E Sumner Ave., 1024 E Sumner Ave., 1028 E Sumner Ave., and 3450 S Shelby St. after a winter and summer vapor intrusion sampling event in 2014 and/or 2015. The elevated TCE sub-slab levels at 1005 E Sumner Ave. are possibly attributed to the former plating operations. The 3518 S Shelby St. nursing home requires no further sampling.

A remedy was implemented on May 30, 2017 through July 26, 2017 which included using in-situ injections to trap (Plume Stop) and to treat (Enhanced Reductive Dechlorination) the contaminant mass to reduce concentrations in the groundwater. Delineation and groundwater sampling continued post-remedy. The post-remedial groundwater results show a decrease in contaminants of concern in both the shallow and deep water-bearing zones.

Additional monitoring and remedies will be necessary for unacceptable risk on-site and off-site. Additional groundwater investigation is needed to complete the conceptual site model.

In January 2024, EFI conducted paired sub-slab soil gas/indoor air (SGss/IA) sampling of the site building. IA samples were non-detect and two sub-slab samples were above the commercial sub-slab published levels (CSSPLs), but below the large commercial CSSPLs. In December 2023, EFI gauged 43 wells and sampled 39. Comments generated during the review of the Winter 2023/2024 On-Site Vapor Intrusion Assessment Summary and the 2023 Annual Groundwater Monitoring Report are summarized below.

### Comments

#### **Winter 2023/2024 On-Site Vapor Intrusion Assessment Summary**

1. Two winter paired SGss/IA sampling events have been below the applicable published levels. If the property owner does not intend to restrict changes to the building size or layout, additional sampling will be required, including in the summer. Under current conditions, the VI pathway is considered incomplete.
2. No further sampling is necessary under the current use scenario. Additional sampling will be required if future property use is not restricted.

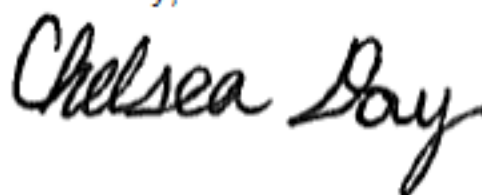
#### **2023 Annual Groundwater Monitoring Report**

1. EFI conducted an additional deep plume investigation to the northeast in May 2024. IDEM was recently notified that Wilcox Environmental Engineering, Inc. (Wilcox) will be the site consultant going forward. It is stated in a meeting summary dated August 20, 2024 (VFC # 83688125) that Wilcox will submit this data. This is acceptable.
2. Continued groundwater monitoring is required to evaluate possible increasing concentrations in some cVOC degradation products in monitoring wells.

3. The consultant noted that off-site well MW-21 on the Kennedy Tank property was discovered to be covered by approximately 10 inches of concrete during construction and could not be gauged, sampled, or properly abandoned. Evaluation regarding reinstallation of the "destroyed" well is pending negotiations between Office Furniture Mart and the City of Indianapolis for the nearby Advance Plating property. This is reasonable.

Please respond within 90 days from the receipt of this letter with the results of the deep plume investigation. Please also respond within 365 days from the receipt of this letter with an annual groundwater monitoring report. Wilcox must notify IDEM prior to conducting field work. If you have any questions, please contact me at (317) 232-8517, (800) 451-6027, or at [CNDay@idem.in.gov](mailto:CNDay@idem.in.gov).

Sincerely,



Chelsea Day,  
Project Manager  
Voluntary Remediation Program  
Office of Land Quality

cc: Scott Connors, Wilcox; [SConnors@wilcoxenv.com](mailto:SConnors@wilcoxenv.com)  
Wesley Hawk, Office Furniture Mart; [wes\\_hawk@officefurnituremart.com](mailto:wes_hawk@officefurnituremart.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 Services Branch Chief for the Office of Land Quality, at 317-232-4535 or [kdavis2@idem.in.gov](mailto:kdavis2@idem.in.gov).*

*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).*