



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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September 26, 2024

Darci Thomas
Uptown Investment Properties LLC
P.O. Box 44046
Indianapolis, Indiana 46044

Mr. Michael Einterz
College 60 Minute Cleaners, Inc.
4600 Northwest Plaza W
Zionsville, Indiana 46077

Re: Groundwater and Vapor Intrusion-Remediation/Monitoring Status Summary
College 60 Minute Cleaners
4838 North College Avenue
Indianapolis, Indiana 46205
VRP # 6170801

Dear Ms. Thomas and Mr. Einterz:

The Indiana Department of Environmental Management (IDEM) has reviewed the Groundwater and Vapor Intrusion-Remediation/Monitoring Status Summary (EnviroForensics, July 30, 2024) for the College 60 Minute Cleaners site located at 4838 North College Avenue in Indianapolis, Indiana (Site).

The report was uploaded to the IDEM Virtual File Cabinet (VFC) as document No. 83675473. 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

The Site operated as a dry-cleaning facility from the 1930s until 2015. Tetrachloroethylene (PCE) was utilized for dry cleaning operations at the Site between 1974 and 2015. In February 2016, the dry-cleaning equipment and associated materials were removed from the Site. The Site building was demolished in Spring 2017. Interim remedial actions at the Site have included soil vapor extraction (SVE) pilot study and operation, building demolition, source soil characterization and source soil excavation. The release related chemicals (RRCs) for the Site include PCE, its breakdown products, and carbon tetrachloride.

The Site is located on the northeast side of Indianapolis in a Wellhead Protection Area (WHPA) within the 5-year time of travel radius. The surrounding area is primarily residential with commercial properties adjacent to the north of the Site and across North College Avenue to the east. Neighboring residential properties are supplied by municipal water.



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We appreciate your input!



Comments generated during the review of the Groundwater and Vapor Intrusion-Remediation/Monitoring Status Summary are summarized below.

Comments

1. The groundwater sample results were generally consistent with previous monitoring results and indicate that on-site and off-site remedies are warranted.
2. There is no indication of post-remedial vapor sampling. EnviroForensics indicates that the vapor intrusion (VI) exposure scenario at the Site will be addressed via institutional controls, which presumably would be a VI investigation/mitigation restriction within an environmental restrictive covenant (ERC) for any future structures on the Site.
3. EnviroForensics specifically indicates that the Uptown Business Center vapor mitigation systems (VMSs) were shut down prior to paired sampling in February 2023. It is not stated when the systems were shut down. IDEM requests documentation on when the systems were shut down within the Uptown Business Center building.
4. EnviroForensics conducted follow up summer worst case sampling in August 2023. EnviroForensics does not specifically indicate whether the VMSs were shut down for the August sampling. IDEM requests information on whether the vapor mitigation systems were shut down prior to the August sampling.
5. Based on the two VI sampling events, EnviroForensics states that continued operation of the VMSs at the Uptown Business Center is no longer necessary and proposes decommissioning of the system. This is acceptable to IDEM based on two specific assumptions: 1) that the VMSs were shut down during both sampling events; 2) that the VMSs were shut down for at least 30 days prior to sampling. If either or both of these assumptions are not correct, an additional winter and/or summer worst case sampling event meeting these assumptions is recommended.
6. EnviroForensics also conducted summer worst case paired VI sampling at 4835 North College Venue in September 2023. Three indoor air samples (basement, first floor, second floor) and one sub-slab sample were collected. No RRCs were detected in any of the samples. EnviroForensics indicates that the property is screened out for further VI consideration. Given the complete lack of detections, IDEM agrees with this conclusion.
7. EnviroForensics states that two residences, located at 4824 and 4828 North College Avenue, have indicated the potential for VI based on highly elevated PCE concentrations in sub-slab samples in 2013-2015 (Scenario 3, Schedule 2) and should be sampled. However, since those samples were collected, access has either been denied (4824) or the property owner had been unresponsive (4828). Recently the property owner at 4828 North College Avenue has indicated willingness to allow access but a signed access agreement has yet to be received as of the time of the preparation of the document.
8. In addition, EnviroForensics identifies several other residential properties that overlie the plume and require VI characterization but have been unresponsive or denied access. These include properties at 4825/4827, 4829/4831, 4833 (located within the same structure as above-referenced 4835 North College Avenue), and 4837/4839 North College Avenue. IDEM has also contacted these properties to request access, to no avail. IDEM agrees that VI assessment is necessary at these, and other properties not mentioned in the report, as discussed below.

Based on groundwater sample results from monitoring wells MW-5S, MW-6S, and MW-13 and the visual depiction of the plume in Figure 3, additional VI assessment appears to be warranted. Residences with the potential for VI that have yet to be addressed include:

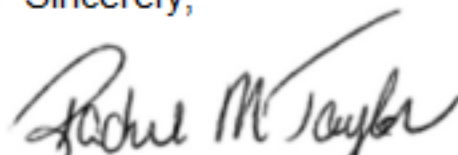
4810 N. College	4817 N. College
4809/4811 N. College	4730/4732 N. College
4726/4728 N. College	4720 N. College
4706/4708 N. College	4702/4704 N. College
651/653 E. 48th St.	

Given the lack of success in obtaining access at the above discussed properties and the additional properties to the south that have yet to be assessed, IDEM recommends an exterior soil gas investigation along the North College Avenue and East 48th Street right-of-way (ROW) to determine if additional paired VI sampling is warranted. It appears that the residences in this area generally have basements. IDEM recommends that samples be collected from depths just below basement level.

9. With respect to off-site VI and the residences that have been unresponsive or denied access, EnviroForensics provides the lines-of-evidence (LOE) indicating that properties bracketing the locations at 4825/4827, 4829/4831, 4833, and 4837/4839 North College Avenue have been screened out based on sampling, thus stating it can be assumed that these properties can be screened out as well. IDEM recommends that exterior soil gas sampling in the area of these and other yet to be investigated properties listed above would provide an additional LOE if concentrations are below published levels or would provide guidance for additional investigation if published levels are exceeded.
10. It was noted that the sampling date was incorrect with September 1, 2023 for the 4835 N. College Ave. sample results (OA, IA, and SGss) on the tables and figures instead of August 30-31, 2023 which was shown on the laboratory report. IDEM recommends this to be correct in any forthcoming reports.
11. It was noted that the consultant recommendation for 4835 N. College Ave. indicated "access denied" and "continue attempts to gain access for paired sampling" yet paired VI sample results for 4835 N. College Ave. were submitted with the report and the sample results are shown on Table 4 and Figure 4. IDEM recommends this information be updated in forthcoming reports.
12. The sampling procedures were not included in the report. Therefore, the results are considered estimated. In the future, the sampling procedures should be included to verify the sampling methods.
13. EnviroForensics concludes that PCE groundwater trends at the site are generally flat or declining except for MW-11, which peaked in November 2021, and down-gradient wells MW-8 and MW-12 demonstrate that the plume is not expanding. EnviroForensics also indicates that the PCE contamination is not a threat as potable water is municipally supplied in the area. While this may be the case, the site and plume are within a WHPA, and a groundwater remedy is necessary. EnviroForensics previously proposed in-situ groundwater remediation in an RWP Addendum (VFC #83383988), which IDEM found generally acceptable with modifications (VFC #83391519).
14. EnviroForensics indicates that the next groundwater monitoring event will be during the 3rd Quarter 2024. This is acceptable.

EnviroForensics must provide IDEM a two week notice of field activities. If you have any questions, please contact me at (317) 234-3793, (800) 451-6027 or at RMTaylor@idem.in.gov.

Sincerely,



Rachel M. Taylor, UPG #2645
Senior Environmental Manager
Voluntary Remediation Program
Office of Land Quality

EC: Mr. Mark Edmonson, EnviroForensics,

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.

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).