

September 10, 2024

Ms. Rachel M. Taylor, LPG  
IDEM Voluntary Remediation Program  
IGCN Room 1101  
100 North Senate Avenue  
Indianapolis, IN 46204-2251

via E-mail

Subject: Revised Response to IDEM RRWP Comments Letter  
Dated July 12, 2024 (VFC #83668254)  
Tara Plaza Shopping Center  
5425 West 34<sup>th</sup> Street  
Indianapolis, Marion County, Indiana  
VRP Site #6181102  
Polaris Project No. 170245

Dear Ms. Taylor,

On behalf of Ajamie Brothers, LLC (Client) Indianapolis, Indiana, Polaris Environmental, LLC (Polaris), is providing responses to the eight (8) comments to the Tara Plaza Shopping Center (Tara Plaza) 'Revised Remediation Work Plan' RRWP (VFC #83639826) and eight (8) comments on the draft ERC in the IDEM's July 12, 2024 letter (VFC #83668254).

IDEM comments are presented below in their entirety followed by responses in *italics*.

#### **RRWP Comments**

**IDEM RRWP Comment 1:** The extents of soil, groundwater, and soil gas contamination remain adequately delineated.

**Response:** *Polaris acknowledges the IDEM's comment finding the extents of soil, groundwater, and soil gas contamination remain adequately delineated.*

**IDEM RRWP Comment 2:** The proposed closure strategy includes the completed In-Situ Chemical Reduction (ISCR) injections, plume behavior analysis demonstrating the plume is

decreasing and/or stable, and implementation of appropriate institutional controls. The proposed remedial strategy is acceptable to IDEM.

**Response:** *Polaris acknowledges the IDEM's comment finding the proposed remedial strategy is acceptable to IDEM.*

**IDEM RRWP Comment 3:** Polaris indicates that upon completion of the eighth consecutive quarterly groundwater sampling event they will update the statistical trend analysis. If the trend data is favorable, Polaris desires the opportunity to meet with IDEM to discuss if additional groundwater monitoring is warranted. IDEM finds this acceptable.

**Response:** *The eighth consecutive quarterly groundwater sampling event was completed during June 21, 2024 the findings of which were provided the IDEM in the July 31, 2024 'Response to IDEM Comments Letter Dated June 18, 2024, Second Quarter 2024 Quarterly Monitoring Report (QMR)' (VFC #83655202). Included in the document was an updated Linear Regression / Mann-Kendall (M-K) trend analysis of the time-series groundwater data. Using only post-equilibration period sampling results (last eight (8) consecutive quarters) the plume was determined to be stable to decreasing. A meeting with the IDEM to discuss the Site and next steps to closure is scheduled for September 12, 2024.*

**IDEM RRWP Comment 4:** Polaris should revise the Mann-Kendall trend analysis using only data collected over one year after the active remedy was performed for each parameter exceeding GWPLs to determine if additional plume behavior sampling is warranted. If the plume is determined to be stable to decreasing, using only post-equilibration period sampling results, submittal of the proposed Remediation Completion Report, and closure using an on-site ERC is acceptable. Otherwise, additional plume behavior sampling may be warranted.

**Response:** *As found in the updated M-K statistical trend analysis provided the IDEM in the July 31, 2024 document, Polaris used the IDEM recommended ProUCL version 5.1 software to develop M-K PCE trend for source area monitoring well MW-7 for all sampling dates and for the last eight (8) consecutive quarters conducted September 2022 through June 2024. Using only post-equilibration period sampling results (last eight (8) consecutive quarters) the plume was determined to be stable to decreasing.*

**IDEM RRWP Comment 5:** It does not appear that methane monitoring has occurred post implementation of the injections. One sampling event should include methane assessment according to IDEM guidance in MW-6 through MW-11, and MW-13 through MW-15 to determine present site conditions with regards to methane.

**Response:** *Polaris will discuss this request during the September 12, 2024 meeting with the IDEM.*

**IDEM RRWP Comment 6:** Since impacted soils remain a potential at the site, a Soil Management Plan (SMP) should be developed in accordance with IDEM Guidance and referenced by VFC# in a revised ERC (see Comments on Draft ERC #7, below).

**Response:** *Polaris will prepare a SMP for submittal to the IDEM under separate cover. The SMP will be referenced by VFC number in a revised ERC.*

**IDEM RRWP Comment 7:** IDEM recommends obtaining access to monitoring well MW-8 and collecting a groundwater sample during the next groundwater sampling event.

**Response:** *As found in the July 31, 2024 'Response to IDEM Comments Letter Dated June 18, 2024 Second Quarter 2024 Quarterly Monitoring Report (QMR)' (VFC #83655202), Polaris sampled groundwater from monitoring well MW-8. All COPCs tested below laboratory reporting limits (non-detect).*

**IDEM RRWP Comment 8:** A Remediation Completion Report will be prepared once the plume behavior analysis is completed, which is acceptable.

**Response:** *Polaris acknowledges the IDEM's comment regarding preparation/submittal of a Remediation Completion Report.*

### **Comments on Draft ERC**

**Draft ERC Comment 1:** There is a discrepancy with the zip code. The deed and ERC have the site zip as 46222. The Secretary of State has the site zip as 46224. Please have this verified.

**Draft ERC Comment 2:** All exhibits must be attached to ERC in their proper places before ERC approval.

**Draft ERC Comment 3:** All maps should be revised to be 8.5 X 11, black and white, non-aerial view with parcel boundaries, parcel numbers, cross streets and/or roads clearly depicted. All other items are to be removed and all call out boxes are to be removed. These maps will be recorded in black and white and must have clearly identifiable markings. Map depictions should be clear and uncluttered.

**Draft ERC Comment 4:** In the first WHERAS paragraph insert the Deed Instrument Number and remove the word "Record" after the word "Deed."

**Draft ERC Comment 5:** In the fourth WHERAS paragraph the last sentence should read as “The Real Estate is also depicted as a polygon on IDEM’s GIS web viewer (currently <https://on.in.gov/ideminteractivemap> ).”

**Draft ERC Comment 6:** IDEM recommends that restriction (b) be for the entire Real Estate. As such, the “Affected Area” is recommended to be restated as “Real Estate.”

**Draft ERC Comment 7:** Restriction is recommended to be revised with the following language to incorporate the SMP:

“Shall neither engage in nor allow excavation of soil at depths greater than depth restriction feet in the area identified via *Choose an item* as the “Construction Worker Restriction Area” depicted on Exhibit *Choose an item*. The Owner, upon the Department’s request, shall provide the Department evidence showing the excavated and restored area do not represent a threat to human health or the environment. In accordance with *insert title and date of the IDEM approved Soil Management Plan*, described in VFC #VFC Number, and any IDEM approved updates.”

**Draft ERC Comment 8:** General Provisions #6 title should read “Notice to Department of the Conveyance of Property.”

**Responses to Draft ERC Comments 1 through 8:** *Counsel for the Client will review the draft ERC comments provided by the IDEM and revise the ERC as appropriate. Counsel will contact the IDEM directly to discuss any issues that may arise.*

With the exception of the requested SMP and revised ERC, all IDEM RRWP comments have been addressed in reports submitted to the IDEM subsequent to the July 2024 letter. Rather than submitting an RRWP addendum, Polaris suggests summarizing activities to-date in a forthcoming Remediation Completion Report. If you have any questions or require further clarification, please contact the undersigned at your convenience.

Sincerely,

Polaris Environmental, LLC

*Steven M. Jessee*

Steven M. Jessee, LPG (IN1539)

Principal

cc: Ms. Jessica Reiss, Barnes & Thornburg, LLP