



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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December 17, 2024

Lacy Johnson
Taft Stettinius & Hollister, LLP
One Indiana Square, Suite 3500
Indianapolis, IN 46204-2023

Transmitted via Email

Michael O. Nelson
Nelson Law Group LLC
40 Minute Cleaners, Inc.
8777 Purdue Road, Suite 310
Indianapolis, IN 46268

Re: Soil Gas, 2024 Second Quarter Groundwater Monitoring, and Lines of Evidence
for Downgradient Sources Summary Letter
40 Minute Cleaners
3360 N. Illinois Street
Indianapolis, Indiana 46208
VRP # 6200702

Dear Mr. Johnson and Mr. Nelson:

The Indiana Department of Environmental Management (IDEM) has reviewed the Soil Gas, 2024 Second Quarter Groundwater Monitoring, and Lines of Evidence for Downgradient Sources Summary Letter (prepared by EnviroForensics [EFI], August 20, 2024) for the 40 Minute Cleaners site located at 3360 N. Illinois Street in Indianapolis, Indiana.

The report was uploaded to the IDEM Virtual File Cabinet (VFC) as document # 83686012. 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 consists of a 0.22-acre lot, which was formerly occupied by a commercial building. Dry cleaning operations occurred on-site from approximately 1970-2015. The western portion of the building historically operated as an automotive repair facility from approximately 1940-1980 and again from 2013-2016. Site release-related chemicals (RRCs) include tetrachloroethene (PCE) and its breakdown products trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE), and vinyl chloride (VC). The site is using Risk-based Closure Guide (R2) guidance.

Sewer backfill was sampled in July 2018. Further sewer investigation has not been required. Vapor intrusion (VI) sampling off-site has occurred at three residential structures (3320, 3324, and 3326 N. Illinois Street). The 3320 and 3324 N. Illinois Street residences have been sampled



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in winter and summer and do not need further sampling. The 3326 N. Illinois Street residence has refused installation of a vapor mitigation system (VMS) and should continue to be sampled if the property owner grants access. Soil gas delineation has not been completed. Quarterly groundwater monitoring of the entire well network is required to evaluate seasonal variation in the groundwater elevations, flow direction, and RRC concentrations. This information will enhance the conceptual site model (CSM) before submittal of the remediation work plan (RWP). Additional delineation is required downgradient of monitoring well MW-18.

The site building was demolished in 2020 as part of an interim remedial source area soil excavation. Approximately 310 tons of impacted soil in the source area were removed.

In February 2024, EFI sampled indoor air and sub-slab soil gas at 3338 N. Illinois Street for the winter worst case sampling event. In May 2024, EFI gauged and sampled the monitoring well network. Results were generally consistent with previous sampling events. EFI provided lines of evidence and historical data to discuss the potential for other properties contributing to this groundwater plume. EFI also installed and sampled soil gas monitoring points in May. Comments generated during the review of this report are summarized below.

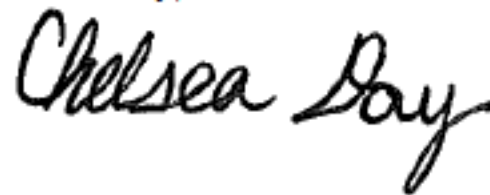
Comments

1. Additional data is required to rule out vertical migration as the cause of elevated concentrations in monitoring well MW-4I. Continued monitoring of this well cluster is required.
2. EFI concluded that the soil gas plume is limited to the area of the site and likely co-mingled with the soil gas plume to the east. The current data is not sufficient to support this conclusion due to the potential of PCE migration. As shown in Figure 9 (dotted line), the extents of the soil gas plume are not defined to the north of monitoring point SG-14S/D east of monitoring points SG-14S/D and SG-15 S/D, southeast of monitoring points SG-15S/D and SG-16S/D, and south of monitoring point SG-16S/D. Additional investigation is required.
3. EFI must submit a soil gas monitoring plan for the installed soil gas points.
4. EFI recommends suspension of groundwater monitoring. IDEM does not concur that suspension is appropriate and requires continued quarterly monitoring of the well network. IDEM will allow the submittal of an annual groundwater sampling report.
5. EFI recommends the submittal of a RWP. IDEM does not concur. The site is not delineated. In addition, RWP submittal is premature due to the suspected presence of other contributors. These parties must be allowed adequate time to gather data and determine which site is responsible for the delineated extents of impacts before the 40 Minute Cleaners site can be allowed to pursue RWP approval and subsequent closure.
 - a. EFI recommended submittal of the RWP under the Remediation Closure Guide. This is not acceptable. The site would be required to submit the RWP under Risk-based Closure Guide (R2) guidance once RWP submittal is recommended by IDEM per Part II Special Technical Conditions of the Voluntary Remediation Agreement, Compliance with Guidance Documents.
6. VRP has forwarded this report to the State Cleanup Gatekeeper. VRP will inform the site if State Cleanup requests additional data or accepts the data and generates site numbers for the potential contributor(s).
7. IDEM notes discussion of 438 $\mu\text{g}/\text{m}^3$ of ethylbenzene at monitoring point SG-15D was included in the narrative and laboratory report but not on the tables or figures. Elevated detections such as this must be included in both tables and figures.

8. Vapor intrusion sampling was completed at 3338 N. Illinois Street in February and summer 2024. The summer 2024 results will be submitted under separate cover. This is acceptable.
 - a. New indoor air and sub-slab results from the February 5-6 sampling event at 3338 N. Illinois Street were not added to Figure 4. This figure needs to be amended in the future to include this data point.

Please respond within 180 days from the receipt of this letter with a soil gas monitoring plan and a further site investigation work plan for soil gas. Please respond within 365 days from the receipt of this letter with an annual groundwater monitoring report. EFI 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.

Sincerely,



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

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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).