



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mike Braun
Governor

Clint Woods
Commissioner

August 11, 2025

Josh Parker and Jeff Kingsbury
Broadway Redevelopment Partners, LLC
RTM Ventures, LLC
EW West Campus Landlord, LLC
701 W. Main Street, Suite 200
Durham, NC 27701

Transmitted via Email

Re: Groundwater Monitoring Report—4th Quarter 2024 and 1st Quarter 2025 Monitoring Events
Electric Works
1701 College Street
Fort Wayne, Indiana 46802
VRP # 6180801

Dear Mr. Parker and Mr. Kingsbury:

The Indiana Department of Environmental Management (IDEM) has reviewed the Groundwater Monitoring Report—4th Quarter 2024 and 1st Quarter 2025 Monitoring Events (prepared by Verdantas LLC [Verdantas], June 16, 2025) for the Electric Works site located at 1701 College Street in Fort Wayne, Indiana.

The report was uploaded to the IDEM Virtual File Cabinet (VFC) as document # 83821703. 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 West General Electric (GE) Campus is 23 acres and was developed for industrial use in the late 1800s and was purchased by General Electric Company (GE) in 1885 for use as a motor and electrical transformer manufacturing facility. Only 7 buildings of the original 31 remain. Many were deconstructed and replaced with larger buildings. Manufacturing operations ceased in 2015; the site is currently undergoing redevelopment as a large mixed-use complex incorporating commercial space, medical facilities, retail use, an educational building, parking, and greenspace. Previous environmental work at the site was associated with Resource Conservation and Recovery Act (RCRA) activities for a former drum storage area on the West Campus, as well as Phase II Environmental Site Assessment activities on both the East and West Campuses.

New owners (RTM Ventures and Broadway Redevelopment Partners [BRP]) purchased the property from GE in 2017. The site was accepted into the Voluntary Remediation Program (VRP) in March 2019. Contaminants of concern (COCs) include volatile organic compounds (VOCs) and RCRA metals.

Soil contamination is on-site only. Trichloroethylene (TCE) contamination is in the vicinity of the former aboveground storage tank (AST). Groundwater impacts on-site and off-site exceed groundwater vapor intrusion screening levels (GW VISLs). On-site buildings were sampled for

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vapor intrusion and required mitigation. Off-site vapor intrusion does not pose any risks. The sewer on Nelson Street is not a preferential pathway.

The approved Remediation Work Plan (RWP) proposes to address direct contact with soil and groundwater, on-site vapor intrusion, and ingestion of groundwater on-site and off-site. Remedies include institutional controls with a soil management plan (SMP) to address on-site soil and groundwater, active sub-slab depressurization systems (SSDSs) in on-site buildings to address vapor intrusion (VI), institutional controls and/or an Environmental Restrictive Ordinance (ERO) to address on-site and off-site groundwater, and a plume stability demonstration. The site is using 2018 Remediation Closure Guide (RCG) screening levels for closure.

In November 2024 and February 2025, Verdantas gauged and sampled select wells. Monitoring wells MW-05RB and MW-16RA were installed and wells MW-05R and MW-16 were abandoned in October 2024 per IDEM approval. Comments generated during the review of this monitoring report are summarized below.

Comments

1. Verdantas proposed to prepare a plume stability demonstration. This is appropriate. The proposed iterative plume stability demonstration is acceptable.
 - a. Verdantas must discuss monitoring wells that have not been able to yield consistent samples due to insufficient groundwater or access.
 - b. The approved RWP proposed the use of an ERO to enable closure. Verdantas should discuss with IDEM if the City of Fort Wayne continues to be committed to the implementation of an ERO or if off-site institutional controls must be pursued.
 - c. IDEM recommends that Verdantas, in addition to the plume stability demonstration, prepare a summary of tasks completed per the approved RWP and tasks that have yet to be completed.
2. Verdantas did not propose additional groundwater monitoring. This is not acceptable. Verdantas must continue sampling groundwater. A groundwater monitoring plan must be prepared, or Verdantas must continue sampling per the approved schedule.
3. Well MW-124R has historically been inaccessible and is required to evaluate the extent of the plume. IDEM recommends that Verdantas develop a plan to sample an alternative monitoring well on occasions that this well is inaccessible.
4. Well MW-16RA contained insufficient groundwater. IDEM recommends that Verdantas develop a plan to sample an alternative monitoring well on occasions that well MW-16RA contains insufficient groundwater.

Please respond within 90 days from the receipt of this letter with a plume stability report and a groundwater monitoring plan. Verdantas 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

cc: Valerie Gill, Verdantas; VGill@verdantas.com
Philip Storch, Ancora; PStorch@ancora.re
Nicole Morrill, Ancora; NMorrill@ancora.re
Chris Myer, IDEM RCRA Corrective Action Section; CMyer@idem.in.gov

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 OLO 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).