

**Eli Lilly and Company
Lilly Corporate Center
Indianapolis, IN 46285
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March 24, 2026

Ms. Nawal Hopkins
Senior Environmental Manager
IDEM Office of Land Quality
100 N. Senate Avenue
Indianapolis, IN 46204

RE: Eli Lilly Aviation Facility, 2800 South High School Rd., Indianapolis
Facility ID #16446

Dear Ms. Hopkins:

Eli Lilly and Company (Lilly) received a Notice of Deficiency (NOD) dated March 12, 2026 from the Indiana Department of Environmental Management (IDEM) concerning the UST System Closure at the Eli Lilly Aviation facility. The NOD indicated the following items need to be addressed:

2201 – Closure – Sample Results – Soil sampling data missing or not in tabular format. Only one soil sample was done per boring. Per the closure rule a minimum of two (2) soil samples are required for each boring.

Response:

The IDEM received an Underground Storage Tank (UST) Thirty (30) Day Notification of Intent to Close (Closure Notification) for the facility referenced above on December 16, 2024. In the Closure Notification, the sampling plan—conditionally approved by IDEM in a letter dated January 8, 2025—indicated that two samples would be collected per borehole. However, due to the proximity of above-ground and underground piping near the 550-gallon unleaded gasoline UST and the inability to collect representative samples, the assigned IDEM UST closure manager, Ms. Lauren Welch, in consultation with Ms. Nawal Hopkins, approved an alternative sampling approach for in-place closure, as outlined in a February 26, 2025 email exchange between IDEM and Lilly’s environmental consultant, ERM (see Attachment A).

Additionally, details of the alternative sampling approach requested and subsequently approved by IDEM, which included collection of one soil sample per boring location, are noted within Section 6.4 of Eli Lilly’s *Initial Site Characterization Report* (VFC document #83797349) as follows:

“Due to the proximity of the above-ground piping, subsurface piping, and nearby USTs, Lilly was only able to drill two borings directly to the northwest (B-1) and south (B-2) within three feet of the 550-gallon UST. ERM was not able to place borings directly north (above UST) or east (to the right) within three feet of the UST as proposed within the Site Assessment Work Plan (December 9, 2024) submitted within Lilly’s Thirty (30) Day Notification of Intent to Close. Details of the necessary scope change were communicated to IDEM (Lauren Welch – Environmental Manager) on February 5, 2025, prior to initiating sampling activities the following day. Four additional borings (B-3 through B-6) were drilled along the UST dispenser piping during the February mobilization.

Approximately three weeks after the February In-place Closure sampling was completed, IDEM requested additional site assessment sampling in an email to ERM and Lilly, dated February 26th, 2025. Considering above ground and underground utilities near the UST, IDEM requested three additional step-out boring locations to collect soil and groundwater to the west, south, and east of the 550-gallon UST, which included proposed locations for these samples. ERM and Lilly provided an overview of the proposed scope of work for the ISC investigation to IDEM (Joshua Sneed) during a March 17, 2025 conference call and subsequent March 18th, 2025 email. IDEM approved the proposed ISC scope of work within a March 19th, 2025 response email.”

As indicated in Figure 1 of the UST Closure Report submitted to the IDEM on February 2, 2026, soil borings identified as B8 (west), B9 (south), and B10 (east) were performed to complete IDEM’s field sampling request. All collected samples from the locations showed no detection of unleaded gasoline contaminants. Additionally, all groundwater samples were non-detect for all VOCs. Based on these results, the sampling approach that was approved by IDEM is sufficient to demonstrate that there has been no release of regulated constituents and that closure of the UST should be approved.

Lilly assumes this response provides the sufficient information needed to proceed with completing the in-place UST system closure process. Please contact Brian Griesemer at (317) 276-2775 or at griesemerbp@lilly.com if further discussion is necessary.

Sincerely,

Eli Lilly and Company



Daniel C. Charles, CIH, CSP
Associate Director – Indianapolis Environmental Services

cc: Todd Cavender, IAA Director of Environment and Sustainability
Brian Griesemer, PE – Eli Lilly and Company



Attachment A: Email correspondence Between ERM and IDEM

From: [Welch, Lauren](#)
To: [Andrew Wallace](#)
Cc: [Brian Patrick Griesemer](#); [Blake Swenson](#); [HOPKINS, NAWAL](#)
Subject: [EXTERNAL] RE: Proposed Call RE: Site Assessment Scope Adjustment - Eli Lilly (FID #16446)
Date: Wednesday, February 26, 2025 1:22:02 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image010.png](#)
[Lilly WP potential sampling locations.pdf](#)

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Hi Andy,

Apologies for the delay in response. I've spoken with Nawal, another closure coordinator who I've cc'd, and since this is an in-place closure, there is no waiver able to be given for sampling. I understand the difficulties you faced while on-site trying to sample, but we do need you to go back out and get three (3) more soil/water samples in the cardinal directions you missed (W, S, E). This does not have to be done directly next to the tank (as that is not possible) but I've marked up the work plan figure (red circles on the first page) with *potential* locations you could sample, to give you an idea. If there are any questions feel free to reach out.

Thanks,



Indiana Department of
Environmental Management

Lauren Welch
Environmental Manager

• (317) 234-0154 • lwelch@idem.IN.gov

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IDEM values your feedback



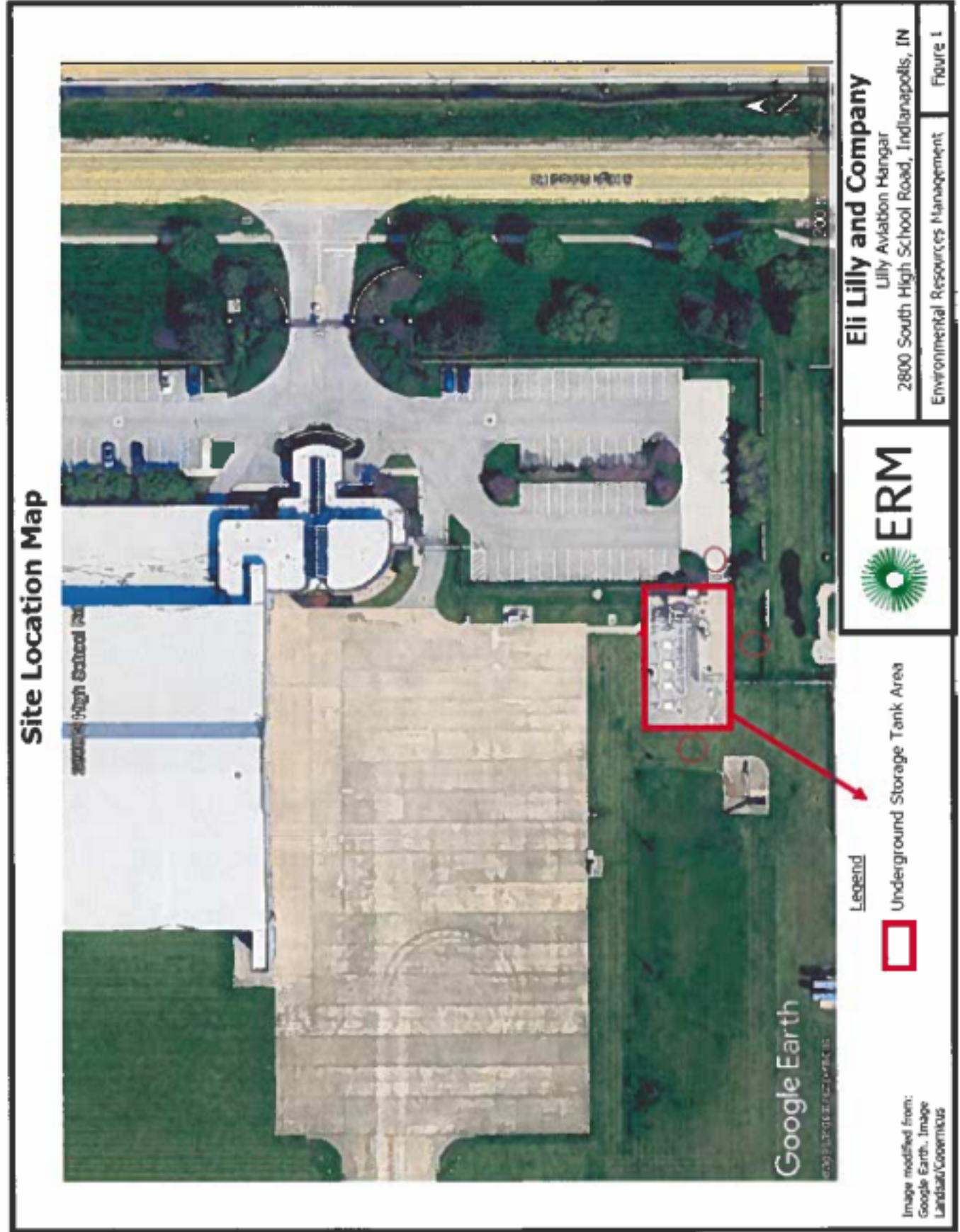
From: Andrew Wallace <andrew.wallace@erm.com>

Lilly



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Jordan, Sherry

From: Brian Patrick Griesemer <griesemer_brian_patrick@lilly.com >
Sent: Tuesday, March 31, 2026 9:10 AM
To: IDEM USTRegistration
Subject: RE: Closure FID #16446
Attachments: NOD Response 03-24-26 Signed.pdf

Categories: Orange category

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Please see attached response to the IDEM's March 12, 2026 NOD letter concerning the UST Closure report concerning #16446.

Best regards

Brian Griesemer, PE



Eli Lilly and Company

Lilly Technology Center, (LTC) 1555 Harding St., Indianapolis, IN, 46221
Office: 317 276-2775 Mobile: 317 220-5485
Email: griesemerbp@lilly.com

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From: Brian Patrick Griesemer
Sent: Monday, February 2, 2026 11:22 AM
To: USTRegistration@idem.in.gov
Subject: Closure FID #16446

Please see attached closure documentation.

Brian Griesemer, PE



Eli Lilly and Company

Lilly Technology Center, (LTC) 1555 Harding St., Indianapolis, IN, 46221
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