



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 26, 2024

VIA EMAIL

Mr. Richard McBroom
McBroom Electric Co, Inc.
800 West 16th Street
Indianapolis, IN 46202

Re: **Fourth Quarter 2023 Groundwater Monitoring Report &
Winter 2023-2024 Vapor Intrusion Sampling**

McBroom Electric
800 West 16th Street
Indianapolis, Marion County
State Cleanup Site #0000753

Dear Mr. McBroom:

The Indiana Department of Environmental Management (IDEM) has reviewed the file pertaining to a release(s) of hazardous substances at the McBroom Electric facility located at 800 West 16th Street, Indianapolis, Indiana (Site). Specifically, the following documents, prepared and submitted by Wilcox Environmental Engineering, Inc. (Wilcox) were reviewed:

- *Fourth Quarter 2023 Groundwater Monitoring Report (QMR)*, dated May 29, 2024, IDEM's Virtual File Cabinet (VFC) (available at <https://vfc.idem.in.gov>) Content ID #[83649587](#); and,
- *Winter 2023-2024 Vapor Intrusion Sampling (VI Report)*, dated May 29, 2024, IDEM's VFC Content ID #[83649548](#).

The documents were evaluated based on IDEM's *Risk-based Closure Guide* ("RCG" or "R2") and *State Cleanup Program Guide* non-rule policy documents and *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW846) Third Edition, Update III. Non-rule policy documents are located at: <https://www.in.gov/idem/resources/nonrule-policies/effective-nonrule-policies/>. Based on the data submitted, additional vapor intrusion sampling and groundwater sampling must be conducted and reports must be submitted to IDEM for review. The following IDEM comments must be addressed as applicable:



Visit on.IN.gov/survey or scan the QR code to provide feedback.

We appreciate your input!



Comments

1. Concentrations of trichloroethene (TCE) in sub-slab soil gas samples exceeded 10 times the commercial published level, while concentrations in indoor air were below the published level. According to [Table 3-B](#) of the R2, the building falls into Scenario 3, indicating that a remedy or indefinite sampling is warranted. Wilcox plans to conduct summer worst-case vapor intrusion sampling, which is acceptable.
2. Wilcox also plans to continue quarterly groundwater monitoring, including sampling of the newly installed monitoring well (MW-8), which is acceptable.
3. The Level II elements (i.e., minimum data documentation requirements (MDDR)), except for the matrix spike/matrix spike duplicate (MS/MSD) provided with collected groundwater samples were adequate in supporting the results and usable for quarterly monitoring. The MS/MSD were not performed and, therefore, the matrix interference cannot be assessed and the results for TCE, chloroform, and 1,1,1-trichloroethane are considered estimated. When future groundwater monitoring reports are prepared, the laboratory reports must be submitted with quality assurance/quality control (QA/QC) documentation which meets the R2 Level II elements (MDDR), as described in [Table 2-B](#) of the R2.

Conclusions

The proposed summer worst-case vapor intrusion sampling event, and continuation of quarterly groundwater monitoring should be completed as planned. Wilcox should ensure that the MDDR are met for future groundwater sampling events.

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the next quarterly groundwater monitoring report and summer vapor intrusion assessment to IDEM within 30 days of receiving relevant lab data.

To reduce paper usage, reports are required to be submitted via **State Cleanup's e-Submission Portal (ESP)**. Paper copies are no longer required or accepted; however, paper copies of figures and tables may be requested by the Project Manager.

To request access to the ESP, complete State Agency Form 57103, available on IDEM's website at idem.in.gov/mysubmission. Please note that the size limit for an electronic document remains at 75 megabytes (MB) per IDEM Office of Land Quality electronic document submittal guidelines, which are available online at: www.in.gov/idem/landquality/2368.htm.

If you have any questions or comments concerning this matter, please contact me by phone at (317) 234-1957 or by email at chaulter@idem.in.gov, or you may call IDEM's toll free number at (800) 451-6027 and ask for Crystal Haulter.

Sincerely,



Crystal Haulter
State Cleanup Section
Office of Land Quality

cc: IDEM Site #0000753

John Pritchard, Esq., IDEM Office of Legal Counsel
David Guevara, Ph.D., Esq., Taft Stettinius & Hollister LLP
Scott Stoldt, Wilcox Environmental Engineering, Inc.
Jozef Pichtel, Wilcox Environmental Engineering, Inc.
Marion County Public Health Department

If a technical dispute arises and cannot be resolved in a timely manner, please see IDEM's website for information about appealing technical decisions through the Office of Land Quality's Technical Review Panel pilot program at: www.in.gov/idem/cleanups/2370.htm.