



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 25, 2024

Susan Merkley
George Merkley
Jennifer Merkley
3655 East Schnellville
Saint Anthony, Indiana 47575

Rodney L. Mullins
Registered Agent
Mullins Supply, Incorporated
9292 North Pine Bluff Road
Bicknell, Indiana 47512-9666

Re: **No Further Action**
Gossard Building
108 North Franklin Street
Bicknell, Knox County
State Cleanup Site #7100140

Dear Merkleys and Mr. Mullins:

The Indiana Department of Environmental Management (IDEM) reviewed the file pertaining to a release of hazardous substances at the Gossard Building located at 108 North Franklin Street, Bicknell, Knox County, Indiana (Site) in accordance with IDEM's *Remediation or Risk-based Closure Guide (RCG)* and *State Cleanup Program Guide* nonrule policy documents and *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW846)* Third Edition, Update III. A copy of the public file for the Site will be maintained on IDEM's Virtual File Cabinet (VFC), under Site #7100140, which can be accessed online at <https://vfc.idem.in.gov/>.

Environmental Management Consultant (EMC), on behalf of the parties named above, has requested that a "No Further Action" status be granted for State Cleanup Site number #7100140.

The facility operated as Custom Circuit Craft Inc. from approximately 1983 through 2003. The Town of Bicknell owned the property and leased the property to Custom Circuit Craft Inc. during its period of operations at the property. In 2004, the Town of Bicknell notified the Indiana Department of Environmental Management (IDEM) of waste abandoned on the property by Custom Circuit Craft, Inc. IDEM completed a removal action at the property in 2007, removing the free product waste.



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

We appreciate your input!



No additional action was taken by IDEM at the property until such time that a Notice of Liability Letter dated October 26, 2021, was sent to the current and former owners of the property including Susan Merkley, George Merkley, Jennifer Merkley (Merkleys), and Mullins Supply, Incorporated (Mullins). Mullins purchased the property from the Town of Bicknell in December 2012 and subsequently conveyed the property the Merkleys in August 2020. The Notice of Liability was issued notifying these entities of potential environmental liability as Potentially Responsible Persons (PRPs) based on historic ownership by Mullins and current property ownership by the Merkleys.

An Initial Site Investigation (ISI) Work Plan and a Quality Assurance Project Plan (QAPP) were approved by the IDEM on March 20, 2023. The ISI was implemented in April 2023. On April 24, 2023, four exterior soil borings were advanced at the property and three soil borings were completed in the interior of the building. The exterior soil borings were advanced using a Direct-Push Dual Tube Sampling System. The interior soil borings were performed by coring the concrete and advancing the soil borings using a hand auger. One soil sample was collected from each boring (seven total soil samples) and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), Resource Conservation and Recovery Act (RCRA) metals, other metals (nickel, copper, and zinc), hexavalent chromium, and cyanide. No contaminants of concern were detected in soil at concentrations exceeding the IDEM Published Levels except for arsenic, detected at a concentration of 11 milligrams per kilogram (mg/kg), which exceeds the IDEM Soil Long Term Residential Published Level. This concentration is consistent with background arsenic concentrations in Knox County.

Four groundwater monitoring wells were installed by over-boring the exterior soil borings and finishing those borings as monitoring wells. Groundwater collected from the wells was sampled on April 27, 2023. Two of the wells were dry. Groundwater samples were analyzed for VOCs, SVOCs, total RCRA metals, dissolved RCRA Metals, total other metals (nickel, copper, and zinc), dissolved other metals (nickel, copper, and zinc), hexavalent chromium, and cyanide. No contaminants of concern were detected in the groundwater at concentrations exceeding the IDEM Published Levels.

Based on the technical reports reviewed by IDEM, current use of the Site, IDEM concludes that no further response actions are required. If additional information is subsequently obtained by IDEM indicating that the Site poses a risk to human health or the environment, including information about a land use inconsistent with the conditions, IDEM reserves the right to modify or change the no further action determination as the situation may warrant.

Monitoring wells and/or piezometers are no longer necessary to monitor the groundwater quality or groundwater levels and must be permanently abandoned by a licensed Indiana water well driller in accordance with 312 Indiana Administrative Code (IAC) 13-10-2.

No Further Action
Gossard Building Site
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This NFA determination is an agency determination of status pursuant to Indiana Code (IC) 4-21.5-3-5. Should you have questions, or to notify IDEM of a change in Site conditions, please contact Kenneth C. McDaniel at 317-691-6370 or kmcdanie@idem.in.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. L. Groves", with a long horizontal flourish extending to the right.

Ryan L. Groves, Chief
State Cleanup Section
Office of Land Quality

RLG:PM

ec: State Cleanup File #7100140
Monica Edwards, KDDK, LLP
Roger Cohen, Environmental Management Consultants

For procedures to appeal this Agency decision, see the Office of Environmental Adjudication Guide to Administrative Appeals webpage at: <https://www.in.gov/oea/guide-to-appeals-process/>.