



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
Governor

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Commissioner

June 18, 2024

## VIA EMAIL

Emmanuel Missionary Baptist Church, Inc.  
c/o Michael Nelson  
Nelson Law Group LLC  
8777 Purdue Road, Suite 310  
Indianapolis, IN 46268

Ms. Joan Miller, Du Mil, Inc. d/b/a Terry's 40 Minute Cleaners  
c/o Joseph Maguire  
Norris Choplin Schroeder LLP  
101 West Ohio Street, Ninth floor  
Indianapolis IN 46204-4213

### Re: **1<sup>st</sup> Quarter 2024 Groundwater Sampling Report**

Emmanuel Missionary Baptist Church  
3036 North Sherman Drive  
Indianapolis, Marion County  
State Cleanup Site: #0000441

Dear Emmanuel Missionary Baptist Church, Inc. and Ms. Joan Miller:

The Indiana Department of Environmental Management (IDEM) has reviewed the *First Quarter 2024 Groundwater Sampling Report* (Q1 2024 GMR) dated April 12, 2024, prepared and submitted by AP Engineering & Consulting (APEC). The Q1 2024 GMR was submitted in response to a release(s) of hazardous substances at the Emmanuel Missionary Baptist Church located at 3036 North Sherman Drive, Indianapolis, Marion County (Site). The Q1 2024 GMR is available in IDEM's Virtual File Cabinet (VFC) as document [#83628249](#). The VFC is located on IDEM's website at <https://vfc.idem.in.gov/>.

The document was 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, IDEM has the following comments which must be incorporated into future groundwater sampling reports:



Visit [on.IN.gov/survey](https://on.IN.gov/survey) or scan the QR code to provide feedback.

*We appreciate your input!*



## Comments

1. Monitoring wells (MW)-1 to MW-15 were sampled in March 2024. Groundwater samples were collected and analyzed for volatile organic compounds (VOCs) using Environmental Protection Agency (EPA) Method 8260. The sampling and analytical methods used were acceptable.
2. Groundwater ranged from 12.02 to 20.35 feet below grade (ft-bg) (Table 2) and the flow was south-southwest, consistent with previous observations. Groundwater analytical data from the network of 16 monitoring wells confirm reductive dechlorination of perchloroethylene (PCE) is occurring in four wells. The concentrations of PCE (30 parts per billion (ppb)) in one well; trichloroethylene (TCE) (7 ppb and 50 ppb) in two wells; 1,2-dichloroethane (DCE) (769 ppb to 8,100 ppb) in three wells; and vinyl chloride (VC) (3 ppb to 5,670 ppb) in five wells exceeded their respective published levels (PLs) (Table 3). In addition, naphthalene in one well and trimethylbenzenes (TMBs) in two wells exceeded the PLs. The release-related chemicals (RRCs) in the samples taken from the remaining 10 wells did not exceed the PLs.
3. The laboratory reports were submitted with quality assurance/quality control (QA/QC) documentation which met the R2 Level II minimum data documentation requirements (MDDRs). A groundwater field duplicate was collected from MW-7 and the results compared well. The VOC results from the trip blank sample were non-detect. Matrix spike samples were not collected in the sampling event. Therefore, groundwater results are estimated. Future sampling events must include appropriate matrix spike/matrix spike duplicate (MS/MSD) samples. The IDEM QA/QC documentation requirements can be found in Section 2.2.9 Table 2-B of the R2.
4. The Remediation Work Plan (RWP) was approved in May 2023. Remedial injections are planned for the 3<sup>rd</sup> quarter of 2024. The consultant proposes to continue conducting quarterly groundwater monitoring. This is acceptable to IDEM.

## Conclusions

To treat and reduce the VOCs in soil and groundwater, APEC plans to implement the approved RWP during the 3<sup>rd</sup> quarter of 2024. Quarterly groundwater monitoring will continue throughout 2024 and following implementation of the selected remedies. To further evaluate the remedy's effectiveness, APEC plans to conduct post-injection groundwater monitoring events. This is acceptable to IDEM.

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the next groundwater quarterly monitoring report within the next 60 days.

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/myesubmission](http://idem.in.gov/myesubmission). 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](http://www.in.gov/idem/landquality/2368.htm).

If you have any questions or comments concerning this matter, please contact me by phone at 317-232-2667 or by email at [nkayden@idem.IN.gov](mailto:nkayden@idem.IN.gov), or you may call IDEM's toll free number at (800) 451-6027 and ask for Ms. Nora Kayden.

Sincerely,

*Nora Kayden*

Nora Kayden  
State Cleanup Section  
Office of Land Quality

cc: IDEM Site #0000441  
Mr. Cameron Abbott, CHMM, APEC  
Marion County 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](http://www.in.gov/idem/cleanups/2370.htm).