



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

July 2, 2024

Michael F. Dreyer, Registered Agent  
Dreyer Investment, LLC  
4170 West Washington Street  
Indianapolis, Indiana 46241

**Re: Project Status Update**

Dreyer Investment Site  
(Former Dady Laundry)  
4170 West Washington Street  
Indianapolis, Marion County  
State Cleanup Site #0000474

Dear Mr. Dreyer:

The Indiana Department of Environmental Management (IDEM) has reviewed the document titled *Project Status Update, Former Dady Laundry, 4170 West Washington Street, Indianapolis, Indiana, IDEM State Cleanup #0000474, February 20, 2024* (Status Update), prepared and submitted by St. John-Mittelhauser and Associates, a Terracon Company (SM&A). The Status Update was submitted in response to a release(s) of hazardous substances at the Dreyer Investment Site located at 4170 West Washington Street, Indianapolis, Marion County, Indiana (Site). The Status Update is available in IDEM's Virtual File Cabinet (VFC) as document #83644905. 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* nonrule policy documents and *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW846) Third Edition, Update III. Based on the data submitted, it is possible that the on-site building may be impacted by vapor intrusion (VI). The following comments must be addressed.

**Comments:**

1. Off-site, chlorinated volatile organic chemicals (cVOC)s extend to the southeast in groundwater to a residential neighborhood where municipal water is not fully available. A remedy is required for the off-site groundwater exposure scenario to the southeast. The document states the water main extension along Lyons Avenue and Rybolt Avenue was approved by Citizens Energy in January 2024. The targeted start of construction in the second quarter of 2024.
2. In April, three shallow soil gas samples were collected along the eastern perimeter of the building and the historical sewer backfill. Soil gas (SG)-1 had a tetrachloroethylene



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(PCE) concentration of 1,840 milligrams (ug)/ cubic meter (m<sup>3</sup>) which exceeds the residential shallow soil gas published levels (SGPL) of 400 ug/m<sup>3</sup> and is close to the commercial SGPL of 2,000 ug/m<sup>3</sup>. The soil gas results verify that elevated soil gas is present near the building. Soil gas is known to build up under slab foundations and cVOC vapor concentrations could be higher under the slab. Therefore, a paired vapor sampling of sub-slab/indoor air (IA) is warranted in winter and summer conditions for the on-site building.

3. In the response to the January 17, 2024, IDEM Comment Letter, VFC document number 83583803, requesting the depth of the sanitary sewer line south of the site, the consultant states there are no known sanitary sewer lines installed immediately south of the site. Figure 5 does show a sanitary sewer intersecting the plume south of the site. The conduit is not likely to be as deep as groundwater; however, this must be confirmed.
4. Even though a groundwater field duplicate sample was collected, the location was not identified. Based on analytical results, the field duplicate sample was likely collected from MW-4. The location of field duplicate samples must be identified to allow for comparison of analytical results which assess consistency in sample acquisition procedures. The laboratory reports were submitted with quality assurance (QA)/quality control (QC) documentation which met the R2 Level II elements (minimum data documentation requirements (MDDRs)). Analytical results can be used for the intended purpose of quarterly monitoring.

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the next quarterly progress report to IDEM within 90 days of the date of this letter via the State Cleanup e-Submission Portal (ESP).

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 at (317) 691-6370, or you may call IDEM's toll free number at (800) 451-6027 and ask for Kenneth C. McDaniel.

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).

Sincerely,

*Kenneth C. McDaniel*

This document was signed electronically

Kenneth C. McDaniel  
State Cleanup Section  
Office of Land Quality

KCM:

cc: IDEM Site #0000474

cc: Dr. Perre Burns, P.E. St. John-Mittelhauser and Associates, Suite 190, 8435 North Keystone Crossing, Indianapolis, Indiana 46240

Ms. Kathryn A. Watson, Katz Korin Cunningham, 334 North Senate Avenue, Indianapolis, Indiana 46204

Marion County Public Health Department, 4040 North Rural Street Indianapolis, Indiana 46205