



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 19, 2024

VIA EMAIL

Mr. John O'Neal
O'Neal's Clothes Depot Cleaners
c/o Mr. David L. Gueverra
Taft, Stettinus and Hollister, LLP
One Indiana Square
Suite 3500
Indianapolis, IN 46204
Email: johnmonk1937@yahoo.com
c/o Email: dguevarra@taftlaw.com

Re: **Response to IDEM Comments & Comprehensive Plume Behavior Analysis**

O'Neal's Clothes Depot Cleaners
833 East Morgan Street
Martinsville, Morgan County
State Cleanup Site #0000402

Dear Mr. O'Neal:

The Indiana Department of Environmental Management (IDEM) has reviewed the *Response to IDEM Comments and Comprehensive Plume Behavior Analysis* (Response to Comments), prepared and submitted by Wilcox Environmental Consulting. The Response to Comments were submitted in response to a release(s) of hazardous substances at the O'Neal's Clothes Depot Cleaners located at 833 East Morgan Street, Martinsville, Indiana (Site). The Response to Comments is available in IDEM's Virtual File Cabinet (VFC) as document # [83632235](#). 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, additional ground water monitoring will be required. The following IDEM comments must be addressed in the next report submitted to IDEM:



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

We appreciate your input!



Comments

1. In order to address the questions regarding plume stability, Wilcox has proposed to conduct an additional three quarters of sampling on the six wells located downgradient of the westernmost Permeable Reactive Barrier (PRB), this is acceptable.
2. Additionally, Wilcox is in the process of obtaining access to 490 and 809 E. Washington Street for VI sampling. IDEM recognizes the attempts made by Wilcox made to obtain access to both the 490 East Washington Street and 809 East Street properties. IDEM will conduct some additional outreach and provide updates where possible.

Comments pertaining specifically to the ERO request:

3. There are two properties not provided with city water (690 E Washington St and 90 S Ohio St) and Wilcox intends to visit those properties during the upcoming sampling events to confirm their drinking water status.
4. Following confirmation that there are no wells at 690 E Washington St and 90 S Ohio St, and contingent upon a satisfactory demonstration of plume stability Ordinance #2021-0020 can be relied upon to prevent groundwater exposure. Since it has been confirmed that the parcels outside of the 2021-0020 boundary are supplied with municipal water, and since Ordinance #2020-0008 restricts future wells, Ordinance #2020-0008 may also be used as an extra measure to prevent groundwater exposure for the parcels outside of the 2021-0020 boundary. If plume expansion occurs or is likely to occur, then an updated list of affected parcels and their drinking water statuses will be needed.

Conclusions

Wilcox will conduct additional sampling to assess plume stability. Both Wilcox and IDEM will make additional efforts to obtain access for VI sampling at both 490 & 809 E. Washington Street. Wilcox will confirm drinking water status at two properties (690 E Washington St and 9-S Ohio St) during upcoming sampling events. Finally, once well confirmation and plume stability are established, Ordinances #2021-0020 and #2020-0008 can be used to prevent groundwater exposure, considering municipal water supply and well restrictions.

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the next groundwater monitoring report to IDEM within 90 days of the date of this letter.

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. 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 317-233-0131 or by email at hhuntley@idem.in.gov, or you may call IDEM's toll free number at (800) 451-6027 and ask for Hayley Huntley.

Sincerely,



Hayley Huntley
State Cleanup Section
Office of Land Quality

cc: IDEM Site #0000402

Greg Alfrey, Wilcox Environmental Engineering, Inc., email: galfrey@wilcoxenv.com

Morgan County Health Department, email: Morgan@isdh.IN.gov

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.