



Stantec Consulting Services Inc.
5778 West 74th Street
Indianapolis IN 46278-1754

June 28, 2024

Project/File: UTA - Andrews

Mr. Jeffery Kavanaugh

Senior Environmental Manager
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204

Reference: UTA – Andrews VRP6930702 - Remediation Work Plan Addendum 2

Dear Mr. Jeffery Kavanaugh,

On June 13, 2024, a conference call related to the captioned VRP project was attended by representatives of IDEM (Kevin Davis, Jeff Kavanaugh, and Bill Holland), Stantec (John McInnes and Susan Hall), and RTX (Beth Lang). During this conference call, RTX provided an update of activities related to the VRP project and a summary of ongoing multi-party efforts in pursuit of a regional alternative to the Andrews water supply. The intent of this letter is to summarize the content of the June 13, 2024, conference call and confirm extension of the due date for revision of the RWP Addendum 2 until after matters related to the alternative water supply are resolved (estimated to be approximately 60 days).

The following is a summary of the topics discussed during the June 13, 2024, meeting, and the rationale for further revising the due date for response to the August 17, 2023, IDEM letter.

Routine System Operations and Monitoring Update

- The precautionary Town Air Stripper continues to operate as designed and has maintained over 99.9% uptime during the past 12 months. The influent to this system remains below the MCL for all VOCs and the effluent/finished water likewise continues to be below the MCL as it has been in all past sampling events. The monitoring results and system operation summary continue to be submitted to IDEM quarterly.
- As proposed in the RWP Addendum 2, designs for upgrades to the Town Air Stripper were submitted to the Town of Andrews on April 6, 2023, for their review prior to the submittal of the IDEM permit application. The design is currently awaiting approval by the Town. In the meantime, the new air stripper was purchased and has been available for installation since April 2023.
- The Site boundary pump and treat system (containment system) continues to be operated as designed. As demonstrated in the quarterly reports, the system consistently maintains capture of the area of highest groundwater concentrations on site and is operated in compliance with its NPDES permit. The monitoring results and analysis of system operations continue to be submitted to IDEM quarterly.
- VI mitigation systems in 9 structures continue to be operated and monitored as specified in the *RWP Addendum 2 – Appendix J – 2019-2022 Vapor Intrusion Update* (VFC #83377126 and #83380132). Monitoring results are mailed directly to the structure owners and IDEM following each sampling event.

Reference: Remediation Work Plan Addendum 2

Groundwater Monitoring and VI Monitoring and Reporting Update

- Groundwater monitoring continues to be performed as specified in the March 9, 2017, *Proposed Monitoring Well Network* letter (VFC #80610015) with additional sampling conducted as specified in the June 26, 2019, *Pilot Study Work Plan for Implementation of Enhanced In Situ Bioremediation* (VFC #83011893) and the September 12, 2022 *RWP Addendum 2 – Appendix C – Interim Report – Enhanced In Situ Bioremediation Pilot Study* (VFC #83379601 and #83379592). Groundwater monitoring results are submitted to IDEM in quarterly reports.
- VI monitoring continues to be performed as specified in the September 12, 2022, *2019-2022 Vapor Intrusion Update* (VFC #83377126) and the September 12, 2022, *RWP Addendum 2* (VFC #83380132). VI monitoring results are submitted to IDEM and property owners in results letters.
- Reports submitted to IDEM since submittal of the RWP Addendum 2 are listed in Attachment A.

Property Access Support

- As discussed on June 13th, Stantec and RTX have been working to gain access to the former Burton Property (i.e., the property between the well field and Snowden Street) to install monitoring wells as requested by IDEM in comment 3 in the August 17, 2023, RWP Addendum 2 comment letter. While there have been multiple conversations with the new owners, with a proposed access agreement provided, RTX has not yet been able to secure access. As discussed during the meeting, IDEM agreed to contact the property owner to assist in gaining access. To this end, Stantec provided IDEM with a contact number for the property owner representative on June 17, 2024.

Remediation Update

- The Enhanced In Situ Bioremediation (EISB) Pilot Study is complete and a report documenting the results will be submitted to IDEM in the next 30 days. It is noted that data related to the EISB pilot study has been provided to IDEM as collected in the quarterly groundwater status reports. The Pilot Study report will compile the EISB data into a single report with additional analysis and technical parameters/considerations for IDEM's review.
- Following submittal of the EISB Pilot Study Report, RTX intends to submit a Work Plan for On Site EISB Treatment. The intent of the proposed treatment is to reduce VOC concentrations in the areas of highest concentration observed on site, reduce the potential for future migration, and ultimately reduce the duration of containment system operations. The results of the EISB Pilot Study will serve as the basis for development of this work plan. The work plan will provide specifications and locations for implementing EISB substrate injection on site. In addition, the work plan considers the scope and necessity of additional operational safeguards needed to maintain efficiency of the groundwater containment system and compliance with RTX's NPDES permit while implementing EISB within the containment area. For example, implementing EISB will result in stronger reducing conditions in groundwater captured in the Jackson Street containment wells. As a result, the potential exists for additional mineral fouling to occur in the air stripper, bag filters, and carbon vessels. Therefore, additional monitoring and maintenance will be proposed to maintain effective operation of the system. It may be necessary to modify the NPDES permit to facilitate treatment. Therefore, the timing of proposed EISB treatment may be affected by the NPDES permit modification process.

Reference: Remediation Work Plan Addendum 2

Regional Water Supply Update

RTX has engaged the Lochmueller Group and Baker Tilly to update their 2023 grant application and related work for the City of Huntington and Town of Andrews in support of a regional water supply from Huntington to Andrews. The engineers/consultants have been refining the design and phasing of the regional water project, while working with RTX, the City, Town, Huntington County, Indiana Finance Authority (IFA), and United States Department of Agriculture, Indiana office (USDA). The IFA has given this project the highest priority ranking in the State and expects to know the amount of its available funding sometime in July. The USDA has indicated it will expeditiously process the grant application being prepared by the Lochmueller Group, once finalized, and determine available funding. It is expected that discussions among all interested parties and funding entities will take place throughout July and more detailed agreements will be negotiated in August, as needed. A favorable outcome would affect RTX's VRP Project and its responses to IDEM's comments on the RWP Addendum 2. The RWP Addendum 2 would require material modifications to reflect the introduction of a new water source that eliminates the Town's need to use local groundwater as its drinking water source.

RWP Addendum 2 Response Update

On August 17, 2023, IDEM provided their comments on the RWP Addendum 2 (dated September 12, 2022). These comments were discussed with IDEM in a meeting December 13, 2023 and February 8, 2024. As documented in Stantec's letter dated February 20, 2024, it was agreed to postpone any response to this letter until July 1, 2024. As discussed during the June 13, 2024, meeting and in consideration of the likelihood that the regional water supply issue (discussed above) could be resolved in the next approximately 60 days, it was agreed to postpone formal response to the August 17, 2023, comment letter and/or revision of the RWP Addendum 2 until after that matter is settled.

Thank you for meeting with us on June 13, 2024. Please confirm your concurrence with the adjustment of the due date for response to the August 17, 2023, IDEM comment letter as described above.

Thank you,

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Attachment: Report Submittal Table

TABLE - 1
Document Submittal History - Since 2022 RWP Addendum 2
Former United Technologies Automotive Facility
Andrews, Indiana
IDEM VRP # 6930702

Date	Title	VFC #
September 14, 2022	Andrews Monthly Sampling Results (June 2022)	83379603
September 14, 2022	Andrews Monthly Sampling Results (July 2022)	83379647
October 24, 2022	Andrews Monthly Sampling Results (August 2022)	83390463
October 24, 2022	Indoor Air Sampling Results Letter - Structure 7	83390459
October 28, 2022	Andrews Monthly Sampling Results (September 2022)	83390466
October 28, 2022	Indoor Air Sampling Results Letters - Structure 78	83390462
November 11, 2022	Quarterly Report No. 3 (July - September 2022)	83401693
December 8, 2022	Quarterly Status Update - Third Quarter 2022	83409764
December 20, 2022	Andrews Monthly Sampling Results (November 2022)	83410219
December 20, 2022	Andrews Monthly Sampling Results (October 2022)	83410214
February 1, 2023	Indoor Air Sampling Results Letter - Structure 7	83437382
February 28, 2023	Andrews Monthly Sampling Results (January 2023)	83453302
February 28, 2023	Andrews Monthly Sampling Results (December 2022)	83453301
March 13, 2023	Indoor Air Sampling Results Letters - Structures 7 and 61	83453332
March 15, 2023	Quarterly Status Update - Fourth Quarter 2022	83453333
April 11, 2023	Quarterly Report No. 4 (October - December 2022)	83469263
April 25, 2023	Andrews Monthly Sampling Results (February 2023)	83469264
May 18, 2023	Andrews Monthly Sampling Results (March 2023)	83483271
June 2, 2023	Andrews Monthly Sampling Results (April 2023)	83485253
June 5, 2023	Quarterly Report No. 1 (January - March 2023)	83495683
June 5, 2023	Quarterly Status Update - First Quarter 2023	83495702
August 2, 2023	Quarterly Report No. 2 (April - June 2023)	83521813
August 22, 2023	Indoor Air Sampling Results Letters - Structure 7	83528020

TABLE - 1
Document Submittal History - Since 2022 RWP Addendum 2
Former United Technologies Automotive Facility
Andrews, Indiana
IDEM VRP # 6930702

Date	Title	VFC #
August 22, 2023	Andrews Monthly Sampling Results (June 2023)	83528024
September 26, 2023	Quarterly Status Update - Second Quarter 2023	83540201
October 12, 2023	Andrews Monthly Sampling Results (July 2023)	83546375
October 12, 2023	Indoor Air Sampling Results Letters - Structure 7	83546378
November 15, 2023	Quarterly Report No. 3 (July - September 2023)	83563203
November 15, 2023	Andrews Monthly Sampling Results (September 2023)	83563201
November 20, 2023	Andrews Monthly Sampling Results (October 2023)	83563820
January 2, 2024	Andrews Monthly Sampling Results (November 2023)	83578718
January 11, 2024	Quarterly Status Update - Third Quarter 2023	83583352
February 15, 2024	Andrews Monthly Sampling Results (December 2023)	83599964
February 15, 2024	Quarterly Report No. 4 (October - December 2023)	83599967
February 15, 2024	Indoor Air Sampling Results Letters - Structure 7	83599961
April 4, 2024	Andrews Monthly Sampling Results (January 2024)	83627871
April 18, 2024	Quarterly Status Update - Fourth Quarter 2023	83632687
April 24, 2024	Andrews Monthly Sampling Results (March 2024)	83632832
April 25, 2024	Quarterly Report No. 1 (January - March 2024)	83630106
May 9, 2024	Indoor Air Sampling Results Letters - Structures 7, 13, 14, 20, 25, 34, 71	83637419
May 24, 2024	Andrews Monthly Sampling Results (April 2024)	83646836
June 13, 2024	Quarterly Status Update - First Quarter 2024	NA*

Note:

NA* = Document could not be located on Virtual File Cabinet (VFC) at the time of submittal