



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

July 3, 2024

Raymond P. Shaw  
626 Elliott Court  
Greentown, IN 46936

John Martin  
700 Buck Run Lane  
Greentown, IN 46936

Re: **Remediation Work Plan (RWP)/Closure Strategy**

Original Greentown Dry Cleaners  
113 North Meridian Street  
Greentown, Howard County  
State Cleanup Site #0001015

Dear Mr. Shaw and Mr. Martin:

The Indiana Department of Environmental Management (IDEM) has reviewed the document titled Remediation Work Plan (RWP)/Closure Strategy, *Original Greentown Dry Cleaners, 113 North Meridian Street, Greentown, Howard County, State Cleanup Site Number 0001015, August Mack Project Number JV1115.380* (RWP), prepared and submitted by August Mack Environmental, Suite 300, 1302 North Meridian Street, Indianapolis, Indiana, 46202. The RWP was submitted in response to a release(s) of hazardous substances at the Original Greentown Dry Cleaners Site located at 113 North Meridian Street, Greentown, Howard County, Indiana (Site). The RTC is available in IDEM's Virtual File Cabinet (VFC) as document #[83645064](#). 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) 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, closure cannot be given due to the plume being co-mingled. The following comments must be incorporated into a modified closure strategy:

## Comments

1. IDEM agrees that an environmental restrictive covenant (ERC) is an appropriate component of the closure approach for the site. However, previous investigations have not addressed the possible contribution of the site to the off-site vapor intrusion (VI) and ground water release related chemicals (RRC)s. The groundwater plume extends beyond the release related



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*We appreciate your input!*



properties, into the West Main Street right-of-way and onto the residential and commercial properties to the southwest.

2. The use of a Howard County Ordinance is not acceptable unless it is approved by the local governing agencies. Additional ERCs for off-site properties and a notice for the West Main Street right-of-way RRCs are needed before closure can be considered.
3. As the RRCs are part of a co-mingled plume, a more prudent closure strategy would be for all associated responsible parties (RPs) to work together to file ERCs on all impacted properties within the impacted area. It seems virtually impossible to determine which party is specifically responsible for what portion of a co-mingled plume is theirs. No wells have been drilled between the Original Greentown Dry Cleaning facility and Hulce's Grocery. If all impacted properties have appropriate ERCs filed, further delineation is not required.
4. Long-Term Stewardship is required until vapor intrusion (VI) samples can be collected at the American Legion property. Long-Term Stewardship is required to track property ownership and engage with any new property owner in the future.

## Conclusion

Closure cannot be issued solely for the Original Greentown Dry Cleaning site due to the plume being co-mingled. Site wide closure can be awarded with site wide appropriate ERCs and Long-Term Stewardship of the American Legion Property.

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the modified Closure Strategy Work Plan 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 [www.idem.in.gov/myesubmission](http://www.idem.in.gov/myesubmission).

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 Mr. Kenneth C. McDaniel.

Sincerely,

*Kenneth C. McDaniel*

(this document signed electronically)

Kenneth C. McDaniel  
State Cleanup Section  
Office of Land Quality

KCM:

cc: IDEM Site #0001015

Original Greentown Dry Cleaners  
3 July 2024  
Page 3 of 3

cc: Bryant Hoffer, LPG, CHMM, Senior Manager, Geologist, August Mack Environmental, Inc., Suite 300, 1302 North Meridian Street, Indianapolis, IN 46202

David L. Guevara, PhD, Taft, Suite 3500, One Indiana Square, Indianapolis, Indiana 46204-2023

Howard County Health Department, Suite 206, 120 Mulberry Street, Kokomo, Indiana 46901

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).