



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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July 5, 2024

Jeff Loewe  
NiSource  
801 East 86th Ave.  
Merrillville, IN 46410

\*Transmitted via Email\*

Re: Soil Management Plan  
Plymouth MGP  
500 West Monroe Street  
Plymouth, Indiana  
VRP # 6031206

Dear Mr. Loewe:

The Indiana Department of Environmental Management (IDEM) has reviewed the Soil Management Plan (SMP) (AECOME, May 20, 2024) for the Plymouth MGP site located at 500 West Monroe Street in Plymouth, Indiana.

The file was uploaded to the IDEM Virtual File Cabinet (VFC) as document #83641874. Further site history can be found in the VFC located on the IDEM website [vfc.idem.in.gov](http://vfc.idem.in.gov). This technical letter contains a brief background summary including comments generated during our review of the above-mentioned report.

## Background

A revised Remediation Work Plan (RWP) was received by IDEM March 27, 2017 that included updated data and responses to IDEM comments (VFC #80439308). Formal approval was given to the RWP on May 24, 2017. The site is located in Plymouth, Marshall County, approximately 2,000 feet west of the Yellow River. The site is currently owned by NIPSCO (Northern Indiana Public Service Company), a subsidiary of NiSource, and serves as a local operating area (LOA) maintenance facility and equipment storage area. The facility is currently used as service center and maintenance yard. An asphalt parking lot covers the footprint of all former manufactured gas plant (MGP) structures. Four buildings currently stand onsite. The main office building, which houses offices, an equipment repair shop, and parts and material storage areas, is located in the southeast corner of the property. A small storage shed stands along the southern property boundary. A vehicle garage is located in the northeast corner of the site. The fourth building, most centrally located on the site, is used primarily for vehicle storage, but also includes an employee meeting area. Active Norfolk-Southern railroad tracks border the site to the west; industrial/commercial properties, including Plymouth Foundry and Carnegie Towing Equipment, border the site to the north; residential properties border the site to the east; and commercial properties border the site to the south. Future use of the property is anticipated to remain non-residential.

The site was a manufactured gas plant and operated as such from 1887 to 1930 using both the coal carbonization and the carbureted water gas processes. The plant ceased manufacturing



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gas in 1930 and the remaining facility served as a transfer station until 1957. The contamination is present in affected media (soil, saturated media, and groundwater) as a result of historic releases of MGP residuals to subsurface media from former MGP process structures including tar wells, gas holders, purifiers, and associated piping, the use and placement of fill for site grading purposes. Contaminants of concern are Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX), Polycyclic Aromatic Hydrocarbons (PAHs), Metals, and Cyanide and their closure levels are Risk Integrated System of Closure (RISC) 2001 Default levels.

Remediation was accomplished by source soil removal to eliminate potential direct contact exposure pathways for future site workers. Additionally, recovery wells were installed for the removal of free product to the extent practicable. Institutional controls include environmental restrictive covenants (ERC) to prohibit withdrawal of groundwater and restricting land use to industrial/commercial. Engineering controls include an intact perimeter fence and gate system which restricts access to site workers and authorized persons and asphalt surfaces which prohibit direct contact with potentially affected surface soils. The fence and asphalt will be maintained indefinitely.

Comparison of groundwater data for all quarterly sampling events indicates that the extent of impacts to groundwater has not changed over the 11 years of sampling activities in the study area. Current conditions indicate that the downgradient extent of dissolved phase MGP impacts has been defined and is contained onsite.

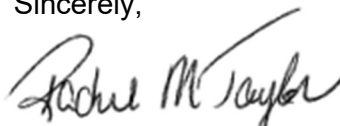
Comments generated during the review of the SMP are summarized below.

#### Comments

1. IDEM has reviewed this revised version of the SMP. IDEM's request for the additional details to be included and acknowledged within the SMP have been satisfactorily met. Upon approval of this document and VFC# has been established for this document, the VFC# should be included in the draft ERC.

If you have any questions, please contact me at (317) 234-3793, (800) 451-6027 or at [RMTaylor@idem.in.gov](mailto:RMTaylor@idem.in.gov).

Sincerely,



Rachel M. Taylor, LPG #2645  
Senior Environmental Manager  
Voluntary Remediation Program  
Office of Land Quality

EC: Jennifer Williams, NiSource, Inc., 150 W. Market Street, Suite 600, Indianapolis, IN 46204

*It is the goal of IDEM to enable remediation sites to move forward in a timely manner. If an impasse has been reached over technical issues, a Technical Review Panel of non OLQ scientists is available to review and offer a non-binding opinion to help resolve technical disagreements with the VRP and State Cleanup Program project managers. The goal is to facilitate progress at your site. This review process is available immediately. If you would like to request a review by*

*the Panel, please contact Kevin Davis, Remediation Services Branch Chief for the Office of Land Quality, at 317-232-4535 or [kdavis2@idem.in.gov](mailto:kdavis2@idem.in.gov).*

*Any decision produced by the Technical Review Panel is not an agency action as defined in IC § 4-21.5-1-4 or an order as defined in IC §4-21.5-1-9. This decision is not subject to administrative review because it is not a determination of any legal rights, duties, privileges, immunities, or other legal interests, and because it is issued pursuant to an informal procedure for dispute resolution as allowed by IC 4-21.5-3-34 (a).*