



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 26, 2024

Robert Kantor
Brookside Owner LLC
55 Fifth Avenue
New York, New York 10003

****Transmitted via Email****

Re: Supplemental Soil Investigation Report
Former Indy Power Grid, LLC
3950 Culligan Avenue #G
Indianapolis, Indiana 46218
VRP # 6220701

Dear Mr. Kantor:

The Indiana Department of Environmental Management (IDEM) has reviewed the Supplemental Soil Investigation Report (Lynn Douglas, Inc., April 24, 2024) for the Former Indy Power Grid, LLC site located at 3950 Culligan Avenue #G in Indianapolis, Indiana.

The report was uploaded to the IDEM Virtual File Cabinet (VFC) as document # 83638600. Further site history can be found in the VFC located on the IDEM website vfc.idem.in.gov. This technical letter contains a brief background summary including comments generated during our review of the above-mentioned report.

Background

The site is located in a multi-tenant commercial and industrial park. The site was first developed in 1904 as a glass manufacturing and painting company. Glass manufacturing operations ceased in the 1950s and the buildings were demolished in the 1990s. The debris from the demolition was used as fill along Brookside Creek on the northern boundary of the site. Most recently, the site was used as an industrial battery and charger supplier.

Various recognized environmental conditions were identified on the property: (1) the former glass company, (2) a filling station located in the southwest corner of the site, and (3) staining on the asphalt behind the building near the loading dock trailing down toward a storm drain that empties into Brookside Creek.

In April 2019, preliminary investigations onsite included 15 soil and 7 groundwater samples. All samples were tested for volatile organic compounds (VOCs), resource conservation and recovery act (RCRA) metals, polyaromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPHs), and polychlorinated biphenyls (PCBs). One soil sample resulted in a detection of lead at 27,800 milligram/kilogram (mg/kg) at five feet below ground surface (ft bgs). In May 2019, soil samples were taken near the previous sample and found lead to be 1,980 mg/kg at five ft bgs. During the May 2019 sampling event, various sediment samples up and down Brookside Creek and near the discharge point were taken and analyzed. Lead, arsenic, barium, cadmium, and chromium were detected in the sediment samples. Groundwater was also sampled during this time and had minimal detections of lead. The detections in the groundwater were attributed to turbidity, which is the likely cause of the detection.



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

We appreciate your input!



In March 2020, a limited site investigation took place, including the installation of three groundwater wells and additional sampling of soil and groundwater onsite. One soil sampling point (MW-1R) had a concentration of lead at 3,690 mg/kg at three ft bgs. Due to these findings, Indy Power Grid entered the Voluntary Remediation Program in July 2022. Lynn-Douglass, Inc. (LDI) submitted a Voluntary Remediation Implementation Report (VRIP) on January 20, 2023, which laid out plans for remediating the Indy Power Grid site.

The VRIP proposed additional sediment investigation in and near Brookside Creek, installation of four additional groundwater monitoring wells surrounding the release area west of the site building, and an active remedy including: removal of contaminated sediment and installation of an impervious barrier covering the drainage swale in order to prevent further contamination into the creek.

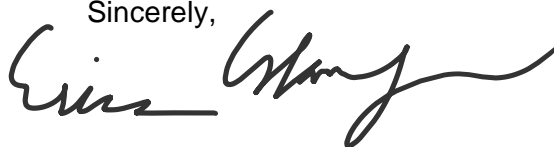
Due to the lead contamination found in MW-1R, IDEM requested additional investigation activities to fully delineate the lead contamination. IDEM approved a Further Site Investigation Plan (FSI) that was submitted by LDI on August 24, 2023. The plan included the installation of eight additional soil borings within the area of the former spill area to determine the vertical and horizontal extents of contamination. This work was completed in October 2023. Per email, IDEM requested a new map depicting the location of MW-1R in relation to the stained concrete. Based on the new map, IDEM requested additional shallow soil investigation near MW-1R to ensure the contamination had been full delineated. Below are comments regarding the most recent soil investigations.

Comments

1. Considering the initial lead result in MW-1R at 3,690 mg/kg and the LB-14 result in October 2023 at 914 mg/kg with a boring in between yielding no lead commercial soil published level (CSPL) exceedance, LDI concludes that there is no discernable source area but random distribution of lead at three feet bgs and arsenic as high at 597 mg/kg and 122 mg/kg at 14 feet bgs associated with backfill from previous site operations as a glass manufacturer. In addition, there are isolated residential soil published level (RSPL) exceedances for cadmium and copper. LDI proposes no action to address this but do propose the original VRIP remedy, including clearing sediment from the drainage swale to address previous releases from the former loading dock area and cap the swale with an impervious barrier. This is acceptable to IDEM.
2. IDEM recommends placing an ERC on the property after the remedy is completed to restrict the site to commercial use and create a soil management plan to manage any remaining contaminant on-site.
3. The soil investigations to-date have delineated the shallow soil contaminants on-site, and the original VRIP remedy can now be completed.

Please notify IDEM 10 days prior to conducting field work. If you have any questions, please contact me at (317) 234-4434, (800) 451-6027, or at esadams@idem.in.gov.

Sincerely,



Erica Adams,
Project Manager
Voluntary Remediation Program
Office of Land Quality

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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.

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).