



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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*Commissioner*

June 27, 2024

Mark Podgorski, VP Hospital Relations  
Goshen Hospital Association, Inc.  
200 High Park Avenue  
Goshen, IN 46256

\*Transmitted via Email\*

Re: Remediation Progress Report April 2024 Review  
Goshen Hospital  
200 High Park Avenue  
Goshen, IN 46256  
VRP # 6200501

Dear Mr. Podgorski:

The Indiana Department of Environmental Management (IDEM) has reviewed the Remediation Progress Report (Roberts Environmental Services, LLC [Roberts], May 10, 2024) for the Goshen Hospital site located at 200 High Park Avenue in Goshen, Indiana.

The report was uploaded to the IDEM Virtual File Cabinet (VFC) as document # 83642941. 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

The Goshen Hospital (site) is an active hospital facility and has operated as such since its development and construction in approximately 1955. The site is located on the south side of Goshen in a primarily residential area and is surrounded by residential properties to the north, south and west. To the east, the Goshen College campus is adjacent to the site. Construction of a new patient tower began in 2019 and remains in progress. In anticipation of the construction activities, two 10,000-gallon fuel oil underground storage tanks (USTs) were removed in December 2019. Based on investigation activities conducted to date, the nature and extent of contamination is defined and limited to on-site.

During construction activities in April 2020, stained soils and petroleum odors were observed in an area located to the east of the former USTs. At that time, active dewatering was occurring at the site in association with the patient tower construction project. Initial investigation activities, including sampling of soils and dewatering wells, identified petroleum impacts to soil and groundwater. Active remediation included removal of approximately 3,500 tons of petroleum impacted soil from the UST area in May 2020 during dewatering activities associated with construction activities for a new patient tower.



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*We appreciate your input!*



The approved Remediation Work Plan proposed continuation of quarterly groundwater monitoring until plume stability can be demonstrated, as well as an on-site environmental restrictive covenant restricting groundwater use at the site, if needed. Groundwater sampling conducted in July 2021 identified 1-methylnaphthalene at a concentration of 29 ug/L and dibenz(a,h)anthracene at a concentration of 1.3 ug/L, both in excess of their respective residential screening levels but below commercial screening levels. All other contaminants were either below screening levels or non-detect for contamination.

Due to groundwater concentrations exceeding residential screening levels in samples from well MW-2 and the applicant's desire for unconditional closure, Roberts performed additional remedial activities in June/July 2023, consisting of injecting a mixture of 10,000-pounds of PetroFix, 500 pounds of electron acceptors and water at 12 to 22 ft-bgs via 117 injection points in an approximately 6,000 square feet area surrounding well MW-2.

#### Comments

1. In April 2024, Roberts performed the third post remediation groundwater sampling event consisting of gauging groundwater levels and collecting groundwater samples for VOC, PAH, nitrate, and sulfate analysis from the nine monitoring wells using low flow sampling. The foundation drain sump was also sampled for PAH analysis. The sampling and analytical methods are acceptable.
2. Roberts stated that trend graphs show stable to decreasing concentrations since March 2021. Since remediation alters plume dynamics, it is not appropriate to use data collected prior to a post remediation (typically 12-months) equilibration period, for the purpose of evaluating post-remediation plume behavior/stability (R2 Sections 2.3.5.1 and 3.2.2.2). Given the applicant's desire for unconditional closure, the additional remediation activities will require an equilibration period and plume stability monitoring will be appropriate using data collected after July 2024. However, if contaminant concentrations do not rebound to above published levels during the equilibration period, unconditional closure may be requested after samples collected during the Third Quarter 2024 have been reviewed by IDEM.

The consultant must notify IDEM prior to conducting field work. If you have any questions, please contact me at (317) 233-1961, (800) 451-6027, or at [SSchrein@idem.in.gov](mailto:SSchrein@idem.in.gov).

Sincerely,



Sam Schreiner, LPG  
Project Manager  
Voluntary Remediation Program  
Office of Land Quality

ec: David Jeffers, Roberts Environmental Services, LLC, [djeffers@robertsenvironmental.net](mailto:djeffers@robertsenvironmental.net)

*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 OLO 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).*