



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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July 1, 2024

Jennifer Williams
Principal Environmental Remediation
NiSource Corporate Services
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Indianapolis, IN 46204
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Transmitted via Email

Re: Response to Comments, Third & Fourth Quarter 2023 Groundwater Monitoring Report
Kendallville MGP
850 South Main Street
Kendallville, IN
VRP #6040705

Dear Ms. Williams:

The Indiana Department of Environmental Management (IDEM) has reviewed the Third Quarter 2023 Groundwater Monitoring Report (GEI Consultants, Inc. [GEI], May 9, 2024), Fourth Quarter 2023 Groundwater Monitoring Report (GEI, May 9, 2024), and Response to IDEM's April 29, 2024 Second Quarter 2023 Groundwater Monitoring Report (GEI, June 18, 2024) for the Kendallville MGP site located at 850 South Main Street in Kendallville, Indiana.

The third quarter report was uploaded to the IDEM Virtual File Cabinet (VFC) as document #83636628, and the fourth quarter report was uploaded as document #83636645. The response to IDEM's comment letter was uploaded to VFC as document #83655507. 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 consists of a 24,000 square-foot manufacturing plant and a 1,500 square-foot storage building on an L-shaped 3-acre lot. It is in a primarily residential area bordered by a railroad to the west and a dental office to the east. Beginning in 1908, the site operated as a manufactured gas plant (MGP) owned by the Noble Fuel, Light & Power Company. Sanborn maps from 1908 to 1914 show the property consisted of a gas plant with a condenser room, tar well, and purifier room, and a small tar well and 50,000 cubic-foot capacity gas holder southeast of the gas plant. The plant ceased operation by 1922. Following closure of the MGP, the site operated as a tire and rubber manufacturer, a machinery shop, and an auto body shop. The site is currently used as an unstaffed storage facility owned by Reliable Production Machining & Welding.

The release-related chemicals (RRCs) are polycyclic aromatic hydrocarbons (PAHs), cyanide, metals, and petroleum-related volatile organic compounds (VOCs). The primary source of the RRCs is the former gas manufacturing operations that occurred on-site. Initial on-site investigations conducted in 1996 and in 2012 confirmed impacts to the groundwater, surface and subsurface soil. Soil impacts are localized in nature to the eastern portion of the site near



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We appreciate your input!



TP-14, SP-15, and SB-01, corresponding with the footprint of the former MGP. Visual impacts consisting of staining, tar blebs, bricks, and non-aqueous phase liquid (NAPL) have been observed in the surface and subsurface soil in the source area. Impacts outside of the former MGP plant location have been attributed to the historic industrial and urban nature of the area. Preliminary monitoring data indicated low levels of PAHs in the groundwater on-site. Off-site investigations have not been conducted.

The remedial action objectives (RAOs) for this site are based on the Risk-based Closure Guide (R2) Published Levels. The following was noted during our review of the abovementioned reports:

Groundwater Monitoring Reports

1. GEI plans on continuing quarterly groundwater monitoring in 2024. This is acceptable.

Response to IDEM’s Comments

2. **GEI’s response to IDEM’s comment #2:** *Prior to moving forward with any additional investigation NIPSCO and GEI will analyze the results from the first four quarters of groundwater monitoring events in conjunction with the 2012 investigation results to obtain a better understanding of the current conditions at the site and the need for further site investigation. Discussion of a further site investigation (FSI) will be included in the first quarter 2024 groundwater monitoring report.*

IDEM’s rejoinder: Analysis of the results from the proposed groundwater monitoring events can be used to evaluate current conditions and seasonal fluctuations; however, use of the 2012 investigation results with the 2024-2025 groundwater data may be insufficient in developing a conceptual site model (CSM) and a Remediation Work Plan (RWP). An FSI of the shallow impacts of the contaminants and NAPL in the area of TP-14, SP-15 and SB-01 is still necessary. The results of both the FSI and groundwater monitoring data will assist GEI in devising an adequate CSM that can be used to determine potential exposure risks and develop an appropriate remedy for the RWP.

General Comments

3. In past reports, GEI has listed the address for the site as 900 South Main Street. Future submittals should list the correct site address.

Following submittal of the first quarter 2024 groundwater monitoring report, please submit an FSI work plan to IDEM for review. If you have any questions, please contact me at (317) 234-9731, (800) 451-6027, or at email CFredin@idem.IN.gov.

Sincerely,



Claire Fredin,
Project Manager
Voluntary Remediation Program
Office of Land Quality

ec: Nathan McNurlen, CHMM, Senior Project Manager, GEI (nmcnurlen@geiconsultants.com)

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).