



Environmental Consultants

May 30, 2024

via e-mail

Indiana Department of Environmental Management
Office of Land Quality
State Cleanup Section, Attn: Syed A. Jaffery
100 North Senate Avenue
Indianapolis, IN 46204

E-mail: sjaffery@idem.IN.gov

RE: Further Site Investigation
Commercial Building Site
113-117 East Main Street
Delphi, Carroll County, Indiana
State Cleanup Site #0000382

Dear Mr. Jaffery:

The following contains a response to comments that were included in the Indiana Department of Environmental Management's ("IDEM") Further Site Investigation letter dated May 14, 2024 and addressed to William Bradshaw of Delphi Properties.

In response to comment #3:

Please confirm that the location of the proposed monitoring well (MW-7) is sufficient to assess the bedrock surface. Associated documents with the proposed location are presented in **Appendix A**. The utility corridor present in the proposed location of MW-7 may require the exact location of MW-7 to be modified before installation. However, BCA will exhaust all reasonable options in an attempt to install the well at this location.

In response to comment #8:

Indoor air (IA) sampling at the 113-115 E. Main Street property was conducted by BCA during the winter heating and summer cooling seasons of 2016. Release related compounds (RRCs) were far below their respective Residential Direct Exposure PLs in both samples IA-1 and IA-2 during both sampling events. BCA believes that this is enough evidence to support no further sampling of IA at the 113-115 E. Main Street building.

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In response to comment #10:

The following are lines of evidence that the sewer lateral in the alley between E. Main Street and E. Franklin Street is not acting as a preferential pathway for RRCs due to the release at 113-117 E. Main Street (Site). BCA believes these lines of evidence are compelling and support the claim that further sewer gas sampling is not necessary.

1. Not including Vinyl Chloride (VC), all RRC concentrations at SWG-1, the service hole nearest the release at the Site, were far below their respective Residential Conduit Vapor PLs and did not exceed their respective Residential Direct Exposure PLs during the two (2) rounds of sewer gas sampling. This observation suggests that the sewer gas at SWG-1 is incapable of causing an indoor air (IA) exceedance for these RRCs.
2. Vinyl Chloride has not been detected in any IA samples to date, suggesting that the sewer lateral is not acting as a preferential pathway for VC.
3. The PCE concentrations in the sewer gas at SWG-3 (Franklin St. & Alley) during both sampling events are nearly four times higher than those detected in the alley intersection near the Site at SWG-1. This suggests that a separate source is causing elevated concentrations of PCE at SWG-3, possibly the same source that is contributing to detections of chlorinated solvents at MW-4D.

Sincerely,

Rod A. Manny

Rod A. Manny, LPG
Project Geologist
BCA Environmental Consultants LLC

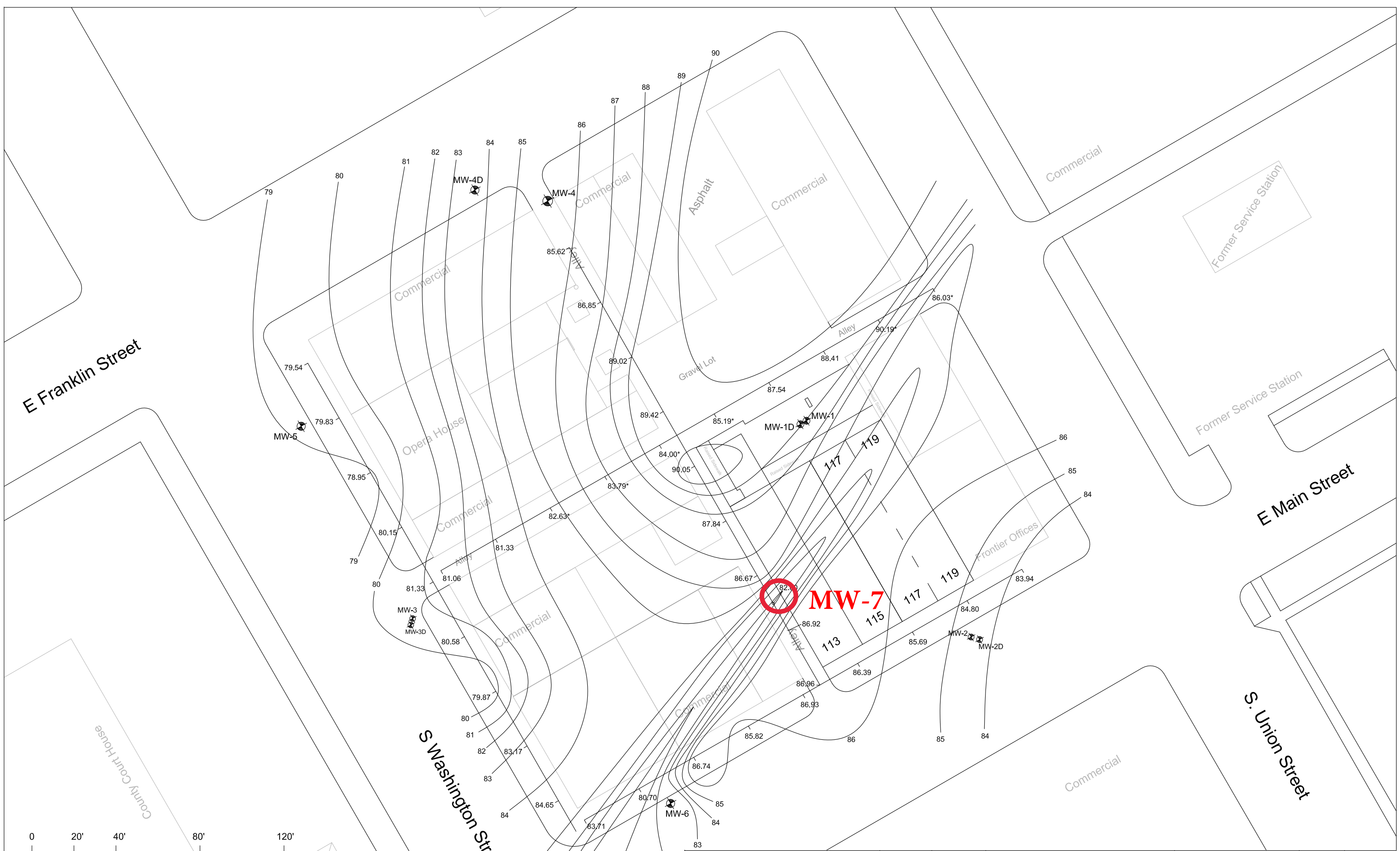
Enclosures

cc: William Bradshaw, Delphi Properties, LLC
David Gillay, Barnes & Thornburg, LLP

Appendix A

Proposed Location of MW-7

Commercial Properties
113-117 East Main Street
Delphi, Indiana 46923





E Franklin Street

E Main Street

S Washington Street

S Union Street



 BCA Environmental Consultants 7202 E. 87th St., Suite 110 Indianapolis, IN 46256 317-578-4233		DATE: 11/10/2022	DRAWING TITLE Site Map Bedrock Elevation Survey	PROJECT LOCATION: E. Main Street Buildings 113 - 117 E Main Street Delphi, Indiana	DRAWN BY: RM	FIGURE 14-202
		SCALE: 1" = 40'			BCA PROJECT NO. 14-202	

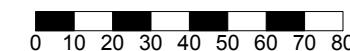


LEGEND



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Scale in Feet



1" = 50'

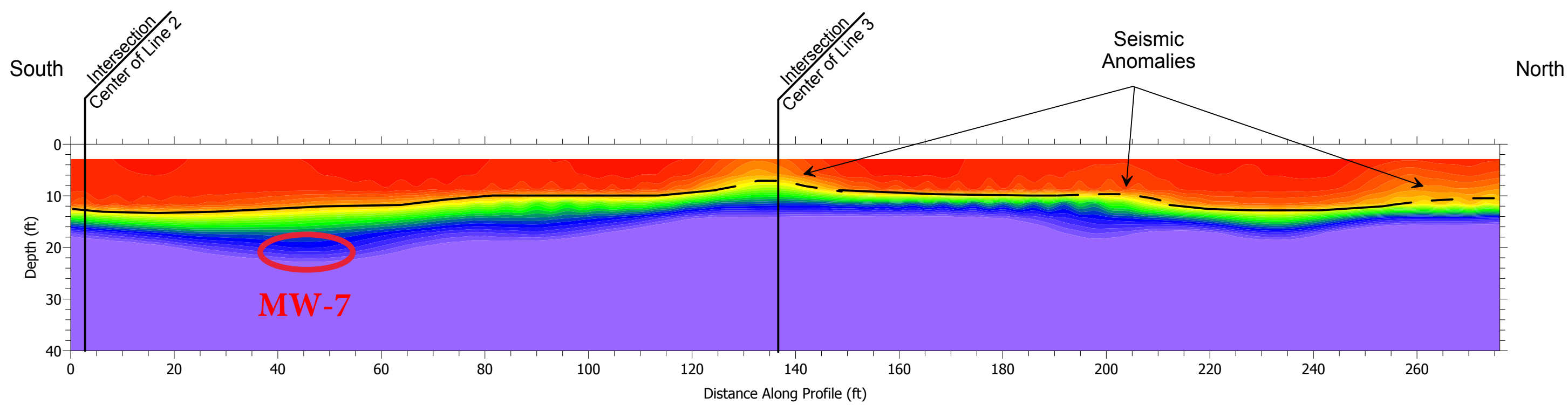


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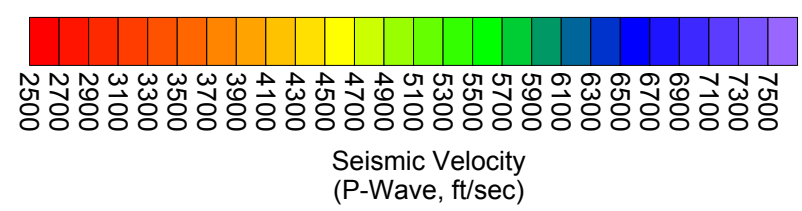
Figure 1

Site Layout And Data Coverage

113-117 E Main Street
 Delphi, Indiana
 Project No. 00-035-007



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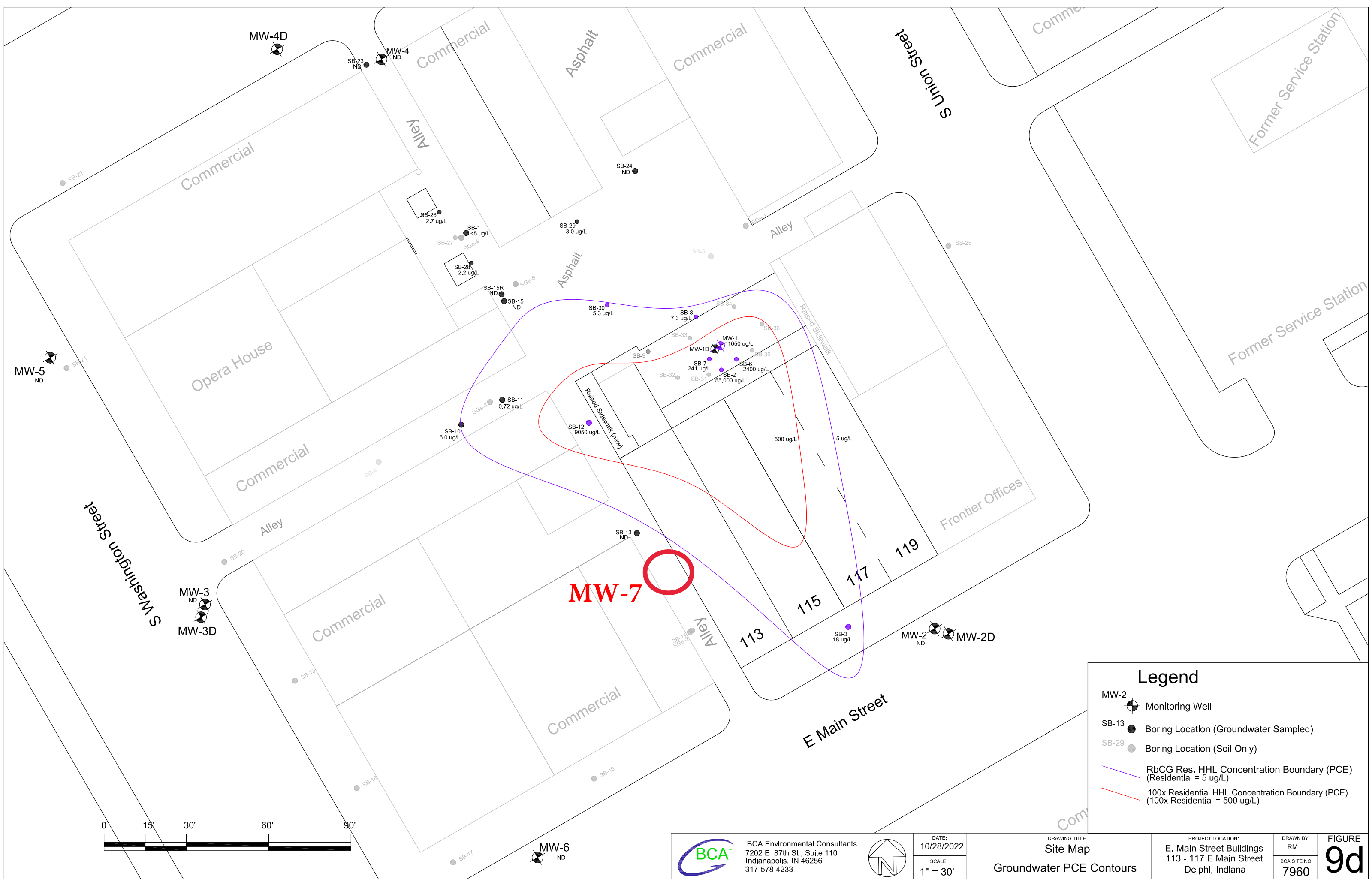


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Figure 5

Seismic Line 4

113-117 E Main Street
 Delphi, Indiana
 Project No. 00-035-007



MW-5
ND

MW-4D

MW-4
ND

Opera House

Commercial

MW-3
ND

MW-3D

Commercial

Commercial

MW-7

MW-6
ND

Alley

113

115

117

119

E Main Street

Frontier Offices

Former Service Station

Former Service Station

Union Street

Commercial

Commercial

Commercial

Commercial

S Washington Street

Alley

Asphalt

Asphalt

Alley

Raised Sidewalk

Raised Sidewalk (new)



Legend

- MW-2 Monitoring Well
- SB-13 Boring Location (Groundwater Sampled)
- SB-29 Boring Location (Soil Only)
- RbCG Res. HHL Concentration Boundary (PCE)
(Residential = 5 ug/L)
- 100x Residential HHL Concentration Boundary (PCE)
(100x Residential = 500 ug/L)



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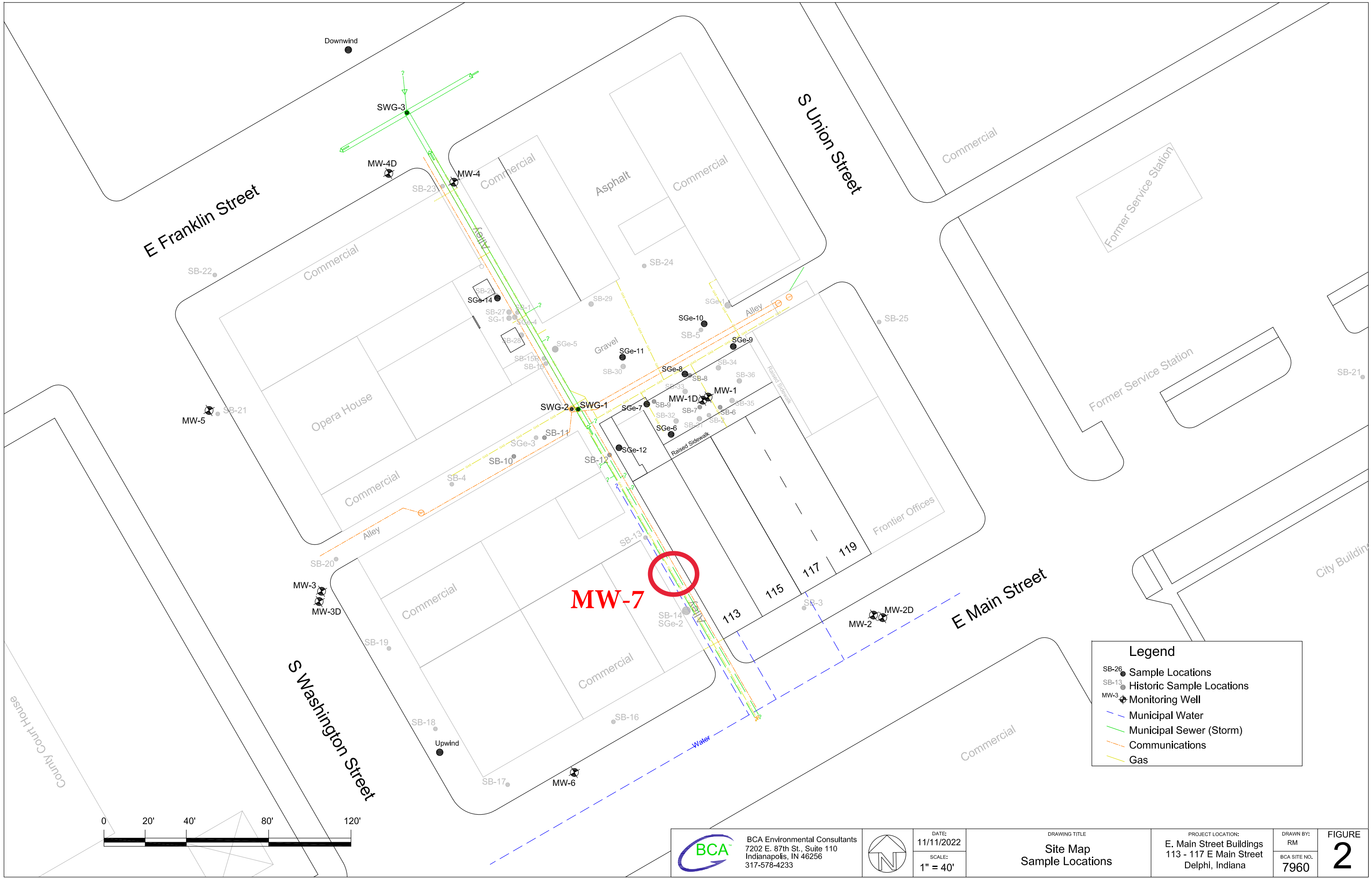
DATE:
10/28/2022
SCALE:
1" = 30'

DRAWING TITLE
Site Map
Groundwater PCE Contours

PROJECT LOCATION:
E. Main Street Buildings
113 - 117 E Main Street
Delphi, Indiana

DRAWN BY:
RM
BCA SITE NO.
7960

FIGURE
9d



Legend

- SB-26 Sample Locations
- SB-13 Historic Sample Locations
- ⊕ MW-3 Monitoring Well
- - - Municipal Water
- - - Municipal Sewer (Storm)
- - - Communications
- - - Gas

