



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 2, 2024

VIA EMAIL

Mr. Adam Bujoll, Vice President
Metalworking Lubricants Company
25 West Silverdome Industrial Park
Pontiac, Michigan 48342

Re: Response to IDEM Comments April 30, 2024
VFC # [83632423](#)
Metalworking Lubricants Company
EPA ID# IND000646950
Indianapolis, Marion County

Dear Mr. Bujoll:

IDEM's Office of Land Quality reviewed the *Response to IDEM's January 25, 2024, letter* submitted by August Mack Environmental (AME) on behalf of the facility on April 30, 2024.

1. IDEM agrees with Metalworking Lubricants Company's (MLC's) comments included in Responses 1, 3, 4, 6.
2. Response 2 states that due to the limited timeframe between installation and sample collection, the installation process may contribute to the elevated specific conductivity (SC) observed at groundwater monitoring well MW-14SR. Additionally, MLC concludes that an elevated SC alone does not indicate an unidentified contaminant plume exists.

IDEM agrees the 7-day timeframe between well installation and the sampling event might affect SC results and elevated SC results alone do not indicate contamination exists. However, elevated SC may also indicate effects of human activity, such as pollutants, have entered a groundwater aquifer. Additionally, three of the four elevated SC results, including the highest, occurred during the March 2023 sampling event before well installation or repairs occurred. In addition, since the elevated results appear restricted to wells corresponding to the area of the former separate lagoons where a contaminant plume exists, this suggests the source may be similar.

Although Section 5.1.3.5 of the *Resource Conservation and Recovery Act Facility Investigation* (RFI) dated October 19, 1995 (VFC # 82583878), and later revised pages (VFC #s [43520183](#), [65091612](#), [43970745](#)) indicate sampling personnel will measure conductivity during purging, IDEM is unable to locate SC data in *RCRA Facility Investigation* dated October 16, 1997 (VFC # [83010652](#)), which documents the investigation findings. Furthermore, IDEM is unable to locate SC results in



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reports documenting previous facility annual groundwater monitoring events contained in our virtual file cabinet (VFC) to perform a comparison.

Therefore, IDEM has determined that MLC must continue to perform additional investigation to determine if an unidentified contaminant plume exists and the nature and extent of any contaminant plume. Additionally, if MLC possesses SC results from groundwater monitoring events before 2023, that data needs to be submitted to IDEM for consideration.

3. Response 5 states that MLC was not able to collect groundwater quality samples at groundwater monitoring well MW-15 due to the presence of light non-aqueous phase liquid (LNAPL) and a small water column. While IDEM agrees with the rationale, IDEM's 2022 Risk-based Closure Guide (R2) also states, "additional investigation may be necessary to determine whether the LNAPL is potentially mobile." During the March 2023 groundwater monitoring event, MLC collected groundwater quality samples from groundwater monitoring wells (MW-7D, GW-16, GW-17) with free product thicknesses greater than 0.1 foot and similar water column thicknesses to that observed at MW-15. However, IDEM agrees with MLC's logic that the thickness of the LNAPL and small water column during the September 2023 sampling event made sample collection impractical.

IDEM requests MLC propose a minimum water column thickness for groundwater quality sample collection in the RFI plan. Additionally, if sampling personnel are unable to adequately monitor groundwater quality at MW-15, then the facility may need to install a replacement well or propose additional monitoring locations to determine and address the vertical and horizontal nature and extent of contamination emanating from the site as discussed in our letter dated April 9, 2024 (April 2024 Letter) (VFC # [83622680](#)).

4. **MLC must continue to attempt to gain access from the owners of the surrounding properties. Additionally, if MLC anticipates the adjacent properties will not grant access, then MLC needs to attempt to obtain permission to perform investigation activities in existing right-of ways (e.g., those established for roads) adjacent to the site and properties farther downgradient. Access to the additional area may allow MLC to investigate the horizontal and vertical extent of the contamination emanating from the site exceeding R2 Long-Term Residential Groundwater Published Levels (GWPL) (most recently updated March 1, 2024) to complete delineation.**
5. In Response 8, MLC concludes the lack of visual, olfactory, and "other indicators" suggests that contaminants have not migrated deeper than 25 feet from the surface. Contaminants at concentrations greater than the R2 GWPL may not present identifiable indications during field activities and require laboratory analysis to verify contaminant concentrations are below the applicable GWPL.

As originally stated in IDEM's July 8, 2022, letter (VFC # [83340442](#)), MLC needs to address the nature and extent of chemical constituents in groundwater due to past facility activities that have migrated off-site. The current well network will not facilitate vertical delineation of groundwater. Reasons for the need to determine the nature and extent are in IDEM's September 11, 2023 (VFC # [83532477](#)) letter, which includes recent submissions suggesting MLC needs to reevaluate the nature and extent of the release. **MLC needs to submit an RFI plan to adequately establish**

horizontal and vertical delineation of the contaminant plume emanating from the site as stated in the April 2024 Letter.

Please provide the action items specified in bold font above on or before July 14, 2024.

If you have any questions regarding this matter or would like to discuss it, please contact Debbie O'Brien at (317) 234-0162 or dobrien@idem.IN.gov.

Sincerely,



Donald W. Stiliz, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

cc: Marion County Health Department
Bill Souders, Plant Manager
Scott Waninger, Geology Section
Namrata Patel, Chemistry Services Section
Emma Barnes, Engineering Services Section
George Ritchotte, Industrial Waste Compliance Section
Nick Daily-Hill, Risk Service Section
David Zbieszkowski, August Mack Environmental
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