

## Kayden, Nora

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**From:** Kayden, Nora  
**Sent:** Wednesday, June 19, 2024 11:09 AM  
**To:** Matthew Lee Hennessy  
**Cc:** Slisz, Katherine M.; Carrie Doehrmann; Andrew A Gremos  
**Subject:** Response to comments March 19th 2024 - SCP Site #201334094

Hello Matthew,

The Indiana Department of Environmental Management (IDEM) has reviewed the Response to Comments dated March 19, 2024 located in the Virtual File Cabinet (VFC) as document #83615843. I am pleased that you were able to sort out the issue with the dry monitoring well (MW-3) and discovered the technical difficulty preventing groundwater recovery in the previous monitoring event. So, I have notified our technical staff about this issue and included comments relevant to the status of the project in this message.

1. Since there is no Remediation Work Plan (RWP) has been approved at this time, sampling data must be compared to the appropriate Risk Based Closure Guide (R2) Published Levels. Ramboll must prepare a RWP to provide documentation and a play of implantation regrading their selected remedial option.
2. Since the utility replacement project is not related to site response activities and the city contractor, VET Environmental, was involved with IDEM in the development of a soil disposal strategy for the utility replacement project, it is suggested that IDEM contact VET Environmental to obtain the requested disposal documentation and to discuss any recommended follow up actions. The most recent soil sampling data showed concentrations were well below soil R2 Direct Contact Published Levels . Based on the data collected, a soil management plan is not needed. IDEM has sent a follow-up to VET Environmental regarding the road work excavation as part of this project.

Our engineer working on the Site sent general feedback and guidance based on the specifications for the vapor intrusion (VI) system to be installed at the Site. They indicated they know Ramboll has plenty of experience in Indiana installing these systems. They indicated you may go ahead and install the system right away, since the VI investigation has been completed and results indicate mitigation is necessary. IDEM has the following comments in response to the VI system specifications emailed to IDEM on June 6, 2024:

- Design, installation, and testing of the system needs to follow IDEM Technical Guidance: Vapor Mitigation Systems, 2021, and follow R2 guidelines.
- An implementation report should be submitted after system testing and first round verification sampling has been completed (second round results may be submitted in subsequent report).
- An operation monitoring and maintenance (OMM) plan should be submitted according to IDEM policy for long term operation of the VI system.
- These reports/submittals may be submitted in routine quarterly reports.

Please submit the next quarterly report in the next 60 days. This documentation requested above (RWP, OMM Plan, implementation report) may be submitted in conjunction with or separately from the next quarterly report.

Thank you for working with us and please reach out if you have any questions.



Indiana Department of  
Environmental Management

**Nora Kayden**

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**From:** Matthew Lee Hennessy <mhennessy@ramboll.com>

**Sent:** Thursday, June 6, 2024 8:14 AM

**To:** Kayden, Nora <NKayden@idem.IN.gov>

**Cc:** Slisz, Katherine M. <kslisz@fbtlaw.com>; Carrie Doehrmann <cdoehrmann@fbtlaw.com>; Andrew A Gremos <agremos@ramboll.com>

**Subject:** RE: SCP Site #201334094 - Summer 2023 - Vapor Intrusion Report - Comment Letter

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Good morning, Nora,

To address the potential for vapor intrusion into the Site building, Ramboll plans to conduct the following scope of work:

- Perform a diagnostic pressure field extension test on the first floor of the northern half of the building; specifically in the Senoj Salon and Uncle Wangs Alley Restaurant. Based on these findings, the layout and construction of the Site building mitigation system may be refined (discussed below).
- Preliminary VMS Installation Design – it is anticipated that 4 RadonAway GX5a (or similar) mitigation fans will be installed to mitigate potential vapor intrusion into the commercial tenant spaces. It is estimated 2 will be installed in the Senoj Salon and 2 will be installed in Uncle Wangs Alley Restaurant. Each system will be constructed of 3" PVC and exhaust will be vented above the roofline. Dwyer minihelic pressure gauges will be installed on each system.
- Approximately 30 days following installation, an indoor air confirmation sampling event will be conducted in the Senoj Salon, Uncle Wangs Alley Restaurant, and within the first floor vacant tenant spaces. Samples will be collected in a similar manner as previous sampling events.
- The vapor mitigation system installation and 30-day post installation sampling event will be documented in a Remedial Implementation Report, or similar, and provided to IDEM.

The work will be conducted over multiple mobilizations to accommodate the Site building tenants schedules. The work is scheduled to begin June 17<sup>th</sup>. Please advise if you or the IDEM engineering staff have any questions or would like to discuss the proposed scope of work.

Thank you,  
Matt

**Matthew Hennessy, LPG**

Managing Consultant

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**From:** Doehrmann, Carrie <[cdoehrmann@fbtlaw.com](mailto:cdoehrmann@fbtlaw.com)>  
**Sent:** Monday, April 1, 2024 4:56 PM  
**To:** Kayden, Nora <[NKayden@idem.IN.gov](mailto:NKayden@idem.IN.gov)>  
**Cc:** Matthew Lee Hennessy <[mhennessy@ramboll.com](mailto:mhennessy@ramboll.com)>; Slisz, Katherine M. <[kslisz@fbtlaw.com](mailto:kslisz@fbtlaw.com)>  
**Subject:** RE: SCP Site #201334094 - Summer 2023 - Vapor Intrusion Report - Comment Letter

Hi Nora –

Thanks for the update and for providing the comment letter. Matt can send an email with a brief description of the planned system and we would appreciate any comments your engineers might have on the system.

Carrie

### **Carrie Doehrmann**

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**From:** Kayden, Nora <[NKayden@idem.IN.gov](mailto:NKayden@idem.IN.gov)>  
**Sent:** Wednesday, March 27, 2024 4:04 PM  
**To:** Doehrmann, Carrie <[cdoehrmann@fbtlaw.com](mailto:cdoehrmann@fbtlaw.com)>  
**Cc:** Matthew Lee Hennessy <[mhennessy@ramboll.com](mailto:mhennessy@ramboll.com)>  
**Subject:** SCP Site #201334094 - Summer 2023 - Vapor Intrusion Report - Comment Letter

Hello Carrie,

Please see the attached Comment Letter for the above-referenced Site.

I understand Ramboll plans to install a Vapor Mitigation System and requests to move on to implementation without submitting a plan. That's acceptable. However, without having our engineering staff review a plan, there is a chance further action or modifications may be necessary. If you would like to include a brief description of the chosen system in an email, I can have an engineer look over it and send any comments they may have.

If you have any questions, feel free to contact me.



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Environmental Management

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