



Mr. William Holland
Indiana Department of Environmental Management
Voluntary Remediation Program
100 N. Senate Avenue
Indianapolis, IN 46204

Subject:

Site Status Update and Extension Request
Franklin 1 Former Manufactured Gas Plant Site
249 W. Jefferson Street
Franklin, Indiana
IDEM VRP Site No.: 6031102

Date:
December 9, 2016

Contact:
Carrie Kozyrski
Phone:
317 838-1437

Dear Mr. Holland:

Email:
Carrie.Kozyrski@duke-
energy.com

Thank you for taking time to meet with the Duke Energy (Duke) team on October 26, 2016, to discuss the Duke MGP projects currently enrolled in the Indiana Department of Environmental Management Voluntary Remediation Program (IDEM VRP).

As we discussed during our meeting, the soil excavation remedy at the Franklin 1 Former Manufactured Gas Plant (MGP) Site is expected to be completed during 2017. As the August 6, 2015 IDEM Franklin 1 Former MGP Response to Comments letter requested that a groundwater evaluation amendment with four quarters of post-excavation groundwater data be submitted within 15 months after the removal action or by December 31, 2016 (whichever is earlier), we respectfully request an extension to that deadline. Duke proposes to submit the groundwater evaluation amendment within 15 months following completion of the soil excavation remedy.

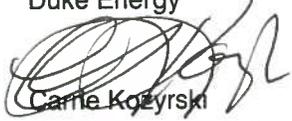
Please advise if this extension request is acceptable to IDEM.

Mr. William Holland
December 2, 2016

Please do not hesitate to contact me by phone (317-838-1437) or email at (Carrie.Kozyrski@duke-energy.com) if you have any questions regarding the Franklin 1 Former MGP Site.

Sincerely,

Duke Energy

A handwritten signature in black ink, appearing to read 'Carrie Kozyrski', written over a circular stamp or seal.

Carrie Kozyrski
Sr. Environmental Specialist

Enclosures:

August 6, 2015 IDEM Franklin 1 Former MGP Response to Comments



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 6, 2015

Todd Bachand
Remediation & Decommissioning
Duke Energy
139 East 4th Street
Cincinnati, Ohio 45202

Dear Mr. Bachand:

RE: Franklin I Former Manufactured
Gas Plant
Response to Comments
Remediation Work Plan
249 W. Jefferson Street
Franklin
IDEM Site # 6031102

The Indiana Department of Environmental Management (IDEM) has completed review of the Response to Comments: Franklin 1 Former Manufactured Gas Plant Remediation Work Plan, February 23, 2015. The response to comments document can be found in the Virtual File Cabinet (VFC) located on the IDEM website, www.idem.in.gov, identified as document #80011755.

The Remediation Work Plan proposed a combination of remedies including on-site soil excavation to remove the contents of the northern gas holder, tar well, and surrounding contaminated soils. The RWP also proposed to excavate surface soil impacts on the Bastin-Logan Commercial property. The RWP further proposed to use institutional controls to restrict residential and ground water use on both properties.

The soil excavation actions are approved at this time. Further monitoring of the ground water is needed for RWP approval. This letter does not constitute a remediation work plan approval under IC 13-25-5-8.5 and 10 at this time. In order for IDEM to approve the entire RWP, a ground water evaluation amendment with four quarters of post-excavation ground water data needs to be submitted 15 months after the removal action or by December 31, 2016 whichever is earlier.

IDEM's Responses to Previous Comments

1a & b. Responses Acceptable

- 1c. IDEM reviews all exposure pathways and possible future uses for the site. Therefore, the site needs to compare post-remediation ground water results for benzene and naphthalene to the Remediation Closure Guide vapor intrusion screening levels.
- 1d. Ammonia is a release-related contaminant of concern for the site and can toxic to aquatic life. Roaring Run Creek discharges to Young's Creek 330 feet southwest of the site. At the confluence of Roaring Run and Young's Creeks is Blue Heron wetland. The site closure strategy needs to demonstrate that exposure pathways to sensitive ecological receptors in surface water and wetlands in the vicinity of the site are incomplete.
2. Response Acceptable
3. Response Acceptable
4. IDEM still has some uncertainty about the shallow ground water at the site that an additional well between the excavated areas and the creek could resolve. IDEM expects to be on-site to observe the excavation activities and agrees to defer decisions about the location and necessity of the well until the excavation is complete and the confirmation sample results have been reviewed.
5. Response Acceptable
6. Response Acceptable
7. Response Acceptable
8. Response Acceptable
9. Response Acceptable

If you have any questions or comments regarding this project, please contact me at (317) 234-0967 or at bholland@idem.in.gov.

Sincerely,



William Holland, Project Manager
Voluntary Remediation Program
Office of Land Quality

cc: Mike Devir, Mike.Devir@arcadis-us.com
Tom Baker, Tom.Baker@h2lawyers.com