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**Subject:** Arvin Industries (Site #0000783) (RTE #4482-19G)  
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Arvin Industries  
Franklin, Johnson County  
State Cleanup #0000783 (CZ0LR)  
Supplemental ISC Report, June 27, 2019; VFC #[82801877](#) (RTE #3126-19G)

Tim Johnson,

I reviewed the document provided by Arcadis U.S., Inc. (Arcadis) and have the following comments:

Arcadis provides background information about the site's physical aspects and an overview of historical releases. To fully evaluate the potential for contamination and create a comprehensive CSM, additional information about the site operational history is needed. Special detail is needed wherever cVOCs may have been used in processes. This information needs to be provided so IDEM can evaluate whether supplemental samples are needed, in addition to the sample locations shown in Figure 10.

Several historical releases potentially discharged to the east drainage ditch. Arcadis proposes to collect a surface water sample from the ditch. Geological Services agrees that surface water sampling is needed for site characterization; however, Geological Services also recommends collecting a sediment sample along with the surface water sample.

Site figures show where the underground utilities exit the facility, but do not provide detail for the on-site utilities. The preferential pathway study needs to be expanded to include data evaluating the sewer line as a potential secondary source. Samples need to be collected along the sewer lines to evaluate the potential for a secondary contaminant source. The sewer investigation should include information about how the roof drains are connected to the underground utilities.

The CSM provided in Section 6 is based on regional information and contains very limited site specific data; therefore the included CSM may not represent current site conditions. The consultant proposes an ISC investigation (Figure 10) to provide the needed information. The proposed piezometer locations are acceptable. Geological Services recommends installation of an additional piezometer near SB-12 (The EM survey identified anomalies in the area).

Let me know if you have any additional questions or concerns.

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Peer Reviewed by: Sarah Finley Johanson; 8-22-19

This document reflects the opinions of technical staff based on information presented in the report under review addressing the condition of the site, including other relevant information available at the time of the investigation. It is intended for use in agency decision making and does not contain final determinations regarding potential remedial actions. Information in subsequent tech memos may diverge from information contained in this document based on changing site conditions or the discovery of additional relevant information.