



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 25, 2019

Mr. David O'Connor
Corporate Environmental Manager
Meritor, Inc.
2135 West Maple Street
Troy, Michigan 48084

Dear Mr. O'Connor:

**Re: Supplemental Initial Site Investigation
Report/Work Plan**
Former Arvin Industries
1001 Hurricane Street
Franklin, Johnson County
State Cleanup Site #0000783

The Indiana Department of Environmental Management (IDEM) has reviewed the *Supplemental Initial Site Investigation Report/ Work Plan* (Supplemental SI), prepared and submitted by Arcadis U.S. Inc. (Arcadis). The Supplemental SI was submitted in response to a release of hazardous substances at the Former Arvin Industries located at 1001 Hurricane Street, Franklin, Johnson County, Indiana (Site). The Supplemental SI is available in IDEM's Virtual File Cabinet (VFC) as document #82801877. The VFC is located on IDEM's website at <https://vfc.idem.in.gov/DocumentSearch.aspx>.

The Supplemental SI was evaluated based on IDEM's *Remediation Closure Guide* (RCG) and *Remediation Program Guide* (RPG) guidance manuals and *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW846) Third Edition, Update III. Based on the data submitted, the proposed Additional Site Investigation can be implemented. The following IDEM comments must be addressed where applicable:

Comments

1. Twelve soil borings were advanced during the Supplemental SI. Naphthalene was detected above the RCG Migration to Groundwater Screening Level (MGWSL) in soil boring SB-2 (4-5') and vinyl chloride was detected above the MGWSL in soil boring SB-7 (2-4'). Additional volatile organic compounds were detected in several soil borings below screening levels.
2. Groundwater sampling was conducted via low-flow sampling. Naphthalene, 1,1-dichloroethane, 1,1,1-trichloroethane, vinyl chloride, and tetrachloroethene (PCE) were detected above the applicable RCG Groundwater Screening Level in one or more soil borings. 1,1-dichloroethane and vinyl chloride were detected above the RCG Residential

Vapor Intrusion Groundwater Screening Level (RVIGWSL). Future low-flow groundwater sampling must include low flow groundwater field sheets to support the sample data. When soil and groundwater contamination has been defined, full quality control/quality assurance (QA/QC) must be provided to validate the chemistry results.

3. To fully evaluate the potential for contamination and create a comprehensive Conceptual Site Model (CSM) additional historic Site operational history is needed. Detail is needed wherever chlorinated volatile organic compounds (cVOCs) may have been used including location. This information is required for IDEM to determine whether supplemental samples are needed in addition to the samples depicted in Figure 10 of the report.
4. A sediment sample must be collected along with the proposed surface water sample from the east drainage ditch located on-Site.
5. Site figures depict where the underground utilities exit the facility but do not provide detail. The preferential pathway study must be expanded to include data evaluating the sewer line as a potential secondary source. Samples must be collected along the sewer lines. The sewer investigation must include information about how the roof drains are connected to the underground utilities.
6. The CSM provided in Section 6 is based on regional information but provides limited Site specific information. The proposed piezometer locations are acceptable. One additional piezometer near SB-12 where the electro-magnetic survey identified anomalies must be installed.
7. The introductory section of the Supplemental SI references the presence of trichloroethene (TCE) and PCE in the nearby Webb Wellfield. The Webb Wellfield was impacted primarily by cis and trans- 1,2-dichloroethene with minimal TCE/PCE impacts. This must be clarified for accuracy.

Conclusions

The work plan is acceptable for the Additional Site Investigation of Former Arvin Industries with the inclusion of the applicable comments listed above.

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the Additional Site Investigation to IDEM within 90 days of the date of this letter in accordance with IDEM Office of Land Quality document submittal guidelines, which are available online at www.in.gov/idem/landquality/2368.htm, to the following address:

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Indiana Department of Environmental Management
Office of Land Quality
State Cleanup Section, Attn: Tim Johnson
100 N. Senate Ave., IGCN, Room 1101
Indianapolis, IN 46204-2251

See Attachment A for procedures to resolve technical disagreements utilizing IDEM's Technical Review Panel.

If you have any questions or comments concerning this matter, please contact me at (317) 234-3931, or you may call IDEM's toll free number at (800) 451-6027 and ask for Tim Johnson.

Sincerely,



Tim Johnson
State Cleanup Section
Office of Land Quality

TRJ:sb
ec: IDEM Site #0000783
Mr. Jon Akin, Arcadis U.S., Inc.
Stephen Thill, IDEM OLC
Johnson County Health Department

Attachment A: Technical Review Panel Announcement

ATTACHMENT A
Technical Review Panel Announcement

Technical Review Panel

IDEM's Office of Land Quality Announces New Technical Review Panel for VRP and State Cleanup Program Technical Disputes

During the course of some remediation projects, technical disagreements between the Indiana Department of Environmental Management (IDEM) staff and external entities arise. We recognize that these disputes can often cause delays and frustration on both sides of the issue. Therefore, the IDEM has developed a mechanism for settling technical disagreements called the Technical Review Panel (Panel). The IDEM assembled a pool of approximately 12 IDEM scientists from outside the Office of Land Quality (OLQ) each having expertise applicable to the technical issues we commonly encounter. When the Panel is needed we will assemble a small group of those scientists with the appropriate expertise to help settle the dispute.

We envision the basic process to be as follows: If the IDEM project manager and the external party cannot agree on a technical issue within a reasonable time, the IDEM project manager will elevate the dispute to their Remediation Branch managers and senior Science Service technical staff for review. If the dispute is still not settled, the external party may contact the Remediation Services Branch Chief directly and request the issue be reviewed by the Panel. Each side will provide the Panel a short written summary of their technical view point prior to participating in an informal discussion with the Panel. The Panel will then provide written recommendations.

The Technical Review Panel is a pilot and at this time will only be used for disputes between our State Cleanup Program and/or the Voluntary Remediation Program (VRP) project managers and external parties.

Note: Any decision produced by the Technical Review Panel is not an agency action as defined in IC § 4-21.5-1-4 or an order as defined in IC §4-21.5-1-9. This decision is not subject to administrative review because it is not a determination of any legal rights, duties, privileges, immunities, or other legal interests, and because it is issued pursuant to an informal procedure for dispute resolution as allowed by IC 4-21.5-3-34 (a).

Our goal is to enable remediation sites to move forward in a timely manner and to provide external entities a forum outside the OLQ to help resolve technical disagreements with the VRP and State Cleanup Program project managers.

This review process is available immediately. If you would like to request a review by the Panel, please contact the Remediation Services Branch at (317) 232-4535 or scp@idem.in.gov.

Source: <http://www.in.gov/idem/landquality/2504.htm>