



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 25, 2019

Ms. Allison Wells Gritton
Wooden, McGlaughlin, LLP
211 North Pennsylvania Street
One Indiana Square, Suite 1800
Indianapolis, IN 46204

Dear Ms. Wells Gritton:

Re: Source Area Remedial Plan Approval
Reed Properties
1056 Eastview Drive
Franklin, Johnson County
State Cleanup Site #201342015

The Indiana Department of Environmental Management (IDEM) has reviewed the *Source Area Remedial Plan* (RP), prepared and submitted by Ramboll U.S. Corporation (Ramboll). The RP was submitted in response to a release of hazardous substances at the Reed Properties Site located at 1056 Eastview Drive, Franklin, Johnson County, Indiana (Site). The Source Area Remedial Plan is available in IDEM's Virtual File Cabinet (VFC) as document #82836039. The VFC is located on IDEM's website at <https://vfc.idem.in.gov/DocumentSearch.aspx>.

The document 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 remedial measures provided in the RP are approved. The following IDEM comments apply to the remediation:

Comments

1. Ramboll proposes remedial measures that include excavation of contaminated soils between 2 and 15 feet below ground surface. Ramboll estimates that approximately 2,100 tons of soil will be removed. Completion of the excavation will be confirmed with the collection of confirmatory soil samples. If the samples show contamination is still present, additional excavation will occur. IDEM approves.
2. Ramboll is developing a separate work plan to address groundwater contamination and Site closure. IDEM recommends applying groundwater treatment product in the excavation prior to backfilling.
3. Ramboll is proposing that full quality assurance/quality control (QA/QC) documentation will be submitted for data validation of confirmatory soil samples. Only the IDEM minimum data

documentation requirements are needed for this event because this sampling is not for delineation or closure.

4. Ramboll must dispose of all excavated soils in compliance with all Resource Conservation and Recovery Act (RCRA) regulations.

Conclusions

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the Remediation Completion Report to IDEM within 120 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:

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 #201342015
Mr. Charles Goodwin, Ramboll U.S. Corporation
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>