



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
*Governor*

**Bruno L. Pigott**  
*Commissioner*

October 19, 2020

Daniel Dyer  
Manager of Environmental Remediation  
CSX Transportation, Inc.  
31 East Georgia Street  
Indianapolis, IN 46204

Dear Mr. Dyer:

Re: Addendum to Revised Remediation Work Plan/  
Response to Revised RWP Comment Letter  
(September 16, 2020)  
Former Indiana Creosoting Company  
240 Country Club Road  
Bloomington, IN 47403  
VRP # 6970403

The Indiana Department of Environmental Management (IDEM) has reviewed the Addendum to Revised Remediation Work Plan/ Response to Revised RWP Comment Letter of September 16, 2020 (Arcadis, dated October 16, 2020) for the Former Indiana Creosoting Company site located at 240 Country Club Road in Bloomington, Indiana.

The response letter was uploaded to the IDEM Virtual File Cabinet (VFC) as document # 83059423. Further site history can be found in the VFC located on the IDEM website [www.idem.in.gov](http://www.idem.in.gov). This technical letter contains a brief background summary including comments generated during our review of the above mentioned response.

### Background

The Site is bordered to the north and east by commercial/industrial properties; and to the southeast, south and west by predominantly residential properties, although there is some commercial/industrial property along these boundaries as well. The Site is a generally rectangular shaped parcel of land approximately 40 acres in size and is divided into two portions by Country Club Road. The first portion, approximately 14 acres in size, is located north of Country Club Road and is divided by Clear Creek, which flows from north to south through the portion. This entire portion of the site generally lies in or near the floodplain of Clear Creek.

The area west of Clear Creek (north of Country Club Road) is where the former creosoting operations were performed. Creosote storage tanks and various railroad spurs were also located here. The area to the east of Clear Creek is a marshy area of floodplain that was included among land that CSX purchased in 2006 and was not part of the former wood-treating operation. The second portion of the Site, which is also divided by Clear Creek, is located south of Country Club Road, and comprises approximately 26 acres. The area to the west of Clear Creek was historically used to store untreated railroad ties and was never developed. The area to the east of Clear Creek consists of floodplain land that was included in CSXT's 2006 purchase described in the preceding paragraph, as well as approximately 6 acres of commercial land located predominantly above the floodplain that CSXT purchased in 2010. This area (east of Clear Creek) has historically been undeveloped.

Wood-treating operations began circa 1914 by the American Creosoting Company and ceased in 1976. The Indiana Creosoting Company, a subsidiary of the Monon Railroad, purchased the property from the American Creosoting Company in 1961. The Monon Railroad merged with the Louisville and Nashville Railroad in 1971, which was the predecessor company to CSXT. All creosote storage, handling, and use appears to have occurred north of Country Club Road in the former operations area.

The Site was formally entered into the Indiana Department of Environmental Management (IDEM) Voluntary Remediation Program (VRP) May 13, 1997. The current remediation and clean-up objectives for soil and groundwater at the Site are 1996 VRP Tier II Default Non-residential (Industrial) Scenario for on-site impacts and residential for off-site impacts, unless an Environmental Restrictive Covenant (ERC) is agreed upon by the off-site property owners. CSXT expects the land-use of this property to remain industrial at this time. The Site's constituents of concern (COCs) are BTEX (benzene, toluene, ethylbenzene, and xylenes), poly aromatic hydrocarbons (PAHs), phenolic compounds, phthalates, arsenic, and lead. Components of a Remediation Work Plan (RWP) were submitted between 2011 and 2015.

#### Comments

1. A conference call was held with the Indiana Department of Environmental Management (IDEM) on September 30, 2020 to resolve the final item (IDEM Comment #2) from IDEM's September 16, 2020 response letter. In response to the meeting, Arcadis submitted the following rejoinder:

“As agreed upon by the parties on the call, CSX will collect five more quarters of groundwater samples, one of which will be the storm water sampling event. Based on the free-product recovery program stopping in May 2020, the first two sample events before May 2020 and the third quarterly sample event conducted after May 2020 will be used in conjunction with these five new sampling events to evaluate long-term plume stability. If these eight quarters of data continue to show a stable or decreasing groundwater concentration trend, then the quarterly sampling events will end, and a Remediation Completion Report will be submitted to the IDEM.”

This rejoinder is acceptable to IDEM.

Now that this comment has been addressed to IDEM's satisfaction, the RRWP can be technically approved and put out for public notice. It is not necessary to reprint the sections of the RRWP that these comments address; the addendum letter response is acceptable.

If you have any questions, please contact me at (317) 233-5298, (800) 451-6027, or at email [mmccann@idem.in.gov](mailto:mmccann@idem.in.gov).

Sincerely,



Michael R. McCann, Project Manager  
Voluntary Remediation Program  
Office of Land Quality

*It is the goal of IDEM to enable remediation sites to move forward in a timely manner. If an impasse has been reached over technical issues, a Technical Review Panel of non OLQ scientists is available to review and offer a non-binding opinion to help resolve technical disagreements with the VRP and State Cleanup Program project managers. The goal is to facilitate progress at your site. This review process is available immediately. If you would like to request a review by the Panel, please contact Bruce Oertel, Branch Chief, Remediation Services Branch, OLQ at (317) 232-4535 or [boertel@idem.in.gov](mailto:boertel@idem.in.gov).*

*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).*