

February 6, 2023

sent by email

The Honorable Mayor Miles Hewitt
Peru City Hall
35 S. Broadway
Peru, IN 46970

Subject: Former Square D environmental issue

Mayor Hewitt,

During the last City Council meeting on January 9, 2023, there was a discussion about the Former Square D environmental issue. Please find additional information below on this topic.

- Commitment to address the environmental issue: Schneider Electric continues to work closely with the Indiana Department of Environmental Management (IDEM) to address historical environmental contamination on both the former Square D property and downgradient residential areas to the southeast. This contamination is due primarily to the presence of the chemical trichloroethene (TCE) resulting from historical practices pre-dating Schneider Electric's acquisition of Square D in 1991. Although Schneider Electric did not cause this contamination, we are taking full responsibility for it and are committed to securing regulatory closure from IDEM's Voluntary Remediation Program (VRP). We have rapidly investigated and taken initial actions to address these issues in compliance with, among other things, a Voluntary Remediation Agreement we executed with IDEM. While the management of this kind of environmental contamination typically takes years to fully address, we are committed to moving quickly through the process to address the potential risks, fulfill our obligations, and ensure there are no unacceptable future risks to human health or the environment.
- Commitment to transparency: We have worked diligently to communicate relevant information to affected stakeholders as it becomes available. We proactively informed IDEM early in our investigation process of the historical environmental contamination in connection with this site. As noted above, we enrolled this site in IDEM's VRP and continue to brief IDEM periodically and accept their input. Similarly, we proactively briefed City officials periodically over the last year. Recently, we have shared information with potentially affected residents. As we have gathered more data, our technical understanding of these complex issues has evolved. Although we do not yet have data to answer all possible questions, we remain committed to engaging with key stakeholders to share relevant information. Our report submissions to date are publicly available with IDEM as will be our future submissions.

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- Focus on potential exposure pathways: Working with IDEM, our initial focus has been to determine whether people are being exposed to the contamination using IDEM's published levels. The following are excerpts from IDEM's Fact Sheet (please refer to the original document for full context) based on the data gathered to date:
 - ***"Published levels are conservatively developed by the EPA to protect the most vulnerable populations, including children, the elderly, and immunocompromised individuals. Exceedance of an IDEM published level does not necessarily mean a health risk has been incurred since the formula uses very conservative exposure scenarios."***
 - ***"The schools located to the west of the facility are unaffected."***
 - ***"A person can be exposed to TCE by: 1) Touching soil containing TCE, 2) Drinking water containing TCE, and 3) Breathing air containing TCE."***
 - 1) ***"Soil contamination only occurs on the Square D property. Soil in the surrounding residential communities is safe for all activities, including gardening."***
 - 2) ***"Water is supplied to the surrounding residential communities by the City of Peru, therefore no drinking water is impacted. For residences in the identified area with a potable well on their property, please contact ERM or IDEM for well water sampling."***

As noted above, the third primary potential path of exposure is by breathing air containing TCE. With respect to former workers at the site, indoor air testing was conducted in September 2019 inside Plant 1 and no issues were identified. With respect to the residential community, we initially contacted the residence closest to our property in June 2022 and subsequently sampled the indoor air in October 2022, once access was granted. By January 2023, we had contacted the owners and/or tenants of 12 residences that fall within an area of soil vapor concentrations that exceed IDEM's published level for TCE. To date, three of these homes have been sampled for possible vapor intrusion and none have had detections above IDEM's published levels on the first floor living space. However, one home had detections above these levels in the basement, crawlspace, and below the basement slab. We immediately engaged in discussions of options with the owners and/or tenants. These discussions are ongoing.

- Resolution of alleged historical dumping of chemicals onsite: There have been reports of alleged dumping of chemicals at the former Square D property, north of the main building and beneath what is now a grassy area and parking lot. This area was previously a pond and is referred to in ERM's April 22, 2022 Site Investigation report as the Historical Fill Area. ERM's report documents investigations performed on behalf of the United States Environmental Protection Agency (USEPA) beginning in the 1980s and states, ***"On 8 May 1996, EPA Region 5 removed the facility from the CERCLIS database and placed it on the "Archive" list of properties, warranting no further evaluation."*** ERM conducted additional thorough investigations in this area beginning in 2019 and found no evidence of chemical dumping. IDEM, in a December 8, 2022 correspondence, stated, ***"The historical fill area located in the grassy field to the north of the main building has been delineated and contains no constituents of concern (COCs) above applicable screen levels."***
- Planning future activities: We anticipate submitting our Site Investigation Report (SIR) Addendum #2 by the first week of April that will describe the results of recent field investigations since our August 2022 SIR Addendum #1. IDEM has been informed of our currently anticipated upcoming activities and tentative scheduling, which include the following:

- Sanitary sewer water and vapor sampling in February
- Further on and offsite groundwater investigations on Denver Street as well as east of N Water St in March 2023 (subject to contractor availability, access, and weather)
- Sampling at the notified residences as access is provided by owners
- Additional investigations, remediation, and other actions will be determined based on the results of the activities described above

Unrelated to the environmental contamination issue, Schneider Electric received a Notice of Violation (NOV) in July 2022 from IDEM. The NOV does not assert any onsite or offsite improper disposal of TCE or other hazardous waste. Rather, IDEM concluded that Schneider Electric was not in compliance with reporting, planning, and training requirements related to its management of hazardous waste during the 2020 closure of facility operations. We have agreed with IDEM to resolve these issues, and Schneider Electric is committed to complying with all relevant State and Federal requirements. IDEM will make this information publicly available once finalized.

Sincerely,



Duane Wanty
Director Environmental Affairs

cc: Peru City Council
Betsy Edwards-Wolfe
Tom Gustin
Peter Sahaidachny
Patricia Russell
Mark Ramsey
Steve Anderson
Kathleen Plothow

State Legislators
Representative Ethan Manning
Senator Stacey Donato

Chelsea Day - IDEM
Lisa Ford - Miami County Health Department
Dustin Kern – Peru City Attorney