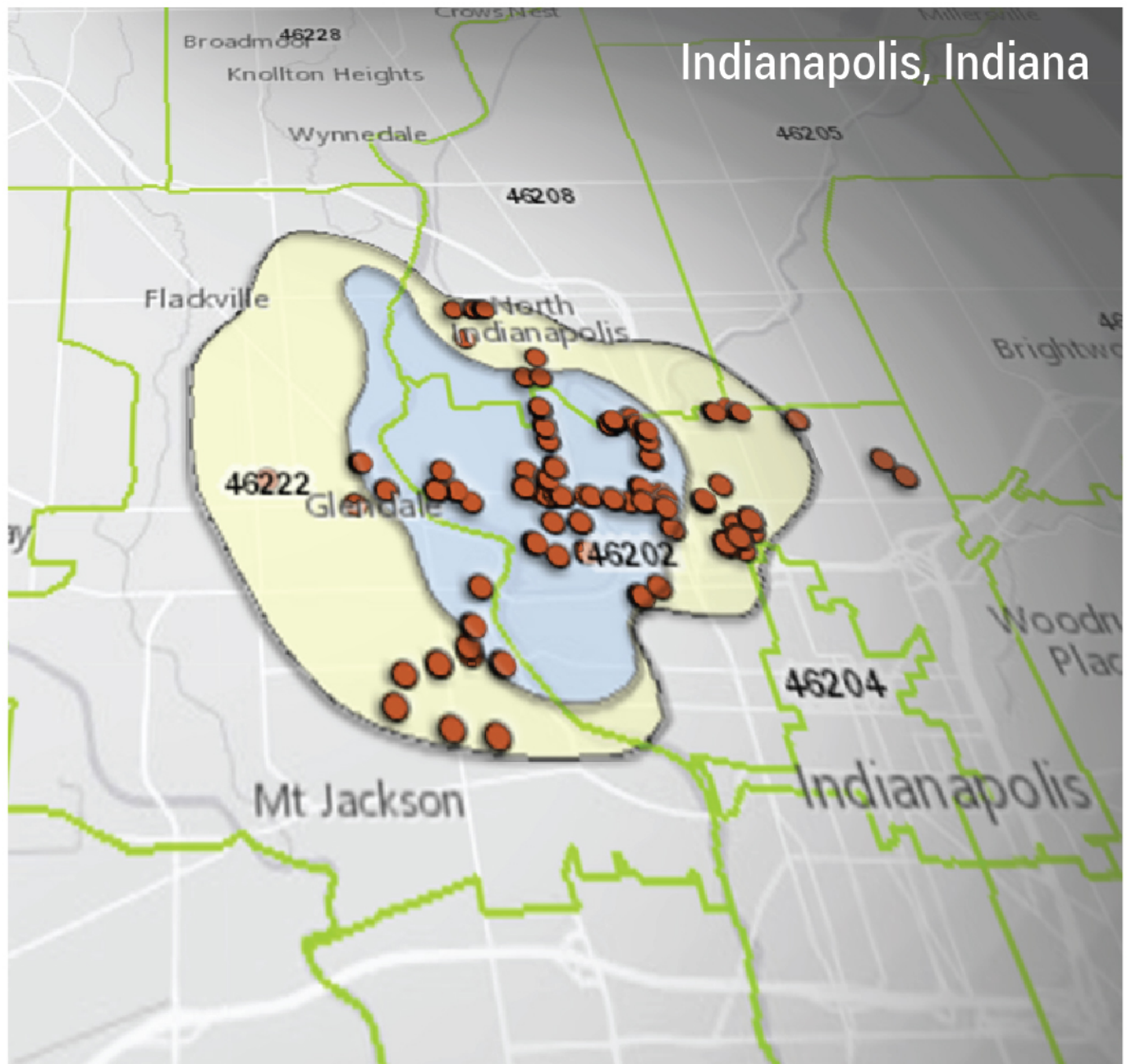




Annual Report to EPA on Site 0153

“... protecting Indy's underground drinking water ...”



January 2019

Table of Contents

SITE OVERVIEW	3
IDEM’s ACTIVITIES SINCE TAKING THE LEAD	4
COMMUNITY CONCERNS	4
Ensuring Safe Drinking Water.....	4
Limiting the Loss of Brownfield Funding and Preserving Development Opportunities.....	6
Reconciling Historic Contamination with Development	6
The Resulting Community Involvement Plan	7
INVESTIGATION AND CLEANUP	7
TECHNICAL ASSISTANCE GRANT.....	8
NATURAL RESOURCE TRUSTEES.....	9
FUNDING	9
COMMUNITY RESOURCES AND CONTACTS.....	9

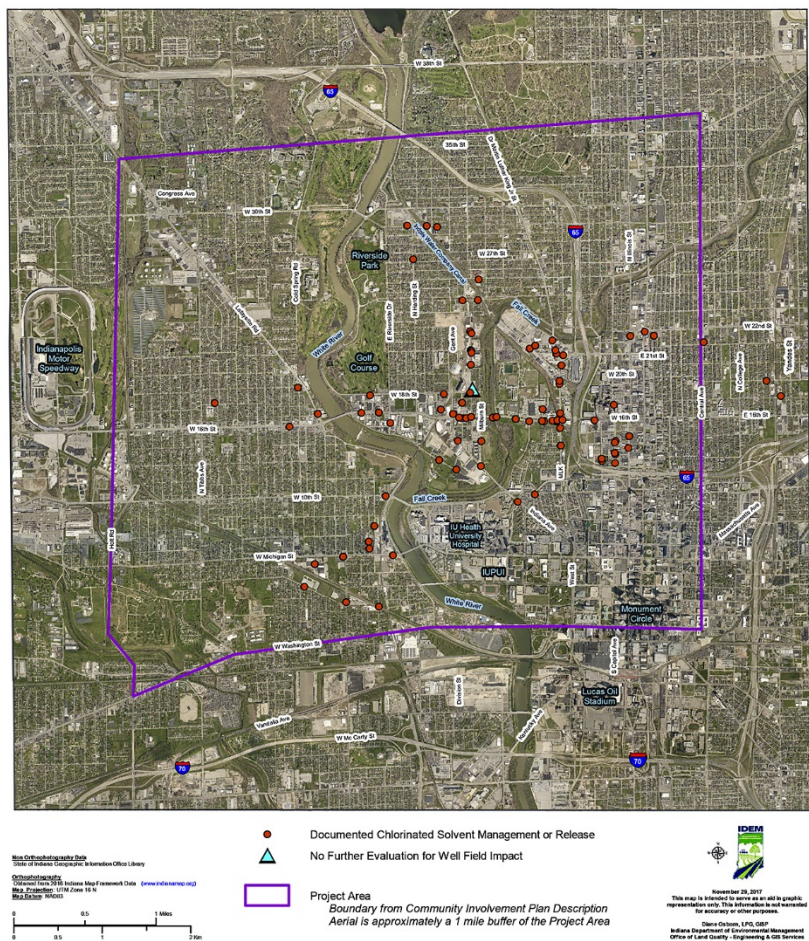


SITE OVERVIEW

Citizens Water operates the public drinking water supply for the city of Indianapolis. In 2013, Citizens Water notified the Indiana Department of Environmental Management (IDEM) that low levels of chlorinated solvents had been detected in the “raw,” untreated underground water at certain wells located within its Riverside and White River wellfields. In 2014, IDEM sampled and found low levels of five chlorinated solvents¹ in five of the 19 water production wells. All levels in the raw water remain below the maximum contaminant levels (MCLs) allowed by the United States Environmental Protection Agency (EPA) under the Safe Drinking Water Act (SDWA).

EPA designated the Riverside groundwater contamination as “Site 0153” and proposed it for inclusion on the Superfund National Priorities List. In response to public sentiment and updated information from Citizens Water, IDEM subsequently requested that EPA defer listing the site on the Superfund National Priorities List. On June 8, 2017, EPA and IDEM entered into a Memorandum of Agreement in which Site 0153 was deferred to IDEM’s State Cleanup Program as a Superfund alternative. IDEM has since taken the lead to investigate the source of these low levels of chlorinated solvents in the underground water and will later propose and implement any necessary cleanup activities.

Site 0153 Project Area



In general, the investigation area for Site 0153 is bordered by 35th Street to the north, Holt Road to the west, Washington Street to the south, and Central Avenue to the east. Within this area, IDEM initially identified 89 sites where chlorinated solvents may have been used at some time.

¹ Tetrachloroethylene, trichloroethylene, 1,1,1-trichloroethane, cis-1,2-dichloroethylene, and vinyl chloride.

IDEM's ACTIVITIES SINCE TAKING THE LEAD

As of December 2018 IDEM has:

- Created a project website with an interactive map. www.idem.IN.gov/Site0153. The website and interactive map are updated with ongoing information about the investigation and cleanup.
- Mailed 13,400 letters and fact sheets (in English and Spanish) to residents and businesses located within the site.
- Issued notice of liability letters for 17 sites and over 118 information request letters.
- Reviewed data and begun evaluations of most of the initial 89 sites, and completed investigations of four sites.
- Completed the Community Involvement Plan, and continue to meet with environmental groups and residents regarding improvements to communication.
- Held several public information meetings in various neighborhoods within Site 0153.
- Scheduled bi-monthly stakeholder meetings with the city of Indianapolis, Citizens Water, and the Marion County Public Health Department to coordinate complete responses to public concerns.
- Solicited and awarded a Technical Assistance Grant to a coalition formed by several neighborhood organizations.
- Maintained a public document repository on the 12th Floor of Indiana Government Center North.

As a result, 77 of the initial 89 sites are being addressed (to some extent) in one of IDEM's remediation programs. IDEM will hold another public information session on February 21, 2019, post a video of this presentation on the website, and thereafter hold additional public meetings upon request.

COMMUNITY CONCERNS

Through multiple meetings and discussions with the community regarding Site 0153, community members have shared the following concerns with IDEM.

Ensuring Safe Drinking Water

IDEM and Citizens Water continue to monitor the finished drinking water and raw underground water at the municipal production wells for chlorinated solvents (and other chemicals as required by EPA). Citizens Water has committed to taking any production well where raw underground water exceeds an MCL out of service and only return it to service once raw water becomes, or is treated to, below the MCL (drinking water standards), and ensuring through

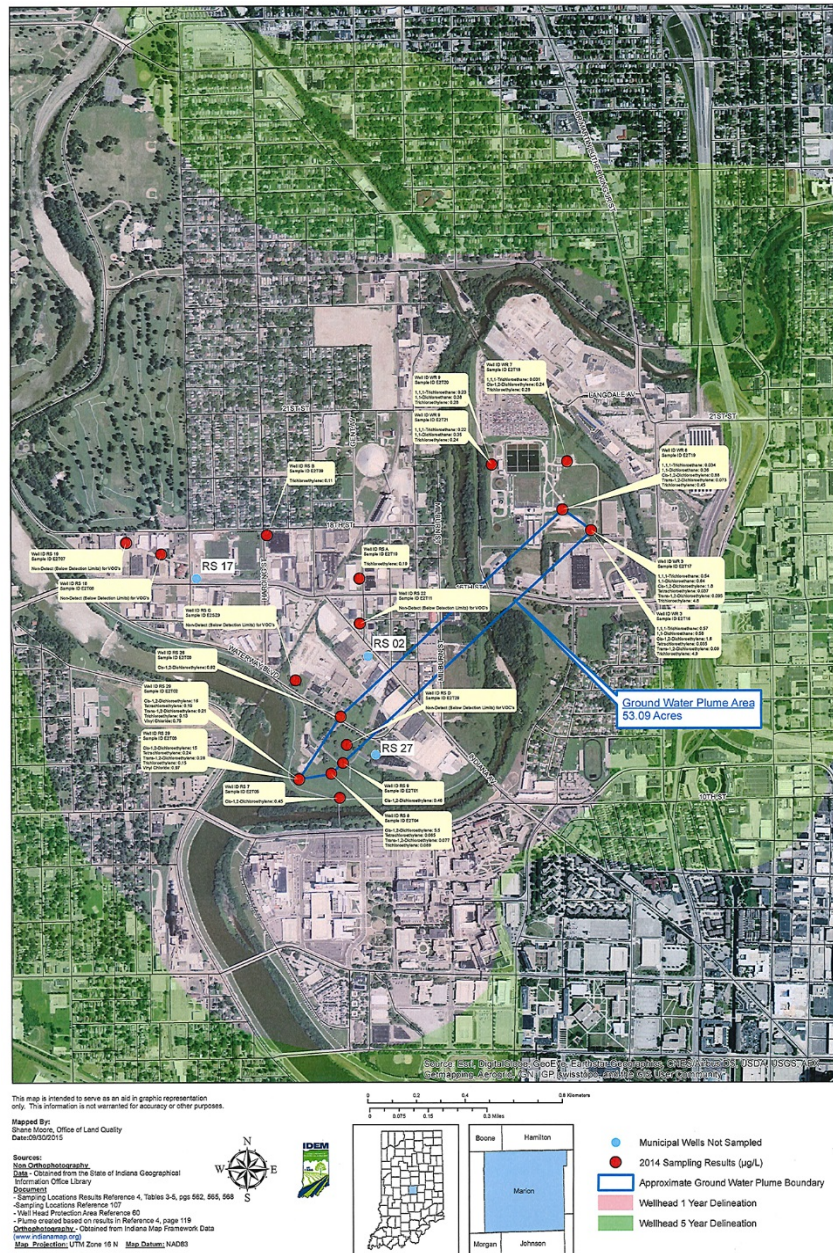
monitoring it remains safe to consume.

As part of its drinking water operations, Citizens Water combines the underground water from its wellfields with surface water from the Indianapolis Central Canal and then treats and filters all of the water before sending it to customers. This is the finished drinking water. Citizens Water routinely tests the finished water for over 300 constituents, including chlorinated solvents. Citizens Water has and will continue to test the water of homes receiving municipal water upon request and at no cost to the property owner. To date:

- 1) No chlorinated solvents have ever been detected in the finished water.
- 2) All chlorinated solvent levels in the raw underground water from active production wells remain below the MCLs even before treatment.
- 3) Ongoing quarterly testing confirms that the finished drinking water Citizens Water delivers to homes and businesses meets all Safe Drinking Water Act requirements.

Test results and other information can be found on the state's Drinking Water Watch website at myweb.IN.gov/IDEM/DWW/index.jsp. Though not required by law to do so, Citizens Water voluntarily decided to shut down one of its 19 production wells based on raw, underground water monitoring results sampled at the production well.

Riverside Ground Water Plume Boundary Map



Seven private wells have been identified in the Site 0153 investigation area. The Marion County Health Department (MCHD) has investigated all of these wells and stays in contact with the property owners. MCHD will work to continue to address private well contamination issues and conduct sampling where needed.

In March 2018, IDEM participated in split sampling with Citizens Water of the then operating production wells within Site 0153. IDEM's separate sampling and analysis confirmed that all chlorinated solvent levels were below MCLs.

Limiting the Loss of Brownfield Funding and Preserving Development Opportunities

By law, U.S. EPA's brownfield funding is automatically withdrawn when a site is proposed for the National Priorities List (NPL). Residents and businesses want to know whether they are within the boundaries of the proposed listing of Site 0153. In September 2017, IDEM sent a letter to U.S. EPA confirming that, for purposes of NPL listing, the site is limited to a narrow band where the known plume is located. U.S. EPA's brownfield funding for 2018 was opened up in September. IDEM's letter confirms the limited boundaries within which brownfield funding is no longer available within Site 0153 and preserves this funding elsewhere on the site.

Reconciling Historic Contamination with Development

IDEM is committed to working with all stakeholders to ensure that proposed area developments may go forward while also responsibly addressing any historic contamination that might be encountered.

In particular, both the city of Indianapolis and the surrounding neighborhoods are excited by a major development known as 16 Tech. As one of the largest talent attraction, retention and development opportunities in Indianapolis' history, 16 Tech will redevelop 60 acres of land within the Site 0153 project boundary into an innovation district for scientific research, technology innovation, and entrepreneurial activity. Additional information can be found at www.16tech.com.

Six of the City's drinking water wells are located within the 16 Tech footprint. To facilitate its development, 16 Tech is funding the relocation of these six drinking water wells to new locations both cross gradient and away from the historic industrial activity within Site 0153. The relocation of these six wells greatly reduces the threat posed by the legacy of chlorinated solvents from former industrial sites in the Site 0153 area. In addition, 16 Tech is sharing all available environmental information on properties within its footprint; information which assists IDEM in its investigation both within the 16 Tech footprint as well as the surrounding areas. 16 Tech is also committed to remediating any source areas which might be identified in the future on the land owned by 16 Tech, if they pose a threat to either the public or the City's water supply. Although IDEM's investigation is not finished, to date no such source areas have been identified on the land owned by 16 Tech.

IDEM's investigation of Site 0153 will continue to accommodate 16 Tech's development along Indiana Avenue between 10th Street and 16th Street while also addressing any historic contamination that might remain on the site.

The Resulting Community Involvement Plan

In recognition of the community's concerns, and in response to the community's interest in Site 0153, on December 8, 2017, IDEM published notice of its Community Involvement Plan (CIP). The goals of IDEM's community involvement plan are to:

- Identify and respond to community concerns, questions, and information needs.
- Give the public accessible, accurate, timely, and understandable information about the project as it progresses.
- Assist the public in understanding the decision-making process during the investigation, project design and cleanup of contamination, and the community's role in that process.
- Ensure adequate time and opportunity for the public to give informed and meaningful input.
- Respect and fully consider public input throughout the process.

The Community Involvement Plan was finalized in early 2018. IDEM has since met with residents and other stakeholders to consider further improvements to both the CIP and IDEM's communication with the public in general.

INVESTIGATION AND CLEANUP

In June 2017, IDEM began Phase I of the Remedial Investigation, which focuses on systematically investigating the 89 sites identified as potential sources of chlorinated solvents. IDEM has sent 118 requests for information and has sent special notice of liability letters to 17 sites. To date, 77 of the initial 89 properties have identified, addressed, or are addressing the contamination on their property (or some portion of that contamination) in either IDEM's Voluntary Remediation Program, the Indiana Finance Authority's Indiana Brownfields Program (through due diligence investigation and Comfort Letter issuance), or IDEM's State Cleanup Program. Along the way, other sites have since been discovered and added to the initial list of 89.

In addition, other sites have been addressed in IDEM's Underground Storage Tanks (USTs) Program, where the contaminant of concern is typically petroleum, not chlorinated solvents. Unless there has been an unaddressed release of chlorinated solvents, these UST sites may have been listed among the original 89 potential sources, but will not be counted as part of the Site 0153 investigation in the future. However, the data from these sites provides further information about the geology and hydrology at those locations within Site 0153.

At some point in the investigation, IDEM will have enough information to begin preparing a conceptual site model of a proposed Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) protective cleanup. The agency is not yet at that point. In the meantime, IDEM is meeting the terms of the Memorandum of Agreement with U.S. EPA. Here is an update of IDEM's activities regarding the first three tasks listed in the table from the Memorandum of Agreement:

Task		Target Completion
1	Complete Community Involvement Plan	Public Notice 12/17; Finalized 2/18
2	Begin Phase I Remedial Investigation (RI)	Began investigation in June 2017
3	Prepare Removal Work Plan as necessary	Based upon investigation to date, no immediate removals are warranted.
Upcoming Tasks		
4	Complete additional Remedial Investigation as necessary	Following submittal of Remedial Investigation Report and IDEM request for additional RI
5	Complete Human Health and Ecological Risk Assessment (HHERA)	Six months after final RI information is gathered
6	Complete Feasibility Study	90 days after RI and HHERA are completed
7	Proposed Remedial Action Public Comment Period	30 days from publication of draft Proposed Plan
8	Record of Decision	180 days after Public Comment Period
9	Remedial Design	One year from publication of Record of Decision
10	Implement Remedial Action	Six months from final Remedial Design/Technical Specifications

TECHNICAL ASSISTANCE GRANT

IDEM is committed to providing funding to the neighborhoods for the purpose of hiring a technical assistance consultant. IDEM began an open grant application process in July 2017. Two competing grant applications were submitted in September 2017, representing the collective efforts of over 20 local groups.

In October 2017, IDEM announced it would proceed with a Technical Assistance Grant (TAG) with a coalition of several neighborhood organizations and churches resulting in the non-profit now known as the Indianapolis Environmental Equity Council, Inc. Over the next four years, the TAG will be implemented as the IEEC identifies precisely what TAG work is of interest to the local community. Details about the TAG process can be found on the project [website](http://www.idem.IN.gov/cleanups/pages/site0153/files/0153_tag_notice.pdf) and at the following link: www.idem.IN.gov/cleanups/pages/site0153/files/0153_tag_notice.pdf.

NATURAL RESOURCE TRUSTEES

IDEM has provided notice to the state of Indiana Natural Resource Trustees, who act on behalf of the public for determination of damage to Indiana natural resources, including ground and surface water and the supported plant and animal ecosystems, and implement restoration of damaged natural resources. The Natural Resource Trustees work in close coordination with their federal counterparts. IDEM has committed to keeping the state of Indiana Trustees apprised of any releases at the site that injure or may injure natural resources. While they continue to reserve their rights to do so, at this point the Indiana Trustees do not foresee asserting claims at Site 0153.

FUNDING

IDEM is funding the investigation of Site 0153 with state funds. No Superfund trust money is being used.

In 2017, IDEM began with an initial budget appropriation for Site 0153. As of the end of 2018, IDEM has sufficient funds remaining to continue the Site 0153 investigation through 2019.

COMMUNITY RESOURCES AND CONTACTS

Information Repositories

IDEM maintains a website and interactive map for Site 0153 at www.idem.IN.gov/Site0153.

All documents related to this project can be viewed at:

IDEM - Office of Records Management
Indiana Government Center North, Room 1207
100 North Senate Ave.
Indianapolis, Indiana 46204
(317) 232-8667
idemfileroom@idem.IN.gov

Site 0153 Stakeholders Include:

Indiana Department of
Environmental Management

Ryan Groves

Senior Environmental Manager

State Cleanup Program

(800) 451-6027

site0153@idem.IN.gov

Citizens Water

Dan Moran

Director of Water Quality,

System Control and Planning

(317) 941-7155

DMoran@citizensenergygroup.com

City of Indianapolis

Piers Kirby

Brownfields Program Manager

(317) 327-5131

Piers.Kirby@Indy.gov

Marion County Public Health Department

Pam Thevenow

Water Quality & Hazardous Materials

Administrator

(317) 221-2266

pthevenow@marionhealth.org

U.S. Environmental Protection Agency,
Region 5

Katherine Thomas

Remedial Project Manager

(312) 353-5878

Thomas.Katherine@epa.gov