

Community Involvement Plan

0153 Ground Water Contamination Site



Indianapolis, Indiana

June 2018

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Table of Contents

INTRODUCTION.....	3
SITE OVERVIEW.....	4
COMMUNITY CONCERNS.....	7
COMMUNITY INVOLVEMENT GOALS AND ACTIVITIES.....	12
TIMEFRAME FOR CONDUCTING COMMUNITY INVOLVEMENT PLAN ACTIVITIES.....	15
APPENDIXES.....	16



INTRODUCTION

The Indiana Department of Environmental Management (IDEM) prepared this Community Involvement Plan (CIP) to engage and support the community affected by the 0153 Ground Water Contamination Site (Site 0153) located in Marion County, Indianapolis, Indiana.

IDEM wants the members of the community to know and understand when and how they can participate in decision-making during the cleanup activities at this site. IDEM is committed to promoting effective and meaningful communication with the community and wants to make sure the community's concerns and information needs are considered as activities at the site progress.

This CIP identifies current community concerns and presents a plan to enhance communication between local residents and IDEM as the investigation and cleanup of the site progress. It also provides background information about the site and outlines how IDEM will continue to inform the public and local officials about progress at the site and to encourage community involvement during the cleanup.

This document describes IDEM's plan for addressing community concerns and keeping residents informed and involved in cleanup activities. The agency will use it as a guide to communicate with and involve residents, businesses, neighborhood organizations, and local government in the affected area.

IDEM will implement a cleanup that is fair and equitable for all environmental stakeholders. All members of the public shall be treated equally and fairly with respect to the development, implementation, and enforcement of environmental laws, regulations and policies.

The CIP is a working document that will evolve as the investigation and cleanup continue and input is received from the community. It is intended to be flexible, adaptable, and used as a guideline for IDEM's communication with the community.

If you have questions or suggestions concerning this plan, please contact:

Ryan Groves
Senior Environmental Manager
State Cleanup Program
Office of Land Quality
Indiana Department of Environmental Management
(800) 451-6027
site0153@idem.IN.gov

Goals of IDEM's community involvement program:

- 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
- Give the public accessible, accurate, timely, and understandable information about the project as it progresses
- Ensure adequate time and opportunity for the public to give informed and meaningful input
- Identify and respond to community concerns, questions, and information needs
- Respect and fully consider public input throughout the process

SITE OVERVIEW

Site 0153 is located in Indianapolis, Marion County, Indiana. The focus of this project will be the investigation, cleanup, and monitoring of underground water contamination affecting the municipal wells of Indianapolis' Riverside and White River wellfields.

In 2013, IDEM received notice from Citizens Energy Group (Citizens) 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 testing found low levels of contamination in five of the 19 water production wells.

Chlorinated solvents are synthetic chemicals that were frequently used in manufacturing and dry cleaning. The specific chlorinated solvents found in the raw, underground water include tetrachloroethylene, trichloroethylene, cis-1,2-dichloroethylene, vinyl chloride and 1,1,1-trichloroethane. Health information about these chemicals can be found at www.idem.IN.gov/Site0153.

Although low levels of chlorinated solvents have been detected in raw water samples from a small number of Citizens' production wells, testing has confirmed that finished drinking water being delivered by Citizens to homes and businesses meets all Safe Drinking Water Act requirements. Test results and other information can be found on the State Drinking Water Information System website at myweb.IN.gov/IDEM/DWW/index.jsp.

Initially proposed for the U.S. Environmental Protection Agency's (U.S. EPA's) National Priorities List, Site 0153 was deferred to IDEM's State Cleanup Program via a Memorandum of Agreement with U.S. EPA Region 5 in June 2017. In a deferral, U.S. EPA steps aside to allow the state to perform a cleanup substantially similar to what would otherwise be implemented by U.S. EPA. For Site 0153, the agreement provides that:

- IDEM will pursue the cleanup per a schedule of tasks and target dates.
- IDEM will make all non-privileged information available to U.S. EPA and the public.

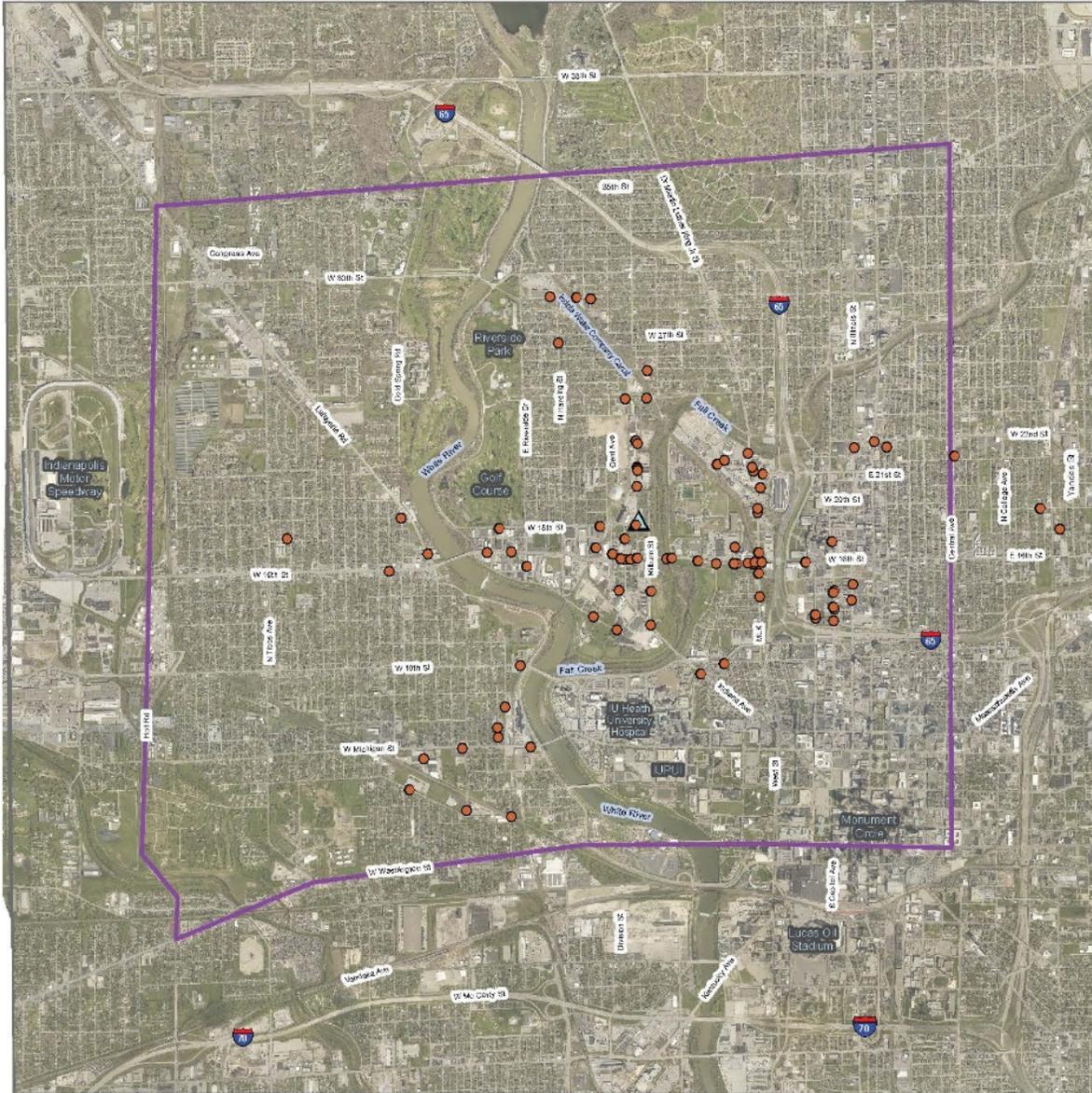
- U.S. EPA will review IDEM's annual reports.
- U.S. EPA will review IDEM's proposed remedial action.
- IDEM will complete the cleanup and certify the completion to U.S. EPA.

Along the way, U.S. EPA retains the right to terminate the deferral at any time if certain conditions are not met, and U.S. EPA reserves the right to take any action it may have otherwise taken before the deferral.

IDEM has since taken the lead to investigate the source of these low levels of chlorinated solvents in the underground water and will then propose and implement any necessary cleanup activities.

In general, the investigation area for Site 0153 is bordered by 35th St. to the north, Holt Rd. to the west, Washington St. to the south, and Central Ave. to the east. Within this area, IDEM has identified 89 sites where volatile organic compounds (VOCs) may have been used. Fifteen sites are already being addressed in one of IDEM's remediation programs and their potential sources have either been addressed or are on track to do so.

Site 0153 Project Area



Map of the State of Indiana
 State of Indiana Geographic Information Office Library
 Orthorectification
 Created from 2016 Indiana Map Framework Data (www.indianamap.org)
 Map Projection: UTM Zone 16 N
 Map Datum: NAD83

-  Documented Chlorinated Solvent Management or Release
-  No Further Evaluation for Well Field Impact
-  Project Area
 Boundary from Community Involvement Plan Description
 Aerial is approximately a 1 mile buffer of the Project Area



November 28, 2017
 This map is intended to serve as an aid in graphic representation only. This information is not warranted for accuracy or other purposes.
 Dawn O'Brien, I.P.G., GISP
 Indiana Department of Environmental Management
 Office of Land Quality - Engineering & GIS Services

COMMUNITY CONCERNS

IDEM has conducted multiple meetings and discussions with the community regarding Site 0153 prior to receiving the letter of deferral from U.S. EPA. In addition, the information gathered by IDEM during site investigation was made public during a formal public comment period in 2016. IDEM has used the meetings, discussions, and public comment period to determine the needs of the community and to develop this CIP.

Since taking the lead in June 2017, IDEM has:

- Sent an initial letter and fact sheet (in English and Spanish) to 13,400 residents and businesses located within the site.
- Held two public information meetings (Aug. 17 & Nov. 15) and is committed to holding quarterly meetings in the future.
- Solicited and awarded a Technical Assistance Grant to a coalition being formed by several neighborhood organizations and churches.
- Held several stakeholder meetings with the city of Indianapolis, Citizens Energy, and the Marion County Public Health Department to coordinate complete responses to public concerns.

This section focuses on the concerns and questions community members shared with IDEM about Site 0153 during multiple meetings held in 2016 and 2017.

Ensuring Safe Drinking Water

IDEM and Citizens continue to sample and monitor the drinking water for contaminant levels and make changes to operations as needed to ensure that the drinking water remains safe to consume. Citizens and IDEM compare the contaminant levels in the drinking water to the Safe Drinking Water Act maximum contaminant levels (MCLs). The Safe Drinking Water Act is the federal law establishing regulations on the safety of drinking water. The MCLs are the risk and toxicologically based standards set by U.S. EPA under the Safe Drinking Water Act and are used as the legal threshold limit of chemicals allowed to be in drinking water. If a chemical is found in drinking water exceeding its MCL, then the drinking water is deemed unsafe and corrective measures must be implemented.

To provide drinking water to the city, Citizens mixes the underground water with surface water from the Indianapolis Central Canal and then treats and filters all of the water before sending it to customers. Citizens routinely tests the finished water for over 300 constituents, including chlorinated solvents.

To be proactive, Citizens decided to shut down one of its 19 production wells based on raw, underground water monitoring results. The testing of this well revealed a chlorinated solvent chemical, trichloroethylene, nearing the MCL limit. Even though the chemical did not exceed

the MCL, Citizens and IDEM acted proactively to remove the well from service to ensure that no chemical entered the finished drinking water at an unsafe level. Citizens will continue to routinely test the finished drinking water for over 300 contaminants. Along with Citizens, IDEM will review the water sampling and analysis and will address any need for future corrective measure actions on specific wells. The finished water sent to residents and businesses continues to meet all Safe Drinking Water Act standards and is safe to consume.

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 will serve to commemorate the limited boundaries within which brownfield funding is no longer available within Site 0153 and preserve this funding elsewhere on the site (See Appendix B).

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

The following requests (shown in bold below) were made by the Riverside Civic League:

- **A live and interactive map listing all known or suspected contaminated sites in the area of concern.**

IDEM has created an interactive map which is available on the project website at www.idem.IN.gov/Site0153. This map provides links to information on potential contamination sources and will be updated as the project progresses.

- **IDEM will identify any contaminant exposure pathways (ground water and vapor intrusion) and devise plans to eliminate those pathways.**

IDEM, through its investigation in the area, will use data to determine whether there are possible ways that citizens could be exposed to contaminants. IDEM will make that information available to the public on the project website, in IDEM's Virtual File Cabinet (vfc.idem.IN.gov), and through a public document repository at the Indianapolis Public Library's Flanner House Branch. IDEM will eventually develop a Conceptual Site Model to identify the extent of VOC contamination, sources, and impacts from the contamination, and develop one or more remediation plans designed to manage or eliminate any contaminant exposure pathways.

- **IDEM, Citizens Energy Group, and/or the city of Indianapolis will fund at their expense one independent environmental attorney and one consultant specifically assigned to work with affected neighborhoods to represent their concerns throughout the process.**

The state of Indiana is committed to providing funding to the neighborhoods for the purpose of hiring a technical assistance consultant. In October 2017, after an open grant application process, IDEM agreed to proceed with a Technical Assistance Grant (TAG) for a coalition being formed by several neighborhood organizations and churches. Over the next four years, the TAG will be implemented upon the initiative and instructions of this neighborhood coalition. Details about this process can be found on the project website and at www.idem.IN.gov/cleanups/pages/site0153/files/0153_tag_notice.pdf.

- **Any property owner in the defined area shall be entitled to drinking water testing if desired, and all properties within five blocks of a contaminated soil site shall be offered at no cost vapor intrusion testing. The results of any testing will be explained to them.**

Homeowners receiving municipal water can contact Citizens and ask for their water to be tested. Citizens will conduct testing of water at no cost to the property owner. The Marion County Public Health Department will conduct water sampling at homes with private drinking water wells. IDEM will follow a process of first testing soils in areas under investigation to determine the possible threat of vapor intrusion and, if necessary due to the existence of vapors in soils, will conduct vapor intrusion testing. IDEM will work to ensure that contaminated properties are cleaned up to appropriate environmental standards.

- **Three soil samples shall be taken in the public right-of-ways in each grid. The sample site selection shall be such as to allow accurate mapping of all the data on the interactive map. The right-of-way sample may be waived if a property owner voluntarily allows sampling on their property.**

IDEM will commit to conducting a thorough investigation involving data collection and sampling, as necessary, to determine sources of contamination and whether or not human exposure to contaminants is occurring. The location and number of samples will be determined by the results of that investigation.

- **The city of Indianapolis will, in coordination with IDEM, work to conduct soil sample testing on city-owned properties in the affected area including those held by Renew Indianapolis, Marion County, the Department of Metropolitan Development, or other government agencies.**

IDEM, the city of Indianapolis, and the Marion County Public Health Department will coordinate work and appropriate activities on city-owned properties.

- **Any property owner in the defined area shall be entitled to soil testing if desired, and all properties within five blocks of a contaminated site shall be offered at no cost vapor intrusion testing. The results of any testing will be explained to them.**

IDEM will commit to conducting appropriate investigations, including soil testing, where necessary on properties considered by IDEM as potential sources of the VOC contamination in ground water. The Marion County Public Health Department has committed to conduct surface soil testing for lead on private property.

- **Private residence property owners shall not be required to bear the burden of any remediation for soil or air contamination.**

IDEM will pursue parties who the state considers responsible for contamination in accordance with state and federal laws to ensure contaminated sites are cleaned up.

- **Any private wells currently in existence or drilled in the future shall be tested at no cost a minimum of four times per year. For those using private wells for drinking water, IDEM will offer one free tap water test. All data gathered in these tests will be added to the map.**

To date, seven private wells have been identified in the Site 0153 investigation area. The Marion County Public Health Department has investigated all of these wells and continues to stay in touch with each property owner. IDEM and the health department will work to continue to identify and address private well contamination issues and conduct sampling where needed.

- **Private residential property owners will not be held financially liable for remediation and abatement of contamination found on their properties. Commercial sites will be given an opportunity to enter into voluntary remediation programs or to seek funding through U.S. EPA Brownfields Program grants.**

IDEM will pursue parties who the state considers responsible for contamination in accordance with state and federal laws to ensure contaminated sites are cleaned up.

Brownfield grants are administered by the state or U.S. EPA either through a grant or loan process. Low interest loans or grants are based on applications received by the program to clean up and remediate former commercial and industrial sites. The allocation of funds is dependent on the applications received and approved by both the state and U.S. EPA.

By law, U.S. EPA brownfield funding is no longer available when a site is proposed for U.S. EPA's National Priorities List. To preserve the availability of brownfield funding to the greatest extent allowed by law, IDEM sent a letter to U.S. EPA confirming that any mandatory loss of brownfield funding is limited to a narrow band of property. Only a few of the homes and businesses within Site 0153 fall within this narrow band where brownfield funding is no longer available.

- **Funds designated for this area shall be required to be spent solely in this area and cannot be re-appropriated for other areas. Funds will be used on a basis of imminent danger, highest risk, residential site, and most likely for development in that order of importance.**

IDEM funds designated to perform cleanup activities specifically for this area will be used only for this area. The order of site cleanups will be based on information available at the time and on likely exposure to contaminants along with health risks associated with that exposure.

- **IDEM will keep the community informed on the status of all sites in reasonable proximity of Site 0153 that are currently being addressed by the agency's State Cleanup Program and Voluntary Remediation Program (VRP).**

The state and the city have committed to communicate with the community on the activities at Site 0153 in several ways including a website, an interactive map, broad-based mailings to residents, targeted emails to those who sign up to receive information, and public meetings. IDEM has committed to meeting on a quarterly basis to provide updates. Residents and interested parties can sign up to receive email updates on the website at www.idem.IN.gov/Site0153. To be added to the mailing list, contact IDEM at site0153@idem.IN.gov or (800) 451-6027.

- **IDEM will be responsible for issuing a quarterly mailing in plain language (in English and Spanish) that updates all residents in the affected area on the status of the cleanup, where to get further information, and how to get concerns addressed.**

IDEM is committed to communicating with residents on the status of its activities in a variety of ways. IDEM recognizes that not all residents have access to the internet or electronic communications and is therefore committed to providing a quarterly mailing. IDEM sent an initial letter and fact sheet (in English and Spanish) to 13,400 residents and businesses located within the site. To receive additional updates, residents will need to sign up on the website or contact IDEM at site0153@idem.IN.gov or (800) 451-6027 to be added to the mailing list.

- **IDEM will hold regularly scheduled public meetings, prepare and disseminate materials tracking the Community Involvement Plan's progress, and maintain a dedicated webpage to provide the local community with easy access to the materials, the public meeting schedule, and other information related to implementation of the plan.**

IDEM has established a website and published information at www.idem.IN.gov/Site0153. The agency has committed to meeting on a quarterly basis with residents to provide site updates. IDEM will host quarterly information sessions at different locations based upon community input,

or will conduct a quarterly information session as part of a regularly scheduled community meeting of the community group receiving the Technical Assistance Grant.

COMMUNITY INVOLVEMENT GOALS AND ACTIVITIES

This section highlights IDEM's goals and activities for conducting outreach to keep community members informed and involved during the cleanup process.

To be effective, a community involvement program must be designed to meet the community's need to receive information in a timely manner and accommodate the community's interests and its willingness to participate in decision-making processes. IDEM must also share information in a manner that is practical for IDEM and convenient for the entire community. This information sharing should also be provided to the community in languages necessary for the public to comprehend.

IDEM will actively engage the community in decisions regarding the cleanup of Site 0153. IDEM developed this Community Involvement Plan to facilitate communication between the community and IDEM and to address key concerns and questions raised during public meetings.

To meet the needs of the community, to respond to information obtained during community interviews and meetings, and to meet federal requirements, IDEM has established the following objectives for community involvement:

- Enlist the support, coordination, and involvement of local officials and community leaders
- Monitor community interest and respond accordingly
- Keep the community informed of ongoing and planned site activities
- Explain technical site activities and findings in an understandable format
- Get public input on key decisions
- Change planned activities, where warranted, based on community input
- Update IDEM's website regularly with useful information for the community
- Hold quarterly public meetings within the community to give all residents an opportunity to attend and provide feedback

To accomplish these goals, IDEM will do the following:

- **Establish a toll-free number and email for residents to ask questions and receive information.** As questions or concerns arise, please email site0153@idem.IN.gov or call (800) 451-6027, press 6 and ask to speak with the Site 0153 project team. The senior environmental manager on this project is Ryan Groves.

- **Maintain communication with local officials.** IDEM will continue to maintain communication with local officials throughout the cleanup process including regular stakeholder meetings and email updates.
- **Share site information on the internet.** Site information is provided on IDEM's website at www.idem.IN.gov/Site0153 and will be updated as new information becomes available.
- **Update and maintain the site mailing list and email group.** A mailing list and email group comprised of local residents, organizations, businesses, and officials have been established for the site. The mailing list and email group will be updated regularly to reflect address changes, changes in elected officials, and to add new people. To be added to the email or mailing list, please visit www.idem.IN.gov/Site0153 or call (800) 451-6027.
 - These mailing lists are for IDEM use only and will not be shared with outside entities.
- **Prepare and distribute written materials.** Fact sheets, letters, and updates summarizing current information about the site and describing upcoming activities will be posted on the website at www.idem.IN.gov/Site0153 and made available at quarterly meetings. The materials will be written in non-technical language. IDEM will convert milestone reports such as fact sheets, quarterly updates, and annual reports to Spanish. IDEM will include current contact information for project staff on all written materials and will notify the community of any contact information changes.
 - In addition to being shared with individuals on the site mailing lists, site updates are also placed in the information repository.
- **Establish and maintain a site-specific information repository.** Information repositories give residents local access to site information in forms that can be easily read, photocopied, or printed for future use. An online information repository is also available on IDEM's project website. IDEM has established a local information repository for the site at the following location:

Indianapolis Public Library, Flanner House Branch
2424 Dr. Martin Luther King, Jr. Street
Indianapolis, IN 46208
(317) 275-4370

 - Documents will include technical reports, the Community Involvement Plan, fact sheets, IDEM Site Investigation documentation, and other information. IDEM will add new documents as they become available.

- **Conduct public information sessions.** A public information session is an opportunity for IDEM to present specific information and a proposed course of action. Meetings will be held at least once per quarter and will consist of a presentation and project update followed by an open house where residents can meet with IDEM and other stakeholders one-on-one to discuss activities at the site.
- **Assist the community through a Technical Assistance Grant (TAG).** In October 2017, after an open grant application process, IDEM agreed to provide a TAG to a coalition being formed by several neighborhood organizations and churches. Over the next four years, the TAG will be implemented upon the initiative and instructions of this neighborhood coalition. Details about this process can be found on the project website and at www.idem.IN.gov/cleanups/pages/site0153/files/0153_tag_notice.pdf.
- **Evaluate community involvement and outreach efforts and make adjustments as needed.** This Community Involvement Plan is designed to consider site and community-specific factors as well as to comply with requirements of the Memorandum of Agreement. The objectives of the community involvement program for the site, and the specific activities to address these concerns described in this CIP, are based largely on information obtained during public meetings held in 2016 and 2017. IDEM recognizes that changes in community perceptions, information needs, and population demographics can occur over time. Such changes may require a revised approach to conducting community involvement activities. To determine whether the activities in this plan are achieving their intended objectives, periodic reviews will be done to determine whether other activities are needed or whether changes to current methods outlined in this plan are necessary. As the needs of the community change, IDEM will modify the community involvement strategies and address them in a CIP revision.

**TIMEFRAME FOR CONDUCTING
COMMUNITY INVOLVEMENT PLAN ACTIVITIES**

Community Involvement Activities	Timeframe
Maintain point of contact	Completed
Establish a toll-free number	Completed; publish on written materials and IDEM website
Maintain communication with local officials, agencies, and community residents	Ongoing
Share site information on the internet	Completed; update as needed
Update and maintain the site mailing list and email group	Completed; update as needed
Prepare and distribute fact sheets and site updates	Completed; update as needed
Establish and maintain a site-specific information repository	Completed; maintain as needed
Conduct public meetings, hearings, and information sessions	Ongoing quarterly meetings will be held
Place public notices	As needed
Evaluate community involvement and outreach efforts and make adjustments as warranted	Ongoing

APPENDIX A

LETTER OF DEFERRAL FROM U.S. EPA to IDEM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 12 2017

REPLY TO THE ATTENTION OF S-6J

Peggy Dorsey
Assistant Commissioner
Indiana Department of Environmental Management
Office of Land Quality
IGCN 11th Floor
100 N. Senate Avenue
Indianapolis, Indiana 46204

Re: Riverside Ground Water Contamination Site added to the Superfund State
Deferral Program

Dear Ms. Dorsey:

In accordance with the U.S. Environmental Protection Agency's "Guidance on Deferral of NPL Listing Determinations While States Oversee Response Actions" (OSWER Directive 9375.6-11) (May 1995) (Deferral Guidance), and the "Memorandum of Agreement between United States Environmental Protection Agency, Region 5 and Indiana Department of Environmental Management for the 0153/ Riverside Ground Water Contamination Site, Indianapolis, Indiana" (June 8, 2017) (MOA), EPA acknowledges agreement to defer final listing of the proposed Riverside Ground Water Contamination Site (Site) on the National Priorities List (NPL) while Indiana Department of Environmental Management (IDEM) oversees the remaining response actions at the Site. EPA agrees that IDEM has met the deferral criteria outlined in the Deferral Guidance and that Site deferral is appropriate at this time. The Site was added to the Superfund State Deferral Program effective the date of the signed MOA, June 8, 2017.

The MOA specifies the plans and expectations of each agency at the Site and memorializes agreements necessary to ensure that the response actions undertaken at the Site are substantially similar to actions otherwise taken under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the National Contingency Plan (NCP). Once the Site response actions are successfully completed it is expected that the EPA will have no further interest in considering the Site for final listing on the NPL and the Site will be de-proposed from the NPL.

As described in detail in the MOA, IDEM has responsibility, with minimal EPA involvement, to provide for a timely CERCLA-protective cleanup under state authority and to support the public's right of participation in the decision-making process. EPA and IDEM agree that a deferral should address the Site sooner than, and at least as quickly as, EPA would expect to respond. The EPA's role will generally be limited to review of IDEM's semiannual and annual reports and consultation on the proposed remedy. However, the EPA may request reports, data or

other documentation related to the remedial activities at the Site, as it deems appropriate, or arrange for IDEM to provide certain draft documents for EPA review as they are prepared. The Superfund Program will not provide financial assistance for site activities to the IDEM or the community during the deferral. In the event that community members request that the EPA reconsider deferral of the Site or request the EPA's intervention in response actions, the EPA agrees to meet with IDEM to discuss the community concerns and to review the response actions in light of the EPA's Deferral Guidance, and make a decision regarding whether terminating the deferral is warranted.

Once IDEM considers the response action at the Site to be complete, it will certify to EPA, any affected Tribal Governments with which it has MOAs, and the affected community that the remedy has been successfully completed and intended cleanup levels achieved. As part of the certification, IDEM will submit for EPA review response action completion documentation substantially similar to that described in the OSWER Directive "Remedial Action Report; Documentation for Operable Unit Completion" (OSWER Directive 9355.0-39FS) (June 1992). EPA will review the certification and supporting information, and may choose to initiate a deferral completion inquiry to confirm the certification. If the response at the Site is confirmed as complete, the Site will not be further evaluated for NPL listing, unless EPA receives information of a release or potential release at the site which poses a significant threat to human health or the environment. Upon completion of response actions and confirmation by EPA, the Site will be archived in SEMS.

Please use the EPA contact information listed in the MOA to submit appropriate documents, including technical documents, semi-annual and annual progress reports, and proposed amendments to the MOA. If you have any questions or concerns about this letter or the MOA, please contact US EPA attorney, Nola Hicks at Hicks.Nola@epa.gov and at (312) 886-7949.

Sincerely,



Margaret M. Guerriero
Acting Director
Superfund Division

APPENDIX B

Site 0153 Boundary Confirmation Letter



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
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September 19, 2017

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Ms. Tanaka and Mr. Dufficy:

RE: Confirming Boundaries
Groundwater Plume Boundary Map Site
0153

When the Environmental Protection Agency (EPA) first proposed listing Site 0153 on the National Priority List (NPL), community members were concerned over the stigma attached to being designated as part of a Superfund site. Consequently, the Indiana Department of Environmental Management (IDEM) offered to take over the assessment and cleanup activities, and the public also supported IDEM taking the lead at Site 0153. On June 8, 2017, EPA entered into a deferral agreement with IDEM, and IDEM became the lead agency for Site 0153.

Site 0153 presents the less-than-typical situation of a contaminant plume from an unknown source; a plume that possibly stretches under numerous homes and businesses in an urban area and flows toward drinking water wellfields. Residents and businesses want to know whether they are within the boundaries of the proposed listing of Site 0153 on the NPL.

Pursuant to Hazard Ranking System (HRS) protocols for an underground plume from an unknown source, the contours of the plume itself are the boundaries of the proposed site. The site boundaries are drawn by connecting the dots between points of known contamination that are sufficiently above background contamination and lab analysis limitations. The attached Groundwater Plume Boundary Map for Site 0153 was thus created as the basis for the proposed NPL listing.

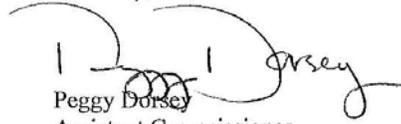
The boundaries of Site 0153 were also determined with EPA during several phone calls in May of 2016. At that time EPA and IDEM agreed that the one year time-of-travel line was far too large of an area to serve as the appropriate boundary for Site 0153. IDEM suggested that the boundary should be smaller than as depicted on the attached boundary map, but EPA made it clear that the polygon outlined on the attached Groundwater Plume Boundary Map for Site 0153 properly depicted the boundary of Site 0153 for scoring and listing purposes and IDEM ultimately agreed.

Once in the lead, IDEM began implementing an area wide solution which involves the community well beyond the boundary. Significant area wide activity has occurred since the June 9, 2017 deferral agreement with EPA, including:

- Using billing addresses provided by the local water company, IDEM mailed a public information letter introducing IDEM's cleanup, website and other information to more than 13,000 addresses within the 5 year time-of-travel;
- IDEM sent notice letters and information requests to some of the more than 80 suspected sources within the one year time-of-travel around Site 0153;
- IDEM updated the public at a meeting held on August 17, 2017;
- In July 2017, IDEM issued notice of a Technical Assistance Grant (TAG) with a September 15, 2017 application deadline, and held two public applicant information sessions in August 2017 for potential TAG applicants; and
- Through 2017, the data provided by the local drinking water company for the public drinking water wells continues the trend of stable or decreasing levels of the contaminants of concern.

However, having involved and advised the community well beyond the boundary of Site 0153, IDEM needs to reaffirm that, for purposes of the NPL listing, the boundaries are as depicted in the Groundwater Plume Boundary Map for Site 0153. Both IDEM and the community will be relying on the attached Groundwater Plume Boundary Map for Site 0153.

Sincerely,



Peggy Dorsey
Assistant Commissioner
Office of Land Quality

cc: Meredith Gramelspacher, Brownfields, General Council
Timothy J. Junk, IDEM, Office of Legal Council

Riverside Ground Water Plume Boundary Map
Indianapolis, Marion County, Indiana
Fig. 1-2



APPENDIX C

LIST OF CONTACTS

[Indiana Department of Environmental Management](#)

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State Cleanup Program
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site0153@idem.IN.gov

[City of Indianapolis](#)

Piers Kirby
Brownfields Program Manager
[\(317\) 327-5131](tel:(317)327-5131)
Piers.Kirby@Indy.gov

[Citizens Energy Group](#)

Dan Moran
Director of Water Quality, System Control and Planning
[\(317\) 941-7155](tel:(317)941-7155)
DMoran@citizensenergygroup.com

[Marion County Public Health Department](#)

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APPENDIX D
LIST OF COMMUNITY RESOURCES

IDEM Website

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

Information Repositories

All documents related to this project can be viewed at IDEM's main office in the Indiana Government Center North:

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

Documents can also be viewed at the following Indianapolis Public Library Branch:

Indianapolis Public Library, Flanner House Branch
2424 Dr. Martin Luther King, Jr. Street
Indianapolis, IN 46208
(317) 275-4370