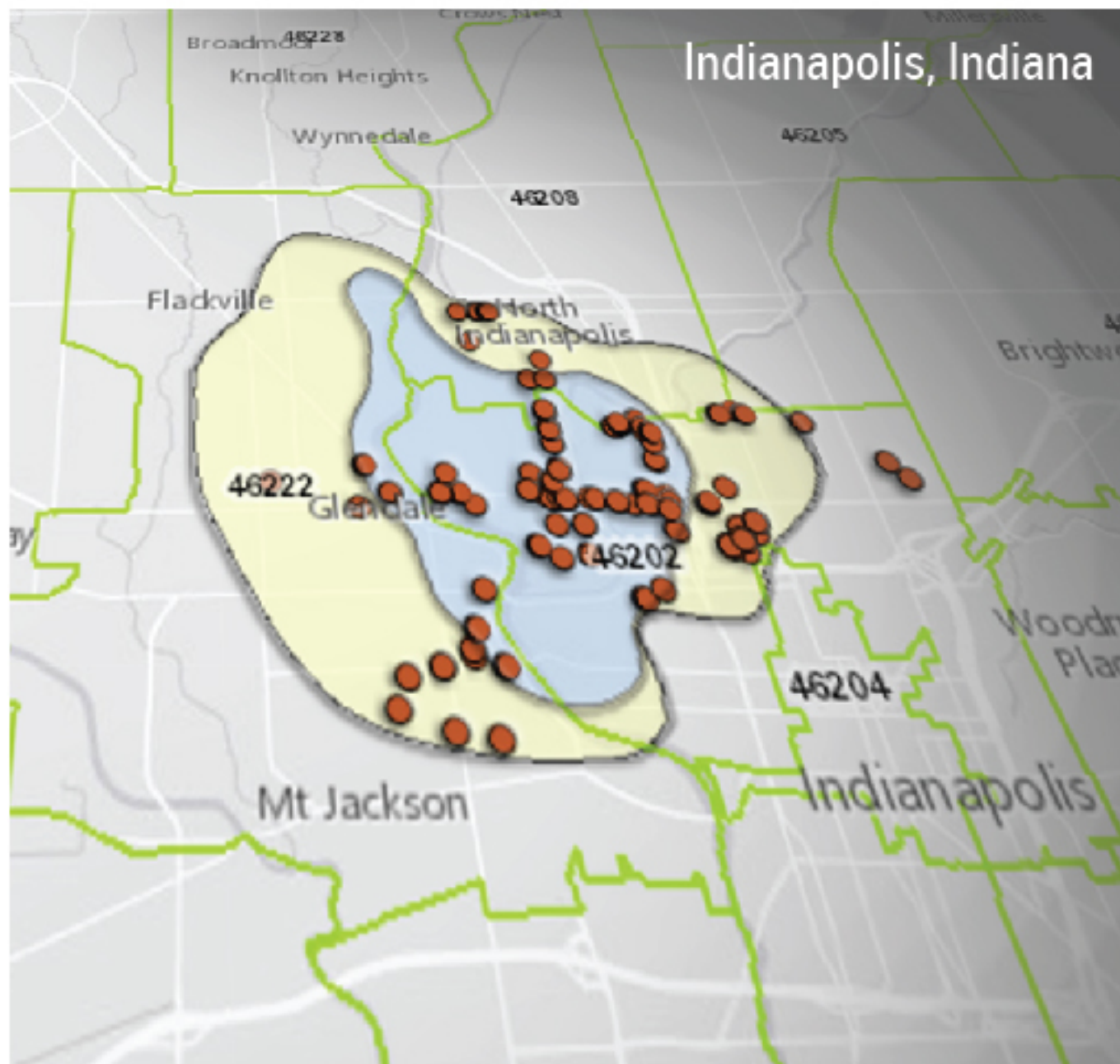




Annual Report to U.S. EPA on Site 0153

"... protecting Indy's underground drinking water ..."



June 2020

Table of Contents

SITE OVERVIEW	2
IDEM's ACTIVITIES SINCE TAKING THE LEAD	3
COMMUNITY CONCERNS	3
Ensuring Safe Drinking Water	
Limiting the Loss of Brownfield Funding and Preserving Development Opportunities	
Reconciling Historic Contamination with Development	
The Resulting Community Involvement Plan	
THE INVESTIGATION AND CLEANUP	6
THE TECHNICAL ASSISTANCE GRANT	7
OTHER U.S. EPA CONCERNS BEING MET	8
FUNDING	8
COMMUNITY RESOURCES AND CONTACTS	8

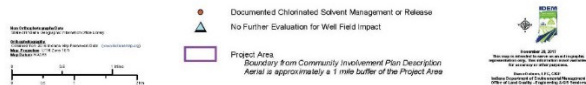
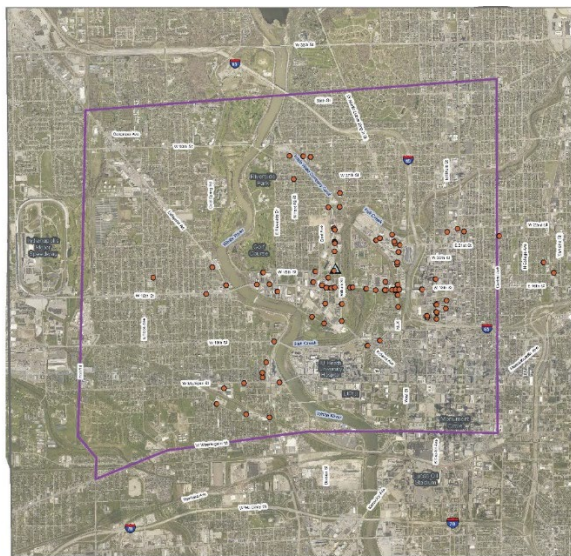


SITE OVERVIEW

Citizens Water operates the public drinking water supply for the city of Indianapolis. In 2013, Citizens Water notified 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) set by U.S. EPA under the Safe Drinking Water Act.

U.S. EPA designated the Riverside groundwater contamination as “Site 0153” and proposed it for inclusion on the National Priorities List (NPL). In response to public sentiment and updated information from Citizens Water, IDEM subsequently requested that U.S. EPA defer listing the site on the NPL. On June 8, 2017, U.S. 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 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 has identified 89 sites where VOCs 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

Since taking the lead on June 8, 2017, IDEM:

- Sent 13,400 initial letters and fact sheets (in English and Spanish) to residents and businesses located within the site.
- Issued notice of liability letters for 20 sites and over 140 information request letters.
- Has evaluated the majority of the initial 89 sites and completed investigations of four sites.
- Completed the "Community Involvement Plan" in February 2018, and met with environmental groups regarding potential updates.
- Held several public information meetings in various neighborhoods within Site 0153.
- Solicited and awarded a Technical Assistance Grant to Indianapolis Environmental Equity Council, Inc., a nonprofit organization composed of several neighborhood organizations.
- Held bimonthly stakeholder consultations with the city of Indianapolis, Citizens Water, 16 Tech, and the Marion County Public Health Department to coordinate complete responses to public concerns.
- Updated the interactive map on the project website at www.idem.IN.gov/Site0153 with the most recent information regarding ongoing investigations and site-specific cleanups.
- Established a public document repository on the 12th Floor of Indiana Government Center North, 100 North Senate Avenue, Indianapolis.

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 drinking water for contaminants. Citizens Water has committed to taking any production well where raw water exceeds an MCL out of service and only return it to service once raw water becomes, or is treated to, below Safe Drinking Water Act MCLs (drinking water standards) established by U.S. EPA to ensure that the drinking water 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 Indiana Central Canal in Indianapolis and then treats and filters all of the water before sending it to customers. Citizens Water routinely tests the finished water for over 300 constituents, including chlorinated solvents. Citizens Water has tested 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 finished water; (2) all levels in the raw water from active production wells

remain below the MCLs even before treatment; and (3) ongoing 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 Drinking Water Information System website at myweb.IN.gov/IDEM/DWW/index.jsp (search Water System No. "5249004"). Though not required by law, Citizens Water decided in 2016 to shut down one of its 19 production wells based on raw, underground water monitoring results. In accordance with the 2016 alternative plan (see Exhibit B in the Memorandum of Agreement located under "December 2017 Update" at www.idem.IN.gov/cleanups/pages/site0153/), Citizens Water plans to install aeration equipment for this well in 2020 to reduce chlorinated volatile organic compounds (CVOCs) concentrations in the raw water to below the MCL and return the well to service.

In February and March 2018, IDEM participated in split sampling from the production wells then in use in addition to sampling of the finished water served to customers. During the February and March 2018 sampling events, any trace amounts of chlorinated solvents found in the raw water pumped from the aquifer were below the Maximum Contaminant Levels allowed under the Safe Drinking Water Act. No chlorinated solvents were found in the finished water being served to Citizens Water customers. Results of the two sampling events are in the Virtual File Cabinet at <https://vfc.idem.in.gov/DocumentSearch.aspx> under document numbers 80640260 and 80644102, respectively.

Seven private wells have been identified in the Site 0153 investigation area. The Marion County Public Health Department has investigated some of these wells and will continue to address private well contamination issues and conduct sampling where needed.

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 confirm the limited boundaries within which brownfield funding is no longer available within Site 0153 and preserve this funding for elsewhere on the site.

To date, brownfields funding has not been denied to an eligible site due to its location within the one-year time of travel boundary for Site 0153.

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. For example, the 16 Tech Innovation District (“16 Tech”) is a 50 acre mixed-use development project under construction along Indiana Avenue between 10th Street and 16th Street. Where it has acquired property, 16 Tech has shared its Phase I environmental investigations with IDEM. 16 Tech’s reports confirm that there are no source areas of concern on the 16 Tech properties. Likewise, other entities that have acquired properties within Site 0153 have shared their environmental investigations with IDEM, all of which have been posted for public view on IDEM’s the Virtual File Cabinet.

To facilitate area developments, since 2017 a number of drinking water wells that had been part of the Riverside Wellfield have been taken out of service and abandoned. To make up for lost capacity, Citizens Water may need to install additional wells in the future to continue to meet the needs of the community. These recent changes to the Riverside Wellfield have created and will continue to create ongoing changes in the dynamics of the wellfields. Citizens Water continues to follow the “Alternative Plan” for managing these wellfields, as described in its September 1, 2016 comments on US EPA’s proposed site 0153 Rule, and to continue to produce raw water that complies with the limits set by the Safe Drinking Water Act for finished water.

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 the CIP 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, 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

Although finalized in early 2018, IDEM has since met with local groups to consider further improvements to both the CIP and IDEM's communication with the public in general.

THE INVESTIGATION AND CLEANUP

In June 2017, IDEM began Phase I of the Remedial Investigation, which focuses on systematically investigating the initial 89 sites identified as potential sources of chlorinated solvents. To date, 77 of the 89 properties have either identified or addressed the contamination on their property (or some portion of that contamination) in Voluntary Remediation Agreements, Brownfield Comfort Letters, or by working with IDEM's State Cleanup Section. Since taking the lead in June 2017, IDEM has sent over 140 requests for information and issued notice of liability letters to 20 sites. This investigation is ongoing. As warranted, additional investigations have been added to the initial list.

In addition, several other sites have been addressed in IDEM's Underground Storage Tank Section where the contaminant of concern is typically petroleum, not chlorinated solvents. Unless there has been an unaddressed release of chlorinated solvents, these UST sites are not being further investigated as part of the Site 0153 investigation. However, the data from these sites provides further information about the geology and hydrology at those locations within Site 0153.

As of 2020, IDEM has collected enough information to begin preparing a conceptual site model of a proposed Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) protective cleanup. IDEM continues to meet the terms of the Memorandum of Agreement with U.S. EPA and is simultaneously working to complete the Remedial Investigation, Human Health and Ecological Risk Assessment, and Feasibility Study, with completion targeted for August 2020. The following table summarizes IDEM's activities regarding the tasks listed in the Memorandum of Agreement:

	Tasks Undertaken	Status
1	Community Involvement Plan	Public Notice 12/17; Finalized 2/18
2	Begin Phase I Remedial Investigation	Began investigation in June 2017
3	Prepare Removal Work Plan as necessary	Based upon investigation to date, no immediate removals are warranted.
Tasks in Progress		
4	Complete additional Remedial Investigation as necessary	Target Completion August 2020
5	Complete Human Health and Ecological Risk Assessment	Target Completion August 2020
6	Complete Feasibility Study	Target Completion August 2020
Remaining Tasks		
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

THE 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) for a coalition of several neighborhood organizations and churches, resulting in the nonprofit organization now known as the Indianapolis Environmental Equity Council, Inc. (IEEC). Implementation of the TAG is expected to begin with the 2020 fiscal year, beginning July 1, 2020, and continuing over a period of four years. The TAG will be implemented upon the initiative and instructions of IEEC. The grant process begins with IEEC identifying precisely what work is of interest to the local community. Details about the TAG process can be found in the Notice of Opportunity for Technical Assistance Grant for 0153 Ground Water Contamination Site under “August 2017 Update” on the Site 0153 website at: www.idem.IN.gov/cleanups/pages/site0153.

OTHER U.S. EPA CONCERNS BEING MET

In 2017, IDEM provided notice to the state Natural Resource Trustees, who work in close coordination with their federal counterparts. IDEM has committed to keeping the state 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 state trustees have not asserted claims at Site 0153.

FUNDING

IDEM is funding the investigation of Site 0153 with state funds. No Superfund trust money is being used. As of the end of 2019, IDEM has sufficient funds remaining to continue the Site 0153 investigation through 2020.

COMMUNITY RESOURCES AND CONTACTS

Information Repositories

IDEM maintains a website and interactive map for Site 0153 at www.idem.IN.gov/Site0153. In addition, copies of 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

A second document repository was created at the Flanner House Library at 2424 Dr. Martin Luther King, Jr. Street. The Flanner House library branch was closed in 2018. Upon request, IDEM will consider re-establishing a second document repository, as needed.

Stakeholders Include:

Indiana Department of
Environmental Management

Ryan Groves

Senior Environmental Manager
State Cleanup Program
(800) 451-6027
site0153@idem.IN.gov

City of Indianapolis

Piers Kirby

Brownfields Program Manager
(317) 327-5131
Piers.Kirby@Indy.gov

Citizens Water

Dan Moran

Director of Water Quality,
System Control and Planning
(317) 941-7155
DMoran@citizensenergygroup.com

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

16 Tech Community Corp.

Emily Krueger

Chief Operating Officer
(317) 238-2486
ekrueger@16tech.com