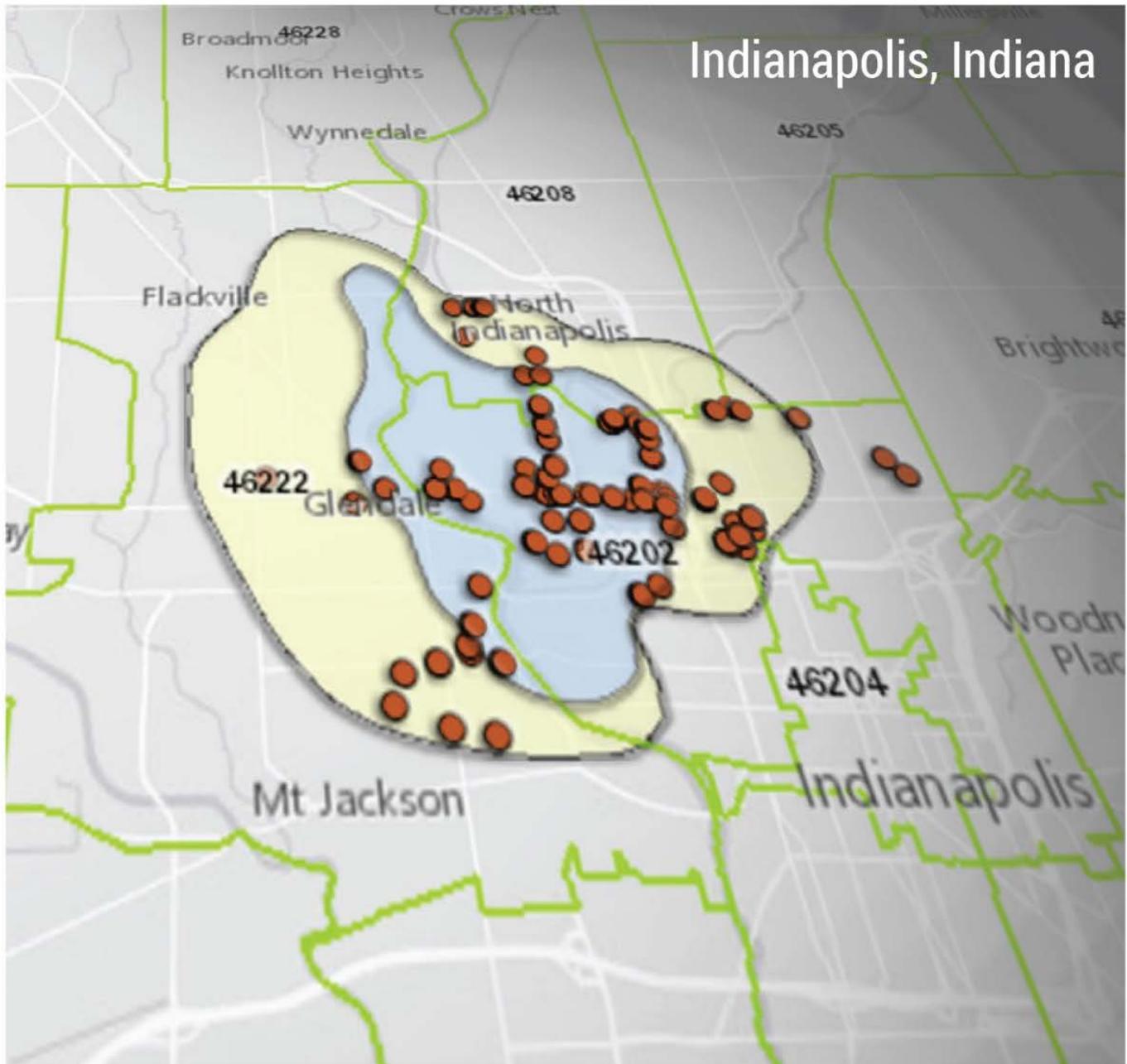




Annual Report to U.S. EPA on Site 0153 “... protecting Indy’s underground drinking water ...”



January 2018

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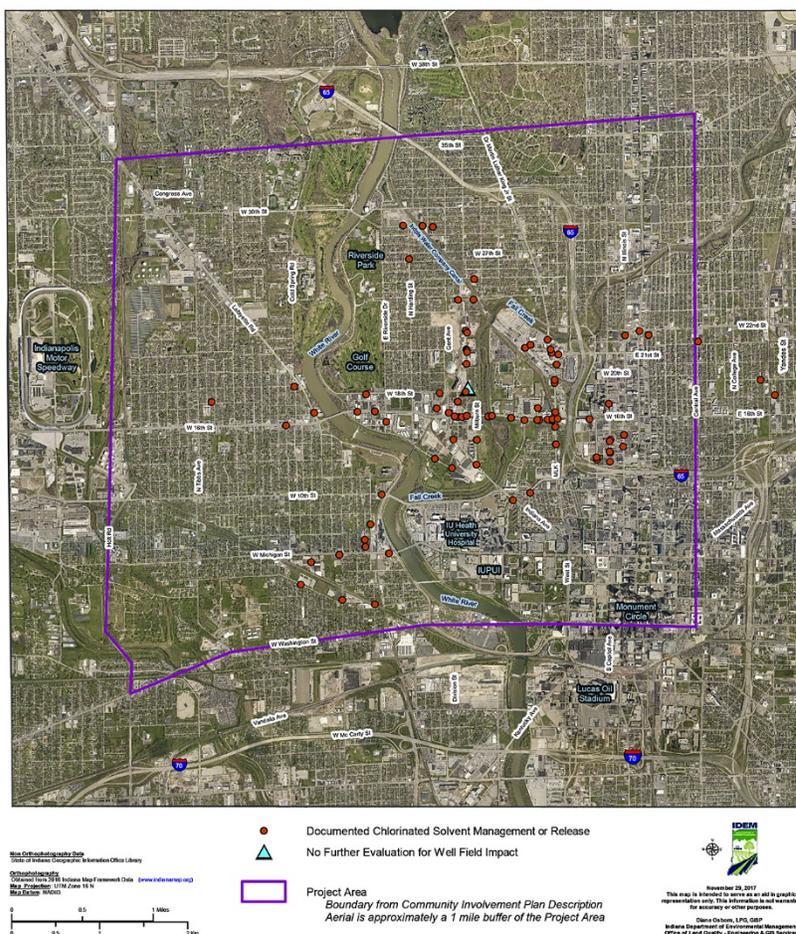


SITE OVERVIEW

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) set by the United States Environmental Protection Agency (U.S. EPA) under the Safe Drinking Water Act (SDWA).

U.S. EPA designated the Riverside groundwater contamination as “Site 0153” and proposed it for inclusion on the National Priorities List. In response to public sentiment and updated information from Citizens Water, IDEM subsequently requested that U.S. EPA defer the site. 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 then 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 has:

- Created a project website with an interactive map. The project website can be viewed at 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.
- Held two public information meetings in 2017 (Aug. 17 & Nov. 15) and will hold quarterly meetings in the future.
- Held several 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 being formed by several neighborhood organizations.
- Established a public document repository at the Indianapolis Public Library's Flanner House Branch.
- Prepared a draft "Community Involvement Plan," which is currently on public notice until January 31, 2018.
- Issued several notice letters and information requests to suspected source sites.

Thirty-one of the 89 sites are already being addressed (to some extent) in one of IDEM's remediation programs.

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 contaminant levels. 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

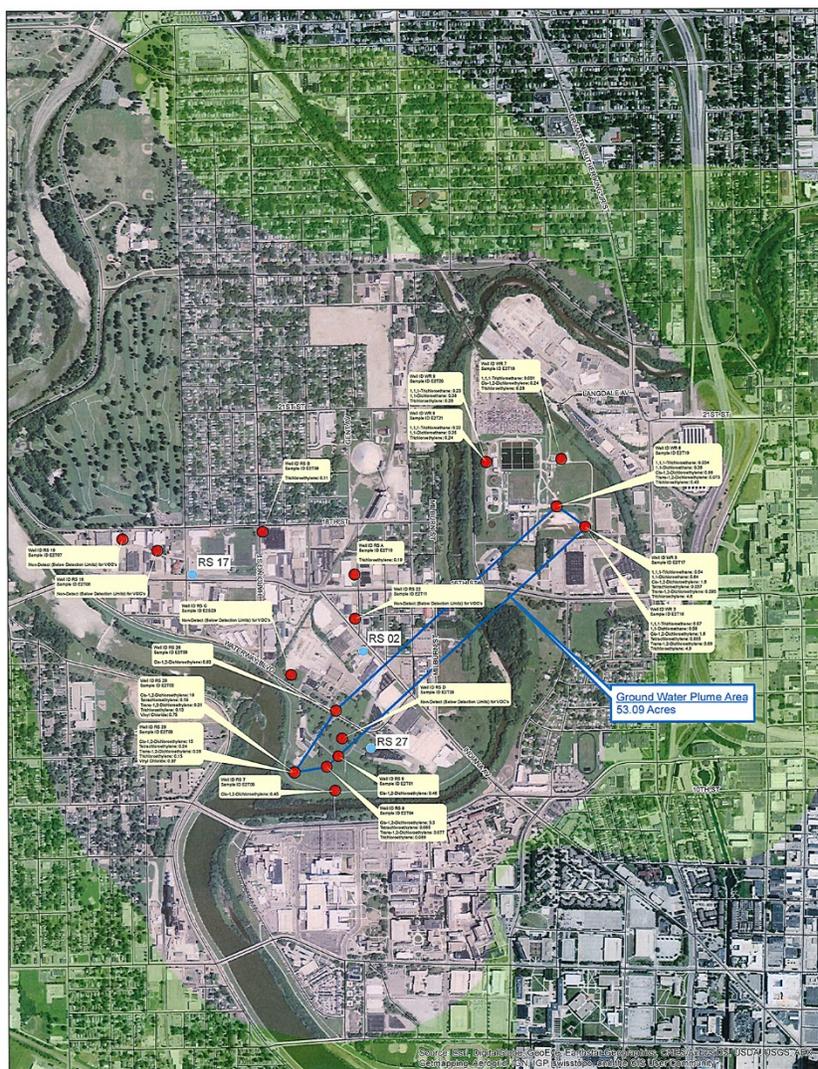
Water routinely tests the finished water for over 300 constituents, including chlorinated solvents. Citizens Water has and will continue to test the water of homes receiving municipal water upon request and at no cost to the property owner. To date:

- 1) No chlorinated solvents have ever been detected in the finished water above an MCL.
- 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.

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.

Riverside Ground Water Plume Boundary Map



This map is intended to serve as an aid in graphic representation only. This information is not warranted for accuracy or other purposes.

Mappped By: Shana Moore, Office of Land Quality Date: 06/05/2015

Sources: Non Contaminated Property Data - Obtained from the State of Indiana Geographical Information Office Library
 Document: Sampling Locations Results Reference 4, Tables 3-6, pgs 962, 965, 968
 Sampling Locations Reference 107
 Well Head Protection Area Reference 60
 Plume created based on results in Reference 4, page 116
 Data Accessibility: Obtained from Indiana Map Framework Data (www.indianamap.com)
 Map Projections: UTM Zone 18 N Map Datum: NAD83

Legend:
 ● Municipal Wells Not Sampled
 ● 2014 Sampling Results (µg/L)
 — Approximate Ground Water Plume Boundary
 — Wellhead 1 Year Delineation
 — Wellhead 5 Year Delineation

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 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 the opportunities that will be created by a major development known as 16 Tech. 16 Tech is a \$360 million plan for redevelopment of 60 acres of land within the Site 0153 project boundary into 100,000 square feet of research and office space dedicated to developing science as a means to advance health outcomes as quickly as possible. Additional information can be found at www.16tech.com.

IDEM's investigation of Site 0153 will occur around and, to the greatest extent possible, 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. 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

IDEM is accepting public comments on the Community Involvement Plan through January 31, 2018.

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. To date, 31 of the 89 properties have identified or addressed 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. IDEM is reevaluating work on these 31 properties, and therefore is not listing the projects at this time in this report. In addition, since taking the lead in June 2017, IDEM has sent 22 requests for information and six special notice of liability letters. The sites receiving notice of liability letters for chlorinated solvent related releases includes:

- Component Machine, Inc. – 1631 Gent Avenue
- Excelsior Laundry and Cleaners – 2179 N. Illinois Street
- Flexdar – 1825 W. 18th Street
- Goodwill Industries – 1635 W. Michigan Street
- Karstadt-Reed Dry Cleaners – 1449 N. Illinois Street
- Industrial Heat Treating/Bodycote Thermal – 2131 Dr. MLK Jr. Street

In addition, several 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; Final 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.
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) 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 the TAG process can be found on the project [website](#) and at the following link: www.IN.gov/idem/cleanups/pages/site0153/files/0153_tag_notice.pdf.

OTHER U.S. EPA CONCERNS BEING MET

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 state of Indiana Trustees do not foresee asserting claims at Site 0153.

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

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

Documents can also be viewed at:

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

Stakeholders Include:

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