



Soil Management for Developers Working in the American Lead EAA

Office of Land Quality

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idem.IN.gov

100 N. Senate Ave., Indianapolis, IN 46204

Introduction:

The former American Lead Facility, located at 2102 Hillside Avenue in Indianapolis, was used for industrial purposes dating back to at least the late 1800s. National Lead Industries (NL Industries) conducted secondary lead smelting at the property from 1946 to 1965. Historic operations at the smelter emitted fine particles of lead which landed in yards and contaminated the surface soil of the surrounding community. The use of fill material containing lead, deposits from leaded gasoline exhaust, and other industrial activities in the area, also caused some residential yards to be contaminated with lead.

Background:

In response, the Indiana Department of Environmental Management (IDEM) and the U.S. Environmental Protection Agency (U.S. EPA) tested soil from homes in the neighborhood. Lead impacted soil was removed from several hundred properties. A final round of testing was conducted in 2023 to determine if additional remediation was required, and those impacted soils were removed in 2025.

Properties within the Environmental Advisory Area (EAA) fall into one of four categories:

1. **Not tested:** Status unknown. Soil at the property was not sampled because the property was vacant; the property owner did not grant access or permission to test the soil, or the property was outside the investigation boundary.
2. **Tested and safe:** Lead concentrations measured below the cleanup threshold, so no soil replacement was necessary.
3. **Tested and remediated:** The soil from the property was sampled and lead impacted soil was removed completely and replaced with clean soil.
4. **Tested and partially cleaned up:** The soil from the property was sampled and contaminated soil was removed to a limited depth. Lead impacted soil was removed to a depth of about 1 foot of soil in common yard areas and up to 2 feet of soil in gardens or play areas. After excavation, an **orange construction fence** was placed flat on top of remaining soil to indicate where lead contamination begins. Clean soil was placed on top of the orange fence at either 1 foot or 2 feet as indicated above.

As of December 2025, the American Lead project is closed; no additional remedial action will be conducted. Property owners can request lead sampling for properties within the Environmental Advisory Area by contacting IDEM at 317-234-8622 or the Marion County Public Health Department at 317-221-2155.

What the Orange Construction Fence Means

The orange fence is a **warning sign**. It shows where the clean soil ends and the lead impacted soil begins.

- Soil **above the fence** is clean and safe.
- Soil **below the fence** still contains lead.

If you **dig below the fence**, you will expose lead impacted soil. Any disruption of this lead impacted soil will need to be properly managed for compliance, to avoid liability, and ensure safe environmental conditions for future residents.

Why is lead a problem?

Lead does not break down in the environment and no level of exposure is considered safe. Children under 6 years old and pregnant women are at the highest risk for lead exposure. Children who are exposed to lead may grow more slowly and have more trouble learning than other children. They may suffer damage to their brains, nerves, hearing, or speech. Lead toxicity can also damage an unborn child's brain, kidneys, and nervous system. Find more information at epa.gov/lead

How to Handle Lead Impacted Soil

- Determine the status of the property that you are developing. Due to privacy concerns, IDEM will only share property specific data with the property Owner of record.
 - Before you begin any excavation activities, contact IDEM at 317-234-8622 or americanlead@idem.in.gov to determine your property status. A letter will be mailed to the property owner of record, detailing the property's status. If your property status is unknown, or if your property was partially cleaned up, you are strongly advised to hire an environmental consultant. A consultant will help ensure your compliance with environmental law, thereby ensuring safe redevelopment for future homeowners.
- If the property has a partial cleanup, keep the clean soil (above the orange construction fence) separate from the lead impacted soil (below the orange construction fence). If you dig below the fence, you will expose lead impacted soil. Any disruption of this lead impacted soil will need to be properly managed for compliance, to avoid liability and ensure safe environmental conditions.
- Make sure samples are collected and analyzed for disposal using Toxicity Characteristic Leaching Potential (TCLP). Proper management of all excavated soil is required to avoid improper waste management enforcement (legal) actions due to violations of 329 IAC 3.1 or 329 IAC 10.
- Soil from below the fence should **not** be placed directly on the ground.
 - Put lead impacted soil in a covered container
 - You can either:
 - Put it back in the hole and cover it with at least 1 foot of clean soil, or
 - Dispose of it properly at either a Subtitle C or Subtitle D landfill depending on your TCLP analysis results.
- If you encounter an orange construction fence, be sure that the fence is replaced
- Confirmation sampling using an X-Ray Fluorescence (XRF) field instrument is acceptable.

For More Information

- **IDEM's Lead in Soil Fact Sheet:** idem.IN.gov/files/factsheet_olq_remediation_lead_soils.pdf
- **IDEM Soil Management Plan** (Institutional Controls Soil Management Plan for Restricted Soils Soil Management Plan) idem.IN.gov/files/nrpd_waste-0075.pdf
- **IDEM Uncontaminated Soil Policy** idem.IN.gov/files/nrpd_waste-0064-r1.pdf
- **IDEM Contained-in Determination Criteria for Live Loading** idem.IN.gov/cleanups/files/tech_guidance_soil_criteria.pdf
- **IDEM: Managing Waste: About Waste and How We Manage It** idem.IN.gov/waste/about-waste-and-how-we-manage-it