



IDEM Plans Remediation Closure Guide Updates

A Note from the Branch Chief

Welcome to the first newsletter of the Remediation Services Branch in IDEM's Office of Land Quality! In these unprecedented times of the COVID-19 pandemic it is important that we make an extra effort to communicate with you, our remediation stakeholders. As many of you already know, our project managers are teleworking from home and we are all learning a new way of doing things. However, remediation continues and our staff are as active and focused as ever in working with you to protect human health and the environment. Our newsletter will keep you up to date on key policy developments and technical issues on a semiannual basis. We will also keep you informed of staff and organization changes that may impact your site. Please feel free to suggest topics and [provide feedback](#). Let's all hope we can soon rejoin our fellow community members in a safe "new normal" as we continue to perform our important work and stay healthy!

Bruce Oertel, Remediation Services Branch Chief

Since 2012, IDEM's Remediation Closure Guide (RCG) has been providing consistent guidance on the environmental investigation, cleanup, and closure of contaminated sites in Indiana. In 2018, staff in the Remediation Services Branch decided that updates to the RCG were necessary because much has changed since the guide was first published. Michael Habeck, a longtime staffer in IDEM's Office of Land Quality, is in charge of the update. He said the biggest changes to RCG—in addition to a new name—will be key concepts, transition periods, and reorganized content.

Proposed modifications to the RCG include:

- (a) **Require routine soil gas screening, especially at chlorinated solvent releases**
- (b) **Routinely sample vapor conduits like sewers**
- (c) **Drop migration to groundwater screening levels**
- (d) **Drop vapor intrusion groundwater screening levels**
- (e) **Stop publishing residential and commercial soil direct contact levels for volatile chemicals**
- (f) **Stop using transition periods with each new table published**

Habeck said staff decided to eliminate transition periods between the screening table updates because the updates are rarely relevant—the chemicals involved do not usually drive remedy decisions. However, when the updates are significant, it is because the U.S. Environmental Protection Agency has determined that a chemical is more toxic than previously thought. Such circumstances fall into the "information not previously known to the IDEM commissioner" category, and staff believe it would be irresponsible for the agency to ignore new information that suggests a significant threat to human health or the environment.

In addition, the updated RCG—renamed Risk-Based Closure Guide—will be reorganized into a set of nine "tasks," either explicit or implied, as required by statute. For each task, the guide will explain what the task is and why it is required, provide examples (in some cases) of how to perform the task, and explain the criteria that IDEM will use to judge the sufficiency of tasks completed.

Habeck stressed that IDEM does not have a firm date for when the Risk-Based Closure Guide will become effective. On March 3, 2020, IDEM released the preliminary draft document to representatives from Indiana's environmental consulting community, contractors, attorneys, and other interested parties. The agency extended the comment period to June 15, 2020. Habeck said, "We'll take the feedback and use it to revise the document. We may produce written responses to comments received, convene workgroups, hold meetings, or take other steps to facilitate that process. What we decide to do will depend on the amount, type, and energy of comments received, and the willingness of others to help."

If past experience is a guide, reaching final status for the Risk-Based Closure Guide could take a long time. Once the guide is completed, IDEM will post it on the agency's [Technical Guidance for Cleanups](#) page and notify interested parties. For more information, please contact Michael Habeck at mhabeck@idem.IN.gov or (317) 234-4791.

State Cleanup Program Cross-Section

The COVID-19 pandemic has challenged the State Cleanup Program (SCP) as well as the consulting community. All SCP staff have been working remotely, with limited and necessary field visits. Remote telework has opened new considerations for our electronic document submittal procedures, and our project managers have been directly welcoming electronic files from the consultants. Please work directly with your project manager on the best method for electronic document submittal. SCP currently has 720 active sites, which includes 246 Independent Closure Program (ICP) sites. IDEM will soon propose moving the ICP from State Cleanup into the Petroleum Branch. A Nonrule Policy on the management of the ICP will be presented at the next available Environmental Rules Board meeting. Stay tuned! Our gatekeeper for incoming sites, Joshua Keller, has noticed an inconsistency in release reporting. While most consultants

appropriately call IDEM's 24-Hour Emergency Spill Line at (888) 233-7745 to report releases, some inappropriately call project managers directly. In addition, sometimes project managers directly receive an investigation/assessment/Phase II report as a release report. SCP requests that all releases be reported to IDEM's 24-Hour Emergency Spill Line. In other news, an interactive map for our [Franklin Investigation Site](#) is available. Please direct any questions about this site to Franklin@idem.IN.gov. The SCP direct contacts for this site are Tim Johnson and Haley Faulds. We also want to share that within the past few months, SCP welcomed two new project managers, Matthew Bly and Clare Parker. Joshua Keller has been promoted to senior environmental manager.

DID YOU KNOW?

Five Tips for Sites Transitioning to the Voluntary Remediation Program

The Voluntary Remediation Program (VRP) encourages environmental cleanups; facilitates the redevelopment, sale, and reuse of commercial and industrial properties; and reduces the risks that contaminants pose to human health and the environment. Owners with many different types of sites apply to the VRP. Some applicants have sites with no previous regulatory oversight, while others have sites that are transitioning from a different IDEM remediation program such as the State Cleanup Program or Leaking Underground Storage Tank Program. Below are five tips for owners who will be applying to the VRP:

1. If the site is being addressed through another IDEM program, tell the project manager that you are applying to the VRP. Keep them updated throughout the transition process and inform them once the Voluntary Remediation Agreement (VRA) is signed.
2. Initially, VRP project managers must limit the amount of work done on a site because cost recovery is not established until the VRA is signed. Meetings and site visits should wait until this milestone is achieved.
3. Always take the time to read through the VRA as it is updated periodically to reflect program changes. The Scope of Work (Exhibit A) and Schedule for Project Tasks (Exhibit B) in the VRA detail the expected project tasks and the anticipated timeline for completing each task. While the scope of work and timeline will vary due to site-specific conditions, the general expectations apply to all sites.
4. Once the VRA is signed, applicants must submit a Voluntary Remediation Investigation Plan (VRIP) within 60

HELLOS and GOODBYES

Marsha Lay has been selected to fill the position of now-retired vapor intrusion and risk analysis specialist, Michael Anderson. Marsha holds a B.S. in Geological Sciences from The University of North Carolina at Chapel Hill and an M.S. in Geological Sciences from Ball State University. To reach Marsha, please call (317) 234-3929 or email MLay@idem.IN.gov.

days. This report should summarize what work has been completed at the site to date and include plans for immediate next steps. The report may be required even if the site has already been delineated under the oversight of a different IDEM program.

5. All document submittals must meet VRP statutory requirements. Minor modifications may be needed if documents have been previously submitted to another OLQ program.

Information for all IDEM remediation programs can be found in the Remediation Program Guide available on the [Technical Guidance for Cleanups](#) page. For more information on VRP, please refer to [IC 13-25-5](#) and the VRA (available on the [Resources](#) page).