



Citizens Gas | Citizens Thermal | Citizens Resources
2020 N. Meridian St. | Indianapolis, IN | 46202-1393
www.citizensenergygroup.com

LaTona S. Prentice
Vice President, Regulatory Affairs
Office: (317) 927-4529 | Cell: (317) 409-4033
lprentice@citizensenergygroup.com

September 28, 2021

Via U.S. Mail

Douglas Ballotti, Director
Superfund & Emergency Management Division
US Environmental Protection Agency, Region 5
77 W. Jackson Blvd., SR-6J
Chicago, IL 60604

**Re: Riverside Groundwater Contamination Site
U.S. EPA ID# INN000510936
National Priority List De-Proposal**

Dear Mr. Ballotti:

Citizens Water, a part of Citizens Energy Group (Citizens Water or Citizens), submits this letter in support of de-proposal of the Riverside Groundwater Contamination Site (U.S. EPA ID# INN000510936) (Site 0153 or Site) for inclusion on the United States Environmental Protection Agency (EPA) National Priorities List (NPL). Citizens Water is the public drinking water supply utility for the City of Indianapolis and owns, operates, and manages the Riverside and White River Municipal Wellfields (Wellfields) that are the focus of Site 0153.

Site 0153 is located in Indianapolis, Marion County, Indiana and consists of an area of marginally impacted groundwater in the vicinity of Citizens Water's Wellfields. In 2013, Citizens notified the Indiana Department of Environmental Management (IDEM) that low levels of chlorinated volatile organic compounds (cVOCs) had been detected in untreated "raw" groundwater samples collected from certain water production wells in the Wellfields. As part of its standard drinking water operations, Citizens mixes raw groundwater from the Wellfields with surface water from the Indianapolis Central Canal, which is then treated and filtered, creating the "finished water" distributed to the public. The finished drinking water provided to customers by Citizens has always met and continues to meet the "maximum contaminant levels" (MCLs) and other requirements established by EPA under the Safe Drinking Water Act.

In 2016, the EPA published a Proposed Rule in the Federal Register, proposing to include Site 0153 on the EPA NPL. 81 Fed. Reg. 20277 (April 7, 2016). Following publication of the proposed rule, IDEM, the City of Indianapolis, local citizens, Citizens, and others developed and proposed to EPA an "Alternative Plan" that would allow Site 0153 to be managed by IDEM under state law in lieu of listing the site on the NPL and managing it as a federal Superfund Site. In response to this proposal and other public comments on the proposed rule, EPA agreed with the Alternative Plan. In 2017, IDEM and EPA entered into a Memorandum of Agreement (MOA) that specified the work to be performed by IDEM to address conditions at Site 0153. The ultimate goal of the MOA was that once the work required by the MOA was completed, EPA would "de-propose" the Site for NPL listing.

IDEM has now completed the response actions for the Site as described in IDEM's Record of Decision (ROD) dated January 4, 2021 and published for public comment until February 18, 2021. These actions included installation of an aeration system on Citizens' production well WR-3, completed in January 2020, to remove low-level chlorinated solvents from the raw groundwater before it is mixed and treated for distribution. The response actions also include a robust plan to be implemented if an MCL is exceeded in raw groundwater at any production well in the future.

Currently, chlorinated solvent concentrations continue to decline in the raw water produced by Citizens' production wells. Results from testing raw water produced by Citizens production wells are, and have been for several years, below MCLs in every production well with the sole exception of WR-3. Results from testing the raw water produced by WR-3 (which continues to be treated) have generally been below MCLs since the aeration system was installed in January 2020. The plan approved by the ROD will ensure that all water from each production well in the wellfields will be below MCLs *before* that water is mixed with surface water and treated thus ensuring that the finished water supplied to the public will always be below all MCLs.

For all of these reasons, Citizens supports IDEM's proposal to have Site 0153 de-proposed from inclusion on the NPL. If you have any questions or comments concerning this matter, please do not hesitate to contact Joe Sutherland with Citizens Energy Group (JSutherland@citizensenergygroup.com).

Sincerely,



LaTona S. Prentice
Vice President, Regulatory & External Affairs
Citizens Energy Group

cc: Bruno Pigott, Commissioner, IDEM
Ryan Groves, Senior Environmental Manager, State Cleanup Program, IDEM