

January 2022

Final Report to EPA for

Site 0153

“...protecting Indy’s underground drinking water . . .”

Indianapolis, Indiana



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM has delivered a timely CERCLA protective cleanup, as specified under the Memorandum of Agreement between IDEM and EPA, and offers this Final Report to EPA for Site 0153.

Table of Contents

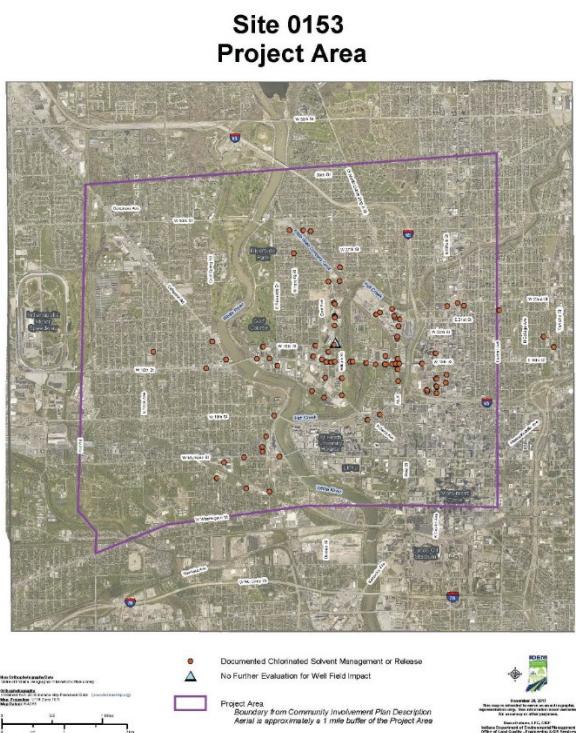
SITE OVERVIEW	3
IDEM's ACTIVITIES SINCE 2017	4
MEETING COMMUNITY CONCERNS	4
Ensuring Safe Drinking Water	5
Confirming No Vapor Intrusion Risk in Residential Areas	5
Preserving Brownfield Funding for Development Opportunities	6
Reconciling Historic Contamination with Development	6
COMPLETING THE INVESTIGATIONS AND CLEANUPS.....	6
ADVISING THE NATURAL RESOURCE TRUSTEES	7
CONTINUED STATE FUNDING	8
COMPLETING THE MEMORANDUM OF AGREEMENT.....	8
COMMUNITY RESOURCES AND CONTACTS	9



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 were below the Maximum Contaminant Levels set by EPA under the Safe Drinking Water Act.

EPA designated the Riverside groundwater contamination as “Site 0153” and proposed it for inclusion on the National Priorities List (Superfund). In response to public sentiment and updated information from Citizens Water, IDEM subsequently requested that EPA defer the site. On June 8, 2017, 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 is now overseeing the remedial activities at individual sites within Site 0153.



In general, 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 initially 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 2017

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 Site 0153.
- Issued 25 Notice of Liability letters and over 140 Information Request letters.
- Completed the “Community Involvement Plan” in February 2018 and routinely met with environmental groups regarding potential updates.
- Held numerous public information meetings in various neighborhoods within Site 0153.
- Solicited and awarded a Technical Assistance Grant to Indianapolis Environmental Equity Council, Inc., a nonprofit comprised of several neighborhood organizations.
- Held bi-monthly stakeholder coordination meetings with the city of Indianapolis, Citizens Water, 16 Tech and the Marion County Public Health Department to ensure complete and accurate responses to public concerns.
- Maintained an interactive map on the project website at www.idem.IN.gov/Site0153, posting current information on 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, 46204.
- Completed evaluations of the initial 89 sites and several other sites found thereafter.
- In January 2021, after favorable public comment, IDEM finalized the Remedial Investigation, Human Health and Ecological Risk Assessment, and Feasibility Study.
- In March 2021, sixteen individual site owners entered into an Agreed Order with IDEM to fund a Monitoring and Future Response Fund (MAFR Fund) in the amount of \$425,000, dedicated to monitoring the underground drinking water and performing any cleanups if they become necessary.
- On September 28, 2021,
 - IDEM signed the Record of Decision for the selected remedy, which required installing a remediation system on one well, with contingency plans in the event of contaminant spikes in any other wells, and
 - IDEM requested that EPA de-propose Site 0153 from the National Priorities List, with letters of support from the city of Indianapolis, Marion County Public Health Department, Citizens Energy Group, and the Indianapolis Environmental Equity Council, Inc.
- On October 1, 2021, IDEM issued a Remedial Action Report in which the agency certified that the Site 0153 remedy was successfully completed, and the intended cleanup levels achieved.

MEETING COMMUNITY CONCERNS

Throughout this investigation, community members have shared the following concerns with IDEM, which have since been successfully addressed.

Ensuring Safe Drinking Water

IDEV and Citizens Water continue to monitor the drinking water for contaminant levels to ensure that the drinking water remains safe for consumption. If any chlorinated solvent in the raw water exceeds a Maximum Contaminant Level, Citizens Water has committed to taking that production well out of service and only returning it to service once raw water becomes, or is treated to, below Safe Drinking Water Act Maximum Contaminant Levels established by EPA. For example, Citizens Water engineered and installed an aeration remediation system on production well WR-3 and, following aeration testing on the production well, brought WR-3 back into service in April 2020. The raw water meets the Safe Drinking Water Act standards set by EPA.

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 water before sending it to customers. 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.

There has never been a detection of any chlorinated solvent in treated (“finished”) water produced by Citizens Water and provided to customers. The finished water produced by Citizens Water has met, and continues to meet, all applicable Maximum Contaminant Levels and other requirements of the Safe Drinking Water Act. Other than well WR-3, chlorinated solvent concentrations in the raw groundwater within the wellfields are all below the applicable EPA Maximum Contaminant Levels and have been for the last five years.

Seven private wells have been identified in the Site 0153 investigation area. With the cooperation of willing owners, the Marion County Public Health Department has investigated those wells and will continue to address private well contamination issues and conduct sampling where needed.

Confirming No Vapor Intrusion Risk in Residential Areas

In October 2017, IDEM announced it would fund a Technical Assistance Grant with a coalition of several neighborhood groups organized as the non-profit Indianapolis Environmental Equity Council, Inc. In April 2021, IDEM and the Indianapolis Environmental Equity Council completed a scope of work for hiring a technical consultant to review the

adequacy of IDEM's investigations and to confirm IDEM's assessment that there are no vapor intrusion risks in 27 designated residential areas within Site 0153.

On behalf of the Indianapolis Environmental Equity Council, the Indiana Brownfields Program solicited proposals from qualified environmental consultants to perform document review, vapor intrusion risk assessment, and community outreach. After competitive bidding, the Indianapolis Environmental Equity Council and IDEM selected BCA Environmental Consultants, LLC and Risk Options, LLC, as the qualified environmental consultants. A contract was signed on July 29, 2021, and the review of IDEM's work is now ongoing. The contract is fully funded, and IDEM expects completion of the TAG review in 2022. If any unacceptable risk is discovered, IDEM has the funding to promptly mitigate that risk.

Preserving Brownfield Funding for Development Opportunities

By law, EPA's brownfield funding is automatically withdrawn when a site is proposed for the National Priorities List. Residents and businesses wanted to know whether they are within the boundaries of the proposed listing of Site 0153.

In September 2017, IDEM sent a letter to EPA confirming that, for purposes of Superfund listing, Site 0153 is limited to a narrow band bounded by production wells where chlorinated solvents had been detected. Some of the wells defining Site 0153 have since been removed and relocated under the joint effort of Citizens Water and 16 Tech. To IDEM's knowledge, brownfields funding has not been denied to any eligible applicant due to its location within the one-year time of travel boundary for Site 0153.

Reconciling Historic Contamination with Development

IDEV 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.

Six of Citizens Water's drinking water wells were located within a development known as the "16 Tech Innovation District", a 50-acre mixed-use development project along Indiana Avenue between 10th Street and 16th Street. To facilitate development, in 2019, Citizens Water and 16 Tech relocated six drinking water wells to new locations both cross gradient and away from the sites of historic industrial activity. The relocation of these six wells greatly reduced the threat posed by the legacy of chlorinated solvents from former industrial sites in the area.

COMPLETING THE INVESTIGATION AND CLEANUPS

In 2017, IDEM began an exhaustive search for Potentially Responsible Parties and potential chlorinated solvent sources within Site 0153. After years of thorough review, no specific chlorinated solvent source, or combination of sources, have been identified as the

definitive source of the impacts identified in certain production wells. Instead, low-level impacts have been caused by a number of individual, disparate sources that used and released chlorinated solvents long ago which contributed to a widely dispersed, low-level, co-mingled groundwater plume.

The Memorandum of Agreement executed on June 8, 2017, between IDEM and EPA identified a Schedule of Performance. With the work of the past five years, IDEM has completed all required tasks:

	Scheduled Task	Task Completed by IDEM
1	Complete Community Involvement Plan	February 2018
2	Begin Phase I Remedial Investigation	June 2017
3	Prepare Removal Work Plan as necessary	No immediate removals were necessary
4	Complete additional Remedial Investigation as necessary	January 2021
5	Complete Human Health and Ecological Risk Assessment	January 2021
6	Complete Feasibility Study	January 2021
7	Proposed Remedial Action Public Comment Period	February 2021
8	Record of Decision	September 28, 2021
9	Remedial Design	Remedial Action Report, October 2021
10	Implement Remedial Action	Remedial Action Report, October 2021, with contingent Remedy, if required

Though IDEM's work under the Memorandum of Agreement is complete, there are ongoing cleanups at individual sites. To prevent any future impacts to the wellfields, IDEM will continue to manage the cleanups at these individual sites within the 5-year time of groundwater travel to the wellfields through one of IDEM's state remediation programs such as the State Cleanup Program, Voluntary Remediation Program, and/or the Indiana Finance Authority's Brownfields Program. Individual responsible parties have been, and will continue to be, responsible for conducting their own site investigations and remediation under IDEM direction and oversight to address chlorinated solvent detections.

ADVISING THE NATURAL RESOURCE TRUSTEES

In 2017, IDEM provided notice to the state Natural Resource Trustees who work in close coordination with their federal counterpart. In 2021, IDEM also provided specific notice to the Trustees and others that IDEM would be requesting that EPA de-propose Site 0153 from the National Priorities List. In addition, information regarding any releases within Site 0153 is available on an ongoing basis through IDEM's public website.

CONTINUED STATE FUNDING

The investigation of Site 0153 and the Technical Assistance Grant have been funded with state funds. No Superfund trust money has been awarded or used. As of the end of 2021, IDEM had sufficient general fund money to continue any remaining Site 0153 investigations through 2022 and beyond.

In addition, IDEM completed a group settlement with sixteen Potentially Responsible Parties and placed \$425,000 in proceeds in a Monitoring and Future Response Fund. Over the next decade, IDEM will use the MAFR Fund to continue to monitor the quality of underground water within Site 0153 and perform any cleanups as necessary.

COMPLETING THE MEMORANDUM OF AGREEMENT

On October 1, 2021, IDEM issued a Remedial Action Report in which the agency certified that the Site 0153 remedy had been successfully completed and the intended cleanup levels achieved. EPA has not identified any data deficiencies in the Remedial Action Report. Section VI of the Memorandum of Agreement entitled “Completion of the State Response Action” states:

“. . . if the response at the Site is confirmed as complete, the Site will not be further evaluated for NPL listing, unless EPA receives information of a release or potential release at the site which poses a significant threat to human health or the environment. Upon completion of response actions and confirmation by EPA, the Site will be archived.”

IDEM will continue to manage the known releases at individual sites within Site 0153 through IDEM’s remediation programs. There are no other releases or potential releases within Site 0153 which pose a significant threat to human health or the environment that would warrant further involvement by EPA.

In October 2021, IDEM requested that EPA de-propose Site 0153 from the National Priorities List, with letters of support from the city of Indianapolis, Marion County Public Health Department, Citizens Energy Group, and the Indianapolis Environmental Equity Council. In December 2021, EPA Region 5 reported that it forwarded IDEM’s request to EPA Headquarters in Washington, DC.

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
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