



RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS

July 2025

**Former Three Rivers Gold Plating
1506 Wall Street, Fort Wayne, Indiana
Fort Wayne, Indiana
U.S. EPA ID. IND984876508**

I. INTRODUCTION

Under the Resource Conservation and Recovery Act (RCRA), all permitted and interim status hazardous waste treatment, storage, or disposal facilities are required to conduct corrective action for any release of hazardous waste or hazardous constituents at or from their facilities.

This Statement of Basis is issued by the Indiana Department of Environmental Management (IDEM), regarding the Former Three Rivers Gold Plating facility, 1506 Wall Street, Fort Wayne, Indiana, Indiana 46802. IDEM has determined that no further corrective action is necessary for any of the identified solid waste management units (SWMUs) or areas of concern (AOCs) at this facility.

IDEM is issuing this Statement of Basis as part of its public participation responsibilities under RCRA Corrective Action Program guidance, and is using the administrative procedures found in 40 CFR Part 270, as adopted by reference, to provide public notice and solicit comments. The public notice period is hereby announced and will continue for 30 days from the published date of the Public Notice in the Fort Wayne Journal Gazette.

This Statement of Basis summarizes information found in greater detail in the work plans, reports, or other documents in this facility's administrative record, which can be accessed via IDEM's Virtual File Cabinet (VFC). IDEM encourages the public to review these documents in order to gain a more comprehensive understanding of the facility and the activities that have been conducted under RCRA authority. IDEM may modify this corrective action determination or select another remedy based on public comments or new information obtained.

This determination completes the corrective action process under the RCRA Corrective Action Program for this facility. The facility must continue to comply with all applicable parts of RCRA.

II. FACILITY BACKGROUND

Three Rivers Gold Plating Co. was an electroplating company located at 1506 Wall Street Fort Wayne, Indiana. The company provided scientific and decorative copper, nickel, gold, platinum, and palladium precious metal plating services. The facility was operational from 1986 to 2010, when it was condemned by the Fort Wayne City Building Department in early May of that year. The facility was housed in a brick, 2 story building comprising roughly 12,000 square feet. The plating operation was on the first floor. The site is an approximately 0.34-acre developed property housing an approximately 22,000 square foot commercial building.

The site building comprises three sections, of which the west section of the site building contains two stories with 6,750 square feet area on each level. Historical review of records available for the site on the IDEM VFC (Agency Interest ID 43852) and aerial photographs available on the Allen County, Indiana iMap GIS Data Viewer3 show that drums, totes, and other various containers of plating-related fluids were stored at the east site boundary and on the north area adjacent to the site building.

The United States Environmental Protection Agency (US EPA) removed the containers during an emergency response action in 2010 – 2011, triggered by a May 2010 IDEM OLQ complaint. Photographs captured during subsequent iterative inspections completed by IDEM OLQ and aerial photographs of the site indicate an approximately 5 x 100-foot-long area along the east site boundary, and an approximately 5-foot wide by 50-foot-long area along the north side of the building were used for container storage for many years. IDEM OLQ requested assessment for impacts associated with historical container storage.

III. SITE ASSESSMENT

The facility submitted *Limited Phase II Subsurface Investigation* (VFC # 83463856) that assessed current conditions relative to subsurface vapors and shallow soil. It followed up with *Further Site Investigation* (VFC # 83570997) that revealed the only constituents found in shallow soil that exceeded IDEM's Risk-based Closure Guide's Published Levels (R2 PLs) were arsenic, which exceeded the residential PL in numerous locations, and lead, which exceeded the residential PL in several locations and exceeded of the excavation worker PL in one location.

IV. SUMMARY OF THE CORRECTIVE ACTION DETERMINATION

Based on the administrative record, IDEM is proposing no further action for the facility. IDEM recommends that a Corrective Action Complete with Controls determination be issued for the Former Three Rivers Gold Plating Facility. "With Controls" means that IDEM approved an institutional control in the form of an environmental restrictive covenant (VFC # 83807413), and engineering control in

the form of construction of an asphalt pavement barrier (with associated operation and maintenance plan (O&M plan)) over the isolated lead and arsenic affected area that exceeded construction worker and residential PLs, respectively (VFC # 83752948).

V. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination, particularly if you are aware of past spills and/or releases that have occurred at this facility. You may request IDEM hold a public hearing. At a public hearing, you would have the opportunity to submit oral or written comments. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing/meeting 30 days in advance.

The Public Notice and the administrative record are available for review on IDEM's Virtual File Cabinet. To view these documents, go to www.in.gov/idem/legal/public-records/virtual-file-cabinet/. VFC content numbers are provided in Section VI. for the primary documents IDEM used to support this decision.

Before taking final action, IDEM will give full consideration to all significant and relevant comments received. IDEM will summarize the comments and its responses to the comments, and announce its decision in a Final Decision/Response to Comments document. This document will be incorporated into the administrative record. To send written comments or obtain further information, contact:

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VI. REFERENCES

Limited Phase II Subsurface Investigation, VFC # 83463856
Further Site Investigation, VFC # 83570997
Closure Documentation Submittal, VFC # 83651489
Environmental Restrictive Covenant, VFC # 83807413
Asphalt Pavement Operation and Maintenance Plan Approval, VFC # 83752948