

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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September 19, 2017

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Ms. Tanaka and Mr. Dufficy:

RE: Confirming Boundaries

Groundwater Plume Boundary Map Site

0153

When the Environmental Protection Agency (EPA) first proposed listing Site 0153 on the National Priority List (NPL), community members were concerned over the stigma attached to being designated as part of a Superfund site. Consequently, the Indiana Department of Environmental Management (IDEM) offered to take over the assessment and cleanup activities, and the public also supported IDEM taking the lead at Site 0153. On June 8, 2017, EPA entered into a deferral agreement with IDEM, and IDEM became the lead agency for Site 0153.

Site 0153 presents the less-than-typical situation of a contaminant plume from an unknown source; a plume that possibly stretches under numerous homes and businesses in an urban area and flows toward drinking water wellfields. Residents and businesses want to know whether they are within the boundaries of the proposed listing of Site 0153 on the NPL.

Pursuant to Hazard Ranking System (HRS) protocols for an underground plume from an unknown source, the contours of the plume itself are the boundaries of the proposed site. The site boundaries are drawn by connecting the dots between points of known contamination that are sufficiently above background contamination and lab analysis limitations. The attached Groundwater Plume Boundary Map for Site 0153 was thus created as the basis for the proposed NPL listing.

The boundaries of Site 0153 were also determined with EPA during several phone calls in May of 2016. At that time EPA and IDEM agreed that the one year time-of-travel line was far too large of an area to serve as the appropriate boundary for Site 0153. IDEM suggested that the boundary should be smaller than as depicted on the attached boundary map, but EPA made it clear that the polygon outlined on the attached Groundwater Plume Boundary Map for Site 0153 properly depicted the boundary of Site 0153 for scoring and listing purposes and IDEM ultimately agreed.



Once in the lead, IDEM began implementing an area wide solution which involves the community well beyond the boundary. Significant area wide activity has occurred since the June 9, 2017 deferral agreement with EPA, including:

- Using billing addresses provided by the local water company, IDEM mailed a public information letter introducing IDEM's cleanup, website and other information to more than 13,000 addresses within the 5 year time-of-travel;
- IDEM sent notice letters and information requests to some of the more than 80 suspected sources within the one year time-of-travel around Site 0153;
- IDEM updated the public at a meeting held on August 17, 2017;
- In July 2017, IDEM issued notice of a Technical Assistance Grant (TAG) with a September 15, 2017 application deadline, and held two public applicant information sessions in August 2017 for potential TAG applicants; and
- Through 2017, the data provided by the local drinking water company for the public drinking water wells continues the trend of stable or decreasing levels of the contaminants of concern.

However, having involved and advised the community well beyond the boundary of Site 0153, IDEM needs to reaffirm that, for purposes of the NPL listing, the boundaries are as depicted in the Groundwater Plume Boundary Map for Site 0153. Both IDEM and the community will be relying on the attached Groundwater Plume Boundary Map for Site 0153.

Sincerely,

Assistant Commissioner

Office of Land Quality

cc: Meredith Gramelspacher, Brownfields, General Council Timothy J. Junk, IDEM, Office of Legal Council

Riverside Ground Water Plume Boundary Map Indianapolis, Marion County, Indiana Fig. 1-2 Ground Water Plume Area 53.09 Acres RS 27 Source: Esri, DigitalClobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community This map is intended to serve as an aid in graphic representation only. This information is not warranted for accuracy or other purposes. 0.075 0.15 0.3 Miles Mapped By: Shane Moore, Office of Land Quality Date:09/30/2015 Hamilton Municipal Wells Not Sampled 2014 Sampling Results (µg/L) Non Orthophotography

<u>Data</u> - Obtained from the State of Indiana Geographical
Information Office Library Approximate Ground Water Plume Boundary Document
- Sampling Locations Results Reference 4, Tables 3-5, pgs 562, 565, 568
- Sampling Locations Reference 107
- Well Head Protection Area Reference 60
- Plume created based on results in Reference 4, page 119
- Ottophotography - Obtained from Indiana Map Framework Data
(www.indianamap.org) Marion Wellhead 1 Year Delineation Wellhead 5 Year Delineation (www.indianamap.org)
Map Projection: UTM Zone 16 N Map Datum: NAD83 Johnson Morgan