



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
*Governor*

**Bruno L. Pigott**  
*Commissioner*

September 28, 2021

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

Dear Mr. Ballotti:

**Re: National Priority List De-Proposal**  
Riverside Groundwater Contamination  
Indianapolis, Marion County  
State Cleanup Site #0000635

The Indiana Department of Environmental Management (IDEM) is providing this letter in support of the United States Environmental Protection Agency (US EPA), Region 5, de-proposing its April 7, 2016, proposal of the Riverside Groundwater Contamination (Site 0153), Marion County, Indiana to the Superfund National Priorities List (NPL).

On June 8, 2017, a Memorandum of Agreement (MOA) was signed between the US EPA and IDEM that deferred the listing of Site 0153 on the NPL. The MOA specifies the expectations and obligations of each agency regarding addressing cleanup and closure of Site 0153. As part of the MOA, IDEM would conduct a comprehensive search for Potentially Responsible Parties (PRPs) to identify the potential source of chlorinated volatile organic compound (cVOC) detections identified historically in the raw groundwater in Indianapolis' Riverside and White River Municipal Drinking Water Production Wells (Wellfields). In addition, IDEM would oversee investigation of the potential sources of cVOC releases and manage the cleanup and closure of identified sources through one of the various remediation programs at IDEM and determine their contributions to risk exposure to the Wellfields.

Following the execution of the MOA, IDEM has conducted an exhaustive search for PRPs and potential cVOC sources in the Site 0153 project area. Through issuance of 140 Notice of Liability and Information Request letters, IDEM has required the investigation and completion of remediation as necessary to further reduce the risks to the Wellfields. It is important to note, that while an extensive investigation and evaluation of the area has been performed, no specific cVOC source or combination of sources has been identified as the definitive source of the impacts identified in the production wells. This supports the conclusion that there is no single source or group of sources that are causing impacts detected in the Wellfields, but rather the impacts have been caused by a large number of individual, disparate sources that were in

operation for decades and have contributed to a widely dispersed, low-level, commingled groundwater plume.

IDEM has completed and implemented a Community Involvement Plan, including holding several public information meetings in various neighborhoods within Site 0153, and scheduled bi-monthly stakeholder meetings with the City of Indianapolis, Citizens, and the Marion County Public Health Department (MCPHD) to coordinate responses to public concerns. IDEM awarded a Technical Assistance Grant (TAG) to a community group for document review, vapor intrusion risk assessment, and community outreach to help the community better understand the risks associated with Site 0153.

The Remedial Investigation (RI), Human Health and Ecological Risk Assessment (HHERA), Feasibility Study (FS), and the Proposed Remedial Action Plan (RAP) for Site 0153, demonstrates that IDEM has fulfilled the key criteria required under the MOA. Adequate information has been developed to understand the nature and extent of Site 0153 impacts, the overall risk associated with impacts to the Wellfields. IDEM will continue to provide oversight of cleanup actions of individual sites and PRPs, and of the public water supply under the existing permit, to ensure any remaining contamination in groundwater does not pose a human health risk exposure. A recommended remedial alternative if needed in the future, and a Proposed RAP that allows for the protection of the public water supply has been developed as a contingent measure.

If you have any questions or comments concerning this matter, please contact Haley Faulds, IDEM State Cleanup Project Manager, at (317) 234-3505 or Ryan Groves, IDEM State Cleanup Section Chief at (317) 232-3413.

Sincerely,

A handwritten signature in black ink that reads "Peggy Dorsey". The signature is written in a cursive style with a large initial "P" and "D".

Peggy Dorsey, Assistant Commissioner  
Office of Land Quality

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