INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

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Governor

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January 22, 2010

Mr. Bob Lewis
Environmental, Safety and DOT Compliance Manager
Genuine Parts Company
2999 Circle 75 Parkway
Atlanta, GA 30339

Mr. John Mundell
Mundell & Associates
110 South Downey Avenue
Indianapolis, IN 46219

Re: Additional Investigation Request
VRP #6991004 and #6061202

Dear Mr. Lewis and Mr. Mundell:

The Indiana Department of Environmental Management (IDEM) and the U.S. Environmental Protection Agency (EPA) met on January 21, 2010 to discuss the next steps required to identify the source of contamination affecting residential drinking water wells along Cossell and Vermont Streets in Indianapolis, Indiana. The three sites discussed include Genuine Parts, Michigan Plaza and Allison Transmission Plant 12. The following is a list of action items that are required for this effort:

1. The EPA proposes to temporarily shut down the remediation system on the Allison Transmission Plant 12 site to conduct a monitoring well water level gauging event at all three sites. The gauging event will be conducted by EPA's contractor. To conduct the gauging event, the EPA must secure access agreements from the property owners where the monitoring wells are installed. A list of all monitoring wells, the properties on which they are installed, and the property owner/contact information must be submitted to IDEM for the Genuine Parts and Michigan Plaza sites, and any other affected properties.
2. The EPA will obtain access to the residential homes to conduct vapor intrusion sampling, which will be coordinated with the Marion County Health Department.
3. The Allison Transmission Plant 12 site began additional investigation on January 11, 2010, including advancing six soil borings and completing two of those borings as temporary wells (one-inch piezometers). All sampling is expected to be completed by January 31, 2010 and results will be submitted to the EPA.
4. The IDEM and the EPA request additional monitoring well installation for both Genuine Parts and Michigan Plaza sites. For the Genuine Parts site, two or three permanent monitoring wells should be placed between the known Genuine Parts plume

and the residential drinking water wells. These can be installed either along Holt Road or in the Michigan Meadows complex, but need to be generally west of MW-166 and MW-167. They should be screened at the base of the aquifer, but IDEM and EPA recommend that the borings be extended 10-15 feet into the till to confirm its off-site extent and generalized thickness. Also, after reviewing the Remediation System Evaluation Report--dated December 9, 2009, the IDEM requests trend lines and estimated cleanup goals and times for MW-165, 166 and 167. Also, currently well nest MW-170 S and D is only sampled annually in the summer (June) by Michigan Plaza. In order to get a more complete data set, IDEM recommends that Genuine Parts begin sampling this well nest in the winter (December or January).

5. While the Michigan Plaza release initially contained primarily PCE, the aggressive bioremediation effort has increased vinyl chloride concentrations over 1000 times in some locations and has changed the equilibrium of the aquifer. For the Michigan Plaza site, at least one permanent monitoring well should be placed between the known Michigan Plaza source behind the building and the residential drinking water wells. This well should be installed west or southwest of MMW-P-3D. Potential locations are on the Floral Park property or along the utility easement which extends along the south side of the Michigan Street parcels to Holt Road. The monitoring well should be screened at the base of the aquifer, but IDEM and EPA recommend that the borings be extended 10-15 feet into the till to confirm its off-site extent and generalized thickness. It should also be noted that after IDEM's review of the Quarterly Monitoring Progress Report – 3rd Quarter, 2009, dated December 16, 2009, groundwater elevation data indicate that Little Eagle Creek may be a recharge boundary at least for the shallow wells. This has the effect of pushing groundwater flow to the west locally.

The IDEM and the EPA will be meeting again to discuss these three sites on February 9, 2010. Please respond to the above comments before this date. If you have any questions, please contact me at (317) 233-2991, (800) 451-6027, or at ebrittai@idem.in.gov.

Sincerely,

Erin Brittain

Erin Brittain, Project Manager
Voluntary Remediation Program
Office of Land Quality

Richard Harris

Richard Harris, Section Chief
Voluntary Remediation Program
Office of Land Quality

cc: Andy Gremos, Keramida, 401 North College Avenue, Indianapolis, IN 46202
Pam Thevenow, Marion County Health Department, Water Quality & Hazardous Materials Management, 3838 North Rural Street, Indianapolis, IN 46205
Brian Schlieger, Environmental Protection Agency, Superfund Division, 77 West Jackson Blvd. (SE-5J), Chicago, IL 60604
Shelly Lam, Environmental Protection Agency, 2525 North Shadeland Avenue, Indianapolis, IN 46219