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

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March 30, 2011

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

Re: Quarterly Monitoring Progress Report-4th Quarter 2010
Michigan Plaza
3801-3823 West Michigan Street
Indianapolis, Indiana
VRP #6061202

Dear Mr. Mundell:

This office has completed review of the Quarterly Monitoring Progress Report—4th Quarter 2010 received February 16, 2011 for the Michigan Plaza facility in Indianapolis, Indiana. IDEM has the following comments.

Comments:

1. Vinyl chloride concentrations doubled from July 2010 to October 2010 in wells MMW-1S, MMW-P-01, MMW-P-03S, MMW-P-06, MMW-P-07, and MMW-C-01. Vinyl chloride concentrations range from non-detect to 12,900 ppb. Vinyl chloride seems to be gradually declining in the injection areas, but it is unclear whether this is from bioremediation or from dilution as the plume moves downgradient. If vinyl chloride concentrations remain at these levels, an alternative remedial approach will need to be performed to reduce the concentrations.
2. IDEM does not have a clear understanding of why there is so much more DCE and vinyl chloride than there was of PCE in groundwater. Pre-remedial PCE levels were in the middle 100s to low 1000s. Vinyl chloride production is, proportionally, an order of magnitude greater in each of the wells affected by the CAP 18. Clarification is necessary to understand the bioremediation process that is occurring at the site.
3. Vinyl chloride concentrations are above the 1-year Ground Water Screening Level for vinyl chloride. Therefore, residential properties within 100 feet of the groundwater plume, including the residence to the west of the plaza, should be investigated for vapor intrusion as soon as possible.

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