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August 23, 2017

Indiana Department of Environmental Management ("IDEM")  
Office of Land Quality (OLQ)/Compliance and Response Branch ("CRB")  
ATTN: Mr. John Naddy  
Technical Environmental Specialist E7  
100 N. Senate Ave. IGCN 1101  
Indianapolis, Indiana 46204

Re: 30-Day Response to Violation Letter  
*Indiana Transportation Museum*  
SCP No. 7100207  
825 Park Drive  
Noblesville, IN 46060

Dear Mr. Naddy:

On behalf of The Indiana Transportation Museum ("ITM"), The Environmental Liability and Asset Management Group, LLC (dba The ELAM Group) is providing the following information in response to the IDEM CRB's *Violation Letter*, dated 7/20/17, to inform IDEM of the ITM's progress in addressing the violations for the above-referenced site. The ITM received IDEM's letter on 7/24/17, and IDEM requested that the violations be completed within 30 days of receipt of the letter. Due to the following reasons outlined below, the ITM respectfully requests an extension of time to complete this work.

- 1. Materials Inventory (June-July 2017).** Prior to the IDEM CRB's inspection on 6/9/17, The ELAM Group began a full inventory of materials within the ITM's possession. This inventory spanned several days throughout several different weeks. The time available to complete the inventory was limited due to the ITM's operating hours and also because of the unsafe access to some of the locations where the materials are located. Consequently, the inventory of 1,060 items took nearly 2 months and was completed by 7/26/17.
- 2. Contractor Selection (July-August 2017).** The materials inventory and locality of wastes within the rail yard was necessary to properly identify qualified contractors who could handle the waste removal work. This bidding and selection process was conducted during July and early August. Time was necessary to vet



the qualified contractors, allow each to visit the site and provide qualified bids for the scope of work. A contractor has now been selected.

3. **Characterization and Waste Profiling (August-September 2017).** With the materials inventory complete and a qualified waste contractor selected, The ELAM Group can now characterize the waste. This work is scheduled to begin on 8/28/17 and will last through early September. Analytical samples will be collected to determine the proper characterization of each waste stream. Thereafter, waste profiles will be generated. If hazardous waste profiles are necessary, the approval process could take 30 days after submittal to the disposal facility.
4. **Removal (September-October 2017).** After waste profiles have been completed with each applicable disposal facility, the wastes will be promptly removed from the site. We anticipate that the non-hazardous waste will be loaded, transported and disposed at a licensed facility in mid-September and that any hazardous waste will be loaded, transported and disposed in October.
5. **Reporting (August-November 2017).** The ELAM Group will prepare 60-Day and 90-Day Progress Reports while the waste characterization and removal activities are ongoing. Upon receipt of the final fully-executed waste manifests, The ELAM Group will then document the ITM's compliance with the IDEM CRB's violations as requested in your letter, dated 7/20/17.

Due to the above schedule, an extension of time will be necessary through 11/30/17. The ELAM Group therefore respectfully requests an extension until then in order to conduct the work in a safe, compliant and properly documented manner.

Sincerely,

Pat Likins  
Project Manager

James P. Hogan, LPG #2166  
President & CEO

cc: David Gillay, Esq., Barnes & Thornburg LLP