



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 27, 2017

Mr. Craig R. Pressler, Registered Agent
Indiana Transportation Museum, Incorporated
136 South 9th Street, Suite 104
Noblesville, IN 46060

Dear Mr. Pressler:

Re: Initial Site Investigation Work Plan
Indiana Transportation Museum
825 Park Drive
Noblesville, Hamilton County
State Cleanup Site #7100207

The Indiana Department of Environmental Management (IDEM) has reviewed the report titled *Initial Site Investigation Work Plan, State Cleanup Program (SCP) No. 7100207, Indiana Transportation Museum, 825 Park Drive, Noblesville, IN 46060* (Initial Site Investigation Work Plan), prepared and submitted by The Elam Group, Suite 147, 176 West Logan Street, Noblesville, Indiana 46060. The Initial Site Characterization Work Plan was submitted in response to a release of hazardous substances and/or petroleum at the Indiana Transportation Museum located at 825 Park Drive, Noblesville, Indiana (Site). The Initial Site Characterization Work Plan is available in IDEM's virtual file cabinet (VFC) as document number 80506423.

The document was evaluated based on IDEM's *Remediation Closure Guide (RCG)* and *Remediation Program Guide (RPG)* guidance manuals and *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW846)* Third Edition, Update III. Based on the data submitted, the work plan is inadequate to determine if the samples collected will meet and comply with the required data Quality Objectives. In addition, the following IDEM comments must be addressed in the revised Initial Site Investigation Work Plan:

Comments

1. The work plan states that soil samples will be collected from soil borings based on field screening using a photoionization detector (PID) and an X-ray fluorescence analyzer (XRF), and that groundwater samples will be collected from temporary wells at each boring location. The initial site investigation work plan provides no sample collection procedures such as soil collection via SW846 Method 5035A for volatile organic chemicals (VOCs); polychlorinated biphenol (PCB) wipe sampling if determined necessary; groundwater collection via bailers, low-flow, peristaltic pump, etc. There are no analytical methods listed for any of the analytical parameters, sample volumes, container types, holding times, sample labeling information/designation, packing and shipping information. This information absolutely must be provided for evaluation.

2. Soil and groundwater analytical parameters are identified as VOCs, semi-volatile organic chemicals (SVOCs), PCBs, and Resource Conservation and Recovery Act (RCRA) Metals (Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, and Silver), and potential Asbestos. Analysis of Chromium (Cr) is assumed to be Total Chromium. Chromium must be speciated, and both Total Chromium and Hexavalent Chromium analyzed and reported. If only Total Chromium is reported the results will be assumed to be 100% Hexavalent Chromium.
3. The document indicates Task 4 as including Level IV laboratory analysis for soil and groundwater. However, there is no mention of field or laboratory Quality Assurance/Quality Control (QA/QC) samples. Field duplicates, matrix spike/matrix spike duplicates, trip blanks, equipment blanks for non-dedicated equipment, etc., are required. Field QA/QC samples are collected at a rate of one per twenty samples per matrix per analytical parameter. This information is essential in determining precision, accuracy and representativeness of the sampling event and sample data.
4. According to Figure 1, there are multiple rail cars identified with material storage; however, there are no proposed sampling efforts in these areas except for at rail car #25011 on Track #9 and one of two rail car maintenance pits. In addition, the rail car maintenance pit noted near storage rail car #47181 on Track #6, and near storage rail cars E005 and #545 on Track #6 are not being investigated. The closest borings to this second maintenance pit are SB-8 and SB-9 in the vicinity of Track #7. Clarification for excluding the rail car storage areas and the western maintenance pit is required.
5. As a reminder, when final nature and extent is determined or closure is being requested, full QA/QC documentation, including raw data, must be submitted for data validation and verification. Guidance for minimum data documentation requirements (MDDRs) and full QA/QC criteria can be found in RCG Section 3.9 and available on the IDEM website at: www.in.gov/idem/cleanups/files/remediation_closure_guide.pdf

Conclusions

The initial site investigation work plan is inadequate to determine the nature and extent of contamination. Additional information is required to determine if the collected samples will meet and comply with the Data Quality Objective portion of the regulatory requirement.

IDEM should be provided a minimum of two weeks advance notice for field activities. Please submit the revised Initial Site Investigation Work Plan to IDEM within 30 days of the date of this letter in accordance with IDEM Office of Land Quality document submittal guidelines, which are available online at www.in.gov/idem/landquality/2368.htm, to the following address:

Indiana Department of Environmental Management
Office of Land Quality
State Cleanup Section, Attn: Mr. Kenneth C. McDaniel
100 North Senate Avenue, IGCN, Room 1101
Indianapolis, IN 46204-2251

See Attachment A for procedures to resolve technical disagreements utilizing IDEM's Technical Review Panel.

If you have any questions or comments concerning this matter, please contact me at 317-691-6370 or you may call IDEM's toll free number at (800) 451-6027 and ask for Mr. Kenneth C. McDaniel.

Sincerely,



Kenneth C. McDaniel
State Cleanup Section
Office of Land Quality

KC:tr

cc: IDEM Site # 7100207

Mr. Stephen Thill, IDEM, OLC Attorney

cc: Mayor John Ditslear, City of Noblesville

16 South 10th Street, Noblesville, IN 46060

Hamilton County Health Department

18030A Foundation Drive, Noblesville, IN 46060

Michael A. Howard, Attorney for the City of Noblesville, Howard and Associates

694 Logan Street, Noblesville, IN 46060

Mr. David Gillay, Barnes and Thornburg

11 South Meridian Street, Suite 1313, Indianapolis, IN 46204

Scott Noel, President, Parks and Recreation Board, City of Noblesville

16 South 10th Street, Noblesville, IN 46060

Mr. James P. Hogan, LPG, The Elam Group

176 West Logan Street, Suite 147, Noblesville, IN 46060

Ms. Patricia Likins, The Elam Group

176 West Logan Street, Suite 147, Noblesville, IN 46060

Attachment A: Technical Review Panel Announcement

Technical Review Panel

IDEM's Office of Land Quality Announces New Technical Review Panel for VRP and State Cleanup Program Technical Disputes

During the course of some remediation projects, technical disagreements between the Indiana Department of Environmental Management (IDEM) staff and external entities arise. We recognize that these disputes can often cause delays and frustration on both sides of the issue. Therefore, the IDEM has developed a mechanism for settling technical disagreements called the Technical Review Panel (Panel). The IDEM assembled a pool of approximately 12 IDEM scientists from outside the Office of Land Quality (OLQ) each having expertise applicable to the technical issues we commonly encounter. When the Panel is needed we will assemble a small group of those scientists with the appropriate expertise to help settle the dispute.

We envision the basic process to be as follows: If the IDEM project manager and the external party cannot agree on a technical issue within a reasonable time, the IDEM project manager will elevate the dispute to their Remediation Branch managers and senior Science Service technical staff for review. If the dispute is still not settled, the external party may contact the Remediation Services Branch Chief directly and request the issue be reviewed by the Panel. Each side will provide the Panel a short written summary of their technical view point prior to participating in an informal discussion with the Panel. The Panel will then provide written recommendations.

The Technical Review Panel is a pilot and at this time will only be used for disputes between our State Cleanup Program and/or the Voluntary Remediation Program (VRP) project managers and external parties.

Note: Any decision produced by the Technical Review Panel is not an agency action as defined in IC § 4-21.5-1-4 or an order as defined in IC §4-21.5-1-9. This decision is not subject to administrative review because it is not a determination of any legal rights, duties, privileges, immunities, or other legal interests, and because it is issued pursuant to an informal procedure for dispute resolution as allowed by IC 4-21.5-3-34 (a).

Our goal is to enable remediation sites to move forward in a timely manner and to provide external entities a forum outside the OLQ to help resolve technical disagreements with the VRP and State Cleanup Program project managers.

This review process is available immediately. If you would like to request a review by the Panel, please contact the Remediation Services Branch at (317) 232-4535 or scp@idem.in.gov.

Source: <http://www.in.gov/idem/landquality/2504.htm>