



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

September 5, 2017

Ms. Pat Likins  
The ELAM Group  
176 West Logan Street, Suite 147  
Noblesville, Indiana 46060

Re: 30-Day Response to Violation Letter  
Indiana Transportation Museum  
825 Park Drive  
Noblesville, Indiana

Dear Ms. Likins:

This letter is addressing your August 23, 2017, 30-Day Response to Violation Letter. IDEM had requested that the Indiana Transportation Museum respond to violations outlined in a Violation Letter dated July 20, 2017. Your response outlined both a plan to address the violations cited in the IDEM Violation Letter and a request for additional time to implement a plan to correct the cited violations.

The scope of work proposed and outlined by The ELAM Group (ELAM) is as follows:

1. Conduct a materials inventory. This was to have been completed by 7/26/2017.
2. Select a contractor to handle the waste removal work. As of the time of the ELAM response, the contractor has been selected.
3. Conducting removal activities. Removal activities are scheduled to be completed by the end of October 2017.
4. Reporting activities. ELAM proposes that 60-day and 90-day Progress reports will be prepared and submitted to the IDEM.

In response to the original 30-Day Response to Violation Letter IDEM requests the following:

1. The completed material inventory shall be submitted to the IDEM –Office of Land Quality (OLQ) Compliance and Response Branch. This inventory shall include the 1060 items referenced in the ELAM 30-Day Response to Violation Letter. The inventory shall be submitted by September 15, 2017.
2. The waste characterizations are scheduled to begin on August 28, 2017 and be completed by ‘early-September’. The waste characterizations shall be submitted to the IDEM –OLQ Compliance and Response Branch by October 2, 2017.
3. Documentation of waste disposal, both hazardous wastes and non-hazardous wastes, as well as the documentation of the disposition of any other materials included in the inventory of 1,060 items referenced in the ELAM 30-day Response to Violation Letter that were determined not to be a waste. The requested disposal and/or disposition information shall be submitted to the IDEM

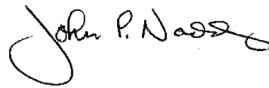


– Office of Land Quality Compliance and Response Branch by November 6,  
2017.

Additionally, any activities related to the assessment and/or remediation of contaminated ground should be coordinated with staff from IDEM, OLQ, State Cleanup Section.

If you have any questions about the requirements set forth in this letter, please contact me at 317-233-0404 or [jnaddy@idem.in.gov](mailto:jnaddy@idem.in.gov). Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John P. Naddy", with a stylized flourish at the end.

John P. Naddy  
Hazardous Waste Compliance Branch  
Office of Land Quality

cc: Ms. Susan Lowry, IDEM, OLQ, Hazardous Waste Compliance Section  
Mr. Harry Atkinson, IDEM, OLQ, State Cleanup Section  
Mr. Corey Webb, IDEM, OLQ  
Mr. Ryan Clem, IDEM, Communications and External Relations

## EMANUEL, DONNA

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**From:** Patricia Likins <patricia.likins@elamusa.com>  
**Sent:** Wednesday, August 23, 2017 2:23 PM  
**To:** NADDY, JOHN  
**Cc:** James Hogan; Gillay, David  
**Subject:** Indiana Transportation Museum  
**Attachments:** 20170823\_INHN825P6.1\_CRBVioLtr30-DayResp.gdoc

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John,

As we discussed, this transmits a response to your 7/20/17 letter, providing you with details on the progress that has been made at the Indiana Transportation Museum site, a schedule going forward, and a request for an extension for full compliance with your 7/20/17 letter.

Please let me know if you can approve the extension of time, and if you need further information. Also please advise if you need The ELAM Group to submit a hard copy of this letter.

Thank you for your consideration.  
Sincerely,  
Pat

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**Patricia Likins**



Project Manager  
(888) 510-3526 x109 · Cell: (463) 201-0288 · [elamusa.com](http://elamusa.com)

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## EMANUEL, DONNA

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**From:** Patricia Likins <patricia.likins@elamusa.com>  
**Sent:** Wednesday, August 23, 2017 2:32 PM  
**To:** NADDY, JOHN  
**Cc:** James Hogan; Gillay, David  
**Subject:** Re: Indiana Transportation Museum  
**Attachments:** 20170823\_INHN825P6.1\_CRBVioLtr30-DayResp(Cert).pdf

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Hi all,  
Sorry, this document should work. Thank you!  
Pat

On Wed, Aug 23, 2017 at 2:23 PM, Patricia Likins <[patricia.likins@elamusa.com](mailto:patricia.likins@elamusa.com)> wrote:

John,

As we discussed, this transmits a response to your 7/20/17 letter, providing you with details on the progress that has been made at the Indiana Transportation Museum site, a schedule going forward, and a request for an extension for full compliance with your 7/20/17 letter.

Please let me know if you can approve the extension of time, and if you need further information. Also please advise if you need The ELAM Group to submit a hard copy of this letter.

Thank you for your consideration.

Sincerely,  
Pat

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**Patricia Likins**



The **ELAM** Group

Project Manager  
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Twitter: [@elam\\_usa](https://twitter.com/elam_usa)  
Tel: 888-510-ELAM  
Fax: 317-567-9022

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

## EMANUEL, DONNA

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**From:** Patricia Likins <patricia.likins@elamusa.com>  
**Sent:** Wednesday, September 13, 2017 8:40 AM  
**To:** EMANUEL, DONNA  
**Subject:** Re: Indiana Transportation Museum - 30 Day Extension

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Donna,  
I received the email, thank you!  
Pat

On Tue, Sep 5, 2017 at 11:40 AM, EMANUEL, DONNA <[DEMANUEL@idem.in.gov](mailto:DEMANUEL@idem.in.gov)> wrote:  
Dear Ms. Likins,

Attached is the "30-Day Response to Violation Letter" that Mr. John Naddy prepared for **Indiana Transportation Museum** which is located at **825 Park Drive, Noblesville, Hamilton County, Indiana** for your review. **Once you have received this email would you please respond back to me (via e-mail) that you have received the document for our records.**

Thank you

*Donna Emanuel, Administrative Assistant  
IDEM/Office of Land Quality - Compliance Branch  
Mail Code: 66-20 (1368)  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
[demanuel@idem.in.gov](mailto:demanuel@idem.in.gov)  
[\(317\) 234-6923](tel:(317)234-6923)  
[\(317\) 234-0428](tel:(317)234-0428) - Fax*

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**Patricia Likins**



The **ELAM** Group

Project Manager

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