



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

Mike Braun
Governor

Clint Woods
Commissioner

February 24, 2025

Chase Forman, CPG
Legacy Site Manager
GE Aerospace, US
Chase.Forman@ge.com

Re: 2024 Annual Report
Sherman Park Facility (Former Thomson Consumer Electronics Facility)
600 North Sherman Drive
Indianapolis, IN 46201
VRP #6020801

Dear Mr. Forman:

The Indiana Department of Environmental Management (IDEM) has reviewed the 2024 Annual Progress Report (Ramboll, February 6, 2025) for the Sherman Park Facility site located at 600 N. Sherman Dr. in Indianapolis, Indiana.

The report was uploaded to the IDEM Virtual File Cabinet (VFC) as document #83761793. Further site history can be found in the VFC located on the IDEM website vfc.idem.in.gov. This technical letter contains a brief background summary including comments generated during our review of the above-mentioned report.

Background

The 50-acre site is in a mixed industrial, commercial, and residential area. A CSX railroad track that runs in a northeast-southwest orientation divides the site into eastern and western sides. There were historically seven buildings on-site: five on the east side of the CSX tracks and two on the west side. The property was purchased by the Radio Corporation of America in approximately 1920. General Electric owned the site from June 1986 until September 1987 when it was sold to Thomson Consumer Electronics. The site was historically used for manufacturing radio and television components. The property is primarily vacant, with the northern portion used by a recycling facility. The site is currently owned by the City of Indianapolis and is undergoing redevelopment.

The Constituents of Concern (COCs) are trichloroethylene (TCE), 1,1,1-Trichloroethane (1,1,1-TCA) and their breakdown products. Investigations of soil and groundwater contamination began at the site in 1999 and identified four on-site source areas: the former Chemical Storage Building, the former Solvent Tank Area, the former Metal Plating Area, and the 1,1,1-Trichloroethane Still Area. These source areas are located under the former main building. The COCs were found to impact soil and groundwater on-site at concentrations above industrial closure levels. Site investigations also identified an off-site source contributing to the contamination found in the deep groundwater bearing unit, a former chemical storage/distribution facility located directly

Visit on.IN.gov/survey or scan the QR code to provide feedback.

We appreciate your input!



across Michigan Street (THAN/Harcos, VRP #6011005). Soil vapor investigations performed in 2006 at the main building prior to its demolition confirmed the presence of COCs above commercial levels, suggesting the risk of vapor intrusion for buildings constructed above the source areas. Subsequently, environmental restrictive covenants (ERCs) were recorded on-site, requiring the installation of a vapor mitigation system (VMS) for residential use. The ERCs also include: an agricultural restriction unless plantings are put in raised beds with clean soil, a groundwater extraction restriction, a commercial/industrial use only restriction, operation and maintenance of engineering controls, and soil excavation provisions.

Bio-enhancement injections were performed in 2011, 2013, 2015, 2017, and 2023 to reduce the source areas. Post-remedial groundwater monitoring results indicate the injections to be effective at reducing contaminant levels.

The remedial action objectives are based on the Remediation Closure Guide (RCG) Screening Levels (SLs). The following comments were noted during our review of the above-mentioned report:

Comments

1. Iso-concentration plume maps for each of the cVOCs in the upper, middle, and lower water bearing unit are provided in Figures 6a through 8f. **Based on the figures, IDEM finds the cVOCs remain delineated.**
2. Ramboll concludes the cVOC iso-concentration maps (Figures 6a through 8f) and cVOC concentration-vs-time charts for individual wells (Appendices D-1 and D-2) show considerable progress in reductive dechlorination has been made since the baseline conditions prior to the first amendment injections performed in 2011. **IDEM concurs; however, IDEM could not locate these Appendices. The trend charts appear to be included in Appendices C-1, C-2, and C-3.**
3. Ramboll also concludes the reductive dichlorination appears to be the greatest for TCE and 1,1-dichloroethylene (1,1-DCE). As expected, there has been an increase in the concentration of the breakdown products for both TCE and 1,1,1-TCA, which are both formed and destroyed during the reductive dichlorination process. **IDEM concurs.**
4. Since long-term plume behavior monitoring began in April 2024, three sampling events have taken place. **Provided no additional injections take place, one additional sampling event is needed to provide adequate data for a preliminary evaluation of long-term plume behavior.**
5. Ramboll proposes continuation of methane monitoring in 2025. If methane continues to be non-detect on a regular basis, a request to cease soil gas sampling may be presented. **This is acceptable.**
6. Ramboll requests a change in the sampling procedures for monitoring wells (MWs) W-8, W-9, and MW-426, and proposes low-flow sampling instead of passive diffusion bags during the 2025 annual sampling event. **This is acceptable.**
7. MWs W-42, W-11D, MW-131, MW-273, MW-131, and MW-322 are reported as vandalized and were not sampled. **Please provide the status of these wells. If the wells cannot be repaired, they must be abandoned properly.**

IDEM finds the proposed change in sampling procedures to be acceptable. Please respond within 45 days of receipt of this letter confirming the status of the reported vandalized monitoring wells. If you have any questions, please contact me at (317) 234-9731, (800) 451-6027, or via email CFredin@idem.IN.gov.

Sincerely,



Claire Fredin,
Project Manager
Voluntary Remediation Program
Office of Land Quality

cc: Patrick Rohan, CHMM, Senior Managing Consultant, Ramboll (prohan@ramboll.com); Eric Merrifield, Counsel, GE Aerospace (eric.merrifield@ge.com); Colin Van Dyke, Counsel, Anderson & Krieger LLP (cvandyke@andersonkrieger.com); Tracy Concannon, Indiana Brownfields Program, Indiana Finance Authority (tconcann@ifa.in.gov); Kirby Piers, Administrator – Real Estate & Brownfield Redevelopment, City of Indianapolis (piers.kirby@indy.gov)

It is the goal of IDEM to enable remediation sites to move forward in a timely manner. If an impasse has been reached over technical issues, a Technical Review Panel of non OLQ scientists is available to review and offer a non-binding opinion to help resolve technical disagreements with the VRP and State Cleanup Program project managers. The goal is to facilitate progress at your site. This review process is available immediately. If you would like to request a review by the Panel, please contact Kevin Davis, Remediation Services Branch Chief for the Office of Land Quality, at 317-232-4535 or kdavis2@idem.in.gov.

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).