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BY ELECTRONIC MAIL

April 6, 2026

Ms. Claire Fredin

Project Manager
IDEM Office of Land Quality
Voluntary Remediation Program
100 North Senate Avenue
Indianapolis, IN 46204

**Subject: Responses to IDEM Comments, 2025 Annual Progress Report (APR), Sherman Park Facility
(Former Thomson Consumer Electronics Facility)
Indianapolis, Marion County, Indiana
VRP #6020801
IDEM VFC #83929265 / Ramboll PN #1940103494**

Dear Ms. Fredin:

The General Electric Company (GE) has received and reviewed the March 5, 2026 letter to GE that provided comments on the Annual Progress Report (APR) submitted to the Indiana Department of Environmental Management (IDEM) on February 5, 2026.

GE appreciates the opportunity to provide you with this response to comments letter and looks forward to working with you collaboratively on this project in the future.

Sincerely,

Chase C. Forman, CPG
Senior Specialist, EHS Services – Remediation
GE Aerospace

cc:

Attachments: Response to Comments – March 5, 2026 Letter from IDEM to GE



Response to Comments

IDEM's comments on the 2025 APR are provided below in **bold** with GE's responses provided in *italics*:

Comments

- 1. Concentrations of naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, and 1,2,4-trimethylbenzene were observed above CLs in MW-333 during the July 2025 sampling event. These results were not summarized in Table 5 and should be included in future tables.**

The listed petroleum-related chemicals observed above the closure levels (CLs) in MW-333 are not considered to be part of the identified chemicals of concern (COC) as listed in the IDEM-approved Remediation Work Plan (RWP), specifically Section 7.3 and Tables 6.1 and 6.2. However, a separate table will be provided in future APRs that identify "other constituents" above laboratory reporting limits.

- 2. Based on the sampling results, the isoconcentration maps, the presence of ethane and ethene, and trend time charts, Ramboll concludes that there has been considerable progress in dichlorination since the first amendment injections in 2011. Therefore, Ramboll recommends:**

- a. Well abandonment of select monitoring wells (MW) that show stable to decreasing trends and contain low levels of cVOCs detections or have historically lacked cVOCs during multiple years of sampling. IDEM reviewed the list of proposed wells to be abandoned and finds it to be acceptable. Abandonment logs can be included in the final Remediation Completion Report.**

GE appreciates IDEM's approval of the abandonment of these monitoring wells. Ramboll will initiate coordination of well abandonment activities for the applicable wells with the work anticipated to be completed prior to the end of 2026. An Indiana-licensed well driller will perform the well abandonment activities and upon abandonment, a written notice for each abandoned well (Record of Water Well-State Form 3560) will be supplied to the Indiana Department of Natural Resources (INDNR 312 IAC 13-10-2) within thirty days after plugging is completed. Copies of the well abandonment logs will be included with the Remediation Completion Report.

- b. Refinement of the current well sampling scope. IDEM agrees that the remaining MWs should be sampled using the previously established schedule.**

Ramboll will sample the remaining monitoring wells that are not scheduled for abandonment following the previously established sampling schedule as provided in the RWP.

- c. Mann-Kendall statistical evaluation of the applicable MWs. This is acceptable. IDEM notes that there have been four sampling events conducted since October 2024, and that there is sufficient data to conduct a preliminary long-term plume behavior evaluation.**



A Mann-Kendall statistical evaluation (M-K evaluation) will be performed after the fourth quarter groundwater sampling event in 2026 which will provide more than sufficient data in order to conduct a long-term behavior evaluation. Upon review of the M-K evaluation, a technical memo summarizing our findings will be provided which may suggest additional modifications to the monitoring well sampling regime and frequency of well sampling.

- 3. Concentrations of methane were above the IDEM published level of 10,000 parts per billion (ppb) in 11 wells; however, methane in soil gas probes SGP-1 to SGP-3, located on the southern part of the property, were non-detect during 2025 sampling events. Based on these soil gas results, Ramboll recommends ceasing sampling after the second 2026 quarterly sampling event. Per IDEM guidance Addressing Methane at Anaerobic Bioremediation Sites, soil gas should continue to be monitored. Alternatively, Ramboll may provide additional lines of evidence to support ceasing soil gas sampling.**

Comment acknowledged. Ramboll will continue soil gas monitoring activities as part of quarterly groundwater sampling activities.



ATTACHMENTS

March 5, 2026 IDEM Comment Letter



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mike Braun
Governor

Clint Woods
Commissioner

March 5, 2026

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

Re: 2025 Annual Progress 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 2025 Annual Progress Report (Ramboll, February 5, 2026) for the Sherman Park Facility site located at 600 North Sherman Drive in Indianapolis, Indiana.

The report was uploaded to the IDEM Virtual File Cabinet (VFC) as document #83929265. 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 consists primarily of paved surfaces and concrete building foundations. It is in a mixed 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.

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

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groundwater bearing unit, a former chemical storage/distribution facility located directly 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, 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 Risk-Integrated Systems of Closure (RISC) Closure Levels (CLs). The following comments were noted during our review of the above-mentioned report:

Comments

1. Concentrations of naphthalene, 1-methylnaphthalene, 2-methylnaphthalene, and 1,2,4-trimethylbenzene were observed above CLs in MW-333 during the July 2025 sampling event. These results were not summarized in Table 5 and should be included in future tables.
2. Based on the sampling results, the isoconcentration maps, the presence of ethane and ethene, and trend time charts, Ramboll concludes there has been considerable progress in dichlorination since the first amendment injections in 2011. Therefore, Ramboll recommends:
 - a. Well abandonment of select monitoring wells (MW) that show stable to decreasing trends and contain low levels of cVOCs detections or have historically lacked cVOCs during multiple years of sampling. *IDEM reviewed the list of proposed wells to be abandoned and finds it to be acceptable. Abandonment logs can be included in the final Remediation Completion Report.*
 - b. Refinement of the current well sampling scope. *IDEM agrees that the remaining MWs should be sampled using the previously established schedule.*
 - c. Mann-Kendall statistical evaluation of the applicable MWs. *This is acceptable. IDEM notes that there have been four sampling events conducted since October 2024, and that there is sufficient data to conduct a preliminary long-term plume behavior evaluation.*
3. Concentrations of methane were above the IDEM published level of 10,000 parts per billion (ppb) in 11 wells; however, methane in soil gas probes SGP-1 to SGP-3, located on the southern part of the property, were non-detect during 2025 sampling events. Based on these soil gas results, Ramboll recommends ceasing sampling after the second 2026 quarterly sampling event. Per IDEM guidance *Addressing Methane at Anaerobic Bioremediation Sites*, soil gas should continue

to be monitored. Alternatively, Ramboll may provide additional lines of evidence to support ceasing soil gas sampling.

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)
Tom Angel, Counsel, GE Aerospace (Tom.Angel@geaerospace.com)
Colin Van Dyke, Counsel, Anderson & Krieger LLP (cvandyke@andersonkrieger.com)
Kristen Gagalis, Counsel, Anderson & Krieger LLP (kgagalis@andersonkrieger.com)

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).