



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

November 4, 2021

### VIA EMAIL

Mr. Kevin Still, Registered Agent  
Co-Alliance, LLP  
Building 1000  
5250 East US Highway 36  
Avon, Indiana 46123

Dear Mr. Still:

**Re: Initial Site Investigation Report**  
Co-Alliance, LLP  
406, 407, 407 (Rear) South Front Street  
Thorntown, Indiana, Boone County  
State Cleanup Site #0000948

The Indiana Department of Environmental Management (IDEM) has reviewed the *Initial Site Investigation* (ISI Report), dated May 13, 2021, prepared and submitted by American Environmental Corporation (American Environmental). The ISI Report was submitted in response to a release(s) of hazardous substances at the former Co-Alliance facility, located at 406, 407, 407 (Rear) South Front Street, Thorntown, Indiana, Boone County (Site). The ISI Report is available in IDEM's Virtual File Cabinet (VFC) as Document Number 83204137. The VFC is located on IDEM's website at <https://vfc.idem.in.gov/DocumentSearch.aspx>.

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 Site closure at this time is appropriate. Please note the following comments.

### Comments

1. Soil and groundwater samples were analyzed for volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), lead, nitrates, nitrites, nitrates+nitrites, potassium, phosphorus and pesticides. The pesticide Dieldrin was found in one soil boring, SB-3, at 2-4 feet below ground surface (bgs) at 86.2 milligram/kilogram (mg/kg). This is above the migration to groundwater screening level (MGWSL) of 15 mg/kg but well below the residential soil screening level (RSSL) of 480 mg/kg. All other results in all other soil borings were below all screening levels. For this reason, a remedy is not necessary for the soil direct contact exposure scenario.

2. With the exception of total lead in one sample, all results were below groundwater screening levels (GWSLs). The dissolved lead sample in this boring was below GWSLs. For this reason, a remedy is not necessary for the groundwater direct contact exposure scenario.
3. No VOCs were detected in either soil or groundwater samples. For this reason, a remedy is not necessary for the vapor intrusion exposure scenario.
4. The minimum data documentation requirements (MDDRs) were met in the document. The data was evaluated and found to be usable for the overall project goal.

### Conclusions

No additional investigation appears warranted at this time. Based on soil and groundwater results, IDEM finds that closure is appropriate for this site.

To reduce paper usage, documents are required to be submitted via **State Cleanup's e-Submission Portal (ESP)**. Paper copies are no longer required or accepted; however, paper copies of figures and tables may be requested by the Project Manager.

**To request access to the ESP**, complete State Agency Form 57103, available on IDEM's website at [idem.in.gov/myesubmission](http://idem.in.gov/myesubmission). Please note that the size limit for an electronic document remains at 75 megabytes (MB) per IDEM Office of Land Quality electronic document submittal guidelines, which are available online at: [www.in.gov/idem/landquality/2368.htm](http://www.in.gov/idem/landquality/2368.htm).

If you have any questions or comments concerning this matter, please contact me at 317/233-2406, or you may call IDEM's toll free number at (800) 451-6027 and ask for Anne Weinkauf.

Sincerely,

*Anne Weinkauf*

(this document is electronically signed)

Anne Weinkauf  
State Cleanup Section  
Office of Land Quality

AW:

cc: IDEM Site #0000948

Jim Madding, American Environmental  
Chris Braun, Plews Shadley Racher & Braun LLP  
Boone County Health Department

If a technical dispute arises and cannot be resolved in a timely manner, please see IDEM's website for information about appealing technical decisions through the Office of Land Quality's Technical Review Panel pilot program at: [www.in.gov/idem/cleanups/2370.htm](http://www.in.gov/idem/cleanups/2370.htm).