

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb

Governor

Brian C. Rockensuess

Commissioner

April 7, 2022

VIA EMAIL cfewell@greenfieldin.org

The Honorable Chuck Fewell
Mayor of the City of Greenfield
10 South State Street
Greenfield, Indiana 46140

Dear Mayor Fewell:

Re: Environmental Investigation Summary Report

Dated February 28, 2022

VFC <u>83288047</u> Greenfield Dump Hancock County

SW Program ID 30-UP-005

On March 1, 2022, we received the *Environmental Investigation Summary Report* (Report) from SME on behalf of the Greenfield Dump. The Report contains 2020 and 2021 environmental investigative information to prepare for waste excavation and future construction of infrastructure for the adjacent wastewater treatment plant. The Report includes results from a geophysical survey, an environmental records review, and a pump test, in addition to soil, waste, and groundwater samples collected from borings and test pits. The following observations are the result of our review.

The waste and groundwater investigation identified VOCs, SVOCs, RCRA metals, PCBs, and dioxins as constituents of concern, due to their presence in waste and groundwater at concentrations that exceed regulatory levels. In addition, the investigative data suggest the following:

- (1) VOCs detected in groundwater appear associated with the area southeast of the maintenance building.
- (2) Groundwater samples with elevated total arsenic and total lead did not contain detectable concentrations of dissolved arsenic and dissolved lead. As a result, total arsenic and total lead concentrations in groundwater samples may be attributable to total solids/sediment in the sample.
- (3) Some groundwater samples contain elevated concentrations of municipal solid waste leachate parameters, such as iron, manganese, ammonia, chloride.

The future landfill Closure Plan, as requested in Item C1 in our letter, dated June 11, 2021 (VFC # 83167654), will address the findings in the February 2022 Report with additional waste boundary delineation, landfill cover, and a groundwater monitoring well network. The Closure Plan is currently under development with SME. Although IDEM

requested submittal of a Closure Plan by December 31, 2021, the Report proposes to submit quarterly status updates regarding the Closure Plan development and submittal, as redevelopment activities proceed. This is acceptable.

Report pages pdf 413 through 416 appear to show the original, historical Greenfield Dump, which is already present in the oldest photograph, dated 1948. This historical dump precedes the current waste areas discussed in the Report and is on the same parcel as the Greenfield WWTP and the adjacent, more recent dump. Please include the original, historical dump in the requirements for the future closure report. The historical dump appears to be a shooting range and had a private well, regulated through our Office of Water, with PWSID 2300917, but connected to City drinking water in 2009.

Thank you for your attention to this matter. If you have questions, please contact Ms. Kim Vedder of my staff at kvedder@idem.IN.gov or call (317) 232-8714.

Sincerely,

John A. Guerrettaz, LPG Chief, Geology Section

Permits Branch

Office of Land Quality

cc: Hancock County Health Department
Hancock County Solid Waste Management District
Mr. Rob Walker, SME
Ms. Natalie Stoflet, SME