



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

February 15, 2022

## VIA EMAIL

Jamieson Schiff  
Textron, Inc.  
40 Westminster Street  
Providence, Rhode Island 02903  
Email: [jschiff@textron.com](mailto:jschiff@textron.com)

Dear Mr. Schiff:

### Re: **Remediation Completion Report**

Torx Facility  
4366 North Old US Highway 31  
Rochester, Fulton County  
State Cleanup Site #7100149

The Indiana Department of Environmental Management (IDEM) has reviewed the *Remediation Completion Report* (RCR), dated September 7, 2021. The RCR was prepared and submitted by Wood Environment & Infrastructure Solutions, Inc. (Wood). The RCR was submitted in response to a release of hazardous substances at the Torx Facility located at 4366 North Old US Highway 31, Rochester, Fulton County, Indiana (Site). The RCR is available in IDEM's Virtual File Cabinet (VFC) as document number [83214486](#). The VFC is located on IDEM's website at <https://vfc.idem.in.gov/DocumentSearch.aspx>.

The RCR 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 groundwater contaminant plume appears to be stable. The in-situ chemical injections continue to reduce groundwater contaminant concentrations, with few exceptions in isolated areas. Comments listed below must be addressed in a document or response, submitted to IDEM for review:

### Comments

1. Review of the qualitative groundwater analytical data indicates an overall pattern of decreasing to no apparent trends in contaminant concentrations following the final in-situ injection event of 2017. However, there are a few exceptions, i.e., vinyl chloride concentrations in monitoring well MW-17, as well as isolated areas where chlorinated volatile organic compound (cVOC) concentrations remain above applicable screening levels.

2. Figures illustrating the horizontal and vertical extents of contamination above applicable screening levels for all impacted media must be provided for review, per RCG Section 3.11.
3. The proposed continued annual groundwater monitoring and reporting to evaluate groundwater contaminant plume behavior and the need for continued environmental restrictive covenants (ERCs) is acceptable. However, in addition to sampling of the proposed 41 groundwater monitoring wells, groundwater monitoring wells MW-21 (40.2), MW-27 (nested), and MW-57 (38) must be added to the groundwater monitoring well sampling network. Each annual groundwater monitoring event must take place in a specific quarter, ideally the same quarter each year. The report documenting the activities of each annual groundwater monitoring event must be submitted within 60 days following completion of each event.

## Conclusions

Groundwater contaminant concentrations continue to decrease following the final in-situ chemical injection event of 2017. Subsequent monitoring activities have indicated the groundwater contaminant plume is decreasing and stable. The proposed evaluation of the groundwater contaminant plume by collecting groundwater samples and reporting annually is acceptable. Annual groundwater monitoring activities are required to be documented in a report and submitted to IDEM for review. The annual groundwater monitoring events and subsequent reports must be conducted and submitted in one specific quarter for each annual event. Closure for the Site will be granted following discontinuation of annual groundwater monitoring and reporting and proper abandonment of the groundwater monitoring well network and chemical injection locations.

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit a response to the comments listed above to IDEM within 60 days of the date of this letter.

To reduce paper usage, reports 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) 232-8838, [jkeller@idem.in.gov](mailto:jkeller@idem.in.gov), or you may call IDEM's toll free number at (800) 451-6027 and ask for Josh Keller.

Sincerely,



Josh Keller  
State Cleanup Section  
Office of Land Quality

JK:CP

ec: IDEM Site #7100149

Paul Stork, Wood, email: [paul.stork@woodplc.com](mailto:paul.stork@woodplc.com)

Fulton County Health Department, email: [sshepherdchd@rtcol.com](mailto:sshepherdchd@rtcol.com)

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).