



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO ATTENTION OF:
SE-5J

March 16, 2015

Rex A. Osborn, Chief
Federal Programs Section
Office of Land Quality
Indiana Department of Environmental Management
100 N. Senate Ave.
Indianapolis, IN 46204

RE: Request for State Applicable and Relevant and Appropriate Requirements
(ARARs) for Town of Pines Arsenic Site, Pines, Porter County, Indiana

Dear Mr. Osborn:

This letter requests that the Indiana Department of Environmental Management (IDEM) identify all Applicable, Relevant, and Appropriate Requirements (ARARs) for the potential upcoming removal action at the Town of Pines Arsenic Site in Pines, Indiana. Any State ARARs identified in a timely manner for this removal action will be complied with to the extent practicable.

Based on the soil sampling data collected by NIPSCO as a part of the RI/FS process for Town of Pines Groundwater Plume Superfund Alternative site, five residential properties have elevated levels of Arsenic and Thallium above USEPA's Removal Management Level (RML).

U.S. EPA is in the process of preparing an Enforcement Action Memorandum to oversee the Time Critical Removal Actions performed by NIPSCO within the Town of Pines Arsenic Site in Pines, Indiana. U.S. EPA has determined that the removal action will include:

- 1) Develop and implement Site planning documents (e.g. Health and Safety Plan, Arsenic-Contaminated Soil Work Plan, Sampling and Analysis Plan, Site Security Plan, Air Monitoring Plan, Traffic Management Plan), decontamination procedures, and necessary staging/support areas;
- 2) Conduct land surveying to the extent necessary to establish a grid system to locate all property boundaries, special features (pipes, storage tanks, etc.), and sample locations;

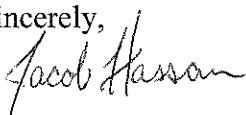
- 3) Based upon soil results, remove, transport and dispose of all characterized or identified hazardous substances, pollutants, wastes or contaminants at a RCRA/CERCLA approved disposal facility in accordance with the U.S. EPA off-site rule;
- 4) The soil clean-up criterion is 67 mg/kg lead unless analyses indicate the existence of additional contaminants, hazardous substances, pollutants or waste;
- 5) Backfill excavated areas with clean material and topsoil with seeding as needed;
- 6) Ensure that restoration and re-vegetation occurs, and
- 7) Take any necessary response action to address any site related release or threatened release of a hazardous substance, pollutant, or contaminant that the U.S. EPA determines may pose an imminent and substantial endangerment to the public health or the environment.

Subsequent to the completion of the proposed time-critical removal action, Region 5 will evaluate any residual risk to human health and the environment based on visual observation and confirmation sampling results. This information will be shared with U.S. EPA Region 5 Remedial Project Manager, Erik Hardin, and IDEM for further evaluation.

The Work Plan documents may specify other project requirements to be completed as part of this removal action.

If you have any questions regarding this letter, please feel free to contact me at 312-886-6864. Thank you for your assistance in this matter.

Sincerely,



Jacob Hassan
USEPA On-Scene Coordinator

cc: Charlie Gebien, USEPA, SE-5J
Terry Branigan, USEPA C-14J
Doug Petroff, IDEM