

**SIXTH FIVE-YEAR REVIEW REPORT  
FOR  
MAIN STREET WELL FIELD SUPERFUND SITE  
ELKHART COUNTY, INDIANA**



**Prepared by**

**U.S. Environmental Protection Agency  
Region 5  
Chicago, Illinois**

6/16/2022

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## LIST OF ABBREVIATIONS & ACRONYMS

ARAR	Applicable or Relevant and Appropriate Requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
COCs	Contaminants of Concern
EPA	United States Environmental Protection Agency
EPC	Elkhart Products Corporation
ESD	Explanation of Significant Differences
FYR	Five-Year Review
GMWs	Groundwater Monitoring Wells
ICs	Institutional Controls
ICIAP	Institutional Control Implementation and Assurance Plan
IDEM	Indiana Department of Environmental Management
MCLs	Maximum Contaminant Levels
µg/kg	Microgram per Kilogram
µg/L	Microgram per Liter
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
O&M	Operation and Maintenance
OU	Operable Unit
PCE	Tetrachloroethene
PRP	Potentially Responsible Party
RAOs	Remedial Action Objectives
RI	Remedial Investigation
ROD	Record of Decision
RPM	Remedial Project Manager
Site	Main Street Well Field Superfund Site
SVE	Soil Vapor Extraction
TCE	Trichloroethene
UAO	Unilateral Administrative Order
UU/UE	Unlimited Use and Unrestricted Exposure
VISL	Vapor Intrusion Screening Level
VOC	Volatile Organic Compound
MW	Monitoring Well

## **I. INTRODUCTION**

The purpose of a Five-Year Review (FYR) is to evaluate the implementation and performance of a remedy in order to determine if the remedy is and will continue to be protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in FYR reports such as this one. In addition, FYR reports identify issues found during the reviews, if any, and document recommendations to address them.

The United States Environmental Protection Agency (EPA) is preparing this FYR pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121, consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR Section 300.430(f)(4)(ii)) and considering EPA policy.

This is the sixth FYR for the Main Street Well Field Superfund Site (“Site”). The triggering action for this statutory review is the completion date of the previous FYR. The FYR has been prepared because hazardous substances, pollutants, or contaminants remain at the Site above levels that allow for unlimited use and unrestricted exposure (UU/UE).

The Site consists of two (2) operable units (OUs), which encompass the entire Site, and are addressed in this FYR. OU1 addresses providing an alternate water supply system. OU2 addresses the removal of a paint layer from contaminated soils on the East Side, groundwater monitoring of specified wells, the installation of an in-situ soil vapor extraction (SVE) system, the installation of interceptor wells on the West Side, and continued operation and maintenance (O&M) of the OU1 remedy.

The Main Street Well Field Superfund Site FYR was led by L. Hill, Remedial Project Manager (RPM) for EPA. Justin Hodgson, project manager for the Indiana Department of Environmental Management (IDEM), also participated in the review. The review began on March 29, 2021. The potentially responsible parties (PRPs) were notified of the initiation of the FYR.

### **Site Background**

#### **Site Location & Physical Characteristics**

The Site is located at 942 North Main Street in the City of Elkhart, Indiana. The Site consists of the well field, which includes approximately 48 acres of property. The Site is bordered on the north, south, and west by residential areas. Industrial and commercial facilities border the Site on the northeast, east, and southwest. There are unknown businesses located to the east and west of the well field which contribute to the groundwater plume. Christina Creek enters the Site at the northwestern corner and flows through the Site where it is diverted into recharge ponds. The creek exits the Site on the southeast side and discharges to the St. Joseph River. Groundwater is uncontaminated upgradient of Elkhart Products Corporation on the West Side and upgradient of the former Excel Corporation (Excel) on the East Side. South of these locations, groundwater is contaminated.

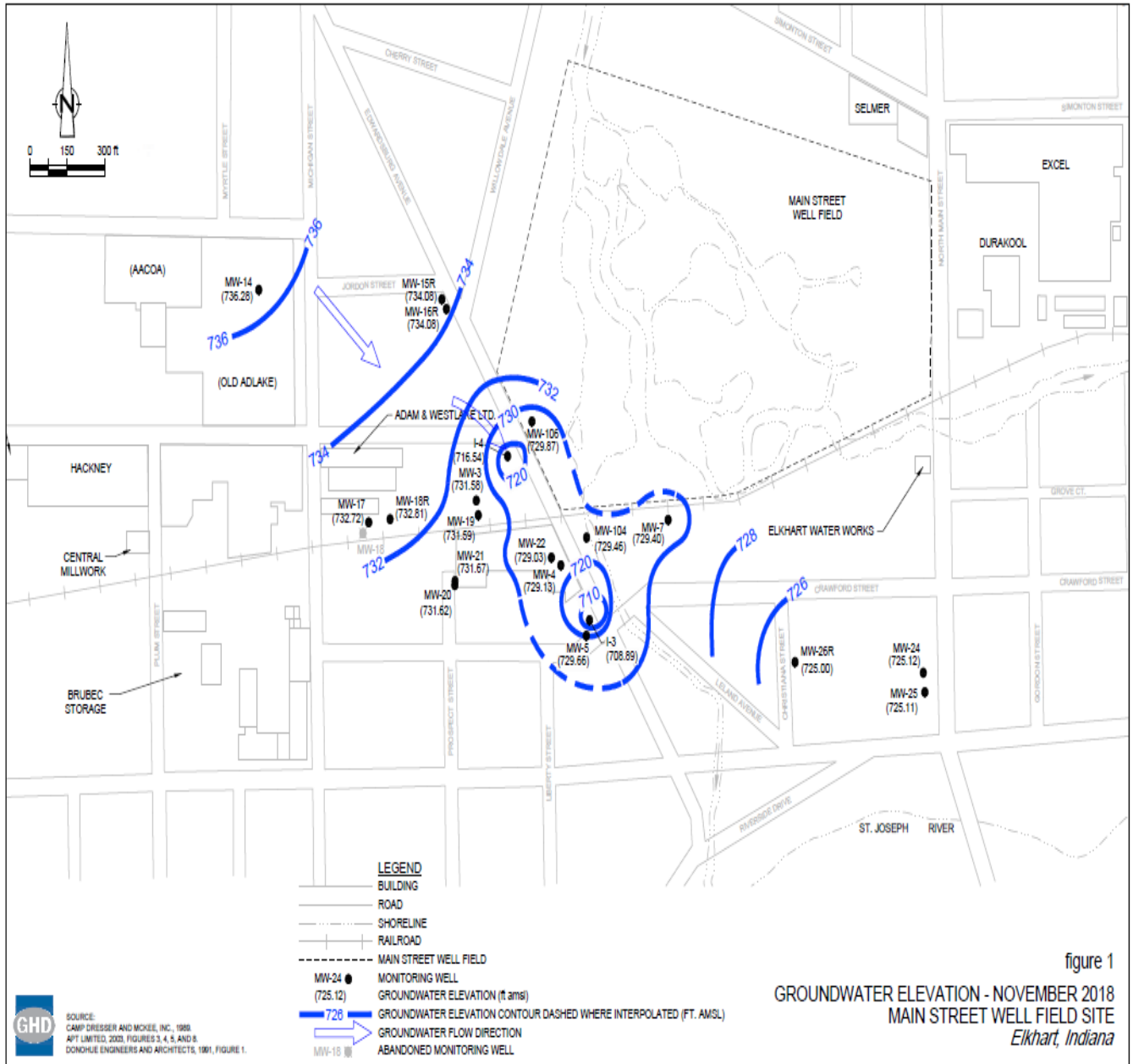
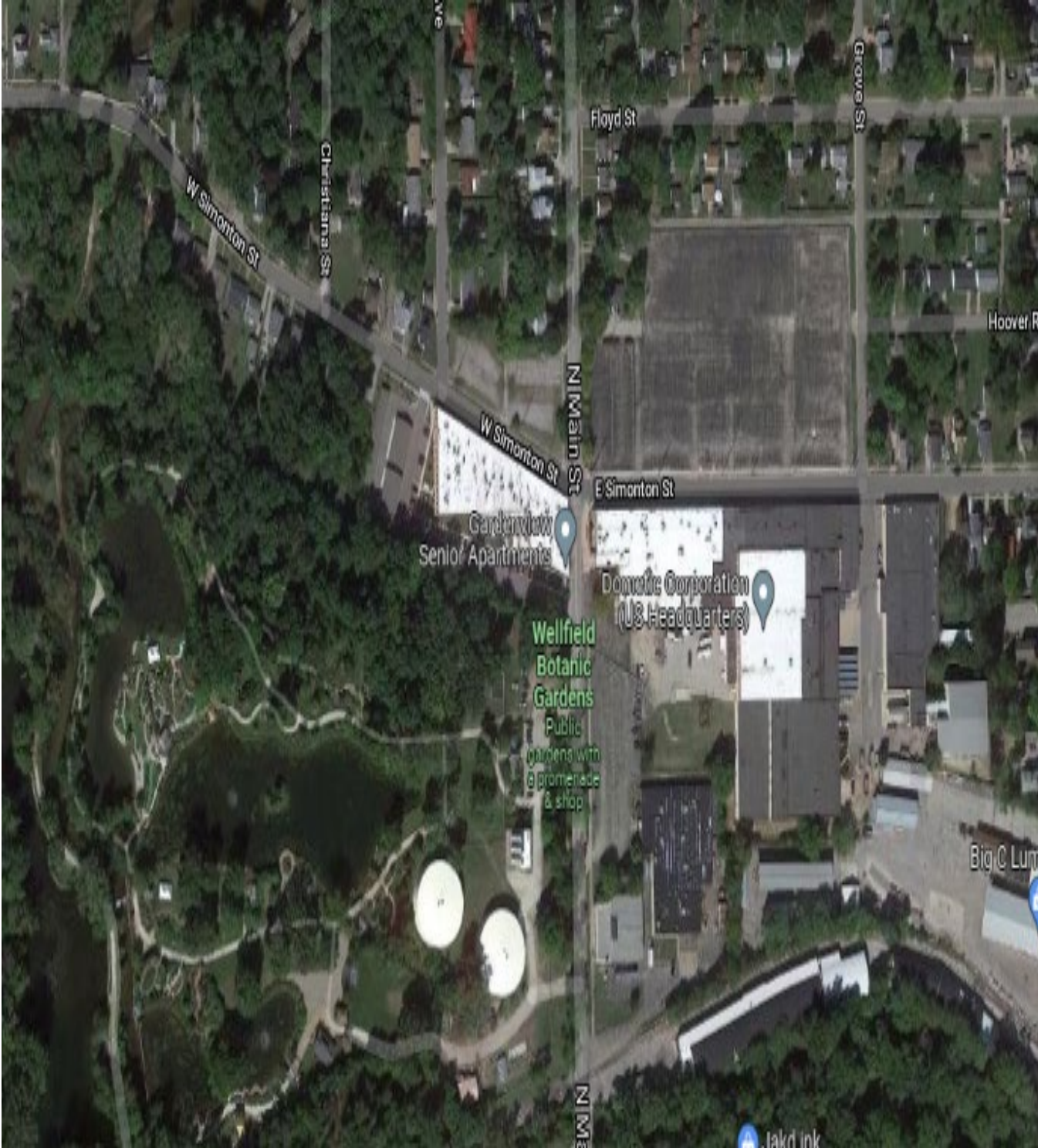
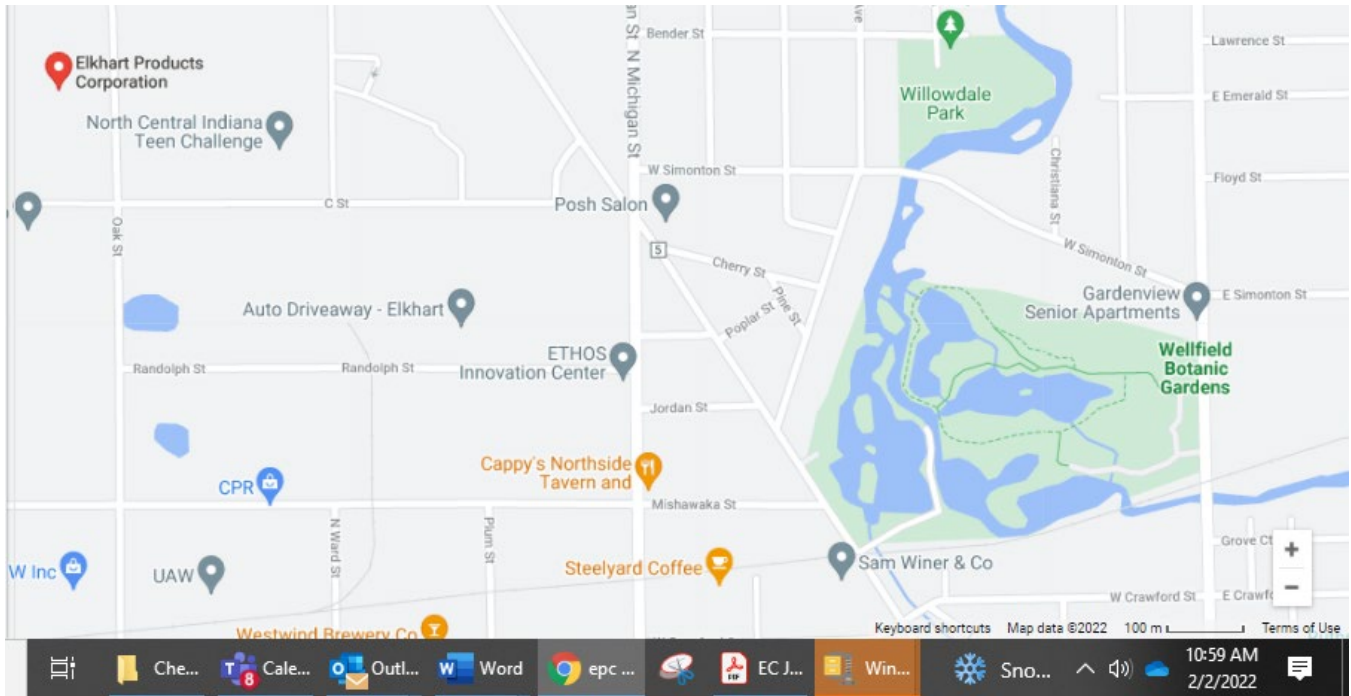


Figure 2. Main Street Well Field Site Aerial View





**Figure 3. Map View of Site**

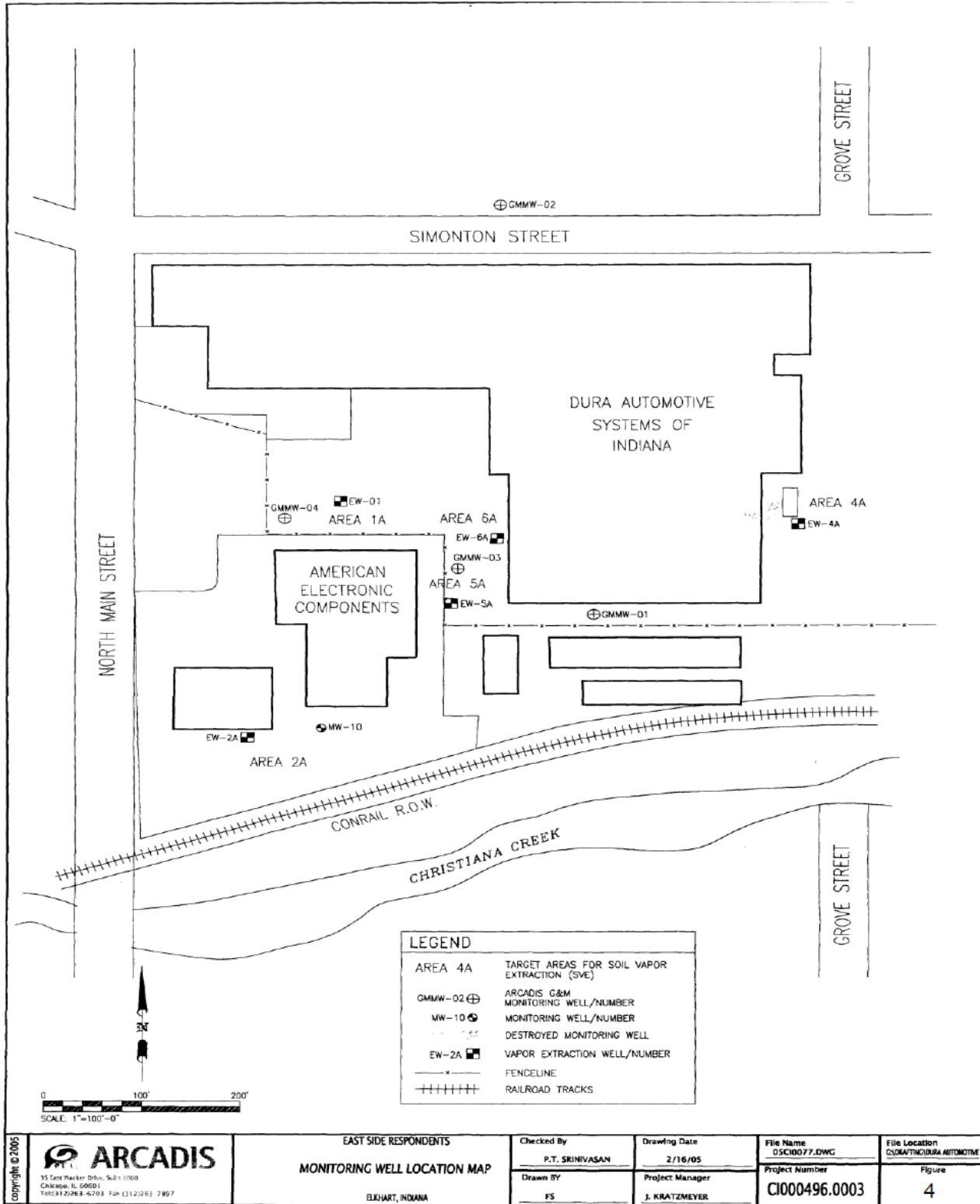


### **Historical Practices Resulting in Contamination**

The first known incident of groundwater contamination at the Site was in the mid-1950's. Groundwater was contaminated with phenols as a result of releases from a fuel tank farm east of the well field.

Two companies operating on the East Side of the well field had been present since the 1920s and 1930s. Excel manufactured automobile and truck sash and window assemblies. Durakool, Inc. (Durakool) manufactured relay and tilt switches. Both industries used trichloroethene (TCE) and other chlorinated solvents for degreasing in their processes. In 1983, Excel and Durakool retained a consultant to conduct a voluntary investigation of their properties. TCE concentrations in soil on the Excel property ranged from 0 to 570,000 ppb. On the Durakool property, concentrations ranged from 0 to 5,000 ppb. Figure 4 below shows the East Side facilities. Note that the building labeled “Dura Automotive Systems of Indiana” was the former Excel location, and the building labeled “American Electronic Components” was the former Durakool facility.

Figure 4. East Side Properties



The West Side of the well field was highly industrial in nature with numerous companies utilizing chlorinated solvents such as TCE in their process operations. Investigations of likely sources of contamination suggested that one source of TCE contaminated groundwater was west of the



Miles Laboratory facility (at Elkhart Products Corporation). Soil sampling and removal of contaminated soil was conducted by Miles Laboratory between 1984 and 1985 after exposing underground degreasing tanks during demolition of old buildings on the old Adams & Westlake property which it had purchased. Miles removed over 900 yards of soil containing TCE and 1,1,1-trichloroethane.

TCE contamination of the groundwater was discovered on another part of the Miles Laboratory property in 1984. Investigations into the likely source of contamination suggested that the source of the TCE contaminated groundwater was west of Miles (at Elkhart Products). TCE was reportedly not used by Miles at this facility. In 1985, an additional release involving 180 gallons of methylene chloride, ethyl alcohol, and acetone occurred at the Miles Laboratory facility. Contaminated soil was removed, and groundwater was recovered.

TCE spill events also occurred at the Elkhart Products Corporation (EPC). EPC is a manufacturer of copper fittings and custom fabricated tubular products. EPC investigated their own property from August 1985 through February 1986. EPC installed a vapor extraction system to treat contaminated soil and installed an air stripper system to treat contaminated groundwater related to its site.

## **Current and Future Land and Resource Use**

### Land Use

The West Side of the Site consists of businesses and residential properties. The City of Elkhart redeveloped the area along the West Side of the Site into the Wellfield Botanic Gardens Shoreline Habitat Restoration Project. The Wellfield Botanic Gardens is an environmental project which establishes a buffer zone between land and water using native plants while providing a natural habitat for ducks, geese, birds, and other wildlife. The Botanic Gardens are landscaped throughout with plants, pavers, stones, waterfalls, and walking trails. The East Side of the Site consists of the former Durakool and Excel properties and other businesses.

The future land use of the West Side of the Site is anticipated to remain the same since it incorporates the City's well field and botanic gardens. The future land use of the East Side of the Site is assumed to remain as a commercial/industrial area.

### Hydrogeology

Near the Site, there is a coarse sand and gravel unconfined aquifer system ranging from about 140 to 215 feet in thickness. Within the Site area, glacial outwash occurs at depths ranging from 42 to 58 feet. Regionally, below the outwash is a gray and hard to very dense silty clay layer which separates the unconfined aquifer from a deeper aquifer. The lower aquifer ranges from 0 to 120 feet thick within the city boundaries. The confining layer is at least 10 to 160 feet thick. The lower aquifer appears to be absent under the Main Street Well Field Site. Beneath the lower aquifer lies the Devonian and Mississippian shale bedrock.

The regional aquifer is part of a designated sole source aquifer. The direction of the regional groundwater flow is generally south, toward the St. Joseph River and its tributary, Christiana Creek. This southerly flow is more predominant east of the well field. In the area west of the well

field, the groundwater tends to flow from northwest to southeast toward the well field. The groundwater flow in this area is influenced by natural factors such as Christiana Creek and by groundwater pumping and recharge. The effect of Main Street Well Field on groundwater flow patterns is dependent upon the following: groundwater levels; the number of wells; the location of wells; the rate of pumping of the supply wells; the recharge from Christiana Creek; and other industrial groundwater use and recharge in the area.

**FIVE-YEAR REVIEW SUMMARY FORM**

<b>SITE IDENTIFICATION</b>		
<b>Site Name:</b> Main Street Well Field		
<b>EPA ID:</b> IND980794358		
<b>Region:</b> 5	<b>State:</b> IN	<b>City/County:</b> Elkhart/Elkhart
<b>SITE STATUS</b>		
<b>NPL Status:</b> Final		
<b>Multiple OUs?</b> Yes	<b>Has the site achieved construction completion?</b> Yes	
<b>REVIEW STATUS</b>		
<b>Lead agency:</b> EPA <i>[If "Other Federal Agency", enter Agency name]:</i>		
<b>Author name (Federal or State Project Manager):</b> L. Hill		
<b>Author affiliation:</b> EPA		
<b>Review period:</b> 3/29/2021 - 2/18/2022		
<b>Date of site inspection:</b> The FYR Site inspection was not conducted due to work travel restrictions related to the COVID-19 pandemic.		
<b>Type of review:</b> Statutory		
<b>Review number:</b> 6		
<b>Triggering action date:</b> 6/20/2017		
<b>Due date (five years after triggering action date):</b> 6/20/2022		

## II. RESPONSE ACTION SUMMARY

### Basis for Taking Action

Numerous private and governmental groundwater investigations including human risk assessments indicated that hazardous organic substances were detected in the groundwater at the Site above Federal and/or State drinking water standards. Among these hazardous substances were TCE, vinyl chloride, and tetrachloroethene (PCE). Other hazardous substances such as xylenes, lead, and TCE were detected in a residual paint layer in surface soils on the eastern side of the Site. The Remedial Investigation (RI) (Camp Dresser & McKee, May 1989) and the risk assessment for the site (Life Systems Inc., December 18, 1990) identified the following exposure routes at the Site that could present unacceptable risks to human health and the environment: exposure to contaminated groundwater via ingestion, dermal absorption from bathing, and inhalation of vapor from contaminated water during bathing or other uses by residential users. Exposure to contaminated soil and volatile air emissions during worker landscaping and maintenance were determined to be the greatest risk from April to October when the ground is neither frozen nor snow covered. (Donohue, January 1991).

Environmental receptors are thought to be Christiana Creek and the St. Joseph River. The recharge ponds are not considered a significant environmental receptor of contaminated groundwater due to the hydrologic relationship between the ponds and the groundwater in that the gradient is from the ponds to the groundwater, reversal is not likely. In addition, the ponds are dredged every 2 years to ensure maximum infiltration rates. Samples taken from surface water and sediment within the well field showed no volatile organic compounds (VOCs).

The RI report (Camp Dresser & McKee, May 1989) and the Feasibility Study for Soil Remediation (Geraghty & Miller, Inc., February 1991), identified the following major contaminants of concern (COCs) at the Site as shown in Table 1 below.

<b>Table 1. Main Street Well Field Site COCs</b>			
<b>Groundwater (West Side)</b>	<b>Groundwater (East Side)</b>	<b>Soil (East Side)</b>	
TCE	TCE	TCE	
PCE	PCE	-	
Vinyl Chloride	Vinyl Chloride	-	
1,1,1 -trichloroethane	1,1,1 -trichloroethane	-	
trans-1,2-dichloroethene	1,2- dichloroethene	-	
cis-1,2-dichloroethene	1,1,2- trichloroethane	-	
Arsenic	Toluene	-	
Barium		-	
Chloroform		-	
Cyanide		-	

Although not noted as COCs for the Site, other hazardous substances such as xylenes and lead, were detected in a residual paint layer in surface soils on the East Side of the Site.

## **Response Actions**

### Initial Response

The groundwater contamination resulting from the releases from a fuel tank farm east of the Site during the 1950's was addressed by excavating six recharge ponds in the well field and diverting water to the ponds from Christiana Creek. Also, the Elkhart Water Works acquired the water rights to the Christiana Creek from the Indiana-Michigan state line to the Main Street Well Field.

In 1981, EPA conducted a national groundwater supply survey. The well field was found to be contaminated as follows: TCE (94 µg/L); 1,2-dichloroethene (33 µg/L); 1,1,1-trichloroethane (5 µg/L); and 1,1-dichloroethene (2 µg/L). In response to this survey, the City of Elkhart performed remedial activities which resulted in a temporary decrease in concentrations of VOCs in the well field. These remedial activities by the City included the following:

1. Installation of observation wells for the purpose of monitoring groundwater near and on Excel and Durakool properties on the East Side of the well field;
2. Construction of two interceptor wells (in 1982) to prevent contaminated groundwater from entering the well field; and
3. Shutting down highly contaminated production wells near the interceptor wells.

### Record of Decision

#### Operable Unit #1

The Record of Decision (ROD) for OU1 was signed on August 2, 1985 (EPA, 1985). The 1985 ROD for OU1 didn't identify Remedial Action Objectives (RAOs) by name, but the objectives for the work were noted in two locations. On page 8 of the ROD, it is stated that "*The objective of this action is to provide those consumers currently dependent on Main Street Well Field for drinking water with a reliable supply of safe, potable water until the final remedial measure(s) may be implemented.*" Additionally, on page 20, it's stated that, "*The primary objective of the Main Street Well Field operable unit is to protect public health by providing a reliable supply of safe, potable water to those consumers currently dependent on the Main Street Well Field. The long-term remedial measures will likely include minimizing and mitigating groundwater contamination affecting Main Street Well Field.*"

These objectives were to be accomplished by the following remedial actions selected in the 1985 ROD:

- Providing an alternate water supply to the City of Elkhart;
- Installation of an air stripper treatment system to remove VOCs from the contaminated Main Street Well Field with treated water to be discharged to the existing water treatment plant and distribution system;

- Installation of two (2) interceptor wells; and
- Reconfiguration of production well flows.

### Operable Unit #2

A ROD for OU2 was signed on March 29, 1991 (EPA, 1991). The purpose of the 1991 ROD was to provide remediation of the soil and groundwater contamination on the East Side of the well field and to provide the restoration of the well field by intercepting the plume from undefined sources on the West Side of the well field. The 1991 ROD identified the following RAOs for the selected remedy in this ROD:

- Continue to provide a safe source of drinking water through ongoing use of the air stripper;
- Control migration of contaminated groundwater to the well field to minimize existing groundwater contamination within the well field;
- Minimize risk to human health and the environment from direct contact with contaminated soil; and
- Reduce migration of soil contaminants to the groundwater in areas of known contamination.

### **West Side PRPs**

The 1991 ROD for OU2 required a group of PRPs located on the West Side of the well field (West Side PRPs) to perform the following selected remedies:

- Install additional interceptor wells on the West Side of the well field to prevent plume migration into the well field and to provide well field restoration;
- Implement a groundwater monitoring program to detect changes in the chemical concentrations, direction, and rate of groundwater flow at and adjacent to the West Side PRPs' property;
- Perform groundwater monitoring of specified monitoring, interceptor, and production wells to ensure standards are met and maintained; and
- Continue O&M of the air stripper, interceptor wells and all associated parts of the system.

### **East Side PRPs**

The 1991 ROD for OU2 required a second group of PRPs located on the East Side of the well field (East Side PRPs) (Excel Corporation and Durakool) to perform the following:

- Implementation of a groundwater monitoring program to detect changes in the chemical concentrations, direction, and rate of groundwater flow at and adjacent to the East Side PRPs' property;
- Performance of groundwater monitoring of specified monitoring, interceptor, and production wells to ensure standards are met and maintained;

- Delineation of the extent of the VOC contamination in the soils;
- Design, construction, and operation of an in-situ SVE system to remove VOCs from contaminated soils;
- Removal and off-site disposal of the paint residue layer and areas of soil exceeding cleanup standards;
- Continued O&M of the existing air stripper, interceptor wells, and all associated parts of the system; and
- Implementation of enforceable deed restrictions on East Side property with contaminated soil to prevent use of the groundwater beneath the Excel Corporation and Durakool properties until soil and groundwater cleanup goals are met and sustained.

Cleanup standards for the soil, groundwater and air on the East Side were selected at a  $1 \times 10^{-5}$  level based on potential future use. Table 2 provides the groundwater cleanup standards for the East Side.

<b>Table 2. Cleanup Standards for East Side Groundwater</b>	
Contaminants	Cleanup Standard
TCE	1.0 ppb
PCE	0.6 ppb
Vinyl Chloride	0.3 ppb

The 1991 ROD required that the paint layer soil cleanup, on the East Side for the industrial property, achieve 100 ppb (or better) of TCE.

The 1991 ROD states that the West Side interceptors must continue to operate until the plume entering the well field from the west no longer poses a cumulative contaminant risk of greater than  $1 \times 10^{-6}$ . Contaminant-specific standards were not established.

### **Explanation Of Significant Differences**

On May 29, 2020, EPA issued an Explanation of Significant Differences (ESD) for the Site (EPA, 2020). The purpose of the ESD is to document an interim decision to change the required Institutional Control (IC) for the Site East Side properties from deed restrictions to the 2017 Elkhart County Private Water Well Ordinance and to require this IC on the Site West Side properties. The IC is an interim measure, required only until such time that the contaminated soil and groundwater on the East Side properties, and the contaminated groundwater on West Side properties, achieve and sustain cleanup goals. Specifically, the Elkhart County Private Water Well Ordinance 2017-24 is to generally restrict new drinking water well installation at the Site in areas of known groundwater contamination.



## **Status of Implementation**

OU1 was implemented by providing an alternate water supply to the City of Elkhart which entailed installing 2 interceptor wells (I-1 and I-2) on the East Side of the Site, reconfiguring production well flows, and installing an air stripper treatment system. Seven production wells plus the two East Side interceptor wells were piped to the air stripping units. The air stripper treatment system went on-line in September 1997 with a capacity of 6.45 million gallons per day.

A unilateral administrative order (UAO) was issued to the East and West Side PRPs in January 1992 and became effective on February 20, 1992. (EPA, 1992). The UAO transferred financial responsibility for the O&M of the air stripper to the East and West Side PRPs. On October 20, 1992, the East Side PRPs excavated and removed the contaminant paint layer soil. Upon examination of these soils, the PRPs determined that the soils should be returned to the original excavation pit for in-place treatment utilizing the SVE system. EPA approved this change to the remedy in a letter to the PRP contractor, Geraghty & Miller, dated April 8, 1993 (Geraghty & Miller, August 1993). EPA approved the final remedial design report for the SVE system on September 30, 1993. (EPA, 1993). The remedial action construction activities commenced in October 1993. Construction of the SVE system was completed in January 1994, and full-scale operation of the system began in February 1994. EPA and the State determined that all remedial action construction activities were performed in accordance with specifications, and the Site achieved construction completion status. A Preliminary Close Out Report was signed on September 28, 1995 (EPA, 1995). This close out report documented that a final inspection of the constructed remedial action occurred on January 3, 1994, and the following activities were completed: removal of the East Side contaminated paint layer soil; installation of the SVE system; installation of monitoring wells; and implementation of deed restrictions at Excel.

During this review period, O&M activities were performed for the West Side remedial components. The West Side PRPs continued to submit groundwater monitoring reports and conduct visual inspections/repairs of monitoring wells.

The East Side SVE system has been shut down since 2002 because the soil cleanup goals were achieved. The two East Side PRPs filed for bankruptcy in 2006 and since then have failed to further comply with the O&M requirements (groundwater monitoring/reporting) from the 1991 ROD or the UAO for the monitoring wells located on the East Side properties. Presently, no one is performing the O&M requirements (groundwater monitoring/reporting) for the East Side property wells on behalf of the East Side PRPs. The City of Elkhart operates and maintains, among other things, the air stripper system, and the City samples interceptor wells and influent/effluent streams. The West Side PRPs have reimbursed the City of Elkhart for the cost of operating and maintaining the groundwater system, but the East Side PRPs have not reimbursed the City of Elkhart for its efforts since filing bankruptcy.

## **Institutional Controls**

ICs are required by the decision documents to assure long-term protectiveness for those areas that do not allow for UU/UE. A summary of the implemented and planned ICs for the Site is listed in Table 3 and are further discussed below.

**Table 3. Summary of Planned and/or Implemented ICs**

Media, engineered controls, and areas that do not support UU/UE based on current conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Former Excel Property (East Side) – Soil treated to industrial cleanup standards	Yes	Yes	Former Excel Property	Prohibit residential or recreational use and prohibit interference with the remedy	“Land Use Restrictions”, recorded in the Elkhart County Recorder’s Office, August 1992.
Former Durakool Property (East Side) – Groundwater	Yes	Yes	Former Durakool Property	Prohibit groundwater consumption or other use	Restrictive Covenant; Deed Notice (planned; under discussion)
Private Water Wells (Contaminated Groundwater)	Yes	Yes	Elkhart County and near Site	Prohibit the installation of new wells	Elkhart County Private Water Well Ordinance, Ordinance No. 2017-24, Section 5.G., September 28, 2017

Elkhart County Private Water Well Ordinance, Ordinance No. 2017-24, regulates the private water wells in Elkhart County, Indiana, providing that all new private water wells constructed in Elkhart County meet minimally acceptable standards for siting, construction, and potability and assuring that abandoned private water wells do not adversely affect aquifers from which water is drawn. Specifically, the Ordinance requires, among other things, that new private water well construction and installation shall generally be prohibited in areas of known groundwater contamination, such as those designated by the EPA or an agency of the State of Indiana, including but not limited to Superfund Sites, Environmental Restrictive Covenant Sites, and other groundwater use restriction sites.

A map which depicts the current conditions of the Site and areas which do not allow for UU/UE and need ICs is provided in Appendix B, Institutional Controls Map for Main Street Well Field Site Elkhart, Indiana.

Current Compliance: Land use restrictions have been implemented at the former Excel property but have not been implemented at the former Durakool property on the East Side. Per the 2020 ESD, the Site restricts the installation of new potable well sources in areas of known groundwater

contamination, pursuant to the City of Elkhart's groundwater ordinance. A FYR Site inspection by EPA during this FYR period to verify the Site conditions since the last review could not be conducted due to COVID-19 travel restrictions.

A review of the Indiana Department of Natural Resources Water Well Viewer shows a possible private well on the West Side. The well pre-dates the 2017 Elkhart County Ordinance, but the status of the well and its use are not known. During this 2022 FYR period, the City of Elkhart confirmed that no new groundwater sources or uses were installed on the West Side property that would adversely impact the integrity of the remedy. EPA will need to determine whether the new County Ordinance is effective with respect to the Site. Therefore, EPA will perform a well survey to investigate whether any private wells in the area are being used for potable use and to verify that no new wells were installed since the last Site inspection and since the implementation of the 2017 Elkhart County Ordinance and the 2020 ESD.

IC Follow up Actions Needed: An Institutional Control Implementation and Assurance Plan (ICIAP) will be completed for the Site, which will include plans for exploring implementation of the environmental restrictive covenants and will include procedures for ensuring IC compliance at the Site. The purpose of the ICIAP is to document IC evaluation activities that will be conducted to ensure that the implemented ICs remain effective, to explore whether additional ICs such as environmental restrictive covenants are needed, and to ensure that long-term stewardship procedures are in place so that ICs are properly maintained, monitored, and enforced. Further, the ICIAP will include long-term stewardship procedures, such as regular inspection of the engineering and access controls, review of the ICs, and submittal of an annual IC report with review of and certification that ICs are in place and effective. The ICIAP will also include a schedule for additional IC evaluation activities such as updating the map of restricted areas, if needed, and title work to assure that recorded encumbrances will not interfere with restrictions. In addition, the ICIAP will evaluate updating the existing land use restriction IC on the Excel property to benefit from the Indiana Code provisions for environmental restrictive covenants. An environmental restrictive covenant is also needed at the former Durakool property on the East Side because monitoring wells remain on-Site.

### **Systems Operations/Operation & Maintenance**

There have been no updates to the O&M plans for the Site. During this review period, O&M activities were performed for the West Side remedial components. The West Side PRPs submitted groundwater monitoring reports and conducted visual inspections/repairs of monitoring wells for the period of 2017, 2018, and 2020. In 2019, the West Side's Respondents Group submitted the Proposed Groundwater Monitoring Program Optimization report, dated September 17, 2019, to EPA. This report proposed, among other things, biennial groundwater sampling for the West Side. EPA is still evaluating the PRPs' request but will submit a response to the PRPs once the 2022 sampling report is completed. The West Side PRPs failed to submit monitoring reports for 2019 and 2021. In January 2022, EPA contacted the West Side PRP contractor to discuss the lack of groundwater sampling in 2019 and 2021. The PRP contractor stated that the PRPs implemented biennial sampling and did not conduct groundwater sampling in 2019 and 2021. EPA informed the PRP contractor that the EPA had not granted approval to modify the West Side groundwater monitoring request. Also, EPA informed the PRP contractor that annual sampling should continue. The PRP contractor agreed to continue annual sampling

on the next sampling event in 2022.

The East Side PRPs filed for bankruptcy in 2006 and failed to further comply with the remaining requirements of the 1991 ROD, including O&M activities such as groundwater monitoring and reporting. EPA plans to restart the groundwater monitoring program and to develop ICs on the Durakool property on the East Side of the Site. The State of Indiana will ultimately be responsible for long-term O&M.

### III. PROGRESS SINCE THE LAST REVIEW

This section includes the protectiveness determinations and statements from the last FYR as well as the recommendations from the last FYR and the status of those recommendations.

**Table 4: Protectiveness Determinations/Statements from the 2017 FYR**

OU #	Protectiveness Determination	Protectiveness Statement
1 & 2	Short-term Protective	The remedies at OU #1 and OU #2 currently protect human health and the environment. OU #1 consisted of the installation of an alternate water supply system, an air stripper, and 2 interceptor wells. OU #2 consisted primarily of groundwater monitoring of specified wells, the removal and off-Site disposal of a paint layer from contaminated soils on the East Side, the installation of an in-situ soil vapor extraction system, the installation of interceptor wells, and the continued O&M of OU #1. OUs #1 and 2 are operating as intended by the RODs. Exposure pathways that could result in unacceptable risks are being controlled by preventing exposure to contaminated groundwater. All threats at the Site have been addressed through the installation and operation of interceptor wells, the air stripper, and the soil vapor extraction system. Fencing is located around the remedial action components to prevent the interference with the remedial action. However, in order for the remedy to be protective in the long-term, the following actions need to be taken to ensure protectiveness: ICs are needed on the Durakool property east of the well field; the restrictions that were recorded in 1992 on the Excel Property east of the well field may need to be updated to benefit from the newer Indiana Code provisions for environmental restrictive covenants; an ICIAP should be developed; and long-term stewardship procedures should be developed and implemented.
Sitewide	Short-term Protective	The remedy for the Main Street Well Field site currently protects human health and the environment because it is operating as intended by the RODs and exposure pathways that could result in unacceptable risks are being controlled by preventing exposure to contaminated groundwater. All threats at the Site have been addressed through the installation and operation of interceptor wells, the air stripper, and the soil vapor extraction system. Fencing is located around the remedial action components to prevent the interference with the remedial action. However, in order for the remedy to be protective in the long-term, the following actions need to be taken to ensure protectiveness: ICs are needed on the Durakool property east of the well field; the restrictions that were recorded in 1992 on the Excel Property east of the well field

OU #	Protectiveness Determination	Protectiveness Statement
		may need to be updated to benefit from the newer Indiana Code provisions for environmental restrictive covenants; an ICIAP should be developed; and long-term stewardship procedures should be developed and implemented.

**Table 5: Status of Recommendations from the 2017 FYR**

OU #	Issue	Recommendations	Current Status	Current Implementation Status Description	Completion Date (if applicable)
2	ICs are not implemented on one of the two East Side properties.	Implement ICs on the East Side of the Site. The existing land use restriction may need to be modified to benefit from new restrictive covenant requirements pursuant to the Indiana Code (IC 13-11-2-1953.5(2)).	Ongoing	The East Side PRPs filed for bankruptcy in 2006 and are not complying with the UAO. EPA will facilitate the implementation of ICs on the East Side.	N/A
2	East Side groundwater monitoring and O&M are not being implemented due to the East Side PRPs filing for bankruptcy in 2006.	EPA and IDEM will determine who will continue sampling the East Side monitoring wells.	Completed	The East Side PRPs filed bankruptcy in 2006 and are not complying with the UAO. EPA will restart the O&M and sampling of groundwater on the East Side. The State of Indiana will ultimately be responsible for long-term O&M.	5/9/2022
1, 2	Additional ICs may be needed; long-term stewardship procedures are needed.	Develop an ICIAP whose purpose is to conduct IC evaluation activities to identify the needed ICs, ensure that the implemented ICs are effective, and to ensure that long-term stewardship procedures are developed so that ICs are properly maintained,	Addressed in Next FYR	EPA will retain a contractor to assist in the development and review of an ICIAP that will include long-term stewardship procedures for the East Side.  The West Side PRPs will develop an ICIAP with long-term	N/A

OU #	Issue	Recommendations	Current Status	Current Implementation Status Description	Completion Date (if applicable)
		monitored, and enforced.		stewardship procedures for the West Side.	
1, 2	Documents and procedures should be developed and implemented to ensure that implemented ICs are effective and properly maintained, monitored, and enforced over the long-term.	Develop a Long-term Stewardship Plan or develop equivalent long-term stewardship procedures and protections and incorporate them into the Site O&M Plan.	Considered but Not Implemented	EPA will retain a contractor to assist in the development of long-term stewardship procedures for the East Side of the Site within the ICIAP.  The West Side PRPs will develop long-term stewardship procedures for the West Side within the ICIAP.	N/A

## OTHER FINDINGS

In addition, the 2017 FYR included recommendations that do not affect current nor future protectiveness. Status updates are provided below.

- In 2015 and 2016, thallium was dropped from the sampling protocol without approval from EPA. This needs to be resolved. EPA will meet with the PRPs to discuss decreasing the monitoring frequency and to discuss whether thallium should continue to be excluded from the groundwater sampling program.

### Status Update:

During this review period, EPA reached out to the PRP contractor to discuss the change in monitoring frequency to biennial and eliminating thallium from the sampling protocol, both changes that the West Side PRPs made without EPA's approval. The PRPs did not present an explanation for these changes but agreed to resume groundwater monitoring on an annual basis in 2022. With respect to thallium, the PRP contractor stated that thallium was not detected in prior sampling events so the PRPs eliminated the constituent from the sampling protocol.

- In addition, EPA will further discuss with IDEM the need for a vapor intrusion investigation. In a comment letter dated May 25, 2017, IDEM stated that TCE concentrations in the groundwater suggest that subsurface intrusion may be an exposure route and should be



investigated.

#### Status Update:

Refer to the Vapor Intrusion discussion under Data Review.

## **IV. FIVE-YEAR REVIEW PROCESS**

### **Community Notification, Involvement & Site Interviews**

A public notice was made available by an advertisement in *The Elkhart Truth* on 02/4/2022 stating that there was a FYR and inviting the public to submit any comments to EPA. See Appendix D, Newspaper Article with FYR Public Notice. No comments have been received and no inquiries have been made regarding the FYR. The results of the review and the report will be made available at the Site information repository at the Elkhart Public Library located at 300 South Second Street in Elkhart, Indiana.

#### Interviews

During the FYR process, EPA discussed the Site with the City of Elkhart and IDEM. EPA was not aware of any perceived community concerns associated with the Site. Hence, additional interviews were not conducted for the Site.

#### Data Review

##### **Data Review for the East Side**

The remedy required that the East Side interceptor wells must continue to operate until the groundwater standards were met on the East Side.

The East Side SVE system achieved the soil cleanup goals in 2002. Therefore, the system was shut down which terminated the requirement to collect SVE data. With respect to groundwater, the East Side PRPs have not collected data from the East Side properties since they filed for bankruptcy protection in 2006. Neither the West Side PRPs nor the City of Elkhart have conducted groundwater monitoring on the East Side properties. As a result, there has not been any groundwater monitoring data for the East Side since 2006, but cleanup levels had not been achieved at that time. The 2006 groundwater sampling event on the East Side showed that monitoring wells GMMMW-01, GMMMW-03, and GMMMW-04 had concentrations of TCE ranging from 24 ppb to 120 ppb, which exceeded the Maximum Contaminant Levels (MCLs). However, with the City of Elkhart continuing to operate the interceptor wells, it is anticipated that groundwater from the East Side would still be within the capture area, consistent with the original remedial design. Upcoming sampling will determine remaining contaminant concentrations on the East Side and will assess water levels in order to confirm flow direction and capture. The City of Elkhart municipal water system provides drinking water within the known extent of the East Side plume, and no private wells were noted in this area. The City of Elkhart treats the contaminated groundwater via an air stripper in order to provide safe drinking water.

## Data Review for the West Side

### **West Side Sampling by the City of Elkhart**

The City of Elkhart maintains, operates, and collects samples from interceptor wells (I-1, I-2, I-3, I-4) and the air stripper (influent/effluent). The samples are analyzed for VOCs. Monitoring data from 2017, 2018, and 2020 showed all COCs in the air stripper effluent streams were below their respective MCLs for the West Side. See Appendix C - Main Street Well Field (West Side) Groundwater Monitoring Data (Parts 1 & 2).

### **West Side Sampling by the West Side PRPs**

The West Side PRPs performed groundwater sampling on November 28 and 29, 2017. Additional sampling was performed on November 13 and 14, 2018. Groundwater sampling results from the 2017 and 2018 events are provided also in Appendix C. The most recent groundwater sampling event was performed on November 4 and 5, 2020. TCE ranged from 9.1 to 17 µg/L in November 2020 in monitoring wells MW-18R and MW-21. These two monitoring wells exhibited similar sampling results in 2017 and 2018. Except for TCE, the concentrations of the other COCs ranged from non-detect to below their respective MCLs.

<b>Contaminants</b>	<b>MCLs</b>	<b>MW-17</b>	<b>MW-17</b>	<b>MW18R</b>	<b>MW-20</b>	<b>MW-21</b>	<b>MW-25</b>	<b>MW-14</b>
Cis-1,2-Dichloroethene	70	4.5	4.4	ND (1.0)	11	2.9	2.4	ND (1.0)
Tetrachloroethene	5	0.45 J	0.47 J	2.1	ND (1.0)	ND (1.0)	2.8	0.53 J
Trans-1,2-Dichloroethene	100	0.27 J	0.26 J	ND (1.0)	0.80 J	0.31 J	ND (1.0)	ND (1.0)
Trichloroethene	5	0.67 J	0.60 J	9.1	0.74 J	17	0.49 J	0.28 J
Vinyl Chloride	2	ND (1.0)	ND (1.0)	ND (1.0)	0.78 J	ND (1.0)	ND (1.0)	ND (1.0)

J = estimated concentration  
 ND = not detected above the associated reporting limit

### **Vapor Intrusion**

A comparison of the groundwater analytical results for TCE in West Side monitoring wells MW-18R and MW-21 showed an exceedance of EPA's Vapor Intrusion Screening Level (VISL) criteria (found at the EPA website at <https://www.epa.gov/vaporintrusion/vapor-intrusion-screening-levels-visls>). The 2006 groundwater monitoring data from monitoring wells on the East Side showed VISL exceedances at GMMW-01, GMMW-03, and GMMW-04. Based on these results, EPA believes that there may be possible vapor intrusion pathways into the building(s) on the East Side properties as well as residential property(ies) on the West Side. Therefore, EPA plans to conduct a vapor intrusion investigation (and soil gas sampling) to further evaluate potential vapor inhalation exposure pathways on both the East and West Sides of the Site.

## **Emerging Contaminants**

The City of Elkhart's sampling of the water supply under the Third Unregulated Contaminant Monitoring Rule (UCMR 3) did not detect 1,4-dioxane. However, EPA believes that more updated data should be collected from within the Site to confirm that 1,4 dioxane is not present. Also, a study from the Air Force Center for Engineering and the Environment (Air Force Center for Engineering and the Environment, March 2012) evaluated the co-occurrence of 1,4-dioxane and TCE. This study assessed 5788 groundwater monitoring wells (GMWs) from 49 installations with records for 1,4-dioxane, TCE, and TCA analytes. The results of the study showed 1,4-dioxane was observed in 17.4% of the GMWs with detections for TCE and/or TCA, which accounted for 93.7% of all 1,4-dioxane detections, verifying that 1,4-dioxane is seldom found independent of chlorinated solvent contamination. Surprisingly, 64.4% of all 1,4-dioxane detections were associated with TCE independently. Given the extensive data set, these results conclusively demonstrate that 1,4-dioxane is a relatively common groundwater co-contaminant with TCE. Therefore, EPA believes that it is necessary to sample the Site for 1,4-dioxane to determine whether an unacceptable risk exists that was not addressed by the implemented remedial action. Neither the West Side PRPs nor the East Side PRPs have performed such analysis. EPA will request that the PRPs perform 1,4-dioxane sampling on the West Side. Concerning the East Side, EPA will include 1,4-dioxane in the parameter list for the monitoring well sampling currently being planned.

## **Site Inspection**

No FYR Site inspection was conducted in support of this FYR due to COVID-19 work travel restrictions. IDEM has not conducted a FYR inspection of the Site during this review. A FYR Site inspection has been included as an issue and recommendation of this FYR to make sure it is conducted once work travel restrictions are removed and that a completed Site Inspection Checklist will be included in the site files.

## **V. TECHNICAL ASSESSMENT**

**QUESTION A:** Is the remedy functioning as intended by the decision documents?

**No.** The review of documents for this FYR indicates that it is unclear whether the remedy, with respect to the East Side, is functioning as intended by the decision documents. Specifically, the East Side groundwater monitoring program ceased in 2006 such that the current levels of COCs in the East Side wells are unknown. O&M activities for remedy components on the East Side also ceased at that time when the East Side PRPs filed for bankruptcy. On the East Side, the SVE system was shut down in 2002 once the system achieved soil cleanup goals.

The West Side PRPs manage the O&M activities, including groundwater monitoring for the West Side system. The City of Elkhart currently operates the air stripper system and collects samples from interceptor wells (I-1, I-2, I-3, I-4) and the air stripper (influent/effluent). The samples are analyzed for VOCs. Treated groundwater from the air stripper effluent streams exhibited concentrations of COCs below the MCLs (See Appendix C). This demonstrates that the air stripper is effective.

With respect to the West Side, the monitoring well networks provided sufficient data to assess the progress of the remedy at the West Side portion of the Site. The groundwater plume remained relatively stable based on the most recent groundwater monitoring data on the West Side. There are no concerns that a plume may be migrating. O&M activities on the West Side were sufficient to maintain the overall integrity of the remedy.

The ICs required by the ROD have not been implemented on the East Side Durakool property, and the deed restrictions that were recorded in 1992 on the East Side Excel property may need to be modified since the document that was recorded, titled "*Land Use Restrictions*", may not have the benefits of a restrictive covenant pursuant to the Indiana Code. To restrict groundwater use, an environmental restrictive covenant is planned to be added to the former Durakool property by September 2024 as noted in the Issues and Recommendation section.

A governmental IC in the form of an ordinance for restricting groundwater well installations in contaminated groundwater areas was put in place for Elkhart County. During this FYR review, an aerial view of the Site seemed to suggest that there was a possible private well at the Site; however, the status of the well and its use are not known and need to be investigated. During this 2022 FYR period, the City of Elkhart confirmed that no new groundwater sources or uses were installed on the West Side property that would adversely impact the integrity of the remedy.

During the April 5, 2017 inspection, the East Side of the Site was fenced and locked. There was no way to gain access to the property. From a view of the property there were no visible sign of trespassing nor were there any signs of newly installed wells on the East Side. EPA will need to conduct a well survey at the Site to ensure that no new potable well sources were installed at the Site and that no historical potable wells remain within the contaminant plume. Additionally, an ICIAP will be completed for the Site by September 2023 to explore whether additional ICs are needed, and to ensure and document that long-term stewardship procedures are in place so that ICs are properly maintained, monitored, and enforced.

**QUESTION B:** Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid?

**No.** At the time of the remedy selections, EPA did not address the potential for 1,4-dioxane contamination and possible vapor intrusion exposure pathways respect to the West and East Sides. A recent evaluation of Site data has also highlighted the necessity of an updated private well survey to verify that there is no potable use of contaminated Site groundwater.

At the time of the 1985 and 1991 RODs and the 2020 ESD, EPA had no information regarding the presence / absence of 1,4-dioxane. 1,4-dioxane is an emerging contaminant associated with chlorinated solvents. As chlorinated solvents were used historically at the Site, 1,4-dioxane could potentially be a Site-related contaminant in groundwater. EPA does not have any analytical data to confirm the presence or absence of 1,4-dioxane specifically within the Site plume; therefore, it will be included in the list of sampling parameters on both the East and West Side groundwater sampling events in the future. EPA notes that the City of Elkhart's 2013 sampling of drinking water under the Third Unregulated Contaminant Monitoring Rule (UCMR 3) did not detect 1,4-dioxane, so there are no current consumption concerns associated with the public water supply with respect to 1,4-dioxane.

As discussed earlier, monitoring wells MW-18R and MW-21, located in the residential and industrial area on the West Side, were sampled during the last sampling event and exhibited concentrations above EPA's VISL criteria for TCE. On the East Side properties, the 2006 groundwater sampling report showed exceedances of the EPA's VISL criteria at monitoring wells GMMW-01, GMMW-03, and GMMW-04 during the last sampling event in 2006. EPA is concerned that there may be possible pathways for contaminant vapors into the building and residential structures near these wells. Therefore, soil gas sampling/vapor intrusion investigations will be performed to assess whether additional remedial activities are required to mitigate contaminant exposures.

A recent review of wells recorded in the Indiana Department of Natural Resources Well Viewer showed the presence of several commercial/industrial and private wells on the West Side of the Site. It's not known whether any of these wells are used for consumptive purposes. While these wells may have been assessed during the original Site investigation, no records were found in the Site files. Therefore, a re-survey for potable wells should be conducted to ensure that contaminated groundwater is not being consumed. While there is a municipal restriction on the construction of potable wells, that restriction did grandfather in wells that were in existence at the time that the restriction was put in place.

Finally, the City of Elkhart visits the Site as needed to perform maintenance of equipment. The Botanical Garden maintains an office on the West Side property which is open for business almost daily.

### **Changes in Standards and Things to Be Considered**

There have been no changes in the ARARs nor have there been new standards affecting the protectiveness of the remedy. Some of the ARARs or performance standards cited in the RODs have been met at the Site while other cleanup goals have not been met for some contaminants.

### **Changes in Exposure Pathways, Toxicity, and Other Contaminant Characteristics**

The exposure assumptions used to develop the Human Health Risk Assessment (Life Systems Inc., December 18, 1990), included both current exposures and potential future exposures. There have been no changes in the toxicity factors for the COCs that were used in the risk assessment. These assumptions are conservative and reasonable in evaluating risk and developing risk-based cleanup levels. No change to these assumptions or the cleanup levels developed from them is warranted. There has been no change to the standardized risk assessment methodology that could affect the protectiveness of the remedy. The remedy is progressing as expected and it is expected that all groundwater cleanup goals will be maintained in the future should the Site conditions and surroundings remain constant.

**QUESTION C:** Has any other information come to light that could call into question the protectiveness of the remedy?

**No.** The need for 1,4-dioxane sampling and VI investigation work was discussed above in the response to Question B. There is no additional information that could call into question the protectiveness of the remedy. There are no impacts from natural disasters that would call into question the protectiveness of the remedy. Currently, there are no Site issues related to climate

change impacts not apparent during the remedy selection, remedy implementation or O&M that would interfere with the protectiveness of the remedy.

## VI. ISSUES/RECOMMENDATIONS

Issues/Recommendations				
<b>OU(s) without Issues/Recommendations Identified in the Five-Year Review:</b>				
None				
<b>Issues and Recommendations Identified in the Five-Year Review:</b>				

<b>OU(s): 2</b>	<b>Issue Category: Institutional Controls</b>			
	<b>Issue:</b> ICs are not implemented on one of the two East Side properties.			
	<b>Recommendation:</b> Implement ICs on the East Side of the Site. The existing land use restriction may need to be modified to benefit from new restrictive covenant requirements pursuant to the Indiana Code (IC 13-11-2-1953.5(2)).			
<b>Affect Current Protectiveness</b>	<b>Affect Future Protectiveness</b>	<b>Party Responsible</b>	<b>Oversight Party</b>	<b>Milestone Date</b>
No	Yes	EPA	EPA/State	9/30/2024

<b>OU(s): 2</b>	<b>Issue Category: Monitoring</b>			
	<b>Issue:</b> East Side groundwater monitoring and O&M are not being implemented due to the East Side PRPs filing for bankruptcy in 2006.			
	<b>Recommendation:</b> EPA will perform initial groundwater sampling at the East Side monitoring wells. Responsibility for long-term monitoring will be coordinated with IDEM.			
<b>Affect Current Protectiveness</b>	<b>Affect Future Protectiveness</b>	<b>Party Responsible</b>	<b>Oversight Party</b>	<b>Milestone Date</b>
No	Yes	EPA/State	EPA/State	9/30/2023

<b>OU(s): 1, 2</b>	<b>Issue Category: Institutional Controls</b>			
	<b>Issue:</b> Additional ICs may be needed for the West Side; long-term stewardship procedures are needed.			
	<b>Recommendation:</b> Develop an ICIAP for the West Side whose purpose is to conduct IC evaluation activities to identify the needed ICs, ensure that			



	the implemented ICs are effective, and to ensure that long-term stewardship procedures are developed so that ICs are properly maintained, monitored, and enforced.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	PRP	EPA/State	9/30/2023

OU(s): 1, 2	<b>Issue Category: Institutional Controls</b>			
	<b>Issue:</b> Additional ICs may be needed for the East Side; long-term stewardship procedures are needed.			
	<b>Recommendation:</b> Develop an ICIAP for the East Side whose purpose is to conduct IC evaluation activities to identify the needed ICs, ensure that the implemented ICs are effective, and to ensure that long-term stewardship procedures are developed so that ICs are properly maintained, monitored, and enforced.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	EPA	EPA/State	9/30/2023

OU(s): 1, 2	<b>Issue Category: Other</b>			
	<b>Issue:</b> Due to COVID-19 work travel restrictions, a FYR Site inspection was not conducted at the Site.			
	<b>Recommendation:</b> EPA will conduct a FYR Site inspection once COVID-19 work travel restrictions are removed and will complete the Inspection Checklist to include in Site files.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	EPA	EPA	12/30/2022

OU(s): 1, 2	<b>Issue Category: Other</b>			
	<b>Issue:</b> EPA's VISL criteria are exceeded for TCE in GMMW-01, GMMW-03, and GMMW-04 based on 2006 data. Current data are not available.			

	<b>Recommendation:</b> EPA will sample East Side monitoring wells to obtain updated groundwater contaminant concentration data. If concentrations exceed VISLs, EPA will perform a vapor intrusion investigation on the East Side near the former Excel/Durakool buildings to evaluate any potential vapor inhalation concerns.			
<b>Affect Current Protectiveness</b>	<b>Affect Future Protectiveness</b>	<b>Party Responsible</b>	<b>Oversight Party</b>	<b>Milestone Date</b>
No	Yes	EPA	EPA	12/31/2023

<b>OU(s): 1, 2</b>	<b>Issue Category: Other</b>			
	<b>Issue:</b> EPA's groundwater VISL screening criterion was exceeded for TCE in MW-18R and MW-21 on the West Side. No information is available to determine whether a vapor intrusion pathway exists.			
	<b>Recommendation:</b> Conduct a vapor intrusion investigation on the West Side to evaluate whether vapor intrusion pathways are present near MW-18 and MW-21.			
<b>Affect Current Protectiveness</b>	<b>Affect Future Protectiveness</b>	<b>Party Responsible</b>	<b>Oversight Party</b>	<b>Milestone Date</b>
No	Yes	PRP	EPA	12/31/2023

<b>OU(s): 1, 2</b>	<b>Issue Category: Other</b>			
	<b>Issue:</b> The Indiana Department of Natural Resources Water Well Viewer shows possible private wells on the West Side.			
	<b>Recommendation:</b> EPA will request that a well survey be performed to confirm that there are no potable wells in use within the Site contaminant plume.			
<b>Affect Current Protectiveness</b>	<b>Affect Future Protectiveness</b>	<b>Party Responsible</b>	<b>Oversight Party</b>	<b>Milestone Date</b>
No	Yes	PRP	EPA/State	12/31/2022

<b>OU(s): 1, 2</b>	<b>Issue Category: Other</b>			
	<b>Issue:</b> 1,4-Dioxane is an emerging contaminant that may be present at the Site.			

<b>Recommendation:</b> EPA will request that the West Side PRPs perform groundwater sampling and analysis for 1,4-dioxane on the West Side; EPA will perform sampling and analysis for 1,4-dioxane on the East Side.				
<b>Affect Current Protectiveness</b>	<b>Affect Future Protectiveness</b>	<b>Party Responsible</b>	<b>Oversight Party</b>	<b>Milestone Date</b>
No	Yes	PRP	EPA/State	12/31/2023

**OTHER FINDINGS**

In addition, the following are recommendations that were identified during the FYR that may improve the performance of the remedy and reduce costs, but do not affect current nor future protectiveness:

- In 2015 and 2016, thallium was dropped from the sampling protocol without approval from EPA. This needs to be resolved. EPA will meet with the PRPs to discuss whether thallium should continue to be excluded from the groundwater sampling program. EPA will meet with the West Side PRPs to resolve this issue this year.
- During this FYR period, the West Side PRPs submitted a proposed monitoring optimization report in which the PRPs requested that EPA approve the following modifications to the West Side monitoring program:
  1. Reduction of the groundwater monitoring from annual to biennial;
  2. Closure of unused and/or redundant monitoring wells;
  3. Continuation of annual well inspections and repairs as warranted;
  4. Submittal of biennial monitoring reports to EPA and IDEM.

EPA has reviewed the PRPs’ request for modifications but has not approved the request at this time. EPA and IDEM plan to meet with the PRPs in 2022 to discuss the modification request.

**VII. PROTECTIVENESS STATEMENT**

<b>OUs 1 &amp; 2/Sitewide Protectiveness Statement(s)</b>	
<i>Protectiveness Determination:</i> Protectiveness Deferred	Planned Addendum Completion Date: 03/30/2024
<i>Protectiveness Statement:</i>	
A protectiveness determination of the remedy at the Main Street Well Field Site cannot be made at this time until further information is obtained. Further information will be obtained by	

### **OUs 1 & 2/Sitewide Protectiveness Statement(s)**

taking the following actions: conducting groundwater sampling on the East Side; completing a vapor intrusion investigation on the West Side near residential monitoring wells MW-18R and MW-21; conducting a vapor intrusion investigation on the East Side properties if East Side groundwater concentrations exceed VISLs; conducting a survey of potable wells near the Site; and evaluating the potential for 1,4-dioxane within the contaminant plume. It is expected that these actions will take approximately 1.5 years to complete, at which time a protectiveness determination will be made.

### **VIII. NEXT REVIEW**

The next FYR report for the Main Street Well Field Superfund Site is required five years from the completion date of this review.

**APPENDIX A**  
**REFERENCES**

Record of Decision, (EPA, August 1985).

Record of Decision, (EPA, March 1991).

Main Street Well Field Remedial Investigation Report, final May 25, 1989; CDM Federal Programs Corporation.

Remedial Investigation, Volume 1, (Camp Dresser & McKee, May 25, 1989).

Appendices A, D, E, F, G, H, I, and J, for Main Street Well Field Superfund Site, Elkhart, Indiana, Public Comment Draft Feasibility Study, (Donohue & Associates, Donohue Project Number 20010, sdms doc. 248680, January 1991).

Explanation of Significant Difference for the Main Street Well Field Site (EPA, May 29, 2020).

Final Remedial Design Report for The Soil Vapor Extraction System, (EPA, September 30, 1993).

Draft Risk Assessment for Remedial Alternatives Report, Appendix H, Alternative Risk Assessment, Main Street Well Field Site, Elkhart, Indiana, (Life Systems Inc., December 18, 1990).

Feasibility Study for Soil Remediation Excel Corporation, (Geraghty & Miller, Inc., Environmental Services, February 1991).

Elkhart County Private Water Well Ordinance, Ordinance No. 2017-24, (Elkhart County Board of Health, September 28, 2017).

Preliminary Close Out Report, (EPA, September 28, 1995).

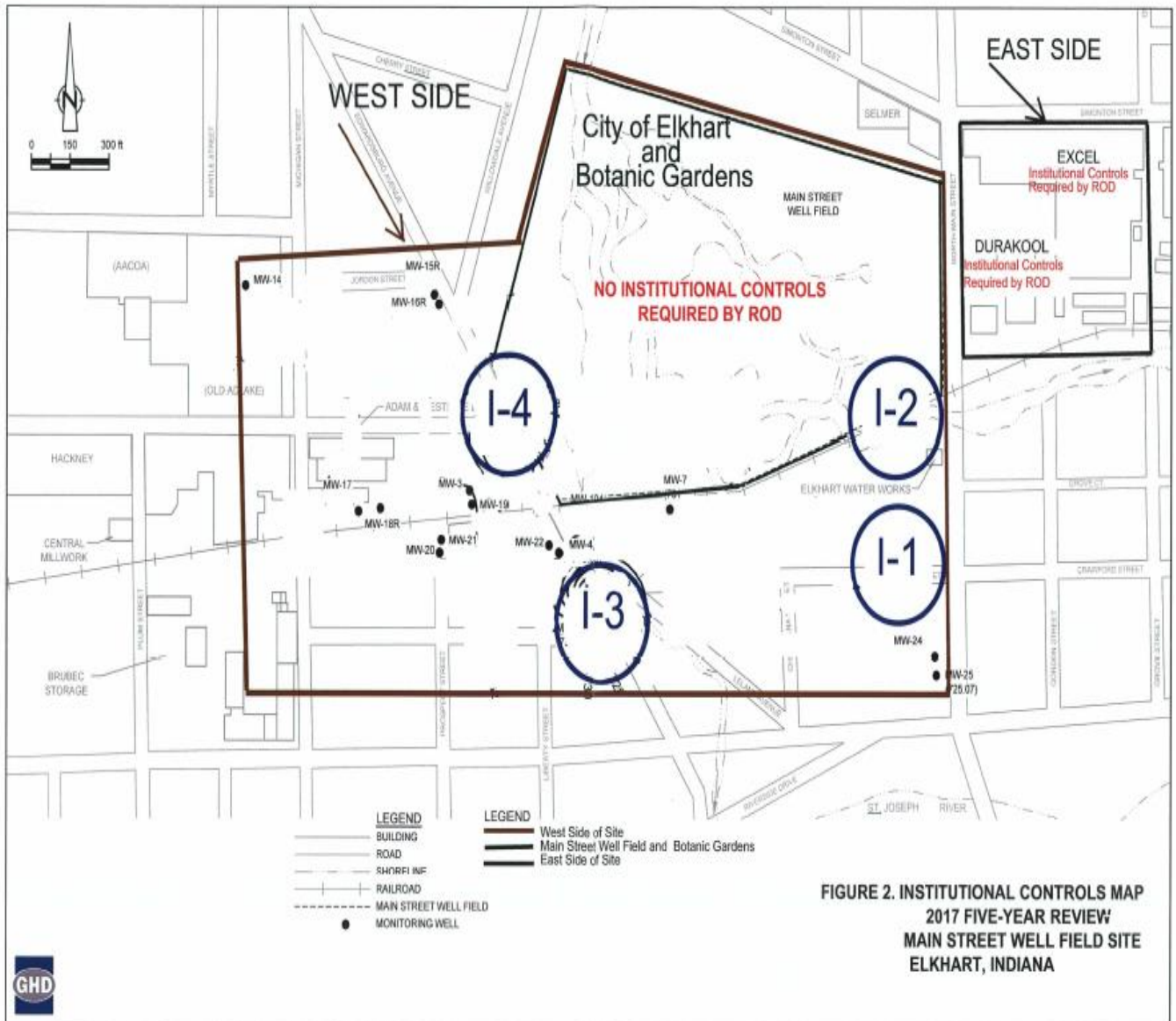
Administrative Order for Remedial Design and Remedial Action (EPA, February 20, 1992), SEMS doc. no. 135327.

Co-Occurrence of 1,4-Dioxane with Trichloroethylene in Chlorinated Solvent Groundwater Plumes at US Air Force Installations: Fact or Fiction, (Air Force Center for Engineering and the Environment, March 12, 2012).

Preliminary Closeout Report, (EPA, September 1995).

Pre-Final Design Report, East Side Remedial Activities, Main Street Well Field Site, Elkhart, Indiana, (Geraghty & Miller, August 6, 1993), sems doc 05-162126.

**APPENDIX B**  
**INSTITUTIONAL CONTROLS MAP**  
**FOR**  
**MAIN STREET WELL FIELD SITE ELKHART INDIANA**





**APPENDIX C**

**MAIN STREET WELL FIELD  
(WEST SIDE)**

**GROUNDWATER MONITORING DATA**

**(Part 1 of 2)**

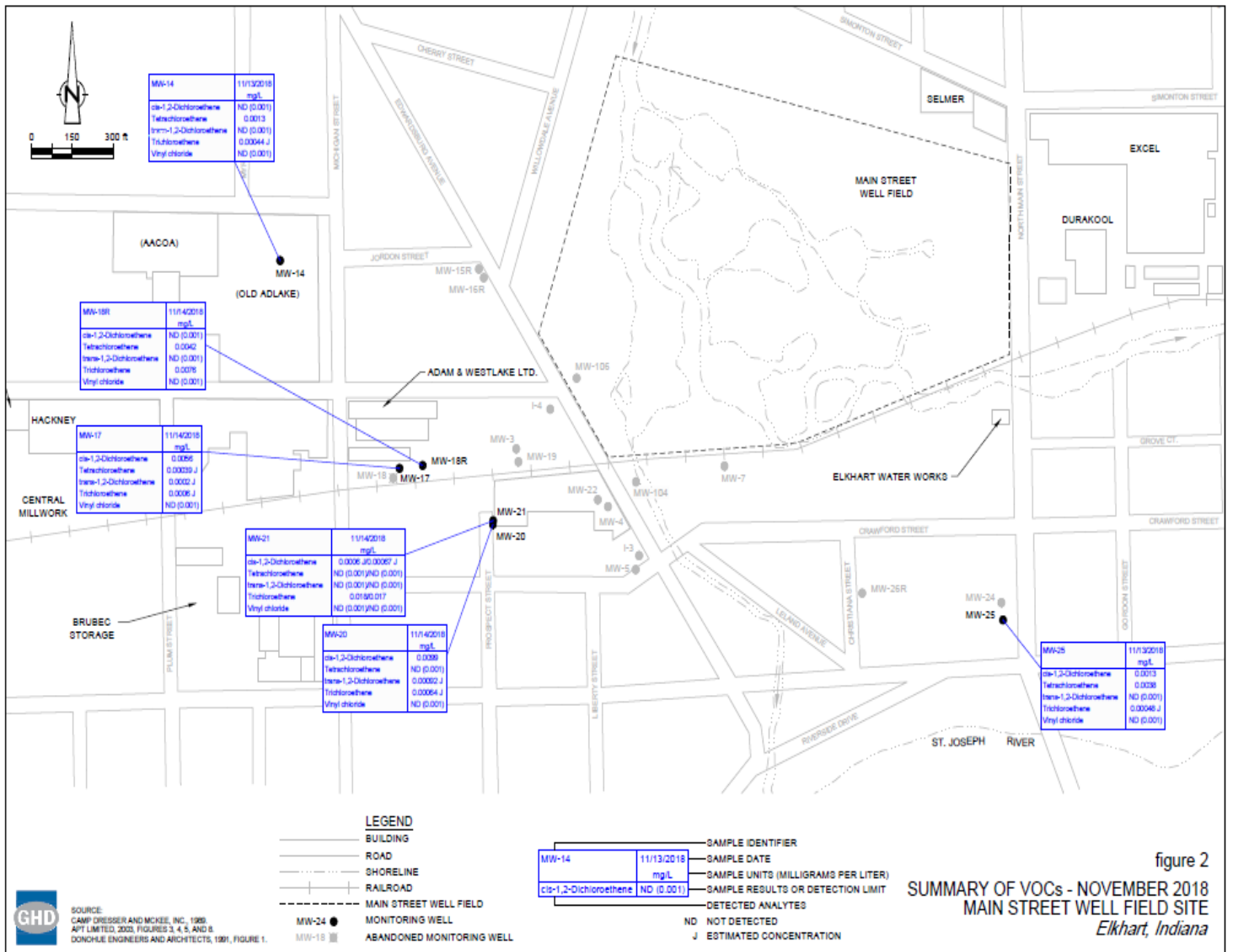


figure 2  
SUMMARY OF VOCs - NOVEMBER 2018  
MAIN STREET WELL FIELD SITE  
Elkhart, Indiana

GHD SOURCE: CAMP DRESSER AND MCKEE, INC. 1989, APT LIMITED, 2002, FIGURES 3, 4, 5, AND 8, DONOHUE ENGINEERS AND ARCHITECTS, 1991, FIGURE 1.

37900-16(MRG16)GN-CO002 JAN 21, 2019

Analytical Results Summary  
 November 2018  
 Main Street Well Field  
 Elkhart, Indiana

Sample Location:		MW-14	MW-17	MW-18R	MW-20	MW-21	MW-21	MW-25	
Sample ID:		GW-111318-JH-01	GW-111418-JH-04	GW-111418-JH-03	GW-111418-JH-06	GW-111418-JH-07	GW-111418-JH-08	GW-111318-JH-02	
Sample Date:		11/13/2018	11/14/2018	11/14/2018	11/14/2018	11/14/2018	11/14/2018	11/13/2018	
Parameters	Units	EPA MCL a							
<b>Volatile Organic Compounds</b>									
cis-1,2-Dichloroethene	mg/L	0.07	ND (0.001)	0.0056	ND (0.001)	0.0099	0.0006 J	0.00067 J	0.0013
Tetrachloroethene	mg/L	0.005	0.0013	0.00039 J	0.0042	ND (0.001)	ND (0.001)	ND (0.001)	0.0038
trans-1,2-Dichloroethene	mg/L	0.1	ND (0.001)	0.0002 J	ND (0.001)	0.00092 J	ND (0.001)	ND (0.001)	ND (0.001)
Trichloroethene	mg/L	0.005	0.00044 J	0.0006 J	0.0076 <sup>a</sup>	0.00064 J	0.018 <sup>a</sup>	0.017 <sup>a</sup>	0.00048 J
Vinyl chloride	mg/L	0.002	ND (0.001)	ND (0.001)	ND (0.001)	ND (0.001)	ND (0.001)	ND (0.001)	ND (0.001)

Notes:  
 ND - Not detected at the associated reporting limit.  
 J - Estimated concentration.  
 mg/L - milligrams per Liter

**Groundwater Elevation Summary**  
**November 2018**  
**Main Street Well Field Site**  
**Elkhart, Indiana**

Well Identifier	Reference Elevation (Top of Casing) (ft AMSL) <sup>1</sup>	11/13/18	
		Depth to Groundwater (ft BTOC) <sup>2</sup>	Groundwater Elevation (ft AMSL)
MW-3	749.83	18.25	731.58
MW-4	748.37	19.24	729.13
MW-5	750.66	21.00	729.66
MW-7	750.89	21.49	729.40
MW-14	748.16	11.88	736.28
MW-15R	747.39	13.31	734.08
MW-16R	747.20	13.12	734.08
MW-17	749.92	17.20	732.72
MW-18 <sup>5</sup>	750.14	--	--
MW-18R <sup>6</sup>	751.24	18.43	732.81
MW-19	748.84	17.25	731.59
MW-20	749.60	17.98	731.62
MW-21	749.14	17.47	731.67
MW-22	748.41	19.38	729.03
MW-24	750.86	25.74	725.12
MW-25	751.36	26.25	725.11
MW-26R	745.21	20.21	725.00
MW-104	748.32	18.86	729.46
MW-106	750.13	20.26	729.87
I-3 <sup>7</sup>	750.39	41.50	708.89
I-4 <sup>7</sup>	750.64	34.10	716.54

**Notes:**

- <sup>1</sup> ft AMSL - feet above mean sea level
- <sup>2</sup> ft BTOC - feet below top of casing
- <sup>3</sup> NS - Not surveyed, no elevation information
- <sup>4</sup> NR - Depth to groundwater not recorded during monitoring event
- <sup>5</sup> Monitoring well MW-18 abandoned November 9, 2012
- <sup>6</sup> Monitoring well MW-18R installed November 9, 2012
- <sup>7</sup> Groundwater elevations presented on Figure 1 are based on water level in interceptor wells with an assumed well efficiency of 70%.

MONITORING WELL IDENTIFICATION	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
MW 17	11/13/18							
WATER LEVEL FT BTOC	17.20							
TOTAL DEPTH FT BTOC	54.80							
LOCK	Good							
PROTECTIVE CASING	Good							
CONCRETE PAD	Damaged by Tree							
WELL IDENTIFICATION	Good							
ACTIONS TAKEN	none							

MONITORING WELL IDENTIFICATION	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
MW 18	5/19/05	12/14/05	5/2/06	11/1/06	11/6/07	1/1/08	11/5/08	11/23/09
WATER LEVEL FT BTOC	N.A.	16.53	18.29	16.41	14.44	15.15	14.23	16.04
TOTAL DEPTH FT. BTOC	N.A.	24.57	24.80	21.43	20.39	20.39	24.80	24.76
LOCK	Replaced	good	good	good	good	good	good	good
PROTECTIVE CASING	good	good	good	good	good	good	good	good
CONCRETE PAD	good	good	good	good	good	good	good	good
WELL IDENTIFICATION	Replaced	good	good	good	good	good	good	Re-labeled
ACTIONS TAKEN	Well has obstruction at ~20ft BTOC.	Removed 4.5 feet of Roots from Well	none	none	well has obstruction at 20.39ft BTOC.	none	none	Re-labeled

MONITORING WELL IDENTIFICATION	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
MW 20	5/17/05	12/14/05	5/2/06	11/1/06	11/6/07	1/9/08	11/5/08	11/23/09
WATER LEVEL FT BTOC	20.97	17.10	18.85	16.81	14.81	15.68	14.39	16.40
TOTAL DEPTH FT BTOC	55.09	55.09	55.08	55.03	55.07	55.05	55.02	55.24
LOCK	Replaced	good	good	good	good	good	good	good
PROTECTIVE CASING	good	good	good	good	good	good	good	good
CONCRETE PAD	good	good	good	good	good	good	good	good
WELL IDENTIFICATION	Replaced	good	good	good	good	good	good	re-labeled
ACTIONS TAKEN	Replaced lock and well I.D.	none	none	none	none	none	none	re-labeled

MONITORING WELL IDENTIFICATION	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
MW 20	11/16/10	11/15/11	11/13/12	11/14/13	11/18/14	11/4/15	11/29/16	11/28/17
WATER LEVEL FT BTOC	19.23	17.36	18.04	19.11	18.93	21.43	17.26	15.17
TOTAL DEPTH FT BTOC	55.10	55.21	55.21	55.23	55.22	55.05	55.07	55.09
LOCK	good	GOOD	Good	Good	Good	Good	Good	Good
PROTECTIVE CASING	good	GOOD	Good	Good	Good	Good	Good	Good
CONCRETE PAD	good	GOOD	Good	Good	Good	Good	Good	Good
WELL IDENTIFICATION	good	GOOD	Good	Good	Good	Good	Good	Good
ACTIONS TAKEN	none	NONE BENT BOLLARD POSTS	none slightly Bent BOLLARD POSTS	none slightly Bent BOLLARD POSTS	none bent BOLLARD POSTS	Good slightly Bent BOLLARD POSTS	Good slightly Bent BOLLARD POSTS	none

MONITORING WELL IDENTIFICATION

	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
MW 20	11/16/10	11/15/11	11/13/12	11/14/13	11/18/14	11/4/15	11/29/16	11/29/17
WATER LEVEL FT BTOC	19.23	17.36	18.04	19.11	18.93	21.43	17.26	15.17
TOTAL DEPTH FT BTOC	55.10	55.21	55.21	55.23	55.22	55.05	55.07	55.09
LOCK	good	GOOD	Good	Good	Good	Good	Good	Good
PROTECTIVE CASING	good	GOOD	Good	Good	Good	Good	Good	Good
CONCRETE PAD	good	GOOD	Good	Good	Good	Good	Good	Good
WELL IDENTIFICATION	good	GOOD	Good	Good	Good	Good	Good	Good
ACTIONS TAKEN	none	NONE BENT BOLLARD POSTS	none slightly Bent BOLLARD POSTS	none slightly Bent BOLLARD POSTS	none Bent BOLLARD POSTS	Good slightly Bent BOLLARD POSTS	Good slightly Bent BOLLARD POSTS	none

MONITORING WELL IDENTIFICATION

	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
MW 21	11/16/10	11/15/11	11/13/12	11/14/13	11/18/14	11/4/15	11/29/16	11/29/17
WATER LEVEL FT BTOC	18.75	16.90	17.55	18.64	18.44	20.93	16.78	14.69
TOTAL DEPTH FT BTOC	34.95	35.05	35.05	35.04	35.05	34.95	34.96	34.98
LOCK	good	GOOD	GOOD	Good	Good	Good	Good	Good
PROTECTIVE CASING	good	GOOD	GOOD	Good	Good	Good	Good	Good
CONCRETE PAD	good	GOOD	GOOD	Good	Good	Good	Good	Good
WELL IDENTIFICATION	good	GOOD	GOOD	Good	Good	Good	Good	Good
ACTIONS TAKEN	none	NONE BENT BOLLARD POSTS	none slightly Bent BOLLARD POSTS	none slightly Bent BOLLARD POSTS	none Bent BOLLARD POSTS	none Bent BOLLARD POSTS	none slightly Bent BOLLARD POSTS	none

MONITORING WELL INSPECTION REPORT  
 MAIN STREET WELL FIELD SITE  
 ELKART, INDIANA

MONITORING WELL IDENTIFICATION	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
MW <u>21</u>	<u>11/13/18</u>							
WATER LEVEL FT BTOC	<u>17.47</u>							
TOTAL DEPTH FT BTOC	<u>34.90</u>							
LOCK	<u>Good</u>							
PROTECTIVE CASING	<u>Good</u>							
CONCRETE PAD	<u>Good</u>							
WELL IDENTIFICATION	<u>Good</u>							
ACTIONS TAKEN	<u>none</u>							

MONITORING WELL IDENTIFICATION	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
MW <u>104</u>	<u>11/16/10</u>	<u>11/15/11</u>	<u>11/13/12</u>	<u>11/14/13</u>	<u>11/18/14</u>	<u>11/4/15</u>	<u>11/29/16</u>	<u>11/28/17</u>
WATER LEVEL FT BTOC	<u>19.34</u>	<u>N/A</u>	<u>18.01</u>	<u>19.62</u>	<u>20.05</u>	<u>22.52</u>	<u>17.41</u>	<u>14.78</u>
TOTAL DEPTH FT BTOC	<u>29.69</u>	<u>N/A</u>	<u>29.79</u>	<u>29.80</u>	<u>29.80</u>	<u>29.79</u>	<u>29.79</u>	<u>29.76</u>
LOCK	<u>good</u>	<u>N/A</u>	<u>Good</u>	<u>Good</u>	<u>Good</u>	<u>Good</u>	<u>Good</u>	<u>Good</u>
PROTECTIVE CASING	<u>good</u>	<u>N/A</u>	<u>Good</u>	<u>Good</u>	<u>Good</u>	<u>Bad</u>	<u>Bad</u>	<u>Good</u>
CONCRETE PAD	<u>good</u>	<u>N/A</u>	<u>Good</u>	<u>Good</u>	<u>Good</u>	<u>Bad</u>	<u>Bad</u>	<u>Good</u>
WELL IDENTIFICATION	<u>good</u>	<u>N/A</u>	<u>Good</u>	<u>Good</u>	<u>Good</u>	<u>Good</u>	<u>Good</u>	<u>Good</u>
ACTIONS TAKEN	<u>none</u>	<u>NONE*</u>	<u>none</u>	<u>none</u>	<u>none</u>	<u>none</u>	<u>none</u>	<u>none</u>

\* WELL BURIED UNDER DIRT/SAND PILES  
 COULD NOT LOCATE

well has frost heaved  
 pro-top needs to be reset

Area has been landscaped  
 pro-top needs to be reset



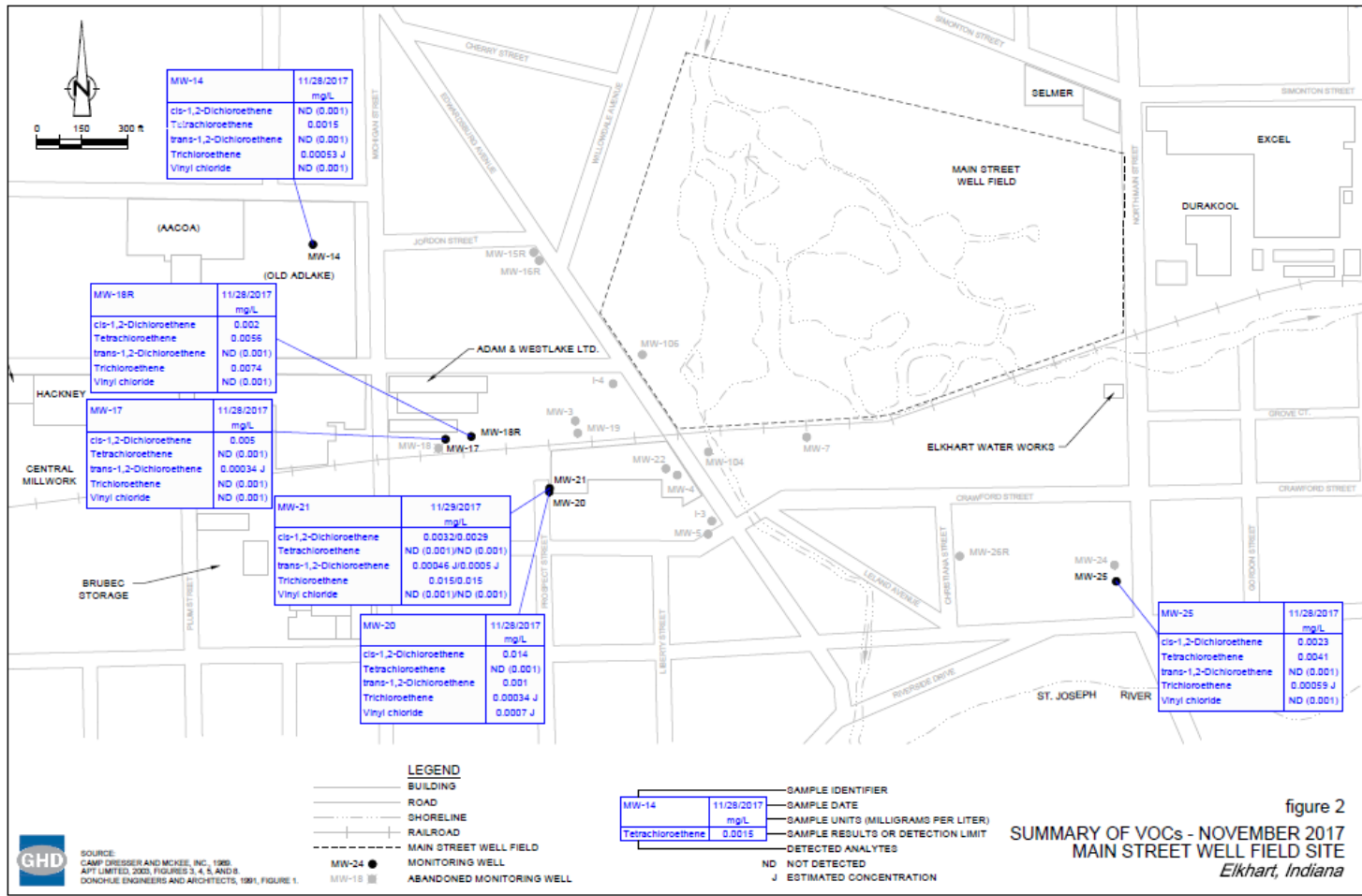


figure 2  
**SUMMARY OF VOCs - NOVEMBER 2017**  
**MAIN STREET WELL FIELD SITE**  
*Elkhart, Indiana*

GHD  
 SOURCE:  
 CAMP DRESSER AND MCKEE, INC., 1980.  
 APT LIMITED, 2002, FIGURES 3, 4, 5, AND 8.  
 DONOHUE ENGINEERS AND ARCHITECTS, 1991, FIGURE 1.

**Table 1**  
**Groundwater Elevation Summary**  
**November 2017**  
**Main Street Well Field Site**  
**Elkhart, Indiana**

Well Identifier	Reference Elevation (Top of Casing) (ft AMSL) <sup>1</sup>	11/28/17	
		Depth to Groundwater (ft BTOC)	Groundwater Elevation (ft AMSL)
MW-3	749.83	15.03	734.80
MW-4	748.37	15.42	732.95
MW-5	750.66	17.41	733.25
MW-7	750.89	16.73	734.16
MW-14	748.16	10.01	738.15
MW-15R	747.39	9.62	737.77
MW-16R	747.20	9.48	737.72
MW-17	749.92	14.66	735.26
MW-18 <sup>5</sup>	750.14	--	--
MW-18R <sup>6</sup>	751.24	15.86	735.38
MW-19	748.84	14.04	734.80
MW-20	749.60	15.17	734.43
MW-21	749.14	14.69	734.45
MW-22	748.41	15.51	732.90
MW-24	750.86	23.80	727.06
MW-25	751.36	23.36	728.00
MW-26R	745.21	16.27	728.94
MW-104	748.32	14.78	733.54
MW-106	750.13	15.94	734.19
I-3 <sup>7</sup>	750.39	43.00	707.39
I-4 <sup>7</sup>	750.64	34.00	716.64

**Notes:**

<sup>1</sup> ft AMSL - feet above mean sea level

<sup>2</sup> ft BTOC - feet below top of casing

<sup>3</sup> NS - Not surveyed, no elevation information

<sup>4</sup> NR - Depth to groundwater not recorded during monitoring event

<sup>5</sup> Monitoring well MW-18 abandoned November 9, 2012

<sup>6</sup> Monitoring well MW-18R installed November 9, 2012

<sup>7</sup> Groundwater elevations presented on Figure 1 are based on water level in interceptor wells with an assumed well efficiency of 70 percent.

**Monitoring Well Purging Summary  
November 2017  
Main Street Well Field Site  
Elkhart, Indiana**

Well Identifier	Date	Time Purged	pH (Std. Units)	Conductivity (ms/cm) <sup>1</sup>	Temp. (°C)	Dissolved Oxygen mg/L <sup>2</sup>	ORP (mV) <sup>3</sup>	Turbidity (NTU) <sup>4</sup>	Flow Rate mL/min <sup>5</sup>	Water Level ft btoc <sup>6</sup>	Observations
MW-14	11/28/2017	13:50	Start pump						450	10.04	
		14:00	7.39	0.825	15.74	1.81	145.4	16.6	450	10.05	Clear, no odor
		14:10	7.39	0.826	15.75	1.88	141.4	9.7	450	10.05	Clear, no odor
		14:15	7.40	0.825	15.74	1.87	132.8	7.3	450	10.05	Clear, no odor
		14:20	7.40	0.824	15.73	1.89	121.1	7.28	450	10.06	Clear, no odor
		14:25	7.40	0.823	15.81	1.89	97.3	5.72	450	10.06	Clear, no odor
		14:30	7.40	0.821	15.86	1.84	96.8	7.00	450	10.06	Clear, no odor
		14:35	7.41	0.821	15.84	1.85	95	5.33	450	10.06	Clear, no odor
MW-25	11/28/2017	15:00	Start pump						400	23.36	
		15:10	7.38	0.512	13.41	2.14	240.0	5.24	400	23.37	Clear, no odor
		15:20	7.38	0.512	13.44	1.64	280.1	4.85	400	23.37	Clear, no odor
		15:30	7.38	0.512	13.50	1.38	266.3	4.80	400	23.38	Clear, no odor
		15:35	7.39	0.512	13.58	1.31	250.4	5.09	400	23.38	Clear, no odor
		15:40	7.39	0.512	13.50	1.26	243.2	5.89	400	23.38	Clear, no odor
MW-17	11/28/2017	16:10	Start pump						480	14.66	
		16:20	7.48	0.709	15.05	0.86	-56.4	9.74	480	14.66	Clear, no odor
		16:30	7.48	0.707	15.17	0.61	-66.8	7.31	480	14.67	Clear, no odor
		16:35	7.48	0.708	14.90	0.54	-77.7	6.12	480	14.67	Clear, no odor
		16:40	7.47	0.707	14.91	0.52	-78.1	6.76	480	14.67	Clear, no odor
		16:45	7.48	0.707	14.88	0.53	-76	7.07	480	14.67	Clear, no odor
MW-18R	11/28/2017	16:55	Start pump						440	15.86	
		17:05	7.30	0.738	16.15	1.19	0.6	7.6	440	15.87	Clear, no odor
		17:15	7.39	0.738	16.11	1.17	-0.6	6.41	440	15.87	Clear, no odor
		17:20	7.30	0.738	16.09	1.16	-1.2	5.72	440	15.88	Clear, no odor
		17:25	7.30	0.738	16.09	1.13	-2.2	5.52	440	15.88	Clear, no odor
		17:30	7.30	0.738	16.12	1.14	-2.0	6.3	440	15.88	Clear, no odor
MW-20	11/29/2017	8:10	Start pump						490	15.10	
		8:20	7.60	0.670	13.43	0.19	-92.3	14.60	490	15.09	Clear, no odor
		8:30	7.58	0.668	12.46	0.26	-86.5	12.60	490	15.09	Clear, no odor
		8:35	7.59	0.668	13.74	0.20	-96.1	10.90	490	15.09	Clear, no odor
		8:40	7.58	0.667	13.71	0.20	-94.7	9.90	490	15.09	Clear, no odor
		8:45	7.58	0.668	13.80	0.19	-90.1	9.60	490	15.09	Clear, no odor
MW-21	11/29/2017	9:05	Start pump						400	14.98	
		9:15	7.49	0.721	14.20	0.60	-40.1	38.8	400	14.71	Slightly cloudy, no odor
		9:25	7.49	0.723	14.50	0.44	-56.1	20.5	400	14.73	Clear, no odor
		9:35	7.48	0.723	14.49	0.40	-63.1	15.10	400	14.78	Clear, no odor
		9:45	7.48	0.722	14.52	0.45	-49.3	7.50	400	14.78	Clear, no odor
		9:50	7.48	0.722	14.49	0.45	-53.5	6.40	400	14.78	Clear, no odor
		9:55	7.47	0.722	14.46	0.5	-56	6.21	400	14.79	Clear, no odor

Notes:

Table 4

Groundwater Analytical Results Summary  
November 2017  
Main Street Well Field  
Elkhart, Indiana

Sample Location:		MW-14	MW-17	MW-18R	MW-20	MW-21	MW-21	MW-25	
Sample ID:		GW-112817-JH-01	GW-112817-JH-03	GW-112817-JH-04	GW-112817-JH-06	GW-112817-JH-07	GW-112817-JH-08	GW-112817-JH-02	
Sample Date:		11/28/2017	11/28/2017	11/28/2017	11/28/2017	11/29/2017	11/29/2017 (Duplicate)	11/28/2017	
Parameters	Units	EPA MCL							
		a							
<b>Volatile Organic Compounds</b>									
cis-1,2-Dichloroethene	mg/L	0.07	ND (0.001)	0.005	0.002	0.014	0.0032	0.0029	0.0023
Tetrachloroethene	mg/L	0.005	0.0015	ND (0.001)	0.0056 <sup>a</sup>	ND (0.001)	ND (0.001)	ND (0.001)	0.0041
trans-1,2-Dichloroethene	mg/L	0.1	ND (0.001)	0.00034 J	ND (0.001)	0.001	0.00046 J	0.0005 J	ND (0.001)
Trichloroethene	mg/L	0.005	0.00053 J	ND (0.001)	0.0074 <sup>a</sup>	0.00034 J	0.015 <sup>a</sup>	0.015 <sup>a</sup>	0.00059 J
Vinyl chloride	mg/L	0.002	ND (0.001)	ND (0.001)	ND (0.001)	0.0007 J	ND (0.001)	ND (0.001)	ND (0.001)

**Notes:**

ND - Not detected at the associated reporting limit.

J - Estimated concentration.

**APPENDIX C**

**MAIN STREET WELL FIELD  
(WEST SIDE)**

**GROUNDWATER MONITORING DATA**

**(Part 2 of 2)**

## Air Stripper Tower and Interceptor Well Data

Date	Wellfield	Dichloroethene(c-1,2)	Dichloroethene(t-1,2)	Tetrachloroethene	Trichloroethane(1,1,1)	Trichloroethene	Vinylchloride
12/9/2021	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005
12/9/2021	A.S.T. 2		0.0018	<	0.0005		0.0043
11/10/2021	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005
11/10/2021	A.S.T. 1		0.0019	<	0.0005		0.0040
11/4/2021	WELL I1		0.0013	<	0.0005		0.0039
10/15/2021	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005
10/15/2021	A.S.T. 3		0.0051	<	0.0005		0.0041
10/12/2021	WELL I4	<	0.0005	<	0.0005	<	0.0005
10/12/2021	WELL I3		0.0035	<	0.0005		0.0150
10/12/2021	WELL I2		0.0040	<	0.0005		0.0120
9/24/2021	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005
9/24/2021	A.S.T.2		0.0035	<	0.0005		0.0022
8/4/2021	WELL I3	<	0.0005	<	0.0005	<	0.0005
8/4/2021	WELL I2		0.0110		0.0005		0.0008
8/4/2021	WELL I4		0.0041	<	0.0005		0.0130
7/16/2021	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005
7/16/2021	A.S.T. 1		0.0027	<	0.0005		0.0020
7/7/2021	WELL I2		0.0006	<	0.0005	<	0.0005
7/7/2021	WELL I1	<	0.0005	<	0.0005	<	0.0005
7/7/2021	WELL I4		0.0090	<	0.0005		0.0006
7/7/2021	WELL I3		0.0023	<	0.0005		0.0120
6/25/2021	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005
6/25/2021	A.S.T. 1		0.0040	<	0.0005		0.0020
5/12/2021	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005
5/12/2021	A.S.T. 2		0.0035	<	0.0005		0.0023
5/4/2021	WELL I3		0.0016	<	0.0005	<	0.0005
5/4/2021	WELL I2		0.0100	<	0.0005	<	0.0005
5/4/2021	WELL I4	<	0.0005		0.0006		0.0005
5/4/2021	WELL I1		0.0041	<	0.0005		0.0130
4/16/2021	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005
4/16/2021	A.S.T. 2		0.0033	<	0.0005		0.0026
4/13/2021	WELL I1		0.0014	<	0.0005	<	0.0005
4/13/2021	WELL I2	<	0.0005	<	0.0005	<	0.0005
4/13/2021	WELL I4		0.0091		0.0006		0.0006
4/13/2021	WELL I3		0.0034	<	0.0005	<	0.0120
3/19/2021	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005
3/19/2021	A.S.T. 2		0.0013	<	0.0005	<	0.0005
3/8/2021	WELL I2		0.0016	<	0.0005	<	0.0005
3/8/2021	WELL I3	<	0.0005	<	0.0005	<	0.0005
3/8/2021	WELL I4		0.0100		0.0005		0.0005
3/8/2021	WELL I1		0.0044	<	0.0005		0.0120
2/19/2021	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005
2/19/2021	A.S.T. 1		0.0036	<	0.0005		0.0017

## Air Stripper Tower and Interceptor Well Data

Date	Wellfield	Dichloroethene(c-1,2)	Dichloroethene(t-1,2)	Tetrachloroethene	Trichloroethane(1,1,1)	Trichloroethene	Vinylchloride						
2/2/2021	WELL I4		0.0014	<	0.0005	<	0.0005	<	0.0005				
2/2/2021	WELL I1	<	0.0005	<	0.0005	<	0.0005	<	0.0005				
2/2/2021	WELL I3		0.0089	<	0.0005	<	0.0005		0.0008		0.0059		0.0006
2/2/2021	WELL I2		0.0038	<	0.0005		0.0110	<	0.0005		0.0013	<	0.0005
1/13/2021	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
1/13/2021	A.S.T. 3		0.0032	<	0.0005		0.0021	<	0.0005		0.0039	<	0.0005
1/5/2021	WELL I1		0.0013	<	0.0005	<	0.0005	<	0.0005		0.0044	<	0.0005
1/5/2021	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0020	<	0.0005
1/5/2021	WELL I4		0.0085	<	0.0005	<	0.0005		0.0007		0.0056		0.0004
1/5/2021	WELL I3		0.0035	<	0.0005		0.0084	<	0.0005		0.0012	<	0.0005
12/16/2020	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
12/16/2020	A.S.T. 2		0.0032	<	0.0005		0.0019	<	0.0005		0.0034	<	0.0005
12/8/2020	WELL I1		0.0016	<	0.0005	<	0.0005	<	0.0005		0.0046	<	0.0005
12/8/2020	WELL I4	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0020	<	0.0005
12/8/2020	WELL I2		0.0098		0.0005	<	0.0005		0.0008		0.0054		0.0004
12/8/2020	WELL I3		0.0044	<	0.0005		0.0080	<	0.0005		0.0013	<	0.0005
11/30/2020	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
11/30/2020	A.S.T. 2		0.0035	<	0.0005		0.0020	<	0.0005		0.0037	<	0.0005
10/6/2020	WELL I2		0.0017	<	0.0005	<	0.0005	<	0.0005		0.0038	<	0.0005
10/6/2020	WELL I4	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0020	<	0.0005
10/6/2020	WELL I1		0.0060	<	0.0005		0.0110	<	0.0005		0.0012	<	0.0005
9/30/2020	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
9/30/2020	A.S.T. 3		0.0025	<	0.0005		0.0030	<	0.0005		0.0029	<	0.0005
9/16/2020	WELL I4		0.0016	<	0.0005	<	0.0005	<	0.0005		0.0037	<	0.0005
9/16/2020	WELL I1	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0020	<	0.0005
9/16/2020	WELL I2		0.0058	<	0.0005	<	0.0005	<	0.0005		0.0012	<	0.0005
8/19/2020	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
8/19/2020	A.S.T. 2		0.0024	<	0.0005		0.0035	<	0.0005		0.0025	<	0.0005
8/6/2020	WELL I2		0.0016	<	0.0005	<	0.0005	<	0.0005		0.0036	<	0.0005
8/6/2020	WELL I1	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0018	<	0.0005
8/6/2020	WELL I4		0.0050	<	0.0005		0.0120	<	0.0005		0.0009	<	0.0005
7/31/2020	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
7/31/2020	A.S.T. 3		0.0026	<	0.0005		0.0037	<	0.0005		0.0026	<	0.0005
7/14/2020	WELL I1		0.0017	<	0.0005	<	0.0005	<	0.0005		0.0051	<	0.0005
7/14/2020	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0027	<	0.0005
7/14/2020	WELL I4		0.0044	<	0.0005		0.0110	<	0.0005		0.0013	<	0.0005
6/29/2020	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
6/29/2020	A.S.T. 3		0.0018	<	0.0005		0.0029	<	0.0005		0.0029	<	0.0005
6/25/2020	WELL I2		0.0014	<	0.0005	<	0.0005	<	0.0005		0.0047	<	0.0005
6/25/2020	WELL I4	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0022	<	0.0005
6/25/2020	WELL I1		0.0033	<	0.0005		0.0096	<	0.0005		0.0009	<	0.0005
5/29/2020	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
5/29/2020	A.S.T. 2		0.0010	<	0.0005		0.0026	<	0.0005		0.0023	<	0.0005



## Air Stripper Tower and Interceptor Well Data

Date	Wellfield	Dichloroethene(c-1,2)	Dichloroethene(t-1,2)	Tetrachloroethene	Trichloroethane(1,1,1)	Trichloroethene	Vinylchloride						
5/20/2020	WELL I4	0.0008	<	0.0005	<	0.0005	<	0.0005					
5/20/2020	WELL I2	0.0018	<	0.0005	<	0.0074	<	0.0005					
3/3/2020	WELL I4	0.0011	<	0.0005	<	0.0005	<	0.0005					
3/3/2020	WELL I3	<	0.0005	<	0.0005	<	0.0005	<	0.0005				
3/3/2020	WELL I1	0.0052	<	0.0005	<	0.0007	<	0.0005	<	0.0005			
3/3/2020	WELL I2	0.0025	<	0.0005	<	0.0094	<	0.0005	<	0.0005			
2/12/2020	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005		
2/12/2020	A.S.T. 3	0.0007	<	0.0005	<	0.0005	<	0.0005	<	0.0039	<	0.0005	
2/4/2020	WELL I1	0.0007	<	0.0005	<	0.0005	<	0.0005	<	0.0040	<	0.0005	
2/4/2020	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0020	<	0.0005
2/4/2020	WELL I3	0.0043	<	0.0005	<	0.0007	<	0.0005	<	0.0043	<	0.0005	
2/4/2020	WELL I4	0.0022	<	0.0005	<	0.0089	<	0.0005	<	0.0008	<	0.0005	
1/15/2020	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
1/15/2020	A.S.T. 2	0.0018	<	0.0005	<	0.0031	<	0.0005	<	0.0029	<	0.0005	
1/7/2020	WELL I1	0.0010	<	0.0005	<	0.0005	<	0.0005	<	0.0047	<	0.0005	
1/7/2020	WELL I4	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0026	<	0.0005
1/7/2020	WELL I2	0.0050	<	0.0005	<	0.0007	<	0.0006	<	0.0049	<	0.0005	
1/7/2020	WELL I3	0.0026	<	0.0005	<	0.0100	<	0.0005	<	0.0008	<	0.0005	
12/11/2019	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
12/11/2019	A.S.T. 1	0.0020	<	0.0005	<	0.0005	<	0.0005	<	0.0046	<	0.0005	
11/27/2019	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
11/27/2019	A.S.T. 1	0.0020	<	0.0005	<	0.0016	<	0.0005	<	0.0040	<	0.0005	
11/27/2019	A.S.T. 1	0.0020	<	0.0005	<	0.0016	<	0.0005	<	0.0040	<	0.0005	
11/19/2019	WELL I1	0.0009	<	0.0005	<	0.0005	<	0.0005	<	0.0042	<	0.0005	
11/19/2019	WELL I3	<	0.0005	<	0.0005	<	0.0007	<	0.0005	<	0.0023	<	0.0005
11/19/2019	WELL I4	0.0040	<	0.0005	<	0.0007	<	0.0005	<	0.0042	<	0.0005	
11/19/2019	WELL I2	0.0018	<	0.0005	<	0.0100	<	0.0005	<	0.0006	<	0.0005	
10/18/2019	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
10/18/2019	A.S.T. 2	0.0021	<	0.0005	<	0.0014	<	0.0005	<	0.0044	<	0.0005	
10/16/2019	WELL I1	0.0010	<	0.0005	<	0.0005	<	0.0005	<	0.0045	<	0.0005	
10/16/2019	WELL I4	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0032	<	0.0005
10/16/2019	WELL I3	0.0052	<	0.0005	<	0.0006	<	0.0007	<	0.0049	<	0.0005	
10/16/2019	WELL I2	0.0021	<	0.0005	<	0.0098	<	0.0005	<	0.0007	<	0.0005	
9/10/2019	WELL I2	0.0015	<	0.0005	<	0.0005	<	0.0005	<	0.0043	<	0.0005	
9/10/2019	WELL I4	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0025	<	0.0005
9/10/2019	WELL I3	0.0061	<	0.0005	<	0.0006	<	0.0006	<	0.0050	<	0.0005	
9/10/2019	WELL I1	0.0034	<	0.0005	<	0.0140	<	0.0005	<	0.0007	<	0.0005	
8/7/2019	WELL I2	0.0018	<	0.0005	<	0.0005	<	0.0005	<	0.0057	<	0.0005	
8/7/2019	WELL I1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0027	<	0.0005
8/7/2019	WELL I4	0.0066	<	0.0005	<	0.0005	<	0.0006	<	0.0054	<	0.0005	
8/7/2019	WELL I3	0.0023	<	0.0005	<	0.0120	<	0.0005	<	0.0007	<	0.0005	
7/30/2019	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0025	<	0.0005
7/24/2019	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005



## Air Stripper Tower and Interceptor Well Data

Date	Wellfield	Dichloroethene(c-1,2)	Dichloroethene(t-1,2)	Tetrachloroethene	Trichloroethane(1,1,1)	Trichloroethene	Vinylchloride				
7/24/2019	A.S.T. 3	0.0023	<	0.0005	0.0013	<	0.0005	0.0046	<	0.0005	
7/16/2019	WELL I1	0.0011	<	0.0005	<	0.0005	<	0.0005	0.0053	<	0.0005
7/16/2019	WELL I3	0.0049	<	0.0005	0.0006		0.0005	0.0047	<	0.0005	
7/16/2019	WELL I4	0.0013	<	0.0005	0.0110	<	0.0005	0.0006	<	0.0005	
6/14/2019	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
6/14/2019	A.S.T. 1	0.0016	<	0.0005	0.0012	<	0.0005	0.0037	<	0.0005	
6/11/2019	WELL I3	0.0006	<	0.0005	0.0045	<	0.0005	<	0.0005	<	0.0005
6/11/2019	WELL I1	0.0042	<	0.0005	0.0006	<	0.0005	0.0044	<	0.0005	
6/11/2019	WELL I4	0.0009	<	0.0005	0.0091	<	0.0005	<	0.0005	<	0.0005
5/24/2019	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
5/24/2019	A.S.T. 1	0.0017	<	0.0005	0.0011	<	0.0005	0.0033	<	0.0005	
5/21/2019	WELL I4	0.0007	<	0.0005	0.0005	<	0.0005	0.0040	<	0.0005	
5/21/2019	WELL I3	<	0.0005	<	0.0005	<	0.0005	0.0021	<	0.0005	
5/21/2019	WELL I2	0.0051	<	0.0005	0.0006	<	0.0005	0.0047	<	0.0005	
5/21/2019	WELL I1	0.0009	<	0.0005	0.0078	<	0.0005	0.0005	<	0.0005	
5/1/2019	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
5/1/2019	A.S.T. 3	0.0025	<	0.0005	0.0015	<	0.0005	0.0043	<	0.0005	
4/23/2019	WELL I1	0.0010	<	0.0005	0.0005	<	0.0005	0.0049	<	0.0005	
4/23/2019	WELL I4	<	0.0005	<	0.0005	<	0.0005	0.0021	<	0.0005	
4/23/2019	WELL I3	0.0056	<	0.0005	0.0006		0.0006	0.0049	<	0.0005	
4/23/2019	WELL I2	0.0016	<	0.0005	0.0110	<	0.0005	0.0006	<	0.0005	
3/15/2019	A.S.T. 2	0.0030	<	0.0005	0.0014	<	0.0005	0.0043	<	0.0005	
3/12/2019	WELL I4	0.0014	<	0.0005	0.0005	<	0.0005	0.0050	<	0.0005	
3/12/2019	WELL I1	<	0.0005	<	0.0005	<	0.0005	0.0023	<	0.0005	
3/12/2019	WELL I2	0.0069	<	0.0005	0.0006		0.0006	0.0050	<	0.0005	
2/15/2019	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
2/15/2019	A.S.T. 1	0.0023	<	0.0005	0.0014	<	0.0005	0.0045	<	0.0005	
2/13/2019	WELL I1	0.0014	<	0.0005	0.0005	<	0.0005	0.0054	<	0.0005	
2/13/2019	WELL I2	<	0.0005	<	0.0005	<	0.0005	0.0032	<	0.0005	
2/13/2019	WELL I3	0.0069	<	0.0005	0.0006		0.0007	0.0058	<	0.0005	
2/13/2019	WELL I4	0.0027	<	0.0005	0.0140	<	0.0005	0.0008	<	0.0005	
1/9/2019	WELL I2	0.0014	<	0.0005	0.0005	<	0.0005	0.0056	<	0.0005	
1/9/2019	WELL I4	<	0.0005	<	0.0005	<	0.0005	0.0034	<	0.0005	
1/9/2019	WELL I3	0.0058	<	0.0005	0.0005		0.0007	0.0052	<	0.0005	
1/9/2019	WELL I1	0.0018	<	0.0005	0.0093	<	0.0005	0.0006	<	0.0005	
12/21/2018	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
12/21/2018	A.S.T. 2	0.0023	<	0.0005	0.0012	<	0.0005	0.0049	<	0.0005	
12/4/2018	WELL I4	0.0014	<	0.0005	0.0005	<	0.0005	0.0055	<	0.0005	
12/4/2018	WELL I2	<	0.0005	<	0.0005	<	0.0005	0.0043	<	0.0005	
12/4/2018	WELL I3	0.0052	<	0.0005	0.0005		0.0006	0.0050	<	0.0005	
12/4/2018	WELL I1	0.0015	<	0.0005	0.0087	<	0.0005	0.0007	<	0.0005	
11/30/2018	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
11/30/2018	A.S.T. 1	0.0020	<	0.0005	0.0011	<	0.0005	0.0052	<	0.0005	

## Air Stripper Tower and Interceptor Well Data

Date	Wellfield	Dichloroethene(c-1,2)	Dichloroethene(t-1,2)	Tetrachloroethene	Trichloroethane(1,1,1)	Trichloroethene	Vinylchloride						
11/27/2018	WELL I1	0.0014	<	0.0005	<	0.0005	<	0.0005					
11/27/2018	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005				
11/27/2018	WELL I3	0.0050	<	0.0005		0.0005	<	0.0005	0.0054	<	0.0005		
11/27/2018	WELL I4	0.0014	<	0.0005		0.0090	<	0.0005		0.0006	<	0.0005	
11/5/2018	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
11/5/2018	A.S.T. 3		0.0019	<	0.0005		0.0010	<	0.0005		0.0053	<	0.0005
10/17/2018	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
10/17/2018	A.S.T. 3		0.0014	<	0.0005		0.0010	<	0.0005		0.0046	<	0.0005
10/2/2018	WELL I4		0.0013	<	0.0005	<	0.0005	<	0.0005		0.0064	<	0.0005
10/2/2018	WELL I3	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0055	<	0.0005
10/2/2018	WELL I1		0.0043	<	0.0005		0.0006		0.0007		0.0057	<	0.0005
10/2/2018	WELL I2		0.0006	<	0.0005		0.0079	<	0.0005		0.0006	<	0.0005
9/28/2018	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
9/28/2018	A.S.T. 2		0.0018	<	0.0005		0.0011	<	0.0005		0.0051	<	0.0005
9/21/2018	WELL I1		0.0011	<	0.0005	<	0.0005	<	0.0005		0.0056	<	0.0005
9/21/2018	WELL I4	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0050	<	0.0005
9/21/2018	WELL I3		0.0038	<	0.0005		0.0006		0.0006		0.0049	<	0.0005
9/21/2018	WELL I2		0.0005	<	0.0005		0.0077	<	0.0005		0.0005	<	0.0005
8/7/2018	WELL I1		0.0015	<	0.0005	<	0.0005	<	0.0005		0.0055	<	0.0005
8/7/2018	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0050	<	0.0005
8/7/2018	WELL I3		0.0062	<	0.0005		0.0005		0.0007		0.0054	<	0.0005
8/7/2018	WELL I4		0.0014	<	0.0005		0.0113	<	0.0005		0.0007	<	0.0005
7/13/2018	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
7/13/2018	A.S.T. 3		0.0017	<	0.0005		0.0011	<	0.0005		0.0040	<	0.0005
7/10/2018	WELL I1		0.0008	<	0.0005	<	0.0005	<	0.0005		0.0042	<	0.0005
7/10/2018	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0033	<	0.0005
7/10/2018	WELL I3		0.0042	<	0.0005		0.0007		0.0005		0.0046	<	0.0005
7/10/2018	WELL I4		0.0008	<	0.0005		0.0084	<	0.0005	<	0.0005	<	0.0005
6/19/2018	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
6/19/2018	A.S.T. 2		0.0011	<	0.0005		0.0009	<	0.0005		0.0032	<	0.0005
6/12/2018	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0031	<	0.0005
6/12/2018	WELL I1	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0023	<	0.0005
6/12/2018	WELL I4		0.0033	<	0.0005	<	0.0005	<	0.0005		0.0041	<	0.0005
6/12/2018	WELL I3	<	0.0005	<	0.0005		0.0058	<	0.0005	<	0.0005	<	0.0005
5/24/2018	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
5/24/2018	A.S.T. 2		0.0013	<	0.0005		0.0010	<	0.0005		0.0030	<	0.0005
5/22/2018	WELL I4	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0032	<	0.0005
5/22/2018	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0024	<	0.0005
5/22/2018	WELL I3		0.0041	<	0.0005	<	0.0005	<	0.0005		0.0045	<	0.0005
5/22/2018	WELL I1		0.0007	<	0.0005		0.0076	<	0.0005		0.0006	<	0.0005
4/13/2018	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
4/13/2018	A.S.T. 3		0.0020	<	0.0005		0.0013	<	0.0005		0.0042	<	0.0005
4/11/2018	WELL I3		0.0011	<	0.0005	<	0.0005	<	0.0005		0.0047	<	0.0005

## Air Stripper Tower and Interceptor Well Data

Date	Wellfield	Dichloroethene(c-1,2)	Dichloroethene(t-1,2)	Tetrachloroethene	Trichloroethane(1,1,1)	Trichloroethene	Vinylchloride						
4/11/2018	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0027	<	0.0005		
4/11/2018	WELL I1		0.0056	<	0.0005	<	0.0005	<	0.0005	<	0.0005		
4/11/2018	WELL I4		0.0011	<	0.0005		0.0091	<	0.0005		0.0006	<	0.0005
3/14/2018	WELL I1		0.0006	<	0.0005	<	0.0005	<	0.0005		0.0034	<	0.0005
3/9/2018	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
3/9/2018	A.S.T. 2		0.0017	<	0.0005		0.0012	<	0.0005		0.0031	<	0.0005
3/7/2018	WELL I3	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0014	<	0.0005
3/7/2018	WELL I4		0.0055	<	0.0005		0.0005	<	0.0005		0.0035	<	0.0005
3/7/2018	WELL I2		0.0013	<	0.0005		0.0093	<	0.0005	<	0.0005	<	0.0005
2/16/2018	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
2/16/2018	A.S.T. 2		0.0026	<	0.0005		0.0018	<	0.0005		0.0046	<	0.0005
2/13/2018	WELL I3		0.0014	<	0.0005	<	0.0005	<	0.0005		0.0054	<	0.0005
2/13/2018	WELL I4	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0032	<	0.0005
2/13/2018	WELL I2		0.0079	<	0.0005	<	0.0005	<	0.0005		0.0066	<	0.0005
2/13/2018	WELL I1		0.0024	<	0.0005		0.0120	<	0.0005		0.0009	<	0.0005
1/10/2018	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
1/10/2018	A.S.T. 1		0.0028	<	0.0005		0.0018	<	0.0005		0.0044	<	0.0005
1/9/2018	WELL I4		0.0016	<	0.0005	<	0.0005	<	0.0005		0.0051	<	0.0005
1/9/2018	WELL I1	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0032	<	0.0005
1/9/2018	WELL I2		0.0078	<	0.0005		0.0006		0.0007		0.0061	<	0.0005
1/9/2018	WELL I3		0.0022	<	0.0005		0.0120	<	0.0005		0.0009	<	0.0005
12/19/2017	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
12/19/2017	A.S.T. 3		0.0031	<	0.0005		0.0022	<	0.0005		0.0046	<	0.0005
12/5/2017	WELL I1		0.0010	<	0.0005	<	0.0005	<	0.0005		0.0054	<	0.0005
12/5/2017	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0030	<	0.0005
12/5/2017	WELL I3		0.0075	<	0.0005		0.0007		0.0007		0.0065	<	0.0005
12/5/2017	WELL I4		0.0022	<	0.0005		0.0120	<	0.0005		0.0011	<	0.0005
11/22/2017	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
11/22/2017	A.S.T. 2		0.0021	<	0.0005		0.0019	<	0.0005		0.0037	<	0.0005
11/21/2017	WELL I3		0.0007	<	0.0005	<	0.0005	<	0.0005		0.0040	<	0.0005
11/21/2017	WELL I1	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0025	<	0.0005
11/21/2017	WELL I4		0.0064	<	0.0005		0.0006		0.0005		0.0055	<	0.0005
11/21/2017	WELL I2		0.0016	<	0.0005		0.0100	<	0.0005		0.0009	<	0.0005
10/11/2017	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
10/11/2017	A.S.T. 1		0.0039	<	0.0005		0.0020	<	0.0005		0.0048	<	0.0005
10/10/2017	WELL I4		0.0016	<	0.0005	<	0.0005	<	0.0005		0.0052	<	0.0005
10/10/2017	WELL I2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
10/10/2017	WELL I3		0.0100		0.0006		0.0005		0.0009		0.0076	<	0.0005
10/10/2017	WELL I1		0.0047	<	0.0005		0.0140	<	0.0005		0.0013	<	0.0005
9/13/2017	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
9/13/2017	A.S.T. 3		0.0038	<	0.0005		0.0021	<	0.0005		0.0042	<	0.0005
9/12/2017	WELL I2		0.0016	<	0.0005	<	0.0005	<	0.0005		0.0048	<	0.0005
9/12/2017	WELL I1	<	0.0005	<	0.0005	<	0.0005	<	0.0005		0.0032	<	0.0005

## Air Stripper Tower and Interceptor Well Data

Date	Wellfield	Dichloroethene(c-1,2)	Dichloroethene(t-1,2)	Tetrachloroethene	Trichloroethane(1,1,1)	Trichloroethene	Vinylchloride				
9/12/2017	WELL I4	0.0110	0.0006	<	0.0005	<	0.0005	0.0072	<	0.0006	
9/12/2017	WELL I3	0.0052	<	0.0005	0.0130	<	0.0005	0.0014	<	0.0005	
8/9/2017	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
8/9/2017	A.S.T. 2	0.0041	<	0.0005	0.0023	<	0.0005	0.0045	<	0.0005	
8/8/2017	WELL I1	0.0017	<	0.0005	0.0005	<	0.0005	0.0047	<	0.0005	
8/8/2017	WELL I2	<	0.0005	<	0.0005	<	0.0005	0.0031	<	0.0005	
8/8/2017	WELL I4	0.0052	<	0.0005	0.0120	<	0.0005	0.0013	<	0.0005	
7/21/2017	A.S.T. 2	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
7/21/2017	A.S.T. 2	0.0041	<	0.0005	0.0023	<	0.0005	0.0043	<	0.0005	
7/19/2017	WELL I1	0.0016	<	0.0005	0.0005	<	0.0005	0.0051	<	0.0005	
7/19/2017	WELL I2	<	0.0005	<	0.0005	<	0.0005	0.0029	<	0.0005	
7/19/2017	WELL I3	0.0100	0.0006	0.0005	0.0005	0.0009	0.0073	<	0.0005		
7/19/2017	WELL I4	0.0049	<	0.0005	0.0120	<	0.0005	0.0012	<	0.0005	
7/5/2017	WELL I4	0.0049	<	0.0005	0.0130	<	0.0005	0.0012	<	0.0005	
7/5/2017	WELL I1	<	0.0005	<	0.0005	<	0.0005	0.0026	<	0.0005	
7/5/2017	WELL I3	0.0098	0.0006	<	0.0005	0.0007	0.0066	0.0066	0.0066	0.0066	
7/5/2017	WELL I2	0.0016	<	0.0005	0.0005	<	0.0005	0.0050	<	0.0005	
6/27/2017	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
6/27/2017	A.S.T. 1	0.0038	<	0.0005	0.0025	<	0.0005	0.0041	<	0.0005	
6/27/2017	WELL I1	0.0016	<	0.0005	0.0005	<	0.0005	0.0052	<	0.0005	
6/27/2017	WELL I2	<	0.0005	<	0.0005	<	0.0005	0.0022	<	0.0005	
6/27/2017	WELL I3	0.0091	0.0005	0.0005	0.0005	0.0008	0.0063	<	0.0005		
6/27/2017	WELL I4	0.0044	<	0.0005	0.0120	<	0.0005	0.0011	<	0.0005	
6/6/2017	WELL I4	0.0013	<	0.0005	0.0005	<	0.0005	0.0064	<	0.0005	
6/6/2017	WELL I3	<	0.0005	<	0.0005	<	0.0005	0.0012	<	0.0005	
6/6/2017	WELL I1	0.0082	0.0006	0.0007	0.0007	0.0008	0.0066	<	0.0005		
6/6/2017	WELL I2	0.0036	<	0.0005	0.0120	<	0.0005	0.0012	<	0.0005	
5/10/2017	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
5/10/2017	A.S.T. 3	0.0015	<	0.0005	0.0026	<	0.0005	0.0046	<	0.0005	
5/9/2017	WELL I4	0.0011	<	0.0005	0.0005	<	0.0005	0.0058	<	0.0005	
5/9/2017	WELL I1	0.0018	<	0.0005	0.0090	<	0.0005	0.0008	<	0.0005	
4/10/2017	WELL I2	<	0.0005	<	0.0005	<	0.0005	0.0059	<	0.0005	
4/10/2017	WELL I4	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
4/10/2017	WELL I1	0.0013	<	0.0005	0.0088	<	0.0005	0.0007	<	0.0005	
3/8/2017	A.S.T. 1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
3/8/2017	A.S.T. 1	0.0040	<	0.0005	0.0022	<	0.0005	0.0056	<	0.0005	
3/7/2017	WELL I4	0.0013	<	0.0005	0.0005	<	0.0005	0.0065	<	0.0005	
3/7/2017	WELL I1	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
3/7/2017	WELL I3	0.0088	0.0006	<	0.0005	0.0009	0.0078	<	0.0005		
3/7/2017	WELL I2	0.0025	<	0.0005	0.0100	<	0.0005	0.0012	<	0.0005	
2/8/2017	A.S.T. 3	<	0.0005	<	0.0005	<	0.0005	<	0.0005	<	0.0005
2/8/2017	A.S.T. 3	0.0039	<	0.0005	0.0024	<	0.0005	0.0062	<	0.0005	
2/7/2017	WELL I4	0.0017	<	0.0005	0.0005	<	0.0005	0.0082	<	0.0005	

## Air Stripper Tower and Interceptor Well Data

Date	Wellfield	Dichloroethene(c-1,2)	Dichloroethene(t-1,2)	Tetrachloroethene	Trichloroethane(1,1,1)	Trichloroethene	Vinylchloride
2/7/2017	WELL I1	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005
2/7/2017	WELL I2	0.0092	0.0008	< 0.0005	0.0010	0.0084	0.0005
2/7/2017	WELL I3	0.0026	< 0.0005	0.0110	< 0.0005	0.0015	< 0.0005
1/11/2017	A.S.T. 2	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005
1/11/2017	A.S.T. 2	0.0046	< 0.0005	0.0036	< 0.0005	0.0074	< 0.0005
1/10/2017	WELL I4	0.0081	< 0.0005	< 0.0005	< 0.0005	0.0081	< 0.0005
1/10/2017	WELL I1	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005	< 0.0005
1/10/2017	WELL I2	< 0.0005	0.0008	0.0006	0.0012	0.0076	< 0.0005
1/10/2017	WELL I3	0.0035	< 0.0005	0.0140	< 0.0005	0.0012	< 0.0005

**APPENDIX D**

**NEWSPAPER ARTICLE WITH FYR PUBLIC NOTICE**



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The Elkhart Truth is a trusted provider of information across multiple platforms, providing readers with timely news about their community in a responsible and accurate fashion, serving as a forum for public debate and deliberation, creating community, and acting as a bridge between businesses and their customers.

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### LOTTERIES

**Thursday drawings**  
Michigan

**Poker Lotto**  
JD-9C-8D-9D-5S  
**Midday Daily 3**  
4-9-9  
**Midday Daily 4**  
6-8-5-6  
**Daily 3**  
8-0-2  
**Daily 4**  
7-7-3-3  
**Fantasy 5**  
08-15-17-29-38  
**Keno**  
03-09-10-11-13-17-18-22-23-25-29-37-48-51-53-57-60-67-68-69-70-73  
Indiana  
**Quick Draw Midday**  
02-06-07-10-11-12-16-20-27-29-30-36-41-50-55-61-67-68-73-74, BE: 6  
**Daily Three-Midday**  
1-8-8, SB: 0  
**Daily Four-Midday**  
6-9-2-1, SB: 0

**Wednesday drawings**  
Indiana

**Cash 5**  
21-22-31-38-41  
**Cash4Life**  
17-21-22-28-44, Cash Ball: 3  
**Lotto Plus**  
22-23-25-27-39-46  
**Daily Three-Evening**  
4-2-0, SB: 8  
**Daily Four-Evening**  
0-5-3-5, SB: 8  
**Quick Draw Evening**  
01-08-09-13-14-17-23-25-31-37-44-45-49-53-55-59-64-69-70-76, BE: 1  
**Hoosier Lotto**  
05-19-24-33-41-44  
**Powerball**  
18-29-33-62-63, Powerball: 15, Power Play: 3



Alex Brandon / AP

President Joe Biden waves as he steps off Air Force One upon arrival, at John F. Kennedy Airport Thursday in the Queens Borough of New York.

## U.S. says new intel shows Russia plotting false flag attack

By **AAMER MADHANI, LORNE COOK and SUZAN FRASER**  
Associated Press

WASHINGTON — The U.S. accused the Kremlin on Thursday of an elaborate plot to fabricate an attack by Ukrainian forces that Russia could use as a pretext to take military action against its neighbor.

Pentagon spokesman John Kirby said the scheme included production of a graphic propaganda video that would show staged explosions and

use corpses and actors depicting grieving mourners.

The U.S. has not provided detailed information backing up the claims.

The plan for a fake attack on Russian territory or Russian-speaking people was described in declassified intelligence shared with Ukrainian officials and European allies in recent days. It was the latest example of the Biden administration divulging intelligence findings as a tactic to attempt to stop Russian disinformation efforts and foil what it says is Russian

President Vladimir Putin's effort to lay the groundwork for military action. If Russia does invade, administration officials say they want to make clear Russia had always sought to create a pretext.

In recent weeks, the White House has said that U.S. intelligence shows Russia has launched a malign social media disinformation campaign against Ukraine and has dispatched operatives trained in explosives to carry out acts of sabotage against Russia's own proxy forces.

## Biden in NYC: Nation must come together to end gun violence

By **JOSH BOAK, COLLEEN LONG and MICHELLE L. PRICE**  
Associated Press

NEW YORK — Running through a grim tally of recent gun deaths, President Joe Biden pledged to New Yorkers and the nation on Thursday that the federal government would step up

its fight against gun violence by working more closely with police and communities to stop the surging bloodshed.

"It's enough. Enough is enough," Biden told police, law enforcement officials and lawmakers gathered at the city's police headquarters. "We can do something about this."

But Biden's crimefighting strategy relies heavily on buy-in from state and local officials as he suggests ways to spend federal dollars and expands on initiatives already under way. The modest initiatives demonstrate the limits to what he can do when there is no appetite in Congress to pass gun legislation.



### EPA Begins Review Of the Main Street Well Field Superfund Site Elkhart, Indiana

U.S. Environmental Protection Agency is conducting a five-year review of the Main Street Well Field Superfund site located at 1120 N Main St., Elkhart, Ind. The Superfund law requires regular checkups of sites that have been cleaned up – with waste managed on-site – to make sure the cleanup continues to protect people and the environment. This is the sixth five-year review of this site.

EPA's cleanup of groundwater contamination from volatile organic compounds, including trichloroethylene, consisted of installing systems for groundwater extraction, air stripping and soil vapor extraction. Continued protectiveness requires operation and maintenance activities, including groundwater monitoring, and additional land use restrictions on one or two properties east of the well field. The review will check whether those requirements are being fulfilled.

More information is available at the Elkhart Public Library, 300 S. Second St.; and at <http://www.epa.gov/superfund/main-street-wellfield>  
The current five-year review should be completed by July 2022.

The five-year review is an opportunity for you to tell EPA about site conditions and any concerns you have. Contact:

**Janet Pope**  
Community Involvement  
Coordinator  
312-353-0628  
pope.janet@epa.gov

**Lolita Hill**  
Remedial Project Manager  
312-353-1621  
hill.lolita@epa.gov

You may also call EPA toll-free at 800-621-8431, 9:30 a.m. to 5:30 p.m., weekdays.

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