EXHITBIT 6

STOREHOUSE PHASE I SITE ASSESSMENT





Former Central State Storehouse

3302 Kirkbride Way Indianapolis, Marion County, Indiana

December 13, 2023



Prepared For:

The City of Indianapolis Department of Metropolitan Development

200 East Washington Street, Suite 2042 Indianapolis, Indiana 46204

Attn: Ms. Margarette Webb, Project Manager – Brownfield Redevelopment Program

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IWM Project No. IN23107.01

Former Central State Storehouse 3302 Kirkbride Way Indianapolis, Marion County, Indiana

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1.0 EXECUTIVE SUMMARY

IWM Consulting Group, LLC (IWM) was retained by Margarette Webb, Project Manager of Brownfield Redevelopment for the City of Indianapolis Department of Metropolitan Development (DMD) located at 200 East Washington Street, Suite 2042, Indianapolis Indiana, 46204 to complete a Phase I Environmental Site Assessment (Phase I ESA) of the property located at 3302 Kirkbride Way, Indianapolis, Marion County, Indiana (subject property).

IWM's Phase I ESA included a physical inspection of the subject property and visual observations of adjacent properties, as well as a review of available, pertinent environmental and historical records. Current and prior subject property usage was not investigated for indications of compliance with state and federal environmental regulations. IWM also conducted visual assessments for other potential environmental conditions.

The primary objective of this Phase I ESA was to identify the presence or likely presence of hazardous substances or petroleum products, as defined in the American Society for Testing and Materials (ASTM) Standard Practice E1527-21 (also E2247-16 where applicable), in, on, or at a subject property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

1.1 Summary of the Site Description

The subject property is located within a mixed commercial and semi-agriculturally developed area on the west side of Indianapolis and is situated on the north side of Kirkbride Way approximately 2.9 miles west of Monument Circle, Indianapolis' central business district. The eastern portion of the subject property is bordered by the Indiana Medical History Museum. The northern and western portions of the subject property are bordered by a horse pasture, used by the Indianapolis Metropolitan Police Department (IMPD) Mounted Police Unit. Kirkbride Way borders the southern portion of the subject property, followed by former Central State Powerhouse and stables occupied by the IMPD Mounted Patrol.

Access to the subject property is from Kirkbride Way located south of the subject property. The subject property consists of approximately 1.64 acres and is currently occupied by a vacant commercial building, totaling approximately 29,220 square feet of floor space. A paved parking lot is located on the southwest corner of the building, within the loading dock area. Grass and woods surround the parking lot and building. An aboveground storage tank (AST) was observed in the western portion of the subject property, on an apparent concrete berm surrounded by a chain link and barbed wire fence. The underground storage tank (UST) that was previously reported as removed was unable to be located; however, metal conduit pipes were observed protruding from



the ground which may have been from a fuel dispenser. The layout of the subject property, including the on-site building, is depicted **Figure 2**.

The L-shaped building is located on the northeastern corner of the subject property and contains approximately 29,220 square feet of floor space with a loading dock area on the southwestern portion of the building. According to information obtained from historical fire insurance maps, the building was built in 1955. Exterior construction consists of brick walls, concrete foundation, and an asphalt and river rock roof.

Refrigeration rooms were present throughout the building, which consist of concrete floors with drains, acrylic coated metal walls and ceilings used to retain cool temperature and enable easy cleaning, with ceiling mounted coolers.

Remaining rooms inside the building consisted of glazed tile walls, occasionally covered in Styrofoam and cork, concrete floors with ceramic and vinyl tiles, and ceiling tiles. The basement consisted of concrete and drywall walls and ceilings, and concrete floors.

Numerous floor drains were observed throughout the building. An elevator connecting the first floor and the basement was observed, along with coils and other electrical equipment that had been salvaged and left behind by illegal scrappers. A ladder enabling roof access was observed near the elevator on the first floor; however, due to safety concerns and evidence of damage, the ladder was not utilized and the roof was subsequently not inspected.

Signs of vagrants were observed. Several fires occurred throughout the building, with fire damage, ceiling collapse, and soot observed. Electrical equipment was observed in the basement, with a motor inside a containment and numerous connected pipes. Various light fixtures, both troffer style fluorescent lamp and metal halide style, which may be affixed with PCB-bearing ballasts were observed throughout the building, along with exit signs, thermostats, electrical panels, and electrical switches. Paint in poor condition from the fires was observed, and based on the age of construction, may contain lead. Asbestos containing pipe wrap was observed throughout the building and in noticeably poor condition. Additionally, other suspect ACM, in the form of resilient floorings, ceiling tiles, and mastics were observed. Further description of the subject property is provided in **Section 5.0**.

1.2 Summary of Findings and Opinions

Based on review of available documentation and physical inspection of the subject property, the following issues were identified as representing environmental concerns affecting, or having the potential of affecting, the subject property. An *Opinion* is provided following each identified *Finding*.



- 1. The subject property was identified in the State Brownfields, Institutional Control, and Underground Storage Tank (UST) databases as provided in the Environmental Data Resources, Inc. (EDR) Radius MapTM Report.
 - The subject property is included in the Environmental Restrictive Covenant (ERC) for the Central State Hospital complex restricting groundwater use. The impacted groundwater at the subject property is considered a Controlled Recognized Environmental Condition (CREC).
 - A gasoline UST was reportedly present on the subject property and removed prior to 2003. No closure documentation is available on the Indiana Department of Environmental Management (IDEM) Virtual File Cabinet (VFC). A geophysical survey conducted by Keramida in 2007 confirmed no UST was present. Minor detections of volatile organic compounds (VOCs) and polynuclear aromatic hydrocarbons (PAHs) were detected in soil samples collected from soil borings advanced near the area of the suspected UST were present at concentrations above laboratory detection limits, but well below historical and current regulatory screening levels.
- 2. A total of 35 appearances by approximately 15 addressed facilities were identified in the searched databases, within the target search distances from the subject property, as provided in the EDR Report. Portion of the Central State Hospital were mapped by EDR as being adjacent, or nearly adjacent, to the subject property, and listed on the following Federal and State databases:
 - Resource Conservation and Recovery Act (RCRA), FINDS, Echo, Industrial Waste, Manifest, and National Pollutant Discharge Elimination System (NPDES)
 - No violations recorded
 - UST, State Cleanup, and Brownfields/Institutional Control
 - O A UST Notification Form completed in 1986 identified ten (10) USTs on the Central State Hospital Campus, six (6) are unaccounted for. Based on the analytical results for the soil and groundwater samples collected from the adjacent properties associated with Central State Hospital, and numerous assessments previously performed, the unaccounted USTs are not considered a REC.
 - Releases from two (2) USTs was assigned Incident No. 200402088 within the State Cleanup Program. Based on analytical results from confirmation soil and groundwater samples collected during remediation activities between 2004 and 2007, the release(s) from the USTs are not considered to be RECs.
 - Central State Hospital has undergone numerous investigations which are discussed in forthcoming sections. The Site Status Letter issued by IDEM in April 2013 documenting lead and arsenic



concentrations in soil present at the Central State Hospital, and subsequent ERC restricting groundwater use is considered a CREC.

- 3. During site reconnaissance, a 500-gallon AST was observed on the west side of the parking lot, in a concrete berm surrounded by barbed wire and chain link fence. According to a Phase I ESA conducted by Keramida in 2007, the AST previously contained gasoline.
 - The AST and its reported contents of petroleum products is considered a REC.
- 4. Floor drains were observed throughout the interior of the subject property.
 - The presence of floor drains, coupled with lack of information regarding materials historically stored onsite during Central State Hospital operations constitutes a possible Vapor Encroachment Condition (VEC), which is by definition, a REC.
- 5. Deteriorating asbestos pipe insulation was observed throughout the building. Additional suspect asbestos containing materials (ACMs) were also observed throughout the building, including resilient floorings, ceiling tiles, and mastics. The presence of ACMs is a business environmental risk (BER).
 - In the event qualifying modifications to the subject property building are planned, state and federal regulations requiring an asbestos inspection be conducted prior to demolition or renovation activities, should be consulted.
- 6. The use of lead-based paint or sealers on buildings constructed prior to 1978 is presumed. Based on the age of the building, with a construction date circa 1956, the use or presence of lead-based paint is suspected. The potential presence of lead-based paint is a BER.
 - Applicable regulators should be contacted to verify requirements; and local, state, and federal regulations must be followed during maintenance, renovation, or demolition activities, to protect workers, occupants, and the subject property from contaminants associated with lead-based paints/sealers.
- 7. Various light fixtures, both troffer style fluorescent lamp and metal halide style, which may be affixed with PCB-bearing ballasts were observed throughout the building, along with exit signs, thermostats, electrical panels, and switches. The presence of these universal waste items is considered a BER.
 - Proper handling, disposal, and/or recycling of these universal waste items should be conducted to prevent potential exposure to polychlorinated biphenyls (PCBs), chlorofluorocarbons (CFC), tritium, or mercury.

1.3 Significant Data Gap Summary

According to ASTM Standard Practice E1527-21, a data gap is significant if it "affects the ability of the environmental professional to identify a recognized environmental condition." In



preparation of this Phase I ESA, data gaps, as defined by ASTM Practice E1527-21, were encountered:

- The local fire department did not provide information regarding the subject property in response to an information request, specifically the type of fire suppressant utilized in recent interior fires. (Section 5.3.3 and Section 6.4).
- Owner interview was not conducted (Section 6.1)
- Lack of information regarding the materials historically stored in building during Central State Hospital operations
- The subject property building's roof was not inspected due to safety concerns

In the opinion of the Environmental Professional, these limitations did not affect the overall interpretation of the data, prevent historic subject property usage from being determined, or reduce the capacity to identify RECs, and do not alter the conclusions of this report.

1.4 Summary of Conclusions and Opinions

IWM has performed a Phase I Environmental Site Assessment of the subject property located at 3302 Kirkbride Way in Indianapolis, Indiana, in conformance with the scope and limitations of ASTM Practice E1527-21. Any exceptions to, or deletions from, this practice are described in **Section 2.0** and **Section 7.2** of this report.

This assessment has revealed evidence of RECs, CRECs, and BERs in connection with the subject property, specifically:

- AST observed on the western portion of the subject property is a REC
- Possible VEC present on the subject property due to presence of floor drains, lack of information pertaining to the materials historically stored in the building, and the limited Phase II investigative work completed to date, is considered a REC by definition.
- Historical operations with documented residual soil and groundwater contamination resulting in an ERC is considered a CREC
- Deteriorated asbestos pipe wrap was observed throughout the building. Additional suspect ACMs were also observed throughout the building (resilient floorings, ceiling tiles, and mastics). The presence of ACM is considered a BER.
- Based on the age of construction and observed peeling paint, lead-based paint is possibly present within the building and is considered a BER.
- Regulated universal waste, in the form of light fixtures, both troffer-style and metal halide fixtures, along with exit signs, thermostats, electrical panels, and switches, were observed throughout the building. These universal waste components are considered to be a BER.



Additional details related to the findings, opinions and conclusions of this assessment are provided in **Section 7.0**.

Reliance on the contents of this report after 180 days is at the user's sole risk. Based on the earliest completion dates of the components listed in **Section 2.7**, **this Phase I ESA is viable through May 26, 2024**.



Project No. IN23107.01

2.0 Introduction

IWM was retained by Margarette Webb of the City of Indianapolis DMD to perform a Phase I Environmental Site Assessment, herein referred to as the "assessment", "environmental assessment", "ESA", "Phase I ESA", or similar term for the property located at 3302 Kirkbride Way in Indianapolis, Marion County, Indiana. Within this report, the subject property may also be referred to by the following: "site", "target property", "subject property", "property", or other similar terms. The site is depicted on the following maps: Site Location Map (Figure 1) and Site Area Map (Figure 2). Referenced maps are provided in Appendix A.

2.1 Property Location and Legal Description

The site property is located at 3302 Kirkbride Way in Indianapolis, Indiana, in the northwest 1/4 of the southwest 1/4 of Section 4, Township 15 North, Range 3 East of Marion County. Photographs taken during site reconnaissance, which depict portions of the subject property, are provided in Appendix B.

A legal description for the subject property was not provided by the User; however, some information concerning the subject property was obtained from the Marion County Geographic Information System (GIS) website. Based on a review of information provided within this website, the subject property consists of one (1) parcel described briefly in the following table. A copy of the available Property Record is provided in **Appendix C**.

Parcel Identification	Street Address	Brief Legal Description	Approximate Size (acres)
49-11-04-135-027.000-901	3302 Kirkbride Way	PT SW1/4 S4 T15N R3E COMM NW COR S1/4 S869.72' E467.80' TO P.O.B. N96.30' E260.40' S301.83' W264.61' N150.69' TO BEG 1.640 AC.	1.64

Within the *Parcel Report*, the owner of the subject property was identified as Dapper Brewing Company LLC, with the following contact information:

Dapper Brewing Company LLC 2505 N. Delaware Street Indianapolis, IN 46205

According to the Parcel Report, Dapper Brewing Company LLC acquired the facility on

¹ https://maps.indy.gov/MapIndy/



August 29, 2017 from Holladay Properties Central Greens.

2.2 Purpose

The purpose of this ESA was to determine the presence of "Recognized Environmental Conditions" (RECs) in connection with the subject property using an approach conforming to ASTM E1527-21.

Recognized Environmental Conditions (REC)

RECs are defined in ASTM E1527-21 as the "presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment."

The definition of a release under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) includes contamination that is the direct result of a release into the environment from a non-natural source that migrates into a building or structure. For the purposes of the ASTM E1527-21 practice, migrate and migration refers to the movement of hazardous substances or petroleum products in any form, including, for example, solid and liquid at the surface or subsurface, and vapor in the subsurface.

Controlled Recognized Environmental Conditions (CREC)

A REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g., property restrictions, activity and use limitations, institutional controls, or engineering controls) is defined as a controlled REC (CREC). A CREC shall be identified as a REC in the conclusions section of this report; however, the identification of a condition as a CREC does not imply that the environmental professional conducting the Phase I ESA has evaluated or confirmed the adequacy, implementation, or continued effectiveness of the required control that has been, or is intended to be, implemented.

<u>Historical Recognized Environmental Conditions (HREC)</u>

A CREC differs from a historical REC (HREC) in that a HREC refers to a past release of hazardous substances or petroleum products that has occurred in connection with the subject property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the subject property to any required controls.



De Minimis Condition

RECs include *hazardous substances* or *petroleum products*, even under conditions in compliance with laws, but do not include "*de minimis* conditions that generally do not present a material risk of harm to public health or the *environment* and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies." Conditions determined to be *de minimis* are not *RECs*.

2.3 Scope of Work

The Scope of Services included a review of historical records and regulatory database information, a reconnaissance of the site and adjoining properties, interviews (historical and with those currently familiar with the site, where available), and preparation of this report.

Records were reviewed given that they were "reasonably ascertainable." ASTM E1527-21 defines "reasonably ascertainable" as "information that is publicly available, obtainable from its source within reasonable time and cost restraints, and is practically reviewable." The document examination generally includes the following tasks (refer to the agreed-upon scope of work):

- At a minimum, review of historical aerial photographs, city directories, fire insurance maps, and topographic maps of the site and adjoining properties. If these are not available, the Report will include a statement regarding the lack of availability.
- Review of property title records if provided by the Client, or requested by the Client as a non-scope service (Section 2.4).
- Review of regulatory database provider report of federal, state, and local listings for the site and other properties/facilities found within the search distances specified by ASTM E1527-21.

The reconnaissance included the following tasks:

- Visual observations of the site to identify indications of RECs, such as above ground storage tanks (ASTs) and underground storage tanks (USTs), stained soil or floor areas, vegetative stress, filled areas, waste or material dumping.
- Interviews with available current owner(s) and/or key site manager(s), or other person(s) as designated by the owner(s) regarding the site's current and past uses and information of environmental significance.
- Inquiries to appropriate local government offices (e.g., Fire Department or Health Department).
- Observations of adjoining properties (from site boundaries and public rights-of-way).
- The standards included in ASTM E2247-16 (Standard Practices for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property) may be used to replace or supplement the reconnaissance procedures included in ASTM E1527-21, with or without reference within this report at the discretion of the Environmental Professional and depending upon the size and nature of the subject property.



Photographic documentation, which may include the use of handheld cameras and/or unmanned aerial vehicles, and site diagrams are required by the ASTM E1527-21 Standard. Photographs taken during site reconnaissance are selected for inclusion in the report at the discretion of the Environmental Professional. IWM has provided Site Maps and Site Photographs, included herein in **Appendix A** and **Appendix B** respectively.

Utilizing the information collected for the subject property during the Phase I ESA, a Tier 1 Vapor Encroachment Screening (VES) was conducted for the site according to guidance and processes provided in ASTM Designation E2600-22: Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions (ASTM E2600-22). The objective of a VES is to determine if a Vapor Encroachment Condition (VEC) exists or does not exist and provide information to support those conclusions. A VEC is defined by ASTM as the "presence or likely presence of chemical(s) of concern (COC) vapors in the vadose zone of the target property caused by the release of vapors from contaminated soil and/or groundwater on or near the target property as identified by the Tier 1 or Tier 2 procedures" presented in ASTM E2600-22.

2.4 Additional Non-Scope Considerations

Environmental issues or conditions may exist at a property that parties may wish to assess in connection with commercial real estate that are outside the scope of ASTM E1527-21 (non-scope considerations). Examples of non-scope considerations include, but are not limited to, asbestos containing buildings materials, radon, wetlands, lead-based paint, lead in drinking water, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological issues, indoor air quality unrelated to releases of hazardous substances or petroleum products into the environment, biological agents, mold, and high voltage power lines. These Business Environmental Risks (BERs) are defined within ASTM E1527-21 as "a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated... Consideration of business environmental risk issues may involve addressing one or more non-scope considerations." These non-scope issues or conditions can be assessed during the ESA at the request of the Client.

For this Phase I ESA, IWM has provided additional review to assess the potential BERs listed below, with descriptions of the respective findings in the referenced sections of this report.

List of Additional Non-Scope Services

Additional Service	ASTM Reference	Report Section
Asbestos-Containing Building Materials	E1527-21 (13.1.5.1)	Section 4.5.15
Lead-Based Paint	E1527-21 (13.1.5.9)	Section 4.5.16
Mold Growth Conditions	E1527-21 (13.1.5.11)	Section 4.5.17
Naturally Occurring Radon	E1527-21 (13.1.5.13)	Section 5.1.7



List of Additional Non-Scope Services

Additional Service	ASTM Reference	Report Section
Per- and poly-fluoroalkyl substances (PFAS)	E1527-21 (13.1.5.15)	Section 5.3.7
Wetlands	E1527-21 (13.1.5.16)	Section 5.1.6

Site-specific investigations, including sampling and laboratory analysis, for the topics identified above were not completed unless specifically described in the corresponding section. Readily available information sources, such as literature references, site reconnaissance observations, and/or age of on-site structures, were used to provide some insight into risks which may exist related to each of these service topics.

2.5 Limitations and Exceptions

Findings, conclusions, and recommendations referenced herein are based upon, and limited to, those observations made during the listed reconnaissance date.

The site area included in this Phase I ESA was based upon available property lines, site surveys, property plat maps, verbal descriptions provided to IWM by the Client, and/or field observations (roadways, utilities, mow lines, etc.) observed by IWM's representative during the site reconnaissance. The information regarding the adjoining properties was obtained by visual reconnaissance from the subject site and/or public roads, and information obtained from record reviews and interviews with representatives of the site owner.

Phase I ESAs are limited to specific inquiries and are based upon records, reviews, and opinions rather than invasive testing services. Therefore, IWM cannot eliminate uncertainty as to environmental conditions at the site. Nor can we represent that the site contains no *hazardous substances*, *petroleum products*, or other products or substances (or other latent conditions) beyond those identified or observed from this scope of work. Information in this report is based upon the site's current use(s) and information obtained prior to issuance of the final report. IWM does not warrant the accuracy of information obtained from interviewees or other third-party sources of information (such as other environmental firms, database companies or title companies).

Please note that no Phase I ESA can wholly eliminate uncertainty regarding the potential for *RECs* in connection with the site. Referring to the procedures in ASTM E1527-21 will reduce, but not eliminate, these uncertainties. It is possible, therefore, that all *RECs* or relevant environmental issues may not have been identified. The failure to discover these, using a reasonable and mutually agreed upon scope of services, does not guarantee the absence of such *RECs* or issues, but only that they were not found as a result of this assessment. The services herein are in no way to be construed or relied upon as a legal interpretation, opinion or advice.



2.6 Significant Assumptions

It is assumed that the Client has provided IWM with title and lien records, actual knowledge of environmental liens or activity and use limitations encumbering the property, any specialized knowledge or experience material to recognized environmental conditions in connection with the property, any commonly known or reasonably ascertainable information material to recognized environmental conditions on the property, and the reason why the property may have a significantly lower purchase price than comparable properties, if applicable (User Responsibilities, ASTM E1527-21, Section 6.0). It is further assumed that the Client will read this report in its entirety (text and attachments) before making decisions based on the findings of the report.

2.7 Standard of Care and Viability

These Phase I ESA services were performed in a manner consistent with good commercial and customary standards and practices as applied by other consultants conducting similar investigations in the same geographic area during the same time period. No other warranties, express or implied, are intended or made.

Within ASTM E1527-21, Section 4.6.1, a Phase I ESA is considered viable when it is completed within 180 days prior to the date of acquisition of the subject property (or, for transactions not involving an acquisition such as a lease or refinance, the date of such transaction), subject to the limitations expressed herein. If the acquisition or transaction takes place more than 180 days and less than one year from date of completion of the following assessment components, these components may be updated:

- interviews with owners, operators, and occupants (Section 6.0);
- signed *User Questionnaire* and searches for recorded environmental cleanup liens (Section 3.0 and Section 5.0);
- reviews of federal, tribal, state, and local government records (Section 5.0);
- visual inspections of the subject property and adjoining properties (Section 4.0); and,
- declaration by the environmental professional responsible for the assessment or update (Section 8.0).

Reliance on the contents of this report after 180 days is at the user's sole risk. Based on the earliest completion dates of the components listed above, as reflected within the corresponding sections of the report, that being the signed *User Questionnaire* date of November 28, 2023 discussed in Section 3.0, this Phase I ESA is viable through May 26, 2024.



2.8 User/Client Reliance

Unless otherwise agreed, this Phase I ESA was prepared for the exclusive use and reliance of the City of Indianapolis Department of Metropolitan Development (DMD), and any third party authorized by the City of Indianapolis DMD and IWM. Any use of this Phase I ESA or the information contained herein by persons or entities other than the Client (without the express written consent of the Client and IWM) will be at the sole risk and liability of such persons and entities.



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3.0 USER PROVIDED INFORMATION

The U.S. EPA's All Appropriate Inquiry (AAI) rules places emphasis on "User" obligations. As specified in the ASTM E1527-21 standard, certain responsibilities lie with the "user" of the assessment, who is defined as "the party seeking to use Practice E1527 to complete an *environmental site assessment* of the subject property" and may include, without limitation, a potential purchaser, an owner, a lender, a property manager, or a potential tenant of the subject property. The User has specific obligations for completing a successful application of the ASTM E1527-21 practice for performing certain tasks that will help identify the possibility of *RECs* in connection with the property that do not require the technical expertise of an *environmental professional*. The required tasks/information include:

- (1) a search for environmental liens and AULs filed or recorded against the subject property, or communication to the environmental professional of the actual knowledge of such instruments;
- (2) specialized knowledge or experience related to the property or nearby property;
- (3) relationship of the purchase price being paid for the property to the fair market value, if not contaminated;
- (4) commonly known or reasonably ascertainable information about the property; and,
- (5) any obvious indications pointing to the presence, or likely presence, of contamination at the property.

Although the AAI Rules and ASTM E1527-21 do not require the *User* to share this information with the *environmental professional*, failure to provide this information could result in a determination that "all appropriate inquiry" is not complete.

A Phase I ESA *User Questionnaire* was provided to Margarette Webb, Project Manager of Brownfield Redevelopment for The City of Indianapolis DMD (User). The responses provided by Ms. Webb in the completed *User Questionnaire* are summarized in the following section. A copy of the completed questionnaire is provided in **Appendix D**. Documentation may also be found where referenced in this report. Note, the User was not the owner of the subject property at the time this Phase I ESA was completed.

3.1 Title Records

Ms. Webb (User) did not provide title record information. However, as discussed in **Section 2.1**, some property information for the subject property was obtained through public records.

3.2 Environmental Liens and Activity and Use Limitations (AULs)

Based on the response to *Questions 2 and 3* provided in the *User Questionnaire*, Ms. Webb was not aware of environmental liens or AULs associated with the subject property.



3.3 Specialized Knowledge or Experience of the User

Based on the response to *Question 4* provided in the *User Questionnaire*, Ms. Webb indicated she does not have specialized knowledge or experience regarding *recognized environmental conditions* associated with the subject property or nearby properties.

3.4 Significant Valuation Reductions for Environmental Issues

Based on the response provided to *Question 5* in the *User Questionnaire*, Ms. Webb indicated: "…I have no reason to believe the purchase price for the subject property has been reduced in comparison to the fair market value due to contamination known or believed to be present at the property."

3.5 Commonly Known or Reasonably Ascertainable Information.

Based on the response provided for *Question 6* in the *User Questionnaire*, Ms. Webb indicated she is aware the subject property was previously utilized as a storage facility for the Central State Asylum; however, she was not aware of commonly known or reasonably ascertainable information about the subject property that would help identify conditions indicative of release or threatened releases of hazardous substances or petroleum products.

3.6 Degree of Obviousness of Contamination

Based on the response provided to *Question 7* in the *User Questionnaire*, Ms. Webb did not have knowledge of any obvious indicators that point to the presence or likely presence of contamination at the subject property.

3.7 Available Previous Environmental Reports or Additional User Provided Information

Ms. Webb indicated a Phase I ESA was previously conducted in September 2022.

Previous investigations of the subject property and adjacent properties included in the Former Central State Hospital Complex were performed by Douglass and Keramida between 2003 and 2011. A *Phase I ESA* report conducted by Keramida in 2007 for the entire Central State Hospital Complex was found on the IDEM VFC and is included within the 2022 Phase I ESA provided in **Appendix K**. The 2007 Phase I ESA report included, as an attachment, a *Limited Phase II ESA* report prepared by Douglass in 2003.

Following completion of the 2007 Phase I ESA, a Petroleum Remediation Grant was awarded for further investigation activities of the Central State Hospital campus conducted by Keramida in late



2007. During previous investigations, the City of Indianapolis DMD provided IWM Consulting with copies of investigation reports for the Central State Hospital campus prepared by Keramida which included a *Brownfield Investigation and Remediation Report* dated December 12, 2007, documentation of waste disposal activities and a geophysical survey dated February 6, 2008, an *Asbestos Inspection* report dated September 12, 2011, a *Site Investigation Report* dated September 12, 2011, and a dioxin results report for analytical results received after the investigation submittal dated October 7, 2011. Copies of these reports are provided as appendices to the IWM Consulting Phase I ESA (dated March 31, 2020) for the south adjacent properties which is included in the 2022 Phase I ESA provided in **Appendix K**.

<u>Limited Phase II Environmental Site Assessment & Related Services (Third) Draft Report – July 7, 2003 (Douglass)</u>

According to the Executive Summary, this assessment was performed to investigate *RECs* identified by Sagamore Environmental Services, Inc. (Sagamore) in a *Phase I Environmental Site Assessment Report* dated July 24, 2002. The Sagamore report was not included in this report and a summary of the twenty (20) environmental concerns identified was not provided; however, the following services were performed by Douglass, which are assumed to address the issues identified by Sagamore.

- Reviewing a 1989 Asbestos Survey conducted by Micro-Air, Inc. (Micro-Air) to determine whether the survey was comprehensive in scope;
- Developing an Asbestos Abatement Cost Estimate based on the Micro-Air Survey results;
- Conducting surface soil sampling in areas of suspected long-term coal storage to assess potential metal accumulations resulting from coal runoff;
- Conducting subsurface soil and groundwater sampling in the vicinity of the former Laundry Building to assess potential soil and groundwater impacts from the management of dry-cleaning solvents;
- Analyzing soil and groundwater samples collected in the vicinity of the former Laundry Building for Volatile Organic Compounds (VOCs);
- Conducting limited subsurface soil and groundwater sampling in the vicinity of three (3) identified and temporarily closed USTs located in three (3) different locations within Central State Hospital;
- Analyzing limited soil and groundwater samples collected in the vicinity of the three (3) identified USTs for the Total Petroleum Hydrocarbon (TPH) Diesel Range Organics;
- Profiling and labeling the contents of petroleum drums and smaller chemical containers located throughout the subject property buildings;
- Consolidating drums and chemical containers in a central location for future removal and disposal or recycling;
- Determining the volume and nature of residual content of inactive ASTs and USTs;



- Attempting to locate additional USTs using readily available and applicable approaches including visual inspection, field magnetometer or other geophysical methods, and personal interviews with knowledgeable staff;
- Conducting an historical investigation to identify sources of information on unmarked gravesites on the subject property;
- Conducting a specialized canine search of suspected unmarked gravesites in an attempt to clarify the limits of unmarked human burial sites; and
- Preparing a detailed report documenting the results of the investigation and recommendations for additional investigation, as necessary.

A copy of the 1989 Micro-Air asbestos survey was not included as an attachment in this report. The asbestos abatement cost estimate table included in the Limited Phase II report suggested that ACMs were present in tank insulation in the old powerhouse building and in a service building, which was not clearly identified in the report as the provided labeled, aerial photograph is largely indistinguishable. The report also indicated that asbestos-contaminated dirt was present in the utility tunnels which led out from the old powerhouse building. The other buildings identified in the asbestos abatement cost estimate were associated with the Central State Hospital campus, but not the subject property.

According to the Limited Phase II report, coal was historically delivered to Central State Hospital by rail and stored in at least two (2) areas: approximately 250-feet west of the former laundry building (located to the south of the subject property) and immediately west of the old powerhouse building. Since long-term coal storage can generate heavy metal accumulations in runoff areas, surface soil samples were collected from these areas and analyzed for metals. The surface soil sample analytical results indicated that although lead and arsenic concentrations in the samples were elevated, the detections were either below residential default clean-up standards at the time, or were within the ranges of background concentrations in native soil.

Douglass also conducted a chemical inventory of non-fixed and fixed containers (including ballasts, breakers, and transformers) during the 2003 investigation and identified multiple containers containing *petroleum products* and/or *hazardous substances* throughout buildings located on the Central State Hospital campus. The Limited Phase II report specified the location of two (2) empty ASTs: one (1) 2,000-gallon empty AST with secondary containment located on the main level of the old powerhouse building and one (1) 200-gallon empty AST without secondary containment located in the vicinity of a former incinerator located in the wooded area southwest of the subject property, across Kirkbride Way. The substances in the 55-gallon capacity or smaller non-fixed containers were reportedly consolidated by Douglass in the old powerhouse building and later disposed off-site by Keramida in 2007, as discussed later in this section.



Project No. IN23107.01

Subsurface soil and groundwater sampling activities were conducted near buildings associated with the Central State Hospital, but no subsurface samples were collected from the subject property. Soil samples collected near known UST locations at the Bahr, Bolton, and Evans residence halls revealed evidence of petroleum contamination in soil at two (2) of these three (3) locations. Further discussion of the *release(s)* identified near these buildings is provided in Section 5.2.2.

According to the Limited Phase II report, a geophysical investigation was performed on the west side of the Central State Hospital campus to investigate the possible presence of waste disposal sites. Nine (9) test pits were completed to investigate the most significant anomalies identified during the geophysical survey. The observation of materials in the test pits revealed that buried materials were generally benign and included miscellaneous trash/debris and construction materials including brick and concrete. A large quantity of brick, ash, and concrete was observed from approximately 1- to 7-feet below grade in one (1) of the test pits and was attributed to potential debris from demolition of the stack of an adjacent incinerator (likely located near the southwest subject property boundary). A figure illustrating the results of the geophysical survey and locations of the test pits was referenced in the report, but was not included the copy provided in the 2007 Keramida Phase I ESA.

Investigations concerning the gravesite(s) were conducted near the northwest corner and west boundary of the Central State Hospital campus, but were not on the subject property.

Phase I Environmental Site Assessment – July 26, 2007 (Keramida)

The following *RECs* identified on the Central State Hospital campus were outlined by Keramida in the 2007 Phase I ESA:

- According to the regulatory database search, eight (8) USTs are registered at the site. There is believed to be one (1) tank each at the Bahr, Bolton, and Evans buildings and one (1) tank in the vicinity of the Red Cross warehouse (the subject property). The locations of the other four (4) reported tanks are unknown. Previous investigation revealed evidence of releases of petroleum at the Bolton and Evans buildings USTs.
- Old transformers, switches, and breakers at the site may contain fluids with polychlorinated biphenyls (PCBs) or mercury.
- The steam pipes in the utility tunnels are wrapped in a fibrous insulation that may be ACM.
- Old fencing, posts, furniture, and general "junk" has been placed on the west side of the old powerhouse.
- If the buildings are to be demolished, fluorescent light tubes will need to be removed and treated as universal waste. The ballasts will need to be removed and handled as PCB-containing waste unless the ballast is labeled as "PCB free".



- Based on the age of the buildings and large number of Asbestos Management Plans located
 in the administration building, ACMs are likely pervasive in the facility buildings.
 Management of asbestos will be a consideration in either the reuse or demolition of the
 facility structures.
- East and west of the incinerator are mounds composed of dirt, brick and concrete, and a powdery gray material that may be ash. Northwest of the incinerator at the west end of the wood chip area are mounds of wood chips, some soil with asphalt and brick, and two (2) piles at least partially composed of manure.

The following *HRECs* were also listed in the 2007 Phase I ESA by Keramida:

- The location of historic gasoline service stations and dry-cleaners upgradient of the site pose the potential the groundwater beneath the site may be contaminated with *petroleum products* or dry-cleaning solvents from off-site sources.
- Areas of the site along Tibbs Avenue are use-restricted as cemeteries.
- The debris generated by the demolition of the Seven Steeples building was placed in the former structure's basement and buried. Materials containing asbestos, PCBs, lead, and other hazardous construction materials may be present in the debris. The "cottages" of the men's ward were demolished at approximately the same time and may have been demolished in a similar manner, with potentially hazardous materials subsequently buried on-site.
- Interview indicated that glass jars containing medical specimens preserved in formalin were buried near the Indiana Medical History Museum.
- The presence of unmarked graves along the western boundary of the property.
- During the time period between the closure of the facility and purchase by the City, the Indiana Department of Transportation operated a body shop in the Beckman Theater and a paint booth in one of the barns by the Old Motel. Solvents for cleaning metal and paint likely were used and present the risk of a release to the environment if not properly managed.
- There appears to be a casing for an unused well adjacent to the pump house. Logs for additional wells are on file at the Indiana Department of Natural Resources (IDNR) Division of Water. The locations and status of these other wells are not known. If not properly abandoned, the well casings present a direct conduit for contaminant migration to the aquifer.

The 2007 Phase I ESA also identified numerous containers of paint and retail-sized bottles/cans/spray cans of maintenance and cleaning chemicals scattered throughout the buildings on the Central State Hospital campus, and full and empty drums in some of the outbuildings, but particularly in the old powerhouse.



<u>Brownfield Investigation and Remediation Report – December 12, 2007 (Keramida)</u>

Keramida conducted investigation and remediation field activities between September 3, 2007 and October 3, 2007. This work was conducted to investigate *RECs* presented in the 2007 Phase I ESA by Keramida. The investigation and remediation activities included: performing a geophysical survey to confirm that the four (4) known or suspected USTs formerly located at the Bahr, Bolton, and Evans buildings and Red Cross warehouse (the subject property), were no longer present; advancing ten (10) soil borings in the vicinity of the four (4) known or suspected UST locations to investigate soil and groundwater conditions; and excavation and off-site disposal of petroleum-impacted soil in the vicinity of the former Bolton and Evans UST areas. No USTs were identified during the geophysical survey; however, the surveyed area at the Red Cross warehouse (the subject property) building was limited to southwest of the building.

Former Central State Hospital Letter – February 6, 2008 (Keramida)

Documentation of the disposal of *petroleum products* observed during the 2007 Phase I ESA performed by Keramida and a geophysical survey report for activities performed during the earlier Brownfield investigation were included in this letter. Approximately 400-gallons of waste oil/water mixture were pumped from the containers observed in the old powerhouse building during the 2007 Phase I ESA, 54 empty drums, and four (4) drums of waste grease were collected from the site by Liquid Waste Removal, Inc. (LWR) and properly disposed. The geophysical survey report, dated January 17, 2008, was provided by Earth Exploration, Inc. for services performed during the Brownfield investigation and outlines the approximate area near the Red Cross warehouse (the subject property) that was surveyed.

Asbestos Inspection – September 12, 2011 (Keramida)

An asbestos inspection was performed primarily on buildings located on the Central State Hospital campus, but not the subject property, to confirm the condition of previously sampled ACMs and to determine if there were any ACMs that were missed during the 1989 Micro-Air survey.

Site Investigation Report – September 12, 2011 (Keramida)

Keramida conducted site investigation activities between August 25 and September 3, 2011 to assess the impact of *RECs* identified during the 2007 Phase I ESA. Investigation activities included collecting and analyzing composite soil samples from near the incinerator formerly located along the southwest subject property boundary and collecting and analyzing surface soil samples from historical coal storage areas. No polynuclear aromatic hydrocarbons (PAHs) or volatile organic compounds (VOCs) were detected in soil sample collected near the subject property. Arsenic was detected in the surface soil samples collected near, the subject property at concentrations exceeding IDEM RISC Commercial/Industrial Default Closure Level. An ERC restricting groundwater use was subsequently recorded to the Central State Hospital deed (discussed in Section 5.2.1).



Dioxin Results & Level IV Data Packages – October 7, 2011 (Keramida)

Additional analyses were performed on the composite soil samples collected from near the incinerator during the August/September 2011 site investigation by Keramida. The analytical results for dioxin analysis of the incinerator piles was received after submittal of the *Site Investigation Report*. The analytical results indicated that while some dioxins/furans were present in these samples, the concentrations did not appear to exceed any IDEM direct contact screening levels for the compounds with established screening levels. These samples were reportedly collected for waste characterization purposes.

Phase I Environmental Site Assessment – March 31, 2020 (IWM Consulting)

IWM Consulting conducted a Phase I ESA for the two (2) parcels south adjacent to the subject property. The Phase I ESA report is included in the 2022 Phase I ESA provided in **Appendix K**.

Phase II Environmental Site Assessment – August 26, 2022 (IWM Consulting)

IWM Consulting conducted a Phase II ESA for the two (2) parcels south adjacent to the subject property. IWM Consulting performed asbestos and lead paint surveys of the powerhouse building, installed nine (9) hand auger borings to evaluate the potential presence of chemicals-of-concern (COCs) in potential or known surface spill areas and/or incinerator/coal ash deposition areas, installed and sampled six (6) sub-slab vapor points in the basement of the former powerhouse building to evaluate the potential vapor exposure pathway, collected two fluid samples from suspected PCB-bearing powerbank equipment, and collected waste characterization grab samples from incinerator and coal ash deposition areas. A total of twenty-two (22) asbestos, six (6) lead paint, thirteen (13) soil samples, seven (7) waste characterization, and six (6) sub-slab soil vapor samples were obtained for laboratory analysis (not including quality assurance/quality control samples).

IWM Consulting made the following conclusions:

- The presence of PCE in boring CS-HA1 suggests that solvents were historically utilized, stored, and released at the Site. Given the limited number of borings (and depth of borings) installed during the investigation, the overall size of the Site, and the location of the detected PCE concentration, the exact source of this solvent contamination was not clearly identified. It is possible higher PCE concentrations may be present in soil north, east, or west of CS-HA1. Additional borings would be necessary to evaluate whether or not PCE concentrations at CS-HA1 are isolated or are connected to a higher concentration source area. Further evaluation of the groundwater is not necessary at this time since an ERC already exists for the Site and the surrounding Former Central States Complex which restricts groundwater usage.
- The additional soil assessment work around boring CS-HA1 can be completed after the structure (garage) is razed, but care should be taken during demolition activities to minimize disturbance of the soil immediately beneath the garage's concrete slab and to



- properly characterize any soil which requires removal or relocation since PCE has been detected in the soil.
- Most of the surface soil samples contained arsenic concentrations in excess of RDCSLs, with the highest detected concentrations being 13 mg/kg. Historical investigations completed throughout the Site and Former Central States Complex documented arsenic concentrations ranging between 2.9 mg/kg and 18.8 mg/kg. However, the observed arsenic concentrations are also comparable with known Indiana background concentrations of arsenic and as stated in the IDEM issued ERC, arsenic is a naturally occurring element with background levels in Indiana soil generally ranging from 0 mg/kg to 13 mg/kg. The historical Site wide average arsenic concentration calculated by IDEM was 6.8 mg/kg and the results obtained during this investigation support that the arsenic levels observed at the Site are within the typical naturally occurring background rage for arsenic in Indiana (as high as 13 mg/kg). Consequently, no additional investigation of arsenic is warranted at this time if all of the soil will remain on-site during future redevelopment activities.
- The presence of PCBs (Aroclor-1242) in boring CS-HA3 confirms detectable PCB concentrations are present in the area of the historical transformer spill. PCB concentrations at CS-HA3 were not vertically extensive. However, only one sample location was installed in this area. As such, higher PCB concentrations may be present in the near vicinity of CS-HA3. Additional sampling is necessary in order to evaluate whether PCB concentrations at CS-HA3 are representative of the entire potential transformer spill area or if more widespread and higher PCB concentrations exist beyond this sampling location. However, it should be noted that according to the historical spill report, representatives from the electric company removed all visually impacted soil during the response activities. At a minimum, any soil disturbed from this area of the Site during future redevelopment activities should be properly sampled and characterized prior to the soil being removed from the Site or transported to other areas of the Site.
- Regardless of the historical ash composition, the residual ash in the incinerator did not
 contain metal concentrations in excess of an RCG screening level. As such, special
 handling of this ash is not required from a RCRA toxicity standpoint. However, residue
 from solid waste incinerators is considered a solid waste, and must be disposed of in
 accordance with 329 IAC 10.
- PCB concentrations were detected in one of the fluid samples collected from the PBE equipment. Proper disposal of this fluid will be necessary. In addition, the equipment containing the PCB fluid (and potentially surrounding surfaces) will need to be properly addressed in accordance with current State and Federal regulations. This may need to include characterization of any nearby surfaces for residual PCB concentrations especially in the event of building renovation instead of demolition.
- Hazardous concentrations of arsenic were found at the CS-WC3 sample location (basement
 pit near the middle of the building). Ash accumulated in this pit will need to be
 appropriately handled and disposed in keeping with hazardous waste requirements during



- future renovation work. In addition, the solid (non-hazardous) waste contained in the remaining pits will also need to be appropriately disposed.
- Based upon the sub-slab soil vapor results, the potential vapor intrusion exposure pathway in the former powerhouse building appears to be incomplete. However, relatively low-level concentrations of chlorinated solvents were detected elsewhere at the Site and low concentrations of chlorinated solvents were detected throughout the powerhouse building footprint. Given the fact that low level concentrations of PCE were detected immediately beneath the slab of the garage and the lateral extent of PCE impacted soil has not been defined, a vapor intrusion evaluation (sub-slab vapor sampling) should be completed for any additional structures constructed on the Site.
- The results of the asbestos survey indicate that non-friable ACM (roofing material and window glazing) are present in the powerhouse building. As such, these non-friable materials will need to be handled with care in order to prevent these materials from becoming friable during renovation or demolition activities.
- The results of the paint chip samples indicate the lead concentrations in various paints throughout the Site buildings range from 5,100 ppm (0.51 percent by weight) to 240,000 ppm (24.0 percent by weight). If a building with lead paint is renovated, then the lead paint will need to be sealed or professionally abated. In the event of demolition, then total demolition of a structure impacted with lead-based paint is exempt from the EPA's Lead Renovation, Repair and Painting Rule which primarily regulates residential structures. The US EPA has stated that solid architectural components coated with lead-based paint are less likely to be hazardous because of the small ratio of lead paint to total waste mass. The US Army conducted a study which concluded that whole-building demolition debris is not likely to exceed the toxicity characteristic standard for lead if it is handled as a single, whole waste stream and disposed of all together. Whole-building demolition debris can be considered a non-hazardous waste with regard to lead. No sampling/analysis of painted components for lead is required for disposal as non-hazardous waste, unless required by the landfill. Dust control measures should also be maintained during demolition activities to minimize potential exposure to workers or nearby occupants to airborne dust potentially containing lead. The existing lead paint should also be kept in good condition, and flaking or peeling lead paint should be sealed (if possible) or cleaned up in a manner which does not create dust.
- Plans to re-purpose the powerhouse building can proceed provided the work complies with the above guidance regarding PCBs, lead paint, asbestos, ash disposal, etc.

Phase I Environmental Site Assessment – October 5, 2022 (IWM Consulting)

IWM Consulting conducted a Phase I ESA for the subject property and concluded the following:

• AST observed on the western portion of the subject property is a REC



- Possible VEC present on the subject property due to the lack of information pertaining to the materials historically stored in the building, and the limited Phase II investigative work completed to date, is considered a REC by definition.
- Historical operations with documented residual soil and groundwater contamination resulting in an ERC is considered a CREC
- Deteriorated asbestos pipe wrap was observed throughout the building. Additional suspect ACMs were also observed throughout the building (resilient floorings, ceiling tiles, and mastics). The presence of ACM is considered a BER.
- Based on the age of construction and observed peeling paint, lead-based paint is possibly present within the building and is considered a BER.
- Regulated universal waste, in the form of light fixtures, both troffer-style and metal halide fixtures, along with exit signs, thermostats, electrical panels, and switches, were observed throughout the building. These universal waste components are considered to be a BER.

This Phase I ESA is presented in its entirely in **Appendix K**.

<u>Summary Report – Former Incinerator Removal and Oversight – December 16, 2022 (IWM Consulting)</u>

An investigation on the south adjacent property in October through November 2022 characterized onsite waste, and documented the removal of the incinerator structure, removal of removal of a well-house structure, removal of the former garage (Building 19), abandoning the well, and removal of a UST, resulting in 113 tons of demolition debris, 216 tons of concrete, 149 tons of incinerator ash and concrete/brick that was in contact with the ash, 90 tons of weeded vegetation and natural soil, and 32 tons of scrap metal removed from the site and properly disposed offsite. The aforementioned UST contained 10,000-gallons of water, which was removed and recycled/disposed of at TOC, Inc. in Franklin, Indiana, along with 1.53 tons of sludge removed by SSI and transported to Southside Landfill in Indianapolis, Indiana. A waste characterization sample of the UST contents was analyzed at ENVision Laboratories, Inc. located in Indianapolis, Indiana. Minor concentrations of VOCs and PAHs were detected in excess of the laboratory detection limit, but all constituents' concentrations confirmed the fluid present in the UST was characteristically non-hazardous. Compliance sampling was conducted by IWM Consulting personnel, which included two (2) samples from the bottom of the UST cavity, and four (4) sidewall samples. Samples were analyzed at ENVision Laboratories, Inc. and were found to contain non-detectable concentrations of VOCs and PAHs. During investigation activities, an archeological monitoring plan was implemented and conducted by Civil & Environmental Consultants, Inc. (CEC) to oversee the possibility of significant and/or intact archeological sites, features, or materials encountered during excavation. The aforementioned archeological material was not encountered. This Summary Report is presented in its entirely in **Appendix K**.



4.0 SITE RECONNAISSANCE

4.1 Methodology and Limiting Conditions

This section presents information gathered during the reconnaissance of the subject property and adjoining properties. This non-invasive reconnaissance was conducted to observe accessible and representative portions of the subject property for evidence of *RECs*. The following indicators of *RECs*, as per ASTM guidelines, were the focus of this reconnaissance: such as stained soils, stressed vegetation, transformers, evidence of ASTs or USTs, trash and debris, and use and/or storage of hazardous substances or petroleum products.

The reconnaissance of the subject property was conducted on December 5, 2023, at approximately 9:00 AM by Brad Gentry, IWM Vice President and Environmental Professional, along with IWM Staff Geologists Garrett Page and Rebecca Pitcock. Margarette Webb and Eddie Shei representing the City of Indianapolis DMD (User) arranged subject property access and accompanied IWM during site reconnaissance. Weather conditions were overcast and rainy with a temperature of approximately 40° Fahrenheit.

The inspection consisted of first accessing the on-site building and noting interior conditions. Inspection of the exterior portions of the subject property consisted of walking the site perimeter, then traversing the interior portions of the subject property to provide overlapping fields of view of the ground surface as needed.

Physical obstacles preventing the viewing of the grounds on the site were generally not encountered, with the exception of materials located inside the building and overgrown vegetation on the western portion of the subject property. Photographs taken during site reconnaissance, which depict portions of the subject property, are provided in **Appendix B**.

4.2 General Subject Property Setting

The subject property is located within a mixed commercial and semi-agriculturally developed area on the west side of Indianapolis and is situated on the north side of Kirkbride Way approximately 2.9 miles west of Monument Circle, Indianapolis' central business district. The eastern portion of the subject property is bordered by the Indiana Medical History Museum. The northern and western portions of the subject property are bordered by a horse pasture, used by the IMPD Mounted Police Unit. Kirkbride Way borders the southern portion of the subject property, followed by former Central State Powerhouse and stables occupied by the IMPD Mounted Patrol.



4.3 Current Property Use

At the time of the site inspection, the subject property was vacant. The most recent subject property owner was Dapper Brewing Company, LLC; however, they never utilized the subject property for their operations.

4.4 Current Uses of Adjoining Properties

During the site reconnaissance IWM observed the properties surrounding the subject property. The uses of adjoining properties at the time of the reconnaissance are summarized in the following table.

Adjoining Property Usage

Direction	Property Usage	Environmental Conditions
North	A horse pasture, utilized by the IMPD Mounted Patrol is located on the adjacent property north of the subject property. This property is topographically cross-gradient from the subject property.	Not Identified
East	The Indiana Medical History Museum is located on the adjacent property east of the subject property. This property is located topographically cross-gradient from the subject property.	Not Identified
West	Wooded area, followed by IMPD horse pastures is located on the west adjacent property. This property is topographically down-gradient to the subject property.	Not Identified
South	The Central State Powerhouse is located on the adjacent property south of the subject property, across Kirkbride Way. This property is topographically down-gradient from the subject property.	See Section 5.3.5

4.5 Site Reconnaissance Observations

Access to the subject property is from Kirkbride Way located south of the subject property. The subject property consists of approximately 1.64 acres and is currently occupied by a vacant commercial building, totaling approximately 29,220 square feet of floor space. A paved parking lot is located on the southwest corner of the building, within the loading dock area. Grass and woods surround the parking lot and building. An AST was observed in the western portion of the property, on an apparent concrete berm surrounded by a chain link and barbed wire fence. The UST that was previously reported as removed was unable to be located; however, metal conduit pipes were observed protruding from the ground which may have been from a fuel dispenser. The layout of the subject property, including the on-site building, is depicted **Figure 2**.

The L-shaped building is located on the northeastern corner of the subject property and contains approximately 29,220 square feet of floor space with a loading dock area on the southwestern portion of the building. According to information obtained from historical fire insurance maps, the building was built in 1955. Exterior construction consists of brick walls, concrete foundation, and



an asphalt and river rock roof.

Refrigeration rooms were present throughout the building, which consist of concrete floors with drains, acrylic coated metal walls and ceilings used to retain cool temperature and enable easy cleaning, with ceiling mounted coolers.

Remaining rooms inside the building consisted of glazed tile walls, occasionally covered in Styrofoam and cork, concrete floors with ceramic and vinyl tiles, and ceiling tiles. The basement consisted of concrete and drywall walls and ceilings, and concrete floors.

Numerous floor drains were observed throughout the building. An elevator connecting the first floor and the basement was observed, along with coils and other electrical equipment that had been salvaged and left behind by illegal scrappers. A ladder enabling roof access was observed near the elevator on the first floor; however, due to safety concerns and evidence of damage, the ladder was not utilized and the roof was subsequently not inspected.

Signs of vagrants were observed. Several fires occurred throughout the building, with fire damage, ceiling collapse, and soot observed. Electrical equipment was observed in the basement, with a motor inside a containment and numerous connected pipes. Various light fixtures, both troffer style and metal halide style, which may be affixed with PCB-bearing ballasts were observed throughout the building, along with exit signs, thermostats, electrical panels, and switches. Paint in poor condition from the fires was observed, and based on the age of construction, may contain lead. Asbestos containing pipe wrap was observed throughout the building and in noticeably poor condition. Additionally, other suspect ACM, in the form of resilient floorings, ceiling tiles, and mastics were observed.

4.5.1 Site Utilities

The subject property is vacant and as such, the utilities are not in service. Identified public utilities in the vicinity of the subject property are as follows: City of Indianapolis provides potable water and sewage services; AES Indiana (formerly IPL) provides electricity; and Citizens Gas provides natural gas service.

Indiana Department of Natural Resources (IDNR) water supply well records were reviewed and water supply wells were not identified on the subject property. As discussed in Section 3.7, a well located on the south adjacent property was properly abandoned by IWM Consulting's license well driller, in November 2022.

4.5.2 Underground Storage Tanks (USTs)

Common indicators of USTs, such as fill ports, vent pipes or dispensers, were not observed on the property during site reconnaissance. A UST was removed prior to 2003, confirmed by investigations conducted by Keramida which could not locate the UST during a geophysical



survey. Two metal conduit pipes were observed in the location of the former UST which may have been connected to a fuel dispenser.

4.5.3 Aboveground Storage Tanks (ASTs)

One (1) 500-gallon AST was observed within a barbed wire fence on the western portion of the subject property.

4.5.4 Drums, Totes, and Intermediate Bulk Containers

Neither drums, totes nor other intermediate bulk containers of petroleum or other potentially hazardous materials were observed at the subject property.

4.5.5 Hazardous Substance and Petroleum Product Containers

Hazardous substance and petroleum product containers were not observed, with the exception of the 500-gallon AST located on the western portion of the subject property.

4.5.6 Unidentified Substance Containers

Significant unidentified substance containers were not observed during site reconnaissance.

4.5.7 Polychlorinated Biphenyl (PCB) Containing Items

Various light fixtures, both troffer style and metal halide style, were observed throughout the building, along with exit signs, which may be affixed with PCB-bearing ballasts.

4.5.8 Drains and Sumps

Numerous floor drains were observed throughout the building.

4.5.9 Solid Waste

Solid waste storage and/or disposal was not observed on the subject property.

4.5.10 Stains or Corrosion of Floors, Walls, or Ceilings

Significant staining was not observed during the site reconnaissance.

4.5.11 Stained Soil or Pavement, or Stressed Vegetation

Neither stained soil or pavement, nor stressed vegetation, were observed during site reconnaissance.

4.5.12 Standing Surface Water and Pools or Sumps Containing Liquids Likely to be Hazardous



Substances or Petroleum Products

Standing surface water and pools, or related sumps containing liquids likely to be hazardous were not observed.

4.5.13 Pits, Ponds, or Lagoons

Pits, ponds or lagoons were not observed on the property during the site reconnaissance.

4.5.14 Septic Systems or Cesspools

Evidence of a septic system or cesspools on the property was not observed during the site reconnaissance. Nor did IWM observe the generation, treatment, or discharge of wastewater on the property, with the exception of sanitary sewage and storm water. As noted in **Section 4.5.1**, sanitary sewer service is provided by the City of Indianapolis.

4.5.15 Asbestos and Asbestos-Containing Materials (ACM)

Asbestos has historically been present in a wide variety of building materials and the use of asbestos containing materials in buildings constructed prior to 1981 is suspected. An asbestos inspection was not part of the scope of work for this project. However, the assessed facility was constructed circa 1955. ACM in the form of pipe insulation, and suspected in resilient floorings, ceiling tiles, and mastics, were observed throughout the building, and in deteriorating condition. If a qualifying renovation of the subject property building is performed in the future, an asbestos inspection would be warranted at that time.

4.5.16 Lead-Based Paint (LBP)

A lead-based paint inspection was not part of the scope of work for this project. The use of lead-based paint on buildings constructed prior to 1978 is presumed. Based on the age of the building, with a construction date prior to 1978, the use or presence of lead-based paint is suspected. Peeling paint was observed in portion of the building affected by the fires.

4.5.17 Visual Mold / Mildew Observations

A mold/mildew inspection was not part of the scope of work for this project. However, during the site visit, the IWM environmental professional did not observe significant visual evidence of mold or mildew within the accessed portions of the building.



5.0 RECORDS REVIEW

5.1 Physical Setting Sources

Sources utilized to ascertain a reasonably accurate compilation of the physical setting include physical inspection of the subject property with structures by Environmental Professionals; interviews with the property owner; review of aerial photographs and/or satellite imagery; and review of the legal description and property records for the subject property.

5.1.1 Topography

The subject property has a generally flat topography. A review of the United States Geological Service (USGS) *Indianapolis West, Indiana Topographic Quadrangle Map* (USGS 2022) indicated ground surface at the subject property has an elevation of approximately 719 feet above mean sea level (MSL). Regionally, the ground surface generally slopes to the southwest towards Little Eagle Creek. A copy of a portion of a topographic map, including the subject property location, is provided on **Figure 1**.

5.1.2 Soils

A review of data provided on the United States Department of Agriculture (USDA) Natural Resources Conservation Services (NRCS) online *Web Soil Survey* website and in the USDA *Soil Conservation Service Soil Survey of Marion County, Indiana* (USDA, 1977) indicated the upper few feet of soil at the subject property is comprised of the following soil classification: Fox-Urban land complex. However, due to the presence of the subject property building and surrounding pavement that cover the underlying soils, and the potential for the soils to have been reworked or mixed with other fill materials, in-place soil profiles may no longer correlate with the listed soil types. A map of the projected locations of the described soil types, and further descriptions of the soil properties, are presented in **Appendix E**.

5.1.3 Geology

The portion of Marion County occupied by the subject property is covered by thick unconsolidated glacial deposits. The area is dominated by dark, carbonaceous shales (Fenelon, 1994). The bedrock in the area consists of Devonian-Mississippian Age New Albany shale (Gray, 1987). Depth to bedrock near the subject property is approximately 60 feet(Gray, 1983).

5.1.4 Hydrogeology

Groundwater in Marion County and beneath the subject property is obtained primarily from surficial sand and gravel aquifers and buried sand and gravel aquifers. There is little potential for groundwater production in the New Albany Shale bedrock aquifer, which is often described as an



aquitard due to the low well yields this aquifer produces.

The White River and tributaries outwash unconsolidated aquifer system includes thick glacial outwash sands and gravels that are generally capped by a layer of clay and silt deposits. This aquifer system is composed of sediments deposited by, or resulting from, a complex sequence of glaciers, glacial meltwaters, and post-glacial precipitation events. The surficial aquifer is generally unconfined along rivers. Well yields can be as high as 3,040-gallons per minute in this aquifer.

During the 2011 Keramida Site Investigation, groundwater between 15-feet below ground surface (bgs) and 37-feet bgs.

5.1.5 Flood Plains

The United States Department of Homeland Security / Federal Emergency Management Agency (FEMA) National Flood Insurance Program's *Flood Insurance Rate Map* (FIRM) dated April 19, 2016 (Panel Number 18097C0139F) was reviewed. The map indicated the site is located within an area with reduced flood risk due to levee, and is located in Zone X, which FEMA defines as an area of minimal flood hazard from the principal source of flood in the area and determined to be outside the 0.2 percent annual chance floodplain. A copy of the FEMA FIRMette map is provided in **Appendix F**.

5.1.6 Wetlands

A wetlands study was not part of the scope of work for this investigation; however, according to the US Fish and Wildlife Service (USFWS) online *Wetlands Mapper*, designated wetland areas were not identified for the site. The closest designated wetland was riverine habitat (R2UBH) associated with the stream bed for Little Eagle Creek, which is located approximately 0.33 miles west of the site. Based on this information wetlands are not considered an environmental constraint to the property at this time. A copy of the wetlands map is provided in **Appendix G**.

5.1.7 Radon

Radon testing was not part of the scope of work for this project; however, the Federal EPA Radon Zone for Marion County, Indiana is Zone 1. This zone level indicates that, of the testing on record, the average indoor radon level is greater than 4.0 pCi/L (picocuries per liter). The US EPA recommended action level is 4.0 pCi/L. The State of Indiana does not currently regulate radon levels, and it should be noted that levels for the site were not available. The fact that the average radon level in Zone 1 is above the US EPA recommended action level is reported for information purposes only.



5.2 Historical Use Information for the Site and Adjacent Properties

IWM researched publicly available records which had the potential to provide information concerning historical use of the subject property and adjacent properties. Those records which have not been incorporated into the previous sections of this report are discussed below.

5.2.1 Fire Insurance Maps

Environmental Data Resources, Inc. (EDR) provided The EDR Certified Sanborn® Map Report – Former Central State Storehouse, 2998-2900 Kirkbride Way, Indianapolis, IN 46222, dated September 23, 2022, for the site. The Sanborn® fire insurance maps were reviewed to provide a historical interpretation for the subject property and surrounding properties. This research targeted probable waste generation and handling at the facilities, as well as notes changes in the land use of the subject property and its surroundings over time. A copy of the EDR Sanborn® report is provided in **Appendix H**.

Potential uses, businesses, and structures on the subject property parcels are summarized in the table below. It should be noted that the image quality of the maps was not optimal and some labels could not be read or deciphered.

Map Date	Map Description (Site and Immediate Surroundings)
1898 1915 1950	The subject property is undeveloped. The Pathological Department (currently the medical museum), and the morgue are visible along a rail line east adjacent to the subject property. An ice house and a bake house are located south adjacent to the subject property.
1956 1963 1965 1967	The subject property is improved with the current L-shaped building, reportedly used as a refrigeration warehouse. The UST reportedly present on the subject property during this period is not depicted on the provided maps.

Fire Insurance Map Review

5.2.2 Aerial Photographs

Aerial photographs were available for review through the Marion County GIS Data Viewer (MapIndy) website. Aerial photographs were reviewed to provide a historical interpretation for the subject property and surrounding properties. This research targeted probable waste generation and handling, as well as notable changes in the land use of the subject property and its surroundings over time.



Aerial Photograph Review

Photograph Date	Photograph Description		
1936	The aerial photographs are consistent with the 1950 fire insurance map.		
1941	The aerial photographs are consistent with the 1950 fire insurance map.		
1962			
1966	The aerial photographs depict the subject property consistent with the 1956 fire		
1979	insurance map. The L-shaped building is visible on the subject property, along with the		
1986	Pathology Department (currently the medical museum) on the east adjacent property,		
1991	and the powerhouse located south adjacent. Grass and trees surround the subject		
1993	property to the west and north. The red AST is visible beginning in the 1986 aerial photograph.		
1997			
2001			
2002	The aerial photographs depict grubbing of the trees located on the west adjacent		
2003	property. Large dirt mounds are visible, along with heavy machinery.		
2007			
2009	The aerial photographs depict the dirt mounds on the west adjacent property are no		
2010	longer visible. A path is visible bisecting the west adjacent property. A fence has been		
2011	constructed along the north portion of the property, extending into the west adjacent		
2012	property, likely for the IMPD horse pastures.		
2013			
2014			
2015			
2016			
2017	The buildings located east of the subject property underwent demolition, including the		
2018	bake house located on the southeast adjacent property, across Kirkbride Way. Following the demolition of surrounding buildings, the subject property appears		
2019	unchanged.		
2020			
2021			
2022			
2023	The 2023 aerial photograph depicts the demolition of the garage located south adjacent, across Kirkbride Way, along with the demolition of the incinerator structure and well house located southwest adjacent, across Kirkbride Way.		

5.2.3 Recorded Land Title Records

The acquisition and review of recorded land title records was not required by the scope of work for the Phase I ESA. The historical use of the subject property was researched using other sources.



5.2.4 Historic USGS Topographic Maps

Current and historical USGS Topographic Quadrangle Maps available from the United States Geological Society (USGS) were reviewed for information regarding uses of the subject property and neighboring properties. Versions of the *Indianapolis West, Indiana Topographic Quadrangle Map* were available for the years 1948, 1959, 1963 (Photorevised 1972 & 1981), 1998 and 2019 (USGS). A review of the referenced maps is provided below.

Historic Topographic Map Review

Map Date	Topographic Map Description (Site and Immediate Surroundings)
1948	Structures were not identified on the subject property; however, the Central State Hospital complex is depicted to the east. A rail line is visible vertically bisecting the western portion of the Central State Hospital. Scale: 1" = 24,000 ft
1959 1967	A structure consistent with the current site building was located on the subject property. Additional structures were noted to the northwest, east, southeast and south. Scale: 1" = 24,000 ft
1998	The subject property was consistent with the previous map. Structures located on the eastern portion of the Central State Hospital underwent demolition. Scale: 1" = 24,000 ft
2010	
2013	The map provided an overview of roads that surrounded the subject
2016	property, but structures were not included. USGS topographic maps from these years rely on aerial photo layers to illustrate structures. Scale: 1" =
2019	24,000 ft
2022	

5.2.5 City Directories

EDR provided *The EDR City Directory Image Report – Former Central State Storehouse, 2998-2990 Kirkbride Way, Indianapolis, IN 46222*, dated September 22, 2022, for the subject property. A copy of the EDR document is provided in **Appendix I**. The subject property and adjacent properties were not listed in readily available directories; however, it is well documented that the subject property was associated with the Central State Hospital Complex, which was listed from 1920 through 1990.

5.2.6 Summary of Historical Use of the Property

Historical review indicates that prior to 1956, the subject property was undeveloped land located within the Central State Hospital property. Beginning in 1956, the subject property was improved with a 29,220 square foot warehouse that was labeled on historical fire insurances maps as being utilized as a cold storage warehouse. A gasoline UST located on the subject property was removed



prior to 2003, and was not detected during subsequent historical geophysical investigations; however, no UST closure documentation is available. The subject property was utilized as storage in support of the surrounding properties' utilization as an insane asylum until closure in 1994. The subject property was reportedly utilized as a Red Cross Warehouse prior to its current ownership, Dapper Brewing Company, LLC.

Numerous environmental investigations have been conducted throughout the entire Central State Hospital complex, which are summarized in **Section 3.7** and presented within IWM Consulting's 2022 Phase I ESA, provided in **Appendix K**.

5.3 Environmental Records Sources

EDR provided *The EDR Radius Map™ Report – Central State Cold Storage,3302 Kirkbride Way, Indianapolis, IN 46222* (EDR Report), dated December 4, 2023 for the subject property. The EDR Report was reviewed for information regarding reported releases of petroleum and hazardous substances at the subject property or nearby properties.

IWM also reviewed any provided "unmappable" (also referred to as "orphan") listings within the EDR Report, cross-referencing available address information and facility names. Unmappable sites are listings that could not be plotted with confidence, but are potentially in the general area of the property, based on the partial street address, city, or zip code. Any unmappable site that was identified by IWM as being within the approximate minimum search distance from the property, based on the site reconnaissance and/or cross-referencing to mapped listings is included in the discussion within this section.

A summary of the findings for the subject property, adjoining properties, and notable properties in the vicinity of the subject property is provided in this section. A copy of the EDR Report is included in **Appendix J**.

5.3.1 Standard Environmental Record Sources

The following table provides a listing of the findings provided for Standard Environmental Record Sources within the EDR Report. A summary of records for the subject property is provided in **Section 5.3.4**. A summary of records for properties and facilities located adjacent to the subject property is provided in **Section 5.3.5**. Databases with identified findings are highlighted with orange shading.



Summary of Standard Federal, State and Tribal Database Findings

Standard Environmental Records Minimum Search Distance Listed No MPL (National Priority List) 1 mile No No NPL Liens (Federal Superfund Liens) Target Property No NPL Liens (Federal Superfund Liens) Target Property No Federal Delisted NPL Sites Image: No I	nber Sites sted 0 0 0 0
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SEMS-Archive ½ mile No	
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Federal RCRA Corrective Action Facilities (CORRACTS)	
	0
Federal RCRA non-CORRACTS TSDF	
Federal RCRA non-CORRACTS TSDF Facilities ½ mile No	0
Federal RCRA Generators	
LQG (Federal RCRA Large Quantity Generators) 1/4 mile No	0
SQG (Federal RCRA Small Quantity Generators) 1/4 mile No	0
CESQG (Federal RCRA Conditionally Exempt SQG) 1/4 mile No	2
Federal Institutional Controls / Engineering Control Registries	
	0
	0
	0
Federal Emergency Response Notification System (ERNS) List	
	0
State and Tribal Equivalent CERCLIS	<u> </u>
	1
Indiana Scoring Model)	1
State and Tribal Landfill or Solid Waste Disposal Sites	
	0
	0
State and Tribal Leaking Storage Tanks List	J
	6
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Summary of Standard Federal, State and Tribal Database Findings

Regulatory Database Standard Environmental Records	Approximate Minimum Search Distance	Target Property Listed	Number of Sites Listed
VCP (Voluntary Cleanup Program)	½ mile	No	0
SCP (State Cleanup Program Sites)	½ mile	Yes	4
Tribal VCP	½ mile	No	0
State and Tribal Brownfield Sites			
Brownfields	½ mile	No	3

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System

RCRA: Resource Conservation and Recovery Act
TSDF: Treatment, Storage, and Disposal Facilities
FEMA: Federal Emergency Management Agency

5.3.2 Additional Federal, State, and Tribal Environmental Record Sources

In order to enhance and supplement the records provided in **Section 5.3.1** additional records were also reviewed by EDR and included in the EDR Report provided in **Appendix J**. A summary of records for the subject property is provided in **Section 5.3.4**. A summary of records for properties and facilities located adjacent to the subject property is provided in **Section 5.3.5**.

The following table provides a summary of the database review findings for these additional sources for the subject property. However, proprietary EDR database search results, such as *EDR High Risk Historical Records* and *EDR Recovered Government Archives*, are not included in the following table, but may also be summarized in **Section 5.3.5** for properties and facilities located adjacent to the subject property.

Summary of Additional Environmental Database Findings

Regulatory Database Standard Environmental Records	Approximate Minimum Search Distance	Target Property Listed	Number of Sites Listed	
Local Brownfield Lists				
US Brownfields (Listing of Brownfields sites)	½ mile	No	1	
Local Lists of Landfill / solid Waste Disposal Sites				
SWTIRE (Waste Tire Sites Listing)	½ mile	No	0	
SWRCY (Recycling Facilities)	½ mile	No	0	
Indian ODI (Report on Open Dumps on Indian Land)	½ mile	No	0	
Debris Region 9 (Illegal Dump Site Locations)	½ mile	No	0	
ODI (Open Dump Inventory)	½ mile	No	0	
IHS Open Dumps (Open Dumps on Indiana Land)	½ mile	No	0	
Local Lists of Hazardous Waste	Local Lists of Hazardous Waste			
US Hist. CDL (National CDL Register)	Target Property	No	0	
CDL (Clandestine Drug Lab Listing)	Target Property	No	0	
DEL SHWS (Deleted Commissioner's Bulleting Sites)	1 mile	No	0	



Summary of Additional Environmental Database Findings

Standard Environmental Records	Database Findings				
Standard Environmental Records	Regulatory Database	Approximate	Target	Number	
US CDL (Clandestine Drug Labs) Target Property No O PFAS Liens 2 (CFRCLA Lien Information) Records of Emergency Release Report HMIRS (Hazardous Materials Info. Reporting System) Spills (Spills Incidents) Spills (Spills Incidents) Spills (Spills Incidents) Spills (Spills Incidents) Target Property No O Spills 80 (Spill Data from FirstSearch) Target Property No O Spills 80 (Spill Data from FirstSearch) Target Property No O Other Ascertainable Records RCRA NonGen / NLR FUDS (Formerly Used Defense Sites) SCRD Drycleaners (State Coalition for Remediation of Drycleaners (State Coalition for Remediation of Drycleaners Listing) US Financial Assurance Target Property No O O Target Property No O O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O DOD (Department of Defense Sites) Target Property No O Target Property No O Target Property No O Target Property No O ROD (Records of Decision) Target Property No O RAD (Records of Decision) Target Property No O PRP (Potentially Responsible Parties) Target Property No O PADS (PCB Activity Database System) Target Property No O PADS (PCB Activity Database System) Target Property No O O Target Property No O O TITS (Integrated Compliance Info. System) Target Property No O O Target		Minimum	Property	of Sites	
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Spills 80 (Spill Data from FirstSearch) Target Property No O Other Ascertainable Records	1 \ 1		No	0	
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2020 Corrective Action Program List				0	
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Summary of Additional Environmental Database Findings

Regulatory Database Standard Environmental Records	Approximate Minimum Search Distance	Target Property Listed	Number of Sites Listed
Abandoned Mines	½ mile	No	0
FINDS (Facility Index/Registry System)	Target Property	No	0
ECHO (Enforcement & Compliance History Information)	Target Property	No	0
Docket HWC	Target Property	No	0
UXO (Unexploded Ordinance Sites)	1 mile	No	0
Fuels Program	½ mile	No	0
PFAS NPL (Superfund Sites with PFAS Detections)	½ mile	No	0
PFAS Federal Sites	½ mile	No	0
PFAS TSCA (Manufacture and Imports Information)	½ mile	No	0
PFAS RCRA Manifest	½ mile	No	0
PFAS ATSDR (Contamination Site Location Listing)	½ mile	No	0
PFAS WQP (Ambient Environmental Sampling for PFAS)	½ mile	No	0
PFAS NPDES	1/4 mile	No	0
PFAS ECHO	1/4 mile	No	0
PFAS ECHO Fire Training	1/4 mile	No	0
PFAS Part 139 Airport	1/4 mile	No	0
Aqueous Foam NRC	1/4 mile	No	0
PFAS	½ mile	No	0
AIRS (Permitted Source & Emissions Listing)	Target Property	No	0
Asbestos	Target Property	No	0
BULK (Regd. Bulk Fertilizer and Pesticide Facility)	½ mile	No	0
CFO (Confined Feeding Operations)	Target Property	No	0
Coal Ash Disposal Sites	½ mile	No	0
Drycleaners	½ mile	No	0
Financial Assurance	Target Property	No	0
Ind. Waste Sites Listing	½ mile	No	3
Manifest (Manifest Data)	½ mile	No	5
NPDES Permit Listing	Target Property	No	0
OISC (Office of Indiana State Chemist Database)	½ mile	No	0
Tier 2 Facility Listing	Target Property	No	0
UIC Site Listing	Target Property	No	0
MINES MRDS	Target Property	No	0

5.3.3 Local Record Sources

IWM reviewed local record sources, and contacted local regulatory officials, as available and accessible.

Health Department

An information request was submitted to the Marion County Health Department for records on file for the subject property. Debra Patterson, with the department, responded via email on December 8, 2023. According to Ms. Patterson, no information was found. A copy of the email response is



provided in Appendix K.

Fire Department

An information request was submitted to the Indianapolis Fire Department for records on file for the subject property. As of the date of this Phase I ESA, the fire department has not responded. A copy of the information request is provided in **Appendix K**. Evidence of fires occurring within the subject property building was observed. If the fire department's response alters the conclusions of this Phase I ESA, an addendum letter will be issued.

5.3.4 Summary of Records for the Site

According to the EDR Report, the subject property was identified in the UST, Brownfields, and Institutional Control databases searched by EDR.

State Brownfields and Institutional Control Property

The subject property is included as a portion of Brownfields ID 4070435. Environmental investigations have been performed at the Central State Hospital complex (discussed in Section 3.7). A Site Status Letter was issued by IDEM in April 2013 which indicated that lead and arsenic concentrations in soil were within, or barely exceeded, background concentrations in native soil, and an ERC restricting groundwater use was subsequently recorded to the entire Central State Hospital complex (including the subject property). Copies of the Site Status Letter and ERC are included in IWM Consulting's 2022 Phase I ESA provided in **Appendix K**. The impacted groundwater at the subject property is considered a CREC.

UST Property

The property associated with the former Central State Hospital, was listed as a UST property (Facility ID 3288). A gasoline UST was reportedly present on the subject property and removed prior to the 2003 Douglass Limited Phase II ESA; however, no documentation of the UST closure is available other than an Intent to Close Underground Storage Tank System letter approving closure of the UST in December 1998. The Brownfield Investigation and Remediation Report submitted by Keramida in 2007 confirmed no UST was present on the subject property. During the course of the 2007 Investigation conducted by Keramida, five (5) soil borings were advanced in the vicinity of the former UST cavity. Samples collected from the borings were analyzed for BTEX/MTBE, n-Hexane, naphthalene, and TPH-GRO. Minor concentrations of benzene, toluene, xylenes, and n-Hexane were detected in soil samples above the laboratory detection limits, but well below the regulatory screening levels at the time the data was collected. It should be noted that the constituents' concentrations are also below current regulatory screening levels.



5.3.5 Summary of Records for Properties in Site Vicinity

A total of 35 appearances by approximately 15 addressed facilities were observed in the various databases within the target search distances from the site, as provided in the EDR Report. A listing of the properties or facilities identified during the regulatory record search is presented in the EDR Report in **Appendix J** and the findings are summarized below.

- The *EDR Radius Report* indicated an Active National Priority List (NPL) or CERCLIS (Superfund) facility is not located within a two-mile radius of the site.
- The site is not constructed on, or adjacent to, a documented landfill.
- The *EDR Radius Report* identified adjacent portions of Central State hospital within Federal and State databases.
 - Resource Conservation and Recovery Act (RCRA), FINDS, ECHO, Industrial Waste,
 Manifest, and National Pollutant Discharge Elimination System (NPDES)
 - The Central State Village Parcels C&D, located south adjacent, are listed as a former small quantity generator (EPA ID INR000000083) of ignitable (D001), corrosive (D002), and lead (D008) based waste. No violations have been recorded.
 - o UST
- The surrounding property associated with the former Central State Hospital was listed as a UST property (Facility ID 3288). According to the EDR database report, eight (8) permanently out-of-service USTs are associated with the former Central State Hospital. Documentation for closure of four (4) of the USTs is available on the IDEM VFC. The nearest known USTs include a 30,000-gallon steel fuel oil UST installed on the north side of the former "new powerhouse" across Kirkbride Way in 1989 which was removed in 2000, and a 10,000-gallon steel UST located within the incinerator structure south adjacent to the subject property across Kirkbride Way, which was removed by IWM Consulting in November 2022. Evidence of releases were not encountered during closure of both USTs.
- Three (3) of the USTs were reportedly utilized to store fuel oil, which were located east of the subject property and were closed in 2004. Evidence of soil contamination was present in two (2) of the three (3) UST cavities and impacted soil was excavated and disposed offsite. A release was reported to the State Cleanup Section, discussed in upcoming sections.
- A Notification Form for USTs completed in 1986 available on the IDEM VFC identified ten (10) USTs on the Central State Hospital campus. The Notification Form indicated five (5) 5,000-gallon steel kerosene USTs were installed in approximately 1956, and were currently in use at the time, one (1) 1,000-gallon steel gasoline UST installed in approximately 1956 and in use at the time, one (1) 1,000-gallon kerosene UST of unknown construction



was installed in approximately 1946 and had been permanently out of use since 1960, and three (3) 1,000-gallon steel diesel USTs installed in 1973 and currently in use at the time the Notification Form was completed. This Notification Form was submitted prior to installation of the former 30,000-gallon UST associated with the "new powerhouse". A copy of the Notification Form is presented within IWM Consulting's 2022 Phase I ESA provided in **Appendix K.** Information regarding the location, capacity, and construction of the six (6) kerosene USTs is not readily available. No USTs are depicted on the fire insurance maps previously discussed. Based on the analytical results for the soil and groundwater samples collected from the adjacent properties associated with Central State Hospital and numerous assessments previously performed, the unaccounted for USTs are not considered a REC.

O State Cleanup Program

The release(s) from the two (2) USTs discussed above was assigned Incident No. 200402088. According to the UST Closure Report, a total of 144.55 tons of petroleum-impacted soil were over-excavated and disposed of offsite and soil confirmation samples were non-detect. Previous subsurface investigation activities performed at the Central State Hospital complex indicated that groundwater was present at approximately 47-feet bgs; therefore, groundwater samples were not collected. A No Further Action (NFA) status letter for soil impacts was issued by IDEM in March 2004, which requested more information regarding groundwater conditions at the Central State Hospital complex. A groundwater sample was subsequently collected and submitted for analysis; however, according to IDEM, chain-of-custody procedures were not followed and a Site Status Letter was issued in June 2004 as a conclusive NFA determination could not be reached for groundwater. Further investigation and excavation of impacted soils around the two (2) USTs with reported releases was performed by Keramida in 2007. Based on the analytical results of confirmation soil and groundwater samples collected during the 2004 and 2007 remediation activities, the releases from the USTs are not considered to be RECs.

Brownfields

Central State Hospital has undergone numerous investigations which have been discussed in prior sections. The Site Status Letter issued by IDEM in April 2013 documenting lead and arsenic concentrations in soil present at the Central State Hospital, and subsequent ERC restricting groundwater use is considered a CREC.



Based on IWM's experience, contaminants released in soil or groundwater in the general area of the site property are generally not expected to migrate greater than approximately 1/8 mile from the source of the release. Therefore, properties or facilities located greater than 1/8 mile from the target property are generally not believed to represent a likely concern at this time. In addition, IWM determined the listed sites were unlikely to have affected the site property based on factors including (but not limited to):

- The nature of the listing;
- The use of the site:
- When the site was listed and its current listed status;
- The developmental density of the setting;
- The distance between the listed sites and the site property (considering the distance that releases are likely to migrate based on surface and subsurface conditions);
- The presence of intervening drainage divides; and,
- The inferred groundwater flow direction.

Based on the criteria listed above, the non-adjacent properties identified in the EDR Report are not considered to represent potential RECs for the subject property at this time.

5.3.6 Subsurface Vapor Migration Evaluation

A VEC is defined in ASTM 2600-22 as the "presence or likely presence of COC vapors in the vadose zone of the subject property caused by the release of vapors from contaminated soil and/or groundwater either on or near the subject property as identified by Tier 1 or Tier 2 procedures."

IWM considered the nature and extent of on-site and nearby sources of potential subsurface vapor migration by evaluating the current and historical usage of the property, the construction type and history of any buildings, the physical setting, and the potential sources of subsurface vapor migration through the review of regulatory agency database information presented and discussed in **Section 5.3.4** and **Section 5.3.5**.

Vapor from subsurface sources, such as contaminated soil or groundwater can migrate into buildings with a variety of foundation types. According to EPA guidance, three (3) conditions must exist for hazardous vapors to reach the interior of buildings from the subsurface environment underneath or near a building. These conditions are:

- a source of hazardous vapors must be present in the soil or in groundwater underneath or near a building;
- vapors must form and have migration pathways to beneath the building; and,



• entry routes must exist within the foundation and a driving force must be present to draw or push the vapors into the building.

Based on results of the records review discussed in **Section 5.3.4** and **Section 5.3.5**, an on-site or nearby source of potential subsurface vapor migration was identified. Therefore, the risk of vapor migration into on-site buildings cannot be ruled out at this time.

5.3.7 Per- and poly-fluoroalkyl substances (PFAS)

A preliminary desktop evaluation regarding the potential presence and/or historical use or application (by use of fire-fighting foam or industry) of per- and poly-fluoroalkyl substances (PFAS), which are considered "emerging contaminants", was performed in conjunction with the Phase I ESA. No known industrial operations that utilize or manufacture PFAS compounds have occurred at the subject property. However, since PFAS is used in several different types of manufactured and commercially-available products and their presence has been found to be pervasive and ubiquitous through studies, the presence or absence of PFAS cannot be determined at this time. PFAS are a component of aqueous film-forming foam (AFFF), which has historically been used fight petroleum-based fires at airports and aircraft manufacturing facilities. Evidence of fires occurring within the subject property building was observed during reconnaissance. Prior to the completion of this report, the Indianapolis Fire Department did not provide a response to an information request pertaining to the type of fire suppressant utilized. Additional sampling would be required to determine whether this emerging contaminant can be ruled out as a possible contaminant of concern.



6.0 INTERVIEWS

In order to obtain additional information to assist in the identification of recognized environmental conditions in connection with the property, reasonable attempts were made to interview parties with potential to have information concerning the subject property's past and current uses, environmental issues or problems. Completed interviews are summarized below and provided information has been incorporated into applicable sections of this report.

IWM also interviewed (or made reasonable attempts to do so) the subject property representative identified by the Client to gain more information about the subject property uses and environmental issues, if known by the interviewee.

6.1 Interview with Property Owner

The current ownership was administratively dissolved in November 2021; therefore, the subject property owner was not interviewed as part of this Phase I ESA.

6.2 Interview with Site Manager or Site Contact

The facility is vacant, as such, no interview with a manager or contact was conducted.

6.3 Interviews with Occupants

See the response to **Section 6.2** above.

6.4 Interviews with Local Government

An information request was submitted to the Marion County Health Department for records on file for the subject property. Debra Patterson, with the department, responded via email on December 8, 2023, and a copy of the response is provided in **Appendix K**.

An information request was submitted to the Indianapolis Fire Department for records on file for the subject property. As of the date of this Phase I ESA, the fire department has not responded. A copy of the information request is provided in **Appendix K**. Evidence of fires occurring within the subject property building was observed. If the fire department's response alters the conclusions of this Phase I ESA, an addendum letter will be issued.

6.5 Interviews with Others

Additional interviews were not obtained.



7.0 EVALUATION

7.1 Findings and Opinions

Based on review of available documentation and physical inspection of the site, the following issues were identified as representing environmental concerns affecting, or having the potential of affecting, the site. An *Opinion* is provided following each identified *Finding* as warranted.

- 1. The subject property was identified in the State Brownfields, Institutional Control, and UST databases as provided in the EDR Radius MapTM Report.
 - The subject property is included in the ERC for the Central State Hospital complex restricting groundwater use. The impacted groundwater at the subject property is considered a CREC.
 - A gasoline UST was reportedly present on the subject property and removed prior to 2003. No closure documentation is available on the IDEM VFC. A geophysical survey conducted by Keramida in 2007 confirmed no UST was present. Minor detections of VOCs and PAHs were detected in soil samples collected from soil borings advanced near the area of the suspected UST were present at concentrations above laboratory detection limits, but well below historical and current regulatory screening levels.
- 2. A total of 35 appearances by approximately 15 addressed facilities were identified in the searched databases, within the target search distances from the subject property, as provided in the EDR Report. Portion of the Central State Hospital were mapped by EDR as being adjacent, or nearly adjacent, to the subject property, and listed on the following Federal and State databases:
 - RCRA, FINDS, Echo, Industrial Waste, Manifest, and NPDES
 - No violations recorded
 - UST, State Cleanup, and Brownfields/Institutional Control
 - O A UST Notification Form completed in 1986 identified ten (10) USTs on the Central State Hospital Campus, six (6) are unaccounted for. Based on the analytical results for the soil and groundwater samples collected from the adjacent properties associated with Central State Hospital, and numerous assessments previously performed, the unaccounted USTs are not considered a REC.
 - Releases from two (2) USTs was assigned Incident No. 200402088 within the State Cleanup Program. Based on analytical results from confirmation soil and groundwater samples collected during remediation activities between 2004 and 2007, the release(s) from the USTs are not considered to be RECs.
 - Central State Hospital has undergone numerous investigations which are discussed in forthcoming sections. The Site Status Letter issued by IDEM in April 2013 documenting lead and arsenic



concentrations in soil present at the Central State Hospital, and subsequent ERC restricting groundwater use is considered a CREC.

- 3. During site reconnaissance, a 500-gallon AST was observed on the west side of the parking lot, in a concrete berm surrounded by barbed wire and chain link fence. According to a Phase I ESA conducted by Keramida in 2007, the AST previously contained gasoline.
 - The AST and its reported contents of petroleum products is considered a REC.
- 4. Floor drains were observed throughout the interior of the subject property.
 - The presence of floor drains, coupled with lack of information regarding materials historically stored onsite during Central State Hospital operations constitutes a possible VEC, which is by definition, a REC.
- 5. Deteriorating asbestos pipe insulation was observed throughout the building. Additional suspect ACMs were also observed throughout the building, including resilient floorings, ceiling tiles, and mastics. The presence of ACMs is a BER.
 - In the event qualifying modifications to the subject property building are planned, state and
 federal regulations requiring an asbestos inspection be conducted prior to demolition or
 renovation activities, should be consulted.
- 6. The use of lead-based paint or sealers on buildings constructed prior to 1978 is presumed. Based on the age of the building, with a construction date circa 1956, the use or presence of lead-based paint is suspected. The potential presence of lead-based paint is a BER.
 - Applicable regulators should be contacted to verify requirements; and local, state, and federal regulations must be followed during maintenance, renovation, or demolition activities, to protect workers, occupants, and the subject property from contaminants associated with lead-based paints/sealers.
- 7. Various light fixtures, both troffer style fluorescent lamp and metal halide style, which may be affixed with PCB-bearing ballasts were observed throughout the building, along with exit signs, thermostats, electrical panels, and switches. The presence of these universal waste items is considered a BER.
 - Proper handling, disposal, and/or recycling of these universal waste items should be conducted to prevent potential exposure to PCBs, CFC, tritium, or mercury.

7.2 Deviations and Significant Data Gaps

Deviations from the stated scope of this assessment are not noted. Additions are discussed in **Section 2.4** and include a review of readily available information sources, such as literature references, site reconnaissance observations, and age of on-site structures, to provide some insight into risks which may exist related to: wetlands, radon, ACMs, lead-based paint, and mold.



Data gaps are a lack of or inability to obtain information despite good faith efforts by the environmental professional to gather such information. According to ASTM Standard Practice E1527-21, data gaps are significant if "other information and/or professional experience raise reasonable concerns involving the data gap." Data gaps may result from incompleteness in the activities required in the ASTM Standard, including but not limited to the subject property reconnaissance, records review, or interviews. The presence of a data gap may or may not present a REC due to the possibility that a REC could be discovered if the missing information is obtained. In preparation of this Phase I ESA, data gaps, as defined by ASTM Practice E1527-21, were encountered:

- The local fire department did not provide information regarding the property in response to an information request, specifically the type of fire suppressant utilized in recent interior fires. (Section 5.3.3 and Section 6.4).
- Owner interview was not conducted (Section 6.1)
- Lack of information regarding the materials historically stored in building during Central State Hospital operations
- The subject property building's roof was not inspected due to safety concerns

In the opinion of the Environmental Professional, these limitations did not affect the overall interpretation of the data, prevent historic Site usage from being determined, or reduce the capacity to identify RECs, and do not alter the conclusions of this report.

7.3 Conclusions and Opinions

IWM has performed a Phase I Environmental Site Assessment of the property located at 3302 Kirkbride Way in Indianapolis, Indiana, in conformance with the scope and limitations of ASTM Practice E1527-21. Any exceptions to, or deletions from, this practice are described in **Section 7.2** and **Section 2.0** of this report.

It is the opinion of IWM that, based on IWM's review of available data and observations made during the site inspection:

This assessment has revealed evidence of RECs, CRECs, and BERs in connection with the subject property, specifically:

- AST observed on the western portion of the subject property is a REC
- Possible VEC present on the subject property due to presence of floor drains, lack of information pertaining to the materials historically stored in the building, and the limited Phase II investigative work completed to date, is considered a REC by definition.
- Historical operations with documented residual soil and groundwater contamination resulting in an ERC is considered a CREC



- Deteriorated asbestos pipe wrap was observed throughout the building. Additional suspect ACMs were also observed throughout the building (resilient floorings, ceiling tiles, and mastics). The presence of ACM is considered a BER.
- Based on the age of construction and observed peeling paint, lead-based paint is possibly present within the building and is considered a BER.
- Regulated universal waste, in the form of light fixtures, both troffer-style and metal halide fixtures, along with exit signs, thermostats, electrical panels, and switches, were observed throughout the building. These universal waste components are considered to be a BER.



Dated: December 13, 2023

8.0 STATEMENT OF ENVIRONMENTAL PROFESSIONALS

We declare that, to the best of our professional knowledge and belief, we meet the definition of *Environmental Professional* as defined in § 312.10 part of 40 CFR 312.

We have the specific qualifications based on education, training and experience to assess a property of the nature, history and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Qualifications of IWM personnel involved in the site reconnaissance, research and completion of this Phase I Environmental Site Assessment report are included in **Appendix L**.

Greg Scarpone, LPG (IN #2030)

Vice President

IWM Consulting Group, LLC

By Rebecca Pitcock Dated: December 13, 2023

Rebecca Pitcock Staff Geologist

IWM Consulting Group, LLC



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9.0 REFERENCES

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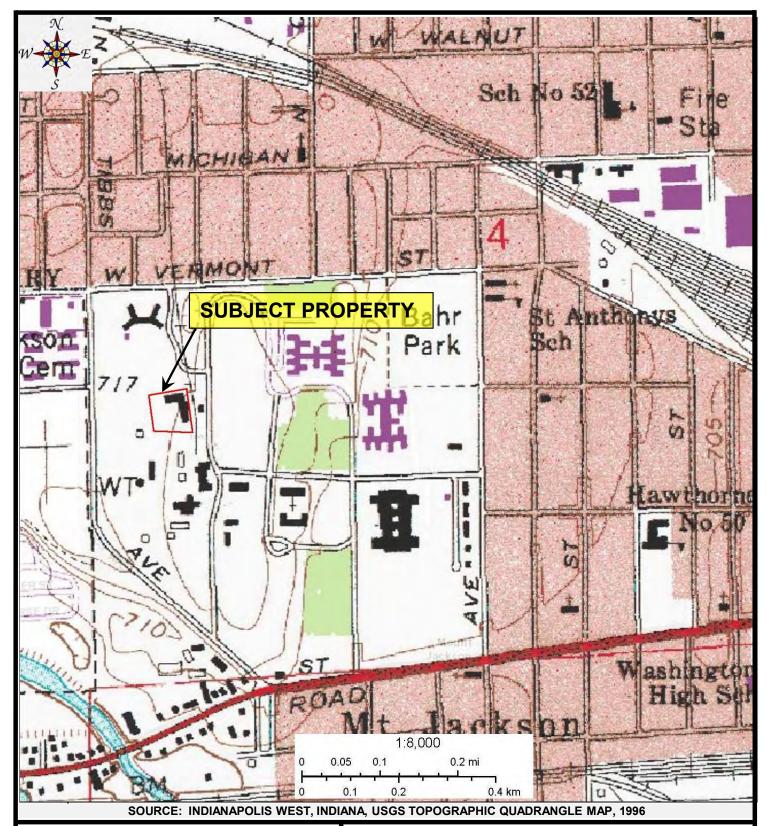
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- United States Department of Agriculture, Soil Conservation Service, 1977, Soil Survey of Marion County, Indiana.
- United States Department of Agriculture, Natural Resources Conservation Service, Web Soil Survey. https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm
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- United States Department of the Interior / Fish and Wildlife Service: *National Wetlands Inventory Wetlands Mapper*. http://www.fws.gov/wetlands/Data/Mapper.html
- United States Department of the Interior Geological Survey, 1955, 1973, 1979, 2013, 2016 and 2019, 2022, *Indianapolis West, Indiana, 7.5 Minute Series Quadrangle (Topographic*).



APPENDIX A

REFERENCED MAPS





CONSULTING GROUP

7428 Rockville Road Indianapolis Indiana 46214 (317) 347-1111 Fax: (317) 347-9326

Project Task Size Date

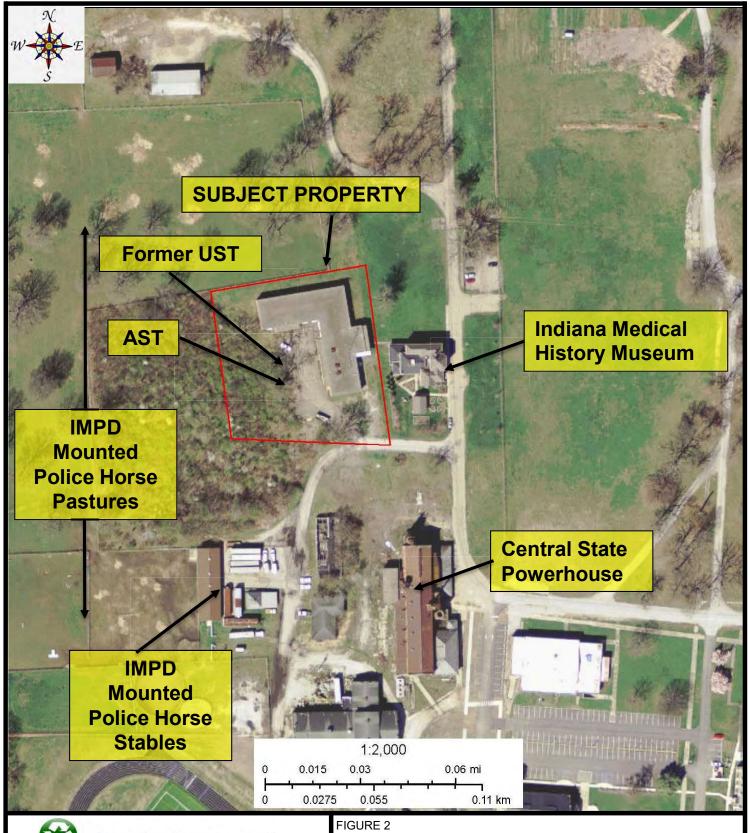
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FIGURE 1

Subject Property Location Map Former Central State Storehouse 3302 Kirkbride Way Indianapolis, Marion County, Indiana

CLIENT

CITY OF INDIANAPOLIS,
DEPARTMENT OF METROPOLITAN DEVELOPMENT
INDIANAPOLIS, INDIANA





7248 Rockville Road Indianapolis Indiana 46214 (317) 347-1111 Fax: (317) 347-9326

Α

12/13/2023

Project Task Size Date

01

IN23107

Subject Property Area Map Former Central State Storehouse 3302 Kirkbride Way Indianapolis, Marion County, Indiana

CLIENT
CITY OF INDIANAPOLIS,
DEPARTMENT OF METROPOLITAN DEVELOPMENT
INDIANAPOLIS, INDIANA

APPENDIX B

SITE PHOTOGRAPHS



View of the southern portion of the subject property building, facing north



Photo 2

View of the loading dock portion of the subject property building, facing north



Photo 3

View of wooded area on the western portion of the subject property, which extends onto the west adjacent property, facing west





View of IMPD horse pastures located on the north adjacent property, facing north



Photo 5

View of the Indiana Medical History Museum, located on the east adjacent property, facing northeast



Photo 6

View of the south adjacent powerhouse, across Kirkbride Way, facing south





View of former incinerator structure, now vacant, wooded land, facing southwest across Kirkbride Way



Photo 8

View of AST located on the western portion of the subject property



Photo 9

View of metal conduit observed near the location of the former UST, likely from a former fuel dispenser





View inside the building, soot and evidence of fire visible



Photo 11

View of interior of the building, with evidence of fires observed



Photo 12

View inside the basement





View of deteriorating asbestos pipe insulation



Photo 14

View of mechanical equipment within the basement



Photo 15

View of freight elevator connecting the basement and first floor



