

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

**RCRA FINAL DECISION
AND RESPONSE TO COMMENTS**

FOR

**STEWART-WARNER CORPORATION
1514 DROVER STREET
INDIANAPOLIS, INDIANA**

U.S.EPA ID No. IND 005 213 715



FINAL DECISION

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Introduction

The U. S. Environmental Protection Agency presents this Resource Conservation and Recovery Act (RCRA) Final Decision for the Stewart-Warner site (formerly known as the Southwind facility), located at 1514 Drover Street in Indianapolis, Indiana. Included in this document is the previously issued Statement of Basis. The Final Decision selects the remedy to be implemented at the Stewart-Warner site, based on the Administrative Record and public comments. The Statement of Basis outlined potential remedial alternatives at the facility as well as EPA's proposed remedy and was made available to the public for review and comment on May 8, 2007. The public was notified of the 45-day public comment period through direct mailings and through the local Newspaper / radio stations.

Remedy Selection

EVALUATION CRITERIA:

The final corrective measure alternative as required under EPA statutes was based on an evaluation under a set of specific threshold criteria, which consist of the following:

- Protection of human health and the environment by eliminating or reducing exposure risks.
- Attainment of media cleanup technology based objectives. (in this case soil and groundwater)
- Control the source of the releases so as to reduce or eliminate, to the extent practical, further releases that may pose a threat to human health and the environment.
- Comply with any applicable standards for management of wastes.

In addition, the final corrective measure decision was evaluated by analyzing balancing criteria such as implementability, effectiveness, and cost. An evaluation of the soil and groundwater remedial alternatives was performed with consideration of each of the above criteria. Based on the actual current and potential future exposure pathways and currently operating Interim Measures and on a detailed evaluation of the various technologies and alternatives, EPA has selected the following Corrective Measures as the "Final Remedy" to address contaminated media at the former Stewart-Warner facility.

FINAL REMEDY:

The selected Remedy includes a suite of corrective measures for both soil and groundwater. The selected Option, which includes current Interim Measures, is a combination of active remediation systems (Current Interim Measures systems – Vapor Intrusion (VI) mitigation systems, Soil Vapor Extraction/Air Sparging (SVE/AS) system), Lower Soil Zone SVE/AS system, White River discharge Outfall signs and fencing) and Institutional Controls /Restrictive Covenants. The selected remedy utilizes active remediation to reduce the levels of hazardous constituents in soil and groundwater and combines it with a suite of institutional controls and restrictive covenants to ensure continued protection of human health and the environment. The selected technological remedy (Soil Vapor Extraction/Air Sparging) is a proven technology for the removal of Volatile Organic Compounds (VOCs) from soil and groundwater. The principal Contaminants of Concern (COCs) at the site are Trichloroethylene and Perchloroethylene (TCE and PCE).

A portion of the remedy is technology based; Stewart-Warner will operate the SVE/AS systems for a minimum of two years until the concentrations of VOCs in the SVE exhaust reach asymptotic levels, that is, when VOC removals cease to decrease any further.

The requirements of the Final Remedy are outlined below:

- Operation of the SVE/AS systems for at least two years from the effective date of the Final Decision document. The rationale for terminating the treatment system operation is explained in the “Determination of Remedial System Termination” section.
- Continued operation and maintenance of Vapor Intrusion (VI) mitigation systems in nearby residential basements and crawlspaces in order to prevent human exposure.
- Maintenance of signage and fencing around the Eli Lilly and Company (Lilly) outfall at the White River.
- Implementation of the selected Institutional Controls / Restrictive Covenants that will include prohibition of new residential water wells, maintenance of the existing surface barriers and adhering to the industrial zoning classification. Any new construction will require worker notification of site conditions and compliance with risk based construction standards as well as ensuring compliance with Federal/state laws for management of excavated soils.
- Maintenance of site access controls such as fencing, health and safety plans at the facility, as necessary, to minimize unacceptable risk associated with human exposure to site contaminants.
- Stewart-Warner will enter into a Corrective Measures Implementation Order or its equivalent with EPA for implementation of the final remedy provisions.

Treatment System

OPERATION OF SVE/AS SYSTEM:

There are five SVE/AS systems currently in operation at the site and are designated as follows:

- SVE/AS Pilot Test/ Interim Measures– 6 SVE wells and 9 AS wells
- SVE Well Group 5/6– 17 SVE wells and 7 AS wells
- SVE Well Group 3/4– 18 SVE wells and 9 AS wells
- SVE Well Group 1/2– 18 SVE wells and 5 AS wells
- SVE Well Group 7– 5 SVE wells

DETERMINATION OF REMEDIAL SYSTEM TERMINATION:

The following narrative describes the procedures and basis for the determination of the termination point for the operation of the SVE/AS systems. As stated, the SVE/AS systems are a technology based remedy and will be used in conjunction with Institutional Controls/Restrictive Covenants (IC/RC) to serve as the final remedy.

- The five SVE/AS systems will be operated for a minimum of two years from the effective date of the Final Decision document.
- VOCs mass removal rates will be calculated from measured values of concentrations and flow rates which will be monitored throughout the operation of the systems; semi-annual progress reports will be submitted to EPA.
- The mass removal rates will be monitored for the rate of removal of VOCs and the approach of asymptotic removal rates.
- Once asymptotic levels have been attained and maintained for three (3) months, the system operation will be terminated at that location.
- Rebound test (for concentrations and mass removal rates) will be conducted after the system shutdown for a minimum of one (1) week.
- Exposure pathway assessment will be performed following confirmation of asymptotic levels to ensure acceptable human exposure risk.
- Economic cost/benefit analysis will be performed to evaluate Human health exposure risks of shutting off the systems vs. continued operation of the systems.
- Finally, a determination will be made in conjunction with EPA to evaluate the permanent shut down of the system and assessing the status of the corrective action.

Public Participation

The public comment period was announced through a newspaper advertisement in the Indianapolis Star newspaper, as well as a radio announcement, direct mailing, and a posting on the EPA web site. The public comment period ran from May 8, 2007 through June 11, 2007. The Statement of Basis and supporting Administrative Record were placed in the West Indianapolis Branch Library in Indianapolis, Indiana and EPA, Region 5, Land and Chemicals Division (formerly the Waste, Pesticides and Toxics Division) for public review prior to and during the public comment period.

Public Comments

There were no public comments submitted/ received during the public comment period.

Future Actions

An Administrative Order (CMI Order) or modification of the existing 3008(h) order will be negotiated with Stewart-Warner to provide an enforceable instrument for implementation of corrective measures and for ensuring that financial assurance remains in place for completing Corrective Measures and for enforcing Institutional Controls.

Declaration

Based upon the Administrative Record compiled for this corrective action, EPA has determined that the selected remedy with all its provisions is appropriate and is protective of human health and the environment.



Margaret M. Guerriero
Director
Land and Chemicals Division

1/31/08
Date