



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS

October 2024

Former IBM Corporation Greencastle Facility

1901 State Road 240 East

Greencastle, Indiana

U.S. EPA ID. IND 081534075

I. INTRODUCTION

Under the Resource Conservation and Recovery Act (RCRA), all permitted and interim status hazardous waste treatment, storage, or disposal facilities are required to conduct corrective action for any releases of hazardous waste or hazardous constituents at or from their facilities.

This Statement of Basis is issued by the Indiana Department of Environmental Management (IDEM), regarding the Former IBM Greencastle Facility, 1901 State Road 240 East, Greencastle, Indiana 46136. (hereinafter referred to as the “facility”) IDEM has determined that no further corrective action is necessary for any of the identified solid waste management units (SWMUs), areas of concern (AOCs), or former source areas at this facility.

IDEM is issuing this Statement of Basis as part of its public participation responsibilities under RCRA Corrective Action Program guidance and is using the administrative procedures found in 40 CFR Part 270, as adopted by reference, to provide public notice and solicit comments. The public notice period is hereby announced and will continue for 30 days from the published date of the Public Notice in the Greencastle Banner-Graphic.

This Statement of Basis summarizes information found in greater detail in the work plans, reports, or other documents in this facility’s administrative record, which can be accessed via IDEM’s Virtual File Cabinet (VFC). IDEM encourages the public to review these documents in order to gain a more comprehensive understanding of the facility and the activities that have been conducted under RCRA authority. IDEM may modify this determination or select another remedy based on public comments or new information obtained.



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We appreciate your input!



This determination will complete the corrective action process under the RCRA Corrective Action Program for this facility. The facility must continue to comply with all applicable parts of RCRA.

II. FACILITY BACKGROUND

This site was developed by IBM in the late 1950s for the manufacture of punch cards for computers. The land was previously undeveloped. In 1987, the majority of the facility was sold to FB Distro. IBM retained ownership of 14 acres in the northern portion of the facility. There is an agreement in place that allows IBM to conduct groundwater monitoring and remediation for the entire facility.

In 1986, three separate plumes of volatile organic compounds (VOCs) were identified in the groundwater beneath the facility. The largest was associated with the former chemical storage building and the former gravel filter bed. The chemical storage building, and gravel filter bed were removed as part of a voluntary corrective action in the late 1980s. The second plume was associated with the former burn pit located to the west of the former helicopter pad. The third plume was associated with the loading dock area in the north central portion of the main building. Chlorinated solvents were formerly stored here in underground storage tanks that were removed in 1975.

In 1988-1989, IBM developed and installed a groundwater trench collection system. The groundwater collected by this system was treated in an on-site wastewater treatment plant and then discharged through an outfall, permitted under the National Pollutant Discharge Elimination System. This system was operational from 1989 to 2018.

The concentrations of VOCs in the groundwater have decreased during the three decades the groundwater collection and treatment system operated. While two monitoring wells located within the interior of the portion of the facility show groundwater concentrations above IDEM's Risk-based Closure Guide's (RCG's) Residential Closure Levels for these VOCs, the VOCs are below RCG's Commercial Closure Levels and IDEM has determined the plume is stable.

In 2018, IBM implemented a two-year shutdown test of the groundwater collection and treatment system. The concentrations of VOCs remained stable under non-pumping conditions, demonstrating the system was not needed to maintain corrective action objectives. The system was permanently removed on March 23, 2023 (VFC # 83452457). Four years (2019-2022) of recent groundwater sample results indicate the remaining VOCs in groundwater are not migrating off-site.

The contaminants of concern remaining in soil and/or groundwater are as follows: 1,1,1-trichloroethane, 1,1-dichloroethene, 1,1-dichloroethane, chloroethane, tetrachloroethene, trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene, vinyl chloride, Freon 113 (1,1,2-Trichloro-1,2,2-Trifluoroethane), Freon 11 (Trichlorofluoromethane), Freon 12

(Dichlorodifluoromethane), benzene, toluene, ethylbenzene, o-xylene, m,p-xylene, 2-butanone, 1,2-dichloroethane, (EDC), 1,1,2-trichloroethane, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, acetone, chloromethane, chloroform (trichloromethane), chlorodibromomethane, and methylene chloride. VOCs remain in the unsaturated vadose zone soil within the former source areas; however, they are below IDEM's Risk-based Closure Guide's screening levels.

III. SITE ASSESSMENT

IDEM identified the following SWMUs at the facility:

SWMU 1 Underground Chemical (solvent) Storage Tanks

SWMU 2 Stormwater Sewer Systems

SWMU 3 Helicopter Pad Area associated Tanks

SWMU 4 Underground Fuel Oil/Gasoline Tanks

SWMU 5 Chemical Storage Building (Pre-RCRA)

SWMU 6 Water Treatment Filtration Bed

SWMU 7 Loading Dock Area (Main Building)

SWMU 8 Oil Pump Separator

IV. SUMMARY OF THE CORRECTIVE ACTION DETERMINATION

Based on the administrative record, IDEM is proposing no further action for all of the identified SWMUs and AOCs. IDEM recommends that a Corrective Action Complete with Controls determination be issued for the IBM facility. "With Controls" means that IBM recorded an Environmental Restrictive Covenant (VFC # 83618181), with restrictions including but not limited to, prohibiting residential and agricultural use of the property, restricting intrusive activity, and prohibiting the extraction of ground water.

V. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination, particularly if you are aware of past spills and/or releases that have occurred at this facility. You may request IDEM hold a public hearing. At a public hearing, you would have the opportunity to submit oral or written comments. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing 30 days in advance.

The Public Notice and the administrative record are available for review via IDEM's Virtual File Cabinet. To view these documents, go to www.in.gov/idem/legal/public-records/virtual-file-cabinet/. VFC Content IDs are provided in Section VI. for the primary documents IDEM used to support this decision.

Before taking final action, IDEM will give full consideration to all significant and relevant comments received. IDEM will summarize the comments and its responses to the comments and announce its decision in a Final Decision/Response to Comments document. This document will be incorporated into the administrative record. To send written comments or obtain further information, contact:

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VI. REFERENCES

Environmental Restrictive Covenant, dated 3/17/2024 (VFC # 83618181)

No Further Action Approval, dated 3/8/23 (VFC # 83452457)

No Further Action Request, dated 10/28/2022 (VFC # 83386726)

Remedial Action Plan Report Addendum III, dated 3/28/1991 (VFC # 80462913)

Remedial Action Plan Report Addendum VI, dated 3/29/1994 (VFC # 80455904)

Annual Report Remedial Action Plan Addendum No. X, dated 3/1/1998
(VFC # 80455799)

Modified Closure Plan Approval, dated 6/30/21988 (VFC # 80455768)

Closure Plan-IBM Greencastle IND081534075, dated 5/25/1988
(VFC # 80455766)

IBM Corporation Preliminary Investigation Project 86114, dated 2/1/1987
(VFC # 35343509)

Closure Plan for the Hazardous Waste Storage Facility, dated 12/8/1987

(VFC # 80441290)

Part A, dated 11/10/1980 (VFC # 80455773)