



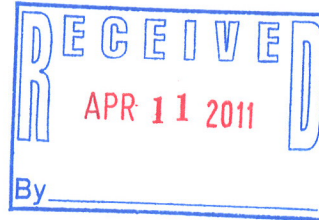
Department of Public Works
Indianapolis
Gregory A. Ballard, Mayor

2700 SOUTH BELMONT AVENUE
INDIANAPOLIS, IN 46221

April 5, 2011

CERTIFIED MAIL: 7001 2510 0005 9219 8387

Mr. David Favero
Favero GeoSciences
1210 South 5th Street – Suite 2
Springfield, IL 62703



Re: Industrial Discharge Permit #372403
Closed Surface Impoundment-former Allison site
REALM to Environmental Trust

Dear Mr. Favero:

In response to the February 28, 2011 letter and March 17, 2011 email received from Heather Gastineau-Lyon of ARCADIS, this notice will transfer ownership and responsibility of the remediation site located at 2701 West Raymond Street in Indianapolis, IN to the *Revitalizing Auto Communities Environmental Response Trust*. The site was previously owned and operated by Remediation and Environmental Liability Management Company, Incorporated (*REALM*) prior to its bankruptcy. Current contact information remains unchanged.

Upon review of the discharge information, it has been determined that regulation of the remediation system for the site previously known as *REALM* located at 2701 West Raymond Street by permit is no longer necessary. The effective date of the termination is **April 15, 2011**.

This site was impacted by the activities of the previous Allison Gas Turbine Division. The closed surface impoundment, identified as USEPA INR000021436, discharges to the Indianapolis sanitary sewers from groundwater extraction, remediation by soil vapor extraction, and monitoring well purge water. Previous limitations on the groundwater extraction of 200 gallons per minute discharge rate will remain. Groundwater is anticipated to be discharged every two to three years. Remediation and purge water is discharged monthly, as needed.

Since the original discharge permit was written, there is one significant change which will affect future groundwater discharges. The Rolls-Royce facility, due west of the surface impoundment, is now permitted and discharging to the Indianapolis sanitary sewer. The surface impoundment shares the discharge line with Rolls Royce. This will now require coordination of discharge during the events that occur every two to three years from the impoundment. Please use the following contact information prior to the discharge from the groundwater extraction wells:

Rolls-Royce Waste Treatment Operations – 317-230-3425
Rolls-Royce Health, Safety, and Environmental – 317-230-3591

Although this facility will no longer be regulated by permit, the *Revitalizing Auto Communities Environmental Response Trust* may discharge wastewater at the usual levels. Restrictions remain for discharges during wet weather combined sewer overflow events, as this facility discharges upstream from CSO 145. The Trust shall notify the city's pretreatment program at least 72 hours prior to any wastewater discharge from the surface impoundment extraction wells, normally occurring once every two to three years. The pretreatment program contact is Mr. Tim Heider at 317-639-7048.

As a user of the city sewer system, The Trust is required to comply with Chapter 671 of the municipal code. The code is available at www.indy.gov. Notification is also required if and when the remediation project is deemed complete by IDEM/EPA and there is no potential for discharge.

In addition, results of monthly flow measurement must continue to be reported to Indianapolis Water on the "Statement of Industrial Waste" form. The completed form is due prior to the 25th of each month following the monitoring period.

If there are any questions, please contact Ms. Nancy Williams at 317-639-7047.

Sincerely,



Richard Wise
Assistant Administrator

RW/nlw
11nlw035

cc: Tim Heider, Pretreatment Coordinator, UW
Wanda Williams, Revenue and Billing Manager, DPW
Pravin Patel, HSE Engineer, Rolls-Royce
✓Heather Gastineau-Lyons, Staff Geologist, ARCADIS