



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mike Braun  
Governor

Clint Woods  
Commissioner

December 24, 2025

### VIA E-MAIL

John Peret  
Phoenix Construction  
401 E. Kilbourn Avenue # 201  
Milwaukee, WI 53202  
[jperet@phoenixconstruction.us](mailto:jperet@phoenixconstruction.us)

Re: Soil Sampling and Management Plan  
Project Maize Data Center  
Former Federal-Mogul Corporation Site, Michigan City, Lake County  
EPA ID # IND016520017

Dear Mr. Peret:

Staff have completed a review of the document entitled "Soil Sampling and Management Plan" (the Plan), dated December 18, 2025, that was submitted in response to the December 8, 2025 Indiana Department of Environmental Management (IDEM) letter (VFC Document # 83902870) requesting additional characterization information for soils generated during site preparation activities at the future Project Maize Data Center (Former Federal-Mogul Corporation Site) located at 402 Royal Road, Michigan City, IN. These responses have been submitted on your behalf by WSP Global, Inc.

This SAP has been reviewed by staff from this Office according to requirements described in 329 IAC 10 and "Solid & Hazardous Waste Programs Analytical Data Deliverable Requirements: Supplemental Guidance". The SAP is considered sufficient with the following changes:

- Page 7, Section 3.1.2: proposes to analyze the following constituents: trichloroethylene (TCE), cis-1,2-dichloroethylene, vinyl chloride, and PCBs. IDEM will require that, in addition to those constituents, the following list of constituents also be sampled and evaluated to concentrations found in Table A-6: arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, endrin, lindane, methoxychlor, toxaphene, 2,4-D, 2,4,5-TP Silvex, benzene, carbon tetrachloride, chlordane, chlorobenzene, chloroform, o-cresol, m-cresol, p-cresol, cresol, 1,4-dichlorobenzene, 1,2-dichlorobethane, 1,1-dichloroethylene, 2,4-dinitrotoluene, heptachlor, hexachlorobenzene, hexachlorobutadiene, hexachloroethane, methyl ethyl ketone, nitrobenzene, pentachlorophenol, pyridine, tetrachloroethylene, trichloroethylene, 2,4,5-trichlorophenol, 2,4,6-trichlorophenol.



- Page 8, Section 3.1.3: proposes a decision unit (DU) comprised of approximately 5,000 yd<sup>3</sup> of soils. IDEM will require that the DU be no greater than 1,000 yd<sup>3</sup>. Additionally, this Section proposes the use of approximately 40 incremental samples (individual sample also referred to as an aliquot) taken per DU. IDEM will require that only 20 aliquot samples be utilized for each decision unit. Additionally, IDEM will require that the aliquot sample locations represent the DU at all depths of the unit, and each aliquot contributing to the overall DU sample must be of an approximate equivalent volume/weight.

If you have questions regarding this matter, please contact Mr. George Ritchotte of the Office of Land Quality's, Industrial Waste Compliance Section at (317) 727-6907, or via email at [gritchot@idem.in.gov](mailto:gritchot@idem.in.gov). In addition, please be aware that additional sampling may be needed based upon the sampling results.

Sincerely,

A handwritten signature in black ink that reads "Lori Freeman". The signature is fluid and cursive, with the first name "Lori" and last name "Freeman" clearly distinguishable.

Lori Freeman, Chief  
Compliance Branch  
Office of Land Quality

cc: LaPorte County Health Department