



## Indiana Brownfields Program an Indiana Finance Authority Environmental Program

100 North Senate Avenue, Room 1275  
Indianapolis, Indiana 46204  
[www.brownfields.in.gov](http://www.brownfields.in.gov)

**Cindy Shively Klem**  
Brownfields Program Counsel  
(317) 234-6018  
[cklem@ifa.in.gov](mailto:cklem@ifa.in.gov)

December 12, 2025

### ***Transmitted Electronically Only***

Chad Sidler and [DHPAReview@dnr.IN.gov](mailto:DHPAReview@dnr.IN.gov)  
Assistant Director for Environmental Review  
Indiana Department of Natural Resources  
Division of Historic Preservation & Archaeology  
402 West Washington St., Room W274  
Indianapolis, IN 46240

Re: City of Fort Wayne, Allen County  
Former OmniSource Site **DHPA #22524**  
1610 North Calhoun Street, Fort Wayne  
*Indiana Brownfields Program*  
**UPDATE TO 2019 FINDING**

Dear Mr. Sidler:

This letter is to serve as the Indiana Brownfields Program's ("Program") update to the INDNR Division of Historic Preservation and Archaeology's Letter dated June 28, 2019 in which it concurred with the EPA's Finding of No Potential Affects for the above-referenced Site. The EPA's Finding and the SHPO's Concurrence were issued in response to the Program's May 10, 2018 Request for a Section 106 National Historic Preservation Act review ("2018 Review Request") for the property located at 1610 North Calhoun Street, Fort Wayne, Indiana ("Site"). The purpose of this letter is to inform the SHPO of the second phase of planned environmental work to be funded by new EPA Brownfields funds awarded to the City of Fort Wayne ("City") and the Program and request an updated Section 106 review. Previously, the 2019 Brownfields RLF Subgrant was used to fund targeted hot spot removals at different locations within the Site, and the new funding will cover additional targeted hot spot removals in different areas of the overall Site footprint. The Program believes the entire Site was vetted in 2019 for the purposes of a Section 106 review for the type of environmental work to be conducted. As a result of the entire Site being described in the 2018 Review Request, and the type of environmental work being planned to be similar in scope to the initial work, the Program believes this update is appropriate. However, the Program would be happy to provide additional information and technical support documents that may be needed to assist in the review process.

### **SITE BACKGROUND:**

**First Phase:** In 2019, the Program awarded the City of Fort Wayne a Subgrant using Brownfields Revolving Loan funds ("RLF funds") awarded to the Program. Prior to execution of the Subgrant, the Program initiated the Section 106 review process in its letter dated May 10, 2018. The letter described

the Site as being thirty (30) parcels, bordered on the east by North Clinton Street, on the south by West 4<sup>th</sup> Street, and on the west by North Calhoun and North Harrison Streets. (See **Exhibit A**, Program’s May 10, 2018 Review Request; SHPO’s June 8, 2018 Request for Additional Information; Program’s July 31, 2018 Response to Request for Additional Information; SHPO’s August 31, 2018 Response/ Request for Work Plan; SHPO’s May 29, 2019 Response/Conclusions; EPA’s May 30, 2019 Finding No Historic Properties Affected; and SHPO’s June 28, 2019 Concurrence.) The Site Map provided in the Program’s May 2018 Review Request described the entire Site, specifically noting that it consisted of 30 parcels. Furthermore, the Program’s July 2018 Response Letter again described the entire OmniSource Site. In particular, it included a description of the new areas to have additional remediation (page 2, seventh paragraph).

***Therefore, from a review of the documents submitted in 2018 and 2019, it appears the entire Site has been previously reviewed for the purposes of historical and archeological issues.***

The 2019 RLF funds were used for limited targeted hot spot soil removal. Based on the previous Site investigations, the chemicals of concern (“COCs”) identified at the Site included: volatile organic compounds (“VOCs”), polynuclear aromatic hydrocarbons (“PAHs”), polychlorinated biphenyls (“PCBs”), Resource Conservation and Recovery Act (“RCRA”) 8 metals (arsenic, barium, cadmium, total chromium, lead, mercury, selenium, and silver), and hexavalent chromium (“Cr VI”) in soil. The thickness of fill on the Site was measured from soil borings and test pit locations during these investigations and was found to vary from non-existent to approximately 10.5-feet thick. Trichloroethylene impacts in groundwater at the Site appear to be isolated, and the source is unknown since this same contaminant was not found in soil.

Between November 5 and 8, 2019, approximately 1,862.5 tons of soil were excavated and removed from the Site and disposed of at the Republic Services Wabash Valley Landfill in Wabash, Indiana. Based on soil confirmation analytical results, some excavation areas were expanded between December 8 and 20, 2019 and again, between January 27 and 28, 2020. Approximately 568.74 additional tons of soil were removed from the Site between January 27 and 29, 2020 and disposed of at the Wabash Valley Landfill. On March 5, 2021, 56.11 tons of treated soil were removed from the site and disposed of at Wabash Valley Landfill.

This first phase of targeted work occurred in the areas now referred to as the North River South Area (Area G1, G2, and G3), Area H, and across Calhoun Street in Area E3. (See **Exhibit B**, Site Map showing areas where targeted work was done and where new targeted work is planned.) The completion of the hot spot removal work at the Site was put on hold until additional EPA Brownfield funds could be secured.

**Second Phase:** The City of Fort Wayne was recently awarded an EPA Brownfields Cleanup Grant providing it with additional funds to be used for targeted hot spot removals at the Site within the area designated as North River South. (This area is within the overall boundary describe in the 2018 Review Request and subsequent documents.) The Program will award a second RLF Subgrant to the City using new RLF Supplemental Funding for targeted hot spot removal in the area identified as Calhoun Street Historic Fill Area on the attached map and additional removal work in the North River South area.

The anticipated use of the Calhoun Street Historical Fill Area (5.14 acres) is single-family, multi-family, and/or townhome residential. Based on the Site’s proposed use for residential purposes, it is recommended that excavation and off-site disposal of approximately 12,235 tons of surficial fill material from the Site. The anticipated use for the North River South Area (8 acres) is commercial and recreational use with the plan to excavate and off-site disposal of approximately 48,000 tons of surficial fill to make way for commercial redevelopment of restaurants, hotels, trails and a field house.

At this time, the Remediation Work Plan has not been prepared. However, the Soil Management Plan (see link below) shows pinpoint locations where exceedances were discovered in the Calhoun Street Historical Fill Area and North River South Area, and the entirety of those Areas would be subject to hot spot removals. **Therefore, the Program requests that the entire Calhoun Street Historical Fill Area and the North River South Area be considered for the purpose of the Section 106 review. The RWP will be forwarded upon its availability for inclusion in the Section 106 review process.**

**Federal Funding Source:** The federal funds being used for the Site’s targeted hot spots are EPA Brownfields funds. The 2019 RLF Subgrant to the City was funded with Brownfield RLF funds awarded to the Program. The new activities will be funded by an EPA Cleanup Grant awarded to the City, as well as a new RLF Subgrant to be entered into between the City and the Indiana Finance Authority using RLF Supplemental Funding awarded to the Program.

**Historical Designation:** *National Register of Historic Places* (Saint Vincent Villa Historic District, listed June 10, 1994; Fort Wayne Park and Boulevard Historic District, listed December 28, 2010)

**Additional Technical Documents for Viewing in IDEM Virtual Filing Cabinet:**

- Remediation Work Plan Implementation Report dated May 29, 2020, IDEM VFC as Document No. [82986991](#) (work completed with 2018/19 RLF Funds)
- Remediation Work Plan Implementation Addendum Report dated April 1, 2021, IDEM VFC as Document No. [83136655](#) (Additional treatment and removal of soil)
- Soil Management Plan dated July 6, 2022 (breaks out levels of risk based on soil level exceedances), IDEM VFC as Document No. [83581536](#).
- Characterization Summary dated March 28, 2024, IDEM VFC as Document No. [83903112](#)

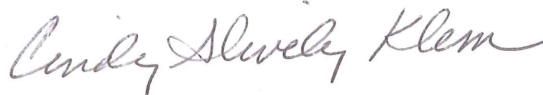
**Addresses Affected:** The common address used for the entire OmniSource Site is 1610 Calhoun Street. As previously discussed, the 2018 Review Request described the entire OmniSource Site as the area to be reviewed by listing street boundaries and providing the site map with parcel numbers. It was not limited to the 1610 N. Calhoun Street address. To be fully transparent, there are individual addresses for the area of the property to be addressed with the new EPA Brownfield funds, which are as follows:

|                                    |  |
|------------------------------------|--|
| 02-07-35-457-003.000-074           | 1610 N. Calhoun St.                                |
| 02-12-02-202-011.000-074           | 1531 N. Calhoun St.                                |
| 02-12-02-202-012.000-074           | 1525 N. Calhoun St.                                |
| 02-12-02-202-013.000-074           | 1523 N. Calhoun St.                                |
| 02-12-02-202-014.000-074           | 1519 N. Calhoun St.                                |
| 02-12-02-202-015.000-074           | 1517 N. Calhoun St.                                |
| 02-12-02-202-016.000-074           | 1513 N. Calhoun St.                                |
| 02-12-02-202-017.000-074           | 1509 N. Calhoun St.                                |
| 02-12-02-202-018.000-074           | 1503 N. Calhoun St                                 |
| 02-12-02-202-010.000-074           | 114 W. 4th St                                      |
| 02-07-35-456-001.000-074           | 1636 N. Harrison St.                               |
| 02-07-35-456-002.000-074           | 1632 N. Harrison St.                               |
| 02-07-35-456-003.000-074           | 115 6th St.  |
| 02-07-35-456-004.000-074           | 1628 N. Harrison St.                               |
| 02-07-35-456-005.000-074           | 1626 N. Harrison St.                               |
| 02-07-35-456-008.000-074           | 1601 N. Calhoun St.                                |
| 02-07-35-457-003.000-074 (partial) | 1700 Blk N. Calhoun St. – 1700 Blk N. Harrison St. |

OmniSource – Letter to SHPO  
December 12, 2025  
Page 4

Thank you for your assistance with this update to the Section 106 review process. To facilitate the appropriate review by the U.S. Environmental Protection Agency, the Program requests that all correspondence from your office to the Program be copied to **Ashley Green, Project Manager, U.S. Environmental Protection Agency, Region 5, 77W. Jackson Blvd., L-17J, Chicago, IL 60604.** Please also send your response to Ms. Green's email address: [green.ashley@epa.gov](mailto:green.ashley@epa.gov). Please feel free to contact me at (317) 234-6018 if you should have any questions.

Sincerely,



Cindy Shively Klem

cc: *via Electronic Transmission*  
Ashley Green, U.S. EPA  
Lori Bebinger, Indiana Brownfields Program  
Lindsey Maskim, City of Fort Wayne  
Brad Gentry, IWM Consulting

**Exhibit A**

2018 - 2019 NHPA/Section 106 Review Documents



Indiana Brownfields Program  
an Indiana Finance Authority Environmental Program

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Indianapolis, Indiana 46204  
www.brownfields.in.gov

Cindy Shively Klem  
Brownfields Program Counsel  
(317) 234-6018  
cklem@ifa.in.gov

May 10, 2018

Mitch Zoll  
Division Director, DNR  
Historic Preservation and Archaeology  
402 W. Washington Street  
W274  
Indianapolis, IN 46204

Re: City of Fort Wayne, Allen County  
OmniSource I, Allen County  
1610 North Calhoun St., Fort Wayne, IN  
Indiana Brownfields Program

Dear Mr. Zoll:

This letter is to serve as the Indiana Brownfields Program's ("Program") formal request for a Section 106 National Historic Preservation Act review by the Indiana Department of Natural Resources' Division of Historic Preservation and Archaeology for the property located at 1610 North Calhoun Street, Fort Wayne, Allen County. The Program is the recipient of a federal Brownfields Revolving Loan Fund (RLF) grant for environmental remediation awarded by the U.S. Environmental Protection Agency. As a condition of use of the federal funds, the Program must ensure a review is conducted to determine the potential applicability of the National Historic Preservation Act to the Site. The federal funds will be used to remediate environmental impacts at the Site, including removal of contaminated soil. The Program is currently using the federal Brownfields grant to address six (6) sites through a Rapid RLF Sub-grant Initiative ("Initiative"). Due to the pace of this initiative, the Remediation Work Plan (RWP) has not yet been prepared by the Program, but will be submitted as an addendum to this letter, if needed, once the bidding is completed and the selection of the environmental contractor has occurred. This letter is to initiate the review process due to the number of sites the Program is submitting for review.

**Federal Funding Source:** The City of Fort Wayne plans to enter into a sub-grant agreement with the Program and will use federal funds to remediate environmental impacts identified on the Site. A Site map is included with this letter as "Exhibit A" for your reference and review. (The Remediation Work Plan will be forwarded as soon as it is received and approved by the Program, if needed.)



**Site Background:** The Site is located at 1610 North Calhoun Street, Fort Wayne, and is comprised of 30 parcels consisting of 28.85 acres of vacant land, in a mixed residential/commercial/industrial area north of downtown Fort Wayne. It is bordered on the east by North Clinton Street, on the south by West 4<sup>th</sup> Street, and North Calhoun and North Harrison Streets on the west. A charter school and an automobile sales and service facility are located to the north of the Site. In addition, 5<sup>th</sup> and 6<sup>th</sup> Streets extend into the west central portion of the Site. Currently, there are building foundations/slabs located on the northwest corner, the southwest corner, and the south central portion on the northeast corner of North Clinton and 4<sup>th</sup> Streets. Historical documentation indicates the Site was first commercially developed in 1902 as a wood products manufacturer, a railroad roundhouse and a junk yard. A freight station was constructed in the junk yard on the southeast corner by 1918. A railroad roundhouse and locomotive repair facility occupied the central portion of the Site through the late 1940s. Other site occupants during that time included an engineering and manufacturing company, a sand and gravel company, a truck equipment and oil company, an auto wrecking yard, an iron and metal company, a pump manufacturer, and a wholesale liquor distributor. Superior Waste Material and Tri State Scrap Baling were located on the southwest portion of the Site in 1950s, and Superior Waste continues to be listed under different company names through the 1980s. In the 1990s, Superior Waste Material was replaced by OmniSource, which operated a scrap iron business. Aerial photographs from the 1960s through the 1990s show most site buildings were located on the west portion of the Site, while the east portion was vacant land covered with piles of debris, which were later removed. Underground storage tanks located at the Site were removed by 2000. Environmental investigations performed in 1998 and 2000 indicate lead, arsenic, cadmium and mercury are in the soil at concentrations exceeding their RDCLs, and PCBs were present in soil samples at concentrations exceeding their RDCL. In 2006, OmniSource ceased operations at the site, and all buildings have been removed. Fill material covers the southeast portion of the Site and has been graded into small hills and seeded with grass. The north portion of the Site consists mostly of vacant land covered with gravel and is overgrown with grass and weeds. There is also a concrete drive reinforced with steel beams on the south central portion of the Site from 4<sup>th</sup> Street, and a brick paved area is located on the southeast corner of the Site along Clinton Street. A Phase I was conducted in 2013 and a Phase II investigation was performed in 2018 by IWM Consulting Group. The results of investigations concluded that metals, PAHs, and PCBs are still detected in the soil and ground water above applicable RCG residential screening levels. At this time, hot spot removal of contaminated soil is planned to remove the environmental impacts at the Site.

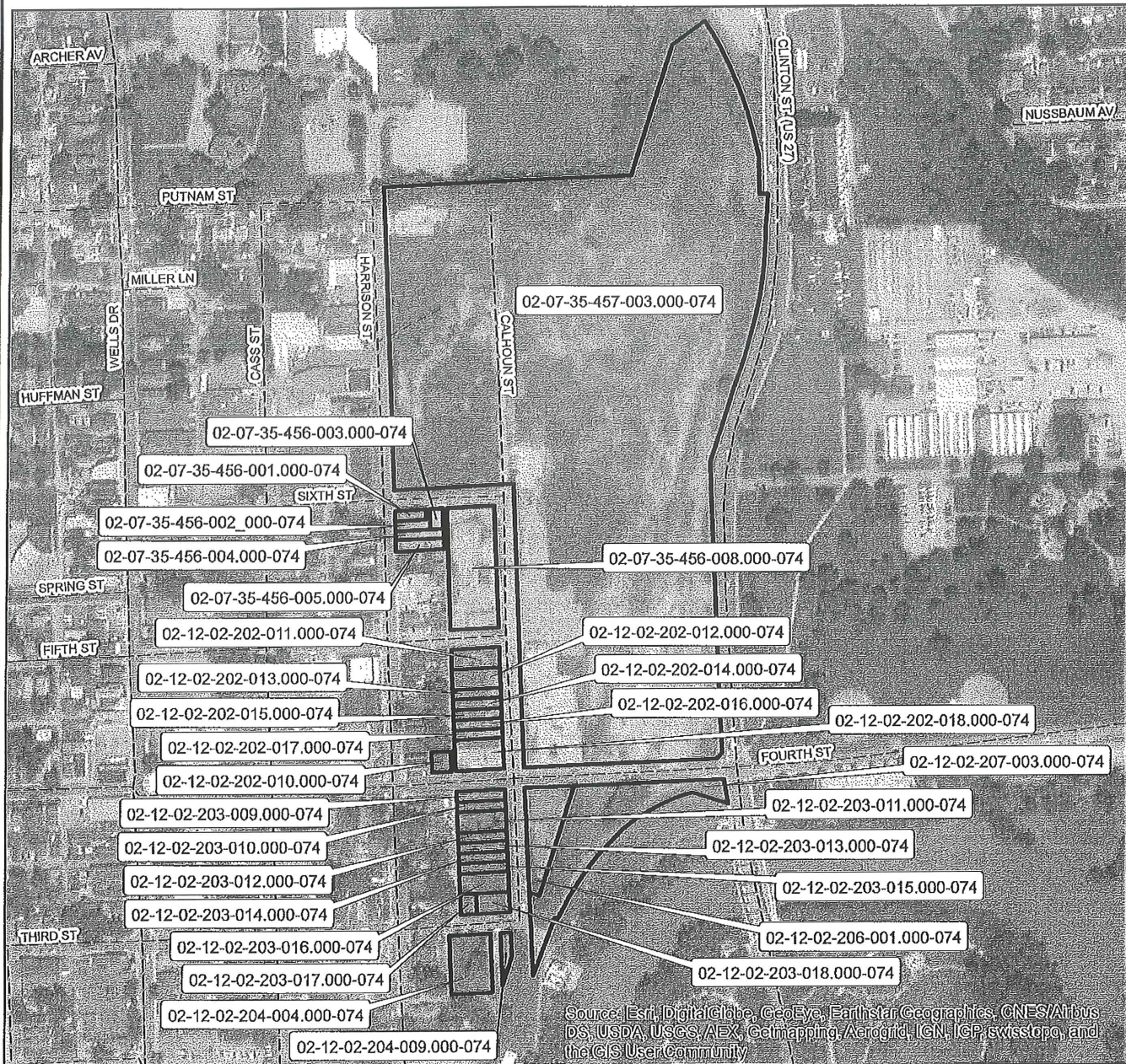
**Historical Status of Site:** The Site is not listed on State or National Registries

**Sources of Historical Information:** Indiana DNR SHAARED Database/Indiana Buildings, Bridges, and Cemeteries Map

Thank you for your assistance with the Section 106 review process. In order to facilitate the appropriate review by the U.S. Environmental Protection Agency, the Program requests that all correspondence from your office to the Program be copied to Patricia Polson, Project Manager, U.S. Environmental Protection Agency, Region 5, 77 W. Jackson Blvd., BB-7J, and Chicago, IL 60604. Please feel free to contact me at (317) 234-6018 should you have any questions.

# Exhibit A

## Indiana Brownfields Program # 4180207 - Real Estate



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Geomapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

**Mapped By:** Mike Hill, IDEM, Office of Land Quality, Science Services Branch, Engineering & GIS Services, May 9, 2018

**Legal Description Info:** Legal descriptions from "ALTA / NSPS Land Title Survey, Address: 1610 N. Calhoun Street, Fort Wayne, Indiana, 46808" by T-E Incorporated, dated 03/03/2017, Sheet 1 of 4

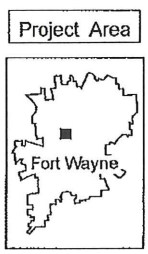
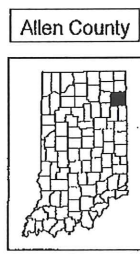
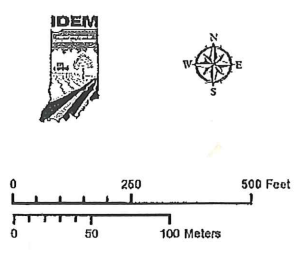
**Orthophoto Info:** Source: DigitalGlobe, Resolution: 0.5 meters, Source Date: 6/29/2016

**PLSS Info:** Section "Heirs of Capt. Wells" Wayne Township, Allen County, IN

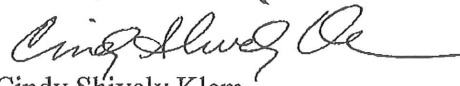
**Disclaimer:** This map is intended to serve as an aid in graphic representation only. This information is not warranted for accuracy or other purposes.

### OmniSource Site

|  |             |
|--|-------------|
|  | Real Estate |
|  | Street      |



Sincerely,

A handwritten signature in cursive script, appearing to read "Cindy Shively Klem".

Cindy Shively Klem

Program Counsel

Encl.

cc: *via electronic transmission*  
Patricia Polston, U.S. EPA



Division of Historic Preservation & Archaeology 402 W. Washington Street, W274 Indianapolis, IN 46204-2739  
Phone 317-232-1646 Fax 317-232-0693 dhpa@dnr.IN.gov



June 8, 2018

Cindy Shively Klem  
Brownfields Program Counsel  
Indiana Finance Authority Environmental Program  
100 North Senate Avenue, Room 1275  
Indianapolis, Indiana 46204

Federal Agency: U.S. Environmental Protection Agency ("EPA")

Re: Project information concerning the removal of contaminated soil around 1610 North Calhoun Street  
using Brownfields revolving loan grant funds (DHPA #22524)

Dear Ms. Shively Klem:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated May 10, 2018 and received on May 11, 2018, for the above indicated project in Fort Wayne, Allen County, Indiana.

In regard to buildings and structures, we have identified the following properties listed in the National Register of Historic Places within the probable area of potential effects:

Saint Vincent Villa Historic District, listed June 10, 1994  
Fort Wayne Park and Boulevard System Historic District, listed December 28, 2010

However, based on the information provided to our office, we do not believe the characteristics that qualify the above identified historic properties for inclusion in the National Register will be diminished as a result of this project.

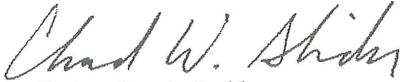
In regard to archaeology, it is our understanding that the project ground disturbing activities consisting of hot spot removal of contaminated soil. Once the remediation work plan has been completed and submitted to our office, we will review that document. We will also need to receive the following:

1. A clear delineation of where the ground disturbance for removal of contaminated soil within the project area will take place.
2. It will also be extremely helpful to know where the ground disturbance will be in relation to the areas which you mentioned had been impacted by fill, and in relation to the areas containing existing building foundations, etc. Please be advised that archaeological resources may exist underneath modern development.
3. Clarification regarding if the brick paved area that was mentioned consists of historic brick.
4. Any additional information (for example, a detailed historical background) regarding the history of this project area would be helpful.

Once the indicated information is received, the Indiana SHPO will resume identification and evaluation procedures for this project. Please keep in mind that additional information may be requested in the future.

*A copy of the revised 36 C.F.R. Part 800 that went into effect on August 5, 2004, may be found on the Internet at [www.achp.gov](http://www.achp.gov) for your reference. If you have questions about archaeological issues please contact Amy Johnson at (317) 232-6982 or [ajohnson@dnr.IN.gov](mailto:ajohnson@dnr.IN.gov). If you have questions about buildings or structures please contact Kim Marie Padgett at (317) 234-6705 or [kpadgett@dnr.IN.gov](mailto:kpadgett@dnr.IN.gov). Additionally, in all future correspondence regarding the above indicated project, please refer to DHPA #22524.*

Very truly yours,



Christopher A. Smith  
Deputy Director

CAS:KMP:ALJ:aj

enc: Patricia Polston, U.S. Environmental Protection Agency  
Cindy Shively Klem, Program Counsel, Indiana Brownfields Program  
Creager Smith, Fort Wayne Historic Preservation Commission



## Indiana Brownfields Program

an Indiana Finance Authority Environmental Program

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**Cindy Shively Klem**  
Brownfields Program Counsel  
(317) 234-6018  
cklem@ifa.in.gov

July 31, 2018

Christopher A. Smith  
Deputy Director  
Department of Natural Resources  
Division of Historic Preservation & Archaeology  
402 W. Washington Street, W274  
Indianapolis, IN 46204-2739

Re: DHPA#22524, 1610 N. Calhoun Street, Fort Wayne, Indiana Brownfields RLF grant funds

Dear Mr. Smith:

This letter is the Indiana Brownfields Program's response to the inquiries raised in the Division of Historic Preservation & Archaeology's letter dated June 8, 2018 regarding the above indicated project in which four concerns were raised. Below are the Program's responses to the questions:

1. A clear delineation of where the ground disturbance for removal of contaminated soil within the project area will take place. **Response: Please see the attached map that shows testing areas on top of a historic Sanborn Map. The remediation that is to take place has not been fully determined. Once the Work Plan is developed it will be provided to DHPA for review.**
2. It will be extremely helpful to know where the ground disturbance will be in relation to the areas which you mentioned had been impacted by fill, and in relation to the areas containing existing building foundations, etc.: **Response: Please refer to the attached map.**
3. Clarification regarding if the brick paved area that was mentioned consists of historic brick. **Response: The mentioned area of brick pavers has been removed from the site. The bricks were salvaged for repairing historic brick streets and alleys in Fort Wayne. This area of brick pavers was formerly associated with the LS & MS (New York Central) Freight Depot that was located at 125-145 E. Fourth Street. The building (built in 1913) was included in the 1996 Fort Wayne Interim Report as site 003-215-16039. However, the building was demolished in 2010. The brick that once spanned the area between North Clinton Street and the east side of the building remained for a few years after the demolition, but this brick pavement had lost its historic context and association with the freight depot. The pavers were no longer significant within a National Register context.**
4. Any additional information (for example, a detailed historical background) regarding the history of this project area. **Response: There are several layers of history and development, and the resulting ground disturbance, that have occurred on this site. Construction of the Wabash and Erie Canal began at Fort Wayne in 1832; the first boat operated on a completed section**



of the Feeder canal in 1834. The feeder supplied water to the main canal. It passed through the northern edge of the site. The feeder was later filled for development.

Much of the site was once the western portion of the adjacent (to the east) Lawton Park. Fort Wayne hosted the 1865 Indiana State Fair on the north bank of the St. Mary's River in what is now Lawton Park, as well as a portion of the site. There has been a great deal of later development and ground disturbance in the overall area.

The Fort Wayne, Jackson, and Saginaw railroad (later the New York Central) constructed its main rail line, sidings, and a large maintenance facility on the site. Construction work on the Lake Shore line to Jackson, Michigan, and the maintenance facility, was begun March 20, 1869, "This (rail)road had received \$200,000 aid in bonds and money and twenty acres of land in Fort Wayne." (Bert Griswold, Pictorial History of Fort Wayne; pgs. 482-483) The twenty acres of land referenced was the western section of what was Lawton Park at the time.

The railroad shop facilities included a locomotive maintenance building, a power plant building, a turntable, offices, coal storage bins and structures, and a water tower. A freight depot was located at the southeast corner of the site, at Clinton and 4<sup>th</sup> Street. All of these structures have been demolished.

Immediately west of the railroad maintenance building was the factory of the Paul Manufacturing Company. This company was a manufacturer of wood products such as wood pulleys. There were several buildings that were used as a saw mill, a wood kiln, a sawing and planning building, and painting and finishing. This company ceased operation prior to 1918 and some of its buildings were later used by the Fort Wayne Engineering & Manufacturing Company.

In the early and mid-twentieth century an interurban line passed through the north end of the site on the former Wabash & Erie feeder canal. The interurban line was abandoned and the rails removed for later development. There is a remaining concrete tunnel structure near the north end of the site, but it will not be affected by this project. The tunnel allowed the interurban line to pass beneath the New York Central line.

North Clinton Street was inserted between Lawton Park and the rail yard later than the establishment of most streets in the area. Other streets were generally established by plats; however Clinton extended the Leo Road more directly toward downtown Fort Wayne. Historic maps are inconclusive, but Clinton and its bridge over the St. Mary's River were likely built in the 1880s.

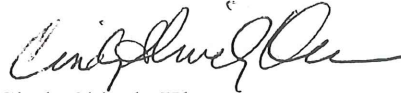
At the western edge of the site, bounded by North Harrison, 6<sup>th</sup> Street, North Calhoun Street, and the former location of the feeder canal, there was once a complex of buildings of the Fort Wayne Engineering & Manufacturing Company. The firm manufactured water pumping and air compressor systems. The buildings included a pattern shop, a small foundry, a "box factory," and a large structure that was a combination of an office building, machine shop, and assembly. These buildings were built in the late 19<sup>th</sup> and early 20<sup>th</sup> century; they have all been demolished. In the period from c.1915 to c.1927, the Lincoln Highway was carried through Fort Wayne on North Harrison, at the west edge of the site. A c.1923 filling station and

**C** service garage was once located near the northwest corner of the site. It was located immediately north of the feeder canal location. This structure has been demolished.

Lastly, the site and many of its buildings were formerly used by a large junkyard/scrap yard operation. Historic aerial photos show that the scrap yard was not yet established in 1938, but it was fully in operation in 1957. By the late 1960s its operations extended over the majority of the site. The operation slowed in the 1990s, and by c.2003 it had dwindled to a handful of buildings in operation for purchasing scrap metals. In the period from 2003 to 2011 all the buildings that remained on the site were demolished and cleared.

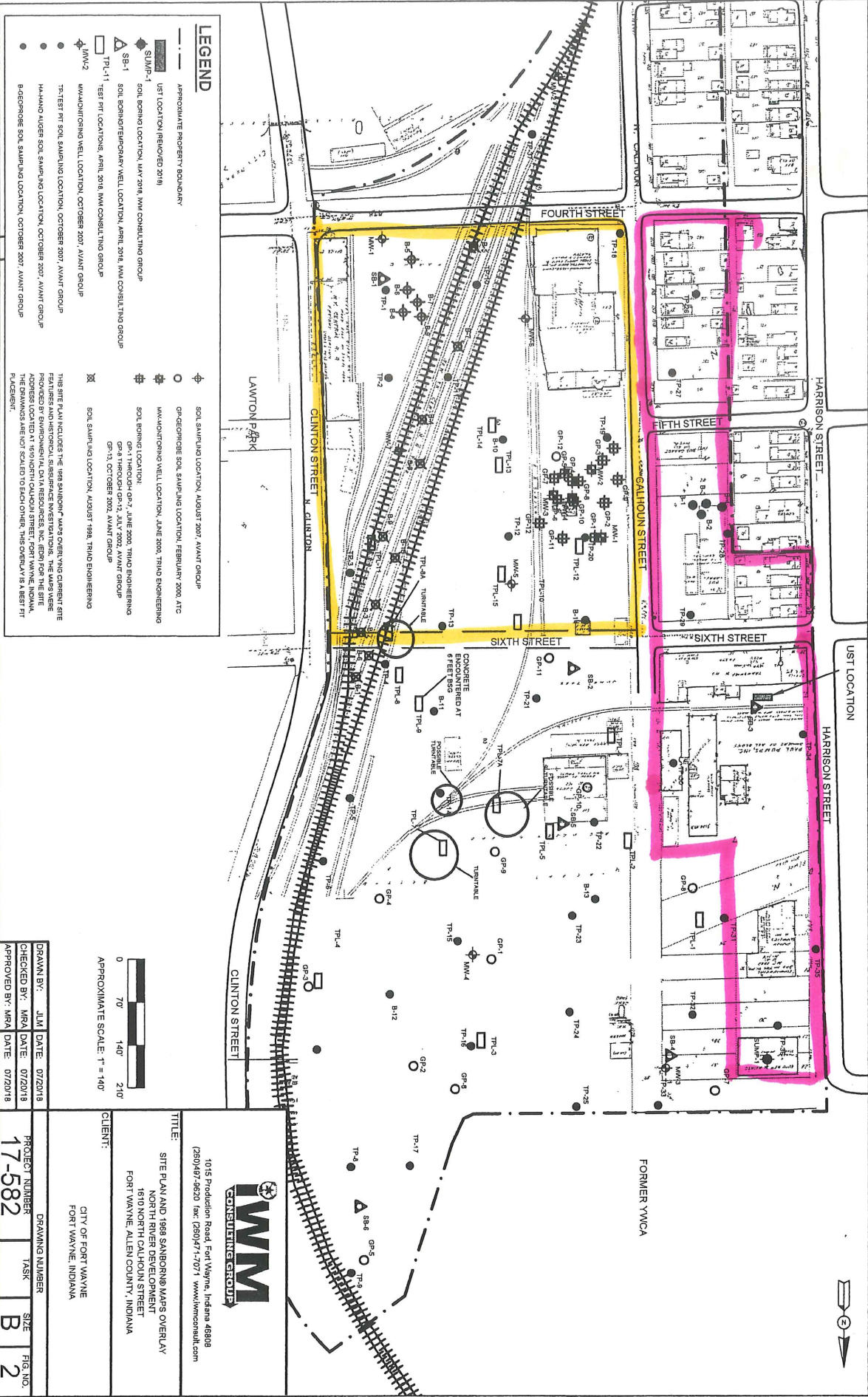
There is debris and evidence of the foundations of buildings and other structures on the site. The open areas were initially disturbed by construction of multiple rail lines and sidings. Later, heavy equipment that moved junk cars and scrap metal would have disturbed the ground; large areas were used for open storage and processing of scrap metals. The locations where rail lines were removed in the 20<sup>th</sup> century, and the locations where buildings were removed in the 21<sup>st</sup> century, were not only disturbed by the initial construction of the facilities, but also by the subsequent demolition process.

Very truly yours,



Cindy Shively Klem  
Program Counsel

cc: (via electronic transmission)  
Patricia Polston, U.S. Environmental Protection Agency  
Andrea Robertson, Indiana Brownfields Program  
Creager Smith, Fort Wayne Historic Preservation Commission





Indiana Department  
of Natural Resources

Eric Holcomb, Governor  
Cameron F. Clark, Director

Division of Historic Preservation & Archaeology-402 W. Washington Street, W274 Indianapolis, IN 46204-2739  
Phone 317-232-1646-Fax 317-232-0693 dhpa@dnr.IN.gov



August 31, 2018

Cindy Shively Klem  
Program Counsel  
Indiana Brownfields Program  
100 North Senate Ave., Suite 1275  
Indianapolis, IN 46204

Federal Agency: U.S. Environmental Protection Agency ("EPA")

Re: Response to request for additional project information concerning the removal of contaminated soil around  
1610 North Calhoun Street using Brownfields revolving loan grant funds (DHPA #22524)

Dear Ms. Klem:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated July 31, 2018 and received on August 6, 2018, for the above indicated project in Fort Wayne, Allen County, Indiana.

Thank you for providing additional information regarding points which were included in our letter dated June 8, 2018. Per your current submission, the remediation that is to take place has not been fully determined. Once the work plan is developed and submitted to our office, the Indiana SHPO will resume identification and evaluation procedures for this project, including commenting on the proposed project's potential to impact intact archaeological resources. Please keep in mind that additional information may be requested in the future.

*A copy of the revised 36 C.F.R. Part 800 that went into effect on August 5, 2004, may be found on the Internet at [www.achp.gov](http://www.achp.gov) for your reference. If you have questions about archaeological issues please contact Amy Johnson at (317) 232-6982 or [ajohnson@dnr.IN.gov](mailto:ajohnson@dnr.IN.gov). Additionally, in all future correspondence regarding the above indicated project, please refer to DHPA #22524.*

Very truly yours,

Christopher A. Smith  
Deputy Director  
Department of Natural Resources

CAS:ALJ:aj

emc: Patricia Polston, U.S. Environmental Protection Agency  
Creager Smith, Fort Wayne Historic Preservation Commission



Division of Historic Preservation & Archaeology-402 W. Washington Street, W274 Indianapolis, IN 46204-2739  
Phone 317-232-1646-Fax 317-232-0693 [dhp@dnr.IN.gov](mailto:dhp@dnr.IN.gov)



May 29, 2019

Cindy Klem  
Program Counsel  
Indiana Finance Authority  
100 North Senate Ave., Ste 1275  
Indianapolis, IN 46204

Federal Agency: Environmental Protection Agency

Re: Additional project information concerning the removal of contaminated soil around 1610 North Calhoun Street using Brownfields revolving loan grant funds (DHPA # 22524)

Dear Ms. Klem:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials received on May 3, 2019, for the above indicated project in Fort Wayne, Allen County, Indiana.

As was stated previously, in regard to buildings and structures, we have identified the following properties listed in the National Register of Historic Places within the probable area of potential effects:

Saint Vincent Villa Historic District, listed June 10, 1994  
Fort Wayne Park and Boulevard System Historic District, listed December 28, 2010

However, based on the information provided to our office, we do not believe the characteristics that qualify the above identified historic properties for inclusion in the National Register will be diminished as a result of this project.

In terms of archaeology, no currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places have been recorded within the proposed project area. No archaeological investigations appear necessary provided that all project activities remain within areas disturbed by previous construction/demolition and ground disturbance won't impact any intact features (see below).

However, if there are intact elements such as building foundations or other remnants of historic structures, sites, or features, and they will be impacted by proposed project ground disturbance, then archaeological documentation of those elements would be needed. The survey would have to be done in accordance with the "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation" (48 F.R. 44716). A description of the survey methods and results would need to be submitted to the Division of Historic Preservation and Archaeology for review before we could comment further (see list of qualified professional archaeologists at the DHPA website link [https://www.in.gov/dnr/historic/files/hp\\_archo.pdf](https://www.in.gov/dnr/historic/files/hp_archo.pdf)).

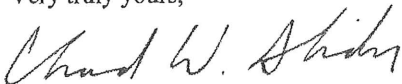
If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and 29) requires that the discovery must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and 29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. 800.

At this time, it would be appropriate for the Environmental Protection Agency to analyze the information that has been gathered from the Indiana SHPO, the general public, and any other consulting parties and make the necessary determinations and findings. Please refer to the following comments for guidance:

- 1) If the Environmental Protection Agency believes that a determination of "no historic properties affected" accurately reflects its assessment, then it shall provide documentation of its finding as set forth in 36 C.F.R. § 800.11 to the Indiana SHPO, notify all consulting parties, and make the documentation available for public inspection (36 C.F.R. §§ 800.4[d][1] and 800.2[d][2]).
- 2) If, on the other hand, the Environmental Protection Agency finds that an historic property may be affected, then it shall notify the Indiana SHPO, the public and all consulting parties of its finding and seek views on effects in accordance with 36 C.F.R. §§ 800.4(d)(2) and 800.2(d)(2). Thereafter, the Environmental Protection Agency may proceed to apply the criteria of adverse effect and determine whether the project will result in a "no adverse effect" or an "adverse effect" in accordance with 36 C.F.R. § 800.5.

*A copy of the revised 36 C.F.R. Part 800 that went into effect on August 5, 2004, may be found on the Internet at [www.achp.gov](http://www.achp.gov) for your reference. If you have questions about archaeological issues please contact Amy Johnson at (317) 232-6982 or [ajohnson@dnr.IN.gov](mailto:ajohnson@dnr.IN.gov). If you have questions about buildings or structures please contact Kim Padgett at (317) 234-6705 or [kpadgett@dnr.IN.gov](mailto:kpadgett@dnr.IN.gov). Additionally, in all future correspondence regarding the above indicated project, please refer to DHPA #22524.*

Very truly yours,



Beth K. McCord  
Deputy State Historic Preservation Officer

BKM:ALJ:aj

emc: Creager Smith, Fort Wayne Historic Preservation Commission  
Patricia Polston, U.S. Environmental Protection Agency



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

May 30, 2019

Beth K. McCord  
Deputy State Historic Preservation Officer  
Department of Natural Resources  
Division of Historic Preservation and Archaeology  
402 West Washington Street, Room W 274  
Indianapolis, Indiana 46204-2739

Re: DHPA #22524 (OmniSource, located 1610 N. Calhoun Street, FT. Wayne, IN)

Dear Ms. McCord:

At this time, US EPA believes that all the available documentation regarding the federal involvement, description of area including photographs, maps, drawings and remediation plans has been reviewed. In addition, Indiana Finance Authority (IFA) and Indiana State Historic Preservation Officer (Indiana SHPO) have taken all the necessary steps to identify any potential historic properties. Pursuant to 36 C.F.R. Section 800.11(d), US EPA determines that a finding of no historic properties affected accurately reflects the assessment for the site.

If you have any questions, please do not hesitate to contact me at 312-886-8093 or by e-mail at [polston.patricia@epa.gov](mailto:polston.patricia@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia J. Polston", with a long horizontal flourish extending to the right.

Patricia J. Polston  
Project Officer/Project Manager  
Brownfields & NPL Reuse Section #1  
US EPA SB-7J

Cc: Cindy Klem, IFA



Division of Historic Preservation & Archaeology 402 W. Washington Street, W274 Indianapolis, IN 46204-2739  
Phone 317-232-1646 Fax 317-232-0693 [dhpa@dnr.IN.gov](mailto:dhpa@dnr.IN.gov)



June 28, 2019

Patricia Polston  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Federal Agency: U.S. Environmental Protection Agency ("EPA")

Re: Environmental Protection Agency's finding of "no historic properties affected" concerning the removal of contaminated soil around 1610 North Calhoun Street using Brownfields revolving loan grant funds (DHPA #22524)

Dear Ms. Polston:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated May 30, 2019 and received on June 3, 2019, for the above indicated project in Fort Wayne, Allen County, Indiana.

We see no reason to object with the U.S. Environmental Protection Agency's May 30, 2019 finding that there are no historic buildings, structures, districts, objects, or archaeological resources within the area of potential effects that will be affected by the above indicated project.

This identification is subject to the following condition:

- The project activities remain within areas disturbed by previous construction/demolition and ground disturbance won't impact any intact features (see below).

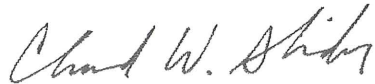
However, if there are intact elements such as building foundations or other remnants of historic structures, sites, or features, and they will be impacted by proposed project ground disturbance, then archaeological documentation of those elements would be needed. The survey would have to be done in accordance with the "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation" (48 F.R. 44716). A description of the survey methods and results would need to be submitted to the Division of Historic Preservation and Archaeology for review before we could comment further (see list of qualified professional archaeologists at the DHPA website link [https://www.in.gov/dnr/historic/files/hp\\_archo.pdf](https://www.in.gov/dnr/historic/files/hp_archo.pdf)).

If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and 29) requires that the discovery must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and 29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. 800.

Patricia Polston  
June 28, 2019  
Page 2

If you have questions about archaeological issues please contact Amy Johnson at (317) 232-6982 or [ajohnson@dnr.IN.gov](mailto:ajohnson@dnr.IN.gov). If you have questions about buildings or structures please contact Kim Marie Padgett at (317) 234-6705 or [kpadgett@dnr.IN.gov](mailto:kpadgett@dnr.IN.gov).

Very truly yours,



Beth K. McCord  
Deputy State Historic Preservation Officer

BKM:KMP:ALJ:aj

emc: Cindy Klem, Indiana Finance Authority  
Creager Smith, Fort Wayne Historic Preservation Commission

**Exhibit B**

New Site Map

