



***Procedures to Request a Determination of Petroleum Site Eligibility
Required for U.S. EPA Brownfield Grants***

When requesting a petroleum eligibility determination from the Indiana Department of Environmental Management (IDEM), please provide written responses to the items listed below. If you are unable to provide the information related to any of the items, then please state why that information is unavailable. Requests and/or questions should be emailed to Andrea Robertson, Indiana Brownfields Program Technical Staff Coordinator, at aroberts@ifa.IN.gov and to Michele Oertel, Indiana Brownfields Program Federal Funding & Community Relations Coordinator, at moertel@ifa.IN.gov. Subsequent to its review of a request, the IDEM will provide a written response determining eligibility for use of federal grant funds on the site. Further information regarding petroleum eligibility determinations may be found in the U.S. EPA's Brownfields Assessment, Revolving Loan Fund and Cleanup Grant Guidelines. The respective guidelines for the three types of U.S. EPA grants are available on the web at: <https://www.epa.gov/brownfields/apply-brownfields-grant-funding>.

Date of Request: 03/29/2019

Site Name(s): Former Trelleborg Automotive

Site Address(es): One General Street, Logansport, IN 46947

Site Acreage: 11.8

Assessment or cleanup activities: Phase II ESAs and Remediation Planning

Letter recipient

Name: Mrs. Mercedes Brugh, Logansport Deputy Mayor

Affiliation: City of Logansport (Logansport Coalition Grant Administrator)

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The following information must be provided in order for the IDEM to make a petroleum eligibility determination:

1. Site Description.

a) Site name(s): Former Trelleborg Automotive

b) Site address: 1 General Street, Logansport, Indiana, 46947

c) Site is contaminated by (free product) petroleum and hazardous substances

d) Operational history and current use(s):

1885 – early 1940's: Residential Properties
1948 – 2005: Automobile rubber tire and component manufacturing plant
2005 – 2007: Vacant
1/5/2007 – 3/2/2007: Vacant; Dale A Hunt (Owner)
3/2/2007 – 11/12/2014: Vacant; 1 General St. LLC (Owner)
11/12/2014 - Present: Vacant; City of Logansport (Owner)

e) Environmental concerns:

- Former use/generation of hazardous wastes consisting of chlorinated solvents, petroleum-based solvents, uncured rubber, acids, and zinc phosphate plating processes. VFC documents indicate the presence of three registered USTs located on the site and records of removal were not found. The tanks contained paraffinic oil and petroleum oil (two 6,000-gallon tanks) as well as Stoddard solvent (2,000-gallon), that were likely closed in place. Heating oil may have been used at the site and may have been stored in an AST or in drums.
- Historical releases of process oil (paraffin oil) (VFC# [60156693](#) and [52239208](#)), acid and zinc phosphate spills (VFC# [60158596](#)), and a removal of chlorinated solvent impacted soil from the site found in RCRA inspections and Emergency response documents on the VFC dating from 1987 through 1998 (VFC# 47594552).

2. **Previous Assessments.** A Phase I Environmental Site Assessment (ESA) was conducted for the City of Logansport by Bruce Carter Associates, LLC / BCA Environmental Consultants, LLC (BCA), dated April 2, 2013. At the request of the City, a Phase II ESA was conducted by BCA, dated October 25, 2013. Both assessments were funded through a previous U.S. EPA Brownfield Assessment Grant to the City of Logansport (hazardous substances eligibility determination). The Phase II ESA identified soil and groundwater impacts from chlorinated solvents and petroleum compounds and soil impacts from metals including arsenic and thallium. Soil and groundwater samples revealed an area of measurable free petroleum product in the central portion of the site, under the former factory's concrete slab. Chlorinated solvents were found above regulatory limits in the groundwater under the Subject Site, in the west-central area of the Site.

IDEM issued a letter regarding Special Notice of Potential Liability and Request for Information (Demand Letter) to Trelleborg Automotive USA, Inc. and to 1 General Street, LLC dated January 29, 2014. BCA was retained by 1 General Street to respond to IDEM and conduct investigation of the site. BCA submitted an Initial Site Investigation Work Plan to IDEM dated March 20, 2014 (VFC# [69872704](#)). The ISI Work Plan outlined an investigation to delineate the nature and extent of arsenic, free-product, chlorinated solvents and petroleum at the Subject Site.

An IDEM *Initial Site Investigation Implementation Request letter* (VFC# [69902049](#)), dated April 9, 2014, approved the implementation of BCA's ISI Work Plan. The IDEM letter approved the aforementioned tasks and requested additional information to be included in the ISI report.

BCA completed the ISI Report dated February 27, 2015 and submitted to IDEM. In response to the ISI Report the IDEM released a Comment Letter (VFC # [80096966](#)) dated July 24, 2015, in which it requested Further Site Investigation (FSI) activities.

BCA completed the FSI activities and submitted the FSI Report dated August 29, 2016, to IDEM. In response to the FSI Report, IDEM responded in a FSI Comment Letter (VFC# [80383078](#)) dated December 1, 2016, in which IDEM requested additional FSI activities. BCA completed and submitted the 2nd FSI Report (dated June 30, 2017) to IDEM. In response to the 2nd FSI Report the IDEM released a Comment Letter (VFC # [80538782](#)) dated October 16, 2017, in which it requested quarterly monitoring and development of a Remediation Work Plan.

At the request of the City, a Phase II ESA was conducted on the southern half (parking lot) of the site in preparation of redevelopment. The investigation was completed on December 7, 2018 by BCA and was provided to the IDEM State Site Cleanup (VFC # [82670939](#)).

No information regarding any other assessments has been found in the IDEM VFC.

3. **Areas of Concern.**

4. **Current and Immediate Past Owners.** According to Cass County Records, the subject site is owned by:

City of Logansport: Current Owner: 11/12/2014 to present – Site is vacant and is currently used for storage of 3 retired railroad cars and assorted signage for the Indiana Transportation Museum.

One General LLC: previous owner from 3/2/2007 – 11/12/2014 – demolished the structures and used the vacant site for landscape aggregate (rock/stone/gravel) sorting and storage.

Dale A. Hunt: Previous owner from 1/5/2007 – 3/2/2007 (became One General LLC)

5. **Acquisition of Site.** The Current Owner (City of Logansport) acquired the property in 2014.

6. **No Responsible Party for the Site.** The current and/or immediate past owners(s) did not dispense or dispose of petroleum or petroleum products. Current or immediate past owners are not known to have exacerbated existing petroleum contamination at the site. According IDEM VFC files, there were reported oil spills or releases (VFC# [60156693](#) and [52239208](#)) in 1990 during plant operations under GenCorp Automotive.

7. **Assessed or Cleaned Up by a Person Not Potentially Liable.** The City of Logansport (Grantee & Applicant) has never dispensed or disposed of petroleum or petroleum product or exacerbated the existing petroleum contamination at the site.

Paraffin oil free product was discovered during Phase II activities and was subsequently delineated during ISI and FSI investigations. Attempts to remove or reduce the free product is conducted on a monthly basis using bailing techniques.

8. **Relatively Low Risk.** The risk at this site is unknown. The site is not receiving or using LUST Trust Fund monies; and is not eligible.

9. **Judgments, Orders, or Third-Party Suits.** None known.

10. **Subject to Resource Conservation and Recovery Act (RCRA).** The site is not subject to any order under section 9003(h) of the Solid Waste Disposal Act (RCRA Corrective Action).

11. **Financial Viability of Responsible Parties.** A search of the Indiana Secretary of State Business Directory Online Database returned no matches for current business entities located at One General Street or 1 General Street in Logansport.

A search for Trelleborg Automotive (Previous Operator) returned a single canceled listing at 400 Aylworth Ave, South Haven, Michigan, and is shown as a foreign for-profit corporation.

A search for GenCorp Automotive (Previous Operator) returned a single merged listing at 175 Ghent Rd, Fairlawn, Ohio, and is shown as a foreign for-profit corporation. This listing is also shown as Diversitech General Inc. Contact address is listed as 1 General Street, Akron Ohio

A search for BTR Antivibration Systems, Inc (Previous Operator) returned a single merged (Metzeler Automotive Profile Systems Iowa, Inc.) listing at 6920 Pointe Inverness Way, Ft. Wayne, IN, and is shown as a domestic for-profit corporation.