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### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb Governor

Brian C. Rockensuess Commissioner

July 9, 2024

# VIA EMAIL

Small Parts Inc. c/o Nick Savini 600 Humphrey Street & 112 Mildred Street Logansport, IN 46947 email: <u>nicsav@smallpartsinc.com</u>

# Re: Groundwater Monitoring Report (GMR)

Small Parts Inc. 600 Humphrey & 112 Mildred Street Logansport, Cass County State Cleanup Site #0000927

Dear Mr. Savini:

The Indiana Department of Environmental Management (IDEM) has reviewed the *Groundwater Monitoring Report (GMR)*, prepared and submitted by Cornerstone Environmental Health & Safety, Inc. Groundwater Monitoring Report (GMR) was submitted in response to a release(s) of hazardous substances at the Small Parts Inc. located at 600 Humphrey Street & 112 Mildred Street, Logansport, Cass County (Site). The Groundwater Monitoring Report (GMR) is available in IDEM's Virtual File Cabinet (VFC) as document #<u>83632182</u>. The VFC is located on IDEM's website at <u>https://vfc.idem.in.gov/</u>.

The document was evaluated based on IDEM's *Risk-based Closure Guide* ("RCG" or "R2") and *State Cleanup Program Guide* non-rule policy documents and *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW846) Third Edition, Update III. Non-rule policy documents are located at: <u>https://www.in.gov/idem/resources/nonrule-policies/effective-nonrule-policies/</u>. Based on the data submitted, another round of paired SGss/IA (soil gas, subslab & indoor air) sampling, during summer, is necessary to account for seasonal variability. The following IDEM comments must be addressed in the Further Site Investigation Report (FSI).

### Comments

 Analysis of the Vapor Intrusion (VI) results from the December 2023 VI investigation (VFC #83597593) corroborates Cornerstone's conclusion that the contamination source is off-site and upgradient, as detailed in the February 23, 2024 report (VFC# 83602091). However, an additional





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round of paired SGss/IA sampling must be conducted during the summer to account for potential seasonal variability.

IDEM supports Cornerstone's proposal to cease groundwater monitoring. However, monitoring
wells should not be abandoned until IDEM has assessed their potential integration into the
monitoring network of the site to the north (SCP Site #0000928).

### Conclusions

IDEM acknowledges Small Parts Inc.'s decision to discontinue groundwater monitoring at the 600 Humphrey Street and 112 Mildred Street properties. However, an additional round of paired SGss/IA sampling is necessary to account for potential seasonal variability. While sufficient data exists regarding the on-site contamination, it is crucial not to abandon the monitoring wells to support IDEM's ongoing monitoring efforts at the adjacent site to the north.

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the Further Site Investigation Report to IDEM within 60 days of the date of this letter.

To reduce paper usage, reports are required to be submitted via **State Cleanup's e-Submission Portal** (ESP). Paper copies are no longer required or accepted; however, paper copies of figures and tables may be requested by the Project Manager.

To request access to the ESP, complete State Agency Form 57103, available on IDEM's website at <u>idem.in.gov/myesubmission</u>. Please note that the size limit for an electronic document remains at 75 megabytes (MB) per IDEM Office of Land Quality electronic document submittal guidelines, which are available online at: <u>www.in.gov/idem/landquality/2368.htm</u>.

If you have any questions or comments concerning this matter, please contact me by phone at 317-233-0131 or by email at hhuntley@idem.in.gov, or you may call IDEM's toll free number at (800) 451-6027 and ask for Hayley Huntley.

Sincerely,

Hayley R Huntley

Hayley Huntley State Cleanup Section Office of Land Quality

ec: IDEM Site #0000927

Kevin Mallin, Cornerstone Environmental Health and Safety, email: <u>kmallin@cornerenviro.com</u> Cass County Health Department, email: <u>dan.musselman@co.cass.in.us</u>

If a technical dispute arises and cannot be resolved in a timely manner, please see IDEM's website for information about appealing technical decisions through the Office of Land Quality's Technical Review Panel pilot program at: <a href="http://www.in.gov/idem/cleanups/2370.htm">www.in.gov/idem/cleanups/2370.htm</a>.