



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Eric J. Holcomb  
Governor

Brian C. Rockensuess  
Commissioner

July 23, 2024

Marsha Parham-Green  
Executive Director  
Housing Authority of South Bend/  
South Bend Affordable Housing Corporation  
501 Alonzo Watson Drive  
South Bend, IN 46601

Re: **No Further Action Determination  
Pursuant to Risk-based Closure Guide  
LUST POSI**

Rabbi Shulman Plaza & Monroe Circle  
Apartments  
628 Western Avenue  
South Bend, St. Joseph County  
Brownfield #4230401

Dear Ms. Parham-Green:

Indiana Brownfields Program (Program) staff have reviewed the following reports documenting environmental activities conducted at the property located at 628 Western Avenue in South Bend, St. Joseph County (Site), which were funded in part by the Program through its Petroleum Orphan Site Initiative (POSI) to facilitate redevelopment of the Site. All documents were prepared by Heartland Environmental Associates, Inc. (Heartland) and may be viewed electronically by searching online by the noted document numbers referenced below in Indiana Department of Environmental Management's (IDEM's) Virtual File Cabinet (VFC) accessible through IDEM's website.

- *Phase I Environmental Site Assessment* (Phase I ESA), dated November 5, 2021 (Document #83466502)
- *Limited Phase II Environmental Site Assessment Report* (Limited Phase II ESA Report), dated July 19, 2022 (Document #83465824)
- *Ground Penetrating Radar Survey Report*, dated January 9, 2023 (Document #83465819)
- *Underground Storage Tank Closure and Limited Subsurface Investigation Report* (UST Closure & LSI Report), dated November 20, 2023 (Document #83568514)

## Site Description and History

The approximately 8.81-acre Site is one parcel identified by the State by parcel identification number (PIN) 71-08-11-426-001.000-026. The Site is developed with a vacant six-story apartment building located near the northern portion of the Site. Historically, 17 two-story residential buildings comprising 90 single-family townhomes were present on the southern portion of the Site, but the buildings have been razed. Prior to Site redevelopment, the remaining on-Site apartment building will be razed. According to available records, the Site has been owned by the Housing Authority of South Bend since 1946. Plans for the Site are assumed to remain low income residential.

Properties adjoining the Site are as follows: to the north, Western Avenue followed by a church and parish center; to the east, South Taylor Street followed by parking for Four Winds Field (baseball field) and office buildings; to the southeast (near the Site's southeastern border), commercial business (Claey's candy manufacturer) followed by South Taylor Street and parking for Four Winds Field beyond; to the west, Alonzo Watson Drive followed by an office and apartment buildings; and, to the south (near the Site's southeastern border), a commercial business (Claey's candy manufacturer) with the remainder of Site (to the southwest) bordered by South Street followed by a railroad with industrial properties beyond.

## Environmental Conditions

For purposes of evaluating Site conditions for closure, sample analytical results were compared to IDEM's *Risk-based Closure Guide* (R2) (July 8, 2022 and applicable revisions) published levels as follows: soil samples collected at depths between 0 and 10 feet below ground surface (bgs) were compared to R2 residential and commercial soil published levels (RSPLs and CSPLs, respectively); soil samples collected between 0 and 15 feet bgs were compared to the excavation worker soil published levels (XSPLs); and, soil samples collected at depths greater than 15 feet bgs were not evaluated for purposes of closure because of the unlikely risk of exposure to soil at that depth. Groundwater samples were compared to groundwater published levels (GWPLs). If total and dissolved/filtered groundwater samples were collected per Section 2.2.5 of R2 and IDEM Nonrule Policy Document (NPD) Waste-0057, only the dissolved/filtered groundwater samples were compared to GWPLs.

### *Phase I ESA – November 2021*

The November 2021 Phase I ESA identified the following recognized environmental conditions (RECs) associated with the Site:

- According to historical fire insurance maps, a railroad spur was located on the southern portion of the Site with an associated vault structure and elevator which may have been utilized for the loading, unloading, transporting, and/or storage of various products in bulk, some of which would have likely been hazardous chemicals or petroleum products. The potential exists that these

operations may have resulted in the unreported and/or unquantified spillage and/or release of such chemicals, which potentially contaminated subsurface media. The historical operation of this railroad spur with the potential presence of chemical releases to subsurface media resulting from its operation represents a REC.

- Several historical commercial and industrially developed properties are located near the Site including a former hazardous waste treatment and disposal facility and a former manufacturing facility, both located to the south/southwest and hydraulically upgradient of the Site. In addition, historical gasoline service stations, automobile repair garages, scrap yards, historical dry-cleaner facilities, and a railroad depot were identified near the Site. Documented soil and groundwater contamination with chlorinated solvents, specifically tetrachloroethene (PCE) and trichloroethene (TCE), have been identified at these off-Site facilities which have the potential to have migrated towards and potentially contaminated subsurface media on the Site.

In addition to the above-noted RECs, the November 2021 Phase I ESA identified the following non-scope issues:

- Varying amounts of suspected asbestos containing materials (ACMs) and minor amounts of peeling/chipping paint were observed within the on-Site buildings. Suspect ACMs observed included acoustical ceiling tiles, sheetrock and plaster walls, and resilient vinyl flooring materials and associated materials, insulating materials and asphalt roofing materials. Based on the age of construction of the Site building(s), the potential exists that these materials are asbestos containing and/or contain lead-based paint.

#### *Limited Phase II ESA Report - July 2022*

In June 2022, 10 soil borings (SB-1 through SB-10) were advanced to a maximum depth of 25 feet bgs and completed as temporary monitoring wells across the Site. A total of 13 soil samples were collected and analyzed for volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), Resource, Conservation and Recovery Act (RCRA) 8 metals, and asbestos. Soil analytical results detected a concentration of lead at 445 parts per million (ppm) above its RSPL in one location approximately 400 feet south of the underground storage tank (UST) pit. Although lead was detected in soil at a concentration above its RSPL, the average concentration of lead in Site soil calculated using all 16<sup>1</sup> soil samples collected from the Site was determined to be 33.48 ppm which is below both the 200 ppm residential soil lead Regional Screening Level (RSL) established by the United States Environmental Protection Agency (US EPA) and IDEM's RSPL for lead of 400 ppm. Therefore, the Program concludes that lead concentrations in on-Site soil present no threat to human health or the environment. No other constituents analyzed in soil were detected at levels

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<sup>1</sup> This includes three soil samples collected from soil borings SB-11, SB-12 and SB-13 following UST removal.

above applicable R2 published levels. Refer to Table 1, below, for a summary of soil analytical results above applicable R2 published levels.

**TABLE 1**  
**June 2022 Soil Concentrations**  
**Exceeding Applicable IDEM R2 Published Levels**

Sample ID	Depth (feet bgs)	Contaminant Detected & Results (parts per million (ppm))
		Lead
SB-6	3-5	<b>445</b>
Calculated Average		33.48
<b>USEPA RSL*</b>		200
<b>RSPL</b>		400
<b>CSPL</b>		800
<b>XSPL</b>		1,000

Notes: **bold** = above R2 Residential Soil Published Level

bgs = below ground surface

\*= The United States Environmental Protection Agency updated the residential soil lead Regional Screening Level (RSL) on January 17, 2024.

Groundwater samples were collected from nine locations (SB-3 had insufficient recharge for collection of a groundwater sample) and analyzed for VOCs, PAHs, and total and dissolved RCRA 8 metals. No constituents analyzed in groundwater were detected at levels above applicable R2 published levels.

Also in June 2022, six soil gas probes (SG-1 through SG-6) were advanced to a maximum depth of 5 feet bgs across the Site. Exterior soil gas samples were collected and analyzed for VOCs with no constituents detected at levels above applicable R2 published levels.

#### *Ground Penetrating Radar Survey Report – January 2023*

In December 2022, a Ground Penetrating Radar (GPR) survey was conducted in an area approximately 60 feet by 40 feet near the northern portion of the Site where two USTs were suspected to be located. Survey results identified anomalies consistent with two 5,000-gallon USTs each measuring 10 feet by 15 feet. The suspected USTs were located just south of the on-Site building with one suspected product/vent line running approximately 20 feet east of the USTs and then north into the on-Site building. The GPR survey indicated a rectangular shaped vault was situated above the northern ends of the USTs. A manway accessing the vault was opened and the interior of the vault was found to be partially flooded.



### *UST Closure & LSI Report – November 2023*

In September 2023, two 15,000-gallon USTs, installed circa 1959, were identified within one common tank pit just south of the on-Site building. The USTs were reportedly utilized to store heating oil and/or fuel oil for on-Site building. The exact dates of operation of the USTs are unknown but they had not been in operation for a significant period of time.

A total of two concrete vaults were removed from atop each of the USTs and reportedly power washed as part of cleaning activities. The two USTs were removed from the common tank pit, cut open, and cleaned prior to removal. Approximately 35,500 gallons of petroleum-impacted water and residual tank sludge were generated during UST/vault cleaning and properly disposed. The cleaned USTs, associated piping, and concrete vaults were removed from the Site and properly disposed. Due to the extensive network of above and underground utilities, the product line connecting to the apartment building was removed to the extent practicable with the remaining product line left in-place.

Following UST removal, a total of 15 confirmatory soil samples (SW-1 through SW-8, BOT-1 through BOT-6 (including one duplicate (FD-1)) were collected from the sidewalls and bottom excavation. In addition, three backfill samples (BF-1 through BF-3) were collected from the excavated overburden soil. All confirmatory soil and backfill samples were analyzed for VOCs and PAHs. No constituents analyzed in soil were detected at levels above applicable R2 published levels. The UST excavation pit was then backfilled with clean overburden and finished to grade with imported crushed concrete.<sup>2</sup>

Groundwater was not encountered during excavation activities and, therefore, was not collected during the confirmatory soil sampling process. To further evaluate groundwater, four soil borings (SB-11 through SB-14) were advanced to a maximum depth of 25 feet bgs within the tank pit excavation and to the east, west, and south of the tank pit excavation. Care was taken to advance one soil boring (SB-13) as close in proximity as possible to the product line chase left in place. A total of three soil samples (SB-11 through SB-13) were collected and analyzed for VOCs, PAHs, and lead. No constituents analyzed in soil were detected at levels above applicable R2 published levels.

The additional soil borings were completed as temporary monitoring wells and four groundwater samples (SW-11 through SW-14) were collected and analyzed for VOC, PAHs, and dissolved lead. No constituents analyzed in groundwater were detected at levels above applicable R2 published levels.

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<sup>2</sup> A confirmatory sample of the crushed concrete backfill (BF-1) was collected post placement and submitted for laboratory analyses of VOCs, PAHs, and total lead since the source of the concrete was unknown. Analytical results of the crushed concrete backfill sample were determined to be below applicable R2 published levels for all constituents analyzed.

## Technical Conclusion

IDEM can approve an unconditional residential closure of environmental conditions at the Site under the R2 since: (1) All USTs, associated concrete vaults, and accessible piping have been removed from the Site; (2) 35,500 gallons of petroleum-contaminated liquids and residual tank sludge were removed from the Site; (3) lead was detected in soil at a concentration above its RSPL in one location but the average lead concentration calculated using all soil sample results for lead was below its RSPL (and US EPA's 200 ppm residential soil lead RSL) indicating there is no threat to human health and the environment due to the detected lead concentration; and, (4) no constituents analyzed in groundwater or exterior soil gas were detected above applicable R2 published levels.

Based on the information on known contaminant levels submitted to or otherwise reviewed by IDEM, IDEM concludes that current Site conditions do not warrant a response action at this time and does not plan to take a response action at the Site at this time. If IDEM later discovers new information regarding historical contamination, then IDEM reserves the right to revoke this letter and pursue any responsible parties. Additionally, this determination does not apply to any contamination that is not described in this NFA Letter or any future releases at the Site. Furthermore, this letter does not constitute an assurance that the Site is safe or fit for any particular use. Please be advised that any work performed at the Site must be done in accordance with all applicable environmental laws.

IDEM is pleased to assist the Housing Authority of South Bend/South Bend Affordable Housing Corporation with this no further action determination. Should you have any questions or comments, please contact Ken Coad of the Indiana Brownfields Program at 317-233-8904 or by email at [kcoad@ifa.in.gov](mailto:kcoad@ifa.in.gov).

Sincerely,



Andrea Robertson Habeck  
Technical Staff Coordinator  
Indiana Brownfields Program

cc: Ashley Green, U.S. EPA Region 5  
Meredith Gramelspacher, Indiana Brownfields Program  
Ken Coad, Indiana Brownfields Program  
Shay Hartley, Petroleum Remediation Section  
Sean Hill, Heartland Environmental  
St. Joseph County Health Department