



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

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

August 28, 2024

VIA MAIL

UST OWNER AT THE TIME OF RELEASE

Mr. Darshan Dhaliwal
Bulk Petroleum Corp.
9653 N Granville Rd
Mequon, WI 53097

UST OWNER

Mr. Ravinder Singh
112 Skyview Drive
Greensburg, KY 42743

UST OPERATOR

Mr. Dhruvi Patel
Devi Krupa Inc
829 N Ewing St
Seymour, IN 47274

PROPERTY OWNER

Mr. Ravinder Singh
112 Skyview Drive
Greensburg, KY 42743

Re: **Groundwater and Vapor Intrusion Sampling Request**

Former Bulk Petroleum Store #2761
829 North Ewing Street
Seymour, IN 47274
Jackson County
Facility ID #532
Incident #200508525

To Whom It May Concern:

IDEM staff reviewed the file pertaining to a release of petroleum product for the Former Bulk Petroleum Store #2761 located at 829 North Ewing Street in Seymour, Indiana. The following document was reviewed:

- Quarterly Monitoring Report – Fourth Quarter 2022, prepared by Golars Environmental Engineering; dated January 20, 2023 (Virtual File Cabinet Document #83419365).



Visit on.IN.gov/survey or scan the QR code to provide feedback.

We appreciate your input!



As a result of the review, IDEM has determined that you must conduct a further site investigation (FSI) in order to fully delineate the nature and extent of contamination in accordance with applicable portions of 40 CFR Part 280¹ and IC 13-23-13-1.

Pursuant to 40 CFR 280.65, in order to determine the full extent and location of soils contaminated by the release and the presence and concentrations of dissolved product contamination in the groundwater, owners and operators must conduct investigation of the release, the release site, and the surrounding area possibly affected by the release if any of the following conditions exist:

1. There is evidence that groundwater wells have been affected by the release (e.g., as found during release confirmation or previous corrective action measures);
2. Free product is found to need recovery in compliance with 40 CFR 280.64;
3. There is evidence that contaminated soils may be in contact with groundwater (e.g., as found during conduct of the initial response measures or investigations required under 40 CFR 280.60 through 280.64); and
4. The implementing agency requests an investigation, based on the potential effects of contaminated soil or groundwater on nearby surface water and groundwater resources.

Work plan submittal and IDEM review is not required. However, IDEM advises that you receive project manager approval for an FSI work plan (entailing a one page summary of proposed work and a site map with proposed sampling locations) to assist with showing reasonableness and cost effectiveness for purposes of reimbursement from the Excess Liability Trust Fund (ELTF), if the site is or has been found to be eligible for such reimbursement. The IDEM project manager assigned to your site will be available to provide informal guidance via telephone, email, or on-site support during the step out process.

Listed below are the deficiencies which must be addressed in the FSI. You should refer to the Risk-based Closure Guide (R2, Waste #0046-R2) and the Petroleum Remediation Program Guide (PRPG, Waste-0082). These non-rule policy documents are available at www.in.gov/idem/tanks/2329.htm.

Specific Comments

1. Data from previous sampling events showed contamination above the Risk-Based Closure Guide (R2) Groundwater Published Levels (GWPLs) for both on – and off-site wells. Therefore, IDEM requests a groundwater sampling event of Monitoring Well (MW) 2, MW-6, MW-7R, MW-8R, MW-9R, MW-11, MW-14, MW-15, MW-16 and MW-18.

¹ IDEM has incorporated the majority of the federal underground storage tank regulations of 40 Code Fed. Reg. (CFR) Part 280 via 329 Ind. Admin. Code 9-1-1. All CFR citations refer to the regulation as incorporated.

2. Since a sample was not collected from Soil Gas-2 port (SG-2) in January 2022, IDEM requests an additional summer-worst case sampling to rule out vapor intrusion (VI).
3. IDEM requests a detailed outline of the on-site sewer system, as well as on-site sewer sample to rule out any VI occurring along the preferential pathway.

Additional IDEM expectations

IDEM requests that staff be notified of all investigative site work in a timely manner. Early staff involvement with the site investigation will assist in efforts to develop a complete conceptual site model within the year timeframe. Please inform the project manager via email or telephone (listed below) as field work dates for investigations are scheduled.

Conclusions

Current site conditions are unknown for this incident. Therefore, a sampling event to evaluate groundwater and VI is needed to determine what next steps are needed. Please provide the requested information in a report that can be reviewed by IDEM.

You must submit the requested report to IDEM within 30 days of sampling event. All FSI reports must be submitted in the FSI Report Format and include an FSI Cover Sheet for IDEM to complete their review. The FSI Report Format and Cover Sheet are available on the IDEM website forms page at <http://www.in.gov/idem/5157.htm>.

IDEM is currently requesting Petroleum Remediation Section (PRS) correspondence, reports, and related documents under 15 MB be submitted electronically to: LeakingUST@IDEM.in.gov. Electronic submittal directly to the PRS email inbox will streamline the documents distribution and help facilitate quicker document review times. Paper copies and CDs are no longer necessary as previously required in OLQ Document Submittal Guidelines.

Please label the email and attached documents as directed below:

- Email Subject Line: REPORT NAME (ie. 1Q 2024 QMR, ISC, FSI, etc.)_FID (insert number)_LUST (insert number)_DATE (yyyymmdd)
- Document/File Name: REPORT NAME (ie. 1Q 2024 QMR, ISC, FSI, etc.)_FID (insert number)_LUST (insert number)_DATE (yyyymmdd)

For more information regarding document and data submittal guidelines, sampling and analysis requirements or technical information, visit the LUST Home page at www.in.gov/idem/tanks/2333.htm or contact the site project manager.

Failure to submit this information within the specified timeframe may result in a referral to IDEM Enforcement. If you anticipate seeking reimbursement for your remediation costs, please contact the ELTF Section at (317) 234-0990.

If you have any questions, please contact me at (317) 232-6695 or toll free at (800) 451-6027. I can also be reached at: miwillis@idem.IN.gov.

Sincerely,

A handwritten signature in black ink that reads "Morgan Willis". The signature is written in a cursive, flowing style.

Morgan Willis
Environmental Project Manager
Petroleum Remediation Section
Petroleum Branch
Office of Land Quality

ecopy:IDEM File