



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

October 1, 2024

Mr. Jeff Long
Long Holdings Group, Inc.
f/k/a Cincinnati Drum Services Inc.
8373 Mary Lee Lane
West Chester, Ohio 45069

Re: No Further Action
Former Indy Drum
3619 Terrace Avenue
Indianapolis, Marion County
State Cleanup Site #0001032

Dear Mr. Long:

The Indiana Department of Environmental Management (IDEM) reviewed the file pertaining to a release of hazardous substances at the Former Indy Drum located at 3619 Terrace Avenue, Indianapolis, Indiana (Site) in accordance with IDEM's *Risk-based Closure Guide* (RCG) and *State Cleanup Program Guide* non-rule policy documents and *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW846) Third Edition, Update III. A copy of the public file for the Site will be maintained on IDEM's Virtual File Cabinet (VFC), under Site #0001032, which can be accessed online at <https://vfc.idem.in.gov/>.

IWM Consulting Group (IWM), on behalf of Long Holdings Group, Inc. (Long Holdings), has requested that a "No Further Action" status be granted for State Cleanup Site #0001032.

On January 11, 2021, Nick Gahl of Gahl Legal Group reported to IDEM that a Phase II Environmental Site Assessment conducted by Clean Wave Technologies at the Site revealed metals and volatile organic compounds (VOCs) in soil and groundwater. A subsequent vapor intrusion (VI) investigation conducted by IWM at the Site, reported on March 3, 2021 (VFC#83134697), revealed sub-slab vapor results for tetrachloroethene (PCE), trichloroethene (TCE), and 1,1-dichloroethane (1,1-DCA) exceeding IDEM Remediation Closure Guide (RCG) screening levels, while indoor air from the building on-Site remained in compliance. A Notice of Liability and Information Request to conduct cleanup of contamination was sent by IDEM to Long Holdings on May 17, 2021. Subsequent investigations were conducted on September 22, 2021 (VFC#83229002) and August 3, 2022 (VFC#83354319), delineating VOC contamination in the sub-surface. No off-Site properties were affected by the contamination from the Site. A Further Site Investigation Report with request for closure was submitted to IDEM on September



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

We appreciate your input!



5, 2023. A sub-slab depressurization system (SSDS) was installed by Vapor Intrusion Specialists LLC from June 27-July 24, 2022 to remedy vapors identified below the building slab. A Long-Term Operations, Maintenance, and Monitoring Plan (OM&M) for the SSDS was submitted to IDEM on October 21, 2023, and is approved by IDEM.

An environmental restrictive covenant (ERC), as approved by the Commissioner and/or his designee, was recorded with the Marion County Recorder's office on March 28, 2024, as Instrument Number A202400023662 by the property managing member, Longs Land Limited. Based on the technical reports reviewed by IDEM, current use of the Site, and the restrictions of the ERC, IDEM concludes that no further response actions are required provided that current and successive owners of the Site comply with the requirements and restrictions contained in the ERC. If additional information is subsequently obtained by IDEM indicating that the Site poses a risk to human health or the environment, including information about a land use inconsistent with the conditions of the ERC, IDEM reserves the right to modify or change the no further action determination as the situation may warrant.

Monitoring wells and/or piezometers are no longer necessary to monitor the groundwater quality or groundwater levels and must be permanently abandoned by a licensed Indiana water well driller in accordance with 312 Indiana Administrative Code (IAC) 13-10-2.

This NFA determination is an agency determination of status pursuant to Indiana Code (IC) 4-21.5-3-5. Should you have questions, or to notify IDEM of a change in Site conditions, please contact Tim Johnson at (317) 234-3931 or tjohnson@idem.in.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. L. Groves', with a stylized flourish at the end.

Ryan L. Groves, Chief
State Cleanup Section
Office of Land Quality

RLG:TRJ

cc: State Cleanup File #0001032
Mr. Kurt Byanski, IWM Consulting group
Mr. Greg Scarpone, IWM Consulting Group
Mr. Nick Gahl, Gahl Legal Group
Mr. Jason Ravenscroft, Marion County Health Department

For procedures to appeal this Agency decision, see the Office of Environmental Adjudication Guide to Administrative Appeals webpage at: <https://www.in.gov/oea/guide-to-appeals-process/>.