



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
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*Commissioner*

June 26, 2024

Ms. Kathi Davidson  
Deputy General Manager  
ICHINEN USA CORPORATION  
735 Saint Paul Street  
Indianapolis, Indiana 46203

\*Transmitted via Email\*

Re: Environmental Restrictive Covenant  
Toyoshima Special Steel Facility  
735 Saint Paul Street and 730 S. Keystone Avenue  
Indianapolis, Indiana 46203  
VRP # 6160703

Dear Ms. Davidson:

The Indiana Department of Environmental Management (IDEM) has reviewed the Environmental Restrictive Covenant (ERC) (Heartland, May 10, 2024) for the Toyoshima Special Steel Facility site located at 735 Saint Paul Street and 730 S. Keystone Avenue in Indianapolis, Indiana.

The reports were uploaded to the IDEM Virtual File Cabinet (VFC) as document No. 83637401. Further site history can be found in the VFC located on the IDEM website [vfc.idem.in.gov](http://vfc.idem.in.gov). This technical letter contains a brief background summary including comments generated during our review of the above-mentioned report.

## Background

The Toyoshima facility is located on the east side of Indianapolis in an industrial/residential neighborhood. The facility is bound to the north by residential properties and to the east by the former Hoosier Penn Oil Company (State Cleanup Site #2006-12-133), Keystone Avenue and an undeveloped property. A railroad, with residential properties beyond, borders the facility to the south and National Chimney and Dynamic Recovery Services to the west.

The western portion of the site was developed in 1922 as Service Spring Company, a manufacturer of automobile leaf springs. The facility operated as Service Spring Company from 1922 through 1985, when it was purchased by Toyoshima. In early 1989, the facility began manufacturing forklift components, specifically steel forklift arms, and phased out the manufacturing of automobile leaf springs. The facility was expanded in 1989, with the construction of the western portion of the main manufacturing building. Manufacturing operations conducted at the facility have included treatment, tapering, and trimming of steel, steel blast cleaning and shaping, machine and steel washing and paint booth operations. Specific operations at the facility have also included the use of heat treatment furnaces, quenching tanks, machine pits and a paint booth area. The facility historically utilized underground storage tanks (USTs) to store oils and other hazardous and non-hazardous machine-use chemicals. Toyoshima Special Steel currently



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operates the facility, with most manufacturing operations located within the western portion of the main building. The eastern portion of the main building is primarily used for warehousing.

The results of a Phase II Environmental Site Assessment (ESA) showed that concentrations of polycyclic aromatic hydrocarbons (PAHs) exceeding the IDEM Remediation Closure Guide (RCG) Migration to Groundwater Screening Levels (MTGSLs) were present in soils adjacent to the former basement storage tanks and former quench oil tank. In addition to the soil impacts, volatile organic compound (VOC) and PAH impacts exceeding the IDEM RCG Residential Groundwater/Tap Screening Levels (GW/Tap SLs) were detected in groundwater collected from piezometers installed near the location of the former quench oil tank. Furthermore, free product petroleum based light non-aqueous phase liquids (LNAPLs) were identified in both soils and groundwater near the former quench oil tank. Field observations indicated that the free product LNAPLs appeared to be either quenching oil or waste oil and did not appear to be a gasoline or diesel fuel product.

IDEM approved Heartland's Remediation Work Plan (RWP) on June 11, 2019, in which a high vacuum Multi-Phase Extraction (MPE), to extract LNAPL, groundwater and soil vapors from the subsurface, was proposed. In addition to the MPE System, a series of enhanced fluid recovery (EFR) vacuum extraction events were to be initiated. The extraction events would utilize the existing monitoring wells near the northern portion of the site, where suspected quench oil free product had been identified. The corrective action objectives at the site were as follows:

- Recover and remove free product,
- remediate chemical impacts to water and soil onsite using a technology that is protective of human health and the environment,
- prevent off-site migration of COCs and
- provide a contingency plan if the selected technology proves ineffective.

The MPE system operations and maintenance (O&M) activities are currently ongoing and have been conducted since system startup on May 18, 2020. Nine EFR events have been conducted since initiating implementation of the RWP and occurred on June 19, 2020, September 4, 2020, March 26, 2021, August 27, 2021, January 28, 2022, February 25, 2022, March 25, 2022, May 6, 2022, and May 27, 2022.

Groundwater Monitoring Events were completed from March 22 through March 23 and June 20 to June 21, 2022. The last monitoring event serves as the seventh quarterly monitoring event to be completed as part of an initiated long term consecutive groundwater monitoring program.

Based on the results of the June 2022 gauging, free product LNAPL was encountered in 16 of the 32 monitoring wells (MW-1, MW-2, MW-5 through MW-11, MW-13, MW-15, MW-21, MW-24, MW-25, MW-30 and MW-32), with thicknesses observed ranging from trace amounts up to 10.17 feet at monitoring well MW-21. Additional EFR events are not being scheduled at this time. Heartland plans to monitor the site for LNAPL recharge and to determine whether additional EFR events are necessary.

To date, the MPE system, coupled with the periodic EFR events, has recovered approximately 9,305-gallons of free product. It is anticipated that free product recovery rates will remain consistent for the foreseeable future while operating the MPE system.

The Consultant anticipates that an Environmental Restrictive Covenant (ERC) with implemented land use restrictions, including restricting residential reuse of the site and restricting

potable water well installation and utilization, will be required to mitigate potential future exposure risks associated with impacted subsurface media at the site.

The most recent groundwater sampling event was completed in March 2024. This is the third sampling event after the MPE system was turned off. LNAPL was measured and the highest thickness was 0.62 feet at monitoring well MW-21. LNAPL was encountered in 17 of 32 monitoring wells. Monitoring wells MW-5, MW-8 through MW-11, MW-19, MW-21, MW-23, MW-24, MW-25, MW-31, and MW-32 were not sampled based on the presence of LNAPL.

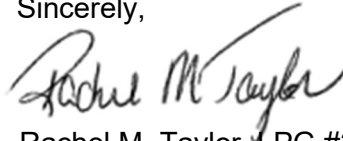
Comments generated during the review of the ERC are summarized below.

### Comments

1. IDEM requires a copy of the corrected Deed to perform a comprehensive review for ERC.
2. No Exhibits have been attached to this ERC. IDEM requires these exhibits to complete a comprehensive review.
3. All maps must be 8.5 X 11, Black & White, Non-aerial view with parcel boundaries, parcel numbers, cross streets and/or roads clearly depicted. All other items are to be removed and all call out boxes are to be removed. These maps will be recorded in black and white and must have clearly identifiable markings. Map depictions should be clear and uncluttered.
4. The ERC for 49-10-07- 198-001.000-101 (730 South Keystone Avenue) says the acreage is 3.68, when it should be 1.99 according to the county's website.
5. Proposed restriction (c) regarding the need for a vapor mitigation system or demonstration of an incomplete VI exposure pathway for any new residential or commercial structure implies the potential for future residential development. Given the continuing presence of LNAPL and industrial activities on-site, future residential development is problematic. IDEM recommends the following change to proposed restriction (c):  
  
"Shall not construct or allow occupancy of a workspace or commercial structure on the Real Estate unless a vapor intrusion mitigation system is installed, operated, and maintained within the structure. IDEM may waive this restriction in writing if the Owner has provided data and analysis demonstrating to IDEM's satisfaction that there is no unacceptable risk to human health via the vapor intrusion exposure pathway."
6. Proposed restriction (d) should state:  
  
"Shall prohibit any activity at the Real Estate that may interfere with the groundwater monitoring or well network as depicted on Exhibit \_\_\_\_ via \_\_\_\_."
7. IDEM recommends adding the following restriction:  
  
"Shall not use or allow the use of the Real Estate for residential purposes, including, but not limited to, daily childcare facilities or educational facilities for children (e.g., daycare centers or K-12 schools)."

If you have any questions, please contact me at (317) 234-3793, (800) 451-6027, or at [RMTaylor@idem.in.gov](mailto:RMTaylor@idem.in.gov).

Sincerely,



Rachel M. Taylor, LPG #2645  
Senior Environmental Manager  
Voluntary Remediation Program  
Office of Land Quality

EC: Nivas Vijay, Heartland Environmental Assoc. Inc., 3410 Mishawaka Avenue,  
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*It is the goal of IDEM to enable remediation sites to move forward in a timely manner. If an impasse has been reached over technical issues, a Technical Review Panel of non OLQ scientists is available to review and offer a non-binding opinion to help resolve technical disagreements with the VRP and State Cleanup Program project managers. The goal is to facilitate progress at your site. This review process is available immediately. If you would like to request a review by the Panel, please contact Kevin Davis, Remediation Services Branch Chief for the Office of Land Quality, at 317-232-4535 or [kdavis2@idem.in.gov](mailto:kdavis2@idem.in.gov).*

*Any decision produced by the Technical Review Panel is not an agency action as defined in IC § 4-21.5-1-4 or an order as defined in IC §4-21.5-1-9. This decision is not subject to administrative review because it is not a determination of any legal rights, duties, privileges, immunities, or other legal interests, and because it is issued pursuant to an informal procedure for dispute resolution as allowed by IC 4-21.5-3-34 (a).*