



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

June 17, 2024

VIA ELECTRONIC MAIL

Mr. Randall Blank
Owner
TFS Investments, Inc.
3861 Bayview Road
Angola, IN 46703
blank_r@msn.com

Re: **Further Site Investigation Request**
Paradise Express
2040 N 200 West
Angola, IN 46703
Steuben County
Facility ID #6296
Incident #202402507

Dear Mr. Blank:

IDEM staff reviewed the file pertaining to a release of petroleum product for the Paradise Express located at 2040 N 200 West in Angola, Indiana. The following document was reviewed:

- *Initial Site Characterization Report* prepared by Creek Run, LLC dated May 16, 2024 (Virtual Cabinet File #83641860)

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

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.



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

We appreciate your input!



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.

Releases requiring an FSI to complete site characterization will be given a deadline of 365 days from the date the release was confirmed to determine the full nature and extent of soil and groundwater contamination and submit documentation to IDEM. If delineation requires more than one mobilization and sampling event, the owner or operator should continue with delineation until the delineation process is completed and then submit a comprehensive FSI Report within the 365-day deadline set by IDEM. Interim report and 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

Soil- Three (3) borings were advanced at the site to check for volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs). All soil samples were below R2 published levels (PLs) at the site. Soil has been adequately delineated throughout the site.

Groundwater- The soil borings were then converted to groundwater monitoring wells to sample groundwater. Monitoring wells MW-1 to MW-3 were then gauged and sampled for contamination using R2 published guidelines. Groundwater contaminants were found in all of the wells, which included benzene and naphthalene. The additional wells proposed are acceptable and will help delineate the groundwater.

Vapor Intrusion- Soil gas samples should be collected on site to see if a remedy is needed.

Additional IDEM expectations

In order to facilitate complete site characterization within a year, 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

The additional monitoring wells proposed have been approved. The additional four (4) monitoring wells will help delineate the extents of the plume on site. A quarterly monitoring report will also be granted to identify further contamination of free product at the site. Additional soil samples are not necessary due to soil already being below R2 published levels. A V.I investigation for soil gas vapors should be conducted to determine if a remedy is needed.

You must submit the FSI report to IDEM on or before March 18, 2025. 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) 232-8006 or toll free at (800) 451-6027. I can also be reached at: AFix@idem.IN.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Fix', with a stylized flourish at the end.

Aaron Fix
Environmental Project Manager
Petroleum Remediation Section
Petroleum Branch
Office of Land Quality

ecopy:IDEM File

Lisa Hendershot, Creek Run, LLC, lhendershot@creekrun.com

Ellis, Roberta

From: Randall Blank <blank_r@msn.com>
Sent: Wednesday, June 26, 2024 11:33 AM
To: Ellis, Roberta
Subject: Re: IDEM PRS CORRESPONDENCE FID 6296 FSI REQ

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Ms Ellis

Yes I received your email and I have authorized Creek Run to comply on my behalf.

Thank you

Randall Blank

From: Ellis, Roberta <REllis@idem.IN.gov>
Sent: Wednesday, June 26, 2024 9:45 AM
To: Randall Blank <blank_r@msn.com>
Subject: FW: IDEM PRS CORRESPONDENCE FID 6296 FSI REQ

Hello,

Could you please respond to the email that was sent to you on 6/18/2024? I need confirmation that you received this letter.

Thank you.



Bobbi Ellis

Secretary | Petroleum Remediation Section
Petroleum Branch | Office of Land Quality
Indiana Department of Environmental Management

(317) 232-8900 | rellis@idem.IN.gov



From: Ellis, Roberta
Sent: Tuesday, June 18, 2024 7:04 AM
To: blank_r@msn.com
Cc: Fix, Aaron R <AFix@idem.IN.gov>; lhendershot@creekrun.com
Subject: IDEM PRS CORRESPONDENCE FID 6296 FSI REQ

RETURN E-MAIL RECEIPT REQUESTED

The IDEM Petroleum Remediation Branch is now sending formal communication (signed letters) via electronic mail (e-mail). IDEM has provided electronic copies of our letters to consultants for several years and are now also providing our correspondence via e-mail to the Registered UST Owner/Operator or Responsible Party. The UST Branch will only utilize the US Postal Service if e-mail is not available. We believe that this approach is not only more economically responsible, but will also allow us to reach our customers in a more timely manner.

In that regard, IDEM is requesting a return receipt via email indicating that the correspondence has been received for our records. Please review and respond appropriately to the attached IDEM correspondence per IDEM document submittal guidelines. We hope to continue working with you to improve our customer service. Please notify IDEM if you have a preferred email address for this correspondence or regarding any e-mail address changes. If you have any questions please feel free to contact me at 317/232-8900 or Shay Hartley at 317/234-5160.



Bobbi Ellis

Secretary | Petroleum Remediation Section
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