

Kayden, Nora

From: ERS <ers@corner-enviro.com>
Sent: Thursday, April 18, 2024 9:13 AM
To: Kayden, Nora
Cc: Kevin Mallin
Subject: RE: State Cleanup #0000882 - Former Stalcorp Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

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Thanks Nora!

Bruce Bultman, LPG
Principal Geologist
Cornerstone Environmental Health and Safety, Inc.
Cell: (317) 797-4064

From: Kayden, Nora <NKayden@idem.IN.gov>
Sent: Thursday, April 18, 2024 9:07 AM
To: ERS <ers@corner-enviro.com>
Cc: Kevin Mallin <kmallin@corner-enviro.com>
Subject: RE: State Cleanup #0000882 - Former Stalcorp Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

Ok sounds good. Let me know if I can be of any more assistance.



Indiana Department of
Environmental Management

Nora Kayden


Environmental Manager

•(317) 232-2667 • nkayden@idem.IN.gov

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From: ERS <ers@corner-enviro.com>
Sent: Wednesday, April 17, 2024 2:49 PM
To: Kayden, Nora <NKayden@idem.IN.gov>
Cc: Kevin Mallin <kmallin@corner-enviro.com>
Subject: RE: State Cleanup #0000882 - Former Stalcorp Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

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Hello Nora,

I want to let you know that I need to reschedule the VIA sampling at 122 S Front Street in Thorntown. The sampling was scheduled for tomorrow and Friday. I called Ms. Coffman and let her know. She was fine with rescheduling. I will let you know once we have a new date scheduled. Thanks, Bruce

Bruce Bultman, LPG
Principal Geologist
Cornerstone Environmental Health and Safety, Inc.
Cell: (317) 797-4064

From: Kayden, Nora <NKayden@idem.IN.gov>
Sent: Friday, April 12, 2024 2:54 PM
To: ERS <ers@corner-enviro.com>
Cc: Kevin Mallin <kmallin@corner-enviro.com>
Subject: RE: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

I left you a message today Bruce but I finally heard back from Ms. Coffman. She is willing to schedule with you for the vapor sampling when you are ready for 122 Front Street.




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From: ERS <ers@corner-enviro.com>
Sent: Friday, June 23, 2023 4:47 PM
To: Kayden, Nora <NKayden@idem.IN.gov>
Cc: Kevin Mallin <kmallin@corner-enviro.com>; ERS <ers@corner-enviro.com>
Subject: RE: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

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Hello Nora,

Thank you for taking the time on Monday to discuss your comments in the preceding email. In follow-up to our conversation, I tried to contact the owners of 122 South Front Street, Ms. Cecilia Essex and Ms. Linda Coffman on Tuesday. They have not returned my call. Attached is the Boone County Property Report Card for the property. It lists their mailing address as 122 S Front Street, Thorntown, Indiana, 46071, but the property is vacant. Also attached is the Access Agreement that Ms. Essex signed. As indicated in prior correspondence and during our conversation, CEHS was subsequently denied access. The telephone number for Ms. Essex is (765) 482-1472, and the telephone number for Ms. Coffman is (765) 436-7546. Please do not include Ms. Essex's or Ms. Coffman's contact information on the VFC. The help is much appreciated!

Regarding Comment 2, you indicated IDEM Chemistry indicated the last 2 sentences in Section 1.6 (below) of the QAPP are too specific.

Section 1.6 Intended Data Usage & Data Quality Objectives

Data Quality Objectives (DQO) are qualitative and quantitative statements specifying the data required and are based on the data's end uses. As such, different data uses may require different levels of quality. Table 2 lists elements that IDEM R2 guidance has determined are essential to support three levels of QA/QC. Level II elements [which IDEM calls minimum data documentation recommendations (MDDRs)] are appropriate to support investigations where data validation is not necessary. When data validation is required, IDEM Level III or Level IV QA/QC elements will be provided. Level III provides an intermediate level of data quality and is used for site characterization. Level IV provides the highest level of data quality and is used for risk assessment, evaluation of remedial alternatives, and verification that cleanup standards have been met.

As suggested, CEHS is agreeable to the sentences being removed and replaced with "IDEM may request additional validation on a project-specific basis."

Lastly, per our conversation, groundwater sampling this quarter will be reduced to the monitoring wells with exceedances during the past 4 quarters. CEHS will conduct annual sampling of all monitoring wells.

CEHS will provide a formal response to IDEM's letter once it is received. Please let me know if you have any additional questions, comments, or concerns. Thank you, and have a good weekend. Bruce

Bruce Bultman, LPG
Principal Geologist
Cornerstone Environmental Health and Safety, Inc.
Cell: (317) 797-4064

From: Kayden, Nora <NKayden@idem.IN.gov>
Sent: Friday, June 16, 2023 3:16 PM
To: ERS <ers@corner-enviro.com>
Cc: Kevin Mallin <kmallin@corner-enviro.com>
Subject: RE: State Cleanup #0000882 - Former Stalcorp Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

Hi Kevin, absolutely! It's not a real major issue and I think talking it through will be more effective anyway.

If you would like to call Monday anytime, I will be available.

Have a nice weekend



Indiana Department of
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Nora Kayden

Environmental Manager

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From: ERS <ers@corner-enviro.com>

Sent: Friday, June 16, 2023 9:54 AM

To: Kayden, Nora <NKayden@idem.IN.gov>

Cc: Kevin Mallin <kmallin@corner-enviro.com>

Subject: RE: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

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Hello Nora,

Thank you for the comments and assistance. Do you have time on Monday afternoon to discuss the comments, specifically comment #2? If Monday afternoon doesn't work, please give me a few times you are available. I would like to get any concerns resolved so we can forward the implementation of the RWP. Thank you, Bruce

Bruce Bultman, LPG
Principal Geologist
Cornerstone Environmental Health and Safety, Inc.
Cell: (317) 797-4064

From: Kayden, Nora <NKayden@idem.IN.gov>

Sent: Tuesday, June 13, 2023 4:17 PM

To: Kevin Mallin <kmallin@corner-enviro.com>

Cc: ERS <ers@corner-enviro.com>

Subject: RE: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

Good Afternoon Kevin,

I would like to provide a partial response for the sake of efficiency to the revised Remediation Work Plan (Work Plan) submitted by Cornerstone Environmental Health & Safety (CEHS) March 6, 2023. I have addressed comments #1,2, and 3 below. I will prepare a more formal letter with the comments below and remaining comments (#4, 5, and 6) as soon as possible. However, I did not want to hold up your sampling activities!

First to answer your question below in this email chain; you may go ahead and send me your list of the proposed reduced well network. The Work Plan indicates the monitoring well network (24 MWs) shall be sampled quarterly for a minimum of eight quarters after treatment. Further, a reduced monitoring well sample program is proposed where monitoring wells with four consecutive quarters of trichloroethylene (TCE) levels below the R2 Groundwater Published Levels (GWPL) will be collected annually. This approach is acceptable. When appropriate, CEHS should identify monitoring wells to be sampled quarterly and annually. Please take care in residential areas and consider potential relevant future extents (R2 Section 2.3.5.3).

1. CEHS has added a sentence to the revised Work Plan regarding the potential need for additional post remedy groundwater sampling if plume stability is used as a line of evidence to support closure. This response to IDEM Comment 1 is acceptable.
2. The response to IDEM Comment 2 is not acceptable. The revision made to the Work Plan includes language not consistent with Section 2.2.9 Data Reporting requirements of the R2. Level II Quality Assurance/ Quality Control (QA/QC) elements are the minimum data documentation recommendations (MDDRs) for this Site as part of the State Cleanup Program (SCP). Additional levels of MDDRs are only required upon IDEM's request for Level III or Level IV QA/QC elements which may occur on a project-specific basis. If you would like some further clarification on this, I am happy to speak with you on the phone about it.
3. CEHS notes access denial has continued to interfere with investigation at the off-Site property located at 122 South Front Street. The revised Work Plan has included a contingency plan to sample exterior soil gas (SGe) along the eastern boundary of the Site to evaluate for potential vapor intrusion VI at the 122 South Front Street property. This response to IDEM Comment 3 is acceptable. However, CEHS should continue to attempt to gain access since it seemed as though the COVID epidemic got in the way beforehand. IDEM may request additional information following remedy implementation to support the off-Site VI exposure risk as being negligible. Let me know if you would like assistance with this issue and we can attempt to contact the owner again.

Thank you and I look forward to working with you.



Indiana Department of
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Nora Kayden

Environmental Manager

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From: Kevin Mallin <kmallin@corner-enviro.com>

Sent: Wednesday, June 7, 2023 10:34 AM

To: Kayden, Nora <NKayden@idem.IN.gov>

Cc: ERS <ers@corner-enviro.com>

Subject: RE: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

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Nora,

Thank you for your response. I will get with our Team and determine whether to have a call with you! We certainly appreciate the opportunity to talk with you but we would like to wait on your response before setting up a call.

Thank you,

Kevin Mallin, CHMM, CPG, LPG

Senior Project Manager
Cornerstone Environmental, Health and Safety, Inc.

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 kmallin@corner-enviro.com
 www.corner-enviro.com
 880 Lennox Court, Zionsville, IN 46077



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From: Kayden, Nora <NKayden@idem.IN.gov>

Sent: Wednesday, June 7, 2023 9:45 AM

To: Kevin Mallin <kmallin@corner-enviro.com>

Cc: ERS <ers@corner-enviro.com>

Subject: RE: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

Good morning Kevin,

Thank you for your patience. I am getting caught up on things so apologies for the delay. I should have a comment letter out to you by the end of next week and I can try to put together an informal update by the end of this week. Let me know if you have any questions or would like to have a call.

I look forward to working with you.

Indiana Department of
Environmental Management

Nora Kayden

Environmental Manager

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From: GROVES, RYAN <RGROVES@idem.IN.gov>

Sent: Friday, June 2, 2023 10:41 AM

To: Kevin Mallin <kmallin@corner-enviro.com>

Cc: ERS <ers@corner-enviro.com>; Kayden, Nora <NKayden@idem.IN.gov>

Subject: RE: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

Hi Kevin,

Bobbie left IDEM for the EPA in Region 7. This site is now being managed by Nora Kayden. She has taken all of the Thorntown sites.....

Please contact Nora for status updates....

Ryan

Ryan L. Groves

Section Chief | State Cleanup Program

Office of Land Quality

Indiana Department of Environmental Management

(317) 232-3413 | rgroves@idem.IN.gov

 |  |  | 



From: Kevin Mallin <kmallin@corner-enviro.com>

Sent: Thursday, June 01, 2023 9:23 AM

To: GROVES, RYAN <RGROVES@idem.IN.gov>

Cc: ERS <ers@corner-enviro.com>

Subject: FW: State Cleanup #0000882 - Former Stalcorp Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

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Ryan,





Is Bobbie still at IDEM? If not, who is the project manager for the Former Stalcorp Cold Forming project in Thorntown, IN (State Cleanup #0000882)?

Otherwise, can you answer my questions below?

Thank you,

Kevin Mallin, CHMM, CPG, LPG

Senior Project Manager
Cornerstone Environmental, Health and Safety, Inc.

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From: Kevin Mallin

Sent: Wednesday, May 31, 2023 2:49 PM

To: Pennington, Bobbie <BPenning@idem.IN.gov>

Cc: ERS <ers@corner-enviro.com>

Subject: RE: State Cleanup #0000882 - Former Stalcorp Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

Bobbie,





I'm just checking in to see the status of your (and technical review) of the Revised RWP. Can you give me an update?

Secondly, we're getting ready to continue the quarterly groundwater monitoring in June. However, we are wanting to reduce the number of monitoring wells to sample and are requesting your approval for those wells that have been consistently non-detect for any of the Chemicals of Concern in groundwater. If you can give us preliminary approval, we will send you a list of wells to be sampled and a separate list of the wells to be reduced from the full quarterly sampling.

Thank you,

Kevin Mallin, CHMM, CPG, LPG

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Cornerstone Environmental, Health and Safety, Inc.

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From: Pennington, Bobbie <BPenning@idem.IN.gov>
Sent: Wednesday, April 26, 2023 9:15 AM
To: Kevin Mallin <kmallin@corner-enviro.com>
Subject: RE: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

Hello Kevin,

I have reviewed the RWP but it is still under technical review. Once the technical review is complete, I can send you a response. I'm not anticipating any issues but I cannot definitively say until the technical review is complete.

Thanks,

Bobbie Pennington
Project Manager | State Cleanup Section


From: Kevin Mallin <kmallin@corner-enviro.com>
Sent: Wednesday, April 26, 2023 7:55 AM
To: GROVES, RYAN <RGROVES@idem.IN.gov>
Cc: Pennington, Bobbie <BPenning@idem.IN.gov>
Subject: RE: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

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Thanks Ryan! I will reach out to her this morning.

Thank you,

Kevin Mallin, CHMM, CPG, LPG
Senior Project Manager
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 (317) 489-3249



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From: GROVES, RYAN <RGROVES@idem.IN.gov>
Sent: Tuesday, April 25, 2023 4:21 PM
To: Kevin Mallin <kmallin@corner-enviro.com>
Cc: Pennington, Bobbie <BPenning@idem.IN.gov>
Subject: RE: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

Hi Kevin,

That project was recently reassigned to one of our new PMs, Bobbie Pennington. Please check in with her on review status and for an update. I've copied her so you have her email contact. Her direct phone # is 317-234-2366.

She may still be coming up to speed on her projects, but I'm sure she'll be glad to talk with you and share her status.

Ryan

Ryan L. Groves
Section Chief | State Cleanup Program
Office of Land Quality
Indiana Department of Environmental Management

(317) 232-3413 | rgroves@idem.IN.gov



From: Kevin Mallin <kmallin@corner-enviro.com>
Sent: Tuesday, April 25, 2023 2:24 PM
To: GROVES, RYAN <RGROVES@idem.IN.gov>
Subject: State Cleanup #0000882 - Former Stalcop Cold forming, Inc. - Remediation Work Plan Review/Approval Progress

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Ryan,

Have you had a chance to review the revised Remediation Work Plan (RWP) we sent you recently? Any information regarding the status of the review and/or approval of the RWP would be appreciated.

Thank you,

Kevin Mallin, CHMM, CPG, LPG

Senior Project Manager
Cornerstone Environmental, Health and Safety, Inc.

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