

## Jordan, Sherry

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**From:** Griggs, Bryant <Bryant.Griggs@arcadis.com>  
**Sent:** Tuesday, June 25, 2024 3:16 PM  
**To:** LeakingUST; Willis, Morgan I  
**Cc:** isauroramirez@ups.com; cvise@ups.com; Johnston, Matthew; Vasas, Stephen; Susin, Erin; Griggs, Bryant  
**Subject:** ISC Waiver Request\_FID 1697\_INC 202404515\_20240625  
**Attachments:** ISC Request FID 1697 (002).pdf

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Dear Morgan Willis,

Arcadis U.S., Inc. (Arcadis) on behalf of United Parcel Service (UPS), is requesting a Waiver for the Initial Site Characterization request letter dated April 26, 2024 (Attached) for Incident. 20240625 at facility id 1697, based on the following lines of Evidence:

- Diesel and gasoline UST systems were permanently closed by removal.
- Confirmation soil samples had limited detections of VOCs, PAHs, and Total Lead above laboratory limits, however no constituent detections exceeded their respective, most conservative IDEM RCG 2 2024 screening levels.
- Tank pit water samples collected- One from dewatering during UST removal activities and one following removal activities, both had limited detections of VOCs, PAHs and Total Lead. Only Benzene and Naphthalene was detected above the respective IDEM RCG 2 2024 screening levels but were both below 100 micrograms per liter.
- Soil boring was completed to collect a borehole groundwater sample. No VOCs, PAHs, and Lead Scavengers detections were above laboratory limits. Only Total lead was detected above IDEM 2024 RCG Screening levels, however, due to the highly turbid nature of the sample it was lab filtered and analyzed for Dissolved Lead and was below laboratory limit.
- Additionally, the Site property already has Environmental Restrictive Covenant (ERC) related to Arsenic and Lead from a historical UST closure on the Site.

The above bulleted items are summarized in more detail in an ISC Alternative Letter Report, currently in process to be submitted to IDEM. The Letter report includes the UST Closure Report as an attachment. Based on the findings discussed in the ISC Alternative Letter Report and subsequent UST Systems Closure Report, the pre-existing recorded ERC restrictions on property use, activities associated with these UST closures are unlikely to pose any ongoing risk to human health and/or the environment.

The Arcadis Licensed Professional Geologist assigned to this Incident is Matthew D. Johnston, LPG-IN #2259. The UST owner contact for UPS is Isauro Ramirez.

Please let us know if you have any questions.

Thank you,  
Bryant

**Bryant Griggs** | bryant.griggs@arcadis.com  
Project Scientist-Geology

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

April 26, 2024

## VIA ELECTRONIC MAIL

Mr. Isauro Ramirez  
United Parcel Service, Inc.  
700 West 16<sup>th</sup> Street  
Indianapolis, IN 46202  
[isauroramirez@ups.com](mailto:isauroramirez@ups.com)

Re: **Initial Site Characterization Request**  
UPS Terre Haute  
5596 East Margaret Drive  
Terre Haute, IN, 47803  
Vigo County  
Facility ID #1697  
Incident #202404515

Dear Mr. Ramirez:

A release from an Underground Storage Tank (UST) at UPS Terre Haute located at 5596 East Margaret Drive in Terre Haute, Indiana was reported by Stephen Vasas, Arcadis on April 25, 2024. Your compliance must proceed in accordance with IC 13-23-13-1 and 40 CFR 280 Subpart F,<sup>1</sup>.

### Initial Site Characterization

The purpose of the ISC is to gather information regarding the release and surrounding area, including, but not limited to, evaluation of potential pathways for migration, and evaluation of receptors. Pursuant to IC 13-23-13-1, when necessary and feasible as determined by a qualified environmental professional (QEP) (as defined in IC 13-11-2-177.7), an ISC must include:

1. Site-specific geologic information obtained from a minimum of three (3) continuously sampled soil borings;
2. Hydrogeologic information, including depth to ground water and groundwater flow directions and gradients, obtained from a minimum of three (3) monitoring wells screened across the water table; and

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<sup>1</sup> 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.



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3. Other pertinent information as outlined in 40 CFR 280.63 and be consistent with 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](http://www.in.gov/idem/tanks/2329.htm).

The borings and wells should be installed in areas most likely to be contaminated.

Per IC 13-23-13-1, a QEP, on behalf of the owner or operator of an UST from which there has been a release of petroleum, may submit for approval by the commissioner an alternative procedure for ISC and request a waiver of the requirement. Proof of QEP credentials must be provided. For clarity and to ensure UST Owner engagement, the QEP should copy the UST Owner on any correspondence. The commissioner may approve the request for a waiver and alternative procedure only if the alternative procedure provides substantially equal protection for human health and the environment. Your QEP must submit the waiver request for an alternative procedure as soon as sufficient environmental data are obtained to make the determination that an alternative procedure meets the requirements of IC 13-23-13-1.

Pursuant to 40 CFR 280.63 you must assemble information about the site and nature of the release, including information gathered while confirming the release or completing the initial abatement measures in 40 CFR 280.60, 280.61 and 280.62. This information must include, but is not necessarily limited to the following:

1. Data on the nature and estimated quantity of the release;
2. Data from available sources and/or site investigations concerning the following factors: Surrounding populations, water quality, use and approximate locations of wells potentially affected by the release, subsurface soil conditions, locations of subsurface sewers, climatological conditions, land use;
3. Results of the site check required under 40 CFR 280.62(a)(5) (or 40 CFR 280.52 or 280.72, whichever is applicable); and
4. Results of free product investigations required under 40 CFR 280.62(a)(6), to be used by Owners and Operators to determine whether free product must be recovered under 40 CFR 280.64.

#### **40 CFR 280.65 Investigations for soil and groundwater cleanup (Further Site Investigations)**

If an ISC does not fully define the nature and extent of the contaminant plume, additional investigation shall be performed in accordance with 40 CFR 280.65 or when necessary and feasible as determined by a QEP. If this is the case for this particular release, a Further Site Investigation (FSI) Report will be required and the ISC Report must contain a work plan for the FSI. The work plan should detail additional activities that are proposed and should provide a schedule of the FSI activities.

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 release investigations 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 365 days from the date the release was discovered 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 the purposes of the Excess Liability Trust Fund (ELTF). 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.

### **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**

Within 60 days of the release confirmation an Initial Site Characterization (ISC) Report must be submitted to IDEM. **The due date for the ISC Report is June 24, 2024. No extensions will be granted.**

All ISC Reports must be submitted in the ISC Report Format and include an ISC Checklist and ISC Cover Sheet for IDEM to complete their review. IDEM's goal is to review all ISC reports within sixty days (60) days of receipt and return the evaluated checklist. All items marked as inadequate on the returned and signed ISC Checklist must be addressed in the timeframe required in IDEM correspondence.

IDEM requests Petroleum Remediation Section (PRS) correspondence, reports, and related documents under 15 MB be submitted electronically to: [LeakingUST@IDEM.in.gov](mailto:LeakingUST@IDEM.in.gov). 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 2023 QMR, ISC, FSI, etc.)\_FID (insert number)\_LUST (insert number)\_DATE (yyyymmdd)
- Document/File Name: REPORT NAME (ie. 1Q 2023 QMR, ISC, FSI, etc.)\_FID (insert number)\_LUST (insert number)\_DATE (yyyymmdd)

For more information regarding, sampling and analysis requirements or technical information, visit the LUST Home page at [www.in.gov/idem/tanks/2333.htm](http://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 have any questions, please contact Morgan Willis at (317) 232-6695 or toll free from within Indiana at (800) 451-6027. She can also be reached at: [miwillis@idem.IN.gov](mailto:miwillis@idem.IN.gov).

Sincerely,



Sherry Jordan  
Release Coordinator  
Petroleum Remediation Section  
Petroleum Branch  
Office of Land Quality

Ecopy: IDEM File  
Vigo County Health Department  
Stephen Vasas, Arcadis  
Erin Susin, Arcadis  
Bryant Griggs, Arcadis  
C. Vise, UPS ([cvise@ups.com](mailto:cvise@ups.com))  
M. Sullivan, UPS ([mwsullivan@ups.com](mailto:mwsullivan@ups.com))  
R. Rezvani, UPS ([rezvani@ups.com](mailto:rezvani@ups.com))  
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