



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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June 26, 2024

Jeff Sussman
The Goodyear Tire & Rubber Company
200 Innovation Way, D/108i
Akron, OH 44316

Transmitted via Email

Arlyn Eaglebarger
ContiTech USA, Inc.
207 South West Street
Auburn, IN 46706

Belinda Rubi
Cooper Standard Automotive, Inc.
40300 Traditions Drive
Northville, MI 48168

Re: Voluntary Remediation Investigation Plan
ContiTech
207 South West Street
Auburn, IN, 46706
VRP # 6231001

Dear Mr. Sussman, Ms. Eaglebarger, and Ms. Rubi:

The Indiana Department of Environmental Management (IDEM) has reviewed the Voluntary Remediation Investigation Plan (VRIP) (Haley & Aldrich, April 2024) for the ContiTech site located at 207 South West Street in Auburn, Indiana.

The report was uploaded to the IDEM Virtual File Cabinet (VFC) as document # 83632100. Further site history can be found in the VFC located on the IDEM website 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 ContiTech property consists of 18.69 acres across 16 parcels with 2 buildings, paved parking lots, and smaller landscaped areas located in DeKalb County. The property is used for manufacturing rubber products for the automotive industry and contains a large manufacturing building with adjacent mixing center and a technical center building. The site was developed in 1913 to manufacture rubber tires and tubes. In the 1930s and 1940s the site manufactured rubber toys and then soles for boots. The site was acquired by Cooper Tire and Rubber Company in the 1960s and began production of rubber-based automotive parts. ContiTech acquired the site in 2019.



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

We appreciate your input!



Investigations at the site began in 2004 in order to assess environmental impacts related to site activities. A Phase I Environmental Site Assessment identified the presence and use of 3 underground storage tanks (USTs), 4 aboveground storage tanks (ASTs), a former trichloroethylene (TCE) AST and associated release, a former 420,000 gallon fuel oil AST, and a former drum storage area for hazardous and non-hazardous wastes.

Additional investigations found TCE and arsenic in soil above published levels (PLs). Cis-1,2-dichloroethylene (cDCE), trans-1,2-dichloroethylene (tDCE), TCE, vinyl chloride (VC), 1,1-dichloroethane (1,1-DCA), 1,1-dichloroethylene (1,1-DCE), naphthalene, benzo(a)anthracene, benzo(a)pyrene, as well as total arsenic, cadmium, chromium, and lead were detected in groundwater above PLs. NAPL was observed in groundwater from 2 boreholes and 4 monitoring wells. Sub-slab soil gas samples showed PL exceedances of PCE and TCE and indoor air samples showed PL exceedances of ethylbenzene and 1,4-dichlorobenzene (1,4-DCB).

The site applied and was accepted into the Voluntary Remediation Program (VRP) in October 2023, and the Voluntary Remediation Agreement (VRA) was executed in January 2024. The VRIP was submitted in April 2024 and summarizes environmental investigation activities performed at the site to date as well as proposed activities.

Comments

1. The proposed scope of work is generally acceptable with the exception of the proposed QA/QC samples. While duplicate and trip blank samples will be collected, MS/MSD sample also needed to be included. Future sampling events must meet the IDEM Risk-based Closure Guide (R2) Level II Minimum Data Documentation Recommendations (MDDRs) as outlined on Table 2-B of R2.
2. Two historic water wells were identified on-site as having likely been abandoned. Haley and Aldrich also stated that no other potable water wells were identified within 0.5-miles of the site boundaries. The following on-site wells were identified via the IDNR Water Well Viewer and require confirmation of whether they are in service.

Well Reference #	Installation depth	Well Type/Details
#80085	70-ft bgs	Unspecified well type, not field located
#108316	61-ft bgs	Unconsolidated well, not field located
#22690	152-ft bgs	Unspecified well type, not field located
#80105	49-ft bgs	Unspecified well type, not field located
#108336	154-ft bgs	Unconsolidated well, field located
#108331	49-ft bgs	Unconsolidated well, field located
#108311	61-ft bgs	Unconsolidated well, field located
#00590	35-ft bgs	Significant withdraw well

3. The proposed sub-slab soil gas and indoor air samples are acceptable, but sampling should be conducted during summer worst-case conditions while the HVAC system is running (if possible).

These comments may be addressed in the proposed Assessment Report that summarizes the results of the proposed investigative activities. The consultant must notify IDEM prior to conducting field work. If you have any questions, please contact me at (317) 234-7758, (800) 451-6027, or at asergean@idem.in.gov.

Sincerely,



Andrew Sergeant, LPG
Project Manager
Voluntary Remediation Program
Office of Land Quality

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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.

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).