



# 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](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

June 20, 2024

## VIA ELECTRONIC MAIL

Ms. Debbie Metzger  
Twin Lakes School Corporation  
803 W. Ohio Street  
Monticello, IN 47960  
[dmetzger@twinlakes.k12.in.us](mailto:dmetzger@twinlakes.k12.in.us)

**Re: No Further Action Approval Determination Pursuant to  
Remediation Closure Guide**

Twin Lakes Bus Garage  
803 W. Ohio Street  
Monticello, IN 47960  
White County  
Facility ID #13373  
Incident #200609518

Dear Ms. Metzger:

IDEM staff received your No Further Action (NFA) request for the Twin Lakes Bus Garage facility located at 803 W. Ohio Street, Monticello, Indiana for Incident #200609518 (the Site).

IDEM reviewed the following document:

- No Further Action Request Report, prepared by Capital Enterprises, dated December 9, 2021, (Virtual File Cabinet Document #83252271)

The following is a summary of the current conditions at the Site for the subject release:

- Soil – Benzene remains in the soil at 18 milligrams per kilogram (mg/kg) which is above the Remediation Closure Guide (RCG) residential direct contact screening level of 17 mg/kg. All other chemicals of concern (COCs) are below the RCG residential direct contact screening level.
- Groundwater – Benzene remains in the groundwater at 7,270 micrograms per liter (µg/L) which is above the RCG tap water screening level of 5 µg/L. Naphthalene remains in the groundwater at 281 µg/L which is above the RCG



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*We appreciate your input!*



tap water screening level of 1.8 µg/L. All other COCs are below the RCG tap water screening level.

- Vapor Intrusion - Benzene remains in the groundwater at 7,270 µg/L which is above the RCG residential vapor intrusion screening level of 28 µg/L. Naphthalene remains in the groundwater at 281 µg/L which is above the RCG residential vapor intrusion screening level of 110 µg/L. All other COCs are below the RCG residential vapor intrusion screening level.

The following are additional lines of evidence regarding current conditions at the Site for the subject release:

- Residual soil contamination is at depth and not a direct contact exposure risk.
- Benzene is a volatile organic compound that evaporates readily and does not pose a long-term exposure risk.
- The Site is an active fueling facility.

Based on the technical reports reviewed by IDEM and the additional lines of evidence, IDEM concludes that no further response actions are required as long as the owner abandons the monitoring wells in accordance with 312 IAC 13-10-2 and complies with the conditions of this decision. This NFA determination is based on information known to IDEM at the time of issuance of this letter. If additional information is subsequently obtained by IDEM indicating that the Site poses a risk to human health or the environment, IDEM reserves the right to modify or revoke this NFA determination as the situation may warrant.

This NFA determination is based on Remediation Closure Guide non-rule policy document (NPD) guidelines and conditions:

- Unconditional closure for soil exposure
- Conditional closure for groundwater exposure
- Conditional closure for vapor intrusion exposure
- Recorded Environmental Restrictive Covenant (Virtual File Cabinet Document #83634273)
- Notice of Contamination within right-of-way sent to the City of Monticello (Virtual File Cabinet Document #83648641)

All wells installed associated with the release at the site must be permanently abandoned in accordance with the Indiana Department of Natural Resources (IDNR) regulation 312 IAC 13-10-2 (Permanent Abandonment of Wells) and IDEM's "Drilling Procedures and Monitoring Well Guidelines Non-rule Policy Document (Waste-0053)". Additionally, IDNR regulations require that Well Abandonment Forms be submitted to IDNR.

If you are eligible and will be seeking reimbursement from the Excess Liability Trust Fund (ELTF) for well abandonment activities, completed "Record of Water Well" (State Form 35680) for all wells (monitoring and treatment) should be signed by the licensed Well Driller and submitted as documentation in your ELTF Claim, in addition to

other required backup for reimbursement. **Submittal under separate cover is not required for technical approval.**

Please note that as required by 328 IAC 1-3-3(a)(4) you have three hundred sixty-five (365) days to submit all claims for reimbursement of costs from the Excess Liability Trust Fund after the eligible release is granted a status of NFA by the administrator. You therefore have until **June 20, 2025** to submit claims for reimbursement of eligible costs associated with this release. In addition, all re-submittals associated with any disallowed cost must be received by the department within three hundred sixty-five (365) days after the denial of the claim.

This is a determination of status that is an agency action described in I.C. 4-21.5-3-5. This determination is subject to review under IC 4-21.5 and takes effect fifteen (15) days after it is issued (eighteen (18) days if you receive this notice by U.S. Mail) unless review of this Order is requested before the fifteenth day (eighteenth day if you receive this notice by U.S. Mail), by filing a written request for review with the Office of Environmental Adjudication (OEA), and serving a copy of the request for review upon the Commissioner of the IDEM. You may request that the OEA conduct a hearing to review this determination under IC 4-21.5, in its entirety, or you may limit your request for review to specific findings of fact and/or determinations. You may also petition the OEA under 4-21.5-3-5(h) to stay the effectiveness of this determination of status. Petitions for Administrative Review and/or for a Stay of Effectiveness must be submitted separately to the OEA and the Commissioner of the IDEM at the following addresses:

Director  
Office of Environmental Adjudication  
Indiana Government Center North  
100 North Senate Avenue, Room N103  
Indianapolis, Indiana 46204

Commissioner  
Indiana Department of Environmental Management  
Indiana Government Center North  
100 North Senate Avenue, Room 1301  
Indianapolis, Indiana 46204

Failure to properly submit a request for review to the OEA, before the fifteenth day following issuance of this determination (eighteenth day if you receive this notice by U.S. Mail), waives your right to administrative review of this determination and your right to judicial review of the determination. The petition for administrative review must contain the following information:

- a. Name, address, and telephone number of each person filing the petition.
- b. Identification of the interest of each petitioner in the subject of the petition.
- c. Statement of facts demonstrating that the petitioner is:
  - (A) a person to whom the order is directed;
  - (B) aggrieved or adversely affected by the determination; or
  - (C) entitled to review under any law.

d. Statement with particularity the legal issues proposed for consideration in the proceedings.

The petition for administrative review should also contain the following information:

- a. Identification of any persons represented by the person making the request.
- b. Statement identifying the person against whom administrative review is sought.
- c. A copy of IDEM's determination that is the basis of the petition for administrative review.
- d. Statement indicating the identification of petitioner's attorney or other representative.

If you have procedural or scheduling questions regarding your petition for administrative review you may contact the OEA at (317) 232-8591 or see OEA's website at <http://www.in.gov/oea>.

This determination is based upon review of the documentation presented to IDEM as well as documents previously submitted and made available to the Petroleum Remediation Section. If additional information or documentation is subsequently provided, IDEM reserves the right to modify this determination as the situation may warrant. If you have any questions, please contact Roxann Sanders at (317) 234-0977 or toll free from within Indiana at (800) 451-6027. She may also be reached at: [rsanders@idem.IN.gov](mailto:rsanders@idem.IN.gov).

Sincerely,



Shay Hartley, Chief  
Petroleum Remediation Section  
Petroleum Branch  
Office of Land Quality  
(317) 234-5160  
[slhartle@idem.IN.gov](mailto:slhartle@idem.IN.gov)

ecopy: IDEM File

Mark Basch, IDNR Division of Water  
White County Health Department  
James Carr, Capital Environmental Enterprises, Inc.

## Ellis, Roberta

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**From:** Deb Metzger <dmetzger@twinlakes.k12.in.us>  
**Sent:** Wednesday, June 26, 2024 11:22 AM  
**To:** Ellis, Roberta  
**Cc:** SANDERS, ROXANN  
**Subject:** Re: IDEM PRS CORRESPONDENCE FID 13373 NFA

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This has been received.

*Debbie Metzger, Ed.S*  
Superintendent  
Twin Lakes School Corporation  
574-583-7211 ext. 1302  
574-297-1127 Cell



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**From:** Ellis, Roberta <REllis@idem.IN.gov>  
**Sent:** Wednesday, June 26, 2024 10:21 AM  
**To:** Deb Metzger <dmetzger@twinlakes.k12.in.us>  
**Cc:** SANDERS, ROXANN <RSANDERS@idem.IN.gov>  
**Subject:** FW: IDEM PRS CORRESPONDENCE FID 13373 NFA

You don't often get email from rellis@idem.in.gov. [Learn why this is important](#)

Hello,  
Could you please respond to the email that was sent to you on 6/20/2024? 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](mailto:rellis@idem.IN.gov)



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**From:** Ellis, Roberta

**Sent:** Thursday, June 20, 2024 2:01 PM

**To:** [dmetzger@twinlakes.k12.in.us](mailto:dmetzger@twinlakes.k12.in.us)

**Cc:** SANDERS, ROXANN <[RSANDERS@idem.IN.gov](mailto:RSANDERS@idem.IN.gov)>; Basch, Mark <[mbasch@dnr.IN.gov](mailto:mbasch@dnr.IN.gov)>; [patrick.shafer@whitecounty.in.gov](mailto:patrick.shafer@whitecounty.in.gov); [james@capenv.com](mailto:james@capenv.com)

**Subject:** IDEM PRS CORRESPONDENCE FID 13373 NFA

### **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  
Petroleum Branch | Office of Land Quality  
Indiana Department of Environmental Management

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(317) 232-8900 | [rellis@idem.IN.gov](mailto:rellis@idem.IN.gov)

