



June 27, 2024

Ms. Morgan Willis
Environmental Project Manager
Indiana Department of Environmental Management
Office of Land Quality
Petroleum Branch / Petroleum Remediation Section
100 North Senate Avenue, IGCN 11th Floor – Room 1101
Indianapolis, Indiana 46204-2251

**RE: RELEASE INVESTIGATION AND CONFIRMATION STEPS (RICS) - PREMIUM UNLEADED GASOLINE LINE & LEAK DETECTION TESTING RESULTS
LOVELY MOBIL, INC - CITGO QUICK MART
3077 BROADWAY AVENUE (STATE ROUTE 53)
GARY, LAKE COUNTY, INDIANA, 46409
IDEM FID: #18163
IDEM INCIDENT: #202404501
METRIC PROJECT: #P24-0128**

Dear Ms. Willis:

Metric Environmental, LLC (Metric) is pleased to provide you with “passing” premium unleaded gasoline line and leak detection testing results conducted on June 6, 2024, and received by Metric on June 19, 2024. The UST system testing was in response to the Indiana Department of Environmental Management (IDEM) *Release Investigation and Confirmation Steps Request* (RICS) letter (IDEM Virtual Filing Cabinet (VFC) Content ID #83626128) included as **Attachment A** and the April 8, 2024, Midwest Tank Testing (Midwest) premium unleaded gasoline line “failed” test results (IDEM VFC Content ID #83638080).

SITE DESCRIPTION

The Lovely Mobil, Inc. / Citgo Quick Mart Station (hereafter referred to as the “Site”) is located at 3077 Broadway Avenue (State Route [SR] 53), Gary, Calumet Township, Lake County, Indiana. The Site is located in a commercial area south of the City of Gary within the city limits. The Site and surrounding area are presented on the USGS Gary, Indiana 7.5 Minute Series Quadrangle 2022 Topographical Map as **Figure 1**.

A forested/wetland area is located north and east of the Site and the Little Calumet River is located to the east and south of the Site. Commercial properties are located to the south of the Site. To the west of the Site is Broadway Avenue (SR 53) followed by North Gleason Park. The layout of the Site and surrounding properties are shown on a Surrounding Area Map provided as **Figure 2**.

The Site consists of one (1) parcel of land (45-08-22-105-020.000-004) of 0.347 acres of land and is rectangular in shape. The Site has been improved with one (1) building that is approximately 1,421 square feet (sq./ft.) in size and is located in the northeast area of the Site and is currently an operating Citgo-branded petroleum retail station with a convenience store. A detached station canopy is located west of the station building and covers four (4) fuel dispenser units with eight (8) individual fuel pumps (#1 through #8). A Site Map depicting the Site layout and surface features is included as **Figure 3**.

The Site currently utilizes three (3) Underground Storage Tanks (USTs) that include one (1) 10,000-gallon regular gasoline UST, one (1) 10,000-gallon premium gasoline UST, and one (1) 10,000-gallon diesel UST situated in a common basin located in the east-central portion of the Site. The USTs were installed in 1996 and constructed of fiberglass with automatic tank gauging (ATG) and fiberglass reinforced plastic product piping.

The Site is serviced by all public utilities (i.e., water, sewer, electricity, etc.). Currently the location of any buried utilities located at the Site are unknown. Surface water at the Site appears to drain to Broadway Avenue (SR 53).

LUST INCIDENT #202404501

On March 27, 2024, the IDEM conducted a UST system inspection at the Station. The IDEM inspector observed fuel in some of the containments. In response to their observations, IDEM requested that a Leaking Underground Storage Tank (UST) Initial Incident Report (State Form #54487 [R2/3-16]) be prepared and submitted reporting a "Suspected Release". The IDEM inspection report has been saved on the IDEM VFC as Content IDs #83617946 and #83621963.

On March 28, 2024, IDEM prepared an *IDEM RM Record* (IDEM VFC Content ID #83630855) reporting "Emergency Response – Non-Reportable Spill" based on observation of product in the UST sump and UST monitoring well by IDEM personnel. IDEM believed that the source of the product was from overfill during a fuel delivery and there was no evidence of the product leaving the Site. IDEM requested that the station owner remove the product from the UST sump & monitoring well. In addition, IDEM requested that the station owner follow the "suspected" release notification protocol.

On March 28, 2024, Metric prepared and submitted an Initial Incident Report (IIR) (IDEM VFC Content ID #83619643) to the IDEM reporting a "Suspected Release".

On March 29, 2024, the station owner contracted with Green For Life Environmental Services USA Inc (GFL) to mobilize to the site and pump-out the water/fuel mixture from all of the containments and sumps. A total of 1,500 gallons were recovered and properly disposed. GFL's invoice and waste manifest was submitted to the IDEM on May 15, 2024, and has been saved as IDEM VFC Content ID #83618304.

On April 2, 2024, the IDEM issued a *Release Investigation and Confirmation Steps Request* letter (IDEM VFC Content ID #83626128) requesting additional environmental investigation activities be completed in accordance with portions of 40 CFR Part 280. In summary the letter the IDEM requested the following activities be completed in accordance with 40 CFR 280.52 "Release Investigation and Confirmation Steps":

1. You must conduct system testing, as specified in 40 CFR 280.43(c) and 40 CFR 280.44(b), or as appropriate, secondary containment testing described in 40 CFR 280.33(d). The test must determine whether:
 - i. A leak exists in that portion of the tank that routinely contains product, or the attached delivery pipe; or
 - ii. A breach of either wall of the secondary containment occurred.

2. If the system test confirms a leak into the interstice or a release, you must repair, replace, upgrade or close the UST system and begin corrective action in accordance with 40 CFR 280 Subpart F if the test results for the system, tank, and delivery piping indicate that a release exists.
3. If environmental contamination is the basis of the suspected release investigation, you must perform a site check, as specified in 40CFR Part 280.52(b) by measuring for the presence of a release where contamination is most likely to be present. If the results indicate a release has occurred, you must begin corrective action in accordance with 40 CFR 280 Subpart F.

If the results of the system test or site check confirm a release occurred, you must submit a “Confirmed Release Incident Report” to the LeakingUST@idem.in.gov inbox in accordance with 40 CFR 280.61.

On April 2, 2024, Metric contacted the IDEM Project Manager via email requesting clarification of the IDEM’s work requirements RICS Request letter (IDEM VFC Content ID #83626128). The IDEM responded “To clarify, the system testing is the RICS. If the system passes, and no other issues are found, then the incident will most likely be deactivated. If the system fails, then a “Confirmed Release” IIR would need to be submitted to IDEM and an ISC would need to be performed.”

On May 14, 2024, the IDEM sent an email to Metric requesting a status on the submittal of the RICS report. Metric responded requesting clarification of what IDEM was requesting at that time and submitted the Midwest Tank Testing’s April 8, 2024, product line testing results (IDEM VFC Content ID #83638080) to the IDEM. The testing results indicated that several repairs were needed and that the premium gasoline product line failed testing.

On May 14, 2024, the IDEM responded via email stating that “IDEM reviewed the submitted product line testing. Although the product line testing shows passing, additional system testing (hydrostatic test and/or soil sampling) is needed to demonstrate that the fuel found in the containments did not escape /leak out. You should submit the requested information to IDEM as an attachment to a Release Investigation and Confirmation Step Report by June 14, 2024.”

On June 6, 2024, the station owner contracted with B&K Equipment (B&K) to re-test the premium unleaded gasoline line and leak detection system (Veeder Root – PIIId). Based on the results, both the premium unleaded gasoline line and leak detection had “passing” results. Copies of B&K’s test results are included in **Attachment B**.

If you have any questions regarding this letter, please do not hesitate to contact us.

Sincerely,

METRIC ENVIRONMENTAL, LLC



Russell J. Schlukibir
Senior Project Manager
russells@metricenv.com



Karla K. McDonald, CHMM
Director - Assessment-Remediation and IH Services
karlam@metricenv.com

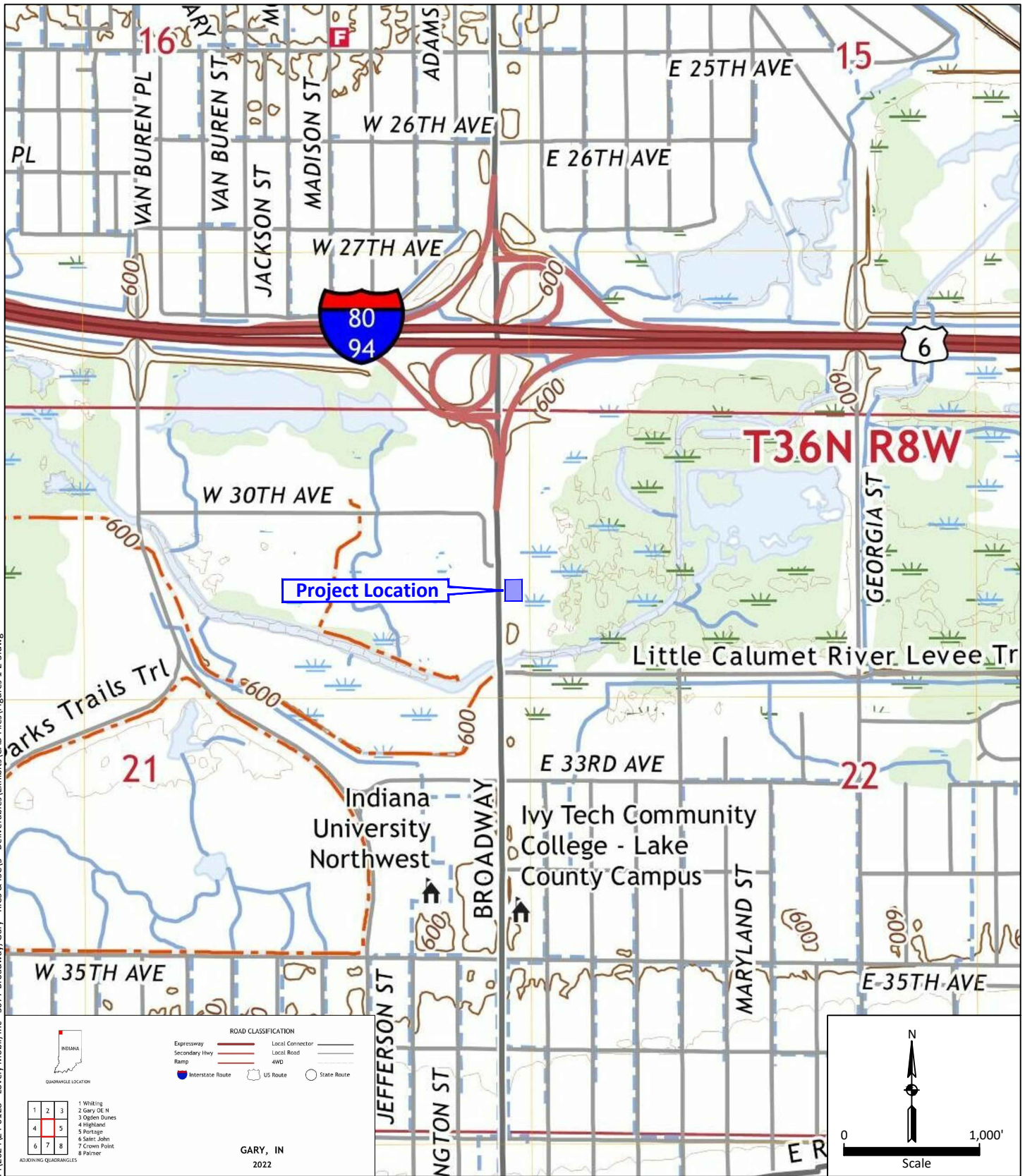
Figures

Figure 1 – USGS Topographic Map

Figure 2 – Surrounding Area Vicinity Map

Figure 3 – Site Map

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Source: <https://ngmdb.usgs.gov/topoview/viewer/#13/41.5626/-87.3362>

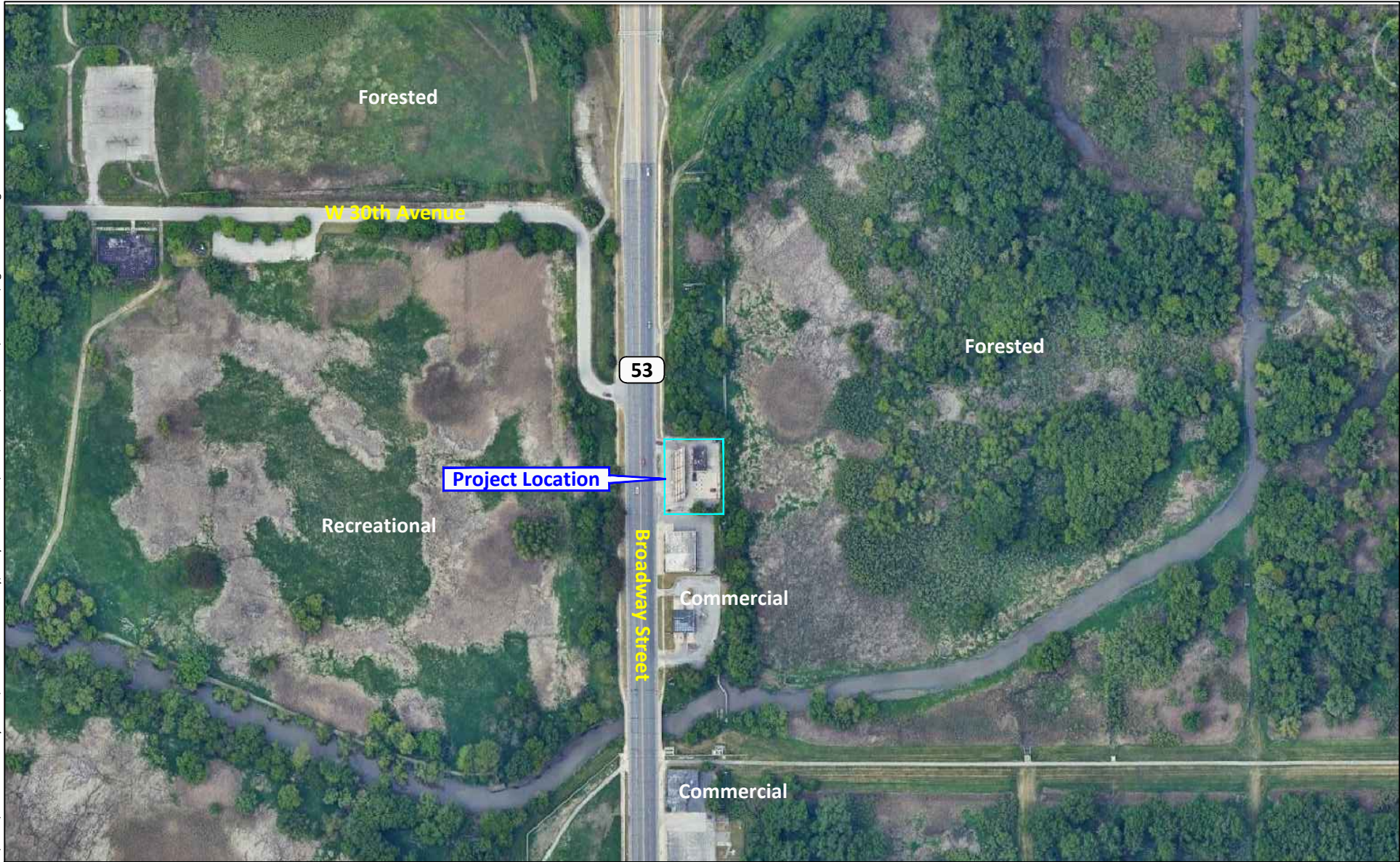
Figure 1 - USGS Topographic Map
Lovely Mobil, Inc.
3077 Broadway Street
Gary, Lake County, Indiana
Metric Project # P24-0128

All locations approximate

METRIC ENVIRONMENTAL

Drawn by: ILJ
Checked by: RS
Approved by: KM
Date: May, 2024

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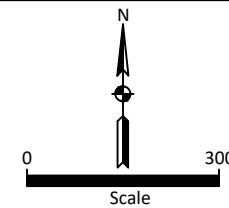


Source: Google Earth Pro

Figure 2 - Surrounding Area Vicinity Map

Lovely Mobil, Inc.
3077 Broadway Street
Gary, Lake County, Indiana
Metric Project # P24-0128

Note: All locations are approximate



Drawn by: ILJ
 Checked by: RS
 Approved by: KM
 Date: May, 2024

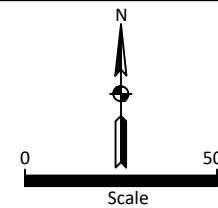


Source: Goggle Earth Pro

Figure 3 - Site Map

Lovely Mobil, Inc.
3077 Broadway Street
Gary, Lake County, Indiana
Metric Project # P24-0128

Note: All locations are approximate



Drawn by: ILJ
Checked by: RS
Approved by: KM
Date: May, 2024

APPENDIX A

IDEM *Release Investigation and Confirmation Steps Request* letter – Dated April 2, 2024



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

April 2, 2024

VIA MAIL

Mr. Manpal Singh
President
Rara Sahib Inc.
7237 Vale Drive
Scherverville, IN 46375

Re: **Release Investigation and Confirmation Steps Request**
Lovely Mobil Incorporated
3077 Broadway
Gary, IN 46409
Lake County
Facility ID #18163
Incident #202404501

Dear Mr. Singh:

A suspected release from an Underground Storage Tank (UST) at your facility was reported by Russ Schlukebir on March 28, 2024. Effective October 12, 2023, as the UST owner and/or operator of the Lovely Mobil Incorporated facility located at 3077 Broadway in Gary, Indiana, you are required to address this release in accordance with applicable portions of 40 CFR Part 280.¹ Unless corrective action is initiated in accordance with 40 CFR 280 Subpart F, you must conduct release investigation and confirmation steps as outlined in 40 CFR 280.52 within thirty days.

This letter provides IDEM's expectations for release reporting, response and investigation. Please note that for purposes of reimbursement from the Excess Liability Trust Fund (ELTF), duplicative work will not be deemed reasonable or cost effective and therefore, will not be reimbursable.

40 CFR 280.52 Release Investigation and Confirmation Steps

1. You must conduct system testing, as specified in 40 CFR 280.43(c) and 40 CFR 280.44(b), or, as appropriate, secondary containment testing described in 40 CFR 280.33(d). The test must determine whether:

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!



- i. A leak exists in that portion of the tank that routinely contains product, or the attached delivery piping; or
 - ii. A breach of either wall of the secondary containment occurred.
2. If the system test confirms a leak into the interstice or a release, you must repair, replace, upgrade or close the UST system and begin corrective action in accordance with 40 CFR 280 Subpart F if the test results for the system, tank, and delivery piping indicate that a release exists.
3. If environmental contamination is the basis of the suspected release investigation, you must perform a site check, as specified in 40 CFR Part 280.52(b) by measuring for the presence of a release where contamination is most likely to be present. If the results indicate a release has occurred, you must begin corrective action in accordance with 40 CFR 280 Subpart F.

If the results of the system test or site check confirm that a release occurred, you must submit a Confirmed Release Initial Incident Report to the LeakingUST@idem.in.gov inbox in accordance with 40 CFR 280.61.

Initial site characterization

The purpose of the initial site characterization (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
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.

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.

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 due date for the Release Investigation and Confirmation Steps report is April 27, 2024

IDEM requests Petroleum Remediation Section (PRS) correspondence, reports, and related documents under 15 MB be submitted electronically to:
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 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 Office of Land Quality Enforcement.

If you have any questions, please contact me at (317) 232-6695 or toll free from within Indiana at (800) 451-6027. I can also be reached at: MIWillis@idem.IN.gov.

Sincerely,



Morgan Willis
Environmental Project Manager
Petroleum Remediation Section
Petroleum Branch
Office of Land Quality

Ecopy: IDEM File
IDEM Underground Storage Tank Inspector
Russ Schlukebir, Metric Environmental LLC, russells@metricenv.com

APPENDIX B

B&K Equipment – Premium Unleaded Gasoline Line & Leak Detection Testing Results

Testing Conducted on June 6, 2024

ESTABROOK PRECISION LINE TEST

Facility Name: GARY CITGO
Facility Address: 3077 BROADWAY GARY IN 46409-1005
Facility ID: 18163

Test Date: 06/06/2024
Technician Name: Mark Huizenga
Technician Cert #: 041897

Applied Pressure: 50 PSI

#1 Product Type: Pul					
TIME	DATA	-/+	GPL	RES	GPH
9:00	73	0	0.0037	0.0000	0.0000
9:15	73	0	0.0037	0.0000	0.0000
9:30	73	0	0.0037	0.0000	0.0000
FINAL RESULT: PASS					

#2 Product Type:					
TIME	DATA	-/+	GPL	RES	GPH
FINAL RESULT:					

#3 Product Type:					
TIME	DATA	-/+	GPL	RES	GPH
FINAL RESULT:					

#4 Product Type:					
TIME	DATA	-/+	GPL	RES	GPH
FINAL RESULT:					


#5 Product Type:					
TIME	DATA	-/+	GPL	RES	GPH
FINAL RESULT:					

#6 Product Type:					
TIME	DATA	-/+	GPL	RES	GPH
FINAL RESULT:					

DATA = Numbered line increments on site glass.
-/+ = Change from previous 15-minute reading.
GPL = Gallons per Line on site glass.
RES = Result. Gain or loss of lines X .0037
GPH = Gallons per Hour. RES X 4

PASS Requirements:
3 consecutive readings within .020 GPH of each other
and final reading less than .050 GPH.

Technician Name: Mark Huizenga
Dispatch # 402971
B&K Equipment completes testing and inspections per recommended practices of PEI RP1200-19

Technician Signature: 

ESTABROOK LINE LEAK DETECTOR FUNCTIONALITY TEST

Facility Name: GARY CITGO
Facility Address: 3077 BROADWAY GARY IN 46409-1005
Facility ID: 18163

Test Date: 06/06/2024
Technician Name: Mark Huizenga
Technician Cert #: 041897

LEAK DETECTOR DETAILS

Pump	Make	Model	Serial #
1	Veeder root	PIId	Na

ESTA BROOK EZY CHEK TEST DATA

Pump	Product Type	Metering Pressure	Holding PSI	Resiliency	Test Leak Rate ML/MIN	Opening Time (3-5)	Result PASS/FAIL
1	Pul	39	22	100	189	Na	PASS

Comments

Technician Name: Mark Huizenga
Dispatch # 402971
B&K Equipment completes testing and inspections per recommended practices of PEI RP1200-19

Technician Signature: 