



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 10, 2024

VIA EMAIL

Stalcop, LP
c/o David A. Temple
Drewry Simmons Vornehm, LLP
736 Hanover Place, Suite 200
Carmel, IN 46032
Email: dtemple@dsvlaw.com

Re: **Progress Report – 4th Quarter 2023**
Former Stalcop Cold Forming, Inc.
127 South Pearl Street
Thorntown, Boone County
State Cleanup Site #0000882

Dear Mr. Temple:

The Indiana Department of Environmental Management (IDEM) has reviewed the *Progress Report – 4th Quarter 2023* (Q4 Progress Report), prepared and submitted by Cornerstone Environmental Health and Safety Inc. (CEHS). The Q4 Progress Report was submitted in response to a release(s) of hazardous substances at the former Stalcop Cold Forming, Inc. (SCF) located at 127 South Pearl Street (Site). The Progress Report is available in IDEM's Virtual File Cabinet (VFC) as document [#83589100](#). The VFC is located on IDEM's website at <https://vfc.idem.in.gov/>.

The document was evaluated based on IDEM's *Risk-based Closure Guide* ("RCG" or "R2") and *State Cleanup Program Guide* non-rule policy documents and *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (SW846) Third Edition, Update III. Non-rule policy documents are located at: <https://www.in.gov/idem/resources/nonrule-policies/effective-nonrule-policies/>. Based on the data submitted, IDEM has the following comments:

Comments

1. During Q4 of 2023, CEHS was unable to gain access to the off-site impacted property located at 122 Front Street. Therefore, CEHS planned to collect soil gas (SGe) samples along the Site's east property boundary to evaluate the vapor intrusion (VI) potential at the 122 South Front Street residence. As a supplement to this alternative, IDEM suggested the consultant submit an additional line of evidence (LOE) indicating that soil gas (SGe) sample results are representative of vapor beneath the slab. However, in early 2024, access was granted by the Site owner, and CEHS notified IDEM indoor air sampling at the residence at 122 South Front Street would be conducted in 2024.



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

We appreciate your input!



2. The interim sub-slab depressurization system (SSDS) installed in the Dickerson Custom Trucks (DCT) was in operation throughout the quarterly period. To monitor the system performance, vacuum levels were measured at each sub-slab soil gas (SGss) sampling point, and the system's effluent was sampled. Vacuum levels in the sub-slab sampling points indicate the interim SSDS is influencing the subsurface beneath DCT and Art Gallery. The concentration of TCE in the SSDS effluent has decreased from 3,050 µg/m³ to 71.0 µg/m³. The interim SSDS is operating as designed.
3. CEHS conducted quarterly groundwater monitoring. Six monitoring wells were sampled (MW-13, MW-16, MW-17, MW-20, MW-20S, MW-23) in the 4th Quarter of 2023. Results were consistent with previous sampling events, showing TCE GWPL exceedances in three wells: MW-13 (on-site), MW-16, and MW-20 (both off-site). IDEM indicated collecting samples from down-gradient wells, MW-22, MW-26, and MW-26S would be beneficial during plume behavior monitoring. CEHS responded that these down-gradient wells would be included in 2024.
4. Field duplicate sample results compared well. The laboratory reports were submitted with QA/QC documentation that met the R2 Level II elements, Minimum Data Documentation Requirements (MDDRs). The results can be used for quarterly monitoring.

Conclusions

Although access was not initially granted to 122 Front Street, this situation changed in early 2024, when the property owner began working with CHES and IDEM. The interim SSDS system appears to be functioning properly. CEHS indicated that groundwater monitoring would continue in 2024, and the IDEM requested down-gradient monitoring wells to be included in the sample events to demonstrate plume behavior. The Remediation Work Plan (RWP) was implemented at the Site following IDEM approval in August of 2023, and groundwater monitoring will continue in 2024 as part of the RWP. The RWP is available on the VFC as document [#83442284](#).

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the next Progress Remote to IDEM within 60 days of the date of this letter.

To reduce paper usage, reports must be submitted via State Cleanup's e-Submission Portal (ESP). Paper copies are no longer required or accepted; however, the project manager may request paper copies of figures and tables.

To request access to the ESP, complete State Agency Form 57103, available on IDEM's website at idem.in.gov/mysubmission. Please note that the size limit for an electronic document remains at 75 megabytes (MB) per IDEM Office of Land Quality electronic document submittal guidelines, which are available online at: www.in.gov/idem/landquality/2368.htm.

If you have any questions or comments concerning this matter, please contact me by phone at 317-232-2667 or by email at nkayden@IDEM.IN.gov, or you may call IDEM's toll free number at (800) 451-6027 and ask for Nora Kayden.

Sincerely,

Nora Kayden

Nora Kayden
State Cleanup Section
Office of Land Quality

cc: IDEM Site #0000882

Bruce Boltman, Principal Geologies, CEHS, ers@corner-enviro.com
Boone County Health Department, amessenger@co.boone.in.us

If a technical dispute arises and cannot be resolved in a timely manner, please see IDEM's website for information about appealing technical decisions through the Office of Land Quality's Technical Review Panel pilot program at: www.in.gov/idem/cleanups/2370.htm.