



**Greenfield Engineering & Planning**

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February 11, 2025

Board of Public Works and Safety  
10 S. State Street  
Greenfield, IN 46140

Re: Status of Underground Fuel Tanks for Riley Arts Trail construction project

Dear Members,

On November 12, 2024, the Board was informed of an abandoned fuel tank in need of removal on the south side of E. North Street for construction of the Riley Arts Trail. Subsequently on the same project, four more tanks were encountered for 21 and 23 W. North Street.

Executive Summaries of the closure and investigation reports for the unregulated underground storage tanks (USTs) to Indiana Department of Environmental Management (IDEM) are attached and full copies of the reports may be obtained by contacting the Engineering Department.

The consultant, 1 PRO Environmental, and their sub-consultant, Civil & Environmental Consultants, expect that IDEM will take 6-9 months to review the reports before they issue a no further action.

The cost for this work was funded by the Stormwater Utility and Staff does not intend to charge the property owners associated with the tanks.

No action is necessary, recommended **motion to receive the reports and place on file.**

A handwritten signature in blue ink that reads "Glen E. Morrow".

Glen E. Morrow, PE  
City Engineer

**UNREGULATED UST CLOSURE & INITIAL INVESTIGATION REPORT**

**CITY OF GREENFIELD RIGHT-OF-WAY  
EAST NORTH STREET  
GREENFIELD, HANCOCK COUNTY, INDIANA  
SPILL/INCIDENT #115002**

**Prepared for:**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF LAND QUALITY  
PETROLEUM REMEDIATION SECTION  
100 NORTH SENATE AVENUE, ROOM 1101  
INDIANAPOLIS, INDIANA**

**Prepared by:**

**CIVIL & ENVIRONMENTAL CONSULTANTS, INC.  
11 MUNICIPAL DRIVE, SUITE 300  
FISHERS, INDIANA**

**Prepared on behalf:**

**1 PRO ENVIRONMENTAL LLC  
&  
CITY OF GREENFIELD, INDIANA**

**CEC Project 348-202**

**January 31, 2025**



**Civil & Environmental Consultants, Inc.**

## EXECUTIVE SUMMARY

On behalf of 1 Pro Environmental, LLC, formerly known as 3 Pro Environmental, LLC (collectively referred hereinafter as “1 Pro”), and the City of Greenfield, Indiana (“City”), Civil & Environmental Consultants, Inc. (“CEC”) is pleased to provide this Unregulated Underground Storage Tank (UST) Closure and Initial Investigation Report to the Indiana Department of Environmental Management (IDEM) for the approximately 3,000-gallon unregulated heating oil UST located at the intersection of East (E.) North Street and North (N.) State Street (Indiana State Road 9) in the City of Greenfield, Hancock County, Indiana. This report was prepared in accordance with IDEM’s Independent Closure Process (ICP) Nonrule Policy Document (Waste-069-NPD).

On October 15, 2024, a steel manhole lid evident of a potential UST was uncovered during sidewalk removal and renovation for the City’s Riley Literal Arts Trail construction project. The UST was located underneath a concrete sidewalk in the City’s right-of-way (ROW) that borders the southern side of E. North Street, approximately 25 to 50 feet east of the intersection of E. North Street and S. State Street in the downtown area of Greenfield, Indiana.

Following the manhole discovery, the City contracted 1 Pro to conduct response measures and properly close the unregulated UST. Due to the presence of several buried utilities in very close proximity, the UST was unable to be removed by 1 Pro as intended. Therefore, from October 23 through October 26, 2024, 1 Pro performed an in-place closure of the unregulated UST, which consisted of the removal of residual liquid and sludge from the UST via a vacuum truck for off-Site disposal and filling the UST with aggregate material. A suspected historical heating oil release was also reported to IDEM’s Office of Land Quality due to the presence of petroleum odors and visible staining observed in surrounding soils. IDEM’s Emergency Response (ER) program subsequently assigned the suspected release incident number 115002.

1 Pro also conducted limited remediation, which consisted of the excavation and disposal of 17.72 tons of petroleum impacted soils that were accessible around the UST. Due to the aforementioned location of several buried utilities near the UST, additional soil excavation was unable to be

performed. The petroleum impacted soil was transported for disposal at South Side Landfill in Indianapolis, Indiana.

Following the initial response, soil excavation and UST closure activities, CEC performed initial investigation activities at the Site, which consisted of the advancement of four soil borings (SB-1 through SB-4) in each cardinal direction around the UST to facilitate collection of subsurface soil and/or groundwater samples for laboratory analysis to determine if a historical spill/release from the UST had impacted the subsurface at levels exceeding IDEM's Published Levels for evaluating potential exposure scenarios.

Shallow soil samples were collected for laboratory analysis from each soil boring location from the depth interval deemed most likely to contain impacts based on field screenings, visual and olfactory observations, and the estimated depth of the UST. Due to the lack of groundwater in the soil borings to a depth of 20 feet below ground surface (ft-bgs), a groundwater sample was not collected. Therefore, in lieu of a groundwater sample, a deeper soil sample was collected for laboratory analysis from the bottom (18 to 20 ft-bgs) of the soil boring location which indicated the most likely potential for impact based on field screenings and visual and olfactory observations. Laboratory analytical results for the subsurface soil samples collected during the investigation activities indicated all release-related chemicals (RRCs) were below laboratory reporting limits and therefore did not indicate evidence of significant impacts.

While the presence of a petroleum odor and elevated field screenings were found in one soil boring located near the western end of the UST, thereby indicating that a historical release of heating oil likely occurred from the unregulated UST, current RRC concentrations are below IDEM's applicable Published Levels for evaluating potential exposure risks. Therefore, there appears to be no current threat to human health or the environment.

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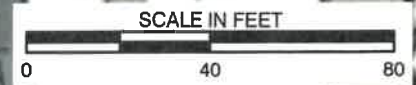


**REFERENCES**  
 1. AERIAL IMAGERY OBTAINED VIA PLEX.EARTH,  
 GOOGLE EARTH IMAGERY DATED: 09/28/2021,  
 ACCESSED 12/20/2024



**LEGEND**

- CLOSED IN-PLACE UNREGULATED HEATING OIL UST
- SOIL BORING (SB) / SAMPLE



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**E. NORTH STREET UST INVESTIGATION  
 INCIDENT #110522  
 GREENFIELD, INDIANA**

**SITE MAP**

DRAWN BY:	MHS	CHECKED BY:	DRAFT	APPROVED BY:	DRAFT*	FIGURE NO:	2
DATE:	12/20/2024	SCALE:	1"=40'	PROJECT NO:	348-202.0001		

\*Hand Signature on file



January 31, 2025

Ms. Nawal Hopkins  
Indiana Department of Environmental Management  
Petroleum Remediation Section  
Petroleum Branch  
100 North Senate Avenue, Room 1101  
Indianapolis, Indiana 46204

Dear Ms. Hopkins:

Subject: Unregulated Underground Storage Tanks Closure &  
Release Investigation Report  
21 and 23 West North Street  
Greenfield, Hancock County, Indiana 46140  
Incident No. 0001274  
CEC Project No. 348-202.0002

Civil & Environmental Consultants, Inc., on behalf of 1 Pro Environmental LLC and the City of Greenfield, Indiana, is pleased to submit the attached Unregulated Underground Storage Tanks (UST) Closure & Release Investigation Report to the Indiana Department of Environmental Management (IDEM) for the property located at 21 and 23 West North Street in Greenfield, Hancock County, Indiana, identified as IDEM Incident Number 0001274 (the Site). This report was prepared in accordance with IDEM's request in their Independent Closure Process Approval and Initial Investigation Report Request letter dated January 8, 2025.

Please contact us at 317-570-8800 or via email at [nhyde@cecinc.com](mailto:nhyde@cecinc.com) (Nate) or [tpippin@cecinc.com](mailto:tpippin@cecinc.com) (Tonia) should you have any questions or require further information.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

Nathan W. Hyde  
Project Manager

Tonia N. Pippin, CHMM  
Senior Project Manager

Enclosure: Unregulated UST Closure & Release Investigation Report

**UNREGULATED UNDERGROUND STORAGE TANKS CLOSURE &  
RELEASE INVESTIGATION REPORT**

**21 & 23 WEST NORTH STREET  
GREENFIELD, HANCOCK COUNTY, INDIANA  
IDEM EMERGENCY RESPONSE INCIDENT #115494  
IDEM PETROLEUM REMEDIATION SECTION INCIDENT #0001274**

**Prepared for:**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
PETROLEUM REMEDIATION SECTION  
OFFICE OF LAND QUALITY, PETROLEUM BRANCH  
100 NORTH SENATE AVENUE, ROOM 1101  
INDIANAPOLIS, INDIANA**

**Prepared by:**

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**CEC Project 348-202**

**January 31, 2025**



**Civil & Environmental Consultants, Inc.**



## EXECUTIVE SUMMARY

On behalf of 1 Pro Environmental, LLC, formerly known as 3 Pro Environmental, LLC (collectively referred hereinafter as “1 Pro”), and the City of Greenfield, Indiana (“City”), Civil & Environmental Consultants, Inc. (“CEC”) is pleased to provide this Unregulated Underground Storage Tanks (UST) Closure & Release Investigation Report to the Indiana Department of Environmental Management (IDEM) for the four unregulated heating oil USTs located at 21 and 23 West (W.) North Street, Greenfield, Hancock County, Indiana. This report was prepared in accordance with IDEM’s Independent Closure Process (ICP) Nonrule Policy Document (Waste-069-NPD).

On November 7, 2024, three unregulated heating oil USTs, estimated to be approximately 750-gallons in capacity each based on their dimensions, were uncovered within the City right-of-way adjoining 23 W. North Street during sidewalk removal and renovation for the City’s Riley Literal Arts Trail construction project. Subsequently, on November 12, 2024, a fourth unregulated heating oil UST, estimated to be approximately 500-gallons in capacity, was subsequently found within the City ROW adjoining 21 W. North Street.

Following the initial discovery, the City contracted 1 Pro to provide response measures, including uncovering and visually inspecting the USTs and surrounding area for evidence of a potential release, cleaning and removing the USTs, and performing over-excavation of impacted soils. A suspected historical heating oil release was also reported to IDEM’s Office of Land Quality due to the presence of petroleum odors and visible staining observed in surrounding soils. IDEM’s Emergency Response (ER) Program assigned the release ER Incident No. 115494. IDEM’s ER Program subsequently reassigned the incident to IDEM’s Petroleum Remediation Branch on December 8, 2024, and the Site was assigned IDEM Incident No. 0001274.

From November 8 through November 13, 2024, 1 Pro, on behalf of the City, conducted the following spill response, remediation, and UST closure activities:

- Removal and off-Site disposal of 36.7 tons of residual heating oil impacted water and sludge from the four USTs.

- Closure of the four unregulated USTs on-Site via removal and transportation off-Site.
- Excavation and off-Site disposal of 37.97 tons of heating oil impacted soils that were accessible around the USTs. Subsequent backfilling activities were completed on November 13, 2024.

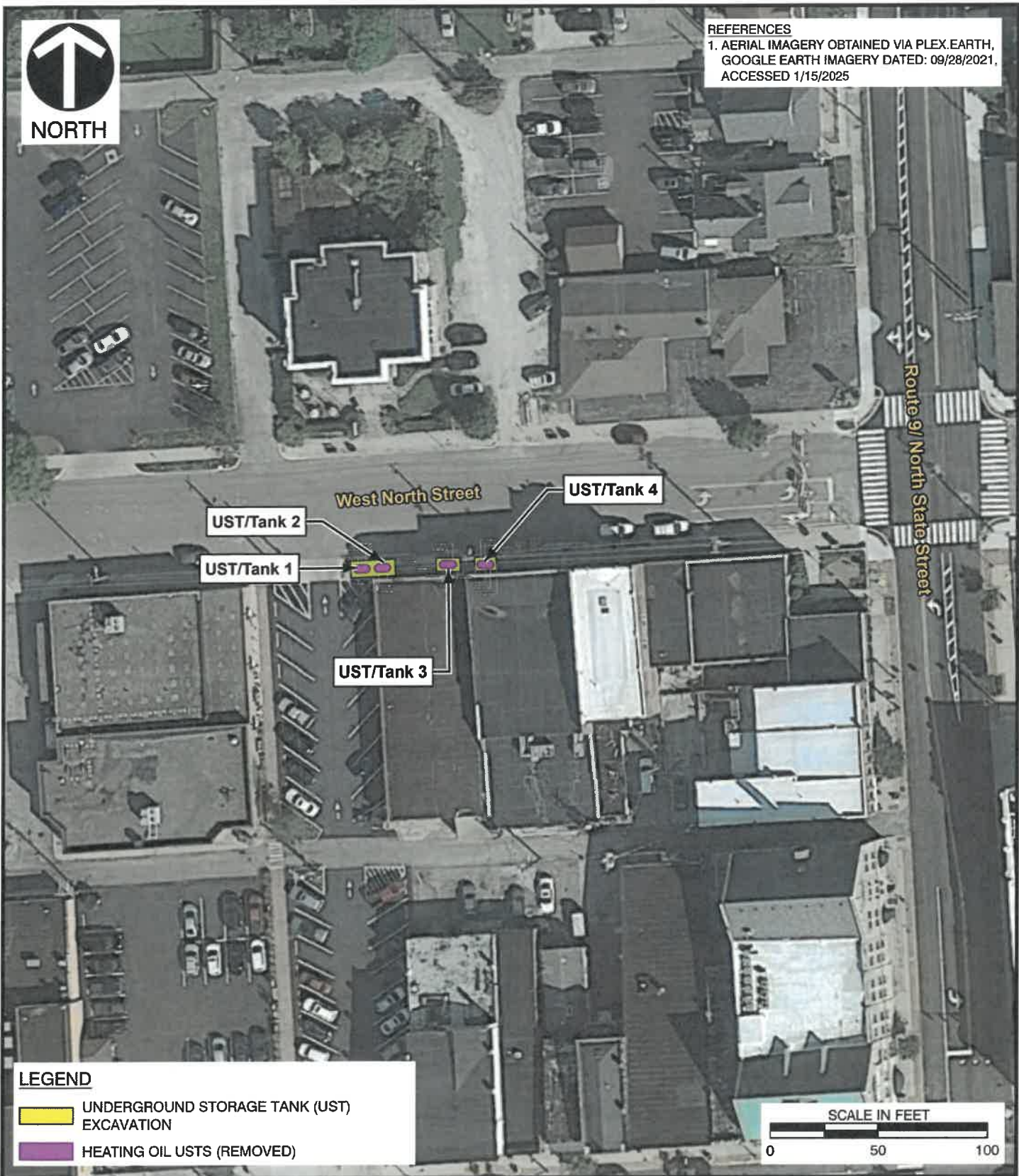
As part of the release investigation activities, and in accordance with IDEM's UST closure guidance as cited in their Risk-based Closure Guide (R2) dated July 8, 2022, following removal of the USTs and over-excavation of impacted soils, CEC collected confirmation soil samples from the bottom and sidewalls of each of the UST excavations to determine if historical spill(s)/release(s) from the USTs had impacted the Site's subsurface at levels exceeding IDEM's Published Levels. Groundwater was not encountered in the excavations and thus was not sampled.

In total, soil samples were collected and submitted for laboratory analysis of release-related chemicals (RRCs) from 20 locations within the excavations on-Site. Laboratory analytical results of the confirmation soil samples indicated the presence of one or more petroleum-related RRCs in nine of the 20 soil sample locations, including a minimum of one sample location in each of the three UST excavations (i.e., concentrations exceeding their respective laboratory reporting limits). However, all detected RRC concentrations were below their respective IDEM Published Levels for evaluating potential exposure risks.

While elevated PID readings, petroleum staining and odor observed in surrounding soil indicate that historical releases of heating oil likely occurred from the USTs, it appears that the associated impacts in subsurface soil were contained in localized areas around the USTs, which were then excavated by 1 Pro and disposed of at a municipal solid waste landfill. The remaining subsurface impacts appear to have biodegraded to levels below IDEM's applicable Published Levels for evaluating potential exposure risks. Evaluation of potentially susceptible areas indicates there are no completed exposure pathways associated with the heating oil spill. As such, there appears to be no current threat to human health or the environment. Furthermore, the remaining sludge and contents of the UST were removed and the USTs were removed and disposed off-Site, thereby eliminating the threat of a future release. Based on above-stated conclusions, it is CEC's opinion that no further investigation is necessary and closure is warranted for IDEM Incident No. 0001274.



**REFERENCES**  
 1. AERIAL IMAGERY OBTAINED VIA PLEX.EARTH,  
 GOOGLE EARTH IMAGERY DATED: 09/28/2021,  
 ACCESSED 1/15/2025



**LEGEND**

- UNDERGROUND STORAGE TANK (UST)  
EXCAVATION
- HEATING OIL USTs (REMOVED)



P:\340-000\348-202\GIS\Maps\EN01\_NorthSt\_USTs\_Phase1\348202\_EN01\_NorthSt\_USTs\_Phase1.aprx 1/15/2025 4:00 PM (msimkins)



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**W. NORTH STREET UST EXCAVATIONS  
 21-23 W. NORTH STREET  
 GREENFIELD, INDIANA**

**SITE MAP**

<b>DRAWN BY:</b> MHS	<b>CHECKED BY:</b> NWH	<b>APPROVED BY:</b> TNP*	<b>FIGURE NO:</b> 2
<b>DATE:</b> 1/15/2025	<b>SCALE:</b> 1"=60'	<b>PROJECT NO:</b> 348-202.0002	

\*Hand Signature on file