



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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May 14, 2009

Ms. Leatha Blazetic  
317 Blue Jacket Run  
Fort Wayne, IN 46825

Re: Further Site Investigation Work Plan  
Review  
Former Midwest Rail  
1539 Estella Avenue  
New Haven, Indiana  
VRP #6070801

Dear Ms. Blazetic:

This office has completed review of the Further Site Investigation (FSI) Work Plan submitted April 16, 2009 for the Former Midwest Rail facility in New Haven, Indiana. The report was reviewed to determine compliance with appropriate IDEM guidance and generally accepted industry standards. The IDEM has determined that the FSI Work Plan is acceptable with the following modifications.

Comments:

1. Chlorinated solvent concentrations at the site are significantly above the RISC Industrial Default Closure Levels (IDCLs). The chlorinated solvent concentrations need to be defined to RISC Residential Default Closure Levels (RDCLs) down to the confining unit beneath the aquifer surface via the collection and analysis of soil and groundwater samples. This is to determine whether the solvent release has migrated downward beneath the groundwater surface.
2. The source of metals contamination on the east portion of the site needs to be investigated, or shown to be naturally-occurring by proper background sampling.
3. Groundwater gradient and velocity calculations were not included in the work plan and need to be submitted after the monitoring wells are installed.
4. The consultant needs to evaluate the potential for vapor intrusion (VI) based on the proximity of the occupied buildings to the areas of contamination. A VI investigation needs be performed for the site building and contaminant areas within 100 feet of potential receptors. The IDEM recommends that the consultant use the IDEM Draft Vapor Intrusion Pilot Program Guidance dated April 26, 2006 to evaluate the potential for vapor intrusion at the site.
5. The proposed monitoring well water quality measurements need to include the groundwater stabilization data for low-flow sampling parameters. Additionally, the procedures used to collect the water quality measurements need to be submitted in addition to any calibration data. The final pumping rate and stabilized drawdown for each well need to be presented to show whether cascading within the well screens is occurring during pumping. The use of a negative pressure peristaltic pump as proposed is not recommended; the use of a positive displacement bladder pump is requested. Low flow sampling need to be completed according to the procedures outlined in IDEM's "Micro-Purge Sampling for Monitoring Wells, OLQ Geological Services Technical Memorandum" dated January 8, 2003.

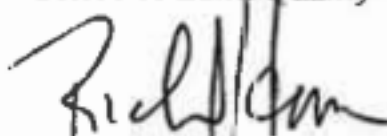
6. The proposed monitoring wells must be constructed according to the requirements of State Rule 312 IAC 13-8-3. The boring logs and monitoring wells need to identify the drillers name and licensing number according to State Rule 312 IAC 13-2-6. Additionally, the monitoring well total depths, along with the screened intervals with respect to the depths to groundwater, need to be included in a groundwater elevation table.
7. The cyanide method SW-846 335.2 should be clarified. Cyanide method 335.2 is an EPA method and cyanide method 9014 is a SW 846 method. According to the QAPP, Table 2 indicates that SW-846 9014 will be used. Both methods (EPA 335.2 and SW-846 9014) are acceptable.
8. The QAPP should be modified to correct the RPD value to less than/equal to 20% and not 100% as documented on page 14. Also, the SOP for Geoprobe Groundwater Sampling states to use a peristaltic pump for sample collection. However, this SOP should also state that for VOCs a peristaltic pump should not be used for collection. Nonetheless, the groundwater sample collection SOP does state this correctly.
9. The monitoring wells should be analyzed quarterly to monitor the plume of contamination.
10. When analytical results will be used for final nature and extent or for closure, full QA/QC documentation, including raw data, is needed to allow for data validation. Full QA/QC requirements may be found on the IDEM website at [www.in.gov/idem/files/risktech\\_app2.pdf](http://www.in.gov/idem/files/risktech_app2.pdf)

When the additional investigations take place at the site, please inform IDEM of the dates so that representatives may be present. Please respond to the above comments within 60 days from receipt of this letter. If you have any questions, please contact me at (317) 233-2991, (800) 451-6027, or at [ebrittai@idem.in.gov](mailto:ebrittai@idem.in.gov).

Sincerely,



Erin Brittain, Project Manager  
Voluntary Remediation Program  
Office of Land Quality



Richard Harris, Section Chief  
Voluntary Remediation Program  
Office of Land Quality

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