INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Indianapolis, Indiana 46204
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www.idem.IN.gov

August 25, 2008

CERTIFIED MAIL 7007 1490 0000 0838 5251
Mr. Mike Goldstein
GE Consumer and Industrial
Appliance Park AP 26-100
Louisville, KY 40225

Re: **Further Site Investigation Request**
GE Consumer and Industrial
Building 36
Northwest Intersection of
College & Wall Streets
Fort Wayne, Allen County
State Cleanup Site # 2007-05-145

Dear Mr. Goldstein:

The Indiana Department of Environmental Management (IDEM) has reviewed the file pertaining to a release of petroleum product and hazardous substances at the GE Consumer and Industrial facility located at the northwest intersection of College and Wall Streets in Fort Wayne, Indiana (Site). Specifically, the following documents, prepared by SES Environmental on behalf of GE Consumer and Industrial, were reviewed:

- *Background Sampling Report*, dated March 28, 2008; and
- *Additional Investigation Report* (FSI Report), dated April 3, 2008.

IDEM has determined that you must conduct a Further Site Investigation (FSI) in order to fully delineate the nature and extent of contamination in accordance with Indiana Code (IC) 13-24-1-6 and IC 13-25-4. Guidance on how to characterize the nature and extent of the contamination can be found in IDEM's *Risk Integrated System of Closure (RISC) Technical Resource Guidance Document*, February 2001. The RISC guidance documents are available online at **www.in.gov/idem/4153.htm**.

Listed below are General and Specific Comments which must be addressed in the FSI Report.

General Comments

The Site is located in a mixed residential and commercial area of Fort Wayne and was most recently used for offices, warehousing and fire safety training. Historical operations at the Site consisted of manufacturing with punch press and metal forming operations reportedly occurring in Building 36. Punch press and other manufacturing operations ceased at the Site in 2000, while all other operations ceased in 2006.

During an initial investigation conducted in March 2007, trichloroethene (TCE) and related degradation products were identified in the ground water at concentrations exceeding the RISC industrial default closure levels (IDCLs) and/or residential default closure levels (RDCLs). Copper, lead, arsenic and total petroleum hydrocarbons (TPH) diesel range organics (DRO) were detected in the soil at concentrations exceeding the IDCLs and/or RDCLs.

An additional 14 soil borings were advanced during investigations conducted at the Site in November 2007 and February 2008. Background arsenic sampling was conducted in December 2007. Background arsenic concentrations of 21 milligrams per kilogram (mg/kg) for sand and 12.4 mg/kg for clay surface soil were calculated for the Site. The background soil concentrations can be used for comparison of arsenic concentrations found in similar soil types.

Specific Comments

1. Several semi-volatile organic compounds (SVOCs) were detected at concentrations exceeding the IDCLs and/or RDCLs in soil samples collected at soil borings SB4, SB31 and SB33. TPH-DRO was detected at concentrations exceeding the RDCL at soil borings SB3, SB4, SB5, SB6, SB27, SB28 and SB32. The full extent of soil contamination must be defined north, east and west of soil boring SB4, west of soil boring SB32, west and south of soil boring SB28 and south of soil boring SB27. SVOC contamination found at soil boring SB33 must be vertically and horizontally defined to RISC RDCLs. Additionally, soil samples must be collected at the terminus of every soil boring in order to vertically define the extent of contamination.

2. The laboratory reporting limits for benzo(a)pyrene and dibenzo(a,h)anthracene exceeded the RISC RDCLs for soil samples collected at 0.5 to 2 feet below ground surface (bgs) and 6 to 8 feet bgs in soil boring SB3. Figure 8 of the FSI Report indicates that a soil sample was collected at 0.5 to 2 feet bgs at soil boring SB30. However, the chain of custody and laboratory report state that the soil sample was collected at 6 to 8 feet bgs. Therefore, the western extent of shallow soil contamination found at soil boring SB4 has not been defined. A soil sample must be collected west of soil boring SB4 at 0.5 to 2 feet bgs in order to complete the horizontal delineation of SVOC contamination.

3. The extent of TPH-DRO contamination found at soil borings SB4, SB27, SB28 and SB32 at concentrations exceeding the RDCL has not been defined. Additional soil samples must be collected south and west of soil borings SB27 and SB28, north of soil boring SB4, and

north, south and west of soil boring SB32. The vertical extent of TPH-DRO contamination must be defined at soil borings SB3, SB4, SB5, SB6, SB27 and SB28.

4. Copper was detected at a concentration of 31,400 mg/kg and mercury was detected at 30.5 mg/kg in a soil sample collected at soil boring SB10/MW-3, which exceeds the respective RISC IDCL of 2,900 mg/kg for copper and the RDCL of 2.1 mg/kg for mercury. Additionally, lead was detected at concentrations up to 576 mg/kg exceeding the IDCL 230 mg/kg. The complete horizontal extent of metals contamination must be defined to the RISC RDCLs.

5. SVOCs were detected at concentrations exceeding the RISC IDCLs in soil samples collected from soil borings SB4, SB31 and SB33. Therefore, ground water samples must be analyzed for SVOCs at these locations in addition to volatile organic compounds (VOCs), metals and TPH-DRO.

6. TPH-DRO was detected above the RISC RDCL in soil samples collected at soil borings SB3, SB4 and SB5. Ground water samples must be collected from these locations and analyzed for TPH-DRO and SVOCs.

7. TCE was detected at a concentration of 160 micrograms per liter (µg/L) in a ground water sample collected at monitoring well MW-2, which exceeds the IDCL of 31 µg/L. The complete vertical and horizontal extent of ground water contamination must be defined to RISC RDCLs as requested in an IDEM letter dated October 4, 2007. Further delay in characterizing ground water contamination is unacceptable.

8. The FSI Report states that "monitoring wells MW-1 and MW-3 may remain, providing there is understanding that these wells may be 'seasonally' dry". TCE was detected in the soil at soil boring SB13/MW-1 at the RDCL of 57 micrograms per kilogram (µg/kg). Additionally, TCE was detected in the ground water at monitoring wells MW-1 and MW-2 at concentrations exceeding the IDCL and/or RDCL. Monitoring well locations MW-1 and MW-2 must be capable of producing a ground water sample at each sampling event. Since monitoring well MW-1 had only 0.5 feet of water during the previous sampling event, this well must be replaced in order to intercept the water table and produce a representative sample at each monitoring event.

Conclusions

The complete extent of soil and ground water contamination has not been defined at the Site. Additional delineation of SVOC, TPH-ERO and metals soil contamination is required. TCE contamination found above the RISC IDCL in ground water must be delineated to the RISC RDCL. Further delay in defining the extent of ground water contamination is unacceptable to IDEM. Ground water must be investigated in areas with elevated concentrations of SVOCs and TPH-ERO in soils. Ground water samples must be analyzed for TPH-ERO, SVOCs, metals and VOCs.

IDEM requires at least one (1) week advance notice for field activities. Please submit three (3) hard copies and one (1) electronic copy of the FSI within 60 days from the date of this letter to the following address:

MC 66-30
Indiana Department of Environmental Management
Office of Land Quality
State Cleanup Section; Attn: Mindy Baker
100 N. Senate Ave., IGCN, Room 1101
Indianapolis, IN 46204-2251

IDEM requests that the FSI Report follow the general report outline format as provided in Appendix 1 of the IDEM's RISC *User's Guide*. Failure to provide this information in a timely and complete manner may subject you to civil penalties, pursuant to IC 13-30-4-1.

Be advised that under Indiana's Petroleum law, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and the Indiana Hazardous Substances Response Trust Fund (HSRTF) law, an owner, operator or responsible person is liable for the costs of response or remediation incurred by the State. The responsible party is required to reimburse IDEM for costs of oversight incurred during this project (IC 13-24-1-4 and IC 13-25-4-8). In addition, the responsible party may be ordered by the State to conduct removal or remediation actions (IC 13-24-1-1 and 13-25-4-9).

If you have any questions, please contact me at 317/233-2406 or toll free from within Indiana at 800/451-6027.

Sincerely,

Mindy Baker

Mindy Baker, Project Manager
State Cleanup Section
Office of Land Quality

MB/elg
cc: State Cleanup File # 2007-05-145
Mr. Glen Howard, SES Environmental, 3807 Transportation Drive, Ft. Wayne, IN 46818

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66-30 MB/elg
Mr. Mike Goldstein
GE Consumer and Industrial
Appliance Park AP 26-100
Louisville, KY 40225

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Louisville, KY 40225

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