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December 17, 2002

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VIA FEDERAL EXPRESS

Brent Dayharsh
Project Manager
Voluntary Remediation Program
Indiana Department of
Environmental Management
Office of Land Quality
100 N. Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

Re: Remediation Work Plan Review:
Mariah Foods, Inc., Columbus, IN
VRP# 6970606

Dear Mr. Dayharsh:

By this letter, Mariah responds to IDEM's comments to Mariah's Remediation Work Plan ("RWP"), dated October 10, 2002, and incorporates the further comments by IDEM and agreement reached between Mariah and IDEM on December 9, 2002. Included below are IDEM's comments and Mariah's reply for easier reference.

Comments relating to soil sampling and technical issues with the format of the RWP require August Mack to prepare and submit additional information. As noted in the reply to those comments, August Mack will submit such information to IDEM no later than January 31, 2003.

In the interim, Mariah has proposed a revised groundwater sampling schedule and well network in its reply to Comments 1 and 4. Per our discussion on December 9, 2002, Mariah would appreciate IDEM's immediate attention to the groundwater sampling plan so that Mariah may proceed with the sampling in February 2003. As we expressed at the meeting, Mariah is interested in completing the RWP as soon as possible.



Brent Dayharsh
December 17, 2002
Page 2

1. The RWP contains a proposal for a single confirmation sampling event for groundwater. This is not sufficient. VRP requires a minimum of 4 consecutive quarters of groundwater sampling with all constituents below the target cleanup goals. The Mariah site has not had any sampling events to this point where all of the monitoring wells were sampled and met cleanup objectives. The January, 2002 sampling was only conducted on a very limited number of wells and constituents and it should be noted that 1,2,4-Trimethylbenzene exceeded the IDEM RISC Industrial cleanup goal for both this and the July, 2001 sampling events.

REPLY: Mariah agrees to conduct four consecutive sampling events for groundwater, and IDEM and Mariah have agreed to conduct the sampling in the months of February, April, July and September. Mariah and IDEM agreed that a Level 4 data package is necessary only for IDEM's confirmation sampling event, most likely July.

IDEM also agreed to consider a Tier III calculation for 1,2,4-Trimethylbenzene if it becomes necessary. August Mack will submit that calculation by January 31, 2003.

2. There must be confirmation sampling for both soil and groundwater. A VRP representative will split samples at the time of confirmation sampling. The soil and groundwater confirmation sampling events do not need to be held at the same time. A detailed description of the sampling plan should be submitted to IDEM for review. It is recommended that low-flow sampling be used for all ground water samples rather than switching sampling methods back and forth. The reduced agitation of the water sample in low-flow sampling should give more accurate readings for dissolved VOCs along with reduction of the turbidity which tends to affect SVOC and metals concentrations.

REPLY: While Mariah believes that the results of soil and groundwater sampling to date demonstrate that there is no soil contamination above Tier II Non-residential goals, Mariah will develop and submit a soil sampling plan to IDEM to secure closure. August Mack will submit a soil sampling plan to IDEM by January 31, 2003. IDEM acknowledged that, per the Resource Guide, the soil confirmation

Brent Dayharsh
December 17, 2002
Page 3

sampling will be focused on areas where there was evidence of contamination and on the constituents found in those areas.

Mariah also agrees to sample groundwater using low-flow sampling techniques.

3. There appears to be no discussion of contaminant characteristics as required in Section 2.2.1C.

REPLY: Mariah will provide a discussion of contaminant characteristics as required in Section 2.2.1C. August Mack will submit that material by January 31, 2003.

4. The proposed number of monitoring wells to be used for confirmation sampling is insufficient to cover the entire site. Monitoring wells MW-18, 19 and 20 should be added to the monitoring well network for these events. Also, MW-8, which was listed as being damaged or destroyed, should be replaced as the most recent sample from this well had a reported benzene concentration of 1100 ppb. MW-8 was located down-gradient from the former gasoline UST area and from MW-2, which has historically had high levels of VOCs. There may also be a need for an up-gradient well to replace MW-9.

REPLY: Mariah disagrees that the number of monitoring wells it proposed is insufficient, but based on discussions with IDEM on December 9, 2002, Mariah will revise its sampling plan to address IDEM's concerns. Mariah proposes to sample MW-1, MW-2, MW-4, MW-5, MW-13, MW-14, MW-18, MW-19. In addition, Mariah will rebuild and sample MW-9 or drill a new well in its approximate location. (See Proposed Groundwater Well Network, attached as Figure 1.)

Given the localized nature of the contamination, the levels of contamination and the groundwater flow and direction, Mariah believes the proposed well network will satisfy the requirements of the VRP.

Brent Dayharsh
December 17, 2002
Page 4

5. The statement on page 32 that Tier II Non-residential cleanup goals have been established for all affected media at the site is not correct. The RWP should include a table listing the individual constituents to be covered by the Certificate of Completion and the Covenant Not to Sue along with their cleanup goals and the target laboratory quantitation limits. If any constituents do not have a VRP Tier II cleanup goal, the corresponding number from the IDEM RISC Technical Guide should be ~~sued~~^{used}. If no RISC number exists, a published number from the EPA or another state may be proposed, or if none can be found, a cleanup number may be calculated from the equation given in Appendix F of the 1996 VRP Resource Guide. If a compound has never been detected at the site at concentrations exceeding the laboratory reporting limit, the detection limit may be proposed as the cleanup goal. Please keep in mind that the laboratory quantitation limit must be equal to or less than the cleanup goal for each compound.

REPLY: Mariah agrees to include a table listing the individual constituents to be covered by the Certification of Completion and the Covenant Not to Sue along with their cleanup goals and target laboratory quantitation limits. August Mack will submit this material by January 31, 2003.

6. Please provide groundwater flow maps for the recent sampling events. The presumed flow direction of northwest to southeast seems to be based on one sampling event performed nearly six years ago.

REPLY: August Mack has redrawn the groundwater flow maps based on the July 26, 2001 sampling event, confirming the southwest direction of groundwater flow. (See Groundwater Elevation Map, attached as Figure 2.)

7. It may be necessary to redevelop the on-site monitoring wells as they were inactive from October, 1996 until July, 2001.

REPLY: August Mack has determined that all the wells included in the sampling plan are active and adequately developed. August Mack will provide IDEM with well depth information by January 31, 2003.

Brent Dayharsh
December 17, 2002
Page 5

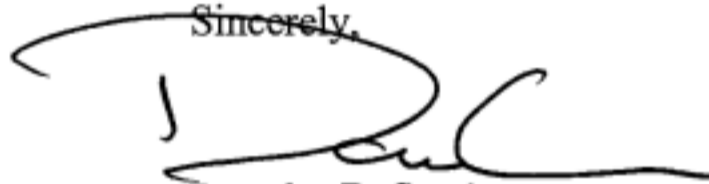
8. The RWP lacks an Executive Summary and site-specific Health and Safety Plan as required Sections 1.0 and 4.3 (pages 29 and 31, respectively) of the VRP Resource Guide. The Executive Summary should address items A through G in Section 1 of the Guide, as applicable.

REPLY: Mariah will provide the additional sections noted in comment 8.

August Mack will submit this material by January 31, 2003.

Mariah appreciated you traveling to its facility last Monday for a face-to-face meeting and hopes that a tour of the facility proved informative as Mariah moves toward closure under the VRP program. Please call me if you have any questions or concerns about Mariah's reply.

Sincerely,

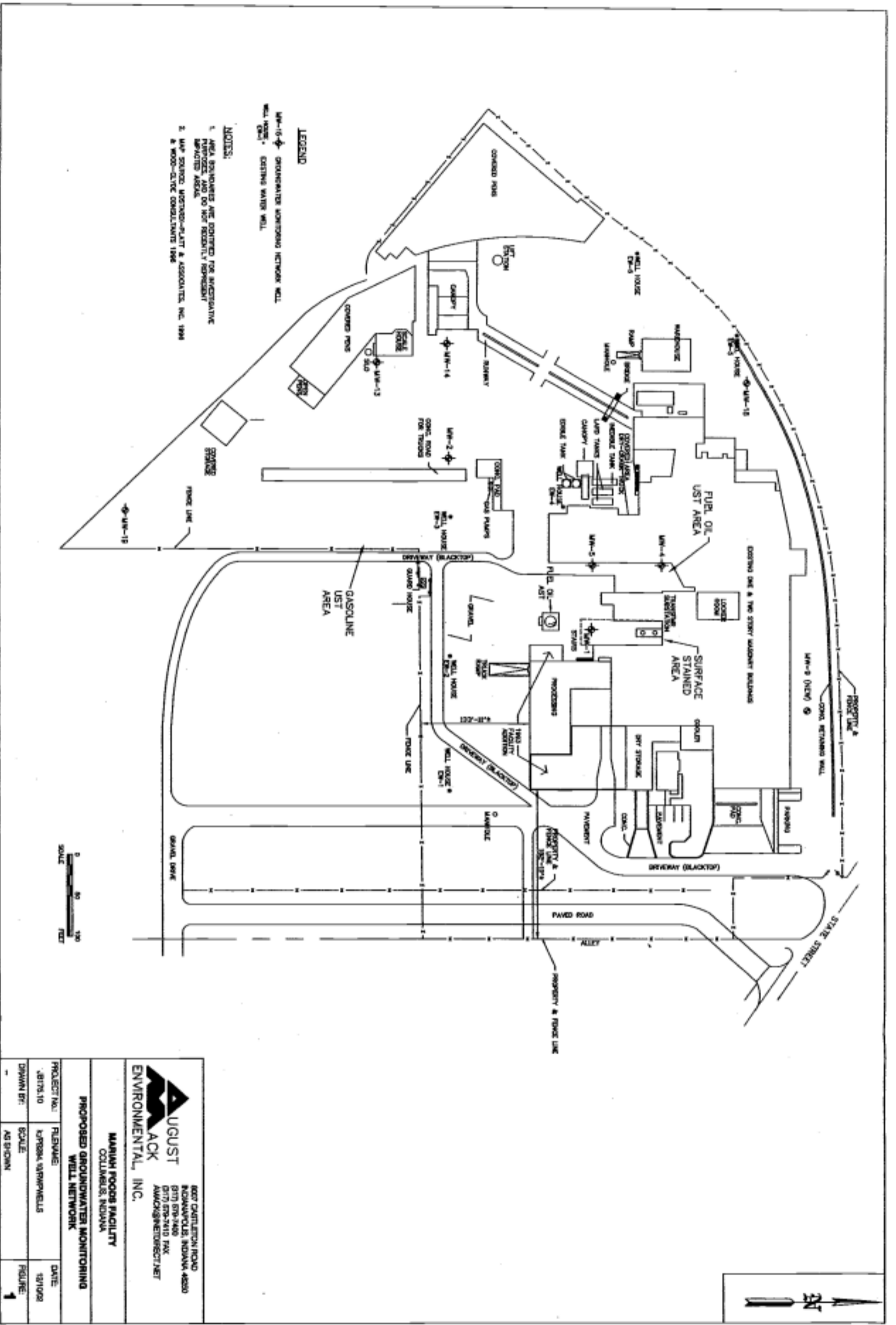
A handwritten signature in black ink, appearing to read 'Douglas B. Sanders', with a large, stylized initial 'D'.

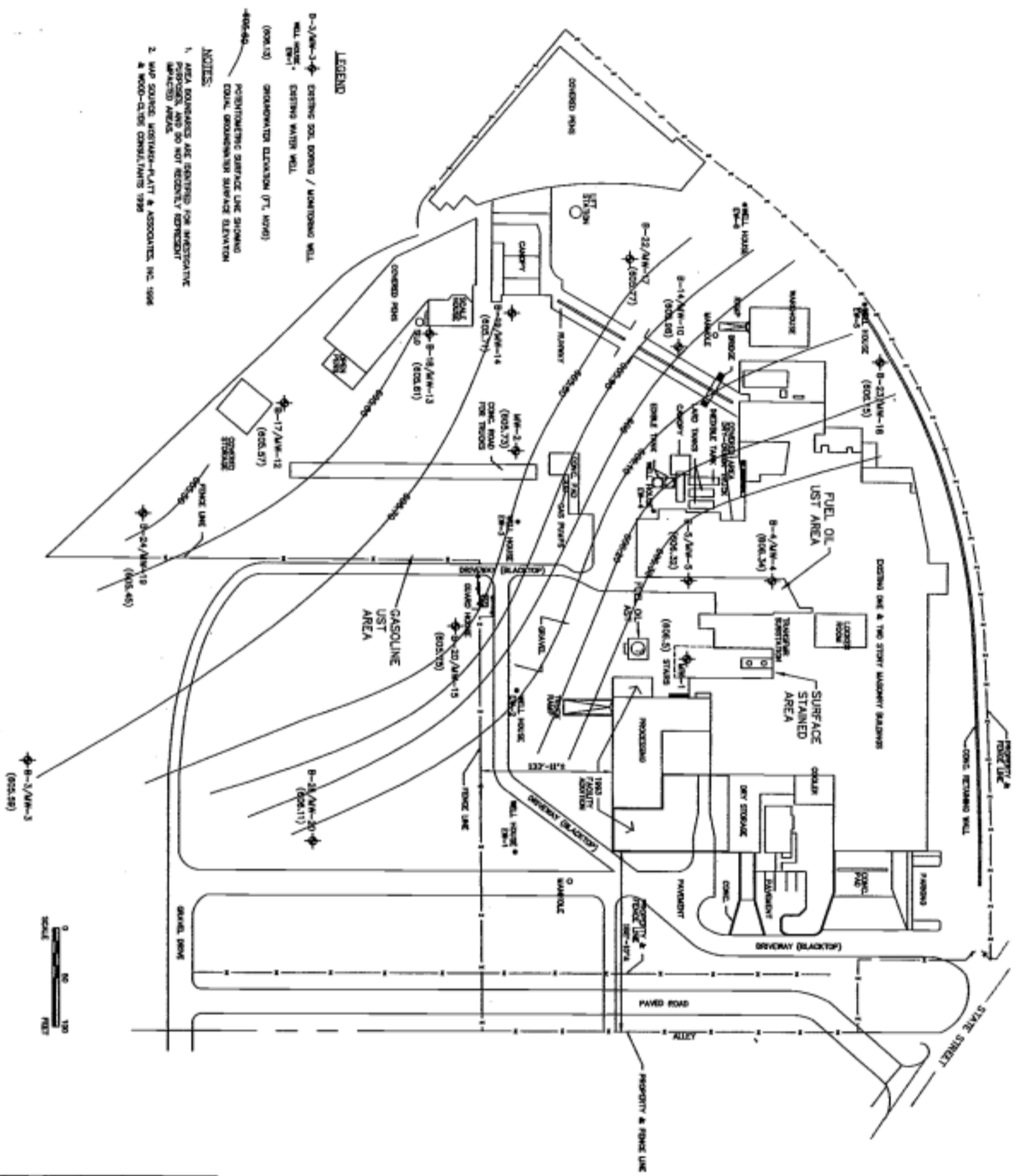
Douglas B. Sanders

DBS/llh

Attachments

cc: Tim DeWitt
Bill Jones





LEGEND

D-1/AW-3 \bullet EXISTING SOIL BORING / MONITORING WELL
 WELL ID#1 \bullet EXISTING WATER WELL
 (802.13) \bullet GROUNDWATER ELEVATION (FT. MVD)

-802.40 --- POTENTIOMETRIC SURFACE LINE SHOWING
 EQUAL GROUNDWATER SURFACE ELEVATION

NOTES:

1. AREA BOUNDARIES ARE SHOWN FOR INVESTIGATIVE PURPOSES, AND DO NOT NECESSARILY REPRESENT IMPACTED AREAS.
 2. MAP SOURCES: WESTMAN-PLATT & ASSOCIATES, INC. 1998 & WOOD-CLIFF CONSULTANTS 1999



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MARIAN FOODS FACILITY COLLAMBUS, INDIANA			
GROUNDWATER ELEVATION MAP JULY 26, 2001			
PROJECT NO.:	FILENAME:	DATE:	
08178.10	MAP0804.10POTPROJ	07/26/01	
DRAWN BY:	SCALE:	FIGURE:	
AG-SHOWN	AS SHOWN	2	