



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 2, 2024

Mr. Derrick Mote
Mote Farms
8531 East 100 South
Union City, Indiana 47390

Re: Summary Report – Focused Environmental Site Investigation
Mote Farms
8531 East 100 South
Union City, Union County
State Cleanup Site #0001154

Dear Mr. Mote:

The Indiana Department of Environmental Management (IDEM) has reviewed the document, *Summary Report – Focused Environmental Site Investigation, Former Mote Farms Agricultural Chemical Storage/Distribution Site*, (ISC) for the State Cleanup Site #0001154 prepared and submitted by IWM Consulting Group, LLC (IWM Consulting) located at 7828 Rockville Road, Indianapolis, Indiana 46214. The ISC was submitted in response to a release(s) of hazardous substances at Mote Farms located at 8531 East 100 South, Union City, Union County (Site). The ISC is available in IDEM’s Virtual File Cabinet (VFC) as document #83637866. 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, the on property drinking water well must be sampled as previously requested. The following comments must be incorporated in the further site investigation work plan (FSI):

Comments

1. The on-Site potable water well is near geoprobe (GP)-3, which contains nitrate and Atrazine above the ground water published levels (GWPL)s. This well was installed through and beneath the till aquitard into the underlying gravel. IDEM requires that the consultant collect a water sample from the on-site potable well to evaluate whether or not



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

We appreciate your input!



the ingestion pathway is incomplete. The consultant must provide the location of the on-Site potable water well on figures and maps. Permanent monitoring wells must be installed to monitor the release-related chemicals (RRC)s concentrations and seasonal data fluctuations. Due to the presence of diesel and gasoline in aboveground storage tanks (AST)s to the south of the ammonia tanks, volatile organic chemicals (VOC)s and polycyclic aromatic hydrocarbon (PAH)s analysis must be included.

2. Based on the results, additional investigation is necessary that completely defines groundwater RRCs to below the ground water published levels (GWPL)s in the source area(s), including up-gradient and down-gradient portions of the contaminant plume. The consultant must use quantitative and qualitative lines of evidence (LOE) including a regression analysis of RRCs extents to develop a path to closure. According to the R2, soil and groundwater analytical summary maps and cross-sections must show the interpreted extents of contaminants defined to applicable screening levels.
3. The report does not propose next steps at this facility based on available data. It should be noted that the investigation was not fully responsive to the approved work plan. In the approval letter (VFC Document #83622047), IDEM requested sampling of the on-Site potable well and analyze for organophosphorus pesticides, chlorinated herbicides, nitrate/nitrite, and ammonia. There is no indication the on-site potable well was sampled.

IDEM must be provided a minimum of two weeks advance notice for field activities. Please submit the FSI work plan to IDEM within 30 days of the date of this letter.

To reduce paper usage, reports are required to be submitted via **State Cleanup's e-Submission Portal (ESP)**. Paper copies are no longer required or accepted; however, paper copies of figures and tables may be requested by the Project Manager.

To request access to the ESP, complete State Agency Form 57103, available on IDEM's website at idem.in.gov/myesubmission. 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 317-691-6370 or by email at kmcdanie@idem.in.gov, or you may call IDEM's toll free number at (800) 451-6027 and ask for Kenneth C. McDaniel.

Sincerely,

Kenneth C. McDaniel

(this document signed electronically)

Kenneth C. McDaniel
State Cleanup Section
Office of Land Quality

ec: IDEM Site #0001154

cc: Mr. Steven P. Sittler, LPG #1137, IWM Consulting Group, 7428 Rockville Road,
Indianapolis, Indiana 46214

Hilary K. Leighty, Associate, Krieg DeVault LLP, One Indiana Square, Suite 2800,
Indianapolis, IN 46204-2079

Matthew D. Neumann, Partner, Krieg DeVault LLP, 12800 N. Meridian Street, Suite 300,
Carmel, IN 46032

Union County Health Department, Number ½, 6 West South Street, Liberty, Indiana 47353

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.