

M-0001

**Quality Environmental Professionals, Inc.**

September 29, 2010

Ms. Amy Seymour
Indiana Department of Environmental Management
Office of Land Quality
Leaking Underground Storage Tank Section
100 North Senate Avenue, Room 1101
Indianapolis, Indiana 46204

**Re: Request for No Further Action
Former Union Street Sunoco
1126 South Union Street
Mishawaka, Indiana
LUST # 199401501
FID # 9672**

OCT 12 2010

Dear Ms. Seymour:

Quality Environmental Professionals, Inc. (Qepi) is pleased to submit this letter report requesting No Further Action (NFA) status at the above-referenced facility. This NFA request letter is being submitted in response to the Indiana Department of Environmental Management's (IDEM) *Site Characterization Approval and Request for Closure Strategy* letter dated August 26, 2010. Based on the results of Qepi's further site investigation as well as the results of additional groundwater monitoring conducted at the site, Qepi believes that impacts encountered at the site have been delineated and exposure pathways are limited. Based on this and future redevelopment plans for the site calling for realignment of the adjacent roadways to encompass the site, Qepi is requesting an NFA for the site. A copy of the IDEM letter is included as Attachment A.

Background

The site was historically used as a gasoline service station and automotive repair shop. The site ceased operation as a gasoline service station in 1995 and continued operation as an automotive repair shop until 2005, when it was vacated. The site was originally developed for use as a service station in 1932. Prior to 1932 the site was undeveloped. The station building was demolished in late 2007. The site is currently vacant and used for green space.

The site historically operated five steel USTs, including three 3,000 gallon tanks and two 1,000 gallon tanks, which were registered on May 2, 1986 to J & K Oil Company of Elkhart, Indiana. Four of the tanks were installed in 1971 and one of the tanks was installed in 1976. The three 3,000 gallon USTs were stationed on the southern portion of the site in one tank pit. One 1,000 gallon UST was stationed adjacent to the building to the south and the other 1,000 gallon UST was stationed adjacent to the building to the north. The USTs contained gasoline. The site also operated an aboveground storage tank containing waste oil, staged on the eastern edge of the former site building.

Qepi completed a *Phase I Environmental Site Assessment* (Phase I ESA) in March 2007. Findings from the Phase I ESA confirmed a potential concern for subsurface impacts associated



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with the former USTs and pump island area.

From May 2007 to September 2009, Qepi advanced a total of 26 soil borings and installed 6 groundwater monitoring wells at the site. The soil borings were advanced throughout the site and offsite to the north, south and west to both horizontally and vertically delineate petroleum impacts encountered at the site.

Based upon the results of these previously conducted investigations, impacts to soil exceeding IDEM Risk Integrated System of Closure (RISC) Residential Default Closure Levels (RDCLs) were encountered at two soil borings at the site. These two soil borings (SB-11 and SB-21) exhibited slightly elevated concentrations of total petroleum hydrocarbons (TPH) extended range organics (ERO) and gasoline range organics (GRO), respectively. Impacts exceeding laboratory detection limits were not encountered in any of the soil samples collected for vertical delineation purposes.

Based on the results of groundwater samples collected, both from soil borings and from the groundwater monitoring well network installed, impacts to groundwater slightly exceeding IDEM RISC RDCLs were encountered in groundwater monitoring well MW-1, located approximately in the west-central portion of the site. Impacts exceeding IDEM RISC Industrial Default Closure Levels (IDCLs) were not encountered. Impacts to groundwater exceeding laboratory detection limits were not encountered in the soil borings or monitoring wells sampled in the eastern portion of the subject property.

Furthermore, based on the previously conducted investigations, it does not appear that impacts to soil or groundwater are present on the properties to the north, south and west of the subject property. Based on the total of investigative activities conducted, it is unlikely that impacts present at the site have migrated offsite on to the neighboring properties. A site map depicting the locations of soil borings and groundwater monitoring wells has been provided as Figure 1. Historic soil analytical results are included as Table 1 and historic groundwater analytical results are included as Table 2.

Identification of Susceptible Areas

Qepi has evaluated possible susceptible areas as defined by the IDEM RISC Technical Guide including ecological impacts, Wellhead Protection Areas, and the proximity of the site to surface water, private and public potable well supplies, schools and childcare facilities.

There were no indicators of wetlands observed at the site. A United States Department of the Interior, Fish & Wildlife Service, and National Wetlands Inventory Map was reviewed to evaluate the existence of inventoried potential wetlands at the site. The wetlands map did not identify designated wetlands on the site. The nearest designated potential wetlands is located approximately three-quarter mile north of the site adjacent to the Saint Joseph River. The site is not known to be in an ecologically susceptible area.

The site and surrounding area is provided with potable water by the City of Mishawaka. The site is not located in a wellhead protection area. No residences with basements are located downgradient of the site. No hospitals or childcare facilities were noted within 1,000 feet of the



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site.

There is only a limited potential to impact nearby receptors based on the following information:

- Impacts are due to a historical release.
- The majority of the impacted groundwater is located approximately 12 feet below ground surface (bgs). Impacts have been delineated and are locally concentrated near the west-center of the site. The site is covered with grassed areas.
- The nearest water supply well is located approximately 0.20 miles south of the site. This well is upgradient of the site. The site and surrounding area are connected to the municipal water supply. A figure depicting the locations of the nearest water supply wells is included as Figure 2.
- Redevelopment activities planned at the site will include the expansion of the roadway and the nearby intersection to encompass the entire site. The site will be graded and capped with asphalt for the roadway realignment. A figure depicting the tentative roadway realignment plan is included as Figure 3.

Exposure Pathway Assessment

The site is currently grassed and not in use; however future redevelopment plans have the site incorporated as part of the roadway extension of South Union Street and East 13th Street. Any remaining sections of the site will be capped with asphalt to provide overflow parking for the neighboring businesses. This will further prevent exposure through direct contact, ingestion and inhalation. A summary is provided below.

Impact Source	Exposure Pathway	Potential for Exposure	Complete Pathway	Comments
Soil	Direct Contact	No	Limited	Limited – potential direct contact exposure during roadway construction activities, site will be covered and paved after construction
	Migration to Groundwater	Yes	Limited	Excluded – grassed area with limited access with future asphalt capped
	Inhalation	No	Incomplete	Excluded – No buildings onsite
Groundwater	Ingestion	No	Incomplete	Excluded – municipal water supply
	Direct Contact	No	Limited	Excluded – municipal water supply
	Inhalation	No	Limited	Excluded – municipal water supply



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Only limited direct contact with impacted soils is present during the roadway construction at the site; however soil impacts encountered are present below IDEM RISC Residential Direct Contact Levels. The direct contact with soil/groundwater, ingestion and inhalation from soil/groundwater pathways can be eliminated from potential exposure through the use of an Industrial Deed Restriction. This notice restricts the land-use of this site to commercial/industrial uses limiting the use and contact of any on-site soil and groundwater. Due to the limited extent of impacts onsite and the future redevelopment plans of the site; Qepi is requesting NFA status be granted without a formal deed restriction in place. The presence of a roadway along with a paved, capped asphalt parking area restricts the land use of the property and limits its use and contact.

Conclusions

Based on the results of the site investigation activities, only limited impacts slightly exceeding IDEM RISC RDCLs have been encountered at the site. These impacts are located centrally at the site, and have been horizontally and vertically delineated. Impacts do not appear to be migrating offsite in any direction.

Due to the historic nature of the release at the site, the limited receptors and the limited exposure pathways present, it is unlikely that these impacts pose a risk to human health and/or the environment. Based on future redevelopment at the site, any impacts present will be further contained by an asphalt cap or a roadway. Due to these factors, Qepi is requesting No Further Action status under the IDEM RISC guidance.

If you have any questions regarding this closure request, please contact me at (574) 234-1475. Qepi is looking forward to working in a cooperative effort with IDEM to efficiently bring a closure status to this LUST Incident. Thank you for your consideration in this matter.

Sincerely,

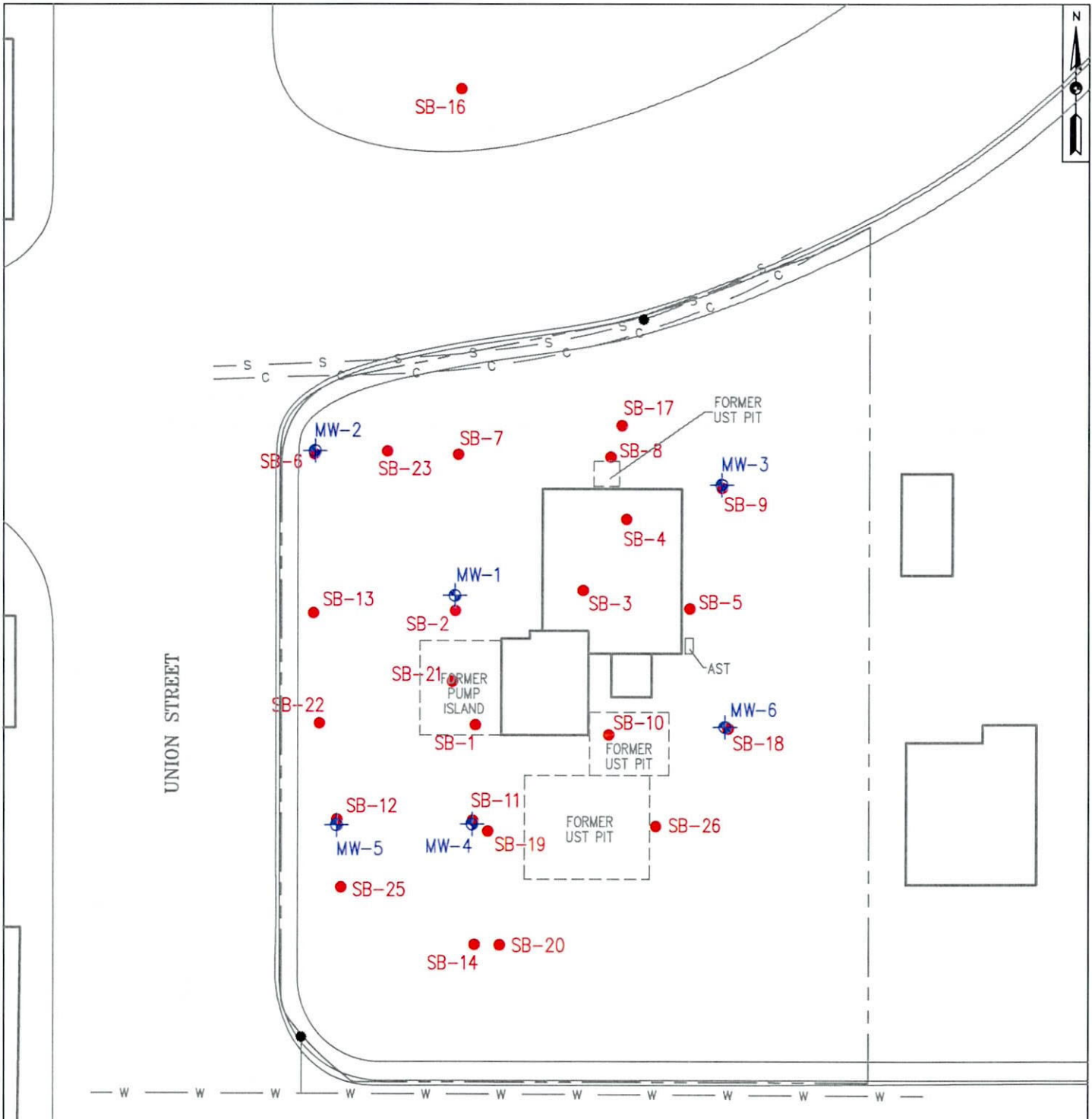
A handwritten signature in black ink, appearing to read "Nivas R. Vijay".

Nivas R. Vijay, CHMM
Project Manager

A handwritten signature in black ink, appearing to read "Brent A. Dayharsh".

Brent A. Dayharsh, LPG
Director of Technical Operations

Figures



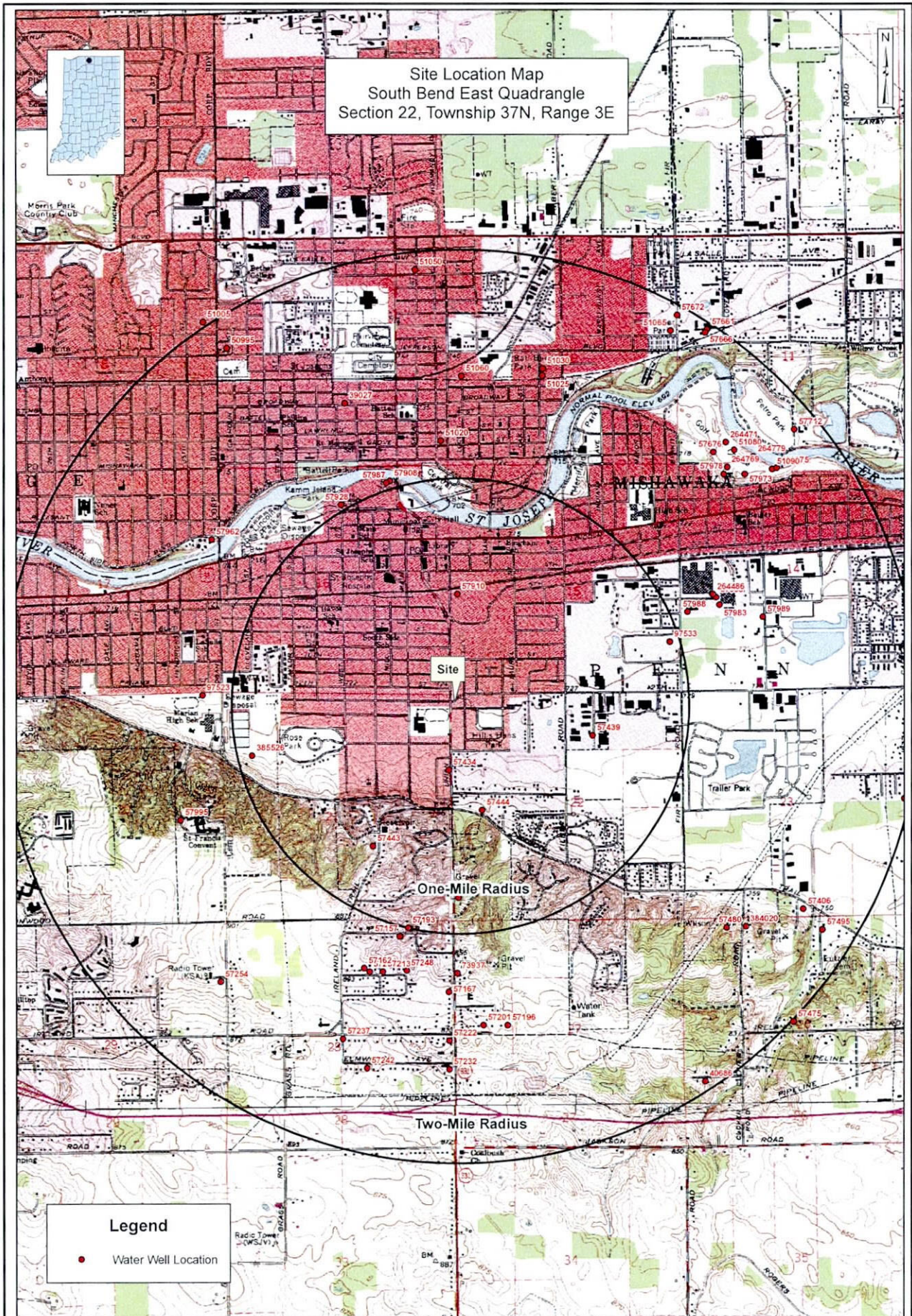
LEGEND

- SOIL BORING
- ⊕ MONITORING WELL
- W — WATER LINE
- S — SEWER LINE
- C — COMMUNICATION LINE



FIGURE 1
SITE MAP
FORMER UNION STREET SUNOCO
1126 SOUTH UNION STREET
MISHAWAKA, INDIANA

PROJECT NO. 07-01-05	DATE 9/24/10
DRAWN BY CWH	SCALE 1"=30'
CHECKED BY NRV	SHEET 1



Base Map: 2005 Statewide Natural Color Aerial Photo

Qepi QUALITY ENVIRONMENTAL PROFESSIONALS, INC.
 1011 South Franklin Road
 Indianapolis, Indiana 46249

FIGURE 1
 WELL LOCATION MAP
 FORMER UNION STREET SUNOCO
 1126 SOUTH UNION STREET
 MISHAWAKA, INDIANA

Project Number	Date
07-01-005	9/24/10
Drawn By	Scale
CWH	1"=2000'
Checked By	Sheet
NV	1

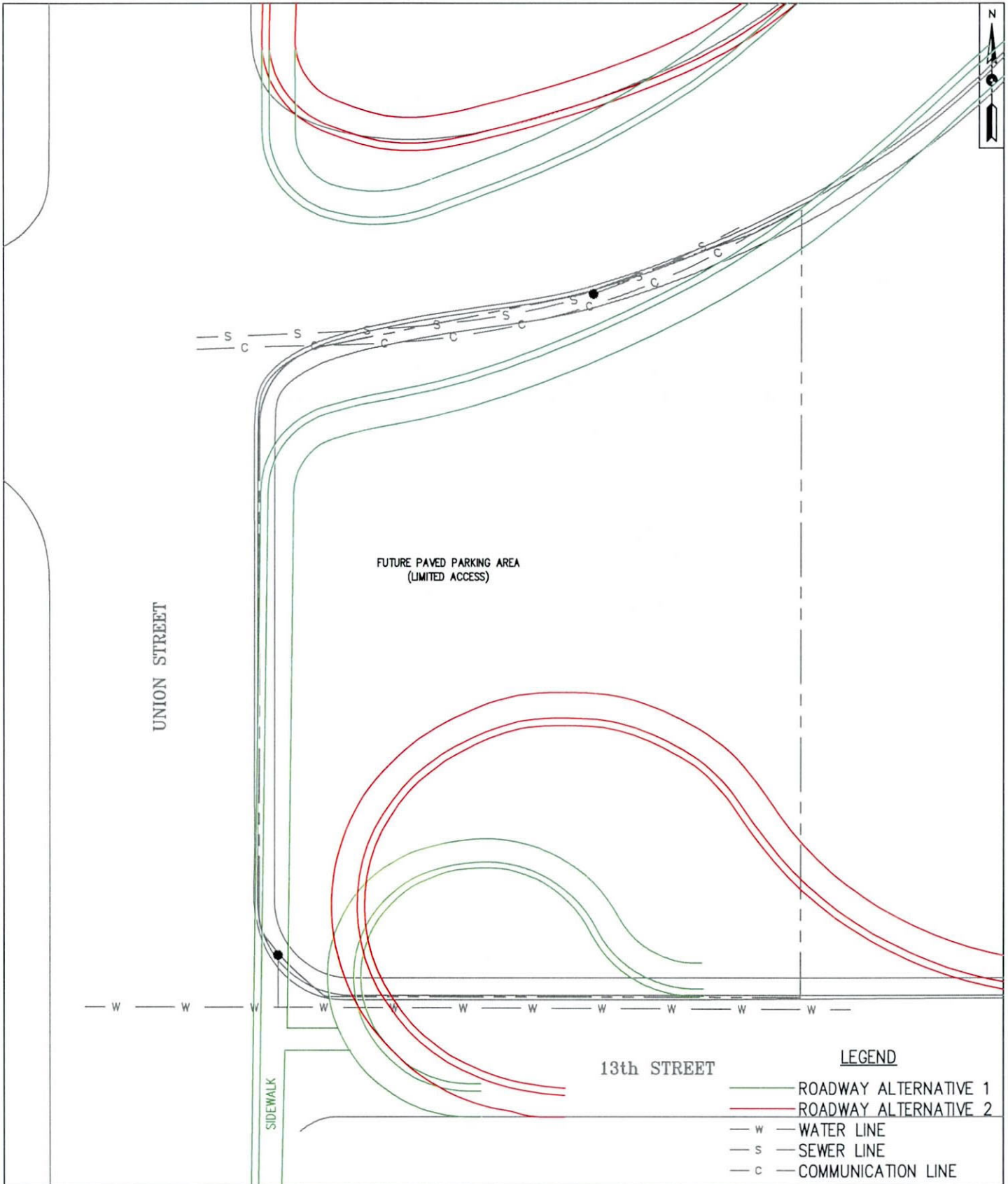


FIGURE 3
PROPOSED ROADWAY
FORMER UNION STREET SUNOCO
1126 SOUTH UNION STREET
MISHAWAKA, INDIANA

PROJECT NO.	DATE
07-01-05	9/24/10
DRAWN BY	SCALE
CWH	1"=30'
CHECKED BY	SHEET
NRV	1

Tables

Table 1
Soil Sample Analytical Results
Former Union Street Sunoco
1126 South Union Street
Mishawaka, Indiana

Sample I.D.	Date	Sample Depth (ft)	TPH Gasoline Range	TPH Extended Range	Benzene	Toluene	Ethylbenzene	Total Xylene	MTBE	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a,h)anthracene	Indeno(1,2,3-cd)pyrene	Naphthalene
			(ppm)	(ppm)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)
SB-1	4/13/2007	2-4	<1.1	NA	<6	<6	<6	<11	<6	NS	NS	NS	NS	NS	NS	NS	NS
SB-2	4/13/2007	4-6	<1.1	NA	<6	<6	83.4	138	<6	NS	NS	NS	NS	NS	NS	NS	NS
SB-3	4/13/2007	8-10	<1.0	122	<5	<5	<5	15	<5	NS	NS	NS	NS	NS	NS	NS	NS
SB-4	4/13/2007	6-8	2.33	53	<7	8.83	271	479	<7	NS	NS	NS	NS	NS	NS	NS	NS
SB-5	4/13/2007	4-6	<1.9	<37	<9	<9	<9	<19	<9	NS	NS	NS	NS	NS	NS	NS	NS
SB-6	2/28/2008	8'-10'	<20	46	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-8	2/28/2008	8'-10'	<20	26	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-10	2/29/2008	8'-10'	<20	53	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-11	2/28/2008	6'-8'	<20	595	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-15	6/18/2008	10'-12'	<16.3	<22	<5	<5	<5	<11	<5	NS	NS	NS	NS	NS	NS	NS	NS
SB-16	6/18/2008	10'-12'	<15.6	<21	<5	<5	<5	<10	<5	NS	NS	NS	NS	NS	NS	NS	NS
SB-17	8/26/2009	8'-10'	<15.6	<21	<5	<5	<5	<10	<5	<34	<34	<34	<34	<34	<34	<34	<34
		14'-16'	<16.5	<22	<5	<5	<5	<11	<5	<36	<36	<36	<36	<36	<36	<36	<36
SB-18	8/26/2009	10'-12'	<15.5	<21	<5	<5	<5	<10	<5	<34	<34	<34	<34	<34	<34	<34	<34
		14'-16'	<16.7	<22	<6	<6	<6	<11	<6	<37	<37	<37	<37	<37	<37	<37	<37
SB-19	8/26/2009	8'-10'	<15.8	<21	<5	<5	<5	<11	<5	<35	<35	<35	<35	<35	<35	<35	106
		16'-18'	<16.5	<22	<5	<5	<5	<11	<5	<36	<36	<36	<36	<36	<36	<36	<36
SB-20	8/27/2009	10'-12'	<16.9	<22	<6	<6	<6	<11	<6	<37	<37	<37	<37	<37	<37	<37	<37
		14'-16'	<17.9	<24	<6	<6	<6	<12	<6	<39	<39	<39	<39	<39	<39	<39	<39
SB-21	8/26/2009	8'-10'	147	62	<34	<269	1,010	3,320	<180	<35	<35	<35	<35	<35	<35	<35	120
		16'-18'	<17.0	<23	<6	<6	<6	<11	<6	<38	<38	<38	<38	<38	<38	<38	<38
SB-22	8/26/2009	10'-12'	<15.6	<21	<5	<5	<5	<10	<5	<34	<34	<34	<34	<34	<34	<34	121
		16'-18'	<17.4	<23	<6	<6	<6	<12	<6	<38	<38	<38	<38	<38	<38	<38	<38
SB-23	8/26/2009	10'-12'	115	23	<34	<258	<258	<516	<180	<34	<34	<34	<34	<34	<34	<34	237
		16'-18'	<17.0	<23	<6	<6	<6	<11	<6	<38	<38	<38	<38	<38	<38	<38	<38
SB-24	8/27/2009	8'-10'	<16.3	<22	<5	<5	<5	<11	<5	<36	<36	<36	<36	<36	<36	<36	<36
		14'-16'	<15.6	<21	<5	<5	<5	<10	<5	<34	<34	<34	<34	<34	<34	<34	<34
SB-25	8/27/2009	8'-10'	<15.6	<21	<5	<5	<5	<10	<5	<34	<34	<34	<34	<34	<34	<34	54
		14'-16'	<17.2	<23	<6	<6	<6	<11	<6	<38	<38	<38	<38	<38	<38	<38	<38
SB-26	8/27/2009	8'-10'	<17	39	<6	<6	<6	<11	<6	<38	<38	<38	<38	<38	<38	<38	<38
		14'-16'	<16.9	<22	<6	<6	<6	<11	<6	<37	<37	<37	<37	<37	<37	<37	<37
RISC Default Residential			120	230	34	13,000	12,000	170,000	180	5,000	500	5,000	39,000	25,000	500	3,100	700
RISC Default Industrial			1,500	2,300	350	160,000	240,000	170,000	3,200	15,000	1,500	15,000	39,000	25,000	1,500	3,100	170,000

Laboratory analysis by ENVision Laboratories, Inc. Indianapolis, Indiana
Results in bold exceed IDEM RISC Default Residential Cleanup Objectives
Results Shaded exceed IDEM RISC Default Industrial Cleanup Objectives
Note TPH (GRO/ERO) RISC Default Cleanup Objectives Amended June 29, 2009
NS = Parameter not analyzed
< = result is less than laboratory detection limit
ppb = parts per billion
ppm = parts per million

Table 2
Groundwater Analytical Results
Former Union Street Swooco
1124 South Union Street
Mishawaka, Indiana

Sample I.D.	Date	Depth to Water	Groundwater Elevation	TPH Gasoline Range	TPH Extended Range	Benzene	Toluene	Ethylbenzene	Total Xylene	MTBE	Naphthalene (0021/0210)	Benz(a)anthracene	Benz(e)pyrene	Benz(b)fluoranthene	Benz(k)fluoranthene	Chrysene	Dibenz(a,h)anthracene	Indeno(1,2,3-cd)pyrene	Naphthalene (0705/10)	n-Propylbenzene	1,2,4-Trimethylbenzene	1,2,5-Trimethylbenzene
				(ppm)	(ppm)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)
SB-1	4/13/2007	-	-	1,510	NA	6.84	<5	53.2	192	<5	NA	NS	NS	NS	NS	NS	NS	NS	NS	NA	NA	NA
SB-2	4/13/2007	-	-	13,400	NA	47.1	<50	1,130	2,480	<40	NA	NS	NS	NS	NS	NS	NS	NS	NS	NA	NA	NA
SB-3	4/13/2007	-	-	1,830	2,410	<5	<5	40.2	121	<5	53.8	NS	NS	NS	NS	NS	NS	NS	NS	54	171	134
SB-4	4/13/2007	-	-	<100	434	<5	<5	<5	5.21	<5	2.0	NS	NS	NS	NS	NS	NS	NS	NS	<5	8.32	<5
SB-5	4/13/2007	-	-	<100	<100	<5	<5	<5	<10	<5	<5	NS	NS	NS	NS	NS	NS	NS	NS	<5	<5	<5
SB-7	2/28/2008	-	-	474	1,100	<5	<5	82.2	248	<5	69	NS	NS	NS	NS	NS	NS	NS	NS	35	209	56.9
SB-8	2/28/2008	-	-	1,520	1,820	<5	<5	180	301	<5	231	NS	NS	NS	NS	NS	NS	NS	NS	73.8	392	140
SB-10	2/29/2008	-	-	<220	1,420	<5	<5	<5	<10	<5	<5	NS	NS	NS	NS	NS	NS	NS	NS	<5	<5	<5
SB-13	2/28/2008	-	-	<220	<100	<5	<5	<5	5.9	<5	<5	NS	NS	NS	NS	NS	NS	NS	NS	<5	6.89	<5
SB-14	2/29/2008	-	-	<220	660	<5	<5	<5	<10	<5	<5	NS	NS	NS	NS	NS	NS	NS	NS	9.3	32.8	13.2
MW-1	3/25/2008	10.87	88.71	8,450	8,900	18.6	<50	877	2,970	<40	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TOC = 99.58	9/4/2009	10.94	88.64	15,300	12,100	<5	<50	872	2,270	<40	173	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	98.1	NS	NS	NS
	3/31/2010	11.15	88.43	14,200	27,300	14.5	<50	767	2,020	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	324	NS	NS	NS
SB-6/MW-2	3/25/2008	11.04	88.48	3,690	1,700	<5	<50	37.6	137	<40	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TOC = 99.52	9/4/2009	10.93	88.59	626	133	<5	<5	12.6	24.7	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	1.41	NS	NS	NS
	3/31/2010	11.14	88.38	<220	456	<5	<5	<5	<10	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	1.8	NS	NS	NS
SB-9/MW-3	3/25/2008	10.86	88.87	<220	<100	<5	<5	<5	<10	<5	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TOC = 99.73	9/4/2009	11.12	88.61	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
	3/31/2010	11.32	88.41	<220	<100	<5	<5	<5	<10	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
SB-11/MW-4	3/25/2008	11.02	88.76	2,750	4,200	<5	<50	158	1,230	<40	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TOC = 99.78	9/4/2009	11.10	88.68	1,500	998	<5	<50	59.2	126	<40	28.6	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	21.2	NS	NS	NS
	3/31/2010	11.30	88.48	1,010	2,360	<5	<5	46.5	101	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	14.9	NS	NS	NS
SB-12/MW-5	3/25/2008	10.44	88.77	3,830	2,800	7.74	<5	65.0	300	<5	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TOC = 99.21	9/4/2009	10.52	88.69	2,570	1,640	<5	<5	44.9	38.6	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	6.24	NS	NS	NS
	3/31/2010	10.72	88.49	1,790	5,310	<5	<5	36.2	39.8	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	27.7	NS	NS	NS
SB-15	6/18/2008	-	-	<220	<100	<5	<5	<5	<10	<5	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-16	6/18/2008	-	-	<220	<100	<5	<5	<5	<10	<5	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-17	8/26/2009	-	-	NS	NS	NS	NS	NS	NS	NS	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
SB-18/MW-6	9/4/2009	10.73	88.71	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
TOC = 99.44	3/31/2010	10.93	88.51	<220	<100	<5	<5	<5	<10	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
SB-20	8/27/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
SB-21	8/26/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
SB-22	8/26/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
SB-24	8/27/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
SB-25	8/27/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
SB-26	8/27/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS
RISC Default Residential Cleanup Objective				-	-	5	1,000	700	10,000	40	8.3	1.2	0.2	1.2	0.8	1.6	0.12	0.022	8.3	310	16.0	16.0
RISC Default Industrial Cleanup Objective				-	-	52	20,000	10,000	20,000	870	2,000	3.9	0.39	1.5	0.8	1.6	0.12	0.022	2,000	4,100	5,100	5,100

Laboratory analysis by ENVIscion Laboratories, Inc. Indianapolis, Indiana
 Results in bold exceed IDEM RISC Default Residential Cleanup Goals
 Results Shaded exceed IDEM RISC Default Industrial Cleanup Objectives
 Note TPH (GRO/ERO) RISC Default Cleanup Objectives Amended June 29, 2009; Objectives discontinued June 17, 2010
 NS = Parameter not analyzed
 < = result is less than laboratory detection limit
 ppb = parts per billion
 ppm = parts per million

Attachment A


INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

August 26, 2010

VIA CERTIFIED MAIL

Ms. Lory Timmer
Department of Redevelopment
City of Mishawaka
600 East Third Street
Mishawaka, IN 46544
574-258-1668

Re: **Site Characterization Approval and
Request for Closure Strategy**
Former Union Street Sunoco
1126 South Union Street
Mishawaka, IN 46544
FID# 9672
LUST# 199401501

Dear Ms. Timmer:

The Indiana Department of Environmental Management (IDEM) reviewed your file pertaining to a release of petroleum product for the former Union Street Sunoco located at 1126 South Union Street. The following documents were reviewed:

- Further Site Investigation Amendment Report prepared by Quality Environmental Professionals, Inc. (QEPI), dated October 19, 2009
- FSI Amendment Report-Level IV QA/QC Data prepared by QEPI, dated April 30, 2010

In accordance with, IC 13-23-13, 329 IAC 9-5-5.1, and 329 IAC 9-5-6, your site characterization is approved. IDEM staff determined that the release may be eligible for a no further action. In order for IDEM to determine if the release is eligible, IDEM requests the following information supporting closure:

- Brief summary of corrective action steps completed to date
- Overview of current site conditions including nature and extent of contaminants and potential for contaminant migration, e.g. plume stability and preferential pathways
- Brief discussion of actual or potential exposure to contaminants

Ms. Lory Timmer
FID # 9672 (Incident # 199401501)

August 26, 2010
Page 2 of 2

- Additional site-specific considerations supporting a conclusion that site risks have been reduced to acceptable levels or completed or potential exposures pathways are controlled
- Additional exposure control mechanisms proposed to manage risk and control exposure pathways, such as:
 - Environmental restrictive covenants (ERCs) including activity restrictions and engineering controls (Include draft ERCs)
 - Environmental restrictive ordinance – (Include ordinance)

Please refer to the enclosure titled "Office of Land Quality Document Submittal Guidelines" for current document submittal requirements. The guidelines may also be found online at: http://www.in.gov/idem/files/lust_document_submittal_guidance.doc.

Please submit all items to the following address:

67-18
Indiana Department of Environmental Management
Office of Land Quality
Leaking Underground Storage Tank Section
100 N. Senate Ave., Room 1101
Indianapolis, IN 46204-2251

If you have any questions, please contact me at 317/234-0982 or toll free from within Indiana at 800/451-6027. I can also be reached via email at: aseymour@idem.in.gov.

Sincerely,



Amy L. Seymour
Environmental Project Manager
Leaking Underground Storage Tank Section
Office of Land Quality

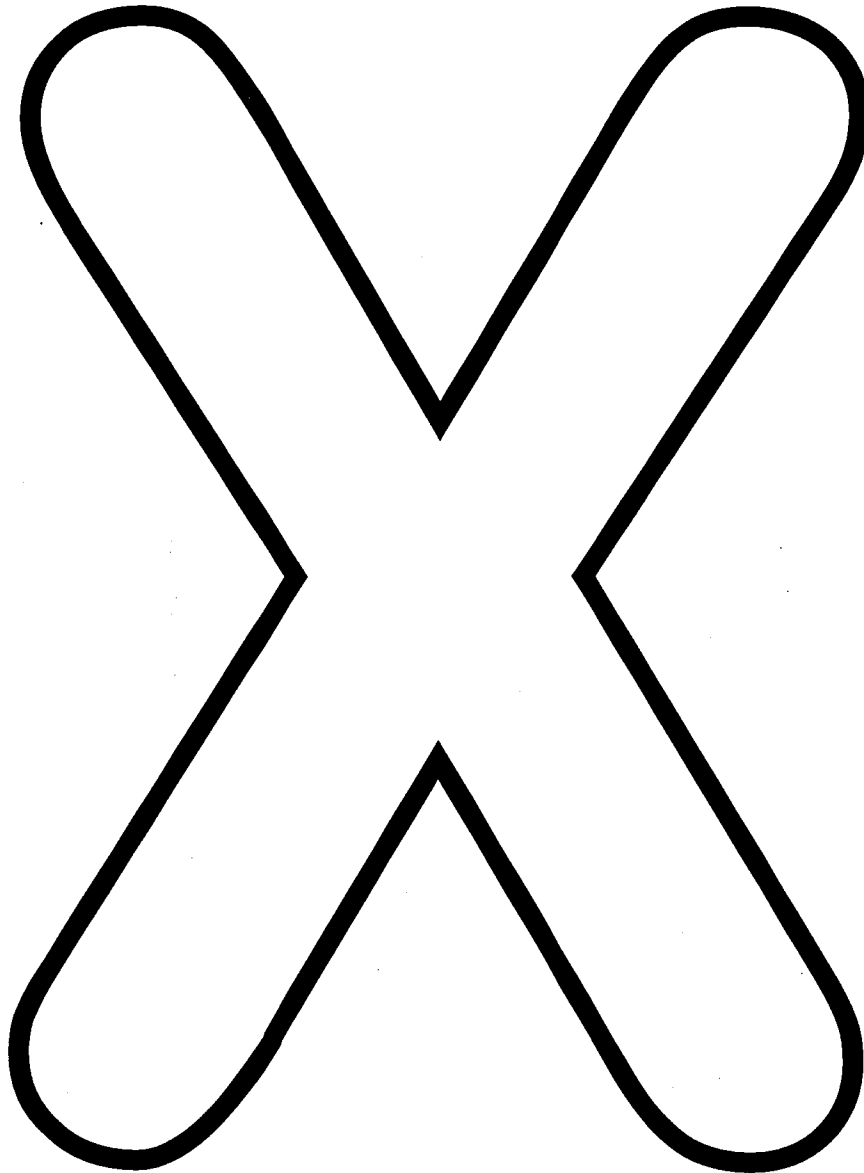
ecopy: IDEM File
St. Joseph County Health Department
Mr. Nivas Vijay, QEPI
Mr. David Lawrence, IDEM Northern Regional Office

If you would like to provide IDEM with feedback on our job performance, please go to <http://www.in.gov/idem/5681.htm> and complete our "Remediation Program Customer Satisfaction Survey". Your responses are anonymous and we appreciate the feedback on what we are doing well, and what we need to improve.

Multi-Page Separator Sheet

NOTE: This separator page has been inserted to designate the beginning of a group of pages originally attached or grouped by staple, paper clip, folder, etc. This page is not part of the original document.

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Quality Environmental Professionals, Inc.

September 29, 2010

Ms. Amy Seymour
Indiana Department of Environmental Management
Office of Land Quality
Leaking Underground Storage Tank Section
100 North Senate Avenue, Room 1101
Indianapolis, Indiana 46204

**Re: Request for No Further Action
Former Union Street Sunoco
1126 South Union Street
Mishawaka, Indiana
LUST # 199401501
FID # 9672**

Dear Ms. Seymour:

Quality Environmental Professionals, Inc. (Qepi) is pleased to submit this letter report requesting No Further Action (NFA) status at the above-referenced facility. This NFA request letter is being submitted in response to the Indiana Department of Environmental Management's (IDEM) *Site Characterization Approval and Request for Closure Strategy* letter dated August 26, 2010. Based on the results of Qepi's further site investigation as well as the results of additional groundwater monitoring conducted at the site, Qepi believes that impacts encountered at the site have been delineated and exposure pathways are limited. Based on this and future redevelopment plans for the site calling for realignment of the adjacent roadways to encompass the site, Qepi is requesting an NFA for the site. A copy of the IDEM letter is included as Attachment A.

Background

The site was historically used as a gasoline service station and automotive repair shop. The site ceased operation as a gasoline service station in 1995 and continued operation as an automotive repair shop until 2005, when it was vacated. The site was originally developed for use as a service station in 1932. Prior to 1932 the site was undeveloped. The station building was demolished in late 2007. The site is currently vacant and used for green space.

The site historically operated five steel USTs, including three 3,000 gallon tanks and two 1,000 gallon tanks, which were registered on May 2, 1986 to J & K Oil Company of Elkhart, Indiana. Four of the tanks were installed in 1971 and one of the tanks was installed in 1976. The three 3,000 gallon USTs were stationed on the southern portion of the site in one tank pit. One 1,000 gallon UST was stationed adjacent to the building to the south and the other 1,000 gallon UST was stationed adjacent to the building to the north. The USTs contained gasoline. The site also operated an aboveground storage tank containing waste oil, staged on the eastern edge of the former site building.

Qepi completed a *Phase I Environmental Site Assessment* (Phase I ESA) in March 2007. Findings from the Phase I ESA confirmed a potential concern for subsurface impacts associated



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Indiana Department of Environmental Management
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Former Union Street Sunoco, Mishawaka, Indiana
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with the former USTs and pump island area.

From May 2007 to September 2009, Qepi advanced a total of 26 soil borings and installed 6 groundwater monitoring wells at the site. The soil borings were advanced throughout the site and offsite to the north, south and west to both horizontally and vertically delineate petroleum impacts encountered at the site.

Based upon the results of these previously conducted investigations, impacts to soil exceeding IDEM Risk Integrated System of Closure (RISC) Residential Default Closure Levels (RDCLs) were encountered at two soil borings at the site. These two soil borings (SB-11 and SB-21) exhibited slightly elevated concentrations of total petroleum hydrocarbons (TPH) extended range organics (ERO) and gasoline range organics (GRO), respectively. Impacts exceeding laboratory detection limits were not encountered in any of the soil samples collected for vertical delineation purposes.

Based on the results of groundwater samples collected, both from soil borings and from the groundwater monitoring well network installed, impacts to groundwater slightly exceeding IDEM RISC RDCLs were encountered in groundwater monitoring well MW-1, located approximately in the west-central portion of the site. Impacts exceeding IDEM RISC Industrial Default Closure Levels (IDCLs) were not encountered. Impacts to groundwater exceeding laboratory detection limits were not encountered in the soil borings or monitoring wells sampled in the eastern portion of the subject property.

Furthermore, based on the previously conducted investigations, it does not appear that impacts to soil or groundwater are present on the properties to the north, south and west of the subject property. Based on the total of investigative activities conducted, it is unlikely that impacts present at the site have migrated offsite on to the neighboring properties. A site map depicting the locations of soil borings and groundwater monitoring wells has been provided as Figure 1. Historic soil analytical results are included as Table 1 and historic groundwater analytical results are included as Table 2.

Identification of Susceptible Areas

Qepi has evaluated possible susceptible areas as defined by the IDEM RISC Technical Guide including ecological impacts, Wellhead Protection Areas, and the proximity of the site to surface water, private and public potable well supplies, schools and childcare facilities.

There were no indicators of wetlands observed at the site. A United States Department of the Interior, Fish & Wildlife Service, and National Wetlands Inventory Map was reviewed to evaluate the existence of inventoried potential wetlands at the site. The wetlands map did not identify designated wetlands on the site. The nearest designated potential wetlands is located approximately three-quarter mile north of the site adjacent to the Saint Joseph River. The site is not known to be in an ecologically susceptible area.

The site and surrounding area is provided with potable water by the City of Mishawaka. The site is not located in a wellhead protection area. No residences with basements are located downgradient of the site. No hospitals or childcare facilities were noted within 1,000 feet of the



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 Indiana Department of Environmental Management
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 Former Union Street Sunoco, Mishawaka, Indiana
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site.

There is only a limited potential to impact nearby receptors based on the following information:

- Impacts are due to a historical release.
- The majority of the impacted groundwater is located approximately 12 feet below ground surface (bgs). Impacts have been delineated and are locally concentrated near the west-center of the site. The site is covered with grassed areas.
- The nearest water supply well is located approximately 0.20 miles south of the site. This well is upgradient of the site. The site and surrounding area are connected to the municipal water supply. A figure depicting the locations of the nearest water supply wells is included as Figure 2.
- Redevelopment activities planned at the site will include the expansion of the roadway and the nearby intersection to encompass the entire site. The site will be graded and capped with asphalt for the roadway realignment. A figure depicting the tentative roadway realignment plan is included as Figure 3.

Exposure Pathway Assessment

The site is currently grassed and not in use; however future redevelopment plans have the site incorporated as part of the roadway extension of South Union Street and East 13th Street. Any remaining sections of the site will be capped with asphalt to provide overflow parking for the neighboring businesses. This will further prevent exposure through direct contact, ingestion and inhalation. A summary is provided below.

Impact Source	Exposure Pathway	Potential for Exposure	Complete Pathway	Comments
Soil	Direct Contact	No	Limited	Limited – potential direct contact exposure during roadway construction activities, site will be covered and paved after construction
	Migration to Groundwater	Yes	Limited	Excluded – grassed area with limited access with future asphalt capped
	Inhalation	No	Incomplete	Excluded – No buildings onsite
Groundwater	Ingestion	No	Incomplete	Excluded – municipal water supply
	Direct Contact	No	Limited	Excluded – municipal water supply
	Inhalation	No	Limited	Excluded – municipal water supply



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Only limited direct contact with impacted soils is present during the roadway construction at the site; however soil impacts encountered are present below IDEM RISC Residential Direct Contact Levels. The direct contact with soil/groundwater, ingestion and inhalation from soil/groundwater pathways can be eliminated from potential exposure through the use of an Industrial Deed Restriction. This notice restricts the land-use of this site to commercial/industrial uses limiting the use and contact of any on-site soil and groundwater. Due to the limited extent of impacts onsite and the future redevelopment plans of the site; Qepi is requesting NFA status be granted without a formal deed restriction in place. The presence of a roadway along with a paved, capped asphalt parking area restricts the land use of the property and limits its use and contact.

Conclusions

Based on the results of the site investigation activities, only limited impacts slightly exceeding IDEM RISC RDCLs have been encountered at the site. These impacts are located centrally at the site, and have been horizontally and vertically delineated. Impacts do not appear to be migrating offsite in any direction.

Due to the historic nature of the release at the site, the limited receptors and the limited exposure pathways present, it is unlikely that these impacts pose a risk to human health and/or the environment. Based on future redevelopment at the site, any impacts present will be further contained by an asphalt cap or a roadway. Due to these factors, Qepi is requesting No Further Action status under the IDEM RISC guidance.

If you have any questions regarding this closure request, please contact me at (574) 234-1475. Qepi is looking forward to working in a cooperative effort with IDEM to efficiently bring a closure status to this LUST Incident. Thank you for your consideration in this matter.

Sincerely,

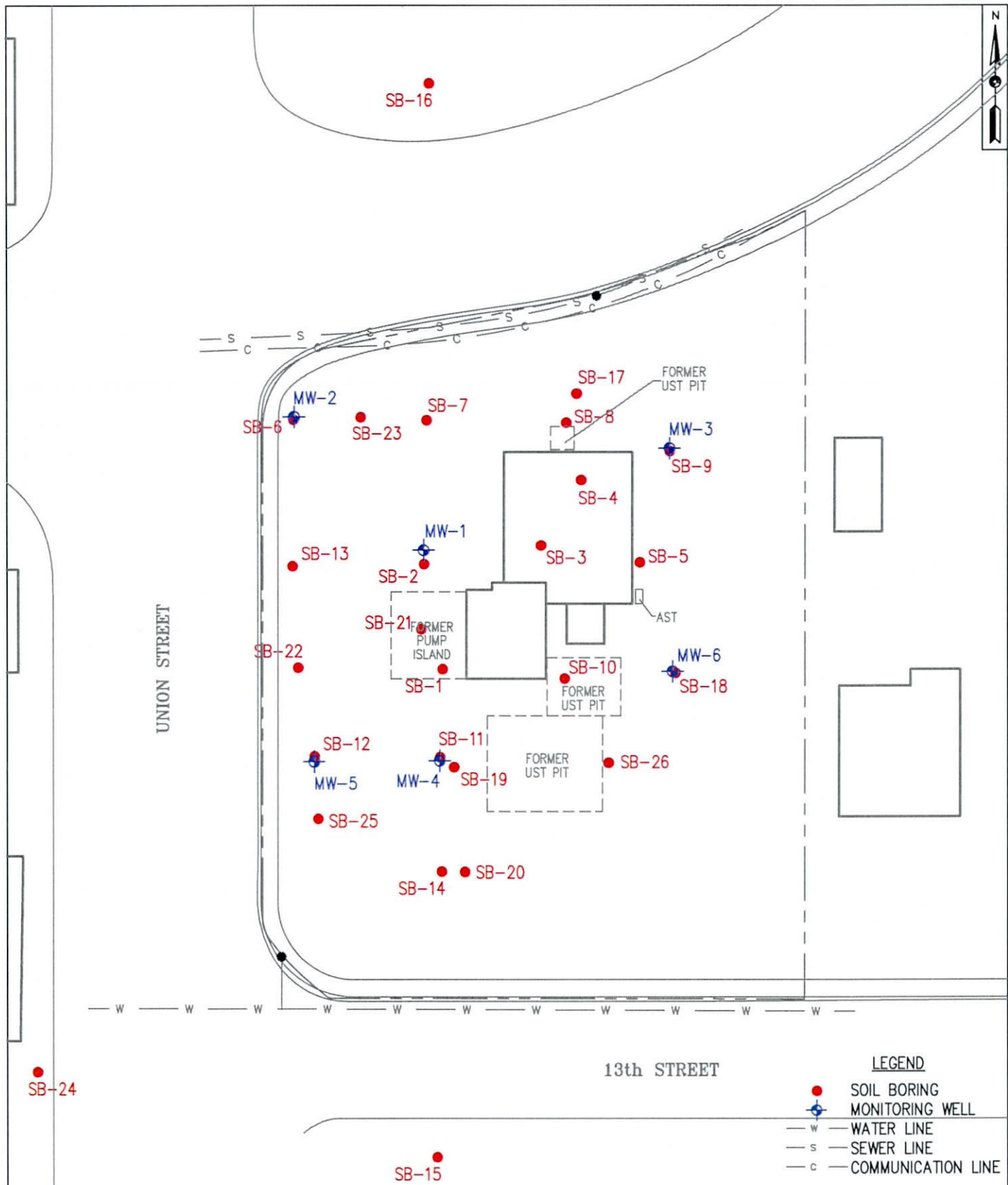
A handwritten signature in black ink, appearing to read 'Nivas R. Vijay'.

Nivas R. Vijay, CHMM
Project Manager

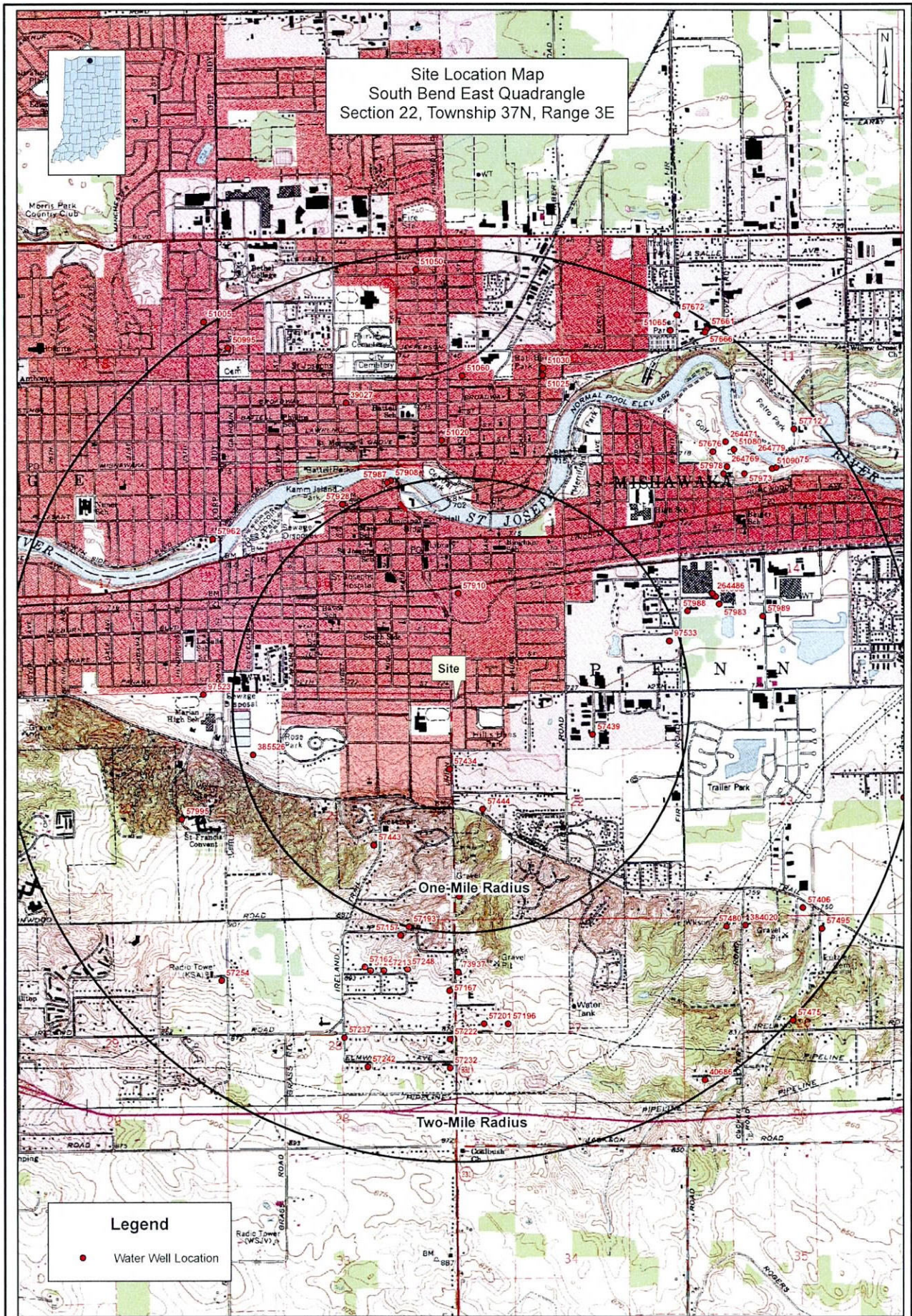
A handwritten signature in black ink, appearing to read 'Brent A. Dayharsh'.

Brent A. Dayharsh, LPG
Director of Technical Operations

Figures



PROJECT NO. 07-01-05	DATE 9/24/10
DRAWN BY CWH	SCALE 1"=30'
CHECKED BY NRV	SHEET 1



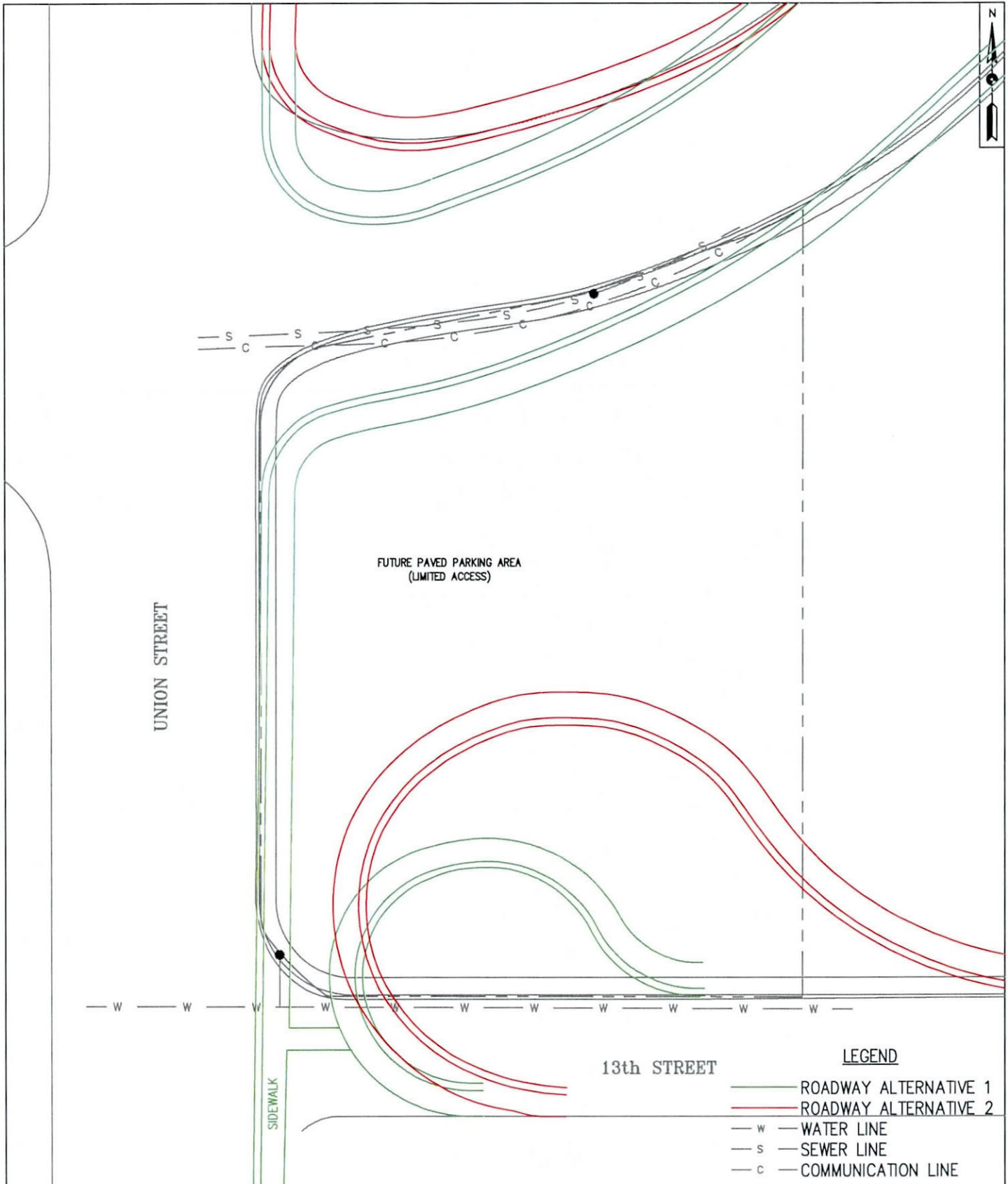


FIGURE 3
PROPOSED ROADWAY
FORMER UNION STREET SUNOCO
1126 SOUTH UNION STREET
MISHAWAKA, INDIANA

PROJECT NO. 07-01-05	DATE 9/24/10
DRAWN BY CWH	SCALE 1" = 30'
CHECKED BY NRV	SHEET 1

Tables

Table 1
Soil Sample Analytical Results
Former Union Street Sunoco
1126 South Union Street
Mishawaka, Indiana

Sample I.D.	Date	Sample Depth (ft)	TPH Gasoline Range	TPH Extended Range	Benzene	Toluene	Ethylbenzene	Total Xylene	MTBE	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a,h)anthracene	Indeno(1,2,3-cd)pyrene	Naphthalene
			(ppm)	(ppm)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)
SB-1	4/13/2007	2-4	<1.1	NA	<6	<6	<6	<11	<6	NS	NS	NS	NS	NS	NS	NS	NS
SB-2	4/13/2007	4-6	<1.1	NA	<6	<6	83.4	138	<6	NS	NS	NS	NS	NS	NS	NS	NS
SB-3	4/13/2007	8-10	<1.0	122	<5	<5	<5	15	<5	NS	NS	NS	NS	NS	NS	NS	NS
SB-4	4/13/2007	6-8	2.33	53	<7	8.83	271	479	<7	NS	NS	NS	NS	NS	NS	NS	NS
SB-5	4/13/2007	4-6	<1.9	<37	<9	<9	<9	<19	<9	NS	NS	NS	NS	NS	NS	NS	NS
SB-6	2/28/2008	8'-10'	<20	46	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-8	2/28/2008	8'-10'	<20	26	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-10	2/29/2008	8'-10'	<20	53	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-11	2/28/2008	6'-8'	<20	595	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-15	6/18/2008	10'-12'	<16.3	<22	<5	<5	<5	<11	<5	NS	NS	NS	NS	NS	NS	NS	NS
SB-16	6/18/2008	10'-12'	<15.6	<21	<5	<5	<5	<10	<5	NS	NS	NS	NS	NS	NS	NS	NS
SB-17	8/26/2009	8'-10'	<15.6	<21	<5	<5	<5	<10	<5	<34	<34	<34	<34	<34	<34	<34	<34
		14'-16'	<16.5	<22	<5	<5	<5	<11	<5	<36	<36	<36	<36	<36	<36	<36	<36
SB-18	8/26/2009	10'-12'	<15.5	<21	<5	<5	<5	<10	<5	<34	<34	<34	<34	<34	<34	<34	<34
		14'-16'	<16.7	<22	<6	<6	<6	<6	<11	<6	<37	<37	<37	<37	<37	<37	<37
SB-19	8/26/2009	8'-10'	<15.8	<21	<5	<5	<5	<11	<5	<35	<35	<35	<35	<35	<35	<35	106
		16'-18'	<16.5	<22	<5	<5	<5	<11	<5	<36	<36	<36	<36	<36	<36	<36	<36
SB-20	8/27/2009	10'-12'	<16.9	<22	<6	<6	<6	<11	<6	<37	<37	<37	<37	<37	<37	<37	<37
		14'-16'	<17.9	<24	<6	<6	<6	<12	<6	<39	<39	<39	<39	<39	<39	<39	<39
SB-21	8/26/2009	8'-10'	147	62	<34	<269	1,010	3,320	<180	<35	<35	<35	<35	<35	<35	<35	120
		16'-18'	<17.0	<23	<6	<6	<6	<6	<11	<6	<38	<38	<38	<38	<38	<38	<38
SB-22	8/26/2009	10'-12'	<15.6	<21	<5	<5	<5	<10	<5	<34	<34	<34	<34	<34	<34	<34	121
		16'-18'	<17.4	<23	<6	<6	<6	<12	<6	<38	<38	<38	<38	<38	<38	<38	<38
SB-23	8/26/2009	10'-12'	115	23	<34	<258	<258	<516	<180	<34	<34	<34	<34	<34	<34	<34	237
		16'-18'	<17.0	<23	<6	<6	<6	<6	<11	<6	<38	<38	<38	<38	<38	<38	<38
SB-24	8/27/2009	8'-10'	<16.3	<22	<5	<5	<5	<11	<5	<36	<36	<36	<36	<36	<36	<36	<36
		14'-16'	<15.6	<21	<5	<5	<5	<10	<5	<34	<34	<34	<34	<34	<34	<34	<34
SB-25	8/27/2009	8'-10'	<15.6	<21	<5	<5	<5	<10	<5	<34	<34	<34	<34	<34	<34	<34	54
		14'-16'	<17.2	<23	<6	<6	<6	<11	<6	<38	<38	<38	<38	<38	<38	<38	<38
SB-26	8/27/2009	8'-10'	<17	39	<6	<6	<6	<11	<6	<38	<38	<38	<38	<38	<38	<38	<38
		14'-16'	<16.9	<22	<6	<6	<6	<11	<6	<37	<37	<37	<37	<37	<37	<37	<37
RISC Default Residential			120	230	34	13,000	12,000	170,000	180	5,000	500	5,000	39,000	25,000	500	3,100	700
RISC Default Industrial			1,500	2,300	350	160,000	240,000	170,000	3,200	15,000	1,500	15,000	39,000	25,000	1,500	3,100	170,000

Laboratory analysis by ENVision Laboratories, Inc. Indianapolis, Indiana

Results in bold exceed IDEM RISC Default Residential Cleanup Objectives

Results Shaded exceed IDEM RISC Default Industrial Cleanup Objectives

Note TPH (GRO/ERO) RISC Default Cleanup Objectives Amended June 29, 2009

NS = Parameter not analyzed

< = result is less than laboratory detection limit

ppb = parts per billion

ppm = parts per million

Table 2
Groundwater Analytical Results
Former Union Street Sunoco
1124 South Union Street
Mishawaka, Indiana

Sample ID	Date	Depth to Water	Groundwater Elevation	TPH Gasoline Range	TPH Extended Range	Benzene	Toluene	Ethylbenzene	Total Xylenes	MTBE	Naphthalene (0021/0240)	Benzo(a)anthracene	Benzo(b)pyrene	Benzo(k)fluoranthene	Benzo(i)fluoranthene	Chrysene	Dibenz(a,h)anthracene	Indeno(1,2,3-cd)pyrene	Naphthalene (0270/0310)	n-Propylbenzene	1,2,4-Trimethylbenzene	1,2,5-Trimethylbenzene	
				(ppm)	(ppm)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)
SB-1	4/13/2007	-	-	1,510	NA	6.84	<5	53.2	192	<5	NA	NS	NS	NS	NS	NS	NS	NS	NS	NA	NA	NA	NA
SB-2	4/13/2007	-	-	13,400	NA	47.1	<50	1,130	2,480	<40	NA	NS	NS	NS	NS	NS	NS	NS	NS	NA	NA	NA	NA
SB-3	4/13/2007	-	-	1,830	2,410	<5	<5	40.2	121	<5	53.8	NS	NS	NS	NS	NS	NS	NS	NS	54	171	134	
SB-4	4/13/2007	-	-	<100	434	<5	<5	<5	5.21	<5	2.0	NS	NS	NS	NS	NS	NS	NS	NS	<5	8.32	<5	
SB-5	4/13/2007	-	-	<100	<100	<5	<5	<5	<10	<5	<5	NS	NS	NS	NS	NS	NS	NS	NS	<5	<5	<5	
SB-7	2/28/2008	-	-	474	1,100	<5	<5	82.2	248	<5	69	NS	NS	NS	NS	NS	NS	NS	NS	35	209	56.9	
SB-8	2/28/2008	-	-	1,520	1,820	<5	<5	180	301	<5	231	NS	NS	NS	NS	NS	NS	NS	NS	73.8	392	140	
SB-10	2/29/2008	-	-	<220	1,420	<5	<5	<5	<10	<5	<5	NS	NS	NS	NS	NS	NS	NS	NS	<5	<5	<5	
SB-13	2/28/2008	-	-	<220	<100	<5	<5	<5	5.9	<5	<5	NS	NS	NS	NS	NS	NS	NS	NS	<5	6.89	<5	
SB-14	2/29/2008	-	-	<220	660	<5	<5	<5	<10	<5	<5	NS	NS	NS	NS	NS	NS	NS	NS	9.3	32.8	13.2	
MW-1	3/25/2008	10.87	88.71	8,450	8,900	18.6	<50	877	2,970	<40	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TOC = 99.58	9/4/2009	10.94	88.64	15,300	12,100	<5	<50	872	2,270	<40	173	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	98.1	NS	NS	NS	NS
	3/31/2010	11.15	88.43	14,200	27,300	14.5	<50	767	2,020	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	324	NS	NS	NS	NS
SB-6/MW-2	3/25/2008	11.04	88.48	3,690	1,700	<5	<50	37.6	137	<40	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TOC = 99.52	9/4/2009	10.93	88.59	626	133	<5	<5	12.6	24.7	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	1.41	NS	NS	NS	NS
	3/31/2010	11.14	88.38	<220	456	<5	<5	<5	<10	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	1.8	NS	NS	NS	NS
SB-9/MW-3	3/25/2008	10.86	88.87	<220	<100	<5	<5	<5	<10	<5	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TOC = 99.73	9/4/2009	11.12	88.61	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
	3/31/2010	11.32	88.41	<220	<100	<5	<5	<5	<10	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
SB-11/MW-4	3/25/2008	11.02	88.76	2,750	4,200	<5	<50	158	1,230	<40	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TOC = 99.78	9/4/2009	11.10	88.68	1,500	998	<5	<50	59.2	126	<40	28.6	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	21.2	NS	NS	NS	NS
	3/31/2010	11.30	88.48	1,010	2,360	<5	<5	46.5	101	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	14.9	NS	NS	NS	NS
SB-12/MW-5	3/25/2008	10.44	88.77	3,830	2,800	7.74	<5	65.0	300	<5	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TOC = 99.21	9/4/2009	10.52	88.69	2,570	1,640	<5	<5	44.9	38.6	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	6.24	NS	NS	NS	NS
	3/31/2010	10.72	88.49	1,790	5,310	<5	<5	36.2	39.8	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	27.7	NS	NS	NS	NS
SB-15	6/18/2008	-	-	<220	<100	<5	<5	<5	<10	<5	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-16	6/18/2008	-	-	<220	<100	<5	<5	<5	<10	<5	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
SB-17	8/26/2009	-	-	NS	NS	NS	NS	NS	NS	NS	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
SB-18/MW-6	9/4/2009	10.73	88.71	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
TOC = 99.44	3/31/2010	10.93	88.51	<220	<100	<5	<5	<5	<10	<5	NS	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
	8/27/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
SB-20	8/27/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
SB-21	8/26/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
SB-22	8/26/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
SB-24	8/27/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
SB-25	8/27/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
SB-26	8/27/2009	-	-	<220	<100	<5	<5	<5	<10	<5	<5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.022	<1.0	NS	NS	NS	NS
RISC Default Residential Cleanup Objective				-	-	5	1,000	700	10,000	40	8.3	1.2	0.2	1.2	0.8	1.6	0.12	0.022	8.3	310	16.0	16.0	
RISC Default Industrial Cleanup Objective				-	-	52	20,000	10,000	20,000	870	2,000	3.9	0.39	1.5	0.8	1.6	0.12	0.022	2,000	4,100	5,100	5,100	

Laboratory analysis by ENVision Laboratories, Inc. Indianapolis, Indiana
 Results in bold exceed IDEM RISC Default Residential Cleanup Goals
 Results Shaded exceed IDEM RISC Default Industrial Cleanup Objectives
 Note TPH (GRO/ERO) RISC Default Cleanup Objectives Amended June 29, 2009; Objectives discontinued June 17, 2010
 NS = Parameter not analyzed
 < = result is less than laboratory detection limit
 ppb = parts per billion
 ppm = parts per million

Attachment A


INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

August 26, 2010

VIA CERTIFIED MAIL

Ms. Lory Timmer
Department of Redevelopment
City of Mishawaka
600 East Third Street
Mishawaka, IN 46544
574-258-1668

**Re: Site Characterization Approval and
Request for Closure Strategy**
Former Union Street Sunoco
1126 South Union Street
Mishawaka, IN 46544
FID# 9672
LUST# 199401501

Dear Ms. Timmer:

The Indiana Department of Environmental Management (IDEM) reviewed your file pertaining to a release of petroleum product for the former Union Street Sunoco located at 1126 South Union Street. The following documents were reviewed:

- Further Site Investigation Amendment Report prepared by Quality Environmental Professionals, Inc. (QEPI), dated October 19, 2009
- FSI Amendment Report-Level IV QA/QC Data prepared by QEPI, dated April 30, 2010

In accordance with, IC 13-23-13, 329 IAC 9-5-5.1, and 329 IAC 9-5-6, your site characterization is approved. IDEM staff determined that the release may be eligible for a no further action. In order for IDEM to determine if the release is eligible, IDEM requests the following information supporting closure:

- Brief summary of corrective action steps completed to date
- Overview of current site conditions including nature and extent of contaminants and potential for contaminant migration, e.g. plume stability and preferential pathways
- Brief discussion of actual or potential exposure to contaminants

Ms. Lory Timmer
FID # 9672 (Incident # 199401501)

August 26, 2010
Page 2 of 2

- Additional site-specific considerations supporting a conclusion that site risks have been reduced to acceptable levels or completed or potential exposures pathways are controlled
- Additional exposure control mechanisms proposed to manage risk and control exposure pathways, such as:
 - Environmental restrictive covenants (ERCs) including activity restrictions and engineering controls (Include draft ERCs)
 - Environmental restrictive ordinance – (Include ordinance)

Please refer to the enclosure titled "Office of Land Quality Document Submittal Guidelines" for current document submittal requirements. The guidelines may also be found online at: http://www.in.gov/idem/files/lust_document_submittal_guidance.doc.

Please submit all items to the following address:

67-18
Indiana Department of Environmental Management
Office of Land Quality
Leaking Underground Storage Tank Section
100 N. Senate Ave., Room 1101
Indianapolis, IN 46204-2251

If you have any questions, please contact me at 317/234-0982 or toll free from within Indiana at 800/451-6027. I can also be reached via email at: aseymour@idem.in.gov.

Sincerely,



Amy L. Seymour
Environmental Project Manager
Leaking Underground Storage Tank Section
Office of Land Quality

ecopy: IDEM File
St. Joseph County Health Department
Mr. Nivas Vijay, QEPI
Mr. David Lawrence, IDEM Northern Regional Office

If you would like to provide IDEM with feedback on our job performance, please go to <http://www.in.gov/idem/5681.htm> and complete our "Remediation Program Customer Satisfaction Survey". Your responses are anonymous and we appreciate the feedback on what we are doing well, and what we need to improve.