

8-16-2000



SBI-005

August 14, 2000

Mr. Andrew Laurent
Economic Development Specialist
City of South Bend
Department of Community Economic Development
12th Floor City-County Building
227 West Jefferson Boulevard
South Bend, Indiana 46601

Re: Comments from Hull & Associates, Inc. - Former Oliver Plow Works Site
Envirocorp No. 81Z1330

Dear Mr. Laurent:

Per your request, this letter will serve to summarize Envirocorp Inc.'s (Envirocorp) response to the comments received by the City from Hull & Associates, Inc. (Hull) in their letter dated August 2, 2000 in reference to work previously completed by Envirocorp at the above-referenced site. We have been in touch with Mr. Turley and welcome Hull's input. For ease in review, the items listed in *italics* follow the Hull letter heading format.

Phase I Site Assessment Report

Records Review:

The corrective action activities (CORRACTS) and non-CORRACTS search radius distances were inadvertently reversed in the report text. Envirocorp did search the appropriate distance.

Interviews:

Envirocorp did in fact interview a long time employee after the Phase I report had been issued. The information received from this individual formed the basis for a large portion of the subsurface trenching investigation as described in the Phase II Site Assessment Addendum.

Recommendations - Sewer System:

Envirocorp agrees with Hull's concern that former sewer lines may act as repositories for various contaminants. Indeed, previous consultants investigating this site expressed similar concerns. Previous discussions between the City and Envirocorp personnel deleted this concern from the investigative Scope of Work primarily due to the costs involved. This issue can be re-addressed by the City as part of the Indiana Department of Environmental Management (IDEM) Voluntary Response Program (VRP) process, if desired.

Mr. Andrew Laurent
City of South Bend

August 14, 2000
Page 2

Recommendations - Drywells:

Envirocorp agrees with Hull's concern that drywells may be associated with source areas. The suspected drywells on the subject site appear to be associated with parking lot and driveway stormwater control and generally are not located in areas where waste storage likely occurred in the past. The waste storage areas were subject to sampling efforts as part of Envirocorp's Phase II investigation. This issue can be re-addressed by the City as part of the IDEM VRP process, if desired.

Recommendations - Underground Storage Tanks:

From information presented in the Phase I Site Assessment report, it is possible that one or more underground storage tanks (USTs) remain at the site, most likely immediately adjacent to or beneath buildings. A decision should be made regarding whether to handle this issue as part of the IDEM VRP process or whether to deal with the issue during building demolition.

It would be advisable to seek legal assistance from a real estate attorney familiar with environmental liabilities and indemnification agreements in regards to each of the issues addressed by Hull and referenced above under the "recommendations" heading.

Phase II Site Assessment Report

Soil Boring and Monitor Well Placement:

Hull is correct in that the borings/wells completed by Envirocorp were placed in relation to areas of concern identified in the Phase I Site Assessment process. Envirocorp did not focus investigative efforts in areas of drywells or sewers as discussed earlier in this letter. These areas can certainly be added to the proposed IDEM VRP Scope of Work at the City's request.

Findings from Soil Borings:

Envirocorp agrees with Hull's recommendation that additional confirmatory soil samples will need to be obtained as part of the IDEM VRP process. Envirocorp has conceptually addressed this issue in developing a budgetary estimate for the City to complete the IDEM VRP process. Envirocorp will formally address this issue during preparation of the VRP Work Plan.

Envirocorp inadvertently left out the location of soil boring OP-26 from Figure 2. For future reference, boring OP-26 was located just to the west of a line between boring OP-25 and monitor well MW-1. The concentrations of PCE in soil samples from OP-25 (160 parts per billion {ppb}) and OP-26 (41 ppb) were well below the IDEM VRP subsurface soil cleanup standard of 8,010 ppb. The depth at which soil samples were collected and found to be impacted in these two borings may be indicative of groundwater conditions given their relative proximity to the water table.

Mr. Andrew Laurent
City of South Bend

August 14, 2000
Page 3

Findings from Groundwater Analysis:

Envirocorp agrees with Hull's hypothesis that the PCE found in monitor well MW-1 may be very close to a source. Being an upgradient location, it is also possible that the site may be inheriting the problem from industrial land use nearby. Envirocorp proposes to address this issue during the IDEM VRP issue to the extent the City desires depending on the desired scope of the covenant not-to-sue. Hull's concern that residential Tier II values may be exceeded for certain groundwater constituents is valid; however, the City is reminded that a conscious decision was made to focus the report findings on non-residential cleanup standards given the past and projected future land use of the subject property. Use of municipal water by the nearby residences limits the human health threat that may be posed by impacted groundwater which may be located beneath or adjacent to these properties.

It is Envirocorp's understanding that legal protection exists within the State of Indiana for property owners where groundwater contamination is found to be impacting a property from a source off-site. Should this remain an issue, it is advisable to seek knowledgeable legal counsel to address this matter.

Envirocorp agrees with Hull's observations that free phase DNAPLs like PCE have a tendency to sink as they move through an aquifer. Envirocorp's previous Scope of Work focused on groundwater contaminants at the water table only, as stated in our report. It may be that PCE and/or its degradation compounds have traveled lower into the aquifer as they follow the path of groundwater movement. Envirocorp's experience in this geographic area indicates the base of the aquifer to be nearly 150 feet below grade (bg). It would be very costly to "chase" the contaminant plume vertically and laterally and would seem unwarranted should the source be located off-site and there are no receptors nearby. Once again, depending on the desired scope of the covenant not-to-sue and the City's budget for this project, this issue can be addressed during the IDEM VRP process.

Envirocorp agrees with Hull's opinion that access to water quality data from the (presumed) monitor well located on the RIS Paper Company property would be very useful. Perhaps the city or the county health department can use their authority to obtain this information.

Recommendations:

It appears that Hull was not provided with a copy of the Phase II Site Assessment Addendum which address their concerns as described in this section of their letter.

Envirocorp staff are available to meet with the City to discuss any or all of these items in more detail. By way of reminder, Envirocorp wishes to inform the City that passage of the long proposed Resource Conservation and Recovery Information System (RISC)-based cleanup standards by the IDEM may be forthcoming in the near future. It remains in the City's best financial interests to enter

Mr. Andrew Laurent
City of South Bend

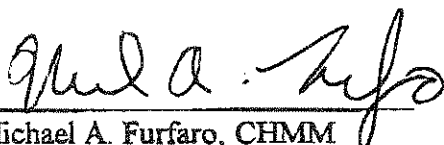
August 14, 2000
Page 4

this site in the IDEM VRP prior to RISC implementation for reasons we have discussed in the past. Review of the Work Plan will take at least 60 days before further investigative work can be conducted on the site. However, removal of asbestos and paint/oil residues can occur during the IDEM review period and before colder weather arrives.

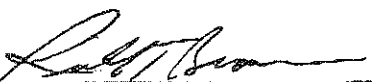
Envirocorp remains grateful for the opportunity to be of service to the City and we look forward to continuing with the closure of this project.

Sincerely,

Envirocorp Inc.



Michael A. Furfaro, CHMM
Project Manager



Richard T. Brown, REM, CHMM
Director of Environmental Projects

MAF-RTB/pjm