Florida Department of

Memorandum **Environmental Protection**

TO: Karen Shea, P.E. KBS

FROM: Julie A. Hardy JAH

DATE: December 27, 2007

SUBJECT: McKenzie Tank Lines September 17, 2007 Site Cleanup Report and October 11, 2007 Groundwater Sampling for Drum Removal Closure Report

I have reviewed the two reports submitted by Geovac Environmental Services, Inc. (Geovac), on behalf of McKenzie Tank Lines, Inc., located at 2778 West Tharpe Street, Tallahassee, Leon County, Florida. These reports were submitted in response to source removal activities performed at the site and, therefore, are to be considered together as an Interim Source Removal Report (ISRR). However, upon review, the ISRR appears to be incomplete. Items 1-13 of Rule 62-780.500(7)(a), Florida Administrative Code (F.A.C.) were not found in the report and are needed. Furthermore, the following concerns were noted:

1. The number of 55-gallon drums improperly stored onsite with potential to contaminate soils and groundwater was not included in the reports. This information is needed;

2. Composited samples were collected from four drums having "similar contents" for analysis of volatile organics by EPA Method 8260, acid and base neutral organics by EPA Method 8270, priority pollutant metals by various methods, and total recoverable hydrocarbons by FL-Pro. Table 1 shows over 50 different drum content descriptions. It is unclear if the sampling was sufficient since we do not know how many drums were in the area. The consultant should provide a discussion on their sampling and whether they feel it was adequate to identify the contents of the drums;

3. Due to the broad, imprecise description of the drum contents listed in Table 1, it is unclear if the contents of the drums were adequately screened for all possible pollutants. A discussion is needed to clarify the laboratory analytical methods used in screening the drum contents and identify the various laboratory analytical methods used;

4. Figure 1 of the Site Cleanup Report illustrates a "West Drum Accumulation Area" located west of the wash rack. It is unclear whether this area had a discharge. The consultant should provide clarification regarding the integrity of

the drums in the West Drum Accumulation Area and whether there was potential for a discharge in the area; and

5. The origin of Bis(2-ethylhexyl)phthalate concentrations exceeding the groundwater cleanup target level discovered in groundwater samples collected from monitoring well MW-2D needs to be addressed. Since it is a compound used in PVC pipe, it may be helpful to inspect the integrity of well MW-2D and resample the well.

On February 28, 2007, Florida Department of Environmental Protection (FDEP) and Environmental Protection Agency (EPA) Region IV personnel conducted an inspection of the McKenzie site in order to ensure compliance with the Resource Conservation and Recovery Act (RCRA) and Used Oil Program. At this time, they discovered several 55-gallon drums of material were being improperly stored and evidence of some spilled material.

On March 1, 2007 Geovac representatives conducted a characterization of drums and contaminated areas. Contents were initially identified by appearance, pH, and texture. Composited samples were collected from a "maximum of four drums having similar contents" and analyzed for volatile organics by EPA Method 8260, acid and base neutral organics by EPA Method 8270, priority pollutant metals by various methods, and total recoverable hydrocarbons by FL-Pro. The consultant indicates that in cases where the target cleanup levels were exceeded, appropriate samples were evaluated using the TCLP method. However, it is unclear if the consultant is referring to groundwater cleanup target levels (GCTLs) or soil cleanup target levels (SCTLS) since the drum contents are described and both liquid and solid. This needs to be addressed.

Impacted soils associated with the eastern drum storage area were excavated and legally disposed of at Soil Remediation, Inc., Georgia. Soil samples were collected from four sides and base of the excavation area and analyzed for volatile organics by EPA Method 8260, acid and base neutral organics by EPA Method 8270, priority pollutant metals by various methods, and total recoverable hydrocarbons by FL-Pro. The results showed arsenic concentrations above the residential SCTLs. A TCLP was performed and results were within acceptable limits for all parameters.

As mentioned above, Figure 1 of the Site Cleanup Report illustrates a "West Drum Accumulation Area" located west of the wash rack. No data was provided for the area and it is unclear whether a discharge occurred there. The consultant should provide a discussion regarding the area and its potential impacts.

Groundwater samples were collected on September 20, 2007 from wells MW-2S and MW-2D and analyzed for volatile organics by EPA Method 8260, acid and base neutral organics by EPA Method 8270, priority pollutant metals by various methods, and total recoverable hydrocarbons by FL-Pro. Analytical results, located in Table 1 of the October 11, 2007 Groundwater Sample Collection for Drum Removal Closure Report, shows concentrations of Bis(2-ethylhexyl)phthalate in MW-2D at 28 ug/L, exceeding the 6.0 ug/L GCTL. As mentioned above, since this parameter was not found in soil samples collected in the excavated area, the source of this constituent needs to be addressed.

CONCLUSION

In a meeting held on July 18, 2007 with FDEP personnel and McKenzie Tank Lines, Inc. representatives, the McKenzie representatives indicated that they would be performing source removal activities in the area where the drums were improperly stored and soil contamination was evident. At that time we explained that the source removal activities were to be conducted in accordance with Chapter 62-780, F.A.C. The September 17, 2007 Site Cleanup and October 11, 2007 Groundwater Sample reports appear to have been submitted in response to the source removal activities and are, therefore, considered an Interim Source Removal Report (ISRR).

The ISRR is incomplete and an ISRR Addendum is needed that meets the criteria of Rule 62-780.500(7)(a)(1-13), F.A.C. The addendum should also address the five concerns addressed in this review. As per Chapter 62-780, F.A.C., we should expect the addendum to be submitted within 60 days of our response letter receipt.

JAH:jh

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