Thursby, Kim

From: Curtis, Jeff [Jeff.Curtis@safety-kleen.com]
Sent: Friday, January 15, 2010 10:04 AM

To: Epost HWRS

Subject: RE: Safety Kleen Systems, Inc. FLD 984 171 694,56019/HO/006, Site Assessment-Request

for Time Frame Extension dated January 13, 2010

Received. Thank you,

Jeff Curtis EHS Manager, Florida Safety-Kleen Systems, Inc. Office: (561) 738-3026 Cell: (561) 523-4719 Fax (561) 731-1696 jeff.curtis@safety-kleen.com www.safety-kleen.com

From: Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]

Sent: Friday, January 15, 2010 9:35 AM

To: Curtis, Jeff

Cc: Kantor, Karen E.; RStebnisky@ectinc.com; Winston, Kathy; Bahr, Tim; Russell, Merlin; Tripp, Anthony **Subject:** Safety Kleen Systems, Inc. FLD 984 171 694,56019/HO/006, Site Assessment-Request for Time Frame

Extension dated January 13, 2010

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr Environmental Administrator

Hazardous Waste Regulation Department of Environmental Protection

E-Mail Address: epost_hwrs@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.



Florida Department of Environmental Protection Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

January 15, 2010

SENT VIA E-MAIL
Jeff.Curtis@safety-kleen.com

Attn: Mr. Jeff Curtis Safety Kleen Systems, Inc. 8755 Northwest 95th Street Medley, Florida 33178

Re: Safety Kleen Systems, Inc. FLD 984 171 694, Operating Permit 56019/HO/006, Site

Assessment-Request for Time Frame Extension dated January 13, 2010.

Dear Mr. Curtis:

Your request is approved for an extension to submit a complete Site Assessment Report (SAR) that meets the requirements of Rule 62-780.600(8), F.A.C. and the corrective action conditions of Operating Permit 56019/HO/006. The complete SAR shall be due no later than April 16, 2010. Keep in mind that the intent of site assessment under Chapter 62-780 is to continue assessment until it is completed. Therefore, if the proposed sampling does not complete assessment, assessment should continue without pause. To that effect, you may wish to consider minor changes to the proposed sampling. As an example, only shallow soil samples are proposed. You may wish to have deeper samples collected but not have them analyzed unless the shallow sample is contaminated.

In addition, I would like to offer a number of comments and suggestions to assist you with the field components of the assessment, the SAR and permit compliance.

Arsenic is a constituent of concern for soils, yet there is no proposal to sample for arsenic in the groundwater or evaluate leaching potential.

At this point, the groundwater data for barium support no need for additional sampling in groundwater although the final recommendation should be presented in the SAR after additional soil assessment for barium is completed.

I would suggest that the two rounds of groundwater elevation measurements be separated by event as long as practicable based upon schedule for completion.

Please note that DEP's Bureau of Solid and Hazardous Waste (BSHW) has recently upgraded its approach to environmental data quality assurance and the management of its databases. These changes will better serve the technological demands of the regulated community and the public. As of October 1, 2009 the Hazardous Waste Regulation Section (HWRS) has required that all data submitted to the program be submitted in an electronic format compatible with Automated Data Processing Tool software (ADaPT). ADaPT was developed for the automated evaluation of compliance with quality assurance requirements (Chapter 62-160, F.A.C.) and provides many functions. We have provided presentations concerning the development of ADaPT at the last several EPA/DEP Industry Workshops.

To assist with this transition to the ADaPT software, the Department notified state certified laboratories by letters dated October 2, 2008 and March 25, 2009 of its intent to require the use of ADaPT for the electronic submittal of water quality data to the Department. Most labs are currently using the ADaPT software.

DEP believes ADaPT is a great tool that can save considerable time in the review and reporting of data. An added benefit is that the BSHW can upload data to our Water Assurance Compliance System (WACS) database for use in decision making and legislative inquiries.

The use of ADaPT represents Phase One in the HWRS' approach to the evaluation and archiving of environmental data. Phase Two uploads the environmental data from ADaPT to our Water Assurance Compliance System database (WACS).

Currently, data submitted to the HWRS resides in paper files or as a photo image in an electronic report. Storing data in WACS will provide data that can be easily accessed by the HWRS, other Department or state programs, USEPA, facilities and the public. It is anticipated that the data will be more readily available to respond to legislative requests and other regional concerns.

In order to accomplish the storage of environmental data in WACS, the HWRS is requesting assistance from our regulated facilities. The WACS database requires information for each sampling location. We have designed a spreadsheet (electronic copy) for the necessary information that can then be used to upload location information into WACS. We are requesting that you compile the well information into this spreadsheet and resubmit this information electronically. Instructions for the spreadsheet are attached to this letter. Note that this effort will result in each of your wells being assigned a unique WACS identifier number. This number will become a mandatory component of future ADaPT submittals.

If your laboratory does not use ADaPT and you would like assistance, or if you have questions, we will be happy to address your concerns at this time. For technical questions concerning ADaPT, please contact Clark Moore by phone at (850) 245-8739 or by email at clark.b.moore@dep.state.fl.us. For administrative questions concerning the use of ADaPT or WACs, please contact Bryan Baker at (850) 245-8787 or bryan.baker@dep.state.fl.us.

At some point, a permit modification will be required (See permit condition Part I.19) to include this area of investigation as a Solid Waste Management Unit (SWMU) or Area of Concern (AOC).

I also suggest a close review of your permit to ensure that the conditions related to this assessment are met. As an example, condition I.23 requires warning signs at facilities where contamination is suspected or confirmed. Such signs should already be in place.

Lastly, ensure that FDEP is notified prior to the commencement of any field activities (well installation, sampling, surveying, etc.) so that FDEP will have time to observe activities if FDEP chooses to do so. An e-mail notification is preferred. Ensure that you copy me on the notification to Karen Kantor and Kathy Winston.

As always, if you have questions, please feel free to contact me at (850) 245–8796 or e-mail me at merlin.russell@dep.state.fl.us.

Sincerely,

Merlin D. Russell Jr.

Environmental Specialist III Hazardous Waste Regulation

MR/mdr Attachments e-mailed w/attachment to:

Karen Kantor, FDEP WPB, <u>Karen.E.Kantor@dep.state.fl.us</u>
Rick Stebnisky, ECT, <u>RStebnisky@ectinc.com</u>
Kathy Winston, FDEP WPB, <u>Kathy.Winston@dep.state.fl.us</u>

WACS Spreadsheet Instructions

Well Type Information

Testsite Name – Testsite is a generic term covering well sampling, surface water sampling, soil sampling, or air sampling. In the case of this spreadsheet, testsite is referring to a well. Testsite Name refers to the notation assigned to that well, e.g. MW-1. Once the well is entered into WACS it will also receive a WACS generated generic ID that will be unique to the well.

Testsite Status – This denotes whether the monitoring well is either 1) currently under a monitoring program (i.e. Active) or available to be in a monitoring program, or 2) not currently used for its intended purpose because it has been abandoned or is in such a state of disrepair that it no longer functions (i.e. Closed). The Department is most concerned about Active wells, but information on closed wells that is readily available would be appreciated. It is anticipated that some limited subset of historical data maybe entered using information from these closed wells.

Well Type – Please differentiate between any background wells (those upgradient of contamination), monitor wells, and boreholes. The Department recognizes that there are subdivisions of monitor wells, such as compliance and detection wells, but the general category of monitor well is appropriate for this database.

The following fields should generally be available from the Well Construction Summary Report required pursuant to 62-730 FAC.

Construction Completed – date construction was completed.

Construction Method – we recognize that the database does not allow entry of multiple construction methods. Please choose what you consider the choice most applicable and enter any explanatory comments in the Comment Field at the very end of the spreadsheet.

Well Plug Date

Well Diameter

Total Well Depth

Depth Relative to

Well Aquifer -

Top of Casing Elevation (and associated reference Datum)

Pad/Ground Level Elevation (and associated reference Datum) – The Surface Elevation entry.

Well Geographic Location Information

Latitude

Longitude

Coordinate Method (for lat/long) – The basis used for obtaining the geographic position of the testsite.

Easting – easting and northing data can be provided when lat/long information is not available. **Northing**

Coordinate Method (for easting/northing) -

Zone Information

The Zone Information uses terminology from the Underground Injection Control program which because of their deep depths monitors multiple distant aquifer zones from a single well. For hazardous waste purposes this is a multiple casing well or one that has multiple sampling points that might be located, for example in both an upper surficial and a lower surficial aquifer or 'zone'. There can be many aquifers (zones) monitored from the single well. In the case of a multiple casing well, merely fill in the relevant portion of the zone screen for width etc. and only inputting information for the screen information in the relevant zone.

The Hazardous Waste Regulation program has only a small number of wells that monitor multiple zones. So, almost all wells will monitor a single zone and only information for Zone #1 will be presented. Those few wells that monitor a second or more zones will continue to provide information for those zones in tables for Zone #2, etc.

Well Level – Choose a monitoring zone descriptor that most identifies this well's location from the drop down list.

Casing Type

Casing Depth – This depth is where the casing ends and the screen or open hole begins. Temporary casings should not be included.

Casing Diameter – this is surface casing, or the well casing if no surface casing exists.

Begin Screen/Open Hole Depth

Ending Screen/Open Hole Depth

Zone Aquifer – Choose the aquifer description from the drop down list that best describes this aquifer. Leave blank if unknown. We recognize some of the aquifer information is repetitive, but this is an unfortunate function of historic database design. Sorry for that!

Screen Type – if your screen type is not on the list, please provide the type in the comment field. **Filter Slot Size** – please covert to millimeters.

First Filter Material
Filter Pack Size
Begin 1st Filter Material
End 1st Filter Material

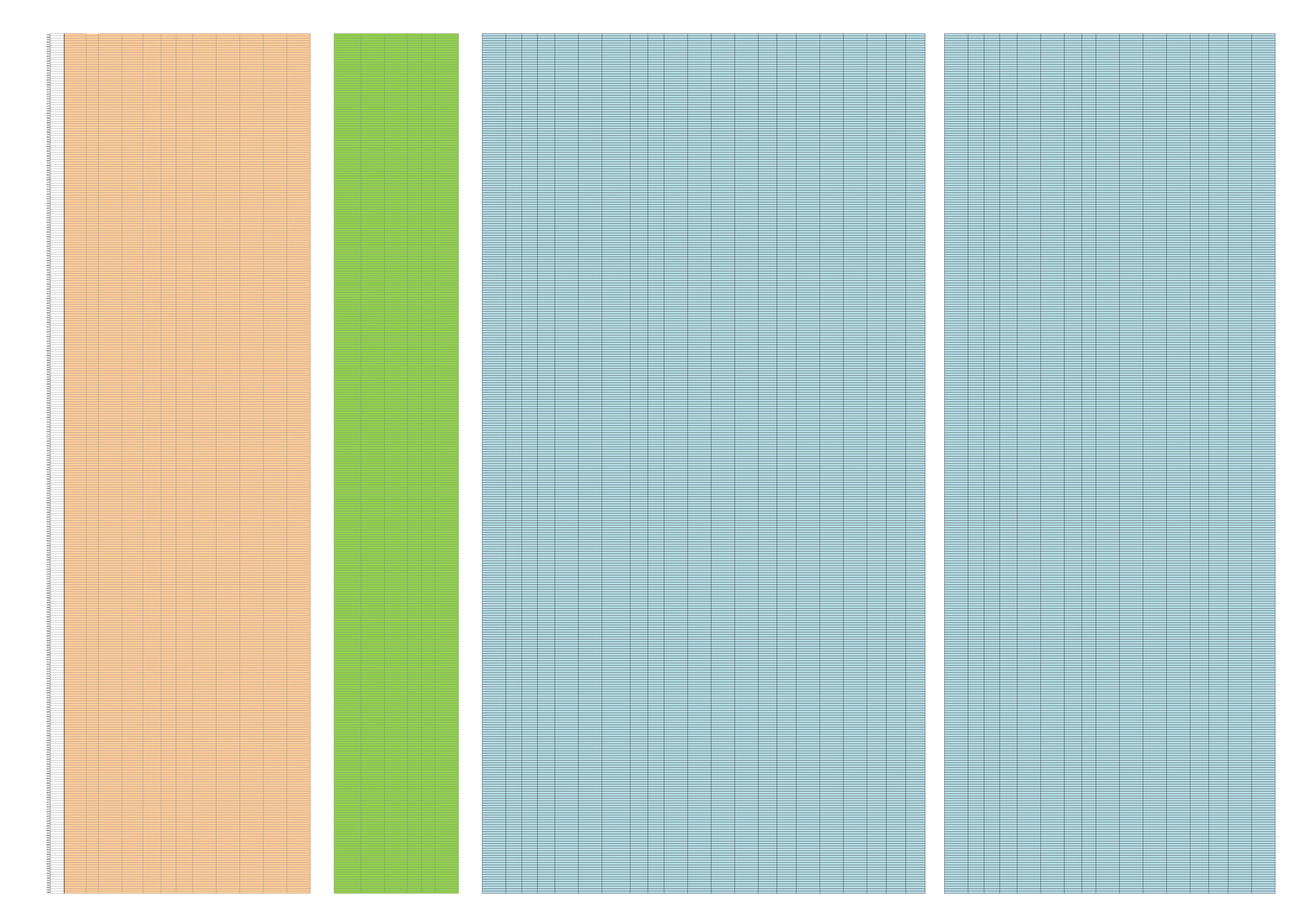
Some (**very**) small number of wells might have multiple filter materials. Please enter that information here.

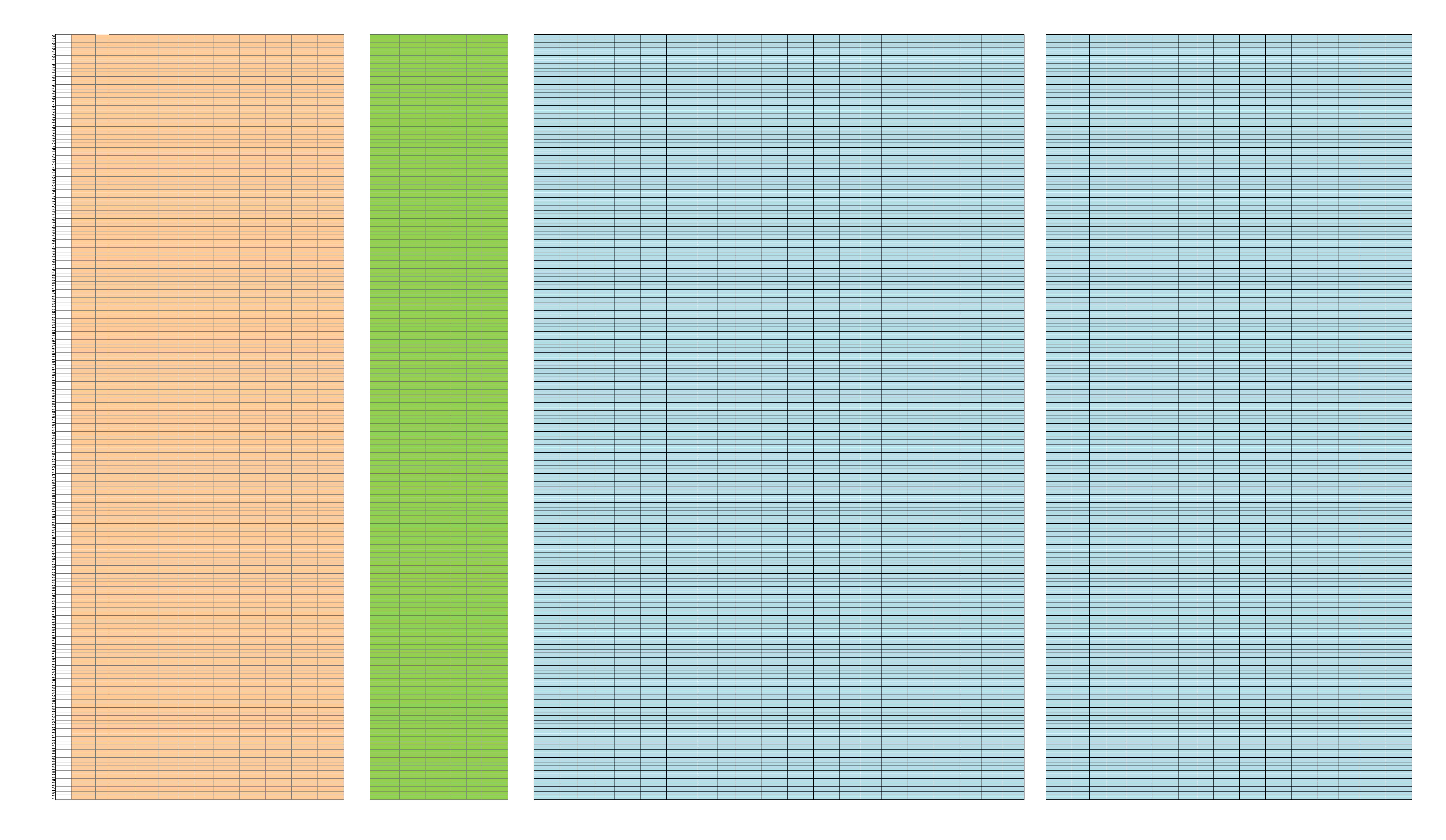
Second Filter Material Second Filter Pack Size Begin 2nd Filter Material End 2nd Filter Material

Well Seal Type Well Seal Thickness Well Seal Depth

Comment – this is a general comment field to tell us anything unique about this well, not just the zone that it's in.

Column C	aial 2nd Filter Pack Size Begin 2nd Filter Material Interval Depth (ft)





	Zone #3 Information														
End 2nd Filter Material Interval Depth (ft) Well Seal Type (feet) Well Seal Depth (feet) Comment	Well Lev	vel Casing Type	Casing Depth (ft) Casing Diameter (inches) Begin Screen/Open Hole Interval Depth (ft)	Ending Screen/Open Hole Interval Depth (ft) Zone Aquifer Screen Type Filter:	Slot Size (millimeters)	1st Filter Material	1st Filter Pack Size Begin 1st Interv	st Filter Material End 1st val Depth (ft) Inter	Filter Material 2r al Depth (ft)	nd Filter Material	2nd Filter Pack Size Begin 2nd Filter Material Interval Depth (ft) Interval Depth (ft)	Well Seal Type	Well Seal Thickness (feet)	Well Seal Depth (feet)	Comment