

Thursby, Kim

From: Schoepke, Robert [Robert.Schoepke@safety-kleen.com]
Sent: Friday, May 14, 2010 11:31 AM
To: Epost HWRS
Subject: RE: Safety Kleen Systems, Inc.-Medley; FLD 984 171 694, Site Assessment Report dated April 8, 2010

[This document has been received.](#)

From: Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]
Sent: Friday, May 14, 2010 9:56 AM
To: Schoepke, Robert
Cc: Curtis, Jeff; Echevarria, Edgar; Kantor, Karen E.; RStebnisky@ectinc.com; Winston, Kathy; Bahr, Tim; Russell, Merlin; Tripp, Anthony
Subject: Safety Kleen Systems, Inc.-Medley; FLD 984 171 694, Site Assessment Report dated April 8, 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.

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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.

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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

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Florida Department of
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Tallahassee, Florida 32399-2400

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Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 14, 2010

SENT VIA E-MAIL

Robert.Schoepke@safety-kleen.com

Attn: Mr. Bob Schoepke
Safety Kleen Systems, Inc.
1502 East Villa Street, 2nd Floor
Elgin, Illinois 60120

Re: Safety Kleen Systems, Inc. FLD 984 171 694, Operating Permit 56019/HO/006, *Site Assessment Report, Safety Kleen Systems, Inc., 8755 Northwest 95th Street, Medley, Florida* dated April 8, 2010

Dear Mr. Schoepke:

The SAR does not meet the requirements of Rule 62-780.600(8), F.A.C. as is discussed in further detail in the attached comments, primarily due to required information that is missing from the report. However, because Rule 62-780.600(7), F.A.C. allows a SAR to reference previously submitted documents, the Department has chosen to review previously submitted information contained in Safety Kleen's September 19, 2007 Part B permit application, that meets the rule requirements.

The SAR, combined with information in the Part B, contain sufficient information to develop a Remedial Action Plan (RAP). In order to complete the SAR and move forward toward a final remedy, you are instructed to submit a combined document in accordance with Rule 62-780.450, F.A.C. The combined document shall include a SAR addendum addressing the attached comments requiring a response, and a Remedial Action Plan (RAP) as recommended in the SAR's conclusions.

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., Professional Geologist II
Hazardous Waste Regulation

MR/mdr

Attachment




e-mailed w/attachment to:

Mr. Jeff Curtis, Safety Kleen, Jeff.Curtis@safety-kleen.com
Edgar Echevaria, FDEP, Edgar.Echevarria@dep.state.fl.us
Karen Kantor, FDEP WPB, Karen.E.Kantor@dep.state.fl.us
Rick Stebnisky, ECT, RStebnisky@ectinc.com
Kathy Winston, FDEP WPB, Kathy.Winston@dep.state.fl.us




Attachment

General Comments not Requiring a Response:

1. As a followup to the Department's January 15, 2010 letter, at some point the permit will be modified to include the area under investigation. Because a specific source of the contamination was not determined, this area will be considered an Area of Concern (AOC).
2. As noted in the cover letter, Rule 62-780.600(7), F.A.C. allows a SAR to reference previously submitted documents, and the Department has chosen to review previously submitted information, contained in Safety Kleen's September 19, 2007 Part B to determine compliance with required information. Safety Kleen should ensure that the Part B information is current whether or not a response is asked or not. If any of the information referenced in the Part B needs updating, the application update and subsequent permit modification should be done with the AOC modification mentioned in comment 1. above.
3. Safety Kleen should provide electronic data deliverables (EDDs) using ADaPT format (discussed in further detail below) with future groundwater monitoring reports.
4. An identification of present real property owner(s) was not provided (Rule 62-780.600(8)(a)(1)(a), F.A.C. However, the Part B identifies the land owner as Len Longshore.
5. The SAR is missing discussion on storage of waste antifreeze and mercury-containing lamps and devices. There is also no discussion or details on the container storage area (Rule 62-780.600(8)(a)(1)(b), F.A.C.). This information can be found in the Part B:

 Waste antifreeze	Part II.A.5
 Mercury-containing lamps	Part II.A.5
 Container storage area	Part II.B Containers







6. A description of all known products used or manufactured and of all known by products and wastes (including waste constituents) generated during the life of the facility was not included (Rule 62-780.600(8)(a)(1)(c), F.A.C.). A great deal of information on the products and the wastes can be gleaned from Safety Kleen's Part B:

 Description of Facility Operations	Part I.D.2 (discussions on products and wastes)
 Waste Types	Part I.D.3 (waste codes and annual quantities)
 Waste Information	Part II.A.5

7. A summary of *current* and past environmental permits and enforcement actions was not submitted (Rule 62-780.600(8)(a)(1)(d), F.A.C.). Safety Kleen's September 19, 2007 Part B lists seven existing or pending environmental permits (although some may have expired) in Part I.A.19. If this table needs to be updated, it should also be updated for the Part B. FDEP enforcement actions are summarized in other FDEP databases.

8. A figure showing the property boundary was not submitted (Rule 62-780.600(8)(a)(3), F.A.C.). Figure 2.2-4 in the Part B illustrates the legal boundaries.

9. A figure showing all buildings, utilities, sewers, floor drains, drain lines, and above and underground structures was not included (Rule 62-780.600(8)(a)(4), F.A.C.). A number of figures in the Part B identify catch basins and trenches.

-  Figure 2.1-1 Facility Layout & Access Control Features
-  Figure 2.2-4 Legal Boundaries
-  Figure 2.2-6 Locations of Hazardous Waste Storage Areas
-  Figure 5.6-4 Return/Fill Station
-  Figure 8.1-1 Container Storage Area
-  Figure 9.2-1 Tank Storage Area

General Comments Requiring a Response:

10. There should be a brief description of any permitted releases with focus on any discharge locations (Rule 62-780.600(8)(a)(1)(e), F.A.C.) and sampling requirements. If discharge locations are in ditches or conveyances that are not hard-piped, there should be discussion on any impacts the discharge(s) might have on groundwater flow because of the area's flat gradient.

11. A map of individual contaminant discharge locations (permitted or unpermitted), including the latitude and longitude coordinates of the known discharge locations, was not included (Rule 62-780.600(8)(a)(5), F.A.C.).

12. The SAR must include any off site activities (e.g., dewatering, active remediation, or flood control pumping) in the immediate vicinity of the site that may impact the groundwater flow at the site (Rule 62-780.600(3)(j), F.A.C.). If there are none, then simply state so.

Specific Comments not Requiring a Response:

(page/paragraph)

13. (3-1/Section 3.1 Potable Well Survey) The presence of injection or drainage wells as defined in Chapter 62-528, F.A.C. within 0.25 miles was not provided; however, the Part B (Part I.B.4) states that there are no injection or withdrawal wells on site, and to the best of Safety Kleen's knowledge, none are within 0.25 miles of the facility.

14. (8-4/Table): A "Not possible" exposure between wildlife and soil is inconsistent with the text on (8-5/4) which states that "Wildlife is *unlikely* [emphasis added] to be exposed to impacted soils...". The Department concurs with the "unlikely" exposure.

15. Table 2: The Total Chromium Leachability SCTL is 38 mg/kg.

16. (7-3/2): As depicted on Figure 6, the horizontal extent of PCE contaminated soils may not have been determined south or east of SB-1 or west, south and east of the MW-5 location. MW-5 is located within the parking area and is covered. Similarly, the vertical extent may not have been assessed. However, resampling of PCE on February 15 (See Table 2) indicated that PCE was below detection levels at SB-1 and SB-2 but PCE exceeded leachability levels at MW-5. These data suggest low levels of PCE in and around the MW-5 area. It is quite possible that low levels of PCE remain in areas beneath pavement or concrete buildings to the east. Based upon the low levels of soil and groundwater contamination at this time, any remaining soil contamination beneath the concrete of the tank storage area can be addressed at closure.

17. (7-3/3): The vertical extent of arsenic contamination was not determined. The two samples containing arsenic above residential SCTLs were taken at 1'0 bls. Both samples are located on either side of MW-1. The depth to water in MW-1 is between 2.0' and 3.3' bls. If excavation is selected as the remedy, confirmation samples from the bottom of the excavation can be used to verify that the arsenic-contaminated soils are removed. If a restrictive covenant is used, restrictions can be placed against the soils between the land surface and water table. If excavated, the low level PCE contaminated soils that are not covered by asphalt or concrete would also be removed.

Specific Comments Requiring a Response:
(page/paragraph)

18. (5-3/2) Here and elsewhere, the SAR states that investigation-derived waste (IDW) was drummed for disposal and managed through the Safety Kleen management system. The SAR should explain the Safety Kleen management system as it relates to management of IDW.

19. (8-2/3): As written, this paragraph suggests that the PCE-contaminated soil was in an unpaved area previously. Has this area recently been paved? Please clarify.

20. Figure 3:

- ✚ The grassy swale mentioned in (3-1/2) is not identified on this figure. The swale and direction(s) of surface water flow across the facility should be identified (Rule 62-780.600(8)(a)(3), F.A.C.). Also, if any stormwater flows offsite, Safety Kleen must determine its pathway and discharge into any natural or man-made water bodies (Rule 62-780.600(3)(i), F.A.C.). The runoff control system for the facility is discussed in the Part B (Part II.A.1.).

- ✚ Identify the dashed line around the "Above Ground Storage Tanks". From other site maps, it is not possible to identify what this line represents.

21. Appendix G: Other than SB-1/MW-2R, how were the Boring Log Sample Descriptions created? Were the descriptions taken from cuttings, split spoon, etc.?

Remedial Action Plan:

22. In developing the RAP, ensure that you review the corrective action requirements of your permit. In particular, note Specific Condition Part V.4, and Part VI.

23. As a reminder, the RAP must include a detailed cost estimate for financial assurance purposes as required by Specific Condition Part 1.32 of your permit.

ADaPT:

24. The Department of Environmental Protection's Bureau of Solid and Hazardous Waste (BSHW) is in the process of upgrading 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.




On October 1, 2009 the Hazardous Waste Regulation Section 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 held in December. Specific information on the ADaPT process is provided below.

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. Bureau staff contacted NELAC certified laboratories that are used by solid and hazardous waste facilities to determine their intent and readiness to use ADaPT.

We believe 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.

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, please contact Bryan Baker at (850) 245-8787 or bryan.baker@dep.state.fl.us.

Automated Data Processing Tool (ADaPT) software was developed for the automated evaluation of environmental quality data. ADaPT runs under Microsoft Access and is a tool that laboratories, consultants, solid and hazardous waste facility permittees and Department staff can all use to evaluate groundwater data. ADaPT performs the following functions:

-  an error check for correctness and completeness of the data;
-  checks blank contamination rules and accuracy and precision criteria for each method and sample matrix;
-  performs a data review that measures integrity of sample results against associated laboratory quality control, holding times, and method detection limits;

- ✚ checks the results for compliance against user selectable criteria and standards, such as water quality standards and cleanup target levels; and
- ✚ imports the latest monitoring data into the Department's Water Assurance Compliance System (WACS) database via public file transfer protocol (ftp).

Each program (hazardous waste, solid waste) maintains a 'library' within ADaPT of analytes and associated laboratory methods.

The ADaPT Electronic Data Deliverable (EDD) consists of two electronic deliverables:

- ✚ a Laboratory EDD, identified as "hwldd"; and
- ✚ a Field EDD identified as "hwfdd."

The Laboratory EDD shall be submitted in a comma separated (.csv format) text file which can be produced through Microsoft Excel. The Laboratory EDD file name format shall be: Florida Facility I.D. *space* Sampling Date (yyyymm).hwldd. The period at the end would not be included. For example, with Florida Facility I.D. 12345 and where sampling started in November and ended in December of 2008 the Laboratory EDD file name should be 12345 200812.hwldd.

The Field EDD shall be submitted in the same comma separated (.csv format) text file as the Laboratory EDD. The Field EDD file name format shall be: Florida Facility I.D. *space* Sampling Date (yyyymm).hwfdd. Again the period at the end is not included. For example, with Florida Facility I.D. 12345 and where sampling started in November and ended in December of 2008, the file name should be 12345 200812.hwfdd.

Water quality monitoring reports shall be signed and sealed by a Florida registered professional geologist or professional engineer with experience in hydrogeological investigations. A copy of the sealed signature page may be submitted electronically with the report provided that the seal is legible (gray the embossed seal and scan). Otherwise, you must submit an original sealed and signed page.

Two copies of the EDD, one in comma separated text format and one as an Adobe portable document format (.pdf) must be submitted. A digitally "signed" PDF serves to maintain the integrity of the EDD. In order to validate the quality assurance aspects of the laboratory EDD, the permittee shall ensure the laboratory processes the laboratory EDD through ADaPT using both their laboratory specific library and the DEP Hazardous Waste Master library and correct or explain all noted errors prior to submittal. The appropriate entity (laboratory, consultant, or permittee) shall also process the hazardous waste field EDD through ADaPT using the DEP Hazardous Waste Master library and correct or explain all noted errors prior to submittal. As a final completeness check, the permittee or consultant shall process both the lab EDD and field EDD through ADaPT and confirm a successful export to disk prior to submitting the lab EDD, field EDD, and ADaPT error log to the DEP.

Compliance with this direction will address the data submittal and quality assurance requirements of Rule 62-730.225(2) and (3) FAC.

The latest version of the ADaPT software in a zipped form is available for free at: <ftp://ftp.dep.state.fl.us/pub/WACS-ADaPT> and ADaPT training is available from LDC and other consultants. It is the responsibility of those supplying data to the Department to use the latest version of ADaPT.