

## Thursby, Kim

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**From:** Blevins, Kirk [kirk\_blevins@golder.com]  
**Sent:** Friday, October 15, 2010 5:53 AM  
**To:** Epost HWRS  
**Subject:** RE: Liquid Environmental Solutions (LES) fka IWS;FLD 981 928 484;RCRA Tank Closure and Solid Waste Management Units (SWMUs) Confirmatory Sampling Plan Dated August 5, 2010; and DEP Received on August 6, 2010

Please accept this email as verification of receipt of the document.

Kirk Blevins, CHMM

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**From:** Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]  
**Sent:** Thursday, October 14, 2010 2:18 PM  
**To:** Blevins, Kirk  
**Cc:** Oliveros, Jim; Patel, Ashwin; tommy.dudley@liquidenviro.com; tommy.dudley@liquidenviro.com; Holmes, Georgiana; 'jenna'; Echevarria, Edgar; knight.karen@epamail.epa.gov; Taylor, Tekla; Bahr, Tim; Kothur, Bheem; Tripp, Anthony  
**Subject:** Liquid Environmental Solutions (LES) fka IWS;FLD 981 928 484;RCRA Tank Closure and Solid Waste Management Units (SWMUs) Confirmatory Sampling Plan Dated August 5, 2010; and DEP Received on August 6, 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](http://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](mailto:epost_hwrs@dep.state.fl.us)

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# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

October 14, 2010

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Mimi A. Drew  
Secretary

SENT VIA EMAIL

[Kirk\\_Blevins@golder.com](mailto:Kirk_Blevins@golder.com)

Mr. Kirk A. Blevins, CHMM  
Project Manager  
Golder Associates Inc.  
9428 Baymeadows Road, Suite 400  
Jacksonville, FL 32256

RE: Liquid Environmental Solutions (LES) Facility  
1640 Talleyrand Avenue, Jacksonville, Florida  
Used Oil Permit No. 72815-HO-009; FLD 981 928 484  
RCRA Tank Closure and Solid Waste Management Units (SWMUs)  
Confirmatory Sampling Plan  
Dated August 5, 2010; and DEP Received on August 6, 2010.

Dear Mr. Blevins:

The Florida Department of Environmental Protection (FDEP) has completed its review of the August 5, 2010 submittal related to RCRA Tank Closure And Solid Waste Management Units and the Confirmatory Sampling Plan for Liquid Environmental Solutions (f.k.a. Industrial Water Services, Inc.), facility. The submitted documents are incomplete. Review comments are in the enclosed attachment.

Please review these comments and revise the report and re-submit within 30 days from receipt of this letter.

Should you have any questions, please contact me at (850) 245-8781 or e-mail:  
[bheem.kothur@dep.state.fl.us](mailto:bheem.kothur@dep.state.fl.us)

Sincerely,

Bheem Kothur, P.E. III  
Hazardous Waste Regulation

Mr. Kirk a. Blevins, CHMM

October 14, 2010

Page Two

BK/

Attachment

cc: James P. Oliveros, Golder Associates, Inc., [Jim\\_Oliveros@golder.com](mailto:Jim_Oliveros@golder.com)  
Ashwin Patel, DEP/Jacksonville, [ashwin.patel@dep.state.fl.us](mailto:ashwin.patel@dep.state.fl.us)  
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Tekla Taylor, Golder Associates, Inc. [Tekla\\_Taylor@golder.com](mailto:Tekla_Taylor@golder.com)

ATTACHMENT  
October 14, 2010  
Liquid Environmental Solutions, LLC  
EPA I.D. Number: FLD 981 928 484  
Permit No: 72815-HO-009  
RCRA Tank Closure and Confirmatory Sampling Plan  
Review Comments

Please address the following Comments:

1. Please add EPA I.D. Number and Facility Permit Number on RCRA Tank Closure and Confirmatory Sampling Plan Cover page and Cover Letter.
2. RCRA Tank Closure Report Title and Report Cover Letter Title should be the same. Please review and revise as appropriate.
3. Section 1.0 Introduction, 1.1 Background, Second Paragraph, Second Sentence, and Page 1: The closure plan for the facility addressed and approved in 2007 by FDEP is only appropriate for Used Oil tanks, not for the hazardous waste tanks. For hazardous waste tanks, the closure plan was addressed in the Permit Application dated December 16, 1991 (Refer to the existing permit Part V-Closure Conditions 2). Please review and revise as appropriate.
4. Section 1.0 Introduction, 1.2 General Scope, Second Paragraph, and Page 3: The text incorrectly states that DEP required IWS to maintain financial assurance (FA) because it is the property owner. DEP has informed IWS that it has to maintain FA as a former owner, until LES (new owner) establishes one. Please review the paragraph and revise as appropriate.
5. Sub-Section 2.1 Ground Water, Page 4; Appendix A, Laboratory Analytical Results: The presented analytical results appear to be below groundwater cleanup target levels (GCTLs) for MBTE and Benzene. However, the presented wells are not identified in the current permit site map or in the application. These wells are approximately 20 years old and of unknown construction and condition (e.g. siltation problems, integrity, screened interval, depth, etc). These issues we have also discussed in our June 10, 2010 meeting in Tallahassee. Please review and revise the report as appropriate.
6. Section 3.0 Tank Closure Plan: The tanks should be emptied, especially, sludge's should be removed and the entire tank system including associated piping and equipment must be flushed. All soil and GW sampling must include constituents of all waste and material the facility may have managed over the years and not only DO18. As an alternate, the sampling proposed in this section (page 5) may be appropriate as long as the list of metals is expanded to include all priority pollutant metals and not just the four listed. Please review the Section and revise as appropriate.
7. Section 4.1 Constituents of Concern, and Page 6: The sampling list should be same as the list on Page 5 with expanded metals list. Please revise as appropriate.
8. The existing permit states that the closure shall meet the requirements of 40 CFR-Part 264.197 and Subpart G to close the HW tanks not Chapter 62-770, Florida Administrative Code, which is

not a RCRA regulation. Closure of these tanks must meet these RCRA requirements. Revise appropriately.

9. Site Map, Figure 2: Sampling Plan is not addressed for Hazardous Waste Tanks 81 through 87. Facility must propose Soil Boring locations for these tanks and address in Section 4.0 Confirmatory Sampling Plan and include Constituents of Concern and Methodology.
10. Sub-Section 4.6, SWMU 11 F-Tertiary Containment, Second Paragraph, Second Sentence, Page 8: Please correct the meeting date from "February 8, 2010" to "February 9, 2010" with FDEP.
11. Sub-Section 4.6, SWMU 11-F- Tertiary containment, and Page 8: A sampling location should be added to the south of the containment system near tanks 7 and 9.
12. Sub-Section 4.7, SWMU 21- Underground oil/Wastewater Pipeline System, and Page 8: DEP does not agree with the request and approach, rather we recommend not combining SWMU 11F and SWMU 21 into one SWMU or area of concern (AOC).
13. Site Map, Figure 2, Hazardous Tank No. 6: Facility proposed only two (2) soil boring locations. DEP recommends adding another soil boring along the west side of the tank also.
14. Site Map, Figure 2, SWMU 4(Baffle Tank): Facility proposed only three (3) soil boring locations. DEP recommends adding another soil boring along the west side of SWMU 4 also.
15. Site Map, Figure 2, SWMU 4, Baffle Tank 8: Please identify the location of Baffle Tank 8 on Site Map, and Figure 2.
16. The revised closure plan shall include soil sampling at different depths at the perimeter of secondary containment and other locations, as necessary, and groundwater sampling. The analytical parameters should include all waste and waste constituents that may have been handled at this facility over the years.
17. Closure Schedule: This section is not included in this closure plan. Please review and add a Section to include the closure schedule to start to finish not more than 180 days that the closure activities and closure report can be accomplished.
18. Closure Cost Estimate: Please update or revise the closure cost estimates to complete RCRA closure activities on existing oily wastewater storage tanks at the facility. All estimates should be based upon the cost for a third party to perform the closure activities as required by 40 CFR Part 264.142. 'Third party' has been defined in the regulations as a party other than the parent or the subsidiary of the owner or operator. The estimates should also include the Hazardous and Solid Waste Amendments of 1984 (HSWA) Units or also called Solid Waste Management Units (SWMUs).