

Thursby, Kim

From: Blevins, Kirk [kirk_blevins@golder.com]
Sent: Friday, January 14, 2011 4:52 PM
To: Epost HWRS
Subject: RE: Liquid Environmental Solutions (LES);FLD 981 928 484;RCRA Tank Closure and Solid Waste Management Units (SWMUs) Confirmatory Sampling Plan and Facility Responses Dated November 5, 2010; and DEP Received on November 5, 2010

Hi Kim,

I received the document.

Kirk

Kirk Blevins, CHMM | Project Scientist/Geochemist | **Golder Associates Inc.**

9428 Baymeadows Road, Suite 400, Jacksonville, Florida, USA 32256

T: +1 (904) 363-3430 | **D:** (+1)(904) 363 3430 | **F:** +1 (904) 363-3445 | **C:** +1 904 616-0481 | **E:** kirk_blevins@golder.com
| www.golder.com

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

Sent: Friday, January 14, 2011 2:55 PM

To: Blevins, Kirk

Cc: Oliveros, Jim; Patel, Ashwin; tommy.dudley@liquidenviro.com; Holmes, Georgiana; Perry, Jenna D.; Echevarria, Edgar; Knight.Karen@epamail.epa.gov; Taylor, Tekla; Bahr, Tim; Goddard, Charles; Kothur, Bheem; Tripp, Anthony

Subject: Liquid Environmental Solutions (LES);FLD 981 928 484;RCRA Tank Closure and Solid Waste Management Units (SWMUs) Confirmatory Sampling Plan and Facility Responses Dated November 5, 2010; and DEP Received on November 5, 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.

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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 Environmental Protection

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

January 14, 2011

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Mimi A. Drew
Secretary

SENT VIA E-MAIL

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 and Facility Responses
Dated November 5, 2010; and DEP Received on November 5, 2010.

Dear Mr. Blevins:

The Florida Department of Environmental Protection (FDEP) has completed its review of the facility response request dated November 5, 2010 related to RCRA Tank Closure And Solid Waste Management Units and its Confirmatory Sampling Plan for Liquid Environmental Solutions (f.k.a. IWS) facility. The submitted documents are incomplete, specifically related to the number of soil samples as well as groundwater monitoring wells. Please refer to the revised comments which are enclosed as an attachment.

Please review these comments and revise the sampling plan/report accordingly and re-submit within 30 days upon receipt of the letter.

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

Sincerely,

Bheem Kothur, P.E. III
Hazardous Waste Regulation

Mr. Kirk a. Blevins, CHMM

January 14, 2011

Page Two

BK/

Attachment

cc (with attachment):

James P. Oliveros, Golder Associates, Inc., Jim_Oliveros@golder.com

Ashwin Patel, DEP/Jacksonville, ashwin.patel@dep.state.fl.us

Tommy Dudley, JR, tommy.dudley@liquidenviro.com

Georgiana Holmes, OGC/Tallahassee, Georgiana.holmes@dep.state.fl.us

Jenna Perry, DEP/Jacksonville, jenna.d.perry@dep.state.fl.us

Edgar Echevarria, DEP/Tallahassee, edgar.echevarria@dep.state.fl.us

Karen Knight, EPA Region 4, knight.karen@epamail.epa.gov

Tekla Taylor, Golder Associates, Inc. Tekla_Taylor@golder.com

ATTACHMENT
January 14, 2011
Liquid Environmental Solutions, LLC
EPA I.D. Number: FLD 981 928 484
Permit No: 72815-HO-009
RCRA Tank Closure and Confirmatory Sampling Plan

Please address the following Comments:

General Comments:

1. The Department of Environmental Protection (DEP) conducted a Site Visit of the facility on December 15, 2010. After visiting the site and careful review of the proposed confirmatory sampling plan submitted August 5, 2010 by their consultants (Golder Associates), DEP suggests that the facility revise the proposed sampling plan with regards the number and location of soil and groundwater samples and resubmit the plan to DEP.
2. The facility must revise the soil sampling plan to incorporate additional soil samples along the perimeter of the facility. As a general guide these samples should be approximately 30-40 feet apart. The exact location will be at the discretion of the facility based upon availability and access.
3. The facility must also propose additional groundwater monitoring wells. These wells shall be installed to demonstrate there is no down-gradient, off-property migration of contaminated groundwater. The facility shall be responsible for demonstrating that these wells sufficiently delineate any possible off-property migration.
4. The sampling methods and constituents of concern shall remain the same as those specified in the October 15, 2010 DEP comments to the August 5, 2010 document from the facility and as discussed during the facility site visit of December 15, 2010.