



June 6, 2011

Environmental Administrator  
Hazardous Waste Regulation Section M.S. 4560  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Attention: Mr. Merlin D. Russell, Jr.  
Environmental Specialist III  
Hazardous Waste Regulation

Subject: Notice of Delay to Initiate Operation of Active Remediation System  
Safety-Kleen Systems, Inc. -- Medley, Florida  
EPA ID No. FLD 984 171 694; Permit No. 56019/HO/006

Dear Mr. Russell:

For the above referenced Safety-Kleen (S-K) facility, and in accordance with Conditions I.8.a and I.8.b of the facility permit, this letter provides notice of delay and anticipated non-compliance with the schedule to Initiate Operation of Active Remediation System. This submittal includes one hard copy and one electronic copy, in accordance with permit Conditions I.15.a and I.16.

The Remedial Action Plan (RAP) for this facility was effectively approved on February 9, 2011 (date of issuance of permit modification). Pursuant to Table A in Chapter 62-780, F.A.C., the schedule to Initiate Operation of Active Remediation System is 120 days after RAP approval, which is June 9, 2011. The facility will be unable to achieve that compliance date due to permitting delays associated with the Town of Medley. The following is a brief history of the activities performed, and the status of the system installation and permitting through the Town of Medley.

On December 28, 2010, ECT oversaw the installation of four air-sparging remediation wells as specified in the approved RAP. The remediation piping connecting the air-sparging wells was completed by ECT's subcontractor EWE with ECT oversight on January 19 and 20, 2011. While on site, EWE subcontracted with Universal World Construction (UWC), a local general contractor, for the installation of a concrete pad for the remediation skid, the electrical service to the remediation skid, permitting through the Town of Medley, and various other services.

Delivery, installation, and connection of the remedial equipment was completed on February 8, 2011.

On February 18, 2011, UWC commenced work on the electrical hookup and requested a copy of the plans and specifications for use in applying for the electrical permit. On March 3, 2011, UWC received the electrical permit. Electrical connection of the remedial equipment was completed on March 14, 2011.

On March 12, 2011, as requested by the Town of Medley, UWC sought to gain an approval letter for the remedial system from Miami-Dade County Environmental Resource Management (DERM).



On March 21, 2011, UWC informed Tom Twitmyer with EWE that the Town of Medley will require a mechanical permit. EWE sent UWC a copy of the RAP. Then on April 11, 2011, EWE sent UWC a copy of the Florida Department of Environmental Protection (FDEP) RAP approval letter in order to demonstrate that the remedial system had the proper approval.

Because the Town of Medley continued to request DERM approval, Tom Twitmyer with EWE sent an email on April 26, 2011 to the Town of Medley building department explaining that the remedial system was approved by the FDEP and is under FDEP jurisdiction and not DERM. On April 29, 2011, EWE received verbal confirmation that the Town of Medley accepts the FDEP RAP approval and that the mechanical permit process can move forward.

On May 18, 2011, EWE authorized Kandra's Construction and Management, Inc. (Kandra) to procure the mechanical permit. Kandra submitted the mechanical/building permit application on May 23, 2011. ECT is currently awaiting permit issuance which is expected on or about June 6, 2011 when Kandra has a meeting scheduled with the Town of Medley. Soon thereafter, the Town of Medley will perform an onsite final inspection, which is expected to result in final approval for systems operation.

S-K has been diligent in these efforts, and desires to initiate systems operation as soon as possible. We also look forward to completing the site remediation in a timely manner.

If you have any questions, please call me at (847) 468-6733. Thank you.

Sincerely,

Robert A. Schoepke, P.G.  
Director – Remediation

cc: Jeff Curtis / S-K Compliance  
Larry Rodriguez / S-K facility manager  
Rick Stebnisky / ECT  
Mario Farrulla, P.E., (electronic copy)  
Project File