

Thursby, Kim

From: Blevins, Kirk [kirk_blevins@golder.com]
Sent: Tuesday, August 23, 2011 8:28 AM
To: Epost HWRS
Subject: Liquid Environmental Solutions (LES);FLD 981 928 484;RCRA Tank Closure and Solid Waste Management Units (SWMUs),Confirmatory Sampling Report Dated July 13, 2011.

Received

Liquid Environmental Solutions (LES);FLD 981 928 484;RCRA Tank Closure and Solid Waste Management Units (SWMUs),Confirmatory Sampling Report Dated July 13, 2011.

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

Work Safe, Home Safe

This email transmission is confidential and may contain proprietary information for the exclusive use of the intended recipient. Any use, distribution or copying of this transmission, other than by the intended recipient, is strictly prohibited. If you are not the intended recipient, please notify the sender and delete all copies. Electronic media is susceptible to unauthorized modification, deterioration, and incompatibility. Accordingly, the electronic media version of any work product may not be relied upon.

Please consider the environment before printing this email.

Thursby, Kim

From: Epost HWRS
Sent: Tuesday, August 23, 2011 8:14 AM
To: 'kirk_blevins@golder.com'
Cc: Bahr, Tim; 'Jim_Oliveros@golder.com'; Patel, Ashwin; 'tommy.dudley@liquidenviro.com'; 'tomdudley44@gmail.com'; Holmes, Georgiana; Perry, Jenna D.; Echevarria, Edgar; 'knight.karen@epamail.epa.gov'; 'Patrick.Reilly@liquidenviro.com'; Kothur, Bheem; Tripp, Anthony
Subject: Liquid Environmental Solutions (LES);FLD 981 928 484;RCRA Tank Closure and Solid Waste Management Units (SWMUs),Confirmatory Sampling Report Dated July 13, 2011.
Attachments: 8-23-11-Liquid Environmental Solutions LES Closure Report Response.Receipt.pdf

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



Florida Department of Environmental Protection

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

August 23, 2011

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinvard Jr.
Secretary

SENT VIA E-MAIL

Kirk_Blevins@golder.com

Mr. Kirk A. Blevins, CHMM
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 Report Dated July 13, 2011.

Dear Mr. Blevins:

The Florida Department of Environmental Protection (FDEP) has completed its review of the facility confirmatory sampling report dated July 13, 2011 related to Resource Conservation Recovery Act (RCRA) Tank Closure and Solid Waste Management Units for the Liquid Environmental Solutions (f.k.a. Industrial Water Services) facility. All eight (8) RCRA above ground storage tanks physical closure can be accepted contingent upon entry into a consent order to address contamination at the facility. The review comments are enclosed in an attachment.

A meeting date of September 12, 2011 has been scheduled in Tallahassee to discuss the impacted soils and groundwater and the appropriate mechanism or instrument to remediate the concerned contaminants.

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

August 23, 2011

Page Two

BK/

Attachment

cc: James P. Oliveros, Golder Associates, Inc., Jim_Oliveros@golder.com
Ashwin Patel, DEP/Jacksonville, ashwin.patel@dep.state.fl.us
Tommy Dudley, Jr, tomdudley44@gmail.com
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
Patrick Reilly, LES/Jacksonville, patrick.reilly@liquidenviro.com

ENCLOSURE
Liquid Environmental Solutions, LLC
EPA I.D. No.: FLD 981 928 484; Permit No.: 72815-HO-009
August 22, 2011

GENERAL COMMENTS:

1. The report must be certified, signed and sealed by a P.E. or P.G. as appropriate. Please resubmit the properly sealed certification page.
2. The soils and groundwater are impacted at the site and further assessment is necessary and appropriate.
3. All eight (8) RCRA above ground storage tanks physical closure can be accepted conditional upon entry into an appropriate mechanism or instrument to remediate the concerned areas. A face to face meeting has been set for September 12, 2011 to discuss the impacted soils and groundwater.

SPECIFIC COMMENTS:

4. Section 2.4.2-Groundwater Flow Determination, Top of Casing Survey: This Section refers to an "arbitrary datum" at the facility. Then Table 6 refers to a "TOC Elevation" as (ft NGVD), which is not an arbitrary datum. Which is correct? Please review and revise as appropriate.
5. Table 5, refers to (ftbs)-feet below ground surface for the Screened Interval. There is no ground surface elevation. There is no stick-up above ground surface information. Please review the Table and revise as appropriate.
6. Table -2, Soil Analytical Summary-Organic Constituents: In Soil Boring SB-2-1, the highest concentration of TRPH is 10,200 mg/kg which is above the Leachability Groundwater criteria of 340 mg/kg.
7. Table -2, SB-3-3, the highest concentration of benzene is 0.00748 mg/kg which is above the Leachability Criteria.
8. Table -7, Groundwater Analytical Summary-Inorganic Constituents: SB-7-GW, the highest concentration of Arsenic is 110 µg/l which is above the GCTL of 10 µg/l.
9. Table -8, Groundwater Analytical Summary-Organic Constituents: In SB-5-GW, the highest concentration of MTBE is 74.3 µg/l which is above the GCTL of 20 µg/l.