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RCRA

August 30, 2011

SEP 01 2011

103-82514

Mr. Bheem Kothur, PE
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Hazardous Waste Regulation

Received

SEP 01 2011

BSHW

**RE: LIQUID ENVIRONMENTAL SOLUTIONS 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
CONFIRMATORY SAMPLING REPORT
DATED JULY 13, 2011**

Dear Mr. Kothur:

On behalf of Liquid Environmental Solutions (LES), Golder Associates Inc. (Golder) is pleased to provide the following responses to the Florida Department of Environmental Protection's (FDEP's) comments concerning the RCRA Tank Closure and Solid Waste Management Units Confirmatory Sampling Report at the above referenced site. Each response follows the original FDEP comment provided in bold text below.

GENERAL COMMENTS

Comment 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.

Response 1: Golder has revised page 10 of the report and is attached.

Comment 2: The soils and groundwater are impacted at the site and further assessment is necessary and appropriate.

Response 2: Impacted media will be discussed at our upcoming meeting on September 12, 2011.

Comment 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 soil and groundwater.

Response 3: Impacted media will be discussed at our upcoming meeting on September 12, 2011.

SPECIFIC COMMENTS

Comment 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.

Response 4: All Top of Casing elevations are base on an arbitrary datum at the facility. Table 6 has been revised and is attached.



Comment 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.

Response 5: Table 5 is correct for the screened interval. Each interval is measured from the ground surface to the bottom of the screened interval not from a specific ground elevation. Table 5 was revised to reflect approximate stick-up lengths and is attached.

Comment 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.

Response 6: Agreed.

Comment 7: Table-2, SB-3-3, the highest concentration of benzene is 0.00748 mg/kg which is above the Leachability Criteria.

Response 7: Agreed.

Comment 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.

Response 8: Agreed.

Comment 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.

Response 9: Agreed.

If you have any questions or require additional information, please do not hesitate to call us at (904) 363-3430.

Sincerely,

GOLDER ASSOCIATES INC.



Kirk A. Blevins, CHMM
Project Scientist and Geochemist



James P. Oliveros, PG
Senior Consultant and Principal

cc: Patrick Reilly – Liquid Environmental Solutions, Inc.
Ashwin Patel – Florida Department of Environmental Protection - Jacksonville
Tommy Dudley – Industrial Water Services, Inc.
Karen Knight – U.S. Environmental Protection Agency

KAB/ams

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5.0 PROFESSIONAL CERTIFICATION

This is to certify that the interpretations of geology in this report have been examined by me, and the interpretations conform to sound geologic principles.

GOLDER ASSOCIATES INC.

Blake T. Walcott

Tanel Esin Andry, PE
Certifying Engineer

Kirk A. Blevins

Kirk A. Blevins, CHMM
Project Manager

James P. Oliveros

James P. Oliveros, PG
Senior Consultant and Principal
Florida Professional Geologist No. 1173

7/13/11

Date

TEA/JPO/ams

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**TABLE 5
WELL CONSTRUCTION SUMMARY**

**Liquid Environmental Solutions
1640 Tallyrand Avenue
Jacksonville, Florida**

Well Number	Date Installed	Installation Method	Top of Casing Elevation	A/G Riser Length, if Applicable	Total Well Depth (feet)	Screened Interval (fbgs)	Well Diameter (inches)	Lithology of Screened Interval
MW-1	2/91	Unknown	11.05	3	20	10-20*	2	Unknown
MW-2	2/91	Unknown	8.28	3	20	10-20*	2	Unknown
PZ-1	3/5/2010	HA	10.81	1	10	5-10	1	Fine Sand
PZ-2	4/12/2011	DPT	10.19	1	15	4-14	1	Fine Sand
PZ-3	4/12/2011	DPT	9.73	1	15	4-14	1	Fine Sand
SB-4	4/12/2011	DPT	9.29	1	15	4-14	1	Fine Sand
SB-5	4/12/2011	DPT	9.36	1	15	4-14	1	Fine Sand
SB-6	4/12/2011	DPT	9.37	1	15	4-14	1	Fine Sand
SB-7	4/12/2011	DPT	9.49	1	15	4-14	1	Fine Sand

Notes:
fbgs = Feet Below Ground Surface
NS = Not Surveyed
* Assumed

DPT = Direct Push Technology
HA = Hand Auger
NM = not measured

Checked by: KAB
Reviewed by: JPO



**TABLE 6
GROUNDWATER ELEVATION SUMMARY**

**Liquid Environmental Solutions
1640 Tallyrand Avenue
Jacksonville, Florida**

Well ID	TOC Elevation (ft)	4/12/2011	
		Groundwater Level (ft BTOC)	Groundwater Elevation (ft)
PZ-1	10.81	7.01	3.80
PZ-2	10.19	6.43	3.76
PZ-3	9.73	6.43	3.30
MW-1	11.05	7.38	3.67
MW-2	8.28	5.35	2.93
SB-4	9.29	6.55	2.74
SB-5	9.36	6.61	2.75
SB-6	9.37	6.59	2.78
SB-7	9.49	6.45	3.04

Notes:
 ft = Elevation in feet above arbitrary datum at site
 ft BTOC = feet below top of casing
 NI = Not installed
 NM = Not Measured
 TOC = Top of Casing

Checked by: KAB
 Reviewed by: JPO

