

Thursby, Kim

From: Schoepke, Robert [Robert.Schoepke@safety-kleen.com]
Sent: Wednesday, March 07, 2012 1:52 PM
To: Epost HWRS
Subject: RE: Safety-Kleen Systems, Inc.-Medley; FLD 984 171 694; Second Remedial Action Status Report, Safety-Kleen Systems, Inc., Medley, Florida dated February, 2012

Message received.

From: Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]
Sent: Wednesday, March 07, 2012 12:18 PM
To: Schoepke, Robert
Cc: Bahr, Tim; Coates, John; Curtis, Jeff; Holmes, Georgiana; Kantor, Karen E.; RStebnisky@ectinc.com; Winston, Kathy; Russell, Merlin; Tripp, Anthony
Subject: Safety-Kleen Systems, Inc.-Medley; FLD 984 171 694; Second Remedial Action Status Report, Safety-Kleen Systems, Inc., Medley, Florida dated February, 2012

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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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

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Tallahassee, Florida 32399-2400

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Secretary

March 7, 2012

SENT VIA E-MAIL

Robert.Schoepke@safety-kleen.com

Mr. Bob Schoepke
Safety-Kleen Systems, Inc.
1502 East Villa Street, 2nd Floor
Elgin, Illinois 60120

Re: Safety-Kleen Systems, Inc. FLD 984 171 694, Operating Permit 56019/HO/006,
Second Remedial Action Status Report, Safety-Kleen Systems, Inc., Medley, Florida dated
February, 2012

Dear Mr. Schoepke:

Except for two comments pertaining to the proposed soil excavation, the Remedial Action Status Report referenced above is acceptable and supports the proposal to submit a Site Rehabilitation Completion Report for the groundwater remediation. As you know, your Post Active Remediation Plan (PARM) was approved in my earlier letter dated February 15, 2012.

You notified us on September 8, 2011 of the sampling scheduled for September 21. You notified us on December 12, 2011 of the sampling scheduled for December 21. You notified us on January 10, 2012 of the soil sampling scheduled for January 18, 2012. On January 17, 2012, you were given an extension until February 22 to submit the RASP. Your document was received on February 17.

In this status report, your proposal to change the final remedy for soils (excavation) is certainly acceptable. However, this change is considered a major modification to an approved remedy. This change will require public notice. The timing is such that the proposed remedy could be implemented now, at your own risk, with a Site Rehabilitation Completion Order (SRCO) or equivalent included with, or as part of, your renewal permit scheduled to be processed later this calendar year.

Because this excavation is limited in scope, soils are non-hazardous and the remedy is presumptive, a detailed plan is not needed for excavation; however, the details of the excavation must be submitted with your Site Rehabilitation Completion Report (SRCR).

There is an inconsistency in your report concerning the depth to groundwater. This is mentioned because your summary and recommendation section proposes soil excavation to approximately 2 to 2.5' bls. On page 1-2, paragraph 2 your report states that the average depth to water is about 2' bls. However, the depth to groundwater (DTW) is noted elsewhere as:

✚ Page 2-1, paragraph 2, June 21, 2011-The DTW "...averaged 4.0 ft bls in the shallow wells."

March 7, 2012


- ✚ Page 2-2, paragraph 1, September 21, 2011-"The DTW averaged 3.85 ft bls in the shallow wells."
- ✚ Page 2-3, paragraph 2 December 21, 2011-"The DTW averaged 3.83 ft bls in the shallow wells."

In fact, your Table 1 nicely summarizes the DTW that has generally been on the order of 3-4' bls except at MW-3. At the time of excavation, Safety Kleen can choose to excavate to the water table without any sampling from the bottom of the excavation or take confirmatory samples for arsenic in the remaining soils at the bottom of the excavation.

Finally, the pre-remediation 95% UCL of 2.43 mg/kg was correctly calculated. However, the virtual remediation was not. When the excavated points are removed from the analysis, they should be replaced with the average arsenic concentration of the clean fill¹. In your calculations, no average value for arsenic in the clean fill value was used. For review purposes, the five excavated areas were replaced with an average arsenic concentration of 0.5 mg/kg. The recalculation results in a 95% UCL of 1.4 mg/kg, which is well below the residential criteria (our calculations are attached). I would recommend locating a source of backfill and determining its arsenic concentration (either through sampling or information from the vendor), and re-running the FL UCL post-excavation data to determine areas that will need to be excavated.

As always, if you have questions, please feel free to contact me at (850) 245-8796 or e-mail me at merlin.russell@dep.state.fl.us.

Sincerely,



Merlin D. Russell Jr., Professional Geologist II
Hazardous Waste Regulation

MR/mdr

Attachment (.xls spreadsheet)

e-mailed w/attachment to:

Jeff Curtis, Safety Kleen, Jeff.Curtis@safety-kleen.com

Georgiana Holmes, Georgiana.Holmes@dep.state.fl.us

Karen Kantor, FDEP WPB, Karen.E.Kantor@dep.state.fl.us

Rick Stebnisky, ECT, RStebnisky@ectinc.com

Kathy Winston, FDEP WPB, Kathy.Winston@dep.state.fl.us

¹ See Appendix D of the Technical report, pages 125-127

[http://www.dep.state.fl.us/waste/quick_topics/publications/wc/FinalGuidanceDocumentsFlowCharts_April2005/TechnicalReport2FinalFeb2005\(Final3-28-05\).pdf](http://www.dep.state.fl.us/waste/quick_topics/publications/wc/FinalGuidanceDocumentsFlowCharts_April2005/TechnicalReport2FinalFeb2005(Final3-28-05).pdf)