Digitally signed by Kim Thursby
DN: cn=Kim Thursby, o=Florida DEP, ou=Hazardous Waste Regulation Section, email=kim.thursby@dep.state.fl.us, c=US
Date: 2012.10.11 12:58:35 -04'00'

Thursby, Kim

From: Curtis, Jeff [Jeff.Curtis@safety-kleen.com]
Sent: Thursday, October 11, 2012 11:12 AM
To: Russell, Merlin
Cc: Thursby, Kim
Subject: RE: Safety-Kleen Systems, Inc.-Tampa;FLD 980 847 271;Site Assessment Report dated August 2012

Received.

Jeff Curtis EHS Manager | Safety-Kleen | Boynton Beach, FL | jeff.curtis@safety-kleen.com
561.600.3076 (o) | 561.523.4719 (c) | 561.731.1696 (f) | safety-kleen.com

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From: Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]
Sent: Thursday, October 11, 2012 9:12 AM
To: Curtis, Jeff
Cc: Thursby, Kim
Subject: FW: Safety-Kleen Systems, Inc.-Tampa;FLD 980 847 271;Site Assessment Report dated August 2012

Jeff, please let Kim know if you received this. Thanks.

merlin

From: Epost HWRS
Sent: Friday, September 28, 2012 8:25 AM
To: Jeff.Curtis@Safety-Kleen.com
Cc: Bahr, Tim; Goddard, Charles; Dregne, James; Honey, Kelly; Knauss, Elizabeth; Robert.Schoepke@safety-kleen.com; Sellers, Robert; RStebnisky@ectinc.com; Russell, Merlin; Tripp, Anthony
Subject: Safety-Kleen Systems, Inc.-Tampa;FLD 980 847 271;Site Assessment Report dated August 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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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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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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Florida Department of Environmental Protection

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

Rick Scott
Governor

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Lt. Governor

Herschel T. Vinyard Jr.
Secretary

September 28, 2012

Sent Via Email
Jeff.Curtis@safety-kleen.com

Mr. Jeff Curtis
Safety-Kleen Systems, Inc.
5309 24th Avenue South
Tampa, Florida 33619

Subject: Safety-Kleen Systems, Inc. FLD 980 847 271, Operating Permit No. 34744-HO-007, *Site Assessment Report* dated August 2012

Dear Mr. Curtis:

The Site Assessment Report (SAR) for the assessment associated with the septic tank is approved with certain clarifications and comments below in Attachment A. In addition, your Monitoring Only Plan (MOP) is approved pending the inclusion of a few comments or clarifications also included in Attachment A. If you have any questions, please call me at 850-245-8796 or merlin.russell@dep.state.fl.us

Sincerely,

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

MR/mdr
Attachment
cc via e-mail w/attachment:
Jim Dregne, FDEP Tampa, James.Dregne@dep.state.fl.us
Kelly Honey, FDEP Tampa, Kelly.Honey@dep.state.fl.us
Beth Knauss, FDEP Tampa, Elizabeth.Knauss@dep.state.fl.us
Bob Schoepke, Safety-Kleen, Robert.Schoepke@safety-kleen.com
Bob Sellers, FDEP Tampa, Robert.Sellers@dep.state.fl.us
Rick Stebnisky, ECT, RStebnisky@ectinc.com

ATTACHMENT A
Safety-Kleen Systems, Inc., Tampa
Site Assessment Report dated August 2012

1. (6-8/3) The reporting of 3-methylphenol and 4-methylphenol together is acceptable; however, when combined, the lower of the two GCTLs must be applied to the methylphenols rather than the addition of the two GCTLs as applied in the report. More explicitly, the 3.5 µg/l GCTL for 4-methylphenol applies to the combined concentrations.

2. (6-11/the table) The SAR should have included ASI's March 7, 2012 lab report that included iron and manganese results for the septic tank water. However, the report was submitted informally as a part of earlier discussions about site assessment, so I am placing the lab report into OCULUS.

3. (6-11/last paragraph) Though we agree that the source of the onsite iron and manganese contamination at Safety-Kleen is unlikely from the septic tank, information in the SAR suggests that the source of the iron and manganese is related to fill material used in SWMU-11, the Old Dumping Ground. The original SWMU data sheet[1] indicates that prior to 1986, this area was used for dumping household and office trash including used furniture, washing machines, tires and other appliances.

Although the assessment wells were clearly placed in previously disturbed areas of the property, and probably monitor fill material rather than undisturbed soils, this may not be the case for MW-5 considering the following:

1. The location of MW-5 is at or near the edge of the former pond. With a road along the northern and eastern edges of the pond (see 1976 aerial), the edge of the pond would have been some distance from the roads, and sloped in order to maintain stability of the roads.
2. The Boring Log for MW-5 only reports debris (plastic and brick) within the top three feet. It is possible that the lower portion of the well, at least the screened portion, was placed in undisturbed soils.
3. The Net OVA readings are much lower than the other surficial wells.
4. Groundwater quality is different.

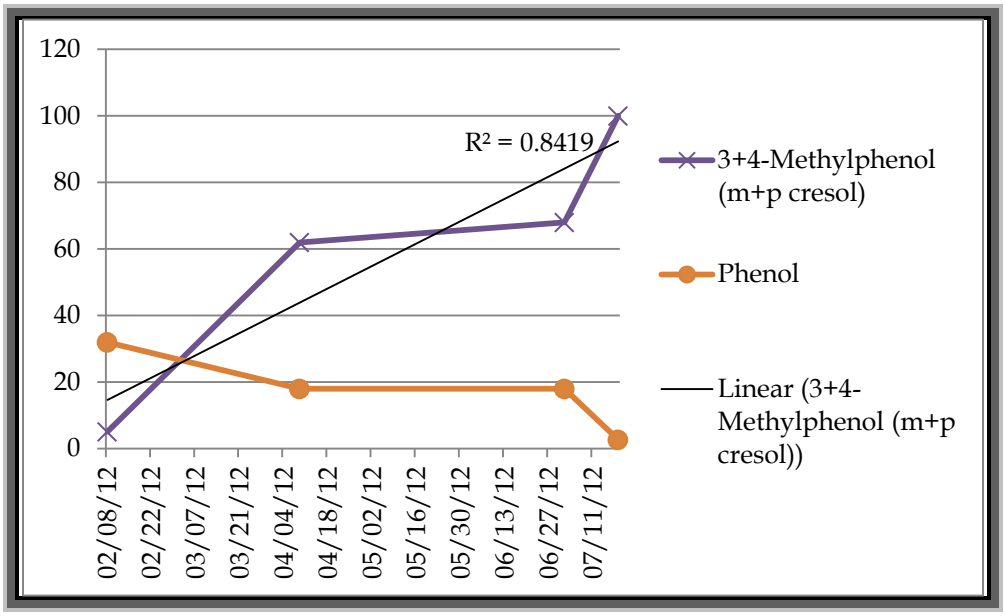
It appears that the backfill has impacted groundwater quality. I will review this issue separately after reviewing previous documents associated with SWMU-11 assessment.

4. (6-12/1) The Poor Quality (PQA) demonstration is not accepted. If you continue to pursue a PQA, you may do so. However, the PQA demonstration will require an adequate site-specific demonstration, including appropriate *natural* background well locations and supporting data. Although well MW-5 might be screened within undisturbed materials as discussed in comment 3, it is probably impossible to ever verify. Ultimately, a PQA demonstration will need to be made based upon groundwater data representative of natural, background conditions.

[1] December 1989 *Interim RCRA Facility Assessment* prepared for EPA by A.T. Kearney, Inc.

If you successfully demonstrate a poor quality aquifer, Safety-Kleen will still be required to record a restrictive covenant on the property. Ultimately, a PQA may not really afford Safety-Kleen any additional relief. In reality, the Department does not see too many sites for which the PQA makes a significant difference. By the way, there are other cleanup sites in the near vicinity that are contemplating a PQA. I am closely working with our district waste cleanup staff to ensure consistency and fairness in evaluating and approving any PQA demonstrations.

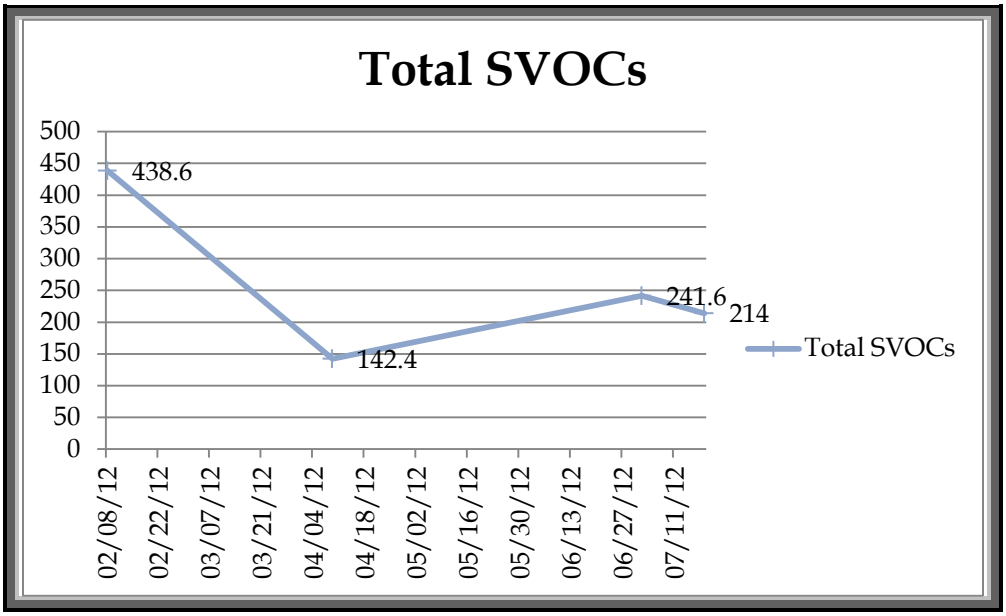
5. (8-3/Section 8.2 Recommendations) In evaluating potential Risk Management Options under rule 62-780.680, F.A.C., RMOII appears to be the most likely option at this point as noted on the top of page 4-3. One of the criteria is to demonstrate that the plume is stable or shrinking. There are insufficient data to make this demonstration at this point (simply due to the few number of sampling events) but the SAR has correctly proposed additional sampling. One area to focus on is MW-2 and the methylphenols. Although the population is small, the data show an increasing trend in 3+4-methylphenol:



With the removal of the wastes from the septic tank and the continuing source removed[2] (introduction of chemicals into the septic tank system through various sinks/drains), a decrease in all contaminants from this former practice would be expected.

6. (8.2.1 Natural Attenuation Monitoring Plan) The Monitoring Only Plan (MOP) is proposed for releases of organic contaminants from the former septic tank area. One could argue that the increase in 3+4-methylphenol might preclude meeting one criterion for proposing NAM (specifically, paragraph 62-780.690(1)(e), F.A.C.); however, there has been an overall decrease in contamination based upon the total SVOCs. Continued monitoring may reveal otherwise:

[2] As of September 19, Safety-Kleen had not yet connected to the sewer system.



Therefore, the MOP is approved pending the following comments or clarifications:

1. As mentioned earlier, the reporting of 3-methylphenol and 4-methylphenol together is acceptable; however, the lower of the two GCTLs must be applied to the combined phenols. More explicitly, the 3.5 µg/l GCTL for 4-methylphenol would apply to the combined concentrations in this situation [and the Natural Attenuation Default Concentration (NADC) will be 35 µg/l].
2. Aside from indicators measured during well purging, SVOCs using Method 8270 should continue to be monitored. Continue to report (summarize in tabular form) all detected constituents as you have done for the SAR. These data may continue to support that overall contamination is decreasing.
3. We concur that a *minimum* of two additional quarters are required. In the event that GCTLs are not met after these two quarters, quarterly monitoring will need to continue until GCTLs are met or to demonstrate that the plume is stable or shrinking as discussed earlier.
4. TPOC wells are not needed for onsite contamination. Wells MW-3 and MW-4 will be considered the point of compliance.
5. We suggest that the annual review discussed at the top of page 5 be done after the January 2013 sampling event. From a practical standpoint, the only ongoing post septic tank cleanout remedial mechanism has been natural attenuation. With the removal of source material in early 2012, it would be appropriate to complete an annual review about a year later.

7. Similar to Comment #1, adding the SCTLs for 3-methylphenol and 4-methylphenol together in Table 6.1 is inappropriate for application of FDEP SCTLs (and probably with the EPA CTLs as well). The lower SCTL of the two SCTLs, in this case, the 4-methylphenol SCTL would be applicable.