

Thursby, Kim

From: Curtis, Jeff <Jeff.Curtis@safety-kleen.com>
Sent: Wednesday, November 05, 2014 3:47 PM
To: Epost HWRS (Shared Mailbox)
Subject: RE: Safety-Kleen Systems, Inc.-Tampa; FLD 980 847 271; Site Rehabilitation Completion Order (SRCO) Without Controls

Received.

Thank you,

Jeff Curtis EHS Manager | Safety-Kleen | A Clean Harbors Company | Boynton Beach, FL | jeff.curtis@safety-kleen.com
561.738.3026 (o) | 561.523.4719 (c) | 561.731.1696 (f) | safety-kleen.com



Safety Starts With Me! Live it 3-6-5

From: Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)
Sent: Wednesday, November 05, 2014 12:55 PM
To: Curtis, Jeff
Cc: Bahr, Tim; Baker, Bryan; 'davidn.arnold@watermatters.org'; 'bastek.brian@epa.gov'; Knauss, Elizabeth; Schoepke, Robert; 'RStebnisky@ectinc.com'; Russell, Merlin; Tripp, Anthony; Kothur, Bheem
Subject: Safety-Kleen Systems, Inc.-Tampa; FLD 980 847 271; Site Rehabilitation Completion Order (SRCO) Without Controls

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting 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.

Bryan Baker, P.G.
Program Administrator
Permitting & Compliance Assistance Program
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us





**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

November 05, 2014

Sent Via E-mail

Jeff.Curtis@safety-kleen.com

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

Subject: **Site Rehabilitation Completion Order (SRCO) Without Controls**
Safety-Kleen Systems, Inc.
5309 24th Avenue South, Tampa, Florida 33619
FLD 980 847 271
Operating Permit No. 34744-HO-007

Dear Mr. Curtis:

The Department of Environmental Protection, Hazardous Waste Program and Permitting Section has reviewed the *Natural Attenuation Monitoring Report #8 and Site Rehabilitation Completion Report with a No Further Action Proposal* dated August 26, 2014, including the proposal for No Further Action (NFA) Without Controls contained therein, that was prepared by Environmental Consulting & Technology, Inc. for the Safety-Kleen Systems, Inc. located at 5309 24th Avenue South, Tampa, Florida.

1. Maps showing the location of Safety-Kleen Systems, Inc. and the former location of the "contaminated site", i.e., solid waste management unit number 21 (SWMU-21), for which this Order is being issued are attached as Exhibits 1 and 2.
2. The contamination resulted from discharges to a septic tank system that was unidentified, as required, in the facility's Hazardous Waste Permit application. Analysis of septic tank contents and subsequent groundwater monitoring identified contaminants consisting of several volatile and semi-volatile organic compounds and metals. The complete list is located in Safety-Kleen's Confirmatory Sampling Report dated December 16, 2011. The discharges to the septic tank system may have resulted from the use of a former sink in the South Container Storage Building. The sink was removed sometime prior to February 2012 as a short-term solution. The septic tank was cleaned out on January 31, 2012. The septic tank was taken off line on April 22, 2014 after hookup to a municipal sewer system.

3. The NFA Proposal is supported by earlier submittals, prepared pursuant to Hazardous Waste Operating Permit 34744-HO-007, including, but not limited to:
 1. *Confirmatory Sampling Report* dated December 16, 2011
 2. *Septic System Plan/Report* dated February 6, 2012.
 3. e-mail notification that the septic tank was taken off line on April 22, 2014 dated May 6, 2014.
 4. *Natural Attenuation Monitoring Report #8 and Site Rehabilitation Completion Report with a No Further Action Proposal* dated August 26, 2014
4. Based on the documentation submitted with the NFA proposal and the above-referenced documents, the Department has reasonable assurance that Safety-Kleen Systems, Inc. has met the criteria in Chapters 62-730 and 62-780, Florida Administrative Code (F.A.C.), and has met the corrective action requirements of Hazardous Waste Operating Permit 34744-HO-007 for SWMU-21.
5. The submittals indicate that soil and groundwater contaminant concentrations are below the applicable Cleanup Target Levels (CTLs) as adopted in Chapter 62-777, F.A.C. (Effective date 4-17-2005). The attached table (Exhibit 3), incorporated by reference herein, includes information regarding the contaminants, the affected media, and applicable CTLs for the contaminated site that is the subject of this Order.
6. Therefore, Safety-Kleen Systems, Inc. has satisfied the site rehabilitation requirements for the above-referenced contaminated site and is released from any further obligation to conduct site rehabilitation at the contaminated site except as set forth below.
7. Safety-Kleen Systems, Inc. is required to properly abandon all monitoring wells within 60 days of receipt of this Order. The monitoring wells must be plugged and abandoned in accordance with the requirements of Subsection 62-532.500(4), F.A.C.
8. Safety-Kleen Systems, Inc. is required to attach Exhibit 4 to your Hazardous Waste Operating Permit 34744-HO-007. These tables must be attached to your permit, and become part of it.
9. In accordance with Section 376.30701(4), F.S., upon completion of site rehabilitation, additional site rehabilitation is not required unless it is demonstrated that:
 - a. Fraud was committed in demonstrating site conditions or completion of site rehabilitation;
 - b. New information confirms the existence of an area of previously unknown contamination which exceeds the site-specific rehabilitation levels established in accordance with subsection (2) [of Section 376.30701, F.S.], or which otherwise poses the threat of real and substantial harm to public health, safety, or the environment;

- c. The remediation efforts failed to achieve the site rehabilitation criteria established under this Section [376.30701, F.S.];
 - d. The level of risk is increased beyond the acceptable risk established under subsection (2) [of Section 376.30701, F.S.] due to substantial changes in exposure conditions, such as a change in land use from nonresidential to residential use. Any person who changes the land use of the site, thereby causing the level of risk to increase beyond the acceptable risk level, may be required by the department to undertake additional remediation measures to ensure that human health, public safety, and the environment are protected consistent with this section; or
 - e. A new discharge of pollutants or hazardous substances occurs at the site subsequent to the issuance of a "No Further Action" order or a "Site Rehabilitation Completion" order [i.e., this Order] associated with the original contamination being addressed pursuant to this section [376.30701, F.S.]
10. Any party to this Order has the right to seek judicial review of it under section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the Agency Clerk of the Department in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within 30 days after this Order becomes final. This Order is final and effective as of the date it is filed with the Clerk (see Filing and Acknowledgment on the last page of this Order).

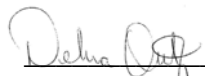
Sincerely,



Tim J. Bahr, Program Administrator
Permitting and Compliance Assistance Program
2600 Blair Stone Road, MS 4560
Tallahassee, FL 32399-2400

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk (or Deputy Clerk)

November 5, 2014

Date

Enclosures (Exhibits 1, 2, 3 and 4)

Mr. Jeff Curtis
November 05, 2014
Page 4 of 11

cc with enclosure:

David Arnold, Southwest Florida WMD, davidn.arnold@watermatters.org
Brian Bastek, EPA Region 4, bastek.brian@epa.gov
Beth Knauss, DEP Southwest District, Elizabeth.Knauss@dep.state.fl.us
Bob Schoepke, Safety-Kleen, Robert.Schoepke@safety-kleen.com
Rick Stebnisky, ECT, RStebnisky@ectinc.com

Exhibit 1 Location of the Safety-Kleen Systems, Inc.



Exhibit 2 Former location of SWMU-21

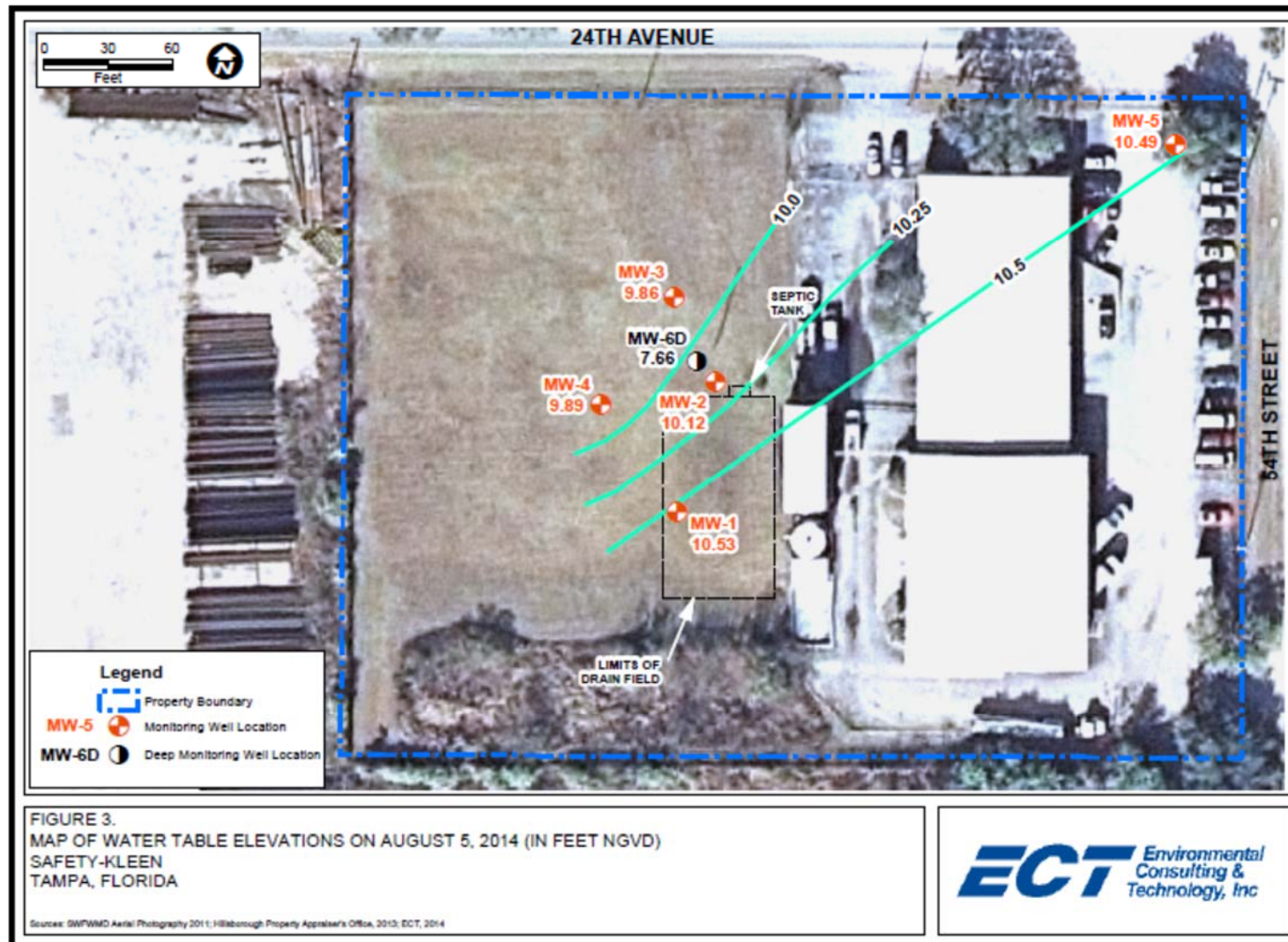


Exhibit 3 Contaminants, Affected Media, and Applicable CTLs

Well No.	Date	Benzoic Acid	1,4-Dichloro-benzene	Diethyl phthalate	3+4-Methylphenol (m+p cresol)	Naphthalene	Phenol
GCTL→		28,000	75	5,600	3.5*	14	10*
MW-1	02/08/12	<3.0	<2.7	<3.8	6.6 J	<3.5	<2.8
	04/09/12	<2.9	<2.7	<3.7	<5.1	<3.5	<2.7
	07/19/12	<2.9	<2.7	<3.7	<5.1	<3.5	<2.7
MW-2	02/08/12	370	14	14	<5.1	<3.5	32
	04/09/12	52	<2.7	4.2 J	62	<3.5	18
	07/02/12	140	<2.8	9.1 J	68	<3.7	18
	07/19/12	100	<2.7	5.1 J	100	<3.5	<2.7
	10/16/12	<1.4	<2.8	4.6	19	<3.0	<1.8
	01/03/13	69	<3.0	4.0	32	<3.2	11
	04/03/13	<1.4	<3.0	<2.8	<3.1	<3.2	<1.9
	07/11/13	<1.4	<3.0	<2.8	<3.1	<3.2	<1.9
	10/09/13	<1.4	7.7 J	5.3 J	<3.1	<3.2	<1.9
	02/13/14	<5.2	<2.9	<2.9	<4.7	<2.6	<2.1
MW-2R	05/27/14	<5.2	<2.9	<2.9	<1.0	<2.6	<2.1
	08/05/14	<5.2	<2.9	<2.9	<3.5	<2.6	<2.1
MW-3	02/08/12	<2.9	<2.7	<3.7	<5.1	<3.5	<2.7
	04/09/12	<2.9	<2.7	<3.7	<5.1	<3.5	<2.7
	07/19/12	<2.9	<2.7	<3.7	<5.1	<3.5	<2.7
	10/16/12	<1.4	<2.8	<2.6	<2.9	<3.0	<1.8
	01/03/13	<1.4	<2.8	<2.9	<2.9	<3.0	<1.8
	04/03/13	<1.4	<2.8	<2.6	<2.9	<3.0	<1.8
	07/11/13	<1.4	<3.0	<2.8	<3.1	<3.2	<1.9
	10/09/13	<1.4	<3.0	<2.8	<3.1	<3.2	<1.9
	02/13/14	<5.2	<2.9	<2.9	<4.7	<2.6	<2.1
	05/27/14	<5.2	<2.9	<2.9	<1.0	<2.6	<2.1
	08/05/14	<5.2	<2.9	<2.9	<3.5	<2.6	<2.1

Exhibit 3 Contaminants, Affected Media, and Applicable CTLs (cont.)

Well No.	Date	Benzoic Acid	1,4-Dichloro-benzene	Diethyl phthalate	3+4-Methylphenol (m+p cresol)	Naphthalene	Phenol
GCTL→		28,000	75	5,600	3.5*	14	10
MW-4	02/08/12	<2.9	<2.7	<3.7	<5.1	<3.5	<2.7
	04/09/12	<2.9	<2.7	<3.7	<5.1	6.0 J	<2.7
	07/19/12	<2.9	<2.7	<3.7	<5.1	<3.5	<2.7
	10/16/12	<1.4	<2.8	<2.6	14	<3.0	<1.8
	11/06/12	<1.4	<3.0	<2.8	21	<3.2	<1.9
	01/03/13	<1.4	<2.8	<2.6	<2.9	<3.0	<1.8
	04/03/13	<1.4	<2.8	<2.6	<2.9	8.2 J	<1.8
	07/11/13	<1.4	<3.0	<2.8	5.3 J	<3.2	<1.9
	08/22/13	<1.4	<3.0	<3.0	<3.1	<3.2	<1.9
	10/09/13	<1.4	<3.0	<2.8	<3.1	<3.2	<1.9
	02/13/14	<5.2	<2.9	<2.9	<4.7	<2.6	<2.1
	05/27/14	<5.2	<2.9	<2.9	<1.0	<2.6	<2.1
	08/05/14	<5.2	<2.9	<2.9	<3.5	<2.6	<2.1
MW-5	02/08/12	<2.9	<2.7	<3.7	<5.1	<3.5	<2.7
	04/09/12	N/A	N/A	N/A	N/A	N/A	N/A
MW-6D	07/19/12	<2.9	<2.7	<3.7	<5.1	<3.5	<2.7
MW-7	05/27/14	<5.2	<2.9	<2.9	<1.0	<2.6	<2.1
	08/05/14	<5.2	<2.9	<2.9	<3.5	<2.6	<2.1

Units in µg/l

GCTL Groundwater Cleanup Target Level per Chapter 62-777, F.A.C.

BOLD Results exceed a Groundwater Cleanup Target Level (GCTL).

< Not detected at levels equal to or greater than the method detection limit.

J Estimated value, less than reporting limit but greater than method detection limit.

N/A Parameter not analyzed.

* Because meta-, and para-cresols were analyzed together, the lower GCTL, 3.5 µg/l for para-cresol, was used for the combined cresols.

Exhibit 4
Summary of Facility Sites (Solid Waste Management Units and Areas of Concern)

A.1. List of SWMUs/AOCs requiring Confirmatory Sampling:				
SWMU/AOC Number/Letter	SWMU/AO C Name	SWMU/AOC Comment and Basis for Determination	Dates of Operation	Potentially Affected Media
There are no units identified at this time as requiring Confirmatory Sampling				
A.2. List of SWMUs/AOCs requiring a Site Assessment (a/k/a RCRA Facility Investigation [RFI]) or a Risk Assessment:				
SWMU/AOC Number/Letter	SWMU/AOC Name	SWMU/AOC Comment	Dates of Operation	Potentially Affected Media
There are no units identified at this time requiring a Site Assessment (a/k/a RCRA Facility Investigation [RFI]) or a Risk Assessment				
A.3. List of SWMUs/AOCs requiring a Remedial Action Plan or Natural Attenuation with Monitoring Plan (a/k/a Corrective Measures Study [CMS]):				
SWMU/AOC Number/Letter	SWMU/A OC Name	SWMU/AOC Comment	Dates of Operation	Affected Media
There are no units identified at this time requiring a Remedial Action Plan or a Natural Attenuation with Monitoring Plan.				
A.4. List of SWMUs/AOCs <u>implementing</u> a Remedial Action Plan or Natural Attenuation with Monitoring Plan (a/k/a Corrective Measures Implementation Report [CMI]):				
SWMU/AOC Number/Letter	SWMU/A OC Name	SWMU/AOC Comment	Dates of Operation	Affected Media
There are no units identified at this time undergoing a Remedial Action Plan or a Natural Attenuation with Monitoring Plan.				

A.5. List of SWMUs/AOCs at which Site Rehabilitation Completion Determinations without controls have been made:			
SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA	Dates of Operation
SWMU-21	Septic Tank and Drainfield	<i>Natural Attenuation Monitoring Report #8 and Site Rehabilitation Completion Report with a No Further Action Proposal</i> dated August 26, 2014	1985-2014
A.6. List of SWMUs/AOCs at which Site Rehabilitation Completion Determinations with controls have been made:			
SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA	Dates of Operation
There are no units identified at this time at which Site Rehabilitation Completion Determinations with controls have been made.			
A.7. List of SWMUs/AOCs Where No Further Action Determinations have been made based on no suspected or confirmed contamination:			
SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA	Dates of Operation
SWMU-1	Service Center Drum Storage Area and Associated Trench	Used for temporary storage of drums. RCRA Regulated Unit	1986-present
SWMU-2	Drummed Dry Cleaning and Paint Waste Unloading Dock	Loading Dock	1986-present
SWMU-3	Solvent Return Wet Dumpsters	Production Area. Part of a RCRA Permitted Unit	1986-present
SWMU-4	Spill Containment Area Below the Fill Shelters	Production Area. Part of a RCRA Permitted Unit	1986-present
SWMU-5	Drum Rinsing Area	Production Area. Part of a RCRA Permitted Unit	1986-present
SWMU-6	Waste Solvent Storage Tank	Temporary Storage. RCRA Regulated Unit	1986-present
SWMU-7	Stormwater Ditch	Earthen Drainage Ditch	1986-present
SWMU-8	Accumulation Center Drum Storage Area and Associated Trench	Used for temporary storage of drums. RCRA Regulated Unit	1986-present

SWMU-9	Drummed Waste Loading Docks	RCRA Facility Assessment and Sequent Inspections	1986-present
SWMU-10	Drummed Flammable Waste Storage Room	RCRA Facility Assessment and sequent Inspections	1986-present
SWMU-11	Old Dumping Ground	RCRA Facility Assessment and Sequent Inspections	1986
SWMU-12	Stormwater Retention Pond	RCRA Facility Assessment and Sequent Inspections	1986-present
SWMU-13	Antifreeze Tank	Facility Inspections following Installation	2001-2009
SWMU-14	Used Oil Filter Containers	Facility Inspections following Installation	2001-present
SWMU-15	Empty Used Oil Filter Containers	Facility Inspections following Installation	2001-present
SWMU-16	Fluorescent bulbs/bulbs & Mercury Device Storage Area	Identified through Part B renewal dated May 27, 2011	1996-present
SWMU-17	Non-Flammable Transfer Waste Area	Identified through Part B renewal dated May 27	1986-present
SWMU-18	Flammable Waste Transfer Area	Identified through Part B renewal dated May 27	1986-present
SWMU-19	Satellite Container Area	Identified through Part B renewal dated May 27	1986-present
SWMU-20	Less than 90-day Waste Storage Area	Identified through Part B renewal dated May 27	1986-present