



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

August 29, 2014

Mr. Tom Dudley
1640 Talleyrand Avenue
Jacksonville, Florida 32206
tomdudley44@gmail.com

**Re: Supplemental Site Assessment Report Addendum
LES/IWS - Talleyrand
1640 Talleyrand Avenue, Jacksonville, Florida 32206
Facility Site I.D. #COM_321171; Project I.D. 338853
Duval County – Waste Cleanup**

Dear Mr. Dudley:

The Florida Department of Environmental Protection (DEP) has completed review of the Supplemental Site Assessment Report Addendum dated May 5, 2014, prepared by Terra-Com Environmental Consulting, Inc. for the above referenced site. After reviewing the report, a conditional closure under Risk Management Option II may be possible, provided the actions need to address DEP following comments support the current information:

1. The arsenic contamination in the soil and groundwater at the site does not appear to have resulted from a discharge on the site. The property adjacent to and south of the LES site has historical documentation of arsenic in the soil and groundwater and adjacent site and is currently an active petroleum cleanup site. Based on historical maps of the LES site and the adjacent property, the LES site and adjacent property appears to have both been owned and operated by the Seaboard Coastline Railroad Company and had railroad spurs that traversed the properties. Therefore, DEP does not believe that additional delineation of arsenic is needed south of the LES site. Please note that if the arsenic in the groundwater will not be remediated, groundwater restrictions will be required for closure under a Risk Management Option II.
2. Before the LES site can qualify for a Risk Management Option II closure, the total recoverable petroleum hydrocarbons (TRPHs) and benzo(a)pyrene equivalents (BaPs) contamination in soil borings SB-2, SB-3, and SB-5 need to be addressed through excavation or engineering controls since the levels of TRPH and/or BaPs exceed the

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industrial soil cleanup target levels. Additionally, soil samples at the property boundary need to be sampled north of soil boring SB-2 for TRPH and BAPs, north of soil boring SB-3 for BaPs to demonstrate the soil cleanup target levels are met at the property boundary.

The above comments and the additional data to address them should be included in a Supplemental Site Assessment Report Addendum, signed and sealed by either a Florida licensed professional geologist or professional engineer, and provided to the DEP no later than November 30, 2014.

Please notify DEP in writing (via facsimile or e-mail) within five days prior to initiating any field activity. If you have any questions, please contact Merrilee Palcic at (904) 256-1544, via email at merrilee.l.palcic@dep.state.fl.us, or via facsimile (904) 256-1587.

Sincerely,



Richard S. Rachal III, P.G.
Program Administrator

RSR/mp/aw



c: Greg Self, gself@terra-comenv.com
Trey Mills, tmills@rtlaw.com