Kim Thursby Digitally signed by Kim Thursby Date: 2018.08.08 13:40:55 -04'00'

Thursby, Kim

From: Kurt Fogleman <kfogleman@perma-fix.net>
Sent: Monday, August 6, 2018 10:52 AM
To: Buselli, Bradley; kfogleman@perma-fix.com
Cc: ronie.rukab@aecom.com; Thursby, Kim
Subject: RE: Perma-Fix of Florida, Inc.; FLD 980 711 071;Site Assessment Report (SAR) dated May 3, 2018

Received

Thanks,
Kurt

From: Buselli, Bradley [mailto:Bradley.Buselli@dep.state.fl.us]
Sent: Monday, August 06, 2018 9:58 AM
To: kfogleman@perma-fix.com
Cc: ronie.rukab@aecom.com; Thursby, Kim
Subject: FW: Perma-Fix of Florida, Inc.; FLD 980 711 071;Site Assessment Report (SAR) dated May 3, 2018

Good Morning Kurt,

Please confirm receipt of the attached document as described below.

From: Thursby, Kim **On Behalf Of** Epost HWRS
Sent: Wednesday, July 25, 2018 12:29 PM
To: 'kfogleman@perma-fix.com' <kfogleman@perma-fix.com>
Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; Bland, Mike <Mike.Bland@dep.state.fl.us>; Fellabaum, Pamela <Pamela.Fellabaum@FloridaDEP.gov>; Palcic, Merrilee L. <Merrilee.L.Palcic@dep.state.fl.us>; 'ronie.rukab@aecom.com' <ronie.rukab@aecom.com>; Buselli, Bradley <Bradley.Buselli@dep.state.fl.us>
Subject: Perma-Fix of Florida, Inc.; FLD 980 711 071;Site Assessment Report (SAR) dated May 3, 2018

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.

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.
Environmental Administrator
Hazardous Waste Program & Permitting

Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

July 25, 2018

Mr. Kurt Fogleman,
Environmental, Health & Safety Manager
Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, FL 32653
kfogleman@perma-fix.net

RE: **Site Assessment Report (SAR)** dated May 3, 2018
Perma-Fix of Florida, Inc.; FLD 980 711 071
Operating Permit Number: 17680-011-HO

Dear Mr. Fogleman:

The Department has reviewed the above referenced report, which provides a summary of site assessment activities to further assess the potential extent of soil, sediment, surface water, and groundwater contamination detected during soil sampling related to the Roll-Off Box Fire Incident that occurred January 5, 2017.

As a result of the incident, an unknown quantity of fire suppression water mixed with hazardous waste solids (tetrachloroethylene and acetone) escaped from a hazardous waste roll-off box and migrated to a nearby storm drain outfall. Initial actions were taken to assess the potential release of materials from the site, as indicated in the report submitted to the Department dated January 5, 2017. However, collected samples were not analyzed by a State Certified Laboratory capable of processing the samples at limits that meet the State detection standards.

The initial soil sampling was supplemented by additional soil sampling performed on January 18, 2017. The sampling occurred at two locations: designated Outfall #3 (collected from an area where stormwater enters the drainage ditch) and Upstream (collected from an area thought to be unaffected by the incident), as indicated in email correspondence from Mr. Kurt Fogleman dated January 31, 2017. These samples were analyzed for volatile organic compounds, semi-volatile organic compounds, and four (4) Resource Conservation Recovery Act (RCRA) metals. The results were documented in an analytical report dated January 30, 2017, which indicated that no solvent analytes were detected above residential Soil Cleanup Target Levels (SCTLs) as adopted in Chapter 62-777 of Florida Administrative Code (F.A.C.). However, a DEP Letter dated February 28, 2017 noted that the results indicated the residential SCTLs for benzo(a)pyrene toxic

equivalency concentration (BaP TEQs) were exceeded in both Outfall #3 and Upstream soil samples. The residential SCTL for arsenic was also exceeded in the Upstream area.

Additional assessment, as documented in the above referenced Site Assessment Report (SAR), was performed between June 2017 and September 2017 to assess the extent of BaP TEQs and arsenic exceedances. The SAR recommended that a No Further Action (NFA) approval be granted; however, additional assessment is needed to complete vertical delineation of soils and confirm that results do not exceed applicable cleanup target levels (CTLs) prior to consideration of an NFA proposal. The Department offers the following comments regarding additional sampling and procedural clarifications.

1. **General Comments.** The SAR notes that "the source of the polycyclic aromatic hydrocarbons (PAH) and arsenic impacts is unknown and does not appear to be related to the fire incident." However, the January 2017 email from Mr. Fogleman indicates that the results for PAHs are "to be anticipated in an area that drained stormwater from an asphalt surface… [and that] Perma-Fix upgraded the containment area to a concrete structure in recent years." The Department requests a summary that details the extent of these containment area upgrade activities, figures showing the location of current and former asphalt surfaces, and a timeframe for when the area received stormwater that drained from asphalt surfaces. If the source of PAHs is most likely related to anthropogenic materials such as asphalt, then a forensic analysis that compares the detected PAH profiles to established profiles of PAH source materials may assist in confirming the source of these contaminants. A complete assessment of soils will provide additional data that can be utilized in a forensic analysis report.

2. **Permit Conditions.** Part I.12 of the current operating permit requires notification and reporting of any event requiring emergency response, including fire and releases of hazardous waste. While notification to the Department was performed, notification to the Hazardous Waste Program and Permitting personnel in Tallahassee, as identified in Part I.15 of the operating permit <u>was not completed</u>; the SAR should have also been submitted to the RCRA project manager in accordance with these conditions. Please note that all future RCRA and permit related documents should include the EPA ID and current operating permit numbers for the facility.

   The Department requests that the Solid Waste Management Unit (SWMU) / Area of Concern (AOC) Profile Sheet (attached below) be completed in support of assessment activities, with as much as detail as appropriate. Depending on the outcome of site assessment activities and sampling results, this area may be placed into the appropriate category of Appendix A (SWMU/AOC Tables) in the operating permit.

3. **Soil Assessment.** The analytical data dated January 30, 2017 for Outfall #3 and Upstream sampling did not provide a formal report detailing the collection method, sampling depths, and locations of these samples. Figures 2 & 4 should be revised to indicate the location of these samples and the depths they were collected.

Section 4.1.2 of the report states that "no analyzed constituents were detected at concentrations above corresponding SCTLs." However, a BaP Conversion Table was not completed for most of the results noted in Tables 2 and 3 of the SAR. The Department observed exceedances of the residential SCTL for BaP TEQs that were calculated at SB-5 (6-foot sampling interval). BaP TEQs must be calculated for all soil sampling results; a table for multiple samples is located at the following link: https://floridadep.gov/waste/district-business-support/documents/benzoapyrene-equivalents-calculator-multiple-samples.

No soil samples were collected between land surface to 4-feet depth at soil borings SB-3 through SB-6; and no soil samples were collected between land surface to 6-inches depth, or 2-feet to 4-feet depth at SB-1 and SB-2. Additional sampling must be conducted to further assess the vertical extent of contamination from land surface to 6", 6" to 2', and so on every 2', until the water table is reached, in accordance with Chapter 62-780, F.A.C. It appears some soil boring may be located within the concrete containment area, and it should be noted in the report if sampling at a particular interval may or may not be possible. Additional samples at the Upstream sample location area are also requested to complete vertical delineation.

4. **Surface Water and Groundwater Assessment.** The Department acknowledges that surface water (SW) analytical results indicated contaminants above their respective CTLs for SW-1 [bis(2-ethylhexyl) phthalate] and SW-2 [lead, chromium, fluoranthene, and pyrene], and that these results may not represent actual site conditions due to the lack of detections in the "other soil, sediment, groundwater, or surface water samples at concentrations above corresponding CTLs," as stated in the SAR. The report suggested that turbidity in SW-2 may have contributed to these elevated results; however, please note that PAHs were also detected and reported in Table 6, above the annual average as noted in Chapter 62-302, F.A.C. at the location of SW-2. The Department requests that additional surface water samples be collected to confirm the results for previously sampled surface water locations.

   Monitoring wells MW-1, MW-2, and MW-3 were installed as part of assessment activities, however MW-3 was not sampled and analyzed for contaminants. Based on water level measurements, MW-3 appears to be downgradient of the outfall area. It should also be noted that the analytical results for MW-1 and MW-2 indicate that Dibenzo(a,h)anthracene was not detected, but that the Adjusted Practical Quantitation Limit (PQL) and corresponding non-detect values are above the groundwater cleanup target levels (GCTL) for this constituent. The Department requests the resampling of all three (3) groundwater monitoring wells to confirm that the constituents of concern are below their respective GCTLs.

Please submit a report that documents the results of additional/confirmatory sampling and any revised items in a Supplemental Site Assessment Report (SSAR) within 60 days following the receipt of laboratory analytical data. The following bulleted list provides a summary of the requested items that need additional clarification and assessment as detailed in the comments above:

- A summary of the containment area upgrade history and assessment/justification of a possible anthropogenic source for BaP exceedances;
- Completion of the Solid Waste Management Unit (SWMU) / Area of Concern (AOC) Profile Sheet (attached below);
- Notation of the sampling depths and locations of the Outfall #3 and Upstream samples on appropriate figures and tables;
- Explanation for the selected soil sampling depths, locations, and assessment of the entire vertical extent of contamination from land surface to the water table;
- Completion of the BaP Conversion Table for all soil borings/depths; and
- Confirmatory Surface Water and Groundwater sampling.

If you have any questions, please contact Bradley Buselli at (850) 245-8989 or via e-mail at bradley.buselli@floridadep.gov.

Sincerely,

Bryan Baker, P.G., Administrator
Hazardous Waste Program and Permitting

BB/mdr/ai/bb

cc (w/ Attachment):
Brian Bastek, EPA Region 4, bastek.brian@epa.gov
Mike Bland, DEP Headquarters, mike.bland@floridadep.gov
Pam Fellabaum, DEP Northeast District, pam.fellabaum@floridadep.gov
Missy Palcic, DEP Northeast District, merrilee.l.palcic@floridadep.gov
Ronie Rukab, AECOM, ronie.rukab@aecom.com

Attachment:

Solid Waste Management Unit (SWMU)/Area of Concern (AOC) Profile Sheet

ACTION	DESCRIPTION
Number:	SWMU No. generally, continue existing numbering sequence.
Type of Unit	e.g., tank, container, vault, UIC well, surface impoundment, landfill, dumpster, aerosol can crusher, etc. In the event there is no constructed type of unit, it can be described (e.g., open burn and/or detonation area on the ground; pits, ditches, etc.)
Name:	Unique SWMU name (e.g., Used Oil Tank#1, Used Oil Filter Collection Area, Septic tank, Landfill #1, Satellite Accumulation Area, Stormwater Pond #1, etc.)
Unit Characteristics:	General description, including location map, dimensions, SWMU components, appurtenances, construction material, cover (roof?), inside/outside unit, secondary containment, secondary containment capacity, etc.
Operational History:	Dates of operations; dates unit was modified; changes to operational history, e.g., date SWMU ceased operation, changed functions or was physically removed.
Permits	Identify any permits (pending or issued), licenses or authorizations for a unit (e.g., an NPDES permit for a WWTU; an operating permit for an active landfill). Attach a copy of the permits, licenses or authorizations.
Current Status:	Active, inactive but physically existing with the intent of operating in the future, physically closed with no intent to use in the future, certified closed, no longer exists.
Waste Characteristics:	Description of types, volumes, and hazardous or nonhazardous characteristics of waste media managed in the unit. Include hazardous waste codes. Include non-hazardous components (e.g., sulfides, nitrates, pH, etc.).
Waste Management:	Description of handling, treatment, storage, and disposal practices, including names and addresses of treatment, storage or disposal facilities used. Include recycling facilities if materials are recycled. If a permitted unit, include permitted discharges and discharge limits and recent compliance reports;
Maintenance Procedures:	Description of maintenance and inspection procedures to assure unit integrity.
Release History:	Visual evidence or reports of hazardous or non-hazardous releases, including associated dates and any regulatory actions performed. Include any assessment data. If the SWMU is regulated under another program, provide the latest compliance data (e.g., if a WWTP has an NPDES permit, provide the latest discharge point sampling data. If a landfill, include a summary of the latest groundwater monitoring and leachate data).
0Potential Pathways:	Air (L), soil (L), surface water (L), sediment (L), groundwater (L). Use L (low), M (medium) or H (high)
Exposure Potential:	Location and use of nearby water wells, surface water, and other potential human and environmental/ecological receptors.
Remedial Action:	Description of any interim measures and remedial action performed due to past releases, including dates and types of remediation performed and waste management.
Recommendation and reason for recommendation	No Further Action, Confirmation Sampling, RFI necessary, RAP necessary or continuation of any of these that are in progress.
References (if any)	Include title, date and author of any reports that support this table's information
Photographs	Include SWMU name, short description, orientation (e.g., facing south), date of photo and name of photographer. Point out any significant features.

Last updated on September 29, 2016