From: Lubozynski, Tom
To: "vsanagustin@feccorporation.com";
cc: Kraemer, Janine; DePradine, Gloria-Jean; Morgan, Steve; Pelz, Susan; Lubozynski, Tom; pbermillo@wm.com; "dperez@wm.com"; Martin, Lee; Tedder, Richard; "Lori. Cunniff@ocfl.net"; jdavoll@apopka.net;
Subject: Disposing Pond Excavations from MacDill Air Force Base, Tampa at Vista Class III Landfill
Date: Thursday, November 17, 2011 11:45:41 AM
Attachments: image001.png
lab results 07-07-11.pdf
benzo(a)pyrene equivalents conversion.pdf
splp results 080311.pdf
MacDill BASH Lab Results 072711.pdf
SWM-04-39 determining if class III waste 2008-09-11.pdf
Guidance For St-Sweep 05-03-04 Final.pdf

TO: Victor San Agustin

In your e-mail below you request Central District to tell you what documentation is necessary to consider this "non-clean fill" excavated material to be a Class III waste that may be disposed and / or used as cover material at Vista Class III Landfill. You have not provided enough information to make a definitive statement about the disposal of the material in a Class III landfill. Hopefully the following provides the information you are seeking . if not, please call or e-mail me for further discussions.

There are two guidance documents that pertain to this project:

1. "Guidance For The Management Of Street Sweepings, Catch Basin, Sediments and Stormwater System Sediments," dated May 18, 2004 (attached)

2. Class III Waste – Part 2, SWM-04.39," dated September 11, 2008 (attached)

Section 5.3 of the first guidance document states sediments from non-industrial stormwater systems may be disposed in a Class III landfill provided there is no reason to believe they are contaminated, such as being impacted through a chemical spill.

- Are these ponds non-industrial stormwater system ponds? How do you know that? (They would be industrial ponds if receive stormwater from apron areas where aircraft maintenance is done or from hangars. They would be non-industrial ponds if they receive stormwater only from taxiways and runways.)

- Has a chemical spill that may have drained to the ponds ever occurred (for example, an aircraft accident on the runway that had petroleum products flushed into the ponds)? How do you know that?

- Are the analytical results similar to the concentrations reported in the first guidance document?

Section 5.3 of the first guidance document states sediments from industrial stormwater systems may NOT be disposed of in Class III landfills unless approved by the Department. In the section labeled "The

'Leachate Test," policy memo SWM-04.39 discusses how to prove a material can be considered a Class III waste. The results of the limited testing indicate that soil leachability in groundwater might be a concern for the following constituents: lead SPLP results were not provided and petroleum range hydrocarbons in sample M01078-SW/SE-04-0.5. (Soil leachability in fresh surface water is not a concern for disposal in Vista Class III Landfill.) When initial leaching test results are significantly below the soil leachability cleanup target levels Central District has not required the calculation of the upper 95% confidence level concentration for each chemical of concern.

I recommend you submit a letter report that is signed and sealed by a professional engineer explaining how the requirements of the two guidance documents have been met. The documents that are relied upon for the opinion should included or should be readily available. The document should conclude whether the excavated material meets the requirements of the first or second guidance document. If Central District agrees with the signed/sealed opinion the material would be allowed to be disposed in the Vista Class III Landfill.

My e-mail addresses only the disposal of the excavated material at the Vista Class III landfill which is in the Central District. How to do the excavation or whether there are waste cleanup requirements are topics to discuss with the DEP Southwest District Office.

Tom Lubozynski

F. Thomas Lubozynski, P.E.
Waste Program Administrator
407-897-4300

From: Victor San Agustin [mailto:vsanagustin@feccorporation.com]
Sent: Thursday, November 10, 2011 9:51 AM
To: Kraemer, Janine
Cc: Gordon Kirkland; Morgan, Steve
Subject: Upcoming Pond Excavations, MacDill Air Force Base, Tampa

Good Morning Janine,

This is a request to please advise us what documentation the Department requires to allow reuse as daily cover of "non-clean fill" excavated material at a Class III landfill.
Attached are the following current info we have on samples taken from the 4 ponds:

1. Summary of lab results (*MacDill BASH Lab Results 072711.pdf*)
2. *Benzo(a)pyrene equivalents conversion.pdf*
3. SPLP testing of Ponds 1 and 2 samples for chromium (*splp results 080311.pdf*)
4. Actual lab report used to create Summary 1. Above (*lab results 07-07-11.pdf*)

If allowed, we plan to use the Vista Class III landfill in Orange County to receive "non-clean fill" excavated material from Ponds 3 and 4.
We are currently working with FDEP SW District on Ponds 1 and 2 as shown in the emails

below.
I will call you later today or tomorrow to touch base. Thanks for the help.

Victor L. San Agustin, P.E., C.H.M.M.
Senior Engineer
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cell 813-842-5520
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website www.feccorporation.com

RESTORING THE PAST,
SAFEGUARDING THE FUTURE

From: Victor San Agustin
Sent: Wednesday, November 09, 2011 1:53 PM
To: 'Morgan, Steve'
Cc: Gordon Kirkland; Pelz, Susan
Subject: RE: Upcoming Pond Excavations, MacDill Air Force Base

Steve,

Thanks for reviewing our email. As discussed, attached are the requested documents that we do already have, namely:

1) Copy of the actual lab results (*lab results 07-07-11.pdf*) as requested in item 1. of your email.
2) *Benzo(a)pyrene equivalents conversion.pdf* as requested in item 2. Of your email
3) SPLP test report for chromium (*splp results 080311.pdf*) as requested in item 4. Of your email.

If you have any questions/concerns, regarding the attachments, please let me know.

I will be working on items 3., 5., and 6. of your email and will get back to you.

Victor L. San Agustin, P.E., C.H.M.M.
Senior Engineer
FECC, Inc. d/b/a Florida Environmental Compliance Corporation

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website www.feccorporation.com

RESTORING THE PAST,
SAFEGUARDING THE FUTURE

From: Morgan, Steve [mailto:Steve.Morgan@dep.state.fl.us]
Sent: Wednesday, November 09, 2011 10:53 AM
To: Victor San Agustin
Cc: Gordon Kirkland; Pelz, Susan
Subject: RE: Upcoming Pond Excavations, MacDill Air Force Base

Victor:

I attempted to call you back on Monday and you were in a meeting. A message was left for you to give me a call. The information in your e-mail and the attached summary table was insufficient for the Department to determine whether the excavated soils & sediment were "clean fill" or could be used for "beneficial reuse". Please provide additional information to address the following comments:

1) The table provided appears to be a summary of some of the analytical results on the soils/sediments. Please provide a copy of the actual laboratory analytical results for the Department's review.
2) The results for Bernzo(a)pyrene in the Pond 3 appear to exceed both the residential and commercial SCTL. The table notes (See attached calculation) however attached calculation were not provided. Please provide these calculations, as appropriate.
3) Please explain why arsenic leachability values were not determined as indicated in Note *** of the table.
4) Please provide the SPLP testing for Chromium indicated in Note #1 of the table for Pond 1 & 2.
5) Please provide a narrative description of your proposed beneficial reuse for the soils/sediments.
6) Soils/sediments that do not qualify as "clean Fill" shall not be stockpiled on the base for future beneficial reuse without an approved specific plan for storage (e.g. storage on an impervious surface and covered) and a specific description of the future beneficial reuse that addresses how human health and the environment will not be adversely impacted.

Please note that the Department has no objection to option of disposal of the soils/sediments at a permitted Class I landfill.

Please feel free to e-mail or call me if you have any further questions.

Steven G. Morgan, Solid Waste Section
Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

phone - (813) 632-7600 x385
fax - (813) 632-7664
e-mail - steve.morgan@dep.state.fl.us

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.

From: Victor San Agustin [mailto:vsanagustin@feccorporation.com]
Sent: Tuesday, November 08, 2011 3:38 PM
To: Pelz, Susan
Cc: Gordon Kirkland; Morgan, Steve
Subject: Upcoming Pond Excavations, MacDill Air Force Base

Dear Susan,

I was not able to reach you by phone last week so I am writing this email.

This is to touch base with the Department to see if any additional testing is required prior to conducting the excavation at Stormwater Ponds 1 and 2. Enclosed are analytical results of composite samples taken prior to excavation at Ponds 1, 2, 3, and 4, all located at the MacDill Air Force Base Replacement Clinic in Tampa. Lab results for Ponds 1 and 2 are shown as M01078-SW/SE-**01**-0.5 and M01078-SW/SE-**02**-0.5 respectively. Lab results for Pond 3 are shown as M01078-SW/SE-**03**-0.5 and M01078-SW/SE-**03**-0.5-**A**. Lab results for Pond 4 are shown as M01078-SW/SE-**04**-0.5. The banks of these four ponds are going to be regraded and excavated soils and sediments will be generated as a result of the regrading.

Based on the results shown in the attached for the composite samples from Ponds 1 and 2, the attached data indicates that its sediments and soils may be used as clean fill for beneficial reuse. Based on the attached results, there is no plan at this time to conduct additional testing on the excavated material unless the Department deems otherwise. We will greatly appreciate the Department's feedback regarding this matter.

For the Department's information, excavated soils from Ponds 3 and 4 will be composite-sampled approximately every 500 cubic yards and will be SCTL tested and if necessary SPLP-tested and data will be compared with FDEP groundwater cleanup target levels. The results should help determine whether each respective stockpile may be used as clean fill or whether the stockpile will have to be properly disposed offsite at a permitted solid waste landfill. Stockpiles that do not qualify as clean fill may also be stockpiled on Base for future beneficial reuse or future disposal at a permitted solid waste landfill.

If you have any questions or need additional information, please call me or send an email.

Victor L. San Agustin, P.E., C.H.M.M.
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website www.feccorporation.com

RESTORING THE PAST,
SAFEGUARDING THE FUTURE

No virus found in this message.
Checked by AVG - www.avg.com
Version: 2012.0.1869 / Virus Database: 2092/4604 - Release Date: 11/08/11

No virus found in this message.
Checked by AVG - www.avg.com
Version: 2012.0.1869 / Virus Database: 2092/4606 - Release Date: 11/09/11