

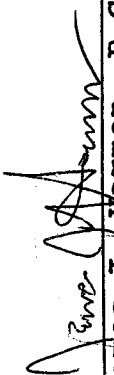
Application/File No. FL-20-A Time Perky 116

I HEREBY CERTIFY that the geological features described in the referenced application/project and additional information submittals, if any, [provide/do not provide] reasonable assurance of compliance with the applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Title 62. This review was limited to

Preliminary Contamination Assessment Report

aspects of the proposed project. I have not evaluated and I do not certify aspects of the proposed project outside of this review, as described above. In addition, I have not evaluated and I do not certify the aspects of the proposed project outside of my area of expertise (including but not limited to the engineering features).

This review was conducted by JAMES HARMON Name


JAMES J. Harmon, P.G. (SEAL)

9-20-2004 Date


RETAIN IN FILE


Memorandum

Florida Department of Environmental Protection

TO: Bill Forrest, Solid Waste Section

THROUGH: Joe Lurix, Solid Waste Program Manager

THROUGH:  Paul Wierzbicki, P.G., Waste Cleanup Program Manager

FROM:  Jim Harmon, P.G., Waste Cleanup Section

DATE: SEP 20 2004

RE: Florida Tire Recycling
Preliminary Contamination Assessment Report (PCAR)

I have reviewed the document titled "Contamination Assessment Report" (CAR), dated August 2004 (received August 19, 2004), that was prepared by Hydrologic Associates U.S.A., Inc. for the above-referenced facility. As an initial comment the document is actually a Preliminary Contamination Assessment Report (PCAR) as it was prepared in response to a Preliminary Contamination Assessment Plan (PCAP) and fundamentally does not contain nearly enough information or detail to be considered a CAR. I offer the following comments that should be addressed:

1. The described geology is very rudimentary and the hydrogeology (based on inferences from bordering counties) is inadequate for a report of this nature. The reported site conditions should be based on site specific information and measurements. Fortunately, the laboratory results did not indicate that that level of information is required.
2. The well survey that was conducted is inaccurate. The site which borders this property (Allied Universal) has permitted supply wells which should have been identified. This raises some questions about the sufficiency and accuracy of the water well survey that was conducted.
3. The text and tables reveal an incomplete understanding of Department rules and the cleanup target values typically used for site assessment. For example, Table 1 references Chapter 62-777, Florida Administrative Code (F.A.C.) as the rule containing the groundwater criteria values. Groundwater criteria are contained in Chapter 62-520, F.A.C. (referencing Chapter 62-550, F.A.C.) while surface water criteria are contained in Chapter 62-302, F.A.C.. Table 1 reports the same criteria for both groundwater and surface water for metals, which are normally not the same value. In fact, the surface water standards for metals would need to be individually calculated since they are hardness dependent, yet no hardness measurement was even made. Fortunately, it does not appear that the State's surface water criteria would apply in a detention area that is contained completely on-site and does not ever discharge off-site. As another example, Table 2 attempts to apply the criteria for direct exposure and leachability from Chapter 62-770, F.A.C. (which actually should be 62-777, F.A.C.) to both soils and sediments. Chapter 62-777, F.A.C. does not apply to sediments. Table 2 also fails to identify that the leachability criteria for two of the metals listed (Iron and Lead) are based on-site specific leachability tests rather than the default criteria. Based on the concentrations of Lead reported it does not appear that a leachability test is required for Lead. However, the same cannot be said for the parameter of Iron.

4. The elevated concentrations of Iron (in soils, sediments and groundwater) were not sufficiently addressed within the submittal and need to be further explained. The variation of groundwater concentrations between monitoring wells 1, 2 and 3 does not seem to support an argument for "background" conditions. The concentration of Iron in the soil samples also varies by orders of magnitude (non-uniform distribution).
5. The elevated zinc in sediment samples SED-1 and SED-2 and FLPRO concentrations in sample SED-1 reveal that the "surface water swale" has been impacted and needs to be further addressed. The concentrations of zinc and petroleum products (via FLPRO) in sediments are above the soil concentration target levels for leachability to surface water. While this number is not directly applicable it does suggest that those sediments could pose a threat to surface water quality. Previous surface water quality samples from this "swale" revealed elevated TRPH values. Further information should be provided regarding the stormwater system and these "swales" and whether they discharge off-site and/or connect to waters of the State. If the State surface water quality standards apply additional assessment may be required.

Therefore, I do not concur with the recommendation for "no further action" at this site at this time based on the information provided. Should you have any questions let me know.

SI/flatirepcar