



FLORIDA DEPARTMENT OF Environmental Protection

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Memorandum

TO: John Sykes, Environmental Specialist III
Waste Site Cleanup, Waste Cleanup Program;

THROUGH: Brian Dougherty, Program Manager
District & Business Support Program, DWM

FROM: Jeff Wagner, PG II
District & Business Support Program, DWM

SUBJECT: Spindrift-Whogas, Inc. Site
1520 Tallevast Road, Sarasota, Manatee County
Revised Annual Report and Conditional Site Rehabilitation Completion Report dated
October 10, 2019
Site ID: ERIC_3945

DATE: November 18, 2019

The District and Business Support Program (DBSP) has reviewed the Revised Annual Report and Conditional Site Rehabilitation Completion Report (October 10, 2019).

DBSP finds that the recent sampling event results are very similar to the previous results and the conclusion reached in the DBSP July 29, 2019 Memorandum regarding the conditional closure does not change.

- The site meets criteria for No Further Action and conditional closure under Risk Management Option II (RMO-2) as per Rule 62-780.680(2), Florida Administrative Code (F.A.C.). The plume size for the remaining contaminants (arsenic and antimony) is less than $\frac{1}{4}$ acre. The remaining plumes are contained within the source property.
- Previously, in the July 29, 2019 DBSP Memorandum it was recommended that aluminum be considered background and not a constituent of concern (COC) for this site. Clays are often rich in aluminum and there is significant clay content in the lithology of the site. Groundwater aluminum concentrations exceed the GCTL on the property, off the source property and for a considerable distance upgradient and side gradient of the source property.
 - Given that background groundwater concentrations for aluminum will be used to meet the groundwater cleanup target level, the NFA Proposal contained within the October 10, 2019 Revised Annual

Report and Conditional Site Rehabilitation Completion Report should be modified to indicate background groundwater aluminum concentrations were used to meet CTLs for the conditional closure request.

- All reports containing a No Further Action proposal need to include a professional certification statement that certifies that the rehabilitation activities associated with this site were conducted in accordance Chapter 62-780, F.A.C. Please refer to Rule 62-780.400, F.A.C.
 - A statement is required to be submitted for this report.
- It should be noted that a provisional groundwater cleanup target level (GCTL) for PFOA and PFOS of 70 nanograms (ng) for combined PFOA and PFOS has been developed. Provisional CTLs are CTLs that do not already have promulgated values in Chapter 62-777, F.A.C. The Provisional CTL for PFOA and PFOS was calculated according to the Chapter 62-777, F.A.C. and Chapter 62-780, F.A.C. promulgated rule criteria and rule equations. The Provisional CTLs have the same status as Alternative CTLs and are enforceable.
 - The PFOA and PFOS results reported in the October 10, 2019 Annual Report indicate that the concentrations for these constituents are well below the 70 ng/L provisional GCTL.
- Details regarding the 62-780.680, F.A.C. conditional closure evaluation are included in the July 29, 2019 DBSP memorandum.

Please contact me at Jeffry.Wagner@FloridaDEP.gov or 850-245-8967, if you have any questions.