



Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 27, 2008

Mr. Joe Wier
McKenzie Tank Lines, Inc.
Post Office Box 1200
Tallahassee, Florida 32302

Dear Mr. Wier:

This is in response to the Drum Cleanup Project February 25, 2008 Response to Comments Report (Interim Source Removal Report Addendum) submitted by Geovac Environmental Services, Inc. (Geovac), on behalf of McKenzie Tank Lines, Inc., (FDEP ID# COM_71868) located at 2778 West Tharpe Street, Tallahassee, Leon County, Florida.

Upon review, your consultant's description of the drum content screening and subsequent laboratory analysis of the drum contents appear reasonable. Also, analytical results of the confirmation soil samples collected from the East Drum Accumulation Area shows no impacted soils remain in this area. However, the information provided shows impacted soils exist in the northern portion of the site. The extent of soil contamination in the West Drum Accumulation Area, the Washrack Drum Area, the Drums West Area, and the Drum 76 Area needs to be determined and recommendations for corrective actions should be provided in an ISRR Addendum.

Please refer to the enclosed review memorandum for additional information.

Unless notified otherwise, we look forward to receiving your ISRR Addendum addressing the concerns noted in our review memorandum no later than May 26, 2008. If you have any questions please contact Julie Ann Hardy, Project Manager, at (850) 595-8360, extension 1211 or at email address julie.hardy@dep.state.fl.us.

Sincerely,

Karen Shea, P.E.
Cleanup Section Supervisor

KBS:jhr

Enclosure (1): Memo dated 3/17/08

cc: John M. Elrod, P.G., Geovac Environmental Services, Inc. w/enclosure
Jim Byer, FDEP

Memorandum

Florida Department of Environmental Protection

TO: Karen Shea, P.E. *KBS*

FROM: Julie A. Hardy *JAH*

DATE: March 17, 2008

SUBJECT: McKenzie Tank Lines Drum Cleanup February 25, 2008 Response to Comments (Interim Source Removal Report (ISRR) Addendum)

I have reviewed the report submitted by Geovac Environmental Services, Inc. (Geovac), on behalf of McKenzie Tank Lines, Inc., located at 2778 West Tharpe Street, Tallahassee, Leon County, Florida. The report was submitted in response to our January 14, 2008 request for an addendum to the September 17, 2007 ISRR. Upon review, the consultant's description of the drum content screening and subsequent laboratory analysis of the drum contents appear reasonable. Also, analytical results of the confirmation soil samples collected from the East Drum Accumulation Area shows no impacted soils remain in this area. However, the information provided shows impacted soils exist in the northern portion of the site. The extent of soil contamination in the West Drum Accumulation Area, the Washrack Drum Area, the Drums West Area, and the Drum 76 Area needs to be determined and recommendations for corrective actions should be provided in an ISRR Addendum.

In response to our request to clarify whether there was a discharge in the West Drum Accumulation Area in Comment #4, the consultant indicates that soil samples were collected in August 2007 and January 2008 from 0.5 feet below land surface (bls) at the edge of the pavement adjacent to the rust stained asphalt. The August 9, 2007 Chain of Custody Record, identifies "Washrack Drum" as a location of a sample collected on this date. The February 1, 2008 Chain of Custody Record shows five soil samples were collected from the "Drums West" on January 31, 2008. However, the Soil Analytical Results Site Map depicts one location described as Washrack Drums/Drums West located northwest of the West Drum Accumulation Area. There is also an area described as Drum 76 in which soil samples were collected that is located north northeast of the West Drum Accumulation Area. The scale of the site map does not allow for accurate illustration of soil sampling locations of the August 2007 and January 2008 sampling events. A site map scaled to adequately depict the sampling locations and sample depths of **all** soil samples collected in this region is needed.

Furthermore, the Drum Area Soil Analytical Results Table indicates TRPH concentrations exceeded the leachability criteria in samples collected from the Drum 76 Area and the Washrack Drum Area in August 2007. August 2007 results also show soil collected from the Washrack Drum Area exceeded their respective cleanup target level

"More Protection, Less Process"

(CTL) for barium and chromium. The Analytical Summary Table shows no CTL exceedences from soil samples collected from the Drums West Area on January 31, 2008. However, I can find no laboratory analytical data for samples collected on January 31, 2008. This information should be included in an ISRR Addendum.

While the soil sampling locations in relation to the West Drum Accumulation Area remains unclear, the data provided indicates that soil located in the Washrack Drum Area is impacted with elevated concentrations of barium, chromium, and TRPH. Elevated concentrations of TRPH were also discovered in the samples collected from the Drum 76 Area. The vertical and horizontal extent of contamination in these areas needs to be determined and recommendation for corrective actions should be provided in an ISRR Addendum. If it determined that soil contamination above CTLs is present at or below the water table, additional groundwater assessment may be necessary.

Furthermore, regarding our Comment #5 requesting a discussion as to the origin of the Bis(2ethylhexyl)phthalate concentrations exceeding the groundwater cleanup target level discovered in MW-2D, the consultant indicates that the results of the January 31, 2008 re-sampling of MW-2D was below laboratory limits for all constituents associated with EPA Method 8270. However, while the February 1, 2008 chain of custody records shows samples were collected from MW-2D, no laboratory analytical data or groundwater sampling logs were found in the report. This information is needed.

We should expect the addendum with the information requested above to be submitted within 60 days of our response letter receipt.

JAH:jh