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Lakeland
(863) 646-1402
FAX (863) 647-3806

May 27, 2016

Ms. Allison Amram, PG
Brownfields Coordinator
Environmental Protection Commission of Hillsborough County
Waste Management Division
3629 Queen Palm Drive, 2nd Floor South
Tampa, Florida 33619

RE: EPC Correspondence Dated April 28, 2016
Conditional No Further Action Proposal (CNFAP)
Former Hydraulic Hose/JWH Limited – Former Telco Oil
617-619 South Evers Street, Plant City, Florida
FDEP Facility ID No. 29/8735902
CSI File No. 9680.20A

Dear Ms. Amram:

As authorized, Chastain-Skillman, Inc. (CSI) is providing this response to the comments included within your correspondence dated April 28, 2016, regarding the Conditional No Further Action Proposal (CNFAP) for the above-referenced facility (**Figure 1**).

EPC Comment 1: RMO 2 vs. RMO 3- *The groundwater quality from the Post Active Remediation Monitoring (PARM) reports indicates that the site may qualify for a Risk Management Options (RMO)2 with analytical data from the edge of the property boundary. This would allow the adjacent parcel to be unencumbered by institutional controls. If the City prefers to restrict the additional adjacent property with a RMO 3, please provide a revised Figure 2 with the extent of GCTL exceedances to support the proposed conditional closure.*

- The Community Redevelopment Agency (CRA) of the City of Plant City has evaluated the RMO-2 vs. RMO-3 options and determined that a RMO-3 closure is preferred at this time. As indicated within the CNFAP dated March 28, 2016, no additional data collection should be required given that the proposed RMO-3 closure includes the source area parcel identified as Folio 208697-0000 and the adjacent downgradient parcel identified as Folio 208694-0000 (**Figure 2**).

- The inferred extent of the dissolved plume as depicted on **Figure 2** is also depicted on **Figure 3,** which includes the extent of the GCTL exceedances to support the proposed conditional closure.

EPC Comment 2: Groundwater trends - *Groundwater monitoring results from April 2015 showed a significant rise in ethylbenzene, xylenes, naphthalene, 1-methyl naphthalene and 2-methyl naphthalene in wells MW-5 and MW-6. While the plume of affected groundwater is shrinking, §62-780.680.(3)(c)2 requires that the plume be stable as well as shrinking in order to appropriately implement site closure with controls. Naphthalene is currently higher than the Natural Attenuation Default Concentrations in monitoring well MW-6. EPC requests that these wells be resampled for the parameters listed above or a technical explanation be provided to address this rebound of contaminants in MW-5 and MW-6.*

As noted in EPC's Comment 2 above, while the plume of affected groundwater is shrinking, §62-780.680.(3)(c)2 requires that the plume be stable as well as shrinking in order to appropriately implement site closure with controls. Stable can be defined as "resistant to change of position or condition" or "not subject to sudden or extreme change or fluctuation". Given that the plume is shrinking, it would appear that the plume is sufficiently stable within the context of the proposed RMO-3 closure based upon the following:

- Groundwater flow was generally to the northwest or west to northwest.
- The depth to groundwater generally ranged from 3 to 6 feet below top of casing.
- The proposed RMO-3 closure includes the source area parcel identified as Folio 208697-0000 and the adjacent downgradient parcel identified as Folio 208694-0000 (**Figure 2**).
- The groundwater analytical data depicted on **Figure 3** and **PPM Figure 4A** indicates that petroleum products' contaminants of concern (COCs) decreased at MW-5 and MW-6 from 2007 to 2011, and generally increased from 2011 through 2015. While the groundwater analytical data reveals a low to moderate increasing trend at MW-5 and MW-6 from 2013 through 2015, the COC concentrations remain well below those identified in 2007.
- The groundwater analytical data depicted on **Figure 3** and **PPM Figure 4A** indicates that ground water samples were collected from each of the other monitoring wells until the analytical results revealed two consecutive quarters below GTCLs.
- The groundwater analytical data depicted on **Figure 3** and **PPM Figure 4A** indicates that petroleum products' contaminants of concern (COCs) at downgradient well RW-3 have remaining below GCTLs during each sampling event completed from 2007 through 2015.
- The groundwater assessment data above indicates that groundwater concentrations of petroleum products' contaminants of concern at the institutional control boundary do not, and will not, exceed the appropriate groundwater CTLs pursuant to paragraph 62-780.680(1)(d), F.A.C.

***EPC Comment 3: Institutional Controls** - The proposed institutional control was forwarded to the Office of General Counsel for the Florida Department of Environmental Protection (FDEP) for comment to ensure that it meets the FDEP's developing criteria.*

- Acknowledged.

Conclusions and Recommendations

The following conclusions are based upon the site assessment, source removal, active remediation, and post active remediation monitoring activities conducted by others and summarized within the CNFAP dated March 28, 2016, and this correspondence:

- There is currently no free product or explosion hazard identified at the subject property.
- There is currently no contaminated soil identified at the subject property.
- The remaining area of groundwater contamination appears to meet the F.A.C. 62-780.680(3) Risk Management Options (RMO) Level III criteria.

As such, it is recommended that closure of this site be conducted under RMO Level III pursuant to applicable provisions of Rule 62-780.680(3), F.A.C. as follows:

- The proposed institutional control boundary (**Figure 2**) for the RMO III closure shall include the source area parcel identified as Folio 208697-0000 and the adjacent downgradient parcel identified as Folio 208694-0000. Both parcels are owned by the Community Redevelopment Agency (CRA) of the City of Plant City and have access to the City of Plant City public water system.
- In accordance with FDEP's Site Closure with Conditions Memorandum dated November 1, 2013, Plant City Ordinance Article II, Division 1, Sections 74-31 and 74-32, will be the governmental control utilized as an alternative institutional control to provide the necessary degree of restriction to the remaining petroleum-contaminated groundwater associated with this facility.

If you have any questions or require additional information, please contact our office at your earliest convenience.

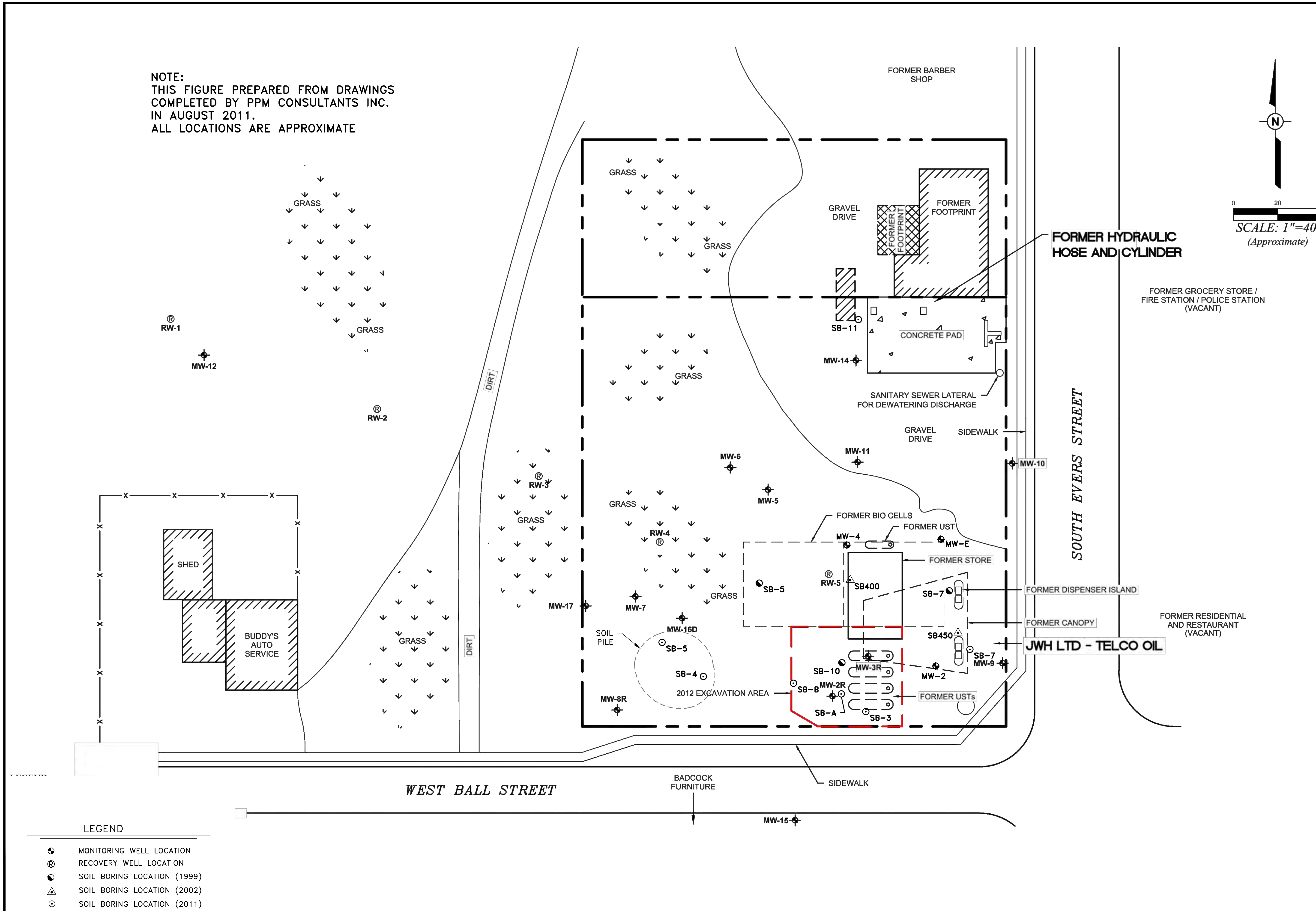
Sincerely,

CHASTAIN-SKILLMAN, INC.

Charles Browning, PG
Senior Project Manager

Greg J. Lassi, PG, MPH (seal) 5-27-16
Principal/Hydrogeology
& Environmental Risk

xc: Michael A. Schenk, PE, City Engineer, City of Plant City
Kenneth W. Buchman, City Attorney, City of Plant City
Frank Hearne, Esquire



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REV.: P-0

DATE: 01/20/16

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CITY OF PLANT CITY RISK MANAGEMENT OPTION EVALUATION

SAMPLE LOCATIONS

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PROJECT NO. 9680.20A

SHEET NO. FIGURE 1

0
50'
100'

NORTH

CITY OF PLANT CITY
RISK MANAGEMENT OPTION EVALUATION

PROPOSED INSTITUTIONAL CONTROL BOUNDARY

SHEET NO. FIGURE 2
PROJECT NO. 9680.20A
DRAWN BY BLF
REV P-0
DATE 02/05/16
REVISION NO.
REVISION DATE
REVISION DESCRIPTION
REVISION DESCRIPTION

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C.A. No. 262
Design Office : 4705 Old Highway 37, P.O. Box 5710 Lakeland, Florida 33807-5710 (863) 646-1402
Corporate Headquarters : 4705 Old Hwy 37, P.O. Box 5710, Lakeland, FL 33807-5710 (863) 646-1402

P:\968020A\CAD\Risk\968020A-16-CBB-SITE.dwg FIG 2 Feb 08, 2016 11:05am by: bfisher

NOTE: SEMIANNUAL PARM WELLS
MW-5
MW-6
RW-3

MW-7	09/27/12	02/06/13	08/22/13	12/03/13
B	NA	NA	NA	NA
T	NA	NA	NA	NA
E	NA	NA	NA	NA
X	NA	NA	NA	NA
MTBE	NA	NA	NA	NA
NAPH	0.20	33	0.052 I	0.059 I
1-METH	0.068 I	24	0.028 U	0.027 U
2-METH	0.15	43	0.025 U	0.026 U

RW-3	04/10/15
B	0.20 U
T	0.40 U
E	0.20 U
X	0.51 U
MTBE	0.30 U
NAPH	0.31 U
1-METH	0.31 U
2-METH	0.31 U

MW-5	09/27/12	02/06/13	08/22/13	12/03/13	04/10/15
B	NA	NA	NA	0.23 U	0.20 U
T	NA	NA	NA	0.20 U	0.40 U
E	NA	NA	NA	4.2	28.3
X	NA	NA	NA	0.22 U	10.6
MTBE	NA	NA	NA	0.28 U	0.30 U
NAPH	5.0	0.078 I	4.4	0.89	16.5
1-METH	0.89	0.036 I	0.51	0.042 I	0.90
2-METH	0.71	0.036 I	0.65	0.026 U	0.76 I

MW-11	12/03/13
B	0.23 U
T	0.20 U
E	0.20 U
X	0.22 U
MTBE	0.28 U
NAPH	0.032 U
1-METH	0.027 U
2-METH	0.026 U

RW-5	09/27/12	02/06/13	02/06/13	12/03/13
B	NA	NA	NA	NA
T	NA	NA	NA	NA
E	NA	NA	NA	NA
X	NA	NA	NA	NA
MTBE	NA	NA	NA	NA
NAPH	0.78	120	0.032 U	8.1
1-METH	0.028 U	35	0.029 U	1.4
2-METH	0.025 U	46	0.026 U	0.7 I

MW-6	12/03/13	01/17/14	04/10/15
B	0.23 U	0.23 U	1.0 U
T	1.1	1.0	2.0 U
E	370	300	456
X	130	76 V	90.9
MTBE	0.28 U	0.28 U	1.5 U
NAPH	130	110	240
1-METH	18	11	41.4
2-METH	22	17	62.6

MW-10	12/03/13
B	0.23 U
T	0.20 U
E	0.20 U
X	0.22 U
MTBE	0.28 U
NAPH	0.031 I
1-METH	0.026 U
2-METH	0.026 I

MW-3R	09/27/12	02/06/13	08/22/13	12/03/13
B	1.7	0.84 I	0.46 I	0.23 U
T	0.20 U	0.20 U	0.20 U	0.20 U
E	0.20 U	0.20 U	0.31 I	0.20 U
X	0.22 U	0.22 U	0.22 U	0.22 U
MTBE	0.28 U	0.28 U	0.28 U	0.28 U
NAPH	0.077 I	0.042 I	0.12 I	0.067 I
1-METH	0.044 I	0.028 U	0.030 U	0.027 U
2-METH	0.064 I	0.025 U	0.035 I	0.026 U

MW-2R	09/27/12	02/06/13	08/22/13	12/03/13
B	0.56 I	1.0	0.23 U	0.23 U
T	0.61 I	0.20 U	0.20 U	0.20 U
E	0.20 U	0.20 U	0.20 U	0.20 U
X	0.22 U	0.22 U	0.22 U	0.22 U
MTBE	0.28 U	0.28 U	0.28 U	0.28 U
NAPH	0.21	0.17	0.097 I	0.043 I
1-METH	0.082 I	0.11	0.029 U	0.027 U
2-METH	0.14	0.16	0.031 I	0.026 U

MW-9	12/03/13
B	0.23 U
T	0.20 U
E	0.20 U
X	0.22 U
MTBE	0.28 U
NAPH	0.30
1-METH	1.9
2-METH	0.026 U

MW-8R	12/03/13
B	0.23 U
T	0.20 U
E	0.20 U
X	0.22 U
MTBE	0.28 U
NAPH	0.037 U
1-METH	0.031 U
2-METH	0.030 U

NOTE:
THIS FIGURE PREPARED FROM DRAWINGS COMPLETED BY PPM CONSULTANTS INC. ON 4-21-15.
ALL LOCATIONS ARE APPROXIMATE

RW-1
MW-12
RW-2
RW-3
MW-6
MW-5
MW-11
MW-10
RW-4
INFERRED EXTENT OF DISSOLVED PLUME
RW-5
MW-14
CONCRETE PAD
GRAVEL DRIVE
SOUTH EVERS STREET
FORMER BIO CELLS
FORMER UST
FORMER STORE
FORMER DISPENSER ISLAND
FORMER CANOPY
FORMER USTs
2012 EXCAVATION AREA
MW-17
MW-7
MW-16D
MW-3R
MW-9
MW-2R
MW-8R
BUDDY'S AUTO SERVICE
SIDEWALK
BADCOCK FURNITURE
WEST BALL STREET
MW-15

0 20 40
SCALE: 1"=40'
(Approximate)

LEGEND:

⊕	MONITORING WELL LOCATION
®	RECOVERY WELL LOCATION
2.8	RED NUMBER INDICATES AN EXCEEDANCE IN FDEP GCTLs
GCTL	GROUNDWATER CLEANUP TARGET LEVEL PER CHAPTER 62-777, FAC, TABLE 1
B	BENZENE
T	TOLUENE
E	ETHYLBENZENE
X	TOTAL XYLENES
NA	NOT ANALYZED
NAPH	NAPHTHALENE
MTBE	METHYL TERT BUTYL ETHER
1-METH	1-METHYLNAPHTHALENE
2-METH	2-METHYLNAPHTHALENE
I	ESTIMATED VALUE BELOW THE LOWEST CALIBRATION POINT
U	BELOW DETECTION LIMIT
V	THE ANALYTE WAS DETECTED IN BOTH THE SAMPLE AND THE ASSOCIATED METHOD BLANK

NOTE:
CONCENTRATIONS REPORTED IN MICROGRAMS PER LITER

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REVISION DESCRIPTION
REVISION DATE
REVISION NO.
REV. P-0
DATE: 01/20/16
DRAWN BY: BLF

CITY OF PLANT CITY
RISK MANAGEMENT OPTION EVALUATION
DISSOLVED HYDROCARBON CONCENTRATION MAP

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PROJECT NO. 9680.20A
SHEET NO. FIGURE 3

P:\9680\20A\CAD\Risk\9680\20A-16-GBB-SITE.dwg FIG 3 May 18, 2016 2:05pm by: bfisher

RW-1	09/26/07	05/12/11	05/25/11
B	0.5	ND(0.249)	NA
T	0.5	ND(0.201)	NA
E	0.4	ND(0.210)	NA
X	1.0	ND(0.26)	NA
MTBE	0.4	ND(0.460)	NA
TRPH	NA	ND(0.150)	NA
NAPH	3.5	NA	1.118
1-METH	0.55	NA	ND(0.0161)
2-METH	0.57	NA	ND(0.0142)

MW-12	07/18/07	05/12/11	05/25/11
B	0.69	ND(0.249)	NA
T	<0.51	ND(0.201)	NA
E	5.5	ND(0.210)	NA
X	1.7	ND(0.26)	NA
MTBE	<0.44	ND(0.460)	NA
TRPH	NA	ND(0.150)	NA
NAPH	9.3	NA	4.58
1-METH	0.61	NA	0.368
2-METH	0.82	NA	0.610

MW-5	09/26/07	05/11/11	05/24/11	07/05/12
B	1.4	ND(0.249)	NA	NA
T	2.8	ND(0.201)	NA	NA
E	99	9.72	NA	NA
X	140	ND(0.26)	NA	NA
MTBE	<0.44	ND(0.460)	NA	NA
TRPH	NA	ND(0.150)	NA	NA
NAPH	30	NA	26.7	0.0990 U
1-METH	46	NA	3.17	0.110 U
2-METH	96	NA	4.68	0.0577 U

MW-11	09/26/07	05/10/11
B	3.0	ND(0.249)
T	23	ND(0.201)
E	240	ND(0.210)
X	330	ND(0.676)
MTBE	<0.44	ND(0.460)
TRPH	NA	ND(0.150)
NAPH	120	0.146
1-METH	75	0.0858
2-METH	160	0.141

MW-14	01/14/02	05/10/11
B	<1	ND(0.249)
T	<1	ND(0.201)
E	<1	ND(0.210)
X	<2	ND(0.676)
MTBE	1.22	ND(0.460)
TRPH	NA	ND(0.150)
NAPH	<5	0.0657
1-METH	<5	ND(0.0152)
2-METH	<5	0.115

RW-5	08/28/08	05/12/11	05/24/11	07/05/12
B	0.35	0.85	NA	NA
T	0.41	ND(0.201)	NA	NA
E	2.9	23.9	NA	NA
X	5.4	ND(0.26)	NA	NA
MTBE	NA	ND(0.460)	NA	NA
TRPH	NA	ND(0.000150)	NA	NA
NAPH	ND(0.031)	NA	49.9	5.86
1-METH	<0.028	NA	18.1	1.54
2-METH	<0.025	NA	17.0	1.37

RW-2	01/14/02	05/12/11	05/25/11
B	<1	ND(0.249)	NA
T	<1	ND(0.201)	NA
E	<1	ND(0.210)	NA
X	<2	ND(0.26)	NA
MTBE	<1	ND(0.460)	NA
TRPH	NA	ND(0.150)	NA
NAPH	<5	NA	0.114
1-METH	<5	NA	0.162
2-METH	<5	NA	0.0351

RW-4	08/28/08	05/11/11	05/24/11
B	0.28	ND(0.249)	NA
T	<0.3	ND(0.201)	NA
E	23.0	8.00	NA
X	0.7	0.48	NA
MTBE	NA	ND(0.460)	NA
TRPH	NA	ND(0.150)	NA
NAPH	<0.031	NA	0.319
1-METH	0.099	NA	13.2
2-METH	0.057	NA	6.05

MW-6	09/26/07	05/11/11	05/24/11
B	<5	ND(0.249)	NA
T	190	ND(0.201)	NA
E	1,100	22.1	NA
X	2,800	2.3	NA
MTBE	<4.4	ND(0.460)	NA
TRPH	NA	ND(0.150)	NA
NAPH	440	NA	0.0680
1-METH	46 I	NA	1.15
2-METH	98 I	NA	0.111

MW-10	09/26/07	05/10/11
B	9.6	ND(0.249)
T	50	ND(0.201)
E	1,100	ND(0.210)
X	1,100	ND(0.676)
MTBE	<1.8	ND(0.460)
TRPH	NA	ND(0.150)
NAPH	340	0.214
1-METH	16	ND(0.0152)
2-METH	26	0.281

RW-3	07/18/07	05/12/11	05/25/11
B	<0.5	ND(0.249)	NA
T	<0.51	ND(0.201)	NA
E	8.9	ND(0.210)	NA
X	1.2	ND(0.26)	NA
MTBE	<0.44	ND(0.460)	NA
TRPH	NA	ND(0.150)	NA
NAPH	<0.25	NA	0.0791
1-METH	<0.5	NA	0.108
2-METH	<0.5	NA	0.0416

MW-7	09/26/07	05/12/11	05/24/11	07/05/12
B	<0.50	ND(0.249)	NA	NA
T	<0.44	ND(0.201)	NA	NA
E	<0.44	ND(0.210)	NA	NA
X	<0.96	ND(0.26)	NA	NA
MTBE	<0.44	ND(0.460)	NA	NA
TRPH	NA	ND(0.150)	NA	NA
NAPH	400	NA	33.4	4.39
1-METH	96 I	NA	1.2	2.36
2-METH	190 I	NA	23.9	3.16

MW-17	07/07/11
B	ND(0.249)
T	0.234 I
E	ND(0.210)
X	ND(0.26)
MTBE	ND(0.460)
TRPH	NA
NAPH	0.204
1-METH	ND(0.0161)
2-METH	ND(0.0142)

MW-16D	01/15/02	05/12/11	05/25/11
B	<1	ND(0.249)	NA
T	<1	ND(0.201)	NA
E	<1	ND(0.210)	NA
X	<2	ND(0.26)	NA
MTBE	1.2	ND(0.460)	NA
TRPH	NA	ND(0.150)	NA
NAPH	<5	NA	0.0565
1-METH	<5	NA	(ND(0.0161)
2-METH	<5	NA	ND(0.0142)

MW-8	09/26/07	05/10/11
B	7.2	
T	1.4 I	
E	240	
X	140	
MTBE	0.9	NL
TRPH	NA	
NAPH	160	
1-METH	39	
2-METH	69	

MW-8R	07/07/11
B	0.437 I
T	0.233 I
E	3.34
X	0.52 I
MTBE	ND(0.460)
TRPH	NA
NAPH	ND(0.0138)
1-METH	ND(0.0161)
2-METH	ND(0.0142)

MW-2	08/28/08	05/10/11	07/05/12
B	2.8	10.4	6.65
T	7.0	ND(4.03)	2.55
E	880	1,130.0	581
X	310	36.0	19.8
MTBE	NA	ND(9.20)	2.14 U
TRPH	NA	2.70	NA
NAPH	120	293.0	145
1-METH	130	51.7	14.3
2-METH	81	101.0	24.3

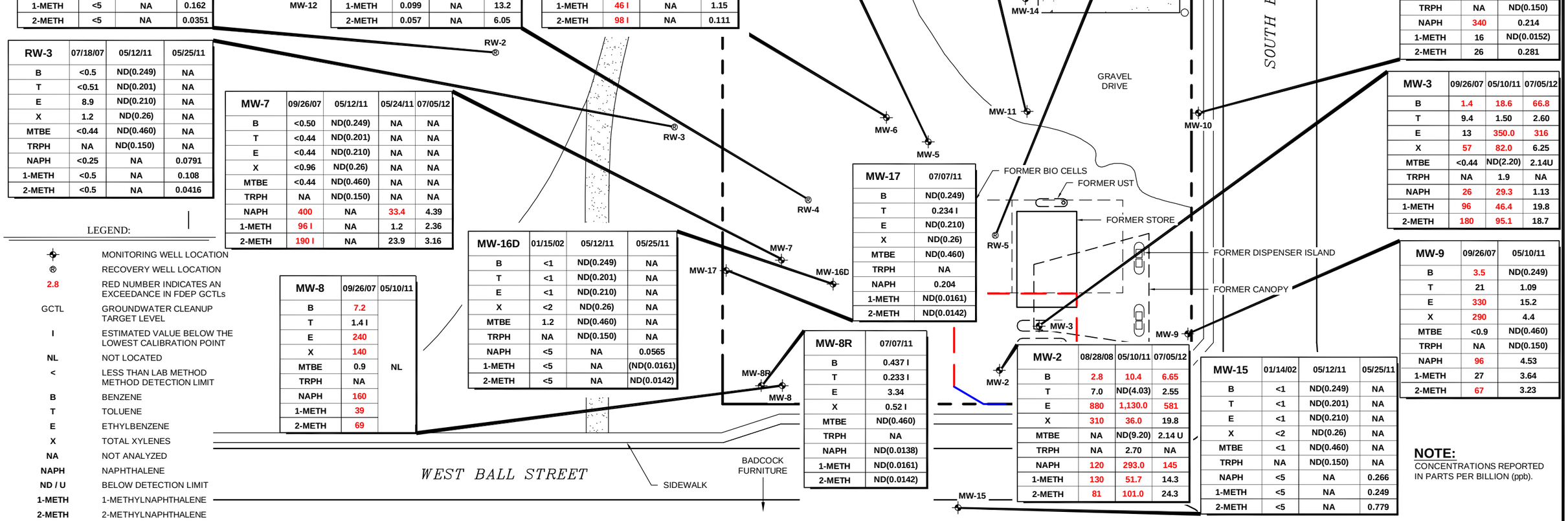
MW-15	01/14/02	05/12/11	05/25/11
B	<1	ND(0.249)	NA
T	<1	ND(0.201)	NA
E	<1	ND(0.210)	NA
X	<2	ND(0.26)	NA
MTBE	<1	ND(0.460)	NA
TRPH	NA	ND(0.150)	NA
NAPH	<5	NA	0.266
1-METH	<5	NA	0.249
2-METH	<5	NA	0.779

MW-3	09/26/07	05/10/11	07/05/12
B	1.4	18.6	66.8
T	9.4	1.50	2.60
E	13	350.0	316
X	57	82.0	6.25
MTBE	<0.44	ND(2.20)	2.14U
TRPH	NA	1.9	NA
NAPH	26	29.3	1.13
1-METH	96	46.4	19.8
2-METH	180	95.1	18.7

MW-9	09/26/07	05/10/11
B	3.5	ND(0.249)
T	21	1.09
E	330	15.2
X	290	4.4
MTBE	<0.9	ND(0.460)
TRPH	NA	ND(0.150)
NAPH	96	4.53
1-METH	27	3.64
2-METH	67	3.23

LEGEND:

⌖	MONITORING WELL LOCATION
®	RECOVERY WELL LOCATION
2.8	RED NUMBER INDICATES AN EXCEEDANCE IN FDEP GCTLs
GCTL	GROUNDWATER CLEANUP TARGET LEVEL
I	ESTIMATED VALUE BELOW THE LOWEST CALIBRATION POINT
NL	NOT LOCATED
<	LESS THAN LAB METHOD METHOD DETECTION LIMIT
B	BENZENE
T	TOLUENE
E	ETHYLBENZENE
X	TOTAL XYLENES
NA	NOT ANALYZED
NAPH	NAPHTHALENE
ND / U	BELOW DETECTION LIMIT
1-METH	1-METHYLNAPHTHALENE
2-METH	2-METHYLNAPHTHALENE



SCALE: 1"=40'
(Approximate)

NOTE:
CONCENTRATIONS REPORTED IN PARTS PER BILLION (ppb).

Z:\City of Plant City\716806 - Hydraulic Hose Shop and Former Gas Station\CG-SRRPT\716806-SRRPT.dwg, 4a Hydrocarbons in GW, 10/9/2012 2:42:20 PM, mike rawls

PPM CONSULTANTS, INC.

DRAWN BY:	DRAWN DATE:
MLR	09/28/12
PROJECT NUMBER:	BILLING GROUP:
716806	SRRPT

CITY OF PLANT CITY COMMUNITY REDEVELOPMENT AGENCY

FORMER HYDRAULIC HOSE / JWH, LTD-TELCO OIL
617-619 SOUTH EVERS STREET
PLANT CITY, FLORIDA

DISSOLVED HYDROCARBON CONCENTRATION MAP (2002 TO 2012)

FIGURE NUMBER
4A