Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # 17-761.900(2)
Form Title Storage Tank Registration Form
Effective Date December 10, 1990
DER Application No. (Filled in by DER)

Storage Tank Registration Form

RECEIVED D.E.R.
93 MAR 10 PM 2:17
STORAGE TANK REGULATION

Please Print or Type - Review Instructions Before Completing Form

1. DER Facility ID Number: 418510278
2. Facility Type:
3. New Registration ☐ New Owner Data ☐ Facility Revision ☐ Tank(s) Revision ☒ Code updating only
4. County and Code of tank(s) location: MANATEE / 41

DATA ENTERED
MAR 29 1993
LAURIE GINGER

5. Facility Name: Chevron Facility #48008
   Tank(s) Address: 520 1st ST.
   City/State/Zip: BRADENTON
   Contact Person: ARTHUR Rudolph Telephone: (813) 746-4392
6. Financial Responsibility Type: C

7a. Tank(s) Owner: Chevron USA Products
   Owner Mailing Address: P.O. Box 1706
   City/State/Zip: ATLANTA, GA. 30301
   Contact Person: Cheryl TenEyck Telephone: (404) 984-3000

7b. New Owner Signature/Change Date: / /

8. Location (optional) Latitude: 27 • 29 • 39 " Longitude: 82 • 33 • 49 " Section: 26 Township: 34S Range: 17E

Complete One Line For Each Tank At This Facility (Use Codes - See Instructions)

Complete 9 - 16 for tanks in use; 9 - 19 for tanks out of use.

9	10	11	12	13	14	15	16	17	18	19
1	10,000	B	01/82	U	AEMO	C	B			
2	10,000	B	01/82	U	AEMO	C	B			
3	10,000	B	01/82	U	AEMO	C	B			
4	10,000	B	01/82	U	AEMO	C	B	T		

20. _____ Certified Contractor* DPR# _____ Department of Professional Regulation License Number*

*For new tank installation or tank removal

To the best of my knowledge and belief all information submitted on this form is true, accurate and complete.

L. A. Levitt Operations Supv — Signature — 3-1-93

Print name & title of owner or authorized person — Signature — Date

Northwest District 160 Governmental Center
Northeast District 7825 Baymeadows Way, Suite B 200
Central District 3319 Maguire Blvd. Suite 232
Southwest District 4520 Oak Fair Blvd. Tampa, Florida 33610-7347
South District 2269 Bay St. Fort Myers, Florida 33901-2696
Southeast District 1900 S. Congress Ave., Suite A West Palm Beach, Florida 33406

48008

B10

Department of Environmental Regulation

Stationary Tank Registration/Notification Form

Form 17-1.218(2)

RECEIVED
D.E.R.
91 MAR -4 PM 12:18
STORAGE TANK
REGULATION

DATA ENTERED
MAR 8 1991
BY

CHEVRON
520 1ST STREET W
BRADENTON FL 33508

(Make corrections to name and addresses here)
1. Facility/Addressee name
Facility address
Mailing address

FACILITY LOCATION
ADDRESS: 520 1ST STREET W
CITY: BRADENTON FL 33508

Use this form to comply with the following requirements of the Stationary Tank Rule Chapter 17-61, Florida Administrative Code.

1. Each owner or operator shall register the following with the department
   a. All existing facilities by December 31, 1984 (Questions 1-19)
   b. All new storage systems or facilities at least 10 days prior to the start of installation of tanks except in the cases of emergency replacement (Questions 1-19)
   c. A non-pollutant containing installation which is to be converted to a facility at least 10 days prior to the placement of pollutants in such a facility (Questions 1-19)
2. Each owner or operator shall notify the department of the following
   a. All storage systems within 10 days of abandonment (Questions 1-12, 16, 20)
   b. Facility sale within 10 days of sale. Notice shall be made by the seller (Answer questions 1-7, and 11. Question 7 about the new owner.)
   c. Retrofitting within 10 days of completion (Questions 1-19)
3. You may notify the department of a change of operator (Questions 1-6)

22596 Agency Use Only

AGR038950000 DOR080038950

PLEASE PRINT OR TYPE

2. Facility number (DER will provide this number) 418510 778 3. Date
4. Federal Employment Identification (number used to file IRS forms)
5. County Code (see enclosed letter) 41
6. Operator of facility ARTHUR RANDOLPH
   Effective date (only for change of operator) 2-1-85 Telephone number (813) 746-4392
7. Company/Person owning tanks and piping CHEVRON, INC
   Address P.O. Box 1706 ATLANTA, GA 30301
   Contact person T.I.P. COORDINATOR Telephone number (404) 984-3000
   Effective date (only for change of owner)
8. How many tanks at this location have an individual storage capacity of greater than 550 gallons and store vehicular fuel made from petroleum?
   5 Underground ____ Aboveground
9. Facility location Latitude 27°29'39" Longitude 82°33'49" Section 26 Township 34S Range 17E
   This information is listed on property deeds, and in the offices of the property appraiser and tax assessor.
10. Sketch the facility on a separate page showing the APPROXIMATE location of buildings, tanks, and dispensers.
   A. Draw a line from tank to dispenser to show which are connected by piping.
   B. Label each tank as Tank 1, Tank 2, etc.
   C. Write the date and your facility number, if known, or name and address exactly as it appears above.
   D. Keep a copy of your sketch.

REFER TO TANKS BY THESE LABELS IN ANY COMMUNICATION WITH THE DEPARTMENT
DESCRIBE PIPING BY THE NUMBER OF THE TANK IT IS ATTACHED TO

11. TO THE BEST OF MY KNOWLEDGE AND BELIEF ALL INFORMATION SUBMITTED ON THIS FORM IS TRUE, ACCURATE, AND COMPLETE

Name of owner, operator or authorized representative

Signature of owner, operator or authorized representative

KEEP A COPY OF THIS FORM FOR YOUR RECORDS

MAIL TO: DER Stationary Tank Registration
2600 Blair Stone Road
Room 603
Tallahassee, Florida 32301

update mailed
3/22/89
& 6.23.89
9.25 90
2-27-91

DER FORM 17-1.218(2) 8-1-84 (1-2)

DER FORM 17-1.218(2) 9/1/84 (2/2)

INSTRUCTIONS: Use one row across for each tank counted in question 8. The tank number must agree with the number on the sketch of your facility. A new tank installed where a registered tank was removed should be given the number of the removed tank with an R and a number added. Example. Tank 3R1 is first replacement for tank 3. It is in the same place where tank 3 was. Tank 3R2 is the second replacement for tank 3. Attach extra pages if necessary. Write your facility number, if known, or name and address, exactly as it appears on the front of the form, on all extra pages.

(12) Tank Number	(13) Tank Size in Gallons	(14) Tank Contents (see List 14 below)	(15) Tank Installation Date. Month/Year (put X if unknown)	(16) Underground or Aboveground Tank (write U or A)	(17) Tank Construction Specifics (see List 17U or 17A below)	(18) Integral Piping System Construction Specifics (see List 18 below)	(19) Monitoring System Type (see List 19)	(20) Tank Disposal Method (see List 20)
* 1	10000	B	1982	U	E	C	B	B
2	↓	B	↓	↓	A	↓	↓	↓
3		B			A			
4		B			A			
5	1000	Z						
5	1000	Removed in	12/87					
* on	February 20, 1991	tank #1 was	converted	from Diesel	fuel to	Regular Unleaded		

ENTER THE LETTERS WHICH APPLY TO EACH TANK IN THE BOXES ABOVE. **WRITE ALL THAT APPLY.**

List 14

Tank contents are:

A. leaded gasoline.
B. unleaded gasoline.
C. Alcohol enriched gasoline.
D. diesel fuel.
E. aviation fuel.
Z. other.

List 17U
UNDERground Tanks

Underground tank:

A. has overfill protection.
B. is interior lined.
C. is painted/asphalted steel.
D. is of unknown type.
E. is fiberglass type.
F. is fiberglass-clad steel.
G. is sacrificial anode type.
H. is impressed current type.
I. is double walled.
J. is concrete.
K. is in secondary containment.
N. is or has none of the above.

List 17A
ABOVEground Tanks

Aboveground tank:

O. has overfill protection.
P. is surrounded by impervious dike.
Q. is surrounded by earth dike.
R. rests on an inpervious base.
S. rests on a earth/gravel base.
T. has interior lined bottom.
U. is cathodically protected.
V. is built of/coated with corrosion resistant materals.
W. is supported above the soil.
Z. is or has none of the above.

List 18

Integral Piping System has:

A. no parts in contact with the soil.

Parts contacting the soil which are:

B. unprotected metal.
C. built of corrosion resistant materials.
D. corroson resistant coated.
E. cathodically protected.
F. double-walled.
G. within a secondary containment.
H. interior lined.
M. none of the above.

List 19

Monitoring system is:

A. automatically sampled well(s).
B. manually sampled well(s).
C. groundwater monitoring plan.
D. SPCC plan.
E. well/detector in secondary containment.
F. in-ground detector.
G. within walls of double-walled tank.
H. continuous in piping.
I. not required.
N. none of the above.

List 20

Tank **disposal** method.

A. Filling.
B. Removal.
C. Retrofitting.
F. Other.

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DEPARTMENT OF
ENVIRONMENTAL PROTECTION
2004 MAY 14 A 10:40
BUREAU OF PETROLEUM
STORAGE SYSTEMS
DOCUMENT MANAGEMENT
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D.E.P.
MAY 06 2004
Southwest District Tampa

LIMITED SITE ASSESSMENT REPORT
FORMER MCNITT CHEVRON
520 FIRST ST.
BRADENTON, FLORIDA, FDEP
FACILITY I.D.# 8510778

BUREAU OF PETROLEUM
STORAGE SYSTEMS
MAY 14 2004
PETROLEUM CLEANUP
SECTION 4

Andreyev Engineering, Inc.

ST. PETERSBURG OFFICE
3740 54th Avenue North
St. Petersburg, Florida 33714
727-527-5735
Fax: 727-527-6084

▼ Groundwater ▼ Environmental ▼ Geotechnical ▼ Construction Materials Testing

April 13, 2004
AEI Project No.: APEN-04-03

D.E.P.
MAY 0 6 2004
Southwest District Tampa

TO: **Manatee County Environmental Management**
202 Sixth Avenue East
Bradenton, Florida 34208

Attention: Mr. Paul Panik

SUBJECT: *Limited Site Assessment Report, Former McNitt Chevron, 520 First Street West, Bradenton, Manatee County, Florida, FDEP Facility I.D.# 8510778*

Dear Mr. Panik:

Andreyev Engineering, Inc. (AEI) has completed the Limited Site Assessment for the subject facility located at 520 First Street West, Manatee County, Florida. Two copies have been provided for your use. This report summarizes the assessment activities conducted in April, 2004.

Should you have questions or require additional information, please do not hesitate to contact our office at (727) 527-5735.

Sincerely,

ANDREYEV ENGINEERING, INC.

Mark D. Richter, P.G.
Project Geologist

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Table 2 Summary of Selected Soil Analytical Parameters
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APPENDICES

Appendix A Limited Closure Assessment Report, Andreyev Engineering, 2003
Appendix B Groundwater Sampling Report, CBM Environmental Services, 2002
Appendix C Laboratory Analytical Results
Appendix D Groundwater Sampling Logs

STATEMENT OF PROFESSIONAL REVIEW

The Limited Site Assessment Report for the former McNitt Chevron, located at 520 First Street West in Bradenton, Manatee County, Florida, has been prepared by a Professional Geologist registered in the State of Florida. This report has been determined to be in accordance with professional practices pursuant to Chapter 492 of the Florida Statutes and Chapter 62-761, FAC.

Mark D. Richter

Mark D. Richter
Project Geologist
Florida Registration #PG2296

Signed this 27th day of April, 2004

1.0 INTRODUCTION AND PURPOSE

The objective of this assessment was to evaluate the presence of petroleum contaminated groundwater within and down gradient of the former gasoline UST area on-site and to evaluate the presence of petroleum contaminated soils within the former UST area. The following summary of activities completed is provided:

- Monitoring Well Installation: Five (5) temporary monitoring wells (TMW-1 through TMW-5) were installed to determine the presence of dissolved hydrocarbons. The monitoring wells were installed to depths of between 10 and 12 feet below the ground surface in and around the former UST area.

- Soil Sampling: A total of eleven (11) soil borings were conducted to depths of 9 feet below the ground surface in and around the former gasoline UST area. During the drilling of the borings, soil samples were collected for field screening using an organic vapor analyzer (OVA). In addition, a single soil sample was collected and analyzed for EPA Methods 8100, 8021 and FL-PRO parameters.

- Groundwater Sampling: Groundwater samples were collected from monitoring wells TMW-1 through TMW-5 on April 7 and 12, 2004, for laboratory analyses. The samples collected were analyzed for EPA Method 8021, 8100, FL-Pro and lead parameters. The sampling activities were conducted in accordance with procedures and methods detailed in the FDEP's Standard Operating Procedure SOP-001/01.

- Groundwater and Soil Laboratory Analyses: Laboratory analyses for the April 7 and 12, 2004, sampling events were conducted by PC&B Environmental Laboratories in Oviedo, Florida.

- Groundwater Flow Determination: Water level measurements were obtained from four temporary monitoring wells on April 7, 2004 in order to determine the shallow groundwater flow direction at the site.

- Summary of Results: The laboratory analytical results were reviewed and summarized with respect to guidance concentrations specified in Chapters 62-550, 62-770 and 62-777, FAC.

2.0 SITE LOCATION AND DESCRIPTION

2.1 Site Location and Description

The subject site consists of commercial property currently developed with a single-story Eckerd Drug Store and associated paved parking areas. The site is located at 520 First Street West in Bradenton, Manatee County, Florida. The site lies entirely in Section 26, Township 34 South, Range 17 East, as shown on the "Bradenton, Florida " USGS Map, included as **Figure 1**.

2.2 Site Background

The McNitt Chevron facility formerly operated as a retail gasoline distributor located at 520 First Street West in Bradenton, Florida. The gas station building was demolished and the USTs removed in March, 2003. This facility utilized three (3) 10,000 gallon gasoline fiberglass USTs and one (1)10,000 gallon diesel fiberglass UST. These tanks were removed on March 3 and 4, 2003. In addition, two (2) 2,500 gallon steel USTs formerly closed in place and filled with concrete were removed from this facility on March 10, 2003. The gasoline USTs were located to the south of the current Eckerd building. A copy of the Limited Closure Assessment Report is included as **Appendix A**.

The McNitt Chevron facility reported a petroleum discharge on May 9, 1990 based on petroleum odors detected in compliance wells during an annual compliance inspection. This facility applied to the State's Petroleum Cleanup Participation (PCP) program and was determined eligible on May 21, 2001. Groundwater sampling associated with an On-Site Environmental Audit (OSEA) performed in December of 1994, included analysis of twelve on-site monitoring wells. Based on the results of this analysis, elevated levels of ethylbenzene and zylenes were detected in monitoring well MW-9, located on the southeastern portion of the subject site. The levels of ethylbenzene and zylenes exceeded the FDEP Groundwater Cleanup Target Levels (GCTLs).

Additional groundwater sampling was conducted at this facility by CBM Environmental Services, Inc. in March of 2002. A total of twelve on-site monitoring wells were sampled for various petroleum constituents. The results of laboratory analysis on the collected groundwater samples indicated levels of methyl-tert-butyl-ether (MTBE) of 7.65 and 56.9 ug/L in monitoring wells CW-1 and CW-2, respectively, located to the north of the gasoline UST area. The FDEP GCTL for MTBE is 50 ug/L. There were no other wells sampled which detected contaminant levels which exceeded the GCTLs. A copy of the Groundwater Sampling Report is included as **Appendix B**.

3.0 ASSESSMENT METHODOLOGY AND RESULTS

3.1 Soil Sampling and Analysis Results

In order to investigate the presence of petroleum impacted soils a total of eleven (11) shallow soil borings (SB-1 through SB-11) were conducted in and around the former gasoline UST area on April 7 and 12, 2004. Samples were collected on 1 foot intervals using a decontaminated 3-½ inch decontaminated hand auger. The groundwater was encountered at about 6.0 to 9.0 feet below the surface. The samples were field screened for the presence of hydrocarbon vapors with a calibrated Heathtech Detecto-Pak III Organic Vapor Analyzer (OVA). Soil samples exhibiting an OVA response greater than 10 parts per million were also screened for methane from the original sample container using an in-line carbon filter. The soils collected were also visually screened for petroleum staining. The locations of the borings are shown on **Figure 2**. The OVA soil screening activities were conducted to assess the presence of excessively contaminated soil on-site. There were no soils analyzed that produced OVA readings which exceeded background levels (10 ppm). The OVA results are summarized in **Table 1**.

During the headspace screening a single soil sample was collected for laboratory analysis in order to confirm the OVA results. The sample was collected from soil boring SB-2 at a depth of about 8 feet below the ground surface based on positive OVA readings (5 ppm) which were detected at this location. The soil sample was collected in accordance with procedures and methods detailed in the FDEP's Standard Operating Procedure SOP-001/01. The laboratory analyses were performed by PC&B Environmental Laboratories, Inc. in Oviedo, Florida for EPA Method 8100, 8021 and FL-PRO parameters. Based on the soil analysis results, there were no EPA Method 8100, 8021 or FL-PRO parameters detected which exceeded the laboratory detection limits. The soil analytical data is summarized on **Table 2** and a copy of the laboratory report is included in **Appendix C.**

3.2 Monitoring Well Installation

Temporary monitoring wells TMW-1 through TMW-4 were installed by AEI on April 7, 2004 around the perimeter of the former UST area. Temporary monitoring well TMW-5 was installed by AEI on April 12, 2004 in the center of the former UST area. The monitoring wells were installed to depths of between 10 and 12 feet, and constructed with flush joint, 2-inch diameter, Schedule 40 PVC coupled to five feet of .010-inch slotted well screen. The installation of TMW-1 through TMW-4 was performed with a 3-½ inch decontaminated hand auger and the installation of monitoring well TMW-5 was performed with a drill rig using 4-¼ inch I.D. hollowstem augers, without the use of drilling mud. The annular space was filled with a 20/30 silica sand pack filter pack. Upon completion of groundwater sampling the wells were removed and the boreholes backfilled to land surface. During the monitoring well installation activities, the shallow groundwater was encountered at depths of between 6 and 9 feet below the surface. The approximate locations of monitoring wells TMW-1 through TMW-5 are shown in **Figure 3**. Monitoring well construction details are shown on **Figures 4 and 5**.

3.3 Groundwater Elevation Survey and Flow Determination

Upon completion of the installation of monitoring wells TMW-1 through TMW-4, a groundwater elevation survey was completed. The top-of-casings of all wells were surveyed using a datum set at a temporary bench mark set in the parking area. The bench mark elevation was set to an arbitrary value of 10.00 feet. In order to determine the direction of groundwater flow, water levels were measured in each of the monitoring wells to the top-of-casings to the nearest hundredth of a foot with a water level indicator. Based on the water level measurements obtained on April 7, 2004, the groundwater flow direction at the site is generally in an east-northeast direction. The April 7, 2004, groundwater elevation data is summarized on **Table 3** and shown on **Figure 6.**

3.4 Groundwater Sampling and Analyses Results

Groundwater sampling was conducted by AEI on April 7 and 12, 2004, in accordance with procedures and methods detailed in the FDEP's Standard Operating Procedure SOP-001/01. The groundwater laboratory analyses were performed by PC&B Environmental Laboratories, Inc. in Oviedo, Florida for EPA Method 8021, 8100, FL-Pro and lead parameters. Standard field methodologies require that at least three well volumes of water be purged from the well prior to sampling. Field parameters, including pH, conductivity, turbidity, dissolved oxygen and temperature, were recorded at various intervals during the purging of each well. Samples were collected after at least three well volumes were purged and the field parameters had stabilized. This methodology indicates that groundwater samples collected are representative of aquifer conditions. All samples were collected with a peristaltic pump. The EPA Method 8021 samples were collected from the inlet hose prior to the groundwater entering the pump. The groundwater analytical data is summarized on **Table 4** and a copy of the laboratory report is included in **Appendix C**.

The groundwater samples collected from monitoring wells TMW-1 through TMW-5 detected no EPA method 8021, 8100, FL-Pro or lead parameters which exceeded the laboratory detection limits. A copy of the groundwater sampling logs is included in **Appendix D**.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the results of this study no detectable levels of dissolved hydrocarbons were detected in monitoring wells TMW-1 through TMW-5, installed in and around former tank area, in April of 2004. In addition, no evidence of petroleum impacted soils was detected in the former UST area.

4.1 Source Identification and Excessively Contaminated Soil Evaluation

In order to investigate the presence of petroleum impacted soils a total of eleven (11) shallow soil borings were conducted in and around the former UST area. There were no soils analyzed that produced OVA readings which exceeded background levels (10 ppm). During the headspace screening a single soil sample was collected for laboratory analysis in order to confirm the OVA results. Based on the soil analysis results, there were no EPA Method 8100, 8021 or FL-PRO parameters detected which exceeded the laboratory detection limits.

4.2 Free Product Occurrence

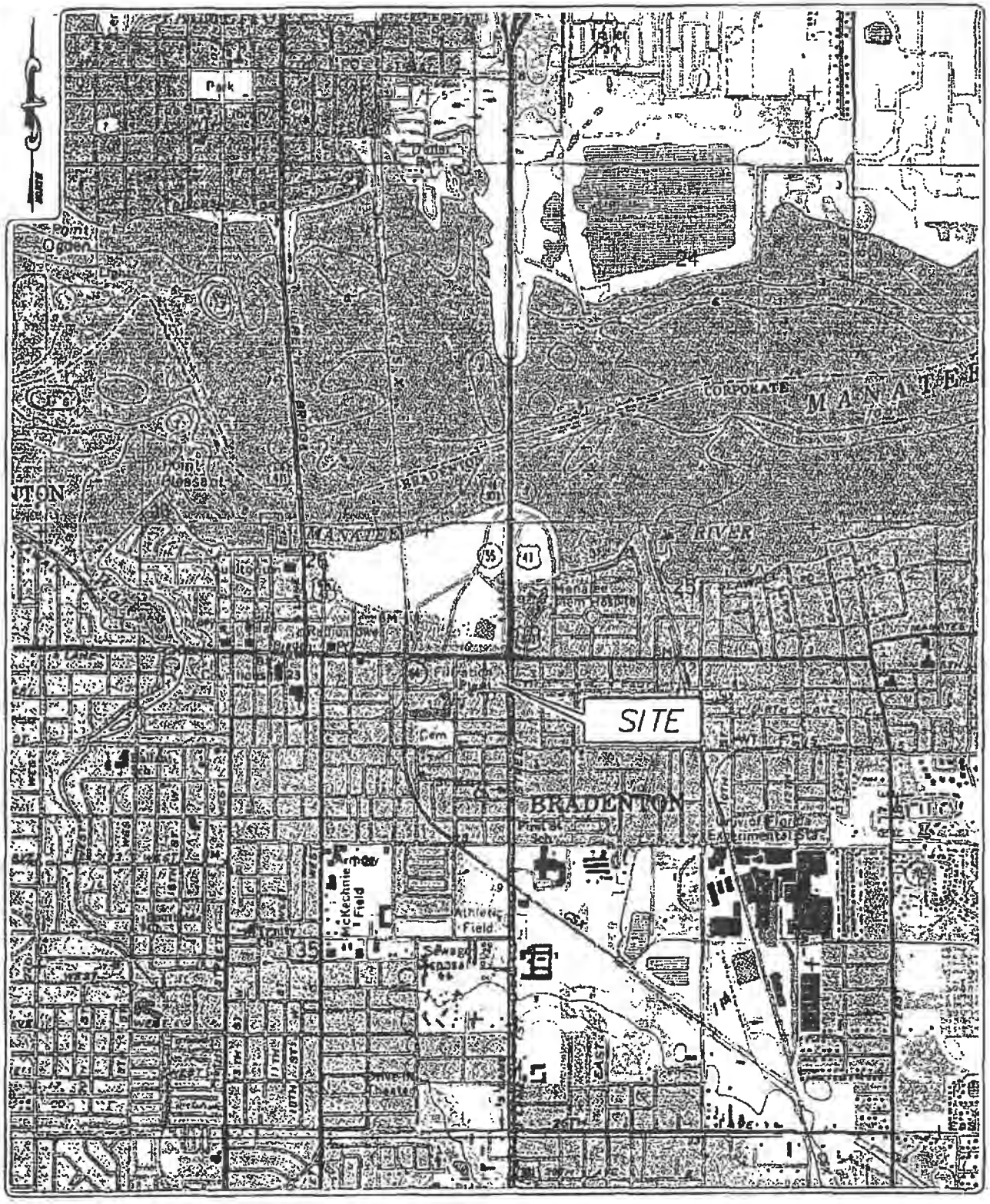
No free petroleum product was detected or present in any of the monitoring wells installed or sampled as part of the assessment activities conducted by AEI in April, 2004.

4.3 Dissolved Hydrocarbons

Five (5) shallow groundwater monitoring wells (TMW-1 through TMW-5) were installed in and around the former UST area for the purpose of evaluating the presence of dissolved hydrocarbons in the shallow aquifer. Laboratory analyses of groundwater samples collected from these wells detected no EPA method 8021, 8100, FL-Pro or lead parameters which exceeded the laboratory detection limits.

4.4 Recommendations

Based on the results of this assessment, we respectfully request that a "No Further Action" disposition be approved for this site.



REFERENCE:
U.S.G.S. BRADENTON, FLA.
QUADRANGLE MAP
DATED 1964
PHOTOREVISED 1987
SECTION 26
TOWNSHIP 34 SOUTH
RANGE 17 EAST

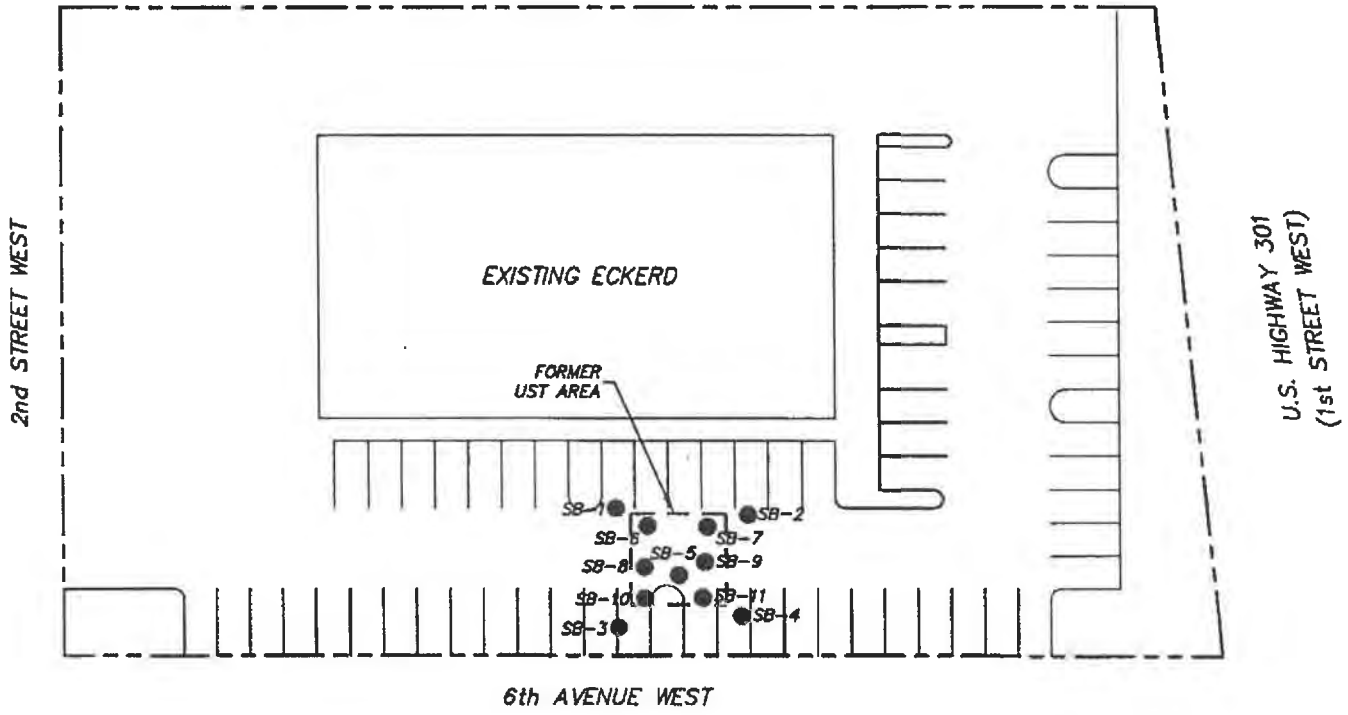
Andreyev Engineering, Inc.

LIMITED SITE ASSESSMENT
FORMER MCNITT CHEVRON
520 1st STREET WEST
BRADENTON, MANATEE COUNTY, FL.

SCALE:	DATE: 04/13/04	GEOLOGIST: MR
1"=2000'	PN: APGT-04-030	DRAWN BY: DS

U.S.G.S. TOPOGRAPHIC MAP

FIGURE 1



LEGEND:

● SOIL BORING LOCATION

0 25 50 100 200

SCALE IN FEET

Andreyev Engineering, Inc.

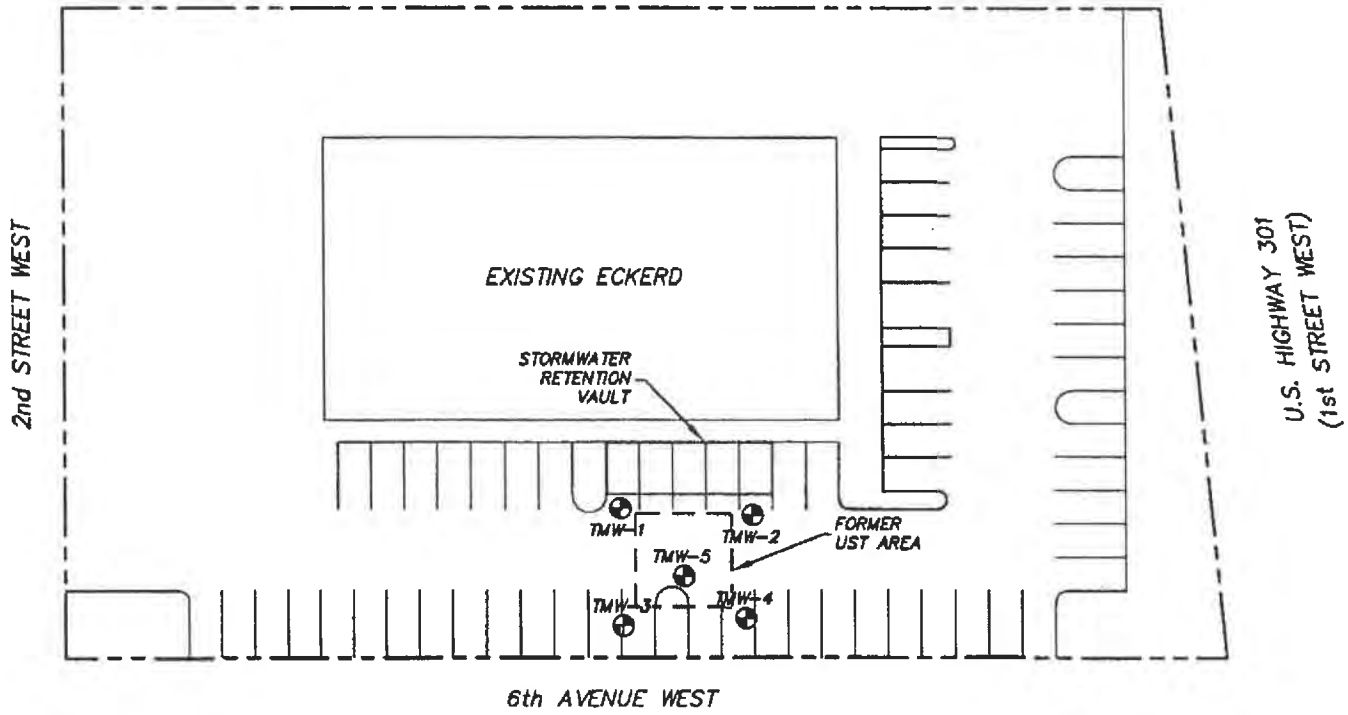
LIMITED SITE ASSESSMENT

FORMER MCNITT CHEVRON
520 1st STREET WEST
BRADENTON, MANATEE COUNTY, FL.

SCALE:	DATE: 04/13/04	GEOLOGIST: MR
1"=50'	PN: APEN-04-036	DRAWN BY: DS

SOIL BORING LOCATION PLAN

FIGURE 2



LEGEND:

TEMPORARY MONITOR WELL LOCATION

0 25 50 100 200

SCALE IN FEET

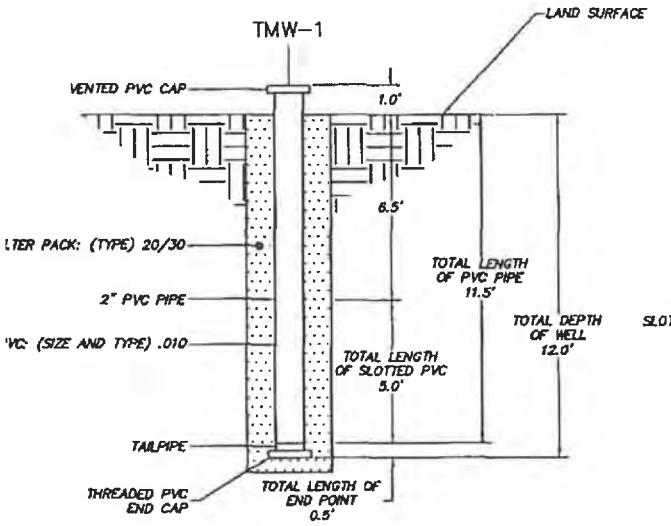
Andreyev Engineering, Inc.

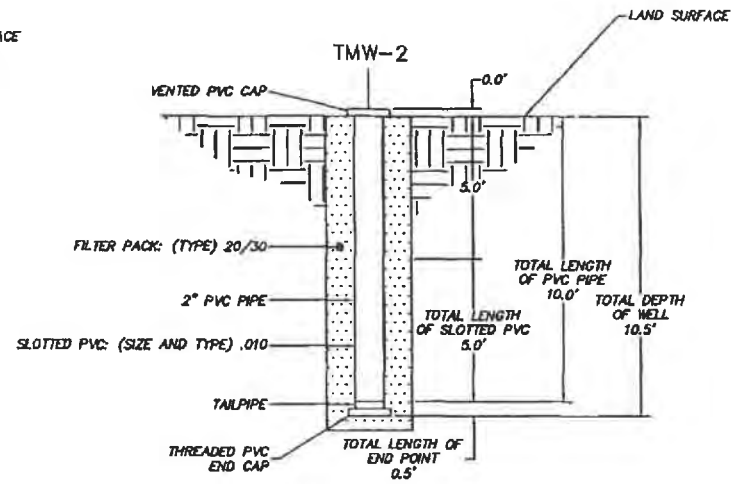
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	PN: APEN-04-036	DRAWN BY: DS

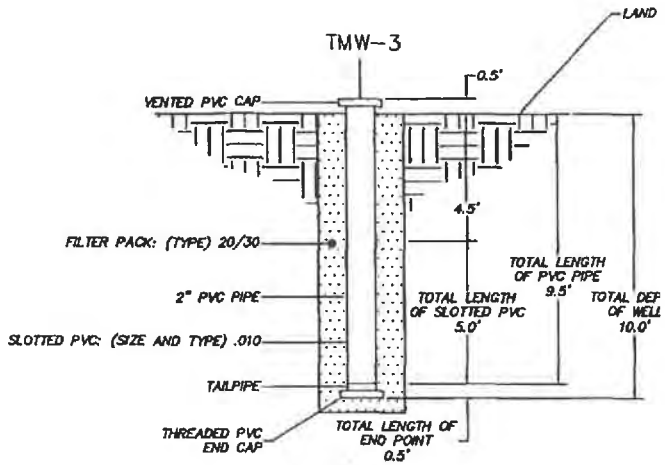
LIMITED SITE ASSESSMENT
FORMER MCNITT CHEVRON
520 1st STREET WEST
BRADENTON, MANATEE COUNTY, FL.

MONITOR WELL LOCATION PLAN

FIGURE 3







TMW-1 Lithology	
DEPTH	DESCRIPTION
0' to 2.0'	BROWN-GRAY SLIGHTLY SILTY FINE SAND
2.0' to 12.0'	BROWN SLIGHTLY SILTY FINE SAND

TMW-2 Lithology	
DEPTH	DESCRIPTION
0' to 1.0'	BROWN FINE SAND
1.0' to 3.0'	BROWN GRAY SLIGHTLY SILTY FINE SAND
3.0' to 10.5'	BROWN SLIGHLTY SILTY FINE SAND

TMW-3 Lithology	
DEPTH	DESCRIPTION
0' to 2.0'	BROWN GRAY SLIGHTLY SILTY FINE SAND
2.0' to 8.0'	BROWN SLIGHTLY SILTY FINE SAND
8.0' to 10.0'	LIGHT BROWN FINE SAND

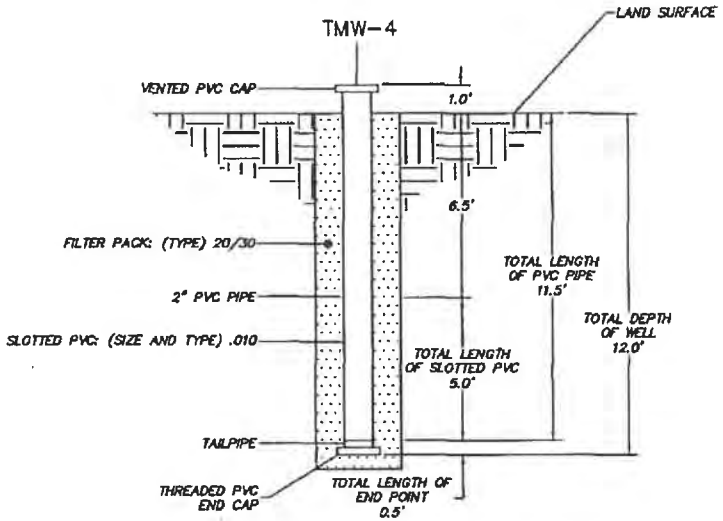
Andreyev Engineering, Inc.

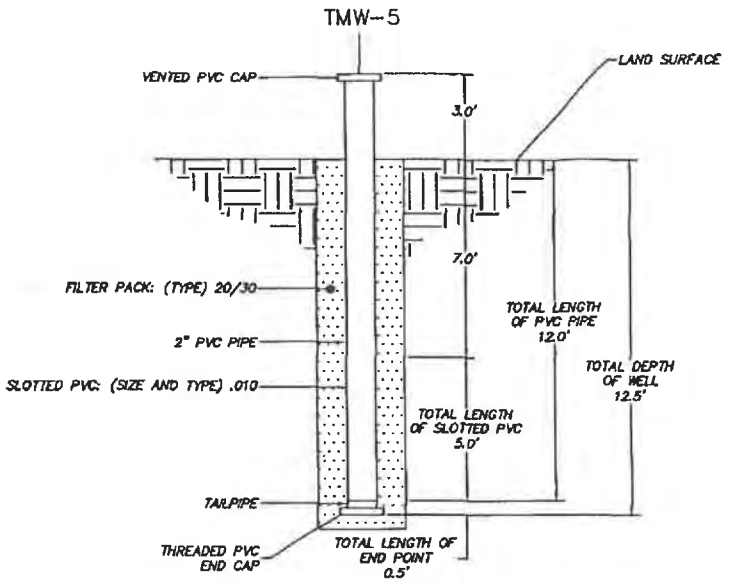
LIMITED SITE ASSESSMEN
FORMER MCNITT CHEV
520 1st STREET WE
BRADENTON, MANATEE COUN

SCALE:	DATE: 04/22/04	GEOLOGIST: MR
AS SHOWN	PN: APEN-04-036	DRAWN BY: DS

TEMPORARY MONITORING WELL DETAILS

FIGURE 4





TMW-4 Lithology	
DEPTH	DESCRIPTION
0' to 3.0'	BROWN GRAY SLIGHTLY SILTY FINE SAND
3.0' to 10.0'	BROWN SLIGHTLY SILTY FINE SAND
10.0' to 12.0'	LIGHT BROWN FINE SAND

TMW-5 Lithology	
DEPTH	DESCRIPTION
0' to 3.0'	BROWN GRAY SLIGHTLY SILTY FINE SAND
3.0' to 8.0'	WHITE PEA GRAVEL
8.0' to 12.5'	BROWN SLIGHTLY SILTY FINE SAND

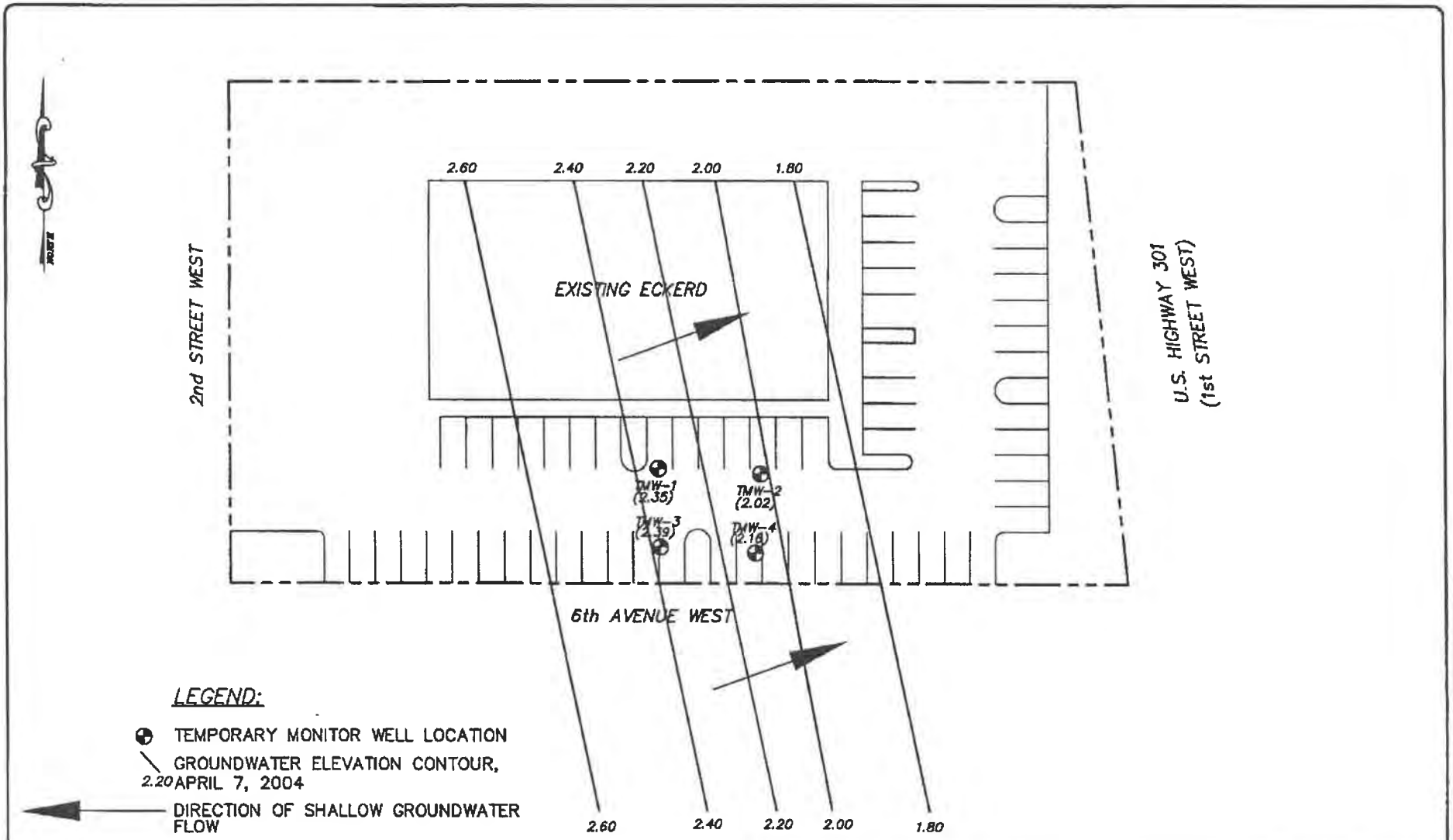
Andreyev Engineering, Inc.

LIMITED SITE ASSESSMEN
FORMER MCNITT CHEV
520 1st STREET WE
BRADENTON, MANATEE COUNT

SCALE:	DATE: 04/22/04	GEOLOGIST: MR
AS SHOWN	PN: APEN-04-036	DRAWN BY: DS

TEMPORARY MONITORING WELL DETAILS

FIGURE 5



Andreyev Engineering, Inc.

LIMITED SITE ASSESSMENT
FORMER MCNITT CHEVRON
520 1st STREET WEST
BRADENTON, MANATEE COUNTY, FL.

SHALLOW GROUNDWATER CONTOUR MAP

SCALE:	DATE: 04/13/04	GEOLOGIST: MR
1"=50'	PN: APEN-04-036	DRAWN BY: DS

FIGURE 6

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 28 2004

Mr. Chris Slemi
Eckard Corporation
8333 Bryan Dairy Road
Largo, Florida 33777-1230

Subject: Site Rehabilitation Completion Order
Former McNitt Chevron
520 1st Street West
Bradenton, Manatee County
FDEP Facility ID#418510778
Discharge Date: May 9, 1990 (PCPP)
Discharge Score: 9

Dear Mr. Slemi:

The Bureau of Petroleum Storage Systems has reviewed the Limited Contamination Assessment Report (LCAR) and No Further Action Proposal (NFAP) dated April 13, 2004 (received May 14, 2004), prepared and submitted by Andreyev Engineering, Inc., for the petroleum product discharge discovered at the above referenced facility. Documentation submitted with the NFAP confirms that criteria set forth in Rule 62-770.680(1), Florida Administrative Code (F.A.C.), have been met. The NFAP is hereby incorporated by reference in this Site Rehabilitation Completion Order (Order). Therefore, you are released from any further obligation to conduct site rehabilitation at the site for petroleum product contamination associated with the discharge listed above, except as set forth below.

In the event concentrations of petroleum products' contaminants of concern increase above the levels approved in this Order, or if a subsequent discharge of petroleum or petroleum product occurs at the site, the Florida Department of Environmental Protection (Department) may require site rehabilitation to reduce concentrations of petroleum products' contaminants of concern to the levels approved in the NFAP or otherwise allowed by Chapter 62-770, F.A.C.

Legal Issues

The Department's Order shall become final unless a timely petition for an administrative proceeding (hearing) is filed under Sections 120.569 and 120.57, Florida

Statutes (F.S.), within 21 days of receipt of this Order. The procedures for petitioning for a hearing are set forth below.

Persons affected by this Order have the following options:

(A) If you choose to accept the Department's decision regarding the NFAP you do not have to do anything. This Order is final and effective as of the date on the top of the first page of this Order.

(B) If you choose to challenge the decision, you may do the following:

(1) File a request for an extension of time to file a petition for hearing with the Agency Clerk in the Office of General Counsel of the Department within 21 days of receipt of this Order; such a request should be made if you wish to meet with the Department in an attempt to informally resolve any disputes without first filing a petition for hearing; or

(2) File a petition for administrative hearing with the Agency Clerk in the Office of General Counsel of the Department within 21 days of receipt of this Order.

Please be advised that mediation of this decision pursuant to Section 120.573, F.S., is not available.

How to Request an Extension of Time to File a Petition for Administrative Hearing

For good cause shown, pursuant to Rule 62-110.106(4), F.A.C., the Department may grant a request for an extension of time to file a petition for hearing. Such a request must be filed (received) by the Agency Clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from Eckard Corporation, shall mail a copy of the request to Eckard Corporation at the time of filing. Timely filing a request for an extension of time tolls the time period within which a petition for administrative hearing must be made.

How to File a Petition for Administrative Hearing

A person whose substantial interests are affected by this Order may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Agency Clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from Eckard Corporation, shall mail a copy of the petition to Eckard Corporation at the time of filing. Failure to file a petition

within this time period shall waive the right of anyone who may request an administrative hearing under Sections 120.569 and 120.57, F.S.

Pursuant to Subsections 120.54(5)(b)4. and 120.569(2), F.S., and Rule 28-106.201, F.A.C., a petition for administrative hearing shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the name, address, and telephone number of the petitioner's representative, if any, the site owner's name and address, if different from the petitioner, the FDEP facility number, and the name and address of the facility;
(b) A statement of when and how each petitioner received notice of the Department's action or proposed action;
(c) An explanation of how each petitioner's substantial interests are or will be affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by the petitioner, or a statement that there are no disputed facts;
(e) A statement of the ultimate facts alleged, including a statement of the specific facts the petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Department's action or proposed action.

This Order is final and effective as of the date on the top of the first page of this Order. Timely filing a petition for administrative hearing postpones the date this Order takes effect until the Department issues either a final order pursuant to an administrative hearing or an Order Responding to Supplemental Information provided to the Department pursuant to meetings with the Department.

Judicial Review

Any party to this Order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the Agency Clerk in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within 30 days after this Order is filed with the clerk of the Department (see below).

Questions

Any questions regarding the Department's review of your NFAP should be directed to Michael J. Bland at (850) 245-8912. Questions regarding legal issues should be referred to the Department's Office of General Counsel at (850) 245-2242. Contact with any of the above does not constitute a petition for administrative hearing or request for an extension of time to file a petition for administrative hearing.

The FDEP Facility Number for this site is 418510778. Please use this identification on all future correspondence with the Department.

Sincerely,

Michael E. Ashey, Chief
Bureau of Petroleum Storage Systems

MEA/mjb

cc: Lisa Ricci, FDEP Southwest District Office
Mark Richter, Andreyev Engineering, Inc., 3740 54th Avenue North, St. Petersburg, Florida 33714

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Michelle Bla
Clerk
(or Deputy Clerk)

5/28/04
Date

P.G. CERTIFICATION

No Further Action Proposal for the Former McNitt Chevron facility located at 520 1st Street West, Bradenton, Manatee County, FDEP Facility ID#418510778.

I hereby certify that in my professional judgment, the components of this No Further Action Proposal satisfy the requirements set forth in Chapter 62-770, Florida Administrative Code (F.A.C.), and that the conclusions in this report provide reasonable assurances that the objectives stated in Chapter 62-770, F.A.C., have been met.

X I personally completed this review.

___ This review was conducted by xxxxxx, working under my direct supervision.

MICHAEL J. BLAND LICENSE NO. 1326 STATE OF FLORIDA PROFESSIONAL GEOLOGIST

Michael J. Bland, P.G.
Professional Geologist Administrator
Petroleum Cleanup Section 4

5/25/01
Date

Site No. 43

302 Manatee Avenue / Beverly Enterprises

Florida Department of Environmental Protection

Memorandum

JE 6/16

TO: Jim Crane, Bureau of Waste Cleanup
Twin Towers, Mail Station #4535

THROUGH: William Kutash, Administrator
Division of Waste Management

BUREAU OF WASTE CLEANUP
JUN 16 2003
TECHNICAL REVIEW SECTION

FROM: Gitanjali Senapati, ES II
Waste Cleanup Section

DATE: June 12, 2003

SUBJECT: Re-Sampling of Soil & Groundwater in Elevator Shaft Room
Manatee Health and Rehabilitation Center
~~302~~ Manatee Avenue East
Bradenton, Manatee County

For your information only. This document will be reviewed within the southwest district.

~~Additional Information~~:

Facility Alias: _____

District Contact: _____

This document is submitted as a result of:

Executed CO _____ Permit _____
Executed NOV _____ Civil Case _____

Other: _____

Mark S.

Thank you.

gs

Attachment:

dftr 030612

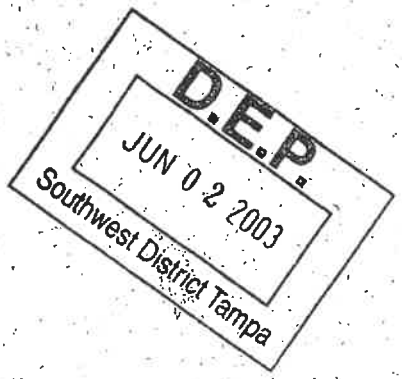


Environmental Assessments + Consulting, Inc.

Sarasota • St. Petersburg • Ft. Lauderdale

RE-SAMPLING OF SOIL & GROUNDWATER
IN ELEVATOR SHAFT ROOM
conducted on

Manatee Health and Rehabilitation Center
302 Manatee Avenue East
Bradenton
Manatee County, Florida



EAC® is a registered service mark of Environmental Assessments + Consulting, Inc.

May 28, 2003
EAC Project No.: 03-4050

D.E.P.
JUN 02 2003
Southwest District Tampa

DSB, Inc.
Mr. David Band
240 South Pineapple Avenue
Sarasota, Florida 34236

RE: RE-SAMPLING OF SOIL & GROUNDWATER IN ELEVATOR SHAFT ROOM - Manatee Health and Rehabilitation Center *(Elevator Shaft Room)* - 302 Manatee Avenue East - Bradenton- Manatee County - Florida

Dear Mr. Band:

Environmental Assessments + Consulting, Inc. (EAC) has completed a re-sampling event in the area of the western elevator shaft room at the above captioned facility located in Bradenton, Florida. All work was performed in accordance with our proposal dated April 29, 2003. As required in the Florida Department of Environmental Protection (FDEP) Response Letter dated April 1, 2003, EAC is submitting this supplemental assessment for the above captioned site. In the above correspondence letter, additional assessment activities were requested by the Department. The comments are listed below followed by the corrective action taken by EAC in this supplemental assessment. **The original correspondence letter is included as Appendix I of this report.**

COMMENT # 1
At soil sample location S-1, TRPH was detected at a concentration of 32,000 mg/kg, exceeding the Risk-Based Guidance concentration of 340 mg/kg.

RESPONSE TO COMMENT # 1
Correct, as indicated in the previous report.

COMMENT # 2
If possible, removal of contaminated soil is recommended. It is understood that this might involved manual labor within a confined space, and so the services of a certified Industrial Hygienist should be employed to ensure worker safety in compliance with OSHA regulations.

RESPONSE TO COMMENT # 2
Due to the in-place, subsurface elevator system (piping, hydraulic components, etc.), as well the presence of densely packed, hardened steel "re-bar" within the concrete flooring, the removal of the very limited quantity of impacted soil is not practical nor feasible. Please see below comments.

Industry Leaders in Environmental and Asbestos Consulting Services

COMMENT # 3

The report states that "Prior to inserting the well into the borehole, a fabric meshed "sock" was placed over the entire slotted interval of the PVC well to provide a filtration mechanism for the groundwater and to restrict any sediment from entering the well". The usage of a "sock" to filter groundwater entering the well prior to sampling may have filtered out detectable petroleum hydrocarbons due to absorption to the fabric material. It is recommended that, in compliance with Ch. 62-520.300 (9) F.A.C., that another groundwater sample be taken at the TMW -1 location using a well point that does not have a fabric filter device. The department recommends the collection of a soil sample from the area of TMW-1 for TRPH speciation. From this, the potential leachability of the TRPH speciation can be determined and appropriate remedial measures can be determined.

RESPONSE TO COMMENT # 3

One (1) temporary monitor well (TMW-1b) was installed on May 15, 2003 within the elevator shaft room. TMW-1b was installed immediately adjacent to the previous TMW-1.

Prior to installing the temporary monitor well, a hand auger was advanced at this location. The bore hole for TMW-1b was advanced utilizing a 4-inch decontaminated, stainless-steel, hand auger. A two-inch diameter, schedule 40 PVC, monitor well was then installed by inserting the machine-slotted, 0.010-inch, PVC well screen into the hand auger boring to the bottom of the bore hole (approximately 8-feet BLS). **As instructed by the FDEP, during the well installation, a fabric-meshed "sock" was not placed over the slotted interval of the PVC well.** The annular space of the well was then back-filled with the natural sands to land surface. The PVC casing was connected to the screen section using threaded flush-mounted joints. The location of TMW-1b is represented in **Appendix III**. Groundwater purging and sampling conducted by EAC was performed in accordance DEP-SOP-001/01 (FS 2200 Groundwater Sampling). On May 15, 2003, groundwater samples were collected from TMW-1b. Laboratory analytical results from TMW-1b for TRPH indicate the absence of petroleum hydrocarbons.

On May 15, 2003, EAC representatives also collected a soil sample for TRPH Speciation laboratory analysis, as required in the above FDEP Response Letter. Specifically, one (1) soil sample (S-1b) was collected from within the elevator shaft (S-1b was collected directly beneath the concrete floor adjacent to the previous S-1). Laboratory analytical results from S-1b for TRPH (speciation) indicate the absence of petroleum hydrocarbons (Aliphatics or Aromatics). The laboratory analytical results are attached as **Appendix II**.

Conclusions / Recommendations

Based on field investigations conducted on the site and the laboratory results contained here-in, petroleum impacts previously identified in the surficial soils directly beneath the western elevator shaft room do not appear to be impacting the groundwater in this area. Based on the groundwater analytical results from two (2) sampling events, groundwater in this area has not been impacted. Furthermore, additional soil sampling in the elevator shaft room indicates that only a very limited area of soil directly underneath the concrete slab (extreme southwest corner of elevator room) have been impacted with hydraulic oil. Based upon visual observations of the soils in this area during this supplemental assessment, the area of impacted soil is approximately 2' X 2'. Additionally, laboratory analytical results from S-1b (collected immediately beside S-1) for TRPH (speciation) indicate the absence of petroleum hydrocarbons (Aliphatics or Aromatics).

Based upon the above, EAC feels that the soil in this area is not producing leachate and is not causing groundwater contamination. At this time EAC recommends that additional assessment work not be conducted on the subject property and that the FDEP issue site closure for the subject property.

Should you have any questions regarding this report, please feel free to call us at (941) 378-8844.

Respectfully submitted,
Environmental Assessments + Consulting, Inc.

John P. Bradshaw, P.G., REPA, CFEA
President/Principal
Licensed Florida Professional Geologist #1906

RECEIVED
FEB 06 2003
D.E.P.
SOUTHWEST DISTRICT

PHASE II ENVIRONMENTAL SITE ASSESSMENT
Conducted at:

Manatee Health and Rehabilitation Center
(Elevator Shaft Room)
302 Manatee Avenue East
Bradenton
Manatee County, Florida

PHASE II
ENVIRONMENTAL SITE ASSESSMENT

Conducted at:

Manatee Health and Rehabilitation Center
(Western Elevator Shaft Room)
302 Manatee Avenue East
Bradenton
Manatee County, Florida

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
FEB 06 2003
SOUTHWEST DISTRICT
TAMPA

February 4, 2003

Prepared for and Certified to:

DSB, Inc.
Sarasota, Florida

EAC Project Number: 02-3047

Prepared by:

EAC
1882 Porter Lake Drive #105
Sarasota, Florida 34240

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APPENDIX III - LABORATORY ANALYTICAL RESULTS / CHAIN-OF-CUSTODY FORMS

APPENDIX IV - FDEP LETTER DATED SEPTEMBER 3, 2002

1.0 GENERAL INFORMATION / SCOPE OF WORK

EAC was contracted to perform a Phase II Environmental Site Assessment at the western elevator shaft room at the Manatee Health and Rehabilitation Center located at 302 Manatee Avenue East, in Bradenton, Manatee County, Florida on behalf of DSB, Inc.

This Phase II Assessment was conducted in order to determine if petroleum products (specifically hydraulic fluid) have affected the environmental condition of the soil or groundwater beneath the western elevator on the subject site. The purpose of the Phase II ESA is to address the environmental concerns on the subject property identified within a letter from the Florida Department of Environmental Protection (FDEP), dated September 3, 2002. The letter indicated that in July of 2002 a report was made to the FDEP Bureau of Emergency Response that there had been a hydraulic leak within the western on-site elevator. This report claimed that approximately 5 to 10 gallons of hydraulic fluid was leaking from this system per week and that the leak had been ongoing for a significant amount of time.

All field work was conducted on January 23, 2003 by Chris J. Fraser. Mr. Fraser holds a Bachelor of Arts degree in Environmental Geography from Colgate University. In addition, he is also a Registered Environmental Property Assessor (REPA Reg. No. 6119) with the National Registry of Environmental Professionals (NREP) and a Certified Florida Environmental Assessor (CFEA No. 275) with the Florida Environmental Assessors Association (FEAA).

2.0 GENERAL SITE DESCRIPTION & LOCATION

The subject property is located in a commercial and residential area in Section 26, Township 34 South, Range 17 East in Manatee County, Florida. The site elevation is approximately 10-feet above mean-sea-level. The subject property, approximately 1.46 acres in size, is currently developed with a 3-story brick structure that is 45,315 square feet in size (Former Manatee Health and Rehabilitation Center). The remainder of the site consists of paved parking and landscaped areas. The area of environmental concern with regard to this Phase II ESA is in the southwestern portion of the subject property. Located within the southwestern portion of the on-site structure there is an elevator that was installed on the subject property in the early 1970's. At the time of the site inspection, the elevator system and the floor within the elevator vault were inspected for any indications of leakage. At the time of the site inspection, the floor within the elevator vault was stained with hydraulic fluid, although significant pooling was not observed. See **Appendix I** for the Site Plan showing the features of the subject property and a Temporary Monitor Well / Soil Sample Location Map.

3.0 GEOLOGIC DESCRIPTION

3.1 Local Geology & Soil Description

The U.S.D.A. Soil Conservation Service (SCS) Soil Survey for Manatee County, Florida (1983) identifies the soils in the area of the subject property as EauGallie fine sand. The survey describes EauGallie fine sand as a nearly level, poorly drained soil in broad areas of flatwoods. Slopes are smooth and range from 0 to 2 percent.

The surface layer of EauGallie fine sand is typically 5 inches of very dark gray fine sand. The subsurface layer is approximately 23 inches thick and consists of grayish brown and light brownish gray fine sand. The subsoil consists of 14 inches of black fine sand that is coated with organic matter over 8 inches of grayish brown sandy clay loam. The substratum, to an approximate depth of 65 inches, is grayish brown fine sand, loamy fine sand, and fine sandy loam.

As part of the Phase II Investigation, limited site specific geology was also defined by conducting three (3) soil borings on the subject property. Based on field data, the soils beneath the subject property consist of brown / gray fine sand from land surface to an approximate depth of 1-foot below land surface (BLS), brown fine sand from 1-foot BLS to 3-feet BLS, and dark brown fine sand from 3-feet BLS to 8-feet BLS. The water table was encountered at approximately 5-feet BLS. (1-foot below slab in elevator shaft room)

3.2 Regional Geology

Manatee County is underlain by a triple aquifer system consisting of the surficial aquifer, and intermediate aquifer, and the Floridan Aquifer. The surficial aquifer consists of Pleistocene to Recent age sand or shell sands that grade downward into the confining unit between the surficial and intermediate aquifers. This confining unit consists of Pliocene and Pleistocene clayey sands, Clay and marl. The thickness of the surficial aquifer ranges from only a few feet to over 50 feet thick. The confining unit ranges from less than 25 feet in the northern part of the county to over 100 feet in the east.

A sequence of sandy clay, clay and marl underlie the surficial aquifer and form the confining layer between the surficial and intermediate aquifers. The intermediate aquifer system is comprised of on, two or three water-bearing units comprised of sand and carbonate rocks of the Miocene Hawthorn Formation and the lower portion of the Pliocene Tamiami Formation. The thickness of the intermediate aquifer in Manatee County ranges from 200 feet in the northwest to 400 feet in the southeast corner of the county.

The confining unit between the intermediate and Floridan aquifer is comprised on sandy clay and clayey sand of the lower Hawthorn formation. In portions of Manatee County, the underlying upper Tampa Formation may be hydraulically connected with the Hawthorn formation and is therefore included as part of the intermediate aquifer. In these areas, a confining unit separates the carbonate units of the Tampa Formation from the underlying Floridan aquifer carbonates. The principle potable aquifer in the region is the upper Floridan aquifer, which underlies the intermediate aquifer.

Currently, the surficial aquifer in Manatee County is undeveloped as a source of drinking water. However, small volumes are used for rural domestic and livestock supply, lawn irrigation, and for heating and air conditioning.

The upper Floridan Aquifer is the most productive aquifer in Manatee County and is composed of a thick sequence of limestone and dolomite. Most groundwater produced from the Floridan Aquifer is used for municipal supplies. Agricultural and industrial uses are minor.

4.0 METHODOLOGY

4.1 Elevator Inspection

Prior to the advancement of the soil borings and the installation of the temporary groundwater monitoring well, the integrity of the elevator system was determined by an outside contractor. On January 23, 2003, Mr. Craig Rieth, Certified Elevator Inspector (Certificate #C2264) and Mr. Bob Sinram, Certified Elevator Technician with Abell Elevator International performed a tightness test of the system and an overall maintenance inspection of the elevator. At the time of the inspection it was found that the elevator tested tight and that the system was in working order. Also, it was indicated by Mr. Rieth that all hydraulically driven elevators are affixed with an overflow mechanism on the cylinder. This mechanism is comprised of an overflow port on the cylinder with a drip line leading to a catchment basin, which in this case, is a 5-gallon plastic bucket. Mr. Rieth also stated that a normal operating elevator will discharge approximately 4-5 gallons of hydraulic fluid to the overflow mechanism per month. If the volume of fluid is greater than this, it may be an indicator that the packing on the cylinder head has been compromised. Mr. Rieth stated that if the packing on the cylinder head has been compromised then the hydraulic fluid within the system would leak onto the cylinder and discharge into the overflow mechanism.

4.2 Soil Sampling and OVA Screening

The areas chosen for the soil borings / soil samples and OVA soil screening were selected based on information obtained and visual observations made at the subject property. Specifically, two (2) soil samples were collected for laboratory analysis from within the elevator shaft (S-1 and S-2 were collected directly beneath the concrete floor) and two (2) soil samples were collected for laboratory analysis from a soil boring advanced in the suspected down gradient direction of the on-site elevator (S-3 @ 3-feet BLS and S-4 @ 4.5-feet BLS). In addition, soil samples for OVA/FID analysis were collected from each of the above soil borings (SB-1 through SB-3).

Soil samples were obtained by advancing a 4-inch, stainless-steel, hand auger into the soil to a maximum depth of 5-feet, and then withdrawing the auger to enable classification and sampling of the soil. Soils samples were collected at intervals of two (2) feet starting at land surface down

to an approximate depth of 5-feet BLS. The water table was encountered at approximately 5-feet BLS.

"Excessively contaminated soils" are defined in Chapter 62-770, Florida Administrative Code, as soils that are saturated with petroleum or petroleum product, or those that cause a total corrected hydrocarbon reading of 50 ppm or higher for the Kerosene Analytical Group on an Organic Vapor Analyzer (OVA) instrument equipped with a Flame-Ionization Detector (FID) upon sampling the headspace in a half-filled 16-ounce soil jar. A Sensidyne Organic Vapor Analyzer (OVA) was utilized for the headspace analyses. The OVA was equipped with a charcoal filter, which was intended to allow discrimination between petroleum hydrocarbons and naturally occurring methane in the soil vapor. With the filter removed, the OVA measured the sum of all hydrocarbons in the soil vapor. With the filter in place, only methane was measured. The level of suspected petroleum hydrocarbons in the soil vapor for each sample was obtained by subtracting the filtered reading from the unfiltered reading. Upon retrieval, soil samples were also examined for physical and olfactory signs of degradation by petroleum products.

In addition, Chapter 62-770, Florida Administrative Code defines "contaminated soil" as soil that is contaminated with petroleum or petroleum products or their chemical constituents to the extent that Chapter 62-777, Florida Administrative Code, Soil Cleanup Target Levels (SCTLs) are exceeded. The locations of the soil borings and temporary monitor wells are presented in **Appendix I**. The OVA readings and monitor well construction details are summarized in **Appendix II**.

4.3 Chemical Analyses - Soil

Soil samples (S-1 through S-4) collected from SB-1, SB-2 and SB-3 were analyzed in the laboratory for Total Recoverable Petroleum Hydrocarbons (TPH), detectable by the Florida Pro Method, as stipulated in the FDEP letter dated September 3, 2002 **(See Appendix IV)**. Copies of the chain of custody forms the analytical report from US Biosystems are included as **Appendix III**.

4.4 Temporary Monitor Well Installation

Two (2) temporary monitor wells (TMW-1 and TMW-2) were installed on January 23, 2003 in different suspected areas of potential groundwater contamination. TMW-1 was installed within the elevator shaft; and TMW-2 was installed immediately outside of the on-site structure in the down gradient direction. Prior to installing the temporary monitor wells, a hand auger was advanced at these locations. The bore holes for TMW-1 and TMW-2 were advanced utilizing a 4-inch, stainless-steel, hand auger. A two-inch diameter, schedule 40 PVC, monitor well was then installed by inserting the machine-slotted, 0.010-inch, PVC well screen into the hand auger boring to the bottom of the bore hole (approximately 8-feet BLS). Prior to inserting the well into the borehole, a fabric-meshed "sock" was placed over the entire slotted interval of the PVC well to provide a filtration mechanism for the groundwater and to restrict any sediment from entering the well. The annular space of the well was then back-filled with the natural sands to land surface. The PVC casing was connected to the screen section using threaded flush-mounted joints. The locations of temporary monitor wells TMW-1 and TMW-2 are represented in **Appendix I.**

4.5 Groundwater Sampling

Groundwater purging and sampling conducted by EAC was performed in accordance DEP-SOP-001/01 (FS 2200 Groundwater Sampling). On January 23, 2003, groundwater samples were collected from temporary monitor wells TMW-1 and TMW-2. The locations of the temporary monitor wells can be found in **Appendix I.**

Groundwater purging was accomplished utilizing a portable low flow Masterflex L/S Peristaltic Pump and a dedicated section of Teflon-lined tubing through the pump head and polyethylene tubing set to the middle of the water column. Groundwater samples collected to be analyzed for Total Petroleum Hydrocarbons (TPH) were collected using the pump and vacuum trap method.

Upon sample collection, the groundwater samples were capped, labeled, packed on ice, and transported to US Biosystems in Boca Raton, Florida, Florida for analysis. The groundwater sample kits were provided to EAC by US Biosystems.

4.6 Chemical Analyses - Groundwater

Groundwater samples collected from TMW-1 and TMW-2 were analyzed in the laboratory for Total Recoverable Petroleum Hydrocarbons (TPH), detectable by the Florida Pro Method. Copies of the chain of custody forms the analytical report from US Biosystems are included as **Appendix III**.

5.0 ASSESSMENT RESULTS

5.1 OVA Results

As indicated, net OVA readings ranged from 0 ppm to 150 ppm @ SB-1 (3-5 foot interval). SB-1 was located within the elevator shaft room (west side). In addition, the soils collected for OVA analysis at SB-1 exhibited a distinct petroleum odor (hydraulic oil). As indicated by the OVA analysis results, "excessively contaminated soil" was encountered during this Phase II Assessment in location at SB-1.

5.2 Laboratory Analytical Results - Soil

Laboratory analytical results indicate the following: At S-2, S-3 and S-4, Total Recoverable Petroleum Hydrocarbons (TPH), detectable by the Florida Pro Method, were not detected at or above laboratory detection limits. At S-1, TPH was detected at a concentration of 32,000 milligrams per kilogram (mg/Kg) which is in accedence of its established Soil Cleanup Target Level (SCTL) of 340mg/Kg as stipulated in Florida Administrative Code (FAC) Chapter 62-777.

5.3 Laboratory Analytical Results - Groundwater

Laboratory analytical results indicate the following: At TMW-1 and TMW-2, Total Recoverable Petroleum Hydrocarbons (TPH), detectable by the Florida Pro Method, were not detected at or above laboratory detection limits.

6.0 CONCLUSIONS AND RECOMMENDATIONS

The results of our field investigation and laboratory analyses indicate that Total Recoverable Petroleum Hydrocarbons (TPH), detectable by the Florida Pro Method were present in accedence of the FDEP established Soil Cleanup Target Level at S-1 (next to elevator shaft). At the other soil sample locations (S-2, S-3 and S-4) and at the groundwater sample locations (TMW-1 and TMW-2), TPH was not detected above the laboratory detection limits.

Based on the analytical results contained herein, it appears that the extent of the soil contamination is restricted to a very small area in the western portion of the elevator shaft. As indicated by the groundwater analytical results, groundwater conditions have not been adversely affected in the area of the elevator shaft or in a downgradient direction. At this time, due to the inaccessible location of affected soils (beneath the elevator shaft) and the relatively small area of soil contamination which exists. In addition, as indicated by the elevator assessment and inspection performed by Abell Elevator Company, the hydraulic system of the elevator appears to be tight as no pressure lost was discovered.

Due to the lack of groundwater contamination in this area, EAC recommends that no additional assessment work be conducted on the subject property.

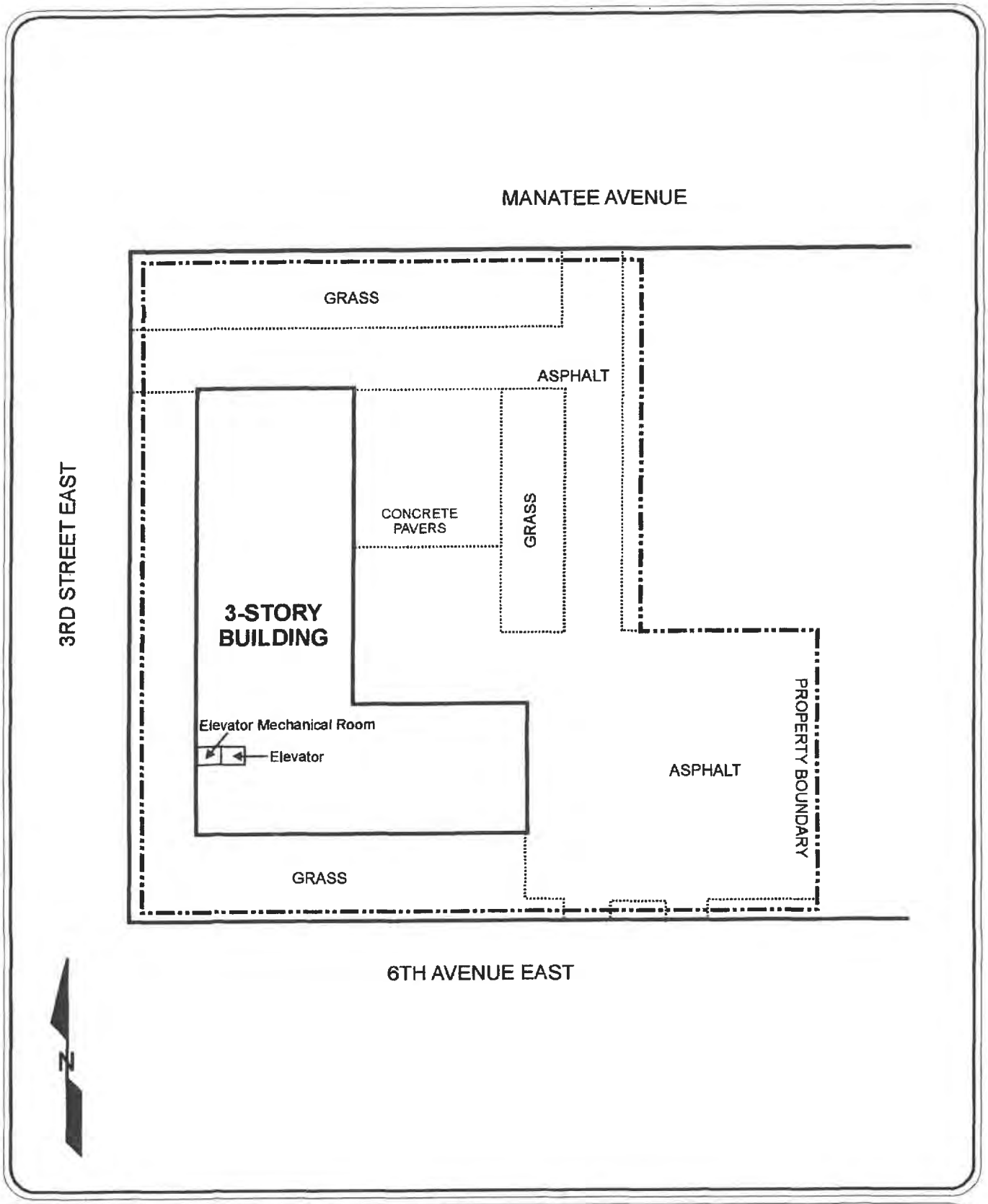
7.0 LIMITATIONS / DEFINITIONS

The scope of work for this assessment was limited to performing tasks as defined in the PSA agreement between **EAC** and **DSB, Inc.** dated January 14, 2003. The use of this report by a third party does so at their own risk.

This report has presented and discussed the environmental condition of the subject property up to the date of our field investigation only, and does not warrant that the property will remain in that condition past that date. Conclusions drawn from the results of this assessment are limited by the methods used and do not represent a warranty that all areas within the subject property are in the same condition. This environmental assessment is also compatible with standard geological practices as required by Federal and State law. The analysis and recommendations submitted in this report are based upon the data obtained from four (4) soil sample locations and two (2) groundwater sample locations as indicated in **Appendix I.** This report does not reflect any variations which may occur between the sampling points.

The client should realize that the subject property, which in our opinion, did not exhibit evidence that toxic or hazardous wastes were at the ground surface during our site inspection and field work, except as qualified herein, could later be impacted due to natural phenomena, human intervention, on-site pollution sources or contamination due to adjacent properties. These occurrences are beyond our control. Any site plans or drawings show approximate dimensions and are included in this report to assist the client in visualizing the site and the surroundings, and not to give a necessarily accurate dimensional representation of the site; no boundary survey was conducted on the subject property. EAC or its representative has made no agreement to give legal testimony nor to appear in court or other hearings, formal or informal, as part of the PSA with the client or any party involved with the property. The client may make separate arrangements with EAC for testimony required now or in the future. All portions of this report are an integral part of this Phase II ESA and should not be separated from any other portion of the report. This report is the property of Environmental Assessments +Consulting, Inc. The use of this report by unauthorized third parties is at their own risk.

APPENDIX I
GENERAL SITE PLAN AND SOIL BORING / SOIL SAMPLE / TEMPORARY MONITOR WELL LOCATION MAPS

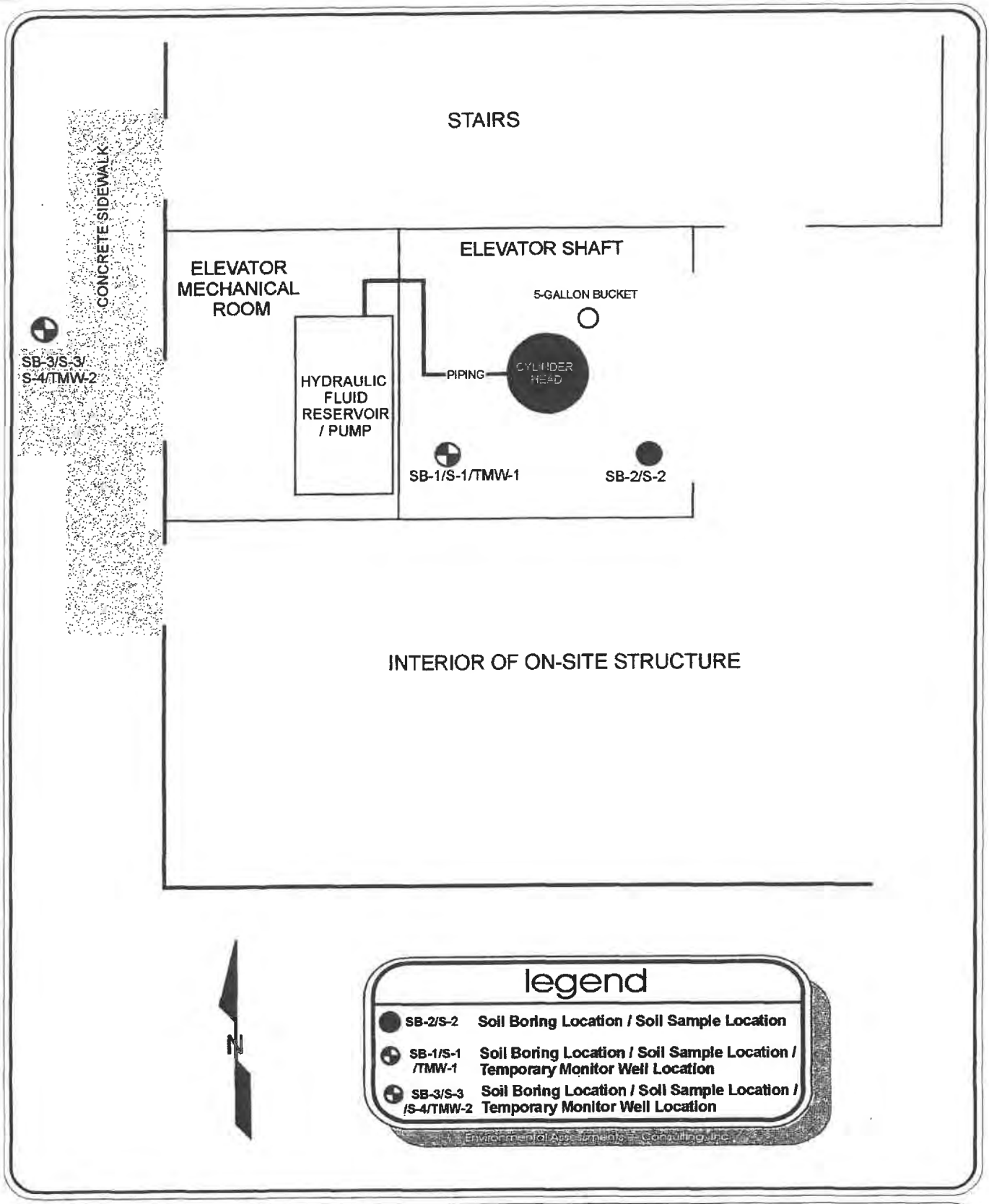


Project No.: 02-3047

Scale: N.T.S.

GENERAL SITE PLAN

Manatee Health & Rehabilitation Center
302 East Manatee Avenue
Bradenton, Florida



Project No.: 02-3047

Scale:
N.T.S.

SOIL BORING / SOIL SAMPLE / TEMPORARY MONITOR WELL LOCATION MAP

Manatee Health & Rehabilitation Center
302 East Manatee Avenue
Bradenton, Florida

Site No. 45

Bradenton Herald

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/25/2026 Last Data Refresh: 03/24/2026 Report Generated from DOPPLER

District	Southwest	**Type**	Fuel user/Non-retail
County	Manatee	**Status**	CLOSED
ID	8630014	**Latitude**	27° 29' 48.6685
Name	BRADENTON HERALD 102 MANATEE AVE W BRADENTON, FL 34205-8810	**Longitude**	82° 33' 52.0039
		LL Method	DPHO
Contact	BOB TURNER EXT 7300	**LL Status**	REVIEWED
Phone	(941) 748-0411	**Status Date**	05/09/2011

Account Owner Information

Name	THE HERALD 102 MANATEE AVE W BRADENTON, FL 34205-8810	**Effective Date**	07/25/2006
Contact	BOB TURNER		
Phone	(813) 748-0411		
Email		**Placard # / Date**	404191 - 06/12/2013

No Property Owner Information Found

Tank	Tank Size	Content	Installed	Placement	Status
1	4000	Unleaded Gas (B)	06/01/1984	UNDERGROUND	Removed from Site (B)

Constructions
(E) Fiberglass

Pipings
(D) External protective coating

Monitorings
(8) Manually sampled wells

Tank	Tank Size	Content	Installed	Placement	Status

2	1000	Unleaded Gas (B)	06/01/2006	ABOVEGROUND	Removed from Site (B)

Constructions
(C) Steel
(I) Double wall
(M) Spill containment bucket
(Q) DEP approved protection

Pipings
(A) Abv, no soil contact
(I) Suction piping system

Monitorings
(F) Monitor dbl wall tank space
(Q) Visual inspection of ASTs

Insurance Documents

FR Type	Effective Date	Expiration Date	Company Name
INSURANCE	03/10/2013	03/10/2014	ILLINOIS UNION
INSURANCE	03/10/2012	03/10/2013	ILLINOIS UNION
INSURANCE	03/10/2012	03/10/2013	ILLINOIS UNION
INSURANCE	03/10/2011	03/10/2012	ACE
INSURANCE	05/22/2010	05/22/2011	ZURICH-AMERICAN
INSURANCE	05/22/2010	05/22/2011	ZURICH-AMERICAN
INSURANCE	05/22/2009	05/22/2010	ZURICH-AMERICAN
INSURANCE	05/22/2009	05/22/2010	ZURICH-AMERICAN
INSURANCE	05/22/2008	05/22/2009	ZURICH-AMERICAN
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2007	05/01/2008	

No System Tests Found

No Legacy Data Found

Compliance Activity Information

Activity Code	Date Completed	Results	Inspector	AST/UST Count	Description
Site Inspection	05/21/2014	Minor Out of Compliance	TRETHEWEY_MB_1	1/0	Closure
Letter	05/21/2014	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Record Document	04/02/2013	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	03/25/2013	Minor Out of Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Letter	03/25/2013	Satisfied	TRETHEWEY_MB_1		Non-Compliance

Record Document	04/03/2012	Satisfied	MASON_RS_1		Non-Compliance
Record Document	03/13/2012	Satisfied	MASON_RS_1		Non-Compliance
Letter	03/09/2012	Satisfied	MASON_RS_1		Non-Compliance
Site Inspection	03/09/2012	Minor Out of Compliance	MASON_RS_1	1/0	Routine Compliance
Site Inspection	04/15/2011	In Compliance	MASON_RS_1	1/0	Routine Compliance
Record Document	07/07/2010	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Record Document	05/28/2010	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Letter	04/28/2010	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	04/28/2010	Major Out of Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Site Inspection	06/25/2009	In Compliance	TRETHEWEY_MB_1	1/0	Non-Compliance
Letter	04/10/2009	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	04/10/2009	Minor Out of Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Record Document	01/07/2009	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Letter	05/02/2008	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	05/02/2008	Minor Out of Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Site Inspection	06/12/2007	In Compliance	REEDER_JH_1	1/0	Installation

No Open AOCs Found

No Open Violations Found

Discharge Information

Discharge Date	Clean Up Status	Score	Eligibility Info	Site Manager	Phone
05/13/1997	COMPLETED				

RECEIVED
SEP 0 5 1997
Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

LIMITED CONTAMINATION ASSESSMENT REPORT

of

BRADENTON HERALD PROPERTY
102 Manatee Avenue West
Bradenton, Florida
FDEP Facility ID #418630014

BUREAU OF PETROLEUM
STORAGE SYSTEMS
SEP 11 1997
PETROLEUM CLEANUP
SECTION 4

RECEIVED
DEPARTMENT OF
ENVIRONMENTAL PROTECTION
97 SEP 11 AM 10:09
BUREAU OF PETROLEUM
STORAGE SYSTEMS
DOCUMENT MANAGEMENT
CENTER

LIMITED CONTAMINATION ASSESSMENT REPORT

of

BRADENTON HERALD PROPERTY
102 Manatee Avenue West
Bradenton, Florida
FDEP Facility ID #418630014

EAC Project Number 97-1561

Conducted by:
Environmental Assessments + Consulting, Inc.
Sarasota, Florida

Conducted for:
The Bradenton Herald
Bradenton, Florida



John H. Bradshaw, P.G. (Reg. No. 1906)
Senior Environmental Geologist
President, Environmental Assessments + Consulting, Inc.

September, 1997

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FIGURES

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Figure 6	Well Inventory Map

APPENDICES

Appendix 1	Tank Closure Report, May 7, 1997
Appendix 2	Monitor Well Lithologic Logs
Appendix 3	Groundwater Sampling Analytical Results/Laboratory Reports
Appendix 4	Groundwater Elevation Data
Appendix 5	Monitor Well Construction Details

BRADENTON HERALD PROPERTY
102 MANATEE AVENUE WEST
BRADENTON, FLORIDA
(FDEP FACILITY ID. #418630014)

1.0 INTRODUCTION

Environmental Assessments + Consulting, Inc. (EAC) was retained by The Bradenton Herald to perform a Limited Contamination Assessment (CA), in accordance with Florida Administrative Code (FAC) Chapter 62-770 (Petroleum Contamination Site Cleanup Criteria), at the Bradenton Herald property located at 102 Manatee Avenue West in Bradenton, Florida. The subject site is currently occupied by The Bradenton Herald. The FDEP Facility ID number for this site is 418630014.

1.1 Background

One (1) 4000-gallon petroleum product (gasoline) UST was removed from the subject site on April 21, 1997 by Jack H. Eubank, Inc. Subsequently, a Tank Closure Assessment Report dated May 7, 1997 was generated by Environmental Safety Consultants, Inc. (ESC). A summary of the closure assessments activities are as follows:

Fourteen soil samples were collected around the perimeter and bottom of the tank vault for headspace testing; soil headspace vapors were analyzed with an OVA/FID in accordance with the method defined in FAC Chapter 62-770, sampling the headspace of a 16 ounce soil jar. The results obtained with the OVA/FID indicated that soils in the former tank excavation area were not "excessively contaminated" by petroleum products as defined in FAC Chapter 62-770. In addition, one groundwater sample was collected from a temporary well located in the tank vault area. Laboratory analysis indicated that Benzene was detected at a concentration of 0.42 ug/L, Toluene was detected at a level of 3.1 ug/L, Ethylbenzene was detected at a concentration of 2.0 ug/L and total Xylenes were detected at a concentration of 88.2 ug/L (TVOA = 93.72 ug/L). These concentrations exceeded the state clean-up criteria (50 ug/L for TVOA) as established in

FAC Chapter 62-770 for the Gasoline Analytical Group. A copy of the ESC Tank Closure Assessment Report is included as **Appendix 1**. A Discharge Reporting Form (FDEP 62-761.900 (1)) was filed on May 13, 1997 and a Contamination Assessment (CA) was then initiated by Environmental Assessments + Consulting, Inc. (EAC) pursuant to FAC 62-770.600 (1).

1.2 Scope of Work

The following Limited Contamination Assessment tasks have been completed at the subject site in accordance with FAC Chapter 62-770:

- Determination of the existence of domestic and/or public supply wells in the vicinity of the site;
- Installation of three (3) permanent monitoring wells;
- Field headspace analyses of soil samples collected from the monitoring well borings;
- Installation of three (3) Piezometers and determination of the local groundwater flow direction;
- Laboratory analysis of groundwater samples collected from the source well (MW-2), upgradient well (MW-1), and downgradient well (MW-3) by EPA methods 602 on August 27, 1997.
- All assessment tasks were performed adhering to EAC's approved Comprehensive Quality Assurance Project Plan (Comp QAPP) #930135-G on file with the FDEP.

1.3 Location and Topography

The site is located in the NE 1/4 of the NE 1/4 of Section 26, Township 35 South, Range 17 East, in Bradenton, Manatee County, Florida. The surrounding area is characterized by commercial and light industrial properties. Topographical relief in the immediate area is low with the surface elevation on the subject property being at approximately ten (10) feet above sea level. The site lies approximately 1/4-mile south of the Manatee River, which his contiguous with the Gulf of Mexico. The water table is generally encountered between 4.0 feet to 6.0 feet below grade.

2.0 SOIL ASSESSMENT ACTIVITIES

2.1 Monitoring Well Borings

Three (3) borings for groundwater monitoring wells were advanced in the immediate vicinity of the former UST area (upgradient, downgradient and source) using a stainless steel, decontaminated hand auger. The locations of the borings for monitoring wells MW-1, MW-2, and MW-3 are shown in **Figure 2, Site Plan.**

Soil samples were collected from the monitoring well borings at MW-1, MW-2 and MW-3 at two (2) and four (4) foot intervals to a total depth of approximately 4-feet below grade (vadose zone) and subjected to headspace analyses as prescribed in FAC Chapter 62-770. The water table was encountered at approximately 4.0 feet below grade.

2.1.1 Headspace Analyses

FAC Chapter 62-770 defines "excessively contaminated" soils as those that are saturated with petroleum or petroleum product, or those that cause a total hydrocarbon reading of 500 ppm for Gasoline Analytical Group or 50 ppm for Kerosene Analytical Group on an Organic Vapor Analyzer (OVA) instrument equipped with a Flame Ionization Detector (FID) upon sampling the headspace in a half-filled sixteen (16) ounce soil jar. The former contents of the UST (gasoline) dictated that the Gasoline Analytical Group criteria (500 ppm) be applied to the subject site.

A Sensidyne 41085 model Organic Vapor Analyzer (OVA) was utilized for the headspace analyses. The OVA was equipped with a charcoal filter, which was intended to allow discrimination between petroleum hydrocarbons and naturally occurring methane in the soil vapor. With the filter removed, the OVA measured the sum of all hydrocarbons in the soil vapor. With the filter in place, only methane was measured. The level of suspected petroleum hydrocarbons in the soil vapor for each sample was obtained by subtracting the filtered reading from the unfiltered reading.

During augering activities, net OVA readings were below detection limits of the OVA-FID at monitor well MW-3 (downgradient well). In addition, at MW-1 (upgradient well), net OVA readings ranged from Below Detection Limits (BDL) to 2 ppm and at MW-2 (source well), total OVA readings ranged from 160 to 370 ppm. As indicated, "excessively contaminated" soil, as defined by FAC Chapter 62-770, was not identified at any of the monitor well locations. The results of the headspace analyses are summarized in **Appendix 2.**

OVA/FID soil screening activities in order to define any existing "excessively contaminated" soil were not performed in the area of the former UST because no excessively impacted soil was encountered during the Tank Closure activities completed in May, 1997.

3.0 GROUNDWATER ASSESSMENT ACTIVITIES

3.1 Monitoring Well Installation

Three (3) groundwater monitoring wells, designated MW-1, MW-2 and MW-3 were installed at the subject site on August 21, 1997. The locations of these wells are shown in **Figure 2, Site Plan.**

Monitor wells MW-1, MW-2 and MW-3 were installed by hand auger at the subject site. MW-1 was designated as the upgradient monitor well, MW-2 was designated as the source monitor well and MW-3 was designated as the downgradient monitor well. The bore holes for the monitor wells were advanced utilizing a 4" stainless steel, decontaminated hand auger. Two (2) inch Schedule 40 PVC casing and screen was set to approximately 7.0 feet below grade, the total depth of the wells. Screened intervals (0.010" slot size) extended from the well bottoms to approximately two (2) foot below grade. The annulus of each well was filled with clean 20/30 silica sand to a depth of 1.0 feet above the screened interval. A six (6) inch thick layer of bentonite was then placed above the sand and hydrated. The remaining annular volume was then filled with neat Portland cement grout and completed with a locking cap. Lithologic Logs and Well Construction Details for monitor wells MW-1, MW-2 and MW-3 are presented in **Appendices 2 and 5,** respectively.

3.2 Groundwater Sampling Protocol

On August 27, 1997, groundwater samples were collected from Monitoring Wells MW-1, MW-2 and MW-3 in accordance with EAC's approved Comprehensive Generic QAPP #930135G on file with the Florida Department of Environmental Protection. The depth to the water table was measured in each well to determine the amount of groundwater to be evacuated prior to collecting the samples. Groundwater samples were collected using pre-cleaned, dedicated, teflon bailers at the monitoring well locations. Decontamination procedures in the field were as follows: The teflon bailers were first scrubbed with a nylon brush in an Alconox/Water solution, then throughly rinsed with Deionized Water. The bailers were then sprayed with laboratory grade isopropyl alcohol and finally rinsed with laboratory grade Analyte Free water and then allowed to air dry.

Prior to collection of the samples, the well volumes of each well were calculated, then three (3) well volumes were purged from each well in order to obtain a representative groundwater sample. In addition, temperature, pH and conductivity readings were obtained and recorded after each purging interval. Sample collection was achieved by using a teflon bailor to retrieve the groundwater samples from the monitor wells; the samples were then emptied into dedicated, glass vials. All samples were then placed in an iced cooler and transported to Progress Environmental Laboratories in Tampa, Florida for analysis.

Samples collected from MW-1 (upgradient well), MW-2 (source well), and MW-3 (downgradient well) were analyzed for compounds detectable by EPA method 602 as specified in FAC Chapter 62-770.

3.3 Analytical Results

The results of the groundwater sample analyses are summarized on the following page in **Table 3.3**. The complete laboratory analytical results are presented in **Appendix 3.**

Table 3.3: Volatile Organic Concentrations at Bradenton Herald Property (8/27/97)

COMPOUND	MW-1	MW-2	MW-3	E.B.	MCL
MTBE	ND	ND	ND	ND	50
TVOA	0.56	ND	ND	ND	50
Benzene	ND	ND	ND	ND	1.0
Toluene	ND	ND	ND	ND	---
Ethylbenzene	ND	ND	ND	ND	---
Xylenes (Total)	ND	ND	ND	ND	---
Chlorobenzene	ND	ND	ND	ND	---
1,2-Dichlorobenzene	ND	ND	ND	ND	---
1,3-Dichlorobenzene	ND	ND	ND	ND	---
1,4-Dichlorobenzene	ND	ND	ND	ND	---

- All concentrations are given are in micrograms per liter (ug/L).
- ND signifies Not Detected at or above laboratory detection limits.
- MCL = Maximum Contaminant Level as Established in FAC 62-770.
- EB = Equipment Blank.

3.3.1 Discussion

FAC Chapter 62-770.730 (5) (a) 1 specifies Gasoline Analytical Group contaminant target levels for G-II groundwater as follows:

Contaminant	Concentration
Benzene	1.0 ug/L
Total VOAs (sum of Benzene, Ethyl Benzene, Toluene and Xylene)	50.0 ug/L
Methyl-Tert-Butyl-Ether (MTBE)	50.0 ug/L

During the August 27, 1997 groundwater sampling event, Toluene was found to be present in the sample collected from MW-1 (upgradient well) at a concentration of 0.56 micrograms per liter (ug/l) (TVOA = 0.56 ug/l). In addition, compounds detectable by EPA method 602 were not found to be present in any of the groundwater samples collected from MW-2 or MW-3 (source and downgradient wells).

4.0 HYDROGEOLOGIC DATA

Groundwater flow direction was also determined, and an attempt was made to identify private and public supply water wells in the vicinity of the subject site.

4.1 Groundwater Flow Direction

Prior to the installation of MW-1, MW-2 and MW-3, three (3) temporary Piezometers (PZ-1, PZ-2 and PZ-3) were installed on the subject site in an attempt to determine the local groundwater flow direction at the subject property and to use this data in making a determination as to the placement of the monitor wells. Elevations of the piezometer casings were established relative to an assumed benchmark using a survey rod and level. Fluid levels in the piezometers were determined using an interface probe which allows measurement of the depth to the water table to within 0.01'. By applying the gauging data to the survey data (See **Appendix 4; Groundwater Elevation Data**), groundwater elevations for the piezometers were obtained. Initial groundwater elevation data from the piezometers was then plotted on the site plan and contoured. **Figure 3, Groundwater Elevation Contour Map (8/8/97)**, indicates that groundwater flow at the site is to the north - northwest. In addition, the elevations of the monitor well casings of MW-1, MW-2 and MW-3 were also established relative to an assumed benchmark in the field. Groundwater elevations for the monitor wells were then determined by the above stated method. The groundwater elevation data for the monitor wells was also plotted on the site plan and contoured, **Figures 3 and 4, Groundwater Elevation Contour Maps,** illustrate the groundwater flow for the subject site on these separate events (towards the north-northwest).

4.2 Potable Well Survey

EAC conducted a survey for private water wells within a one-quarter (1/4) mile radius and public supply wells within a one-half (½) mile radius of the subject site at the Manatee County Environmental Management Department in Bradenton, Florida. The potable well survey was performed on in order to identify potential receptors of groundwater migrating from the site. Based on information obtained within the well files at this office, six (6) irrigation wells are

located within a 1/4-mile radius of the subject site. In addition, no domestic potable supply wells are located within a 1/4-mile radius of the subject site and no public supply wells are located within a ½-mile radius of the site. See **Figure 6** for the location of the irrigation wells discovered within a 1/4-mile radius of the subject property.

Well Type	Location of Well	Distance / Direction from Site:
Irrigation	102 Manatee Avenue West	Subject Property
Irrigation	404 1st Street East	100 feet East
Irrigation	333 6th Avenue West	800 feet Southwest
Irrigation	311 4th Street East	1/4-mile Northeast
Irrigation	410 4th Avenue East	1/4-mile East
Irrigation	U.S. 41 / South of River	1/4-mile North

5.0 CONCLUSIONS

Contamination Assessment activities have been performed at the subject site in accordance with FAC Chapter 62-770. Soil samples collected during the monitoring well installation procedure were subjected to headspace readings as prescribed by FAC Chapter 62-770.

Three (3) groundwater monitoring wells were installed in the immediate vicinity of the former UST area; one upgradient of the source area (MW-1), one downgradient of the source area (MW-3) and one in the source area (MW-2). Groundwater collected from MW-1 (upgradient well), MW-2 (source well), and MW-3 (downgradient well) were analyzed for compounds detectable by EPA method 602 as specified in FAC Chapter 62-770. All field work and groundwater sampling was conducted in accordance with EAC's approved Generic Comprehensive QAPP #930135-G.

During the August 27, 1997 groundwater sampling event, Toluene was found to be present in the sample collected from MW-1 (upgradient well) at a concentration of 0.56 parts per billion (ppb) (TVOA = 0.56 ppb). In addition, compounds detectable by EPA method 602 were not found to be present in any of the groundwater samples collected from MW-2 or MW-3 (source and downgradient wells). The monitoring well casings were surveyed, and their elevations were determined relative to an assumed benchmark located in the field. Depth to water measurements were obtained, and groundwater elevation contour maps were compiled on two different events, indicating that the groundwater flow direction at the subject site is to the north-northwest.

According to potable well information obtained from the Manatee County Environmental Management Department, six (6) irrigation wells are located within a 1/4-mile radius of the subject site. In addition, no domestic potable supply wells are located within a 1/4-mile radius of the subject site and no public supply wells are located within a ½-mile radius of the site.

6.0 RECOMMENDATION

Upon consideration of the following, EAC recommends that no further assessment or remediation for this site is warranted, and proposes that the site be considered for No Further Action (NFA) status pursuant to FAC Chapter 62-770.630 (3) and the October, 1990, FDEP No Further Action and Monitoring Only Guidelines for Petroleum Contaminated Sites (NFA/MO) document:

- No excessively contaminated soil were encountered during tank closure activities conducted on May 7, 1997 or during monitor well installation activities on August 21, 1997. Groundwater conditions at the site are well below the state's SRL's established in FAC Chapter 62-770.735 (a) for the Gasoline Analytical group. Furthermore, contaminate concentration levels at the subject site and potable well data for risk analysis meet No Further Action levels as defined in the "No Further Action and Monitoring Only Guidelines for Petroleum Contaminated Sites" document dated October, 1990.

- No "excessively contaminated" soil exists on the site.

- No phase separated hydrocarbons were encountered during the limited contamination assessment.

- Six (6) irrigation wells exist within a 1/4-mile radius of the site; six (6); No domestic potable supply wells are located within a 1/4-mile radius of the subject site and no public supply wells are located within a ½-mile radius of the site.

- The surficial soils beneath the site consist primarily of gray fine sand with shell fragments from land surface to approximately seven (7) feet BLS.

- Off-site migration of dissolved hydrocarbons in the area of MW-2 is not evident.

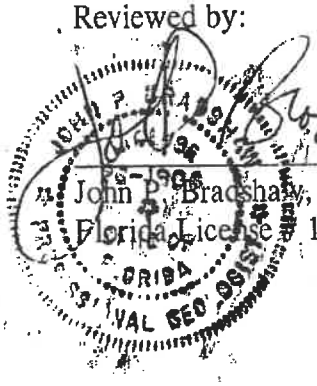
Based on the results of this Limited CA, EAC recommends that a "No Further Action (NFA) be implemented at this site.

7.0 STATEMENT OF PROFESSIONAL REVIEW

The discussions and conclusions contained in this Contamination Assessment Report have been reviewed by John P. Bradshaw, PG, President, Environmental Assessments + Consulting, Inc. and is found to conform to standard geological practices pursuant to Chapter 492 of the Florida Statutes. The professional services discussed herein have been performed using that degree of care and skill ordinarily exercised under similar circumstances by other geologists and engineers practicing in this field. No other warranty is expressed or implied as to the conclusions contained in this report.

This report was prepared by Environmental Assessments + Consulting, Inc.

Reviewed by:



John P. Bradshaw, PG
Florida License # 1906

9/4/97
Date

FIGURES

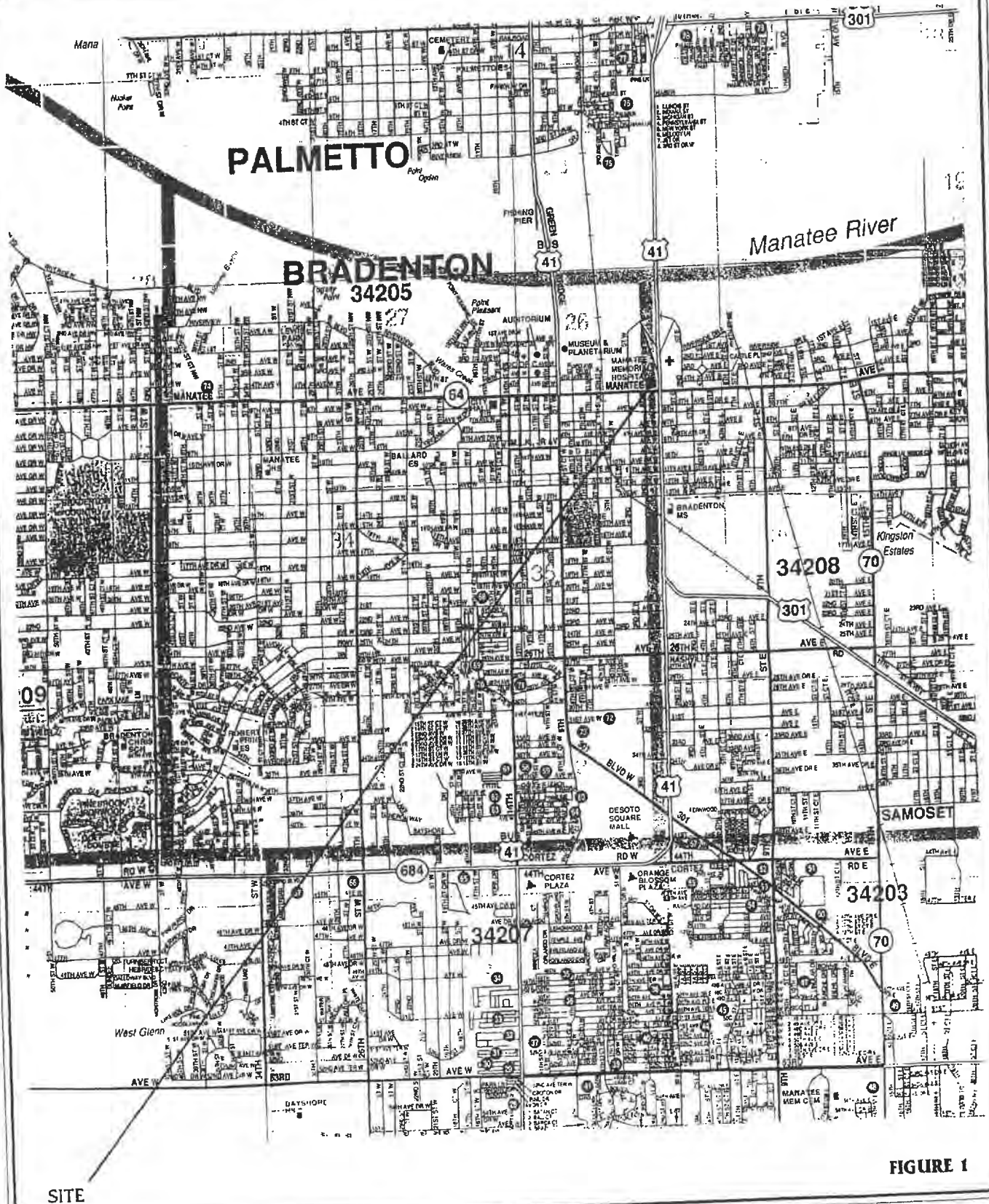


FIGURE 1

LOCATION MAP

Project No.: 97-1561
FDEP Facility ID No.
418630014

Scale:
1.5" = 1 Mile

BRADENTON HERALD PROPERTY
102 Manatee Avenue West
Bradenton, Florida

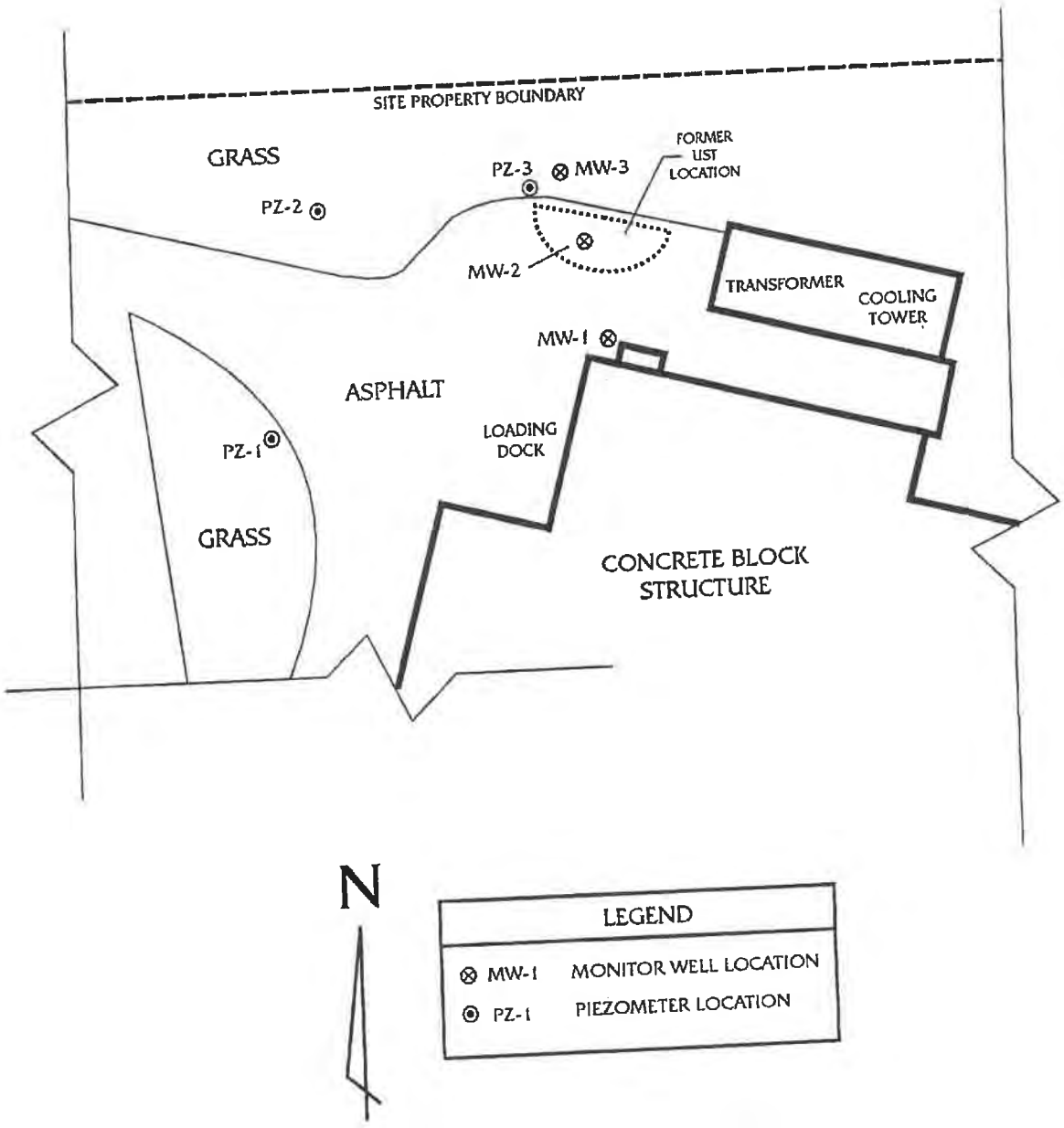


FIGURE 2

SITE PLAN

Project No.: 97-1561
FDEP Facility ID No.
418630014

Scale:
1" = 60'

BRADENTON HERALD PROPERTY
102 Manatee Avenue West
Bradenton, Florida

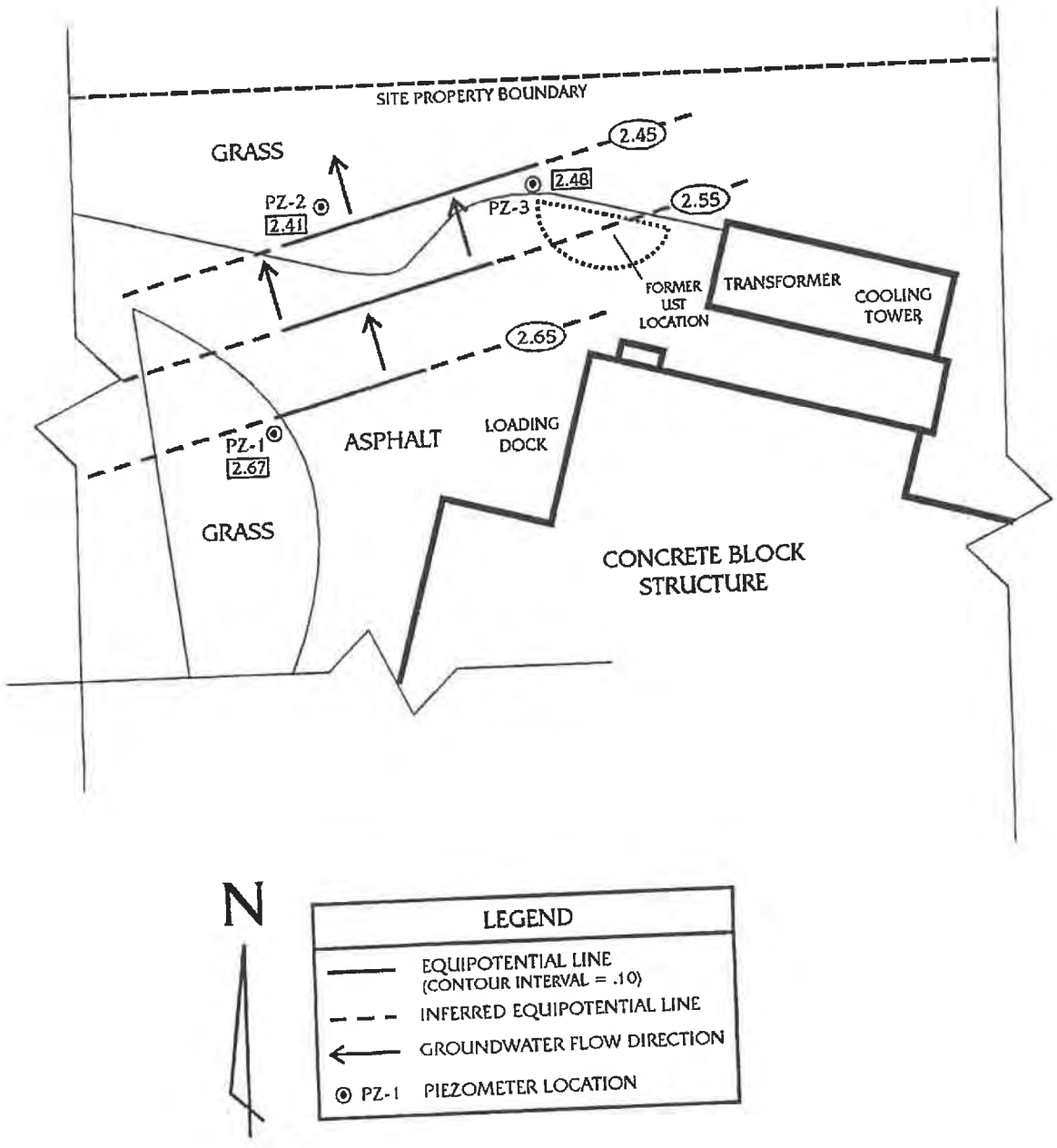


FIGURE 3

Project No.: 97-1561
FDEP Facility ID No.
418630014

Scale:
1" = 60'

GROUNDWATER ELEVATION CONTOUR MAP (8/8/97)

BRADENTON HERALD PROPERTY
102 Manatee Avenue West
Bradenton, Florida

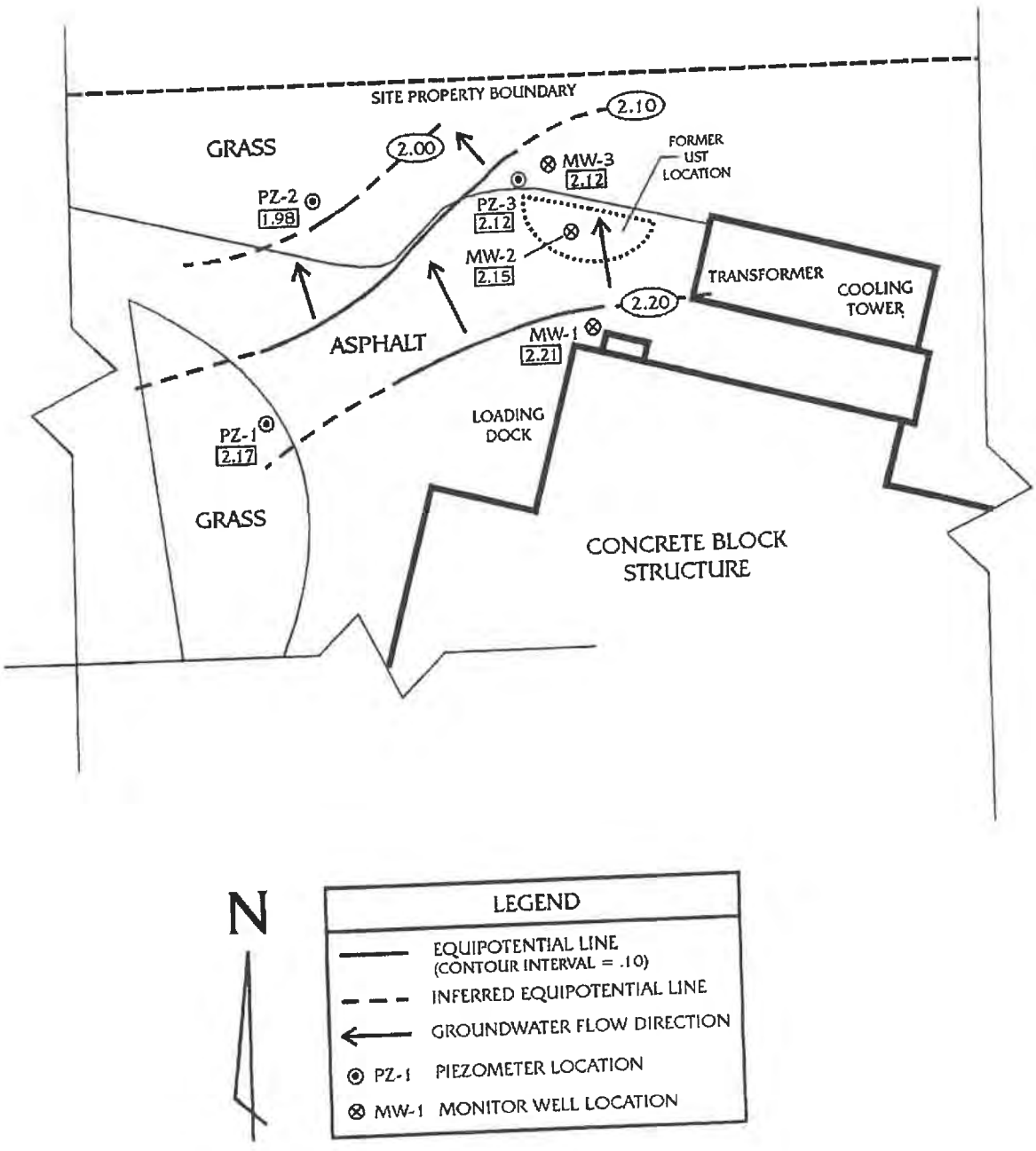


FIGURE 4

Project No.: 97-1561
FDEP Facility ID No.
418630014

Scale:
1" = 60'

GROUNDWATER ELEVATION CONTOUR MAP (8/27/97)

BRADENTON HERALD PROPERTY
102 Manatee Avenue West
Bradenton, Florida

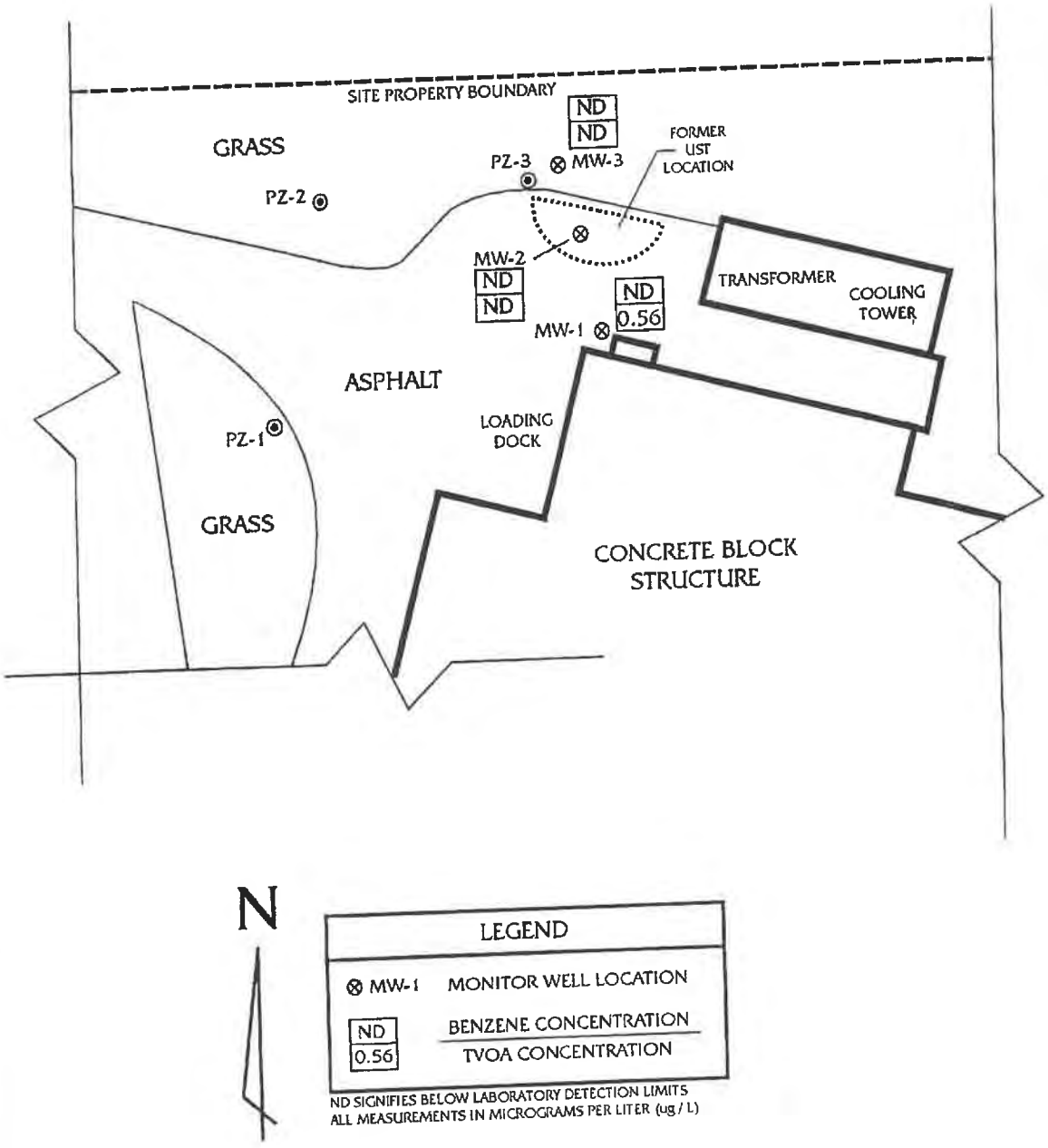


FIGURE 5

Project No.: 97-1561
FDEP Facility ID No.
418630014

Scale:
1" = 60'

BENZENE / TVOA CONCENTRATION MAP (8/27/97)

BRADENTON HERALD PROPERTY
102 Manatee Avenue West
Bradenton, Florida

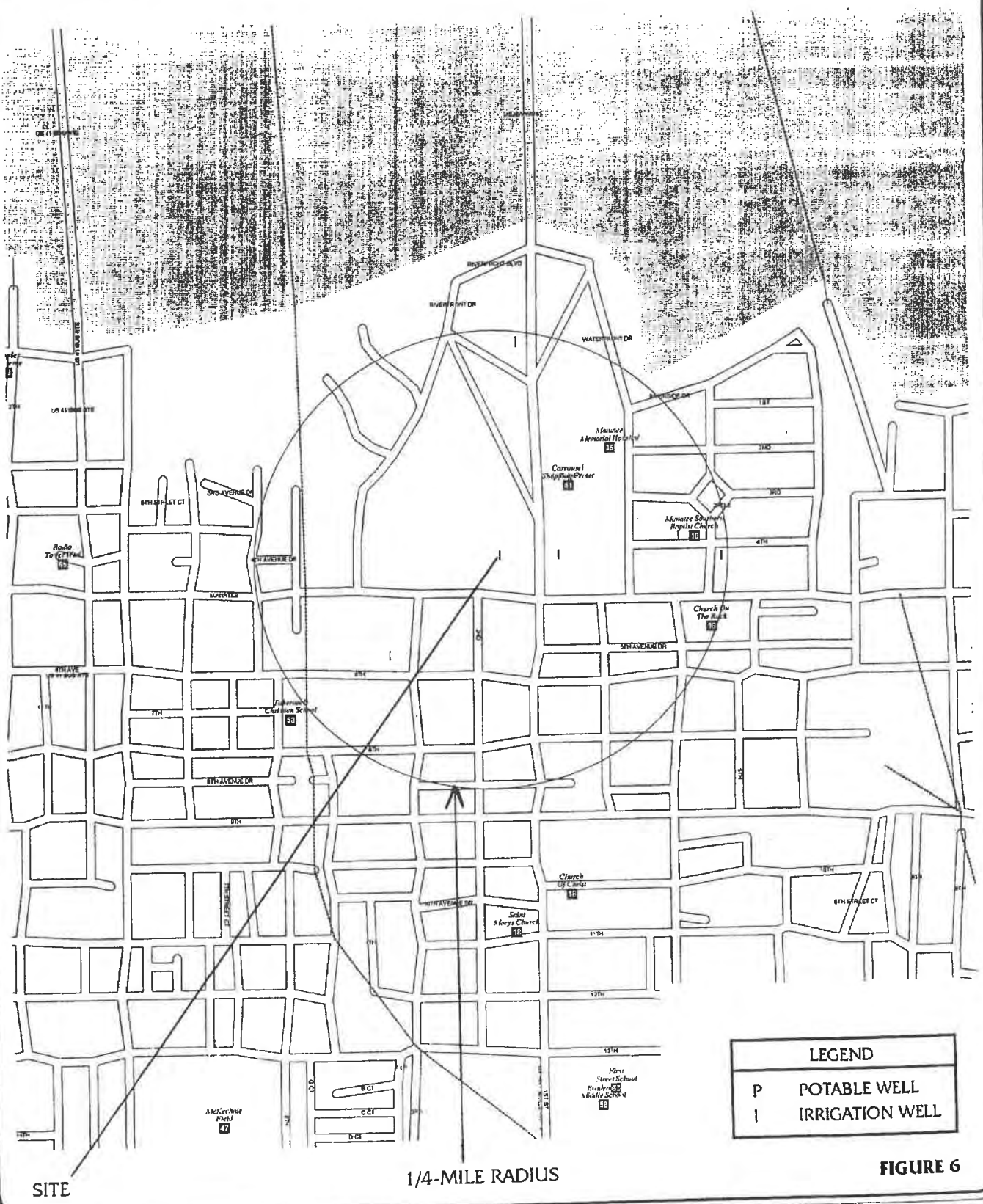


FIGURE 6

Project No.: 97-1561
FDEP Facility ID No.
418630014

Scale:
1.625" = .25 Mile

WELL INVENTORY MAP

BRADENTON HERALD PROPERTY
102 Manatee Avenue West
Bradenton, Florida

Department of Environmental Protection

DNC

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 18, 1998

Mr. Bob Hickman
Bradenton Herald
102 Manatee Avenue West
Bradenton, FL 34205-8810

BUREAU OF PETROLEUM STORAGE SYSTEMS
FEB 20 1998
PETROLEUM CLEANUP SECTION 4

Subject: Site Rehabilitation Completion Order
Bradenton Herald
102 Manatee Avenue West
Bradenton, Manatee County, Florida
FDEP Facility ID #4186300014

Dear Mr. Hickman:

Joan Ragland of the Bureau of Petroleum Storage Systems has reviewed the Contamination Assessment Report (CAR) Addendum and No Further Action Proposal (NFAP) dated December 22, 1997 (received December 23, 1997), prepared and submitted by Environmental Assessments + Consulting, Inc., for the discharge discovered on May 13, 1997 at this site. Documentation submitted with the NFAP confirms that criteria set forth in Rule 62-770.600(13), Florida Administrative Code (F.A.C.), have been met. The NFAP is hereby incorporated by reference in this Site Rehabilitation Completion Order (Order). Therefore, you are released from any further obligation to conduct site rehabilitation at the site, except as set forth below.

1. In the event concentrations of petroleum products' chemicals of concern increase significantly above the levels approved in this Order, or if a subsequent discharge of petroleum or petroleum product occurs at the site, the Department may require site rehabilitation to reduce concentrations of petroleum products' chemicals of concern to the levels approved in the NFAP or otherwise allowed by Chapter 62-770, F.A.C.

2. Additionally, you are required to properly abandon all monitoring wells (except compliance wells required by Chapter 62-761, F.A.C., for release detection) within 30 days after receipt of this Order. The monitoring wells must be abandoned in accordance with the requirements of Rule 62-532.500(4), F.A.C.

Persons affected by this Order have the following options:

If you choose to accept the above decision by the Department about this Order you do not have to do anything. This Order is final as of the date on the top of the first page of this Order.

If you disagree with the decision, you may do one of the following within 21 days after receipt of this Order:

1. File a petition for administrative hearing with the Office of the General Counsel of the Department within 21 days after receipt of this Order;

OR

2. File a request for an extension of time to file a petition for hearing with the Office of the General Counsel of the Department within 21 days after receipt of this Order. Such a request should be made if you wish to meet with the Department in an attempt to informally resolve any disputes without first filing a petition for hearing.

Please be advised that mediation of this decision, pursuant to Section 120.573, Florida Statutes (F.S.), is not available.

How to Request an Extension of Time to File a Petition for Hearing

A request for an extension of time to file a petition for hearing must be filed (received) in the Office of the General Counsel of the Department at 3900 Commonwealth Boulevard, MS-35, Tallahassee, Florida 32399-3000, within 21 days after receipt of this Order. Pursuant to Rule 28-106.111(3), F.A.C., a request for extension of time shall contain a certificate that the moving party has consulted with all other parties, if any, concerning the extension and that the Department and any other parties agree to said extension. Petitioner, if different from Bradenton Herald, shall mail a copy of the petition to Bradenton Herald at the time of filing. Timely filing a request for an extension of time tolls the time period within which a petition for administrative hearing must be filed until the request is acted upon.

How to File a Petition for Administrative Hearing

A person whose substantial interests are affected by this Order may petition for administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of the General Counsel of the Department at 3900 Commonwealth Boulevard, MS-35, Tallahassee, Florida 32399-3000, within 21 days after receipt

of this Order. Petitioner, if different from Bradenton Herald, shall mail a copy of the petition to Bradenton Herald at the time of filing. Failure to file a petition within this time period shall waive the right of anyone who may request an administrative hearing under Sections 120.569 and 120.57, F.S.

Pursuant to Rules 62-103.155 and 28-106.201, F.A.C., a petition for administrative hearing shall contain the following information:

a) The name, address, and telephone number of each petitioner, the name, address, and telephone number of the petitioner's representative, if any, the site owner's name and address, if different from the petitioner, the FDEP facility number, and the name and address of the facility;
b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
d) A statement of the material facts disputed by the petitioner, if any;
e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
f) A statement of which rules or statutes petitioner contends requires reversal or modification of the Department's action or proposed action; and
g) A statement of the relief petitioner seeks, stating precisely what petitioner wants the Department to do regarding the Department's action or proposed action.

This Order is final and effective as of the date on the top of the first page of this Order. Timely filing a petition for administrative hearing postpones the date this Order takes effect until the Department issues either a Final Order pursuant to an administrative hearing or an Order Responding to Supplemental Information provided pursuant to meetings with the Department.

Judicial Review

When this Order becomes final, any party to this Order has the right to seek judicial review of this Order pursuant to Section 120.68, F.S., by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Department clerk in the Office of the General Counsel, 3900 Commonwealth Boulevard, MS-35, Tallahassee, Florida 32399-3000. Simultaneously with filing a Notice of Appeal with the Department, petitioner must file a copy of the Notice of Appeal with the applicable filing fees, with the appropriate District Court of Appeal. The Notice of Appeal must be received by the Department clerk within 30 days from the date this Order was signed by an agency clerk (see below).

Please send a copy of the approved assessment document(s) to Ken Weber of the Southwest Florida Water Management District within 30 days of receiving this Order.

The FDEP Facility Number for this site is 418630014. Please use this identification on all future correspondence with the Department.

Questions

Should you have any questions regarding the legal processes, please contact the Office of the General Counsel at (850) 488-9730. Any questions regarding the Department's review of your No Further Action Proposal should be directed to Leslie Pedigo at (813) 744-6100 ext. 458 or Joan Ragland at (850) 922-9349 Contact with any of the above does not constitute a petition for administrative hearing.

Sincerely,

Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/lp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Patti L. Yagodzinski
Clerk

2/18/98
Date

cc: John Bradshaw, Environmental Assessments + Consulting, Inc.
Paul Panik, Manatee County EMD
Joan Ragland, FDEP-BPSS
Leslie Pedigo, FDEP-SWD

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Bradenton Herald

On-Site Inspection Start Date: 10/29/2008 **On-Site Inspection End Date:** 10/29/2008

ME ID#: 63207 **EPA ID#:** FLR000021345

Facility Street Address: 102 Manatee Ave W, Bradenton, Florida 34205-8894

Contact Mailing Address: 102 Manatee Ave W, Bradenton, Florida 34205-8810

County Name: Manatee **Contact Phone:** (941) 748-0411

NOTIFIED AS:

SQG (100-1000 kg/month)

CURRENT STATUS:

CESQG (<100 kg/month)

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Beth Knauss, Environmental Manager

Other Participants: Paul Panik; Wes Ripperger; David Payne, Press Room Supervisor; Chet Syjud, Operations Manager

LATITUDE / LONGITUDE: Lat 27° 29' 46.808" / Long 82° 33' 50.7072"

SIC CODE: 2711 - Manufacturing - newspapers

TYPE OF OWNERSHIP: Private

Introduction:

The Bradenton Herald production plant was inspected October 29, 2008 to determine its compliance with state and federal hazardous waste regulations. Paul Panik and Wes Ripperger from the Manatee County Department of Environmental Management accompanied the inspector. The Herald was represented by Chet Syjud, the current Operations Manager, and David Payne, the current Press Room Supervisor. Daily newspaper production has recently ceased at this facility, however the equipment is still on site and is being used for smaller commercial printing operations. The facility is currently only generating non hazardous or exempt wastes - used oil, universal waste lamps, universal waste batteries and silver recovery wastes that are being reclaimed. The facility has the potential to generate hazarous wastes when disposing of unused, out of date commercial chemicals.

Process Description:

Pre-press operations include layout, negative printing, plate imaging and plate development. Currently all artwork, photography and paste up is done by computer. Digital images of the pages to be printed are exposed onto film negatives, which are then developed in a two stage automated processor. The spent photographic solutions are discharged directly through a silver recovery unit to the city sewer. An independent contractor, The Imaging Network, maintains the units and manages the recovered silver and spent cartridges.

The drain pipe is accessible from the press room floor, and remnants of a previous silver recovery system were located next to the pipe. Mr. Payne said that this system had not been used for several years, and that the sludges generated in the system had not been cleaned out. This material appears to have been speculatively accumulated, and is therefore a hazardous waste. However, as the total amount of waste does not exceed 1,000 kg, storage of this material is not a violation of hazardous waste regulations. The material was disposed of November 7, 2008.

The negatives are placed on to aluminum plates, pre-coated with a light sensitive emulsion. High

intensity lights are used to expose the plates rather than UV light. Yellow photosafe fluorescent lighting is used in the imaging room to control exposure of the plates before they are developed in an automated processor. The processor is cleaned about once per month, and the spent developer and stabilizer solutions are also discharged directly to the sewer.

The plant has one large and one small web fed offset presses. Most jobs are run using standard four color inks. Special colors can be blended and run, usually on the small press. Black ink is received by tanker and stored in a tank located in the ink room. Cyan, magenta and yellow inks are received by tote. Ink lines have bag filters to ensure that particulate matter is not sent to the presses. Inks are recovered and recycled by scraping them into a trough, then filtering the residues, blending in additional black ink and then by piping the ink back to the black ink tank. The spent filters generated by the process are one of the facility's primary non hazardous waste streams. The sinks and floor drains from the ink rooms and press areas drain to a four compartment settling tank. Waste water that separates from the ink is discharged to the City of Bradenton sewer system. Ink is periodically pumped out and disposed of as non hazardous. The last disposal event for this material was in November 2007, when 800 gallons of waste was pumped by EQ Tampa. Waste disposal is brokered through Stone Environmental of Placida, Florida.

The ink room has one parts washer that uses a high flash (over 200 F) solvent for roller cleaning. The same solvent is used with rags for blanket cleaning. Used rags are laundered by Aramark. Used oil generated in the press rooms was being accumulated in blue poly drums, which were stored under an open stairway. One was open with a funnel in the bung. As the stairway is not a fire evacuation route, this does not appear to be a violation of the fire code. Loose sheets of paper with the words "used oil" were placed on top of the drums, but the labels were somewhat obscured by debris falling through the stair grating. It was recommended that the sides of the containers be clearly labeled, as loose labels can blow off drums. Two drums of spent parts washer solution and a drum of ink filter waste were also stored in this location. The Herald does not store wastes outside.

Used oil was also being generated in the chiller room. The drum in this room was open, with a funnel in the bung. It was located within two feet of an overhead door to the outside, and was not provided with secondary containment, as required by FAC Rule 62-710.401(6). It was labeled "waste oil" rather than "used oil," also a violation of this rule. Two open unlabeled five gallon buckets of used oil were located further from the door in this room. These issues were corrected subsequent to the inspection.

The mechanical repair shop included a small parts washer that was not being used, a soldering station, a cabinet of assorted cleaning chemicals that appeared to be in good condition, a closed, labeled 5 gallon bucket containing universal waste batteries and a closed labeled tube container for universal waste lamps. Several open boxes of good lamps were also present, and a few of the lamps in those boxes appeared to be spent. Mr. Payne checked these lamps to ensure that all spent lamps were being stored in the closed, labeled container subsequent to the inspection. Universal wastes are disposed of through Envirolight.

The facility maintains fire extinguishers and a carbon dioxide based fire suppression system in the press room. Spill control equipment was on a wall adjacent to the ink storage area, along with spill control procedures and emergency contact information. One of the emergency coordinators listed was no longer with the Herald, however this is not a violation as the facility is conditionally exempt.

POTENTIAL VIOLATIONS AND AREAS OF CONCERN WITH NO ASSIGNED AREA:

Pre-existing Potential Violations and Areas of Concern:

Used Oil Generator Checklist

Type: Violation

Rule:	279.22(c)
Question Number:	5.1.3
Explanation:	Two five gallon buckets of used oil were not labeled. A 55 gallon drum was labeled "waste oil" rather than Used Oil. The violations were corrected subsequent to the inspection.
Corrective Action:	Ensure all containers of used oil are clearly labeled with the words "used oil."

Type:	Area Of Concern
Rule:	62-710.401(6)
Question Number:	5.1.6.1
Explanation:	One container of used oil in the chiller room was stored without secondary containment and within two feet of an overhead door leading to the outside of the facility. This was corrected subsequent to the inspection.
Corrective Action:	Ensure all used oil containers are provided with secondary containment if leaks could release oil to the environment.

Summary of Potential Violations and Areas of Concern:

Potential Violations

Rule Number	Area	Date Cited	Explanation
Used Oil Generator Checklist			
279.22(c)		10/29/2008	Two five gallon buckets of used oil were not labeled. A 55 gallon drum was labeled "waste oil" rather than Used Oil. The violations were corrected subsequent to the inspection.

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Used Oil Generator Checklist			
62-710.401(6)		10/29/2008	One container of used oil in the chiller room was stored without secondary containment and within two feet of an overhead door leading to the outside of the facility. This was corrected subsequent to the inspection.

Conclusion:

The Bradenton Herald was out of compliance with used oil storage requirements. This was corrected subsequent to the inspection. Universal waste lamp management requirements were also discussed.

History:

Activity Closed Date: 11/14/2008

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Beth Knauss	Environmental Manager
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
Beth Knauss	FDEP SW District — 11/13/2008
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION** — **DATE**
Paul Panik	
INSPECTOR NAME	
NO SIGNATURE	Manatee County DEM
INSPECTOR SIGNATURE	**ORGANIZATION**
Wes Ripperger	
INSPECTOR NAME	
NO SIGNATURE	Manatee Co DEM
INSPECTOR SIGNATURE	**ORGANIZATION**
David Payne	Press Room Supervisor
INSPECTOR NAME	**INSPECTOR TITLE**
NO SIGNATURE	Bradenton Herald
INSPECTOR SIGNATURE	**ORGANIZATION**
Chet Syjud	Operations Manager
REPRESENTATIVE NAME	**REPRESENTATIVE TITLE**
NO SIGNATURE	Bradenton Herald
REPRESENTATIVE SIGNATURE	**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:
Facility Name: Bradenton Herald
On-Site Inspection Start Date: 09/24/2024 **On-Site Inspection End Date:** 09/24/2024
ME ID#: 63207 **EPA ID#:** FLR000021345
Facility Street Address: 102 Manatee Ave W, Bradenton, Florida 34205-8894
Contact Mailing Address: 102 Manatee Ave W, Bradenton, Florida 34205-8810
County Name: Manatee **Contact Phone:** (941) 748-0411

NOTIFIED AS:
SQG (100-1000 kg/month)

WASTE ACTIVITIES:
Generator: CLOSED **Closure:** Facility Closure

INSPECTION TYPE:
File Review Inspection for Closed Facility

INSPECTION PARTICIPANTS:
Principal Inspector: Andrew Gordon, Inspector
Other Participants: No Representative present

LATITUDE / LONGITUDE: Lat 27° 29' 46.808" / Long 82° 33' 50.7072"
NAIC: Data is missing from FIESTA
TYPE OF OWNERSHIP: Private

Introduction:
A file review of Bradenton Herald was conducted by the Florida Department of Environmental Protection (Department), on October 1, 2024, to verify its generator status. Through the Department's file review, it was determined that the facility is no longer generating hazardous waste at this location.

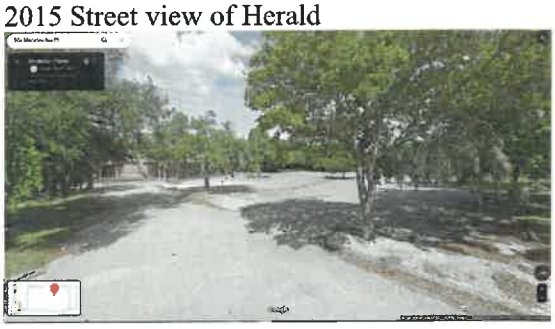
Process Description:
Based upon photographic documentation and phone conversation the property is no longer a hazardous waste generating facility, current photos of the facility indicate that the property is an apartment complex. As of 2016 the Bradenton Herald has been demolished. The process at the facility does not generate any hazardous waste.

PHOTO ATTACHMENTS:

Current google maps of new apartment building



2015 Street view of Herald



2014 Google Earth



2016 Google Earth



2024 Google Earth



Conclusion:
Based on file review conducted on September 24, 2024 Bradenton Herald is a closed facility.

1.0: Pre-Inspection Checklist

Requirements:
The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)			✓
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11			✓

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Andrew Gordon	Inspector	
Principal Investigator Name	**Principal Investigator Title**	
	DEP	10/01/2024
Principal Investigator Signature	**Organization**	**Date**

No Representative present
Representative Name

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:

Approver: Michael Miller **Inspection Approval Date:** 10/24/2024

Site No. 46

Manatee Memorial Hospital

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/25/2026 Last Data Refresh: 03/24/2026 Report Generated from DOPPLER

District Southwest

County Manatee

ID 9100283

Name MANATEE MEMORIAL HOSPITAL
206 2ND ST E
BRADENTON, FL 34208-1042

Contact GLORIA COOPER

Phone (941) 745-7260

Type Fuel user/Non-retail

Status OPEN

Latitude 27° 29' 49.6237

Longitude 82° 33' 45.3868

LL Method DPHO

LL Status REVIEWED

Status Date 03/13/2003

Account Owner Information

Name MANATEE MEMORIAL HOSPITAL
206 2ND ST E
Bradenton, FL 34208-1042

Contact KEVIN ZERN

Phone (941) 745-7301

Email KEVIN.ZERN@UHSINC.COM

Effective Date 02/14/1991

Placard # / Date 715980 - 06/05/2025

No Property Owner Information Found

Tank	Tank Size	Content	Installed	Placement	Status
5	6000	Emerg Generator Diesel (G)	06/01/1998	ABOVEGROUND	In Service (U)

Constructions **Pipings** **Monitorings**

(C) Steel (M) Spill containment bucket (N) Flow shut-Off (O) Tight fill (P) Level gauges/alarms (R) Double wall - tank jacket	(A) Abv, no soil contact (B) Steel/galvanized metal (I) Suction piping system	(1) Continuous electronic sensing (F) Monitor dbl wall tank space (Q) Visual inspection of ASTs

Tank	Tank Size	Content	Installed	Placement	Status
6	6000	Emerg Generator Diesel (G)	10/01/2006	ABOVEGROUND	In Service (U)

Constructions	Pipings	Monitorings
(C) Steel (M) Spill containment bucket (N) Flow shut-Off (O) Tight fill (P) Level gauges/alarms (R) Double wall - tank jacket	(A) Abv, no soil contact (B) Steel/galvanized metal (I) Suction piping system	(1) Continuous electronic sensing (F) Monitor dbl wall tank space (Q) Visual inspection of ASTs

Tank	Tank Size	Content	Installed	Placement	Status
7	18205	Emerg Generator Diesel (G)	11/01/2019	ABOVEGROUND	In Service (U)

Constructions	Pipings	Monitorings
(C) Steel (I) Double wall (L) Compartmented (M) Spill containment bucket (P) Level gauges/alarms (Q) DEP approved protection	(X) No piping associated w/tank	(F) Monitor dbl wall tank space (Q) Visual inspection of ASTs (Z) DEP approved monitoring

Tank	Tank Size	Content	Installed	Placement	Status
2	5000	Emerg Generator Diesel (G)	07/01/1965	UNDERGROUND	Removed from Site (B)

Constructions	Pipings	Monitorings
(C) Steel	(B) Steel/galvanized metal	(I) Not required

Tank	Tank Size	Content	Installed	Placement	Status

3	5000	Emerg Generator Diesel (G)	07/01/1965	UNDERGROUND	Removed from Site (B)

Constructions
(C) Steel

Pipings
(B) Steel/galvanized metal

Monitorings
(I) Not required

Tank	Tank Size	Content	Installed	Placement	Status
4	6136	Emerg Generator Diesel (G)	08/01/1991	UNDERGROUND	Removed from Site (B)

Constructions
(E) Fiberglass
(I) Double wall

Pipings
(C) Fiberglass
(I) Suction piping system

Monitorings
(F) Monitor dbl wall tank space
(K) Monitor dbl wall pipe space

Tank	Tank Size	Content	Installed	Placement	Status
1	550	Fuel Oil - Onsite Heat (M)		UNDERGROUND	Removed from Site (B)

Constructions
(C) Steel

Pipings
(B) Steel/galvanized metal

Monitorings
(Y) Unknown

Insurance Documents

FR Type	Effective Date	Expiration Date	Company Name
INSURANCE	04/30/2022	04/30/2023	ADMIRAL INSURANCE COMPANY
INSURANCE	04/30/2020	04/30/2021	ADMIRAL INSURANCE COMPANY
INSURANCE	04/30/2019	04/30/2020	ADMIRAL INSURANCE COMPANY
INSURANCE	04/30/2018	04/30/2019	ADMIRAL INSURANCE COMPANY
INSURANCE	04/30/2017	04/30/2018	ADMIRAL INSURANCE COMPANY
INSURANCE	04/30/2016	04/30/2017	ADMIRAL INSURANCE COMPANY
INSURANCE	04/30/2015	04/30/2016	ADMIRAL INSURANCE COMPANY
INSURANCE	01/01/2013	01/01/2014	ACE
INSURANCE	01/01/2012	01/01/2013	ACE
INSURANCE	01/01/2011	01/01/2012	ACE
INSURANCE	01/01/2010	01/01/2011	ACE
INSURANCE	01/01/2009	01/01/2010	ACE

System Tests

Type	Due Date
Annual Operability Test	09/17/2020
Annual Operability Test	09/17/2020
Annual Operability Test	09/11/2019
Annual Operability Test	09/11/2019

ANNUAL OPERABILITY - RELEASE DETECTION	03/31/2024
ANNUAL OPERABILITY - OVERFILL PROTECTION	03/31/2024

Legacy Compliance Activity Information

Activity Code	Date Initiated	Date Completed	Results	Inspector	AST/UST Count	Description
TCI	04/26/2006	05/02/2006	SIGNIFICANT OUT-OF-COMPLIANCE	MARK TRETHEWEY	1/0	COMPLIANCE ASSURANCE
RRBD	08/15/2005	08/19/2005		REEDER_J	0/0	COMPLIANCE ASSURANCE
	Completion Notes RECEIVED CLOSURE ASSESSMENT REPORT FOR ONE 6,000 GALLON UST FROM FET, INC.					
TXI	06/21/2005	06/21/2005	IN-COMPLIANCE	MARK TRETHEWEY	0/1	COMPLIANCE ASSURANCE
	Completion Notes UST REMOVED FROM SITE, CRUSHED FOR DISPOSAL.					
RRBD	04/26/2005	04/26/2005				COMPLIANCE ASSURANCE
TCI	04/06/2005	04/14/2005	SIGNIFICANT OUT-OF-COMPLIANCE	MARK TRETHEWEY	1/1	COMPLIANCE ASSURANCE
TCI	12/30/2003	01/12/2004	IN-COMPLIANCE	ALDEN	1/1	COMPLIANCE ASSURANCE
TCI	03/13/2003	03/31/2003	MINOR OUT-OF-COMPLIANCE	KNOWLES	1/1	COMPLIANCE ASSURANCE
TCI	10/24/2001	10/29/2001	IN-COMPLIANCE	FIELDS	1/1	COMPLIANCE ASSURANCE
TCI	11/20/2000	11/29/2000	IN-COMPLIANCE	FIELDS	1/1	COMPLIANCE ASSURANCE
TCI	09/24/1999	10/04/1999	IN-COMPLIANCE	POUSO	0/0	COMPLIANCE ASSURANCE

Compliance Activity Information

Activity Code	Date Completed	Results	Inspector	AST/UST Count	Description

Record Document	05/26/2023	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Record Document	05/26/2023	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Letter	05/26/2023	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	03/13/2023	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	03/13/2023	Minor Out of Compliance	TRETHEWEY_MB_1	3/0	Routine Compliance
Letter	03/13/2023	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	11/27/2019	Satisfied	TRETHEWEY_MB_1		Installation
Site Inspection	11/27/2019	In Compliance	TRETHEWEY_MB_1	1/0	Installation
Issue Document	10/10/2019	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	10/10/2019	In Compliance	TRETHEWEY_MB_1	2/0	Routine Compliance
Issue Document	10/10/2019	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	08/29/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	08/29/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	08/29/2017	In Compliance	TRETHEWEY_MB_1	2/0	Routine Compliance
Issue Document	05/08/2015	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	05/08/2015	In Compliance	TRETHEWEY_MB_1	2/0	Routine Compliance
Issue Document	05/01/2013	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	04/30/2013	In Compliance	TRETHEWEY_MB_1	2/0	Routine Compliance
Record Document	04/26/2012	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Letter	04/10/2012	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	04/10/2012	Minor Out of Compliance	TRETHEWEY_MB_1	2/0	Routine Compliance
Site Inspection	04/26/2011	In Compliance	MASON_RS_1	2/0	Routine Compliance

Site Inspection	05/07/2010	In Compliance	TRETHEWEY_MB_1	2/0	Routine Compliance
Site Inspection	04/17/2009	In Compliance	TRETHEWEY_MB_1	2/0	Routine Compliance
Record Document	01/07/2009	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Record Document	01/07/2009	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Letter	04/21/2008	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	04/21/2008	Minor Out of Compliance	TRETHEWEY_MB_1	2/0	Routine Compliance
Phone Conversation	10/02/2007	Satisfied	RANDOLPH_L		Enforcement
Enforcement Tracking	10/02/2007	Closed Without Enforcement	RANDOLPH_L		Enforcement
Site Inspection	09/10/2007	In Compliance	REEDER_JH_1	2/0	Non-Compliance
Enforcement Referral	08/28/2007	Accepted	RANDOLPH_L		Enforcement
Letter	06/19/2007	Satisfied	REEDER_JH_1		Non-Compliance
Site Inspection	06/19/2007	Major Out of Compliance	REEDER_JH_1	1/0	Installation
Letter	05/23/2007	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	05/23/2007	Major Out of Compliance	TRETHEWEY_MB_1	2/0	Routine Compliance
Enforcement Referral Activity - OLD	07/26/2006	Terminated	CULBRETH_L		Enforcement

No Open AOCs Found

No Open Violations Found

No Discharges Found

Florida Department of Environmental Protection
Twin Towers Office Bldg. 2600 Blair Stone Road. Tallahassee, Florida 32399-2400
Division of Waste Management
Bureau of Petroleum Storage Systems

Storage Tank Facility Annual Site Inspection Report

Facility Information

Facility ID:	9100283	County: MANATEE	
Facility Name:	MANATEE MEMORIAL HOSPITAL 206 2ND ST E BRADENTON, FL 34208-1042		
Latitude:	27° 29' 49.6237"		
Longitude:	82° 33' 45.3868"		
L/L Method:	DPHO		

Inspection Date: 05/23/2007
Facility Type: Z - Other Regulated Facility
Of Inspected ASTs: 2
USTs: 0
Mineral Acid Tanks: 0

Inspection Result

Result : Major Out of Compliance

Description: Facility is out of compliance

A re-inspection will be scheduled on or after 90 days to verify correction of the non-compliance items noted.

Financial Responsibility Over Due

Financial Responsibility: SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER

Insurance Carrier:

Effective Date: 01/01/2005 Expiration Date: 01/01/2006

Signatures

TKMNEM - MANATEE COUNTY ENVIRONMENTAL MANAGEMENT DEPT
Storage Tank Program Office

MARK TRETHEWEY
Inspector Name

M. Trethewey
Inspector Signature

(941) 742-5980
Storage Tank Program Office Phone Number

Gloria Cooper
Facility Representative Name

No signature available
Facility Representative Signature

System Tests

Test Name	Due Date	Completed Date	Result

Overdue Tests

Annual Operability Test	03/15/2007

New Violations

Significance Name: Minor

Rule Number(s): 62-761.600(1)(b), 62-761.640(1)(c)

Violation Text: No release detection response level described in writing.

Explanation: Release detection response levels were not provided.

Corrective Action: Immediately provide Manatee County EMD with copies of new RDRLs.

Significance Name: Minor

Rule Number(s): 62-761.400(2)(f)

Violation Text: Placard is not displayed in plain view.

Explanation: Placard for 2005-2006 is displayed. Current Placard not posted. Additional tank has been filled.

Corrective Action: Immediately display the current Registration Placard. Ensure that all tank systems are registered prior to filling with fuel.

Attachments:

5-23-2007 Tank #1 Fuel Gauge (Old Tank)



5-23-2007 Tank #2 Fuel Guage (New Tank)



Significance Name: Minor

Rule Number(s): 62-761.450(1)(a)1.

Violation Text: 30 day notification before installation or upgrade not submitted.

Explanation: Notification was not received prior to the installation of the new 6000 gal. AST.

Corrective Action: Notify Manatee County EMD at least 30 days prior to installation activities for inspection scheduling. An Installation Inspection will be scheduled to ensure that approved equipment is in place and documented.

Significance Name: Minor

Rule Number(s): 62-761.400(2)(a)

Violation Text: Registration fees not paid.

Explanation: Facility has installed an additional tank.

Corrective Action: Immediately pay all fees associated with the new tank.

Significance Name: Minor

Rule Number(s): 62-761.450(1)(a)3.a., 62-761.450(1)(a)3.b.

Violation Text: 48-hour notification before installation/closure activity, change in service status, and tightness tests not submitted.

Explanation: 48 hour notification was not provided prior to installation activity.

Corrective Action: Notify Manatee County EMD prior to installation activities to confirm scheduled inspections.

Significance Name: SNC-B

Rule Number(s): 62-761.400(3)(a)1.

Violation Text: No financial responsibility.

Explanation: Current Proof of Financial Responsibility was not provided. Last FR expired on1/1/2006. This is a repeat violation that has not been resolved.

Corrective Action: Immediately provide Manatee County EMD with current CFR and Proof of Financial Responsability.

Significance Name: SNC-B

Rule Number(s): 62-761.600(1)(d)

Violation Text: Release detection not performed at least once a month.

Explanation: Release Detection Records were not provided for inspection.

Corrective Action: Immediately provided Mabnatee County EMD with copies of Release Detection Records from 4/2006 to present.

Outstanding Violations

Significance Name: SNC-B

Rule Number(s): 62-762.401(3)(a)1.

Violation Text: No financial responsibility

Explanation: NO FINANCIAL RESPONSIBILITY

Corrective Action: MIGRATED VIOLATION - NO CORRECTIVE ACTION AVAILABLE

Inspection Comments

05/23/2007 RECORDS: # 9100283, 5-23-2007

Placard: # 248077; issued 5/12/2006, 1 tank listed. Current Placard not displayed. Facility now has 2 tanks.

Financial Responsibility: Not Provided.

CoFR: Not Provided.

RDRL: Not Provided.

Release Detection:

Inspection Comments

a. This Facility has the following release detection methods:

1. Visual inspection of tank and equipment, electronic gauging of tank interstice.

b. Facility monthly release detection results:

1. Reviewed the monthly visual inspection records were not provided.

PHYSICAL:

Tank and piping: Tanks, piping and equipment are in good condition.

Note: Facility has added an additional 6000 gal. tank with no notification.

Florida Department of Environmental Protection
Twin Towers Office Bldg. 2600 Blair Stone Road. Tallahassee, Florida 32399-2400
Division of Waste Management
Bureau of Petroleum Storage Systems

Storage Tank Facility Installation Site Inspection

Facility Information

Facility ID:	9100283	County: MANATEE	
Facility Name:	MANATEE MEMORIAL HOSPITAL 206 2ND ST E BRADENTON, FL 34208-1042		
Latitude:	27° 29' 49.6237"		
Longitude:	82° 33' 45.3868"		
L/L Method:	DPHO		
Inspection Date:	06/19/2007		
Facility Type:	Z - Other Regulated Facility		
# Of Inspected ASTs:	1		
USTs:	0		
Mineral Acid Tanks:	0		

Inspection Result

Result : Major Out of Compliance

Description: Facility is out of compliance

A re-inspection will be scheduled on or after 90 days to verify correction of the non-compliance items noted.

Financial Responsibility Over Due

Financial Responsibility: SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER

Insurance Carrier:

Effective Date: 01/01/2005 Expiration Date: 01/01/2006

Signatures

TKMNEM - MANATEE COUNTY ENVIRONMENTAL MANAGEMENT DEPT
Storage Tank Program Office

(941) 742-5980
Storage Tank Program Office Phone Number

JON REEDER
Inspector Name

Mailed to Gloria Cooper / Manatee Memorial Hospital
Facility Representative Name

Jon H Reeder
Inspector Signature

No signature available
Facility Representative Signature

System Tests

Test Name	Due Date	Completed Date	Result
Completed Tests			
Annual Operability Test	06/19/2008	06/19/2007	Passed

New Violations

Significance Name: Minor

Rule Number(s): 62-762.401(1)(a), 62-762.401(1)(b)

Violation Text: Systems not registered.

Explanation: A new 6,000 gallon ConVault petroleum storage tank system was installed 10/17/2006 but has not been registered.

Corrective Action: Immediately register the new tank system with the Department of Environmental Protection in Tallahassee.

Significance Name: Minor

Rule Number(s): 62-762.451(1)(a)3.a., 62-762.451(1)(a)3.b., 62-762.451(1)(a)3.c.

Violation Text: 48-hour notification before installation/closure activity, API 653 inspection, change in service status, and tightness tests not submitted.

Explanation: 48-hour notification was not received prior to the installation of the new 6,000 gallon AST.

Corrective Action: This violation is not able to be corrected and will be closed with the non-compliance letter.

Significance Name: SNC-B

Rule Number(s): 62-762.401(3)(a)1.

Violation Text: No financial responsibility

Explanation: Current Proof of Financial Responsibility was not provided. Last FR expired on 1/1/2006. This is a repeat violation that has not been resolved.

Corrective Action: Immediately provide Manatee County EMD with current documents for Proof of Financial Responsability.

Significance Name: SNC-B

Rule Number(s): 62-762.601(1)(d)

Violation Text: Release detection not performed at least once a month.

Explanation: Release Detection Records were not provided.

Corrective Action: Immediately provided Mabnatee County EMD with copies of Release Detection Records from 4/2006 to present.

Significance Name: Minor

Rule Number(s): 62-762.451(1)(a)1.

Violation Text: 30 days before installation or upgrade not submitted

Explanation: 30-day notification prior to petroleum storage tank system installation was not provided.

Corrective Action: This violation is not able to be corrected and will be closed with the non-compliance letter.

Significance Name: Minor

Rule Number(s): 62-762.601(1)(b), 62-762.641(1)(c)

Violation Text: No release detection response level described in writing.

Explanation: Release detection response levels were not provided.

Corrective Action: Immediately provide Manatee County EMD with copies of new RDRLs.

Significance Name: Minor

Rule Number(s): 62-762.401(2)(a)6.

Violation Text: Registration placard is not displayed in plain view.

Explanation: Placard for 2005-2006 is displayed. Current Placard not posted. Additional tank has been filled.

Corrective Action: Immediately display the current Registration Placard. Ensure that all tank systems are registered prior to filling with fuel.

Inspection Comments

06/19/2007 INSTALLATION INSPECTION ONLY. Certain records and equipment associated with routine compliance inspections were not checked.

06/19/2007 SITE VISITS:

06/19/2007 Jon Reeder on-site at 10:00 AM. Met with Mr. Matt Collura of JMP Solutions
(Please note that this installation inspection is being completed after-the-fact.)

Contractor:
(Tank)

Manatee Memorial Hospital
206 2nd Street, E.
Bradenton, FL 34208
(941) 745-7260

Contractor:
(Piping & Release Detection)

Chris Collura
JMP Solutions
4406 N. Lauber Way
Tampa, FL 33614
Cell: 813.918.2177
Office: 813.875.8997 X108

The ConVault 6,000 gallon double-wall AST (EQ-201) was installed and put into service on 10/17/2006. No notifications were provided.

Note: There is an existing 6,000 gallon ConVault that was upgraded with new interstitial monitoring, remote spill containment box, steel aboveground piping, OPW overfill protection and gauge, and valving.

The tank system is equipped with an OPW 61F-Stop (EQ-225) for overfill protection and an OPW 200TG Electronic Level Gauge with numerical counter readout for secondary overfill protection. The interstice is monitored with a Veeder-Root float sensor wired to a TLS-300C Console (EQ-614). OPW remote spill containment box (EQ-226) was provided and the fill pipe is equipped with a poppet valve. Proper signage for the spill containment boxes was missing but the contractor was in the process of correcting the problem.

The interstitial alarms for both tanks were tested by removing and tripping the sensors to activate the alarm at the console. Both sensors were found to be operational.

RELEASE DETECTION, as of 6/19/2007:

a. Monthly visual inspections which includes electronic interstitial monitoring of the double-walled tanks. Monthly test tapes will be collected for remote verification of operability. Inspections shall also include the tanks exterior, remote spill containment boxes, all aboveground steel piping and valving, and surrounding area.

b. Annual operability test of the tanks interstitial sensors.

Inspection Attachments

Inspection Attachments

01. REMOTE SPILL CONTAINMENT - 6/19/2007



02. OPW 200TG ELECTRONIC LEVEL GAUGE - 6/19/2007



03. DAY TANKS - 6/19/2007



Inspection Attachments

04. GENERAL VIEW - 5/23/2007



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

04/21/2022
Michael Bollom, Director of Support Services
Manatee Memorial Hospital
206 2nd St E
Bradenton, FL 34208-1042

The Florida Department of Environmental Protection has reviewed your submittal for a hazardous waste DEP/EPA Identification Number or status/information change.

Based on the information received, you have been issued the following number or reports for **Manatee Memorial Hospital** located at **206 2nd St E, Bradenton, FL 34208-1042**

DEP/EPA Identification Number: **FLD982098782**

Your facility status is the following: **Small Quantity Generator (SQG), Hazardous Waste Pharmaceutical - Healthcare Facility.**

Florida Administrative Code 62-730 requires all persons who generate, transport, recycle, store, or dispose of hazardous waste to notify the department of their hazardous waste activities. You are required to renotify on form 8700-12FL when there are changes in your operations which would affect your status, activity or contact information. Additional hazardous waste information including the 8700-12FL form can be found at:
https://floridadep.gov/waste/permitting-compliance-assistance/content/hazardous-waste-management-main-page.

Please note that pending program registrations, certifications, or permits will be sent to you separately. **To review the details of your status**, visit:
https://fldeploc.dep.state.fl.us/www_RCRA/Reports/handler_results.asp?epaid=FLD982098782.

For further assistance, please contact me at (850) 245-8707 or email me at Jeff.Gregg@dep.state.fl.us.

Sincerely,

SK Valenta
for

Jeff Gregg
Environmental Manager
Waste Compliance Assistance Program

ME ID: 24258,

MANATEE COUNTY
FLORIDA

5/26/2023

Mr. Joseph Kline
Manatee Memorial Hospital
206 2nd Street East
Bradenton, FL 34206-1042

RE: Return to Compliance
Manatee Memorial Hospital, 206 2nd Street East, Bradenton, FL 34206-1042
Facility #419100283

Dear Mr. Kline:

Manatee County Natural Resources Dept., contracted with Hillsborough County for the Florida Department of Environmental Protection, issued a Compliance Assistance Offer letter to the above-referenced facility on 3/13/2023. Based on the information provided 3/31/2023, the facility was determined to have returned to compliance with the Department's Storage Tank rules and regulations.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Mark Trethewey at 941-742-5980 X1880 / or mark.trethewey@mymanatee.org

Sincerely,

M Trethewey

Mark Trethewey
Senior Environmental Specialist
Natural Resources Department
Environmental Protection Division

JAMES SATCHER * AMANDA BALLARD * KEVIN VAN OSTENBRIDGE * MIKE RAHN * VANESSA BAUGH * JASON BEARDEN * GEORGE W. KRUSE
District 1 *District 2* *District 3* *District 4* *District 5* *At Large* *At Large*

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

July 7, 2000

Ms. Ellen Ohrwall
Manatee Memorial Hospital
206 Second Street East
Bradenton, Florida 34208

Re: Manatee Memorial Hospital
FLD 982 098 782
Warning Letter #237412
Manatee County

Dear Ms. Ohrwall:

A review of the file for the referenced case indicates that the violations cited in the Warning Letter have been resolved. This enforcement action is now closed.

Sincerely,

William Kutash
Administrator
Division of Waste Management

WK/gtd

cc: Morgan Leibrandt, HWR Section
Compliance File

MANATEE MEMORIAL HOSPITAL

RECEIVED
JUL 05 2000
Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

June 30, 2000

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Re: MANATEE MEMORIAL HOSPITAL
FLD 982 098 782
Warning Letter #237412
Manatee County

Dear Ms. Geztoff,

The purpose of this correspondence is to respond to violations found during a hazardous waste program field inspection conducted on April 17, 2000 at Manatee Memorial Hospital. The inspection was performed by Mr. Gilbert T. Dembeck and we used the inspection to assist us in improving our existing hazardous waste program. We corrected eight noted deficiencies by June 2, 2000. The two not corrected at that time have been corrected now. Attached are copies of two missing manifests. We also changed signs reading "Waste Oil" to signs that say "Used Oil".

All noted violations have been corrected. If I can be of any further assistance please call me at (941) 745-7260.

Sincerely,

Ellen M Ohrwall

Ellen M. Ohrwall, LHRM, CSHM
Manager of Safety and Loss Control
Enclosure (1)

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. F L D 9 8 2 0 9 8 7 8 2 — Manifest Document No. 21 8 — 2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: MANATEE MEMORIAL HOSPITAL
206 2nd St., East
Bradenton, FL 34208
4. Generator's Phone (941 745-7260)

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: CHEMICAL CONSERVATION CORP.
6. US EPA ID Number: F L D 9 8 0 5 5 9 7 2 8
C. State Transporter's ID
D. Transporter's Phone: 407-859-4441

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: CHEMICAL CONSERVATION OF GA.
1612 James P. Rodgers Circle
Valdosta, GA 31601
10. US EPA ID Number: G A D 0 9 3 3 8 0 8 1 4
G. State Facility's ID
H. Facility's Phone: 912-244-0474

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, Waste Xylenes 3, UN1307, PG II	X	1	DM	55	G	D001 F003
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
(a) MANG3739
(b)
(c)

K. Handling Codes for Wastes Listed Above: m001

15. Special Handling Instructions and Additional Information
EMERGENCY RESPONSE: Chem-Trec 1-800-424-9300
EMERGENCY CONTACT: 941-745-7260

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [illegible] — Signature: [signature] — Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: John Eberhard — Signature: John Eberhard — Month 3 Day 18 Year 99

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Mandy Freeman — Signature: Mandy Freeman — Month 03 Day 21 Year 99

TRANSPORTER #2

[redacted] Emergency Contact Telephone Number [redacted]

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. F L D 9 8 2 0 9 8 7 8 2 | Manifest Document No. 92098 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: MANATEE MEMORIAL HOSPITAL
206 2nd St., East
Bradenton, FL 34208
4. Generator's Phone (9 4 1) 7 4 5 - 7 2 6 0

A. State Manifest Document Number
B. State Generator's ID

5. Transporter 1 Company Name: CHEMICAL CONSERVATION CORP.
6. US EPA ID Number: F L D 9 8 0 5 5 9 7 2 8
C. State Transporter's ID
D. Transporter's Phone 407-859-4441

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: CHEMICAL CONSERVATION OF GA.
1612 James P. Rodgers Circle
Valdosta, GA 31601
10. US EPA ID Number: G A D 0 9 3 3 8 0 8 1 4
G. State Facility's ID
H. Facility's Phone 912-244-0474

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a.	RQ, Waste Xylenes 3, UN1307, PG II	X	1	DM	55	G	D001 F003
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
(a) MAMG3739
(b)
(c)
(d)

K. Handling Codes for Wastes Listed Above: M061

15. Special Handling Instructions and Additional Information
EMERGENCY RESPONSE: Chem-Trec 1-800-424-9300
EMERGENCY CONTACT: 941-745-7260

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [illegible] | Signature: [signature] | Month Day Year: 9 20 98

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: John Eberhard | Signature: [signature] | Month Day Year: 9 21 98

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name: Charlotte Dorminey | Signature: Charlotte Dorminey | Month Day Year: 10 1 98

GENERATOR

TRANSPORTER #2

MANATEE MEMORIAL HOSPITAL

RECEIVED
JUN 06 2000
Department of Environmental Protection
BY SOUTHWEST DISTRICT

June 2, 2000

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Re: MANATEE MEMORIAL HOSPITAL
FLD 982 098 782
Warning Letter #237412
Manatee County

Dear Ms. Geztoff,

The purpose of this correspondence is to respond to violations found during a hazardous waste program field inspection conducted on April 17, 2000 at Manatee Memorial Hospital. The inspection was performed by Mr. Gilbert T. Dembeck and we used the inspection to assist us in improving our existing hazardous waste program. We have corrected eight noted deficiencies and two deficiencies will be corrected by July 1, 2000, at the latest. The two not corrected involve assistance needed from two different waste haulers. They have been contacted and are in the process of sending copies of two missing manifests and replacing signs supplied, by them, that do not meet requirements.

A summary of violations and our corrective actions for each violation is attached for your review. If I can be of any further assistance please call me at (941) 745-7260.

Sincerely,

Ellen M Ohrwall

Ellen M. Ohrwall,LHRM, CSHM
Manager of Safety and Loss Control
Enclosure (1)

REGULATION	SUMMARY OF ALLEGED VIOLATIONS	CORRECTIVE ACTION WE HAVE TAKEN
40 CFR 262.11	Failure to determine if the containers of unidentified material meet the definition of hazardous waste.	We have determined that the containers of unidentified material did not meet the definition of hazardous waste. We had them removed.
40 CFR 262.34 (a) (2)	Failure to mark each container with the date the hazardous waste is first accumulated in the container.	We are now marking each container with the date the hazardous waste is first accumulated in the container.
40 CFR 262.34 (a) (3)	Failure to label or mark each container holding hazardous waste with the words "Hazardous Waste".	We have labeled each container holding hazardous waste with the words "Hazardous Waste".
40 CFR262.42 (b)	Failure to submit an Exception Report to the Department when return copies of manifest numbers 92098 and 21899 with the handwritten signature of the owner or operator of the designated facility were not received	We have requested copies of manifest numbers 92098 and 21899 with the handwritten signature of the owner or operator of the designated facility and will maintain in facility records for three years. They will be here by 7/1/00/
40 CFR 265.174	Failure to inspect areas where hazardous waste containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.	A new form and policy were written and supervisor delegated to inspect hazardous waste containers in storage weekly and document with the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made. And the date and nature of any repairs or other remedial actions.
40 CFR 273.14 (a)	Failure to label or mark each universal waste battery or the container in which the batteries are contained with any of the following phrases: "Universal Waste Battery(ies)", "Waste Batter(ies), or "Used Battery(ies).	Engineering department has labeled each universal waste battery or the container in which the batteries are contained with any of the following phrases: "Universal Waste Battery (ies)", "Waste Battery (ies)", or "Used Battery (ies)".
40 CFR 279.22 (c) (1)	Failure to label or mark containers used to store used oil with the words "Used Oil"	We have contacted the waste oil hauler to change the label or mark containers used to store used oil with the words "Used oil". They will be changed by 7/1/00.
62-737.400 (4),F.A.C	Failure to train employees in the proper handling, and emergency cleanup and containment procedures applicable to its handling of spent universal waste lamps or devices. Failure to keep a copy of these emergency procedures at the business location.	Engineering has trained employees in the proper handling, and emergency cleanup and containment procedures applicable to the handling of spent universal waste lamps or devices. A written copy of these emergency procedures at the facility is being written and will be complete and distributed by 7/1/00.
62-737.400 (5) (a), F.A.C.	Failure to place broken lamps or clean up residues resulting from the breakage of universal waste lamps in closed structurally sound containers.	We have placed broken lamps or clean up residues resulting from the breakage of universal waste lamps in closed structurally sound containers.
62-737.400 (5) (b) 1., F.A.C.	Failure to label universal waste lamps or the containers in which they are stored with the words "Spent Mercury-Containing Lamps for Recycling", "Universal Waste Mercury Lamps". " Waste Mercury Lamps". Or "Used Mercury Lamps".	Engineering has labeled universal waste lamps or the containers in which they are stored with the words "Spent Mercury-Containing Lamps for Recycling".

Ellen M Shrewell
5/30/00

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

May 5, 2000

Ms. Ellen Ohrwall
Manatee Memorial Hospital
206 Second Street East
Bradenton, Florida 34208

Re: Manatee Memorial Hospital
FLD 982 098 782
Warning Letter #237412
Manatee County

Dear Ms. Ohrwall:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on April 17, 2000, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 10 of the report lists a summary of alleged violations of Department Rules.

Section 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

You are requested to contact Gilbert Dembeck at (813)744-6100, extension 399, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter. Alternatively, you may respond in writing within thirty (30) days with documentation that all alleged violations have been corrected. Please see Section 11 of the inspection report for a list of recommended corrective actions.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), F.S. If your fail to respond and document a return to compliance within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA), you may be designated as significantly out of compliance. This could result in issuance of a formal administrative complaint or "Notice of Violation" (NOV) and assessment of civil penalties if the case is not resolved within 150 days of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,

for Deborah A. Getzoff
Director of District Management
Southwest District

DAG/gtd

Attachment

cc: Morgan Leibrandt, HWR Section
Compliance File

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒Routine ☐Complaint ☐Follow-Up ☐Permitting ☐Pre-Arranged

FACILITY NAME Manatee Memorial Hospital EPA ID # FLD 982 098 782

STREET ADDRESS 206 Second Street East, Bradenton, Florida 34208

MAILING ADDRESS Same

COUNTY Manatee PHONE 941/745-7260 DATE 4/17/2000 TIME 8:40 A.M.

NOTIFIED AS: ☐ N/A	*CURRENT STATUS*:
☐ Non Handler	☐ Non Handler
☐ CESQG (<100 kg/mo.)	☐ CESQG (<100 kg/mo.)
☒ SQG (100-1000 kg/mo.)	☒ SQG (100-1000 kg/mo.)
☐ Generator (>1000 kg/mo.)	☐ Generator (>1000 kg/mo.)
☐ Transporter	☐ Transporter
☐ Transfer Facility	☐ Transfer Facility
☐ Interim Status TSD Facility	☐ Interim Status TSD Facility
☐ TSD Facility	☐ TSD Facility
Unit Type(s):	Unit Type(s):
☐ Exempt Treatment Facility	☐ Exempt Treatment Facility
☐ Used Oil:	☒ Used Oil: Generator

2. **APPLICABLE REGULATIONS:**

☐ 40 CFR 261.5	☒ 40 CFR 262	☐ 40 CFR 263	☐ 40 CFR 264
☐ 40 CFR 265	☒ 40 CFR 266	☒ 40 CFR 268	☒ 40 CFR 273
☒ 40 CFR 279	☒ 62-710, FAC	☒ 62-737, FAC	☐ 62-740, FAC

3. **RESPONSIBLE OFFICIAL(s):**

Ellen Ohrwall, Manager Safety & Loss Control

4. **INSPECTION PARTICIPANTS:**

Ellen Ohrwall Mike Cooper Gilbert T. Dembeck, FDEP

5. **LATITUDE/LONGITUDE** 27°29'50" 82°33'42"

6. **SIC Code:** 8062

7. **TYPE OF OWNERSHIP:** Private Federal State County Municipal

8. **PERMIT #:** N/A **ISSUE DATE:** **EXP. DATE:**

9. PROCESS DESCRIPTION:

Manatee Memorial Hospital is a full service acute care facility.

The majority of hazardous waste generated at the facility is xylene from the pathology lab. No waste xylene is accumulated in the lab, but each time it is generated it is placed into a properly labeled satellite accumulation container which is then taken directly to the hazardous waste storage area where is put into a storage drum. The only other waste generated by the pathology lab is waste formalin solution, which is discharged to the Manatee County sewer system after chemical treatment.

The hospital has 7 x-ray processing unit each of which is equipped with a Enviro-Filter silver recovery system. After treatment the waste fixer is discharged to the Manatee County sewer system.

All outdated pharmaceuticals are sent to Easy Returns for reverse distribution.

Building maintenance generates other wastes which require special handling. A large number of spent fluorescent lamps were being accumulated in the maintenance storage area in open containers. While not yet a state requirement, new federal regulations require that spent mercury containing lamps be stored in closed containers. The containers were not labeled, as required by **62-737.400(5)(b)1, F.A.C.**, and several broken lamps were in the open boxes in violation of **62-737.400(4)** and **62-737.400(5)(a), F.A.C.** A 55 gallon drum being used for accumulating spent batteries was not labeled as required by **40 CFR 273.14(a)**. Records confirmed that the spent lamp and batteries were being sent out as universal waste for recycling.

The hazardous waste storage area is a raised platform within secondary containment covered by a roof. It is located outside in the waste handling area. In the hazardous waste storage area were 3 full drums of waste xylene. One of these drums was not labeled "Hazardous Waste" and none of these drums were marked with accumulation start dates in violation of **40 CFR 262.34(a)(3)** and **40 CFR 262.34(a)(2)**. Within the storage area was a gallon container of unidentified contents, and next to the storage area was a old 5 gallon containers labeled "Xylene", and 4 other containers of unidentified material. Failure to do a waste determination on this material is a violation of **40 CFR 262.11**. Next to the hazardous waste storage area was a containment for 2 drums of waste oil. These drums are required to be labeled "Used Oil" by **40 CFR 279.22(c)(1)**. No inspections of the hazardous waste storage area are made in violation of **40 CFR 265.174**.

Opposite this area was a laundry machine which was being returned to a vendor. Next to the machine were 5 partial containers of what was said to be laundry products, one of which was labeled "Corrosive". Only one of these container was labeled as a product. The other containers had no labels and three of them were open. Since the contents of these drums are unknown, **40 CFR 262.11** requires that waste determination be done on these drums to ensure proper disposal.

All hazardous waste disposal manifests and land disposal restriction notices were properly prepared. The only discrepancy noted was that the facility did not have signed returned copies of manifest numbers 92098 and 21899 and had not filed an exception report in violation of **40 CFR 262.42(b)**.

Although it appears that the facility is normally a conditionally exempt small quantity generator, hazardous waste disposal manifests indicate that the facility is at times an episodic small quantity generator. Therefore, to ensure compliance, it is recommended that the facility continue to follow the small quantity generator regulations at all times.

10. SUMMARY OF ALLEGED VIOLATIONS:

40 CFR 262.11	Failure to determine if the containers of unidentified material meet the definition of hazardous waste.
40 CFR 262.34(a)(2)	Failure to mark each container with the date the hazardous waste is first accumulated in the container.
40 CFR 262.34(a)(3)	Failure to label or mark each container holding hazardous waste with the words "Hazardous Waste".
40 CFR 262.42(b)	Failure to submit an Exception Report to the Department when return copies of manifest numbers 92098 and 21899 with the handwritten signature of the owner or operator of the designated facility were not received.
40 CFR 265.174	Failure to inspect areas where hazardous waste containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.
40 CFR 273.14(a)	Failure to label or mark each universal waste battery or the container in which the batteries are contained with any of the following phrases: "Universal Waste Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."
40 CFR 279.22(c)(1)	Failure to label or mark containers used to store used oil with the words "Used Oil."
62-737.400(4), F.A.C.	Failure to train employees in the proper handling, and emergency cleanup and containment procedures applicable to its handling of spent universal waste lamps or devices. Failure to keep a copy of these emergency procedures at the business location.
62-737.400(5)(a), F.A.C.	Failure to place broken lamps or clean up residues resulting from the breakage of universal waste lamps in closed structurally sound containers.
62-737.400(5)(b)1., F.A.C.	Failure to label universal waste lamps or the containers in which they are stored with the words "Spent Mercury-Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps."

11. RECOMMENDATIONS:

40 CFR 262.11	Determine if the containers of unidentified material meet the definition of hazardous waste. Manage and dispose of accordingly.
40 CFR 262.34(a)(2)	Mark each container with the date the hazardous waste is first accumulated in the container.

40 CFR 262.34(a)(3)	Label or mark each container holding hazardous waste with the words "Hazardous Waste".
40 CFR 262.42(b)	Secure copies of manifest numbers 92098 and 21899 with the handwritten signature of the owner or operator of the designated facility. Maintain in facility records for three years.
40 CFR 265.174	Inspect hazardous waste containers in storage weekly and document with the date and time of the inspection, the legibly printed name of the inspector, the number of containers, the condition of the containers, a notation of the observations made, and the date and nature of any repairs or other remedial actions.
40 CFR 273.14(a)	Label or mark each universal waste battery or the container in which the batteries are contained with any of the following phrases: "Universal Waste Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."
40 CFR 279.22(c)(1)	Label or mark containers used to store used oil with the words "Used Oil."
62-737.400(4), F.A.C.	Train employees in the proper handling, and emergency cleanup and containment procedures applicable to the handling of spent universal waste lamps or devices. Keep a written copy of these emergency procedures at the facility.
62-737.400(5)(a), F.A.C.	Place broken lamps or clean up residues resulting from the breakage of universal waste lamps in closed structurally sound containers.
62-737.400(5)(b)1., F.A.C.	Label universal waste lamps or the containers in which they are stored with the words "Spent Mercury-Containing Lamps for Recycling", "Universal Waste Mercury Lamps", "Waste Mercury Lamps" or "Used Mercury Lamps."

Report prepared by: Gilbert T. Dembeck Date 5/3/2000
Gilbert T. Dembeck
Environmental Specialist III

Approved by: _____ Date 5/5/00
Elizabeth Knauss
Environmental Manager

Site No. 47

GenesisCare USA of Florida LLC

FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Interim Secretary

03/10/2021
Shanna-Leigh Warner, Center Lead
GenesisCare USA of Florida LLC
200 3rd Ave W Ste 210
Bradenton, FL 34205

The Florida Department of Environmental Protection has reviewed your submittal for a hazardous waste DEP/EPA Identification Number or status/information change.

Based on the information received, you have been issued the following number or reports for **GenesisCare USA of Florida LLC** located at **200 3rd Ave W Ste 210, Bradenton, FL 34205-8633**

DEP/EPA Identification Number: **FLR000242305**

Your facility status is the following: **Very Small Quantity Generator (VSQG), Hazardous Waste Pharmaceutical - Healthcare Facility.**

Florida Administrative Code 62-730 requires all persons who generate, transport, recycle, store, or dispose of hazardous waste to notify the department of their hazardous waste activities. You are required to re-notify on form 8700-12FL when there are changes in your operations which would affect your status, activity or contact information. Additional hazardous waste information including the 8700-12FL form can be found at: https://floridadep.gov/waste/permitting-compliance-assistance/content/hazardous-waste-management-main-page.

Please note that pending program registrations, certifications, or permits will be sent to you separately. **To review the details of your status**, visit: https://fldeploc.dep.state.fl.us/www_RCRA/Reports/handler_results.asp?epaid=FLR000242305.

For further assistance, please contact me at (850) 245-8707 or email me at Glen.Perrigan@dep.state.fl.us.

Sincerely,

Jennifer Simmons for

Glen Perrigan
Environmental Manager
Waste Compliance Assistance Program

ME ID: 145063, Email Address: licensing@21co.com

Site No. 48

US Highway Bridge over the Manatee River (Bridge No. 130053)

TIERRA

July 25, 2011

HNTB Corporation
10210 Highland Manor Drive, Suite 140
Tampa, Florida 33610

Attn: Douglas Burkhart, PE
Project Manager

RE: NESHAP Asbestos and Protective Coatings Survey Report
Hernando DeSoto Bridge (FDOT Structure No. 130053)
US 41/US 301 (Tamiami Trail/1st St. E.) Bridge over the Manatee River
Manatee County, Florida
FPN: 425033-1-22-01
Work Assignment No: 027
Tierra Project No.: 6512-11-011

Mr. Burkhart:

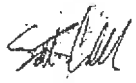
The purpose of this report is to present the results of an asbestos survey and protective coating survey performed on July 13, 2011, at the above referenced project. We understand that this survey was requested due to the planned renovation and/or demolition of the structure.

Regulated Asbestos Containing Materials (RACM) were identified at the site. Please refer to the attached report for details.

Tierra appreciates the opportunity to provide this service to HNTB. If you have any questions regarding this report, please contact our office at your earliest convenience.

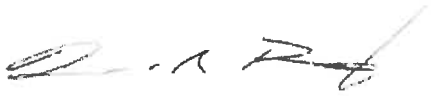
Respectfully Submitted,

TIERRA INC.



cn=Scott Crandall, o, ou,
email=scrandall@quantum
dataprocessing.com, c=US
2011.07.27 08:29:18 -04'00'

Scott S. Crandall, P.E.
Florida Licensed Asbestos Consultant
License No. EA0000060



Donald R. Polanis, CGC
Environmental Scientist

ASBESTOS AND PROTECTIVE COATING SURVEY REPORT

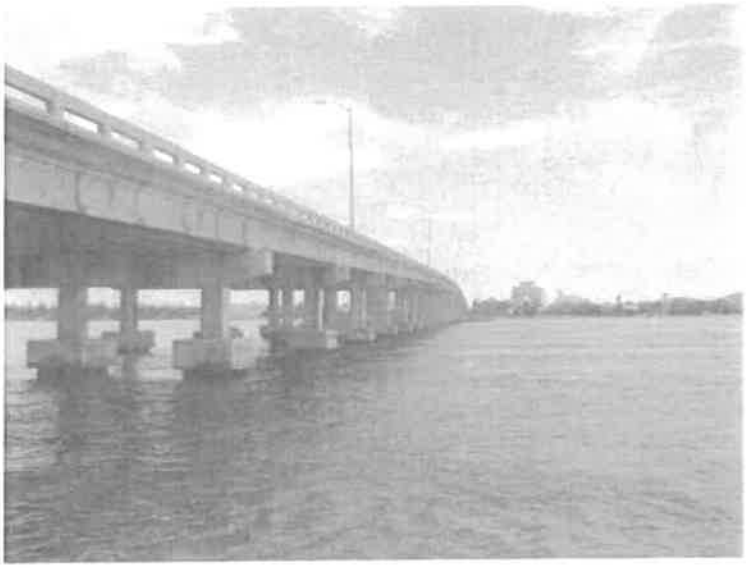
Hernando DeSoto Bridge
FDOT Structure No. 130053

US 41/US 301 (Tamiami Trail/1st St. E.) Bridge over the Manatee River
Manatee County, Florida

FPID: 425033-1-22-01

Tierra Project No.: 6512-11-011

July 2011



Prepared for:

HNTB Corporation
10210 Highland Manor Drive, Suite 140
Tampa, Florida 33610

Prepared by:

Tierra, Inc.
7351 Temple Terrace Highway
Tampa Florida 33637

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LIST OF APPENDICES

Appendix A Laboratory Results
Appendix B Photograph Log
Appendix C Personnel Training Certificates

EXECUTIVE SUMMARY

Tierra, Inc. (Tierra) conducted an asbestos and protective coating survey of the Hernando Desoto Bridge, which crosses the Manatee River. The structure is located on US 41, in Manatee County, Florida. The bridge is identified as FDOT Structure Number 130053. It is our understanding that the FDOT is planning to renovate and/or demolish the bridge structure. The purpose of this survey was to identify and sample suspect asbestos-containing materials (ACM) and heavy metals based protective coatings to provide information regarding the identity, location, condition and approximate quantities of these materials so that proper remediation and disposal methods can be evaluated.

The survey was conducted on July 13, 2011 by an Asbestos Hazard Emergency Response Act (AHERA) accredited inspector in general accordance with the sampling protocols established in Environmental Protection Agency (EPA) 40 Code of Federal Regulations (CFR) 763. Seventeen (17) bulk samples were collected from five (5) homogeneous areas of suspect ACM. Chrysotile asbestos was identified at 1.5% in the felt paper located between the end bents and the bridge decking. This material was determined to be friable and classified as Regulated Asbestos Containing Material (RACM) per National Emission Standards for Hazardous Air Pollutants (NESHAP). Additionally, residual felt paper strips, observed on the underside of the decking, were found to contain less 1% chrysotile asbestos. The strips were presumably used to tape cracks in the deck forms and remained adhered to the concrete after the removal of the forms.

Steel bearing plates at the bridge we observed to be painted. The paint did not contain lead in a quantity to meet EPA's definition of Lead Based Paint (LBP).

1.0 INTRODUCTION

Tierra, Inc. (Tierra) conducted an asbestos and protective coating survey of the Hernando Desoto Bridge, which crosses the Manatee River. The structure is located on US 41, in Manatee County, Florida. The bridge is identified as FDOT Structure Number 130053. The survey was conducted on July 13, 2011 by an Asbestos Hazard Emergency Response Act (AHERA) accredited asbestos inspector. Suspect asbestos-containing material (ACM) samples were collected in general accordance with the sampling protocols outlined in EPA regulation 40 CFR 763. Samples were delivered to an accredited laboratory for analysis by polarized light microscopy.

1.1 Project Objective

We understand this asbestos survey was requested due to the planned renovation and/or demolition of the existing bridge structure. EPA regulation 40 CFR 61, Subpart M, National Emission Standards for Hazardous Air Pollutants (NESHAP), prohibits the release of asbestos fibers and other hazardous air pollutants to the atmosphere during renovation or demolition activities. The asbestos NESHAP requires that potentially regulated asbestos-containing building materials be identified, classified and quantified prior to planned disturbances or demolition activities. No previous reports or design plans were provided.

2.0 BRIDGE DESCRIPTION

The date for the construction of the bridge is unknown. The bridge is a cast in place, concrete beam, raised span bridge, consisting of four (4) lanes, two lanes servicing north and south bound traffic. It is approximately 2,250 feet in length and 60 feet in width. It is constructed on driven concrete piles with concrete piers and bent caps supporting concrete beams and a cast in place concrete bridge deck. Both sides are lined with concrete curbing and concrete guardrails. Guardrails at the approaches are galvanized "W" channel steel on wood posts.

3.0 FIELD ACTIVITIES

The survey was conducted by Mr. Scott Crandall, PE, an AHERA-accredited asbestos inspector. A copy of Mr. Crandall's asbestos inspector certificate is presented in **Appendix C**. The survey was conducted in general accordance with the sample collection protocols established in EPA regulation 40 CFR 763, the AHERA. A summary of the survey activities performed is provided below. The survey was limited to areas accessible by foot and included the bridge surface and underneath the structure at both end of the bridge.

3.1 Visual Assessment

Our survey activities began with visual observation of the structure to identify homogeneous areas of suspect ACM and painted coatings. A homogeneous material consists of building materials that appear similar throughout in terms of color, texture and date of application. Building materials identified as steel, concrete, glass, wood, masonry, metal or rubber were not considered suspect ACM. If surfaces are painted and/or otherwise covered with protective coating those materials are noted and sampled.

3.2 Physical Assessment

A physical assessment of each homogeneous area of suspect ACM was conducted to assess the friability and condition of the materials. A friable material is defined by the EPA as a material which can be crumbled, pulverized or reduced to powder by hand pressure when dry. Friability was assessed by physically touching suspect materials.

3.3 Sample Collection

Based on results of the visual observation, bulk samples of suspect ACM and protective coatings were collected in general accordance with AHERA sampling protocols. Representative samples of suspect materials were collected in each homogeneous area. Tierra personnel collected bulk samples using wet methods as applicable to reduce the potential for fiber release. Samples were placed in sealable containers and labeled with unique sample numbers using an indelible marker.

Seventeen (17) bulk samples were collected from five (5) homogeneous materials of suspect ACM. A summary of suspect ACM samples collected during the survey is included in Section 5.0.

A visual inspection of the structure for protective coatings and painted surfaces indicated the steel bearing plates were painted. One (1) sample of the paint was collected for heavy metals analysis.

3.4 Sample Analysis

Bulk samples of ACM were submitted under chain of custody to Dove Environmental Corporation (Dove) of Miami, Florida for analysis by polarized light microscopy with dispersion staining techniques per EPA methodology (40 CFR 763, Subpart F). The percentage of asbestos, where applicable, was determined by microscopic visual estimation. Dove is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP Accreditation No. 102053-0).

The U.S. Environmental Protection Agency (USEPA) and the Occupational Safety and Health Administration (OSHA) define asbestos containing material (ACM) as any material which contains greater than one percent asbestos. When samples analyzed by Polarized Light Microscopy contain asbestos in amounts less than ten percent (< 10%), a more exact method of analysis called point counting may be performed at the client's request. The EPA point count method allows a sample in which asbestos was visually detected, but which is visually estimated to have 10% or less asbestos, to be quantified using a point count procedure. If not point counted, a sample in which asbestos was visually detected and estimated (including trace to ≤1%) must be assumed to be greater than 1% and treated as an ACM. The EPA point counting procedure is as follows: an ocular reticule (cross hair or point array) is used to visually superimpose a point or points on the microscope field of view. A total of 400 points superimposed on either asbestos fibers or non-asbestos matrix material must be counted over at least eight different preparations of representative sub-samples. If an asbestos fiber and matrix particle overlap so that a point is superimposed on their visual intersection, a point is scored for both categories. Point counting provides a quantification of the area percent asbestos. Per EPA's regulations, materials which have been point-counted and, therefore, quantitatively determined to have less than or equal to one percent (≤1%) asbestos, can be treated as non-ACM. **No samples were point counted during this survey.**

4.0 REGULATORY OVERVIEW

4.1 Asbestos Regulations

The asbestos NESHAP (40 CFR Part 61, Subpart M) regulates asbestos fiber emissions and asbestos waste disposal practices. It also requires the identification and classification of existing building materials prior to demolition or renovation activity. Under NESHAP, asbestos-containing building materials are classified as either friable, Category I non-friable or Category II non-friable ACM. Friable materials are those that, when dry, may be crumbled, pulverized or reduced to powder by hand pressure. Category I non-friable ACM includes packings, gaskets, resilient floor coverings and asphalt roofing products containing more than 1% asbestos. Category II non-friable ACM are any materials other than Category I materials that contain more than 1% asbestos.

Friable ACM, Category I and Category II non-friable ACM which are in poor condition and has become friable or which will be subjected to drilling, sanding, grinding, cutting or abrading and which could be crushed or pulverized during anticipated renovation or demolition activities are considered regulated ACM (RACM).

In the State of Florida, asbestos activities are regulated by the Florida Department of Environmental Protection (FDEP). RACM must be removed prior to demolition activities which will disturb the materials. The owner or operator must provide the FDEP with written notification of planned removal activities at least 10 working days prior to the commencement of asbestos abatement activities. Removal of RACM must be conducted by a State of Florida licensed asbestos abatement contractor.

The OSHA Asbestos standard for construction (29 CFR 1926.1101) regulates workplace exposure to asbestos. The OSHA standard requires that employee exposure to airborne asbestos fibers be maintained below 0.1 asbestos fibers per cubic centimeter of air (0.1 f/cc). The OSHA standard classifies construction and maintenance activities which could disturb ACM, and specifies work practices and precautions which employers must follow when engaging in each class of regulated work.

4.2 Metals Based Protective Coatings and Lead Based Paint Regulations

Cadmium, chromium, zinc and lead have historically been used in paints and coating. Specific regulations regarding lead based paints have been developed by the USEPA. Lead-based paint is defined as a surface coating or paint containing lead in excess of 1.0 milligram per square centimeter (mg/cm^2) or 0.5% by weight (USEPA Toxic Substance Control Act, Section 401). 0.5% is equivalent to 5000 parts per million (ppm). Based on regulations contained in the Lead-Based Paint Poisoning Prevention Act (LBPPPA) and promulgated by the Consumer Product Safety Commission (CPSC), lead-based paint is defined as paint containing more than 0.06% lead as of June 1977. In 1978, the CPSC banned the sale of lead-based paint to consumers.

Under EPA regulations lead, chromium and cadmium impacted wastes generated during abatement activities are handled as either a solid waste or a hazardous waste, depending on the amount and form of each of the heavy metals. If the maximum level of the metal in an extract of a representative sample of the waste stream proposed for disposal, as determined by

a Toxicity Characteristic Leaching Procedure (TCLP) laboratory analysis, is less than the regulatory level set in 40 CFR 261.24, then EPA regulations allow the material to be disposed of as solid waste at a solid waste landfill. If the TCLP analysis equals or exceeds the regulatory level, the material must be managed as a hazardous waste. The regulatory levels for cadmium, chromium and lead are 1.0, 5.0 and 5.0 milligram per liter (mg/L), respectively. Impacted materials that are recycled, such as painted steel beams sent to a scrap metal yard, are not considered waste; therefore, they are exempt from waste disposal regulations; however, other occupational and recycling regulations may apply.

The OSHA established the Lead Standard for the Construction Industry, 29 CFR 1926.62, which applies to all construction work where an employee may be exposed to lead. These exposures include demolition and salvage of structures where lead or material containing lead are present and removal or encapsulation of materials containing lead, as well as alterations and repairs including painting and decorating. The standard defines the occupationally permissible exposure limit and specific requirements for construction work with and in lead materials. OSHA does not have a percentage lead in paint action level in their current construction lead standard. OSHA considers the lead regulation enforceable if the presence of *any* lead in paint at detectable concentrations is present when demolition or renovation activities are performed. Any abatement of the lead-based paint or cutting, sanding, and/or grinding of the structures painted with lead based paint (LBP) should be performed in accordance with OSHA regulations.

Demolition activities are regulated under the NESHAP statue for general dust control. Specifications for the proper work practices, controls and disposal should be developed to document compliance with all applicable regulations.

5.0 FINDINGS AND RECOMMENDATIONS

5.1 Asbestos

Seventeen (17) bulk samples were collected from five (5) homogeneous areas of suspect ACM. A summary of suspect ACM is provided in the following table, along with the results from the laboratory. The analytical results are included in **Appendix A**.

Table 1: Summary of ACM
Hernando DeSoto Bridge - FDOT Structure No. 130053

Homo. No.	Sample No.	Material Description	Approx. Quantity	Lab Results % Asbestos	NESHAP Category
A	1 2 3	Residual tar paper strips on underside of decking from construction form joints	Not Measured	<1% Chrysotile	N/A
B	4 5 6	Tar paper at end bents between bridge decking	500 ft^2	1.5% Chrysotile	RACM
C	7 8 9	Black expansion joint filler	Not Measured	Not Detected	N/A
D	10 11 12	Adhesive for reflectors	Not Measured	Not Detected	N/A
E	13 14 15 17	Concrete from deck, piles and caps	Not Measured	Not Detected	N/A

One of the seventeen (17) samples tested had asbestos mineral fibers at levels greater than 1 percent. The black tar paper located between the end bents and the bridge decking contained 1.5% chrysotile asbestos. The material was observed to be friable and thus when disturbed as a result of renovations or demolitions would be classified as RACM per NESHAP. The tar paper was not readily observed on intermediate bent caps; however, visual inspection of these areas were limited due to access.

Additionally, residual tar paper strips, approximately 2 inches in width and of various lengths (typically several feet long), were observed on the underside of the decking. These residual strips were found to contain less 1% chrysotile asbestos. The strips were presumably used to tape cracks in the plywood deck forms at the joints where the sheets abutted and remained adhered to the concrete after the removal of the forms. This material is not ACM per EPA since it is below the 1% threshold.

It should be noted that suspect materials, other than those identified during the survey could exist within the structure in areas not accessible to the inspector at the time of the survey. Should suspect materials other than those which were identified during this survey be uncovered during the renovation/demolition process, those materials should be assumed to be ACM until sampling and analysis can confirm or refute their asbestos content.

5.2 Protective Coating/Lead Based Paint

The steel bearing plates at the bridge we observed to be painted. One (1) composite sample of paint was analyzed to determine the content of select heavy metals historically used in paints. The sample was analyzed for lead, cadmium, chromium and zinc. The paint did not contain lead in a quantity to meet EPA's definition of Lead Based Paint (LBP). A summary of the results are provided in the table below.

Table 2: Grab Sample Total Metals

Sample No.	Location	Lead mg/kg	Cadmium mg/kg	Chromium mg/kg	Zinc mg/kg
1	Silver paint on bearing plate	399	25.3	69.5	4,710

Based on the results for the total concentration of the metals, it does not appear that the coating materials would be classified as a hazardous waste per 40 CFR 261. This is dependent on whether the paint is removed as a separate paint waste or in combination with the bearing plates. Recycling the bearing plates as a whole, likely offers the best solution since recycled metals are generally exempt for the 40 CFR 261 requirements since they are not considered a "Solid Waste" but rather a recycled material. Prior to disposal of any waste paint materials, a TCLP analysis of the waste should be performed to make a final determination.

6.0 GENERAL COMMENTS

This survey was conducted in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions in the same locale, with the limitation noted above. The results, findings, conclusions and recommendations expressed in this report are based on conditions observed during our survey of the subject bridge structure. The information contained in this report is relevant to the date on which this survey was performed, and should not be relied upon to represent conditions at a later date. Tierra does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report. No warranty, express or implied, is made.

APPENDIX A

Laboratory Results

DOVE ENVIRONMENTAL CORP.
8910 MIRAMAR PARKWAY, SUITE 200 MIRAMAR FL 33025
Tel. (954) 374-9274 Fax: (954) 639-7426

ASBESTOS TEST REPORT

CLIENT : TIERRA CONSULTING GROUP, INC.
ADDRESS: 7351 TEMPLE TERRACE HIGHWAY
TAMPA FL 33637
PROJECT: BRIDGE STRUCTURE # 130053
MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 1
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO. : 01
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: <1% CHRYSOTILE
OTHER FIBERS : 29.5% CELLULOSE
NON FIBERS : 10% MINERALS

SAMPLE NO.: A1
DATE OF ANALYSIS: 07/14/11
60% BITUMEN

LAB NO. : 02
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: <1% CHRYSOTILE
OTHER FIBERS : 29.5% CELLULOSE
NON FIBERS : 10% MINERALS

SAMPLE NO.: A2
DATE OF ANALYSIS: 07/14/11
60% BITUMEN

LAB NO. : 03
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: <1% CHRYSOTILE
OTHER FIBERS : 29.5% CELLULOSE
NON FIBERS : 10% MINERALS

SAMPLE NO.: A3
DATE OF ANALYSIS: 07/14/11
60% BITUMEN

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Analyst 1

Rajendranath Ramnath
LABORATORY MANAGER

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8910 MIRAMAR PARKWAY, SUITE 200 MIRAMAR FL 33025
Tel. (954) 374-9274 Fax: (954) 639-7426

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TAMPA FL 33637
PROJECT: BRIDGE STRUCTURE # 130053
MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 2
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO. : 04
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: 1.5 % CHRYSOTILE
OTHER FIBERS : 20% CELLULOSE
NON FIBERS : 20% MINERALS
SAMPLE NO.: B1
DATE OF ANALYSIS: 07/14/11
58.5% BITUMEN

LAB NO. : 05
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: 1.5 % CHRYSOTILE
OTHER FIBERS : 20% CELLULOSE
NON FIBERS : 20% MINERALS
SAMPLE NO.: B2
DATE OF ANALYSIS: 07/14/11
58.5% BITUMEN

LAB NO. : 06
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: 1.5 % CHRYSOTILE
OTHER FIBERS : 20% CELLULOSE
NON FIBERS : 20% MINERALS
SAMPLE NO.: B3
DATE OF ANALYSIS: 07/14/11
58.5% BITUMEN

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MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 3
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO. : 07
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : JOINT FILLER
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 10% CELLULOSE
NON FIBERS : 10% MINERALS

SAMPLE NO.: C1
DATE OF ANALYSIS: 07/14/11
80% BITUMEN

LAB NO. : 08
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : JOINT FILLER
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 10% CELLULOSE
NON FIBERS : 10% MINERALS

SAMPLE NO.: C2
DATE OF ANALYSIS: 07/14/11
80% BITUMEN

LAB NO. : 09
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : JOINT FILLER
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 10% CELLULOSE
NON FIBERS : 10% MINERALS

SAMPLE NO.: C3
DATE OF ANALYSIS: 07/14/11
80% BITUMEN

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PROJECT: BRIDGE STRUCTURE # 130053
MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 4

DATE : 07/14/11
SAMPLE ID : D107448

NVLAP Lab Code: 102053-0

LAB NO. : 10
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : REFLECTOR ADHENSIVE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 10% MINERALS
20% POLYMERS

SAMPLE NO.: D1
DATE OF ANALYSIS: 07/14/11

65% BITUMEN

LAB NO. : 11
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : REFLECTOR ADHENSIVE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 10% MINERALS
20% POLYMERS

SAMPLE NO.: D2
DATE OF ANALYSIS: 07/14/11

65% BITUMEN

LAB NO. : 12
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : REFLECTOR ADHENSIVE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 10% MINERALS
20% POLYMERS

SAMPLE NO.: D3
DATE OF ANALYSIS: 07/14/11

65% BITUMEN

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MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 5
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO.	: 13		SAMPLE NO.: E1
FRI/HOM	: NO/YES	LAYERS: 01	DATE OF ANALYSIS: 07/14/11
DESCRIPTION	: CONCRETE		
ASBESTOS TYPE:	NONE-DETECTED		
OTHER FIBERS	: 5% CELLULOSE		
NON FIBERS	: 65% MINERALS		30% POLYMERS

LAB NO.	: 14		SAMPLE NO.: E2
FRI/HOM	: NO/YES	LAYERS: 01	DATE OF ANALYSIS: 07/14/11
DESCRIPTION	: CONCRETE		
ASBESTOS TYPE:	NONE-DETECTED		
OTHER FIBERS	: 5% CELLULOSE		
NON FIBERS	: 65% MINERALS		30% POLYMERS

LAB NO.	: 15		SAMPLE NO.: E3
FRI/HOM	: NO/YES	LAYERS: 01	DATE OF ANALYSIS: 07/14/11
DESCRIPTION	: CONCRETE		
ASBESTOS TYPE:	NONE-DETECTED		
OTHER FIBERS	: 5% CELLULOSE		
NON FIBERS	: 65% MINERALS		30% POLYMERS

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PROJECT: BRIDGE STRUCTURE # 130053
MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 6
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO. : 16
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : CONCRETE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 65% MINERALS

SAMPLE NO.: E4
DATE OF ANALYSIS: 07/14/11
30% POLYMERS

LAB NO. : 17
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : CONCRETE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 65% MINERALS

SAMPLE NO.: E5
DATE OF ANALYSIS: 07/14/11
30% POLYMERS

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DOVE ENVIRONMENTAL LABORATORIES
4715 NW 157th ST.
SUITE 203
MIAMI, FL 33014
(305) 620-6050 Tel (305) 620-6350 Fax
E-mail : dovelabs@bellsouth.net

US 41 Bridge over Manatee River
STRUCTURE 130053

#361

CHAIN OF CUSTODY – BULK ASBESTOS

Client Name : Tierra Inc
Address : 7351 Temple Terrace Tampa FL
Project Name : Bridge Structure # 130053

Date : 7/13/2011
Lab ID : D D107498
Total Samples Collected : _____
Project # : _____

Sample #	Description	Location	Results
A1-A3	Tar Paper	Miscellaneous Seams	
B1-B3	Tar Paper	End Bents	
C1-C3	Joint filler		
D1-D3	Reflector Adhesive	Centerline	
E1-E5	Concrete	Miscellaneous	

Project Location : Manatee County

Sampler's Name : Scott Crandall
Sampler's Signature :
Received at Lab :
Conditions Sample was received :

Date Collected : 7/13/2011
Turn Around (hrs) : 8 [] 24[] 48[] other [] STANDARD
Date received : 07/14/11 @ 8:37AM
Comments

Form : Chainofcustody.asbestos

SPECTRUM ANALYTICAL, INC
Featuring
HANIBAL TECHNOLOGY
Florida Division

Florida	# E84207	California	# 07253CA
Texas	# T104704408-11-3	Louisiana	# 02025
South Carolina	# 96011001	Kansas	# E-10385
North Dakota	# R-178	Arkansas	# 11-036-1

- CERTIFICATE OF ANALYSIS -

Report Date: 07/26/2011

To: Scott Crandall
Scott Crandall
204 37th Ave North
St Petersburg, FL 33704

Work 813-335-5341
FAX

PROJECT ID: US 41 Bridge Over Manatee Riv
WORK ORDER: 3503559 Revised Report
DATE RECEIVED: Monday, July 18, 2011

Project Notes: Report revised to remove Ca and report Cd per client.

(†): Short Hold Time Analysis Date

Samples reported on dry weight basis
All test results in this report pertain only to the samples as submitted.

Spectrum Analytical, Inc. FL Division Contact: Mark Gudnason / extension: 242
8405 Benjamin Road, Suite A• Tampa, Florida 33634
813-888-9507• FAX: 813-889-7128
Website: www.pelab.com

Spectrum Analytical, Inc. FL Division
featuring Hanibal Technology

DATA QUALIFIER CODES

State of Florida, Department of Environmental Protection and
Department of Health Rehabilitative Services / NELAC

I The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

J Estimated value; value not accurate. This code shall be used in the following instances:

1. Surrogate recovery limits have been exceeded.
2. No known quality control criteria exits for the component.
3. The reported value did not meet the established quality control criteria for either precision or accuracy but falls within the NELAC marginal exceedance range.

3M. The reported value did not meet the established quality control criteria for either precision or accuracy and falls beyond the NELAC range for marginal exceedances.

3R. The RPD for the LCSD exceeds the laboratory established control limits.

4. The sample matrix interfered with the ability to make an accurate determination.
5. The data is questionable because of improper laboratory or field protocols (e.g. composite sample was collected instead of a grab sample).

L Off-scale high. Actual value is known to be greater than the value given. To be used when the concentration of the analyte is above the acceptable limit for quantitation (exceeds the linear range of the highest calibration standard) and the calibration curve is known to exhibit a negative deflection.

Q Sample held beyond acceptable holding time. This code shall be used if the value is derived from a sample that was prepared or analyzed after the approved holding time restrictions for the sample preparation or analysis.

U Indicates that the compound was analyzed for but not detected above the method detection limit (MDL).

V Indicates that the analyte was detected in both the sample and the associated method blank. Note: The value in the blank shall not be subtracted from associated samples.

Y The laboratory analysis was from an unpreserved or improperly preserved sample. The data may not be accurate.

RL - Reporing Limit. The PEL lowest Practical Quanititation Limit (PQL), defined by the lowest point in the calibration curve.

CASE NARRATIVE
METALS

Spectrum Analytical Inc. Lab Reference No./SDG: 3503559

Client: Crandall

I. RECEIPT

Exceptions encountered upon receipt are addressed in the Sample Receipt Confirmation Report, included with the Chain-of-Custody documentation, or communication included in the addendum with this package.

II. HOLDING TIMES

A. Sample Preparation: All holding times were met.

B. Sample Analysis: All holding times were met.

III. METHOD

Analyses were performed according to the Spectrum Analytical Inc. Standard Operating Procedures and EPA Method 6010B for ICP metals.

IV. PREPARATION

Soil samples were prepared according to PEL Laboratory's Standard Operating Procedures and EPA Method 3050B.

V. ANALYSIS

A. Calibration:

All acceptance criteria were met.

B. Blanks:

1. Calibration Blanks:

All acceptance criteria were met.

2. Method Blanks:

All acceptance criteria were met.

C. Spikes:

1. Laboratory Control Spikes (LCS):

An LCS/LCSD set was analyzed.
All percent recovery and relative percent difference (RPD) criteria were met.

2. Post Digestion Spike:

All acceptance criteria were met with the exception of:

CASE NARRATIVE
METALS

Spectrum Analytical Inc. Lab Reference No./SDG: 3503559

Client: Crandall

Post Digestion Spike 350355901A was analyzed with the soil samples on 07/20/11. The following analyte(s) were recovered below criteria: Lead at 43.6 % with criteria of (80-120). The most probable cause for the PDS exceeding limits is sample matrix due to the fact that the LCS/LCSD pass all quality control criteria. No further action was taken.

3. **Matrix Spike/Matrix Spike Duplicate Samples (MS/SD):**

No spikes requested by client.

D. Duplicate:

No sample duplicates are reported with this method. (Spike duplicates are referenced above in section C. Spikes.)

E. Serial Dilution:

All acceptance criteria were met.

F. ICP Interference Check Samples:

All acceptance criteria were met.

G. Samples:

Sample analysis proceeded normally.
Sample Sample 1 required a 25X dilution due to high concentration of the following analyte(s): Zinc.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and Spectrum Analytical Inc., both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as, verified by the following signature.

Signature:

Name: Troy L. Roberts Title: Inorg. Manager

SIGNED: **DATE:** 07/25/2011

- CERTIFICATE OF ANALYSIS -

FLDOH #E84207

To: Scott Crandall
Scott Crandall

WORK ORDER: 3503559
PROJECT ID: US 41 Bridge Over Manatee Riv

Lab# : 350355901
Client ID : Sample 1
Matrix : S

Collection Information:
Sample Date: 7/13/2011

Parameter	Method	Results	Analysis Date	Prep Date	Units	MDL	RL	Dilution Factor
Cadmium	6010	**25.3**	07/20/2011 14:00	07/19/2011 12:15	MG/KG	0.0512	0.512	1
Chromium	6010	**69.5**	07/20/2011 14:00	07/19/2011 12:15	MG/KG	0.164	0.512	1
Lead	6010	**399**	07/20/2011 14:00	07/19/2011 12:15	MG/KG	0.348	0.82	1
Zinc	6010	**4710**	07/22/2011 11:55	07/19/2011 12:15	MG/KG	8.45	25.6	25

- CERTIFICATE OF ANALYSIS -

FLDOH #E84207

To: Scott Crandall
Scott Crandall

WORK ORDER: 3503559
PROJECT ID: US 41 Bridge Over Manatee Riv

QC SUMMARY

METHOD: 6010

Method Blank : 93294MB **Matrix :** SQ

Associated Lab Samples : 350355901 350355901DL1 93294MB 93295LCS 93296LCSD

Parameter	Results	Analysis Date	Prep Date	Units	RL	Dilution Factor
Cadmium	U	7/22/2011	7/19/2011	MG/KG	0.0493	1
Chromium	U	7/22/2011	7/19/2011	MG/KG	0.158	1
Lead	U	7/22/2011	7/19/2011	MG/KG	0.335	1
Zinc	U	7/22/2011	7/19/2011	MG/KG	0.325	1

LABORATORY CONTROL SAMPLE: 93295LCS **Matrix :** SQ

PARAMETER	UNITS	SPIKE CONC	LCS RESULT	SPIKE % REC	% REC LIMITS	RPD	RPD LIMIT
Cadmium	mg/Kg	49.6	47.8	96.4	(80-120)		
Chromium	mg/Kg	49.6	48.8	98.4	(80-120)		
Lead	mg/Kg	49.6	48.4	97.6	(80-120)		
Zinc	mg/Kg	49.6	47.9	96.6	(80-120)		

LABORATORY CONTROL SAMPLE: 93296LCSD **Matrix :** SQ

PARAMETER	UNITS	SPIKE CONC	LCS RESULT	SPIKE % REC	% REC LIMITS	RPD	RPD LIMIT
Cadmium	mg/Kg	49.5	49	99	(80-120)	2.5	20
Chromium	mg/Kg	49.5	50.2	101.4	(80-120)	2.8	20
Lead	mg/Kg	49.5	49.4	99.8	(80-120)	2	20
Zinc	mg/Kg	49.5	49.5	100	(80-120)	3.3	20

- CERTIFICATE OF ANALYSIS -

FLDOH #E84207

To: Scott Crandall
Scott Crandall

WORK ORDER: 3503559
PROJECT ID: US 41 Bridge Over Manatee Riv

Brian C. Spann Laboratory Manager
or
Mark Gudnason Technical Director

CHAIN OF CUSTODY RECORD

3503559

Page 1 of 1

Special Handling:
TAT- Indicate Date Needed: _____
- All TATs subject to laboratory approval. Min. 24-hour notification needed for rushes.
- Samples disposed of after 60 days unless otherwise instructed.

Report To: Tierra Inc
7351 Temple Terrace Hwy
Tampa FL 33637

Project Mgr.: Scrandall

Invoice To: SAME

P.O. No.: _____ RQN: _____

Project No.: 6512-11-011
Site Name: US 41 Bridge over Manatee R.
Location: Manatee Cty State: FL
Sampler(s): Scrandall

1=$Na_2S_2O_3$ 2=HCl 3=H_2SO_4 4=HNO_3 5=NaOH 6=Ascorbic Acid 7=CH_3OH
8= $NaHSO_4$ 9=_____ 10=_____ 11=_____

List preservative code below:

Notes:

DW=Drinking Water GW=Groundwater WW=Wastewater
O=Oil SW= Surface Water SO=Soil SL=Sludge A=Air
X1=_____ X2=_____ X3=_____

G=Grab C=Composite

Lab Id:	Sample Id:	Date:	Time:	Type	Matrix	Containers: # of VOA Vials	# of Amber Glass	# of Clear Glass	# of Plastic	Analyses: Bassle 1 Zn Pb Cd	QA/QC Reporting Level
-01	Sample 1	7/15/11			S					✓	

QA/QC Reporting Level
☐ Level I ☐ Level II
☐ Level III ☐ Level IV
☐ Other _____
State specific reporting standards: _____

☐ E-mail to scrandall@tierrainc.com data processing
EDD Format _____

Relinquished by: _____

Received by: _____

Date: 7/18/11 Time: 0830

Condition upon receipt: ☐ Iced ☒ Ambient ☐ °C _____

8405 Benjamin Road • Tampa, Florida 33634 • 813-888-9507 • FAX 813-889-7128 • www.pelab.com

SAMPLE RECEIPT CONFIRMATION SHEET

Client Information

SDG:	3503559	Req:	90612
Client:	Crandall	Project:	Generic
Level:	1	Date Rec'd:	7/18/2011 8:30:00 AM
Rec'd via:	Courier	Due Date:	7/25/2011

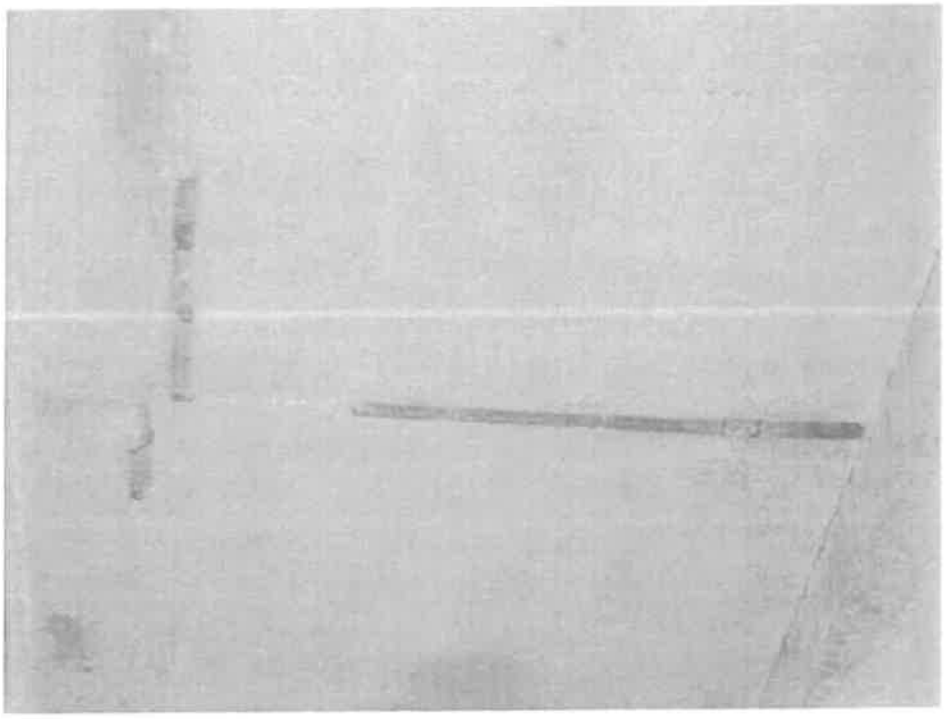
Sample Verification

Samples/Cooler Secure?	Yes	All Samples on COC accounted For?	Yes
Temperature of Samples(Celsius)	ambient	All Samples Rec'd Intact?	Yes
pH Verified?	No	Sample Vol. Sufficient For Analysis	Yes
pH WNL?	No	Samples Rec'd W/I Hold Time?	Yes
Soil Origin (Domestic/Foreign):	Domestic	Are All Samples to be Analyzed?	Yes
Site Location/Project on COC?	Yes	Correct Sample Containers?	Yes
Client Project # on COC?	Yes	COC Comments written on COC?	Yes
Project Mgr. Indicated on COC?	Yes	Samplers Initials on COC?	Yes
COC relinquished/Dated by Client?	Yes	Sample Date/Time Indicated?	Yes
COC Received/Dated by PEL?	Yes	TAT Requested:	STD
Specific Subcontract Indicated?	No	Client Requests Verbal Results?	No
Samples Received By	Courier	Client Requests Faxed Results?	No
PEL to Conduct ALL Analyses?	Yes		
Radioactivity Check?	No		
COC Present?	Yes		

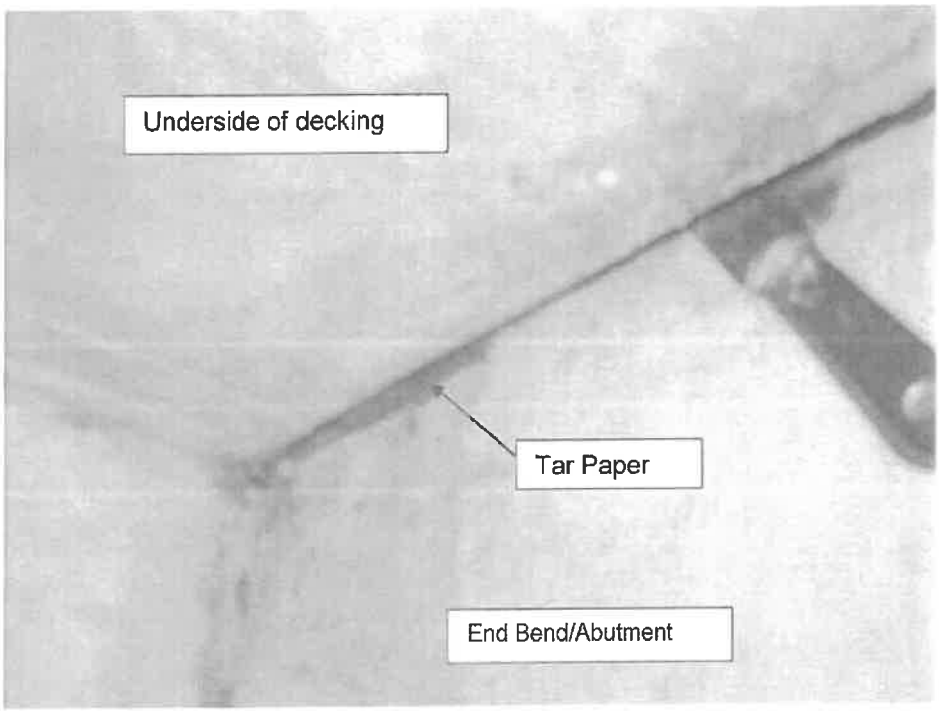
PEER REVIEW:

APPENDIX B

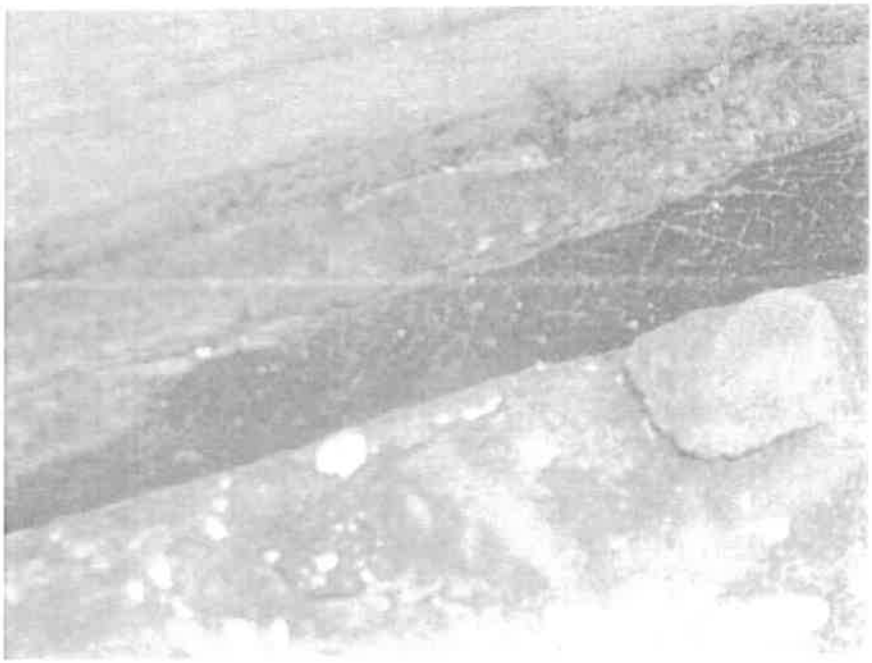
Photograph Log



Homogeneous Material A – Residual tar paper



Homogenous Material B – Black tar paper between decking and end bent



Homogeneous Material C – Poured joint filler at expansion joints on decking



Homogeneous Material D – Adhesive for reflectors



Homogeneous Material E – Various concrete elements

APPENDIX C

Personnel Training Certificates

Vern Roberts Environmental Training, Inc.

13987 94th Avenue N Seminole, FL 33776

727-593-3067

Asbestos Contractor Supervisor Refresher Training

This is to Certify that

Scott Crandall

Training was in accordance with Title II of TSCA, 40 CFR Part 763. Appendix C to Subpart E as revised

Date of Examination 10/8/10

Date of Course: 10/8/10 Expiration Date 10/8/11

Certificate # 10081004 CM Points: 1.0

Course # FL490006321 Provider # FL426003810

Instructor

Vern Roberts Environmental Training, Inc.

13987 94th Avenue N Seminole, FL 33776

727-593-3067

Asbestos Project Designer Refresher Training

This is to Certify that

Scott Crandall

Training was in accordance with Title II of TSCA, 40 CFR Part 763. Appendix C to Subpart E as revised

Date of Examination 10/11/10

Date of Course: 10/11/10 Expiration Date 10/11/11

Certificate # 10111003 CM Points: 0.5

Course #FL0490006324 Provider #FL0490003810

Instructor

Vern Roberts Environmental Training, Inc.

13987 94th Avenue N Seminole, FL 33776

727-593-3067

Asbestos Management Planner Training

This is to Certify that

Scott Crandall

Has completed the requisite training for asbestos accreditation under TSCA TITLE 11

Date of Examination 10/9/10

Date of Course: 10/9/10 Expiration Date 10/9/11

Certificate # 100904

Course # FL49-000636323 , Provider # FL49-0003810

Instructor

Vern Roberts Environmental Training, Inc.

13987 94th Avenue N Seminole, FL 33776

727-593-3067

Asbestos Survey & Mechanical (Inspector) Refresher Training

This is to certify that

Scott Crandall

Training was in accordance with Title II of TSCA, 40 CFR Part 763. Appendix C to Subpart E as revised

Date of Examination 10/9/10

Date of Course: 10/9/10 Expiration Date 10/9/11

Certificate # 10091004 CM Points: 0.5

Course # FL490006322 Provider # FL490003810

Instructor

AC# 5330327

STATE OF FLORIDA

DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION
ASBESTOS LICENSING UNIT

SEQ# L10110401182

DATE	BATCH NUMBER	LICENSE NBR
11/04/2010	108106588	EA0000060

The ASBESTOS CONSULTANT - ENGINEER
Named below IS LICENSED
Under the provisions of Chapter 469 FS.
Expiration date: NOV 30, 2012

CRANDALL, SCOTT S
DIVERSIFIED PROFESSIONAL SERVICES CORP
3600 10TH ST NE
ST PETERSBURG FL 33704

CHARLIE CRIST
GOVERNOR

CHARLIE LIEM
SECRETARY

DISPLAY AS REQUIRED BY LAW

AC# 4715802

STATE OF FLORIDA

DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION
ASBESTOS LICENSING UNIT

SEQ# L09111001177

DATE	BATCH NUMBER	LICENSE NBR
11/10/2009	090150982	ZA405

The ASBESTOS BUSINESS ORGANIZATION
Named below IS LICENSED
Under the provisions of Chapter 469 FS.
Expiration date: NOV 30, 2011

TIERRA INC
SCOTT S CRANDALL
7351 TEMPLE TERRACE HWY
TAMPA FL 33637

CHARLIE CRIST
GOVERNOR

CHARLES W. DRAGO
SECRETARY

DISPLAY AS REQUIRED BY LAW

TIERRA

July 25, 2011

HNTB Corporation
10210 Highland Manor Drive, Suite 140
Tampa, Florida 33610

Attn: Douglas Burkhart, PE
Project Manager

RE: NESHAP Asbestos and Protective Coatings Survey Report
Hernando DeSoto Bridge (FDOT Structure No. 130053)
US 41/US 301 (Tamiami Trail/1st St. E.) Bridge over the Manatee River
Manatee County, Florida
FPN: 425033-1-22-01
Work Assignment No: 027
Tierra Project No.: 6512-11-011

Mr. Burkhart:

The purpose of this report is to present the results of an asbestos survey and protective coating survey performed on July 13, 2011, at the above referenced project. We understand that this survey was requested due to the planned renovation and/or demolition of the structure.

Regulated Asbestos Containing Materials (RACM) were identified at the site. Please refer to the attached report for details.

Tierra appreciates the opportunity to provide this service to HNTB. If you have any questions regarding this report, please contact our office at your earliest convenience.

Respectfully Submitted,

TIERRA INC.



cn=Scott Crandall, o, ou,
email=scrandall@quantum
dataprocessing.com, c=US
2011.07.27 08:29:18 -04'00'

Scott S. Crandall, P.E.
Florida Licensed Asbestos Consultant
License No. EA0000060

Donald R. Polanis, CGC
Environmental Scientist

7351 Temple Terrace Highway • Tampa, Florida 33637 • (813)989-1354 • Fax (813)989-1355

ASBESTOS AND PROTECTIVE COATING SURVEY REPORT

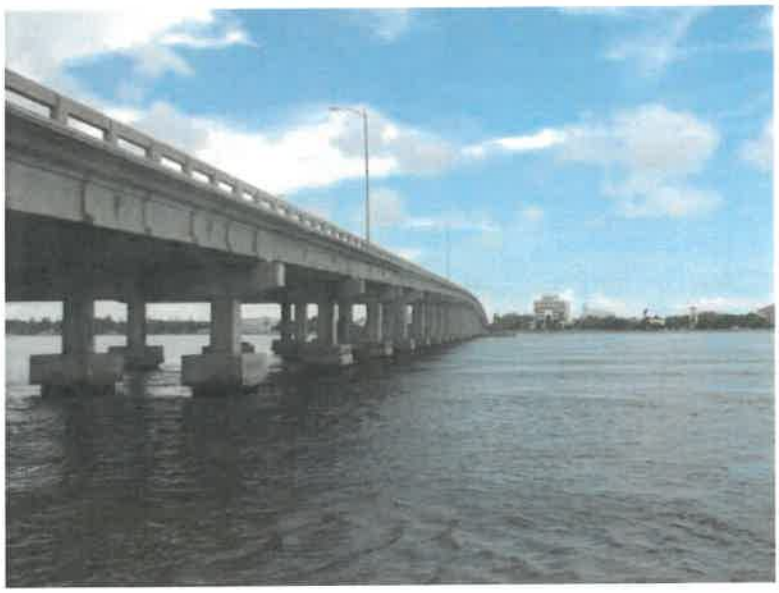
Hernando DeSoto Bridge
FDOT Structure No. 130053

US 41/US 301 (Tamiami Trail/1st St. E.) Bridge over the Manatee River
Manatee County, Florida

FPID: 425033-1-22-01

Tierra Project No.: 6512-11-011

July 2011



Prepared for:

HNTB Corporation
10210 Highland Manor Drive, Suite 140
Tampa, Florida 33610

Prepared by:

Tierra, Inc.
7351 Temple Terrace Highway
Tampa Florida 33637

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EXECUTIVE SUMMARY

Tierra, Inc. (Tierra) conducted an asbestos and protective coating survey of the Hernando Desoto Bridge, which crosses the Manatee River. The structure is located on US 41, in Manatee County, Florida. The bridge is identified as FDOT Structure Number 130053. It is our understanding that the FDOT is planning to renovate and/or demolish the bridge structure. The purpose of this survey was to identify and sample suspect asbestos-containing materials (ACM) and heavy metals based protective coatings to provide information regarding the identity, location, condition and approximate quantities of these materials so that proper remediation and disposal methods can be evaluated.

The survey was conducted on July 13, 2011 by an Asbestos Hazard Emergency Response Act (AHERA) accredited inspector in general accordance with the sampling protocols established in Environmental Protection Agency (EPA) 40 Code of Federal Regulations (CFR) 763. Seventeen (17) bulk samples were collected from five (5) homogeneous areas of suspect ACM. Chrysotile asbestos was identified at 1.5% in the felt paper located between the end bents and the bridge decking. This material was determined to be friable and classified as Regulated Asbestos Containing Material (RACM) per National Emission Standards for Hazardous Air Pollutants (NESHAP). Additionally, residual felt paper strips, observed on the underside of the decking, were found to contain less 1% chrysotile asbestos. The strips were presumably used to tape cracks in the deck forms and remained adhered to the concrete after the removal of the forms.

Steel bearing plates at the bridge we observed to be painted. The paint did not contain lead in a quantity to meet EPA's definition of Lead Based Paint (LBP).

1.0 INTRODUCTION

Tierra, Inc. (Tierra) conducted an asbestos and protective coating survey of the Hernando Desoto Bridge, which crosses the Manatee River. The structure is located on US 41, in Manatee County, Florida. The bridge is identified as FDOT Structure Number 130053. The survey was conducted on July 13, 2011 by an Asbestos Hazard Emergency Response Act (AHERA) accredited asbestos inspector. Suspect asbestos-containing material (ACM) samples were collected in general accordance with the sampling protocols outlined in EPA regulation 40 CFR 763. Samples were delivered to an accredited laboratory for analysis by polarized light microscopy.

1.1 Project Objective

We understand this asbestos survey was requested due to the planned renovation and/or demolition of the existing bridge structure. EPA regulation 40 CFR 61, Subpart M, National Emission Standards for Hazardous Air Pollutants (NESHAP), prohibits the release of asbestos fibers and other hazardous air pollutants to the atmosphere during renovation or demolition activities. The asbestos NESHAP requires that potentially regulated asbestos-containing building materials be identified, classified and quantified prior to planned disturbances or demolition activities. No previous reports or design plans were provided.

2.0 BRIDGE DESCRIPTION

The date for the construction of the bridge is unknown. The bridge is a cast in place, concrete beam, raised span bridge, consisting of four (4) lanes, two lanes servicing north and south bound traffic. It is approximately 2,250 feet in length and 60 feet in width. It is constructed on driven concrete piles with concrete piers and bent caps supporting concrete beams and a cast in place concrete bridge deck. Both sides are lined with concrete curbing and concrete guardrails. Guardrails at the approaches are galvanized "W" channel steel on wood posts.

3.0 FIELD ACTIVITIES

The survey was conducted by Mr. Scott Crandall, PE, an AHERA-accredited asbestos inspector. A copy of Mr. Crandall's asbestos inspector certificate is presented in **Appendix C**. The survey was conducted in general accordance with the sample collection protocols established in EPA regulation 40 CFR 763, the AHERA. A summary of the survey activities performed is provided below. The survey was limited to areas accessible by foot and included the bridge surface and underneath the structure at both end of the bridge.

3.1 Visual Assessment

Our survey activities began with visual observation of the structure to identify homogeneous areas of suspect ACM and painted coatings. A homogeneous material consists of building materials that appear similar throughout in terms of color, texture and date of application. Building materials identified as steel, concrete, glass, wood, masonry, metal or rubber were not considered suspect ACM. If surfaces are painted and/or otherwise covered with protective coating those materials are noted and sampled.

3.2 Physical Assessment

A physical assessment of each homogeneous area of suspect ACM was conducted to assess the friability and condition of the materials. A friable material is defined by the EPA as a material which can be crumbled, pulverized or reduced to powder by hand pressure when dry. Friability was assessed by physically touching suspect materials.

3.3 Sample Collection

Based on results of the visual observation, bulk samples of suspect ACM and protective coatings were collected in general accordance with AHERA sampling protocols. Representative samples of suspect materials were collected in each homogeneous area. Tierra personnel collected bulk samples using wet methods as applicable to reduce the potential for fiber release. Samples were placed in sealable containers and labeled with unique sample numbers using an indelible marker.

Seventeen (17) bulk samples were collected from five (5) homogeneous materials of suspect ACM. A summary of suspect ACM samples collected during the survey is included in Section 5.0.

A visual inspection of the structure for protective coatings and painted surfaces indicated the steel bearing plates were painted. One (1) sample of the paint was collected for heavy metals analysis.

3.4 Sample Analysis

Bulk samples of ACM were submitted under chain of custody to Dove Environmental Corporation (Dove) of Miami, Florida for analysis by polarized light microscopy with dispersion staining techniques per EPA methodology (40 CFR 763, Subpart F). The percentage of asbestos, where applicable, was determined by microscopic visual estimation. Dove is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP Accreditation No. 102053-0).

The U.S. Environmental Protection Agency (USEPA) and the Occupational Safety and Health Administration (OSHA) define asbestos containing material (ACM) as any material which contains greater than one percent asbestos. When samples analyzed by Polarized Light Microscopy contain asbestos in amounts less than ten percent (< 10%), a more exact method of analysis called point counting may be performed at the client's request. The EPA point count method allows a sample in which asbestos was visually detected, but which is visually estimated to have 10% or less asbestos, to be quantified using a point count procedure. If not point counted, a sample in which asbestos was visually detected and estimated (including trace to ≤1%) must be assumed to be greater than 1% and treated as an ACM. The EPA point counting procedure is as follows: an ocular reticule (cross hair or point array) is used to visually superimpose a point or points on the microscope field of view. A total of 400 points superimposed on either asbestos fibers or non-asbestos matrix material must be counted over at least eight different preparations of representative sub-samples. If an asbestos fiber and matrix particle overlap so that a point is superimposed on their visual intersection, a point is scored for both categories. Point counting provides a quantification of the area percent asbestos. Per EPA's regulations, materials which have been point-counted and, therefore, quantitatively determined to have less than or equal to one percent (≤1%) asbestos, can be treated as non-ACM. **No samples were point counted during this survey.**

4.0 REGULATORY OVERVIEW

4.1 Asbestos Regulations

The asbestos NESHAP (40 CFR Part 61, Subpart M) regulates asbestos fiber emissions and asbestos waste disposal practices. It also requires the identification and classification of existing building materials prior to demolition or renovation activity. Under NESHAP, asbestos-containing building materials are classified as either friable, Category I non-friable or Category II non-friable ACM. Friable materials are those that, when dry, may be crumbled, pulverized or reduced to powder by hand pressure. Category I non-friable ACM includes packings, gaskets, resilient floor coverings and asphalt roofing products containing more than 1% asbestos. Category II non-friable ACM are any materials other than Category I materials that contain more than 1% asbestos.

Friable ACM, Category I and Category II non-friable ACM which are in poor condition and has become friable or which will be subjected to drilling, sanding, grinding, cutting or abrading and which could be crushed or pulverized during anticipated renovation or demolition activities are considered regulated ACM (RACM).

In the State of Florida, asbestos activities are regulated by the Florida Department of Environmental Protection (FDEP). RACM must be removed prior to demolition activities which will disturb the materials. The owner or operator must provide the FDEP with written notification of planned removal activities at least 10 working days prior to the commencement of asbestos abatement activities. Removal of RACM must be conducted by a State of Florida licensed asbestos abatement contractor.

The OSHA Asbestos standard for construction (29 CFR 1926.1101) regulates workplace exposure to asbestos. The OSHA standard requires that employee exposure to airborne asbestos fibers be maintained below 0.1 asbestos fibers per cubic centimeter of air (0.1 f/cc). The OSHA standard classifies construction and maintenance activities which could disturb ACM, and specifies work practices and precautions which employers must follow when engaging in each class of regulated work.

4.2 Metals Based Protective Coatings and Lead Based Paint Regulations

Cadmium, chromium, zinc and lead have historically been used in paints and coating. Specific regulations regarding lead based paints have been developed by the USEPA. Lead-based paint is defined as a surface coating or paint containing lead in excess of 1.0 milligram per square centimeter (mg/cm^2) or 0.5% by weight (USEPA Toxic Substance Control Act, Section 401). 0.5% is equivalent to 5000 parts per million (ppm). Based on regulations contained in the Lead-Based Paint Poisoning Prevention Act (LBPPPA) and promulgated by the Consumer Product Safety Commission (CPSC), lead-based paint is defined as paint containing more than 0.06% lead as of June 1977. In 1978, the CPSC banned the sale of lead-based paint to consumers.

Under EPA regulations lead, chromium and cadmium impacted wastes generated during abatement activities are handled as either a solid waste or a hazardous waste, depending on the amount and form of each of the heavy metals. If the maximum level of the metal in an extract of a representative sample of the waste stream proposed for disposal, as determined by

a Toxicity Characteristic Leaching Procedure (TCLP) laboratory analysis, is less than the regulatory level set in 40 CFR 261.24, then EPA regulations allow the material to be disposed of as solid waste at a solid waste landfill. If the TCLP analysis equals or exceeds the regulatory level, the material must be managed as a hazardous waste. The regulatory levels for cadmium, chromium and lead are 1.0, 5.0 and 5.0 milligram per liter (mg/L), respectively. Impacted materials that are recycled, such as painted steel beams sent to a scrap metal yard, are not considered waste; therefore, they are exempt from waste disposal regulations; however, other occupational and recycling regulations may apply.

The OSHA established the Lead Standard for the Construction Industry, 29 CFR 1926.62, which applies to all construction work where an employee may be exposed to lead. These exposures include demolition and salvage of structures where lead or material containing lead are present and removal or encapsulation of materials containing lead, as well as alterations and repairs including painting and decorating. The standard defines the occupationally permissible exposure limit and specific requirements for construction work with and in lead materials. OSHA does not have a percentage lead in paint action level in their current construction lead standard. OSHA considers the lead regulation enforceable if the presence of *any* lead in paint at detectable concentrations is present when demolition or renovation activities are performed. Any abatement of the lead-based paint or cutting, sanding, and/or grinding of the structures painted with lead based paint (LBP) should be performed in accordance with OSHA regulations.

Demolition activities are regulated under the NESHAP statue for general dust control. Specifications for the proper work practices, controls and disposal should be developed to document compliance with all applicable regulations.

5.0 FINDINGS AND RECOMMENDATIONS

5.1 Asbestos

Seventeen (17) bulk samples were collected from five (5) homogeneous areas of suspect ACM. A summary of suspect ACM is provided in the following table, along with the results from the laboratory. The analytical results are included in **Appendix A**.

Table 1: Summary of ACM
Hernando DeSoto Bridge - FDOT Structure No. 130053

Homo. No.	Sample No.	Material Description	Approx. Quantity	Lab Results % Asbestos	NESHAP Category
A	1	Residual tar paper strips on underside of decking from construction form joints	Not Measured	<1% Chrysotile	N/A
	2				
	3				
B	4	Tar paper at end bents between bridge decking	500 ft^2	1.5% Chrysotile	RACM
	5				
	6				
C	7	Black expansion joint filler	Not Measured	Not Detected	N/A
	8				
	9				
D	10	Adhesive for reflectors	Not Measured	Not Detected	N/A
	11				
	12				
E	13	Concrete from deck, piles and caps	Not Measured	Not Detected	N/A
	14				
	15				
	17				

One of the seventeen (17) samples tested had asbestos mineral fibers at levels greater than 1 percent. The black tar paper located between the end bents and the bridge decking contained 1.5% chrysotile asbestos. The material was observed to be friable and thus when disturbed as a result of renovations or demolitions would be classified as RACM per NESHAP. The tar paper was not readily observed on intermediate bent caps; however, visual inspection of these areas were limited due to access.

Additionally, residual tar paper strips, approximately 2 inches in width and of various lengths (typically several feet long), were observed on the underside of the decking. These residual strips were found to contain less 1% chrysotile asbestos. The strips were presumably used to tape cracks in the plywood deck forms at the joints where the sheets abutted and remained adhered to the concrete after the removal of the forms. This material is not ACM per EPA since it is below the 1% threshold.

It should be noted that suspect materials, other than those identified during the survey could exist within the structure in areas not accessible to the inspector at the time of the survey. Should suspect materials other than those which were identified during this survey be uncovered during the renovation/demolition process, those materials should be assumed to be ACM until sampling and analysis can confirm or refute their asbestos content.

5.2 Protective Coating/Lead Based Paint

The steel bearing plates at the bridge we observed to be painted. One (1) composite sample of paint was analyzed to determine the content of select heavy metals historically used in paints. The sample was analyzed for lead, cadmium, chromium and zinc. The paint did not contain lead in a quantity to meet EPA's definition of Lead Based Paint (LBP). A summary of the results are provided in the table below.

Table 2: Grab Sample Total Metals

Sample No.	Location	Lead mg/kg	Cadmium mg/kg	Chromium mg/kg	Zinc mg/kg
1	Silver paint on bearing plate	399	25.3	69.5	4,710

Based on the results for the total concentration of the metals, it does not appear that the coating materials would be classified as a hazardous waste per 40 CFR 261. This is dependent on whether the paint is removed as a separate paint waste or in combination with the bearing plates. Recycling the bearing plates as a whole, likely offers the best solution since recycled metals are generally exempt for the 40 CFR 261 requirements since they are not considered a "Solid Waste" but rather a recycled material. Prior to disposal of any waste paint materials, a TCLP analysis of the waste should be performed to make a final determination.

6.0 GENERAL COMMENTS

This survey was conducted in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions in the same locale, with the limitation noted above. The results, findings, conclusions and recommendations expressed in this report are based on conditions observed during our survey of the subject bridge structure. The information contained in this report is relevant to the date on which this survey was performed, and should not be relied upon to represent conditions at a later date. Tierra does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report. No warranty, express or implied, is made.

APPENDIX A

Laboratory Results

DOVE ENVIRONMENTAL CORP.
8910 MIRAMAR PARKWAY, SUITE 200 MIRAMAR FL 33025
Tel. (954) 374-9274 Fax: (954) 639-7426

ASBESTOS TEST REPORT

CLIENT : TIERRA CONSULTING GROUP, INC.
ADDRESS: 7351 TEMPLE TERRACE HIGHWAY
TAMPA FL 33637
PROJECT: BRIDGE STRUCTURE # 130053
MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 1
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO. : 01
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: <1% CHRYSOTILE
OTHER FIBERS : 29.5% CELLULOSE
NON FIBERS : 10% MINERALS

SAMPLE NO.: A1
DATE OF ANALYSIS: 07/14/11
60% BITUMEN

LAB NO. : 02
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: <1% CHRYSOTILE
OTHER FIBERS : 29.5% CELLULOSE
NON FIBERS : 10% MINERALS

SAMPLE NO.: A2
DATE OF ANALYSIS: 07/14/11
60% BITUMEN

LAB NO. : 03
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: <1% CHRYSOTILE
OTHER FIBERS : 29.5% CELLULOSE
NON FIBERS : 10% MINERALS

SAMPLE NO.: A3
DATE OF ANALYSIS: 07/14/11
60% BITUMEN

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B Bandu
Analyst 1

R. Ramnath
Rajendranath Ramnath
LABORATORY MANAGER

DOVE ENVIRONMENTAL CORP.
8910 MIRAMAR PARKWAY, SUITE 200 MIRAMAR FL 33025
Tel. (954) 374-9274 Fax: (954) 639-7426

ASBESTOS TEST REPORT

CLIENT : TIERRA CONSULTING GROUP, INC.
ADDRESS: 7351 TEMPLE TERRACE HIGHWAY
TAMPA FL 33637
PROJECT: BRIDGE STRUCTURE # 130053
MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 2
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO. : 04
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: 1.5 % CHRYSOTILE
OTHER FIBERS : 20% CELLULOSE
NON FIBERS : 20% MINERALS
58.5% BITUMEN
SAMPLE NO.: B1
DATE OF ANALYSIS: 07/14/11

LAB NO. : 05
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: 1.5 % CHRYSOTILE
OTHER FIBERS : 20% CELLULOSE
NON FIBERS : 20% MINERALS
58.5% BITUMEN
SAMPLE NO.: B2
DATE OF ANALYSIS: 07/14/11

LAB NO. : 06
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : TAR PAPER
ASBESTOS TYPE: 1.5 % CHRYSOTILE
OTHER FIBERS : 20% CELLULOSE
NON FIBERS : 20% MINERALS
58.5% BITUMEN
SAMPLE NO.: B3
DATE OF ANALYSIS: 07/14/11

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Analyst 1

Rajendranath Ramnath
LABORATORY MANAGER

DOVE ENVIRONMENTAL CORP.
8910 MIRAMAR PARKWAY, SUITE 200 MIRAMAR FL 33025
Tel. (954) 374-9274 Fax: (954) 639-7426

ASBESTOS TEST REPORT

CLIENT : TIERRA CONSULTING GROUP, INC.
ADDRESS: 7351 TEMPLE TERRACE HIGHWAY
TAMPA FL 33637
PROJECT: BRIDGE STRUCTURE # 130053
MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 3
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO.	: 07		SAMPLE NO.: C1
FRI/HOM	: NO/YES	LAYERS: 01	DATE OF ANALYSIS: 07/14/11
DESCRIPTION	: JOINT FILLER		
ASBESTOS TYPE	: NONE-DETECTED		
OTHER FIBERS	: 10% CELLULOSE		
NON FIBERS	: 10% MINERALS		80% BITUMEN

LAB NO.	: 08		SAMPLE NO.: C2
FRI/HOM	: NO/YES	LAYERS: 01	DATE OF ANALYSIS: 07/14/11
DESCRIPTION	: JOINT FILLER		
ASBESTOS TYPE	: NONE-DETECTED		
OTHER FIBERS	: 10% CELLULOSE		
NON FIBERS	: 10% MINERALS		80% BITUMEN

LAB NO.	: 09		SAMPLE NO.: C3
FRI/HOM	: NO/YES	LAYERS: 01	DATE OF ANALYSIS: 07/14/11
DESCRIPTION	: JOINT FILLER		
ASBESTOS TYPE	: NONE-DETECTED		
OTHER FIBERS	: 10% CELLULOSE		
NON FIBERS	: 10% MINERALS		80% BITUMEN

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B Ramnath
Analyst 1

R. Ramnath
Rajendranath Ramnath
LABORATORY MANAGER

DOVE ENVIRONMENTAL CORP.
8910 MIRAMAR PARKWAY, SUITE 200 MIRAMAR FL 33025
Tel. (954) 374-9274 Fax: (954) 639-7426

ASBESTOS TEST REPORT

CLIENT : TIERRA CONSULTING GROUP, INC.
ADDRESS: 7351 TEMPLE TERRACE HIGHWAY
TAMPA FL 33637
PROJECT: BRIDGE STRUCTURE # 130053
MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 4
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO. : 10
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : REFLECTOR ADHENSIVE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 10% MINERALS
20% POLYMERS

SAMPLE NO.: D1
DATE OF ANALYSIS: 07/14/11

65% BITUMEN

LAB NO. : 11
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : REFLECTOR ADHENSIVE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 10% MINERALS
20% POLYMERS

SAMPLE NO.: D2
DATE OF ANALYSIS: 07/14/11

65% BITUMEN

LAB NO. : 12
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : REFLECTOR ADHENSIVE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 10% MINERALS
20% POLYMERS

SAMPLE NO.: D3
DATE OF ANALYSIS: 07/14/11

65% BITUMEN

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Analyst 1

Rajendranath Ramnath
LABORATORY MANAGER

DOVE ENVIRONMENTAL CORP.
8910 MIRAMAR PARKWAY, SUITE 200 MIRAMAR FL 33025
Tel. (954) 374-9274 Fax: (954) 639-7426

ASBESTOS TEST REPORT

CLIENT : TIERRA CONSULTING GROUP, INC.
ADDRESS: 7351 TEMPLE TERRACE HIGHWAY
TAMPA FL 33637
PROJECT: BRIDGE STRUCTURE # 130053
MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 5
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO. : 13
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : CONCRETE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 65% MINERALS

SAMPLE NO.: E1
DATE OF ANALYSIS: 07/14/11
30% POLYMERS

LAB NO. : 14
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : CONCRETE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 65% MINERALS

SAMPLE NO.: E2
DATE OF ANALYSIS: 07/14/11
30% POLYMERS

LAB NO. : 15
FRI/HOM : NO/YES LAYERS: 01
DESCRIPTION : CONCRETE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 65% MINERALS

SAMPLE NO.: E3
DATE OF ANALYSIS: 07/14/11
30% POLYMERS

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8910 MIRAMAR PARKWAY, SUITE 200 MIRAMAR FL 33025
Tel. (954) 374-9274 Fax: (954) 639-7426

ASBESTOS TEST REPORT

CLIENT : TIERRA CONSULTING GROUP, INC.
ADDRESS: 7351 TEMPLE TERRACE HIGHWAY
TAMPA FL 33637
PROJECT: BRIDGE STRUCTURE # 130053
MANATEE COUNTY
CONSULT: SCOTT CRANDALL, P.E

PAGE : 6
DATE : 07/14/11
SAMPLE ID : D107448
NVLAP Lab Code: 102053-0

LAB NO. : 16
FRI/HOM : NO/YES
DESCRIPTION : CONCRETE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 65% MINERALS

LAYERS: 01

SAMPLE NO.: E4
DATE OF ANALYSIS: 07/14/11

30% POLYMERS

LAB NO. : 17
FRI/HOM : NO/YES
DESCRIPTION : CONCRETE
ASBESTOS TYPE: NONE-DETECTED
OTHER FIBERS : 5% CELLULOSE
NON FIBERS : 65% MINERALS

LAYERS: 01

SAMPLE NO.: E5
DATE OF ANALYSIS: 07/14/11

30% POLYMERS

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Analyst 1

Rajendranath Ramnath
LABORATORY MANAGER

US 41 Bridge over Manatee River STRUCTURE 130053

DOVE ENVIRONMENTAL LABORATORIES

4715 NW 157th ST.,
SUITE 203
MIAMI, FL 33014
(305) 620-6050 Tel (305) 620-6350 Fax
E-mail : dovelabs@bellsouth.net

361

CHAIN OF CUSTODY – BULK ASBESTOS

Client Name : Tierra INC
Address : 7351 Temple Terrace Tampa FL
Project Name : Bridge Structure # 130053

Date : 7/13/2011
Lab ID : D 1074498
Total Samples Collected : _____
Project # : _____

Sample #	Description	Location	Results
A1-A3	Tar Paper	Miscellaneous Seams	
B1-B3	Tar Paper	End Bents	
C1-C3	Joint filler		
D1-D3	Reflector Adhesive	Centerline	
E1-E5	Concrete	Miscellaneous	

Project Location : Manatee County

Sampler's Name : Scott Crandall
Sampler's Signature : _____
Received at Lab : _____
Conditions Sample was received : _____

Date Collected : 7/13/2011
Turn Around (hrs) : 8 [] 24[] 48[] other [] STANDARD
Date received : 07/14/11 @ 9 AM STAT
Comments : _____

Form : Chainofcustody.asbestos

SPECTRUM ANALYTICAL, INC.
Featuring
HANIBAL TECHNOLOGY
Florida Division

Florida	# E84207
Texas	# T104704408-11-3
South Carolina	# 96011001
North Dakota	# R-178

California	# 07253CA
Louisiana	# 02025
Kansas	# E-10385
Arkansas	# 11-036-1

- CERTIFICATE OF ANALYSIS -

Report Date: 07/26/2011

To: Scott Crandall
Scott Crandall
204 37th Ave North
St Petersburg, FL 33704

Work 813-335-5341
FAX

PROJECT ID: US 41 Bridge Over Manatee Riv
WORK ORDER: 3503559 Revised Report
DATE RECEIVED: Monday, July 18, 2011

Project Notes: Report revised to remove Ca and report Cd per client.

(†): Short Hold Time Analysis Date

Samples reported on dry weight basis
All test results in this report pertain only to the samples as submitted.

Spectrum Analytical, Inc. FL Division Contact: Mark Gudnason / extension: 242
8405 Benjamin Road, Suite A• Tampa, Florida 33634
813-888-9507• FAX: 813-889-7128
Website: www.pelab.com

Spectrum Analytical, Inc. FL Division
featuring Hanibal Technology

DATA QUALIFIER CODES

State of Florida, Department of Environmental Protection and
Department of Health _Rehabilitative Services / NELAC

I The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

J Estimated value; value not accurate. This code shall be used in the following instances:

1. Surrogate recovery limits have been exceeded.
2. No known quality control criteria exits for the component.
3. The reported value did not meet the established quality control criteria for either precision or accuracy but falls within the NELAC marginal exceedance range.

3M. The reported value did not meet the established quality control criteria for either precision or accuracy and falls beyond the NELAC range for marginal exceedances.

3R. The RPD for the LCSD exceeds the laboratory established control limits.

4. The sample matrix interfered with the ability to make an accurate determination.
5. The data is questionable because of improper laboratory or field protocols (e.g. composite sample was collected instead of a grab sample).

L Off-scale high. Actual value is known to be greater than the value given. To be used when the concentration of the analyte is above the acceptable limit for quantitation (exceeds the linear range of the highest calibration standard) and the calibration curve is known to exhibit a negative deflection.

Q Sample held beyond acceptable holding time. This code shall be used if the value is derived from a sample that was prepared or analyzed after the approved holding time restrictions for the sample preparation or analysis.

U Indicates that the compound was analyzed for but not detected above the method detection limit (MDL).

V Indicates that the analyte was detected in both the sample and the associated method blank. Note: The value in the blank shall not be subtracted from associated samples.

Y The laboratory analysis was from an unpreserved or improperly preserved sample. The data may not be accurate.

RL - Reporing Limit. The PEL lowest Practical Quanititation Limit (PQL), defined by the lowest point in the calibration curve.

CASE NARRATIVE
METALS

Spectrum Analytical Inc. Lab Reference No./SDG: 3503559

Client: Crandall

I. RECEIPT

Exceptions encountered upon receipt are addressed in the Sample Receipt Confirmation Report, included with the Chain-of-Custody documentation, or communication included in the addendum with this package.

II. HOLDING TIMES

A. Sample Preparation: All holding times were met.

B. Sample Analysis: All holding times were met.

III. METHOD

Analyses were performed according to the Spectrum Analytical Inc. Standard Operating Procedures and EPA Method 6010B for ICP metals.

IV. PREPARATION

Soil samples were prepared according to PEL Laboratory's Standard Operating Procedures and EPA Method 3050B.

V. ANALYSIS

A. Calibration:

All acceptance criteria were met.

B. Blanks:

1. Calibration Blanks:

All acceptance criteria were met.

2. Method Blanks:

All acceptance criteria were met.

C. Spikes:

1. Laboratory Control Spikes (LCS):

An LCS/LCSD set was analyzed.
All percent recovery and relative percent difference (RPD) criteria were met.

2. Post Digestion Spike:

All acceptance criteria were met with the exception of:

CASE NARRATIVE
METALS

Spectrum Analytical Inc. Lab Reference No./SDG: 3503559

Client: Crandall

Post Digestion Spike 350355901A was analyzed with the soil samples on 07/20/11. The following analyte(s) were recovered below criteria: Lead at 43.6 % with criteria of (80-120). The most probable cause for the PDS exceeding limits is sample matrix due to the fact that the LCS/LCSD pass all quality control criteria. No further action was taken.

3. **Matrix Spike/Matrix Spike Duplicate Samples (MS/SD):**

No spikes requested by client.

D. Duplicate:

No sample duplicates are reported with this method. (Spike duplicates are referenced above in section C. Spikes.)

E. Serial Dilution:

All acceptance criteria were met.

F. ICP Interference Check Samples:

All acceptance criteria were met.

G. Samples:

Sample analysis proceeded normally.
Sample Sample 1 required a 25X dilution due to high concentration of the following analyte(s): Zinc.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and Spectrum Analytical Inc., both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as, verified by the following signature.

Signature: _____

Name: Troy L. Roberts Title: Inorg. Manager

SIGNED: **DATE:** 07/25/2011

- CERTIFICATE OF ANALYSIS -

FLDOH #E84207

To: Scott Crandall
Scott Crandall

WORK ORDER: 3503559

PROJECT ID: US 41 Bridge Over Manatee Riv

Lab# : 350355901

Client ID : Sample 1

Matrix : S

Collection Information:

Sample Date: 7/13/2011

Parameter	Method	Results	Analysis Date	Prep Date	Units	MDL	RL	Dilution Factor
Cadmium	6010	**25.3**	07/20/2011 14:00	07/19/2011 12:15	MG/KG	0.0512	0.512	1
Chromium	6010	**69.5**	07/20/2011 14:00	07/19/2011 12:15	MG/KG	0.164	0.512	1
Lead	6010	**399**	07/20/2011 14:00	07/19/2011 12:15	MG/KG	0.348	0.82	1
Zinc	6010	**4710**	07/22/2011 11:55	07/19/2011 12:15	MG/KG	8.45	25.6	25

- CERTIFICATE OF ANALYSIS -

FLDOH #E84207

To: Scott Crandall
Scott Crandall

WORK ORDER: 3503559
PROJECT ID: US 41 Bridge Over Manatee Riv

QC SUMMARY

METHOD: 6010

Method Blank : 93294MB **Matrix :** SQ

Associated Lab Samples : 350355901 350355901DL1 93294MB 93295LCS 93296LCSD

Parameter	Results	Analysis Date	Prep Date	Units	RL	Dilution Factor
Cadmium	U	7/22/2011	7/19/2011	MG/KG	0.0493	1
Chromium	U	7/22/2011	7/19/2011	MG/KG	0.158	1
Lead	U	7/22/2011	7/19/2011	MG/KG	0.335	1
Zinc	U	7/22/2011	7/19/2011	MG/KG	0.325	1

LABORATORY CONTROL SAMPLE: 93295LCS **Matrix :** SQ

PARAMETER	UNITS	SPIKE CONC	LCS RESULT	SPIKE % REC	% REC LIMITS	RPD	RPD LIMIT
Cadmium	mg/Kg	49.6	47.8	96.4	(80-120)		
Chromium	mg/Kg	49.6	48.8	98.4	(80-120)		
Lead	mg/Kg	49.6	48.4	97.6	(80-120)		
Zinc	mg/Kg	49.6	47.9	96.6	(80-120)		

LABORATORY CONTROL SAMPLE: 93296LCSD **Matrix :** SQ

PARAMETER	UNITS	SPIKE CONC	LCS RESULT	SPIKE % REC	% REC LIMITS	RPD	RPD LIMIT
Cadmium	mg/Kg	49.5	49	99	(80-120)	2.5	20
Chromium	mg/Kg	49.5	50.2	101.4	(80-120)	2.8	20
Lead	mg/Kg	49.5	49.4	99.8	(80-120)	2	20
Zinc	mg/Kg	49.5	49.5	100	(80-120)	3.3	20

- CERTIFICATE OF ANALYSIS -

FLDOH #E84207

To: Scott Crandall
Scott Crandall

WORK ORDER: 3503559

PROJECT ID: US 41 Bridge Over Manatee Riv

Brian C. Spann Laboratory Manager

or

Mark Gudnason Technical Director

PEL

CHAIN OF CUSTODY RECORD

3503559

Page 1 of 1

Special Handling:
TAT- Indicate Date Needed: _____
- All TATs subject to laboratory approval. Min. 24-hour notification needed for rushes.
- Samples disposed of after 60 days unless otherwise instructed.

Report To: Terra Inc
7351 Temple Terrace Hwy
Tampa FL 33637

Project Mgr.: SCrandall

Invoice To: SAME

P.O. No.: _____ RQN: _____

Project No.: 6512-11-011
Site Name: US 41 Bridge over Manatee R.
Location: Manatee Cty State: FL
Sampler(s): SCrandall

1=Na_2S2O_3 2=HCl 3=H_2SO_4 4=HNO_3 5=NaOH 6=Ascorbic Acid 7=CH_3OH
8= $NaHSO_4$ 9=_____ 10=_____ 11=_____

List preservative code below:

Notes:

DW=Drinking Water GW=Groundwater WW=Wastewater
O=Oil SW= Surface Water SO=Soil SL=Sludge A=Air
X1=_____ X2=_____ X3=_____

G=Grab C=Composite

Lab Id:	Sample Id:	Date:	Time:	Type	Matrix	Containers: # of VOA Vials	# of Amber Glass	# of Clear Glass	# of Plastic	Bassle	Analyses: Zn Pb Cu	QA/QC Reporting Level
-01	Sample 1	7/15/11			S					✓	✓	

QA/QC Reporting Level
☐ Level I ☐ Level II
☐ Level III ☐ Level IV
☐ Other _____
State specific reporting standards:

☐ E-mail to SCrandall@Quantumdata.com
EDD Format _____

Relinquished by:

Received by:

Date:	Time:
7/18/11	0830

Condition upon receipt: ☐ Iced ☒ Ambient ☐ °C_____

SAMPLE RECEIPT CONFIRMATION SHEET

Client Information

SDG:	3503559	**Req:**	90612
Client:	Crandall	**Project:**	Generic
Level:	1	**Date Rec'd:**	7/18/2011 8:30:00 AM
Rec'd via:	Courier	**Due Date:**	7/25/2011

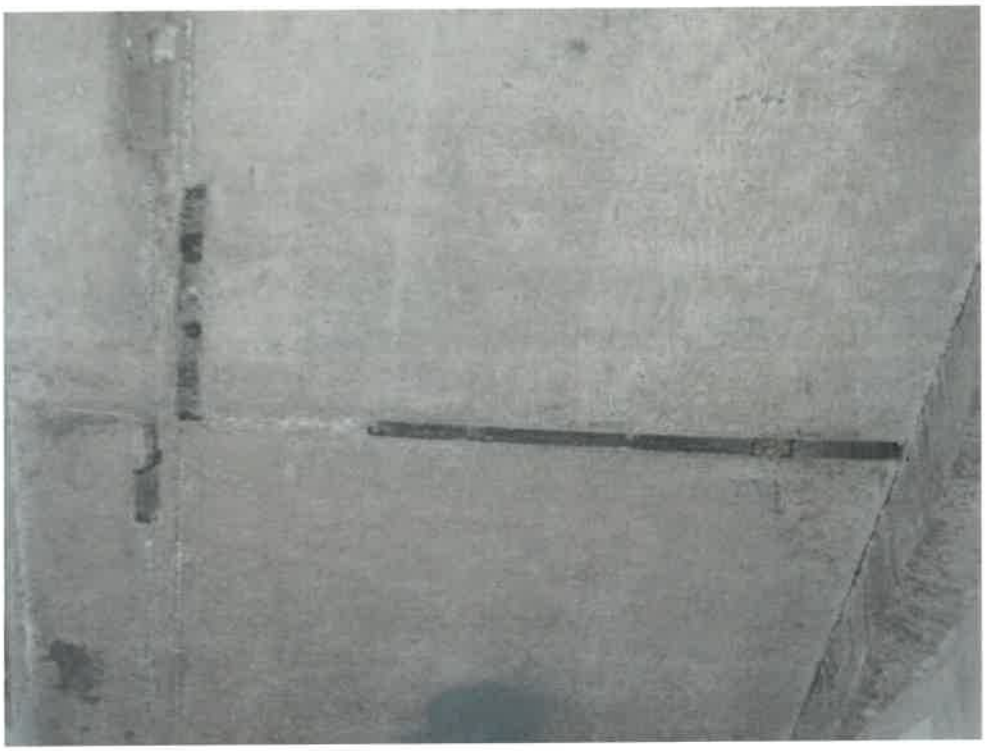
Sample Verification

Samples/Cooler Secure?	Yes	**All Samples on COC accounted For?**	Yes
Temperature of Samples(Celsius)	ambient	**All Samples Rec'd Intact?**	Yes
pH Verified?	No	**Sample Vol. Sufficient For Analysis**	Yes
pH WNL?	No	**Samples Rec'd W/I Hold Time?**	Yes
Soil Origin (Domestic/Foreign):	Domestic	**Are All Samples to be Analyzed?**	Yes
Site Location/Project on COC?	Yes	**Correct Sample Containers?**	Yes
Client Project # on COC?	Yes	**COC Comments written on COC?**	Yes
Project Mgr. Indicated on COC?	Yes	**Samplers Initials on COC?**	Yes
COC relinquished/Dated by Client?	Yes	**Sample Date/Time Indicated?**	Yes
COC Received/Dated by PEL?	Yes	**TAT Requested:**	STD
Specific Subcontract Indicated?	No	**Client Requests Verbal Results?**	No
Samples Received By	Courier	**Client Requests Faxed Results?**	No
PEL to Conduct ALL Analyses?	Yes		
Radioactivity Check?	No		
COC Present?	Yes		

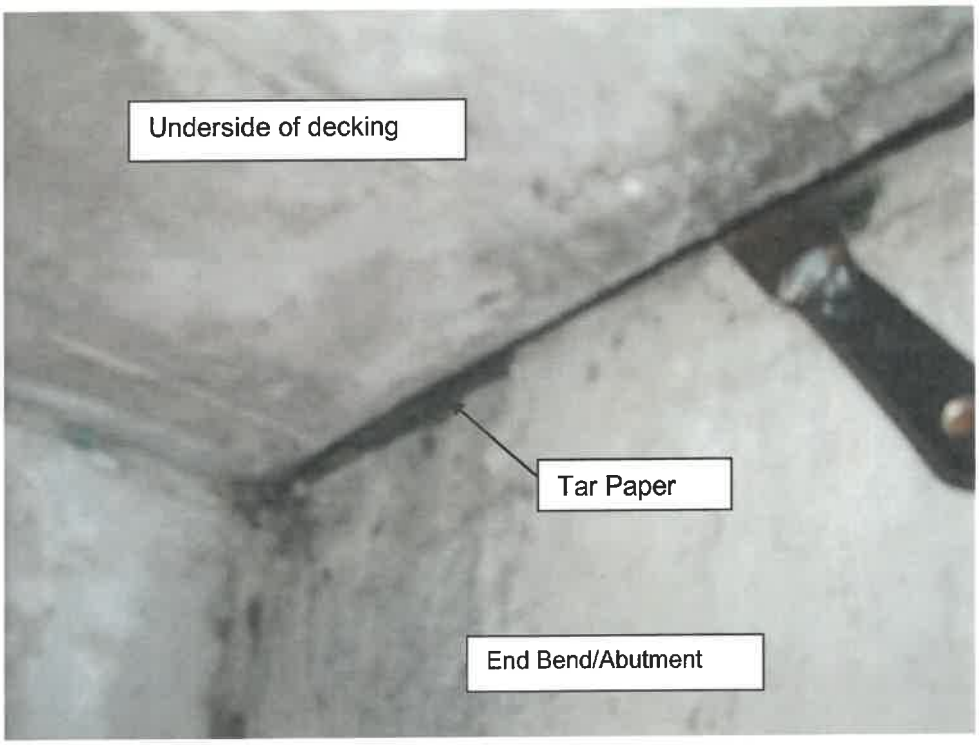
PEER REVIEW: 

APPENDIX B

Photograph Log



Homogeneous Material A – Residual tar paper



Homogenous Material B – Black tar paper between decking and end bent



Homogeneous Material C – Poured joint filler at expansion joints on decking



Homogeneous Material D – Adhesive for reflectors



Homogeneous Material E – Various concrete elements

APPENDIX C

Personnel Training Certificates

Vern Roberts Environmental Training, Inc.

13987 94th Avenue N Seminole, FL 33776

727-593-3067

Asbestos Contractor Supervisor Refresher Training

This is to Certify that

Scott Crandall

Training was in accordance with Title II of TSCA, 40 CFR Part 763. Appendix C to Subpart E as revised

Date of Examination 10/8/10

Date of Course: 10/8/10 Expiration Date 10/8/11

Certificate # 10081004 CM Points: 1.0

Course # FL490006321 Provider # FL490003810

Instructor

Vern Roberts Environmental Training, Inc.

13987 94th Avenue N Seminole, FL 33776

727-593-3067

Asbestos Project Designer Refresher Training

This is to Certify that

Scott Crandall

Training was in accordance with Title II of TSCA, 40 CFR Part 763. Appendix C to Subpart E as revised

Date of Examination 10/11/10

Date of Course: 10/11/10 Expiration Date 10/11/11

Certificate # 10111003 CM Points: 0.5

Course #FL0490006324 Provider #FL0490003810

Instructor

Vern Roberts Environmental Training, Inc.

13987 94th Avenue N Seminole, FL 33776

727-593-3067

Asbestos Management Planner Training

This is to Certify that

Scott Crandall

Has completed the requisite training for asbestos accreditation under TSCA TITLE 11

Date of Examination 10/9/10

Date of Course: 10/9/10 Expiration Date 10/9/11

Certificate # 100904

Course # FL49-000636323 Provider # FL49-0003810

Instructor

Vern Roberts Environmental Training, Inc.

13987 94th Avenue N Seminole, FL 33776

727-593-3067

Asbestos Survey & Mechanical (Inspector) Refresher Training

This is to Certify that

Scott Crandall

Training was in accordance with Title II of TSCA, 40 CFR Part 763. Appendix C to Subpart E as revised

Date of Examination 10/9/10

Date of Course: 10/9/10 Expiration Date 10/9/11

Certificate # 10091004 CM Points: 0.5

Course # FL490006322 Provider # FL490003810

Instructor

AC# 5330327

STATE OF FLORIDA

DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION
ASBESTOS LICENSING UNIT

SEQ# L10110401182

DATE	BATCH NUMBER	LICENSE NBR
11/04/2010	108106588	EA0000060

The ASBESTOS CONSULTANT - ENGINEER
Named below IS LICENSED
Under the provisions of Chapter 469 FS.
Expiration date: NOV 30, 2012

CRANDALL, SCOTT S
DIVERSIFIED PROFESSIONAL SERVICES CORP
3600 10TH ST NE
ST PETERSBURG FL 33704

CHARLIE CRIST
GOVERNOR

CHARLIE LIEM
SECRETARY

DISPLAY AS REQUIRED BY LAW

AC# 4715802

STATE OF FLORIDA

DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION
ASBESTOS LICENSING UNIT

SEQ# L09111001177

DATE	BATCH NUMBER	LICENSE NBR
11/10/2009	090150982	ZA405

The ASBESTOS BUSINESS ORGANIZATION
Named below IS LICENSED
Under the provisions of Chapter 469 FS.
Expiration date: NOV 30, 2011

TIERRA INC
SCOTT S CRANDALL
7351 TEMPLE TERRACE HWY
TAMPA FL 33637

CHARLIE CRIST
GOVERNOR

CHARLES W. DRAGO
SECRETARY

DISPLAY AS REQUIRED BY LAW

Site No. 49

Palmetto Economic Enhancement District

BW912 01000

PALMETTO
community redevelopment agency

715 4th Street West
Palmetto, Florida 34221

January 22, 2013

BUREAU OF WASTE CLEANUP
RECEIVED
JAN 28 2013
FEDERAL PROGRAMS SECTION

Kim Walker
Environmental Administrator
FL Dept. of Environmental Protection
Division of Waste Management
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Ms. Walker,

On December 3, 2012, the Palmetto City Commission unanimously adopted resolution 2012-39, which designated the bulk of the community redevelopment area in Palmetto as a brownfield area, to be called the "Palmetto Economic Enhancement District." Five property owners opted out and their parcels are listed in the motion to adopt the resolution as not to be included in the brownfield area designation. Minutes of the December 3 meeting were approved by the commission on January 7, 2013. Enclosed are copies of the resolution, the motion to adopt the resolution and a map of the brownfield area.

The Palmetto Community Redevelopment Agency coordinates redevelopment within the community redevelopment area and it will also facilitate brownfield redevelopment activities within the Palmetto Economic Enhancement District, as well. The main point of contact at the CRA will be Robert Marble, who can be reached by phone at 941 723-4988, by e-mail at rmarble@palmettofl.org, or through the CRA mailing address above. In addition, please do not hesitate to contact the undersigned on matters related to brownfield redevelopment.

We look forward to working with you in the future.

Sincerely,

Jeff Burton
Director

cc: John Sego

BUREAU OF WASTE CLEANUP
RECEIVED

JAN 2 8 2013

FEDERAL PROGRAMS SECTION

RESOLUTION NO. 2012-39

A RESOLUTION OF THE CITY COMMISSION OF THE CITYOF PALMETTO, FLORIDA, DESIGNATING THE AREA FOR INCLUSION WITHIN THE PALMETTO COMMUNITY REDEVELOPMENT DISTRICT AS A BROWNFIELD AREA FOR THE PURPOSE OF ENVIRONMENTAL REMEDIATION, REHABILITATION AND ECONOMIC REDEVELOPMENT; AUTHORIZING THE CITY CLERK TO NOTIFY THE FLORIDA DEPARTMENT OF ENVIRONMENTALPROTECTION OF SAID DESIGNATION AS REQUIRED; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the State of Florida has provided in Ch. 97-277, Laws of Florida, codified as Sections 376.77 - 376.85, Florida Statutes, as amended, which is known as the "Brownfield Redevelopment Act" (the Act) for the designation by resolution of certain lands as a "Brownfield Area", and for the corresponding provision of environmental remediation, rehabilitation, and economic redevelopment for such areas; and

WHEREAS, the City of Palmetto shall notify the Florida Department of Environmental Protection of its decision to designate a Brownfield Area for remediation, rehabilitation, and economic redevelopment including the required map, as set forth in the Act; and

WHEREAS, the entire Brownfield Area is located within the Palmetto Community Redevelopment Area; and

WHEREAS, the City of Palmetto has complied with the procedures set forth in Section166.041, Florida Statutes (2012), including notice and public hearing(s) in accordance with Sections 376.80(1) and 166.041(3)(c)2, Florida Statutes (2012).

NOW, THEREFORE, BE IT RESOLVED BY THE CITY OF PALMETTO, FLORIDA:

Section 1. Recitals. The recitals set forth in the whereas clauses to this Resolution are hereby adopted as the legislative findings of the City Commission.

Section 2. Area and Conditions. The mapped area described in Exhibit "A", attached here to and incorporated herein by reference, is hereby designated as the Palmetto Economic Enhancement District and as a Brownfield Area for environmental remediation, rehabilitation, and economic redevelopment as set forth in the Act under the following terms and conditions:

a. The City of Palmetto shall, as soon as practical, designate the entity or entities responsible for the remediation and rehabilitation of the Brownfield Area, or specific portions thereof pursuant to Section 376.80(3), Florida Statutes. The designation of a responsible entity shall not render the City of

Palmetto responsible for the costs and liabilities associated with site remediation, rehabilitation, economic redevelopment, or source removal, as those terms are denied in the Act unless the City of Palmetto specifically designates itself as a responsible person pursuant to said Section.

b. The designation of such Brownfield Area by this Resolution does not render the City of Palmetto responsible for the costs and liabilities associated with site remediation, rehabilitation, economic development, or source removal, as those terms are denied in the Act unless the City of Palmetto specifically designates itself as a responsible person pursuant to Section 376.80(3), Florida Statutes (2012).

c. Nothing in this Resolution shall be deemed to prohibit, limit, or amend the authority and power of the City of Palmetto, to designate any other property or properties as a Brownfield Site or Brownfield Area, or to modify, amend, or withdraw the designation as established herein.

Section 3. Clerk's Notification. In accordance with Section 376.80(1), Florida Statutes (2012), the City Clerk is hereby directed to notify the Florida Department of Environmental Protection of the City of Palmetto's designation of a Brownfield Area for rehabilitation for the purposes of Sections 376.77-376.85, Florida Statutes (2012).

Section 4. Advisory Committee. The CRA Advisory Board shall serve as the City Advisory Committee pursuant to Section 376.80(4), Florida Statutes (2012).

Section 5. Effective Date. The provisions of this Resolution shall take effect immediately upon adoption.

APPROVED AND ADOPTED, by the City Commission, in open session, with a quorum present and voting, this 3 day of December, 2012.

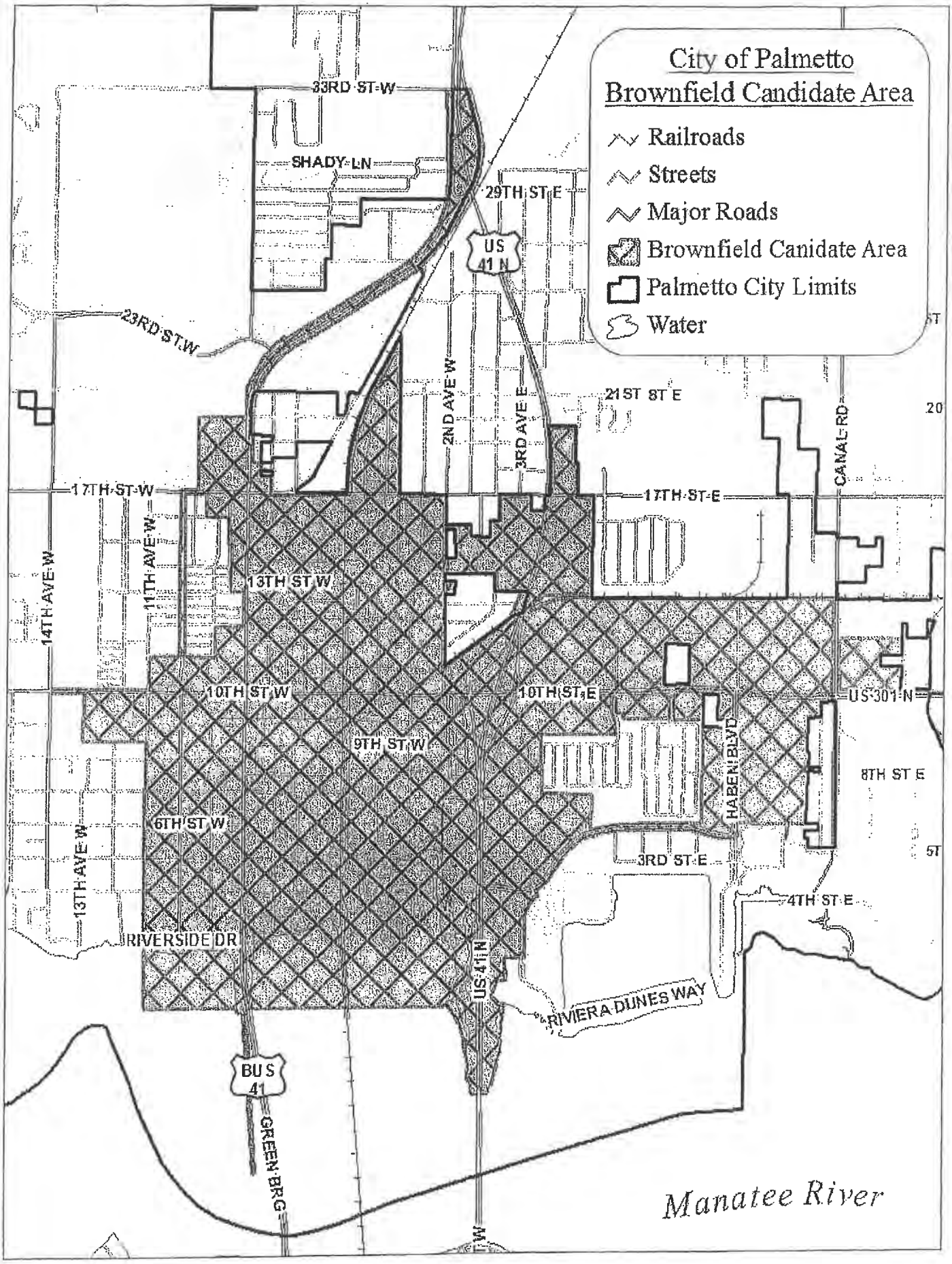
CITY OF PALMETTO, FLORIDA, BY AND THROUGH THE CITY COMMISSION OF THE CITY OF PALMETTO

By: Shirley Groover Bryant
SHIRLEY GROOVER BRYANT, MAYOR

ATTEST: James R. Freeman
City Clerk

By: _____
City Clerk/Deputy Clerk

601384/1


City of Palmetto
Brownfield Candidate Area
Railroads
Streets
Major Roads
Brownfield Canidate Area
Palmetto City Limits
Water
33RD ST W
SHADY LN
29TH ST E
US 41 N
23RD ST W
2ND AVE W
3RD AVE E
21ST ST E
CANAL RD
17TH ST W
17TH ST E
14TH AVE W
11TH AVE W
13TH ST W
10TH ST W
10TH ST E
US 301 N
9TH ST W
HABEN BLVD
8TH ST E
6TH ST W
3RD ST E
4TH ST E
13TH AVE W
RIVERSIDE DR
US 41 N
RIVIERA DUNES WAY
BUS 41
GREEN BRG
Manatee River

CITY OF PALMETTO
CITY COMMISSION MEETING
AND CRA BOARD MEETING
DECEMBER 3, 2012
7:00 PM

Elected Officials Present
Shirley Groover Bryant, Mayor
Brian Williams, Vice Mayor, Commissioner, Ward 3
Tamara Cornwell, Commissioner-at-Large 2
Jonathan Davis, Commissioner-at-Large 1
Charles Smith, Commissioner, Ward 1
Tambra Varnadore, Commissioner, Ward 2

Staff Present
Mark Barnebey, City Attorney
Jeff Burton, CRA Director
Jim Freeman, City Clerk
Javier Vargas, Public Works Superintendent
Rick Wells, Chief of Police
Amber Foley, Assistant City Clerk

Vice Mayor Williams called the meeting to order at 7:00 p.m.

Larry Prichett, Pastor of Palm View First Baptist Church, gave the invocation, followed by the Pledge of Allegiance.

Judge Thomas Gallen, administered the Oath of Office to Mayor Shirley Groover Bryant.

Vice Mayor Williams relinquished the gavel to Mayor Shirley Groover Bryant to preside over the balance of the City Commission meeting.

Mayor Bryant gave her statement, commenting on several accomplishments that have been achieved during her first term as Mayor. She thanked current and past Commissioners and City staff for their hard work and effort in helping to accomplish these projects.

Mayor Bryant recessed the City Commission meeting at 7:13 p.m. for a reception to recognize her reelection.

Mayor Bryant resumed the City Commission meeting at 7:27 p.m.

All persons intending to address City Commission were duly sworn.

Non-agenda Item Public Comment:
Ian Boyle of Waste Service of Florida informed Commission they will be moving their regional office from Sarasota to Palmetto. The office will be located at 1312 16th Avenue East and will create approximately 25 full-time jobs.

1. CITY COMMISSION AGENDA APPROVAL
Mayor Bryant clarified that Item 2.A.1. of the Consent Agenda is for a term of two years, not three years. The attorney for the Board is working on making some changes to their policies and procedures to correct the terms to two years as stated in the Charter.

Mr. Freeman informed Commission that the total litigation related to the PBA Union is $105,455.22. This amount includes the invoices that are on the agenda tonight.

Regarding 3.A., Mayor Bryant stated that another property owner has provided a written exemption requesting the removal of their property from the brownfields designation.

Motion: **Commissioner Williams moved, Commissioner Smith seconded, and the motion carried 5-0 to approve the December 3, 2012 Agenda.**

2. CONSENT AGENDA APPROVAL
A. Mayor's Office
    1. 2013 General Employees' Pension Board of Trustees Appointments

B. City Clerk's Office:
1. Minutes: November 5, 2012
2. 2013 Holiday Schedule and 2013 Commission Meeting Schedule
3. Bryant Miller Olive and Blalock Walters Special Legal Billings
4. EAP Contract Renewal

Motion: **Commissioner Varnadore moved, Commissioner Cornwell seconded, and the motion carried 5-0 to approve the December 3, 2012 Consent Agenda.**

3. 2nd PUBLIC HEARING BROWNFIELDS DESIGNATION
This is a second public hearing to designate a portion of the CRA district as a brownfields area, to be called the "Palmetto Economic Enhancement District."

Mayor Bryant opened the public hearing.

A) RESOLUTION NO. 2012-39
A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF PALMETTO, FLORIDA, DESIGNATING THE AREA FOR INCLUSION WITHIN THE PALMETTO COMMUNITY REDEVELOPMENT DISTRICT AS A BROWNFIELD AREA FOR THE PURPOSE OF ENVIRONMENTAL REMEDIATION, REHABILITATION AND ECONOMIC REDEVELOPMENT; AUTHORIZING THE CITY CLERK TO NOTIFY THE FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION OF SAID DESIGNATION AS REQUIRED; AND PROVIDING FOR AN EFFECTIVE DATE.

The following people spoke with concerns regarding residents not having enough information about the designation of brownfields:

- Ellen Leonard
- Chris Kelly

Mr. Burton explained that the brownfield redevelopment program would make property owners in the brownfield eligible for grants, tax credits, and other benefits.

Mayor Bryant closed the public hearing after no further public comment.

Motion: **Commissioner Smith moved, Commissioner Williams seconded the motion to adopt Resolution No. 2012-39 with exemptions requested by five property owners for six pid numbers:**
Audrey Fedeles, 257 Melody Lane, Property ID# 2799611807
Michael Fleming, 246 Palm Lane, Property ID# 2799610957
Stephen Guzman, 1250 U.S. 301, Property ID# 2582500134 and #258500159
Keith Stephen, 263 Meloday Lane, Property ID# 2799611500
Richard & Joan Hickson, 171 4th Street West, Property ID# 2799605601

Mr. Burton explained that property owners can come forward at any time to remove their property from the brownfields area. Those properties that have been removed can also have their property designated as a brownfields at a later date if they choose.

Commissioner Williams would like to see a flyer sent out to residents explaining the brownfields process.

Commissioner Davis opined that a community meeting could be beneficial to further educate the residents on what a brownfield is.

Motion on the floor carried 5-0.
Mr. Burton said he will mail fact sheets about the program to residents and hold a community meeting sometime in February.

4. EXTENSION OF THE TEMPORARY OR PORTABLE FOOD VENDORS MORATORIUM-RESOLUTION NO. 2012-40
A RESOLUTION OF THE CITY COMMISSION FOR THE CITY OF PALMETTO, FLORIDA EXTENDING THE MORATORIUM AS TO THE FILING AND/OR PROCESSING OF APPLICATIONS FOR TEMPORARY AND PORTABLE FOOD VENDORS ADOPTED PURSUANT TO ORDINANCE 2012-08; PROVIDING THAT SAID MORATORIUM SHALL

BE IN EFFECT ENDING JUNE 30, 2013 OR SHALL TERMINATE ON THE EFFECTIVE DATE OF THE CITY'S ADOPTION OF LAND USE AND DEVELOPMENT REGULATIONS TO REGULATE TEMPORARY AND PORTABLE FOOD VENDORS; AND PROVIDING AN EFFECTIVE DATE.

Attorney Barnebey explained that this is a resolution to extend the moratorium for another six months while he works on drafting a new ordinance regarding temporary and portable food vendors.

Motion: **Commissioner Cornwell moved, Commissioner Varnadore seconded, and the motion carried 5-0 to adopt Resolution No. 2012-40 extending the moratorium on temporary or portable food vendors for six (6) additional months ending June 30, 2013.**

Mayor Bryant recessed the City Commission meeting at 8:09 p.m. to open the December 3, 2012 CRA Board meeting

Mayor Bryant reconvened the City Commission meeting at 8:22 p.m.

Commissioner Smith entered the meeting at 8:22 p.m.

5. BASEBALL FIELD UPDATE
Mr. Vargas informed Commission that a site plan should be coming to them at the first meeting in 2013.

6. ASR WELL UPDATE
Mr. Vargas stated the subcontractor has drilled down 280 feet of the main well. The main well will be drilled to a depth of 525 feet. He has met with the engineer and is happy with the progress.

7. DEPARTMENT HEADS' COMMENTS
Mr. Barnebey—Received a draft agreement for the ball fields last Friday. He is in the process of reviewing that and will be bringing it to Commission shortly.

He has sent out an email to Mr. Freeman and Mr. Tusing regarding a new case that came out related to utility collections and the City's ability to require the property owner to maintain utility accounts rather than tenants.

Chief Wells—Congratulated the Mayor on another four-year term.

Mr. Freeman—Staff is still working on determining a usage fee for the use of electricity on 5th Street. He is proposing a $25 dollar usage fee for the First Friday's event on December 7th. He is working with FPL to determine the actual usage fee and will have a better estimate of the cost to the City after the event on the 7th. The Special Function Permit will then be modified with the actual usage fee.

Staff is going to be purchasing iPads to create a paperless work environment. Agenda books will no longer be created once the iPad is in place. The goal is to have them for the January meeting. Mr. Freeman will be using funds from the IT Department and City Commission with a cost of approximately $7,100.00.

Mr. Freeman reminded Commission of the special PBA meeting on December 18th at 5:30 p.m.

He congratulated the Mayor on another four-year term

Mr. Vargas—Congratulated the Mayor on her reelection.

8. MAYOR'S REPORT
Mayor Bryant informed Commission of the Mobile Home Park Community Meeting dates.

She stated that she attended the Christmas in the Park event on Friday, and it was a success. She read a card from a citizen that stated he was very pleased with the Christmas in the Park event.

Mayor Bryant said it has been a pleasure working with everyone, and she looks forward to working another four years with everyone.

9. COMMISSIONERS' COMMENTS

Commissioner Varnadore—Has received requests from citizens on the development of a dog park. Mr. Burton stated that the CRA could enhance Taylor Park located on 7th Street. He will bring more information back to Commission.

Stated she received an email from County Commissioner Whitmore regarding a meeting to be held in Alabama by the Gulf Coast Ecosystem Restoration Council. The meeting will be to discuss the allocation of funds related to the Deepwater Horizon oil spill. She asked that staff follow up with this email and inform Commission what information they find out related to the fund allocation.

Commissioner Williams—Would like to see a letter sent to the County regarding the membership requirements for the Tourist Development Council. He would like to have the County add a requirement for an elected official from the City of Palmetto be on the Council.

Commissioner Davis—Suggested that the Commission draft a letter to the County addressing the fact that they are not pleased with the rebranding of the Manatee County Civic Center. Mayor Bryant said she will write a letter and have each Commissioner sign it.

Commissioner Davis congratulated the Mayor on her reelection.

Commissioner Cornwell—Thanked the Mayor for her positive comments she made tonight during her opening statement.

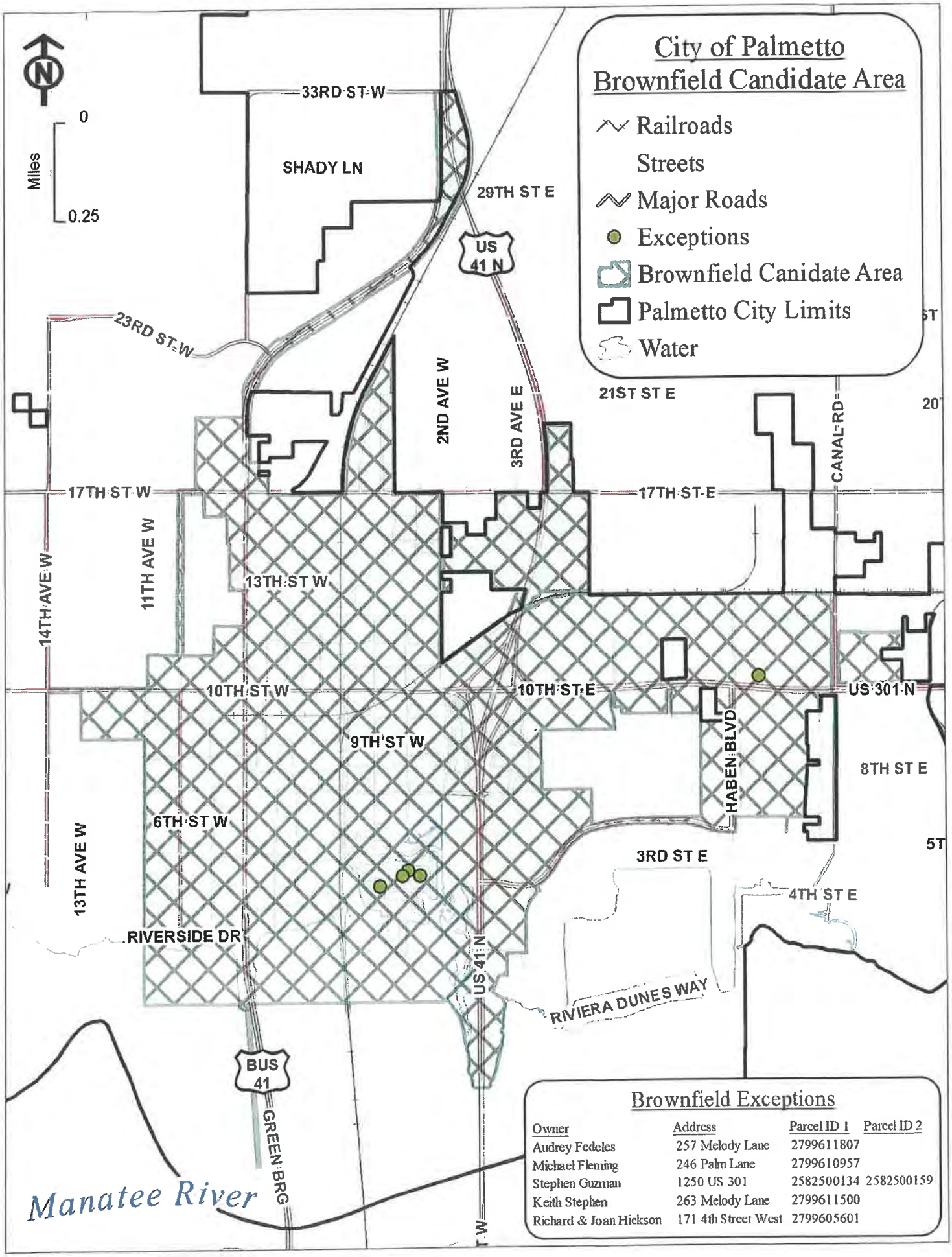
Commissioner Smith—Congratulated the Mayor on four more years.

Mayor Bryant adjourned the meeting at 8:54 p.m.

Minutes approved: January 7, 2013

James R. Freeman

James R. Freeman
City Clerk



Brownfield Exceptions

Owner	Address	Parcel ID 1	Parcel ID 2
Audrey Fedeles	257 Melody Lane	2799611807	
Michael Fleming	246 Palm Lane	2799610957	
Stephen Guzman	1250 US 301	2582500134	2582500159
Keith Stephen	263 Melody Lane	2799611500	
Richard & Joan Hickson	171 4th Street West	2799605601	

Site No. 50

Riviera Dunes Marina Condo Association

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/24/2026 Last Data Refresh: 03/23/2026 Report Generated from DOPPLER

District Southwest

County Manatee

ID 9804458

Name RIVIERA DUNES MARINA CONDO ASSOCN
102 RIVIERA DUNES WAY
PALMETTO, FL 34221

Contact CAPT DOC CRAIG

Phone (941) 981-5330

Type Marine/Coastal Fuel Storage

Status OPEN

Latitude 27° 30' 41.8366

Longitude 82° 33' 37.0681

LL Method DGPS

LL Status REVIEWED

Status Date 11/04/2003

Account Owner Information

Name RIVIERA DUNES MARINA CONDO ASSOCN
102 RIVIERA DUNES WAY
PALMETTO, FL 34221

Contact VOORHEES A CRAIG - HARBORMASTER

Phone (941) 981-5330

Email PEGGY@RDMARINA.COM

Effective Date 09/29/2011

Placard # / Date 710979 - 05/30/2025

No Property Owner Information Found

Tank	Tank Size	Content	Installed	Placement	Status
1	12000	Vehicular Diesel (D)	01/01/2001	ABOVEGROUND	In Service (U)

Constructions **Pipings** **Monitorings**

(A) Ball check valve
(C) Steel
(I) Double wall
(L) Compartmented
(M) Spill containment bucket
(N) Flow shut-Off
(O) Tight fill
(P) Level gauges/alarms

(B) Steel/galvanized metal
(F) Double wall
(J) Pressurized piping system
(K) Dispenser liners
(M) Double wall - pipe jacket
(N) Approved synthetic material

(2) Visual inspect pipe sumps
(4) Visual inspect dispenser liners
(F) Monitor dbl wall tank space
(K) Monitor dbl wall pipe space
(Q) Visual inspection of ASTs

Insurance Documents

FR Type	Effective Date	Expiration Date	Company Name
INSURANCE	12/01/2022	12/01/2023	ACE AMERICAN INSURANCE COMPANY
INSURANCE	12/01/2021	12/01/2022	ACE AMERICAN INSURANCE COMPANY
INSURANCE	12/01/2020	12/01/2021	ACE AMERICAN INSURANCE COMPANY
INSURANCE	12/01/2019	12/01/2020	ACE AMERICAN INSURANCE COMPANY
INSURANCE	12/01/2018	12/01/2019	ACE AMERICAN INSURANCE COMPANY
INSURANCE	12/01/2017	12/01/2018	ACE
INSURANCE	12/01/2016	12/01/2017	COMMERCE & INDUSTRY
INSURANCE	12/01/2015	12/01/2016	COMMERCE & INDUSTRY
INSURANCE	12/01/2012	12/01/2013	COMMERCE & INDUSTRY
INSURANCE	12/06/2011	12/06/2012	COMMERCE & INDUSTRY
INSURANCE	08/18/2010	08/18/2011	COMMERCE & INDUSTRY
INSURANCE	08/18/2009	08/18/2010	COMMERCE & INDUSTRY
INSURANCE	08/18/2008	08/18/2009	COMMERCE & INDUSTRY

System Tests

Type	Due Date
INTEGRITY TEST - PIPING SUMP	02/07/2026
INTEGRITY TEST - DISPENSER SUMP	02/07/2023
ANNUAL OPERABILITY - OVERFILL PROTECTION	02/07/2024
ANNUAL OPERABILITY - OVERFILL PROTECTION	02/07/2024
ANNUAL OPERABILITY - LINE LEAK DETECTOR	11/18/2022
ANNUAL OPERABILITY - LINE LEAK DETECTOR	11/18/2022

Legacy Compliance Activity Information

Activity Code	Date Initiated	Date Completed	Results	Inspector	AST/UST Count	Description

RRBD	01/27/2006	01/27/2006		MARK TRETHEWEY	1/0	COMPLIANCE ASSURANCE
TCI	01/05/2006	01/06/2006	MINOR OUT-OF-COMPLIANCE	MARK TRETHEWEY	1/0	COMPLIANCE ASSURANCE
TCI	01/31/2005	01/31/2005	IN-COMPLIANCE	MARK TRETHEWEY	1/0	COMPLIANCE ASSURANCE
	Completion Notes IN COMPLIANCE					
RRBD	02/05/2004	02/10/2004				COMPLIANCE ASSURANCE
TCI	11/03/2003	12/04/2003	MINOR OUT-OF-COMPLIANCE	SEGO	1/0	COMPLIANCE ASSURANCE
TCI	05/30/2003	06/04/2003	IN-COMPLIANCE	SEGO	1/0	COMPLIANCE ASSURANCE
TIN	06/21/2002	06/24/2002	IN-COMPLIANCE	PANIK	0/1	COMPLIANCE ASSURANCE

Compliance Activity Information

Activity Code	Date Completed	Results	Inspector	AST/UST Count	Description
Letter	03/15/2023	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Record Document	03/15/2023	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Site Inspection	12/15/2022	Minor Out of Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Issue Document	12/15/2022	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Letter	12/15/2022	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Electronic Communication	06/04/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Record Document	06/04/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Site Inspection	12/31/2019	Minor Out of Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Issue Document	12/31/2019	Satisfied	TRETHEWEY_MB_1		Routine Compliance

Letter	12/31/2019	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	12/12/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	12/12/2017	In Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Issue Document	12/12/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	12/15/2015	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	12/15/2015	In Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Issue Document	12/15/2015	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	11/18/2013	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	11/18/2013	In Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Site Inspection	11/27/2012	In Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Site Inspection	12/09/2011	In Compliance	MASON_RS_1	1/0	Routine Compliance
Site Inspection	01/06/2011	In Compliance	MASON_RS_1	1/0	Routine Compliance
Site Inspection	12/29/2009	In Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Issue Document	03/02/2009	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	02/03/2009	Major Out of Compliance	MARSH_L	1/0	QA/QC
Letter	02/03/2009	Satisfied	MARSH_L		Non-Compliance
Site Inspection	12/23/2008	In Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Site Inspection	12/14/2007	In Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Site Inspection	12/14/2006	In Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance

No Open AOCs Found

No Open Violations Found

No Discharges Found

MANATEE COUNTY
FLORIDA

3/15/2023

Mr. Bill Chamberlain
Riviera Dunes Marina Condo Association
102 Riviera Dunes Way
Palmetto, FL 34221

RE: Return to Compliance
Riviera Dunes Marina, 102 Riviera Dunes Way, Palmetto, FL 342021
Facility #419804458

Dear Mr. Chamberlain:

Manatee County Natural Resources Dept., contracted with Hillsborough County for the Florida Department of Environmental Protection, issued a Compliance Assistance Offer letter to the above-referenced facility on 12/15/2022. Based on the information provided 2/27/2023, the facility was determined to have returned to compliance with the Department's Storage Tank rules and regulations.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Mark Trethewey at 941-742-5980 X1880 / or mark.trethewey@mymanatee.org

Sincerely,

M Trethewey

Mark Trethewey
Senior Environmental Specialist
Natural Resources Department
Environmental Protection Division

JAMES SATCHER * AMANDA BALLARD * KEVIN VAN OSTENBRIDGE * MIKE RAHN * VANESSA BAUGH * JASON BEARDEN * GEORGE W. KRUSE
District 1 *District 2* *District 3* *District 4* *District 5* *At Large* *At Large*

Site No. 51

102 1st Street East Property

A15 **102 1ST STREET EAST** **US BROWNFIELDS** **1024246766**
North **1ST STREET EAST** **N/A**
< 1/8 **PALMETTO, FL 34221**
0.008 mi.
44 ft. **Site 3 of 3 in cluster A**

Relative: US BROWNFIELDS:
Lower

Name:	102 1ST STREET EAST
Address:	1ST STREET EAST
Recipient name:	Manatee County Board of Commissioners
Grant type:	Assessment
Property Number:	2581600809
Parcel size:	1
Latitude:	27.5116678657091
Longitude:	-82.562766492065407
Highlights:	A Phase I ESA completed in February 2018 revealed no RECs in relation to this property. Former Use: Undeveloped, vacant land
Start Date:	-
Redev Completition Date:	-
Completed Date:	-
Acres Cleaned Up:	-
Cleanup Funding:	-
Cleanup Funding Source:	-
Assessment Funding:	3500
Assessment Funding Source:	-
Redevelopment Funding:	-
Redev. Funding Source:	-
Redev. Funding Entity Name:	-
Redevelopment Start Date:	-
Assessment Funding Entity:	EPA
Cleanup Funding Entity:	-
Grant Type:	Hazardous & Petroleum
Accomplishment Type:	Phase I Environmental Assessment
Cooperative Agreement Number:	Not reported
Start Date:	2/1/2018
Ownership Entity:	Private
Completion Date:	2/20/2018
Current Owner:	-
Cleanup Required:	N
Video Available:	N
Photo Available:	Y
Institutional Controls Required:	N
IC Category Proprietary Controls:	-
IC Cat. Info. Devices:	-
IC Cat. Gov. Controls:	-
IC Cat. Enforcement Permit Tools:	-
IC in place date:	-
IC in place:	N
State/tribal program date:	-
State/tribal program ID:	-
Contaminant Found:	Not reported
Contaminant Cleanup:	Not reported
Media Affected:	Not reported
Media Cleanup:	Not reported
Num. of cleanup and re-dev. jobs:	-
Past use greenspace acreage:	-
Past use residential acreage:	-
Past use commercial acreage:	-
Past use industrial acreage:	-
Future use greenspace acreage:	-

Actual:
4 ft.

Future use residential acreage:	-
Future use commercial acreage:	-
Future use industrial acreage:	-
Future Use: Multistory	-
Past Use: Multistory	-
Property Description:	Undeveloped, vacant land
Below Poverty Number:	173
Below Poverty Percent:	21.63
Meidan Income:	1407
Meidan Income Number:	374
Meidan Income Percent:	46.75
Vacant Housing Number:	206
Vacant Housing Percent:	35.39
Unemployed Number:	43
Unemployed Percent:	5.38
Name:	102 1ST STREET EAST
Address:	1ST STREET EAST
Recipient name:	Manatee County Board of Commissioners
Grant type:	Assessment
Property Number:	2581600809
Parcel size:	1
Latitude:	27.5116678657091
Longitude:	-82.562766492065407
Highlights:	A Phase I ESA completed in February 2018 revealed no RECs in relation to this property. Former Use: Undeveloped, vacant land
Start Date:	-
Redev Completition Date:	-
Completed Date:	-
Acres Cleaned Up:	-
Cleanup Funding:	-
Cleanup Funding Source:	-
Assessment Funding:	-
Assessment Funding Source:	-
Redevelopment Funding:	-
Redev. Funding Source:	-
Redev. Funding Entity Name:	-
Redevelopment Start Date:	-
Assessment Funding Entity:	-
Cleanup Funding Entity:	-
Grant Type:	Hazardous & Petroleum
Accomplishment Type:	-
Cooperative Agreement Number:	Not reported
Start Date:	-
Ownership Entity:	Private
Completion Date:	-
Current Owner:	-
Cleanup Required:	N
Video Available:	N
Photo Available:	Y
Institutional Controls Required:	N
IC Category Proprietary Controls:	-
IC Cat. Info. Devices:	-
IC Cat. Gov. Controls:	-
IC Cat. Enforcement Permit Tools:	-
IC in place date:	-
IC in place:	N
State/tribal program date:	-
State/tribal program ID:	-

Contaminant Found:	Not reported
Contaminant Cleanup:	Not reported
Media Affected:	Not reported
Media Cleanup:	Not reported
Num. of cleanup and re-dev. jobs:	-
Past use greenspace acreage:	-
Past use residential acreage:	-
Past use commercial acreage:	-
Past use industrial acreage:	-
Future use greenspace acreage:	-
Future use residential acreage:	-
Future use commercial acreage:	-
Future use industrial acreage:	-
Future Use: Multistory	-
Past Use: Multistory	-
Property Description:	Undeveloped, vacant land
Below Poverty Number:	173
Below Poverty Percent:	21.63
Meidan Income:	1407
Meidan Income Number:	374
Meidan Income Percent:	46.75
Vacant Housing Number:	206
Vacant Housing Percent:	35.39
Unemployed Number:	43
Unemployed Percent:	5.38

Site No. 52

7-Eleven Food Store #33110

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/24/2026 Last Data Refresh: 03/23/2026 Report Generated from DOPPLER

District	Southwest	**Type**	Retail Station
County	Manatee	**Status**	OPEN
ID	9804045	**Latitude**	27° 30' 49.32
Name	7-ELEVEN FOOD STORE #33110 208 US HWY 41 PALMETTO, FL 34221	**Longitude** **LL Method**	82° 33' 45.24 DPHO
Contact	CATHY WISE	**LL Status**	REVIEWED
Phone	(407) 532-2037	**Status Date**	08/01/2006

Account Owner Information

Name	7-ELEVEN INC. PO BOX 711 Dallas, TX 75221-711	**Effective Date**	07/18/2001
Contact	DAVID PETERSEN | MILEI AVILES | JENNIFER DART		
Phone	(407) 403-2995		
Email	DAVID.PETERSEN@7-11.COM	**Placard # / Date**	711774 - 05/30/2025

Property Owner Information

Name	HOGAN HILLSBOROUGH LC 101 E KENNEDY BLVD TAMPA, FL 33602-5152	**Effective Date**	07/18/2001
Contact	SCAFFE, MARK		
Phone	(813) 274-0505		
Email	CATHY.WISE@7-11.COM		

Tank	Tank Size	Content	Installed	Placement	Status
1	15000	Unleaded Gas (B)	07/01/2001	UNDERGROUND	In Service (U)

Constructions
(A) Ball check valve
(E) Fiberglass
(I) Double wall
(M) Spill containment bucket
(N) Flow shut-Off
(O) Tight fill
(P) Level gauges/alarms

Pipings
(J) Pressurized piping system
(K) Dispenser liners
(M) Double wall - pipe jacket
(N) Approved synthetic material

Monitorings
(2) Visual inspect pipe sumps
(3) Electronic monitor pipe sumps
(4) Visual inspect dispenser liners
(F) Monitor dbl wall tank space
(H) Mechanical line leak detector
(K) Monitor dbl wall pipe space

Tank	Tank Size	Content	Installed	Placement	Status
2	10000	Unleaded Gas (B)	07/01/2001	UNDERGROUND	In Service (U)

Constructions
(A) Ball check valve
(E) Fiberglass
(I) Double wall
(M) Spill containment bucket
(N) Flow shut-Off
(O) Tight fill
(P) Level gauges/alarms

Pipings
(J) Pressurized piping system
(K) Dispenser liners
(M) Double wall - pipe jacket
(N) Approved synthetic material

Monitorings
(2) Visual inspect pipe sumps
(3) Electronic monitor pipe sumps
(4) Visual inspect dispenser liners
(F) Monitor dbl wall tank space
(H) Mechanical line leak detector
(K) Monitor dbl wall pipe space

Tank	Tank Size	Content	Installed	Placement	Status
3	10000	Vehicular Diesel (D)	07/01/2001	UNDERGROUND	In Service (U)

Constructions
(A) Ball check valve
(E) Fiberglass
(I) Double wall
(M) Spill containment bucket
(N) Flow shut-Off
(O) Tight fill
(P) Level gauges/alarms

Pipings
(J) Pressurized piping system
(K) Dispenser liners
(M) Double wall - pipe jacket
(N) Approved synthetic material

Monitorings
(2) Visual inspect pipe sumps
(3) Electronic monitor pipe sumps
(4) Visual inspect dispenser liners
(F) Monitor dbl wall tank space
(H) Mechanical line leak detector
(K) Monitor dbl wall pipe space

Insurance Documents

FR Type	Effective Date	Expiration Date	Company Name
INSURANCE	12/18/2021	12/18/2022	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	12/18/2020	12/18/2021	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	12/18/2020	12/18/2024	IRONSHORE SPECIALTY INSURANCE COMPANY
INSURANCE	12/18/2019	12/18/2020	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	12/18/2018	12/18/2019	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	12/18/2017	12/18/2018	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	12/18/2016	12/18/2017	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	12/18/2015	12/18/2016	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	12/18/2014	12/18/2015	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	12/18/2013	12/18/2014	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	12/18/2012	12/18/2013	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	04/30/2012	12/18/2012	IRONSHORE SPECIALTY INSURANCE CO
INSURANCE	04/30/2011	04/30/2012	ILLINOIS UNION
INSURANCE	04/30/2010	04/30/2011	ILLINOIS UNION
INSURANCE	04/30/2009	04/30/2010	ILLINOIS UNION

System Tests

Type	Due Date
INTEGRITY TEST - STP SUMP	10/12/2025
INTEGRITY TEST - DISPENSER SUMP	10/12/2022
INTEGRITY TEST - DISPENSER SUMP	10/12/2025
INTEGRITY TEST - DISPENSER SUMP	03/14/2026
INTEGRITY TEST - DOUBLE-WALLED SPILL BUCKET	10/12/2025
ANNUAL OPERABILITY - RELEASE DETECTION	02/04/2023
ANNUAL OPERABILITY - RELEASE DETECTION	01/06/2024
ANNUAL OPERABILITY - RELEASE DETECTION	01/11/2025
ANNUAL OPERABILITY - OVERFILL PROTECTION	01/26/2023
ANNUAL OPERABILITY - OVERFILL PROTECTION	01/11/2025

ANNUAL OPERABILITY - OVERFILL PROTECTION	01/06/2024
ANNUAL OPERABILITY - LINE LEAK DETECTOR	01/26/2023
ANNUAL OPERABILITY - LINE LEAK DETECTOR	01/11/2025
ANNUAL OPERABILITY - LINE LEAK DETECTOR	01/06/2024

Legacy Compliance Activity Information

Activity Code	Date Initiated	Date Completed	Results	Inspector	AST/UST Count	Description
RRBD	01/26/2006	01/27/2006		REEDER_J	0/0	DISCHARGE PROJECT
	Completion Notes RECEIVED VAPOR BUCKET CLOSURE REPORT. VAPOR LINES AND BUCKETS NOT REGULATED BY 62-761. REPORT COPIED TO DEP/TAMPA AS PART OF ON-GOING CLEANUP.					
RRBD	12/27/2005	12/28/2005		REEDER_J	0/0	DISCHARGE PROJECT
	Completion Notes REGULAR AND PREMIUM VAPOR RECOVERY SUMPS REPLACED - NOT REGULATED BY 62-761.					
IRFR	11/07/2005	11/08/2005		REEDER_J	0/0	DISCHARGE PROJECT
	Completion Notes REGULAR AND PREMIUM VAPOR RECOVERY SUMPS SPLIT - NOT REGULATED BY 62-761.					
TCI	09/06/2005	09/08/2005	IN-COMPLIANCE	MARK TRETHEWEY	0/3	COMPLIANCE ASSURANCE
TCI	07/06/2004	07/06/2004	IN-COMPLIANCE	SEGO	0/3	COMPLIANCE ASSURANCE
TCI	07/08/2003	07/28/2003	IN-COMPLIANCE	SEGO	0/3	COMPLIANCE ASSURANCE
TCR	04/02/2003	04/23/2003	IN-COMPLIANCE	SEGO	0/3	COMPLIANCE ASSURANCE
TCI	02/04/2003	02/21/2003	MINOR OUT-OF-COMPLIANCE	SEGO	0/3	COMPLIANCE ASSURANCE
TIN	12/27/2001	01/04/2002	IN-COMPLIANCE	POUSO	0/3	COMPLIANCE ASSURANCE

Compliance Activity Information

Activity Code	Date Completed	Results	Inspector	AST/UST Count	Description
Record Document	08/26/2024	Satisfied	SHANBERG_VJ_1		Compliance Assistance
Letter	08/26/2024	Satisfied	SHANBERG_VJ_1		Compliance Assistance
Letter	08/13/2024	Satisfied	SHANBERG_VJ_1		Compliance Assistance
Site Inspection	08/13/2024	Major Out of Compliance	SHANBERG_VJ_1	0/3	Routine Compliance
Issue Document	08/13/2024	Satisfied	SHANBERG_VJ_1		Routine Compliance
Letter	10/06/2022	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	10/06/2022	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	10/06/2022	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Site Inspection	09/16/2020	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Issue Document	09/16/2020	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	09/16/2020	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	07/19/2018	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Issue Document	07/19/2018	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	07/19/2018	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Document Management	03/08/2017	Satisfied	TRETHEWEY_MB_1		Incident
Incident	03/08/2017	Has not led to Discharge	TRETHEWEY_MB_1		Incident
Issue Document	07/20/2016	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	07/20/2016	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Issue Document	07/20/2016	Satisfied	TRETHEWEY_MB_1		Routine Compliance

Issue Document	08/19/2014	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	08/19/2014	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	08/18/2014	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Site Inspection	11/15/2012	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Site Inspection	11/30/2011	In Compliance	MASON_RS_1	0/3	Routine Compliance
Site Inspection	10/28/2010	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Site Inspection	10/21/2009	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Site Inspection	10/20/2008	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Site Inspection	10/03/2007	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Emergency Preparedness Information	05/21/2007	Satisfied	REEDER_JH_1		Routine Compliance
Record Document	03/09/2007	Satisfied	REEDER_JH_1		Non-Compliance
Record Document	03/07/2007	Satisfied	REEDER_JH_1		Non-Compliance
Emergency Preparedness Information	02/14/2007	Satisfied	REEDER_JH_1		Routine Compliance
Site Inspection	10/30/2006	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Emergency Preparedness Information	09/22/2006	Satisfied	REEDER_JH_1		Routine Compliance
Record Document	08/10/2006	Satisfied	REEDER_JH_1		Installation
Site Inspection	08/01/2006	In Compliance	REEDER_JH_1	0/3	Closure
Site Inspection	08/01/2006	In Compliance	REEDER_JH_1	0/3	Installation

Record Document	07/12/2006	Satisfied	REEDER_JH_1	Discharge

No Open AOCs Found

No Open Violations Found

Discharge Information

Discharge Date	Clean Up Status	Score	Eligibility Info	Site Manager	Phone
02/16/2004	COMPLETED	6			

Site Assessment Report

Non-Program Site
7-Eleven Store No. 33119
208 U.S. Highway 41
Palmetto, Florida

FDEP Facility ID No. 419804045

August 12, 2004



Prepared For:

Mr. Ken Hilliard
7-Eleven, Inc.
1300 Lee Road
Orlando, Florida 32810

Submitted To:

Laurel Culbreth
Florida Department of Environmental Protection Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Prepared By:

Shaw Environmental, Inc.
725 U. S. Highway 301 South
Tampa, Florida 33619-4349

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1 Site Location Map
2 Site Layout and Temporary Well Location Map
3 Area Land Use Map
4 Highest OVA Reading Above the Water Table
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A Limited Closure Summary Report
B Southwest Florida Water Management District Well Lists
C Temporary Well Construction Logs
D Soil and Groundwater Laboratory Report and FDEP Groundwater Sampling Logs

1.0 INTRODUCTION AND SCOPE OF WORK

Petroleum-impacted soil and groundwater were detected during replacement of the overfill buckets on the premium unleaded and diesel underground storage tanks (USTs) conducted on February 2, 2004, at 7-Eleven Store No. 33110 located at 208 U.S. Highway 41, Palmetto, Manattee County, Florida. As a result 7-Eleven, Inc. (7-Eleven) filed a Discharge Reporting Form (DRF) and contracted with Shaw Environmental, Inc. (Shaw) to conduct site assessment activities in accordance with Chapter 62-770, Florida Administrative Code. A copy of the Limited Closure Summary Report, which includes a copy of the DRF, is in **Appendix A**.

2.0 BACKGROUND

2.1 Area of Investigation

7-Eleven Store No. 33110 is located within Section 13, Township 34 South, Range 17 East of the United States Geological Survey Palmetto, Florida, Topographic Quadrangle. The site is located less than ½ mile north of the Manatee River with an average ground surface elevation of approximately 5 feet above mean sea level. A site location map is included as **Figure 1**.

The 7-Eleven retail building is located on the southeastern portion of the property. The site is primarily covered with concrete and asphalt. The current UST area is located in the northwest portion of the site adjacent to the dispenser islands. The site layout and adjacent land use are depicted on **Figure 2**.

2.2 Site Chronology

The following is a chronological summary of site assessment activities performed at the referenced facility:

- **February 2, 2004**: The premium unleaded and diesel overfill buckets were replaced at the referenced facilty. Shaw conducted environmental monitoring.
- **February 16, 2004**: 7-Eleven submitted a DRF to the Manatee County Envrionmental Management Department, following the receipt of the laboratory analyitcal report.
- **March 4, 2004**: Shaw submitted a Limited Closure Summary Report to the Manatee County Environmental Mangement Department detailing the events of the overfill bucket replacements and Shaw's intent to conduct a site assessment.
- **April 13, 2004**: Shaw supervised the installation of six temporary wells (TW-1 through TW-6) with depths ranging from 10 feet below land surface (ft bls) to 13 ft bls using direct-push drilling methods. Groundwater and soil samples were collected.
- **August 6, 2004**: Shaw supervied the installation of one temporary well (TW-7) with a depth of 8 ft bls using direct-push drilling methods. One groundwater sample was collected.

3.0 SITE ASSESSMENT ACTIVITIES AND RESULTS

3.1 Area Land Use and Water Well Survey

Shaw contacted the Southwest Florida Water Management District (SWFWMD) for records of wells within Sections 13, 14, 23, and 24 of Township 34 South, Range 17 East. Several private wells were listed by SWFWMD; however, no wells that were listed had addresses that were within ¼ mile of the subject property. Copies of the well permit lists from SWFWMD are in **Appendix B**.

Land use within ¼ mile of the facility is mainly commercial, residential, and undeveloped. The only commercial property immediately adjacent to the subject site is the Manatee Civic Center located to the north. Undeveloped property immediately bounds the property to the east, south, and west. The area land use is shown on **Figure 3**.

3.2 Initial Investigation

On February 2, 2004, Shaw conducted environmental monitoring during the replacement of the premium unleaded and diesel overfill buckets at the site. Sixteen soil samples (SB-1 through SB-12, and SS-1 through SS-4) were collected from the excavation and screened on site for total organic vapors using an organic vapor analyzer (OVA) flame-ionization detector (FID). Four soil samples (SS-1, SS-2, SS-3, and SS-4) were submitted to Severn Trent Laboratories in Pensacola, Florida, and analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX) and methyl tertiary butyl ether (MTBE) by US Environmental Protection Agency (EPA) Method 8021, for polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8310, and for total recoverable hydrocarbons (TRPH) by Florida Department of Environmental Protection (FDEP) Method FL-PRO. Laboratory results indicated that Soil Cleanup Target Levels (SCTLs) were exceeded in two samples, SS-3 and SS-4. A soil quality summary is in **Table 1**.

On February 2, 2004, one groundwater sample (GW-1) was collected from inside the open excavation and was analyzed for BTEX and MTBE by EPA Method 8021, for PAHs by EPA Method 8310, and for TRPH by FDEP Method FL-PRO. Analytical results indicated dissolved hydrocarbon concentrations exceeded Groundwater Cleanup Target Levels (GCTLs). A water quality summary is in **Table 3**. A Limited Closure Summary Report was prepared and submitted to the Manatee County Environmental Management Department on March 4, 2004, and is in **Appendix A**.

3.3 Soil Sample Collection and Results

Shaw oversaw the installation of six temporary wells (TW-1 through TW-6) on April 13, 2004, and one temporary well (TW-7) on August 6, 2004, using direct-push drilling. The wells were installed to depths between 8 ft bls and 13 ft bls. The well locations are shown on **Figure 2**. The temporary well construction logs are in **Appendix C**. During the temporary well installations, soil samples were collected every two feet to two feet into the water table. The soil samples were screened onsite using a Photovac® OVA/FID. Each soil sample was screened for methane using a carbon filter.

The net OVA results indicated that petroleum vapors above the water table ranged from less than 10 parts per million (ppm) to 794.6 ppm. Three soil samples, TW-6 at 4 ft bls, TW-1 at 2 ft bls, and TW-2 at 2 ft bls, were collected from areas with low, medium, and high OVA readings, respectively. The soil

samples were sent to Accutest Laboratories in Orlando, Florida, and analyzed for BTEX and MTBE by EPA Method 8021, for PAHs by EPA Method 8310, and for TRPH by FDEP Method FL-PRO. The laboratory results show that no SCTLs were exceeded in any sample. A summary of the soil OVA and laboratory results is in **Table 2** and a copy of the soil laboratory report is in **Appendix D**. The highest OVA reading above the water table at each soil sample location is shown on **Figure 4**.

3.4 Groundwater Sampling and Results

Shaw collected groundwater samples from the geoprobe well points (TW-1 through TW-6) on April 13, 2004, and from TW-7 on August 6, 2004, and sent them to Accutest Laboratories for analysis. Groundwater samples TW-1, TW-2, TW-3, TW-5, TW-6, and TW-7 were analyzed for BTEX and MTBE by EPA Method 8021, for PAHs by EPA Method 8310, and for TRPH by FDEP Method FL-PRO. Because of a very slow recharge rate, TW-4 was only analyzed for BTEX and MTBE by EPA Method 8021.

The analytical results indicated that dissolved hydrocarbon concentrations did not exceed any GCTLs in any location. Dissolved hydrocarbon concentrations are depicted on **Figure 5**. Groundwater quality results are summarized in **Table 3**. The groundwater laboratory reports and FDEP groundwater sampling logs for TW-1 through TW-6 are in **Appendix D**.

3.5 Site Geology

Data collected during the assessment activities indicates that alternating regressive and transgressive sequences underlie the site. Varying thicknessess of sand, clay, and limestone are interbedded to a depth of 13 ft bls. Temporary well construction and geologic logs are in **Appendix C**.

4.0 SUMMARY AND RECOMMENDATIONS

- No private wells are located within ¼ mile of the facility.
- Soil samples collected from areas with low, medium, and high OVA readings and submitted for laboratory anaysis did not exceed any SCTLs.
- Groundwater samples collected form TW-1 through TW-6 did not exceed any GCTLs.

Based on these results, Shaw recommends No Further Action at this site.

DRAWN BY	CHECKED BY	DRAWING NUMBER
SDJF 7-6-04	APPROVED BY	834355-A201

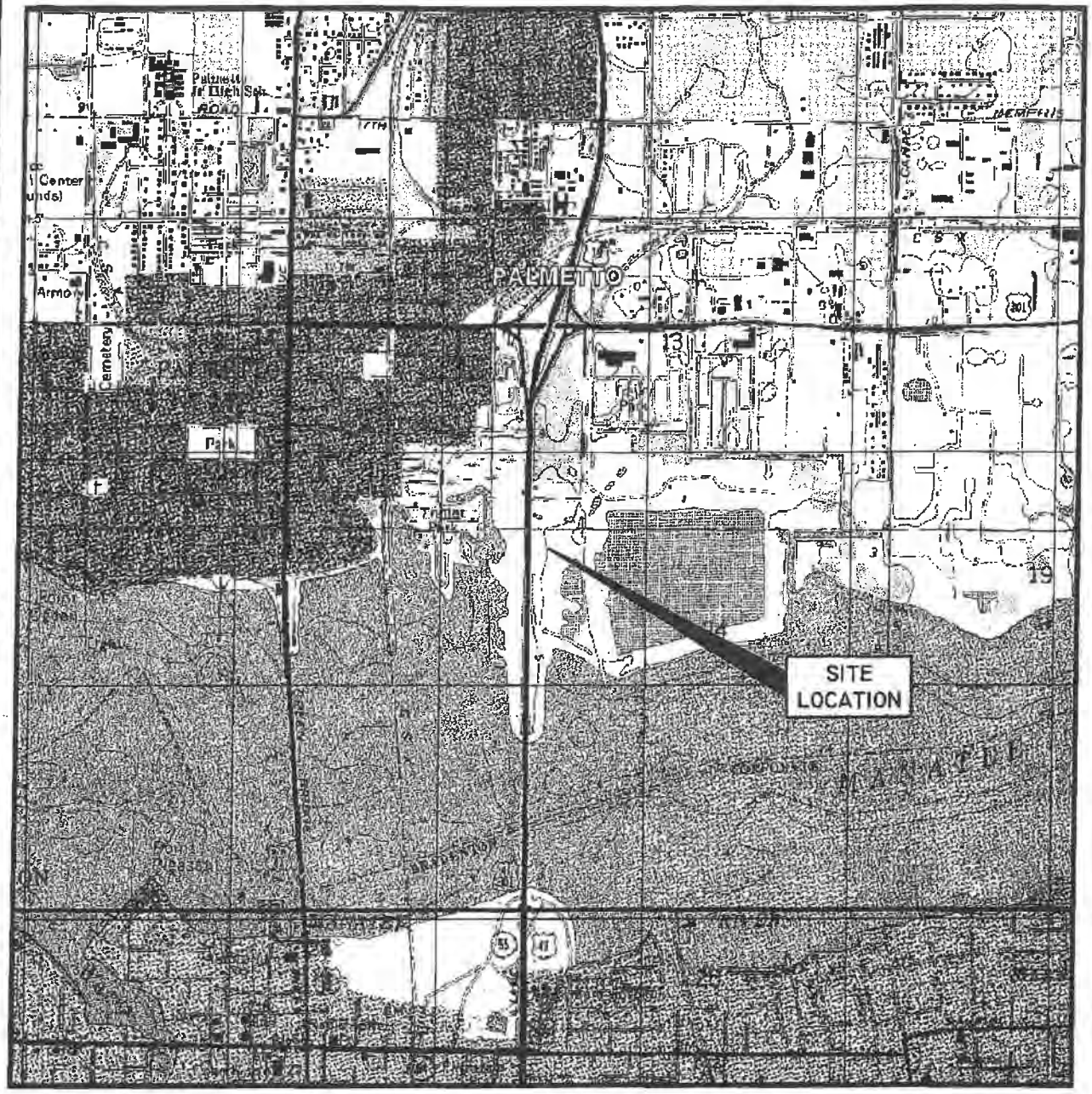


FIGURE 1

SITE LOCATION MAP
7-ELEVEN STORE No. 33110
208 U.S. HIGHWAY 41
PALMETTO, FLORIDA

PREPARED FOR

7-ELEVEN, INC.
ORLANDO, FLORIDA

REFERENCE:

7.5 MINUTE U.S.G.S. TOPOGRAPHIC QUADRANGLE MAP, PALMETTO, FLORIDA, DATED 1999.

SCALE
0 2,000 4,000 FEET

Shaw Shaw Environmental, Inc.

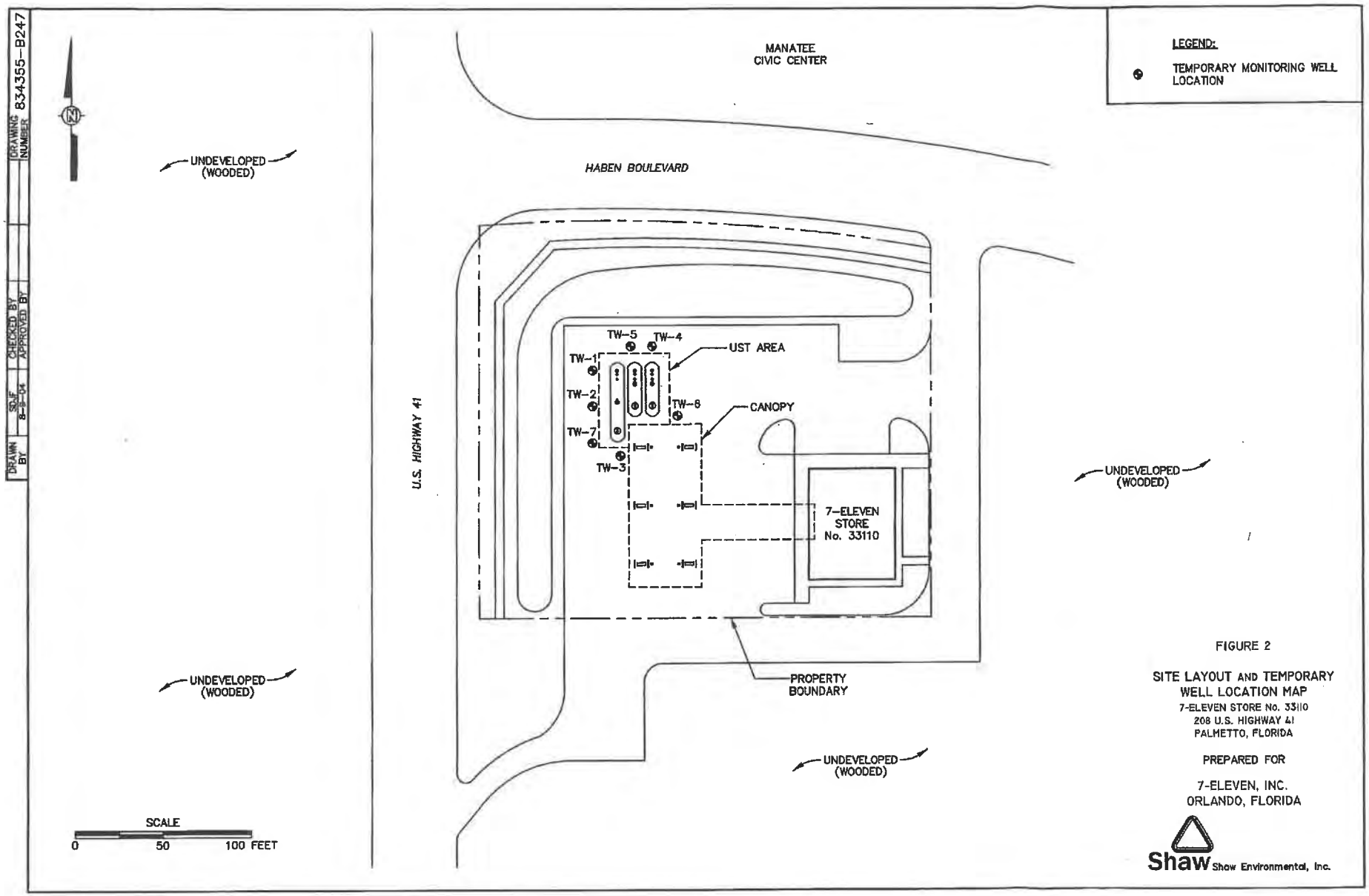


FIGURE 2

SITE LAYOUT AND TEMPORARY WELL LOCATION MAP
7-ELEVEN STORE No. 33110
208 U.S. HIGHWAY 41
PALMETTO, FLORIDA

PREPARED FOR

7-ELEVEN, INC.
ORLANDO, FLORIDA

Shaw Shaw Environmental, Inc.

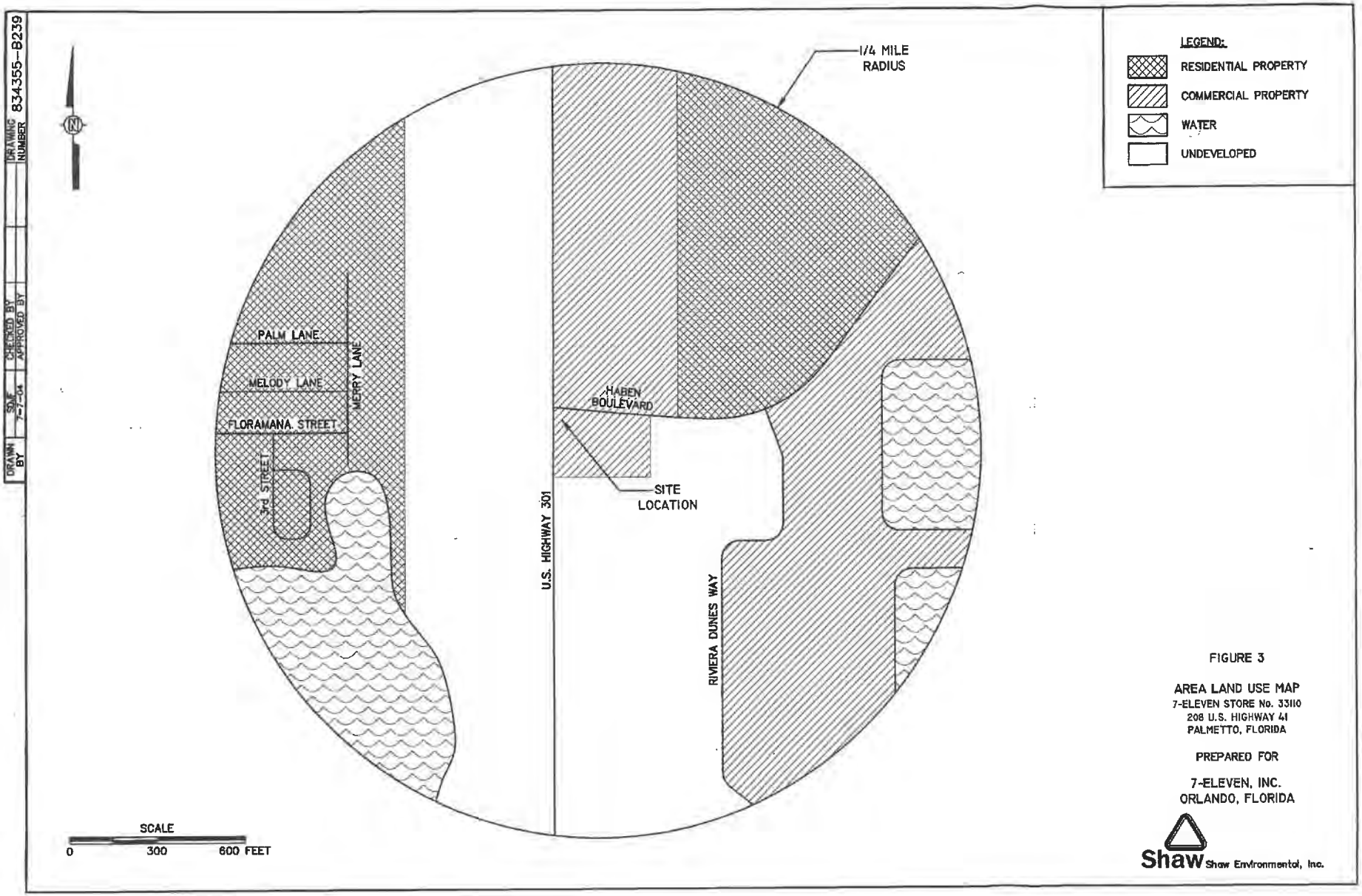


FIGURE 3

AREA LAND USE MAP
7-ELEVEN STORE No. 33110
208 U.S. HIGHWAY 41
PALMETTO, FLORIDA

PREPARED FOR

7-ELEVEN, INC.
ORLANDO, FLORIDA

Shaw Shaw Environmental, Inc.

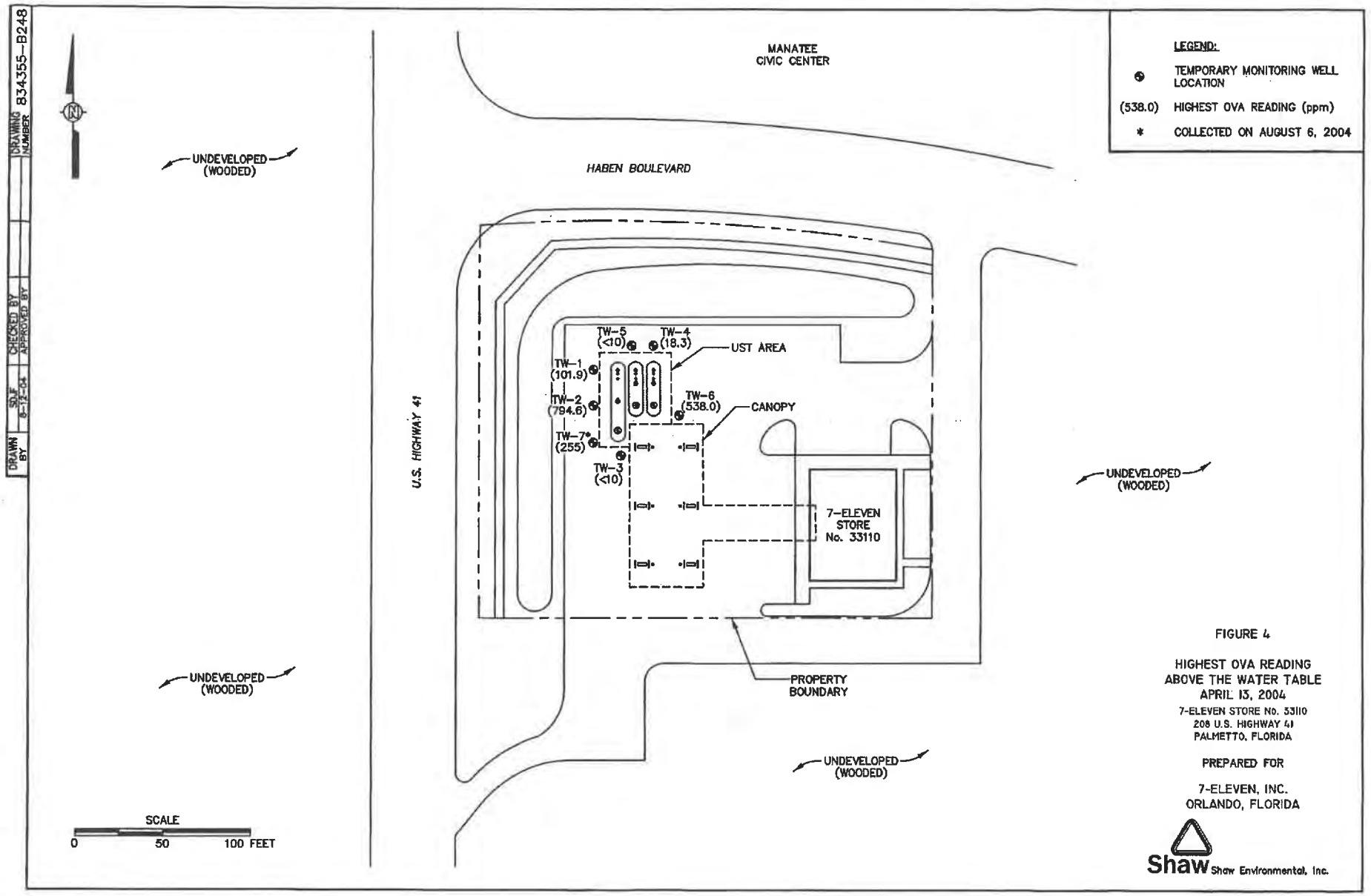


FIGURE 4

HIGHEST OVA READING
ABOVE THE WATER TABLE
APRIL 13, 2004

7-ELEVEN STORE No. 33110
208 U.S. HIGHWAY 41
PALMETTO, FLORIDA

PREPARED FOR

7-ELEVEN, INC.
ORLANDO, FLORIDA

Shaw Shaw Environmental, Inc.

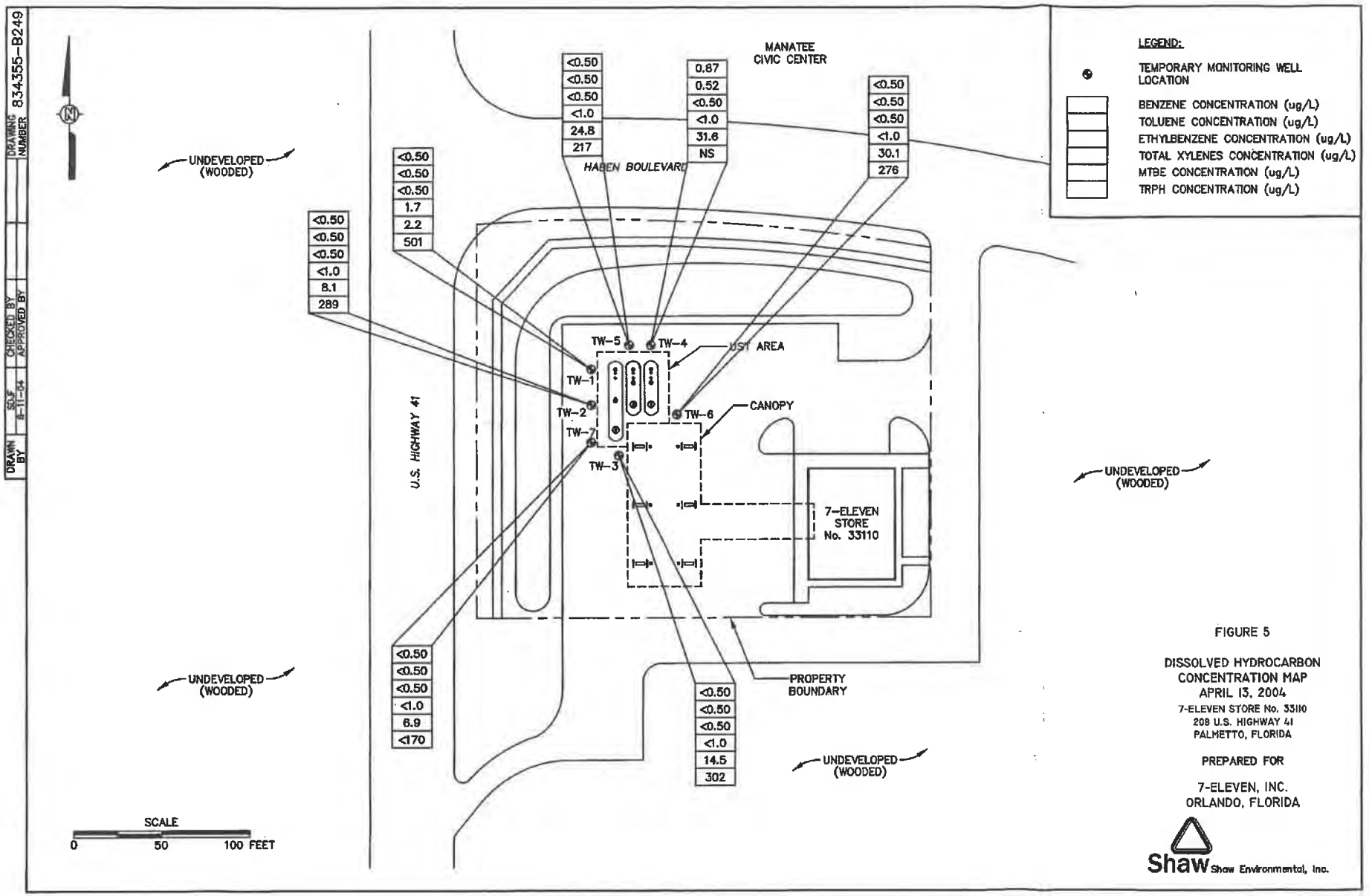


FIGURE 5

DISSOLVED HYDROCARBON CONCENTRATION MAP
APRIL 13, 2004
7-ELEVEN STORE No. 33110
208 U.S. HIGHWAY 41
PALMETTO, FLORIDA

PREPARED FOR

7-ELEVEN, INC.
ORLANDO, FLORIDA

Shaw Shaw Environmental, Inc.

Shaw Environmental, Inc.

725 U.S. Highway 301 South
Tampa, FL 33619-4349
813.626.2336
Fax: 813.626.1663

Shaw® Shaw Environmental, Inc.

November 18, 2004

Ms. Lisa Ricci
Florida Department of Environmental Protection
Southwest District
Bureau of Petroleum Storage Systems
3804 Coconut Palm Drive
Tampa, Florida 33619

RECEIVED
NOV 19 2004
Department of Environmental Protection
BY SOUTHWEST DISTRICT

Re: Site Assessment Report Response to Comments
7-Eleven Store No. 33110
208 U.S. Highway 41
Palmetto, Manatee County, Florida
FDEP Facility ID No. 419804045
Project No. 834355-33110000

Dear Ms. Ricci:

Shaw Environmental, Inc. (Shaw) submits this letter in response to the Florida Department of Environmental Protection's (FDEP) letter dated October 1, 2004. A copy of the FDEP's Site Assessment Report (SAR) letter is in **Attachment A**. The following are the responses to comments.

Comment 1: *A summary of site history and operations, including the type and length of time petroleum or specific petroleum products were stored/distributed onsite should be presented. The site history should address the status of all underground storage tanks (USTs) and above ground storage tank (AST) systems, including spill incidents. According to Department records: (1) one 15,000-gallon unleaded premium gasoline UST; (2) one 10,000-gallon unleaded gasoline UST; and, (3) one 10,000-gallon fuel UST were installed on July 1, 2001. A discharge associated with leaking overfill buckets was filed on February 16, 2004.*

Response 1: Shaw did not report the installation date of the USTs in the SAR's Site Chronology section, but did include all other applicable events that occurred after the UST installations including the filing of the Discharge Report Form on February 16, 2004.

Comment 2: *For all future site maps that are submitted, the following scaled maps should be presented: (1) site layout map; (2) soil sampling location maps showing all sampling locations; and, (3) groundwater contaminant concentration maps and groundwater flow maps, as appropriate.*

a. *The number of tanks and layout of the tanks presented in Figure 1 Soil Sample Location Map of the Limited Closure Summary Report dated March 4, 2004, differs significantly from the Figure 2 Site Layout and Temporary Well Location Map of the SAR dated August 12, 2004. Please confirm which map is correct.*

b. *A revised scaled site layout map should be presented that depicts the locations of the USTs, identifies tank contents, overfill bucket replacements, dispensers, ancillary piping and utilities with respect to property boundaries.*

c. *A scaled composite soil sampling location map should be presented that incorporates the location of the (1) 12 soil borings/ 2 soil samples/ groundwater sample GW-1 collected in February 2004; and, (2) subsequent locations of assessment soil borings/soil samples collected in April 2004.*

Response 2: a. The figure presented in the SAR is correct. See **Figure 1** for a revised map showing soil sample locations reported in the Limited Closure Summary Report (LCSR).

b. A site map showing the ancillary piping and utilities is provided as **Figure 1**.

c. There is no FDEP requirement to incorporate all soil sample locations onto one map. However, a scaled composite soil sampling location map showing the locations of all the soil borings, soil samples; and groundwater sample is provided as **Figure 1** because the map provided in the LCSR was not correct.

Comment 3: *Analysis of soil samples collected from the overfill bucket excavations in February 2004 revealed that concentrations of MTBE were detected in sample SS-3 at 3.5 feet depth at levels exceeding soil cleanup target levels (SCTLs) for leachability. Soil sample SS-3 was collected from the premium unleaded (PUL) gasoline overfill bucket excavation.*

In order to achieve closure, sites need to either achieve the SCTLs or implement institutional controls. There are no special accommodations in the rule for exceptions due to practicality considerations. Hence, consideration for institutional controls is necessary if SCTLs cannot be achieved by active remediation or natural attenuation. Please note:

> *No Further Action (NFA) with conditions may be considered by enactment of an institutional control, in conjunction with implementation of engineering controls such as permanent cover material that prevent human exposure and limit water infiltration. In which case the concentrations of contaminants of concern in soil are allowed to remain on-site may exceed the SCTL residential direct exposure levels and/or SCTL for leachability, as per Rule 62-770.680 (2)(c)4, F.A.C. If concentrations of contaminants of concern in soil exceeding SCTLs are allowed to remain on-site, then soil removal, treatment and disposal shall apply if the contaminated soil is later excavated, or exposed due to change in site conditions.*

Response 3: On October 22, 2004, 7-Eleven, Inc. (7-Eleven) and Shaw had a teleconference with Tom Conrardy from the FDEP. This teleconference consisted of questions 7-Eleven had regarding engineering and institutional controls, which Mr. Conrardy said he would look into. As of yet, some issues are still unresolved. In the meantime, 7-Eleven believes the

concrete covering the tank pit provides sufficient cover to prevent exposure to the public, and Shaw recommends proceeding with the recommendations proposed in Response 5.

Comment 4: *Analysis of groundwater sample GW-1 collected on February 2, 2004, from an overfill bucket excavation pit, revealed that concentrations of benzene, toluene, and MTBE were detected at levels exceeding groundwater cleanup target levels (GCTLs). The location where sample GW-1 (source area) was collected has not been depicted on any site layout maps.*

a. *Figure 5 Dissolved Hydrocarbon Concentration Map presented in the SAR dated August 12, 2004, should be revised to include location of groundwater source sample GW-1.*

b. *A source monitoring well should be installed.*

Response 4: a. Please see **Figure 2**.

b. A source monitor well cannot be installed directly over the premium UST for obvious reasons. Instead, Shaw proposes the installation of a downgradient monitor well.

Comment 5: *Groundwater sample logs presented in the SAR dated August 12, 2004, documenting purging of temporary well sample locations TW-1 through TW-7, are incomplete. The purge parameters were not recorded on any of the groundwater sampling logs. The instrument calibration forms were not presented for each sampling event.*

a. *Copies of field notes and instrument calibration forms for each sampling event should be provided. An explanation concerning lack of purge parameter documentation should be provided.*

b. *A permanent monitoring well should be installed around the UST system for collection of confirmatory groundwater samples for analysis.*

Response 5: a Copies of the instrument calibration logs from April 13, 2004 and August 6, 2004, are provided in **Attachment B**. The rest of the field notes, which include OVA readings and soil lithologies, have already been summarized or provided in the SAR.

No purge parameters were provided for the geoprobe well points because no readings were taken. After the temporary wells were installed they were purged until the water ran clear. It has been Shaw's experience that groundwater samples, collected from geoprobe well points in this manner, typically contain dissolved concentrations higher than samples collected with parameters from monitor wells installed in the same locations. No parameters were taken because the geoprobe events were used simply as a screening tool to determine where permanent monitor wells should be placed. After groundwater analytical results indicated no GCTLs were exceeded, it was determined that no permanent monitor wells were needed.

b. Shaw proposes the installation of one monitor well near the UST area downgradient to be sampled quarterly for 6 months, as mentioned in Comment 5.

Comment 6: *Future groundwater level measurement from all compliance/monitoring wells should be collected during each groundwater sampling event, to confirm groundwater flow direction, as appropriate.*

Response 6: No response needed.

Please contact me at (813) 612-3603 or David Petersen at (813) 612-3683 if you have any questions or comments.

Sincerely,
Shaw Environmental, Inc.

Meagen Gonzalez
Project Geologist

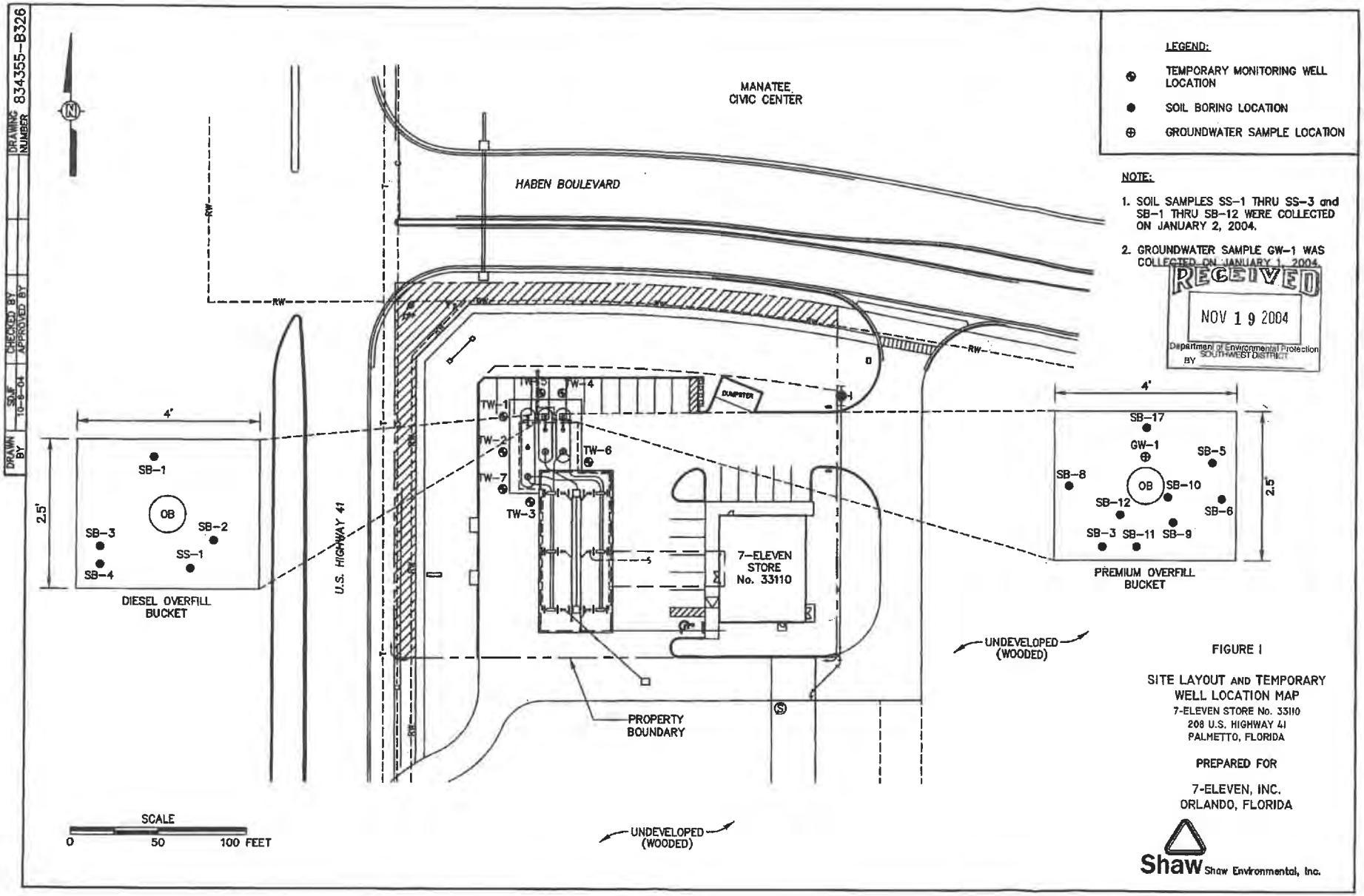
David Petersen, P.G.
State of Florida License No. 2019

Date: 11/18/04

Attachments: Figures
Attachment A—FDEP SAR Review letter dated October 1, 2004
Attachment B—Calibration Logs

cc: John Vargo, FDEP Southwest District, BPSS Cleanup Section 5
Ken Hilliard, 7-Eleven, Inc.
Jane Lomas, Shaw, Irving, TX
Tampa Project File

FIGURES


DRAWING NUMBER 834355-B326
DRAWN BY SDJF 10-6-04
CHECKED BY
APPROVED BY
LEGEND:
TEMPORARY MONITORING WELL LOCATION
SOIL BORING LOCATION
GROUNDWATER SAMPLE LOCATION
NOTE:
1. SOIL SAMPLES SS-1 THRU SS-3 and SB-1 THRU SB-12 WERE COLLECTED ON JANUARY 2, 2004.
2. GROUNDWATER SAMPLE GW-1 WAS COLLECTED ON JANUARY 1, 2004.
RECEIVED
NOV 19 2004
Department of Environmental Protection
SOUTHWEST DISTRICT
BY
MANATEE CIVIC CENTER
HABEN BOULEVARD
RW
U.S. HIGHWAY 41
DUMPSTER
TW-1
TW-2
TW-3
TW-4
TW-6
TW-7
7-ELEVEN STORE No. 33110
PROPERTY BOUNDARY
UNDEVELOPED (WOODED)
UNDEVELOPED (WOODED)
4'
2.5'
SB-1
OB
SB-2
SB-3
SS-1
SB-4
DIESEL OVERFILL BUCKET
SB-17
GW-1
SB-5
SB-8
OB
SB-10
SB-12
SB-6
SB-3
SB-11
SB-9
PREMIUM OVERFILL BUCKET
SCALE
0
50
100 FEET
FIGURE 1
SITE LAYOUT AND TEMPORARY WELL LOCATION MAP
7-ELEVEN STORE No. 33110
208 U.S. HIGHWAY 41
PALMETTO, FLORIDA
PREPARED FOR
7-ELEVEN, INC.
ORLANDO, FLORIDA
Shaw
Shaw Environmental, Inc.

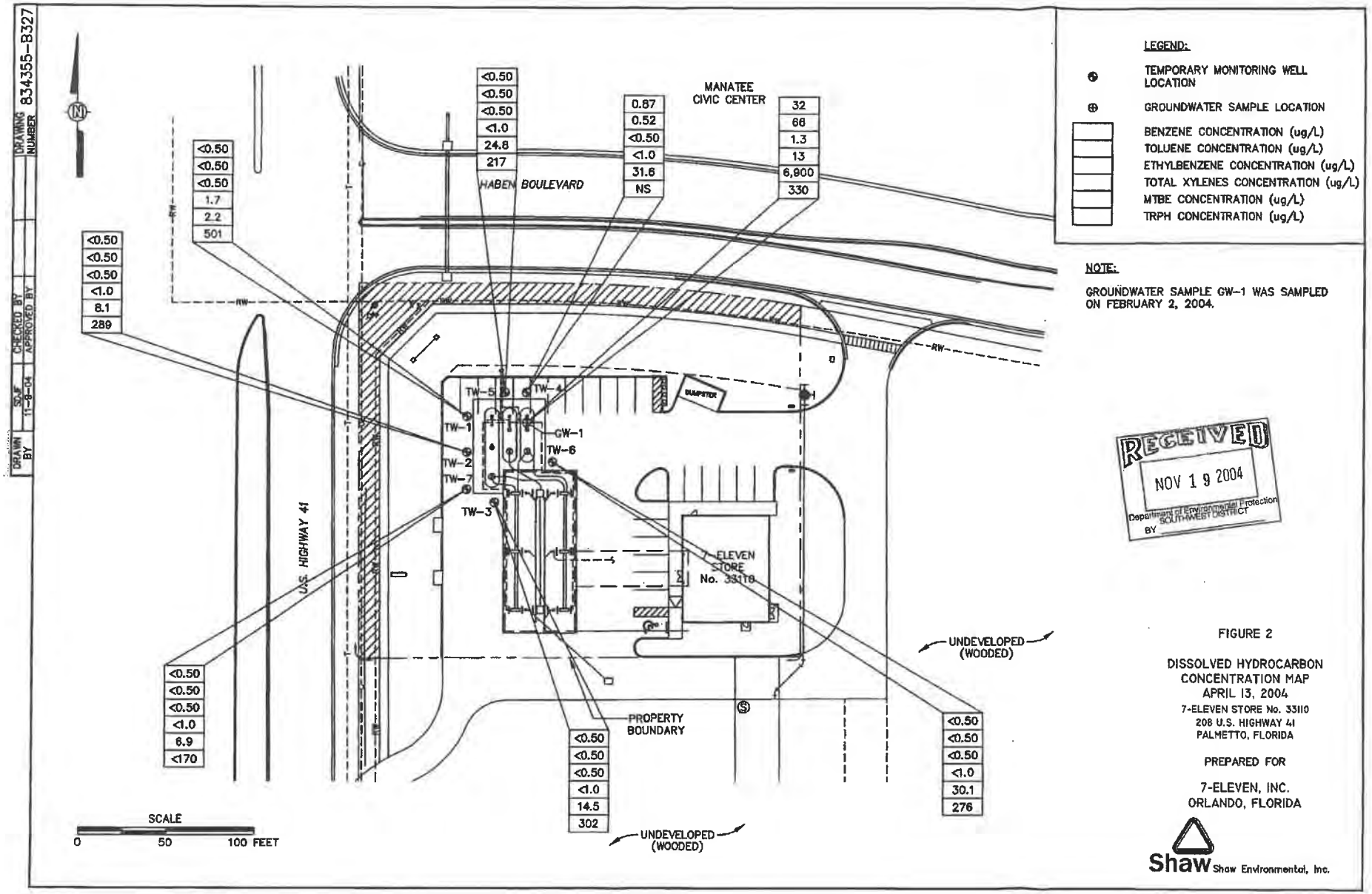


FIGURE 2

DISSOLVED HYDROCARBON CONCENTRATION MAP
APRIL 13, 2004
7-ELEVEN STORE No. 33110
208 U.S. HIGHWAY 41
PALMETTO, FLORIDA

PREPARED FOR

7-ELEVEN, INC.
ORLANDO, FLORIDA

Shaw Shaw Environmental, Inc.

Shaw Environmental, Inc.

725 U.S. Highway 301 South
Tampa, FL 33619-4349
813.626.2336
Fax: 813.626.1663

Shaw® Shaw Environmental, Inc.

September 27, 2005



Ms. Lisa Ricci
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

Re: First Semi-Annual Natural Attenuation Monitoring Results
7-Eleven Store No. 33110
208 U.S. Highway 41
Palmetto, Manatee County, Florida
FDEP Facility ID No. 419804045
Project No. 834355-33110000
Non-Program Site

Dear Ms. Ricci:

Shaw Environmental, Inc. (Shaw), on behalf of 7-Eleven, Inc., has completed the first semi-annual natural attenuation monitoring (NAM) for the referenced site in accordance with the Florida Department of Environmental Protection's (FDEP) NAM Plan Approval Order dated August 12, 2005. A copy of the NAM Plan Approval Order is in **Attachment A**. On September 12, 2005, groundwater samples were collected from MW-1, MW-2, MW-3, and MW-4, and sent to Accutest Laboratories in Orlando, Florida, to be analyzed for benzene, toluene, ethyl benzene (BTEX) and methyl tertiary butyl ether (MTBE) by US Environmental Protection Agency (EPA) Method 8021, for polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8310, and for total recoverable petroleum hydrocarbons (TRPH) by FDEP Method FL-PRO. Groundwater analytical results indicated that Groundwater Cleanup Target Levels (GCTLs) were slightly exceeded for MTBE in MW-1. Because analytical results indicated that all PAH and TRPH concentrations were below the method detection limit in all wells, Shaw recommends that PAHs and TRPH be dropped from the sampling requirements. Groundwater analytical results are summarized in **Table 1** and on **Figure 1**. Copies of the laboratory analytical report, chain-of-custody record, FDEP groundwater sampling logs, and calibration sheet are in **Attachment B**.

Prior to groundwater sampling on September 12, 2005, depth-to-water from top-of-casing measurements were collected. A depth to water and water table elevation summary is in **Table 2** and a groundwater elevation contour map is presented as **Figure 1**.

The second semi-annual NAM sampling is tentatively scheduled for February 2006.

The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, nor the use of segregated portions of this report.

Please contact me at (813) 612-3603 or David Petersen at (813) 612-3683 with any questions or comments.

Sincerely,
Shaw Environmental, Inc.

Meagen Gonzalez
Project Geologist

David Petersen, P.G.
State of Florida License No. 2019
Date: 9/27/05

Attachment: Tables
Figure
Attachment A—NAM Plan Approval Order
Attachment B—Laboratory Analytical Report, Chain-of-Custody Record, FDEP Groundwater Sampling Logs, and Calibration Sheet

cc: Ken Hilliard, 7-Eleven, Inc.
Shaw/7-Eleven Portal
Tampa Project File

TABLES

TABLE 1: GROUNDWATER DATA SUMMARY

Facility Name: 7-Eleven Store No. 33110 Facility ID No.: 419804045

Sample		Laboratory Analysis (µg/L)													
ID Number	Date	Benzene	Toluene	Ethyl-benzene	Total Xylenes	MTBE	TRPH	Acenaph-thylene	Benzo(a) anthracene	Benzo(k) fluoranthene	Pyrene	Lead	Naphthalene	1- Methyl-naphthalene	2- Methyl-naphthalene
GCTLs		1	40	30	20	20	5,000	210	0.2	0.2	210	15	14	28	28
NADCs		100	400	300	200	200	50,000	2,100	20	20	2,100	400	140	280	280
GW-1	02/02/04	32	66	1.3	13	6,900	330	2.0	0.99P	0.29P	2.0		2.2		
TW-1	04/13/04	<0.50	<0.50	<0.50	1.7 (I)	2.2	501	<1.0	<0.10	<0.10	<0.50		<0.50		
TW-2	04/13/04	<0.50	<0.50	<0.50	<1.0	8.1	289	<1.0	<0.10	<0.10	<0.50		<0.50		
TW-3	04/13/04	<0.50	<0.50	<0.50	<1.0	14.5	302	<1.0	<0.10	<0.10	<0.50		<0.50		
TW-4	04/13/04	0.87 (I)	0.52 (I)	<0.50	<1.0	31.6	NS	NS	NS	NS	NS				
TW-5	04/13/04	<0.50	<0.50	<0.50	<1.0	24.8	217 (I)	<1.0	<0.10	<0.10	<0.50		<0.50		
TW-6	04/13/04	<0.50	<0.50	<0.50	<1.0	30.1	276	<1.0	<1.0	<0.10	<0.50		<0.50		
TW-7	08/06/04	<0.50	<0.50	<0.50	<1.0	6.9	<170	<1.0	<0.10	<0.10	<0.51		<1.0		
MW-1	05/04/05	<0.50	<0.50	<0.50	<1.0	19.0	434	<0.95	<0.048	<0.095	<0.48		<0.95	<0.48	<0.48
	09/12/05	<0.50	<0.50	<0.50	<1.0	24.0	194	<1.0	<0.052	<0.10	<0.52		<1.0	<0.52	<0.52
MW-2	05/04/05	<0.50	<0.50	<0.50	<1.0	5.4	332	<0.95	<0.048	<0.095	<0.48		<0.95	<0.48	<0.48
	09/12/05	<0.50	<0.50	<0.50	<1.0	9.1	463	<1.0	<0.051	<0.10	<0.51		<1.0	<0.51	<0.51
MW-3	05/04/05	<0.50	<0.50	<0.50	<1.0	14.6	267	<0.96	<0.048	<0.096	<0.48		<0.96	<0.48	<0.48
	09/12/05	<0.50	0.81	<0.50	1.1	15.8	1,590	<1.0	<0.052	<0.10	<0.52		<1.0	<0.52	<0.52
MW-4	05/04/05	<0.50	<0.50	<0.50	<1.0	3.0	354	<0.95	<0.048	<0.095	<0.48	6.5	<0.95	<0.48	<0.48
	09/12/05	<0.50	<0.50	<0.50	<1.0	3.4	526	<0.96	<0.048	<0.096	<0.48		<0.96	<0.48	<0.48

Notes: GCTLs = Groundwater Cleanup Target Levels per Chapter 62-777, Table I, FAC
NADCs = Natural Attenuation Default Concentrations per Chapter 62-777, Table V, FAC
µg/L = micrograms per liter
MTBE = methyl tertiary butyl ether
TRPH = total recoverable petroleum hydrocarbons
(I) = Result > + MDL but < RL
Bold and shading indicate GCTLs and/or NADCs exceeded.

Florida Department of Environmental Protection -- Bureau of Waste Cleanup -- Petroleum Cleanup Section

TABLE 2: GROUNDWATER ELEVATION TABLE

Facility Name: 7-Eleven Store No. 33110 Facility ID No.: 419804045

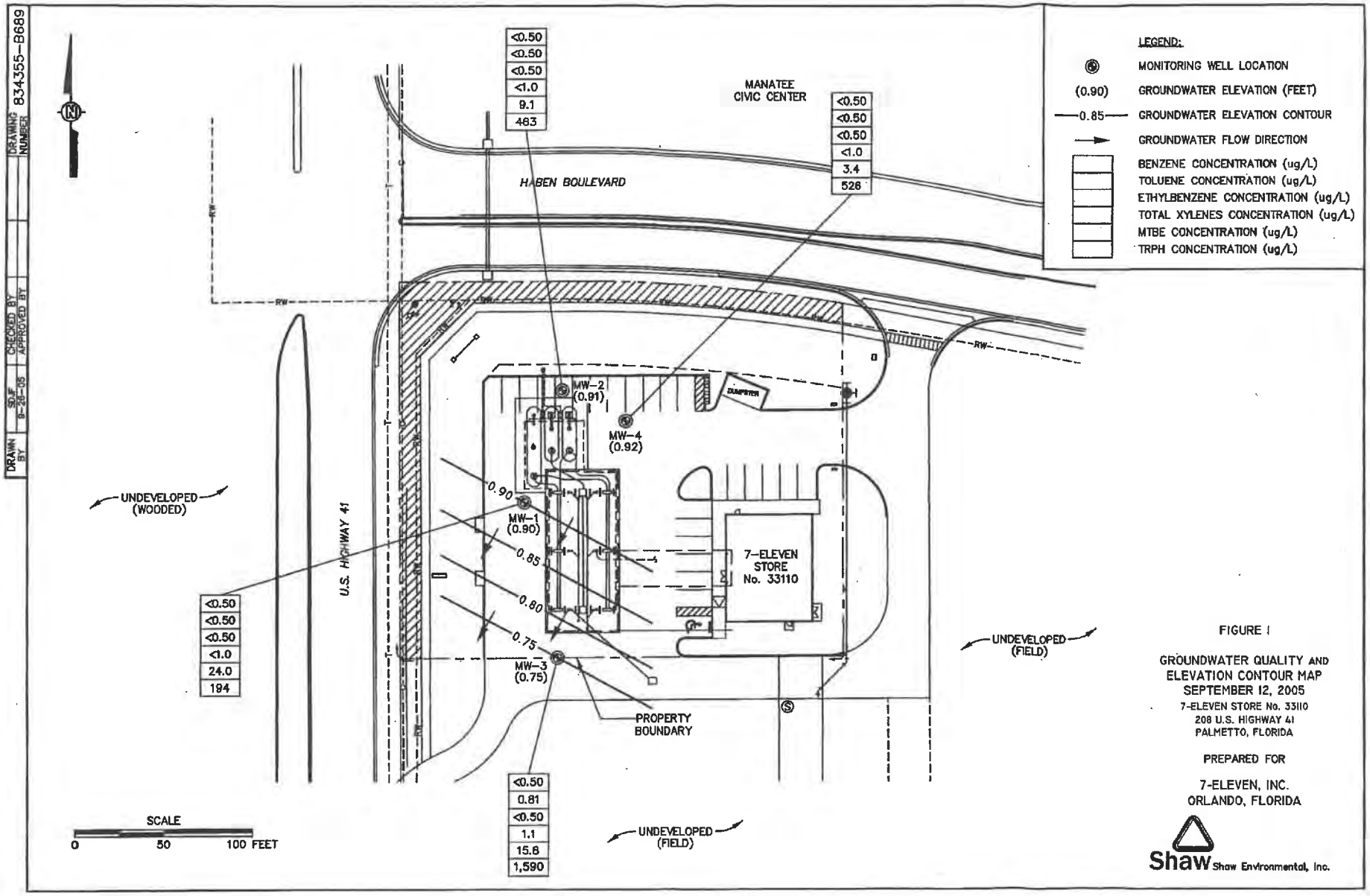
WELL NO.	MW-1			MW-2			MW-3			MW-4								
DIAMETER (Inches)	1			1			1			1								
WELL DEPTH (ft bls)	12			11			11			8								
SCREEN INTERVAL (feet)	2-12			1-11			1-11			1-8								
TOC ELEVATION	5.00			5.37			5.15			4.96								
DATE	DTW	ELE	FP	DTW	ELE	FP	DTW	ELE	FP	DTW	ELE	FP	DTW	ELE	FP	DTW	ELE	FP
05/04/05	3.26	1.74		3.67	1.70		3.60	1.55		3.21	1.75							
05/16/05	3.40	1.60		3.80	1.57		3.85	1.30		3.46	1.50							
09/12/05	4.10	0.90		4.46	0.91		4.40	0.75		4.04	0.92							

Notes:

DTW = depth to water
ELE = elevation
ft bls = feet below land surface
FP = free product
TOC = top of casing
No Data = Blank
TOC elevations calculated using an arbitrary on-site bench mark (5.00 ft amsl)



FIGURE


DRAWING NUMBER 834355-8689
DRAWN BY SDJF 9-26-05
CHECKED BY
APPROVED BY
LEGEND:
MONITORING WELL LOCATION
(0.90) GROUNDWATER ELEVATION (FEET)
0.85 GROUNDWATER ELEVATION CONTOUR
GROUNDWATER FLOW DIRECTION
BENZENE CONCENTRATION (ug/L)
TOLUENE CONCENTRATION (ug/L)
ETHYLBENZENE CONCENTRATION (ug/L)
TOTAL XYLENES CONCENTRATION (ug/L)
MTBE CONCENTRATION (ug/L)
TRPH CONCENTRATION (ug/L)
<0.50
<0.50
<0.50
<1.0
9.1
463
MANATEE CIVIC CENTER
<0.50
<0.50
<0.50
<1.0
3.4
526
HABEN BOULEVARD
RW
MW-2 (0.91)
MW-4 (0.92)
DUMPSTER
UNDEVELOPED (WOODED)
0.90
MW-1 (0.90)
0.85
0.80
0.75
MW-3 (0.75)
U.S. HIGHWAY 41
7-ELEVEN STORE No. 33110
<0.50
<0.50
<0.50
<1.0
24.0
194
UNDEVELOPED (FIELD)
PROPERTY BOUNDARY
<0.50
0.81
<0.50
1.1
15.8
1,590
UNDEVELOPED (FIELD)
SCALE
0 50 100 FEET
FIGURE 1
GROUNDWATER QUALITY AND ELEVATION CONTOUR MAP
SEPTEMBER 12, 2005
7-ELEVEN STORE No. 33110
208 U.S. HIGHWAY 41
PALMETTO, FLORIDA
PREPARED FOR
7-ELEVEN, INC.
ORLANDO, FLORIDA
Shaw Shaw Environmental, Inc.

Florida Department of
Environmental Protection

Memorandum

TO: Michael Bland
Bureau of Petroleum Storage Systems
Petroleum Cleanup Section 4
Mail Station 4580

FROM: Alison Meetze
Southwest District

DATE: January 31, 2008

SUBJECT: Fifth Semi-Annual Natural Attenuation Monitoring Report Addendum/
No Further Action Request
7-Eleven Store No. 33110
208 U.S. Highway 41
Palmetto, Manatee County, Florida
FDEP ID# 419804045

Enclosed please find the above referenced NAMA/NFA Request for your review and comments. This document has been submitted for scanning into OCULUS.

Thank You.

AMM

Enclosure

Cleanup Target Levels were met for two consecutive groundwater sampling events. Shaw therefore recommends a No Further Action, with or without conditions, be issued for the February 16, 2004 release.

The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client and county, unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, county, FDEP, purposes, locations, timeframes, and project parameters indicated. Shaw is not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. Shaw does not warrant the accuracy of information supplied by others, nor the use of segregated portions of this report.

The data presented herein was either completed by a professional geologist and/or completed by a qualified scientist supervised by a professional geologist, in accordance with Chapters 492, Florida Statutes, and was completed in accordance with all applicable state rules and regulations.

Shaw appreciates the FDEP's assistance with this matter. In the event revisions or clarifications are necessary that can be addressed via e-mail to accelerate and streamline the schedule for this project, please e-mail the undersigned at Lennon.Matthew@shawgrp.com. If you have any questions or require further information, please contact me at (813) 612-3619.

Sincerely,
Shaw Environmental, Inc.

Lennon Matthew
Project Geologist

James T. Cheze
Professional Geologist
Florida License No.: PG-0002187
Date: 1-29-08

Attachment: Table
Figure
Attachment A—FDEP's Fifth Semi-Annual NAM Report, and No Further Action Request Review Letter
Attachment B—Laboratory Analytical Reports, Chain-of-Custody Records, Boring Logs, and OVA Calibration Sheets

cc: Ken Hilliard, 7-Eleven, Inc.
Jack Reynolds, Shaw, Irving, Texas
Shaw/7-Eleven Portal
Tampa Project File

Florida Department of Environmental Protection – Bureau of Waste Cleanup – Petroleum Cleanup Section

TABLE 1: SOIL DATA SUMMARY

Facility Name: 7-Eleven Store No. 33110 **Facility ID No.: 419804045**

Sample				OVA Screening Results			Laboratory Analysis (mg/kg)																						
ID Number	Date	Approx. Depth to Water (feet)	Sample Interval (ft bls)	Total Reading (ppm)	Carbon Filtered (ppm)	Net Reading (ppm)	Benzene	Toluene	Ethylbenzene	Total Xylenes	MTBE	TRPH	Acenaphthene	Acenapthylene	Anthracene	Benzo(g,h,i) perylene	Fluoranthene	Fluorene	Naphthalene	1-Methyl-naphthalene	2-Methyl-naphthalene	Phenanthrene	Pyrene	Benzo(a)pyrene Equivalent*	Benzo(a) pyrene	Benzo(a) anthracene	Benzo(b) fluoranthene	Benzo(k) fluoranthene	Chrysene	Dibenzo(a,h) anthracene	
Toxic Equivalency Factor							**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**1**	**0.1**	**0.1**	**0.01**	**0.001**	**1**	
SCTLs - Direct Exposure Residential							**1.2**	**7,500**	**1,500**	**130**	**4,400**	**460**	**2,400**	**1,800**	**21,000**	**2,500**	**3,200**	**2,600**	**55**	**200**	**210**	**2,200**	**2,400**	**0.1**	**0.1***	*	*	*	*	*	
SCTLs - Leachability Based on Groundwater Criteria							**0.007**	**0.5**	**0.6**	**0.2**	**0.09**	**340**	**2.1**	**27.0**	**2,500**	**32,000**	**1,200**	**160**	**1.2**	**3.1**	**8.5**	**250**	**880**	**8**	**8**	**0.8**	**2.4**	**24**	**77**	**0.7**	
SB-1	11/07/07	3.5	1	0		0																									
			2	0		0	0.0019 U	0.0019 U	0.0019 U	0.0040 U	0.0019 U		0.18 U	0.18 U	0.18 U	0.018 U	0.088 U	0.18 U	0.088 U	0.088 U	0.088 U	0.18 U	0.088 U		0.018 U	0.088 U	0.018 U	0.018 U	0.088 U	0.018 U	0
			3	0		0																									
SB-2	11/07/07	3.5	1	0		0																									
			2	0		0																									
			3	0		0	0.0015 U	0.0015 U	0.0015 U	0.0032 U	0.0015 U		0.18 U	0.18 U	0.18 U	0.018 U	0.089 U	0.18 U	0.089 U	0.089 U	0.089 U	0.18 U	0.089 U		0.018 U	0.089 U	0.018 U	0.018 U	0.089 U	0.018 U	0
SB-3	01/14/08	3.5	1	0		0																									
			2	0		0																									
			3	0		0						5.6 U																			

Notes: SCTLs = Soil Cleanup Target Levels per Chapter 62-777, Table II, Florida Administrative Code
ft bls = feet below land surface
mg/kg = milligrams per kilogram
MTBE = methyl tertiary butyl ether
OVA = organic vapor analyzer
ppm = parts per million
TRPH = total recoverable petroleum hydrocarbons
Blank = No data or not analyzed for that specific parameter.
Bold and shaded values indicate SCTLs exceeded
Flagged constituent data qualifers can be reviewed with attached laboratory final report.
U = Not detected

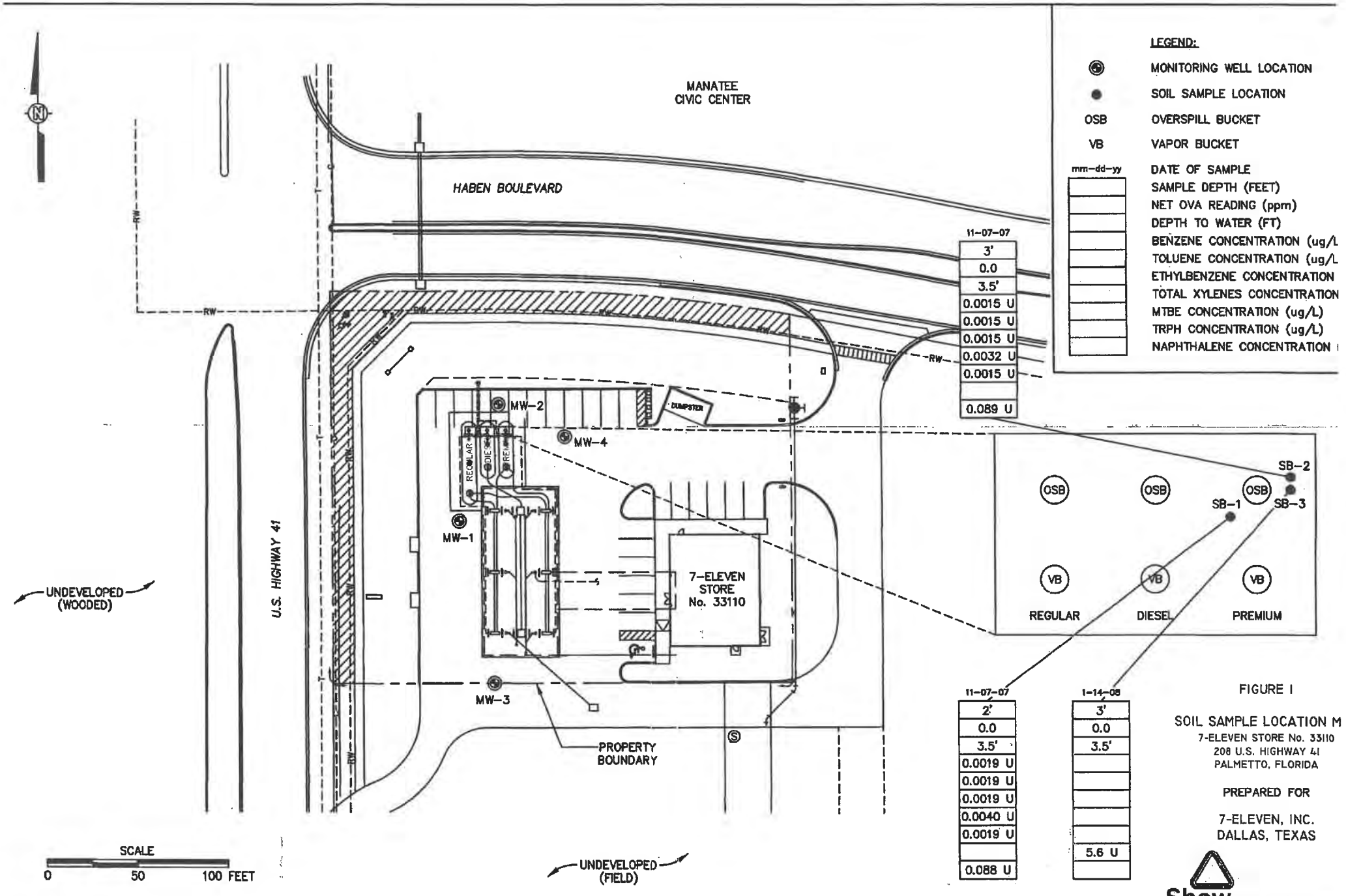


FIGURE 1

SOIL SAMPLE LOCATION M

7-ELEVEN STORE No. 33110
208 U.S. HIGHWAY 41
PALMETTO, FLORIDA

PREPARED FOR

7-ELEVEN, INC.
DALLAS, TEXAS

Shaw Shaw Environmental, I

Florida Department of
Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 22, 2008

CERTIFIED MAIL # 7007 2680 0000 5032 9690
RETURN RECEIPT REQUESTED

Mr. Ken Hilliard
Manager of Environmental Services
7-Eleven, Inc. (Loc. 0150)
P.O. Box 711
Dallas, TX 75221-0711

Subject: Site Rehabilitation Completion Order
7-Eleven Store # 33110
208 US Highway 41
Palmetto, Manatee County, Florida
FDEP ID# 419804045
Discharge Date: 2/16/2004

Dear Mr. Hilliard:

John Vargo at the Bureau of Petroleum Storage Systems, Petroleum Cleanup Section 5, has reviewed the Site Rehabilitation Completion Report (SRCR) and No Further Action Proposal (NFAP), dated January 29, 2008 (received January 30, 2008), prepared and submitted by Shaw Environmental, Inc. for the petroleum product discharge referenced above. Documentation submitted with the SRCR/NFAP confirms that criteria set forth in Subsection -770.680(1), Florida Administrative Code (F.A.C.), have been met. Please refer to the attached map of the source property and analytical summary table. The SRCR/NFAP is hereby incorporated by reference in this Site Rehabilitation Completion Order (Order). Therefore, you are released from any further obligation to conduct site rehabilitation at the facility for petroleum product contamination associated with the discharge referenced above, except as set forth below.

1) In the event concentrations of petroleum products' contaminants of concern increase above the levels approved in this Order, or if a subsequent discharge of petroleum or petroleum product occurs at the facility, the Florida Department of Environmental Protection (Department) may require site rehabilitation to reduce concentrations of petroleum products' contaminants of concern to the levels approved in the SRCR/NFAP or otherwise allowed by Chapter 62-770, F.A.C.

2) Additionally, you are required to properly abandon all monitoring wells, except compliance wells utilized to meet the release detection requirements of Chapter

How to File a Petition for an Administrative Hearing

A person whose substantial interests are affected by this Order may petition for an administrative hearing under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Department's Agency Clerk in the Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from 7-Eleven, Inc., shall mail a copy of the petition to 7-Eleven, Inc. at the time of filing. Failure to file a petition within this time period shall waive the right of anyone who may request an administrative hearing under Sections 120.569 and 120.57, F.S.

Pursuant to Subsection 120.569(2), F.S. and Rule 28-106.201, F.A.C., a petition for an administrative hearing shall contain the following information:

1) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any; the facility owner's name and address, if different from the petitioner; the FDEP facility number, and the name and address of the facility;
2) A statement of when and how each petitioner received notice of the Department's action or proposed action;
3) An explanation of how each petitioner's substantial interests are or will be affected by the Department's action or proposed action;
4) A statement of the disputed issues of material fact, or a statement that there are no disputed facts;
5) A statement of the ultimate facts alleged, including a statement of the specific facts the petitioner contends warrant reversal or modification of the Department's action or proposed action;
6) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action; and
7) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Department's action or proposed action.

This Order is final and effective as of the date on the top of the first page of this Order. Timely filing a petition for an administrative hearing postpones the date this Order takes effect until the Department issues either a final order pursuant to an administrative hearing or an Order Responding to Supplemental Information provided to the Department pursuant to meetings with the Department.

Judicial Review

Any party to this Order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the Department's Agency Clerk in the Office of General Counsel at 3900 Commonwealth

Memorandum

Florida Department of Environmental Protection

To: Alison Meetze
Florida Department of Environmental Protection – Southwest District
13051 N. Telecom Parkway, Temple Terrace, Florida 33637

Through: Michael Bland, P.G.
Bureau of Petroleum Storage Systems
Petroleum Cleanup Section 4
Mail Station 4580

From: John S. Vargo, C.P.G., P.G.
Bureau of Petroleum Storage Systems
WRS Petroleum Cleanup Section 5
Mail Station 4585

Date: February 11, 2008

Subject: Request for No Further Action Determination
Preliminary Review Comments #7
Fifth Semi-Annual Natural Attenuation Monitoring Report Addendum
7-Eleven #33110 (DRF#1: 02/16/2004)
208 US Hwy 41
Palmetto, Manatee County, Florida
DEP Facility ID #41-9804045

I have reviewed the Request for No Further Action (NFA) Determination dated January 29, 2008, (received by the Southwest District in Tampa on January 30, 2008, and by the Bureau of Petroleum Storage Systems in Tallahassee on February 4, 2008). Shaw Environmental, Inc. (SHAW) prepared the Fifth Semi-Annual Natural Attenuation Monitoring (NAM) Report Addendum as authorized by Mr. Ken Hilliard of 7-Eleven, Inc.

The referenced documents correspond to: (1) Limited Closure Summary Report dated March 4, 2004; (2) Site Assessment Report (SAR) dated August 12, 2004; (3) SAR Response to Comments dated November 18, 2004; (4) SARA Response to Comments dated May 26, 2005; (5) Department's NAMP Approval Order dated August 12, 2005; (6) First Semi-Annual NAM Results report dated September 27, 2005; (7) Third Semi-Annual NAM Results report dated September 22, 2006; (8) Fifth Semi-Annual NAM Report dated September 5, 2007; and, (9) Fifth Semi-Annual NAM Report Addendum dated January 29, 2008.

Dept. Of Environmental Protection

FEB 19 2008

Southwest District

Florida Department of
Environmental Protection

Memorandum

TO: Michael Bland
Bureau of Petroleum Storage Systems
Petroleum Cleanup Section 4
Mail Station 4580

FROM: Alison Meetze
Southwest District

DATE: January 31, 2008

SUBJECT: Fifth Semi-Annual Natural Attenuation Monitoring Report Addendum/
No Further Action Request
7-Eleven Store No. 33110
208 U.S. Highway 41
Palmetto, Manatee County, Florida
FDEP ID# 419804045

Enclosed please find the above referenced NAMA/NFA Request for your review and comments. This document has been submitted for scanning into OCULUS.

Thank You.

AMM

Enclosure

Shaw® Shaw Environmental, Inc.

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January 29, 2008

Ms. Alison Meetze
Florida Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Re: Fifth Semi-Annual Natural Attenuation Monitoring Report Addendum
7-Eleven Store No. 33110
208 U.S. Highway 41
Palmetto, Manatee County, Florida
FDEP Facility ID No. 419804045
Project No. 126444-33110000
Non-Program Site

Dept. Of Environmental Protection
JAN 30 2008
Southwest District

Dear Ms. Meetze:

Shaw Environmental, Inc. (Shaw), on behalf of 7-Eleven, Inc., is in receipt of the Florida Department of Environmental Protection's (FDEP) Fifth Semi-Annual Natural Attenuation Monitoring (NAM) Report, and No Further Action Request review letter, dated October 2, 2007. Based upon the FDEP's comments in this letter, Shaw completed additional soil assessment near the premium unleaded overspill bucket (OSB) to evaluate whether the previously identified soil contamination related to the February 16, 2004, discharge has been remediated through natural attenuation. A copy of the FDEP's review letter is in **Attachment A**.

On November 7, 2007, and on January 14, 2008, Shaw installed soil borings SB-1 through SB-3 near the premium unleaded OSBs to assess hydrocarbon impacts in the soil. The concrete above the OSBs was cut with a 4-inch core drill and the borings were advanced to between approximately 3 to 3.5 feet below land surface (ft bls) using a stainless steel hand auger. Soil samples were collected to approximately 3 ft bls. The water table was encountered at 3.5 ft bls. The soil sample locations are depicted on **Figure 1**. All soil samples were screened onsite using a field calibrated organic vapor analyzer (OVA). OVA readings were 0 parts per million on all samples collected. To confirm the OVA results two samples, SB-1 at 2 ft bls and SB-2 at 3 ft bls, were collected on November 7, 2007, and sent to Accutest Laboratories Southeast Inc. (Accutest) in Orlando, Florida, to be analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX) and methyl tertiary butyl ether (MTBE) by US Environmental Protection Agency (EPA) Method 8260B and for polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8310. An additional confirmatory sample, SB-3 at 3 ft bls, was collected on January 14, 2008, and sent to Accutest and analyzed for total recoverable petroleum hydrocarbon (TRPH) by FDEP Method FL-PRO. The soil analytical results indicated that Chapter 62-777, Florida Administrative Code (FAC), Soil Cleanup Target Levels (SCTLs) were not exceeded in the samples collected. Soil analytical results are summarized in **Table 1** and on **Figure 1**. Copies of the laboratory analytical reports, chain-of-custody records, boring logs, and OVA calibration sheets are in **Attachment B**.

Based on the confirmatory soil laboratory analytical results, impacted soil is no longer present in the area of the premium unleaded OSB. The fifth quarter NAM report documented that Chapter 62-777, FAC, Groundwater

Cleanup Target Levels were met for two consecutive groundwater sampling events. Shaw therefore recommends a No Further Action, with or without conditions, be issued for the February 16, 2004 release.

The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client and county, unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, county, FDEP, purposes, locations, timeframes, and project parameters indicated. Shaw is not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. Shaw does not warrant the accuracy of information supplied by others, nor the use of segregated portions of this report.

The data presented herein was either completed by a professional geologist and/or completed by a qualified scientist supervised by a professional geologist, in accordance with Chapters 492, Florida Statutes, and was completed in accordance with all applicable state rules and regulations.

Shaw appreciates the FDEP's assistance with this matter. In the event revisions or clarifications are necessary that can be addressed via e-mail to accelerate and streamline the schedule for this project, please e-mail the undersigned at Lennon.Matthew@shawgrp.com. If you have any questions or require further information, please contact me at (813) 612-3619.

Sincerely,
Shaw Environmental, Inc.

Lennon Matthew
Project Geologist

James T. Cheze
Professional Geologist
Florida License No.: PG-0002187
Date: 1-29-08

Attachment: Table
Figure
Attachment A—FDEP's Fifth Semi-Annual NAM Report, and No Further Action Request Review Letter
Attachment B—Laboratory Analytical Reports, Chain-of-Custody Records, Boring Logs, and OVA Calibration Sheets

cc: Ken Hilliard, 7-Eleven, Inc.
Jack Reynolds, Shaw, Irving, Texas
Shaw/7-Eleven Portal
Tampa Project File

TABLE

Florida Department of
Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 22, 2008

CERTIFIED MAIL # 7007 2680 0000 5032 9690
RETURN RECEIPT REQUESTED

Mr. Ken Hilliard
Manager of Environmental Services
7-Eleven, Inc. (Loc. 0150)
P.O. Box 711
Dallas, TX 75221-0711

Subject: Site Rehabilitation Completion Order
7-Eleven Store # 33110
208 US Highway 41
Palmetto, Manatee County, Florida
FDEP ID# 419804045
Discharge Date: 2/16/2004

Dear Mr. Hilliard:

John Vargo at the Bureau of Petroleum Storage Systems, Petroleum Cleanup Section 5, has reviewed the Site Rehabilitation Completion Report (SRCR) and No Further Action Proposal (NFAP), dated January 29, 2008 (received January 30, 2008), prepared and submitted by Shaw Environmental, Inc. for the petroleum product discharge referenced above. Documentation submitted with the SRCR/NFAP confirms that criteria set forth in Subsection -770.680(1), Florida Administrative Code (F.A.C.), have been met. Please refer to the attached map of the source property and analytical summary table. The SRCR/NFAP is hereby incorporated by reference in this Site Rehabilitation Completion Order (Order). Therefore, you are released from any further obligation to conduct site rehabilitation at the facility for petroleum product contamination associated with the discharge referenced above, except as set forth below.

1) In the event concentrations of petroleum products' contaminants of concern increase above the levels approved in this Order, or if a subsequent discharge of petroleum or petroleum product occurs at the facility, the Florida Department of Environmental Protection (Department) may require site rehabilitation to reduce concentrations of petroleum products' contaminants of concern to the levels approved in the SRCR/NFAP or otherwise allowed by Chapter 62-770, F.A.C.

2) Additionally, you are required to properly abandon all monitoring wells, except compliance wells utilized to meet the release detection requirements of Chapter

62-761 or 62-762, F.A.C., within 60 days of receipt of this Order. The monitoring wells must be plugged and abandoned in accordance with the requirements of Subsection 62-532.500(4), F.A.C.

Legal Issues

The Department's Order shall become final unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, Florida Statutes (F.S.), within 21 days of receipt of this Order. The procedures for petitioning for an administrative hearing are set forth below.

Persons affected by this Order have the following options:

1) If you choose to accept the Department's decision regarding the SRCR/NFAP you do not have to do anything. This Order is final and effective as of the date on the top of the first page of this Order.

2) If you choose to challenge the decision, you may do the following:

   a) File a request for an extension of time to file a petition for an administrative hearing with the Department's Agency Clerk in the Office of General Counsel within 21 days of receipt of this Order; such a request should be made if you wish to meet with the Department in an attempt to informally resolve any disputes without first filing a petition for an administrative hearing; or

   b) File a petition for an administrative hearing with the Department's Agency Clerk in the Office of General Counsel within 21 days of receipt of this Order.

Please be advised that mediation of this decision pursuant to Section 120.573, F.S., is not available.

How to Request an Extension of Time to File a Petition for an Administrative Hearing

For good cause shown, pursuant to Subsection 62-110.106(4), F.A.C., the Department may grant a request for an extension of time to file a petition for an administrative hearing. Such a request must be filed (received) by the Department's Agency Clerk in the Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from 7-Eleven, Inc., shall mail a copy of the request to 7-Eleven, Inc. at the time of filing. Timely filing a request for an extension of time tolls the time period within which a petition for an administrative hearing must be made.

How to File a Petition for an Administrative Hearing

A person whose substantial interests are affected by this Order may petition for an administrative hearing under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Department's Agency Clerk in the Office of General Counsel at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000, within 21 days of receipt of this Order. Petitioner, if different from 7-Eleven, Inc., shall mail a copy of the petition to 7-Eleven, Inc. at the time of filing. Failure to file a petition within this time period shall waive the right of anyone who may request an administrative hearing under Sections 120.569 and 120.57, F.S.

Pursuant to Subsection 120.569(2), F.S. and Rule 28-106.201, F.A.C., a petition for an administrative hearing shall contain the following information:

1) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any; the facility owner's name and address, if different from the petitioner; the FDEP facility number, and the name and address of the facility;
2) A statement of when and how each petitioner received notice of the Department's action or proposed action;
3) An explanation of how each petitioner's substantial interests are or will be affected by the Department's action or proposed action;
4) A statement of the disputed issues of material fact, or a statement that there are no disputed facts;
5) A statement of the ultimate facts alleged, including a statement of the specific facts the petitioner contends warrant reversal or modification of the Department's action or proposed action;
6) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action; and
7) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Department's action or proposed action.

This Order is final and effective as of the date on the top of the first page of this Order. Timely filing a petition for an administrative hearing postpones the date this Order takes effect until the Department issues either a final order pursuant to an administrative hearing or an Order Responding to Supplemental Information provided to the Department pursuant to meetings with the Department.

Judicial Review

Any party to this Order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the Department's Agency Clerk in the Office of General Counsel at 3900 Commonwealth

Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within 30 days after this Order is filed with the Department's clerk (see below).

Questions

Any questions regarding the Department's review of your SRCR/NFAP should be directed to Alison Meetze at (813) 632-7600, ext. 493 or John Vargo at (850) 222-6446, ext. 248. Questions regarding legal issues should be referred to the Department's Office of General Counsel at (850) 245-2242. Contact with any of the above does not constitute a petition for an administrative hearing or a request for an extension of time to file a petition for an administrative hearing.

The FDEP Facility Number for this facility is 419804045. Please use this identification on all future correspondence with the Department.

Sincerely,

Deborah A. Getzoff
District Director
Southwest District

DAG/amm

Attachments

cc: Lennon Matthew, Shaw Environmental, Inc.
Paul Panik, Manatee County Environmental Management Department
John Vargo, P.G., FDEP-BPSS Cleanup Section 5
Ken Weber, Southwest Florida Water Management District

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to
§120.52 Florida Statutes, with the
designated Department Clerk, receipt
of which is hereby acknowledged.

Clerk

02/22/08
Date

Memorandum

Florida Department of Environmental Protection

To: Alison Meetze
Florida Department of Environmental Protection – Southwest District
13051 N. Telecom Parkway, Temple Terrace, Florida 33637

Through: Michael Bland, P.G.
Bureau of Petroleum Storage Systems
Petroleum Cleanup Section 4
Mail Station 4580

From: John S. Vargo, C.P.G., P.G.
Bureau of Petroleum Storage Systems
WRS Petroleum Cleanup Section 5
Mail Station 4585

Date: February 11, 2008

Subject: Request for No Further Action Determination
Preliminary Review Comments #7
Fifth Semi-Annual Natural Attenuation Monitoring Report Addendum
7-Eleven #33110 (DRF#1: 02/16/2004)
208 US Hwy 41
Palmetto, Manatee County, Florida
DEP Facility ID #41-9804045

I have reviewed the Request for No Further Action (NFA) Determination dated January 29, 2008, (received by the Southwest District in Tampa on January 30, 2008, and by the Bureau of Petroleum Storage Systems in Tallahassee on February 4, 2008). Shaw Environmental, Inc. (SHAW) prepared the Fifth Semi-Annual Natural Attenuation Monitoring (NAM) Report Addendum as authorized by Mr. Ken Hilliard of 7-Eleven, Inc.

The referenced documents correspond to: (1) Limited Closure Summary Report dated March 4, 2004; (2) Site Assessment Report (SAR) dated August 12, 2004; (3) SAR Response to Comments dated November 18, 2004; (4) SARA Response to Comments dated May 26, 2005; (5) Department's NAMP Approval Order dated August 12, 2005; (6) First Semi-Annual NAM Results report dated September 27, 2005; (7) Third Semi-Annual NAM Results report dated September 22, 2006; (8) Fifth Semi-Annual NAM Report dated September 5, 2007; and, (9) Fifth Semi-Annual NAM Report Addendum dated January 29, 2008.

Dept. Of Environmental Protection

FEB 19 2008

Southwest District

Summary of Findings

1) Summary of Soil Conditions (Spill Buckets)
   a) Analysis of soil samples collected from the overfill bucket excavations in February 2004 revealed that concentrations of MTBE were detected in sample SS-3 at 3.5 feet depth at levels exceeding soil cleanup target levels (SCTLs) for leachability. Soil sample SS-3 was collected from the premium unleaded (PUL) gasoline overfill bucket excavation.
   b) In order to achieve closure, sites need to either achieve the SCTLs or implement institutional controls. There are no special accommodations in the rule for exceptions due to practicality considerations. Hence, consideration for institutional controls is necessary if SCTLs cannot be achieved by active remediation or natural attenuation.
   c) As previously stated, issues pertaining to a NFA with Conditions, due to soil conditions at PUL gasoline spill bucket location, may not be resolvable until the tanks are upgraded in the future.
2) Based on review of the Fifth Semi-Annual NAM Report Addendum dated January 29, 2008, the following was noted:
   a) As previously stated, analysis of groundwater samples MW-1 to MW-4 collected on July 16, 2007, revealed that no contaminants of concern were detected at levels exceeding groundwater cleanup target levels (GCTLs) for the second consecutive semi-annual monitoring event.
   b) On November 7, 2007, verification spill bucket soil borings SB-1 and SB-2 were performed down to 3.5 feet depth for collection of verification spill bucket soil samples for analysis. Field screening soil samples with an OVA revealed readings of zero parts per million (ppm). Verification spill bucket soil samples SB-1 (2') and SB-2 (2') were collected for analysis of BTEX/MTBE and PAHs.
      i) Analysis of verification spill bucket soil samples SB-1 (2') and SB-2 (3') revealed that no contaminants of concern were detected at levels exceeding SCTLs for BTEX/MTBE and/or PAHs.
   c) On January 14, 2008, verification spill bucket soil boring SB-3 was performed near soil boring SB-2 down to 3.5 feet depth for collection of verification spill bucket soil samples for analysis. Field screening soil samples with an OVA revealed readings of zero ppm. Verification spill bucket soil sample SB-3 (3') was collected for analysis by FL-PRO.
      i) Analysis of verification spill bucket soil sample SB-3 (3') revealed that no contaminants of concern were detected at levels exceeding SCTLs for TRPH.

Based on my review of the referenced documents, a recommendation for NFA without conditions is appropriate for this area of the subject site (discharge #1 at spill buckets dated February 16, 2004) and that a Site Rehabilitation Completion Order (SRCO) should be issued by the Department, as this report has met the SAR requirements for assessment of soil and groundwater conditions per Chapter 62-770.600, F.A.C. and the NFA without conditions requirements of Chapter 62-770.680, F.A.C.

If you have any questions, please contact me by telephone at (850) 222-6446, ext. 248.

Sincerely,

John S. Vargo, C.P.G., P.G.
Florida Professional Geologist #521
AIPG Certified Professional Geologist #10373
Petroleum Cleanup Section 5
Bureau of Petroleum Storage Systems
Date February 11, 2008

Email: Jvargo@wrscompass.com



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2/22/08

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Mr. Ken Hilliard
Manager of Environmental Services
7-Eleven, Inc. (Loc. 0150)
P.O. Box 711
Dallas, TX 75221-0711

Street, Apt.
or PO Box N

City, State, Z

ER:

ete items 1 and/or 2 for additional services.
ete items 3, 4a, and 4b.
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this form to the front of the mailpiece, or on the back if space does not

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ed.

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Mr. Ken Hilliard
lanager of Environmental Services
7-Eleven, Inc. (Loc. 0150)
P.O. Box 711
Dallas, TX 75221-0711

4a. Article Number
7007 2680 0000 5032 9

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☒ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
03-03-01

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Lidia Avila

ature: *(Addressee or Agent)*
Lidia Avila

8. Addressee's Address *(Only if requested and fee is paid)*

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Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Dept. Of Environmental Protection
MAR 06 2008
Southwest District

Alison Meeks

#41 980 4045

Site No. 54

Former Texaco

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/24/2026 Last Data Refresh: 03/23/2026 Report Generated from DOPPLER

District	Southwest	**Type**	Retail Station
County	Manatee	**Status**	CLOSED
ID	8623833	**Latitude**	27° 31' 4.7281
Name	FORMER TEXACO 711 US HWY 301 PALMETTO, FL 34221-4036	**Longitude**	82° 33' 48.4001
		LL Method	DPHO
Contact	JEROME SMITH	**LL Status**	REVIEWED
Phone	(863) 678-1893	**Status Date**	10/13/2003

Account Owner Information

Name	MACMILLAN OIL 609 N Hepburn Ave Jupiter, FL 33458-5015	**Effective Date**	03/23/2004
Contact	GERLAD DONNINI		
Phone	(561) 768-9327		
Email	COMPLIANCE@SSMINC.COM	**Placard # / Date**	205569 - 03/29/2004

Property Owner Information

Name	SG 711 LLC 1211 N WASHINGTON BLVD SARASOTA, FL 34236	**Effective Date**	03/01/2024
Contact			
Phone			
Email			

Tank	Tank Size	Content	Installed	Placement	Status
1	8000	Unleaded Gas (B)	07/01/1979	UNDERGROUND	Removed from Site (B)

Constructions
(A) Ball check valve
(E) Fiberglass
(M) Spill containment bucket
(N) Flow shut-Off

Pipings
(C) Fiberglass
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(4) Visual inspect dispenser liners
(G) Electronic line leak detector
(L) Automatic tank gauging - USTs

Tank	Tank Size	Content	Installed	Placement	Status
2	8000	Unleaded Gas (B)	07/01/1979	UNDERGROUND	Removed from Site (B)

Constructions
(A) Ball check valve
(E) Fiberglass
(M) Spill containment bucket
(N) Flow shut-Off

Pipings
(C) Fiberglass
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(4) Visual inspect dispenser liners
(G) Electronic line leak detector
(L) Automatic tank gauging - USTs

Tank	Tank Size	Content	Installed	Placement	Status
3	8000	Unleaded Gas (B)	07/01/1979	UNDERGROUND	Removed from Site (B)

Constructions
(A) Ball check valve
(E) Fiberglass
(M) Spill containment bucket
(N) Flow shut-Off

Pipings
(C) Fiberglass
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(4) Visual inspect dispenser liners
(G) Electronic line leak detector
(L) Automatic tank gauging - USTs

Tank	Tank Size	Content	Installed	Placement	Status
4	550	Waste Oil (L)	07/01/1987	UNDERGROUND	Removed from Site (B)

Constructions
(E) Fiberglass
(M) Spill containment bucket
(N) Flow shut-Off

Pipings
(C) Fiberglass

Monitorings
(M) Manual tank gauging - USTs

Insurance Documents

FR Type	Effective Date	Expiration Date	Company Name
INSURANCE	01/01/2004	01/01/2005	ZURICH-AMERICAN

No System Tests Found

Legacy Compliance Activity Information

Activity Code	Date Initiated	Date Completed	Results	Inspector	AST/UST Count	Description
TCR	03/14/2003	03/17/2003	IN-COMPLIANCE	SEGO	0/4	COMPLIANCE ASSURANCE
TCI	12/17/2002	01/08/2003	MINOR OUT-OF-COMPLIANCE	SEGO	0/4	COMPLIANCE ASSURANCE
	Completion Notes ALL SITE TANKS ARE STATUS T, OUR COPY OF REGISTRATION SENT TO TALLAHASSEE					
NCLI	03/21/2001	03/29/2001				COMPLIANCE ASSURANCE
TCI	03/07/2001	03/21/2001	MINOR OUT-OF-COMPLIANCE	FIELD	0/4	COMPLIANCE ASSURANCE

No Compliance Activity Data Found

No Open AOCs Found

No Open Violations Found

Discharge Information

Discharge Date	Clean Up Status	Score	Eligibility Info	Site Manager	Phone
08/22/1987	INACTIVE	10	EARLY DETECTION INCENTIVE-ELIGIBLE		

ST

Appliedscience
AND ENGINEERING LLC
Environmental Science with Integrity

LSSI ASSESSMENT REPORT
FORMER TEXACO
711 US HIGHWAY 301
PALMETTO, MANATEE COUNTY
FACILITY ID # 41/8623833
AS&E PROJECT # 10405

RECEIVED
13 MAR 11 PM 1:42
BUREAU OF PETROLEUM STORAGE SYSTEMS TEAM 5

Prepared For:

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
2600 BLAIR STONE ROAD
TALLAHASSEE, FL.

Prepared By:

Applied Science and Engineering LLC
5680 W Cypress St., Suite H
Tampa, Florida 33607

March 4, 2013

Stacy L. Schaible
Project Manager

Kenneth E. Czoer, P.G.
President

KENNETH E. CZOER * No. 202 * STATE OF FLORIDA * PROFESSIONAL GEOLOGIST

Please refer to the LSSI Report Respons to Comments dated June 10, 2013 (received June 17, 2013) for documents that have been crossed out.

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1.0 INTRODUCTION

Applied Science and Engineering, LLC (AS&E), on behalf of Stephen R Covey, has completed Low Scored Site Initiative (LSSI) assessment activities at 711 US Highway 301 (hereinafter "Site") in Palmetto, Florida. **Figure 1** illustrates the Site location. LSSI assessment was conducted per FDEP Work Order 2013-95-W3471A with a Site Rehabilitation Completion Order (SRCO) as the objective. The Site is currently a retail store that sells trailers and does not have any underground storage tanks (USTs). **Figure 2** illustrates the current layout as well as the approximate locations of the former UST area and former dispenser area.

2.0 SITE HISTORY

The site had one reported discharge on August 22, 1987 that is EDI (Early Detection Incentive) eligible. The current site score is 6. The Site was sold by Motiva Enterprises, an oil company, to the current owner in 2004. Four UST's were registered onsite: three 8,000 gallon UST's containing unleaded gasoline and one 550 gallon UST containing waste oil. No information exists on FDEPs Oculus database as to when the USTs were removed. A discharge was reported on August 22, 1987 based on groundwater Cleanup Target Level (CTL) exceedances in OW-1, which is located in the former gasoline UST area. Little information was available on Oculus regarding the waste oil tank area except that it was located approximately 15 feet south of the northwest corner of the building.

A site assessment was conducted from 1987 to 1988 by Groundwater Technology Inc. Soil contamination was reported in samples collected at wells OW-3 and piezometers 1, 2, and 3 which were located to the southeast of the dispenser area. Benzene concentrations ranged from two to eight ppm. Initial remedial action included a source removal; 35 yds^3 of contaminated soil were removed from the UST and product line areas. Groundwater was reported as impacted in all wells except MW-8, MW-9, and MW-10.

A groundwater remediation system was installed in 1991 consisting of two recovery wells, an air stripping tower, and the discharge of treated water to an infiltration gallery. The most recent report on Oculus was a Remedial Action Report from 1995. Analytical results indicated observation well OW-4 had several analytes above Natural Attenuation Default Concentrations

(NADCs). Concentrations in OW-4 were: benzene – 407 µg/L, toluene 30 µg/L, ethylbenzene – 203 µg/L, total xylenes – 739 µg/L, and MTBE – 36 µg/L.

3.0 SOIL ASSESSMENT

Soil assessment was not conducted during LSSI activities due to the groundwater CTL exceedances encountered during the first field event. **Table 1** summarizes historical soil analytical results.

4.0 GROUNDWATER ASSESSMENT

Groundwater assessment included the collection of groundwater samples from eight existing monitoring wells OW-1, OW-2, OW-3, OW-4, MW-6, MW-8, MW-10, and MW-11. The following wells could not be found: MW-A, MW-B, MW-5, MW-7, MW-9, and RW-1. Groundwater samples were collected from OW-1 and OW-4 on December 12, 2012, while samples for all other wells were collected on December 13, 2012. Groundwater samples were collected using a peristaltic pump and clean polyethylene tubing, except OW-4, which was sampled using a typhoon submersible pump. Groundwater sampling was conducted per Standard Operating Procedures (DEP-SOP-001/01 FS2200 Groundwater Sampling).

The samples were placed on ice, transported to Lakeland Laboratories and analyzed via EPA Method 8260 BTEX/MTBE, EPA Method 8270 PAH, and TRPH using the FL-PRO method. Analytical results for wells OW-1, MW-8, MW-10, and MW-11 indicated all parameters tested were below CTLs as defined in Chapter 62-777, (F.A.C.), Table I. Analytical results for wells OW-3 and OW-4 in the former UST area indicated a benzene concentration above CTLs. The naphthalene concentration in OW-2 was above CTLs. Analytical results for well MW-6 located on the eastern side of the Site indicated a naphthalene concentration above CTLs.

Volatile organic compounds groundwater analytical results are summarized in **Table 2A** and PAHs and TRPHs are summarized in **Table 2B.** Groundwater analytical results are presented on **Figure 3.** Benzene and naphthalene plume maps are included as **Figures 4** and **5** respectively. Groundwater sampling logs and calibration records are included as **Appendix A.** The groundwater analytical report is included as **Appendix B.** Field notes for all current assessment

activities are included in **Appendix C.** The Site Characterization Screening Information Worksheet has been completed and is included in **Appendix D.**

5.0 HYDROGEOLOGY

Water levels were collected on December 13, 2012 and ranged from 0.95 to 3.35 feet. Water table elevations compared to an arbitrary datum ranged from 5.83 feet to 7.68 feet. Based on these data, the groundwater flow direction is to the west/southwest. However, historically groundwater flow direction has been reported to be to the southeast. Groundwater elevation data is summarized in **Table 3.** A current groundwater elevation map is included as **Figure 6.**

6.0 CONCLUSIONS/RECOMMENDATIONS

- Soil impacts were not assessed during this investigation
- Groundwater analytical results for monitoring wells OW-3 and OW-4 located in the former UST area indicate benzene concentrations above CTLs.
- Groundwater analytical results for monitoring wells OW-2 and MW-6 located in the former dispenser area indicate naphthalene concentrations above CTLs.
- Groundwater elevation data indicate a groundwater flow direction to the west.

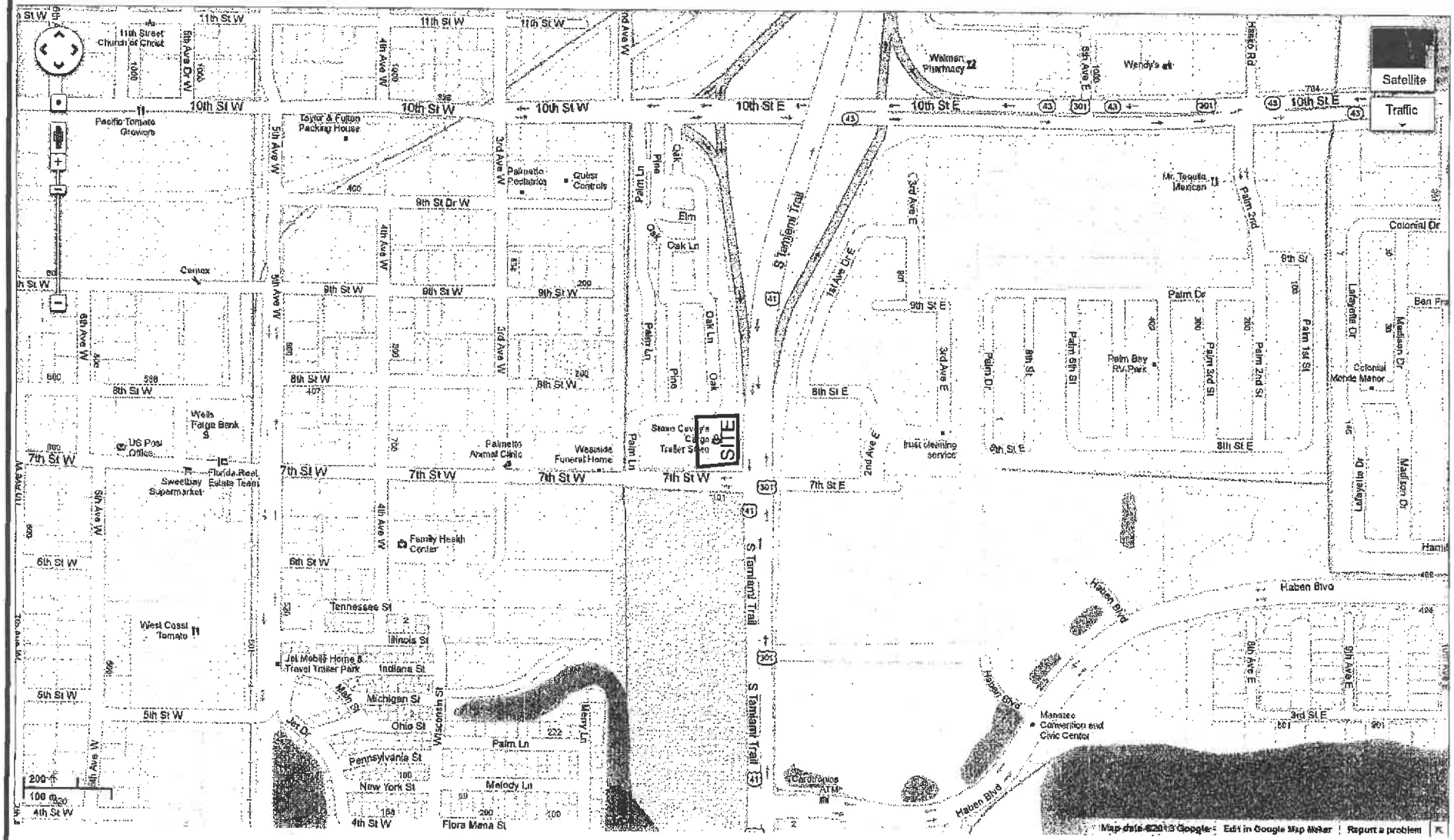
Evidence of petroleum impacts to the groundwater has been detected and the Site does not qualify for a Site Rehabilitation Completion Order. Therefore, AS&E recommends that the Site remain in the EDI program until funding becomes available based on the site priority score.

7.0 LIMITATIONS

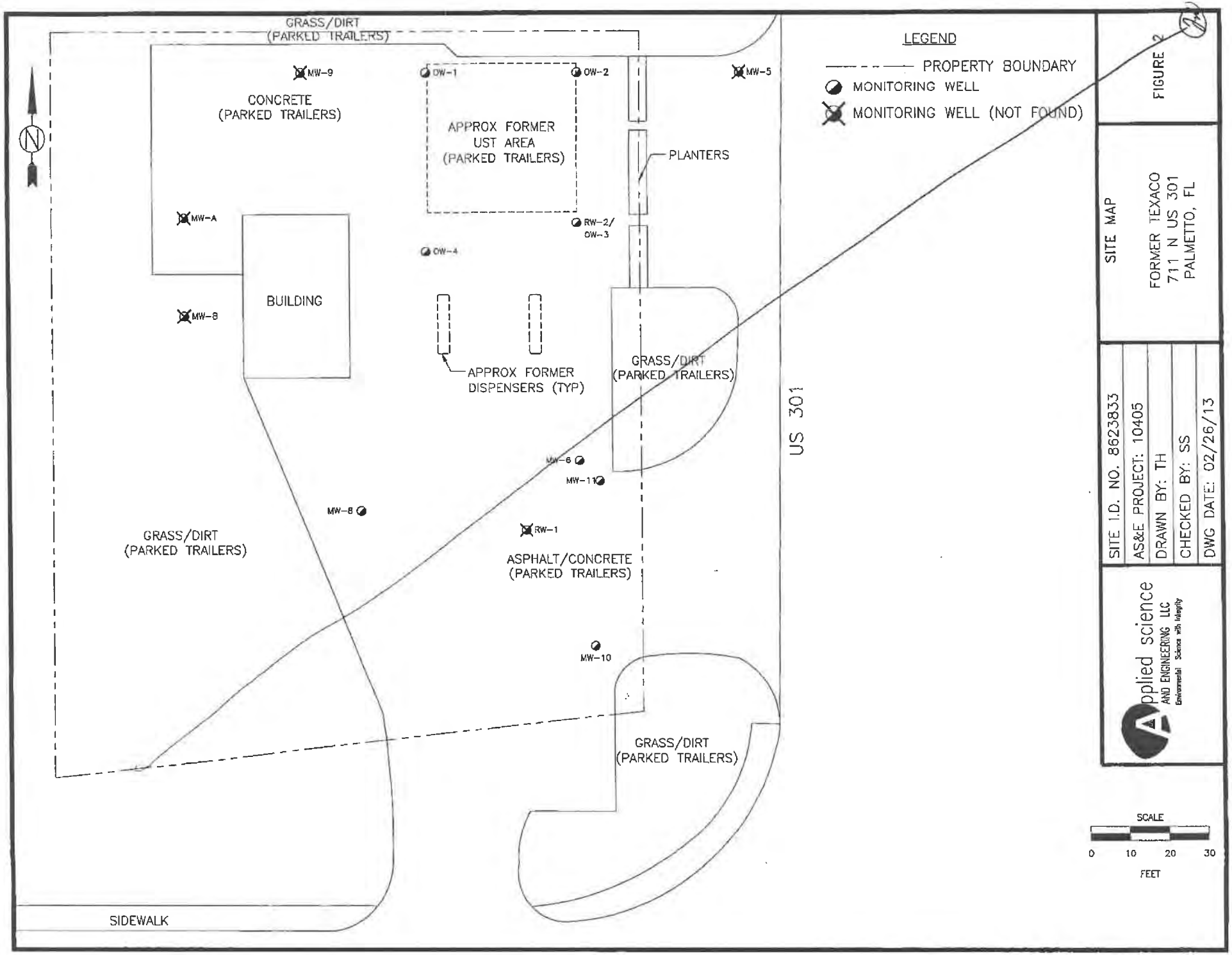
This report has been prepared for the exclusive use of the Florida Department of Environmental Protection for specific application to the referenced site in Manatee County, Florida. The assessment was conducted based on the scope of work and level of effort desired by the client and with resources adequate only for that scope of work. Our findings have been developed in accordance with generally accepted standards of geology and hydrogeology practices in the State of Florida, available information, and our professional judgment. No other warranty is expressed or implied.

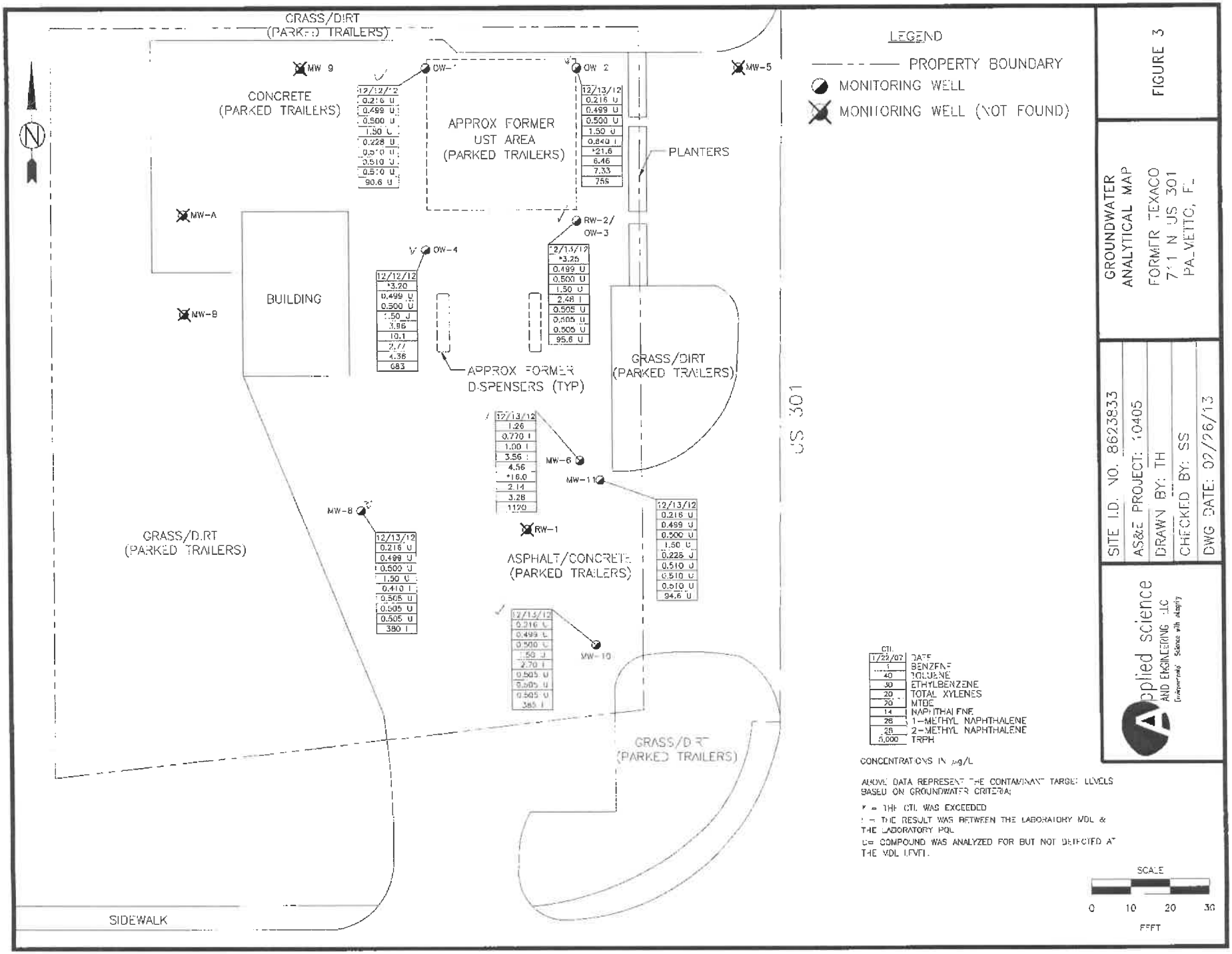
The data presented in this report is indicative of conditions existing at the precise locations sampled and at the time the samples were collected. Additionally, the data obtained from samples would be interpreted as being meaningful with respect to parameters indicated in the laboratory report. Summarized historical activities were gathered from reports generated from other consulting firms. No additional information can logically be inferred from this data.

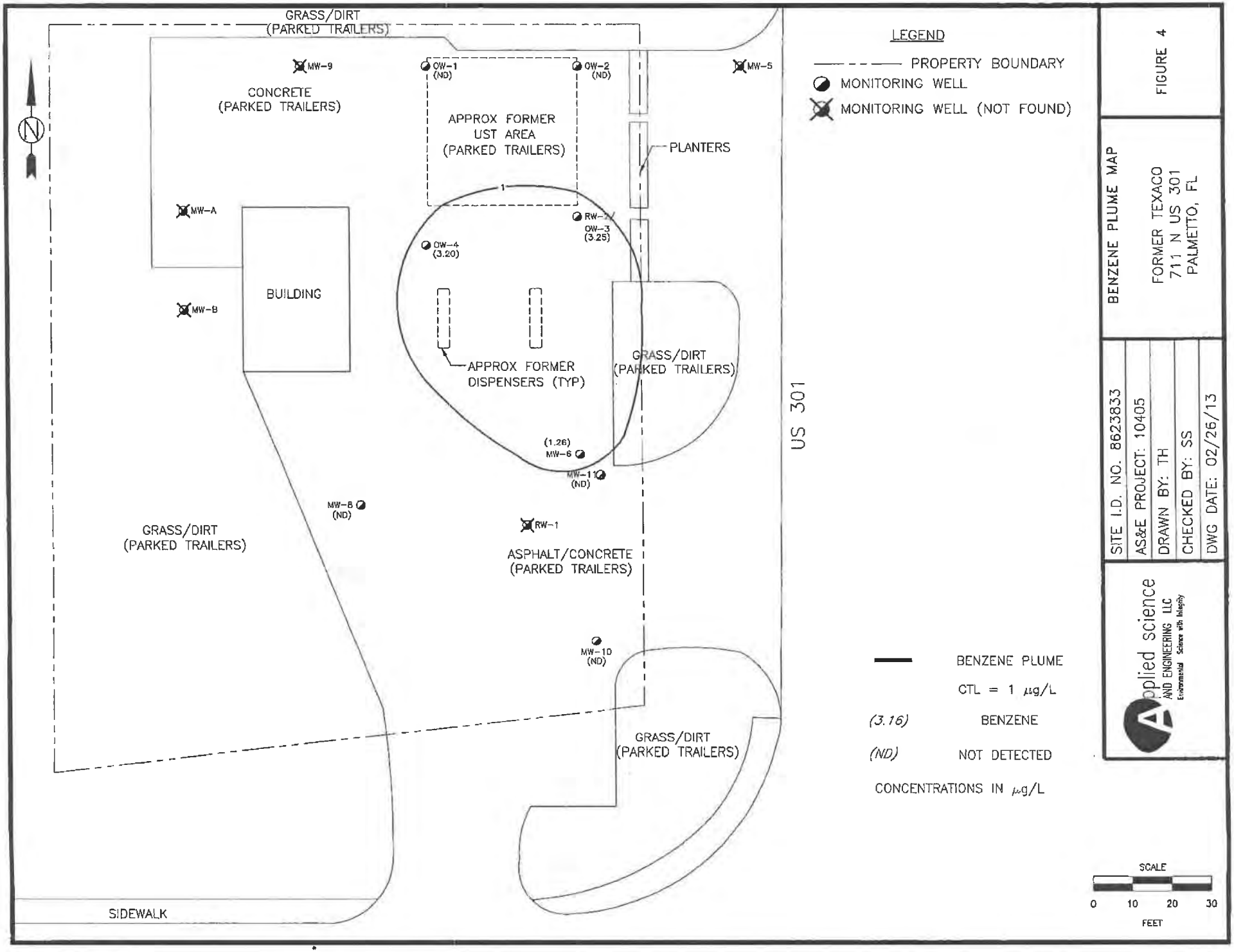
FIGURES

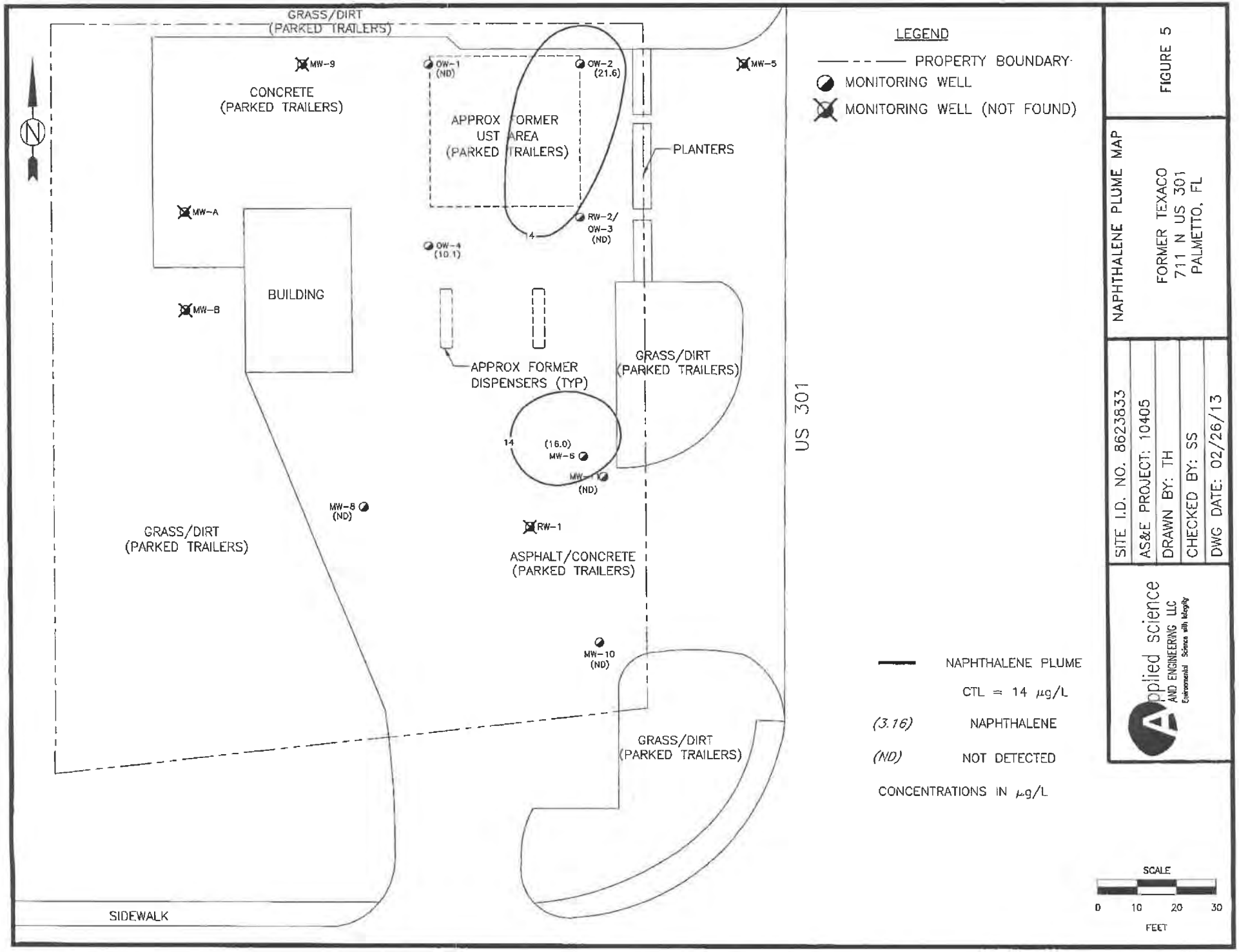


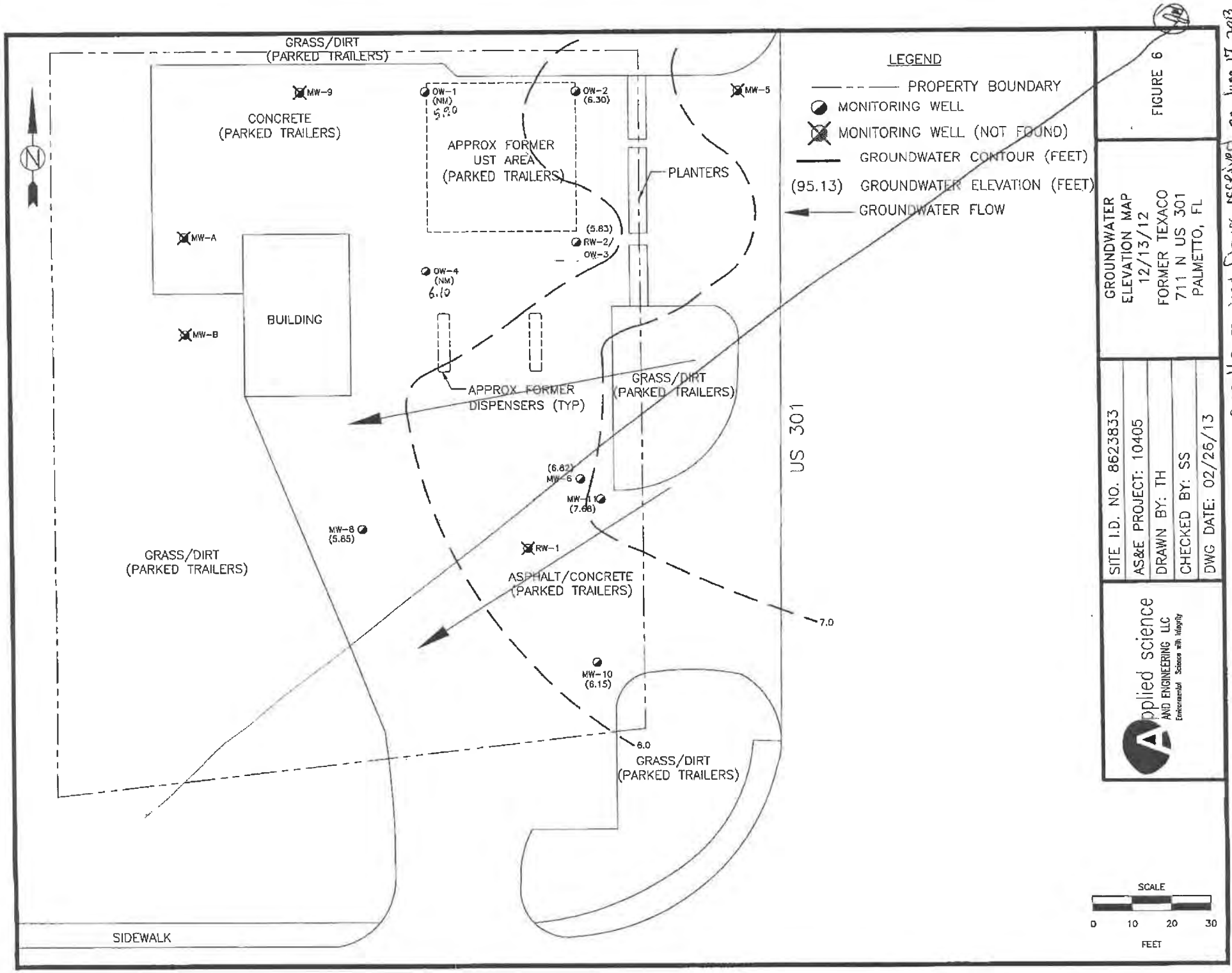
Applied science AND ENGINEERING LLC Environmental Science with Integrity	SITE I.D. NO. 8623833 PROJECT NO. 10405 DRAWN BY: TH CHECKED BY: SS DWG DATE: 02/27/13	SITE LOCATION MAP FORMER TEXACO 711 N US 301 PALMETTO, FL	FIGURE 1


GRASS/DIRT
(PARKED TRAILERS)
MW-9
OW-1
OW-2
MW-5
CONCRETE
(PARKED TRAILERS)
APPROX FORMER
UST AREA
(PARKED TRAILERS)
PLANTERS
MW-A
RW-2/
OW-3
OW-4
BUILDING
MW-8
APPROX FORMER
DISPENSERS (TYP)
GRASS/DIRT
(PARKED TRAILERS)
US 301
MW-6
MW-11
MW-8
RW-1
GRASS/DIRT
(PARKED TRAILERS)
ASPHALT/CONCRETE
(PARKED TRAILERS)
MW-10
GRASS/DIRT
(PARKED TRAILERS)
SIDEWALK
LEGEND
PROPERTY BOUNDARY
MONITORING WELL
MONITORING WELL (NOT FOUND)
FIGURE 2
SITE MAP
FORMER TEXACO
711 N US 301
PALMETTO, FL
SITE I.D. NO. 8623833
AS&E PROJECT: 10405
DRAWN BY: TH
CHECKED BY: SS
DWG DATE: 02/26/13
Applied science
AND ENGINEERING LLC
Environmental Science with Integrity
SCALE
0 10 20 30
FEET


GRASS/DIRT
(PARKED TRAILERS)
MW 9
OW-1
OW 2
MW-5
CONCRETE
(PARKED TRAILERS)
APPROX FORMER
UST AREA
(PARKED TRAILERS)
PLANTERS
MW-A
RW-2/
OW-3
OW-4
BUILDING
MW-B
APPROX FORMER
DISPENSERS (TYP)
GRASS/DIRT
(PARKED TRAILERS)
US 301
MW-6
MW-11
MW-8
RW-1
GRASS/DIRT
(PARKED TRAILERS)
ASPHALT/CONCRETE
(PARKED TRAILERS)
MW-10
GRASS/DIRT
(PARKED TRAILERS)
SIDEWALK
LEGEND
PROPERTY BOUNDARY
MONITORING WELL
MONITORING WELL (NOT FOUND)
CTL
1/22/07 DATE
1 BENZENE
40 TOLUENE
30 ETHYLBENZENE
20 TOTAL XYLENES
20 MTBE
14 NAPHTHALENE
28 1-METHYL NAPHTHALENE
28 2-METHYL NAPHTHALENE
5,000 TRPH
CONCENTRATIONS IN µg/L
ABOVE DATA REPRESENT THE CONTAMINANT TARGET LEVELS BASED ON GROUNDWATER CRITERIA;
* = THE CTL WAS EXCEEDED
I = THE RESULT WAS BETWEEN THE LABORATORY MDL & THE LABORATORY PQL
U= COMPOUND WAS ANALYZED FOR BUT NOT DETECTED AT THE MDL LEVEL.
SCALE
0 10 20 30
FEET
FIGURE 3
GROUNDWATER
ANALYTICAL MAP
FORMER TEXACO
7'1 N US 301
PA_VETTC, FL
SITE I.D. NO. 8623833
AS&E PROJECT: 10405
DRAWN BY: TH
CHECKED BY: SS
DWG DATE: 02/26/13
Applied science
AND ENGINEERING LLC
Environmentally Science with integrity


GRASS/DIRT
(PARKED TRAILERS)
MW-9
OW-1
(ND)
OW-2
(ND)
MW-5
CONCRETE
(PARKED TRAILERS)
APPROX FORMER
UST AREA
(PARKED TRAILERS)
PLANTERS
MW-A
RW-1
OW-3
(3.25)
OW-4
(3.20)
BUILDING
MW-B
APPROX FORMER
DISPENSERS (TYP)
GRASS/DIRT
(PARKED TRAILERS)
(1.26)
MW-6
MW-11
(ND)
MW-8
(ND)
RW-1
GRASS/DIRT
(PARKED TRAILERS)
ASPHALT/CONCRETE
(PARKED TRAILERS)
MW-10
(ND)
US 301
GRASS/DIRT
(PARKED TRAILERS)
SIDEWALK
LEGEND
PROPERTY BOUNDARY
MONITORING WELL
MONITORING WELL (NOT FOUND)
BENZENE PLUME
CTL = 1 µg/L
(3.16) BENZENE
(ND) NOT DETECTED
CONCENTRATIONS IN µg/L
SCALE
0 10 20 30
FEET
FIGURE 4
BENZENE PLUME MAP
FORMER TEXACO
711 N US 301
PALMETTO, FL
SITE I.D. NO. 8623833
AS&E PROJECT: 10405
DRAWN BY: TH
CHECKED BY: SS
DWG DATE: 02/26/13
Applied science
AND ENGINEERING LLC
Environmental Science with Integrity


GRASS/DIRT
(PARKED TRAILERS)
MW-9
CONCRETE
(PARKED TRAILERS)
OW-1
(ND)
OW-2
(21.6)
MW-5
APPROX FORMER
UST AREA
(PARKED TRAILERS)
PLANTERS
MW-A
RW-2/
OW-3
(ND)
14
OW-4
(10.1)
BUILDING
MW-B
APPROX FORMER
DISPENSERS (TYP)
GRASS/DIRT
(PARKED TRAILERS)
US 301
14
(16.0)
MW-6
MW-7
(ND)
MW-8
(ND)
RW-1
GRASS/DIRT
(PARKED TRAILERS)
ASPHALT/CONCRETE
(PARKED TRAILERS)
MW-10
(ND)
GRASS/DIRT
(PARKED TRAILERS)
SIDEWALK
LEGEND
PROPERTY BOUNDARY
MONITORING WELL
MONITORING WELL (NOT FOUND)
NAPHTHALENE PLUME
CTL = 14 µg/L
(3.16) NAPHTHALENE
(ND) NOT DETECTED
CONCENTRATIONS IN µg/L
SCALE
0 10 20 30
FEET
FIGURE 5
NAPHTHALENE PLUME MAP
FORMER TEXACO
711 N US 301
PALMETTO, FL
SITE I.D. NO. 8623833
AS&E PROJECT: 10405
DRAWN BY: TH
CHECKED BY: SS
DWG DATE: 02/26/13
Applied science
AND ENGINEERING LLC
Environmental Science with Integrity



See the revised figure received on June 17, 2013 in the LSSI Report Response to comments.

LSSI SITE ASSESSMENT REPORT

For

FORMER TEXACO
711 N US HIGHWAY 301
PALMETTO, FLORIDA
FDEP ID# 41/8623833

Prepared For:

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
PETROLEUM CLEANUP SECTION 1
BUREAU OF PETROLEUM STORAGE SYSTEMS
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399

Prepared By:

601 N. CONGRESS AVENUE
SUITE 103
DELRAY BEACH, FLORIDA 33445
(561) 272-8644

OCTOBER 2023

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3.1 Soil Sampling and Methodology 2
3.2 Soil Analytical Results 3

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LSSI SITE ASSESSMENT REPORT

FORMER TEXACO
711 N. US HIGHWAY 301
PALMETTO, FLORIDA
FDEP ID# 41/8623833
WORK ORDER # 2023-95-W3462B

I hereby certify that in my professional judgment, the components of this LSSI Site Assessment Report satisfy the requirements set forth in Chapter 62-780, Florida Administrative Code (FAC), and that the data incorporated in this report provide reasonable assurances of achieving the objectives stated in Chapter 62-780, FAC, for site assessment.

BTEX Engineering, Inc. hereby certifies the reliability and accuracy of the services performed in this investigation and the information presented in this report. This report is based on professional services that were conducted using sound geologic principles and "Standard of Industry" practices. Data derived through sampling and subsequent laboratory analysis are extrapolated to render an opinion about overall subsurface conditions. Actual conditions in areas not tested may differ from those inferred to exist.

David J. Chuslo, P.E.
Date: 10/24/23 Lic# 51890



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1.0 INTRODUCTION

BTEX Engineering, Inc. (BTEX) is pleased to submit this LSSI Site Assessment Report to the Florida Department of Environmental Protection (FDEP) for Former Texaco located at 711 N. US Highway 301 in Palmetto, Florida. This site is eligible for cleanup funding assistance under the FDEP Petroleum Restoration Program. On May 9, 2023, the FDEP issued Preapproval Work Order No. 2023-95-W3462B for Supplemental Site Assessment of the site under the Low-Scored Site Initiative (LSSI) Program. This report was prepared in accordance with the FDEP Chapter 62-780.600, of the Florida Administrative Code (FAC), effective 2013, for site assessment of petroleum contaminated sites. A site map is provided as **Figure 1**.

2.0 SITE HISTORY

The site had one reported discharge on August 22, 1987 that is Early Detection Incentive (EDI) eligible. The current site score is 6. The Site was sold by Motiva Enterprises, an oil company, to the current owner in 2004. Four (4) underground storage tanks (USTs) were registered onsite: three (3) 8,000-gallon USTs containing unleaded gasoline and one (1) 550-gallon UST containing waste oil. No information exists on FDEPs Oculus database as to when the USTs were removed. A discharge was reported on August 22, 1987 based on Groundwater Cleanup Target Levels (GCTLs) exceedances in OW-1, which is located in the former gasoline UST area. Little information was available on Oculus regarding the waste oil tank area except that it was located approximately 15 feet south of the northwest corner of the building.

A site assessment was conducted from 1987 to 1988 by Groundwater Technology Inc. Soil contamination was reported in samples collected at wells OW-3 and piezometers 1,2 and 3 which were located to the southwest of the dispenser area. Benzene concentrations ranged from two (2) to eight (8) ppm. Initial remedial action included a source removal; 35yds3 of contaminated soil were removed from the UST and product line areas. Groundwater was reported as impacted in all wells except MW-8, MW-9 and MW-10.

A groundwater remediation system was installed in 1991 consisting of two recovery wells, an air stripping tower, and a discharge of treated water to an infiltration gallery. The most recent report on Oculus was a Remedial Action Report from 1995. Analytical results indicated observation well OW-4 had several analytes above Natural Attenuation Default Concentrations (NADCs). Concentrations in OW-4 were; benzene 407 ug/L, Toluene 30 ug/L, ethylbenzene 203 ug/L, Total Xylenes 739 ug/L, and MTBE 36 ug/L.

Additional assessment was completed by Applied Science and Engineering, LLC (AS&E) at the site on December 13, 2012. No soil assessment was completed during these activities. Groundwater analytical results for monitoring wells OW-3 and MW-4 located in the former UST area indicated benzene concentrations above GCTLs. In addition, groundwater analytical results for monitoring wells OW-2 and MW-6 located in the former dispenser area indicated Naphthalene concentrations above GCTLs. Groundwater flow direction was to the west. AS&E recommended that the site remain in the EDI program until funding becomes available based on priority score. The LSSI Report was submitted on March 4, 2013 and approved by the FDEP on September 19, 2013.

A site visit was not completed however, several existing monitoring wells (from the LSSI activities completed in 2013) appear to be present at the site from review of Google maps.

Soil and groundwater assessment activities were completed as follows.

3.0 SOIL SAMPLING

3.1 Soil Sampling Methodology

On May 25, 2023, BTEX Engineering, Inc., J&C Drilling, LCC, and the FDEP completed a Predrilling meeting to discuss the June 8, 2023 soil boring and monitoring well installation activities.

On June 8, 2023, J&C Drilling, LCC (J&C Drilling), a Florida licensed drilling company, completed twenty-four (24) soil borings (SB-1 through SB-24) in the area of the former UST. The borings were completed to a total depth of 5 feet below land surface (bls).

Soil samples were collected from the soil boring locations in 1-foot and 2-foot increments from the land surface to approximately 6 feet bls. The water table was encountered at approximately 3-4 feet bls during the soil boring activities. The lithology encountered was tan/gray to brown fine to medium grain sand from 0 feet to 5 feet bls. The borings completed on the western side of the former UST area the lithology encountered was black medium grain sand with clay from 0 feet to 5 feet bls The soil boring locations are illustrated on **Figure 1.** Soil Boring Logs have been included in **Appendix A.**

Soil samples were screened for total organic vapors using a Tiger Ion PID toxic vapor analyzer equipped with a photo ionization detector (PID). The PID was calibrated in accordance with the manufacturer's recommendations. The maximum corrected PID readings in the vadose zone was 2313 ppm at the 1-2' interval from SB-2. A summary of soil screening results is summarized on **Table 1** and shown on **Figure 2.**

On June 8, 2023, four (4) soil samples, SB-2 (1-2'), SB-4 (2-3'), SB-12 (Tank Farm) (0-2') and SB-19 (1-2') were collected for laboratory analysis. Soil sampling performed as a part of the scope of work of this investigation was conducted in general accordance with FDEP Standard Operating Procedures (SOP) for Field Activities (DEP-SOP-001/01), as referenced in Chapter 62-160, FAC.

The soil samples were collected for laboratory analysis and immediately transferred into laboratory designated bottles. The samples were collected for analysis of volatile organic aromatics (VOAs) by EPA Method 8260, polynuclear aromatic hydrocarbons (PAHs) by Method 8270 and total recoverable petroleum hydrocarbons (TRPH) using FL-PRO. The samples were also collected for analysis for Synthetic Precipitation Leaching Procedures (SPLP) via EPA Method 1312 and for the fractionation of TRPH via MADEP and placed on hold. The soil samples were immediately packed on ice and transported to Eurofins Orlando (Eurofins) for laboratory analysis.

3.2 Soil Analytical Results

Results of the laboratory analysis indicated concentrations below Soil Cleanup Target Levels (SCTLs) in all soil samples collected on June 8, 2023.

Laboratory analytical results of the soil samples are summarized on **Table 2** and shown on **Figure 3** and **Figure 4**. Copies of the laboratory report and chain of custody form are provided in **Appendix B.**

4.0 GROUNDWATER EVALUATION

4.1 Monitoring Well Installation

On September 21, 2023, BTEX personnel supervised the installation of three (3) shallow monitoring wells (MW-12, MW-13 and MW-14). The wells were installed by J&C Drilling. Well Construction and Development Logs are included in **Appendix A**.

Monitoring well MW-12 through MW-14 were installed to a total depth of 12 feet and consisted of 2 feet of two-inch diameter solid PVC casing and 10 feet of two-inch diameter 0.010" slotted pre-packed PVC screen. The wells were purged until the groundwater was clear.

4.2 Evaluation of Groundwater Elevation

On June 8, 2023, BTEX personnel collected Depth to Water (DTW) measurements from eight (8) existing monitoring wells (MW-6, MW-8, MW-10, MW-11 and OW-1 through OW-4). The DTW ranged from 1.09 to 2.93 feet bls. Review of the water table elevations (WTEs) within the shallow intervals indicates an apparent westerly hydraulic gradient.

On September 28, 2023, BTEX personnel collected DTW measurements from the three (3) newly installed monitoring wells (MW-12, MW-13 and MW-14). The DTW ranged from 2.01 to 2.57 feet bls. Review of the WTEs within the shallow intervals indicates an apparent easterly hydraulic gradient.

Depth-to-water measurements were collected utilizing a Heron Dripper-T electronic water level meter capable of detecting measurements of up to 1/100 of a foot in accuracy. The depth-to-water measurements, top-of-casing elevations and calculated water table elevations WTEs are summarized in **Table 3**. The WTEs are illustrated on **Figure 5** and **Figure 5a**.

4.3 Groundwater Sampling

On June 8, 2023, BTEX personnel collected groundwater samples from the eight (8) existing monitoring wells (MW-6, MW-8, MW-10, MW-11 and OW-1 through OW-4).

On September 28, 2023, BTEX personnel collected groundwater samples from the three (3) newly installed monitoring wells (MW-12, MW-13 and MW-14).

Purging and sampling of the wells was conducted in general accordance with the FDEP Standard Operating Procedures for Field Procedures (DEP-SOP-001/01) as referenced in Chapter 62-160, F.A.C. On June 8 and September 28, 2023 groundwater samples were collected for analyses for VOAs via EPA Method 8260C, PAHs via EPA Method 8270 and TRPH by FL-PRO. Samples were immediately placed on ice and transported to Eurofins for analytical testing.

4.4 Groundwater Analytical Results

Laboratory analysis of the groundwater samples collected on June 8, 2023, reported Naphthalene (23 ug/L) levels above GCTLs in MW-6. The remaining monitoring wells sampled reported levels below GCTLs.

Laboratory analysis of the samples collected on September 28, 2023 reported levels above GCTLs in:

- MW-12 for Benzene (32 ug/L) and 2-Methylnaphthalene (31 ug/L)
- MW-13 for Naphthalene (16 ug/L), 1-Methylnaphthalene (50 ug/L) and 2-Methylnaphthalene (47 ug/L)
- MW-14 for Naphthalene (74 ug/L)

In addition, levels were detected above NADCs in:

- MW-12 for Naphthalene (150 ug/L)

Groundwater analytical data is summarized in **Table 4** and illustrated on **Figure 6** and **Figure 7**. The laboratory analytical reports and chain of custody documentation are included in **Appendix B**. The FDEP groundwater sampling and equipment calibration logs are included in **Appendix C**. A Site Characterization Screen Sheet, predrilling meeting notes and the field notes are included in **Appendix D**.

5.0 CONCLUSIONS

Results of the soil laboratory analysis indicated concentrations below SCTLs in all soil samples collected on June 8, 2023.

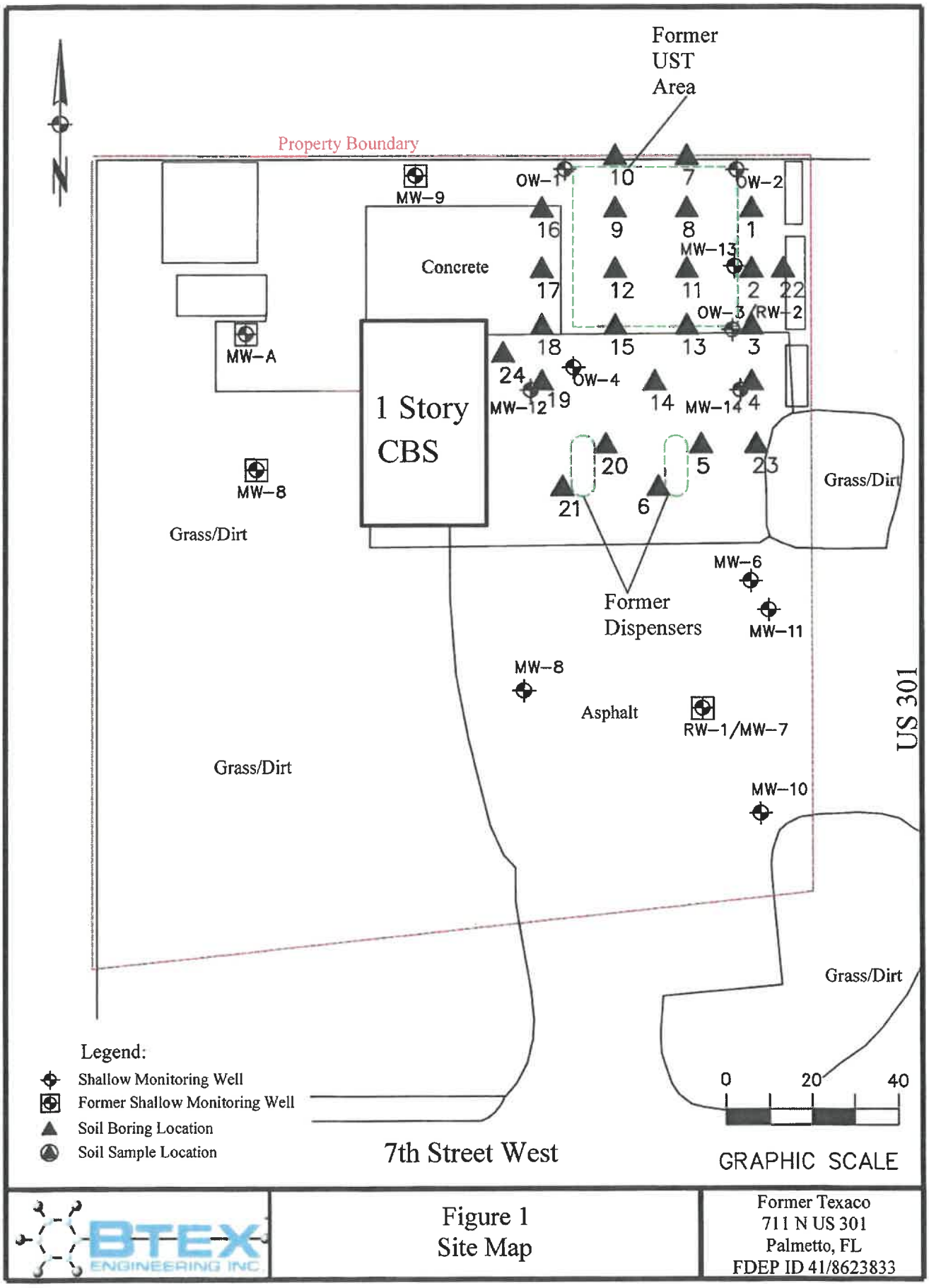
Laboratory analysis of the groundwater samples collected on June 8, 2023, reported levels above GCTLs in MW-6. The remaining monitoring wells sampled reported levels below GCTLs.

Laboratory analysis of the groundwater samples collected on September 28, 2023, reported levels above GCTLs in all the newly installed monitoring wells (MW-12 through MW-14). In addition, Naphthalene levels were reported above NADCs in MW-12.

6.0 RECOMMENDATIONS

Based on the groundwater analytical results, BTEX is recommending a new work order be issued in order to install one (1) deep monitoring well near MW-12, one (1) shallow monitoring well west of MW-12 and two (2) shallow monitoring wells along the eastern property boundary to delineate the groundwater plume horizontally and vertically. The proposed monitoring well locations are illustrated on **Figure 8**.

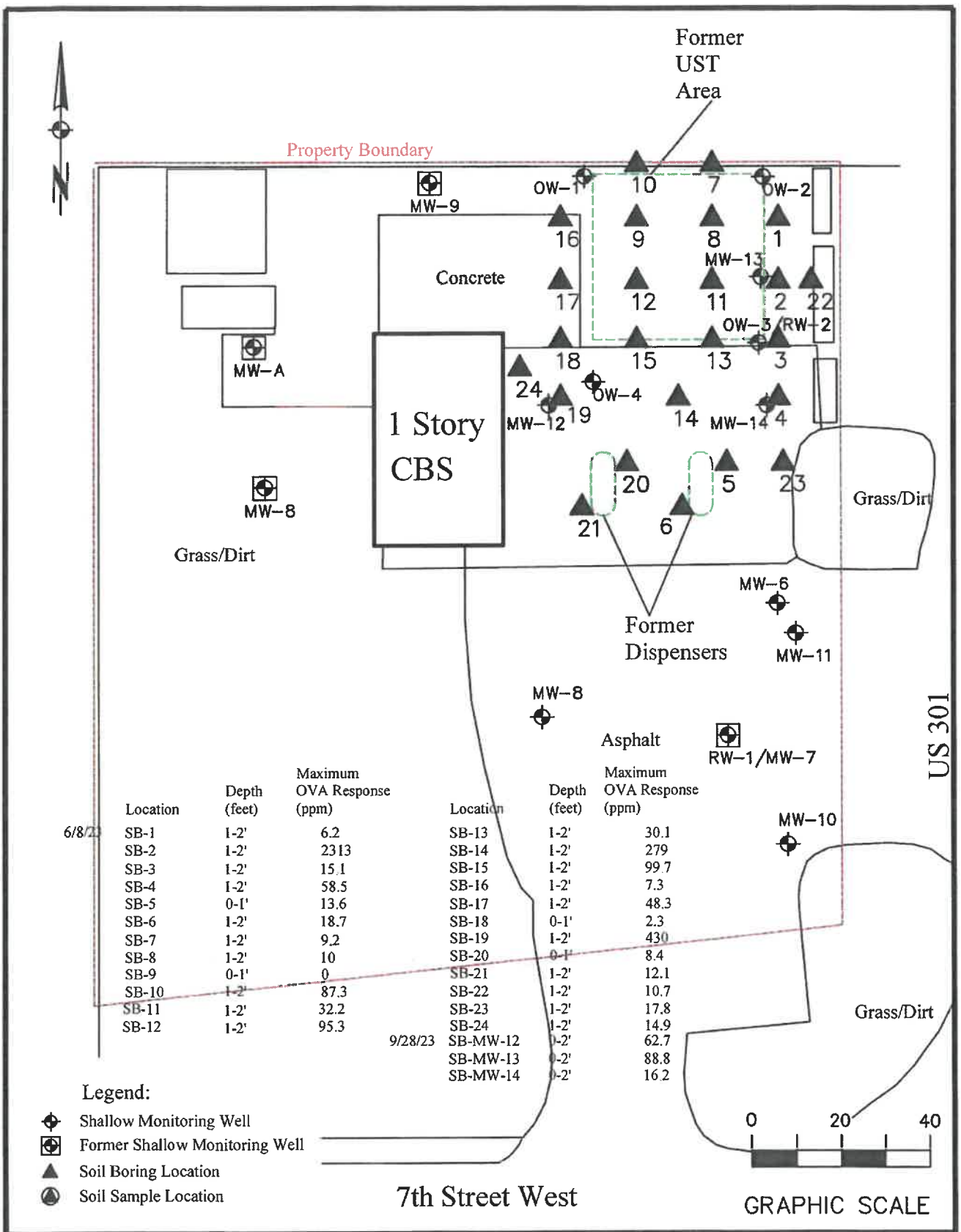
FIGURES



BTEX ENGINEERING INC

Figure 1
Site Map

Former Texaco
711 N US 301
Palmetto, FL
FDEP ID 41/8623833

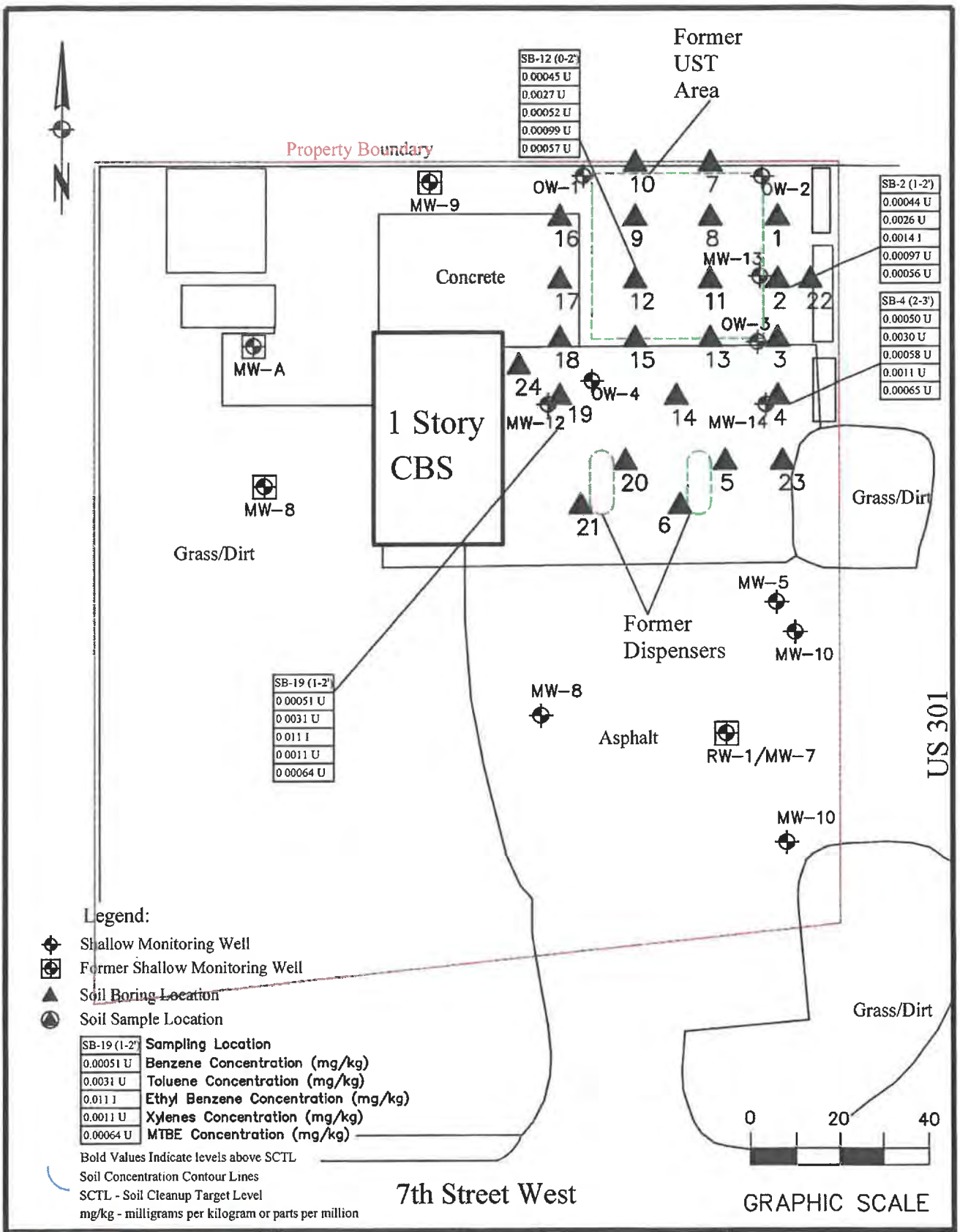


	Location	Depth (feet)	Maximum OVA Response (ppm)
6/8/23	SB-1	1-2'	6.2
	SB-2	1-2'	2313
	SB-3	1-2'	15.1
	SB-4	1-2'	58.5
	SB-5	0-1'	13.6
	SB-6	1-2'	18.7
	SB-7	1-2'	9.2
	SB-8	1-2'	10
	SB-9	0-1'	0
	SB-10	1-2'	87.3
	SB-11	1-2'	32.2
	SB-12	1-2'	95.3
	SB-13	1-2'	30.1
	SB-14	1-2'	279
	SB-15	1-2'	99.7
	SB-16	1-2'	7.3
	SB-17	1-2'	48.3
	SB-18	0-1'	2.3
	SB-19	1-2'	430
	SB-20	0-1'	8.4
	SB-21	1-2'	12.1
	SB-22	1-2'	10.7
	SB-23	1-2'	17.8
	SB-24	1-2'	14.9
9/28/23	SB-MW-12	0-2'	62.7
	SB-MW-13	0-2'	88.8
	SB-MW-14	0-2'	16.2

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Figure 2
Soil Vadose OVA Data
June 8 and September 28, 2023

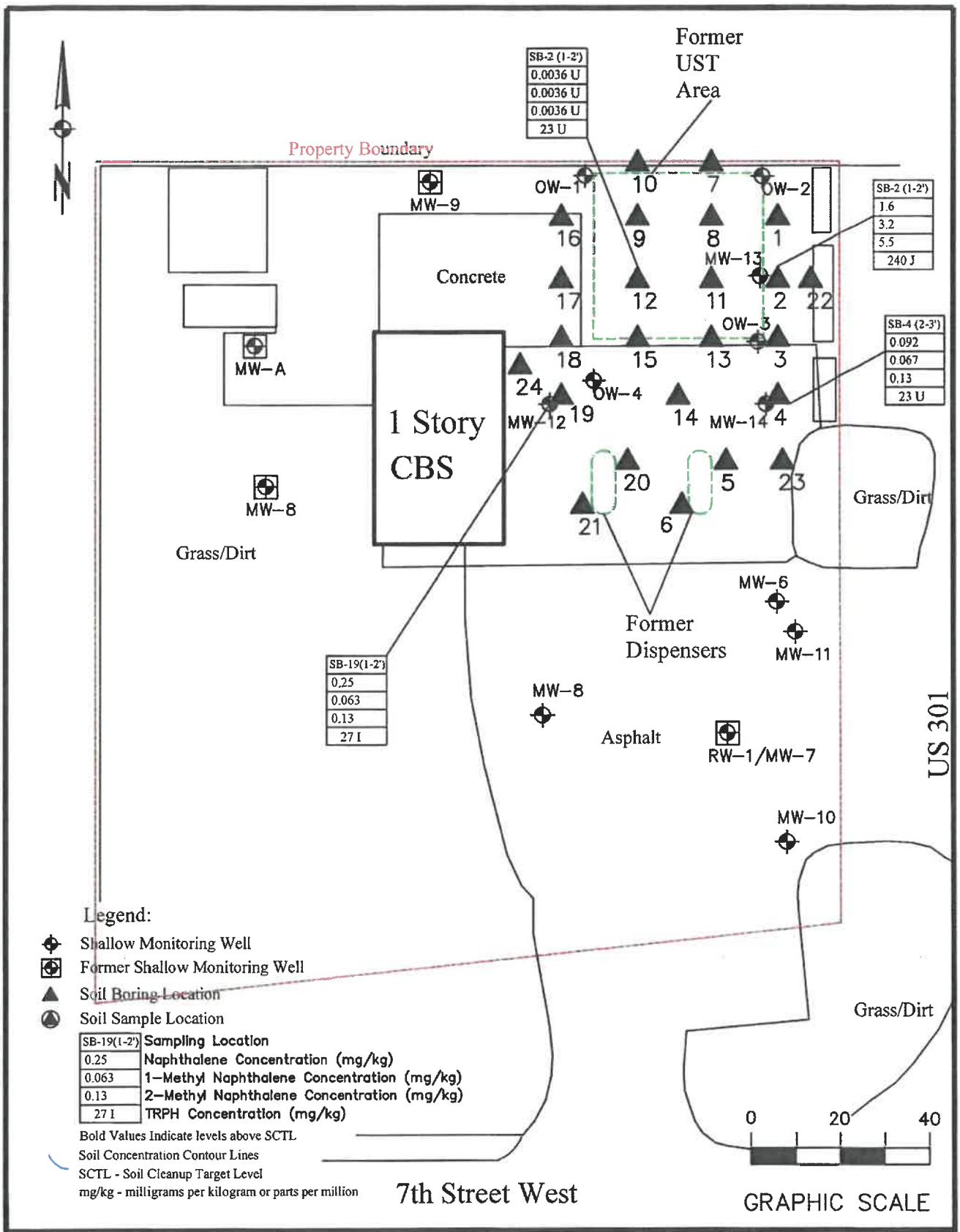
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Palmetto, FL
FDEP ID 41/8623833



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Figure 3
Soil VOA Concentration Map
June 8, 2023

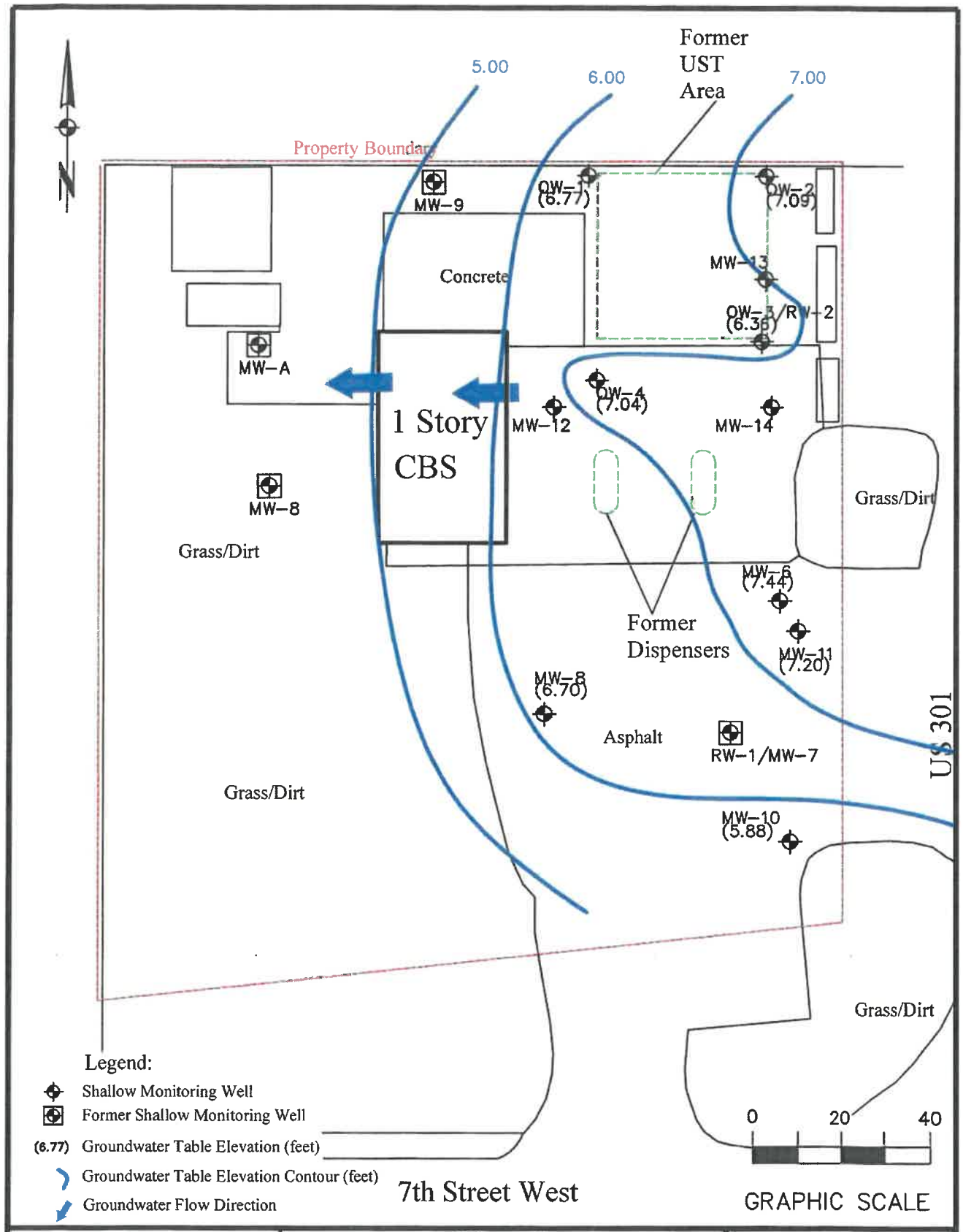
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Palmetto, FL
FDEP ID 41/8623833



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Figure 4
Soil PAH Concentration Map
June 8, 2023

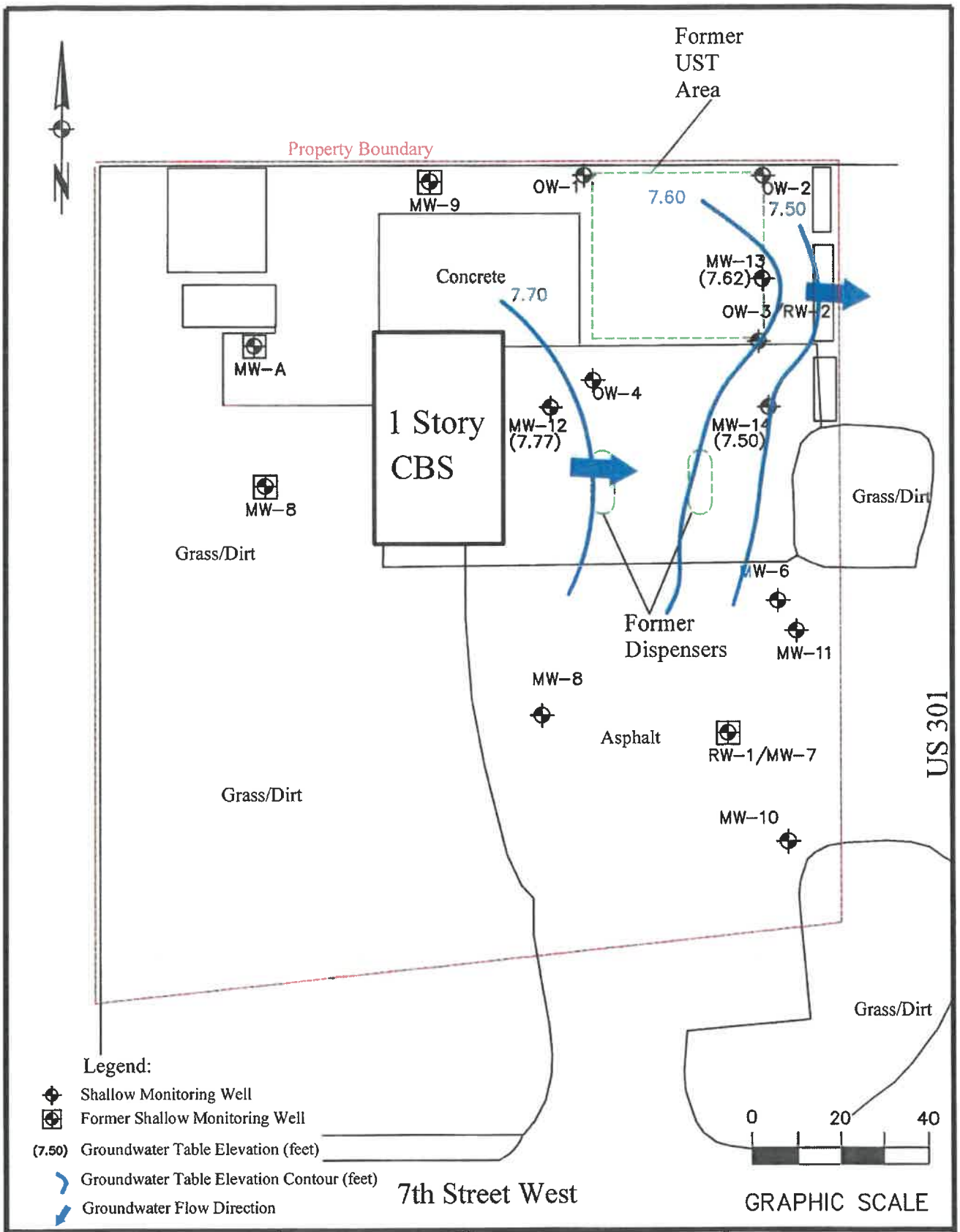
Former Texaco
711 N US 301
Palmetto, FL
FDEP ID 41/8623833



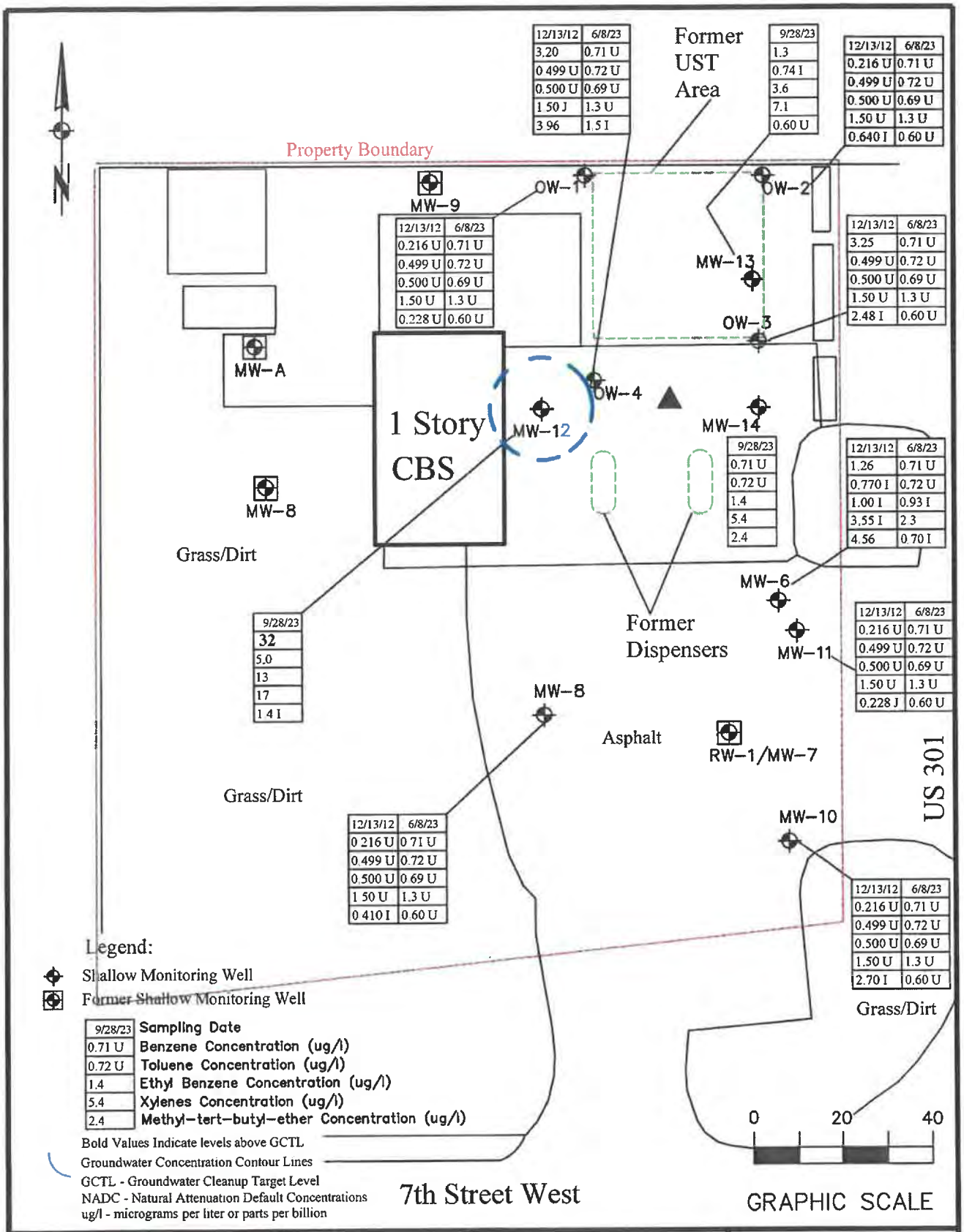
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Figure 5
Groundwater Elevation Map
June 8, 2023

Former Texaco
711 N US 301
Palmetto, FL
FDEP ID 41/8623833



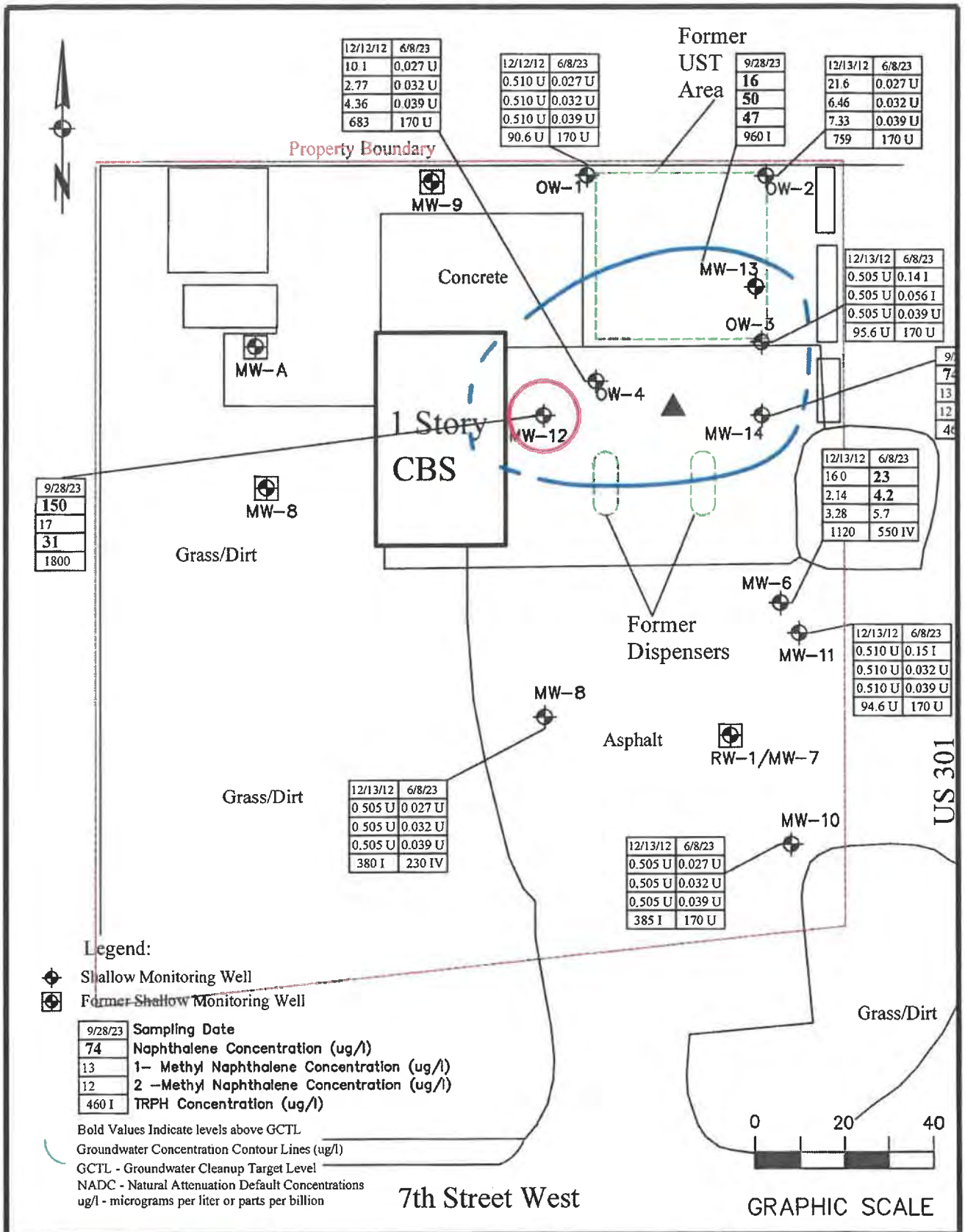
BTEX ENGINEERING INC.	Figure 5a Groundwater Elevation Map September 28, 2023	Former Texaco 711 N US 301 Palmetto, FL FDEP ID 41/8623833



BTEX ENGINEERING INC.

Figure 6
Groundwater VOA Concentration Map
September 28, 2023

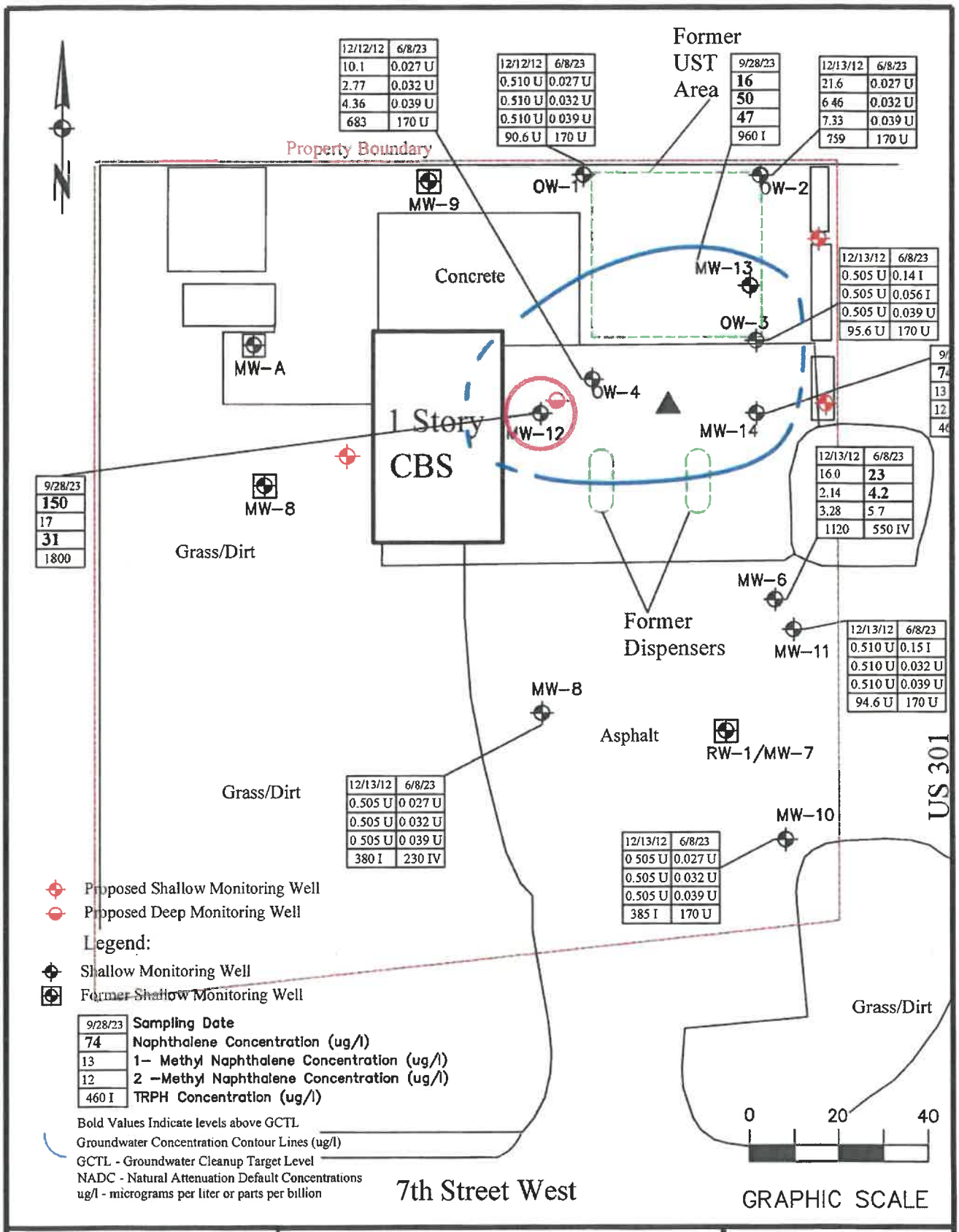
Former Texaco
711 N US 301
Palmetto, FL
FDEP ID 41/8623833



BTEX ENGINEERING INC

Figure 7
Groundwater PAH Concentration Map
September 28, 2023

Former Texaco
711 N US 301
Palmetto, FL
FDEP ID 41/8623833



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Figure 8
Proposed Monitoring Well Locations

Former Texaco
711 N US 301
Palmetto, FL
FDEP ID 41/8623833

Site No. 55

Citgo-Palmetto

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/24/2026 | Last Data Refresh: 03/23/2026 | Report Generated from DOPPLER

District	Southwest	**Type**	Retail Station
County	Manatee	**Status**	OPEN
ID	8624235	**Latitude**	27° 31' 15.3238
Name	CITGO-PALMETTO 203 10TH ST W PALMETTO, FL 33561	**Longitude**	82° 33' 55.9826
		LL Method	DPHO
Contact	SAMMY SAMAD	**LL Status**	REVIEWED
Phone	(941) 723-6002	**Status Date**	11/14/2003

Account Owner Information

Name	SAMAD HOLDINGS LLC 203 10TH ST W PALMETTO, FL 34221	**Effective Date**	06/03/2013
Contact	SAMMY SAMAD		
Phone	(941) 447-6625		
Email	EASTSIDE114@YAHOO.COM	**Placard # / Date**	723519 - 06/26/2025

Property Owner Information

Name	SAMAD HOLDINGS LLC 203 10TH ST W PALMETTO, FL 34221	**Effective Date**	06/03/2013
Contact	SAMMY SAMAD		
Phone	(941) 447-6625		
Email	EASTSIDE114@YAHOO.COM		

Tank	Tank Size	Content	Installed	Placement	Status
14	10000	Unleaded Gas (B)	07/01/2004	UNDERGROUND	In Service (U)

Constructions
(A) Ball check valve
(C) Steel
(F) Fiberglass clad steel
(I) Double wall
(M) Spill containment bucket
(O) Tight fill
(P) Level gauges/alarms

Pipings
(C) Fiberglass
(F) Double wall
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(2) Visual inspect pipe sumps
(4) Visual inspect dispenser liners
(F) Monitor dbl wall tank space
(H) Mechanical line leak detector
(K) Monitor dbl wall pipe space

Tank	Tank Size	Content	Installed	Placement	Status
15	10000	Unleaded Gas (B)	07/01/2004	UNDERGROUND	In Service (U)

Constructions
(A) Ball check valve
(C) Steel
(F) Fiberglass clad steel
(I) Double wall
(M) Spill containment bucket
(O) Tight fill
(P) Level gauges/alarms

Pipings
(C) Fiberglass
(F) Double wall
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(2) Visual inspect pipe sumps
(4) Visual inspect dispenser liners
(F) Monitor dbl wall tank space
(H) Mechanical line leak detector
(K) Monitor dbl wall pipe space

Tank	Tank Size	Content	Installed	Placement	Status
16	10000	Unleaded Gas (B)	07/01/2004	UNDERGROUND	In Service (U)

Constructions
(A) Ball check valve
(C) Steel
(F) Fiberglass clad steel
(I) Double wall
(M) Spill containment bucket
(O) Tight fill
(P) Level gauges/alarms

Pipings
(C) Fiberglass
(F) Double wall
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(2) Visual inspect pipe sumps
(4) Visual inspect dispenser liners
(F) Monitor dbl wall tank space
(H) Mechanical line leak detector
(K) Monitor dbl wall pipe space

Tank	Tank Size	Content	Installed	Placement	Status
1	8000	Vehicular Diesel (D)	07/01/1978	UNDERGROUND	Removed from Site (B)

Constructions
(A) Ball check valve
(B) Internal lining
(C) Steel
(M) Spill containment bucket
(N) Flow shut-Off

Pipings
(C) Fiberglass
(F) Double wall
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(2) Visual inspect pipe sumps
(4) Visual inspect dispenser liners
(H) Mechanical line leak detector
(S) Statistical Inventory Reconcile

Tank	Tank Size	Content	Installed	Placement	Status
10	4000	Kerosene (K)	07/01/1987	UNDERGROUND	Removed from Site (B)

Constructions
(A) Ball check valve
(F) Fiberglass clad steel
(M) Spill containment bucket
(N) Flow shut-Off

Pipings
(C) Fiberglass
(I) Suction piping system

Monitorings
(2) Visual inspect pipe sumps
(4) Visual inspect dispenser liners
(S) Statistical Inventory Reconcile
(V) Suction pump check valve

Tank	Tank Size	Content	Installed	Placement	Status
2	4000	Leaded Gas (A)	07/01/1978	UNDERGROUND	Removed from Site (B)

Constructions
(C) Steel

Pipings
(C) Fiberglass

Monitorings
(Y) Unknown

Tank	Tank Size	Content	Installed	Placement	Status
3	4000	Leaded Gas (A)	07/01/1970	UNDERGROUND	Removed from Site (B)

Constructions
(C) Steel

Pipings
(C) Fiberglass

Monitorings
(Y) Unknown

Tank	Tank Size	Content	Installed	Placement	Status
4	4000	Leaded Gas (A)	07/01/1970	UNDERGROUND	Removed from Site (B)

Constructions
(C) Steel

Pipings
(C) Fiberglass

Monitorings
(Y) Unknown

Tank	Tank Size	Content	Installed	Placement	Status
5	4000	Leaded Gas (A)	07/01/1970	UNDERGROUND	Removed from Site (B)

Constructions
(C) Steel

Pipings
(C) Fiberglass

Monitorings
(Y) Unknown

Tank	Tank Size	Content	Installed	Placement	Status
6	4000	Leaded Gas (A)	07/01/1970	UNDERGROUND	Removed from Site (B)

Constructions
(C) Steel

Pipings
(C) Fiberglass

Monitorings
(Y) Unknown

Tank	Tank Size	Content	Installed	Placement	Status
7	8000	Unleaded Gas (B)	07/01/1987	UNDERGROUND	Removed from Site (B)

Constructions
(A) Ball check valve
(F) Fiberglass clad steel
(M) Spill containment bucket
(N) Flow shut-Off

Pipings
(C) Fiberglass
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(2) Visual inspect pipe sumps
(4) Visual inspect dispenser liners
(H) Mechanical line leak detector
(S) Statistical Inventory Reconcile

Tank	Tank Size	Content	Installed	Placement	Status
8	8000	Unleaded Gas (B)	07/01/1987	UNDERGROUND	Removed from Site (B)

Constructions
(A) Ball check valve
(F) Fiberglass clad steel
(M) Spill containment bucket
(N) Flow shut-Off

Pipings
(C) Fiberglass
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(2) Visual inspect pipe sumps
(4) Visual inspect dispenser liners
(H) Mechanical line leak detector
(S) Statistical Inventory Reconcile

Tank	Tank Size	Content	Installed	Placement	Status
9	8000	Unleaded Gas (B)	07/01/1987	UNDERGROUND	Removed from Site (B)

Constructions
(A) Ball check valve
(F) Fiberglass clad steel
(M) Spill containment bucket
(N) Flow shut-Off

Pipings
(C) Fiberglass
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(2) Visual inspect pipe sumps
(4) Visual inspect dispenser liners
(H) Mechanical line leak detector
(S) Statistical Inventory Reconcile

Tank	Tank Size	Content	Installed	Placement	Status
11	4000	Unknown/Not Reported (Y)		UNDERGROUND	Removed from Site (B)

Constructions

Pipings

Monitorings

Tank	Tank Size	Content	Installed	Placement	Status
12	4000	Unknown/Not Reported (Y)		UNDERGROUND	Removed from Site (B)

Constructions **Pipings** **Monitorings**

Tank	Tank Size	Content	Installed	Placement	Status
13	4000	Unknown/Not Reported (Y)		UNDERGROUND	Removed from Site (B)

Constructions **Pipings** **Monitorings**

Insurance Documents

FR Type	Effective Date	Expiration Date	Company Name
INSURANCE	05/16/2023	05/16/2024	COMMERCE AND INDUSTRY INSURANCE COMPANY
INSURANCE	05/16/2022	05/16/2023	COMMERCE AND INDUSTRY INSURANCE COMPANY
INSURANCE	05/16/2021	05/16/2022	COMMERCE & INDUSTRY INSURANCE CO
INSURANCE	05/16/2017	05/16/2018	COMMERCE & INDUSTRY
INSURANCE	05/16/2016	05/16/2017	COMMERCE & INDUSTRY
INSURANCE	05/16/2015	05/16/2016	COMMERCE & INDUSTRY
INSURANCE	09/28/2012	09/28/2013	COMMERCE & INDUSTRY
INSURANCE	09/28/2011	09/28/2012	COMMERCE & INDUSTRY
INSURANCE	09/28/2010	09/28/2011	COMMERCE & INDUSTRY
INSURANCE	09/28/2009	09/28/2010	COMMERCE & INDUSTRY
INSURANCE	09/28/2008	09/28/2009	COMMERCE & INDUSTRY

System Tests

Type	Due Date
INTEGRITY TEST - STP SUMP	05/08/2025
INTEGRITY TEST - STP SUMP	06/19/2026
INTEGRITY TEST - PIPING SUMP	05/08/2025
INTEGRITY TEST - DISPENSER SUMP	05/08/2025
INTEGRITY TEST - DISPENSER SUMP	06/19/2026
INTEGRITY TEST - DISPENSER SUMP	05/08/2025
INTEGRITY TEST - DOUBLE-WALLED SPILL BUCKET	06/19/2026
INTEGRITY TEST - SINGLE-WALLED SPILL BUCKET	05/08/2023

ANNUAL OPERABILITY - OVERFILL PROTECTION	06/02/2022
ANNUAL OPERABILITY - OVERFILL PROTECTION	06/19/2024
ANNUAL OPERABILITY - OVERFILL PROTECTION	05/08/2023
ANNUAL OPERABILITY - LINE LEAK DETECTOR	06/02/2022
ANNUAL OPERABILITY - LINE LEAK DETECTOR	06/19/2024

Legacy Compliance Activity Information

Activity Code	Date Initiated	Date Completed	Results	Inspector	AST/UST Count	Description
TCI	04/10/2006	04/12/2006	IN-COMPLIANCE	MARK TRETHEWEY	0/3	COMPLIANCE ASSURANCE
TCI	05/16/2005	05/19/2005	IN-COMPLIANCE	MARK TRETHEWEY	0/3	COMPLIANCE ASSURANCE
	Completion Notes IN COMPLIANCE					
TIN	08/06/2004	08/06/2004	IN-COMPLIANCE	SEGO	0/3	COMPLIANCE ASSURANCE
RRBD	02/28/2004	03/25/2004				COMPLIANCE ASSURANCE
TCI	01/16/2004	02/09/2004	MINOR OUT-OF-COMPLIANCE	SEGO	0/4	COMPLIANCE ASSURANCE
TCR	06/04/2003	06/23/2003	IN-COMPLIANCE			COMPLIANCE ASSURANCE
TCI	03/17/2003	04/08/2003	MINOR OUT-OF-COMPLIANCE	SEGO	0/5	COMPLIANCE ASSURANCE
RRBD	02/12/2003	05/20/2003				DISCHARGE PROJECT
TDI	02/06/2003	02/14/2003	SIGNIFICANT OUT-OF-COMPLIANCE	SEGO	0/5	DISCHARGE PROJECT
TCI	02/13/2002	02/26/2002	IN-COMPLIANCE	FIELDS	0/5	COMPLIANCE ASSURANCE
TDI	01/31/2002	02/07/2002	IN-COMPLIANCE	POUSO	0/5	DISCHARGE PROJECT

DRFR	01/31/2002	02/07/2002		POUSO	0/5	DISCHARGE PROJECT
NCLI	04/06/2001	04/06/2001				COMPLIANCE ASSURANCE
TCI	03/14/2001	04/05/2001	SIGNIFICANT OUT-OF-COMPLIANCE	FIELDS	0/5	COMPLIANCE ASSURANCE
NCLI	08/03/1999	08/03/1999		BROWNING	0/0	COMPLIANCE ASSURANCE
TCI	07/22/1999	08/04/1999	MINOR OUT-OF-COMPLIANCE	BROWNING	0/5	COMPLIANCE ASSURANCE
TIN	03/29/1999	04/12/1999	MINOR OUT-OF-COMPLIANCE	BROWNING	0/5	COMPLIANCE ASSURANCE

Compliance Activity Information

Activity Code	Date Completed	Results	Inspector	AST/UST Count	Description
Record Document	02/29/2024	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Letter	02/29/2024	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Letter	02/16/2024	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	02/16/2024	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	02/16/2024	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Site Inspection	02/09/2024	In Compliance	TRETHEWEY_MB_1	0/3	Complaint
Letter	02/09/2024	Satisfied	TRETHEWEY_MB_1		Complaint
Enforcement Tracking	06/01/2023	Closed Without Enforcement	PEDIGO_L		Enforcement
Document Management	06/01/2023	Satisfied	PEDIGO_L		Enforcement
Letter	07/06/2022	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Site Inspection	07/06/2022	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Complaint

Complaint	07/05/2022	Inspection Required	TRETHEWEY_MB_1		Complaint
Record Document	06/02/2022	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Site Inspection	03/31/2022	Major Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Issue Document	03/31/2022	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Letter	03/31/2022	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Enforcement Referral	10/02/2020	Accepted	TRETHEWEY_MB_1		Enforcement
Phone Conversation	09/30/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Electronic Communication	09/30/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Phone Conversation	09/30/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Phone Conversation	09/30/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	05/20/2020	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Letter	05/20/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Site Inspection	05/20/2020	Major Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Record Document	12/18/2017	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Letter	05/01/2017	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	05/01/2017	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Issue Document	05/01/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Letter	06/11/2015	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	06/11/2015	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Record Document	02/19/2013	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Letter	01/30/2013	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	01/30/2013	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Non-Compliance

Site Inspection	11/02/2012	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Letter	11/02/2012	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	04/20/2012	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Letter	04/20/2012	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Record Document	12/08/2010	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Record Document	12/08/2010	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Record Document	12/08/2010	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Letter	11/24/2010	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	11/24/2010	Major Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Letter	04/20/2010	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	04/16/2010	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Letter	04/07/2009	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	04/07/2009	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Letter	05/13/2008	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	05/13/2008	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Site Inspection	04/20/2007	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Letter	04/20/2007	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Emergency Preparedness Information	02/12/2007	Satisfied	REEDER_JH_1		Routine Compliance
Emergency Preparedness Information	09/22/2006	Satisfied	REEDER_JH_1		Routine Compliance

No Open AOCs Found

No Open Violations Found

Discharge Information

Discharge Date	Clean Up Status	Score	Eligibility Info	Site Manager	Phone
02/06/2003	INACTIVE	10			
01/31/2002	COMPLETED	10			
12/12/1994	COMPLETED	10			
12/19/1988	INACTIVE	10	EARLY DETECTION INCENTIVE-ELIGIBLE		

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

May 6, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Barry Reda
HANDEX of Florida, Inc.
111 Kelsey Lane, Suite E
Tampa, FL 33619

RECEIVED
DEPARTMENT OF
ENVIRONMENTAL PROTECTION
2003 MAY 11 A 11:46
BUREAU OF PETROLEUM
STORAGE SYSTEMS
DOCUMENT MANAGEMENT
CENTER

RE: Palmetto Citgo (Former Payless 11)
203 West 10th Street
Palmetto, Manatee County, 34221
FDEP Facility ID# 418624235

Dear Mr. Reda:

On April 16, 2003, a meeting was held at the Department of Environmental Protection's (Department), Southwest District office. The meeting was requested by HANDEX to determine what assessment activities would be required by the Department for the discharge event that occurred on February 6, 2003, at the Palmetto Citgo.

The following sampling event was suggested during the meeting:

1. Collect a sample of the PCW in the vault and the groundwater from adjacent monitoring well MW-6 for analysis;
2. Collect a sample of the product in the monitoring wells having free product;
3. Measure the level of the groundwater and/or product in each monitoring well and the vault;
4. Collect a sample of the soil from the stream banks where the petroleum seep was observed by HANDEX; and,
5. If there is any sheen or product visible in the stream, collect a water sample for analysis.

Two sampling events were discussed, one prior to a rain event to establish a site "baseline" and another following a significant rain event. The Southwest District will coordinate with the Manatee County Sheriff's Department to have a representative from their Hazardous Materials Team conduct vapor level readings in the utility vault. A vapor level is necessary to determine if vapors exist in the Verizon utility box. If results shows the vapor levels to be 20% or greater than the Lower Explosive Limit (LEL), then the site score may be adjusted upward by 60 points.

At the conclusion of the meeting, the Department requested that HANDEX submit a proposal of work to be initiated at the site to determine if the "imminent threat" exists. In addition, samples need to be collected to determine whether or not the "imminent threat" is a result of the existing EDI eligible contamination or from the subsequent documented diesel releases at the facility.

The Department received HANDEX's proposal on April 23, 2003. The Department has reviewed the proposal and offers the following recommendations:

30 South Keller Road, Suite 500, Orlando, Florida 32810-6101

December 15, 2003

Michelle Nucci
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEC 16 2003

RECEIVED
DEPARTMENT OF
ENVIRONMENTAL PROTECTION
2003 DEC 16 A 11:52

BUREAU OF PETROLEUM
STORAGE SYSTEMS
DOCUMENT MANAGEMENT

Subject: General Report
Palmetto Citgo
203 10th Street West
Palmetto, Manatee County, Florida
Task Assignment No. GC574-078A
FDEP Facility No. 418624235
Earth Tech Project No. 69751

Telephone
407.331.5967
Facsimile
407.331.0025

Dear Ms. Nucci:

Earth Tech, Inc. (Earth Tech) is pleased to present this General Report for the above-referenced facility. The scope of work tasked under Task Assignment GC574-078A was designed to determine the way free product was entering a utility vault located in the right-of-way in front of the Palmetto Citgo site. The investigation was later expanded to investigate a sheen that appeared in the creek adjacent to the site after a heavy rainfall event on August 26, 2003. The investigation was performed during August and September of 2003 and consisted of the following:

- Periodic inspections of the utility vault,
- Collection of rainfall data,
- Installation and monitoring of a stream gauge,
- Collection of depth to water and free product thickness measurements,
- Installation of three temporary monitor wells, and
- Collection of soil, free product, surface water, and groundwater samples.

General Site Information

The subject site is currently occupied by the Palmetto Citgo service station. The Palmetto Citgo is a convenience store with retail fuel sales. The facility stores unleaded gasoline in three 8,000-gallon underground storage tanks (USTs), diesel fuel in one 8,000-gallon UST, and kerosene in one 4,000-gallon UST. Gasoline is dispensed at one dispenser island location, diesel fuel from two dispenser islands, and kerosene from a single dispenser. The diesel fuel UST was installed in 1978. The remaining USTs were installed in 1987. Four 4,000-gallon leaded gasoline USTs were closed in place during 1970 and a fifth 4,000-gallon leaded gasoline UST was closed in place in 1978. A site plan showing the current and former UST locations is provided as **Figure 1**.

Rainfall

Rainfall data measurements were obtained from three weather-monitoring stations in the vicinity of the site. The Sarasota/Bradenton monitoring station is located approximately 8.5 miles to the south of the site, the St. Petersburg monitoring station is located approximately 16.8 miles to the north of the site, and the Ruskin monitoring station is located approximately 15 miles to the northeast of the site. Rainfall data for August and September 2003 is provided in **Attachment C** and summarized in **Table 1**.

Stream Gauge Installation

A stream gauge was installed at the site on August 27, 2003 and the water level of the stream was recorded during each subsequent site visit. Stream elevation measurements are provided in **Table 2**.

The first attempt to install the stream gauge occurred upgradient of the petroleum seep adjacent to the 10th street bridge. Due to presence of concrete footers by the bridge and many large rocks in the streambed, the stream gauge could not be installed at that location. Test holes were advanced at multiple locations along both banks in order to find a place where the stream gauge could be installed. When post-holing occurred near the petroleum seep location, a sheen on the water became apparent. A sheen did not develop while post-holing in any other location. The stream gauge was finally installed about 100 feet downgradient of the petroleum seep.

Water Level Measurements

During the initial site visit on August 8, 2003, 3.2 feet of water was present in the on-site vault. A light sheen was observed on the water surface. The vault was pumped out and cleaned using a pressure washer and a vacuum truck provided by Clark Environmental on the morning of August 26, 2003. It rained that night and 7 inches of water were present in the vault on August 27, 2003. On September 2, 16, and 22 2003, there were 3.2, 2.95 and 2.90 feet of water in the vault, respectively. A light sheen was present on the water surface during each site visit. Each time the vault was opened, lower explosive limits (LEL) measurements were collected from the vault. No explosive vapors were detected during any of the site visits.

The vault was pumped out again on September 22, 2003. There were negligible amounts of water in the vault on September 23 and 24, 2003. On September 25, 2003 there was 1 foot of water in the vault and on September 29, 2003 there was 3.55 feet of water in the vault. A summary of the utility vault conditions and water level measurements is provided in **Table 3**.

On August 26, 2003, depth to water and top-of casing measurements were collected from all monitor wells that could be located. The groundwater elevation data indicates that groundwater flow is generally towards the northeast and the stream. Depth to water

installed to depths ranging from 5 to 10 feet below land surface (bls). No free product was observed in these wells. Temporary monitor well locations are shown on **Figure 1**. Monitor well installation diagrams and soil boring logs are provided in **Attachment E**.

Soil Quality

Utilizing a hand auger, soil samples were collected every foot during the installation of the temporary wells. Collected soil samples were screened with an organic vapor analyzer utilizing a flame ionization detector (OVA/FID). Hydrocarbon vapor concentrations greater than 500 parts per million (ppm) were detected in the soil samples collected from temporary monitor wells TW-1 at 3 feet bls and at TW-3 at 7 feet bls. The OVA analysis is summarized in **Table 5** and depicted on **Figure 3**.

On August 27, 2003, one soil sample was collected on the stream bank adjacent to the location of the petroleum seep for laboratory analysis. On September 16, 2003, two soil samples were collected during the installation of the temporary wells (TW-1 at 3 feet bls and at TW-3 at 7 feet bls) for laboratory analysis. The three soil samples were submitted to Southern Research Laboratories (SRL) for laboratory analysis by United States Environmental Protection Agency (EPA) Method 8021 for volatile organic aromatics (VOAs), EPA Method 8100 for polycyclic aromatic hydrocarbons (PAHs), and laboratory method Florida Petroleum Residual Organic (FL-PRO) for Total Recoverable Petroleum Hydrocarbons (TRPH).

The soil analytical results indicated that benzene, ethylbenzene, total xylenes, and naphthalene concentrations in the TW-3 soil sample and TRPH, pyrene, chrysene, and benzo (a) anthracene in the stream bank sample exceeded the Soil Cleanup Target Levels (SCTLs) listed in Chapter 62-777 Florida Administrative Code (FAC). The recent soil analytical results and selected historical analytical results in the area of the current investigation are summarized in **Table 6** and shown on **Figure 3**. Laboratory analytical reports are provided in **Attachment D**. Tables, figures, laboratory analytical reports, and soil boring logs from the 1994/95 Contamination Assessment Report (Growth Environmental Services, inc.) are provided in **Attachment F**.

Surface Water Quality

After a heavy rainfall event on August 26, 2003, a sheen was observed originating from the stream bank east of the free product plume on the Palmetto Citgo site. A water sample was collected from the stream at the location of the sheen and analyzed for the Kerosene Analytical Group Parameters. The surface water sample was collected directly from the water surface. A sheen was also observed in the stream on September 2, 2003. A second sample was collected from the stream on September 29, 2003 and analyzed for VOAs and PAHs by EPA Methods 8021 and 8100. There was no sheen on the water at the time of the September 29, 2003 sample collection.

Benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected in wells MW-6, MW-P, MW-R, TW-1, and TW-3 at concentrations that exceed the Groundwater Cleanup Target Levels (GCTLs) listed in Chapter 62-777. Lead was detected in monitor wells MW-6 and MW-R at concentrations that exceed GCTLs. PAHs were detected in wells TW-1, TW-3, MW-6, MW-P, and MW-R at concentrations that exceed GCTLs. FL-PRO compounds were detected in monitor wells MW-6, MW-P, and MW-R at concentrations that exceed GCTLs. Monitor well analytical data is summarized in **Table 8** and depicted on **Figures 4, 5, and 6.** Laboratory analytical reports and monitor well sampling data sheets are provided in **Attachment D.**

No FL-PRO found in groundwater samples from TW-1, TW-3

The August 2003 groundwater analytical results from monitor wells MW-6, MW-7, MW-P, and MW-R were compared to the sampling analytical data collected during 1994 and 1995. Monitor wells MW-6, MW-P, and MW-R all showed a decrease in VOA concentrations and an increase in total naphthalenes concentrations. No VOAs or PAHs have ever been detected in monitoring well MW-7.

diesel? and TRPH (refer to Table 8 and Graph Fig 12 (9/1/04) Attachment F

Summary

No measurable amount of free product was observed in the utility vault over the course of this investigation. A comparison of rainfall data and the water level measurements collected from the vault indicate that the utility vault fills with water after heavy rainfall events. The presence of sediment and dead grass in the vault indicate that the water is likely stormwater runoff. Based on the results of the PIANO analysis, the sheen on the water in the utility vault appears to be used oil, which could also be attributed to stormwater runoff. Once the on-site utility vault is full, some of the water appears to drain through the conduits into the vault located to the east of the site. **Figure 7** is a cross section showing land surface, the utility vaults, the stream, the water table surface, and the free product plume on September 29, 2003. Based on the relative elevations of the water table, utility conduits and free product plume; it is unlikely that the existing free product plume could migrate into the onsite utility vault.

After significant rain events, petroleum compounds appear to seep into the stream that runs adjacent to the site. Based on the recent stream bank soil sample and the sediment samples collected during 1995, the soils in and around the stream have been contaminated with TRPH and PAH compounds since at least 1995. There is not enough information to determine if the soil quality is improving or deteriorating. Three temporary wells were installed to determine if the free product plume intersected the adjacent stream. No free product was observed in these wells.

The analytical results from the wells with free product were compared to the results of the stream water samples and the stream bank soil sample. No conclusions could be drawn from this comparison. The petroleum compounds present in and around the stream could be the result of stormwater runoff or leaching from the free product plume. It should be noted that over the course of this investigation, no on-site stormwater runoff or evidence of on-site

Earth Tech appreciates the opportunity to assist the FDEP on this project. If you have any questions or if we can be of further service at this facility, please do not hesitate to contact me.

Very truly yours,

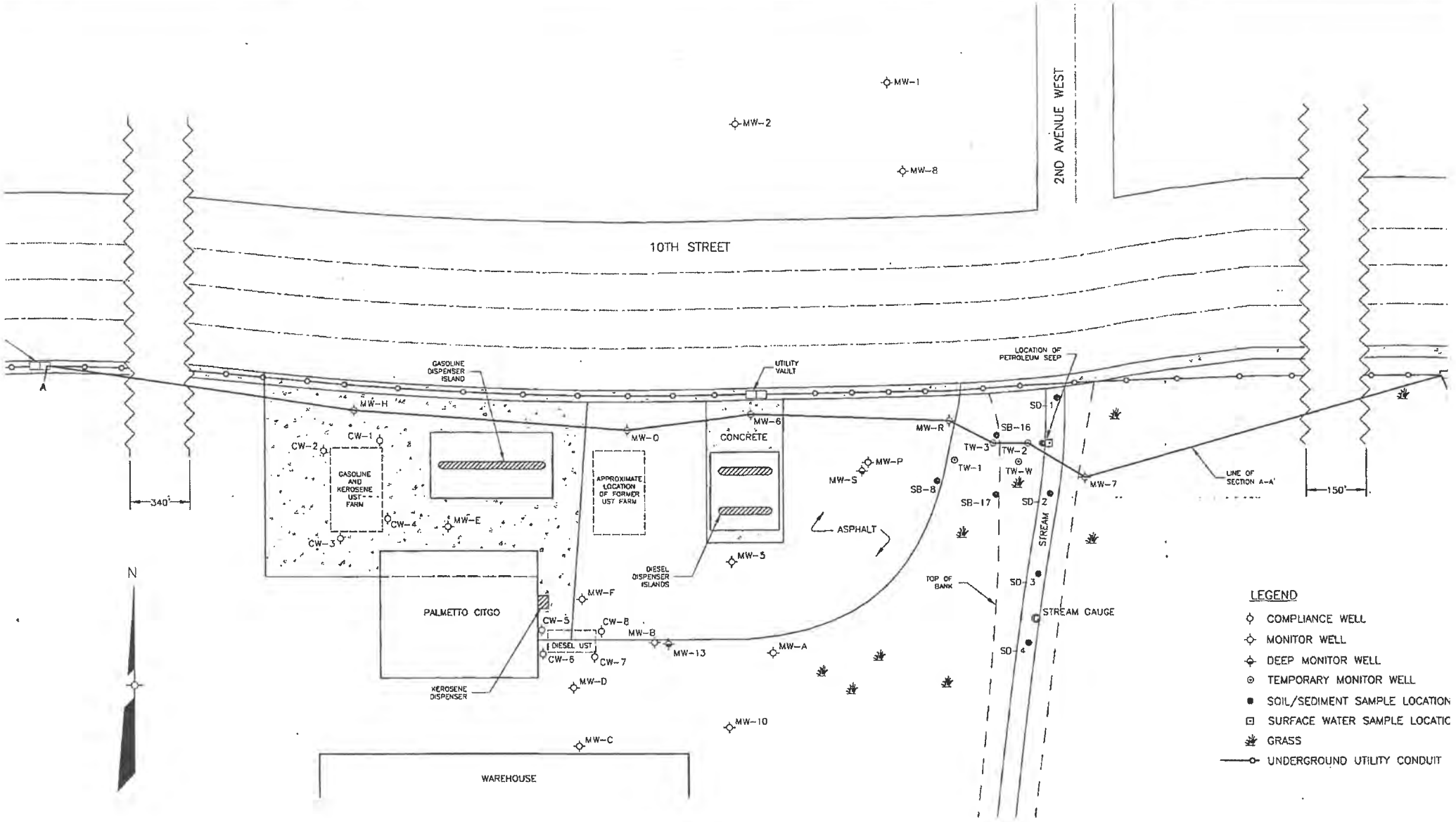
Earth Tech, Inc.

Howard Fowler, PG
Florida Registration No. 2011
Project Geologist

Suzanne Schomer, P.E.
Program Manger

Attachments

L:\WORK\69751\Deliverables\SAR\Revised Palmetto SAR 12-03.doc

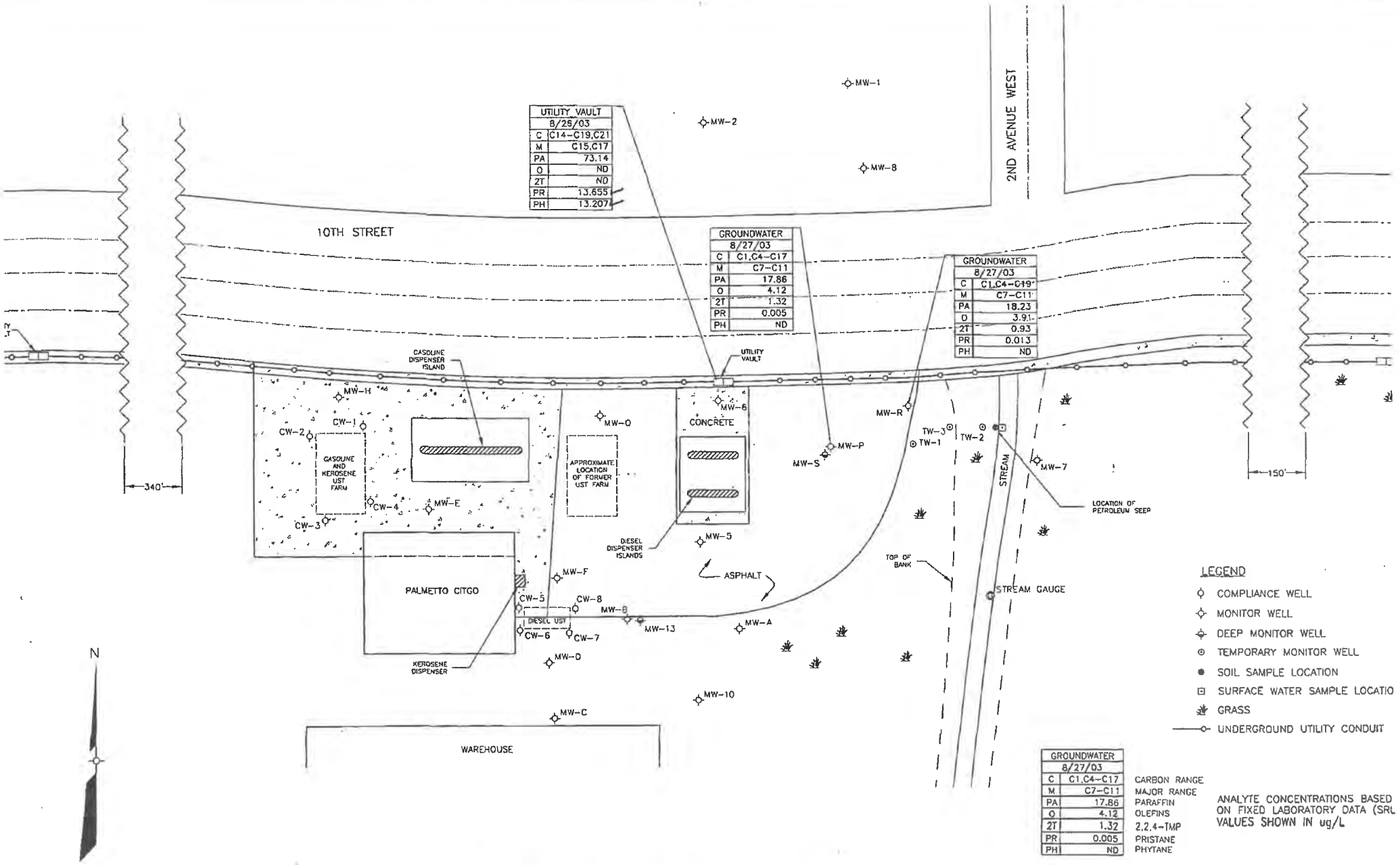


EARTH TECH

FIGURE 1
SITE MAP

PALMETTO CITGO
PALMETTO, MANATEE COUNTY, FL

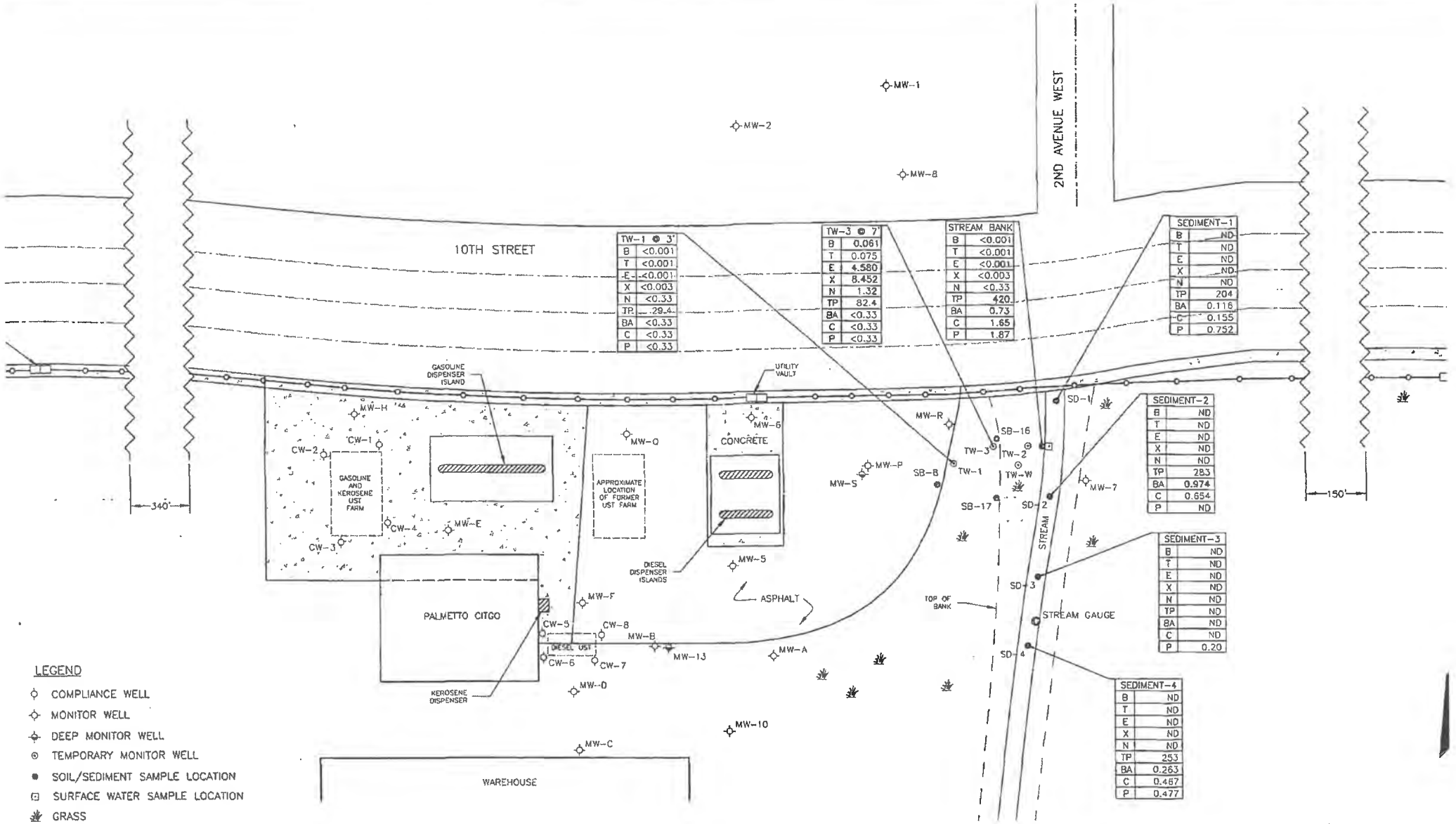
DECEMBER 2003



EARTH TECH

FIGURE 3
FREE PRODUCT SHEEN ANALYTICAL RESULTS
PALMETTO CITGO
PALMETTO, MANATEE COUNTY, FL(

DECEMBER 2003



LEGEND

- COMPLIANCE WELL
- MONITOR WELL
- DEEP MONITOR WELL
- TEMPORARY MONITOR WELL
- SOIL/SEDIMENT SAMPLE LOCATION
- SURFACE WATER SAMPLE LOCATION
- GRASS
- UNDERGROUND UTILITY CONDUIT

-1 @ 3'	SAMPLE LOCATION
<0.001	BENZENE
<0.001	TOLUENE
<0.001	ETHYL BENZENE
<0.003	TOTAL XYLENES
<0.33	NAPHTHALENE
29.4	TRPH
<0.33	BENZO (A) ANTHRACENE
<0.33	CHRYSENE
<0.33	PYRENE

CONCENTRATION (PPM)

SAMPLE DATES

9-16-03	TW-1 THROUGH TW-3
3-14-95	SD-1 THROUGH SD-4
9-06-94	SB-16 AND SB-17
9-01-94	SB-8
3-14-94	MW-R AND TW-W

0' 20' 40'

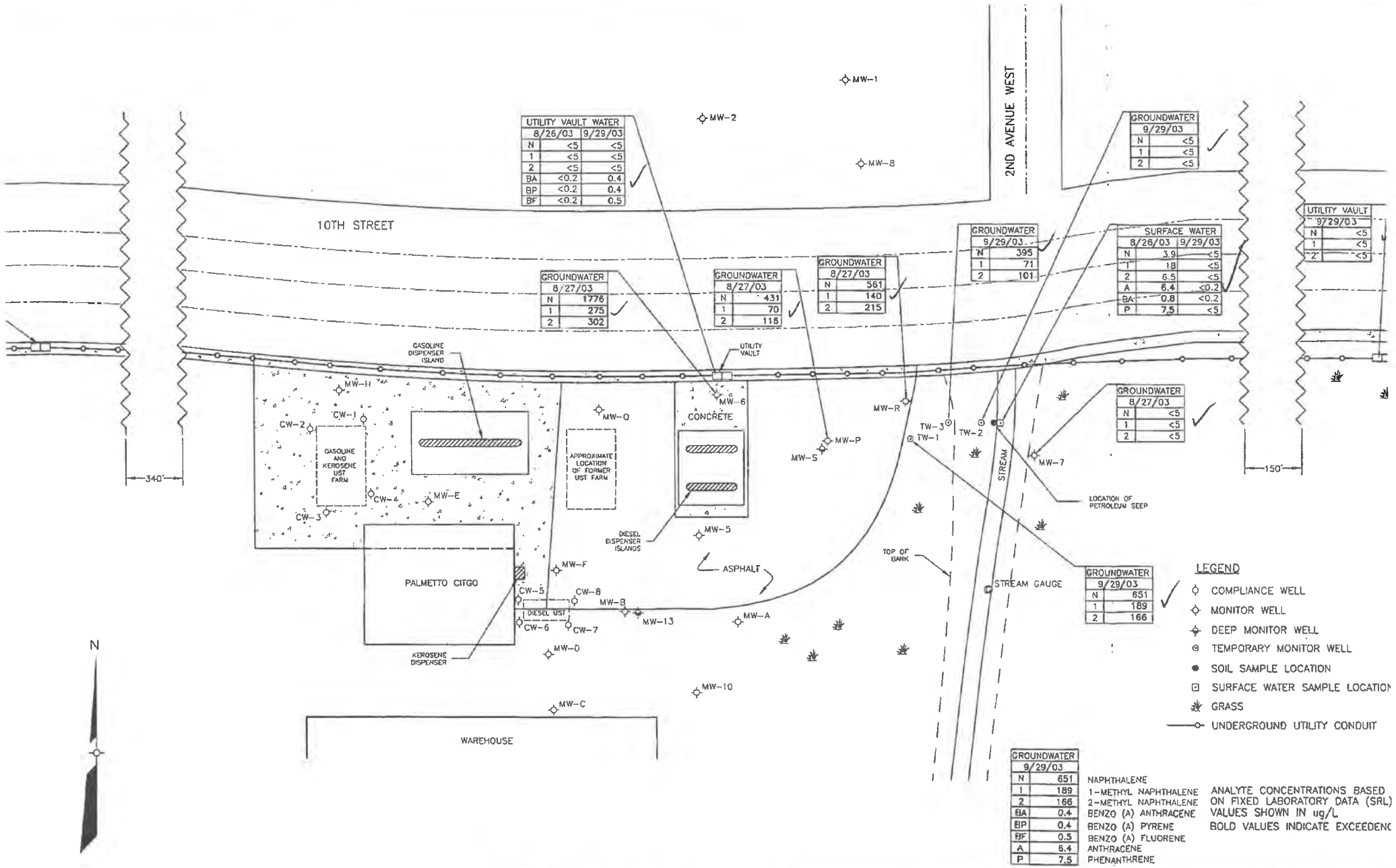
SCALE

EARTH TECH

FIGURE 5
SOIL ANALYTICAL SUMMA

PALMETTO CITGO
PALMETTO, MANATEE COUNTY, FL

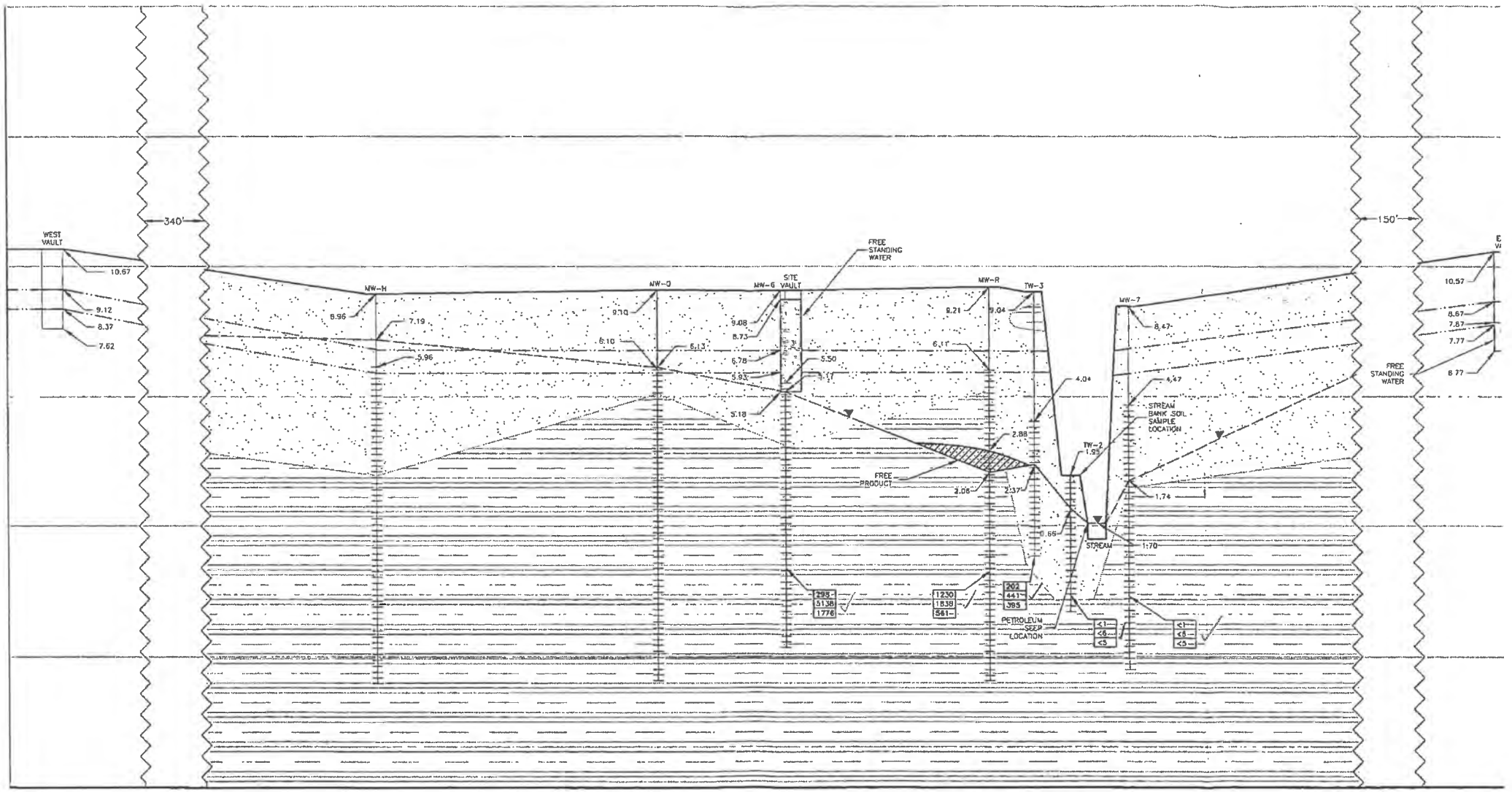
DECEMBER 2003



EARTH TECH

FIGURE 7
WATER ANALYTICAL RESUL
PAHs
PALMETTO CITGO
PALMETTO, MANATEE COUNTY, FLO

DECEMBER 2003



LEGEND

- GROUND SURFACE
- UTILITY CONDUIT
- GROUNDWATER SURFACE
- 1.74 ELEVATION

1230 BENZENE
1838 TOTAL BTEX
561 NAPHTHALENE
GROUNDWATER CONCENTRATION (ug/L)

SAND

CLAY

EARTH TECH

FIGURE 9
CROSS SECTION
SEPTEMBER 29, 2003
PALMETTO CITGO
PALMETTO, MANATEE COUNTY, FLO

DECEMBER 2003

Memorandum

Florida Department of Environmental Protection

To: Lewis J. Cornman, Jr. - Environmental Manager
Petroleum Restoration Program - Section 2

From: William Newmyer, P.G.
Ecology & Environment, Inc.
Petroleum Restoration Program - Section 6

Date: May 28, 2014

Subject: Request to Modify Discharge Records in STCM
Palmetto Citgo (former Payless No, 11)
203 10th Street West
Palmetto, Manatee County
FDEP Facility ID# 418624235
Score: 10

The referenced facility has four reported discharges, the December 19, 1988 discharge is eligible for the EDI program. A review was performed to determine the status of the discharges dated December 12, 1994, January 31, 2002 and February 6, 2003. All the referenced discharges are related to a GTE/Verizon utility/ junction box near the dispensers and overfill or alleged overfill at this diesel fuel dispensers. The February 6, 2003 Discharge Report Form also noted impact to a nearby stream.

A December 15, 2003 General Report by Earth Tech was prepared to investigate the conditions at the site including the contamination from the petroleum storage system, the contamination in the vault and the contamination in the stream. After the Department's review of the General Report, a February 13, 2004 Funding Allocation Agreement determination letter concluded that February 6, 2003 did not have a significant effect on the cleanup cost.

In consideration of the similarity of the December 12, 1994, January 31, 2002 and February 6, 2003 discharges and the conclusions of the December 15, 2003 General Report it is recommended that the December 12, 1994 and January 31, 2002 discharges be given a cleanup status of "No Cleanup Required" and the February 6, 2003 discharge should be given a cleanup program "SRFA" status and the Determination Letter should be February 13, 2004. A comment should be added " No significant impact on cleanup costs":

NREQ 5/29/14 4:25 pm

SRFA 5/29/14 4:28 pm

I have attached copies of the DRFs and other information concerning the above discharges from the site file. If you have any questions, please contact me at 877-1133, ext. 3718 or by e-mail at wnewmyer@ene.com.

Attachments: 2-13-2004 SRFA Determination
12-12-1994 Complaint Investigation Worksheet
1-31-2002 Storage Tank facility Discharge Inspection Report
2-14-2003 Cleanup Referral Memorandum on 2-6-2003 discharge.

Department of
Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

February 13, 2004

Mr. John Knightly
Automated Petroleum and Energy Company
P.O. Box 110
Brandon, Florida 33509-1110

Re: Funding Allocation Agreement
Palmetto Citgo (Former Payless No. 11)
203 10th Street
Palmetto, Florida
FDEP Facility No. 418624235

Dear Mr. Knightly,

The Florida Department of Environmental Protection Bureau of Petroleum Storage Systems has reviewed the Preapproval General Assessment Report prepared by Earth Tech and dated December 15, 2003, along with other historical assessment information in the site file in order to make a determination concerning the significance of a February 6, 2003 discharge at the facility referenced above. The referenced site has had four reported discharges, the most recent occurring on February 6, 2003. The February 6, 2003 discharge is not eligible for Inland Protection Trust Fund (IPTF) cleanup funding. A previous discharge, which occurred on December 23, 1988, is eligible for IPTF funding. The purpose of our review of assessment data for this site was to ascertain the extent and degree of contamination resulting from the February 6, 2003 non-eligible discharge and its affect on the site cleanup cost for the purpose of establishing a basis for sharing the costs of site cleanup through a Site Rehabilitation Funding Allocation (SRFA) Agreement.

The site is an active retail fuel dispensing facility and the non-eligible discharge occurred in the existing fuel dispenser area. After evaluating the limited information available which might provide an estimation of the affect of the February 6, 2003 non-eligible discharge on the extent and degree of contamination, and resulting effect on the site cleanup cost, it has not been established at this time that there has been a significant effect on the cleanup cost due to the discharge and it is not considered worth the administrative cost to enter into a SRFA Agreement to share cleanup expenses as the cleanup proceeds. This should not necessarily be considered our final determination on this matter. This is because the location of the discharge has resulted in logistical challenges with collection of the more complete site assessment information that would be necessary for us to make a more conclusive determination at this time. However,

considering what we know at this time about the amount and nature of the February 6, 2003 discharge we have determined that the likelihood of no impacts or minimal impacts on the cleanup cost is great enough that requiring you to perform LCAR assessment to verify this determination is not necessary at this time.

The record of the February 6, 2003 non-eligible discharge shall remain in the Department's petroleum cleanup tracking system but a SRFA agreement or any other contribution to the cleanup of the site related to that discharge is not necessary at this time. The Department will continue to review and evaluate supplemental assessment and remediation activities at the site as the cleanup of the eligible discharge continues and will verify this determination of no impact of the February 6, 2003 non-eligible discharge on the cleanup cost of the site. Preapproval work can continue with no contribution from the responsible party for the non-eligible discharge unless and until the Department determines that there is residual contamination from the February 6, 2003 discharge that is affecting or will affect the cost to achieve site rehabilitation completion. In the circumstance that the Department makes such a determination we may contact the responsible party for the non-eligible discharge to negotiate a SRFA agreement for the remainder of the cleanup. At that time it may or may not be necessary to suspend funded cleanup activities of the site until the SRFA agreement is in place, depending on the activities being conducted and the affect of the contamination from the non-eligible discharge on those activities. It is also possible that contamination which may be discovered in the future that resulted from the February 6, 2003 non-eligible discharge may be more appropriately cleaned up by the responsible party without a site rehabilitation funding allocation arrangement with the Department.

When site rehabilitation completion has been achieved for all contamination at the site a Site Rehabilitation Completion Order will be issued that covers all discharges, including the February 6, 2003 non-eligible discharge. If you have any questions, please contact me at (850) 488-3935.

Sincerely,

Thomas W. Conrardy

Thomas W. Conrardy, P.E.
Professional Engineer Administrator
Bureau of Petroleum Storage Systems

Cc: Leslie Pedigo, FDEP Southwest District
Michelle Nucci, BPSS, PCS5
Barry Reda , Handex of Florida, Tampa

MANATEE COUNTY ENVIRONMENTAL ACTION COMMISSION
COMPLAINT INVESTIGATION WORKSHEET

COMPLAINT RECEIVED BY: Linda Means COMPLAINT NO: EAC/HW/481/94
PROGRAM: Water Quality

DATE/TIME REPORTED: 12-12-94/8:25AM
COMPLAINANT NAME: Noel Hines
COMPLAINANT HOME PHONE: 746-1114
COMPLAINANT ADDRESS: 1320 8th Ave. E., Bradenton, FL 34208

S T R
14 34 17

* * * * * * * * * * * * * * * * * * *

PERSON/PLACE/BUSINESS OF COMPLAINT: Citgo Station/Payless # 11
(Facility #418624235)

COMPLAINT ADDRESS: 203 10th St. W.
Palmetto, FL

COMPLAINT DESCRIPTION:

Conversation with Noel Hines, GTE. SWS Environmental First Response was contracted by G.T.E. last Friday to clean out the ditch. Their Operations Manager, John Rider, can be reached at 813/546-6193 (or 800-881-8369).

(11:00AM) Conversation with John Rider, SWS. They pumped out several hundred gallons of diesel contaminated water from a 4' by 8' GTE wiring vault. The vault is located down gradient of the diesel fueling pad. Mr. Rider is confident that this was not due to one incident, but rather a result of the chronic spillage that occurs during the fueling operation of saddle tanks. Drivers typically rig the dispenser valve to stay open while they buy drinks, use the restroom, etc. He stressed that there still exists an estimated 3 drums of contaminated dirt around the vault.

* * * * * * * * * * * * * * * * * * *

DATE/TIME RECEIVED BY PROGRAM: 12/12/94
DATE/TIME OF INITIAL INVESTIGATION: 12/13/94
INVESTIGATOR'S NAME: John C. Carter

INVESTIGATOR'S FINDINGS:

12/13/94 Inspection of the site revealed that the wiring vault is on the property of Ready Food Store which is a known contaminated site in the state clean-up program. Information regarding this event has been forwarded to the clean-up agency, BWC.

RETURNED TO: Robert C. Brown
Administrator

DATE/TIME: 12/19/94 0800

DATE CLOSED :

MANATEE COUNTY ENVIRONMENTAL MANAGEMENT DEPA

STORAGE TANK FACILITY DISCHARGE INSPECTION REPORT

STCM 11095205

Access Updated JP

Reviewed

FACILITY ID#	418624235		
FACILITY NAME:	Payless #11		
FACILITY LOCATION:	203 10th St. W, Palmetto	PHONE:	813/879-8875
FACILITY CONTACT:	Ed Boyette	PHONE:	813/872-8180
OWNER:	Payless Oil Company, Inc.		
OWNER ADDRESS:	P.O. Box 151529, Tampa, FL 33684-1529		
OWNER CONTACT:	Scott Meister		
LATITUDE 273118	LONGITUDE: 823356	FAC TYPE: A	

TANK No.	SIZE	CONTENT	DATE INSTALL	UST or AST	TANK TYPE	INTEGRAL PIPING	LEAK DETECT	TANK STATUS
1	8000	D	1/1/1978	U	ABCMN	CFJK	SH24	U
7	8000	B	1/1/1987	U	AFMN	CJK	SH24	U
8	8000	B	1/1/1987	U	AFMN	CJK	SH24	U
9	8000	B	1/1/1987	U	AFMN	CI	SV24	U
10	4000	K	1/1/1987	U	AFMN	CJK	SH24	U

Inspection Type

Compliance Inspection (Annual)	TCI	____	Discharge Inspectio	TDI	✓
Compliance Inspection (DRF	TCDI	____	Installation Inspectio	TIN	____
Compliance Inspection (Complaint)	TCPI	____	Closure Inspectio	TXI	____
Compliance Re-Inspection	TCR	____			

Financial Responsibility

✓ Insurance Carrier: C+I Effective Dates: 2/12/01 - 2/12/02

____ Other Mechanism: ____

____ None

Based upon the inspection results and information provided by the owner/operator, this facility appears to meet the requirements of Florida Administrative Code 62-761. Yes ✓ No____ CWOE____

Reinspection required? Yes____ No ✓ If yes, a re-inspection will be scheduled on or after ____ days to verify correction of items noted.

Jon-Paul Pouso

Inspector Name (print)

J Paul Pouso 1-31-02

Inspector Signature / Date

mailed to Mr. Meister

Contact Name (print)

Contact Signature / Date

MANATEE COUNTY ENVIRONMENTAL MANAGEMENT DEPARTMENT

STORAGE TANK FACILITY DISCHARGE INSPECTION REPORT

Facility ID#: 418624235
Facility Name: Payless #11

Inspection date: 1-31-02

Observations:

- Compliant recieved by North River Fire Department. Met with Ron Cales (North River FD) , Scott Meister (Payless Oil Co.), and Dave Thompson (Howco Environmental). Approximately 25-35 gallons of diesel fuel was spilled onto the ground. While on site I observed a large stained area of asphalt to the east of the diesel dispensers. Other impacted areas included a Verizon utility vault and storwwater sewer. A light sheen was noted by the stormwater outfall.

- Apparently, while a customer was fueling their vehicle they overfilled their tank allowing product to spill onto the ground. The product then made its way to a Verizon utility vault and a small amount to the stormwater sewer. Most of the product was contained on the asphalt.

- Howco Environmental is handling the cleanup activities. The utility vault will be pumped out and cleaned. Sorbent pad will be placed along the stormwater outfall and will be monitored all next week. Stained asphalt / soil will be removed as neccessary. A report documenting the cleanup / sampling will be forwarded to this office.

PCT Questions:

Discharge Date: 1-31-02

Information Source: Closure, (DN) Ins., 770, ER, or other

Substance discharged: diesel

Contaminated Media: ✓ *Soil,* ____ *GW,* ____ *Surface Water,* ____ *Wells*

STCM codes that apply:

✓ *DRFR - Discharge Report Form Received* 11095206

____ *DCCR - Discharge Confirmed; 770 Cleanup Required*

✓ *DCNC - Discharge Confirmed Minor; No 770 Cleanup Required* 11095210

____ *DDCI - Discharge Discovered During Compliance/Closure Inspection*

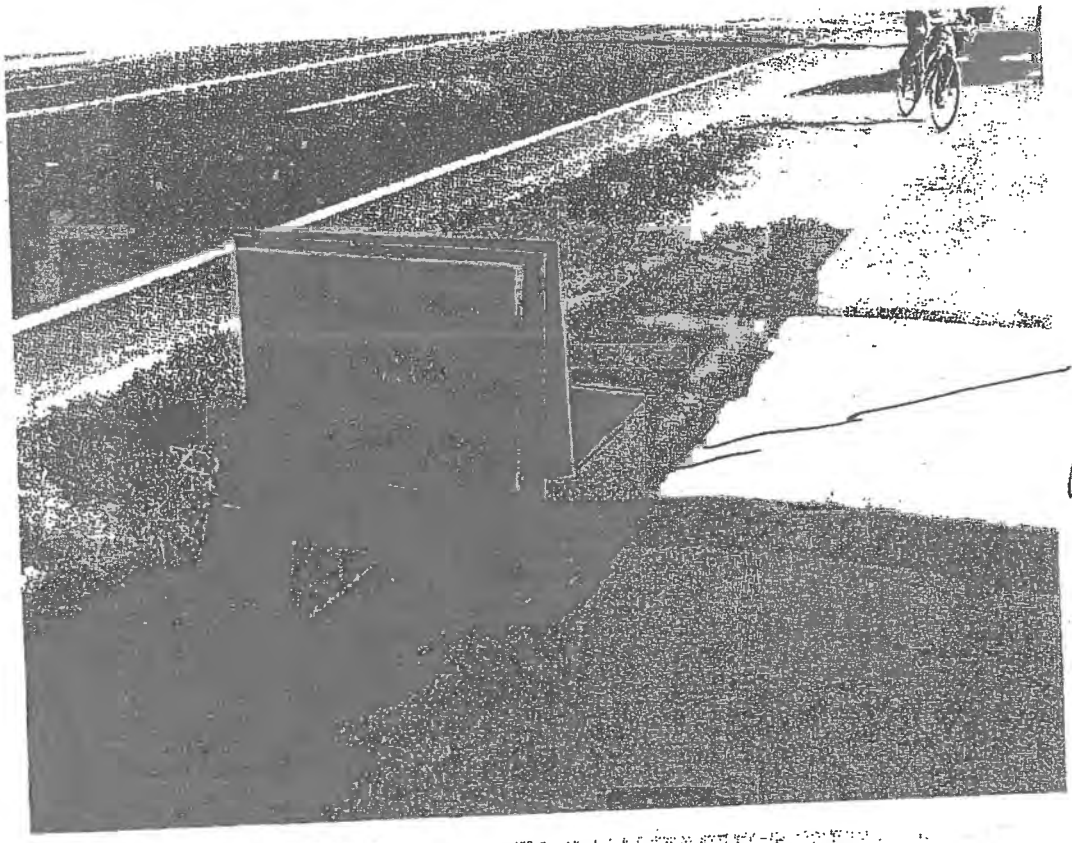
____ *DDCR - Discharge Discovered During Closure Report Review*

____ *DSNR - Discharge Suspected; No Release*

____ *DSUC - Discharge Suspected; Unconfirmed*

Recommendations / Future Requirements:

Inspectors Initials: JP



cable vault containing petroleum contact water



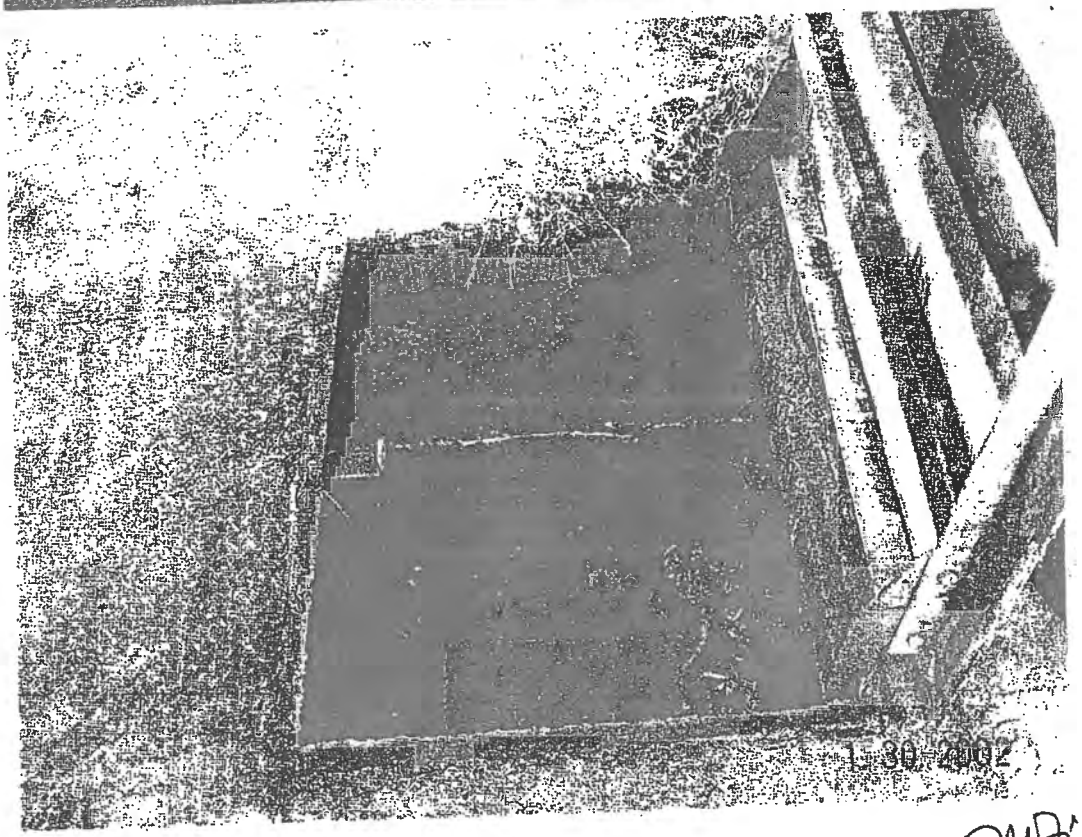
1/30/2002

Discharge Path

NDields
4186624235
Payless #11



Diesel island w/



Cable vault

M Fields
4186240235
Payless #11

April 1, 2022

Delivered via Electronic Mail

Mr. Tony Figueroa-Vivenez
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399

Re: Quarterly Natural Attenuation Monitoring Report
Citgo Palmetto
203 10th Street West
Palmetto, Manatee County, Florida
FDEP Facility No. 41/8624235
FDEP Purchase Order No. BA4782

Mr. Figueroa-Vivenez:

HSW Consulting, LLC, (HSW) has completed groundwater sampling activities at the referenced site for the Florida Department of Environmental Protection (FDEP) pursuant to the referenced purchase order. We present this Quarterly Natural Attenuation Monitoring Report (NAM) to summarize our findings as specified in the referenced FDEP Purchase Order (PO).

Site Background

The site was originally operated by the Payless Oil Company. According to available records, the site contained (13) registered underground storage tanks (USTs) varying from 4,000 to 8,000 gallons in volume, historically containing a variety of leaded and unleaded gasoline, diesel, and kerosene. The tanks were located at multiple locations on the site. According to records from the FDEP database for the facility, the tanks were removed from site in 2004. Currently, three 10,000-gallon USTs are registered for the facility, containing unleaded gasoline. A site location map is provided as **Figure 1**. A site aerial photograph is provided as **Figure 2**.

A fuel discharge was reported in 1988; the details of the discharge were not reported in the Discharge Reporting Form (DRF). In 1992, the site was granted entry into the Early Detection Incentive (EDI) program. In September 1994, liquid phase hydrocarbons were detected in MW-P and MW-2R, both wells being located near the Northwestern corner of the site. In October 1994, a Contamination Assessment Report (CAR) was submitted to the FDEP. The CAR reported "excessively contaminated soil" present at the site and various contaminant target level exceedances in the groundwater. In December 1994, a Discharge Complaint Investigation worksheet was submitted to the FDEP detailing the removal of diesel contaminated water from a GTE wiring vault. In 1995 a CAR Addendum was submitted to the FDEP. Work was suspended on the site until 2002 due to suspended program funding.

In January 2002, approximately 25 gallons of diesel fuel was reportedly discharged to the ground and entered a Verizon utility vault located north of the diesel fuel dispenser island. A DRF was submitted to the FDEP. In February 2003, diesel fuel was observed in the same Verizon utility box as described above. Additionally, in February 2003, a neighbor reported a "sheen" on a stream to the east of the subject property, which reportedly flows into the Manatee River. Due to the complaints, SWS Environmental was contracted to remove the sheen from the stream. To further prevent the sheen from entering the

Manatee River, SWS installed a boom where the stream meets the Manatee River. A Handex employee was dispatched to the site and reported a product sheen leaching into the stream from the stream bank directly adjacent to the subject property. In June 2003, the site was assigned an imminent threat status by the FDEP due to the leaching of petroleum hydrocarbons into the stream.

Between May and June 2004, source removal activities were performed on the site in accordance with a Limited Scope Remedial Action Plan prepared by Handex. Thirty-seven dewatering points and sheet pilings were installed on the property. During the source removal event, 146,000 gallons of groundwater was recovered and treated, and 3,979 tons of impacted soil was removed from the site. Between 2005 and 2006, post active remediation monitoring (PARM) was performed. Based on the data collected during PARM, the facility was removed from imminent treat status in October 2007 and work was suspended on the site until 2014 due to the low priority score of the facility.

In June 2014, a Low Score Site Initiative (LSSI) Site Assessment was completed. The report documented dissolved phase hydrocarbons were present in the northeastern portion of the property and in the former UST area located on the western portion of the property.

In July 2017, the FDEP authorized a Remedial Action Plan (RAP), the installation and operation of a remediation system, PARM, and site completion. In February 2018, the RAP was submitted to the FDEP. The RAP proposed the use of air sparging and soil vapor extraction (AS/SVE) as the remedial approach to achieve site cleanup goals. The system included 10 air sparge wells and 4 soil vapor extraction wells.

In July 2018, the AS/SVE system construction was completed. In October 2018, startup activities were initiated. Following the completion of four quarters of operation, the system was recommended by the contractor to be shut down and the site transitioned to PARM.

In April 2020, HSW received authorization to conduct verification sampling including the installation of three soil borings and groundwater sample collection from nine monitoring wells. HSW mobilized to the site on May 29, 2020, and installed VSS-1,2, and 3, collecting soil samples from the vadose zone of each boring. Groundwater samples were collected from MW-1A, MW-2A, MW-4A, MW-5A, MW-6A, MW-8A, MW-11A, MW-12A and MW-17. Both soil and groundwater samples were analyzed for BTEX/MTBE, PAHs and TRPH. Findings from the May 2020 field event are summarized in a Supplemental Site Assessment Report dated July 30, 2020.

On March 3, 2022, HSW mobilized to the site to conduct the verification event described below.

Summary of Field Activities

Groundwater Sampling

On March 3, 2022, HSW collected groundwater samples from monitoring wells MW-3A, MW-4A, MW-11A, MW-12A, and MW-17. Prior to groundwater sampling, depth-to-water was recorded at each of the monitoring wells. Groundwater sampling activities were conducted in accordance with the FDEP SOP for Groundwater Sampling (FS 2200) and approved variances. The groundwater samples were delivered to Eurofins / Test America Tampa and analyzed for the presence of Lead by EPA Method 6010D.

Field notes, equipment calibration forms, and groundwater sampling logs are provided in **Attachment A**. A Site Plan depicting the location of sampled monitoring wells is provided as **Figure 3**.

Summary of Results

Depth-to-water and corresponding groundwater elevations are summarized on **Table 1**. A groundwater elevation contour map for the March 3, 2022 is presented as **Figure 4**. The data implies the local groundwater flow is generally towards the east, which is consistent with historical data.

The groundwater analytical data is summarized on **Table 2** and depicted on **Figure 5**. Laboratory analytical results of the groundwater samples indicated the presence of Lead below the Chapter 62-777 FAC groundwater cleanup target level (GCTL) in all monitoring wells sampled. Lead was not detected in groundwater samples from monitoring wells MW-3A, MW-4A, and MW-17. The reported values for Lead in monitoring wells MW-11A and MW-12A were between the laboratory method detection limit and the laboratory practical quantitation limit. The laboratory analytical report and chain-of-custody records are provided as **Attachment B**.

All groundwater investigative derived waste (IDW) was containerized in a 55-gallon drum and stored onsite outside on pavement awaiting pickup. The drum was transported for disposal from the site on March 31, 2022. Photographic documentation of the drum and the waste disposal manifest are included in **Attachment C**.

Quality Assurance/Quality Control

The analytical data for groundwater samples were reviewed to determine the quality and usability of the data in meeting project objectives. Method QC data were examined; specifically, the results for method blanks, laboratory control samples (LCSs), and matrix spike/matrix spike duplicates (MS/MSDs). No qualifications to any of the sample results were necessary.

Conclusions

HSW completed a verification sampling event in accordance with the scope of work referenced in FDEP Purchase Order No. BA4782.

Groundwater samples collected did not exhibit results exceeding any applicable default GCTLs.

HSW appreciates the opportunity to provide these services and we look forward to the opportunity to assist you in meeting your goals for this project. If you have any questions, please feel free to contact us.

Sincerely,
HSW Consulting, LLC

Kyle M. Turner, MS, GIT
Staff Geologist II

Cheryl Nichols, PE, CHMM
Senior Engineer

PROFESSIONAL CERTIFICATION

Quarterly Natural Attenuation Monitoring Report
Citgo Palmetto
203 10th Street West
Palmetto, Manatee County, Florida
FDEP Facility No. 41/8624235
FDEP Purchase Order No. BA4782

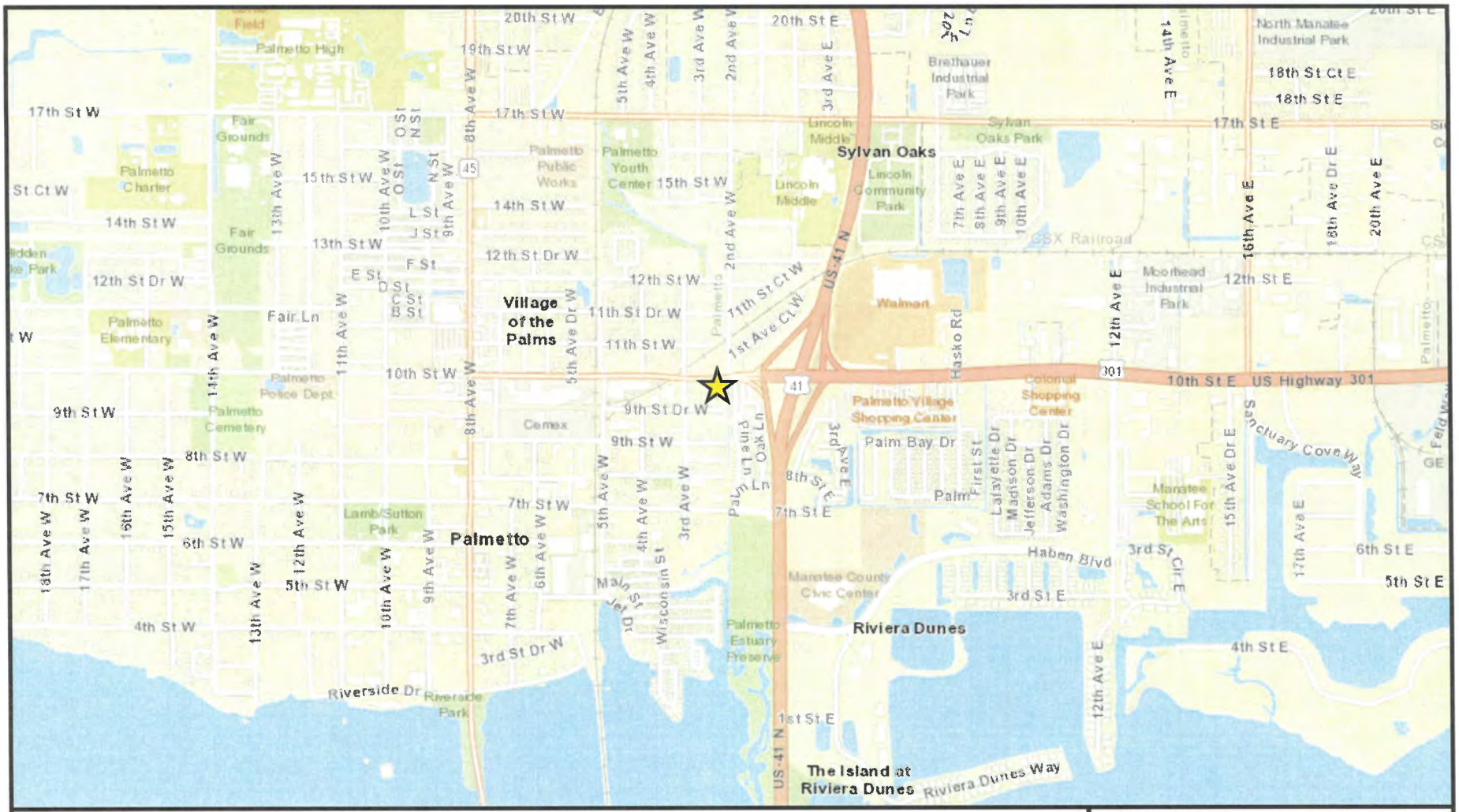
In accordance with Chapter 471, Florida Statutes, and Chapter 62-780, Florida Administrative Code, I hereby certify that this document has been prepared under the responsible charge, supervision, direction, and control of the undersigned Professional.



Digitally signed by Cheryl Nichols
Reason: This item has been digitally signed and sealed by Cheryl Nichols, PE. Printed copies of this document are not considered signed and sealed and the signature must be verified on any electronic copies.
Date: 2022.04.01 14:53:18 -04'00'

Cheryl Nichols
Florida License No. 71530

FIGURES



Citgo Palmetto
203 10th Street West
Palmetto, Florida

FIGURE 1
SITE LOCATION MAP

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S

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Feet

Legend

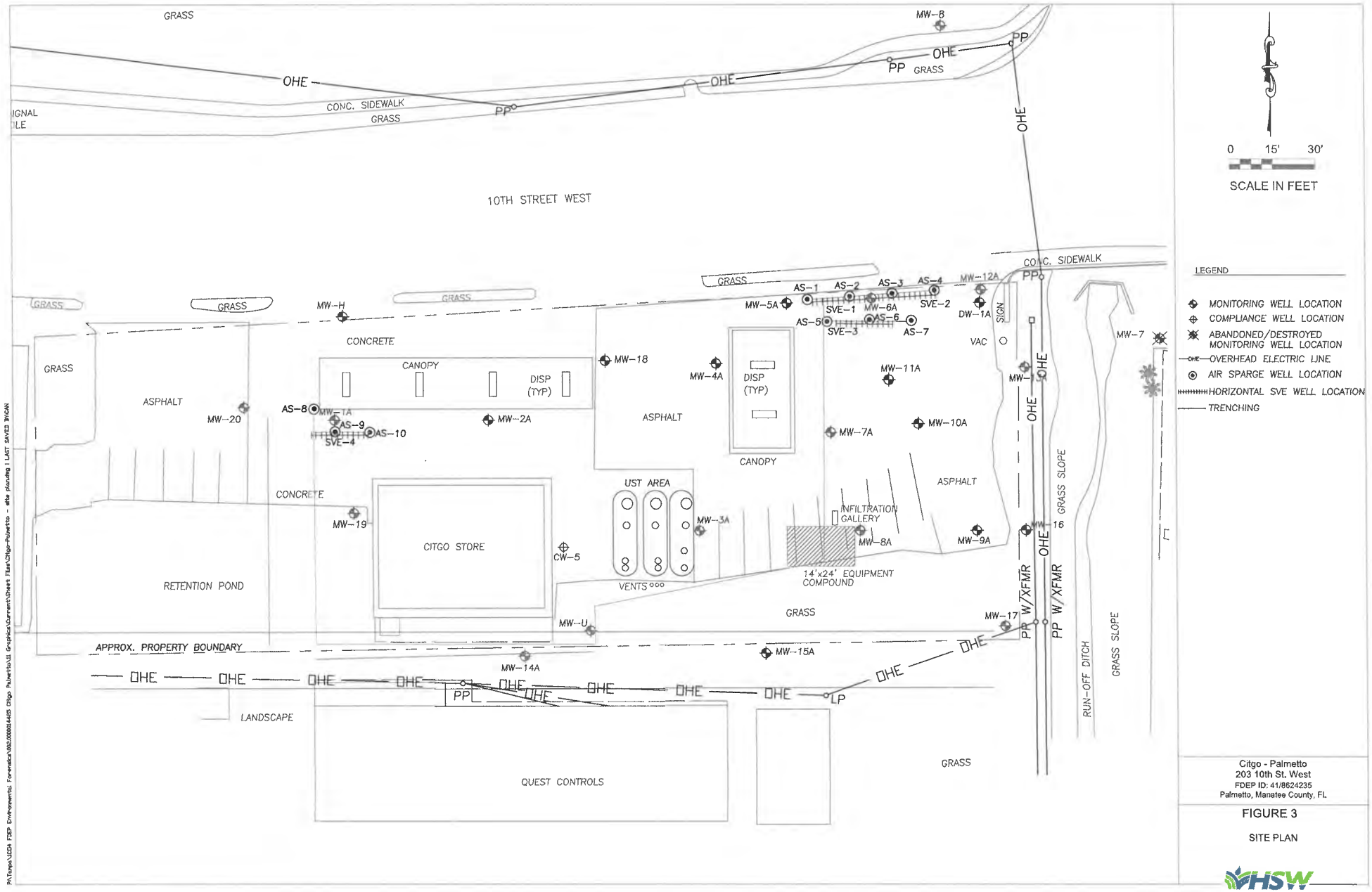
Property Boundary

Citgo Palmetto
203 10th Street West
Palmetto, Florida

Figure 2
Aerial Photograph Map

HSW

O:\Projects\1CO4\1CO402101 Citgo Palmetto\Maps\Figure 2 - Aerial Photo.mxd|User: jbolich

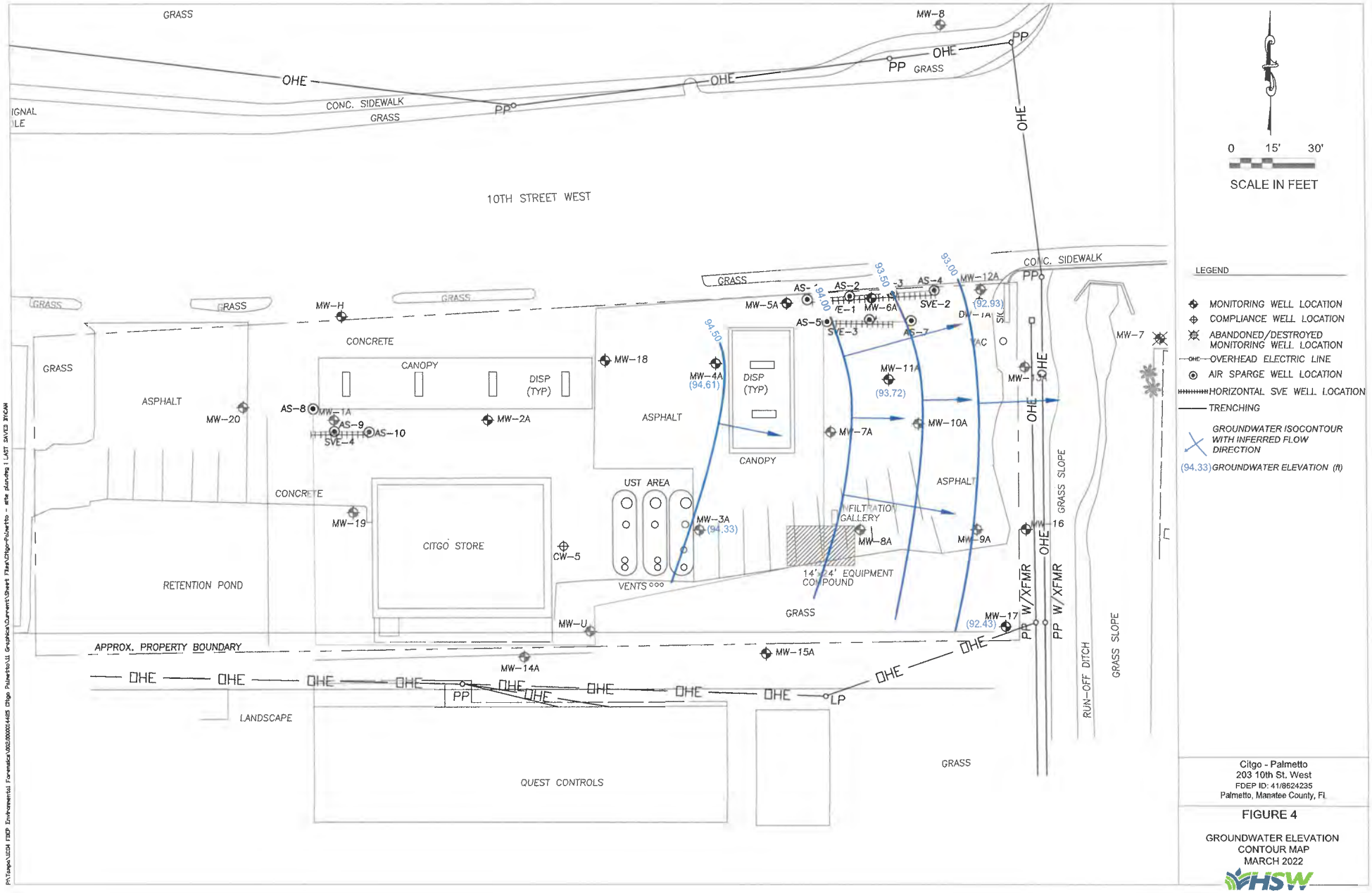


Citgo - Palmetto
203 10th St. West
FDEP ID: 41/8624235
Palmetto, Manatee County, FL

FIGURE 3

SITE PLAN

HSW

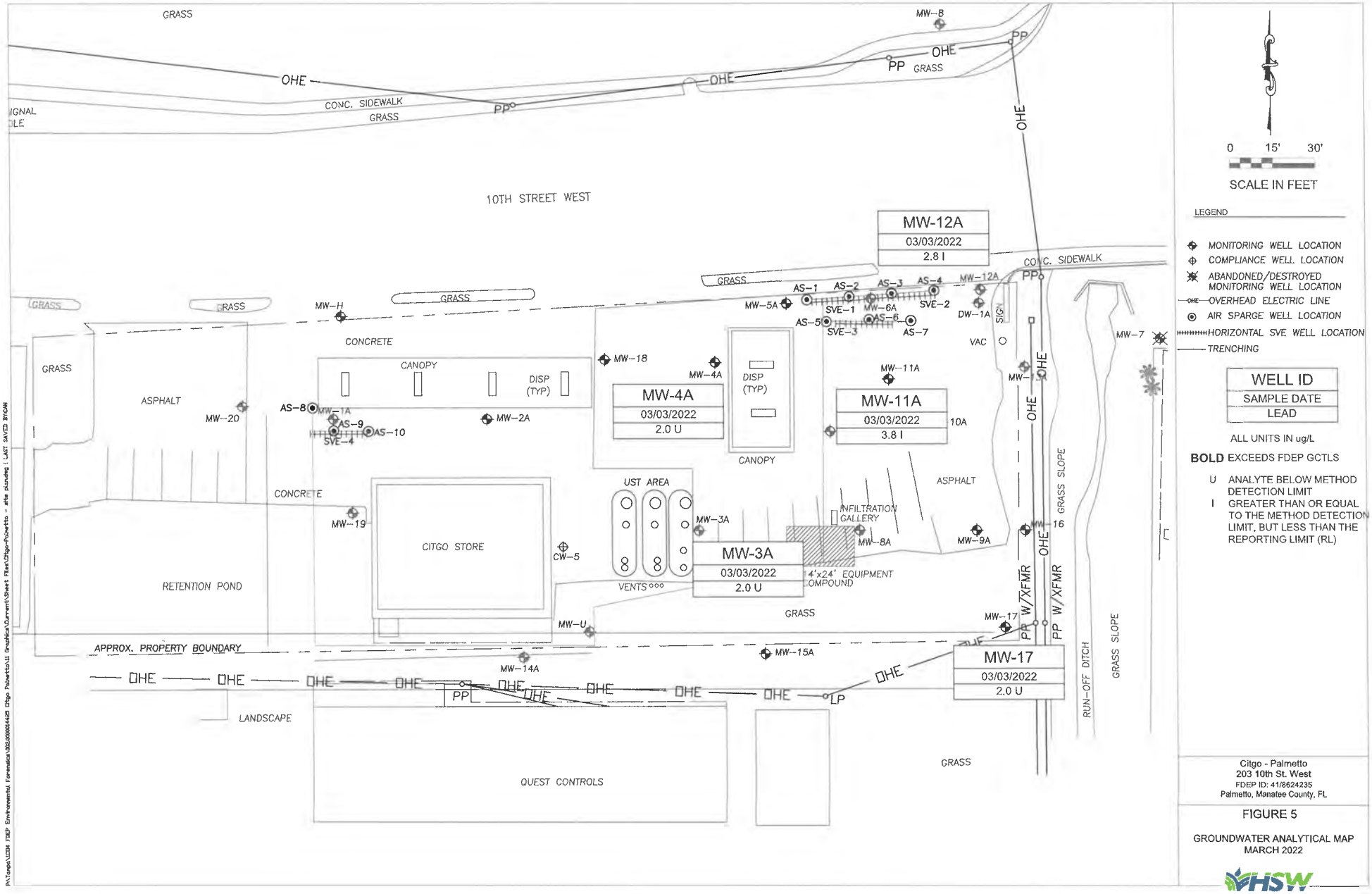


Citgo - Palmetto
203 10th St. West
FDEP ID: 41/8624235
Palmetto, Manatee County, FL

FIGURE 4

GROUNDWATER ELEVATION CONTOUR MAP
MARCH 2022

HSW



Citgo - Palmetto
203 10th St. West
FDEP ID: 41/8624235
Palmetto, Manatee County, FL

FIGURE 5

GROUNDWATER ANALYTICAL MAP
MARCH 2022

HSW

February 24, 2023

WSP USA Environment & Infrastructure, Inc.
325 John Knox Road
Building F, Suite 140
Tallahassee, Florida 32303
T: 850-656-1293

Ms. Brittany Anding
Florida Department of Environmental Protection
Environmental Forensics Site Investigation
MS 4540
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Quarterly Natural Attenuation Monitoring Report
Verification Sampling
Citgo – Palmetto
203 10th Street West
Palmetto, Manatee County, Florida
FDEP Facility ID No.: 41/8624235
Purchase Order No.: C0B73F

Dear Ms. Anding:

WSP USA Environment & Infrastructure, Inc., (WSP) is pleased to submit to the Florida Department of Environmental Protection (FDEP) this Quarterly Natural Attenuation Monitoring (NAM) Report for the Citgo – Palmetto site located in Palmetto, Manatee County, Florida (Figure 1). This report summarizes the groundwater sampling verification activities conducted at the site under Task 2 of Purchase Order #C0V73F.

Tables included in the report are: Table 1: Soil Screening Summary, Table 2 – Soil Analytical Summary, Table 3 – Groundwater Elevation Summary and Table 4 – Groundwater Analytical Summary. Figures included in this report are: Figure 1 – Site Vicinity Map, Figure 2 – Site Plan with Sample Locations, Figure 3 – Organic Vapor Analyzer (OVA) Results, Figure 4 – Soil Analytical Summary, Figure 5 – Depth to Groundwater Map (January 31, 2023) and Figure 6 – Groundwater Analytical Summary.

Soil boring logs, well construction logs, groundwater sampling logs and calibration logs are included as Attachment A, the laboratory analytical report is included as Attachment B, field notes are included as Attachment C and the Schedule of Pay Items (SPI) Invoice Rate Sheet is included as Attachment D.

Site History and Background

According to available records, the site contained 13 registered underground storage tanks (USTs) varying from 4,000 to 8,000 gallons in volume, historically containing a variety of leaded

and unleaded gasoline, diesel, and kerosene. The tanks were located at multiple locations on the site. According to records from the FDEP database for the facility, the tanks were removed from site in 2004. Currently, three 10,000-gallon USTs are registered for the facility, containing unleaded gasoline. In 1988, a Discharge Reporting Form was submitted, and the site was entered into the Early Detection Incentive (EDI) program in 1992.

FIELD WORK

Proposed Activities

The activities proposed to be completed under Task 2 of the current PO are the following:

- Advance one soil boring to 3 feet below land surface (bls) and screen soil samples with an organic vapor analyzer (OVA).
- Advance one soil boring during well installation to 32 feet bls and screen soil samples with an OVA.
- Collect one soil sample and analyze for benzene, toluene, ethylbenzene, total xylenes (BTEX) and methyl tert-butyl ether (MTBE).
- Collect one investigation derived waste (IDW) soil sample and analyze for BTEX and MTBE, priority pollutant volatile organics (VOCPP), volatile organic hydrocarbons (VOHs), total recoverable petroleum hydrocarbons (TRPHs), RCRA 4 Metals and the Toxicity Characteristic Leaching Procedure (TCLP)for Lead.
- Install one monitoring well (MW-13R) to 32 feet bls with 5 feet of 0.010-inch slot screen.
- Collect a groundwater sample from one monitoring well (MW-13R) for laboratory analysis for BTEX and MTBE.

Completed Activities

The activities completed under Task 2 of the current PO are the following:

- Advanced one soil boring to 3 feet bls and screen soil samples with an OVA.
- Advanced one soil boring during well installation to 32 feet bls and screen soil samples with an OVA.
- Collected one soil sample and analyze for BTEX and MTBE.
- Collected one IDW soil sample and analyze for BTEX and MTBE, VOCPP, VOHs, TRPHs, RCRA 4 Metals and TCLP for Lead.
- Installed one monitoring well (MW-13R) to 32 feet bls with 5 feet of 0.010-inch slot screen.
- Collected a groundwater sample from one monitoring well (MW-13R) for laboratory analysis for BTEX and MTBE.

Soil Screening Summary

Prior to advancing the soil borings, WSP contacted Sunshine One Call to have the underground utilities marked in the vicinity of the proposed study area.

On January 11, 2023, WSP completed one soil boring to 3 feet bls (VSS-MW-18-3) and one soil boring (MW-13R) to 32 feet bls at the site. The soil samples at VSS-MW-18-3 were collected using a hand auger. The soil samples at MW-13R were collected using split-spoon samplers during the monitoring well installation of MW-13R. The soil samples were screened with an OVA that used a flame ionization detector (FID). The soil boring logs are included in Attachment A.

One verification soil sample was collected for laboratory analysis from VSS-MW-18-3 at 3 feet bls and was analyzed for BTEX and MTBE using United States Environmental Protection Agency (USEPA) Method 8260B. The soil samples were placed in a cooler with wet ice and sent under standard chain-of-custody protocol to Advanced Environmental Laboratories, Inc., for analysis.

Soil Analytical Summary

One verification soil sample was collected for laboratory analysis to assess the presence of petroleum contaminants.

Soil samples were collected for laboratory analysis from soil boring VSS-MW-18-3 (2-3 feet bls; OVA – 0 parts per million [ppm]).

The soil sample results were compared to the Soil Cleanup Target levels (SCTLs) per Chapter 62-777, Florida Administrative Code (FAC). According to the laboratory analytical report from the January 2023 sampling event, petroleum-related constituents of concern were detected at concentrations below the SCTLs in the soil sample collected.

The soil analytical data is detailed in Table 2 and on Figure 4. The laboratory analytical data is presented in Attachment B.

Monitoring Well Installation

On January 11, 2023, one monitoring well (MW-13R) was installed using hollow stem augers (HSAs). The monitoring well was constructed to a total depth of 32 feet bls with 5 feet of 0.010-inch slot screen of 2-inch diameter PVC. A 20/30-grade sand pack was installed to 2 feet above the top of the screen and a 2-foot, 30/65-grade fine sand seal was installed on top of that followed by grout to land surface. The monitoring well was secured inside an 8-inch diameter bolt down well vault embedded in a flush mounted 2-foot by 2-foot concrete pad. WSP developed the newly installed monitoring using a submersible pump well prior to sampling the well. The monitoring well construction log is presented in Attachment A.

The soils derived from drilling activities were containerized in three, 55-gallon drums for disposal during the January 2023 well installation event. The drum is scheduled to be picked up and disposed of the week of February 28, 2023 by RNA Consulting Group, LLC. The disposal manifest will be provided once the pickup occurs.

One soil sample was collected from the drum containing IDW and analyzed for BTEX, MTBE, VOCPP and VOHs using USEPA Method 8260B, TRPHs, RCRA 4 Metals using USPEA Method 6010B and TCLP lead using USEPA Method 1311 (soil disposal requirements).

Water Level Measurement Results

On January 31, 2023, a depth to groundwater measurement was collected from monitoring well MW-13R. The depth to water was 6.61 feet below top of casing (btoc). There are not enough data points available to determine the groundwater flow. The groundwater elevation data is presented in Table 1 and on Figure 5.

Groundwater Sampling

On January 31, 2023, a groundwater sample was collected from monitoring well MW-13R. In accordance with the FDEP approved purchase order, the groundwater sample was analyzed for BTEX and MTBE using USEPA Method 8260B. The groundwater sample was collected using low-flow purging and sampling techniques per the FDEP's Groundwater Sampling Standard Operating Procedures (SOPs). The groundwater sample was placed in a cooler with wet ice and sent under standard chain-of-custody protocol to Advanced Environmental Laboratories, Inc., (AEL), for analysis.

Groundwater Analytical Results

Laboratory analytical results from the January 2023 sampling event reported petroleum-related constituents of concentration below the GCTLs as defined in Table I of Chapter 62-777, FAC in the groundwater sample collected from monitoring well MW-13R.

The groundwater sampling and calibration logs are included in Attachment A. The laboratory analytical data is included in Attachment B. The groundwater analytical data is presented in Table 2 and on Figure 6.

Conclusion

Based on the laboratory analytical data, petroleum-related constituents of concern were detected at concentrations below the SCTLs in the soil sample collected from VSS-MW-18-3, and petroleum-related constituents of concern were detected at concentrations below the GCTLs in the groundwater sample collected from MW-13R.

If you have any questions concerning this report, please contact either of the undersigned at (850) 656-1293.

Sincerely,

WSP USA
Environment and Infrastructure, Inc.

Alexandra Horne
Project Manager

Ron White, P.G.
Associate Scientist

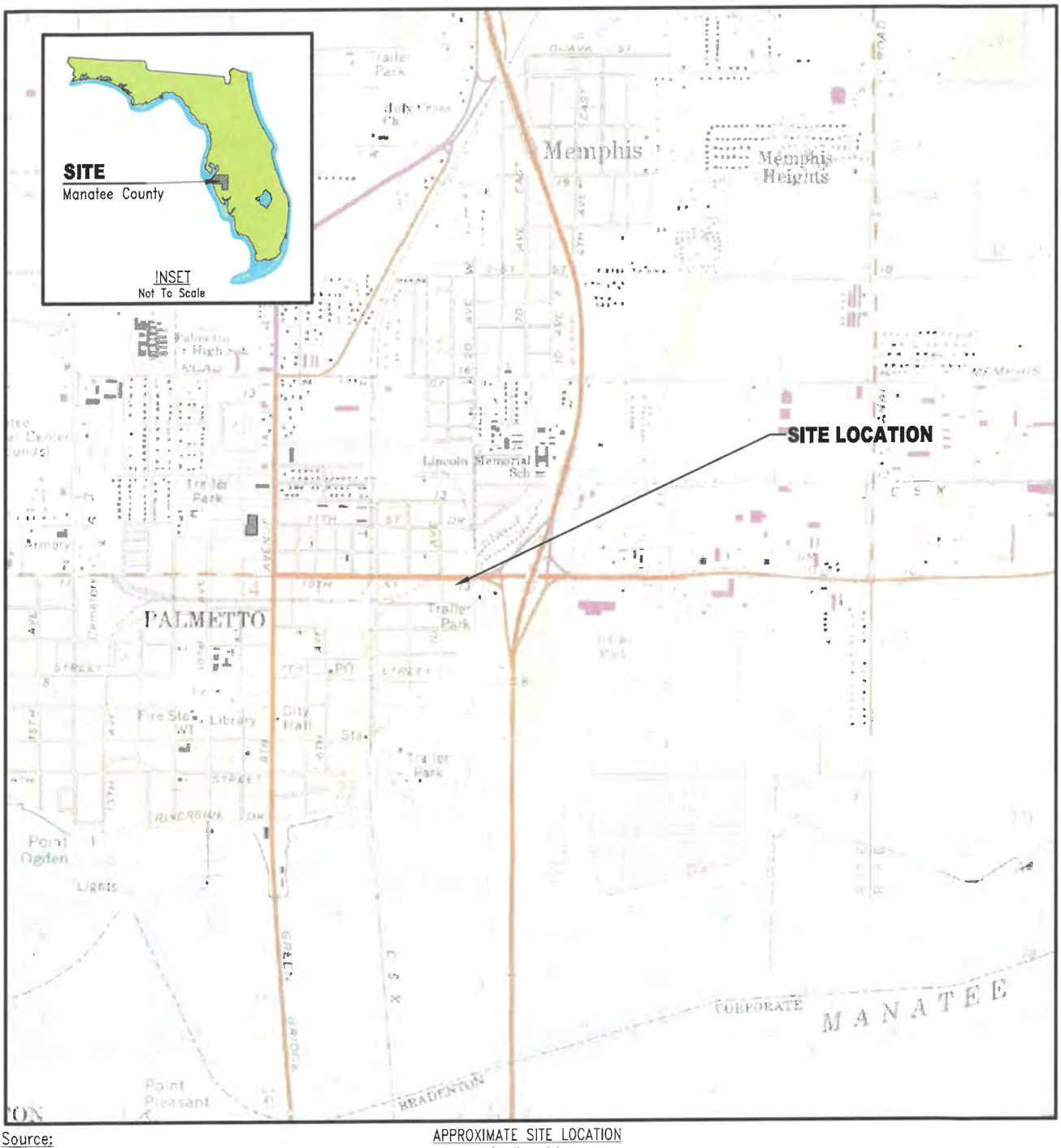
PROFESSIONAL REVIEW CERTIFICATION

The work described in this Quarterly Natural Attenuation Monitoring Report for the Citgo – Palmetto, located in Palmetto, Manatee County, Florida, was performed in accordance with commonly accepted procedures consistent with the applied standards of practice under the direction of the undersigned professional geologist. The professional opinions rendered are based on the associated information detailed in the text and appended to this report or referenced in public literature. Recommendations are based upon interpretations of the applicable regulatory requirements, guidelines, and relevant issues discussed with regulatory personnel. If conditions that differ from those described are determined to exist, the undersigned should be notified to evaluate the effects of any additional information on the assessment or recommendations made in this report. These field activities were conducted at the Citgo – Palmetto, located in Palmetto, Manatee County, Florida, in accordance with Florida Department of Environmental Protection directives and U.S. Environmental Protection Agency protocol, and the report should not be construed to apply for any other purpose or to any other site.

WSP USA Environment & Infrastructure, Inc., **(P.G. License Number: PG1270)** is authorized under the provisions of Section 492 Florida Statutes.



This document has been electronically signed and sealed by Ronald D. White, P.G., on **February 24, 2023** using a SHA-1 authentication code. Printed copies of this document are not considered signed and sealed and the SHA-1 authentication code must be verified on any electronic copies.



Source:
USGS Quadrangle
PALMETTO, FLA 1964,
Photorevised 1987
Copyright 2013 Maptech

APPROXIMATE SITE LOCATION
Section 14,
Township 34 South, Range 17 East
Latitude: 27° 31' 15.40" North
Longitude: 82° 33' 55.00" West

0 1,000 2,000
SCALE: 1 INCH = 2,000 FEET

Facility ID#: 41/8624235

PLOTTED: February 23, 2023 – 2:09 PM, BY: Burton, George A

SITE VICINITY MAP

NO.	DATE	REVISIONS
0	Feb-23	Initial Submittal

DESIGNED	DRAWN	CHECKED	DATE
AH	GB		

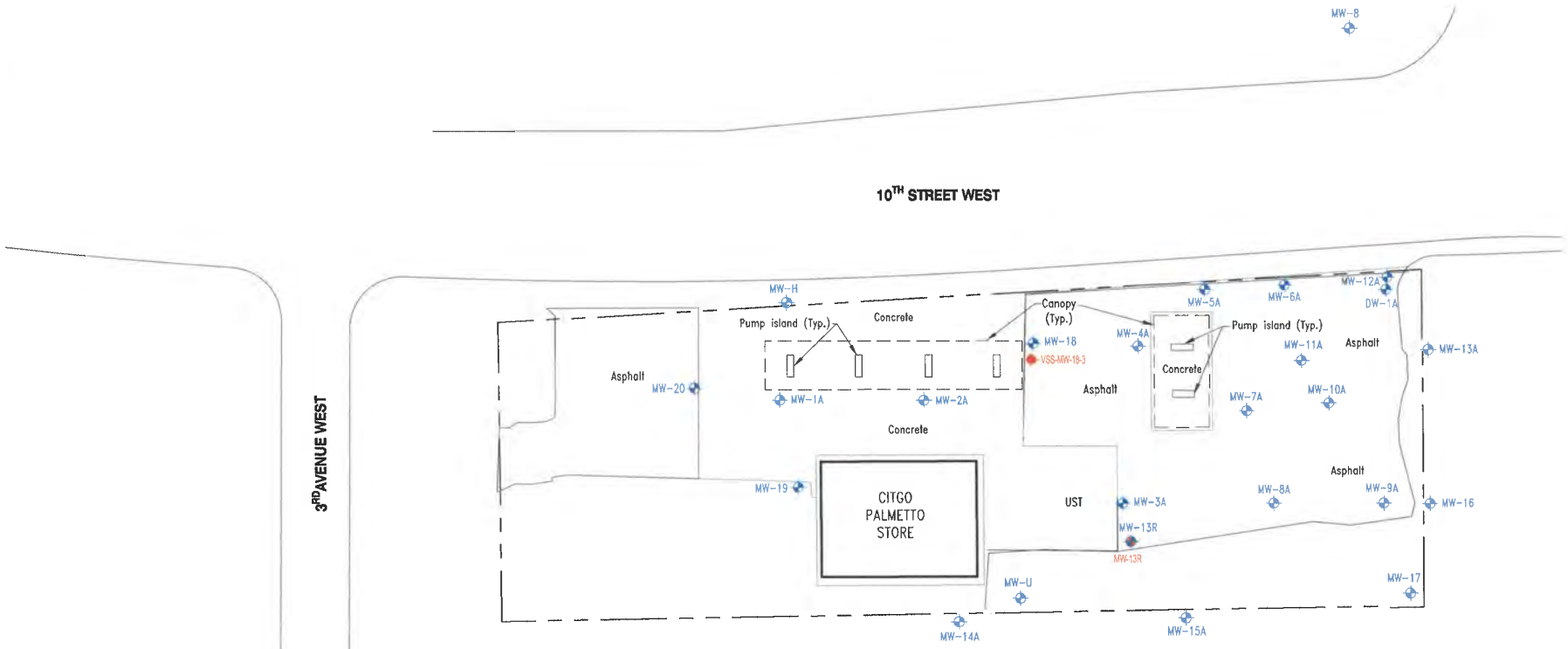
P:\CAD\CC905\Forensics\Citgo Palmetto\2023-02\FIG-1.dwg

WSP USA Environment & Infrastructure, Inc.
Tallahassee, Florida

CITGO PALMETTO
VERIFICATION SAMPLING REPORT
203 10TH STREET WEST
PALMETTO, MANATEE COUNTY, FLORIDA

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FIGURE: 1



LEGEND

MW-15	Monitoring well location and designation
VSS-MW-18-3	Soil boring location and designation
----	Approximate parcel boundary
UST	Underground storage tank

Facility ID#: 41/8624235

0 20 40

SCALE: 1 INCH = 40 FEET

N

SITE MAP WITH SAMPLE LOCATIONS

NO.	DATE	REVISIONS
0	Feb-23	Initial Submittal

DESIGNED	DRAWN	CHECKED	DATE
AH	GB		

P:\CAD\CITGO\Tampa\Citgo Palmetto\2023-02\FIG-3.dwg

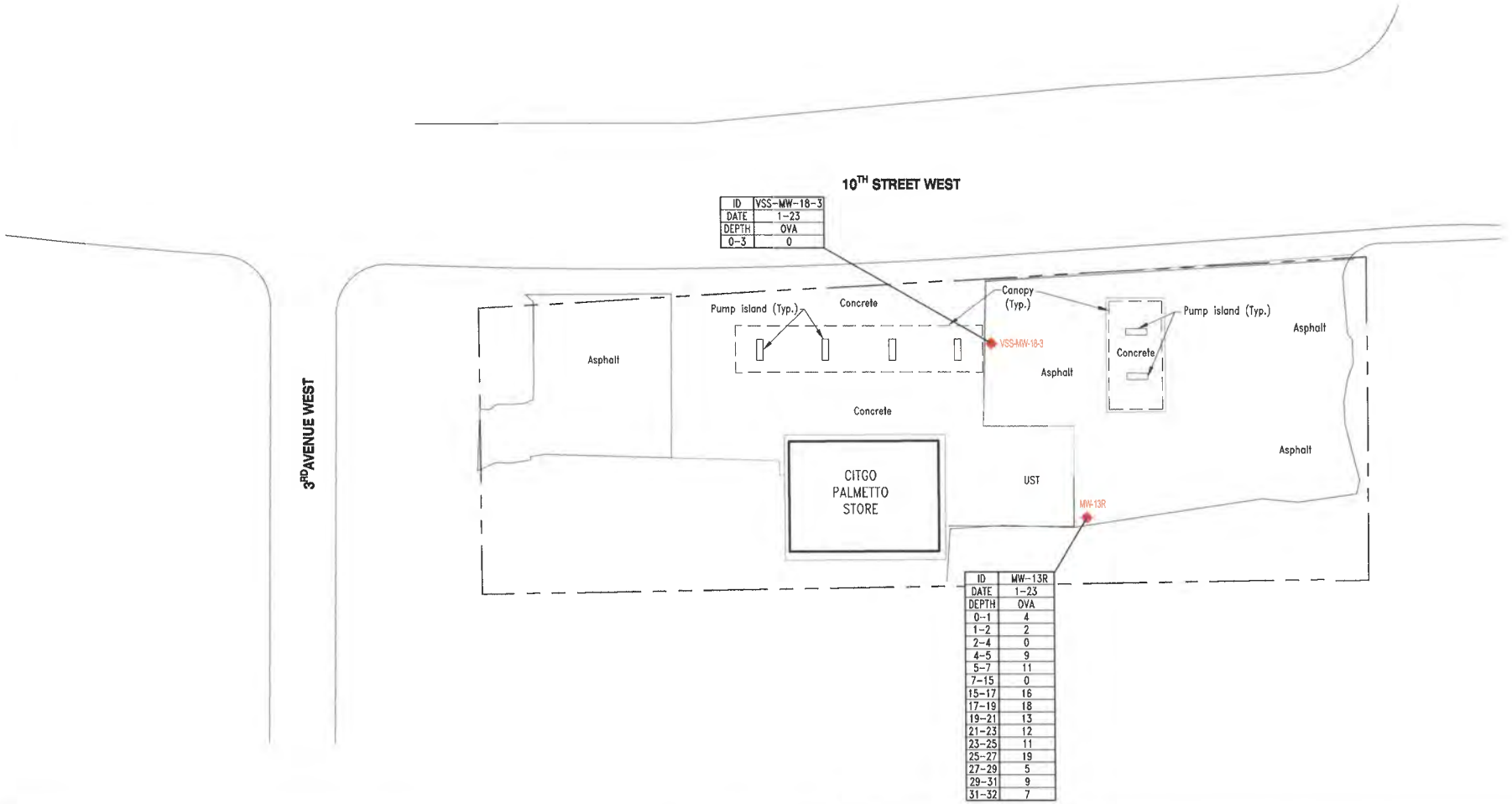
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WSP USA Environment & Infrastructure, Inc.
Tallahassee, Florida

CITGO PALMETTO
VERIFICATION SAMPLING REPORT
203 10TH STREET WEST
PALMETTO, MANATEE COUNTY, FLORIDA

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FIGURE: 2



ORGANIC VAPOR ANALYZER (OVA) RESULTS

LEGEND
- VSS-MW-18-3 — Soil boring location and designation
- Approximate property boundary
- UST — Underground storage tank
- >10 — OVA concentration contour and value

NOTES:
1. Concentrations in parts per million (ppm).

Facility ID#: 41/8624235

0 20 40
SCALE: 1 INCH = 40 FEET

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NO.	DATE	REVISIONS
0	Feb-23	Initial Submittal

DESIGNED: AH | DRAWN: GB | CHECKED: | DATE:

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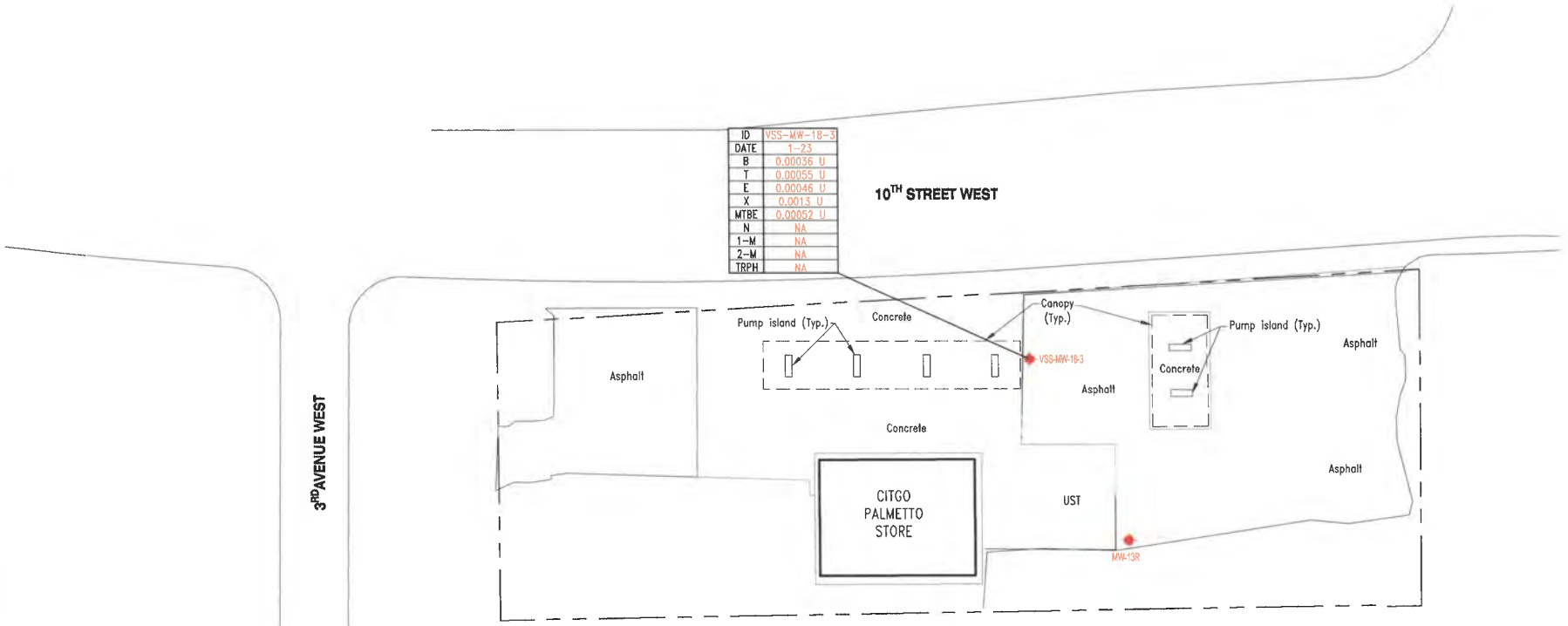
WSP USA Environment & Infrastructure, Inc.
Tallahassee, Florida

CITGO PALMETTO
VERIFICATION SAMPLING REPORT
203 10TH STREET WEST
PALMETTO, MANATEE COUNTY, FLORIDA

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FIGURE: 3

PLOTTED: February 23, 2023 – 1:31 PM, BY: Burton, George A



LEGEND

VSS-MW-18-3	Soil boring location and designation
	Approximate property boundary
UST	Underground storage tank
	Soil concentration contour above SCTL
B	Benzene
T	Toluene
E	Ethylbenzene
X	Total Xylenes
MTBE	Methyl Tert-Butyl Ether
N	Naphthalene
1-M	1-Methylnaphthalene
2-M	2-Methylnaphthalene
TRPH	Total Recoverable Petroleum Hydrocarbons
U	Analyte, if present, was at a concentration below its method detection limit
I	The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit

NOTES:

1. Concentrations in milligrams per kilogram.
2. Bolded concentrations exceed Soil Cleanup Target Levels (SCTL).
3. Concentrations in red represent most current data.

Facility ID#: 41/8624235

0 20 40

SCALE: 1 INCH = 40 FEET

N

SOIL ANALYTICAL SUMMARY

NO.	DATE	REVISIONS
0	Feb-23	Initial Submitted

DESIGNED AH | DRAWN GB | CHECKED | DATE

P:\CAD\CCR01\Tallahassee\Citgo Palmetto\2023-02\FIG-4.dwg

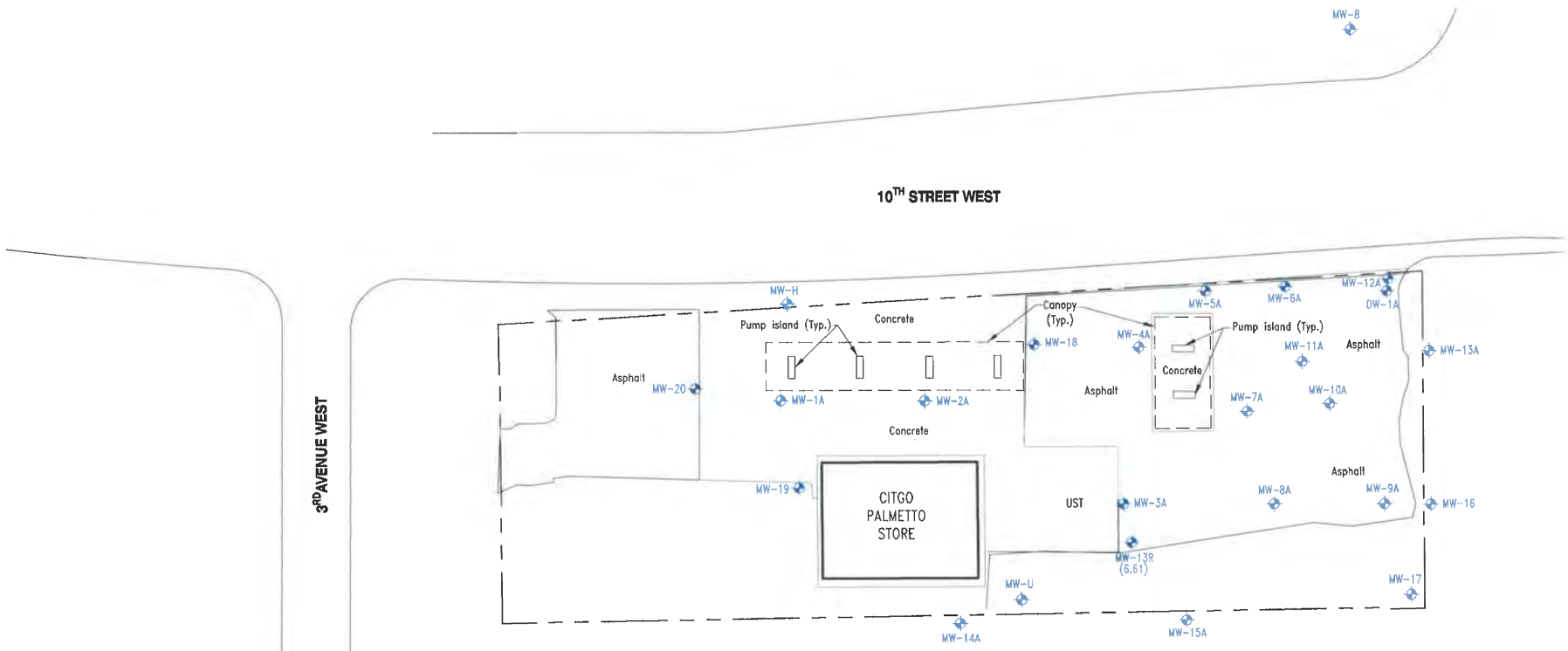
PLOTTED: February 23, 2023 - 1:36 PM, BY: Burton, George A

WSP USA Environment & Infrastructure, Inc.
Tallahassee, Florida

CITGO PALMETTO
VERIFICATION SAMPLING REPORT
203 10TH STREET WEST
PALMETTO, MANATEE COUNTY, FLORIDA

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FIGURE: 4



LEGEND

MW-13R	Monitoring well location and designation
	Approximate property boundary
UST	Underground storage tank
(6.61)	Groundwater elevation

Facility ID#: 41/8624235

0 20 40

SCALE: 1 INCH = 40 FEET

N

DEPTH TO GROUNDWATER MAP
JANUARY 31, 2023

NO.	DATE	REVISIONS
0	Feb-23	Initial Submittal

DESIGNED AH | DRAWN GB | CHECKED | DATE

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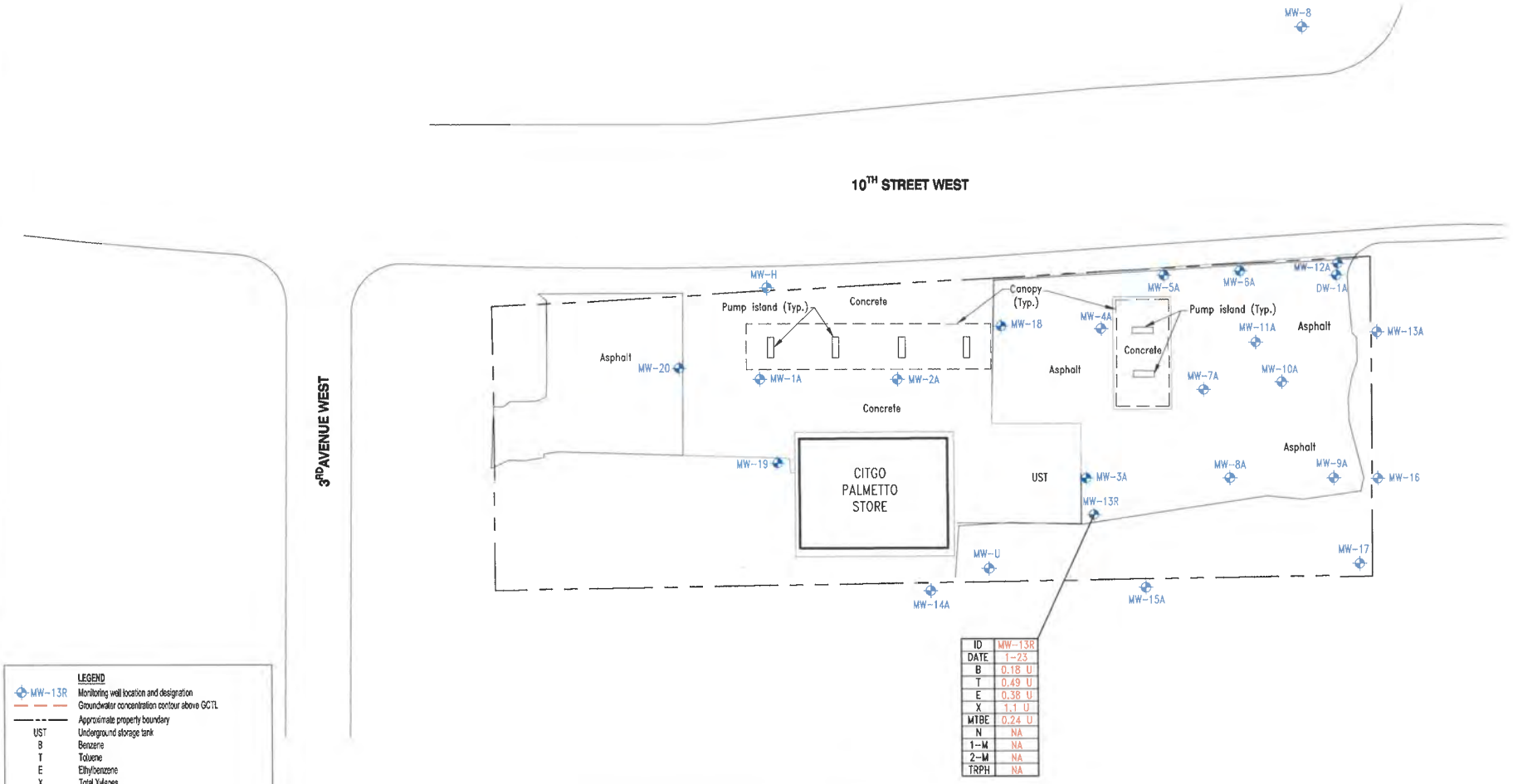
PLOTTED: February 23, 2023 – 1:04 PM, BY: Burton, George A

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CITGO PALMETTO
VERIFICATION SAMPLING REPORT
203 10TH STREET WEST
PALMETTO, MANATEE COUNTY, FLORIDA

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FIGURE: 5



LEGEND

MW-13R	Monitoring well location and designation
	Groundwater concentration contour above GCTL
	Approximate property boundary
UST	Underground storage tank
B	Benzene
T	Toluene
E	Ethylbenzene
X	Total Xylenes
MTBE	Methyl Tert-Butyl Ether
N	Naphthalene
1-M	1-Methylnaphthalene
2-M	2-Methylnaphthalene
TRPH	Total Recoverable Petroleum Hydrocarbons
U	Analyte, if present, was at a concentration below its method detection limit
I	The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit

NOTES:

1. Concentrations in micrograms per liter.
2. Bolded concentrations exceed Groundwater Cleanup Target Levels (GCTL).
3. Concentrations in red represent most current data.

Facility ID#: 41/8624235

0 20 40

SCALE: 1 INCH = 40 FEET

N

GROUNDWATER ANALYTICAL SUMMARY

NO.	DATE	REVISIONS
0	Feb-23	Initial Submittal

DESIGNED AH | DRAWN GB | CHECKED | DATE

F:\CAD\GC003\Terrence\Citgo Palmetto\2023-02\PG-6.dwg

PLOTTED: February 23, 2023 - 12:52 PM BY: Burton, George A

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Tallahassee, Florida

CITGO PALMETTO
VERIFICATION SAMPLING REPORT
203 10TH STREET WEST
PALMETTO, MANATEE COUNTY, FLORIDA

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FIGURE: 6

ORDER NO. C6F92B

Issued on Friday, March 20, 2026 EDT
Created on Friday, March 20, 2026 EDT by TaNylah Nixon (Contracts) on behalf of Naveed Yousafi (Contracts)

SUPPLIER:
HSW Consulting, LLC
15711 Mapledale Blvd, Suite B
Tampa, FL 33624
United States
Phone: +1 813-968-7722
Fax: +1 813-962-2406
Contact: Sara Bennett

TOTAL AMOUNT
$8,703.79000 USD

SHIP TO:
DEP-PETROLEUM RESTORATION PROGRAM
2600 BLAIR STONE RD
BMC RM 420 MS 4575
TALLAHASSEE, FL 32399
United States

BILL TO:
DEP-PETROLEUM RESTORATION PROGRAM
2600 BLAIR STONE RD
BMC RM 420 MS 4575
TALLAHASSEE, FL 32399
United States

DELIVER TO:
Naveed Yousafi (Contracts)

Organization Code:
Description: PETROLEUM RESTORATION PROGRAM
Expansion Opt:
Description:
Object Code:
Description: ENGINEERING SERVICES - ENVIRONMENTAL
Transaction Fee Exempt?: No
Transaction Fee Exempt Reason:

VersionNumber: 1
PUI:
ID: 3701
Name: 3701 - FDEP Contracts
PO Start Date: Friday, March 20, 2026 GMT
PO End Date: Monday, September 14, 2026 GMT
Site Code:
ID: 370000-12
Name: 12
Encumber Funds: Yes
Entity Description: Department of Environmental Protection

LINE ITEM DETAILS (1 LINE ITEM)

NO.	DESCRIPTION	PART NUMBER	QTY	NEED-BY DATE	UNIT PRICE	AMOUNT	ORDER CONFIRMATION STATUS
1	**Contractor has been selected to perform ...**		8,703.79 Dollar	-	$1.00000 USD	$8,703.79000 USD	Unconfirmed

Full Description: Contractor has been selected to perform Technical Support Services/Verification Sampling (TSS/VS) at CITGO-PALMETTO, 203 10TH ST W, PALMETTO, Manatee County, Florida, FAC ID 418624235. Attachment A, Scope of Work, attached to the purchase order (PO) describes the work to be completed by the Contractor. All work shall be performed in accordance with the terms of the Environmental Forensics Site Investigations and Other Technical Support Services Contract (EFSI&OTSSC). The PRP reference number for this project is 907-019C.

Attached hereto and made a part of this PO is Attachment B - Schedule of Pay Items and Other Related Documents. Pay Items are at or below the negotiated maximum rates included in the EFSIC. Contractor must submit the appropriate completed documents from Attachment B to the Task Manager with each deliverable, as instructed. Upon completion and approval of all work under this PO, Contractor shall submit a signed Release of Claims document, along with the final invoice. Contractor must include Subcontractor Utilization Report form, included as a tab on Attachment B, with each invoice.

The Department will retain 10% of the total amount of each payment made. Contractor may submit a request for release of retainage upon completion, and DEP approval of, all work performed under this PO.

The Department will evaluate the Contractor as specified in the EFSI&OTSSC.

The Contractor agrees to perform the services described in the PO in accordance with the terms of its EFSIC (as those terms may have been amended) which are in effect on date of issuance of the PO. The applicable ATC terms are available at the following URL: https://facts.fldfs.com/Search/ContractDetail.aspx?AgencyId=370000&ContractId=GC907

Req. Line No.: 1
Requester: Naveed Yousafi (Contracts)
PR No.: PR929994
Method of Procurement: I - Agency RFP [s 287.057(1) (b), F.S.]
Shipping Method: Best Way
Solicitation #: 2017008C
State Contract ID:
Prime Vendor:
incoTerm:

TOTAL AMOUNT
$8,703.79000 USD

COMMENTS

- TaNylah Nixon (Contracts), 03/16/2026:
  The following attachments are attached hereto and made a part of this Purchase Order:

  Attachment A – Scope of Work
  Attachment B – Schedule of Pay Items & Other Related Documents

  Note:
  Per Chapter No. 2025-199: Implementing the 2025-2026 General Appropriations Act, PRP is not applying the cap, deductible, or copayment for sites eligible under the Petroleum Liability Restoration Program or Petroleum Cleanup Participation Program. (TaNylah Nixon (Contracts), Monday, March 16, 2026 EDT)
- Jaylynn Lowery (Contracts), 03/20/2026:
  Note: Attachment B language appearing in upper right-hand corner titled "Without Handling Fee" is used by the program to identify the total cost less the 6% handling and MFMP fee on reimbursable items. This information is only used as a check point for PRP staff. The total PO amount for the project is the amount appearing in the "Total Extended Cost" section in the upper right-hand side of the spreadsheet. (Jaylynn Lowery (Contracts), Friday, March 20, 2026 EDT)

ATTACHMENTS

- ATTACHMENT by **TaNylah Nixon (Contracts)** on *Monday, March 16, 2026 at 9:52 AM*
  AttachmentB-SPI-418624235-TSS-VS.zip (827493 bytes)
- ATTACHMENT by **TaNylah Nixon (Contracts)** on *Monday, March 16, 2026 at 1:59 PM*
  AttachmentA-SOW-418624235-TSS-VS.pdf (340602 bytes)

TERMS AND CONDITIONS OF PURCHASE

Purchase Order Terms & Conditions

http://dms.myflorida.com/mfmp_PO_TC

Attachment A
Division of Waste Management
Scope of Work

9-Digit Facility ID Number: 418624235
STCM Facility Name: Citgo-Palmetto

SubPhase(s): TSS/VS

Specifications

All work must be performed in accordance with this Scope of Work (SOW) and any attachments, Chapters 62-160, 62-532, 62-777 and 62-780, F.A.C., all applicable FDEP and Water Management District guidance memoranda, standard industry procedures and as described in the Agency Term Contract (ATC).

Copies of all referenced guidelines are available at:
http://www.dep.state.fl.us/waste/categories/pcp/default.htm

Reports must be submitted using the appropriate FDEP forms found at:
http://www.dep.state.fl.us/waste/categories/pcp/pages/pg_documents.htm

All work must be conducted in accordance with PRP Standard Specification Details found at:
http://www.dep.state.fl.us/waste/categories/pcp/pages/templates.htm

The following tables are included as attachments to this SOW and further represent the details of the scope of work.

☑ Water Sampling Table

Task 1 Description:	This purchase order is to authorize Geosyntec to perform groundwater verification sampling. Prepare and submit a Health and Safety Plan (HASP). Please note that per the FDEP site access Agreement, a separate site access agreement between the owner and the ATC has been requested by the property owner. Submit an email or letter (copying the owner) indicating either that this separate site access agreement has been executed or that the owner no longer wants such an agreement with the contractor (in other words, the owner is content with the current FDEP site access agreement). The FDEP does not need a copy of the agreement
Task 1 Deliverable:	HASP and email confirmation of separate site access agreement
Task 1 Deliverable Due Date:	Wednesday, May 6, 2026
Task 2 Description:	Mobilize to the site to collect water samples as per attached Water Sampling table and figure.Extracted water may be discharged onto a paved area and allowed to evaporate if it is not mixed with free product and will not affect uncontaminated areas or flow beyond the source property boundaries or into a storm water drain. Obtain the off-site agreement for the MW-13A and MW-16. Prepare and submit a PG/PE certified Quarterly Natural Attenuation Monitoring(NAM) report. Contingent Funding in this task is only to be used to offset the cost for pay items associated with a Field Request for Change for any open task.
Task 2 Deliverable:	Quarterly NAM Report
Task 2 Deliverable Due Date:	Wednesday, July 15, 2026
PO End Date:	**Monday, September 14, 2026**

Schedule of Pay Items (SPI)

All unit rates and extended prices for all line item costs associated with this project are provided in the SPI [Attachment B to this Purchase Order (PO)] and shall not exceed the rates established in the ATC.

Attachment A
Division of Waste Management
Scope of Work

9-Digit Facility ID Number: 418624235
STCM Facility Name: Citgo-Palmetto

Requests for Change (RFC)
All requests for changes to the SOW must be submitted in writing and be approved in writing by the FDEP/LP using the RFC form in accordance with paragraphs 2.A and 26 of the ATC and can be found at:

http://www.dep.state.fl.us/waste/categories/pcp/pages/templates.htm

Any change which results in an extension of the due dates, PO end date, or a change in quantities or costs, requires that a PO Change Order be formally issued prior to performance of the revised SOW.

Performance Measures
The FDEP/LP Site Manager will review the submitted documentation to confirm that all work was performed in accordance with the Specifications referenced above. The FDEP/LP Task Manager will notify the Contractor of acceptance or any deficiencies in the work and/or deliverables. The Contractor will be given an opportunity to remedy deficiencies at no additional cost to the FDEP.

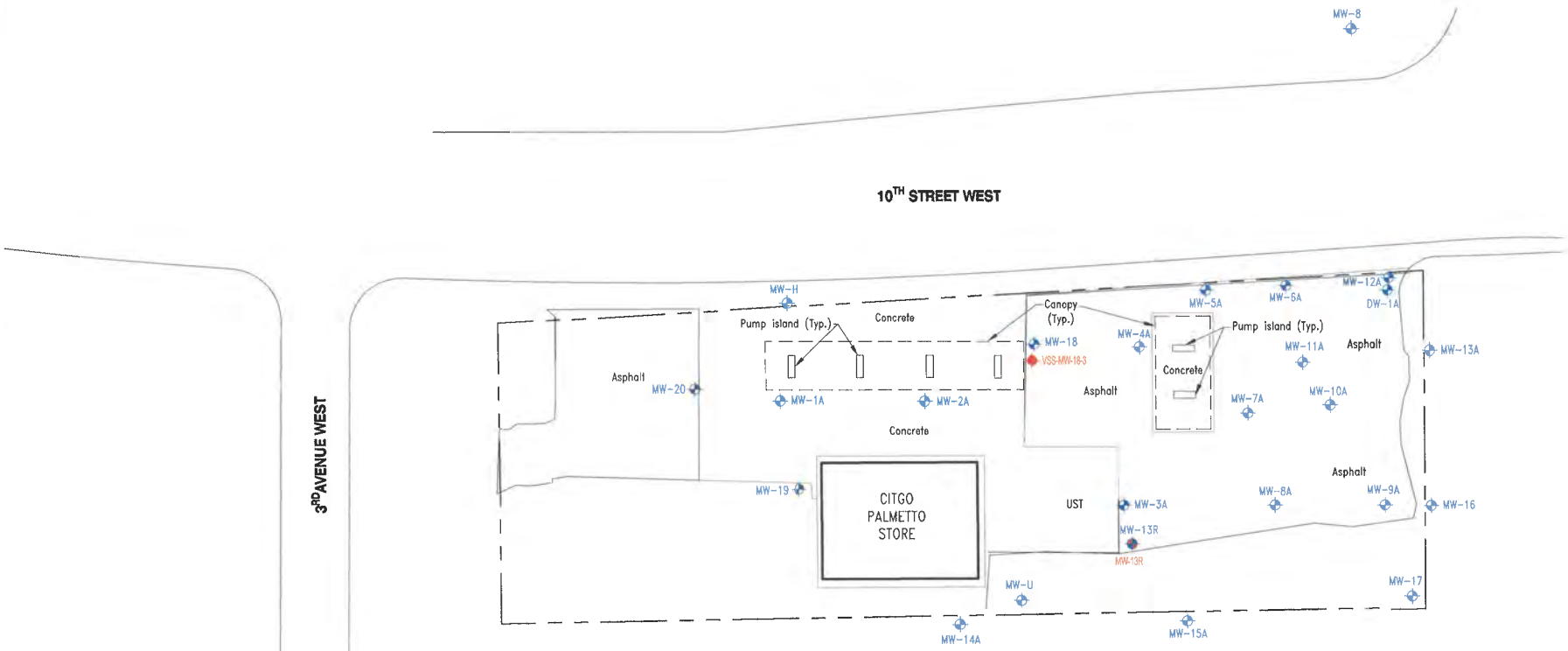
The FDEP/LP Task Manager will review the work and/or deliverables within the timeframes established in FDEP guidance documents. The Contractor will respond to any comments to complete the work and/or deliverables within the timeframe established in the comment letter or email correspondence.

Invoicing, Payments and Financial Consequences
The Contractor may submit an invoice for a Task upon written notification of acceptance of the work/deliverables by the FDEP/LP Task Manager. Upon receipt of FDEP/LP written approval of the required documentation for completed portions of each task, the Contractor must submit an invoice. Invoices for completed work may be submitted no more frequently than every thirty (30) days, or upon completion of the individual tasks as specified. Each invoice request must contain all documentation of performance as specified in the ATC, this Purchase Order (PO), and its attachments.

Failure to provide all deliverables, failure to provide deliverables which are satisfactory or failure to meet the specified deliverable timetables, shall result in non-payment, loss of retainage, or other financial consequences, and/or termination of the PO, as specified in the ATC. If the deliverable due day occurs on a weekend, state holiday, or federal holiday the deliverable will be due the following business day.

Retainage shall be withheld in the amount of 10%, unless otherwise noted in the SPI, from each payment by the FDEP/LP until completion and approval of all Tasks. The Contractor shall submit a Release of Claims and request for retainage payment with the final invoice. Payment of retainage will be reduced by the amount of any assessed financial consequences.

Notice of Field Activities
The Contractor must provide written notification (emails are acceptable) of field activities at least seven (7) calendar days prior to the commencement of work to all applicable parties including the FDEP/LP task manager, Inspector (PRP_Inspector@dep.state.fl.us), site operator, site owner, RP and affected off-site property owners.



LEGEND

MW-15	Monitoring well location and designation
VSS-MW-18-3	Soil boring location and designation
----------	Approximate parcel boundary
UST	Underground storage tank

Facility ID#: 41/8624235

0 20 40

SCALE: 1 INCH = 40 FEET

N

SITE MAP WITH SAMPLE LOCATIONS

NO.	DATE	REVISIONS
0	Feb-23	Initial Submittal

DESIGNED: AH | DRAWN: GB | CHECKED: | DATE:

P:\CAD\GIS\GIS\Tallahassee\Citgo Palmetto\2023-02\FIG-3.dwg

PLOTTED: February 23, 2023 - 1:38 PM, BY: Burton, George A

WSP USA Environment & Infrastructure, Inc.
Tallahassee, Florida

CITGO PALMETTO
VERIFICATION SAMPLING REPORT
203 10TH STREET WEST
PALMETTO, MANATEE COUNTY, FLORIDA

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FIGURE: 2

Site No. 56

Murphy USA #7322

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/23/2026 Last Data Refresh: 03/22/2026 Report Generated from DOPPLER

District	Southwest	**Type**	Retail Station
County	Manatee	**Status**	OPEN
ID	9807995	**Latitude**	27° 31' 17.33
Name	MURPHY USA #7322 512 10TH ST E PALMETTO, FL 34221	**Longitude**	82° 33' 34.42
		LL Method	DPHO
Contact	STORE MGR	**LL Status**	REVIEWED
Phone	(407) 931-5229	**Status Date**	03/30/2006

Account Owner Information

Name	MURPHY OIL USA INC 200 PEACH ST El Dorado, AR 71730	**Effective Date**	03/17/2006
Contact	KRYSTAL TERRELL /STEPHEN POWLUS / JIM MCPHAIL		
Phone	(870) 677-6116		
Email	KRYSTAL.TERRELL@MURPHYUSA.COM		
		Placard # / Date	713932 - 06/03/2025

No Property Owner Information Found

Tank	Tank Size	Content	Installed	Placement	Status
1	20000	Unleaded Gas (B)	03/01/2006	UNDERGROUND	In Service (U)

Constructions **Pipings** **Monitorings**

(A) Ball check valve
(E) Fiberglass
(I) Double wall
(M) Spill containment bucket
(N) Flow shut-Off
(O) Tight fill
(P) Level gauges/alarms

(J) Pressurized piping system
(K) Dispenser liners
(M) Double wall - pipe jacket
(N) Approved synthetic material

(2) Visual inspect pipe sumps
(3) Electronic monitor pipe sumps
(4) Visual inspect dispenser liners
(5) Electronic monitor dispenser liners
(F) Monitor dbl wall tank space
(H) Mechanical line leak detector
(K) Monitor dbl wall pipe space

Tank	Tank Size	Content	Installed	Placement	Status
2	20000	Unleaded Gas (B)	03/01/2006	UNDERGROUND	In Service (U)

Constructions
(A) Ball check valve
(E) Fiberglass
(I) Double wall
(L) Compartmented
(M) Spill containment bucket
(N) Flow shut-Off
(O) Tight fill
(P) Level gauges/alarms

Pipings
(J) Pressurized piping system
(K) Dispenser liners
(M) Double wall - pipe jacket
(N) Approved synthetic material

Monitorings
(2) Visual inspect pipe sumps
(3) Electronic monitor pipe sumps
(4) Visual inspect dispenser liners
(5) Electronic monitor dispenser liners
(F) Monitor dbl wall tank space
(H) Mechanical line leak detector
(K) Monitor dbl wall pipe space

Insurance Documents

FR Type	Effective Date	Expiration Date	Company Name
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	01/01/2025	04/30/2026	
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	01/01/2023	04/30/2024	
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2021	04/30/2022	
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2020	04/30/2021	

SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2019	04/30/2020
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2018	04/30/2019
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2017	04/30/2018
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2016	04/30/2017
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2015	04/30/2016
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2013	04/30/2014
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2011	04/30/2012
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2010	04/30/2011
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	05/01/2009	04/30/2010

System Tests

Type	Due Date
INTEGRITY TEST - STP SUMP	05/31/2026
INTEGRITY TEST - DISPENSER SUMP	05/31/2026
INTEGRITY TEST - SINGLE-WALLED SPILL BUCKET	06/30/2025
INTEGRITY TEST - SINGLE-WALLED SPILL BUCKET	04/30/2026
ANNUAL OPERABILITY - RELEASE DETECTION	04/30/2026
ANNUAL OPERABILITY - RELEASE DETECTION	06/30/2025
ANNUAL OPERABILITY - OVERFILL PROTECTION	06/30/2025
ANNUAL OPERABILITY - OVERFILL PROTECTION	04/30/2026
ANNUAL OPERABILITY - LINE LEAK DETECTOR	04/30/2026
ANNUAL OPERABILITY - LINE LEAK DETECTOR	06/30/2025

No Legacy Data Found

Compliance Activity Information

Activity Code	Date Completed	Results	Inspector	AST/UST Count	Description

Letter	01/05/2026	Satisfied	SHANBERG_VJ_1		Routine Compliance
Site Inspection	01/05/2026	In Compliance	SHANBERG_VJ_1	0/2	Routine Compliance
Electronic Communication	01/02/2026	Satisfied	SHANBERG_VJ_1		Routine Compliance
Issue Document	01/02/2026	Satisfied	SHANBERG_VJ_1		Routine Compliance
Record Document	08/22/2023	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Letter	08/22/2023	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Letter	08/11/2023	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Electronic Communication	08/11/2023	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	08/11/2023	Major Out of Compliance	TRETHEWEY_MB_1	0/2	Routine Compliance
Issue Document	08/11/2023	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Enforcement Tracking	07/05/2022	Closed Without Enforcement	WILKERSON_P		Enforcement
Enforcement Tracking	11/17/2021	Closed Without Enforcement	WILKERSON_P		Enforcement
Issue Document	08/25/2021	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	08/25/2021	In Compliance	TRETHEWEY_MB_1	0/2	Routine Compliance
Issue Document	08/24/2021	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Enforcement Referral	09/30/2020	Accepted	TRETHEWEY_MB_1		Enforcement
Enforcement Referral	09/30/2020	Accepted	TRETHEWEY_MB_1		Enforcement
Electronic Communication	09/04/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance

Electronic Communication	09/04/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Electronic Communication	09/04/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	03/23/2020	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Letter	03/23/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Electronic Communication	03/23/2020	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	03/23/2020	Minor Out of Compliance	TRETHEWEY_MB_1	0/2	Routine Compliance
Site Inspection	08/14/2017	In Compliance	TRETHEWEY_MB_1	0/2	Routine Compliance
Electronic Communication	08/14/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	08/14/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	08/14/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	03/31/2016	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Letter	03/31/2016	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	03/31/2016	Minor Out of Compliance	TRETHEWEY_MB_1	0/2	Routine Compliance
Record Document	04/11/2014	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	01/30/2014	Minor Out of Compliance	TRETHEWEY_MB_1	0/2	Routine Compliance
Letter	01/30/2014	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	08/31/2011	In Compliance	MASON_RS_1	0/2	Routine Compliance

Site Inspection	08/18/2010	In Compliance	TRETHEWEY_MB_1	0/2	Routine Compliance
Site Inspection	08/20/2009	In Compliance	TRETHEWEY_MB_1	0/2	Routine Compliance
Site Inspection	07/15/2008	In Compliance	TRETHEWEY_MB_1	0/2	Routine Compliance
Site Inspection	07/18/2007	Minor Out of Compliance	TRETHEWEY_MB_1	0/2	Routine Compliance
Letter	07/18/2007	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Emergency Preparedness Information	05/21/2007	Satisfied	REEDER_JH_1		Routine Compliance
Emergency Preparedness Information	02/14/2007	Satisfied	REEDER_JH_1		Routine Compliance
Emergency Preparedness Information	09/22/2006	Satisfied	REEDER_JH_1		Routine Compliance
Site Inspection	06/01/2006	In Compliance	REEDER_JH_1	0/2	Installation
Record Document	05/31/2006	Satisfied	REEDER_JH_1		Installation

No Open AOCs Found

No Open Violations Found

No Discharges Found

Florida Department of Environmental Protection
Twin Towers Office Bldg. 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400
Division of Waste Management
Petroleum Storage Systems
Storage Tank Facility Routine Compliance Site Inspection Report

Facility Information:

Facility ID: 9807995
Facility Type: A - Retail Station
Facility Name: MURPHY USA #7322
512 10TH ST E
PALMETTO, FL 34221
Latitude: 27° 31' 17.33"
Longitude: 82° 33' 34.42"
LL Method: DPHO

County: MANATEE

Inspection Date:12/23/2025

# of inspected ASTs: 0
USTs: 2
Mineral Acid Tanks: 0

Inspection Result:

Result: In Compliance

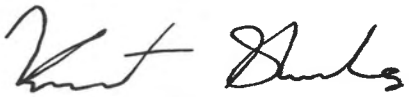
Signatures:

TKMNEM - MANATEE-HILLSBOROUGH COUNTY ENVIRO PROT COMM (813) 627-2600

Storage Tank Program Office and Phone Number

Vincent Shanberg

Inspector Name



Inspector Signature
Principal Inspector

MANATEE-HILLSBOROUGH COUNTY ENVIRO PROT COMM

Emailed to Stephen Powlus

Representative Name

No Signature

Representative Signature

Murphy USA

Emailed to Karen Allen

Representative Name

No Signature

Representative Signature

Murphy USA

Emailed to ENVIRONMENTAL@MURPHYUSA.COM

Representative Name

No Signature

Representative Signature

Owners of UST facilities are reminded that the Federal Energy Policy Act of 2005 and 40 CFR 280 Subpart J requires Operator Training at all facilities by October 13, 2018. For further information please visit: https://floridadep.gov/waste/permitting-compliance-assistance/content/underground-storage-tank-operator-training

Financial Responsibility:

Financial Responsibility: SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER

Insurance Carrier:

Effective Date: 01/01/2025 Expiration Date: 04/30/2026

Findings:

Class A Owner Training Certificates are present.
Class B Maintenance Training Certificates are present.
Class C Operator Training Certificates are present.

Completed System Tests

Type	Date Completed	Results	Reviewed	Next Due Date	Comment
Annual Operability - Line Leak Detector	04/08/2025	Passed	01/05/2026	04/30/2026	
Annual Operability - Line Leak Detector	06/11/2024	Passed	01/05/2026	06/30/2025	
Annual Operability - Overfill Protection	04/08/2025	Passed	01/05/2026	04/30/2026	
Annual Operability - Overfill Protection	06/11/2024	Passed	01/05/2026	06/30/2025	
Annual Operability - Release Detection	04/08/2025	Passed	01/05/2026	04/30/2026	
Annual Operability - Release Detection	06/11/2024	Passed	01/05/2026	06/30/2025	
Integrity Test - Dispenser Sump	05/16/2023	Passed	01/05/2026	05/31/2026	
Integrity Test - STP Sump	05/16/2023	Passed	01/05/2026	05/31/2026	
Integrity Test - Single-walled Spill Bucket	04/08/2025	Passed	01/05/2026	04/30/2026	
Integrity Test - Single-walled Spill Bucket	06/11/2024	Passed	01/05/2026	06/30/2025	

Reviewed Records

Record Category	Record type	From Date	To Date	Reviewed Record Comment
Three Years	Monthly Maint. Visual Examinations and Results	01/08/2024	07/17/2025	
Three Years	Electronic Release Detection Equip. Monthly Checks	08/01/2023	11/01/2025	
Three Years	Certificate of Financial Responsiblity	01/01/2025	12/23/2025	

Inspection Comments

12/23/2025
RECORDS: #9807995, 12/23/2025

Placard: #713932; issued 06/03/2025, 2 tanks listed (one is compartmented).

Financial Responsibility: Self-Insurance, 01/01/2025- 04/30/2026.

CoFR: Provided with FR.

Release Detection:
a. This Facility has the following release detection methods:
1. Veeder-Root TLS-350 console (EQ #197) with high/low liquid level sensors in the interstice of both tanks. Float sensors are located in all three STP sumps and ten dispenser liners for interstitial monitoring of the double-wall piping. Mechanical Line Leak Detectors for the primary piping and monthly visual inspections of the single wall fills. NOTE: Visual Inspections for the electronically monitored components (STP sumps and dispenser liners) are required at least every six months.

b. Facility's monthly release detection results:
1. Facility documents Liquid Status and Alarm History electronically, verification from 08/01/2023 to 11/01/2025 was provided. Note: Liquid Status and Alarm History Tapes collected during this inspection are attached.

2. Reviewed the monthly visual inspection records of the single wall spill buckets from 08/01/2023 to 11/01/2025. Monthly visual inspections are documented at least once a month not exceeding 35 days apart. Visual inspections required at least once every six months were performed on 01/08/2024, 07/08/2024, 01/27/2025 and 07/17/2025.

Tests:
1. The annual operability test of the monitor and sensors was performed on 04/08/2025 by Tanknology, system passed. Next tests are due by 04/30/2026. Tests were also provided for 06/11/2024.

2. The annual operability test of the Mechanical Line Leak Detectors was performed on 04/08/2025 by Tanknology, system passed. Next tests are due by 04/30/2026. Tests were also provided for 06/11/2024.

3. The annual operability test of the overfill protection devices was performed on 04/08/2025 by Tanknology, system passed. Next tests are due by 04/30/2026. Tests were also provided for 06/11/2024.

4. Hydrostatic tests of the single walled spill buckets were performed on 04/08/2025 by Tanknology, system passed. Next tests are due by 04/30/2026. Tests were also provided for 06/11/2024.

5. Hydrostatic tests of the sumps and liners were performed 05/16/2023 by Valley Tank Testing Inc., all passed. The next tests are due by 05/31/2026.

PHYSICAL:
STP Sumps: The Southernmost Regular STP sump had liquid present and was pumped out during inspection. All other sumps are dry. The Northernmost Regular STP head has corrosion, photos were provided of STP head painted and corrosion was removed on 12/23/2025.
Note: The Regular storage tank has two (2) STP sumps

Dispenser Liners: Inspected Dispenser #s 1/2, 3/4, 5/6, 7/8, 9/10, 11/12, 13/14, 15/16, 17/18 and 19/20. All liners are clean and dry.

Fills: Covers properly painted, fills are unobstructed.

Shear Valves: All shear valves are rigidly anchored.

Inspection Photos

Added Date 01/02/2026

9807995 Tank field 12-23-2025



Florida Department of Environmental Protection
Twin Towers Office Bldg. 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400
Division of Waste Management
Petroleum Storage Systems
Storage Tank Facility Routine Compliance Site Inspection Report

Facility Information:

Facility ID: 9807995
Facility Type: A - Retail Station
Facility Name: MURPHY USA #7322
512 10TH ST E
PALMETTO, FL 34221
Latitude: 27° 31' 17.33"
Longitude: 82° 33' 34.42"
LL Method: DPHO

County: MANATEE

Inspection Date:08/09/2023

# of inspected ASTs: 0
USTs: 2
Mineral Acid Tanks: 0

Inspection Result:

Result: Major Out of Compliance

Signatures:

TKMNEM - MANATEE-HILLSBOROUGH COUNTY ENVIRO PROT COMM (813) 627-2600

Storage Tank Program Office and Phone Number

Mark B. Trethewey
Inspector Name


Inspector Signature
Principal Inspector

MANATEE-HILLSBOROUGH COUNTY ENVIRO PROT COMM

E-mailed to Amanda Boshears 8/11/2023
Representative Name

No Signature
Representative Signature

Owners of UST facilities are reminded that the Federal Energy Policy Act of 2005 and 40 CFR 280 Subpart J requires Operator Training at all facilities by October 13, 2018. For further information please visit: https://floridadep.gov/waste/permitting-compliance-assistance/content/underground-storage-tank-operator-training

Financial Responsibility:

Financial Responsibility: SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER

Insurance Carrier:

Effective Date: 01/01/2023

Expiration Date: 04/30/2024

Findings:

Class A Owner Training Certificates are present.
Class B Maintenance Training Certificates are present.

Class C Operator Training Certificates are present.

Completed System Tests

Type	Date Completed	Results	Reviewed	Next Due Date	Comment
Annual Operability - Line Leak Detector	06/21/2023	Passed	08/11/2023	06/21/2024	
Annual Operability - Line Leak Detector	08/25/2022	Passed	08/11/2023	08/25/2023	
Annual Operability - Overfill Protection	06/21/2023	Passed	08/11/2023	06/21/2024	
Annual Operability - Overfill Protection	08/25/2022	Passed	08/11/2023	08/25/2023	
Annual Operability - Release Detection	06/21/2023	Passed	08/11/2023	06/21/2024	
Annual Operability - Release Detection	08/25/2022	Passed	08/11/2023	08/25/2023	
Cathodic Survey - Sacrificial Anode	06/21/2023	Passed	08/11/2023	06/21/2026	
Integrity Test - Dispenser Sump	08/11/2020	Passed	08/24/2021	08/11/2023	
Integrity Test - STP Sump	06/21/2023	Passed	08/11/2023	06/21/2026	
Integrity Test - STP Sump	08/11/2020	Passed	08/24/2021	08/11/2023	
Integrity Test - Single-walled Spill Bucket	06/21/2023	Passed	08/11/2023	06/21/2024	
Integrity Test - Single-walled Spill Bucket	08/25/2022	Passed	08/11/2023	08/25/2023	

Reviewed Records

Record Category	Record type	From Date	To Date	Reviewed Record Comment
Three Years	Certificate of Financial Responsiblity	01/01/2023	04/30/2024	
Three Years	Electronic Release Detection Equip. Monthly Checks	08/01/2021	07/23/2023	
Three Years	Monthly Maint. Visual Examinations and Results	08/08/2021	08/01/2023	

Violations:

Type: Violation
Significance: SNC-B
Rule: 62-761.700(1), 62-761.700(1)(a), 62-761.700(1)(a)1, 62-761.700(1)(a)2
Violation Text: Not repaired or isolated component or piping which has not caused a discharge or release.

Explanation: There is corrosion on the North Regular STP head and piping.
Corrective Action: Remove corrosion and repaint affected areas.

Inspection Comments

08/11/2023
RECORDS: #9807995, 8/9/2023

Placard: #652442; issued 6/1/2023, 2 tanks listed (one is compartmented).

Financial Responsibility: Self-Insurance, 1/1/2023- 4/30/2024.

CoFR: Provided with FR.

Release Detection:

a. This Facility has the following release detection methods:

1. Veeder-Root TLS-350 console (EQ #197) with high/low liquid level sensors in the interstice of both tanks. Float sensors are located in all three STP sumps and ten dispenser liners for interstitial monitoring of the double-wall piping. Mechanical Line Leak Detectors for the primary piping and monthly visual inspections of the single wall fills.

NOTE: Visual Inspections for the electronically monitored components (STP sumps and dispenser liners) are required at least every six months.

b. Facility's monthly release detection results:

1. Facility documents Liquid Status and Alarm History electronically, verification from 7/25/2020 to 7/23/2023 was provided. Note: Liquid Status and Alarm History Tapes collected during this inspection are attached.

2. Reviewed the monthly visual inspection records of the single wall spill buckets from 8/8/2021 to 8/1/2023. Inspection for 2023 are not dated. Ensure that monthly visual inspections are documented at least once a month not exceeding 35 days apart. Visual inspections required at least once every six months were performed on 1/4 /2022, 7/5/2022, 1/9/2023 and 6/21/2023.

Tests:

1. The annual operability test of the monitor and sensors was performed on 6/21/2023 by Valley Tank, system passed. Next tests are due by 6/21/2024. Tests were also provided for 9/21/2021 and 8/25/2022.

2. The annual operability test of the Mechanical Line Leak Detectors was performed on 6/21/2023 by Valley Tank, system passed. Next tests are due by 6/21/2024. Tests were also provided for 9/21/2021 and 8/25/2022.

3. The annual operability test of the overfill protection devices was performed on 6/21/2023 by Valley Tank, system passed. Next tests are due by 6/21/2024. Tests were also provided for 9/21/2021 and 8/25/2022.

4. Hydrostatic tests of the single walled spill buckets were performed on 6/21/2023 by Valley Tank, system passed. Next tests are due by 6/21/2024. Tests were also provided for 9/21/2021 and 8/25/2022.

5. Hydrostatic tests of the sumps and liners were performed 6/21/2023 by Valley Tank Testing Inc., all passed. The next tests are due by 6/21/2026.

PHYSICAL:

STP Sumps: All sumps are dry with little or no corrosion. The Northernmost Regular STP head has corrosion, remove any corrosion and repaint affected areas.

Dispenser Liners: Inspected Dispenser #s 1/2, 3/4, 5/6, 7/8, 9/10, 11/12, 13/14, 15/16, 17/18 and 19/20. All liners are clean and dry.

Fills: Covers properly painted, fills are unobstructed.

Shear Valves: All shear valves are rigidly anchored.

Inspection Photos

Added Date 08/11/2023

TCI 8-9-2023 North regular STP corrosion



Added Date 08/11/2023

TCI 8-9-2023 photo update



Site No. 57

Walmart Supercenter #3370; Genes Truck Service; Taylor Concrete Inc.

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/23/2026 Last Data Refresh: 03/22/2026 Report Generated from DOPPLER

District	Southwest	**Type**	Fuel user/Non-retail
County	Manatee	**Status**	OPEN
ID	9815770	**Latitude**	27° 31' 25.7232
Name	WALMART SUPERCENTER #3370 508 10TH ST E PALMETTO, FL 34221-4062	**Longitude**	82° 33' 33.2352
		LL Method	DPHO
Contact		**LL Status**	REVIEWED
Phone		**Status Date**	02/14/2018

Account Owner Information

Name	WAL-MART STORES EAST LP C/O APTIM 8725 Rosehill Rd Lenexa, KS 66215-4611	**Effective Date**	05/28/2020
Contact	LICENSING SUPPORT / SALLY KNIGHT		
Phone	(877) 829-5505		
Email	WALMARTEPMSUPPORT@APTIM.COM		
		Placard # / Date	716538 - 06/05/2025

Property Owner Information

Name	WAL-MART STORES EAST LP C/O APTIM 8725 Rosehill Rd Lenexa, KS 66215-4611	**Effective Date**	05/28/2020
Contact	LICENSING SUPPORT / SALLY KNIGHT		
Phone	(877) 829-5505		

Email WALMARTEPMSUPPORT@APTIM.COM

Tank	Tank Size	Content	Installed	Placement	Status
T1	2000	Emerg Generator Diesel (G)	08/31/2017	ABOVEGROUND	In Service (U)

Constructions
(C) Steel
(G) Sacrificial anode CP
(I) Double wall
(M) Spill containment bucket
(P) Level gauges/alarms

Pipings
(A) Abv, no soil contact
(B) Steel/galvanized metal
(D) External protective coating
(F) Double wall

Monitorings
(D) SPCC Plan
(F) Monitor dbl wall tank space
(K) Monitor dbl wall pipe space
(Q) Visual inspection of ASTs

Insurance Documents

FR Type	Effective Date	Expiration Date	Company Name
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER			
INSURANCE	05/01/2024	05/01/2025	INDIAN HARBOR INSURANCE COMPANY
INSURANCE	05/01/2023	05/01/2024	INDIAN HARBOR INSURANCE COMPANY
INSURANCE	05/01/2022	05/01/2023	INDIAN HARBOR INSURANCE COMPANY
INSURANCE	05/01/2021	05/01/2022	INDIAN HARBOR INSURANCE COMPANY
INSURANCE	05/01/2020	05/01/2021	ILLINOIS UNION INSURANCE COMPANY
INSURANCE	06/01/2019	06/01/2020	AIG SPECIALTY INSURANCE COMPANY
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	01/01/2018	04/30/2019	
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	06/23/2017	06/23/2018	

System Tests

Type	Due Date
ANNUAL OPERABILITY - RELEASE DETECTION	07/31/2025
ANNUAL OPERABILITY - OVERFILL PROTECTION	07/31/2025

No Legacy Data Found

Compliance Activity Information

Activity Code	Date Completed	Results	Inspector	AST/UST Count	Description
Site Inspection	08/29/2024	In Compliance	SHANBERG_VJ_1	1/0	Routine Compliance
Letter	08/29/2024	Satisfied	SHANBERG_VJ_1		Routine Compliance
Electronic Communication	08/27/2024	Satisfied	SHANBERG_VJ_1		Routine Compliance
Issue Document	08/16/2024	Satisfied	SHANBERG_VJ_1		Routine Compliance
Record Document	11/03/2021	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	11/03/2021	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	07/28/2021	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	07/28/2021	Major Out of Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Letter	07/28/2021	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	03/26/2019	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	03/26/2019	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	03/26/2019	In Compliance	TRETHEWEY_MB_1	1/0	Routine Compliance
Issue Document	09/22/2017	Satisfied	TRETHEWEY_MB_1		Installation

Site Inspection	09/22/2017	In Compliance	TRETHEWEY_MB_1	1/0	Installation

No Open AOCs Found

No Open Violations Found

No Discharges Found

February 2004



Combined Phase I and Phase II Environmental Site Assessment

WAL★MART - PALMETTO, FL
STORE No. 94660-00, NEWSC
PALMETTO SITE

Section 13, Township 34 S, Range 17 E
Manatee County, FL

Prepared for:
Wal★Mart Stores East, Inc.
2001 SE 10th Street
Bentonville, AR 72716-0550

Prepared by:
Kimley-Horn and Associates, Inc.
8711 Perimeter Par Blvd., Suite 4
Jacksonville, FL 32216

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KHA Project No. 047253397 L(3130) E(2730)

COMBINED PHASE I AND PHASE II ENVIRONMENTAL SITE ASSESSMENT

WAL★MART - PALMETTO, FL
STORE NO. 94660-00, NEWSC
PALMETTO SITE

SECTION 13, TOWNSHIP 34 SOUTH, RANGE 17 EAST
MANATEE COUNTY, FLORIDA

Prepared for:

Wal★Mart Stores East, Inc.
2001 SE 10th Street
Bentonville, AR 72716 - 0550



Prepared by:

Kimley-Horn and Associates, Inc.
8711 Perimeter Park Blvd., Suite 4
Jacksonville, FL 32216

Jason C. Sheasley, PG, CHMM
Senior Hydrogeologist

David Goldman, PG
Senior Hydrogeologist

FEBRUARY 2004
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047253397 L(3130) E(2730)

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This document, together with the concepts and designs presented herein, as an instrument of service, is intended only for the specific purpose and client for which it was prepared. Reuse of and improper reliance on this document without written authorization and adaptation by Kimley-Horn and Associates, Inc. shall be without liability to Kimley-Horn and Associates, Inc.

1.0 INTRODUCTION

Kimley-Horn and Associates, Inc. (Kimley-Horn) was retained by Wal★Mart Stores East, (ESA) Inc. to conduct a combined Phase I and Phase II Environmental Site Assessment on an approximately 30.1-acre site located in Section 13, Township 34 South, Range 17 East, Manatee County, Florida. The subject Site is an irregular-shaped parcel located at the northeast corner of U.S. Highway 301 (10th Street East) and U.S. Highway 41 in the city of Palmetto (**Figure 1**). The subject Site consists of properties owned by three different individuals. For the purposes of this report, each of the properties located within the subject site will be referenced to by the name of the property owner (Mayr Property, Creel Property, and Taylor Property). Haskos Road, owned by Manatee County, will be improved for use as an access point, but will not be purchased by Wal★Mart. Therefore, an assessment of the Haskos Road property is not included in this report. The purpose of this investigation was to identify obvious indications of potential environmental liabilities that may exist on the subject site.

The findings contained in this document are based on observations of Kimley-Horn's professional staff as well as information obtained from readily available federal, state, county and city agencies. This assessment was conducted using currently accepted principles and methods designed to comply with those applicable sections outlined in the American Society for Testing and Materials (ASTM) Standard Practices E-1527-00.

This assessment represents a reasonable attempt to identify potential sources of contamination on or around the subject site through the implementation of the methodology and the use of resources described above. These potential sources of contamination are defined as recognized environmental conditions (RECs) in ASTM 1527-00. There is always the possibility that RECs have escaped detection due to the limitation of this study, the inaccuracy of governmental records, or the presence of undetected or unreported environmental accidents.

This report is provided for the sole use of Wal★Mart Stores East, Inc. It is the understanding of Kimley-Horn that the subject site will be developed as a commercial retail facility. Use of this report by any third parties will be at the party's sole risk, and Kimley-Horn disclaims any liability for any such uses or reliance by third parties.

1.1 Purpose

The purpose of this investigation was to provide a preliminary assessment of the recognized environmental conditions located on or immediately within the vicinity of the Site. Depending upon their nature and extent, existing environmental conditions could impact the proposed construction activities

associated with the site. This may include, but is not limited to the following: unacceptable worker exposure to contamination, exacerbation of existing environmental conditions, and the removal and disposal of contaminated materials (soil, ground water and debris) during construction.

1.2 SCOPE OF WORK

The methodology for the completion of this combined Phase I/Phase II assessment consisted of the following activities:

- A site reconnaissance to visually examine and photograph the property and surrounding area within a 0.25 mile radius of the subject site to document existing site conditions.

- A review of available historic aerial photographs of the site and the immediate vicinity.

- A review of available Polk and Hill-Donnelly City Directories, for the City of Palmetto.

- A review of the records at the Manatee County Environmental Health Department and Florida Department of Environmental Protection's (FDEP) on-line data management system (OCULUS) to obtain information pertaining to sites within a 0.5 mile distance from the subject site (e.g.: underground storage tank registrations, site plans, laboratory results, etc.).

- A review of available information pertaining to the regional geology/hydrogeology.

- A review of information generated by Environmental FirstSearch Inc. (FirstSearch), which includes a search of state and federal databases, including the National Priority List (NPL), Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), Corrective Action Report (CORRATS), Resource Conservation and Recovery Information System (RCRIS), Emergency Response Notification System (ERNS), State Hazardous Waste (SHWS), Facility Index System/Facility Identification Initiative Program Summary Report (FINDS), Toxic Chemical Release Inventory System (TRIS), State Landfill (SWF/LF), Underground Storage Tanks (UST)/ Petroleum Contamination Detail report (PCT01), Stationary Tank Inventory Facility/Owner/Tank report (STI02), Leaking Underground Storage Tank Incident Reports (LUST), and Dry Cleaners.

- Access and review of federal database information through the United States Environmental Protection Agency (USEPA) Envirofacts system on documented sites within 1.0 mile of the Site.

- A review of US EPA National Priority, CERCLA, CERCLIS, RCRIS, and Superfund Site locations in Manatee County.

- A review of the US EPA Radon Map.

- A review of the FDEP Deep Well Injection Map.

- A review of the Phase I Environmental Site Assessment for the Taylor Concrete Parcel, prepared by Enviro-Audit & Compliance, Inc. (EAC) in September 2003 for Nathan J. Taylor, Jr.

- The collection and analysis of soil and ground water samples from soil borings strategically located on the subject site to evaluate the potential sources of subsurface contamination with respect to the identified RECs.

1.3 Significant Assumptions

The subject site has been used for a variety of purposes by various property owners throughout its history. Currently, the site is being used for light commercial (Mexican Flea Market) and industrial (Taylor Concrete) purposes. Historically, the site has been known to contain both above ground and underground storage tanks. Additionally, a set of railroad tracks trending northeast to southwest had once traversed the site. These railroad tracks have since been removed; however limited information is available regarding their removal.

1.4 Limitations and Exceptions

Limitations in data and resources were encountered during the preparation of this report. Some of the limiting factors included:

- No conclusive ground water flow data for the entire site and immediate surrounding area.

- Inability to interview all property owners.

- A 50-year chain of title review was not performed.

- Zip codes and/or street names were inconsistent in the Polk and Hill-Donnelly City Directories.

- The earliest aerial photograph available for the site was 1960.
- Portions of the Taylor and Mayr properties were heavily vegetated and not easily accessible.
- Buildings on Creel Property were not available for access.

Due to the fact that some sources were not available, they were not reviewed as part of this assessment. Conclusions were based on practically reviewable information available within reasonable time and cost constraints. There is always the possibility that potential sources of contamination have escaped detection due to the limited nature of this study, the inaccuracy of governmental records, or the presence of undetected and unreported environmental accidents.

1.5 Special Terms and Conditions

There were no special terms and/or conditions imposed by the client or the owners of the subject property which would affect the scope of this investigation or the corresponding results.

1.6 User Reliance

This report is provided for the sole use of Wal★Mart Stores East, Inc., its successors or assignees, subject to the original constraints and conditions of Kimley-Horn's scope of work and original contract. Use of this report by any third parties will be at the party's sole risk and Kimley-Horn disclaims any liability for such uses or reliance by third parties.

2.0 SITE DESCRIPTION AND HISTORY

The subject site is an irregular-shaped tract of land located at the northeast corner of U.S. Highway 301 (10th Street East) and US Highway 41 in the city of Palmetto (**Figure 1**). The following is a description of the Site and the surrounding properties.

2.1 Property Description

The Site consists of six parcels owned by three different individuals, Creel, Mayr and Taylor (**Figure 2**). Haskos Road, owned by Manatee County, will be improved for use as an access point, but will not be purchased by Wal★Mart. Therefore, it is not included in this report. A brief description of the individual properties is presented in the following sections. Legal descriptions and documentation for each of the parcels, which were obtained from the Manatee County Property Appraiser's web site (www.manateepao.com), are presented in **Appendix A**.

2.1.1 Creel Property

Three of the parcels which make up the Site are reportedly owned my Jeannette M. Creel. These three parcels total 13.78-acres. They include parcels 2601200004, 2601200005 and 2601200006. The legal descriptions for these parcels are as follows:

510 10th Street E (Parcel 2601200004):
THAT PART OF SW1/4 OF SE1/4 OF NW1/4 & WLY 132.0 FT OF SE1/4 OF SE1/4 OF NW1/4; LY E OF E LN OF S A L RR & N OF N R/W OF H/W 301, LESS; COM AT SW COR OF SE1/4 OF SE1/4 OF NW1/4 ; ELY ALG S1/4 LN OF NW1/4 A DIST OF 132.0 FT; NLY & PARALLEL TO E LN OF SW1/4 OF SE1/4 OF NW1/4 A DIST OF 93.23 FT TO NLY R/W OF H/W 301 FOR POB; WLY ALG SD R/W, HAVING A 0 DEG 30 MIN CURVE TO RIGHT, 347.0 FT; NLY & PARALLEL TO E LN OF SW1/4 OF SE1/4 OF NW1/4 222.68 FT; ELY 347.0 FT TO PT 225.0 FT NLY OF POB; SLY 225.0 FT TO POB LESS RD RIGHTS OF WAY DESC ORB 249 P 407, PUB REC MAN CO, FLA P-43 PI#25999.0000/4

508 10th Street E (Parcel 2601200005):
ALL THAT PART W OF S A L RR R/W OF SW1/4 OF SE1/4 OF NW1/4 LESS RD R/W, AS DESC IN DB 319 P 431; ALSO LESS THAT PROPERTY DESC IN A METES & BOUNDS DESC SET FORTH IN ORDER OF TAKING, CASE #4452 IN THE CIRCUIT COURT OF THE 12TH JUDICIAL CIRCUIT, WHICH ORDER WAS IN FAVOR OF THE ST RD DEPT; TOGETHER WITH A SEGMENT OF SCL RR 40 FT WIDE R/W; SD PARCEL OF R/W BEG AT N LINE OF US HWY 301 &

EXTENDING NORTHEASTWARDLY APPROX 650 FT TO N LINE OF SW1/4 OF SE1/4 OF NW1/4 SEC 13, CONTAINING .6 AC M/L, BEING SHOWN ON PRINT OF A PORTION OF GRANTOR'S R/W & TRACK MAP V.2-FLA/L-24/11 DESC IN OR 1004 P 3370 PRMCF PI#26012.0000/5

No assigned address (Parcel 2601200006):
ALL THAT PART OF SW1/4 OF NW1/4 S OF RR LESS H/W R/W & LESS LAND AS DESC IN ORB 417 P 301 & BEING FURTHER DESC IN ORB 601 P 212 PRMCF P-39 PI#25917.0000/6

Collectively, the three parcels constitute the Creel Property. At the time of the Phase I investigation two of the parcels (2601200004 and 2601200005) were occupied by the Mexican Flea Market. The Mexican Flea Market consisted of several free-standing wooden structures and buildings. Additionally, two septic tanks were found to service the flea market.

Parcel 2601200006 is situated between U.S. Highway 41 and the Taylor Property. At the time of the Phase I investigation the parcel was vacant and covered with vegetation. The parcel was reportedly used to stockpile fill material during the construction of the US 41 interchange.

2.1.2 Mayr Property

Friedrich Mayr is the owner of one of the parcels that is included in the Site. The legal description for this 8.69-acre parcel is as follows:

No assigned address (Parcel 2599610157):
ALL THAT PART OF THE N 1/2 OF SE1/4 OF NW1/4 LYING S OF SEABOARD AIRLINES RAILROAD R/W AS DESC IN OR 1278 P 2116 PRMCF PI#25996.1015/7

The Mayr property is situated north of the Creel Property and east of the Taylor Property. During the investigation the Mayr Property was vacant and was covered by heavy vegetation that limited access to the entire site. Several large debris piles were identified throughout the property.

During the Phase II investigation access to the site was facilitated by the pathways cut into and through the dense vegetation by Wal★Mart's geotechnical subcontractor.

2.1.3 Taylor Property

Two of the parcels (2599610009 and 2599600059) that constitute this Site are owned by Nathan J. Taylor Jr. These two parcels total

approximately 7.53-acres. The legal descriptions for the parcels owned by Mr. Taylor are as follows:

503 and 505 10th Street E (Parcel 2599610009):
THAT PART OF THE N 1/2 OF SE 1/4 OF NW 1/4 OF SEC 13, LY N & W OF SAL RR R/W & S OF ACL RR R/W, ALSO EASMT AS DESC IN ORB 422 P 113, ALSO EASMT AS DESC IN OR 1046 P 1601 PRMCF P-41-3 PI#25996.1000/9

No assigned address (Parcel 2599600059):
UNUSED RR R/W NEAR PALMETTO JUNCTION BEING 40 FT WIDE LOCATED IN SE1/4 OF NW1/4 OF SEC 13-34-17, VICINITY OF MP SW-870.17 (VAL STA 2230.83 TO VAL STA 2250.90) CONTAINING 1.84 AC M/L, & BEING SHOWN AS PCLS 44 & 45 (V2FLA/L-24/11 CARD P-12); LESS .60 AC M/L AS DESC IN OR 1004 P 3370 PRMCF PI#25996.0005/9

The Taylor Property is situated in the northwestern corner of the site. The property consists of four buildings or structures formerly or currently used for light industrial purposes.

2.2 Environmental Setting

The following sections summarize the environmental setting for the subject site. This includes discussion on the site's the physiographic setting, topography and geologic/hydrogeologic setting.

2.2.1 Physiographic Region

The subject site is situated in central western Manatee County, along the Gulf Coast of the Florida peninsula. According to the *Soil Survey of Manatee County, Florida* (USDA/SCS, 1983), Manatee County is located on the Coastal Lowlands of Florida. The Coastal Lowlands are made up of nearly level plains that have recently emerged from the sea such that large areas have undergone little or no dissection. There are four marine terraces located throughout the county at about 100 (Wicomico), 70 (Penhaloway), 42 (Talbot), and 25 (Pamlico) feet above present sea level.

2.2.2 Site Elevation and Topography

The site topography is essentially flat. A review of the United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle (1987) for Palmetto, FL indicated that elevations across the site vary between 8 and 10 feet NGVD (***Figure 3***).

2.2.3 Surface Sediments

The 1983 U.S. Department of Agriculture (USDA)/Soil Conservation Service Soil (SCS) *Soil Survey of Manatee County, Florida* maps the following soil types on the subject site: Bradenton fine sand, limestone substratum; Chobee loamy fine sand; EauGallie fine sand, and Wabasso fine sand (***Figure 4***). A summary of the soil descriptions, from the SCS Soil Survey, are included below:

Bradenton fine sand, limestone substratum – This is a nearly level, poorly drained soil that occurs on low-lying ridges and hammocks. The surface layer is very dark gray fine sand 6 inches thick. The subsurface layer in the upper part is grayish brown fine sand 11 inches thick and the lower part is brown fine sand 2 inches thick. If this Bradenton soil is not drained, the water table reportedly occurs within 10 inches of the surface for 2 to 6 months and at a depth of 10 to 40 inches for much of the year. In the dry seasons, the water table may recede to a depth of 40 inches, or more. Permeability is rapid in the surface and subsurface layers and moderate in the subsoil.

Chobee laomy fine sand – This soil horizon reportedly occurs within large depressions; poorly defined drainage ways and broad, low flats. The soil is reportedly poorly drained. Slopes are smooth to concave and range from 0 – 2 percent. Typically, the water table occurs above the surface or within a depth of 10 inches for 6 to 9 months or more out of the year. It is at a depth of 10 to 30 inches for short periods during dry seasons. Permeability is moderately rapid in the surface layer and slow or very slow in the subsoil and substratum.

EauGallie fine sand – This is a nearly level, poorly drained soil that occurs in broad areas of flatwoods. Slopes are smooth and range from 0 to 2 percent. Typically, the water table occurs at a depth of less than 10 inches for 2 to 4 months out of the year, during wet seasons, and within a depth of 40 inches for more than 6 months. Permeability is rapid in the surface and subsurface layers and moderate to moderately rapid in the subsoil and substratum.

Wabasso fine sand – This is a nearly level, poorly drained soil that occurs in areas of broad flatwoods. Slopes are less than 2 percent. Typically, if this soil is not drained, the water table occurs at a depth of 10 to 40 inches for more than 6 months out of the year. During the wet season, the water table has been

known to occur at a depth of less than 10 inches. Water table depths of greater than 40 inches may occur during very dry seasons. Permeability is rapid in the sandy surface and subsurface layers, slow to very slow in the loamy layers and very rapid in the substratum.

The occurrence of hydric soils is one characteristic used to define wetlands. According to the *Hydric Soils of Florida Handbook* (Florida Association of Environmental Soil Scientists, 2001), Bradenton, EauGallie and Wabasso fine sands are generally not considered hydric. Chobee loamy fine sand is generally considered hydric. Incidentally, Chobee loamy fine sand reportedly occurs within the heavily vegetated portions of the site ***(Figure 4)***.

2.2.4 Hydrogeologic Conditions

There are three significant aquifer systems within Manatee County, Florida. These include the Surficial Aquifer, Intermediate Aquifer, and the Floridan Aquifer systems.

The Surficial Aquifer system generally includes the near-surface unconsolidated materials. The Surficial Aquifer system is principally used for domestic, commercial, and small municipal water supplies. It consists mostly of unconsolidated sand, shelly sand, and shell. Groundwater in the Surficial Aquifer system is generally under unconfined (water-table) conditions. As such, it is the principal aquifer of concern due to its vulnerability to contamination.

The Intermediate Aquifer System is located between the Surficial Aquifer System and the Floridan Aquifer System and is typically bound above and below by clayey confining units. Because the system is not exposed at land surface, it is recharged primarily by downward leakage from the Surficial Aquifer and upward leakage from the Floridan Aquifer. Sand beds and limestone lenses constitute the permeable units of the system. In Manatee County, the Intermediate Aquifer System is the primary source for domestic supplies.

The Floridan Aquifer system is a large, productive, artesian aquifer covering approximately 100,000 square miles in southeastern Georgia, southern South Carolina, and all of Florida. It is separated from the Intermediate and Surficial Aquifer systems by a clayey confining unit (Hawthorn Formation). In Florida, the upper portion of the aquifer is widely used for water supply in the north and central portions of the state. The Floridan is extensively used for industrial and irrigation water supplies throughout the rest of the State.

Limited information was available regarding the localized direction of ground water flow across the site. However, according to a January 1991 Contamination Assessment Report prepared by Enviro-Audit & Compliance, Inc. for the Superior Products Company (Taylor property), the localized direction of ground water flow in the surficial aquifer was reportedly to the southeast.

2.2.5 Surface Water Bodies

Several manmade drainage ditches, including the Palmetto Eastern Canal, and one pond were observed on site (***Figure 1***). According to a review of the historic aerial photographs, the pond was constructed in an area of cleared and maintained uplands between 1975 and 1980. The drainage ditches convey water off-site to the south. No connection between the pond and the ditches was observed in the aerial photographs or during the site reconnaissance. The Palmetto Eastern Canal extends northeast of the site, southward along the eastern boundary of the site. Surface water flowing southward passes through a junk yard and an area of light industrial use before reaching the subject site.

The prominent drainage feature associated with the former railroad bed, which traversed the site, flows into the Palmetto Eastern Canal at the northeastern corner of the site.

During the Phase I reconnaissance, an oily sheen was observed on the Palmetto Eastern Canal in the culvert under the railroad tracks at the northeast corner of the subject site. This oily sheen was considered a REC.

The Manatee River is located approximately 0.8 mile south of the subject site. Terra Ceia Bay is located approximately 2.1 miles west of the subject site.

2.3 Current Site Use

Currently, the site is used for commercial and light industrial activities by Taylor Concrete and the Mexican Flea Market. Taylor Concrete installs and repairs septic tanks. At one time, concrete septic tanks were manufactured on-site. Currently, the tanks are manufactured off-site; however the finished tanks are stored on-site until they are needed. The Mexican Flea Market occupies a portion of the Creel Property and consists of several free-standing structures used for the sale of miscellaneous commercial products.

The remainder the site is vacant with significant vegetation in some locations. There was dense vegetation across 90% of the Mayr Property. Additionally, several debris piles were located throughout the Mayr Property. At the time of

the site reconnaissance it was unclear whether the Mayr Property was actively being used for dumping.

2.4 Site History

The following sections provide a summary of the site history based upon a review of readily available information and documentation.

2.4.1 Historical Aerial Photograph Review

In order to ascertain the previous land uses on the site, a review of the available historical aerial photographs was conducted. A series of photographs dated 1960, 1965, 1973, 1975, 1980, 1984, 1987, 1991, 1994, and 1999 were obtained from the Manatee County Property Appraisers Office. A photograph dated 2001 was obtained from Engineering Mapping Solutions, Inc. The photographs were examined for past physical conditions and other features on the subject site and adjacent areas that might be considered a REC. The 1960 aerial photo was the earliest photograph reviewed, and the 2001 aerial was the most recent available.

A summary of observations of each photograph is presented in ***Table 1***. Below is a listing of the identified RECs based upon the review of the historical aerial photographs:

- The surrounding area was primarily used for agricultural purposes (citrus) prior to 1980.

- Railroad tracks traversing the Site are visible in the 1960 aerial photograph. In addition, there have been working railroad tracks located adjacent to the northern boundary of the Site since at least 1960.

- An automobile junkyard is visible in the 1973 aerial photograph to the northeast of the Site. There is a creek that flows through this junkyard and connects with the Palmetto Eastern Canal.

- Taylor Property had used for industrial purposes since at least 1973. A majority of the past use of the Taylor Property appears to be associated with the fabrication of concrete septic tanks and similar concrete vessels.

- The Mayr Property was potentially used for agricultural purposes from at least 1960 to 1980. Around 1980, the Mayr Property appeared to be used in conjunction with a plant nursery; which

was located on a contiguous property to the south, also owned by Mr. Mayr. Recent aerial photographs suggest that the Mayr property may have been used for solid waste and debris disposal.

- Recent aerial photographs indicate that the unpaved portions of the Creel Property have been used for truck parking. Additionally, debris piles were identified on the property.

- An auto body shop (Lex's Automotive Repair) was identified south of Mayr Property on Haskos Road.

2.4.2 City Directory Review

Both the Polk and the Hill-Donnelly City Directories, available at the Manatee County Library, were reviewed for the Site. Beginning in 2003 and working backward, the directories were reviewed in approximately 5 year segments for 50 years. The addresses for the Site and immediately adjacent property were not found in most years, and 1969 was the last year the adjacent roadways were listed.

A summary of directory listings is presented in ***Table 2***. The Taylor Property was first listed in 1975 as Gene's Diesel Service and New Moon Toilets. Other facilities located on the Taylor Property have been Paul D. Smith Masonry, Superior Products, Pacific Packing Co., Ausborn Steel Co., and Taylor Concrete. These listings represent RECs and are consistent with the aerial photographs. The Creel property was reportedly used as the location for a fair. Facilities adjacent to the subject site that represent RECs include the following: Woods Texaco Services [a.k.a. Darrell Texaco (auto repair)], Palmetto Plant Co., Haskos Nursery, Southern Country Auto Parts, Vickers Trucking, and Carl's Used Auto Parts.

2.4.3 Phase I Environmental Site Assessment – N.J. Taylor Jr. Property

Nathan J. Taylor Jr. retained the services of Enviro-Audit & Compliance, Inc. (EAC) to perform a Phase I Environmental Site Assessment for the Taylor Property in September 2003. Several environmental liabilities were identified on the subject site by EAC; including the existing aboveground storage tanks and a xylene release that occurred at the Superior Products Co. facility. However, EAC did not classify any of the identified environmental liabilities as RECs. EAC concluded that the "assessment has revealed no evidence of recognized environmental conditions in connection with the subject property."

2.4.5 ASTM Transactional Screening Process – Country Fair Flea Market Property

In August 2003, Jeanette M. Creel retained the services of EAC to conduct an ASTM Transactional Screening Process for the Country Fair Flea Market Property (Mexican Flea Market). The purpose of the screening was to quantify the current environmental conditions present at the site. EAC concluded that no evidence of recognized environmental conditions were present on the subject property.

3.0 ENVIRONMENTAL BUSINESS RISK CONSIDERATIONS

As part of the Phase I ESA, environmental business risks on the subject site were evaluated as a deviation from the standard procedures set forth in ASTM Standard Practice E 1527-00. The evaluation of environmental business risks included assessing the likelihood of the presence of asbestos containing materials, radon, lead-based paint, lead in drinking water, wetlands, cultural and historical resources, archaeological resources, ecological resources, threatened and endangered species and high voltage power lines. Results of the business environmental risk investigation are summarized in ***Table 3***.

In addition to this combined Phase I and Phase II ESA, Kimley-Horn has prepared a separate Natural Resource Assessment. The purpose of the Natural Resource Assessment was to identify potential development constraints on the property, relative to our assessment of the vegetative communities, wildlife, wetlands, potential listed species or listed species habitat, and historical and/or cultural resources on site.

The majority of the buildings on the site do not appear to have insulation (flea market booths on Creel Property; metal buildings on Taylor Property); however, there is a house on the Creel property that was constructed prior to 1960. In addition, the former Worthy Sandblasting and Taylor Concrete buildings have office space associated with them. Testing for asbestos, lead based paint and other potential hazardous construction materials in accordance with Wal★Mart protocol prior to demolition is recommended for all buildings on the subject site.

4.0 SITE RECONNAISSANCE

Lynn M. Young, environmental scientist, and Rachael Northcutt, project engineer with Kimley-Horn, conducted a field reconnaissance of the Site on September 15, 2003. No site contact or authorized agent for the client was on-site during the field reconnaissance. The Site was accessed from Haskos Road. The project area was visually surveyed using random pedestrian transects to observe key areas of interest. On September 22, 2003 Nathan Taylor, Jr., property owner, and Elizabeth Andrews, Project Manager with Enviro-Audit & Compliance, Inc., accompanied Mrs. Young during site reconnaissance of the Taylor Property. The purpose of the site visit was to identify and document obvious signs of RECs. During the boundary survey initiated on November 3, 2003, surveyors discovered several aboveground tanks located in an area of dense vegetation on the Taylor Property. As a result, Lynn Young revisited the site on November 4, 2003 to view the tanks. The findings of the site reconnaissance are presented in ***Table 3***. Photographs taken during the site reconnaissance are presented in ***Appendix B***. The approximate locations of the RECs identified during the site reconnaissance are shown on ***Figure 5***.

4.1 Creel Property

This property is currently used as a flea market and contains no pavement or similar impervious surfaces. Buildings present include numerous wooden booths and an old, two-story wooden house containing public restrooms. The house has a window air conditioning unit, and several other buildings have fans in the roofs.

The buildings located on the Creel Property are serviced by at least two septic tanks.

4.2 Mayr Property

This property is overgrown with exotic and nuisance vegetation. Because of the dense vegetation, access to the entire site was limited. There is a stormwater pond located on the northeast corner of the property and the Palmetto Eastern Canal is coincident with the eastern property boundary (***Appendix B***). A ditch extends southwest from the Palmetto Eastern Canal through the Mayr property to a dirt road behind the flea market. Centrally located on the southern property boundary is an area containing numerous bee hives. Construction debris such as broken concrete pipe is scattered throughout the property. There are also several piles of railroad ties on the property near the ditch and former railroad track area. Several piles of miscellaneous debris were observed throughout the property, which are indicative of historical dumping practices. As such, the debris piles are considered to be RECs. Heavy vegetation limited the ability to assess the site

in its entirety.

There is a small area of citrus trees located at the southeastern corner of the property. This area represents a REC due to the past use and presence of debris.

4.3 Taylor Property

Nathan Taylor, Jr., property owner, and Elizabeth Andrews, Project Manager with Enviro-Audit & Compliance, Inc., accompanied Mrs. Young during the September 15, 2003 site reconnaissance of this property. The property was found contained three buildings, a concrete storage building, and a steel frame building and can be subdivided into four areas: Taylor Concrete area, former Worthy Sandblasting tenant building, former Superior Products Co. tenant area, and former Gene's Diesel Service tenant area.

According to Mr. Taylor, former occupants of his property included Gene's Diesel Repair, Paul Smith Masonry, Worthy Sandblasting, Joelson Concrete, Hanson Concrete, Superior Products Co., and West Coast Structures.

There are two potable wells on-site. Three of the buildings have indoor utilities and are each on private septic systems. The wells and septic systems represent RECs.

Located on the southwest corner of the Taylor Property is a building occupied by Taylor Concrete, a septic tank installation and removal business. The building is a metal structure with a concrete floor. There is a small office space inside the building. The office has a drop ceiling with acoustic ceiling tiles, a small lavatory, linoleum flooring, paneling on the walls, and a small window-unit air conditioner. The remainder of the area is used for the storage of materials and vehicles. According to Mr. Taylor, the site was formerly used to construct septic tanks. However, Taylor Concrete currently purchases the septic tanks ready made.

There are two 500 gallon above ground storage tanks (ASTs) in the proximity of this building (***Appendix B***). One tank contains vehicular diesel fuel and one contains non-vehicular diesel fuel. The tanks are secondarily contained on cement pads. Nevertheless, the ASTs represent a REC. According to a database report prepared by Environmental FirstSearch (FirstSearch), there were two ASTs previously located in the vicinity of the two existing tanks. One of the tanks contained 1,000 gallons of unleaded gasoline and one contained 750 gallons of vehicular diesel. According to the record search, the tanks were removed in September of 1999. The Manatee County Environmental Health Department files documented that there were some compliance issues regarding the lack of impervious containment. The former tanks represent a REC. The last inspection was in 1999. According to EAC's Phase I ESA, Mr. Taylor stated that there had been one underground storage tank on-site. This tank was reportedly

installed in the 1970's, and Mr. Taylor stated that he removed the tank in 1989 prior to the advent of regulatory closure and upgrade requirements. He replaced this tank with the 1,000 and 500 gallon tanks (750 gallons per FirstSearch report) mentioned in the FirstSearch report.

Two metal, 55-gallon drums containing waste oil were observed outside of the Taylor Concrete building near the well pump. According to Mr. Taylor, maintenance is typically not performed on the vehicles on the property; however he does store vehicular oil and hydraulic fluid in this building. Mr. Taylor stated that his business generally generates 1 to 2 drums of waste oil a year. The waste oil is reportedly disposed at an off-site location approximately twice a year.

The ground outside of the building is not paved. Debris such as old tires, black plastic tubing, and metal is stored in one side of the metal building (***Appendix B***). Immediately east of the building is another large trash pile containing dead trees, metal, PVC pipes, and wood. According to EAC's Phase I ESA, known chemicals previously stored on the site include form release oil (from previous pre-cast concrete operations); xylene (Superior Products Co.); motor oil, waste oil and hydraulic fluids (from previous pre-cast concrete operations, Gene's Diesel Repair, and Taylor Concrete); and waste antifreeze (from Gene's Diesel Repair). The past use and storage of these items is considered a REC.

Worthy Sandblasting formerly occupied a large building in the rear of the property (north end). The building contains a relatively new office space, several bays for vehicles and is surrounded by a 10-foot high chain link fence. The building is on a cement pad, and there is a cement pad in front of the bays. Some staining of the pavement was observed in the bays. The fenced area is used by Taylor Concrete for the storage of vehicles, trucks and equipment. Forklifts and trailers were observed parked on both the concrete and grass behind the building. The former sandblasting facility is considered a REC.

The yard adjacent to the east of the former Worthy Sandblasting building is covered by road base material but also contains several concrete pads, a concrete outbuilding, and a steel hangar (***Appendix B***). This is the area that was formerly leased to Superior Products Co. and others. The historical aerial photographs indicated that this area was also used to store concrete structures (pipe). Several working semi-tractor trailers were observed parked in this area. Mr. Taylor stated that he occasionally allows business associates and/or friends to park there. Two trailers, one immobile and one on wheels, were also observed in this area. They appeared to contain scrap metal and household furniture. There is a concrete outbuilding located near the north property boundary. The building was locked, and entry was not provided. Mr. Taylor stated that to the best of his knowledge, no hazardous chemicals or petroleum products were stored in this building. According to the surveyors, who obtained access to the building, it contains numerous metal tools, pump chemical sprayers, and about a gallon of MEK (methyl-ethyl ketone) – an industrial cleaner. The Superior Products area

is considered a REC.

Two monitoring wells were observed in this area of the site. One was located on the former railroad property, adjacent to a ditch, and the other was near the cement pads. These monitoring wells were part of the environmental assessment/remediation performed by EAC on behalf of Superior Products Co. Agency files on this cleanup were not found, however, information was obtained in EAC's Phase I ESA for the Taylor Concrete Property. According to that report, the FDEP's Industrial Wastewater Compliance section supervised the clean up activity for the Superior Products Co. lease area. According to EAC's Phase I ESA, there were originally seven (7) monitoring wells on the property. Superior Products Co. reported a xylene discharge in 1990. Xylene was used in the pre-cast concrete painting operation. A Contamination Assessment Report (CAR) prepared by EAC in January 1991 identified soil and groundwater contamination in a small area along the eastern boundary of the Taylor Property. Approximately 214 tons of xylene impacted soils were removed on March 8, 1990. A notice of No Further Action (NFA) was issued by the FDEP in June 1993 due to levels of xylene in the groundwater below state cleanup standards.

FirstSearch reported one 1,000 gallon AST registered to Superior Products Co. This tank reportedly contained vehicular diesel fuel. It was installed in June 1987 and removed in March 1990. According to the Manatee County Environmental Health Department files, minor contamination was discovered around the pipes and the site was subsequently cleaned up by EAC for Superior Products, Co.

During the boundary survey, surveyors observed a 500-gallon plastic tank located along the northern property boundary near the railroad tracks (***Appendix B***). This tank, which was observed to be empty, was not labeled. A similar tank was located on the former Superior Products tenant area. The tank was not labeled and contained a small amount of liquid. The surveyors also observed a 750 to 1,000 gallon rusted metal tank located in the northeast corner of the Taylor Property near the former railroad tracks (***Appendix B***). This tank was not labeled and appeared empty. However, a gasoline odor was easily detected on the western side of the tank. These storage tanks represent RECs relative to the subject site.

A steel building surrounded by concrete and a chain-link fence occupied the northwest corner of the Taylor Property. Gene's Diesel Repair occupied this building for the past 25 years. The tenant vacated the building in September 2003. The cement both inside and outside of the building was stained black (***Appendix B***). Inside in the southeast corner of the building was a waste oil tank. There was dry absorbent material scattered on the floor in front of the tank. There is a small office in the southwest corner of the building. The makeshift walls of the office were constructed of plywood. According to Mr. Taylor, there had recently been a release of regulated substances on the property. According

EAC's Phase I ESA, a compliance inspection performed in October of 1989 revealed the improper storage and disposal of solid and hazardous waste. The contaminated area was excavated and covered with an impervious surface.

Although Gene's Diesel Repair service is no longer a tenant on the property, this facility represents a REC to the subject site. The former tenant had a history of poor housekeeping and the facility has no records of testing or inspections since at least 1990.

Kimley-Horn recommends that each of the buildings be tested for asbestos, lead based paint and other potential hazardous construction materials in accordance with Wal★Mart protocol prior to demolition.

There are several pole mounted transformers on the site. No evidence of leakage was observed or reported. Proper disposal of these transformers during demolition is recommended.

4.4 Adjacent Properties

A visual reconnaissance of the area within a 0.25-mile radius of the subject site was conducted to identify facilities and operations known or suspected of storing petroleum products, using other regulated materials or generating hazardous wastes. Additionally, a database search of the site and properties within a 1.0-mile radius was performed by Environmental FirstSearch. The FirstSearch report included a search of the NPL, CERCLIS, RCRA, UST, LUST, ERNS, FINDS, NPDES, TRIS, and other State and federal databases tracking toxic waste storage, handling, and disposal sites, dry cleaning sites, and contamination-sites. A copy of the FirstSearch report is attached in ***Appendix C.*** The EPA's Envirofacts database located on the EPA's web site was also used to identify regulated facilities on the site and in the zip code. A copy of the EnviroFacts information is included in ***Appendix D.*** A summary of the record review conducted for the site is included in ***Table 5***. The approximate location of the RECs identified are shown on ***Figure 5***.

4.4.1 RCRA Facilities

The radius search conducted by FirstSearch identified six (6) RCRA generators within 0.5 mile of the subject site. Four of these facilities have been identified as RECs:

- FPL Manatee Service Center – This is a small quantity generator located immediately adjacent to the eastern side of the site. This facility is listed for general automotive repair. Stormwater runoff from this site outfalls into the Palmetto Eastern Canal located in between the facility and the subject site (***Appendix B***).

- Gene's Truck Service – A small quantity generator formerly located on the subject site.

- Ringling Brothers Train Recycling – A small quantity generator located northeast of the subject site.

- Lex's Automotive – Located immediately south of the Mayr property, this facility performs general automotive repair and is reportedly a small quantity generator. There is concrete under the service building, but the remainder of the site is unpaved. Numerous vehicles were observed parked in the grassed areas adjacent to the subject site.

4.4.2 UST/LUST

The FirstSearch report and site reconnaissance indicate that there are seven (7) AST or UST facilities within 0.5 mile of the subject site. Six of them have been identified as having a leaking underground storage tank (LUST). The facilities that represent RECs relative to the subject site are:

- Superior Products, Co. – located on the subject site.
  Please refer to Section 4.3 of this report for further discussion on this site.

- Taylor Concrete, Inc. – located on the subject site.
  Please refer to Section 4.3 of this report for further discussion on this site.

- Texaco #24-203-0087 Harvey Woods – located approximately 0.1 mile south of the subject site across U.S. 301. This facility reported a discharge of regulated substances in 1987. Contaminated soil has reportedly been removed. The facility was not observed during site reconnaissance.

- FPL Manatee Service Center – located approximately 0.01 mile east of site. There was a discharge of regulated substances from this facility reported in December 1994. It was cleaned up and the FDEP issued an NFA for the site in 2001. Reportedly, the localized direction of ground water flow on this site was to the west/northwest, and stormwater runoff from this facility appeared to discharge directly to the Palmetto Eastern Canal. Because of the historical release and its close proximity to the site, this facility represents a REC relative to the subject site.

5.0 PHASE II ENVIRONMENTAL SITE ASSESSMENT

At the conclusion of the Phase I assessment activities, Kimley-Horn recommended the completion of a Phase II Environmental Site Assessment. The purpose of the Phase II ESA was to further evaluate the identified RECs through the collection of soil and ground water samples from the site.

On December 15, 16 and 17, 2003, Kimley-Horn conducted a subsurface investigation at the subject site: The Kimley-Horn personnel participating in this investigation included: David Goldman, Troy Mayhew and Jason C. Sheasley. Photographic documentation of the Phase II activities is included in **Appendix B**. The following is a summary of the Phase II Environmental Site Assessment Activities.

5.1 Soil Boring Location

Direct-push technology (DPT) was used to advance a total of 50 soil borings (GP-01 through GP-50) across the site to facilitate the collection of representative soil and ground water samples (**Figure 6**). The soil borings were located to evaluate the potential for subsurface contamination with respect to the identified RECs. The following is a brief summary of the soil boring locations with respect to the corresponding RECs.

- Soil borings GP-01 through GP-04 and GP-50 were installed around the Taylor Concrete facility. This facility reportedly contained both aboveground and underground storage tanks.
- GP-05 through GP-08 were placed around the building which was once utilized by Gene's Diesel Service.
- Soil borings GP-09 through GP-12 were placed around the building formerly occupied by Worthy Sandblasting.
- Soil borings GP-13 through GP-16 were placed around the location of the Superior Products Co. xylene release.
- During the clearing of the Mayr property by Wal★Mart's geotechnical subcontractor, a 55-gallon drum was punctured resulting in the release of an unknown quantity of an oil-like substance to the ground. The subcontractor reportedly contained the spill then excavated and containerized the impacted soil. The impacted soil was placed in two 55-gallon drums. Soil boring GP-17 was advanced within the area of the reported release.

- GP-18, GP-20 and GP-47 were placed adjacent to the various empty storage tanks located on the northeastern portion of the site.
- GP-19 was placed adjacent to the steel structure formerly utilized by Superior Products Co.
- Soil borings GP-21, GP-22 and GP-36 were advanced in the former railroad bed.
- Soil boring GP-23, GP-24, GP-25 and GP-35 were advanced along the southern portion of the Mayr property.
- GP-26, GP-27 and GP-28 were advanced around the largest debris pile situated on the Mayr property.
- Soil boring GP-29 was placed adjacent to a debris pile located along the southern portion of the Mayr property.
- Soil borings GP-30 through GP-34 and GP-49 were advances along the eastern portion of the Mayr property. More specifically, soil borings GP-32, GP-33 and GP-34 were advanced adjacent to the Palmetto Eastern Canal. GP-34, the southern-most boring, was also situated adjacent to the former site of Haskos Nursery.
- GP-37, GP-38 and GP-48 were installed along the western portion of the Creel property.
- Soil borings GP-39 through GP-44 were installed at various locations within the Mexican Flea Market on the Creel property. Specifically, GP-39 was installed adjacent to the Lex's Automotive facility. Soil borings GP-41 and GP-42 were installed adjacent to two septic tanks which serviced two the buildings which constitute the Mexican Flea Market.
- Soil borings GP-45 and GP-46 were advanced around two debris piles situated on the Taylor property.

The soil and/or ground water samples collected from each soil boring were analyzed for specific compounds relative to the identified RECs. A summary of the soil and ground water sampling matrix is presented in **Table 6**.

5.2 Soil Sampling

Soil samples were collected from each of the soil borings from 0 to 2 feet below

ground surface (bgs). The soil borings were advanced into the subsurface using a 4-foot long, 2-inch diameter macro core sampler by means of a Geoprobe DPT rig. With the exception of the samples collected volatile organic compound (VOC) analysis, the soil samples from each soil boring were composited across the length of the boring (0 to 2 feet, bgs) for analysis by the laboratory. Because FDEP SOPs do not allow for the field compositing of soil samples for volatile organic compound (VOC) analysis, two boreholes were advanced side-by-side at each soil boring location. The corresponding soil cores were collected in dedicated acetate liners. One dedicated soil core was opened for the purposes of recording the lithology and collecting the corresponding VOC sample. The second dedicated soil core was capped, sealed and shipped to the laboratory to be composited for analysis.

Following the collection of soil samples, the corresponding boreholes were backfilled and abandoned. At the locations were the boreholes were advanced through impervious surfaces (asphalt or concrete), an attempt was made to restore the surface to its original condition using either a concrete or asphalt patch.

5.3 Ground Water Sampling

Shallow ground water samples were collected from 16 of the 50 soil borings advanced across the site. To facilitate the collection of representative ground water samples, temporary monitoring wells were installed at each of the 16 soil boring locations. The temporary monitoring wells were constructed of one-inch diameter PVC well casing with a five-foot long pre-packed well screen.

After installation, the temporary monitoring wells were purged using low-flow techniques to facilitate the collection of representative ground water samples. Throughout the purging process, temperature, pH, specific conductivity and turbidity values were measured and recorded. The corresponding ground water sampling logs are presented in **Appendix E**.

In addition to the ground water samples collected from the soil borings, ground water samples were collected from the two potable wells located on the Taylor Property. One well was located at the active Taylor Concrete facility (Taylor Concrete Well); the second well was located at the former Superior Products site (Taylor Superior Well). Both of the wells contain submersible pumps. Prior to sampling, the wells were purged for approximately 30 minutes to facilitate the collection of representative ground water samples.

During the investigation, ground water in the Surficial Aquifer generally occurred at less than five-feet below ground surface (bgs).

6.2 Ground Water Analytical Results

Sixteen ground water samples were collected for analysis from the fifty soil borings advanced across the site (**Table 6**). Additionally, ground water samples were collected from the two potable wells located on the Taylor property. A summary of the corresponding ground water quality data is presented in the following sections. In the following sections the ground water analytical results have been evaluated relative to the Chapter 62-777 Florida Administrative Code Ground Water Cleanup Target Levels (GCTL).

6.2.1 Volatile Organic Compounds in Ground Water

Thirteen of the sixteen ground water samples were analyzed for priority pollutant VOCs or BTEX compounds using USEPA Method 8260. With the exception of GP-01, none of the ground water samples were found to contain detectable concentrations of VOCs above the corresponding method detection limits. A trace concentration of ethylbenzene (4 ug/L) was identified below the corresponding GCTL in the ground water sample collected from GP-01 (**Table 10**).

The ground water samples from the two potable wells on the Taylor property were also analyzed for priority pollutant VOCs using USEPA Method 8260. Correspondingly, VOCs were not identified above the method detection limits in the two potable well samples.

6.2.2 Semi-Volatile Organic Compounds in Ground Water

Ten of the sixteen ground water samples collected from the site were analyzed for priority pollutant SVOCs using USEPA Method 8270. With the exceptions of GP-01 and GP-02, none of the ten ground water samples contained SVOCs above the corresponding method detection limits. Detectable concentrations of bis (2-ethylhexyl) phthalate were identified GP-01 (2.4 ug/L) and GP-02 (2.4 ug/L) slightly below the GCTL (**Table 11**). The ground water sample collected from GP-01 also contained detectable concentrations of 1-methylnaphthalene (0.41 ug/L), 2-methylnaphthalene (0.38 ug/L) and naphthalene (4.4 ug/L) below the corresponding GCTLs (**Table 11**).

The ground water samples collected from the two potable wells on the Taylor property were also analyzed for priority pollutant SVOCs. Semi-volatile organic compounds were not identified above the corresponding method detection limits in the two potable well samples.

6.2.3 Metals in Ground Water

Thirteen of the sixteen ground water samples collected from the soil borings advanced across the site were analyzed for the eight RCRA metals total and dissolved using USEPA Methods 6010 and 7470. One additional ground water sample (GP-34) was analyzed for nitrate using USEPA Method 4500. A summary of the detectable inorganic parameters is presented in **Table 12.**

Detectable concentrations of one of more of the eight RCRA metals were identified in each of the thirteen ground water samples. Exceedances of the GCTL were identified in the ground water samples collected from GP-01, GP-05 and GP-18. The results from the remaining ten ground water samples were below the corresponding GCTL.

Total lead was identified in the ground water sample collected from GP-01 (5-10') at a concentration of 0.04 mg/L which exceeds the corresponding GCTL (0.015 mg/L). Elevated concentrations of total barium (2.6 mg/L), total chromium (0.52 mg/L and total lead (0.14 mg/L) were identified above the corresponding GCTLs in the ground water sample collected from GP-05 (5-10'). The ground water sample collected GP-18 (7-12') contained total chromium (0.14 mg/L) above the GCTL.

Each of the ground water samples collected from GP-01, GP-05 and GP-18 had elevated turbidity values. Metals in ground water have an affinity for adhering to suspended sediments and colloids. As such, the sediment has a tendency to impart elevated total metals concentrations which are not indicative of the actual ground water quality. Therefore the elevated total metals concentrations identified in each of the three samples may be result of the sediment in the samples. To address this issue, the turbid ground water samples were filtered by the laboratory and analyzed for dissolved metals (**Table 13**). Based upon the dissolved metals results, it is apparent that the elevated concentrations of total metals identified in GP-01, GP-05 and GP-18 are false positives with one possible exception. The ground water sample collected from GP-05 contained dissolved lead (0.015 mg/L) at the GCTL.

6.2.4 Pesticides and Herbicides in Ground Water

Given its close proximity to the former Haskos Nursery site, the ground water sample collected from GP-34 (5-10') was analyzed for organochlorine pesticides (USEPA Method 8081), organophosphorus pesticides (USEPA Method 8141) and chlorinated herbicides (USEPA Method 8151). The corresponding ground water sample did not contain

detectable concentrations of pesticides or herbicides above the corresponding method detection limits.

7.0 CONCLUSIONS

Based upon the results of this combined Phase I and Phase II Environmental Site Assessment, Kimley-Horn presents the following conclusions regarding the environmental liabilities associated with the Wal★Mart Palmetto Site.

The analytical data suggests that area-wide arsenic contamination is present in the soil across the site. Detectable concentrations of arsenic were identified in 40 of the soil samples collected from the site (**Figure 7**). Elevated concentrations of arsenic, above either the residential or commercial SCTL, were identified in 29 soil samples. Eleven of the soil samples exceeded the Commercial SCTL and eighteen of the soil samples exceeded the residential SCTL. The arsenic present in the soil may be the result of natural and anthropogenic processes. The herbicides typically used for weed control along railroad tracks have been known to contain arsenic. As such the elevated concentrations of arsenic identified along existing and former railroad tracks may be the result of historical herbicide use. Portions of the Mayr Property have reportedly been used for agricultural purposes from the 1960s to the 1980s. The application of pesticides and herbicides on the Mayr Property may have contributed to the elevated arsenic concentrations identified in the soil. In addition to the anthropogenic sources, arsenic is major element of numerous minerals. It is naturally occurring throughout much of Florida. A portion of the contamination present at the site may be the result of naturally occurring arsenic.

The upper limit of the mean arsenic concentration with the 95% confidence level was calculated for the soil samples collected from the site using the software program ProUCL95 Version 2.1 (**Appendix G**). Statistical analyses were performed for the three properties (Mayr, Creel and Taylor) and the Site as a whole. The site-wide, nonparametric UCL 95 value for arsenic is 2.89 mg/Kg. This value exceeds the current Residential SCTL. Similarly, the nonparametric UCL 95 values for arsenic for the Mayr, Creel and Taylor properties are 3.81 mg/Kg, 4.38 mg/Kg and 4.07 mg/Kg respectively. These values exceed the Commercial SCTL. The SCTLs for arsenic are proposed to be increased by a factor of two to four by summer 2004. Based upon the proposed changes, the calculated arsenic UCL 95 for the entire site and the three individual properties will be above the Residential SCTL but below the Commercial SCTL.

Chromium was identified in the soil, above the Leachability SCTL, at three locations across the site. The chromium identified on the Taylor Property, may be the result of the railroad tracks which once traversed the site. The Chromium identified on the Mayr Property may be the result of the historical dumping which has occurred on the property. Despite the elevated chromium concentrations identified in the soil at three locations, no chromium ground water impacts were identified.

Elevated concentrations of total metals were identified in three ground water samples (GP-01, GP-05 and GP-18) collected from the site. Specifically, the elevated concentrations of metals in ground water were identified on the Taylor Property. Due to the elevated turbidity of each of the three ground water samples, the samples were filtered by the laboratory and analyzed for dissolved metals. The dissolved metals results indicated that the turbidity associated with the samples resulted in false positive results with one exception.

Dissolved lead was identified above the GCTL in the ground water sample collected adjacent to the former Gene's Diesel Service facility. The ground water sample was collected from an area in which a septic tank was suspected to be located. It is possible that the septic tank is the source of the elevated lead concentration identified in GP-05.

In addition to the aforementioned soil and ground water contamination, there are existing conditions present at the subject site which present a potential environmental liability or concern with respect to the proposed development of the site. They include the following:

- Several areas containing soil waste and debris were identified across the site.
- The site is not serviced by a public sewer system. Therefore there are several septic tanks known to exist on the site.
- Two potable water wells were identified on the Taylor Property.
- A pond was present in the northeastern corner of the Mayr property. Additionally, the Palmetto Eastern Canal traversed the eastern boundary of the site.
- The ultimate condition or disposition of the railroad tracks which formerly traversed the site is unknown. Railroad tracks, ballast or railroad ties may have been buried in-place.
- There are several buildings and structures locate on the site which main contain lead-based paint or asbestos containing materials. A survey of these construction materials was beyond the scope of this investigation.
- Taylor Concrete is currently serviced by two 550-gallon ASTs.

Evidence that the aforementioned conditions contributed to the environmental impacts associated with the site was not identified during this investigation. However, these conditions represent potential liabilities that should be addressed in conjunction with the proposed development plans.

8.0 RECOMMENDATIONS

The following is a brief discussion of the presence of soil and ground water impacts identified on the Site and their effects on its proposed development. The proposed approaches have been successfully applied to commercial developments by Kimley-Horn in other parts of the State. These approaches are available under the new draft Global Risk Based Corrective Action Rule (62-780, FAC) or the Brownfield Program Rule (62-785, FAC).

8.1 Soil

Arsenic impacts in soil were identified across the site above either the Residential or Commercial SCTL. Because the arsenic UCL 95 value calculated for the entire site is above the current Residential SCTL, the impacted soil can not be transported off-site and used as clean fill material. If the soil were to be removed from the site, it would require proper disposal. Therefore it would presumably be cost effective to address the arsenic soil impacts on the site through the use of engineering controls.

The chromium concentrations identified at three locations exceeded the Leachability SCTL and therefore represents a potential for leachability. The infiltration of rainwater through the subsurface may induce the leaching of chromium into the ground water. However, no chromium ground water impacts were identified during this investigation. Similar to the arsenic concerns, the application of engineering controls may be used to remove the leachability pathway for chromium. As such, the chromium concentrations identified in the three soil samples are not considered a concern at this time.

Subject to FDEP approval, engineering controls are an acceptable remediation approach to address potential exposure to contaminated soils and may typically consist of a soil cover or impervious surfaces such as pavement or building foundations. The impervious surface cover removes the pathway for human exposure by direct contact with contaminated soils and removes the pathway for leaching of contaminants from soil through rainfall into the underlying ground. The proposed development of the site includes the use of impervious surfaces in the form of pavement and building surfaces. Therefore, the proposed development may provide the engineering controls necessary to address the impacted soil.

Engineering controls are applied in conjunction with institutional controls. Institutional controls are typically in the form of a restrictive covenant. The most likely form of a restrictive covenant on the subject site would require that no shallow potable well be installed on the property and that the asphalt and concrete cover be maintained. Kimley-Horn recommends that a Soil Remedial Action Plan be developed to address the use of engineering controls to eliminate human exposure pathways with respect to the arsenic and chromium

contaminated soil. The plan and engineering controls should be integrated into the proposed development plans for the site.

8.2 Ground Water

Based upon the levels of contaminants found in the ground water on-site and subject to FDEP approval, active ground water remediation does not appear to be necessary at this time. However, ground water monitoring may be required on an ongoing basis. The monitoring would most likely be conducted within the source areas and at the Site boundaries.

Because the ground water samples collected during the Phase II investigation were used for screening purposes, verification of the identified ground water impacts is needed. Therefore, Kimley-Horn recommends the installation of permanent monitoring wells in each of the areas were elevated concentrations of total metals were identified in the ground water. The installation and sampling of permanent monitoring wells with an effective sand pack and bentonite seal should facilitate the collection of representative ground water samples. Correspondingly, this data would be used to determine whether additional ground water characterization and monitoring is warranted.

8.3 Solid Waste

There are several locations across the site where solid waste has accumulated during the history of the site. In particular, several soil waste and debris piles were identified on the Mayr Property. While the areas of solid waste may have not contributed directly to the soil and ground water impacts identified at the site they do present a concern. Prior to construction and development, the solid waste and debris will have to be removed from the site and properly disposed. Kimley-Horn recommends that an attempt be made to quantify the volume of soil waste located on the Site. Additionally, an attempt should be made to qualify the types of debris present across the site in an effort to determine the specific disposal requirements and need for permits. In doing so, appropriate modifications may be made to the site work plans and costs.

There are two 55-gallon drums located on the Mayr Property containing soil which was impacted during the geotechnical investigation. Kimley-Horn recommends that the soil in these drums be profiled for disposal. Depending upon the results of the soil profile, it may be necessary to disposal of the soil at regulated hazardous waste facility.

8.4 Potable Water Wells and Septic Tanks

During the course of the Phase I and Phase II ESA, two potable water wells were identified on the Site (Taylor Property). Potable wells may be located on the Mayer and Creel Properties. However, at the time of this investigation, their

presence or location was not disclosed to Kimley-Horn. Presumably the development plans will include the use of potable water supplied by the City of Palmetto or a qualifying public water supply utility. However, Wal★Mart may decide to use one or more of the on-site potable wells as an alternative source of water for irrigation of fire suppression purposes. Alternatively, Wal★Mart may decide to utilize the wells as a source of water during the construction phase of the site development.

If Wal★Mart should decide to utilize the wells, Kimley-Horn recommends that the capacity and yield of the individual wells be measured to determine whether they are capable of meeting the required demand. Conversely, should Wal★Mart determine that the wells are not needed, Kimley-Horn recommends that the wells be abandoned in accordance the applicable state standards. If not properly abandoned, the wells could serve as a potential conduit for the downward migration of surficial contaminants into the underlying aquifer system. The wells should be abandoned prior to the initiation of any significant excavation or earthmoving work at the site.

A total of five septic tanks were identified on the site. Additional septic tanks may be present however there were not identified by to disclosed to Kimley-Horn at the time of this investigation. The septic tanks represent a potential source for ground water contamination. Therefore, Kimley-Horn recommends that the contents of the tank be removed and properly disposed. Additionally, the tanks should be excavated and disposed of properly.

9.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS

Refer to **Appendix H** for a summary of the qualifications of the environmental professionals that participated in the preparation of this report.

10.0 REFERENCES

Enviro-Audit & Compliance, Inc., 2003. *Phase I Environmental Site Assessment, N.J. Taylor/Taylor Concrete, Inc. Property*, Palmetto, Florida.

Enviro-Audit & Compliance, Inc, 2003. *ASTM Transactional Screening Process, Country Fair Flea Market Property*, Palmetto, Florida.

Miller, James A., 1990. *Ground Water Atlas of the United States, Alabama, Florida, Georgia and South Carolina, HA 730-G*, US Geological Survey.

Randazzo, Anthony F., 1997. *The Geology of Florida*, University Press of Florida, Gainesville, FL.

FIGURES



Not To Scale

Source: Microsoft Streets & Trips 2002

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Jacksonville, Florida 32216
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Site Location Map

Palmetto Site
Manatee County, Florida

047253397

Figure No. 1

Prepared By: Jason C. Sheasley, PG, CHMM



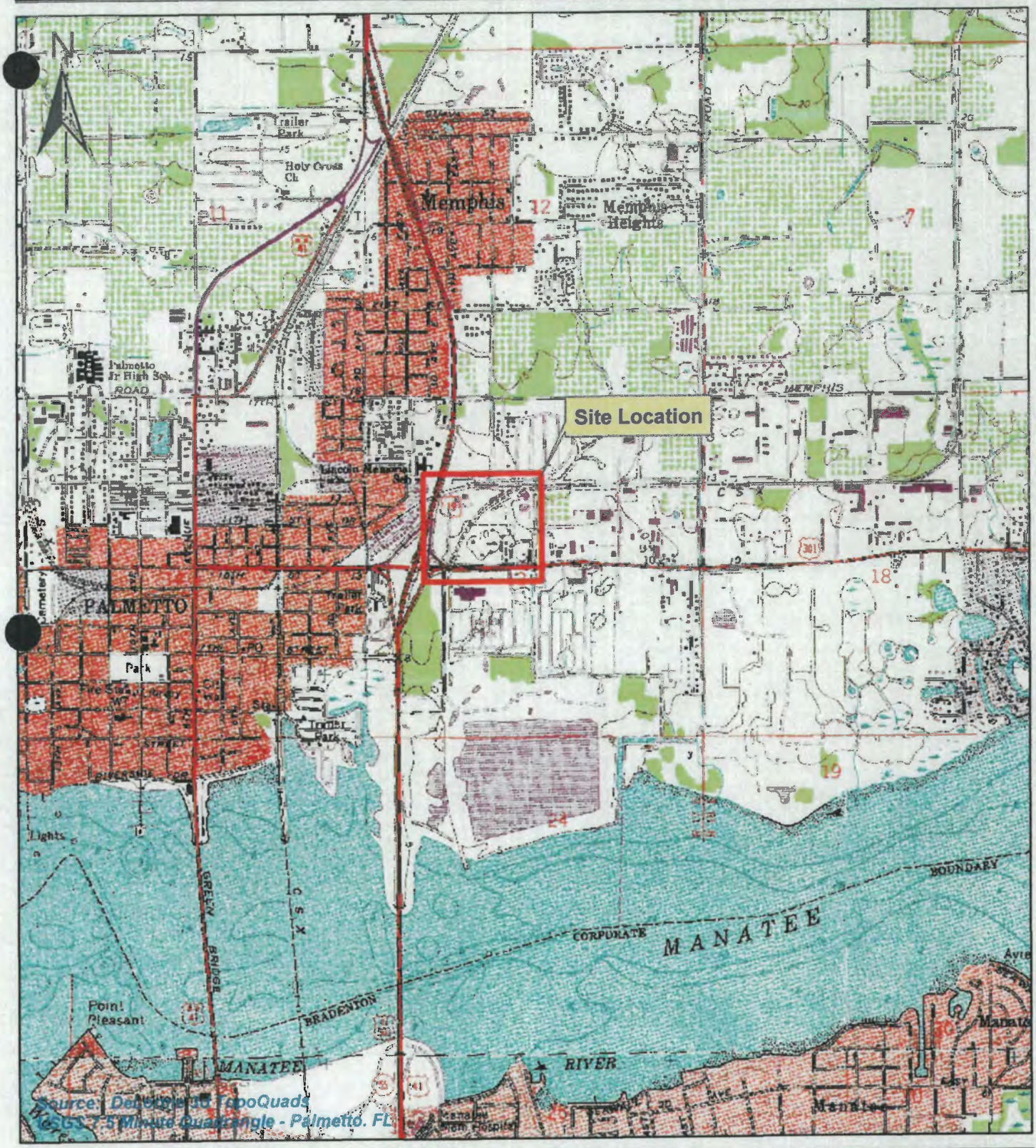
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Palmetto Site - Properties

Palmetto, Manatee County, Florida

047253397

Figure No. 2



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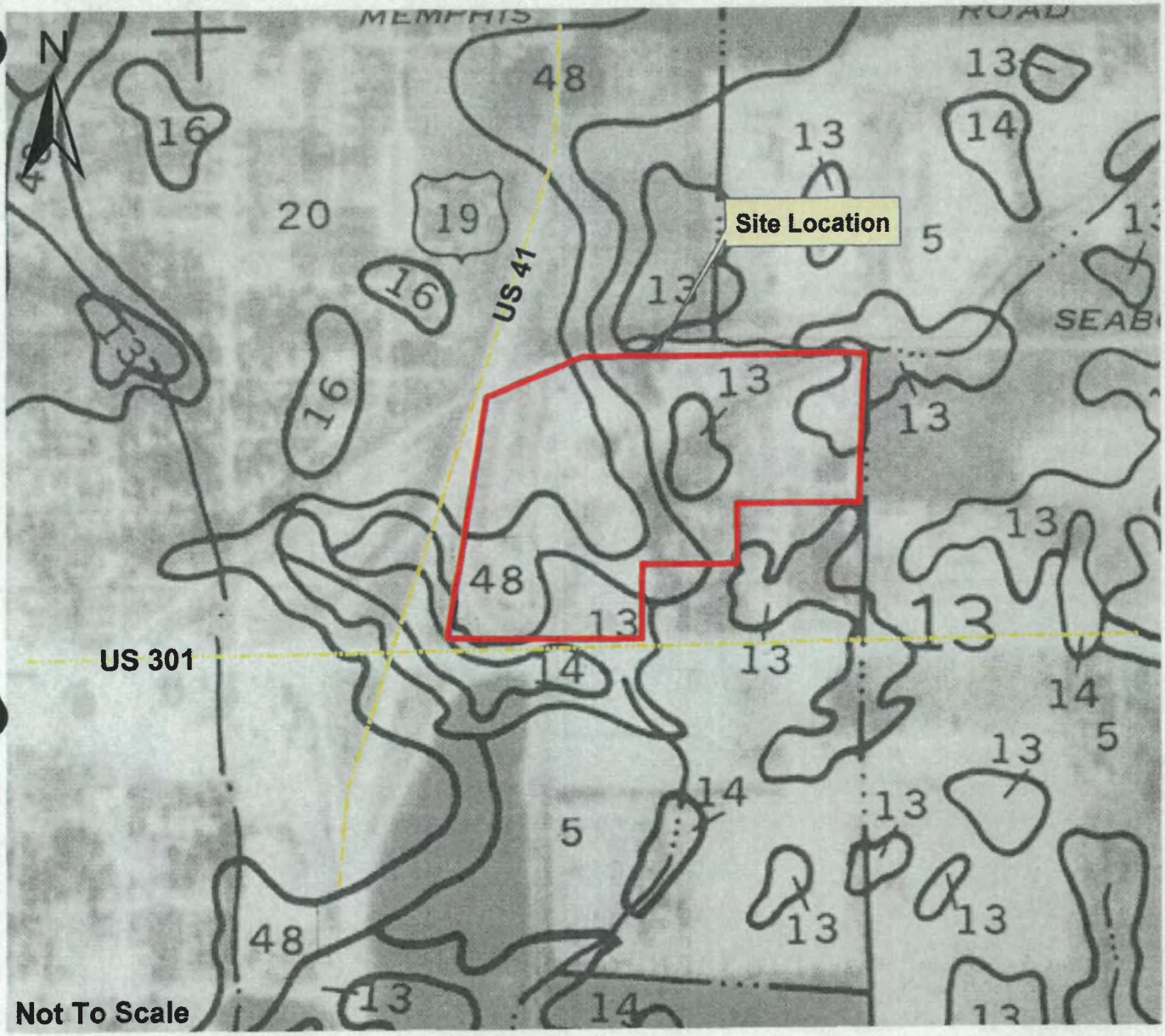
Topographic Map

Palmetto Site
Manatee County, Florida

047253397

Figure No. 3

Prepared By: Jason C. Sheasley, PG, CHMM



Source: USDA/SCS Soil Survey of Manatee County, Florida (April 1983)
FAESS Hydric Soils of Florida Hand Book, Third Edition (March 2001)

LEGEND

5 = Bradenton fine sand, limestone substratum (40% Hydric Inclusions)
13 = Chobee fine sand (Hydric Soil)
20 = EauGallie fine sand (30% Hydric Inclusions)
48 = Wabasso fine sand (30% Hydric Inclusions)

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USDA/SCS Soil Map

Palmetto Site
Manatee County, Florida

047253397

Figure No. 4

Prepared By: Jason C. Sheasley, PG, CHMM



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Recognized Environmental Conditions

Palmetto, Manatee County, Florida

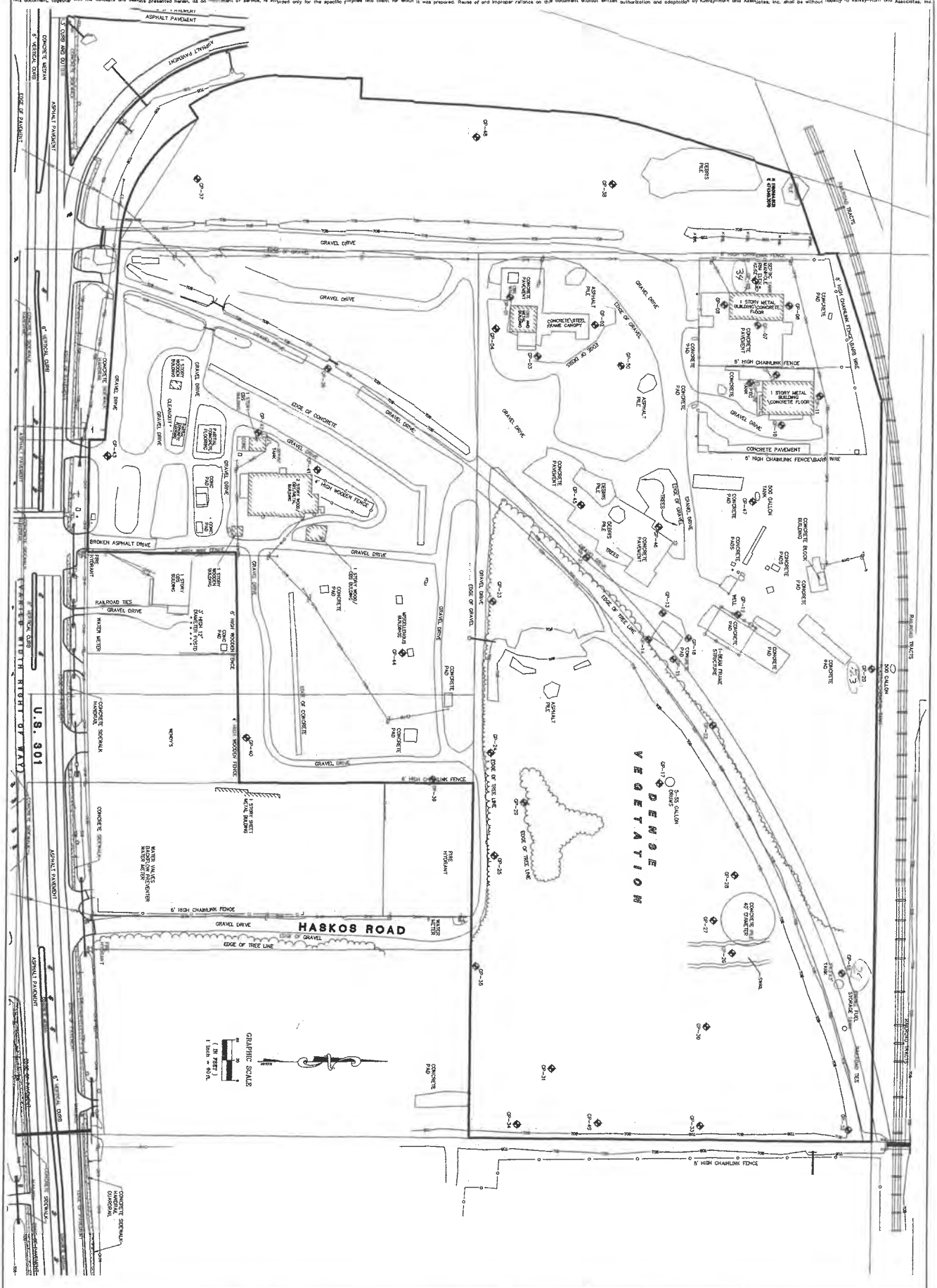
047253397

Figure No. 5

Prepared By: Jason C. Sheesley, PG, CHMM

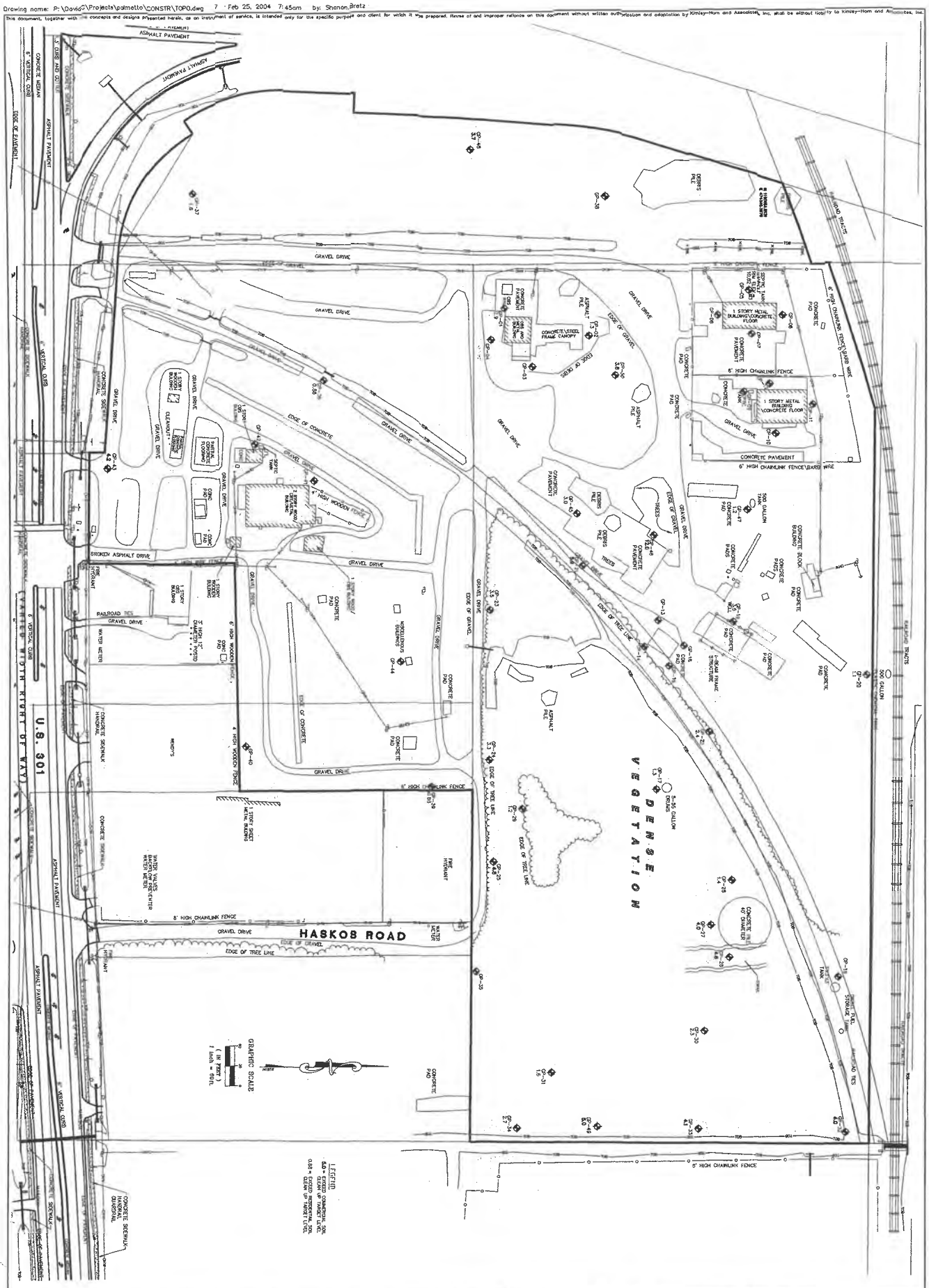
Drawing name: P:\davidG\Projects\palmetto\CONSTR\TOPO.dwg 6 Feb 25, 2004 7:45am by: Shannon.Bretz

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SHEET NUMBER 6	DATE 1/19/04	WAL-MART SUPERCENTER NO. 94660-00 PALMETTO MANATEE COUNTY, FLORIDA FLORIDA	SOIL BORING LOCTION MAP	SCALE AS NOTED DESIGNED BY DRAWN BY SEB CHECKED BY	DESIGN GEOLOGIST: JASON C. SHEASLEY FLORIDA REGISTRATION NUMBER: 2236 SEAL	Kimley-Horn and Associates, Inc. © 2004 KIMLEY-HORN AND ASSOCIATES, INC. 8711 PERIMETER PARK BOULEVARD, SUITE 4 JACKSONVILLE, FLORIDA 32216 - (904)-998-2004 FBPE No. CA 00000695	No. REVISIONS DATE BY

Drawing name: P:\David\C\Projects\palmetto\CONSTR\TOPO.dwg 7 Feb 25, 2004 7:45am by: Shanon.Bretz
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SHEET NUMBER 7	DATE 1/29/04 PROJECT NO. 047253397	WAL-MART SUPERCENTER NO. 94660-00 PALMETTO MANATEE COUNTY, FLORIDA FLORIDA	ARSNIC CONCENTRATIONS In SOIL (0-2' bgs)	SCALE AS NOTED DESIGNED BY DRAWN BY SEB CHECKED BY	DESIGN GEOLOGIST: JASON C. SHEASLEY FLORIDA REGISTRATION NUMBER: 2236 SEAL

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FSPE No. CA 00000696

No	REVISIONS	DATE	BY

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

JAN 21 2009

SOUTHWEST DISTRICT
TEMPLE TERRACE

January 2009

Site Rehabilitation Completion Report For Soil and Solid Waste

FDEP Site Nº 239458
FDEP Project Nº 282910

Wal★Mart – Palmetto, Florida
Store Nº 3370, NSC
US Highway 41 and US Highway 30 Site

Section 13, Township 34 S, Range 17 E
Manatee County, Florida

Prepared for
Wal★Mart Stores, Inc.
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January 20, 2009

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Dept. of Environmental Protection
JAN 21 2009
Southwest District

William Kutash
Environmental Administrator
Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

RE: Site Rehabilitation Completion Report
Wal-Mart Stores, Inc.
Palmetto, Manatee County, Florida
FDEP Site No 239458
FDEP Project No 282910

Dear Mr. Kutash:

Kimley-Horn and Associates, Inc. (KHA), on behalf of Wal-Mart Stores, Inc. (Wal-Mart), has prepared the following response to your December 22, 2008, correspondence regarding the above referenced Site. Following KHA's submittal of the October 2004 Combined Report and the corresponding response to the Department's comments on April 5, 2005, the Department approved the site-specific Site Assessment Report (SAR) and Remedial Action Plan (RAP) in a letter dated April 12, 2005. Accordingly, pursuant to the Departments April 12 2005 Combined Report Approval letter in July 2005, Wal-Mart initiated remedial action[1].

The Department's December 22, 2008 correspondence indicates that a Site Assessment Report, prepared pursuant to Chapter 62-780, Florida Administrative Code (FAC), is now required for the Site. However, the Department's approval of the Combined Report precedes the April 17, 2005 adoption of Chapter 62-780, FAC and, in accordance with the Department's policy, is the dispositive and controlling approval for the Site. No further assessment is required.

The December 22, 2008, correspondence asserts that the Departments, April 12, 2005 letter reportedly approved "proposed additional assessment." The

[1] Included herein is a Site Rehabilitation Completion Report for Soil and Solid Waste that outlines the remedial activities undertaken by Wal-Mart at the subject Site.

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Department's April 12, 2005 letter made no such declaration. In fact, it could not have given that KHA did not propose any additional assessment in its April 5, 2005 response to comments letter. More precisely, what KHA stated is that *additional waste characterization would be conducted* if wastes not suitable for disposal at a Class I or Class II landfill were identified on-site. Since no unsuitable Class I or Class II-type wastes were identified on-site, no additional waste characterization was performed. It is critical that the Department understands that at no time, either in telephone conversations, emails, or in formal submittals to the Department did KHA propose any additional soil or groundwater assessment. Therefore, the Department's comment regarding proposed additional site assessment is not based on fact and is incorrect.

Additionally, the December 22, 2008 correspondence references telephone conversations and/or emails that reportedly took place between KHA and Department staff regarding an impending submittal. There appears to be a misunderstanding regarding the nature of the document that KHA was preparing for submittal. The document in question is the Site Rehabilitation Completion Report contained herein, not a SAR.

Wal-Mart has undertaken the soil and solid waste remediation activities outlined in the RAP component of the approved October 2004 Combined Report. As such, the Site Rehabilitation Completion Report for Soil and Solid Waste (SRCR) contained herein, documents the remedial activities undertaken by Wal-Mart including the following:

- excavation and screening of buried solid waste from across the Site;
- beneficial reuse of screened solid waste as fill material at the Site;
- use of engineered surfaces to eliminate direct exposure pathways associated with the arsenic impacted soil remaining at the Site; and
- consistent with the approved RAP and Chapter 62-780.750 FAC, post active remediation monitoring of the localized ground water quality for arsenic and ammonia[2].

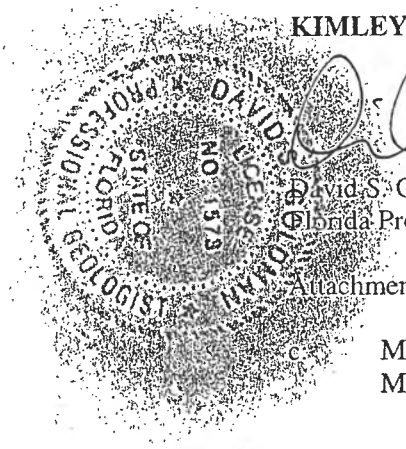
[2] The presence of buried solid waste within the water table was believed to have contributed to the detection of ammonia in the ground water. Testing of ground water at the Site conducted within the past two weeks – and years after removal of all buried soil waste and debris- confirms that ammonia no longer exists above its applicable GCTL; accordingly, it is no longer considered a contaminant of concern at the Site. Arsenic remains present in the ground water, however, in concentrations that are generally consistent with those observed during the 2004 site assessment activities; that is, they remain slightly above the 10 ug/L GCTL. Accordingly, the SRCR provides for continued monitoring of this contaminant.

Akerman Senterfitt, outside counsel for Wal-Mart, is currently in the process of drafting the restrictive covenants that will be applied to the Site. The restrictive covenants will be designed to limit the use of the Site for commercial purposes and preserve the integrity of the engineered surfaces constructed at the Site. Documentation regarding the restrictive covenant will be forwarded to the Department under separate cover.

On behalf of Wal-Mart Stores, Inc., we appreciate the Department's continued cooperation regarding this Site. Should you have any further questions or comments, please do not hesitate to contact me at (904) 828-3900. I may also be contacted via email at david.goldman@kimley-horn.com.

Sincerely,

KIMLEY-HORN AND ASSOCIATES, INC.



David S. Goldman, P.G.
Florida Professional Geologist No. 1573

Attachments: Site Rehabilitation Completion Report for Soil and Solid Waste

c: Michael R. Goldstein, Esq, Akerman Senterfitt
Mr. Matthew Femal, P.E. KHA

CERTIFICATION

I, Jason C. Sheasley, P.G., No.2236, certify that I currently hold an active license in the state of Florida and am competent through education or experience to provide geology services in the geology and hydrogeologic disciplines contained in this report. I further certify that this report was prepared by me or under my responsible charge as defined in Chapter 492, Florida Statutes, Chapter 61G6-2.005 F.A.C. Moreover, if offered by a corporation, partnership or through a fictitious name, I certify that the company offering the geologic services, Kimley-Horn and Associates, Inc. holds an active certificate of authorization No. GB-00001785 to provide the geology services

Date: January 20, 2009

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Florida P.G. License No. 2236
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1.0 INTRODUCTION

Kimley-Horn and Associates, Inc. (KHA) has prepared this Site Rehabilitation Completion Report (SRCR) for soil and solid waste on behalf of Wal★Mart Stores, Inc. (Wal★Mart) for its site (the "Site") in Palmetto, Manatee County, Florida. The following provides a summary of the remedial activities undertaken by Wal★Mart to address impacts identified in association with the property.

1.1 Purpose

The purpose of this SRCR, which was prepared in accordance with Chapter 62-780.750, Florida Administrative Code (FAC), is to document the remedial activities completed for the subject Site. Through the completion of the remedial activities described herein, the subject Site is eligible for NFA status in accordance with the provisions of Risk Management Option Level II as defined in Chapter 62-780.680(2), FAC.

1.2 Site Description and Site History

The Site is an approximately 31.0-acre, irregular-shaped, parcel located at the northeast corner of the intersection of U.S. Highway 301 (10th Street East) and U.S. Highway 41 in the City of Palmetto, Manatee County, Florida (**Figure 1**). The Site is currently operating as a Wal★Mart Supercenter, owned by Wal★Mart Stores, Inc. (**Figure 2**). Prior to development as a Wal★Mart Supercenter, the Site consisted of six contiguous parcels owned by three different individuals: Jeanne M. Creel, Fredrick Mayr and Nathan Taylor Jr. For the purposes of this report, each of the properties located within the conterminous Site boundary are referenced by the name of the property owner: Mayr property, Creel property, and Taylor property (**Figure 3**). The available historical information suggested that the contiguous properties constituting the Site had been used for commercial, light industrial or agricultural purposes during the past 20 to 30 years.

1.3 Summary of Previous Work

Site assessment activities completed by KHA were summarized in the *October 2004 Combined Report* submitted to the Florida Department of Environmental Protection (FDEP).

The *Combined Report* included the equivalent of a Site Assessment Report (SAR) and a Remedial Action Plan (RAP). The FDEP provided comments concerning the Combined Report in a letter dated February 10, 2005. KHA responded to the Department's letter on April 5, 2005. The *October 2004, Combined Report* was subsequently approved by FDEP in a letter dated April 12, 2005 (**Appendix A**).

2.0 SITE ASSESSMENT SUMMARY

Detailed information regarding the site assessment activities performed at the Site is contained in the *October 2004, Combined Report* and *April 2005, Combined Report Addendum*. The site assessment was completed and approval prior to the 2005 promulgation of Chapter 62-780, FAC. The results of the site assessment revealed the following:

- The principal contaminant of concern (COC) in the soil at the Site is arsenic.
- The principal COCs in the ground water at the Site are arsenic and ammonia.
- Detectable concentrations of arsenic were identified in the soil samples collected from the Site. The arsenic impacts are believed to be the result of both natural and anthropogenic sources. The concentrations of arsenic in soil were found to exceed the residential direct exposure Soil Cleanup Target Level (SCTL), as defined by Chapter 62-777, FAC, but all soil arsenic concentrations are below the current commercial direct exposure SCTL (Chapter 62-777, FAC.)
- Evidence collected during the site assessment suggests that portions of the Site were used for the disposal of solid waste. Five areas of buried solid waste were delineated on the Site. Figure 5 of the *October 2004, Combined Report,* depicts these areas of buried solid waste.
- Eleven areas on the Site contained piles of solid waste, organic material, and debris at the land surface. These areas are depicted on Figure 5 of the *October 2004, Combined Report.*
- No free product was identified on the Site during site assessment activities.

3.0 THE REMEDIAL ACTION ACTIVITIES

The approved remedial approach for the Site specified the use of engineering and institutional controls to address the identified COCs. The approach for addressing the solid waste on the Site was developed in accordance with the guidelines specified in the FDEP's *Guidance for Disturbance and Use of Old Closed Landfills or Waste Disposal Areas in Florida, May 3, 2001.* Incorporated into the remedial approach developed for the Site was the beneficial re-use of soil and screened solid waste (SSW) on the Site in conjunction with the combined use of engineering and institutional controls.

The site assessment was completed and the subsequent RAP was approved prior to the April 2005 promulgation of Chapter 62-780, FAC. As such, the Site Assessment and RAP were prepared in accordance with the applicable FDEP policies in place prior to April 2005. The remedial approach that was developed and accordingly implemented for the identified soil impacts is equivalent to Risk Management Option Level II defined in Chapter 62-780.680(2).

The *October 2004, Combined Report* was issued prior to the April 2005 changes to the Chapter 62-777, FAC default Cleanup Target Levels. Prior to April 2005, the default residential and commercial SCTL for arsenic was 0.8 milligrams per kilogram (mg/Kg) and 3.7 mg/Kg, respectively. Subsequent to April 2005, the default residential and commercial SCTL for arsenic were increased to 2.1 mg/Kg and 12 mg/Kg, respectively. Under the pre-April 2005 default SCTLs, the arsenic concentrations in the soil samples from the Site exceeded the commercial SCTL. However, under the current default SCTLs, the identified arsenic concentrations exceed the residential SCTL but do not exceed the commercial SCTL.

The FDEP was notified prior to conducting any activities associated with the excavation, removal or relocation of solid waste from the Site. Methane and combustible gases were monitored during the excavation and removal activities. The ambient air quality was also monitored to determine whether conditions for the generation of combustible gases were being generated. None were encountered.

KHA subcontracted MACTEC Engineering and Consulting, Inc. (MACTEC) to observe and document the excavation and disposal of soil and solid waste from the Site. MACTEC prepared a summary report entitled *Report of Solid Waste Monitoring Activities*, dated June 12, 2006, which is provided in **Appendix B.** The following summary of remedial action activities is based on the observations of KHA and the solid waste summary report provided by MACTEC. Furthermore, KHA subcontracted ATC Associates, Inc. (ATC) to complete the post remediation ground water monitoring activities on the Site; which are described in section 3.4.

3.1 Solid Waste Removal

Case Contracting Company (CASE) was the general contractor hired by Wal★Mart to oversee the construction of the new Wal★Mart supercenter. CASE hired the sub-consultant Pospiech Contracting (Pospiech) to conduct the excavation and disposal of solid waste from the Site. Three separate disposal facilities were used for the disposal of solid waste from the Site: Manatee County Solid Waste Management Facility (MCSWMF) located at 3035 Lena Road, in Bradenton Florida; Citrus County Central Landfill (CCCL) located at 230 West Gulf-to-Lake Highway, in

Lecanto Florida; and Okeechobee Landfill Inc. (OLI) located at 10800 Northeast (NE) 128th Avenue, in Okeechobee Florida. **Table 1** is a summary of the waste removed from the Site and the corresponding disposal locations.

Table 1
Summary of Solid Waste Disposal

Dates of Excavation	Material Disposed	Tons	Disposal Facility
August 3, 2005	Solid Waste	179.67	MCSWMF
August 18, 2005	Oversized Tires	21.15	CCCL
August 18, 2005 February 27, 2006	Contaminated Soil	28,929.58	OLI
September 27, 2005 December 13, 2005	Crushed Concrete (SSW)	3,780	Recycled for use on-site

As stated in the *October 2004, Combined Report*, five separate areas totaling 6.21 acres were identified as containing buried solid waste (Figure 5 and Figure 6 of the *October 2004, Combined Report*). These areas were located on the Mayr property. Four of the areas totaling 5.21-acres, coincided with the footprint of the Site's stormwater pond (Figure 5 of the *October 2004, Combined Report*). The fifth area was approximately 1-acre in size and was located in the western half of the Mayr property. The solid waste and debris present in the five areas was excavated in stages to coincide with the building and construction activies.

The buried solid waste and debris contained an appreciable volume of soil. To reduce the amount of the waste requiring off-site disposal, the excavated material was power screened to separate the debris greater than 4-inches in size from the soil matrix. In accordance with the approved Combined Report, the accumulated solid waste was examined to determine whether it met one of the following three classifications: (1) hazardous waste; (2) waste suitable for disposal in a permitted Class I or Class II landfill; or (3) waste suitable for disposal in a permitted Class III landfill. The solid waste was stockpiled on-site for disposal based upon its classification. No hazardous waste was identified in association with the Site or the buried solid waste and debris. Waste manifests and weight tickets for material properly disposed of off-site are provided in digital format in **Appendix C.**

The screened solid waste (SSW) generated during the screening of the buried solid waste was staged for on-site disposal. The SSW was staged on-site until the site clearing work was completed. The SSW was staged in 1,000-cubic yard stockpiles that were covered with visqueen of a minimum thickness of 6 mils. The covers were maintained to reduce the potential for the generation of dust and stormwater run off from the stockpiles. Silt fencing or other appropriate barriers were placed around the stockpile to prevent uncontrolled runoff. The stockpile locations were determined by the site contractor in order to minimize excess handling and transportation.

The SSW generated during the screening process was assumed to be impacted with arsenic concentrations above the residential SCTL but below the commercial SCTL. As such, this material was beneficially reused on-site and was placed beneath impervious surfaces (parking lot

and building slab) thereby eliminating the potential for human exposure. In accordance with the approved Combined Report, the SSW was placed a minimum of one-foot above the mean high ground water elevation; eliminating the potential for the leaching of arsenic into the ground water. In addition to the SSW, all other soil excavated from the Site remained on the property and was used during the development.

3.2 Soil Remediation

The approach for addressing the impacted soils includes the combined use of engineering and institutional controls.

The arsenic containing soils were identified in association with the stormwater pond or within the vicinity of the proposed building footprint and/or parking lot. The impacted soil from the stormwater pond was excavated and disposed of off-site (**Table 1**). Arsenic impacted soil was excavated from the area of the storm water pond and was placed under an impervious surface on the Site. The remainder of the arsenic impacted soil remained in-place and was ultimately covered by impervious surfaces. Site grading and leveling activities were done such that impacted soils were not deposited within any of the proposed green spaces on the Site.

The site assessment results suggest that the arsenic impacted soil remaining on-site exceeds the residential SCTL, but does not exceed the commercial SCTL. Although an engineering control is not required, the development of the Site has provided additional protection of human health and the environment through the use of engineered surfaces. In order to address the arsenic on-site, institutional controls in the form of a restrictive covenant will be used to limit the use of the property for non-residential purposes. Further information regarding the institutional controls is included in Section 3.5.

3.3 Dewatering Plan

A dewatering plan had been developed as part of the *October 2004, Combined Report.* However dewatering was not necessary as part of the site construction activities, due to low ground water table elevations during excavation.

3.4 Post Remediation Ground Water Monitoring

The following is a discussion of the post-remediation ground water monitoring conducted at the Site. The post-remediation ground water quality data collected from the Site is summarized on **Table 2.**

3.4.1 October 2007 Ground Water Sampling

Post remediation ground water monitoring was conducted at the Site in accordance with the approved Combined Report. Under the direction of KHA, ATC Associates, Inc. (ATC) installed and sampled three ground water monitoring wells at the Site. ATC prepared a subsequent Groundwater Monitoring Report dated January 24, 2008, which is provided in **Appendix D.** This report summarizes the installation and sampling of the monitoring wells.

The monitoring well installation activities were completed on October 9, 2007. Three ground water monitoring wells (identified as MW-1, MW-2, and MW-3) were installed for the purpose of collecting representative ground water samples from the Site. The monitoring wells were installed by Preferred Drilling Solutions, Inc. The monitoring wells were installed into the water table in accordance with the FDEP's current standard operating procedures (SOPs.) The well completion logs and boring logs are provided in **Appendix D**.

Following installation, each of the monitoring wells was developed until the discharge water appeared free of sediments and ground water parameters stabilized. A total of four 55-gallon drums (three soils and one ground water) of investigative derived wastes (IDW) were generated, subsequently sampled, and disposed. Documentation related to the sampling and disposal of these drums is included in the ATC report (**Appendix D.**)

The three wells were sampled on October 17, 2007 for total arsenic by EPA Method 6010 and total ammonia by Method 350.1. The turbidity was stable prior to sampling; below 20 NTU's as required by the SOP. The ground water sampling logs are provided in **Appendix D**. The ground water results indicated two of the samples (MW-1 and MW-2) contained concentrations of arsenic which exceeded the GCTL for arsenic (**Table 2**). The GCTL for total arsenic is 10 micrograms per liter (µg/L). The ground water samples collected from MW-1 and MW-2 contained total arsenic concentrations at 10.4 µg/L and 12.4 µg/L, respectively. In addition, the sample collected from MW-2 had an ammonia concentration of 3,000 µg/L (3.0 mg/L), which exceeded the GCTL of 2,800 µg/L (2.8 mg/L).

3.4.2 January 2008 Ground Water Sampling

In response to the arsenic exceedances identified in the ground water during the October 17, 2007 sampling event, the monitoring wells were re-sampled on January 11, 2008 by ATC. Monitoring well MW-1 contained arsenic at a concentration of 7.25 µg/L, which is below the GCTL (**Table 2**). Arsenic was not identified above the laboratory method detection limit in MW-2. Monitoring well MW-3 was not re-sampled in January 2008 because no arsenic or ammonia exceedences were identified during the previous round of sampling. In addition, the ammonia concentrations identified in monitoring wells MW-1 and MW-2, 380 µg/L and 2,700 µg/L, respectively, were below the GCTL (**Appendix D**).

3.4.3 January 2009 Ground Water Sampling

Additional post-remediation ground water sampling was conducted in January 2009. KHA collected ground water samples MW-1, MW-2, and MW-3 on January 8, 2009. The ground water samples were analyzed by Advanced Environmental Laboratories, Inc., (AEL) accredited by the NELAC (National Environmental Laboratory Accreditation Conference) Institute, for total arsenic by EPA Method 6010 and total ammonia by Method 350.1. The AEL laboratory report is provided in its entirety in **Appendix E**. The turbidity was stable prior to sampling; below 20 NTU's as required by the SOP. The ground water sampling logs and instrument calibration logs are provided in **Appendix F**.

The January 8, 2009 ground water quality data indicates arsenic is present in both MW-1 and MW-2 at concentrations of 15 µg/L (0.015 mg/L), which exceeds the arsenic GCTL of 10 µg/L (0.01 mg/L). Arsenic was detected below the GCTL in MW-3 at a concentration of 7.2 µg/L

.0072 mg/L

(0.072 mg/L). Ammonia was not detected above the GCTL (2,800 µg/L or 2.8 mg/L) in any of the monitoring wells (**Table 2**).

Based on the results of the January 8, 2009 sampling event, the monitoring wells were re-sampled on January 15, 2009. KHA retained ATC to conduct the ground water sampling. A copy of the corresponding ground water sampling logs are provided in **Appendix G**. The ground water samples were analyzed total arsenic (USEPA Method 6010) by PEL Laboratories, Inc., which is accredited by the NELAC Institute. ATC collected ground water samples from each monitoring well, plus a duplicate sample from MW-2. The results of the January 15, 2009 sampling event indicate the presence of total arsenic in each of the monitoring wells above the GCTL (**Table 2**). The total arsenic concentrations identified in monitoring wells MW-1, MW-2 and MW-3 were 18.9 ug/L, 14.7 ug/L and 12.8 ug/L, respectively. A copy of the corresponding laboratory data sheets is provided in **Appendix H**.

The purpose of the post-remediation ground water sampling was to demonstrate that the soil and solid waste remedial activities did not contribute to the degradation of the localized ground water quality. The remedial strategy included the on-site relocation of SSW suspected as containing elevated arsenic concentrations and the removal of buried solid waste believed to be contributing to the ammonia concentrations identified in the ground water. As such, the post-remediation ground water monitoring included the analysis of total arsenic and ammonia.

The post-remediation ground water quality data suggests that the removal of solid waste from below the water table has effectively reduced the ammonia concentrations in the ground water. Ammonia is no longer present in the ground water at concentrations exceeding the GCTL.

During the post-remediation ground water monitoring, total arsenic was identified above the current GCTL. However, the identified total arsenic concentrations are comparable to the concentrations identified in the ground water during the 2004 site assessment activities. During the 2004 site assessment activities, eight monitoring wells (MW101 through MW-108) were installed across the Site. These monitoring wells were sampled for various analytes including total arsenic. In March 2004, the total arsenic concentrations identified in the ground water were below the 2004 GCTL and ranged from 8.4 ug/L to 20 ug/L. At the time the site assessment was completed, total arsenic was not considered, ground water contaminant of concern relative to the 2004 GCTL. During the January 15, 2009 ground water sampling event, the total arsenic concentrations ranged from 12.8 ug/L to 18.9 ug/L. The site assessment total arsenic concentrations are within the same order of magnitude as the post-remediation total arsenic concentrations. The 2007, 2008 and 2009 post-remediation ground water quality data exhibits no significant increase in the total arsenic concentrations identified in the ground water. As such, there is no evidence available to suggest that the soil remedial activities contributed to the localized ground water degradation. Concentrations of arsenic above the current GCTL (10 ug/L) were present in the ground water prior to the initiation of the soil remedial activities.

3.5 Engineering Controls

The site-specific remedial approach includes the application of engineered surfaces to eliminate the human exposure pathway with respect to the impacted soils. Approximately 75% of the site is covered by impervious surfaces including building slabs, concrete sidewalks or asphalt parking areas. The site design included the beneficial reuse of the SSW as fill material. The SSW, which

is suspected to contain arsenic concentrations above the residential SCTL, was placed beneath the impervious surfaces across the Site. Additionally, the impacted soil was placed a minimum of one-foot above the mean high water elevation to eliminate the potential for the leaching of contaminants into the ground water. The green space areas across the Site were excavated and replaced with two feet of clean fill material to preclude direct contact exposure with the impacted soil. A map depicting the location of the SSW relative to the engineered surfaces is included in **Appendix I**.

KHA has proposed the combined use of engineering and institutional controls for the Site. Documentation pertaining to the institutional controls will be submitted to the Department under a separate cover.

4.0 GROUND WATER MONITORING

The approved *2004 Combined Report* evaluated the arsenic concentrations in the ground water based on the 2004 GCTL. On January 1, 2005, the arsenic GCTL changed from 50 ug/L to 10 ug/L. The site assessment and post-remediation ground water quality data indicates the presence of total arsenic above the current GCTL at the Site. Furthermore, the post-remediation ground water quality data suggest that the soil remedial activities have not resulted in an increase in total arsenic concentrations identified in the ground water. As such, KHA proposes additional monitoring to address the arsenic concentrations in the ground water through an expanded network of monitoring wells as set forth in **Figure 4.**

All monitoring wells will be or are already installed to a depth of approximately 15 feet bgs using hollow-stem auger techniques. Continuous split-spoon samples will be collected from each borehole for the purpose of documenting the subsurface lithology. The monitoring wells will be constructed of 2-inch diameter, schedule 40 PVC casing with ten feet of 0.01-inch machine slotted well screen. An appropriately graded sand pack will be placed in the annular space between the borehole and the well screen. The sand pack will extend approximately two feet above the top of the well screen. The monitoring wells will be completed below-grade with a locking pressure cap, concrete pad and flush-mounted protective cover. The monitoring wells will be developed following installation. The proposed well development will facilitate the removal of sediment that accumulated within the well casing and screen during installation and increase hydraulic communication between the sand pack and the water-bearing formation.

The new and existing monitoring wells will be sampled for total and dissolved arsenic (USEPA Method 6010) quarterly. Quarterly ground water monitoring reports will be prepared and submitted to the FDEP. The quarterly ground water monitoring reports will include the following:

- Written description of the ground water sampling methodology.
- And interpretation of the ground water quality data.
- Maps depicting the monitoring well locations and localized direction of ground water flow.
- Copies of the laboratory data sheets, monitoring well construction details, ground water sampling logs and lithologic logs.

The first quarterly ground water monitoring report will include documentation pertaining to the installation and construction of the additional monitoring wells. The quarterly ground water monitoring reports will be prepared under the direction of, and signed and sealed by a Professional Geologist licensed in the State of Florida.



Not To Scale

Source: Microsoft Streets & Trips 2002

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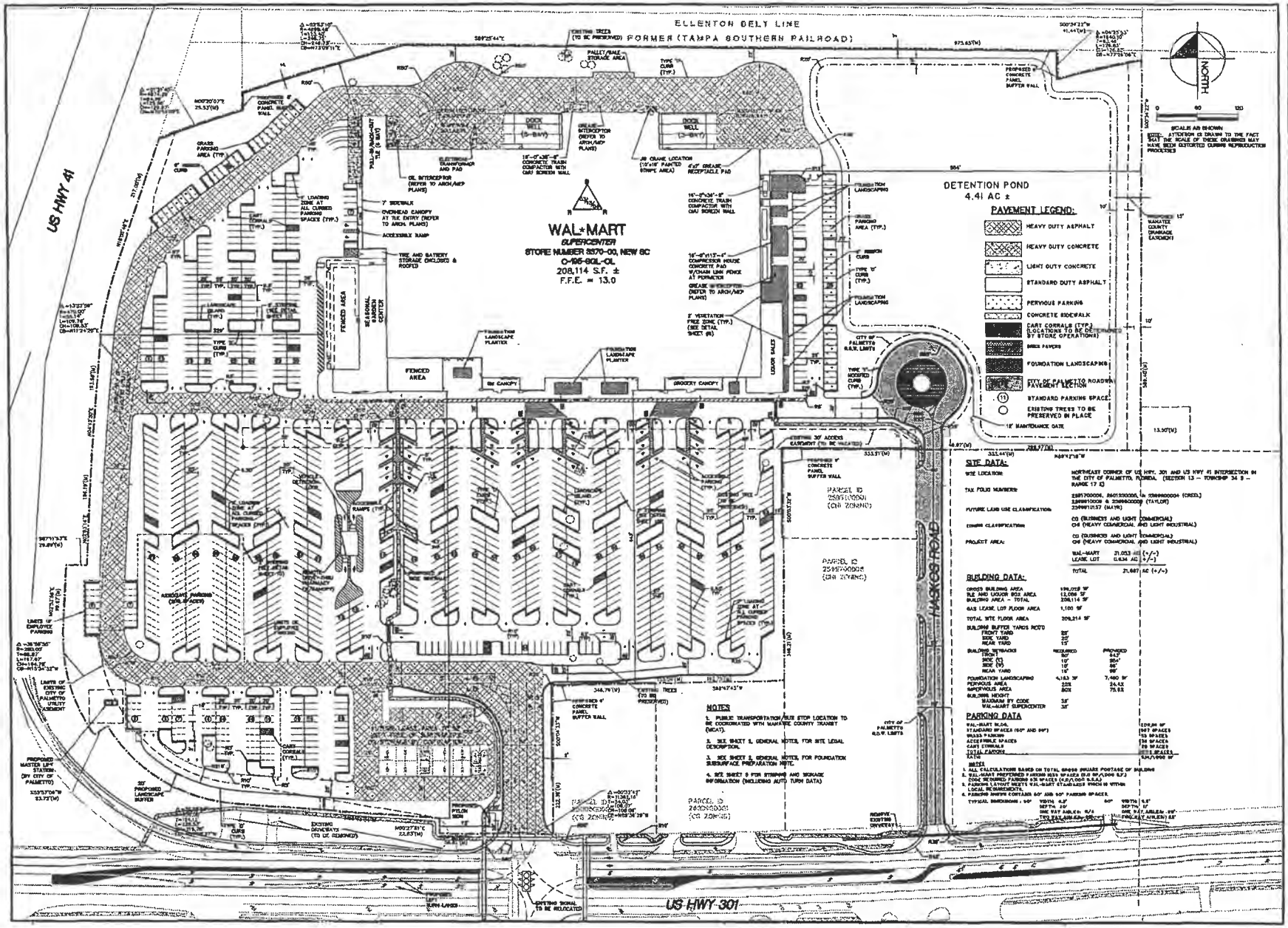
Site Location Map

Palmetto Site
Manatee County, Florida

047253397

Figure No. 1

Prepared By: Jason C. Sheasley, PG, CHMM



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PRELIMINARY
FOR REVIEW ONLY
Not for construction, bidding, or permit purposes.

R. TRENT STEPHENSON, P.E.
FL REG. #59514

NO.	DATE	BY	DESCRIPTION
1	04/08/04	RLM	REVISED SITE PLAN

SITE PLAN

WAL-MART - PALMETTO, FLORIDA
STORE No. 3370-00 (C-195-SGL-OL)
1 - CITY OF PALMETTO, FLORIDA
PALMETTO AREA SITE

SCALE: 1"=60'
DRAWING NAME: 3370SP01
SHEET No.: 2



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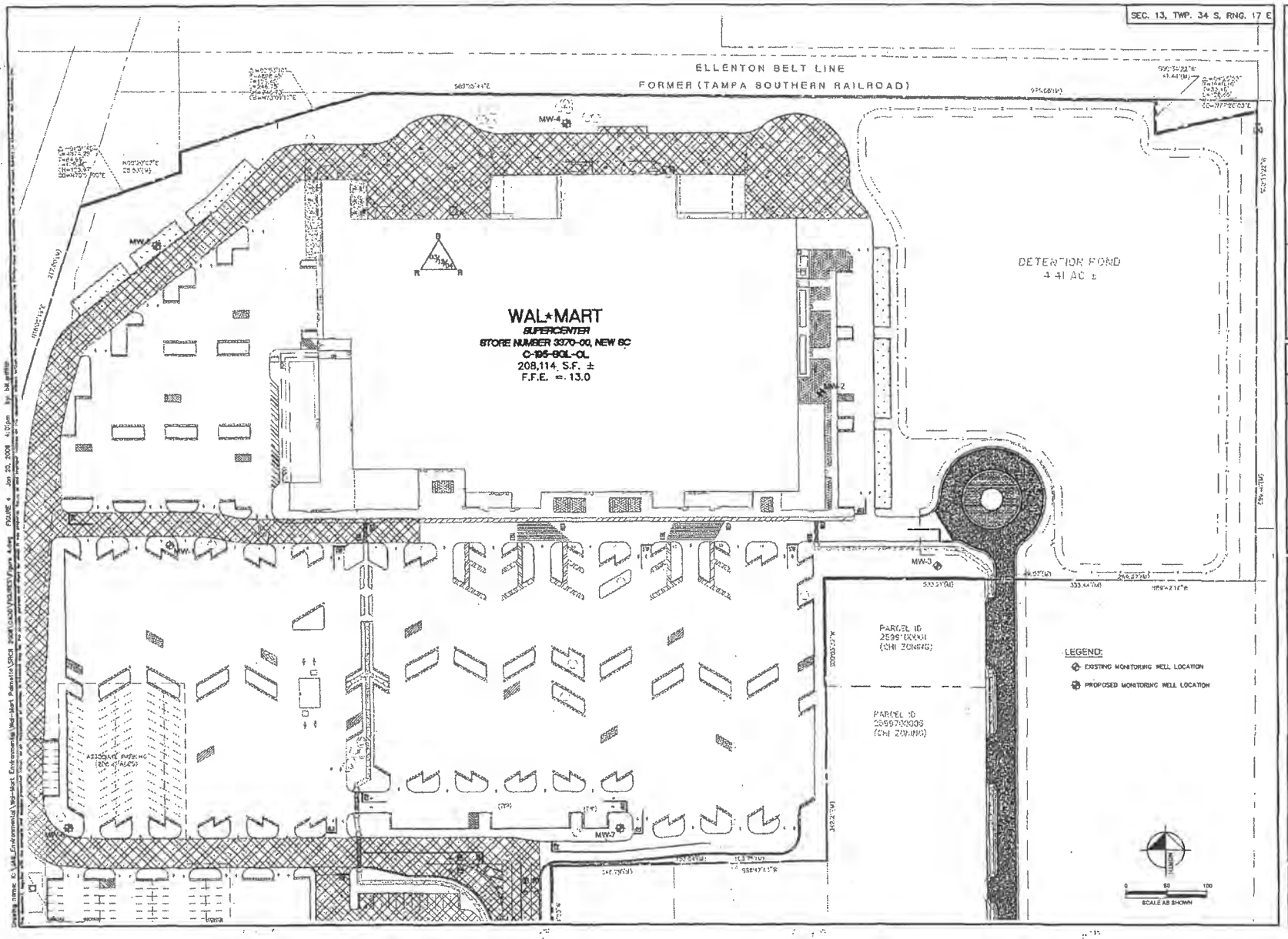
Palmetto Site - Historic Properties

Palmetto, Manatee County, Florida

047253397

Figure No. 3

Prepared By: Jason C. Sheasley, PG, CHMM



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no.	remarks	by	date

drawn by	checked by	date
JS	JS	01/29/09

FIGURE 4
PROPOSED MONITORING WELL LOCATIONS

WAL-MART SUPERCENTER
STORE NUMBER 3370-00, NewSC
PALMETTO, MANATEE COUNTY, FLORIDA

SCALE 1"=60'

PROJECT NO. 042833097

FIGURE 4

Kimley-Horn
and Associates, Inc.

Suite 300
3917 Princess Palm Avenue
Tampa, Florida
33610-8034

September 29, 2010

Dept. of Environmental Protection
SEP 29 2010
Southwest District

Mr. Robert Sellers
Environmental Specialist III
Division of Waste Management
Florida Department of Environmental Protection, Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

RE: **Additional Groundwater Sampling & Surveying Results**
Walmart Palmetto Site, Manatee County, Florida ("Site" or "Property")
FDEP Site # 239458
FDEP Project # 282910

Dear Mr. Sellers:

Kimley-Horn and Associates, Inc. ("Kimley-Horn"), on behalf of Wal-Mart Stores East, LP ("Wal-Mart"), would like to present the results of additional groundwater sampling activities conducted in connection with the above-referenced Site. As discussed with the Florida Department of Environmental Protection (the "Department" or "FDEP"), Wal-Mart's environmental counsel, Jason Lichtstein of Akerman Senterfitt, has been in discussions with Karyl Alderman, with FDEP's Office of General Counsel, concerning legal and regulatory issues to reach an understanding and agreement regarding the Site. With respect to soil, Mr. Lichtstein and Ms. Alderman are still discussing legal and regulatory issues associated with soil conditions and the appropriate next steps to seek closure or completion regarding this media.

On the subject of groundwater, and pursuant to Wal-Mart's representative's recent discussions with the Department, Kimley-Horn completed the following work: (i) resampling of MW-8, MW-11, MW-12, MW-13, and MW-20 for arsenic, (ii) collecting groundwater levels in all existing groundwater monitoring wells, and (iii) confirming the casing elevation for MW-20. These efforts were completed on July 26 and August 10, 2010. Following are the results of those efforts.

GROUNDWATER ACTIVITIES

On July 26, 2010, Kimley-Horn completed the sampling of monitoring wells MW-8, MW-11, MW-12, MW-13, and MW-20 for arsenic. Prior to sampling, each well was purged in accordance with FDEP Standard Operating Procedures (SOPs) utilizing a peristaltic pump until pH, conductivity, turbidity, dissolved oxygen, and temperature measurements were stabilized in accordance with FDEP SOP sampling criteria or until greater than five well volumes had been achieved. Representative groundwater samples were then collected in pre-cleaned sample bottles, placed on ice, and transported to PEL Laboratory (PEL), Tampa, Florida for analysis by EPA method 7060. Included in **Appendix A** are the field logs associated with the groundwater sampling and depth to water measurement tasks.

On August 11, 2010, Kimley-Horn, a state certified Registered Land Surveying company, resurveyed the casing elevation for monitoring well MW-20.

Groundwater Elevation Data

On August 11, 2010, Kimley-Horn resurveyed the Top of Casing (TOC) elevation for monitoring well MW-20. The TOC elevation was confirmed to be 10.28 National Geodetic Vertical Datum 1929 (NGVD), as previously reported.

Depth to water for all the wells was measured on July 26, 2010 and August 10, 2010 (**Table 1**). **Figures 1** and **2** shows that the groundwater flow direction for the Site is to the east for the wells completed in the Upper Surficial Aquifer.

Groundwater Sampling Results

Based on the July 26, 2010 laboratory analytical results, there appears to be a general increase in arsenic concentrations for wells MW-8, MW-11, and MW-12 and MW-13. The analytical results for groundwater collected from monitoring well MW-20, installed within the right-of-way southwest of the Property, decreased from 244 to 172 micrograms per liter (ug/l). The laboratory analytical results are summarized in **Table 2**. **Figure 3** depicts the most recent analytical results for the project and included in **Appendix B** are the laboratory analytical reports.

Based on the groundwater sampling activities completed to date, the following information is supportive of the fact that an upgradient source is more than likely contributing to the degradation of groundwater quality within the area and at the subject Property.

- Groundwater flow direction for the Site is to the east.
- Contamination exists in monitoring well MW-20, located off-site and upgradient.
- Wells located along the western property boundary of the Site are also impacted by elevated levels of arsenic.
- Sampling data shows that arsenic concentrations increase from the west to the east, which is consistent with the groundwater flow direction at the Site. These trends are indicative of the existence of an off-site source west of the subject Property.

Based on this data, we believe that an off-site groundwater source is impacting the Walmart Site. As a result, we respectfully request that no additional groundwater investigation be required by Wal-Mart as they are not responsible for upgradient contamination that has migrated on Site and degraded groundwater quality.

Thank you for your review and consideration of this correspondence. Should you have any questions or would like to meet to discuss this further, please do not hesitate to contact us at (813) 620-1460.

Sincerely
KIMLEY-HORN AND ASSOCIATES, INC.

Kelly L. Bishop, PG
Project Manager

David Goldman, PG
Vice President

Cc: Karyl Alderman, Esq., FDEP
Ms. BJ Hicks, Wal-Mart
Jason Lichtstein, Esq., Akerman Senterfitt

I, Kelly Bishop, P.G. No.2590, certify that I currently hold an active license in the state of Florida and am competent through education or experience to provide geology services in the geology and hydrogeologic disciplines contained in this report. I further certify that this report was prepared by me or under my responsible charge as defined in Chapter 492, Florida Statutes, Chapter 61G6-2.005 F.A.C. Moreover, if offered by a corporation, partnership or through a fictitious name, I certify that the company offering the geologic services, Kimley-Horn and Associates, Inc., holds an active certificate of authorization No. GB-00001785 to provide the geology services.

Kelly Bishop

Date: September 29, 2010

Kelly Bishop, P.G.
Florida P.G. License No. 2590
Geology Business No. GB-00001785
Kimley-Horn and Associates, Inc.
10117 Princess Palm Ave., Suite 300
Tampa, Florida 33610
Phone (813) 620-1460

KELLY BISHOP LICENSE No. PG2590 STATE OF FLORIDA PROFESSIONAL GEOLOGIST

FIGURES

LEGEND:

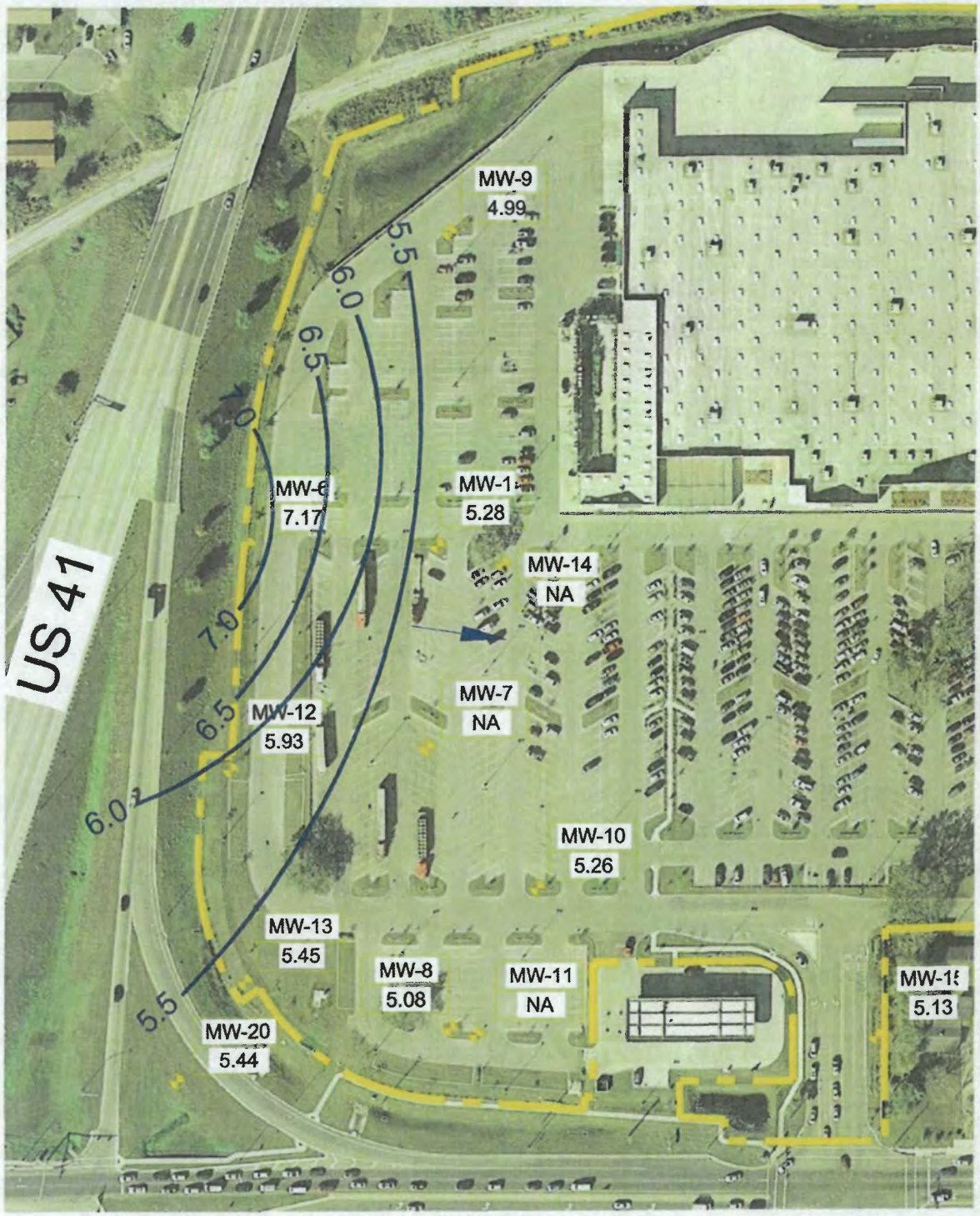
- MONITORING WELL LOCATION
- MW-9 / 7.4 — MONITORING WELL / WATER LEVEL FT, NGVD
- 6.0 — GROUNDWATER CONTOUR, FT, NGVD
- DIRECTION OF GROUNDWATER FLOW

NA = NOT APPLICABLE. MONITORING WELL NOT COMPLETED WITHIN UPPER SURFICIAL AQUIFER.

NORTH

0 150

SCALE FEET



No.	REVISIONS	DATE	BY

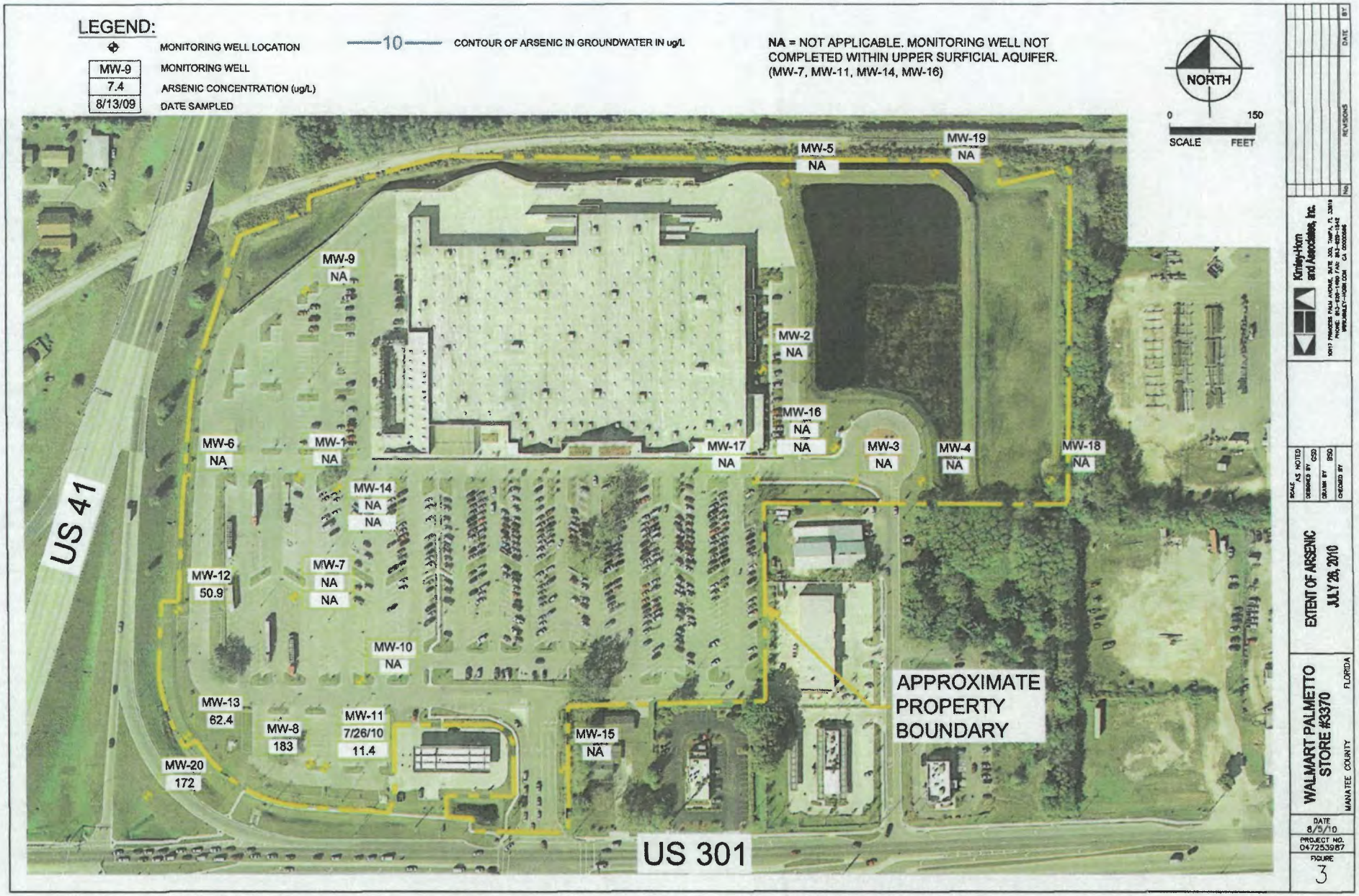
Kimley-Horn and Associates, Inc.
10117 PRINCESS PALM AVENUE, SUITE 300, TAMPA, FL 33610
PHONE: 813-620-1460 FAX: 813-620-1542
WWW.KIMLEY-HORN.COM CA 00000696

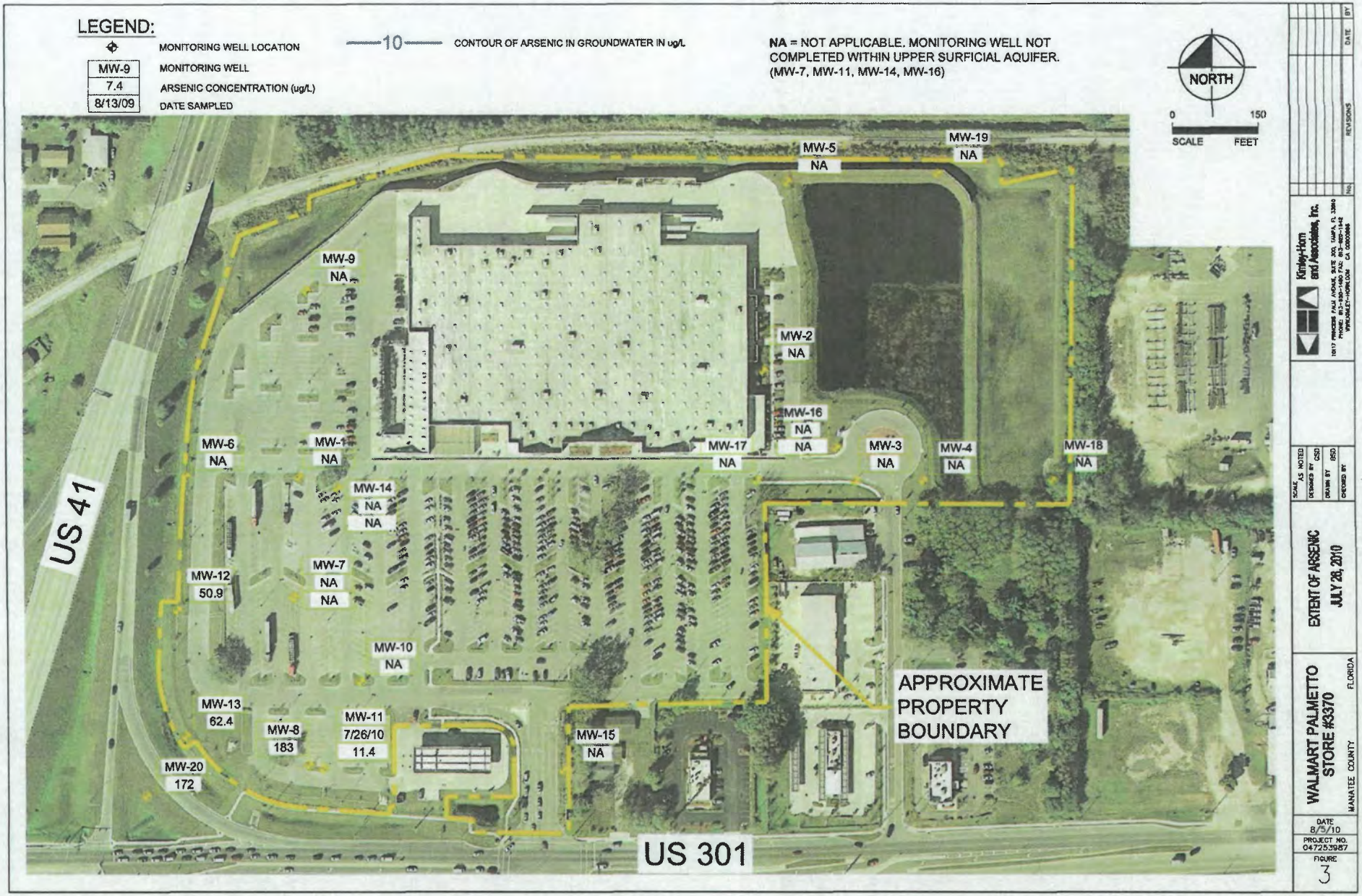
SCALE AS NOTED
DESIGNED BY
DRAWN BY BSD
CHECKED BY

GROUNDWATER CONTOURS IN UPPER SURFICIAL AQUIFER JULY 26, 2010

WALMART PALMETTO STORE #3370
MANATEE COUNTY FLORIDA

DATE 8/5/2010
PROJECT NO. 047253987
FIGURE 1


LEGEND:
MONITORING WELL LOCATION
MW-9
MONITORING WELL
7.4
ARSENIC CONCENTRATION (ug/L)
8/13/09
DATE SAMPLED
10
CONTOUR OF ARSENIC IN GROUNDWATER IN ug/L
NA = NOT APPLICABLE. MONITORING WELL NOT COMPLETED WITHIN UPPER SURFICIAL AQUIFER. (MW-7, MW-11, MW-14, MW-16)
NORTH
0
150
SCALE
FEET
MW-5 NA
MW-19 NA
MW-9 NA
MW-2 NA
MW-16 NA
MW-6 NA
MW-1 NA
MW-17 NA
MW-3 NA
MW-4 NA
MW-18 NA
MW-14 NA
NA
MW-7 NA
NA
MW-12 50.9
MW-10 NA
MW-13 62.4
MW-8 183
MW-11 7/26/10 11.4
MW-15 NA
MW-20 172
US 41
US 301
APPROXIMATE PROPERTY BOUNDARY
1
Kimley-Horn and Associates, Inc.
REVISIONS
NO
DATE
BY
SCALE AS NOTED
DESIGNED BY CSD
DRAWN BY BSD
CHECKED BY
EXTENT OF ARSENIC JULY 28, 2010
WALMART PALMETTO STORE #3370
MANATEE COUNTY
FLORIDA
DATE 8/5/10
PROJECT NO. 047253987
FIGURE 3



Kimley-Horn and Associates, Inc.
1617 PRINCESS PALM AVENUE, SUITE 305, TAMPA, FL 33610
PHONE: 813-620-1460 FAX: 813-620-1461
WWW.KIMLEY-HORN.COM CA 00000696

NO.	REVISIONS	DATE	BY

SCALE: AS NOTED
DESIGNED BY: CSD
DRAWN BY: CSD
CHECKED BY: DSD

EXTENT OF ARSENIC
JULY 28, 2010

WALMART PALMETTO
STORE #3370
MANATEE COUNTY
FLORIDA

DATE: 8/5/10
PROJECT NO.: 047253987
FIGURE: 3

Kimley»Horn

October 2, 2014

Robert Sellers, CHMM
Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RE: Groundwater Monitoring Report
Palmetto Wal-Mart Site
Manatee County, Florida
FDEP Site # COM_239458
FDEP Project # 2829

Dear Mr. Sellers:

On behalf of Wal-Mart Stores, Inc. (Walmart), Kimley-Horn and Associates, Inc. (Kimley-Horn) has reviewed and provided the groundwater monitoring data for the Walmart site located at 508 10th Street East in Palmetto, Florida (the "Site"). The groundwater monitoring was conducted as set forth in the March 6, 2014 email from Robert Sellers of the Florida Department of Environmental Protection (FDEP) to David Goldman, P.G. of Kimley-Horn. The email recommended the following:

- Completion of two (2) consecutive semi-annual groundwater sampling events to demonstrate that arsenic concentrations are either stable or decreasing as would be expected in this scenario. The groundwater sampling can be limited to monitoring wells MW-2, MW-3, MW-4, MW-5, MW-17, MW-18, and MW-19.

- Installation and survey of a staff gauge on the canal east of the Site to evaluate water level in canal relative to groundwater flow.

Groundwater samples were collected from the designated wells on March 24 and September 9, 2014. A staff gauge was installed in the canal east of the site and the elevation of the staff gauge surveyed. **Table A** provides a summary of historical arsenic data for the designated groundwater monitoring wells. **Table B** provides historical water level data. **Figure 1** and **Figure 2** provide groundwater elevation data for the sampling events. **Figure 1** provides information for the staff gauge within the canal east of the Site. **Figure 2** does not include water elevation at the staff gauge as the device was not present during the September 2014 sampling event. The staff gauge within the canal may have been removed by debris or high water levels. **Figure 3** provides historic arsenic groundwater data for the designated wells.

Figure 1 and Figure **2** indicate that groundwater flow is toward the east in the vicinity of the Site. **Figure 1** indicates that during the March 24, 2104 sampling event, the water level within the canal was lower than the adjacent water table to the west. This is consistent with the observed direction of groundwater flow.

With the exception of the results for MW-19, groundwater results for the September 8, 2014 event were consistent with previous sampling results. The arsenic value for the sample from MW-19 was 62 ug/L. This monitoring well was resampled on September 12, 2104 and the subsequent arsenic

concentration was reported at 36 ug/L. This value is consistent with previous results from the Site and suggests the September 8, 2014 data is an anomaly.

As shown in **Figure 3** and **Table A**, arsenic concentrations have remained relatively stable over the past several years of monitoring. The average arsenic concentration for each well varies from 7.6 ug/L to 34.1 ug/L. Of the seven wells in the vicinity of the pond being monitored, well MW-17 is the only well location that has an average arsenic concentration below the Groundwater Cleanup Target Level (GCTL). This well is situated approximately 195 feet southwest of the stormwater pond and is located farther away from the pond than any other groundwater monitoring wells being sampled.

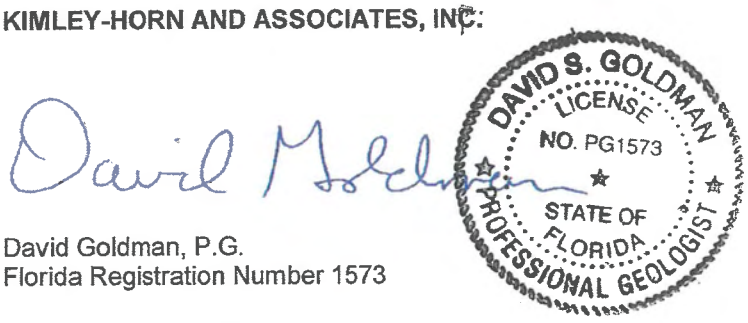
Attachment B contains plots of historical arsenic groundwater data for each individual well. All of these plots are provided with the same vertical scale. Data from wells MW-4, MW-5, MW-17, and MW-18 have remained relatively stable. Arsenic results for MW-3 have been stable since 2009. The data for MW-2 and MW-19 display a wider variation but remain within a certain range over the past several years. Results for MW-19 have the highest average arsenic concentration and show the greatest variation in values over the last 5 years. It is the opinion of Kimley-Horn that the observed variations are related to the interaction of the stormwater pond, as this well is closer to the pond than any other well.

The results of the semi-annual sampling have indicated that arsenic concentrations are stable and that groundwater flow in the area of the pond is eastward. Based on these results, we request closure of the groundwater conditions on the property through application of a water use restriction.

Please contact David Goldman at david.goldman@kimley-horn.com or 904-828-3912 if you have any questions.

Sincerely:

KIMLEY-HORN AND ASSOCIATES, INC.

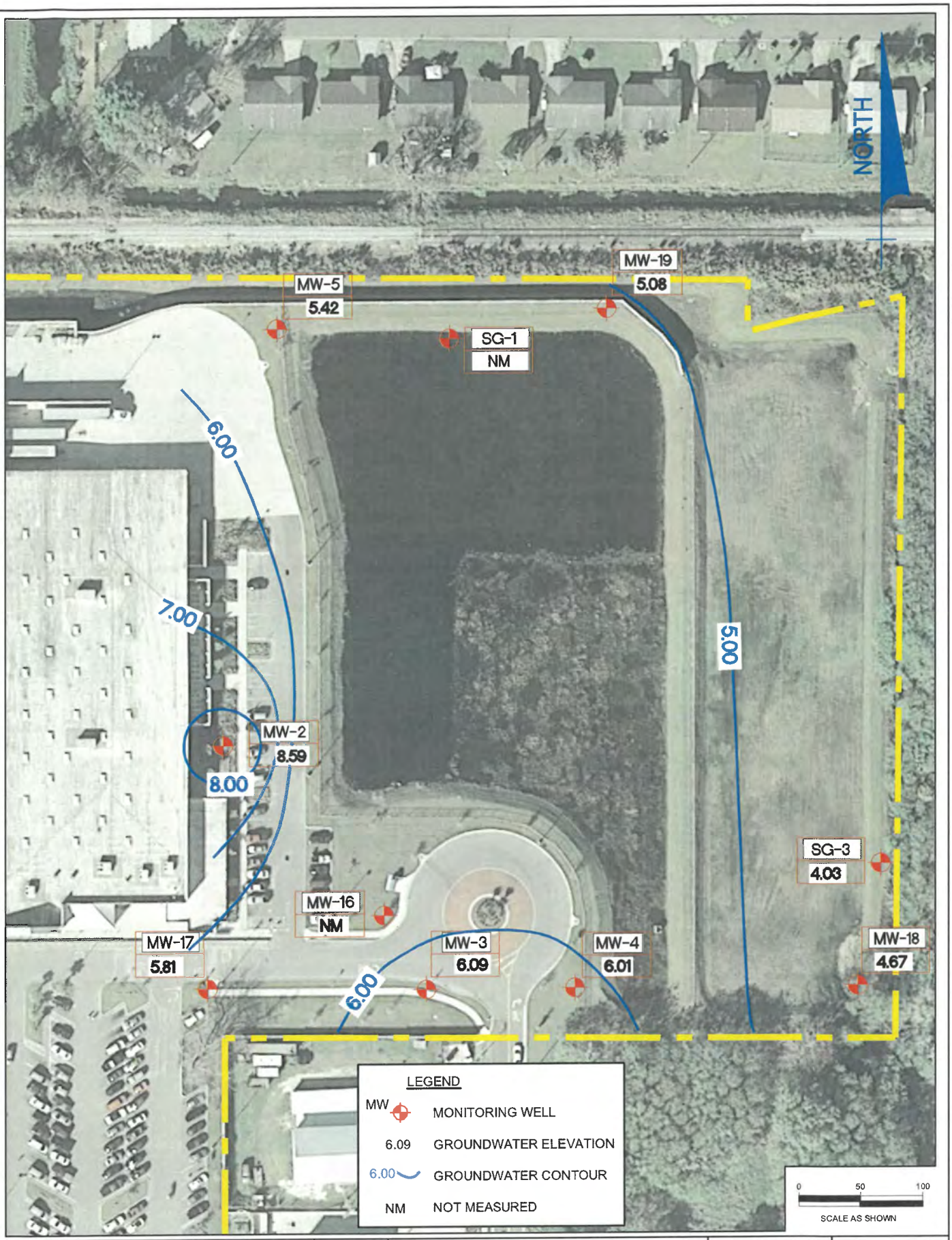


David Goldman, P.G.
Florida Registration Number 1573

Attachments: Tables A and B
Figures 1 - 3
Attachment A Sample logs, laboratory reports, and chain of custody forms
Attachment B Plots of historical arsenic groundwater for individual wells

c: Toni McCroy, Wal-Mart Stores, Inc.
Michael Goldstein, Goldstein Environmental Law Firm

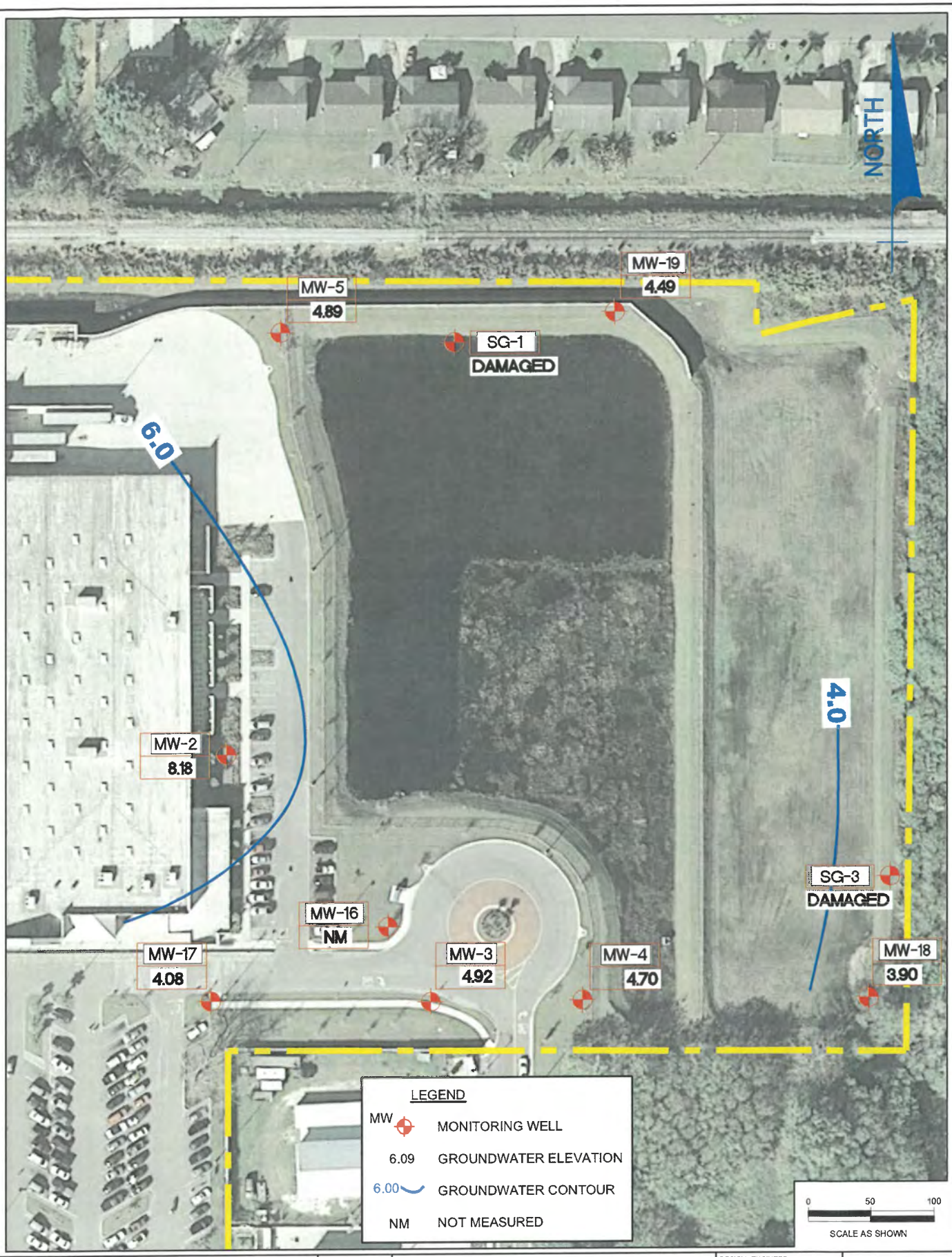
FIGURES



Drawing name: K:\JAX_Environmental\Wal-Mart Environmental\Wal-Mart Palmetto\2014\Groundwater Monitoring 2014\March 2014\Figures\CADD\Figure 1 – Site Location Map.dwg FIGURE 3 Sep 22, 2014 4:42pm by: leah.zihlman

This document, together with the concepts and designs presented herein, as an instrument of service, is intended only for the specific purpose and client for which it was prepared. Reuse of and improper reliance on this document without written authorization and adaptation by Kimley-Horn and Associates, Inc. shall be without liability to Kimley-Horn and Associates, Inc.

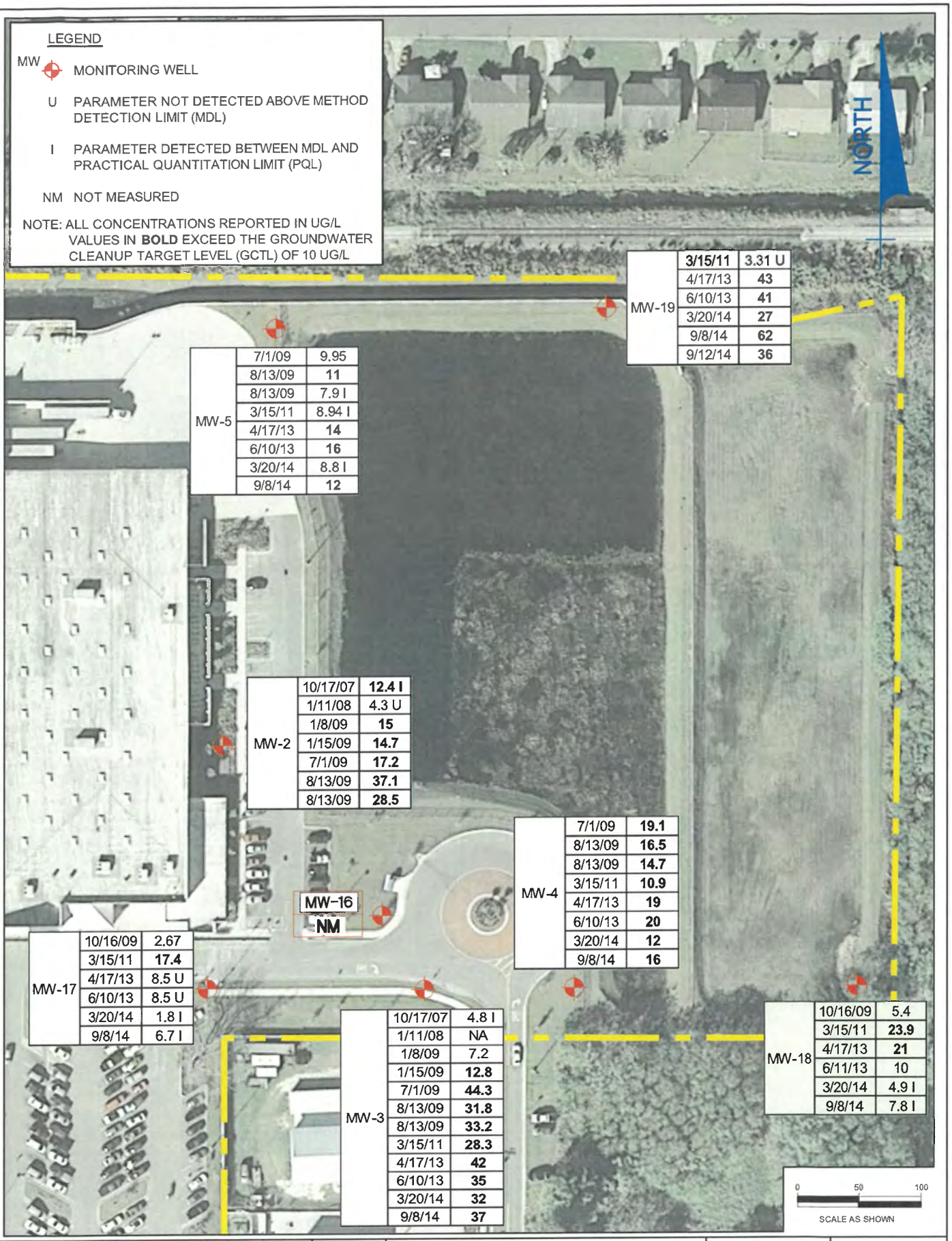
SCALE: AS NOTED DESIGNED BY: D.S.G DRAWN BY: L.M.Z. CHECKED BY: D.S.G.	Kimley»Horn © 2014 KIMLEY-HORN AND ASSOCIATES, INC. 8657 BAYPINE ROAD, SUITE 300, JACKSONVILLE, FL 32256 PHONE: 904-828-3900 FAX: 904-367-1692 WWW.KIMLEY-HORN.COM CA 00000696	DATE: SEPT. 2014 PROJECT NO.: 047253987	GROUNDWATER ELEVATION UPPER SURFICIAL AQUIFER MARCH 24, 2014 FOR ALTA LAKESIDE PROPERTY JACKSONVILLE, DUVAL COUNTY, FLORIDA	DESIGN ENGINEER: DAVID GOLDMAN, P.G. FLORIDA P.G. LICENSE NUMBER: FL 1573 DATE:	FIGURE NUMBER 1



Drawing name: K:\JAX_Environmental\Wal-Mart Environmental\Wal-Mart Palmetto\2014\Groundwater Monitoring 2014\March 2014\Figures\CADD\Figure 2 - GW Contours.dwg FIGURE 3 Sep 22, 2014 4:49pm by: leah.zihlman

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SCALE: AS NOTED DESIGNED BY: D.S.G DRAWN BY: L.M.Z. CHECKED BY: D.S.G.	Kimley»Horn © 2014 KIMLEY-HORN AND ASSOCIATES, INC. 8657 BAYPINE ROAD, SUITE 300, JACKSONVILLE, FL 32256 PHONE: 904-828-3900 FAX: 904-367-1592 WWW.KIMLEY-HORN.COM CA 00000696	DATE SEPT. 2014 PROJECT NO. 047253987	GROUNDWATER ELEVATION UPPER SURFICIAL AQUIFER SEPTEMBER 8, 2014 FOR WALMART PALMETTO STORE NUMBER 3370	DESIGN ENGINEER: DAVID GOLDMAN, P.G. FLORIDA P.G. LICENSE NUMBER: FL 1573 DATE:	FIGURE NUMBER 2



Drawing name: K:\JAX_Environmental\Wal-Mart Environmental\Wal-Mart Palmetto\2014\Groundwater Monitoring 2014\March 2014\Figures\CADD\Figure 3.dwg FIGURE 3 Sep 22, 2014 5:32pm by: leah.zhliman

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Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

September 15, 2015

VIA EMAIL ONLY: Mark.Mcguire@wal-mart.com

Mr. Mark McGuire
Wal-Mart Realty Compliance
2001 SE 10th Street
Bentonville, Arkansas 72716-0550

Re: **No Further Assessment**
Palmetto Wal-Mart Site
508 10th Street East, Palmetto
Manatee County, Florida
FDEP Site # COM_239458
FDEP Project # 282910

Dear Mr. McGuire:

The Department has reviewed the file for the Wal-Mart Tampa (Palmetto) Store located at 508 10th Street East property (Site) in Palmetto, Florida and is in receipt of a copy of the executed restrictive covenant (RC) for the site. The executed RC was recorded in Book 2583 on pages 7940 through 7959 with Manatee County on August 25, 2015. The property has concentrations of contaminants in soil and groundwater that exceed default standards found in Table 2 of Chapter 62-777, Florida Administrative Code (F.A.C.). The exceedances found in soil and groundwater at the property will be managed via institutional and engineering controls. Maps showing the location of the Palmetto Wal-Mart Store property and the location of the "contaminated site" (i.e., contaminated soil), summary tables, and the recorded RC are included as Exhibits 1 through 4.

Although the Site does not meet the requirements for closure under Chapter 62-780, F.A.C., the Department is not requesting that further site rehabilitation activity be conducted at this time and is closing the files on this case.

Please note that if the land use changes or if new information confirms the existence of an area of previously unknown contamination on your property which exceeds the site-specific rehabilitation levels established in accordance with Section 376.30701(2), Florida Statutes (F.S.), or which otherwise poses the threat of real and substantial harm to public health, safety, or the environment the case may be re-opened.

In addition, please be aware that the Department may require further remedial action or assessment at the Site and may take enforcement action at the Site if the property owner causes, contributes to, or exacerbates the release or threat of release of any hazardous substance, through any act or omission; and/or if the property owner does not continue to exercise due care in the management of the property.

Should you have any questions or concern, please contact Bob Sellers, at the letterhead address above, via email to robert.sellers@dep.state.fl.us or by telephone at (813) 470-5761.

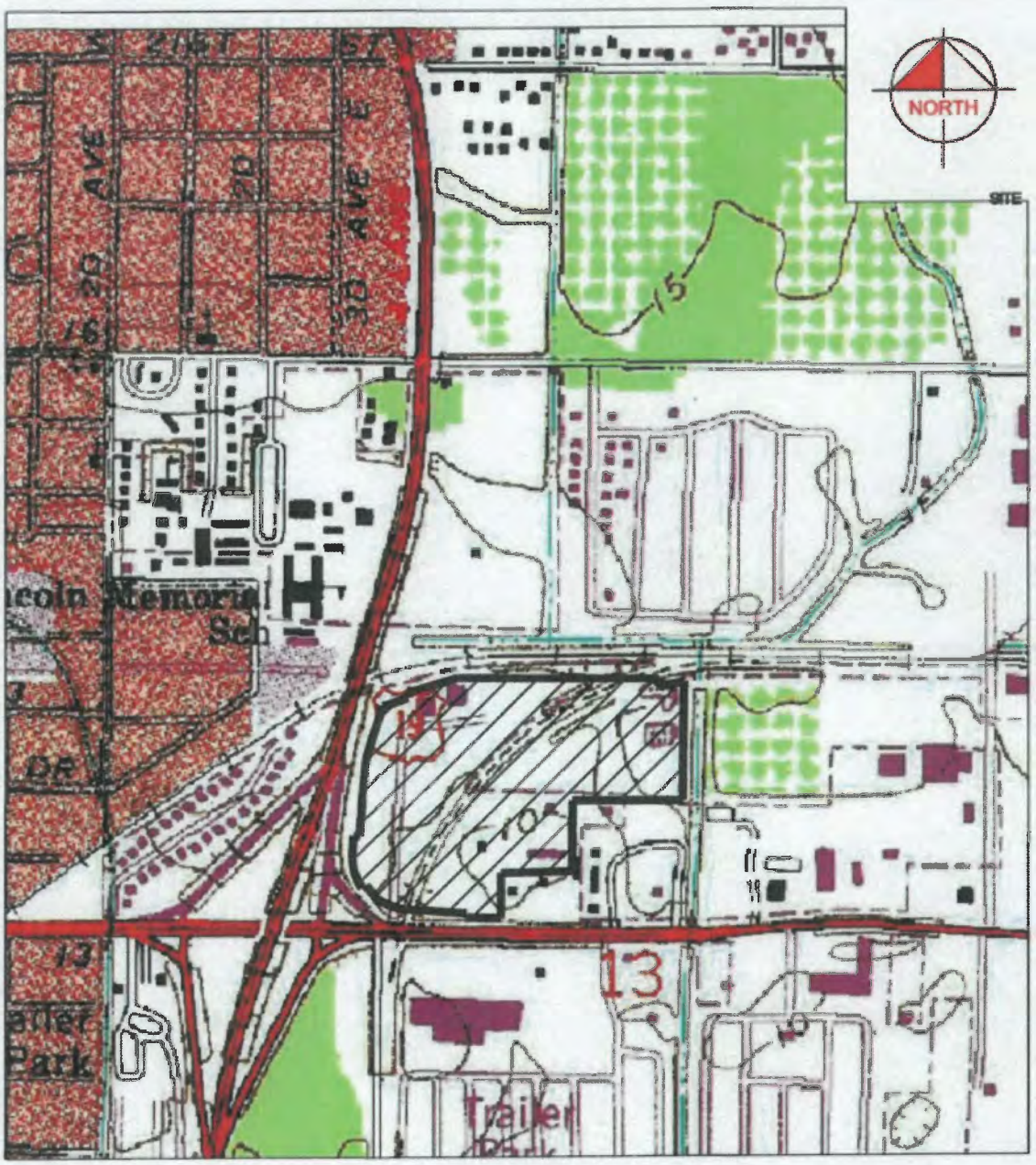
Sincerely yours,

Mary E. Yeargan, P.G.
Southwest District Director
Florida Department of Environmental Protection

Enclosure: Exhibits 1-4

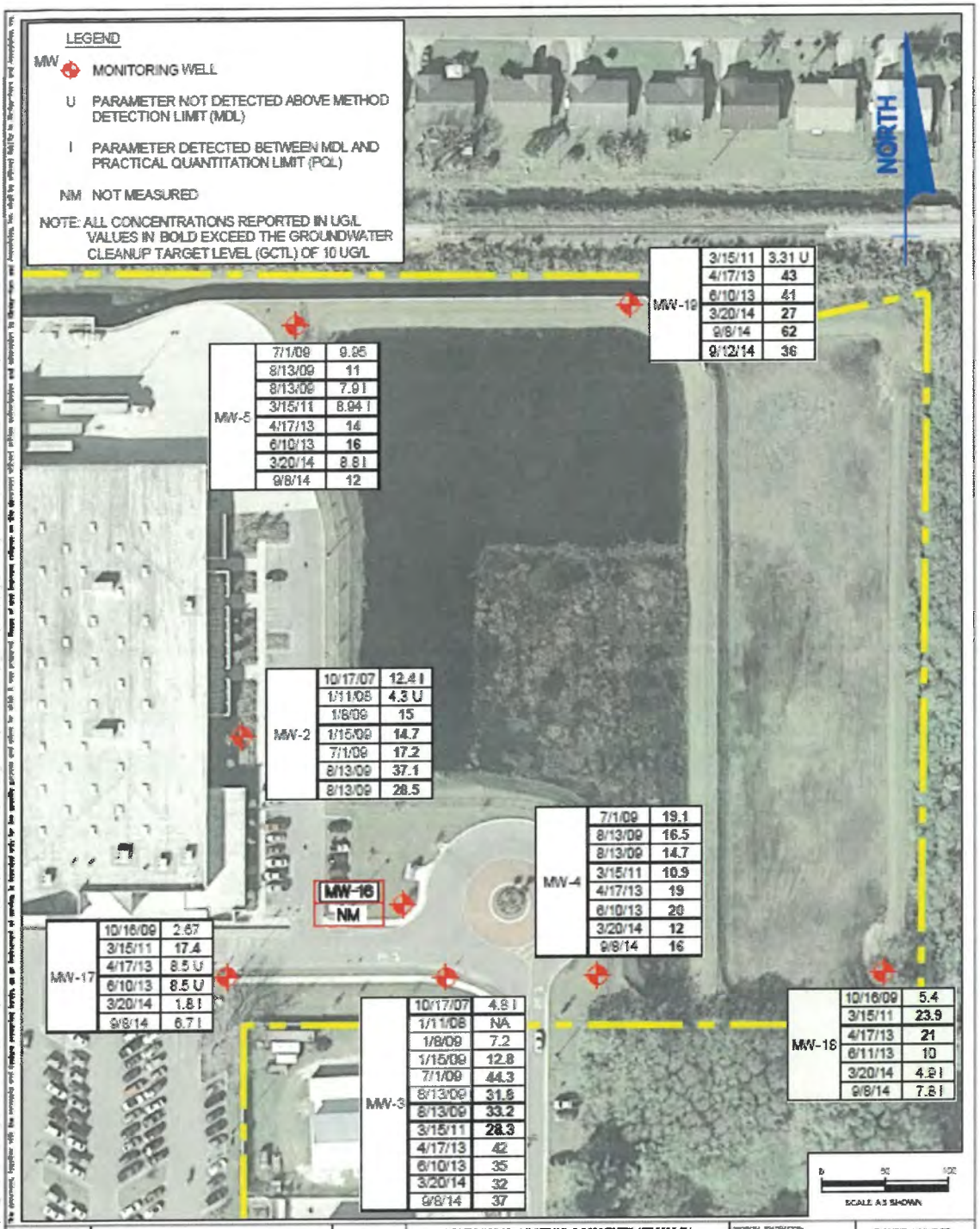
cc: Dalayna Tillman, Esq. – (via email: DTillman@Goldsteinenvlaw.com)

Exhibit 1 – Facility Location Map



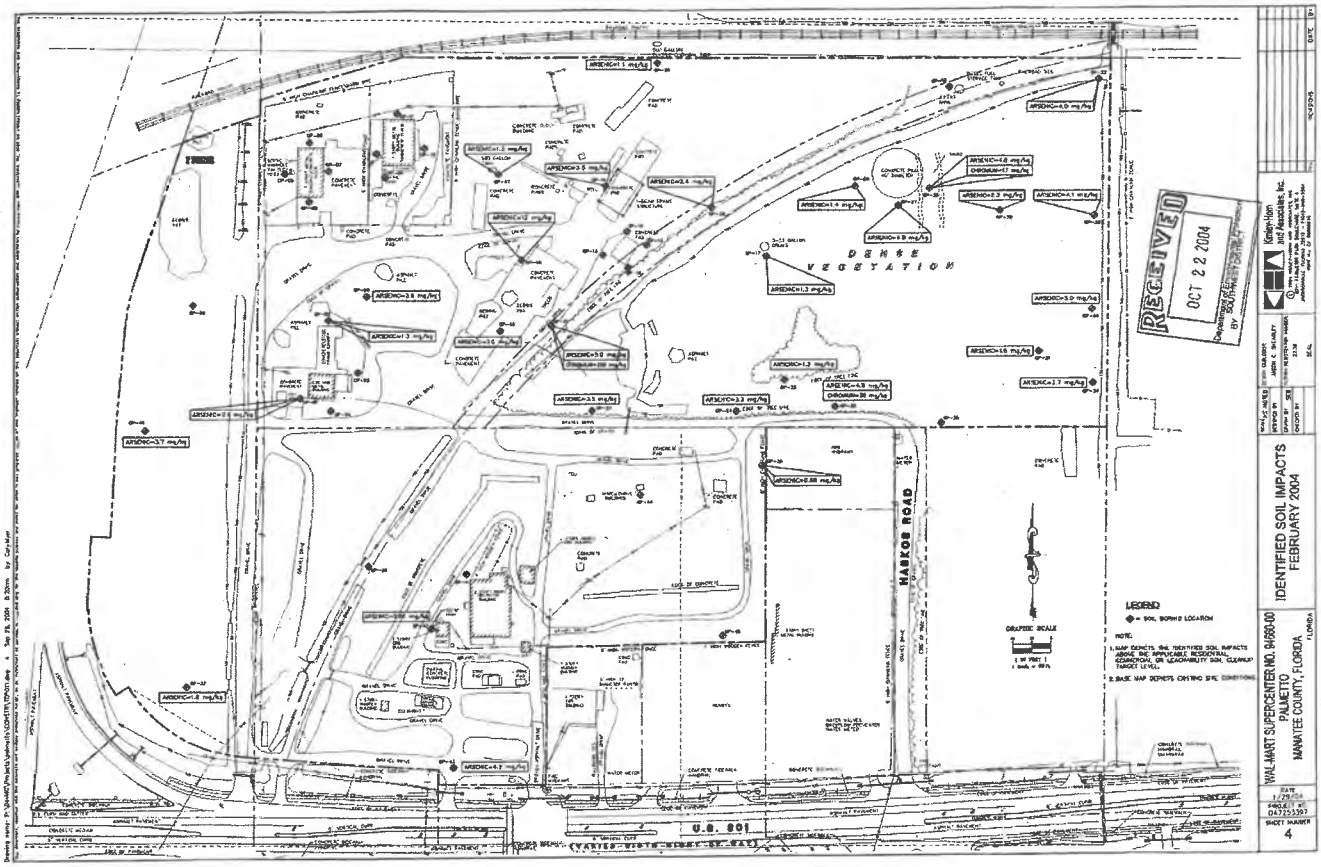
SCALE: AS NOTED DESIGNED BY: KPF DRAWN BY: CHECKED BY:	Kimley-Horn and Associates, Inc. 1917 PRINCESS PALM AVENUE, SUITE 305, TAMPA, FL 33610 PHONE: 813-620-1460 FAX: 813-620-1542 WWW.KIMLEY-HORN.COM CA 00000699	DATE 07/07/2009 PROJECT NO. 047253987	1987 USGS QUAD MAP PALMETTO, FL	WAL-MART PALMETTO STORE #3370-00	SHEET NUMBER 1 of 1

Exhibit 2 – Contamination Site Location Maps



Drawing Name: K:\MX_Environmental\Wal-Mart Environmental\Wal-Mart Palmetto\2014\Groundwater Monitoring 2014\Maps\2014\Figures\CADD\Figure 3.dwg FIGURE 3 Sep 22, 2014 8:33pm bys: leah.brennan

SCALE: AS NOTED DESIGNED BY: D.S.G DRAWN BY: L.M.Z. CHECKED BY: D.S.G	Kimley»Horn © 2014 KIMLEY-HORN AND ASSOCIATES, INC. 8857 BAYPINE ROAD, SUITE 360, JACKSONVILLE, FL 32256 PHONE: 904-828-3900 FAX: 904-357-1982 WWW.KIMLEY-HORN.COM CA 00000695	DATE: SEPT. 2014 PROJECT NO.: 04725.3987	**HISTORICAL ARSENIC CONCENTRATIONS IN GROUNDWATER** FOR WALMART PALMETTO STORE NUMBER 3370	DESIGN ENGINEER: DAVID DELDMAN, P.G FLORIDA P.E. LICENSE NUMBER: FL 1573 DATE:	FIGURE NUMBER 3


RECEIVED
OCT 22 2004
DENSE VEGETATION
HARKOS ROAD
U.S. 301
LEGEND
NOTE:
1. MAP DEPICTS SOIL IDENTIFIED SOIL IMPACTS ABOVE THE APPLICABLE RESIDENTIAL, COMMERCIAL OR LEACHABILITY SOIL CLEANUP TARGET LEVEL.
2. BASE MAP DEPICTS EXISTING SITE CONDITIONS
GRAPHIC SCALE
IDENTIFIED SOIL IMPACTS
FEBRUARY 2004
WAL-MART SUPERCENTER NO. 04660-00
PALMETTO
MANATEE COUNTY, FLORIDA
SHEET NUMBER
4

Florida Department of Environmental Protection
Twin Towers Office Bldg. 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400
Division of Waste Management
Petroleum Storage Systems
Storage Tank Facility Routine Compliance Site Inspection Report

Facility Information:

Facility ID: 9815770 County: MANATEE Inspection Date:08/22/2024
Facility Type: C - Fuel user/Non-retail
Facility Name: WALMART SUPERCENTER #3370
508 10TH ST E
PALMETTO, FL 34221-4062
# of inspected ASTs: 1
USTs: 0
Mineral Acid Tanks: 0
Latitude: 27° 31' 25.7232"
Longitude: 82° 33' 33.2352"
LL Method: DPHO

Inspection Result:

Result: In Compliance

Signatures:

TKMNEM - MANATEE-HILLSBOROUGH COUNTY ENVIRO PROT COMM (813) 627-2600

Storage Tank Program Office and Phone Number

Vincent Shanberg
Inspector Name



Inspector Signature
Principal Inspector

MANATEE-HILLSBOROUGH COUNTY ENVIRO PROT COMM

Garrett Owen
Representative Name

No Signature
Representative Signature

Power Secure

Emailed to Rachel Barton 08/29/24
Representative Name

No Signature
Representative Signature

Walmart

Emailed to Anna Stoddard 08/29/24
Representative Name

No Signature
Representative Signature

Power Secure

Owners of UST facilities are reminded that the Federal Energy Policy Act of 2005 and 40 CFR 280 Subpart J requires Operator Training at all facilities by October 13, 2018. For further information please visit: https://floridadep.gov/waste/permitting-compliance-assistance/content/underground-storage-tank-operator-training

Financial Responsibility:

Financial Responsibility: INSURANCE

Insurance Carrier: INDIAN HARBOR INSURANCE COMPANY

Effective Date: 05/01/2024 Expiration Date: 05/01/2025

Completed System Tests

Type	Date Completed	Results	Reviewed	Next Due Date	Comment
Annual Operability - Overfill Protection	07/30/2024	Passed	08/29/2024	07/31/2025	Test performed monthly by Power Secure
Annual Operability - Release Detection	07/30/2024	Passed	08/29/2024	07/31/2025	Test performed monthly by Power Secure

Reviewed Records

Record Category	Record type	From Date	To Date	Reviewed Record Comment
Three Years	Certificate of Financial Responsiblity	05/01/2022	08/22/2024	
Three Years	Monthly Maint. Visual Examinations and Results	08/16/2021	07/30/2024	

Inspection Comments

08/22/2024
08/22/24 Met onsite with Garrett Owen with Power Secure for the storage tank compliance inspection.

RECORDS: #9815770, 08/22/2024

Placard: #677384; issued 06/04/2024, 1 tank listed.

Financial Responsibility: Indian Harbor Insurance: 05/01/2024 to 050/1/2025. Coverage also provided for 05/01 /2022 to 05/01/2023 and 05/01/2023 to 05/01/2024.

CoFR: Available with FR.

Release Detection:

a. This Facility has the following release detection methods:
1. Visual inspection of tank and equipment, electronic gauging of tank interstice.

b. Facility monthly release detection results:
1. Reviewed the monthly visual inspection records from 08/21/2021 to 07/29/2024 were provided. All inspections were performed at least once per month within 35 days apart.

Tests:

1. The annual operability test of the interstitial sensor provided was performed on 07/29/2024 by Power Secure Inc. and performed on a monthly basis. All passed. The next tests are due by 07/29/2025.

2. The annual operability test of the overfill protection devices was performed on 07/29/2024 by Power Secure, Inc. and performed on a monthly basis. All passed. The next tests are due by 07/29/2025.

PHYSICAL:

Tank and equipment: The tank, fill and equipment are in good condition. All signage in place.

NOTE: Inspection is for the sub-base generator tank. Used oil AST at the same location is under Facility #9807991.

Inspection Photos

Added Date 08/29/2024

98815770_Tank field_8-22-24



Florida Department of Environmental Protection
Twin Towers Office Bldg. 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400
Division of Waste Management
Petroleum Storage Systems
Storage Tank Facility Closure Site Inspection Report

Facility Information:

Facility ID: 9807991 County: MANATEE Inspection Date:11/14/2025
Facility Type: J - Collection Station
Facility Name: WAL-MART SUPERCENTER #3370
508 10TH ST E
PALMETTO, FL 34221
Latitude: 27° 31' 19.17"
Longitude: 82° 33' 34.82"
LL Method: DPHO

# of inspected ASTs: 1
USTs: 0
Mineral Acid Tanks: 0

Inspection Result:

Result: In Compliance

Signatures:

TKMNEM - MANATEE-HILLSBOROUGH COUNTY ENVIRO PROT COMM (813) 627-2600

Storage Tank Program Office and Phone Number

Vincent Shanberg

Inspector Name



Inspector Signature
Principal Inspector

MANATEE-HILLSBOROUGH COUNTY ENVIRO PROT COMM

Emailed to Skip Zabel

Representative Name

No Signature

Representative Signature

Reynalds Brothers

Emailed to Sally Knight

Representative Name

No Signature

Representative Signature

APTIM

Owners of UST facilities are reminded that the Federal Energy Policy Act of 2005 and 40 CFR 280 Subpart J requires Operator Training at all facilities by October 13, 2018. For further information please visit: https://floridadep.gov/waste/permitting-compliance-assistance/content/underground-storage-tank-operator-training

Financial Responsibility:

Financial Responsibility: INSURANCE

Insurance Carrier: INDIAN HARBOR INSURANCE COMPANY

Effective Date: 05/01/2025 Expiration Date: 05/01/2026

Inspection Comments

11/14/2025
Facility ID#: 41 / 9807991
Facility Name: WAL-MART SUPERCENTER #3370
Inspection date: 11/14/2025
Closure Inspection Field Notes

SITE VISITS:

11/14/2025 - Vincent Shanberg on-site at 10:00 am

Contractor:
Reynalds Brothers
555 Columbia Dr.
Carrollton, GA 30117
Phone:770-284-5770

Contact: Skip Zabel
Permit and Project Support.
Reynalds Brothers
Cell: 405-640-3517

Environmental Consultant:

Not required.

Storage tank systems and system components not in contact with the soil do not require a Closure Integrity Evaluation.

A Limited Closure Report Form for ASTs, incorporated by reference in subsection 62-762.421(2), F.A.C., shall be submitted in writing or electronic format to the county within 60 days of completion of the closure. A limited closure was provided on 11/21/2025 by Sally Knight with APTIM.

Financial Responsibility: Indian Harbor Insurance: 05/01/2025 to 05/01/2026.

Activities:

The facility has removed the 800-gallon DW AST. Notification was properly received.

Tank was emptied on 11/11/2025 and removed from original location to outside the service area. There was no history of release or contact with soil throughout the life of the system. The tank location is clean and dry with no visible cracks on the floor.

Tank was in incompliance during the 07/11/2022 inspection.

The tank was scarped and a receipt sent on 11/21/2025

CLOSURE INSPECTION ONLY. Certain records and equipment associated with routine compliance inspections were not checked.

Attachment Documents

- 9807991 Scap Ticket 11/17/2025

Inspection Photos

Added Date 12/09/2025

9807991 Removed tank 11-14-2025



Added Date 12/09/2025

9807991 Tank area 11-14-2025



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/24/2026 Last Data Refresh: 03/23/2026 Report Generated from DOPPLER

District	Southwest	**Type**	Fuel user/Non-retail
County	Manatee	**Status**	CLOSED
ID	9046950	**Latitude**	27° 31' 17.0261
Name	TAYLOR CONCRETE INC 503 10TH ST E PALMETTO, FL 34221-4062	**Longitude** **LL Method**	82° 33' 38.2853 DPHO
Contact		**LL Status**	REVIEWED
Phone	(941) 286-1722	**Status Date**	07/14/2006

Account Owner Information

Name	TAYLOR CONCRETE INC PO BOX 86 PALMETTO, FL 34220-86	**Effective Date**	09/17/1990
Contact	NATHAN J TAYLOR JR		
Phone	(813) 722-2861		
Email		**Placard # / Date**	

No Property Owner Information Found

Tank	Tank Size	Content	Installed	Placement	Status
1	1000	Unleaded Gas (B)	05/01/1994	ABOVEGROUND	Removed from Site (B)

Constructions
(C) Steel
(K) AST containment

Pipings
(A) Abv, no soil contact

Monitorings
(Q) Visual inspection of ASTs

Tank	Tank Size	Content	Installed	Placement	Status
2	750	Vehicular Diesel (D)	05/01/1994	ABOVEGROUND	Removed from Site (B)

Constructions	Pipings	Monitorings
(C) Steel (K) AST containment	(A) Abv, no soil contact	(Q) Visual inspection of ASTs

Insurance Documents

FR Type	Effective Date	Expiration Date	Company Name
INSURANCE	10/05/1998	10/05/1999	FPLIPA

No System Tests Found

No Legacy Data Found

No Compliance Activity Data Found

No Open AOCs Found

No Open Violations Found

No Discharges Found

Florida Department of Environmental Protection

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form # 62-761.900(2)
Form Title Storage Tank Registration Form
Effective Date: July 13, 1998
DEP Application No. _____ (Filled in by DEP)

Storage Tank Facility Registration Form

DATA ENTERED OCT 0 1999 SF

Submit a completed form for the facility when registration of storage tanks or compression vessels is required by Chapter 376.303, Florida Statutes.

Please review *Registration Instructions* before completing the form.

Please check all that apply	[ ] New Registration	[ ] New Owner	[ ] New Tanks
	[ ] Facility Info Update/Correction	[ ] Owner Info Update/Correction	[X] Tank Info Update/Correction

A. FACILITY INFORMATION

County: Manatee DEP Facility ID: 41904695O

41904695O

Facility Name: Taylor Concrete Inc.

Facility Address: 502 10th St. E City: Palmetto Zip: _____

Facility Contact: Nathan Taylor Business Phone: (___) _____

Facility Type(s): _____ NAICS Code: _____ Financial Responsibility: _____

24 Hour Emergency Contact: _____ Emergency Phone: (___) _____

B. RESPONSIBLE PERSON INFORMATION - Identify individual(s) or Business(es) responsible for storage tank management, fueling operations, and/or cleanup activities at the facility location named above. Provide additional information in an attachment if necessary.

Name:	Facility - Responsible Person Relation Type:	Effective Date
Mail address:	[ ] Facility Account Owner (pays fees)	
City, ST, Zip:	Facility Account Owner information must be provided when the facility contains active (in-use) storage tanks on site.	
Contact:		
Telephone:	STCM Account Number (if known)	
Identify other appropriate facility relationships for this party: [ ] Facility Owner/Operator [ ] Property Owner [ ] Storage Tank Owner		

Name:	Other owner, relationship type(s)	Effective Date
Mail address:	[ ] Facility Owner/Operator	
City, ST, Zip:	[ ] Property Owner	
Contact:	[ ] Storage Tank Owner	
Telephone:	[ ] Other:	

C. TANK/VESSEL INFORMATION - Complete one row for each storage tank or compression vessel system located at this facility.

Tank ID	T/V	A/U	Capacity	Installed	Content	Status/Effective Date		Construction	Piping	Monitoring
1		A	1000	5/94	D	B	9/99	CK	A	Q
2		A	750	5/94	D	B	9/99	CK	A	Q

Certified Contractor (performing tank installation or removal): _____ DBPR License No.: _____

Registration Certification: To the best of my knowledge and belief, all information submitted on this form is true, accurate, and complete.

Diana E. Taylor V.P. — Printed Name & Title

Diana E. Taylor — Signature

9-29-99 — Date

Northwest District
160 Governmental Center Blvd.
Pensacola, FL 32501
850-595-8360

Northeast District
7825 Baymeadows Way,
Suite B200
Jacksonville, FL 32256
904-448-4300

Central District
3319 Maguire Blvd.,
Suite 232
Orlando, FL 32803
407-894-7555

Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619
813-744-6100

Southeast District
400 North Congress Ave.,
W Palm Beach, FL 33416
561-681-6600

South District
2295 Victoria Ave.,
Suite 364
Fort Myers, FL 33901
941-332-6975

Marathon Branch Office
2796 Overseas Hwy.,
Suite 221
Marathon, FL 33050
305-289-2310

Florida Department of Environmental Protection

Memorandum

DATE: August 9, 1999

TO: Larry Morgan
Office of General Counsel

THROUGH: William Kutash, Program Administrator WK
Division of Waste Management

Laurel Culbreth, Environmental Manager LC

FROM: Maura Sweeney, Environmental Specialist MVS

SUBJECT: Case Closure Request

Below is a list of enforcement cases within the Southwest District's Storage Tank Program that were previously requested to be closed in LCTS. These facilities have met the conditions of the enforcement case. Please close these cases in LCTS. I am forwarding a copy of the initial requests for your files. Thank you for your assistance.

Taylor Concrete, Inc. OGC Case #98-2722
Fina Station- Webber's OGC Case #98-2415

Florida Department of Environmental Protection

Memorandum

SOUTHWEST DISTRICT

TO: Larry Morgan
Office of General Counsel

THROUGH: William Kutash, Program Administrator
Division of Waste Management

Laurel Culbreth, Environmental Specialist III

FROM: Jon H. Reeder, Environmental Specialist II

DATE: October 7, 1998

SUBJECT: FINA Station - Webber's / Polk County
AKA Webber Auto Repair
801 Cypress Gardens Boulevard, SE
Winter Haven, FL

Facility ID: #53/8624348
OGC Case: #98-2415

Case Closure Request

All provisions of the subject Short Form Consent Order have been met. Therefore, it is requested that this case be closed.

Amount of penalties, costs, and expenses: $3,100 ($3000.00 penalties & $100.00 costs)

JHR

Florid Department of
Environmental Protection

Memorandum

SOUTHWEST DISTRICT

TO: Larry Morgan
Office of General Counsel

THROUGH: William Kutash, Program Administrator
Division of Waste Management

Laurel Culbreth, Environmental Manager

FROM: Leslie Pedigo, Environmental Specialist

DATE: November 20, 1998

SUBJECT: Taylor Concrete, Inc.
502 10th Street East
Palmetto, Manatee County

OGC Case NO.: 98-2722

Case Closure Request

All provisions of the subject Consent Order have been met; therefore, it is requested the case be closed.

Amount of penalty assessed $1760.00

LELP

Memorandum

Florida Department of Environmental Protection

ENFORCEMENT/COMPLIANCE COVER MEMO

TO: Richard Garrity, DDM
William Kutash, ENV. ADM.
___ OGC, ATTN: _____

FROM/THROUGH: _____, **PROGRAM ADMINISTRATOR**
Laurel Culbreth, **ENVIRONMENTAL MANAGER**
Leslie Pedigo, **ENVIRONMENTAL SPECIALIST I**

DATE: November 19, 1998

FILE NAME: Taylor Concrete, Inc. **OGC CASE No.:** 98-2722
PROGRAM: Tanks **COUNTY:** Manatee **PROJECT NUMBER:** 201326

TYPE OF DOCUMENT:

Case Closure Letter

DESCRIPTION OF VIOLATION:

Failure to provide financial responsibility for ASTs

SUMMARY OF CORRECTIVE ACTIONS:

Pay penalty and cost and expenses, entire amount paid 11/18/98

PENALTY SUMMARY:

EXTENT OF DEVIATION minor **POTENTIAL FOR HARM** major
MODIFIERS: N/A
PENALTY AMOUNT: $1660.00 **COST AND EXPENSES:** $100

TOTAL PENALTY AMOUNT: $1760.00 **BY SECRETARY:** N/A

Memorandum

Florida Department of
Environmental Protection

SOUTHWEST DISTRICT

TO: Larry Morgan
Office of General Counsel

THROUGH: William Kutash, Program Administrator
Division of Waste Management

Laurel Culbreth, Environmental Manager

FROM: Leslie Pedigo, Environmental Specialist

DATE: November 20, 1998

SUBJECT: Taylor Concrete, Inc.
502 10th Street East
Palmetto, Manatee County

OGC Case NO.: 98-2722

Case Closure Request

All provisions of the subject Consent Order have been met; therefore, it is requested the case be closed.

Amount of penalty assessed $1760.00

LELP

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

November 20, 1998

Mr. Nathan Taylor
Taylor Concrete, Inc.
502 10th Street East
Palmetto, FL 34222

Re: Taylor Concrete, Inc.
502 10th Street East
Palmetto, Manatee County, Florida
Facility ID #419046950
OGC Case No.: 98-2722

Dear Mr. Taylor:

The Department acknowledges that Taylor Concrete, Inc., has complied with the specific conditions in the above referenced Consent Order. The Department, therefore, is closing its enforcement case on this matter.

Your cooperation was appreciated.

Sincerely,

William Kutash
Program Administrator
Division of Waste Management

WK/lp

cc: Paul Panik, Manatee County EMD

```
AREA: SWD_____        Cash Receiving Application                    CRAF006A
                  Collection Point Log Remittance      Tot: _____$1,760.00
+-------------------------------------------------------------------------+
| SYS$REMT: 294568__ Type: CP___    Recved Date: 18-NOV-1998  Status: RECEIVED
| SYS$RCPT: 241337__ PNR: _______ Check #: 46174_____ Amount: _____1,760.00
| SSN/FEI#: _________             Name: TAYLOR_CONCRETE_INC_____________
|   First: ____________________ Middle: _____ Title:_______ Suf: _____
| Address1: P.O._BOX_86_____________________________ Short Comments:
| Address2: _____________________________OGC98-2722___ L-ECOSYS/PENALTY_____
|   City: PALMETTO_____________ ST: FL  Zip: 34220-____ Country: _________
+-------------------------------------------------------------------------+
+-------------------------> P A Y M E N T (S) <---------------------------+
|          Distr                                                          S
|          CL      Object                      Payment                Applic/    T
| SYS$PAYT Area..  Code/Description.....:      Amount.....  Reference#     Fund   A
| 306987__ SWD___  012008 LCT-PENALTIES__      _____$1,660.00 OGC98-2722 ___ ECOSYS CO
| 306988__ SWD___  018003 LCT-REIMB.LEGAL      _______$100.00 OGC98-2722 ___ ECOSYS CO
| _______ ______ ______ ____________________ _____________ ___ ____________ __
| _______ ______ ______ ____________________ _____________ ___ ____________ __
| _______ ______ ______ ____________________ _____________ ___ ____________ __
+-------------------------------------------------------------------------+
 COMMIT FREQUENTLY                    _____$1,760.00  Payment total
Press_<TAB>_to_accept_Collection_Point_or_enter_F&A._____________________
Count: *1                                                      <Replace>
```



TAYLOR CONCRETE, INC.

P.O. BOX 86 PALMETTO, FL 34220
(813) 722-2861

RECEIVED
NOV 18 1998
DEP

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

August 12, 1999

Mr. Gene Adkins
Gene's Truck Service
503 10th Street E.
Palmetto, Florida 34208

Re: Non-notifier, FLR 000 051 607

Dear Mr. Adkins:

Thank you for your assistance during the RCRA compliance inspections conducted on December 18, 1998 and July 28, 1999.

Enclosed is the inspection report generated from this visit. Based upon the information gathered from this inspection, Gene's Truck Service was found to be in violation of RCRA regulations governing conditionally exempt small quantity generators, as well as state solid waste regulations. These violations are set forth in the "Summary of Violations" section of the inspection report.

Subsequent review of documentation provide by you and a follow up inspection on July 28, 1999, indicates that all the violations cited in the "Summary of Violations" have been corrected. Having returned to compliance, no enforcement action will be taken.

Your continued cooperation is appreciated. If you have any question please call me at (813) 744-6100, extension 373.

Sincerely,

Robert Sellers

Robert Sellers
Environmental Specialist
Division of Waste Management

RS/rs

Enclosure
cc: Morgan Leibrandt, FDEP
Peter Mitchell, Manatee County
Compliance File

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒Routine ☐Complaint ☐Follow-Up ☐Permitting ☐Pre-Arranged

FACILITY NAME Gene's Truck Service EPA ID # FLR 000 051 607

STREET ADDRESS 503 10th St. E. , Palmetto, FL 34208

MAILING ADDRESS Same

COUNTY Manatee PHONE 941/723-0083 DATE 12/18/98 TIME 1100

NOTIFIED AS: ☒ N/A	*CURRENT STATUS*:
☐ Non Handler	☐ Non Handler
☐ CESQG (<100 kg/mo.)	☒ CESQG (<100 kg/mo.)
☐ SQG (100-1000 kg/mo.)	☐ SQG (100-1000 kg/mo.)
☐ Generator (>1000 kg/mo.)	☐ Generator (>1000 kg/mo.)
☐ Transporter	☐ Transporter
☐ Transfer Facility	☐ Transfer Facility
☐ Interim Status TSD Facility	☐ Interim Status TSD Facility
☐ TSD Facility	☐ TSD Facility
Unit Type(s):	Unit Type(s):
☐ Exempt Treatment Facility	☐ Exempt Treatment Facility
☐ Used Oil:	☒ Used Oil: Generator

2. **APPLICABLE REGULATIONS:**

☒ 40 CFR 261.5	☐ 40 CFR 262	☐ 40 CFR 263	☐ 40 CFR 264
☐ 40 CFR 265	☐ 40 CFR 266	☐ 40 CFR 268	☐ 40 CFR 273
☒ 40 CFR 279	☒ 62-710, FAC	☐ 62-737, FAC	☐ 62-740, FAC

3. **RESPONSIBLE OFFICIAL(s):**

Gene Adkins, Owner

4. **INSPECTION PARTICIPANTS:**

Robert Sellers, FDEP Paul Meador

5. **LATITUDE/LONGITUDE** 27° 29' 40" 82° 33' 13"

6. **SIC Code:** 7538

7. **TYPE OF OWNERSHIP:** Private Federal State County Municipal

8. **PERMIT #:** N/A **ISSUE DATE:** **EXP. DATE:**

9. PROCESS DESCRIPTION:

Gene's Truck Service is a truck and automobile engine repair business, servicing both gasoline and diesel engines. The facility consists of one large building, a large concrete pad and a small trailer used for office space.

The facility was inspected jointly with the Manatee County Environmental Management Department upon the request Peter Mitchell. Mr. Mitchell had reason to believe that a large amount of solid waste had been buried on the property and that several drums of used oil may have also been buried. An anonymous tip to his department stated that a 30-foot pit had been dug on site and that a large amount of trash, auto parts and used oil had been buried.

Fresh soil and sand at the right rear of the building did indicate that a large pit had been dug at the site. Mr. Adkins, the facility owner, was not present at the time of the inspection, but later admitted that a large amount of trash had been dumped on his property and that he had buried it in the pit, a violation of **62-701.300(1)(a) F.A.C.** The debris was excavated and properly disposed of subsequent to the December 18, 1998 inspection.

The facility generates minor amounts of hazardous waste in the form of mineral spirits used in their parts washing machine. This fluid is mixed with the facility's used oil, which is acceptable because the facility is a conditionally exempt small quantity generator of hazardous wastes.

Used oil is picked up by A&S Oil Service, but no records were on hand. Information supplied by A&S indicated that the facility has not had a pick up since April 17, 1998. At that time, 3 drums of filters were picked up, but used oil was not picked up at that time. The facility had 5 – 55 gallon drums of used oil on hand at the time of inspection, and much more stored in 5-gallon buckets inside the work area. Drums of used oil were not labeled with the words "used oil", a violation of **40 CFR 279.22(c)(1)**. Drums used to store used oil filters were not labeled with the words "used oil filters", a violation of **62-710.850 F.A.C.**

Used batteries are exchanged for recycling upon the delivery of new batteries from Leep Battery.

Fire and spill control equipment and supplies were on hand and were adequate. Fire extinguishers are inspected on an annual basis.

Mr. Adkins was advised that disposal records should be kept a minimum of three years and should be kept at the facility.

10. SUMMARY OF ALLEGED VIOLATIONS:

40 CFR 279.22(c)(1)	Failure to label or mark containers used to store used oil with the words "Used Oil."
62-710.850(6), F.A.C.	Failure to label containers used to store used oil filters with the words "Used Oil Filters."
62-701.300(1)(a), F.A.C.	Failure to dispose of solid waste to a permitted solid waste management facility.

11. RECOMMENDATIONS:

40 CFR 279.22(c)(1)	The facility has provided the appropriate information and documents to the Department subsequent to the inspection. No further action is necessary.
62-710.850(6), F.A.C.	The facility has provided the appropriate information and documents to the Department subsequent to the inspection. No further action is necessary.
62-701.300(1)(a), F.A.C.	The facility has removed buried debris and disposed of it properly. No further action is necessary.

Report prepared by: Robert Sellers Date 16 AUG 99
Robert Sellers
Environmental Specialist I

Approved by: _____ Date 8/18/99
Elizabeth Knauss
Environmental Manager

USED OIL GENERATOR CHECKLIST

Facility Name: GENE'S TRUCK Service Date: 18 Dec 98

Facility Representative: GENE ADKINS Facility ID #: FLR 000 051 607

SIC Codes: 7538 Inspector: BOB Sellers

40 CFR 279 Subpart C -- Generator Standards

1. Describe the facility's used oil streams:

WASTE DESCRIPTION	ON/Off Specification	Testing or Process Knowledge	Generation Rate	Disposal Facility and EPA ID
USED OIL	—	—		A+S Oil Recovery
USED OIL Filters	—	—		

2. Does the generator mix hazardous waste with the used oil?(279.10) Y ✓ N ____

3. If so, is the facility a CESQG? Y ✓ N ____

4. If not, is the oil mixed with a characteristic hazardous waste? Y ____ N ____ NA
(describe waste)

   If so, does the facility document that the resultant mixture does not exhibit any characteristic of hazardous waste? Y ____ N ____

   Or, if the hazardous waste is only D001, that the resultant mixture is not ignitable? Y ____ N ____

   If the facility is not a CESQG, and oil is mixed with a listed hazardous waste, it must be managed as a hazardous waste.

5. Does the facility generate other materials contaminated with used oil? Y ~~✓~~ N ✓

   If so, are the materials burned for energy recovery as used oil? Y ~~✓~~ N ____ NA

   or, Does the facility have records documenting the residuals are not hazardous waste? Y ____ N ____ ✓

6. Does the generator claim that the used oil meets the specification in 279.11? Y ____ N ✓

   If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H

Facility: Gene's Truck Service
Date: Dec. 98

Subpart C

1. Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units? Y ✓ N ____

   Are containers/tanks in good condition? (279.22(b)(1)) Y ✓ N ____

   Are containers/tanks leaking? (279.22(b)(2)) Y ____ N ✓

   Are containers/tanks storing used oil marked with the words "Used Oil", including fill pipes used to fill underground tanks? (279.22(c)) Y ____ N ✓

2. Are used oil filters stored in above ground containers which are: (62-710.850(6))

   In good condition? Y ✓ N ____

   Closed or otherwise protected from weather? Y ____ N ✓

   Labeled "Used Oil Filters"? Y ____ N ✓

   Stored on an oil impervious surface? Y ✓ N ____

3. Have any releases to the environment occurred, other than a leak from a UST? Y ✓ N ____

   If so, did the facility stop the release, contain the oil, clean up the release and manage the contaminated material properly and repair or replace the leaking units prior to returning them to service? (279.22(d)) Y ____ N ✓

4. Does the generator burn on site in a space heater? (279.23) Y ____ N ✓

   If so, does he burn only DIY oil or oil generated on site? Y ____ N ____ NA

   Does the heater have a capacity of no more than 0.5 million BTU/hr? Y ____ N ____

   Are combustion gasses vented to the atmosphere? Y ____ N ____

5. Does the generator only use transporters who have received EPA Identification numbers?

   Name and number Tim's Oil Service

6. If not, does the generator self-transport only used oil generated on site or DIY oil to used oil collection centers or aggregation point owned by the generator? Y ____ N ____ NA

   Name and location of center: ____

   Location of generator aggregation point: ____

   If so, is this only in vehicles owned by the facility or facility employees? Y ____ N ____

   Is no more than 55 gallons transported at one time? Y ____ N ____

7. Alternatively, does the generator have a tolling arrangement with a used oil reclaimer? Y ____ N ____

   Is a copy of the contract kept on site specifying

   type and frequency of shipments? Y ____ N ____

   that the transport vehicle is owned by the processor? Y ____ N ____

   that the reclaimed oil will be returned to the generator? Y ____ N ✓

CESQG CHECKLIST Date: 18 Dec 98

Facility Name: Gene's Truck Service Facility ID #: FLR 000 051607

Facility Representative: Gene Adkins Inspector: Bob Sellers

40 CFR 261.5

1. Describe the facility's hazardous and potentially hazardous waste streams. 40 CFR 262.11:

Waste	EPA Waste #s	Generation Rate	Disposal facility?	Proper Waste ID?
Mineral Spirits part washing Fluid	D018 D039 D040	8gal / 6mos	Tims Oil Service	

(describe discrepancies in waste identification in narrative)

Standards for Conditionally Exempt Small Quantity Generators - 40 CFR 261.5

2. Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous waste? Y✓ N___

   And less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes? Y✓ N___

3. Has the facility obtained an EPA ID #? (not required for CESQGs) Y___ N✓

4. Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? (40 CFR 261.5) Describe discrepancies in narrative. Y✓ N___

5. Can the facility document proper disposal of all hazardous wastes? 62-730.030(3) F. A. C. Y✓ N___

6. Are any hazardous wastes treated or disposed of on site? Describe in narrative: Y___ N✓

7. Are there any unpermitted discharges of other wastes to the environment? Y___ N✓

V

A&S OIL RECOVERY
OF FLA. INC.
1097 - 62nd Ter. So.
St. Pete, FL 33705
(727) 321-2602

FLD 991275314

[illegible] ORDER NO. 21174 DATE 8-2-99

NAME Gene's Auto Serv

ADDRESS 503 10 St Palmetto

SOLD BY	CASH	C.O.D	CHARGE	ON ACCT.	MDSE. RETD.	PAID OUT

QUAN.	DESCRIPTION	PRICE	AMOUNT
80g	used oil		N/C
	Robert A Sellers		
		Tax	
		Total	

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

67802 RECD BY _____

5R522 REDIFORM. carbonless

A&S OIL RECOVERY
OF FLA. INC.
1097 - 62nd Ter. So
St. Pete, FL 33705
(727) 321-2602

FLD 991275314

[illegible] ORDER NO. MANIFEST 21175 DATE 8-2-99

NAME Gene's Auto Serv

ADDRESS 503 10 ST Palmetto

SOLD BY	CASH	C.O.D	CHARGE	ON ACCT.	MDSE. RETD.	PAID OUT
			X			

QUAN.	DESCRIPTION	PRICE	AMOUNT
1 Drum	Used Filters		50 00
	Robert A Sellers		
		Tax	
		Total	50 00

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL

67922 RECD BY _____

5R522 REDIFORM. carbonless

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Genes Truck Service

On-Site Inspection Start Date: 02/18/2010 **On-Site Inspection End Date:** 02/18/2010

ME ID#: 39889 **EPA ID#:** FLR000051607

Facility Street Address: 503 10th St E, Palmetto, Florida 34219

Contact Mailing Address: 503 10th St E, Palmetto, Florida 34219

County Name: Manatee **Contact Phone:** (941) 729-1555

NOTIFIED AS:

N/A

INSPECTION TYPE:

Site Visit Inspection for Closed facility

INSPECTION PARTICIPANTS:

Principal Inspector: Rebecca Foster, Environmental Specialist II

Other Participants: None Available

LATITUDE / LONGITUDE: Lat 27° 31' 14.6247" / Long 82° 33' 39.9312"

SIC CODE: 7538 - Services - general automotive repair shops

TYPE OF OWNERSHIP: Private

Introduction:

A site visit was conducted at Genes Truck Service on February 18, 2010. The facility is no longer at this location. The HWY 41 overpass is now at this address and the building is now gone.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

Conclusion:

Genes Truck Service is a closed facility.

Inspection Date: 02/18/2010

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Rebecca Foster	Environmental Specialist II	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
Rebecca Foster	FDEP	2/23/2010
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

None Available
REPRESENTATIVE NAME

NO SIGNATURE
REPRESENTATIVE SIGNATURE

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Site No. 58

Manatee County School BD-Lincoln M S

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/23/2026 Last Data Refresh: 03/22/2026 Report Generated from DOPPLER

District	Southwest	**Type**	Local Government
County	Manatee	**Status**	OPEN
ID	8841898	**Latitude**	27° 31' 33.9707
Name	MANATEE CNTY SCHOOL BD-LINCOLN M S 1400 1ST AVE E PALMETTO, FL 34221-4027	**Longitude**	82° 33' 43.4311
		LL Method	DPHO
Contact	MANATEE CNTY SCHOOL BD	**LL Status**	REVIEWED
Phone	(813) 746-5171	**Status Date**	07/14/2006

Account Owner Information

Name	MANATEE CNTY SCHOOL BD PO BOX 9069 BRADENTON, FL 34206-9069	**Effective Date**	05/20/1994
Contact	FORREST BRANSCOMB OR EDDIE PONDER		
Phone	(941) 708-8770		
Email		**Placard # / Date**	

No Property Owner Information Found

Tank	Tank Size	Content	Installed	Placement	Status
2	2000	Fuel Oil - Onsite Heat (M)		UNDERGROUND	In Service (U)

Constructions
(D) Unknown

Pipings
(B) Steel/galvanized metal

Monitorings
(I) Not required

Tank	Tank Size	Content	Installed	Placement	Status

1	2000	Fuel Oil - Onsite Heat (M)	UNDERGROUND Removed from Site (B)

Constructions	Pipings	Monitorings
(D) Unknown	(B) Steel/galvanized metal	(I) Not required

No Insurance Documents Found

No System Tests Found

No Legacy Data Found

No Compliance Activity Data Found

No Open AOCs Found

No Open Violations Found

No Discharges Found

Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400

DER Form # 17-761.900(2)
Form Title Storage Tank Registration Form
Effective Date December 10, 1990
DER Application No. (Filled in by DER)

DATA ENTERED
APR 25 1995
LB

95 APR 24 PM 1:59
STORAGE TANK REGULATION

Storage Tank Registration Form

Please Print or Type - Review Instructions Before Completing Form

1. DER Facility ID Number: 41/8841898 — 2. Facility Type: C

3. New Registration ☐ New Owner Data ☐ Facility Revision ☐ Tank(s) Revision ☒

4. County and Code of tank(s) location: Manatee / 41

5. Facility Name: Lincoln Middle School
Tank(s) Address: 1400 1st Ave. E.
City/State/Zip: Palmetto / Florida / 34221-4027
Contact Person: Eddie Ponder Telephone: (____) ____

6. Financial Responsibility Type: D

7a. Tank(s) Owner: School Board of Manatee County
Owner Mailing Address: P.O. Box 9069
City/State/Zip: Bradenton / Florida / 34206-9069
Contact Person: Eddie Ponder Telephone: (813) 741-7314

DATA ENTERED
APR 25 1995
LB

7b. New Owner Signature/Change Date: ____ / ____ / ____

8. Location (optional) Latitude: __° __' __" Longitude: __° __' __" Section ____ Township ____ Range ____

Complete One Line For Each Tank At This Facility (Use Codes - See Instructions)

Complete 9 - 16 for tanks in use; 9 - 19 for tanks out of use

9	10	11	12	13	14	15	16	17	18	19
1	2000	M	XX	U	C	B	I	B	N/A	3/27/95

20. Jack Eubank — Certified Contractor*
DPR# PCC - 051757 — Department of Professional Regulation License Number*

*For new tank installation or tank removal

To the best of my knowledge and belief all information submitted on this form is true, accurate and complete.

Elizabeth S. Andrews
Enviro-Audit & Compliance, Inc.
Print name & title of owner or authorized person

Elizabeth S. Andrews
Signature

4/18/95
Date

Northwest District 160 Governmental Center Pensacola, Florida 32501-5794 904-436-8300
Northeast District 7825 Baymeadows Way, Suite B 200 Jacksonville, Florida 32207 904-798-4200
Central District 3319 Maguire Blvd. Suite 232 Orlando, Florida 32803-3767 407-894-7555
Southwest District 4520 Oak Fair Blvd. Tampa, Florida 33610-7347 813-623-5561
South District 2269 Bay St. Fort Myers, Florida 33901-2696 813-332-6975
Southeast District 1900 S. Congress Ave., Suite A West Palm Beach, Florida 33406 407-433-2650

Department of Environmental Regulation

Stationary Tank Registration/Notification Form

DATE RECEIVED
D.E.R.
87 DEC 24 AM 10: 30
BUREAU OF
WASTE MANAGEMENT

OCT 26 1989

Form 17-1.218(2)

BY: BB

(Mailing address information to be entered here)

1. Facility/Addressee name: _____

Facility address: _____

Mailing address: _____

NAME: Manatee School District
MAIL ADDRESS: P.O. Box 9069
CITY/STATE: Bradenton, Florida 34206-9069

FACILITY LOCATION
ADDRESS: Lincoln Middle
CITY/STATE: 1400 1st Avenue
Palmetto, Fl. 34221-4029

Use this form to comply with the following requirements of the Stationary Tank Rule Chapter 17-61, Florida Administrative Code.

1. Each owner or operator shall register the following with the department.
   a. All existing facilities by December 31, 1984. (Questions 1-19)
   b. All new storage systems or facilities at least 10 days prior to the start of installation of tanks except in the case of emergency replacement. (Questions 1-19)
   c. A non pollutant containing installation which is to be converted to a facility, at least 10 days prior to the placement of pollutants in such a facility. (Questions 1-19)
2. Each owner or operator shall notify the department of the following.
   a. All storage systems within 10 days of abandonment. (Questions 1-12, 16, 20)
   b. Facility sale within 10 days of sale. Notice shall be made by the seller. (Answer questions 1-7, and 11. Question 7 about the new owner.)
   c. Retrofitting within 10 days of completion. (Questions 1-19)
3. You may notify the department of a change of operator. (Questions 1-6)

Agency Use Only

PLEASE PRINT OR TYPE

2. Facility number (DER will provide this number) 48841898
3. Date 12/15/87
4. Federal Employment Identification (number used to file IRS forms) [redacted]
5. County Code (see enclosed letter): 41
6. Operator of facility: Manatee School District
   Effective date (only for change of operator): N/A
   Telephone number: (813) 746-5171
7. Company/Person owning tanks and piping: Manatee School District
   Address: 215 Manatee Ave. W., Bradenton, Florida
   Contact person: Arnold Wilhoite
   Telephone number: 813 748-2090
   Effective date (only for change of owner): _____
8. How many tanks at this location have an individual storage capacity of greater than 550 gallons and store vehicular fuel made from petroleum?
   2 Underground _____ Aboveground
9. Facility location: Latitude 27 ° 31 33- Longitude: 82 ° 33 · 43- Section 13 Township 34S Range 17E
   This information is listed on property deeds, and in the offices of the property appraiser and tax assessor.
10. Sketch the facility on a separate page showing the APPROXIMATE location of buildings, tanks, and dispensers.
    A. Draw a line from tank to dispenser to show which are connected by piping.
    B. Label each tank as Tank 1, Tank 2, etc.
    C. Write the date and your facility number, if known, or name and address exactly as it appears above.
    D. Keep a copy of your sketch.

REFER TO TANKS BY THESE LABELS IN ANY COMMUNICATION WITH THE DEPARTMENT
DESCRIBE PIPING BY THE NUMBER OF THE TANK IT IS ATTACHED TO

11. TO THE BEST OF MY KNOWLEDGE AND BELIEF ALL INFORMATION SUBMITTED ON THIS FORM IS TRUE, ACCURATE, AND COMPLETE

Manatee School District - Arnold Wilhoite
Name of owner, operator or authorized representative

Signature of owner, operator or authorized representative

KEEP A COPY OF THIS FORM FOR YOUR RECORDS

MAIL TO: DER Stationary Tank Registration
2600 Blair Stone Road
Room 603
Tallahassee, Florida 32301

INSTRUCTIONS: Use one row across for each tank counted in question 8. The tank number must agree with the number on the sketch of your facility. A new tank installed where a registered tank was removed should be given the number of the removed tank with an R and a number added. Example: Tank 3R1 is first replacement for tank 3. It is in the same place where tank 3 was; Tank 3R2 is the second replacement for tank 3. Attach extra pages if necessary. Write your facility number, if known, or name and address, exactly as it appears on the front of the form, on all extra pages.

(12) Tank Number	(13) Tank Size in Gallons	(14) Tank Contents (see List 14 below)	(15) Tank Installation Date, Month/Year (put X if unknown)	(16) Underground or Aboveground Tank (write U or A)	(17) Tank Construction Specifics (see List 17U or 17A below)	(18) Integral Piping System Construction Specifics (see List 18 below)	(19) Monitoring System Type (see List 19)	(20) Tank Disposal Method (see List 20)
1	2,000	~~Z~~ M	X	U	D	B	N	N/A
2	2,000	~~Z~~ M	X	U	D	B	N	N/A

ENTER THE LETTERS WHICH APPLY TO EACH TANK IN THE BOXES ABOVE. WRITE ALL THAT APPLY.

List 14

Tank contents are:

A. leaded gasoline.
B. unleaded gasoline.
C. Alcohol enriched gasoline.
D. diesel fuel.
E. aviation fuel.
Z. other.

List 17U
UNDERground Tanks

Underground tank:

A. has overfill protection.
B. is interior lined.
C. is painted/asphalted steel.
D. is of unknown type.
E. is fiberglass type.
F. is fiberglass-clad steel.
G. is sacrificial anode type.
H. is impressed current type.
I. is double walled.
J. is concrete.
K. is in secondary containment.
N. is or has none of the above.

List 17A
ABOVEground Tanks

Aboveground tank:

O. has overfill protection.
P. is surrounded by impervious dike.
Q. is surrounded by earth dike.
R. rests on an impervious base.
S. rests on a earth/gravel base.
T. has interior lined bottom.
U. is cathodically protected.
V. is built of/coated with corrosion resistant materals.
W. is supported above the soil.
Z. is or has none of the above.

List 18

Integral Piping System has:

A. no parts in contact with the soil.

Parts contacting the soil which are:

B. unprotected metal.
C. built of corrosion resistant materials.
D. corroson resistant coated.
E. cathodically protected.
F. double-walled.
G. within a secondary containment.
H. interior lined.
M. none of the above.

List 19

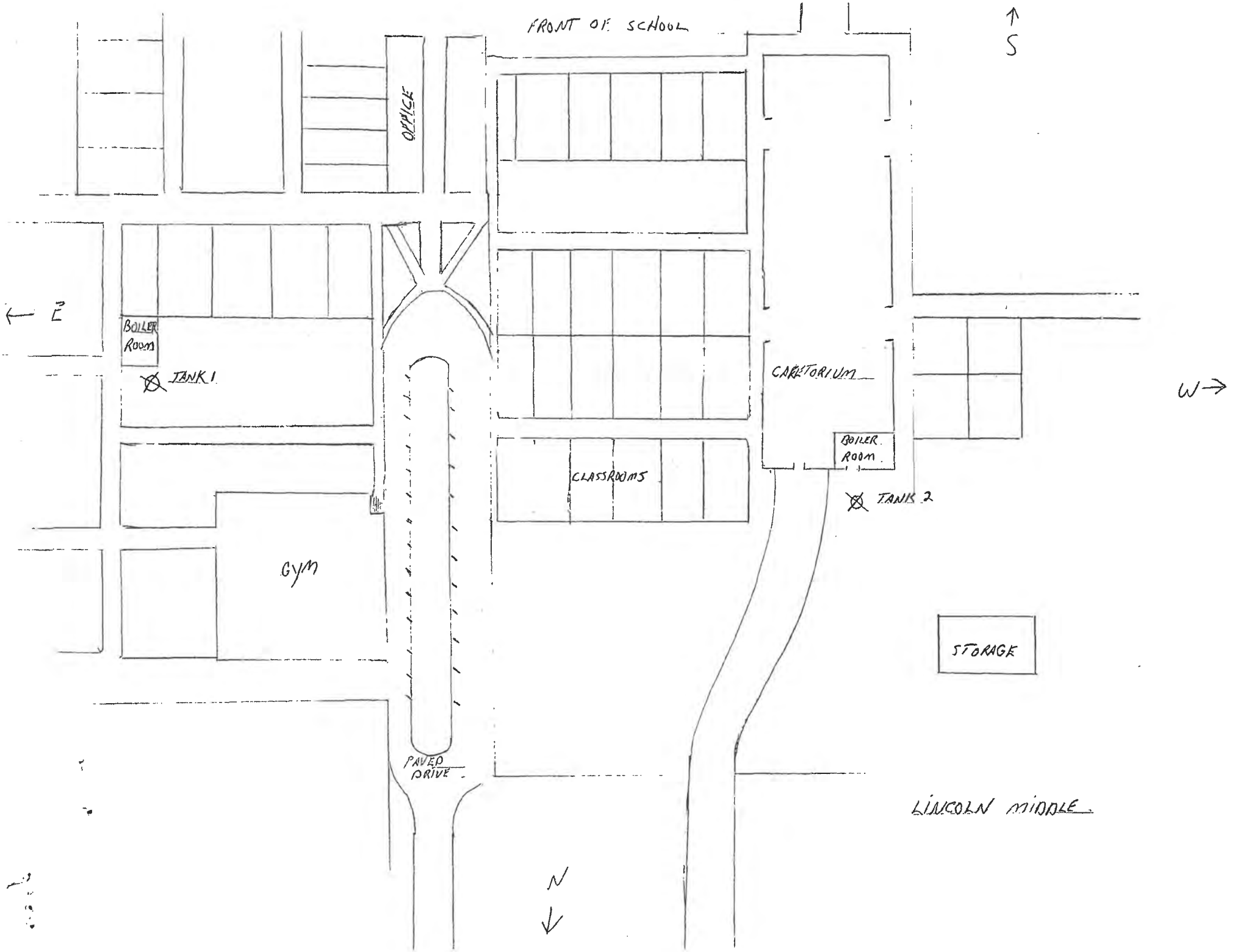
Monitoring system is:

A. automatically sampled well(s).
B. manually sampled well(s).
C. groundwater monitoring plan.
D. SPCC plan.
E. well/detector in secondary containment.
F. in-ground detector.
G. within walls of double-walled tank.
H. continuous in piping.
I. not required.
N. none of the above.

List 20

Tank disposal method.

A. Filling.
B. Removal.
C. Retrofitting.
F. Other.


FRONT OF SCHOOL
S
OFFICE
E
BOILER ROOM
TANK 1
CAFETORIUM
W
BOILER ROOM
CLASSROOMS
TANK 2
GYM
STORAGE
PAVED DRIVE
LINCOLN MIDDLE
N

Site No. 59

Lincoln Community Park TDSRS

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Southwest District Office
13051 N Telecom Parkway
Temple Terrace, FL 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

Sent via email to: sue.dunn@mymanatee.org

Date: 10/09/2024

Sue Dunn
3647 Cortez Rd. W.
Bradenton, FL 34210

RE: Authorization for Disaster Debris Management Sites (DDMS) - Milton

Dear Sue Dunn,

In accordance with the Emergency Final Order OGC No. 24-2580 (the Order), which was executed on 10/06/2024, the Department may issue field authorizations for disaster debris management sites (DDMS) to be used for temporary storage and processing of disaster debris. Disaster debris includes hurricane/storm-generated debris and all other types of disaster debris. The Order also gives the Department authority to include specific conditions in the field authorizations for the operation and closure of a DDMS, which may delineate a required closure date that extends beyond the expiration of the Order. A copy of this Order may be obtained from the DEP website http://www.dep.state.fl.us/mainpage/em/info.htm

The Department has evaluated your request for a DDMS at the following location:

WACS ID: 100681
Lincoln Community Park Tdsrs
501 17th Street Park, Palmetto
Lat 27:31:42.084 / Long 82:33:33.278
Waste Planned for Management: Construction & Demolition Debris, Yard Trash

The use of this DDMS is authorized subject to the following conditions, in addition to the requirements of the Order and Florida Statutes 403.7071:

1. **The Department must be notified when the site is opened and begins accepting debris, and when the site is closed and all debris has been removed;**
2. Standing water must not be allowed to accumulate in or within 50 feet of areas used to store or process disaster debris;
3. Access must be controlled to prevent unauthorized dumping and scavenging;
4. A DDMS must have spotters to correctly identify and segregate waste types for appropriate management;
5. Once the site is open, a spotter must be located in the area where waste is being deposited in order to spot and remove prohibited waste items;
6. The DDMS is limited to managing the type(s) of debris listed above; any putrescible waste received at the DDMS must be removed from the site within 48 hours; all other types of prohibited waste should be managed in

accordance with the guidance document (see link below);

7. Unless otherwise approved by the Department in response to a written request from you, the DDMS must cease operation, and all disaster debris must be removed from the site by 12/04/2024

The Department has also prepared a guidance document on the establishment, operation and closure of a DDMS for disaster debris. This guidance includes recommended practices, which you are expected to follow as much as practicable, as well as additional requirements from the Order. A copy of this guidance document is available on the DEP website at https://floridadep.gov/waste/permitting-compliance-assistance/documents/guidance-establishment-operation-and-closure. This guidance is not a substitute for federal requirements and guidance, including those from the Federal Emergency Management Agency (FEMA).

If you have any questions or comments on this authorization letter, or if you require additional time to operate your DDMS, please feel free to contact Emily Wargo by E-mail at emily.wargo@floridadep.gov or by phone at (813) 470-5942. In order to provide better service to you, the Department is using electronic documents as much as possible. Please provide your E-mail address when replying.

Sincerely,



10/09/2024

Melissa Madden
Southwest District

Date

MM/ew

Cc: chad.fetrow@dep.state.fl.us, chad.fetrow@floridadep.gov, darryn.gipson@em.myflorida.com, emily.stitt@floridadep.gov, emily.wargo@floridadep.gov, kelly.chase@dos.myflorida.com, melissa.madden@floridadep.gov

This letter generated by fetrow_c.

Site No. 60

Sylvan Oaks Park TDSRS

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

Southwest District Office
13051 N Telecom Parkway
Temple Terrace, FL 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

Sent via email to: sue.dunn@mymanatee.org

Date: 10/09/2024

Sue Dunn
3647 Cortez Rd. W.
Bradenton, FL 34210

RE: Authorization for Disaster Debris Management Sites (DDMS) - Milton

Dear Sue Dunn,

In accordance with the Emergency Final Order OGC No. 24-2580 (the Order), which was executed on 10/06/2024, the Department may issue field authorizations for disaster debris management sites (DDMS) to be used for temporary storage and processing of disaster debris. Disaster debris includes hurricane/storm-generated debris and all other types of disaster debris. The Order also gives the Department authority to include specific conditions in the field authorizations for the operation and closure of a DDMS, which may delineate a required closure date that extends beyond the expiration of the Order. A copy of this Order may be obtained from the DEP website http://www.dep.state.fl.us/mainpage/em/info.htm

The Department has evaluated your request for a DDMS at the following location:

WACS ID: 100685
Sylvan Oaks Park Tdsrs
715 17th Street East, Palmetto
Lat 27:31:40.9874 / Long 82:33:24.0537
Waste Planned for Management: Construction & Demolition Debris, Yard Trash

The use of this DDMS is authorized subject to the following conditions, in addition to the requirements of the Order and Florida Statutes 403.7071:

1. **The Department must be notified when the site is opened and begins accepting debris, and when the site is closed and all debris has been removed;**
2. Standing water must not be allowed to accumulate in or within 50 feet of areas used to store or process disaster debris;
3. Access must be controlled to prevent unauthorized dumping and scavenging;
4. A DDMS must have spotters to correctly identify and segregate waste types for appropriate management;
5. Once the site is open, a spotter must be located in the area where waste is being deposited in order to spot and remove prohibited waste items;
6. The DDMS is limited to managing the type(s) of debris listed above; any putrescible waste received at the DDMS must be removed from the site within 48 hours; all other types of prohibited waste should be managed in

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7. Unless otherwise approved by the Department in response to a written request from you, the DDMS must cease operation, and all disaster debris must be removed from the site by 12/04/2024

The Department has also prepared a guidance document on the establishment, operation and closure of a DDMS for disaster debris. This guidance includes recommended practices, which you are expected to follow as much as practicable, as well as additional requirements from the Order. A copy of this guidance document is available on the DEP website at https://floridadep.gov/waste/permitting-compliance-assistance/documents/guidance-establishment-operation-and-closure. This guidance is not a substitute for federal requirements and guidance, including those from the Federal Emergency Management Agency (FEMA).

If you have any questions or comments on this authorization letter, or if you require additional time to operate your DDMS, please feel free to contact Emily Wargo by E-mail at emily.wargo@floridadep.gov or by phone at (813) 470-5942. In order to provide better service to you, the Department is using electronic documents as much as possible. Please provide your E-mail address when replying.

Sincerely,



10/09/2024

Melissa Madden
Southwest District

Date

MM/ew

Cc: chad.fetrow@dep.state.fl.us, chad.fetrow@floridadep.gov, darryn.gipson@em.myflorida.com, emily.stitt@floridadep.gov, emily.wargo@floridadep.gov, kelly.chase@dos.myflorida.com, melissa.madden@floridadep.gov

This letter generated by fetrow_c.

Site No. 61

PDE USA Inc.

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: PDE USA Inc

On-Site Inspection Start Date: 03/09/2012 **On-Site Inspection End Date:** 03/09/2012

ME ID#: 61254 **EPA ID#:** FLR000063404

Facility Street Address: 716A 17th St E, Palmetto, Florida 34221-3360

Contact Mailing Address: 716A 17th St E, Palmetto, Florida 34221-3360

County Name: Manatee **Contact Phone:** (941) 721-0313

NOTIFIED AS:

CESQG (<100 kg/month)

INSPECTION TYPE:

Site Visit Inspection for Closed facility

INSPECTION PARTICIPANTS:

Principal Inspector: Rebecca Foster, Inspector

Other Participants: none available

LATITUDE / LONGITUDE: Lat 27° 31' 46.183" / Long 82° 33' 24.6012"

SIC CODE:

TYPE OF OWNERSHIP: Private

Introduction:

A site visit was conducted at 716a 17th St E, Palmetto, FL. This parcel is currently vacant. PDE USA is an inactive corporation in Sunbiz.org.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

Conclusion:

PDE USA, Inc. is a closed facility.

Inspection Date: 03/09/2012

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Rebecca Foster
PRINCIPAL INSPECTOR NAME

Inspector
PRINCIPAL INSPECTOR TITLE



PRINCIPAL INSPECTOR SIGNATURE

3/13/2012
DATE

none available
REPRESENTATIVE NAME

NO SIGNATURE
REPRESENTATIVE SIGNATURE

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

February 24, 2000

DON PARKS, PRES
PDE USA INC
716A 17TH ST E
PALMETTO, FL 34221-

The Hazardous Waste Regulation Section has reviewed your application for a hazardous waste DEP/EPA Identification Number. Based on the information received you have been issued the following identification number for the facility located at 716A 17TH ST E , PALMETTO:

FLR000063404

Your facility status is the following:

Conditionally Exempt SQG

This letter is not an approval to transport hazardous waste or to operate a hazardous waste treatment, storage, or disposal (TSD) facility. Please contact the Department for complete requirements for hazardous waste transporters and TSDs.

Please notify us in writing if there is any change in your operations which would affect your status. For further assistance, please call (850)488-0300.

Sincerely,

Michael X. Redig

Michael X. Redig
Environmental Manager
Hazardous Waste Regulation Section

Site: 166333

ID - For Official Use Only

RECEIVED

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes; Refer to instructions)*

A. Hazardous Waste Activity

1. Generator (See instructions)
   - ☐ a. Greater than 1000kg/mo (2,200 lbs.)
   - ☐ b. 100 to 1000 kg/mo (200-2,200 lbs.)
   - ☒ c. Less than 100 kg/mo (220 lbs)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - ☐ a. For own waste only
   - ☐ b. For commercial purposes

Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify

☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.

4. Hazardous Waste Fuel
   - ☐ a. Generator Marketing to Burner
   - ☐ b. Other Marketers
   - ☐ c. Boiler and/or Industrial Furnace
     - ☐ 1. Smelter Deferral
     - ☐ 2. Small Quantity Exemption

   Indicate Type of Combustion Device(s)
   - ☐ 1. Utility Boiler
   - ☐ 2. Industrial Boiler
   - ☐ 3. Industrial Furnace

☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuels/Waste Regulation
   - ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
   - ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
   - ☐ a. Utility Boiler
   - ☐ b. Industrial Boiler
   - ☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
   - ☐ a. Transporter
   - ☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
   - ☐ a. Process
   - ☐ b. Re-refine

IX. Description of Hazardous Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
X				

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
F001	F002	F003	F005		
7	8	9	10	11	12

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
D Parks	DON PARKS PRESIDENT	2/8/00

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

Site No. 62

Precision Collision

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Precision Collision

On-Site Inspection Start Date: 03/09/2012 **On-Site Inspection End Date:** 03/09/2012

ME ID#: 40868 **EPA ID#:** FLD982131856

Facility Street Address: 706 17th St E, Palmetto, Florida 34221-3325

Contact Mailing Address: 706 17th St E, Palmetto, Florida 34221-3325

County Name: Manatee **Contact Phone:** (941) 722-9177

NOTIFIED AS:

SQG (100-1000 kg/month)

INSPECTION TYPE:

Site Visit Inspection for Non-Handler facility

INSPECTION PARTICIPANTS:

Principal Inspector: Rebecca Foster, Inspector

Other Participants: None Available

LATITUDE / LONGITUDE: Lat 27° 31' 46.3982" / Long 82° 33' 25.8924"

SIC CODE:

TYPE OF OWNERSHIP: Private

Introduction:

A site visit was conducted at 706 17th St East, Palmetto, FL. Precision Collision is no longer in operation at this location. The building at this address is vacant. There are mutiple entries for "Precision Collision" in Sunbiz.org none of whcih are located in Manatee County.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

Conclusion:

Precision Collision is a clsoed facility.

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Rebecca Foster
PRINCIPAL INSPECTOR NAME

Inspector
PRINCIPAL INSPECTOR TITLE



PRINCIPAL INSPECTOR SIGNATURE

3/12/2012
DATE

None Available
REPRESENTATIVE NAME

NO SIGNATURE
REPRESENTATIVE SIGNATURE

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Site No. 63

Mailloux & Sons, Inc.

Please print or type. 536145 139911 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: FLT210089068
2. Page 1 of: 1
3. Emergency Response Phone: 941-723-1955
4. Manifest Tracking Number: 021465783 JJK

5. Generator's Name and Mailing Address
MAILLOUX & SONS INC
612 H 17TH STREET EAST
PALMETTO FL 34221
Generator's Phone: 941 723-1955

Generator's Site Address (if different than mailing address)
BRENTWOOD ELEMENTARY SCHOOL
2500 VINSON AVENUE
SARASOTA FL 34232

6. Transporter 1 Company Name: Freehold Cartage, Inc. U.S. EPA ID Number: NJD053106467

7. Transporter 2 Company Name: Giant Resource Recovery Railhead U.S. EPA ID Number: SCD981594991

AFFIX TO RIGHT SIDE OF ALL HAZARDOUS MATERIALS BILLS AT LINE SO TAB WILL STICK OUT
HAZTAB / G C LABEL 1-800-897-9558

8. Designated Facility Name and Site Address
GIANT RESOURCE RECOVERY-SUMTER,INC
765 INDUSTRIAL ROAD
SUMTER SC 29150
Facility's Phone: 803 773-1400
U.S. EPA ID Number: SCD036275626

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. NA3077, Hazardous waste, solid, n.o.s. (LEAD) 9, PGIII, ERG#171, #156160	006	DM	00330	G	D008		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information: 1)(E) ERG#171 #156160

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Marco Lopato Signature: Month 12 Day 22 Year 21

INT'L
16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER
17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: James Taylor Signature: Month 3 Day 29 Year 21
Transporter 2 Printed/Typed Name: Vern Bryan Signature: on behalf of GRR Railhead Month 4 Day 9 Year 21

DESIGNATED FACILITY
18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Joseph Brent Brown Signature: Month 5 Day 2 Year 21

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete. DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number FLT2100890U6	22. Page 2 of 2	23. Manifest Tracking Number 021465783JJK

24. Generator's Name: Mailloux & Sons Inc.

25. Transporter 3 Company Name: Industrial Waste Services — U.S. EPA ID Number: SCR000762245

26. Transporter 4 Company Name: Industrial Waste Services — U.S. EPA ID Number: SCR000762245

27a. HM	27b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes

Wans Only

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter ____ Acknowledgment of Receipt of Materials
Printed/Typed Name: [illegible] — Signature: [signature] — Month 4 Day 22 Year 21

34. Transporter ____ Acknowledgment of Receipt of Materials
Printed/Typed Name: Tony Christmas — Signature: Tony Christmas — Month 5 Day 2 Year 21

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

Grr!

Giant Resource Recovery - Sumter, Inc.

755 Industrial Rd - PO Box 1755 - Sumter, SC 29151 - Phone: (803) 773-1400 - Fax: (803) 773-7423

CERTIFICATE OF COMPLIANCE AND DISPOSAL

GENERATOR: **MAILLOUX & SONS**
612 H 17TH STREt
PALMETTO FL 34221

EPA ID NUMBER: **FLT210089066**
MANIFEST NO#: **021465783JJK**

DATE RECEIVED: **5/2/2021**

RECEIVING FACILITY: GIANT RESOURCE RECOVERY - SUMTER, INC.

EPA ID NO#: SCD036275626

FACILITY ADDRESS: SUMTER, SC 29150

On the referenced date, your waste material was received at our facility for the purpose of treating for disposal and/or recycling for reuse.

It will be processed in accordance with state and federal regulations. Any portion not recycled for reuse will ultimately be sent by Giant Resource Recovery to a permitted disposal facility.

Document: **536145** Date Shipped: **3/22/2021**
Brokered by: CLEAN MANAGEMENT

Please print or type. 536145 139411 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	FLT2100890668	1	941-723-1955	021465783 JJK

GENERATOR

5. Generator's Name and Mailing Address
MAILLOUX & SONS INC
612 H 17TH STREET EAST
PALMETTO FL 34221
Generator's Phone: 941 723-1855

Generator's Site Address (if different than mailing address)
BRENTWOOD ELEMENTARY SCHOOL
2500 VINSON AVENUE
SARASOTA FL 34232

6. Transporter 1 Company Name: Freehold Carto, Inc. U.S. EPA ID Number: NJD053106165

7. Transporter 2 Company Name: Giant Resource Recovery Railhead U.S. EPA ID Number: SCD981594991

AFFIX TO RIGHT SIDE OF ALL HAZARDOUS MATERIALS BILLS AT LINE SO TAB WILL STICK OUT
HAZTAB / G C LABEL 1-800-937-9988

MATERIALS

8. Designated Facility Name and Site Address
GIANT RESOURCE RECOVERY-SUMTER,INC
755 INDUSTRIAL ROAD
SUMTER SC 29150
Facility's Phone: 803 773-1400
U.S. EPA ID Number: SCD036275626

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. NA3077, Hazardous waste, solid, n.o.s. (LEAD) 9, PGIII, ERG#171, #156160	006	DM	00330	G	D008		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information: 1)(E) ERG#171 #156160

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Marco Carato Signature: Month 12 Day 22 Year 21

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: James Ivey Signature: Month 3 Day 22 Year 21
Transporter 2 Printed/Typed Name: Verle Bryan Signature: on behalf of GRR Railhead Month 4 Day 9 Year 21

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number: U.S. EPA ID Number
18b. Alternate Facility (or Generator)
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Joseph Brentrup Signature: Month 5 Day 2 Year 21

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete. DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number: FLT 210089046

22. Page: 2 of 2

23. Manifest Tracking Number: 021465783 JJK

24. Generator's Name: Mailloux & Sons Inc.

25. Transporter 3 Company Name: Industrial Waste Services — U.S. EPA ID Number: SCR000762245

26. Transporter 4 Company Name: Industrial Waste Services — U.S. EPA ID Number: SCR000762245

27a. HM	27b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		

Wans Only

32. Special Handling Instructions and Additional Information

TRANSPORTER

33. Transporter ____ Acknowledgment of Receipt of Materials
Printed/Typed Name: [illegible] — Signature: — Month 4 Day 22 Year 21

34. Transporter ____ Acknowledgment of Receipt of Materials
Printed/Typed Name: Tony Christmas — Signature: Tony Christmas — Month 5 Day 2 Year 21

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

EPA Form 8700-22A (Rev. 12-17) Previous editions are obsolete.

DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM

Grr!

Giant Resource Recovery - Sumter, Inc.

755 Industrial Rd - PO Box 1755 - Sumter, SC 29151 - Phone: (803) 773-1400 - Fax: (803) 773-7423

CERTIFICATE OF COMPLIANCE AND DISPOSAL

GENERATOR: **MAILLOUX & SONS**
612 H 17TH STREt
PALMETTO FL 34221

EPA ID NUMBER: **FLT210089066**
MANIFEST NO#: **021465783JJK**

DATE RECEIVED: **5/2/2021**

RECEIVING FACILITY: GIANT RESOURCE RECOVERY - SUMTER, INC.

EPA ID NO#: SCD036275626

FACILITY ADDRESS: SUMTER, SC 29150

On the referenced date, your waste material was received at our facility for the purpose of treating for disposal and/or recycling for reuse.

It will be processed in accordance with state and federal regulations. Any portion not recycled for reuse will ultimately be sent by Giant Resource Recovery to a permitted disposal facility.

Document: **536145** Date Shipped: **3/22/2021**
Brokered by: CLEAN MANAGEMENT

Site No. 64

Racetrac #549

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Storage Tanks & Contamination Monitoring Information

Cover Page Report

Report Run Date: 03/23/2026 | Last Data Refresh: 03/22/2026 | Report Generated from DOPPLER

District Southwest

County Manatee

ID 9602592

Name RACETRAC #549
1730 US HWY 41 N
PALMETTO, FL 34221

Contact JORDAN WOODFIN

Phone (770) 431-7600

Type Retail Station

Status OPEN

Latitude 27° 31' 46.0542

Longitude 82° 33' 36.26

LL Method DGPS

LL Status REVIEWED

Status Date 11/04/2003

Account Owner Information

Name RACETRAC INC
200 GALLERIA PKWY SE #900
Atlanta, GA 30339-5945

Contact MAX BURMEISTER

Phone (770) 431-7600

Email FDEP_CORRESPONDENCE@RACETRAC.COM

Effective Date 12/04/1996

Placard # / Date 724667 - 06/30/2025

No Property Owner Information Found

Tank	Tank Size	Content	Installed	Placement	Status
1	12000	Unleaded Gas (B)	11/01/1996	UNDERGROUND	In Service (U)

Constructions **Pipings** **Monitorings**

(A) Ball check valve
(F) Fiberglass clad steel
(M) Spill containment bucket
(N) Flow shut-Off
(O) Tight fill
(P) Level gauges/alarms
(R) Double wall - tank jacket

(C) Fiberglass
(F) Double wall
(J) Pressurized piping system
(K) Dispenser liners

(2) Visual inspect pipe sumps
(3) Electronic monitor pipe sumps
(4) Visual inspect dispenser liners
(F) Monitor dbl wall tank space
(G) Electronic line leak detector
(K) Monitor dbl wall pipe space

Tank	Tank Size	Content	Installed	Placement	Status
2	12000	Vehicular Diesel (D)	11/01/1996	UNDERGROUND	In Service (U)

Constructions
(A) Ball check valve
(F) Fiberglass clad steel
(M) Spill containment bucket
(N) Flow shut-Off
(O) Tight fill
(P) Level gauges/alarms
(R) Double wall - tank jacket

Pipings
(C) Fiberglass
(F) Double wall
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(2) Visual inspect pipe sumps
(3) Electronic monitor pipe sumps
(4) Visual inspect dispenser liners
(F) Monitor dbl wall tank space
(G) Electronic line leak detector
(K) Monitor dbl wall pipe space

Tank	Tank Size	Content	Installed	Placement	Status
3	15000	Unleaded Gas (B)	11/01/1996	UNDERGROUND	In Service (U)

Constructions
(A) Ball check valve
(F) Fiberglass clad steel
(M) Spill containment bucket
(N) Flow shut-Off
(O) Tight fill
(P) Level gauges/alarms
(R) Double wall - tank jacket

Pipings
(C) Fiberglass
(F) Double wall
(J) Pressurized piping system
(K) Dispenser liners

Monitorings
(2) Visual inspect pipe sumps
(3) Electronic monitor pipe sumps
(4) Visual inspect dispenser liners
(F) Monitor dbl wall tank space
(G) Electronic line leak detector
(K) Monitor dbl wall pipe space

Insurance Documents

FR Type	Effective Date	Expiration Date	Company Name

SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	04/30/2025	04/30/2026
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	04/30/2024	04/30/2025
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	04/30/2023	04/30/2024
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	04/30/2022	04/30/2023
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	12/23/2020	12/23/2021
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	12/23/2019	12/23/2020
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	12/23/2018	12/23/2019
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	01/21/2017	01/21/2018
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	12/23/2016	12/23/2017
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	01/21/2016	01/21/2017
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	01/21/2015	01/21/2016
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	01/21/2013	01/21/2014
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	01/27/2012	01/27/2013

SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	01/28/2011	01/28/2012
SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER	02/10/2009	02/10/2010

System Tests

Type	Due Date
INTEGRITY TEST - STP SUMP	01/31/2027
INTEGRITY TEST - DISPENSER SUMP	07/31/2027
INTEGRITY TEST - DISPENSER SUMP	08/31/2027
INTEGRITY TEST - DOUBLE-WALLED SPILL BUCKET	01/31/2027
ANNUAL OPERABILITY - RELEASE DETECTION	11/30/2024
ANNUAL OPERABILITY - RELEASE DETECTION	11/30/2025
ANNUAL OPERABILITY - OVERFILL PROTECTION	11/30/2025
ANNUAL OPERABILITY - OVERFILL PROTECTION	11/30/2024
ANNUAL OPERABILITY - LINE LEAK DETECTOR	11/30/2025
ANNUAL OPERABILITY - LINE LEAK DETECTOR	11/30/2024

Legacy Compliance Activity Information

Activity Code	Date Initiated	Date Completed	Results	Inspector	AST/UST Count	Description
TCI	04/27/2006	05/01/2006	IN-COMPLIANCE	MARK TRETHEWEY	0/3	COMPLIANCE ASSURANCE
TCI	05/05/2005	05/06/2005	IN-COMPLIANCE	MARK TRETHEWEY	0/3	COMPLIANCE ASSURANCE
	Completion Notes IN COMPLIANCE					
CFFE	09/15/2004	09/15/2004		REEDER_J	0/0	COMPLIANCE ASSURANCE
RRBD	08/05/2004	08/05/2004	IN-COMPLIANCE	PANIK	0/0	COMPLIANCE ASSURANCE

NCLI	06/02/2004	06/02/2004		FARMER	0/3	COMPLIANCE ASSURANCE
EPI	05/27/2004	08/09/2004		REEDER_J	0/0	COMPLIANCE ASSURANCE
TCR	05/27/2004	06/02/2004	MINOR OUT-OF-COMPLIANCE	FARMER	0/3	COMPLIANCE ASSURANCE
CRDE	05/27/2004	08/09/2004		REEDER_J	0/0	COMPLIANCE ASSURANCE
RRBD	11/26/2003	01/08/2004				COMPLIANCE ASSURANCE
TCI	10/27/2003	10/27/2003	SIGNIFICANT OUT-OF-COMPLIANCE	SEGO	0/3	COMPLIANCE ASSURANCE
NCLI	10/27/2003	10/27/2003				COMPLIANCE ASSURANCE
RRBD	05/20/2003	06/19/2003				COMPLIANCE ASSURANCE
TCI	01/16/2003	02/06/2003	SIGNIFICANT OUT-OF-COMPLIANCE	SEGO	0/3	COMPLIANCE ASSURANCE
TCI	05/21/2002	05/31/2002	IN-COMPLIANCE	FIELDS	0/3	COMPLIANCE ASSURANCE
TCI	05/23/2001	05/31/2001	IN-COMPLIANCE	FIELDS	0/3	COMPLIANCE ASSURANCE
TCI	08/13/1999	08/31/1999	IN-COMPLIANCE	POUSO	0/3	COMPLIANCE ASSURANCE

Compliance Activity Information

Activity Code	Date Completed	Results	Inspector	AST/UST Count	Description
Incident	11/14/2025	Has not led to Discharge	SHANBERG_VJ_1		Incident
Letter	11/14/2025	Satisfied	SHANBERG_VJ_1		Compliance Assistance
Document Management	11/14/2025	Satisfied	SHANBERG_VJ_1		Incident

Electronic Communication	11/03/2025	Satisfied	SHANBERG_VJ_1		Routine Compliance
Letter	11/03/2025	Satisfied	SHANBERG_VJ_1		Compliance Assistance
Site Inspection	11/03/2025	Minor Out of Compliance	SHANBERG_VJ_1	0/3	Routine Compliance
Issue Document	11/03/2025	Satisfied	SHANBERG_VJ_1		Routine Compliance
Electronic Communication	11/03/2025	Satisfied	SHANBERG_VJ_1		Routine Compliance
Site Inspection	10/27/2023	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Letter	10/27/2023	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	10/27/2023	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Record Document	11/04/2021	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	11/04/2021	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Site Inspection	10/11/2021	Major Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Issue Document	10/11/2021	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Letter	10/11/2021	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Record Document	01/02/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Issue Document	01/02/2020	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Letter	10/30/2019	Satisfied	TRETHEWEY_MB_1		Compliance Assistance
Electronic Communication	10/30/2019	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	10/30/2019	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	10/30/2019	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Electronic Communication	10/30/2019	Satisfied	TRETHEWEY_MB_1		Routine Compliance

Issue Document	04/14/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	04/14/2017	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Electronic Communication	04/04/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	04/04/2017	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	03/12/2015	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Issue Document	03/12/2015	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Issue Document	08/21/2013	Satisfied	TRETHEWEY_MB_1		Routine Compliance
Site Inspection	08/16/2013	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
TCAR	04/25/2013	Satisfied	TRETHEWEY_MB_1		Closure
Site Inspection	02/25/2013	In Compliance	TRETHEWEY_MB_1	0/3	Closure
Site Inspection	02/25/2013	In Compliance	TRETHEWEY_MB_1	0/3	Installation
Site Inspection	03/23/2012	In Compliance	MASON_RS_1	0/3	Routine Compliance
Site Inspection	04/15/2011	In Compliance	MASON_RS_1	0/3	Routine Compliance
Record Document	03/10/2011	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	05/19/2010	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Letter	05/19/2010	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Record Document	03/05/2009	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Letter	02/20/2009	Satisfied	TRETHEWEY_MB_1		Non-Compliance
Site Inspection	02/20/2009	Minor Out of Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance

Site Inspection	03/12/2008	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Emergency Preparedness Information	05/21/2007	Satisfied	REEDER_JH_1		Routine Compliance
Site Inspection	04/10/2007	In Compliance	TRETHEWEY_MB_1	0/3	Routine Compliance
Emergency Preparedness Information	02/14/2007	Satisfied	REEDER_JH_1		Routine Compliance
Emergency Preparedness Information	09/22/2006	Satisfied	REEDER_JH_1		Routine Compliance

No Open AOCs Found

No Open Violations Found

No Discharges Found

Florida Department of Environmental Protection
Twin Towers Office Bldg. 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400
Division of Waste Management
Petroleum Storage Systems
Storage Tank Facility Routine Compliance Site Inspection Report

Facility Information:

Facility ID: 9602592
Facility Type: A - Retail Station
Facility Name: RACETRAC #549
1730 US HWY 41 N
PALMETTO, FL 34221
Latitude: 27° 31' 46.0542"
Longitude: 82° 33' 36.26"
LL Method: DGPS

County: MANATEE

Inspection Date:10/20/2025

# of inspected ASTs: 0
USTs: 3
Mineral Acid Tanks: 0

Inspection Result:

Result: Minor Out of Compliance

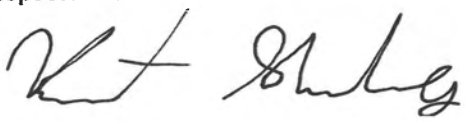
Signatures:

TKMNEM - MANATEE-HILLSBOROUGH COUNTY ENVIRO PROT COMM (813) 627-2600

Storage Tank Program Office and Phone Number

Vincent Shanberg

Inspector Name



Inspector Signature
Principal Inspector

MANATEE-HILLSBOROUGH COUNTY ENVIRO PROT COMM

Emailed to Alex Bauer

Representative Name

No Signature

Representative Signature

Atlas

Emailed to FDEP Correspondence

Representative Name

No Signature

Representative Signature

Racetrac

Owners of UST facilities are reminded that the Federal Energy Policy Act of 2005 and 40 CFR 280 Subpart J requires Operator Training at all facilities by October 13, 2018. For further information please visit: https://floridadep.gov/waste/permitting-compliance-assistance/content/underground-storage-tank-operator-training

Financial Responsibility:

Financial Responsibility: SELF-INSURANCE - LETTER FROM CHIEF FINANCIAL OFFICER

Insurance Carrier:

Effective Date: 04/30/2025 Expiration Date: 04/30/2026

Findings:

Class A Owner Training Certificates are present.
Class B Maintenance Training Certificates are present.
Class C Operator Training Certificates are present.

Completed System Tests

Type	Date Completed	Results	Reviewed	Next Due Date	Comment
Annual Operability - Line Leak Detector	11/13/2024	Passed	10/31/2025	11/30/2025	
Annual Operability - Line Leak Detector	11/16/2023	Passed	10/31/2025	11/30/2024	
Annual Operability - Overfill Protection	11/13/2024	Passed	10/31/2025	11/30/2025	
Annual Operability - Overfill Protection	11/16/2023	Passed	10/31/2025	11/30/2024	
Annual Operability - Release Detection	11/13/2024	Passed	10/31/2025	11/30/2025	
Annual Operability - Release Detection	11/16/2023	Passed	10/31/2025	11/30/2024	
Integrity Test - Dispenser Sump	08/20/2024	Passed	10/31/2025	08/31/2027	Test performed for #15/16 through 27/28
Integrity Test - Dispenser Sump	07/18/2024	Passed	10/31/2025	07/31/2027	Test performed for #1/2 through 13/14
Integrity Test - Double-walled Spill Bucket	01/08/2024	Passed	10/31/2025	01/31/2027	
Integrity Test - STP Sump	01/08/2024	Passed	10/31/2025	01/31/2027	All passed except Premium STP sump retested on 03/06 /2024

Reviewed Records

Record Category	Record type	From Date	To Date	Reviewed Record Comment
Three Years	Certificate of Financial Responsiblity	04/30/2024	10/20/2025	
Three Years	Monthly Maint. Visual Examinations and Results	11/14/2023	09/24/2025	
Three Years	Electronic Release Detection Equip. Monthly Checks	11/14/2023	09/24/2025	

Violations:

Type:	Violation
Significance:	Minor
Rule:	62-761.405(3)
Violation Text:	Incident Notification Form (INF) not received in a timely manner.
Explanation:	premium STP sump failed integrity testing on 01/08/2025. An Incident Notification Form must be submitted for any positive response of release detection device unless investigation is initiated within 24hrs and it is determined within 72hrs that a discharge has not occurred. Also, the investigation must be completed within two weeks of the date of discovery of the incident.
Corrective Action:	Submit an INF for the failed integrity testing to Manatee County NRD for review.

Inspection Comments

10/20/2025
RECORDS: #9602592, 10/20/2025

Placard: #724667; issued 06/30/2025, 3 tanks listed.

Financial Responsibility: Self-Insurance, 04/30/2025 - 04/30/2026. Coverage also provided for 04/30/2024 - 04/30 /2025.

CoFR: Provided with FR.

Release Detection:
a. This Facility has the following release detection methods:
1. Veeder-Root TLS-350 console (EQ #197) with liquid level sensors in the interstice of all three tanks. Float sensors are located in all three STP sumps for interstitial monitoring of the double-wall piping. Veeder-Root Electronic Line Leak Detectors (EQ #271) for the primary piping and monthly visual inspections of the double walled fills, dispensers/liners, and STP sumps (sumps are also electronically monitored).

b. Facility monthly release detection results:
1. Reviewed the liquid status and alarm history tapes of all sensors from 11/14/2023 to 09/24/2025. Note: Liquid Status and Alarm History Tapes collected during this inspection.

2. Reviewed the monthly visual inspection records from 11/14/2023 to 09/24/2025. Visual inspections include the DW fills, dispensers/liners, and STP sumps. Release detection was performed at least once a month not exceeding 35 days apart.

Tests:
1. The annual operability test of the Veeder-Root monitor and sensors was performed on 11/13/2024 by Tanknology, Inc., all passed. The next tests are due by 11/30/2025. Tests were also provided for 11/16/2023.

2. The annual operability tests of the electronic line leak detectors were performed on 11/13/2024 by Tanknology, Inc., all passed. The next tests are due by 11/30/2025. Tests were also provided for 11/16/2023.

3. The annual operability tests of the overfill protection devices were performed on 11/13/2024 by Tanknology, Inc., all passed. The next tests are due by 11/30/2025. Tests were also provided for 11/16/2023.

4. Integrity tests of the double walled spill buckets (vacuum) were performed on 01/08/2024 by Tanknology, Inc., all passed. The next tests are due by 01/31/2027.

5. Integrity tests of the STP sumps (hydro) were performed on 01/08/2024 by Tanknology, Inc., all passed expect Premium STP sump (Retested on 03/16/2024). The next tests are due by 01/31/2027.
Please note INF is required for the failed integrity testing for the Premium STP sump

6.Integrity tests of the dispensers liners (hydro) were performed on 07/18/2024 (#1/2 - 13/14) and 08/20/2024 (#15 /16 - 27/28) by Tanknology, Inc., all passed. The next tests are due by 07/31/2027 and 08/31/2027.

PHYSICAL:

STP Sumps: All the sumps are dry. All sensors are positioned properly. NOTE: Regular tank has two sumps and STPs.

Dispenser Liners: Inspected Dispensers 1/2 thru 27/28 (14 dispensers w/ 28 stations). All liners are dry.

Fills: The covers properly painted. The fills are unobstructed. Interstices were not opened; release detection indicates no problems.

Shear Valves: All shear valves are secure.

Inspection Photos

Added Date 10/31/2025

9602592 Tank field 10-20-2025



Natural Resources Department
Environmental Protection Division
1501 Dam Road
Bradenton, FL 34212
Phone: (941) 742-5980
www.mymanatee.org

11/14/2025

Taylor Kendrick
RACETRAC INC
200 GALLERIA PKWY SE #900
Atlanta, GA 30339-5945
Email: FDEP_CORRESPONDENCE@RACETRAC.COM

RE: Return to Compliance
Facility ID#41/ 9602592 RACETRAC #549
1730 US HWY 41 N., PALMETTO, FL 34221

Dear Taylor Kendrick:

Manatee County Natural Resources Dept., contracted with Hillsborough County for the Florida Department of Environmental Protection, issued a Compliance Assistance Offer letter to the above-referenced facility on 11*/03/2025*. Based on the information provided, *11/07/2025*, the facility was determined to have returned to compliance with the Department's Storage Tank rules and regulations.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Vincent Shanberg at 941-742-5980 X1880 / or vincent.shanberg@mymanatee.org

Sincerely,

Vincent Shanberg
Senior Environmental Specialist
Natural Resources Department
Environmental Protection Division

EC: Alex Bauer, Contractor (alexandra.bauer@oneatlas.com)

CAROL ANN FELTS *District 1*
AMANDA BALLARD *District 2*
TAL SIDDIQUE *District 3*
MIKE RAHN *District 4*
ROBERT McCANN *District 5*
JASON BEARDEN *At Large*
GEORGE W. KRUSE *At Large*

Site No. 65

Spill Site

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Emergency Response Incident Report

Incident #:	County:	Latitude:	Incident Date: 12/18/2001
2001-4I-12571Z	Manatee	Longitude:	Incident Time: 12:00 AM US/EASTERN

OER Employee Receiving Report:	OER Responses:	Reported Date: 12/18/2001
	Phone, Followup	Reported Time: 12:00 AM US/EASTERN

Incident Reported By:

Location of Incident:
US 41 & 20th Street

Nearest City/Town: PALMETTO

Threat to U.S Navigable Waters? No
Describe Threat:

Confirmed/Potential:

Descriptions:	Modes:	Media Affected:	Actions:
Spill	Highway	Impervious surface	Absorbent used
Vehicle Accident		Storm drain	Contractor hired

Incident Contractors:

Incident Parties:

Company Name: George Young Construction Inc.

Party Type: Responsible Party,

Address:
6415 US 41 South PALMETTO FL 34221 US

Phones:
Home : 813-645-0177 Extn:

Contact Person:

Insurance Company:
Policy#:

Pollutants:

Pollutant Name	Category	Potential Amount	Actual Amount	Unit Of Measure	Determined By
Diesel fuel	Petroleum		50.00	gallon	

	Coastal Category:	(Landward COLREG Line)	(Seaward COLREG Line)
No	Minor	< 1000 gallons	< 10,000 gallons
No	Moderate	1000 to 10,000 gallons	10,000 to 100,000 gallons

No	Major	> 10,000 gallons	> 100,000 gallons

Agencies Responded:
Agencies Notified:

FOSC Notified: No **Date:** **FOSC Response:** No
Name of FOSC Notified: **Time:**

Narrative:

OER/State On-Scene Coordinator: **Date:** **Hours spent:**	**Federal On-Scene Coordinator:**
	*The above actions were properly taken and coordinated with the National Contingency Plan (NCP, 40 CFR 300)
ID# **Fax#**	**Fax#** **Date:**
Print **Sign:**	**Print** **Sign:**

OER Response Information

OER On-Scene Coordinator:	**Arrival Date:**	**Incident #:** 2001-4I-12571Z
	Arrival Time:	

PERSONNEL EXPENSES:

TRANSPORTATION EXPENSES:

PPE EXPENSES:
SAMPLING EQUIPMENT EXPENSES:
EXPENDABLE EXPENSES:
INSTRUMENTATION EXPENSES:
MISCELLANEOUS EXPENSES:
Incident Narrative:
Approved By: **Date:**

Site No. 66

Spill Site

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Emergency Response Incident Report

Incident #:	County:	Latitude: 27.5321 (verified)	Incident Date: 05/14/2020
2020-4I-65764Z	Manatee	Longitude: -82.5607 (verified)	Incident Time: 12:00 PM US/EASTERN
OER Employee Receiving Report:	**OER Responses:**		Reported Date: 05/14/2020
Arleo, Jamie	Follow-up, Phone		Reported Time: 01:00 PM US/EASTERN

Incident Reported By: Via SWO
Manatee County Fire Department Dispatch

Address:
FL US
Phones:
Business : 941-747-7776 Extn:
Contact Person:

Location of Incident:
US Highway 41 N and 21st Street E

Nearest City/Town: PALMETTO

Threat to U.S Navigable Waters? No
Describe Threat:

Confirmed/Potential:

Descriptions:	Modes:	Media Affected:	Actions:
Fuel Leak/Overflow	Highway	Impervious Surface	Disposal
Spill			Absorbent Used
Vehicle Accident			Contractor Hired

Incident Contractors:

Contractor Hired Responsible Party
Name: HEPACO, Inc.
Address: FL US
Phones:
Business : 800-888-7689 Extn:
DEP Contract#:

Incident Parties:

Company Name: CCC Transportation LLC
Party Type: Responsible Party,
Address:
509 East Highway 92 PO Drawer 67 AUBURNDALE FL 33823 US
Phones:
Business : 863-965-6832 Extn:

Contact Person: Lorbeer - ERTS, Chris
Insurance Company:
Policy#:

Pollutants:

Pollutant Name	Category	Potential Amount	Actual Amount	Unit Of Measure	Determined By
Diesel fuel	Petroleum	75.00	75.00	gallon	Contractor

	Coastal Category:	(Landward COLREG Line)	(Seaward COLREG Line)
No	Minor	< 1000 gallons	< 10,000 gallons
No	Moderate	1000 to 10,000 gallons	10,000 to 100,000 gallons

No Major	> 10,000 gallons	> 100,000 gallons	

Agencies Responded: Florida Highway Patrol, Local Fire Department
Agencies Notified: Florida Highway Patrol, Local Fire Department

FOSC Notified: No **Date:** **FOSC Response:** No
Name of FOSC Notified: **Time:**

Narrative:
SWO # 2020-2462

Coordinates verified.

OER/State On-Scene Coordinator: **Date:** **Hours spent:**	**Federal On-Scene Coordinator:**
	*The above actions were properly taken and coordinated with the National Contingency Plan (NCP, 40 CFR 300)
ID# **Fax#**	**Fax#** **Date:**
Print **Sign:**	**Print** **Sign:**

OER Response Information

OER On-Scene Coordinator:	**Arrival Date:** **Arrival Time:**	**Incident #:** 2020-4I-65764Z

PERSONNEL EXPENSES:

Arleo, Jamie	2.5	$ 35.42	per hour	$ 88.55

TRANSPORTATION EXPENSES:

PPE EXPENSES:

SAMPLING EQUIPMENT EXPENSES:

EXPENDABLE EXPENSES:

INSTRUMENTATION EXPENSES:

MISCELLANEOUS EXPENSES:

Incident Narrative:

On 05/14/20, the Manatee County Fire Department reported a diesel spill on US Hwy 41 and 21st Street E in Palmetto via the SWO. A semi-truck had punctured a saddle tank and released the fuel onto the roadway. After receiving the SWO Incident Report Tampa OER Responder Jamie Arleo contacted the reporting party and requested additional information on the incident. The trucking company planned on handling the cleanup. The fire department had already left the scene and dispatch did not have any RP information.

OER received a DRF on 05/28/20 from ERTS. ERTS had been tasked by the RP (CCC Transportation) to handle the incident. ERTS hired HEPCO for the cleanup. HEPCO applied absorbent to the roadway and collected the contaminated dirt used by the Fire Department. The contaminated media was placed into 55-gal drums for storage. Since the release remained on the asphalt, OER considers the incident closed.

Approved By: Jamie Arleo **Date:** 06/27/2020

Printout

Thursday, May 28, 2020 11:22 AM

Department of Environmental Protection

2600 Blair Stone Road ♦ Tallahassee, Florida 32399-2400

DEP Form: 62-761.900(1)
Form Title: Discharge Report Form
Effective Date: January 2017
Incorporated in Rule 62-761.405, F.A.C.

DISCHARGE REPORT FORM

Complete all applicable blanks, and submit copies of any analytical or field test results confirming contamination to soils, surface water, or groundwater to the County via email or mail.

Facility ID Number (If Registered): n/a Date of Form Completion: 05/14/2020 Date of Discovery: 05/14/2020

Facility Name: CCC Transportation, LLC County: Manatee

Facility (Property) Owner: n/a Telephone Number: n/a

Owner Mailing Address: 509 US Highway 92 E, Aburndale, FL 33823

Location of Discharge (Facility Street Address): US-41N and 21st Street East, Palmetto, FL Lat/Long: 27.5321/ -82.5607

Date of receipt of any test or analytical results confirming a discharge: 05/14/2020 Estimated number of gallons discharged: 75-Gallons

Discharge affected: (Check all that apply)

- [■] Soil
- [ ] Drinking water well(s)
- [ ] Groundwater
- [ ] Shoreline
- [ ] Soil water (water body name) _____
- [■] Other (specify) Asphalt

Evidence of discharge: (Check all that apply)

- [ ] Visual observation of sheen
- [■] Visual observation of free product
- [ ] Results or receipt of results of analytical tests
- [ ] Spill or vehicle overfill > 25 gallons to a pervious surface
- [ ] Stained soils
- [ ] Other (explain in comments)

Method of discovery and confirmation of discharge: (Check all that apply, see rule language explanation on instructions for this form)

- [■] Visual observation
- [ ] Groundwater analytical results
- [ ] Closure/Closure sampling assessment
- [ ] Soil analytical results
- [ ] Surface water analytical results
- [ ] Other (specify) _____

Type of regulated substance discharged: (Check all that apply)

- [ ] Gasoline
- [■] Diesel
- [ ] Heating oil
- [ ] Kerosene
- [ ] Aviation gas
- [ ] Jet fuel
- [ ] Used/waste oil
- [ ] New motor/lube oil
- [ ] Pesticide
- [ ] Grade 5 & 6 residual oils
- [ ] Mineral acids (ASTs)
- [ ] Ammonia compound
- [ ] Chlorine compound
- [ ] Biofuel blends
- [ ] Unknown
- [ ] Other (specify) _____
- [ ] Hazardous substance (USTs) – write name or Chemical Abstract Service (CAS) #: _____

Discharge originated from a: (Check all that apply)

- [■] Tank
- [ ] Piping
- [ ] Spill bucket
- [ ] Dispenser
- [ ] Piping sump
- [ ] Dispenser sump
- [ ] Other secondary containment
- [ ] Fitting or pipe connection
- [ ] Valve
- [ ] Tank truck
- [ ] Vehicle or customer vehicle
- [ ] Aircraft
- [ ] Railroad tankcar
- [ ] Barge, tanker ship or other vessel
- [ ] Pipeline
- [ ] Drum
- [ ] Unknown
- [ ] Other (specify) _____

Cause of the discharge: (Check all that apply)

- [ ] Spill
- [ ] Overfill
- [ ] Corrosion
- [■] Puncture
- [ ] Material failure (crack, split, etc.)
- [ ] Material incompatibility
- [ ] Improper installation
- [ ] Loose connection
- [ ] Collision
- [ ] Vehicle accident
- [ ] Fire/explosion
- [ ] Vandalism
- [ ] Weather
- [ ] Human error
- [ ] Unknown
- [ ] Other (specify) _____

Actions taken in response to the discharge:

The contractor deployed absorbent materials. Swept them in, and collected the spent absorbents for disposal.

Comments:

State Report#2020-2462

Agencies notified (as applicable):

- [ ] Fire Department
- [ ] County Program _____
- [ ] District Office _____
- [✓] State Watch Office 800-320-0519
- [ ] National Response Center 800-424-8802

To the best of my knowledge and belief, all information submitted on this form is true, accurate and complete.

Chris Lorbeer
Printed Name of Owner, Operator or Authorized Representative

Chris Lorbeer
Signature of Owner, Operator or Authorized Representative

Chris Lorber

Thursday, May 28, 2020 11:19 AM

Chris Lorber at 440-349-2700

HEPACO completed the cleanup

Printout

Thursday, May 28, 2020 11:06 AM

Florida Division of Emergency Management
State Watch Office
Incident Report

Map



Update 1 - 05/14/2020-17:28 / DEM-Grant

Per ERTS: Approximately 75 gallons spilled. The reporting party has been updated.

Main Information
Report #: 2020-2462
Status: Closed
Assigned To: DEP / Jamie Arleo
Reported to SWO on: 5/14/2020 12:49 ET
Severity: Local Incident
Description: Diesel Fuel Release
This situation involves: Hazardous Materials, Petroleum Spill
Affected Sectors: DEP District - Southwest, DEP OER Tampa - Day
Initial Report:

Manatee County 911 reports a release of 30-40 gallons of diesel fuel due to a vehicle accident in Palmetto. The release did not enter any storm drains or waterways. No clean up actions were planned. One, minor injury was reported.

Injuries: Yes (1 minor)

Fatalities (Unconfirmed by State Medical Examiner): No

Environmental Impact: Yes

DEP callback requested: No

Incident Occurred: 5/14/2020 12:22 ET

Most Recent Update Date/Time: 05/14/2020-17:29 ET

Most Recent Update: Per ERTS: Approximately 75 gallons spilled. The reporting party has been updated.

Affected Counties: Manatee

Facility Name or Description:

Incident Location: *Street 1:* US 41 *Street 2:* 21st Street E *City:* Palmetto

Coordinates: *Lat:* 27.53216, *Long:* -82.563445

Contact Information

Reporting Party: *Name:* Hal, Manatee County 911 |*Call Back Number 1:* 941-747-7776 |*Address:*

Responsible Party: *Name:* CCC Transportation |*Address:*

On-Scene Contact: Unknown

Hazardous Materials

Sub-Type: Toxic Industrial Chemical

Situation: Past Report

Description: 2020-2462

Chemical Name: Diesel Fuel

CAS Number: 68476-34-6

Quantity released: 296

Petroleum Spill

Sub-Type: On Land

Situation: Past Report

Description: Petroleum Spill

Petroleum Type: Fuel

Name or Description: Diesel

Source / Container: Vehicle

Quantity released: 75 gallons

Released: Outside environment

Cause of release: Vehicle accident

Storm drains affected: No

Waterways affected: No

Major roadways closed: No

Cleanup actions been taken: No

Notification 05/14/2020-12:54 / DEM-Grant

linda.mcwhorter@em.myflorida.com; John.Kohnke@myfloridacfo.com; John.Gatlin@myfloridacfo.com; wayne.watts@myfloridacfo.com; tjlyon@me.com; Kenneth.DeCastro@em.myflorida.com; EOC-COSLogistics@em.myflorida.com; Jeff.Swain@em.myflorida.com; sam.walters@em.myflorida.com; amy.godsey@em.myflorida.com; axel.runtschke@em.myflorida.com; justin.lazzara@em.myflorida.com; woodham.harvey@em.myflorida.com; DL.DOHDutyOfficers@flhealth.gov; SGDCEHPreparedness@FLhealth.gov; Jared.Moskowitz@em.myflorida.com; Kevin.Guthrie@em.myflorida.com; jared.rosenstein@em.myflorida.com; jason.mahon@em.myflorida.com; jon.bussey@em.myflorida.com; jim.roberts@em.myflorida.com; ashley.davis@em.myflorida.com; ian.guidicelli@em.myflorida.com; taylor.cheney@em.myflorida.com; MaryAlice.McElheney@dep.state.fl.us; Kristin.Gousse@floridadep.gov; Cory.Dilmore@floridadep.gov; russell.chris@epa.gov; John.Schrader@floridadep.gov; chris.stevens@em.myflorida.com; Eric.Lott@em.myflorida.com; Kevin.Hardy@em.myflorida.com; swp@em.myflorida.com; jamie.arleo@floridadep.gov; domenic.letobarone@floridadep.gov; mary.yeargan@floridadep.gov; ramandeep.kaur@floridadep.gov; michael.lynch@floridadep.gov; shannon.herbon@floridadep.gov; Kelley.M.Boatwright@floridadep.gov; charley.oneal@floridadep.gov; Lindsay.Brantley@floridadep.gov; James.Brock@FloridaDEP.gov; Steven.Tafuni@FloridaDEP.gov; Erica.Peck@FloridaDEP.gov; Max.Grondahl@FloridaDEP.gov; Lance.Kautz@FloridaDEP.gov; Dee.Ann.Miller@floridadep.gov; DEPNews@floridadep.gov; Shannon.Kennedy@floridadep.gov; Pamala.Vazquez@floridadep.gov; Hannah.Westervelt@FloridaDEP.gov; Jordan.Luscier@FloridaDEP.gov; jodie.fiske@em.myflorida.com; kesley.richardson@em.myflorida.com; paul.siddall@em.myflorida.com; EMDO@mymanatee.org; cnaswort@usf.edu; jfleischman@usf.edu; CGould@smfr.com; steve.litschauer@mymanatee.org; MBloski@smfr.com; jacob.saur@mymanatee.org

The State Watch Office values your feedback; please take a 1 minute survey about this notification.

Printout

Thursday, May 28, 2020 3:19 PM

ERTS Emergency Response and Training Solutions

May 28, 2020

Florida Department of Environmental Protection (DEP)
Southwest District Office
13051 N. telecom Parkway
Suite 101
Temple Terrace, FL 33637-0926

cc: Jamie Arleo, FL DEP (jamie.arleo@floridadep.gov)
Shannon Kennedy, FL DEP (shannon.kennedy@floridadep.gov)

RE: Corrective Action Final Report

Responsible Party Information:
CCC Transportation
509 US Highway 92 E.
Auburndale, FL 33823
Phone: 863-967-7411

Incident Description: Diesel Fuel Release – Tractor Trailer
Incident Date / Time: May 14, 2020 / 1245 ET
Incident Location:
US Highway 41 and 21st Street East
Palmetto, FL
Manatee County

FL DEP #: 2020-2462

ERTS Project #: 112519

Dear Sir or Madam;

The following serves as the final report detailing the emergency response and corrective actions taken in response to the incident that occurred on May 14, 2020 at the above referenced location. A Site Map is provided in Appendix 1.

Incident Background:

On May 14, 2020 at 1245 ET, it was reported that a CCC Transportation tractor trailer was involved in a multi-vehicle accident at the above referenced location. The trucks diesel fuel saddle tank was damaged and released unknown amount of diesel fuel onto an area of the roadway and adjoining soils. No drains or waterways were reported to be impacted by this release.

Emergency Response:

On May 14, 2020 at 1325 ET, on behalf of CCC Transportation retained Emergency Response and Training Solutions (ERTS) to manage and oversee the above referenced incident. On May 14,

ERTS
11231 Phillips Industrial Blvd. Bldg. 1, Ste 300 • Jacksonville, FL 32256 • USA
phone number: 440.349.2700 | fax number: 440.349.6713
ertsonline.com

2020 at 1332 ET, ERTS dispatched HEPACO of Tampa, FL to assess and perform spill response activities at the site.

Regulatory Notifications:

On May 14, 2020 at 1719 ET, pursuant to FL DEP regulations, ERTS notified the Florida State Warning Point. Operator Nancy took receipt of the call and issued incident tracking number 2020-2462. On May 14, 2020 at 1812 ET, ERTS completed and submitted the Discharge Report Form (DRF) to FL DEP. In addition, in accordance with FL DEP and Section 403.0777, F.S., on May 14, 2020 at 1846 ET, ERTS completed and submitted a Public Notice of Pollution. A copy of the DRF and Public Notice of Pollution are provided in Appendix 2.

Corrective Action:

On May 14, 2020 at 1614 ET, HEPACO personnel arrived on site to assess and begin cleanup operations. Following arrival, HEPACO determined that approximately between 50 and 75-gallons of diesel fuel was released to four areas of the roadway: 10-feet (ft.) x 20-ft.; 1-ft. x 200-ft.; 5-ft. x 5-ft; and 1-ft. x 100-ft., and confirmed that no soils, drains, or waterways were impacted by the release. In addition, HEPACO reported that the fire department had previously used adjoining roadway soils to contain and absorb the impacts to the roadway. HEPACO personnel applied granular absorbents which were thoroughly worked-in to the diesel fuel impacted asphalt roadway. All impacted absorbents and soils were collected and placed into four, 55-gallon steel drums and transported offsite for disposal. Photographs of the corrective action activities are provided in Appendix 3.

Waste Disposal:

On May 14, 2020, HEPACO transported the four drums of non-hazardous solid waste to the Clark Environmental, Inc. facility in Mulberry, FL for proper disposal. Please see the disposal documentation provided in Appendix 4.

Conclusions and Recommendations:

No evidence was found that suggests any significant environmental impact remains on the site following corrective action. ERTS recommends that the incident be closed.

ERTS and CCC Transportation appreciate your assistance in this matter. If you have any questions regarding this project, please do not hesitate to contact me at (440) 349-2700 Extension 527.

Respectfully,
Emergency Response & Training Solutions

Thomas P. Sabol

Thomas Sabol
Project Manager

ERTS
11231 Phillips Industrial Blvd. Bldg. 1, Ste 300 • Jacksonville, FL 32256 • USA
phone number: 440.349.2700 | fax number: 440.349.6713
ertsonline.com

Appendix 1

Site Map

ERTS
11231 Phillips Industrial Blvd. Bldg. 1, Ste 300 • Jacksonville, FL 32256 • USA
phone number: 440.349.2700 | fax number: 440.349.6713
ertsonline.com



N

ERTS

SITE LOCATION MAP

Street Name: US-41 & 21st St. E.
City, State: Palmetto, FL
County: Manatee

ERTS Alert #: 112519
State Ref. # 2020-2462
NRC Rpt. # N/A

ERTS Emergency Response and Training Solutions

Appendix 2

DRF and Public Notice of Pollution

ERTS
11231 Phillips Industrial Blvd. Bldg. 1, Ste 300 • Jacksonville, FL 32256 • USA
phone number: 440.349.2700 | fax number: 440.349.6713
ertsonline.com

Department of Environmental Protection

2600 Blair Stone Road ♦ Tallahassee, Florida 32399-2400

DEP Form: 62-761.900(1)
Form Title: Discharge Report Form
Effective Date: January 2017
Incorporated in Rule 62-761.405, F.A.C.

DISCHARGE REPORT FORM

Complete all applicable blanks, and submit copies of any analytical or field test results confirming contamination to soils, surface water, or groundwater to the County via email or mail.

Facility ID Number (If Registered): n/a Date of Form Completion: 05/14/2002 Date of Discovery: 05/14/2002

Facility Name: CCC Transportation, LLC County: Manatee

Facility (Property) Owner: n/a Telephone Number: n/a

Owner Mailing Address: 509 US Highway 92 E, Auburndale, FL 33823

Location of Discharge (Facility Street Address): US-41 N 21st street east, Palmetto, fl Lat/Long: 27.5321597 / -82.560792

Date of receipt of any test or analytical results confirming a discharge: 11/29/19 Estimated number of gallons discharged: 75 gallons

Discharge affected: (Check all that apply)

- [x] Soil
- [ ] Drinking water well(s)
- [ ] Groundwater
- [ ] Shoreline
- [ ] Soil water (water body name) _____
- [x] Other (specify) Asphalt

Evidence of discharge: (Check all that apply)

- [ ] Visual observation of sheen
- [x] Visual observation of free product
- [ ] Results or receipt of results of analytical tests
- [ ] Spill or vehicle overfill > 25 gallons to a pervious surface
- [ ] Stained soils
- [ ] Other (explain in comments)

Method of discovery and confirmation of discharge: (Check all that apply, see rule language explanation on instructions for this form)

- [x] Visual observation
- [ ] Groundwater analytical results
- [ ] Closure/Closure sampling assessment
- [ ] Soil analytical results
- [ ] Surface water analytical results
- [ ] Other (specify) _____

Type of regulated substance discharged: (Check all that apply)

- [ ] Gasoline
- [x] Diesel
- [ ] Heating oil
- [ ] Kerosene
- [ ] Aviation gas
- [ ] Jet fuel
- [ ] Used/waste oil
- [ ] New motor/lube oil
- [ ] Pesticide
- [ ] Grade 5 & 6 residual oils
- [ ] Mineral acids (ASTs)
- [ ] Ammonia compound
- [ ] Chlorine compound
- [ ] Biofuel blends
- [ ] Unknown
- [ ] Other (specify) _____
- [ ] Hazardous substance (USTs) – write name or Chemical Abstract Service (CAS) #: _____

Discharge originated from a: (Check all that apply)

- [x] Tank
- [ ] Piping
- [ ] Spill bucket
- [ ] Dispenser
- [ ] Piping sump
- [ ] Dispenser sump
- [ ] Other secondary containment
- [ ] Fitting or pipe connection
- [ ] Valve
- [ ] Tank truck
- [ ] Vehicle or customer vehicle
- [ ] Aircraft
- [ ] Railroad tankcar
- [ ] Barge, tanker ship or other vessel
- [ ] Pipeline
- [ ] Drum
- [ ] Unknown
- [ ] Other (specify) _____

Cause of the discharge: (Check all that apply)

- [ ] Spill
- [ ] Overfill
- [ ] Corrosion
- [x] Puncture
- [ ] Material failure (crack, split, etc.)
- [ ] Material incompatibility
- [ ] Improper installation
- [ ] Loose connection
- [ ] Collision
- [ ] Vehicle accident
- [ ] Fire/explosion
- [ ] Vandalism
- [ ] Weather
- [ ] Human error
- [ ] Unknown
- [ ] Other (specify) _____

Actions taken in response to the discharge:

The contractor deployed absorbent materials. Swept them in, and collected the spent absorbents for disposal.

Comments:

Agencies notified (as applicable):

- [ ] Fire Department
- [ ] County Program _____
- [ ] District Office _____
- [x] State Watch Office 800-320-0519
- [ ] National Response Center 800-424-8802

To the best of my knowledge and belief, all information submitted on this form is true, accurate and complete.

Chris Lorbeer
Printed Name of Owner, Operator or Authorized Representative

Chris Lorbeer
Signature of Owner, Operator or Authorized Representative

Christopher Lorbeer

From: no-reply@dep.state.fl.us
Sent: Thursday, May 14, 2020 6:46 PM
To: ERTS; ERTS
Subject: Public Notice of Pollution - Initial Notice
Attachments: ATT00001.bin

ERTS Notice: This communication is from an [EXTERNAL] sender.
If this email looks suspicious, do **NOT** click or open any links or attachments in the email.

FLORIDA DEPARTMENT OF Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

Pollution Notice

Thank you for submitting a Public Notice of Pollution for a reportable Incident in compliance with Section 403.077, F.S.

Your DEP Incident ID is **5411**. Please use this ID during any future correspondence with the Department concerning this Incident.

To update the information you have entered please click the link the below:
Update My Notice

Type of Notice: Initial Report
Date of Notice: 05/14/2020

Incident Information
Name of Incident: 112519
State Watch Office Case Number:
Start of Incident: 05/14/2020 12:20
Incident is on-going as of: 05/14/2020 18:45

Incident Description
75-GALLON ULSD RELEASE

Incident Location
Facility/Installation Name: Roadway
Address Line 1: US-41 N 21st street east

Address Line 2:
Directions:
City: Palmetto
State: FL
Zip Code:
Coordinates (in decimal degrees):
Lat: 27.522, Long: -82.562
Click to view Incident Location
Impacted Counties: Manatee

Incident Reported By
Name: Chris Lorbeer
Title: dispatch
Phone: (440) 349-2700
E-mail Address: erts@ertsonline.com

On-Site Contact
Name: Chris Lorbeer
Phone: (440) 349-2700
Ext:
E-mail Address: erts@ertsonline.com

To view a list of all received Public Notices of Pollution or to modify your e-mail subscription settings, please click the link below:
Public Notice of Pollution

Florida Department of Environmental Protection



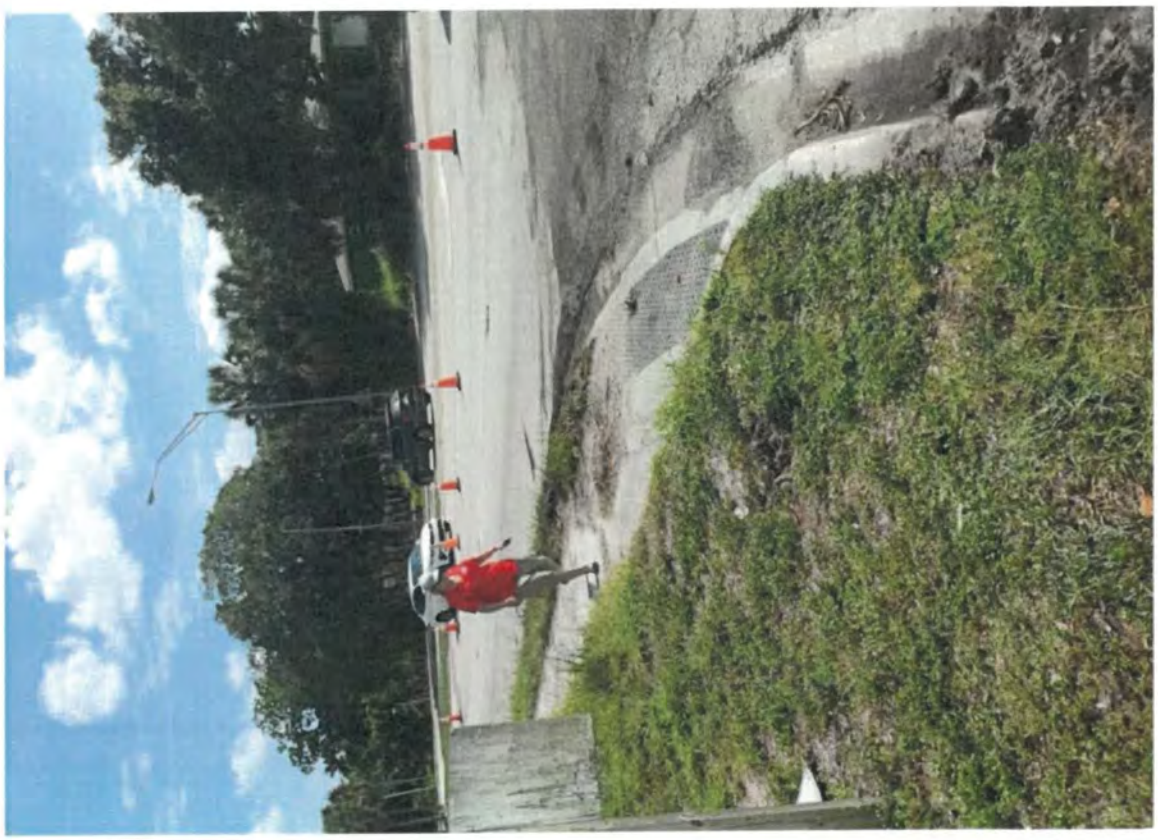
Appendix 3

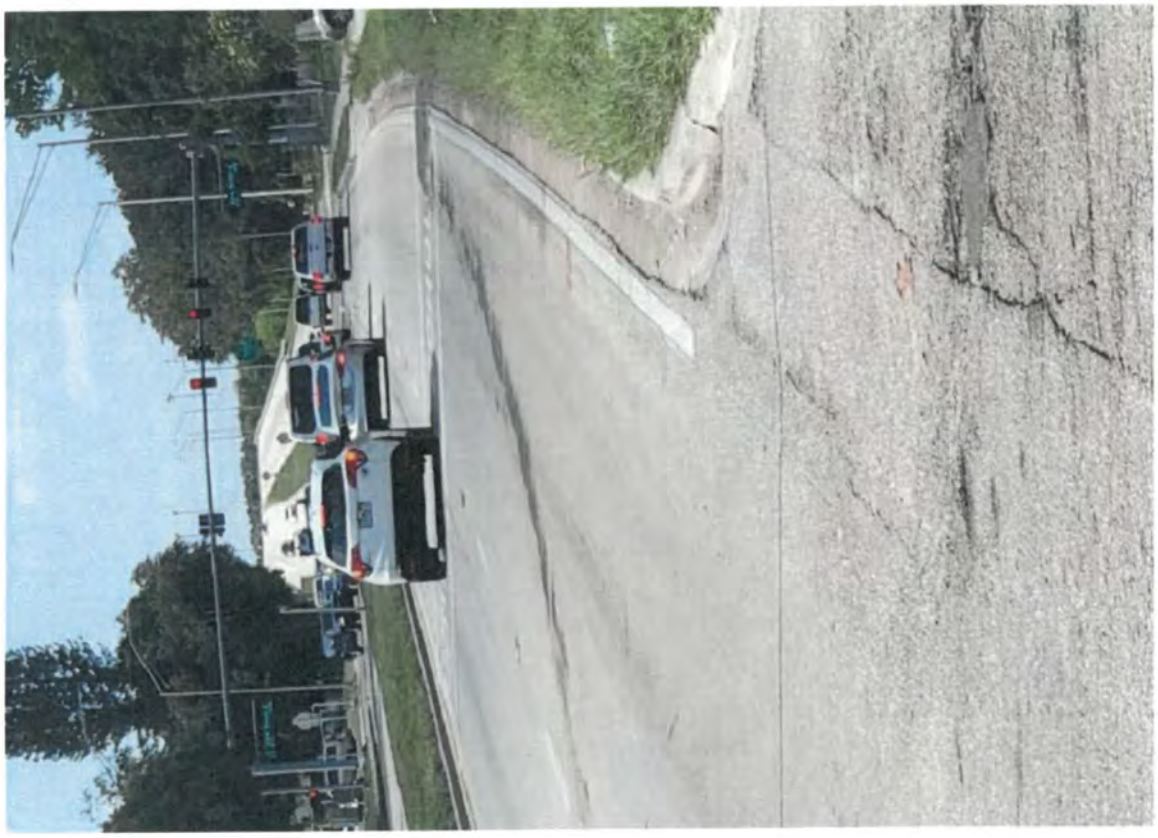
Photographs

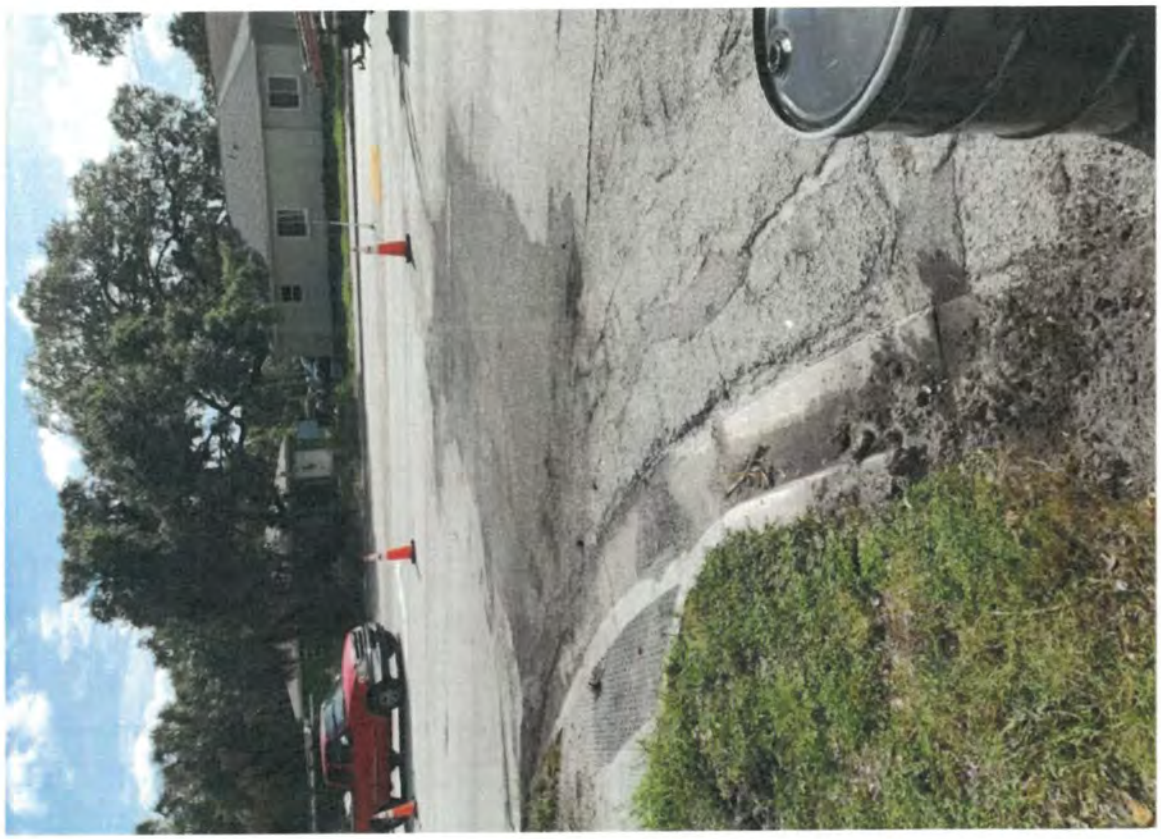
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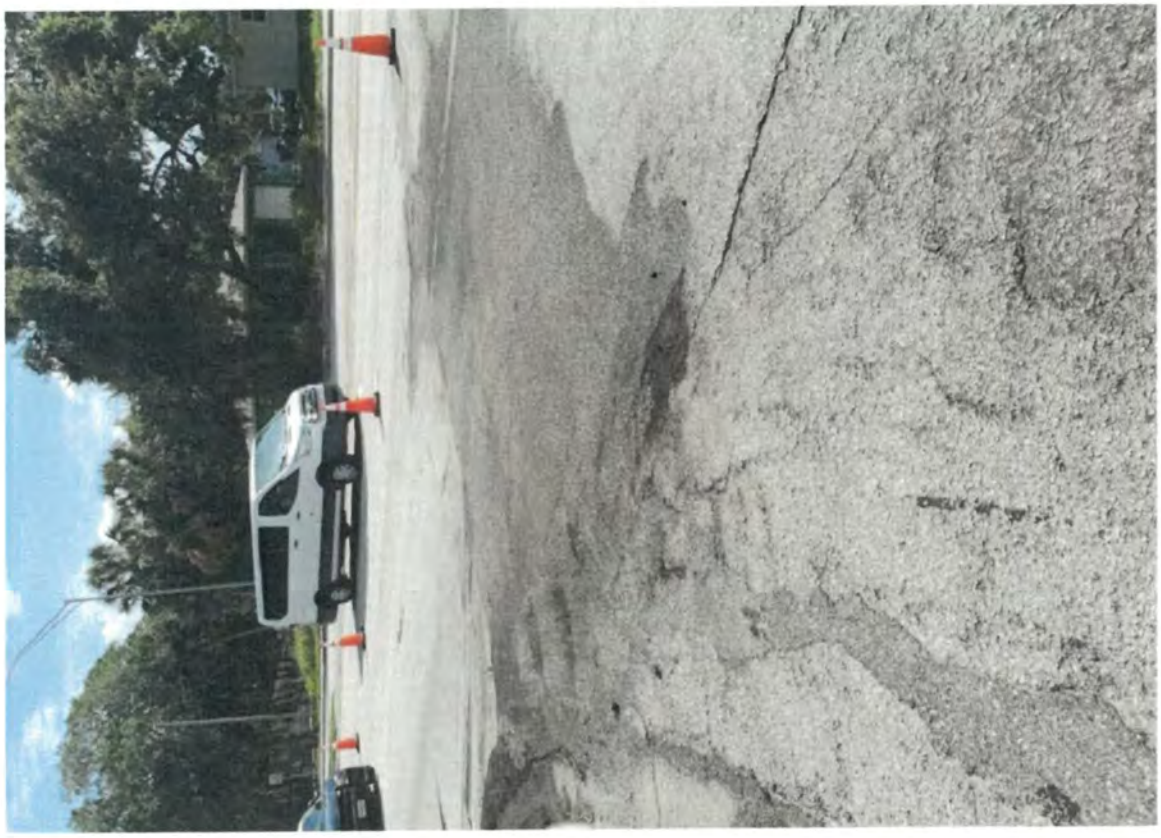






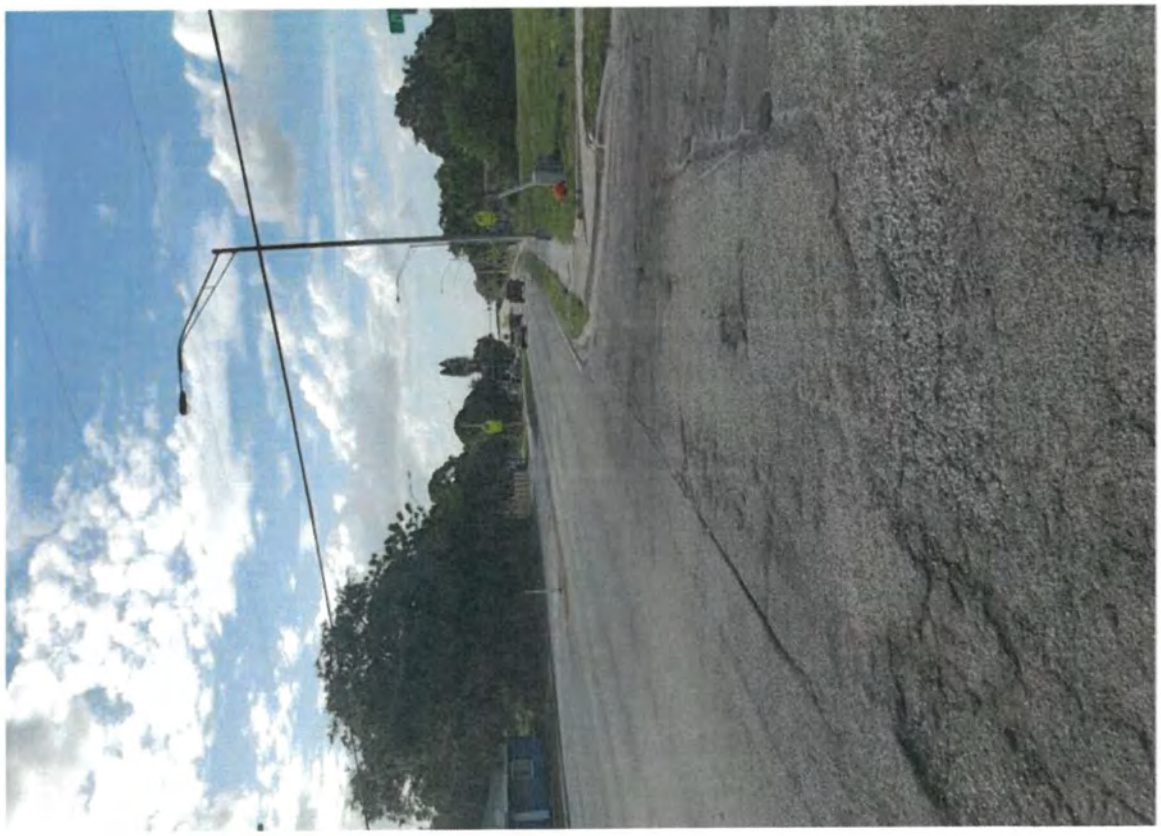












ERTS Emergency Response and Training Solutions

Appendix 3

Waste Disposal Documentation

ERTS
11231 Phillips Industrial Blvd. Bldg. 1, Ste 300 • Jacksonville, FL 32256 • USA
phone number: 440.349.2700 | fax number: 440.349.6713
ertsonline.com

HEPACO

2711 Burch Drive
Charlotte, NC 28269
Phone: 704-598-9782
Emergency: 800-888-7689

EPA ID Number: **NCD986194306**

Shipping Number

11945 L / S

Recyclable Material

Job # 2003.056047

Shipper Name: [illegible] **Date:** 5/11/26

Site Address: [illegible] **EPA ID#:** _____

HEPACO Truck #: _____ **Trailer #:** _____ **Project Manager:** [illegible]

Designated Facility Name [illegible] **EPA ID #** _____

Address _____ **Phone #** _____

Shipping Name (Material) Hazard Class, UN/NA Number, Packing Group	# of Containers	Container Type	Total Quantity	Units
UN1993, Flammable liquid, n.o.s. ( ) 3, PG III				
NA1993, Combustible liquid, n.o.s. ( ) Comb, PG III				
Non Regulated/ Non Hazardous Liquid ( )				
Non Regulated/ Non Hazardous Solid (Diesel Impacted Absorbent)	4	DM	2100	P

Remarks/ Comments: Billing Address: 5209 US 92 E Auburndale FL 33823
44915 DCC1

Shipper Representative	HEPACO Driver	Designated Facility
Print: [illegible]	Print: [illegible]	Print: [illegible]
Sign: [illegible]	Sign: [illegible]	Sign: [illegible]
Date: 5/11/26	Date: 5/11/26	Date: 44915 DCC1

For Accounting Use Only:

Site No. 67

Spill Site

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Emergency Response Incident Report

Incident #:	County:	Latitude:	Incident Date: 04/09/2006
2006-4I-4251Z	Manatee	Longitude:	Incident Time: 03:45 AM US/EASTERN

OER Employee Receiving Report:	OER Responses:	Reported Date: 04/09/2006
LetoBarone, Domenic	Phone, Followup	Reported Time: 04:11 AM US/EASTERN

Incident Reported By: Via SWO
Operator 134, Manatee Co. 911

Address:
FL US
Phones:
Business : 941-747-7776 Extn:
Contact Person:

Location of Incident:
US 41 North and 25th Street East

Nearest City/Town: PALMETTO

Threat to U.S Navigable Waters? No
Describe Threat:

Confirmed/Potential:

Descriptions:	Modes:	Media Affected:	Actions:
Vehicle Accident	Highway	Impervious surface	Absorbent used
Spill	Residential	Soil	Contractor hired
Other			

Incident Contractors:

Contractor Hired Responsible Party
Name: US Ecology
Address: 1783 West 9 Mile Road, Pensacola, FL 32534 PENSACOLA FL 32534 US
Phones:
Business : 800-899-4672 Extn:
DEP Contract#:

Incident Parties:

Company Name: Pat Salmon & Sons of Florida, Inc.
Party Type: Responsible Party,
Address:
1509 Pickettville Road JACKSONVILLE FL 32220 US
1509 Picketville Road JACKSONVILLE FL 32220 US
Phones:
Business : 904-781-4738 Extn:
Contact Person: Lamoununtain, Fred
Insurance Company:
Policy#:

Pollutants:

Pollutant Name	Category	Potential Amount	Actual Amount	Unit Of Measure	Determined By
Diesel fuel	Petroleum	190.00	30.00	gallon	Contractor

Coastal Category:	(Landward COLREG Line)	(Seaward COLREG Line)
No Minor	< 1000 gallons	< 10,000 gallons

No	Major	> 10,000 gallons	> 100,000 gallons

Agencies Responded: City of Plant City Police Department
Agencies Notified: City of Plant City Police Department

FOSC Notified: No **Date:** **FOSC Response:** No
Name of FOSC Notified: **Time:**

Narrative:
30 gallons of diesel has leaked out of a saddle tank on a tractor trailer due to a traffic crash. No clean up at this time. Fire Department is on scene. At this time, it is raining and the diesel is being washed away.

OER/State On-Scene Coordinator: **Date:** **Hours spent:**	**Federal On-Scene Coordinator:**
	*The above actions were properly taken and coordinated with the National Contingency Plan (NCP, 40 CFR 300)
ID# **Fax#**	**Fax#** **Date:**
Print **Sign:**	**Print** **Sign:**

OER Response Information

OER On-Scene Coordinator:	**Arrival Date:**	**Incident #:** 2006-4I-4251Z
	Arrival Time:	

PERSONNEL EXPENSES:

TRANSPORTATION EXPENSES:

PPE EXPENSES:

SAMPLING EQUIPMENT EXPENSES:

EXPENDABLE EXPENSES:

INSTRUMENTATION EXPENSES:

MISCELLANEOUS EXPENSES:

Incident Narrative:

4/9/06: Manatee County 911 notified the SWP of a vehicle accident on US 41 North and 25th Street East involving a semi and a passenger vehicle. The trucking company was identified as Pat Salmon & Sons of Florida, Inc. The Fire Department estimated 30-gallons of diesel was lost on the roadway due to a damaged saddle tank. At the time of the incident, heavy rain storms were washing the fuel away. BER contacted Pat Salmon and was informed that SWS, Inc. was tasked to perform cleanup.

4/10/06: Darryl King with SWS responded the morning of the incident. Eric Cooper will handle follow-up for SWS. Per Darryl, the Pat Salmon semi jack-knifed while traveling north on US 41, and punctured its saddle tank while crossing the median. The driver then proceeded south on US 41 to 24th Street East, where he finally came to rest. The semi was equipped with 2 x 95-gallon tanks. The passenger side remained full, and the drivers side was still 1/2 full. SWS estimated that 15-gallons impacted soil and 15-gallons impacted the roadway. Absorbents were applied to the roadway.

8/15/06: SWS hand delivered the SRR to BER. After review of the report all parameters were successfully met. OVA-FID readings were less than 10 ppm and all analytical results meet the Soil Cleanup Target Levels. Groundwater and surface water were not impacted as a result of this spill. 7.94 tons of contaminated soil was taken to Kleen Soil for disposal. The final excavation measured 22' x 5' x 1'. The area was backfilled and compacted to DOT standards. Manifest and other necessary documentation was provided in the SRR. Cleanup appears satisfactory. A NFA Letter will be submitted to Pat Salmon and Sons Trucking and cc to SWS. BER Case Closed

Approved By: Chris Rossbach **Date:** 08/17/2006

Site Nos. 70 and 71

Bridge Nos. 130080, 130081 and 130083

SUMMARY OF ACTIVITIES REPORT

ASBESTOS CONTAINING MATERIALS AND METALS BASED COATINGS ASSESSMENT

State Road 683 (US 301) from South of 25th Court East to South of 13th Avenue East
Bridge Nos. 130080, 130081 & 130083
Bradenton, Manatee County, Florida
FDOT Financial Project No.: 445144-1

Submitted to:
Florida Department of Transportation, District 1
801 North Broadway Avenue
P.O. Box 1249
Bartow, Florida 33831-1249

Submitted by:
NorthStar Contracting Group, Inc.
2760 S. Falkenburg Road
Riverview, Florida 33578
Telephone: (813) 684-4400

July 2022

SUMMARY OF ACTIVITIES REPORT

ASBESTOS CONTAINING MATERIALS
AND METALS BASED COATINGS ASSESSMENT

State Road 683 (US 301) from South of 25th Court East to South of 13th Avenue East
Bridge Nos. 130080, 130081 & 130083
Bradenton, Manatee County, Florida
Contract No.: BEA33
FDOT Financial Project No.: 445144-1
NorthStar Project Number: 4022110

Statement of Professional Review

This report has been reviewed and the work contained herein has been found to conform to commonly accepted procedures consistent with applicable standards of practice. No guarantee or warranty is expressed or implied.

Prepared by: _____ Date: 7/8/22
Bryce Fields
Staff Scientist

Reviewed by: Philip L. Glover Date: 7-8-22
Philip L. Glover, PG, LEP
Senior Geologist I

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4.1 Response Actions for MBC 5

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Figure 1 - Site Vicinity Map.
Figure 2 - Asbestos Sample Locations Map (Bridge No. 130083)
Figure 3 - Metals Based Coating Sample Locations Map (Bridge No. 130083)
Figure 4A - Asbestos Sample Locations Map (Bridge Nos. 130080 & 130081)
Figure 4B - Asbestos Sample Locations Map (Bridge Nos. 130080 & 130081)
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TABLES

1 Metals Based Coatings Analytical Summary
2 Metals Based Coatings Composite Sample Results

APPENDICES

I Health and Safety Plan
II Photographs
III Subcontractor Reports

1.0 INTRODUCTION

At the request of the Florida Department of Transportation (FDOT), NorthStar Contracting Group, Inc. (NorthStar) conducted asbestos-containing materials (ACM) and metals-based coatings (MBC) assessments to confirm the presence or absence of these materials on Bridge Nos. 130080, 130081 and 130083. This work was authorized under Letter of Authorization (LOA) FF to Contract No. BEA33. Potential ACM and MBC were required to be identified at the bridges prior to FDOT performing renovation or demolition activities, pursuant to the requirements under the Asbestos Hazard Emergency Response Act (AHERA), the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) under Section 112 of the Clean Air Act and the rules and requirements for lead based coating inspections under Title 40 of the Code of Federal Regulations Part 745 (40 CFR 745) and Title X of the 1992 Housing and Community Development Act.

The bridges are located along State Road 683 (US 301) from South of 25th Court East to South of 13th Avenue East in Bradenton, Manatee County, Florida. A Site Vicinity Map is provided as **Figure 1**. Sample locations maps presenting the ACM and MBC sample locations for Bridge Nos. 130080, 130081 and 130083 are included as **Figure 2** through **Figure 5**.

2.0 SUMMARY OF ACTIVITIES

2.1 Pre-Survey Activities

NorthStar personnel prepared a site-specific Health and Safety Plan (HASP) and coordinated ACM survey activities through Diversified Management Corporation, Inc. (DMC). NorthStar personnel conducted the MBC survey activities.

2.2 Survey Activities

On May 12, 2022, NorthStar and DMC personnel mobilized to Bridge Nos. 130080, 130081 and 130083 to conduct ACM and MBC survey activities. Prior to starting work, NorthStar personnel conducted a Health and Safety meeting in accordance with the HASP (pertinent excerpts of which are included in **Appendix I**). NorthStar personnel remained on-site to provide oversight and to provide Health and Safety support and supervision for DMC personnel. Photographs documenting site activities are provided as **Appendix II**.

The certified ACM inspector conducted a site walk of the bridges and identified homogeneous areas of suspect materials, *i.e.,* areas that appeared to have been constructed around the same time and from the same source of potential ACM. The survey methodology was based on the AHERA rules and procedures outlined in 40 CFR 763. The inspector identified eight (8) homogeneous areas of suspect ACM on Bridge No. 130083 and 9 (nine) homogeneous areas of suspect ACM on the bridge pair containing Bridge Nos. 130080 & 130081. Three (3) bulk samples were collected from each of the homogeneous areas listed above, and a total of 51 bulk samples were submitted for laboratory analysis. The approximate sampling locations are presented on **Figure 2, Figure 4A** and **Figure 4B.**

NorthStar's MBC inspector conducted a site walk of the bridges to identify any surface coatings that may contain lead, arsenic, cadmium, chromium or zinc. The survey methodology was based on "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing" [Department of Housing and Urban Development (HUD), 1995; 1997 for Chapter 7 Revision]. At Bridge No. 130083, three (3) samples were collected including white lane paint, yellow lane paint and white paint. At Bridge No. 130080, three (3) samples were collected including white lane paint, yellow lane paint and white paint. At Bridge No. 130081, four (4) samples were collected including white/black paint, white lane paint, yellow lane paint and white paint. The approximate sampling locations are presented on **Figure 3** and **Figure 5.**

The ACM and MBC inspectors also looked for the presence of faying surfaces, which are two (2) pieces of metal that are contacting each other such that the presence of ACM or MBC cannot be ascertained. Faying surfaces were not observed on any of the bridges.

2.3 Laboratory Analytical Methods

The ACM samples were submitted to Arrowhead Technologies, LLC, an independent laboratory accredited by the National Voluntary Laboratory Accreditation Program for bulk asbestos fiber analysis. The laboratory analyzed the samples for asbestos using polarized light microscopy and dispersion staining, in accordance with the procedures outlined in U.S. Environmental Protection Agency (USEPA) Method 600/R-93/116.

The MBC samples were submitted to Advanced Environmental Laboratories, Inc. (AEL), an accredited facility in Tampa, Florida, accredited by the National Environmental Laboratory Accreditation Program for metals analyses. The MBC samples were analyzed for arsenic, cadmium, chromium, lead and zinc by USEPA Method 6010. Additionally, three (3) composite samples (Comp 1 through Comp 3), were analyzed by the Toxicity Characteristic Leaching Procedure (TCLP) for arsenic, cadmium, chromium and lead. Sample PS-8 Yellow Lane Paint on Bridge No. 130081 was also analyzed by TCLP lead due to high total lead concentrations in this sample.

2.4 Survey Results

The laboratory analytical results indicated that asbestos was not detected in any of the 51 bulk samples collected from Bridge Nos. 130080, 130081 and 130083. In accordance with 40 CFR 763, all identified homogeneous areas were considered not to contain ACM because the results of samples collected from each homogeneous area indicated an asbestos content of 1 percent or less. A copy of the Asbestos Survey Report prepared by DMC is provided in **Appendix III**.

A summary of the laboratory analytical results for the MBC samples collected at Bridge No. 130083 (PS-1, PS-2 and PS-3), Bridge No. 130080 (PS-4, PS-5 and PS-6) and Bridge No. 130081 (PS-7, PS-8, PS-9 and PS-10) is provided in **Table 1**.

One (1) composite sample was collected from each of the bridges. Composite sample Comp 1 was comprised of MBC samples PS-1, PS-2, PS-3. Composite sample Comp 2 was comprised of MBC samples PS-4, PS-5, and PS-6. Composite sample Comp 3 was comprised of MBC samples PS-7, PS-8, PS-9 and PS-10. The composite samples were submitted to AEL for laboratory analyses. Sample analyses for composite samples Comp 1 through Comp 3 indicate the tested coatings, as an aggregate, do not contain metals concentrations above the TCLP Regulatory Levels (**Table 2**).

An elevated concentration of lead [7,800 milligram per kilogram (mg/kg)] was detected in sample PS-8 (**Table 1**). This concentration exceeded the federal criteria for lead based coatings. Due to the elevated total lead concentration, sample PS-8 was also analyzed for TCLP lead. The

TCLP lead results for PS-8 [4.1 milligrams per liter (mg/L)] indicates that the yellow lane paint on Bridge No. 130081 would be classified as a nonhazardous waste.

A copy of the report of a Comprehensive National Emission Standards for Hazardous Air Pollutants (NESHAP) demolition asbestos survey as prepared by DMC, laboratory analytical reports and chain of custody records for the ACM bulk samples and the MBC test results are provided in **Appendix III**.

3.0 CONCLUSION AND RECOMMENDATIONS

At the request of the FDOT, NorthStar provided ACM and MBC survey services on Bridge Nos. 130080, 130081 and 130083 in support of planned improvement activities. Based on the results of the ACM survey of Bridge Nos. 130080, 130081 and 130083 conducted by DMC on May 12, 2022, there did not appear to be any ACM present on the bridges that would impact construction activities. NorthStar therefore recommends no further ACM assessment or abatement activities for the bridges.

Based on the results of the MBC survey, sample analyses indicate the tested coatings contain metals above detectable levels, which could result in worker exposure. In particular, elevated concentrations of lead were detected in sample PS-8, which exceeded the federal criteria for lead based coatings.

Based on the TCLP results for the MBC samples, MBC waste generated in its current state would not require handling as a hazardous waste. However, any related waste generated during construction would require waste characterization testing, as removal processes (blasting, chemicals, etc.) may change the properties and classification of the waste media. For further information, see Section 4.0 Response Actions, below.

Although faying surfaces were not observed on the bridges, they may still be present within the structures. If identified during renovation or demolition activities, please contact the Project Engineer and the District Contamination Impact Coordinator for further direction.

Due to no asbestos being detected, a ten (10) day notification is not required for renovations; however, if demolition activities are performed, a 10-day notification is required. (A demolition is defined by regulatory standards as any building activity that involves the removal or alteration of load-bearing structures). In accordance with federal regulations, the notice must be sent to Ms. Shannon Lenhart at the Florida Department of Environmental Protection Southwest District, 13051 N. Telecom Parkway, Suite 101, Temple Terrace, Florida 33637-0926. Ms. Lenhart can also be reached at (813) 470-5939.

If the bridge renovation contractor encounters any material on any area of the bridges that may potentially contain ACM, renovation activities should be halted immediately and the FDOT District 1 District Contamination Impact Coordinator should be contacted at (863) 519-2375.

4.0 RESPONSE ACTIONS

4.1 Response Actions for MBC

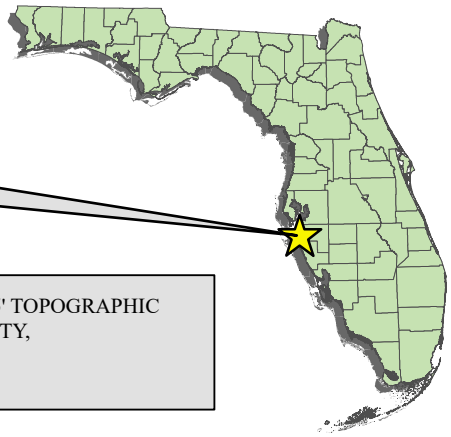
Contractors should perform demolition or renovation activities in a manner that will ensure workers are not exposed above the permissible exposure limits as specified by the Occupational Safety and Health Administration 29 CFR Subpart Z. Worker protection in the presence of metals or metals containing materials may include, but is not limited to, engineering controls, work-practice controls, hygiene facilities and practices, medical surveillance, medical removal protection for employees whose blood lead levels exceed a predetermined action limit, and employee training. Careful review and consideration of all applicable laws and regulations is recommended before determining what level of exposure exists at these bridges and what Occupational Safety and Health Administration (OSHA) standards should be applied to support compliance with federal regulatory standards. Operations such as blasting, sanding, grinding, burning or cutting the painted surfaces have the potential to produce airborne metals particles. Contractors should also ensure that paint chips are not released to the environment and are containerized and labeled for subsequent disposal.

Based on the TCLP results for MBC sample PS-8, the Yellow Lane Paint generated in its current state from renovation of Bridge No. 130081 would not be considered hazardous waste; however, waste characterization sampling will determine actual disposal requirements.

Because of the heavy traffic on the bridge, NorthStar recommends stabilization of the Yellow Lane Paint on Bridge No. 130081. Stabilization of this coating involves removing loose paint and other material from surfaces containing lead-based paint, and applying a new paint or protective coating over these surfaces. If cutting or grinding of the roadway surface is proposed, NorthStar recommends removal of the Yellow Lane Paint prior to cutting or grinding activities.

Based on previous estimates, the estimated cost for stabilization of the Yellow Lane Paint on Bridge No. 130081 is $30,000.00. The estimated cost for removal of the Yellow Lane Paint on Bridge No. 130081 is $60,000.00. Actual amounts may be less than stated depending on contractor support for maintenance of traffic and the methods utilized for stabilization or removal.

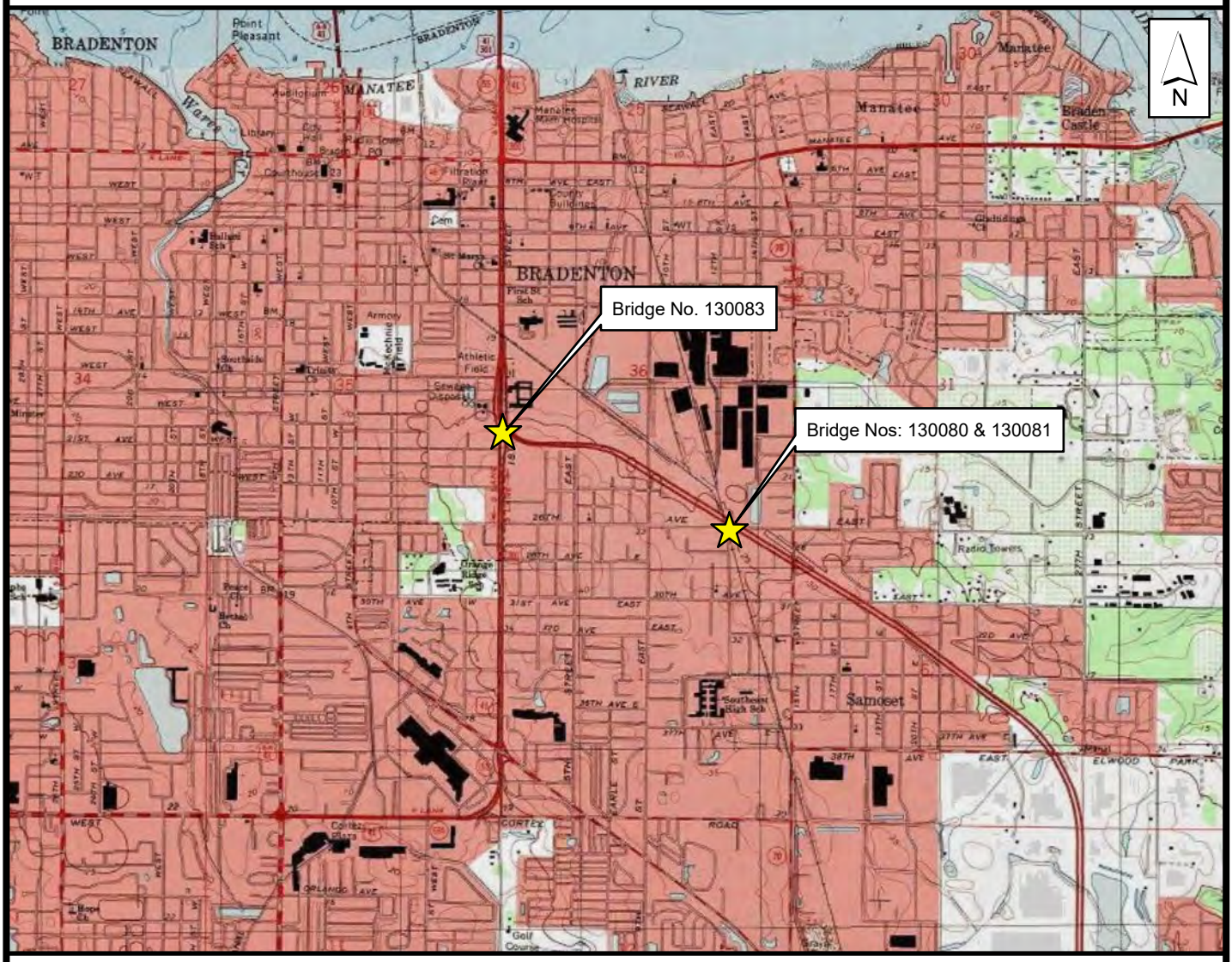
FIGURES



Site Location
US 301 from S of 25th Ave. E.,
Manatee County, Florida

UNITED STATES GEOLOGICAL SURVEY 7.5' TOPOGRAPHIC QUADRANGLE MAP FOR MANATEE COUNTY, BRADENTON QUADRANGLE, SECTION 36, TOWNSHIP 34 S, RANGE 17 E



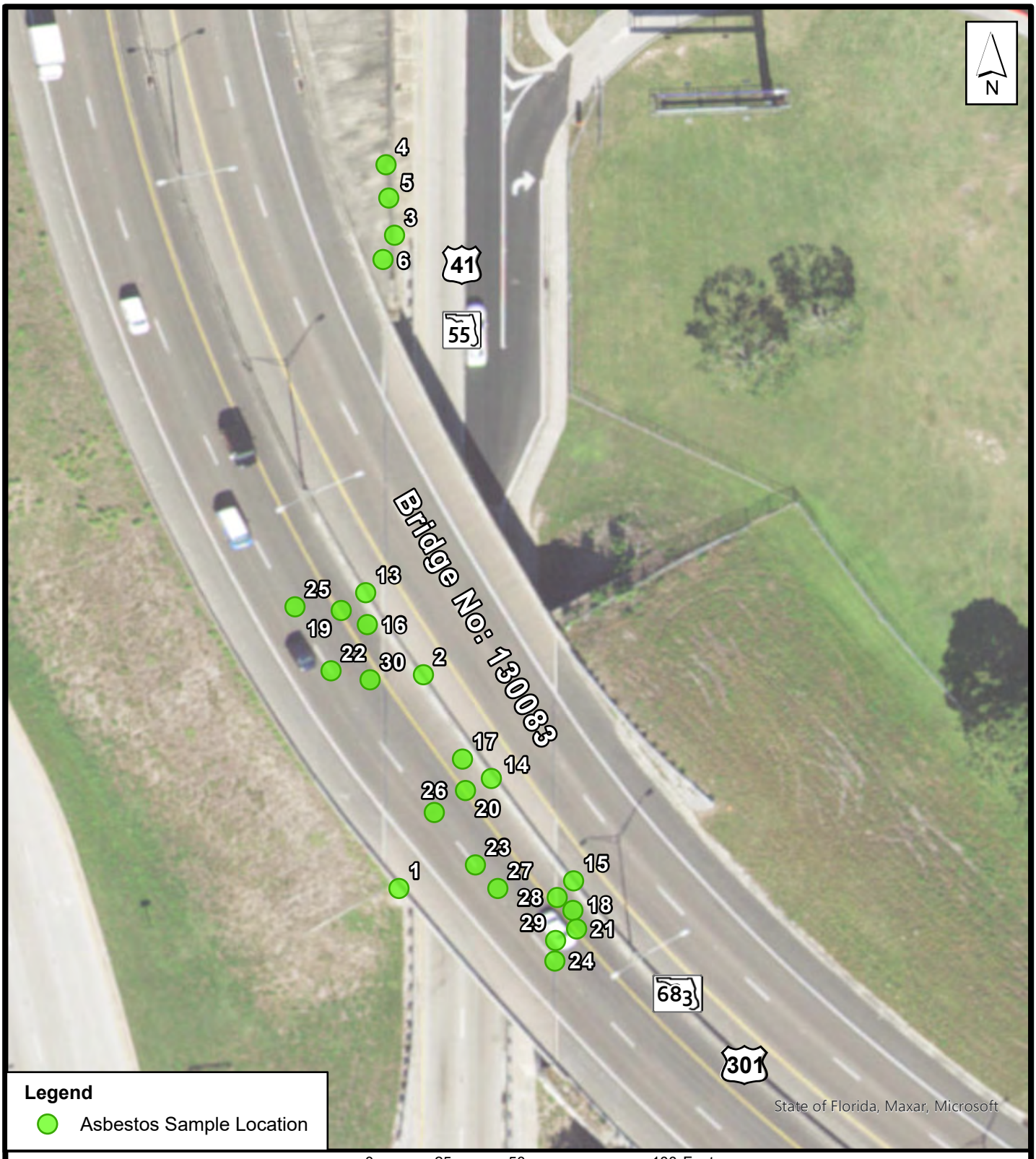


0 0.5 1 2 Miles

PROJECT NO.: 40-22-110		GIS ID: 4022110A001	PROJECT MANAGER: PHIL GLOVER, P.G.		
REVISION NO.: 00	REVISION DATE: N/A	DATE: 7/1/2022	DRN BY: RL	CHK BY: BF	STATUS: FINAL

NorthStar
Contracting Group, Inc.
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FIGURE 1
SITE VICINITY MAP
SR 683 (US 301) FROM SOUTH OF 25TH CT. EAST
TO SOUTH OF 13TH AVE. EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO.: 445144-1



PROJECT NO.: 40-22-110		GIS ID: 4022110A002	PROJECT MANAGER: PHIL GLOVER, P.G.		
REVISION NO.: 00	REVISION DATE: N/A	DATE: 7/1/2022	DRN BY: RL	CHK BY: BF	STATUS: FINAL

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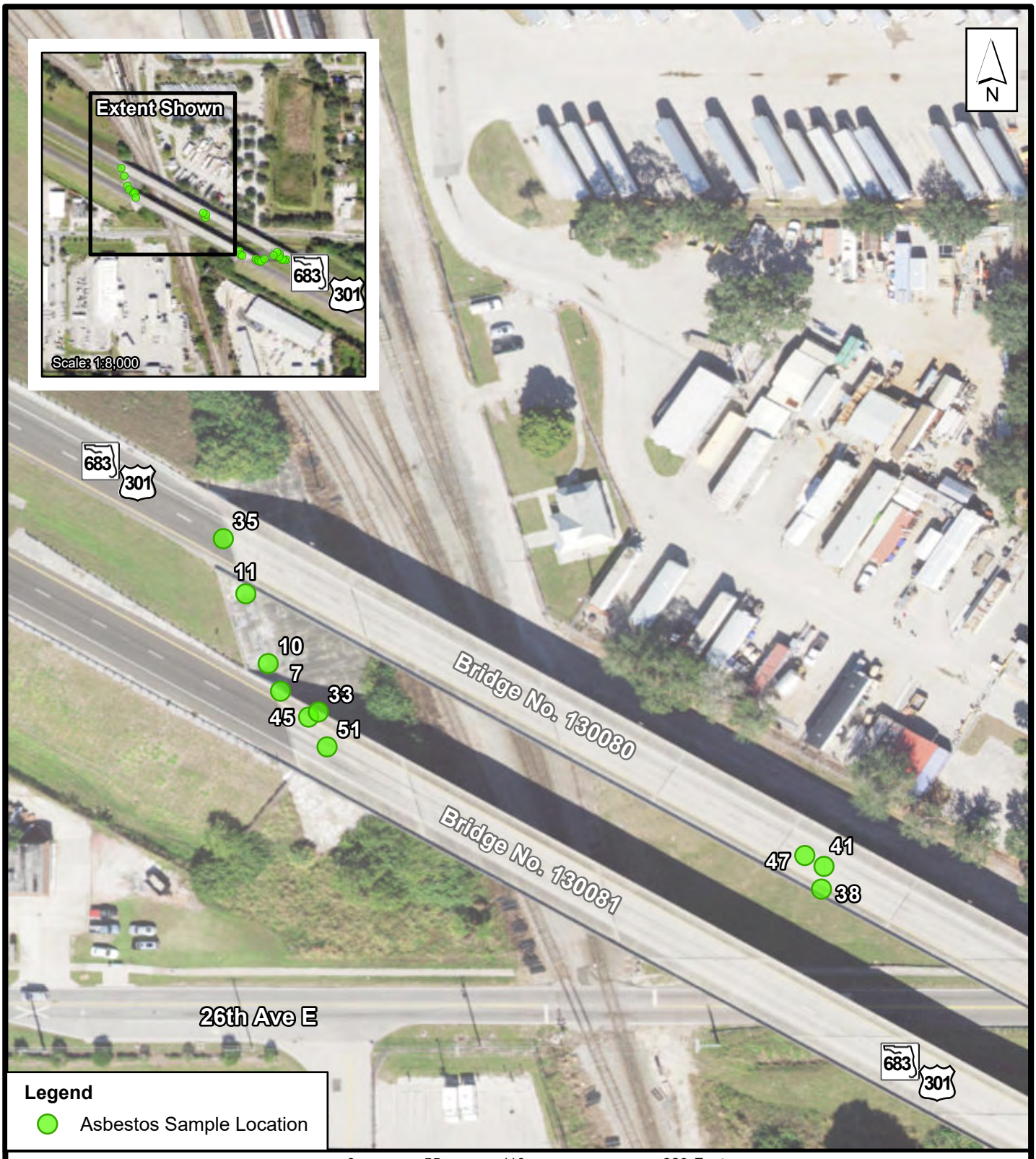
FIGURE 2
ASBESTOS SAMPLE LOCATIONS MAP
BRIDGE NO.:130083
SR 683 (US 301) FROM SOUTH OF 25TH CT. EAST
TO SOUTH OF 13TH AVE. EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO.: 445144-1



PROJECT NO.: 40-22-110		GIS ID: 4022110A003	PROJECT MANAGER: PHIL GLOVER, P.G.		
REVISION NO.: 00	REVISION DATE: N/A	DATE: 7/1/2022	DRN BY: RL	CHK BY: BF	STATUS: FINAL

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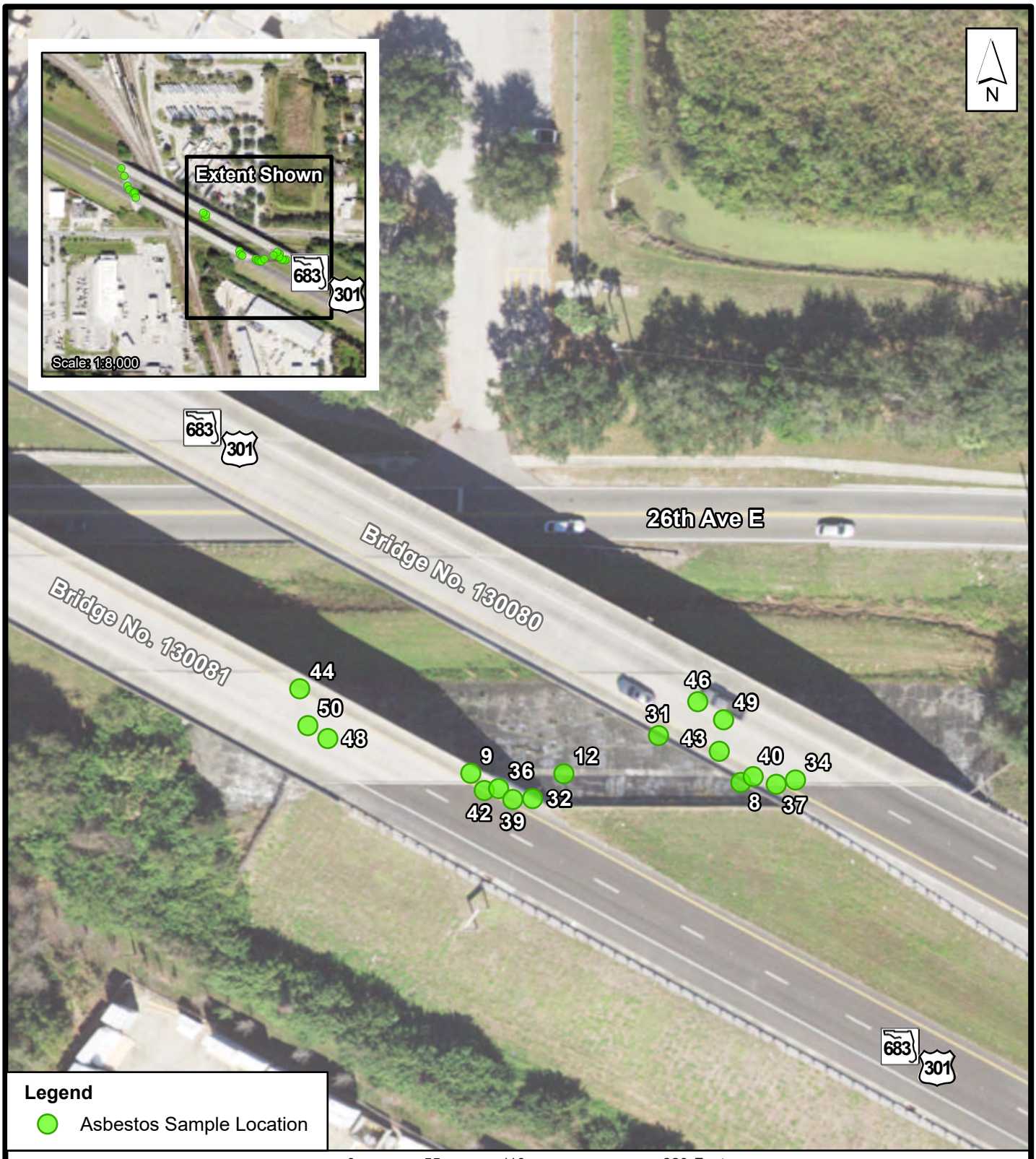
FIGURE 3
METALS BASED COATING SAMPLE LOCATIONS MAP
BRIDGE NO.:130083
SR 683 (US 301) FROM SOUTH OF 25TH CT. EAST
TO SOUTH OF 13TH AVE. EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO.: 445144-1



PROJECT NO.: 40-22-110		GIS ID: 4022110A004	PROJECT MANAGER: PHIL GLOVER, P.G.		
REVISION NO.: 00	REVISION DATE: N/A	DATE: 7/1/2022	DRN BY: RL	CHK BY: BF	STATUS: FINAL

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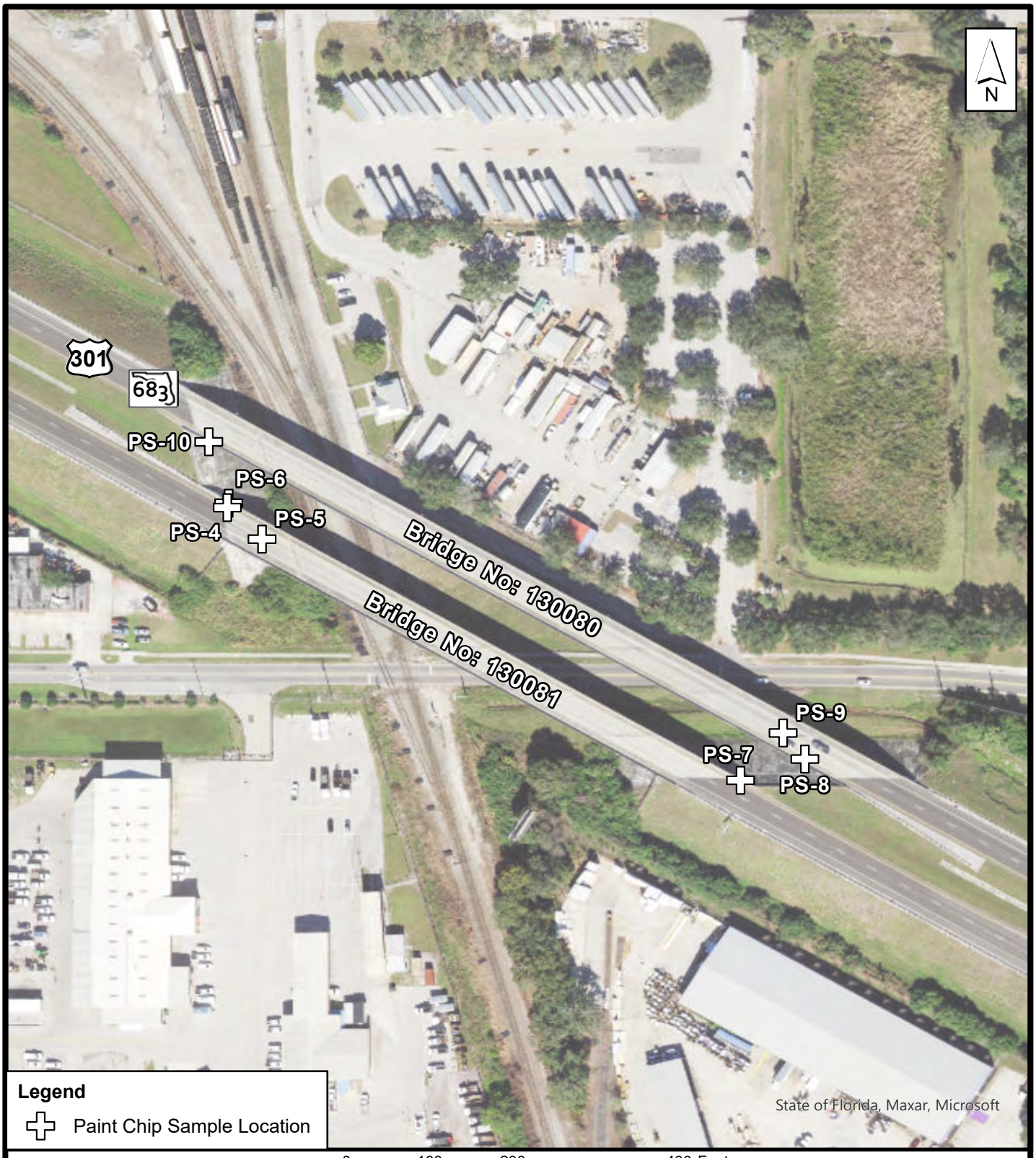
FIGURE 4A
ASBESTOS SAMPLE LOCATIONS MAP
BRIDGE NOS.:130080 & 130081
SR 683 (US 301) FROM SOUTH OF 25TH CT. EAST
TO SOUTH OF 13TH AVE. EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO.: 445144-1



PROJECT NO.: 40-22-110		GIS ID: 4022110A004B	PROJECT MANAGER: PHIL GLOVER, P.G.		
REVISION NO.: 00	REVISION DATE: N/A	DATE: 7/1/2022	DRN BY: RL	CHK BY: BF	STATUS: FINAL

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FIGURE 4B
ASBESTOS SAMPLE LOCATIONS MAP
BRIDGE NOS.:130080 & 130081
SR 683 (US 301) FROM SOUTH OF 25TH CT. EAST
TO SOUTH OF 13TH AVE. EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO.: 445144-1



PROJECT NO.: 40-22-110		GIS ID: 4022110A005	PROJECT MANAGER: PHIL GLOVER, P.G.		
REVISION NO.: 00	REVISION DATE: N/A	DATE: 7/1/2022	DRN BY: RL	CHK BY: BF	STATUS: FINAL

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FIGURE 5
METALS BASED COATING SAMPLE LOCATIONS MAP
BRIDGE NOS.: 130080 & 130081
SR 683 (US 301) FROM SOUTH OF 25TH CT. EAST
TO SOUTH OF 13TH AVE. EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO.: 445144-1

TABLES

TABLE 1
Metals Based Coatings Analytical Summary

State Road 683 (US 301) from South of 25th Court East to South of 13th Avenue East
Bridge Nos. 130083, 130081 and 133080
Bradenton, Manatee County, Florida
FDOT Financial Project No. 445144-1

		Bridge No. 130083			Bridge No. 130080			Bridge No. 130081			
	Sample ID	PS-1	PS-2	PS-3	PS-4	PS-5	PS-6	PS-7	PS-8	PS-9	PS-10
Metal	Location	Yellow Lane Paint	White Lane Paint	White Paint	Yellow Lane Paint	White Lane Paint	White Paint	White/Black Paint	Yellow Lane Paint	White Lane Paint	White Paint
Arsenic	-	0.12 U	0.12 U	0.66	0.12 U	0.13 U	0.13 U	0.22 I	0.12 U	0.13 U	0.21 I
Cadmium	-	0.025 U	0.024 U	0.14	0.36	0.025 U	0.033 I	0.22	0.18	0.35	0.16
Chromium	-	0.20 U	0.19 U	6.3	1200	0.25	0.81	6.1	2100	4.0	5.1
Lead	-	0.47	0.21 I	11	4900	0.48	3.3	12	**7800**	17	4.6
Zinc	-	2.3 I	1.8 I	85	27	4.2	10	81	37	96	26

Notes:
All concentrations reported in milligrams of constituent per kilogram of paint (mg/kg)
U = The compound was analyzed for but not detected.
I = The reported value is between the laboratory method detection limit and the practical quantitation limit.
Bolded values exceed the federal criteria for lead based paint.

TABLE 2
Metals Based Coatings Composite Sample Results

State Road 683 (US 301) from South of 25th Court East to South of 13th Avenue East
Bridge Nos. 130083, 130081 and 133080
Bradenton, Manatee County, Florida
FDOT Financial Project No. 445144-1

		Sample ID	Sample ID	Sample ID
Metal	**TCLP Regulatory Level, mg/L**	**Comp 1 (PS-1, PS-2 and PS-3) Bridge No. 130083**	**Comp 2 (PS-4, PS-5 and PS-6) Bridge No. 130080**	**Comp 3 (PS-7, PS-8, PS-9 and PS-10) Bridge No. 130081**
Arsenic	5.0	0.0080 U	0.0080 U	0.0080 U
Cadmium	1.0	0.0010 U	0.0010 U	0.0010 U
Chromium	5.0	0.050 U	0.29	0.25
Lead	5.0	0.030 U	2.2	1.3

Metal	**TCLP Regulatory Level, mg/L**	**Bridge 130081 Yellow Lane Paint PS-8**
Arsenic	5.0	NA
Cadmium	1.0	NA
Chromium	5.0	NA
Lead	5.0	4.1

Notes:
TCLP = Toxicity Characteristic Leachate Procedure
mg/L = milligrams per liter
NA = Not analyzed.
I = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
U = The compound was analyzed for but not detected.

APPENDIX I

HEALTH AND SAFETY PLAN

Health and Safety Plan

US 301 from South of 25th Court East

FPID 445144-1 / 444120-1 / 444211-1

FDOT Contract Number: BEA33

ACM/MBC Surveys

2760 South Falkenburg Road

Riverview, Hillsborough County, Florida

NorthStar

TARGET ZERO
COMMITTED TO SAFETY

Health and Safety Plan Approvals

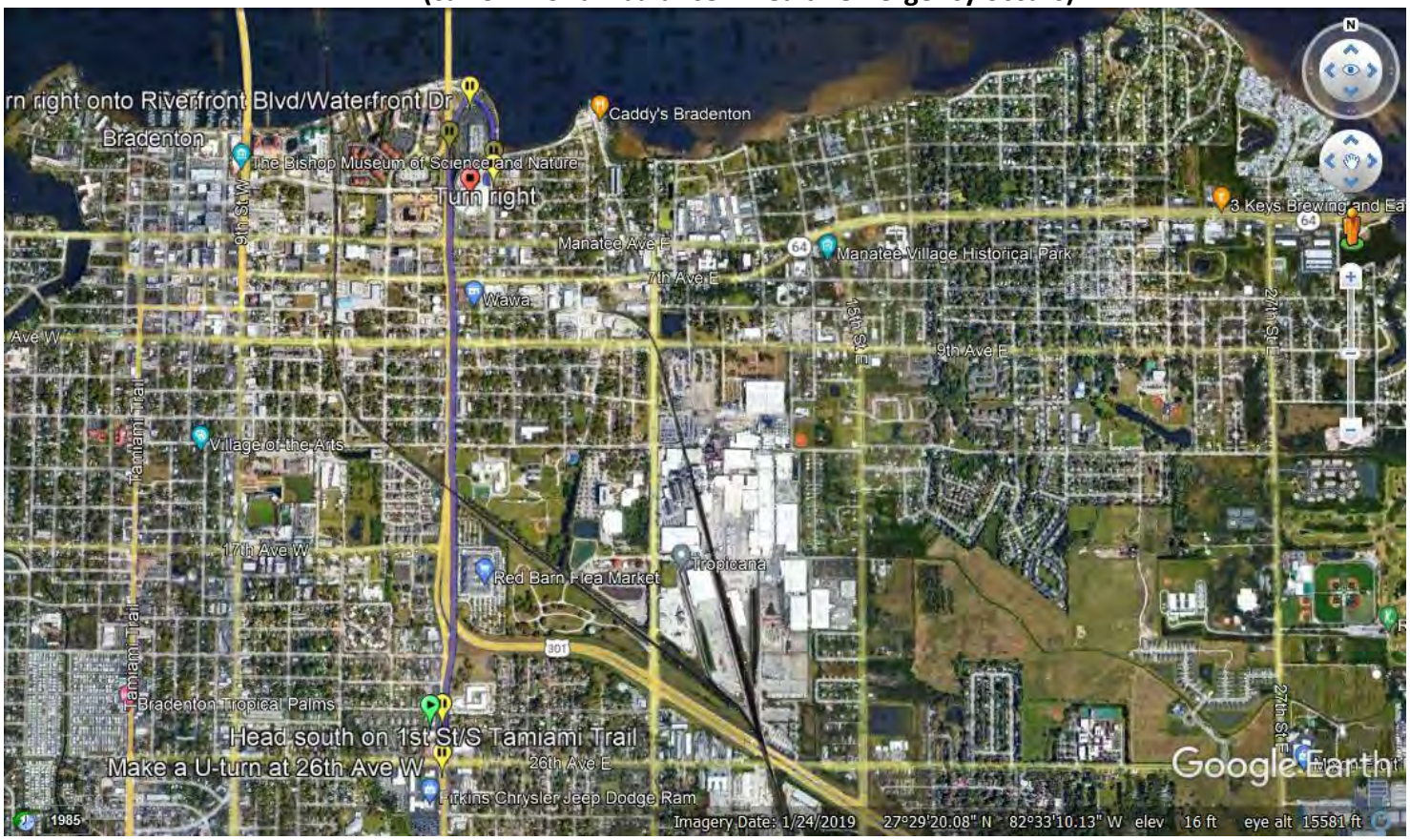
Scheduled Start-up Date: **5/12/22**	Scheduled Start-up Time: **0900 EST**
Project Name: **US 301 from South of 25th Court**	Site Location: Bradenton, Manatee County, Florida
By signing below, the specific technical and management solutions to work site hazards prescribed herein are approved, and we commit to providing a work environment in line with NorthStar's vision of Safety – First and Always.	
Health and Safety Plan Author: Bryce Fields	
Signature:	Date: 5/11/22
Health and Safety Plan Approval	
Project Manager: Phil Glover PG, LEP	
Signatures:	Date: 5/11/22

2.0 Project Contact Information

2.1 PROJECT CONTACTS			
Project Title	US 301 from South of 25th Court East		
Scope of Work	• Metal Based Coatings and Asbestos Surveys		
Key Personnel			
Project Manager	Philip L. Glover	Phone	(813) 323-5750
Superintendent		Phone	
Site Safety Officer	Bryce Fields	Phone	(813) 410-4132
NorthStar Claims Reporting	Corporate EHS	Phone	(409) 886-3959
Fire Department / EMS	Bradenton Fire Department	Phone	(941) 932-9600
Ambulance Service	Various	Phone	911
Hospital (Urgent Care)	Sunshine Urgent Care	Phone	(941) 896-8676
Hospital (EMERGENCY)	Manatee Memorial Hospital	Phone	(941) 746-5111

2.2 EMERGENCY AND INCIDENT RESPONSE	
Dial 911 from a cellular phone for the following: ✓ **Occupational injury or illness that may require emergency treatment.** ✓ **Fires.** ✓ **Spill or release** **All incidents MUST be reported to the Health and Safety Manager immediately.**	
Telephone location	Employees carry cellular phones
Site address	**US 301 and S. Tamiami Trail**
Nearest Hospital (w/ Emergency Room)	Manatee Memorial Hospital 206 2nd Street East Bradenton, FL 34208 1.8 miles, 10 minutes 1. Head north on US 301 for 1.5 miles 2. Turn right onto Riverfront Blvd. for 0.3 miles 3. Continue onto 2nd Street East for 171 feet 4. Hospital is on the right

Map route to Manatee Memorial Hospital: Emergency Room
(call 911 for ambulance if health emergency occurs)



The referenced hospital location will be used to provide medical treatment in the event of an injury requiring treatment services beyond the capabilities of on-site first aid. On-site NorthStar personnel maintain current First Aid / CPR training certifications and can administer first aid services. First aid kits are available in work areas and in the on-site emergency stations. All injuries regardless of severity must be immediately reported to the Health and Safety Representative. Injuries requiring emergency medical treatment or ambulance services must be reported to facility project manager.

2.3	EMERGENCY AND INCIDENT RESPONSE
Urgent Care Clinic	Sunshine Urgent Care 2100 Manatee Avenue West Bradenton, FL 34205 2.25 miles, 10 minutes 1. Head north on US 301 for 1 mile 2. Turn left onto Manatee Avenue for 1.25 miles 3. Urgent care clinic is on the right

Map Route to Sunshine Urgent Care



The referenced Urgent Care Clinic will be used to provide medical treatment for non-life threatening injuries that are beyond the capabilities of on-site first aid. First aid kits are available in work areas and in the on-site emergency stations. All injuries regardless of severity must be immediately reported to the Site Safety Officer.

2.3 Emergency Rally Points

2.3.1 Facility Evacuation Meeting Point

The evacuation meeting point will be the singular point all employees are to meet at in the event of a site evacuation. Once at the meeting point the NorthStar Superintendent will take a head count to ensure all personnel have safely evacuated. The location of the meeting point will be selected during the Tailgate safety meeting conducted by the Superintendent or Health and Safety Officer prior to beginning work each day. The rally point will vary depending on site conditions and wind direction.

2.3.2 Emergency Communications

Communication of the emergency on site will be provided through the use of verbal communication, hand signals, and cell **phones.**

NorthStar

Date: 5/12/22	Job Name: US 301 from South of 75th Ct E

1. Work to be completed: ACM/MBC
2. Hazards associated with this work: ACM/MBC, traffic, dehydration, slips/trips/falls
3. Hazard control measures to be implemented: Level D PPE, general awareness, MOT, proper hydration

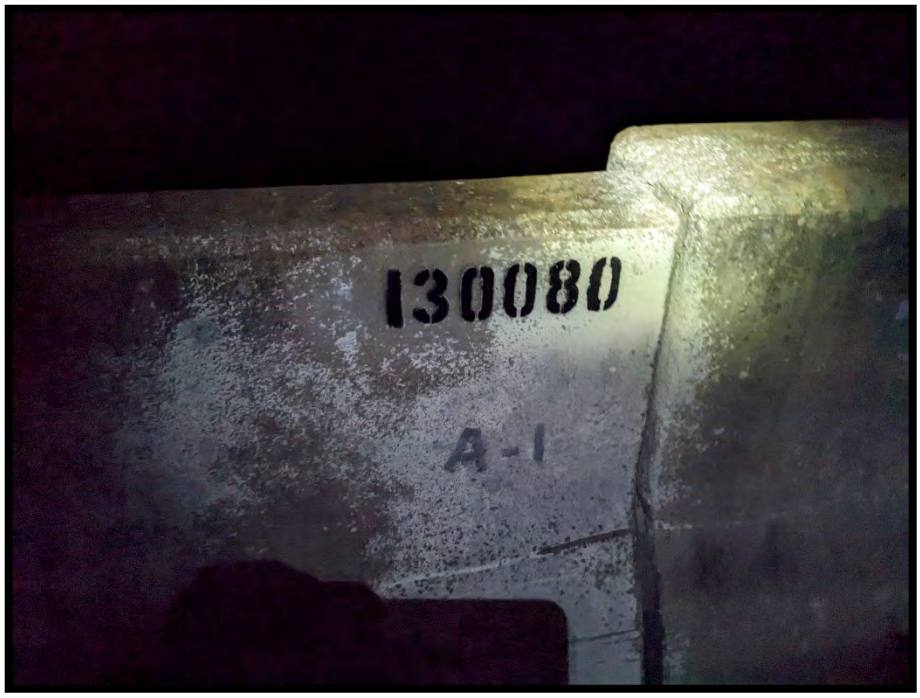
SAFETY TOPICS PRESENTED	
Protective Clothing/Equipment:	Level D PPE
Chemical Hazards:	ACM/MBC (Asbestos & Metals)
Physical Hazards:	Traffic, slips/trips/falls
Emergency Procedures:	Mob to nearest medical facility & notify office

ATTENDEES		
Print Name:	Signature:	Date:
MIKE BRASKAW		5.12.22
Israel Figueroa		↓
Rafael Resendiz		

Meeting Conducted by		
Print Name:	Signature:	Date:
Bryce Fields		5/12/22

APPENDIX II

PHOTOGRAPHS



Photograph 1
View of Bridge No. 130080.



Photograph 2
View of Bridge No. 130081.

Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 1 & 2
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 3
View of Bridge No. 130083.



Photograph 4
View of Asbestos Homogeneous Area 1 – Concrete Structure – Deck, Beams, Pilings and Abutments– Bridge 130083 (Sample Location 1).

Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 3 & 4
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 5
View of Asbestos Homogeneous Area 1 – Concrete Structure – Deck, Beams, Pilings and Abutments– Bridge 130083 (Sample Location 2).



Photograph 6
View of Asbestos Homogeneous Area 1 – Concrete Structure – Deck, Beams, Pilings and Abutments– Bridge 130083 (Sample Location 3).

Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 5 & 6
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 7
View of Asbestos Homogeneous Area 2 – Black Mastic at Joints – Embankments – Bridge 130083
(Sample Location 4).



Photograph 8
View of Asbestos Homogeneous Area 2 – Black Mastic at Joints – Embankments – Bridge 130083
(Sample Location 5).

Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 7 & 8
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 9
View of Asbestos Homogeneous Area 2 – Black Mastic at Joints – Embankments – Bridge 130083
(Sample Location 6).



Photograph 10
View of Asbestos Homogeneous Area 3 – Concrete Structure – Deck, Beams, Pilings and Abutments - Bridge Pair 130080 & 130081
(Sample Location 7).

Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 9 & 10
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 11
View of Asbestos Homogeneous Area 3 – Concrete Structure – Deck, Beams, Pilings and Abutments - Bridge Pair 130080 & 130081 (Sample Location 8).



Photograph 12
View of Asbestos Homogeneous Area 3 – Concrete Structure – Deck, Beams, Pilings and Abutments - Bridge Pair 130080 & 130081 (Sample Location 9).

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SITE PHOTOGRAPHS 11 & 12
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 13
View of Asbestos Homogeneous Area 4 – Black Mastic at Joints – Embankments – Bridge Pair 130080 & 130081 (Sample Location 10).



Photograph 14
View of Asbestos Homogeneous Area 4 – Black Mastic at Joints – Embankments – Bridge Pair 130080 & 130081 (Sample Location 11).

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SITE PHOTOGRAPHS 13 & 14
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 15
View of Asbestos Homogeneous Area 4 – Black Mastic at Joints – Embankments – Bridge Pair 130080 & 130081 (Sample Location 12).



Photograph 16
View of Asbestos Homogeneous Area 5 – Concrete with Cat 5 Coating – Roadway Barriers - Bridge 130083 (Sample Location 13).

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SITE PHOTOGRAPHS 15 & 16
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 17
View of Asbestos Homogeneous Area 5 – Concrete with Cat 5 Coating – Roadway Barriers - Bridge 130083 (Sample Location 14).



Photograph 18
View of Asbestos Homogeneous Area 5 – Concrete with Cat 5 Coating – Roadway Barriers - Bridge 130083 (Sample Location 15).

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SITE PHOTOGRAPHS 17 & 18
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 19
View of Asbestos Homogeneous Area 6 – Asphalt – Roadway Deck - Bridge 130083
(Sample Location 16).



Photograph 20
View of Asbestos Homogeneous Area 6 – Asphalt – Roadway Deck - Bridge 130083
(Sample Location 17).

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SITE PHOTOGRAPHS 19 & 20
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 21
View of Asbestos Homogeneous Area 6 – Asphalt – Roadway Deck - Bridge 130083
(Sample Location 18).



Photograph 22
View of Asbestos Homogeneous Area 7 – Yellow Lane Paint – Roadway Deck – Bridge 130083
(Sample Location 19).

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SITE PHOTOGRAPHS 21 & 22
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 23
View of Asbestos Homogeneous Area 7 – Yellow Lane Paint – Roadway Deck – Bridge 130083
(Sample Location 20).



Photograph 24
View of Asbestos Homogeneous Area 7 – Yellow Lane Paint – Roadway Deck – Bridge 130083
(Sample Location 21).

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SITE PHOTOGRAPHS 23 & 24
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 25
View of Asbestos Homogeneous Area 8 – White Lane Paint – Roadway Deck – Bridge 130083
(Sample Location 22).



Photograph 26
View of Asbestos Homogeneous Area 8 – White Lane Paint – Roadway Deck – Bridge 130083
(Sample Location 23).

Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 25 & 26
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 27
View of Asbestos Homogeneous Area 8 – White Lane Paint – Roadway Deck – Bridge 130083
(Sample Location 24).



Photograph 28
View of Asbestos Homogeneous Area 9 – Reflector Mastic – Roadway Deck - Bridge 130083
(Sample Location 25).

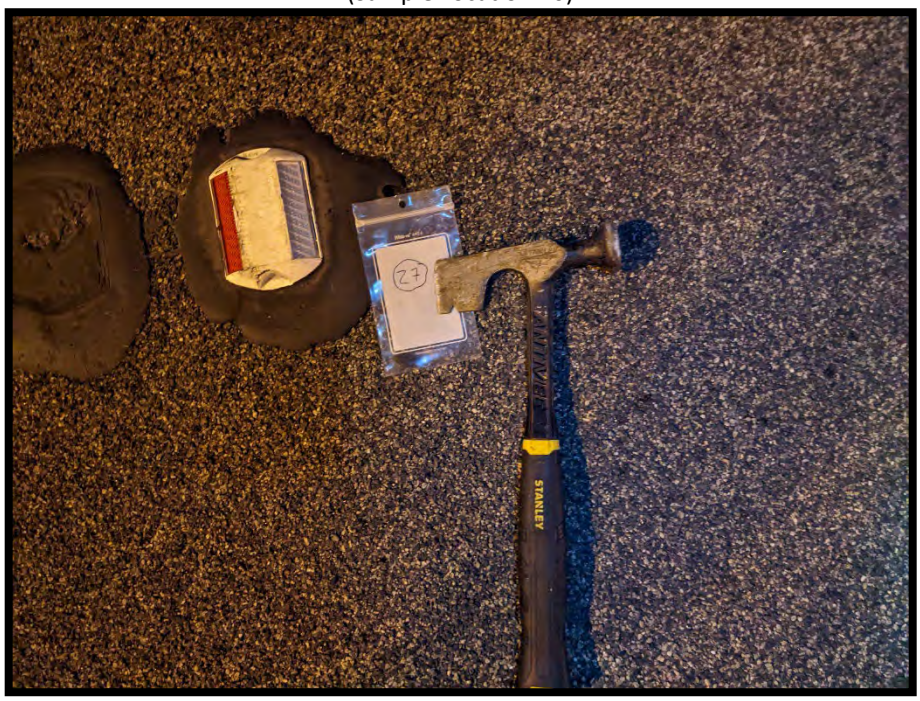
Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 27 & 28
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 29
View of Asbestos Homogeneous Area 9 – Reflector Mastic – Roadway Deck - Bridge 130083
(Sample Location 26).



Photograph 30
View of Asbestos Homogeneous Area 9 – Reflector Mastic – Roadway Deck - Bridge 130083
(Sample Location 27).

Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 29 & 30
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 31
View of Asbestos Homogeneous Area 10 – Expansion Joint – Roadway Deck - Bridge 130083
(Sample Location 28).

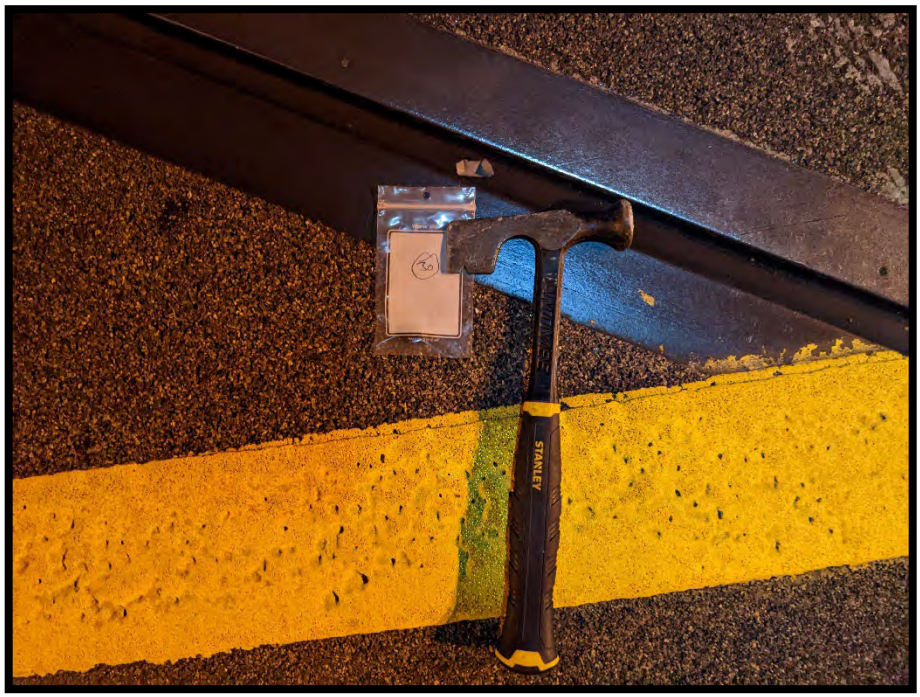


Photograph 32
View of Asbestos Homogeneous Area 10 – Expansion Joint – Roadway Deck - Bridge 130083
(Sample Location 29).

Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 31 & 32
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 33
View of Asbestos Homogeneous Area 10 – Expansion Joint – Roadway Deck - Bridge 130083
(Sample Location 30).



Photograph 34
View of Asbestos Homogeneous Area 11 – Concrete with Cat 5 Coating – Roadway Barriers - Bridge Pair 130080 & 130081
(Sample Location 31).

Project No. 4022110	ID:	DATE: 5/12/2022

NORTHSTAR CONTRACTING GROUP, INC.
2760 FALKENBURG ROAD, RIVERVIEW, FLORIDA 33578
PH:(813) 684-4400

SITE PHOTOGRAPHS 33 & 34
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 35
View of Asbestos Homogeneous Area 11 – Concrete with Cat 5 Coating – Roadway Barriers - Bridge Pair 130080 & 130081 (Sample Location 32).



Photograph 36
View of Asbestos Homogeneous Area 11 – Concrete with Cat 5 Coating – Roadway Barriers - Bridge Pair 130080 & 130081 (Sample Location 33).



Photograph 37
View of Asbestos Homogeneous Area 12 – Asphalt – Bridge Approaches, Roadway - Bridge Pair 130080 & 130081 (Sample Location 34).



Photograph 38
View of Asbestos Homogeneous Area 12 – Asphalt – Bridge Approaches, Roadway - Bridge Pair 130080 & 130081 (Sample Location 35).

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SITE PHOTOGRAPHS 37 & 38
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Photograph 39
View of Asbestos Homogeneous Area 12 – Asphalt – Bridge Approaches, Roadway - Bridge Pair 130080 & 130081 (Sample Location 36).



Photograph 40
View of Asbestos Homogeneous Area 13 – Concrete – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 37).

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SITE PHOTOGRAPHS 39 & 40
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
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Photograph 41
View of Asbestos Homogeneous Area 13 – Concrete – Roadway Deck - Bridge Pair 130080 & 130081
(Sample Location 38).



Photograph 42
View of Asbestos Homogeneous Area 13 – Concrete – Roadway Deck - Bridge Pair 130080 & 130081
(Sample Location 39).

Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 41 & 42
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 43
View of Asbestos Homogeneous Area 14 – Expansion Joint – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 40).



Photograph 44
View of Asbestos Homogeneous Area 14 – Expansion Joint – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 41).

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SITE PHOTOGRAPHS 43 & 44
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FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 45
View of Asbestos Homogeneous Area 14 – Expansion Joint – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 42).



Photograph 46
View of Asbestos Homogeneous Area 15 – Yellow Lane Paint – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 43).

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SITE PHOTOGRAPHS 45 & 46
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Photograph 47
View of Asbestos Homogeneous Area 15 – Yellow Lane Paint – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 44).



Photograph 48
View of Asbestos Homogeneous Area 15 – Yellow Lane Paint – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 45).

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SITE PHOTOGRAPHS 47 & 48
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BRADENTON, MANATEE COUNTY, FLORIDA
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Photograph 49
View of Asbestos Homogeneous Area 16 – White Lane Paint – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 46).



Photograph 50
View of Asbestos Homogeneous Area 16 – White Lane Paint – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 47).

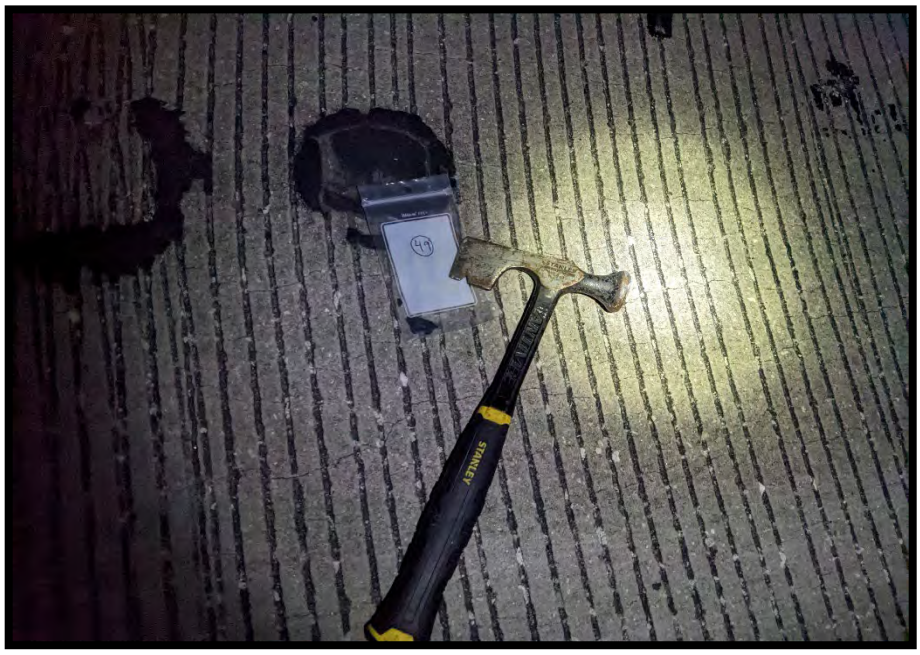
Project No. 4022110	ID:	DATE: 5/12/2022

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SITE PHOTOGRAPHS 49 & 50
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Photograph 51
View of Asbestos Homogeneous Area 16 – White Lane Paint – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 48).



Photograph 52
View of Asbestos Homogeneous Area 17 – Reflector Mastic – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 49).



Photograph 53
View of Asbestos Homogeneous Area 17 – Reflector Mastic – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 50).



Photograph 54
View of Asbestos Homogeneous Area 17 – Reflector Mastic – Roadway Deck - Bridge Pair 130080 & 130081 (Sample Location 51).

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Photograph 55
View of Metal Based Coatings Sample PS-1 Yellow Lane Paint – Bridge 130083.



Photograph 56
View of Metal Based Coatings Sample PS-2 White Lane Paint – Bridge 130083

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SITE PHOTOGRAPHS 55 & 56
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BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1



Photograph 57
View of Metal Based Coatings Sample PS-3 White Paint – Bridge 130083

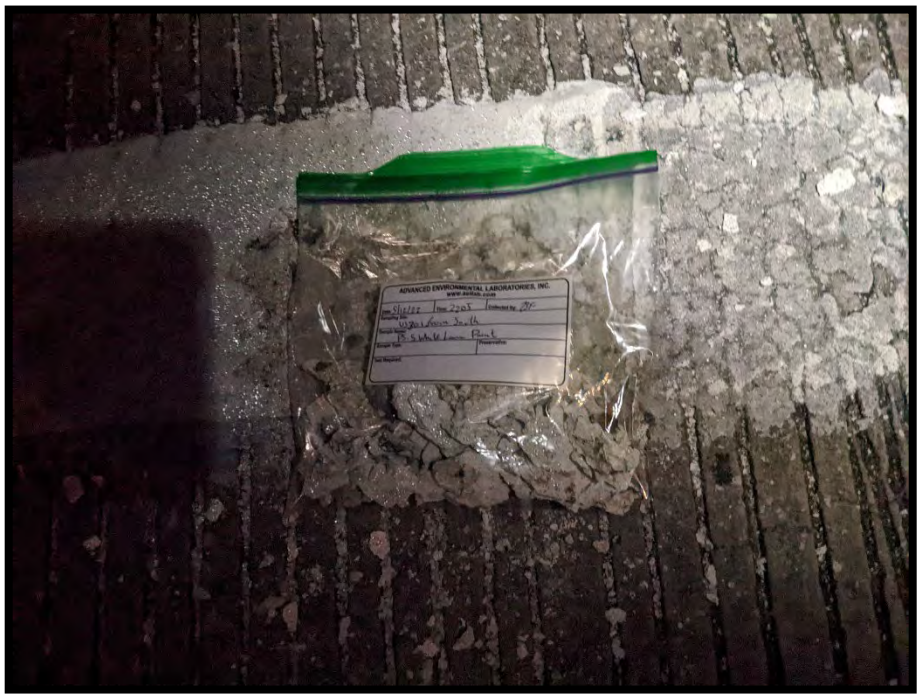


Photograph 58
View of Metal Based Coatings Sample PS-4 Yellow Lane Paint – Bridge 130080

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SITE PHOTOGRAPHS 57 & 58
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Photograph 59
View of Metal Based Coatings Sample PS-5 White Lane Paint – Bridge 130080

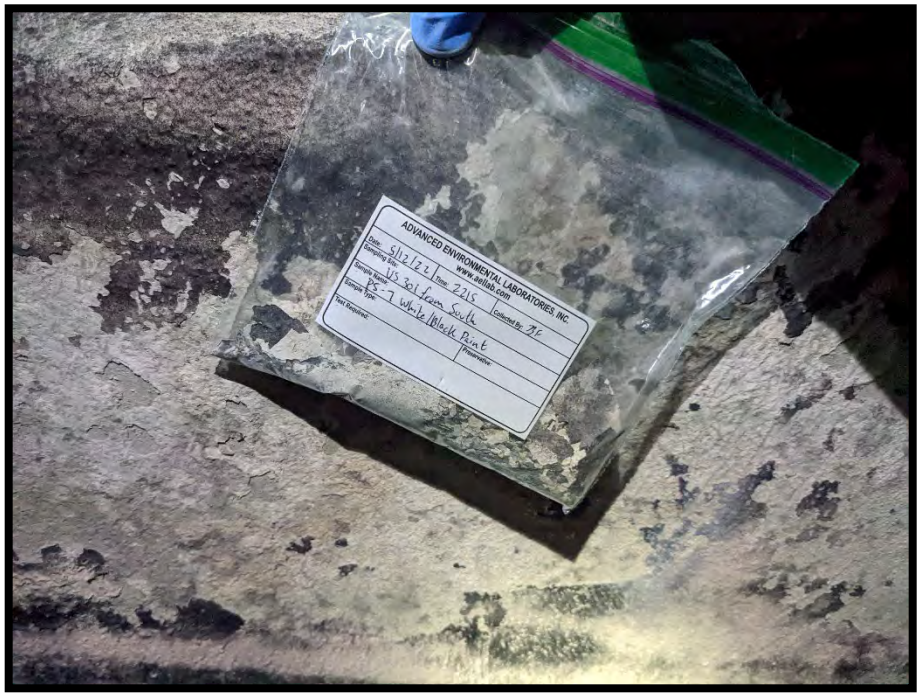


Photograph 60
View of Metal Based Coatings Sample PS-6 White Paint– Bridge 130080

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SITE PHOTOGRAPHS 59 & 60
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BRADENTON, MANATEE COUNTY, FLORIDA
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Photograph 61
View of Metal Based Coatings Sample PS-7 White/Black Paint – Bridge 130080



Photograph 62
View of Metal Based Coatings Sample PS-8 Yellow Lane Paint – Bridge 130081

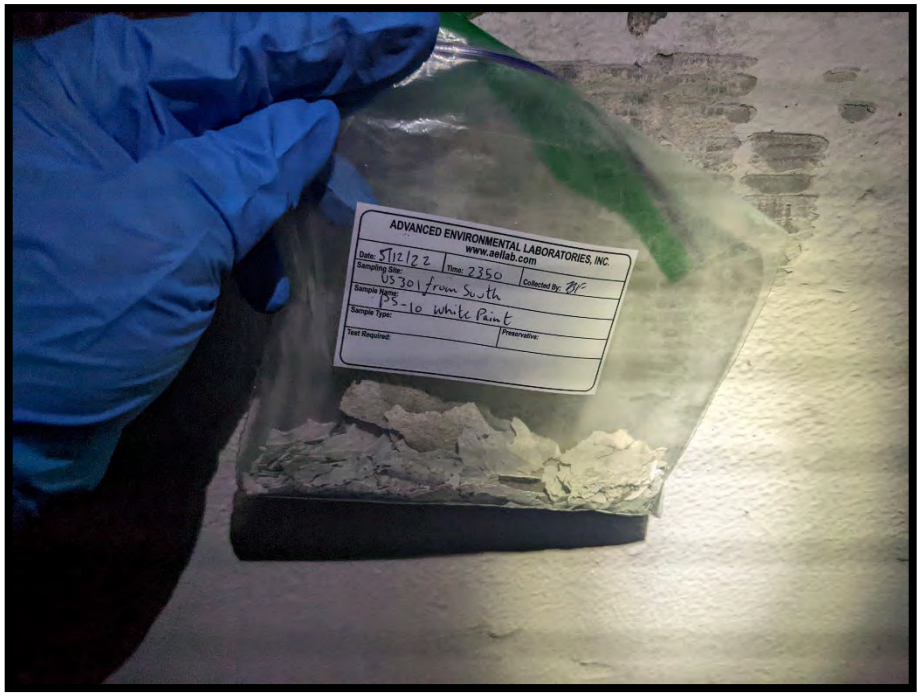
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SITE PHOTOGRAPHS 61 & 62
SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
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Photograph 63
View of Metal Based Coatings Sample PS-9 White Lane Paint – Bridge 130081



Photograph 64
View of Metal Based Coatings Sample PS-10 White Paint– Bridge 130081

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SR 683 (US 301) FROM SOUTH OF 25TH COURT EAST
TO SOUTH OF 13TH AVENUE EAST
BRADENTON, MANATEE COUNTY, FLORIDA
FDOT FINANCIAL PROJECT NO. 445144-1

APPENDIX III

SUBCONTRACTOR REPORTS



REPORT OF A COMPREHENSIVE NESHAP DEMOLITION ASBESTOS SURVEY FOR
BRIDGES Nos. 130080, 130081 & 130083
US 301
BRADENTON, MANATEE COUNTY, FLORIDA

PREPARED FOR:

NorthStar Contracting Group, Inc.
2760 South Falkenburg Road
Riverview, Florida 33578

Attn: Mr. Philip L. Glover, PG, LEP
Senior Geologist I

DMC PROJECT NO. 22-043

MAY 19, 2022

REPORT OF A COMPREHENSIVE NESHAP DEMOLITION ASBESTOS SURVEY FOR
BRIDGES Nos. 130080, 130081 & 130083
US 301
BRADENTON, MANATEE COUNTY, FLORIDA

PREPARED FOR:

NorthStar Contracting Group, Inc.
2760 South Falkenburg Road
Riverview, Florida 33578

Attn: Mr. Philip L. Glover, PG, LEP
Senior Geologist I

PREPARED BY:

Diversified Management & Construction
P.O. Box 270010
Tampa, Florida 33688

DMC Project No. 22-043
Florida Asbestos Business License No. ZA0000231

DATE:

May 19, 2022



05.19.22

_____

J. Michael Bradshaw, P.E. Date
Florida- Licensed Asbestos Consultant
EA0000066

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Appendix A: PLM Laboratory Results
Appendix B: Licenses & Certifications
Appendix C: Limitations
Appendix D: QA/QC Procedures and Results

1.0 EXECUTIVE SUMMARY

Diversified Management and Construction (DMC) has completed the comprehensive NESHAP demolition survey for asbestos-containing materials (ACM) of bridges nos. 130080, 130081 & 130083 located along US 301 Bradenton, Manatee County, Florida.

Based on our survey and sampling, no materials were found to be asbestos-containing.

Full results appear in the following report.

2.0 BACKGROUND INFORMATION

2.1 Introduction

DMC, Inc. was retained by NorthStar Contracting Group, Inc. to perform a comprehensive NESHAP demolition survey for asbestos-containing materials (ACM) of bridges nos. 130080, 130081 & 130083 located along US 301 Bradenton, Manatee County, Florida. The asbestos survey was authorized by Mr. Philip Glover of NorthStar and was performed by Mr. J. Michael Bradshaw of DMC on May 12, 2022.

2.2 Scope of Services

The scope of this work included the following tasks:

- Document review and facility personnel interviews;
- On-site investigative survey and sampling;

- Preparation of a comprehensive demolition asbestos survey report.

3.0 DESCRIPTION OF FACILITIES

The bridge nos. 130080, 130081 & 130083 are located along US 301 in Bradenton, Manatee County, Florida. The bridges are constructed of reinforced concrete and supported by reinforced concrete decks, beams, pilings, and abutments. The roadway surfaces included concrete/asphalt decks with asphalt roadway approaches.

4.0 SAMPLING AND ANALYTICAL PROCEDURE

During this survey, DMC's EPA/State of Florida accredited inspector, Mr. J. Michael Bradshaw performed a walk-through of the entire bridge structures in question. This was performed in order to identify and delineate locations of homogeneous materials suspected of containing asbestos prior to renovation/demolition activities. A homogeneous material is identified as a material that presents similar distinguishing features such as color, texture, etc. and which was installed during the same general time period.

Once homogeneous areas were identified, bulk samples were collected by DMC's EPA/State of Florida accredited inspector from these areas in order to confirm the presence or absence of asbestos in suspect materials. A total of 51 bulk samples were collected from 17 homogeneous areas.

Bulk samples were sent to Arrowhead Technologies in Clearwater, Florida for laboratory analysis. This independent laboratory successfully participates in the National Voluntary Laboratory Accreditation Program (NVLAP) for bulk asbestos sample analysis. The samples were analyzed using Polarized Light Microscopy (PLM) analysis methodology coupled with dispersion staining solutions to distinguish the unique optical properties of mineral forms.

Employing this method of analysis allows asbestos fiber characteristics to colorize, which enables the microscopist to verify the presence or absence, quantity, and type of asbestos in the samples. Any product that contains greater than one (1) percent asbestos is considered to be an asbestos-containing material (ACM) as defined by EPA and OSHA regulations. The PLM results are provided in **Appendix A** to this report. Our laboratory QA/QC procedures and results are provided in **Appendix D.**

5.0 NON-ASBESTOS CONTAINING MATERIALS

Samples of the following materials were analyzed and found to be **non-**asbestos-containing by Arrowhead Technologies (5 samples were selected for QA/QC analysis and the results are provided in Appendix D):

Non-ACM ***Bridges Nos. 130080, 130081 & 130083*** US 301 Bradenton, Manatee County, Florida	
Sample No.	**Location and Description**
	Bridge 130083 – Underside
1,2,3	Concrete Structure – Deck, Beams, Pilings and Abutments
4,5,6	Black Mastic at Joints – Embankments
	Bridge Pair 130080 & 130081 – Underside
7,8,9	Concrete Structure – Deck, Beams, Pilings and Abutments
10,11,12	Black Mastic at Joints – Embankments
	Bridge 130083
13,14,15	Concrete with Category 5 Coating – Roadway Barriers
16,17,18	Asphalt – Roadway Deck
19,20,21	Yellow Lane Paint – Roadway Deck

Non-ACM ***Bridges Nos. 130080, 130081 & 130083*** US 301 Bradenton, Manatee County, Florida	
Sample No.	**Location and Description**
	Bridge 130083
22,23,24	White Lane Paint – Roadway Deck
25,26,27	Reflector Mastic – Roadway Deck
28,29,30	Expansion Joint – Roadway Deck
	Bridge Pair 130080 & 130081
31,32,33	Concrete with Category 5 Coating – Roadway Barriers
34,35,36	Asphalt – Bridge Approaches, Roadway
37,38,39	Concrete – Roadway Deck
40,41,42	Expansion Joint – Roadway Deck
43,44,45	Yellow Lane Paint – Roadway Deck
46,47.48	White Lane Paint – Roadway Deck
49,50,51	Reflector Mastic – Roadway Deck

6.0 ASBESTOS-CONTAINING MATERIALS

Based on our survey and sampling, there were no materials found to be asbestos-containing by Arrowhead Technologies.

7.0 CONCLUSIONS AND RECOMMENDATIONS

1. Maintain a copy of this report on-site during all renovation/demolition activities.

2. Due to no asbestos being detected, a ten (10) day notification is not required for renovations; however, if demolition activities are performed, a 10-day notification is required. (A demolition is defined by regulatory standards as any building activity that involves the removal or alteration of load-bearing structures). In accordance with federal regulations, the notice must be sent to:

Southwest District
13051 N Telecom Parkway
Suite 101
Temple Terrace, FL 33637-0926
Asbestos Contact:
Shannon Lenhart
(Ph) 813-470-5939 I (E) Shannon.Lenhart@FloridaDEP.gov

APPENDIX A

PLM LABORATORY RESULTS

ARROWHEAD TECHNOLOGIES, LLC
3151 San Bernadino St.
Clearwater, Florida 33759
813-679-0720 / mhall005@tampabay.rr.com

PLM REPORT SUMMARY

NVLAP Lab Code 200703-0

Client :	DMC	Lab Set No. :	010265
Project :	US 301 Bradenton Bridges	AT Job No. :	22-10265
Client Project No.:	22-043	Report Date :	5/18/2022
Identification :	Asbestos, Bulk Sample Analysis	Sample Date :	5/12/2022
Test Method :	Polarized Light Microscopy / Dispersion Staining (PLM/DS) EPA Method 600/R-93/116 / EPA Method 600/M4-82-020		

On 5/16/2022, fifty-one (51) bulk material samples were submitted by Mike Bradshaw for asbestos analysis by PLM/DS.
Copies of Bulk Sample Analysis sheets are attached; additional information may be found therein. The results are summarized below:

Lab Sample No.	Sample Description / Location	Asbestos Content
010265-001	Concrete Structure HA1 Bridge 130083 Underside	None Detected-Concrete
010265-002	Concrete Structure HA1 Bridge 130083 Underside	None Detected-Concrete
010265-003	Concrete Structure HA1 Bridge 130083 Underside	None Detected-Concrete
010265-004	Black Mastic at Joints HA2 Bridge 130083 Underside	None Detected-Black Mastic
010265-005	Black Mastic at Joints HA2 Bridge 130083 Underside	None Detected-Black Mastic
010265-006	Black Mastic at Joints HA2 Bridge 130083 Underside	None Detected-Black Mastic
010265-007	Concrete Structure HA3 Bridge 130080 and 130081 Underside	None Detected-Concrete
010265-008	Concrete Structure HA3 Bridge 130080 and 130081 Underside	None Detected-Concrete

These samples were analyzed by layers. Specific layer or component asbestos content is indicated when relevant. The EPA considers a material to be asbestos containing only if it contains more than one percent asbestos by Calibrated Visual Area Estimation (CVAE). EPA regulations also indicate that Regulated Asbestos Containing Materials (RACM) -- materials which are friable or may become friable -- be further analyzed by point counting when the results indicate less than ten percent asbestos by CVAE. Arrowhead utilizes CVAE on a routine basis and does not include point counting unless specifically requested.
The results may not be reproduced except in full.

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3151 San Bernadino St.
Clearwater, Florida 33759
813-679-0720 / mhall005@tampabay.rr.com

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NVLAP Lab Code 200703-0

Client :	DMC	Lab Set No. :	010265
Project :	US 301 Bradenton Bridges	AT Job No. :	22-10265
Client Project No.:	22-043	Report Date :	5/18/2022
Identification :	Asbestos, Bulk Sample Analysis	Sample Date :	5/12/2022
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On 5/16/2022, fifty-one (51) bulk material samples were submitted by Mike Bradshaw for asbestos analysis by PLM/DS.
Copies of Bulk Sample Analysis sheets are attached; additional information may be found therein. The results are summarized below:

Lab Sample No.	Sample Description / Location	Asbestos Content
010265-009	Concrete Structure HA3 Bridge 130080 and 130081 Underside	None Detected-Concrete
010265-010	Black Mastic at Joints HA4 Bridge 130080 and 130081 Underside	None Detected-Black Mastic
010265-011	Black Mastic at Joints HA4 Bridge 130080 and 130081 Underside	None Detected-Black Mastic
010265-012	Black Mastic at Joints HA4 Bridge 130080 and 130081 Underside	None Detected-Black Mastic
010265-013	Concrete and Cat 5 Coating HA5 Bridge 130083	None Detected-White Cat 5 Coating None Detected-Concrete
010265-014	Concrete and Cat 5 Coating HA5 Bridge 130083	None Detected-White Cat 5 Coating None Detected-Concrete
010265-015	Concrete and Cat 5 Coating HA5 Bridge 130083	None Detected-White Cat 5 Coating None Detected-Concrete
010265-016	Asphalt HA6 Bridge 130083	None Detected-Black Asphalt

These samples were analyzed by layers. Specific layer or component asbestos content is indicated when relevant. The EPA considers a material to be asbestos containing only if it contains more than one percent asbestos by Calibrated Visual Area Estimation (CVAE). EPA regulations also indicate that Regulated Asbestos Containing Materials (RACM) -- materials which are friable or may become friable -- be further analyzed by point counting when the results indicate less than ten percent asbestos by CVAE. Arrowhead utilizes CVAE on a routine basis and does not include point counting unless specifically requested.
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Client Project No.:	22-043	Report Date :	5/18/2022
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On 5/16/2022, fifty-one (51) bulk material samples were submitted by Mike Bradshaw for asbestos analysis by PLM/DS.
Copies of Bulk Sample Analysis sheets are attached; additional information may be found therein. The results are summarized below:

Lab Sample No.	Sample Description / Location	Asbestos Content
010265-017	Asphalt HA6 Bridge 130083	None Detected-Black Asphalt
010265-018	Asphalt HA6 Bridge 130083	None Detected-Black Asphalt
010265-019	Yellow Lane Paint HA7 Bridge 130083	None Detected-Yellow Lane Paint
010265-020	Yellow Lane Paint HA7 Bridge 130083	None Detected-Yellow Lane Paint
010265-021	Yellow Lane Paint HA7 Bridge 130083	None Detected-Yellow Lane Paint
010265-022	White Lane Paint HA8 Bridge 130083	None Detected-White Lane Paint
010265-023	White Lane Paint HA8 Bridge 130083	None Detected-White Lane Paint
010265-024	White Lane Paint HA8 Bridge 130083	None Detected-White Lane Paint

These samples were analyzed by layers. Specific layer or component asbestos content is indicated when relevant. The EPA considers a material to be asbestos containing only if it contains more than one percent asbestos by Calibrated Visual Area Estimation (CVAE). EPA regulations also indicate that Regulated Asbestos Containing Materials (RACM) -- materials which are friable or may become friable -- be further analyzed by point counting when the results indicate less than ten percent asbestos by CVAE. Arrowhead utilizes CVAE on a routine basis and does not include point counting unless specifically requested.
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Identification :	Asbestos, Bulk Sample Analysis	Sample Date :	5/12/2022
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On 5/16/2022, fifty-one (51) bulk material samples were submitted by Mike Bradshaw for asbestos analysis by PLM/DS.
Copies of Bulk Sample Analysis sheets are attached; additional information may be found therein. The results are summarized below:

Lab Sample No.	Sample Description / Location	Asbestos Content
010265-025	Reflector Mastic HA9 Bridge 130083	None Detected-Black Mastic
010265-026	Reflector Mastic HA9 Bridge 130083	None Detected-Black Mastic
010265-027	Reflector Mastic HA9 Bridge 130083	None Detected-Black Mastic
010265-028	Expansion Joint HA10 Bridge 130083	None Detected-Gray Expansion Joint
010265-029	Expansion Joint HA10 Bridge 130083	None Detected-Gray Expansion Joint
010265-030	Expansion Joint HA10 Bridge 130083	None Detected-Gray Expansion Joint
010265-031	Concrete and Cat 5 Coating HA11 Bridges 130080 and 130081	None Detected-White Cat 5 Coating None Detected-Concrete
010265-032	Concrete and Cat 5 Coating HA11 Bridges 130080 and 130081	None Detected-White Cat 5 Coating None Detected-Concrete

These samples were analyzed by layers. Specific layer or component asbestos content is indicated when relevant. The EPA considers a material to be asbestos containing only if it contains more than one percent asbestos by Calibrated Visual Area Estimation (CVAE). EPA regulations also indicate that Regulated Asbestos Containing Materials (RACM) -- materials which are friable or may become friable -- be further analyzed by point counting when the results indicate less than ten percent asbestos by CVAE. Arrowhead utilizes CVAE on a routine basis and does not include point counting unless specifically requested.
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Identification :	Asbestos, Bulk Sample Analysis	Sample Date :	5/12/2022
Test Method :	Polarized Light Microscopy / Dispersion Staining (PLM/DS) EPA Method 600/R-93/116 / EPA Method 600/M4-82-020		

On 5/16/2022, fifty-one (51) bulk material samples were submitted by Mike Bradshaw for asbestos analysis by PLM/DS.
Copies of Bulk Sample Analysis sheets are attached; additional information may be found therein. The results are summarized below:

Lab Sample No.	Sample Description / Location	Asbestos Content
010265-033	Concrete and Cat 5 Coating HA11 Bridges 130080 and 130081	None Detected-White Cat 5 Coating None Detected-Concrete
010265-034	Asphalt HA12 Bridges 130080 and 130081	None Detected-Black Asphalt
010265-035	Asphalt HA12 Bridges 130080 and 130081	None Detected-Black Asphalt
010265-036	Asphalt HA12 Bridges 130080 and 130081	None Detected-Black Asphalt
010265-037	Concrete Deck HA13 Bridges 130080 and 130081	None Detected-Concrete
010265-038	Concrete Deck HA13 Bridges 130080 and 130081	None Detected-Concrete
010265-039	Concrete Deck HA13 Bridges 130080 and 130081	None Detected-Concrete
010265-040	Expansion Joint HA14 Bridges 130080 and 130081	None Detected-Gray Expansion Joint

These samples were analyzed by layers. Specific layer or component asbestos content is indicated when relevant. The EPA considers a material to be asbestos containing only if it contains more than one percent asbestos by Calibrated Visual Area Estimation (CVAE). EPA regulations also indicate that Regulated Asbestos Containing Materials (RACM) -- materials which are friable or may become friable -- be further analyzed by point counting when the results indicate less than ten percent asbestos by CVAE. Arrowhead utilizes CVAE on a routine basis and does not include point counting unless specifically requested.
The results may not be reproduced except in full.

ARROWHEAD TECHNOLOGIES, LLC
3151 San Bernadino St.
Clearwater, Florida 33759
813-679-0720 / mhall005@tampabay.rr.com

PLM REPORT SUMMARY

NVLAP Lab Code 200703-0

Client :	DMC	Lab Set No. :	010265
Project :	US 301 Bradenton Bridges	AT Job No. :	22-10265
Client Project No.:	22-043	Report Date :	5/18/2022
Identification :	Asbestos, Bulk Sample Analysis	Sample Date :	5/12/2022
Test Method :	Polarized Light Microscopy / Dispersion Staining (PLM/DS) EPA Method 600/R-93/116 / EPA Method 600/M4-82-020		

On 5/16/2022, fifty-one (51) bulk material samples were submitted by Mike Bradshaw for asbestos analysis by PLM/DS.
Copies of Bulk Sample Analysis sheets are attached; additional information may be found therein. The results are summarized below:

Lab Sample No.	Sample Description / Location	Asbestos Content
010265-041	Expansion Joint HA14 Bridges 130080 and 130081	None Detected-Gray Expansion Joint
010265-042	Expansion Joint HA14 Bridges 130080 and 130081	None Detected-Gray Expansion Joint
010265-043	Yellow Lane Paint HA15 Bridges 130080 and 130081	None Detected-Yellow Lane Paint
010265-044	Yellow Lane Paint HA15 Bridges 130080 and 130081	None Detected-Yellow Lane Paint
010265-045	Yellow Lane Paint HA15 Bridges 130080 and 130081	None Detected-Yellow Lane Paint
010265-046	White Lane Paint HA16 Bridges 130080 and 130081	None Detected-White Lane Paint
010265-047	White Lane Paint HA16 Bridges 130080 and 130081	None Detected-White Lane Paint
010265-048	White Lane Paint HA16 Bridges 130080 and 130081	None Detected-White Lane Paint

These samples were analyzed by layers. Specific layer or component asbestos content is indicated when relevant. The EPA considers a material to be asbestos containing only if it contains more than one percent asbestos by Calibrated Visual Area Estimation (CVAE). EPA regulations also indicate that Regulated Asbestos Containing Materials (RACM) -- materials which are friable or may become friable -- be further analyzed by point counting when the results indicate less than ten percent asbestos by CVAE. Arrowhead utilizes CVAE on a routine basis and does not include point counting unless specifically requested.
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PLM REPORT SUMMARY

NVLAP Lab Code 200703-0

Client :	DMC	Lab Set No. :	010265
Project :	US 301 Bradenton Bridges	AT Job No. :	22-10265
Client Project No.:	22-043	Report Date :	5/18/2022
Identification :	Asbestos, Bulk Sample Analysis	Sample Date :	5/12/2022
Test Method :	Polarized Light Microscopy / Dispersion Staining (PLM/DS) EPA Method 600/R-93/116 / EPA Method 600/M4-82-020		

On 5/16/2022, fifty-one (51) bulk material samples were submitted by Mike Bradshaw for asbestos analysis by PLM/DS.
Copies of Bulk Sample Analysis sheets are attached; additional information may be found therein. The results are summarized below:

Lab Sample No.	Sample Description / Location	Asbestos Content
010265-049	Reflector Mastic HA17 Bridges 130080 and 130081	None Detected-Black Mastic
010265-050	Reflector Mastic HA17 Bridges 130080 and 130081	None Detected-Black Mastic
010265-051	Reflector Mastic HA17 Bridges 130080 and 130081	None Detected-Black Mastic

These samples were analyzed by layers. Specific layer or component asbestos content is indicated when relevant. The EPA considers a material to be asbestos containing only if it contains more than one percent asbestos by Calibrated Visual Area Estimation (CVAE). EPA regulations also indicate that Regulated Asbestos Containing Materials (RACM) -- materials which are friable or may become friable -- be further analyzed by point counting when the results indicate less than ten percent asbestos by CVAE. Arrowhead utilizes CVAE on a routine basis and does not include point counting unless specifically requested.
The results may not be reproduced except in full.

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PLM REPORT SUMMARY

NVLAP Lab Code 200703-0

Client :	DMC	Lab Set No. :	010265
Project :	US 301 Bradenton Bridges	AT Job No. :	22-10265
Client Project No.:	22-043	Report Date :	5/18/2022
Identification :	Asbestos, Bulk Sample Analysis	Sample Date :	5/12/2022
Test Method :	Polarized Light Microscopy / Dispersion Staining (PLM/DS) EPA Method 600/R-93/116 / EPA Method 600/M4-82-020		

SCOPE OF THIS REPORT

These samples were obtained as a part of a building survey; this report is only intended to be used as a part of the survey report issued by the surveyor. This report explains the laboratory analysis and results. The surveyor's report explains the sampling protocol used, when the samples were obtained, the location(s) of the samples, where the materials were observed in the building, quantities of materials observed, condition of the materials and the extent of his/her survey. Sample locations and material descriptions are given by the surveyor on the chain of custody but included here (possibly abbreviated) only as a convenience for the reader.

This report may not be reproduced without written permission of Arrowhead and must be reproduced in full.

STATEMENT OF LABORATORY ACCREDITATION

The samples were analyzed in general accordance with the procedures outlined in the Method for the Determination of Asbestos in Bulk Building Materials, EPA/600/R-93/116, and the Interim Method for the Determination of Asbestos in Bulk Insulation Samples, EPA 600/M4-82-020. The results of each bulk sample relate only to the material tested and the results shall not be used to claim product endorsement by NVLAP or any agency of the U.S. Government.

Floor tile and other resinously bound materials, when analyzed by the EPA method, may yield false negative results because of limitations in separating closely bound fibers and in detecting fibers of small length and diameter. When a definitive result is required, Arrowhead recommends utilizing alternative methods of identification, including Transmission Electron Microscopy.

Specific questions concerning bulk sample results shall be directed to the Laboratory Director.

Analyst : Monte Hall, P.G.

Laboratory Director : Monte Hall, P.G.
Florida Registration No. 1658

Approved Signatory :



10265

P.O. Box 270010
Tampa, FL 33688
813.265.0181
ZA0000-231

CLIENT: NorthStar
PROJECT: Compr. NESHAP asbestos survey of 3 bridges (#130080, 130081 & 130083)
LOCATION: US 301 in Bradenton, Manatee County, Florida

DATE: 5/12/2022
PROJECT #: DMC22-043
PAGE: 1 OF 5
SURVEYOR: J.Michael Bradshaw

SAMPLE NO.	CODE	HOMO. AREA	GENERAL LOCATION	MATERIAL SAMPLED	QUANTITY (SQ. FT.)	FRIABLE (Y/N)	CONDITION (SD/D/G)
			130083 - BRIDGE UNDERSIDE				
1,2,3	C	1	DECK, BEAMS	CONCRETE STRUCTURE		N(1)	G
			ABUTMENTS				
4,5,6	M	2	EMBANKMENTS	BLACK MASTIC @ JOINTS		N	G

CHAIN OF CUSTODY

SAMPLES COLLECTED BY:	
Name:	MIKE BRADSHAW
Signature:	J.M.M
SAMPLES RECEIVED BY:	
Name:	Ryan Schwegman
Signature:	Ryan Schwegman

DATE:	ANALYSIS REQUESTED:
5.13.22	PLM
DATE:	DMC CONTACT:
	MB
DATE:	TURN-AROUND-TIME:
5/16/2022	STANDARD

10265

DMC
P.O. Box 270010
Tampa, FL 33688
813.265.0181
ZA0000-231

CLIENT: NorthStar
PROJECT: Compr. NESHAP asbestos survey of 3 bridges (#130080, 130081 & 130083)
LOCATION: US 301 in Bradenton, Manatee County, Florida

DATE: 5/12/2022
PROJECT #: DMC22-043
PAGE: 2 OF 5
SURVEYOR: J.Michael Bradshaw

SAMPLE NO.	CODE	HOMO. AREA	GENERAL LOCATION	MATERIAL SAMPLED	QUANTITY (SQ. FT.)	FRIABLE (Y/N)	CONDITION (SD/D/G)
			130080 & 130081				
			- BRIDGE UNDERSIDE				
7,8,9	C	3	DECK, BEAMS, PILINGS	CONCRETE STRUCTURE		N(1)	G
			& ABUTMENTS				
10,11,12	M	4	EMBANKMENTS	BLACK MASTIC		N	G
				@ JOINTS			

CHAIN OF CUSTODY

SAMPLES COLLECTED BY:	DATE:	ANALYSIS REQUESTED:
Name:	5.13.22	PLM
Signature: J.M.B	DATE:	DMC CONTACT:
SAMPLES RECEIVED BY:		MB
Name:	DATE:	TURN-AROUND-TIME:
Signature: Ryan Schuyler	5/16/2022	STANDARD

10265

DMC
P.O. Box 270010
Tampa, FL 33688
813.265.0181
ZA0000-231

CLIENT: NorthStar
PROJECT: Compr. NESHAP asbestos survey of 3 bridges (#130080, 130081 & 130083)
LOCATION: US 301 in Bradenton, Manatee County, Florida

DATE: 5/12/2022
PROJECT #: DMC22-043
PAGE: 3 OF 5
SURVEYOR: J.Michael Bradshaw

SAMPLE NO.	CODE	HOMO. AREA	GENERAL LOCATION	MATERIAL SAMPLED	QUANTITY (SQ. FT.)	FRIABLE (Y/N)	CONDITION (SD/D/G)
			130083				
13,14,15	CB/CS	5	ROADWAY BARRIERS	CONCRETE & CAT, I COATING		N(L)	G
16,17,18	A	6	ROADWAY DECK	ASPHALT		N(L)	G
19,20,21	YLP	7	" "	YELLOW LANE PAINT		N(L)	G
22,23,24	WLP	8	" "	WHITE LANE PAINT		N(L)	G
25,26,27	RM	9	" "	REFLECTOR MASTIC		N	G
28,29,30	EJ	10	" "	EXPANSION JOINT		N	G

CHAIN OF CUSTODY

SAMPLES COLLECTED BY:	
Name:	
Signature:	
SAMPLES RECEIVED BY:	
Name:	
Signature:	Ryan Schuyler

DATE:	ANALYSIS REQUESTED:
5.13.22	PLM
DATE:	DMC CONTACT:
	MB
DATE:	TURN-AROUND-TIME:
5/16/2022	STANDARD

10265

P.O. Box 270010
Tampa, FL 33688
813.265.0181
ZA0000-231

CLIENT: NorthStar
PROJECT: Compr. NESHAP asbestos survey of 3 bridges (#130080, 130081 & 130083)
LOCATION: US 301 in Bradenton, Manatee County, Florida

DATE: 5/12/2022
PROJECT #: DMC22-043
PAGE: 4 OF 5
SURVEYOR: J.Michael Bradshaw

SAMPLE NO.	CODE	HOMO. AREA	GENERAL LOCATION	MATERIAL SAMPLED	QUANTITY (SQ. FT.)	FRIABLE (Y/N)	CONDITION (SD/D/G)
			BRIDGE PAIR 130080 & 130081				
31,32,33	CB/CS	11	ROADWAY ~~BARRIERS~~	CONCRETE & CAT II COATING		N	G
34,~~35~~,~~36~~	A	12	BRIDGE APPROACHES - ROADWAY	ASPHALT		N	G
37,38,39	CD	13	ROADWAY - BRIDGE DECK	CONCRETE DECK		N(11)	G

CHAIN OF CUSTODY

SAMPLES COLLECTED BY:	DATE:	ANALYSIS REQUESTED:
Name:	5.13.22	PLM
Signature: J.M.M	DATE:	DMC CONTACT:
SAMPLES RECEIVED BY:		MB
Name:	DATE:	TURN-AROUND-TIME:
Signature: Ryan Schuyn	5/16/2022	STANDARD

10265

DMC
P.O. Box 270010
Tampa, FL 33688
813.265.0181
ZA0000-231

CLIENT: NorthStar
PROJECT: Compr. NESHAP asbestos survey of 3 bridges (#130080, 130081 & 130083)
LOCATION: US 301 in Bradenton, Manatee County, Florida

DATE: 5 / 12 /2022
PROJECT #: DMC22-043
PAGE: 5 OF 5
SURVEYOR: J.Michael Bradshaw

SAMPLE NO.	CODE	HOMO. AREA	GENERAL LOCATION	MATERIAL SAMPLED	QUANTITY (SQ. FT.)	FRIABLE (Y/N)	CONDITION (SD/D/G)
			BRIDGE PAIR 130080 & 130081				
40,41,42	EJ	14	ROADWAY DECK	EXPANSION JOINT		N	G
43,44,45	YLP	15	" "	YELLOW LANE PAINT		N	G
46,47,48	WLP	16	" "	WHITE LANE PAINT		N	G
49,50,51	RM	17	" "	REFLECTOR MASTIC		N	G

CHAIN OF CUSTODY

SAMPLES COLLECTED BY:	DATE:	ANALYSIS REQUESTED:
Name:	5.13.22	PLM
Signature: JMM	DATE:	DMC CONTACT:
SAMPLES RECEIVED BY:		MB
Name:	DATE:	TURN-AROUND-TIME:
Signature: Ryan Schegen	5/16/2022	STANDARD

APPENDIX B

LICENSES & CERTIFICATIONS

Ron DeSantis, Governor

Julie I. Brown, Secretary

STATE OF FLORIDA
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

ASBESTOS LICENSING UNIT

THE ASBESTOS BUSINESS ORGANIZATION HEREIN IS LICENSED UNDER THE PROVISIONS OF CHAPTER 469, FLORIDA STATUTES

DIVERSIFIED MANAGEMENT & CONSTRUCTION INC

J. MICHAEL BRADSHAW
PO BOX 270010
PO BOX 270010
TAMPA FL 33688

LICENSE NUMBER: ZA0000231

EXPIRATION DATE: NOVEMBER 30, 2023

Always verify licenses online at MyFloridaLicense.com

Do not alter this document in any form.

This is your license. It is unlawful for anyone other than the licensee to use this document.

Ron DeSantis, Governor

Halsey Beshears, Secretary

STATE OF FLORIDA
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

ASBESTOS LICENSING UNIT

THE ASBESTOS CONSULTANT - ENGINEER HEREIN IS LICENSED UNDER THE PROVISIONS OF CHAPTER 469, FLORIDA STATUTES

BRADSHAW, JOHN MICHAEL

5741 PINE STREET
MOUNT DORA FL 32757

LICENSE NUMBER: EA0000066

EXPIRATION DATE: NOVEMBER 30, 2022

Always verify licenses online at MyFloridaLicense.com

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Florida Approval FL49-0001008

Retra

CERTIFICATE of training.

John Michael Bradshaw

Has successfully completed the requisite training for Asbestos Accreditation as required by TSCA Title II.

Asbestos Building Inspector Refresher FL Course # 0006382

Online	RTS1639436757229
Course Location	**Certificate ID**
Completion Date: 13th December 2021	Expiration Date: 13th December 2022
Competion Date	**Expiration Date**

Course Administrator

Retra Training Services Post Office Box 270010 Tampa, Fl 33688 1-888-839-3315/727-938-5459 www.retratraining.com

United States Department of Commerce
National Institute of Standards and Technology

Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200703-0

Arrowhead Technologies, L.L.C.

Clearwater, FL

is accredited by the National Voluntary Laboratory Accreditation Program for specific services, listed on the Scope of Accreditation, for:

Asbestos Fiber Analysis

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).

2022-01-01 through 2022-12-31

Effective Dates

DEPARTMENT OF COMMERCE · UNITED STATES OF AMERICA

For the National Voluntary Laboratory Accreditation Program

APPENDIX C

LIMITATIONS

LIMITATIONS

The sampling and laboratory protocols used in this survey are in accordance with generally accepted industry standards in the State of Florida. These methods are inherently limited in nature, but due to the random collection of samples, they provide a high probability of determining asbestos content. Any condition discovered which deviates substantially from the data contained in this report should be reported to DMC for review.

Our findings are based on the data obtained during the survey, and interpretation of that data based on our professional experience. This report is not meant to confer that all potential asbestos-containing materials that may be present in the building have been identified. Inaccessible areas may include, but are not limited to: pipe chases, underground areas, fire-rated doors, etc. Without extensive destructive testing, complete documentation of all ACM cannot be provided.

It is recommended that if the initial survey was performed when the building was occupied, a follow-up visit to allow for more destructive sampling be conducted once the building is vacant but prior to renovation or demolition activities. If, during renovation or demolition activities, additional suspect building materials are observed that are not identified in this survey, they should be assumed positive for asbestos until further sampling and subsequent laboratory analysis proves otherwise.

The information contained in this report was prepared based upon specific parameters and regulations in force as of the date of the report. This report and its findings were prepared on behalf of and for the exclusive use of DMC and its Client. This report and the findings contained herein shall not, in whole or in part, be disseminated or conveyed to any other party or be used or relied upon by any other party without written consent from DMC or its designee(s).

APPENDIX D

QA/QC PROCEDURES & RESULTS

QUALITY ASSURANCE PROCEDURES

Data Review

The Laboratory Manager shall review all analytical results for accuracy and completeness prior to releasing them to ARROWHEAD TECHNOLOGIES, LLC project personnel or to the client. The Laboratory Manager shall also review QA re-analyses of samples for each specific project. If no discrepancies are noted, the Laboratory Manager shall sign the Statement of Accreditation (Appendix 5) which accompanies the sample results.

QA Re-analysis

The QA Manager will select 10% of the samples analyzed by each analyst. Special attention should be paid to borderline samples of floor tile, roofing, ceiling and plaster material and any other material that has a high potential of being asbestos-containing. All re-analyses will be given to the QA Manager to be checked for discrepancies as defined in the "Acceptability Standards" section of this document. If any discrepancies are noted, they will be resolved before results are sent out.

Intra-Laboratory Proficiency Testing

All laboratory analysts will participate in proficiency testing exercises using NIST-standard reference material. This test data and the data from the current NIST proficiency rounds will be used to calculate statistical controls for each analyst and will be reported in the monthly laboratory summary.

Inter-laboratory "Round-Robin"

The laboratory will attempt to participate in a "round-robin" type sample exchange program with other NVLAP laboratories. This program when implemented will consist of the periodic exchange of reference samples which will be analyzed by all analysts from each laboratory. Sample results will be collated by the originating laboratory and a report will be produced by the QA Manager and sent to each participating laboratory. For this laboratory, discrepancies will be determined in accordance with the "Acceptability Standards" section of this document. Comparisons will be made of asbestos type and percent for each sample including refractive indices.

NIST-NVLAP

The laboratory will participate in the NIST-NVLAP Proficiency Program. Proficiency testing samples will be analyzed individually by each analyst without consultation with any other analyst. Results will be turned into the QA Manager for collation. The QA Manager will select the results to be sent in for each round. Reported results will be checked by a second person before mailing or reporting to determine if any clerical errors were made while transposing the data to the report form. When the reference results come in from NIST, each analyst's results will be evaluated in accordance with the standards set forth in the NIST report.

Storage and Handling of Reference Material

Reference Material will be clearly labeled and stored in the laboratory storage area and under the supervision of the QA Manager and Laboratory Deputy. All Reference Material will be opened only under a bio-hood and only after the hood and all tools have been cleaned. Containers should be closed immediately after reference samples have been extracted.

If a sample is to be analyzed by another analyst, a representative sub-sample should be prepared in a separate clear container. The sub-sample should be clearly labeled and should not be placed back in the original reference container.

If reference materials are to be transported, they will be double-sealed and protected from crushing. Containers for transport should be clearly marked and have a chain-of-custody form attached to the container.

CONTAMINATION CONTROL

Refractive Index Liquids

Analysts will check each of the three main RI Liquids (1.55, 1.605 and 1.680) daily for contamination. This contamination check will consist of preparing 2 mounts of salt standards in the liquid to be checked. These mounts will then be carefully scanned under the PLM at 100x. If contamination is suspected the analyst should start by cleaning his tools and prep area. Then prepare a fresh set of salt and oil slides to re-check for cross contamination. A reiterative process must be followed to isolate and eliminate the source of the cross-contamination before proceeding with any analytical work. The analyst will initial the Contamination and Microscope Alignment Check form (Attachment 13) daily after the check is performed.

QC SAMPLE **010265-003**

Original Analyst : **Monte Hall, P.G.** Date : **5/17/202**

Sample Passed QC
2nd Analysis - OK

Sample Description : **Concrete Structure HA1**
Bridge 130083 Underside

Layer 1 Concrete

Stereoscopic Exam

Color	Texture	Homogeneous?	% Fibrous	% Asbestos	% of Sample
Grey	**Hard**	**YES**	**ND**	**ND**	

PLM Examination

Components	%	+/-	Morphology	Color / Pleochroism	Parallel Ref. Index	Perpendicular Ref. Index	Biref	Extinction Angle	Sign of Elongation
Aggregate	**60**		**Non-fibrous**						
Cement Binders	**40**		**Non-fibrous**				**Hi**		

Prep/treatment : **mechanical separation** Asbestos Content : **None Detected**

Comments :

Analyst : **Ryan Schwegman**
Date : **5/18/202**

Lab Set# :**010265** Lab Sample No. : **010265-003**

QC SAMPLE **010265-013**

Original Analyst : **Ryan Schwegman** Date : **5/17/202**

Sample Passed QC
2nd Analysis - OK

Sample Description : **Concrete and Cat 5 Coating HA5**
Bridge 130083

Layer 1 White Cat 5 Coating

Stereoscopic Exam

Color	Texture	Homogeneous?	% Fibrous	% Asbestos	% of Sample
White	**Rubbery**	**YES**	**ND**	**ND**	

PLM Examination

Components	%	+/-	Morphology	Color / Pleochroism	Parallel Ref. Index	Perpendicular Ref. Index	Biref	Extinction Angle	Sign of Elongation
Silicates & Binders	**100**		**small**	**Clr**			**M**		

Prep/treatment : **mechanical separation** Asbestos Content : **None Detected**

Layer 2 Concrete

Stereoscopic Exam

Color	Texture	Homogeneous?	% Fibrous	% Asbestos	% of Sample
Grey	**Hard**	**YES**	**ND**	**ND**	

PLM Examination

Components	%	+/-	Morphology	Color / Pleochroism	Parallel Ref. Index	Perpendicular Ref. Index	Biref	Extinction Angle	Sign of Elongation
Aggregate	**60**		**Non-fibrous**						
Cement Binders	**40**		**Non-fibrous**				**Hi**		

Prep/treatment : **mechanical separation** Asbestos Content : **None Detected**

Comments :

Analyst : **Ryan Schwegman**
Date : **5/18/202**

Lab Set# : **010265** Lab Sample No. : **010265-013**

QC SAMPLE **010265-023**

Original Analyst : **Ryan Schwegman** Date : **5/17/202**

Sample Passed QC
2nd Analysis - OK

Sample Description : **White Lane Paint HA8**
Bridge 130083

Layer 1 White Lane Paint

Stereoscopic Exam

Color	Texture	Homogeneous?	% Fibrous	% Asbestos	% of Sample
White	**Granular**	**NO**	**ND**	**ND**	

PLM Examination

Components	%	+/-	Morphology	Color / Pleochroism	Parallel Ref. Index	Perpendicular Ref. Index	Biref	Extinction Angle	Sign of Elongation
Glass Foam	**35**		**Closed Cells**				**0**		
Polymer & Binder	**65**		**Non-fibrous**	**white/none**			**none**		

Prep/treatment : **mechanical separation** Asbestos Content : **None Detected**

Comments :

Analyst : **Ryan Schwegman**
Date : **5/18/202**

Lab Set# :**010265** Lab Sample No. : **010265-023**

QC SAMPLE **010265-033**

Original Analyst : **Ryan Schwegman** Date : **5/17/202**

Sample Passed QC
2nd Analysis - OK

Sample Description : **Concrete and Cat 5 Coating HA11**
Bridges 130080 and 130081

Layer 1 White Cat 5 Coating

Stereoscopic Exam

Color	Texture	Homogeneous?	% Fibrous	% Asbestos	% of Sample
White	**Rubbery**	**YES**	**ND**	**ND**	

PLM Examination

Components	%	+/-	Morphology	Color / Pleochroism	Parallel Ref. Index	Perpendicular Ref. Index	Biref	Extinction Angle	Sign of Elongation
Silicates & Binders	**100**		**small**	**Clr**			**M**		

Prep/treatment : **mechanical separation**

Asbestos Content : **None Detected**

Comments :

Analyst : **Ryan Schwegman**
Date : **5/18/202**

Lab Set# :**010265**

Lab Sample No. : **010265-033**

QC SAMPLE **010265-043**

Original Analyst : **Ryan Schwegman** Date : **5/17/202**

Sample Passed QC
2nd Analysis - OK

Sample Description : **Yellow Lane Paint HA15**
Bridges 130080 and 130081

Layer 1 Yellow Lane Paint

Stereoscopic Exam

Color	Texture	Homogeneous?	% Fibrous	% Asbestos	% of Sample
Yellow	**Granular**	**NO**	**ND**	**ND**	

PLM Examination

Components	%	+/-	Morphology	Color / Pleochroism	Parallel Ref. Index	Perpendicular Ref. Index	Biref	Extinction Angle	Sign of Elongation
Glass Foam	**35**		**Closed Cells**				**0**		
Polymer & Binder	**65**		**Non-fibrous**	**white/none**			**none**		

Prep/treatment : **mechanical separation** Asbestos Content : **None Detected**

Comments :

Analyst : **Ryan Schwegman**
Date : **5/18/202**

Lab Set# :**010265** Lab Sample No. : **010265-043**

Advanced Environmental Laboratories, Inc
9610 Princess Palm Ave Tampa, FL 33619
Payments: P.O. Box 551580 Jacksonville, FL 32255-1580
Phone: (813) 630-9616
Fax: (813) 630-4327

FINAL

Workorder: US 301 from South (T2209716)

June 06, 2022

Greg Garrison
NorthStar Contracting Group
2760 S. Falkenburg Rd
Tampa, FL 33619

RE: Workorder: T2209716 US 301 from South

Dear Greg Garrison:

Enclosed are the analytical results for sample(s) received by the laboratory on Friday May 13, 2022. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report. The analytical results for the samples contained in this report were submitted for analysis as outlined by the Chain of Custody and results pertain only to these samples.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Sheila Wilcox, Assistant Lab Manager
SWilcox@aellab.com

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FINAL

Workorder: US 301 from South (T2209716)

Sample Summary

Lab ID	Sample ID	Matrix	Method	Date Collected	Date Received	Analytes Reported	Basis
T2209716001	PS-1	SO	SM 2540G	05/12/2022 20:10	05/13/2022 12:25	1	Dry
T2209716001	PS-1	SO	SW-846 6010	05/12/2022 20:10	05/13/2022 12:25	5	Dry
T2209716002	PS-2	SO	SM 2540G	05/12/2022 20:15	05/13/2022 12:25	1	Dry
T2209716002	PS-2	SO	SW-846 6010	05/12/2022 20:15	05/13/2022 12:25	5	Dry
T2209716003	PS-3	SO	SM 2540G	05/12/2022 20:20	05/13/2022 12:25	1	Dry
T2209716003	PS-3	SO	SW-846 6010	05/12/2022 20:20	05/13/2022 12:25	5	Dry
T2209716004	Comp 1	SO	SM 2540G	05/12/2022 20:10	05/13/2022 12:25	1	Dry
T2209716004	Comp 1	SO	SW-846 6010	05/12/2022 20:10	05/13/2022 12:25	4	Dry
T2209716005	PS-4	SO	SM 2540G	05/12/2022 22:00	05/13/2022 12:25	1	Dry
T2209716005	PS-4	SO	SW-846 6010	05/12/2022 22:00	05/13/2022 12:25	5	Dry
T2209716006	PS-5	SO	SM 2540G	05/12/2022 22:05	05/13/2022 12:25	1	Dry
T2209716006	PS-5	SO	SW-846 6010	05/12/2022 22:05	05/13/2022 12:25	5	Dry
T2209716007	PS-6	SO	SM 2540G	05/12/2022 22:10	05/13/2022 12:25	1	Dry
T2209716007	PS-6	SO	SW-846 6010	05/12/2022 22:10	05/13/2022 12:25	5	Dry
T2209716008	PS-7	SO	SM 2540G	05/12/2022 22:15	05/13/2022 12:25	1	Dry
T2209716008	PS-7	SO	SW-846 6010	05/12/2022 22:15	05/13/2022 12:25	5	Dry
T2209716009	Comp 2	SO	SM 2540G	05/12/2022 22:00	05/13/2022 12:25	1	Dry
T2209716009	Comp 2	SO	SW-846 6010	05/12/2022 22:00	05/13/2022 12:25	4	Dry
T2209716010	PS-8	SO	SM 2540G	05/12/2022 23:40	05/13/2022 12:25	1	Dry
T2209716010	PS-8	SO	SW-846 6010	05/12/2022 23:40	05/13/2022 12:25	6	Dry
T2209716011	PS-9	SO	SM 2540G	05/12/2022 23:45	05/13/2022 12:25	1	Dry
T2209716011	PS-9	SO	SW-846 6010	05/12/2022 23:45	05/13/2022 12:25	5	Dry
T2209716012	PS-10	SO	SM 2540G	05/12/2022 23:50	05/13/2022 12:25	1	Dry
T2209716012	PS-10	SO	SW-846 6010	05/12/2022 23:50	05/13/2022 12:25	5	Dry
T2209716013	Comp 3	SO	SM 2540G	05/12/2022 23:40	05/13/2022 12:25	1	Dry
T2209716013	Comp 3	SO	SW-846 6010	05/12/2022 23:40	05/13/2022 12:25	4	Dry

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Workorder: US 301 from South (T2209716)

Analytical Results Qualifiers

Parameter Qualifiers

U	The compound was analyzed for but not detected.
I	The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
Q	Missed Hold Time

Lab Qualifiers

T	DOH Certification #E84589 (FL NELAC) AEL-Tampa

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716001 **Date Collected:** 05/12/2022 20:10 **Matrix:** Soil
Sample ID: PS-1 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS (SW-846 3050B/SW-846 6010)								
Arsenic	0.12 U	mg/Kg	0.25	0.12	1	05/18/2022 11:30	05/18/2022 18:39	T
Cadmium	0.025 U	mg/Kg	0.049	0.025	1	05/18/2022 11:30	05/18/2022 18:39	T
Chromium	0.20 U	mg/Kg	0.25	0.20	1	05/18/2022 11:30	05/18/2022 18:39	T
Lead	**0.47**	mg/Kg	0.25	0.12	1	05/18/2022 11:30	05/18/2022 18:39	T
Zinc	**2.3 I**	mg/Kg	2.5	1.2	1	05/18/2022 11:30	05/18/2022 18:39	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716002 **Date Collected:** 05/12/2022 20:15 **Matrix:** Soil
Sample ID: PS-2 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS (SW-846 3050B/SW-846 6010)								
Arsenic	0.12 U	mg/Kg	0.24	0.12	1	05/18/2022 11:30	05/18/2022 18:42	T
Cadmium	0.024 U	mg/Kg	0.048	0.024	1	05/18/2022 11:30	05/18/2022 18:42	T
Chromium	0.19 U	mg/Kg	0.24	0.19	1	05/18/2022 11:30	05/18/2022 18:42	T
Lead	**0.21 I**	mg/Kg	0.24	0.12	1	05/18/2022 11:30	05/18/2022 18:42	T
Zinc	**1.8 I**	mg/Kg	2.4	1.2	1	05/18/2022 11:30	05/18/2022 18:42	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716003 **Date Collected:** 05/12/2022 20:20 **Matrix:** Soil
Sample ID: PS-3 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS (SW-846 3050B/SW-846 6010)								
Arsenic	**0.66**	mg/Kg	0.25	0.12	1	05/18/2022 11:30	05/18/2022 18:45	T
Cadmium	**0.14**	mg/Kg	0.050	0.025	1	05/18/2022 11:30	05/18/2022 18:45	T
Chromium	**6.3**	mg/Kg	0.25	0.20	1	05/18/2022 11:30	05/18/2022 18:45	T
Lead	**11**	mg/Kg	0.25	0.12	1	05/18/2022 11:30	05/18/2022 18:45	T
Zinc	**85**	mg/Kg	2.5	1.2	1	05/18/2022 11:30	05/18/2022 18:45	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716004 **Date Collected:** 05/12/2022 20:10 **Matrix:** Soil
Sample ID: Comp 1 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS, TCLP (SW-846 3010A/SW-846 6010)								
Arsenic	0.080 U	mg/L	0.10	0.080	1	05/25/2022 12:30	05/26/2022 14:14	T
Cadmium	0.010 U	mg/L	0.020	0.010	1	05/25/2022 12:30	05/26/2022 14:14	T
Chromium	0.050 U	mg/L	0.10	0.050	1	05/25/2022 12:30	05/26/2022 14:14	T
Lead	0.030 U	mg/L	0.10	0.030	1	05/25/2022 12:30	05/26/2022 14:14	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716005 **Date Collected:** 05/12/2022 22:00 **Matrix:** Soil
Sample ID: PS-4 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS (SW-846 3050B/SW-846 6010)								
Arsenic	0.12 U	mg/Kg	0.25	0.12	1	05/18/2022 11:30	05/18/2022 18:47	T
Cadmium	**0.36**	mg/Kg	0.049	0.025	1	05/18/2022 11:30	05/18/2022 18:47	T
Chromium	**1200**	mg/Kg	0.25	0.20	1	05/18/2022 11:30	05/18/2022 18:47	T
Lead	**4900**	mg/Kg	2.5	1.2	10	05/18/2022 11:30	05/19/2022 13:33	T
Zinc	**27**	mg/Kg	2.5	1.2	1	05/18/2022 11:30	05/18/2022 18:47	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716006 **Date Collected:** 05/12/2022 22:05 **Matrix:** Soil
Sample ID: PS-5 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS (SW-846 3050B/SW-846 6010)								
Arsenic	0.13 U	mg/Kg	0.25	0.13	1	05/18/2022 11:30	05/18/2022 18:56	T
Cadmium	0.025 U	mg/Kg	0.051	0.025	1	05/18/2022 11:30	05/18/2022 18:56	T
Chromium	**0.25**	mg/Kg	0.25	0.20	1	05/18/2022 11:30	05/18/2022 18:56	T
Lead	**0.48**	mg/Kg	0.25	0.13	1	05/18/2022 11:30	05/18/2022 18:56	T
Zinc	**4.2**	mg/Kg	2.5	1.3	1	05/18/2022 11:30	05/18/2022 18:56	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716007 **Date Collected:** 05/12/2022 22:10 **Matrix:** Soil
Sample ID: PS-6 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS (SW-846 3050B/SW-846 6010)								
Arsenic	0.13 U	mg/Kg	0.25	0.13	1	05/18/2022 11:30	05/18/2022 18:59	T
Cadmium	**0.033 I**	mg/Kg	0.051	0.025	1	05/18/2022 11:30	05/18/2022 18:59	T
Chromium	**0.81**	mg/Kg	0.25	0.20	1	05/18/2022 11:30	05/18/2022 18:59	T
Lead	**3.3**	mg/Kg	0.25	0.13	1	05/18/2022 11:30	05/18/2022 18:59	T
Zinc	**10**	mg/Kg	2.5	1.3	1	05/18/2022 11:30	05/18/2022 18:59	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716008 **Date Collected:** 05/12/2022 22:15 **Matrix:** Soil
Sample ID: PS-7 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS (SW-846 3050B/SW-846 6010)								
Arsenic	**0.22 I**	mg/Kg	0.25	0.13	1	05/18/2022 11:30	05/18/2022 19:02	T
Cadmium	**0.22**	mg/Kg	0.051	0.025	1	05/18/2022 11:30	05/18/2022 19:02	T
Chromium	**6.1**	mg/Kg	0.25	0.20	1	05/18/2022 11:30	05/18/2022 19:02	T
Lead	**12**	mg/Kg	0.25	0.13	1	05/18/2022 11:30	05/18/2022 19:02	T
Zinc	**81**	mg/Kg	2.5	1.3	1	05/18/2022 11:30	05/18/2022 19:02	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716009 **Date Collected:** 05/12/2022 22:00 **Matrix:** Soil
Sample ID: Comp 2 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS, TCLP (SW-846 3010A/SW-846 6010)								
Arsenic	0.080 U	mg/L	0.10	0.080	1	05/25/2022 12:30	05/26/2022 14:17	T
Cadmium	0.010 U	mg/L	0.020	0.010	1	05/25/2022 12:30	05/26/2022 14:17	T
Chromium	**0.29**	mg/L	0.10	0.050	1	05/25/2022 12:30	05/26/2022 14:17	T
Lead	**2.2**	mg/L	0.10	0.030	1	05/25/2022 12:30	05/26/2022 14:17	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716010 **Date Collected:** 05/12/2022 23:40 **Matrix:** Soil
Sample ID: PS-8 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS (SW-846 3050B/SW-846 6010)								
Arsenic	0.12 U	mg/Kg	0.25	0.12	1	05/18/2022 11:30	05/18/2022 19:05	T
Cadmium	**0.18**	mg/Kg	0.050	0.025	1	05/18/2022 11:30	05/18/2022 19:05	T
Chromium	**2100**	mg/Kg	2.5	2.0	10	05/18/2022 11:30	05/19/2022 13:41	T
Lead	**7800**	mg/Kg	2.5	1.2	10	05/18/2022 11:30	05/19/2022 13:41	T
Zinc	**37**	mg/Kg	2.5	1.2	1	05/18/2022 11:30	05/18/2022 19:05	T
METALS, TCLP (SW-846 3010A/SW-846 6010)								
Lead	**4.1**	mg/L	0.10	0.030	1	06/02/2022 09:00	06/02/2022 21:22	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

Analysis Results Comments

Lead

Q|Missed Hold Time

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716011 **Date Collected:** 05/12/2022 23:45 **Matrix:** Soil
Sample ID: PS-9 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS (SW-846 3050B/SW-846 6010)								
Arsenic	0.13 U	mg/Kg	0.26	0.13	1	05/18/2022 11:30	05/18/2022 19:07	T
Cadmium	**0.35**	mg/Kg	0.052	0.026	1	05/18/2022 11:30	05/18/2022 19:07	T
Chromium	**4.0**	mg/Kg	0.26	0.21	1	05/18/2022 11:30	05/18/2022 19:07	T
Lead	**17**	mg/Kg	0.26	0.13	1	05/18/2022 11:30	05/18/2022 19:07	T
Zinc	**96**	mg/Kg	2.6	1.3	1	05/18/2022 11:30	05/18/2022 19:07	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716012 **Date Collected:** 05/12/2022 23:50 **Matrix:** Soil
Sample ID: PS-10 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS (SW-846 3050B/SW-846 6010)								
Arsenic	**0.21 I**	mg/Kg	0.26	0.13	1	05/18/2022 11:30	05/18/2022 19:10	T
Cadmium	**0.16**	mg/Kg	0.052	0.026	1	05/18/2022 11:30	05/18/2022 19:10	T
Chromium	**5.1**	mg/Kg	0.26	0.21	1	05/18/2022 11:30	05/18/2022 19:10	T
Lead	**4.6**	mg/Kg	0.26	0.13	1	05/18/2022 11:30	05/18/2022 19:10	T
Zinc	**26**	mg/Kg	2.6	1.3	1	05/18/2022 11:30	05/18/2022 19:10	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/18/2022 13:40	05/18/2022 13:40	T

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Workorder: US 301 from South (T2209716)

Analytical Results

Lab ID: T2209716013 **Date Collected:** 05/12/2022 23:40 **Matrix:** Soil
Sample ID: Comp 3 **Date Received:** 05/13/2022 12:25

Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
METALS, TCLP (SW-846 3010A/SW-846 6010)								
Arsenic	0.080 U	mg/L	0.10	0.080	1	05/25/2022 12:30	05/26/2022 14:20	T
Cadmium	0.010 U	mg/L	0.020	0.010	1	05/25/2022 12:30	05/26/2022 14:20	T
Chromium	**0.25**	mg/L	0.10	0.050	1	05/25/2022 12:30	05/26/2022 14:20	T
Lead	**1.3**	mg/L	0.10	0.030	1	05/25/2022 12:30	05/26/2022 14:20	T
(SM 2540G)								
Percent Moisture	0.0010 U	%	0.001	0.0010	1	05/19/2022 15:15	05/19/2022 15:15	T

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Workorder: US 301 from South (T2209716)

QC Results

QC Batch: ICPt/2713 **Analysis Method:** SW-846 6010
Preparation Method: SW-846 3050B
Associated Lab IDs: T2209716001, T2209716002, T2209716003, T2209716005, T2209716006, T2209716007, T2209716008, T2209716010, T2209716011, T2209716012

Method Blank(4318858)

Parameter	Results	Units	PQL	MDL	Lab
Arsenic	0.12 U	mg/Kg	0.25	0.12	T
Cadmium	0.025 U	mg/Kg	0.050	0.025	T
Chromium	0.20 U	mg/Kg	0.25	0.20	T
Lead	0.12 U	mg/Kg	0.25	0.12	T
Zinc	1.2 U	mg/Kg	2.5	1.2	T

Lab Control Sample (4318859)

Parameter	Units	Spiked Amount	Spike Result	Spike Recovery	Control Limits	Lab
Arsenic	mg/Kg	25	24	98	80 - 120	T
Cadmium	mg/Kg	2.50	2.5	101	80 - 120	T
Chromium	mg/Kg	25	26	103	80 - 120	T
Lead	mg/Kg	25	24	95	80 - 120	T
Zinc	mg/Kg	25	26	103	80 - 120	T

Matrix Spike (4318860); Matrix Spike Duplicate (4318861); Parent Lab Sample (G2203809003)

Parameter	Units	Spiked Amount	Spike Result	Spike Recovery	Control Limits	Dup Result	Dup Recovery	RPD	RPD Limit	Lab
Arsenic	mg/Kg	25	25	101	75 - 125	25	101	2	20	T
Cadmium	mg/Kg	2.50	2.5	102	75 - 125	2.5	103	2	20	T
Chromium	mg/Kg	25	27	107	75 - 125	27	106	3	20	T
Lead	mg/Kg	25	3500	**-540**	75 - 125	3400	**-1050**	3	20	T
Zinc	mg/Kg	25	110	**143**	75 - 125	110	**129**	4	20	T

Matrix Spike (4318860); Matrix Spike Duplicate (4318861); Parent Lab Sample (G2203809003)

Parameter	Units	Spiked Amount	Spike Result	Spike Recovery	Control Limits	Dup Result	Dup Recovery	RPD	RPD Limit	Lab
Arsenic	mg/Kg	25	25	101	75 - 125	25	101	2	20	T
Cadmium	mg/Kg	2.50	2.5	102	75 - 125	2.5	103	2	20	T
Chromium	mg/Kg	25	27	107	75 - 125	27	106	3	20	T
Lead	mg/Kg	25	3500	**-540**	75 - 125	3400	**-1050**	3	20	T
Zinc	mg/Kg	25	110	**143**	75 - 125	110	**129**	4	20	T

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Workorder: US 301 from South (T2209716)

QC Results

QC Batch: ICPt/2746
Preparation Method: SW-846 3010A
Associated Lab IDs: T2209716004, T2209716009, T2209716013
Analysis Method: SW-846 6010

Method Blank(4328024)

Parameter	Results	Units	PQL	MDL	Lab
Arsenic	0.0080 U	mg/L	0.010	0.0080	T
Cadmium	0.0010 U	mg/L	0.0020	0.0010	T
Chromium	0.0050 U	mg/L	0.010	0.0050	T
Lead	0.0030 U	mg/L	0.010	0.0030	T

Lab Control Sample (4328025)

Parameter	Units	Spiked Amount	Spike Result	Spike Recovery	Control Limits	Lab
Arsenic	mg/L	1	.93	93	80 - 120	T
Cadmium	mg/L	0.10	.1	95	80 - 120	T
Chromium	mg/L	1	.96	96	80 - 120	T
Lead	mg/L	1	.97	97	80 - 120	T

Matrix Spike (4328026); Matrix Spike Duplicate (4328027); Parent Lab Sample (T2210185001)

Parameter	Units	Spiked Amount	Spike Result	Spike Recovery	Control Limits	Dup Result	Dup Recovery	RPD	RPD Limit	Lab
Arsenic	mg/L	1	.97	97	75 - 125	.96	96	1	20	T
Cadmium	mg/L	0.10	.1	96	75 - 125	.1	96	1	20	T
Chromium	mg/L	1	.96	96	75 - 125	.95	95	1	20	T
Lead	mg/L	1	.95	95	75 - 125	.95	95	0	20	T

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FINAL

Workorder: US 301 from South (T2209716)

QC Results

QC Batch: ICPt/2770
Preparation Method: SW-846 3010A
Associated Lab IDs: T2209716010
Analysis Method: SW-846 6010

Method Blank(4336128)

Parameter	Results	Units	PQL	MDL	Lab
Lead	0.0030 U	mg/L	0.010	0.0030	T

Lab Control Sample (4336129)

Parameter	Units	Spiked Amount	Spike Result	Spike Recovery	Control Limits	Lab
Lead	mg/L	1	.96	96	80 - 120	T

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Phone: (813) 630-9616
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FINAL

Workorder: US 301 from South (T2209716)

QC Cross Reference

Lab ID	Sample ID	Prep Batch	Prep Method
ICPt/2713 - SW-846 6010			
T2209716001	PS-1	DGMt/3851	SW-846 3050B
T2209716002	PS-2	DGMt/3851	SW-846 3050B
T2209716003	PS-3	DGMt/3851	SW-846 3050B
T2209716005	PS-4	DGMt/3851	SW-846 3050B
T2209716006	PS-5	DGMt/3851	SW-846 3050B
T2209716007	PS-6	DGMt/3851	SW-846 3050B
T2209716008	PS-7	DGMt/3851	SW-846 3050B
T2209716010	PS-8	DGMt/3851	SW-846 3050B
T2209716011	PS-9	DGMt/3851	SW-846 3050B
T2209716012	PS-10	DGMt/3851	SW-846 3050B
ICPt/2746 - SW-846 6010			
T2209716004	Comp 1	DGMt/3897	SW-846 3010A
T2209716009	Comp 2	DGMt/3897	SW-846 3010A
T2209716013	Comp 3	DGMt/3897	SW-846 3010A
ICPt/2770 - SW-846 6010			
T2209716010	PS-8	DGMt/3941	SW-846 3010A
WCAt/12285 - SM 2540G			
T2209716001	PS-1		
T2209716002	PS-2		
T2209716003	PS-3		
T2209716004	Comp 1		
T2209716005	PS-4		
T2209716006	PS-5		
T2209716007	PS-6		
T2209716008	PS-7		
T2209716009	Comp 2		
T2209716010	PS-8		
T2209716011	PS-9		
T2209716012	PS-10		
WCAt/12312 - SM 2540G			
T2209716013	Comp 3		

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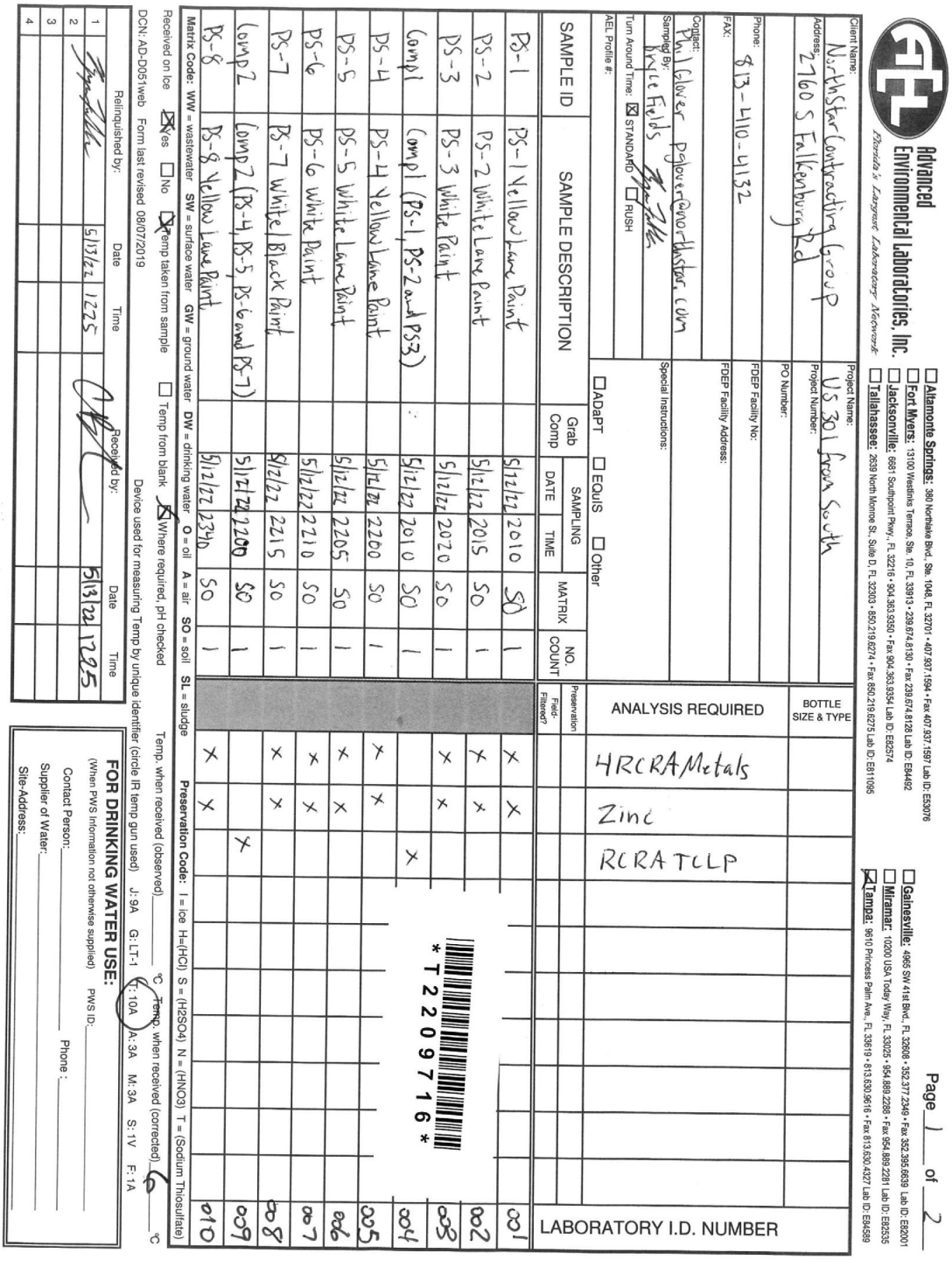
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☐ Fort Myers: 13100 Westlinks Terrace, Ste. 10, FL 33913 • 239.674.8130 • Fax 239.674.8128 Lab ID: E84492
☐ Jacksonville: 6681 Southpoint Pkwy., FL 32216 • 904.363.9350 • Fax 904.363.9354 Lab ID: E82574
☐ Tallahassee: 2639 North Monroe St., Suite D, FL 32303 • 850.219.6274 • Fax 850.219.6275 Lab ID: E811095
☐ Gainesville: 4965 SW 41st Blvd., FL 32608 • 352.377.2349 • Fax 352.395.6839 Lab ID: E82001
☐ Miramar: 10200 USA Today Way, FL 33025 • 954.889.2288 • Fax 954.889.2281 Lab ID: E82355
☑ Tampa: 9610 Princess Palm Ave., FL 33619 • 813.630.9616 • Fax 813.630.4327 Lab ID: E84589

Page 1 of 2

Client Name: Northstar Contracting Group
Address: 2760 S Falkenburg Rd
Phone: 813-410-4132
FAX:
Contact: Phil Weaver pgweaver@nstar.com
Sampled By: Bryce Fields
Turn Around Time: ☒ STANDARD ☐ RUSH
AEL Profile #:

Project Name: US 301 from South
Project Number:
PO Number:
FDEP Facility No:
FDEP Facility Address:
Special Instructions:

☐ ADaPT ☐ EQuIS ☐ Other

SAMPLE ID	SAMPLE DESCRIPTION	Grab / Comp	SAMPLING DATE	SAMPLING TIME	MATRIX	NO. COUNT	Preservation	Field-Filtered?	ANALYSIS REQUIRED	BOTTLE SIZE & TYPE	LABORATORY I.D. NUMBER
PS-1	PS-1 Yellow Lane Paint		5/12/22	2010	SO	1			4RCRAMetals		001
PS-2	PS-2 White Lane Paint		5/12/22	2015	SO	1			Zinc		002
PS-3	PS-3 White Paint		5/12/22	2020	SO	1			RCRA TCLP		003
Comp1	Comp1 (PS-1, PS-2 and PS3)		5/12/22	2010	SO	1					004
PS-4	PS-4 Yellow Lane Paint		5/12/22	2200	SO	1					005
PS-5	PS-5 White Lane Paint		5/12/22	2205	SO	1					006
PS-6	PS-6 White Paint		5/12/22	2210	SO	1					007
PS-7	PS-7 White/Black Paint		5/12/22	2215	SO	1					008
Comp2	Comp2 (PS-4, PS-5, PS-6 and PS-7)		5/12/22	2200	SO	1					009
PS-8	PS-8 Yellow Lane Paint		5/12/22	2340	SO	1					010

T2209716

Matrix Code: WW = wastewater SW = surface water GW = ground water DW = drinking water O = oil A = air SO = soil SL = sludge
Preservation Code: I = ice H=(HCl) S = (H2SO4) N = (HNO3) T = (Sodium Thiosulfate)

Received on Ice ☒ Yes ☐ No ☐ Temp taken from sample ☐ Temp from blank ☒ Where required, pH checked
Temp. when received (observed)_____ °C Temp. when received (corrected) 6 °C
DCN: AD-D051web Form last revised 08/07/2019
Device used for measuring Temp by unique identifier (circle IR temp gun used) J: 9A G: LT-1 C: 10A A: 3A M: 3A S: 1V F: 1A

	Relinquished by:	Date	Time	Received by:	Date	Time
1		5/13/22	1225		5/13/22	1225
2						
3						
4						

FOR DRINKING WATER USE:
(When PWS information not otherwise supplied) PWS ID:_____
Contact Person:_____ Phone :_____
Supplier of Water:_____
Site-Address:_____

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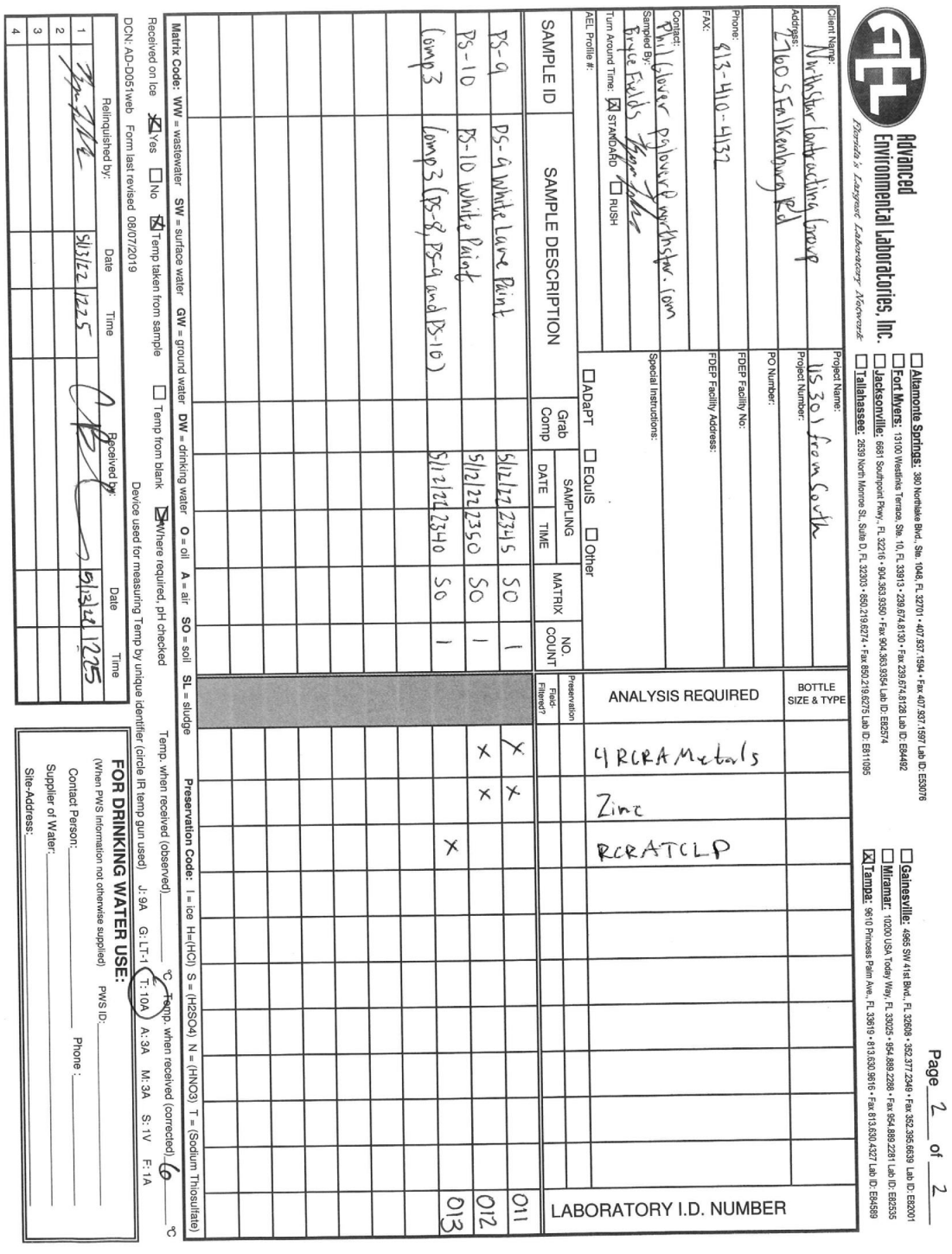
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Workorder: US 301 from South (T2209716)



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☐ Gainesville: 4955 SW 41st Blvd., FL 32608 • 352.377.2349 • Fax 352.395.6639 Lab ID: E82001
☐ Miramar: 10200 USA Today Way, FL 33025 • 954.889.2288 • Fax 954.889.2281 Lab ID: E82535
☒ Tampa: 9610 Princess Palm Ave., FL 33619 • 813.630.9616 • Fax 813.630.4327 Lab ID: E84589

Page 2 of 2

Client Name: Northstar Contracting Group
Address: 2760 S Falkenburg Rd
Phone: 813-410-4132
FAX:
Contact: Phil Glover pglover@northstar.com
Sampled By: Kyle Fields
Turn Around Time: ☒ STANDARD ☐ RUSH
AEL Profile #:

Project Name: US 301 from South
Project Number:
PO Number:
FDEP Facility No:
FDEP Facility Address:
Special Instructions:

☐ DaPT ☐ EQuIS ☐ Other

SAMPLE ID	SAMPLE DESCRIPTION	Grab / Comp	SAMPLING DATE	SAMPLING TIME	MATRIX	NO. COUNT	Preservation	Field-Filtered?	ANALYSIS REQUIRED	BOTTLE SIZE & TYPE	LABORATORY I.D. NUMBER
PS-9	PS-9 White Lane Paint		5/12/22	2345	SO	1		X	4 RCRA Metals		011
PS-10	PS-10 White Paint		5/12/22	2350	SO	1		X	Zinc		012
Comp 3	Comp 3 (PS-8, PS-9 and PS-10)		5/12/22	2340	SO	1			RCRATCLP		013

Matrix Code: WW = wastewater SW = surface water GW = ground water DW = drinking water O = oil A = air SO = soil SL = sludge
Preservation Code: I = ice H=(HCl) S = (H2SO4) N = (HNO3) T = (Sodium Thiosulfate)

Received on Ice ☒ Yes ☐ No ☒ Temp taken from sample ☐ Temp from blank ☒ Where required, pH checked
Temp. when received (observed) ____ °C Temp. when received (corrected) 6 °C
Device used for measuring Temp by unique identifier (circle IR temp gun used) J: 9A G: LT-1 T: 10A A: 3A M: 3A S: 1V F: 1A

DCN: AD-D051web Form last revised 08/07/2019

	Relinquished by:	Date	Time	Received by:	Date	Time
1		5/13/22	1225		5/13/22	1225
2						
3						
4						

FOR DRINKING WATER USE:
(When PWS information not otherwise supplied) PWS ID:
Contact Person: Phone:
Supplier of Water:
Site Address:

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Site No. 72

Bridge No. 130002

Asbestos Survey Report

Bridge No. 130002
SR 55 (US 41) over SR 43 (US 301)
Bradenton, Manatee County, Florida

Prepared for:
Florida Department of Transportation
District 1
801 North Broadway Avenue
Bartow, Florida 33830

Prepared by:
CB&I Environmental & Infrastructure, Inc.
1228 Winter Garden Vineland Road
Winter Garden, Florida 34787

FDOT Contract BDV75
FDOT FPID 435106-1-52-01, Letter of Authorization Z
CB&I Project 152477
November 2014

ASBESTOS SURVEY TITLE SHEET

Facility Name: Bridge No. 130002

Address/Location: SR 55 (US 41) over SR 43 (US 301)

City, County, State: Bradenton, Manatee County, Florida

Owner Agency: Florida Department of Transportation District 1

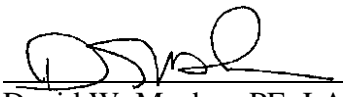
Date of Survey: July 2, 2014

Consultant: CB&I Environmental & Infrastructure, Inc. .

Consultant Address: 1228 Winter Garden Vineland Road

City, State, Zip Code: Winter Garden, Florida 34787

Telephone Number: 407-287-3210 (Shawn Flynn, PG; Contract Manager)



November 12, 2014

David W. Mosher, PE, LAC
Licensed Asbestos Consultant, EA-0000078

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DISCLAIMER

ACRONYMS AND ABBREVIATIONS

Surfacing Materials
SAS – acoustical/sprayed surfacing material
SAT – acoustical/troweled surfacing material
SFP – fireproofing/structural

Thermal Materials
TPI – pipe insulation
TPC – pipe cover
TPE – pipe elbow/joint
TPM – pipe mastic

Miscellaneous Materials
MAS – mastic/adhesive
MBB – vinyl baseboard
MBP – bearing pad
MCA – carpet adhesive
MCC – concrete
MCK – caulk/sealant
MCM – cementitious material/patch
MCT – ceiling tile
MDI – duct insulation
MDM – duct mastic
MEJ – expansion joint
MFD – fire door
MFT – floor tile
MGS – gasket
MJC – joint compound
MMB – moisture barrier (felt)
MPC – "popcorn" textured ceiling finish
MPL – plaster
MRM – reflector mastic
MRP – railing pads
MSI – sink insulation
MST – stucco
MSV – sheet vinyl/flooring
MTC – cementitious/Transite-type conduit/pipe
MTP – cementitious/Transite-type panel
MVD – vibration damper
MVP – vibration pads
MWB – wallboard
MWG – window glazing
MWP – wallpaper/covering

Roofing Materials
RBU – built-up roofing
RAS – asphalt shingle
RFT – tarpaper and felt
RRM – rolled membrane
RFM – flashing mastic
RTP – Transite-type panel/shingle

SECTION 1

SURVEY SUMMARY

ASBESTOS SURVEY OVERVIEW

As part of transportation improvement activities, the Florida Department of Transportation (FDOT) District 1 will be performing construction activities on Bridge No.130002, located on SR 55 (US 41) over SR 43 (US 301) in Bradenton, Manatee County, Florida, and has requested that an asbestos survey be performed to determine the presence, if any, of asbestos-containing materials (ACM), **FORM 1**. Survey activities described below were performed in accordance with the Asbestos Hazard Emergency Response Act (AHERA) sampling protocol and comply with the National Emission Standards for Hazardous Air Pollutants (NESHAP).

The FDOT provided CB&I Environmental & Infrastructure, Inc., (CB&I) with structure plans (T. Y. Lin International, dated April 2014) and design plans (T. Y. Lin International, dated April 2014) for the bridge. CB&I's review indicated that there was no information presented to indicate the presence of ACM.

Mr. Thomas Gregory and Mr. Daniel Roebke of CB&I performed the asbestos survey on July 2, 2014, to determine the location, extent, and condition of suspect ACM.

During the asbestos survey, random samples of the following materials were collected to determine asbestos content: concrete, joint compound, grout, mastic, Class 5 coating, and bearing pads (**FORM 2**). No drains along the bridge deck or abutments were identified during the survey.

Under the AHERA definitions and sampling protocol, 15 homogenous areas (HA) were identified during this survey as miscellaneous materials. A homogeneous area is an application of surfacing material, thermal system insulation material, or miscellaneous materials that is uniform in color, texture, and vintage of application. Miscellaneous material is defined by the United States Environmental Protection Agency (USEPA) as interior building material on structural components; structural members or fixtures such as floor tiles, adhesives and mastics; and does not include surfacing material or thermal system insulation (40 CFR Part 763.83).

Also, during the survey, the quantification and extent of each HA was estimated and the friability of the material was determined. A material is considered friable if, when dry, it can be crumbled, pulverized, or reduced to a powder by hand pressure, as defined by the USEPA. At a minimum, three samples of each HA were collected for analysis, as recommended by the USEPA (*100 Commonly Asked Questions About the New AHERA Asbestos-in-Schools Rule*, USEPA, May 1988) and required by CB&I protocol. Three additional samples were collected randomly

for quality assurance/quality control (QA/QC) purposes. The total number of samples collected from this bridge was 48 (45 from 15 HAs and 3 QA/QC samples).

Samples of suspect materials were submitted for asbestos analysis to an independent laboratory certified by the National Voluntary Laboratory Accreditation Program (NVLAP). Additionally, as per FDOT requirements, QA/QC samples were collected and submitted for analysis to a second NVLAP-certified laboratory. All samples were analyzed for asbestos of bulk materials by EPA Method 600/R-93/116 using Polarized Light Microscopy.

During the survey, the following homogeneous areas (HA[s]) were identified as ACM:

- HA 10; gray mastic in median reflectors

The gray mastic is considered to be Category I nonfriable ACM and was obserbed to be in generally good condition at the time of the survey. In accordance with Florida Statues and EPA NESHAP enforcement interpretation, these ACMs may remain during demolition provided that they remain in good condition, that "wet" demolition is performed, and the demolished materials are not recycled. If the concrete on the medial are to be recycled, we recommend that the gray mastic at the reflectors be removed by a Florida-licensed asbestos abatement contractor prior to demolition. Proper personal protective equipment (PPE) and exterior isolation techniques should also be utilized during the removal of the mastic.

Estimates related to the cost of abatement (including disposal) and the on-site air monitoring are provided for each HA that contains asbestos on **FORM 2**. These estimates are based on our previous experience for similar abatement projects in similar locations and do not include the costs for replacement materials or labor following the abatement work.

ASBESTOS SURVEY REPORT – FORM 1

BRIDGE IDENTIFICATION

County: Manatee County
Agency: Florida Department of Transportation District 1
Bridge Name: SR 55 (US 41) over SR 43 (US 301)
Bridge No.: 130002
Address and/or Geographic Location: Intersection of SR 55 and SR 43, Bradenton
Asbestos Contact Person: Jeffrey James Telephone Number: 863-519-2625
FDOT Contact: Jeffrey James Telephone Number: 863-519-2625

SURVEY IDENTIFICATION

Date of Survey: July 2, 2014 Date of Report: November 12, 2014
Contract No.: BDV75
FM No.: 435106-1-52-01, Letter of Authorization Z
Consultant's Name: David W. Mosher, PE, LAC License No.: EA-0000078 (ZA 317)
Name of Firm: CB&I Environmental & Infrastructure, Inc.
Address: 1228 Winter Garden Vineland Road, Winter Garden, Florida 34787
Telephone Number: 407-287-3210 (Shawn Flynn, PG; Contract Manager)

BRIDGE INFORMATION

Year of Construction: 1964
Renovation Dates: 2001

Bridge Documents/Drawings Available/Consulted:

Types:					
Plans	☒Yes	☐No	Location	file, 63 pages from T. Y. Lin (2014)
Specifications	☒Yes	☐No	Location	file, 17 pages from T. Y. Lin (2014)
Other	☐Yes	☒No	Location	
Asbestos Documents	☐Yes	☒No	Location	
	☐Yes	☐No	Location	
	☐Yes	☐No	Location	

STRUCTURAL DATA

Vertical Support: concrete columns Horizontal Support: concrete
Decking: concrete
Span: concrete Gaskets: NA
Bearing Pads: rubber Railings: concrete

If applicable:
Roof: NA
Floors: NA Ceilings: NA
Exterior Walls: NA Partition Walls: NA
HVAC System: ☐Yes ☒No Type:

ASBESTOS SURVEY AND ASSESSMENT – FORM 2

Building Name: Bridge No. 130002, SR 55 (US 41) over SR 43 (US 301) Contract No.: BVD75
Date of Survey: July 2, 2014 Agency: Florida Department of Transportation District 1
Consultant: CB&I Environmental & Infrastructure, Inc. FDOT Contact Person: Jeffrey James

Sample No. or Assumed	Material Description	Homo-geneous Area No.	Area Description	Quantity (Total for HA)	Friable Y/N	Asbestos Type & % or Assumed	Response Cost	Air Mon Cost	Replace Cost
1.1	BLACK MASTIC	1	ABUTMENT	1,848 LF	N	NAD	0	0	0
1.2	BLACK MASTIC	1	ABUTMENT	1,848 LF	N	NAD	0	0	0
1.3	BLACK MASTIC	1	ABUTMENT	1,848 LF	N	NAD	0	0	0
2.1	CONCRETE	2	GUARD RAIL WALLS	1,920 CF	N	NAD	0	0	0
2.2	CONCRETE	2	GUARD RAIL WALLS	1,920 CF	N	NAD	0	0	0
2.3	CONCRETE	2	GUARD RAIL WALLS	1,920 CF	N	NAD	0	0	0
3.1	BLACK FELT	3	BETWEEN COLUMNS AND GUARD WALL	80 LF	N	NAD	0	0	0
3.2	BLACK FELT	3	BETWEEN COLUMNS AND GUARD WALL	80 LF	N	NAD	0	0	0
3.3	BLACK FELT	3	BETWEEN COLUMNS AND GUARD WALL	80 LF	N	NAD	0	0	0
3.4 QA/QC	BLACK FELT	3	BETWEEN COLUMNS AND GUARD WALL	80 LF	N	NAD	0	0	0
4.1	CONCRETE	4	ABUTMENT	210 LF	N	NAD	0	0	0
4.2	CONCRETE	4	ABUTMENT	210 LF	N	NAD	0	0	0
4.3	CONRETE	4	ABUTMENT	210 LF	N	NAD	0	0	0

COMMENTS/NOTES:

Y – Yes
N – No
NA – Not Applicable
NAD – No Asbestos Detected
LF – Linear feet
SF – Square feet

CF – Cubic Feet
CAT I – Category I
CAT II – Category II
PC – Point Count Analysis
PS – Analyzed to first positive stop
Trace – Less than 1%

chry. - chrysotile
amo. - amosite
trem. - tremolite
cro. - crocidolite

1. All quantities given in square feet unless otherwise indicated.

2. All costs provided assume one mobilization.

3. Shaded and bold text indicates Asbestos-Containing Material (ACM) or assumed ACM.

Subtotals for this page	0	0	0
Consultant Fees	See Last Page of Form 2		
O & M Costs	See Last Page of Form 2		
TOTAL	See Last Page of Form 2		

ASBESTOS SURVEY AND ASSESSMENT – FORM 2

Building Name: Bridge No.130002, SR 55 (US 41) over SR 43 (US 301) Contract No.: BVD75
Date of Survey: July 2, 2014 Agency: Florida Department of Transportation District 1
Consultant: CB&I Environmental & Infrastructure, Inc. FDOT Contact Person: Jeffrey James

Sample No. or Assumed	Material Description	Homo-geneous Area No.	Area Description	Quantity (Total for HA)	Friable Y/N	Asbestos Type & % or Assumed	Response Cost	Air Mon Cost	Replace Cost
5.1	BLACK RUBBER	5	BEARING PAD	100 SF	N	NAD	0	0	0
5.2	BLACK RUBBER	5	BEARING PAD	100 SF	N	NAD	0	0	0
5.3	BLACK RUBBER	5	BEARING PAD	100 SF	N	NAD	0	0	0
6.1	GRAY GROUT	6	ABUTMENT	924 LF	N	NAD	0	0	0
6.2	GRAY GROUT	6	ABUTMENT	924 LF	N	NAD	0	0	0
6.3	GRAY GROUT	6	ABUTMENT	924 LF	N	NAD	0	0	0
7.1	CONCRETE	7	BRIDGE DECK/GIRDER	23,050 CF	N	NAD	0	0	0
7.2	CONCRETE	7	BRIDGE DECK/GIRDER	23,050 CF	N	NAD	0	0	0
7.3	CONCRETE	7	BRIDGE DECK/GIRDER	23,050 CF	N	NAD	0	0	0
8.1	BLACK RUBBER	8	EXPANSION JOINT	75 SF	N	NAD	0	0	0
8.2	BLACK RUBBER	8	EXPANSION JOINT	75 LF	N	NAD	0	0	0
8.3	BLACK RUBBER	8	EXPANSION JOINT	75 LF	N	NAD	0	0	0
8.4 QA/QC	BLACK RUBBER	9	EXPANSION JOINT	75 LF	N	NAD	0	0	0

COMMENTS/NOTES:

Y – Yes
N – No
NA – Not Applicable
NAD – No Asbestos Detected
LF – Linear feet
SF – Square feet

CF – Cubic Feet
CAT I – Category I
CAT II – Category II
PC – Point Count Analysis
PS – Analyzed to first positive stop
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Subtotals for this page	0	0	0
Consultant Fees	See Last Page of Form 2		
O & M Costs	See Last Page of Form 2		
TOTAL	See Last Page of Form 2		

ASBESTOS SURVEY AND ASSESSMENT – FORM 2

Building Name: Bridge No.130002, SR 55 (US 41) over SR 43 (US 301) Contract No.: BVD75
Date of Survey: July 2, 2014 Agency: Florida Department of Transportation District 1
Consultant: CB&I Environmental & Infrastructure, Inc. FDOT Contact Person: Jeffrey James

Sample No. or Assumed	Material Description	Homo-geneous Area No.	Area Description	Quantity (Total for HA)	Friable Y/N	Asbestos Type & % or Assumed	Response Cost	Air Mon Cost	Replace Cost
9.1	BLACK MASTIC	9	DECK REFLECTOR	5 SF	N	NAD	0	0	0
9.2	BLACK MASTIC	9	DECK REFLECTOR	5 SF	N	NAD	0	0	0
9.3	BLACK MASTIC	9	DECK REFLECTOR	5 SF	N	NAD	0	0	0
10.1	**GRAY MASTIC**	**10**	**MEDIAN REFLECTOR**	**3 SF**	**N**	**CHRY: 2%**	**2,000**	**800**	**0**
10.2	**GRAY MASTIC**	**10**	**MEDIAN REFLECTOR**	**3 SF**	**N**	**CHRY: 2%**	**0**	**0**	**0**
10.3	**GRAY MASTIC**	**10**	**MEDIAN REFLECTOR**	**3 SF**	**N**	**CHRY: 2%**	**0**	**0**	**0**
11.1	TAN CONCRETE	11	MEDIAN	387 CF	N	NAD	0	0	0
11.2	TAN CONCRETE	11	MEDIAN	387 CF	N	NAD	0	0	0
11.3	TAN CONCRETE	11	MEDIAN	387 CF	N	NAD	0	0	0
12.1	CLASS 5 COATING	12	RAIL AND OUTSIDE GIRDER	2,320 SF	N	NAD	0	0	0
12.2	CLASS 5 COATING	12	RAIL AND OUTSIDE GIRDER	2,320 SF	N	NAD	0	0	0
12.3	CLASS 5 COATING	12	RAIL AND OUTSIDE GIRDER	2,320 SF	N	NAD	0	0	0
12.4 QA/QC	CLASS 5 COATING	12	RAIL AND OUTSIDE GIRDER	2,320 SF	N	NAD	0	0	0

COMMENTS/NOTES:

Y – Yes
N – No
NA – Not Applicable
NAD – No Asbestos Detected
LF – Linear feet
SF – Square feet

CF – Cubic Feet
CAT I – Category I
CAT II – Category II
PC – Point Count Analysis
PS – Analyzed to first positive stop
Trace – Less than 1%

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trem. - tremolite
cro. - crocidolite

1. All quantities given in square feet unless otherwise indicated.

2. All costs provided assume one mobilization.

3. Shaded and bold text indicates Asbestos-Containing Material (ACM) or assumed ACM.

Subtotals for this page	2.000	800	0
Consultant Fees	See Last Page of Form 2		
O&M Costs	See Last Page of Form 2		
TOTAL	See Last Page of Form 2		

ASBESTOS SURVEY AND ASSESSMENT – FORM 2

Building Name: Bridge No. 130002, SR 55 (US 41) over SR 43 (US 301) Contract No.: BVD75
Date of Survey: July 2, 2014 Agency: Florida Department of Transportation District 1
Consultant: CB&I Environmental & Infrastructure, Inc. FDOT Contact Person: Jeffrey James

Sample No. or Assumed	Material Description	Homo-geneous Area No.	Area Description	Quantity (Total for HA)	Friable Y/N	Asbestos Type & % or Assumed	Response Cost	Air Mon Cost	Replace Cost
13.1	GRAY MASTIC	13	ABUTMENT	150 LF	N	NAD	0	0	0
13.2	GRAY MASTIC	13	ABUTMENT	150 LF	N	NAD	0	0	0
13.3	GRAY MASTIC	13	ABUTMENT	150 LF	N	NAD	0	0	0
14.1	CONCRETE	14	COLUMNS	774 SF	N	NAD	0	0	0
14.2	CONCRETE	14	COLUMNS	774 SF	N	NAD	0	0	0
14.3	CONCRETE	14	COLUMNS	774 SF	N	NAD	0	0	0
15.1	CONCRETE	15	RAILING	387 CF	N	NAD	0	0	0
15.2	CONCRETE	15	RAILING	387 CF	N	NAD	0	0	0
15.3	CONCRETE	15	RAILING	387 CF	N	NAD	0	0	0

COMMENTS/NOTES:

Y – Yes
N – No
NA – Not Applicable
NAD – No Asbestos Detected
LF – Linear feet
SF – Square feet

CF – Cubic Feet
CAT I – Category I
CAT II – Category II
PC – Point Count Analysis
PS – Analyzed to first positive stop
Trace – Less than 1%

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trem. - tremolite
cro. - crocidolite

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2. All costs provided assume one mobilization.

3. Shaded and bold text indicates Asbestos-Containing Material (ACM) or assumed ACM.

Subtotals for this page	0	0	0
Consultant Fees	1,800		
O & M Costs	0		
TOTAL	4,600		

ASBESTOS SURVEY REPORT – FORM 3

PERSONNEL SUMMARY

Bridge Name: SR 55 (US 41) over SR 43 (US 301) at Bridge 130002
Bridge No.: 152477
Date of Survey: July 2, 2014

Name and Address	Task Performed	License or Certificate
David W. Mosher, PE, LAC	Asbestos Consultant	EA-0000078
CB&I Environmental & Infrastructure, Inc. 9143 Philips Highway, Suite 400 Jacksonville, Florida 32256	Asbestos Business	ZA-317
Daniel Roebke CB&I Environmental & Infrastructure, Inc. 1228 Winter Garden Vineland Road Winter Garden, Florida 34787	Asbestos Inspector	146027-4599
Thomas Gregory, P.G. CB&I Environmental & Infrastructure, Inc. 1228 Winter Garden Vineland Road Winter Garden, Florida 34787	Asbestos Inspector	140134-4294
EMSL Analytical, Inc. (EMSL) 5125 Adanson Street, Suite 900 Orlando, Florida 32804	Bulk Analysis	NVLAP No. 101151-0
International Asbestos Testing Laboratory (IATL) 9000 Commerce Parkway, Suite B Mt. Laurel, New Jersey 08054	Quality Assurance	NVLAP No. 101165-0

SECTION 2

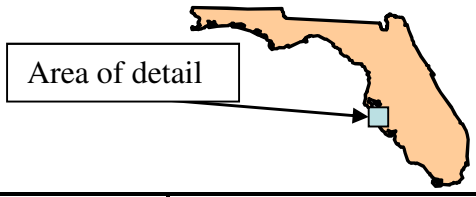
BRIDGE DIAGRAM(S)



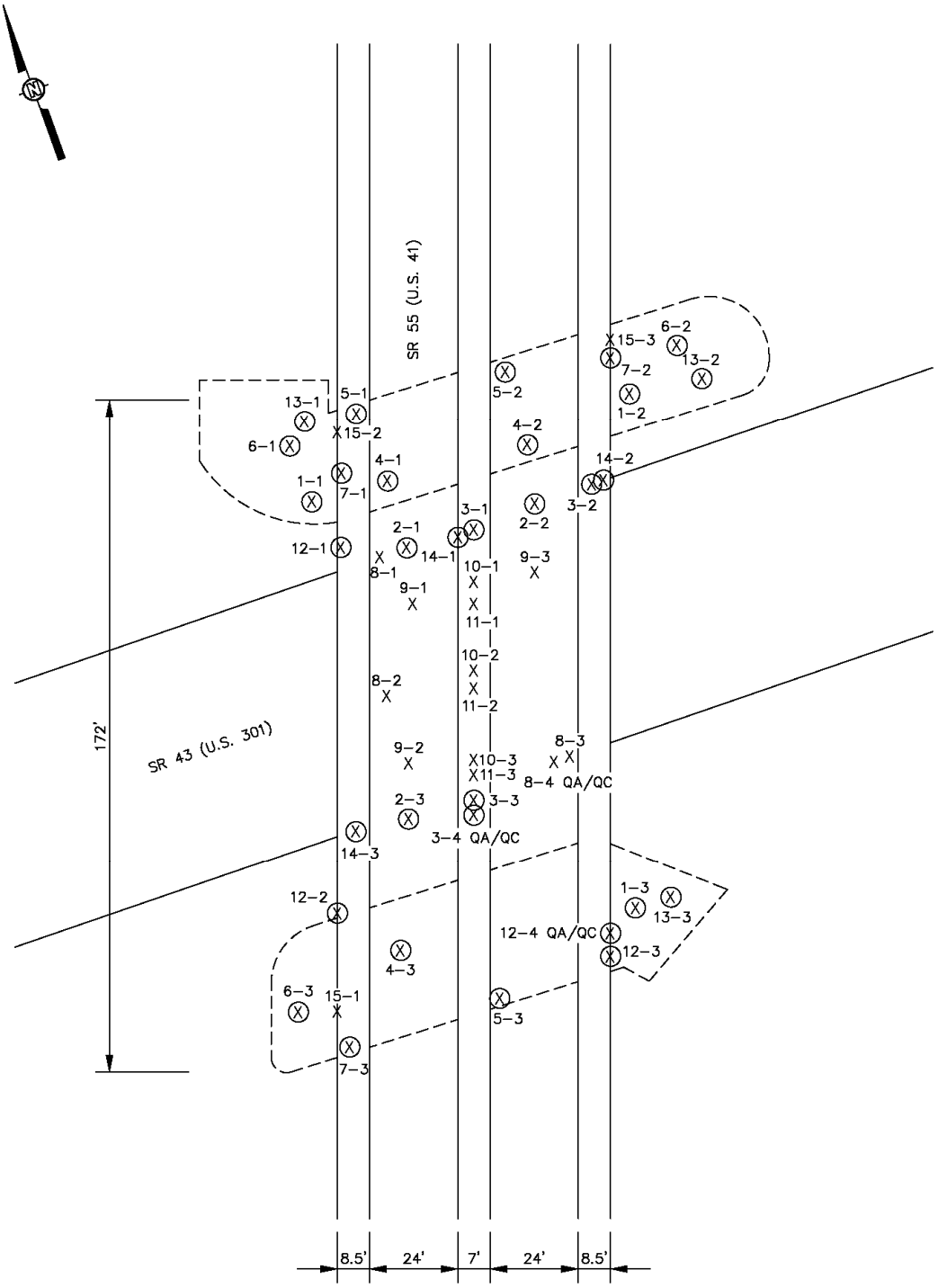
Legend

Not To Scale

Source Map – Google Earth



Prepared by	Survey Date	SR 55 (US 41) over SR 43 (US 301)	**Figure 1**
CB&I Environmental & Infrastructure, Inc.	July 2, 2014 Project No. 152477	Bridge No. 130002 Manatee County FL	**Site Location Map**



Legend Not To Scale	X Asbestos Sampling Location (X) Asbestos Sampling Location on Underside of Bridge	QA/QC Quality Assurance/ Quality Control Sampling Location	
Prepared by **CB&I Environmental & Infrastructure, Inc.**	Survey Date: July 2, 2014 Project No.152477	SR 55 (US 41) over SR 43 (US 301) Bridge 130002 Manatee County FL	**Figure 2** **Sample Location Map**

N:\Clients\FDOT FILES\FDOT 1 (BDV 75)\PROJECTS\152477 (LOA Z) - Asbestos Survey, SR 555 (US414) over SR42, Bridge 13002, Bredenton\5.0 Report\2014-09 AsbSurvey\152477 ASB SURVEY_Bridge 130002_111214 FINAL.docx

SECTION 3

PHOTOGRAPHS

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG



PHOTO 1 – 07/02/14
BRIDGE NO. 130002 – SR 55 (US 41) OVER SR 43 (US 301)
BRADENTON, MANATEE COUNTY, FL



PHOTO 2 – 07/02/14
BRIDGE NO. 130002 – SR 55 (US 41) OVER SR 43 (US 301)
BRADENTON, MANATEE COUNTY, FL

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG



PHOTO 3 – 07/02/14
BRIDGE NO. 130002 – SR 55 (US 41) OVER SR 42 (US 301)
BRADENTON, MANATEE COUNTY, FL

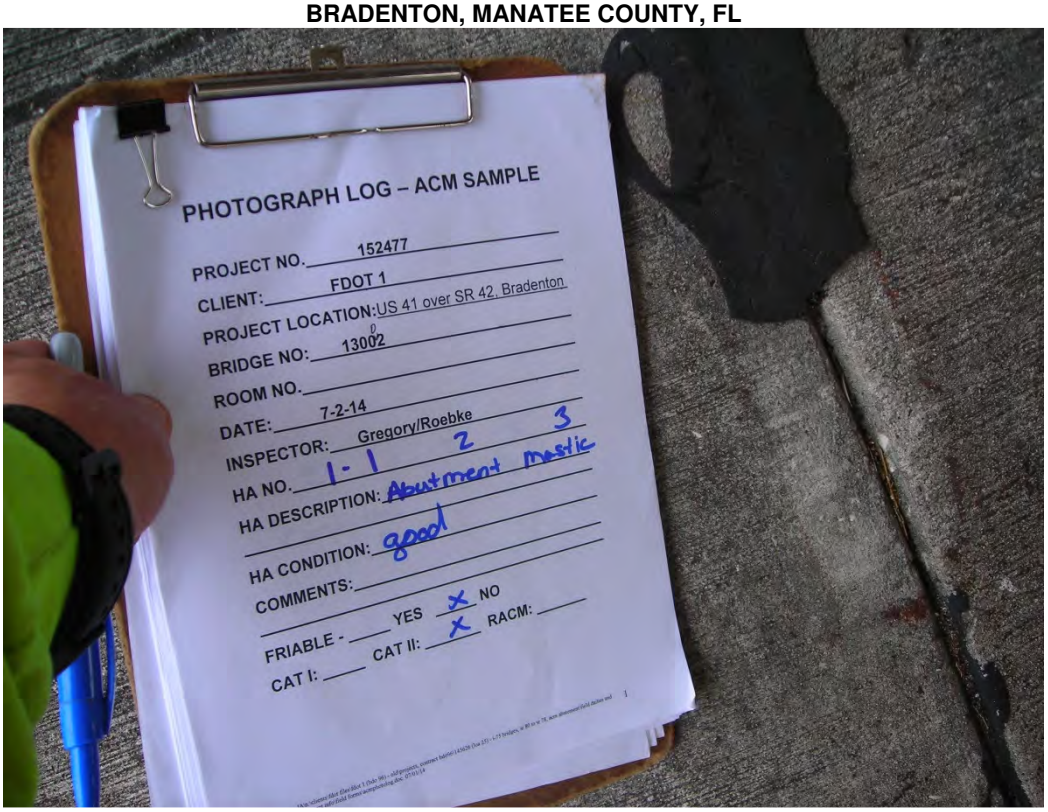


PHOTO 4 – 07/02/14 – SAMPLE 1.1 – HA 1
BLACK MASTIC
ABUTMENT

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

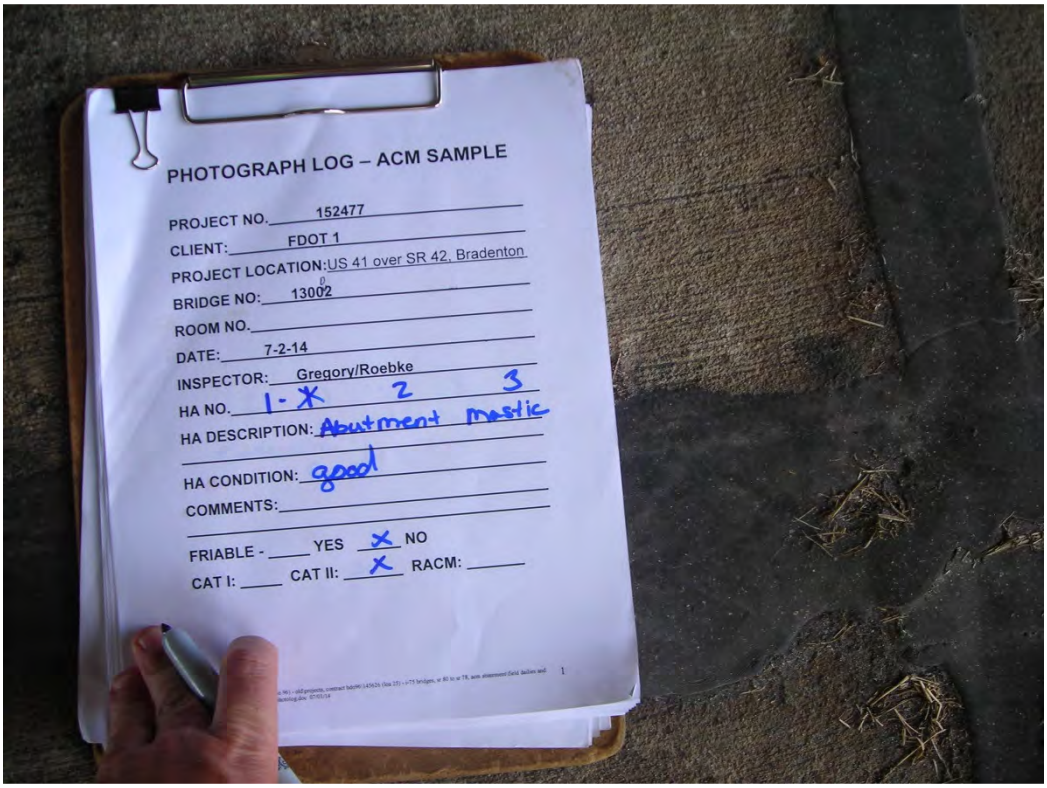


PHOTO 5 – 07/02/14 – SAMPLE 1.2 – HA 1
BLACK MASTIC
ABUTMENT

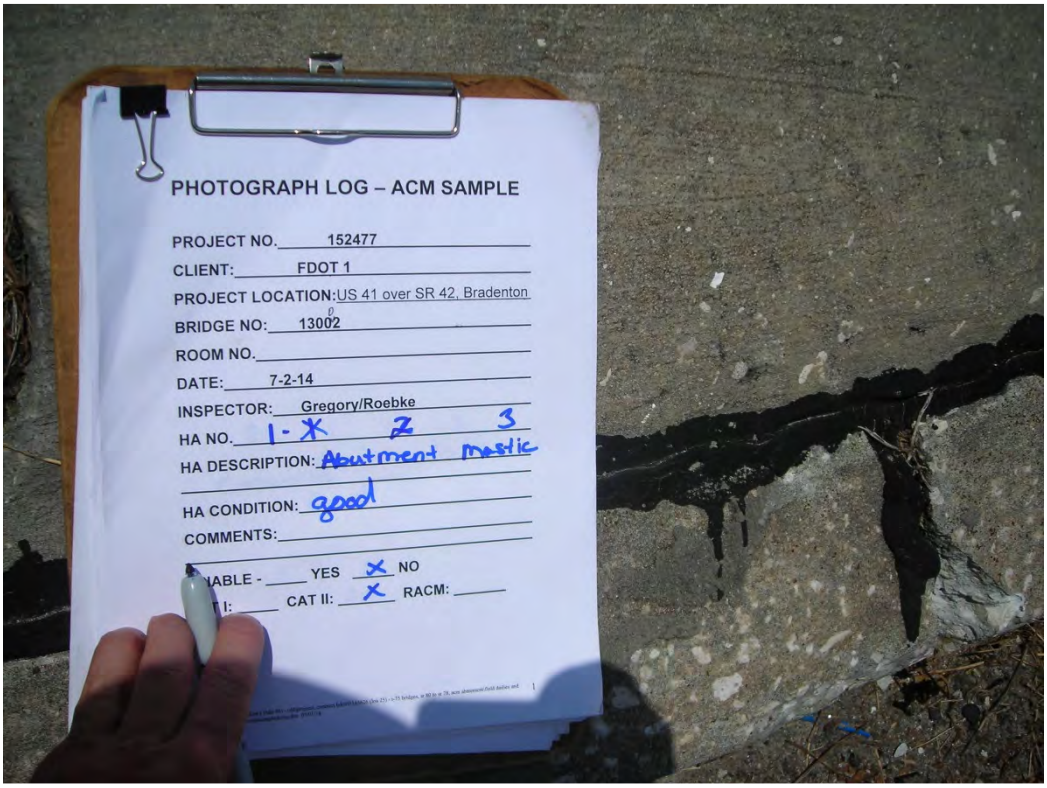


PHOTO 6 – 07/02/14 – SAMPLE 1.3 – HA 1
BLACK MASTIC
ABUTMENT

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

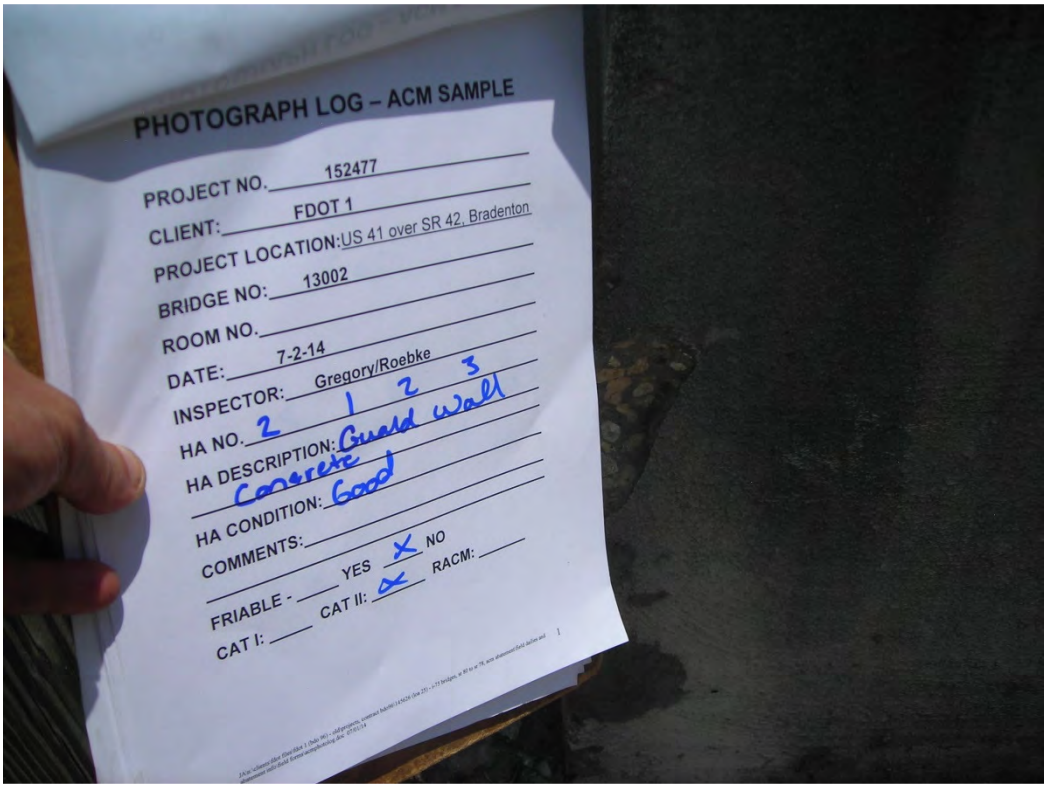


PHOTO 7 – 07/02/14 – SAMPLE 2.1 – HA 2
CONCRETE
GUARD RAIL WALL



PHOTO 8 – 07/02/14 – SAMPLE 2.2 – HA 2
CONCRETE
GUARD RAIL WALL

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

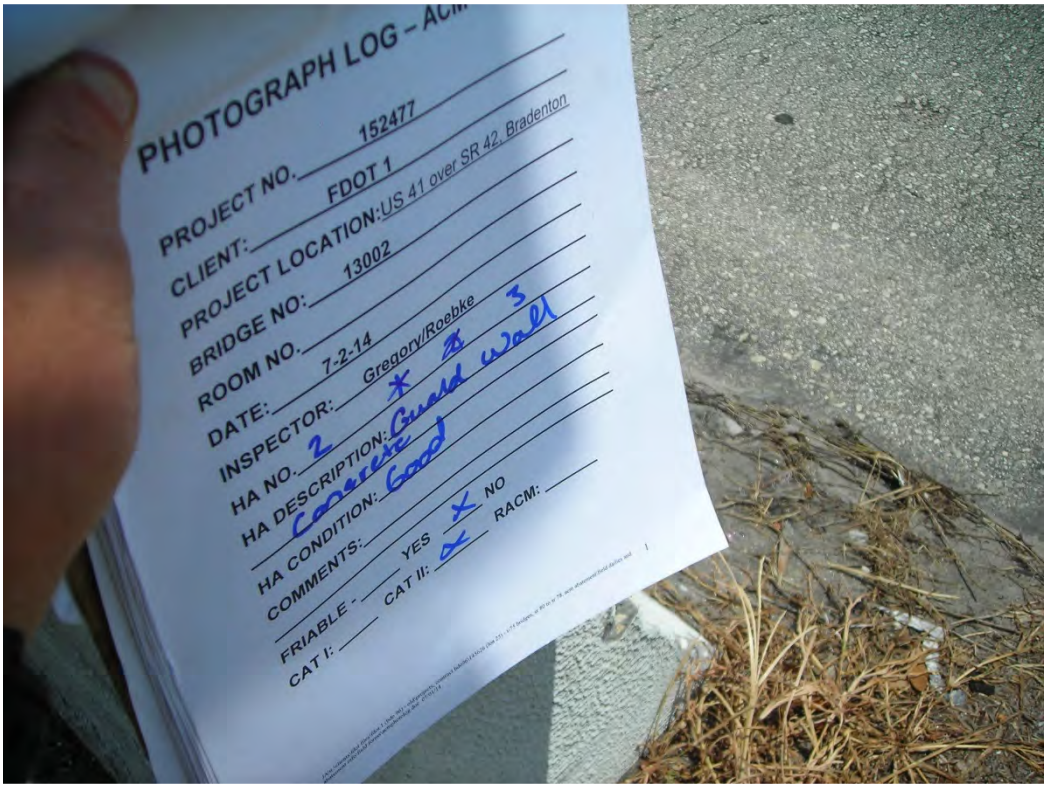


PHOTO 9 – 07/02/14 – SAMPLE 2.3 – HA 2
CONCRETE
GUARD RAIL WALL

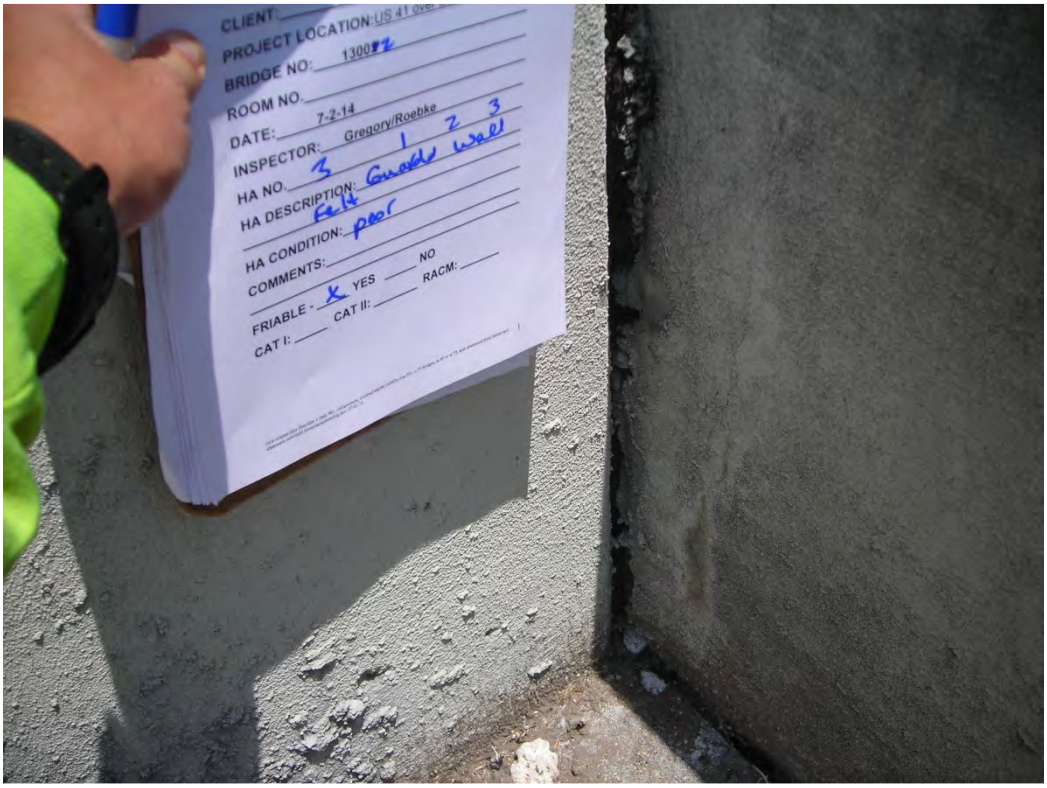


PHOTO 10 – 07/02/14 – SAMPLE 3.1 – HA 3
BLACK FELT
BETWEEN COLUMNS AND GUARD RAIL WALL

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

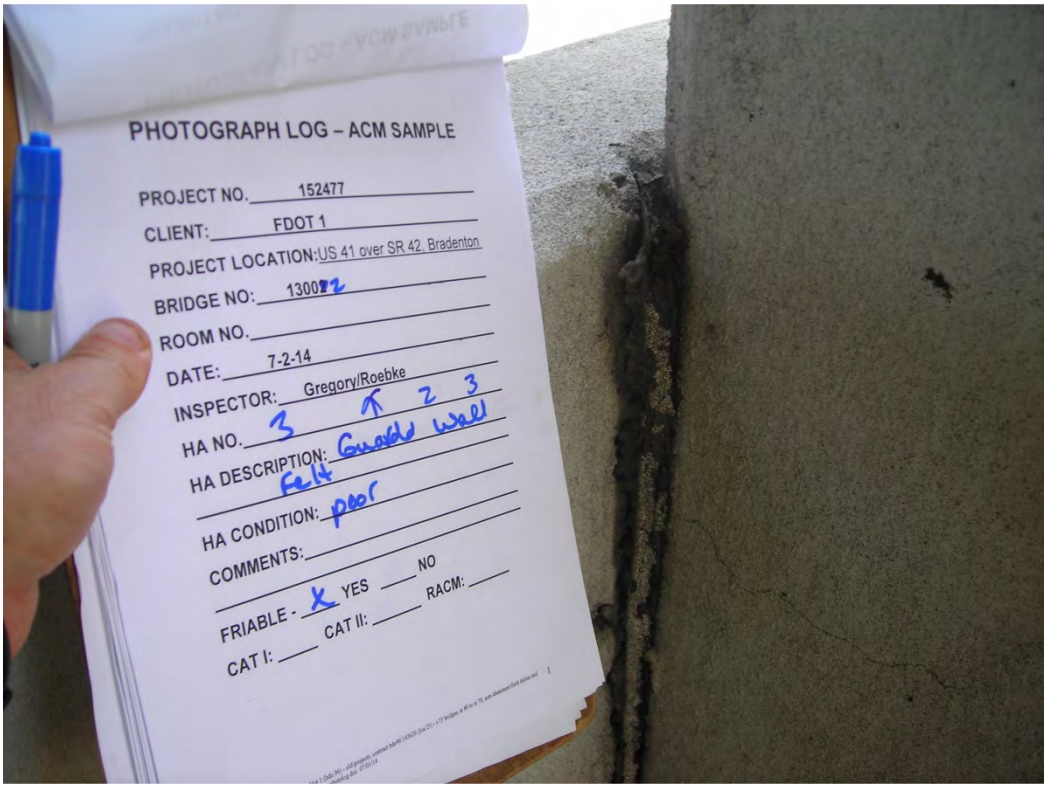


PHOTO 11 – 07/02/14 – SAMPLE 3.2 – HA 3
BLACK FELT
BETWEEN COLUMNS AND GUARD RAIL WALL

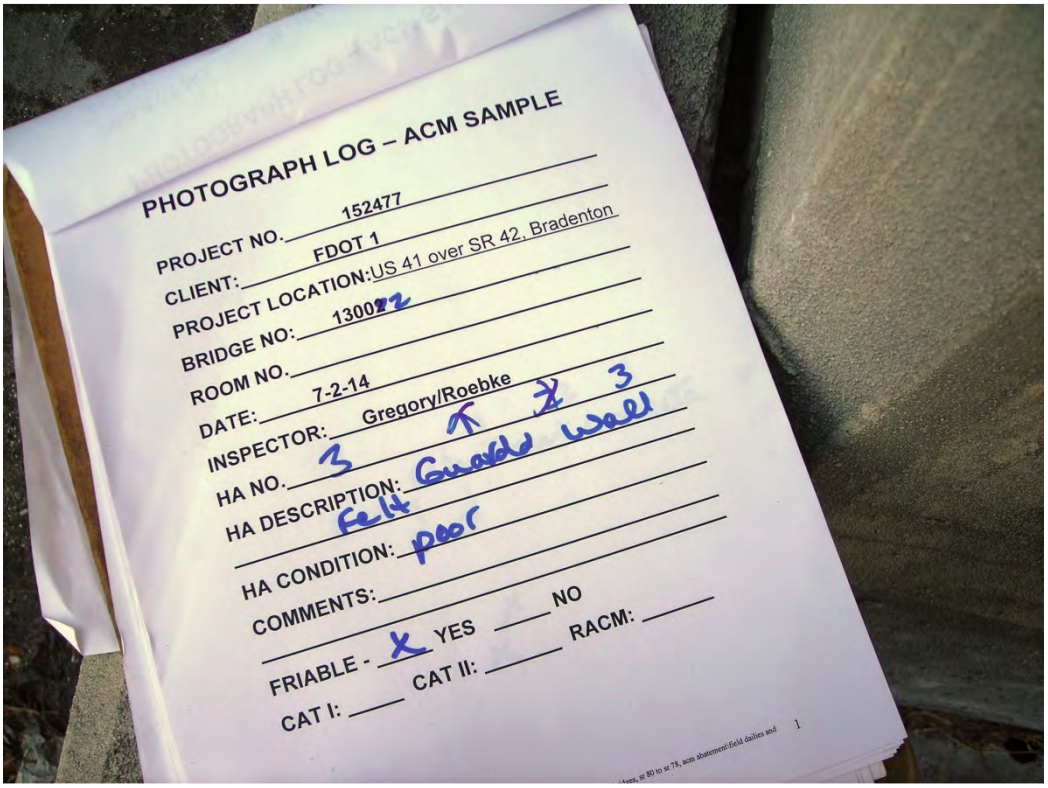


PHOTO 12 – 07/02/14 – SAMPLE 3.3 – HA 3
BLACK FELT
BETWEEN COLUMNS AND GUARD RAIL WALL

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

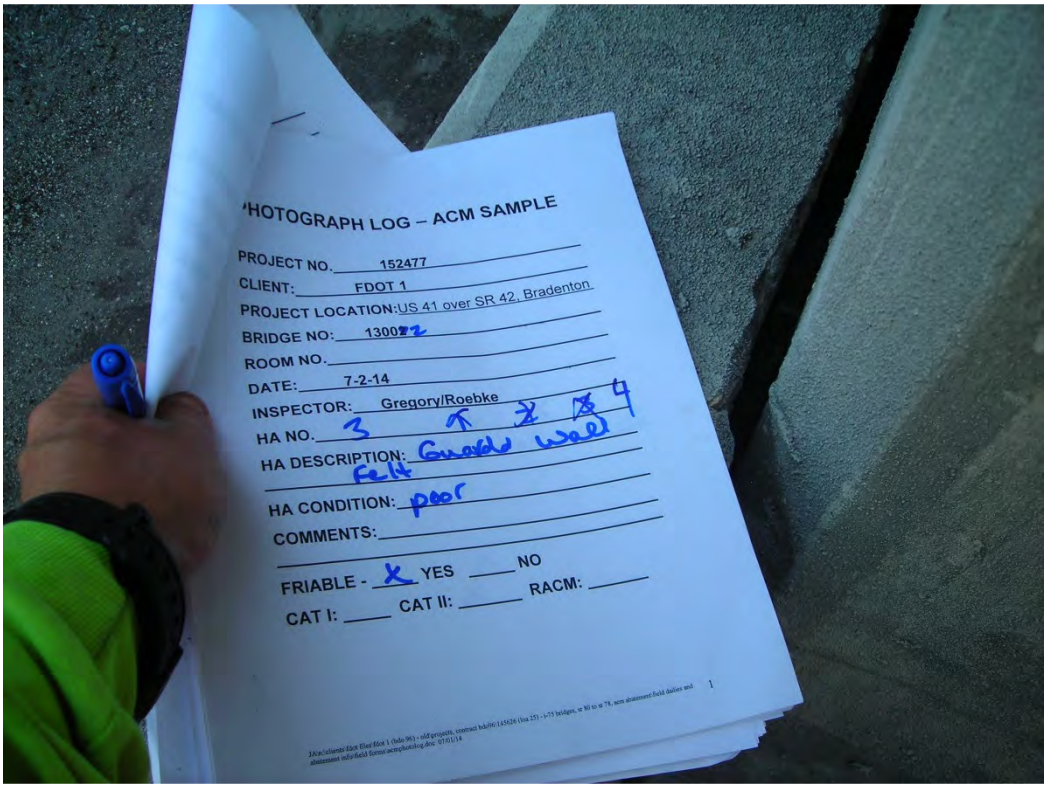


PHOTO 13 – 07/02/14 – SAMPLE 3.4 QA/QC – HA 3
BLACK FELT
BETWEEN COLUMNS AND GUARD RAIL WALL

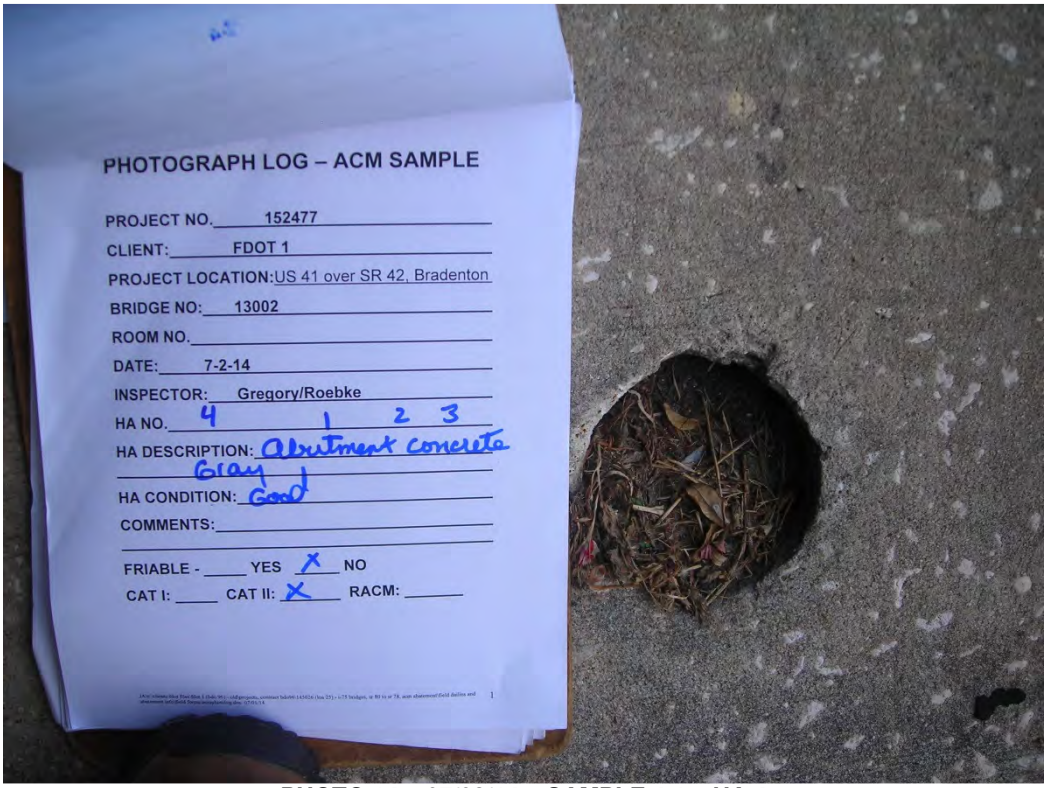


PHOTO 14 – 07/02/14 – SAMPLE 4.1 – HA 4
CONCRETE
ABUTMENT

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG



PHOTO 15 – 07/02/14 – SAMPLE 4.2 – HA 4
CONCRETE
ABUTMENT

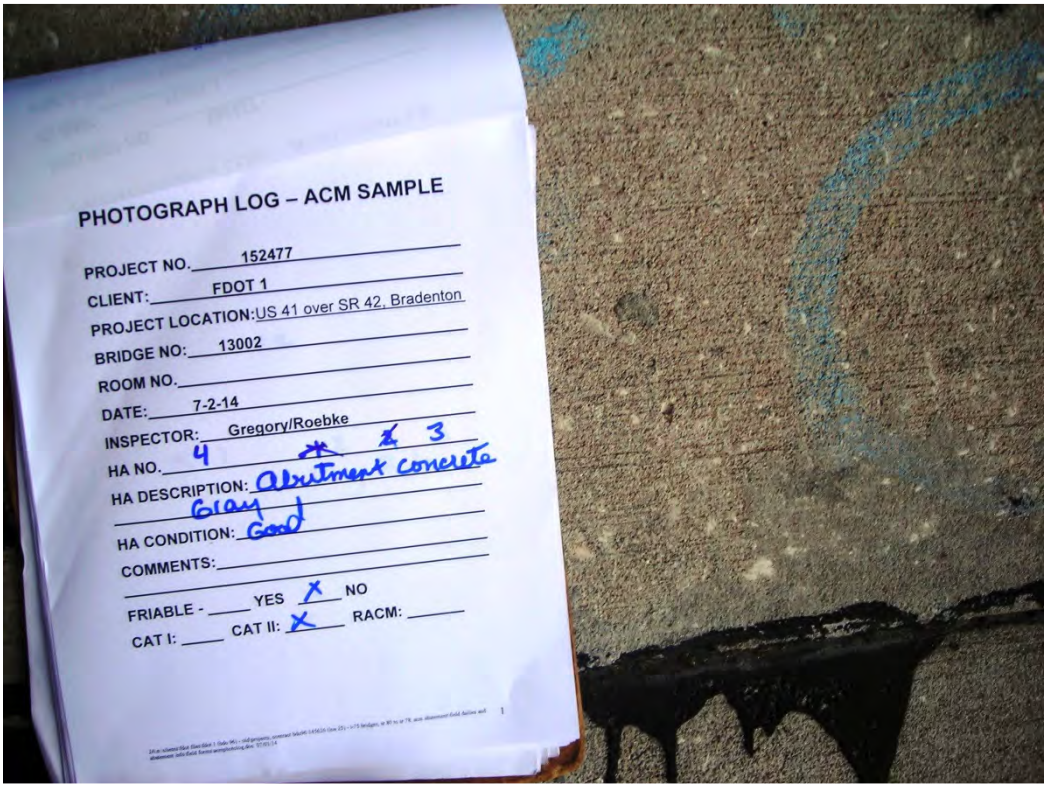


PHOTO 16 – 07/02/14 – SAMPLE 4.3 – HA 4
CONCRETE
ABUTMENT

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

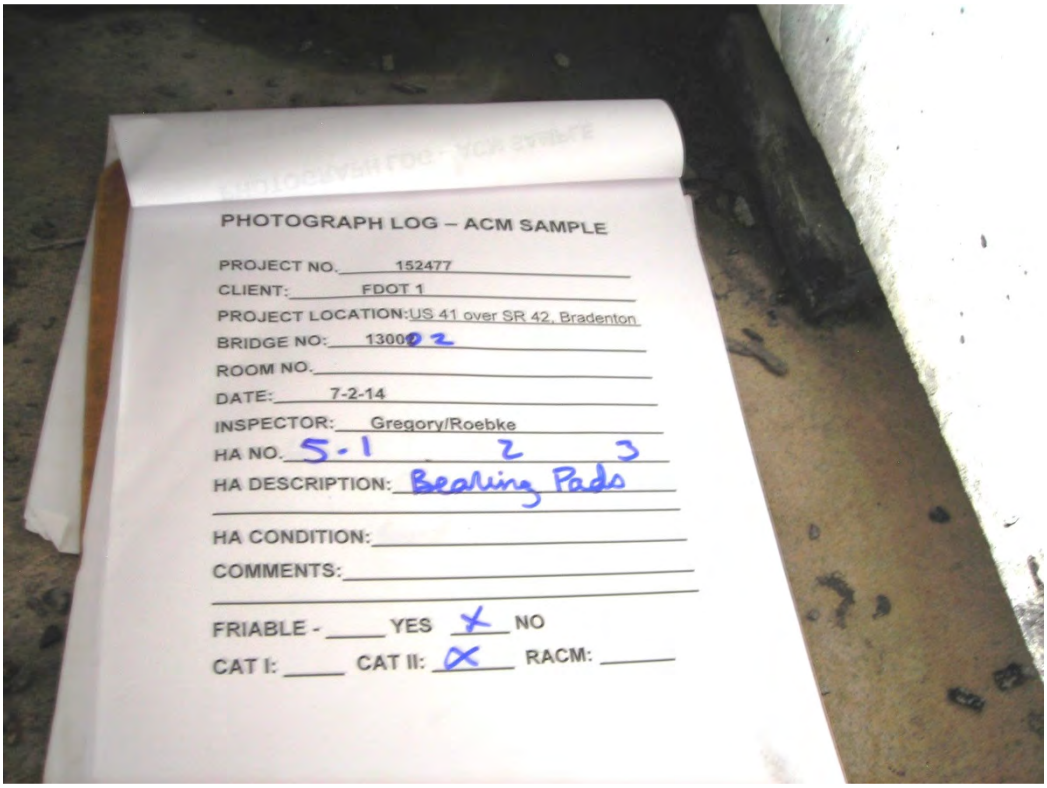


PHOTO 17 – 07/02/14 – 5.1 – HA 5
BLACK RUBBER
BEARING PADS

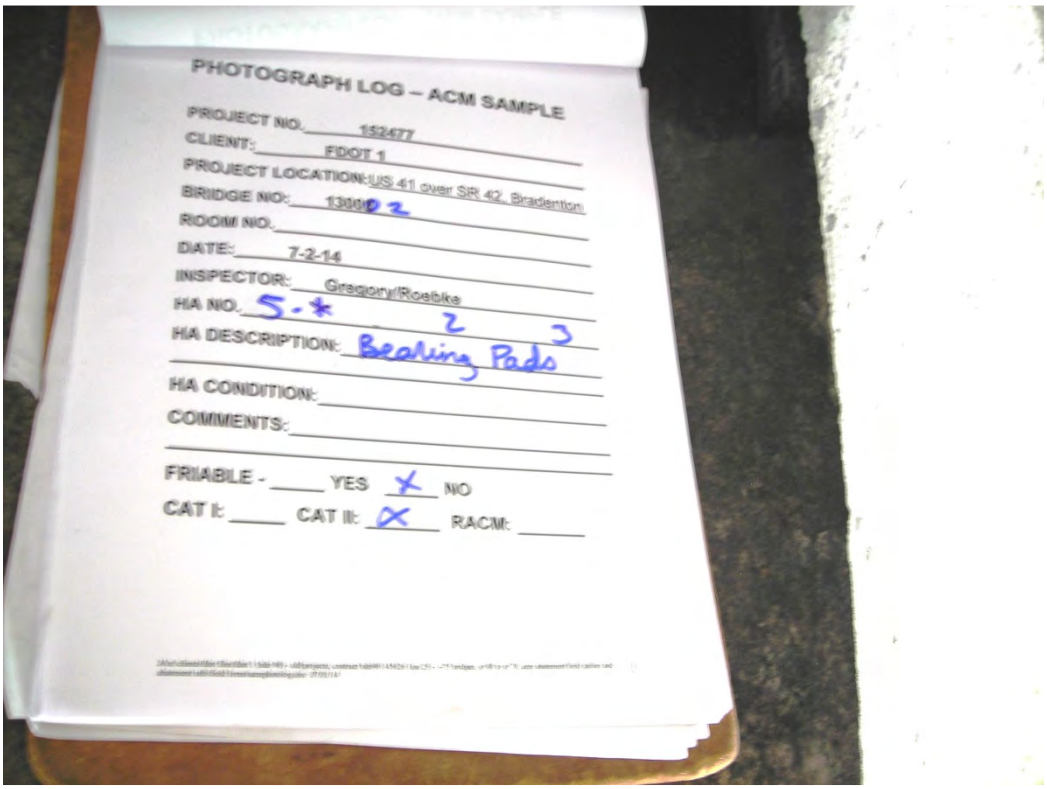


PHOTO 18 – 07/02/14 – SAMPLE 5.2– HA 5
BLACK RUBBER
BEARING PADS

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

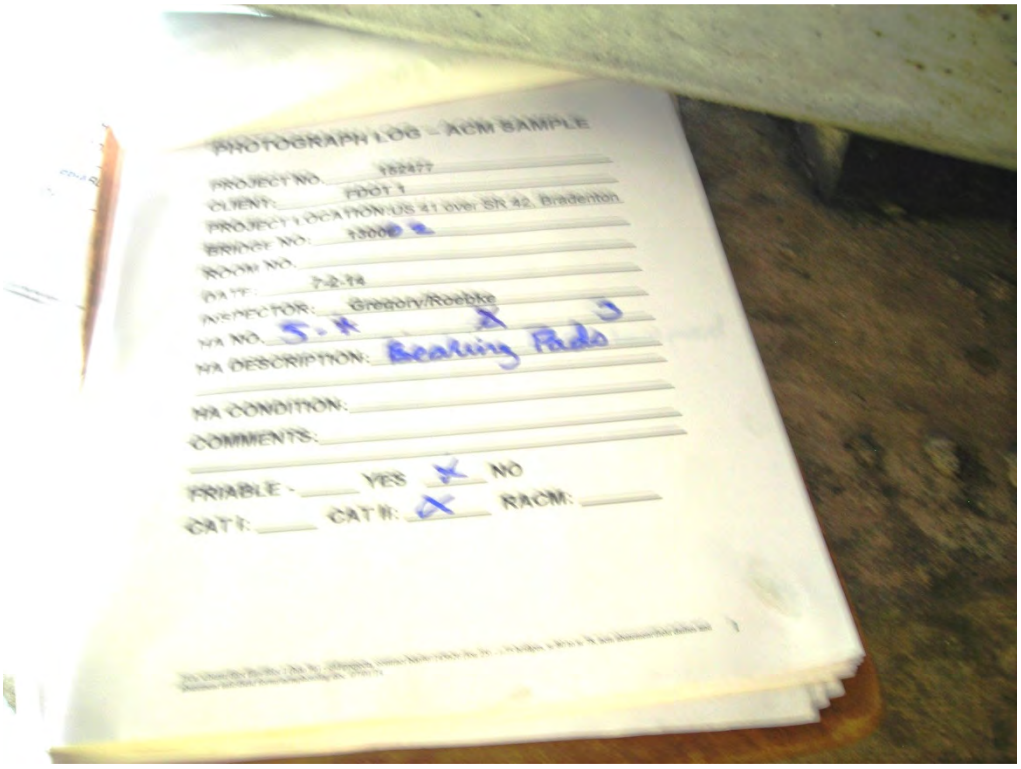


PHOTO 19 – 07/02/14 – SAMPLE 5.3– HA 5
BLACK RUBBER
BEARING PADS

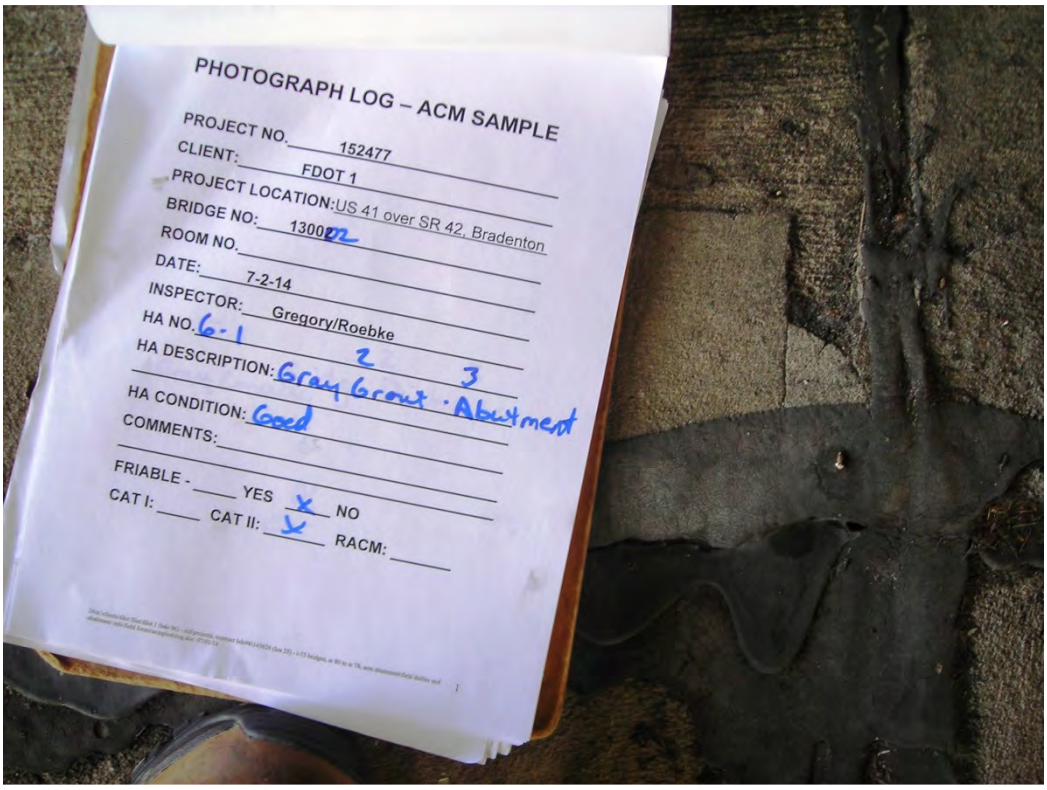


PHOTO 20 – 07/02/14 – SAMPLE 6.1– HA 6
GRAY GROUT
ABUTMENT

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

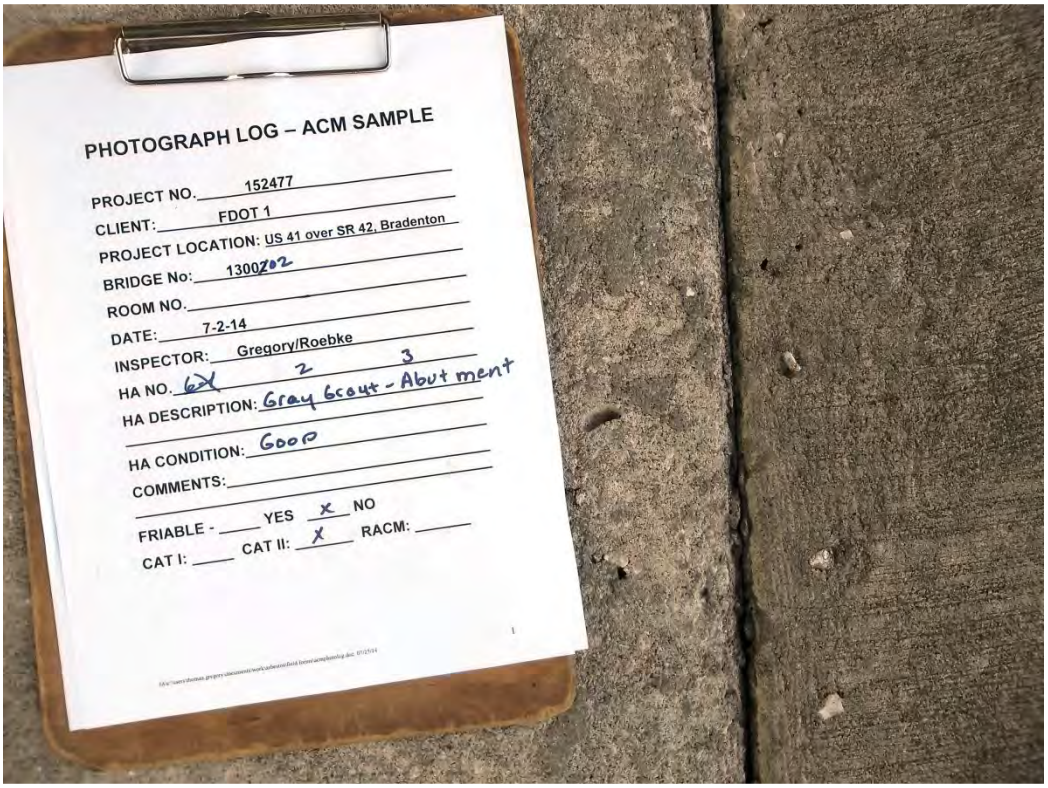


PHOTO 21 – 07/02/14 – SAMPLE 6.2 – HA 6
GRAY GROUT
ABUTMENT

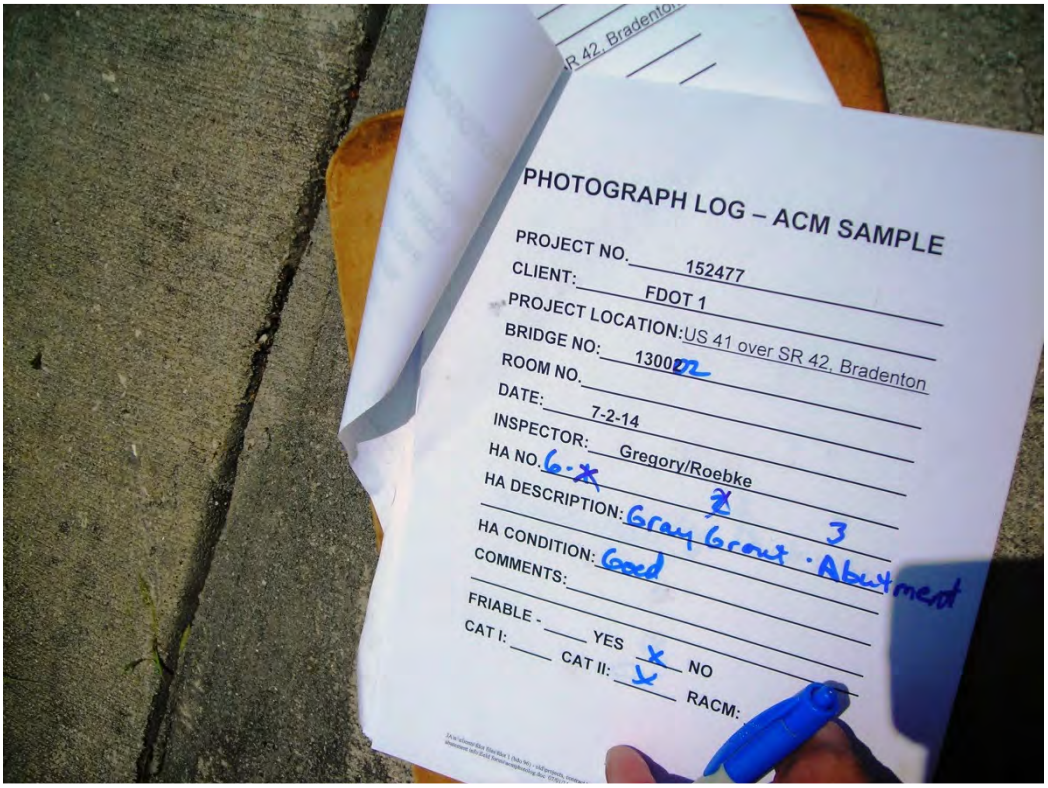


PHOTO 22 – 07/02/14 – SAMPLE 6.3 – HA 6
GRAY GROUT
ABUTMENT

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

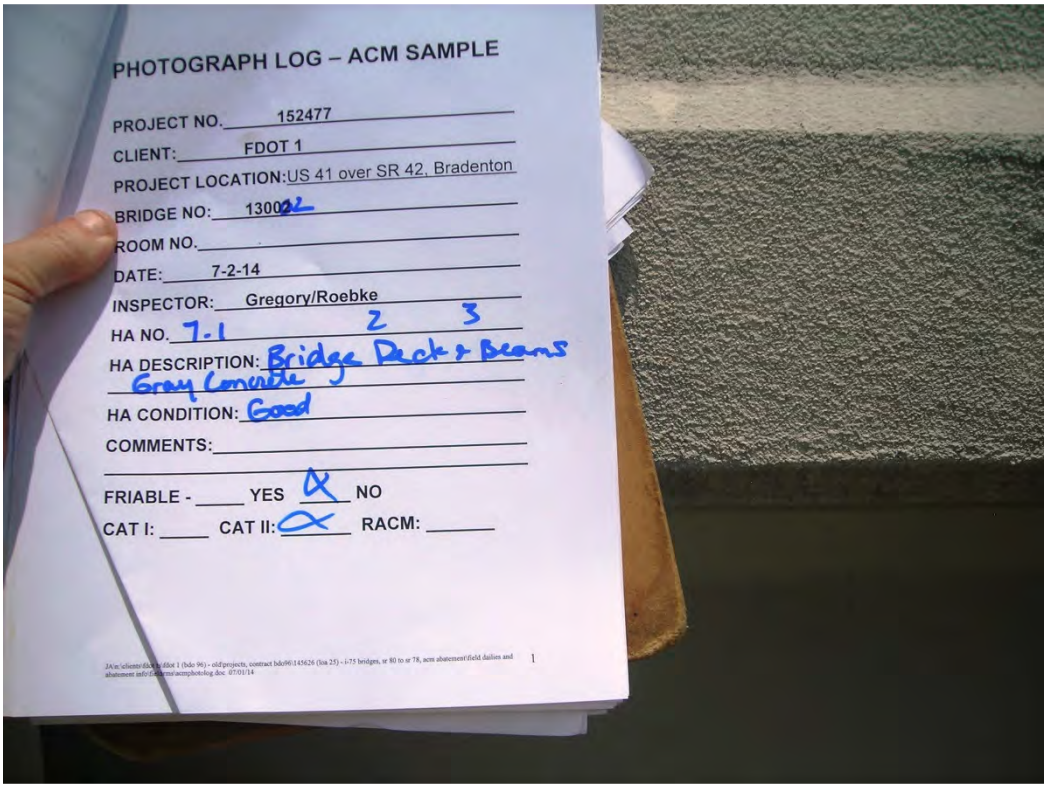


PHOTO 23 – 07/04/14 – SAMPLE 7.1 – HA 7
CONCRETE
BRIDGE DECK AND BEAMS

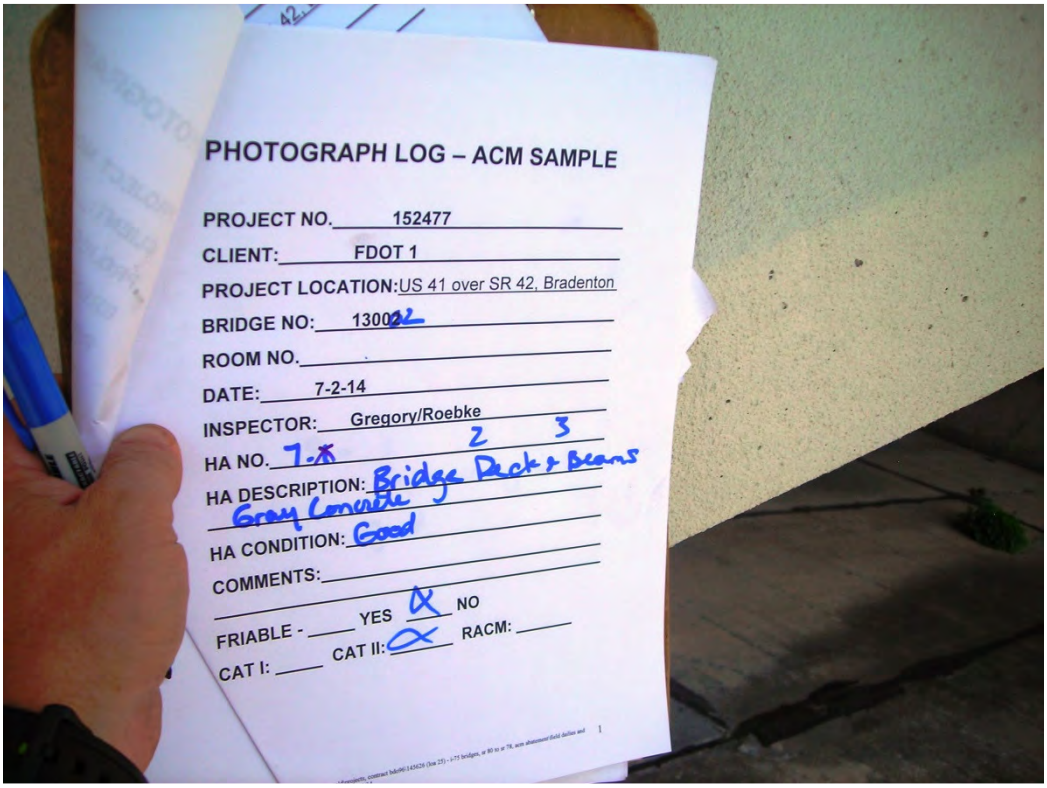


PHOTO 24 – 07/02/14 – SAMPLE 7.2 – HA 7
CONCRETE
BRIDGE DECK AND BEAMS

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

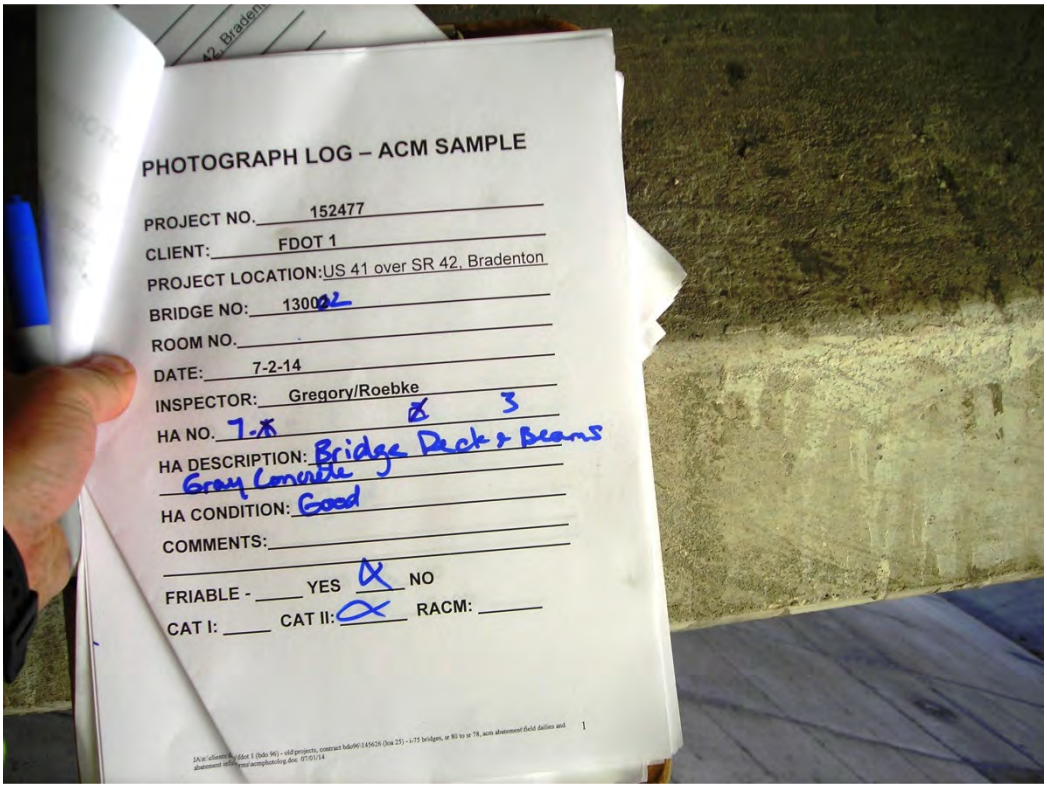


PHOTO 25 – 07/02/14 – SAMPLE 7.3 – HA 7
CONCRETE
BRIDGE DECK AND BEAMS



PHOTO 26 – 02/04/14 – SAMPLE 8.1 – HA 8
BLACK RUBBER
EXPANSION JOINT

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG



PHOTO 27 – 02/04/14 – SAMPLE 8.2 – HA 8
BLACK RUBBER
EXPANSION JOINT



PHOTO 28 – 03/25/14 – SAMPLE 8.3 – HA 8
BLACK RUBBER
EXPANSION JOINT

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

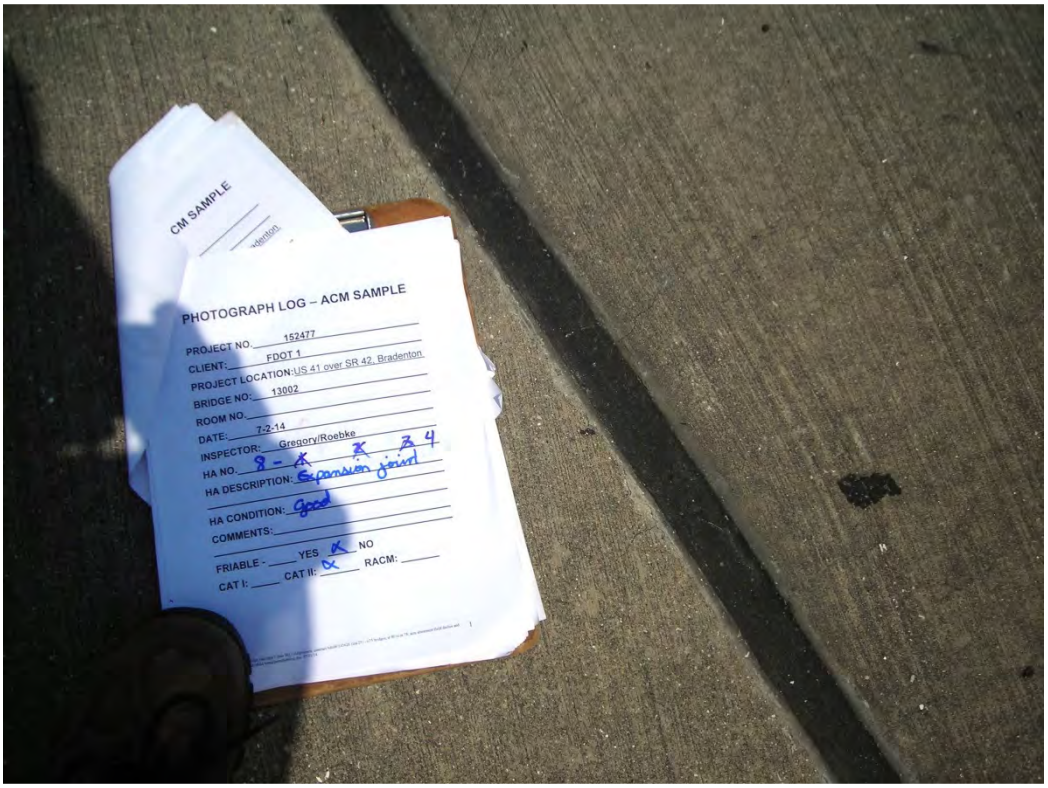


PHOTO 29 – 03/25/14 – SAMPLE 8.4 QA/QC – HA 8
BLACK RUBBER
EXPANSION JOINT

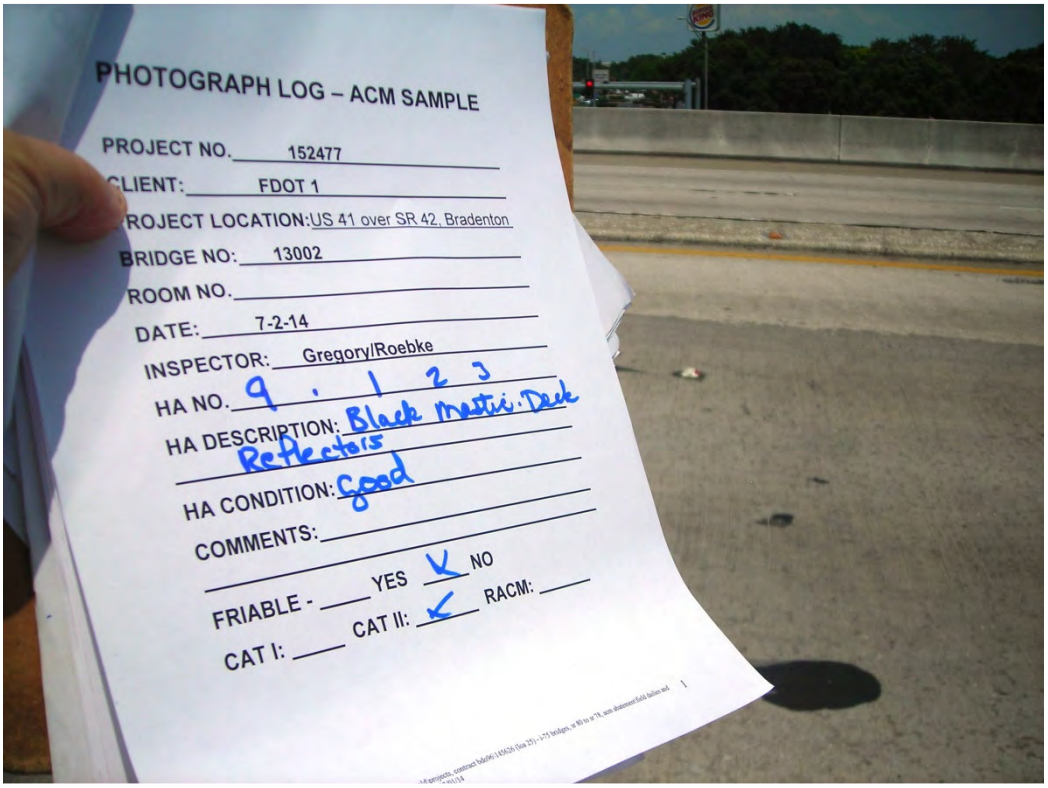


PHOTO 30 – 02/04/14 – SAMPLE 9.1 – HA 9
MASTIC
DECK REFLECTORS

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

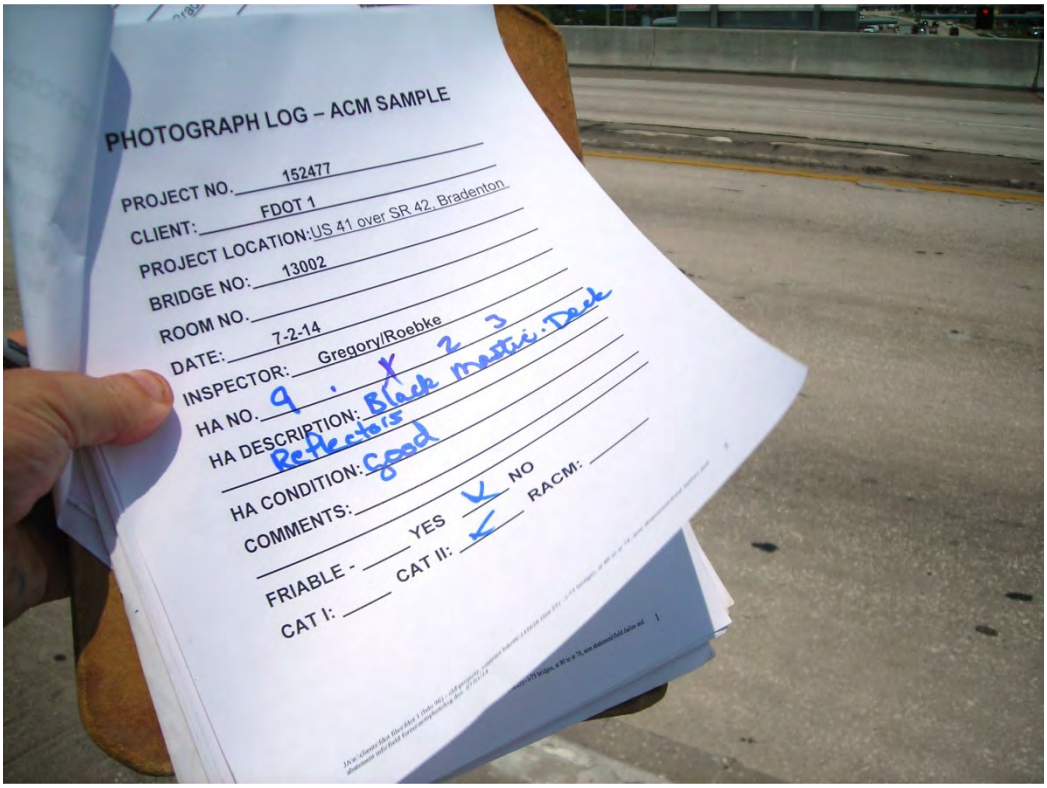


PHOTO 31 – 02/04/14 – SAMPLE 9.2 – HA 9
MASTIC
DECK REFLECTORS

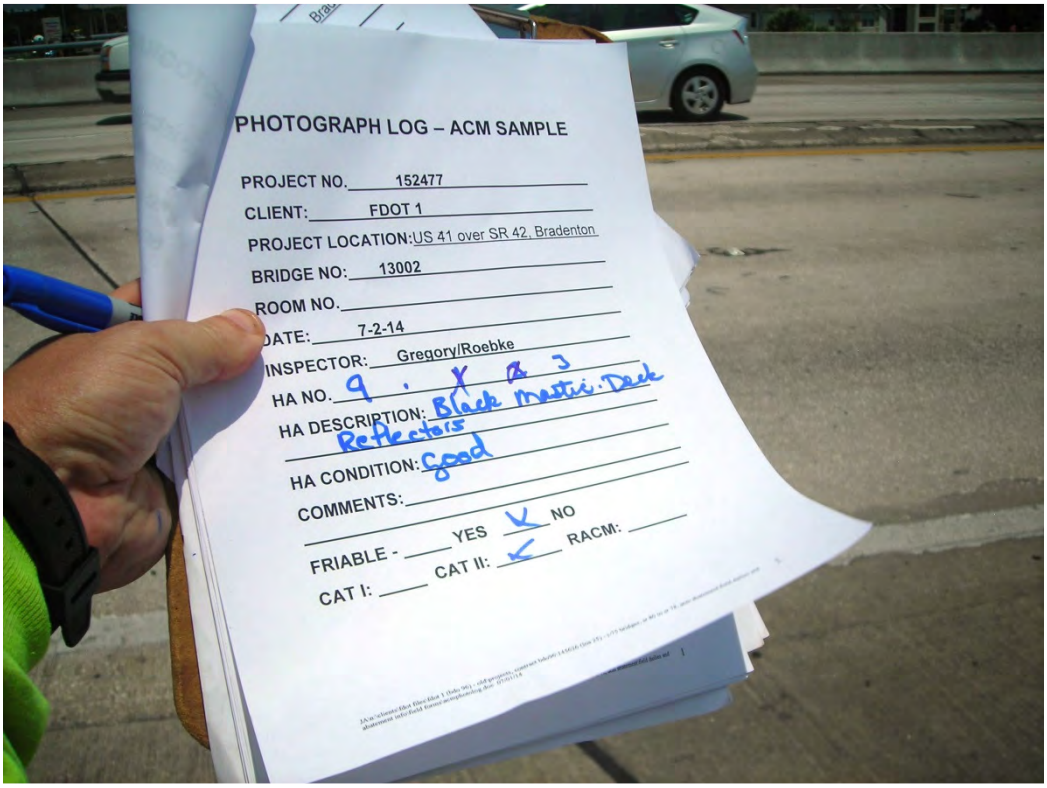


PHOTO 32 – 02/04/14 – SAMPLE 9.3 – HA 9
MASTIC
DECK REFLECTORS

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

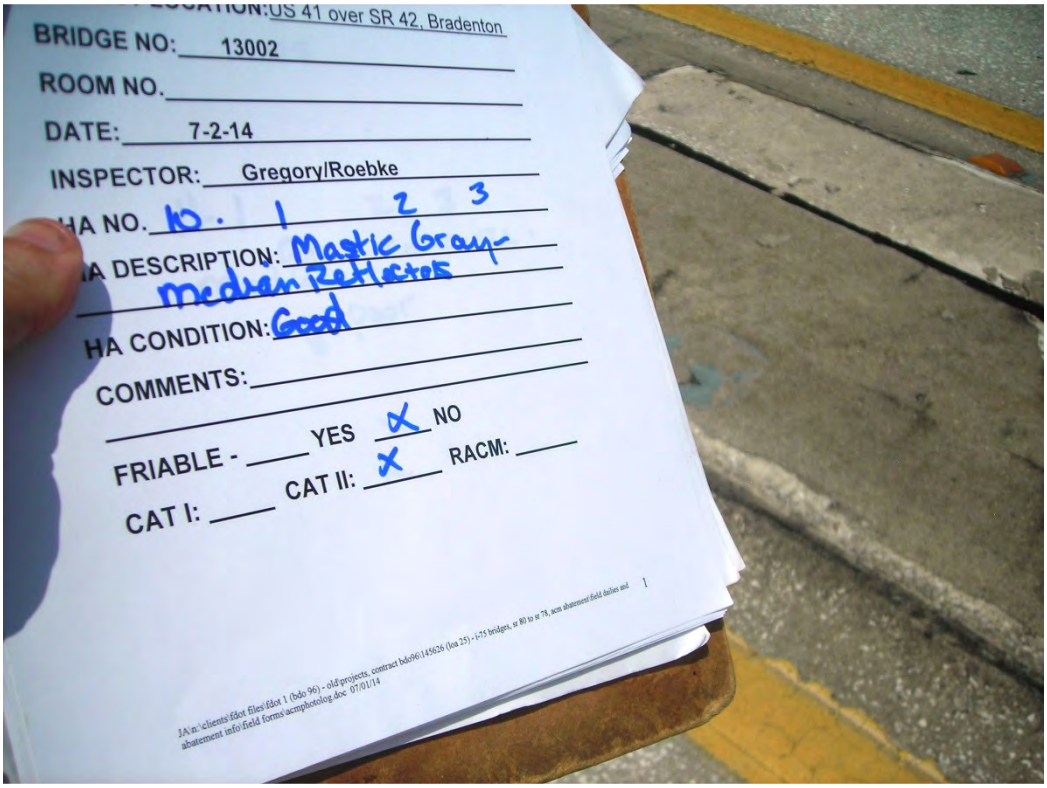


PHOTO 33 – 03/25/14 – SAMPLE 10.1 – HA 10
GRAY MASTIC
MEDIAN REFLECTORS

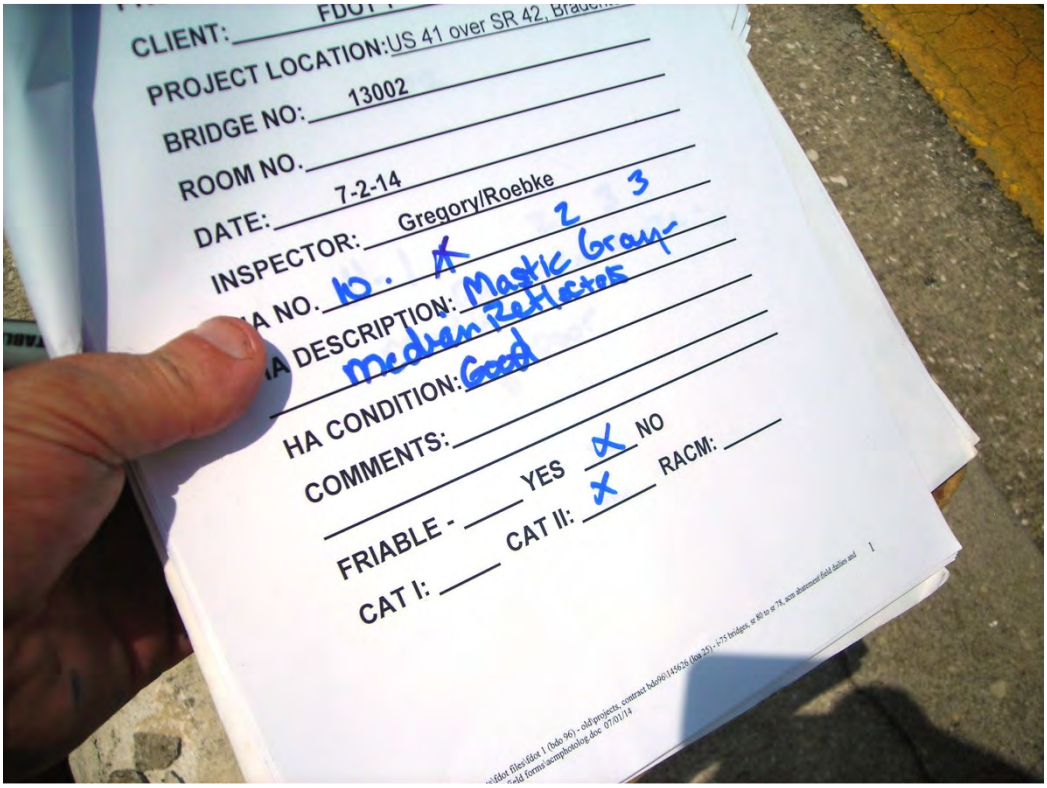


PHOTO 34 – 03/25/14 – SAMPLE 10.2 – HA 10
GRAY MASTIC
MEDIAN REFLECTORS

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

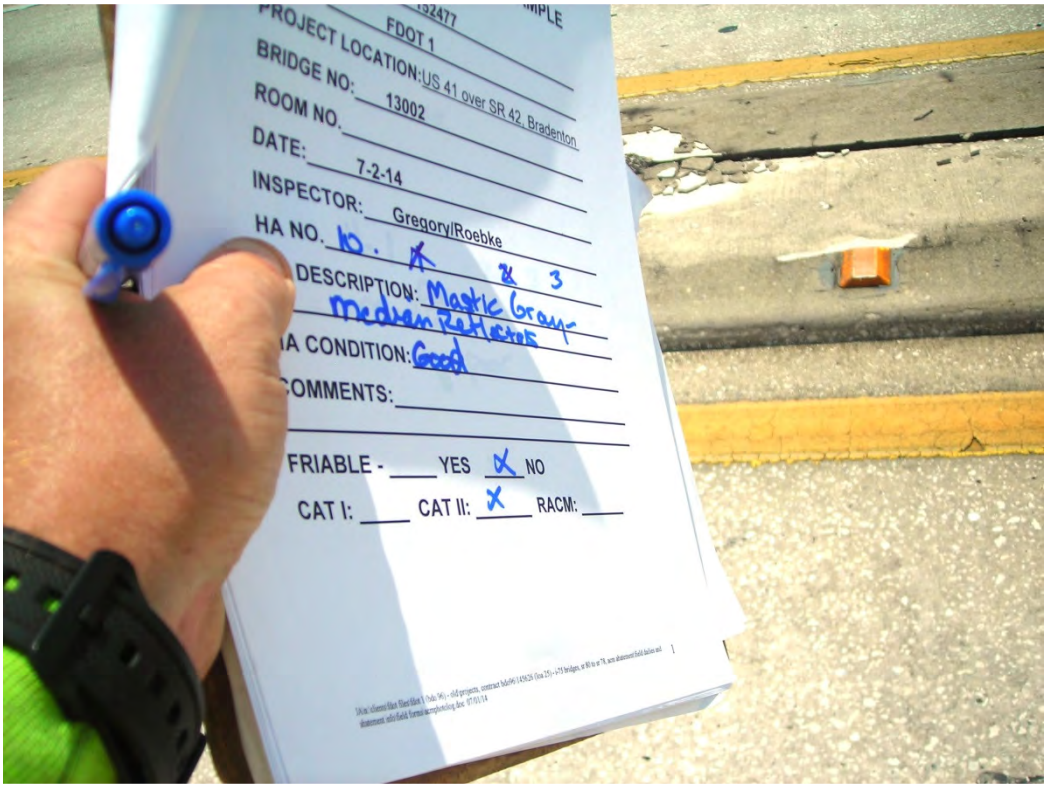


PHOTO 35 – 03/25/14 – SAMPLE 10.3 – HA 10
GRAY MASTIC
MEDIAN REFLECTORS



PHOTO 36 – 07/02/14 – SAMPLE 11.1 – HA 11
TAN CONCRETE
MEDIAN

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

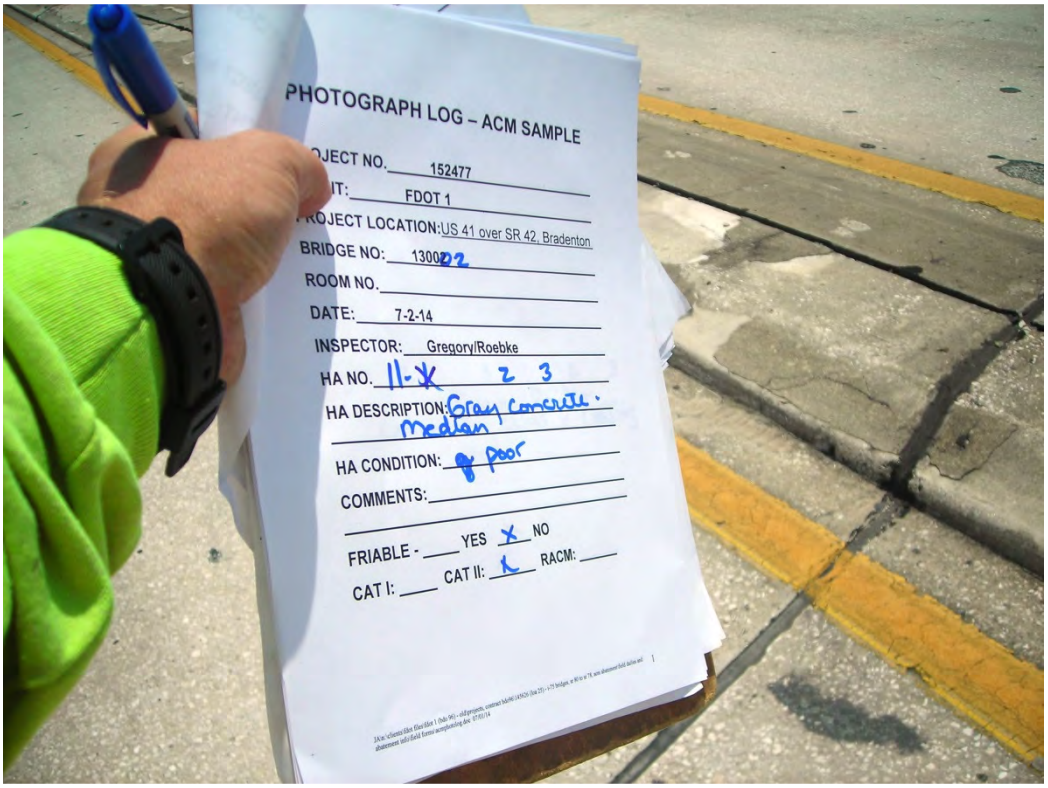


PHOTO 37 – 07/02/14 – SAMPLE 11.2 - HA 11
TAN CONCRETE
MEDIAN

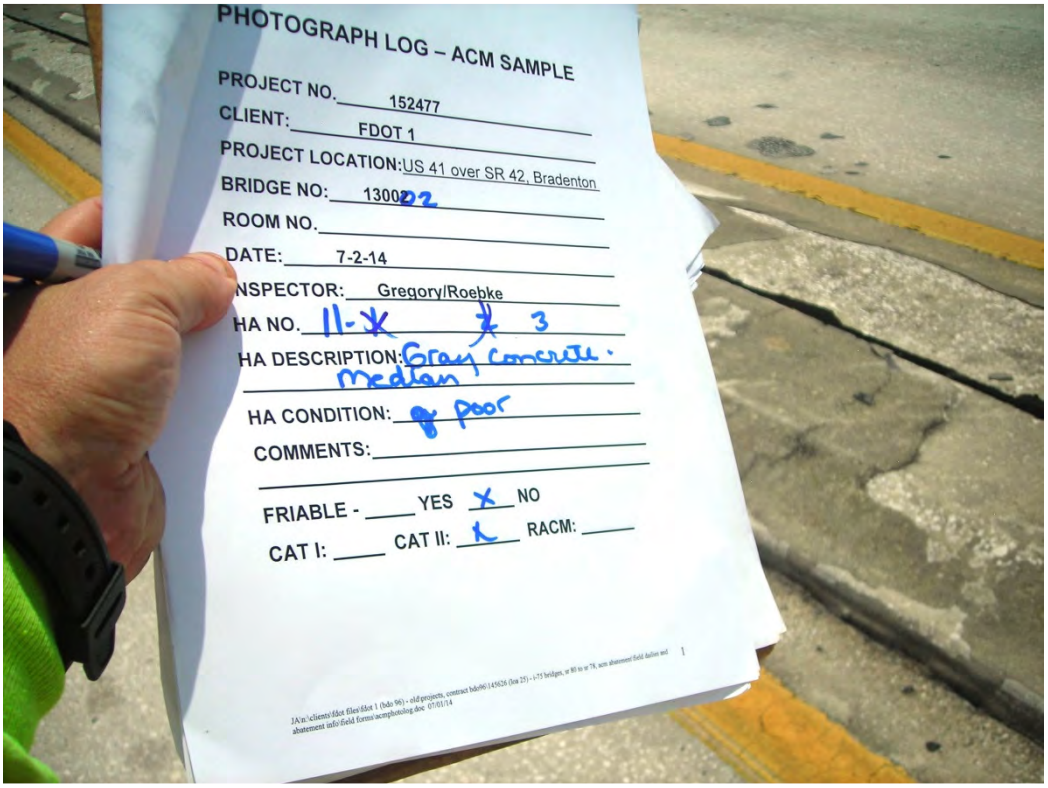


PHOTO 38 – 07/02/14 – SAMPLE 11.3 – HA 11
TAN CONCRETE
MEDIAN

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

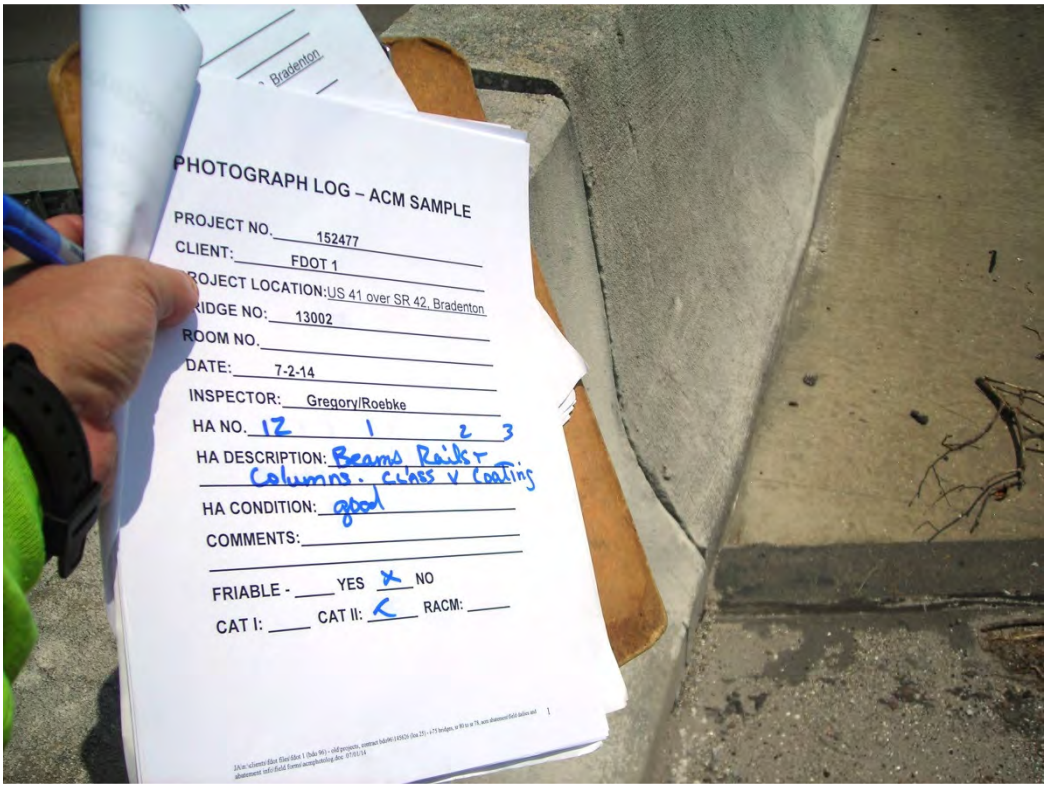


PHOTO 39 – 07/02/14 – SAMPLE 12.1 – HA 12
CLASS 5 COATING
RAIL AND OUTSIDE GIRDER

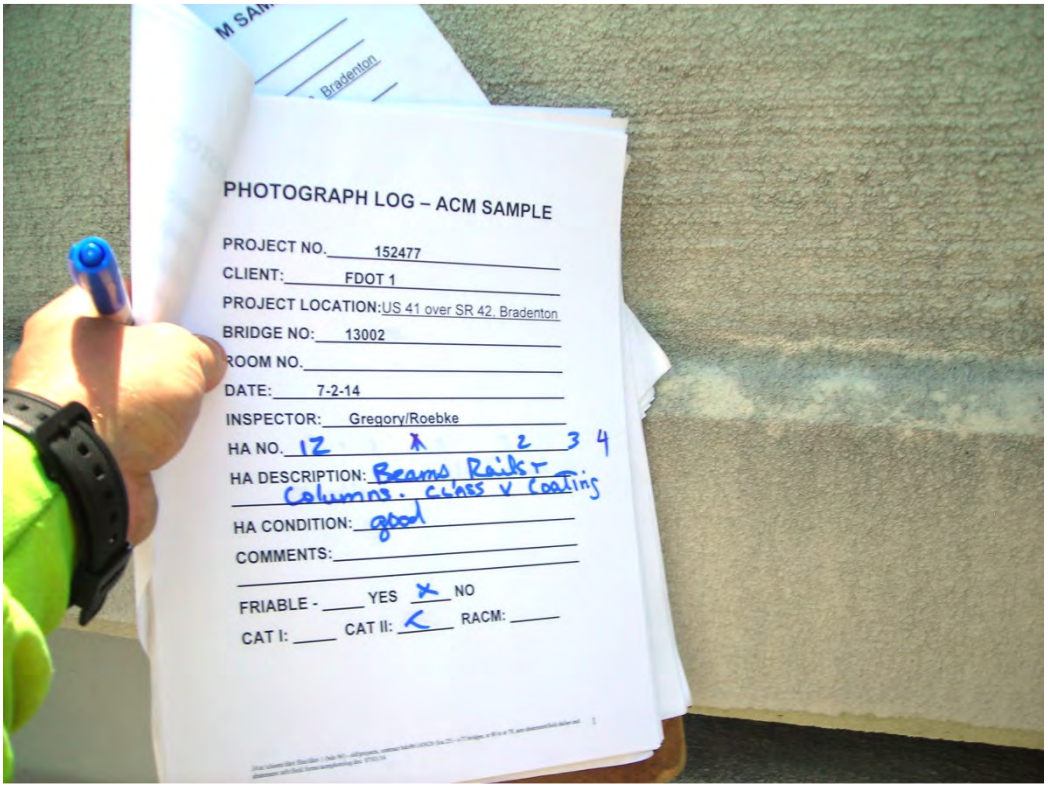


PHOTO 40 – 07/02/14 – SAMPLE 12.2 – HA 12
CLASS 5 COATING
RAIL AND OUTSIDE GIRDER

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

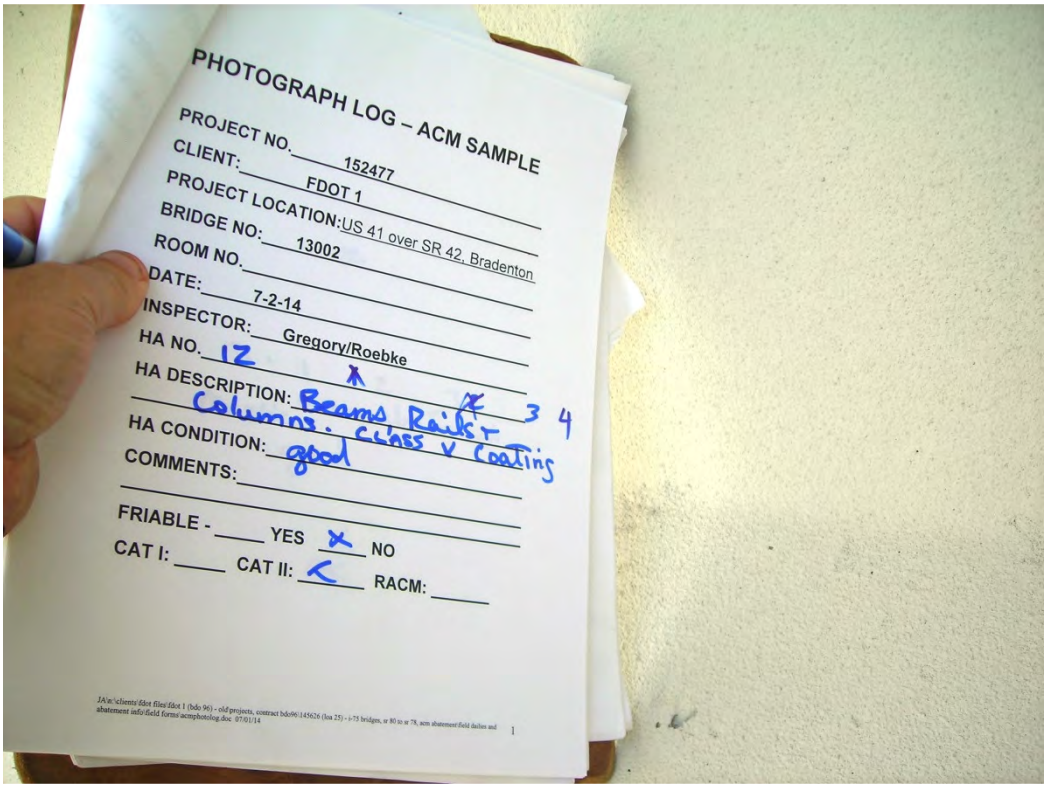


PHOTO 41 – 07/02/14 – SAMPLE 12.3 – HA 12
CLASS 5 COATING
RAIL AND OUTSIDE GIRDER

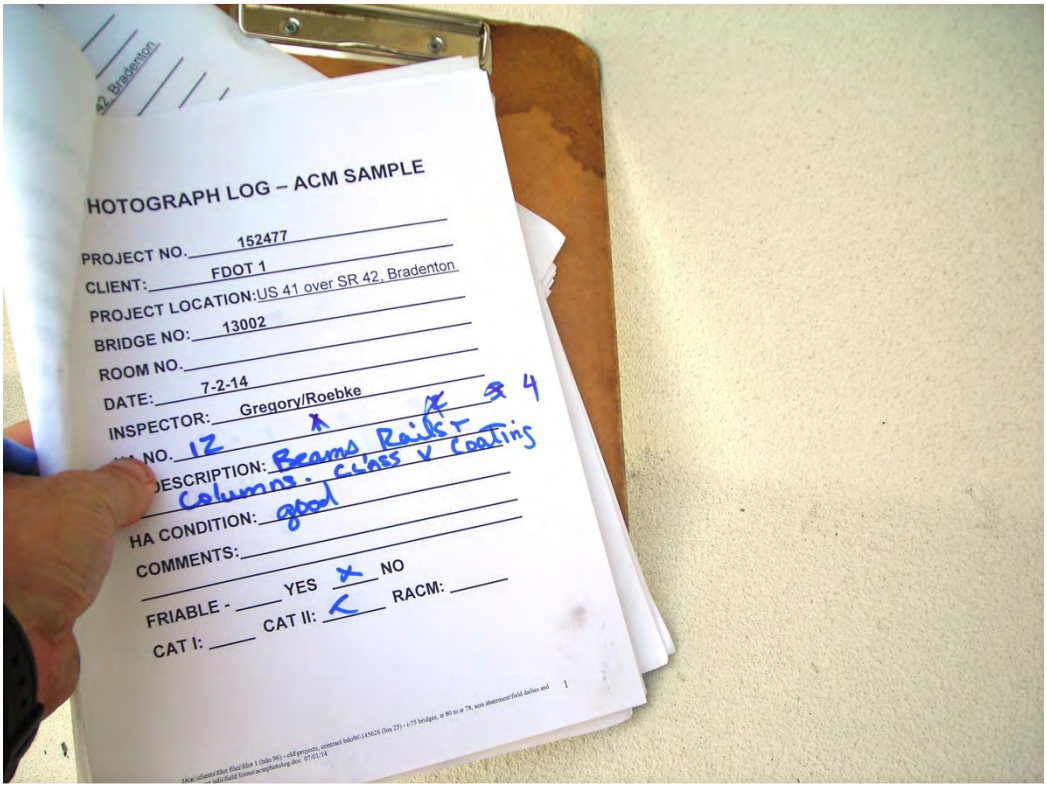


PHOTO 42 – 07/02/14 – SAMPLE 12.4 QA/QC – HA 12
CLASS 5 COATING
RAIL AND OUTSIDE GIRDER

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG



PHOTO 43 – 07/02/14 – SAMPLE 13.1 – HA 13
GRAY MASTIC
ABUTMENT

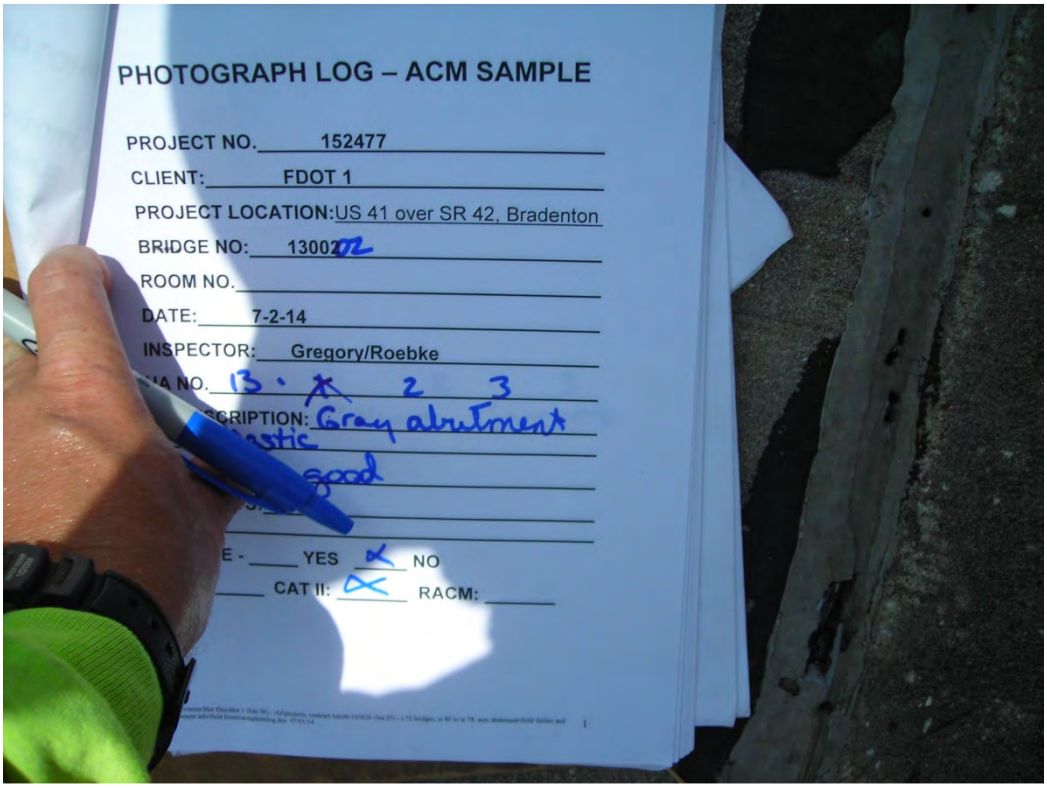


PHOTO 44 – 07/02/14 – SAMPLE 13.2 – HA 13
GRAY MASTIC
ABUTMENT

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

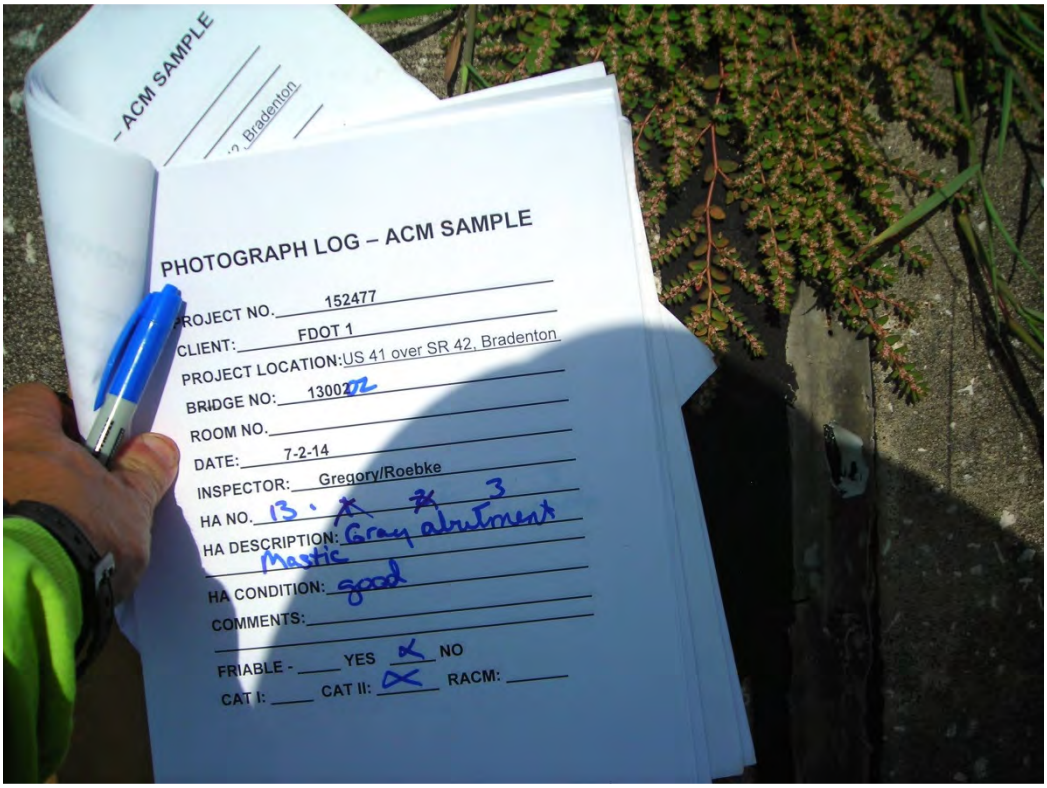


PHOTO 45 – 07/02/14 – SAMPLE 13.3 – HA 13
GRAY MASTIC
ABUTMENT

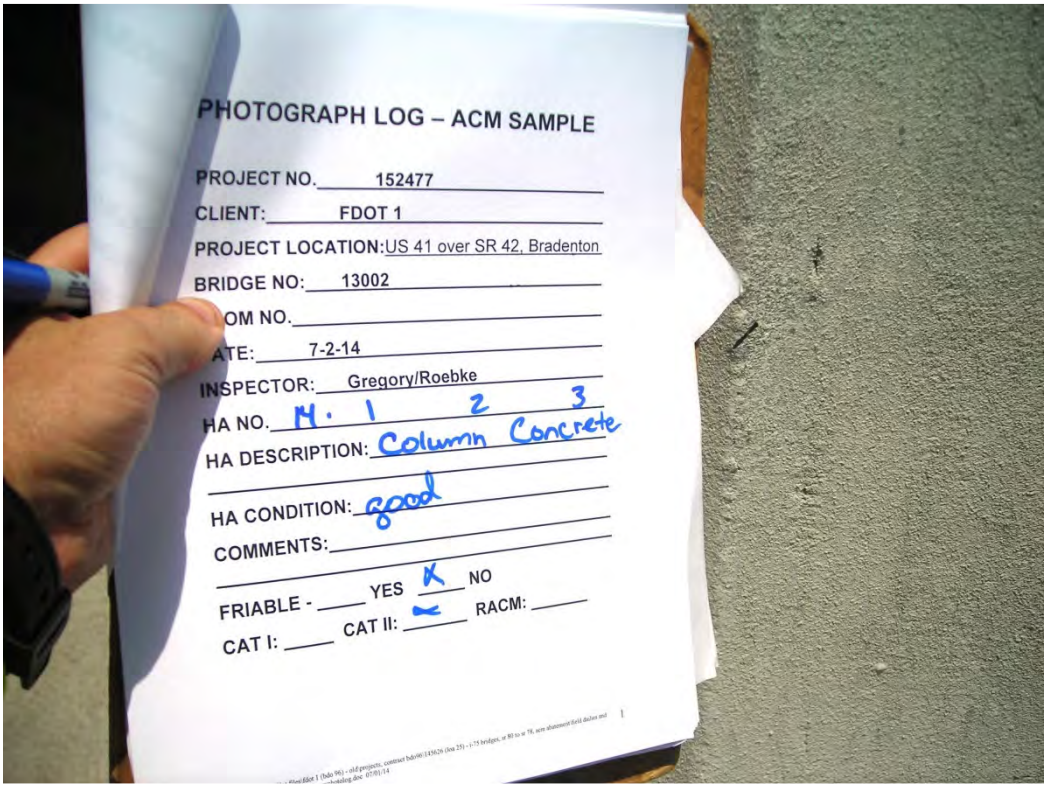


PHOTO 46 – 07/02/14 – SAMPLE 14.1 – HA 14
CONCRETE
COLUMNS

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

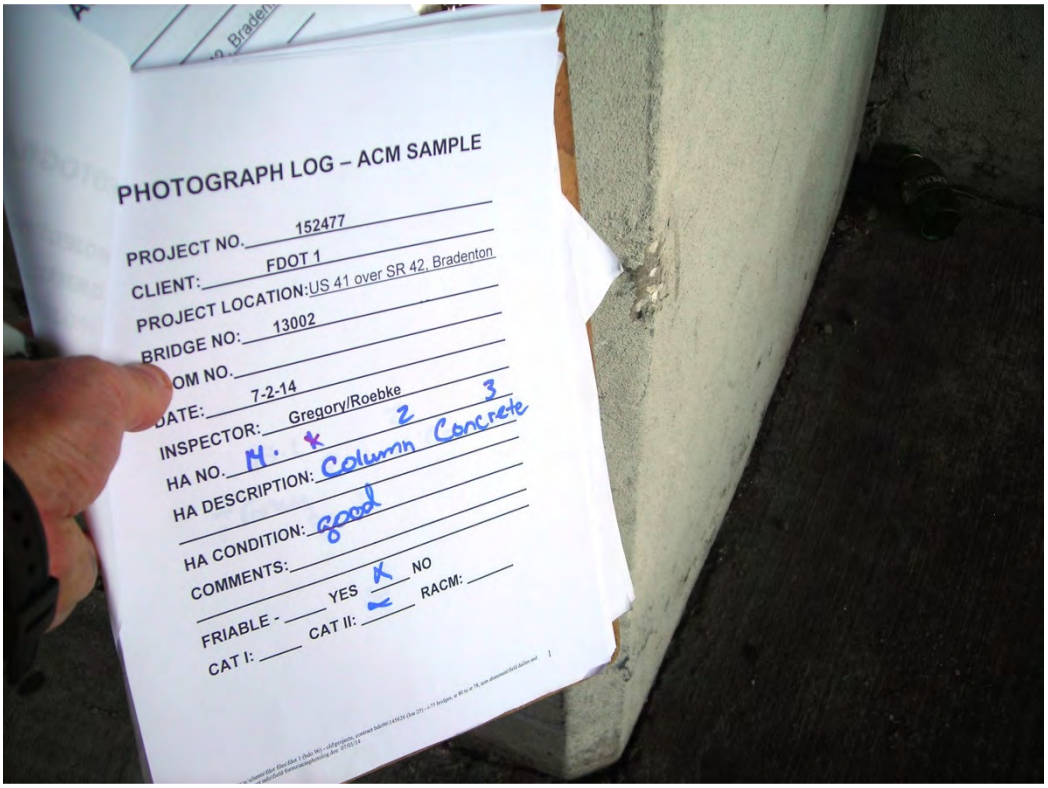


PHOTO 47 – 07/02/14 – SAMPLE 14.2 – HA 14
CONCRETE
COLUMNS

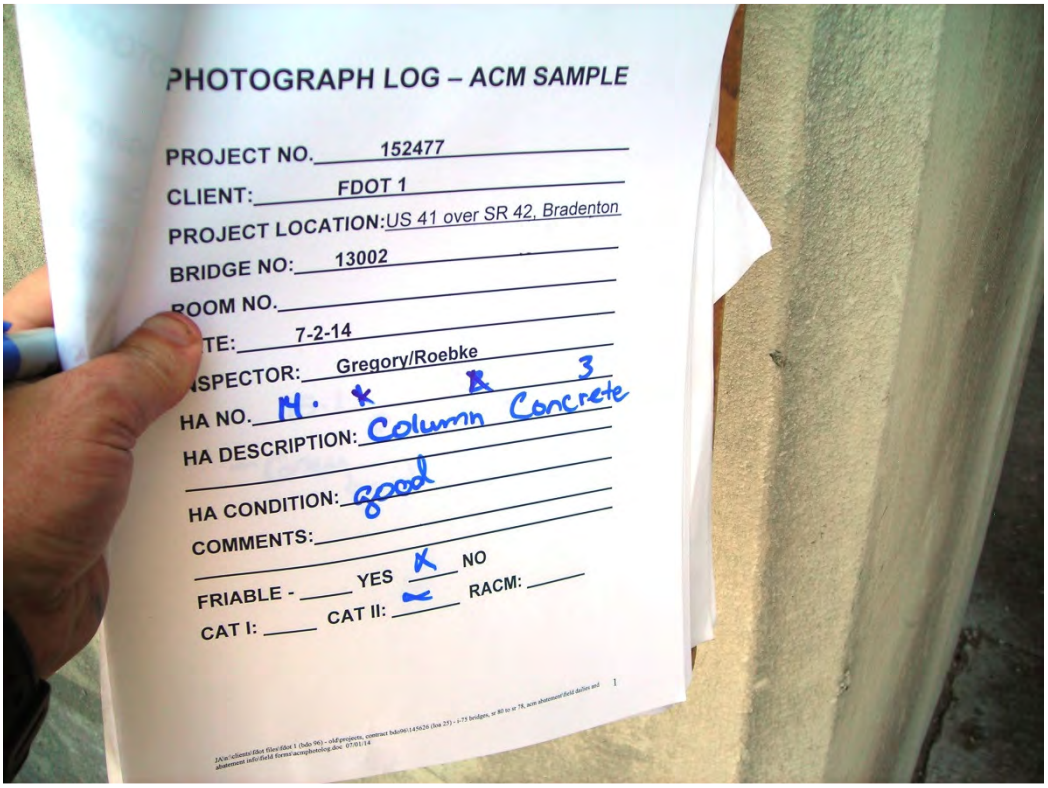


PHOTO 48 – 07/02/14 – SAMPLE 14.3 – HA 14
CONCRETE
COLUMNS

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG

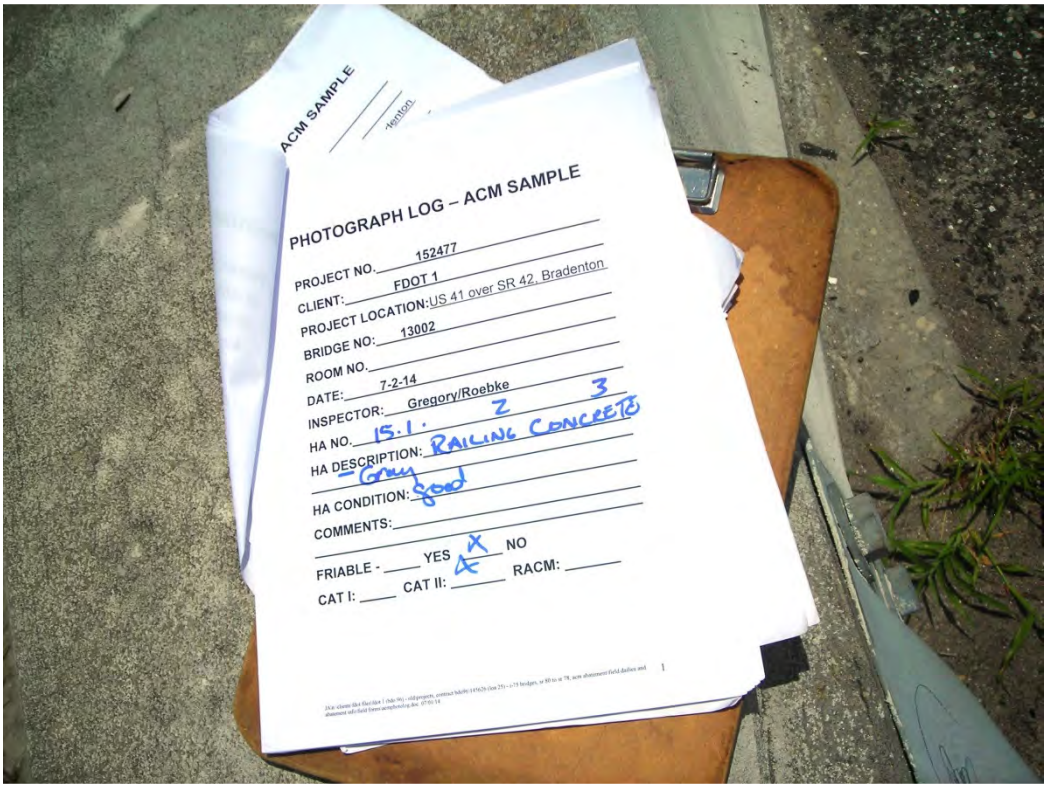


PHOTO 49 – 07/02/14 – SAMPLE 15.1 – HA 15
CONCRETE
RAILING

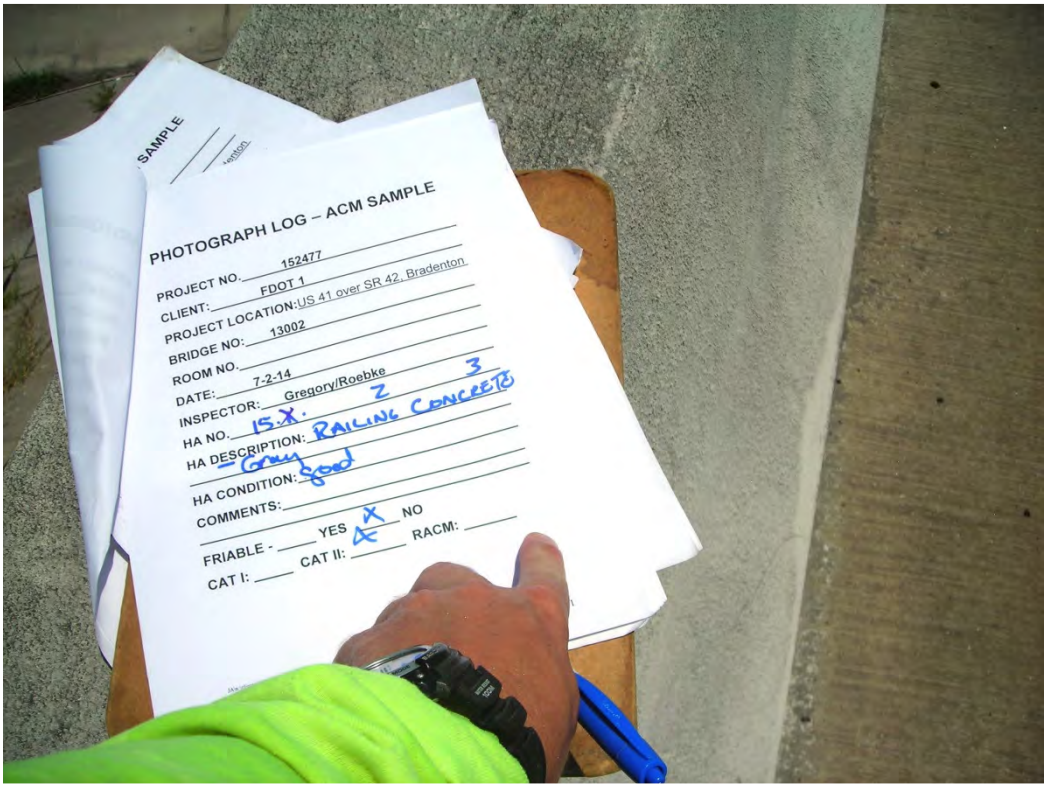


PHOTO 50 – 07/02/14 – SAMPLE 15.2 – HA 15
CONCRETE
RAILING

BRIDGE 130002
ASBESTOS SURVEY PHOTO LOG



PHOTO 51 – 07/02/14 – 15.3 – HA 15
CONCRETE
RAILING

SECTION 4

LABORATORY ANALYTICAL DATA AND CHAIN OF CUSTODY FORM(S)

EMSL Analytical, Inc.
5125 Adanson Street, Suite 900, Orlando, FL 32804
Phone/Fax: (407) 599-5887 / (407) 599-9063
http://www.EMSL.com orlandolab@emsl.com

EMSL Order:	341405694
CustomerID:	SHAW77C
CustomerPO:	
ProjectID:	

Attn: **Thomas Gregory**
Shaw/CB&I
1228 Winter Garden Vineland Rd
Winter Garden, FL 34787

Phone:	(407) 287-3200
Fax:	
Received:	07/02/14 5:05 PM
Analysis Date:	7/15/2014
Collected:	7/2/2014

Project: **152477**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
1.1 *341405694-0001*	Abutment - Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
1.2 *341405694-0002*	Abutment - Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
1.3 *341405694-0003*	Abutment - Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
2.1 *341405694-0004*	Guard Wall - Gray Concrete	Gray/White Non-Fibrous Heterogeneous		45% Quartz 10% Ca Carbonate 45% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		
2.2 *341405694-0005*	Guard Wall - Gray Concrete	Gray/White Non-Fibrous Heterogeneous		45% Quartz 10% Ca Carbonate 45% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		
2.3 *341405694-0006*	Guard Wall - Gray Concrete	Gray/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		
3.1 *341405694-0007*	Guard Wall - Black Felt	Brown/Black Fibrous Homogeneous	60% Cellulose	40% Non-fibrous (other)	**None Detected**

Analyst(s)

Katelyn Wright (15)
Manolo Hernandez (30)

Jonathan Teda, Asbestos Lab Manager
or other approved signatory

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Samples analyzed by EMSL Analytical, Inc. Orlando, FL NVLAP Lab Code 101151-0

Initial report from 07/17/2014 08:33:30

EMSL Analytical, Inc.
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Phone/Fax: (407) 599-5887 / (407) 599-9063
http://www.EMSL.com orlandolab@emsl.com

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ProjectID:	

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Winter Garden, FL 34787

Phone:	(407) 287-3200
Fax:	
Received:	07/02/14 5:05 PM
Analysis Date:	7/15/2014
Collected:	7/2/2014

Project: **152477**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
3.2 *341405694-0008*	Guard Wall - Black Felt	Brown/Black Fibrous Homogeneous	60% Cellulose	40% Non-fibrous (other)	**None Detected**
3.3 *341405694-0009*	Guard Wall - Black Felt	Black Fibrous Homogeneous	55% Cellulose	45% Non-fibrous (other)	**None Detected**
4.1 *341405694-0010*	Abutment - Gray Concrete	Gray/Tan/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
		Inseparable paint / coating layer included in analysis			
4.2 *341405694-0011*	Abutment - Gray Concrete	Gray/Tan/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
		Inseparable paint / coating layer included in analysis			
4.3 *341405694-0012*	Abutment - Gray Concrete	Gray/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
5.1 *341405694-0013*	Bearing Pads - Black Rubber	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
5.2 *341405694-0014*	Bearing Pads - Black Rubber	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**

Analyst(s)

Katelyn Wright (15)
Manolo Hernandez (30)

Jonathan Teda, Asbestos Lab Manager
or other approved signatory

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Analysis Date:	7/15/2014
Collected:	7/2/2014

Project: **152477**

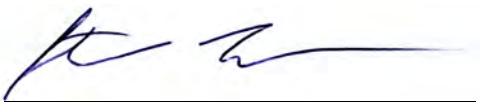
Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
5.3 *341405694-0015*	Bearing Pads - Black Rubber	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
6.1 *341405694-0016*	Gray Grout - Abutment - Gray Grout	Gray Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
6.2 *341405694-0017*	Gray Grout - Abutment - Gray Grout	Gray Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
6.3 *341405694-0018*	Gray Grout - Abutment - Gray Grout	Gray Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
7.1 *341405694-0019*	Bridge Deck/Beams - Gray Concrete	Gray/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
7.2 *341405694-0020*	Bridge Deck/Beams - Gray Concrete	Gray/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
7.3 *341405694-0021*	Bridge Deck/Beams - Gray Concrete	Gray/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**

Inseparable paint / coating layer included in analysis

Analyst(s)

Katelyn Wright (15)
Manolo Hernandez (30)



Jonathan Teda, Asbestos Lab Manager
or other approved signatory

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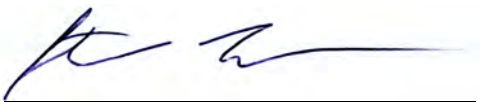
Project: **152477**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos % Fibrous	Non-Asbestos % Non-Fibrous	Asbestos % Type
8.1 *341405694-0022*	Expansion Joint - Black Mastic	Gray/Black Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
		Inseparable paint / coating layer included in analysis			
8.2 *341405694-0023*	Expansion Joint - Black Mastic	Gray/Black Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
		Inseparable paint / coating layer included in analysis			
8.3 *341405694-0024*	Expansion Joint - Black Mastic	Gray/White Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
		Inseparable paint / coating layer included in analysis			
9.1 *341405694-0025*	Deck Reflectors - Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
9.2 *341405694-0026*	Deck Reflectors - Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
9.3 *341405694-0027*	Deck Reflectors - Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**
10.1 *341405694-0028*	Median Reflectors - Gray Mastic	Gray Non-Fibrous Homogeneous		98% Non-fibrous (other)	**2% Chrysotile**
10.2 *341405694-0029*	Median Reflectors - Gray Mastic	Gray Non-Fibrous Homogeneous		98% Non-fibrous (other)	**2% Chrysotile**

Analyst(s)

Katelyn Wright (15)
Manolo Hernandez (30)



Jonathan Teda, Asbestos Lab Manager
or other approved signatory

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Samples analyzed by EMSL Analytical, Inc. Orlando, FL NVLAP Lab Code 101151-0

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EMSL Order:	341405694
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Attn: **Thomas Gregory**
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Winter Garden, FL 34787

Phone:	(407) 287-3200
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Received:	07/02/14 5:05 PM
Analysis Date:	7/15/2014
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Project: **152477**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
10.3 *341405694-0030*	Median Reflectors - Gray Mastic	Gray Non-Fibrous Heterogeneous		98% Non-fibrous (other)	**2% Chrysotile**
			Inseparable paint / coating layer included in analysis		
11.1 *341405694-0031*	Median - Gray Concrete	Gray Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
11.2 *341405694-0032*	Median - Gray Concrete	Gray Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
11.3 *341405694-0033*	Median - Gray Concrete	Gray Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
12.1 *341405694-0034*	Beams Rail & Columns - Class V Coating	Gray Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
12.2 *341405694-0035*	Beams Rail & Columns - Class V Coating	Gray Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
12.3 *341405694-0036*	Beams Rail & Columns - Class V Coating	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	**None Detected**

Analyst(s)

Katelyn Wright (15)
Manolo Hernandez (30)

Jonathan Teda, Asbestos Lab Manager
or other approved signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by EMSL Analytical, Inc. Orlando, FL NVLAP Lab Code 101151-0

Initial report from 07/17/2014 08:33:30

EMSL Analytical, Inc.
5125 Adanson Street, Suite 900, Orlando, FL 32804
Phone/Fax: (407) 599-5887 / (407) 599-9063
http://www.EMSL.com orlandolab@emsl.com

EMSL Order:	341405694
CustomerID:	SHAW77C
CustomerPO:	
ProjectID:	

Attn: **Thomas Gregory**
Shaw/CB&I
1228 Winter Garden Vineland Rd
Winter Garden, FL 34787

Phone:	(407) 287-3200
Fax:	
Received:	07/02/14 5:05 PM
Analysis Date:	7/15/2014
Collected:	7/2/2014

Project: **152477**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos % Fibrous	Non-Asbestos % Non-Fibrous	Asbestos % Type
13.1 *341405694-0037*	Abutment - Gray Mastic	Gray/Black Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		
13.2 *341405694-0038*	Abutment - Gray Mastic	Gray/Black Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		
13.3 *341405694-0039*	Abutment - Gray Mastic	Gray/Black Non-Fibrous Heterogeneous		100% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		
14.1 *341405694-0040*	Columns - Gray Concrete	Gray/White Non-Fibrous Heterogeneous		45% Quartz 10% Ca Carbonate 45% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		
14.2 *341405694-0041*	Columns - Gray Concrete	Gray/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		
14.3 *341405694-0042*	Columns - Gray Concrete	Gray/White Non-Fibrous Heterogeneous		45% Quartz 10% Ca Carbonate 45% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		

Analyst(s)

Katelyn Wright (15)
Manolo Hernandez (30)

Jonathan Teda, Asbestos Lab Manager
or other approved signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by EMSL Analytical, Inc. Orlando, FL NVLAP Lab Code 101151-0

Initial report from 07/17/2014 08:33:30

EMSL Analytical, Inc.
5125 Adanson Street, Suite 900, Orlando, FL 32804
Phone/Fax: (407) 599-5887 / (407) 599-9063
http://www.EMSL.com orlandolab@emsl.com

EMSL Order:	341405694
CustomerID:	SHAW77C
CustomerPO:	
ProjectID:	

Attn: **Thomas Gregory**
Shaw/CB&I
1228 Winter Garden Vineland Rd
Winter Garden, FL 34787

Phone:	(407) 287-3200
Fax:	
Received:	07/02/14 5:05 PM
Analysis Date:	7/15/2014
Collected:	7/2/2014

Project: **152477**

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
15.1 *341405694-0043*	Railing - Gray Concrete	Gray/Tan/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		
15.2 *341405694-0044*	Railing - Gray Concrete	Gray/Tan/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		
15.3 *341405694-0045*	Railing - Gray Concrete	Gray/Tan/White Non-Fibrous Heterogeneous		50% Quartz 10% Ca Carbonate 40% Non-fibrous (other)	**None Detected**
			Inseparable paint / coating layer included in analysis		

Analyst(s)

Katelyn Wright (15)
Manolo Hernandez (30)

Jonathan Teda, Asbestos Lab Manager
or other approved signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by EMSL Analytical, Inc. Orlando, FL NVLAP Lab Code 101151-0

Initial report from 07/17/2014 08:33:30

OrderID: 341405694

EMSL ANALYTICAL, INC.
LABORATORY · PRODUCTS · TRAINING

Asbestos Bulk Building Material Chain of Custody

EMSL Order Number *(Lab Use Only)*: 341405694

5125 Adanson Street, Suite

Orlando, FL 32804
PHONE: (407) 599-5887
FAX: (407) 599-9063

Company: Shaw Environmental, Inc., a CB&I Company	**EMSL-Bill to:** ☑ Same ☐ Different If Bill to is Different note instructions in Comments**
Street: 1228 Winter Garden Blvd	*Third Party Billing requires written authorization from third party*
City: Winter Garden **State/Province:** FL	**Zip/Postal Code:** 34787 **Country:** United States
Report To (Name): Thomas Gregory	**Telephone #:** 407-287-3212
Email Address: thomas.gregory@cbi.com	**Fax #:** 407-287-3201 **Purchase Order:**
Project Name/Number: 152477	**Please Provide Results:** ☐ Fax ✓ Email ☐ Mail
U.S. State Samples Taken: FL	**CT Samples:** ☐ Commercial/Taxable ☐ Residential/Tax Exempt

Turnaround Time (TAT) Options* – Please Check

☐ 3 Hour ☐ 6 Hour ☐ 24 Hour ☐ 48 Hour ☐ 72 Hour ☐ 96 Hour ☐ 1 Week ☒ 2 Week

*For TEM Air 3 hr through 6 hr, please call ahead to schedule *There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT You will be asked to sign an authorization form for this service Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

PLM - Bulk (reporting limit)	TEM – Bulk
☒ PLM EPA 600/R-93/116 (<1%)	☐ TEM EPA NOB – EPA 600/R-93/116 Section 2.5.5.1
☐ PLM EPA NOB (<1%)	☐ NY ELAP Method 198.4 (TEM)
Point Count ☐ 400 (<0.25%) ☐ 1000 (<0.1%)	☐ Chatfield Protocol (semi-quantitative)
Point Count w/Gravimetric ☐ 400 (<0.25%) ☐ 1000 (<0.1%)	☐ TEM % by Mass – EPA 600/R-93/116 Section 2.5.5.2
☐ NIOSH 9002 (<1%)	☐ TEM Qualitative via Filtration Prep Technique
☐ NY ELAP Method 198.1 (friable in NY)	☐ TEM Qualitative via Drop Mount Prep Technique
☐ NY ELAP Method 198.6 NOB (non-friable-NY)	**Other**
☐ OSHA ID-191 Modified	☐
☐ Standard Addition Method	

☐ Check For Positive Stop – Clearly Identify Homogenous Group **Date Sampled:** 7-2-14

Samplers Name: **Samplers Signature:**

Sample #	HA #	Sample Location	Material Description
1-1	1	Abutment	Black mastic
1-2	1	Abutment	Black mastic
1-3	1	Abutment	Black mastic
2-1	2	Guard wall	Gray Concrete
2-2	2	Guard wall	Gray concrete
2-3	2	Guard wall	Gray concrete
3-1	3	Guard wall	Black felt
3-2	3	Guard wall	Black felt
3-3	3	Guard wall	Black felt
4-1	4	Abutment	Gray Concrete

Client Sample # (s): 1-1 through 15.3 **Total # of Samples:** 45

Relinquished (Client): CBI **Date:** 7-2-14 **Time:** 1705

Received (Lab): Brittani Sabatino **Date:** 7/3/14 **Time:** 8:30am

Comments/Special Instructions:

FILL 2 5:30 PP

OrderID: 341405694

EMSL ANALYTICAL, INC.
LABORATORY · PRODUCTS · TRAINING

Asbestos Bulk Building Material Chain of Custody

EMSL Order Number *(Lab Use Only)*: 341405694

5125 Adanson Street, Suite
Orlando, FL 32804
PHONE. (407) 599-5887
FAX: (407) 599-9063

Additional Pages of the Chain of Custody are only necessary if needed for additional sample information

Sample #	HA #	Sample Location	Material Description
4-2	4	Abutment	Grey concrete
4-3	4	Abutment	Grey concrete
5-1	5	Bearing Pads	Black rubber
5-2	5	Bearing Pads	Black rubber
5-3	5	Bearing Pads	Black Rubber
6-1	6	Gray grout - Abutment	Gray grout
6-2	6	Gray grout - Abutment	Gray grout
6-3	6	Gray grout - Abutment	Gray grout
7-1	7	Bridge Deck/Beams	Gray concrete
7-2	7	Bridge Deck/Beams	Gray concrete
7-3	7	Bridge Deck/Beams	Gray concrete
8-1	8	Expansion joint	Black mastic
8-2	8	Expansion joint	Black mastic
8-3	8	Expansion joint	Black Mastic
9-1	9	Deck reflectors	Black mastic
9-2	9	Deck reflectors	Black mastic
9-3	9	Deck reflectors	Black mastic
10-1	10	Median reflectors	Gray mastic
10-2	10	Median reflectors	Gray mastic
10-3	10	Median reflectors	Gray mastic
11-1	11	Median	Gray concrete
11-2	11	Median	Gray concrete
11-3	11	Median	Gray concrete
12-1	12	Beams rails columns	Class V coating

*Comments/Special Instructions:

OrderID: 341405694

EMSL ANALYTICAL, INC.
LABORATORY · PRODUCTS · TRAINING

5125 Adanson Street, Suite

Orlando, FL 32804
PHONE: (407) 599-5887
FAX: (407) 599-9063

Asbestos Bulk Building Material
Chain of Custody

EMSL Order Number *(Lab Use Only)*: 341405694

Additional Pages of the Chain of Custody ere only necessary if needed for additional sample information

Sample #	HA #	Sample Location	Material Description
12-2	12	Beams, nailer columns	Glass V Coating
12-3	12	Beams, nails & columns	Glass V Coating
13-1	13	Abutment	Gray Mastic
13-2	13	Abutment	Grey Mastic
13-3	13	Abutment	Gray Mastic
14-1	14	Columns	gray concrete
14-2	14	Columns	gray concrete
14-3	14	Columns	gray concrete
15-1	15	Railing	gray concrete
15-2	15	Railing	gray concrete
15-3	15	Railing	gray concrete

*Comments/Special Instructions:

QUALITY ASSURANCE SAMPLING

QA/QC sampling was performed in accordance with the State of Florida Building Asbestos Survey Procedure Manual. Three QA/QC samples (No. 3.4 QA/QC, 8.4 QA/QC, and 12.4 QA/QC) were collected adjacent to samples 3.3, 8.3, and 12.3. Laboratory analyses indicated the sample did not contain asbestos.

IATL **International Asbestos Testing Laboratories**

9000 Commerce Parkway Suite B Mt. Laurel, NJ 08054
Telephone: 856-231-9449 Fax: 856-231-9818

CERTIFICATE OF ANALYSIS

Client: Shaw Environmental Inc(CBI Co)
1228 Winter Garden Vineland Rd
Winter Garden FL 34787

Report Date: 7/16/2014
Report No.: 339364
Project: CBI; Bridge130002,Bradenton
Project No.: 152477

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 5367504 **Description / Location:** Dk Brown Fibrous
Client No.: 3-4

% Asbestos	Type	% Non-Asbestos Fibrous Material	Type	% Non-Fibrous Material
None Detected	None Detected	90	Cellulose	10

Lab No.: 5367505 **Description / Location:** Grey Caulk
Client No.: 8-4

% Asbestos	Type	% Non-Asbestos Fibrous Material	Type	% Non-Fibrous Material
None Detected	None Detected	None Detected	None Detected	100

Lab No.: 5367506 **Description / Location:** Grey Paint
Client No.: 12-4

% Asbestos	Type	% Non-Asbestos Fibrous Material	Type	% Non-Fibrous Material
None Detected	None Detected	None Detected	None Detected	100

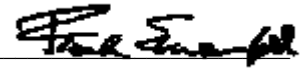
Accreditations: **NIST-NVLAP No. 101165-0** **NY-DOH No. 11021** **AIHA-LAP, LLC No. 100188**

This confidential report relates only to those item(s) tested and does not represent an endorsement by NIST-NVLAP, AIHA or any agency of the U.S. government
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Analytical Method: US EPA 600/R-93/116 by Polarized Light Microscopy, (ELAP 198.1 where applicable)

Comments: Quantification at <0.25% by volume is possible with this method. (PC) Indicates Stratified Point Count Method performed. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed (ex. analyze until positive instructions). Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, PLM is not consistently reliable in detecting asbestos in non-friable organically bound (NOB) materials. Quantitative transmission electron microscopy (TEM) is currently the only method that can pronounce materials as non-asbestos containing.

Analysis Performed By: L. Solebello

Approved By: 

Date: 7/16/2014

Frank E. Ehrenfeld, III
Laboratory Director

iATL INTERNATIONAL
ASBESTOS TESTING LABORATORIES

9000 Commerce Parkway, Suite B • Mount Laurel, NJ 08054
Phone: 877-428-4285/856-231-9449 • Fax: 856-231-9818

Chain of Custody

–Bulk Asbestos –

Contact Information

Client Company:	Shaw Environmental/CB&I	**Project Number:**	152477
Office Address:	1228 Winter Garden Vineland Rd	**Project Name:**	Bridge 130002, Bradenton
City, State, Zip:	Winter Garden, FL 34787	**Primary Contact:**	Shawn Flynn
Fax Number:	407-287-3201	**Office Phone:**	407-287-3210
Email Address:	thomas.gregory@cbi.com	**Cell Phone:**	

PLM Instructions:

- ☒ PLM: Bulk Asbestos Building Materials EPA 600 R-93/116, 1993
- ☐ PLM: Bulk Asbestos Building Materials EPA 600 M-4/82-020, 1982
- ☐ PLM: Bulk Asbestos Building Materials NIOSH 9002, 1985
- ☐ PLM: Bulk Asbestos Building Materials NYSDOH-ELAP 198.1, 2002
- ☐ PLM: Bulk Asbestos Building Materials NYSDOH-ELAP 198.6, 2010
- ☐ TEM: Bulk Asbestos Building Materials NYSDOH-ELAP 198.4, 2009

E-MAILED Joe 7-16

- ☐ PLM: Point Counting
  - ☐ PC: via ELAP 198.1
  - ☐ PC: 400 Points
  - ☐ PC: 800 Points *
  - ☐ PC: 1600 Points *
- ☐ PLM: Instructions for Multi-Layered Samples
  - ☐ Analyze and Report All Separable Layers per EPA 600
  - ☐ Report Composite for Drywall Systems per NESHAP
  - ☐ Report All Layers and Composite Where Applicable
  - ☐ Only Analyze and Report Specifically Noted Layer
- ☐ PLM: Analyze Until Positive (Positive Stop)
  - ☐ AUP: by Homogenous Area as Noted
  - ☐ AUP: by Material Type as Noted
- ☐ PLM: NOB via 198.6
  - ☐ PLM: Friable via EPA 600 2.3
  - ☐ If <1% by PLM, to TEM via 198.4 *
  - ☐ If <1% by PLM, Hold for Instructions
- ☐ PLM: Non-Building Material*,** (Dust, Wipe, Tape)
  - ☐ Soil or Vermiculite Analysis*
  - ☐ CARB 435

Special Instructions: _____

** Additional charge and turnaround may be required* *** Alternative Method (ex: EPA 600/R-04/004) may be recommended by Laboratory*

Turnaround Time

Preliminary Results Requested Date: _____ (Specific date / time) ☐ Verbal ☒ Email ☐ Fax

☒ 10 Day ☐ 5 Day ☐ 3 Day ☐ 2 Day ☐ 1 Day* ☐ 12 Hour** ☐ 6 Hour** ☐ RUSH**

* End of next business day unless otherwise specified. ** Matrix Dependent. ***Please notify the lab before shipping***

Chain of Custody

Relinquished (Name/Organization):	Jes	Date: 7.7.14	Time: 8:30
Received (Name / iATL):		Date:	Time:
Sample Login (Name / iATL):		Date: 7/9/14	Time:
Analysis(Name(s) / iATL):	LS	Date: 7/10/14	Time:
QA/QC Review (Name / iATL):	dbc	Date: 7-16-14	Time:
Archived / Released: _____ QA/QC InterLAB Use: _____		Date:	Time:

RECEIVED JUL - 9 2014 IATL - By

iATL INTERNATIONAL
ASBESTOS TESTING LABORATORIES

9000 Commerce Parkway, Suite B • Mount Laurel, NJ 08054
Phone: 877-428-4285/856-231-9449 • Fax: 856-231-9818

Sample Log

–Bulk Asbestos –

Client: CBRL / Shaw Environmental Project: Bridge 130002, Bradenton

Sampling Date/Time: 7-2-14/ 1300

Bulk Asbestos Sample Log			
Client Sample #	**iATL #**	**Location/Description**	**Notes**
3-4	5367504	Black felt -	
8-4	5367505	Expansion Joint	
12-4	5367506	Class V coating	
		CS 7/16/14	

SECTION 5

CREDENTIALS FOR CONSULTANT, INSPECTOR, AND LABORATORY

STATE OF FLORIDA
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

ASBESTOS LICENSING UNIT
1940 NORTH MONROE STREET
TALLAHASSEE FL 32399-0783

(850) 487-1395

SHAW ENVIRONMENTAL INC
DAVID WARNER MOSHER
4171 ESSEN LANE
BATON ROUGE LA 70809

Congratulations! With this license you become one of the nearly one million Floridians licensed by the Department of Business and Professional Regulation. Our professionals and businesses range from architects to yacht brokers, from boxers to barbeque restaurants, and they keep Florida's economy strong.

Every day we work to improve the way we do business in order to serve you better. For information about our services, please log onto **www.myfloridalicense.com**. There you can find more information about our divisions and the regulations that impact you, subscribe to department newsletters and learn more about the Department's initiatives.

Our mission at the Department is: License Efficiently, Regulate Fairly. We constantly strive to serve you better so that you can serve your customers. Thank you for doing business in Florida, and congratulations on your new license!

STATE OF FLORIDA
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

ZA317 ISSUED: 01/08/2014

ASBESTOS BUSINESS ORGANIZATION
SHAW ENVIRONMENTAL INC
DAVID WARNER MOSHER

IS LICENSED under the provisions of Ch.469 FS.
Expiration date : NOV 30, 2015 L1401080000612

The Department of State is leading the commemoration of Florida's 500th anniversary in 2013. For more information, please go to www.VivaFlorida.org.

DETACH HERE

RICK SCOTT, GOVERNOR

STATE OF FLORIDA
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION
ASBESTOS LICENSING UNIT

KEN LAWSON, SECRETARY

LICENSE NUMBER	
ZA317	

The ASBESTOS BUSINESS ORGANIZATION
Named below IS LICENSED
Under the provisions of Chapter 469 FS.
Expiration date: NOV 30, 2015

SHAW ENVIRONMENTAL INC
DAVID WARNER MOSHER
9143 PHILIPS HIGHWAY
SUITE 400
JACKSONVILLE FL 32256-7460

ISSUED: 01/08/2014 SEQ # L1401080000612
DISPLAY AS REQUIRED BY LAW

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AC# 6471124

STATE OF FLORIDA

DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION
ASBESTOS LICENSING UNIT

SEQ# L12101802669

DATE	BATCH NUMBER	LICENSE NBR
10/18/2012	120176409	EA0000078

The ASBESTOS CONSULTANT - ENGINEER
Named below IS LICENSED
Under the provisions of Chapter 469 FS.
Expiration date: NOV 30, 2014

MOSHER, DAVID WARNER
SHAW ENVIRONMENTAL INC
1233 FRUIT COVE DRIVE SOUTH
JACKSONVILLE FL 32259

RICK SCOTT
GOVERNOR

KEN LAWSON
SECRETARY

DISPLAY AS REQUIRED BY LAW

N:\Clients\FDOT 1 (BDV 75)\PROJECTS\152477 (LOA Z) - Asbestos Survey, SR 555 (US41) over SR42, Bridge 13002, Bredenton\5.0 Report\2014-09 AsbSurvey\152477 ASB SURVEY_Bridge 130002_111214 FINAL.docx

UF | TREEO Center
UNIVERSITY of FLORIDA

Center for Training, Research and Education for Environmental Occupations

certifies

Daniel Richard Roebke

CB&I, 512 Indian Oaks Rd. Winter Garden, FL 34787

has successfully met certificate requirements for the

Asbestos: Inspector

Approval: FBPR Asbestos Licensing Unit: Provider #0000995; Course #FL49-0002859 (3 Days; 21 Contact Hours)
(Accreditation for Inspector Under TSCA Title II/AHERA)

Conducted

06/09/2014 to 06/11/2014

Certificate #: 140627-4599
CEUs: 2.1
EPA accreditation expires: 06/11/2015
Principal Instructor: Russell Stauffer, PE
FBPE PDHs: 0009087/Educational Institutions: 21.0

Carol Hinton

Carol Hinton, Associate Director

University of Florida TREEO Center • 3900 SW 63 Boulevard • Gainesville, FL 32608-3800 • 352-392-9570 • www.treeo.ufl.edu

N:\Clients\FDOT FILES\FDOT 1 (BDV 75)\PROJECTS\152477 (LOA Z) - Asbestos Survey, SR 555 (US414) over SR42, Bridge 13002, Bredenton\5.0 Report\2014-09 AsbSurvey\152477 ASB SURVEY_Bridge 130002_111214 FINAL.docx

UF | TREEO Center
UNIVERSITY of FLORIDA

Center for Training, Research and Education for Environmental Occupations

certifies

Thomas Lee Gregory

CB&I, 333 Charlotte St. , Winter Garden, FL 34787

Having passed a 25-question exam with a score of 70% or higher has successfully met training requirements for

Asbestos Refresher: Inspector

FDBPR Asbestos Licensing Unit: Provider #0000995; Course #FL49-0004731 (½ Day; 3.40 Contact Hours)

(Reaccreditation for Inspector under TSCA Title II/AHERA)

Conducted

11/06/2013

Certificate #: 140134-4294
Exam Date: 11/06/2013
EPA accreditation expires: 11/06/2014
Principal Instructor: Brian Duchene, PE
CEUs: .4
FBPR LAC: #0000995; Course #0004731
FBPE PDHs: #0004021; Course #0009083/Educational Institutions: 4 PDHs

Carol Hinton

Carol Hinton, Associate Director

University of Florida TREEO Center • 3900 SW 63 Boulevard • Gainesville, FL 32608-3800 • 352-392-9570 • www.treeo.ufl.edu

United States Department of Commerce
National Institute of Standards and Technology

Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 101151-0

EMSL Analytical, Inc.

Orlando, FL

is accredited by the National Voluntary Laboratory Accreditation Program for specific services, listed on the Scope of Accreditation, for:

BULK ASBESTOS FIBER ANALYSIS

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).

2014-07-01 through 2015-06-30

Effective dates

For the National Institute of Standards and Technology

NVLAP-01C (REV. 2009-01-28)

N:\Clients\FDOT 1 (BDV 75)\PROJECTS\152477 (LOA Z) - Asbestos Survey, SR 555 (US41) over SR42, Bridge 13002, Bredenton\5.0 Report\2014-09 AsbSurvey\152477 ASB SURVEY_Bridge 130002_111214 FINAL.docx

NVLAP® National Voluntary Laboratory Accreditation Program

SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

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BULK ASBESTOS FIBER ANALYSIS (PLM) **NVLAP LAB CODE 101151-0**

NVLAP Code	*Designation / Description*
18/A01	EPA 600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples
18/A03	EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

2014-07-01 through 2015-06-30
Effective dates

For the National Institute of Standards and Technology

NVLAP-01S (REV. 2005-05-19)

United States Department of Commerce
National Institute of Standards and Technology

NVLAP®

Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 101165-0

International Asbestos Testing Laboratories

Mt. Laurel, NJ

is accredited by the National Voluntary Laboratory Accreditation Program for specific services, listed on the Scope of Accreditation, for:

BULK ASBESTOS FIBER ANALYSIS

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).

2014-07-01 through 2015-06-30
Effective dates

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NVLAP-01C (REV. 2009-01-28)

NVLAP® National Voluntary Laboratory Accreditation Program

SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

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SECTION 6

ASBESTOS OPERATIONS AND MAINTENANCE (O&M) PLAN AND RESPONSE ACTION

O&M PLAN AND RESPONSE ACTION
FOR
BRIDGE NO. 130002
SR 55 (US 41) OVER SR 43 (US 301)
MANATEE COUNTY FLORIDA
DURING CONSTRUCTION ACTIVITIES

Any regulated asbestos containing material (RACM) must be abated in accordance with 40 CFR, Subpart M, Part 61.145, as stated in abatement specifications required by Chapter 255, FS and OSHA Standard 1926.58 for the construction industry, prior to demolition or renovation. RACM is identified as follows:

- Friable ACM
- Category I nonfriable ACM that has become friable
- Category I nonfriable ACM that will be or has been subject to sanding, grinding, cutting, or abrading
- Category II nonfriable ACM that has a high probability of becoming, or has become, crumbled, pulverized, or reduced to powder by the forces expected to act on such material

1. Introduction

1.1 This plan is an abbreviated description of task requirements prepared for the removal of ACM from Bridge 130002, SR 55 (US 41) over SR 43 (US 301) , located in Manatee County Florida.

1.2 Financial Management No. 435106-1-52-01, Letter of Authorization Z .

1.3 All work shall be performed in strict compliance with all federal, state, and local regulations and ordinances, and in a manner which conforms to the intent of all health and safety laws.

1.4 All work must comply with abatement procedures described in Master Specifications for Asbestos Abatement developed for the State of Florida, Department of Transportation District 1, and to sections applicable to the scope of work (SOW), which are to be used as the primary requirements in conjunction with the Work Plan.

2. Scope of Work

2.1 A brief description of the work is as follows:

Bridge 130002 – Removal of reflectors adhered with asbestos-containing gray mastic along the concrete median of SR 55 (US 41). Exterior isolation criteria will be required during the work.

3. General Requirements

3.1 Existing conditions are reflected correctly to the best of the Department's Representative's knowledge.
3.2 In the event that conditions are encountered in the field that was not identified in the Work Plan, the Department's Representative shall be notified immediately.
3.3 Modifications to the Work Plan can be made in writing by the Department's Representative.
3.4 If the Contractor proceeds without written notification from the Department's Representative, the Contractor shall be solely and completely responsible for those efforts.

4. Project Coordination

4.1 The project will be coordinated with the Department's Certification Compliance Administrator in conjunction with the Department's Representative. The Contractor shall perform no work unless approval by the Department or the Department's Representative has been received. Under no circumstances shall a Contractor disrupt the daily activities of any facility/bridge without the prior approval of the Department.
4.2 The Contractor shall make all necessary provisions for power, water, etc., and shall provide said utilities to the Department's Representative.
4.3 The Contractor shall not perform any work in the absence of the Department's Representative, who shall decide, in absolute discretion, as to the meaning and applicability of any part of the Work Plan and/or Master Specifications for the Asbestos Abatement.
4.4 All project related documentation including Pre-job Submittals, Project Quotes, FDEP Notifications, Post-Job Submittals, application for final payment, etc., shall include the FDOT Financial Management Number as specified in Section 1.2 of this Work Plan.
4.5 Prior to commencement of work, the Contractor shall submit one copy of the required information, as per Section 1 of the Master Specifications to the Department Representative. No work will be allowed to commence without the required submittals.
4.6 Notifications for abatement or demolition shall be sent to the proper authorities via certified mail – return receipt requested. A copy of the signed return receipt shall be included as part of the project file.

5. Asbestos Abatement Requirements

5.1 Personnel and Respiratory Protection. During isolation and preparation of the Work Area(s), a half-face negative pressure air-purifying respirator (APR) shall be the minimum required protection. Additional respiratory protection during abatement activities may be required as determined by the Department's Representative.
5.2 Personal Protection Equipment (PPE). PPE shall consist of hoods, gloves, boots, and disposable coveralls during all isolation, preparation, and abatement activities.
5.3 All abatement methods shall conform to the requirements as specified in the Work Plan and the Master Specifications.
5.4 No asbestos abatement activities shall be performed without prior approval of the Department's Representative.

6. Air Sampling Protocol

The following air sampling strategy shall be complied with during the project delineated in the SOW of this Work Plan.

6.1 Air sampling protocol before, during, and after the removal of all asbestos work areas shall include pre-abatement air sampling (as determined by the Department's Representative), post-abatement air sampling (in those areas subject to negative pressure during removal for clearance sampling), and daily air samples. All air samples shall be analyzed using phase contrast microscopy (PCM) in accordance with the NIOSH 7400 Analytical Method. All air pumps shall be fitted with 24-mm ester cellulose filter cassettes.

6.2 Personnel air monitoring: A minimum of three personnel air samples shall be collected for the purposes of determining time weighted averages (TWA) and excursion limit (EL). Personnel air samples shall be collected from the breathing zone of a minimum of 25 percent of the abatement workers performing asbestos removal activities. Personnel samples are the responsibility of the Contractor and will not be supplied by the Department's Representative as a means of meeting OSHA requirements.

7. Disposal of Asbestos-Containing Material Waste

7.1 Disposal of ACM waste shall be in strict compliance with Section 13 of the Master Specifications. All material shall be placed in a closed-top push cart, or equal, before being taken outside the Work Area. In no case shall asbestos waste containers be carried unprotected from the Work Area where the distance to the dumpster or transport is more than a 50-foot distance.

8. Post-Job Submittals

8.1 After successful completion of the project, submit one copy of the required documentation, as per applicable Sections of the Master Specifications, to the Department's Representative. Final payment to the Contractor will not be made until the required Post-Job Submittals have been received and approved by the Department's Representative. All submittals must be received by the Department's Representative within 10 calendar days of the project completion.

End of Work Plan

DISCLAIMER

The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, expressed or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

This report is the result of a limited investigation of the referenced structure, and every attempt has been made to discover and inventory all asbestos-containing building materials (ACBM) in the structure. However, due to the limited and nondestructive nature of the inspection, it is possible that other concealed and inaccessible suspect materials may exist. Should any additional suspect ACMs that are not listed in this report be uncovered during renovation or demolition, then those materials should be sampled and submitted for analysis.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, nor the use of segregated portions of this report.