



**Groundwater
& Environmental Services, Inc.**

2840 Scherer Drive • Suite 430 • St. Petersburg, Florida 33716 • (866) 232-0472 • Fax (727) 209-1563

March 31, 2011


Mr. Greg Stonebreaker
Siesta 41 Associates LLP
8441 Cooper Creek Boulevard
University Park, FL 34239

Subject: Site Rehabilitation Completion Order
Former Sunstate Shell SAP# 136776
6494 South Tamiami Trail
Sarasota, Sarasota County, Florida
FDEP ID No. 58/8520798
Discharge Date: March 29, 2004

Dear Mr. Stonebreaker:

Groundwater & Environmental Services, Inc. (GES) has received a Site Rehabilitation Completion Order (SRCO) for the March 29, 2004 discharge reported for the subject Property. Motiva Enterprises, LLC (Motiva) has fulfilled its obligations to remediate the property, and no further environmental work will be conducted by Motiva with the exception of the upcoming well abandonment activities. Attached for your reference, please find a copy of the SRCO. Should you have any questions or require any additional information, please contact us at (866) 232-0742 x3583.

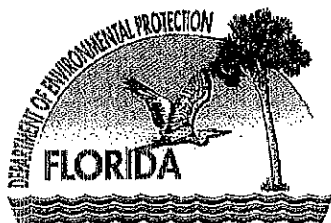
Sincerely,
Groundwater & Environmental Services, Inc.


Brenda Anderson
Environmental Scientist


Marilyn Hadidian, PG
Project Manager

cc: Ms. Annette Dokken, Shell Oil Products, US (via LiveLink)
Mr. Ivan Lozina, Siesta 41 Associates LLP, 8441 Cooper Creek Boulevard, University Park, FL 34239

266151



Florida Department of Environmental Protection

Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

March 21, 2011

Ms. Annette Dokken
Shell Oil Products US
7765 Lake Worth Road, No. 319
Lake Worth, FL 33467

Subject: Site Rehabilitation Completion Order (SRCO)
Former South Key Shell
6494 South Tamiami Trail
Sarasota, Sarasota County, Florida
FDEP Site # COM_240863/FDEP Project # 283548

Dear Ms. Dokken:

The Southwest District has reviewed the Supplemental Site Assessment Report Addendum/No Further Action (NFA) Proposal, dated August 16, 2010 that was prepared by Groundwater & Environmental Services, Inc. (GES) for the Former South Key Shell site located at 6494 South Tamiami Trail, Sarasota, Sarasota County, Florida. Maps showing the location of the South Key Shell and the former location of the "contaminated site" (i.e., contaminant plume) for which this Order is being issued are attached as Exhibits 1 and 2 and are incorporated by reference herein.

The contamination, which resulted from a discharge that was discovered on March 29, 2004, consisted of tetrachloroethene. The discharge was discovered during an internal sampling event. It should be noted that this SRCO only addresses the tetrachloroethene contamination at the site for which Chapter 62-780, Florida Administrative Code (F.A.C.) applies. The NFA Proposal is supported by earlier submittals, prepared pursuant to the requirements of Chapter 62-780, F.A.C., including, but not limited to:

Contamination Assessment Plan, dated February 28, 2005, prepared by Envirotrac.

Contaminations Assessment Plan Addendum, dated December 21, 2005, prepared by Envirotrac.

Site Assessment Report – Solvent Contamination, dated March 17, 2006, prepared by Envirotrac.

Supplemental Site Assessment Report, dated January 14, 2009, prepared by GES.

Supplement Site Assessment Report Addendum/No Further Action Proposal, dated August 16, 2010, prepared by GES.

Based on the documentation submitted with the NFA Proposal and the above-referenced documents, the Department has reasonable assurance that Shell Oil Products US has met the criteria in Chapter 62-780, F.A.C. The submittals indicate that soil and groundwater contaminant concentrations are below the applicable Soil Cleanup Target Levels and Maximum Concentration Limits or Groundwater Cleanup Target Levels as adopted in Chapter 62-777, F.A.C. (Effective date *April 17, 2005*.) Therefore, you have satisfied the site rehabilitation requirements for the above-referenced contaminated site and are released from any further obligation to conduct site rehabilitation under Chapter 62-780, F.A.C., at the contaminated site, except as set forth below. See attached table (Exhibit 3), incorporated by reference herein, which includes information regarding the contaminants, affected media, and applicable cleanup target levels for the contaminated site that is the subject of this Order.

Failure to meet the following requirement(s) will result in the revocation of this Order:

- (a) You are required to properly abandon all monitoring wells within 60 days of receipt of the final Order. The monitoring wells must be plugged and abandoned in accordance with the requirements of Rule 62-532.500(4), F.A.C.

Further, in accordance with Chapter 376.30701(4), Florida Statutes (F.S.), upon completion of site rehabilitation, additional site rehabilitation is not required unless it is demonstrated that:

- (a) Fraud was committed in demonstrating site conditions or completion of site rehabilitation;
- (b) New information confirms the existence of an area of previously unknown contamination which exceeds the site-specific rehabilitation levels established in accordance with Section 376.30701(2), F.S., or which otherwise poses the threat of real and substantial harm to public health, safety, or the environment;
- (c) A new discharge of pollutants or hazardous substances occurs at the site subsequent to the issuance of this Order.

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, 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 this SRCO, you do not have to do anything. This Order is final and effective on the date filed with the Clerk of the Department, which is indicated on the last 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 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 hearing; or

2. File a petition for 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 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 Shell Oil Products US, shall mail a copy of the request to Shell Oil Products US 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 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, MS 35, Tallahassee, Florida, 32399-3000, within **21** days of receipt of this Order. Petitioner, if different from Shell Oil Products US, shall mail a copy of the petition to Shell Oil Products US 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 administrative hearing shall contain the following information:

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- 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 DEP 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 disputed issues of material fact, 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; 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 on the date filed with the Clerk of the Department, which is indicated on the last 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

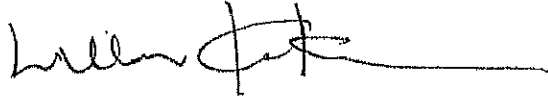
Any party to this Order has the right to seek judicial review of it under section 120.68, F.S., by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the Agency Clerk of the Department in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, 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 thirty days after this order is filed with the clerk of the Department (see below).

Questions

Any questions regarding the Department's review of your NFA Proposal should be directed to Steven Tafuni at 13051 North Telecom Parkway, Temple Terrace, Florida, 33637, or by email at steven.tafuni@dep.state.fl.us. 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.

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Sincerely,



→ Pamala Vazquez
Program Administrator
Southwest 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.


Agathia Williams 3/21/11
Clerk Date
(Or Deputy Clerk)

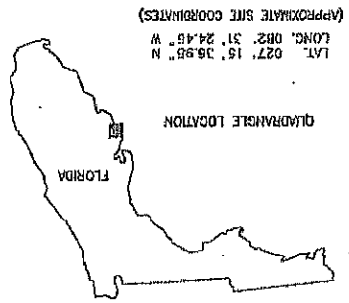
Enclosures:

- Exhibit 1 – Site Location Map
- Exhibit 2 - Groundwater Monitoring Well Map
- Exhibit 3 – Soil and Groundwater Data Tables

cc: Brenda Anderson, GES

EXHIBIT 1

FIGURE 1	DATE 12-12-08	SCALE IN FEET 0 2000	 NORTH
Groundwater & Environmental Services, Inc. 2840 SCHERER DR., SUITE 430, ST. PETERSBURG, FLORIDA			
SHELL OIL PRODUCTS, US SHELL STATION #196776 6494 SOUTH TAMMAM TRAIL SARASOTA, FLORIDA			DRAFTED BY W.A.W. (N.M.)
SITE LOCATION MAP			CHECKED BY
			REVISIONS BY



SOURCE: USGS 7.5 MINUTE SERIES
 TOPOGRAPHIC QUADRANGLE 1992
 SARASOTA, FLORIDA
 CONTOUR INTERVAL = 5'



EXHIBIT 2

EXHIBIT 3

TABLE 1: SOIL ANALYTICAL SUMMARY

Facility Name: Former Shell Sunstate (SAP #136776)
 Facility Address: 6494 South Tamiami Trail, Sarasota
 FDEP Facility ID: 588520798

Soil Sample	Sample				Net OVA Headnet (ppm)	Laboratory Analytes								
	Date Collected	Depth to Water (ft)	Sample Interval (ft)	GRA#		Benzene	Ethylbenzene	Toluene	Total Xylenes	Total BTEX	MTBE	Naphthalene	Tetrachloroethene (PCE)	Trichloroethene (TCE)
SCTL - Leachability (SW Criteria)						0.007	0.6	0.5	0.1	-	0.09	7.2	0.03	0.03
SCTL - Diesel Exposure (Residential)						1.3	1500	2500	100	-	4,100	55	8.8	6.6
SCTL - Diesel Exposure (Commercial)						1.7	2,200	40,000	200	-	24,000	200	10	9.3
SB-1	09/15/01	7.75'	6.5'	<10	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
PHEDURN	09/15/01	NM	(GRA#)	NM	<0.001	NM	NM	NM	NM	NM	NM	NM	NM	
SB-2	06/23/01	7.0'	5'	<10	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
SB-3	06/23/01	7.0'	4'	<10	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
SB-4	01/17/2006	9.0'	4'	<10	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
DW-3	01/17/2006	10.0'	4'	<10	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
SB-1 @ 3'	12/12/2008	6'	3'	18	0.00010 U	0.000219 U	0.000209 U	0.000273 U	0.001451 U	0.000122 U	0.00210 U	0.000345 U	0.000184 U	
SB-2 @ 3'	12/12/2008	6'	3'	16	0.000203 U	0.000222 U	0.000314 U	0.000234 U	0.001473 U	0.000124 U	0.00211 U	0.000359 U	0.000189 U	
SB-3 @ 3'	12/12/2008	6'	3'	20	0.000202 U	0.000221 U	0.000312 U	0.000231 U	0.001466 U	0.000123 U	0.00212 U	0.000349 U	0.000188 U	
SB-4 @ 3'	12/12/2008	6'	3'	4	0.000207 U	0.000227 U	0.000310 U	0.000230 U	0.001470 U	0.000123 U	0.00212 U	0.000357 U	0.000193 U	
SB-5 @ 3'	12/12/2008	6'	3'	4	0.000181 U	0.000198 U	0.000280 U	0.000255 U	0.001314 U	0.000111 U	0.00199 U	0.000312 U	0.000169 U	
SB-6 @ 3'	12/12/2008	6'	3'	5	0.000219 U	0.000233 U	0.000315 U	0.000291 U	0.001308 U	0.000152 U	0.00202 U	0.000340 U	0.000232 U	
SB-7 @ 2'	6/24/2010	-6'	2'	<1	0.0002 U	0.0002 U	0.0003 U	0.0007 U	0.0014 U	0.0001 U	0.0019 U	0.0003 U	0.0002 U	
SB-7 @ 4'	6/24/2010	-6'	4'	<1	0.0003 U	0.0003 U	0.0004 U	0.0011 U	0.0021 U	0.0002 U	0.0030 U	0.0005 U	0.0003 U	
SB-7 @ 6'	6/24/2010	-6'	6'	<1	0.0002 U	0.0003 U	0.0004 U	0.0009 U	0.0019 U	0.0002 U	0.0026 U	0.0004 U	0.0002 U	
SB-8 @ 2'	6/24/2010	-6'	2'	<1	0.0003 U	0.0003 U	0.0004 U	0.0011 U	0.0022 U	0.0002 U	0.0031 U	0.0005 U	0.0003 U	
SB-8 @ 4'	6/24/2010	-6'	4'	<1	0.0003 U	0.0003 U	0.0004 U	0.0011 U	0.0020 U	0.0002 U	0.0028 U	0.0005 U	0.0002 U	
SB-8 @ 6'	6/24/2010	-6'	6'	<1	0.0003 U	0.0003 U	0.0004 U	0.0009 U	0.0019 U	0.0002 U	0.0027 U	0.0004 U	0.0002 U	
SB-9 @ 2'	6/24/2010	-6'	2'	<1	0.0002 U	0.0003 U	0.0004 U	0.0006 U	0.0017 U	0.0001 U	0.0024 U	0.0003 U	0.0002 U	
SB-9 @ 4'	6/24/2010	-6'	4'	<1	0.0003 U	0.0003 U	0.0004 U	0.0012 U	0.0023 U	0.0002 U	0.0034 U	0.0005 U	0.0003 U	
SB-9 @ 6'	6/24/2010	-6'	6'	<1	0.0003 U	0.0003 U	0.0004 U	0.0006 U	0.0019 U	0.0002 U	0.0027 U	0.0004 U	0.0002 U	
SB-10 @ 2'	6/24/2010	-6'	2'	<1	0.0003 U	0.0003 U	0.0004 U	0.0010 U	0.0020 U	0.0002 U	0.0029 U	0.0005 U	0.0002 U	
SB-10 @ 4'	6/24/2010	-6'	4'	<1	0.0002 U	0.0002 U	0.0003 U	0.0006 U	0.0015 U	0.0001 U	0.0023 U	0.0004 U	0.0002 U	
SB-10 @ 6'	6/24/2010	-6'	6'	<1	0.0002 U	0.0002 U	0.0003 U	0.0006 U	0.0015 U	0.0001 U	0.0023 U	0.0004 U	0.0002 U	

Notes:
 Concentrations are reported in milligrams per kilogram (mg/kg)
 SCTLs - Soil Cleanup Target Levels - Table II, Chapter 62-777, FAC.
 A bold value represents an exceedance of the SCTLs
 Total BTEX - sum of benzene, toluene, ethyl benzene, and total xylenes
 MTBE - methyl tert-butyl ether
 * or "U" - less than the laboratory method detection limit
 † - The reported value is between the laboratory method detection limit and the method reporting limit
 OVA - Organic Vapor Analyzers
 fns - feet below land surface
 <RL - Less Than Reporting Limit (used by previous consultant)
 NM - Not Measured (used by previous consultant)

TABLE 3: GROUNDWATER ANALYTICAL SUMMARY (Solvents)

Facility Name: Former Shell Sunstate (SAP #136776)
 Facility Address: 6494 South Tamiami Trail, Sarasota
 FDEP Facility ID: 588520798

Sample Location	Date	trans-1,2-Dichloroethane	Vinyl Chloride	Trichloroethylene (TCE)	Tetrahydrofuran (THF)
Table I GCTL		100	1	3	1
Table V NADSC		100	100	300	300
MW-6	3/29/2004	-	-	<0.50	<0.50
Blanked/Destroyed					
MW-7	5/25/2004	-	-	<0.50	<0.50
	11/22/2005	-	-	<0.25	<0.49
MW-8	3/29/2004	<50	-	2.9	0.57
	4/22/2005	<0.5	-	2.1	<0.5
	2/6/2006	-	-	1.1	<1.00
	3/16/2005	-	-	<1.0	<1.0
Blanked/Destroyed					
MW-8R	2/6/2006	<1.00	-	1.1	<1.00
	10/8/2008	<0.359	<0.414	0.720 U	<0.305
MW-8RK	11/22/2007	-	-	0.610 U	<0.230
	11/22/2007	-	-	0.800 U, L	<0.230 U, L
	3/5/2008	<0.244	<0.293	0.614 U	<0.324
	6/9/2008	<0.399	<0.414	<0.508	<0.305
	1/12/2009	<0.399	<0.414	<0.508	<0.305
	3/19/2009	<0.244	<0.293	0.610 U	<0.324
	6/24/2010	0.399 U	0.414 U	0.664 U	0.452 U
MW-9	7/12/2005	-	-	<1.5	<0.28
MW-10	7/12/2005	-	-	<1.5	<0.28
	11/22/2005	-	-	<0.28	<0.49
MW-11	7/12/2005	-	-	<1.5	<0.28
MW-12	7/12/2005	-	-	<1.5	<0.28
	2/12/2006	<1.00	-	<1.00	<1.00
	6/24/2010*	0.399 U	0.414 U	0.508 U	0.305 U
MW-12R	11/22/2007	-	-	0.570 U	<0.230
	11/22/2007	-	-	<0.230	<0.230
	5/3/2008	<0.244	<0.293	<0.167	<0.324
	6/9/2008	<0.399	<0.414	<0.508	<0.305
	10/8/2008	<0.399	<0.414	<0.508	<0.305
	1/12/2009	<0.399	<0.414	<0.508	<0.305
Blanked/Destroyed					
MW-14	10/8/2008	<0.399	<0.414	<0.508	<0.305
	6/24/2010	0.399 U	0.414 U	0.508 U	0.305 U
MW-15R	10/8/2008	<0.399	<0.414	<0.508	<0.305
MW-16	2/16/2006	<0.199	<0.414	<1.0	1.36

Notes:
 Concentrations are reported in micrograms per liter (µg/L), unless otherwise noted
 Blank cell indicates no data
 GCTLs - Groundwater Cleanup Target Levels - Table I, Chapter 62-777, FAC.
 NADSCs - National Action Default Scores, Concentrations - Table V, Chapter 62-777, FAC
 "<" or "U" - less than the method detection limit
 1 - The reported value is between the laboratory method detection limit and the method reporting limit
 * - Not Sampled or analyzed
 ** The sample collected from MW-12 on 6/24/2010 was erroneously mislabeled as MW-12R on the COC

TABLE 3: GROUNDWATER ANALYTICAL SUMMARY (Solvents)

Facility Name: Former Shell Sunstate (SAP #136776)
 Facility Address: 6494 South Tamiami Trail, Sarasota
 FDEP Facility ID: 58852079R

Sample Location	Date	Transect, Profile or Station	Vapor Chloride	Total Chloride by Test (µg/L)	
				1	2
Table I GCFL		100	1	3	3
Table V NADSC		100	100	300	300
MW-17	2/16/2005	-	-	<1.11	<1.0
	3/17/2005	<1.11	-	<1.05	<1.0
	4/12/2007	<0.244	<0.293	<0.187	<0.224
	6/24/2010	0.399 U	0.414 U	0.508 U	0.370 U
MW-18	3/22/2005	<1.11	-	<1.00	<1.00
	11/05/2007	-	-	<0.230	<0.230
	11/05/2007	-	-	<0.230	<0.230
	3/05/2008	<0.244	<0.293	<0.187	<0.224
	6/29/2008	<0.299	<0.414	<0.508	<0.305
	10/27/2008	<0.299	<0.414	<0.508	<0.305
	6/24/2010	0.399 U	0.414 U	0.508 U	0.305 U
MW-19	10/29/2007	-	-	0.508 U	<0.230
	11/05/2007	-	-	<0.230	<0.230
	3/05/2008	<0.244	<0.293	<0.187	<0.224
	6/29/2008	<0.299	<0.414	<0.508	<0.305
	10/29/2008	<0.299	<0.414	<0.508	<0.305
	3/11/2009	<0.244	<0.293	<0.187	<0.224
	6/24/2010	0.399 U	0.414 U	0.508 U	0.305 U
DW-1	3/29/2001	-	-	<0.50	<0.50
DW-2	8/9/2001	-	-	<0.50	<0.50
Infiltration (Dewick)	5/15/2001	-	-	<0.30	<0.30
Equipment Blank	6/24/2010	0.399 U	0.414 U	0.508 U	0.305 U

Notes:
 Concentrations are reported in micrograms per liter (µg/L) unless otherwise noted.
 Blank cell indicates no data.
 GCFLs - Groundwater Cleanup Target Levels - Table I, Chapter 62-777, FAC.
 NADSCs - Natural Attenuation Default Source Concentrations - Table V, Chapter 62-777, FAC.
 "c" or "U" - less than the method detection limit.
 I - The reported value is between the laboratory method detection limit and the method reporting limit.
 "N" - Not Sampled or Analyzed.