



# INITIAL NOTICE OF CONTAMINATION (INOC) BEYOND SOURCE PROPERTY BOUNDARIES

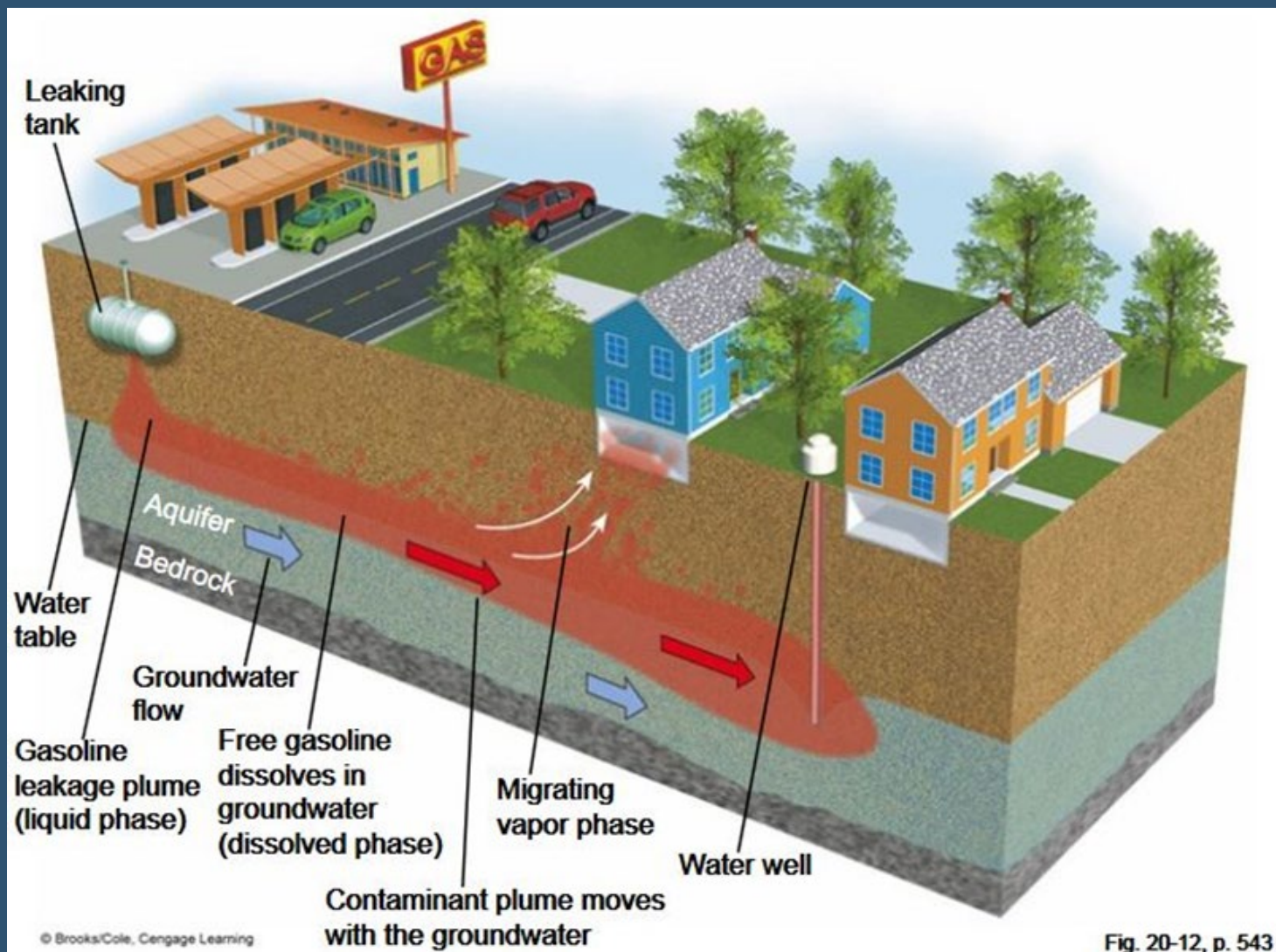
**Mitchell Landsea**

Division of Waste Management/Petroleum Restoration Program  
Florida Department of Environmental Protection  
Tallahassee, Florida | April 15-17, 2025





# Initial Notice Of Contamination (INOC)



## Agenda

- Initial Notice Of Contamination (INOC) Beyond Source Property Boundaries.
  - Expanded Notice of Contamination. Beyond Source Property Boundaries.
- Additional noticing.

Source: Brooks/Cole, Cengage Learning (Figure 20-12, p. 543)



# INOC BEYOND PROPERTY BOUNDARIES

## **Noticing of Contamination Beyond Source Property Boundaries.**

Florida Statutes 376.3071, 376.30702 – Inland Protection Trust Fund Chapter 376 Section 3071 - 2024 Florida Statutes (F.S.) authorizes the Florida Department of Environmental Protection (DEP) whenever, in its determination, incidents of inland contamination related to the storage of petroleum or petroleum products may pose a threat to the public health, safety or welfare, water resources or the environment to assess and remediate contamination and notify the affected parties during the process for the protection of the public health, safety and welfare of the residents of this state.



# INOC BEYOND PROPERTY BOUNDARIES

## Noticing of Contamination Beyond Source Property Boundaries.

Within 10 days of discovery of confirmed contamination beyond source property boundaries, the person responsible for site rehabilitation (PRSR) is required to notify Division of Waste Management (DWM), Local Health Department (DOH) and District of the offsite contamination (soil/sediment or aqueous). We call this notification the “INOC packet”. Email packet to [PRP.NoticeofCont@FloridaDEP.gov](mailto:PRP.NoticeofCont@FloridaDEP.gov) and copy (CC) the Noticing Coordinator.

**For state-funded cleanup, the site manager ALWAYS signs the offsite noticing packet on behalf of the Department [DEP is the Person Responsible for Site Rehabilitation (PRSR)].**



# EXPANDED NOTICING

For funded sites with suspected contamination (from a signed and sealed report), DEP provides notice to the suspected offsite property owners under what is called “Expanded Noticing”- see the Nov. 14, 2008, memo titled Guidance for Contamination Notification (page seven, section VI.).



# INOC PACKET COMPILATION

- Completed and signed “Initial Noticing Beyond Property Boundaries” Florida Department of Environmental Protection (DEP) Form 62-780.900(1)- first page is for the source property info, page two is completed for **each** offsite/non-source property with contamination (suspected or confirmed).
- Contaminant Data Tables for each contaminated medium (groundwater, soil, surface water or sediment.)



# INOC PACKET COMPILATION

- Property appraisers map with source property highlighted and offsite properties labeled A/B, etc.
- A vicinity map that shows all the location(s), date(s) and type(s) of sample(s) collected, the laboratory analytical result(s) for each sample and the property boundaries for the property at which site rehabilitation was initiated pursuant to this chapter and the real property(ies) at which contamination was discovered labeled A/B, etc. (if suspected contamination, report/figures **must** be signed and sealed).
- Applicable lab reports or up-to-date analytical tables.



# INOC PACKET CONTINUED

Site Managers can have Agency Term Contractors (ATCs) create INOC Packets [Schedule of Pay Item (SPI)1-3] for funded sites.

- The ATC leaves the signature portion of DEP Form 62-780.900(1) blank.
- ATCs are not the PRSR and are never to sign as the PRSR for funded sites.

The site manager must review the INOC package prepared by the ATC, sign as the PRSR and **then** submit it to Tallahassee [PRP.NoticeofCont@FloridaDEP.gov](mailto:PRP.NoticeofCont@FloridaDEP.gov) and simultaneously submit the package **to the appropriate DEP District and county DOH.**





# PACKET COMPONENTS - TAKE A LOOK



## Initial Notice of Contamination Beyond Property Boundaries

DEP Form # 62-780.900(1)  
Form Title: Initial Notice of  
Contamination Beyond  
Property Boundaries  
Effective Date: 06/12/13  
Incorporated in rule: 62-780.220

This form provides written notification of the discovery of contamination [as defined in subsection 62-780.200(9), F.A.C.] required by subsection 62-780.220(2), Florida Administrative Code (F.A.C.) and Section 376.30702(2), F.S. If a site is subject to Chapter 62-780, F.A.C., notification shall be postmarked within 10 days from the date of discovery of contamination in any medium beyond the boundaries of the property at which site rehabilitation was initiated pursuant to this chapter. The notification shall be submitted to the Florida Department of Environmental Protection (FDEP), Division of Waste Management, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and copies shall be mailed to the County Health Department, to the appropriate FDEP District Office where the property is located, and to all known lessees and tenants of the property at which site rehabilitation was initiated (see Note on page 2). This form and any attached table(s) shall be completed in entirety.

1. Attach completed and separate tables by medium (groundwater, soil, surface water, or sediment) that list all sampling locations; sampling date(s); names of contaminants detected above CTLs; their corresponding CTLs; the contaminant concentration(s); and whether the CTL is based on health or nuisance, organoleptic, or aesthetic concerns.

2. Attach copies of applicable laboratory reports.

3. Attach a vicinity map that shows all of the location(s), date(s) and type(s) of sample(s) collected, the laboratory analytical result(s) for each sample, and the property boundaries for the property at which site rehabilitation was initiated pursuant to this chapter and the real property(ies) at which contamination was discovered.

4. Information regarding the property that is the subject of this site rehabilitation:

FDEP Facility Identification Number: 35/8509837 Owner of Property: Joe's Carwash 2 LLC  
Contact Person: Ted Scheuman Telephone Number: 561-386-5747  
E-mail Address: ted@fttaxadvisors.com Operator (if applicable): \_\_\_\_\_  
Property Physical Address: 430 US Highway 27, Clermont, FL 34714

5. Actions taken or proposed actions regarding suspected contamination (e.g., provide additional notice, removal of contaminated soil, connection to public water supply well, provision of bottled water, etc.):  
Provide additional notice and continue monitoring through Florida Department of Environmental Protection.

6. Additional Comments:

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

Seema Shah

Printed Name of PRSR or Authorized Agent or Representative

Signature of PRSR or Authorized Agent or Representative

Provide Affiliation: PRP Team 5

Completed by: PRSR or Agent or Representative  
(Circle Appropriately)

Date Signed: 10/17/2022

This form is submitted pursuant to subsection 62-780.220(2), F.A.C. and Section 376.30702(2) F.S., to notify the FDEP, the applicable County Health Department and lessees and tenants of the property at which site rehabilitation was initiated pursuant to this chapter about discovery of contamination beyond the boundaries of the property at which site rehabilitation was initiated pursuant to this chapter. Submission of this form is not an admission of responsibility, liability, or risk associated with potential or actual exposure to such contamination.

(Additional pages may be used to complete this form.)

## DEP Form 62- 780.900(1).

SITE C

DEP Form # 62-780.900(1)  
Form Title: Initial Notice of  
Contamination Beyond  
Property Boundaries  
Effective Date: 06/12/13  
Incorporated in rule: 62-780.220

Form #62-780.900(1)  
Page Two

Note: A separate page two of Form #62-780.900(1) shall be completed for each separate parcel of real property at which contamination was discovered beyond the boundaries of the property at which site rehabilitation was initiated pursuant to this chapter. Please make additional copies of page two as necessary and staple all pages together for submission. This page of this form does not need to be included in the information that is sent to the lessees and tenants of the property at which site rehabilitation was initiated.

1. Street address of real property at which contamination was discovered beyond the boundaries of the property at which site rehabilitation was initiated pursuant to this chapter:

436 US Hwy 27, Clermont, FL 34714

2. Parcel ID # for the real property identified in 1. above: 352426000400007000

3. Name of record owner(s) of the real property identified in 1. above: JCW Shoppes at Cagan Crossings LLC

4. Address(es) of record owner(s) as listed in current county property tax office records (if different from answer provided in 1.):  
725 N Hwy A1A Unit C-106, Jupiter, FL 33477

5. Telephone Number(s) of record owner(s): \_\_\_\_\_

6. Date of discovery of contamination at real property identified in 1. above: 9/6/2022

Remainder of page intentionally left blank.



# DEP Contaminant Tables (confirmed/suspected and media).







# PACKET COMPONENTS - TAKE A LOOK

Lab report or tables (if available).



Workorder: Sir Speedy Printing (T2200666)

FINAL

## Analytical Results

Lab ID: T220066602	Date Collected: 01/07/2022 14:58				Matrix: Water			
Sample ID: MW-10	Date Received: 01/10/2022 12:10							
Parameter	Results	Units	PQL	MDL	DF	Prepared	Analyzed	Lab
SEMIVOLATILES (SW-846 3510C/SW-846 8270C (SIM))								
1-Methylnaphthalene	6.1	ug/L	0.19	0.040	1	01/12/2022 11:15	01/13/2022 19:56	T
2-Methylnaphthalene	8.4	ug/L	0.19	0.031	1	01/12/2022 11:15	01/13/2022 19:56	T
Acenaphthene	0.029	ug/L	0.19	0.026	1	01/12/2022 11:15	01/13/2022 19:56	T
Acenaphthylene	0.030	ug/L	0.19	0.030	1	01/12/2022 11:15	01/13/2022 19:56	T
Anthracene	0.050	ug/L	0.19	0.050	1	01/12/2022 11:15	01/13/2022 19:56	T
Benzo[a]anthracene	0.040	ug/L	0.19	0.040	1	01/12/2022 11:15	01/13/2022 19:56	T
Benzo[a]pyrene	0.034	ug/L	0.19	0.034	1	01/12/2022 11:15	01/13/2022 19:56	T
Benzo[b]fluoranthene	0.041	ug/L	0.094	0.041	1	01/12/2022 11:15	01/13/2022 19:56	T
Benzo[g,h,i]perylene	0.042	ug/L	0.19	0.042	1	01/12/2022 11:15	01/13/2022 19:56	T
Benzo[k]fluoranthene	0.026	ug/L	0.19	0.026	1	01/12/2022 11:15	01/13/2022 19:56	T
Chrysene	0.029	ug/L	0.19	0.029	1	01/12/2022 11:15	01/13/2022 19:56	T
Dibenz[a,h]anthracene	0.050	ug/L	0.19	0.050	1	01/12/2022 11:15	01/13/2022 19:56	T
Fluoranthene	0.035	ug/L	0.19	0.035	1	01/12/2022 11:15	01/13/2022 19:56	T
Fluorene	0.036	ug/L	0.19	0.036	1	01/12/2022 11:15	01/13/2022 19:56	T
Indeno[1,2,3-cd]pyrene	0.040	ug/L	0.19	0.040	1	01/12/2022 11:15	01/13/2022 19:56	T
Naphthalene	31	ug/L	0.19	0.052	1	01/12/2022 11:15	01/13/2022 19:56	T
Phenanthrene	0.034	ug/L	0.19	0.034	1	01/12/2022 11:15	01/13/2022 19:56	T
Pyrene	0.035	ug/L	0.19	0.035	1	01/12/2022 11:15	01/13/2022 19:56	T
VOLATILES (SW-846 5030B/SW-846 8260B)								
Benzene	0.28	ug/L	1.0	0.28	1	01/12/2022 14:59	01/13/2022 01:10	T
Ethylbenzene	22	ug/L	1.0	0.56	1	01/12/2022 14:59	01/13/2022 01:10	T
Methyl tert-butyl Ether (MTBE)	0.71	ug/L	1.0	0.71	1	01/12/2022 14:59	01/13/2022 01:10	T
Toluene	0.66	ug/L	1.0	0.66	1	01/12/2022 14:59	01/13/2022 01:10	T
Xylene (Total)	81	ug/L	2.0	1.3	1	01/12/2022 14:59	01/13/2022 01:10	T

Monday, January 17, 2022 11:05:46 AM  
Dates and times are displayed using (-05:00)  
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## MONITORING WELL ANALYTICAL SUMMARY - VOCs and Metals

#262

Facility ID#: 35/8509837

Sample	Benzene	Toluene	Ethylbenzene	Total Xylenes	MTBE	EDB	1,2-Dichloroethane	Total Arsenic	Total Cadmium	Total Chromium	Total Lead
Well ID	Date	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
GCTLs		1**	40**	30**	20**	20	0.02**	3**	10**	5**	100**
NADCLs		100	400	300	200	200	2	300	100.0	50	1,000
TW-1	03/13/99	680	9,900	1,200	7,600	--	<100	--	--	--	--
TW-2	03/13/99	<5.0	<5.0	<5.0	<10.0	--	<25	--	--	--	--
CW-1	04/30/93	BDL	BDL	BDL	BDL	BDL					
CW-4		BDL	BDL	BDL	BDL	BDL					
TGW-2		BDL	BDL	BDL	BDL	BDL					
TGW-3		BDL	BDL	BDL	BDL	BDL					
MW-1	01/30/02	94	270	480	980	<10	--	--	--	--	--
Destroyed	09/27/02	74.9	260	235	973	7.10	--	--	--	--	--
	11/26/03	119	796	277	1,352	69	--	--	--	--	--
	01/06/05	280	2,800	820	4,000	850	--	--	--	--	--
	11/24/08	100	4,400	2,600	14,000	101	--	--	--	--	--
	08/24/11	0.18 U	49	890	4,400	0.27 U	--	--	--	--	--
MW-1R	09/07/22	0.30 U	2.4	724	14.8	1.2 U	--	--	--	--	--
MW-2	01/30/02	20.0	38	520	5,200	11	--	--	--	--	--
Destroyed	10/03/02	3.99	33	59	315	<1.00	--	--	--	--	--
	11/26/03	30.1	489	256	1,066	1,730	--	--	--	--	--
	01/06/05	80	1,300	540	2,800	44,000	--	--	--	--	--
MW-2R	09/06/22	0.30 U	50.8	106	280	1.2 U	--	--	--	--	--
MW-3	01/30/02	<1.0	<1.0	<1.0	2 U	<1.0	--	--	--	--	--
Destroyed	09/27/02	<1.00	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--
	11/26/03	<1,000	<1,000	<1,000	5.2	1.49	--	--	--	--	--
	01/06/05	<0.30	<0.29	<0.27	<0.86	<0.31	--	--	--	--	--
MW-4	01/30/02	440	10,000	3,200	76,000	72	<0.020	--	--	--	<5
Destroyed	09/27/02	153	1,930	719	2,560	19	--	--	--	--	--
	11/26/03	114	244	725	851	283	--	--	--	--	--
	01/06/05	83	1,400	450	1,870	1,200	--	--	--	--	--
MW-4R	09/07/22	0.30 U	0.33 U	0.30 U	2.1 U	1.2 U	--	--	--	--	--
MW-5	01/30/02	<100	2,400	1,800	10,000	<100	--	--	--	--	--
Abandoned	09/27/02	3.27	716	444.0	2,870	<1.00	--	--	--	--	--
	11/26/03	<1,000	17.0	16.6	183.1	<1,000	<0.020	--	--	--	<5
	01/07/05	<0.21	81	210	1,050	<0.35	--	--	--	--	--
	11/24/08	2.0	17.0	320 L	970 L	1.1	--	--	--	--	--
	08/24/11	0.18 U	0.16 U	70	350	0.27 U	--	--	--	--	--
	02/08/12	0.50 U	0.50 U	77.9	369	0.50 U	--	--	--	--	--
	06/11/13	0.10 U	0.50 U	5.6	46.9	0.50 U	--	--	--	--	--
	10/22/14	0.400 U	0.400 U	0.400 U	4.42	0.400 U	--	--	--	--	--
MW-5R	09/07/22	0.30 U	0.33 U	0.30 U	2.1 U	1.2 U	--	--	--	--	--

## TABLE 3: GROUNDWATER MONITORING WELL ANALYTICAL SUMMARY - VOCs and Metals

Facility Name: Citgo - Martin #262

Facility ID#: 35/8509837

Sample	Benzene	Toluene	Ethylbenzene	Total Xylenes	MTBE	EDB	1,2-Dichloroethane	Total Arsenic	Total Cadmium	Total Chromium	Total Lead
Well ID	Date	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
GCTLs		1**	40**	30**	20**	20	0.02**	3**	10**	5**	100**
NADCLs		100	400	300	200	200	2	300	100.0	50	1,000
MW-6	01/30/02	<1.0	<1.0	<1.0	2 U	<1.0	--	--	--	--	--
Destroyed	09/27/02	<1.00	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--
	11/26/03	<1,000	<1,000	<1,000	<1,000	<1,000	--	--	--	--	--
	01/07/05	0.21 U	0.23 U	0.17 U	0.63 U	0.35 U	--	--	--	--	--
	11/24/08	0.16 U	1.6 U	0.16 U	2.3	0.33 U	--	--	--	--	--
	08/23/11	0.18 U	0.16 U	0.27 U	0.86 U	0.27 U	--	--	--	--	--
MW-7	01/30/02	<1.0	<1.0	<1.0	<1.0	<1.0	<0.020	--	--	--	9.8
Destroyed	09/27/02	<1.00	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--
	11/26/03	<1,000	<1,000	<1,000	<1,000	<1,000	--	--	--	--	--
	01/07/05	0.21 U	0.23 U	0.17 U	0.63 U	0.35 U	--	--	--	--	--
	11/24/08	0.16 U	1.6 U	0.16 U	0.50 U	0.33 U	--	--	--	--	--
	08/23/11	0.18 U	0.16 U	0.27 U	0.86 U	0.27 U	--	--	--	--	--
MW-8	09/27/02	<1.00	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--
Destroyed	11/26/03	<1,000	<1,000	<1,000	<1,000	5.57	--	--	--	--	--
	01/06/05	110	15	200	590	5.8	--	--	--	--	--
MW-8R	09/07/22	0.30 U	0.33 U	5.3	2.1 U	1.2 U	--	--	--	--	--
MW-9	09/27/02	<1.00	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--
Destroyed	11/26/03	<1.00	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--
	01/06/05	<0.30	0.29 U	0.27 U	0.86 U	0.31 U	--	--	--	--	--
MW-10	09/27/02	<1.00	<1.00	<1.00	<1.00	1.80	--	--	--	--	--
Destroyed	11/26/03	<1,000	<1,000	<1,000	<1,000	<1,000	--	--	--	--	--
	01/07/05	0.21 U	0.23 U	0.17 U	0.63 U	0.35 U	--	--	--	--	--
	11/24/08	0.16 U	1.6 U	0.16 U	0.50 U	0.33 U	--	--	--	--	--
	02/08/12	0.50 U	0.79 U	0.50 U	1.3	0.50 U	--	--	--	--	--
	06/11/13	0.10 U	0.50 U	0.50 U	0.50 U	0.50 U	--	--	--	--	--
MW-11	11/26/03	<1,000	70.5	440	3,114	<1,000	--	--	--	--	--
Abandoned	01/07/05	0.21 U	0.23 U	9.6	47	0.35 U	--	--	--	--	--
	11/24/08	0.16 U	1.6 U	2.0	18	0.33 U	--	--	--	--	--
	08/24/11	0.18 U	0.16 U	0.41 U	2.1	0.27 U	--	--	--	--	--
	06/12/13	0.10 U	0.50 U	0.50 U	0.50 U	0.50 U	--	--	--	--	--
	10/22/14	0.400 U	0.400 U	0.400 U	1.00 U	0.400 U	--	--	--	--	--
MW-12	11/26/03	<1.00	<1.00	<1.00	5.3	<1.00	--	--	--	--	--
Abandoned	01/06/05	<0.30	<0.29	<0.27	<0.86	0.31 U	--	--	--	--	--
	11/24/08	0.16 U	1.6 U	0.16 U	0.50 U	0.33 U	--	--	--	--	--
	08/24/11	0.18 U	0.16 U	0.27 U	0.86 U	0.27 U	--	--	--	--	--
	06/12/13	0.10 U	0.50 U	0.50 U	0.50 U	0.50 U	--	--	--	--	--
	10/23/14	0.400 U	0.400 U	0.400 U	0.800 U	0.400 U	--	--	--	--	--
MW-13	01/07/05	0.21 U	0.23 U	0.17 U	0.63 U	0.35 U	--	--	--	--	--
Destroyed	11/24/08	0.16 U	1.6 U	0.16 U	0.50 U	0.33 U	--	--	--	--	--
Abandoned	06/12/13	0.10 U	0.50 U	0.50 U	0.50 U	0.50 U	--	--	--	--	--
	10/23/14	0.400 U	0.400 U	0.400 U	0.800 U	0.400 U	--	--	--	--	--
MW-15	11/24/08	6.61	2,600	2,800	13,000	<8.2	--	--	--	--	--
Destroyed	08/23/11	0.18 U	1,100	2,000	9,500	0.27 U	--	--	--	--	--
MW-15R	09/07/22	0.30 U	0.33 U	0.30 U	2.1 U	1.2 U	--	--	--	--	--





# ADDITIONAL / SUBSEQUENT NOTICING

Any time a **new constituent is detected** (whether confirmed or suspected of state-funded cleanup sites) from a previously reported offsite property **or** a constituent is detected on a **new offsite property** — you should prepare an **additional/subsequent** noticing packet.

This packet only includes the new contaminants for previously noticed offsite properties and/or new offsite properties with newly detected exceedances.

You pick up with nomenclature where you left off (if applicable) and only report **these constituents** and properties on the DEP contaminant tables. All the same components of an INOC packet are required (slides 5 and 6).



# KEY ITEMS TO REMEMBER

Use the correct DEP Contamination table according to media and if confirmed vs. suspected.

Only report a constituent **once** per offsite property (choose the sample location with the highest concentration or closest to the property boundary-whichever is most appropriate).

Suspected contamination can only be reported (expanded noticing) if presented in a signed and sealed report with plume maps.

Any time a **new** constituent is detected (confirmed or suspected) from a previously reported offsite property **or** a constituent is detected on a new offsite property — you should prepare an **additional** noticing packet.

Contractors (for state-funded cleanup) never sign the DEP Form — a site manager must do so as the PRSR.

Non-program discharges are not under obligation to comply with **expanded** noticing (suspected noticing).

Even if an offsite property is owned by the source property owner, the offsite property gets notification.





# THANK YOU

**Mitchell Landsea**

Division of Waste Management/Petroleum  
Restoration Program  
Florida Department of Environmental Protection

Contact Information:

850-245-8883

[Mitchell.Landsea@FloridaDEP.gov](mailto:Mitchell.Landsea@FloridaDEP.gov)