



# Florida Department of Environmental Protection

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July 17, 2017

**SENT BY ELECTRONIC MAIL**

Mr. Saeed Kazemi  
City Manager  
City of Fort Myers  
Email: [skazemi@cityftmyers.com](mailto:skazemi@cityftmyers.com)

RE: ID # COM\_288039, City Block Bordered by South Street, Henderson Ave, Jeffcott Street, and Midway Ave (aka Homerama).

Dear Mr. Kazemi:

Thank you for submitting the City of Fort Myers' ("City") draft Site Assessment Work Plan prepared by GFA International, Inc., for the above referenced site, dated July 14, 2017, GFA Project No. 17-5281.00.

In order to expedite forward movement in this critical assessment phase, which will provide vital information to the City as they develop the subsequent clean-up plans, the Florida Department of Environmental Protection's (DEP's) initial review focused on Sections 3.0, 4.0, and 5.0 of the draft work plan. We continue to encourage the city to compile historical records related to the site, as this can also help inform future clean up steps and answer resident questions about the site.

While prior monitoring was focused on ensuring no offsite migration, as the City moves forward with the remediation and possible redevelopment of the site, it is important that the assessment and clean-up plans meet the criteria and requirements contained in Chapter 62-780, Florida Administrative Code (F.A.C.). Accordingly, DEP has conducted a technical review of the submitted plan for compliance with these regulations, and based on this review offers the following comments:

- Section 4.0: The analyte lists for soil, sludge, groundwater and surface water should be modified as follows:
  - The initial analyte list should contain not only the parameters listed as derived from Appendix A of 40 CFR 423, but all federal and state primary and secondary drinking water parameters as contained in Chapter 62-550, F.A.C. This is to include, but not limited to, aluminum, barium, iron, manganese, molybdenum, radium-226 and radium-228. In accordance

- with the requirements under 62-780, F.A.C., continued inclusion of these analytes would be determined based on the results of the initial rounds of sampling when compared to cleanup target levels.
- Groundwater sampling should include testing for all federal and state primary and secondary drinking water standards (without exclusions) as well as any additional groundwater cleanup target levels promulgated in Chapter 62-777, F.A.C. This is discussed in some sections of the plan (e.g., section 4.2.2, page 9) but is missing in other sections (e.g., section 4.2.2, page 8).
  - All analytes contained in 62-302, F.A.C. should be included in the initial screening criteria, for any surface waters determined not to be transient ponding (i.e. puddles).
  - Phase II samples should also be analyzed for all parameters detected in the lime softening sludge waste material samples to be collected during the DPT Sludge/Waste Characterization.
- Section 4.1.1, page 5: It is not clear if Phase I soil borings will be collected from 0-6” and 6-24” as required by 62-780.600(5)(c)1., F.A.C. Subsequent references (e.g., section 4.2.1, page 8) clearly identify that samples will be collected at these intervals. If the Phase I samples will represent the entire upper two feet, then all detections should be carried forward as Contaminants of Concern (COCs). In accordance with the requirements under 62-780, F.A.C., the continued inclusion of the COCs these analytes would be determined based on the results of the initial rounds of sampling when compared to cleanup target levels.
  - Section 4.1.2, page 6: The sludge characterization should be performed prior to the hand auger borings. This would provide the sludge-related COCs to inform the analytes for sample screening.
  - Section 4.2.1, page 7: Reference to "Upper Control Limit" should be "Upper Confidence Limit" as specified by the rule.
  - Section 4.2.2, page 8: MW-1 is reported destroyed and will need to be replaced. Subsequent discussion in this document raises the possibility of repairing the well; however, the well has likely been compromised and should be properly abandoned and replaced.
  - Section 4.2.2, page 8: The second paragraph appears to be a fragment that belongs elsewhere.
  - Section 4.2.2, page 9: The proposed deep well screen interval for the deep wells is 35’. The proposed deep well screen intervals should be set at depths of 25-30 feet below land surface.
  - Section 4.3.2, page 10: It appears that this section should be labeled 4.2.3; and the reference to section 4.3.2 in the last paragraph of page 10 should be changed to 4.2.2.

Mr. Saeed Kazemi  
July 17, 2017

- Section 5.1, page 11: The “FLUCL” tool is correctly referenced here, however, we recommend use of the most recent version of the US EPA ProUCL tool, which is version 5.1.
- Section 5.1, page 12: For the evaluation of leachability for those compounds that do not have default leachability numbers, it is unclear where the condition that leachability will only be evaluated if more than 50% of the total concentrations are more than 20 times the MCL or GCTL was obtained. Leachability should be evaluated for every COC identified in the sludge or soil. SPLP is an appropriate method for those compounds that do not have a default leachability number. Please see 62-780.680(1)(b)2., F.A.C. for demonstration requirements with regard to leachability.
- Section 5.2, page 12: Rule 62-780.600(3)(h), F.A.C., requires a survey of private potable wells within a ¼ mile radius of the site, stepping out as necessary. Public water system supply wells are to be screened within ½ mile of the site. It is important to conduct a physical survey for private wells and not to solely rely on a database well inventory.
- Section 5.2 page 12: This section states that wells that may be used for potable purposes will be sampled by the Lee County Health Department (LCHD). DEP has an existing contract with the Department of Health and will work with LCHD to have the identified potable wells sampled. The samples would be analyzed by the DEP’s Central Laboratory and its contractors. If the City wishes to perform split sampling with the LCHD, this effort should be coordinated with the LCHD.
- Section 6.0, page 13: The schedule for the completion of this scope of work should be determined as part of this scope of work development and dates certain provided for milestone tasks.

The Department requests the submittal of an amended work plan which addresses these comments for review for consistency with Chapter 62-780, F.A.C. We understand the next step after this review and determination that the amended plan meets all rule requirements will be for the City to publish a public notice of this draft plan and the City's planned public meeting to solicit public comment.

We remain available to assist as needed as the City works to finalize the assessment plan and to working closely with the city to ensure that all aspects of the plan are achieved once it is finalized and approved.

Sincerely,



Jon M. Iglehart  
Director of District Management

JMI/DM/GM/BD/MB/rcd

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