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February 12, 2018

**City of Fort Myers**

**Public Works**

2200 Second Street  
Fort Myers, FL 33902  
(239) 321-7000

**Re: Transmittal Letter-Toxicological Review of Phase I Progress Report Data**

**South Street Property  
FDEP ID: COM\_288039**

**3348 South Street**

**Fort Myers, Florida**

**GFA Project No. 17-5281.02**

Mr. Richard Thompson,

GFA International (GFA) is pleased to present the attached letter report provided by Geosyntec Consultants, Inc. (Geosyntec), regarding their review of the Phase I Progress Report for the South Street Property. Geosyntec's review focused on possible health risks associated with the presence of Arsenic in the lime sludge waste material (LSWM), groundwater and standing water at the South Street Property.

Based on their review of the data included in the Phase I Progress Report, Geosyntec's conclusions included in their letter report are:

- Since homes in the area are connected to the public water system which provides drinking water that is regularly tested to ensure compliance with applicable federal and state drinking water standards, significant exposure to any arsenic in local shallow groundwater is highly unlikely.
- Results of standing water analyses suggest that the levels of arsenic in these water features do not present a concern for people might come into contact them while at the site, even if one were to assume an extreme scenario in which someone intentionally ingested significant amounts of water from these features.
- It is unlikely that exposure to LSWM would be as intensive, as frequent, and occur consistently over a long duration consistent with the highly conservative exposure assumptions used by FDEP to develop the default residential SCTL for arsenic of 2.1 mg/kg.
- The arsenic concentrations detected in LSWM samples from the site are below health-based soil cleanup levels typically used and considered protective for residential properties by USEPA and many states.
- The arsenic concentrations detected in LSWM samples from the site are within the range of naturally occurring arsenic concentrations in soils from other parts of Florida and other regions of the United States.
- Scientific studies examining human exposures to arsenic in soil at sites, including sites with soil arsenic concentrations that are far above the arsenic concentrations that have been detected in samples of

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LSWM, have not reliably associated elevated levels of arsenic in soil with cancer or non-cancer health effects.

- Concentrations of arsenic identified in the samples of LSWM, groundwater, or standing water at the South Street Site are highly unlikely to be related to adverse health effects for members of the community living near the site.

These conclusions are consistent with their conclusion presented to the City Council and to the Public in January 2018, in which they stated “The detected soil arsenic concentrations do not pose a short or long-term health concern to people in the surrounding neighborhood.”

If you have any questions or require further assistance, please do not hesitate to contact me at (239) 489-2443.

**Best Regards,**  
**GFA INTERNATIONAL, INC.**



**Scott A. McManus, P.G.**  
**Environmental Department Manager**

Attachment: Geosyntec Letter Report dated February 12, 2018.

