Florida Department of Environmental Protection

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January 24, 2018

SENT BY ELECTRONIC MAIL

Mr. Saeed Kazemi
City Manager
City of Fort Myers
Email: skazemi@cityftmyers.com

RE: ID # COM_288039, City Block Bordered by South Street, Henderson Ave, Jeffcott Street, and Midway Avenue

Dear Mr. Kazemi:

Thank you for submitting the City of Fort Myers' ("City") Phase I Progress Report for the South Street Property, Facility ID: COM_288039, prepared by GFA International, Inc., dated January 12, 2018, GFA Project No. 17-5281 (hereinafter "Progress Report").

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 Progress Report for compliance with these regulations. We understand that the City planned for this Progress Report to be followed by an addendum of additional technical information.This addendum may already address some or all of the following considerations, however, based on a review of the Progress Report, the Department offers the following comments and requests for additional information:

1. While Figure 7 appears to provide a contour of the horizontal extent of the arsenic , we request that you provide additional clarification regarding the vertical extent supported by appropriate analytical results. Deeper wells, as included in the City's work plan, may be necessary to determine the vertical extent contour. *[62-780.600(3)(b)]*.

2. For all identified cleanup target level (CTL) and/or maximum contaminant level (MCL) exceedances (i.e., arsenic, radium 226/228, iron, aluminum, manganese, TDS and molybdenum), please submit the horizontal and vertical delineation, the rate and direction of migration (considering three dimensions), and the potential for further migration in relation to the property boundary, supported by appropriate analytical results. Again, deeper wells may be necessary as included in the City's work plan. Additional wells may also be necessary. *[62-780.600(3)(a)]*.

3. Please determine the horizontal and vertical rate and direction of groundwater flow (at all affected depths, as appropriate) and provide the appropriate supporting analytical results. Please note that groundwater may move under the Lime Sludge Waste Material ("LSWM") as well as around the LSWM. *[62-780.600(3)(g)4.]*.

4. Please evaluate the potential effect of seasonal variations and vertical groundwater flow components on the rate and direction of groundwater flow, and provide the appropriate supporting analytical analysis. *[62-780.600(3)(g)4.]*.

5. For some of the SPLP samples (DP-10, DP-12, and DP-20), it appears that the minimum required sample size of 100 grams was not provided to the laboratory. For each of these cases, we request you submit the size of the subsample that the laboratory processed and an opinion from the laboratory's quality officer regarding any potential effect this may have on the quality of the reported results. *[EPA Method 1312 and 62-160]*.

6. Please provide the laboratory's quality assurance results from all the SPLP matrix spikes. *[EPA Method 1312 and 62-160]*.

7. Please determine whether any of the wells were installed into the LSWM and whether any adjustments to the estimated contours are necessary based on this information. *[62-780.600(3)(a)]*.

8. There appears to be multiple instances where the laboratory's method detection limit (MDL) was higher than an analyte's applicable cleanup target level (CTL) and/or the drinking water maximum contaminant level (MCL) and/or the regulatory detection limit (RDL) in Chapter 62-550, F.A.C.

   One example to illustrate this point is the acrylonitrile groundwater result reported in Table 2. The CTL is 0.06 ug/L. The laboratory's MDL is 4.6 ug/L. This raises an issue as to whether an adequately sensitive analytical technique was utilized.

   For each instance (soil and groundwater) where the laboratory's MDL for an analyte was higher than the analyte's applicable CTL (including leachability CTL), MCL, or RDL, please provide new sample results or supporting information sufficient to determine whether good faith efforts have been made at measuring contaminants at the lowest achievable levels for the applied method. The DEP guidance document at: http://publicfiles.dep.state.fl.us/dear/labs/sas/library/docs/62_777final.pdf may be helpful. (It may be helpful to add a column to Table 7 listing the applicable leachate CTLs.). *[62-160]*.

9. Groundwater results are reported for "Gross Alpha, excluding Uranium," which suggests that the uranium contribution was determined and subtracted from the measured gross alpha activity. Please provide the uranium results. *[62-160]*.

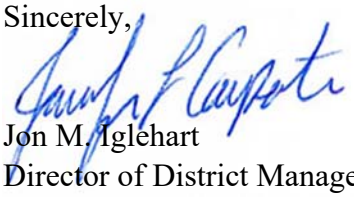
10. If the City wishes to utilize groundwater background concentrations to support its conclusions, then please submit a determination of the relevant background concentrations, supported by appropriate analytical results. *[62-780.600(3)(d)]*. For convenience, here is a helpful guidance link: Groundwater Background Guidance: https://floridadep.gov/sites/default/files/7-GroundwaterBackgroundGuidance2013_0.pdf.

11. Please submit the groundwater sampling logs as well as the boring logs and well logs for all of the monitoring wells. *[62-780.600(3)(a) and (g)]*.

The Department looks forward to receiving this additional information, and will conduct a similar review once received.

We remain available to assist the City as needed, and are committed to working closely with the City to ensure that all aspects of the work plan are achieved and that all requirements of Chapter 62-780, F.A.C., are satisfied.

Sincerely,



for
Jon M. Iglehart
Director of District Management

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Richard Thompson rthompson@cityftmyers.com