



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

September 11, 2019

By Electronic Mail
skazemi@cityftmyers.com

Mr. Saeed Kazemi
City Manager
City of Fort Myers
2200 Second Street
Fort Myers, Florida 33901

Re: South Street Property
3348 South Street, Fort Myers, Lee County
Lime Residuals Removal Report, dated June 24, 2019
Site Assessment Report Addendum, dated June 28, 2019
Additional Information submitted on August 12, 2019
FDEP Site ID#: COM_288039

Dear Mr. Kazemi:

The Department of Environmental Protection (Department) has reviewed the Lime Residuals Removal Report (LRRR), dated June 24, 2019, prepared by Black & Veatch (BV), and the Site Assessment Report Addendum (SARA), dated June 28, 2019, prepared by GFA International, Inc. (GFA), for the above referenced site. The Department also reviewed the additional information submitted by GFA on August 12, 2019.

The Department reviewed the reports for consistency with the requirements of Chapter 62-780, Florida Administrative Code (F.A.C.), and offers the following comments:

1. The lime residual excavation conducted from November 26, 2018, to April 29, 2019, purportedly has removed all the lime residuals from the site. A total of 29,839.5 tons of lime residuals were removed from the site and properly disposed. The use of diagnostic soil texture as a field screening method coupled with laboratory analysis of confirmation samples is an acceptable method under Chapter 62-780, F.A.C.
2. Appendix C of the LRRR classified every sample as Loamy Sand. It also states that each sample formed a ribbon. This appears to be inconsistent with the "NRCS Approved Method For Soil Texture By Feel" flow chart provided in Appendix B which shows that the only path to the classification of Loamy Sand requires that the soil does not form a ribbon. Please explain this inconsistency. Also, the laboratory

analysis of select soil samples to confirm that the ratio of sand, silt and clay fell into the loamy sand category shown in the Soil Textural Triangle diagram provided in Appendix B of the LRRR should have been performed. Please provide this information or explain why this was not done.

3. The Department has determined that this interim source removal is complete. Monthly groundwater monitoring will need to be continued to demonstrate that there are no remaining lime residuals present in the subsurface that would affect the groundwater. If groundwater monitoring indicates that there are lime residuals still present in the subsurface, a remedial action plan that addresses the remaining lime residuals will be required and submitted to the Department for review.
4. On June 20, 2019, an additional 17.67 tons of arsenic contaminated soil were removed from three areas on the site and properly disposed. Confirmation soil sampling has demonstrated that there is no remaining soil contamination above the Department's Soil Cleanup Target Levels near the surface of the site.
5. The Department understands that the City intends to install additional monitoring wells and conduct additional testing. The Department concurs that additional monitoring wells and additional testing are necessary to determine the effect of source removal on groundwater quality.
6. The two feet of clean fill being used as an engineering control will need to be certified by a Florida-registered Professional Engineer that to the best of his or her knowledge the engineering control is consistent with commonly accepted engineering practices, is appropriately designed and constructed for its intended purpose, and has been implemented as designed. An engineering control maintenance and monitoring plan will also be needed.

The Department is happy to help the City navigate and understand the applicable Chapter 62-780 regulations. The City is encouraged to have meetings with the Department at various decision points to streamline the path to regulatory closure. If you have any questions, please feel free to contact Michael J. Bland at mike.bland@floridadep.gov or at (850) 245-8912.

Sincerely,

Brian Dougherty
District & Business Support Program, DWM
Department of Environmental Protection

ec: Richard Moulton, rmoulton@cityftmyers.com
Richard Thompson, ftompson@cityftmyers.com
Mark E. Martin, MartinME@bv.com
Scott McManus, smcmanus@teamgfa.com