

Florida Department of Environmental Protection

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Jonathan P. Steverson Secretary

May 5, 2016

VIA EMAIL: Jennette.Seachrist@swfwmd.state.fl.us

Ms. Jennette Seachrist, P.E., Chief Bureau of Natural Systems & Restoration Southwest Florida Water Management District (SWFWMD) 7601 Highway 301 North Tampa, Florida 33637-6759

Subject: Sawgrass Lake Site Restoration Project

Review of 4th Quarter Water Quality Sampling Results 3200 Gandy Boulevard, St. Petersburg, Pinellas County

FDEP Site ID: COM 301769

Dear Ms. Seachrist,

The subject report, dated April 15, 2016 for groundwater and surface water sampling at the Sawgrass Lake Restoration site has been reviewed. The following comments are provided to assist SWFWMD with guiding this cleanup action towards regulatory closure in accordance with the Rehabilitation and Reclamation Agreement (the "Agreement") between the Department and SWFWMD that was entered into on March 24, 2008.

- 1) Analysis of groundwater from the four site monitoring wells indicated that arsenic, total dissolved solids (TDS), and pH do not meet Contaminant Cleanup Target Levels (GCTLs) listed in Table 1 of Chapter 62-777, Florida Administrative Code (F.A.C.). Although TDS in site groundwater far above its GCTL of 500 mg/L is not considered to be a site contaminant associated with known releases to the environment, it is believed to be the result of secondary effects related to the considerable disturbance of shallow and deep soils within the approximate 20 acres of the site where remedial action was performed to address lead contaminated soil. Site closure with conditions is possible under Chapter 62-780, Florida Administrative Code (F.A.C.), but there will need to be an institutional control, in the form of a land management plan, restricting groundwater use within the lead remediation area of the site. In accordance with Rule 62-780.680(2)(c)1, F.A.C., the alternative CTLs for arsenic and TDS are 100 ug/L and 5000 mg/L, respectively. This is an acknowledgement that local background pH in groundwater is below the secondary standard range of 6.5-8.5 pH units thus qualifying the site for Poor Quality designation.
- 2) The site Remedial Action Plan soil cleanup goal of 1,400 mg/kg meets the industrial land use criteria, but is above that for residential use. Therefore, the land management plan mentioned above will also need to address restriction of land use within the lead in soil

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remediation area to those activities compatible with acceptable human exposure to lead in soil up to the 1,400 mg/kg.

- 3) All site monitoring wells must be property plugged and abandoned in accordance with the requirements of Rule 62-532.500, F.A.C. A Well Plugging Report must be submitted within 30 days of well plugging.
- 4) Following completion and/or approval of all the above items, the Department will consider the site cleanup requirements specified in the "Agreement" to have been met. At such time, the Department will issue a Conditional Site Rehabilitation Completion Order documenting closure to this cleanup action.

Please contact Mark Stuckey at <u>mark.stuckey@dep.state.fl.us</u>, or by phone (850) 245-8991, if you have any questions regarding this letter.

Sincerely,

Brian Dougherty, PhD, Administrator Office of District and Business Support

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