

APPENDIX A

FDEP CORRESPONDENCE – OCTOBER 18, 2007



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Florida Department of Environmental Protection

Southeast District Office
400 North Congress Avenue, Suite 200
West Palm Beach, Florida 33401-2913

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Kris McFadden, (Email: KMcFadden@fortlauderdale.gov)
Environmental Services
Public Works Department, City of Fort Lauderdale
949 N. W. 38th Street
Fort Lauderdale, FL 33309

Re: City of Fort Lauderdale Trash Transfer Station
1901 NW 6th Street, Fort Lauderdale, Broward County, Florida
Review of Site Assessment Report Addendum and Site Rehabilitation Plan

Dear Mr. McFadden:

The Department of Environmental Protection (Department) has reviewed the Site Assessment Report Addendum and Site Rehabilitation Plan combined document for the City of Fort Lauderdale Trash Transfer Station, dated August 31, 2007 (received September 6, 2007) that was prepared by the Evans Environmental & Geosciences, LLC. (EE&G) for the above referenced project. This document responds to Department comments of May 17, 2007 and June 22, 2007, includes additional data, and presents a Site Assessment Plan, a Source Removal Plan, and a Natural Attenuation Monitoring Plan.

Please address the comments listed below:

1. The Department has noted the responses to comments to the Department's correspondence dated May 18, 2007 and June 22, 2007.
2. SPLP results indicate that the incinerator ash impacted soil is leachable for aluminum and lead even with the method blank detections of both. Chapter 62-160, Florida Administrative Code (F.A.C.) guidance currently being drafted proposes a 10 fold multiplier to estimate the maximum level potentially introduced by lab sample preparation for the analysis. The SPLP method blank contained 0.09 mg/l aluminum and 0.0025 mg/l lead. The SPLP results greater than 10 times this are lead for Samples #1 and #2 (0.117 mg/l and 2.1 mg/l) and aluminum for Sample #2 (2.99 mg/l). Arsenic was also leachable in Sample #2 (0.014 mg/l).
3. We recommend the well survey commence in an expedient manner. In the event wells are found, those wells may need to be sampled for contaminants of concern.

Site Assessment Plan

4. On page 10 of the report it is stated in section 3.1 that “25 soil borings will be advanced in ROW areas along NW 19th Avenue (east side)”, based on the figure this should be west side of NW 19th Avenue. On the same page point #3 states that “One sample may be collected from the city-owned lot on the southeast corner of NW 6th court and NW 17th avenue”. According to the map, this looks to be the southeast corner of NW 6th Court and NW 16th Avenue. Please clarify.
5. The proposed soil borings proposed on Figure 3A need to be expanded to include (1) samples north and west of SB-5, west of SB-6, 7, and 8 (including offsite areas) and (2) samples on the east side of NW 19th Avenue across from SB-ROW-5 and SB-ROW-6 to complete soil lateral delineation.
6. All proposed soil samples need to be analyzed for polycyclic aromatic hydrocarbons (PAHs) as this group of compounds remains contaminants of concern.
7. Soil boring delineation based on visible debris maybe used, however must be supplemented by actual sample laboratory testing results.
8. A fourth monitor well needs to be installed to complete delineation of the iron plume on the City owned property where SB-ROW-14 was collected.
9. Existing monitor wells MW-1, MW-3, and MW-4 needed to be sampled for this event because (1) their locations are near or in the incinerator ash, (2) the laboratory performing the analyses has been switched. The analyses for these three wells need to include dioxin/furans because of their proximity to documented soil concentrations.

Source Removal Plan

10. Removal of the top two feet in the impacted Right-of-Ways is proposed, recognizing that deeper soil contamination will remain. Will some type of visible/distinctive layer be installed to separate impacted soil from clean backfill?
11. Please be advised that any excavated waste/contaminated soils must be properly characterized for proper handling and disposal. Hazardous waste determinations must be performed in accordance with Chapter 62-730, F.A.C., which references Title 40 Code of Federal Regulation Part 261.

Natural Attenuation Monitoring Plan

12. As one of the objectives of this plan is to determine if the groundwater plume is stable or shrinking, the requested additional offsite monitor well located near SB-ROW-14 should be added. Depending on the results for the SAR, MW-12 may need to be substituted for MW-1.

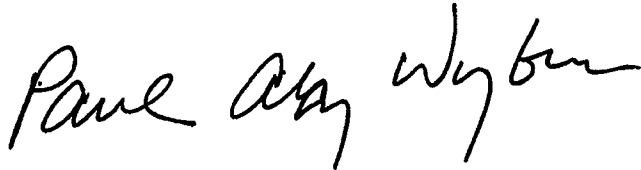
Kris McFadden,
Environmental Services,
Public Works Department, City of Fort Lauderdale
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Please review these comments and submit a Site Assessment Report Addendum for these in accordance with 62-780.600 (10), F.A.C. on or before January 31, 2008.

If you have any questions please contact Ms. Amala Senarath at (561) 681 - 6675.

Thank you for your cooperation in this matter.

Sincerely,



Paul Alan Wierzbicki, P.G.
Waste Cleanup Supervisor

cc: Mr. Jason Sherman, Office of General Counsel, Tallahassee (via Email)
Mr. Ed Udvardy, City of Fort Lauderdale (via Email: eudvardy@fortlauderdale.gov)
Mr. Mike Fayyaz, City of Fort Lauderdale (via Email: mfayyaz@fortlauderdale.gov)
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