



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan E. Matthews
Interim Secretary

May 15, 2017

Keith D. Bell
Tetra Tech
Keith.Bell@tetrattech.com

Re: Former Cape Coral Golf Course (CCGC)
Assessment Summary, received April 19, 2017
Site ID: COM_47335

Dear Mr. Bell:

The Florida Department of Environmental Protection (FDEP), Office of District and Business Support (ODBS) has reviewed the Assessment Summary, received April 19, 2017 for the Former Cape Coral Golf Course (CCGC). The report requests an official determination from FDEP with regard to the cleanup status of the CCGC. We are unable to provide such a determination based upon the information submitted to date.

The report states, "Based on the review of the analytical data, the FDEP concluded that the data did not definitively point to a release from CCGC." We are concerned that this statement somewhat mischaracterizes the conclusion. The conversation referenced in this report concluded that insufficient data was received to make an evaluation by ODBS. This statement remains true since the data collected was not conducted in a manner that satisfies the requirements of site assessment per FDEP Standard Operating Procedure (SOP) 3000 or Rule 62-780.600, Florida Administrative Code (F.A.C.). Examples include using filtered versus unfiltered samples; well construction details are required but have not been presented; laboratory analytical sheets were not supplied; and soil samples were not collected in a manner approved by the FDEP. Rule 62-780.600, F.A.C. should be referenced prior to conducting future investigations to ensure applicable requirements are met

The limited groundwater data provided indicate that there is an exceedance of the groundwater cleanup target level (GCTL) on the CCGC property but the monitoring well network does not appear to be comprehensive enough to rule out CCGC as a source, nor does it provide any indication of where the source might be. Further investigation appears to be necessary to evaluate potential sources.

In addition, the GCTL for arsenic is the maximum contaminant level (MCL). Arsenic concentrations in exceedance of the MCL require action to protect human health and the environment. Therefore, the arsenic plume at CCGC requires delineation and implementation of a protective control to restrict the use of contaminated groundwater. The arsenic GCTL is based on total metals.

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The tables and figures indicate composite sampling was conducted. The accepted method for collecting composite samples is the Incremental Sampling Methodology (ISM). ISM requires compositing of 30 samples, within the decision unit and at the same depth interval, to make one representative soil sample. By Rule, this must be performed 2 more times, resulting in three composite sample results to use in the 95% Upper Confidence Limit (95 UCL) calculation. If ISM will be used for future sampling, please refer to the Incremental Sampling Methodology guidance published by the Interstate Technology & Regulatory Council (ITRC) for a detailed description of the method and its requirements.

All technical documents, including site assessments, submitted to the FDEP for review and evaluation must be signed and sealed by a professional geologist or qualified professional engineer, licensed to practice in the State of Florida.

Based on our review of the Assessment Summary, sufficient evidence has not been provided to demonstrate contaminant concentrations were not the result of historical operations at the CCGC. Consequently, the Site Summary Conclusions cannot be supported.

Future communication should be directed to Gary Maier, FDEP, South District. Mr. Maier can be contacted via telephone at 239-344-5664 or by email Gary.Maier@dep.state.fl.us.

If you have any questions, please do not hesitate to contact me at Lynn.Walker@dep.state.fl.us or 850-245-7502.



Lanita L. Walker, PE
Office of District and Business Support
Division of Waste Management

cc:

Nicola Rivera, Tetra Tech - Nicola.Rivera@tetrattech.com

Gary Maier, FDEP - Gary.Maier@dep.state.fl.us