



Carlos A. Gimenez, Mayor

Department of Regulatory and Economic Resources

Environmental Resources Management

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April 12, 2013

Mr. Stephen E. Johnson, City Manager
City of North Miami
776 NE 125 Street - 4th Floor
North Miami, FL 33161

CERTIFIED MAIL NO. 7011 0470 0002 4385 8062
RETURN RECEIPT REQUESTED

Re: Site Assessment Report Addendum (SARA) dated February 25, 2013 and Supplemental Information dated April 11, 2013 prepared by Eco Advisors, LLC for the Pioneer Gardens/Former Rucks Wastewater Treatment Plant facility (IW5-8624/File-8022) located at, near, or in the vicinity of 13760-13780 NE 5th Avenue, North Miami, Miami-Dade County, Florida.

Dear Mr. Johnson:

The Environmental Monitoring & Restoration Division of the Department of Regulatory and Economic Resources (RER) has reviewed the referenced submittals, received March 1, 2013 and April 11, 2013, respectively, and offers the following comments:

1. The SARA recommends a semi-annual groundwater monitoring only plan (MOP) for all wells at the site for arsenic, ammonia and fecal coliform. RER acknowledges that a No Further Action with Conditions (NFAC) is the closure endpoint sought for the site. However, the MOP cannot be approved at this time because further delineation is required for an NFAC, as follows:
 - a. While RER acknowledges that arsenic concentrations in MW-7 decreased during this last sampling event (from 228 µg/L to 144 µg/L), shallow delineation west of MW-7 is still required. The SARA states that "Eco Advisors will work with the City of North Miami to investigate the feasibility of installing an additional well to the west of MW-7". RER acknowledges the limited space for monitoring well installation immediately west of MW-7 due to the presence of private residences. Therefore, upon investigating the feasibility of installing a well to the west, please contact Sandra Rezola of RER to discuss the location(s) available for monitoring well installation.
 - b. Based on the NFAC option elected, RER does not object to the proposal to install an on-site intermediate depth well for ammonia near the western boundary of the site, as depicted in the site map provided by Eco Advisors on April 11, 2013 via email. However, the need for shallow delineation west of MW-3 for arsenic and fecal coliform is contingent upon resample results for this well. Therefore, a shallow and intermediate-depth well cluster west of MW-3 may prove most efficacious for delineating shallow and intermediate-depth arsenic, fecal coliform and/or ammonia contamination in this area.
 - c. Intermediate-depth delineation for arsenic and ammonia west of and in between MW-Street Sweepings-1D and MW-Street Sweepings-2D is required.

Upon delineation of the groundwater contaminant plumes, provide the results and updated isoconcentration line maps in the next submittal. Please note that separate maps shall be

provided per contaminant of concern and per aquifer stratum. Be advised that current arsenic contaminant concentrations, plume locations and arsenic's natural attenuation potential suggest that the site may not qualify for NFAC groundwater monitoring of the property boundaries at this time. Therefore, upon delineation, the SARA shall include a recommendation for the appropriate site rehabilitation strategy as supported by Section 24-44, Code of Miami-Dade County. If a Monitoring Only Plan is recommended, then the appropriate justification, which considers contaminant concentrations, locations of the source wells in reference to property boundaries, the potential for contamination migration and the contaminant's potential rate of attenuation, shall be provided to support the appropriateness of the groundwater monitoring proposed.

2. The SARA recommends replacement of MW-Nursery-4 which was destroyed. Note that replacement of this well may not be necessary based on the closure with restrictions option elected and depending on the site rehabilitation strategy proposed.
3. The SARA proposed to "acquire soil samples adjacent to OS-1 through OS-3 to determine the end point of arsenic contamination at this location" and to perform off-site sampling for arsenic and PAHs east of UST-28. Be advised that this proposal does not fully address off-site soil contamination delineation needs. Therefore, the next submittal shall include a discussion of the sample results for off-site PAH and arsenic samples OS-1 through OS-14. Specifically, the discussion shall comment on the distribution of the soil contamination on-site and off-site and the suspected contribution of on-site sources to the off-site contamination documented. The discussion shall also include a proposal for delineating and addressing off-site contamination originating from the Pioneer Gardens site.
4. Figure 4 indicates that OS-8 was not analyzed from 2 feet to the water table; however, analytical reports and Table 1c indicate that OS-8(2-3') was analyzed. Please modify the figure accordingly.
5. The next submittal shall include documentation of the proper disposal of the investigation-derived waste (purge water, etc.) referenced in the SARA.
6. Provide the soil lithology logs for the soil borings advanced January 2013. The logs shall include information on the soil cover type at each boring (e.g., open ground, asphalt, etc.) and shall clarify the cause for the high percent moisture in several soil sample (i.e., OS-7 (0-6") with 52.2 percent moisture).
7. Indeno(1,2,3-cd)pyrene in OS-11 (0-6") was 0.093 I, not 0.093 U as indicated in Table 2C. Additionally, analytical reports indicate that groundwater samples were collected on January 29, 2013, not January 30 as indicated in Table 5. Please correct the summary tables accordingly.
8. The soil analytical report for OS-8(2-3) was provided; however, Figure 4 indicates that it was not analyzed. Please correct Figure 4.

Be advised that the vertical and horizontal extent of the contaminant plume(s) shall be fully delineated. RER has the option to split any samples deemed necessary with the consultant or laboratory at the subject site. The consultant collecting the samples shall perform field sampling work in accordance with the Standard Operating Procedures provided in Chapter 62-160, Florida Administrative Code (FAC), as amended. The laboratory analyzing the samples shall perform laboratory analyses pursuant to the National Environmental Laboratory Accreditation Program (NELAP) certification requirements. If

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the data submitted exhibits a substantial variance from RER split sample analysis, a complete resampling using two independent certified laboratories will be required.

RER shall be notified in writing a minimum of three (3) working days prior to the implementation of any sampling or field activities. Email notifications shall be directed to DERMPCD@miamidade.gov. Please include the RER file number on all correspondence.

Therefore, within sixty (60) days of receipt of this letter, you are hereby required to submit to RER for review an addendum to the Site Assessment Report, prepared in accordance with Section 24-44(2)(j)(iv), Code of Miami-Dade County, which shall address the above comments. A review fee of \$462 shall be included with the submittal.

Failure to adhere to the items and timeframes stipulated above may result in enforcement action for this site.

If you have any questions regarding this letter, please contact Sandra Rezola (rezols@miamidade.gov) of the Environmental Monitoring & Evaluation Section at (305) 372-6700.

Sincerely,



Wilbur Mayorga, P.E., Chief
Environmental Monitoring & Restoration Division

sr
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