Memorandum

MIAMI-DADE COUNTY

Date: May 29, 2015

To: Honorable Bruno A. Barreiro
County Commissioner - District 5

From: Carlos A. Gimenez
Mayor

Subject: Notice of Environmental Contamination in Commission District 5

On March 3, 2009, the Board of County Commissioners adopted Resolution No. R-227-09 requiring that when environmental contamination is identified by the Department of Regulatory and Economic Resources, Division of Environmental Resources Management, the Commissioner in whose District the environmental contamination is located shall be notified of such.

Pursuant to R-227-09, please be advised that the attached letter was sent to the party responsible for site rehabilitation on April 29, 2015 due to documented groundwater contamination. There is no evidence of a direct exposure risk to the contaminated soils at this time. However, further soil assessment is pending. Additionally, the site is on municipal water; therefore, their drinking water is not at risk from the groundwater contamination. The owner/operator/responsible party must perform site rehabilitation action in order to bring the site into compliance with Chapter 24 of the Code of Miami-Dade County.

The summary of this case is noted below:

Subject	Environmental Contamination
Facility Name:	Former Automotive Repair Facility and Gas Station (12th Avenue Sunoco)
DERM File #:	File-7774/IW5#10673/UT#1307
Facility Address:	641 NW 12 Ave. and 1152 NW 7 St., Miami, Florida in Miami-Dade County
Folio Number:	01-4102-005-0160 and 01-4102-005-0120
Description/Nature of Violation:	Environmental contamination requiring site rehabilitation action pursuant to Division 3, Contaminated Site Cleanups, Chapter 24, Code of Miami-Dade County, Florida.

Should you have any questions or require additional information, please contact Lee N. Hefty, Assistant Director, Division of Environmental Resources Management in the Department of Regulatory and Economic Resources at (305) 372-6754 or by email at heftyl@miamidade.gov.

Attachment: Site Rehabilitation Order for Environmental Contamination

c: Jack Osterholt, Deputy Mayor/Director, Department of Regulatory and Economic Resources
Lourdes M. Gomez, Deputy Director, Department of Regulatory and Economic Resources
Lee N. Hefty, Assistant Director, Division of Environmental Resources Management, Department of Regulatory and Economic Resources

MIAMI-DADE COUNTY
Carlos A. Gimenez, Mayor

Department of Regulatory and Economic Resources
Environmental Resources Management
701 NW 1st Court, 4th Floor
Miami, Florida 33136-3912
T 305-372-6700 F 305-372-6982
miamidade.gov

May 11, 2015

Mr. Alves S. Cambridge
Ms. Cynthia L. Cambridge
7421 SW 110 Terrace
Pinecrest, FL 33156

CERTIFIED MAIL NO.7013 2630 0001 2418 6477
RETURN RECEIPT REQUESTED

Re: Site Assessment Report (SAR) dated March 24, 2015 and submitted by Nutting Environmental of Florida (NEF), Inc. for the Former Automotive Repair and Gas Station facility (IW5#10673/UT#1307/File-7774/FDEP#N/A) located at, near, or in the vicinity of 641 NW 12 Avenue and 1152 NW 7 Street, Miami, Miami-Dade County, Florida.

Dear Mr. and Ms. Cambridge:

The Department of Regulatory and Economic Resources-Division of Environmental Resources Management (DERM) has reviewed the referenced submittal, received March 27, 2015 and hereby disapproves it due to the following:

1. The Phase 2 states the following: "Twenty 5 gallon plastic and metal containers located along the southeast corner of the asphalt paved lot located on the northwest portion of the subject site...were filled with oily rain water...and one container was noted to be dripping with what appeared to be roofing tar". Additionally, "open containers" were noted next to floor drains inside the southeast repair bay. Furthermore, a "4 inch diameter PVC pipe (mostly below grade) was noted to extend from the southeastern building corner to the soakage pit. NEF has no information regarding the purpose of this 4 inch PVC pipe, as it does not appear to be associated with the storm water management on-site. It is important to note that any discharges of petroleum products and/or hazardous substances to this PVC pipe would have entered the soakage pit and potentially impacted soil and groundwater quality on the subject site". Moreover, "...NEF noted a hose within the oil/water separator which extended across the asphalt paved parking lot to the east and was noted to discharge to the unpaved vacant parcel". Please note that the floor drains, oil/water separator (OWS) hose, the 4 inch PVC pipe and the plastic and metals containers were not depicted on the submitted site maps. Additionally, Figure 2 provided in the Phase 2 report is not scaled. Therefore, provide a scaled site map of sufficient size that clearly depicts the extent of all of the historical and existing potential sources of contamination (soakage pit, tanks, pipes, containers/drum areas, hydraulic lifts, drains, discharge hoses, etc.) in reference to all soil and groundwater sampling locations, open and covered ground areas (including the extent of any stained areas, etc.), utilities, property boundaries and all other pertinent site features. Please include the sample analytical results on said map and Objects A through G referenced in the May 22, 2014 Geophysical Survey.

2. DERM acknowledges that lithology information was provided in Table 1 (Soil Headspace Analysis Results) for soil borings SB-1 through SB-22. However, said table does not indicate if any soil staining, odor and/or any other evidence of contamination were noted. Therefore, please provide this information in the next deliverable.

3. Please indicate the proximity of soil borings SB-1 through SB-22 to the potential sources of contamination (including corresponding backfilled areas). Additionally, clarify why a soil sample for laboratory analysis was not collected from soil borings SB-14 and SB-15, which according to the SAR were advanced in the immediate vicinity of the drum storage area in the southwest corner of the building. Moreover, please indicate why soil sample SB-22(6-8') and groundwater

sample TW-7 were collected outside of the southern repair bay when the potential source of contamination in said area (i.e., hydraulic lift) is depicted within the southern repair bay. Finally, indicate why soil and groundwater samples SB-21(6-8'), SB-22(6-8'), TW-6 and TW-7, collected from the hydraulic lift areas, were not analyzed for VOA analysis. Be advised that based on the information provided, further assessment may be required.

4. A review of the soil assessment data and site maps indicates that sufficient soil samples for laboratory analysis may not have been collected from the appropriate intervals for all potential source areas (i.e., hydraulic lifts, drum/open container storage areas, open ground run-off areas, etc.). Therefore, based on the responses provided to address comments 1, 2 and 3 above, a representative number of discrete soil samples may be required from the 0-2 foot and/or 2-4 foot intervals, as applicable, in all potential source areas for analysis of the appropriate contaminants of concern. Be advised that based on the results, further assessment may be required.

5. DERM acknowledges the submittal of the Phase 2 report. However, the Phase 1 report was not included in the SAR. Please provide the Phase 1 in the next deliverable.

6. The submitted report indicates that the Potable Well Survey provided in Appendix D is from 2010

7. Provide the Monitoring Well Construction and Development Logs for TW-1 through TW-8, MW-A, MW-3, MW-4, MW-5, MW-7 and MW-9. Additionally, indicate how the development water was disposed of.

8. Provide the Calibration Logs for the applicable groundwater sampling equipment used during the June 5, 2014, July 28, 2014 and the December 19, 2014 sampling events.

9. The following omission and discrepancies were noted in the submitted Groundwater Sampling Logs:

    a. The Depth to Water information during the purging of MW-3 and TW-8 on July 28, 2014 and TW-1, TW-2, TW-3, TW-4, TW-5, TW-6, and TW-7 on June 5, 2014 was not provided. Be advised that depth to water measurements shall be collected during each parameter reading attempt to verify that the drawdown has been stabilized.

    b. Please clarify why an excess amount of water (i.e., 27 well volumes, 38 well volumes, 50 well volumes, etc.) was purged from the wells sampled on June 5, 2014 and July 28, 2014. Please note that if the large number of well volumes were purged in order to bring the turbidity readings below 20 NTU, then DERM recommends that the purging flow rate be reduced applicably in an attempt to reduce well turbidity.

    c. The date noted in the December 19, *2015* logs is incorrect (the correct date per the corresponding laboratory report is December 15, *2014*). Be advised that all dates shall be reported accurately in future submittals.

    d. Indicate the type of tubing used to collect the groundwater samples on July 28, 2014 and December 19, 2014. Please note that if polyethylene tubing was used, then please indicate if the polyethylene was composed of high density of low density material.

e. The site name "Pinnacle Southeastern Inc." on the June 5, 2014 and July 28, 2014 logs and "Broward Havana" on the December 19, 2014 logs does not match the site name provided in the submitted report. Please clarify this discrepancy in the next deliverable.

10. The submitted report includes multiple soil and groundwater analytical results tables with different site names. Please provide one single analytical results table for all applicable groundwater contaminants of concern and one single analytical results table for all applicable soil contaminants of concern.

Be advised that the levels of groundwater analytical results (Isopropyl-benzene) submitted in this report constitute violations of Chapter 24, Code of Miami-Dade County (the Code), specifically, Sections 24-44, 24-27, 24-28, and 24-29 of the Code.

Be advised that the vertical and horizontal extent of the contaminant plume(s) shall be fully delineated. DERM 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 the data submitted exhibits a substantial variance from DERM split sample analysis, a complete re-sampling using two independent certified laboratories will be required.

DERM 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 DERM file number on all correspondence.

Therefore, based on the above, and pursuant to Sections 24-7(15), 24-7(26), and 24-44(2)(g) of the Code, within sixty (60) days of receipt of this letter, you are hereby required to submit to DERM for review two copies of an addendum to the Site Assessment Report, one paper and one electronic PDF on CD, 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 $675 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 Didier Camacho (camacd@miamidade.gov) of the Environmental Monitoring & Evaluation Section at (305) 372-6700.

Sincerely,

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

dc
ec: Jan Beernink, Vice President, Nutting Environmental of Florida, JanB@nutting.biz
Christina Lumpkin, Bilzin Sumberg, clumpkin@bilzin.com