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November 15, 2016

Wilbur Mayorga, P.E., Chief  
Environmental Monitoring & Restoration Division  
Miami-Dade County Department of Regulatory and Economic Resources  
701 NW 1<sup>st</sup> Court, 4<sup>th</sup> Floor  
Miami, Florida 33136

**Re: FPL Former Cutler Power Plant Property  
Remedial Action Plan Approval and  
Response to RER Comments dated October 17, 2016  
HWR-442/File-16360/IW-79**

Dear Mr. Mayorga:

Florida Power & Light Company (FPL) acknowledges the approval of the remedial action plan submitted for the former Cutler power plant property located near 14925 SW 67th Avenue, Miami-Dade County, Florida. We appreciate the efforts of the Department of Regulatory and Economic Resources (RER) - Division of Environmental Resources Management (DERM). The assessment and remedial planning work for Cutler began approximately 4 years ago and has included the preparation of over 40 documents.

In addition to acknowledging the approval of the remedial action plan, this letter also contains responses to the October 17, 2016 comments provided by DERM that were related to the Site Assessment Report Addendum (SARA) and Remedial Action Plan Addendum (RAPA) received by DERM on July 13, 2016. The DERM comments are included below in italics followed by our responses.

- 1. The Interim Monitoring Only Plan provided in Exhibit C shall be implemented. The first sampling report shall be submitted within sixty (60) days upon receipt of this letter. Subsequent sampling reports shall be submitted every one hundred eighty days (180) thereafter.*

**Response:** Groundwater sampling associated with the monitoring plan will be implemented during December 2016. The results of this work will be provided to DERM in January 2017. Subsequent sampling and reporting will be performed every 180 days thereafter as requested.

- 2. Be advised that Sheet C-2 Grading Plan (Overall) continues to identify drainage features within an area of groundwater impact. BERM/Swales are depicted on the southwest portion of the property in an area of groundwater impacts. Therefore, the BERM/Swale in this area shall both be lined with an impermeable liner and re-directed to an area with no groundwater contamination or shall be relocated altogether to an acceptable location. Furthermore, the engineering control over the referenced area of groundwater contamination shall consist of an impermeable surface. Please also note the following:*

- The drainage plans are being reviewed by DERM as submitted only as they relate to potential ex-filtration drainage within areas of groundwater impact and not for design sufficiency. It will be necessary for you to obtain storm water approval from the applicable local, state, and federal agencies once the site development plans are approved and can be evaluated concurrently with drainage*

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- *Once you finalize drainage plans based on site development, they will require review and approval from DERM as they relate to contamination issues. Additional comments other than provided in this conceptual review may be provided. Conceptual drainage plans being reviewed as part of the RAP do not constitute an approval from DERM.*
- *Any modification required to an approved Remedial Action Plan necessary for drainage approval (i.e. modification to proposed surface caps, etc.) will also require review and approval from DERM.*

**Response:** Acknowledged.

3. *The particulate dust air monitoring shall be maintained daily for the duration of the construction of the engineering control. Please note that the Health and Safety Plan and Air Monitoring Plan shall be signed by the appropriate professional prior to site development or implementation of the engineering control.*

**Response:** Acknowledged.

4. *The Engineering Control Plan (Grading Plan); Paving, Grading, and Drainage Plan; and Storm water Pollution Prevention Plan prepared by Ross Engineering, Inc. are required to be signed and sealed by the State of Florida Professional Engineer of record. Approval is contingent upon re-submittal to DERM of signed and sealed copies as described.*

**Response:** Acknowledged.

5. *The Grading Plans contain a note that a minimum of a 15' buffer and an average of a 25' buffer will be maintained between the project limits and the wetland. Please provide details on how soils impacted above default or approved background alternate residential soil cleanup target levels (SCTLs) will be addressed in these areas. This may include restricting access to those areas or ensuring that those areas will be part of a limited access common area as part of the development.*

**Response:** Access to the areas noted above will be restricted with fencing and locked gates to allow for maintenance and for other limited access common purposes.

6. *An elevation survey shall be conducted prior to implementation of the engineering control plan and subsequent to implementation to ensure that the minimum 1 foot elevation increase is present throughout.*

**Response:** Acknowledged.

7. *The Paving Grading and Drainage Plan (no sheet number listed) depicts the geotextile liner extending below the base of the storm water drainage retention area. Be advised that although this is part of the engineering control feature, the geotextile detail shall also be provided in the final drainage plan submittal.*

**Response:** Acknowledged.



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8. *Portions of the report refer to the geotextile fabric being placed directly on the existing ground elevation with the addition of 1-foot of clean fill. However, Section 3.1 of the ECP states that the geotextile liner will be installed in the "excavated area". Please clarify.*

**Response:** The intent is to add 1-foot of clean fill on top of the geotextile liner without excavating impacted soils. In the event that soil was to be removed from a certain area (such as for the installation of a concrete slab or wall), then the geotextile liner would be placed over that area and 1-foot of clean fill added.

9. *Please note that once approved, any changes to an approved RAP that may occur due to a property sale or site development will require DERM review and approval.*

**Response:** Acknowledged.

10. *Comments pertaining to DERMs Coastal Resources Section shall be provided under separate cover.*

**Response:** Acknowledged.

11. *A final comprehensive RAP incorporating the conditions of this Conceptual RAP Approval shall be required.*

**Response:** Acknowledged. Design details related to the approved RAPA will be provided to DERM consistent with the implementation of remedial actions. It is recognized that a subsequent property owner may provide additional details to DERM as part of a RAP modification that could be proposed at a later time. It is further recognized that prior to any development or construction activities occurring on the Cutler property, DERM will be provided with detailed construction plans for review and approval prior to submittal to the Office of Plan Review. The conditions specified in the RAPA and those associated with any subsequent modifications approved by DERM will be part of the construction plans. Protection of the environment and human health is provided for the Cutler property by the approved RAPA and the regulatory processes already in place.

Please contact us if there are any questions or if you have need for additional information.

Sincerely,

Ben T. Foster, P.G.  
Program Manager

cc: Randal Voyles, FPL  
Mark Jones, FPL  
Dean Girard, FPL  
Scott Zednek, Tierra

