

October 31, 2014

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

RECEIVED

October 31, 2014

DERM

**Re: Response to October 17, 2014 DERM Comments
FPL Former Cutler Power Plant Property
14925 SW 67th Avenue, Miami-Dade County, Florida
HWR-442/File-16360/IW-79**

Dear Mr. Mayorga:

The following responses are provided for the October 17, 2014 comments from the Miami-Dade County Department of Regulatory and Economic Resources-Division of Environmental Resources Management (DERM) for the Florida Power & Light Company (FPL) Cutler Power Plant property. The DERM comments were associated with the Site Assessment Report Addendum (SARA) dated August 29, 2014. The DERM comments are provided below followed immediately by our responses.

1. As discussed in the September 19, 2014 DERM/FPL meeting, current elevation differences between the northern FPL boundary and the abutting residential properties are not representative of conditions that existed prior to development of the homes. Contaminant impacts are present at this northern boundary that require delineation (i.e. B53N, B5-3 SB003, SB004, B63N, SB005, SB006, SB020, B6-1 B7-2, B8-1, B9-2 etc.). Therefore, you are required to continue delineation for all chemicals of concern (i.e. arsenic and vanadium) to the north. Please provide a sampling plan for prior review and approval and copy DERM on all site assess requests and agreements. Equivalent depths based on previous elevations shall be considered in the plan.

A soil sampling plan is being prepared as requested to address the onsite and offsite locations referenced above. The plan will be provided as a separate document from this response letter. In accordance with your suggestion, future correspondence and activities associated with offsite delineation will be conducted in parallel but separately from the ongoing work on the FPL Cutler property. This is intended to facilitate the approval of the proposed Cutler site remedy.

2. The Coastal and Wetlands Resources Section of DERM is unable to verify the accuracy of the areas identified as "potential wetland area" and "mangrove swamp wetland" on Figure 6 of the FPL submittal dated 8/4/2014 without conducting a biological assessment and/or wetland delineation at the property. Based on the observations by staff during the cursory site inspection on 5/7/2014, Figure 6 does not accurately represent all jurisdictional wetlands at the property. Staff previously indicated to FPL representatives during the inspection on May 7th, 2014, and in the follow-up email on May 23rd, 2014 that a request for jurisdictional wetland delineation or a complete Class I permit application is required for DERM staff to conduct a jurisdictional wetland delineation.

We will perform the jurisdictional wetland delineation as requested. The Coastal and Wetlands Resources Section of DERM has been contacted to coordinate the effort. Although we requested



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that the work be conducted as soon as possible, we have not received a scheduled date as yet. Waiting on this work is unnecessarily delaying the review of the remedial action plan (RAP). Please proceed with the review of RAP given the following conditions that apply to Cutler:

- The Cutler property and surrounding area have been altered and improved historically – the land was man made;
- The areas previously identified as potentially containing wetland species on the eastern portion of the property were minimal;
- Offsets and clean soil conditions on the far eastern portion of the property are such that clean soil caps would not have to affect jurisdictional areas if present;
- FPL has not proposed any remedial action that would affect the mangroves along the canal; and
- Neither FPL nor the prospective property buyer is going to jeopardize incurring a violation of applicable regulations.

3. Based on item 2 above, the Environmental Monitoring and Restoration Division (EMRD) is unable to evaluate and review the proposed boundary of the engineering control without first establishing which areas are permitted to be removed, filled or capped based on the applicable wetland regulations. The EMRD requires a wetland delineation map, which has been approved by DERM's Coast and Wetlands Resources Section, prior to evaluating any engineering controls.

Please see our response above. Additionally, a wetland delineation map which has been approved by DERM's Coast and Wetlands Resources Section will be provided to the EMRD as soon as it is completed. The map will be provided within a week of performing the delineation work.

4. For areas of the site that are proposed to be remediated to unconditional closure levels (i.e. Central Area), all soil source removals shall extend vertically and horizontally to an existing soil sample that is at or below applicable cleanup target levels or confirmation samples shall be required. The same shall apply to engineering controls for areas proposed for conditional closure. Be advised that for areas that are intended for residential use, engineering controls shall be required for all areas that exceed applicable residential CTLs. For areas that are intended for industrial use, engineering controls shall only be required for areas exceeding applicable industrial CTLs.

Agreed.

5. Be advised that a remedy for groundwater shall also be proposed (i.e. Groundwater monitoring in support of closure with conditions, etc.).

A proposed groundwater monitoring plan has been prepared and is provided in **Attachment A**.

6. Provide the results of a potable and irrigation well survey.

A well survey was included within Section 4 and Appendix B of the Site Assessment Report dated February 7, 2014. The information is summarized below.



Wilbur Mayorga
DERM
October 31, 2014

A well survey was performed for the site area and consisted of reviewing the Miami-Dade County Municipal Wellfield Protection Zone Map, well completion reports available from the South Florida Water Management District (SFWMD), records of the Department of Health Super Act database, and the performance of pedestrian and windshield survey activities in the immediate vicinity to evaluate the presence or absence of iron staining on pavement, buildings, or fixtures that is indicative of irrigation using on-site well water. The well survey findings included:

- Five shallow wells are located one-half mile west and upgradient of Cutler on the north side of Coral Reef Drive or S.W. 152nd Street. These wells previously supplied service and boiler makeup water for the power plant.
- The Miami-Dade Water and Sewer Authority has three water supply wells at the King's Bay Water Treatment Plant, located approximately one-half mile northwest and upgradient Cutler. The wells operate only during periods of peak water demand.
- The review of permitted well data from the SFWMD and DOH Super Act Well database indicated that one private potable well is present within ¼ mile of Cutler.
- Pedestrian and windshield survey of residences and structures within ¼ mile of Cutler did not reveal evidence of private wells utilized for irrigation purposes.

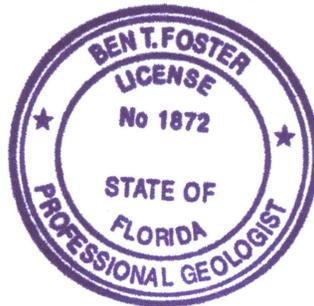
In addition to the information summarized above, an updated well data search was also performed and the results are provided in **Attachment B**.

Please reply at your earliest convenience if you have any questions or require additional information.

Sincerely,

AECOM

Ben T. Foster, P.G.
Program Manager



C: Randal Voyles, Ed Preast, Mark Jones, Peter Cocotos – FPL
Scott Zednek – Tierra Consulting

ATTACHMENT A

Cutler Groundwater Monitoring Plan



AECOM
4010 Boy Scout Boulevard
Suite 300
Tampa, FL 33607
www.aecom.com

813 610 0080

October 30, 2014

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

**Re: Groundwater Monitoring Plan
FPL Former Cutler Power Plant Property
14925 SW 67th Avenue, Miami-Dade County, Florida
HWR-442/File-16360/IW-79**

Dear Mr. Mayorga:

This groundwater monitoring plan is provided for the Florida Power & Light Company (FPL) Cutler Power Plant property. The plan has been prepared in accordance with the October 17, 2014 letter from the Miami-Dade County Department of Regulatory and Economic Resources (RER) Division of Environmental Resources Management (DERM).

Source removal work was previously conducted on the Cutler property to address soil impacted by ash residue, herbicide use, and fuel oil. Additional source removal work has been proposed along with implementing engineering and institutional controls to address remaining soil quality issues. Following the completion of the site remedy at the Cutler property, groundwater monitoring is proposed to be implemented.

The attached Figure 1 shows the locations of monitoring wells proposed for long term groundwater monitoring. Sampling will be conducted for arsenic and vanadium in accordance with standard operating procedures. The monitoring schedule includes semiannual sampling for one year and then annually thereafter for the next five years. Based on the site assessment results, this work will confirm the groundwater quality conditions at the property and conformance of the site remedy with applicable regulations.

Please reply at your earliest convenience if you have any questions or require additional information.

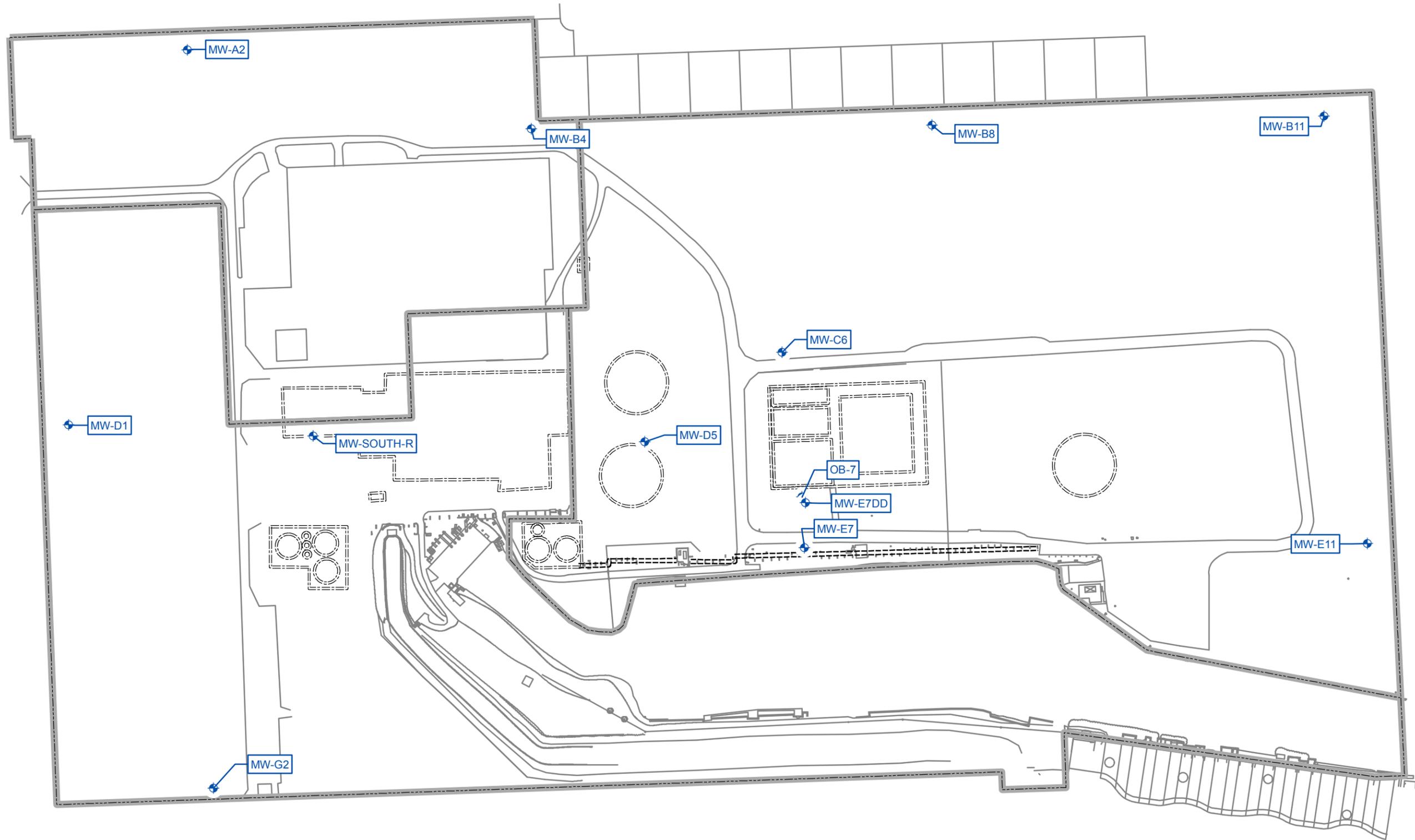
Sincerely,

AECOM

Ben T. Foster, P.G.
Program Manager

Randal Voyles, P.E., FPL
Scott Zednek, P.G., Tierra





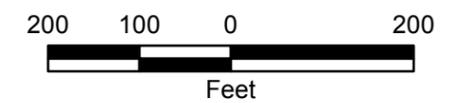
**PROPOSED
GROUNDWATER MONITORING PLAN
WELL LOCATIONS**

**FORMER CUTLER
POWER PLANT PROPERTY
MIAMI, FLORIDA**

LEGEND:

-  MONITORING WELL
-  FORMER PLANT PROPERTY BOUNDARY
-  PROPOSED PARCEL DIVISIONS

SCALE:



ATTACHMENT B

Updated Well Survey Data

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

FEDERAL USGS WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
5	USGS40000232808	1/4 - 1/2 Mile SW
C10	USGS40000232819	1/4 - 1/2 Mile NNW
35	USGS40000232829	1/2 - 1 Mile NNE
G40	USGS40000232832	1/2 - 1 Mile NNW
G41	USGS40000232833	1/2 - 1 Mile NNW
G42	USGS40000232835	1/2 - 1 Mile NNW
G43	USGS40000232831	1/2 - 1 Mile NNW
46	USGS40000232837	1/2 - 1 Mile North
G50	USGS40000232836	1/2 - 1 Mile NNW
53	USGS40000232834	1/2 - 1 Mile NNW
54	USGS40000232827	1/2 - 1 Mile WNW
63	USGS40000232847	1/2 - 1 Mile North
66	USGS40000232817	1/2 - 1 Mile West

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
No PWS System Found		

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
A1	FLSO70000004255	0 - 1/8 Mile NNW
A2	FLSO70000004261	0 - 1/8 Mile NNW
A3	FLSO70000004264	0 - 1/8 Mile NNW
4	FLSO70000004253	1/8 - 1/4 Mile West
6	FLSO70000004252	1/4 - 1/2 Mile West
B7	FLSO70000004287	1/4 - 1/2 Mile North
B8	FLSO70000004289	1/4 - 1/2 Mile North
B9	FLSO70000004290	1/4 - 1/2 Mile North
B11	FLSO70000004291	1/4 - 1/2 Mile NNE
12	FLSA70000003152	1/4 - 1/2 Mile SW
C13	FLSO70000004284	1/4 - 1/2 Mile NNW
B14	FLSO70000004292	1/4 - 1/2 Mile NNE
B15	FLSO70000004297	1/4 - 1/2 Mile NNE
16	FLSO70000004254	1/4 - 1/2 Mile West
B17	FLSO70000004300	1/4 - 1/2 Mile NNE
D18	FLSO70000004304	1/4 - 1/2 Mile North
D19	FLSO70000004305	1/4 - 1/2 Mile North
D20	FLSO70000004306	1/4 - 1/2 Mile North
21	FLSO70000004296	1/2 - 1 Mile NE
D22	FLSO70000004313	1/2 - 1 Mile North
D23	FLSO70000004314	1/2 - 1 Mile North
24	FLSO70000004315	1/2 - 1 Mile North
25	FLSA70000003184	1/2 - 1 Mile NW
26	FLSO70000004316	1/2 - 1 Mile NNW

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
E27	FLSO70000004325	1/2 - 1 Mile North
E28	FLSO70000004326	1/2 - 1 Mile North
E29	FLSO70000004327	1/2 - 1 Mile North
E30	FLSO70000004328	1/2 - 1 Mile North
E31	FLSO70000004329	1/2 - 1 Mile North
E32	FLSO70000004330	1/2 - 1 Mile North
F33	FLSO70000004277	1/2 - 1 Mile WNW
F34	FLSO70000004278	1/2 - 1 Mile WNW
E36	FLSO70000004338	1/2 - 1 Mile North
G37	FLSO70000004334	1/2 - 1 Mile NNW
G38	FLSO70000004335	1/2 - 1 Mile NNW
H39	FLSO70000004317	1/2 - 1 Mile NE
H44	FLSO70000004319	1/2 - 1 Mile NE
H45	FLSO70000004320	1/2 - 1 Mile NE
I47	FLSA70000003197	1/2 - 1 Mile NNW
J48	FLSA70000003156	1/2 - 1 Mile WSW
I49	FLSA70000003192	1/2 - 1 Mile NW
51	FLSA70000003188	1/2 - 1 Mile NW
I55	FLSA70000003206	1/2 - 1 Mile NNW
K56	FLSO70000004346	1/2 - 1 Mile North
K57	FLSO70000004347	1/2 - 1 Mile North
K58	FLSO70000004348	1/2 - 1 Mile North
K59	FLSO70000004349	1/2 - 1 Mile North
K60	FLSO70000004350	1/2 - 1 Mile North
K61	FLSO70000004351	1/2 - 1 Mile North
62	FLSA70000003154	1/2 - 1 Mile WSW
L64	FLSA70000003246	1/2 - 1 Mile NNW
L65	FLSA70000003247	1/2 - 1 Mile NNW

PHYSICAL SETTING SOURCE MAP - 4111413.1s



- County Boundary
- Major Roads
- Contour Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons



- Groundwater Flow Direction
- Sink holes
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location
- Closest Hydrogeological Data
- Oil, gas or related wells
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory

No contour lines were detected within this map area.

SITE NAME: Former FPL Cutler Plant
 ADDRESS: 14925 SW 67 Avenue
 Miami FL 33158
 LAT/LONG: 25.6321 / 80.2975

CLIENT: Tierra Consulting Group Inc.
 CONTACT: Scott Zednek
 INQUIRY #: 4111413.1s
 DATE: October 21, 2014 1:02 pm