

# Florida Department of Environmental Protection

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Secretary

April 5, 2011

S. Lee Crouch  
Executive Corporation of Clearwater, Inc.  
5260 South Landing Drive, Suite 704  
Ft. Myers, FL 33919

Re: Remedial Action Plan and Response to Department Comments  
Countryside Executive Golf Course  
2506 Countryside Blvd.  
Clearwater, Florida  
FDEP Project # 295342  
FDEP Site # 286684

Dear Mr. Crouch:

The Florida Department of Environmental Protection (Department) has reviewed the response to the Department's comments on the Remedial Action Plan prepared by HSA Engineers & Scientists (HSA) for the former Countryside Executive Golf Course site dated January 2011, and has the following comments:

The comments provided herein may be revised or added to, if the Department is provided with, obtains or reviews additional information that would warrant revisions or additions to these comments.

1. The response to comment 9 states that Monitoring wells MW-22, MW-23, MW-25, MW-26, DW-2, DW-3 and DW-4 are proposed as point of compliance wells and shall not exceed the applicable default Groundwater Cleanup Target Level (GCTL) of 10 ug/L for arsenic. Table 3 data indicates that arsenic is present in MW-23 at a concentration of 14.7 ug/L. This well should be resampled and, if arsenic concentrations continue to exceed the GCTL of 10 ug/L for arsenic, additional delineation may be necessary.
2. The action levels noted in response to comment 9 are not acceptable. Action levels pursuant to Rule 62-780.690(8)(e), F.A.C. shall be the GCTLs for any well that was previously non-detect, or had concentrations less than the GCTLs; for wells that


currently exceed the GCTLs, the action levels shall be an increase in concentration of 50% or more from the current concentration reported or the Natural Attenuation Default Concentration (NADC), whichever is lower. For MW-14, which had arsenic at a concentration of 17.4 ug/L, an action level of 100% is acceptable.

3. Monitoring points located beyond the compliance boundary lines must not exceed applicable GCTLs and the point of compliance boundary lines must not extend beyond approved limits due to any changes in arsenic concentrations.
4. Isoconcentration contour lines should be reconstructed for MW-14 and MW-23 to show lines of compliance interpolated proportionately between known monitoring well concentrations. Include all groundwater results from the most recent sampling event on the figures (including non-detected results as less than the reported Method Detection Limits (<MDLs) Please note that Point of Compliance (POC) boundary lines must be accurately drawn since these compliance lines will be used to determine which properties must be included in the TPOC publication.

Per Chapter 62-780, F.A.C., a RAP Addendum must be submitted to the Department within 60 days receipt of this letter or by June 8, 2011. Failure to submit requested information or meet any time frame herein may be a violation of Chapters 376 and 403, Florida Statutes (F.S.). In addition, as field activities are undertaken in the process of performing site rehabilitation you are also subject to the requirement to notify the Department prior to initiating these activities under Rule 62-780.220(1), F.A.C.

Should you have any questions or concerns, please contact me at the letterhead address above, by telephone at (813) 632-7600, extension 373, or by email to [robert.sellers@dep.state.fl.us](mailto:robert.sellers@dep.state.fl.us). For future submittals please send one signed and sealed hard copy plus one electronic PDF deliverable copy and reference the FDEP Project #295342/FDEP Site #286684.

Sincerely Yours,



Robert Sellers, CHMM  
Environmental Specialist III  
Division of Waste Management

cc: Brian Moore, HSA  
William Howell