

June 9, 2011

Florida Department of Environmental Protection

Southwest District 13051 North Telecom Parkway Temple Terrace, Florida 33637-0926

Attention: Mr. Robert Sellers, CHMM

Environmental Specialist III

Subject: Response to April 5, 2011 FDEP Comments

Countryside Executive Golf Course

2506 Countryside Blvd. Clearwater, Florida

HSA Project Number 601-5982-00

Dear Mr. Sellers:

HSA Engineers & Scientists (**HSA**), on behalf of Executive Corporation of Clearwater, Inc., respectfully submits this response to the Florida Department of Environmental Protection (FDEP) April 5, 2011, correspondence that provided comments to the June, 2010, *Remedial Action Plan* and Response to the Department's Comments dated January 2011 prepared by HSA for the above-referenced site. For ease of review, the Department's comments are presented below, followed by HSA's responses.

Comment 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 μ g/L for arsenic is present in MW-23 at a concentration of 14.7 μ g/L. This well should be resampled and, if arsenic concentrations continue to exceed the GCTL of 10 μ g/L for arsenic, additional delineation may be necessary.

Response:

On May 26, 2011 HSA conducted groundwater sampling at existing monitoring well MW-23 per your request. Monitoring well MW-23 was sampled and analyzed for the presence of arsenic by EPA Method 6010. Prior to sampling, depth to water measurements were gathered to determine groundwater elevations at all accessible monitoring wells. A summary of groundwater elevation data is included as **Table 1**. Groundwater analytical data is summarized in **Table 2**.

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Current groundwater elevation data indicate a general decrease in depth to water since the last sampling in December (resulting in a higher groundwater table). Based on the most recent data, groundwater flow is generally towards the northnorthwest across the site with some variations within the southern portion of the site due to the presence of ditches and/or ponds. The horizontal hydraulic gradients were measured between monitoring wells MW-23 and MW-16 at in southern part of the site and between monitoring wells MW-10 and MW-16 at the eastern part and estimated at 0.048 feet per foot (ft/ft) and 0.011 ft/ft, respectively. A groundwater elevation contour map for the shallow zone is included as **Figure 1**. The current groundwater flow direction is generally consistent with historical observations.

Prior to collecting the groundwater sample, the monitoring well was purged in accordance with the FDEP Standard Operating Procedures (DEP-SOP001/01) for Groundwater Sampling (FS 2200). A peristaltic pump equipped with polyethylene and silicone tubing was used to purge the monitoring well. During the purging, field parameters including pH, temperature, dissolved oxygen, specific conductance and turbidity were measured until the parameter stabilized. The stability parameter limits were the following: temperature +/- 0.2 degrees Celsius (°C); pH +/- 0.2 standard units (SU); specific conductance +/- 5.0% of reading; dissolved oxygen (DO) +/- 0.2 milligrams per liter (mg/L) or 10% (whichever is greater); and turbidity +/- 5 Nephelometric Turbidity Units (NTUs) or 10% (whichever is greater), preferably less than 20 NTUs. A completed groundwater sampling data sheet is included in **Appendix A**.

The samples were collected in accordance with the Florida Department of Environmental Protection Standard Operating Procedures (SOPs) protocol and submitted to PEL Laboratories, Inc. for analysis for the presence of arsenic using EPA Method 6010. The groundwater analytical data did not indicated the presence of arsenic at detectable levels at monitoring well MW-23. Groundwater analytical results are summarized in **Table 3** and **Figure 2.** The complete laboratory analytical report and chain-of-custody (COC) are provided in **Appendix B.**

Comment 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 of the Natural Attenuation Default Concentration (NADC), whichever is lower. For



MW-14, which had arsenic at a concentration of 17.4 μ g/L, an action level of 100% is acceptable.

Response:

Acknowledged. Monitoring wells MW-3, MW-5, MW-13, and MW-14 are proposed contaminant plume wells with the following action levels.

Location	Concentration Level	Action Level
MW-3	50%	$82.5 \mu g/L$
MW-5	50%	$45.3 \mu g/L$
MW-13	50%	$52.1 \mu\text{g/L}$
MW-14	100%	$34.8 \mu g/L$
MW-10	GCTL	10 μg/L
MW-20	GCTL	10 μg/L
MW-21	GCTL	$10 \mu\mathrm{g/L}$

Comment 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.

Response:

Acknowledged. Monitoring wells MW-23, MW-25, MW-26, DW-2, DW-3, and DW-4 are proposed as the point of compliance wells and shall not exceed the applicable default GCTL of $10~\mu g/L$. As discussed above, the monitoring well MW-23 recently sampled, does not exhibit a concentration of arsenic at detectable levels. Temporary Point of Compliance (TPOC) wells and the compliance boundary lines are included in the attached **Figure 2**.

Comment 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 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.

Response:

Acknowledged. The revised groundwater analytical map includes the isoconcentration contour lines reconstructed accordingly and included as a **Figure 2.** Although, isoconcentration contour lines were interpolated proportionally between known monitoring wells MW-13 and MW-17, based on the groundwater flow direction, the contaminant plume in vicinity of monitoring well MW-13 less likely to be present beyond the boundary to the south.



flow direction, the contaminant plume in vicinity of monitoring well MW-13 less likely to be present beyond the boundary to the south.

We trust that the above responses are adequate to provide the Department information required to approve the RAP. If you have any questions during your review of these responses, please feel free to contact me at (813) 971-3882.

Sincerely,

HSA Engineers & Scientists

Brian Moore, P.E.

Environmental Program Manager



CERTIFICATION

In accordance with Chapter 471, Florida Statutes, I hereby certify that, to the best of my knowledge, all engineering plans, specifications, and calculations included herein are in accordance with standard and appropriate engineering practices.

Brian Moore, P.E

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TABLES

Well ID	TOC Elevation	Depth to Water	Water Elevation
	6/7	//2006	
DW-1	100	6.65	93.35
TW-1	103.52	8.51	95.01
TW-2	104.58	9.18	95.4
TW-3	102.66	6.92	95.74
TW-4	102.77	7.74	95.03
TW-10	100.56	6.81	93.75
TW-11	100.48	7.74	92.74
TW-12	102.92	8.32	94.6
MW-1R	105.78	5.08	100.7
Pond A	-	-	93.62
T GHG T I		2/2006	75102
DW-1	100	6.71	93.29
TW-1	103.52	6.56	96.96
TW-2	104.58	7.23	97.35
TW-3	102.66	4.36	98.3
TW-4	102.66	5.81	96.96
TW-6	105.45	7.29	
			98.16
TW-7	106.05	9.16	96.89
TW-9	NM	8.61	
TW-10	100.56	4.86	95.7
TW-11	100.48	5.22	95.26
TW-12	102.92	6.37	96.55
TW-14	105.5	8.06	97.44
TW-15	106.21	8.45	97.76
MW-1	105.78	9.01	96.77
MW-2	106.82	9.51	97.31
MW-3	103.44	6.27	97.17
MW-4	102.94	6.41	96.53
Pond A			96.31
Pond B			97.25
		30/2006	
TW-1	103.52	7.04	96.48
TW-2	104.58	4.05	100.53
TW-3	102.66	5.7	96.96
TW-4	102.77	6.75	96.02
TW-5	NM	7.52	
TW-6	105.45	7.8	97.65
TW-7	106.05	10.27	95.78
TW-8	NM	8.59	
TW-10	100.56	7.3	93.26
TW-11	100.48	6.74	93.74
TW-12	102.92	6.96	95.96
TW-13	NM	5.42	-
TW-14	105.5	8.8	96.7
TW-15	106.21	9.05	97.16
TW-16	NM	8	
TW-17	NM	2.32	
MW-1	105.78	4.58	101.2
MW-2	106.82	10.33	96.49
MW-3	103.44	6.94	96.5
MW-4	102.94	7.04	95.9

Well ID	TOC Elevation	Depth to Water	Water Elevation
	11/2	29/2006	
DW-1	100	3.18	96.82
TW-1	103.52	7.41	96.11
TW-2	104.58	7.26	97.32
TW-3	102.66	8.45	94.21
TW-4	102.77	6.41	96.36
TW-5	NM	6.86	
TW-6	105.45	7.42	98.03
TW-7	106.05	7.24	98.81
TW-10	100.56	7.3	93.26
TW-11	100.48	3.51	96.97
TW-12	102.92	6.76	96.16
TW-13	NM	6.34	
TW-14	105.5	7.85	97.65
TW-15	106.21	9.12	97.09
TW-16	NM	7.24	-
TW-17	NM	7.24	
TW-18	NM	6.31	-
TW-19	NM	6.71	-
MW-1	105.78	9.58	96.2
MW-2	106.82	10.33	96.49
MW-3	103.44	6.94	96.5
MW-4	102.94	7.04	95.9
MW-20	NM	NM	
Pond A			95.75
Pond B			96.3
	9/30	/2008**	
MW-5	74.34	4.98	69.36
MW-6	75.9	4.73	71.17
MW-7	75.37	DRY	dry
MW-8	76.18	6.45	69.73
MW-9	76.04	5.87	70.17
MW-10	80.85	9.63	71.22
MW-11	76.53	5.56	70.97
MW-12	79.48	7.7	71.78
MW-13	76.29	4.03	72.26
Staff Guage 1 (Pond 2)	69.96		NM
Staff Guage 2 (Ditch)	69.87		NM
Staff Guage 3 (Pond 1)	71.94		NM
<u> </u>	11/	7/2008	
MW-3	74.34	6.87	67.47
MW-5	74.34	7.97	66.37
MW-6	75.9	7.71	68.19
MW-7	75.37	6.86	68.51
MW-8	76.18	9.41	66.77
MW-9	76.04	8.81	67.23
MW-10	80.85	13.08	67.77
MW-11	76.53	8.47	68.06
MW-12	79.48	10.59	68.89
MW-13	76.29	6.78	69.51
Staff Guage 1 (Pond 2)	69.96	3.65	67.61
Staff Guage 2 (Ditch)	69.87	4.04	67.91
Staff Guage 3 (Pond 1)	71.94	3.58	69.52
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Well ID	TOC Elevation	Depth to Water	Water Elevation
	12/12	/2008	
MW-3	74.34	7.72	66.62
MW-5	74.34	8.31	66.03
MW-6	75.9	8.47	67.43
MW-7	75.37	7.97	67.4
MW-8	76.18	9.56	66.62
MW-9	76.04	8.93	67.11
MW-10	80.85	13.21	67.64
MW-11	76.53	8.63	67.9
MW-12	79.48	10.69	68.79
MW-13	76.29	7.12	69.17
MW-14	70.65	4.22	66.43
MW-15	73.15	6.07	67.08
MW-16	77.17	6.46	70.71
MW-17	75.34	3.75	71.59
MW-18	75.03	6.98	68.05
MW-19	74.54	8.2	66.34
MW-20	73.52	7.98	65.54
MW-21	73.77	7.41	66.36
MW-22	79.41	11.73	67.68
MW-23	76.31	7.7	68.61
Staff Guage 1 (Pond 2)	69.96	DRY	
Staff Guage 2 (Ditch)	69.87	3.98	67.85
Staff Guage 3 (Pond 1)	71.94	DRY	
	12/17	/2008	
MW-3	74.34	7.86	66.48
MW-5	74.34	8.12	66.22
MW-6	75.9	8.43	67.47
MW-7	75.37	8.16	67.21
MW-8	76.18	9.57	66.61
MW-9	76.04	9.00	67.04
MW-10	80.85	13.31	67.54
MW-11	76.53	8.77	67.76
MW-12	79.48	10.74	68.74
MW-13	76.29	7.14	69.15
MW-14	70.65	4.33	66.32
MW-15	73.15	6.16	66.99
MW-16	77.17	6.52	70.65
MW-17	75.34	3.80	71.54
MW-18	75.03	6.98	68.05
MW-19	74.54	8.25	66.29
MW-20	73.52	6.97	66.55
MW-21	73.77	6.12	67.65
MW-22	79.41	11.83	67.58
MW-23	76.31	7.83	68.48
Staff Guage 1 (Pond 2)	69.96	DRY	
Staff Guage 2 (Ditch)	69.87	3.89	67.76
Staff Guage 3 (Pond 1)	71.94	DRY	

Well ID	TOC Elevation	Depth to Water	Water Elevation
	7/0	6/2009	
MW-1RR	74.42	5.19	
MW-3	74.34	4.1	70.24
MW-5	74.34	5.31	69.03
MW-6	75.9	4.69	71.21
MW-7	75.37	4.09	71.28
MW-8	76.18	9.73	66.45
MW-9	76.04	8.88	67.16
MW-10	80.85	12.69	68.16
MW-11	76.53	8.06	68.47
MW-12	79.48	10.96	68.52
MW-13	76.29	4.93	71.36
MW-14	70.65	2.4	68.25
MW-15	73.15	5.61	67.54
MW-16	77.17	5.34	71.83
MW-17	75.34	2.39	72.95
MW-18	75.03	4.96	70.07
MW-19	74.54	4.45	70.09
MW-20	73.52	5.2	68.32
MW-21	73.77	5.44	68.33
MW-22	79.41	11.76	67.65
MW-23	76.31	4.52	71.79
MW-24	74.73	4.89	69.84
MW-25	73.76	4.2	69.56
Staff Guage 1 (Pond 2)	69.96	4.2	68.16
Staff Guage 2 (Ditch)	69.87	3.66	67.53
Staff Guage 3 (Pond 1)	71.94	bent	
	**	20/2009	
MW-1RR	74.42	7.94	66.48
MW-3	74.34	5.44	68.9
MW-5	74.34	7.25	67.09
MW-6	75.9	7.14	68.76
MW-7	75.37	5.89	69.48
MW-8	76.18	10.09	66.09
MW-9	76.04	9.43	66.61
MW-10	80.85	13.73	67.12
MW-11	76.53	9.29	67.24
MW-12	79.48	11.58	67.9
MW-13	76.29	7.42	68.87
MW-14	70.65	3.54	67.11
MW-15	73.15	6.51	66.64
MW-16	77.17	6.4 3.74	70.77
MW-17 MW-18	75.34	3.74 7.08	71.6
MW-18 MW-19	75.03 74.54		67.95
MW-19 MW-20	73.52	7.21 6.33	67.33 67.19
MW-20 MW-21	73.77	6.59	67.18
MW-21 MW-22	79.41	12.42	66.99
MW-23	76.1	7.55	68.55
MW-24	74.73	7.55	67.73
MW-25	73.76	6.05	67.71
MW-26	70.51	3.58	66.93
MW-27	71.11	4.25	66.86
MW-28	70.18	3.41	66.77
DW-2	71.06	3.16	67.9
DW-3	72.36	4.01	68.35
DW-4	71.3	6.51	64.79
Staff Guage 1 (Pond 2)	69.96	3.83	67.79
Staff Guage 2 (Ditch)	69.87	3.57	67.44
Staff Guage 3 (Pond 1)	71.94	bent	
Juli Guage J (1 Ollu 1)	/ 1.24	OCIII	

Well ID	TOC Elevation	Depth to Water	Water Elevation
	11/	5/2009	
MW-1RR	74.42	8.4	66.02
MW-3	74.34	6.39	67.95
MW-5	74.34	7.91	66.43
MW-6	75.9	7.9	68
MW-7	75.37	7.08	68.29
MW-8	76.18	10.18	66
MW-9	76.04	9.55	66.49
MW-10	80.85	13.84	67.01
MW-11	76.53	9.52	67.01
MW-12	79.48	11.67	67.81
MW-13	76.29	7.81	68.48
MW-14	70.65	3.92	66.73
MW-15	73.15	6.66	66.49
MW-16	77.17	6.53	70.64
MW-17	75.34	4.00	71.34
MW-18	75.03	7.58	67.45
MW-19	74.54	7.89	66.65
MW-20	73.52	6.72	66.8
MW-21	73.77	7.05	66.72
MW-22	79.41	12.53	66.88
MW-23	76.1	8.08	68.02
MW-24	74.73	7.61	67.12
MW-25	73.76	6.62	67.14
MW-26	70.51	3.73	66.78
MW-27	71.11	4.24	66.87
MW-28	70.18	3.49	66.69
DW-2	71.06	3.88	67.18
DW-3	72.36	3.79	68.57
DW-4	71.3	6.65	64.65
Staff Guage 1 (Pond 2)	69.96	3.4	67.36
Staff Guage 2 (Ditch)	69.87	3.59	67.46
Staff Guage 3 (Pond 1)	71.94	dry	
	12/	9/2010	
MW-1RR	74.42		
MW-3	74.34	10.24	64.1
MW-5	74.34	8.06	66.28
MW-6	75.9	5.52	70.38
MW-7	75.37	8.64	66.73
MW-8	76.18	10.22	65.96
MW-9	76.04	9.50	66.54
MW-10	80.85	13.89	66.96
MW-11	76.53	12.8	63.73
MW-12	79.48	11.71	67.77
MW-13	76.29	8.05	68.24
MW-14	70.65	7.66	62.99
MW-15	73.15	NM	NM
MW-16	77.17	6.9	70.27
MW-17	75.34	NM	NM
MW-18	75.03	8.2	66.83
MW-19	74.54	8.81	65.73
MW-20	73.52	7.39	66.13
MW-21	73.77	7.84	65.93
MW-22	79.41	12.53	66.88
MW-23	76.1	8.2	67.9
MW-24	74.73	8.8	65.93
		7.8	65.96
MW-25	73.76	7.0	
	73.76 70.51	4.6	65.91
MW-25 MW-26 MW-27	70.51	4.6	65.91
MW-26 MW-27	70.51 71.11	4.6 Destroyed	65.91 Destroyed
MW-26 MW-27 MW-28	70.51 71.11 70.18	4.6 Destroyed 4.20	65.91 Destroyed 65.98
MW-26 MW-27	70.51 71.11	4.6 Destroyed	65.91 Destroyed

Well ID	TOC Elevation Depth to Water		Water Elevation				
5/26/2011							
MW-1RR	74.42	8.35	66.07				
MW-3	74.34	7.44	66.9				
MW-5	74.34	8	66.34				
MW-6	75.9	7.79	68.11				
MW-7	75.37	5.6	69.77				
MW-8	76.18	10.31	65.87				
MW-9	76.04	9.55	66.49				
MW-10	80.85	13.92	66.93				
MW-11	76.53	12.54	63.99				
MW-12	79.48	11.65	67.83				
MW-13	76.29	7.93	68.36				
MW-14	70.65	4.16	66.49				
MW-15	73.15	6.8	66.35				
MW-16	77.17	6.75	70.42				
MW-17	75.34	4.00	71.34				
MW-18	75.03	7.82	67.21				
MW-19	74.54	8.45	66.09				
MW-20	73.52	7	66.52				
MW-21	73.77	7.55	66.22				
MW-22	79.41	9.62	69.79				
MW-23	76.1	8.15	67.95				
MW-24	74.73	8.1	66.63				
MW-25	73.76	7.1	66.66				
MW-26	70.51	4.02	66.49				
MW-27	71.11	4.64	66.47				
MW-28	70.18	3.62	66.56				
DW-2	71.06	3.19	67.87				
DW-3	72.36	3.83	68.53				
DW-4	71.3	9.96	61.34				

Notes:

TOC-top of casing NM- Not Measured

NM- Not Measured

 $[\]ast\ast$ Monitor wells were surveyed to NAVD 88 by Florida Design Consultants, Inc., October 2008

Table 2 Summary of Groundwater and Surface Water Analytical Data Countryside Executive Golf Course, Clearwater, Florida HSA Project Number 601-5982-00

	Sample Date	Arsenic (μg/l)
Point ID	GCTL	10
1 omt 15	NADSC	100
	FSWC	50
	08/27/04	470
	10/07/04	620
TW-1	11/16/04	180
	10/30/06	37
	11/29/06	34
	monitor well mis	
	10/06/04	15
TW-2	11/16/04 10/30/06	8.2 I <4.8
1 W-2	11/30/06	15.7
	monitor well mis	
	10/06/04	100
	11/15/04	23
TW-3	10/31/06	13
	11/30/06	12.3
	monitor well mis	
	10/06/04	87
	11/15/04	75
TW-4	10/30/06	72
	11/29/06	360
	monitor well mis	ssing/destroyed
	10/07/04	330
	11/16/04	540
TW-5	10/30/06	700
	11/29/06	661
	monitor well mis	
	10/07/04	8.4
TW-6	10/30/06	15 I
	11/29/06	11.2
	monitor well mis	
	10/07/04 01/13/05	
TW-7	10/30/06	<2.8 14 I
1 W-7	11/30/06	12.4
	monitor well mis	
	11/15/04	3.5 I
TW-8	10/31/06	21
***	monitor well mis	
	11/15/04	4.4 I
TW-9	monitor well mis	
	11/15/04	<2.8
TW-10	10/30/06	46
	monitor well mis	ssing/destroyed
	11/15/04	13
TW-11	10/31/06	<4.8
1 44-11	11/29/06	4.3 I
	monitor well mis	
	11/15/04	12
	06/13/06	5.44
TW-12	10/31/06	17 I
	11/30/06	9.85
	monitor well mis	
	11/16/04	12
TW-13	10/31/06	12 I
	11/30/06	12.8
	monitor well mis	
	06/13/06	<5 59
	10/30/06	58
TW-14	11/30/06	19

Table 2 Summary of Groundwater and Surface Water Analytical Data Countryside Executive Golf Course, Clearwater, Florida HSA Project Number 601-5982-00

	Sample Date	Arsenic (μg/l)
	GCTL	10
Point ID	NADSC	100
	FSWC	50
	06/13/06	<5
	10/30/06	<4.8
TW-15	11/30/06	<1.8
	monitor well mi	
	06/13/06	<5
	10/30/06	<4.8
TW-16	11/28/06	<1.8
	monitor well mi	
	11/28/06	<1.8
TW-17	monitor well mi	ssing/destroyed
	10/30/06	<4.8
TW-18	11/28/06	<1.8
	monitor well mi	ssing/destroyed
	11/28/06	<1.8
TW-19	monitor well mi	
	12/21/06	<1.8
TW-20	monitor well mi	ssing/destroyed
	07/14/05	17.6
ĺ	08/01/05	12.4
DW 1	08/26/05	15.2
DW-1	11/07/05	<2.8
	11/30/06	9.9
	monitor well mi	ssing/destroyed
MW/ 1	08/26/05	46.9
MW-1	monitor well mi	ssing/destroyed
	06/05/06	<5
MW 1D	10/30/06	38
MW-1R	11/29/06	<1.8
	monitor well mi	ssing/destroyed
MW-1RR	03/16/09	<4.8
	08/26/05	119
	11/07/05	130
	05/30/06	37.3
MW-2	06/13/06	79.8
	10/30/06	400
	11/29/06	14.1
	monitor well mi	ssing/destroyed
	08/26/05	159
	11/07/05	5.4
	10/30/06	24
MW-3	11/29/06	<1.8
	11/07/08	35.6
	12/08/08	47
	12/10/10	55
	08/26/05	87
	11/07/05	<2.8
MW-4	10/30/06	85
	11/29/06	2.07 I
	monitor well mi	0 ,
	09/30/08	33.8
MW-5	11/07/08	8.67 I
	12/10/10	30.2
MW-6	09/30/08	<331
	11/07/08	4.23
	09/30/08	DRY
MW-7	12/10/10	5.49 I
	12/08/08	5 I

Table 2 Summary of Groundwater and Surface Water Analytical Data Countryside Executive Golf Course, Clearwater, Florida HSA Project Number 601-5982-00

	Sample Date	Arsenic (μg/l)			
Point ID	GCTL	10			
1 omt 1D	NADSC	100			
	FSWC	50			
	09/29/08	29.7			
MW-8	11/07/08	6.62 I			
	12/09/10	<3.31			
	09/29/08	32.4			
MW-9	12/08/08	<4.8			
	12/09/10	5.69 I			
MW 10	09/29/08	17.7			
MW-10	11/07/08	5.28 I 3.55 I			
	12/09/10 09/29/08	21.7			
MW-11	12/08/08	<4.8			
1V1 VV -1 1	12/10/10	3.94 I			
	09/30/08	<3.31			
MW-12	12/10/10	<3.31			
	09/29/08	58.6			
	11/07/08	55.2			
MW-13	12/08/08	73			
	12/10/10	34.7			
	12/08/08	8.1 I / 10.5			
MW 14	10/15/09	17 I			
MW-14	10/21/09	20 / 16 I			
	12/10/10	17.4			
MW-15	12/15/08	<4.8			
MW-16	12/10/08	<4.8			
MW-17	12/15/08	<4.8			
MW-18	12/12/08	<4.8			
MW-19	12/12/08	<4.8			
1,1,1,1,1	12/10/10	9.57 I			
MW-20	12/12/08	<4.8			
	12/09/10	8.55 I			
MW-21	12/12/08	<4.8			
MW-22	12/12/08	<4.8			
1477.00	12/12/08	<4.8			
MW-23	12/10/10	14.7			
MW 24	05/26/11	<3.31			
MW-24	03/16/09	<4.8			
MW-25	03/16/09	<4.8			
	12/10/10	8.25 I			
MW-26	11/03/09 12/10/10	<4.8			
MW-27	11/03/09	<3.31 <4.8			
	11/03/09	<4.8			
MW-28	12/10/10	<3.31			
	10/15/09	<4.8			
DW-2	12/09/10	<3.31			
DW2	10/15/09	5.7 I			
DW-3	12/10/10	<3.31			
DW/ 4	11/03/09	<4.8			
DW-4	12/10/10	<3.31			
	Offsite Irrigation Well (Villiage of the Green)				
Irrigation 3	11/07/08	14.3			
	Surface Water Samples				
	5/30/2006	152			
Surface Water	06/13/06	49			
	07/06/09	49			
	n-Site Irrigation Wells (Countrys				
Well 1	05/31/06	<5			
Well 2	05/31/06	3.94 I			

Notes:

Units given in micrograms per liter ($\mu g/l$).

GCTL - Groundwater Cleanup Target Level, set forth in Chapter 62-777, FAC

NADSC - Natural Attenuation Default Source Concentration, set forth in Chapter 62-777, FAC

 $FSWC - Fresh \ Surface \ Water \ Criteria, \ set \ for th \ in \ Chapter \ 62-777, \ FAC$

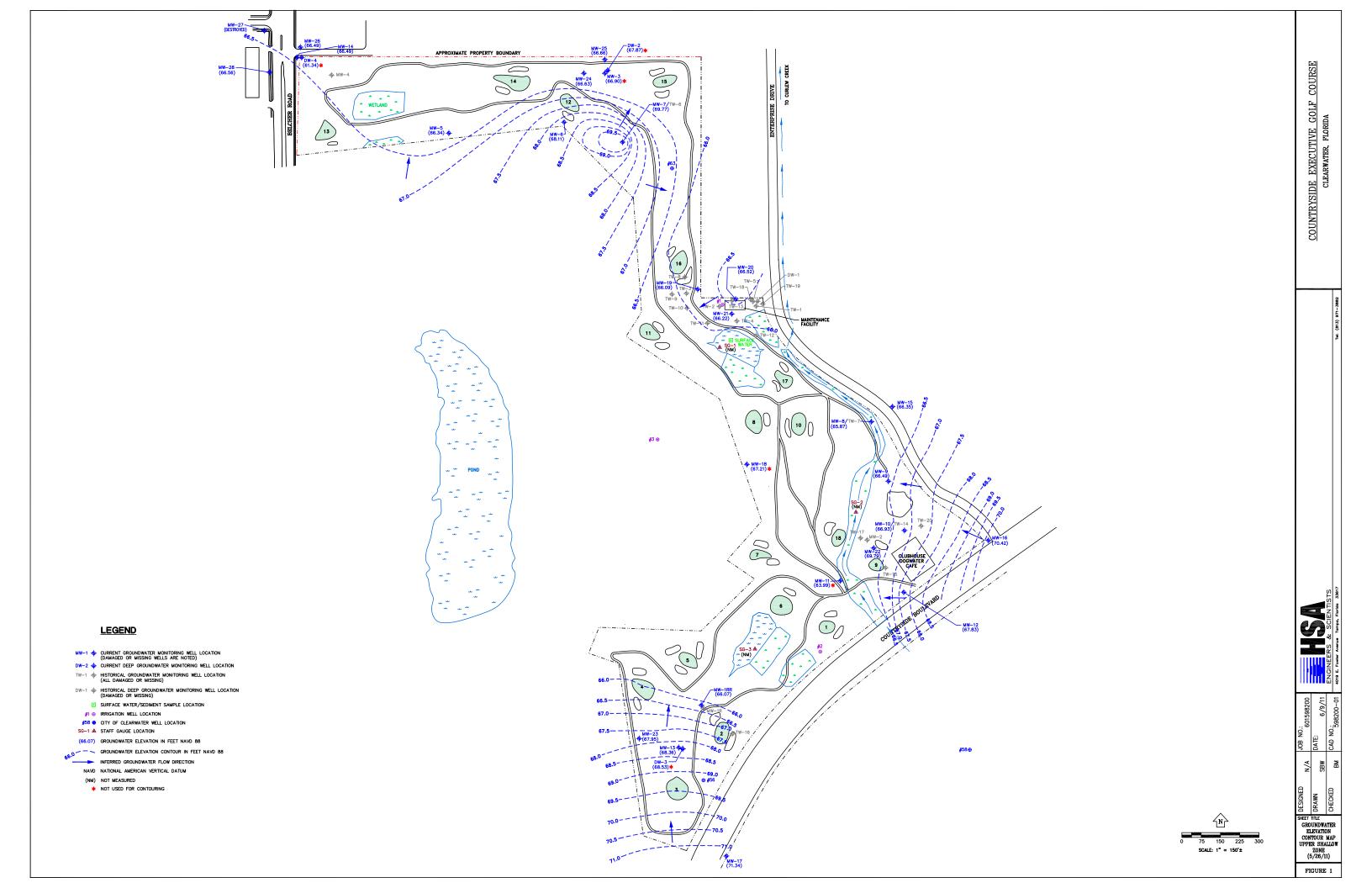
I - Analyte detected below the quantitation limits.

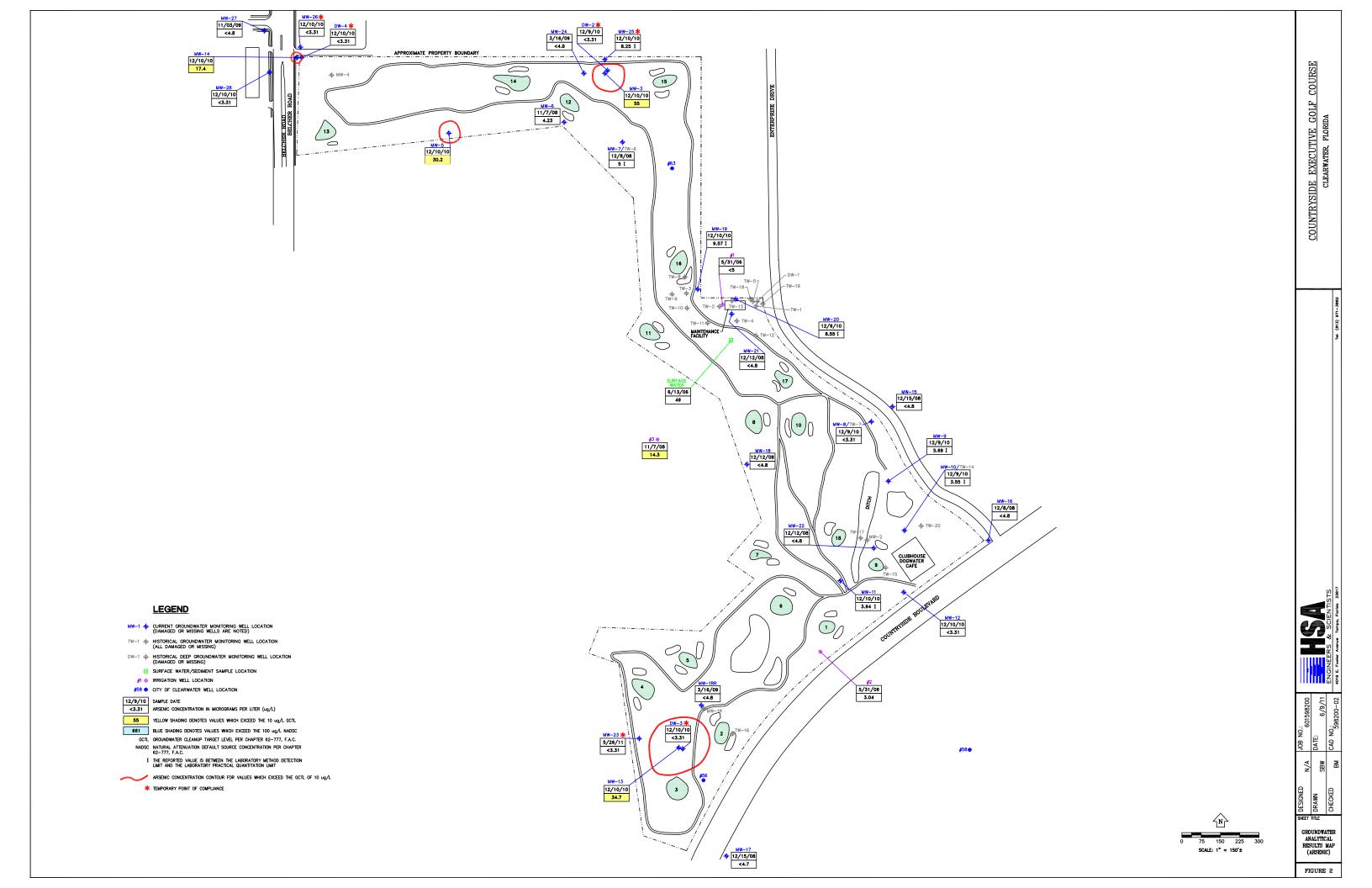
Red indicates result exceeds GCTL or FSWC

Blue indicates result exceeds NADSC



FIGURES







APPENDIX A

Completed Groundwater Sampling Data Sheet

Form FD 9000-24 GROUNDWATER SAMPLING LOG

SITE NAME: CONTROL GOLF COURSE SITE LOCATION: CLEAR WOLFER WELL NO: MW 33 SAMPLE ID: GW PURGING DATA WELL DIAMETER (inches): 7 TUBING DIAMETER (inches): 4 WELL SCREEN INTERVAL DEPTH: STATIC DEPTH TO WATER (feet): 8.15 PURGE PUMP TYPE feet to 3 feet 13 TO WATER (feet): 8.15 OR BAILER: WELL VOLUME PURGE: 1 WELL VOLUME = (TOTAL WELL DEPTH - STATIC DEPTH TO WATER) X WELL CAPACITY (only fill out if applicable) = (13 feet - 8.15 feet) X 0.16 gallons/foot = 0.7716	gallons
PURGING DATA WELL DIAMETER (inches): 7 WELL SCREEN INTERVAL DEPTH: STATIC DEPTH TO WATER (feet): 7 DIAMETER (inches): 7 WELL VOLUME PURGE: 1 WELL VOLUME = (TOTAL WELL DEPTH - STATIC DEPTH TO WATER) X WELL CAPACITY	gallons gallons
WELL VOLUME PURGE: 1 WELL VOLUME = (TOTAL WELL DEPTH - STATIC DEPTH TO WATER) X WELL CAPACITY	gallons gallons
WELL VOLUME PURGE: 1 WELL VOLUME = (TOTAL WELL DEPTH - STATIC DEPTH TO WATER) X WELL CAPACITY	gallons
$= (1)$ feet $= 1$ feet $\times (1)$ gallons/foot $= (1)$	gallons
EQUIPMENT VOLUME PURGE: 1 EQUIPMENT VOL. = PUMP VOLUME + (TUBING CAPACITY X TUBING LENGTH) + FLOW CELL VOLUME	
(only fill out if applicable) = gallons + (gallons/foot X feet) + gallons =	
INITIAL PUMP OR TUBING DEPTH IN WELL (feet): 10.15 PURGING INITIATED AT: 2:00 PURGING ENDED AT: 2:21 PURGED (gallor	s): 1,05
TIME VOLUME PURGED (gallons) CUMUL. VOLUME PURGE RATE (gpm) VOLUME (gpm) (feet) PURGED (gallons) (gpm) (feet) PURGED (gpm) PURGED (gpm) (feet) PURGED (gpm) (gpm	COLOR/ ODOR (describe)
2:15 75 .75 .05 8.62 6.11 1935 27.5 .07 1.82 53	rellow/No
7:18 .15 .90 .05 6.10 1.937 97,5 .07 1.12 53 2:21 .15 1.05 .05 6.10 1.937 578 .07 .73 54	
2:21 15 1.05 -05 \$ 6.10 1.937 27.8 -07 -73 54	_1
WELL CAPACITY (Gallons Per Foot): 0.75" = 0.02; 1" = 0.04; 1.25" = 0.06; 2" = 0.16; 3" = 0.37; 4" = 0.65; 5" = 1.02; 6" = 1.47; 12" = 5.00; 1.25" = 0.06; 1.	38
TUBING INSIDE DIA. CAPACITY (Gal./Ft.): 1/8" = 0.0006; 3/16" = 0.0014; 1/4" = 0.0026; 5/16" = 0.004; 3/8" = 0.006; 1/2" = 0.010; 5/8" = 0.1010; 5/8" = 0.010	GALLEY TO THE STATE OF THE STAT
PURGING EQUIPMENT CODES: B = Bailer; BP = Bladder Pump; ESP = Electric Submersible Pump; PP = Peristaltic Pump; O = Other (Spe	cily)
SAMPLED BY (PRINT) / AFFILIATION: SAMPLER (ST) SIGNATURE (ST) SAMPLING INITIATED AT: 2;21 SAMPLING ENDED AT: 2	7.25
PUMP OR TUBING DEPTH IN WELL (feet): 10-15 TUBING MATERIAL CODE: PE INITIATED AT: 2, 2 ENDED AT: 4 FILLD-FILTERED: Y Filtration Equipment Type:	
FIELD DECONTAMINATION: PUMP Y N TUBING Y N (replaced) DUPLICATE: Y N	
ANALYSIS AND OD FOLIDATATE FOR	IPLE PUMP OW RATE
ID CODE CONTAINERS CODE VOLUME USED ADDED IN FIELD (mL) PH METHOD CODE (mL	per minute)
	500
1 PE NOWE AMONGO10	
REMARKS;	
MATERIAL CODES: AG = Amber Glass; CG = Clear Glass; PE = Polyethylene; PP = Polypropylene; S = Silicone; T = Teflon; O = Other (Spe	oify)
SAMPLING EQUIPMENT CODES: APP = After Peristaltic Pump; B = Bailer; BP = Bladder Pump; ESP = Electric Submersible Pump; RFPP = Reverse Flow Peristaltic Pump; SM = Straw Method (Tubing Gravity Drain); O = Other (Specify)	ony)

NOTES: 1. The above do not constitute all of the information required by Chapter 62-160, F.A.C.

2. STABILIZATION CRITERIA FOR RANGE OF VARIATION OF LAST THREE CONSECUTIVE READINGS (SEE FS 2212, SECTION 3)

pH: \pm 0.2 units Temperature: \pm 0.2 °C Specific Conductance: \pm 5% Dissolved Oxygen: all readings \leq 20% saturation (see Table FS 2200-2); optionally, \pm 0.2 mg/L or \pm 10% (whichever is greater) Turbidity: all readings \leq 20 NTU; optionally \pm 5 NTU or \pm 10% (whichever is greater)

Revision Date: February 12, 2009



APPENDIX B

Complete Laboratory Analytical Results



SPECTRUM ANALYTICAL, INC. Featuring HANIBAL TECHNOLOGY Florida Division



Florida # E84207 Texas # T104704408-10-2 South Carolina # 96011001 North Dakota # R-178



California Louisiana Kansas Arkansas # 07253CA # 02025 # E-10385 # 10-039-0

- CERTIFICATE OF ANALYSIS -

Report Date: 06/06/2011

To: Brian Moore
HSA Engineers & Scientists
4019 E Fowler Ave.
Tampa, FL 33617

Work 813-971-3882 FAX

PROJECT ID: Countryside Golf Course/601-5982-00

WORK ORDER: 3503031

DATE RECEIVED: Thursday, May 26, 2011

Project Notes:

(†): Short Hold Time Analysis Date

Samples reported on dry weight basis

All test results in this report pertain only to the samples as submitted.

Spectrum Analytical, Inc. FL Division Contact: Mark Gudnason / extension: 242
8405 Benjamin Road, Suite A• Tampa, Florida 33634
813-888-9507• FAX: 813-889-7128
Website: www.pelab.com

Spectrum Analytical, Inc. FL Division featuring Hanibal Technology

DATA QUALIFIER CODES

State of Florida, Department of Environmental Protection and Department of Health Rehabilitative Services / NELAC

- The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
- **J** Estimated value; value not accurate. This code shall be used in the following instances:
 - 1. Surrogate recovery limits have been exceeded.

L

- 2. No known quality control criteria exits for the component.
- 3. The reported value did not meet the established quality control criteria for either precision or accuracy but falls within the NELAC marginal exceedance range.
- 3M.The reported value did not meet the established quality control criteria for either precision or accuracy and falls beyond the NELAC range for marginal exceedances.
- 3R.The RPD for the LCSD exceeds the laboratory established control limits.
- 4. The sample matrix interfered with the ability to make an accurate determination.
- 5. The data is questionable because of improper laboratory or field protocols (e.g. composite sample was collected instead of a grab sample).
- Off-scale high. Actual value is known to be greater than the value given. To be used when the concentration of the analyte is above the acceptable limit for quantitation (exceeds the linear range of the highest calibration standard) and the calibration curve is known to exhibit a negative deflection.
- Sample held beyond acceptable holding time. This code shall be used if the value is derived from a sample that was prepared or analyzed after the approved holding time restrictions for the sample preparation or analysis.
- Indicates that the compound was analyzed for but not detected above the method detection limit (MDL).
- Indicates that the analyte was detected in both the sample and the associated method blank. Note: The value in the blank shall not be subtracted from associated samples.
- Y
 The laboratory analysis was from an unpreserved or improperly preserved sample.
 The data may not be accurate.

CASE NARRATIVE METALS

Spectrum Analytical Inc. Lab Reference No./SDG: 3503031

Client: HSA

I. RECEIPT

Exceptions encountered upon receipt are addressed in the Sample Receipt Confirmation Report, included with the Chain-of-Custody documentation, or communication included in the addendum with this package.

II. HOLDING TIMES

A. Sample Preparation: All holding times were met.

B. Sample Analysis: All holding times were met.

III. METHOD

Analyses were performed according to the Spectrum Analytical Inc. Standard Operating Procedures and EPA Method 6010B for ICP metals.

IV. PREPARATION

Water samples were prepared according to PEL Laboratory's Standard Operating Procedures and EPA Method 3010A.

V. ANALYSIS

A. Calibration:

All acceptance criteria were met.

B. Blanks:

1. Calibration Blanks:

All acceptance criteria were met.

2. Method Blanks:

All acceptance criteria were met.

C. Spikes:

1. Laboratory Control Spikes (LCS):

All acceptance criteria were met

2. Post Digestion Spike:

All acceptance criteria were met.

3. Matrix Spike/Matrix Spike Duplicate Samples (MS/SD):

CASE NARRATIVE METALS

Spectrum Analytical Inc. Lab Reference No./SDG: 3503031

Client: HSA

No spikes requested by client.

D. Duplicate:

No sample duplicates are reported with this method. (Spike duplicates are referenced above in section C. Spikes.)

E. Serial Dilution:

All acceptance criteria were met.

F. ICP Interference Check Samples:

All acceptance criteria were met.

G. Samples:

Sample analysis proceeded normally.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and Spectrum Analytical Inc., both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as, verified by the following signature.

Name: Troy L. Roberts Title: Inorg. Manage

SIGNED: DATE: 06/06/2011

CASE NARRATIVE METALS DISSOLVED

Spectrum Analytical Inc. Lab Reference No./SDG: 3503031

Client: HSA

I. RECEIPT

Exceptions encountered upon receipt are addressed in the Sample Receipt Confirmation Report, included with the Chain-of-Custody documentation, or communication included in the addendum with this package.

II. HOLDING TIMES

A. Sample Preparation: All holding times were met.

B. Sample Analysis: All holding times were met.

III. METHOD

Analyses were performed according to the Spectrum Analytical Inc. Standard Operating Procedures and EPA Method 6010B for ICP metals.

IV. PREPARATION

Water samples were prepared according to PEL Laboratory's Standard Operating Procedures and EPA Method 3010A.

V. ANALYSIS

A. Calibration:

All acceptance criteria were met.

B. Blanks:

1. Calibration Blanks:

All acceptance criteria were met.

2. Method Blanks:

All acceptance criteria were met.

C. Spikes:

1. Laboratory Control Spikes (LCS):

An LCS/LCSD set was analyzed.

All percent recovery and relative percent difference (RPD) criteria were met.

2. Post Digestion Spike:

All acceptance criteria were met.

3. Matrix Spike/Matrix Spike Duplicate Samples (MS/SD):

CASE NARRATIVE METALS DISSOLVED

Spectrum Analytical Inc. Lab Reference No./SDG: 3503031

Client: HSA

No spikes requested by client.

D. Duplicate:

No sample duplicates are reported with this method. (Spike duplicates are referenced above in section C. Spikes.)

E. Serial Dilution:

All acceptance criteria were met.

F. ICP Interference Check Samples:

All acceptance criteria were met.

G. Samples:

Sample analysis proceeded normally.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and Spectrum Analytical Inc., both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as, verified by the following signature.

Signature:

Name: Troy L. Roberts Title: Inorg. Manager

SIGNED:

DATE: 06/06/2011

FLDOH #E84207

To: Brian Moore WORK ORDER: 3503031

HSA Engineers & Scientists PROJECT ID: Countryside Golf Course/601-5982-00

Lab#: 350303101 Collection Information:

Client ID: MW-23 **Sample Date:** 5/26/2011 2:25:00 PM

Matrix: W

Parameter	Method	Results	Analysis Date	Prep Date	Units	MDL	RL	Dilution Factor
Arsenic	6010	3.31 U	06/03/2011 16:38	05/31/2011 11:30	UG/L	3.31	10	1
Arsenic	6010 DISS DISS	3.31 U	06/03/2011 19:50	05/31/2011 11:30	UG/L	3.31	10	1



To: Brian Moore

HSA Engineers & Scientists

WORK ORDER: 3503031

PROJECT ID: Countryside Golf Course/601-5982-00

QC SUMMARY

METHOD: 6010

Method Blank: 86713MB Matrix: WQ

Associated Lab Samples: 350303101 86713MB 86714LCS

		Analysis	Prep			Dilution	
Parameter	Results	Date	Date	Units	RL	Factor	
Arsenic	U	6/3/2011	5/31/2011	UG/L	3.31	1	

LABORATORY CONTROL SAMPLE: 86714LCS WQ Matrix: **SPIKE** LCS **SPIKE** % REC RPD **PARAMETER** UNITS CONC **RESULT** % REC LIMITS **RPD** LIMIT 500 477 95.4 Arsenic ug/L (80-120)

FLDOH #E84207

To: Brian Moore

HSA Engineers & Scientists

WORK ORDER: 3503031

PROJECT ID: Countryside Golf Course/601-5982-00

METHOD: 6010 DISS DISS

Method Blank: 86718MB Matrix: WQ

Associated Lab Samples: 350303101 86718MB 86719LCS 86720LCSD

Parameter	Results		nalysis Date	Prep Date	Unit	s	RL	_	Dilution Factor	
Arsenic	U	6/	3/2011	5/31/2011	UG/I	_	3.31		1	
LABORATORY CONTROL	SAMPLE:	86719	DLCS	Matri	x :	WQ				
		SPIKE	LCS	SPIKI	E	% REC			RPD	
PARAMETER	UNITS	CONC	RESUL	T % RE		LIMITS		RPD	LIMIT	
Arsenic	ug/L	500	447	89.4		(80-120))			
LABORATORY CONTROL	SAMPLE:	86720)LCSD	Matri	x :	WQ				
		SPIKE	LCS	SPIKI	Ξ	% REC			RPD	
PARAMETER	UNITS	CONC	RESUL	T % REG		LIMITS		RPD	LIMIT	
Arsenic	ug/L	500	428	85.6		(80-120)) 4	1.3	20	

FLDOH #E84207

To: Brian Moore

HSA Engineers & Scientists

WORK ORDER: 3503031

PROJECT ID: Countryside Golf Course/601-5982-00

Brian C. Spann Laboratory Manager

or

Mark Gudnason Technical Director



CHAIN OF CUSTODY RECORD

Special Handling: TAT- Indicate Date Needed:

All TATs subject to laboratory approval.

Min. 24-hour notification needed for rushes.

· Samples disposed of after 60 days unless otherwise instructed

A DIVISIONOL SPECIAL	M ANALY FIGAL, TMC, Feelining HANTBA	L TECHNOLOGY			P	age _		_ of .						oth	erwise ins	structed.	
	Brian Ma		Invoice 7 7019 Tan P.O. No.	1pc	FL		361	7_			Proj Site Loca Sam	ect No.: Name: ntion: <u>(</u> pler(s):	Cou Clean	ol- nto www oe	-598 yside later Orfa	z-00 e Golf Co nides	ourse ate: FL
1=Na ₂ S2O ₃ 2=HCl 3=H ₂ SO ₄ 4=HNO ₃ 5=NaOH 6 8= NaHSO ₄ 9= 10=											List preservative code below:				No	tes:	
O=Oil SW	ng Water GW=Gro = Surface Water Se X2= G=Grab C	O=Soil SL=Slu X3	dge A=Air] ×	/OA Vials	# of Amber Glass	of Clear Glass		Arsnic 6010	10 8610		alyses			☐ Level I	
Lab Id:	Sample Id:	Date: 5-26-11	Time: 1425	C Type	G-W Matrix	# of VOA	/ Jo #) Jo #	# of F	\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\	< Arsenic	:				State specific rep	oorting standards:
D.F. mail to					/) R/e	ZiA qu	ished	l løy:				Rece	eived b	by:		Date:	Time:
EDD Format	pH < 2 6010	pH >2			pl	h	M	l	-		M	y				526-11	IS40
Condition upo	on receipt: 🗖 Iced 🛭	Ambient W°C 4.	1														

SAMPLE RECEIPT CONFIRMATION SHEET

Client Information

SDG:	3503031		Req:	1310	
Client:	HSA		Project:	Generic	
Level:	1		Date Rec'd:	5/26/2011 3:40:00 PM	
Rec'd via:	Client		Due Date:	6/2/2011	
		Sample	Verification		
Samples/Cool	er Secure?	Yes	All Samples on CO	C accounted For?	Yes
Temperature of	of Samples(Celsius)	4.7C	All Samples Rec'd	ntact?	Yes
pH Verified?		Yes	Sample Vol. Suffici	ent For Analysis	Yes
pH WNL?		Yes	Samples Rec'd W/l	Hold Time?	Yes
Soil Origin (Do	omestic/Foreign):		Are All Samples to	be Analyzed?	Yes
Site Location/	Project on COC?	Yes	Correct Sample Co	ntainers?	Yes
Client Project	# on COC?	Yes	COC Comments wr	itten on COC?	Yes
Project Mgr. Ir	ndicated on COC?	Yes	Samplers Initials o	1 COC?	Yes
COC relinquis	hed/Dated by Client?	Yes	Sample Date/Time	Indicated?	Yes
COC Received	d/Dated by PEL?	Yes	TAT Requested:		STD
Specific Subc	ontract Indicated?	No	Client Requests Ve	rbal Results?	No
Samples Rece	eived By	Client	Client Requests Fa	xed Results?	No
PEL to Condu	ct ALL Analyses?	Yes			
Radioactivity	Check?	No			
COC Present?	?	Yes			

	4
PEER REVIEW	

End Of Report

060611 1039