



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 3, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. S. Lee Crouch
Executive Corporation of Clearwater, Inc.
5260 South Landing Dr., Suite 704
Fort Myers, Florida 33919

Re: Site Assessment - Countryside Executive Golf Course
2506 Countryside Blvd.
Clearwater, Pinellas County, Florida
FDEP Project # 295342

Dear Mr. Crouch:

The State of Florida Department of Environmental Protection ("Department") possesses information that indicates contaminants may have been released or discharged into the environment at 2506 Countryside Blvd. Clearwater, Florida ("site"). On April 17, 2005, through authority granted by Chapter 376.30701, Florida Statutes ("F.S."), the Department adopted Chapter 62-780, Florida Administrative Code ("F.A.C."), establishing a process and time schedule for the assessment and remediation of contaminated sites. All persons who have legal responsibility for site rehabilitation, pursuant to Chapters 376 or 403, F.S., are required to comply with the provisions of this rule and are subject to enforcement to compel such compliance. A potentially responsible party is required by Chapter 62-780, F.A.C., to initiate a site assessment within 60 days of discovery of the contamination and to submit a site assessment report to the Department within 270 days of discovery of the contamination. As a potentially responsible party at the above-identified site, you may be subject to the requirements for assessment and remediation of such contamination under Chapter 62-780, F.A.C. It is the Department's intention to initiate formal enforcement against responsible parties that do not comply with the requirements of Chapter 62-780, F.A.C.

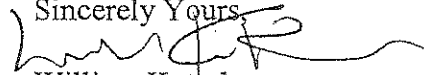
The Department has reviewed the documents submitted for the above referenced site including the Site Assessment Report (SAR) and subsequent addendums to the SAR prepared by HSA Engineers & Scientists (HAS) on behalf of Beazer Homes. The reports document that soil and groundwater at the site contains arsenic at concentrations that exceed Soil and Groundwater Target Cleanup Levels (SCTLs and GCTLs) as established in Chapter 62-777, F.A.C.

To date, site assessment has not been completed to meet the requirements of Chapter 62-780, F.A.C. Soil and groundwater at the site must be fully delineated to determine the horizontal and vertical extent of contamination in excess of the Cleanup Target Levels. This includes going off-property as necessary to complete the delineation.

Please submit a Site Assessment Report Addendum within 120 days of receipt of this letter or by December 4, 2007. The groundwater and soil data collected to date by HSA Engineers and Scientists may be incorporated in the report, but additional assessment is needed to fulfill the requirements of the Rule. A Site Assessment Report Checklist is enclosed to help you and your consultant to meet all of the requirements of Rule 62-780.600 F.A.C.

If the Department concludes that you are a responsible party for site conditions, requiring you to comply with the obligations of Chapter 62-780, F.A.C., then failure to submit a SARA within 120 days of receipt of this letter or by December 4, 2007, may subject you to a formal enforcement action to compel such compliance. If you have any questions regarding the Chapter 62-780, F.A.C. requirements outlined above, please contact Bob Sellers by email at Robert.sellers@dep.state.fl or by phone at (813) 632-7600 ext.373.

Sincerely Yours,



William Kutash

Waste Management Administrator

Enclosure: Site Assessment Checklist

cc: Jason Sherman, OGC
Helen Sarver, Registered Agent, Executive Corp. of Clearwater, Inc.,
11691 Gateway Blvd. # 203 Fort Meyers, Florida 33413

The Site Assessment Report shall:	
(a) Summarize all tasks that were completed pursuant to subsections 62-780.600(3), (4) and (5), F.A.C., and summarize the results obtained. All maps shall indicate the North direction, be drawn to scale, and include a graphical representation of the scale used.	
All of the items checked off on the following list from the Site Assessment Report requirements of Chapter 62-780.600 are not included in the report submitted to the Department, or are deficient as noted.	
1. A detailed summary of site history and operations, including:	
	Submitted
a. An identification of present real property and facility owners;	
b. A description of past and present operations, including those that involve the storage, treatment, use, disposal, processing, or manufacture of materials that may be potential contaminant sources;	
c. A description of all known products used or manufactured and of all by-products and wastes (including waste constituents) generated during the life of the facility;	
d. A summary of current and past environmental permits and enforcement actions; and	
e. A summary of known spills or releases of materials, including permitted releases, that may be potential contaminant sources;	
Comments:	
2. A copy of the portion of the most recent USGS topographic map(s), including quadrangle name and scale with contour interval(s) labeled, that clearly identifies the site in relation to the surrounding area;	
	Submitted
a. USGS topographic map?	
b. Quadrangle name	
c. Scale	
d. Contour interval(s)	
Comments:	
3. A vicinity map that shows pertinent features, such as local drainage features, land cover, property boundaries, supply wells and, particularly, any potential off-site sources of contamination identified during the assessment. If the subject site meets the No Further Action criteria of subsection 62-780.680(1), F.A.C. (<i>Risk Management Option Level I</i>); a vicinity map is not required;	
	Submitted
a. Local drainage features	
b. Land cover	
c. Property boundaries	
d. Supply wells	
e. Any potential off-site sources of contamination identified	
Comments:	
4. One or more scaled site maps that show pertinent surface and subsurface	

features present in the immediate vicinity of the contamination	
	Submitted
a. Buildings	
b. Utilities	
c. Sewers	
d. Floor drains	
e. Drain lines	
f. Above and underground structures	
g. Storage areas	
Comments:	
5. A map of individual contaminant discharge locations, including the latitude and longitude coordinates of the known discharge locations.	
	Submitted
a. Location	
b. Latitude and longitude	
Comments:	
6. Details of any preliminary assessment or interim source removal activities performed at the site, such as free product recovery, groundwater recovery, contaminated soil removal, and contaminated sediment removal (summarized in graphical and tabular form);	
	Submitted
a. Preliminary Assessments	
b. Free product recovery	
c. Groundwater recovery	
d. Contaminated soil removal	
e. Contaminated sediment removal	
Comments:	
7. Data and calculations used to determine the top-of-casing elevations and the accuracy of the survey performed pursuant to paragraph 62-780.600(5)(j), F.A.C. (<i>top-of-casings surveyed to NGVD of 1929 or NAVD of 1988</i>);	
	Submitted
NGVD of 1929 or NAVD of 1988 validated?	
Comments:	
8. Tables that list the top-of-casing elevations, screened intervals, depths to groundwater, water-level elevations obtained at least twice, at least one month apart, and the dates the data were obtained;	
	Submitted
a. Table listing monitoring well and ground water elevation data	
b. Top-of-casing elevations	
c. Screened intervals	
d. Depths to groundwater	
e. Water-level elevations obtained at least twice, at least one month apart	
Comments:	

Draft SAR Checklist

ATTACHEMENT : 62-780 Site Assessment Checklist

Page 3 of 8

Site:

9. Scaled site maps that illustrate the water-level elevations calculated at each monitoring well, piezometer, and staff gauge where surface water is a concern, and depicting the estimated elevation contours and an interpretation of groundwater flow direction. If different strata of the same aquifer, or if different aquifers, are affected, separate figures shall be submitted for each date on which measurements were recorded, depicting flow in each stratum or aquifer. If the site's groundwater is tidally-influenced, separate figures shall be submitted depicting flow at high and low tide. If the site is affected by seasonal groundwater variations, separate figures shall be submitted depicting the seasonal changes in the groundwater flow direction;	
	Submitted
a. Scaled site map(s)	
(1) Illustrate the water-level elevations	
(2) Depict the estimated elevation contours and an interpretation of groundwater flow direction.	
b. Separate figures submitted for each date on which measurements were recorded, depicting flow in each stratum or aquifer.	
(1) Separate figures submitted for each date on which measurements were recorded	
(2) Different strata of the same aquifer	
(3) Different aquifers	
c. Separate figures submitted depicting flow at high and low tide if the site's groundwater is tidally-influenced	
Comments:	
10. A table that summarizes the use and well construction details, if available, and locational information (i.e., the nearest street address, if available, or latitude and longitude coordinates, if the street address is not available), of all the water supply wells identified during the well survey performed pursuant to paragraph 62-780.600(3)(h), F.A.C. (<i>requirements for well survey</i>);	
	Submitted
a. Well survey	
b. Table summarizes the use and well construction details for water supply wells identified during the well survey.	
c. Locational information.	
(1) Nearest street address, or	
(2) Latitude and longitude coordinates	
Comments:	
11. A map that shows the approximate location(s) of the water supply well(s) identified during the well survey performed pursuant to paragraph 62-780.600(3)(h), F.A.C., in relation to the subject site;	
	Submitted
a. A map shows approximate location(s) of the water supply well(s) identified during the well survey	
Comments:	
12. The results from slug tests on a minimum of three monitoring wells or from a pumping test, performed in each affected aquifer zone monitored to determine aquifer properties, and including a description of methods used, assumptions made, field data, and calculations, unless the site meets the No Further Action criteria of subsection 62-780.680(1), F.A.C. (<i>Risk Management Option Level I</i>);	

XX = Deficiency – see "Comments"; ok = No comments; TBA = To be addressed; NA = Not Applicable - see "Comments"

	<u>Submitted</u>
a. Site meets the No Further Action criteria	
b. Slug tests on a minimum of three monitoring wells performed in each affected aquifer zone	
c. Pumping test performed in each affected aquifer zone	
d. Description of methods used	
e. Field data	
f. Calculations	
Comments:	
13. The result of a calculation of horizontal groundwater flow velocity (v) for the site, using the formula $v=KI/n$, where K is the average horizontal hydraulic conductivity, I is the average horizontal hydraulic gradient, and n is the estimated effective soil porosity, unless the site meets the No Further Action criteria of subsection 62-780.680(1), F.A.C. (<i>Risk Management Option Level I</i>);	
	<u>Submitted</u>
a. Site meets the No Further Action criteria	
b. Horizontal groundwater flow velocity calculated using the formula $v = KI/n$	
c. K is the average horizontal hydraulic conductivity =	
d. I is the average horizontal hydraulic gradient =	
e. n is the estimated effective soil porosity =	
Comments:	
14. The result of a calculation of vertical groundwater flow velocity (v) for the site, using the formula $v = KI/n$, where K is the average vertical hydraulic conductivity of a confining or semi-confining zone, I is the average vertical hydraulic gradient, and n is the estimated effective soil porosity, unless the site meets the No Further Action criteria of subsection 62-780.680(1), F.A.C. (<i>Risk Management Option Level I</i>);	
	<u>Submitted</u>
a. Site meets the No Further Action criteria	
b. Vertical groundwater flow velocity calculated using the formula $v = KI/n$	
c. K is the average vertical hydraulic conductivity =	
d. I is the average vertical hydraulic gradient =	
e. n is the estimated effective soil porosity =	
Comments:	
15. A description of any geophysical methods used for the project;	
Comments:	
16. A description of the site-specific stratigraphy, based on the lithologic logs prepared during soil assessment and monitoring well installation and on standard penetration test borings (including composition, thickness, and continuity of various lithologic units);	
	<u>Submitted</u>
(a) A description of the site-specific stratigraphy for the project are based on:	
1. Lithologic logs prepared during soil assessment	
2. Monitoring well installation	
3. Standard penetration test borings	
4. Describes composition of lithologic units	

5. Describes thickness of lithologic units	
6. Describes continuity of lithologic units	
<u>Comments:</u>	
17. At least two cross-sections relative to NGVD of 1929 or NAVD of 1988 that illustrate the site-specific stratigraphy and approximate concentrations of applicable contaminants;	
	<u>Submitted</u>
(a) Two cross-sections relative to NGVD of 1929 or NAVD of 1988	
1. Illustrate the site-specific stratigraphy	
2. Illustrate approximate concentrations of applicable contaminants	
<u>Comments:</u>	
18. Details of any other assessment methodology used at the site, including any field screening techniques and measures of biological activity (for example, dissolved oxygen or nutrient levels);	
	<u>Submitted</u>
(a) Other assessment methodology used at the site	
1. Hydrologic measurements:	
a. Volume purged (gallons)	
b. Purge rate (gpm)	
c. Depth to water (feet)	
d. pH	
e. Temperature	
f. Conductivity	
g. Color	
h. Odor	
i. Turbidity	
<u>Comments:</u>	
19. A table that summarizes the field soil screening results obtained at each sampling location and depth, and a listing of the date(s) the work was performed;	
	<u>Submitted</u>
(a) Table summarizes field soil screening results:	
(b) Results annotated for each sampling location	
(c) The depth at each sampling location is recorded	
(d) Listing of the date(s) the work was performed	
<u>Comments:</u>	
20. One or more scaled site maps that show all soil sampling locations for field screening or laboratory analyses and that illustrate the horizontal and vertical extent of unsaturated zone soil contamination when soil contamination is detected;	
	<u>Submitted</u>
1. One or more site maps show all soil sampling locations	
a. Map to scale?	

Site:

b. Show all soil sampling locations for field screening	
2. Show all soil sampling locations for laboratory analyses	
3. Iso-contour maps for each constituent of concern (COC)	
4. Illustrate the horizontal extent of unsaturated zone soil contamination for each COC	
5. Illustrate the vertical extent of unsaturated zone soil contamination for each COC	
Comments:	
21. Piezometer, monitoring well, and recovery well construction details and construction diagrams, including methods and materials, field sampling data sheets, lithologic logs, and methods and volumes of groundwater removed during well development;	
	Submitted
(a) Piezometer, monitoring well, and recovery well diagrams completed	
(b) Construction methods	
(c) Construction materials	
(d) Field sampling data sheets	
(e) Lithologic logs	
(f) Methods of groundwater removed during well development	
(g) Volumes of groundwater removed during well development	
Comments:	
22. A description of the treatment or disposal methods of any investigation-derived waste generated during the assessment phase and any documentation that confirms the proper treatment or proper disposal of the waste, as applicable;	
	Submitted
a. IDW discussed?	
Comments:	
23. A table that is updated any time additional piezometers, monitoring wells, or recovery wells are installed and that summarizes the well construction details (including the top-of-casing elevation referenced to NGVD of 1929 or NAVD of 1988, depth of the top of the screen below land surface, total depth and screen length, and ground surface elevation referenced to NGVD of 1929 or NAVD of 1988) of all monitoring wells (including storage tank compliance wells or other compliance wells required by permit), piezometers, and recovery wells;	
	Submitted
a. Table updated?	
Comments:	
24. A current table that summarizes free product thickness measured, volumes recovered, and date(s) measurements were recorded, if applicable;	
	Submitted
a. Free Product Table?	
Comments:	
25. A scaled site map that shows the estimated horizontal extent of free product;	

Draft SAR Checklist

ATTACHEMENT : 62-780 Site Assessment Checklist

Page 7 of 8

Site:

	<u>Submitted</u>
a. Horizontal Free Product map?	
26. All applicable information required by subsection 62-780.300(2), F.A.C. (<i>Quality Assurance requirements for data submitted</i>);	
a. QA/QC Submitted?	<u>Submitted</u>
Comments:	
27. Separate tables by medium (soil, sediment, groundwater, and surface water)	
a. Separate tables by medium (soil, sediment, groundwater, and surface water)	<u>Submitted</u>
b. List all contaminants detected	
c. Their corresponding CTLs	
d. Basis or reason for any alternative CTLs	
e. Detection limits achieved for non-detected analytes	
f. Analyses performed, and that summarize all available analytical results	
Comments:	
28. One or more scaled site maps that show any areas excavated and all groundwater and surface water sampling locations	
a. One or more scaled site maps show:	<u>Submitted</u>
b. Maps to scale?	
c. Any areas excavated	
d. All groundwater sampling locations	
e. Iso-contour maps for each constituent of concern (COC)	
f. Illustrate the horizontal extent of unsaturated zone soil contamination for each COC	
g. Illustrate the vertical extent of unsaturated zone soil contamination for each COC	
h. All surface water sampling locations	
i. Illustrate the extent of surface water contamination using sufficient iso-concentration lines to help identify source area(s) as well as the extent of the plume(s).	
Comments:	
(b) Summarize conclusions regarding site assessment objectives outlined in subsection 62-780.600(3), F.A.C., and include one of the following:	
1. A No Further Action Proposal without institutional controls or without institutional and engineering controls shall be included if the site meets the applicable No Further Action criteria of subsection 62-780.680(1), F.A.C., or a No Further Action Proposal with institutional controls or both institutional and engineering controls may be included if the site meets the applicable No Further Action criteria of subsection 62-780.680(2) or (3), F.A.C.;	
a. NFA Proposal without institutional controls or without institutional and engineering controls submitted?	<u>Submitted</u>
Comments:	

XX = Deficiency – see “Comments”; ok = No comments; TBA = To be addressed; NA = Not Applicable - see “Comments”

Site:

2. A Natural Attenuation with Monitoring Plan may be included if the site meets the Natural Attenuation with Monitoring criteria of Rule 62-780.690, F.A.C.;	
	Submitted
a. NAMP submitted?	
Comments:	
3. A recommendation to prepare a risk assessment or a Risk Assessment work plan shall be included if the PRSR chooses to justify alternative CTLs using risk assessment studies demonstrating that human health, public safety, and the environment are protected to at least the same degree provided by the CTLs referenced in this chapter. The work plan shall include a schedule for completion of a risk assessment and documentation adequate to support the request to do one or more of the task elements of subsection 62-780.650(1), F.A.C., and shall specify the parameters or exposure assumptions that will be used to develop the alternative CTLs pursuant to Rule 62-780.650, F.A.C.; or	
	Submitted
a. A recommendation to prepare a risk assessment or a Risk Assessment work plan submitted?	
Comments:	
4. A recommendation to prepare a Remedial Action Plan pursuant to Rule 62-780.700, F.A.C., shall be included, unless a recommendation pursuant to subparagraph 62-780.600(8)(b)1., 2., or 3., F.A.C., is included.	
	Submitted
a. A recommendation to prepare a Remedial Action Plan submitted?	
Comments:	