

Gus Olmos

From: Vaught,Tracie <Tracie.Vaught@dep.state.fl.us>
Sent: Friday, December 13, 2019 12:24 PM
To: Kelly Fifer; W. Russell Kestle Jr (kestle.rusty@epa.gov); Vaught,Tracie
Cc: Scott Miller (miller.scott@epa.gov); 'Reiber, Wayne'; Robert Rule; Mark Taylor (mark.taylor@westonsolutions.com); Steven Poirier; CElder@Geosyntec.com; Manu Sharma (MSHARMA@gradientcorp.com); Meghna Swamy (MSwamy@gradientcorp.com); Hutton, Richard H; Robin Hallbourg; Gus Olmos; Ted Goodman; 'bcotter@waterandair.com'
Subject: RE: Cabot Carbon - Monthly Reports
Attachments: November Progress Rpt.pdf; October Progress Rpt.pdf; Dashboard-1_Cabot-Air-Sampling-Results-Through-11-21-19-Printable.xlsx; RE: Cabot Carbon - Stormwater Calculations for Zero Discharge Pond

The department would like to know when our comments, that are listed below, will be addressed. I have provided them again, see below, for your information.

The department has reviewed the Stormwater Design Modifications document and we have the following comments:

1. The document states in the 2nd page 2nd paragraph “*Stockpiled soil intended to be used as fill after demolition of the City’s stormwater pond will be returned as fill in the replacement pond and will be covered by a minimum of 1 foot of clean fill*”. The department cannot concur with just 1 foot of clean fill Pursuant to 62-780 Florida Administrative Code Risk Management Options Level II. The rule states that 2 feet of clean fill need to be placed on top of the contaminated soil.
2. All soil alternatives, with the exception of the No Action alternative, would be protective of human health and the environment. SS-4 would reduce leaching of COCs into groundwater and eliminate exposure to human and ecological receptors by removing the largest volume of contaminated soil and reducing stormwater infiltration into contaminated soil. Alternatives SS-2, SS-3, SS-5, SS-6 and SS-7 would also reduce leaching and eliminate direct contact exposure by use of the low-permeability cap and ICs.
3. In the email dated, November 14, 2019, which states that only soil that is not showing a visual impact will be returned to the new stormwater pond is not adequate. Laboratory analysis is required to determine if that soil is contaminated or not.

The department suggests that the material that will be put back into the new stormwater pond be properly lined both on the bottom and the cover with impermeable materials.

4. If the fill that is being put back into the new stormwater pond is clean fill, the department would need to see the documentation to support this statement that this is actually “clean fill”. If it is not clean fill maybe placing contaminated soil into a stormwater pond of the state, please refer to the statute below:
“376.302 *Prohibited acts; penalties.*—
(1) *It shall be a violation of this chapter and it shall be prohibited for any reason:*
(a) *To discharge pollutants or hazardous substances into or upon the surface or ground waters of the state or lands, which discharge violates any departmental “standard” as defined in s. 403.803(13).*” If

Cabot is using the contaminated soil that was originally excavated, the department cannot concur per this action.

5. These changes are substantial which require the changes submitted in a revised 100% design report that is sealed by a professional engineer.



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