

TO: Chris Stahl, Environmental Specialist III
Office of Intergovernmental Programs

FROM: Paul Wierzbicki, P.G., Waste Cleanup Supervisor
Southeast District

DATE: February 16, 2006

PROJECT: **State Clearinghouse Comments**
Department of Transportation – Advance Notification – South Florida East Coast
Corridor Transit Analysis (SFECCTA), Financial Management No. 417031-1-22-
01 – Miami-Dade, Broward and Palm Beach Counties, Florida.
SAI # FL200601271848C

The Department's Southeast District, Waste Cleanup Section offers the following comments:

1. According to the Executive Summary, the scope of this study is "to develop and analyze alternatives that potentially integrate passenger and freight transport along the SFECCTA study area; a regional corridor in the southeast Florida Tri-County area that is centered along the Florida East Coast Railway (FEC). This study will not exclusively consider the railway as a preferred alignment or rail as a preferred technology. Right-of-way on streets and areas parallel to the FEC Railway, as well as stretches of waterways, will be evaluated for alternative transit routes and technologies (including but not limited to bus, waterway transit, light-rail, commuter rail and heavy-rail technologies)." The Advance Notification presents existing conditions and estimates of future projected conditions within a generally two-mile wide area centered on the existing FEC Railway along approximately 85 miles, north to south (of the total FEC Railway 351 mile length) between Downtown Miami in Miami-Dade County to just north of the Town of Jupiter in Palm Beach County.

2. Based on a review of National Priority List (NPL) / Superfund Sites, Solid Waste / Dump Site, Brownfield, and Underground Storage Tank (UST) GIS data layers publicly available from the Florida Geographic Data Library, approximately 3,150 potential contamination sites and 160 hazardous materials sites are potentially present throughout the entire SFECCTA project study area. In addition, GIS records from the Miami-Dade County Department of Environmental Resources Management (DERM) indicate 691 potential contamination sites and 7,819 permitted sites with the Miami-Dade County portion of the study area alone. The Eastward Ho! Growth Management Policy Program is referenced on Page 37 in the Economic Growth and Development Section.

Further, the Advance Notification states that a more detailed Contamination Screening Evaluation (similar to Phase I and Phase II Audits) will be conducted to be performed for this project. If the screening evaluations utilize current or historical records and reasonably current file data, or establish new data points to identify potential soil and groundwater contamination

areas, the data should be acceptable for use in the Screening Evaluations. Copies of the screening evaluations should be supplied to the DEP Southeast District Office-Waste Cleanup Section, Miami-Dade County DERM, Palm Beach County Environmental Resources Management, Palm Beach County Health Department and Broward County Environmental Protection Department.

3. Groundwater monitoring wells are likely present along and near the entire length of the project. Arrangements need to be made to properly abandon (in accordance with Chapter 62-532, Florida Administrative Code) and or replace any wells that may be destroyed or damaged during construction.

4. Section 5.k. of the Advance Notification Fact Sheet, "Sole Source Aquifer", states that the project area falls within the limits of the Biscayne Aquifer. This is a "sole source" aquifer in part of Palm Beach, Broward and Miami-Dade Counties. Also, there are numerous public supply wellfields in the project boundaries, with probably hundreds of water production wells (irrigation, potable, industrial).

5. In the event contamination is detected during construction, the DEP, Miami-Dade County DERM, Palm Beach County Environmental Resources Management, Palm Beach County Health Department and Broward County Environmental Protection Department need to be notified (depending on the county) and the FDOT may need to address the problem through additional assessment and/or remediation activities. Reference should be made to the most recent FDOT specification entitled "Section 120 Excavation and Embankment -- Subarticle 120-1.2 Unidentified Areas of Contamination of the Standard Specifications for Road and Bridge Construction" in the project's construction contract documents that would require specific actions by the contractor in the event of any hazardous material or suspected contamination issue arises.

6. Depending on the findings of the Contamination Screening Evaluations, construction project segments involving "dewatering" should be discouraged or limited, since there is a potential to spread contamination to previously uncontaminated or less contaminated areas and affect contamination receptors, site workers and the public. Dewatering projects would require permits / approval from the South Florida Water Management District-Water Use Section and coordination with the Miami-Dade County DERM, Palm Beach County Environmental Resources Management, Palm Beach County Health Department and Broward County Environmental Protection Department (depending on location).

7. Any land clearing or construction debris must be characterized for proper disposal. Potentially hazardous materials must be properly managed in accordance with Chapter 62-730, F.A.C. In addition, any solid wastes or other non-hazardous debris must be managed in accordance with Chapter 62-701, F.A.C.

8. Please be advised that a new rule, 62-780, F.A.C., became effective on April 17, 2005. In addition, Chapters 62-770, 62-777, 62-782 and 62-785, F.A.C., were amended on April 17, 2005

to incorporate recent statutory changes. Depending on the findings of the environmental assessments, there are "off-property" notification responsibilities potentially associated with this project. These rules may be found at the following website: <http://www.dep.state.fl.us/waste/>

9. Based on our experience, the accurate identification, characterization and cleanup of sites requires experienced consulting personnel and laboratory support, management commitment of the project developers and their representatives, and will likely be very time-consuming. Early planning to address these issues is essential to meet construction and cleanup (if required) timeframes. Innovative technologies, such as special storm water management systems, engineering controls and institutional controls, such as conditions on water production wells and dewatering restrictions, may be required, depending on the results of environmental assessments.

10. Staging areas, with controlled access, should be planned in order to safely store raw material paints, adhesives, fuels, solvents, lubricating oils, etc. that will be used during construction. All containers need to be properly labeled. The project managers should consider developing written construction Contingency Plans in the event of a natural disaster, spill, fire or environmental release of hazardous materials stored / handled for the project construction.

In addition, the Southeast District, Air Resource Management Section offers the following comment:

The study states that "Air quality impacts will be assessed by collecting data on sensitive receptors such as residential, schools, parks, hospitals, pedestrian/bicycle facilities, and others." What air pollutants will be collected and how many sites will be utilized? Will there be any air quality modeling done to determine future air impacts?