



# FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office  
13051 North Telecom Parkway #101  
Temple Terrace, Florida 33637-0926

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

April 17, 2024

VIA EMAIL ONLY: [Putter@collierenterprises.com](mailto:Putter@collierenterprises.com)

Mr. Patrick Utter  
Collier Land Holdings, LTD.  
999 Vanderbilt Beach Road #507  
Naples, Florida 34108

Re: Site Summary Report  
Rivergrass II Redevelopment  
Naples, Collier County, Florida  
FDEP Facility ID # ERIC\_18563

Dear Mr. Patrick Utter

The Florida Department of Environmental Protection (Department) has reviewed the Site Assessment Report prepared by Geosyntec Consultants, Inc., dated and received April 1, 2024, for the site referenced above. The Department has the following comment on the above-referenced document:

- 1.) The Department does not concur with the recommendation for no further assessment.
- 2.) Groundwater: Laboratory analytical results for reported concentrations for total arsenic at MW-2 exceeding Groundwater and Surface Water Cleanup Target Levels.
  - a. However, laboratory analytical results of surface water sampled collected post construction at the cattle pond reported all contaminants of concern below surface water cleanup criteria.
  - b. Please include laboratory analytical results of surface water sampling of the new cattle pond in future reports.
  - c. Please sample the cattle pond for laboratory analysis for total arsenic and total iron. Following two consecutive sampling events not exceeding surface water criteria, no further monitoring of surface water will be required.
- 3.) Soil: Horizontal and vertical delineation of soils does not appear complete.
  - a. Laboratory analytical results reported arsenic at CS-10 exceeding RSCTLs for arsenic from 0.5-1 feet below land surface (ft bls).
  - b. Near the cattle pond, the depth to water for the most recent sampling event was reportedly greater than 4 ft bls. Excavation was completed to 0.5-1 ft bls; however, no confirmatory samples were collected at the bottom of the excavation.
- 4.) Please include all soil sampling results in the table for future reports.
- 5.) Please clarify what data and calculations were used to determine the top-of-casing elevations. Top-of-casing surveys must be performed pursuant to paragraph 62-780.600(5)(j), F.A.C. (*surveyed to National Geodetic Vertical Datum (NGVD) of 1929 or (North Geodetic Vertical Datum (NAVD) of 1988).*

Mr. Patrick Utter

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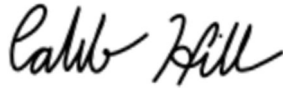
- 6.) Please include scaled site maps that illustrate the water-level elevations calculated at each monitoring well, piezometer, and staff gauge where surface water is a concern, and depicting the estimated elevation contours and an interpretation of groundwater flow direction.

Please submit a Supplemental Site Assessment Report by June 30, 2024. If you find you are unable to submit the document by the specified date, please request a time extension in accordance with Rule 62-780.790, F.A.C., including a detailed explanation for the requirement for the time extension. The time extension request shall be received by the Department at least 20 days prior to the time the action is to be initiated. The failure of the Person Responsible for Site Rehabilitation to submit requested information or meet any time frame herein shall be a violation of Chapters 376 and 403, Florida Statute (F.S.), and shall be enforceable by the Department pursuant to Sections 376.303 and 403.121, F.S., unless otherwise addressed by a Cleanup Agreement Document.

Should you have any questions or concerns, please contact me by telephone at (813) 470-5762, or by email to [caleb.w.hill@floridadep.gov](mailto:caleb.w.hill@floridadep.gov).

In an effort to reduce costs and waste, the agency is requesting all future submittals be sent in electronic format. Please reference the FDEP Site No. ERIC\_18563 in all your correspondence.

Sincerely,



Caleb Hill, Engineering Specialist  
Permitting and Waste Cleanup Program  
Southwest District

cc: Ryan Tuttle, Geosyntec, (via email: [RTuttle@Geosyntec.com](mailto:RTuttle@Geosyntec.com))  
Jim Linton, Geosyntec, (via email: [JLinton@Geosyntec.com](mailto:JLinton@Geosyntec.com))