MIAMI-DADE

DERM
DEPARTMENT OF ENVIRONMENTAL RESOURCES MANAGEMENT

MEMORANDUM

TO: Gary Dellapa, Director
Aviation Department
Miami-Dade County

DATE: August 25, 1998

FROM: John W. Renfrow, P.E., Director
Department of Environmental Resources Management
Miami-Dade County

SUBJECT: MIA Schedule of Compliance

FLD 980709075

DERM has reviewed the proposed MIA Schedule of Compliance dated July 27, 1998. At this time, we hereby disapprove the proposed Schedule for the following reasons:

1. DERM does not concur with the timeframes presented in the Schedule for the cleanup of non-IPTF and non-hazardous sites.
2. Completion of RCRA determinations by the FDEP is expected in the near future. This would allow the addition of these sites, determined to be non-RCRA, to the Schedule of Compliance.
3. The forthcoming determination of IPTF eligibility for the "non-agreement" locations as stated in Appendix B of the Consent Order, would allow the addition of these sites to the Schedule of Compliance.
4. Clarification of the applicability of RBCA protocols to IPTF and non-IPTF sites at MIA based on the review of the most recent review of the RBCA Report & Protocol document is also forthcoming.

Upon completion of these determinations or clarifications, DERM and the FDEP will coordinate a formal response to the proposed MIA Schedule of Compliance. We expect to provide this response to MDCAD within thirty (30) days.

If you have any questions concerning the above, please contact Curt L.A. Williams or me at (305) 372-6754.

Pc: Carlos Rivero-deAguilar – FDEP
Vivek Kamath – FDEP

9/1

DERM
DEPARTMENT OF ENVIRONMENTAL RESOURCES MANAGEMENT

cc: Rand

AIRPORTS SECTION

33 S.W. 2 Avenue, Suite 800
Miami, FL 33130-1540

Fax Cover Sheet

DATE: 8/28/98 TIME: 1025 am

TO: Vik Kamath PHONE: (561) 681-6672
FDEP, WPB FAX: (561) 681-6770

FROM: Curt Williams PHONE: 372-6885
Airports Section FAX: 372-6982

RE: MIA Schedule of Compliance

Number of pages including cover sheet: two (2)

MESSAGE:
Vik, we decided to send a memo to DCAD re: our concerns and extending our response an additional thirty (30) days. This gives us (DERM & FDEP) some time to settle RCRA / RBCA / non-IPTF issues.
cw

METROPOLITAN DADE COUNTY, FLORIDA

METRO-DADE

AVIATION DEPARTMENT
P.O. BOX 592075
MIAMI, FLORIDA 33159-2075
(305) 876-7000

September 1, 1998

Mr. James J. Marshall
Senior Environmental Scientist
Field Engineering Division
South Florida Water Management District
P.O. Box 24680
West Palm Beach, FL 33416-4680

RE: Monthly Outfall Surface Water Sampling Report
July, 1998
Permit (MOD) No. 13-00053S
Miami International Airport

Dear Mr. Marshall:

Enclosed please find the above referenced report, in accordance with the Special Conditions of our Permit. The sampling event described in this report took place on July 9, 1998.

If you should have any questions or need additional information, please call me or Nancy Pantoja at (305) 876-7489.

Sincerely,

Pedro F. Hernandez, P.E., Manager
Environmental Engineering Division

PFH/LMW/lmw
w/enclosure

cc: Nancy Pantoja, DCAD
Curt L.A. Williams, DERM - with attachment
Dorian Valdes, DERM - with attachment
Eduardo Lopez, SFWMD - with attachment
Vik Kamath, FDEP
Raul Alonso, FDEP - with attachment
Luis Lopez-Blazquez, DAC
Fabio Foti, Ecology & Environment

MIAMI-DADE

DERM
DEPARTMENT OF ENVIRONMENTAL RESOURCES MANAGEMENT

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Pc: Carlos Rivero-deAguilar – FDEP
Vivek Kamath – FDEP

Florida Department of

Memorandum **Environmental Protection**

cc: Raul 8/12

Please review and coordinate response with DERM.
VK
8/12

TO: Vivek Kamath, Southeast District Office

THROUGH: Jim Crane, Technical Review Section, BWC

FROM: Ligia Mora-Applegate, Technical Review Section, BWC

DATE: August 10, 1998

SUBJECT: **RBCA Report and Protocol**
Chapters 6 and 7
Non Petroleum Sites
Miami International Airport (MIA)
Miami, Dade County, Florida

I have reviewed the subject document and the comments provided by Drs. Stephen Roberts and Christine Halmes (UF toxicologists on contract to FDEP) for Petroleum Sites. I concur with their comments especially the ones regarding Fraction from the Contaminated Source (FC) and recommend that they be addressed in their entirety. Since both proposals (Petroleum and Non Petroleum) are virtually identical, the comments from UF are applicable to both type of sites. For Non Petroleum, additivity needs to be considered (see my memorandum dated May 19,1998). In addition, I would like to add the following:

Regarding the construction worker scenario and due to the difficulty in justifying very short term exposure durations and exposure frequencies when calculating SCTLs based on carcinogenicity, the Department has opted to rely on institutional/engineering controls for those areas where the health risk from exposure to contaminated soil is only from short term exposures. For this situation, the deed restriction will also need to stipulate that if subterranean construction activities are ever implemented on the site, construction workers will be notified that contamination exists and that they need to use appropriate protective clothing/equipment based on OSHA requirements.

Attachment

cc: Tim Bahr

lm-a

UNIVERSITY OF FLORIDA

Center for Environmental & Human Toxicology

P.O. Box 110885
Gainesville, Florida 32611-0885
Tel.: (352) 392-4700, ext. 5500
Fax: (352) 392-4707

July 28, 1998

Ligia Mora-Applegate
Bureau of Waste Cleanup
Florida Department of Environmental Protection
Room 471A, Twin Towers Office Building
2600 Blair Stone Rd.
Tallahassee, FL 32399

Dear Ms. Mora-Applegate:

At your request, we have reviewed the partial draft *Risk-Based Corrective Action Report and Protocol for the Miami International Airport*, prepared by the Miami Dade Aviation Department (MDAD) and dated May 27, 1998. This document is a draft for Chapters 6 and 7. Based on our review, we have the following comments:

Chapter 6, Human Health Exposure Pathway and Receptor Analysis for Petroleum Sites

Chapter 6 describes site-specific exposure scenarios used to derive Tier 3 (site-specific) cleanup levels at Miami International Airport (MIA). Cleanup levels were developed for on-site construction workers, fire-well and landscape maintenance workers, general and indoor airport workers, and trespassers.

One aspect of the construction worker scenario presented by MDAD is that of a construction supervisor. It is unclear why a construction supervisor scenario was developed, since the supervisor is assumed to have less contact with contaminated media than the construction workers themselves.

The 4-month construction worker is assumed to ingest 195 mg soil/day, and the 2- and 6-year construction workers are assumed to ingest 240 mg soil/day. The rationale for these soil ingestion rates is not stated. USEPA guidance suggests a value of 480 mg/day for construction workers (Supplemental Guidance to RAGS, Standard Default Exposure Factors, OSWER Directive 9285.6-03, 1991).

As we have expressed to the Department previously, we are concerned that soil target concentrations for carcinogens calculated using standard procedures, but based on very short or intermittent exposures, may be invalid. The issue is relevant here for the construction worker scenarios. The 6-year construction worker scenario proposed for MIA has sufficient exposure frequency and duration that this is probably not a problem, but it is less clear that soil calculations based on carcinogenicity for the 4-month or 2-year construction worker scenarios are appropriate. One solution may be to insure that soil calculations based on non-cancer health effects are always performed along with those based on carcinogenicity, and the lower of the two soil concentrations used as the target level. Alternatively, FDEP could rely instead on alternative means (e.g., OSHA compliance) to protect workers for short duration exposures, such as construction workers with limited site contact.

Some of the exposure assumptions for other scenarios are very limited, and the rationale for these assumptions is not always clear. For example, the fire-well maintenance worker is assumed to be exposed to groundwater for 10 days per year for 25 years and that, of the 10 days exposure, he/she will be exposed to contaminated groundwater 50% of the time. In effect, exposure to contaminated well water would occur 5 days per year. This implies that half of the fire wells are located in groundwater that is not impacted by contamination. Do current and future contaminant distributions at the site support this assumption? This worker is also assumed to be exposed to contaminated soil until airport construction is completed, and that there is a 10% contribution from contaminated surface soil. It is unclear what contaminant distribution the 10% contribution is based upon. Does this mean that 10% of the fire-wells are located in areas with surface soil contamination and 90% are in non-contaminated areas? Some additional clarification or explanation of the rationale for selection of these values would be helpful. When only a fraction of the contact area is assumed to be contaminated, this has important implications in how the exposure point concentration (EPC) is derived and used. This needs to be explained.

For the landscape/maintenance worker, contribution from impacted soil is assumed to be 50%. The explanation provided for this is that the worker will spend 50% of his/her time in landscaped areas and 50% in activities with no direct contact with surface soil. The soil ingestion rate selected for this scenario, 100 mg/day, is not particularly large for someone with frequent direct contact with the soil. It could be argued that 100 mg/day is appropriate for a landscape/maintenance worker with only 50% of activities involving direct soil contact, but the further incorporation of an FC of 0.5 in effect accounts for this twice. We would recommend either using a soil ingestion rate of 100 mg/kg with an FC of 1, or an FC of 0.5 coupled with a higher soil ingestion rate (e.g., 200 mg/day) appropriate for activities with rather extensive soil contact.

A similar situation exists with the general airport worker. A soil ingestion value of 50 mg/kg is selected, which is appropriate for individuals without substantial outdoor soil exposure (rates for indoor exposure range from 56 to 100 mg/day; Exposure Factors Handbook, 1997). It is proposed to couple this soil ingestion rate with an FC of 0.1, because the workers have little outdoor exposure to soil. Again, it appears that the same

issue is accounted for in two separate terms. The limited outdoor soil exposure should be addressed through the soil ingestion rate [preferably] or adjusting the FC value, but not both.

The trespasser (i.e., a child age 6-15) is assumed to visit the site weekly, with 50% contributions from contaminated surface soil, surface water, and sediment. Although we agree that the assumption of a weekly site visit is conservative, the basis for the assumption of a 50% contribution from contaminated areas is not stated. Is this assumption based on the location of contaminants at the airport in relation to areas most likely to be visited by a trespasser? In order to show that the 50% value is reasonable and justified, some additional explanation of its rationale would be helpful.

The surface area of the trespasser available for contact is assumed to be 2,000 cm^2. This seems a bit small given the temperatures in the Miami area and the clothing likely to be worn by an older child. An approximate average surface area for children age 6-15 assuming the hands, half of the arms, and half of the legs (i.e., short-sleeve shirt and shorts) available for contact is 3,286 cm^2 (Exposure Factors Handbook, 1997).

It is stated on page 6-8 that if "construction activities are or will occur in a particular area of the Airport, the surface soil target level will apply for the total soil column. If construction is not occurring, direct exposure to soils greater than 2 feet deep will not be applicable." This statement implies that consideration of construction in the future does not extend beyond the current project. How are areas chosen for which a future construction scenario does not apply? How would construction in these areas be prevented (e.g., through institutional controls)?

Appendix I describes equations used to calculate cleanup target levels for soil and groundwater. The source from which Equations 6-2 and 6-11 (calculation of the groundwater volatilization factor and calculation of the surface water volatilization factor, respectively) were obtained or adapted should be referenced. Equations 6-4 and 6-5 describe calculation of the particulate emission factor and soil-to-air volatilization factor, respectively. The Q/C value used in both of these equations is 85.61 g/m^2-s per kg/m^3, which is presented in the USEPA SSG Technical Background Document (EPA/540/R-95/128) as representative of a 0.5 acre site in Miami. Are contaminated areas in fact limited to 0.5 acres or less? If larger areas exist, a Q/C value appropriate for that size should be selected. Equation 6-9, calculation of the volatilization factor for transport from subsurface soil to indoor air, uses defaults recommended by ASTM. A default value of 1.7 g/cm^3 is used for ρ_s (dry soil bulk density). For consistency, the same default used in the equation to calculate the soil-to-air volatilization factor (Equation 6-5) should be used, i.e., 1.5 g/cm^3.

Chapter 7, Ecological Evaluation for Petroleum Sites

In general, the guidelines for ecological assessment follow USEPA guidance with respect to selecting ecological receptor groups. There are two species of protected birds

that utilize surface water at MIA as feeding areas, the least tern and the tri-colored heron. Due to lack of specific information in the literature about these species, the belted kingfisher was chosen as a surrogate species representative of the least tern, and the great blue heron was chosen as a surrogate species representative of the tri-colored heron. Table 7-3 describes exposure factors for the surrogate ecological receptors, the belted kingfisher and the great blue heron. As a minor point, the references for the table (USEPA 1993 a,b) are not listed with the other references on page 7-12. The reference is assumed to be the USEPA Wildlife Exposure Factors Handbook. There is no reference for the equation given in Figure 7-2 to calculate the daily exposure dose of ecological receptors.

We hope these comments are helpful. Should you have any further questions, please do not hesitate to contact us.

Sincerely,

Christine Halmes

N. Christine Halmes, Ph.D.

Stephen M. Roberts, Ph.D.

Florida Department of

Memorandum **Environmental Protection**

TO: Vivek Kamath, Southeast District Office

THROUGH: Jim Crane, Technical Review Section, BWC

FROM: Ligia Mora-Applegate, Technical Review Section, BWC

DATE: August 10, 1998

SUBJECT: **RBCA Report and Protocol**
Chapters 8
Non Petroleum Sites
Miami International Airport (MIA)
Miami, Dade County, Florida

I have read the Draft White Paper for the modeling, I have no comments except to emphasize that in the Section entitled— Hydrologic Parameters— it is mentioned that certain soil parameters including porosity "....are literature-based default values that will be revised with Airport-specific data as soon as they are available" this is obviously acceptable as long as the soil moisture content (needed to derive porosity), represents an *annual* average (see discussion on this in the SCTL Manual for 62-785 FAC, pp 21-22).

cc: Tim Bahr

lm-a

Florida Department of

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July 28, 1998

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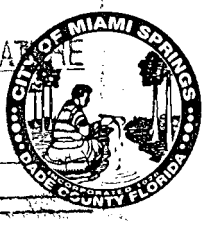
Sincerely,

Christine Halmes

N. Christine Halmes, Ph.D.

Stephen M. Roberts, Ph.D.

ACTION/ITEM
TO VK DUE 6/18
RESPOND FOR CP SIGNATURE
INVESTIGATE & REPORT
OTHER
98-0-341



City of
MIAMI SPRINGS
Florida

DEPT. OF ENV. PROTECTION

JOHN A. CAVALIER, JR., Mayor

June 8, 1998

City Hall: (305) 885-4581
Home: (305) 887-6775

Carlos Rivero-deAguilar
State of Florida
Department of Environmental Protection
P.O. Box 15425
West Palm Beach, FL 33416

Re: Consent Order and Settlement Agreement Concerning
Environmental Cleanup of the Miami International Airport

Dear Mr. Rivero-deAguilar:

The City of Miami Springs questions whether the cleanup process proposed in the Consent Order as currently written encompasses all potential sites of contamination.

There is no apparent provision in the Consent Order that requires the proposed cleanup to go beyond the boundaries of Miami International Airport (MIA). The City of Miami Springs and the Village of Virginia Gardens are located directly north of the MIA boundary and include the wellfields which provide drinking water to consumers in the northern half of the county.

The City of Miami Springs is particularly concerned about the potential for contamination spreading to the Miami Springs wellfield, which would significantly threaten human health and safety.

Likewise, as a neighboring municipality to the airport, the City is concerned that certain detriments and liabilities may accrue to the City in the future as a result of the spreading groundwater contamination at MIA which is beyond the City's control.

A comprehensive program regarding the offsite movement of airport contamination which consists of monitoring and reconnaissance wells, water quality testing, and contaminant migration modeling along with other appropriate cleanup, testing, and monitoring procedures must be included in the Consent Order.

Please acknowledge receipt of this letter and your response to these issues.

Sincerely,

John A. Cavalier, Jr.
Mayor

JAC:sh

Post-it® Fax Note 7671	Date 6-17-98	# of pages ▶ 1
To Raul Alonso	From Vic Kamath	
Co./Dept. DEP/DCAD	Co. DEP/WPB	
Phone # 305/869-	Phone # 561/681-6772	
Fax # 305/876-0376	Fax # 561/681-6770	

cc: Miami Springs Council
Mayor Paul Bithorn, Village of Virginia Gardens
Thomas M. Beason, Assistant General Counsel, FDEP

Department of
Environmental Protection

Lawton Chiles
Governor

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

MAY 27 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mercedes Sandoval Holston
Assistant County Attorney
Miami-Dade County Aviation Department
P.O.Box 592075 AMF
Miami, FL 33159-2075

RE: DEP vs. Miami-Dade County County; Settlement Agreement and Consent Order; OGC File No. 94-0984

Dear Ms. Sandoval Holston:

Enclosed for your implementation are four of the originals of the fully executed and filed Consent Order and Settlement Agreement in the above styled case. Please make sure that the compliance dates and terms agreed to Order are fully complied with.

Thank you for your cooperation in this matter. If you have any questions, please call Mr. Vivek Kamath at 561/681-6729 or Mr. Raul Alonso at 305/869-1327.

Sincerely,

Carlos Rivero-deAguilar 5/26/98
Carlos Rivero-deAguilar Date
Director of District Management
Southeast District

CRA/VK

cc: Tom Beason, OGC, DEP MS # 35
John Ruddell, DWM, DEP MS # 4500
Raul Alonso, DEP/MIA
West Palm Beach, DEP Files

Check Message

Jun 17 '98 9:27

O K		813058760376

ACTION ITEM
TO VK DUE 6/18
RESPOND FOR CLP SIGNATURE
INVESTIGATE & REPORT
OTHER 98-0-341

DEPT. OF ENV. PROTECTION

City of
MIAMI SPRINGS
Florida

JOHN A. CAVALIER, JR., Mayor

June 8, 1998

City Hall: (305) 885-4581
Home: (305) 887-6775

Carlos Rivero-deAguilar
State of Florida
Department of Environmental Protection
P.O. Box 15425
West Palm Beach, FL 33416

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Sincerely,

John A. Cavalier, Jr.

Post-it® Fax Note 7671 | Date 6-17-98 | # of pages ▶ 1
To Raul Alonso | From Vic Kamath
Co. DEP/WPB

Raul, as you know, pursuant to paragraph 8 of the Consent Order, DCAD has submitted a Proposed Schedule of Compliance for our approval. This schedule is for IPTF and Non-IPTF sites. We are supposed to review this and finalize the schedule with DERM and it will then be incorporated by reference and become a fully enforceable part of the Order.

Please make sure you work with John Wright(for IPTF sites) and others to make sure that we review their schedule and respond back to them within our guidelines for review time frames. I don't believe there are any RCRA sites in there but you might want to confirm that with John Jones. It is our responsibility to monitor compliance with the Consent Order. Thanks...Vik

METROPOLITAN **DADE** COUNTY, FLORIDA

METRO-DADE

AVIATION DEPARTMENT
P.O. BOX 592075
MIAMI, FLORIDA 33159-2075
(305) 876-7000

July 27, 1998

Carlos Rivero deAguilar, P.E.
State of Florida Department of Environmental Protection
P.O. Box 15425
West Palm Beach, Florida 33416

John W. Renfrow, P.E.
Miami-Dade County - DERM
33 SW 2nd Avenue, Penthouse 2
Miami, Florida 33130-15401

Re: FDEP/MDC Consent Order
Tenant Environmental Compliance &
Proposed MIA Schedule of Compliance

Dear Messrs Rivero deAguilar & Renfrow:

Pursuant to the requirements of the Tenant Environmental Compliance Section (paragraphs 11 & 13) of the above referenced Consent Order; we are enclosing for your information and files a copy of the letter sent by our attorneys on July 24, 1998 to the appropriate MIA tenants (mailing list also enclosed).

We are also enclosing the Proposed Schedule of Compliance pursuant to paragraph 8 of the Consent Order consisting of:

1) MIA Schedule of Compliance Rationale with a Prioritization Matrix

2) Preliminary MIA Schedule including location, activity descriptions, proposed timeframes and comments (Table 2)

3) Environmental Consent Order - 1998 Bar Chart (Primavera) Schedule

If you have any questions, please contact me at 876-7928.

Sincerely,

Pedro Hernandez by ASOA
Pedro F. Hernandez, P.E., Manager
Environmental Engineering

PFH/ggm-v

Enclosures

cc: Mercedes Sandoval, DCAD
Thomas Robertson,M-DC
Curt Williams, DERM
Thomas Beason, FDEP
Raul Alonso, FDEP

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FACSIMILE COVER SHEET

Please deliver the following page(s) to:

NAME: PEDRO F. HERNANDEZ

ADDRESS: DCAD

FACSIMILE NUMBER: 876-0239

CONFIRMATION NUMBER:

FROM: DOUGLAS M. HALSEY

COMMENTS:

Total number of pages including cover page: 9

DATE: July 24, 1998

REFERENCE: 1350

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