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# Memorandum

To: Honorable Chair Jack Donovan and Members of the CRA  
From: Matt Dubé  
CC: Russ Blackburn  
Gene Francis  
Anthony Lyons  
Tom Saunders  
Date: 12/14/2006  
Re: Gainesville Greens Environmental Issues

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Soil and groundwater assessments conducted on City of Gainesville Parking Lot 10, the proposed Gainesville Greens site, indicate the presence of dry cleaning solvent residuals at levels above the State of Florida soil and groundwater cleanup target levels. The contamination is believed to be derived from a former dry cleaning operation once located on the northeast corner of the property.

The site is in the State Dry Cleaning Solvent Cleanup Program. The site is currently scored 25 and is ranked 955 on the priority list. Because of the low priority score, it has been estimated that it may be years before the state is able to address this site.

During the site plan approval process, the Development Review Board (DRB) expressed concern that 1) if deep pilings were installed, this could cause contamination to move deeper into soils and 2) if a building were placed over the contaminated area, access to the contaminated area for the purposes of remediation would not be possible.

The CRA discussed the contamination issue on June 19, 2006 and directed staff to look thoroughly into these concerns and provide the best possible recommendations for resolution.

A meeting was held on July 13, 2006, with CRA staff, Equity Ventures Inc.'s consultant Water & Air Research, Inc. (Water and Air), Alachua County Environmental Protection Department (ACEPD), DRB member Steven Boyes, and City Planning staff to outline an action plan to address the contamination concerns. The consensus of the group was that the construction should not contribute to the spread of contamination nor should construction preclude future clean up. It was agreed that Water and Air and ACEPD should develop a plan for additional soil and groundwater sampling to address concerns that a source of chlorinated solvents possibly exists on the site. In response to the first concern regarding the construction of deep pilings, Equity Ventures decided to change its construction method to a foundation system without deep pilings that would eliminate the possibility of spreading contamination to deeper soils.

In August 2006, Equity Ventures directed Water and Air to conduct additional soil borings and groundwater sampling to determine if construction on the site would preclude or hinder future clean up. The sampling plan, which ACEPD approved, focused on determining whether or not a source of concentrated solvents was present on the site.

Water and Air completed the sampling work and submitted a report titled "Environmental Testing, City of Gainesville Parking Lot #10" dated September 2006. One of the conclusions of the report was that test results do not indicate the occurrence of a source of concentrated solvents on Lot #10 in the vicinity of the former-dry cleaner. This result is consistent with previous testing results obtained for the site. Water and Air wrote in a technical memorandum titled "Contamination Cleanup Options, City Parking Lot #10" dated September 12, 2006 that the presence of a source of contamination is often the basis for excavation, but since the September 2006 data suggest the absence of a source, there is "no compelling reason to select excavation as a cleanup strategy". The absence of a contamination source on the site is significant in that it suggests construction on Lot #10 is not expected to be hindered by remedial actions to remove a contaminant source. Further, according to Water and Air, if groundwater remediation should be required at some point, the state cleanup program can address it using means such as wells combined with appropriate cleanup technologies installed in the areas of open ground that will remain after construction. This statement is supported by the assessment results as well as the current site plan that shows portions of Lot #10 on the east side remaining accessible for installing wells. Based on the evidence presented, CRA staff concurs with the findings of Water and Air and believes construction is not expected to preclude or hinder groundwater remediation if required in the future.

ACEPD reviewed the two Water and Air documents summarized above and wrote on September 25, 2006 that it agreed with the general conclusions presented by Water and Air and had several recommendations for the developer. The recommendations require Equity Ventures to 1) develop a Health and Safety Plan to protect construction workers if they encounter contamination 2) develop a Waste Management Plan for potentially contaminated soil and groundwater encountered 3) restrict construction below land surface to no deeper than 27 feet and 4) properly abandon an existing monitoring well prior to construction. Equity Ventures has verbally indicated to CRA staff that it is in agreement with these recommendations in their entirety. Both the Water and Air documents and the letter issued by ACEPD are attached to this memorandum.

It is the opinion of CRA staff that the two main concerns regarding the contamination are being adequately addressed in light of the recent findings. Equity Ventures has proposed constructing a foundation without deep pilings to prevent the possible vertical migration of contaminants. The absence of data indicating a source of dry cleaning solvent contamination existing on site is consistent with previous testing and therefore supports the prospect that excavation of contaminated soils will not be required, avoiding remediation-related impediments to constructing the project. The absence of this data also suggests that it is not likely that construction will preclude future cleanup of groundwater contamination if required by the state cleanup program. CRA staff believes that Equity Ventures' agreement with the recommendations of ACEPD is a prudent step to resolve the contaminant issue on the site.