



February 15, 2024

Lee County Board of County Commissioners  
2120 Main Street  
Fort Myers, FL 33901

**Re: Memorandum  
SR-82 MRF Phase II ESA  
11900 SR-82  
Fort Myers, FL 33193**

This memorandum addresses the Phase II Environmental Site Assessment (ESA) results and methodology and also provides brief conservative guidance relating to the Site's planned redevelopment as a material recycling facility.

Impacted groundwater was encountered during the Phase II ESA. However, many of the exceeding parameters can be naturally occurring and have regulatory standards set based on organoleptic rather than health-based considerations. These groundwater impacts should not preclude site redevelopment for industrial purposes.

Soil samples were not collected during the Phase II ESA because the water table at this site is at or near the surface. Soil below the groundwater table does not need to be sampled for comparison to the Soil Cleanup Target Levels (SCTLs) because SCTLs do not apply to soil below the groundwater table (per Chapter 62-780, F.A.C. and FDEP's Guidance Document [Chapter 62-780, F.A.C., Supplemental Guidance for Application of Direct Exposure Soil Cleanup Target Levels for Subsurface Soils](#)).

While soil samples were not collected based on the discussion above, Lee County may consider additional precautions to limit any direct exposure and groundwater mobility. Common engineering controls such as capping in place with two feet of clean fill, or asphalt/concrete surfaces are very effective. Additionally, it is recommended to limit development in the area of MW-3 to the extent possible. The stormwater pond should be constructed on the north portion of the property.

Water from the Water-Table Aquifer should not be used for any purposes. Any irrigation wells should be installed in a deeper confined aquifer such as the Sandstone Aquifer.

The concentration of isopropylbenzene in MW-3 only slightly exceeded the Groundwater Cleanup Target Level (GCTL) and was detected between the Laboratory's method detection limit and the practical quantitation limit. Additionally, arsenic only slightly exceeded its respective GCTL in MW-6. Resampling MW-3 for isopropylbenzene and MW-6 for arsenic may resolve the exceedances. However, additional assessment may be warranted if the exceedances are confirmed.

Please see the complete Phase II ESA for additional information on this project and feel free to contact us if you have any further questions.

Respectfully submitted,  
**AMERICAN MANAGEMENT RESOURCES CORPORATION**

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Senior Engineer