

**FIFTH FIVE-YEAR REVIEW REPORT FOR
FLORIDA STEEL CORP. SUPERFUND SITE
MARTIN COUNTY, FLORIDA**



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Prepared by

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LIST OF ABBREVIATIONS AND ACRONYMS

ARAR	Applicable or Relevant and Appropriate Requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
COC	Contaminant of Concern
CSM	Conceptual Site Model
EC	Emission Control
EPA	United States Environmental Protection Agency
ESD	Explanation of Significant Differences
FDEP	Florida Department of Environmental Protection
FDER	Florida Department of Environmental Regulation
FDOH	Florida Department of Health
FS	Feasibility Study
FSC	Florida Steel Corporation
FYR	Five-Year Review
IC	Institutional Control
MCL	Maximum Contaminant Level
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
NCP	National Contingency Plan
NPL	National Priorities List
O&M	Operation and Maintenance
OU	Operable Unit
PCB	Polychlorinated Biphenyl
pCi/L	picocuries per liter
PRP	Potentially Responsible Party
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
ROD	Record of Decision
RPM	Remedial Project Manager
RSL	Regional Screening Level
SCTL	Soil Cleanup Target Levels
TSCA	Toxic Substances Control Act
UU/UE	Unlimited Use and Unrestricted Exposure

I. INTRODUCTION

The purpose of a five-year review (FYR) is to evaluate the implementation and performance of a remedy to determine if the remedy is and will continue to be protective of human health and the environment. The methods, findings and conclusions of reviews are documented in FYR reports such as this one. In addition, FYR reports identify issues found during the review, if any, and document recommendations to address them.

The U.S. Environmental Protection Agency is preparing this FYR pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121, consistent with the National Contingency Plan (NCP) (40 Code of Federal Regulations (CFR) Section 300.430(f)(4)(ii)), and considering EPA policy.

This is the fifth FYR for the Florida Steel Corp. Superfund Site. The triggering action for this statutory FYR was the signing of the previous FYR. The FYR has been prepared because hazardous substances, pollutants or contaminants remain at the Site above levels that allow for unlimited use and unrestricted exposure (UU/UE).

The site consists of two operable units (OUs). This FYR addresses both site OUs. OU-1 addresses remaining sources, incinerator ash, soil and sediment contamination at the site, and implementation of surface water runoff and groundwater monitoring. OU-2 addresses contaminated groundwater and metal-contaminated sediment in the Southwest Wetland.

EPA remedial project manager (RPM) Joydeb Majumder led the FYR. Participants included EPA hydrogeologist Katherine Schroer, EPA community involvement coordinator L'Tonya Spencer-Harvey, Florida Department of Environmental Protection (FDEP) project manager Killian Talley and Amanda Goyne from EPA support contractor Skeo. The potentially responsible party (PRP), Gerdau Ameristeel, was notified of the initiation of the FYR. The review began on 9/21/2020.

Site Background

The 151.6-acre site is located at 18300 Warfield Boulevard (State Road 710), about two miles northwest of the rural community of Indiantown in Martin County, Florida (Figure D-1). Before Florida Steel Corporation (FSC), now known as Gerdau Ameristeel, acquired the site property in 1969, it consisted mostly of brushland and swampy areas. FSC operated a steel mill from November 1970 until February 1982. Mill operations contaminated site soil, groundwater and sediment with metals, polychlorinated biphenyls (PCBs) and radionuclides. On-site water bodies include the Southwest Wetland, stormwater retention ponds and drainage ditches. The site contains a fenced landfill; water storage tank; inactive water treatment facility; recovery, injection, production and monitoring wells; and inactive spray fields.

The site property and areas to the southeast, southwest, and northwest are zoned for industrial uses. There are several wetlands south and east of the site. There is a Florida Power & Light electrical substation on the site. Transmission lines, about 200 feet from the site boundary, parallel the site's southwestern and southeastern boundaries; one crosses the western part of the site. The area northeast of Warfield Boulevard (State Road 710) and the railroad is zoned for agricultural land uses and includes several wetland areas.

There are two major aquifers in Martin County. A surficial aquifer with shallow and deep zones is about five to 130 feet below the land surface. The Floridan aquifer is 600 to 1,500 feet below the land surface

and is separated from the surficial aquifer by a thick, low-permeability layer of sand and clay (known as the confining layer). Groundwater flows to the south at the site. The Indiantown Company provides potable water supplies to nearby areas from eight surficial aquifer wells two miles southeast of the site. According to a current well survey presented in the 2019 Institutional Control Status Update memorandum for the site, there are no potable water supply wells within one mile downgradient of the site. The survey identified two permitted irrigation wells in the general downgradient direction, but not within the area of site groundwater contamination.

The EPA determined that the site met the Sitewide Ready for Anticipated Use performance measure in April 2015. Most of the site is currently for sale; Gerdau Ameristeel will own the landfill (known as the vault parcel) in perpetuity, so the landfill is excluded from the area for sale. Refer to Appendix A for additional resources, Appendix B for site status information and Appendix C for the site’s chronology of events.

FIVE-YEAR REVIEW SUMMARY FORM

SITE IDENTIFICATION		
Site Name: Florida Steel Corp.		
EPA ID: FLD050432251		
Region: 4	State: Florida	City/County: Indiantown/ Martin
SITE STATUS		
NPL Status: Final		
Multiple OUs? Yes	Has the Site achieved construction completion? Yes	
REVIEW STATUS		
Lead agency: EPA		
Author name: Joydeb Majumder		
Author affiliation: EPA with support provided by Skeo		
Review period: 9/21/2020 - 7/13/2021		
Date of site inspection: 3/3/2021		
Type of review: Statutory		
Review number: 5		
Triggering action date: 8/16/2016		
Due date (five years after triggering action date): 8/16/2021		

II. RESPONSE ACTION SUMMARY

Basis for Taking Action

Under the oversight of FDEP, FSC conducted Phase I and II remedial investigations (RIs) at the Site in 1988 and 1989. FSC defined cleanup levels for exposure scenarios that could adversely affect human health based on a 1990 quantitative risk assessment. FSC determined that the exposure pathways that posed potential carcinogenic or non-carcinogenic risks were:

- Dermal contact with and ingestion of contaminated soil by industrial workers under current and future use conditions at the Site.
- Ingestion of contaminated water at nearby off-site locations in the future if contaminated groundwater was not treated.

The quantitative risk assessment found that the highest potential risk was associated with ingestion of contaminated groundwater, although no entities are known to use it. The quantitative risk assessment did not evaluate exposure to contaminated sediment and surface water because the chance of exposure was determined to be very low at the Site. In May 1991, the Wetland Impact Study indicated that concentrations of metals such as lead and zinc were above screening levels in sediments in the northern part of the Southwest Wetland.

The quantitative risk assessment found that the relative concentrations of lead, cadmium and chromium in soils were consistent throughout the Site. The quantitative risk assessment concluded that removal of lead to the remediation goal would result in the simultaneous removal of cadmium, chromium, and zinc. Table 1 lists Site contaminants of concern (COCs).

Table 1: COCs, by Media

COC	Media ^b
Cadmium	Soil
Chromium	Soil
Lead	Soil
Zinc	Soil
PCBs	Soil
Sodium ^a	Groundwater
Radium-226 and radium-228 ^a	Groundwater
Gross alpha ^a	Groundwater
<p><i>Sources:</i> 1992 OU-1 Record of Decision (ROD) and 1994 OU-2 ROD.</p> <p><i>Notes:</i> ^a The OU-2 ROD identified three “Tier 1” COCs for groundwater that represent most groundwater contamination: sodium, radium 226 + radium 228, and gross alpha. The OU-2 ROD also identified five “Tier 2” contaminants that were detected sporadically in a limited number of wells (cadmium, lead, benzene, tetrachloroethene and vinyl chloride). The 1994 ROD states that “the Tier 2 contaminants can be monitored less frequently than Tier 1 contaminants.” See the Data Review section of this FYR Report for the most recent Tier 2 results. ^b The EPA did not identify COCs for sediment.</p>	

Response Actions

In August 1980, the EPA found elevated levels of contaminants in emission control (EC) dust, the shallow surficial aquifer, and the soil. The Resource Conservation and Recovery Act (RCRA) listed EC dust as a hazardous waste that same year. In 1981, the Florida Department of Environmental Regulation (FDER, now FDEP) conducted a RCRA compliance investigation of the facility and obtained EC dust samples from uncontained waste piles at the Site. The EPA placed the Site on the Superfund program's National Priorities List (NPL) in September 1983 based on the potential threat to the environment from heavy metals in EC dust and the shallow surficial aquifer.

In March 1983, FDER discovered some of the EC dust was contaminated with PCBs. FSC and FDEP also discovered Site soils contaminated with PCBs in limited areas and in a small area west of a slag disposal area.

FSC removed about 8,000 tons of EC dust from disposal areas during 1985 and shipped it to a metal recycling facility for zinc recovery. From February to May 1986, FSC excavated about 11,200 tons of soil, sediment and EC dust containing PCBs at concentrations at or above 50 milligrams per kilogram (mg/kg) from the Site. FSC temporarily placed the excavated material in a specially constructed on-site storage vault and backfilled the area with clean fill material. FSC began periodically monitoring groundwater at the Site in 1986. Based on a 1986 feasibility study (FS) developed by FSC, the EPA directed FSC to incinerate the PCB-contaminated soil. FSC began incineration of the material in the storage vault in October 1987 and completed it in May 1988. Due to the presence of heavy metals in the ash, FSC consolidated the material in a specially designed ash retention building pending remedial design.

OU-1

The EPA issued a Record of Decision (ROD) for OU-1 in June 1992. Although the selected remedy for OU-1 did not specify remedial action objectives (RAOs), the remedy was designed to address remaining sources, incinerator ash, soil and sediment contamination at the Site and implement groundwater and surface water runoff monitoring. The selected OU-1 remedy included:

- Excavation and off-site disposal of about 600 cubic yards of soil contaminated with PCBs at concentrations equal to or greater than 50 mg/kg in areas that had previously been remediated.
- Excavation and on-site solidification of about 37,000 cubic yards of the following:
 - EC dust and metals-contaminated soil and ash. All EC dust and ash would be excavated and treated; soil containing lead above 600 mg/kg would be excavated and treated.
 - Soil containing PCB levels between 25 mg/kg and 50 mg/kg.
- Restrictions on any excavation below the water table unless the water treatment system anticipated for the OU-2 is operational. However, at the time of the ROD, it was not anticipated that excavation below the water table would be needed.
- Control of surface water runoff from the Site during remediation of on-site soils; analysis of surface water samples for lead and zinc may continue for at least two years after all on-site construction is completed.
- Compliance with RCRA Land Disposal Restriction Treatment Standards for EC dust, which is a listed RCRA waste, by meeting levels specified in the treatability variance for contaminated soil and debris.
- Disposal of all solidified material in an on-site, double-lined RCRA landfill with a RCRA cap.
- The landfill would meet the provisions of 40 CFR Subpart N landfill requirements and would be built above the water table.

- Periodic monitoring of surface water runoff and groundwater quality. The quality of surface water runoff should be consistent with possible future criteria developed for the Site’s wetlands (OU-2). Groundwater quality would be monitored for up to 30 years.

OU-2

The EPA issued the ROD for OU-2 in March 1994. Although the selected remedy for OU-2 did not specify RAOs, the remedy was designed to address groundwater and the Southwest Wetland. The 1994 ROD notes that the EPA may re-evaluate the system’s performance if groundwater contaminant levels remain higher than extraction standards and stop declining. Groundwater extraction and discharge standards for remediation of the plume are referenced in Table 2. The selected OU-2 groundwater remedy included:

- Extraction of contaminated groundwater through a system of shallow and deep recovery wells.
- Blending contaminated groundwater from the plumes with clean water from deep production wells located on upgradient parts of the Site to achieve compliance with state and federal maximum contaminant levels (MCLs).
- Spray field discharge of the blended groundwater. The blended water must meet drinking water standards (MCLs) before being discharged to the on-site spray fields.

Table 2: Groundwater COC Cleanup Goals

Groundwater COC	OU-2 ROD Cleanup Goal
Sodium	160 mg/L ^a
Radium-226 + radium-228	5 pCi/L ^b
Gross alpha	15 pCi/L ^b
<i>Notes:</i> mg/L – milligrams per liter pCi/L – picocuries per liter ^a State standard only; there is no federal MCL for sodium. ^b Federal and state standards are the same.	

Remediation in the Southwest Wetland addressed metal-contaminated sediment within the northern portion of the Southwest Wetland. The selected wetland remedy in the 1994 OU-2 ROD included:

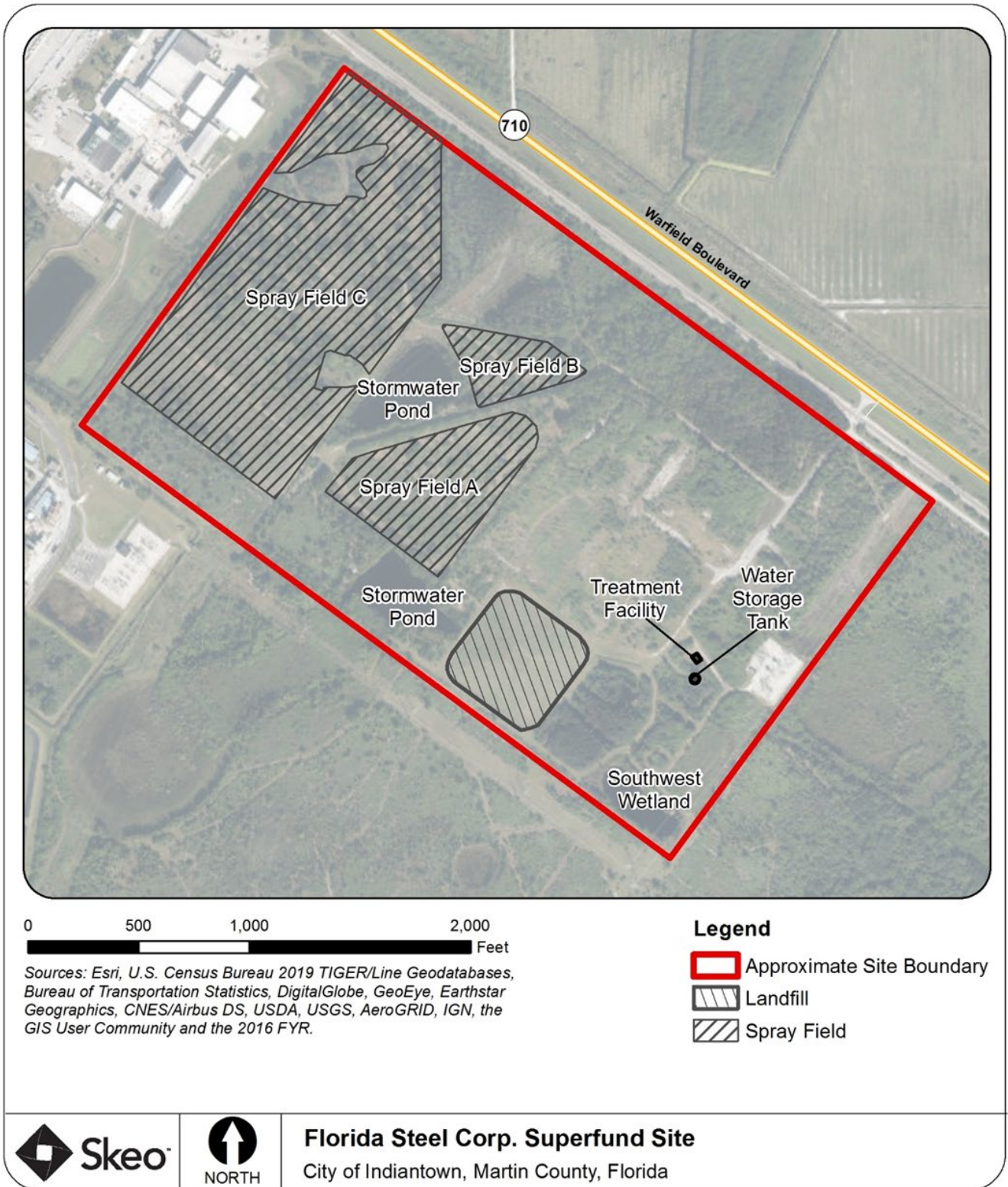
- Clearing vegetation from the northern 3.8-acre portion of the Southwest Wetland. Excavating the upper six inches of metals-contaminated sediment within the cleanup area. The EPA selected a cleanup area, rather than a cleanup level, for sediment in the Southwest Wetland. The EPA selected the cleanup area after evaluation of a literature review of biological effects levels, site-specific ecological data, the decreasing concentration gradient for metals in the wetland sediment, and preservation (where possible) of the functional wetland.
- Excavating and stockpiling the remaining sediment. Excavated wetland sediment with lead concentrations above 600 mg/kg to be solidified and disposed of in the on-site landfill constructed as part of OU-1. Solidification standards are the same as specified in the ROD for OU-1.
- Backfilling the excavated area with clean sand and previously excavated sediment that contains lead and zinc below their respective screening values. The upper portion of the backfill layer should consist of at least six inches of clean sediment. The area should be backfilled so that the resulting ground elevation is about 12 inches lower than the original ground elevations.

- Revegetating the disturbed areas with native wetland vegetation in accordance with plans approved by the EPA, FDEP and Martin County.
- Monitoring and maintaining the revegetated areas to promote regrowth and to remove exotic or nuisance species. This maintenance period was to last at least five years.

The 2013 Explanation of Significant Differences (ESD) modified the OU-1 and OU-2 RODs to document institutional controls as part of the remedy for the Site. Institutional controls cited in the ESD include:

- Limiting future uses of the property to industrial or commercial purposes.
- Restricting any future use of the landfill area to preserve the integrity of the landfill.
- Restricting the use of contaminated groundwater until cleanup levels and RAOs have been achieved.

Figure 1: Detailed Site Map



Disclaimer: This map and any boundary lines within the map are approximate and subject to change. The map is not a survey. The map is for informational purposes only regarding the EPA's response actions at the Site.

Status of Implementation

OU-1

In February 1993, the EPA and FSC signed a Consent Decree for the OU-1 remedy. FSC initiated the remedial design for OU-1 in February 1993 and completed the remedial design in September 1994. Excavation activities associated with the OU-1 remediation began in January 1995 and continued through November 1995. The PRP's contractor removed about 43,500 cubic yards of EC dust, soil, sediment and debris. FSC performed verification sampling to confirm that all soil, slag and sediment exceeding cleanup criteria were removed.

The on-site landfill covers about six acres of the Site (Figure 1). A PRP contractor, OHM Corporation, constructed the bottom liner and leachate control systems between June 1995 and October 1995. FSC began full-scale treatment of contaminated soil, sediment, and slag in October 1995, and completed it in December 1995. The combined wet weight of lead- and PCB-contaminated material treated was about 81,200 tons.

FSC placed all treated materials in specific areas within the above-grade on-site landfill. After all materials were disposed of in the containment, FSC constructed the RCRA cap top liner system between February 1996 and April 1996. FSC installed a security fence around the base of the on-site landfill.

As part of the remedial action, FSC routed all surface water runoff to the on-site stormwater retention ponds. FSC collected and analyzed surface water samples for lead and zinc. The OU-1 ROD states that surface water runoff and analysis of surface water samples may continue for at least two years after all on-site construction was completed. Surface water sampling for lead and zinc was discontinued after 2006 as the results for these two metals were below the state of Florida Class III water quality criteria. Surface water sampling for sodium, radium and gross alpha was discontinued after October 2011 as sample results were below the groundwater cleanup goals as specified in the OU-1 ROD.

The PRP also discontinued groundwater sampling for PCBs, lead, cadmium, chromium and nickel in three OU-1 wells (M-71, RW-4 and RW-5) because these analytes were consistently below detection or criteria.

OU-2 Groundwater

The EPA and FSC signed a Consent Decree for the OU-2 remedy in January 1995. FSC began remedial design for OU-2 in October 1994 and completed the remedial design in June 1995. FSC installed the groundwater remediation system between April 1996 and January 1997. The remediation phase, which began in April 1997, involved extraction, treatment and disposal of groundwater from the plume.

The groundwater remediation system consists of recovery and injection wells in the shallow and deep surficial aquifer, upgradient production wells, a treatment facility; an aboveground 300,000-gallon water storage tank; a 40-acre spray field separated into three areas (A, B and C), and monitoring wells within the spray field areas and downgradient of the property boundary (Figure 1).

In April 2009, a wildfire in the project area destroyed most of the spray irrigation system spray heads and some of its electrical services; the groundwater remediation system has not functioned since that time. Groundwater monitoring is ongoing. The PRP prepared a January 2019 Operable Unit 2

Supplemental Remedy Investigation report (OU-2 Supplemental RI), which presents the results from the PRP's 2018 supplemental investigation to support refinement of the conceptual site model (CSM) and OU-2 remedy optimization activities. The OU-2 Supplemental RI report found no evidence of an ongoing source to groundwater. See the Data Review section of this FYR for additional information.

The PRP completed a radionuclides supplemental investigation, with results presented to the EPA in subsequent technical meetings and summarized in a February 2021 Summary of OU-2 Radionuclide Investigations memorandum. The report concluded that radionuclides in groundwater appear to be a naturally occurring condition at the Site. EPA agreed with the conclusion of the assessment.

OU-2 Wetland

FSC began restoring the Southwest Wetland in July 1995 and completed it in December 1995. The wetlands cleanup for the northern portion of the Southwest Wetland included clearing existing vegetation, removal of contaminated sediment and revegetation. FSC solidified and disposed of sediments with lead concentrations above 600 mg/kg in the on-site landfill. For excavated upland areas on the Site, as a soil additive, FSC used excavated sediment containing lead at concentrations ranging between 160 mg/kg to 600 mg/kg. The EPA and FDEP performed formal inspections of the Southwest Wetland in May 1996, December 1996, March 1997, and October 1997.

Ardaman & Associates, Inc. and OHM Corporation, as the PRP's contractors, conducted the principal remedial activities. EPA Region 4 provided oversight of the Site's cleanup. FDEP provided technical review and approval of wetlands restoration.

Institutional Control (IC) Review

Institutional controls in the form of restrictive covenants (1990 and 2015) are in place to limit Site groundwater use and land uses, including swimming, hunting, fishing, camping, recreational activities, growing crops for humans or animals, residential land uses, day care facilities, playgrounds and schools (Appendix K). The 2015 restrictive covenant prohibits any use of the landfill vault without prior written consent of FDEP and EPA. The 2015 restrictive covenant also prohibits any activity or construction on, or any improvement or alteration of, the landfill vault that could damage or impair its structural integrity without prior written consent of FDEP and EPA. In December 2016, Gerdau Ameristeel sold parcel 35-39-38-000-00011-1 to the Floridian Natural Gas Storage Company LLC. Gerdau Ameristeel will retain ownership of parcel 35-39-38-000-00013-0 (the vault parcel) in perpetuity (see Figure 2).

The Site is also located in a Florida Groundwater Delineated Area, which restricts well construction and groundwater use within the delineated area. Figures I-1, I-2 and I-5 in Appendix I show the locations of wells that exceeded the sodium and radionuclide extraction standards during the most recent June 2019 sampling. All exceedances are within the Site boundary or just outside the southwestern Site boundary, but within the Florida Groundwater Delineated Area.

Some Site wells are located on the 291-acre property located downgradient of the Site (parcel 35-39-38-000-000-00010-2). Per the 2019 Institutional Control Update memorandum for the Site, this downgradient parcel (see Figure D-2 for the parcel's full extent) is undeveloped and is used for cattle farming. The downgradient parcel is zoned "M-1" (Manufacturing), with a Future Land Use

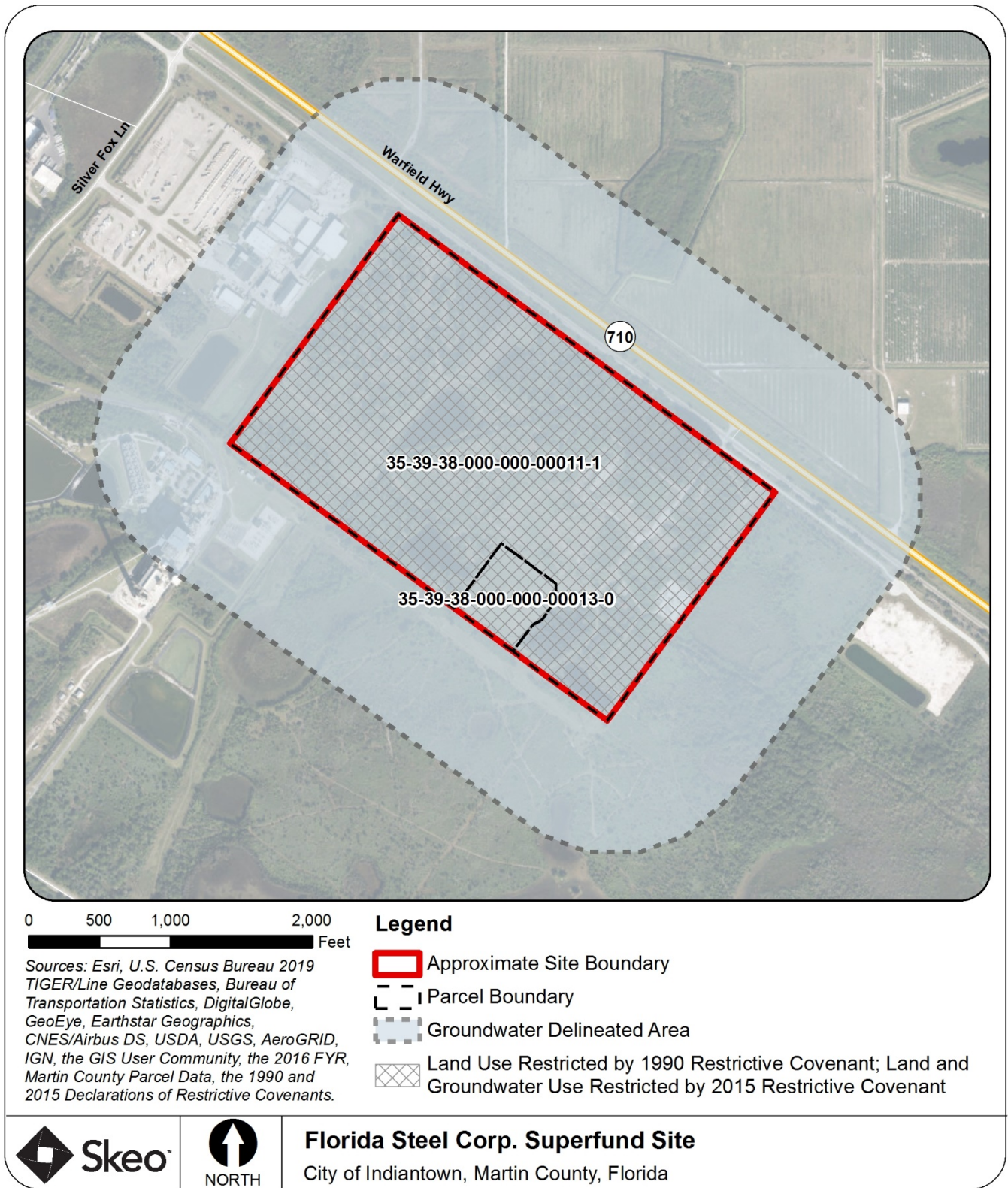
classification of “Industrial.” It is in the Martin County Primary Urban Service District, where connection to regional potable water systems is required if available. An appropriate potable water line, reuse water line, and sanitary sewer force main are available to serve the downgradient property. In addition, a July 2010 Grant of Easement encumbers the downgradient property for the purpose of constructing and providing water and sewer service to the property (Appendix K).

Tables 3 lists the institutional controls associated with areas of interest at the Site. Figure 2 shows the areas included in the institutional controls.

Table 3: Summary of Planned and/or Implemented Institutional Controls (ICs)

Media, Engineered Controls, and Areas That Do Not Support UU/UE Based on Current Conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Groundwater	Yes	Yes	35-39-38-000-000-00013-0 35-39-38-000-000-00011-1	Restrict the use of groundwater until cleanup levels and RAOs have been achieved.	Florida Delineated Groundwater Area and 2015 Restrictive Covenant
Soil	Yes	Yes	35-39-38-000-000-00013-0 35-39-38-000-000-00011-1	Limit future uses of the property and future use or disturbance of the landfill area (i.e., the vault parcel).	1990 Restrictive Covenant and the 2015 Restrictive Covenant

Figure 2: Institutional Control Map



Disclaimer: This map and any boundary lines within the map are approximate and subject to change. The map is not a survey. The map is for informational purposes only regarding the EPA's response actions at the Site.

Systems Operations/Operation and Maintenance (O&M)

OU-1

O&M activities in the 1996 OU-1 O&M plan include:

- Routine quarterly inspections and routine maintenance (e.g., mowing, weeding).
- Checking and removing leachate as necessary in the leachate collection and leak detection sumps.
- Routine sampling of surface water for lead, zinc, pH, conductivity, and hardness whenever significant discharge occurs from the Site to the Southwest Wetland.
- Annual sampling and analyses of three wells (M-71, RW-4 and RW-5) for PCBs, lead, cadmium, chromium and nickel.

The PRP performs inspections and routine maintenance as specified in the O&M plan. The PRP also checks and removes leachate as necessary. The PRP most recently measured the leachate level in 2018, at which point the liquid level was about six inches above the lowest bottom liner elevation. Leachate removal is scheduled to occur when the leachate level is equal to or greater than 12 inches above the liner elevation. Because actionable leachate levels have not been reached, no leachate removal events have been performed since this measurement. The PRP sampled the leachate observed in 2018 and analyzed for Site COCs. All concentrations were reported below the laboratory method detection limits, MCLs, or surface water cleanup target levels according to Chapters 62-302 and/or 62-777, Florida Administrative Code. The future revised OU-1 O&M plan will specify monitoring and inspection criteria, as well as analytical criteria, as the leachate disposal method will be dictated by analytical results. The PRP is evaluating leachate disposal alternatives and these will be included in the forthcoming O&M plan anticipated in 2021.

The PRP discontinued sampling of surface water because results were consistently below state of Florida Class III surface water criteria. Analyses of PCBs, lead, cadmium, chromium and nickel in three OU-1 wells (M-71, RW-4 and RW-5) was also discontinued because these analytes were consistently below detection or criteria. The EPA approved these sampling changes. The PRP is updating the OU-1 O&M plan to reflect these changes.

OU-2

O&M activities in the 1997 OU-2 O&M plan include:

- Install and operate a groundwater remediation and spray irrigation system.
- Implement a sampling and testing program for the groundwater remediation system, as well as a maintenance program.

The groundwater remediation system has not operated since April 2009. Since then, Gerdau Ameristeel's contractor, with the EPA's approval, has monitored the groundwater quality in the shallow and deep zones of the shallow aquifer semi-annually to determine whether the system needs to be restarted or whether additional remedial action should be taken. Contractors have been sampling selected wells since April 2009.

In September 1998, FSC submitted a request to the EPA for termination of the monitoring program for the Southwest Wetland. The revegetation contractor performed site inspections for a period of five years after revegetation of the Southwest Wetland. During the first year, the contractor performed inspections monthly for the first three months following planting, and quarterly inspections thereafter.

O&M Costs

Projected O&M costs per year from the RODs were:

- \$18,200 for up to 30 years for the OU-1 inspection, maintenance and sampling.
- \$83,000 for 10 years for the OU-2 groundwater remediation system O&M.
- \$7,500 for five years for the OU-2 Southwest Wetland restoration.

The five-year O&M period for the Southwest Wetland has been completed. Table 4 presents annual O&M costs over the FYR period.

Table 4: O&M Costs Over the FYR Period

Date Range	Total Cost (rounded to the nearest \$1,000)
2016	\$120,000
2017	\$105,000
2018	\$250,000
2019	\$225,000
2020	\$100,000

III. PROGRESS SINCE THE PREVIOUS REVIEW

This section includes the protectiveness determinations and statements from the 2016 FYR as well as the recommendations from the 2016 FYR and the status of those recommendations.

Table 5: Protectiveness Determinations/Statements from the 2016 FYR

OU #	Protectiveness Determination	Protectiveness Statement
1	Short-term Protective	The remedy for OU1 currently protects human health and the environment because groundwater monitoring continues, contaminated source material and soil contamination have been excavated, stabilized, and contained in the on-site landfill and there are no current exposures to contamination. In order for the OU1 remedy to be protective in the long term, animal burrows in the landfill cap must be repaired, relocating any sensitive species per state or local law.
2	Short-term Protective	The remedy for OU2 currently protects human health and the environment because, although the groundwater remediation system is not operating as designed, there are no current exposures to contamination. In order to be protective in long term, the appropriate course of action for addressing lingering contamination must be determined.
Sitewide	Short-term Protective	Because the remedial actions at all OUs are protective in the short term, the Site’s remedy is protective of human health and the environment in the short term. In order for the remedy to be protective in the long term, issues identified in the OU1 and OU2 protectiveness statements should be addressed.

Table 6: Status of Recommendations from the 2016 FYR

OU #	Issue	Recommendations	Current Status	Current Implementation Status Description	Completion Date (if applicable)
1	There are animal burrows in the capped area.	Address animal burrows in cap and relocate sensitive species per state or local law.	Completed	In October and November 2016, PRP contractors and a licensed Authorized Gopher Tortoise Agent surveyed and relocated gopher tortoises found occupying burrows on the containment vault area and within the security fence around the vault, per notification and permitting procedures required by the Florida Fish and Wildlife Conservation Commission. PRP contractors then backfilled and seeded or sodded all burrow locations. PRP contractors regularly inspect the vault area for new burrows; if identified, gopher tortoises are relocated, and burrows are repaired.	11/30/2016
2	The OU2 remedy has been offline since 2009 and it may not be practical to restart it, although several shallow and deep wells continue to exceed cleanup standards and there is some evidence of deep aquifer migration.	Consider targeted remedial actions to address lingering exceedances and migration. Update site decision and operation and maintenance (O&M) documents as needed.	Ongoing	<p>The January 2019 Operable Unit 2 Supplemental Remedy Investigation (OU-2 Supplemental RI) report presents the results from the PRP’s 2018 supplemental investigation to support refinement of the CSM and OU-2 remedy optimization activities. The OU-2 Supplemental RI report concluded that Site conditions appear to be favorable for continuing monitored natural attenuation. See the Data Review section of this FYR for additional information.</p> <p>The PRP also completed a radionuclides supplemental investigation, with results presented in a February 2021 Summary of OU-2 Radionuclide Investigations memorandum. The report concluded that radionuclides in groundwater appear to be a naturally occurring condition at the Site.</p>	

IV. FIVE-YEAR REVIEW PROCESS

Community Notification, Community Involvement and Site Interviews

A public notice was made available by a newspaper posting in the Hometown News on 12/18/2020 (Appendix E). It stated that the FYR was underway and invited the public to submit any comments to the EPA. The results of the review and the report will be made available at the Site’s information repository, Martin County Library System, located at 15200 SW Adams Avenue, Indiantown, Florida 34956.

During the FYR process, interviews were conducted to document any perceived problems or successes with the remedy that has been implemented to date. The interviews are summarized below. Completed interview forms are in Appendix F.

Steven Folsom, HSW Consulting (PRP Contractor): Mr. Folsom stated that the project is going well, and sampling results have been consistent. The remedy in place for OU-1 was successful. The remedy implemented for OU-2 was successful during its implementation between 1997 and 2009. The remedy had begun reaching diminishing returns due to the reduction in overall groundwater concentrations. That, coupled with a wildfire that occurred in 2009 and destroyed much of the treated groundwater disposal system, prompted an opportunity to conduct natural attenuation with monitoring as a potential alternative remedy. Mr. Folsom stated that subsequent monitoring events, supplemental remedial investigation, and data evaluation have supported that monitored natural attenuation with the appropriate institutional controls currently in place appears to be a favorable remedy alternative.

Mr. Folsom stated that key monitoring data trends demonstrate a stable or reducing plume for the COC, sodium. Groundwater concentrations for the radiological constituents of concern (radium-226/228 and gross alpha) are representative of natural background occurrence. Tier 2 constituent (lead, cadmium, benzene, PCE, and vinyl chloride) monitoring has revealed the presence of the constituent benzene at a single well on site slightly above the remedial goal.

The OU-1 landfill is regularly mowed and maintained. The Site is visited for inspection on a regular basis, approximately monthly. These inspections include confirmation of site security controls, interior road accessibility, and monitoring wells. Mr. Folsom stated that there have not been any unexpected O&M difficulties or costs at the Site since start-up or in the last five years. The groundwater monitoring program was postponed in 2020 out of abundance of caution during the COVID-19 pandemic. The monitoring program will be reinitiated in 2021. The O&M Plan is being updated for the Site to optimize maintenance and sampling activities.

The operation of the OU-2 groundwater system has been suspended since 2009. Mr. Folsom stated that with the institutional controls that are established for the Site and surrounding area, the protectiveness of the remedy has not been affected. Given the elimination of radionuclides as COCs and the stability of sodium in groundwater monitoring events, Mr. Folsom suggested that optimization of the groundwater monitoring program seems appropriate. The O&M Plan is intended to optimize the monitoring strategy for future events.

Killian Talley, FL DEP Project Manager: Mr. Talley has an overall positive impression of the project, including cleanup, maintenance and reuse activities. He stated that monitoring has confirmed that area extent and magnitude of the plume has been reduced by previous remedial activities; however, lingering exceedances and migration remain unaddressed. He is not aware of any complaints or inquiries regarding site-related environmental issues or remedial activities from residents in the past five years. During the past five years, FDEP continues to review reports and meet with the EPA and the PRP to discuss site conditions. He is not aware of any changes to state laws that might affect the protectiveness of the Site's remedy and is comfortable with the status of the institutional controls. Mr. Talley is not aware of any changes in projected land use at the Site.

Data Review

OU-1

Data associated with the periodic monitoring of OU-1 surface water and OU-1 groundwater quality are no longer required.

OU-2

Current OU-2 groundwater monitoring is focused on the two contaminated groundwater plumes, one within the shallow surficial aquifer (up to 30 feet below land surface) and one within the deep surficial aquifer (up to about 130 feet below land surface). The groundwater plumes contain elevated levels of Tier 1 COCs: sodium, radium 226 + radium 228, and gross alpha. Since the shutdown of the groundwater remediation system in April 2009, the PRP performs groundwater monitoring semi-annually at up to 23 shallow surficial aquifer wells, two confining layer wells, and 21 deep surficial aquifer wells (Figure 3). The samples are analyzed for Site's Tier 1 COCs.

At the EPA's request, groundwater samples were also analyzed for Tier 2 contaminants – cadmium, lead, benzene, tetrachloroethene and vinyl chloride – at select wells during the June 2019 sampling event. Semi-annual reports submitted to the EPA and the state present the results of the sampling. Table I-1 in Appendix I includes a summary of Tier 1 sampling results between 1995 and 2019. Table I-2 includes a summary of the 2019 Tier 2 sampling results.

In 2018, the PRP completed a supplemental investigation to support refinement of the CSM and OU-2 remedy optimization activities. As part of the investigation, the PRP field analyzed 168 groundwater intervals for sodium. Another 14 groundwater samples and two sediment samples were sent off-site for laboratory analysis. The January 2019 Operable Unit 2 Supplemental Remedy Investigation (OU-2 Supplemental RI) report presents the results from the investigation.

The PRP also completed a radionuclides supplemental investigation in 2019, with results presented to the EPA during subsequent technical meetings and summarized in a February 2021 Summary of OU-2 Radionuclide Investigations memorandum. During this supplemental investigation, the PRP conducted a surface gamma survey throughout the facility, as well as sampling and radionuclide analysis of sediment, surface water, landfill leachate, and groundwater.

This FYR Report evaluates and summarizes the data presented in the semi-annual reports as well as the supplemental investigation reports. In general, the monitoring data indicate:

- Sodium concentrations continue to exceed the OU-2 ROD cleanup goal of 160 milligrams per liter (mg/L) in both the shallow and deeper surficial aquifers. During the most recent sampling event in June 2019, five surficial aquifer wells, one confining layer well and six deep surficial aquifer wells had sodium concentrations above the OU-2 ROD cleanup goal.
- The extent of the shallow surficial aquifer sodium plume has decreased from 34 acres at the onset of the OU-2 remedy (1994–1995) to 9 acres as of 2018. The extent of the deep surficial aquifer sodium plume has increased from 4 acres in 1994–1995 to 7.3 acres in 2018, due to vertical migration of contaminants.
- Most wells on site have stable or decreasing sodium concentration trends.

- Radionuclides in groundwater appear to be a naturally occurring condition.
- Of the wells sampled for Tier 2 contaminants, only one well reported a Tier 2 contaminant above state or federal MCLs. The extent of this contamination is defined.

Additional discussion of recent shallow and deep surficial aquifer data for sodium, radionuclides and Tier 2 contaminants and the 2018 sediment data are presented below.

Sodium

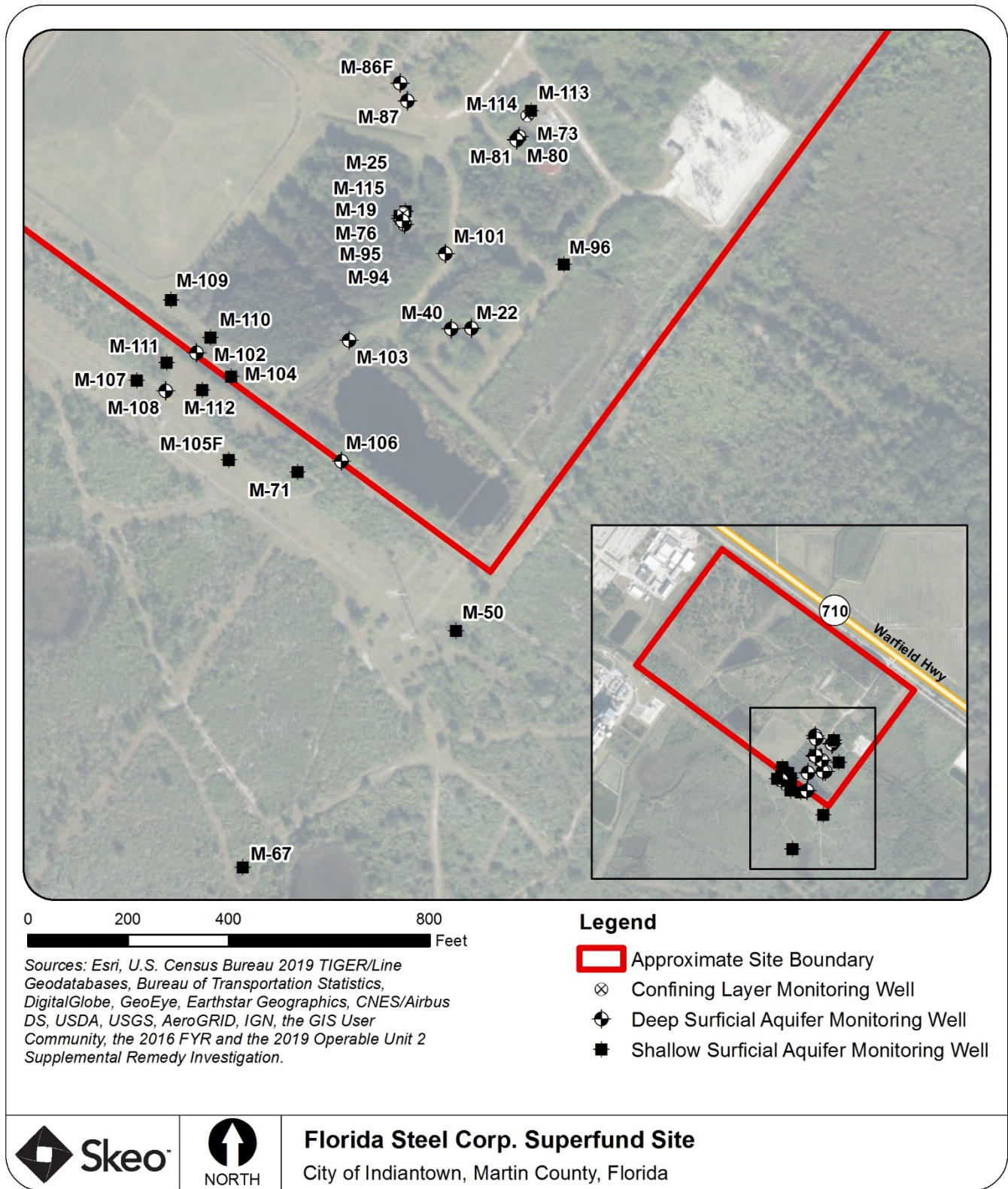
Sodium is the most prevalent COC detected in groundwater above the ROD cleanup goal in both the shallow and deep surficial aquifers. Figures I-1 and I-2 in Appendix I show the June 2019 extent of sodium concentrations in the shallow and deep surficial aquifers, respectively. Table I-1 in Appendix I summarizes historical groundwater data from monitoring wells.

Figure I-1 shows that the current extent of sodium contamination in the shallow surficial aquifer is much smaller than the original plume boundaries from the remedial design in 1994–1995. As of June 2019, the remaining sodium plume in the shallow surficial aquifer is near wells RW-4, M-104, M-110, M-111, M-112 and M-19 in the southern corner of the Site beneath the wetland area (Figure I-1, Appendix I). All other monitoring wells reported sodium concentrations below the cleanup goal in June 2019. The OU-2 Supplemental RI report suggests the wetland may be affecting natural attenuation mechanisms through surface and groundwater interactions.

The OU-2 Supplemental RI report evaluated sodium concentration trends in the shallow surficial aquifer wells using a statistical analysis software program. From 2009 to present, during inactive pumping conditions, statistical analyses identified increasing sodium trends in well M-67 and probable increasing trends in wells M-107 and M-111. All other shallow surficial aquifer wells reported stable, decreasing, probably decreasing or no trend with respect to sodium concentrations (Figure I-3). Of those wells with increasing or probably increasing trends, only M-111 has a sodium concentration above the groundwater cleanup goal (180 mg/L in June 2019). Although the statistical evaluation showed an increasing trend when considering data back to 2009, the sodium concentrations in M-111 have been generally stable during this FYR period, with concentrations ranging between 160 mg/L in April 2017 and 210 mg/L in December 2017. The OU-2 Supplemental RI report found no evidence of an ongoing source to groundwater. The report also concluded that site conditions appear to be favorable for continuing monitored natural attenuation.

As of June 2019, six deep surficial aquifer wells had sodium concentrations above the OU-2 ROD cleanup goal of 160 mg/L (Table I-1, Appendix I). Highest concentrations were reported in M-73 (320 mg/L (qualified as an estimated value)) and in M-76 (390 mg/L), both of which are screened in the upper portion of the deep surficial aquifer.

Figure 3: Monitoring Well Map



Disclaimer: This map and any boundary lines within the map are approximate and subject to change. The map is not a survey. The map is for informational purposes only regarding the EPA's response actions at the site.

Figure I-2 shows that the deep sodium plume has migrated south beyond the original deep plume boundaries from the remedial design. Well M-102, located along the southern property boundary, reported a sodium concentration of 230 mg/L in June 2019, above the sodium cleanup goal of 160 mg/L. Well M-102 is screened deeper than M-73 and M-76 and just above the top of the impermeable silty clayey limestone layer. These data show that sodium contamination has migrated further south and downward through the aquifer. Statistical analyses included in the OU-2 Supplemental RI report found an increasing sodium concentration trend in M-102. Although well M-102 reports an increasing trend, wells downgradient of this location, M-108 and DR-4, do not exceed the sodium cleanup goal and both wells report either no trend or stable or decreasing trends (Figure I-4, Appendix I). The extent of contamination in the deep aquifer appears to be delineated to the south.

Statistical analyses also found increasing sodium concentration trends in wells M-106, M-76 and M-80 and probably increasing trends in M-67, using data from 2009 to 2018 (Figure I-4). Of those locations, only well M-76 continues to exceed the groundwater cleanup standard.

Radionuclides (radium 226 + radium 228 and gross alpha)

Radium 226 + radium 228 and gross alpha were detected above the OU-2 ROD cleanup goals in a limited number of shallow and deep surficial aquifer wells during this FYR period (Table I-1 in Appendix I). Based on the additional investigations conducted in 2019 and presented in the February 2021 Summary of OU-2 Radionuclide Investigations memorandum and multiple lines of evidence, the EPA has concluded that the radionuclides at the Site are a naturally-occurring condition that is not a current or future concern at the Site. The EPA's assessment is based on the following:

- A surface survey performed in early 2019 according to industry standards and Florida Department of Health (FDOH) procedures confirmed no radionuclide source area at the Site.
- Radionuclide concentrations at the Site are lower than those resulting from typical operational steel mill activities.
- There is no presence of radioactivity in surface ponds.
- There is no source of radioactivity in landfill leachate samples.
- There is no geographic pattern to the presence of radionuclides in groundwater monitoring wells.
- There is no statistical correlation between sodium concentrations and radionuclides.
- The relationship between radium-226 and uranium suggests background contribution.

Figure I-5 depicts the June 2019 extent of radionuclide concentrations in the deep surficial aquifer.

Tier 2 Contaminants

Shallow surficial aquifer monitoring wells M-19, M-25 and M-5 were analyzed for the Tier 2 contaminants lead and cadmium in June 2019. The wells and parameters selected were based on historical detections in these wells in the early 1990s. Detected total and dissolved concentrations were below the federal and state MCLs for lead and cadmium in all wells sampled (Table I-2, Appendix I).

Deep surficial aquifer monitoring wells M-22, M-73, M-80 and M-86 were analyzed for lead, cadmium, benzene, tetrachloroethene or vinyl chloride, depending on the well. Benzene in MW-86 was detected at 0.0015 mg/L, compared to the state MCL of 0.001 mg/L (federal MCL is 0.005 mg/L). All other contaminants were either not detected or were detected below federal and state MCLs.

Sediment

The PRP collected sediment samples at two basin areas during the supplemental RI to determine if sediment may be a residual source of sodium contamination (Figure I-7, Appendix I). Sodium results were below 20 mg/kg except for one sample collected from P02 at the 0-0.5 ft depth interval.

The sample contained sodium at 660 mg/kg. The sample was noted to contain the root material from basin vegetation. Based on the data, the supplemental RI report concluded an ongoing source to groundwater is not likely present.

Site Inspection

The PRP conducted a limited site inspection for this FYR. Luis Nieves (Environmental Director, Gerda Ameristeel) visited the Site on March 3 and 4, 2021. During the inspection, the PRP representative observed two animal burrows within the fenced area of the landfill. The PRP anticipates an additional inspection for burrows by licensed personnel in the second quarter of 2021. The additional inspection will confirm the nature of the burrows and perform appropriate corrective measures, including animal relocation in accordance with Florida Fish Wildlife Conservation Commission regulations, if appropriate. The PRP will evaluate additional measures to prevent entry of animals to the landfill area and implement such measures, if appropriate.

The fence around the landfill perimeter is in good condition and there are no breaches or torn chain link fabric; the fence is not leaning. The gate is secured with a steel cable and padlock. There are no trees or bushes or other excessive vegetation growth on the landfill and there are no signs of erosion due to loss of vegetation cover. There is evidence of excessive vegetation growth (grass) at the entry end of the letdown pipe and the exit of the pipe at the toe of the landfill berm. During the site inspection, the PRP representative cleared the vegetation by hand to expose the pipe and perform an inspection; no visible signs of erosion or plugging was detected. Routine vegetation clearing of the four drainage letdown channels on the top of the landfill is scheduled for the second quarter of 2021 during the dry season and in coordination with mowing of the landfill slide slopes, top and perimeter areas.

During the inspection, the PRP representative observed some wells in need of maintenance. In the second quarter of 2021 as part of the annual groundwater monitoring event, the PRP anticipates replacing locks on all wells; relabeling wells as needed with ID numbers; and installing locking caps and clearing vegetation growth as needed around wells to ensure wells can be visually located.

On March 4, 2021, Luis Nieves visited the Indiantown Public Library to check the status of the document repository for the Site. The library had several CDs of site documents, including the OU-1 Administrative Record, OU-2 Administrative Record, and the July 2013 ESD. All CDs had been created in April 2016.

Photographs taken during the visit are in Appendix H and the site inspection checklist is in Appendix G.

V. TECHNICAL ASSESSMENT

QUESTION A: Is the remedy functioning as intended by the decision documents?

The review of site documents, Applicable or Relevant and Appropriate Requirements (ARARs) and the site inspection indicate that the remedy for OU-1 is functioning as intended by the ROD. However, since the remediation system was shut down, the remedy for OU-2 is not functioning as intended except for semi-annual monitoring. The EPA currently approves of this approach.

The 2013 ESD requires institutional controls to protect the remedy and to ensure protectiveness; the necessary institutional controls are in place for both OU-1 and OU-2. The 1990 restrictive covenant limits land use and Florida's groundwater delineation serves to restrict contaminated groundwater use. In addition, Gerdau Ameristeel added property information and detailed land and groundwater use restrictions in a restrictive covenant in 2015.

OU-1

The OU-1 remedy is functioning as intended by the decision documents for the Site. Contaminated soils were excavated, consolidated, stabilized/solidified and placed under a vegetated soil cover in the on-site RCRA cap landfill. Access to the landfill is restricted by a security fence and signs are in place around the perimeter of the landfill. The vegetative cover is in good condition. During the site inspection, the PRP representative noted some needed O&M activities related to burrows on the cap, clearing of the letdown channels, and well maintenance; the PRP anticipates completing these activities during the second quarter of 2021. Sampling for OU-1 COCs in groundwater and surface water monitoring is no longer required. The PRP is updating the O&M plan to reflect the current EPA-approved sampling schedule.

OU-2

The OU-2 groundwater remediation system was shut down in 2009 after a wildfire destroyed parts of the system. The system is now in a dilapidated state. Since 2009, PRP contractors have monitored site groundwater semi-annually for natural attenuation. Sodium data presented in the semi-annual reports and the 2019 OU-2 Supplemental RI report indicate that:

- Sodium concentrations continue to exceed the OU-2 ROD cleanup goal in the shallow and deeper surficial aquifers. Most wells on site have stable or decreasing sodium concentration trends.
- The extent of the shallow surficial aquifer sodium plume has decreased from 34 acres at the onset of the OU-2 remedy to 9 acres as of 2018. The extent of the deep surficial aquifer sodium plume has increased from 4 acres to 7.3 acres in 2018, due to vertical migration of contaminants.
- The OU-2 Supplemental RI report found no evidence of an ongoing source to groundwater. The report also concluded that site conditions appear to be favorable for continuing monitored natural attenuation.

Based on multiple lines of evidence, the EPA has concluded that the radionuclides at the Site are a naturally occurring condition that is not a current or future concern at the Site. In November 2019, the EPA met with FDEP and FDOH to discuss the sporadic presence of radionuclides in site groundwater and the EPA's assessment. FDEP and FDOH confirmed no concerns with the sporadic elevated radium

results in a few of the groundwater wells, which were determined to be slightly elevated natural background levels. This is not uncommon for radium in groundwater in the southeast and Florida. FDEP and FDOH do not think that these occasional elevated radium levels would be harmful to any future receptors or would necessitate remedial action.

FSC completed remediation of the Southwest Wetland in December 1995 and the maintenance and monitoring period following the remedial action continued for five years, as required.

QUESTION B: Are the exposure assumptions, toxicity data, cleanup levels and RAOs used at the time of the remedy selection still valid?

There have been some changes to toxicity data, but these changes do not affect protectiveness of the remedy. Although the selected remedies for OU-1 and OU-2 did not specify RAOs, the remedy designated cleanup levels and was designed to address remaining sources, incinerator ash, soil and sediment contamination at the Site, groundwater and the Southwest Wetland.

The OU-2 ROD selected the lower of the state and federal MCLs as the groundwater cleanup level for Site COCs. State and federal MCLs for Tier 1 and Tier 2 contaminants have not changed since the OU2 ROD (Appendix J).

The PCB soil cleanup level of 25 mg/kg was based on the Toxic Substances Control Act (TSCA) PCB Spill Cleanup Policy (40 CFR, Part 761, Subpart G) for areas with restricted access. This cleanup level remains valid. The 25 mg/kg PCB soil cleanup level is also equivalent to a cancer risk level of 3×10^{-5} , which is within the EPA's risk management range and therefore, remains protective for commercial use.¹ Soil with PCBs above 50 mg/kg were shipped off site to an approved disposal facility consistent with TSCA regulations.

The 1992 OU-1 ROD identified a lead cleanup level of 600 mg/kg in soil and sediment. The value is based on the leachability of lead from soil into groundwater. During Tier 2 contaminant sampling in 2019, lead was not detected in groundwater above the federal action level of 0.015 mg/L. Therefore, the leachability-based cleanup value for lead remains protective of groundwater. The lead cleanup level is also below the current EPA regional screening level (RSL) of 800 mg/kg for commercial/industrial exposures.

Cleanup levels remain valid, no one uses the groundwater and the expected future use of the Site remains industrial. Institutional controls prohibit excavating in the landfill area and limit the potential for exposure to remaining contaminated materials.

QUESTION C: Has any other information come to light that could call into question the protectiveness of the remedy?

No other information has come to light that could call into question the protectiveness of the remedy.

¹ The 25 mg/kg PCB soil cleanup level was compared to EPA's current cancer-based regional screening level (RSL) for high-risk PCBs under a composite worker exposure scenario (0.94 mg/kg).

VI. ISSUES/RECOMMENDATIONS

Issues/Recommendations	
OU(s) without Issues/Recommendations Identified in the FYR:	
OU-1	

Issues and Recommendations Identified in the Five-Year Review:				
OU-2:	Issue Category: Remedy Performance			
	Issue: The OU-2 remedy has been offline since 2009 and it may not be practical to restart it.			
	Recommendation: Continue groundwater monitoring to assess monitored natural attenuation (MNA) as a potential remedy. Develop site-specific criteria to evaluate the efficacy of MNA at the Site.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	PRP	EPA/State	06/31/2024

OU-2:	Issue Category: Remedy Performance			
	Issue: The OU-2 remedy has been offline since 2009 and it may not be practical to restart it.			
	Recommendation: After evaluation of MNA as a potential remedy, either repair the treatment system prescribed by the ROD or modify the ROD to change the remedy.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	EPA	EPA/State	06/31/2026

OU-2:	Issue Category: Changed Site Conditions			
	Issue: The OU-2 radionuclides (radium 226 + radium 228 and gross alpha) are naturally occurring.			
	Recommendation: Update the decision document to remove radionuclides from the list of COCs.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	EPA	EPA/State	06/31/2026

OTHER FINDINGS:

Several additional recommendations were identified during the FYR. These recommendations do not affect current and/or future protectiveness.

- Lock, label and secure all wells.
- Properly abandon wells as appropriate.
- Clear the letdown channels of excess vegetation.
- Address animal burrows.
- Finalize the updated O&M plan and to document the discontinuation of surface water sampling of OU-2 Tier 2 COCs in groundwater.

VII. PROTECTIVENESS STATEMENT

Protectiveness Statement(s)	
<i>Operable Unit:</i> OU-1	<i>Protectiveness Determination:</i> Protective
<i>Protectiveness Statement:</i> The remedy for OU-1 is protective of human health and the environment. Groundwater monitoring continues, contaminated source material and soil contamination have been excavated, stabilized, and contained in the on-site landfill. Appropriate institutional controls are in place and there are no current exposures to contamination.	

Protectiveness Statement(s)	
<i>Operable Unit:</i> OU-2	<i>Protectiveness Determination:</i> Short-term Protective
<i>Protectiveness Statement:</i> The remedy for OU-2 is currently protective of human health and the environment. Groundwater monitoring continues and appropriate institutional controls are in place. Radionuclides have been determined to be naturally occurring. Although the groundwater remediation system is not operating as designed, there are no exposures to contamination and site conditions appear to be favorable for continuing monitored natural attenuation. For the remedy to be protective in the long-term, the MNA evaluation needs to be completed and the OU-2 decision document modified.	

Sitewide Protectiveness Statement	
<i>Protectiveness Determination:</i> Short-term Protective	
<i>Protectiveness Statement:</i> Because the remedy at OU-2 is protective in the short-term, the Site's remedy is protective of human health and the environment in the short-term. To be protective in the long-term, the MNA evaluation needs to be completed and the OU-2 decision document modified.	

VIII. NEXT REVIEW

The next FYR Report for the Florida Steel Corp. Superfund Site is required five years from the completion date of this review.

APPENDIX A – REFERENCE LIST

Declaration of Covenants, Conditions and Restrictions, Florida Steel Corporation, Indiantown Mill, Martin County, Florida, dated August 1990.

Declaration of Restrictive Covenants, Gerdau Ameristeel, Indiantown Mill, Martin County, Florida, dated April 2015.

Feasibility Study Report, Operable Unit 2, Florida Steel Corporation, Indiantown Mill, Martin County, Florida, Revision No. 1, Ardaman & Associates, Inc., November 23, 1993.

Florida Steel, Indiantown Superfund Site Update. August 22, 2018. EPA Region 4. Meeting Minutes.

Florida Steel, Indiantown Superfund Site Meeting. November 1, 2019. EPA Region 4. Meeting Minutes.

Fourth Five-Year Review Report for Florida Steel Corporation Indiantown Martin County, Florida. EPA. August 16, 2016.

Gerdau Ameristeel Indiantown Mill Site 2019 Institutional Control Update. March 7, 2019.

Indiantown Vault Tortoise Relocation Summary Report, Gerdau-Former Indiantown Mill, Indiantown, Florida. CB&I Environmental & Infrastructure, Inc. December 14, 2016.

Memorandum: Results of Groundwater Sampling Event in April 2017 for Operable Unit 2, Gerdau Ameristeel, Indiantown Mill, Martin County, Florida. Florida Department of Environmental Protection. September 29, 2017.

Memorandum: Second Quarterly Report for 2016 for Operable Unit 2, Florida Steel Company, Gerdau Indiantown Mill, Martin County, Florida. Florida Department of Environmental Protection. August 4, 2016.

Memorandum: Results of Groundwater Sampling Event in April 2017 for Operable Unit 2, Gerdau Ameristeel Indiantown Mill, Martin County, Florida. Florida Department of Environmental Protection. September 29, 2017.

Operable Unit 2 Supplemental Remedy Investigation for Florida Steel Indiantown Superfund Site, Indiantown, Martin County, Florida. Prepared by HSW Engineering, Inc. January 2019.

Operation and Maintenance Manual Groundwater Remediation and Spray Irrigation System for Operable Unit 2, Gerdau AmeriSteel Indiantown Mill, Martin County, Florida, dated November 1997.

Operation & Maintenance Plan and Performance Standards Verification Plan, Operable Unit 1, AmeriSteel Indiantown Mill, Martin County, Florida, dated August 1996.

Presentation: Florida Steel Corporation Superfund Site. HSW Engineering, Inc. August 2018.

Presentation: Florida Steel Corporation Superfund Site. HSW Engineering, Inc. April 2019.

Presentation: Florida Steel Corporation Superfund Site. HSW Engineering, Inc. September 2019.

Radionuclides in Florida Drinking Water: An Interim Report. Florida Department of Health and Rehabilitative Services, Office of Radiation Control, Environmental Radiation Control Section. May 1983.

Remedial Investigation Report - Phase I, Florida Steel Corporation, Indiantown Mill Site, Martin County, Florida, Volume 1, Ardaman & Associates, Inc., September 30, 1988.

Remedial Investigation Report - Phase II, Florida Steel Corporation, Indiantown Mill Site, Martin County, Florida, Volume 1, Ardaman & Associates, Inc., October 17, 1989.

Remedial Design Work Plan, Operable Unit 1, Florida Steel Corporation, Indiantown Mill, Martin County, Florida, Revision No. 1, Ardaman & Associates, Inc., May 10, 1993.

Remedial Design Report, Operable Unit 1, Florida Steel Corporation, Indiantown Mill, Martin County, Florida, Volume I, Project History and Remedial Design, Revision No. 0, Ardaman & Associates, Inc., September 9, 1994.

Remedial Design Report, Operable Unit 1, Florida Steel Corporation, Indiantown Mill, Martin County, Florida, Volume 11, Treatability Study, Revision No. 0, Ardaman & Associates, Inc., September 9, 1994.

Remedial Design Report, Operable Unit 1, Florida Steel Corporation, Indiantown Mill, Martin County, Florida, Volume III, Technical Specifications, Revision No. 0, Ardaman & Associates, Inc., September 9, 1994.

Remedial Design Work Plan, Operable Unit 2, Florida Steel Corporation, Indiantown Mill, Martin County, Florida, Revision No. I, Ardaman & Associates, Inc., January 16, 1995.

Remedial Design and Remedial Action Work Plan, Remediation of Southwest Wetland, Florida Steel Corporation, Indiantown Mill, Martin County, Florida, Revision No. 1, May 10, 1995.

Remedial Action Work Plan, Remediation of Groundwater Plume, Operable Unit 2, Florida Steel Corporation, Indiantown Mill, Martin County, Florida, Revision No. 1, Ardaman & Associates, Inc., February 15, 1996.

Results of Groundwater Sampling Event in September 2016 for Operable Unit 2 Gerdau Ameristeel Indiantown Mill Martin County, Florida. Prepared by Ardaman & Associates, Inc. December 23, 2016.

Results of Groundwater Sampling Event in April 2017 for Operable Unit 2 Gerdau Ameristeel Indiantown Mill Martin County, Florida. Prepared by Ardaman & Associates, Inc. July 25, 2017.

Results of Groundwater Sampling Event in December 2017 for Operable Unit 2 Gerdau Ameristeel Indiantown Mill Martin County, Florida. Prepared by Ardaman & Associates, Inc. March 21, 2018.

Results of Groundwater Sampling Event in April 2018 for Operable Unit 2 Gerdau Ameristeel Indiantown Mill Martin County, Florida. Prepared by Ardaman & Associates, Inc. August 7, 2018.

Results of Groundwater Sampling Event in November-December 2018 for Operable Unit 2 Gerdau Ameristeel Indiantown Mill Martin County, Florida. Prepared by Ardaman & Associates, Inc. April 19, 2019.

Results of Groundwater Sampling Event in June 2019 for Operable Unit 2 Gerdau Ameristeel Indiantown Mill Martin County, Florida. Prepared by Ardaman & Associates, Inc. October 31, 2019.

Second Five-Year Review Report for Gerdau Ameristeel Indiantown Mill Formerly known as Florida Steel Corporation Indiantown Martin County, Florida. Ardaman & Associates, Inc., April 2006.

Second Quarterly Report for 2016, Remediation of Groundwater Plume, Operable Unit 2, Gerdau Ameristeel Indiantown Mill, Martin County, Florida. Prepared by Ardaman & Associates, Inc. July 21, 2016.

Seventh Report on Groundwater Remediation Program for Operable Unit 2, Gerdau Ameristeel Indiantown Mill, Martin County, Florida, dated April 13, 2009.

Sixth Report on Groundwater Remediation Program for Operable Unit 2, Gerdau Ameristeel Indiantown Mill, Martin County, Florida, dated June 6, 2008.

United States Environmental Protection Agency, Record of Decision (ROD). The Declaration for Operable Unit One, Florida Steel Corporation, June 30, 1992.

United States Environmental Protection Agency, Record of Decision (ROD), the Declaration for Operable Unit Two, Florida Steel Corporation, March 30, 1994.

APPENDIX B – CURRENT SITE STATUS

Environmental Indicators

- *Current human exposures at the Site are under control.*
- *Current groundwater migration is under control.*

Are Necessary Institutional Controls in Place?

All Some None

Has EPA Designated the Site as Sitewide Ready for Anticipated Use?

Yes No

Has the Site Been Put into Reuse?

Yes No

APPENDIX C – SITE CHRONOLOGY

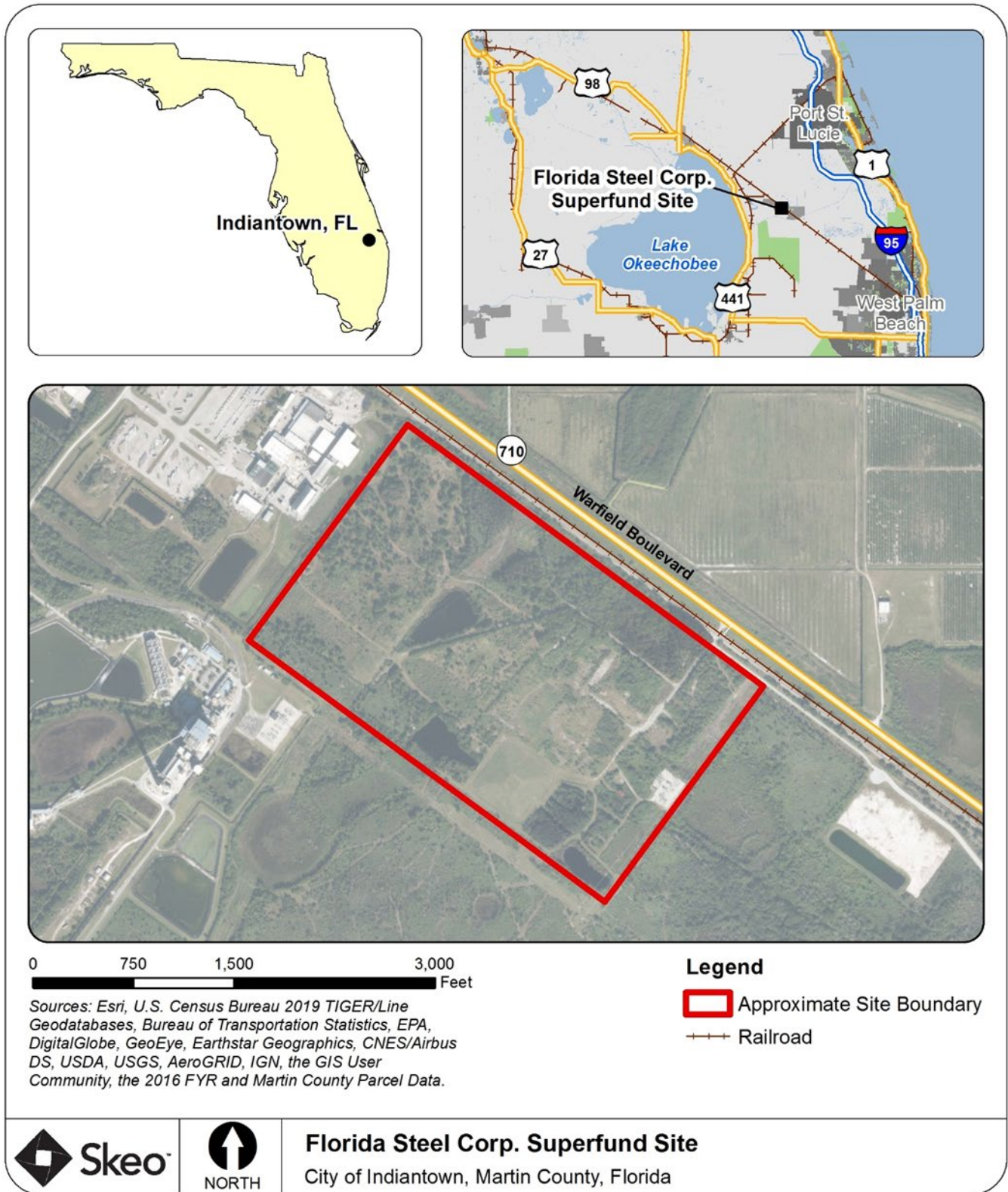
Table C-1: Site Chronology

Event	Date
FSC operated a steel mill at the Site	November 1970 - February 1982
FDER conducted a RCRA compliance inspection and identified piles of EC dust as possible RCRA violations	1981
The EPA proposed the Site for listing on the NPL	December 30, 1982
FDER discovered some site soils were contaminated with PCBs	March 1983
The EPA placed the Site on the NPL	September 8, 1983
FSC completed the PCB remedial action plan	August 25, 1985
FSC and FDER entered into a Consent Agreement	September 4, 1985
FSC initiated a periodic groundwater monitoring program	1986
FSC initiated PCB-contaminated soil excavation efforts	February 15, 1986
FSC completed a PCB-contaminated soil excavation and placed soils in on-site vault	May 8, 1986
FSC completed an FS for treatment options of PCB-contaminated soils	October 2, 1986
FSC and FDER entered into an Administrative Order on Consent for treatment of PCB-contaminated soils	September 21, 1987
FSC and FDER entered into an Administrative Order on Consent for an RI/FS	May 30, 1988
FSC initiated and completed incineration of PCB-contaminated soil in on-site vault	October 1987 - May 1988
FSC completed Phase 1 of the RI	September 30, 1988
FSC completed Phase 2 of the RI	October 17, 1989
FSC filed a Restrictive Covenant	August 22, 1990
The EPA issued Wetland Impact Study Report (OU-1)	May 1991
The EPA issued OU-1 ROD	June 30, 1992
FSC initiated remedial design for OU-1	February 10, 1993
The EPA and FSC signed a Consent Decree for OU-1	February 19, 1993
The EPA issued OU-2 ROD	March 30, 1994
FSC completed remedial design for OU-1	September 21, 1994
FSC initiated remedial design for OU-2	October 3, 1994
The EPA and FSC signed a Consent Decree for OU-2	January 24, 1995
FSC's contractors excavated and restored northern portion of Southwest Wetland	July 1995 to December 1995
FSC completed remedial design for OU-2	June 12, 1995
The EPA received completed OU-2 remedial design; the EPA received OU-2 Performance Standards Verification Plan	February 15, 1996
The EPA and FDEP performed inspection for soil and wetlands and determined the remedy construction was appropriate and complete	April 23, 1996
The EPA and FDEP performed inspection for groundwater remediation system and determined remedy construction was appropriate and complete	February 18, 1997
FSC activated groundwater remediation system	April 24, 1997
The EPA issued Preliminary Close-Out Report	September 11, 1997
PRP contractor completed O&M Manual	November 16, 1997
The EPA issued first FYR report	January 16, 2001
The EPA issued second FYR report	April 18, 2006
A wildfire destroyed major components of the spray irrigation system; onset of monitored natural attenuation	April 2009
The EPA issued third FYR report	September 27, 2011

Event	Date
The EPA issued an ESD for OUs 1 and 2 to document the need for institutional controls at the Site	June 25, 2013
Gerdau Ameristeel filed a Restrictive Covenant	April 14, 2015
The EPA designated the Site as Sitewide Ready for Anticipated Use	April 30, 2015
The EPA issued fourth FYR report	August 16, 2016
Gerdau Ameristeel contractors issued OU-2 Supplemental RI	January 2019
Gerdau Ameristeel contractors issued February 2021 Summary of OU-2 Radionuclide Investigations memorandum	February 3, 2021

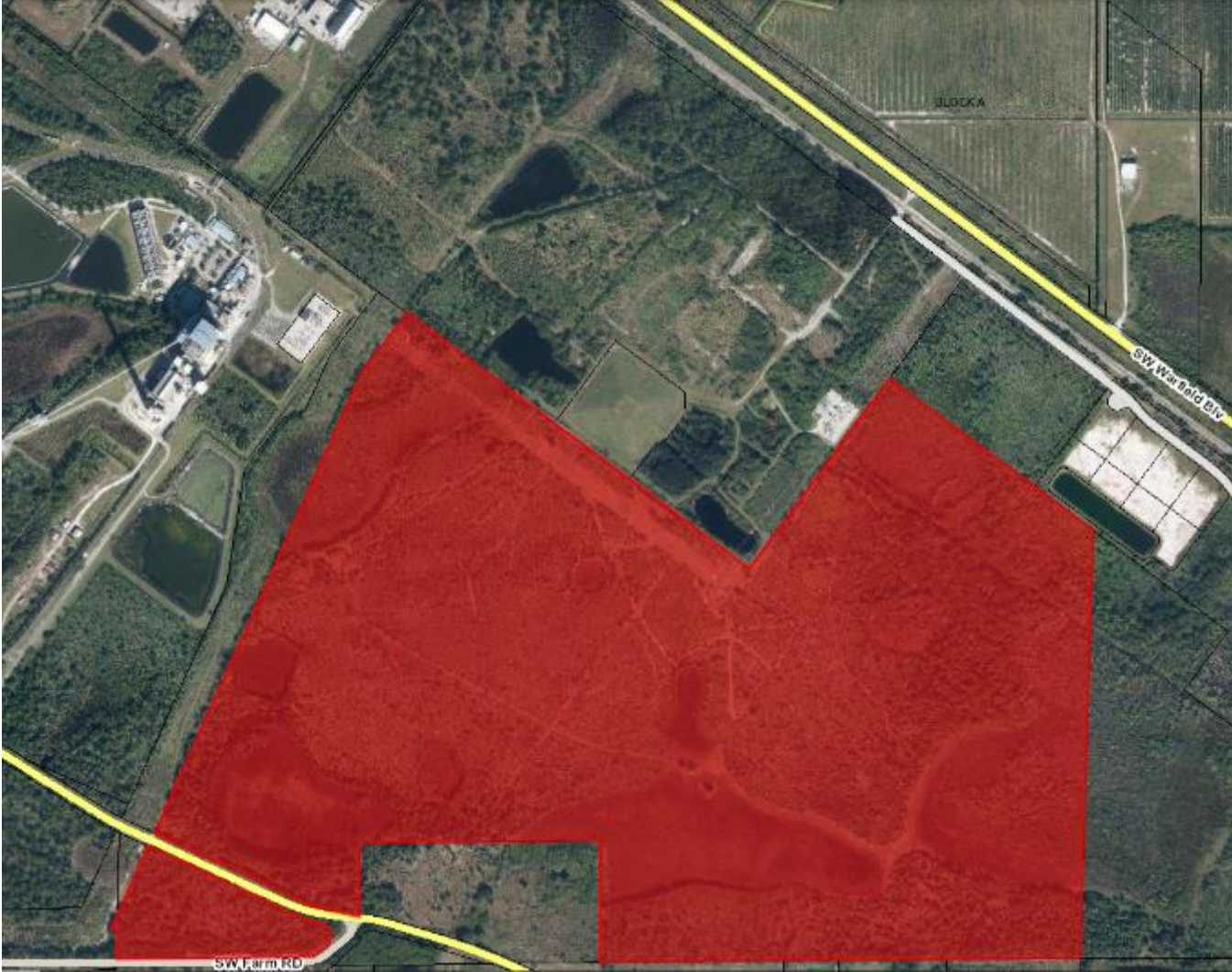
APPENDIX D – SITE MAPS

Figure D-1: Site Vicinity Map



Disclaimer: This map and any boundary lines within the map are approximate and subject to change. The map is not a survey. The map is for informational purposes only regarding the EPA's response actions at the Site.

Figure D-2: Downgradient Parcel Map



Source: Martin County Property Appraiser's Website. <https://www.pa.martin.fl.us/tools/property-map-searches>. Accessed 1/22/2021.

APPENDIX E – PRESS NOTICE



The U.S. Environmental Protection Agency, Region 4 Announces the Fifth Five-Year Review for The Florida Steel Corporation Superfund Site, Indiantown, Martin County, Florida

Purpose/Objective: EPA is conducting a Five-Year Review of the remedy for the Florida Steel Corporation Superfund site (the Site) in Indiantown, Florida. The purpose of the Five-Year Review is to make sure the selected cleanup actions effectively protect human health and the environment.

Site Background: The 151.6-acre Site is located in a rural area of Martin County, southwest of State Road 710 (Warfield Boulevard). The Site's street address is 18300 Southwest Warfield Boulevard, and it is about 2 miles northwest of the unincorporated community of Indiantown in Florida. Florida Steel Corporation (FSC), now Gerdau Ameristeel, acquired the site property in 1969 and built a steel mill for recycling scrap steel into new steel products, including concrete reinforcing steel and wrought iron. The mill operated from November 1970 to February 1982. It produced mill scale, slag, and emission control dust as byproducts. Emission control dust was collected by a system of baghouses and, until November 1980, deposited in two disposal areas on site. In 1981, the Florida Department of Environmental Regulation conducted a Resource Conservation and Recovery Act (RCRA) compliance inspection of the facility. Samples of emission control dust were obtained from uncontained waste piles. Based on sampling findings, EPA listed the 151-acre Site on the National Priorities List (NPL) in December 1982. Contaminants of concern included lead, zinc and polychlorinated biphenyls (PCBs) in site soils and sodium, radium, and gross alpha in site groundwater.

Cleanup Actions: To manage the cleanup, EPA divided the Site into two operable units (OUs): OU-1 (soil cleanup) and OU-2 (southwest wetland and groundwater remediation). EPA selected the final remedy for OU-1 in the Site's 1992 Record of Decision (ROD). It included excavation and off-site disposal of 600 cubic yards of PCB-contaminated soil; excavation and on-site solidification of 37,000 cubic yards of emission control dust and metals-contaminated soil and ash; control of surface water runoff during soil cleanup; disposal of all solidified material in an on-site RCRA landfill with a RCRA cap; and periodic monitoring of surface water and groundwater for up to 30 years.

EPA issued the ROD for OU-2 in 1994. The final remedy included groundwater extraction, blending of the water with clean water to meet federal and state requirements, and upgradient on-site disposal of the blended water; wetlands cleanup; and excavation and on-site solidification and disposal of lead-contaminated wetland sediment in the on-site landfill.

Five-Year Review Schedule: The National Contingency Plan requires review of remedial actions that result in any hazardous substances, pollutants or contaminants remaining at the Site above levels that allow for unlimited use and unrestricted exposure every five years to ensure the protection of human health and the environment. The fifth of the Five-Year Reviews for the Site will be completed by August 2021. When the Five-Year Review is completed, it will be available online at: <https://www.epa.gov/superfund/search-superfund-five-year-reviews>.

EPA Invites Community Participation in the Five-Year Review Process: EPA is conducting this Five-Year Review to evaluate the effectiveness of the Site's remedy and to ensure that the remedy remains protective of human health and the environment. As part of the Five-Year Review process, EPA staff is available to answer any questions about the Site. Community members who have questions about the Site or the Five-Year Review process, or who would like to participate in a community interview, are asked to contact:

Joydeb Majumder, EPA Remedial Project Manager	L'Tonya Spencer-Harvey, EPA Community Involvement Coordinator
Phone: (404) 562-9121	Phone: (404) 562-8463
Email: majumder.joydeb@epa.gov	Email: spencer.latonya@epa.gov

Mailing Address: U.S. EPA Region 4, 61 Forsyth Street, S.W., 11th Floor, Atlanta, GA 30303-8960

Additional information is available at the Site's local document repository, located at the Martin County Library System, 15200 SW Adams Avenue, Indiantown, FL 34956 (consider contacting the library to confirm it is open), and online at: www.epa.gov/superfund/florida-steel-corp

APPENDIX F – INTERVIEW FORMS

FLORIDA STEEL CORP. SUPERFUND SITE FIVE-YEAR REVIEW INTERVIEW FORM	
Site Name: Florida Steel Corp.	
EPA ID: FLD050432251	
Interviewer name: Amanda Goyne	Interviewer affiliation: Skeo
Subject name: Steven Folsom	Subject affiliation: HSW Consulting
Subject contact information: sfolsom@hsweng.com	
Interview date: 3/1/2021	Interview time: n/a
Interview location: n/a	
Interview format (circle one): In Person Phone Mail Email Other:	
Interview category: PRP Contractor	

1. What is your overall impression of the project, including cleanup, maintenance and reuse activities (as appropriate)?

The project is going well, and sampling results have been consistent.

2. What is your assessment of the current performance of the remedy in place at the Site?

The remedy in place for OU1 was successful. The remedy implemented for OU2 was successful during its implementation between 1997-2009. The remedy had begun reaching diminishing returns due to the reduction in overall groundwater concentrations. That, coupled with a wildfire that occurred in 2009 and destroyed much of the treated groundwater disposal system, prompted an opportunity to conduct Natural Attenuation with Monitoring as a potential alternative remedy. Subsequent monitoring events, supplemental remedial investigation, and data evaluation have supported that monitored natural attenuation with the appropriate institutional controls currently in place appears to be a favorable remedy alternative.

3. What are the findings from the monitoring data? What are the key trends in contaminant levels that are being documented over time at the Site?

Key monitoring data trends demonstrate a stable or reducing plume for the constituent of concern, Sodium. Groundwater concentrations for the radiological constituents of concern (Radium-226/228 and Gross Alpha) are representative of natural background occurrence. Tier 2 constituent (Lead, Cadmium, Benzene, Tetrachloroethene, and Vinyl Chloride) monitoring has revealed the presence of the constituent benzene at a single well on-site slightly above the remedial goal.

4. Is there a continuous on-site O&M presence? If so, please describe staff responsibilities and activities. Alternatively, please describe staff responsibilities and the frequency of site inspections and activities if there is not a continuous on-site O&M presence.

No. The OU1 landfill is regularly mowed and maintained. The site is visited for inspection on a regular basis, approximately monthly. These inspections include confirmation of site security controls, interior road accessibility, and monitoring wells.

5. Have there been any significant changes in site O&M requirements, maintenance schedules or sampling routines since start-up or in the last five years? If so, do they affect the protectiveness or effectiveness of the remedy? Please describe changes and impacts.

The operation of the OU2 groundwater system has been suspended since 2009. With the Institutional Controls that are established for the site and surrounding area, the protectiveness of the remedy has not been affected.

6. Have there been unexpected O&M difficulties or costs at the Site since start-up or in the last five years? If so, please provide details.

No. The groundwater monitoring program was postponed in 2020 out of abundance of caution during the COVID epidemic. The monitoring program will be reinitiated in 2021.

7. Have there been opportunities to optimize O&M activities or sampling efforts? Please describe changes and any resulting or desired cost savings or improved efficiencies.

An Operation & Maintenance Plan is being updated for the site to optimize maintenance and sampling activities.

1. Do you have any comments, suggestions or recommendations regarding O&M activities and schedules at the Site?

Given the elimination of radionuclides as constituents of concern and the stability of sodium in groundwater monitoring events, optimization of the groundwater monitoring program seems appropriate. The Operation & Maintenance Plan is intended to optimize the monitoring strategy for future events.

2. Do you consent to have your name included along with your responses to this questionnaire in the FYR report?

Yes.

FLORIDA STEEL CORP. SUPERFUND SITE FIVE-YEAR REVIEW INTERVIEW FORM	
Site Name: Florida Steel Corp.	
EPA ID: FLD050432251	
Interviewer name: Amanda Goyne	Interviewer affiliation: Skeo
Subject name: Killian Talley	Subject affiliation: State Agency Project Manager
Subject contact information: Killian.Talley@dep.state.fl.us	
Interview date: 3/11/2021	Interview time: NA
Interview location: NA	
Interview format (circle one): In Person Phone Mail Email Other:	
Interview category: State Agency	

1. What is your overall impression of the project, including cleanup, maintenance and reuse activities (as appropriate)?
Positive.
2. What is your assessment of the current performance of the remedy in place at the Site?
Monitoring has confirmed that area extent and magnitude of the plume has been reduced by previous remedial activities. However, lingering exceedances and migration remain unaddressed.
3. Are you aware of any complaints or inquiries regarding site-related environmental issues or remedial activities from residents in the past five years?
No.
4. Has your office conducted any site-related activities or communications in the past five years? If so, please describe the purpose and results of these activities.
The DEP continues to review reports (Supplemental Remedy Investigation & Groundwater Sampling Events) and meet with EPA and PRP to discuss site conditions. Monitoring continues.
5. Are you aware of any changes to state laws that might affect the protectiveness of the Site's remedy?
No.
6. Are you comfortable with the status of the institutional controls at the Site? If not, what are the associated outstanding issues?
Yes.
7. Are you aware of any changes in projected land use(s) at the Site?
No.
8. Do you have any comments, suggestions or recommendations regarding the management or operation of the Site's remedy?
No.
9. Do you consent to have your name included along with your responses to this questionnaire in the FYR report?
Yes.

Contact	_____	_____	_____	_____
Name	_____	Title	Date	Phone No.
Problems/suggestions <input type="checkbox"/> Report attached: _____				
4. Other Interviews (optional) <input type="checkbox"/> Report attached: _____				
III. ON-SITE DOCUMENTS AND RECORDS VERIFIED (check all that apply)				
1. O&M Documents				
<input type="checkbox"/> O&M manual	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	
<input type="checkbox"/> As-built drawings	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	
<input type="checkbox"/> Maintenance logs	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	
Remarks: <u>As built documents/drawings and other relevant documents retained by Gerdau, Ardaman and Associates, and HSW Engineering</u>				
2. Site-Specific Health and Safety Plan				
<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A		
<input type="checkbox"/> Contingency plan/emergency response plan	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	
Remarks: _____				
3. O&M and OSHA Training Records				
<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A		
Remarks: _____				
4. Permits and Service Agreements				
<input type="checkbox"/> Air discharge permit	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	
<input type="checkbox"/> Effluent discharge	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	
<input type="checkbox"/> Waste disposal, POTW	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	
<input type="checkbox"/> Other permits: _____	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	
Remarks: _____				
5. Gas Generation Records				
<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A		
Remarks: _____				
6. Settlement Monument Records				
<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A		
Remarks: _____				
7. Groundwater Monitoring Records				
<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A		
Remarks: <u>Records on file at Gerdau, HSW Engineering, and Ardaman and Associates offices.</u>				
8. Leachate Extraction Records				
<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A		
Remarks: <u>See section D4 below.</u>				
9. Discharge Compliance Records				
<input type="checkbox"/> Air	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	
<input type="checkbox"/> Water (effluent)	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	
Remarks: _____				

10. **Daily Access/Security Logs** Readily available Up to date N/A

Remarks: Access to the site is limited via a locked entrance gate. Gerdau, Macallister Construction, Ardaman, and HSW Engineering personnel enter the site to perform work related to the Consent Agreement/ROD. FPL electrical utility personnel enter the site through the main access road to operate/maintain an electrical substation located on the site.

IV. O&M COSTS

1. **O&M Organization**

State in-house Contractor for state
 PRP in-house Contractor for PRP
 Federal facility in-house Contractor for Federal facility

Shared - Gerdau, HSW Engineering, Ardaman and Associates and Macallister Construction (site grounds contractor). Macallister has closed the business effective 12-31-20; we are currently interviewing contractors to assume the site grounds maintenance role. We expect to have a new site grounds maintenance contractor in place by April 2021.

2. **O&M Cost Records**

Readily available Up to date
 Funding mechanism/agreement in place Unavailable

Original O&M cost estimate: Not available. Amounts below reported in thousands of USD. Breakdown attached

Total annual cost by year for review period if available

From: <u>01/01/2018</u>	To: <u>12/31/2018</u>	\$ <u>250 K</u>	<input type="checkbox"/> Breakdown attached
Date	Date	Total cost	
From: <u>01/01/2019</u>	To: <u>12/31/2019</u>	\$ <u>225 K</u>	<input type="checkbox"/> Breakdown attached
Date	Date	Total cost	
From: <u>01/01/2020</u>	To: <u>12/31/2020</u>	\$ <u>100 K</u>	<input type="checkbox"/> Breakdown attached
Date	Date	Total cost	
From: <u>01/01/2016</u>	To: <u>12/31/2016</u>	\$ <u>120K</u>	<input type="checkbox"/> Breakdown attached
Date	Date	Total cost	
From: <u>01/01/2017</u>	To: <u>12/31/2017</u>	\$ <u>105K</u>	<input type="checkbox"/> Breakdown attached
Date	Date	Total cost	

3. **Unanticipated or Unusually High O&M Costs during Review Period**

Describe costs and reasons: 2020 costs impacted by COVID pandemic.

V. ACCESS AND INSTITUTIONAL CONTROLS Applicable N/A

A. Fencing

1. **Fencing Damaged** Location shown on site map Gates secured N/A

Remarks: Separate six foot high galvanized chain link fencing around landfill perimeter and at groundwater treatment equipment area in good condition with no tears nor collapsed/bent poles; access gates operational and locked with a shackle cable and padlock. There are warning signs approximately 2 feet by 2 feet (5 in landfill area and 4 in groundwater treatment equipment area) attached to chain link fabric approximately 5 foot above prevailing grade elevation. All signs are visible from the adjacent access road. Signs show visible fading; new identical signs are being procured and will be installed in

2q21.				
B. Other Access Restrictions				
1.	Signs and Other Security Measures	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> N/A	
Remarks: <u>Site entrance access gate located at intersection with SR710 and rail crossing is in good condition, operational and locked with chain and lock. Please note that access to the site is shared with FPL who owns/operates/maintains an electrical substation.</u>				
C. Institutional Controls (ICs)				
1.	Implementation and Enforcement			
	Site conditions imply ICs not properly implemented	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
	Site conditions imply ICs not being fully enforced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
	Type of monitoring (e.g., self-reporting, drive by): <u>Site visits</u>			
	Frequency: <u>2 to 3 per month</u>			
	Responsible party/agency: <u>PRP</u>			
	Contact <u>Luis A. Nieves</u>	<u>Director</u>	<u>03/03/2021</u>	<u>813-503-1619</u>
	Name	Title	Date	Phone no.
	Reporting is up to date	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
	Reports are verified by the lead agency	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
	Specific requirements in deed or decision documents have been met	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
	Violations have been reported	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
	Other problems or suggestions: <input type="checkbox"/> Report attached			
2.	Adequacy	<input checked="" type="checkbox"/> ICs are adequate	<input type="checkbox"/> ICs are inadequate	<input type="checkbox"/> N/A
Remarks: _____				
D. General				
1.	Vandalism/Trespassing	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> No vandalism evident	
Remarks: <u>Site visits performed 2 to 3 times per month</u>				
2.	Land Use Changes On Site	<input checked="" type="checkbox"/> N/A		
Remarks: <u>None</u>				
3.	Land Use Changes Off Site	<input checked="" type="checkbox"/> N/A		
Remarks: <u>None known</u>				
VI. GENERAL SITE CONDITIONS				
A. Roads	<input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A			
1.	Roads Damaged	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Roads adequate	<input type="checkbox"/> N/A
Remarks: <u>Paved site access roads and unpaved roads used to access the landfill and groundwater monitoring wells and treatment equipment area are in good condition and can support vehicular truck traffic. Due to the change in site grounds maintenance contractor, mowing of unpaved roads, landfill and drainage ditches is scheduled for 2q21.</u>				
B. Other Site Conditions				
Remarks: _____				

VII. LANDFILL COVERS			<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
A. Landfill Surface				
1.	Settlement (low spots)	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Settlement not evident	
	Area extent: _____		Depth: _____	
	Remarks: _____			
2.	Cracks	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Cracking not evident	
	Lengths: _____	Widths: _____	Depths: _____	
	Remarks: _____			
3.	Erosion	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Erosion not evident	
	Area extent: _____		Depth: _____	
	Remarks: _____			
4.	Holes	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Holes not evident	
	Area extent: _____		Depth: _____	
	Remarks: <u>Detailed landfill cover inspection on 3-3-21 revealed the existence of two apparent animal burrows (potentially gopher tortoises). An inspection by licensed/qualified/trained personnel will be performed in 2q21 to confirm nature of burrows followed by appropriate corrective measures (including animal relocation if appropriate in accordance with Florida Fish Wildlife Conservation Commission (FWC) regulations). Additional measures to prevent entry of animals to the landfill area will be evaluated and if appropriate implemented.</u>			
5.	Vegetative Cover	<input checked="" type="checkbox"/> Grass	<input checked="" type="checkbox"/> Cover properly established	
	<input type="checkbox"/> No signs of stress	<input type="checkbox"/> Trees/shrubs (indicate size and locations on a diagram)		
	Remarks: <u>There are no trees/shrubs on landfill cover. Most recent mowing of landfill, unpaved roads and perimeter drainage ditch was performed in 3q20. Due to the change in site grounds maintenance contractor, mowing of landfill cover, unpaved roads and perimeter drainage ditch is scheduled for 2q21.</u>			
6.	Alternative Cover (e.g., armored rock, concrete)		<input checked="" type="checkbox"/> N/A	
	Remarks: _____			
7.	Bulges	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Bulges not evident	
	Area extent: _____		Height: _____	
	Remarks: _____			
8.	Wet Areas/Water Damage	<input checked="" type="checkbox"/> Wet areas/water damage not evident		
	<input type="checkbox"/> Wet areas	<input type="checkbox"/> Location shown on site map	Area extent: _____	
	<input type="checkbox"/> Ponding	<input type="checkbox"/> Location shown on site map	Area extent: _____	
	<input type="checkbox"/> Seeps	<input type="checkbox"/> Location shown on site map	Area extent: _____	
	<input type="checkbox"/> Soft subgrade	<input type="checkbox"/> Location shown on site map	Area extent: _____	
	Remarks: _____			
9.	Slope Instability	<input type="checkbox"/> Slides	<input type="checkbox"/> Location shown on site map	
	<input checked="" type="checkbox"/> No evidence of slope instability			

Area extent: _____	
Remarks: _____	
B. Benches <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A	
(Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)	
1. Flows Bypass Bench <input type="checkbox"/> Location shown on site map <input type="checkbox"/> N/A or okay	Remarks: _____
2. Bench Breached <input type="checkbox"/> Location shown on site map <input type="checkbox"/> N/A or okay	Remarks: _____
3. Bench Overtopped <input type="checkbox"/> Location shown on site map <input type="checkbox"/> N/A or okay	Remarks: _____
C. Letdown Channels <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A	
(Channel lined with erosion control mats, riprap, grout bags or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)	
1. Settlement (Low spots) <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> No evidence of settlement	Area extent: _____ Depth: _____
Remarks: _____	
2. Material Degradation <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> No evidence of degradation	Material type: _____ Area extent: _____
Remarks: _____	
3. Erosion <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> No evidence of erosion	Area extent: _____ Depth: _____
Remarks: _____	
4. Undercutting <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> No evidence of undercutting	Area extent: _____ Depth: _____
Remarks: _____	
5. Obstructions Type: _____ <input checked="" type="checkbox"/> No obstructions	<input type="checkbox"/> Location shown on site map Area extent: _____
Size: _____	
Remarks: _____	
6. Excessive Vegetative Growth	Type: <u>There is evidence of excessive vegetation growth (grass) at the entry end of the letdown pipe (10 inch PVC) and the exit of the pipe at the toe of the landfill berm. The vegetation was cleared by hand to expose the pipe and perform an inspection; no visible signs of erosion or plugging was detected during the inspection on 3-3-21. Mowing of the landfill (including top and side berm where the letdown pipe is located) and the perimeter ditch is scheduled for 2q21</u>

<input type="checkbox"/> No evidence of excessive growth <input type="checkbox"/> Vegetation in channels does not obstruct flow <input type="checkbox"/> Location shown on site map Area extent: _____ Remarks: _____			
D. Cover Penetrations <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A			
1.	Gas Vents	<input type="checkbox"/> Active	<input type="checkbox"/> Passive
	<input type="checkbox"/> Properly secured/locked	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled <input type="checkbox"/> Good condition
	<input type="checkbox"/> Evidence of leakage at penetration	<input type="checkbox"/> Needs maintenance	<input checked="" type="checkbox"/> N/A
Remarks: _____			
2.	Gas Monitoring Probes	<input type="checkbox"/> Active	<input type="checkbox"/> Passive
	<input type="checkbox"/> Properly secured/locked	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled <input type="checkbox"/> Good condition
	<input type="checkbox"/> Evidence of leakage at penetration	<input type="checkbox"/> Needs maintenance	<input checked="" type="checkbox"/> N/A
Remarks: _____			
3.	Monitoring Wells (within surface area of landfill)		
	<input type="checkbox"/> Properly secured/locked	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled <input type="checkbox"/> Good condition
	<input type="checkbox"/> Evidence of leakage at penetration	<input type="checkbox"/> Needs maintenance	<input checked="" type="checkbox"/> N/A
Remarks: _____			
4.	Extraction Wells Leachate		
	<input checked="" type="checkbox"/> Properly secured/locked	<input checked="" type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition
	<input type="checkbox"/> Evidence of leakage at penetration	<input type="checkbox"/> Needs maintenance	<input type="checkbox"/> N/A
Remarks: <u>Leachate collection system and leachate detection system standpipes (4 total) are closed and secured with caps attached with stainless steel bolts. The concrete pad on which the standpipes are located is in good condition, structurally sound with no significant cracking. The leachate level was monitored in Sept 2018; approximate leachate depth above the HDPE liner was 0.5 feet with an estimated volume of 60,000 gallons. Monitoring of leachate level and sampling/analysis is scheduled for 2q21. No leachate has been removed during the review period 2016 to 2021.</u>			
5.	Settlement Monuments	<input type="checkbox"/> Located	<input type="checkbox"/> Routinely surveyed <input checked="" type="checkbox"/> N/A
Remarks: _____			
E. Gas Collection and Treatment <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A			
1.	Gas Treatment Facilities		
	<input type="checkbox"/> Flaring	<input type="checkbox"/> Thermal destruction	<input type="checkbox"/> Collection for reuse
	<input type="checkbox"/> Good condition	<input type="checkbox"/> Needs maintenance	
Remarks: _____			
2.	Gas Collection Wells, Manifolds and Piping		
	<input type="checkbox"/> Good condition	<input type="checkbox"/> Needs maintenance	
Remarks: _____			
3.	Gas Monitoring Facilities (e.g., gas monitoring of adjacent homes or buildings)		
	<input type="checkbox"/> Good condition	<input type="checkbox"/> Needs maintenance	<input checked="" type="checkbox"/> N/A

Remarks: _____			
F. Cover Drainage Layer		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	Outlet Pipes Inspected	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A
Remarks: _____			
2.	Outlet Rock Inspected	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A
Remarks: _____			
G. Detention/Sedimentation Ponds		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	Siltation	Area extent: _____	Depth: _____ <input type="checkbox"/> N/A
<input type="checkbox"/> Siltation not evident			
Remarks: _____			
2.	Erosion	Area extent: _____	Depth: _____
<input type="checkbox"/> Erosion not evident			
Remarks: _____			
3.	Outlet Works	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A
Remarks: _____			
4.	Dam	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A
Remarks: _____			
H. Retaining Walls		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	Deformations	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Deformation not evident
Horizontal displacement: _____		Vertical displacement: _____	
Rotational displacement: _____			
Remarks: _____			
2.	Degradation	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Degradation not evident
Remarks: _____			
I. Perimeter Ditches/Off-Site Discharge		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
1.	Siltation	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Siltation not evident
Area extent: _____		Depth: _____	
Remarks: _____			
2.	Vegetative Growth	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> N/A
<input type="checkbox"/> Vegetation does not impede flow			
Area extent: _____		Type: _____	
Remarks: <u>Although there is no indication of significant flow impediment, there is excessive vegetation present in the perimeter drainage ditch around the landfill. Due to the change in the site grounds maintenance contractor, mowing of the perimeter drainage ditch is scheduled for 2q21.</u>			
3.	Erosion	<input type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Erosion not evident
Area extent: _____		Depth: _____	
Remarks: _____			

4.	Discharge Structure	<input checked="" type="checkbox"/> Functioning	<input type="checkbox"/> N/A
Remarks: _____			
VIII. VERTICAL BARRIER WALLS		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	Settlement	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Settlement not evident
Area extent: _____		Depth: _____	
Remarks: _____			
2.	Performance Monitoring	Type of monitoring: _____	
<input type="checkbox"/> Performance not monitored			
Frequency: _____		<input type="checkbox"/> Evidence of breaching	
Head differential: _____			
Remarks: _____			
IX. GROUNDWATER/SURFACE WATER REMEDIES		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
A. Groundwater Extraction Wells, Pumps and Pipelines		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
1.	Pumps, Wellhead Plumbing and Electrical		
<input type="checkbox"/> Good condition <input type="checkbox"/> All required wells properly operating <input type="checkbox"/> Needs maintenance <input type="checkbox"/> N/A			
Remarks: <u>There have been no changes to existing historical infrastructure installed in the mid 1990s when groundwater treatment operations were commenced. Due to a wild fire event in 2008, which destroyed cabling/pumps/sprinkler systems, the system has not been operated since that time. Groundwater monitoring operations have continued uninterrupted.</u>			
2.	Extraction System Pipelines, Valves, Valve Boxes and Other Appurtenances		
<input type="checkbox"/> Good condition <input type="checkbox"/> Needs maintenance			
Remarks: <u>There have been no changes to existing historical infrastructure installed in the mid 1990s when groundwater treatment operations were commenced. Due to a wild fire event in 2008, which destroyed cabling/pumps/sprinkler systems, the system has not been operated since that time. Groundwater monitoring operations have continued uninterrupted.</u>			
3.	Spare Parts and Equipment		
<input type="checkbox"/> Readily available <input type="checkbox"/> Good condition <input type="checkbox"/> Requires upgrade <input type="checkbox"/> Needs to be provided			
Remarks: <u>There have been no changes to existing historical infrastructure installed in the mid 1990s when groundwater treatment operations were commenced. Due to a wild fire event in 2008, which destroyed cabling/pumps/sprinkler systems, the system has not been operated since that time. Groundwater monitoring operations have continued uninterrupted.</u>			
B. Surface Water Collection Structures, Pumps and Pipelines		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	Collection Structures, Pumps and Electrical		
<input type="checkbox"/> Good condition <input type="checkbox"/> Needs maintenance			
Remarks: _____			
2.	Surface Water Collection System Pipelines, Valves, Valve Boxes and Other Appurtenances		
<input type="checkbox"/> Good condition <input type="checkbox"/> Needs maintenance			
Remarks: _____			
3.	Spare Parts and Equipment		

<input type="checkbox"/> Readily available <input type="checkbox"/> Good condition <input type="checkbox"/> Requires upgrade <input type="checkbox"/> Needs to be provided Remarks: _____
C. Treatment System <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A
1. Treatment Train (check components that apply) <input type="checkbox"/> Metals removal <input type="checkbox"/> Oil/water separation <input type="checkbox"/> Bioremediation <input type="checkbox"/> Air stripping <input type="checkbox"/> Carbon adsorbers <input type="checkbox"/> Filters: _____ <input type="checkbox"/> Additive (e.g., chelation agent, flocculent): _____ <input type="checkbox"/> Others: _____ <input type="checkbox"/> Good condition <input type="checkbox"/> Needs maintenance <input type="checkbox"/> Sampling ports properly marked and functional <input type="checkbox"/> Sampling/maintenance log displayed and up to date <input type="checkbox"/> Equipment properly identified <input type="checkbox"/> Quantity of groundwater treated annually: _____ <input type="checkbox"/> Quantity of surface water treated annually: _____ Remarks: <u>There have been no changes to existing historical infrastructure installed in the mid 1990s when groundwater treatment operations were commenced. Due to a wild fire event in 2008, which destroyed cabling/pumps/sprinkler systems, the system has not been operated since that time. Groundwater monitoring operations have continued uninterrupted.</u>
2. Electrical Enclosures and Panels (properly rated and functional) <input type="checkbox"/> N/A <input type="checkbox"/> Good condition <input type="checkbox"/> Needs maintenance Remarks: <u>There have been no changes to existing historical infrastructure installed in the mid 1990s when groundwater treatment operations were commenced. Due to a wild fire event in 2008, which destroyed cabling/pumps/sprinkler systems, the system has not been operated since that time. Groundwater monitoring operations have continued uninterrupted.</u>
3. Tanks, Vaults, Storage Vessels <input type="checkbox"/> N/A <input type="checkbox"/> Good condition <input type="checkbox"/> Proper secondary containment <input type="checkbox"/> Needs maintenance Remarks: <u>There have been no changes to existing historical infrastructure installed in the mid 1990s when groundwater treatment operations were commenced. Due to a wild fire event in 2008, which destroyed cabling/pumps/sprinkler systems, the system has not been operated since that time. Groundwater monitoring operations have continued uninterrupted.</u>
4. Discharge Structure and Appurtenances <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Good condition <input type="checkbox"/> Needs maintenance Remarks: _____
5. Treatment Building(s) <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Good condition (esp. roof and doorways) <input type="checkbox"/> Needs repair <input type="checkbox"/> Chemicals and equipment properly stored Remarks: _____
6. Monitoring Wells (pump and treatment remedy) <input type="checkbox"/> Properly secured/locked <input type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition

<input type="checkbox"/> All required wells located <input checked="" type="checkbox"/> Needs maintenance <input type="checkbox"/> N/A Remarks: <u>In 2q21 as part of the annual groundwater monitoring event, locks on all wells will be replaced with new locks; as needed wells will be relabeled with ID numbers and in some cases locking caps installed and vegetation growth around the wells removed/treated to ensure well can be visually located.</u>
D. Monitoring Data
1. Monitoring Data <input checked="" type="checkbox"/> Is routinely submitted on time <input checked="" type="checkbox"/> Is of acceptable quality
2. Monitoring Data Suggests: <input checked="" type="checkbox"/> Groundwater plume is effectively contained <input checked="" type="checkbox"/> Contaminant concentrations are declining
E. Monitored Natural Attenuation
1. Monitoring Wells (natural attenuation remedy) <input type="checkbox"/> Properly secured/locked <input type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled <input type="checkbox"/> Good condition <input type="checkbox"/> All required wells located <input type="checkbox"/> Needs maintenance <input type="checkbox"/> N/A Remarks: <u>In 2q21 as part of the annual groundwater monitoring event, locks on all wells will be replaced with new locks; as needed wells will be relabeled with ID numbers and in some cases locking caps installed and vegetation growth around the wells removed/treated to ensure well can be visually located.</u>
X. OTHER REMEDIES
If there are remedies applied at the site and not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.
XI. OVERALL OBSERVATIONS
A. Implementation of the Remedy
Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is designed to accomplish (e.g., to contain contaminant plume, minimize infiltration and gas emissions). _____
B. Adequacy of O&M
Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy. _____
C. Early Indicators of Potential Remedy Problems
Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs that suggest that the protectiveness of the remedy may be compromised in the future. _____
D. Opportunities for Optimization
Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy. _____

APPENDIX H – SITE PHOTOS



Drone photo looking south toward the Southwest Wetland; southern portion of landfill is on right in photo; water storage tank and groundwater treatment facility are on left in photo



Drone photo looking west across landfill toward stormwater pond



Landfill letdown pipe located at toe of landfill berm



Animal burrow on southeast side of the landfill

APPENDIX I – DATA REVIEW SUPPORTING DOCUMENTATION

Table I-1: Groundwater Results through 2019 – Tier 1 Contaminants

Well	Sodium Concentration (mg/L)																								
	Jul 1995	Nov 1997/ Dec 1997	Dec 1998/ Jan 1999	Mar 2000/ May 2000	Jun 2002	Nov 2003	Aug 2005	Nov 2006	Jan 2008	Dec 2008	Dec 2009	Jun 2010	Dec 2010	Jun 2011	Oct 2011	Feb 2012	Dec 2012	Jul 2013	Feb-Mar 2014	Jul 2014	Mar 2015	Sep 2015	Mar 2016	Sep 2016	
• Shallow Surficial Aquifer Wells																									
M-19	434	558	450	181	377	322	443	410	270	320	360	40	88	420	180	230	100	NS	50	49	72	55	32	35	
M-25	391	503	390	207	326	321	320	300	270	260	85	91	91	78	73	80	73	NS	67	70	68	69	70	69	
M-50	563	309	379	189	249	47	171	160	110	120	--	82	78	64	63	63 (65*)	59 (65*)	57*	51	52 (53*)	50	50 (51*)	47 (49*)	47 (48*)	
M-52	210	262	184	30	13	13	14	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
M-65	24	26	24	28	63	34	27	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
M-67	10	9	14	14	14	12	--	--	--	--	--	21	18	16	16	16	17	19	22	20	19	18	32	26	
M-68	6	8	6	6	6	5	4	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
M-71	150	--	--	--	--	--	--	--	--	--	--	--	--	67	49	98	47	35	59	41	76	35	31	28	
M-90	24	21	23	13	10	12	10	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
M-96	155	49	32	24	28	26	17	--	--	--	--	--	--	--	6.7	6.9	NS	5.7	18	7.8	15	9.0	6.9		
M-104	--	--	--	--	--	--	--	--	--	--	--	110	130	220	220	250	270	250	220	210	190	220	240	210	
M-105	--	--	--	--	--	--	--	--	--	--	--	--	--	--	50 (55*)	70 (86*)	60 (61*)	57*	64*	54 (20*)	57*	43 (45*)	42 (44*)	43 (44*)	
M-107	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	67 (77*)	31	140*	97	110	140	83	89	59	
M-109	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	84**	80	73	74	85	
M-110	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	330**	350	320	300	340
M-111	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	170**	160	170	190	190
M-112	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	290**	240	280	240	280	280	280	260	260	
M-113	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	11**	15	14	15	13	
• Confining Layer 2 Monitor Wells																									
M-114	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	140 (88*)†	72	63 (70*)	70 (78*)	63 (67*)
M-115	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	150†	150	150	120 (130*)	120
• Deep Surficial Aquifer Wells																									
M-22	860	837	676	318	39	518	753	390	110	67	210	200	200	170	180	170	170	170*	160	160	160	NS	NS	150	
M-40	14	19	20	19	26	26	18	--	--	--	--	--	29	19	17	18	19	18*	17	17	19	19	19	19	
M-73	1510	1340	1123	577	628	498	364	370	460	180	480	480	550	720	740	710	730	670	380	340	490	500	370	470	
M-74	11	13	--	13	--	11	12	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
M-76	15	100	150	151	98	333	349	120	190	92	--	--	--	--	170	210	NS	260	310	330	340	320	370		
M-80	1170	1170	779	127	196	30	74	--	--	--	--	--	--	--	21	25	25	61	14	28	30	32	33		
M-81	109	442	579	361	455	287	250	240	96	46	--	--	--	--	100	85	71	23	75	61	60	55	85		
M-86	90	74	59	49	67	126	159	150	190	130	--	--	--	--	150	160	160*	130	5.2	140	120 (120*)	110	110		
M-87	12	14	14	11	12	11	11	--	--	--	--	--	--	--	13	13	13	13	12	12	13	13	13		
M-91	17	18	22	15	17	17	15	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
M-94	13	46	74	66	20	47	88	34	180	180	240	260	250	240	230	250	280	NS	260	270	270	250	230	250	
M-95	301	797	588	338	633	513	895	770	350	210	330	390	400	340	310	300	280	NS	220	220	210	200	180	200	
M-101	--	--	--	--	--	--	--	--	--	--	--	170	170	150	140	130	140	120*	41	34**	110	110	110	110	
M-102	--	--	--	--	--	--	--	--	--	--	--	76	92	120	110	110	170	190*	190	190	190	220	230	250	
M-103	--	--	--	--	--	--	--	--	--	--	--	220	260	250	290	220	270	170	250	240	260	240	230	220	
M-106	--	--	--	--	--	--	--	--	--	--	--	--	--	--	60	54	64	NS	61	34	61	71	79	76	
M-108	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	140	29*	9.5	35**	35	25	36	39	

Note: Concentrations that exceed the extraction and discharge standard of 160 mg/L are shaded and bolded.

* Dissolved concentration.

** Samples collected on September 5, 2014.

† Sampled in September 2014.

NS – Not Sampled

Well	Radium 226+Radium 228 Concentrations (pCi/L)																	
	Jul 1995	Nov 1997/ Dec 1997	Dec 1998/ Jan 1999	Jun 2002	Nov 2003	Aug 2005	Nov 2006	Jan 2008	Dec 2008	Dec 2009	Jun 2010	Dec 2010	Jun 2011	Oct 2011	Feb 2012	Dec 2012	Jul 2013	Feb-Mar 2014
● Shallow Surficial Aquifer Wells																		
M-19	–	1.4 ± 0.6	<1.1 ± 0.6	4.2 ± 1.3	<1.53 ± 0.96	1.79 ± 0.51	3.9 ± 1.1	1.6 ± 1.1	4.1 ± 1.2	3.6 ± 1.1	2.2 ± 1.1	1.1 ± 0.9	5.0 ± 1.3	2.3 ± 1.1	1.4 ± 0.9	1.3 ± 1.1	NS	3.0 ± 1.2
M-25	40.1 ± 0.9	43.1 ± 0.6	<27 ± 0.6	33.8 ± 7.1	23.4 ± 3.0	18.2 ± 2.0	23.6 ± 3.1	25.6 ± 3.1	24.3 ± 2.2	17.2 ± 2.1	14.3 ± 2.1	15.5 ± 2.1	20 ± 2.1	25.9 ± 2.2	12.6 ± 1.8	22 ± 3.2	NS	13.6 ± 2.0
M-50	–	8.5 ± 0.7	<3.0 ± 0.7	6.9 ± 2.0	1.92 ± 0.81	2.61 ± 0.56	1.3 ± 0.9	9.2 ± 1.7	8.8 ± 1.1	–	11.0 ± 1.5	12.0 ± 1.8	11.5 ± 1.8	11.5 ± 1.7	12.2 ± 1.8	9.8 ± 1.8	6.1 ± 1.3*	5.0 ± 1.2
M-52	9.7 ± 0.6	7.0 ± 0.7	<6.0 ± 0.7	1.5 ± 0.7	<1.25 ± 0.82	<0.20 ± 0.31	–	–	–	–	–	–	–	–	–	–	–	–
M-65	1.5 ± 0.8	0.9 ± 0.7	<1.2 ± 0.8	1.5 ± 0.9	1.59 ± 0.71	<0.67 ± 0.38	–	–	–	–	–	–	–	–	–	–	–	–
M-67	<0.7 ± 0.6	<4.0 ± 0.7	<0.8 ± 0.6	1.5 ± 0.7	<0.92 ± 0.59	–	–	–	–	–	1.8 ± 1.1	1.6 ± 0.9	1.1 ± 0.9	1.0 ± 0.9	1.4 ± 0.9	1.8 ± 1.3	1.6 ± 1.0	1.7 ± 1.1
M-68	<0.6 ± 0.6	<0.6 ± 0.6	<0.6 ± 0.6	1.0 ± 0.6	<1.11 ± 0.92	<0.34 ± 0.30	–	–	–	–	–	–	–	–	–	–	–	–
M-71	<1.3 ± 0.5	–	–	–	–	–	–	–	–	–	–	–	2.0 ± 1.0	2.6 ± 1.1	2.6 ± 1.1	0.8 ± 1.3	1.3 ± 0.9	2.2 ± 1.2
M-90	0.8 ± 0.8	0.9 ± 0.6	<0.6 ± 0.6	1.8 ± 1.0	2.37 ± 0.75	<0.54 ± 0.31	–	–	–	–	–	–	–	–	–	–	–	–
M-96	<4.0 ± 0.6	1.6 ± 0.6	<0.8 ± 0.6	1.0 ± 0.9	<0.71 ± 0.73	<0.31 ± 0.45	–	–	–	–	–	–	–	–	0.9 ± 1.0	0.8 ± 1.3	NS	2.2 ± 1.2
M-104	–	–	–	–	–	–	–	–	–	–	7.0 ± 1.4	7.2 ± 1.6	14.9 ± 2.1	13.5 ± 1.8	14.1 ± 1.9	14.1 ± 1.9	12.0 ± 1.7	10.4 ± 2.2
M-105	–	–	–	–	–	–	–	–	–	–	–	–	–	13.4 ± 1.8	6.0 ± 1.4	3.5 ± 1.1	1.8 ± 0.9*	1.5 ± 1.1*
M-107	–	–	–	–	–	–	–	–	–	–	–	–	–	–	4.9 ± 1.3	1.2 ± 0.9	1.8 ± 1.0*	2.6 ± 1.1
M-109	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
M-110	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
M-111	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
M-112	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
M-113	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
● Confining Layer 2 Monitor Wells																		
M-114	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
M-115	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
● Deep Surficial Aquifer Wells																		
M-22	59.7 ± 1.0	56.6 ± 1.0	<53.8 ± 1.3	13.8 ± 3.3	68.1 ± 6.4	27 ± 2.7	4.8 ± 1.4	12.1 ± 2.2	8.3 ± 2.1	13.3 ± 1.8	9.2 ± 1.7	10.9 ± 1.7	9.4 ± 1.6	11.1 ± 1.8	7.3 ± 1.6	7.0 ± 1.6	12.9 ± 1.9*	8.4 ± 2.0
M-40	–	1.4 ± 0.6	<0.8 ± 0.6	1.3 ± 0.8	<1.53 ± 0.88	<0.83 ± 0.49	–	–	–	–	–	2.2 ± 0.9	2.1 ± 1.7	1.3 ± 1.0	1.8 ± 1.0	1.2 ± 1.2	1.2 ± 0.8*	3.2 ± 1.1
M-73	64.4 ± 1.1	42.8 ± 0.9	<61 ± 1.3	14.2 ± 3.3	<11.6 ± 1.7	<3.42 ± 0.66	4.2 ± 1.2	16.5 ± 2.1	6.5 ± 1.6	9.5 ± 1.7	12.3 ± 1.9	11.1 ± 1.7	16.6 ± 2.1	16.6 ± 1.9	15.4 ± 2.1	16.3 ± 2.1	12.6 ± 1.9	7.4 ± 1.6
M-74	–	<0.6 ± 0.6	–	–	<0.51 ± 0.55	<0.08 ± 0.45	–	–	–	–	–	–	–	–	–	–	–	–
M-76	–	3.6 ± 0.6	<2.5 ± 0.7	3.0 ± 1.0	4.70 ± 1.05	3.03 ± 0.64	1.0 ± 1.1	5.8 ± 1.6	3.3 ± 1.3	–	–	–	–	–	2.4 ± 1.0	3.4 ± 1.1	NS	4.0 ± 1.2
M-80	–	4.7 ± 0.7	<3.4 ± 0.7	1.8 ± 0.8	<0.79 ± 0.64	<0.84 ± 0.52	–	–	–	–	–	–	–	–	0.5 ± 0.9	0.9 ± 0.9	1.7 ± 0.9	3.7 ± 1.2
M-81	–	5.4 ± 0.7	<4.9 ± 0.7	5.2 ± 1.5	<3.27 ± 0.90	2.53 ± 0.54	2.2 ± 1.1	1.5 ± 0.9	1.7 ± 0.9	–	–	–	–	–	1.2 ± 0.9	–	2.3 ± 1.1	3.1 ± 1.1
M-86	<4.0 ± 0.7	1.7 ± 0.6	<2.3 ± 0.7	1.8 ± 0.8	4.80 ± 1.04	4.71 ± 0.63	4.7 ± 1.6	5.8 ± 1.6	4.9 ± 1.4	–	–	–	–	–	4.8 ± 1.4	0.8 ± 1.3	3.8 ± 1.1*	4.2 ± 1.3
M-87	–	<1.3 ± 0.6	<0.8 ± 0.6	1.8 ± 1.0	<1.01 ± 0.56	<0.49 ± 0.42	–	–	–	–	–	–	–	–	1.0 ± 0.9	1.9 ± 1.5	0.6 ± 0.8	2.5 ± 1.1
M-91	–	2.9 ± 0.6	<1.5 ± 0.6	3.7 ± 1.4	3.21 ± 0.88	<2.25 ± 0.54	–	–	–	–	–	–	–	–	–	–	–	–
M-94	–	1.6 ± 0.6	<2.6 ± 0.7	2.8 ± 4.0	3.88 ± 1.06	<2.16 ± 0.50	0.1 ± 0.9	2.5 ± 1.1	5.7 ± 1.3	9.1 ± 1.5	10.8 ± 1.7	11.3 ± 1.7	7.2 ± 1.5	7.7 ± 1.5	7.9 ± 1.6	10.1 ± 1.9	NS	7.7 ± 1.5
M-95	<4.0 ± 0.6	7.0 ± 0.6	<4.8 ± 0.7	4.2 ± 1.2	4.34 ± 0.96	3.42 ± 0.62	4.3 ± 1.4	3.7 ± 1.3	4.2 ± 1.1	3.9 ± 1.2	3.1 ± 1.1	1.8 ± 1.1	1.6 ± 0.9	2.3 ± 1.1	2.4 ± 1.1	1.2 ± 1.1	NS	2.3 ± 1.0
M-101	–	–	–	–	–	–	–	–	–	–	3.9 ± 1.1	3.4 ± 1.1	1.5 ± 0.9	2.0 ± 0.9	1.7 ± 1.0	0.7 ± 0.9	3.0 ± 1.0*	4.1 ± 1.3
M-102	–	–	–	–	–	–	–	–	–	–	3.9 ± 1.1	3.3 ± 1.1	1.9 ± 0.9	2.5 ± 1.0	2.1 ± 1.0	1.8 ± 0.9	2.5 ± 1.1*	3.9 ± 1.2
M-103	–	–	–	–	–	–	–	–	–	–	3.6 ± 1.1	4.6 ± 1.2	3.5 ± 1.1	3.3 ± 1.1	2.4 ± 1.1	2.4 ± 1.2	3.5 ± 1.2	2.9 ± 1.1
M-106	–	–	–	–	–	–	–	–	–	–	–	–	–	1.7 ± 0.9	1.4 ± 1.1	1.1 ± 1.0	NS	1.6 ± 1.0
M-108	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1.5 ± 1.0	0.9 ± 0.9*	0.6 ± 0.8	–

Note: Mean concentrations that exceed the extraction and discharge standard of 5 pCi/L are shaded and bolded.

* Dissolved concentration.

** Samples collected on September 5, 2014.

NS – Not Sampled

Well	Radium 226+Radium 228 Concentrations (pCi/L)																	
	Jul 2014	Mar 2015	Sep 2015	Mar 2016	Sep 2016	Apr 2017	Dec 2017	Apr 2018	Nov-Dec 2018	Jun 2019								
• Shallow Surficial Aquifer Wells																		
M-19	0.8 ± 1.0	1.1 ± 0.6	1.4 ± 0.7	1.0 ± 0.5	1.0 ± 0.6	2.8 ± 0.4	0.8 ± 0.3	1.3 ± 0.3	0.5 ± 0.4	1.3 ± 0.3								
M-25	25 ± 2.6	20.1 ± 1.5	20.0 ± 1.8	22.3 ± 1.4	13.4 ± 1.1	0.7 ± 0.3	1.2 ± 0.3	1.8 ± 0.3	1.1 ± 0.4	0.2 ± 0.3								
M-50	11.2 ± 1.7	8.4 ± 1.1	13.0 ± 1.0	12.5 ± 1.3	14.5 ± 2.7	3.6 ± 0.8	NS	2.4 ± 0.6	1.4 ± 0.6	1.8 ± 0.6								
M-50F	--	--	--	--	--	3.1 ± 0.8	NS	--	0.8 ± 0.4	0.4 ± 1.1								
M-52	--	--	--	--	--	--	--	--	--	--								
M-65	--	--	--	--	--	--	--	--	--	--								
M-67	2.0 ± 1.1	2.0 ± 0.6	1.7 ± 0.5	1.5 ± 0.6	1.1 ± 0.5	0.7 ± 0.3	1.2 ± 0.3	1.3 ± 0.3	0.9 ± 0.3	1.4 ± 0.4								
M-68	--	--	--	--	--	--	--	--	--	--								
M-71	0.9 ± 1.0	3.0 ± 0.7	1.5 ± 0.7	1.4 ± 0.7	1.6 ± 0.6	0.9 ± 0.4	0.4 ± 0.4	1.4 ± 0.4	0.9 ± 0.4	0.9 ± 0.5								
M-71F	--	--	--	--	--	1.1 ± 0.4	--	--	--	1.7 ± 0.6								
M-90	--	--	--	--	--	--	--	--	--	--								
M-96	2.5 ± 1.1	1.1 ± 0.7	3.3 ± 0.8	1.6 ± 0.6	1.0 ± 0.6	0.3 ± 0.2	0.9 ± 0.2	0.3 ± 0.3	0.6 ± 0.3	0.3 ± 0.3								
M-104	10.8 ± 1.6	13.5 ± 1.2	15.0 ± 1.1	3.7 ± 0.8	13.2 ± 1.1	8.6 ± 0.6	5.1 ± 0.4	8.2 ± 0.6	5.7 ± 0.5	1.5 ± 0.4								
M-105	2.6 ± 1.2	4.0 ± 0.8	3.7 ± 0.7	3.6 ± 0.8	1.1 ± 0.5	1.1 ± 0.4	--	1.3 ± 0.5	1.1 ± 0.5	0.8 ± 0.7								
M-105F	--	--	--	--	--	0.6 ± 0.2	1.3 ± 0.4	--	0.2 ± 0.3	0.4 ± 0.4								
M-107	2.7 ± 1.2	1.6 ± 0.7	1.8 ± 0.6	1.5 ± 0.6	1.2 ± 0.6	0.6 ± 0.3	0.8 ± 0.3	0.8 ± 0.3	0.8 ± 0.3	0.6 ± 0.3								
M-109	3.3 ± 1.4	3.5 ± 0.7	2.8 ± 0.7	2.7 ± 0.6	3.9 ± 0.7	1.5 ± 0.3	1.6 ± 0.3	1.1 ± 0.3	1.1 ± 0.3	0.9 ± 0.4								
M-110	33 ± 2**	31.6 ± 1.7	31.5 ± 1.3	37 ± 1.9	35.6 ± 1.7	23.1 ± 0.9	2.0 ± 0.3	23.1 ± 0.8	24.4 ± 1.0	26.8 ± 1.0								
M-111	8.2 ± 2.6**	2.8 ± 0.9	2.1 ± 0.7	2.9 ± 0.6	2.6 ± 0.6	2.6 ± 0.3	2.3 ± 0.4	2.1 ± 0.3	2.3 ± 0.4	2.6 ± 0.4								
M-112	15.9 ± 1.3**	10.1 ± 1.1	8.3 ± 0.8	9.0 ± 1.0	2.6 ± 0.9	4.5 ± 0.4	3.4 ± 0.4	4.9 ± 0.4	3.5 ± 0.5	4.5 ± 0.5								
M-113	0.9 ± 0.7**	1.8 ± 0.8	1.7 ± 0.5	1.5 ± 0.6	1.4 ± 0.6	0.5 ± 0.3	1.1 ± 0.2	0.7 ± 0.3	0.3 ± 0.3	-0.5 ± 0.2								
• Confining Layer 2 Monitor Wells																		
M-114	16.7 ± 2.0†	14.0 ± 1.1	13.8 ± 0.9	12.9 ± 1.1	8.7 ± 0.9	19.8 ± 2.0	11.9 ± 1.2	20.2 ± 1.7	4.7 ± 0.8	5.9 ± 1.2								
M-114F	--	--	--	--	--	0.6 ± 0.3	--	0.9 ± 0.2	1.5 ± 0.4	0.6 ± 0.7								
M-115	14.8 ± 1.9†	16.6 ± 1.3	19.9 ± 1.1	25.4 ± 1.5	12.9 ± 1.2	38.6 ± 2.6	27.1 ± 0.9	9.4 ± 0.5	12.3 ± 0.8	17.5 ± 1.0								
M-115F	--	--	--	--	--	9.1 ± 0.6	--	--	11.1 ± 0.7	--								
• Deep Surficial Aquifer Wells																		
M-22	9.7 ± 1.7	6.2 ± 0.8	NS	NS	7.1 ± 0.8	4.3 ± 0.5	NS	5.6 ± 0.4	5.5 ± 0.5	3.5 ± 0.4								
M-40	0.9 ± 0.9	1.6 ± 0.4	1.4 ± 0.6	1.2 ± 0.6	1.3 ± 0.6	0.7 ± 0.3	0.8 ± 0.3	0.6 ± 0.2	0.9 ± 0.3	0.4 ± 0.3								
M-73	8.2 ± 1.5	11.5 ± 0.9	10.8 ± 0.9	10.2 ± 1.1	9.6 ± 1.0	6.0 ± 0.5	5.7 ± 0.4	5.0 ± 0.4	7.2 ± 0.6	5.1 ± 0.7								
M-74	--	--	--	--	--	--	--	--	--	--								
M-76	3.9 ± 1.2	4.1 ± 0.6	4.1 ± 0.8	4.9 ± 0.8	4.5 ± 0.9	2.2 ± 0.3	3.0 ± 0.3	2.6 ± 0.3	2.3 ± 0.3	2.2 ± 0.4								
M-80	1.9 ± 1.1	1.9 ± 0.6	1.8 ± 0.7	2.0 ± 0.6	1.3 ± 0.6	0.7 ± 0.3	1.2 ± 0.3	0.8 ± 0.2	0.9 ± 0.3	0.7 ± 0.3								
M-81	2.3 ± 1.1	2.3 ± 0.6	2.1 ± 0.7	1.4 ± 0.6	1.6 ± 0.6	0.8 ± 0.3	1.3 ± 0.3	0.9 ± 0.2	0.9 ± 0.3	0.4 ± 0.3								
M-86	2.1 ± 1.1	3.9 ± 0.8	4.6 ± 0.8	4.4 ± 0.8	3.7 ± 0.8	2.0 ± 0.4	--	2.0 ± 0.3	2.6 ± 0.5	1.5 ± 0.5								
M-86F	--	--	--	--	--	1.6 ± 0.3	2.0 ± 0.3	--	1.5 ± 0.4	0.8 ± 0.4								
M-87	2.8 ± 1.2	1.7 ± 0.5	0.9 ± 0.6	1.3 ± 0.6	0.8 ± 0.6	0.6 ± 0.3	0.6 ± 0.2	0.5 ± 0.2	0.6 ± 0.3	0.3 ± 0.3								
M-91	--	--	--	--	--	--	--	--	--	--								
M-94	8.0 ± 1.5	8.0 ± 1.0	7.2 ± 1.0	9.3 ± 0.9	7.4 ± 1.0	4.8 ± 0.5	5.0 ± 0.4	5.1 ± 0.4	4.7 ± 0.5	4.2 ± 0.6								
M-95	3.9 ± 1.3	1.3 ± 0.6	1.2 ± 0.6	1.8 ± 0.6	1.6 ± 0.6	0.8 ± 0.3	1.5 ± 0.3	0.8 ± 0.2	1.0 ± 0.4	0.5 ± 0.3								
M-101	0.0 ± 1.1**	1.8 ± 0.7	2.7 ± 0.6	2.0 ± 0.7	1.7 ± 0.6	0.5 ± 0.2	1.2 ± 0.3	0.8 ± 0.2	1.3 ± 0.3	0.7 ± 0.3								
M-102	2.7 ± 1.1	2.5 ± 0.7	4.1 ± 0.7	3.4 ± 0.7	2.6 ± 0.7	1.8 ± 0.3	2.0 ± 0.3	1.4 ± 0.3	1.1 ± 0.3	8.0 ± 0.6								
M-103	4.3 ± 1.3	3.5 ± 0.8	3.1 ± 0.6	2.2 ± 0.6	2.5 ± 0.7	1.8 ± 0.3	2.0 ± 0.3	1.4 ± 0.3	1.8 ± 0.3	1.6 ± 0.4								
M-106	2.3 ± 1.0	1.5 ± 0.6	2.3 ± 0.6	3.4 ± 0.7	1.8 ± 0.6	1.3 ± 0.3	1.2 ± 0.3	0.7 ± 0.2	1.0 ± 0.3	7.6 ± 0.6								
M-108	2.4 ± 1.5**	0.7 ± 0.7	0.7 ± 0.7	1.4 ± 0.5	0.8 ± 0.5	0.8 ± 0.3	0.8 ± 0.3	0.5 ± 0.2	0.4 ± 0.3	0.8 ± 0.3								

Note: Mean concentrations that exceed the extraction and discharge standard of 5 pCi/L are shaded and bolded. * Dissolved concentration. F suffix indicates field-filtered sample.

** Samples collected on September 5, 2014. † Sampled in September 2014. NS – Not Sampled

Well	Gross Alpha Concentration (pCi/L)																	
	Jul 1995	Nov 1997/ Dec 1997	Dec 1998/ Jan 1999	Jun 2002	Nov 2003	Aug 2005	Nov 2006	Jan 2008	Dec 2008	Dec 2009	Jun 2010	Dec 2010	Jun 2011	Oct 2011	Feb 2012	Dec 2012	Jul 2013	Feb-Mar 2014
Shallow Surficial Aquifer Wells																		
M-19	4 ± 14	3 ± 10	30 ± 35	1.9 ± 3.3	<-0.9 ± 8.6	26 ± 14	0.0 ± 6.0	8.7 ± 2.4	7.1 ± 4.8	2.9 ± 0.7	1.1 ± 0.8	2.3 ± 1.4	2.4 ± 1.1	2.3 ± 1.1	1.9 ± 2.3	1.5 ± 1.4	NS	2.4 ± 1.0
M-25	62 ± 22	63 ± 19	89 ± 49	28.4 ± 8.3	56 ± 12	39.3 ± 9.9	48 ± 7	58 ± 5	38 ± 5	27.0 ± 3.0	19.0 ± 2.0	27 ± 3	31 ± 3	26 ± 2	18.3 ± 2.0	39 ± 3	NS	29 ± 2
M-50	1 ± 13	27 ± 15	32 ± 10	6.6 ± 2.9	14.6 ± 3.2	41 ± 10	13.1 ± 2.4	13.9 ± 2.0	14.2 ± 2.2	-	31.0 ± 3.0	12.8 ± 1.8	26 ± 3	22 ± 2	22 ± 2	22 ± 2	33 ± 3	43 ± 2*
M-52	4 ± 7	7 ± 9	14 ± 5	4.1 ± 1.4	2.6 ± 1.5	3.6 ± 1.8	-	-	-	-	-	-	-	-	-	-	-	-
M-65	<1 ± 3	<1 ± 2	3 ± 2	3.5 ± 1.5	<1.4 ± 1.1	2.1 ± 1.3	-	-	-	-	-	-	-	-	-	-	-	-
M-67	2 ± 3	2 ± 2	2 ± 2	0.8 ± 0.5	1.37 ± 0.82	-	-	-	-	-	2.0 ± 1.3	2.0 ± 1.3	0.7 ± 1.6	0.0 ± 0.9	2.1 ± 1.0	2.4 ± 1.2	1.3 ± 0.9	1.4 ± 1.3
M-68	<1 ± 3	3 ± 3	2 ± 2	0.5 ± 0.4	2.40 ± 0.90	2.73 ± 0.86	-	-	-	-	-	-	-	-	-	-	-	-
M-71	<1 ± 6	-	-	-	-	-	-	-	-	-	-	-	3.0 ± 1.1	2.1 ± 0.9	3.4 ± 0.6	3.0 ± 1.1	1.2 ± 0.7	2.3 ± 1.0
M-90	11 ± 7	17 ± 5	15 ± 4	2.4 ± 1.0	16.9 ± 2.7	11.2 ± 2.0	-	-	-	-	-	-	-	-	-	-	-	-
M-96	3 ± 6	2 ± 3	2 ± 3	0.8 ± 0.6	1.04 ± 0.67	<0.94 ± 0.74	-	-	-	-	-	-	-	-	1.4 ± 0.6	1.1 ± 0.7	NS	3.1 ± 0.8
M-104	-	-	-	-	-	-	-	-	-	-	13.4 ± 2.4	4.8 ± 2.8	10.7 ± 1.0	26 ± 5	11.1 ± 1.1	16.5 ± 4.5	13.8 ± 1.1	29 ± 4
M-105	-	-	-	-	-	-	-	-	-	-	-	-	-	15.5 ± 1.9	8.2 ± 1.8	4.2 ± 1.2	3.4 ± 1.0*	2.6 ± 0.9*
M-107	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.5 ± 1.1	1.0 ± 1.5	4.4 ± 1.5*	4.0 ± 1.2
M-109	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
M-110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
M-111	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
M-112	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
M-113	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Confining Layer 2 Monitor Wells																		
M-114	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
M-115	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Deep Surficial Aquifer Wells																		
M-22	55 ± 39	<1 ± 19	110 ± 66	16.3 ± 6.5	84 ± 19	66 ± 18	36 ± 6	23 ± 2	7.8 ± 1.9	26.0 ± 4.0	31.0 ± 5.0	16.8 ± 3.4	21 ± 4	19.7 ± 3.5	8.3 ± 2.2	8.6 ± 2.2	11.0 ± 2.3	9.0 ± 1.6
M-40	1 ± 3	<1 ± 5	5 ± 3	1.6 ± 1.1	3.8 ± 2.3	<1.9 ± 3.1	-	-	-	-	-	2.4 ± 1.2	3.7 ± 1.8	22 ± 1	0.8 ± 0.9	2.0 ± 1.0	1.6 ± 1.2*	3.1 ± 1.2
M-73	84 ± 61	96 ± 78	120 ± 63	23.6 ± 10.9	30 ± 13	13.2 ± 7.6	8.9 ± 4.6	139 ± 12	13.5 ± 4.3	28.0 ± 2.0	34.0 ± 2.0	16.6 ± 2.4	29 ± 2	21 ± 1	14.1 ± 1.1	42 ± 2	24 ± 2	28 ± 3
M-74	<1 ± 5	2 ± 3	-	-	<1.1 ± 1.1	<1.3 ± 1.7	-	-	-	-	-	-	-	-	-	-	-	-
M-76	3 ± 4	3 ± 9	5 ± 28	1.2 ± 2.2	<1.2 ± 7.0	<-1.6 ± 5.8	0.0 ± 3.6	4.3 ± 3.8	3.4 ± 2.9	-	-	-	-	-	4.2 ± 0.7	4.8 ± 0.8	NS	4.7 ± 1.4
M-80	<1 ± 42	<1 ± 24	67 ± 44	2.7 ± 1.8	<2.4 ± 2.0	<1.6 ± 4.0	-	-	-	-	-	-	-	-	0.6 ± 0.7	0.0 ± 1.2	2.0 ± 1.6	3.0 ± 1.8
M-81	3 ± 6	9 ± 14	34 ± 50	8.2 ± 5.6	<4.5 ± 6.6	<-1.0 ± 7.6	4.4 ± 4.2	2.5 ± 1.5	1.4 ± 1.3	-	-	-	-	-	2.3 ± 1.8	0.9 ± 2.1	1.6 ± 1.5	2.1 ± 1.1
M-86	6 ± 5	3 ± 4	5 ± 3	3.5 ± 1.4	8.4 ± 2.9	9.1 ± 6.3	8.6 ± 2.3	17.7 ± 3.7	6.0 ± 1.8	-	-	-	-	-	7.1 ± 1.6	4.8 ± 1.4	4.7 ± 1.4	8.7 ± 1.1
M-87	2 ± 4	<1 ± 3	3 ± 3	1.0 ± 1.8	<1.1 ± 1.6	<1.1 ± 2.7	-	-	-	-	-	-	-	-	1.2 ± 0.7	0.3 ± 0.9	1.1 ± 1.6	5.0 ± 1.3
M-91	<1 ± 4	3 ± 3	<1 ± 2	7.7 ± 2.3	8.1 ± 1.9	12.7 ± 2.6	-	-	-	-	-	-	-	-	-	-	-	-
M-94	2 ± 4	6 ± 4	11 ± 4	9.8 ± 3.0	5.1 ± 3.0	12.6 ± 7.1	3.4 ± 1.6	0.0 ± 4.1	15.6 ± 4.5	25.0 ± 2.0	27.0 ± 2.0	22 ± 3	11.2 ± 1.0	6.6 ± 0.8	14.3 ± 1.2	14.4 ± 1.2	NS	11.5 ± 2.1
M-95	15 ± 18	14 ± 42	75 ± 57	3.6 ± 6.4	<-11 ± 12	<4 ± 12	0.0 ± 19.5	14.6 ± 5.1	6.5 ± 4.7	6.4 ± 0.9	5.4 ± 1.6	5.8 ± 1.8	2.1 ± 0.5	3.2 ± 0.6	2.6 ± 0.5	2.8 ± 0.6	NS	5.7 ± 2.3
M-101	-	-	-	-	-	-	-	-	-	-	7.1 ± 0.9	3.2 ± 3.2	2.1 ± 0.5	2.1 ± 0.5	1.0 ± 2.5	4.1 ± 3.2	2.3 ± 0.5*	2.9 ± 0.8
M-102	-	-	-	-	-	-	-	-	-	-	6.1 ± 3.5	7.4 ± 3.4	3.3 ± 0.6	2.4 ± 0.5	3.4 ± 2.8	4.8 ± 0.8	3.9 ± 0.7*	5.8 ± 1.6
M-103	-	-	-	-	-	-	-	-	-	-	12.1 ± 5.1	6.1 ± 1.7	4.7 ± 0.7	3.7 ± 0.6	3.3 ± 0.6	5.8 ± 0.9	5.8 ± 0.8	5.0 ± 1.4
M-106	-	-	-	-	-	-	-	-	-	-	-	-	-	1.8 ± 2.4	3.6 ± 2.0	1.1 ± 1.6	NS	2.2 ± 1.4
M-108	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.2 ± 1.5	1.8 ± 1.1*	4.7 ± 1.1

Note: Mean concentrations that exceed the extraction and discharge standard of 15 pCi/L are shaded and bolded.

* Dissolved concentration.

** Samples collected on September 5, 2014.

NS - Not Sampled

Table I-2: June 2019 Groundwater Results – Tier 2 Contaminants

Well	Concentration (µg/L)						
	Lead (Pb)		Cadmium (Cd)		Benzene (B)	Tetrachloroethene (PCE)	Vinyl Chloride (VC)
	Total	Dissolved	Total	Dissolved			
• Shallow Surficial Aquifer Monitor Wells							
M-19	1.3 I	0.98 U	0.15 U	0.15 U	NA	NA	NA
M-25	0.98 U	0.98 U	0.15 U	0.16 I	NA	NA	NA
M-50	13	7.0	0.15 U	0.18 I	NA	NA	NA
• Deep Surficial Aquifer Monitor Wells							
M-22	0.98 U	0.98 U	0.15 U	0.15 U	NA	NA	NA
M-73	1.2 I	1.0 I	NA	NA	0.25 U	0.50 U	0.26 U
M-80	0.98 U	0.98 U	NA	NA	0.25 U	0.50 U	0.26 U
M-86	NA	NA	NA	NA	1.5	0.50 U	0.26 U
MCL	15		5		1	3	1

Note: Concentrations that exceed standards are shaded and bolded.

MCL Maximum contaminant level

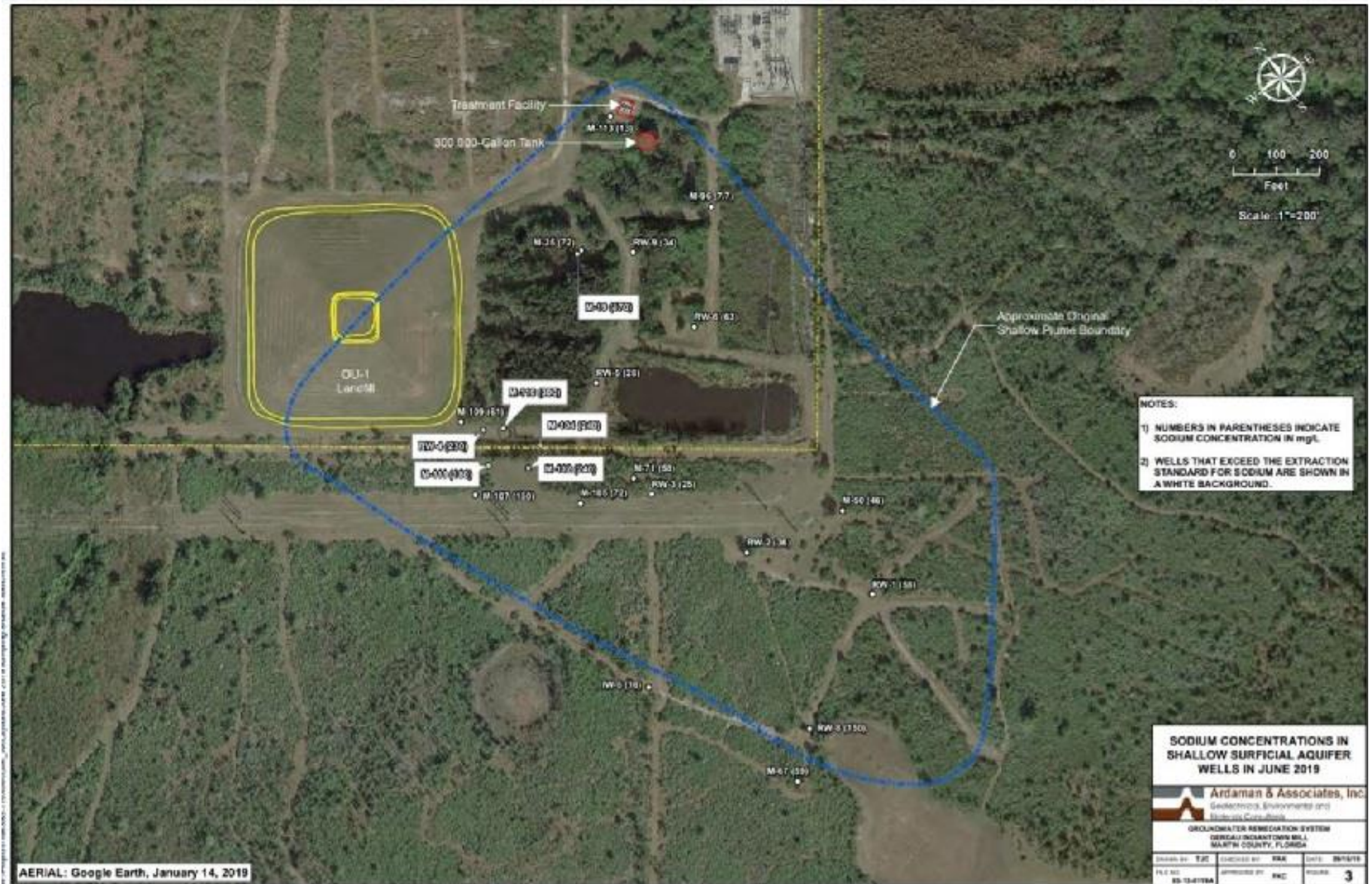
NA Not analyzed

U Result is less than the sample minimum detection limit.

I The reported value is between the laboratory method detection limit (MDL) and the laboratory practical quantitation limit (PQL).

Source: Table 2 of the October 2019 Results of Groundwater Sampling Event in June 2019 for Operable Unit 2, Gerdau Ameristeel Indiantown Mill

Figure I-1: Sodium Concentrations in Shallow Surficial Aquifer Wells in June 2019



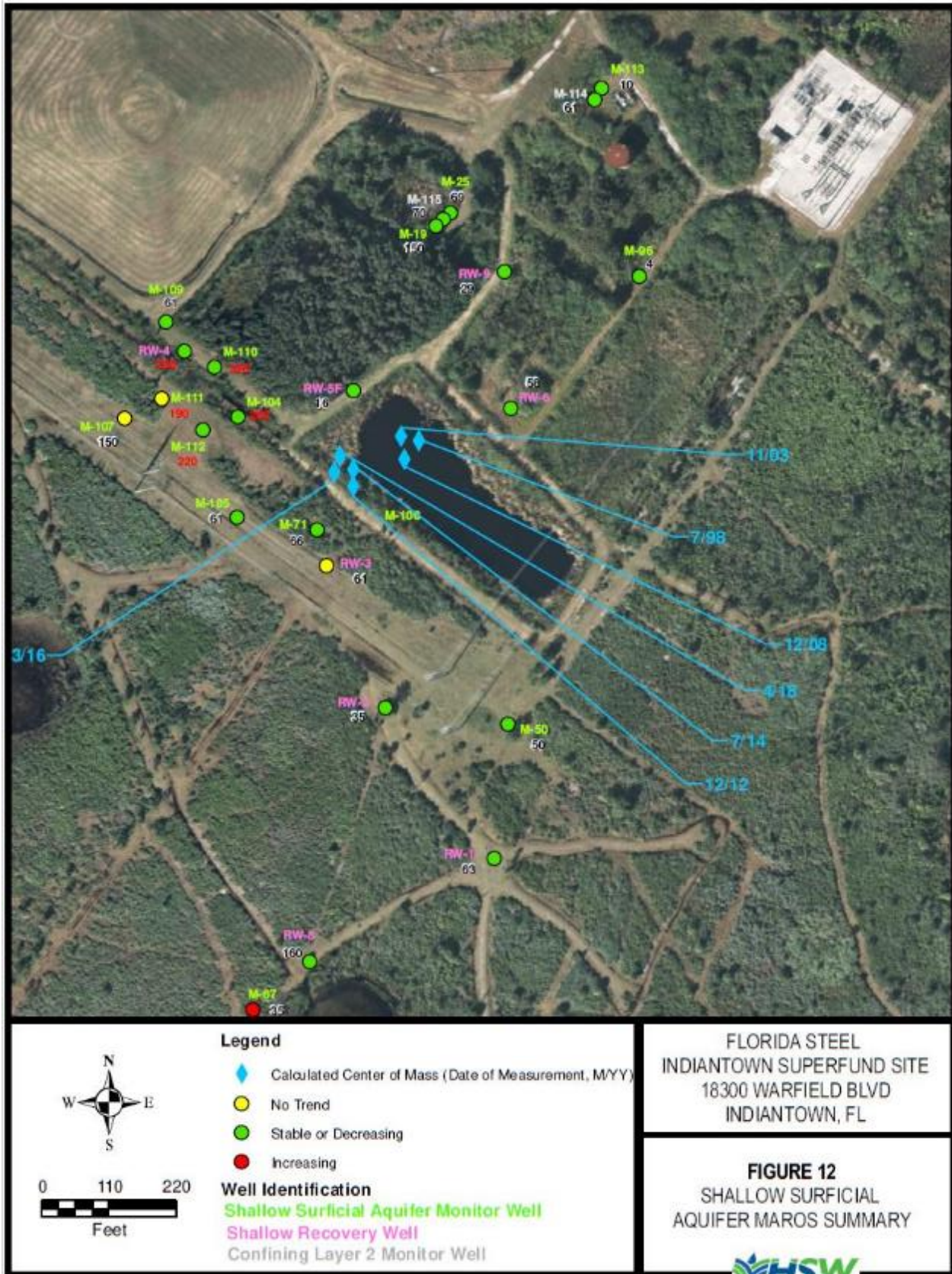
Source: October 2019 Results of Groundwater Sampling Event in June 2019 for Operable Unit 2, Gerdau Ameristeel Indiantown Mill

Figure I-2: Sodium Concentrations in Deep Surficial Aquifer Wells



Source: October 2019 Results of Groundwater Sampling Event in June 2019 for Operable Unit 2, Gerdau Ameristeel Indiantown Mill

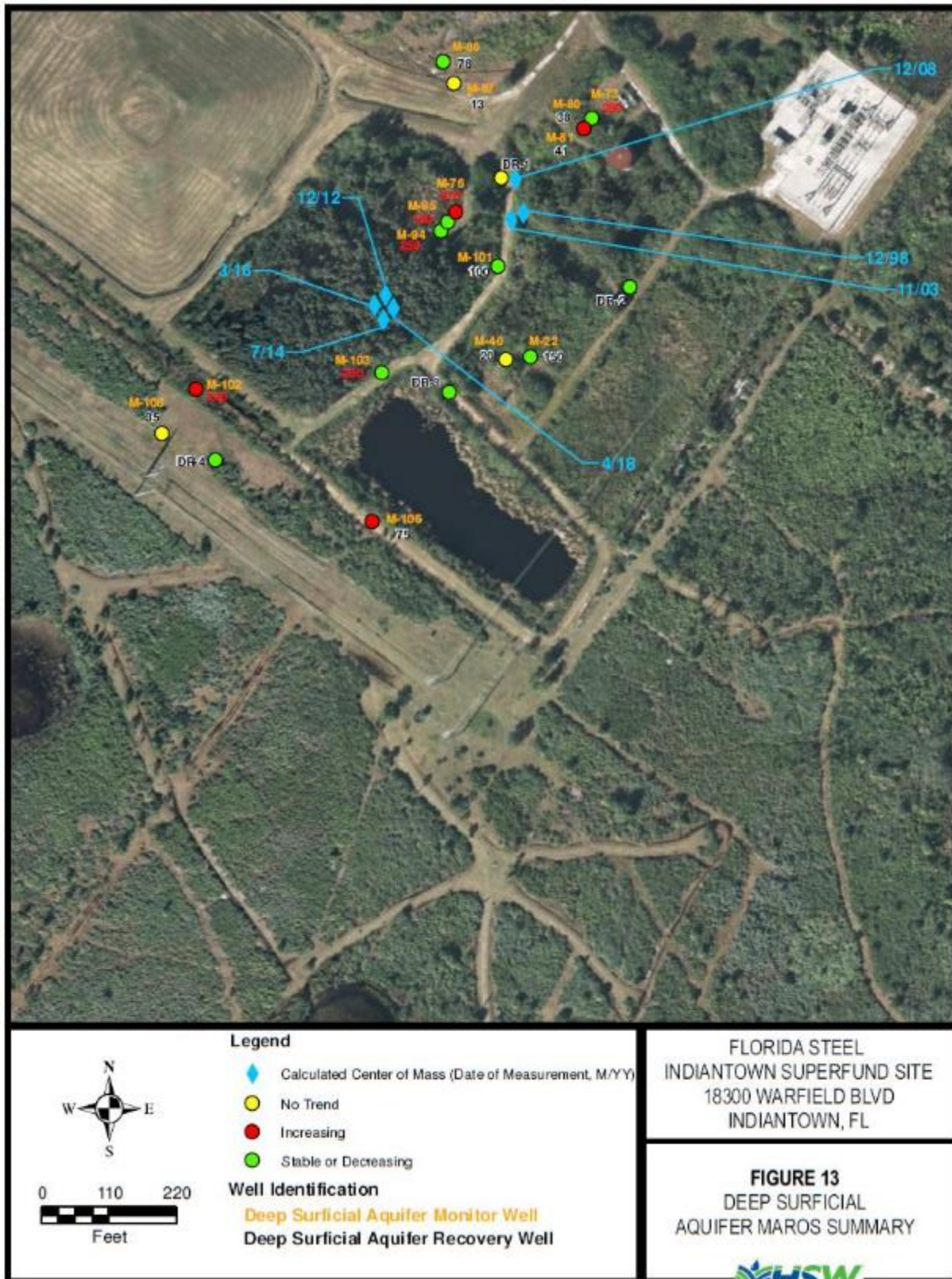
Figure I-3: Shallow Surficial Aquifer Trend Summary for Sodium



C:\Projects\1CG700201_Indiantown\Maps\1CG700201 Shallow MAROS Summary.mxd User: rbarney

Source: January 2019 Operable Unit 2 Supplemental Remedy Investigation

Figure I-4: Deep Surficial Aquifer Trend Summary for Sodium



D:\Project\1CG700201_Indiantown\Map\1CG700201_Deep MAROS Summary.mxd User: rbonnes

Source: January 2019 Operable Unit 2 Supplemental Remedy Investigation

Figure I-5: June 2019 Radionuclide Exceedances in Deep Surficial Aquifer Wells



Source: October 2019 Results of Groundwater Sampling Event in June 2019 for Operable Unit 2, Gerdau Ameristeel Indiantown Mill

On Jan 13, 2020, at 1:49 PM, Richards, Jon M. <Richards.Jon@epa.gov> wrote:

Joydeb,

I was on a conf call in Nov, 2019, with FL's rad health manager, and the FL Drinking Water lead, who both confirmed they have no concerns with the radium results in a few of the groundwater wells that are elevated above the MCL, and were determined to be slightly elevated natural background levels. This is not uncommon for radium in groundwater in the southeast, and Florida. Both did not see any reason to be concerned that these occasional elevated radium levels would be harmful to any future receptors, or would cause any type of remedial action.

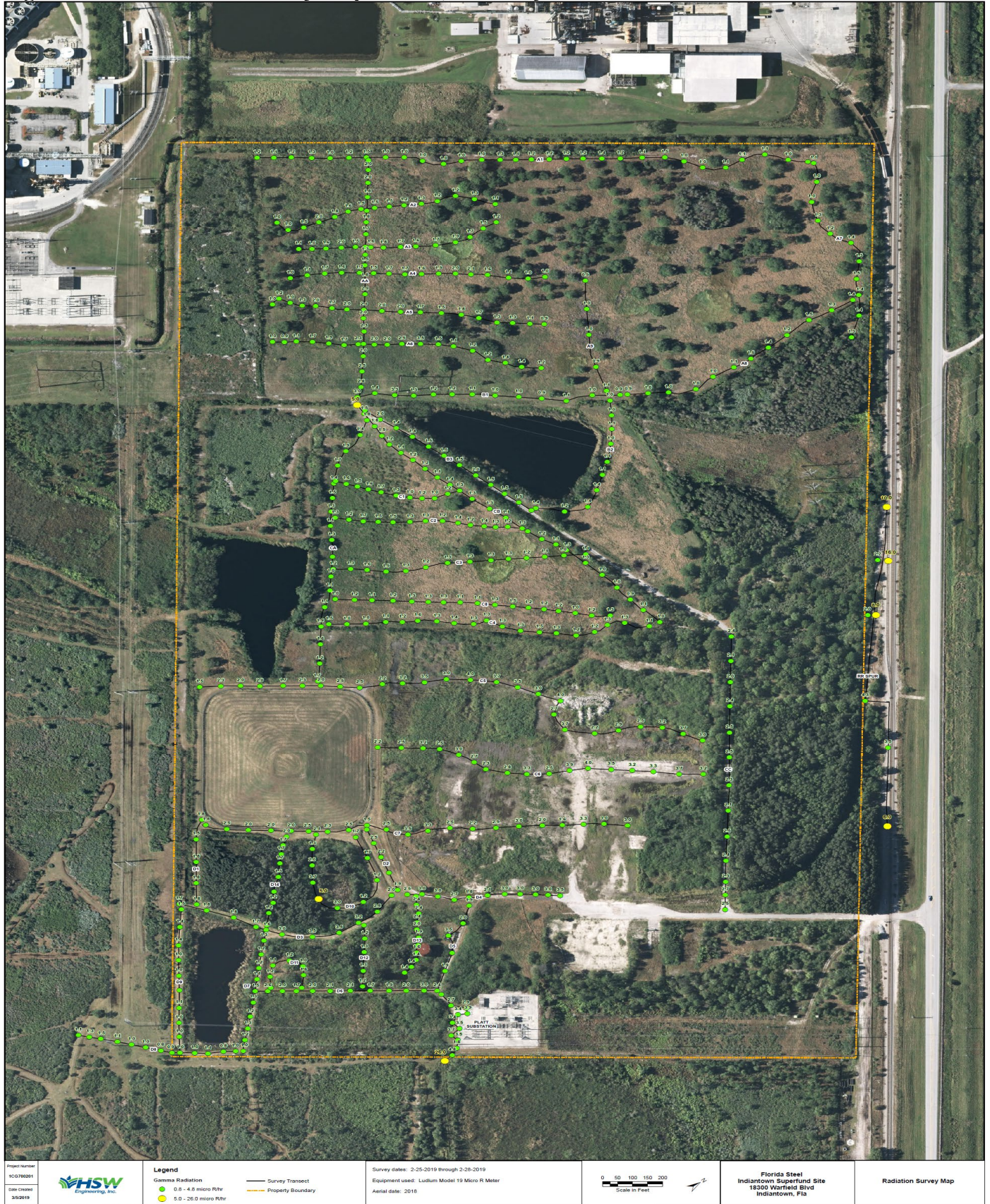
One of the other key lines of evidence, was determined early in 2019, that there was no apparent source of radium from the site, which would not be uncommon from a steel mill. But, no source was found in the remaining areas or surface, subsurface from the footprint of the site.

So, in summary, I see no reason to consider the occasional elevated Radium results in a few wells as any current or future concern for this site.

Let me know if you need anything else,
thanks

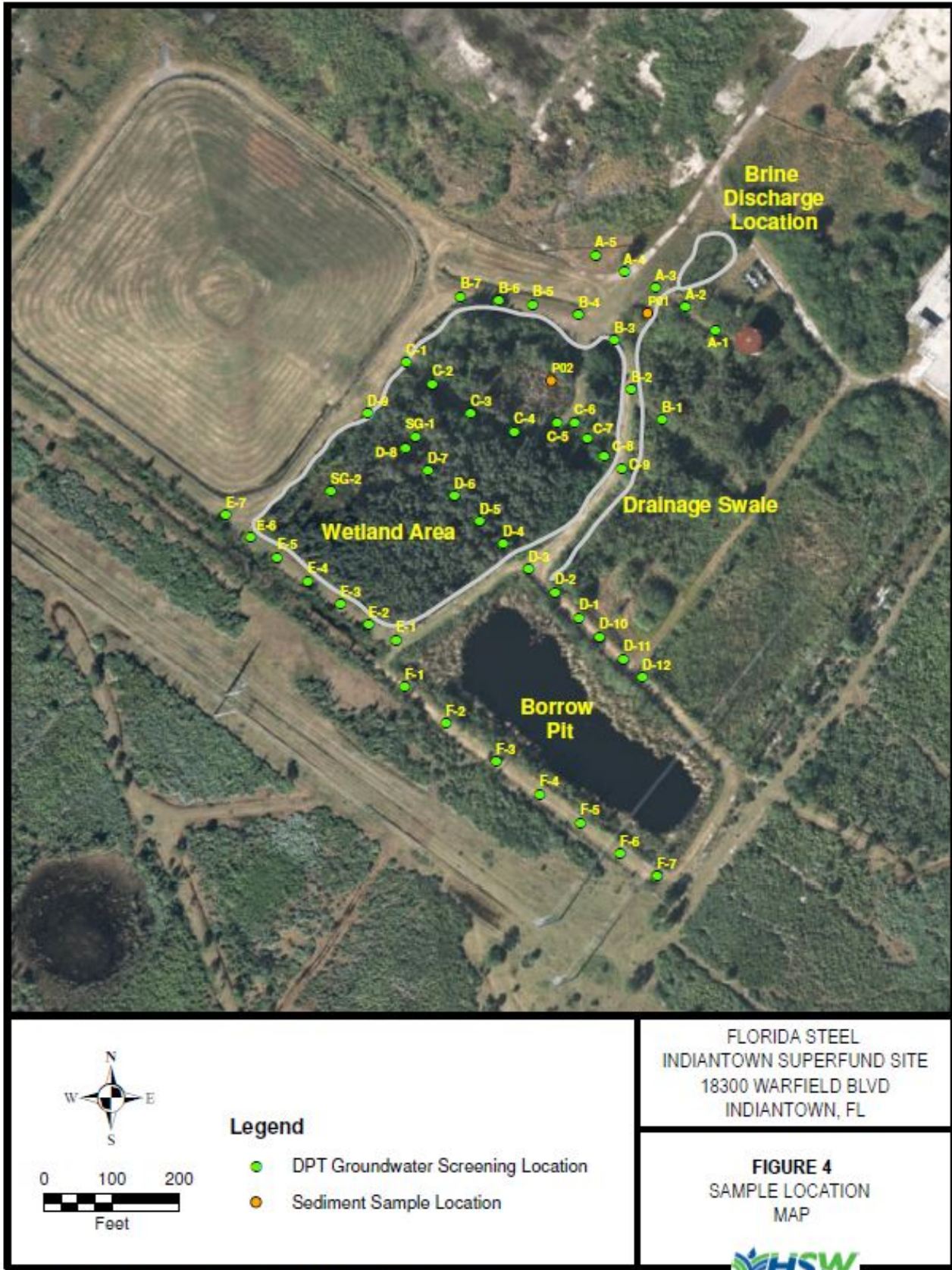
Jon Richards
FFA RPM & Radiation Expert
US EPA R4 Superfund Division
Restoration & Site Evaluation Branch
Richards.jon@epa.gov
404-562-8648 Cell: 404-431-1340

Figure I-6: Radionuclide Survey Map Results, February 2019



Source: January 2019 Operable Unit 2 Supplemental Remedy Investigation

Figure I-7: Sediment Sample Locations



Source: January 2019 Operable Unit 2 Supplemental Remedy Investigation

APPENDIX J – ARARS REVIEW

CERCLA Section 121(d)(1) requires that Superfund remedial actions attain “a degree of cleanup of hazardous substance, pollutants, and contaminants released into the environment and control of further release at a minimum which assures protection of human health and the environment.” The remedial action must achieve a level of cleanup that at least attains those requirements that are legally applicable or relevant and appropriate. In performing the FYR for compliance with ARARs, only those ARARs that address the protectiveness of the remedy are reviewed.

Groundwater

According to the 1994 OU-2 ROD, groundwater ARARs include the federal and state primary drinking water standards or MCLs. Table 8 of the OU-2 ROD set groundwater extraction and discharge standards for three COCs: sodium, radium 226 + radium 228, and gross alpha. These COCs are also identified as Tier 1 groundwater contaminants in Table 9 of the OU-2 ROD. As shown in Table J-1, groundwater MCLs for the three COCs/Tier 1 groundwater contaminants have not changed since the signing of the OU-2 ROD.

Table 9 of the OU-2 ROD also identified five Tier 2 groundwater contaminants that required continued compliance monitoring. The OU-2 ROD identified state and federal MCLs for these Tier 2 groundwater contaminants. As shown in Table I-1, groundwater MCLs for the five Tier 2 groundwater contaminants have not changed since the signing of the OU-2 ROD.

The groundwater cleanup levels selected in the 1994 OU-2 ROD remain valid.

Table J-1: 1994 OU-2 ROD ARARs and 2020 ARARs for Groundwater Contaminants

Groundwater Contaminant	1994 ARARs in OU-2 ROD ^a		2020 ARARs		ARARs Change
	Federal MCL	State MCL	Federal MCL ^b	State MCL ^c	
<i>Tier 1</i>					
Sodium (mg/L)	NA	160	NA	160	No change
Radium 226+228 (pCi/L)	5	5	5	5	No change
Gross alpha (pCi/L)	15	15	15	15	No change
<i>Tier 2</i>					
Cadmium (mg/L)	0.005	0.005	0.005	0.005	No change
Lead (mg/L)	0.015	0.015	0.015 ^d	0.015	No change
Benzene (mg/L)	0.005	0.001	0.005	0.001	No change
Tetrachloroethene (mg/L)	0.005	0.003	0.005	0.003	No change
Vinyl chloride (mg/L)	0.002	0.001	0.002	0.001	No change
<p><i>Notes:</i></p> <p>a. Values from Tables 8 and 9 of the 1994 OU-2 ROD.</p> <p>b. Federal MCLs are available at http://www.epa.gov/your-drinking-water/table-regulated-drinking-water-contaminants#Organic (accessed 12/22/2020).</p> <p>c. State MCLs are available at https://www.flrules.org/gateway/readFile.asp?sid=0&type=1&tid=17870715&file=62-550.828.doc (accessed 12/22/2020); radionuclide state MCLs are available at https://www.flrules.org/gateway/RuleNo.asp?title=DRINKING%20WATER%20STANDARDS,%20MONITORING,%20AND%20REPORTING&ID=62-550.519 (accessed 12/22/2020).</p> <p>d. Action level.</p> <p>mg/L = milligrams per liter pCi/L = picocuries per liter NA = not applicable; ARAR not established</p>					

Soil

The 1992 OU-1 ROD identified a PCB soil cleanup level of 25 mg/kg based on the TSCA PCB Spill Cleanup Policy (40 CFR, Part 761, Subpart G) for areas with restricted access. Soil with PCBs above 50 mg/kg were shipped off site to an approved disposal facility consistent with TSCA regulations. The PCB soil cleanup level of 25 mg/kg in restricted access areas has not changed.

The 1992 OU-1 ROD identified a lead cleanup level of 600 mg/kg. The value is based on the leachability of lead from soil into groundwater and is not ARAR-based.

Although not identified as an ARAR in the 1992 OU-1 ROD, the state of Florida developed soil cleanup target levels (SCTLs) under Florida Administrative Code (FAC) Chapter 62-777 in February 2005. A leachability-based SCTL for lead was not established (https://floridadep.gov/sites/default/files/1-TechnicalReport2FinalFeb2005_0.pdf).

The direct exposure SCTL for lead is 1,200 under a commercial/industrial use scenario (400 mg/kg for residential). The direct exposure SCTL for PCBs is 2.6 mg/kg for commercial/industrial; 0.5 for residential.

APPENDIX K – INSTITUTIONAL CONTROLS

1990 and 2015 Declarations of Restrictive Covenants

1990 Declaration of Restrictive Covenants, Conditions and Restrictions

RECORD VERIFIED

844108

This Instrument Prepared By
and Should Be Returned to:
BENJAMIN G. MORRIS, ESQUIRE
Allen, Dell, Frank & Trinkle
P. O. Box 2111
Tampa, Florida 33602-2111

DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS

FLORIDA STEEL CORPORATION of 1715 Cleveland Street,
Tampa, Florida 33606 is the owner in fee simple of the following
described real property located in Martin County, Florida:

Parcel I:

Commence at a point 100 feet southwestwardly measured at right angles, from the center line of Seaboard Coast Line Railroad Company's main track, said point being on the east line of said Section 35, and run northwestwardly, parallel with said center line, 900 feet; thence southwestwardly, at right angles from the last described course, 700 feet to the POINT OF BEGINNING of the parcel of land hereinafter described; thence continue southwestwardly, along the last described course, 1300 feet; thence northwestwardly, at right angles from the last described course and 2100 feet southwestwardly from said center line, 3300 feet; thence northeastwardly, at right angles from the last described course, 1300 feet; thence southeastwardly, at right angles from the last described course and 800 feet southwestwardly from said center line, 3300 feet to the POINT OF BEGINNING; containing 98.48 acres, more or less, and being shown outlined in YELLOW as Parcel "B" on print of undated survey prepared by Schwabke-Shiskin & Associates, Inc., which print is attached hereto and made a part hereof; and

Parcel II:

Commence at a point 100 feet southwestwardly, measured at right angles, from the center line of Seaboard Coast Line Railroad Company's main track, said point being on the east line of said Section 35, and run northwestwardly, parallel with said center line, 900 feet to the POINT OF BEGINNING of the parcel of land hereinafter described; thence continue northwestwardly, along the last described course, 3300 feet; thence southwestwardly, at right angles from the last described course, 700 feet; thence southeastwardly, at right angles

RECORDED 08/10/16

from the last described course and 800 feet southwestwardly; measured at right angles, from said center line, 3300 feet; thence northeastwardly, at right angles from the last described course; 700 feet to the POINT OF BEGINNING; containing 53.03 acres, more or less, and being shown outlined in YELLOW as Parcel "A" on print of undated survey prepared by Schwabko-Shiskin & Associates, Inc., which print is attached hereto and made a part hereof.

This declaration is for the purpose of recording the following restrictive covenants which shall be deemed to be covenants running with the above-described land ("the Property") and shall be enforceable by all interested parties and all persons claiming under them, including the Grantor, the United States Environmental Protection Agency, Florida Department of Environmental Regulation and all applicable similar or successor regulatory bodies or agencies.

The following restrictions shall apply to the Property herein conveyed:

1. The Property shall not be used for residential purposes;
2. No day care facilities, kindergartens, playgrounds, schools or other facilities catering to children under the age of sixteen years shall be operated on the Property.
3. The Property shall not be used for swimming, fishing, camping or hunting.
4. No structures or improvements intended for use for recreational purposes shall be constructed or operated on the Property.
5. The Property shall not be used for the purpose of growing any crops to provide food for humans or animals.

The above restrictions are being placed on the Property in the interest of protecting the health and welfare of the general public due to soil contamination currently existing on portions of said Property, which contamination is expected to remain at levels which will, in the view of the U.S. Environmental Protection Agency and the Florida Department of Environmental Regulation, render it unsuitable for any of the above uses for a currently indeterminable period of time. Said property may however, be used for commercial, public utility (including, without limitation, electric transmission, distribution and power generation facilities) and industrial purposes.

TO HAVE AND TO HOLD the same, together with all and singular the appurtenances therunto belonging or in anywise appertaining, and all the estate, right, title, interest and claim whatsoever of the Grantor, either in law or equity, subject to the afore-described restrictions.

IN WITNESS WHEREOF, the FLORIDA STEEL CORPORATION has caused its corporate seal to be hereunto affixed and this instrument to be signed by its duly authorized officer the day and year first above written.

Signed, sealed and delivered
in our presence:

Edward K. Stem
Cassandra Spigler

By: Thomas J. Caud

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I HEREBY CERTIFY that on this date before me, an officer duly authorized in the state and county named above, to take acknowledgements, personally appeared Thomas J. Caud, as President of FLORIDA STEEL CORPORATION, this day acknowledged before me that he executed the foregoing instrument as such officer of said corporation, and that he affixed thereto the official seal of said corporation; and I further certify that I know the said person making said acknowledgement to be the individual described in and who executed the same.

WITNESS my hand and official seal at Tampa, County of Hillsborough, and State of Florida, this 22nd day of August, 1990.

Patricia E. Caspell
NOTARY PUBLIC
My Commission Expires
Notary Public State of Florida #11111
My Commission Expires Apr. 1, 1991

FILED FOR RECORD
MARTIN COUNTY
90 AUG 24 AM 9:24
MARK O. BRADY
CLERK OF CIRCUIT COURT
BY

2015 Declaration of Restrictive Covenants

This instrument prepared by and return to:

David R. Brittain, Esq.
Law Firm of Trenam Kemker
Bank of America Plaza
101 E. Kennedy Boulevard, Suite 2700
Tampa, Florida 33602

DECLARATION OF RESTRICTIVE COVENANTS

This Declaration of Restrictive Covenants (hereinafter "Declaration") is given this 14th day of April, 2015, by **GERDAU AMERISTEEL US INC.**, a Florida corporation, successor by merger to Florida Steel Corporation (hereinafter the "GRANTOR"), having an address of 4221 W. Boy Scout Blvd., Tampa, Hillsborough County, Florida to the **STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION** (hereinafter "FDEP" or "GRANTEE").

RECITALS

- A. **WHEREAS**, GRANTOR is the fee simple owner of certain real property situated in Martin County, State of Florida, more particularly described in **Exhibit "A"** attached hereto and made a part hereof (hereinafter, the "Property"), which consists of approximately 150 acres.
- B. **WHEREAS**, the Property is the site of a former steel mill operated by Florida Steel Corporation ("FSC"), the predecessor in title and interest to AmeriSteel Corporation ("ASC"), GRANTOR's predecessor in title and interest, from November, 1970 until February, 1982, at which time the steel mill was closed.
- C. **WHEREAS**, the Property subject to this restrictive covenant is a portion of the property known as the Florida Steel Corporation Superfund Site ("Site"), which the U.S. Environmental Protection Agency ("EPA"), pursuant to section 105 of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9605, proposed for the National Priorities List, set forth at 40 C.F.R. Part 300, Appendix B, by publication in the Federal Register on September 8, 1983, at 48 Fed. Reg. 175.
- D. **WHEREAS**, in a Record of Decision for Operable Unit I dated June 30, 1992 ("ROD OU1"), the EPA Region 4 Regional Administrator selected a "remedial action" for soil at the Site.
- E. **WHEREAS**, in a Record of Decision for Operable Unit II dated March 30, 1994 ("ROD OU2"), the EPA Region 4 Regional Administrator selected a "remedial

Recorded in Martin County, FL Carolyn Timmann, Clerk of Courts 04/22/2015 03:29:45 PM

CFN# 2510677 OR BK 2779 PG 407 PAGE 1 OF 22

action" for wetlands and groundwater at the Site.

- F. **WHEREAS**, the remedial action selected pursuant to ROD OU1 has been completed on the Site.
- G. **WHEREAS**, a remedial action selected pursuant to the ROD OU2 has been implemented at the Site and is continuing with respect to groundwater contamination.
- H. **WHEREAS**, contaminants in excess of allowable concentrations for unrestricted use will remain on portions of the Property related to groundwater after completion of the remedial action.
- I. **WHEREAS**, it is the intent of the restrictions in this declaration to reduce or eliminate the risk of exposure of the contaminants to the environment and to users or occupants of the Property and to reduce or eliminate the threat of migration of the contaminants.
- J. **WHEREAS**, it is the intention of all parties that EPA is a third party beneficiary of said restrictions and said restrictions shall be enforceable by the EPA, FDEP, and their successor agencies.
- K. **WHEREAS**, the parties hereto have agreed 1) to impose on the Property use restrictions as covenants that will run with the land for the purpose of protecting human health and the environment; and 2) to grant an irrevocable right of access over the Property to the GRANTEE and its agents or representatives for purposes of implementing, facilitating and monitoring the remedial action; and
- L. **WHEREAS**, GRANTOR deems its desirable and in the best interest of all present and future owners of the Property that the Property be held subject to certain restrictions and changes, that will run with the land, for the purpose of protecting human health and the environment, all of which are more particularly hereinafter set forth.

NOW THEREFORE, GRANTOR, on behalf of itself, its successors, its heirs, and assigns, in consideration of the recitals above, the terms of the Record of Decision I and II, and other good and valuable consideration, the adequacy and receipt of which is hereby acknowledged, does hereby covenant and declare that the Property shall be subject to the restrictions on use set forth below, which shall touch and concern and run with the title of the property, and does give, grant and convey to the GRANTEE, and its assigns, 1) an irrevocable use restriction and site access covenant of the nature and character, and for the purposes hereinafter set forth and 2), the perpetual right to enforce said covenants and use restrictions, with respect to the Property. GRANTOR further agrees as follows:

- a. The foregoing recitals are true and correct and are incorporated herein by reference.
- b. GRANTOR hereby imposes on the Property the following restrictions:
 - 1. **Restrictions on Use:** The following covenants, conditions, and restrictions apply to the use of the Property:
 - a. Groundwater containing constituents above State groundwater standards or the groundwater cleanup standards identified in the ROD OU2 shall not be used until such standards are met.
 - b. There shall be no drilling for water conducted on the Property in the area more particularly described on **Exhibit "B"** ("Well Restriction Area"), nor shall any wells, including monitoring wells, be installed in the Well Restriction Area unless pre-approved by FDEP and EPA. For clarity, the prior approval restriction does not apply to uses previously approved by EPA including without limitation, the groundwater withdrawals described in August 20, 2007 correspondence from EPA to a representative for Floridian Gas Storage (included in Appendix 2-I to Resource Report 2, a component of the Application of Floridian Gas Storage filed with the Federal Energy Regulatory Commission (FERC) on October 31, 2007 in FERC Docket No. CP08-13).
 - c. Attached as **Composite Exhibit "C"**, and incorporated by reference herein, is a survey map identifying the size and location of existing stormwater swales, stormwater detention or retention facilities, and ditches on the Property. Existing stormwater features within the Well Restriction Area shall not be altered, modified or expanded without prior approval from the FDEP and EPA. Additionally, there shall be no construction of new stormwater swales, stormwater detention or retention facilities or ditches in the Well Restriction Area without prior written approval from the FDEP and EPA. The stormwater features authorized by and depicted in the Environmental Resources Permit (Modification) No. EM 43-0280459-004 for the Floridian Natural Gas Storage project constitute an alteration in the existing stormwater features that has been preapproved by the FDEP and EPA.
 - d. For any dewatering activities, a plan must be submitted and approved by FDEP and EPA to address and ensure the appropriate handling, treatment, and disposal of any extracted groundwater that may be contaminated.
 - e. The Property shall only be used for commercial and/or industrial purposes. There shall be no agricultural use of the land including forestry, fishing and mining; no hotels or lodging; no recreational uses including amusement parks, parks, camps, museums, zoos, or gardens; no residential uses, and no educational uses such as elementary and secondary schools, or day care services. These restrictions may only be modified pursuant to Paragraph 3 of

this Declaration. If the Property is to be used other than for commercial and/or industrial purposes, prior written approval for such other use must be obtained from the FDEP and EPA, and may require additional response actions.

- f. The construction, operation, and maintenance of a public or private natural gas storage facility, pipelines, and ancillary facilities, including, without limitation, the Floridian Gas Storage Project authorized by the Certificate issued by the Federal Energy Regulatory Commission [FERC] in FERC Docket No. CP08-13, as amended and as may be amended or supplemented subsequent to the date hereof, shall be considered as commercial and/or industrial processes for purposes of these restrictions.
 - g. There shall be no use of the Landfill Vault, as described in **Exhibit "D"** attached hereto and made a part hereof, for any purpose, other than its use as a landfill for materials containing contamination, without the express prior written consent of FDEP and EPA. Additionally, there shall be no activity or construction on, nor any improvement or alteration of, the Landfill Vault at any time that could damage or impair its structural integrity, including without limitation the structural integrity of the landfill cap, liner, or control structures or equipment, without the express prior written consent of FDEP and EPA.
 - h. These restrictions may only be modified pursuant to Paragraph 3 of this Declaration. For any construction activities, a plan must be submitted and approved by FDEP and EPA to address and ensure the appropriate management of any contaminated soil that may be encountered.
2. **Irrevocable Covenant for Site Access:** GRANTOR hereby grants to the GRANTEE, its agents and representatives, an irrevocable, permanent and continuing right of access at all reasonable times to the Property subject to reasonable security and safety protocols of GRANTOR regarding access on the Property for purposes of:
- a. Implementing the response actions in ROD OU2;
 - b. Verifying any data or information submitted to EPA and GRANTEE;
 - c. Verifying that no action is being taken on the Property in violation of the terms of this instrument or of any federal or state environmental laws or regulations;
 - d. Monitoring response actions on the Site and conducting investigations relating to contamination on or near the Site, including, without limitation, sampling of air, water, sediments, soils, and specifically, without limitation, obtaining split or duplicate samples; and

- e. Conducting periodic reviews of the remedial action, including but not limited to, reviews required by applicable statutes and/or regulations.
3. **Modification:** This Declaration shall not be modified, amended, or terminated without the written consent of FDEP and GRANTOR. FDEP shall not consent to any such modification, amendment or termination without the written consent of EPA.
4. **Reserved Rights of GRANTOR:** GRANTOR hereby reserves unto itself, its successors, its heirs, and assigns, all rights and privileges in and to the use of the Property which are not incompatible with the restrictions, rights and covenants granted herein.
5. **Reserved Rights of EPA:** Nothing in this document shall limit or otherwise affect EPA's rights of entry and access or EPA's authority to take response actions under CERCLA, the NCP, or other federal law.
6. **Reserved Rights of GRANTEE:** Nothing in this document shall limit or otherwise affect GRANTEE's rights of entry and access or authority to act under state or federal law.
7. **Notice Requirement:** GRANTOR agrees to include in any instrument by which GRANTOR conveys any interest in any portion of the Property, including but not limited to deeds, leases and mortgages, a notice which is in substantially the following form:

NOTICE: THE INTEREST CONVEYED HEREBY IS SUBJECT TO A DECLARATION OF RESTRICTIVE AND AFFIRMATIVE COVENANTS, DATED _____, 200_, RECORDED IN THE PUBLIC LAND RECORDS ON _____, 20___, IN BOOK _____, PAGE _____, IN FAVOR OF, AND ENFORCEABLE BY, THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION.

Within thirty (30) days of the date any such instrument of conveyance is executed, GRANTOR must provide GRANTEE and EPA with a certified true copy of said instrument redacted for any commercially sensitive or commercially proprietary information and, if it has been recorded in the public land records, its recording reference.

8. **Administrative Jurisdiction:** FDEP or any successor state agency having administrative jurisdiction over the interests acquired by the State of Florida by this instrument is the GRANTEE. EPA is a third party beneficiary to the interests acquired by the GRANTEE.

9. **Enforcement:** The GRANTEE shall be entitled to enforce the terms of this instrument by resort to specific performance or legal process. These restrictions may also be enforced in a court of competent jurisdiction by any other person, firm, corporation or governmental agency that has standing to do so under Florida law. All remedies available hereunder shall be in addition to any and all other remedies at law or in equity, including CERCLA. It is expressly agreed that EPA is not the recipient of a real property interest but is a third party beneficiary of the Declaration of Restrictive Covenants, and as such, has the right of enforcement. Enforcement of the terms of this instrument shall be at the discretion of the entities listed above, and any forbearance, delay or omission to exercise its rights under this instrument in the event of a breach of any term of this instrument shall not be deemed to be a waiver by the GRANTEE of such term or of any subsequent breach of the same or any other term, or of any of the rights of the GRANTEE under this instrument.
10. **Damages:** GRANTEE shall be entitled to recover damages for violations of the terms of this instrument, or for any injury to the remedial action, to the public or to the environment protected by this instrument, as permitted under applicable law.
11. **Waiver of certain defenses:** GRANTOR hereby waives any defense of laches, estoppel, or prescription.
12. **Covenants:** GRANTOR hereby covenants to and with the GRANTEE, that the GRANTOR is lawfully seized in fee simple of the Property, that the GRANTOR has a good and lawful right and power to sell and convey it or any interest therein, that the Property is free and clear of encumbrances, except those noted on **Exhibit "E"** attached hereto and made a part hereof.
13. **Notices:** Any notice, demand, request, consent, approval, or communication that either party desires or is required to give to the other shall be in writing and shall either be served personally or sent by first class mail, postage prepaid, referencing the Site name and Site ID number and addressed as follows:

To GRANTOR:

Gerdau Ameristeel US Inc.
 c/o Gerdau – Tampa Office
 4221 W. Boy Scout Boulevard,
 Suite 600
 Tampa, FL 33607
 Attn: Legal Department

To GRANTEE:

Director, Division of Waste Management
 FDEP M.S. 4505
 2600 Blair Stone Road
 Tallahassee, FL 32399

To EPA:

U.S. EPA, Region 4
 Waste Management Division

Superfund Remedial and Technical Services Branch
Section Chief, Section D
61 Forsyth Street, SW
Atlanta, GA 30303

14. **Recording in Land Records:** GRANTOR shall record this Declaration of Restrictive and Affirmative Covenants in timely fashion in the Official Records of Martin County, Florida, with no encumbrances other than those noted in **Exhibit "E"**, and shall rerecord it at any time GRANTEE may require to preserve its rights. GRANTOR shall pay all recording costs and taxes necessary to record this document in the public records.

15. **General Provisions:**
 - a. **Controlling law:** The interpretation and performance of this instrument shall be governed by the laws of the United States or, if there are no applicable federal laws, by the laws of the State of Florida.
 - b. **Liberal construction:** Any general rule of construction to the contrary notwithstanding, this instrument shall be liberally construed in favor of the grant to effect the purpose of this instrument and the policy and purpose of CERCLA. If any provision of this instrument is found to be ambiguous, an interpretation consistent with the purpose of this instrument that would render the provision valid shall be favored over any interpretation that would render it invalid.
 - c. **Severability:** If any provision of this instrument, or the application of it to any person or circumstance, is found to be invalid, the remainder of the provisions of this instrument, or the application of such provisions to persons or circumstances other than those to which it is found to be invalid, as the case may be, shall not be affected thereby.
 - d. **Entire Agreement:** This instrument sets forth the entire agreement of the parties with respect to rights and restrictions created hereby, and supersedes all prior discussions, negotiations, understandings, or agreements relating thereto, all of which are merged herein.
 - e. **No Forfeiture:** Nothing contained herein will result in a forfeiture or reversion of GRANTOR's title in any respect.
 - f. **Joint Obligation:** If there are two or more parties identified as GRANTOR herein, the obligations imposed by this instrument upon them shall be joint and several.
 - g. **Successors:** The term "GRANTOR", wherever used herein, and any pronouns used in place thereof, shall include the persons and/or entities named at the

beginning of this document, identified as "GRANTOR" and their personal representatives, heirs, successors, and assigns. The term "GRANTEE", wherever used herein, and any pronouns used in place thereof, shall include the persons and/or entities named at the beginning of this document, identified as "GRANTEE" and their personal representatives, heirs, successors, and assigns. The rights of the GRANTEE and GRANTOR under this instrument are freely assignable, subject to the notice provisions hereof.

- h. Captions: The captions in this instrument have been inserted solely for convenience of reference and are not a part of this instrument and shall have no effect upon construction or interpretation.
- i. Counterparts: The parties may execute this instrument in two or more counterparts, which shall, in the aggregate, be signed by both parties; each counterpart shall be deemed an original instrument as against any party who has signed it. In the event of any disparity between the counterparts produced, the recorded counterpart shall be controlling.

TO HAVE AND TO HOLD unto the State of Florida Department of Environmental Protection and its successors and assigns forever.

[Signature pages to follow.]

IN WITNESS WHEREOF, GRANTOR has caused this Agreement to be signed in its name.

Executed this 8th day of April, 2015.

GRANTOR:

GERDAU AMERISTEEL US INC., a Florida Corporation

By: [Signature]
Name: LUIS A NIEVES
As its: President DIRECTOR ENVIRONMENT
Address: PO BOX 31328 TAMPA, FL 33631

Signed, sealed and delivered in the presence of:

[Signature] DAVID R. BRITTAIN 4-8-15
Witness: Print Name Date
[Signature] Kathryn M. Matyniak 4/8/15
Witness: Print Name Date

STATE OF FLORIDA
COUNTY OF Hillsborough

Director Environment

On this 8th day of April, 2015, before me, the undersigned, a Notary Public in and for the State of Florida, duly commissioned and sworn, personally appeared Luis A. Nieves, known to be the President of Gerdaul Ameristeel US Inc., a Florida corporation, the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that they are authorized to execute said instrument. He is personally known OR had produced identification X. Type of identification produced FL DC.

Witness my hand and official seal hereto affixed the day and year written above.

[Signature]
Notary Public, State of Florida
Kathryn Matyniak
Printed Notary Name
Commission No.: EE 144544
My Commission Expires: 11/08/15



Approved as to form by Florida Department
Of Environmental Protection, Office of
General Counsel:

Toni Sturtevant
Toni Sturtevant, Sr. Asst. General Counsel
Office of General Counsel

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

By: *Jorge Caspary*
JORGE CASPARY,
Director

Dept. of Environmental Protection
Division of Waste Management
2800 Blairstone Road
Tallahassee, FL 32399-2400

Signed, sealed, and delivered in
in the presence of:

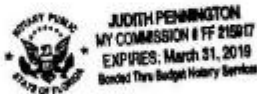
Melody Johnson
Witness Signature
Melody Johnson
Printed Name
4/14/15
Date

Steve Shoras
Witness Signature
Steve Shoras
Printed Name
04/14/2015
Date

STATE OF FLORIDA
COUNTY OF LEON

On this 14 day of APRIL, 2015, before me, the undersigned, a Notary Public
in and for the State of Florida, duly commissioned and sworn, personally appeared JORGE
CASPARY, known to be the Division Director, Division of Waste Management of the Florida
Department of Environmental Protection, the State Agency that executed the foregoing
instrument, and acknowledged the said instrument to be the free and voluntary act and deed of
said Agency, for the uses and purposes therein mentioned, and on oath stated that he is
authorized to execute said document.

Witness my hand and official seal hereto affixed the day and year written above.



Judith Pennington
Notary Public in and for the
State of Florida

Attachments:

Exhibit A	Legal Description of the Property
Exhibit B	Well Restriction Area
Composite Exhibit C	Survey Map, Existing Stormwater Facilities
Exhibit D	Legal Description of the Landfill Vault
Exhibit E	Existing Liens and Encumbrances on the Property

EXHIBIT A

Legal Description of the Property

PARCEL A:

A PORTION OF SECTION 26 & 35, TOWNSHIP 39 SOUTH, RANGE 38 EAST, MARTIN COUNTY, FLORIDA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCE AT A POINT 100.00 FEET SOUTHWESTERLY OF, AS MEASURED AT RIGHT ANGLES TO, THE CENTERLINE OF THE SEABOARD COAST LINE RAILROAD COMPANY MAIN TRACK, SAID POINT BEING ON THE EAST LINE OF SAID SECTION 35; THENCE RUN NORTHWESTERLY ALONG A LINE PARALLEL TO AND 100.00 FEET SOUTHWESTERLY OF, AS MEASURED AT RIGHT ANGLES TO, THE AFORESAID CENTERLINE OF THE MAIN TRACK FOR 900.00 FEET TO THE POINT OF BEGINNING OF THE PARCEL OF LAND HEREINAFTER DESCRIBED; THENCE CONTINUE NORTHWESTERLY ALONG THE LAST DESCRIBED COURSE FOR 3300.00 FEET; THENCE RUN SOUTHWESTERLY AT RIGHT ANGLES TO THE LAST DESCRIBED COURSE FOR 700.00 FEET; THENCE RUN SOUTHEASTERLY AT RIGHT ANGLES TO THE LAST DESCRIBED COURSE AND 800.00 FEET SOUTHWESTERLY OF, AS MEASURED AT RIGHT ANGLES TO, THE CENTERLINE OF THE MAIN TRACK FOR 3300.00 FEET; THENCE RUN NORTHEASTERLY AT RIGHT ANGLES TO THE LAST DESCRIBED COURSE FOR 700.00 FEET TO THE POINT OF BEGINNING, ALL LYING AND BEING IN MARTIN COUNTY, FLORIDA.

CONTAINS: 2,310,000 SQUARE FEET OR 53.03 ACRES MORE OR LESS.

AND

PARCEL B:

A PORTION OF SECTION 35, TOWNSHIP 39 SOUTH, RANGE 38 EAST, MARTIN COUNTY, FLORIDA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCE AT A POINT 100.00 FEET SOUTHWESTERLY OF, AS MEASURED AT RIGHT ANGLES TO, THE CENTERLINE OF THE SEABOARD COAST LINE RAILROAD COMPANY MAIN TRACK, SAID POINT BEING ON THE EAST LINE OF SAID SECTION 35; THENCE RUN NORTHWESTERLY ALONG A LINE PARALLEL

TO AND 100.00 FEET SOUTHWESTERLY OF, AS MEASURED AT RIGHT ANGLES TO, THE AFORESAID CENTERLINE OF THE MAIN TRACK FOR 900.00 FEET; THENCE RUN SOUTHWESTERLY AT RIGHT ANGLES TO THE LAST DESCRIBED COURSE FOR 700.00 FEET TO THE POINT OF BEGINNING OF THE PARCEL OF LAND HEREINAFTER DESCRIBED; THENCE CONTINUE SOUTHWESTERLY ALONG THE LAST DESCRIBED COURSE FOR 1300.00 FEET; THENCE RUN NORTHWESTERLY AT RIGHT ANGLES TO THE LAST DESCRIBED COURSE AND 2100.00 FEET SOUTHWESTERLY OF THE AFORESAID CENTERLINE OF THE MAIN TRACK FOR 3300.00 FEET; THENCE RUN NORTHEASTERLY AT RIGHT ANGLES TO THE LAST DESCRIBED COURSE FOR 1300.00 FEET; THENCE RUN SOUTHEASTERLY AT RIGHT ANGLES TO THE LAST DESCRIBED COURSE AND 800.00 FEET SOUTHWESTERLY OF THE AFORESAID CENTERLINE OF THE MAIN TRACK FOR 3300.00 FEET TO THE POINT OF BEGINNING, ALL LYING AND BEING IN MARTIN COUNTY, FLORIDA.

CONTAINS: 4,290,000 SQUARE FEET OR 98.48 ACRES MORE OR LESS

LESS AND EXCEPT

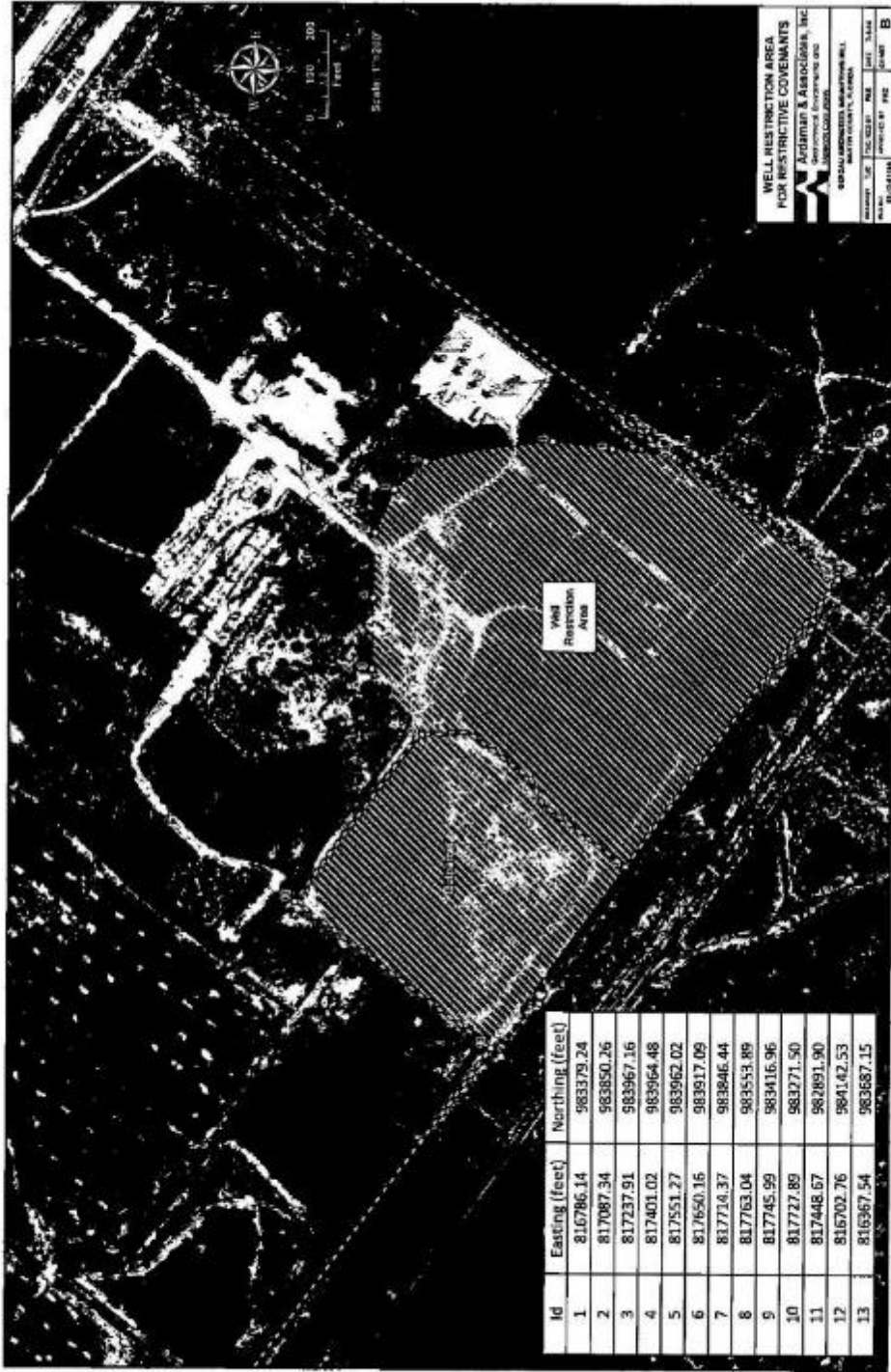
A PORTION OF SECTION 35, TOWNSHIP 39 SOUTH, RANGE 38 EAST, MARTIN COUNTY, FLORIDA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCE AT A POINT 100.00 FEET SOUTHWESTERLY OF, AS MEASURED AT RIGHT ANGLES TO, THE CENTERLINE OF, THE SEABOARD COAST LINE RAILROAD COMPANY MAIN TRACK, SAID POINT BEING ON THE EAST LINE OF SAID SECTION 35; THENCE RUN NORTH 53°39'47" WEST ALONG A LINE PARALLEL TO AND 100.00 FEET SOUTHWESTERLY OF, AS MEASURED AT RIGHT ANGLES TO, THE AFORESAID CENTERLINE OF THE MAIN TRACK A DISTANCE OF 902.85 FEET TO THE NORTHEAST CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324 PAGE 2220, PUBLIC RECORDS OF MARTIN COUNTY, FLORIDA; THENCE SOUTH 36°20'13" WEST ALONG THE EAST LINE OF SAID LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2220, A DISTANCE OF 700.00 FEET TO THE SOUTHEAST CORNER OF SAID LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2220, SAID POINT ALSO BEING THE NORTHEAST CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2207; THENCE CONTINUE SOUTH 36°20'13" WEST ALONG THE EAST LINE OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2207, A DISTANCE OF 1300.00 FEET; THENCE NORTH 53°39'47" WEST, ALONG THE SOUTH LINE OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2207, SAID LINE ALSO BEING 2100.00 FEET SOUTHWESTERLY OF AND PARALLEL TO THE AFORESAID CENTERLINE OF THE MAIN TRACK, A DISTANCE OF 822.46 FEET TO THE POINT

OF BEGINNING; THENCE CONTINUE ALONG THE SOUTH LINE OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2207, NORTH 53°39'47" WEST, A DISTANCE OF 519.65 FEET; THENCE DEPARTING SAID SOUTH LINE, NORTH 36°21'30" EAST, A DISTANCE OF 565.46 FEET; THENCE SOUTH 53°38'32" EAST, A DISTANCE OF 476.88 FEET; THENCE SOUTH 03°08'15" EAST, A DISTANCE OF 115.22 FEET; THENCE SOUTH 36°20'13" WEST, A DISTANCE OF 178.5 FEET; THENCE SOUTH 64°17'16" WEST, A DISTANCE OF 65.41 FEET; THENCE SOUTH 36°20'41" WEST, A DISTANCE OF 240.08 FEET, TO THE POINT OF BEGINNING.

CONTAINING 6.88 ACRES, MORE OR LESS.

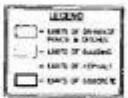
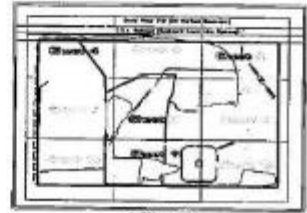
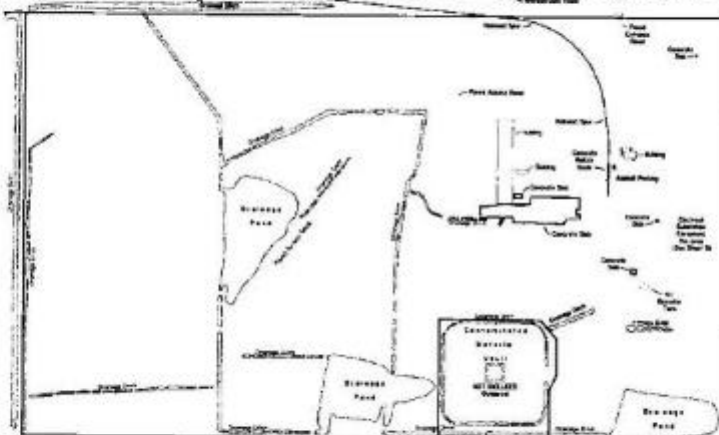
EXHIBIT B
Well Restriction Area



COMPOSITE EXHIBIT C
Survey Map, Existing Stormwater Facilities

Site Improvements

State Road 710 (SW Marfield Boulevard)
 CSX Railroad (Seaboard Coast Line Railroad)



<p>ECOY INCORPORATED PROFESSIONAL ENGINEER AND SURVEYOR STATE OF FLORIDA LICENSE NO. 12500 1000 W. 10th Street, Suite 100 Ft. Lauderdale, FL 33304 Phone: (305) 555-1111</p>	STORAGE & TREATMENT AREA FOR FLORIDA NATURAL GAS STORAGE CO., LTD. MARION COUNTY, FLORIDA	
	Date: 11-20-01 Drawn by: JMT	Title: 11-20-01 Checked by: JMT

CFN# 2510677 OFFICIAL RECORDS BK 2779 PG 425 PAGE 19 OF 22

K-22

EXHIBIT D

Legal Description of the Landfill Vault

A PORTION OF SECTION 35, TOWNSHIP 39 SOUTH, RANGE 38 EAST, MARTIN COUNTY, FLORIDA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCE AT A POINT 100.00 FEET SOUTHWESTERLY OF, AS MEASURED AT RIGHT ANGLES TO, THE CENTERLINE OF, THE SEABOARD COAST LINE RAILROAD COMPANY MAIN TRACK, SAID POINT BEING ON THE EAST LINE OF SAID SECTION 35; THENCE RUN NORTH 53°39'47" WEST ALONG A LINE PARALLEL TO AND 100.00 FEET SOUTHWESTERLY OF, AS MEASURED AT RIGHT ANGLES TO, THE AFORESAID CENTERLINE OF THE MAIN TRACK A DISTANCE OF 902.85 FEET TO THE NORTHEAST CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324 PAGE 2220, PUBLIC RECORDS OF MARTIN COUNTY, FLORIDA; THENCE SOUTH 36°20'13" WEST ALONG THE EAST LINE OF SAID LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2220, A DISTANCE OF 700.00 FEET TO THE SOUTHEAST CORNER OF SAID LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2220, SAID POINT ALSO BEING THE NORTHEAST CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2207; THENCE CONTINUE SOUTH 36°20'13" WEST ALONG THE EAST LINE OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2207, A DISTANCE OF 1300.00 FEET; THENCE NORTH 53°39'47" WEST, ALONG THE SOUTH LINE OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2207, SAID LINE ALSO BEING 2100.00 FEET SOUTHWESTERLY OF AND PARALLEL TO THE AFORESAID CENTERLINE OF THE MAIN TRACK, A DISTANCE OF 822.46 FEET TO THE POINT OF BEGINNING; THENCE CONTINUE ALONG THE SOUTH LINE OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 324, PAGE 2207, NORTH 53°39'47" WEST, A DISTANCE OF 519.65 FEET; THENCE DEPARTING SAID SOUTH LINE, NORTH 36°21'30" EAST, A DISTANCE OF 565.46 FEET; THENCE SOUTH 53°38'32" EAST, A DISTANCE OF 476.88 FEET; THENCE SOUTH 03°08'15" EAST, A DISTANCE OF 115.22 FEET; THENCE SOUTH 36°20'13" WEST, A DISTANCE OF 178.5 FEET; THENCE SOUTH 64°17'16" WEST, A DISTANCE OF 65.41 FEET; THENCE SOUTH 36°20'41" WEST, A DISTANCE OF 240.08 FEET, TO THE POINT OF BEGINNING.

CONTAINING 6.88 ACRES, MORE OR LESS.

EXHIBIT E


Existing Liens and Encumbrances on the Property

1. Real estate taxes and assessments for the year 2015 and thereafter.
2. Zoning and other governmental land use restrictions, limitations, and prohibitions.
3. Ordinance No. 368, recorded in Official Records Book 840, page 1389; Resolution No. 97-8.13, recorded in Official Records Book 1260, page 129; Resolution No. 97-8.12, recorded in Official Records Book 1260, page 143; and Resolution No. 02-9.43, recorded in Official Records Book 1685, page 40, all of the public records of Martin County, Florida.
4. Declaration of Covenants, Conditions and Restrictions, recorded in Official Records Book 873, page 1016, of the public records of Martin County, Florida.
5. Easement in favor of Florida Power & Light Company, recorded in Official Records Book 977, page 2234, of the public records of Martin County, Florida.
6. Access Easement Agreement by and between Florida Steel Corporation, a Florida corporation and Florida Power & Light Company, a Florida corporation, recorded in Official Records Book 977, page 2239, of the public records of Martin County, Florida.
7. Notice to Subsequent Purchasers of Right-of-Way Easement in favor of Florida Power & Light Company, recorded in Official Records Book 977, page 2248, of the public records of Martin County, Florida.
8. Notice of Recordation of Certified Copy of Consent Degree and Notice of Obligation to Provide Access, recorded in Official Records Book 1023, page 550, of the public records of Martin County, Florida.
9. Notice of Recordation of Certified Copy of Consent Degree and Notice of Obligation to Provide Access, recorded in Official Records Book 1116, page 2250, of the public records of Martin County, Florida.
10. Option Agreement by and between Gerdau Ameristeel US Inc., a Florida corporation and Floridian Natural Gas Storage Company, LLC, a Delaware limited liability company, a Memorandum of Option Agreement being recorded in Official Records Book 2196, page 1830, as amended by: Amended and Restated Memorandum of Option Agreement, recorded in Official Records Book 2380, page 2089; Second Amended and Restated Memorandum of Option Agreement, recorded in Official Records Book 2519, page 2827; Third Amended

and Restated Memorandum of Option Agreement, recorded in Official Records Book 2653, page 935; and Third Amendment to Real Property Option Agreement, recorded in Official Records Book 2653, page 941, all of the public records of Martin County, Florida.

11. Resolution Number 08-5.1 (Regarding Master/Final Site Plan Approval for Floridian Natural Gas Storage Company, LLC., with a Certificate of Public Facilities Reservation) recorded in Official Records Book 2340, page 301, as affected by Martin County, Florida Development Order Change Regarding a Timetable Extension for Floridian Natural Gas Storage Company, LLC., recorded in Official Records Book 2389, page 2277, both of the public records of Martin County, Florida.
12. Unity of Title, recorded in Official Records Book 2350, page 98, of the public records of Martin County, Florida.
13. Receipt of Notification, recorded in Official Records Book 2574, page 857, of the public records of Martin County, Florida.
14. Notice of Department of the Army Permit, recorded in Official Records Book 2619, page 2109, of the public records of Martin County, Florida.

Grant of Easement for Downgradient Property


INSTR # 2225139
OR BK 02468 PG 0924
Pg 0924 - 9301 (7pgs)
RECORDED 08/03/2010 10:50:11 AM
MARSHA EWING
CLERK OF MARTIN COUNTY FLORIDA
DEED DOC TAX 0.76
RECORDED BY T Copus (asst mgr)

THIS INSTRUMENT PREPARED BY
AND IS TO BE RETURNED TO:

Michael L. Dale, Esq.
2616 SE Willoughby Blvd.
Stuart, Florida 34994
Courthouse Box 7K

Grantee #1 S.S. No. _____
Grantee #2 S.S. No. _____
Parcel Identification No.
33-39-38-000-000-0010-2

GRANT OF EASEMENT

THIS INDENTURE, made this 27 day of July, 2010, between, **LINDA M. POST and DAVID A. RALICKI, Individually and as Successor Trustees of the ROBERT M. POST, JR., MARITAL TRUST, under agreement dated August 6, 1999**, whose post office address is 1235 SE Indian Street, Suite 102, Stuart, Florida 34994, **Grantor**, and, **INDIANTOWN COMPANY, INC., a Florida Corporation**, whose post office address is P. O. Box 397, Indiantown, Florida 34956, **Grantee**;

WHEREAS, the Grantor is seized in fee simple and in possession of the lands described herein;

WHEREAS, Grantor has agreed in consideration of the sum of Ten xx/100 (\$10.00) Dollars and other good and valuable consideration to grant to Grantee, and by all other persons claiming by, through or under Grantor, or Grantor's predecessors in title, or heirs, assigns or legal representatives by virtue of any deeds of conveyance to the land described in the attached exhibit, a non-exclusive perpetual easement over the land described in the attached exhibit, for the purposes and in the manner expressed below;

NOW, THIS INDENTURE WITNESSETH:

That, in pursuance of this agreement and in consideration of the sum of Ten xx/100 (\$10.00) Dollars and other good and valuable consideration, receipt of which is acknowledged, Grantor grants unto Grantee, its successors and assigns, and to all others likely situated as above described;

Full and free right of Grantee, its successors and assigns, and licensees, in common with all persons having the like right, at all times hereafter, for all purposes connected with the use, maintenance, replacement, extension, or improvement of the water and sewage mains and appurtenances, water and sewage service lines, sewage pumping stations, or other improvements for the purposes of providing water and sewage service and to pass and reposs over the described property for such purposes.

The property which is the subject of this non-exclusive perpetual easement is described as follows:

SEE EXHIBIT "A"

SUBJECT PROPERTY IS COMMERCIAL AND NON-HOMESTEAD.

TO HAVE AND TO HOLD the easement hereby granted unto Grantee, its successors and assigns and those likely situated as described above.

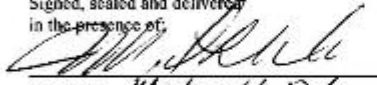
Page -1-

It is understood and the easement is given upon the express understanding and condition that it may be used by Grantor, and Grantor's successors and assigns in conjunction with the use of Grantee, its successors and assigns and others likely situated, provided Grantee's uses for the aforescribed purposes are not disturbed or interfered with in anyway. Grantor shall not construct any building, permanent structure or obstruction over or on the easement as to interfere with the Grantee's use or enjoyment of or access to the easement, provided however, that none of the rights granted herein to Grantee shall prohibit Grantor from the use or enjoyment of the easement for the purposes of providing ingress and egress to any adjoining property of Grantor. Grantor shall not adopt or place of record any restrictions or covenants on the easement that shall unreasonably interfere with Grantee's use and enjoyment of the easement.

Although Grantee has constructed facilities located within the easement area or will do so in the future, it agreed that from and after the date hereof, the Grantee and Grantee's successors and assigns will in no way will be bound to improve, maintain or construct water or sewer service lines or sewage pumping stations or other improvements for the purpose of providing water or sewer service to the property or to keep them in repair; nor does Grantor, or Grantor's heirs and assigns assume any liability or responsibility to Grantee, its successors and assigns, or any person using the land by invitation, expressed or implied, or by reason of any business conducted with Grantee, its successors and assigns, or otherwise.

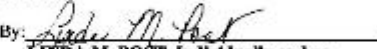
IN WITNESS WHEREOF, Grantor has hereunto set Grantor's hand and seal the day and year first written above.

Signed, sealed and delivered in the presence of:


 Printed Name: Michael L. Dale


 Printed Name: Pamela D. Davidge

ROBERT M. POST, JR., REVOCABLE TRUST

By: 
LINDA M. POST, Individually and as Co-Trustee

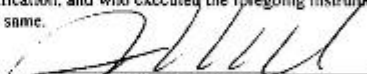
By: 
DAVID A. RALICKI, Individually and as Co-Trustee

STATE OF FLORIDA
 COUNTY OF MARTIN

I HEREBY CERTIFY that on this 29th day of July, 2010 before me, personally appeared, LINDA M. POST and DAVID A. RALICKI, who are personally known to me or have produced _____ as identification, and who executed the foregoing instrument and acknowledged before me that they executed the same.

(Official Seal)




 Notary Public - State of Florida
 Printed Name: _____
 My commission expires: _____

Page -2-

Signed, sealed and delivered
in the presence of:

Cheryl Baker
Printed Name: CHERYL BAKER

Iris P. Wall
IRIS P. WALL

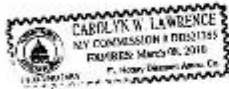
Carolyn W. Lawrence
Printed Name: CAROLYN W. LAWRENCE

STATE OF FLORIDA

COUNTY OF MARTIN

I HEREBY CERTIFY that on this 12th day of August, 2009 before me, personally appeared, IRIS P. WALL, who is personally known to me or has produced _____ as identification, and who executed the foregoing instrument and acknowledged before me that they executed the same.

(Official Seal)



Carolyn W. Lawrence
Notary Public - State of Florida
Printed Name: CAROLYN W. LAWRENCE
My commission expires:

EXHIBIT 'A'

BEING known as a portion of land lying in Sections 26, 27, 34, 35 and 36, Township 39 South, Range 38 East, Martin County, Florida, and being more particularly described as follows:

COMMENCING at the southeast corner of Section 36; thence S 89°53'30" W along the south line of said Section 36 a distance of 2,763.90 feet to the POINT AND PLACE OF BEGINNING; thence S 89°53'30" W along said south Section line a distance of 2,585.35 feet to the southwest corner of said Section 36 and a two inch iron pipe found; thence S 89°39'12" W along the south line of Section 35 a distance of 2,660.13 feet to a point; thence N 00°33'01" E along lands of or formerly of J.A. Slay a distance of 669.37 feet to a point; thence S 89°41'17" W along lands of or formerly of J.A. Slay a distance of 1,330.50 feet to a point; thence S 00°30'43" W along lands of or formerly of J.A. Slay a distance of 535.16 feet to a point; thence S 48°23'07" W a distance of 204.65 feet to a point on the south line of Section 35; thence S 89°39'13" W along said south line a distance of 1,178.27 feet to a point, and the southeast corner of Section 34; thence S 89°39'13" W along the south line of Section 34 a distance of 2,660.13 feet to a point; thence N 00°14'47" E along lands of or formerly of Alcoma Groves a distance of 1,334.90 feet to a point; thence S 89°51'31" W along lands of or formerly of Alcoma Groves a distance of 1,078.90 feet to a point; thence N 36°20'45" E a distance of 6,271.77 feet to a point; thence S 53°39'15" E a distance of 100.00 feet to a point; thence S 36°20'45" W along lands of or formerly of Caulkins Grove a distance of 1,300.00 feet to a point; thence S 35°39'15" E a distance of 5,179.73 feet to a point and a one inch iron pipe found; thence N 36°20'45" E along lands of or formerly of Florida Steel Corporation a distance of 1,300.00 feet to a point; thence S 53°39'15" E a distance of 2,330.98 feet to a point; thence S 36°20'45" W a distance of 400.00 feet to a point; thence S 53°39'15" E a distance of 2,518.68 feet to the POINT AND PLACE OF BEGINNING; containing 721.3799 acres, more or less, according to survey and plat thereof prepared by Steven J. Brown, Professional Land Surveyor, Registration No. 4049, said plat being dated September 20, 1988, last revised December 12, 1988, incorporated herein by reference.

Less all lands lying within Parcels I and II as follows:

Parcel I:

A portion of Sections 34 and 35, Township 39 South, Range 38 East, more particularly described as follows:

Begin at the Southeast corner of said Section 34, having a grid coordinate of X=657,746.240, Y=-980,541.940 based on the NAD 27 Datum of the Florida State Plane Coordinate System East Zone; thence S 89 degrees 40 minutes 53 seconds W, along the South boundary of said Section 34, a distance of 200.00 feet; thence N 01 degrees 19 minutes 07 seconds W, 50.01 feet to a line 50.00 feet North of and parallel with said Section line; thence S 89 degrees 40 minutes 53 seconds W, along said parallel line, 2458.88 feet to a point on the East boundary of the Southwest one-quarter (SW 1/4) of said Section 34; thence N 00 degrees 16 minutes 22 seconds E, along said East boundary, 200.03 feet; thence N 87 degrees 54 minutes 06 seconds E, 2446.31 feet; thence N 34 degrees 07 minutes 50 seconds E, 1931.82 feet; thence N 08 degrees 45 minutes 38 seconds E, 639.86 feet; thence N 36 degrees 33 minutes 49 seconds E, 356.25 feet; thence N 72 degrees 24 minutes 17 seconds E, 124.47 feet; thence N 24 degrees 07 minutes 50 seconds E, 336.02 feet; thence N 37 degrees 16 minutes 27 Seconds E, 440.07 feet to a point on the Southerly boundary of that property described in Official Records Book 324, Page 2220, of the Public Records of Martin County, Florida; thence S 53 degrees 30 minutes 15 seconds E, along said southerly boundary 200.02 feet; thence S 37 degrees 16 minutes 27 seconds W, 419.75 feet; thence S 24 degrees 07 minutes 50 seconds W, 3293.70 feet; thence S 65 degrees 52 minutes 10 seconds E, 37.69 feet to a point on the East boundary of said Section 34; thence S 00 degrees 28 minutes 26 seconds W, along said East boundary 226.63 feet to the Point of Beginning.

Said lands lying in Martin County, Florida.

Parcel II:

All of the Plat of INDIANTOWN COGENERATION PROJECT P.U.D., as described in the Plat thereof recorded in Plat Book 13, Page 13, of the Public Records of Martin County, Florida.

ALSO DESCRIBED AS FOLLOWS:

DESCRIPTION: TRACTS "A" AND "C"

A PARCEL OF LAND LYING IN SECTIONS 26, 27, 34 AND 35, TOWNSHIP 39 SOUTH, RANGE 38 EAST, MARTIN COUNTY, FLORIDA. SAID PARCEL, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

FROM THE SOUTHWEST CORNER OF SAID SECTION 35, BEAR NORTH 00°28'26" EAST ALONG THE WEST LINE OF SAID SECTION 35, A DISTANCE OF 896.01 FEET TO THE POINT OF BEGINNING OF THE HEREIN DESCRIBED PARCEL OF LAND; THENCE PROCEED NORTH 66°37'54" WEST, A DISTANCE OF 581.37 FEET; THENCE SOUTH 58°17'40" EAST, A DISTANCE OF 562.29 FEET; THENCE SOUTH 65°16'27" EAST, A DISTANCE OF 52.64 FEET TO A POINT FOR FUTURE REFERENCE "A"; THENCE SOUTH 24°07'50" WEST, A DISTANCE OF 80.00 FEET; THENCE NORTH 65°16'27" WEST, A DISTANCE OF 58.35 FEET; THENCE NORTH 58°17'40" WEST, A DISTANCE OF 1288.18 FEET; THENCE NORTH 76°44'21" WEST, A DISTANCE OF 284.00 FEET; THENCE NORTH 58°17'40" WEST, A DISTANCE OF 755.66 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE TO THE EAST, HAVING A RADIUS OF 640.00 FEET; THENCE NORTHERLY ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 28°57'18", A DISTANCE OF 323.43 FEET; THENCE NORTH 58°17'40" WEST, A DISTANCE OF 16.09 FEET TO THE POINT OF CURVATURE OF A CURVE CONCAVE TO THE EAST, HAVING A RADIUS OF 270.00 FEET; THENCE NORTHERLY ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 94°38'25", A DISTANCE OF 445.98 FEET TO THE POINT OF TANGENCY; THENCE NORTH 36°20'45" EAST, A DISTANCE OF 27.14 FEET TO A POINT ON A CURVE CONCAVE TO THE EAST, HAVING A RADIUS OF 640.00 FEET WHOSE CENTER BEARS SOUTH 80°25'31" EAST; THENCE NORTHERLY ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 26°46'16", A DISTANCE OF 299.03 FEET; THENCE NORTH 53°39'15" WEST, A DISTANCE OF 1.40 FEET; THENCE NORTH 36°20'45" EAST, A DISTANCE OF 2014.70 FEET TO A POINT ON THE WEST RIGHT-OF-WAY LINE OF THE CSX TRANSPORTATION INC. RAILROAD; THENCE SOUTH 53°39'15" EAST ALONG SAID RAILROAD RIGHT-OF-WAY, A DISTANCE OF 100.00 FEET; THENCE SOUTH 36°20'45" WEST, A DISTANCE OF 2000.00 FEET; THENCE SOUTH 53°39'15" EAST, A DISTANCE OF 2624.26 FEET; THENCE S 37°16'27" WEST, A DISTANCE OF 440.07 FEET; THENCE SOUTH 24°07'50" WEST, A DISTANCE OF 336.02 FEET; THENCE S 72°24'17" WEST, A DISTANCE OF 124.47 FEET; THENCE SOUTH 36°33'49" WEST, A DISTANCE OF 356.25 FEET; THENCE SOUTH 08°45'38" WEST, A DISTANCE OF 639.86 FEET; THENCE SOUTH 24°07'50" WEST, A DISTANCE OF 1325.00 FEET; THENCE NORTH 66°37'54" WEST, A DISTANCE OF 28.70 FEET TO THE POINT OF BEGINNING OF THE HEREIN DESCRIBED PARCEL OF LAND.

TOGETHER WITH THE FOLLOWING DESCRIBED PARCEL OF LAND:

COMMENCE AT THE AFOREMENTIONED REFERENCE POINT "A"; THENCE PROCEED SOUTH 65°16'27" EAST, A DISTANCE OF 200.01 FEET TO THE POINT OF BEGINNING OF THE HEREIN DESCRIBED PARCEL OF LAND; THENCE CONTINUE SOUTH 65°16'27" EAST, A DISTANCE OF 943.90 FEET; THENCE SOUTH 77°06'28" EAST, A DISTANCE OF 282.33 FEET MORE OR LESS TO A POINT IN THE NORTHWEST LINE OF S.W. FARM ROAD AS NOW LAID OUT AND IN USE; THENCE SOUTH 48°23'07" WEST ALONG SAID NORTHWEST LINE, A DISTANCE OF 234.15 FEET TO THE POINT OF CURVE OF A CURVE CONCAVE TO THE WEST, HAVING A RADIUS OF 70.00 FEET, WHOSE CENTER BEARS NORTH 41°36'53" WEST; THENCE NORTHERLY ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 125°29'35", A DISTANCE OF 153.32 FEET TO THE POINT OF TANGENCY; THENCE NORTH 77°06'28" WEST, A DISTANCE OF 97.68 FEET; THENCE NORTH 65°16'27" WEST, A DISTANCE OF 951.36 FEET; THENCE NORTH 24°07'50" EAST, A DISTANCE OF 80.00 FEET TO THE POINT OF BEGINNING OF THE HEREIN DESCRIBED PARCEL OF LAND.

SAID PARCELS TOGETHER CONTAINING 240.40 ACRES, MORE OR LESS.

Together with all of Grantors' right, title and interest in and to that certain Easement, more particularly described in Official Records Book 794, Page 368, of the Public Records of Martin County, Florida, over the following described parcel:

All that certain land being known as a portion of Sections 26 and 27, Township 39 South, Range 38 East, Martin County, Florida, more particularly described as follows:

COMMENCING at the southeast corner of Section 26; Township 39 South, Range 38 East; thence S 89°53'30" W along the south line of Section 26 a distance of 912.00 feet to a point of intersection with the west right of way of CSX Transportation; thence N 53°39'15" W along said right of way a distance of 11,518.45 feet to the PLACE OF BEGINNING; thence continuing along said west right of way N 53°39'15" W a distance of 100.00 feet; thence N 36°20'45" E a distance of 200.00 feet to a point on the west line of State Road 710; thence S 53°39'15" E along said line of State Road 710 a distance of 100.00 feet to a point; thence S 36°20'45" W a distance of 200.00 feet to the POINT OF BEGINNING; containing 0.459 of an acre, more or less.

**LEGAL DESCRIPTION
FOR
25' UTILITY EASEMENT**

A UTILITY EASEMENT BEING PORTIONS OF THE SOUTH 25 FEET OF SECTIONS 35 AND 36, TOWNSHIP 39 SOUTH, RANGE 38 EAST, AND SECTION 1, TOWNSHIP 40 SOUTH, RANGE 38 EAST, MARTIN COUNTY FLORIDA, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: BEGINNING AT THE THE SOUTHEAST CORNER OF SAID SECTION 35, (SAID CORNER ALSO BEING THE SOUTHWEST CORNER OF SAID SECTION 36) TOWNSHIP 39 SOUTH, RANGE 38 EAST; THENCE PROCEED S89°38'44"W ALONG THE SOUTH LINE OF SECTION 35, A DISTANCE OF 2624.03 FEET; THENCE DEPARTING SAID SOUTH LINE OF SECTION 35, N00°21'16"W TO THE INTERSECTION WITH A LINE 25 FEET NORTH OF AND PARALLEL WITH SAID SOUTH LINE OF SECTION 35; THENCE PROCEED ALONG SAID PARALLEL LINE N89°38'44"E 2624.14 FEET TO A POINT ON THE EAST LINE OF SAID SECTION 35, (ALSO THE WEST LINE OF SECTION 36); THENCE PROCEED N89°53'01"E ALONG A LINE 25 FEET NORTH OF AND PARALLEL TO THE SOUTH LINE OF SECTION 36, TOWNSHIP 39 SOUTH, RANGE 38 EAST, FOR A DISTANCE OF 2593.59 FEET; THENCE PROCEED S53°39'44"E A DISTANCE OF 989.54 FEET ALONG A LINE EXTENDING INTO SAID SECTION 1, TOWNSHIP 40 SOUTH RANGE 38 EAST, TO THE INTERSECTION OF SAID LINE WITH THE WESTERLY BOUNDARY LINE OF BOOKER PARK; THENCE PROCEED ALONG SAID WESTERLY BOUNDARY LINE S36°20'16"W A DISTANCE OF 25.00 FEET TO A POINT ON THE NORTHERLY BOUNDARY LINE OF NEW HOPE, A PLATTED SUBDIVISION RECORDED IN PLAT BOOK 9, PAGE 10, PUBLIC RECORDS OF MARTIN COUNTY, FLORIDA; THENCE PROCEED N53°39'44"W A DISTANCE OF 981.31 FEET ALONG SAID NORTHERLY BOUNDARY LINE TO THE INTERSECTION WITH THE SOUTH LINE OF SECTION 36; THENCE PROCEED S89°53'01"W ALONG THE SOUTH LINE OF SAID SECTION 36, A DISTANCE OF 2585.36 FEET TO THE SOUTHEAST CORNER OF SAID SECTION 36, TOWNSHIP 39 SOUTH, RANGE 38 EAST AND THE POINT AND PLACE OF BEGINNING.
SAID EASEMENT CONTAINING 150010.47 SQUARE FEET OR 3.44 ACRES MORE OR LESS.

NOTES:

1. THIS SKETCH OF LEGAL DESCRIPTION DOES NOT REPRESENT A BOUNDARY SURVEY.
2. THE BEARING BASE OF THIS SKETCH OF LEGAL DESCRIPTION IS S89°38'44"W ALONG THE SOUTH LINE OF SECTION 35/39/38..
3. BEARINGS AND COORDINATES SHOWN HEREON ARE STATE PLANE AND ARE TAKEN FROM GPS LOCATION.

SURVEYORS CERTIFICATION:

I HEREBY CERTIFY THAT THE "SKETCH TO ACCOMPANY LEGAL DESCRIPTION" WAS PREPARED UNDER MY RESPONSIBLE CHARGE AND MEETS THE MINIMUM TECHNICAL STANDARDS AS SET FORTH BY THE FLORIDA BOARD OF PROFESSIONAL LAND SURVEYORS AND MAPPERS IN CHAPTER 61G17-6, FLORIDA STATUTES, AND THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF. NOT VALID WITHOUT THE SIGNATURE AND THE ORIGINAL RAISED SEAL OF A FLORIDA LICENSED SURVEYOR AND MAPPER.

ROBERT BLOOMSTER JR.
PROFESSIONAL LAND SURVEYOR
NO. 4134 STATE OF FLORIDA

BLOOMSTER PROFESSIONAL LAND SURVEYORS, INC. <small>FLORIDA L.S. # 8114</small>
<small>791 NORTHEAST DIKE HIGHWAY JENSEN BEACH, FLORIDA 34957 PHONE 772-334-0888</small>

<small>SHEET 1 OF 2</small>
<small>SCALE: 1" = 400'</small>
<small>DATE: 05/03/24</small>
<small>T.S. NORTH</small>
<small>JOB NO. 20240001</small>
<small>REVISED</small>

SKETCH TO ACCOMPANY LEGAL DESCRIPTION
<small>PREPARED FOR: THE INDIANTOWN COMPANIES</small>
<small>SITE LOCATED: INDIANTOWN, MARTIN COUNTY, FLORIDA</small>

NOT VALID WITHOUT SHEET 2 OF 2

SKETCH OF DESCRIPTION
FOR
25' UTILITY EASEMENT

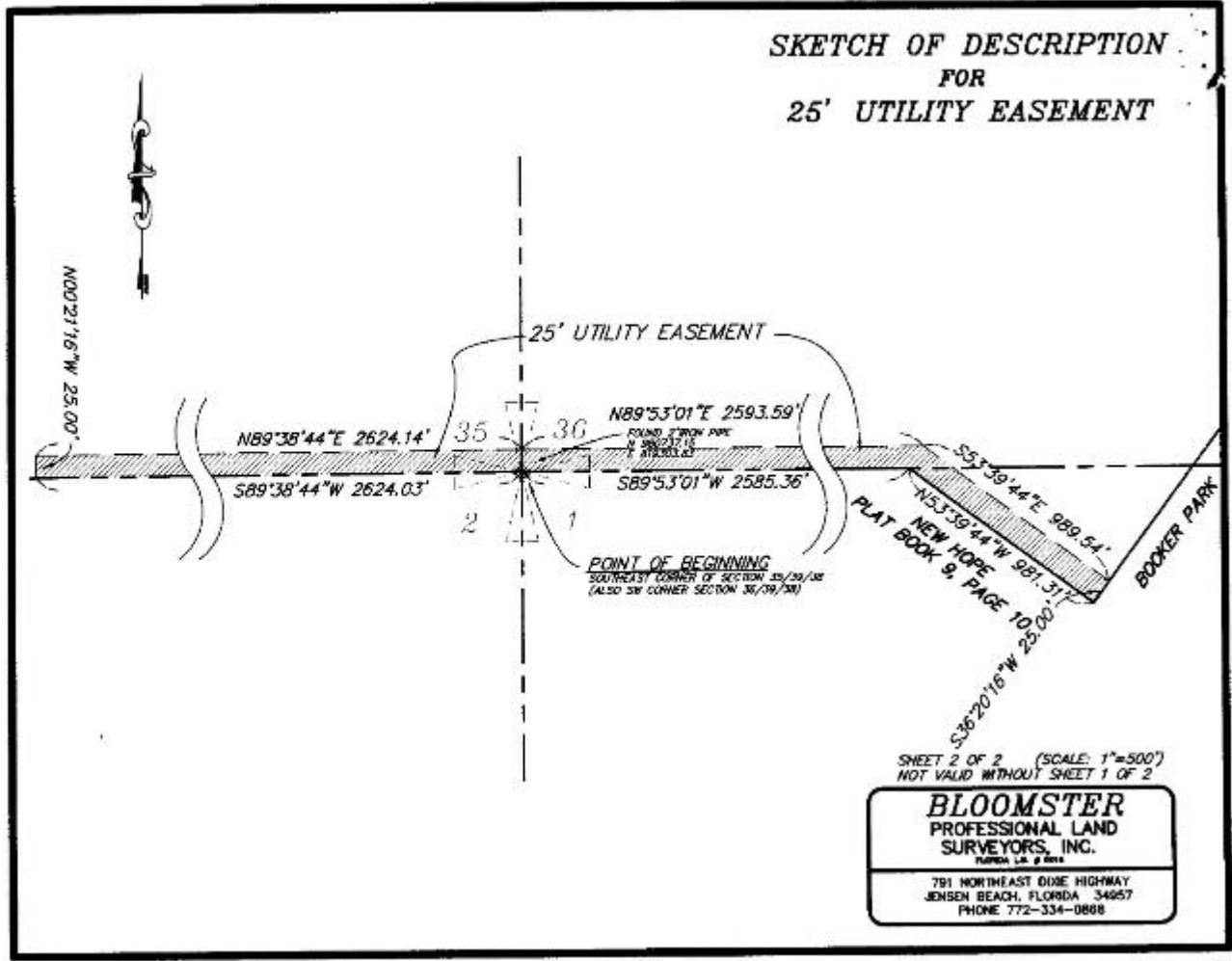


EXHIBIT G – REQUIRED WATER CONNECTION

Martin County Land Development Code

Sec. 4.226. - Required system connections. 

4.226.A.

All new development within the primary urban service district requiring site planning or platting shall connect to a regional potable water system if a water line with sufficient available capacity exists within one-quarter mile of the development as accessed via public easements or rights-of-way, and the regional potable water system has available capacity.

4.226.B.

Developments required to extend lines to connect to a regional potable water system shall do so in accordance with the requirements of that regional potable water system. For County-owned and/or operated systems, the routing and size of the main extension shall be in accordance with the County's master pipe network plan to be adopted by resolution. Where urban land use designations require future extension of water mains, the mains shall be required to be extended the full length of the right-of-way or easement which is adjacent to the property.

4.226.C.

All residential and nonresidential properties obtaining building permits after adoption of this subdivision [Ordinance No. 454, adopted February 14, 1995] must connect to a regional potable water system within 365 days of the date that a water main with sufficient available capacity is adjacent to the property within an easement or right-of-way.

4.226.D.

When the Martin County Board of County Commissioners makes a determination, based upon facts and evidence presented to it, proving that:

1.

The potable water being supplied to a parcel of property by an individual potable water well or private water system constitutes a health hazard or a potential health hazard; and

2.

Connection to a regional potable water system is a reasonable means of avoiding such health hazard;

then the owner of such lot or parcel of land shall be required to connect to a regional potable water system. All such connections shall be made in accordance with rules and regulations that provide for charges for these connections as determined by the Board of County Commissioners or the private regional potable water utility.

4.226.E.

Once a service connection is made to a regional water system, disconnection from that regional water system is prohibited.