

BROWARD ENVIRONMENTAL REMEDIATION TIMES



Spring 2021

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Environmental Engineering and
Permitting Division*

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Project Initiation & the SRCO

A thorough file review at the inception of the cleanup job is critical. It should be used in conjunction with the discharge information to guide the direction of the

assessment process and to ensure that all contaminated areas are fully addressed. At this time, it is crucial to identify all historical contamination exceedances by contaminant type and location so they can be addressed during the flow of the cleanup process rather than through a patchy follow-up near the project end. It is recognized that the scale of some of the earlier report figures from the days of yore may not be as precise as today's standards and that earlier reference points used to prepare the early figures may no longer exist. In these cases, a best effort to address former locations must still be made when the figures for the modern assessment are prepared.

During the project initiation phase, keep in mind that the Site Rehabilitation Completion Order (SRCO) Package will ultimately need to include all-inclusive and cumulative data tables as well as figures documenting the analytical site history to ensure that closure requirements are met and verified. Situations have occurred where unresolved analytical exceedances were discovered during the SRCO review process which could have been addressed earlier had the

contamination points in question been identified promptly. In situations such as these, the Florida Department of Environmental Protection (FDEP) does require follow up through installation and sampling of soil borings and/or monitoring wells to address these exceedances above Cleanup Target Levels (CTLs). While it is inconvenient and fiscally inefficient to encounter this problem on a state-funded project, an occurrence such as this on a Non-Program site would have direct financial consequences to the person responsible for site cleanup.

For work that is funded through the Petroleum Restoration Program (PRP), funds are provided to the Agency Term Contractor (ATC) for a complete file review via Pay Item 1-1 of the Amended and Restated Agency Term Contract. This file review is not intended to merely fill out the Site Assessment Summary Worksheet, but to review all historical information needed to address all petroleum contamination issues associated with the eligible discharge(s) being addressed. It should be noted at this point that some Local Programs maintain both electronic and paper copy files for cleanup projects and the ATC is responsible for reviewing all project files. As an example, the Broward County electronic files can be accessed at <https://dpep.broward.org/Enviros/>. Once the Enviros files have been checked, the review of any remaining paper files not yet available in Enviros can be scheduled by contacting the Broward County File Review Coordinator at 954-519-1449.

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Project Initiation & the SRCO (continued)

A good file review has practical benefits to the cleanup field crews as well. Often, the regulatory project manager and/or the Operation and Maintenance (O&M) Inspector have visited cleanup sites during initial field work phases and found viable monitor wells that were not addressed in the current work scope or in the assessment sampling plan. These late discoveries are inconvenient, require follow-up, and influence site management via the additional personnel time and fiscal impacts to the project budget.

Data accumulation concerns related to program changes have been encountered and will be illustrated by portraying some issues associated with the historical review of lead (Pb) data with a brief reference to other analytes. A copious amount of lead data can be found in many of the old reports for site with reports dating back to the early 1990's. There are numerous lead samples collected during that time-period with a bailer which exceed current Groundwater Cleanup Target Levels (GCTLs). Additionally, historical data tables have found to have several issues including typographical errors, rounded data, and sometimes even the omission of unsung analytes before they became program-wide concerns. Some examples of these analytes include Isopropyl-benzene (Cumene), 1,2-Dibromoethane (EDB), Non-Naphthalene Purgeable Aromatic Hydrocarbons (PAHs), and Tertiary-butyl Alcohol (TBA), and these analytes do receive more scrutiny now than in times past. It is important to ensure that the cumulative data tables are populated based on the actual laboratory report data and not historical data tables whenever possible. In some cases, the laboratory reports were either not supplied or

are no longer available due to the age of some of the earliest site data. The historical tabulated data can still be presented in current data tables, but should be foot-noted appropriately so the reader can understand the potential restrictions regarding data validity. Additional details regarding the historical data review are addressed in the Autumn 2017 Remediation Times issue titled, "Contaminated Site File Review."

There have been situations involving funded sites when an ATC takes over a site with a long cleanup history. While the Florida Department of Environmental Protection (FDEP) will authorize some staff time to research and summarize historical data, there have been situations where ATCs have been allowed to submit copies in lieu of the cumulative data tables when the amount of historical data is too voluminous. This is a case-by-case exception, and the ATC should first discuss it with and get approval from the PRP Project Manager as early as possible and definitely prior to submission of a NFAP. As noted above, many of the historical tables do not always include all analytes. For example, if Purgeable Aromatic Hydrocarbons (PAHs) were analyzed but not tabulated, the missing analytes will need to be checked against the Laboratory Report(s) and a notation added to the table verifying the lack of GCTL/SCTL exceedances.

A thorough initial data review is critical in starting the cleanup project on the right path and to ensure that all contaminant issues are successfully addressed when the site gets to closure.

If you have questions or need more information regarding this article, please contact John J. Gomolka, P.G., at (954) 519-1279 or jgomolka@broward.org.

This is the first article in a 3-part series about SRCO preparation. The next article will appear in the Summer edition of the Times.

Soil Disposal Documentation

Generating drums of waste soil is common during activities authorized by Petroleum Restoration Program (PRP). In the Agency Term (AT) Contract, the unit cost for the generation, transport, and disposal of waste soil is Schedule of Pay Items (SPI) item 12-6. The requirements of the pay item are:

Transport and Disposal of Petroleum Impacted Soil (includes drum): [Per Drum]. This pay item is for transportation and proper disposal of petroleum-impacted soil at an appropriate, registered disposal facility and includes one 55-gallon capacity drum.

The documentation required for invoicing SPI unit 12-6 includes the following: field notes, photo documentation, waste manifest, and the disposal facility documentation or receipt.

A requirement AT Contractors may have noticed in recent Purchase Orders and Requests for Change is that documentation (photos) of the inside of the

In addition to the required documentation for payment of the transportation and disposal of the drums, please remove the drums from the site for proper disposal as soon as possible.

drums is required to ensure drums meet the industry-wide standard of being 75% full. The documentation is required to ensure the PRP is not paying for the disposal of partially filled drums of soil.

It is common for contractors to forget to document the drum disposal with photos. Including the recent requirement of the drums being 75% full of soil, the photo documentation is more relevant to receive payment of unit 12-6. Please provide photo documentation of each drum after filling it with soil and before sealing the lid of the drum.

In addition to the required documentation for payment of the transportation and disposal of the drums, please remove the drums from the site for proper disposal as soon as possible.



Figure 1. An example of acceptable photo documentation of a drum of soil is provided above. The drum is at least 75% full of soil and numbered to identify the drum from others in the disposal.

⇒ The AT Contract is available at the following link: <https://floridadep.gov/waste/petroleum-restoration/content/agency-term-contracts-atc>

⇒ The documentation required for payment of unit cost items authorized under the AT contract is available at: <https://floridadep.gov/waste/petroleum-restoration/documents/required-documents>

Any questions regarding this article can be directed to Mr. Fraser Mickle at (954) 519-1288 or fmickle@broward.org.

ANNOUNCEMENTS

Conferences

[FLERA 2021 Annual Conference \(in-person\)](#) in Sarasota, FL at the Lido Beach Resort on **August 4-6, 2021**

The conference will focus on resiliency, climate change, & revolutionary solutions in light of the pandemic.

[2021 National Association of Environmental Professionals Virtual Conference](#) on **May 17-20, 2021** (registration is open)

NAEP 2021 will cover topics such as: planning & permitting, NEPA, climate change, transportation, wildlife, ethics, & career development.

[National Brownfields Conference 2021](#) (in-person), **September 27-30**, Oklahoma City, OK

The conference features speakers, mobile workshops, films, and other learning formats that will provide case study examples, program updates, and useful strategies for meeting brownfield challenges.

Webinars

Thought Leaders Webinar Series highlights the latest ideas for in situ remediation from the industry's leading thinkers. The next webinar is on **April 13, 2021**: <https://remediationseminar.com/events/webinar-schedule>.

A January 2021 webinar recording from the Landfill Methane Outreach Program about how the University of California is working with Archaea Energy and landfills across the country to meet its sustainability goals can be found here: <https://www.epa.gov/lmop/webinar-case-study-university-california-renewable-natural-gas-projects>.

This webinar offers guidance for cleaning up a mercury spill and performing a thorough remediation as well as strategies for removing mercury-containing devices safely and effectively: <https://www.triumvirate.com/webinar-on-demand-mercury-spills-how-you-can-avoid-them>.

Continuing Education

The [Focused Remediation Webinar](#) is on **April 8, 2021** and offers continuing Education Credits upon participation and completion.

[35th Annual Environmental Permitting Summer School](#), in Marco Island, FL at the JW Marriott, on **July 21-23, 2021**

Continuing Education Credits are available for Licensed Environmental Professionals (LEP's) & Certified Environmental Professionals (CEP's).

These short online courses highlight leading practitioners as they discuss the latest ideas for contaminant source area delineation, bioremediation, and sustainable remediation technologies: <https://remediationseminar.com/events/online>.