

Low-Scored Site Initiative Field Inspections & Remediation Equipment Updates



LSSI Application Updates

- New application posted (Effective 9/17/2019)
- Application now requires 3 components to be considered complete:
 - LSSI Application & Contractor Selection Sheet
 - Cost proposal (If applicant is selecting contractor)
 - ***New:*** Site Access Agreement
- Application now includes links to forms and related guidance to enable owners to easily access LSSI related information
- Completed application packages may be emailed to DWM.PRP.Contractor.Recommendations@dep.state.fl.us



LSSI Application Updates

- Real Property Owner Affidavit:
 - **Paragraph (g):** *That I understand if an indemnification agreement between the real property owner of the source property listed in Part 2 of this application and the Florida Department of Transportation is required should the criteria specified in Section 376.3071(12)(b)(4)(d)(II) be satisfied and is necessary for the FDEP to issue a Low-Scored Site Initiative No Further Action pursuant to Section 376.3071(12)(b)(2), that I agree to sign such an agreement.*
 - Reminder that **Paragraph (h)** states: *I acknowledge that if site closure endpoints are not achieved under the Low-Scored Site Initiative then applicable deductibles cost share requirements will apply for subsequent state funded work.*





Important LSSI Reminders

- \$35,000 Site Assessment and \$35,000 remediation limits are set per site and not per discharge
- 15 month limitation to complete assessment & remediation. 12 additional months to complete groundwater monitoring
- Eligibility program deductibles (ATRP & PLRIP) and cost shares (PCPP) are waived under LSSI. However, cost shares specified in previously executed SRFAs must be adhered to if applicable discharges are being addressed via LSSI
- FDEP is required by statute to issue LSSI NFA once criteria are met
 - Owner/applicant may choose to execute a monitoring well transfer agreement to continue voluntary work towards SRCO. However, LSSI NFA will still be issued.
- LSSI NFA criteria may be applied to ineligible discharges if all other criteria (score <29 pts, etc.) are met



Determining Which Sites are Appropriate for LSSI

- Consider eligibility information and number of source areas that require assessment and/or remediation
- Determine if the site layout and infrastructure has changed since the eligible discharge was reported. If so, consider if eligible source areas are accessible for assessment/remediation.
- Are there any plans to redevelop or renovate the property that may provide an opportunity for access?
- Evaluate historical contamination data and extent of plumes
- Consider the depth-to-water and whether or not an appropriate assessment can be performed within LSSI funding
- Are any previously installed monitoring wells still present which can save funding for other activities?

LSSI No Further Action

- LSSI NFA Criteria*:
 - a) Soil saturated with petroleum or petroleum products, or soil that causes a total OVA ≥ 50 or 500 parts per million does not exist onsite
 - b) A minimum of 12 months of groundwater monitoring indicates that the plume is shrinking or stable
 - c) The release does not adversely affect adjacent surface waters
 - d) The plume is either confined to the source property or has only migrated beneath a transportation facility with agreed upon MOU
 - e) The groundwater plume is not a threat to any permitted potable water supply well
 - f) Soils onsite between land surface and 2 feet bls meet the soil cleanup target levels, or human exposure is limited by appropriate institutional or engineering controls

** Summarized. See 376.3071(12)(b), Florida Statutes for complete criteria*



Field Inspections

- Field work notifications, cancellations and postponements should be emailed to PRPInspector@dep.state.fl.us as well as the Site Manager
- Notifications should be sent at least 7 days prior to scheduled initiation of field work
- Field Inspectors are frequently travelling to sites only to learn that field work has been cancelled or rescheduled
- Notifications will ideally include the following information:
 - Facility ID Number
 - Facility Name
 - Facility Address
 - LSSI Work Order Number or Purchase Order Number
 - Field Activity Description (e.g., groundwater sampling)
 - Field Dates
 - Estimated Time of Arrival



Field Inspections

- Field Inspector roles:
 - Verify that ATC and subcontractor field staff OSHA Hazwoper certifications are current and that crews are conducting work in a safe manner
 - Ensure that work is being performed in compliance with the specified scope of work and FDEP SOPs/guidance
 - Photograph and document site conditions and field work activities
 - Liaison between ATC and Site Manager to communicate field conditions and facilitate resolutions (Change Orders)
 - Assist ATC field staff with resolving questions regarding field procedures to reduce potential for rework





Field Inspections

- Noticeable decrease in non-compliance with field SOPs across the state, particularly in the South Region!
- Common field issues noted through inspections:
 1. Canceled field work without notification
 2. Sampling VOCs at flow rates <100 ml/m (Section 3.2.3.2, FS2200, DEP-SOP-001/01)
 3. Prefilled groundwater sampling logs (purge rates & flow rates)
 4. Soil samples exposed to elements for extended duration prior to OVA or lab collection (Section 5.2, FS3000, DEP SOP-001/01)
 5. Decontamination in grassy/unpaved areas
 6. Lack of tremie pipe for monitoring well filter pack and grout installation
- Safety Notes:
 - Secure core drills
 - Severely cracked/broken monitoring well pads (report to Site Managers)

Remediation Equipment



- Approximately 1,019 pieces of remedial equipment remaining at 96 sites in FDEP inventory
- 2019 inventory currently underway
- ATCs and Site Managers should be evaluating performance of older state-owned equipment to ensure return on investment
- Consider lease option prior to system modifications or replacement of significant/costly components
- If purchase replacement is deemed cost effective, documentation is required for FDEP Property Section records
 - Type of documentation required will depend on how equipment was initially capitalized
 - Entire system versus individual component capitalized
 - Questions on equipment purchases and surpluses can be directed to Carmel Vernon (cvernon@northstar.com)