

Conditional Closure Update

1. Additional Tool Development

- a. Converting ICR map layer to shapes to provide better information with regard to what it is restricted and why
 - i. ICR database undergoing major re-design and re-development
 1. Track greater level of detail
 - ii. Available on MapDirect
 1. Asking PRSR to submit shape files of restricted areas with conditional closure package
 - iii. Sharing with WMD
 1. SWFWMD integrated into well permit request
 - a. Intercepts request and routes for further review (DEP assist)
 2. Work with SJWMD next
- b. Use of local ordinances
 - i. Continues to be challenging due to variety of ordinances
 - ii. Refining MapDirect layer to provide more comprehensive information
 - iii. Also looking at being able to estimate distance from water line
 - iv. Mandatory hook up ordinance, by itself, not sufficient
- c. FDOT MOU for petroleum sites
 - i. In-place and in-use
 - ii. Somewhat limited – petroleum only
 1. Working on at least one standalone non-petroleum
 - iii. In negotiations for an MOU to cover other contaminants
- d. Migrate ICPG to web-enabled document
 - i. Allow for easier maintenance
 - ii. Update sections/templates without updating whole document

2. Conditional Closure Considerations

- a. Delineation – must know where the contaminated site is.
 - i. Full horizontal and vertical extent of contamination must be known in all media
 1. Soil
 2. Groundwater
 3. Surface Water
 4. Sediment
 - ii. Delineation must be to the lowest applicable CTL
 1. Soil: Residential direct exposure/Leachability
 2. Water: the lower of the surface water or groundwater CTL, if surface water potentially affected
- b. Risk Evaluation – all routes of exposure
 - i. Soil
 1. Direct exposure
 - a. 0-2'
 - b. Below 2'
 2. Leachability

- ii. Groundwater
 - 1. Drinking water
 - 2. Irrigation
 - 3. Stormwater
- iii. Surface water
 - 1. Surface water standards
- iv. Sediment
 - 1. Eco-risk
- c. Controls – protective and durable
 - i. Soil
 - 1. Direct exposure
 - a. 0-2'
 - i. Cap & digging restriction – engineering control & institutional control
 - b. Below 2'
 - i. Digging restriction – institutional control
 - 2. Leachability
 - a. Impermeable cap – Engineering control and institutional control
 - ii. Groundwater
 - 1. Drinking water
 - a. Prevent use
 - i. Institutional control
 - ii. Local ordinances
 - 1. “Hook-up” ordinance by itself is generally not sufficient
 - 2. Need to control well installation
 - b. Organoleptic Exemption
 - 2. Irrigation
 - a. Evaluate if allowable
 - i. IWSLs
 - 3. Stormwater
 - a. Evaluate if allowable
 - iii. Surface water
 - 1. Generally, can’t conditionally close with exceedances of surface water standards
 - iv. Sediment
 - 1. Generally, can’t conditionally close with exceedances of SQAGs