

**Department of Environmental Protection  
Bureau of Petroleum Storage Systems  
Petroleum Cleanup Program**

**Procedural and Technical Guidance for Site Characterization Screening**

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**Executive Summary**

The Florida Department of Environmental Protection (DEP) Bureau of Petroleum Storage Systems (BPSS) presents this procedural and technical guidance to establish procedures for funding cleanup work for Site Characterization Screening (Screening) at program eligible sites with a priority ranking score below the current cleanup funding score. This Screening will establish whether each discharge eligible for the Inland Protection Trust Fund (IPTF) at the site will be classified as an Imminent Threat, may be issued a Site Rehabilitation Completion Order (SRCO), qualifies for the Long-Term Natural Attenuation Monitoring (LtNAM) Initiative, or will need to continue to await cleanup funding based on score.

**Benefits of Screening**

There are many benefits of Screening to the State, property owners and persons responsible for site rehabilitation (PRSRs), and citizens. Screening will:

- Identify discharges that may be an imminent threat to human health or the environment so that immediate, out of priority order funding for cleanup activities can be approved,
- Close sites that have no exceedences of cleanup target levels and remove them from the list of funded sites awaiting cleanup,
- Establish a baseline contamination level to help detect future discharges at active facilities and to use as historical data during cost share negotiations of Site Rehabilitation Funding Allocation (SRFA) agreements,
- Provide plume information to PRSRs that may encourage them to fund source removals or other cleanup activities at their expense to obtain closures or identify sites that might qualify for conditional closure, and
- Provide a fiscal estimate of cleanup to PRSRs to assist them in future planning.

### **Screening Endpoint Categories**

The goal of Screening is NOT to perform a complete Chapter 62-770, Florida Administrative Code (F.A.C.), (all references to Ch. 62-770, F.A.C., includes any subsequent replacement rules) assessment (unless the discharge qualifies for closure). The goal is to collect only enough information about a discharge to place it into one of the following four categories:

1. Imminent Threat (IT)
  - Based on a BPSS evaluation of information submitted in the report and other available information
  - Start funding cleanup with IT funding priority
  - Continue funding IT until threat is gone
2. Long-Term Natural Attenuation Monitoring (LtNAM)
  - Qualifies pursuant to current LtNAM guidelines
  - The purpose of the Screening is to only determine if the site qualifies for LtNAM. Funding for LtNAM activities will occur after the site becomes eligible based on the priority ranking score.
3. Await Cleanup in Priority Score Order
  - Data indicates that the conditions do not warrant funding cleanup out of priority order and the site does not qualify for LtNAM or a SRCO. Additional cleanup activities will continue after the site becomes eligible for funding based on priority ranking score
4. Closure Order
  - Qualifies for one of the following closure options:
    - i. Risk Management Options Level I (RMO I) without institutional and engineering controls pursuant to subsection 62-770.680(1), F.A.C., or
    - ii. Risk Management Options Level II (RMO II) with institutional controls or institutional and engineering controls (NFAC) pursuant to subsection 62-770.680(2), F.A.C., or
    - iii. Low-Scored Site Initiative No Further Action (LSSI NFA) for sites with a score of 29 or less.

### **Screening Requirements**

- All Screening work shall be performed under the FDEP Quality Assurance Program SOP 001/01, Chapter 62-770, F.A.C., or its replacement, Section 376.3071, Florida Statutes (F.S.), procedural and technical criteria associated with the BPSS, all applicable County, District, and State regulations, and any other applicable procedures that relate to the work being performed. Additionally, State funded work under the BPSS Preapproval Program shall adhere to the current BPSS Petroleum Cleanup Preapproval Program Standard Operating Procedures Manual (SOP).
- Screening does not eliminate other statutory or rule requirements for cleanup, how State funds may be expended, or the requirements of the eligibility programs. Screening also does not eliminate the need to comply with other statutory and/or rule requirements for

establishing and providing public notice of engineering and institutional controls when required to prevent exposure to any remaining contamination.

- Funding for Screening is limited to sites with discharges eligible for an Inland Protection Trust Fund petroleum cleanup program. Deductibles for each discharge's eligibility program will not be required at the beginning of the Screening funded work and will not be required if work stops after completion of Screening. Deductibles will, however, be required (if not previously collected) if the site qualifies for IT funding or closure.
- Petroleum Cleanup Participation Program (PCPP) co-payments will not be required for Screening activities to be funded; however, the Screening does not change the PRSR's requirement to complete a Limited Contamination Assessment Report (LCAR) at the PRSR's expense if the Screening funded work does not result in issuance of a SRCO. The LCAR will not be required for Screening work to be performed, but if a SRCO is not issued under Screening, the LCAR will still be required when the site's score comes into State IPTF funding range.
- Discharges with 100% funded SRFA agreements may proceed with funded Screening. However, due to the uniqueness and diversity of site-specific circumstances related to SRFA agreements with cost-shares that are not 100% funded, Screening for these SRFA sites will be evaluated on a case-by-case basis.
- For sites funded through an Indigent Consent Order, the Screening will include an evaluation of the site-specific risks and the most cost-effective path to closure.
- Screening assessments and/or monitoring shall be limited to an investigation of the eligible discharge(s). For example, for Early Detection Incentive (EDI) eligible discharges, any petroleum discharge that existed on the site at the time of the request to become eligible for EDI can be included in the investigation. However, for Petroleum Liability Restoration Insurance Program (PLRIP) and PCPP discharges, the Screening investigation must be limited to the specific discharge(s) that is (are) program eligible unless the discharge is considered a subsequently discovered discharge pursuant to Section 376.30716, F.S. If a site has multiple eligible discharges, Screening should be performed on all appropriate eligible areas.

For the BPSS to fund assessment through a Screening Work Order or Task Assignment, the following steps must be completed:

### **STEP 1: Contractor Designation**

Before commencing any work, the Preapproval Contractor Designation Form (CDF) will have to be completed and submitted by the current property owner or qualified PRSR to indicate their choice of Contractor for the Petroleum Preapproval Program (unless there is a pre-existing CDF in place). A State Cleanup Contractor will be assigned to perform the Screening work if the owner/PRSR requests it, if a new CDF is requested and not received within the specified deadline, or if the site owner/responsible party is subject to a consent order, final judgment, eligibility, waiver or agreement based on an inability to pay. The contractor designated must be qualified to perform work under the Preapproval Program. To further expedite the Screening process, once the CDF process has been completed, the site will be assigned to a Site Manager in

Tallahassee or a contracted local program and no further switch in designated contractor will be authorized for the Screening portion of the cleanup. Until the CDF is accepted by the BPSS and has been assigned to a BPSS site manager, proposals to conduct Screening will not be considered. Refer to sections 1.4.6 and 2.1 of the Preapproval SOP for more information on Screening, CDFs and Contractor Qualification requirements.

## **STEP 2: Screening Proposal**

After the CDF for Screening has been approved, the BPSS will contact the designated contractor to request a proposal. It is highly recommended that the contractor and BPSS site manager have a pre-proposal teleconference for at least the first few proposals being prepared due to the unique work being performed. Cost-effectiveness will be monitored by the BPSS. Because the objective of this initiative is only to categorize the discharge, it is anticipated that any necessary site assessment (if required) will not be extensive or complicated for the majority of the sites.

The proposal shall include a review of all available information about the site that may be used to sort the discharge into the proper Screening category. The Historical Summary Form must be completed and submitted with the proposal in addition to appropriate pre-existing and most recent figures (site plan, groundwater elevation flow map, groundwater plume map, OVA isoconcentration map) and tables (groundwater elevation summary table, groundwater analytical summary table, OVA summary table, and soil analytical summary table). Information gained from the file review shall be incorporated into the recommended scope of work for the Screening assessment. For examples of various strategies for creating a scope of work for the proposal based on site-specific situations, see Attachment 1.

The contractor must perform the Screening funded work in the most cost-effective manner practical. A Screening assessment is not the same as a complete Chapter 62-770, F.A.C., assessment, and thus some components of established assessment goals are not appropriate for Screening work. The contractor must develop the proposal and cost template to address the limited assessment goal of determining which Screening category a discharge will be placed in.

PRSRs and contractors are encouraged to bundle sites together for the purpose of performing cost-effective work at a site. By combining the work at multiple sites into a “milk run” type of investigation (possibly utilizing direct push and/or mobile lab as appropriate) a cost savings can often be realized (although BPSS must issue separate screening work orders for each site).

At a minimum, the following components will be required in the proposal in order to obtain approval of the Screening project:

- a. Discussion of all known discharges, eligible and ineligible, including location, extent, Contaminants of Concern (COCs) involved, and the date(s) of the approval of the site assessment phase (if applicable) for each discharge.
- b. Description of previous assessment and/or remediation work, including appropriate and most recent figures and tables.
- c. A description of the current site conditions and layout sufficient to perform the proposed site work, including but not limited to:

- i. Existence and usefulness of existing monitoring points.
- ii. An accurate representation of the site layout as related to assessment access (can the screening be performed as planned with no new structures or obstructions that would inhibit the ability to perform the scope of work as proposed).
  - If the contractor arrives at a site and is unable to perform the scope of work because of access or site layout problems that should have been addressed before the site visit, then file review and/or costs associated with an improper field event may be denied.
- d. A description of the exact scope of work that is being proposed (including the location and number of sampling points) and the reason and justification as to how the proposed scope is necessary to properly Screen each eligible discharge.
- e. Expected itemized breakdown for the costs to perform the Screening Assessment including, but not limited to:
  - i. Soil and/or groundwater assessment. An estimate and justification for the proposed scope of work for a Screening assessment of all eligible discharges must be provided in the proposal. An estimated number of baseline and conditional samples and costs must be provided. For discharges that do not have previous assessment data, the proposal should usually include baseline borings/wells needed in the source area(s) as the first event. Contingency borings/wells that may require stepping out from the source area based on the results of the baseline event can be included in the first or subsequent events, but require communication with the BPSS to obtain authorization as the field work advances. Sites that have had previous assessment should design the Screening assessment based on pre-existing data. SPLP and TRPH fractionation costs should be built in to the field event costs so that these procedures can be performed by the lab when appropriate. The scope of work must be designed to make sufficient use of each field event to foster the most cost-effective use of funding.
  - ii. At least three competitive quotes must be submitted for each of the allowed direct-push drilling and drum disposal subcontractor costs as set forth in the SOP. For laboratory and non-direct-push drilling subcontractor costs that use the preapproval unit rates, only one quote needs to be provided.
  - iii. Preparation of a Site Characterization Screening Report (Screening Report) with details as described in Step 5 of this document.
  - iv. Templated Items:
    - File Review shall be allowed for all sites where a thorough file and site review has been completed and the Historical Summary Form has been properly completed and submitted with the proposal. A thorough knowledge of the discharge information and the current layout and condition of the site are essential to proposing a proper scope of work.

- Unless negotiated otherwise, Proposal Preparation shall be allowed for all sites where;
  1. a proposal is received as requested by BPSS, and
  2. the Historical Summary Form has been completed, and
  3. it has been demonstrated that the current site layout and conditions are appropriate for the proposed scope.
- For sites where Screening field work is performed, the Screening Report template item (H17) will be allowed for the preparation and submittal of the Final Screening Report. For the rare circumstances where a site will have more than \$50,000 of field work performed as part of the Screening process, the contractor may request a variance to the H17 reporting cost.
- For sites that can be categorized into a Screening category based on a review of existing data without the need for additional assessment, the Letter Report (H2) will be allowed for preparation and submittal of the Final Screening Report in lieu of the H17 reporting cost. The Site Characteristics Worksheet is still required to summarize the data.
- Other activities, such as Area Survey and a Professional Land Survey (PLS), can only be allowed if justified as necessary on a site-by-site basis if demonstrated to be an activity required to properly categorize a discharge, however this should be rare.

A completed project proposal to conduct a Screening assessment (including the completed Historical Summary Form and appropriate figures and tables) must be sent to the appropriate BPSS or Local Program (LP) site manager.

### **STEP 3: Screening Assessment**

The various stages of work associated with Screening must be performed by qualified staff who have the knowledge and experience to collect, analyze, interpret, and evaluate the data and information pertaining to the investigation. Assessment of the eligible discharge(s) should be completed using the Streamlined Assessment approach when appropriate (see the link at [http://www.dep.state.fl.us/waste/quick\\_topics/publications/pss/pcp/StA-Guidance.pdf](http://www.dep.state.fl.us/waste/quick_topics/publications/pss/pcp/StA-Guidance.pdf)). For sites in which no prior assessment activities have been completed and no existing monitoring wells are installed in the area(s) of the discharge(s), the assessment should start at the known or suspected source of the discharge with baseline borings and/or wells, unless historical data demonstrate the need for a different approach. For example, a typical approach may be that if the eligible discharge was in the tank pit, the soil and/or groundwater sampling should first be performed near the exclusion zone (within three feet of the storage tank system). Any pre-existing data shall be included in this determination, with the age of the data evaluated for appropriateness. Attachment 1 contains examples of various strategies for completing the first field event based on the availability of pre-existing assessment data. After completion of baseline work, contingency borings/wells or additional sampling are only allowed if the data are needed to categorize the discharge into one of the Screening endpoints, or to obtain a closure pursuant to Rule 62-770.680, F.A.C.

When planning for laboratory analyses of samples collected, the options outlined in paragraph 62-770.600(5)(a), F.A.C., concerning exceptions to the requirement for the Gasoline or Kerosene Analytical Groups should be considered as a cost-saving measure when appropriate. Care should be given to only perform necessary analyses, for example do not analyze for COCs that have been previously demonstrated to not be associated with the eligible discharge (for example, if previous assessment already demonstrated that PAHs are not present, do not analyze for PAHs). In addition, because Screening is not aimed at collecting information specific to performing remedial action, do not evaluate the site for the presence of COCs that would not be related to the eligible discharge (such as solvents if the eligible discharge co-mingles with a dry cleaner site plume).

Communication from the field between the contractor and the BPSS is essential to performing a proper and authorized scope of work. During a field event, as data are collected, there should be effective communications on whether more information must be gathered to be able to sort the discharge into a Screening category, or if the fieldwork can stop. Work that is built into a Work Order or Task Assignment as a contingency to the baseline work must be approved by the BPSS (based on the results of the baseline work) before it can be completed or as outlined in the work order or task assignment. If contingent field work that has not been included in a Work Order or Task Assignment is determined to be necessary to properly categorize a discharge, it can be added into the scope of work as appropriate through a change order.

Applicable pathways to closure should be evaluated as part of the Screening evaluation. For example, SPLP and/or TRPH fractionation should be performed when the results could demonstrate the site qualifies for closure. Evaluation of the existence of only background contamination that is not associated with the eligible discharge [such as Benzo(a)pyrene, EDB, etc.] should also be performed when appropriate.

If free product is found and is associated with the eligible discharge, evaluate whether the site qualifies for the Free Product Recovery Initiative and, if it does, include an evaluation and recommendation in the final Screening Report (for information on the Free Product Recovery Initiative see the link at [http://www.dep.state.fl.us/waste/quick\\_topics/publications/pss/pcp/free\\_product/FPRIGuidance-011508.pdf](http://www.dep.state.fl.us/waste/quick_topics/publications/pss/pcp/free_product/FPRIGuidance-011508.pdf)).

Although it is not necessary to perform a complete Chapter 62-770, F.A.C., assessment for most sites being screened, discharges cannot be issued a closure order unless they satisfy the requirements of the Rule. Therefore, if screening indicates a discharge may qualify for closure, care must be taken to insure the Rule requirements are met, collecting additional information when necessary.

#### **STEP 4: Evaluation of Remedial Action Method and Cost**

1. Using all information available, provide a recommended proposed course of action and cost to achieve Site Rehabilitation without conditions in accordance with RMO I. A generalized breakdown of the costs must be provided which demonstrates how the total cost was reached. Include cost based on estimated method of treatment and time needed for treatment. The scope of the assessment which is conducted should be based on the minimum data necessary to categorize the site into one of the four categories. High

precision in the cost estimate for cleanup is not expected and the scope of the assessment should not be driven by this consideration. Some cases will necessitate a greater degree of speculation in cleanup costs than others, such as an off-site plume at active remedial action levels for which the extent remains undefined.

2. Using all information available, provide a recommended proposed course of action and cost to achieve Site Rehabilitation with conditions in accordance with RMO II. A generalized breakdown of the costs must be provided which demonstrates how the total cost was reached. Include cost based on estimated method of treatment and time needed for treatment. The estimated cost of installing an engineering control to prevent exposure to and /or migration of contamination should be included.

### **STEP 5: Submittal of the Site Characterization Screening Report**

The final deliverable shall be a Screening Report. This Screening Report will be used to provide written documentation and backup information to support the findings and applicability of a category recommendation, and as backup documentation for invoicing. The report should include:

1. A discussion of the assessment activities performed (if any) under the Screening as well as a summary of the results of any pre-existing and current field or laboratory data used to evaluate the proper category for the discharge.
2. Scaled site maps as appropriate, including but not limited to:
  - a. Site location topographic map.
  - b. Site plan (layout).
  - c. Soil and groundwater plume maps indicating OVA and/or laboratory analysis trends as well as interpretations of chemical concentrations with isocontour lines. Due to the limited objectives of this screening, complete plume delineations will often not be possible, in which case, inferred plume boundaries should be provided to the extent practicable.
  - d. Groundwater elevations and flow direction map.
3. Tables as appropriate, including, but not limited to:
  - a. Soil and groundwater tables summarizing current and historical field-collected and laboratory data.
  - b. Water table elevation tables.
  - c. Monitoring well construction tables.
4. All field notes, boring logs, well construction and development logs, and groundwater sampling logs as required per BPSS guidance documents.
5. Completion of the Potential Indicator Parameters for Imminent Threat Worksheet, if applicable.
6. Completion of the Site Characterization Worksheet, including an estimate of the scope and cost to obtain an RMO I and the most cost-effective RMO II closure.
7. Summary, Conclusions, and Recommendations.
8. A PG or qualified PE certification is required to attest to the field work portion of the report.



### **Project Approval Priority**

Those Screening work orders and task assignments included in a given weekly obligation approval list will be encumbered in site priority score order up to the available amount remaining in the weekly cap. Secondary prioritization for sites with the same priority score will be based on the earliest Cost Center Administrator signature date, and lastly, if necessary, on the earliest program eligibility date.

### **Invoicing**

Per the current BPSS SOP and Petroleum Cleanup Preapproval Program Spending Procedures, the final invoice for a Work Order must be submitted to the BPSS or LP within 30 days after the date of written approval of the final deliverable by the BPSS or LP. As stipulated in the Work Order terms and conditions, failure to submit the final invoice within this timeframe may result in the forfeiture of the unpaid balance of the Work Order.

### **Contact Information**

For more information on Screening, please contact:

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## ATTACHMENT 1 Steps to Screening Assessments

- Obtain as much information about the site before planning field work. This includes, but is not limited to:
  - Oculus
    - Website located at <http://dwmedms.dep.state.fl.us/Oculus/servlet/login>
  - Site files
  - PRSR, owner (if not the PRSR), tenant interviews
  - Google and Bing Maps
  - Contaminant Locator Map (CLM)
    - Website located at <http://webapps.dep.state.fl.us/DepClnup/welcome.do;jsessionid=58k3PGhXFv2FQvJnZJZJJxmCbyv61tQx32lFSnLklLM7F1jZTCwp!-2041400521>
    - If no assessment has been performed at a site, CLM can locate nearby sites where information on DTW and lithology can be used to help design a first field event.
- If previous work has been completed, use the previous information to build a first field event.
- Site visits for the sole purpose of a “site recon” are rarely justified if a thorough collection of information has been completed. A review of historical data, discussions with the PRSR/owner/tenant, and Google and Bing maps are usually sufficient to determine the presence of monitoring wells or whether there are obstructions to intrusive work. A first field event should not be restricted to observation only, but should also include soil and /or groundwater sampling if applicable. Instead of visiting a site to determine if monitoring wells that were last sampled many years ago still exist, plan to sample an appropriate number of the monitoring wells if they do still exist. While on the site, evaluate the appropriateness of collecting hand augered soil samples if they are beneficial to the screening process. If monitoring wells do not exist, then borings can be used to set temporary wells for obtaining groundwater samples and determining groundwater flow direction.
- If there has not been intrusive work completed at the site previously and the depth to water (DTW) and lithology are unknown, then:
  - Research work done in the area (CLM is useful) to help decide the best technology for the first field event based on the estimated DTW and lithology,
  - It is often unnecessary to install permanent monitoring wells for Screening; temporary wells can be utilized. For site with shallow water tables, hand augers (and a core drill) can be used to obtain soil samples for lab analyses, groundwater samples for screening, and to set temporary wells to get groundwater flow direction if needed.
    - Groundwater samples from temporary wells can often provide sufficient information to satisfy the goal of Screening (which is to classify the site into one of 4 screening categories) and permanent wells might not need to be installed.

- If screening at a site indicates the site might qualify for closure, a higher level of data collection and analyses may be required and the criteria in Chapter 62-770, F.A.C., must be met. Data from temporary wells can only be used in a closure decision if the temporary wells were properly constructed and the groundwater samples are representative of any dissolved concentrations that may be present in the groundwater. For example;
  - The screened interval of the temporary wells must intersect the water table and include a minimum of three to five feet of saturated screen. For sites that have a perched aquifer, an evaluation (depth to the regional water table, how continuous the perched aquifer is across the site, etc.) will need to be made as to whether groundwater samples will need to be obtained from the perched aquifer as well as the regional water table,
  - An appropriate sand pack (pre-packed or poured) is utilized or the lithology of the saturated screened interval is an appropriate sand,
  - Proper sampling protocols are followed.
- There are instances where it may be more cost effective to install permanent wells even if there is a shallow water table at the site. For example, if all of the monitoring wells have been destroyed at the site and previous groundwater sampling data indicated very low concentrations were detected in the groundwater samples, it may be more cost effective to install permanent wells at the site if it is anticipated that two quarterly groundwater sampling events may result in closure for the discharge rather than having to install temporary wells for each quarterly sampling event.
- For sites that have a very deep water table, an evaluation will need to be completed by the BPSS or LP Professional Geologist and the consultant Professional Geologist as to whether a monitoring well will be required to be installed at the site. This evaluation will need to be based on lithologic data obtained from the site and site area, and the depth of soil contamination at the site.
- Since borings must be hand-evacuated to a 4-6' depth for safety reasons, use of a drilling rig for collecting soil and/or water samples when the depth to water is 6-8 feet or less is often not necessary. Use of a direct push or drilling rig for shallow water tables as a first field Screening event must be justified, and may be allowable under certain circumstances:
  - If flowing sands or other lithology does not allow collection of soil or groundwater samples from a hand augered soil boring,
  - If the number of borings/temporary wells required is large, such as if the plume size is large or if there are numerous source areas to investigate.
  - A direct push rig should NOT be used if the only justification is the ease of advancing through pavement, unless it is demonstrated to be a cost-effective approach.
- The goal of the Screening should be to only gather enough soil and groundwater assessment information to categorize the discharge into one of four categories and to obtain enough assessment information to complete the information requested in the Site Characterization Worksheet. There is no requirement for the Screening to define the

vertical extent of the groundwater plume and to complete soil borings and wells off-site to confirm whether the soil and groundwater plumes extend off-site. If elevated concentrations are detected on-site at the property boundaries, then an estimate can be made as to the extent of the plume off-site and the extent of the off-site plume can be illustrated on the plume maps included in the Screening Report with dashed lines.

- Only sample and analyze samples for the COCs necessary to perform the Screening. Using what was listed on the DRF as the petroleum product that was discharged is often not accurate or it is listed on the DRF as unknown. If the discharge is anticipated to meet the NFA criteria in which case a limited suite can be analyzed for per 62-770.600(5)(a).
- Do not “over analyze” a site. Rule 62-770.600(6) states that if initial testing doesn’t indicate that any COCs within a specific analytical procedure are present above CTLs, or that the presence of a COC is due to a background concentration, that analytical procedure is no longer required.
  - Discharges that were made eligible for the EDI program did not require lab verification of contamination. Some discharges were made eligible due to a lower standard of screening such as “odor in well” or “inventory discrepancy” or an OVA reading. These examples represent site screening that indicate the need to perform additional assessment but do not document contamination in excess of CTLs. These discharges that did not document lab verified contamination are not considered to have been assessed. As such, when we do investigate these sites and our assessment documents that there are no CTL exceedences, we do not have to perform another quarter on confirmatory sampling to qualify for a Level 1 RMO closure.
- One of the goals of Screening is to close discharges at sites that meet the closure criteria outlined in Chapter 62-770, F.A.C. As the Screening process (or just the file review) identifies discharges at sites that might qualify for closure, appropriate steps must be taken to comply with the requirements of Chapter 62-770, F.A.C., to obtain a closure. During the Screening process, all reasonable pathways to closure should be investigated and additional field work should be authorized when appropriate to evaluate the various options including:
  1. Risk Management Option Level I:
    - SPLP
    - TRPH Fractionation
    - 95% UCL
    - Background contamination evaluation
  2. RMO II:
    - If the PRSR and the property owner (if different from the PRSR) are willing to accept a conditional closure