

**Petroleum Cleanup Program**

**REMEDIAL ACTION PLAN GUIDELINES**

**BUREAU OF PETROLEUM STORAGE SYSTEMS**

History: New 9/10/93, Revised 5/1/98

Identification No.: BPSS-7

Topic of Guideline: Administrative Procedures

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Signature and Date  
PE ADMINISTRATOR

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Signature and Date  
BUREAU CHIEF

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This guideline describes the administrative procedures for completion and submittal of a Remedial Action Plan (RAP) and other documents associated with preparation of a RAP and implementation of a remedial action.

**Local Programs**

The Department has contracted with a number of local government offices for review responsibility for Site Assessment Reports (SAR), Remedial Action Plans (RAP), and other documents prepared under the petroleum cleanup program. The names and addresses of these offices along with the name of the local government program coordinator are shown in Exhibit A. For sites located in one of these areas, all technical documents should be submitted directly to the local program offices. This includes SAR, RAP and RAP Addendum, RAP Modification, record drawings, status reports, Monitoring Only Plan, Natural Attenuation Proposals, Alternate Procedure requests, and Site Rehabilitation Completion Requests. Two copies of any of these reports must be submitted to the local program office. It is not usually necessary to submit an additional copy to the Bureau of Petroleum Storage Systems. The local program office will correspond directly with the responsible party and their consultant. Approval Orders for RAPs, MOPs, Site Rehabilitation Completion, and Alternate Procedures will be prepared by the local program office but will be issued by the Department of Environmental Protection, Division of Waste Management.

If a cleanup site is located in a local program area, the local program should be consulted for additional or different requirements for preparing a RAP and implementation of remedial action. Local governments and local program offices may have

ordinances or policies which are different from the Department. In such cases the more conservative or stringent of the requirements shall apply; however, when there are discrepancies in requirements which result in significant increased cleanup costs, these incremental costs may not be allowable for funding under the petroleum cleanup preapproval program. The Bureau of Petroleum Storage Systems may be contacted to make a determination on these matters.

### **Submittal Due Dates, Time Extensions**

Rule 62-770.700(1), FAC, requires that a Remedial Action Plan be submitted within 90 days of approval of the Site Assessment Report. If this schedule cannot be met, a request for a time extension must be submitted to the Bureau of Petroleum Storage Systems, the DEP district office overseeing the cleanup, or appropriate local cleanup program prior to the RAP submittal due date. The time extension request must explain the reason for the delay. The 90 day time frame for submittal of a Remedial Action plan is suspended while the Department (or contracted local cleanup program) reviews a pilot study proposal.

Initiation of remediation system construction must commence within 120 days of the date of the RAP Approval Order. If this schedule cannot be met, a request for a time extension must be submitted to the Bureau of Petroleum Storage Systems, the DEP district office overseeing the cleanup, or appropriate local cleanup program prior to the end of the 120 day period.

Record drawings (as-built plans) are to be submitted within 120 days of initiating operation of the remediation system. A time extension must be requested if this schedule cannot be met. Technical requirements for the content of record drawings are described in guideline BPSS-5.

Status reports must be submitted at least annually unless a greater frequency is specified in the RAP or under a preapproval program workorder. Normally, annual reports are considered to be sufficient for technical evaluation of remediation progress. More frequent reports may be appropriate if the time frame of remediation is projected to be two years or less. The technical requirements for the content of status reports are described in Rule 62-770.700(11). The annual status report information shall be summarized on form 62-770.900(5).

Only one copy of most technical reports and correspondence including RAPs, record drawings, and status reports needs to be submitted to the Bureau of Petroleum Storage Systems. Local programs and district offices of the DEP should receive 2 copies of these documents. Three copies of Alternate Procedure requests must be provided to either the Bureau of Petroleum Storage

Systems or the appropriate contracted local cleanup program office.

TC/tc

Attachment