Second Annual Business Plan Meeting Held in Daytona Beach

The FDEP held its second annual Business Plan Meeting August 7-8, 2001, in Daytona Beach, Florida. More than 200 individuals attended this year’s meeting, including representatives of environmental consulting firms, contracted Local Programs, and FDEP. Changes in the Preapproval Standard Operating Procedures (SOP) Manual were discussed, such as the inclusion of a new template format and the incorporation of the Streamlined Site Assessment and Template Site Assessment Report (TSAR).

Length of Time for Site Assessments
One of the major problems addressed by the Preapproval Program in these revisions is the time it takes to complete site assessment. Recent studies show it takes anywhere between 12 to 24 months to complete a full assessment from initiation of the original work order to assessment approval. Because every taxpayer dollar spent by the Florida Legislature has to be used wisely and efficiently, this length of time is not acceptable. The reasons why assessments are taking so long to complete and the problems associated with such extended schedules include:

- rigid work scopes negotiated into each work order,
- limited invoicing opportunities during the assessment process, forcing consultants to shoulder costs, and
- insufficient funding allotted for report preparation.

The Streamlined Site Assessment
The Streamlined Site Assessment takes a common-sense approach to Preapproval and encourages contractors and site managers to plan for the “big picture” in cleanup rather than get caught in the process loop of proposals, field events, invoices, and proposals again. The new template has been incorporated into a Microsoft® Excel workbook that automatically completes recurring fields (Site Name, Contractor Name, etc) throughout the spreadsheet based upon data entered on the work order header. The work scope and additional opportunities for field work are negotiated into the work order to limit the number of mobilizations to a site and to encourage the completion of soil and groundwater assessment in a minimum number of events and amount of time. The template has been split into six (6) field events. Up to nine (9) invoices for field and reporting activities are possible, as opposed to just five (5) under the previous template format.

See: Business Meeting, continued on page 2

Also in this Issue:

- 2001 Florida Remediation Conference To Be Held in Orlando
- Broward Staff Attends Fifteenth Annual FDEP Storage Tanks/Cleanup Meeting
Gone are the days of negotiating Level 1 through Level 4 General Reports. These classifications have been eliminated. Payment for report preparation is now based on a percentage of the non-subcontracted field work completed. The larger the work scope, the more money to prepare the report.

The Template Site Assessment Report (TSAR)
For new assessment sites, the TSAR is now mandatory. The TSAR is detailed and labor intensive to complete. To offset the additional work necessary for successful completion of the TSAR, a one-time charge has been added to the work order template for initial map and table generation. The TSAR should not be utilized on sites currently in the middle of assessment or beyond (to prevent duplicate work from being completed). If you have an approved work order for assessment prior to September 1, 2001, do not use the TSAR.

Other SOP and Template Issues
There are a few other points of note regarding the SOP and new template:
- The requirements of the Professional Land Survey have changed. A full legal description of the subject and surrounding properties are no longer required. Also, the location and dimensions of all underground utilities as evidenced by manholes, fill port covers, sawcuts (including those for remediation system piping), storm sewer grates, etc., are now mandatory. (See Section 7.8 of the SOP)
- In instances where there is no change in the work scope, FDEP will not require a cost reduction nor pay additional money for subcontracted expenses if the invoiced amount to the contractor is less than the amount previously approved in the work order. (See Section 6.7.3 of the SOP)
- Site managers have been encouraged to grant two proposal preparations for assessments as part of streamlining. The second proposal is intended to cover the next phase of work and forces both the contractor and site manager to always look forward and keep the goal of site closure in mind. The second proposal should be part of the deliverable in order to cut down the time between work orders.

An overview of the presentations, along with draft SOP, can be viewed at: http://www.dep.state.fl.us/dwm/programs/pcp/default.htm. You may also use this link in order to download the Preapproval Work Order Template (scroll down on the webpage to find the template file). Please check back often with this website, as the Template is currently undergoing revision. The TSAR can be found at http://www.dep.state.fl.us/dwm/programs/pcp/geninfo/site.htm

Additional questions about this article? Contact Mr. David Singleton, P.G., at dsingleton@broward.org or Mr. Steven Memberg at smemberg@broward.org.
The FDEP 15th Annual Storage Tanks and Cleanup Program Meeting was held at the Adam’s Mark Hotel in Daytona Beach on September 10 - 12, 2001. Broward County cleanup and tank compliance staff attended the meeting, as well as a cross-section of representatives from FDEP, other Local Programs, and environmental consulting firms.

**Cleanup Sessions**

Presentations applicable to the Cleanup Program ranged from Assessment 101 to the intricacies of the two-tiered Pay for Performance Program (PFP). A sampling of the new policies and memorandums which were introduced include:

A. *Scope and Focus of Review of Engineering Documents Submitted for Sites with Different Funding Sources* (Dated 9/6/01): Contains guidance on the reviews and approvals of engineering documents which are conducted by the Professional Engineers of FDEP and contracted Local Programs.

B. *Soil Source Removal Guidelines for Petroleum Cleanup Preapproval Program Sites* (Dated 9/6/01): FDEP has re-visited the issue of source removal. Contains guidance which indicates that a 25% cost effectiveness advantage will be given to the consideration of source removal as a remedial action at preapproval sites.

C. *Supplement to Milestone Policy - “Time to Switch” Evaluation Procedure* (9/6/01): This guidance outlines evaluation procedures to be used when milestones are not met with existing remedial systems. Includes the reconsideration of natural attenuation monitoring, system modification or enhancement, etc.

Mike Ashey gave a State of the Program address, expressing the accomplishments of the past year and optimism about the future. Oculus, a web-based mechanism to view Preapproval documents, was noted as a major success. Mike requested that, in order to minimize access problems, everyone be considerate of fellow users and log off the website when finished using the search engine and document viewer. For more information on Oculus, please see the July/August 2001 Edition of the Times at [http://www.broward.org/ppi01511.pdf](http://www.broward.org/ppi01511.pdf).

Mike announced a reorganization of the FDEP Preapproval staff structure. The Preapproval Program will now be managed by Brian Dougherty, allowing Tom Conrardy, P.E., to serve as liaison for technical- and engineering-related issues, as well as Funding Allocation Agreements. Brian indicated in his inaugural address that he intends to ease the paperwork load of Team II so that staff may spend more time in the field, visiting Local Programs to conduct administrative reviews, provide guidance, and strengthen interagency communication. Brian also presented new administrative processes which will speed up work orders, contractor payments, and other paperwork. Of particular note is the fact that Local Programs will act as Cost Centers for the review of non-final Preapproval invoices rather than the FDEP, effective October 1, 2001. Local Program staff must still forward final Preapproval invoices to FDEP for review and approval.

Effective September 10, 2001, all Program staff will start using 2001-2002 fiscal year funds and should update work orders accordingly. Mike Bland, P.G, announced that the next bid period for the Pre-approved Advanced Cleanup (PAC) Program is from November 1, 2001 through December 31, 2001. Because PAC funds remain from the last period, the PAC program is well funded for the next bid period. Mike also summarized information regarding the Petroleum Cleanup Participation Program (PCPP). He indicated that 110 agreements have been signed to date. Please note that PCPP sites cannot participate in PAC.

See Tanks/Cleanup Meeting, continued on page 4
There will be two FDEP geologists available to the Local Programs for technical support, Paul Gruzlovic (who will handle the NE, NW, and Central portions of Florida) and John Vargo (who will handle the SE, SW and Southern portions of Florida).

Tom Conrardy, P.E., wanted to encourage tank owners to do early upgrades and indicated that there may be financial advantages to early upgrades. He indicated that initial remedial actions may be delayed to coincide with tank upgrades. Tom reviewed the new source removal policy and indicated that, in many cases, source removal may provide a more predictable result in both cleanup schedule and accuracy in predicting cleanup costs. He also wanted to emphasize that if a discharge was closed with conditions, eligibility is maintained after closure in case additional work on the discharge is required.

The rest of the Cleanup meeting was split into break-out groups covering a variety of topics. See upcoming issues of the *Times* for more detailed information on these sessions.

**Tank Compliance Verification Sessions**
Sessions geared towards the tank compliance staff of FDEP, Local Programs, and private consulting firms included an Industry Trade Show, a Storage Tank Regulation Update, and technical training including:

- Discharge Prevention/Recovery
- Mineral Acid Training Session
- Integrity Testing for Secondary Containment Systems
- Underground Storage Tank Leak Prevention
- Tank Closure Assessment
- Corrosion Control, Cathodic Protection, and Piping Sumps

During the Main Session, Mr. Marshall Mott-Smith of FDEP highlighted two achievements and successes of the past year which specifically involved Broward County: The Broward County/FDEP Petroleum Storage Tank Facility Inspection Guide and Broward's Significant Non-Compliance (SNC) Resolution Status Report. The Petroleum Storage Tank Facility Inspection Guide is a well-designed book which explains the components of a storage tank system and the regulations which apply to them. The Guide was published with the tank owner and general public in mind, and contains illustrations and applicable contact information. Broward’s SNC Resolution Status Report indicates that Broward County, through the Significant Non-compliance Contract, was able to resolve a whopping 96% of high-priority (designated as “SNC A”) tank non-compliance cases.

**And a Last Word...**
As to be expected, the tragic events of September 11, 2001, had a sobering effect on the conference. In recognition of the boundless grief caused by the cruel and senseless attacks on our Nation, proceedings were paused for a moment of silence (led by Mike Sole). Then, as a reflection of American determination, and in order to minimize the disruption intended by the terrorists, the conference was resumed as planned.

**Links**
Highlights of the main Cleanup sessions can be found at: 
http://www.dep.state.fl.us/dwm/programs/pcp/
Presentations of the Tank Compliance Verification sessions and more information regarding the SNC Program can be found at: http://www.dep.state.fl.us/dwm/programs/tanks/default.htm
FEEDBACK FORUM QUESTIONNAIRE
Please print out this page from your web browser and then type or print to complete. You may fax this form to the attention of Lorenzo Fernandez, P.E., at (954) 765-4804. Alternatively, you may mail the form to Mr. Fernandez at Broward County DPEP, 218 SW First Ave., Fort Lauderdale, FL 33301. (Please use the back of this form or an attachment if you require extra room for your answers)

Date: ____________________________

SECTION ONE: How can we contact you? (Optional)

Name ____________________________ Title: ____________________________

Company/Agency: ____________________________

Address: ____________________________

City/State/Zip: ____________________________

Email Address: ____________________________ Telephone: ____________________________

SECTION TWO: The Environmental Assessment and Remediation (EAR) Program

What areas of environmental clean-up regulation, policy, and procedure require further explanation or guidance?

What do you feel are the strongest elements of the EAR Program?

What areas of the EAR Program need improvement?

Would you characterize your interaction with EAR Section personnel as positive, negative, or indifferent? Please explain.

In your experience with other regulatory agencies, what programs were successfully implemented to improve the environmental remediation process?

SECTION THREE: The Broward Environmental Remediation Times

What types of additional information in the Times would be of benefit to you?

Would you recommend the Times to others? Please provide the names and email addresses for those individuals you feel would wish to receive the Times.