**TECHNICAL SECTION**

The Person Responsible for Site Rehabilitation (PRSR) is responsible for submitting a No Further Action (NFA) proposal at the time site rehabilitation activities are deemed complete for the Florida Department of Environmental Protection’s (FDEP’s) review/approval [62-780.680, Florida Administrative Code (F.A.C.)]. Information (as detailed in this checklist) should be submitted by the PRSR to support the NFA proposal. The NFA proposal with the checklist information can be included in a Site Assessment Report, Risk Assessment Report, or a Site Rehabilitation Completion Report in accordance with Rule 62-780.680(4), F.A.C.

The PRSR needs to submit an NFA proposal that includes the proposed Risk Management Option [62-780.680(1), 62-680.680(2), or 62-780.680(3), F.A.C.] being recommended. The PRSR should also indicate if Engineering Controls are being used and if any of the following are used to meet Chapter 62-777, F.A.C., cleanup target levels: alternative, provisional, best achievable, or organoleptic (groundwater only) cleanup target levels; the use of background levels; the use of 95% upper confidence limit calculations; or TRPH fractions. The NFA proposal should also include any proposed conditions, restrictions, etc. that are planned for inclusion in the Declaration of Restrictive Covenant (DRC).

The Department will review the NFA proposal and supporting information to determine whether the site meets 62-780.680, F.A.C. closure criteria. Site managers should inform the PRSR of the need to submit the applicable information outlined in this checklist that supports the NFA proposal. This should include all media contaminated by the source property, remedial actions implemented, and the current site conditions.

All NFA proposals, Site Rehabilitation Completion Reports, and other documents recommending site closure are required to include a Professional Certification Statement, as specified in Rule 62-780.400(2), F.A.C. The Professional Certification Statement needs to certify that all work pertaining to the site rehabilitation closure process was conducted in accordance with Chapter 62-780, F.A.C.

**Technical Checklist for Evaluating Compliance with 62-780.680, F.A.C.**

The table below is intended to be used as a guideline for ensuring that the appropriate information is provided to the FDEP to evaluate NFA at a site. This checklist is to be utilized by the PRSR to complete the Site Rehabilitation Completion Report or similar report containing the NFA proposal.

The checklist poses several questions applicable to soil, groundwater, surface water, and sediment. These questions serve as the main topics to be addressed within the Site Rehabilitation Completion Report or other reports containing the NFA proposal. The left side of the table includes main topics for the applicable media and the right side of the table presents examples of specific types of information to be incorporated to address the main technical questions. The expectation is that each topic question will provide brief summary level information from the various technical reports completed for the site.

FDEP Site Managers should use this checklist as a guide to ensure that the PRSR reports are complete and suitable for closure evaluation.

**NOTE: THIS IS NOT A FORM TO BE FILLED OUT. THIS IS ONLY SUGGESTED CONTENT FOR THE SITE REHABILATION COMPLETION REPORT.**

**SOIL:**

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| 1.Is contaminated soil present?  | Include tables showing historical sampling results including confirmatory results. |
| 2. Is soil horizontally and vertically fully delineated?  | Provide summary discussion.  |
| 3. Does contaminated soil extend off site? | Include figures showing the extent of soil impacts.  |
| 4. Are direct exposure controls in place (as necessary)?  | Is soil present above the residential Soil Cleanup Target Level (SCTL)? What controls (institutional and/or engineering) are proposed? Provide figures identifying the location and extent of the controls.  |
| 5. Are remaining soil concentrations greater than the commercial/industrial SCTLs?  | Describe any institutional controls proposed. |
| 6. Are site-specific alternative SCTLs proposed? If so, explain which alternative form is proposed. | Examples include provisional, alternative, background, or best achievable SCTLs. Were site specific properties used to calculate alternative SCTL? |
| 7. Is soil exceeding the leachability SCTL present? | Have site specific leaching SCTLs been derived? Was SPLP or TCLP used to demonstrate no leachability? Has the site been uncapped (bare ground) 2+ years with at least one year of groundwater monitoring results demonstrating absence of contaminants’ leaching to groundwater?If soil exceeds the leachability SCTL, were institutional and / or impervious engineering controls proposed? Provide figures identifying the location and extend of the controls.  |
| 8. If the 95% UCL approach was used, describe the exposure unit and parcel size.  | If using a site-wide exposure unit for calculation of 95% UCLs, then either subdivision needs to be prohibited or agree to re-calculate if the property is subdivided. |
| 9. Is the exposure unit greater than ¼ acre? | Unless statistically demonstrated that contaminants are uniformly distributed such that a 95% UCL based on alternative exposure unit size will be protective; exposure unit shall be located within source property. |
| 10. Are engineering controls in place?  | Has an Engineering Control & Maintenance Plan (ECMP) been submitted?  |
| 11. Is there a digging restriction proposed/required? | Provide a description. Describe the proposed measures to prevent future digging. |

**Free Product**

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| 1.Is free product present?  | Are there fire or explosive hazards; is an engineering control proposed? Is free product stable? |

**GROUNDWATER:**

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| 1.Is contaminated groundwater present? | Provide tables showing historical groundwater concentration results. |
| 2. Is the groundwater plume horizontally and vertically fully delineated? | Provide a figure(s) showing the plume extent. |
| 3. Are institutional controls applicable on-property and/or off-property for groundwater use?  | Provide a description. |
| 4. Are engineering controls implemented for groundwater (e.g. slurry wall)? Do these controls require groundwater monitoring plan? | Provide a description.  |
| 5. Does plume extend off the source property?  | Provide a description. |
| 6. Is groundwater plume extent less than or greater than ¼ acre? |  Provide a description. |
| 7. Is the groundwater plume stable/shrinking? | Provide evidence for determination. |
| 8. Are site-specific alternative Groundwater Cleanup Target Levels (GCTLs) proposed? Was background used to achieve GCTLs? | Examples are provisional, alternative, best achievable, organoleptic, or background GCTLs. |
| 9. A Monitoring Well Abandonment Plan should be prepared for submittal to DEP. | All monitoring wells will need to be properly abandoned as part of the closure process with abandonment reports submitted to DEP within 30 days of plugging and abandonment completion [62-532.410; 62-532.900(2), F.A.C.]. |

**EXISTING SITE FEATURES:**

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| 1.Are there existing (active) or planned wells (including irrigation) on the source property? | Will these non-monitoring wells affect the existing groundwater plume? Provide evidence (e.g., engineering calculations, modeling, historical groundwater monitoring analytical data, etc.) confirming plume stability. |
| 2. Is there a plan to abandon non-monitoring wells on the site? | Provide a description. |
| 3. Are there any stormwater features present on the property? | Are restrictions required to prevent future construction of stormwater features? |
| 4. Is there a potential for the plume stability to be affected by an on-site stormwater feature(s)? | Provide a description. |
| 5.Is there a potential for surface or marine waters to be affected by the groundwater plume? | Provide a description. |
| 6.Is there a restriction proposed/required for dewatering? | Provide a description. |
| *Note*: if potable groundwater use is prohibited but existing or future irrigation wells are not prohibited, the PRSR needs to provide a risk evaluation if future irrigations wells are proposed. |

**SURFACE WATER:**

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| 1.Is contaminated surface water present? | What is the distance from the source property to the surface water body; is it a marine water body? |
| 2.Has an ecological risk assessment been completed? | Provide a description. |

**SEDIMENT:**

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| 1.Is contaminated sediment present? | Provide a description. |
| 2. Is delineation of contaminants in sediment complete? | Provide a description. |
| 3. Is an engineering control required? | Provide a description. |
| 4. Has an ecological risk assessment been completed? | Provide a description. |