

Interim Source Removal Proposals (ISRPs)

WHAT THEY ARE, HOW TO USE THEM,
AND WHY THEY ARE IMPORTANT



What Is an ISRP?

What the Code says...

- 62-780.525 Interim Source Removal
 - The objectives of the interim source removal are to remove specific known contaminant source(s) and provide temporary control to prevent or minimize contaminant migration, and to protect human health and the environment prior to the approval of a Remedial Action Plan prepared and submitted pursuant to rule 62-780.700, F.A.C., or in the cleanup of de minimis discharges pursuant to rules 62-780.550 and 62-780.560, F.A.C.



What Is an ISRP?

- ISRPs are scoped by using RAP Pay Items.
 - All of the same requirements for a RAP are needed for an ISRP.
- Remedial Strategies Allowed for Interim Source Removal
 - Free Product Recovery
 - Short-term Groundwater Recovery
 - Interim Groundwater Remediation
 - Soil and Sediment Removal, Treatment, and Disposal
 - Excavation
 - Soil Vapor Extraction



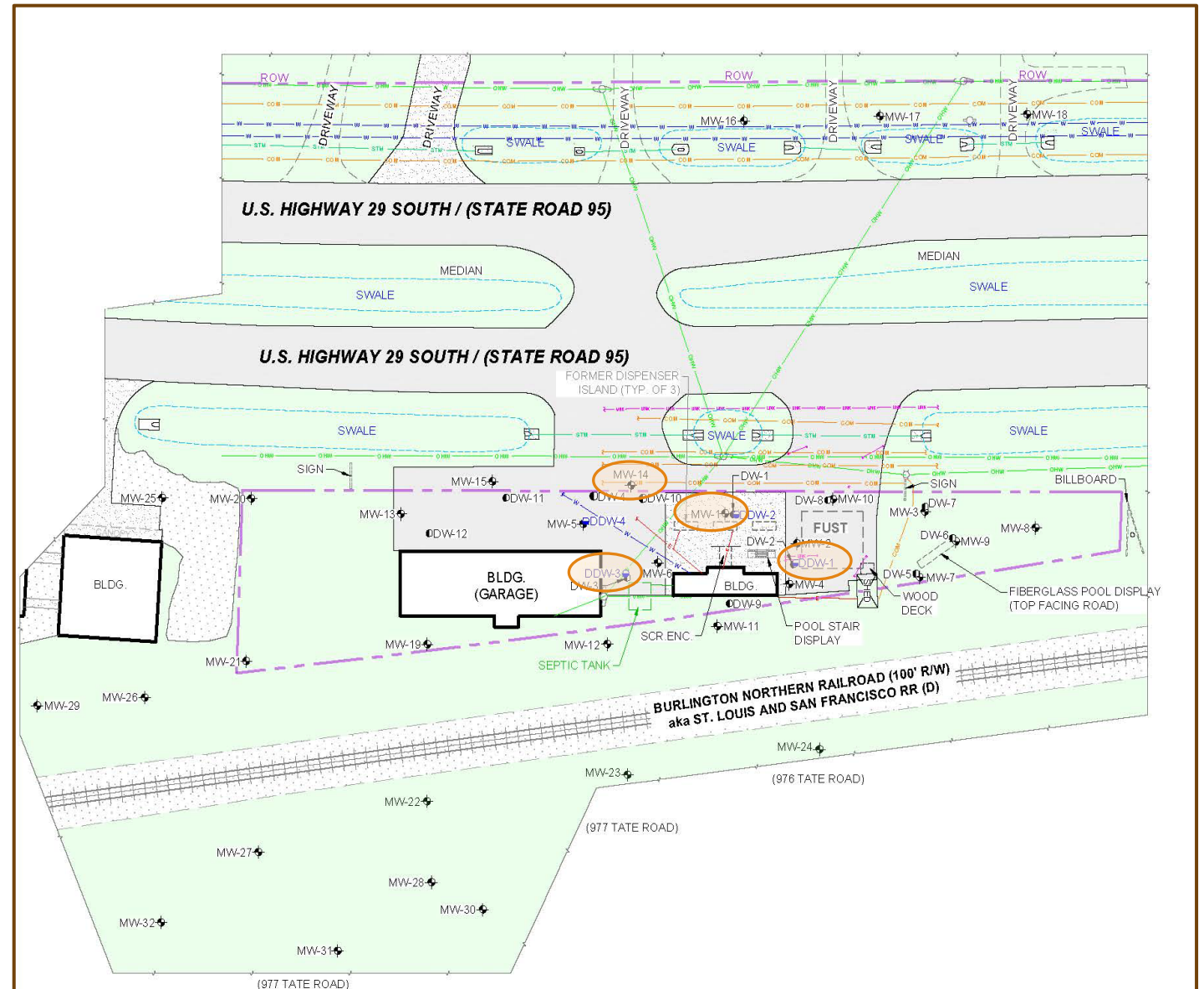
How to Use Them?

When are ISRPs useful?

- Migratory Plumes
 - Plumes moving laterally are a major concern as the risk to human health stretches further and further from source.
 - Plume migration can also happen vertically, which creates the similar problems to lateral migration
- Changing Site Conditions
 - Site redevelopment
 - Road expansion
 - Tank upgrades

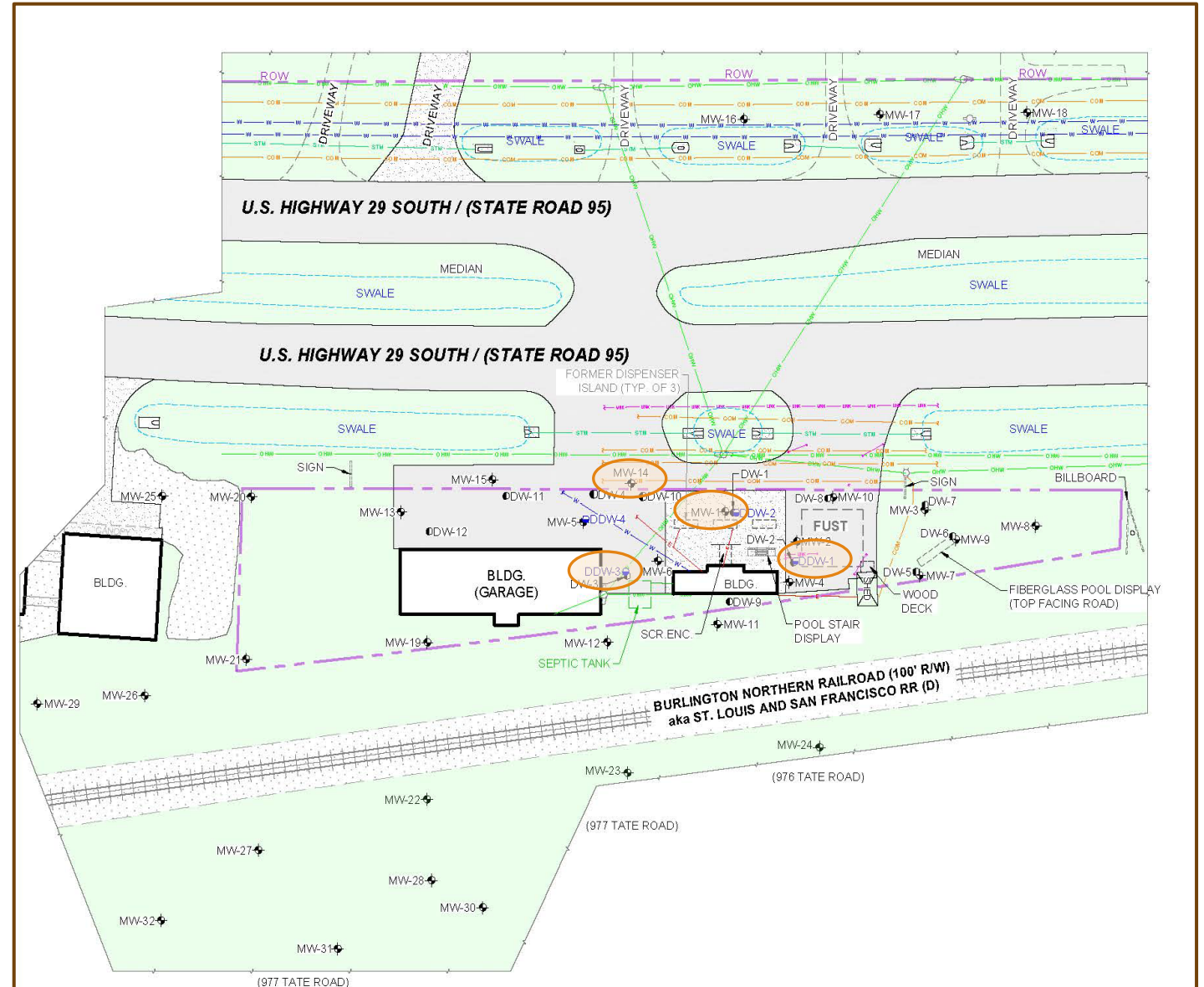
17/8626776 – McDonald Station

- 12/14/1988 EDI Discharge
- Has Shallow (20' – 35' bls) and Deep (50' – 55' bls) Impacts
- Has Free Product onsite



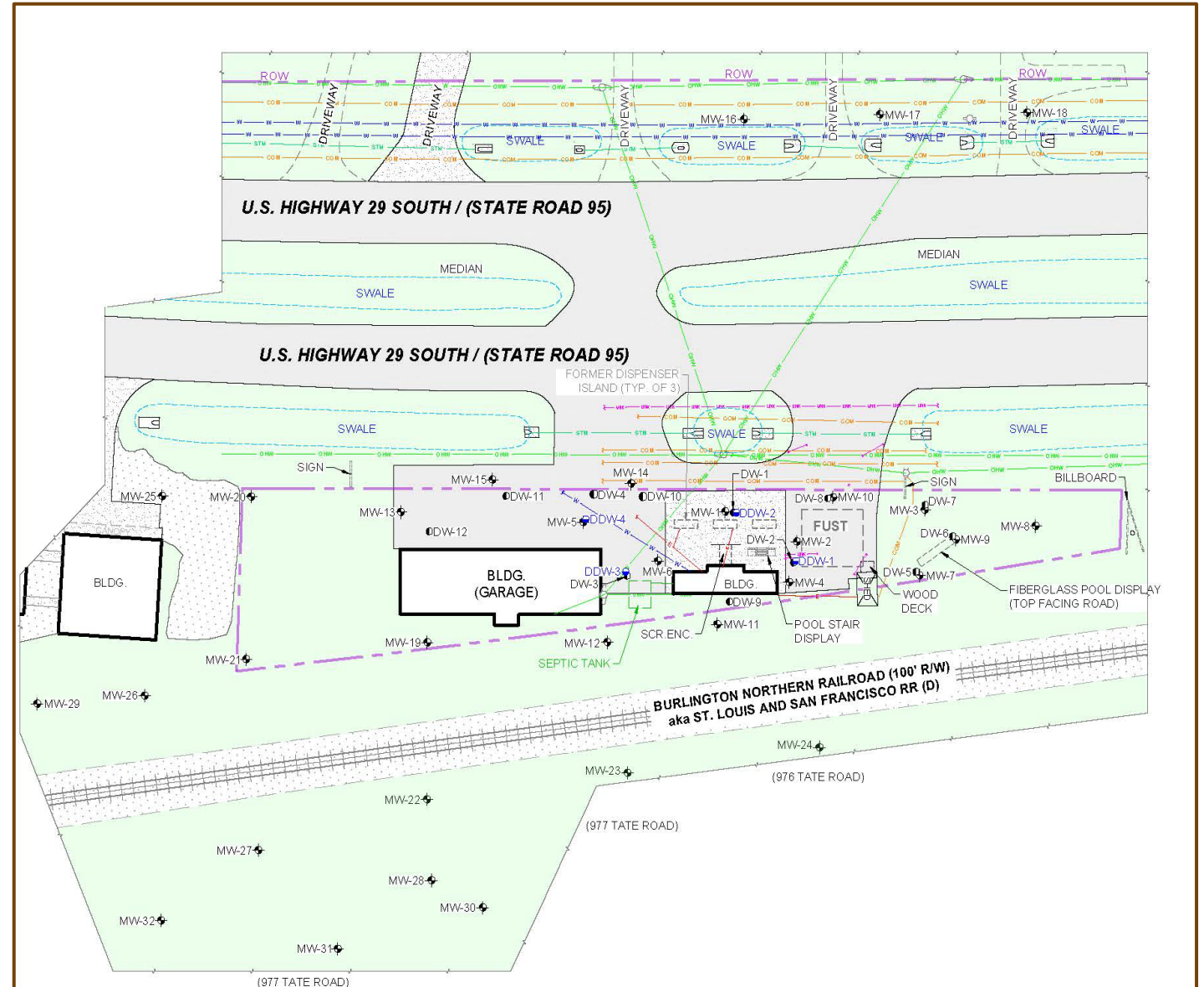
17/8626776 – McDonald Station

- Currently, plume is present on 4 separate land parcels
 - 3 of which are residential
- DTW fluctuates between 26' – 28'



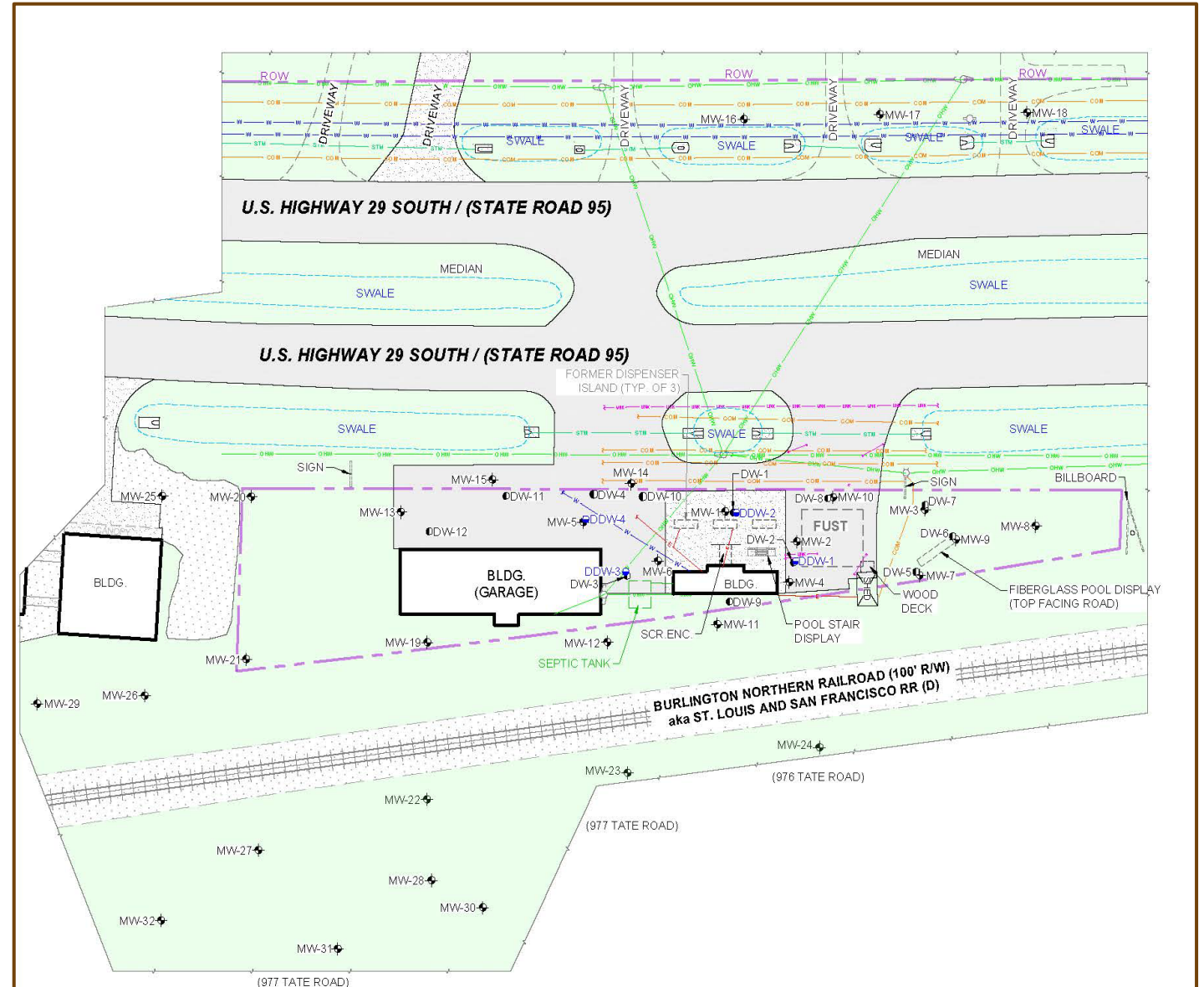
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- Free Product Recovery is ongoing in two onsite wells
- Offsite Owner concerns
- Plume is migrating laterally to the west in the direction of groundwater flow



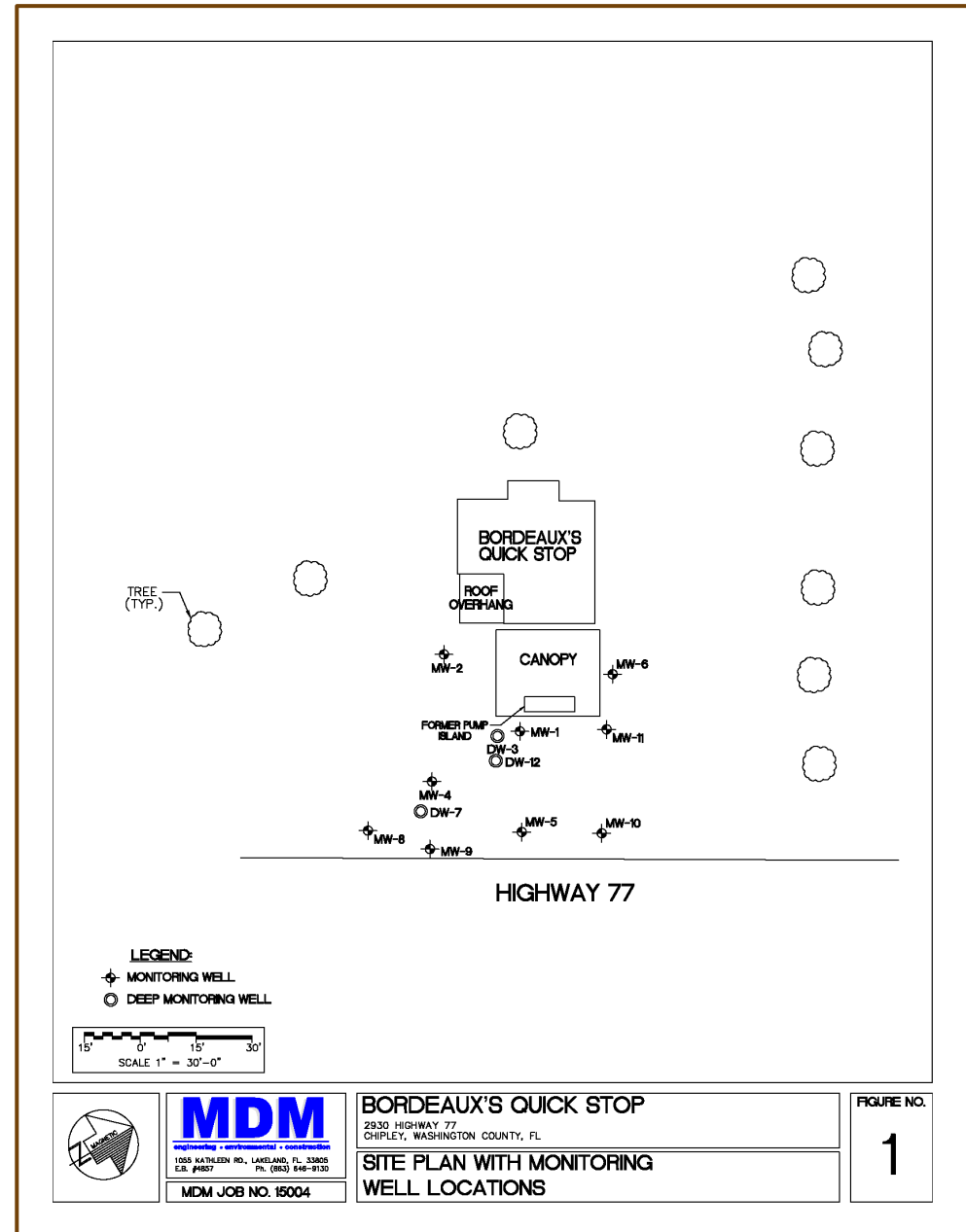
17/8626776 – McDonald Station

- Currently looking at doing SVE on the edge of the source property away from wells with free product if that is possible



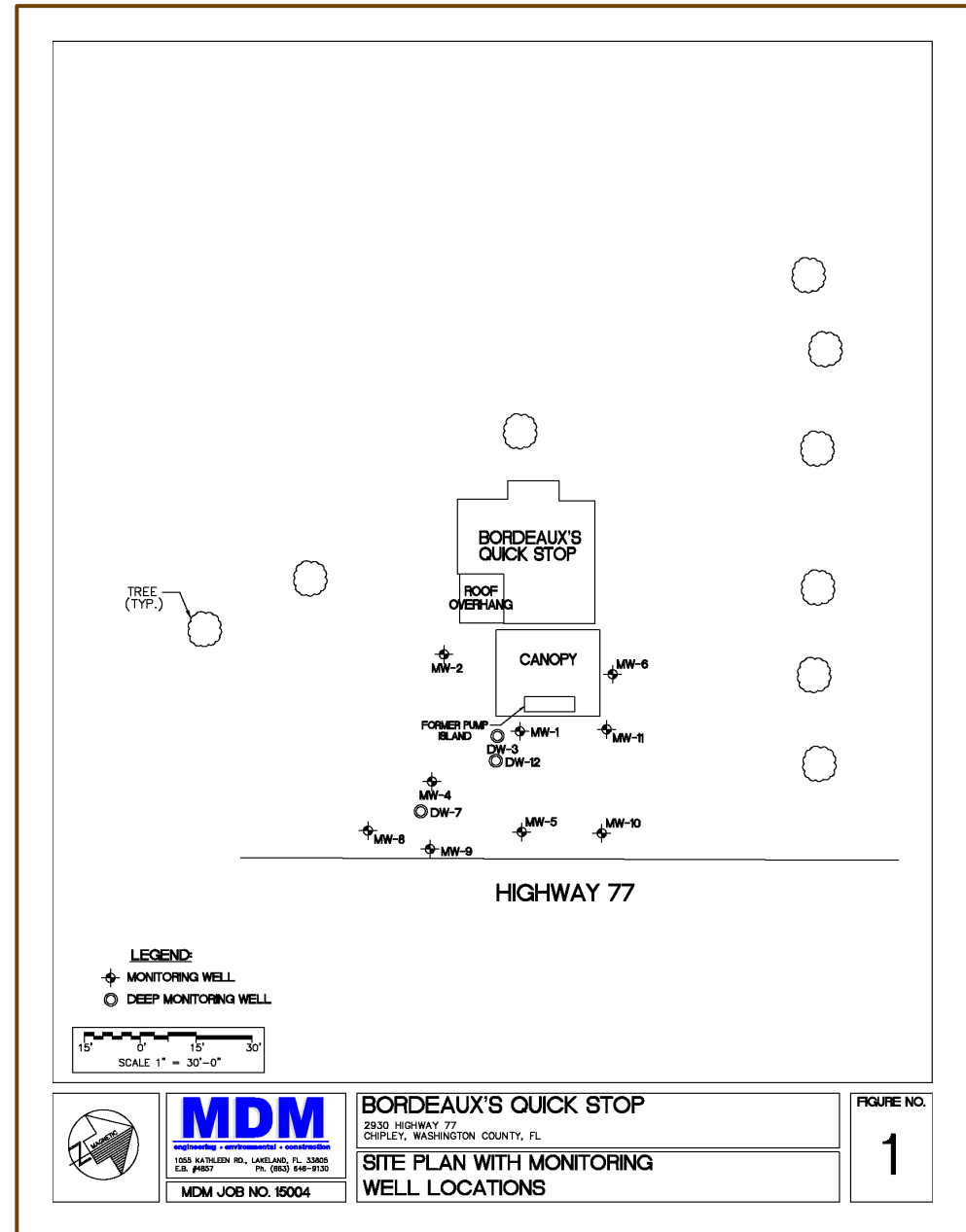
67/8840849 – Bordeaux's Quick Stop

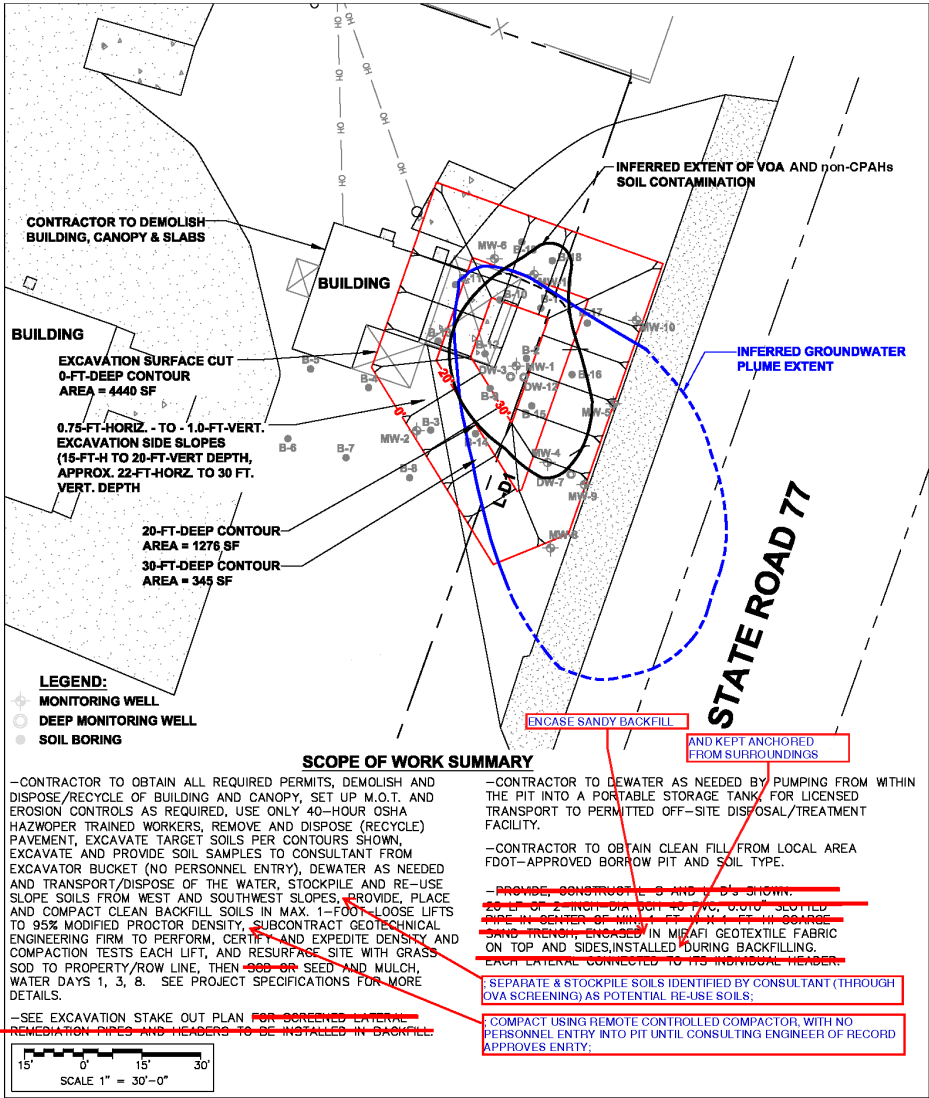
- 11/15/1988 EDI Discharge
- Direct Exposure Exceedance for TRPH in top foot of soil
 - Leachability exceedances in other vadose borings



67/8840849 – Bordeaux's Quick Stop

- Had Shallow (2' – 12' bls) and Deep (21' – 26' bls) Impacts
- DTW was around 4' bls





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BORDEAUX'S QUICK STOP

2930 HIGHWAY 77
CHIPLEY, WASHINGTON COUNTY, FL

EXCAVATION PLAN

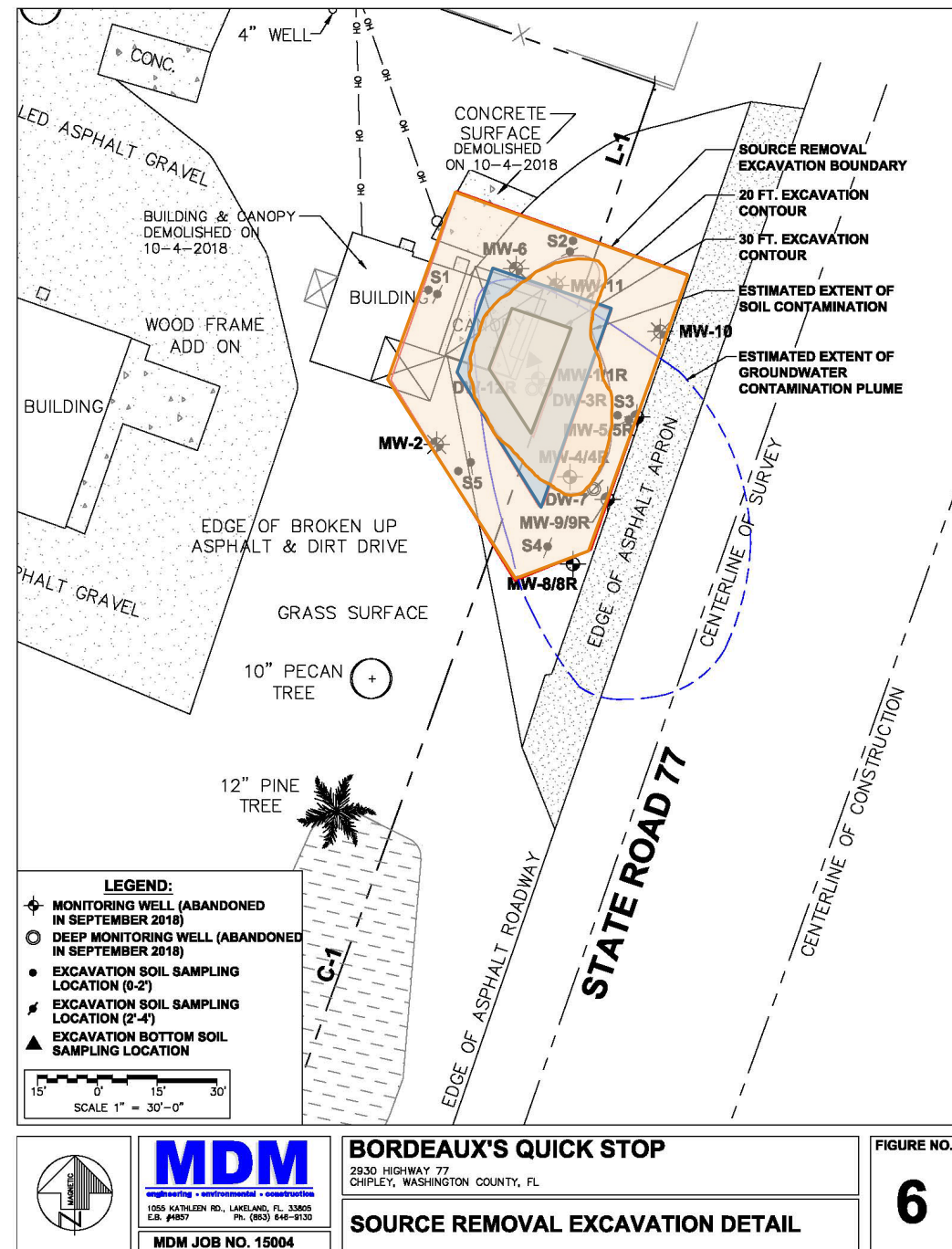
FIGURE NO.

9
REVISED

MDM JOB NO. 15004

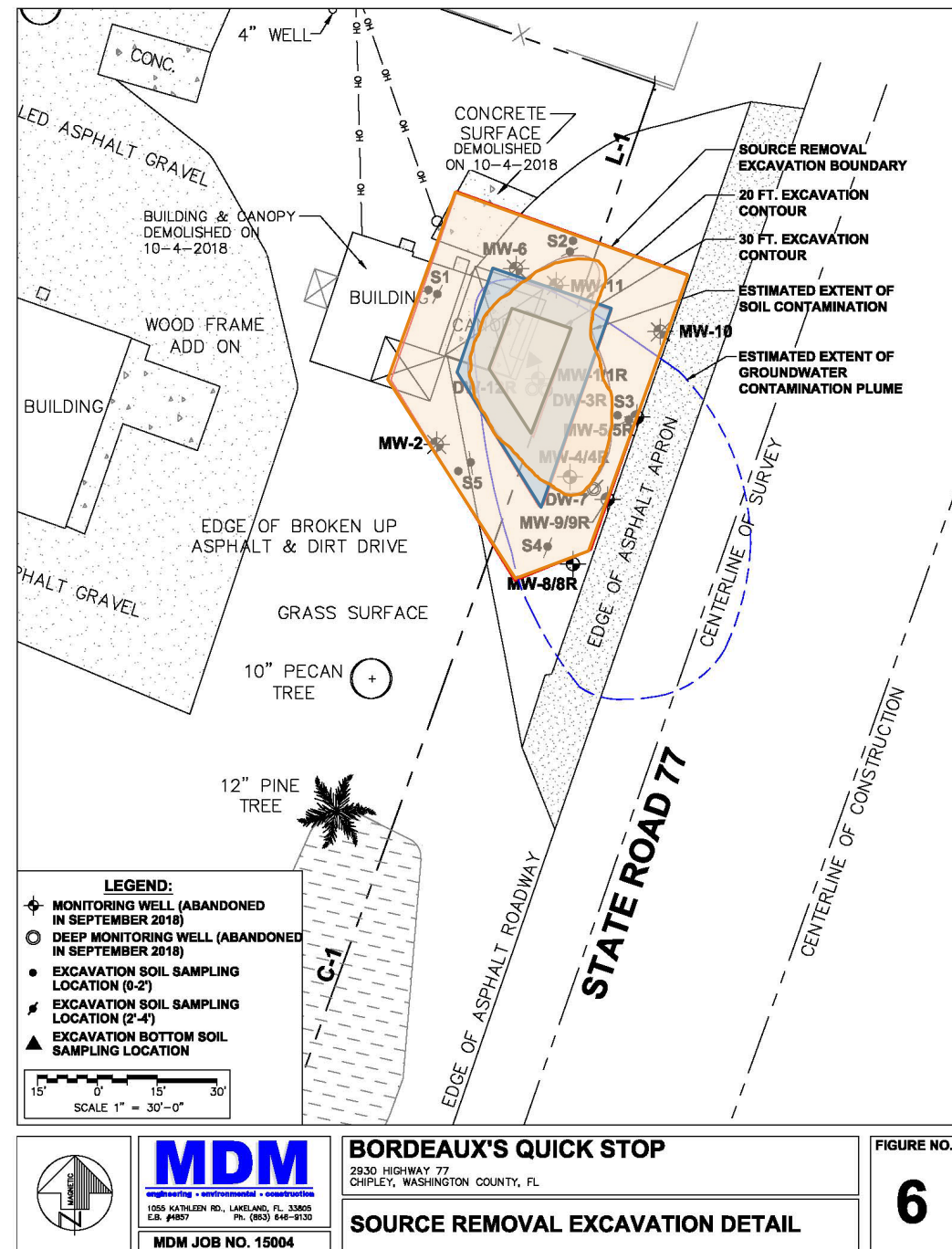
67/8840849 – Bordeaux's Quick Stop

- ISR recommended due to FDOT lane expansion
- Excavation was suggested to remove contaminated soil



67/8840849 – Bordeaux's Quick Stop

- Building and canopy were demolished during source removal
- Additional site assessment completed after ISR
- SRCO issued 02/23/2023



Why Are ISRPs Important?

ISRPs are an opportunity to expedite controlling the human health risk of petroleum contamination

- ISRPs allow us to step in before the problem is out of hand.
 - As site managers and professionals, we can look at sites that are starting to spread laterally or vertically and say that something needs to be done before we finish assessment.
- There are times when contamination is not easily accessible to be assessed or remediated.
 - ISRPs allow us to coordinate cleanup efforts with site redevelopment or road expansion to achieve closure on a compressed timeline that would otherwise not be possible.

Questions?

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