

## Site Characterization Screening (SCS)

### Q & A

March 15, 2013

Question: The RA Cost Estimate for SRCO and the NFAC are identical in the Final SCS Report, is this ok? The logic for this was that with the plume going off-site and being greater than ¼ acre, it does not qualify for NFAC.

Answer: If the 2 estimates are the same it is often due to a misunderstanding of what the NFAC [also called conditional closure, Risk Management Options Level II (RMO II)] Estimate should represent. The NFAC Estimate is for the most cost-effective conditional closure (i.e. cost to remediate an off-site soil plume, or institute necessary engineering controls). Many sites already qualify for NFAC and the cost estimate is simply the “<\$10,000” option to cover the survey and paperwork to obtain the NFAC. If groundwater monitoring would need to be conducted to demonstrate the groundwater plume is stable or shrinking or if paving would be required to be installed as an engineering control, then this would likely increase the NFAC cost estimate to the next higher cost ranges (\$10,000 - \$25,000 or \$25,000 - \$50,000). For contamination that is not confined to the site property boundaries, if the plume is greater than ¼ acre and/or is expanding, or if there is free product present, the NFAC estimate needs to be revised upward based on the minimum amount of work required to achieve the NFAC. Often times the minimal amount of work needed to achieve the NFAC is considerably less than reducing the on-site and off-site contaminant concentrations to less than the cleanup target levels.

When the SCS Report lists identical costs estimates for SRCO and NFAC, always check the text of the document for the discussion of the generalized breakdown of the SRCO and NFAC cost estimates. If the text does not contain this discussion, request it be submitted by the consultant as it is required by Step 4 of the SCS Guidance:

#### **“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.”

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**Question:** On the Final Report, the consultant has the SRCO and NFAC Cost Estimates the same. When I talked to him he said NFAC is not an option on this site. The property owner has a home on the property and she lives there. She has the home and property up for sale and the contamination is hindering the sale of the property, she needs eventual SRCO for this site. I think we should have left that box blank. In this case should we put “not an Option, or N/A” in the box for NFAC cost estimate?

**Answer:** We need the NFAC cost estimate for all sites that do not qualify for an SRCO. We are not saying we will pursue the NFAC for any site. However we are gathering the data on each site as part of this screening effort. The need for this NFAC Cost Estimate is not affected by personal plans or a desire to follow through with an SRCO. The consultant needs to include an estimate for the most cost-effective way to reach NFAC, even if we do not intend to pursue that option.

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**Question:** The consultant called and told me she found a potable well just downgradient of the site that was not included in the DOH survey in the Scoring Package. Should I sample the well?

**Answer:** An impacted potable well can indicate a potential Imminent Threat (IT). The BPSS should be notified as soon as possible when a file review or field work uncovers a potential IT situation. BPSS site managers should notify the IT Coordinator, Jeff Priddle, by email at [jeff.priddle@dep.state.fl.us](mailto:jeff.priddle@dep.state.fl.us) (and cc: Diane Pickett at [diane.pickett@dep.state.fl.us](mailto:diane.pickett@dep.state.fl.us)). Based on email responses from Jeff and/or Diane, they may have DOH sample the potable well, or if there is an open work order, scope the consultant to perform additional work to collect the necessary data to evaluate if IT conditions exist.

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**Question:** Field work has been completed and soils > CTLs and GW data are not available. The consultant is calling asking if we want to run SPLP on the exceedances. Soil data is coming from the lab first, so we need to decide if SPLP needs to be run before the soil's holding time expires, but we do not have time to get the GW data.

**Answer:** Under this scenario we have to make a judgment call on whether to run the extractions. Err on the side of running the SPLP, unless the site is grossly contaminated. There should still be some judgment used, however the consultants need to be working with the labs on what needs to be done to get the GW data along with the soil data.

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**Question:** I just received my first SCS final deliverable report. What do I do with the information on the SCS Information Worksheet?

**Answer:** A STCM database has been constructed to allow entry of this information by the BPSS site manager (or designee). Please note that the consultant completes the Historical Summary Form and turns it in with the proposal before any work is done. The consultant fills out the SCS Information Worksheet (the one that includes the RA Cost Estimates) along with the SCS Final Report after all the work has been completed. Also, if there are any IT indicators, we prefer to investigate it before the Final SCS Report is submitted, however if the IT Indicator Workbook indicates a potential IT situation that has not been investigated yet, forward the information by email to Jeff Priddle at [jeff.priddle@dep.state.fl.us](mailto:jeff.priddle@dep.state.fl.us) (and cc: Diane Pickett at [diane.pickett@dep.state.fl.us](mailto:diane.pickett@dep.state.fl.us))

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Question: Screening of this site found an exceedence of MTBE that was not previously documented. The current score is 45 but the score should be 46 due to the MTBE. Should I do something to get the site rescored?

Answer: The BPSS will find those with a database query so there is no need to report it. However, if during the SCS process it is determined the score needs to be changed for another reason, go through the normal process of notifying Jeff Priddle by email at [jeff.priddle@dep.state.fl.us](mailto:jeff.priddle@dep.state.fl.us) (and cc: Diane Pickett at [diane.pickett@dep.state.fl.us](mailto:diane.pickett@dep.state.fl.us)).

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Question: When is a hand installed well appropriate?

Answer: When performing a Ch 62-770 full assessment, the default has always been to install “conventional” wells finished to the surface. However, for the purposes of Screening a site, there are other options that are often more appropriate when considering that the collection of groundwater samples are meant to screen a site at one point in time instead of monitoring a plume over a long time period of observation. A determination needs to be made for each site as to the most cost effective approach for obtaining the groundwater analytical data for the screening.

When designing a site-specific scope of work, the details and quality of the well construction should be considered in addition to what the use of the data will be (for example closure or to estimate the extent of a plume), the suspected lithology of the site, and the estimated depth to water. In general, a hand installed well is appropriate if the well will be installed as a temporary (one-time sampled) well, the depth of the well will be less than or equal to 10 feet, and the lithology will allow the installation of the well (refusal will not be an issue and tight clays will not prevent the temporary well from being sampled right after the well is installed).

For some sites a rapid screening with water grab samples is sufficient to quickly collect general information about the extent of contamination, for other sites (especially if there are indications the site might qualify for SRCO) taking the time to install “temporary” wells with proper screen construction and purging might be more cost-effective and efficient. Even if the depth to water is shallow at a site, hand installed temporary wells may not be the most cost effective approach if historical groundwater analytical data do not exist for the site. A direct-push rig could be used more cost effectively to install one sand-packed screened well (temporary or permanent) in each eligible source area and then be used to rapidly obtain temporary groundwater grab samples to provide an estimate of the horizontal extent of the plume. Please see Attachment A of the SCS Guidance Document for information on use and installation of non-permanent hand-wells (the term temporary wells was used in the document however it is often poorly defined in common usage).

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Question: How do I build up costs for a hand installed well on the template?

Answer:

- If a hand-well will be installed as a “stand-alone” installation and not combined with a boring, allow:
  - “Well Install (C11)”, plus
  - “Well Sampling with Water Level (C25 or 26)”
- For most sites, a hand-well will be installed at the same location where a soil boring is being installed. In this case, do not “double-dip” on the scope of work. (C11) covers the installation for the boring and the well.
  - For example, for a site with 2 tank pits plus a separate dispenser island where the appropriate scope of work is 10 soil borings, 3 of which will be converted into hand wells, the template should allow:
    - Seven of “SB for Soil Screening or Piezometer Install (C5 or 6)”, plus
    - Three of “Well Install (C11)”, plus
    - Three of “Well Sampling with Water Level (C25 or 26)”
- If a groundwater grab sample is being collected from a boring then well sampling costs are not scoped as purging is not required.

Question: I keep having delays because it is hard to schedule the pre-proposal telecons. Are these still required?

Answer: Pre-proposal telecons are no longer required, they are optional. Instead of requiring the telecon, we recommend a “Conceptual Plan”. When a consultant is assigned an SCS site, they will be required to submit a proposal within 30 days of the date of the notification. It is highly recommended that the consultant present a Conceptual Plan (either by email, meeting, or phone) before the proposal is put together. A Conceptual Plan should indicate whether monitoring wells currently exist at the site and present the general scope of work that the consultant recommends. The Conceptual Plan does not need to include specific details such as quotes or templates.

Question: The well vaults at this site are in disrepair, missing the vault covers, and are a tripping hazard. Should I do a VCO to my SCS work order to fix the problem?

Answer: The SCS funds are not to be used for general site “housekeeping” or to fix imperfections in remedial equipment or monitoring wells. We are only taking a snapshot of the site and there is no point making repairs to a site that will remain on the waiting list for remediation funding. However, there are a few situations where some basic repair work can be authorized.

1. If a vault or monitoring well is creating a safety hazard, perform the minimum amount of work necessary to eliminate the safety hazard on a case-by-case basis. Do not do any repair that is not necessary to eliminate a safety hazard.
2. If a monitoring well cannot be sampled in its current condition but is not a safety hazard, perform only the repairs required to allow completion of SCS sampling.

Question: Do I screen sites that have a SRFA?

Answer:

1. For sites that have a 100% DEP cost share, yes.

2. For SRFA sites with other cost share amounts or being negotiated, contact the SRFA Team ([Rebecca.lockenbach@dep.state.fl.us](mailto:Rebecca.lockenbach@dep.state.fl.us)) to work out the appropriateness of completing the Screening and the cost share amount to apply to the SCS template. We want to proceed with having the SCS Worksheet completed for all eligible discharges at sites below funding range that are not currently funded. For non-SRFA sites you need to simply determine if the site needs field work as part of the work order or not, and if so how much. But for the SRFA sites you also have to work with the SRFA Team to:
  - a. make sure there is nothing in the SRFA that would make it inappropriate for screening (for example if it is being funded out of priority score order),
  - b. figure out if you need to apply a cost share to the SCS work order, and
  - c. determine whether it is necessary for a consultant to perform field work for screening, and if not whether a consultant should be tasked thru a work order to compile the SCS Information Worksheet or the SRFA Team should simply fill it out themselves based on their knowledge of the eligible discharge.
3. For sites that have an ineligible discharge as well as an eligible discharge, but SRFA discussions have not started yet, the Site Manager will proceed with screening the eligible discharge(s) just like our other SCS sites, where we will sort the eligible discharges into buckets and collect the SCS Information Worksheet data. Occasionally for these mixed sites, it might be impossible to estimate the extent of the eligible discharge due to the extent of the ineligible discharge, or there is not adequate data to initiate SRFA negotiations, in which case the SRFA Team will be involved with the decision on how to get screening information for the eligible discharges.

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Question: During the screening of a site, it was sorted into the “Await Cleanup” bucket. However the site qualifies for the Free Product Recovery Initiative (FPRI). What should we do now with the site?

Answer: You have sorted the site into the appropriate bucket and are done with screening. The FPRI is a voluntary program the RP may pursue. The RPs selected consultant can discuss the FPRI option with them.

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Question: I just got assigned a site that has a consent order for a non-program discharge. Do I need to do anything different when I screen the eligible discharge at this site?

Answer: For SCS sites that have a non-program Consent Order, have them checked by Rebecca Robinette (OGC) at [Rebecca.robinette@dep.state.fl.us](mailto:Rebecca.robinette@dep.state.fl.us) to see if there is any reason the CO would obstruct going forward with the SCS funding. In addition, check with the District to see if they have any issues that would affect our ability to perform Screening of the eligible discharge.

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Question: The SCS site was rescored from 44 to 46. Now that this site is within funding range, should I proceed with screening or proceed with regular preapproval?

Answer: For sites that have the score raised to above 45 before the site manager begins screening, skip screening and move directly to regular preapproval. If the score drops once the site is assigned for screening, proceed with screening.

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Question: We are having trouble identifying and finding the correct site owner. The site scores 44 and we will probably be funding this one for cleanup the next time we drop the funding score. Should we just wait until then?

Question: We need off-site access for the screening on this site and have not been able to get off-site access. Should we not screen this site and wait until it comes within funding range so that we don't bother them now and then again when the site is in funding range?

Answer: There is no time like the present! Screening is an important part of the process and we should not postpone the inevitable. Follow the normal procedures for getting proper access starting with the consultant doing their part with phone calls, visits, written correspondence, then follow it up with the FDEP site manager getting involved. For special cases that are much more time consuming and complicated than expected, the consultant can be compensated with extra time on the backup spreadsheet, but this will be rare. After the consultant and site manager have exhausted all their options notify your team leader and Diane Pickett. They will coordinate with DEP's OGC to determine the next course of action.

The vast majority of SCS assessment investigations should not involve obtaining off-site access because the extent of the off-site contamination only needs to be estimated. There has to be a compelling reason (such as Imminent Threat) as to why assessment activities need to be completed off-site for the SCS work.

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Question: The site recently had a pretty complete assessment and it is evident which "bucket" it will be sorted in without additional field work. Is it ok if I do not require a proposal and only scope in a letter report instead of a SCS Report as a final deliverable?

Answer: Always allow Proposal Prep and File Review along with the Report, even if no field work is necessary (unless the consultant states they choose to not submit a proposal). The level of effort to complete the various parts of the Final Deliverable, including the RA Cost Estimate, were considered when the decision was made to do this. The final deliverable in STCM for an SCS work order will always be the SCS Report. However, if no field work is needed and a Final Report will be submitted based on only a file review, the workbook template scope will be the General Report (H2) for the purpose of determining the deliverable cost.

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Question: The consultant did SCS field work then submitted a Final SCS Report recommending another quarterly sampling event to potentially qualify for closure. The Invoice was submitted a few days later for all the costs including the final report and retainage. So should I approve this deliverable and pay the invoice, then create a new work order for the sampling and possibly well abandonment?

Answer: The consultant should not submit the Final Report until they discuss the findings of field work with the site manager. We have seen Final Reports submitted when the site was clean and all we needed to obtain an SRCO was another quarter of monitoring and/or well abandonment. The monitoring and well abandonment should have been included in the work order as an optional contingent event, or as a VCO before the report is submitted. The Work Order should include language requiring the site manager be contacted prior to submittal of the

Final SCS Report in order to discuss findings and the potential for additional work. The goal is to get the screening done with one Work Order; however there are cases where another Work Order needs to be generated to finish the screening.

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Question: The last time work was completed at the site there was a mixed plume of petroleum and solvents. How much delineation of the solvent plume should be included in the SCS Work Order?

Answer: Absolutely none! Do not sample for parameters outside of the Petroleum COCs. We are screening sites for the eligible petroleum contamination only. It is sufficient to analyze for just BTEX and PAHs if the discharge is known to have been from a gasoline source and no other petroleum COCs have been previously identified in excess of the CTLs at the site. Also analyze for Lead and EDB if the tanks were in place before the mid 1980's. BTEX/MTBE, PAHs, and TRPHs should be run if the discharge is known to have been from the Kerosene group or you are unsure if the discharge originated from a gasoline or Kerosene group source. If EDC, isopropylbenzene, or trimethylbenzenes have been previously detected at the site in excess of the groundwater CTLs, then it will be necessary to analyze the VOC samples for these additional COCs before a determination can be made as to whether closure of the discharge is applicable; however, the laboratory should be instructed to only report the BTEX/MTBE, isopropylbenzene, trimethylbenzenes, and/or EDC concentrations on the laboratory report and not the full scan of EPA Method 8260 contaminants.

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Question: I have completed the screening on my PCPP eligible SCS site. Do I need to notify anyone regarding the Ceiling?

Answer: Please notify Mike Bland via email at [Mike.bland@dep.state.fl.us](mailto:Mike.bland@dep.state.fl.us) and he will update the PCPP information in STCM.

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Question: How do I fund work orders and enter SCS data for sites with more than one eligible discharge?

Answer: The SCS work is aimed at determining the characteristics of the site. Although we need to investigate all eligible discharges and should grant SRCOs to discharges that qualify, do not separate the information into individual discharges for the purpose of completing the SCS Info Worksheet, Scope all the work under one WO or TA. If a site has multiple discharges, select one discharge for funding purposes:

- a. If one of the discharges does not have a funding Cap (EDI or ATRP eligible), write the Work Order under that discharge.
- b. If all the discharges have funding caps, write the SCS WO under the discharge that is the major contributor or will be driving the cleanup.

If all the discharges have funding caps and it is not clear if a specific discharge will be driving the cleanup, please email Diane Pickett.

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Question: I have a site that had previously documented contamination but after a field event of soil and groundwater sampling the site is clean. I need another quarterly sampling event to qualify for closure. How do I fill out the SCS Information Worksheet where it asks questions about Plume Characteristics and RA Cost Estimates?

Answer: The Worksheet should not be filled out until the Screening process is complete. In this case 2 field events are needed to properly screen the site. We want to be very thorough in our evaluation of possible site closures and if our initial screening event indicates the site might qualify for closure with an additional field event for more sampling, then that work should be scoped into a VCO (or new work order if necessary). The SCS Information Worksheet should not be completed until the Screening work is finished. And if the site qualifies for SRCO, the Plume Characteristics and RA Cost Estimate part of the SCS Information Worksheet does not need to be filled out.

Question: I have a PCPP site that, based on historical information and the number of years the site has had to naturally attenuate, will very likely qualify for closure based on Screening the site. I understand the PCPP cost share is not required for Screening, but if the Screening demonstrates the site qualifies for an SRCO, does the owner need to pay for well abandonment?

Answer: No, if a site is funded for Screening and qualifies for SRCO, the BPSS pays for well abandonment as part of the Screening process.

Question: If I assess a site with soil and groundwater samples from all the appropriate areas and the samples are all below CTLs, do I need to go back 3 months later and monitor the groundwater one more time before I can get a closure?

Answer: That depends on the nature of the reported discharge and what contamination has been documented. Early on in the EDI program BPSS made sites eligible for funding even if they did not have documented and confirmed contamination. For example, some of the old EDI sites only documented an odor in a monitoring well, or an “inventory discrepancy”, or elevated OVA, however contamination was never confirmed by lab analyses. So for a site that never had contamination verified by lab data, if proper samples are now collected and lab analyses demonstrate the COCs are less than CTLs, there is no need to wait 3 months and collect a second round of groundwater samples to confirm the site is clean. However, if historical data has shown contamination through lab analyses, then two clean consecutive groundwater sampling events (the consecutive sampling events do not have to be quarterly and can be separated by several years) would be required to qualify for closure.

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## Archived SCS Q & A below

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May 18, 2012

Question: How do I know when to stop collecting field data and submit the SCS report?

Answer: That is a site-specific determination. For the Screening process we are not completing a Chapter 62-770 assessment which requires that we **determine** the horizontal and vertical extent of contamination, for Screening we are **estimating** the horizontal and vertical extent of contamination for the purpose of sorting the site into one of the 4 “bucket” categories. Some examples:

- We do not need clean monitoring wells to define the outside edges of contamination, we can use concentration gradients and knowledge of local lithology and hydrology to estimate the extent of contamination (ie, with dashed contour lines).
- We do not need off-site wells to prove a plume goes off-site if the data we do have indicates the plume likely does go off-site. If there are existing off-site monitoring wells that can be sampled to better estimate the extent of the groundwater contamination, then a determination might be made to sample some of the wells for the Screening, but we should not be installing off-site wells for the Screening unless there is a specific need to for sites where we are pursuing closure for the discharge.
- For most sites, we do not need to install deep wells to define the vertical extent of contamination for the Screening. However, if the site has high concentrations of groundwater contamination detected in the shallow monitoring wells located in the source area and is in an area where numerous shallow potable wells are located in close proximity and downgradient of the discharge, a deep well may need to be installed and sampled for the Screening.

Question: We have a site is a CSX railroad site that we just got assigned to screen. We did an imminent threat dig for free product going under the road and entering a ditch, including removing and replacing a section of the road. They are working on a large offsite solvent plume with the district, IW not WCU due to original IW discharge permit. I can easily put this into the bucket of needs more cleanup when the site score comes up. However, this does not get us a cost to cleanup or a cost to cleanup with conditions. I am not sure how much work we need to do here.

Answer: The primary goal of the Screening is to sort the site into one of the 4 buckets (Imminent Threat, Closure, Long-Term Natural Attenuation Monitoring, or Parking). A secondary goal of the Screening is to obtain enough information about the site in order to characterize what petroleum contaminants of concern are detected in the soil and groundwater, the **estimated** soil and groundwater plume characteristics, the depth to water, and the dominant lithologies at the site. We only need enough site field data to reach these goals and we anticipate that the primary and secondary goals of the Screening can be achieved on many of our sites without doing any additional field work or only minimal field work. If the file review is sufficient to attain the primary goals of the Screening, then the consultant gets the file review, proposal prep, and a Letter Report (instead of the H17 SCS Report because no field work was performed). For this specific site we don't need to complete additional field work for the

Screening because we have enough information to sort it into the “Parked” bucket now, we know what petroleum contaminants of concern are present in the soil and groundwater, we have a large plume that is migrating off-site, and it is not Imminent Threat. The consultant might propose they need additional assessment to come up with a more accurate RA Estimate, but we should not perform field work just to come up with an RA Estimate. They need to base their estimates on the info that is available.

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Question: Regarding sites that will qualify for closure; who will be responsible for the abandonment of site wells? Since these wells were more than likely installed with State funds, will the SRC Order be issued with or without well abandonment? Will well abandonment be included in (a) the Site Characterization Screening work scope as a VCO, (b) as issued under a separate Work Order generated with Funding Eligibility of Well Abandonment, or (c) will the RP be responsible for abandoning the wells?

Answer: We will do what we usually do. Once we determine the site is clean we do a VCO (or another SCS WO if it's too late to add a VCO to the existing WO) to pay for the well abandonment, then issue the SRCO after we get the well abandonment report.

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Question: How and when does the FDEP intend on collecting the deductible from an RP or Property Owner during site closure? I assume if the Site Characterization Screening work scope is less than the deductible, only the amount spent by the FDEP will be collected?

Answer: We will only collect the deductible if the site qualifies for closure or will be funded by Imminent Threat. Once we have determined the site meets the closure requirements and have tasked the consultant to abandon the wells, we contact York to collect the deductible, and York will inform us when it has been paid so we can send out the SRCO. And we only collect up to the amount we spent. For example, for a PLIRP site with a \$10,000 deductible, if we spend \$6,000 in a work order to prove the site qualifies for an SRCO and to abandon the wells, then we will only collect \$6,000 of the deductible.

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Question: In the soils at this facility the vadose zone is clean, however the smear zone is not, does the department want smear zone soil information on that sheet. DTW varies from 6-9', soil samples for lab analyses were collected when the depth to water was 6' bls and a vadose soil sample was below SCTLs but a saturated soil sample collected at 7.5' exceeded SCTLs.

Answer: There is a difference between whether there actually is vadose soil contamination and whether we happen to have the appropriate soil samples with lab verification at the time of the Screening activities to make that determination. In the example you listed, the 7.5' soil lab sample collected from below the water table at the time of the sampling event does not qualify as a vadose zone soil lab sample per Ch 62-770. The soil CTLs only apply to soil lab samples collected from the unsaturated (vadose) zone at the time of the sampling event. In order to attain an SRCO for a site, all of the soil within the vadose zone has to be less than the soil CTLs. However, the saturated smear zone often serves as a continuing leaching issue contaminating the groundwater and has to be treated along with the groundwater during the remediation phase. If there is significant soil contamination within the smear zone and a significant groundwater fluctuation at the site, then this will likely increase the RA cost estimate. For the purpose of

filling out the Site Screening Worksheet, use best judgment to decide if you believe there is soil contamination in the vadose zone at least seasonally when the water table is low and do not perform additional field work for the Screening for the sole purpose to verify if soil contamination is present in the vadose part of the smear zone in excess of the soil CTLs. Even if we don't have a soil sample collected slightly above the water table at this time, use knowledge of the water table fluctuations, previous soil lab results, and the fact that groundwater contamination is present to come up with an educated opinion as to whether there is vadose contamination or not. Part of the purpose of the Screening is to estimate the extent of the soil and groundwater plumes, and based on these estimates arrive at a rough cost estimate to achieve closure. Therefore, if you have a saturated soil lab sample that was collected from the smear zone when the water table was high, and the sample exceeds the soil CTLs, you should consider calling it soil contamination for Screening purposes and identify the soil contaminants of concern and plume characteristics on the Site Screening Worksheet.

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Question: I have soil and groundwater contamination at this site. I know the general extent of the soil contamination, but have not yet defined the groundwater extent in the downgradient direction because there is a structure in the way that prohibits the placement of a monitoring well. From the groundwater concentration data I do have, and the lithology and hydrology of other sites nearby, I believe the plume has migrated beyond the property boundary. Hwy 90 is downgradient and is 4 lanes with a median. Should I install a MW across Hwy 90 as part of this Screening process? And if I do and the MW is clean it still doesn't prove the plume does not go off-site. How do I fill out the part on the SCS Worksheet that asks if the plume is contained on-site if I can't prove it is not.

Answer: Unless we are trying to obtain an SRCO for a site (in which case we need to follow Ch. 62-770) the Screening process is not intended to be a thorough evaluation of the complete extent of the soil and groundwater plumes. You are not trying to prove anything as we normally do with a Ch 62-770 full assessment, you are estimating. There can often be subjectivity in the interpretation of the horizontal and vertical extent of contamination and a best "educated guess" should be given to the questions on the SCS Worksheet using all information available. In the case above it sounds like you have already studied the plume concentration gradient and the local lithology and hydrology to state that is it your opinion that the plume likely has migrated off-site. That "educated guess" is good enough for this screening process.

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Question: Is a PLS required when Screening a site?

Answer: No, not unless there is a unique, site-specific need that is integral to site rehabilitation. Even if a site qualifies for closure, it must be demonstrated how a PLS is integral to site closure before it will be funded.

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Question: Why isn't BPSS paying for Initial Map & Table Generation (H24) on the template?

Answer: Site Screening is just a one-time snapshot of the site and we do not need or want to spend money during the Screening of a site on creating cumulative tables or generating a new CAD map base. For sites where the Screening indicates the site will be placed back on the waiting list based on its score, the maps supplied in the SCS Report do not have to be newly

created on drafting software, any new data collected during the screening process can be presented on pre-existing or hand-drawn site maps. Any tables that need to be included in the SCS Report to present new work performed at the site (such as the Monitoring Well Construction Table or the soil or groundwater tables) do not need to be cumulative. If the site does not qualify for imminent threat or closure after the Screening is completed, then all funding under the Screening will cease and the site will be placed on the waiting list until the site becomes eligible for funding based on its priority ranking score. The cumulative tables and the new CAD base map can be created at a later date when the site is eligible for funding based on its score and the data obtained during the Screening can be added to the tables at that time. However, if the site qualifies for an SRCO, a higher level of professional deliverable is required and the BPSS will require a properly formatted site map and cumulative soil and groundwater analytical tables, but these sites do not need any of the Plume Characteristics, RA Cost Estimate, or contaminants listed on the SCS Worksheet (all that is needed is lithology and depth-to-water). So BPSS is paying a standard amount for a level of effort that varies slightly based on the outcome of the Screening.

As far as what the BPSS is paying for in reporting costs, to simplify the paperwork process, BPSS decided to pay for the Screening final deliverable as a lump sum as H17. It was decided to not use the existing H1 reporting costs because many of the sites would only need a small amount of field work completed and therefore H1 was not sufficient.

/ddp