

Institutional/Engineering Controls to Qualify for a Conditional Site Rehabilitation Closure Order (CSRCO) under RMO II* when SCTLs are Exceeded**

Scenario	Scenario (Direct Exposure)	Scenario (Leachate-based)	Does Property Qualify for and Desire a C/I Use Restriction (Y/N)	Deed Restriction (Restrictive Covenant) to keep property/ site in C/I use	Cap-type/ impermeable cover EC (e.g. asphalt) with Deed Restriction to maintain EC.	Install 2 feet of clean soil (EC) above contaminated soil with Deed Restriction to maintain EC.	Deed Restriction to maintain existing 2 feet of soil/cover above contaminated soil	Demonstrate Contaminants will not leach at concentrations greater than GCTLs (As-Is).	Deed Restriction to properly dispose of contaminated soil if ever excavated
1	Top 2 feet: > DE Res. SCTLs; < DE C/I SCTLs	1a ALL soils: < Leachability-based SCTLs	Y N ¹	R NA or ND	NA O	NA O	NA	NA	M
	Beyond 2 feet: > DE Res. SCTLs; < DE C/I SCTLs	1b ANY soils: > Leachability-based SCTLs	Y N	R NA or ND	O ²	NA O ³	NA	O ^{3,6} NA	M
2	Top 2 feet: < DE Res. SCTLs	2a ALL soils: < Leachability-based SCTLs	Y N	R NA or ND	NA O	NA O	NA	NA	M
	Beyond 2 feet: > DE Res. SCTLs; < DE C/I SCTLs	2b ANY soils: > Leachability-based SCTLs	Y N	R NA or ND	O ²	NA O ³	NA	O ^{3,6} NA	M
3	Top 2 feet: > DE Res. SCTLs; < DE C/I SCTLs	3a ALL soils: < Leachability-based SCTLs	Y N	R NA or ND	O	NA O	O NA	NA	M ⁴
	Beyond 2 feet: > DE C/I SCTLs	3b ANY soils: > Leachability-based SCTLs	Y N	R NA or ND	O ²	NA O ³	O ³ NA	NA	M ⁴
4	Top 2 feet: < DE Res. SCTLs	4a ALL soils: < Leachability-based SCTLs	Does not affect required EC		O	NA	O	NA	M ⁴
	Beyond 2 feet: > DE C/I SCTLs	4b ANY soils: > Leachability-based SCTLs	Does not affect required EC		O ²	NA	O ³	NA	M ⁴
5	Top 2 feet: > DE C/I SCTLs	5a ALL soils: < Leachability-based SCTLs	Does not affect required EC		O	O	NA	NA	M ⁴
	Beyond 2 feet: > DE Res. SCTLs; < DE C/I SCTLs	5b ANY soils: > Leachability-based SCTLs	Does not affect required EC		O ²	O ³	NA	NA	M ⁴
6	Top 2 feet: > DE C/I SCTLs	6a ALL soils: < Leachability-based SCTLs	Does not affect required EC		O	O	NA	NA	M ⁴
	Beyond 2 feet: > DE C/I SCTLs	6b ANY soils: > Leachability-based SCTLs	Does not affect required EC		O ²	O ³	NA	NA	M ⁴
7	Top 2 feet: < DE Res. SCTLs Beyond 2 feet: < DE Res. SCTLs	7 ANY soils: > Leachability-based SCTLs	Does not affect required EC		O ²	NA	NA	O ^{3,6}	M ⁵
8	Use of Alternative DE SCTLs (Risk Based) per Chapter 62-780.650 F.A.C. (i.e. RMO III)		Institutional Control(s) required to keep site use consistent with parameters used to justify alternative SCTLs.					M	

DE = Direct Exposure
 Res. = Residential; C/I = Commercial/Industrial
 SCTLs = Soil Cleanup Target Levels
 EC = Engineering Control
 Deed Restriction = Restrictive Covenant (RC)

R = Required to use listed Options for scenario.
 M = Mandatory for a Conditional SRCO.
 O = One of two options for a Conditional SRCO.
 NA = Not Applicable
 ND = Not Desired

* For a site to qualify under RMO II, the extent of SCTL exceedances must be delineated and the SCTLs for RMO I must be met at the source property boundaries.

** In all cases, if the only SCTL exceeded is for TRPH, then fractionation may be used to demonstrate that site specific fractions of TRPHs do not exceed applicable SCTLs.

Notes

- The property either does not qualify for a C/I Use Deed Restriction or, qualifies but deed restriction not desired.
- If Leachability-based SCTLs are exceeded, the effectiveness of the impermeable cover must be demonstrated by a year of quarterly groundwater monitoring data.
- This is only an option if Chapter Section 62-780.680(1)(b)2.f., F.A.C. is being used for closure conditions. In this case, contaminated soils have been subject to infiltration throughout the entire unsaturated zone for a minimum of two (2) years and it has been subsequently demonstrated by a minimum of one year of groundwater monitoring data (quarterly during 3rd year) that contaminants will not leach into the groundwater at concentrations that exceed the appropriate GCTLs and/or SWCTLs.
- Deed restriction will also have to stipulate that if subterranean construction activities are ever implemented on the site, construction workers will be notified that contamination exists and that they need to use proper protective equipment based on OSHA requirements.
- If SPLP is used or alternative Leachability-based SCTLs are calculated based on soil properties, and these criteria met, there are no mandatory deed restrictions with respect to disposal of excavated soils.
- This option may also be implemented by using SPLP or alternative Leachability-based SCTLs calculated based on soil properties.