



Florida Department of Environmental Protection

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December 15, 2010

Ms. Pat T. Maher
FPL - JES/JB
700 Universe Blvd.
Juno Beach, Florida 33408

Subject: Approval of Closure Assessment Sampling Plan for Number 6 Fuel Oil Storage Tanks

Dear Ms. Maher:

The Bureau of Petroleum Storage Systems has reviewed the information package that was received on July 19, 2010 on FPL's Final Closure Assessment Document for #6 Oil Storage Tanks. The document addresses the closure assessment procedures for #6 oil storage tanks so that equivalent procedures to those contained in the Department's "Storage Tank System Closure Assessment Requirements," April, 1998 are met. As provided in Section J of the Department's closure assessment document, approval for other petroleum and hazardous substances is allowed. Therefore, the attached closure assessment procedure is approved as an acceptable closure assessment sampling and analysis procedure for #6 oil storage tank closures at any FPL facility in Florida.

Thank you for your help coordinating the submission of this document. Any questions regarding technical issues with the #6 oil closure assessment procedure requirements should be directed to me at (850)245-8845.

Sincerely,

John P. Svec, PE
Storage Tank Regulation Section

JPS/jps

Enclosed: Final Closure Assessment Protocol for Aboveground Storage Tank Systems (ASTs) Containing #6 Oil.

Ec: Pat T. Maher - FPL - JES/JB. - Pat.T.Maher@fpl.com
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Final Closure Assessment Protocol for Aboveground Storage Tank Systems (ASTs)
Containing #6 Oil

High viscosity pollutants such as No. 6 fuel oil are relatively immobile in the environment and any impacts are typically very localized and limited to surficial soils. Based on the characteristics of high viscosity pollutants, FPL is proposing the following procedures for closure sampling and evaluation of #6 oil (a high viscosity pollutant).

1. Conduct a visual inspection around the perimeter of the tank to determine the presence or absence of soil staining or discoloration indicative of a release of high viscosity pollutants.
2. If no visual staining or discoloration is observed, borings/test trenching will be collected at approximately 50 ft intervals. Borings/test trenching, whenever possible, will be located in proximity to manways, nozzles, other shell penetrations, floor sumps, etc. If the tank has cathodic protection, any samples will be collected between 7.5 to 10 ft. from the edge of the tank. If the tank does not have cathodic protection, any soil samples will be collected immediately adjacent to the apron of the tank. For aboveground piping, FPL will collect soil samples at 50 ft intervals for straight piping and additional samples where there are 90 degree bends in the piping. At each soil boring/test trenching location, samples will be collected at one foot depths from ground surface to 4 ft.-below land surface (ft-bls), and visually inspected and documented.
3. If stained or discolored soil is encountered indicating that a release of high viscosity pollutants has occurred, such soil and a one foot lateral and vertical buffer will be excavated. There shall be no limitation on the volume of soil that may be excavated so long as such excavation activity complies with the requirements of Rule 62-780.550, F. A. C. After excavation, up to four side wall and one bottom soil samples will be collected for TRPH analysis and the Polyaromatic Hydrocarbons (PAHs) applicable to Heavy Fuel Oil. Based on the FDEP approved *Heavy Fuel Oil Discharge Response Actions* protocol, these .PAH constituents associated with #6 oil are phenanthrene, anthracene, flouranthene, benzo (a) anthracene, benzo (b) flouranthene, benzo (k) flouranthene, benzo (a) pyrene, chrysene and indeno (1,2,3-cd) pyrene. The location of the excavation and confirmatory samples will be documented and any disposal manifests maintained.
4. In the event that TRPH in soil is detected above the TRPH Soil Cleanup Target Levels specified in Table II of Chapter 62-777, F. A.C., TRPH fractionation using the Florida Working Group method will be performed on the sample. If necessary, SPLP analysis may also be performed.
5. If it is determined that a release of high viscosity pollutants may have come into contact with groundwater, FPL will install a temporary groundwater monitoring well or wells as appropriate and a groundwater sample or samples will be collected for TRPH analysis. Also, if SPLP analysis is performed in accordance with Paragraph 4 and the results indicate that leaching of TRPH is occurring above the TRPH Groundwater Cleanup Target Level specified in Table I of Chapter 62-777, F.A.C., or exceeds the leachability concentrations of Calculated SCTLs for TRPH Fractions (Table C-5 of the

Technical Report: Development of Cleanup Target Levels for Chapter 62-777), FPL will install a temporary groundwater monitoring well and collect and analyze a groundwater sample for TRPH.

6. A closure assessment report will be generated for each tank within 60 days of receipt of analytical data. This closure assessment report will include a description of site investigation activities, analytical results, photographs of the individual test trench soil profiles, as well as conclusions and recommendations for future activities, if necessary.