

FDEP-approved A-SCTL for BaP and BaP TEQ in Commercial/Industrial Scenarios



Florida Brownfields Association
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A-SCTL for BaP and BaP TEQ



February 2005 – Rule 62-777 FAC Table 2 lists the BaP direct exposure R-SCTL as **0.1 mg/Kg** and the I-SCTL as **0.7 mg/Kg**

July 2018 – on behalf of FDEP, UF evaluates the SCTLs using EPA's age-dependent adjustment factors to account for increased susceptibility of children to mutagenic carcinogens, resulting in an R-SCTL of **1.0 mg/Kg** and an I-SCTL of **3.1 mg/Kg** for BaP

May 2020 – FDEP issues emailed guidance indicating the R-SCTL will remain **0.1 mg/Kg** but would accept the A-SCTL of **3.1 mg/Kg** for BaP in commercial/industrial exposure scenarios

A-SCTL for BaP and BaP TEQ



The use of the A-SCTL of 3.1 mg/Kg for BaP in commercial/industrial exposure scenarios, must be “grandfathered” into site rehabilitation by including the recommendation to FDEP for approval

What’s the point? FDEP did not widely publicize the higher A-SCTL

Why not? Contaminated Media Forum was last active in 2019 for PFAS and promulgating updated SCTL requires a rule revision

Where can I learn more? The FBA’s Legislative, Policy & Technical Committee is publishing a memorandum for distribution to the industry

A-SCTL for BaP and BaP TEQ



Why does it matter to Brownfields? Brownfields sites are usually located in areas with commercial/industrial exposure scenarios

Why use 3.1 mg/Kg instead of 0.7 mg/Kg? If appropriate, will provide a more easily attainable and cost-effective end point to the BSRA for site redevelopment

How do I “grandfather” this A-SCTL into one of my sites? FDEP must approve the use of the A-SCTL for BaP, proposed by the consultant in a technical document such as a SAR, RAP, NAM Plan; or BSRA or permit (Rule 62-780.150(5) FAC)

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<https://ngmdb.usgs.gov/topoview/viewer/>

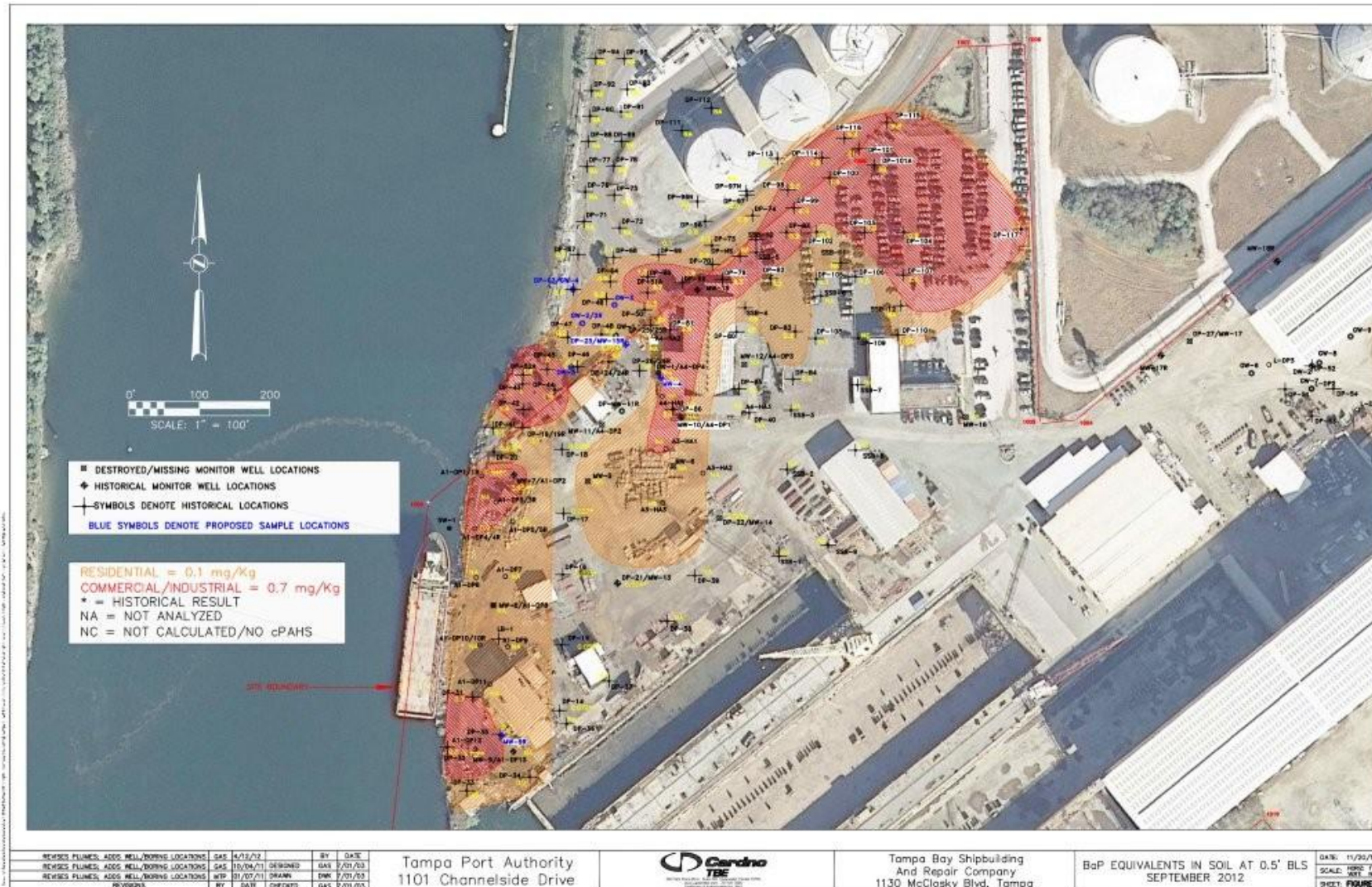


www.tampabayship.com

Case Study: Tampa Bay Shipbuilding and Repair Company Brownfields Site (BF290101002/ERIC_13802)

- Located on Hookers Point, a landform infilled with dredge sediments since the 1920s
- Used as a shipbuilding and repair facility since 1942 during World War II
- Heavy industrial land use at site, adjoining, and surrounding properties
- Diesel-operated vehicles, heavy equipment, and ships with high start-stop cycles
- No “leaking tank of BaP” or “BaP release”, rather a combination of non-point sources over 80 years of anthropogenic inputs

A-SCTL for BaP and BaP TEQ



A-SCTL for BaP and BaP TEQ



BaP (mg/Kg)	BaP TEQ (mg/Kg)
2.8	4.2
8.3	11.8
2.2	3.2
2.7	3.9
0.9	1.3
2.2	3.1
1.7	2.8
1.2	1.7
3.33	5.3
1.09	1.6
1.9	2.8
4.1	6.2
1.9	2.7
2.1	2.9
1.7	2.3
0.9	1.2
2.9	4.2
1.03	1.7
2.4	3.7
0.6	0.9
2.5	3.6
3.1	4.6
0.5	0.7
10.7	9
0.9	1.3
0.6	0.9
1.6	2.4
1.7	2.4
0.8	1.2
1	1.4
2.4	3.4
1.7	2.4
2.3	3.3
0.69	1.1
0.9	1.4
5.6	8
0.6	0.8
0.7	1
11.3	16.7
0.052 U	0.02
0.055 U	0.03
0.053 U	0.03
0.04 U	0.02



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- BaP and BaP TEQ delineation and ISR left at three “hot spot” locations
- Orange highlighted exceeds Rule 62-777 I-SCTL of 0.7 mg/Kg (Table on left)
- FDEP SWD suggested grandfathering in this A-SCTL of 3.1 mg/Kg during an in-person meeting
- Orange highlighting exceeds A-SCTL of 3.1 mg/Kg (Table on right)
- The A-SCTL was grandfathered in by responding to an FDEP comment letter following the in-person meeting
- Delineation achieved, preparing SRCR to bring 24 years of environmental investigation and remediation to risk-based closure

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