



HART Remediation Project, Tampa, FL

HART

Scope of Services:

- Assessment
- Remediation
- AST Compliance
- Regulatory Compliance
- Compliance Reporting
- ISO 14001 Compliance and Certification
- Environmental and Sustainability Management Systems
- Sustainability Planning and Reporting
- Permitting
- Best Management Practices

Overview

NovelEolutions, Inc. (NovelE) is a sub-consultant on this three-year contract with Hillsborough Transit Authority (HART). HART provides planning, financing, acquiring, construction, and operation and maintenance of mass transit facilities, and supplies public transportation assistance to Hillsborough and portions of Pasco County. Liza Grudin, PE, Principal Engineer for NovelE, serves as the Remediation Lead, and Sustainability Lead for the contract providing management and technical support for comprehensive environmental assessment and remediation activities for HART. Advance work planning allows for efficient work products with a reduced environmental footprint. A streamlined life cycle assessment approach is utilized. The contract awarded in 2015 is valued at over \$1.7 million and is the largest procured by HART for environmental services.

Assessment and Remediation

Assessment and remediation activities to date include emergency source removal, soil boring and monitor well installation and abandonment, oil/water separator closure, and free product identification and recovery. Assessment activities have been completed for two discharges since contract inception.



20,000-gallon Diesel ASTs, HART 21st Avenue Maintenance Facility

One of the discharges dates back to October 1995 and is under a regulatory consent order. NovelE provides overall sustainability management of the project developing Work Plans in coordination with the Prime Contractor, Environmental Protection Commission of Hillsborough County (EPCHC), and the client, HART. Cleanup for the discharges is planned during concurrent construction activities funded for FY 2019 and 2020.

Legacy contamination onsite includes discharges eligible for cleanup under the FDEP Petroleum Restoration Program's Inland Protection Trust Fund. Two discharges represent non-eligible releases that are the responsibility of HART. NovelE, in conjunction with the Prime Contractor, completed a historical review of the soil and groundwater assessment in preparation for submittal of a Limited Contamination Assessment Report for a Site Rehabilitation Funding Agreement (SRFA). The SRFA will consider the spending completed by date by HART under the Preapproved Advanced Cleanup Program.



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CNG Compliance Repairs, HART's 21st

AST Compliance

Based on regulatory correspondence from EPCHC, compliance follow-up was required after the initial installation of the diesel generators for Compressed Natural Gas (CNG). NovelE provided oversight for the installation contractors modifications and prepared the documents for compliance within regulatory timeframes and requests. NovelE created new Tank Inspection Forms, provided Tank Inspection training, and worked with Facilities Maintenance staff to implement new procedures to prevent future spills and maintain AST compliance for the facilities ten (10) registered ASTs. Tank inspections were tied to fuel delivery with the Facilities Department and Procurement and Contracts Administration Departments working together to streamline the compliance process.

Regulatory Compliance

Ms. Grudin completed a cumulative site history for HART's 19.34-acre maintenance facility dating back to 1983 identifying discharges and related closures and allowing for identification of "phantom" wells at the site for use in assessment or abandonment. The site history is being utilized to track eligible and non-eligible discharges in coordination with EPCHC and complete a Site Rehabilitation Funding Agreement (SRFA) for future cleanup activities.

One of three primary Areas of Concern was closed via a Site Rehabilitation Completion Order (SRCO) prior to the current contract award. Based on NovelE's comprehensive file review, an error was found on the regulatory document summarizing closure requirements and detailing the conditions of the closure. EPCHC and FDEP corrected the SRCO and issued a revised version.

Ms. Grudin is in the process of reviewing HART-owned properties for compliance with regulatory requirements. HART properties have various forms of ownership and legal responsibilities. Ms. Grudin identifies potential issues through file reviews, interviews and consultation with regulatory agencies, and review of HART's internal files. NovelE staff works directly with HART's Environmental, Facilities Maintenance, and Project Management Office conducting meetings with former consultants, Hillsborough County and the Southwest Florida Water Management District (SWFWMD) as needed to facilitate the process and work on getting each of the properties into regulatory compliance. Additionally, NovelE works with the Prime Contractor on permitting issues and submittals related to the HART properties.



Ruskin Park-N-Ride Stormwater Pond Clearing



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Compliance Reporting, ISO 14001 Compliance, Sustainability Planning and Reporting, BMPs

After a January 2017 discharge of approximately 500 gallons of diesel fuel at the facility, NovelE provided initial consulting for regulatory discharge reporting compliance and emergency source removal activities. NovelE personnel conducted a third-party audit of the discharge leading the interviews, root cause analysis, and compiling the Corrective Action Analysis Report. NovelE is currently working with HART's Maintenance Facilities Department, Environmental Department, and Procurement and Contracts Administration Department to evaluate the corrective actions for implementation. Additionally, NovelE worked with the Procurement and Contracts Administration Department to update the Fuel Delivery Standard Operating Procedure (SOP) and Diesel Fuel Delivery Work Instructions (WIs) documents HART uses routinely to aid in spill prevention.

Ms. Grudin acted as the Team Leader for an in-house Environmental Compliance Audit conducted for the Maintenance Facility including the heavy maintenance, preventative maintenance, and bus washing areas. A comprehensive checklist was utilized for the audit and then reported during HART's ISO 14001 formal annual audit. Since the audits, NovelE has been working directly with HART staff to implement corrective actions related to the Opportunities for Improvement (OFIs) identified. This includes conversion and modification of the existing Waste Management SOP and Spill Response Safety SOP. NovelE prepared "punchlists" outlining Departmental changes and accompanying forms and training documents were prepared for each of the SOPs. Ms. Grudin prepared an Outfall Inspection form utilized to monitor surface water discharges after the January 2017 discharge, new Tank Inspection and RCRA inspection forms, and a Vehicle and Equipment Storage Area inspection form for use by the Facilities Maintenance Department. All documents are prepared in accordance with HART's ISO Compliant Environmental and Sustainability Management System (ESMS).

NovelE updated the existing Stormwater Pollution Prevention Plan as required by HART's MSGP permit for Sector P. Gregory Aumann provides the administrative oversight of the MSGP NPDES permit, monitoring qualified rainfall events and collecting the quarterly visual samples in accordance with the permit. Mr. Aumann is responsible for documenting the quarterly visual samples on the MSGP Quarterly Visual Assessment Form allowing for consistency in sample collection and examination. Ms. Grudin worked with the Prime Contractor to finalize the updated Spill Prevention Control and Countermeasures (SPCC) Plan with the new procedures and controls identified during the audits conducted in 2017.

NovelE worked with the Environmental Program Manager for HART to create an Objectives, Targets and Programs Action Plan for Waste Minimization and Recycling detailing waste management, handling and recycling procedures for the 19.34-acre facility. This included recommendations to decrease hazardous, non-hazardous and solid waste disposal by 30% by 2019; increase recycling to 75% by 2020 to match the statewide recycling goal established by Section 403.7032, Florida Statutes; and change the facilities generator status as defined by Title 40, Chapter I, Part 262, Code of Federal Regulations from Small Quantity Generator (SQG) to Very Small Quantity Generator (VSQG) by 2019.

Bi-monthly Environmental Team meetings are conducted at HART and routine Environmental and Facilities Maintenance combined meetings are held to monitor progress with implementation. NovelE staff use standard HART documents to track progress and upload key regulatory submittals and correspondence directly to the HART SharePoint site.