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To: File

Subject: Tar Removal Work Plan
Weston Solutions, October 19, 2009
Received via email 10/29/09

From: Stu Pearson

Date: November 3, 2009

Comments:

1. 3.1 Pre-Mob.
    a. Permitting through FDEP will be required for this activity.
    b. Considering the crew in 'moon' suits will be working the creek it seems necessary to do a PSA along with other awareness (i.e. Public Meeting, etc.) outreach to inform the public on the activity.
2. 3.1.3 Odor Control - Language should be changed to require daily cover of pile of the piles being built with plastic sheeting and permanent cover (thicker plastic sheeting) for those piles being stored onsite.
3. 3.1.4 Work Staging Area -
    a. For the materials storage area of the site a 6 to 8 inch layer of clean, easily identifiable, material should be placed as a base for the stream excavation. This will prevent contamination of the site with material removed from the stream. It will also elevate the area so that no site drainage issues complicate the site return to its former use.
    b. The materials storage area should be surrounded with silt fencing that is properly installed to separate the internal area from the external area and prevent migration of loose material either direction.
    c. Upon completion of the work and leaving the site, the work plan should include a stabilization phase that will return vegetation to the surface and reduce erosion potential.
4. 3.2.2 Sediment/Tar Removal -
    a. Clearing the streambed of logs may resulting destabilization of the stream banks. This activity should be monitored and destabilization of the banks avoided.
    b. Use of a VAC truck for the sediment will probably result in the draining the excess water out of the load prior to transport. The drainage from the tank will have high turbidity and require a 'silt sack' or similar technique for that discharge prior to release of the water back to the environment.

c. The turbidity management plan should include the use of polymer bricks and polymer saturated loose weave burlap as a control measure. Monitoring of the upstream and downstream turbidity with not more than a 29 NTU difference would be a good control technique to manage the work. Exceeding the NTU limit would require suspension of the work and implementation of additional control measures.

d. Table 1 anticipates excavation to a depth of 4 feet below top elevation of the tar deposit. In the creek bed environment diverting the water is a good first step to develop a dry work site. However the excavation will fill with seepage water from the stream bed. Pumping will be necessary as well as treatment of the discharge for turbidity. The work plan might include the installation of bypass piping for the diversion technique. Piping will get the water off the stream bed and away from the excavation site.

e. The description of the diversion techniques does not go far enough. Additional choices should be added to the description and these should be supported with graphics to illustrate the dimensional and other characteristics of the typical setup.

f. At a minimum one person on the work crew should have the Florida Erosion and Sedimentation Control Certification and be empowered to implement the measures necessary for compliance.

5. 3.2.4 Restoration – It seems appropriate to let the stream refill the excavation. It won't take long and it reduces the activity in the stream bed.
6. 3.3.1 Documentation - The log should include the work site turbidity logs and any measures implemented to attain the allowed differential reading.