



Department of Environmental Protection

Lawton Chiles
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Virginia B. Wetherell
Secretary

January 5, 1995

Mr. Joe McCauley, Code 18A
SOUTHNAVFACENGCOM
2155 Eagle Dr., P.O. Box 190010
North Charleston, SC 29419-9010

RE: Design Responsibility at Navy Installation Restoration
Sites in Florida

Dear Mr. McCauley:

The Navy is implementing hazardous waste and petroleum cleanup activities at its facilities in Florida. Implementation of these activities involve professional engineering practices defined by F.S. 471 and codified in Chapter 61G15, F.A.C. The Florida Department of Business and Professional Regulation, Board of Professional Engineers, is responsible for enforcement of these rules and insuring accountability in professional engineering practices to protect the welfare of the citizens of Florida. This letter summarizes our Department's understanding of the Navy's current professional engineering practices for installation restoration in Florida, our interpretation of these practices, and a proposal to help the Navy achieve its institutional goals within the requirements of F.S. 471.

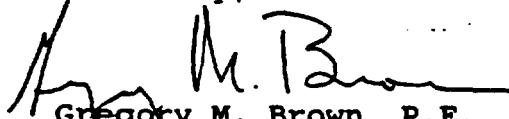
The Navy is using conceptual design documents coupled with remediation work plans to control cleanup activities at contaminated hazardous waste and petroleum sites. The Navy wishes to follow this strategy to reduce the time between investigation and actual remediation and to reduce associated costs. The conceptual design documents are prepared by the Navy CLEAN contractors and contain engineering decisions that include remedial objectives, cleanup criteria, alternatives analyses, feasibility assessments, process choices, and other performance criteria. The Navy's Remedial Action Contractor uses the conceptual design documents to prepare remediation work plans which contain site-specific engineering decisions that include equipment selection, material choices, component sizes, detailed site layout and configuration, process controls and logic, and other details of the physical construction of the project. Both sets of documents complement each other, and both are required to fully describe a constructed project. Both sets of documents are clearly engineering documents as defined in Chapter 61G15, F.A.C.

used for construction of the remedial action. Construction shop drawings are not required by the Department for review and approval during construction unless a modification to the RAP is necessary. Signed and sealed record drawings are submitted to the Department after construction to document compliance with the approved RAP.

The Department proposes that the same basic approach be applied at environmental restoration sites. A RAP-analogue, "remediation engineering design document", would be prepared that provides sufficient levels of detail to document both the conceptual and site-specific engineering decisions needed to fully describe the constructed remedial action. The remediation engineering design document would be signed and sealed by the responsible professional engineer of record and would be used for construction. Construction shop drawings would not be submitted to the Department for formal review and approval unless modifications to the remediation engineering design document are required. If construction shop drawings are submitted to the Department, they will be signed and sealed as engineering documents. At completion of construction, the engineer of record, or a qualified successor engineer, would submit record drawings and reports documenting compliance with the approved remediation engineering design document.

This approach will maintain accountability of professional engineering practices in accordance with F.S. 471 and be protective of the public welfare. A minor disadvantage of this approach is the earlier need in a project for a higher degree of engineering documentation than is contained in the current "conceptual design" documents. An important advantage of this approach, however, is that Department review of construction shop drawings are not required as long as the remediation engineering design documents are adequate and the final constructed projects comply with them. This should streamline construction. If you have any questions, please call me at (904) 488-3935.

Sincerely,



Gregory M. Brown, P.E.
Professional Engineer II
Technical Review Section

GMB/gb

cc: Tom Conrardy, P.E., FDEP, Tallahassee, FL
Larry Trautner, P.E., BEI, Oak Ridge, TN
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Robert Moser, P.E., EnSafe, Memphis, TN

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