

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
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August 24, 2018

Mr. Frank Chiappone
Manager, Global Environmental Affairs
Bausch & Lomb
1400 North Goodman Street
Rochester, New York 14609

Dear Mr. Chiappone:

**Subject: Former Bausch & Lomb Frame Center, Site #828061
Sampling For Emerging Contaminants; August 6, 2018
Town of Chili, Monroe County**

The New York State Departments of Environmental Conservation and Health (collectively “the Departments”), have completed their review of the document entitled *Sampling For Emerging Contaminants* (the Work Plan) dated August 6, 2018 for the Former Bausch & Lomb Frame Center site located in the Town of Chili. In accordance with 6 NYCRR Part 375-1.6, the Departments have determined that the Work Plan, with modifications, substantially address the requirements of the Order on Consent. The modifications are outlined as follows:

1. The emerging contaminant data will be submitted as an electronic data deliverable in a format acceptable to the Department within 90 days of receiving data from the laboratory. In addition, the laboratory data summary pages will be forwarded to the Departments upon receipt.

With the understanding that the above noted modifications are agreed to, the Work Plan is hereby approved. If you choose not to accept these modifications, you are required to notify this office within 20 days after receipt of this letter and prior to the start of field activities. In this event, I suggest a meeting be scheduled to discuss your concerns prior to the end of this 20-day period.

Thank you for your cooperation and please contact me at (585) 226-5357 if you have any questions.

Sincerely,



Frank Sowers, P.E.
Professional Engineer 1

ec:

B. Schilling

J. Kenney

J. Frazer

W. Silkworth

S. Powlin

Frank Sowers, P.E.
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Subject:
Sampling for Emerging Contaminants
Former Bausch & Lomb Frame Center - Chili, New York
Site ID 828061

ENVIRONMENT

Dear Mr. Sowers:

Date:
August 6, 2018

This letter has been prepared on behalf of Mr. Frank Chiappone of Bausch & Lomb in response to your June 15, 2018 letter requesting that Bausch & Lomb collect groundwater samples at the former Frame Center site for analysis of 1,4-dioxane and per-/polyfluoroalkyl substances (PFAS). We understand that the New York State Department of Environmental Conservation (DEC) is making this request to support a statewide evaluation of these compounds (referred to as emerging contaminants) at remediation sites. This letter presents Bausch & Lomb's proposed plan for the additional sampling at the former Frame Center site.

Contact:
Scott Powlin

Phone:
315 671 9456

Email:
Scott.Powlin@arcadis.com

Bausch & Lomb is proposing to collect groundwater samples from seven existing on-site monitoring wells to accommodate the DEC's request. These wells include BL-1, BL-9D, BL-9S, BL-16S, BL-17D, BL-25S, and BL-25D. Please refer to the attached Figure 1 from the 2017 Periodic Review Report for the location of these wells. BL-1 and BL-17D will serve as background sampling locations and BL-16S and the BL-9 and BL-25 clusters will serve to monitor for potential emerging contaminants associated with the site. Bausch & Lomb proposes that the sampling be conducted concurrent with ongoing sampling activities at the site. The next routine groundwater sampling event is scheduled for October 2018. The results of the 1,4-dioxane and PFAS sampling will be discussed in Bausch & Lomb's 2018 Periodic Review Report for the site. That report will be submitted to the DEC by March 1, 2019.

Our ref:
B0034222.2018.00001

Sampling methods will be the same as those approved for routine sampling at the site (included as Appendix 1 to the 2017 Periodic Review Report); however, samples will be collected following the precautions discussed in the attached field sampling guide. Alpha Analytical, Inc. will be performing the analyses using the following analytical methods:

Frank Sowers, P.E.
NYSDEC – Region 8
August 6, 2018

- United States Environmental Protection Agency (USEPA) Method 8270 simulated ion monitoring (SIM) will be used for 1,4-dioxane analyses. Alpha Analytical, Inc. anticipates that the detection limit for 1,4-dioxane will be equal to or less than 0.15 micrograms per liter ($\mu\text{g/L}$); and
- USEPA modified Method 537 will be used for PFAS analyses of all the chemicals listed on the DEC Division of Environmental Remediation PFAS target analyte list. Alpha Analytical, Inc. anticipates that detection limits for each compound on this analyte list will be equal to or less than 2 nanograms per liter (ng/L).

Sample results for 1,4-dioxane and PFAS analyses will include a NYSDEC Analytical Service Protocol (ASP) Category B data deliverable package. A Data Usability Summary Report (DUSR) will be prepared for only the 1,4-dioxane and PFAS data. The DUSR will be provided in the 2018 Periodic Review Report.

We look forward to your review and approval of this plan for sampling groundwater for emergent contaminants at the former Frame Center site. Please feel free to call me at 315-671-9456 or Frank Chiappone at 585-338-5087 if you have any questions.

Sincerely,

Arcadis of New York, Inc.



Scott A. Powlin
Senior Geologist

Copies:

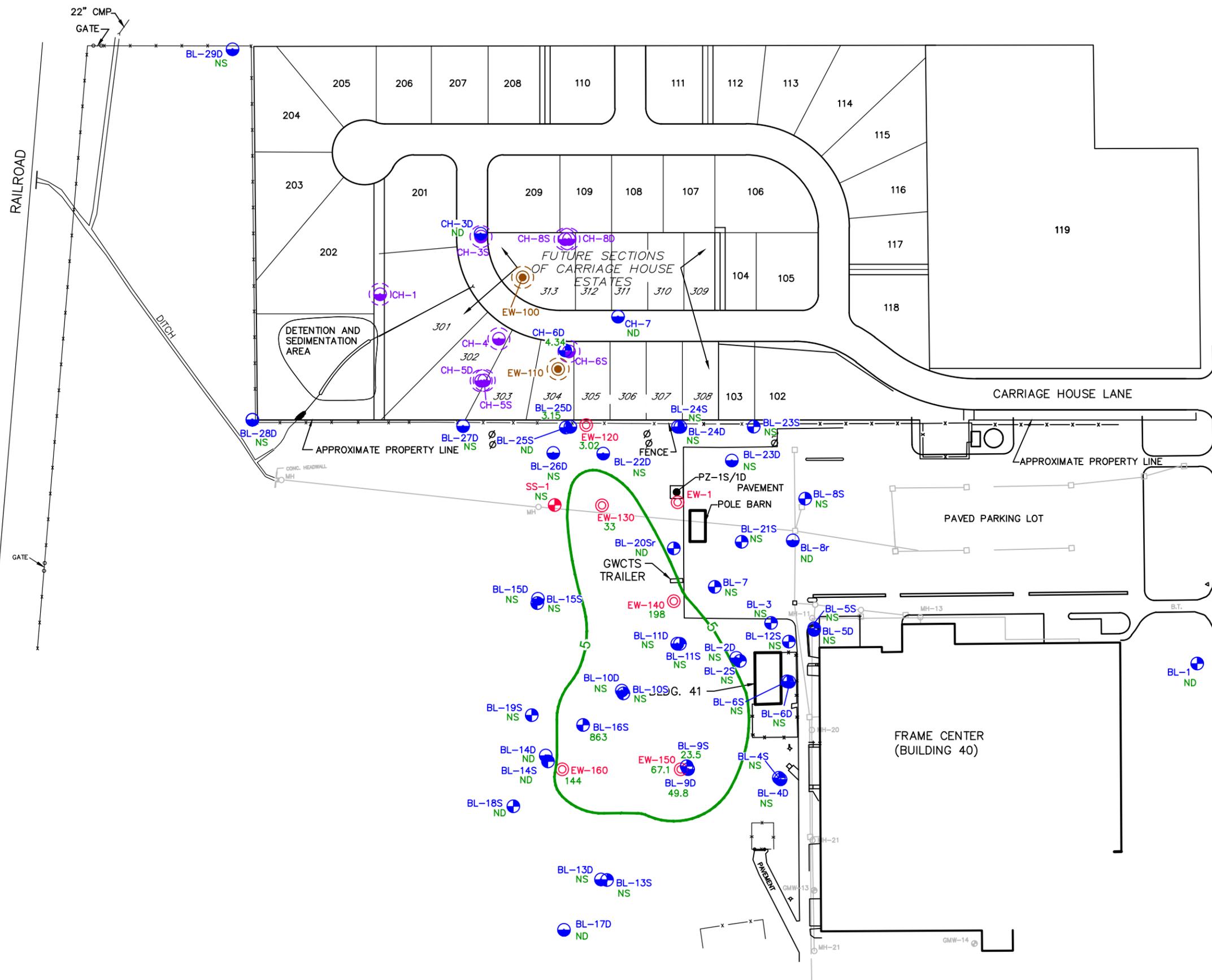
Frank Chiappone, Bausch & Lomb
Chris Kassel, Arcadis

Enclosures:

Figure 1 – 5 ppb TCE Distribution, October 2017
Attachment 1 – TGI – Poly – and Perfluorinated Alkyl Substances (PFAS) Field Sampling Guidance

CITY: (MINNEAPOLIS, MN) SYRACUSE, NY DIV/GROUP: ENV/CAD DB/(R, OBERLANDER) K, SARTORI PIC/OPR: PM: TM, L MIKOCHEK L/R: (OPTIONAL) OFF=REF: C:\Users\steinberger\OneDrive - ARCADIS\BIM_360 Docs\BAUSCH & LOMB INCORPORATED\Former Frame Center - Chili NY\2018\B0034222\2017\01-DWG\PRR-fig1-TCE 2017-10.DWG LAYOUT: 1 - SAVED: 1/17/2018 4:31 PM ACAD/VER: 20.1.5 (LMS TECH) PAGESETUP: PLOTSTYLETABLE: PLOTTED: 1/17/2018 4:31 PM BY: STEINBERGER, GEORGE

IMAGES: XREFS: PRR-X-Bee-1 PRR-XLB



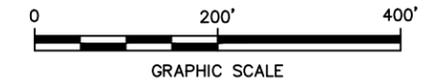
LEGEND:

- MONITORING WELL INSTALLED IN SHALLOW OVERBURDEN
- MONITORING WELL INSTALLED AT BASE OF OVERBURDEN/TOP OF ROCK
- ABANDONED MONITORING WELL
- STAINLESS STEEL WELL POINT
- CATCH BASIN
- MANHOLE
- 6"Ø EXTRACTION WELL
- ABANDONED EXTRACTION WELL
- 1"Ø NESTED PIEZOMETER
- APPROXIMATE ADJACENT TRACT BOUNDARY
- APPROXIMATE PROPOSED LOT BOUNDARY
- APPROXIMATE EXISTING LOT BOUNDARY
- APPROXIMATE EASEMENT BOUNDARY
- FENCE
- RG&E POWER POLE
- INFERRED TCE ISOCONCENTRATION CONTOUR (IN PARTS PER BILLION [ppb]), BASED ON FIGURE 4 OF THE BBL OCTOBER 2000 GROUNDWATER REMEDIAL DESIGN/REMOVAL ACTION WORK PLAN MODIFIED WITH THE RESULTS OF THE OCTOBER 2014 QUARTERLY SAMPLING RESULTS.
- TCE CONCENTRATION IN ppb AS MEASURED IN THE RESPECTIVE GROUNDWATER MONITORING WELL
- NOT DETECTED AT OR ABOVE THE DETECTION LIMIT AS SHOWN IN TABLE 1.
- NOT SAMPLED

PAUL ROAD (N.Y.S. ROUTE 252A)

NOTES:

1. SITE PLAN FOR THE ON-SITE AREAS COMPILED FROM EXISTING SITE PLANS PROVIDED BY BAUSCH & LOMB AND SITE SURVEYS TO LOCATE ALL MONITORING WELLS BY BB&L DATED 6/17/92, REVISED 4/13/94, 8/13/98, 10/28-29/98, AND 10/11/00.
2. LOCATIONS OF PROPERTY LINES, SUBSURFACE UTILITIES AND LIMITS OF BUILDINGS AND PARKING AREAS ARE APPROXIMATE.
3. ADJACENT PROPERTY INFORMATION FROM TRACT MAPS PREPARED BY LADIEU ASSOCIATES P.C.; LOT NUMBERS 101 TO 118 AND 201 TO 208 WERE DESIGNATED BY LADIEU ASSOCIATES P.C.; LOTS IDENTIFIED AS 301 TO 313 ARE IDENTIFIED HERE FOR CONVENIENCE ONLY. INVERT ELEVATION DATUM IS UNKNOWN.
4. OFF-SITE MONITORING WELLS AND EXTRACTION WELLS WERE ABANDONED IN FEBRUARY 2013 IN ACCORDANCE WITH ARCADIS' NOVEMBER 30, 2012 OFF-SITE WELL ABANDONMENT WORK PLAN. THE WORK PLAN WAS APPROVED BY NYSDEC IN A DECEMBER 14, 2012 LETTER.



BAUSCH & LOMB INCORPORATED
FORMER FRAME CENTER
CHILI, NEW YORK
PERIODIC REVIEW REPORT

**5 ppb TCE DISTRIBUTION
OCTOBER 2017**

ARCADIS Design & Consultancy
for natural and built assets

FIGURE
1

TGI - POLY- AND PERFLUORINATED ALKYL SUBSTANCES (PFAS) FIELD SAMPLING GUIDANCE

Rev #: 0

Rev Date: April 27, 2017



1 INTRODUCTION

This document describes general and/or specific procedures, methods, actions, steps, and considerations to be used and observed by Arcadis staff when performing work, tasks, or actions under the scope and relevancy of this document. This document may describe expectations, requirements, guidance, recommendations, and/or instructions pertinent to the service, work task, or activity it covers.

It is the responsibility of the Arcadis Certified Project Manager (CPM) to provide this document to the persons conducting services that fall under the scope and purpose of this procedure, instruction, and/or guidance. The Arcadis CPM will also ensure that the persons conducting the work falling under this document are appropriately trained and familiar with its content. The persons conducting the work under this document are required to meet the minimum competency requirements outlined herein, and inquire to the CPM regarding any questions, misunderstanding, or discrepancy related to the work under this document.

This document is not considered to be all inclusive nor does it apply to any and all projects. It is the CPM's responsibility to determine the proper scope and personnel required for each project. There may be project- and/or client- and/or state-specific requirements that may be more or less stringent than what is described herein. The CPM is responsible for informing Arcadis and/or Subcontractor personnel of omissions and/or deviations from this document that may be required for the project. In turn, project staff are required to inform the CPM if or when there is a deviation or omission from work performed as compared to what is described herein.

In following this document to execute the scope of work for a project, it may be necessary for staff to make professional judgment decisions to meet the project's scope of work based upon site conditions, staffing expertise, state-specific requirements, health and safety concerns, etc. Staff are required to consult with the CPM when or if a deviation or omission from this document is required that has not already been previously approved by the CPM. Upon approval by the CPM, the staff can perform the deviation or omission as confirmed by the CPM.

2 SCOPE AND APPLICATION

The purpose of this Technical Guidance Instructions (TGI) is to provide guidance on field sampling to be used for poly-and perfluorinated alkyl substances (PFAS). This protocol was adapted from various sources including Arcadis Australia, Transport Canada, and the U.S Army Corp of Engineers (USACE) Omaha.

Given the extremely low detection limits associated with PFAS analysis and the many potential sources of trace levels of PFAS, field personnel are advised to err on the side of caution by strictly following these protocols, frequently replacing nitrile gloves, and rinsing field equipment to help mitigate the potential for false detections of PFAS. Other specific items related to field sampling for PFAS are discussed in the sections below.

This TGI applies to all Arcadis and subcontractor personnel involved in field sampling for PFAS.

3 PERSONNEL QUALIFICATIONS

3.1 Sampling Personnel

Field personnel must have current health and safety training, including 40-hour HAZWOPER training, site supervisor training, and site-specific training, as needed. In addition, field personnel will be versed in the other relevant SOPs (e.g., low flow sampling) and will possess the skills and experience necessary to successfully complete the desired field work. The site Health and Safety Plan (HASP) and other documents will identify any other training requirements such as site-specific safety training or access control requirements.

3.2 Laboratories

These laboratories may be used to analyze environmental media for PFAS:

- United States: Test America, SGS, Vista, ALS, RTI, and Eurofins
- Canada: Axys-SGS and Maxxam Laboratories

Other laboratories may be used if they are accredited for PFAS analysis.

4 EQUIPMENT LIST

The following equipment and materials must be available for sampling:

- Site plan of sampling locations, relevant work plan (or equivalent), and this TGI;
- Appropriate health and safety equipment, as specified in the site HASP;
- Dedicated plastic sheeting (preferably high-density polyethylene [HDPE]) or other clean surface to prevent sample contact with the ground;
- Conductivity/temperature/pH meter;
- Dissolved oxygen meter, oxidation reduction potential meter, and turbidity meter;
- Depth to water meter;
- If using low-flow groundwater sampling techniques, peristaltic pump (groundwater sampling)/bladder pump (with PFAS free bladder/ HDPE bladder), flow through cell, and accompanying HDPE and silicone tubing;
- Hydrasleeves, if using Hydrasleeves for groundwater sampling;
- Metal trowel for soil samples; specialized soil/sediment sampling equipment as required;
- Brushes for scrubbing sampling equipment;
- Pens, pencils, and/or Sharpies for writing;
- Clipboards, field binders, and field note pages that are not waterproof;

- Labeled sample bottles:
 - Water: HDPE bottles fitted with polypropylene screw cap only; some types of PFAS samples (primarily drinking water) may require preservative, which will be indicated by the laboratory conducting the analysis. The laboratory will specify the sample bottle volume.
 - Soil and sediment: HDPE bottles fitted with polypropylene screw cap only; no preservatives. The laboratory will specify the sample bottle volume.
- If high concentrations of PFAS related to class B firefighting foams are expected, bring 'shaker test' vials;
- Ziploc® bags to hold ice and samples;
- Appropriate blanks (field reagent blanks supplied by the laboratory);
- Appropriate transport bottles (coolers) with ice and appropriate labeling, no blue ice;
- Deionized water for initial decontamination rinsing;
- "PFAS-free" water provided by the laboratory for final decontamination rinsing;
- Methanol, if readily available; especially important for soil sampling;
- Alconox or Liquinox®;
- Packing and shipping materials;
- Groundwater Sampling Log; and
- Chain-of-Custody (COC) Forms.

5 CAUTIONS

5.1 Food Packaging

Some food packaging may be treated with PFAS-containing chemicals to prevent permeation of oil and water in the food outside of the packaging. To avoid potential food packaging-related PFAS contact:

- Do not bring any food outside of the field vehicles onsite and eat snacks and meals offsite.
- Wash hands after eating.
- Remove any field garments or outer layers prior to eating. Do not put them back on until done eating and hands are washed.

5.2 Field Gear

5.2.1 Clothing

Many types of clothing are treated with PFAS for stain and water resistance, in particular outdoor performance wear under brand names such as Gore-Tex®. To avoid potential clothing-related PFAS contact:

- Do not wear any outdoor performance wear that is water or stain resistant, or appears to be. Err on the side of caution.
- Wear pre-laundered (multiple washings, i.e. 6+) clothing that is not stain resistant or water proof.
- Natural fabrics such as cotton are preferred. Synthetic fabrics may also be acceptable if there is no indication on the label that the fabric is water and stain resistant.
- Most importantly, avoid contacting your clothing with sampling equipment, bottles, and samples.

5.2.2 Personal Protective Equipment

Safety Footwear

Some safety footwear has been treated to provide a degree of waterproofing and increased durability, and may represent a source of trace PFAS. For the health and safety of field personnel, footwear must be protected at all times to avoid potential PFAS contamination. To do this:

- Do not touch your safety footwear in the immediate vicinity of the sampling port (i.e., within 10 meters [m]).
- Do not allow gloves used for sampling to come in contact with safety footwear.

Nitrile Gloves

- Wear disposable nitrile gloves at all times. Don a new pair of nitrile gloves **before** the following activities at each sample location:
- Decontamination of re-usable sampling equipment;
- Contact with sample bottles or “PFAS-free” water bottles;
- Insertion of anything into the sample ports (e.g., HDPE tubing); and
- Handling of any quality assurance/quality control (QA/QC) samples including field blanks and equipment blanks.

Don a new pair of nitrile gloves after the following activities:

- Handling of any non-dedicated sampling equipment;
- Contact with contaminated surfaces; or

- When judged necessary by field personnel.

5.3 Personal Hygiene

- Shower at night.
- Do not use personal care products after showering such as lotions, makeup, and perfumes, UNLESS medically necessary.
- Use sunscreen and insect repellent ONLY if necessary for health and safety. If they are necessary, apply sunscreen and repellent prior to initiating field sampling. If sunscreen and/or repellent need to be reapplied, ensure a safe distance away from the sampling locations and equipment (i.e., more than 10 m away). Wash hands after application.

5.4 Visitors

Visitors to the site are asked to remain at least 10 m from sampling areas.

5.5 Rain Events

Special care should be taken when rain is falling at the project site:

- Do not perform field sampling when rain fall is persistent at a consistent rate that saturates the ground (i.e., formation of puddles) because rain gear is not permitted while sampling. Intermittent showers or fog are acceptable conditions to proceed. If rain showers occur; field gear must be removed from the monitoring well location until the rain subsides.
- If project timelines are tight, consider the use of a gazebo tent that can be erected over the top of the monitoring well to provide shelter from the rain. The canopy material is possibly a PFAS-treated surface and should be managed as such; therefore, wear gloves when moving the tent, change them immediately after moving the tent, and avoid further contact with the tent until all sampling activities have been finished and the team is ready to move on to the next site.

6 HEALTH AND SAFETY CONSIDERATIONS

- The ability to safely access the surface water sampling locations must be verified before sampling.
- Field activities must be performed in accordance with the site HASP, a copy of which will be present onsite during such activities.
- Safety hazards associated with sampling surface water include fast-moving water, deep water, and steep slopes close to sampling sites. Use extreme caution when approaching sampling sites.
- If thunder or lightning is present, discontinue sampling and take cover until 30 minutes have passed after the last occurrence of thunder or lightning.
- Use caution when removing well caps as well may be under pressure, cap can dislodge forcefully and cause injury.

7 PROCEDURE

7.1 Field Equipment Cleaning

Field sampling equipment will require cleaning between uses. For groundwater sampling, between uses, decontaminate the flow-through cell and any non-dedicated equipment (i.e., interface probe of depth to water meter) that comes into contact with well water. Trowels and other materials used to sample soil samples will also require decontamination.

After donning a new pair of nitrile gloves:

- Rinse sampling equipment with Alconox or Liquinox® cleaning solution; Scrub equipment with a plastic brush if needed;
- Rinse two times with distilled water or deionized water;
- Rinse one time with “PFAS-free” water or once with methanol, if it is available, and once with “PFAS-free” water; methanol is especially useful for decontaminating soil sampling equipment; and
- Collect all rinsate in a sealed pail for disposal. Do not reuse decontamination solutions between sampling locations.

Clean all field equipment used at locations that are suspected of containing class B firefighting foam (i.e., those that foam during shaking or are known to be near a class B firefighting foam source zone) using each of the above steps repeated twice.

7.2 Borehole/Monitoring Well Development

If a drill rig is being used to drill for soil cores or to install monitoring wells, wear clean nitrile gloves before collecting each continuous soil sample. Additional requirements include the following:

- Verify in writing with the manufacturer that single-use liners used to collect each sample are made of a material that does not contain PFAS;
- Collect soil samples in laboratory-supplied HDPE bottles.
- Store the sample bottles in coolers and keep at a temperature of 0 to 6°C until transported to the laboratory.

7.2.1 Well Condition Survey/ Water Level Monitoring

Using equipment that has been thoroughly decontaminated according to the procedures in Section 7.1, conduct the well condition surveys and water level monitoring:

- Conduct monitoring well inspections and record water levels.
- Use an interface probe to evaluate presence/absence of non-aqueous phase liquid (NAPL).
- Measure the depth to water from the top of the polyvinyl chloride (PVC) riser and the total depth of the well.

- Record information in the field notes.

7.2.2 Monitoring Well Development and Purging

Follow these requirements for monitoring well development and purging:

- Do not use Teflon™ tubing for purging or sample collection. HDPE tubing is acceptable.
- Do not re-use materials between wells. Upon completion of use, remove all disposable materials (such as HDPE and/or silicone tubing) and place in heavy duty garbage bags for disposal.
- During development of the well, create sufficient energy to agitate the water column and create flow reversals in the well screen, filter pack and formation to loosen fine-grained materials and draw them into the well. The pumping or bailing action should then draw all drilling fluids and fine-grained material out of the borehole and adjacent formation and then out of the well. Review the Arcadis Monitoring Well Development guidance (Arcadis 2010) for more detailed information.
- Follow the low-flow purge and sampling techniques per the U.S. Protection Agency's (EPA's) guidance document titled *Low Stress (Low Flow) purging and Sampling Procedure for the Collection of Ground Water Samples from Monitoring Wells (2010)* and ASTM's standard titled *Standard Practice for Low-Flow Purging and Sampling for Wells and Devices Used for Ground-Water Quality Investigations (2002)*. Also, available for review is the Arcadis Low-Flow Groundwater Purging and Sampling Procedures for Monitoring Wells (Arcadis 2011).
- To purge the well, if using HDPE tubing and a peristaltic pump, insert the end of the tubing to the approximate depth of the midpoint of the screened section of the monitoring wells. Measure the length of HDPE tubing to be inserted into each monitoring well and pre-cut it to approximate lengths (such as the previously measured arm span of a field technician) to avoid contact with any materials other than the monitoring well and peristaltic pump. Flow rates should be as low as can be reasonably achieved. Collect and appropriately dispose of purge water.
- Silicone tubing should direct the purge water through a flow-through cell for field parameter measurements of pH, conductivity, temperature, dissolved oxygen, and turbidity. Calibrate the instrument in the field prior to use. Decontaminate the instrument and flow-through cell at each monitoring well location before purging.
- Record field parameters in intervals (generally of 3-minute duration) to ensure purge water has cycled through the flow-through cell. Sample the wells after field parameter measurements indicate stabilization, which allows collection of representative formation water (generally acceptable standards are three consecutive pH readings to within ± 0.1 units, and three consecutive conductivity, temperature and dissolved oxygen measurements to within 3%). Turbidity must be monitored, but does not need to be used as a stabilization indicator of purge completion. Record field parameter measurements at each well. Drawdown should be monitored throughout the purge.
- If wells are suspected to be dewatering throughout the purge (i.e., reduced flow rate/difficulty pumping water or bubbles begin to come through the flow through cell), turn off the pump and allow the water level to recover for ½ hour, followed by sample collection. Document these activities in the field notes.

7.3 Sample Collection

Different laboratories may supply sample collection bottles of varying sizes depending on the type of media to be sampled.

7.3.1 Sample Containers

- Collect samples in HDPE bottles fitted with an unlined (no Teflon™), polypropylene screw cap.
- Complete bottle labels after the caps have been placed back on each bottle.
- Do not use glass bottles due to potential loss of analyte through adsorption. This is particularly important for aqueous samples.

7.3.2 Soil Sampling

Before Sample Collection

- Place plastic sheeting (preferably HDPE) adjacent to the sample port for use as a clean work area, if conditions allow. Otherwise, prevent sampling equipment from contacting the ground or other surface that could compromise sample integrity.
- Trowels or drilling equipment that will come into contact with a sample should be decontaminated prior to sample collection, preferably with methanol;
- Don a new set of nitrile gloves. Do not use gloved hands to subsequently handle papers, pens, clothes, etc., before collecting samples.
- Use the HDPE bottles that are supplied by the laboratory. Make sure that the caps remain on the bottle until immediately prior to sample collection.

During Sample Collection

- Collect soil samples using a clean stainless steel trowel or with single-use PFAS-free liners;
- Place soil samples in labeled HDPE bottles supplied by the laboratory.
- Collect any necessary duplicates/co-located samples and matrix spikes – verify with laboratory whether they need to be collected in separate sample bottles.
- Note the time on the sample label.

After Sample Collection

- Place soil sample bottles in a sealed Ziploc® bag (optional).
- Record the label information and time of sampling in the field notes.
- Place soil sample bottles in coolers that are durable in transportation and keep the temperature between 0 and 6°C until transported to the laboratory. **Do not use blue ice.**

7.3.3 Groundwater Sampling

Before Sample Collection

- Place plastic sheeting (preferably HDPE) adjacent to the sample port for use as a clean work area, if conditions allow. Otherwise, prevent sampling equipment from contacting the ground or other surface that could compromise sample integrity.
- Don a new set of nitrile gloves. Do not use gloved hands to subsequently handle papers, pens, clothes, etc., before collecting samples.
- Use the labeled HDPE bottles that are supplied by the laboratory. Make sure that the caps remain on the bottle until immediately prior to sample collection.
- Measure depth to water and field parameters. Turbidity and the physical appearance of the purged water should be noted on the Groundwater Sampling Log.

During Sample Collection

- Start groundwater sample collection upon stabilization of field parameters.
- If low-flow groundwater sampling techniques are being used, disconnect the silicone tubing from the flow-through cell, enabling collection of groundwater samples prior to passing through the cell.
- Hydrasleeves are also considered acceptable for sampling of PFAS in groundwater – consult the project manager to determine which technique should be used. In general, low flow sampling is preferable.
- Collect groundwater samples (to the neck of the bottle, some headspace is acceptable) from the dedicated sampling ports at the center of the well screen. While collecting the sample, make sure the bottle cap remains in the other hand of the sampler, until replaced on the bottle.
- To mitigate cross contamination, collect groundwater samples in a pre-determined order from least impacted to greater impacted based on previous analytical data or knowledge about past activities at the site. If no analytical data are available, samples are to be collected in the following order:
 1. First sample the upgradient well(s).
 2. Next, sample the well located furthest downgradient of the interpreted or known source.
 3. The remaining wells should be progressively sampled in order from downgradient to upgradient, such that the wells closest to the interpreted or known source are sampled last.
- NOTE: If high concentrations of PFAS related to class B firefighting foams are expected in a groundwater sample, collect and shake a small portion of the sample (~10 to 25 mL) on site. If foaming is noted within the sample, document the foaming when samples are submitted for analysis; the 'shaker test' vial can then be disposed. This shaker test provides information about how each of the samples should be handled analytically.
- After collecting the sample, tightly screw on the polypropylene cap (snug, but not too tight). This will minimize leaking or cross contamination of the sample. Most PFAS, including all analytes measured by USEPA Method 537, are not volatile at environmental pH.

- Note the time on the sample label.
- Collect any necessary duplicates and matrix spikes. As the laboratory should be analyzing the entire aqueous sample rather than sub-sampling, separate bottles will be required for these samples.
- Do not rinse PFAS sample bottles during sampling. Do not filter samples.

After Sample Collection

- Place groundwater sample bottles in a sealed Ziploc® bag (optional).
- Record the label information and time of sampling in the field notes and COC. Note 'shake test' results if appropriate.
- Place groundwater samples in coolers that are durable in transportation and keep the temperature between 0 and 6°C until transported to the laboratory. **Do not use blue ice. Store PFAS samples in a separate cooler from other types of samples.**
- Treat all disposable sampling materials as single use and dispose of them appropriately after sampling at each monitoring well.

7.3.4 Sediment Sampling

Before Sample Collection

- Place plastic sheeting (preferably HDPE) adjacent to the sample port for use as a clean work area, if conditions allow. Otherwise, prevent sampling equipment from contacting the ground or other surface that could compromise sample integrity.
- Don a new set of nitrile gloves. Do not use gloved hands to subsequently handle papers, pens, clothes, etc., before collecting samples.
- Use the HDPE bottles that are supplied by the laboratory. Make sure that the caps remain on the bottle until immediately prior to sample collection.

During Sample Collection

- Where surface water samples and sediment samples are collected at the same location, collect surface water samples first to minimize siltation.
- Collect sediment samples either manually using a stainless-steel trowel or using a petite ponar grab sampler, depending on field conditions at each sampling location during sampling program.
- Collect sediment samples from the upper 10 cm of sediment.
- For a sample to be acceptable overlying, low turbidity water must be present.
- Decant the overlying water and use a stainless-steel trowel to collect only the upper 5 centimeters (cm) of sediment.

- Collect sediment samples directly into laboratory-supplied bottles that are suitable in both material and size.
- Do not overfill the sample bottle.
- Make sure that the sample does not contain vegetation, that the sediment is undisturbed, and that the sampler shows no signs of winnowing or leaking.
- Make sure bottle caps remain in the gloved hand of the sampler until sampling is complete and caps are replaced on the bottle.
- Collect any necessary duplicates and matrix spikes.

After Sample Collection

- Place sample bottles in a sealed Ziploc® bag (optional).
- Record the label information and time of sampling in the field notes.
- Place samples in coolers that are durable in transportation and keep the temperature between 0 and 6°C until transported to the laboratory. **Do not use blue ice. Store PFAS samples in a separate cooler from other types of samples.**
- Measure surface water pH, conductivity, temperature, and total dissolved solids (TDS) at each location **after** both surface water and sediment sampling is completed.

7.3.5 Surface Water Sampling

Before Sample Collection

- Place plastic sheeting (preferably HDPE) adjacent to the sample port for use as a clean work area, if conditions allow. Otherwise, prevent sampling equipment from contacting the ground or other surface that could compromise sample integrity.
- Don a new set of nitrile gloves. Do not use gloved hands to subsequently handle papers, pens, clothes, etc., before collecting samples.
- Use the HDPE bottles that are supplied by the laboratory. Make sure that the caps remain on the bottle until immediately prior to sample collection.

During Sample Collection

- Avoid sampling the surface.
- Where surface water samples and sediment samples are collected at the same location, collect surface water samples first to minimize siltation.
- Collect surface water samples directly into laboratory-supplied bottles; wide-mouth bottles may be preferable to narrow mouth bottles for ease of surface water collection.

- Collect any necessary duplicates and matrix spikes. As the laboratory should be analyzing the entire aqueous sample rather than sub-sampling, separate bottles will be required for these samples.
- Make sure bottle caps remain in the gloved hand of the sampler until sampling is complete and caps are replaced on the bottle.

After Sample Collection

- Place sample bottles in a sealed Ziploc® bag (optional).
- Record the label information and time of sampling in the field notes.
- Place samples in coolers that are durable in transportation and keep the temperature between 0 and 6°C until transported to the laboratory. **Do not use blue ice. Store PFAS samples in a separate cooler from other types of samples.**
- Measure surface water pH, conductivity, temperature, and TDS at each location **after** both surface water and sediment sampling.

7.4 Shipping

- If samples cannot be shipped the same day as collected, arrange an appropriate means of keeping the samples cool overnight and maintain the temperature between 0 and 10°C for the first 48 hours after collection, and then between 0 and 6°C thereafter.
- Store samples in appropriate transport bottles (coolers) with ice (Ziploc® bags for use as ice containers) with appropriate labeling. **Do not use blue ice. Store PFAS samples in a separate cooler from other types of samples.**
- Complete the appropriate procedures for COC, handling, packing, and shipping.
- Fill out and check COC Forms against the labels on the sample bottles progressively after each sample is collected.
- Place all disposable sampling materials (such as plastic sheeting, and health and safety equipment) in appropriate containers.
- Ship samples via courier service with priority overnight delivery. Tracking numbers for all shipments should be provided and recorded after they have been sent out to ensure their timely delivery.
- Do not ship samples via Fed Ex for Saturday delivery.

8 WASTE MANAGEMENT

All rinsate should be collected in a sealed pail for disposal. Drill cuttings and purge water will be managed as specified in the Field Sampling Plan (FSP) or Work Plan, and according to state and/or federal requirements. PPE and decontaminated fluids will be contained separately and staged at the sampling location. Containers must be labeled at the time of collection. Labels will include date, location(s), site name, city, state, and description of matrix contained (e.g., soil, groundwater, PPE). General guidelines

for investigation derived waste (IDW) handling and storage are set forth in a separate IDW guidance document (Arcadis 2009).

Typical waste characterization procedures include collection of a composite sample of the drill cutting material and a composite sample of the purge water for laboratory analysis. Samples are typically analyzed for disposal toxicity characteristic leaching procedure (TCLP) analysis for metals and VOCs. For PFAS, a simple leach test with neutral pH water may be more indicative of actual risk. Additionally, generators of waste are required to include analysis of other constituents that are reasonably believed to be present including (in this case) PFAS.

Emerging contaminants pose a unique challenge for disposal because acceptance of such waste will be based on the local facility and their permit restrictions. Project teams will be required to identify appropriate facilities based on the facility's legal ability to accept the waste and the team should confirm that the facility is meeting the regulatory requirements for accepting waste containing PFAS. In general, facilities that provide solidification and/or incineration will be likely to meet the necessary requirements to accept PFAS-containing waste. The facility will then provide the definitive laboratory analysis requirements needed to meet their permit requirements for waste classification.

9 DATA RECORDING AND MANAGEMENT

9.1 Field Notes

Waterproof field books must not be used for field notes. Instead, field notes should be on loose paper on Masonite, plastic, or aluminum clip boards. Other requirements for field notes include:

- Pens, pencils, and Sharpies may be used.
- Keep field notes and writing implements away from samples and sampling materials.
- One person should conduct sampling while another records field notes.
- Do not write on sampling bottles unless they are closed.

9.2 Other Project Documentation

- Complete Groundwater Sampling Logs.
- Make sure COC Forms are properly completed. Verify which PFAS analytes (e.g., just PFOS and PFOA, some or all of the 537 list, etc.) are required for analysis and note on the COC.

10 QUALITY ASSURANCE

Refer to quality control requirements for the project to ensure that appropriate quality assurance and quality control (QA/QC) samples are collected. When collecting QA/QC samples, the same guidelines apply as when collecting regular samples – specifically that:

- Samples should be collected in laboratory-supplied HDPE bottles;

- Bottle caps must remain in the hand of the sampler until replaced on the bottle;
- Labels must be completed after the caps have been placed back on each bottle; and
- Samples must be stored in appropriate transport bottles (coolers) with ice (Ziploc® bags for use as ice containers) with appropriate labeling. **Do not use blue ice. Store PFAS samples in a separate cooler from other types of samples.**

10.1 Equipment Blanks (if relevant)

QA/QC sampling typically includes daily collection of equipment blanks using the laboratory-supplied “PFAS-free” water. For peristaltic pump tubing, laboratory supplied “PFAS-free” water should be poured into a clean HDPE sample bottle and then pumped through new HDPE tubing using the peristaltic pump (with new silicone tubing).

10.2 Field Duplicates

QA/QC sampling typically includes the collection of one field duplicate for every 10 or 20 samples collected. Each duplicate sample will be collected immediately after the initial sample of which it is a duplicate into a separate laboratory-provided sample bottle. Do not indicate to the laboratory which sample the duplicate replicates, i.e. it should be given a blind reference on the COC and sample name such as “duplicate”.

10.3 Field Blanks

QA/QC sampling for PFAS typically includes the submission of one laboratory supplied reagent field blank per day. The reagent field blank sample is brought to the site in a laboratory-supplied sample bottle. Field staff transfer the laboratory-supplied reagent blank to an empty sample bottle. This reagent field blank should be placed in the same cooler as the other PFAS samples.

10.4 Matrix Spikes (optional in some cases)

QA/QC sampling includes submitting a sample to be used as a matrix spike if the project requires it. If a separate sample bottle is required, an additional sample will be collected immediately after the initial sample of which it is a duplicate into a separate laboratory-supplied sample bottle.

10.5 Laboratory Analytical QA/QC

- Internal laboratory QA/QC should consist of one laboratory blank and one laboratory control sample (or blank spike) per batch of samples, and additional QA/QCs as indicated by the laboratory QA/QC procedures. Isotope dilution should be used for quantification with isotope-labeled surrogate standards, as available.
- For groundwater and surface water samples, extract the entire groundwater and surface water sample and at least two sampling bottle solvent rinsates for analysis to increase sample accuracy. Avoid sub-sampling an aliquot of the sample bottle.

- Soil samples should be analyzed in their entirety or thoroughly homogenized before extraction and analysis.
- As part of the internal QA/QC, relative percent difference (RPD) should be calculated between samples and corresponding field or laboratory duplicates. The laboratory quality assurance portion of the laboratory certificates should be reviewed to verify that all calculations/recoveries were within acceptable limits as established by the laboratory method.
- In January 2017, the U.S. Department of Defense (DOD) and U.S. Department of Energy (DOE) Quality Systems Manual (QSM) 5.1 was finalized and introduced laboratory guidance for the measurement of PFAS in matrices other than drinking water. This guidance is not a detailed procedural method such as an EPA method, but it does recommend best practices around the analysis of PFAS. Laboratories are not required to comply with QSM 5.1 until 2019, although the recommendations around PFAS analysis are similar to what most laboratories are already implementing. Arcadis recommends that any request for PFAS analysis in groundwater or soil should specifically reference the need to comply with Table B-15 in the QSM 5.1.

11 REFERENCES

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