SITE CHARACTERIZATION WORK PLAN

Corning Area Wide Study

Corning, Steuben County, New York

Prepared for:

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ACRONYMS

AHA	Activity Hazard Analysis
AWS	Area Wide Study
bgs	below ground surface
CAMP	Community Air Monitoring Plan
DER	Division of Environmental Remediation
DI	deionized
EM	electromagnetic induction
FAP	Field Activities Plan
GPR	ground-penetrating radar
GPS	global positioning system
IDW	investigation-derived waste
MS/MSD	matrix spike/matrix spike duplicate
NAD 83	North American Datum of 1983
NAVD 88	North American Vertical Datum of 1988
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
PET	polyethylene terephthalate
PFAS	per- and polyfluoroalkyl substances
PFOA	perfluorooctanoic acid
PFOS	perfluorooctanesulfonic acid
PID	photoionization detector
PPE	personal protective equipment
PSHEP	Project Safety, Health, and Environmental Plan
QA/QC	quality assurance/quality control
QAPP	Quality Assurance Project Plan
RF	radio frequency
SCOs	Soil Cleanup Objectives
SSHEP	Subcontractor Safety, Health, and Environment Plan
SVOCs	semivolatile organic compounds
TCL	Target Compound List
TCLP	Toxicity Characteristic Leaching Procedure
VOCs	volatile organic compounds
USEPA	United States Environmental Protection Agency

SECTION 1 PROJECT OBJECTIVES AND BACKGROUND

1.1 Project Objectives

New York State Department of Environmental Conservation (NYSDEC), along with the New York State Department of Health (NYSDOH), have been overseeing the investigation and implementation of remedial activities associated with past disposal of waste materials from historical glass operations.

Parsons proposes to assist NYSDEC with the site characterization efforts in the greater Corning area, as part of this Area Wide Study (AWS) to:

- Investigate potential impacts from target fill material containing ash, glass, and/or brick (glass manufacturing-related waste).
- Investigate potential presence and location of contaminants in surface and subsurface soils.

The primary contaminants of concern (COCs), based on previous investigations and remedial activities at properties found to have ash, glass, and/or brick (ABG) material, have been identified as inorganics (namely, arsenic, cadmium, and lead) and SVOCs.

Tasks are further defined in subsequent sections, and include:

- Advancement of soil borings
- Collection of surface and subsurface soil samples
- Submittal of a final summary report

1.2 Project Background

In general, remedial activities have been focused to date on an area within the City of Corning known as the Study Area (**Figure 1**). As part of the remedial activities being conducted in the Study Area, soil is being removed and disposed of at a permitted facility. Primary COCs from ABG include inorganics (namely arsenic, cadmium, and lead) and SVOCs whose concentrations frequently exceed NYSDEC Restricted Residential Soil Clean-up Objectives (SCOs). Approximately 20 percent of the soils are characterized as hazardous wastes.

In addition to the Study Area, more than 60 other properties in the City of Corning, Town of Corning, South Corning Village, Riverside Village, and surrounding areas have been brought to NYSDEC's attention due to the confirmed or suspected presence of ABG material. This material is observed to have characteristics including, but not limited to, thermometer tubing, filter rods, glass lenses, uranium glass, glass cullet, ash, slag, and furnace brick. Recognizing that, over the past several years, the number of hazardous waste sites in the greater Corning area has increased dramatically, NYSDEC is taking a broader, area-wide approach to addressing contamination from historical glass operations. To guide this approach, NYSDEC is seeking information and documentation that would allow for the expeditious and efficient investigation, and if necessary, remediation of the greater Corning area.

Based on the number of properties, the widespread nature of the locations, and the fact that new reports of ABG are regularly received by the agencies, there is a concern that there is a widespread risk associated with exposure to multiple receptors. These risks include residents incidentally coming into contact with ABG present in soils

through home maintenance and recreational activities, and workers encountering ABG present in soils during infrastructure repairs and/or upgrades.

The proposed sampling for the AWS will include four types of properties:

- Sites with concentrated populations and exposure risk such as apartments, schools, and daycares;
- Residential, educational, and recreational properties near sites with confirmed ABG;
- Properties with suspected ABG that have not been investigated previously; and
- Properties identified as potentially suitable background locations.

Properties to be sampled will be selected based on reports of ABG and to provide representative coverage throughout the greater Corning area.

In addition, samples may be collected from excavations where utility work is being conducted by the City of Corning, other municipalities, and/or utility contractors and ABG is observed.

SECTION 2 HEALTH AND SAFETY

A *Project Safety, Health, and Environmental Plan* (PSHEP; Parsons 2021b) has been prepared for the investigation activities. All personnel and subcontractors working on the project are required to follow this plan for the work covered in this work plan. Copies of the PSHEP will be maintained at the support zone.

Prior to the start of work, the subcontractors and call out contractors shall submit a Subcontractor Safety, Health, and Environmental Plan (SSHEP) along with specific Activity Hazard Analyses (AHAs) for tasks to be performed under this work plan. Work cannot commence until SSHEP and AHAs are reviewed, and comments have been addressed. Copies of the SSHEP and AHAs will be maintained at the support zone.

The NYSDOH generic Community Air Monitoring Plan (CAMP) (NYSDEC, 2010) will be implemented for real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the upwind and downwind perimeter of each designated work area during invasive activities on-site (see **Attachment 1**). If sampling occurs within 20 feet of occupied structures or potentially exposed populations, a Special Requirements CAMP will be implemented with continuous monitoring of VOCs and particulates that reflects the nearest potentially exposed individuals and the location of ventilation system intakes for nearby structures. Consideration will be given to conducting sampling activities during times when potentially exposed populations are less likely to be present.

These readings will be provided on a weekly basis with all exceedances reported to NYSDEC and NYSDOH the same day (or next business day if after hours) along with the following:

- the reason for the exceedance
- what was done to correct the exceedance
- if the correction was effective

SECTION 3 QUALITY CONTROL

3.1 Field Activities

Field activities will be conducted in accordance with the following documents, prepared by Parsons for the NYSDEC program:

- PSHEP (2021b)
- Corning Area Wide Study Quality Assurance Project Plan (QAPP), provided in **Attachment 2**.
- Field Activities Plan (FAP; 2020)

Site-specific elements and specific AHAs for soil borings and surface soil sampling will be added to the PSHEP, as needed.

All proposed sample locations will be discussed with representatives of NYSDEC prior to implementation of this scope. Investigation/sample location may be modified with concurrence from NYSDEC.

3.2 Emerging Contaminants

Sampling will also be conducted for emerging contaminants as part of this investigation in general accordance with the applicable guidance documents, such as the NYSDEC *Guidelines for Sampling and Analysis of PFAS* (NYSDEC, 2022) and United States Environmental Protection Agency (USEPA) Draft Method 1633 Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS (USEPA 2021). One of these contaminants is per- and polyfluoroalkyl substances (PFAS) compounds. PFAS can be found in many standard environmental sampling materials, including fluoropolymer bailer/tubing, some decontamination solutions, and pump bladders/valves. Two of the principal target analytes – perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) – have been broadly utilized in the production of various everyday items such as: waterproof/stain-resistant clothing, non-stick cookware, and many commonly used plastics.

Another of the target analytes is 1,4-dioxane. This compound has been used in many products including the manufacturing of pharmaceuticals, personal care products, polyethylene terephthalate (PET) plastic, paint strippers, dyes, greases, varnishes, and waxes.

The field activities and methods in the FAP include steps to prevent cross-contamination, and to avoid the introduction of external contaminant sources. These steps include, but are not limited to:

- use of sampling materials, tools, and personal protective equipment (PPE) that are known to be free of emerging contaminants
- use of compatible apparel
- hygiene considerations
- sample management considerations
- quality assurance/quality control (QA/QC) procedures
- use of source water and decontamination solutions that are demonstrated to be free of emerging contaminants

SECTION 4 SURVEYS, INVESTIGATIONS, ENVIRONMENTAL SAMPLING, AND IMPLEMENTATION

Parsons' approach to the site characterization is described in the following sections. Each portion of the investigation work will follow NYSDEC guidelines outlined in Division of Environmental Remediation (DER)-10 Technical Guidance document (NYSDEC 2010).

The overall program consists of:

1. Geophysical investigation (utility mapping)
2. As-built investigation coordinates for soil borings
3. Soil boring advancement and collection of surface and subsurface soil samples

4.1 Field Preparation

4.1.1 Geophysical Investigation

Prior to initiation of site activities at a given property, Dig Safely New York will be contacted to locate utility lines that enter and/or cross the property. Depending on the results of the utility markout performed by Dig Safely New York, a geophysical survey may also be performed to detect buried structures and subsurface utilities within the vicinity of the proposed sampling locations, and/or to trace a particular utility line or system. The geophysical surveyor will apply the appropriate surface geophysical method(s) to search for utilities and/or buried obstructions. Geophysical technologies may include but not be limited to ground-penetrating radar (GPR), radio frequency (RF), and electromagnetic induction (EM). These techniques will be used to locate subsurface utility lines or subsurface features within a 10-foot radius of each proposed intrusive activity. Specific features may include subsurface utilities, subsurface anomalies, large voids, former subsurface structures, abandoned utilities, and former utility trenches. Based on an interpretation of data, the geophysical surveyor will mark the targets on the ground surface. Paint and flagging shall be used for marking of lines, showing any underground site utilities or obstructions. Prior to intrusive work, Parsons will follow the *Subsurface Soil Disturbance Protocol* (see **Attachment 3**).

4.2 Soil Investigation

Soil characterization activities will consist of collecting surface and subsurface soil samples from one or more areas at each identified property. Specific properties will be identified separately from this workplan.

4.2.1 Soil Borings and Soil Sampling

The soil borings and soil sampling tasks include:

- Collection of composite soil samples within the interval of 0-2 ft bgs at selected target properties.
- Collection of background samples within 0-2 ft bgs using the same methodology as the field samples.

- Collection of grab samples of soil and/or ABG material from excavations where utility work is being conducted and ABG is observed
- Containment and staging of IDW
- Collecting archive samples of target fill material/glass
- Field documentation, including boring/sampling logs, photographs, and sample location coordinates
- Collection of waste characterization samples

4.2.1.1 Installation

The proposed sampling locations will be located in the field via hand-held GPS (**Section 4.3 Site Survey**). Locations may be adjusted in the field based on real-time observations. Any significant adjustments will be discussed with NYSDEC prior to any changes.

Prior to intrusive work Dig Safe NY will be notified to identify underground utilities or buried obstructions at each proposed boring location as described in **Section 4.1.1 Geophysical Investigation**.

As previously noted in **Section 3.2 Emerging Contaminants**, care will be taken to prevent cross contamination of samples, especially introduction of emerging contaminants, into the samples. Necessary equipment, material, and supplies will be compatible for collection of emerging contaminant samples (e.g., PFAS-free).

Soil borings will be advanced via hand auger. The auger will be turned slowly and not forced through the soil. It is recommended that an auger without sharp points be used.

Soil samples will be collected and logged continuously until borings are terminated. Soils will be visually classified using the Burmister (1970) and USCS (ASTM International 2018) soil classification systems. Soil descriptions will be recorded in the field notes or soil boring log form. Any non-native material present in the soil samples will be noted and described (type, color, texture, moisture content, etc.) and any layer of fill material containing ash, brick and/or glass will be noted in the field logs. Photographs of recovered soils and any fill material containing ash, brick, and/or glass will be taken to provide in the final report. Each soil sample will also be screened for the presence of VOCs with a photoionization detector (PID) and readings will be recorded on the boring log and/or field book.

Sampling equipment will be decontaminated between soil boring locations by washing equipment using a phosphate-free cleaning solution (e.g., Alconox) along with a distilled water rinse.

Decontamination rinsates will be containerized in 55-gallon steel drums and transported to a central waste staging area for further characterization and disposal.

4.2.1.2 Sampling

Surface soil sampling will consist of collecting multi-point composite surface soil samples. Two sample depths are assumed per sample area/location (0-6 inches and 6-24 inches). Sub-sample locations will all be located within 200 feet of the residence or school structure and within the property boundary. If ABG is observed at a property, the composite sub-sample locations will be selected to incorporate areas of observed ABG Additional samples may be collected outside of the property boundary (e.g., within a ROW) or greater than 200 feet from the residence or school structure (e.g., if ABG is observed).

The analytes for the soil borings and surface soil sampling are shown on **Table 1**. All surface soil samples will be analyzed for total metals (including mercury and boron) and approximately 20 percent of properties will have at least one sample analyzed for SVOCs (including 1,4-dioxane) and PFAS, focused on samples containing ABG. TCLP analysis will be performed on all IDW samples.

Archive samples will be collected if target fill material/waste glass is encountered, as described in the *NYSDEC Corning Area Glass Sampling Standard Operating Procedure* (Parsons 2021a). The location of borings, including those where ABG is encountered, and the location of any ABG observed at the surface will be documented using a hand-held GPS (**Section 4.3 Site Survey**). Photographs of recovered soils and any fill material containing ABG, as well as any ABG observed at the surface will be taken.

Upon completion of sampling, each shallow soil boring will be backfilled with soil remaining after sampling and additional topsoil if needed, from total depth to surface and restored to conditions prior to intrusive activities. Care will be taken to preserve the grass or sod overlying the target interval during sample collection. The sampler will regrade the sample area by hand, as needed, and replace the surficial layer of grass or sod following sampling.

The background soil samples will be collected from the same depths using the same methodology and equipment as the field samples and analyzed by the same laboratory. Specific background locations within identified background properties will be selected to avoid potential sources of contamination in the area (e.g., building driplines, low lying areas where stormwater runoff and sediment would accumulate, etc.).

4.3 Site Survey

A handheld GPS unit will be used to collecting the following as-built data for soil borings and surface soil sample locations:

- Northing
- Easting
- Ground surface elevation

Horizontal survey data will be based on the North American Datum of 1983 (NAD 83) New York State Plane (Central Zone) coordinate system (in feet). Elevations will be based on the North American Vertical Datum of 1988 (NAVD 88).

4.4 Waste Handling

Investigation-derived waste (IDW), including excess soils from sample locations, decontamination rinsates, and other used materials (such as PPE, poly sheeting, etc.) will be placed in Department of Transportation-approved 55-gallon 17-H type drums. The IDW will be classified as hazardous or non-hazardous based on characterization results and will be disposed of in accordance with applicable NYSDEC regulations. Appropriate equipment capable of handling and/or moving IDW stored to the designated waste storage area will be used, and IDW drums will be transported to a central staging area for characterization. Drums will be stored in an area lined with polyurethane sheeting for secondary containment.

SECTION 5 REPORT PREPARATION

Data obtained during the field investigations identified in this scope of work will be validated (Category B) and included in the GIS database that will be shared in the Site Management dashboard. Chemical analytical results for soil will be compared to 6 NYCRR Part 375 *Soil Cleanup Objectives* (NYSDEC, 2006) guidelines for various potential future land uses and applicable USEPA standards and guidelines. Data will be evaluated to determine if further investigation should be conducted.

Parsons will develop interim deliverables throughout the investigation phase. A final report will be prepared at the end of the project summarizing all of the data collected during the AWS field activities described in this work plan.

SECTION 6 SCHEDULE

Following approval of this Work Plan by NYSDEC, the estimated schedule shown below will be implemented. The schedule is subject to change given the complexity of this project and coordination required to select specific properties and acquire property access. Parsons will provide a detailed monthly update to the NYSDEC regarding the proposed schedule.

Task Name	Start	Finish
Coordinate Property Access	Q1 2023	Q2 2023
Utility Demarcation, Sample Location Mark-Out and Soil Sampling	Q2 2023	Q4 2023
Data Management and Reporting Tasks	3 months after completion of field activities	

SECTION 7 REFERENCES

ASTM International. 2018. ASTM D2487-11. *Standard Practice for Classification of Soils for Engineering Purposes (Unified Soil Classification System)*. DOI: 10.1520/D2487–11. West Conshohocken, PA.

Burmister, D.M. 1970. "Suggested Methods of Test for Identification of Soils." in *Special Procedures for Testing Soil and Rock for Engineering Purposes: Fifth Edition.* Editor(s): ASTM Committee D-18. STP38522S. January 1. pp. 311-323. DOI: 10.1520/STP38522S.

NYSDEC. 2006. Subpart 375-6 "Remedial Program Soil Cleanup Objectives" in *6 NYCRR Part 375 Environmental Remediation Programs.* New York State Department of Environmental Conservation. Effective December 14. https://www.dec.ny.gov/docs/remediation_hudson_pdf/part375.pdf

NYSDEC. 2010. DER-10, *Technical Guidance for Site Investigation and Remediation.* New York State Department of Environmental Conservation Program Policy. Issued May 3, 2010, with latest update April 9, 2019. https://www.dec.ny.gov/docs/remediation_hudson_pdf/der10.pdf

NYSDEC. 2022. *Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC's Part 375 Remedial Programs*. New York State Department of Environmental Conservation. November. https://www.dec.ny.gov/docs/remediation_hudson_pdf/pfassampanaly.pdf

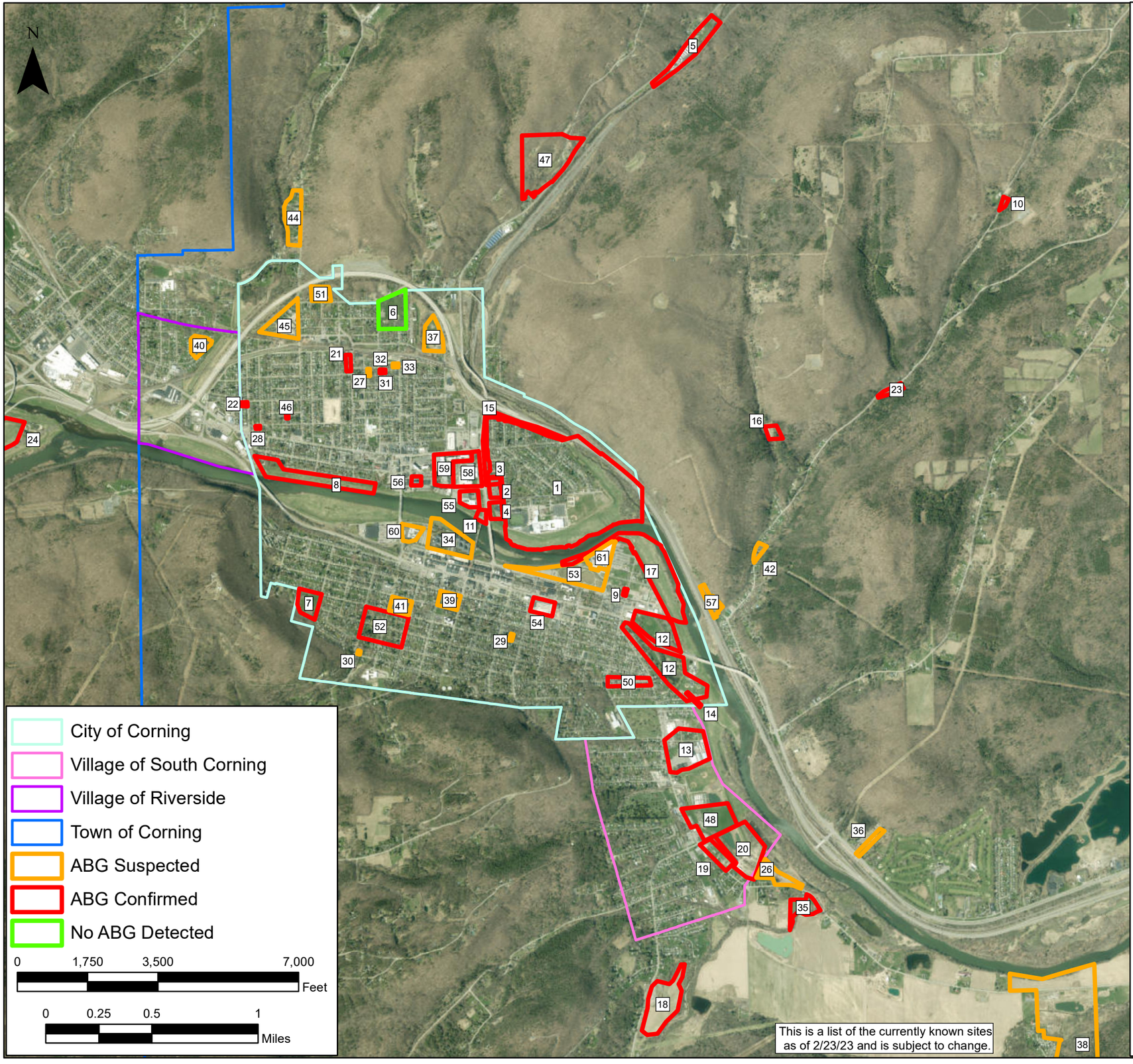
Parsons. 2020. *Field Activities Plan*. Prepared by Parsons for the New York State Department of Environmental Conservation Environmental Cleanup Program. April.

Parsons. 2021a. *NYSDEC Corning Area Glass Sampling Standard Operating Procedure.* Prepared by Parsons for the New York State Department of Environmental Conservation. August.

Parsons. 2021b. *Project Safety, Health, and Environmental Plan (PSHEP)*. Prepared by Parsons for the New York State Department of Environmental Conservation Environmental Cleanup Program. Revision date December 2021 (also revised for 2022 use).

USEPA. 2021. Draft Method 1633 Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS. DRAFT. August. https://www.epa.gov/system/files/documents/2021-09/method_1633_draft_aug-2021.pdf

FIGURE 1 CORNING AREA ABG OVERVIEW



1. Residential Study Area OUs 1 to 5 (Site # 851046)
2. Guthrie Center Way Property (Site # 851051)
3. Guthrie Clinic North (Site # 851062)
4. City of Corning Fire Department (Site # 851050)
5. Post Creek (Site # 851053)
6. Stewart Park (Site # 851060)
7. McKinney Park (Site # 851056)
8. William Street/Hillvue Park (Site # 851055)
9. 343 Woodview Avenue (Site # 851065)
10. 3510 West Road (Site # 851052)
11. Centerway Pedestrian Bridge Approach (Site # 851047)
12. Denison Park (Site #851066)
13. Vine Street (Site # 851067)
14. City of Corning Sewer Right of Way (Site # 851057)
15. Connector Street (Site # 851064)
16. 3148 Van Etten Road (Site # 851061)
17. Conhocton Street Flood Control Berm Area (Site # 851063)
18. South Corning Spoils Area (Site # 851068)
19. South Corning Road (Site # 851069)
20. River Road Spoils Area (Site # 851070)
21. Dodge Avenue (Site # 851071)
22. 29 Townsend Avenue (Site # 851072)
23. Rose Road (Site # 851073)
24. Erwin Town Landfill (Site # 851003)
25. Allen Landfill on Bailey Creek Road (Site # 851001) (not shown)
26. Allen Properties
27. 74 Sterling Street
28. 117 Fuller Avenue
29. 125 East Third Street
30. 193 West Sixth Street
31. 248 Sly Avenue
32. 250 Sly Avenue
33. 259 Bridge Street
34. Corning Incorporated Corporate Headquarters (Site # 851042)
35. 11094 River Road
36. 11425 East Corning Road
37. Baker Street/VFW/Cinderella Softball Fields
38. Brown Hollow Road
39. Canfield Park
40. Charles Street/Cutler Creek
41. Chestnut Street and West Third Street (Monkey Run)
42. College Avenue
43. Duvall Road, Dix, New York (not shown)
44. Hornby Road/Cutler Creek
45. Lamphear Court
46. 212 Oneida Place
47. Pine Hill Road
48. South Corning Driving Range
49. Town of Caton (not shown)
50. Watuaga Ave Extension
51. Winfield Elementary School
52. West 4th Street
53. Tioga Avenue Site (Site # C851031)
54. Former Corning Hospital and Related Parcels (Site # C851049)
55. Corning Family YMCA (Site # V00357)
56. Former Days Inn (Site # 851054)
57. Gibson Scrapyard (Site # 851058)
58. Steuben Glass Facility (Site # C851037B)
59. Former Fulton Finishing Plant (Site # C851037)
60. Corning Refractories Plant (Site # 851048)
61. World Kitchen, LLC (Site # 851039)

TABLE 1 ANALYTICAL DATA SUMMARY FOR SITE CHARACTERIZATION

TABLE 1
ANALYTICAL DATA SUMMARY FOR SITE CHARACTERIZATION
AREA WIDE STUDY, CORNING NEW YORK

Task	Sample Type	Analysis	Method	Turn-Around-Time	Samples	QA/QC Samples			
						Duplicate	Equipment Blank	MS	MSD
Soil Sampling[1,2]	Soil	Metals + Hg + Boron	SW6010D/SW7471B	Standard	All Samples	1 out of 20	1	1 out of 20	1 out of 20
		SVOCs+1,4-Dioxane	SW8270D	Standard	20% of Samples	1 out of 20	1	1 out of 20	1 out of 20
		PFAS	Method 1633	Standard	20% of Samples	1 out of 20	1	1 out of 20	1 out of 20
Waste Characterization Sampling	Soil	TCLP	SW1311	Standard	All Samples	0	0	0	0
		TCLP Volatiles	SW8260C	Standard	All Samples	0	0	0	0
		TCLP Semivolatiles	SW8270D	Standard	All Samples	0	0	0	0
		TCLP Pesticides	SW8081B	Standard	All Samples	0	0	0	0
		TCLP Herbicides	SW8151A	Standard	All Samples	0	0	0	0
		TCLP Metals	SW6010C/SW7470A	Standard	All Samples	0	0	0	0
		PCBs + Total	SW8082A	Standard	All Samples	0	0	0	0
		Corrosivity	SW9045	Standard	All Samples	0	0	0	0
		Ignitability	SW1030	Standard	All Samples	0	0	0	0
		Reactivity (Cyanide and Sulfide)	SW7.3.3.2/SW7.3.4.2	Standard	All Samples	0	0	0	0
	Water	VOCs	SW8260C	Standard	All Samples	0	0	0	0
		SVOCs	SW8270D	Standard	All Samples	0	0	0	0
		Pesticides	SW8081B	Standard	All Samples	0	0	0	0
		Herbicides	SW8151A	Standard	All Samples	0	0	0	0
		Total Cyanide	SW9012B	Standard	All Samples	0	0	0	0
		PCBs + Total	SW8082A	Standard	All Samples	0	0	0	0
		Metals	SW6010D/SW7470A	Standard	All Samples	0	0	0	0
		Corrosivity (pH)	SW9040	Standard	All Samples	0	0	0	0
		Flashpoint	SW1010	Standard	All Samples	0	0	0	0
		Reactivity (Cyanide and Sulfide)	SW7.3.3.2/SW7.3.4.2	Standard	All Samples	0	0	0	0

NOTES:
1. NYCRR Subpart 375 Compounds
2. Analysis of SVOCs + 1,4-dioxane and PFAS will be performed for approximately 20% of samples, focusing on samples with ABG.

ATTACHMENT 1 NYSDOH GENERIC CAMP

Appendix 1A
New York State Department of Health
Generic Community Air Monitoring Plan

Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. “Periodic” monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.

3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

Appendix 1B
Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial party performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use:

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.

2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.

3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM10) with the following minimum performance standards:

(a) Objects to be measured: Dust, mists or aerosols;
(b) Measurement Ranges: 0.001 to 400 mg/m3 (1 to 400,000 :ug/m3);
(c) Precision (2-sigma) at constant temperature: +/- 10 :g/m3 for one second averaging; and +/- 1.5 g/m3 for sixty second averaging;
(d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mmd= 2 to 3 :m, g= 2.5, as aerosolized);
(e) Resolution: 0.1% of reading or 1g/m3, whichever is larger;
(f) Particle Size Range of Maximum Response: 0.1-10;
(g) Total Number of Data Points in Memory: 10,000;
(h) Logged Data: Each data point with average concentration, time/date and data point number
(i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
(j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;
(k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
(l) Operating Temperature: -10 to 50^{o} C (14 to 122^{o} F);
(m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.

4. In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.

5. The action level will be established at 150 ug/m3 (15 minutes average). While conservative,

this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m3, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m3 above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques (see paragraph 7). Should the action level of 150 ug/m3 continue to be exceeded work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM10 at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed. Activities that have a high dusting potential--such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

7. The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

(a) Applying water on haul roads;
(b) Wetting equipment and excavation faces;
(c) Spraying water on buckets during excavation and dumping;
(d) Hauling materials in properly tarped or watertight containers;
(e) Restricting vehicle speeds to 10 mph;
(f) Covering excavated areas and material after excavation activity ceases; and
(g) Reducing the excavation size and/or number of excavations.

Experience has shown that the chance of exceeding the 150ug/m3 action level is remote when the above-mentioned techniques are used. When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

8. The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.

ATTACHMENT 2 AREA WIDE STUDY QUALITY ASSURANCE PROJECT PLAN

QUALITY ASSURANCE PROJECT PLAN (QAPP)

CORNING AREA WIDE STUDY
WA #D009811-33, NYSDEC SITE ID 851074

Prepared For:

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FEBRUARY 2023

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LIST OF ACRONYMS

ACRONYM	Definition
ASP	Analytical Services Protocol
ASTM	American Society for Testing and Materials
AWS	Area Wide Study
BFB	4-Bromofluorobenzene
ºC	degrees Celsius
CAR	Corrective Action Request
CCB	continuing calibration blank
CCS	contract compliance screening
CCV	continuing calibration verification
CFR	Code of Federal Regulations
CLP	Contract Laboratory Program
COC	chain-of-custody
D	difference, absolute
DER	New York State Department of Environmental Remediation
DFTPP	decafluorotriphenylphosphine
DOT	Department of Transportation
DQO	data quality objective
DUSR	data usability summary report
EDD	Electronic Data Deliverable
EDP	EQuIS Data Processor
EIMS	Environmental Information Management System
ELAP	Environmental Laboratory Accreditation Program
FAP	Field Activities Plan
FTL	field team leader
GC	gas chromatography
GC/MS	gas chromatography/mass spectroscopy
IC	initial calibration
ICB	initial calibration blank
ICP	inductively coupled plasma
ICV	initial calibration verification
IDL	instrument detection limit
ICP-AES	Inductively Coupled Plasma/Atomic Emission Spectroscopy
LCS	laboratory control sample
LIMS	laboratory information management system
MD	matrix duplicate
MDL	method detection limit
mg/kg	milligram per kilogram
mL	milliliter
MS	matrix spike
MSB	matrix spike blank
MS/MD	matrix spike/matrix duplicate
MS/MSD	matrix spike/matrix spike duplicate
MSD	matrix spike duplicate
NCM	Nonconformance Memo
NIST	National Institute of Standards and Technology
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
PARCCS	precision, accuracy, representativeness, completeness, comparability, and sensitivity
PE	performance evaluation
PFAS	per- and polyfluoroalkyl substances
PFOA	perflouroctanoic acid
PFOS	perfluorooctanesulfonic acid
PID	photoionization detector
PM	project manager
PQL	practical quantitation limit
PRRL	project required reporting limit
QA	quality assurance
QA/QC	quality assurance/quality control
QAO	Quality Assurance Officer
QAPP	Quality Assurance Project Plan
QC	quality control
QL	quantitation limit
R	recovery
RL	reporting limit
RPD	relative percent difference
SDG	Sample Delivery Group
SOP	standard operating procedure
SOW	scope of work
SVOC	semi-volatile organic compound
TCLP	Toxicity Characteristic Leaching Procedure
TOGS	Technical Operating Guidance Series
USEPA	United States Environmental Protection Agency
VOC	volatile organic compound
VSTR	validated time of sample receipt

SECTION 1 PROJECT DESCRIPTION

1.1 INTRODUCTION

This Quality Assurance Project Plan (QAPP) has been prepared to support soil investigation activities and specifies the quality assurance/quality control (QA/QC) procedures for field and laboratory sampling and measurements for the Corning Area Wide Study (AWS) Work Assignment issued by the New York State Department of Environmental Conservation (NYSDEC) under Superfund Standby Contract No. D009811-33 (WA #33). The specific objectives of the QAPP are:

- Foster data quality that is sufficient to meet the investigation objectives and to support the decision-making process; and
- Provide a standard for control and review of measurement data to confirm that the data are scientifically sound, representative, comparable, defensible, and of known quality.

This QAPP has been prepared in accordance with United States Environmental Protection Agency (USEPA) guidance (USEPA, 2001, 2002). Project or site specific work plans will have additional scope and quality requirements that may not be addressed in this QAPP.

Project scope and descriptions of the Corning AWS work assignment are provided in the scoping documents and work plan.

SECTION 2 PROJECT ORGANIZATION

2.1 PROJECT AND TEAM ORGANIZATION

The project organization and the function and responsibility of each group affected by the QAPP are presented in the Corning AWS Work Assignment Scoping Documents and in **Figure 2.1**. The project organization is designed to promote the exchange of information and for efficient project operation. Key contact information is also summarized in the Corning AWS Work Assignment Scoping Documents.

2.1.1 Analytical Services

The analytical laboratory (or laboratories) will analyze environmental samples collected for the Corning AWS project. Laboratory operations will be conducted under the supervision of a general manager or laboratory director and a quality assurance (QA) manager. A project manager (PM) and alternate will be assigned. The PM will be the primary point of contact and will be responsible for coordination and quality of all laboratory activities associated with the project. The laboratory's PM will manage project sample receipt, analysis scheduling, and data reporting. In case of temporary absence, the direct supervisor will assume the responsibilities of the absent employee or delegate the responsibility to qualified personnel. Sample Management Staff is responsible for receiving, logging, and maintaining internal custody of samples during the sample's residence in the laboratory. In addition, the laboratory will ensure that project analytical requirements are met; monitor project analytical compliance and immediately notify Parsons if conflict or discrepancies arise; initiate and implement appropriate corrective actions; ensure adequate quality review of deliverables prior to release; and participate in coordination meetings.

2.2 SPECIAL TRAINING/CERTIFICATION

Management and field personnel must review the requirements of this QAPP to make certain that persons assigned to specific tasks have appropriate credentials and experience. The field team leader (FTL) will check that all onsite personnel have read and understood the QAPP.

Field personnel will be required to adhere to the project Health and Safety Plan (HASP) and Field Activities Plan (FAP). They must also follow applicable task-specific health and safety plans that project subcontractors develop before they begin investigation activities.

Laboratories will have trained and experienced staff capable of performing the analyses specified in this QAPP. Laboratories will have New York State Department of Health (NYSDOH) Environmental Laboratory Accreditation Program (ELAP) certification for all project analyses where applicable. Additionally, the laboratories must be able to demonstrate that they have analyzed performance-evaluation or proficiency-testing samples within 12 months of beginning the analyses.

All personnel independent of the laboratory generating the data who are performing data validation and verification must have experience in data validation, QA oversight, and auditing. The data validator must have a Bachelor's degree in chemistry or natural sciences with a minimum of 20 credit hours in chemistry; one year experience in the implementation and application of analytical laboratory methodologies; and one year experience evaluating data packages of all matrices (e.g., soil, water, air, tissue) for compliance and usability with respect to the analytical method and the USEPA National Functional Guidelines with regional modifications.

SECTION 3 DATA QUALITY OBJECTIVES AND DATA QUALITY CRITERIA

3.1 INTRODUCTION

A systematic planning process will develop site-specific data quality objective (DQOs). These DQOs will clarify study objectives, define the appropriate type of data, and specify tolerable levels of potential errors. These parameters, in turn, will be the basis for establishing the quality and quantity of data needed to support the utility of the data. This section was prepared in accordance with USEPA Guidance for the Data Quality Objectives Process (USEPA, August 2000). Project DQOs will be developed using the "seven-step" DQO process, consisting of the following steps:

Step 1: State the problem
Step 2: Identify the decision
Step 3: Identify inputs to the decision
Step 4: Define the study boundaries
Step 5: Define the decision rule
Step 6: Specify tolerable limits of decision error
Step 7: Optimize the design

Data quality objectives specify the underlying reason for collecting the data and the data type, quality, quantity, and uses needed to make decision, and they provide the basis for designing data collection activities. DQOs and QA objectives are related data quality planning and evaluation tools for all sampling and analysis tools.

The purpose of this QAPP is to provide a standard for control and review of measurement data to ensure they are scientifically sound, representative, comparable, defensible, and of known quality. The data will be used to evaluate the physical and chemical attributes of samples collected. The project objective for analytical testing is to characterize the physical characteristics and chemical constituents and to provide data to support the decision-making process.

The data produced during sampling activities will be compared with the defined QA objectives and criteria for precision, accuracy, representativeness, completeness, comparability, and sensitivity (PARCCS) to see that the data reported are representative of actual conditions at the site.

This data assessment activity is an on-going coordinated process with data production and is intended to assure that data produced during the project are acceptable for use in subsequent evaluations. Both statistical and qualitative evaluations will be used to assess the quality of the data. The primary evaluation of the data will be based upon the field quality control (QC) samples described in Section 8.1.1 and the laboratory QC samples described in Section 8.1.2. The "blank" samples (laboratory QC blank samples and field QC blank samples) will be used to evaluate whether or not the laboratory and/or the field team's procedures for handling of samples represent a possible source of sample contamination. Laboratory duplicate sample results will be used to evaluate analytical precision. Field duplicate sample results will be used to evaluate the overall precision of the sampling and analysis process, as well as sample representativeness and site heterogeneity. Laboratory control samples will be used to evaluate the accuracy of analytical results, as will other analysis-specific criteria, such as surrogate compound recoveries for organic analyses. Matrix spike/matrix spike duplicate (MS/MSD) analysis of project samples will be used to evaluate potential sample matrix effects on the analytical results (both of the samples utilized for MS/MSD and other samples collected from the site). For all sample results, the impact of sample-specific, analysis-specific, and site-specific factors will be evaluated, and an assessment will be made

as to their impact, if any, on the data. Duplicate sample (field and laboratory QC samples) results will be used to evaluate data precision.

3.1.1 Data Use Objectives

Data use objectives define why analyses are being conducted and how ultimately the data will be used to meet the overall project objectives. For the Corning AWS activities, these project objectives are stated in the Corning AWS Scoping Documents.

3.2 DATA QUALITY OBJECTIVES (PARCCS PARAMETERS)

3.2.1 Introduction

DQOs are based on the premise that different data uses require different levels of data quality. The term *data quality* refers to a degree of uncertainty with respect to PARCCS data quality indicators. Specific objectives are established to develop sampling protocols and identify applicable documentation, sample handling procedures, and measurement system procedures. These DQOs are established by onsite conditions, objectives of the project, and knowledge of available measurement systems. Overall work assignment DQOs are presented and discussed in detail in this QAPP. A wide range of data quality is achieved through the use of various analytical methods. The following data quality levels are widely accepted as descriptions of the different kinds of data that can be generated for various purposes:

- **Level I, Field screening or analysis using portable instruments (e.g., photoionization detector [PID]):** Results are often not compound-specific but results are available in real time. Depending on the analysis being performed and the instrumentation used, the results may be considered qualitative, semi-quantitative, or quantitative.
- **Level II, Field analysis using more sophisticated portable analytical instruments (e.g., on-site mobile laboratory):** There is a wide range in the quality of data that can be generated depending on the use of suitable calibration standards, reference materials, and sample preparation equipment. Results are available in real-time or typically within hours of sample collection.
- **Level III, All analyses performed in an off-site analytical laboratory using methods other than USEPA-approved analytical methods**: These data generally do not include the level of formal documentation required under Level IV and are not subject to formal data validation. These data are typically used for engineering studies (e.g., treatability testing), site investigations and remedial design.
- **Level IV, Data generated using USEPA methods and enhanced by a rigorous QA program, supporting documentation, and data validation procedures:** These data are typically used for engineering studies (e.g., treatability testing), risk assessment, site investigations, and remedial design, and may be suitable for litigation/enforcement activities. Results are both qualitative and quantitative.

Project data quality level requirements for sample analyses have been determined to be as follows:

- Level I data quality will be obtained for field screening data collected with portable instruments such as pH meters, temperature probes, and PIDs which will be used for health and safety and field operational monitoring. In addition, these instruments or field test kits may be used to produce data for determining where to collect a sample to assess impacts and for field screening of samples to be designated for laboratory confirmation analyses.
- A Level II data QA program will be executed by the field team for obtaining data.
- A Level III data QA program will be executed by the laboratory for chemical analyses not required to be Level IV, such as pH.

- A Level IV data QA program will be executed, in general, by the laboratory for chemical analyses necessary to meet the Corning AWS work assignment objectives.

3.2.2 PARCCS Parameters (Data Quality Indicators)

3.2.2.1 Precision

Precision is an expression of the reproducibility of measurements of the same parameter under a given set of conditions. Specifically, it is a quantitative measurement of the variability of a group of measurements compared to their average value (USEPA, 1987). Precision is usually stated in terms of standard deviation, but other estimates such as the coefficient of variation (relative standard deviation), absolute difference (D), range (maximum value minus minimum value), relative range, and relative percent difference (RPD) are common.

The objectives for precision for each chemical are based on the capabilities of the approved USEPA analytical method with respect to laboratory performance. For this project, field-sampling precision will be determined by analyzing coded (blind) duplicate samples for the same parameters, and then, during data validation, calculating the %RPD for duplicate sample results. Field duplicate precision criteria for the water samples will be 30%RPD and 50%RPD for soil samples. The laboratory will determine analytical precision by calculating the %RPD or %D, as applicable to the analytical method being used, e.g., pH will be evaluated using %D.

The laboratory will determine analytical precision by calculating the RPD for the results of the analysis of the laboratory duplicates and matrix spike duplicates. The formula for calculating %RPD is as follows:

$$\%RPD = \frac{|V1 - V2|}{(V1 + V2)/2} \times 100$$

where:

RPD	=	Relative percent difference
V1, V2	=	Values to be compared
|V1 - V2|	=	Absolute value of the difference between the two values
(V1 + V2)/2	=	Average of the two values

For data evaluation purposes, in instances where both sample concentrations are less than five times (<5x) the reporting limit (RL), duplicate precision will be evaluated using the calculated %D result. In this instance, the applicable precision criterion will be two times the RL (2xRL). If a value is not detected, the %RPD criterion will be considered to be not applicable and the %RPD will not be calculated (i.e. precision will not be quantitatively determined). The data quality objectives for analytical precision, calculated as the RPD between duplicate analyses, are presented in Table 3.1.

3.2.2.2 Accuracy

Accuracy is a measure of the degree of agreement of a measured value with the true or expected value of the quantity of concern (Taylor, 1987) or the difference between a measured value and the true or accepted reference value. The accuracy of an analytical procedure is best determined by the analysis of a sample containing a known quantity of material and is expressed as the percent of the known quantity that is recovered or measured. The recovery of a given analyte depends on the sample matrix, method of analysis, and the specific compound or element being determined. The concentration of the analyte relative to the detection limit of the analytical method is also a major factor in determining the accuracy of the measurement. Concentrations of analytes that are less than the quantitation limits (QLs) are less accurate because they are more affected by such factors as instrument "noise." Higher concentrations will not be as affected by instrument noise or other variables and, thus, will be more accurate.

The objectives for accuracy for each chemical are based on the capabilities of the approved USEPA analytical method with respect to laboratory performance. Analytical accuracy is typically assessed by examining the percent recoveries of surrogate compounds that are added to each sample (organic analyses only), the percent recoveries of matrix spike compounds added to selected samples, and the percent recoveries of spike compounds added to laboratory control samples (LCS). An LCS will be analyzed to provide additional information on analytical accuracy. Additionally, initial and continuing calibrations must be performed and accomplished within the established method control limits to define the instrument accuracy before analytical accuracy can be determined for any sample set.

Accuracy is normally measured as the percent recovery (%R) of a known amount of analyte, called a *spike*, added to a sample (matrix spike or laboratory control). The accuracy on a per sample basis will be measured using surrogates for the organics analyses. The %R is calculated as follows:

Matrix Spike Recovery: $\%\ \text{Recovery} = \dfrac{SSR - SR}{SA} \times 100$

where:

%R	=	Percent recovery
SSR	=	Spike sample result: concentration of analyte obtained by analyzing the sample with the spike added
SR	=	Sample result: the background value; *i.e.,* the concentration of the analyte obtained by analyzing the sample
SA	=	Spiked analyte: concentration of the analyte spike added to the sample

Surrogate Recovery: $\%\ \text{Recovery} = \dfrac{\text{Concentration (or amount) found}}{\text{Concentration (or amount) spiked}} \times 100$

LCS Recovery: $\%\ \text{Recovery} = \dfrac{\text{Concentration (or amount) found}}{\text{Concentration (or amount) spiked}} \times 100$

The acceptance limits for accuracy for each parameter are presented in **Table 3.1**.

3.2.2.3 Representativeness

Representativeness expresses the degree to which sample data accurately and precisely represent a characteristic of a population, parameter variations at a sampling point or an environmental condition. Representativeness is a qualitative parameter and is most concerned with the proper design of the sampling program (USEPA, 1987). Samples must be representative of the environmental media being sampled. An important factor in the selection of sample locations and sampling procedures will be obtaining representative samples.

Field and laboratory procedures will be performed in such a manner as to ensure, to the degree technically possible, that the data derived represents the in-place quality of the material sampled. Care will be exercised to see that chemical compounds are not introduced to the sample from sample containers, handling, and analysis. Equipment blanks and laboratory method/prep blanks will be analyzed to monitor for potential sample contamination from field and laboratory procedures.

The assessment of representativeness also must consider the degree of heterogeneity in the material from which the samples are collected. Sampling heterogeneity will be evaluated during data validation through the analysis of coded (blind) field duplicate samples. The analytical laboratory will also follow acceptable procedures to

assure the samples are adequately homogenized prior to taking aliquots for analysis such that the reported results are representative of the sample received. Chain-of-custody (COC) procedures will be followed to document the possession of sample containers from the time of container preparation through sample collection and receipt back at the laboratory. Field QC samples will be collected and analyzed to provide information to evaluate sample representativeness. Details of field QC sample collection (rinse blanks, temperature blanks, field duplicates) and COC procedures are presented in Section 4.2 and Section 8.1.1.

3.2.2.4 Completeness

Completeness is defined as the percentage of measurements that meet the project's data quality objectives (USEPA, 1987). Completeness is calculated for each method (or analyte) and sample matrix for an assigned group of samples. Completeness for a data set represents the results usable for data interpretation and decision making. The completeness objective for the analytical and field data is 90-100%. Completeness is defined as follows for all sample measurements:

$$\%C = \frac{V}{T} \times 100$$

where:

%C = Percent completeness
V = Number of measurements judged valid (not rejected during data validation)
T = Total number of measurements

Completeness, which is expressed as a percentage, is calculated by subtracting the number of rejected and unreported results from the total planned results and dividing by the total number of results. Results rejected because of out-of-control analytical conditions, severe matrix effects, broken or spilled samples, or samples that could not be analyzed for any other reason, negatively affect influence completeness and are subtracted from the total number of results to calculate completeness.

3.2.2.5 Comparability

Comparability expresses the degree of confidence with which one data set can be compared to another (USEPA, 1987). The comparability of all data collected for this project will be managed by:

- Using identified standard methods (including laboratory standard operating procedures) for both sampling and analysis phases of this project
- Requiring traceability of all analytical standards and/or source materials to the USEPA or National Institute of Standards and Technology (NIST)
- Requiring that calibrations be verified with an independently prepared standard from a source other than that used for calibration (if applicable)
- Using standard reporting units and reporting formats including the reporting of QC data
- Performing data validation on the analytical results, including the use of data qualifiers in all cases where appropriate
- Evaluating the sample collection information and analytical QC sample results
- Requiring that the significance of all validation qualifiers be assessed any time an analytical result is used for any purpose.

By taking these steps during the investigation, future users of either the data or the conclusions drawn from them will be able to judge the comparability of these data and conclusions.

3.2.2.6 Sensitivity and Quantitation Limits

When selecting an analytical method during the DQO process, the achievable method detection limit (MDL) and method RL must be evaluated to verify that the method will meet the project QLs necessary to support project decision making requirements. This process ensures that the analytical method sensitivity has been considered and that the methods used can produce data that satisfy users' needs while making the most effective use of resources. The concentration of any one target compound that can be detected and/or quantified is a measure of sensitivity for that compound. Sensitivity is instrument-, compound-, method-, and matrix-specific and achieving the required project RL and/or MDL objectives depends on instrument sensitivity and potential matrix effects. With regard to instrument sensitivity, it is important to monitor the instrument performance to ensure consistent instrument performance at the low end of the calibration range. Instrument sensitivity will be monitored through the analysis of method/prep blanks, calibration check samples, and low standard evaluations.

Laboratories generally establish limits that are reported with the analytical results; these results may be called reporting limits, detection limits, QLs, or other terms. These laboratory-specific limits, apply undiluted analyses and must be less than or equal to the project RLs. The RL, also known as the practical quantitation limit (PQL), represents the concentration of an analyte that can be routinely measured in the sampled matrix within stated limits and with confidence in both identification and quantitation. Throughout various documents RL and PQL may be interchanged, but they effectively have the same meaning. The RLs are established based on specific knowledge about the analyte, sample matrix, project specific requirements, and regulatory requirements. The RL is typically established by the laboratory at the level of the lowest calibration standard and is generally in the range of two to ten times the MDL.

The MDL is defined as "the minimum measured concentration of a substance that can be reported with 99% confidence that the measured concentration is distinguishable from method blank results" (40 Code of Federal Regulations [CFR] Part 136, Appendix B). MDLs are experimentally determined and verified for each target analyte of the methods in the sampling program. The laboratory will determine MDLs for each analyte and matrix type prior to analysis of project samples. In addition, when multiple instruments are employed for the analysis of the same method, each individual instrument will maintain a current MDL study. MDLs are statistically calculated in accordance with the 40 CFR 136 as promulgated in September 2017. If risk-based project objectives are developed, then where practicable, MDLs must be lower than the risk-based criteria determined for the project.

Laboratory RLs and MDLs for all analyses will meet at a minimum the standards criteria specified in the NYSDEC 6 NYCRR Part 375 Soil Cleanup Objectives for Unrestricted Use and/or the NYSDEC Division of Water Technical and Operational Guidance Series (TOGS) "Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations."

All analytical results for the project will be reported to the MDL. Analytical results below the MDL will be flagged with a *U* at the RL to indicate the data are non-detect. However, the laboratory will flag analytes detected at a level less than the RL but greater than the MDL (or the laboratory's determined minimum reportable concentration) with a *J* to denote an estimated concentration for the project samples.

When results are corrected for dry weight, the reporting limits are then elevated accordingly. To compensate for the low solids, modifications are made either to increase the initial volume extracted/digested or to reduce the final volume of extract/digestate.

For samples that do not meet the project-specified RLs or MDLs, (taking into consideration elevated detection limits due to percent solids or percent moisture and aliquots used for the designated analysis), the laboratory must make available compelling documentation (e.g., screening data) and a justifiable explanation for its inability to meet the specified limits using the project protocols. It must also provide an appropriate, justifiable explanation of the issues and resolution in the analytical report/data package (dilution factor, interference, etc.). Excessive, unnecessary dilutions on any sample for a project are unacceptable. The laboratory will analyze all

samples initially undiluted, unless for gas chromatography/mass spectroscopy (GC/MS) analyses (i.e., SW8260 and SW8270), a preliminary GC-screen is performed and indicates that GC/MS instrument damage or compromise may occur if the sample is not analyzed initially at dilution. In this instance, the sample will be analyzed at the lowest possible dilution factor. If multiple extractions/ analyses are performed (such as undiluted and diluted analyses), resulting in several data sets for the same sample, the laboratory will report all data and results from each of the multiple analyses in the data package.

QLs for all definitive data quality level laboratory analytical methods, compounds, and matrices are presented in Table 3.2.

SECTION 4 DATA ACQUISITION

4.1 SAMPLING METHODS

Any non-disposable sampling equipment used for chemical sampling will be cleaned and decontaminated prior to use to prevent potential cross-contamination between each use. The project FAP documents standard operating procedures, best practices, and field decontamination methods to mitigate cross contamination. Additionally, this QAPP describes management, handling, and tracking procedures for investigation-derived waste, including solid and liquid materials, and personal protective equipment.

The special precautions described here will be taken to confirm that each sample collected is representative of the conditions at that location and that the sampling and handling procedures neither alter nor contaminate the sample. If failure in the sampling or measurement system occurs, the procedures specified in Section 10.3 of this QAPP will be followed to identify who is responsible for implementing the appropriate corrective action. This section presents sample container preparation procedures, sample preservation procedures, and sample holding times.

For this program, the laboratory will purchase and distribute certified clean sample containers with chemical preservatives. The sample containers used for chemical analysis must be virgin bottle ware, I-Chem™ Series 300 (or equivalent). Vendors are required to provide documentation of analysis for each lot of containers, and the documentation will be kept on file at the laboratory. Alternatively, the laboratory may perform testing to certify that the sample containers are not contaminated. Since the containers supplied by the laboratory will be certified clean, the bottles will not be rinsed in the field prior to use.

Laboratory-supplied sample kits (coolers containing field COC forms, custody seals, sample containers, preservatives, and packing material) will be prepared by the laboratory's Sample Management Staff and shipped to the FTL. The type of containers, required sample volumes, preservation techniques, and holding times for specific analyses are presented in **Table 4.1.**

Samples requiring chemical preservation will be collected in sample containers provided by the analytical laboratory that already contain sufficient quantities of the appropriate preservative(s) to ensure that the sample is kept in accordance with the method requirements. The laboratory must provide an adequate amount of pre-preserved bottles with traceable high-purity preservatives, and additional preservative for use if the added amount is not sufficient, based on request by the FTL and on an as-needed basis if additional bottle ware is needed during the field activities. The field team must verify that the preservative has been added appropriately.

4.2 SAMPLE HANDLING AND CUSTODY

This section presents sample handling and custody procedures for both the field and laboratory. Implementation of proper handling and custody procedures for samples generated in the field is the responsibility of field personnel. Both laboratory and field personnel involved in the chain of custody and transfer of samples will be trained as to the purpose and procedures prior to implementation. For transfer of samples within the laboratory, an internal chain of custody will be required.

4.2.1 Sample Handling

Samples to be collected for the Corning AWS work assignment are specified in the work plan and FAP. After the samples are collected, they will be split as necessary among preserved containers appropriate to the parameters

to be analyzed. Each container will be provided with a sample label that will be filled out at the time of collection. The sampler will print label information, specified below, on each label either before or immediately after collecting the sample with an indelible writing instrument. The label will be protected from water and solvents with clear label packing tape.

The following information, at a minimum, is required on each sample label (note: the location ID and the sample ID as described in the Data Management section below inherently identify some of this information, see below):

- Client
- Project name
- Sampling location
- Sample number
- Date and time of sample collection
- Parameters to be analyzed
- Preservative(s) added, if any
- Initials of the sampler.

Following sample collection, excess soil, water, etc., will be wiped from the outside of the sample containers with a paper towel and the lids will be checked to verify they are tightly closed. Each glass container will be wrapped with bubble wrap to minimize breakage during transport. Bottles containing soil, sediment, and water samples will be placed in separate Ziploc® bags (one bag) and set on ice (ice bath not necessary). Documentation of equipment and methods used in the field for treating the samples will be maintained in the field logs, and a chain of custody will be initiated to document transfer of the samples from the field team to the laboratory. In preparation for shipment to the analytical laboratory, the shipment cooler will be packaged as follows:

- Fill a dry shipment cooler with inert cushioning to a depth of 1 inch to prevent bottle breakage. A separate shipment cooler will be used for per- and polyfluoroalkyl substance (PFAS) samples.
- Place the bagged samples and the laboratory-provided temperature blank upright in the sample cooler. The temperature blank should be placed in the center (horizontally and vertically) with the samples surrounding.
- Place additional cushioning material around the sample bottles as necessary.
- Place bags of ice in the remaining void space to keep the samples cooled to 4°C.
- Complete the COC form (see Section 4.2.2). Place the COC form in a polyethylene, sealable bag (such as a 1-gal Ziploc® bag or equivalent) and tape the bag to the interior of the cooler lid. Field personnel retain a copy of the COC form; another copy is transmitted to the Quality Assurance Officer (QAO) and the PM specified.
- Prior to sealing for shipment, the list of samples will be checked against the container contents to verify the presence of each sample listed on the COC record including the temperature blank.
- Affix a custody seal to the cooler.
- Seal the cooler securely with packing tape, taking care not to cover labels if already present.
- Label the cooler appropriately in accordance with the Department of Transportation (DOT) regulations (49 CFR 171 through 179).
- Ship the samples in accordance with the DOT requirements outlined in 49 CFR 171 through 179. Complete the carrier bill of lading, and retain a copy on file.
- Samples will be delivered to the laboratory by the most expedient means to meet holding times. Whenever practicable, samples will be shipped on the day of collection for delivery to the laboratory the morning of the day after collection. The laboratory will be required to adhere to the holding times as stated in the NYSDEC Analytical Services Protocol (ASP) for sample analyses. Laboratory performance requirements for analysis turnaround time will be established using the validated time of sample receipt (VTSR) in accordance to NYSDEC requirements. The field team will carefully coordinate sampling activities with the laboratory to see that holding times are met.

The required holding times must be adhered to for the initial sample preparation/analysis. If subsequent reanalysis or re-extraction becomes necessary because of method requirements or additional requirements stated here, the laboratory will make every effort to perform those re-extractions and/or reanalysis within the primary holding times. Any holding time that is exceeded will be reported immediately to the PM and the QAO by the laboratory QA manager.

4.2.2 Field Sample Custody

The primary objective of sample custody procedures is to create an accurate written record that can be used to trace the possession and handling of samples from the moment of their collection through analysis until their final disposition. A sample (or sample container) will be considered under custody if:

- In a person's possession
- Maintained in view after possession is accepted and documented
- Locked and tagged with custody seals placed on the sample cooler so that no one can tamper with it after having been in physical custody
- In a secured area that is restricted to authorized personnel.

The sample custody flowchart is shown in **Figure 4.1**.

DATA REQUIRED ON CHAIN-OF-CUSTODY*
Project name and client Signatures of samplers Sample number, date and time of collection, and grab or composite sample designation Signatures of individuals involved in sample transfer If applicable, the air bill or other shipping number
ADDITIONAL ITEMS THAT SHOULD BE INCLUDED:
Sample matrix Number of sample containers Analyses to be performed, Preservative(s) Name of the analytical laboratory to which the samples are sent Method of sample shipment Project number.

A COC record will accompany the samples from the time the samples leave the original sampler's possession through the sample shipments' receipt at the laboratory. Triplicate copies of the COC record must be completed for each sample set collected. See chart for data requirements. An example COC form is shown in **Figure 4.2**.

If samples are split and sent to different laboratories, a copy of the COC record is sent with each sample.

The REMARKS space on the COC form is used to indicate if the sample is a MS/MSD or matrix spike/matrix duplicate (MS/MD), or any other sample information for the laboratory. Since they are not specific to any one-sample point, blanks are indicated on separate rows. Immediately prior to sealing the sample cooler, the sampler will sign the COC form and write the date and time on the first RELINQUISHED BY space. The sampler will also write the method of shipment, the shipping cooler identification number, and the shipper air bill number on the top of the COC form. Mistakes will be crossed out with a single line in ink and initialed by the author.

Sampling personnel will retain one copy of the COC form, and the other two copies are put into a sealable plastic bag and taped inside the lid of the shipping cooler. The cooler lid is closed, custody seals provided by the laboratory are affixed to the latch and across the back and front lids of the cooler, and the person relinquishing

the samples signs his or her name across the seal. The seal is taped, and the cooler is wrapped tightly with clear packing tape. Field personnel then relinquish the cooler to personnel responsible for shipment, typically an overnight carrier.

The COC seal must be broken to open the sample cooler. Breakage of the seals before receipt at the laboratory may indicate tampering. If tampering is apparent, the laboratory will contact the FTL for direction on whether to proceed with the analyses.

Sampling personnel record the information placed on the COC record in the field logs. They also include in the log a detailed description of the exact locations from which the samples were collected, any pertinent conditions under which the samples were obtained, and the lot number of the containers used.

4.2.3 Laboratory Sample Management

The laboratory has a designated Sample Management Staff responsible for receiving samples in the laboratory, opening the coolers, checking the sample integrity and custody seals, logging samples into the laboratory information management system (LIMS), and controlling the handling and storage of samples while in the laboratory. The laboratory is a secure facility and only authorized laboratory personnel are allowed to handle active samples. The laboratory maintains a standard operating procedure (SOP) for sample management.

4.2.4 Sample Receipt and Logging

Upon receipt at the laboratory, sample-receiving personnel inspect the samples for integrity of the custody seal, check the shipment against the COC form, and note any discrepancies. Specifically, the sample-receiving personnel note any damaged or missing sample containers. At this time, the field COC record is completed and signed by the Sample Management Staff.

Using the temperature blank in each cooler, the temperature of each incoming sample cooler is measured and recorded during the sample receipt and log-in procedures before samples are placed in laboratory cold storage. Similarly, the laboratory documents that its cold storage facilities are being maintained through daily (at a minimum) documented temperature measurements using a thermometer.

Upon receipt, Sample Management Staff measure and record on the preservation documentation sheet the pH of acid- or base-preserved aqueous samples. Any problems observed during sample receipt must be communicated to the FTL and/or the QAO verbally and either by fax transmission or email within 24 hr. (preferably 3 hr. beginning with the normal business day or immediately following for problems noted during second shifts or weekends) after discovery and before samples are released to the laboratory for analysis. Problems may include but are not limited to broken bottles, errors or ambiguities in paper work, insufficient sample volume or weight, inappropriate pH, and elevated temperature.

When the shipment is inspected and the COC record agree, the sample receiving personnel enter the sample and analysis information into the LIMS and assign each sample a unique laboratory number. This number is affixed to each sample bottle.

4.2.5 Sample Storage Security

While in the laboratory, the samples and aliquots that require cold storage will be stored and will be maintained in a secured refrigerator unless they are being used for preparation and/or analysis. All of the refrigerators in the laboratory used for storage of samples have restricted access and are numbered. In addition, dedicated refrigerators are designated for extracts and analytical standards. The sample storage areas are in the

laboratory, and access is limited to laboratory personnel. Specific requirements for sample storage are described below:

- Samples will be removed from the shipping container and stored in their original containers unless damaged.
- Damaged samples will be disposed in an appropriate manner, and the disposal will be documented or repacked as necessary and appropriate.
- Samples and extracts will be stored in a secure area designed to comply with the storage method(s) defined in the contract.
- The storage area will be kept secure at all times. The sample custodian or designated personnel will monitor access to the storage area.
- Standards or reagents will not be stored with samples or sample extracts.

The following standard operating procedures for laboratory sample security will be implemented to confirm that the laboratory satisfies sample COC requirements:

- Samples will be stored in a secure area.
- Access to the laboratory will be through a monitored area. Other outside access doors to the laboratory will be kept locked.
- Visitors must sign a visitor's log and will be escorted while in the laboratory.
- Refrigerators, freezers, and other sample storage areas will be securely maintained.

Storage blanks will be initiated and analyzed on a weekly basis for each cold storage unit used to hold samples submitted for the analysis of volatile organic compounds (VOCs). Field QC samples must be stored in the same cold storage units as the samples that they are associated with (even if the matrices are different). All soil samples must undergo thorough sample homogenization (stirred within the original sample container) using inert utensils and mixing platforms that will not interfere with the target analytes being requested for analysis with the exception of soil samples submitted for the analysis of VOCs. Samples for VOC determinations will be stored in a secure refrigerator separate from other samples, sample extracts, reagents, and standards.

4.2.6 Retention and Disposal of Samples

The laboratory must retain all excess samples within their original sample bottles for a minimum of 30 days in cold storage (below 4 degrees Celsius [°C]) following submission of the validated data to NYSDEC. At that time, the laboratory must contact the FTL for authorization for responsible disposal or further storage instructions. At the point at which the laboratory is provided authorization to dispose of the samples, the laboratory will be responsible, and will assume all liability for proper characterization and disposal of samples and bottle ware in accordance with all local, state, and federal regulations.

SECTION 5 DATA MANAGEMENT

5.1 INTRODUCTION

The electronic data management systems for each work assignment will be implemented to process the information effectively without loss or alteration. As of April 1, 2011, the New York State Division of Environmental Remediation (DER) has implemented an Environmental Information Management System (EIMS). The EIMS uses the database software application EQuIS™ from EarthSoft® Inc. In an effort to improve the management of environmental data and reduce paper quantities, all laboratory analytical data minus instrument raw data must be submitted in the DEC-approved Electronic Data Deliverable (EDD).

Data providers must download and install the EQuIS Data Processor (EDP) to check their properly formatted EDD as well as the NYSDEC DER Format file. The EDP performs a series of formatting checks on the EDD and identifies any errors in the data file prior to submission. All EDDs are to be error free when submitted. It is important that the most recent version of the EDP and NYSDEC format file are employed since the valid values used by EIMS are periodically updated for the EDP.

5.2 FIELD DATA MANAGEMENT

The FTL will manage data generated in the field. He or his designee will be responsible for recording and documenting sampling activities in the field logs, on sampling records (as appropriate), and on COC forms (when samples are collected) as described in Section 4.2.2. The records may be photocopied and stored in the project file along with the original.

A sample nomenclature system will be coordinated with the Data Management Team. Each sample name will be unique to include location ID and field sample ID. The Database Manager will add data to EIMS through the input module of the system.

DATA INPUT TO EIMS MAY INCLUDE:
– Sample planning information (e.g., sample depth)
– Chain-of-custody data
– Sediment coring logs
– Geotechnical data
– Location and geographic data
– Field measurements
– Meteorological data
– Waste characterization data
– Groundwater levels
– Radiodating data
– Laboratory analytical data

5.3 LABORATORY DATA MANAGEMENT

Laboratory data management involves several important stages that include data transformation, review, verification, and validation, as well as data storage, retrieval, and security. The laboratory will implement a data management system to manage the data from its generation in the laboratory to its final reporting and storage.

The data management system will include, but not be limited to, the use of standard record-keeping practices, standard document control systems, and the electronic data management system.

The laboratory data reduction, verification, validation, and reporting procedures and project data management activities, data/information exchange procedures ensure that complete documentation is maintained, transcription and reporting errors are minimized, and data are properly review.

Specific laboratory data management requirements and procedures are discussed in Sections 6 and 9 of this QAPP.

SECTION 6 DOCUMENTS AND RECORDS

6.1 INTRODUCTION

Records will be maintained to document accurately the data generation process during investigation in the field, sample analysis in the lab, and during data validation. Project documentation will be maintained in general accordance with guidelines in the National Enforcement Investigation Center Policies and Procedures (USEPA, 1986). A project file will be maintained that will contain appropriate project documentation; see components in chart. Some of this documentation may be retained electronically in lieu of paper copies. **Table 6.1** summarizes the types of project documents and records.

MINIMUM COMPONENTS OF PROJECT FILE
- Project plans and specifications - Field logs and data records - Photographs, maps, and drawings - Sample identification documents - Chain-of-custody records - Data review notes - Report notes and calculations - Progress and technical reports and   - Correspondence and other pertinent information - Full analytical data deliverables package provided by the lab, including QC documentation and electronic data deliverable

6.2 FIELD RECORDS

Field personnel are responsible for documenting sample handling activities, observations, and data in field sampling records including field logs, COC records, photographs, and pre-design investigation records. The FTL is responsible for maintaining these documents. Each record is described below.

6.2.1 Field Log

A Field Log will be used to document pre-design investigation activities. The field log will have consecutively numbered pages, and documentation will be recorded using waterproof ink. Incomplete lines, pages, and changes in the log will be lined out with a single line, dated, and initialed. More detailed procedures for documenting investigation activities (such as field sampling records and boring log forms) and type of information to include in the field log may be developed.

MINIMUM REQUIREMENT FOR INFORMATION IN FIELD LOG
- Responsible person's name - Date and time of activity - Equipment and methods used for field preparation of samples - Field measurements of samples (*e.g.,* pH, temperature) - Information coordinating sample handling activities with appropriate field activities and COC documentation

Daily calibration activities:

- Calibrator's name
- Instrument name and model
- Date and time of calibration
- Standards used and their source
- Temperature (if appropriate)
- Results of calibration
- Corrective actions taken (if any)

6.2.2 Electronic Field Data Management

The field sampling program will have an electronic data management component. The system will be designed to specify the necessary samples taken at any given location and to provide the ability to be updated and amended in the field. This will provide a management system that efficiently tracks the needs of the sampling scope. As the samples are taken, log entries are put in the database, and sample labels are printed. At any given time a COC record can be printed as well.

6.2.3 Chain-of-Custody Record

The COC record establishes the documentation necessary to trace sample possession from the date and time of sample collection, through sample shipment, to the date and time of arrival at the laboratory designated to perform analysis. The ability to trace the history of a sample is essential to show that the sample collected was, indeed, the sample analyzed and that the sample was not subjected to biasing influences. Evidence of sample traceability and integrity is provided by COC procedures. These procedures are necessary to support the validity of the data and will accompany each shipping container.

A copy of the COC record will be detached and kept with the field log or placed in the project file; the original record will accompany the shipment.

6.3 LABORATORY RECORDS

Laboratories providing analytical support for this project must maintain records to ensure that all aspects of the analytical processes are adequately documented to ensure legal defensibility of the data.

When a mistake is made, the wrong entry is crossed out with a single line, initialed, and dated by the person making the entry, and the correct information recorded. Obliteration of an incorrect entry or writing over it is not allowed, nor is the use of correction tape or fluid on any laboratory records.

Overwriting or disposal of any electronic media prior to a 5-year expiration period is strictly prohibited. All electronic and hardcopy data must be stored in an easily accessible climate-controlled environment. The laboratory will exercise "best practices" in terms of frequent, redundant electronic backup procedures on proper long-term storage media to assure that all electronic data representing sample analyses will be maintained for the 5-year storage period. Electronic data must be stored in a secure, limited-access area with redundant copies stored in fireproof vaults and/ or stored off-site of the laboratory facilities.

Sample preparation in the laboratory must be fully documented and include sample preparation conditions (such as digestion temperatures). In addition, documentation must allow complete traceability to all prepared or purchased reagents, acids and solvents, and reference solutions. All spike solutions and calibration standards must be used prior to labeled expiration dates and stored in accordance with manufacturers recommended

conditions. Complete and unequivocal documentation must exist to enable traceability of all prepared spike solutions, calibration standards, and prepared reagents back to the reference materials utilized. Organic extracts must be stored in the same type of vials (amber or clear) as the associated standards at the appropriate storage temperatures.

The unit conventions set forth in the figures for reported data will be consistent with standard laboratory procedures. Reporting units used are those commonly used for the analyses performed. Concentrations in soil and sediment samples will be expressed in terms of weight per unit dry weight, with moisture content reported for each sample.

Laboratory records used to document analytical activities in the laboratory will include reagent and titrant preparation records, standard preparation logs, sample preparation logs, bench data sheets, instrument run logs, and strip chart recordings/chromatograms/computer output. Additional records will include calibration records, maintenance records, nonconformance memos, and Corrective Action Request (CAR) forms.

LAB RECORDS SHOULD CONVEY:
- What was done - When it was done - Who did it and - What was found

REQUIREMENTS FOR LAB RECORDKEEPING
- Data entries must be made in indelible water-resistant ink - Date of each entry and observer must be clear - Observer uses his or her full name or initials - Initial and signature log is maintained so the recorder of every entry can be identified - Information must be recorded in notebook or on other records when the observations are made - Recording information on loose pieces of paper not allowed

6.3.1 Operational Calibration Records

Operational calibration records will document the calibration of instruments and equipment that are corrected on an operational basis. Such calibration generally consists of determining instrumental response against compounds of known composition and concentration or the preparation of a standard response curve of the same compound at different concentrations. Records of these calibrations are maintained in the following documents:

- Standard preparation information, to trace the standards to the original source solution of neat compound, is maintained in LIMS or laboratory standard preparation logs.
- Instrument logbook provides an ongoing record of the calibration for a specific instrument. The logbook should be indexed in the laboratory operations records and should be maintained at the instrument by the chemist. The chemist must sign and date all entries, and the quality manager or his designee must review them.
- For Level IV data packages that are required for soil samples, copies of the raw calibration data will be kept with the analytical sample data, so the results can readily be processed and verified as one complete data package. If samples from several projects are processed together, the calibration data is copied and included with each group of data. The laboratory will maintain all calibration, analysis, and corrective action documentation (both hard copy and electronic data) for a minimum of 7 years. The documentation maintained must be sufficient to show all factors used to derive the final (reported) value for each sample. Documentation must include all calculation factors such as dilution factor, sample aliquot size, and

dry-weight conversion for solid samples. The individual who performs hand calculations must sign and date them. This documentation must be stored with the raw data. Calculations performed by the data system will be documented and stored as electronic and hard copy data. The instrument printouts will be kept on file, and the electronic data will be stored by the laboratory for a minimum of 7 years.

6.3.2 Maintenance Records

Maintenance records will be used to document maintenance activities, service procedures, and schedules. They must be traceable to each analytical instrument, tool, or gauge. The individual responsible for the instrument must review, maintain, and file these records. These records may be audited by the QAO to verify compliance. Logs must be established to record and control maintenance and service procedures and schedules.

6.3.3 Nonconformance Memos

Nonconformance Memos (NCM) may be either a hard copy record or an electronic database record. In either case, review and release of the record must be documented by the initiator, the analytical group leader where appropriate, the laboratory PM, and the laboratory QA manager. All internal laboratory nonconformance documentation will be communicated to the FTL by the laboratory PM verbally and summarized in the report narrative. The NCM will be used to document equipment that fails calibration and will identify any corrective actions taken.

6.3.4 Corrective Action Request (CAR) Forms

The laboratory must use CAR forms to document any incidents requiring corrective action. The CAR form will be issued to the personnel responsible for the affected item or activity. A copy will also be submitted to the laboratory PM. The individual to whom the CAR is addressed will return the requested response promptly to the QA personnel and will affix his or her signature and date to the corrective action block after stating the cause of the conditions and corrective action to be taken. QA personnel will maintain a log for status of CAR forms to confirm the adequacy of the intended corrective action and to verify its implementation. CARs will be retained in the project record file.

6.3.5 Analytical Data Reports

Analytical data will be reported as an Electronic Data Deliverable (EDD) and as an analytical data package. The analytical laboratories are required to submit all data, preliminary and final, in formatted EDDs in accordance with NYSDEC's requirements. The laboratory must meet 100% compliance with these requirements. The Parsons Database Manager will submit written requests dictating the requirements and appropriate files to be supplied by the laboratory. The specifications of the EDD are presented in Section 5.

Analytical data reports will be provided by the laboratory within 28 calendar days following receipt of a complete Sample Delivery Group (SDG) and will include the specifications identified in Attachment 1. An SDG is considered to include all samples received for the same project or site, to a maximum of twenty investigative samples not to exceed 5 consecutive days of sampling. The data package provided by the laboratory for soil will be Level IV data in the NYSDEC Category B format, unless an alternative requirement is specified in a laboratory statement of work (SOW) and will contain all information to support the data validation in accordance with the USEPA Region II SOPs as described in Section 9. Additionally, the completed copies of the COC records, accompanying each sample from the time of initial bottle preparation to completion of analysis, must be attached to the analytical reports for soil samples.

6.4 DATA VALIDATION AND AUDIT RECORDS

Data validation personnel are responsible for documenting validation procedures and results in the form of a data usability summary report (DUSR) for soil samples. The QAO will be responsible for maintaining this report and the QAO will be responsible for its distribution. Additionally, audit reports will be prepared and distributed by the QAO. A brief description of each record is described below.

6.4.1 Data Usability Summary Reports

The DUSR will be prepared as required by NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation, Appendix 2B, May 2010 for soil samples. The DUSR will summarize the impacts of using data that do not achieve overall data quality objectives or that do not meet PARCCS criteria identified in Section 3.3. Additionally, the report will be used to identify, assess and present issues associated with the overall data.

6.4.2 Audit Reports

Among other QA audit reports, which may be generated during the conduct of activities, a final audit report for this project may be prepared by the QAO. The report will include:

- Periodic assessment of measurement data accuracy, precision, and completeness
- Results of performance audits and/or system audits
- Significant QA problems and recommended solutions for future projects

Status of solutions to any problems previously identified.

SECTION 7 ANALYTICAL PROCEDURES

7.1 INTRODUCTION

To meet program specific regulatory requirements for chemicals of concern, all methods will be followed as stated, with some specific requirements noted below. Chemical analyses for inorganics, organics, and wet chemistry parameters will be conducted in accordance with the QAPP, the Work Assignment Scoping Documents, laboratory's SOPs (maintained "on-file" at the laboratory), and with referenced analytical methods including USEPA SW846 Test Methods for Evaluating Solid Waste, Physical, and Chemical (USEPA, 1997), and Methods for Chemical Analysis of Water and Wastes (USEPA, 1983). Where requirements conflict, the technical and QA/QC requirements in this QAPP, or the Work Assignment Scoping Documents take precedence.

7.2 STANDARD OPERATING PROCEDURES

SOPs are a written step-by-step description of laboratory operating procedures exclusive of analytical methods. Laboratories providing analytical support for this project will be required to document all procedures in SOPs. The SOPs must address the following areas:

- Storage containers and sample preservatives
- Sample receipt and logging
- Sample custody
- Sample handling procedures
- Sample transportation
- Glassware cleaning
- Laboratory security
- QC procedures and criteria
- Equipment calibration and maintenance
- Documentation
- Safety
- Data handling procedures
- Document control
- Personnel training and documentation
- Sample and extract storage
- Preventing sample contamination
- Traceability of standards
- Data reduction and validation
- Maintaining instrument records and logbooks
- Nonconformance
- Corrective actions
- Records management

SECTION 8 QUALITY CONTROL

8.1 INTRODUCTION

A QC program is a systematic process that controls the validity of analytical results by measuring the accuracy and precision of method and matrix, developing expected control limits, using these to detect anomalous events, and requiring corrective action techniques to prevent or minimize the recurrence of these events. QC measurements for analytical protocols are designed to evaluate laboratory performance, and measurement biases resulting from the sample matrix and field performance.

- **Field performance:** QC samples are used to evaluate the effectiveness of the sampling program to obtain representative samples, eliminating any cross contamination. These samples will include field duplicates and rinse blanks.
- **Sample performance:** Factors associated with sample preparation and analysis influence accuracy and precision. Such factors are monitored by the use of internal QC samples. QC field samples are analyzed to evaluate measurement bias due to the sample matrix based on evaluation of matrix spike (MS) and matrix spike duplicate (MSD) samples. If acceptance criteria are not met, matrix interferences are confirmed either by reanalysis or by inspection of the LCS results to verify that laboratory method performance is in control. Data are reported with appropriate qualifiers or discussion.
- **Laboratory method performance:** All QC criteria for method performance should be met for all target analytes for data to be reported. These criteria generally apply to instrument detector assessment (such as, tunes, inductively coupled plasma (ICP) interference check sample), calibration, method blanks, and LCS. Variances will be documented and noted in the case narrative of the report.

8.1.1 Field Quality Control Samples

QC samples will be collected in the field as part of the sampling program to allow evaluation of data quality. Field QA/QC samples will consist of the collection and analysis of rinse blanks, field duplicates, and MS/MSD samples, at a frequency of 1:20 for each sample media. Temperature blanks will accompany each sample shipment container (cooler) shipped to the laboratory for sample analysis. Standard sample identifiers will identify field QA/QC samples and they may provide no indication of their nature as QA/QC samples.

A summary of the type and collection frequency of field QC sample to be collected respective to the sampling programs specified in this QAPP, is included in **Table 8.1**. A description of each QC sample is included below.

8.1.1.1 Equipment Rinse Blanks

To assess field sampling and decontamination performance, rinse blanks will be used to evaluate the effectiveness of the decontamination procedures for chemical sampling equipment. Rinse blanks will be collected as part of all chemical sampling programs, except for waste characterization. An equipment rinse blank (rinse blank) is a sample of deionized water provided by the laboratory that is poured over or through the sampling equipment (such as split spoon, wipe template), into the sample container. A rinse blank will be collected at a frequency of 1:20 samples per type of sample collection activity using non-disposable sampling equipment.

8.1.1.2 Field Duplicates

Coded (blind) field duplicates will be used to assess the precision of field sampling procedures. Precision of a sample is calculated by quantifying the RPD between two sample measurements (Section 3.2.2.1). If the RPD of field duplicate results is greater than the precision criterion, environmental results for the field duplicate pair will be qualified as estimated. The FTL responsible for sample collection and processing should be notified to identify the source of variability (if possible), and corrective action should be taken (Section 10.3).

Coded (blind) field duplicates will be collected to evaluate the representativeness and effectiveness of homogenization and proper mixing for soil and aqueous samples. The field duplicate will be analyzed for all of the parameters for which the associated samples are being analyzed. The samples will be labeled in such a manner that the laboratory will not be able to identify the sample as a duplicate sample. This will eliminate bias that could arise by laboratory personnel.

8.1.1.3 Temperature Blank

The temperature blank is used to indicate the temperature of the sample cooler upon receipt at the laboratory. A temperature blank consists of laboratory reagent in a 40-milliliter (mL) glass vial sealed with a Teflon® septum. Any cooler temperature exceeding the allowable $4 \pm 2°C$ must be noted and the QAO notified prior to sample analyses.

8.1.2 Laboratory Quality Control Samples

QC data from the laboratory are necessary to determine precision and accuracy of the analyses and to demonstrate the absence of interferences and contamination of glassware and reagents. The laboratory will analyze QC samples routinely as part of the laboratory QC procedures. Laboratory QC results will consist of analysis of MS/MSD, LCS, method/preparation blanks, and surrogate spikes. The frequency of the analysis of laboratory QC is summarized in **Table 8.2**. QC samples will be prepared and analyzed utilizing the same preparation and analysis procedures as the field samples. These laboratory QC sample analyses will be run independently of the field QC samples. Results of these analyses will be reported with the sample data and kept in the project QC data file. The QC checks, their frequency, acceptance criteria, and corrective actions for noncompliance are summarized for each analytical method in the laboratory's SOP.

QC samples will be prepared and analyzed utilizing the same preparation and analysis procedures as the field samples. Re-preparation and/or reanalysis of the laboratory QC samples due to a failing recovery and/or precision failure without the re-preparation and reanalysis of the associated samples is prohibited. In all events, QC failures, holding time exceedances, or any other non-standard occurrence must be communicated immediately to the QAO and prior to reporting and then, with approval to report the data, summarized in the case narrative. If the criteria are not met, appropriate corrective action must be taken as specified in Section 9.1 and Section 10.

8.1.2.1 Matrix Spike/Matrix Spike Duplicate/ Matrix Duplicates

MS/MSD samples for organics, metals, and wet chemistry parameters will be taken at a frequency of 1 per 20 field samples (per SDG) per matrix per method. A "batch" is considered up to twenty samples from the same matrix, of the same extraction/digestion type, prepared and/or analyzed by a given analyst, within 12-hr, within an extraction/digestion event, whichever is more frequent. These samples are used to assess the effect of the sample matrix on the recovery of target compounds or target analytes by spiking a normal field sample with a known concentration of the analyte of interest. Samples identified as rinse blanks will not be used for the MS/MSD preparation or analysis.

Spiked samples will be analyzed, and the percent recovery will be calculated. Results of the analysis will be used to evaluate accuracy and precision of the actual sample matrix. For MS/MSD, the result will be compared and used to evaluate the precision of the actual sample matrix. The percent recovery for each analyte in the MS and MSD should fall within the limits established by laboratory QC protocol. The percent recovery and RPD control limits between the MS and MSD and the sample and the duplicate concentrations are provided in Table 3.1.

The original sample, MS/MSD, and laboratory duplicate sample aliquots will be treated exactly the same throughout the sample preparation and analysis and will not be homogenized more than any other project sample (either in the field or at the laboratory). The spike samples will be analyzed for the same parameters as the sample. Field personnel must indicate on the COC form which sample(s) are designated as MS/MSD. If samples are not designated for these QC purposes and/or insufficient sample is available the PM and/or QAO will be notified for resolution.

8.1.2.2 Laboratory Control Samples

LCSs are designed to check the accuracy of the analytical procedure by measuring a known concentration of an analyte of interest. An LCS will be analyzed for each analytical batch requested for sample preparation and analysis. LCSs must be prepared at a frequency of one per batch for all analytical methods. If high LCS recoveries are observed and the associated samples are reported as “not detected” for the requested target analytes, no action is necessary other than to note the issue in the case narrative of the final analytical report. LCS recoveries must meet the criteria specified in the analytical method.

8.1.2.3 Method and Preparation Blanks

Laboratory blank samples (also referred to as method or preparation blanks) are designed to detect contamination resulting from the laboratory environment or sample preparation procedure. Method blanks verify that method interferences caused by contaminants in solvents, reagents, glassware, or in other sample processing hardware, are known. Method blanks will be analyzed for each analytical batch using similar preparation techniques (separatory funnel and liquid/liquid extraction) to assess possible contamination and evaluate which corrective measures may be taken, if necessary.

Method blanks associated with field samples must undergo all of the processes performed on investigative samples, including but not limited to pre-filtration and sample cleanups. The blank will be deionized water for water samples or a purified solid matrix such as sodium sulfate for extractable soil samples. Where all the field samples in a batch do not require an additional cleanup procedure, an additional blank may be prepared to check the performance of the additional cleanup and will be associated with the field samples getting the specific additional cleanup. Where this is done, both blanks will be reported, and the procedure described in the case narrative. Method blanks must be prepared at a frequency of one per analytical batch.

8.1.2.4 Surrogate Spike Analyses

Surrogate spikes (applicable to organic analysis only) are used to determine the efficiency of analyte recovery in sample preparation and analysis. Calculated percent recovery of the spikes is used to measure the accuracy of the analytical method. A surrogate spike is prepared by adding a known amount of a compound similar in type to the analytes of interest. Surrogate compounds will be added to all samples analyzed by USEPA Methods, including method blanks, MS/MSDs, project environmental samples, and duplicate samples in accordance with the method. Surrogate spike recoveries should fall within the limits established by laboratory QC protocol and the NYSDEC ASP.

8.2 INSTRUMENT/EQUIPMENT Testing, INSPECTION, AND MAINTENANCE

8.2.1 Field Equipment

Equipment failure will be minimized by routinely inspecting all field equipment to ensure that it is operational and by performing preventative maintenance procedures. Field sampling equipment will be inspected prior to sample collection activities, and repairs will be made prior to decontamination and reuse of the sampling equipment. PFAS-specific requirements for field sampling equipment are described in the FAP. Equipment, instruments, tools, gauges, and other items requiring preventive maintenance will be serviced in accordance with the manufacturer's specified recommendations and written procedure, based on the manufacturer's instructions or recommendations. Maintenance will be performed in accordance with the schedule specified by the manufacturer to minimize the downtime of the measurement system. Qualified personnel must perform maintenance work.

MINIMUM ROUTINE PREVENTIVE MAINTENANCE
Removal of foreign debris from exposed surfaces
Storage in a cool dry place protected from the elements
Daily inspections
Verification of instrument calibrations (Section 8.3.1)

A list of critical spare parts will be developed prior to the initiation of fieldwork. Field personnel will have ready access to critical spare parts to minimize downtime while fieldwork is in progress. A service contract for rapid instrument repair or backup instruments may be substituted for the spare part inventory.

Non-routine maintenance procedures require field equipment to be inspected prior to initiation of fieldwork to determine whether or not it is operational. If it is not operational, it will be serviced or replaced. Batteries will be fully charged or fresh, as applicable.

8.2.2 Laboratory Instrumentation

Periodic preventive maintenance is required for all sensitive equipment. Instrument manuals will be kept on file for reference if equipment needs repair. The troubleshooting section of factory manuals may be used in assisting personnel in performing maintenance tasks.

Major instruments in the laboratory are covered by annual service contracts with manufacturers or other qualified personnel (internal or external). Under these agreements, trained service personnel make regular preventive maintenance visits. Maintenance is documented and maintained in permanent records by the individual responsible for each instrument.

The laboratory manager is responsible for preparation, documentation, and implementation of the program. The laboratory QA manger reviews implementation to verify compliance during scheduled internal audits.

Written procedures will establish the schedule for servicing critical items to minimize the downtime of the measurement system. The laboratory will adhere to the maintenance schedule and arrange any necessary and prompt service. Qualified personnel will perform required service.

8.3 INSTRUMENT/EQUIPMENT CALIBRATION AND FREQUENCY

Instruments (field and laboratory) used to perform chemical measurements will be properly calibrated prior to use to obtain valid and usable results. The requirement to properly calibrate instruments prior to use applies equally to field instruments as it does to fixed laboratory instruments to generate appropriate data to meet DQOs.

8.3.1 Field Instruments

All field analytical equipment will be calibrated immediately prior to each day's use. The calibration procedures of field instruments (such as PID, pH, temperature), will conform to manufacturer's standard instructions to ensure that the equipment functions within the allowable tolerances established by the manufacturer and required by the project. Personnel performing instrument calibrations must be trained in its proper operation and calibration. Records of all instrument calibration will be maintained by the FTL in the field log (Section 6.2) and will be subject to audit by the QAO or authorized personnel. The FTL will maintain copies of all the instrument manuals on the site.

8.3.2 Laboratory Instruments

A formal calibration program will control instruments and equipment used in the laboratory. The program will verify that equipment is of the proper type, range, accuracy, and precision to provide data compatible with specified requirements. Instruments and equipment that measure a quantity or whose performance is expected at a stated level will be subject to calibration. Laboratory personnel or external calibration agencies or equipment manufacturers will calibrate the instruments using reference standards. Upon request, the laboratory will provide all data and information to demonstrate that the analytical system was properly calibrated at the time of analysis including calibration method, frequency, source of standards, concentration of standards, response factors, linear range, check standards, and all control limits. This data will be documented in a calibration record (Section 6.3.1). Calibration records will be prepared and maintained for each piece of equipment subject to calibration.

This section provides an overview of the practices used by the laboratory to implement a calibration program. Detailed calibration procedures, calibration frequencies, and acceptance criteria are specified in the laboratory's analytical method SOPs. The requirements for the calibration of instruments and equipment depend on the type and expected performance of individual instruments and equipment. Therefore, the laboratory will use the guidelines provided here to develop a calibration program.

Two types of calibration are described in this section: periodic calibration and operational calibration. The results of the calibration activities will be documented in the analytical data package and the calibration records (Section 6.3.1).

- **Periodic calibration:** Performed at prescribed intervals for equipment, such as balances and thermometers. In general, equipment which can be calibrated periodically is a distinct, singular purpose unit and is relatively stable in performance.
- **Operational calibration:** routinely performed as part of an analytical procedure or test method, such as the development of a standard curve for use with an atomic absorption spectrophotometer. Operational calibration is generally performed for instrument systems.

Equipment that cannot be calibrated or becomes inoperable will be removed from service. Such equipment must be repaired and satisfactorily recalibrated before reuse. For equipment that fails calibration, analysis cannot proceed until appropriate corrective action is taken, and the analyst achieves an acceptable calibration. This type of failure will be documented in an NCM (Section 10).

8.3.3 Calibration System

The calibration system includes calibration procedures, equipment identification, calibration frequency, calibration reference standards, calibration failure, and calibration records. These elements are described next.

8.3.3.1 Calibration Procedures

Written procedures will be used by the laboratory for all instruments and equipment subject to calibration. Whenever possible, recognized procedures, such as those published by the American Society for Testing and Materials (ASTM) or USEPA, will be adopted. If established procedures are not available, a procedure will be developed considering the type of equipment, stability characteristics of the equipment, required accuracy, and the effect of operational error on the quantities measured. Calibration procedure established by the laboratory must, at a minimum, meet the calibration requirements of the method on which the SOP is based.

MINIMUM CALIBRATION PROCEDURES
Equipment to be calibrated
Reference standards used for calibration
Calibration technique and sequential actions
Acceptable performance tolerances
Frequency of calibration
Calibration documentation format

8.3.3.2 Equipment Identification

Equipment that is subject to calibration is identified by a unique number assigned by the laboratory. Calibration records reference the specific instrument identification.

8.3.3.3 Calibration Frequency

Instruments and equipment will be calibrated at prescribed intervals and/or as part of the operational use of the equipment. Calibration frequency will be based on the type of equipment, inherent stability, manufacturer's recommendations, values provided in recognized standards, intended data use, specified analytical methods, effect of error upon the measurement process, and prior experience.

8.3.3.4 Calibration Reference Standards

Two types of reference standards will be used by the laboratory for calibration:

- **Physical standards**, such as weights for calibrating balances and certified thermometers for calibrating working thermometers, refrigerators and ovens, are generally used for periodic calibration. Physical reference standards that have known relationships to nationally recognized standards (such as NIST) or accepted values of natural physical constants will be used whenever possible. If national standards do not exist, the basis for the reference will be documented. Physical reference standards will be used only for calibration and will be stored separately from equipment used in analyses. In general, physical standards will be recalibrated annually by a certified external agency, and documentation will be maintained. Balances will be calibrated against class "S" weights by an outside source annually. Physical standards such as the laboratory's class "S" weights will be recertified annually.
- **Chemical standards,** such as vendor certified stock solutions and neat compounds, will generally be used for operational calibration. The laboratory, to provide traceability for all standards used for calibration and QC samples, will document standard preparation activities.

8.3.4 Operational Calibration

Operational calibration will generally be performed as part of the analytical procedure and will refer to those operations in which instrument response (in its broadest interpretation) is related to analyte concentration. Formulas used for calibration are listed in Table 8.3.

8.3.4.1 Preparation of a Calibration Curve

Preparation of a standard calibration curve will be accomplished by analyzing calibration standards that are prepared by adding the analyte(s) of interest to the solvent that is introduced into the instrument. The concentrations of the calibration standards will be chosen to cover the working range of the instrument or method. All sample measurements will be made within this working range. Average response factors will be used or a calibration curve will be prepared by plotting or regressing the instrument responses versus the analyte concentrations. Where appropriate a best-fit curve may be used for nonlinear curves and the concentrations of the analyzed samples will be back-calculated from the calibration curve.

8.3.4.2 Periodic Calibration

Periodic calibrations are performed for equipment (such as balances and thermometers), that is required in the analytical method, but that is not routinely calibrated as part of the analytical procedure. Table 8.4 lists the periodic calibration requirements used by the laboratories.

8.4 INSPECTION/ACCEPTANCE OF SUPPLIES AND CONSUMABLES

In the laboratory, personnel qualifying reagents and standards must be trained to perform the associated instrumental analysis, including instrument calibration, calculations, and data interpretation. Laboratory personnel must document the purchase, receipt, handling, storage, and tracking of supplies and consumables used during analysis. For example, analytical standards, source materials, and reference materials used for instrumental calibration/tunes/checks must be certified and traceable to the USEPA or NIST through reference numbers documented directly in each analytical sequence. Calibration for all requested analyses must be verified by an independent second source reference. Adhering to these procedures precludes the use of expired supplies and consumables or supplies and consumables that do not meet standard acceptance criteria.

Records must be maintained on reagent and standard preparation in the LIMS reagent system or laboratory standard preparation logs. The records should indicate traceability of the standards to their original source solution or neat compound, the name of the material, concentration, the method and date of preparation, the expiration date, storage conditions, and the preparer's initials. Each prepared reagent or standard should be labeled with a unique identifier that links the solution to the preparation documentation that specifies an expiration and/or re-evaluation date for the solution.

SECTION 9 DATA VALIDATION AND USABILITY ELEMENTS

9.1 DATA REVIEW, VERIFICATION, AND VALIDATION

The data collected during this project will undergo a systematic review for compliance with the DQOs and performance objectives as stated in Section 3. In particular, field, laboratory, and data management activities will be reviewed to confirm compliance with the method QC criteria for performance and accuracy and to show that data were collected in a manner that is appropriate for accomplishing the project objectives. These data will be evaluated as to their usability during data verification. In particular, data outside QC criteria, but not rejected, will be reviewed for possible high and low bias. All data will be validated following verification and reduction.

Qualified data validation personnel will assess and verify soil data and will review the data against QC criteria, DQOs (Sections 3 and 9.2.2), analytical method, and USEPA Region 2 SOPs for data review to identify outliers or errors and to flag suspect values. Field and laboratory activities that should be reviewed include, at a minimum, sample collection, handling, and processing techniques; field documentation records; verification of proper analytical methods; analytical results of QC samples; and calibration records for laboratory instruments and field equipment. A review of such elements is necessary to demonstrate whether the DQOs were met. Samples that deviate from the experimental design and affect the project objectives must be reported to the QAO and data validation personnel.

Departures from standard procedures in the FAP, this QAPP, or the laboratory SOPs, may lead to exclusion of that data from the project database or validation process based on discussions with and approval of the NYSDEC. However, routine field audits involving thorough reviews of sample collection procedures and sample documentation should preclude such deviations from occurring. Additionally, routine laboratory audits will be used to document proper sample receipt, storage, and analysis; instrument calibration; use of the proper analytical methods; and use of QC samples specified in Section 8 to assist in appropriately qualifying the data.

The laboratory's analytical report for each SDG containing soil data will be assembled by collecting and incorporating all the data for each analysis associated with the reported samples; the analytical narratives; and other report-related information such as copies of COC forms, communication records, and nonconformance forms. The information included in the analytical data report is summarized in Attachment 1.

Before the laboratory submits data, the laboratory's data review process will include a full first level "technical" review by the laboratory's analyst during sample analysis and data generation. The review must include a check of all QC data for errors in transcription, calculations, and dilution factors and for compliance with QC requirements. Failure to meet method performance QC criteria may result in the reanalysis of the sample or analytical batch. After the initial review is completed, the data will be collected from summary sheets, workbooks, or computer files and assembled into a data package.

The laboratory's first review will be followed by a second-level technical review of the data package. The second level review may be performed by a peer trained in the procedures being reviewed or by the appropriate analytical group supervisor. The reviewer will check the data packages for completeness and compliancy with the project requirements and will certify that the report meets the DQOs for PARCCS specifications. The report narrative will be generated at this stage of the data review. Any problems discovered during the review and the corrective actions necessary to resolve them will be communicated to the responsible individual, who will discuss the findings with the laboratory QA manager for resolution.

The first and second review will be conducted throughout sample analysis and data generation to validate data integrity during collection and reporting of analytical data. Data review checklists will be used to document the performance and review of the QC and analytical data.

Before the laboratory's final release to the client, the data will undergo a final review by the laboratory's QA officer or his/her designee. This third level review is to confirm that the report is complete and meets project requirements for performance and documentation. The laboratory's QA officer must review reports involving non-conforming data issues. A summary of all non-conformances will be included in the case narrative. The report will then be released to the client for data validation, and a copy will be archived by the laboratory for a period of 7 years.

The laboratory analytical soil data will be validated using project-specific data validation procedures to confirm that data meet the applicable data quality objectives. Depending on the type of data and the intended data uses, the data validation process for a given SDG (or a specific percentage of sample analyses) or analytical method may be performed following a Level IV protocol (full validation or USEPA Stage 3 data validation), or a Level III protocol (sample plus QC summary data only, no raw data review, or USEPA Stage 2B data validation). The project-specific Level III data validation protocol will provide a level of review resulting in the generation of a data usability summary report (DUSR), as defined by NYSDEC. Level III validation will be performed on all DQO Level III and all DQO Level IV data. Ten percent (10%) of the DQO Level IV Data for each analytical method will undergo a Level IV validation. Certain geotechnical and field screening data may be evaluated in a manner suitable for the intended data uses.

A data validation report will be issued and reviewed by the QAO before finalization. The data validation report will present the results of data validation, including a summary assessment of laboratory data packages, sample preservation and COC procedures, and a summary assessment of PARCCS criteria for each analytical method. The validation criteria are objective and are not sample dependent, except for consideration of sample matrix effects. The criteria specify performance requirements that should be under the control of the field-sampling contractor or analytical laboratory. This QAPP will be the primary reference for evaluating the data.

After data validation, the data will be evaluated for consistency with site conditions and developed conceptual models. Data validation personnel will prepare a project DUSR that summarizes the implications of the use of any soil data out of criteria. In addition, the data usability report will include the percentage of sample completeness for critical and non-critical samples and a discussion of any issues in representativeness of the data that may develop as a result of validation. The data usability report will address overall data quality and achievement of PARCCS criteria and assess issues associated with the overall data and data quality for all validated Level III and Level IV data.

9.2 VERIFICATION AND VALIDATION METHODS

9.2.1 Laboratory

The laboratory will verify and assess analytical data against the stated requirements on the COC record, the sample handling procedures (Section 4), and the QC parameters. The laboratory data reviewers will also check that transcriptions of raw or final data and calculations were performed correctly and are verified.

Following data verification, analytical data generated by the laboratory will be reduced and managed based on the procedures specified in this QAPP and analytical methodologies. Data reduction includes all processes that change either the values or numbers of data items. The data reduction processes used in the laboratory includes establishment of calibration curves, calculation of sample concentrations from instrument responses, and computation of QC parameters. **Table 8.5** lists the formulas used to calculate sample concentrations.

The reduction of instrument responses to sample concentrations takes different forms for different types of methods. For most analyses, the sample concentrations are calculated from the measured instrument responses using a calibration curve. The sample concentrations can be back-calculated from a regression equation fitted to calibration data. For gravimetric and titrimetric analyses, the calculations are performed according to equations given in the method. For chromatographic analyses, the unknown concentrations are determined using either calibration factors (external standard procedure) or relative response factors (internal standard procedure). GC analyses are generally quantitated using the external standard technique; GC/MS analyses are quantitated using the internal standard technique. These calculations are generally performed by the associated computerized data systems.

Validated analytical data will be loaded into a database and reported in tabular format. Database fields will include the field sample identification, laboratory sample identification, blinded sample number, analytical results, detection limits, and validation qualifiers. The usability of the data will be evaluated by the QAO or designee.

9.2.2 Analytical Data Validation

The data review process is performed in two phases:

1. **Initial phase, contract compliance screening (CCS)**: Review of sample data deliverables for completeness. Completeness is evaluated by ensuring that all required data deliverables are received in a legible format with all required information. The CCS process also includes a review of the COC forms, case narratives, and RLs. Sample resubmission requests, documentation of nonconformances with respect to data deliverable completeness, and corrective actions often are initiated during the CCS review. The results of the CCS process are incorporated into the data validation process.
2. **Second phase, data validation:** A project-specific data validation procedure based on a "Level III" or the "Level IV" validation protocol will be performed on the analytical results from the fixed-base laboratory or laboratories. The Level III validation protocol (i.e., USEPA Stage 2B data validation), which applies to data packages not receiving "full" Level IV validation includes a review of summary information to determine adherence to analytical holding times; results from analysis of field duplicates, method blanks, equipment blanks, surrogate spikes, MS/MSDs, LCSs, and sample temperatures during shipping and storage. Data qualifiers are applied to analytical results during the data validation process based on adherence to method protocols and laboratory-specific QA/QC limits. The Level IV validation protocol (i.e., USEPA Stage 3 data validation) incorporates the Level III validation protocol and adds calculation checks from the raw data of reported and summarized sample data and QC results.

The laboratory will send the required analytical data package deliverables and the EDD following completion of the laboratory's validation process (Section 9.2.2). Data validation will be performed in accordance with the USEPA **Region 2 Data Validation SOPs** for organic and inorganic data review (USEPA, 2016a, 2016b, 2016c, 2016d) and the NYSDEC PFAS guidance (NYSDEC, 2021). In addition, Parsons will refer to this QAPP and the Work Assignment Scoping Documents to verify that DQOs were met. If problems are identified during data validation, the QAO and the laboratory QA manager will be alerted, and corrective actions will be requested. The laboratory PM and data validation chemists will maintain close contact with the QAO to ensure all nonconformance issues are acted upon prior to data manipulation and assessment routines.

Data validation will be conducted using the USEPA guidelines (USEPA, 2020a, 2020b) as supplementary guidelines. Where USEPA guidelines and SW-846 disagree, this QAPP and data validation professional judgment will prevail.

FULL VALIDATION (LEVEL IV)	
Organic Analytical Methods	Inorganic Constituents, Wet Chemistry Parameters
Percentage of solids Sample preservation and holding times Instrument tuning Instrument calibrations Blank results System monitoring compounds or surrogate recovery compounds (as applicable) Internal standard recovery results MS and MSD results LCS results Target compound identification Chromatogram quality Duplicate results Compound quantitation and reported RLs System performance and Results verification	Percentage of solids Sample preservation and holding times Calibrations Blank results Interference check samples (inorganics only) LCSs Project Required Reporting Limit (PRRL) standard check samples Duplicates MSs (pre-digestions and post-digestions for inorganics only) ICP serial dilutions and Results verification and reported detection limits

Trained and experienced data validation chemists will perform the data validation work. The QAO will review the data validation report before it is finalized. The data validation report will present the results of data validation, including a summary assessment of laboratory data packages, sample preservation and COC procedures, and a summary assessment of PARCCS criteria for each analytical method. A detailed assessment of each SDG will follow. Based on the results of data validation, the validated analytical results reported will be assigned a usability flag (see chart below).

USABILITY FLAGS FOR VALIDATED RESULTS	
U	Not detected at given value
UJ	Analyte not detected; associated quantitation limit is an approximate (estimated) values.
J	Estimated value
J+	Estimated biased high
J-	Estimated biased low
N	Presumptive evidence at the value given
NJ	Analysis indicates presence of analyte tentatively identified; the associated numerical value is its approximate concentration
R	Result not useable
No flag	Result accepted without qualification

9.3 RECONCILIATION WITH USER REQUIREMENTS

Following data validation by qualified personnel, the data will be evaluated by the QAO and the PM as to consistency with site conditions and developed conceptual models to determine whether field and analytical data meet the requirements for decision making. Specifically, the results of the measurements will be compared to the DQOs (Section 3).

The DQOs will be considered complete and satisfied if the data are identified as usable and if no major data gaps are identified. For example, the objective for data collected under the characterization program is to further refine the limits of dredging and/or capping. If the collected data sufficiently characterizes these limits in a manner that is acceptable for remedial action, then the DQO is satisfied. In cases where data may be considered not usable (for example, rejected during data validation), resampling may be required at a specific location. If resampling is not possible, the data will be identified and noted in the project database to make data users aware of its limitations.

SECTION 10 ASSESSMENT AND OVERSIGHT

10.1 ASSESSMENTS AND RESPONSE ACTIONS

Performance and system audits of both field and laboratory activities may be performed. Any such audits will be performed at a frequency to be determined to ensure that sampling and analysis activities are completed in accordance with the procedures specified in the FAP and this QAPP.

QA audits will be carried out under the direction of the QAO on field activities, including sampling and field measurements. They will be implemented to verify that established procedures are being followed and to evaluate the capability and performance of project and subcontractor personnel, items, activities, and documentation of the measurement system(s).

The QAO will plan, schedule, and approve system and performance audits based on procedures customized to the project requirements. If required, the QAO may request additional personnel with specific expertise from company and/or project groups to assist in conducting performance audits. Quality auditing personnel will not have responsibility for field or laboratory project work.

10.2 PROJECT-SPECIFIC AUDITS

Project-specific audits include system and performance audits of sampling and analysis procedures, and of associated recordkeeping and data management procedures. Project-specific audits will be performed on a discretionary basis at a frequency determined by the PM.

10.2.1 System Audits

The QAO may perform system audits. Such audits will encompass a qualitative evaluation of measurement system components to ascertain their appropriate selection and application. In addition, field and laboratory QC procedures and associated documentation may be system-audited including the field log, field sampling records, laboratory analytical records, sample handling, processing, and packaging in compliance with the established procedures, maintenance of QA procedures, and COC procedures. These audits may be carried out during execution of the project to confirm that sampling crews employ consistent procedures. However, if conditions adverse to quality are detected additional audits may occur.

Findings from the audit will be summarized and provided to the PM and/or designated personnel so that necessary corrective action can be monitored from initiation to closure.

10.2.2 Performance Audits

The laboratory may be required to conduct an analysis of PE samples or provide proof that PE samples were submitted by an approved USEPA or NYSDEC performance testing provider within the past 12 months. If necessary, proof that applicable PE samples have been analyzed at the laboratory within the past 12 months will be included in the laboratory procurement package.

10.2.3 Formal Audits

Formal audits are any system or performance audit that the QAO documents and implements. These audits encompass documented activities performed by qualified lead auditors to a written procedure or checklist to verify objectively that QA requirements have been developed, documented, and instituted in accordance with contractual and project criteria. At the discretion of the PM, the QAO or designated personnel may conduct formal audits on project and subcontractor work during the course of the project.

Auditors who have performed the site audit after gathering and evaluating all data will write audit reports. Items, activities, and documents determined by lead auditors to be in noncompliance must be identified at exit interviews conducted with the involved management. Noncompliance will be logged and documented through audit findings. These findings will be attached to and become part of the integral audit report. These audit-finding forms are directed to management to resolve satisfactorily the noncompliance in a specified and timely manner.

The QAO has overall responsibility to see that all corrective actions necessary to resolve audit findings are acted upon promptly and satisfactorily. Audit reports will be submitted to the PM after completion of the audit. Serious deficiencies will be reported to the PM on an expedited basis. Audit checklists, audit reports, audit findings, and acceptable resolutions will be approved by the QAO prior to issue. Verification of acceptable resolutions may be determined by re-audit or documented surveillance of the item or activity. Upon verification acceptance, the QAO will close out the audit report and findings.

10.2.4 Laboratory Audits

Internal laboratory audits will be performed routinely to review and evaluate the adequacy and effectiveness of the laboratory's performance and QA program, to ascertain if the QAPP is being completely and uniformly implemented, to identify nonconformances, and to verify that identified deficiencies are corrected. The laboratory QA manager is responsible for such audits and will perform them according to a schedule planned to coincide with appropriate activities on the project schedule and sampling plans. Such scheduled audits may be supplemented by additional audits for one or more of the following reasons:

- When significant changes are made in the QAPP
- When necessary to verify that corrective action has been taken on a nonconformance reported in a previous audit
- When requested by the laboratory's PM or QA manager.

10.2.4.1 Laboratory Performance Audits

Performance audits are independent sample checks made by a supervisor or auditor to arrive at a quantitative measure of the quality of the data produced by one section or the entire measurement process. Performance audits are conducted by introducing control samples, in addition to those used routinely, into the data production process. These control samples include PE samples of known concentrations. The results of performance audits will be evaluated against acceptance criteria. The results will be summarized and maintained by the laboratory QA manager and distributed to the supervisors who must investigate and respond to any results that are outside control limits.

10.2.4.2 Laboratory Internal Audits

The laboratory QA manager conducts routine internal audits of each laboratory section for completeness, accuracy, and adherence to SOPs. The laboratory audit team will verify that the laboratory's measurement systems are operated within specified acceptable control criteria and that a system is in place to confirm that out-of-control conditions are efficiently identified and corrected.

10.2.4.3 Laboratory Data Audits

The laboratory will maintain raw instrument data for sample analyses on magnetic tape media or optical media in a secured fireproof safe. During routine audits, the audit team will verify the processing of the raw data file by reviewing randomly selected electronic data files and comparing the results with the hardcopy report. Tapes will be archived for a period of 7 years. Tapes will be also available for audit by the QAO upon request.

10.2.4.4 Laboratory Audit Procedures

Prior to an audit, the designated lead auditor will prepare an audit checklist. During an audit and upon its completion, the auditor will discuss the findings with the individuals audited and discuss and agree on corrective actions to be initiated. The auditor will prepare and submit an audit report to the designated responsible individual of the audited group, the PM, and the QAO. Minor administrative findings that can be resolved to the satisfaction of the auditor during an audit need not be cited as items requiring corrective action. Findings that are not resolved during the course of the audit and findings affecting the overall quality of the project will be included in the audit report.

The designated responsible individual of the audited group will prepare and submit to the QAO a reply to the audit. This reply will include, at a minimum, a plan for implementing the corrective action to be taken on nonconformances indicated in the audit report, the date by which such corrective action will be completed, and actions taken to prevent reoccurrence. If the corrective action has been completed, supporting documentation should be attached to the reply. The auditor will ascertain (by re-audit or other means) if appropriate and timely corrective action has been implemented.

Records of audits will be maintained in the project files. Audit files will include, as a minimum, the audit report, the reply to the audit, and any supporting documents. It is the responsibility of the designated responsible individual of the audited group to conform to the established procedures, particularly as to development and implementation of such corrective action.

10.2.4.5 Laboratory Documentation

To confirm that the previously defined scope of the individual audits is accomplished and that the audits follow established procedures, a checklist will be completed during each audit. The checklist will detail the activities to be executed and ensure that the auditing plan is accurate. Audit checklists will be prepared in advance and will be available for review.

AUDIT CHECKLIST (AT MINIMUM)
Date and type of audit
Name and title of auditor
Description of group, task, or facility being audited
Names of lead technical personnel present at audit
Checklist of audit items according to scope of audit
Deficiencies or non-conformances

Following each system, performance, and data audit, the QAO or his designee will prepare a report to document the findings of the specific audit. The report will be submitted to the designated individual of the audited group to ensure that objectives of the QA program are met.

MINIMUM CONTENT OF AUDIT REPORT
Description and date of audit
Name of auditor
Copies of completed, signed, and dated audit form and/or checklist

Summary of findings including any nonconformance or deficiencies
Date of report and appropriate signatures
Description of corrective actions

The QAO will maintain a copy of the signed and dated report for each audit. If necessary, a second copy will be placed in project files.

10.3 CORRECTIVE ACTIONS

Corrective action procedures have been established to ensure that conditions adverse to quality, such as malfunctions, deficiencies, deviations, and errors, are promptly investigated, documented, evaluated, and corrected. Corrective action enables significant conditions adverse to quality to be noted promptly at the site, laboratory, or subcontractor location. Additionally, it allows for the cause of the condition to be identified and corrective action to be taken to rectify the problem and to minimize the effect on the data set. Further, corrective action is intended to minimize the possibility of repetition.

Condition identification, cause, reference documents, and corrective action planned to be taken will be documented and reported to the QAO, PM, FTL, and involved subcontractor management, at a minimum. Implementation of corrective action is verified by documented follow-up action. Any project personnel may identify noncompliance issues; however, the designated QA personnel are responsible for documenting, numbering, logging, and verifying the close out action. The designated responsible individual of the audited group will be responsible for ensuring that all recommended corrective actions are implemented, documented, and approved.

Events that trigger corrective actions
When predetermined acceptance standards are not attained
When a deviation from SOP is required or observed
When procedure or data compiled are determined to be deficient
When equipment or instrumentation is found to be faulty
When samples and analytical test results are not clearly traceable
When QA requirements have been violated
When designated approvals have been circumvented
As a result of system and performance audits
As a result of a management assessment
As a result of laboratory/field comparison studies
As required by analytical method

All project personnel have the responsibility, as part of normal work duties, to promptly identify, solicit approved correction, and report conditions adverse to quality. Specifically, the laboratory must designate the assigned individual to act as the primary laboratory contact responsible for timely identification and resolution of any and all issues including contract and administrative issues. Any phone calls initiated by personnel or designated representatives to the laboratory with respect to corrective actions must be returned in a timely manner on a normal business day if the designate individual (or alternate) is not available at the initiation of the phone call.

Project management and related staff, including field investigation teams, remedial design planning personnel, and laboratory groups will monitor on-going work performance as part of daily responsibilities. Work may be audited at the site, the laboratories, or subcontractor locations. Activities or documents ascertained to be noncompliant with QA requirements will be documented. Corrective actions will be mandated through audit

finding sheets attached to the audit report. Audit findings are logged, maintained, and controlled by the QAO, PM, or designated personnel.

Personnel assigned to QA functions will have the responsibility to issue and control CAR forms (**Figure 10.1**). The CAR identifies the out-of-compliance condition, reference document(s), and recommended corrective action(s) to be administered.

Similar to the CAR, the laboratory will record and report nonconformances internally using the laboratory's non-conformance documentation tracking system in the form of an NCM. Each NCM is traceable so that it can be cross-referenced with its resolution to the associated project records. The laboratory QA manager summarizes critical nonconformances, such as reissued reports and client complaints, in a monthly report to the laboratory management staff. Management of the NCM is described in Section 6.3. Corrective action procedures applicable to QC requirements that do not meet the criteria of this QAPP are described in the following sections. Consistent, frequent contacts between laboratory personnel, the QAO, or designated personnel are required.

TYPICAL CONTENT OF NCM FORMS
Problem description and root cause
Corrective action
Client notification summary
QA verification
Approval history action

SECTION 11 REPORTS TO MANAGEMENT

11.1 QA REPORTS

Management personnel receive QA reports appropriate to their level of responsibility. The PM receives copies of all QA documentation. QC documentation is retained within the department that generated the product or service except where this documentation is a deliverable for a specific contract. QC documentation is also submitted to the project QAO for review and approval. Previous sections detailed the QA activities and the reports, which they generate. Among other QA audit reports that may be generated during the conduct of activities, a final audit report for this project will be prepared by the QAO. The report will include:

- Periodic assessment of measurement data accuracy, precision, and completeness
- Results of performance audits and/or system audits
- Significant QA problems and recommended solutions for future projects
- Status of solutions to any problems previously identified.

Additionally, any incidents requiring corrective action will be fully documented.

SECTION 12 REFERENCES

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TABLES

TABLE 3.1 QUALITY CONTROL LIMITS FOR PROJECT SAMPLES

			Laboratory Accuracy and Precision				
Analytical Parameters	**Analytical Method**	**Spike Compound**	**MS/MSD % Recovery**	**MS/MSD RPD or Lab Dup RPD**	**LCS % Recovery**	**Surrogate Compounds**	**Surrogate % Recovery**
TCLP VOCs	SW8260D	All Target Analytes	Lab QC limit	0-20 or lab QC limit	70-130 or lab QC limit	Toluene-d8 4-Bromofluorobenzene 1,2-Dichloroethane-d4 Dibromofluoromethane	Lab QC Limit
SVOCs + TCLP SVOCs + 1,4-dioxane	SW8270E	All Target Analytes	lab QC limit	0-20 or lab QC limit	70-130 or lab QC limit	Nitrobenzene-d5 2-Fluorobiphenyl Terphenyl-d14 Phenol-d5 2-Fluorophenol 2,4,6-Tribromophenol	Lab QC Limit
PFAS	1633	All Target Analytes	70-130 or lab QC limit	0-20 or lab QC limit	70-130 or lab QC limit	Isotope Dilution PFAS	Lab QC Limit
Metals + TCLP Metals	SW6010D SW7470A SW7471B	All Target Analytes	75-125 80-120 (mercury)	0-20	85-115	NA	NA
TCLP Pesticides	SW8081B	All Target Analytes	Lab QC limit	0-20 or lab QC limit	70-130 or lab QC limit	Decachlorobiphenyl Tetrachloro-m-xylene	Lab QC Limit
TCLP Herbicides	SW8151A	All Target Analytes	Lab QC limit	0-20 or lab QC limit	70-130 or lab QC limit	2,4-Dichlorophenylacetic acid	Lab QC Limit

NOTES: MS/MSD – Matrix spike/matrix spike duplicate

RPD – Relative Percent Difference

LCS – Laboratory Control Sample

NA – Not applicable

TABLE 3.2A
QUANTITATION LIMITS FOR SOIL SAMPLES
CORNING AREA WIDE STUDY

		Analytical Method	6 NYCRR Part 375 Soil Cleanup Objective (SCO) for Unrestricted Use [1]	Guidelines for Sampling and Analysis of Per- and Polyfluoroalkyl Substances (PFAS) [2]	QAPP Quantitation Limit [3]	UNITS
SEMIVOLATILES						
123-91-1	1,4-DIOXANE	SW8270E	100	N/A	330	µg/kg
58-90-2	2,3,4,6-TETRACHLOROPHENOL	SW8270E	NS	N/A	660	µg/kg
95-95-4	2,4,5-TRICHLOROPHENOL	SW8270E	NS	N/A	660	µg/kg
88-06-2	2,4,6-TRICHLOROPHENOL	SW8270E	NS	N/A	660	µg/kg
120-83-2	2,4-DICHLOROPHENOL	SW8270E	NS	N/A	660	µg/kg
105-67-9	2,4-DIMETHYLPHENOL	SW8270E	NS	N/A	660	µg/kg
51-28-5	2,4-DINITROPHENOL	SW8270E	NS	N/A	660	µg/kg
121-14-2	2,4-DINITROTOLUENE	SW8270E	NS	N/A	330	µg/kg
606-20-2	2,6-DINITROTOLUENE	SW8270E	NS	N/A	330	µg/kg
91-58-7	2-CHLORONAPHTHALENE	SW8270E	NS	N/A	330	µg/kg
95-57-8	2-CHLOROPHENOL	SW8270E	NS	N/A	660	µg/kg
91-57-6	2-METHYLNAPHTHALENE	SW8270E	NS	N/A	330	µg/kg
95-48-7	2-METHYLPHENOL (O-CRESOL)	SW8270E	330	N/A	660	µg/kg
88-74-4	2-NITROANILINE	SW8270E	NS	N/A	330	µg/kg
88-75-5	2-NITROPHENOL	SW8270E	NS	N/A	660	µg/kg
91-94-1	3,3'-DICHLOROBENZIDINE	SW8270E	NS	N/A	330	µg/kg
99-09-2	3-NITROANILINE	SW8270E	NS	N/A	330	µg/kg
106-44-5	3&4-METHYLPHENOL (M&P-CRESOL)	SW8270E	330	N/A	660	µg/kg
534-52-1	4,6-DINITRO-2-METHYLPHENOL	SW8270E	NS	N/A	660	µg/kg
101-55-3	4-BROMOPHENYL PHENYL ETHER	SW8270E	NS	N/A	330	µg/kg
59-50-7	4-CHLORO-3-METHYLPHENOL	SW8270E	NS	N/A	660	µg/kg
106-47-8	4-CHLOROANILINE	SW8270E	NS	N/A	330	µg/kg
7005-72-3	4-CHLOROPHENYL PHENYL ETHER	SW8270E	NS	N/A	330	µg/kg
100-01-6	4-NITROANILINE	SW8270E	NS	N/A	330	µg/kg
100-02-7	4-NITROPHENOL	SW8270E	NS	N/A	660	µg/kg
83-32-9	ACENAPHTHENE	SW8270E	20,000	N/A	330	µg/kg
208-96-8	ACENAPHTHYLENE	SW8270E	100,000	N/A	330	µg/kg
98-86-2	ACETOPHENONE	SW8270E	NS	N/A	330	µg/kg
120-12-7	ANTHRACENE	SW8270E	100,000	N/A	330	µg/kg
1912-24-9	ATRAZINE	SW8270E	NS	N/A	330	µg/kg
100-52-7	BENZALDEHYDE	SW8270E	NS	N/A	330	µg/kg
56-55-3	BENZO(A)ANTHRACENE	SW8270E	1000	N/A	330	µg/kg
50-32-8	BENZO(A)PYRENE	SW8270E	1000	N/A	330	µg/kg

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TABLE 3.2A
QUANTITATION LIMITS FOR SOIL SAMPLES
CORNING AREA WIDE STUDY

		Analytical Method	6 NYCRR Part 375 Soil Cleanup Objective (SCO) for Unrestricted Use [1]	Guidelines for Sampling and Analysis of Per- and Polyfluoroalkyl Substances (PFAS) [2]	QAPP Quantitation Limit [3]	UNITS
205-99-2	BENZO(B)FLUORANTHENE	SW8270E	1000	N/A	330	µg/kg
191-24-2	BENZO(G,H,I)PERYLENE	SW8270E	100,000	N/A	330	µg/kg
207-08-9	BENZO(K)FLUORANTHENE	SW8270E	800	N/A	330	µg/kg
85-68-7	BENZYL BUTYL PHTHALATE	SW8270E	NS	N/A	330	µg/kg
92-52-4	BIPHENYL (DIPHENYL)	SW8270E	NS	N/A	330	µg/kg
111-91-1	BIS(2-CHLOROETHOXY) METHANE	SW8270E	NS	N/A	330	µg/kg
111-44-4	BIS(2-CHLOROETHYL) ETHER	SW8270E	NS	N/A	330	µg/kg
108-60-1	BIS(2-CHLOROISOPROPYL) ETHER	SW8270E	NS	N/A	330	µg/kg
117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE	SW8270E	NS	N/A	330	µg/kg
105-60-2	CAPROLACTAM	SW8270E	NS	N/A	330	µg/kg
86-74-8	CARBAZOLE	SW8270E	NS	N/A	330	µg/kg
218-01-9	CHRYSENE	SW8270E	1000	N/A	330	µg/kg
53-70-3	DIBENZ(A,H)ANTHRACENE	SW8270E	330	N/A	330	µg/kg
132-64-9	DIBENZOFURAN	SW8270E	700	N/A	330	µg/kg
84-66-2	DIETHYL PHTHALATE	SW8270E	NS	N/A	330	µg/kg
131-11-3	DIMETHYL PHTHALATE	SW8270E	NS	N/A	330	µg/kg
84-74-2	DI-N-BUTYL PHTHALATE	SW8270E	NS	N/A	330	µg/kg
117-84-0	DI-N-OCTYLPHTHALATE	SW8270E	NS	N/A	330	µg/kg
206-44-0	FLUORANTHENE	SW8270E	100,000	N/A	330	µg/kg
86-73-7	FLUORENE	SW8270E	30,000	N/A	330	µg/kg
118-74-1	HEXACHLOROBENZENE	SW8270E	330	N/A	330	µg/kg
87-68-3	HEXACHLOROBUTADIENE	SW8270E	NS	N/A	330	µg/kg
77-47-4	HEXACHLOROCYCLOPENTADIENE	SW8270E	NS	N/A	330	µg/kg
67-72-1	HEXACHLOROETHANE	SW8270E	NS	N/A	330	µg/kg
193-39-5	INDENO(1,2,3-C,D)PYRENE	SW8270E	500	N/A	330	µg/kg
78-59-1	ISOPHORONE	SW8270E	NS	N/A	330	µg/kg
91-20-3	NAPHTHALENE	SW8270E	12,000	N/A	330	µg/kg
98-95-3	NITROBENZENE	SW8270E	NS	N/A	330	µg/kg
621-64-7	N-NITROSODI-N-PROPYLAMINE	SW8270E	NS	N/A	330	µg/kg
86-30-6	N-NITROSODIPHENYLAMINE	SW8270E	NS	N/A	330	µg/kg
87-86-5	PENTACHLOROPHENOL	SW8270E	800	N/A	330	µg/kg
85-01-8	PHENANTHRENE	SW8270E	100,000	N/A	660	µg/kg
108-95-2	PHENOL	SW8270E	330	N/A	660	µg/kg
129-00-0	PYRENE	SW8270E	100,000	N/A	330	µg/kg

TABLE 3.2A
QUANTITATION LIMITS FOR SOIL SAMPLES
CORNING AREA WIDE STUDY

		Analytical Method	6 NYCRR Part 375 Soil Cleanup Objective (SCO) for Unrestricted Use [1]	Guidelines for Sampling and Analysis of Per- and Polyfluoroalkyl Substances (PFAS) [2]	QAPP Quantitation Limit [3]	UNITS
PFAS						
2355-31-9	2-(N-methyl perfluorooctanesulfonamido) acetic acid	EPA 1633	N/A	NS	2	µg/kg
27619-97-2	6:2 Fluorotelomer sulfonate	EPA 1633	N/A	NS	2	µg/kg
39108-34-4	8:2 Fluorotelomer sulfonate	EPA 1633	N/A	NS	2	µg/kg
2991-50-6	N-Ethyl-N-((heptadecafluorooctyl)sulphonyl) glycine	EPA 1633	N/A	NS	2	µg/kg
375-73-5	Perfluorobutanesulfonic acid (PFBS)	EPA 1633	N/A	NS	0.2	µg/kg
375-22-4	Perfluorobutanoic Acid	EPA 1633	N/A	NS	0.2	µg/kg
	Perfluorodecane Sulfonic Acid	EPA 1633	N/A	NS	0.2	µg/kg
335-76-2	Perfluorodecanoic acid (PFDA)	EPA 1633	N/A	NS	0.2	µg/kg
307-55-1	Perfluorododecanoic acid (PFDoA)	EPA 1633	N/A	NS	0.2	µg/kg
375-92-8	Perfluoroheptane Sulfonate (PFHPS)	EPA 1633	N/A	NS	0.2	µg/kg
375-85-9	Perfluoroheptanoic acid (PFHpA)	EPA 1633	N/A	NS	0.2	µg/kg
355-46-4	Perfluorohexanesulfonic acid (PFHxS)	EPA 1633	N/A	NS	0.2	µg/kg
307-24-4	Perfluorohexanoic acid (PFHxA)	EPA 1633	N/A	NS	0.2	µg/kg
375-95-1	Perfluorononanoic acid (PFNA)	EPA 1633	N/A	NS	0.2	µg/kg
754-91-6	Perfluorooctane Sulfonamide (FOSA)	EPA 1633	N/A	NS	0.2	µg/kg
1763-23-1	Perfluorooctanesulfonic acid (PFOS)	EPA 1633	N/A	0.07[4]	0.2	µg/kg
335-67-1	Perfluorooctanoic acid (PFOA)	EPA 1633	N/A	0.07[4]	0.2	µg/kg
2706-90-3	Perfluoropentanoic Acid (PFPeA)	EPA 1633	N/A	NS	0.2	µg/kg
376-06-7	Perfluorotetradecanoic acid (PFTA)	EPA 1633	N/A	NS	0.2	µg/kg
72629-94-8	Perfluorotridecanoic Acid (PFTriA)	EPA 1633	N/A	NS	0.2	µg/kg
2058-94-8	Perfluoroundecanoic Acid (PFUnA)	EPA 1633	N/A	NS	0.2	µg/kg
METALS						
7429-90-5	ALUMINUM	SW6010D	NS	N/A	10	mg/kg
7440-36-0	ANTIMONY	SW6010D	NS	N/A	6	mg/kg
7440-38-2	ARSENIC	SW6010D	13	N/A	1	mg/kg
7440-39-3	BARIUM	SW6010D	350	N/A	2	mg/kg
7440-41-7	BERYLLIUM	SW6010D	7.2	N/A	0.5	mg/kg
7440-42-8	BORON	SW6010D	NS	N/A	5	mg/kg
7440-43-9	CADMIUM	SW6010D	2.5	N/A	0.5	mg/kg
7440-70-2	CALCIUM	SW6010D	NS	N/A	100	mg/kg
7440-47-3	CHROMIUM, TOTAL	SW6010D	30	N/A	1	mg/kg

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TABLE 3.2A
QUANTITATION LIMITS FOR SOIL SAMPLES
CORNING AREA WIDE STUDY

		Analytical Method	6 NYCRR Part 375 Soil Cleanup Objective (SCO) for Unrestricted Use [1]	Guidelines for Sampling and Analysis of Per- and Polyfluoroalkyl Substances (PFAS) [2]	QAPP Quantitation Limit [3]	UNITS
7440-48-4	COBALT	SW6010D	NS	N/A	5	mg/kg
7440-50-8	COPPER	SW6010D	50	N/A	2	mg/kg
7439-89-6	IRON	SW6010D	NS	N/A	10	mg/kg
7439-92-1	LEAD	SW6010D	63	N/A	5	mg/kg
7439-95-4	MAGNESIUM	SW6010D	NS	N/A	100	mg/kg
7439-96-5	MANGANESE	SW6010D	1600	N/A	1	mg/kg
7439-97-6	MERCURY	SW7471B	0.18	N/A	0.033	mg/kg
7440-02-0	NICKEL	SW6010D	30	N/A	4	mg/kg
7440-09-7	POTASSIUM	SW6010D	NS	N/A	200	mg/kg
7782-49-2	SELENIUM	SW6010D	3.9	N/A	1	mg/kg
7440-22-4	SILVER	SW6010D	2	N/A	1	mg/kg
7440-23-5	SODIUM	SW6010D	NS	N/A	100	mg/kg
7440-28-0	THALLIUM	SW6010D	NS	N/A	1	mg/kg
7440-62-2	VANADIUM	SW6010D	NS	N/A	5	mg/kg
7440-66-6	ZINC	SW6010D	109	N/A	6	mg/kg

NOTES:

(1) Soil cleanup objectives from Table 375-6.8(b) in NYSDEC's "6 NYCRR PART 375 Environmental Remediation Programs," December 14, 2006.

(2) PFAS guidelines from NYSDEC's "Guidelines for Sampling and Analysis of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC's Part 365 Remedial Programs," June 2021.

(3) Actual laboratory reporting limit (RL) may vary. Laboratory RL or, at a minimum, the laboratory method detection limit (MDL) will meet the standard criteria.

(4) This guideline is for Synthetic Precipitation Leaching Procedure (SPLP) results and is applicable to either individual or combined concentrations of PFOA and PFOS

µg/kg Micrograms per kilogram

mg/kg Millagrams per kilogram

NS No Standard

N/A Not Applicable

TABLE 3.2B
QUANTITATION LIMITS FOR WASTE SAMPLES
CORNING AREA WIDE STUDY

CAS NO.	COMPOUND	Analytical Method	TCLP Criteria	QAPP Quantitation Limit [1]	UNITS
TCLP VOLATILES					
75-35-4	1,1-DICHLOROETHENE	SW1311/SW8260D	0.7	0.01	mg/L
107-06-2	1,2-DICHLOROETHANE	SW1311/SW8260D	0.5	0.01	mg/L
106-46-7	1,4-DICHLOROBENZENE	SW1311/SW8260D	7.5	0.01	mg/L
71-43-2	BENZENE	SW1311/SW8260D	0.5	0.01	mg/L
56-23-5	CARBON TETRACHLORIDE	SW1311/SW8260D	0.5	0.01	mg/L
108-90-7	CHLOROBENZENE	SW1311/SW8260D	100	0.01	mg/L
67-66-3	CHLOROFORM	SW1311/SW8260D	6	0.01	mg/L
78-93-3	METHYL ETHYL KETONE (2-BUTANONE)	SW1311/SW8260D	200	0.1	mg/L
127-18-4	TETRACHLOROETHYLENE (PCE)	SW1311/SW8260D	0.7	0.01	mg/L
79-01-6	TRICHLOROETHYLENE (TCE)	SW1311/SW8260D	0.5	0.01	mg/L
75-01-4	VINYL CHLORIDE	SW1311/SW8260D	0.2	0.01	mg/L
TCLP SEMIVOLATILES					
95-95-4	2,4,5-TRICHLOROPHENOL	SW1311/SW8270E	400	0.05	mg/L
88-06-2	2,4,6-TRICHLOROPHENOL	SW1311/SW8270E	2	0.05	mg/L
121-14-2	2,4-DINITROTOLUENE	SW1311/SW8270E	0.13	0.05	mg/L
95-48-7	2-METHYLPHENOL (O-CRESOL)	SW1311/SW8270E	200	0.05	mg/L
106-44-5	3&4-METHYLPHENOL (M&P-CRESOL)	SW1311/SW8270E	200	0.05	mg/L
118-74-1	HEXACHLOROBENZENE	SW1311/SW8270E	0.13	0.05	mg/L
87-68-3	HEXACHLOROBUTADIENE	SW1311/SW8270E	0.5	0.05	mg/L
67-72-1	HEXACHLOROETHANE	SW1311/SW8270E	3	0.05	mg/L
98-95-3	NITROBENZENE	SW1311/SW8270E	2	0.05	mg/L
87-86-5	PENTACHLOROPHENOL	SW1311/SW8270E	100	0.1	mg/L
110-86-1	PYRIDINE	SW1311/SW8270E	5	0.05	mg/L
TCLP PESTICIDES					
57-74-9	CHLORDANE	SW1311/SW8081B	0.03	0.01	mg/L
72-20-8	ENDRIN	SW1311/SW8081B	0.02	0.0005	mg/L
58-89-9	GAMMA BHC (LINDANE)	SW1311/SW8081B	0.4	0.0005	mg/L
76-44-8	HEPTACHLOR	SW1311/SW8081B	0.008	0.0005	mg/L
1024-57-3	HEPTACHLOR EPOXIDE	SW1311/SW8081B	0.008	0.0005	mg/L
72-43-5	METHOXYCHLOR	SW1311/SW8081B	10	0.0005	mg/L
8001-35-2	TOXAPHENE	SW1311/SW8081B	0.5	0.02	mg/L

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TABLE 3.2B
QUANTITATION LIMITS FOR WASTE SAMPLES
CORNING AREA WIDE STUDY

CAS NO.	COMPOUND	Analytical Method	TCLP Criteria	QAPP Quantitation Limit (1)	UNITS
TCLP VOLATILES					
TCLP HERBICIDES					
94-75-7	2,4-D (DICHLOROPHENOXYACETIC ACID)	SW1311/SW8151A	10	0.005	mg/L
93-72-1	SILVEX (2,4,5-TP)	SW1311/SW8151A	1	0.005	mg/L
TCLP METALS					
7440-38-2	ARSENIC	SW1311/6010D	5	0.15	mg/L
7440-39-3	BARIUM	SW1311/6010D	100	2.5	mg/L
7440-43-9	CADMIUM	SW1311/6010D	1	0.01	mg/L
7440-47-3	CHROMIUM, TOTAL	SW1311/6010D	5	0.025	mg/L
7439-92-1	LEAD	SW1311/6010D	5	0.10	mg/L
7439-97-6	MERCURY	SW1311/6010D	0.2	0.002	mg/L
7782-49-2	SELENIUM	SW1311/6010D	1	0.10	mg/L
7440-22-4	SILVER	SW1311/6010D	5	0.025	mg/L
GENERAL CHEMISTRY					
	CORROSIVITY	SW9045/SW9040	NS	N/A	pH Units
	IGNITABILITY/FLASHPOINT	SW1030/SW1010	<140	N/A	degrees F
	REACTIVITY	SW9012/SW9034	NS	5	mg/kg

NOTES:

(1) Actual laboratory reporting limit (RL) may vary. Laboratory RL or, at a minimum, the laboratory method detection limit (MDL) will meet the standard criteria.

NS No standard
N/A Not applicable
mg/L Milligrams per liter
ppb Parts per billion
mg/kg Milligrams per kilogram

TABLE 4.1 SAMPLE CONTAINERIZATION, PRESERVATION, AND HOLDING TIMES

Analysis	Bottle Type	Preservation	Holding Time [(a)]
TCLP VOCs	4 oz soil jar	Cool to 4°C	14 days extraction 14 days analysis
SVOCs +1,4-dioxane TCLP SVOCs TCLP Pesticides TCLP Herbicides	4 oz soil jar	Cool to 4°C	14 days extraction 40 days for analysis
PFAS	4 oz soil jar	Cool to 4°C	14 days for extraction, 40 days for analysis
Metals TCLP Metals	4 oz soil jar	Cool to 4°C	6 months 28 days (mercury)

(a) Days from sample collection.

TABLE 6.1 SUMMARY OF FIELD, LABORATORY, AND DATA MANAGEMENT RECORDS

REPORT	PERSON RESPONSIBLE FOR		STORAGE
	MAINTENANCE	DISTRIBUTION	
PROJECT FILES AND FIELD SAMPLING RECORDS			
Field Log	Field Team Leader	Project Manager	Job File at Primary Contractor's Location
Photographs	Field Team Leader	Project Manager	Job File at Primary Contractor's Location
Chain-of-Custody	Field Team Leader	Project Manager	Job File at Primary Contractor's Location
Field Sampling Records	Field Team Leader	Project Manager	Job File at Primary Contractor's Location
LABORATORY RECORDS			
Reagent and Titrant Preparation Records	Quality Assurance Manager	Laboratory Project Manager	Job File at Laboratory
Standards Preparation Logs	Quality Assurance Manager	Laboratory Project Manager	Job File at Laboratory
Sample Preparation Logs	Quality Assurance Manager	Laboratory Project Manager	Job File at Laboratory
Bench Data Sheets	Quality Assurance Manager	Laboratory Project Manager	Job File at Laboratory
Instrument Run Logs	Quality Assurance Manager	Laboratory Project Manager	Job File at Laboratory

TABLE 6.1 SUMMARY OF FIELD, LABORATORY, AND DATA MANAGEMENT RECORDS (CONT.)

REPORT	PERSON RESPONSIBLE FOR		STORAGE
	MAINTENANCE	DISTRIBUTION	
Strip Chart Recordings/ Chromatograms/Computer Output	Quality Assurance Manager	Laboratory Project Manager	Job File at Laboratory
Analytical Data Reports	Quality Assurance Manager	Laboratory Project Manager	Job File at Laboratory
Log-in Sheets	Quality Assurance Manager	Laboratory Project Manager	Job File at Laboratory
Maintenance Records	Quality Assurance Manager	Laboratory Project Manager	Instrument Maintenance Logbook at Laboratory
Periodic Calibration Records	Quality Assurance Manager	Laboratory Project Manager	QA Files at Laboratory
Operational Calibration Records	Quality Assurance Manager	Laboratory Project Manager	Job File at Laboratory
Nonconformance Memos	Quality Assurance Manager	Laboratory Project Manager	Maintained in Database File at Laboratory
Corrective Action Request Forms	Quality Assurance Manager	Laboratory Project Manager	Client Correspondence Records at Laboratory
DATA VALIDATION AND AUDIT RECORDS			
Data Validation Reports	Quality Assurance Officer	Quality Assurance Officer	Job File at Primary Contractor's Location
Audit Reports	Quality Assurance Officer	Quality Assurance Officer	Job File at Primary Contractor's Location

TABLE 8.1 SUMMARY OF FIELD QC SAMPLE TYPES AND COLLECTION FREQUENCY

Field QC Sample Type	Sample Type	Collection Frequency
Rinse Blank	Soil	1:20 Samples
Field Duplicates	Soil	1:20 Samples
Extra Volume Sample (collected for MS/MSD)	Soil	1:20 Samples

TABLE 8.2 LABORATORY QUALITY CONTROL SAMPLE FREQUENCY

QC Sample	Frequency
Method/Prep Blank	1 per analytical batch of 1-20 samples, per preparation event
Laboratory Control Sample	1 per analytical batch of 1-20 samples, per preparation event
Surrogate	Spiked into all field and QC samples (Organic Analyses)
Matrix Spike/Matrix Spike Duplicate or Matrix (Laboratory) Duplicate	1 per batch of 1-20 samples

TABLE 8.3 OPERATIONAL CALIBRATION FORMULAS

Application	Formula	Symbols
Linear calibration curves	$C = (R - a_0)/a_1$	C = analytical concentration R = instrument response a_0 = intercept of regression curve (instrument response when concentration is zero) a_1 = slope of regression curve (change in response per change in concentration)
Calibration factors [1]	$CF = A_x / C$	C = concentration (µg/L) CF = calibration factor A_x = peak size of target compound in sample extract
Response factors [2]	$RRF = C_{is} A_x / C_x A_{is}$	C = concentration (µg/L) RF = internal standard response factor C_{is} = concentration of the internal standard (µg/L) A_x = area of the characteristic ion for the target compound A_{is} = area of the characteristic ion for the internal standard

1. Used for quantitation by the external standard technique
2. Used for quantitation by the internal standard technique

Note: For organic analysis, the laboratory will make efforts to use the best curve technique for each analyte. This practice is described in detail in the laboratory calibration criteria documents for GC analysis. This may require the use of a quadratic curve for some compounds.

TABLE 8.4 PERIODIC CALIBRATION REQUIREMENTS

Instrument	Calibration Frequency		Corrective Actions
Analytical Balances	Daily: Annually:	Sensitivity (with a Class S-verified weight) Calibrated by outside vendor against certified Class S weights	Adjust sensitivity Service balance
Thermometers	Annually:	Calibrated against certified NIST thermometers	Tag and remove from service
Automatic Pipettors	Quarterly:	Gravimetric check	Service or replacement

TABLE 8.5 SAMPLE CONCENTRATION CALCULATION FORMULAS

Application	Formula	Symbols
Linear regression calibration curves	$C = (R - a_0)/a_1$	C = analytical concentration R = instrument response a_0 = intercept of regression curve (instrument response when concentration is zero) a_1 = slope of regression curve (change in response per change in concentration)
Calibration factors [1]	$C = A_x V_f / CF V_i$	C = concentration (µg/L) CF = calibration factor A_x = peak size of target compound in sample extract V_f = final volume of extracted sample (mL) V_i = initial volume of sample extracted (mL)
Response factors [2]	$C = C_{is} A_x V_f / RF A_{is} V_I$	C = concentration (µg/L) RF = internal standard response factor C_{is} = concentration of the internal standard (µg/L) A_x = area of the characteristic ion for the target compound V_f = final volume of extracted sample (mL) A_{is} = area of the characteristic ion for the internal standard V_i = initial volume of sample extracted (mL)
Residues [3]	$R = (W - T)/V \times 1{,}000{,}000$	R[6] = residue concentration (mg/L) W = weight of dried residue + container (g) T = tare weight of container (g) V = volume of sample used (mL)
Solid samples [4]	$K = C V D / W (\%S/100)$	K = dry-weight concentration (mg/kg) C = analytical concentration (mg/L) V = final volume (mL) of processed sample solution D = dilution factor W = wet weight (g) of as-received sample taken for analysis %S = percent solids of as-received sample

1. Used for quantitation by the external standard technique
2. Used for quantitation by the internal standard technique
3. Used for total, filterable, nonfilterable, and volatile residues as well as gravimetric oil and grease
4. Used to calculate the dry-weight concentration of a solid sample from the analytical concentration of the processed sample.
5. Conversion factor to convert g/mL to mg/L:

$$\frac{mg}{L} = \frac{g}{mL} \times \frac{10^3 mL}{L} \times \frac{10^3 mg}{g}$$

FIGURES

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Figure 2.1 Organization Chart
Corning Area Wide Study Project Team

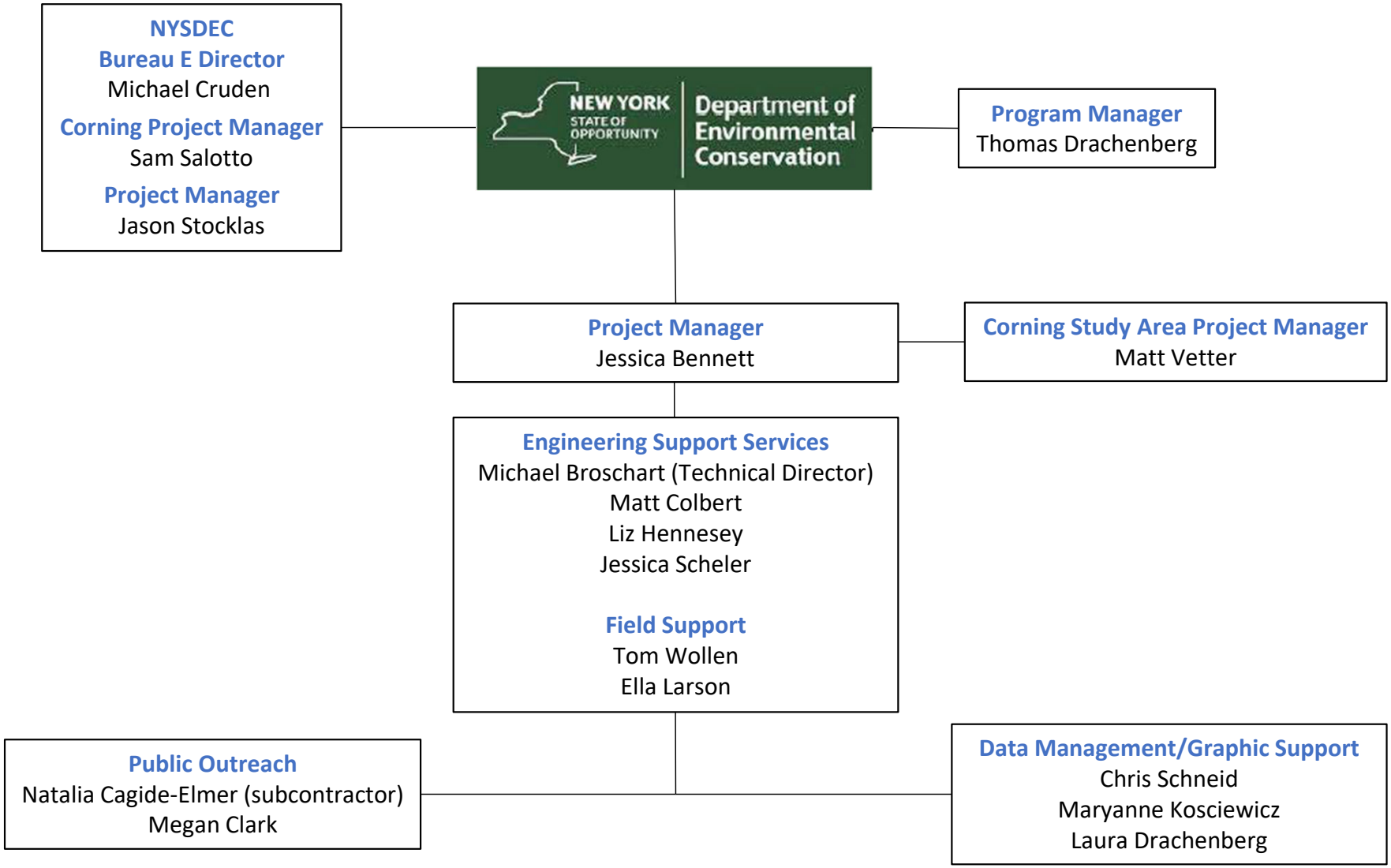

FIGURE 4.1 SAMPLE CUSTODY FLOW CHART

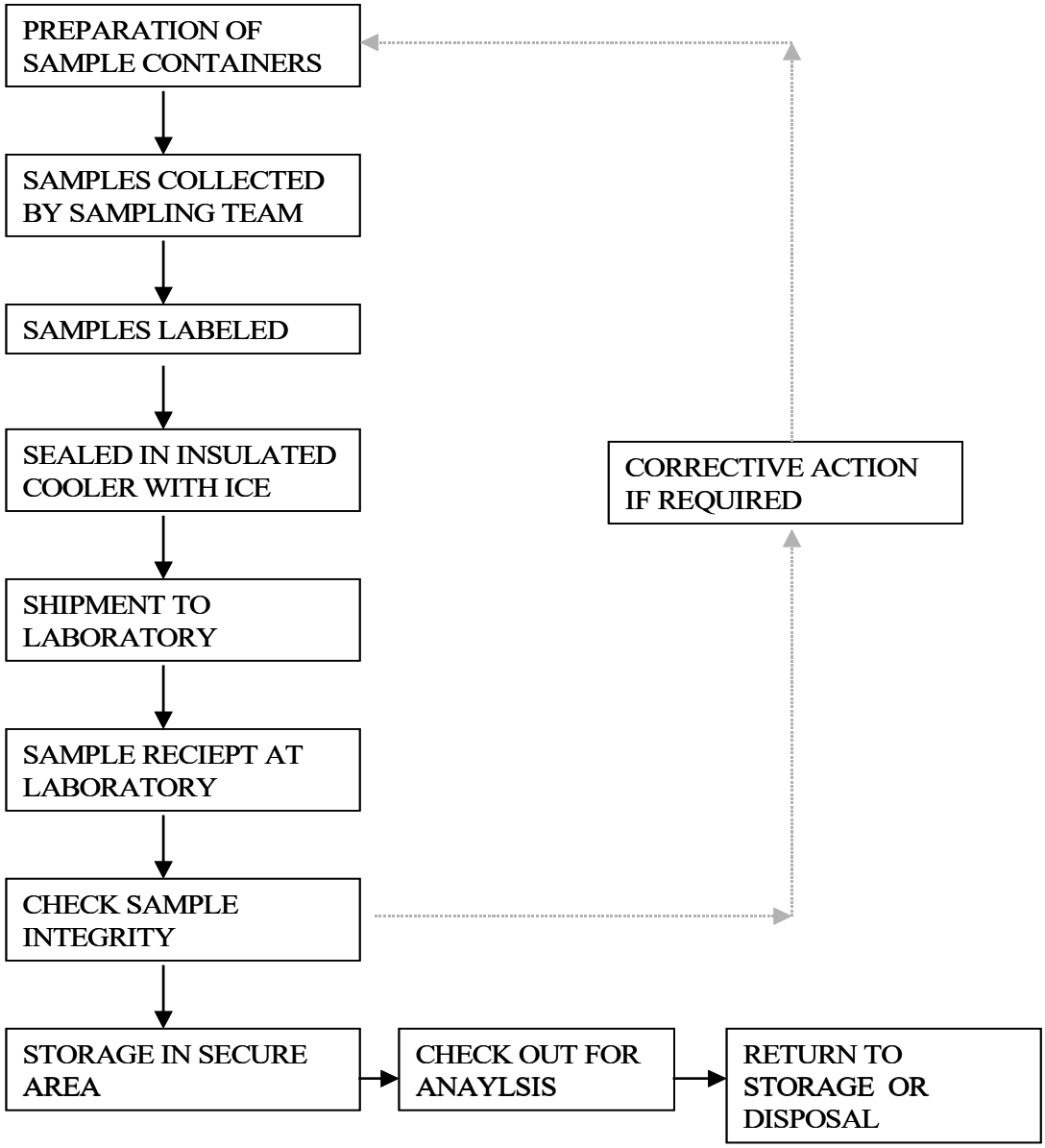

FIGURE 4.2 EXAMPLE CHAIN-OF-CUSTODY RECORD

Submitted to:

Chain Of Custody / Analysis Request

AESI Ref:
COC #:
Lab Use Only
Lab Proj #
Lab ID

Privileged & Confidential
EDD To:
Site Name:
Location of Site:

Client Contact: (name, co., address)
Sampler:
P O #
Analysis Turnaround Time:
Standard - Y
2 weeks -
1 week -
Next Day -
Hardcopy Report To:
Invoice To:

Preservative: 0 | 0 | 2
Job No.
Column Study Sediment

	Sample Identification: Location ID	Start Depth (ft)	End Depth (ft)	Field Sample ID	Sample Date	Sample Time	Sample Type	Sample Matrix	Sample Purpose	# of Cont.	Grab/Composite	Field Filtered Sample ?	Units
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													

Special Instructions:

Notes:

Relinquished by	Company		Received by	Company		Condition		Custody Seals Intact	
	Date/Time			Date/Time		Cooler Temp.			
Relinquished by	Company		Received by	Company		Condition		Custody Seals Intact	
	Date/Time			Date/Time		Cooler Temp.			

Preservatives: 0 = None; [1 = HCL]; [2 = HNO3]; [3 = H2SO4]; [4 = NaOH]; [5 = Zn. Acetate]; [6 = MeOH]; [7 = NaHSO4]; 8 = Other (specify):

FIGURE 10.1 CORRECTIVE ACTION REQUEST

CORRECTIVE ACTION REQUEST

Number _____ Date:_____

TO: _____

You are hereby requested to take corrective actions indicated below and as otherwise determined by you (a) to resolve the noted conditions and (b) to prevent it from recurring. Your written response is to be returned to the Project quality assurance manager by _____.

Condition:

Reference Documents:

_____ _____ _____ ____ ____ _____

Originator Date Approval Date Approval Date

Response

Cause of Condition:

Corrective Action

(A) Resolution:

(B) Prevention

(B2) Affected Documents

Signature_____ Date_____

CA Follow-up

Corrective Action verified by:_____ Date _____

ATTACHMENT A SUMMARY OF ANALYTICAL DATA PACKAGE (DQO LEVEL IV)

1.0 INTRODUCTION

In order for data to be used for decision-making purposes it is essential that it be of known and documented quality. Verification and validation of data requires that appropriate quality assurance and quality control (QA/QC) procedures be followed, and that adequate documentation be included for all data generated both in the laboratory and in the field.

The QA/QC documentation provided by any laboratory, in conjunction with sample results, allows for evaluation of the following indicators of data quality:

- Integrity and stability of samples;
- Instrument performance during sample analysis;
- Possibility of sample contamination;
- Identification and quantitation of analytes;
- Analytical precision; and
- Analytical accuracy.

General laboratory documentation requirements discussed in this document are formatted into two sections, organic and inorganic analyses. These specifications are intended to establish general, analytical documentation requirements that laboratories should meet when generating data for this project.

2.0 GENERAL DOCUMENTATION REQUIREMENTS

2.1 Data Package Format

Each data package for Level IV data submitted will consist of five sections:

- Case narrative;
- Chain-of-custody (COC) documentation
- Summary of results for environmental samples;
- Summary of QA/QC results; and
- Raw data.

Level II data packages will not contain the raw data.

Data packages will be consistent with, and will supply the data and documentation required for NYSDEC ASP-defined deliverables (i.e. Category B and Category A). Summaries of data and results may be presented in a Contract Laboratory Program (CLP) type format or an equivalent format that supplies the required information as stated below. All laboratory data qualifiers shall be defined in the deliverable.

In cases where the laboratory has varied from established methodologies, they will be required to provide the Standard Operating Procedures (SOPs) for those methods and added as an attachment to the Work Assignment Scoping Documents or as variances to this QAPP. Inclusion of these SOPs will aid in final review of the data by data reviewers and users.

2.2 Case Narrative

The case narrative will be written on laboratory letterhead and the release of data will be authorized by the laboratory manager or their designee. The Case Narrative will consist of the following information:

- Client's sample identification and the corresponding laboratory identification;
- Parameters analyzed for each sample and the methodology used. USEPA method numbers should be cited when applicable;
- Whether the holding times were met or exceeded;
- Detailed description of all analytical and/or sample receipt problems encountered;
- Discussion of reasons for any QA/QC sample result exceedances; and
- Observations regarding any occurrences which may adversely impact sample integrity or data quality.

2.3 Chain-of-Custody

Legible copies of all COC forms for each sample shall be submitted in the data package. Copies of any internal laboratory tracking documents should also be included. It is anticipated that COC forms and/or internal laboratory tracking documents will include the following information:

- Date and time of sampling and shipping;
- Sampler and shipper names and signatures;
- Type of sample (grab or composite);
- Analyses requested;
- Project, site, and sampling station names;
- Date and time of sample receipt;
- Laboratory sample receiver name and signature;
- Observed sample condition at time of receipt;
- Sample and/or cooler temperatures at time of receipt;
- Air bill numbers;
- Custody seal; and
- Sample numbers.

3.0 ORGANIC ANALYSES DOCUMENTATION REQUIREMENTS

These requirements are applicable to organic methods (e.g., VOCs, SVOCs, pesticides).

3.1 Summary of Environmental Sample Results

The following information is to be included in the summary of sample results for each environmental sample.

- Client's sample identifications and corresponding laboratory identifications;
- Sample collection dates;
- Dates and times of sample extraction and/or analysis;
- Weights or volumes of sample used for extraction and/or analysis;
- Identification of instruments used for analysis;
- Gas Chromatography (GC) column and detector specifications;

- Dilution or concentration factor for the sample;
- Percent Difference between columns, if applicable;
- Percent Moisture or Percent Solids for soil samples;
- Method Detection Limits (MDLs) or sample Reporting Limits (RLs);
- Analytical results and associated units;
- Discussion of any manual integrations; and
- Definitions for any laboratory data qualifiers used.

3.2 Summary of QA/QC Sample Results (as applicable)

The following QA/QC sample results shall be presented on QC summary forms. They shall also include the date and time of analysis. Additional summary forms may be required for some methods. Therefore, when reporting data, laboratories should defer to specific method requirements.

All summary forms should, at a minimum, include in the header:

- Form Title;
- Project Identifier (e.g., Batch QC ID, Site Name, Case Number, Sample Delivery Group);
- Laboratory Name; and
- Sample Matrix.

3.2.1 Instrument Calibration (for each instrument used)

- **GC/MS Tuning**. Report mass listings, ion abundance criteria, and percent relative abundances. List the instrument identification (ID) and the date and time of analysis. Ensure that all ion abundances have been appropriately normalized.
- **Initial Calibration**. Report analyte concentrations of initial calibration standards and the date and time of analysis. List the instrument identification (ID), response factors (RF), relative response factors (RRF), or calibration factors (CF), percent relative standard deviation (%RSD), and retention time (RT) for each analyte. The initial calibration (IC) report must also include a sample identifier (ID), associated injection volume or quantity of sample analyzed, the acceptance criteria, such as minimum RF values, and associated maximum %RSD values.
- **Continuing Calibration**. Report the concentration of the calibration standard used for the continuing calibration and for the mid-level standard, and the date and time of analysis. List the ID, RF, RRF, CF, percent difference (%D), and RT for each analyte.
- **Quantitation Limit** or Project Required Reporting Limit (PRRL) Verification (if applicable). Report results for standards that are used to verify instrument sensitivity. Report the source for the verification standards. Report the concentration for the true value, the concentration found, the percent recovery, and control limits for each analyte analyzed. The date and time of analysis must also be reported.

3.2.2 Method Blank Analysis

List environmental samples and QC analyses associated with each method blank. Report concentrations of any analytes found in method blanks above the instrument detection limit (IDL).

3.2.3 Surrogate Standard Recovery

Report the name and concentration of each surrogate compound added. List percent recoveries of all surrogates in the samples, method blanks, matrix spike/matrix spike duplicates and other QC analyses. Also include acceptance ranges that the laboratory used for the analysis.

3.2.4 Internal Standard Summary

Report internal standard area counts of the associated calibration standard and retention times, include upper and lower acceptance limits. List internal standard area counts and retention times for all samples, method blanks, matrix spike/matrix spike duplicates and other QC analyses. Include the ID and the date and time of analysis.

3.2.5 Compound Confirmation

Report retention times of each compound on both columns as well as retention time windows of the associated standard. In addition, report determined concentrations from each column and percent differences between results. List the ID and the date and time of analysis. A summary should be generated for each sample, including dilutions and reanalyses, blanks, MSs, and MSDs.

3.2.6 Peak Resolution Summary

For primary and secondary columns report retention times of any target compounds and/or surrogates that coelute in the standards (i.e. the Performance Evaluation Mixture for Contract Laboratory Program pesticides). Calculate and report the percent resolution between each pair of compounds which coelute. Include the ID, column ID, and the date and time of analysis.

3.2.7 Matrix Spike/Matrix Spike Duplicate (MS/MSD) Analysis

Report the name and concentration of each spiking compound. Samples are to be spiked with specified compounds of potential concern. List sample results, spiked sample results, duplicate spiked sample results, percent recovery (%R) and the relative percent difference (RPD) between the MS and MSD (if applicable). Acceptance criteria that the laboratory used for the analysis must also be presented.

3.2.8 Laboratory Duplicate Analysis

When performed, report the RPD between duplicate analyses, along with the associated acceptance criteria.

3.2.9 Laboratory QC Check Sample Analysis

Also known as the Laboratory Control Sample (LCS) or Matrix Spike Blank (MSB). Report the name and concentration of each spiking compound. List the QC check sample and duplicate (if applicable) results, %R, and RPD, if performed in duplicate. The acceptance criteria that the laboratory used for the analysis must also be presented.

3.2.10 Other QC Criteria

- **Retention time windows determination**. Report the retention time window for each analyte, for both primary and confirmation analyses.
- **Compound identification**. Report retention times and concentrations of each analyte detected in samples.
- **MDL determination**. List most recent MDLs, with dates determined maintained in laboratory file. MDL summary forms may be submitted at start of project and not included in individual data packages.
- **Additional method suggested QC parameters, if required**.
- **Any Performance Evaluation (PE) samples** (if identified) associated with the environmental samples.

3.3 Raw Data

Legible copies of the raw data shall be organized systematically, each page shall be numbered, and a table of contents must be included with each package. Raw data for compound identification and quantitation must be sufficient to verify each result.

3.3.1 Gas Chromatographic (GC) Analyses

This section shall include legible copies of raw data for the following:

- Environmental samples arranged in sequential order by laboratory sample number, include dilutions and reanalyses;
- Instrument calibrations; and
- QC analyses (i.e., method blanks, LCS, etc.).

Raw data for both primary and confirmation analyses are to be included. Raw data for each analysis shall include the following:

- Appropriately scaled chromatograms (label all analyte peaks, internal standards and surrogate standards with chemical names). All chromatograms shall be scaled such that individual peaks can be readily resolved from any neighboring peaks;
- Appropriately scaled before and after manual integrations;
- Area print-outs or quantitation reports;
- Instrument analysis logs for each instrument used;
- Sample extraction and cleanup logs;
- Standards preparation logs and manufacturer certificates of analyses for standards, if applicable, sufficient to document traceability of all standards (including surrogates, internal standards, and spike solutions) maintained in "job file" in laboratory, unless otherwise requested;
- Percent Moisture or Percent Solids for soil samples; and
- GC/MS confirmation, as applicable.

Note: Additional raw data may be required for some methods. Therefore, when reporting data, laboratories should defer to specific method requirements.

3.3.2 Gas Chromatographic / Mass Spectrometric (GC/MS) Analyses

This section shall include legible copies of raw data for the following:

- Environmental samples arranged in sequential order by laboratory sample number, include dilutions and reanalyses;
- Mass spectrometer tuning and mass calibration (BFB, DFTPP);
- Initial and continuing instrument calibrations; and
- QC analyses (i.e., method blanks, LCS, etc.).

Raw data for each analysis shall include the following:

- Appropriately scaled chromatograms (label all analyte peaks, internal standards and surrogate standards with chemical names). All chromatograms shall be scaled such that individual peaks can be readily resolved from any neighboring peaks;
- Appropriately scaled before and after manual integrations;
- Ion scans and enhanced spectra of target analytes and tentatively identified compounds (TICs), with the associated best-match spectra;
- Area print-outs and quantitation reports;

- Instrument analysis logs for each instrument used;
- Sample extraction and cleanup logs;
- Standards preparation logs and manufacturer certificates of analyses for standards, if applicable, sufficient to document traceability of all standards (including surrogates, internal standards, and spike solutions) maintained in "job file" in laboratory, unless otherwise requested; and
- Moisture Content (Percent Moisture) for sediment samples.

Note: Additional raw data may be required for some methods. Therefore, when reporting data, laboratories should defer to specific method requirements.

4.0 INORGANIC ANALYSES DOCUMENTATION REQUIREMENTS

4.1 Summary of Environmental Sample Results

The following information is to be included in the summary of sample results for each environmental sample:

- Client's sample identifications and corresponding laboratory identifications;
- Sample collection dates;
- Dates and times of sample digestion and/or analysis;
- Weights or volumes of sample used for digestion and/or analysis;
- Identification of instruments and analytical techniques used for analysis;
- Instrument specifications;
- Dilution or concentration factor for the sample;
- Percent Moisture or Percent Solids for soil samples;
- Detection Limits: MDLs, RLs;
- Analytical results and associated units; and
- Definitions for any laboratory data qualifiers used.

4.2 Summary of QA/QC Results

The following QA/QC sample results shall be presented on QC summary forms. They shall also include the date and time of analysis. Additional summary forms may be required for some methods. Therefore, when reporting data, laboratories should defer to specific method requirements.

All summary forms shall, at a minimum, include in the header:

- Form Title;
- Project Identifier (e.g., Batch QC ID, Site Name, Case Number, Sample Delivery Group);
- Laboratory Name; and
- Sample Matrix.

4.2.1 Instrument Calibration Verification (if applicable)

The order for reporting of calibration verifications for each analyte must follow the chronological order in which the standards were analyzed.

- **Initial Calibration Verification (ICV).** Report the source for the calibration verification standards. Report the concentration for the true value, the concentration found, the percent recovery, and control limits for each element analyzed. The date and time of analysis must also be reported.
- **Continuing Calibration Verification (CCV)**. Report the source for calibration verification standards. Report the concentration for the true value, the concentration found, the percent recovery, and control limits for each element analyzed. The date and time of analysis must also be reported.
- **Quantitation Limit** or PRRL Verification (if applicable). Report results for standards that are used to verify instrument sensitivity. Report the source for the verification standards. Report the concentration for the true value, the concentration found, the percent recovery, and control limits for each element analyzed. The date and time of analysis must also be reported.

4.2.2 Blank Analysis

Report analyte concentrations above the IDLs found in the initial calibration blanks (ICBs), continuing calibration blanks (CCBs), and in method/ preparation blanks. The date and time of analysis must also be reported. The order for reporting ICB and CCB results for each analyte must follow the chronological order in which the blanks were analyzed.

4.2.3 Matrix Spike (MS) Analysis

Report concentrations of the unspiked sample result, the spiked sample result and the concentration of the spiking solution added to the pre-digestion spike for each analyte. Calculate and report the %R and list control limits. If performed in duplicate, provide the %R for the MSD and the RPD.

4.2.4 Post Digestion Spike Analysis (if applicable)

In addition to matrix spikes, post-digestion spikes are often required by the method. Report concentrations of the unspiked sample results, spiked sample results, and the concentration of the spiking solution added. Calculate and report the %R and list control limits.

4.2.5 Laboratory Duplicate Analysis

Report concentrations of original and duplicate sample results. Calculate and report the RPD and list control limits.

4.2.6 Laboratory Control Sample

Identify the source for the LCS. Report the found concentration of the laboratory control sample and the true concentration for all analytes. Calculate and report the %R and list control limits.

4.2.7 Other QC Criteria (if applicable)

- **Method of Standard Additions (MSA)**. This summary must be included if MSA analyses are performed. Report absorbance values with corresponding concentration values. Report the final analyte concentration and list the associated correlation coefficient and control limits.
- **ICP-AES Serial Dilution**. Report initial and serial dilution results, associated %D, and control limits.
- **ICP-AES Linear Dynamic Ranges.** For each instrument and wavelength used, report the date on which linear ranges were established, the integration time, and the upper limit concentration.

- **MDL Determination**. List most recent MDLs as determined using the September 2017 promulgation of the 40CFR136, with dates determined maintained in laboratory file. MDL summary forms may be submitted at start of project and not included in individual data packages.
- **Any Performance Evaluation (PE) Samples** (if identified) associated with the environmental samples.

4.3 Raw Data

Legible copies of the raw data shall be organized systematically, each page shall be numbered, and a table of contents must be included with each package. Data should be organized sequentially by method and analysis date. Raw data for compound identification and quantitation must be sufficient to verify each result.

4.3.1 Atomic Absorption (AA) and Atomic Emission (AE) Spectrometric Analyses

This section shall include legible copies of raw data for the following:

- Environmental sample results, include dilutions and reanalyses;
- Instrument calibrations; and
- QC analyses (i.e., method blanks, LCS, etc.).
- Measurement print-outs for all instruments used or copies of logbook pages for analyses that do not provide instrument print-outs;
- Absorbance units, emission intensities, or other measurements for all analyses;
- Sample preparation and digestion logs that include reagents used, standards referenced to standards preparation logs, volumes of reagents, digestion times, etc.;
- Instrument analysis logs for each instrument used or summary of sample analyses;
- Standards preparation logs and manufacturer certificates of analyses for standards, if applicable, sufficient to document traceability of all standards (including spike solutions) maintained in "job file" in laboratory, unless otherwise requested;
- Wavelengths used for the analyses; and
- Percent Moisture or Percent Solids for soil samples.

Note: Additional raw data may be required for some methods. Therefore, when reporting data, laboratories should defer to specific method requirements.

4.3.2 Titrimetric and Colorimetric Analyses

This section shall include legible copies of raw data for the following:

- Environmental sample results, include dilutions and reanalyses;
- Calibrations; and
- QC analyses (i.e., method blanks, LCS, etc.).

Raw data for each analysis shall include the following:

- Copies of logbook pages for analyses that do not provide instrument print-outs and calculations used to derive reported sample concentrations;
- Titrant volumes, titration end-points, absorbance units, or other measurements for all analyses;
- Sample preparation and digestion logs that include reagents used, standards referenced to standards preparation logs, volumes of reagents, digestion times, sample volumes, solution normalities, etc.;
- Standards preparation logs and manufacturer certificates of analyses for standards, if applicable, sufficient to document traceability of all standards (including spike solutions) maintained in "job file" in laboratory, unless otherwise requested; and
- Wavelengths used for the analyses.

Note: Additional raw data may be required for some methods. Therefore, when reporting data, laboratories should defer to specific method requirements.

4.3.3 Gravimetric Analyses

This section shall include legible copies of raw data for the following:

- Environmental sample results, include dilutions and reanalyses;
- Calibrations; and
- QC analyses (i.e., method blanks, LCS, etc.).

Raw data for each analysis shall include the following:

- Copies of logbook pages for analyses that do not provide instrument print-outs and calculations used to derive reported sample concentrations;
- Weights, sample volumes, or other measurements for all analyses;
- Sample preparation and digestion logs that include reagents used, standards referenced to standards preparation logs, volumes of reagents, drying times, drying temperatures, etc.; and
- Standards preparation logs and manufacturer certificates of analyses for standards, if applicable, sufficient to document traceability of all standards maintained in "job file" in laboratory, unless otherwise requested.

Note: Additional raw data may be required for some methods. Therefore, when reporting data, laboratories should defer to specific method requirements.

SUMMARY OF REQUIRED LABORATORY DELIVERABLES FOR
LEVEL IV DQO DATA PACKAGE (REQUIREMENTS WILL VARY BY METHOD)

Method Requirements	Laboratory Deliverables
Requirements for all methods:	
Parsons project identification number	Case narrative
Discussion of unusual circumstances or problems	Case narrative
Analytical method description and reference citation	Case narrative
Field sample identification	Signed COC forms and sample results form
Laboratory assigned sample number	Signed COC forms and sample results form
Sample matrix description	Signed COC forms and sample results form
Date of sample collection	Signed COC forms and sample results form
Date of sample receipt at laboratory	Signed COC forms
Analytical method description and reference citation	Signed COC forms and case narrative
Sample analysis results	USEPA CLP form or equivalent sample analysis results summary form (e.g., ASP Form I-VOA)
Dates of sample preparation and analysis (including first run and any subsequent runs)	Specific deliverable depends on type of analysis
Laboratory analytical QC batch info and sample analysis associations	Specific deliverable depends on type of analysis
Instrument analysis sequence log	Specific deliverable depends on type of analysis
Analytical holding times compliance	USEPA CLP form or equivalent holding time summary form
Method detection limit (MDL) determination	USEPA CLP form or equivalent MDL summary form
Method reporting limits (RLs) achieved	Specific deliverable depends on type of analysis (see below)
Dilution or concentration factors	Specific deliverable depends on type of analysis
Discussion of unusual circumstances or problems	Case narrative
Laboratory Control Sample (LCS) results	USEPA CLP form or equivalent LCS results summary form
"Raw" analytical data sufficient to recreate and check analysis results for all calibrations, QC sample results, and sample results	Sequentially numbered pages with tabulated index

REQUIRED LABORATORY DELIVERABLES (Continued)

Method Requirements	Laboratory Deliverables
Matrix spike / matrix spike duplicate	USEPA CLP form or equivalent MS/MSD summary form (e.g., NYSDEC ASP Form III-SV
Method blank analysis	USEPA CLP form or equivalent method blank summary form (e.g., NYSDEC ASP Form IV-SV)
GC/MS instrument performance check. Tuning and mass calibration (abundance) using 4-bromofluorobenzene (BFB) for method SW8260B and decafluoro-triphenyphosphine (DFTPP) for method SW8270C	USEPA CLP form or equivalent instrument tuning/performance check summary form
Internal Standard Area Counts and Retention Time, as applicable	USEPA CLP form or equivalent internal standard summary form (e.g., NYSDEC ASP Form VIII-SV)
GC/MS initial calibration data	USEPA CLP form or equivalent initial calibration summary form (e.g., NYSDEC ASP Form VI-SV)
GC/MS continuing calibration data.	USEPA CLP form or equivalent continuing calibration summary form (e.g., NYSDEC ASP Form VII-SV)
GC/MS calibration verification (initial and continuing)/2nd source calibration verification (ICV/CCV)	USEPA CLP form or equivalent calibration verification summary form
GC continuing calibration data for volatile and semivolatile analyses. If calibration factors are used, calibration factors and their percent differences from the initial calibration must be reported. Retention time windows and analyte retention times must be included in this form	USEPA CLP form or equivalent calibration verification summary form
GC/MS internal standard area and retention time summary data	USEPA CLP form or equivalent internal standard summary form
GC second column confirmation, as applicable. To be done for all compounds that are detected above method detection limits	Chromatograms of all confirmations of all samples and the standard laboratory form for all positive results
Surrogate Compound percent recovery summary	USEPA form or equipment percent recovery summary form (e.g., NYSDEC ASP Form II-SV)
"Raw" analytical data sufficient to recreate and check analysis results for all calibrations, QC sample results, and sample results	Sequentially numbered pages with tabulated index
Requirements for inorganic analytical methods:	
Initial and Continuing Calibration Verification	USEPA CLP form or equivalent calibration verification summary form(s) (e.g., NYSDEC ASP Form II-IN)

REQUIRED LABORATORY DELIVERABLES (Continued)

Method Requirements	Laboratory Deliverables
ICP Interference Check Sample (ICS), as applicable	USEPA CLP form or equivalent ICS standard summary form (e.g., NYSDEC ASP Form IV-IN)
ICP Interelement Correction Factors, as applicable	USEPA CLP form or equivalent internal standard summary form (e.g., NYSDEC ASP Form XII-IN
IDL or MDL determination	USEPA CLP form or equivalent IDL or MDL summary form(s)
Post-digestion spike, as applicable	USEPA CLP form or equivalent post-digestion spike summary form(s) (e.g., NYSDEC ASP Form V-IN)
ICP linear range	USEPA CLP form or equivalent linear range summary form(s) (e.g., NYSDEC ASP Form XII-IN)
ICP serial dilution, as applicable	USEPA CLP form or equivalent serial dilution summary form(s) (e.g., NYSDEC ASP Form IX-IN)
Method of standard addition (MSA), as applicable	USEPA CLP form or equivalent MSA summary form(s)
Laboratory duplicate results, as applicable	USEPA CLP form or equivalent duplicate analysis summary form(s) (e.g., NYSDEC ASP Form VI-IN)
Requirements for other methods:	
Preparation and analysis logs	No format
Sample results	No format
MS/MSD results	No format
Lab duplicate sample results	No format
Laboratory control sample	Control limits
Method blank results	No format
Initial calibration results	No format
Continuing calibration check (calibration verification)	No format. Report percent relative standard deviation or percent difference from initial calibration

ATTACHMENT 3 PARSONS SUBSURFACE SOIL DISTURBANCE PROTOCOL

PARSONS ENVIRONMENT & INFRASTRUCTURE GROUP
MANDATORY SUBSURFACE SOIL DISTURBANCE PROTOCOL

1. INTRODUCTION

Intrusive investigation or excavation of the subsurface in areas developed for commercial, industrial or residential use exposes Parsons to the risk of causing damage to underground utilities and structures on a daily basis.

The potential consequences of causing damage to an underground utility or structure include, but are not limited to the following:

- Injury or loss of life
- Financial responsibility for repair, lost time, and/or loss of service
- Loss of client
- Federal investigation of job site work practices
- Litigation (third party lawsuits)

The mandatory protocol and checklists provided herein are intended as tools to aid in the management of risk, and ensure that a responsible standard is consistently applied at project sites where intrusion of the subsurface will occur.

2. PURPOSE

The purpose of this mandatory protocol is the prevention of potential injury and/or loss of life; and damage to subsurface utilities and structures. Parsons' staff will identify and evaluate the hazards associated with underground utilities and other structures prior to conducting any intrusive subsurface operation including but not limited to drilling/boring, test pitting, excavation and other subsurface intrusive activities.

3. SCOPE

Parsons' staff will employ sound investigative and work practices, and will use appropriate measures to avoid damage to subsurface utilities and structures. Furthermore, Parsons requires that these procedures be implemented by all of Parsons' employees and subcontractors, as appropriate. Subcontractors will have a copy of the procedures set forth in Section 6 of this document as an appendix to their contracts.

4. POLICY

Parsons' policy requires that the project manager follow all local, state, and federal laws applying to intrusive subsurface work (i.e. obtain permits, inform agencies, obtain utility clearances, etc). The project manager shall review, as available, all current and historical site drawings and plans from the client, facility owner or tenant, utility providers, municipal government offices (i.e. city engineer or building department) and third parties as appropriate.

The Pre-Drilling/Subsurface Checklist for Intrusive Fieldwork **(Attachment A)** shall be completed prior to initiating fieldwork. Note: *The checklist includes a site visit as a requisite to meet with knowledgeable staff as appropriate (current or former site/owner personnel, utility representatives, municipal representatives, etc.), and review site conditions and features relative to the proposed locations for intrusive work. The checklist should be turned in to the Parsons Project Manager and a copy placed in the project file.*

The procedure described under Section 6 of this document is mandatory at all sites where any intrusive subsurface activities will take place, including but not limited to drilling, augering, boring, excavating, test pitting, trenching or direct push (Geoprobe) technology.

Variance from the Subsurface Soil Disturbance Protocol is allowed only with the written approval from the appropriate Parsons' Program Manager or Sector Leader and the completion of the Utility Clearance Variance Request Form (Attachment B). GBU, Division or Project Safety personnel should be consulted as needed. Failure to obtain a variance in writing is grounds for disciplinary action. Copies of all variances will be maintained in the project files.

The Project Manager is encouraged to find locations that are acceptable to the project team to perform intrusive subsurface work that are not within right-of-ways, streets, highways, or near municipal or third party-owned utility corridors. When it is necessary to conduct work within these areas, the Project Manager should obtain approval from either the Program Manager or Sector Leader and submit the existing work plan to the GBU or Division Safety Manager for review.

5. RESPONSIBILITY

It is the responsibility of the Project Manager to ensure that the Pre-Drilling/Subsurface Checklist for Intrusive Fieldwork and Utility Clearance Variance Request form are followed. If a variance is sought, it is the responsibility of the Project manager to gain written approval of the appropriate Parsons' Program Manager or Sector Leader.

6. PROCEDURE: SUBSURFACE SOIL DISTURBANCE PROTOCOL

The Parsons' Project Manager will be responsible for fulfilling the objectives of this protocol by ensuring that the procedures are carried out by Parsons' employees, subcontractors, and any other person acting on behalf of Parsons. The Parsons' Project Manager will ensure that all individuals working on drilling and other subsurface exploration projects are adequately trained and supervised. Parsons will practice sound investigation and work practices and employ

all necessary measures to avoid damage to subsurface systems and structures. The Parsons' Program Manager or Sector Leader will be contacted and advised in advance of beginning field work in the event that a variance to this protocol is requested by the Parsons' Project Manager or designee. The following tasks/subtasks will be completed at every site and documented on the checklist.

6.1 PRE-INVESTIGATION TASKS

The objective of these tasks is to gather all relevant information about the site to assist in identifying exploration locations and obtaining necessary permits. Please note that in some instances the following information will be obtained or gathered by a subcontractor, which meets this objective.

6.1.1 Obtain Site Plans

Obtain as-built drawings and/or existing site plans as available. NOTE: As-built drawings may not accurately depict the locations of improvements and subsurface features and should therefore not be solely relied upon to determine acceptable locations for intrusive subsurface activities.

6.1.2 Obtain Permits

The project staff will observe all local, state, and federal laws, obtain all necessary permits and utility clearances, and secure site access permission. NOTE: Some permits/clearances require this step to be completed after the exploration locations have been identified and marked in the field. If this is required, proceed with Items 6.2 and 6.3 prior to obtaining permits.

6.1.3 Utility Mark-outs

Parsons' project staff will request a utility mark-out through the local utility locating one-call system for the work site, and document a reasonable degree of effort to locate all main electrical, gas, telephone and all other subsurface utilities. The Parsons' Project Manager must be notified of the status of locating underground utilities before field work progresses. If locating utilities becomes problematic, the Parsons' Project Manager should update the client and discuss potential alternative methods for locating or reducing risk of damage to underground utilities/structures for consideration (i.e. subcontract a private locating service, re-evaluate risk/reward of specific locations or utilize intrusive non-destructive methods as described in Section 6.5.6). Site plans will be updated as appropriate to include utility mark-out information. On third party sites, close coordination with the site owner's representatives for mark-outs, review of as-builts, and other information reviews should be conducted prior to work. NOTE: Some utilities require the exploration locations to be identified and marked in the field prior to performing mark-outs. If this is required proceed with Items 6.2 and 6.3 prior to obtaining permits.

6.2 SITE VISIT

A site visit is required to compare the site plan to actual conditions, document all findings, and update the site plan. Parsons will obtain information needed to prepare a vicinity map of the area that may include significant neighboring addresses, land use, surface water bodies, and other natural as well as manmade features of note, as appropriate. The site visit should be scheduled concurrent with, or soon after the utility mark-out. The inspection should include the following activities at a minimum.

6.2.1 Utilities

Note the location of all utility mark-outs and aboveground utilities:

- Area lights
- Phones
- Drain lines
- Overhead lines
- Fire hydrants
- Fiber optic cable signage
- Catch basins
- Manholes
- Junction boxes
- Natural gas
- Other utilities
- Observe paving scars such as areas of new pavement or saw cuts

6.2.2 Plant/Property Systems

If possible, speak with someone having historical site knowledge to gain information about the site (locations of former tanks, lines, etc.). For UST systems:

- Inspect for the presence of a dispenser pan and, if possible, determine whether product piping is rigid or flexible.
- Visually inspect the location of the tank field, observation wells (if present), dispensers and vent stack(s).

- Note the orientation, arrangement, location, sizes, etc. of the tanks and manholes. Estimate the burial depth of the tank field.

- Observe paving scars (i.e. fresh asphalt/concrete patches, scored asphalt/concrete). Note that this may not indicate location of product piping.

6.2.3 Existing Remediation Systems

Visually inspect the location of aboveground components. Note the locations of well manholes, sparge points, etc.

6.2.4 Safety

For UST systems, note the location of the emergency shut off switch and become familiar with its use.

6.3 SELECTION OF DRILLING/TEST PIT LOCATIONS

6.3.1 Critical Zones

Establish pre-drilling critical zones appropriate to the project site. These are zones where no drilling (if possible and if client concurs) will be conducted. As an example, the following critical zones could be applied at a UST site:

- 10ft (3m) distance from the furthest edge of any operating tank

- 10ft (3m) distance surrounding operating dispenser islands

- At active service station sites, the entire area between the tank field and the dispenser islands.

- The zone between 0 and 5-feet of utility markings

6.3.2 Select Drilling Locations

The information collected to this point will be utilized in combination with regulatory requirements and investigation objectives to select drilling locations. It is recommended that alternate drilling locations be selected in case additional explorations are required or obstructions are encountered. The effort to investigate a specific proposed drilling location should be to clear a minimum five-foot radius circle around the location.

6.3.3 Review Selected Locations with the Client

At a minimum, offer to review the selected and alternate drilling locations with the client's project manager or designated representative. When completing Geoprobe^{tm} (or similar) investigations in which some boring locations are not selected in advance, but partially

determined in the field based on field screening results, the client should approve the areas in which work will be performed. Do not proceed with the investigation until the plan has been discussed with the client, and approval to proceed has been granted. If relocation of a boring outside approved limits is necessary at any time and for any reason, contact the client prior to proceeding. CLIENT APPROVAL MUST BE DOCUMENTED. Verbal approval is acceptable if followed with written approval. Documentation may include a notation in the field book, email or written correspondence.

6.4. REQUIRED NOTIFICATIONS

Affected parties must be notified at least 48-hours (longer if possible) in advance of planned intrusive fieldwork. An exception would be in the event of an emergency response situation. Parsons' staff will avoid scheduling conflicts with facility activities at the site. The Parsons' Project Manager or designee will notify the following persons as applicable:

- The oversight regulatory agency (includes local fire, police and municipal contacts as appropriate).
- Property owner for private properties. This should include neighboring third party property owners if a potential exists for causing inconvenience as a result of the scheduled fieldwork.
- Client specific notifications as appropriate (i.e. facility maintenance, retail and/or real estate managers as appropriate)

6.5. ON-SITE SUBSURFACE ACTIVITIES

6.5.1 Safety

A Project Safety, Health and Environmental Plan (PSHEP) must be available on site at all times and all Parsons' staff, contractors and subcontractors must be familiar with it. Parsons' employees are to acknowledge their review of the PSHEP by signing the signature form contained within the PSHEP. The Parsons' field team leader is tasked with conducting a tailgate meeting at the start of each day to review project specific health and safety items with staff and subcontractors. Subcontractors, however, are responsible for their own health and safety. All work areas shall be secured with safety cones, safety tape, construction fence, barricades, or signs as appropriate.

A copy of this entire subsurface activity protocol and completed checklist must be appended to the health and safety plan.

6.5.2 Supervision

A Parsons' on-site representative will be responsible for overseeing subsurface activities. This representative will ensure that the work is performed with due caution and will be alert for warning signs that could indicate the presence of underground tanks, lines, or other subsurface structures.

6.5.3 Warning Signs

The following warning signs may indicate the presence of a subsurface structure such as tanks or lines:

- Pea Gravel/Sand/Non-indigenous Material.
- The absence of soil recovery in the hand auger. This could indicate pea gravel that has spilled out of the auger.
- Any unexpected departure from the native soil or groundwater conditions as established in other on-site digging.
- Obstructions encountered

If any of the above warning signs or a suspicious condition is encountered, intrusive subsurface activities in this area should immediately cease and the Parsons' Project Manager shall be contacted.

6.5.4 Drill Boring Sequence

If possible, the boring sequence should be planned such that the boring furthest from any suspected underground improvements is carried out first. This is done to determine the natural subsurface conditions and to allow the field geologist/scientist to recognize native versus fill conditions. Also, least impacted locations should be done first if possible to prevent possible cross contamination.

6.5.5 Surface Removal for Paved Areas

Sufficient paving or surface improvement should be removed to allow clear visibility of the subsurface conditions during hand augering/digging, and allow excavation with hand tools. Drilling in an area of high risk may warrant a larger pavement opening.

- Monitoring Well Installations: 2-ft x 2-ft (60cm x 60cm) minimum removal is suggested (assumes for example: 6.25-inch hollow stem auger (HSA) or smaller).
- Soil Borings: 8-inch (20cm) diameter minimum removal is suggested (assumes for example: 3.25-inch HAS or smaller).
- Direct Push Samplers: 4 to 6 inch (10 to 15 cm) diameter minimum removal is suggested (assumes for example: 2-inch diameter sample tube).

The technique used should not pose a threat to subsurface structures. Final completion for holes in pavement shall be neatly saw-cut or cored unless otherwise directed by the client.

6.5.6 Clearing the Subsurface for Utilities and Other Structures

Parsons' staff must ensure that no subsurface utilities, structures, or improvements exist where intrusive subsurface activities will occur. Locations will be cleared using results of historical data research and with geophysical methods (see below for details) at a zone 5 feet in radius around the proposed location. Staff (or personnel supervised by Parsons) will also utilize intrusive, non-destructive procedures such as hand digging to a depth of 5 feet and a diameter or width equivalent to the outside dimensions of the auger to investigate the boring location.

The method used to delineate the subsurface should be compatible with the inherent risk associated with the type of facility/property and the location of the drilling. Proactive investigative methods to clear specific drilling locations will include the following non-invasive and invasive non-destructive methods:

Non-Invasive Geophysical Remote Sensing: Multiple appropriate instruments (ground penetrating radar, electromagnetic detector, magnetometer, metal detector) can be used for this work. Survey an area around the location to a distance of 5 feet using geophysical methods to identify potential subsurface utilities or facilities. Move the borehole location, if necessary, within the cleared circle to avoid an object identified by the geophysical instrument. Examples of geophysical methods are provided below:

- Electromagnetic and radio frequency;
- Ferrous metal or magnetic locators;
- Ground probing radar (GPR).

Important note: A combination of two or more non-invasive instruments may be required to properly clear a subsurface area. For example, a ferrous metal detector may not detect metals pipes embedded in concrete duct banks, PVC pipes, FRP pipes, or other non-ferrous materials.

Intrusive Non-Destructive Procedures: Delineate the subsurface at the borehole location by probing or digging. Several acceptable methods are discussed below. In some cases, these intrusive procedures may not be practical due to the subsurface conditions or requirements of the explorations.

- Vacuum/Air Knife Digging: Vacuum digging has proven to be a very effective and safe means of digging and is recommended instead of probing and digging with hand tools.
- Probing: The probe should have a blunt or rounded tip and should be advanced by hand in a triangular pattern around the bore location without excessive force.
- Hand Digging: Should be performed with a small hand garden spade.

- Hand Augering: The auger is to be turned slowly and not forced through the soil. It is recommended that an auger without sharp points (some augers have rounded edges) be used.

- Post Hole Digging: Can be used for soil removal only in soil that has been probed and cannot be used to advance the hole beyond the depth or width of probing.

The area to be cleared for underground utilities or structures for augering shall exceed the diameter of the largest tool (hand auger, drill auger, sampling tube, etc.) to be advanced and sufficiently large to allow for visual inspection of any obstructions encountered. The first 1 - 2ft (0.3 - 0.6m) can be cleared by hand digging to remove the soil. Slowly and carefully probe (i.e. triangular pattern), vacuum, or hand auger throughout the area to be cleared to ensure that no obstructions exist anywhere near the potential path of the drill auger or push type sampler. The soil in the area to be cleared shall be fully removed during this step. If probing is utilized, then alternate probing with soil removal as necessary, until the first 5-ft (1.5m) has been delineated.

6.5.7 Refusal

Where natural subsurface conditions (e.g. cobbles/rocks, fill material, and/or bedrock) may prevent adequate probing and augering, a practical and sensible evaluation by the Parsons' Project Manager will be the basis for determining if continuation of probing and augering is feasible. In all cases Parsons must employ all means necessary to prevent damaging subsurface utilities, product lines, tanks, or other structures. **When conventional means of probing and augering cannot be utilized, the Parsons' field representative believes that additional probing/augering is not feasible, or if the probing/augering poses additional hazard to personnel because of the physical demands of performing the task, work in that specific area will cease**. The Parsons' Project Manager will contact the client's project manager or designee to discuss alternatives. If Parsons' staff suspects, based on past information or boring logs, that hand augering is infeasible, then alternatives such as vacuum clearing or non-invasive procedures should be evaluated in advance.

6.5.8 Event Notification

If any portion of a tank, pipe, utility or other subsurface structure is encountered, or if there is any doubt it has been encountered, the work is to cease in that area and the Parsons' Project Manager notified immediately. If there is reason to believe that the structure has been damaged, if applicable, the emergency shut-off switch should be activated (if applicable) and the appropriate municipality and client notified immediately. The Parsons' Project Manager and/or client will decide if additional uncovering by hand is required. If it is confirmed that a UST system has been encountered, a tightness test(s) should be considered. Under no circumstances is the area to be backfilled without notifying the Parsons' Project Manager, unless risk of personal injury or damage warrants a temporary backfilling.

In case of refusal or if an unknown subsurface object is encountered during intrusive subsurface activities, then the following specified resolution process must take place.

- Additional and deliberately careful excavation by hand will be conducted in an attempt to define the cause of refusal or identify the subsurface object.

    a. If the cause CAN be readily and correctly defined as not destructive or hazardous, the field task manager should call the PM to discuss the situation.

    b. If the cause CAN be readily and correctly defined as potentially destructive or hazardous, the field task manager should call the PM to discuss the situation. The specific location must be re-evaluated.

    c. If the cause CANNOT be readily and correctly defined, the field task manager should call the PM to discuss the situation. The specific location must be re-evaluated.

- In case "a," drilling may proceed ONLY after consultation with the PM.

- In cases "b" and "c," drilling MUST STOP so that location re-evaluation can take place. The client, the utility owner (if applicable) and if required, the appropriate regulatory agency, must be advised of the situation and consulted to determine if (1) the location is necessary, which may require additional effort to clear a new location, or (2) the location is not necessary, and can be deleted from the program.

6.5.9 Scheduling

Since clearing locations for augering, drilling, excavation and similar intrusive field work can be time consuming, it may be appropriate to perform the surface removal subsurface delineation prior to the arrival of subcontractors and their equipment on site. If these activities are conducted prior to the actual day of intrusive field work, then the cleared locations must be adequately covered with plates and/or backfilled, or barricaded to protect pedestrians and other surface traffic. Care must be taken to prevent settlement of the material used to cover the holes.

ATTACHMENT A

PRE-DRILLING/SUBSURFACE CHECKLIST FOR INTRUSIVE FIELD WORK

PREDRILLING/SUBSURFACE CHECKLIST FOR INTRUSIVE FIELDWORK

Site Name: _____ **Job Number:** _____
Site Phone Number: _____
Site Address: _____ **County:** _____
Client Proj. Mgr.: _____ **Phone:** _____
Site Manager Contacted Date: _____ **By:** _____
Site Drawings (yes / no / NA) _____ (please attach) **Historical Drawings (yes / no / NA)** _____
Third Party Construction/Redevelopment Plans (Yes/No/NA)

***ATTACH SITE FIGURE WITH PROPOSED BORING LOCATIONS

Subcontractor's (drillers, concrete, etc…) **Company** _____
Subcontractor's Contact Person _____ **Phone** _____
Meeting / Start Date _____ **Time** _____

1) **Health and Safety Signoff Form Completed? (Yes/No)** **Date** _____

2) **Utility Protection Services (Minimum 48 Hrs. Advance Notice, State Specific Notification Period Supercedes)**
Called: Date _____ **Time** _____ **Initials** _____
Reference # _____
Proposed Drilling Locations Premarked for Locating Service. **Y / N**

3) **Private or In-House Utility Locating Service Performed?** **Y / N** _____
Called: Date _____ **Time** _____ **Initials** _____
Name of Locating Service: _____
Telephone #/ contact: _____
Name of Supplier Locating Technician: _____
Type of sensing equipment used: _____
Proposed Drilling Locations Premarked **Y / N**

4) **Other Potential Underground Structures**
Name of City Engineer/Utility Representative: _____
Telephone #: _____
Date Notified _____ **Maps:** **Y / N**
Cleared: **Y / N**

5) **COMPLETED SITE WALKOVER W/ SITE MANAGER/DESIGNEE OR OWNER/TENANT REP.** **Y / N**
Name of Site Manager: _____
Name of Property Owner/Tenant Representative: _____
Cleared: **Yes / No**
Building Utility Service Line Connections Identified: **Y / N**
(Hand sketch on site map w/proposed boring locations and most likely utility trench locations)

6) **Utility Inventory:** **Y / N**

Utility	Name	Depth (ft) (If Available)	Phone	Notified - Date	Marked
Above Ground Services					
Electric		NA		Y / N	Y / N
Telephone		NA		Y / N	Y / N
Cable		NA		Y / N	Y / N
Overhead Supports		NA		Y / N	Y / N
Traffic light cables		NA		Y / N	Y / N

PREDRILLING/SUBSURFACE CHECKLIST FOR INTRUSIVE FIELDWORK

6) Utility Inventory Continued:

Below Ground Services:

Electric				Y / N		Y / N
Telephone				Y / N		Y / N
Cable				Y / N		Y / N
Gas				Y / N		Y / N
Water				Y / N		Y / N
UST System				Y / N		Y / N
Storm				Y / N		Y / N
Sanitary				Y / N		Y / N
Steam				Y / N		Y / N
Pipeline Companies				Y / N		Y / N

Other:

				Y / N		Y / N
				Y / N		Y / N
				Y / N		Y / N

7) Site-Specific Emergency Contingency Plan Incorporated in Health & Safety Plan Y / N

8) Drilling Locations Approved by Client Project Manager Named Above? Y / N

9) Signature of Parsons' Project Mgr. (required to begin fieldwork):

Name of Project Manager	**Signature of Project Manager**
Name of Parsons Field Personnel	**Signature of Field Personnel**

(This document to be included with the site H&S Plan and should be available upon request.)

ADDITIONAL COMMENTS / NOTES:

ATTACHMENT B
UTILITY CLEARANCE VARIANCE REQUEST FORM

PARSONS

UTILITY CLEARANCE VARIANCE REQUEST

To: Enter Parsons Manager (Program, Sector or Operations)

From:

Client Company Name:

Site/Project Name:

Date of Request:

Work Start Date:

The purpose of this document is to request a variance from one or more of the PE&I Mandatory Subsurface Soil Disturbance Protocol requirements. The purpose of the mandatory protocol is to prevent potential injury and/or loss of life; and damage to subsurface utilities and structures during any soil disturbance. Any waiver of these requirements should be carefully evaluated.

Variance from the Subsurface Soil Disturbance Protocol is allowed only with the written approval of the appropriate Parsons' Program/Sector/Operations Manager. GBU/Divisional/Program safety resources should be consulted as needed. Failure to obtain a variance in writing is grounds for disciplinary action.

Brief Project Description

Insert a brief background and description of the intrusive activities, which are the reason(s) for requesting a variance.

Utility Clearance Requirements

Step No.	Requirement	Step Completed[1]
Prep-1	Obtain as-built drawings and/or existing site plans if available and review for on-site utilities.	☐ Yes ☐ No

[1]Any "No" response must include the rationale for not completing the step at the end of the Variance Request form.

Step No.	Requirement	Step Completed[1]
Prep-2	Utility mark-out requested through the nationwide utility locating one-call system (www.call811.com) for the work site.	☐ Yes ☐ No
Prep-3	Review the Subsurface Soil Disturbance protocol with all PE&I technical staff that will potentially be involved in projects that include subsurface investigation.	☐ Yes ☐ No
Pre Mob-1	Notify affected parties at least 48-hours (longer if possible) in advance of planned intrusive fieldwork.	☐ Yes ☐ No
Pre Mob-2	Prepare a Project Safety, Health and Environmental Plan (PSHEP) that includes a copy of the Subsurface Soil Disturbance protocol.	☐ Yes ☐ No
Pre Mob-3	Select a competent Parsons' on-site representative to oversee all surface removal, hand augering/digging, drilling, and test pitting.	☐ Yes ☐ No
Site [2] Visit-1	Perform a site visit and identify indications of underground utilities. Indications could include [3]: ➢ Area lights ➢ Phones ➢ Drain lines ➢ Overhead lines ➢ Fire hydrants ➢ Fiber optic cable signage ➢ Catch basins ➢ Manholes ➢ Junction boxes ➢ Natural gas	☐ Yes ☐ No

[1] Any "No" response must include the rationale for not completing the step at the end of the Variance Request form.

[2] Site visit activities must be included with mobilization activities if a Site visit is not performed prior to mobilization for the field work.

[3] Note that list is not all inclusive.

Step No.	Requirement	Step Completed[1]
	➢ Observe paving scars such as areas of new pavement or saw cuts	
Site Visit-2	Prepare a vicinity map of the proposed work area to include significant features and utilities. The site visit should be scheduled concurrent with, or soon after the utility mark-out.	☐ Yes ☐ No
Site Visit-3	Interview someone having historical site knowledge to gain information about the site (locations of former tanks, lines, etc.).	☐ Yes ☐ No
Site Visit-4	Establish pre-drilling critical zones appropriate to the project site	☐ Yes ☐ No
Site Visit-4	Review Selected Locations with the Client	☐ Yes ☐ No
Field Work-1	Review site utility maps against each proposed work activity. Check for legibility, accuracy, and scale while walking areas of concern. Evaluate the work area for any items in Site Visit-1 that may have been missed.	☐ Yes ☐ No
Field Work-2	Obtain all necessary permits and utility from the facility.	☐ Yes ☐ No
Field Work-3	Remove any surface paving or surface cover allow clear visibility of the subsurface conditions during hand augering/digging, and allow excavation with hand tools.	☐ Yes ☐ No
Field Work-4	Non-Invasive Clearing: Clear a minimum of a five foot radius for each proposed intrusive activity. Locations will be cleared using results of historical data research and with geophysical methods. Multiple appropriate instruments (ground penetrating radar, electromagnetic detector, magnetometer, metal detector) can be used for this work.	☐ Yes ☐ No
Field Work-5	Invasive Clearing: Delineate the subsurface at the borehole location by probing or digging. Dimensions of the intrusive method must exceed the diameter of the largest tool (hand auger, drill auger, sampling tube, etc.) to be advanced and	☐ Yes ☐ No

Step No.	Requirement	Step Completed[1]
	sufficiently large to allow for visual inspection of any obstructions encountered. Approved methods could include the following: ➢ Vacuum Extraction (Air Knifing, SoftDig®) ➢ Probing ➢ Hand Digging ➢ Hand Augering ➢ Post Hole Digging	

Rationale

Below, identify the step or steps the variance is being requested for and an explanation of why the waiver is necessary and/or justified.

Step No.	Rationale for Variance Request

Approvals

	Name	**Date**
Parsons Manager (Program, Sector, or Operations)		