



30-30 Thomson Avenue
Long Island City, NY 11101

March 28, 2023

Mr. Bryan Wong
Project Manager
Division of Environmental Remediation, Region 2
New York State Department of Environmental Conservation
47-40 21st Street
Long Island City, NY 11101

RE: Excavation Work Plan
650 Waring Avenue, Bronx, New York 10467
Block 4341, Lot 13
NYSDEC BCP Site No. C203068
SCA LLW #109666

Dear Mr. Wong,

The New York City School Construction Authority (NYCSCA) has prepared the enclosed Excavation Work Plan (EWP) for the NYSDEC Brownfield Cleanup Program (BCP) Site located at 650 Waring Avenue, Bronx, New York.

This EWP was prepared in support of a playground renovation project at the Public School 96X Site. Scope of work items include the following:

- Asphalt removal;
- Limited excavation of soil for the installation of footings for a new playground structure (maximum excavation depth of approximately 4 feet below the ground surface);
- Environmental sampling at the termination depth of excavation;
- Characterization, management, and disposal of excavated soil generated during the work; and
- Restoration of the area of disturbance and installation of a 3-inch thick safety surface tile.

The proposed work area is shown on the attached Design Drawing A035 and details related to the footing excavation and restoration are shown on Drawings A050 and A051.

The following will be performed in order to minimize concerns related to potential exposure to contamination at the Site during execution of the scope of work outlined above:

- Implementation of EWP and Project Specification requirements for the excavation, handling, and disposal of soil generated during the project;
- Implementation of EWP and Project Specification requirements for stormwater pollution prevention during completion of the Work;
- Implementation of EWP and Project Specification requirements for documenting backfill and restoration in the work area; and,

- Construction oversight by a representative under direct supervision of the Qualified Environmental Professional (QEP) certifying the EWP, including review of pre-construction Plans and documentation submittals, performance of soil screening, and implementation of a Community Air Monitoring Program (CAMP) during ground-intrusive activities.

Please do not hesitate to contact me at (718) 472-8502 or via email at dguterman@nycsca.org if you have any questions.

Sincerely,

New York City School Construction Authority

Lee Guterman
Director, HazMat Unit
Industrial & Environmental Hygiene Division

cc: J. O'Connell (NYSDEC)
C. Ondrusek (NYCSCA)
S. Kanaparthi (NYCSCA)
M. Wagner (NYCSCA)
M. Sherwood (NYCSCA)
K. Boger (TRC)
J. Raup (TRC)

Attachment – Brownfield Cleanup Program Excavation Work Plan for 650 Waring Avenue,
Bronx, New York 10467

650 WARING AVENUE SITE

**650 WARING AVENUE
BRONX, NEW YORK 10467**

Excavation Work Plan

**Public School 96X
Playground Renovation Project
NYSDEC Brownfield Cleanup Program Site Number C203068**

Prepared for:

New York City School Construction Authority
30-30 Thomson Avenue
Long Island City, NY 11101

Prepared by:

TRC Engineers, Inc.
1430 Broadway, 10th Floor
New York, NY 10018
(212) 221-7822

MARCH 2023

CERTIFICATIONS

I, Kevin Boger, P.E., certify that I am currently a NYS registered professional engineer and that this Excavation Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

I certify that all information and statements in this certification are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.



096717
NYS Professional Engineer #

MARCH 27, 2023
Date

Signature

It is a violation of Article 145 of New York State Education Law for any person to alter this document in any way without the express written verification of adoption by any New York State licensed engineer in accordance with Section 7209(2), Article 145, New York State Education Law.

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LIST OF ACRONYMS

Acronym	Definition
BCP	Brownfield Cleanup Program
CAMP	Community Air Monitoring Plan
COU	Change of Use
CP	Commissioner Policy
CP-51	CP Soil Cleanup Guidance
DER	Division of Environmental Remediation
DER-10	DER Technical Guidance for Site Investigation and Remediation
DQO	Data Quality Objective
DUSR	Data Usability Summary Report
ELAP	Environmental Laboratory Approval Program
HASP	Health and Safety Plan
NYCDEP	New York City Department of Environmental Protection
NYCMTA	New York City Metropolitan Transportation Authority
NYCRR	New York Codes, Rules and Regulations
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
NYSDOT	New York State Department of Transportation
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyl
PID	Photoionization Detector
QA/QC	Quality Assurance/Quality Control
QAPP	Quality Assurance Project Plan
RI	Remedial Investigation
SCGs	Standards, Criteria and Guidance
SCO	Soil Cleanup Objective
SOE	Support of Excavation
SoMP	Soils/Materials Management Plan
TAL	Target Analyte List
TCL	Target Compound List
TRC	TRC Engineers, Inc.
USGS	United States Geological Survey
UST	Underground Storage Tank
VOC	Volatile Organic Compound

1.0 INTRODUCTION

On behalf of New York City School Construction Authority (NYCSCA), TRC Engineers, Inc. (TRC) has prepared this Excavation Work Plan (EWP) for the 650 Waring Avenue Site located at 650 Waring Avenue, Bronx, New York 10467 (hereafter referred to as the “Site”). The legal description of the Site is Block 4341, Lot 13. The Site is an approximately 79,000-square foot lot improved with the four-story Public School 96X (P.S. 96X) building with a basement and an asphalt-paved play yard. The proposed work for the EWP consists of a playground renovation project at the Public School 96X Site to install a new playground structure and safety surface tile. Scope of work items include the following:

- Localized removal of asphalt pavement in the new footing areas;
 - Limited excavation of soil for the installation of footings for a new playground structure (maximum excavation depth of approximately 4 feet below the ground surface);
 - Collection of environmental samples at the bottom of the footing excavation(s) at two locations;
 - Characterization, management, and disposal of excavated soil generated during the work (Approximately 6 cubic yards of excavated material is expected to be generated and disposed during completion of the Work); and,
 - Restoration of the area of disturbance and installation of a 3-inch-thick safety surface tile.
- No soil is expected to be imported to the Site as part of the renovation project.

This Excavation Work Plan presents the procedures required when performing the proposed excavation activities at the Site. The actions described in this document are consistent with the procedures defined in DER-10 and comply with all applicable standards, criteria and guidance. The excavation procedures described in this document also comply with all applicable federal, state and local laws, regulations and requirements. The proposed work area is shown on the attached Design Drawing A035 and details related to the footing excavation and restoration are shown on Drawings A050 and A051.

2.0 NOTIFICATION

At least 15 days prior to the start of any activity that is anticipated to encounter remaining contamination or breach or alter the site's cover system, the site owner or their representative will notify the NYSDEC contacts listed in the table below. Table 1 includes contact information for the above notification. The information on this table will be updated as necessary to provide accurate contact information.

Table 1: Notifications*

Bryan Wong NYSDEC Project Manager	(718) 482-4905 yukylin.wong@dec.ny.gov
Jane O'Connell NYSDEC Regional Remediation Engineer	(718) 482-4599 jane.oconnell@dec.ny.gov
Jacquelyn Nealon NYSDOH Project Manager	(518) 402-7883 Jacquelyn.nealon@health.ny.gov
Lee Guterman Property Owner Representative: New York City School Construction Authority	(718) 472-8502 DGuterman@nycsca.org
Kevin Boger, PE Qualified Environmental Professional	(631) 617-0087 KBoger@trccompanies.com

* Note: Notifications are subject to change and will be updated as necessary.

This notification will include:

- An electronic copy of the Contractor's Excavated Material Disposal Plan (EMDP), which will include estimated volumes of soil and other waste streams to be excavated and disposed off-site, results for waste characterization sampling, applicable permits for disposal facilities and waste transporters for all waste streams; and conditional disposal approval letter(s) from the proposed disposal facilities.
- A schedule for the work, detailing the start and completion of all intrusive work;
- A copy of the contractor's health and safety plan (HASP), in electronic format;

- If soil is proposed for import to the Site, identification of sources of any anticipated backfill will be provided along with the required request to import form and all supporting documentation including, but not limited to, chemical testing results.
- If waste characterization results identify any environmental conditions that differ from the current conditions noted in Section 3.0 of this EWP, the notification will include a summary of environmental conditions to be encountered in the work areas, including the nature and concentration levels of contaminants of concern, and potential presence of grossly contaminated media.

The NYSDEC project manager will review the notification and may impose additional requirements for the excavation that are not listed in this EWP.

3.0 SOIL SCREENING METHODS

Visual, olfactory and instrument-based (e.g. photoionization detector) soil screening will be performed during all excavations into known or potentially contaminated material (remaining contamination) or a breach of the cover system. A qualified environmental professional as defined in 6 NYCRR Part 375, a PE who is licensed and registered in New York State, or a qualified person who directly reports to a PE who is licensed and registered in New York State will perform the screening. Soil screening will be performed during all excavation and invasive work performed during the proposed playground renovation project.

Based on the results for soil samples previously collected in the area of the proposed work, all excavated material is expected to be characterized as non-hazardous excavated material (NHEM). Additionally, groundwater is not expected to be encountered during completion of the Work. Waste characterization testing will be performed by the Contractor prior to soil excavation activities in accordance with the sampling requirements of the proposed soil disposal facility(ies). At a minimum, one composite sample comprised of several sample locations will be collected and analyzed. All materials that requires off-site disposal will ultimately be managed based on waste characterization testing, photoionization detector (PID) soil screening findings, and visual observations. No soil/excavated material reuse will be permitted during the project. Further discussion of off-site disposal of materials is provided in Sections 7 and 8 of this Work Plan.

4.0 SOIL STAGING METHODS

If not direct-loaded into vehicles or drums for disposal, soil will be permitted to be stockpiled onsite in a lined roll-off container. Stockpiling of soil without use of a lined roll-off container will not be

permitted during the project. Roll-off containers containing excavated soil will be kept covered at all times with appropriately anchored tarps. Roll-off containers will be routinely inspected and damaged tarp covers will be promptly replaced. Roll-off containers will be inspected at a minimum once each week and after every storm event.

5.0 MATERIALS EXCAVATION AND LOAD-OUT

A qualified environmental professional as defined in 6 NYCRR Part 375, a PE who is licensed and registered in New York State, or a qualified person who directly reports to a PE who is licensed and registered in New York State will oversee all invasive work and the excavation and load-out of all excavated material. The owner of the property and its contractors are responsible for safe execution of all invasive and other work performed under this Plan.

The presence of utilities and easements on the site will be investigated by the qualified environmental professional. It will be determined whether a risk or impediment to the planned work under this EWP is posed by utilities or easements on the site. A site utility stakeout will be completed for all utilities prior to any ground intrusive activities at the site.

The work area will be restricted and dust control measures will be used during soil excavation activities to minimize airborne particles from leaving the work zone in accordance with the CAMP requirements of Section 15.0. If work is required to be completed while school is in session, 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 will be determined in consultation with NYSDOH.

Loaded vehicles leaving the site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, NYSDOT requirements, and all other applicable transportation requirements.

Due to the limited extent of asphalt removal anticipated during excavation activities, vehicles will only be loaded on impervious surfaces. As a result, a truck wash will not be operated during performance of the Work. If vehicles are loaded in non-impervious areas, the qualified environmental professional will be responsible for ensuring that all outbound trucks are inspected before leaving the site until the activities performed under this section are complete. If necessary, truck wash waters will be collected and disposed of off-site in an appropriate manner. Locations where vehicles enter or exit the site shall be inspected daily for evidence of off-site soil tracking.

The qualified environmental professional will be responsible for ensuring that all egress points for truck and equipment transport from the site are clean of dirt and other materials derived from the

site during intrusive excavation activities. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials. Material accumulated from the street cleaning and egress cleaning activities will be disposed off-site at a permitted disposal facility in accordance with all applicable local, State, and Federal regulations.

6.0 ENVIRONMENTAL TESTING

During construction activities, environmental soil samples will be collected at the termination depth of the footing excavation(s) at two (2) locations. Soil samples will be collected once footing excavations have reached their terminal depth, which is estimated to be approximately 3 to 4 feet below ground surface (bgs) and prior to footing installations. The soil sampling program will include the following:

- At two proposed locations (TRC-EX-1 and TRC-EX-2), hand tools will be used to advance soil borings at the bottom of the footing excavation (estimated to be approximately 3 to 4 feet bgs).
- Soil samples collected from each boring will be screened with a PID and inspected for indications of contamination (e.g., staining, odors, etc.). Geologic descriptions of the soil and field screening results will be recorded in field logs.
- Soil samples will be analyzed for the following compounds:
 - Target Compound List (TCL) and NYSDEC CP-51-listed VOCs plus the 10 highest concentration tentatively identified compounds (TICs);
 - TCL and CP-51-listed semivolatile organic compounds (SVOCs) (including 1,4-dioxane) plus the 20 highest concentration TICs;
 - Target Analyte List (TAL) metals and cyanide;
 - TCL pesticides;
 - TCL herbicides;
 - Polychlorinated biphenyls (PCBs); and
 - Per- and polyfluoroalkyl substances (PFAS) compounds.
- Duplicate samples will be collected at a frequency of 1 per 20 soil samples and analyzed for the parameters listed above. Equipment blank samples will be collected at a frequency of 1 per day and analyzed for the parameters listed above. A trip blank will be analyzed at a frequency of one per cooler per day that contains soil samples for analysis of VOCs.
- Soil samples will be containerized in laboratory prepared jars, labeled, sealed, and placed in a chilled cooler for shipment to a NYSDOH Environmental Laboratory Approval

Program (ELAP)-certified laboratory for analysis. NYSDEC Analytical Services Protocol (ASP) Category B deliverable packages will be provided.

Locations of proposed environmental samples can be found on the attached Drawing A035. Samples will be analyzed in accordance with the QAPP included as *Appendix B*.

7.0 MATERIALS TRANSPORT OFF-SITE

All transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded. Material transported by trucks exiting the site will be secured with tight-fitting covers. Covers will be secured in an appropriate manner and will remain in place until the container has reached the disposal facility. If loads contain wet material capable of producing free liquid, truck liners will be used.

Truck transport routes are as follows: 1) Enter playground Site from the east via Olinville Avenue; 2) Exit Site to the west via Barker Avenue and head south toward Thwaites Place; 3) Turn left onto Thwaites Place and then turn right on Boston Road; and proceed to disposal facility. All trucks loaded with site materials will exit the vicinity of the site using only these approved truck routes. This is the most appropriate route and takes into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport.

Trucks will be prohibited from stopping and idling in the neighborhood outside the project site. Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during site remediation and development. Queuing of trucks will be performed on-site in order to minimize off-site disturbance. Off-site queuing will be prohibited.

8.0 MATERIALS DISPOSAL OFF-SITE

All material excavated and removed from the site will be treated as regulated material and will be transported and disposed off-site in a permitted facility in accordance with all local, State and Federal regulations. If disposal of material from this site is proposed for unregulated off-site disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC project manager. Unregulated off-site management of materials from this site will not occur without formal NYSDEC project manager approval.

Off-site disposal locations for excavated soils will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate,

(e.g. hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C&D debris recovery facility). Site soils taken off-site will be handled consistent with 6 NYCRR Parts 360, 361, 362, 363, 364 and 365. Material that does not meet Unrestricted SCOs is prohibited from being taken to a New York State C&D debris recovery facility (6 NYCRR Subpart 360-15 registered or permitted facility).

Daily reports will be prepared and submitted to NYSDEC the following work day and will include the following:

- An update of progress made during the reporting day;
- Locations of work and quantities of material imported to and exported from the Site;
- References to the Site Plan for Site activities;
- A summary of any and all complaints with relevant details (names, phone numbers);
- A summary of CAMP finding, including excursions; and,
- An explanation of notable Site conditions.

Actual disposal quantities and associated documentation will be reported to the NYSDEC in the Monthly Progress Report provided for the Site following receipt of fully-executed disposal documentation at the completion of the playground renovation project. This documentation will include, but will not be limited to: waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

9.0 MATERIALS REUSE ON-SITE

No excavated material will be permitted to be reused on-Site.

10.0 FLUIDS MANAGEMENT

Excavation dewatering is not expected to be performed during completion of the Work. If necessary, all liquids to be removed from the site, including but not limited to, decontamination water will be handled, transported and disposed off-site at a permitted facility in accordance with applicable local, state, and federal regulations.

11.0 COVER SYSTEM RESTORATION

The existing cover system in the proposed work area is comprised of asphalt pavement underlain by aggregate subbase. After the completion of soil removal and any other invasive activities, the

cover system will be restored. The proposed surface restoration includes a 3-inch-thick safety surface tile underlain by asphalt pavement and aggregate subbase. The existing asphalt pavement detail and safety surface section detail are provided on the attached Design Drawing A050 – Details I.

12.0 BACKFILL FROM OFF-SITE SOURCES

Import of soil for use as backfill is not anticipated as part of the Work. However, if required, all materials proposed for import onto the site will be approved by the qualified environmental professional, as defined in 6 NYCRR Part 375, and will be in compliance with provisions in this EWP prior to import to the site. A Request to Import/Reuse Fill or Soil form, which can be found at <http://www.dec.ny.gov/regulations/67386.html>, will be prepared and submitted to the NYSDEC project manager allowing a minimum of 5 business days for review. Material from industrial sites, spill sites, other environmental remediation sites, or potentially contaminated sites will not be imported to the site.

All soil proposed for import must be tested for all analytical parameters for which there is a Protection of Groundwater and/or Protection of Public Health – Residential Land Use Soil Cleanup Objective (SCO) listed in NYSDEC 6 NYCRR Part 375-6.8(b), plus the full list of 40 target Per- and Polyfluoroalkyl Substances (PFAS) compounds listed in NYSDEC PFAS Guidance titled, “Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC’s Part 375 Remedial Programs”, dated November 2022. PFAS compounds will be analyzed by EPA Method 1633. The results must contain no analytes at concentrations above the lower of the Protection of Groundwater and Protection of Public Health – Residential Land Use SCOs set forth in NYSDEC 6 NYCRR Part 375-6.8(b). Additionally, material proposed for import must contain a PFOA and PFOS concentration lower than the respective Guidance Values for Residential and Protection of Groundwater Site Use as listed in the NYSDEC PFAS Guidance Document.

Solid waste will not be imported onto the site. Trucks entering the site with imported soils will be securely covered with tight fitting covers. Imported soils will be stockpiled separately from excavated materials and covered to prevent dust releases.

13.0 STORMWATER POLLUTION PREVENTION

Limited asphalt removal is anticipated to complete the project. Additionally, the stockpiling of excavated soil without use of a roll-off container will not be permitted during the project and no soil is expected to be imported to the site during the project. Any imported material that is

stockpiled at the Site will be stored in such a manner as to prevent erosion and dust. Stockpiles of imported material will be covered with heavy duty tarps, manufactured for the intended purpose and secured with sandbags, to prevent erosion. Stockpiles will be covered at all times when material is not being sampled, added, or removed. Additionally, the perimeters of stockpiles will be surrounded by straw bales. Any material stockpiles will be inspected daily and immediately after rainfall. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by the NYSDEC. All necessary repairs shall be made immediately.

14.0 EXCAVATION CONTINGENCY PLAN

If underground tanks or other previously unidentified contaminant sources are found during subsurface excavations or development-related construction, excavation activities will be suspended until sufficient equipment is mobilized to address the condition. The NYSDEC project manager will be promptly notified of the discovery.

Sampling will be performed on product, sediment, and surrounding soils, etc. as necessary to determine the nature of the material and proper disposal method. Chemical analysis will be performed for a full list of analytes (TAL metals, TCL volatiles and semivolatiles [including 1,4-dioxane], TCL pesticides and PCBs, and PFAS), unless the site history and previous sampling results provide sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC project manager for approval prior to sampling. Any tanks will be closed as per NYSDEC regulations and guidance.

Identification of unknown or unexpected contaminated media identified by screening during invasive site work will be promptly communicated by phone within two hours to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in the subsequent Progress Report.

15.0 COMMUNITY AIR MONITORING PLAN

The Community Air Monitoring Plan (CAMP) is provided in Appendix A of this EWP and will be in place during ground intrusive activities. A figure showing the location of air sampling stations based on generally prevailing wind conditions is shown on the attached Design Drawing A035 – Site Plan. These locations will be adjusted on a daily or more frequent basis based on actual wind directions to provide an upwind and at one downwind monitoring station. Exceedances of action levels listed in the CAMP as well as corrective actions taken will be reported to the NYSDEC and NYSDOH Project Managers the same day as the exceedance.

16.0 ODOR CONTROL PLAN

This odor control plan is capable of controlling emissions of nuisance odors offsite during excavation activities. Implementation of odor control methods is not anticipated based on previous site investigations. Specific odor control methods to be used on a routine basis will include the use of foams, neutralizing agents, encapsulants and tarps. If nuisance odors are identified at the site boundary, or if odor complaints are received, work will be halted and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. NYSDEC and NYSDOH will be notified of all odor events and of any other complaints about the project. Implementation of all odor controls, including the halt of work, is the responsibility of the QEP and QEP's representative, and any measures that are implemented will be reported to NYSDEC and NYSDOH Project Managers.

All necessary means will be employed to prevent on- and off-site nuisances. At a minimum, these measures will include: (a) limiting the area of open excavations and duration roll-off container(s) of stockpiled soil are kept onsite; (b) shrouding open excavations with tarps and other covers; and (c) using foams to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: (d) direct load-out of soils to trucks for off-site disposal; (e) use of chemical odorants in spray or misting systems; and, (f) use of staff to monitor odors in surrounding neighborhoods.

If nuisance odors develop during intrusive work that cannot be corrected, or where the control of nuisance odors cannot otherwise be achieved due to on-site conditions or close proximity to sensitive receptors, odor control will be achieved by sheltering the excavation and handling areas in a temporary containment structure equipped with appropriate air venting/filtering systems.

17.0 DUST CONTROL PLAN

Particulate monitoring must be conducted according to the CAMP provided in Section 15 during ground intrusive activities. If particulate levels at the site exceed the thresholds listed in the CAMP or if airborne dust is observed on the site or leaving the site, the dust suppression techniques listed below will be employed. The QEP and QEP representative will also take measures listed below to prevent dust production on the site.

The following dust suppression techniques will be used to address dust management during invasive on-site work:

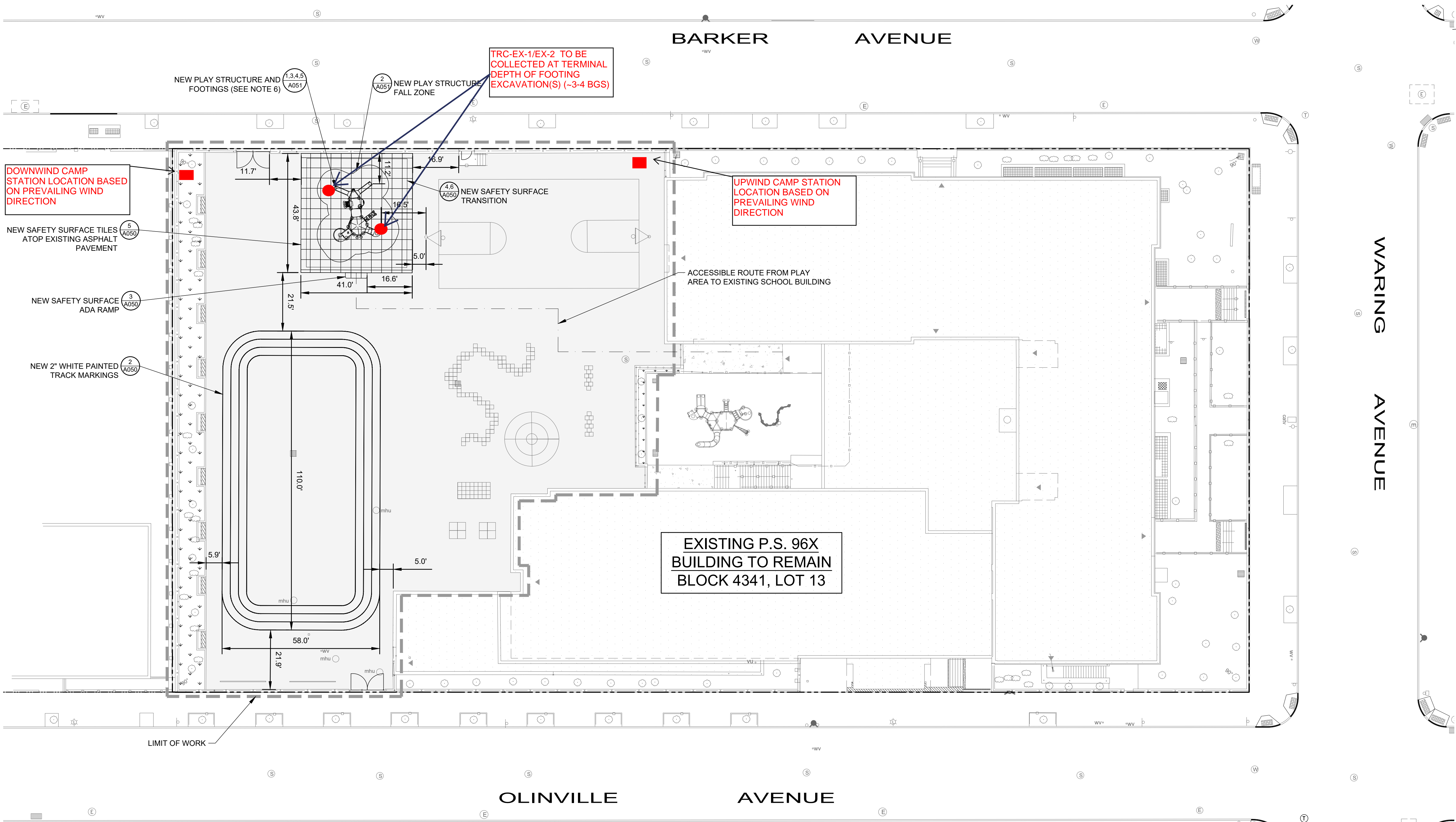
- Dust suppression will be achieved using a dedicated on-site water source for road wetting. The water source will be capable of spraying water directly onto off-road areas including excavations and stockpiles.

- Asphalt removal will be limited to minimize the need for dust suppression. Gravel will be used on any non-paved roadways to provide a clean and dust-free road surface.

18.0 OTHER NUISANCES

All work performed under this EWP will be completed in compliance with local noise control ordinances.

FIGURES

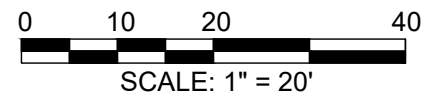


LEGEND

- PROPERTY LINE
- - - - - ADJACENT PROPERTY LINE
- LIMIT OF WORK
- EXISTING BUILDING
- - - - - ACCESSIBLE ROUTE
- EXISTING 16-FT HIGH CHAIN LINK FENCE ATOP 12\"/>
- EXISTING ASPHALT PAVEMENT
- EXISTING PLANTED AREA
- EXISTING CONCRETE PAVEMENT
- NEW SAFETY SURFACE TILES ATOP EXISTING ASPHALT PAVEMENT
- EXISTING ON-SITE TREE
- EXISTING MANHOLE
- EXISTING YARD DRAIN
- BUILDING ENTRANCE

NOTES:

- ALL FEATURES TO REMAIN ARE TO BE PROTECTED THROUGHOUT CONSTRUCTION. ANY DAMAGE WILL BE THE RESPONSIBILITY OF THE CONTRACTOR AND MUST BE REPAIRED OR REPLACED AT THE AUTHORITY/ENGINEER'S DIRECTION AT NO COST TO THE AUTHORITY.
- ALL EXISTING PLAY MARKING SIZES, EXTENTS, AND LOCATIONS WERE TAKEN FROM ALCHEMY DRAWING TITLED "PS 96X RENOVATION SITE PLAN", LAST UPDATED 10/27/2017. CONTRACTOR TO REPORT ANY DISCREPANCIES TO THE ENGINEER PRIOR TO CONSTRUCTION.
- FLOOR SURFACES SHALL COMPLY WITH ICC A117.1 #302. NO OPENINGS OF GRATES OR DEEP GAS/JOINTS OF FLOOR GRADE SURFACES SHOULD BE MORE THAN 0.5\"/>
- THE RUNNING SLOPE OF WALKING SURFACES SHALL NOT BE STEEPER THAT 1:20. THE CROSS SLOPE OF A WALKING SURFACE SHALL NOT BE STEEPER THAN 1:48.
- CHANGES IN LEVEL SHALL COMPLY WITH ICC A117.1 #303. BEVELED EDGE RATIO SHALL BE 1:2 MAXIMUM.
- CONTRACTOR SHALL REPAIR ASPHALT PAVEMENT AS NEEDED TO INSTALL PLAY STRUCTURE FOOTINGS. CONTRACTOR SHALL ENSURE THAT A FLUSH SURFACE WITH NO VOIDS BETWEEN PROPOSED FOOTINGS AND EXISTING PAVEMENT IS PROVIDED AFTER INSTALLATION OF PLAY STRUCTURE FOOTING AND PRIOR TO INSTALLATION OF SAFETY SURFACE TILES.



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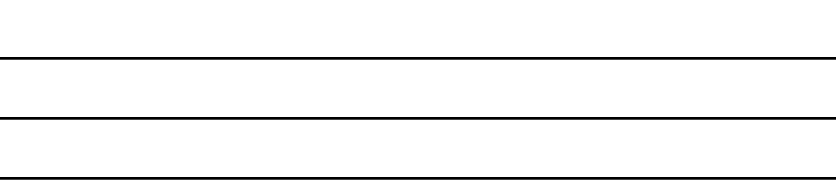
Consultants:



Preliminary
Not For Construction

NOTE: Drawing may be printed at reduced scale

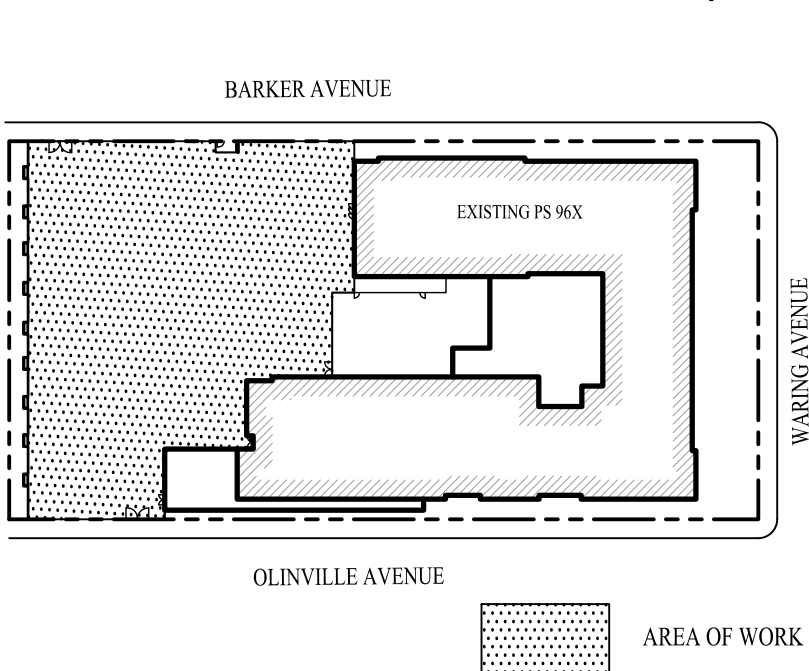
IT IS A VIOLATION OF THE STATE EDUCATION LAW SECTION 7209 (2) FOR ANY PERSON TO ALTER AN ITEM IN ANY WAY UNLESS SUCH PERSON IS ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, AND THE ENGINEER STAMPS SUCH CHANGES



10/14/2022 90% IEH SUBMISSION

No.	Date	Revision
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Key Plan:



Block # 4341 Lot # 13

SCA Design Manager: LISA MANN, R.A., LEED AP BD+C, CPHD

Project Architect/Engineer: ROBERT CARAVELLA, P.E.

Discipline Lead: ROBERT CARAVELLA, P.E.

Designer: SARAH CARLTON

Drawn by: MOLLY HOGAN

Checked by: TIMOTHY M. LAVIN, P.E.

Design No: D021488	Building ID: X096	Date: 10/14/2022
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Project:
PS 96 - BRONX
FY22 RESO A PLAYGROUND UPGRADE

Address:
2385 OLINVILLE AVENUE
BRONX, NY 10467

Drawing Title:

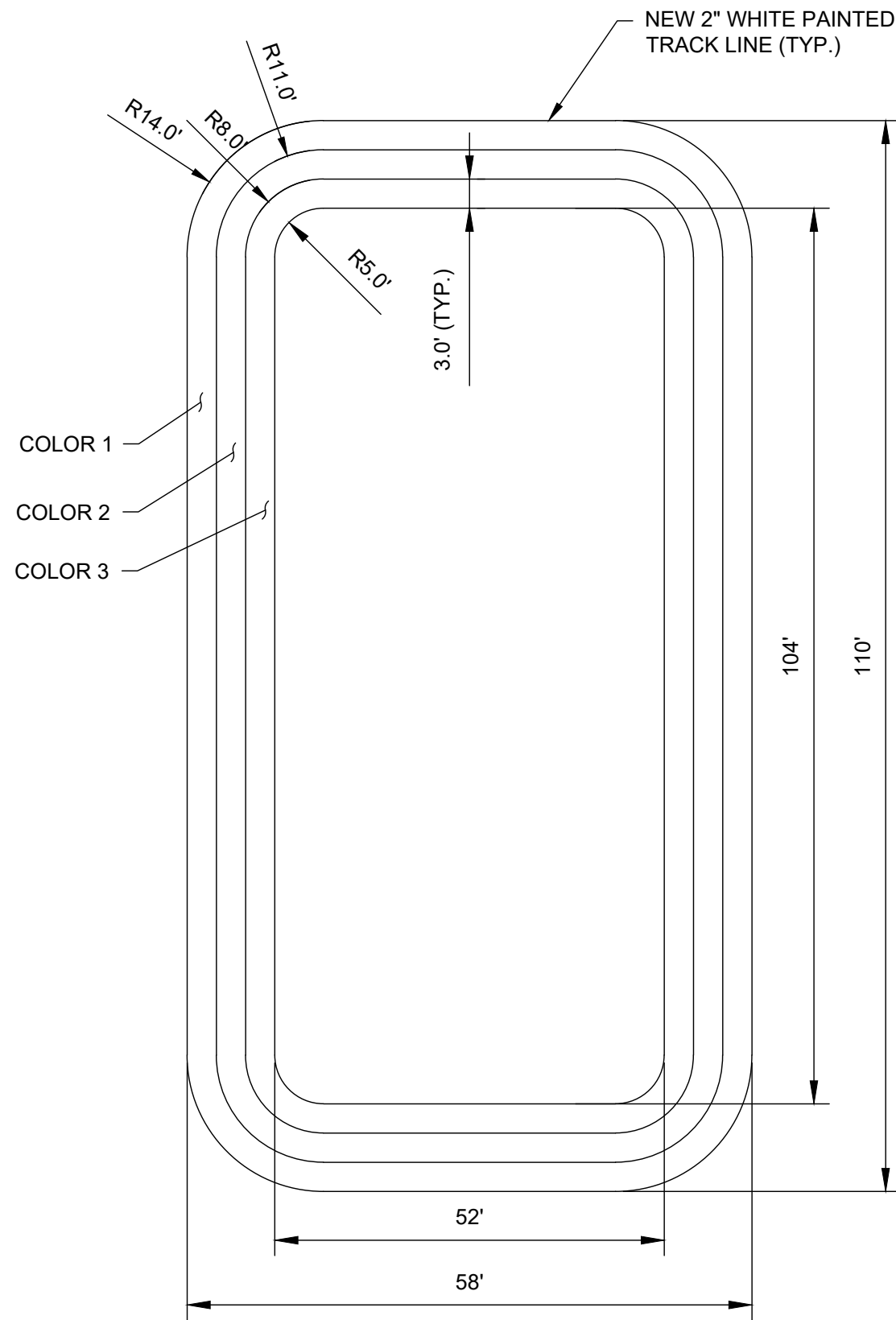
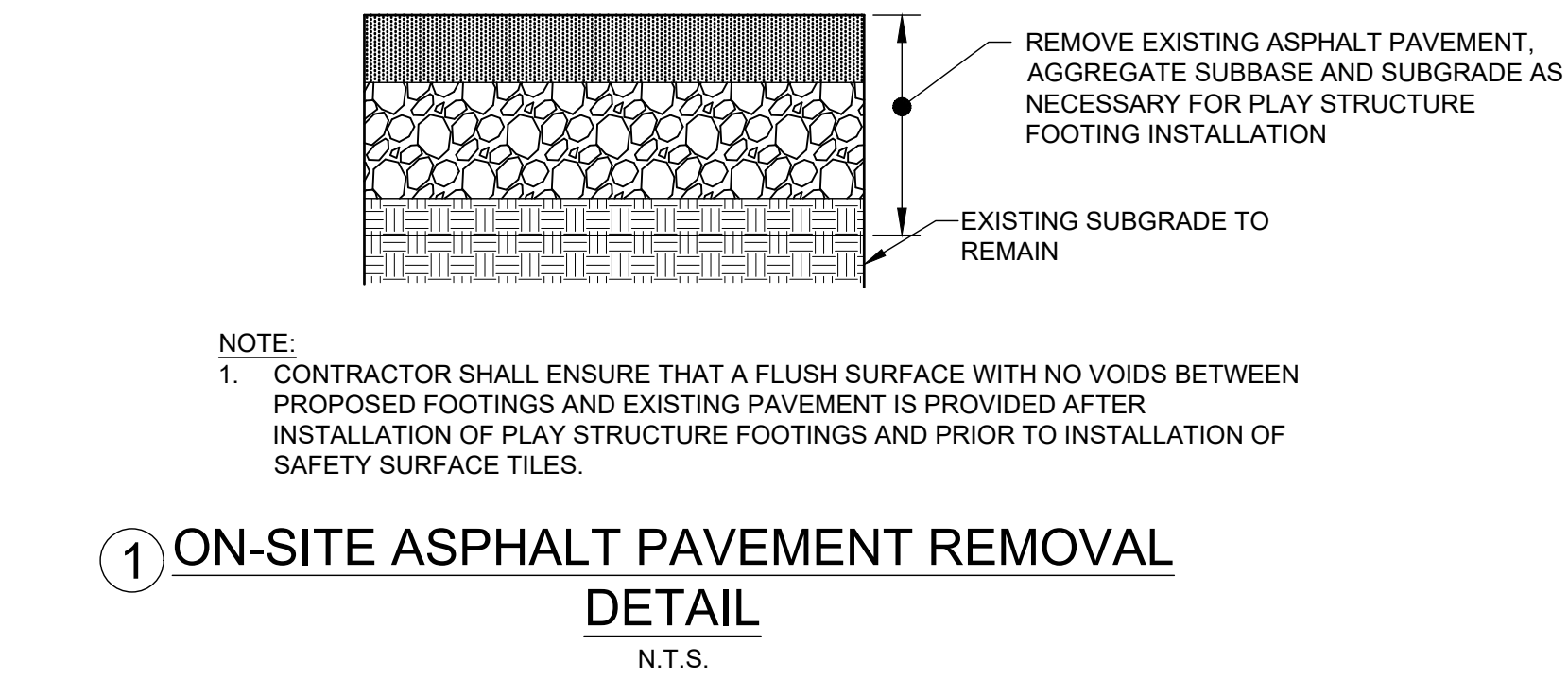
SITE PLAN

Drawing No.:

A035.00

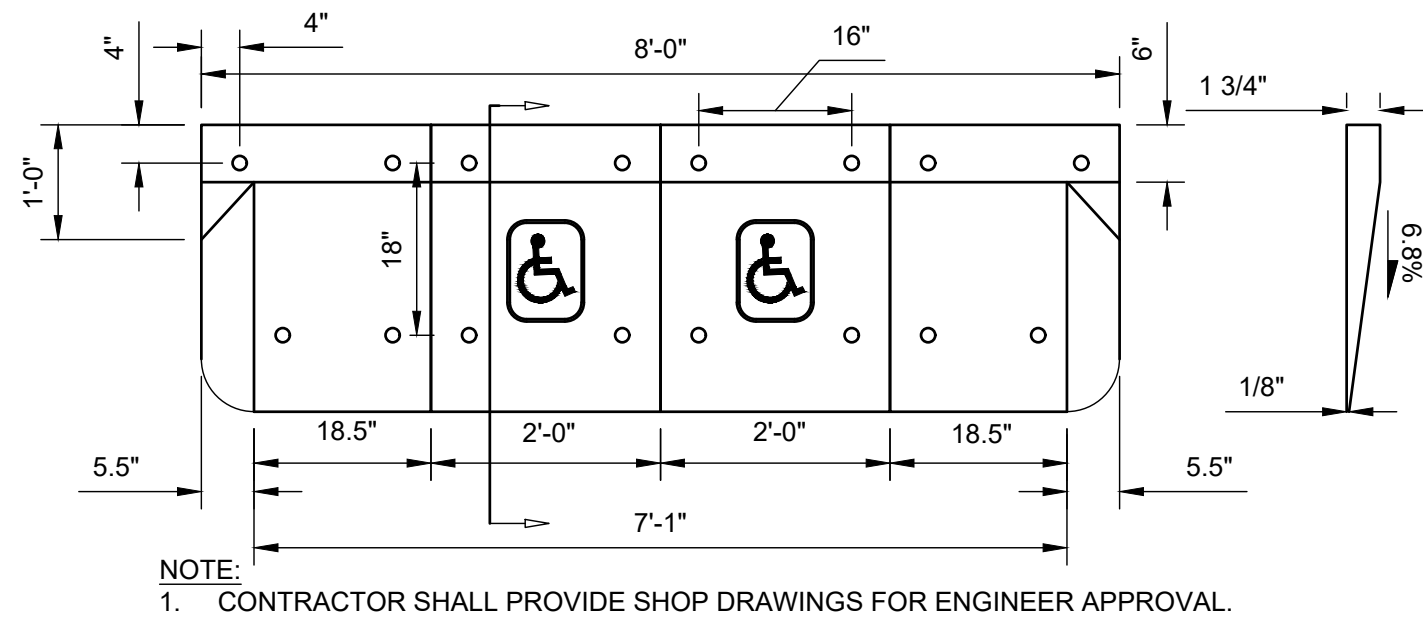
Sheets in Contract Set:
05 of 09

Sheets in DOB Set:
04 of 06

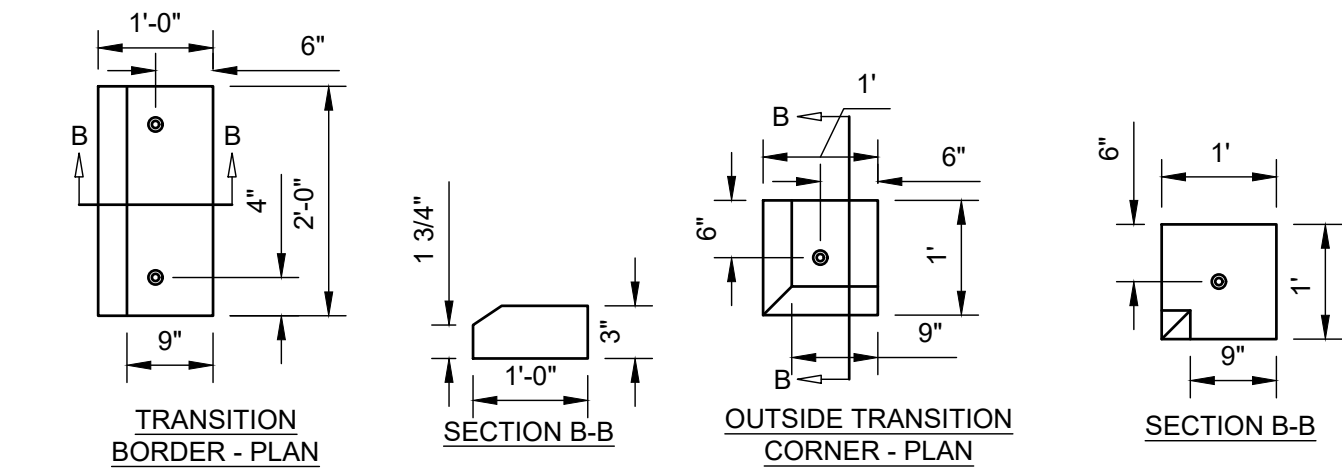


- NOTES:
1. ALL PAINTED LINES SHALL BE PAINTED WHITE AND BE 2" WIDE.
2. ASSUME THREE COLORS OF PAINT BETWEEN TRACK LINES, COLORS TO BE SELECTED BY SCHOOL.
3. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS FOR MARKINGS, INDICATING ALL DIMENSIONS AND COLORS, PROVIDE COLOR SAMPLES.

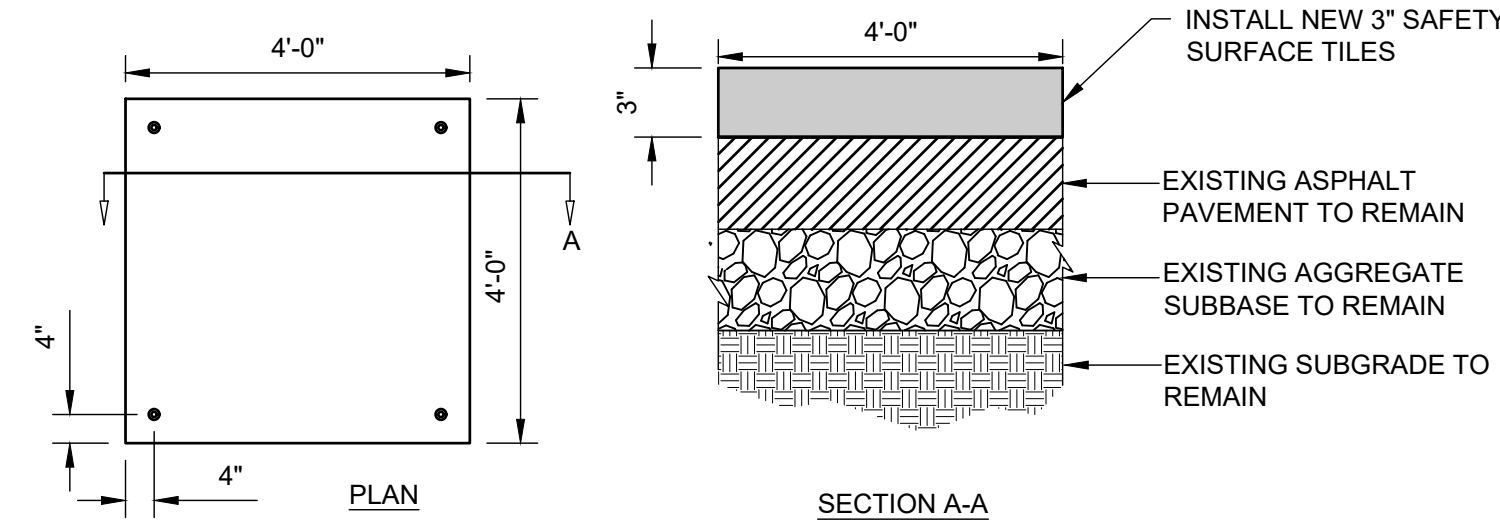
② TRACK MARKING LAYOUT DETAIL
N.T.S.



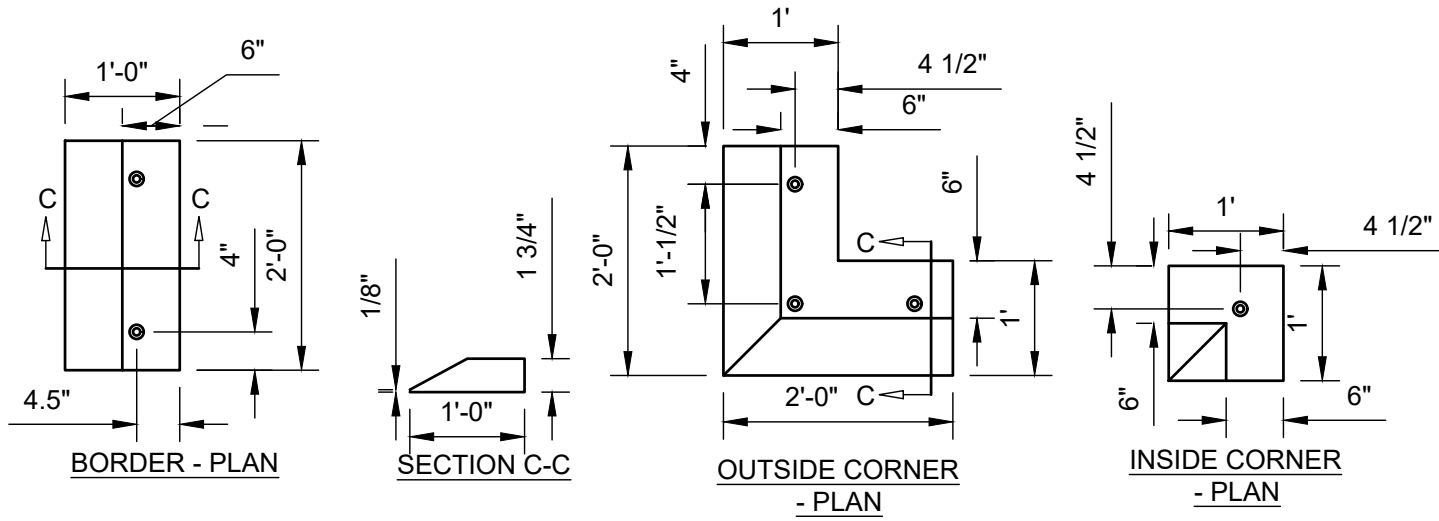
③ SAFETY SURFACE - ADA ACCESSIBLE
RAMP DETAIL
N.T.S.



④ SAFETY SURFACE - TRANSITION RAMP
SECTION 3" TO 1-3/4" DETAIL
N.T.S.



⑤ SAFETY SURFACE - CENTER
SECTION DETAIL
N.T.S.



⑥ SAFETY SURFACE - TRANSITION RAMP
SECTION 1-3/4" TO 1/8" DETAIL
N.T.S.

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In-House Design Studio
Maria A. Gómez, P.E., LEED A.P. BD+C, Senior Director

Consultants:



Preliminary
Not For Construction

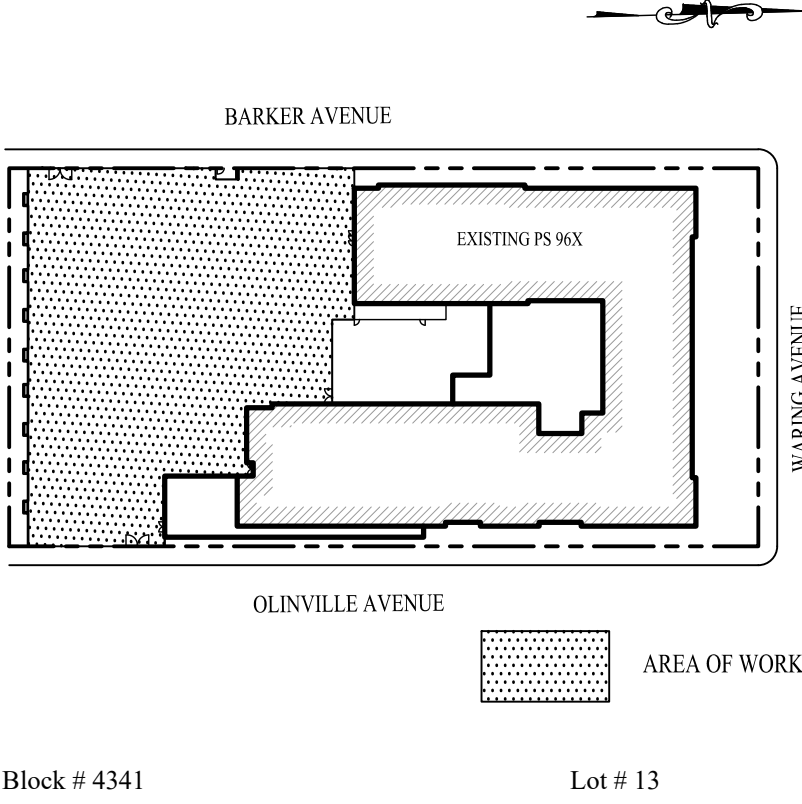
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No. Date Revision

Key Plan:



SCA Design Manager:		LISA MANN, R.A., LEED AP BD+C, CPHD	
Project Architect/Engineer:		ROBERT CARAVELLA, P.E.	
Discipline Lead:		ROBERT CARAVELLA, P.E.	
Designer:		SARAH CARLTON	
Drawn by:		MOLLY HOGAN	
Checked by:		TIMOTHY M. LAVIN, P.E.	
Design No: D021488	Building ID: X096	Date:	10/14/2022

Project:
PS 96 - BRONX
FY22 RESO A PLAYGROUND UPGRADE

Address:
2385 OLINVILLE AVENUE
BRONX, NY 10467

Drawing Title:

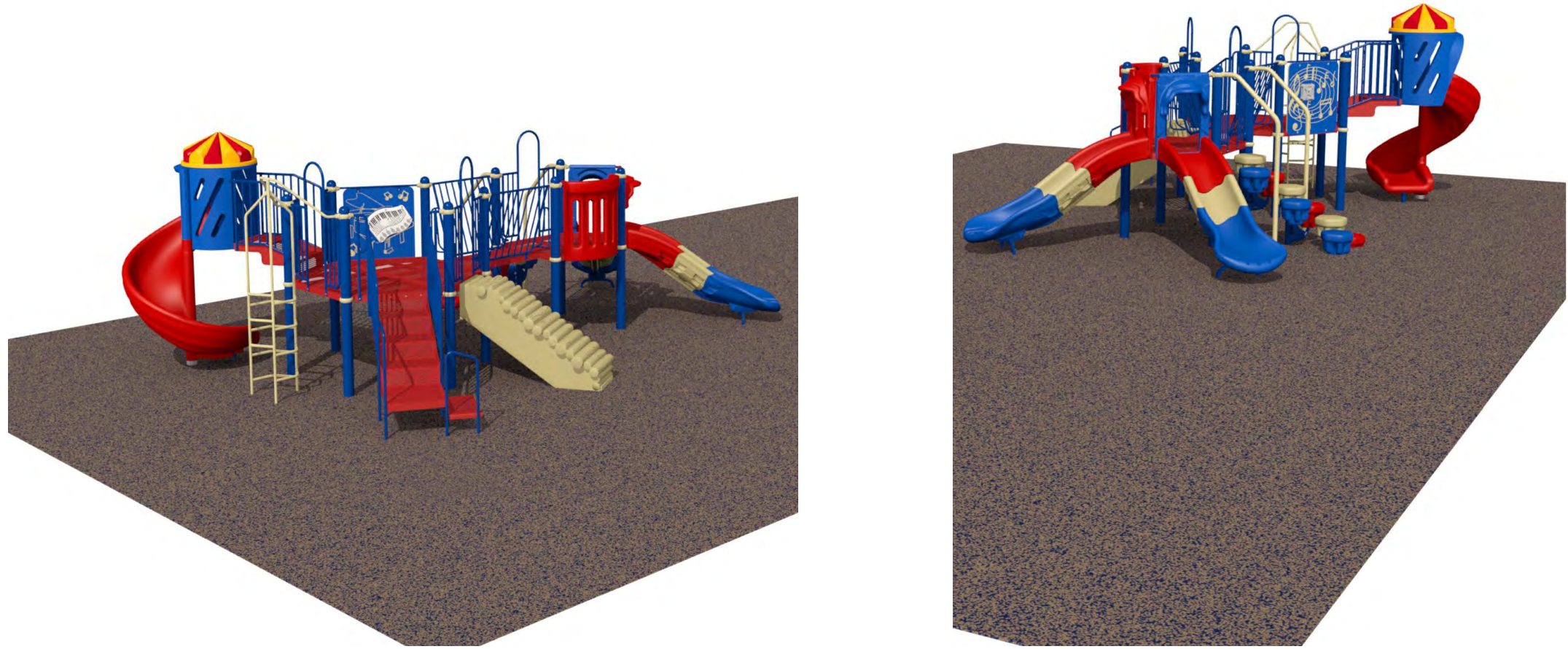
DETAILS I

Drawing No.:

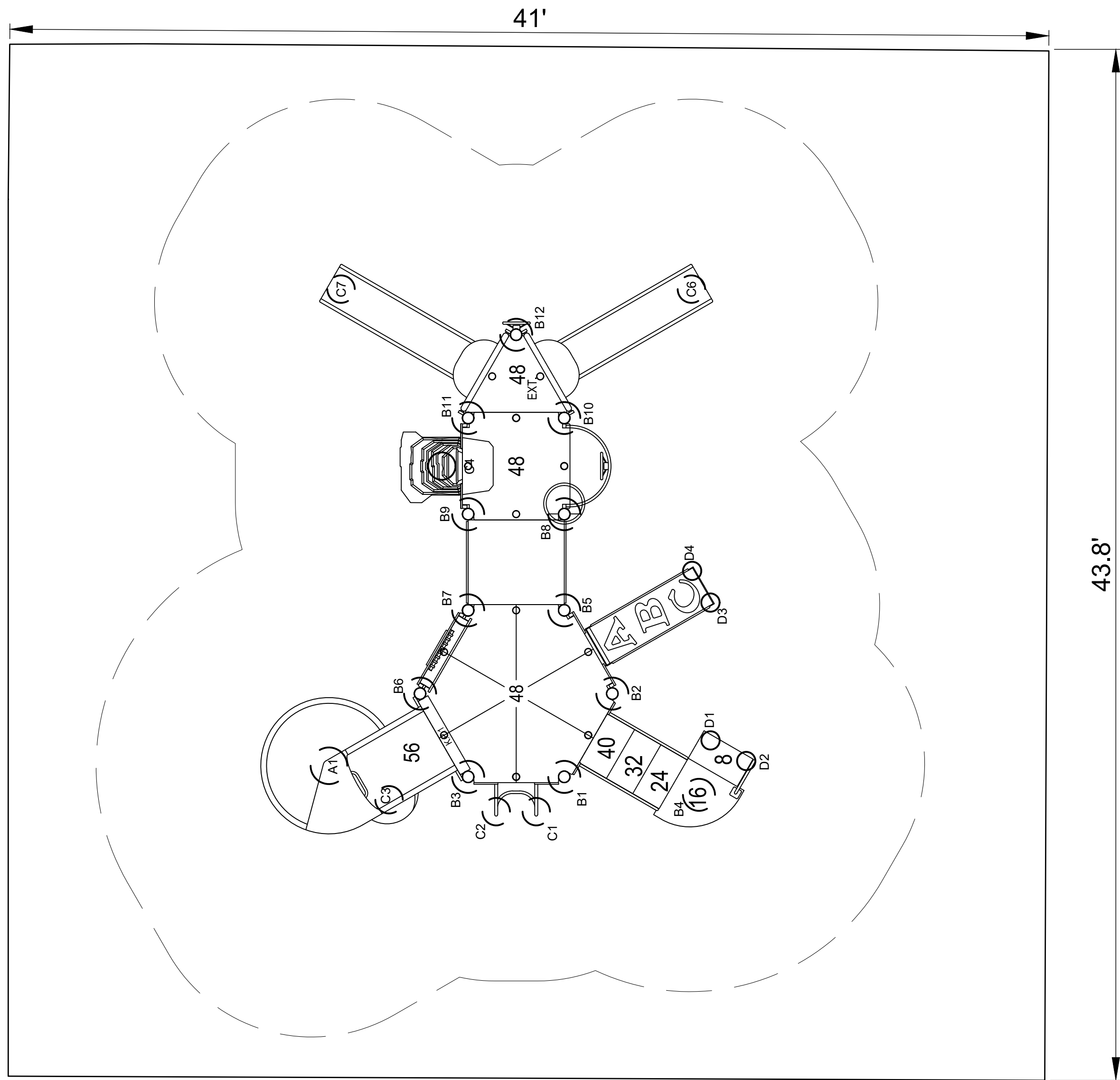
A050.00

Sheets in Contract Set:
06 of 09

Sheets in DOB Set:
05 of 06



1 PLAY EQUIPMENT RENDERINGS
N.T.S.



NOTE:
1. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS AND MANUFACTURER'S FULL SCHEDULE OF COLOR FOR ENGINEER'S SELECTION AND APPROVAL. COLORS SHALL BE CHOSEN BY SCHOOL.

2 PLAY EQUIPMENT LAYOUT DETAIL
N.T.S.

ADA COMPLIANCE NOTES:

AGE GROUP: 2 - 5

TOTAL ELEVATED PLAY COMPONENTS 12

TOTAL ELEVATED COMPONENTS ACCESSIBLE BY RAMP 0

TOTAL ELEVATED COMPONENTS ACCESSIBLE BY TRANSFER 11

TOTAL ACCESSIBLE GROUND LEVEL COMPONENTS SHOWN 10

TOTAL DIFFERENT TYPES OF GROUND LEVEL COMPONENTS 7

REQUIRED 0

REQUIRED 6

REQUIRED 4

REQUIRED 7

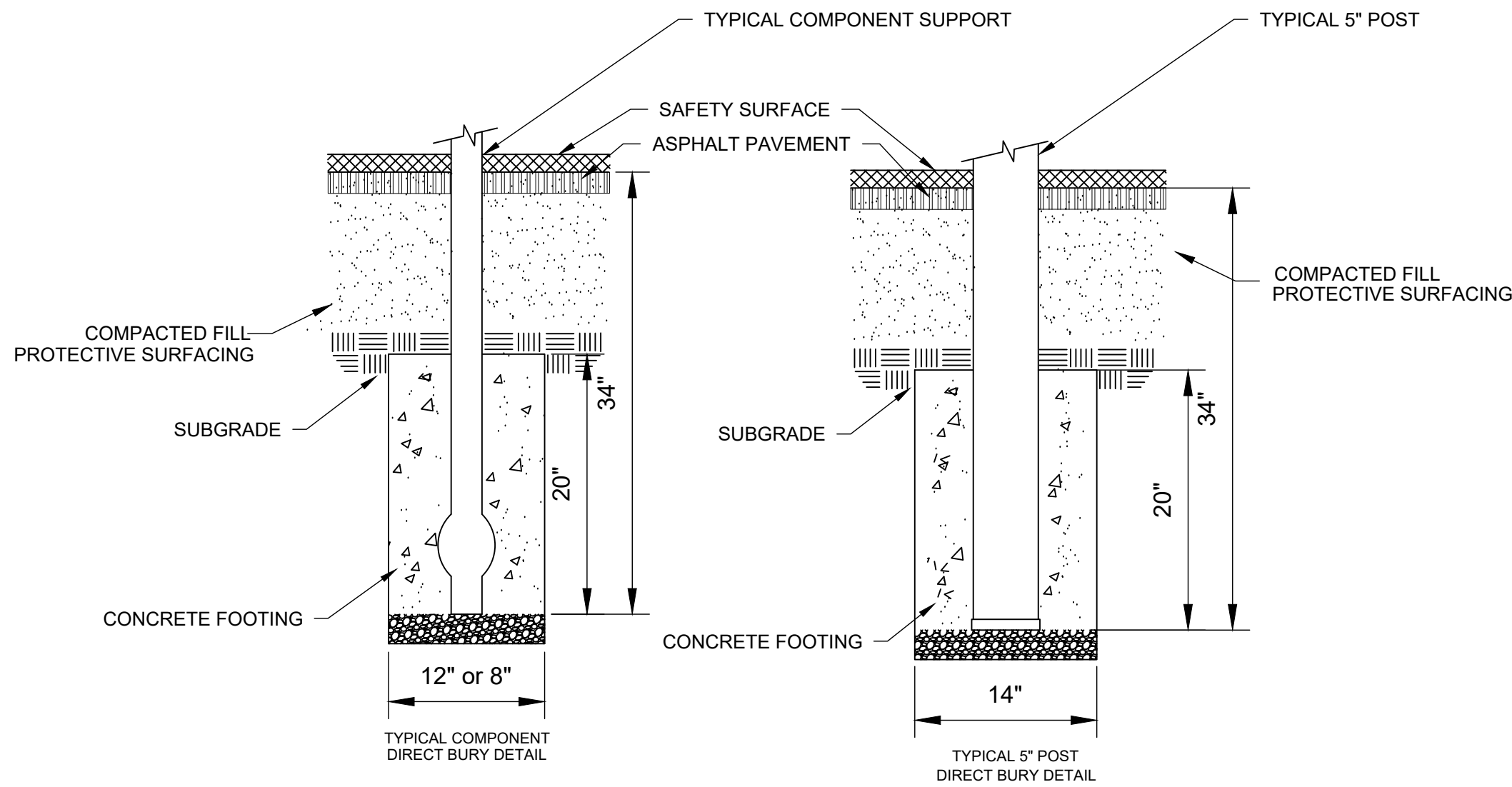
MODEL	DESCRIPTION	QTY
114373A	BELT BRIDGE (42")	1
152431A	ABC CLIMBER 48"DK DB	1
128252A	LOOP LADDER 48"DK DB	1
153076A	MINI SUMMIT CLIMBER 48"DK DB	1
OP000267A	DTR PB STEERING WHEEL POST MOUNT	1
184354C	CURVED TRANSFER MODULE RIGHT 2-SYRS 48"	1
178710A	HEXAGON TENDERDECK	1
121948A	KICK PLATE 8" RISE	1
111228A	SQUARE TENDERDECK	1
119646A	TRI-DECK EXTENSION	1
111240B	BALCONY DECK W/ WHEEL	1
115230B	TRACING PANEL GROUND LEVEL	1
173565A	XYLOFUN PANEL ABOVE DECK	1
166809A	E-POD SEAT	1
111404D	124" ALUM POST DB	9
111404C	132" ALUM POST DB	2
123337A	SINGLE SLIDE 48"DK DB	2
122033D	SPYROSLIDE 56" W/ HANGER BRACKET	1
182503A	WELCOME SIGN	1

3 PLAY EQUIPMENT LIST
N.T.S.

N.	I.D.	X (ft-in)	Y (ft-in)	Dist. to O	DIA (in)
1	A1	5"	8'-7"	8'-7"	16
2	B1	0"	0"	0"	14
3	B2	3'-0 1/2"	-1'-9"	3'-6"	14
4	B3	0"	3'-6"	3'-6"	14
5	B4	-8"	-4'-11"	4'-11 1/2"	14
6	B5	6'-1"	0"	6'-1"	14
7	B6	3'-0 1/2"	5'-3"	6'-0 1/2"	14
8	B7	6'-1"	3'-6"	7"	14
9	B8	9'-6 1/2"	0"	9'-6 1/2"	14
10	B9	9'-6 1/2"	3'-6"	10'-2"	14
11	B10	13'-0 1/2"	0"	13'-0 1/2"	14
12	B11	13'-0 1/2"	3'-6"	13'-6 1/2"	14
13	B12	16'-1"	1'-9"	16'-2 1/2"	14
14	C1	-1'-3"	1'-0 1/2"	1'-7 1/2"	12
15	C2	-1'-3"	2'-6"	2'-9 1/2"	12
16	C3	-10"	6'-4 1/2"	6'-5"	12
17	C4	11'-3 1/2"	4'-5 1/2"	12'-2"	12
18	C5	-9'-5"	-10'-11"	14'-5"	12
19	C6	17'-9"	-4'-7 1/2"	18'-4"	12
20	C7	17'-9"	8'-1 1/2"	19'-6 1/2"	12
21	D1	1'-4"	-5'-4"	5'-6"	8
22	D2	7"	-6'-7 1/2"	6'-8"	8
23	D3	6'-4"	-5'-4"	8'-3 1/2"	8
24	D4	7'-6"	-4'-8"	8'-10"	8

NOTE:
1. FOOTING CHART FOR PLANNING ONLY, NOT FOR CONSTRUCTION

4 FOOTING SCHEDULE
N.T.S.



FOOTING NOTES:
1. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS FOR ENGINEER REVIEW AND APPROVAL WITH FOOTING LAYOUT.
2. SOME EQUIPMENT LEGS MAY NOT REACH TO BOTTOM OF FOOTINGS.
3. ALLOW FOR BLOCK THICKNESS BY INCREASING FOOTING DEPTH WHEN APPLICABLE.
4. CONTRACTOR TO ENSURE THAT POST IS PLUMB PRIOR TO POURING CONCRETE.
5. PER MANUFACTURER, FOOTING AND POST LOCATIONS TO BE DETERMINED ON-SITE DURING CONSTRUCTION.

5 DECK AND COMPONENT FOOTING DETAIL
N.T.S.

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Aileen del Prado, P.E. LEED AP BD+C, Senior Director

In-House Design Studio
Maria A. Gómez, P.E., LEED A.P. BD+C, Senior Director

Consultants:



AKRF, Inc.
440 Park Avenue South
New York, NY 10016
Tel: 212-696-0670
Fax: 212-726-0942

Preliminary
Not For Construction

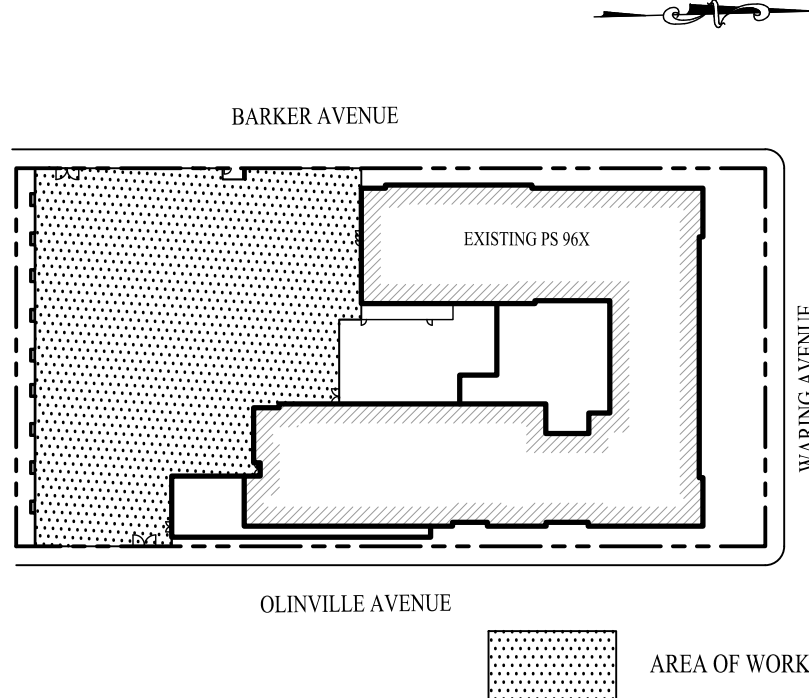
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10/14/2022 90% IEH SUBMISSION

No. Date Revision

Key Plan:



Block # 4341

Lot # 13

SCA Design Manager: LISA MANN, R.A., LEED AP BD+C, CPHD

Project Architect/Engineer: ROBERT CARAVELLA, P.E.

Discipline Lead: ROBERT CARAVELLA, P.E.

Designer: SARAH CARLTON

Drawn by: MOLLY HOGAN

Checked by: TIMOTHY M. LAVIN, P.E.

Design No:

D021488

Building ID:

X096

Date:

10/14/2022

Project:
PS 96 - BRONX
FY22 RESO A PLAYGROUND UPGRADE

Address:
2385 OLINVILLE AVENUE
BRONX, NY 10467

Drawing Title:

DETAILS II

Drawing No.:

A051.00

Sheets in Contract Set:
07 of 09

Sheets in DOB Set:
06 of 06

APPENDIX A
COMMUNITY AIR MONITORING PLAN

COMMUNITY AIR MONITORING PLAN

In accordance with the Excavation Work Plan (EWP), this Community Air Monitoring Plan (CAMP) was developed to describe the procedures for real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of the designated work area at the Site during ground intrusive work activities at 650 Waring Avenue, Bronx, New York (referred to as the “Site”). 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 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 do not spread contamination off-site through the air.

Community Air Monitoring Plan

Real-time air monitoring for VOCs and observations of particulate levels at the perimeter of the work areas will be completed during intrusive activities. Continuous monitoring and observations will be required during soil excavation activities. The downwind location will be just inside the fence line at the edge of the property.

VOC Monitoring, Response Levels, and Actions

VOCs will be monitored at the downwind perimeter of each designated work area on a continuous basis. Upwind concentrations will be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work will be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment will be calibrated daily. The equipment will 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 exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities will be temporarily halted and monitoring will continue. 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 persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities will be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring will continue. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the work area 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 will be recorded and will be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes will also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations will be monitored continuously at the upwind and downwind locations of the borings at temporary particulate monitoring stations. The particulate monitoring will 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 will be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration will be visually assessed during all work activities.

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques will be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed $150 \mu\text{g}/\text{m}^3$ 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 $150 \mu\text{g}/\text{m}^3$ above the upwind level, work will be stopped and a re-evaluation of activities will be initiated. Work will be able to be resumed provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within $150 \mu\text{g}/\text{m}^3$ of the upwind level and in preventing visible dust migration.
3. All readings will be recorded and be available for State (NYSDEC and NYSDOH) personnel to review.

ODOR MONITORING AND MITIGATION PLAN

The purpose of this Odor Monitoring and Mitigation Plan is to detail the monitoring and, if necessary, mitigation of odor potentially generated during implementation of the EWP. However, work activities will be performed to minimize the potential for generation of odor.

Odor Monitoring

Odor will be monitored within the work area and at the perimeter CAMP stations. If nuisance odors are identified at the Site boundary, or if odor complaints are received, work will be halted and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. NYSDEC and NYSDOH will be notified of all odor events and of any other complaints about the project. Odor or dust complaints from any owner or occupant of an adjacent or nearby property will be immediately addressed and managed by the Environmental Monitor in a manner equivalent to an exceedance of an air monitoring action level.

Odor Mitigation

All necessary means will be employed to prevent on- and off-Site nuisances. These measures may include: containerizing drill cuttings immediately and using tarps to cover exposed odorous soil (if encountered). Stockpiles will be inspected at a minimum once each week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the Site and available for inspection by NYSDEC.

Stockpiles will be kept covered at all times with appropriately anchored tarps, except when materials are being removed or added, and during stockpile sampling. Stockpiles will be routinely inspected and damaged tarp covers will be promptly replaced.

Soil stockpiles will be continuously encircled with silt fences. Hay bales will be used as needed near catch basins, surface waters and other discharge points.

If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: use of chemical odorants in spray or misting systems; and, use of staff to monitor odors in surrounding neighborhoods. It is anticipated that any nuisance odors developed during intrusive work can be corrected, without the use of a temporary containment structure equipped with appropriate air venting/filtering systems.

QUALITY ASSURANCE PROJECT PLAN

This Quality Assurance Project Plan (QAPP) presents the organization, objectives, planned activities, and specific quality assurance/quality control (QA/QC) procedures associated with the field activities described in the scope of work. The QAPP also describes specific protocols for field sampling, sample handling and storage, and laboratory analysis. The data generated from the analysis of samples will be used to evaluate post-excavation soil conditions.

Project Organization and Responsibility

A qualified person will coordinate and manage the sampling and analysis program, data reduction, QA/QC, data validation, analysis, and reporting. TRC will direct the sampling activities and coordinate laboratory and excavation activities. Data validation will be performed by Environmental Data Services, Inc. (EDS) of Virginia Beach, VA. Specifically, the third-party data validator will be Nancy Weaver of EDS. The TRC Project Quality Assurance (QA) Officer will be Elizabeth Denly and will report directly to the Project Manager, Bob Bowden (refer to **Attachment C** for resumes).

A qualified person will ensure that the QAPP is implemented and will oversee data validation. A qualified person will provide oversight and technical support for the sampling and analytical procedures followed in this project. This individual has the broad authority to approve or disapprove project plans, specific analyses, and final reports. The Project QA Officer is independent from the data generation activities. In general, the QA officer will be responsible for reviewing and advising on all QA/QC aspects of this program.

Laboratories used will be New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP)-certified laboratories. Specifically, the ELAP-certified laboratory TestAmerica Laboratories, Inc. (TestAmerica) will be used for this Excavation Work Plan. The laboratory will communicate directly with the Project Manager regarding the analytical results and reporting and will be responsible for providing all labels, sample containers, trip blanks, temperature blanks, shipping coolers, and laboratory documentation.

QA Objectives for Data Management

New York State Analytical Services Protocol (ASP) Category B laboratory packages will be provided by the laboratory.

All analytical measurements will be made so that the results are representative of the media sampled and the conditions measured. Data will be reported in consistent dry weight units for solid samples (i.e., $\mu\text{g/kg}$ and/or mg/kg). Tables 1 present the proposed samples, sampling and analytical parameters, analytical methods, sample preservation requirements, containers, and QA/QC samples.

Quantitation Limits (QLs) are laboratory-specific and reflect those values achievable by the laboratory performing the analyses.

Data Quality Levels (DQLs) are those reporting limits required to meet the objectives of the program (i.e., program action levels, cleanup standards, etc.).

Data Quality Objectives (DQOs) define the quality of data and documentation required to support decisions made in the various phases of the data collection activities. The DQOs are dependent on the end

EXCAVATION WORK PLAN – APPENDIX B
650 WARING AVENUE SITE; C203068
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uses of the data to be collected and are also expressed in terms of objectives for precision, accuracy, representativeness, completeness, and comparability.

The analytical methods to be used at this site provide the highest level of data quality and can be used for purposes of site assessment. However, in order to ensure that the analytical methodologies are capable of achieving the DQOs, measurement performance criteria have been set for the analytical measurements in terms of accuracy and precision.

The overall QA objective is to develop and implement procedures for field sampling, chain-of-custody, laboratory analysis, and reporting which will provide results that are scientifically valid, and the levels of which are sufficient to meet DQOs.

For quantitation limits for parameters associated with soil samples, the laboratory will be required to attempt to meet or surpass the parameter-specific limits listed in 6 NYCRR Part 375 Unrestricted Use Criteria and Commissioner Policy 51 Tables 2 and 3 (CP-51).

The QA objectives are defined as follows:

- **Accuracy** is the closeness of agreement between an observed value and an accepted reference value. The difference between the observed value and the reference value includes components of both systematic error (bias) and random error.

Accuracy in the field is assessed through the adherence to all field instrument calibration procedures, sample handling, preservation, and holding time requirements, and through the collection of equipment blanks prior to the collection of samples for each type of equipment being.

The laboratory will assess the overall accuracy of their instruments and analytical methods (independent of sample or matrix effects) through the measurement of “standards,” materials of accepted reference value. Accuracy will vary from analysis to analysis because of individual sample and matrix effects. In an individual analysis, accuracy will be measured in terms of blank results, the percent recovery (%R) of surrogate compounds in organic analyses and/or laboratory control samples (LCSs). This gives an indication of expected recovery for analytes tending to behave chemically like the spiked or surrogate compounds. Tables 2A and 2B summarize the laboratory accuracy requirements.

- **Precision** is the agreement among a set of replicate measurements without consideration of the “true” or accurate value: i.e., variability between measurements of the same material for the same analyte. Precision is measured in a variety of ways including statistically, such as calculating variance or standard deviation.

Precision in the field is assessed through the collection and measurement of field duplicates (one extra sample in addition to the original field sample). Field duplicates will be collected at a frequency of one per twenty investigative soil samples per analytical parameter. Precision will be measured through the calculation of relative percent differences (RPDs). The resulting information will be used to assess sampling and analytical variability. These criteria apply only if the sample and/or duplicate results are >5x the quantitation limit; if both results are < 5x the quantitation limit, the criterion will be doubled.

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Precision in the laboratory is assessed through the calculation of RPD for duplicate samples. For organic soil analyses, laboratory precision will be assessed through the analysis of field duplicates.

- ***Completeness*** is a measure of the amount of valid data obtained from a measurement system compared to the amount that was expected to be obtained under normal conditions. “Normal conditions” are defined as the conditions expected if the sampling plan was implemented as planned.

Field completeness is a measure of the amount of (1) valid measurements obtained from all the measurements taken in the project and (2) valid samples collected. The field completeness objective is greater than 90 percent.

Laboratory completeness is a measure of the amount of valid measurements obtained from all valid samples submitted to the laboratory. The laboratory completeness objective is greater than 95 percent.

- ***Representativeness*** is a qualitative parameter that expresses the degree to which data accurately and precisely represents either a characteristic of a population, parameter variations at a sampling point, a process condition, or an environmental condition within a defined spatial and/or temporal boundary. To ensure representativeness, the sampling locations have been selected to provide coverage over a wide area and to highlight potential trends in the data. In addition, field duplicate samples will provide an additional measure of representativeness at a given location.

Representativeness is dependent upon the proper design of the sampling program and will be satisfied by ensuring that the Excavation Work Plan (Work Plan) are followed and that proper sampling, sample handling, and sample preservation techniques are used.

Representativeness in the laboratory is ensured by using the proper analytical procedures, appropriate methods, and meeting sample holding times.

- ***Comparability*** expresses the confidence with which one data set can be compared to another. Comparability is dependent upon the proper design of the sampling program and will be satisfied by ensuring that the Work Plan are followed and that proper sampling techniques are used. Maximization of comparability with previous data sets is expected because the sampling design and field protocols are consistent with those previously used.

Comparability is dependent on the use of recognized United States Environmental Protection Agency (USEPA) or equivalent analytical methods and the reporting of data in standardized units. Laboratory procedures are consistent with those used for previous sampling efforts.

EXCAVATION WORK PLAN – APPENDIX B
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Table 1 Analytical Parameters, Methods, Preservation, Holding Time, and Container Requirements for Soil Samples								
Sample Matrix	Analytical Parameter	Sample Type¹	No. of Samples²	No. of QA/QC Samples	EPA Analytical Method	Sample Preservation	Holding Time³	Sample Container
Soil	TCL and CP-51 VOCs	Grab	2	Trip Blank ³ : as necessary (one per day, per cooler containing VOC soil samples) Duplicate: 1/20 Equipment Blank: 1/20	8260D	Sealed in EnCore® bag; Cool to 4° C	48 hours to extract: 2 EnCore® samplers extruded in 5 mL DI water and freeze vials to <-7° C; 1 EnCore® sampler extruded in 5 mL methanol and Cool to 40 C; 14 days to analysis	3 x 5 gram EnCore® samplers
Soil	TCL and CP-51 SVOCs	Grab	2	Duplicate: 1/20 Equipment Blank: 1/20	8270E	Cool to 4° C	14 days to extract	8 oz glass jar
Soil	TAL Metals	Grab	2	Duplicate: 1/20 Equipment Blank: 1/20	6020B	Cool to 4° C	Other metals: 180 days to analysis	8 oz glass jar
Soil	Mercury	Grab	2	Duplicate: 1/20 Equipment Blank: 1/20	7471B	Cool to 4° C	Mercury: 28 days to analysis	8 oz glass jar
Soil	Total Cyanide	Grab	2	Duplicate: 1/20 Equipment Blank: 1/20	SW 846 or 9012B	Cool to 4° C	14 days to extract	8 oz glass jar
Soil	TCL Pesticides	Grab	2	Duplicate: 1/20 Equipment Blank: 1/20	8081B	Cool to 4° C	14 days to extract	8 oz glass jar
Soil	TCL Herbicides	Grab	2	Duplicate: 1/20 Equipment Blank: 1/20	8151A	Cool to 4° C	14 days to extract	8 oz glass jar

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Soil	PCBs	Grab	2	Duplicate: 1/day or 1/20 Equipment Blank: 1/20	8082A	Cool to 4° C	14 days to extract	8 oz glass jar
Soil	1,4-Dioxane ⁴	Grab	2	Duplicate: 1/day Equipment Blank: 1/day	8270E	Cool to 4° C	14 days to extract	8 oz glass jar
Soil	PFAS ⁵	Grab	2	Duplicate: 1/day Equipment Blank: 1/day	1633	Cool to 4° C	14 days to extract	500 mL plastic HDPE jar

¹ A six-inch sampling interval is the targeted sample size; however, sample volume recovery, analytical method requirements, and field conditions can affect the actual sample interval size. For these reasons, the actual sampling interval may change in order to obtain adequate volume.

² Actual number of samples may vary depending on field conditions, sample material availability, and field observations.

³ From date and time of sample collection

⁴ The reporting limit for 1,4-dioxane is 0.5 ug/kg

⁵ Select list of 40 PFAS as per EPA Method 1633. NYSDEC Guidance included as **Attachment D**

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Table 2
Laboratory Data Quality Objectives: Precision and Accuracy: Soil Samples

Parameter	Method	Matrix	Accuracy Control Limits	Accuracy Frequency Requirements	Precision (RPD) Control Limits	Precision Frequency Requirements
TCL and CP-51 VOCs	8260D	Soil	<u>Surrogates</u> % Rec. 1,2-Dichloroethane-d4 77-145 4-Bromofluorobenzene 70-139 Toluene-d8 80-120 Dibromfluoromethane 48-150	<u>Surrogates:</u> All samples, standards, QC samples	<u>Field Duplicates</u> RPD ≤50	<u>Field Duplicates:</u> One per 20 soil samples

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TCL and CP-51 SVOCs	8270E	Soil	<u>Surrogates</u> <u>% Rec.</u> 2-Fluorophenol 10-105 Phenol-d5 15-100 2,4,6-Tribromophenol 10-123 Nitrobenzene-d5 11-104 2-Fluorobiphenyl 14-103 Terphenyl-d14 12-126	<u>Surrogates:</u> All samples, standards, QC samples	<u>Field Duplicates</u> RPD ≤50	<u>Field Duplicates:</u> One per 20 soil samples
TAL Metals	6020B	Soil	<u>Matrix Spikes:</u> 75-125% recovery <u>Laboratory Control Samples:</u> 80-120% recovery	<u>Matrix Spikes:</u> One per 20 soil samples per laboratory analytical batch <u>Laboratory Control Samples:</u> One per 20 samples per laboratory analytical batch	<u>Field Duplicates</u> RPD ≤20	<u>Field Duplicates:</u> One per 20 soil samples
Mercury	7471B	Soil	<u>Matrix Spikes:</u> 75-125% recovery <u>Laboratory Control Samples:</u> 80-120% recovery	<u>Matrix Spikes:</u> One per 20 soil samples per laboratory analytical batch <u>Laboratory Control Samples:</u> One per 20 samples per laboratory analytical batch	<u>Field Duplicates</u> RPD ≤20	<u>Field Duplicates:</u> One per 20 soil samples
Total Cyanide	SW 846 or 9012B	Soil	<u>Matrix Spikes:</u> 11-108% recovery <u>Laboratory Control Samples:</u> 85-115% recovery	<u>Matrix Spikes:</u> One per 20 soil samples per laboratory analytical batch <u>Laboratory Control Samples:</u> One per 20 samples per laboratory analytical batch	<u>Field Duplicates</u> RPD ≤20	<u>Field Duplicates:</u> One per 20 soil samples
TCL Pesticides	8081B	Soil	<u>Matrix Spikes:</u> 49-150% recovery <u>Laboratory Control Samples:</u> 49-150% recovery	<u>Matrix Spikes:</u> One per 20 soil samples per laboratory analytical batch <u>Laboratory Control Samples:</u> One per 20 samples per laboratory analytical batch	<u>Field Duplicates</u> RPD ≤20	<u>Field Duplicates:</u> One per 20 soil samples

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TCL Herbicides	8151A	Soil	<u>Matrix Spikes:</u> 50-150% recovery <u>Laboratory Control Samples:</u> 50-150% recovery	<u>Matrix Spikes:</u> One per 20 soil samples per laboratory analytical batch <u>Laboratory Control Samples:</u> One per 20 samples per laboratory analytical batch	<u>Field Duplicates:</u> RPD ≤20	<u>Field Duplicates:</u> One per 20 soil samples
PCBs	8082A	Soil	<u>Matrix Spikes:</u> 65-150% recovery <u>Laboratory Control Samples:</u> 65-150% recovery	<u>Matrix Spikes:</u> One per 20 soil samples per laboratory analytical batch <u>Laboratory Control Samples:</u> One per 20 samples per laboratory analytical batch	<u>Field Duplicates:</u> RPD ≤20	<u>Field Duplicates:</u> One per 20 soil samples
1,4-Dioxane	8270D SIM	Soil	<u>Matrix Spikes</u> 70-130% recovery	<u>Matrix Spikes:</u> One per 20 soil samples per laboratory analytical batch <u>Laboratory Control Samples:</u> One per 20 samples per laboratory analytical batch	<u>Field Duplicates:</u> RPD ≤20	<u>Field Duplicates:</u> One per day or one per 20 soil samples, whichever is more frequent
PFAS	1633	Soil	<u>Matrix Spikes:</u> 75-125% recovery <u>Laboratory Control Samples:</u> 80-120% recovery	<u>Matrix Spikes:</u> One per day or one per 20 soil samples per laboratory analytical batch <u>Laboratory Control Samples:</u> One per 20 samples per laboratory analytical batch	<u>Field Duplicates:</u> RPD ≤20	<u>Field Duplicates:</u> One per day or one per 20 soil samples, whichever is more frequent

Project Goals

The principal objective of the Excavation Work Plan is to document soil conditions following footing excavation activities.

Project Scope

The scope of work includes the removal and off-Site disposal of soil; installation of support of excavation (SOE) system, dewatering of the excavation, collection and laboratory analysis of post-excavation confirmatory endpoint soil samples, and backfilling of select portions of the excavation.

Endpoint soil samples will be collected in accordance with DER-10 and analyzed for the full suite of Target Analyte List (TAL) metals, Target Compound List (TCL)/ CP-51 volatiles, TCL/CP-51 semi-volatiles, TCL pesticides/herbicides, PCBs, mercury, total cyanide, 1,4-dioxane, and PFAS.

Sampling Plan

Environmental sampling will include soil samples collected using disposable sampling equipment following excavation. The proposed post-excavation soil sampling plan has been attached as **Figure 1**.

Soil Sampling

With the exception of soil collected for VOC analysis, the samples will be collected with a disposable scoop and placed in the sample bottles. New glass sample bottles with HDPE-lined plastic lids will be used. EnCore® samplers (or similar) will be used to collect soil samples for VOC analysis. Samplers will wear phthalate-free gloves such as nitrile (no latex will be used). Only clean instruments will be allowed to touch the sample. Soil samples will be screened for VOCs with a PID and observed for visual and olfactory signs of contamination. Samples will be collected for VOC analysis first using EnCore® samplers, then glass bottles will be filled via disposable scoop. Visible stone, gravel, vegetation, and fill (asphalt, concrete, ash, etc.) will be removed from soil prior to sampling. Samples will be labeled with required information and named in accordance with the post-excavation sampling plan. Glass bottles and EnCore® samplers will be filled completely, sealed tightly, packed in bags as needed, and put on ice immediately after sampling.

QC Sample Collection

QC samples for soil samples will include trip blanks for VOCs and field duplicates and equipment blanks. Refer to Table 1A for a summary of QC sample preservation and container requirements.

Trip blanks for soil will consist of distilled water (supplied by the laboratory) and will be used to assess the potential for volatile organic compound contamination of soil samples due to contaminant migration during sample shipment and storage. Trip blanks will be transported to the Site unopened, stored with the investigative samples, and kept closed until analyzed by the laboratory. Trip blanks will be submitted to the laboratory at a frequency of one per cooler that contains soil samples for analysis for VOCs.

Field duplicates are an additional aliquot of the same sample submitted for the same parameters as the original sample. Field duplicates will be used to assess the soil sampling and analytical reproducibility. Field duplicates will be collected by alternately filling sample bottles from the source being sampled. Field duplicates will be submitted at a frequency of one per 20 samples for all parameters of soil analysis. Refer to Table 1A for a summary of QC sample preservation and container requirements for soil samples.

Equipment blanks will consist of distilled water and will be used to check for potential contamination of the equipment, which may cause sample contamination. Equipment blanks will be collected by routing the

distilled water through the sampling equipment prior to soil sample collection. Equipment blank samples for emerging contaminants (PFAS and 1,4-dioxane) will be collected at a minimum frequency of one per day. Equipment blanks will be submitted to the laboratory at a frequency of one per 20 soil samples. Refer to Table 1A for a summary of QC sample preservation and container requirements for soil samples.

Sample Preservation and Containerization

The analytical laboratory will supply the containers for analytical samples. These containers will be cleaned by the manufacturer to meet or exceed all analyte specifications established in the latest USEPA's Specifications and Guidance for Contaminant-Free Sample Containers. Certificates of analysis are provided with each bottle lot and maintained on file to document conformance to USEPA specifications. Soil samples will be placed in chilled coolers immediately after collection.

Equipment Decontamination

Re-usable sampling equipment shall be cleaned between each use in the following manner:

- Wash and scrub with Alconox and water mixture
- Tap water rinse
- Wash and scrub with biodegradable degreaser ("ZEP") if there is oily residue on equipment surface.
- Tap water rinse
- Distilled/deionized water rinse
- Air dry

As noted above, special care should be taken when sampling for PFAS. TRC will implement TRC's SOP ECR-010 Equipment Decontamination for PFAS-specific decontamination protocols. TRC's Equipment Decontamination SOP is provided in Attachment A.

Field Custody Procedures

Sample chain-of-custody and packaging procedures are summarized below. These procedures are intended to ensure that the samples will arrive at the laboratory with the chain-of-custody intact.

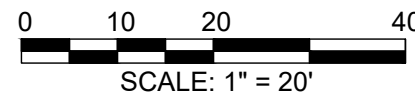
- The field sampler is personally responsible for the care and custody of the samples until they are transferred or dispatched properly. Field procedures have been designed such that as few people as possible will handle the samples.
- All bottles will be identified by the use of sample labels with sample numbers, sampling locations, date/time of sample collection, and type of analysis.
- Sample labels will be completed for each sample using waterproof ink unless prohibited by weather conditions. For example, a logbook notation would explain that a pencil was used to fill out the sample label because the pen would not function in wet weather.
- Samples will be accompanied by a properly completed chain-of-custody form. The sample numbers and locations will be listed on the chain-of-custody form. When transferring the possession of samples, the individuals relinquishing and receiving will sign, date, and note the time on the record. This record documents the transfer of custody of samples from the sampler to another person, to a mobile laboratory, to the permanent laboratory, or to/from a secure storage location. A Chain of Custody Form is provided in **Attachment B**.

- All shipments will be accompanied by the chain-of-custody record identifying the contents. The original record will accompany the shipment, and copies will be retained by the sampler and placed in the project files.
- Samples will be properly packaged for shipment and dispatched to the appropriate laboratory for analysis, with a separate signed custody record enclosed in and secured to the inside top of each sample box or cooler. Shipping containers will be secured with strapping tape and custody seals for shipment to the laboratory. The custody seals will be attached to the front right and back left of the cooler and covered with clear plastic tape after being signed by field personnel. The cooler will be strapped shut with strapping tape in at least two locations.
- If the samples are sent by common carrier, the air bill will be used. Air bills will be retained as part of the permanent documentation. Commercial carriers are not required to sign off on the custody forms since the custody forms will be sealed inside the sample cooler and the custody seals will remain intact.
- Samples remain in the custody of the sampler until transfer of custody is completed. This consists of delivery of samples to the laboratory sample custodian, and signature of the laboratory sample custodian on chain-of-custody document as receiving the samples and signature of sampler as relinquishing samples.

Data Management and Reporting

ASP Category B Laboratory Packages will undergo data validation. A NYSDEC Data Usability Summary Report (DUSR) will be prepared for each laboratory package. Sample analysis data will be submitted in NYSDEC EQUIS EDD format.

FIGURE 1
Proposed Post-Excavation Soil Sampling Plan

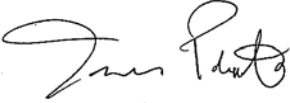



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ATTACHMENT A

Standard Operating Procedures – TRC and Eurofins/TestAmerica



Title: Equipment Decontamination		Procedure Number: ECR 010	
		Revision Number: 1	
		Effective Date: December 2016	
Authorization Signatures			
			
Technical Reviewer James Peronto	Date 12/15/16	ECR Practice Quality Coordinator Elizabeth Denly	Date 12/15/16

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ATTACHMENTS

Attachment A	SOP Fact Sheet
Attachment B	SOP Modifications for PFAS

1.0 INTRODUCTION

1.1 Scope & Applicability

This Standard Operating Procedure (SOP) was prepared to direct TRC personnel in the procedures needed for decontamination of equipment used in the field during environmental investigations (e.g., sediment, soil, groundwater investigations). Other state or federal requirements may be above and beyond the scope of this SOP and will be followed, if applicable. In all instances, the actual procedures used should be documented and described in the field notes. Preventing or minimizing potential cross-contamination of samples is important for the collection of representative samples, avoiding the possible introduction of sampling error into sample results, and for protecting the health and safety of site personnel.

Removing or neutralizing potential contaminants that may have accumulated on equipment and vehicles ensures protection of personnel, reduces or eliminates potential transfer of contaminants to clean areas, and minimizes the likelihood of sample cross-contamination.

The use of dedicated, disposable, new sampling equipment (e.g., disposable liners, plastic spoons, plastic or aluminum bowls) should be considered as an alternative to equipment decontamination and the subsequent generation of decontamination fluids.

1.2 Summary of Method

Equipment decontamination is used to remove potential contaminants from a sampling device or piece of field equipment prior to and between the collection of samples and is also used to limit personnel exposure to residual contamination that may be present on used field equipment.

Contaminants can be physically removed from equipment or deactivated by sterilization or disinfection. Gross contamination of equipment requires physical decontamination, including abrasive and nonabrasive methods. These include the use of brushes, air and wet blasting, and high-pressure water, followed by a wash/rinse process using appropriate cleaning solutions. A solvent rinse may be required when organic contamination is present, and an acid rinse may be required when metals are parameters of interest. Equipment decontamination procedures can vary depending on the media being sampled and the type of sampling equipment being used. Disposal of decontamination fluids will be handled on a project-specific basis and will be in accordance with all applicable regulations.

1.3 Equipment

The following equipment may be utilized when decontaminating equipment. Project-specific conditions or requirements may warrant the use of additional equipment or deletion of items from this list. For specialized sampling programs involving per- and polyfluorinated alkyl substances (PFAS), refer to Attachment B for further details.

- Appropriate level of personal protective equipment (PPE) as specified in the site-specific Health and Safety Plan (HASP)

- Alconox®, Liquinox® or other nonphosphate concentrated laboratory-grade soap
- Simple Green® or other nontoxic biodegradable cleaner
- Deionized, distilled, or organic-free water, as appropriate (may be supplied by the laboratory or purchased from commercial vendors depending on project requirements)
- Pump sprayer
- Pressure sprayer
- Squeeze bottle filled with pesticide-grade hexane (option for organic analyses)
- Squeeze bottle filled with pesticide-grade methanol (option for organic analyses)
- Squeeze bottle filled with pesticide-grade isopropanol (option for organic analyses)
- Squeeze bottle filled with 10 percent nitric acid (option for metals analyses and stainless-steel equipment)
- Squeeze bottle filled with 1 percent nitric acid (option for metals analyses)
- Container (squeeze bottle to 5-gallon bucket) filled with potable water and a nonphosphate, laboratory-grade soap (approximately 1 tablespoon of soap to 5 gallons of water)
- Extra quantities of above listed liquids
- Potable water
- Containers, such as buckets or wash basins (the type and number of containers is dependent on the procedure)
- Scrub brushes
- Small wire brush
- Aluminum foil
- Polyethylene sheeting
- A container for decontamination of pumps and associated tubing.

1.4 Health & Safety Considerations

TRC personnel will be on site when implementing this SOP. Therefore, TRC personnel shall follow the site-specific HASP. TRC personnel will use the appropriate level of PPE as defined in the HASP.

Samples containing chemical contaminants may be handled during implementation of this SOP. Certain decontamination fluids, including solvents and/or acids, are considered hazardous materials, and TRC employees will appropriately handle and store them at all times. Appropriately manage chemicals that pose specific toxicity or safety concerns, and follow any other relevant requirements as appropriate. Hazardous substances may be incompatible or may react to produce heat, chemical reactions, or toxic products. Some hazardous substances may be incompatible with clothing or equipment and can permeate or degrade protective clothing or equipment. Also, hazardous substances may pose a direct health hazard to workers through

inhalation or skin contact or if exposed to heat/flame and they combust. Safety data sheets for chemicals handled by TRC personnel should be maintained in a designated location at the project site.

1.5 Cautions and Potential Problems

Special care should be taken when decontaminating equipment used for sampling for PFAS. Please refer to Attachment B for details.

- The use of deionized, distilled or organic-free water commonly available from commercial vendors may be acceptable for decontamination of sampling equipment provided that it has been certified by the vendor as analyte-free and/or meets the project-specific requirements.
- Alconox®, Liquinox®, or other nonphosphate, concentrated, laboratory-grade soap may contain trace quantities of perchlorate.
- Avoid using an excessive amount of soap during decontamination procedures, as this could result in difficulty rinsing the soap residue off of the equipment. Typically the soap solution is prepared using 1 tablespoon of soap to 5 gallons of water.
- Use sufficient amount of decontamination fluid (e.g., acid or solvent rinses) so that the fluid flows over the equipment and runs off. Spraying the equipment with a minimal amount of decontamination fluid that does not run off is ineffective.
- Spent decontamination solutions are considered investigation-derived waste (IDW) and must be managed as directed by the site-specific field program. Project and regulatory requirements, chemical compatibility, ambient conditions and professional judgment should be used to determine the appropriate decontamination process with respect to combining and/or segregating decontamination fluids. Section 3 of this SOP provides more guidance on the disposal procedures.
- Several procedures can be established to minimize the potential for cross-contamination or analytical interference by decontamination fluids. For example:
 - The use of methanol in the decontamination procedure may not be appropriate if methanol is a contaminant of concern.
 - Isopropanol may be used as a substitute for methanol but may not be appropriate when collecting samples for volatile organic compound (VOC) analyses. Residual isopropanol on the equipment may cause substantial interferences in subsequent VOC analyses and may result in unnecessary dilutions and/or false positive results if isopropanol is not removed in subsequent decontamination steps. It should also be noted that the application of isopropanol to hot metal surfaces (e.g., a steam-cleaned split spoon) may cause oxidation of the isopropanol to acetone.

- If hexane is used in the decontamination procedure, caution should be used to ensure that the hexane is completely volatilized and the equipment is subsequently rinsed when samples are to be analyzed for VOCs and volatile petroleum hydrocarbons (VPH). Residual hexane on equipment could interfere with the VOC and VPH analyses and may result in unnecessary dilutions and/or false positive results.
 - Cover monitoring and sampling equipment with protective material (i.e., aluminum foil, polyethylene sheeting, or Ziploc® bags) to minimize potential re-contamination after decontamination.
 - Use disposable sampling equipment when appropriate to minimize the need for decontamination. Although disposable sampling tools are encouraged in order to minimize the generation of decontamination fluids, it should be noted that plastic tools may not be appropriate for collection of samples to be analyzed for semivolatile organic compounds (SVOCs), pesticides, and polychlorinated biphenyls (PCBs). Potential phthalate contamination may cause significant interferences in the subsequent analyses and may result in unnecessary dilutions and/or false positive results.
- After decontamination, equipment should be handled only by personnel wearing clean disposable powder-free nitrile gloves to prevent recontamination.
 - If equipment decontamination is performed in the field, the equipment should be moved away (preferably upwind) from the decontamination area to prevent recontamination.
 - Equipment that is not decontaminated properly may result in potentially high biased results in field samples. **Note:** Equipment blank collection may be appropriate after decontamination of equipment used to collect highly contaminated samples.

1.6 Personnel Qualifications

Since this SOP will be implemented at sites or in work areas that entail potential exposure to toxic chemicals or hazardous environments, all TRC personnel must be adequately trained. Project and client-specific training requirements for samplers and other personnel on site should be developed in project planning documents, such as the sampling plan or project work plan. These requirements may include:

- Occupational Safety and Health Administration (OSHA) 40-hour Health and Safety Training for Hazardous Waste Operations and Emergency Response (HAZWOPER) workers
- 8-hour annual HAZWOPER refresher training.

2.0 PROCEDURES

Refer to the site-specific sampling plan and/or Quality Assurance Project Plan (QAPP), if applicable, for site-specific procedures. Other state or federal requirements may be above and beyond the scope of this SOP and will be followed if applicable. In all instances, the actual procedures used should be documented and described in the field notes.

2.1 General

All personnel, sample containers, and equipment leaving the contaminated area of a site must be decontaminated. Various decontamination methods will either physically remove contaminants by abrasive and/or washing actions, inactivate contaminants by disinfection or sterilization, or both. Decontamination procedures should be documented in the field book.

2.2 Physical Decontamination Procedures

In many cases, gross contamination can be removed by physical means. The physical decontamination techniques appropriate for equipment decontamination can be grouped into two categories: abrasive methods and nonabrasive methods. In general, heavy equipment decontamination is conducted by drilling and construction subcontractors and not by TRC personnel. However, TRC personnel will typically need to document such decontamination efforts as part of project work.

ABRASIVE CLEANING METHODS APPROPRIATE FOR DRILLING EQUIPMENT (DRILLING RIGS, ETC.)

Abrasive cleaning methods involve rubbing and wearing away the top layer of the surface containing the contaminant. The following abrasive methods are available but are not commonly used:

- *Mechanical:* Mechanical cleaning methods use brushes of metal or nylon. The amount and type of contaminants removed will vary with the hardness of bristles, length of brushing time, and degree of brush contact.
- *Air Blasting:* Air blasting is used for cleaning large equipment, such as bulldozers, drilling rigs, or auger bits. The equipment used in air blasting employs compressed air to force abrasive material through a nozzle at high velocities. The distance between the nozzle and the surface cleaned, as well as the pressure of air, the time of application, and the angle at which the abrasive material strikes the surface, determines cleaning efficiency. Air blasting has several disadvantages, including it is unable to control the amount of materials removed, it can aerate contaminants, and it generates large amounts of waste.
- *Wet Blasting:* Wet blasting, also used to clean large equipment, involves use of a suspended fine abrasive delivered by compressed air to the contaminated area. The amount of materials removed can be carefully controlled by using very fine abrasives. One disadvantage of this method is the generation of a large amount of waste.

NONABRASIVE CLEANING METHODS APPROPRIATE FOR FIELD EQUIPMENT (DRILLING AUGERS AND RIGS, ETC.)

Nonabrasive cleaning methods involve forcing the contaminant off of a surface with pressure. In general, less of the equipment surface is removed using nonabrasive methods. Special care should be taken during decontamination procedures following sampling for PFAS. Please refer to Attachment B for details. The following non-abrasive methods are available:

- *High-pressure Potable Water:* This method consists of a high-pressure pump, an operator-controlled directional nozzle, and a high-pressure hose. Flow rates typically range from 20 to 140 liters per minute.

This procedure is used the majority of the time and is more appropriate for equipment with painted surfaces.

- *Ultrahigh-Pressure Potable Water:* This system produces a pressurized water jet. The ultrahigh-pressure spray removes tightly adhered surface film. The water velocity ranges from 500 meters per second (m/sec) to 900 m/sec. Additives can enhance the method. This method is not applicable for hand-held sampling equipment.

This procedure is not commonly used but would be appropriate for carbon steel drilling rods and augers.

2.3 Procedure for Sampling Equipment

Sampling equipment, such as split-spoon samplers, shovels, hand augers, trowels, spoons, spatulas, bailers, tethers, dippers, and pumps, will be cleaned using the following procedure. Special care should be taken during decontamination procedures following sampling for PFAS. Please refer to Attachment B for details. **Note:** The overall number of containers needed for collection of decontamination fluids may vary depending on chemical compatibilities, project and regulatory requirements, and ultimate disposal methods for these fluids.

1. Lay out sufficient polyethylene sheeting on the ground or floor to allow placement of the necessary number of containers (e.g., plastic wash basins or buckets) and an air drying area. The number of decontamination steps and designated containers should be determined prior to field sampling based on the site-specific sampling plan. At a minimum, one container should be designated for the detergent wash. A second container should be designated for water rinsing. A third container may be designated for nonwater rinsing. If more than one, the nonwater rinsate fluids may need to be separated. Nonwater rinsate fluids should not be combined with the detergent wash during decontamination. Place the containers on the polyethylene sheeting. The decontamination line should progress from “dirty” to “clean”.

Note: In instances where acid or solvent rinses are required, additional containers may be needed to manage collection and subsequent disposal of the spent decontamination fluids.

2. Fill the first container with potable water. Add sufficient nonphosphate concentrated laboratory-grade soap to cause suds to form in the container. Do not use an excessive amount of the soap (approximately 1 tablespoon of soap to 5 gallons of water), or rinsing the soap residue off of the equipment will be difficult.
3. Brush any visible dirt off of the sampling equipment into a designated area before getting equipment wet.

4. Using a clean, coarse scrub brush, submerge and wash the sampling equipment in the soap solution in the first container, removing all dirt or visible hydrocarbons. Allow excess soap to drain off the equipment into the container when finished. If cleaning a pump that is not completely disassembled, run the submerged pump in the container long enough to allow sufficient contact time with the internal components of the pump.
5. Rinse the equipment with potable water over an appropriate container, using a coarse scrub brush or pressure sprayer to aid in the rinse if necessary. If an additional acid or solvent rinse is not required, proceed to Step 8.
6. ****If sampling for metals and if required by the project, rinse the equipment with nitric acid over an appropriate container. Consider using a container dedicated to acidic solutions to minimize the volume of liquid that needs to be neutralized later. A 10 percent nitric acid solution is used on stainless steel equipment. A 1 percent nitric acid solution is used on all other equipment. If not required, this step may be omitted.**

Rinse the equipment over an appropriate container using deionized, distilled or organic-free water. If cleaning a pump that is not completely disassembled, run the submerged pump in the container long enough to allow sufficient contact time with the internal components of the pump.

7. ****If sampling for organic parameters and if required by the project, rinse the equipment over an appropriate container using pesticide-grade methanol or isopropanol (see Cautions and Potential Problems). If oily, a pesticide-grade hexane rinse should follow the methanol/isopropanol rinse, or as an alternative, Simple Green® can be used if approved by the Project Manager. Consider using an appropriate container dedicated to volatile solvents to minimize the volume of liquid that subsequently needs to be managed as IDW. If not required, this step may be omitted.**

Allow the equipment to completely air dry prior to proceeding to the next step.

**** Steps 6 and 7 are optional and may be used on a site-specific basis. The site-specific sampling plan or QAPP, if available, should be consulted. In the absence of a sampling plan or QAPP, the Project Manager will decide upon the necessity of these steps.**

8. Rinse the equipment over an appropriate container using deionized, distilled or organic-free water. If cleaning a pump that is not completely disassembled, run the submerged pump in the container long enough to allow sufficient contact time with the internal components of the pump.
9. Allow the equipment to completely air dry on a clean surface (e.g., polyethylene sheeting or a clean container) (See*NOTE).

***NOTE** that if temperature or humidity conditions preclude air drying equipment, sufficient spares, if possible, should be available so that no item of sampling equipment need be used more than once. If an ample amount of spare equipment is not available and the equipment will not completely air dry, additional rinses with deionized, distilled or organic-free water

should be used. The inability of equipment to air dry and the usage of additional rinses should be recorded in the field book or on the appropriate form.

10. Reassemble equipment, if necessary, and wrap completely in clean, unused, protective material. Reuse of equipment on the same day without wrapping in protective material is acceptable.
11. Spent decontamination fluids are considered IDW and must be managed as directed by the site-specific field program.
12. Record the decontamination procedure in the field book or on the appropriate form.

2.4 Procedure for Measuring Equipment

Measuring equipment, such as pressure transducers, water level indicators, oil/water interface probes, and soil moisture/pH meters will be cleaned using the following procedure, unless it conflicts with the manufacturer's recommendations. Special care should be taken during decontamination procedures following sampling for PFAS. Please refer to Attachment B for details.

1. Fill two clean containers (e.g., plastic wash basins or buckets) with potable water.
2. Add sufficient nonphosphate concentrated laboratory-grade soap to one container to form a thin layer of soap suds. If oily residues are apparent, the use of Simple Green® may be required.
3. Brush any visible dirt off of the measuring equipment before getting the equipment wet.
4. Either spray rinse the device with the soap solution over the first container, or for heavily soiled equipment, immerse the device in the container containing soap and gently agitate. Scrub device if it is soiled. Do not submerge any electrical controls or take-up reels. Submerge only that portion of the device that came in contact with potential contaminants.
5. Immerse the device in the container containing the potable water and gently agitate. Do not submerge any electrical connectors or take-up reels. Submerge only that portion of the device that came in contact with potential contaminants.
6. Spray rinse equipment with deionized, distilled, or organic-free water over the last container used.
7. Allow the equipment to air dry if time allows.
8. Record the decontamination procedure in the field book or on the appropriate form.

3.0 INVESTIGATION-DERIVED WASTE DISPOSAL

Field personnel should discuss specific documentation and containerization requirements for IDW disposal with the Project Manager.

Each project must consider IDW disposal methods and have a plan in place prior to performing the field work. Provisions must be in place regarding what will be done with IDW. If IDW cannot be returned to the site, consider material containment, such as a composite drum, proper labeling, on-site storage by the client, testing for disposal approval of the materials, and ultimately the pickup and disposal of the materials by appropriately licensed vendors.

4.0 QUALITY ASSURANCE/QUALITY CONTROL

One type of quality control sample specific to the field decontamination process is the equipment blank. The equipment blank provides information about the effectiveness of the decontamination process employed in the field. An equipment blank can detect contamination that may arise from potentially contaminated equipment or equipment that has not been decontaminated effectively.

Equipment blanks consist of a sample of analyte-free (i.e., deionized, distilled, organic-free) water that is poured over and through a decontaminated sampling device and placed in a clean sample container. Ideally, the reagent water should come from the laboratory and be certified as clean. If the blank water is not certified as clean and/or not supplied by the laboratory performing the analyses, a separate water blank that has not run through the sampling equipment should also be sent to the laboratory for analysis.

Equipment blanks are typically collected for all parameters of interest at a minimum rate of 1 per 20 samples for each parameter. The frequency of equipment blank collection will vary from project to project, depending upon the data quality objectives, and will be specified in either the site-specific sampling plan or QAPP. Equipment blanks are typically not required if dedicated sampling equipment is used.

5.0 DATA MANAGEMENT AND RECORDS MANAGEMENT

All reagents used must be documented in the field book or on the appropriate form. Any deviations from the decontamination procedures specified in the sampling plan or QAPP must be approved by the Quality Assurance (QA) Officer and Project Manager and documented in the field book. The lot number and vendor of each reagent used should be documented in the field book. Refer to RMD SOP 001 for field documentation procedures.

6.0 REFERENCES

USEPA. December 1987. *A Compendium of Superfund Field Operations Methods*. EPA/540/P-87/001.

USEPA. January 1991. *Compendium of ERT Groundwater Sampling Procedures*. OSWER Directive 9360.4-06. PB91-9211275.

USEPA. November 1992. *RCRA Ground-Water Monitoring: Draft Technical Guidance*. EPA/530-R-93-001. USEPA Office of Solid Waste.

USEPA. January 1999. *Compendium of ERT Groundwater Sampling Procedures*. EPA/540/P-91/007. OSWER Directive 9360.4-06. PB91-921275.

USEPA. December 20, 2011. *Field Equipment Cleaning and Decontamination*. SESDPROC-205-R2. Region 4. Science and Ecosystems Support Division. Athens, Georgia.

7.0 SOP REVISION HISTORY

REVISION NUMBER	REVISION DATE	REASON FOR REVISION
1	DECEMBER 2016	ADDED ATTACHMENT B TO ACCOMMODATE SOP MODIFICATIONS REQUIRED WHEN SAMPLING FOR PFAS; CHANGED NAMING CONVENTION FOR SOP FROM RMD TO ECR.

Attachment A: SOP Fact Sheet

EQUIPMENT DECONTAMINATION

PURPOSE AND OBJECTIVE			
<p>Removing or neutralizing potential contaminants that may have accumulated on equipment and vehicles ensures protection of personnel, reduces or eliminates potential transfer of contaminants to clean areas, and minimizes the likelihood of sample cross-contamination. Preventing or minimizing potential cross-contamination of samples is important for the collection of representative samples, avoiding the possible introduction of sampling error into sample results, and for protecting the health and safety of site personnel.</p>			
WHAT TO BRING			
<ul style="list-style-type: none"> Field book Appropriate PPE Site-specific HASP Alconox®, Liquinox® or other nonphosphate concentrated laboratory-grade soap Simple Green® or other nontoxic biodegradable cleaner Deionized, distilled, or organic-free water, as appropriate Potable water (or water containers if potable water source on site or nearby) Pump or pressure sprayer Squeeze bottles filled with appropriate decontamination chemicals (e.g., organic solvents, nitric acid) Containers, such as buckets or wash basins (type and number is dependent on the procedure) Scrub brushes Aluminum foil Polyethylene sheeting 			
OFFICE			
<ul style="list-style-type: none"> Prepare/update the site-specific HASP; make sure the field team is familiar with the latest version. Review site-specific sampling plan/QAPP for decontamination procedures and procedures for management of investigation-derived waste (IDW) (e.g., used decontamination solutions). Confirm all required decontamination supplies are in stock or order as needed. 			
ON-SITE			
<table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top; width: 50%;"> <ul style="list-style-type: none"> Verify project HASP including safety data sheets for decontamination chemicals used on site. Conduct daily Health & Safety tailgate meetings, as appropriate. Establish a designated equipment and personnel decontamination area. </td><td style="vertical-align: top; width: 50%;"> <ul style="list-style-type: none"> Provide for the proper collection and management of all IDW. Verify that appropriate PPE is worn by all site personnel (including subcontractors) and the work area is safe. </td></tr> </table>		<ul style="list-style-type: none"> Verify project HASP including safety data sheets for decontamination chemicals used on site. Conduct daily Health & Safety tailgate meetings, as appropriate. Establish a designated equipment and personnel decontamination area. 	<ul style="list-style-type: none"> Provide for the proper collection and management of all IDW. Verify that appropriate PPE is worn by all site personnel (including subcontractors) and the work area is safe.
<ul style="list-style-type: none"> Verify project HASP including safety data sheets for decontamination chemicals used on site. Conduct daily Health & Safety tailgate meetings, as appropriate. Establish a designated equipment and personnel decontamination area. 	<ul style="list-style-type: none"> Provide for the proper collection and management of all IDW. Verify that appropriate PPE is worn by all site personnel (including subcontractors) and the work area is safe. 		
SAMPLING EQUIPMENT DECONTAMINATION - PROCEDURES			
<p>Sampling equipment, such as split-spoon samplers, shovels, hand augers, trowels, spoons, spatulas, bailers, tethers, dippers, and pumps, will be cleaned using the following procedure. A more simplified procedure for decontamination of measuring equipment is presented in the SOP. Note: The overall number of containers needed for collection of decontamination fluids may vary depending on chemical compatibilities, project and regulatory requirements, and ultimate disposal methods for these fluids.</p> <ol style="list-style-type: none"> Lay out sufficient polyethylene sheeting on the ground or floor and the necessary number of containers (e.g., plastic wash basins or buckets) and an air drying area. At a minimum, one container should be designated for the detergent wash. A second container should be designated for water rinsing. A third container may be designated for nonwater rinsing. Nonwater rinsate fluids should not be combined with the detergent wash during decontamination. The decontamination line should progress from “dirty” to “clean”. Note: In instances where acid or solvent rinses are required, additional containers may be needed to manage collection and subsequent disposal of the spent decontamination fluids. Fill the first container with potable water. Add sufficient nonphosphate concentrated laboratory-grade soap to cause suds to form in the container. Brush any visible dirt off of the sampling equipment before getting equipment wet. Using a clean, coarse scrub brush, submerge and wash the sampling equipment in the soap solution in the first container. 			

EQUIPMENT DECONTAMINATION

5. Rinse the equipment with potable water over an appropriate container. If an additional acid or solvent rinse is not required, proceed to Step 8.
6. ****If sampling for metals and if required by the project, rinse the equipment with nitric acid over an appropriate container. Consider using a container dedicated to acidic solutions to minimize the volume of liquid that needs to be neutralized later. A 10 percent nitric acid solution is used on stainless steel equipment. A 1 percent nitric acid solution is used on all other equipment. If not required, this step may be omitted.**
7. ****If sampling for organic parameters and if required by the project, rinse the equipment over an appropriate container using pesticide-grade methanol or isopropanol (see Caution and Potential Problems). If oily, a pesticide-grade hexane rinse should follow the methanol/isopropanol rinse, or as an alternative, Simple Green® can be used if approved by the Project Manager. Consider using an appropriate container dedicated to volatile solvents to minimize the volume of liquid that subsequently needs to be managed as IDW. If not required, this step may be omitted.**
Allow the equipment to completely air dry prior to proceeding to the next step.
**** Steps 6 and 7 are optional and may be used on a site-specific basis. The site-specific sampling plan or QAPP, if available, should be consulted. In the absence of a sampling plan or QAPP, the Project Manager will decide upon the necessity of these steps.**
8. Rinse the equipment over an appropriate container using deionized, distilled or organic-free water.
9. Allow the equipment to completely air dry on a clean surface (e.g., polyethylene sheeting or a clean container).
***NOTE that if temperature or humidity conditions preclude air drying equipment, sufficient spares, if possible, should be available so that no item of sampling equipment need be used more than once. If an ample amount of spare equipment is not available and the equipment will not completely air dry, additional rinses with deionized, distilled or organic-free water should be used. The inability of equipment to air dry and the usage of additional rinses should be recorded in the field logbook or on the appropriate form.**
10. Reassemble equipment, if necessary, and wrap completely in clean, unused, protective material. Reuse of equipment on the same day without wrapping in protective material is acceptable.
11. Spent decontamination fluids are considered IDW and must be managed as directed by the site-specific field program.

INVESTIGATION DERIVED WASTE (IDW) DISPOSAL

Field personnel should review the project work plan and ensure project-specific IDW management documentation and containerization requirements are specified or discussed with the Project Manager before going to the project site.

DATA MANAGEMENT AND RECORDS MANAGEMENT

All reagents used must be documented in the field book or an appropriate field form. Any deviations from the decontamination procedures specified in the work plan, sampling plan or QAPP must be approved by the Quality Assurance (QA) Officer and Project Manager and documented in the field book. The lot number and vendor of each reagent used should be documented in the field logbook. Refer to RMD SOP 001 for field documentation procedures.

DOs AND DO NOTs OF EQUIPMENT DECONTAMINATION

DOs:

- DO call the Project Manager or field team leader if unexpected conditions are encountered or at least daily to update them on site work.
- DO manage and collect IDW in accordance with project requirements.
- DO use deionized, distilled or analyte free water that is provided by the laboratory, is certified analyte-free, and/or meets project requirements.
- DO use sufficient amount of decontamination fluids so that the fluid flows over the equipment and runs off.
- DO use new wrapped disposable dedicated sampling equipment when appropriate to minimize the need for decontamination.

DO NOTs:

- DO NOT use an excessive amount of soap during decontamination.
- DO NOT sign anything in the field unless authorized in writing by client. This includes waste disposal documentation, statements, etc.; call PM if this issue arises.

Attachment B: SOP Modifications for PFAS

Due to the pervasive nature of PFAS in various substances routinely used during sampling and the need to mitigate potential cross-contamination or sampling bias to ensure representative data are collected, special care should be taken when sampling for PFAS. The following table highlights the required modifications to this SOP when sampling for PFAS.

PFAS Equipment Decontamination Protocols	
SOP Section Number	Modifications to SOP
1.3	<ul style="list-style-type: none"> • Use only Alconox® or Liquinox® soap; do not use Decon 90. • Use new plastic buckets for wash and rinse water. • Ensure that PFAS-free water is used during the decontamination procedure. • Do not use aluminum foil.
1.5	<p>Always consult the Site-specific Health and Safety Plan prior to conducting field work. The following considerations should be made with regards to decontamination procedures:</p> <ul style="list-style-type: none"> • Tyvek® suits should not be worn. Cotton coveralls may be worn. • Boots and other field clothing containing Gore-Tex™ or other waterproof/resistant material should not be worn. This includes rain gear. Boots made with polyurethane and polyvinyl chloride (PVC) are acceptable. • Food and drink should not be allowed within the decontamination area. Bottled water and hydration drinks (e.g., Gatorade®) may be consumed in the staging area only. • Personnel involved with decontamination should wear a new pair of nitrile gloves after each decontamination procedure when handling equipment to avoid re-contamination. Avoid handling unnecessary items with nitrile gloves. • Do not store on or cover equipment with aluminum foil after decontamination. Use of polyethylene sheeting is acceptable. • Avoid wearing clothing laundered with fabric softeners. • Avoid wearing new clothing (recommended six washings since purchase). Clothing made of cotton is preferred. • Avoid using cosmetics, moisturizers, hand creams, or other related products as part of cleaning/showering the morning of sampling and decontamination field work.
2.2	<ul style="list-style-type: none"> • New nylon or metal bristle brushes should be used for mechanical cleaning methods. • If high-pressure water is used, it must be tested prior to use for presence of PFAS.
2.3	<ul style="list-style-type: none"> • Ensure that PFAS-free water is used during the decontamination procedure.
2.4	<ul style="list-style-type: none"> • Ensure that PFAS-free water is used during the decontamination procedure.

**Title: Determination of VOCs in Ambient Air
EPA Compendium Methods TO15, & TO3**

Approval Signatures:



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1.0 Scope and Application

This SOP describes the laboratory procedure for the analysis of polar and non-polar volatile organic compounds (VOCs) in ambient and non-ambient air. The procedure is applicable to those VOCs that have been evaluated by the laboratory for their consistent performance in meeting the control criteria put forth in Compendium Method TO-15. While the compendium method is specifically written for the analysis of ambient air samples collected in leak-free passivated stainless steel canisters, it may be applied to the analysis of samples that have employed the use of other collection devices such as Tedlar bags, and are from sources other than ambient air such as soil gas, landfill gas, gas cleaning apparatuses and stack emissions.

This procedure may be also be used to report a variety of carbon ranges, constituent groups like TVOC (total volatile organic compounds), or as unresolved complex mixtures (e.g. Total Hydrocarbons).

1.1 Analytes, Matrix(s), and Reporting Limits

The target compound list and reporting limits for each compound are provided in Table 1A and Table 1B.

2.0 Summary of Method

An aliquot of sample is pulled from the canister through a solid multi sorbent bed trap which reduces the water content of the sample. The sample is thermally desorbed and the VOCs are carried onto a GC column coupled to a mass spectrometer. Compounds are identified by comparison of the mass spectra for individual peaks in the total ion chromatogram to the fragmentation patterns of ions corresponding to VOCs including the intensity of primary and secondary ions as well as the patterns of stored spectra acquired under similar conditions. The concentration of the target compound is calculated by internal standard technique using the average response factor of that compound as determined by the initial calibration.

This procedure is based on EPA Compendium Method TO-15 "Determination of Volatile Organic Compounds in Ambient Air using Specially Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry", US EPA, January, 1999 and Method TO-3 "Method for the Determination of Volatile Organic Compounds In Ambient Air Using Cryogenic Pre Concentration Techniques and Gas Chromatography with Flame Ionization and Electron Capture Detection", USEPA, April 1984.

If the laboratory has modified the method, a list of these modifications may be found in Section 16.0.

3.0 Definitions

A list of terms and definitions are provided in Appendix A.

4.0 Interferences

Contamination may occur if canisters or other equipment is not properly cleaned before use. The laboratory procedures for canister and flow controller cleaning procedures are provided in Appendices C and D.

5.0 Safety

Employees must abide by the policies and procedures in the Corporate Environmental Health and Safety Manual (CW-E-M-001) and this document. This procedure may involve hazardous material, operations and equipment. This SOP does not purport to address all of the safety problems associated with its use. It is the responsibility of the user of the method to follow appropriate safety, waste disposal and health practices under the assumption that all samples and reagents are potentially hazardous. Safety glasses, gloves, lab coats and closed-toe, nonabsorbent shoes are a minimum.

5.1 Specific Safety Concerns or Requirements

The analytical system contains zones with elevated or depressed temperatures that are capable of causing injury upon direct contact. The analyst needs to be aware of the locations of those zones, and allow them to return to room temperature prior to maintenance activities or take measures to avoid contact with hot and/or cold surfaces. There are areas of high voltage in the analytical system. Depending on the type of work involved, either turn the power to the instrument off, or disconnect it from its source of power.

Liquid nitrogen (LN₂) is used for cryogenic purposes. In addition to avoiding contact with LN₂ cooled surfaces, analysts must be aware of the potential for oxygen depletion in a confined space in the event of an unexpected large release of the product. Users should evacuate a confined space in which large amounts of LN₂ have been released.

Sample canisters are occasionally pressurized for cleaning or sample dilution purposes. Lab systems are designed to ensure that the cans are not pressurized above 40 psi. Eye protection must be worn when cans are pressurized in the event of a canister failure.

5.2 Primary Materials Used

There are no materials used in this method which have a serious or significant hazard rating

NOTE: This list does not include all materials used in the method. A complete list of materials used in the method can be found in the reagents and materials section. Employees must review the information in the SDS for each material before using it for the first time or when there are major changes to the SDS.

6.0 Equipment and Supplies

Catalog numbers listed in this SOP are subject to change at the discretion of the vendor. Analysts are cautioned to be sure equipment meets the specification of this SOP.

6.1 Sampling Equipment

- 6L and 1L SUMMA® Canisters: Leak-Free, Passivated Stainless Steel, with Swagelok DSS4 Valves, or equivalent. Maximum rated pressure 40 psig.
- 6L SUMMA® Canisters: Silicon lined-Leak-Free, Passivated Stainless Steel, with Swagelok DSS4 valves or equivalent. Maximum rated pressure 40 psig.
- Flow Controllers: Restek Catalog #24239 or equivalent.
- Flow Controller Orifice: Various sizes ranging from 0.008" to 0.060", Restek or equivalent.
- Flow Controller Vacuum Gauges: Capable of measuring vacuum to an absolute vacuum of -30" of HG, and pressure up to 30 psi, Grainger Catalog #5WZ37 or equivalent
- Rain Guard: Stainless Steel Tubing ¼", 10ft. Grainger or Equivalent. Cut 8" and bend into a J shape using a pipe bender.
- Stainless Steel Pre-Filter (7 um): Swagelok Catalog# SS-4F-T7-7 or equivalent
- Teflon Tape: Home Depot Brand or equivalent.

6.2 Analytical System

- Mass Spectrometer: Agilent 5973, 5975 MSD or equivalent.
- Gas Chromatograph: Agilent 6890, 7890, or equivalent.
- VOC Autosampler: Entech 7016CA or equivalent.
- Cryogenic Concentrator: Equipped with an electronic mass flow controller that maintains a constant flow for carrier gas and sample over a range of 0-200 cc/min. Entech 7100A, 7200, or equivalent.

- Low Pressure Liquid Nitrogen: Air Gas or equivalent.
- Glass Bead Cryotrap: Capable of effectively removing water while trapping polar and non-polar compounds. Entech catalog# 01-04-11320.
- TENAX Sorbent Trap: Capable of removing CO₂ and trapping the polar and non-polar compounds. Entech catalog # 01-04-11330. Primary Column: Fused silica capillary column (60 m x 0.32 mm x 1.8 µm), Restek RTX-624 or equivalent.
- Data System: PC software for Entech instrumentation. Hewlett-Packard ChemStation data acquisition software, TestAmerica Chrom and TestAmerica LIMS (TALS).
- NIST Mass Spectral Library and Search Program, 2014 release or newer

6.3 Cleaning System

- Canister Cleaner Module and Software: Capable of filling canisters with humidified air and evacuating canisters to 50 mtorr, Entech Model 3100A or equivalent.
- Vacuum Pump: Capable of evacuating sample canisters to full vacuum. Vacuubrand or equivalent.
- Cleaning Manifold: Equipped with stainless steel and Teflon transfer lines and connections for cleaning up to twelve canisters simultaneously.
- Heating Belts: Individual thermal-stated heating belts used to heat canisters to 100°C during the manifolds cleaning cycles. Entech or equivalent.
- Cleaning oven: Capable of cleaning 6 Summa Cans simultaneously at a temperature of 100°C. Entech or equivalent.
- Flow Controller Cleaning Manifold: Capable of flushing hot Nitrogen through 24 flow controllers simultaneously for cleaning.

6.4 Miscellaneous Supplies

- Mass Flow Controller, NIST Traceable: Capable of flow rate of 70 mL/min, McMillan Company 80SD or equivalent. Use for the preparation of calibration and working standards.
- Syringes: Gas tight with a Luer-Lok tip, assorted sizes ranging from 1.0 mL to 1.0 L, SGE or equivalent.
- Digital Pressure Gauges, NIST Traceable: Capable of measuring pressure in the range of -30" Hg to 100 psi, Dwyer Models DPGA-12 and 67100 or equivalent
- Digital Flow Meter, NIST Traceable: Alltech or equivalent.
- Nitrogen Gas

7.0 Reagents and Standards

7.1 Reagents

Nitrogen- Gas off bulk Liquid Nitrogen tank. Air Gas or equivalent vendor

7.2 Standards

Purchase the following stock standard mixtures from commercial vendors:

- Mixed Gas Stock Standard: - Commercially prepared standard that includes internal standard and tune standard compounds: Bromofluorobenzene, Bromochloromethane, 1,4-Difluorobenzene, and Chlorobenzene-d₅, at a concentration of 100 ppbv each. Spectra Gas or equivalent.
- Calibration Stock Standard: - Commercially prepared custom gaseous stock standard used by all network facilities that includes all target analytes at a concentration of 1.0 ppmv. Spectra Gases or equivalent.

- Calibration Ethanol Neat Material. >99.5 %
- ICV / LCS Stock Standard: - Custom made gaseous stock standard prepared from a different lot(s) of the source material(s) used to manufacture the calibration stock standard. The ICV/LCS stock standard includes all target analytes at a concentration of 1.0 ppmv. Spectra Gases.
- ICV/LCS Ethanol Neat material. >99.5% from a source other than the calibration source.

Prepare calibration and working standards mixtures by diluting a known volume of the stock standard with ultra pure zero air to a specified volume into a humidified summa canister. The summa canister is humidified by adding 100ul of VOA free reagent water. The volume of the standard added to the canister is calculated using the set flow rate of 70mL/min using a mass flow meter multiplied by the time of the standard addition, plus the inclusion of the 25ml volume for the tubing connecting the mass flow meter to the summa canister. The formulations for standard preparation are provided in Appendix B along with recommended expiration dates and storage conditions.

Each stock standard is assigned a 1 year expiration date from manufacture and recertified annually. See BR-QA-002 for details on the recertification process. The ethanol neat material is assigned the expiration date given by the manufacturer.

8.0 Sample Collection, Preservation, Shipment and Storage

The laboratory does not perform sample collection so these procedures are not included in this SOP. Sampling requirements may be found in the published reference method.

Matrix	Sample Container	Minimum Sample Size	Preservation	Holding Time	Reference
Air	1L or 6L Passivated Summa Canister*	1L	NA	30 days from collection	EPA TO-15

*1 liter Tedlar bags are only provided upon client request, however clients are discouraged from using Tedlar bags due to the shortened holding time of 72 hours from collection.

All samples should be collected in passivated stainless steel canisters that have been certified clean prior to sampling. The laboratory will provide certified clean canisters to the client upon request. The procedures for clean canister certification are provided in Laboratory SOP BR-AT-011.

The laboratory can also provide flow controllers set to the appropriate flow rate for the sampling time required by the client.

The laboratory ships air canisters in custom made boxes. The boxes are equipped with custom-made foam inserts to hold the pre-set flow-controllers. The shipping materials are designed to prevent damage of equipment to and from the sampling site. The laboratory checks the equipment to ensure it is in proper working order before shipment to the client and additional checks are performed on return of the equipment to the laboratory. Sampling instructions are provided with each sampling kit. The sampling crew is advised to handle the sampling equipment using the instructions provided by the laboratory to ensure optimum performance.

The laboratory's sample acceptance policy for air samples in canisters requires that the sampling crew record the ID of the flow controller used for sample collection on the tag attached to each canister, but

the association may also be recorded on the Field Test Data Sheet or a COC. With this information the laboratory can review the history of use of the FC as needed to troubleshoot potential equipment problems. Without the association, the history of use of the FC is unknown. The laboratory strongly recommends that field samplers be instructed to provide this information for each sampling event.

The return pressure of each canister should be between -10" Hg to -1"Hg, except for "grab" samples or samples with a collection rate of 100 or 200 mL/min, which must have a pressure greater than or equal to -10" Hg. The residual vacuum criteria ensure that the sample was collected over the time period the flow controller was calibrated for.

9.0 Quality Control

9.1 Sample QC

The following quality control samples are prepared with each batch of samples.

QC Item	Frequency	Acceptance Criteria
Method Blank (MB)	1 in 20 or fewer samples	See Table 3
Laboratory Control Sample (LCS)	1 in 20 or fewer samples	See Table 3
Internal Standard (ISTD)	Every Sample	See Table 3
Laboratory Control Sample Duplicate (LCSD)	Client request	See Table 3
Sample Duplicate (SD)	Client Request Required for DoD, 1 in 20 or fewer samples	See Table 3
Trip Blank (TB)	Client Request	See Table 3

NOTE: The compendium reference method does not require the analysis of a laboratory control sample (LCS) or provide criteria for the evaluation of an LCS. The laboratory performs an LCS at the above mentioned frequency as an evaluation of percent recovery in a blank matrix. The laboratory uses statistically derived control limits for the LCS.

Unless otherwise specified by the client during project initiation, the LCSD will be used to measure precision only. The LCS will be used for evaluations for percent recovery and to determine if corrective action is necessary.

9.2 Instrument QC

The following instrument QC is performed:

QC Item	Frequency	Acceptance Criteria
Tune Standard (BFB)	Each Analytical Window	See Section 10.0
Initial Calibration (ICAL)	Initially; when ICV or CCV fail	See Section 10.0
Initial Calibration Verification (ICV)	Once, after each ICAL	See Section 10.0
RT Window Establishment	Once per ICAL	See Section 10.0
Relative Retention Time (RRT)	With each sample	See Section 10.0
Continuing Calibration Verification (CCV)	Daily, after each BFB	See Section 10.0

10.0 Procedure

10.1 Support Equipment Calibration

Verify the calibration of the mass flow controller used to prepare standards, the calibration of the digital flow meter used to set and check the flow rates of the FC(s) used for sample collection, the calibration of the digital pressure gauges used to check return canister pressure, and the calibration of the stop watch used to measure standard addition time is current to the year. Immediately notify the QA department if the calibration is not current and wait for further instruction. Equipment whose calibration has expired may not be used without documented approval from the QA department.

NOTE: The QA department schedules the annual calibrations of the support equipment and maintains all Certificates of Calibration. The flow controllers are checked against a NIST traceable standard. This check is performed by the manufacturer of the equipment, when possible, or by an approved vendor that provides certification service.

10.2 Instrument Calibration

10.2.1 Tune Standard

Analyze a tune standard (BFB) prior at the beginning of each analytical window. The tune standard is a commercially prepared mixed gas stock standard that includes bromofluorobenzene (BFB) at a concentration of 100 ppbv.

To analyze the tune standard:

- 1) Establish the instrument operating conditions specified in Section 10.4.1.
- 2) Attach the mixed gas stock standard to the Entech concentrator by attaching the cylinder to the line dedicated for introduction of the internal standard (ISTD). The concentrator directly injects 20 mL of the 100 ppbv stock standard onto the instrument to yield an on column concentration of 10 ppbv.
- 3) Acquire the data and evaluate the results against the acceptance criteria given in Table 2. Criteria must be met prior to further analysis. The official start time of the 24 hour analytical window is the injection time of a passing tune standard. All samples must be injected within 24 hours of that time.

NOTE: The data processing system averages three scans (apex scan, scan prior, and scan following) and performs background subtraction of the single scan prior to the elution of BFB.

10.2.2 Initial Calibration (ICAL)

The instrument must be calibrated with a minimum of five calibration standards for each target analyte at concentrations that span the working range of the method.

The laboratory routinely analyzes 8 standards at the recommended concentrations of 0.04, 0.20, 0.50, 5.0, 10.0, 15.0, 20 and 40 ppbv, except for Ethanol. For Ethanol, a 6 point curve is analyzed at the following concentrations: 5, 10, 15, 20, 40, and 100 ppbv. Even though eight calibration standards are routinely analyzed not every calibration standard is used for each analyte. Each analyte has been assigned to an analyte group that includes a calibration range of at least five standards. The analyte group associations for each target analyte are provided in Table 1A and Table 1B. The calibration range for each analyte group is as follows:

- Group A: This analyte group is associated with a seven point calibration curve. The calibration range is 0.20 to 40 ppbv with the 0.04 ppbv standard excluded. The limit of quantitation (LOQ) for this group of analytes is 0.20 ppbv
- Group B: This analyte group is associated with a six point calibration curve. The calibration range is 0.50 to 40 ppbv with the 0.04 and 0.20ppbv standards excluded. The limit of quantitation (LOQ) for this group of analytes is 0.50 ppbv.
- Group C: This analyte group is associated with a five point calibration curve. The calibration range is 5.0 to 40 ppbv with the 0.04, 0.20, and 0.50ppbv standards excluded. The limit of quantitation (LOQ) for this group of analytes is 5.0 ppbv.
- Group D: This analyte group is an eight point calibration curve. The calibration range is 0.04 to 40 ppbv. The limit of quantitation (LOQ) for this group of analytes is 0.04 ppbv.
- Group E: (Ethanol): This analyte has a six point calibration curve. The calibration range is 5 to 100 ppbv. The limit of quantitation (LOQ) for this analyte is 5 ppbv.

Prepare the calibration standards using the formulations provided in Appendix B.

Analyze the standards in a sequence from lowest to highest concentration using the instructions provided in Section 10.4.2.

The data processing system calculates a relative response factor (RRF), for each analyte and isomer pair using the assigned internal standard. The internal standard associations for each target analyte are provided in Table 1A and 1B. The data processing system also calculates a mean relative response factor, relative standard deviation (RSD), relative retention time (RRT) and the mean RRT.

The following criteria must be met for a calibration to be considered acceptable:

- The RSD for each target analyte must be <30% with at most 2 exceptions up to a limit of 40%.
- The area response for the primary quantitation ion for the internal standard for each ICAL standard must be within 40% of the mean area response over the calibration range for each internal standard.
- The RRT for each target compound at each calibration level must be within 0.06 RRT units of the mean RRT for the compound. The retention time shift for each of the internal standards at each calibration level must be within 20 seconds of the mean retention time over the initial calibration range for each internal standard.

If these criteria are not met inspect the system for problems and perform corrective action. Recommended corrective actions are provided in Section 10.2.5 and in Table 3.

Repeat initial calibration whenever instrument operating conditions are changed, a new column is installed, when significant instrument maintenance has been performed, and when the result of the CCV indicate the calibration is no longer valid.

10.2.3 Second Source Calibration Verification (ICV)

Immediately following an acceptable initial calibration verify the accuracy of the calibration by the analysis of the second source calibration verification standard (ICV).

Prepare the ICV following the formulation provided in Appendix B.

Analyze the ICV following the instructions provided in Section 10.4.2.

The percent recovery (%R) for each target analyte must be within 70-130%. If criteria are not met, perform corrective action. Recommended corrective actions are provided in Table 3. If corrective action is not successful, remake your standards and recalibrate.

If after successful analysis of the ICV, time remains in the 24-hour analytical window, QC and field samples may be analyzed without analysis of a continuing calibration verification check standard. If time does not remain in the analytical window, a new analytical sequence must be initiated with a Tune Standard followed by daily calibration (CCV).

10.2.4 Continuing Calibration Verification (CCV)

Analyze the CCV immediately after the tune standard unless the analytical window includes ICAL, in which case, a CCV is not required.

Prepare the CCV standard using the formulation given in Appendix B. The recommended concentration of the CCV for each target analyte is 10.0 ppbv.

Analyze the CCV following the instructions provided in Section 10.4.2. The data system calculates a response factor for each analyte and calculates the percent difference (%D) of the RRF relative to the mean RRF in the most recent initial calibration.

- The %D for each target analyte must be within $\pm 30\%$. If the above criteria are not met, repeat the analysis of the CCV once. If the second CCV meets criteria, continue with the analytical sequence. If it fails, evaluate the data to determine if one of the following conditions is met. If these conditions are not met corrective action must be taken. Guidance for troubleshooting is provided in Section 10.2.5. After corrective action the analytical sequence may be continued only if two immediate, consecutive CCVs at different concentrations are within acceptance criteria. If these two CCVs do not meet the criteria, recalibration is required prior to further analysis.
- DoD QSM 5.1 requires that the closing CCV recover within $\pm 30\%$. EPA Methods TO-14 and TO-15 do not include a closing CCV requirement, but they do have an opening CCV with a $\pm 30\%$ limit. If these criteria are not met, immediately analyze two additional consecutive CCVs. If both pass, samples may be reported without reanalysis. If either fails or if two consecutive CCVs cannot be run, perform corrective action(s) until a passing CCV is attained, and then reanalyze all associated samples since last acceptable CCV. If necessary, perform a new initial calibration and then reanalyze all associated samples since the last acceptable CCV. If reanalysis cannot be performed, data must be qualified and explained in the Case Narrative.

Note: Per DoD QSM5.1, if samples cannot be re-analyzed, the data MUST be qualified with a Q flag and an explanation must be provided in the case narrative. With client permission, closing CCV criteria of 50% can be utilized.

- If the CCV criteria are exceeded high, indicating a high bias, and the associated samples have non-detects for those analytes, the analytical data may be considered usable. In the absence of instructions otherwise, proceed with analysis.
- If the CCV criteria are exceeded low, indicating a low bias, analytical results may be reported if those results exceed the project's regulatory decision level. In other words, if the analytical results are sufficiently high to counter the low bias, results may be reported. Consult with the project manager to determine if the exception is allowable for each project.

10.2.5 Troubleshooting

Check the following items in case of calibration failures:

- Loss of sensitivity or unstable ISTD recoveries are usually the result of a leak. Check the union between the GC column and Entech transfer line.
- Loss of sensitivity for individual compounds may be a result of either an active site in a transfer line or a bad trap. Troubleshoot and perform maintenance as necessary.
- Poor chromatography usually requires GC column maintenance, perform as necessary.
- Carryover is usually caused by excessive amounts of analyte introduced to the system. Analyze blanks until the system is cleaned or replace the traps and transfer lines if necessary.

Refer to corporate policy CA-Q-S-005 for additional information of procedures to establish and troubleshoot initial calibration curves.

10.3 Sample Preparation

10.3.1 Post Sampling Canister Pressure Check Procedure

The post-sampling canister pressure check is performed at the time of sample login by sample management staff so that any problems found are quickly identified and communicated to the client.

Refer to the current version of SOP BR-SM-001 for the procedure to take and record the post sampling canister pressure check.

10.3.2 Sample Screening

At the laboratory's discretion unknown samples may be screened prior to initial analysis to determine if the sample requires dilution. Unless otherwise requested by the client the laboratory does not provide screen data with the data package report even when primary dilutions are performed based on the results of the screen analysis.

To prepare a sample for screen analysis, connect the sample canister to the autosampler connected to screening instrument and analyze 20 mL of sample. Acquire and evaluate the results. If the results of screen analysis indicate that a target compound is above its upper range of calibration, calculate a

recommended dilution factor (DF) by dividing the concentration of analyte found by 30. Record the recommended DF on the screen worksheet.

NOTE: Samples are screened on a GC/MS instrument that is programmed with the operating conditions given in Section 10.4.1 of this SOP. The calibration is checked weekly with a single point calibration standard at a concentration of 10 ppbv for all target analytes. The calibration is checked more frequently when the results of instrument analysis do not correlate well with the results of the screen analysis.

10.3.3 Sample Dilutions & Pressure Adjustment

Field samples should be diluted prior to initial analysis when the screen results indicate that the concentrations are above calibration range and when the laboratory has sufficient knowledge of the sample (history) to know that the sample will require dilution. Field samples must be reanalyzed at a dilution initial analysis when the concentration of target compounds in initial analysis exceed of the upper range of calibration.

When the return negative pressure of a canister is greater than -10"Hg, make-up air may be added to provide sufficient volume of make-up air in order to have an adequate sample volume for analysis. The addition of make-up air is considered a canister dilution. Some concentrators are able to pull full sample volume even if the residual vacuum is lower than -10"Hg so make-up air may not be necessary.

For samples analyzed for constituent groups (e.g. TVOC as Toluene), ranges, and or unresolved complex mixtures (Total Hydrocarbons), samples must be diluted such that the maximum peak height of any sample constituent under consideration does not exceed the equivalent peak height generated by highest calibration level standard. For evaluation it may be useful to graphically overlay sample chromatograms with that of the high point calibration standard.

To dilute the sample:

- 1) Attach the sample canister to the nitrogen gas line equipped with a pressure gauge that reads negative pressure in ("Hg) and positive pressure in (psig).
- 2) Ensure the valve of the nitrogen gas line is closed then open the valve of the sample canister. Record the negative pressure reading in the Canister Dilution Worksheet or on the canister's tag.
- 3) Slowly open the valve of the nitrogen gas line and fill the canister until canister pressure gauge reads -10"Hg. Do not open the valve to such an extent that the nitrogen gas line pressure drops below 15 psig and do not allow the nitrogen gas line to reach equilibrium otherwise you will contaminate the nitrogen gas line.
- 4) When the desired pressure is achieved, close the canister valve and the valve on the nitrogen gas line; wait 15 seconds. The pressure should not exceed 40 psig.
- 5) Open the canister valve and record the final pressure reading in psig.
- 6) Close the canister valve and remove the valve from the zero air line.

- 7) Record the initial and final pressure readings in the TALS canister dilution tracking module. If the final pressure is below ambient, the "HG reading must be converted to psig by dividing the value by 2 prior to entry into the TALS worksheet.

When the return pressure of a canister is positive, the pressure must be adjusted to near ambient (0"Hg) prior to analysis. To adjust the pressure to ambient, vent the canister to ambient in a fume hood by opening the canister valve for ~4-5 seconds, close the valve. For higher pressure canisters, open the valve and listen for a release of air then close the valve when the sound recedes.

If a trip blank is provided, pressurize the trip blank canister to 10 psig. The pressurization of the trip blank is not considered a dilution.

10.3.4 QC Sample Preparation

To prepare the method blank (MB): Fill a clean canister that has never been used to collect environmental samples and has never left the laboratory to 20 psig with nitrogen gas. Continue to use this canister as the MB until the pressure of the canister reaches 0 psig, at which time, recharge with nitrogen gas to 20 psig and reuse.

To prepare the LCS: Follow the instructions provided in Appendix B for preparation of the working ICV/LCS standard. If an LCSD is requested, analyze the LCSD from the same canister as the LCS.

10.4 Sample Analysis

10.4.1 Instrument Operating Conditions

Optimize the GC and MS conditions for compound separation and sensitivity.

The recommended operating conditions are as follows:

Thermal Desorb:	Initial Trap #1 Temperature: -110°C Desorb Temperature from Trap #1 to #2: 0 °C Total Volume Transfer by Mass Flow Controller: 40 mL Initial Trap #2 Temperature: -15 °C Desorb Temperature from Trap #2 to #3: 200°C Transfer time 3.5 minutes Initial Trap #3 Temperature: -165 °C Injection Trap #3 Temperature: 70°C Injection Time: 1.5 minutes Trap #3 Temperature after Injection: -165 °C
Carrier Gas:	Helium, Ultra High Purity
Cryogenic Focusing Gas:	Liquid Nitrogen
Flow Rate:	~1.5 mL/min
Temperature Program:	Initial Temperature: 40°C Initial Hold Time: 4 minutes Ramp1 Rate: 20°C/min. to 200°C. Ramp 2 Rate: 40°C/min. to 220°C Final Temperature: 220°C Final Hold Time: 6.5 minutes
Electron Energy:	70 electron volts

Mass Range: 35-265 amu
Scan Time: ≥ 1 scan per second

These operating conditions may be changed but once the operating conditions are established for initial calibration the same conditions must be used until a new calibration is performed.

10.4.2 Daily Instrument Maintenance

Prior to analysis initiate the flushing sequence using the Entech software. Then initiate the bake program using the Entech software.

10.4.3 Bi-Weekly Instrument Maintenance

At a minimum frequency of once every two weeks, perform an autosampler leak check. Cap all autosampler ports and initiate the leak check program using the Entech software. Record this check in the instrument maintenance log.

10.4.4 Analytical Sequence

An example analytical sequence that includes initial calibration (ICAL) is provided below. When ICAL is not performed, the sequence begins with the tune standard and is followed by the CCV, LCS, LCSD, and method blank. If sufficient time remains in the 24 hours analytical window after initial calibration, QC and field samples may be analyzed without the CCV and the ICV will serve as the LCS for the sequence. The MB, LCS and LCSD must be analyzed at a frequency of every 20 samples or with each analytical sequence whichever is more frequent.

1. Tune Standard (BFB)
2. ICAL
3. ICV
4. CCV
5. LCS (repeat every 20 samples)
6. LCSD (when requested)
7. MB (repeat every 20 samples)
8. Field Samples (including trip blanks)

Attach the canisters to the autosampler inlet in the order of the analytical sequence then initiate the analytical sequence. The autosampler introduces 200 mL of sample volume from each canister to the instrument system and adds 20 mL of the mixed gas standard to each sample.

Acquire the data and evaluate the results to confirm qualitative identification and quantification.

11.0 Calculations / Data Reduction

11.1 Qualitative Identification

The data processing system tentatively identifies target analytes by comparing the retention time of the peaks to the window set around the continuing calibration standard, and searches in that area for the primary ion and up to two secondary ions characteristic of the target analyte.

All tentative identifications made by the computer are reviewed and either accepted or rejected by the primary analyst. The identification made by the system is accepted when the following criteria are met:

- The target analyte is identified by comparison of its background subtracted mass spectrum to a reference spectrum in the NIST14 database. In general, all ions that are present above 10% relative abundance in the mass spectrum of the standard should be present in the mass spectrum of the sample component and their relative abundances should agree within 20%. For example, if an ion has a relative abundance of 30% in the standard spectrum, its abundance in the sample spectrum should be in the range of 10-50%. Some ions, particularly the molecular ion, are of special importance if a tentative identification is to be made, and should be evaluated even if they are below 10% relative abundance.
- The GC retention time for the target analyte should be within 0.06 RRT units of the daily standard.

Identification requires expert judgment when sample components are not resolved chromatographically and produce mass spectra containing ions contributed by more than one analyte. When GC peaks obviously represent more than one sample component (i.e., broadened peak with shoulder(s) or valley between two or more maxima), appropriate analyte spectra and background spectra can be selected by examining plots of characteristic ions for tentatively identified components. When analytes coelute (i.e., only one GC peak is apparent), the identification criteria can be met but each analyte spectrum will contain extraneous ions contributed by the coeluting compound. If the data system does not properly integrate a peak, perform manual integration. All manual integration must be performed and documented in accordance with corporate SOP CA-Q-S-002 *Manual Integration*.

11.2 Quantification of Target Analytes

After a compound has been identified, the data system quantifies the on-column concentration of the target compound based on the integrated abundance of the characteristic ion from the EICP. If there is matrix interference with the primary ion, a secondary ion may be used for quantification by calculating a mean RF factor for that ion and using that ion to quantify the analyte in the sample. When secondary ion calculations are required, include this information in the non-conformance report and project narrative.

Samples analyzed for constituent groups, ranges, and or unresolved complex mixtures are quantified as follows;

11.2.1 TVOC as Toluene

An internal standard type quantification response factor is generated using the RIC peak response measured for Toluene and its associated internal standard (as detailed in the calculation section). That response factor is used to quantify all RIC chromatographic sample response with the exception of those peak responses associated with internal standards. The results are reported as 'TVOC (as Toluene)'.

Retention Time Range: Propene to Naphthalene

11.2.2 GRO as Octane

An internal standard type quantification response factor is generated using the RIC peak response measured for Octane and its associated internal standard (as detailed in the calculation section). That response factor is used to quantify all RIC chromatographic sample response with the exception of those peak responses associated with internal standards that eluted within the retention time range as

defined by the elution of 2-Methyl-Butane through Decane (C5-C10). The results are reported as 'GRO (as Octane).

Retention Time Range: 2-Methyl-Butane to n-Decane

11.2.3 Unresolved Complex mixtures

An internal standard type quantification response factor is generated using the RIC peak response measured for the un-resolved complex mixture (i.e. the gasoline envelope) and its associated internal standard (as detailed in the calculation section). That response factor is used to quantify all similarly chromatographing RIC sample response with the exception of those peak responses associated with internal standards. The results are reported using the name of the unresolved complex mixture used in the calibration (e.g. Total Hydrocarbons).

Retention Time Range: Propene to Naphthalene

Final results are calculated in TALS.

11.3 Calculations

Analytical results are calculated as follows:

• Dilution Factor

$$DF = \frac{V_2}{V_1} \times \frac{V_4}{V_3}$$

Where:

V_1 = Pre-Dilution Canister Volume

V_2 = Post-Dilution Canister Volume

V_3 = Sample Amount (mL)

V_4 = Base Sample Amount (200 mL)

Relative Response Factor (RRF)

$$RRF = \frac{(A_x)(C_{is})}{(A_{is})(C_x)}$$

Where:

A_x = Area of the quantitation ion of the analyte

A_{is} = Area of the quantitation ion of the internal standard

C_x = Concentration of analyte in concentration units (ppbv)

C_{is} = Concentration of internal standard in concentration units (ppbv)

• Percent Relative Standard Deviation (%RSD)

$$\%RSD = \frac{SD}{Mean} \times 100$$

Where:

SD = Standard deviation individual response factors

Mean = Average of five response factors

• Sample Concentration

$$C_x = \frac{(A_x)(C_{IS})}{(A_{IS})(RRF)} (DF)$$

Where:

C_x = Compound concentration (ppbv)

C_{IS} = Concentration of associated internal standard (ppbv)

A_{IS} = Area of quantitation ion for associated internal standard

A_x = Area of quantitation ion for compound

DF = Dilution Factor

Mean RRF = Average Relative Response Factor from initial calibration.

• Unit Conversion from ppbv to ug/m3

$$\text{Analytical Result (ug/m3)} = \text{Result(ppbv)} \times \left(\frac{\text{mw}}{24.45} \right)$$

Where:

mw = molecular Weight

Example:

Benzene Result = 56 ppbv

Benzene mw = 78.108

$$\text{Analytical Result (ug/m3)} = 56 \text{ ppbv} \times \left(\frac{78.108}{24.45} \right)$$

Result(ug/m3) = 178.9 ug/m3 reported as 180 ug/m3

• Percent Recovery (%R)

$$\%R = \frac{C_s}{C_n} \times 100\%$$

Where:

C_s = Concentration of the spiked sample (ppbv)

C_n = Nominal concentration of spike added (ppbv)

• Precision (%RPD)

$$RPD = \frac{|C_1 - C_2|}{\left(\frac{C_1 + C_2}{2} \right)} \times 100$$

Where:

C_1 = Measured concentration of the first sample aliquot

C_2 = Measured concentration of the second sample aliquot

Formula of Standard Addition:

$$\text{Volume (mL)} = (\text{FR} \times \text{T}) + 25 \text{ mL}$$

Where:

FR = flow rate in mL/min

T = time in minutes

Example FR = 70ml/min
 Time = 10.69 minutes
 Volume = 25+ (70 x 10.69) = 773 mL

Total Volume of diluted standard

$$\text{Volume (mL)} = \text{CV} \times \text{P}$$

Where:

CV = canister volume in mL

P = pressure in Bar (14.7psi per Bar)

Example: CV = 6185 mL
 P = 2.5 Bar
 Volume = 15462 mL

11.4 Data Review

11.4.1 Primary Review (Performed by Primary Analyst)

Upload the data files to TALS. Enter batch editor information and add the standards and reagents to the TALS batch. Review the results against acceptance criteria. If acceptance criteria are not met, make arrangements to perform corrective action.

Check the results of samples analyzed immediately after high concentration samples for signs of carry-over. Reanalyze the sample if carry over is suspected.

Dilute and reanalyze samples whose results exceed the calibration range. The diluted analysis should result in a determination within the upper half of the calibration curve.

Set results to primary, secondary, acceptable or rejected as appropriate.

Verify corrective action was taken for all results not within acceptance criteria. If corrective action is not taken or was unsuccessful, record all instances where criteria are not met with a nonconformance memo (NCM). Be sure to provide explanation of your decision making in the internal comment section of the NCM. The internal comment section should list the reason the NCM is suspected, which action (if any) was taken and why and the outcome of the action taken.

Review project documents such as the Project Plan (PP), Project Memo or any other document/process used to communicate project requirements to ensure those project requirements were met. If project requirements were not met, immediately notify the project manager (PM) to determine an appropriate course of action.

Set the batch to 1st level review.

Record your review on the data review checklist.

11.4.2 Secondary Review (Performed by Peer Reviewer)

Review the project documents such as the Project Plan (PP), Project Memo or any other document/process used to communicate project requirements and verify project requirements were met. If project requirements were not met, immediately notify the project manager (PM) to determine an appropriate course of action.

Review records (these records include but are not limited to the Pre-Shipment Clean Canister Certification Report, Flow Controller Set Flow Rate and Leak Check Record, Field Test Data Sheets, and the Air Canister Return Pressure Check Record) associated with release and return of air sampling equipment to ensure all anomalies are properly recorded. Compare any problems noted in these documents with the analytical results and record any findings in the narrative note program or otherwise communicate your findings to the PM for inclusion in the project narrative.

Review the TALS batch editor to verify information is complete. Review the batch to verify that the procedures in this SOP were followed. If discrepancy is found, resolve the discrepancy and verify any modifications to the SOP are approved and are properly documented.

Spot-check 15% of samples in the batch to verify quantitative and qualitative identification. If the samples are being analyzed under DoD methods 100% of data must be checked during secondary review.

If manual integrations were performed:

- Review each manual integration to verify that the integration is consistent and compliant with the requirements specified in corporate SOP CA-Q-S-002.
- Check to ensure an appropriate technical reason code is provided for each manual integration. Acceptable technical reason codes are provided in corporate SOP CA-Q-S-002.
- Generate a “before” and “after” chromatogram for every manual integration performed on an instrument performance check standard (Tune, ICAL, ICV, CCV), QC sample (MB, LCS) and for any manual integration performed on any surrogate or internal standard in any field sample, if not already performed automatically by the software..
- Generate the Manual Integration Summary Report if not automatically generated by the software. Document your review of manual integrations on the summary report and obtain any review signatures of integrations performed during secondary review as required.

If the reviewer disagrees with the integration performed by the primary analyst, the secondary data reviewer should not change the integration. Instead, he/she should consult with the primary analyst that performed the integration and both the reviewer and the primary analyst should agree the integration should be changed. If consensus between the primary analyst and the peer reviewer cannot be achieved; both should consult with the Technical Manager or department management for resolution. Any changes to the

integration should be performed by the primary analyst. If it is necessary for the secondary reviewer to perform the manual integration because the primary analyst is out of the office; the integration made by the peer reviewer must be reviewed by another peer reviewer or by department management to verify the integration was performed and documented in compliance to SOP CA-Q-S-002. If the original analyst that performed the integration is out of the office, the data reviewer may consult with the Department Manager (DM), Department Supervisor (DS) or the Technical Manager (TM) to verify the change he/she thinks is needed is warranted and should be made.

Verify that the performance criteria for the QC items listed in Table 1A or 1B were met. If the results do not fall within the established limits verify that corrective actions were performed. If corrective action was not performed; verify the reason is provided and that the situation is properly documented with an NCM. Set samples to 2nd level review.

Run the QC checker and fix any problems found. Run and review the deliverable. Fix any problems found. When complete set the method chain to lab complete and forward any paperwork to report/project management.

Record second level review on the data review checklist.

11.5 Data Reporting

Report analytical results above the reporting limit (RL) as the value found. Report analytical results less than the RL, to the adjusted RL with a "U" data qualifier. Adjust the RL for sample dilution/concentration. The unadjusted RL for each target analyte is provided in Table 1A and 1B. For Method TO3 the laboratory does not report values below the reporting limit.

Data reporting and creation of the data deliverable is performed by TALS using the formatters set by the project manager during project initiation.

Electronic and hardcopy data are maintained as described in laboratory SOP BR-QA-014 Laboratory Records.

12.0 Method Performance

12.1 Method Detection Limit Study (MDL)

Perform a method detection limit (MDL) study at initial method set-up following the procedures specified in laboratory SOP BR-QA-005,

12.2 Demonstration of Capabilities (DOC)

Perform a method demonstration of capability at initial set-up and when there is a significant change in instrumentation or procedure.

Each analyst that performs the analytical procedure must complete an initial demonstration of capability (IDOC) prior to independent analysis of client samples. Each analyst must demonstrate on-going proficiency (ODOC) annually thereafter. DOC procedures are further described in the laboratory's quality system manual (QAM) and in the laboratory SOP for employee training.

12.3 Training Requirements

Any employee that performs any portion of the procedure described in this SOP must have documentation in their employee training file that they have read this version of this SOP.

Instrument analysts, prior to independent analysis of client samples, must also have documentation of demonstration of initial proficiency (IDOC) and annual on-going proficiency (ODOC) in their employee training files.

13.0 Pollution Control

It is TestAmerica's policy to evaluate each method and look for opportunities to minimize waste generated (i.e., examine recycling options, ordering chemicals based on quantity needed, preparation of reagents based on anticipated usage and reagent stability). Employees must abide by the policies in Section 13 of the Corporate Safety Manual for "Waste Management and Pollution Prevention."

14.0 Waste Management

Waste management practices are conducted consistent with all applicable rules and regulations. Excess reagents, samples and method process wastes are disposed of in an accepted manner. Waste description rules and land disposal restrictions are followed. Waste disposal procedures are incorporated by reference to BR-EH-001 *Hazardous Waste*.

The following waste streams are produced when this method is carried out:

- None

15.0 References / Cross-References

- EPA Compendium Method TO-15, "Determination of Volatile Organic Compounds in Ambient Air using Specially Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry", US EPA, January, 1999.
- USEPA Compendium Method TO-3 "Method for the Determination of Volatile Organic Compounds In Ambient Air Using Cryogenic Pre Concentration Techniques and Gas Chromatography with Flame Ionization and Electron Capture Detection", USEPA, April 1984
- New Jersey Department of Environmental Protection Site Remediation Program Vapor Intrusion Technical Guidance, Version 3.1, March 2013.
- Laboratory SOP BR-QA-005, Procedures for the Determination of Limits of Detection (LOD), Limits of Quantitation (LOQ) and Reporting Limits (RL).
- Laboratory SOP BR-QA-011 Employee Training
- Laboratory SOP BR-EH-001 Hazardous Waste
- Laboratory SOP BR-QA-014 Laboratory Records
- Laboratory SOP BR-SM-001 Sample Management
- Laboratory Quality Assurance Manual (QAM)
- Corporate SOP CA-Q-S-002 *Manual Integration Practices*

16.0 Method Modifications

- This SOP utilizes an alternative detector (mass spectrometer) vs that of a FID and/or ECD as listed in the published method.
- This SOP describes a method where an aliquot of a whole air sample collected in a passivated

stainless steel canister is cryogenically trapped and concentrated prior to injection into the MS detector equipped GC.

- This Method SOP utilizes an RTX-624 capillary column (60M x 0.32 mm ID x 0.18 μ m).
- Additional quality control aspects are employed in the use of this method based on the alternative detector type, specifically, the detector tune is verified at the beginning of each period of analysis prior to the acquisition on any standard, blank, QC sample or field sample.
- This Method SOP does not utilize sub ambient column oven temperature programming.
- Sample traps consist of a multi bed system employing Tenax and glass beads (see manufactures system description: Entech Model 7100 Sample pre Concentrator).
- Sampling apparatus consists of passivated stainless steel canister specifically design for the collection of ambient air samples for volatile analysis
- Nafion dryers are not used. The analytical pre-concentration system employs a moisture control system consisting of multi sorbent bed traps.
- System calibration is verified every 24 hour within which samples are analyzed. System linearity is not verified every 4-6 hours as described.
- Published Method requires weekly multi-point calibration be performed. Laboratory performs multi-point calibrations as necessary see section 10.2
- System linearity is determined through multi point calibration utilizing average response factors and internal standard technique quantification (see Section 10).

17.0 Attachments

- Table 1A: Target Compound List, RL, Internal Standard and Ion Assignments for TO15
- Table 1B: Target Compound List, RL, Internal Standard and Ion Assignments for TO13
- Table 2: Ion Abundance Criteria (BFB)
- Table 3: QC Summary & Recommended Corrective Action
- Table 4: LCS Control Limits
- Appendix A: Terms and Definitions
- Appendix B: Standard Preparation Tables
- Appendix C: DoD QSM LCS and MS/MSD Limits

18.0 Revision History

BR-AT-004r12.0

Title Page: Updated copyright date and signatories.

Throughout: Removed Zero Air and replaced with Nitrogen Gas.

Throughout: Removed references to TO14 (no longer performed)

Throughout: Added TO3 requirements and verbiage

Throughout: Added DoD QSM5.1 requirements

Section 18: removed older history and added statement that previous revisions are retained.

Previous revisions are retained by the QA department.

Table 1A: Routine Compound List, Reporting Limit, Internal Standard and Ion Assignments

Analyte	CAS No.	6L RL (ppbv)	1L RL (ppbv)	Quantifier Mass	Qualifier Mass	Qualifier Mass	ISTD Group	Analyte Group
Dichlorodifluoromethane	75-71-8	0.5	5	85	87		1	B
Freon-22	75-45-6	0.5	5	51	67	69	1	B
1,2-Dichlorotetrafluoroethane	76-14-2	0.2	2	85	135	87	1	A
Chloromethane	74-87-3	0.5	5	50	52		1	B
n-Butane	106-97-8	0.5	5	43	41	58	1	B
Vinyl Chloride	75-01-4	0.04	0.40	62	64		1	D
1,3-Butadiene	106-99-0	0.04	5	54			1	D
Bromomethane	74-83-9	0.2	2	94	96		1	A
Chloroethane	75-00-3	0.5	5	64	66		1	B
Isopentane	78-78-4	0.2	2	43	57	56	1	A
Bromoethene (Vinyl Bromide)	593-60-2	0.2	2	106	108	81	1	A
Trichlorofluoromethane	75-69-4	0.2	2	101	103		1	A
Pentane	109-66-0	0.5	5	43	57	72	1	B
Ethyl Ether	60-29-7	0.2	2	59	45	74	1	A
Acrolein	107-02-8	5	50	56	55	37	1	C
Freon TF	76-13-1	0.2	2	101	151	103	1	A
1,1-Dichloroethene	75-35-4	0.2	2	96	61	63	1	A
Acetone	67-64-1	5	50	43	58		1	C
Isopropyl Alcohol	67-63-0	5	50	45	43		1	C
Carbon Disulfide	75-15-0	0.5	5	76			1	B
3-Chloropropene (Allyl Chloride)	107-05-1	0.5	5	41	76		1	B
Acetonitrile	75-05-8	5	50	41	40	39	1	C
Methylene Chloride	75-09-2	0.5	5	49	84	86	1	B
tert-Butyl Alcohol	75-65-0	5	50	59	41	43	1	C
Methyl tert-Butyl Ether	1634-04-4	0.5	5	73	43		1	B
trans-1,2-Dichloroethene	156-60-5	0.2	2	61	96		1	A
n-Hexane	110-54-3	0.5	5	57	86		1	B
1,1-Dichloroethane	75-34-3	0.2	2	63	65	83	1	A
Methyl Ethyl Ketone	78-93-3	0.5	5	72	43		1	B
cis-1,2-Dichloroethene	156-59-2	0.2	2	96	98		1	A
Tetrahydrofuran	109-99-9	5	50	42	72		2	C
Chloroform	67-66-3	0.2	2	83	85		1	A
1,1,1-Trichloroethane	71-55-6	0.2	2	97	99	61	2	A
Cyclohexane	110-82-7	0.2	2	84	56		2	A
Carbon Tetrachloride	56-23-5	0.04	2	117	119		2	D
2,2,4-Trimethylpentane	540-84-1	0.2	2	57	41	43	2	A
1,2-Dichloroethene (total)	540-59-0	0.2	2	61	96		1	A
Benzene	71-43-2	0.2	2	78	77		2	A
1,2-Dichloroethane	107-06-2	0.2	2	62	98		2	A
n-Heptane	142-82-5	0.2	2	43	71		2	A
Trichloroethene	79-01-6	0.04	0.40	95	130	132	2	D
Methyl Methacrylate	80-62-6	0.5	5	69	41	39	2	B
1,2-Dichloropropane	78-87-5	0.2	2	63	41		2	A
1,4-Dioxane	123-91-1	5	50	88	58		2	C

Analyte	CAS No.	6L RL (ppbv)	1L RL (ppbv)	Quantifier Mass	Qualifier Mass	Qualifier Mass	ISTD Group	Analyte Group
Dibromomethane	74-95-3	0.2	2	174	93	172	2	A
Bromodichloromethane	75-27-4	0.2	2	83	85		2	A
cis-1,3-Dichloropropene	10061-01-5	0.2	2	75	110		2	A
Methyl Isobutyl Ketone	108-10-1	0.5	5	43	58		2	B
n-Octane	111-65-9	0.2	2	43	57	114	2	A
Toluene	108-88-3	0.2	2	92	91		3	A
trans-1,3-Dichloropropene	10061-02-6	0.2	2	75	110		2	A
1,1,2-Trichloroethane	79-00-5	0.2	2	83	97	85	3	A
Tetrachloroethene	127-18-4	0.04	0.40	166	168	129	3	D
Methyl Butyl Ketone	591-78-6	0.5	5	43	58		3	B
Dibromochloromethane	124-48-1	0.2	2	129	127		3	A
1,2-Dibromoethane	106-93-4	0.2	2	107	109		3	A
Nonane	111-84-2	0.2	2	57	71	128	3	A
Chlorobenzene	108-90-7	0.2	2	112	77	114	3	A
Ethylbenzene	100-41-4	0.2	2	91	106		3	A
Xylene (m,p)	1330-20-7	0.5	5	106	91		3	A
Xylene (o)	95-47-6	0.2	2	106	91		3	A
Styrene	100-42-5	0.2	2	104	78		3	A
Bromoform	75-25-2	0.2	2	173	175	171	3	A
Cumene	98-82-8	0.2	2	105	120	77	3	A
1,1,2,2-Tetrachloroethane	79-34-5	0.2	2	83	131	85	3	A
Xylene (total)	1330-20-7	0.2	2	106	91		3	A
n-Decane	124-18-5	0.5	5	57	71	142	3	B
n-Propylbenzene	103-65-1	0.2	2	91	120	92	3	A
1,2,3-Trichloropropane	96-18-4	0.5	5	75	110	112	3	B
4-Ethyltoluene	622-96-8	0.2	2	105	120		3	A
1,3,5-Trimethylbenzene	108-67-8	0.2	2	105	120		3	A
2-Chlorotoluene	95-49-8	0.2	2	91	63		3	A
tert-Butylbenzene	98-06-6	0.2	2	119	91	134	3	A
1,2,4-Trimethylbenzene	95-63-6	0.2	2	105	120		3	A
sec-Butylbenzene	135-98-8	0.2	2	105	134	91	3	A
4-Isopropyltoluene	99-87-6	0.2	2	119	134	91	3	A
1,3-Dichlorobenzene	541-73-1	0.2	2	146	111	148	3	A
1,4-Dichlorobenzene	106-46-7	0.2	2	146	111	148	3	A
n-Undecane	1120-21-4	5	50	57	71	156	3	C
Benzyl Chloride	100-44-7	0.2	2	91	126	65	3	A
n-Butylbenzene	104-51-8	0.2	2	91	134	92	3	A
1,2-Dichlorobenzene	95-50-1	0.2	2	146	111	148	3	A
n-Dodecane	112-40-3	5	50	57	71	170	3	C
1,2,4-Trichlorobenzene	120-82-1	0.5	5	180	182		3	B
1,3-Hexachlorobutadiene	87-68-3	0.2	2	225	223		3	A
Naphthalene	91-20-3	0.5	5	128			3	B
1,2,3-Trichlorobenzene	87-61-6	0.2	2	180	182	145	3	A
Propylene	115-07-1	5	50	41	42	39	1	C
Vinyl Acetate	108-05-4	5	50	43	86		1	C

Analyte	CAS No.	6L RL (ppbv)	1L RL (ppbv)	Quantifier Mass	Qualifier Mass	Qualifier Mass	ISTD Group	Analyte Group
Ethyl Acetate	141-78-6	5	50	43	74		1	C
Ethanol	64-17-5	5	50	46	45		1	E
Bromochloromethane	74-97-5	NA	NA	128	49	130	1	NA
1,4-Difluorobenzene	540-36-3	NA	NA	114			2	NA
Chlorobenzene-d5	3114-55-4	NA	NA	117			3	NA

Table 1B: TO-3 Analyte List, Reporting Limit, Internal Standard and Ion Assignments

Analyte	CAS No.	RL (ppbv)	Qualifier Ion	Qualifier Ion	Qualifier Ion	ISTD Group
n-Octane	111-65-9	0.2	43	57	114	2
Toluene	108-88-3	0.2	92	91		3
TVOC as Toluene	NA	11				NA
GRO as Octane	NA	14				NA
Total Hydrocarbons	NA	76 ug/m3				NA
Internal Standards						
Bromochloromethane	74-97-5	NA	128	49	130	1
1,4-Difluorobenzene	540-36-3	NA	114			2
Chlorobenzene-d5	3114-55-4	NA	117			3

Table 2: Tune Standard Criteria

Mass	Ion Abundance Criteria
50	8.0 to 40.0 percent of mass 95
75	30.0 to 66.0 percent of mass 95
95	Base Peak, 100 percent relative abundance
96	5.0 to 9.0 percent of mass 95
173	Less than 2.0 percent of mass 174
174	50.0 to 120.0 percent of mass 95
175	4.0 to 9.0 percent of mass 174
176	93.0 to 101.0 percent of mass 174
177	5.0 to 9.0 percent of mass 176

Table 3: TO15 QC Summary & Recommended Corrective Action (Routine and DoD)

QC Check	Frequency	Acceptance Criteria	Recommended Corrective Action
Tune Standard	Prior to calibration and every 24 hours	See Table 2	Correct Problem. Reanalyze. No samples may be analyzed without a valid tune.
ICAL	Prior to sample analysis and when CCV fails	RSD for each analyte $\leq 30\%$ with 2 exceptions up to 40%	Correct problem and repeat calibration
ICV	Once after each ICAL	%R for all analytes within 70-130	Correct Problem. Reanalyze, re-make, re-verify & re-analyze. If that fails, re-make all standards and repeat calibration.
Retention Time Window	Once per ICAL	NA	NA
RRT	With each sample	RRT of each target analyte in each calibration standard within ± 0.06 RRT units.	Correct Problem. Repeat ICAL
CCV	Daily before sample analysis after tune standard	%D ≤ 30	Correct Problem. Reanalyze once. If that fails, see section 10.2.5 for instruction.
Closing CCV	At the end of the analytical sequence, within 24 hours of opening tune acquisition.	%D ≤ 30	Immediately analyze two additional consecutive CCVs. If both pass, samples may be reported without reanalysis. If either fails or if two consecutive CCVs cannot be run, perform corrective action(s) until a passing CCV is attained, and then reanalyze all associated samples since last acceptable CCV. If necessary, perform a new initial calibration and then reanalyze all associated samples since the last acceptable CCV. If reanalysis cannot be performed, data must be qualified and explained in the Case Narrative. With client permission, closing CCV criteria of 50% can be utilized.
LCS	Each batch or every 20 samples, whichever is sooner.	Routine: %R for all analytes by statistically generated limits. See Table 4. DoD: %R for all analytes by QSM 5.1 limits, see Appendix C.	Reanalyze LCS or re-prepare and reanalyze LCS and all associated samples if sufficient sample volume is available. If corrective action not successful, initiate nonconformance report and qualify sample results.
LCSD	Per Client Request	RPD ≤ 25	Reanalyze LCSD or re-prepare and reanalyze LCSD and all associated samples if sufficient sample volume is available. If corrective action is not successful, initiate nonconformance report and qualify sample results.
Method Blank	Each batch or every 20 samples, whichever is sooner.	No analytes detected above RL	Reanalyze along with associated samples, unless detects for same compounds found in blank are greater than 10X the concentration found in the blank.
Internal Standard	All standards, field and QC samples	+/- 40% area response from last acceptable calibration. RT +/- 0.33 min (20 seconds) from last acceptable calibration.	Inspect system for malfunction. Reanalyze samples. Qualify data.
Sample Duplicate	Per Client Request	RPD ≤ 25 when one or both results are greater than five times the RL.	Consult with PM. Reanalyze or qualify data.

Table 4: In-house LCS limits*

Analyte	In-House Limits %R	RPD
1,1,1-Trichloroethane	70 - 130	25%
1,1,2,2-Tetrachloroethane	70 - 130	25%
1,1,2-Trichloro-1,2,2-trifluoroethane	70 - 130	25%
1,1,2-Trichloroethane	70 - 130	25%
1,1-Dichloroethane	70 - 130	25%
1,1-Dichloroethene	70 - 130	25%
1,2,3-Trichlorobenzene	55 - 130	25%
1,2,3-Trichloropropane	70 - 130	25%
1,2,4-Trichlorobenzene	62 - 130	25%
1,2,4-Trimethylbenzene	70 - 130	25%
1,2-Dichloro-1,1,2,2-tetrafluoroethane	70 - 136	25%
1,2-Dichlorobenzene	70 - 130	25%
1,2-Dichloroethane	70 - 130	25%
1,2-Dichloropropane	70 - 130	25%
1,3,5-Trimethylbenzene	70 - 130	25%
1,3-Dichlorobenzene	70 - 130	25%
1,4-Dichlorobenzene	70 - 130	25%
1,4-Dioxane	70 - 130	25%
2-Butanone (MEK)	70 - 130	25%
2-Chlorotoluene	70 - 130	25%
2-Hexanone	66 - 131	25%
2-Methyl-2-propanol	61 - 130	25%
2-Methylbutane	58 - 150	25%
3-Chloro-1-propene	54 - 140	25%
4-Ethyltoluene	70 - 130	25%
4-Isopropyltoluene	70 - 130	25%
4-Methyl-2-pentanone (MIBK)	66 - 132	25%
Acetone	66 - 138	25%
Acetonitrile	57 - 150	25%
Acrolein	70 - 150	25%
Acrylonitrile	64 - 144	25%
Alpha Methyl Styrene	70 - 130	25%
Benzene	70 - 130	25%
Benzyl chloride	70 - 135	25%
Bromoform	66 - 150	25%
Bromomethane	70 - 130	25%
Butadiene	59 - 132	25%
Butane	56 - 141	25%
Carbon disulfide	70 - 143	25%
Carbon tetrachloride	68 - 132	25%
Chlorobenzene	70 - 130	25%
Chlorodibromomethane	70 - 130	25%
Chlorodifluoromethane	68 - 131	25%
Chloroethane	62 - 136	25%
Chloroform	70 - 130	25%

Chloromethane	58 - 133	25%
cis-1,2-Dichloroethene	70 - 130	25%
cis-1,3-Dichloropropene	70 - 130	25%
Cyclohexane	70 - 130	25%
Dibromomethane	70 - 130	25%
Dichlorobromomethane	70 - 130	25%
Dichlorodifluoromethane	70 - 130	25%
Dodecane	66 - 142	25%
Ethanol	59 - 140	25%
Ethyl acetate	70 - 131	25%
Ethyl ether	70 - 148	25%
Ethylbenzene	70 - 130	25%
Ethylene Dibromide	70 - 130	25%
Hexachlorobutadiene	69 - 130	25%
Hexane	70 - 130	25%
Isooctane	70 - 130	25%
Isopropyl alcohol	51 - 130	25%
Isopropylbenzene	70 - 130	25%
Methyl methacrylate	70 - 130	25%
Methyl tert-butyl ether	70 - 130	25%
Methylene Chloride	62 - 131	25%
m-Xylene & p-Xylene	70 - 130	25%
Naphthalene	52 - 130	25%
n-Butanol	68 - 130	25%
n-Butylbenzene	70 - 130	25%
n-Decane	70 - 131	25%
n-Heptane	69 - 130	25%
n-Nonane	70 - 130	25%
n-Octane	70 - 130	25%
N-Propylbenzene	70 - 130	25%
o-Xylene	70 - 130	25%
Pentane	60 - 150	25%
Propene	61 - 136	25%
sec-Butylbenzene	70 - 130	25%
Styrene	70 - 130	25%
tert-Butylbenzene	70 - 130	25%
Tetrachloroethene	70 - 130	25%
Tetrahydrofuran	61 - 140	25%
Toluene	70 - 130	25%
trans-1,2-Dichloroethene	70 - 130	25%
trans-1,3-Dichloropropene	70 - 130	25%
Trichloroethene	70 - 130	25%
Trichlorofluoromethane	70 - 130	25%
Undecane	66 - 134	25%
Vinyl acetate	62 - 141	25%
Vinyl bromide	70 - 130	25%
Vinyl Chloride	62-130	25%

TPH GRO as Octane	70 - 130	25%
TVOC as Toluene	70 - 130	25%
Total Hydrocarbons.	60-140	25%

*The limits in this table are those in effect as of the published date of this SOP. These limits are based on historical data and are subject to change. Current in-house limits are populated in the LIMS database. Contact a laboratory representative for the most current set of limits. Limit Ref: 2012CC3

Appendix A: Terms and Definitions

Acceptance Criteria: Specified limits placed on characteristics of an item, process or service defined in requirement documents.

Accuracy: The degree of agreement between an observed value and an accepted reference value. Accuracy includes a combination of random error (precision) and systematic error (bias) components which are due to sampling and analytical operations; a data quality indicator.

Analyte: The specific chemicals or components for which a sample is analyzed. (EPA Risk Assessment Guide for Superfund, OSHA Glossary).

Batch: Environmental samples that are prepared and/or analyzed together with the same process, using the same lot(s) of reagents. A preparation/digestion batch is composed of one to 20 environmental samples of similar matrix, meeting the above criteria. An analytical batch is composed of prepared environmental samples (extracts, digestates and concentrates), which are analyzed together as a group.

Calibration: a set of operations that establish, under specified conditions, the relationship between values of quantities indicated by a measuring instrument or measuring system, or values represented by a material measure or a reference material and the corresponding values realized by the standards.

Calibration Curve: the graphical relationship between the known values or a series of calibration standards and their instrument response.

Calibration Standard: A substance or reference used to calibrate an instrument.

Continuing Calibration Verification (CCV): An analytical standard gas mixture containing all target analytes and internal standard compounds that is used to evaluate the performance of the instrument system with respect to a defined set of method criteria.

Corrective Action: the action taken to eliminate the cause of an existing nonconformity, defect or other undesirable occurrence in order to prevent recurrence.

Cryogen: A refrigerant used to obtain very low temperatures in the cryogenic trap of the analytical system. A typical cryogen is liquid nitrogen (bp -195.8°C) or liquid argon (bp -185.7°C).

Demonstration of Capability (DOC): procedure to establish the ability to generate acceptable accuracy and precision.

Holding Time: the maximum time that a sample may be held before preparation and/or analysis as promulgated by regulation or as specified in a test method.

Initial Calibration: Analysis of analytical standards for a series of different specified concentrations used to define the quantitative response, linearity and dynamic range of the instrument to target analytes.

Initial Calibration Verification (ICV): An analytical standard mixture containing all target analytes and internal standard compounds that are prepared from a source independent of the source of the initial calibration standards. The purpose of the ICV is to verify that the initial calibration is in control.

Intermediate Standard: a solution made from one or more stock standards at a concentration between the stock and working standard. Intermediate standards may be certified stock standard solutions purchased from a vendor and are also known as secondary standards.

Internal Standards (IS): Non-target analytes that are similar to the target analytes but are not expected to be found in environmental media (generally, isotopically labeled target analytes are used for this purpose). IS are added to every standard, quality control sample, and field sample at a known concentration prior to analysis. IS responses are used as the basis for quantitation of target analytes.

Laboratory Control Sample (LCS) – A QC sample of known composition spiked with analytes of interest. The LCS evaluates method performance and ability to successfully recover target analytes from a clean matrix. LCS recovery is typically expressed as percent recovery and provides a measure of accuracy. A LCSD is a duplicate LCS prepared and analyzed from a separate canister to provide a measure of replicate precision.

Method Blank (MB): A canister of humidified ultra pure zero air that is treated exactly as a sample. The MBLK is used to determine if method analytes or other interferences are present in the laboratory environment, the reagents, or the apparatus.

Method Detection Limit (MDL): the minimum amount of a substance that can be measured with a specified degree of confidence that the amount is greater than zero using a specific measurement system. The MDL is a statistical estimation at a specified confidence interval of the concentration at which relative uncertainty is $\pm 100\%$. The MDL represents a range where qualitative detection occurs. Quantitative results are not produced in this range.

Non-conformance: an indication, judgment, or state of not having met the requirements of the relevant specification, contract or regulation.

Precision: the degree to which a set of observations or measurements of the same property, obtained under similar conditions, conform to themselves.

Quality Control Sample (QC): a sample used to assess the performance of all or a portion of the measurement system.

Reporting Limit (RL): the level to which data is reported for a specific test method and/or sample.

Stock Gas Mixture: A Commercially purchased concentrated gas mixture containing one or more method analytes

Appendix B: Standard Preparation Tables

The standard formulations contained in this appendix are recommended and are subject to change. If the concentration or volume of any of the stock standard changes, the standard preparation instructions must be adjusted accordingly. See laboratory SOP BR-QA-002 *Standard Preparation* for further guidance on the preparation of standard solutions.

Prepare all standards using the McMillan Company 80SD mass flow controller. Prepare the standard in zero air, demonstrated to be analyte free. Store the standard at ambient temperature. Unless otherwise specified, assign an expiration date of 30 days from date of preparation unless the parent standard expires earlier, in which case, use the earliest expiration date.

Intermediate Calibration Standard

Parent Standard	Vendor	Stock Standard Concentration (ppmv)	Volume Added (mL)	Final Volume (L)	Final Concentration (ppbv)
Custom Calibration Stock Standard	Spectra Gases Custom Made	1.0	7500	37.5	200

Prepare in 15 L Summa Canister Expiration Period 3months
This standard contains all the target analytes listed in table 1.

Working Calibration Standards

Parent Standard	Calibration Standard	Parent Standard Concentration (ppbv)	Volume Added (mL)	Final Volume (L)	Final Concentration (ppbv)
Cal Standard 20 ppbv	Cal Standard 0.2 ppbv	20	155	15.46	0.2
Cal Standard 20 ppbv	Cal Standard 0.5 ppbv	20	386	15.46	0.5
Intermediate Calibration Standard	Cal Standard 5 ppbv	200	386	15.46	5
Intermediate Calibration Standard	Cal Standard 10 ppbv	200	773	15.46	10
Intermediate Calibration Standard	Cal Standard 15 ppbv	200	1160	15.46	15
Intermediate Calibration Standard	Cal Standard 20 ppbv	200	1546	15.46	20
Intermediate Calibration Standard	Cal Standard 40 ppbv	200	3092	15.46	40

Prepare in 6 L Summa Canister Expiration Period 3 months
Each calibration standard contains all the analytes listed in table 1 at the above concentrations.

Intermediate ICV/LCS Standard

Parent Standard	Vendor	Stock Standard Concentration (ppmv)	Volume Added (mL)	Final Volume (L)	Final Concentration (ppbv)
ICV Stock Standard	Spectra Gases Custom Made	1.0	7500	37.5	200

Prepare in 15L Summa Canister Expiration period 3 months
This standard contains all target analytes listed in table 1.

Working ICV/LCS Standard

Parent Standard	Calibration Standard	Stock Standard Concentration (ppbv)	Volume Added (mL)	Final Volume (L)	Final Concentration (ppbv)
Intermediate ICV/LCS Standard	ICV Standard 10 ppbv	200	773	15.46	10

Prepare in 6L Summa Canister Expiration period 3 months
This standard contains all target analytes listed in table 1.

Initial Calibration Levels

Calibration Level	Working Calibration Standard	Volume Analyzed (mL)	Concentration on Column (ppbv)
Calibration Level 1	Cal Standard 0.2 ppbv	40	0.04
Calibration Level 2	Cal Standard 0.2 ppbv	200	0.2
Calibration Level 3	Cal Standard 0.5 ppbv	200	0.5
Calibration Level 4	Cal Standard 5 ppbv	200	5
Calibration Level 5	Cal Standard 10 ppbv	200	10
Calibration Level 6	Cal Standard 15 ppbv	200	15
Calibration Level 7	Cal Standard 20 ppbv	200	20
Calibration Level 8	Cal Standard 40 ppbv	200	40
ICV	Intermediate ICV 10ppb	200	10

Prepare in 6L Summa Canister

Intermediate Ethanol Calibration Standard at 500ppbv/v

- 1) Fill a 44 ml VOA vial with VOA free water. Remove 197ul of water from the vial.
- 2) Add 197 ul of >99.5% Ethanol neat material
- 3) Cap and shake/roll vial for 1 minute
- 4) Inject 10ul of the prepared water/ethanol mix into a fully evacuated 15 liter summa canister
- 5) Pump the syringe plunger 5 times to insure complete transfer of material
- 6) Immediately fill the canister to 22 psig with zero air.

Calibration Level	Working Calibration Standard	Volume added (mL)	Concentration on Column (ppbv)
Calibration Level 1	Cal Standard 0.5 ppbv	124	5
Calibration Level 2	Cal Standard 5.0 ppbv	309	10
Calibration Level 3	Cal Standard 10ppbv	464	15
Calibration Level 4	Cal Standard 15 ppbv	618	20
Calibration Level 5	Cal Standard 20 ppbv	1237	40
Calibration Level 6	Cal Standard 40 ppbv	3092	100

Appendix C: DOD QSM 5.1 LCS Limits

Analytes	CAS #	Lower Limit	Upper Limit	Units
Propene	115-07-1	57	136	%
Dichlorodifluoromethane	75-71-8	59	128	%
Chlorodifluoromethane	75-45-6	59	145	%
1,2-Dichloro-1,1,2,2-tetrafluoroethane	76-14-2	63	121	%
Chloromethane	74-87-3	59	132	%
Butane	106-97-8	64	129	%
Vinyl chloride	75-01-4	64	127	%
Butadiene	106-99-0	66	134	%
Bromomethane	74-83-9	63	134	%
Chloroethane	75-00-3	63	127	%
Vinyl bromide	593-60-2	71	126	%
Trichlorofluoromethane	75-69-4	62	126	%
Ethanol	64-17-5	59	125	%
1,1,2-Trichloro-1,2,2-trifluoroethane	76-13-1	66	126	%
1,1-Dichloroethene	75-35-4	61	133	%
Acetone	67-64-1	58	128	%
Isopropyl alcohol	67-63-0	52	125	%
Carbon disulfide	75-15-0	57	134	%
3-Chloro-1-propene	107-05-1	71	131	%
Methylene Chloride	75-09-2	62	115	%
2-Methyl-2-propanol	75-65-0	24	150	%
Methyl tert-butyl ether	1634-04-4	66	126	%
trans-1,2-Dichloroethene	156-60-5	67	124	%
Hexane	110-54-3	63	120	%
1,1-Dichloroethane	75-34-3	68	126	%
Vinyl acetate	108-05-4	56	139	%
Ethyl acetate	141-78-6	65	128	%
2-Butanone (MEK)	78-93-3	67	130	%
cis-1,2-Dichloroethene	156-59-2	70	121	%
Chloroform	67-66-3	68	123	%
Tetrahydrofuran	109-99-9	64	123	%
1,1,1-Trichloroethane	71-55-6	68	125	%
Cyclohexane	110-82-7	70	117	%
Carbon tetrachloride	56-23-5	68	132	%
Isooctane	540-84-1	68	121	%
Benzene	71-43-2	69	119	%

1,2-Dichloroethane	107-06-2	65	128	%
n-Heptane	142-82-5	69	123	%
Trichloroethene	79-01-6	71	123	%
Methyl methacrylate	80-62-6	70	128	%
1,2-Dichloropropane	78-87-5	69	123	%
1,4-Dioxane	123-91-1	71	122	%
Dichlorobromomethane	75-27-4	72	128	%
cis-1,3-Dichloropropene	10061-01-5	70	128	%
4-Methyl-2-pentanone (MIBK)	108-10-1	67	130	%
Toluene	108-88-3	66	119	%
trans-1,3-Dichloropropene	10061-02-6	75	133	%
1,1,2-Trichloroethane	79-00-5	73	119	%
Tetrachloroethene	127-18-4	66	124	%
2-Hexanone	591-78-6	62	128	%
Chlorodibromomethane	124-48-1	70	130	%
Ethylene Dibromide	106-93-4	74	122	%
Chlorobenzene	108-90-7	70	119	%
Ethylbenzene	100-41-4	70	124	%
m-Xylene & p-Xylene	179601-23-1	61	134	%
o-Xylene	95-47-6	67	125	%
Styrene	100-42-5	73	127	%
Bromoform	75-25-2	66	139	%
Isopropylbenzene	98-82-8	68	124	%
1,1,2,2-Tetrachloroethane	79-34-5	65	127	%
N-Propylbenzene	103-65-1	69	123	%
2-Chlorotoluene	95-49-8	74	130	%
tert-Butylbenzene	98-06-6	65	124	%
1,2,4-Trimethylbenzene	95-63-6	66	132	%
sec-Butylbenzene	135-98-8	68	125	%
4-Isopropyltoluene	99-87-6	67	130	%
1,3-Dichlorobenzene	541-73-1	65	130	%
1,4-Dichlorobenzene	106-46-7	60	131	%
Benzyl chloride	100-44-7	50	147	%
n-Butylbenzene	104-51-8	66	130	%
1,2-Dichlorobenzene	95-50-1	63	129	%
1,2,4-Trichlorobenzene	120-82-1	55	142	%

Hexachlorobutadiene	87-68-3	56	138	%
Naphthalene	91-20-3	57	138	%
1,2,3-Trichloropropane	96-18-4	76	124	%
Acetonitrile	75-05-8	63	132	%
Acrolein	107-02-8	62	126	%
n-Decane	124-18-5	70	118	%
n-Nonane	111-84-2	63	128	%
n-Octane	111-65-9	69	121	%
Dodecane	112-40-3	62	147	%
Undecane	1120-21-4	69	123	%
Pentane	109-66-0	63	131	%
Acrylonitrile	107-13-1	71	137	%
Alpha Methyl Styrene	98-83-9	67	128	%
n-Butanol	71-36-3	62	133	%

ATTACHMENT B

Chain of Custody Form



702 Electronic Drive Phone: 215-355-3900
Horsham, PA 19044-0962 Fax: 215-355-7231

Client/Acct. No. _____
Address _____
City/State/Zip _____
Phone/Fax _____
Client Contact: _____

CHAIN OF CUSTODY
Page ____ of ____

Bill to/Report to (if different)

Sampling Site Address (if different) Include State

P.O. No.

PWSID #:

Quote #

e-mail:

Lab LIMS No:

LAB USE ONLY:

____ Ascorbic/HCL Vials # ____ HCl Vials

____ Na₂S₂O₃ _____

____ Na OH/Zn acetate pH _____

____ HNO₃ pH _____

____ H₂SO₄ pH _____

____ NaOH pH _____

____ Unpreserved

____ HCl # ____ NH₄Cl # ____ MeOH

____ DI Water

ANALYSIS REQUESTED

MATRIX CODES

DW: DRINKING WATER

GW: GROUND WATER

WW: WASTEWATER

SO: SOIL

SL: SLUDGE

OIL: OIL

SOL: NON SOIL SOLID

MI: MISCELLANEOUS

X: OTHER

Field pH, Temp (°C),
DO, Cl₂, Cond. etc.

LAB USE ONLY	PROJECT	Collection		G R A B	C O M P	Matrix Code	Number of Containers									
	FIELD ID	Date	Military Time				Total	H 2 S O 4	H C l	V i a l s	H N O 3	N a O H	Z n A c	U N P R E	B A C T	

SAMPLED BY: (Name/Company)	TAT: <input type="checkbox"/> STANDARD (10 DAY)	Report Format: <input type="checkbox"/> Standard <input type="checkbox"/> NJ-RDD <input type="checkbox"/> SRP-RDD <input type="checkbox"/> Standard + QC <input type="checkbox"/> Forms <input type="checkbox"/> EDD	Field Parameters Analyzed By:	
	or DUE DATE ____/____/____		Initials	Date/Time:
	Please call for pricing and availability for rush (<10 day) turnaround and for all but standard reporting format.			

SAMPLE CUSTODY EXCHANGES MUST BE DOCUMENTED BELOW. USE FULL LEGAL SIGNATURE, DATE AND MILITARY TIME (24 HOUR CLOCK, I.E. 8AM IS 0800, 4 PM IS 1600)

RELINQUISHED BY SAMPLER	DATE	TIME	RECEIVED BY	DATE	TIME	DELIVERY: <input type="checkbox"/> EQC COURIER <input type="checkbox"/> CLIENT <input type="checkbox"/> UPS <input type="checkbox"/> FEDEX <input type="checkbox"/> OTHER _____	Custody Seal Number
1.			1.			Rec'd Temp.: _____ Initials: _____ Ice Y / N Location: _____ COMMENTS: Hazardous: yes / no	
RELINQUISHED BY 2.	DATE	TIME	RECEIVED BY 2.	DATE	TIME		
RELINQUISHED BY 3.	DATE	TIME	RECEIVED BY 3.	DATE	TIME		
RELINQUISHED BY 4.	DATE	TIME	RECEIVED BY 4.	DATE	TIME		
RELINQUISHED BY 5.	DATE	TIME	RECEIVED BY 5.	DATE	TIME		

ATTACHMENT C

Resumes

ELIZABETH A. DENLY

EDUCATION

B.A., Chemistry, University of New Hampshire, 1987

PROFESSIONAL REGISTRATIONS /CERTIFICATIONS

Licensed Site Professional Association, Massachusetts, Associate Member

American Chemical Society (ACS)

American Society for Quality (ASQ)

AREAS OF EXPERTISE

Ms. Denly has 28 years of experience in:

- Quality Assurance/Quality Control
- Data Validation
- Laboratory Audits
- Gas Chromatography: Field and Laboratory Analyses
- Gas Chromatography/Mass Spectrometry: Field and Laboratory Analyses

Quality Assurance/Quality Control

As a QA chemist at TRC, Ms. Denly is responsible for providing QA/QC oversight in support of a variety of environmental investigations including contaminant ambient air monitoring, human health and ecological risk assessments, riskbased soil cleanups, remediation programs, and delineation. Ms. Denly has provided this oversight under different regulatory programs, including MassDEP, NYSDEC, NJDEP, and USEPA Region I, Region II, Region III, and Region V. In this role, she has been responsible for the preparation of the project-specific QAPP, coordination with the laboratory, selection of the appropriate analytical methodologies to achieve the desired state or regulatory standards, oversight and performance of the data validation process, and determination of the usability of the data in comparison to the overall project objectives.

In addition, Ms. Denly serves as TRC's Remediation and Building Science Practices Quality Assurance & Chemistry Systems Manager, responsible for the creation and implementation of the Sector's Quality Management Plan and Standard Operating Procedures (SOPs) for field sampling and documentation protocols. Ms. Denly also leads Quality Coordinator networks in the Remediation and Building Science Practices which are responsible for the development and communication of quality initiatives within the organization. Among the quality initiatives that have been implemented or created under Ms. Denly's leadership include the following:

- Procedures for Peer Review of Deliverables

- Tracking of Peer Review Documentation via monthly random audits
- Project Planning Checklist tool
- Analytical Data Review Checklist and Training
- Practice Self-Assessments with follow-up Corrective Actions
- Biweekly Quality Messaging
- Technical Editing Guidelines
- Publication of Quality Lessons Learned reports

Data Validation

Ms. Denly provides oversight and senior review on data validation performed for a variety of analytical parameters. She performs data validation for organic parameters including VOCs, SVOCs, Pesticides, PCB Aroclors, PCB homologues/congeners, Dioxins, specialty analyses including GC/MS/SIM and various air analyses. Validation and reporting guidelines utilized include USEPA National Functional Guidelines, USEPA Regions I through V, and NYSDEC DUSRs. Ms. Denly developed internal protocols for the validation of the MassDEP EPH/VPH methodologies.

With respect to references, serving as an in-house quality control and chemistry expert, Ms. Denly does not have extensive direct client contact.

REPRESENTATIVE EXPERIENCE (Descriptions marked with an asterisk (*) undertaken within past three years) New York City School Construction Authority*

Ms. Denly has provided quality assurance management for a variety of SCA programs, including PCB air monitoring, site investigations, and sub-slab soil vapor and indoor air investigations. In this role, Ms. Denly is responsible for reviewing field team documentation, providing oversight of the analytical laboratory, data validation, and preparation of DUSRs. She is responsible for frequent communication with the laboratories to ensure proper receipt of samples, proper utilization of project-specific analytical protocols in order to achieve necessary project action levels, and to monitor the overall performance of the laboratories.

Brownfields Programs – Various Locations*

Ms. Denly serves as the Project Quality Assurance Manager on TRC's Brownfields programs within USEPA Regions 1 and 3. In this role, she is responsible for maintaining and updating the USEPA-approved generic Brownfields QAPPs. She provides final review of site-specific QAPP addenda prepared for the individual Brownfields sites and assists in the determination of required analytical methodologies necessary to achieve specific project objectives. Ms. Denly is the point of contact for the field team and the laboratory during the investigations for issues related to the ultimate usability of the analytical data. She reviews the chains-of-custody as samples are received by the laboratory to ensure the

requirements for sample collection in the sitespecific QAPP addenda are followed and samples are properly logged into the laboratory. Final review of the analytical data is performed by Ms. Denly and a data usability assessment is generated for each investigation.

Vieques Island, Environmental Cleanup Oversight, Vieques, Puerto Rico* Ms. Denly provides technical and regulatory compliance oversight to the Commonwealth of Puerto Rico and the Puerto Rico Environmental Quality Board (EQB) regarding the investigation, assessment, and remediation of contamination on Vieques Island by the U.S. Navy in support of the property's transfer to the Commonwealth of Puerto Rico. Ms. Denly conducts technical and regulatory reviews pertaining to analytical methods and QA/QC issues of the documents prepared by Navy subcontractors including draft and final submissions of work plans, field sampling plans, investigation results, technical memoranda, feasibility studies, and remedial designs.

Massachusetts Department of Environmental Protection – MA*

Ms. Denly is currently providing assistance to MassDEP to determine whether the regulated community is correctly implementing analytical methodologies at MassDEP sites; this includes providing training for all MassDEP auditors. Ms. Denly is also assisting MassDEP in the development of a protocol for the analysis of volatile petroleum hydrocarbons (VPH) by GC/MS. Previously, Ms. Denly has assisted MassDEP in the review/evaluation of data packages for EPH/VPH analyses from laboratories selected by MassDEP as part of a Data Audit project to ensure compliance with the methods and CAM. She provided consultation to MassDEP for revisions to the MassDEP's innovative EPH/VPH analytical methods used to measure petroleum hydrocarbon concentrations in soil and groundwater. Ms. Denly served as a member of the Data Quality Enhancement Work Group led by MassDEP and assisted in the development of a policy for achieving consistency of data reported under the MCP. Ms. Denly was responsible for generating the framework for QC parameters on organic analyses typically utilized under the MCP, method-specific performance standards for these QC parameters, minimum reporting requirements for the laboratories for each method, and a list of what laboratories need to keep on file for potential audits by the MassDEP.

Mattiace Petrochemical Superfund Site – Glen Cove, NY*

Ms. Denly prepared the QAPP for the Long Term Remedial Action under TRC's Exit Strategy® program using USEPA Region II guidance. She provides QA oversight to the field team. Ms. Denly also performs data validation of data generated for demonstration of achievement of cleanup objectives. Ms. Denly is responsible for performing assessment of data to determine overall usability.

USEPA Region I Superfund RAC*

Ms. Denly serves as lead chemist for a variety of Superfund programs under the USEPA Region I Remedial Action Contract (RAC). Her responsibilities have included ongoing development of analytical specifications for laboratories to achieve specific project objectives and development of QAPPs following the requirements of USEPA Region I QAPP guidelines. She performs data validation and/or senior review of data validation for a variety of analytical methodologies utilizing USEPA Region I validation guidelines. Ms. Denly generates data usability assessments and/or split sample comparison reports in accordance with USEPA Region I guidance, when required. She interacts with USEPA Region I chemists in the selection of analytical methodologies and project objectives. Ms. Denly provides QA oversight of PRPs' validation reports, sampling and analysis plans, and QAPPs. She is also responsible for providing QA oversight to field teams, performing daily reviews of COCs and traffic reports, and acting as the main liaison between the field team and USEPA.

FAA, Region II – Atlantic City, NJ

Ms. Denly assisted in the preparation of QA protocols for the Supplemental RI and Ecological Risk Assessment Work Plan. She was also responsible for providing QA support to the field team. Ms. Denly interfaced with laboratories to ensure achievement of risk-based standards and performed data validation and/or oversight for all data generated. Ms. Denly provided oversight for all validation performed on the Remedial Investigation data.

Queens West Development – Stage 2 Site – Long Island City, NY

Ms. Denly prepared the QAPP for the NYSDEC Voluntary Cleanup Program under TRC's Exit Strategy® program. She provided QA oversight to the field team. Ms. Denly performed data validation for the program. She was responsible for performing assessment of data to determine overall usability. Ms. Denly provided daily support to the project team on chemistry, laboratory, and QA issues. She was responsible for ensuring project objectives were achieved by the laboratory and for oversight of laboratory QA issues.

Consolidated Edison First Avenue Properties – New York, NY

Ms. Denly prepared a QAPP for Supplemental Soil Investigation and Voluntary Cleanup of four sites under TRC's Exit Strategy® program. The First Avenue Properties Site is the site of a former Consolidated Edison Power Plant located in midtown Manhattan between East 38th Street and East 40th Street. Ms. Denly provided QA oversight to field team during site remediation. Ms. Denly performed data validation of select data points used for decision-making and was responsible for performing assessment of data to determine overall usability for various Remedial Work Plans.

130 Liberty Street – New York, NY

Ms. Denly developed the QAPP for the extensive ambient air monitoring program and waste management program under USEPA Region II oversight. Ms. Denly provided oversight of six analytical laboratories and was responsible for coordination and performance of data validation for asbestos, metals, dioxins/furans, PAHs, PCBs, and silica ambient air data as well as TCLP and metals waste characterization data. Ms. Denly communicated frequently with the laboratories to ensure proper receipt of samples, proper utilization of projectspecific analytical protocols and to monitor the overall performance of the laboratories. Responsible for the oversight and performance of field and laboratory audits. Reviewed all data prior to web-site posting and submission to USEPA.

PUBLICATIONS AND PRESENTATIONS

Denly, E., "LOQ, LOD, DL, RL, QL, SQL, MDL, PQL: What the "L"?" Presented at Thirty-first Annual International Conference on Soils, Sediments, Waters, and Energy, Amherst, MA. 2015.

Denly, E. Chapnick, S., "Is Presumptive Certainty Generating Usable Data for Massachusetts Contingency Plan (MCP) Decisions?" Paper presented at Twentieth Annual Conference on Contaminated Soils, Sediments and Waters, Amherst, MA. 2004.

Denly, E., Hoyt, M., Anastas, N., Fitzgerald, J., Hutcheson, M., McGrath, T., "Massachusetts VPH Method Validation for Indoor Air Samples". Poster presented at Thirteenth Annual Conference on Contaminated Soils, Amherst, MA. 1998.

Denly, E. Hopper, D., "Field Chemistry for PAHs and VOCs Applied to a RiskBased Soil Cleanup at a Landfill", Paper presented at Fifth International Symposium on Field Analytical Methods for Hazardous Wastes and Toxic Chemicals, Las Vegas, NV. 1997.

Denly, E., Hoyt, M., Camp, W.H., Naughton, G., "Method Validation Study for Field Screening of Dielectric Fluids in Soils", Paper presented at Twelfth Annual Conference on Contaminated Soils, Amherst, MA. 1997.

Denly, E., Wang, H., "Preparation of Tedlar Bag Whole Air Standards with a SUMMA Canister for Field VOC Analysis", Poster presented at Fourth International Symposium on Field Screening Methods for Hazardous Waste and Toxic Chemicals, February 22-24, 1995, Las Vegas, NV.

SPECIALIZED TRAINING

- Data Evaluation for Vapor Intrusion Studies, 9/07

- Sediment Toxicity Testing: Methods to Achieve Strong Data Sets and Interpret Results, 6/07
- Assessing the Vapor Intrusion Pathway at Contaminated Sites, NHDES Waste Management Division, 4/05
- Perchlorate Webinar, USEPA, 2/05
- Improved Project Communication: Within and Outside of the Project Team, ASCE Continuing Education Program, 12/15/04
- Communicating with Tact and Skill for Managers and Supervisors, Rockhurst University Continuing Education Center, 2004
- Training Session for USACE-NAE/USEPA Region I Regional Implementation Manual, 10/7/04
- Training for Non-Trainers, USEPA, 9/04
- Overview of Statistical Data Quality Assessment, USEPA, 9/04
- Assessing Quality Systems, USEPA, 9/04
- Understanding and Evaluating Data Quality Assessments, USEPA, 9/28/04
- PowerPoint 2000 – Level 1, New Horizons Computer Learning Centers, 12/03
- USEPA Forms II Lite Training Course, 9/23/03



Nancy Weaver

Education

B.S., Chemistry, University of Colorado, Denver, Colorado

Certifications and Training

State of New York Department of Environmental Conservation
certified Asbestos Inspector

40-Hour OSHA Hazardous Waste Training

8-Hour Health and Safety Supervisor Training for Hazardous Waste
Operations

Relevant Experience

- More than 20 years combined laboratory, data validation and project management experience
- Experienced in writing Quality Assurance Project Plans (QAPPs), managing subcontracted analytical laboratories, performing laboratory audits, and analyzing samples in a laboratory.

Experience Overview

Ms. Weaver has over twenty years combined laboratory, data validation and project management experience. She is the President and co-founder of EDS and is responsible for the technical data review and validation of laboratory data. Ms. Weaver has performed data validation on thousands of data validation projects. She has extensive knowledge in applying the various regional and project specific data validation guidelines and QAPPs. Her experience also includes writing Quality Assurance Project Plans (QAPPs), managing subcontracted analytical laboratories, performing laboratory audits, participating in field sampling activities and analyzing samples in a laboratory.

Relevant Project Experience

Principal/Senior Chemist, Environmental Data Services, Inc., Williamsburg, Virginia, August 1994 - Present. As the Principal Chemist at Environmental Data Services, Inc., Ms. Weaver has provided Level IV data review on more than 6000 Sample Delivery Groups (SDGs) generated through site investigations and/or remediations. These SDGs have included every analytical fraction possible including VOC, SVOC, pesticides, PCBs, herbicides, DRO, GRO, dioxin/furans, PCB congeners, metals, wet chemistry and radiological parameters. Sample matrices include water, soil, sediment, wipe, concrete and air. The SDGs have included CLP data packages produced under the CLP SOWs and CLP-like data packages with samples analyzed under SW-864 methodologies. Sample quantities validated may reach upwards of 120,000 per fraction over the past 20 years. Ms. Weaver has been using the USEPA National Functional Data Validation Guidelines since 1993 and has provided Level IV (full) and Level III (cursory) validation. Specifically validated PCB congeners by EPA Method 1668 and dioxin/furans by EPA Method 1613 using the USEPA National Functional Guidelines, USEPA Region I and USEPA Region III data validation guidelines. Validated radiological parameters analyzed by alpha and gamma spectrometry using the USACE Kansas City and St. Louis District Radionuclide Data Quality Evaluation Guidance.

Chemist-Analyst Specialist, City & County of Denver, Denver, Colorado, June 1992 - August 1994. As a Chemist-Analyst Specialist for the City and County of Denver, Ms. Weaver supervised performance and compliance sampling for O & M requirements at groundwater treatment facility. She provided assessment of analytical data for quarterly reports to local regulatory agencies. She also acted as liaison between the technical group and laboratory to coordinate sampling events and resolve problems with analyses. While in this capacity, she performed data validation for organic, inorganic and radiological analyses. Ms. Weaver reviewed over 2000 VOC, SVOC, pesticide, PCB, TPH, metals and wet chemistry samples. Ms. Weaver managed the database for groundwater and treatment plant sampling events and performed environmental site assessments for commercial and residential properties. She provided technical review and recommendations of Phase I and Phase II site investigations performed by outside consultants. She also analyzed policy and interpreted city, state and federal environmental regulations.

Data Validation Specialist, C.C. Johnson & Malhotra, Lakewood, Colorado, January 1990 to June 1992. While a Data Validation Specialist at C.C. Johnson & Malhorta, Ms. Weaver performed data validation and interpretation of organic analytical data generated from the EPA Contract Laboratory Program (CLP). Data analysis included VOC,



SVOC, pesticides, PCBs, metals and wet chemistry. Ms. Weaver reviewed more than 600 SDGs and 9000 samples. She interpreted gas chromatograms, gas chromatography/mass spectral data and verified mathematical calculations.

Environmental Chemist, The Anschutz Corporation - SP Environmental Systems, Inc., Denver, Colorado, July 1990 to January 1992. As an Environmental Chemist for The Anschutz Corporation - SP Environmental Systems, Inc., Ms. Weaver assisted in the management of site investigations and remediation for Southern Pacific Transportation Company properties. In this capacity, she performed environmental audits and site assessments and conducted site investigations at potential Superfund sites with state and federal agencies. She researched and prepared responses to regulatory agencies for non-compliant sites and defined the needs for hazardous waste disposal including the analysis required and disposal. Ms. Weaver also supervised the removal of underground storage tanks and remediation. She prepared closure reports for UST removals, as well as annual waste summary forms for TSD facilities throughout the state of Texas. She also constructed, developed, and sampled groundwater monitoring wells.

Environmental Specialist, Martin Marietta Astronautics Group, Denver, Colorado, January 1988 to January 1990. While with Martin Marietta Astronautics Group as an Environmental Specialist, Ms. Weaver performed organic analysis and sampling of wastewater, groundwater, and drinking water in support of NPDES permit. She operated and maintained laboratory instrumentation including GC and GC/MS for volatile, semi-volatile, and pesticide/PCB analysis. Ms. Weaver also coordinated sample collection and preparation activities, developed and authored standard operating procedures for laboratory analysis, and followed EPA protocol for QA/QC requirements for analysis. She calculated and interpreted data and reported results.

Environmental Chemist, Camp, Dresser, & McKee, Boston, Massachusetts, April 1986 to October 1987. As an Environmental Chemist with Camp, Dresser, & McKee, Ms. Weaver analyzed water/wastewater for organic compounds. She operated and maintained laboratory instrumentation including GC and infrared spectrophotometer for volatile, pesticide/PCB, and petroleum hydrocarbon analysis. She also calculated and interpreted data and reported results. Ms. Weaver analyzed more than 2000 samples.

Employment History

Environmental Data Services, Inc.	Principal/Senior Chemist	1994–Present
City & County of Denver	Chemist-Analyst Specialist	1992–1994
C.C. Johnson & Malhorta	Contractor/Data Validation Specialist	1990–1992
The Anschutz Corporation - SP Environmental Systems, Inc.	Environmental Chemist	1990–1992
Martin Marietta Astronautics Group	Environmental Specialist	1988–1990
Camp, Dresser, & McKee	Environmental Chemist	1986–1987

ATTACHMENT D

NYSDEC – PFAS Sampling, Analysis, and Assessment Guidance



Department of
Environmental
Conservation

SAMPLING, ANALYSIS, AND ASSESSMENT OF PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS)

Under NYSDEC's Part 375 Remedial Programs

November 2022



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ERRATA SHEET for

**SAMPLING, ANALYSIS, AND ASSESSMENT OF PER- AND POLYFLUOROALKYL SUBSTANCES
(PFAS) Under NYSDEC's Part 375 Remedial Programs Issued January 17, 2020**

Citation and Page Number	Current Text	Corrected Text	Date
Title of Appendix I, page 32	Appendix H	Appendix I	2/25/2020
Document Cover, page 1	Guidelines for Sampling and Analysis of PFAS	Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC's Part 375 Remedial Programs	9/15/2020
Routine Analysis, page 9	"However, laboratories analyzing environmental samples...PFOA and PFOS in drinking water by EPA Method 537, 537.1 or ISO 25101."	"However, laboratories analyzing environmental samples...PFOA and PFOS in drinking water by EPA Method 537, 537.1, ISO 25101, or Method 533."	9/15/2020
Additional Analysis, page 9, new paragraph regarding soil parameters	None	"In cases where site-specific cleanup objectives for PFOA and PFOS are to be assessed, soil parameters, such as Total Organic Carbon (EPA Method 9060), soil pH (EPA Method 9045), clay content (percent), and cation exchange capacity (EPA Method 9081), should be included in the analysis to help evaluate factors affecting the leachability of PFAS in site soils."	9/15/2020
Data Assessment and Application to Site Cleanup Page 10	Until such time as Ambient Water Quality Standards (AWQS) and Soil Cleanup Objectives (SCOs) for PFAS are published, the extent of contaminated media potentially subject to remediation should be determined on a case-by-case basis using the procedures discussed below and the criteria in DER-10. Target levels for cleanup of PFAS in other media, including biota and sediment, have not yet been established by the DEC.	Until such time as Ambient Water Quality Standards (AWQS) and Soil Cleanup Objectives (SCOs) for PFOA and PFOS are published, the extent of contaminated media potentially subject to remediation should be determined on a case-by-case basis using the procedures discussed below and the criteria in DER-10. Preliminary target levels for cleanup of PFOA and PFOS in other media, including biota and sediment, have not yet been established by the DEC.	9/15/2020

Citation and Page Number	Current Text	Corrected Text	Date
Water Sample Results Page 10	<p>PFAS should be further assessed and considered as a potential contaminant of concern in groundwater or surface water (...)</p> <p>If PFAS are identified as a contaminant of concern for a site, they should be assessed as part of the remedy selection process in accordance with Part 375 and DER-10.</p>	<p>PFOA and PFOS should be further assessed and considered as potential contaminants of concern in groundwater or surface water (...)</p> <p>If PFOA and/or PFOS are identified as contaminants of concern for a site, they should be assessed as part of the remedy selection process in accordance with Part 375 and DER-10.</p>	9/15/2020
Soil Sample Results, page 10	<p>“The extent of soil contamination for purposes of delineation and remedy selection should be determined by having certain soil samples tested by Synthetic Precipitation Leaching Procedure (SPLP) and the leachate analyzed for PFAS. Soil exhibiting SPLP results above 70 ppt for either PFOA or PFOS (individually or combined) are to be evaluated during the cleanup phase.”</p>	<p>“Soil cleanup objectives for PFOA and PFOS will be proposed in an upcoming revision to 6 NYCRR Part 375-6. Until SCOs are in effect, the following are to be used as guidance values. “</p> <p>[Interim SCO Table]</p> <p>“PFOA and PFOS results for soil are to be compared against the guidance values listed above. These guidance values are to be used in determining whether PFOA and PFOS are contaminants of concern for the site and for determining remedial action objectives and cleanup requirements. Site-specific remedial objectives for protection of groundwater can also be presented for evaluation by DEC. Development of site-specific remedial objectives for protection of groundwater will require analysis of additional soil parameters relating to leachability. These additional analyses can include any or all the parameters listed above (soil pH, cation exchange capacity, etc.) and/or use of SPLP.</p> <p>As the understanding of PFAS transport improves, DEC welcomes proposals for site-specific remedial objectives for protection of groundwater. DEC will expect that those may be dependent on additional factors including soil pH, aqueous pH, % organic carbon, % Sand/Silt/Clay, soil cations: K, Ca, Mg, Na, Fe, Al, cation exchange capacity, and anion exchange capacity. Site-specific remedial objectives should also consider the dilution attenuation factor (DAF). The NJDEP publication on DAF can be used as a reference:</p> <p>https://www.nj.gov/dep/srp/guidance/rs/daf.pdf. ”</p>	9/15/2020

Citation and Page Number	Current Text	Corrected Text	Date
Testing for Imported Soil Page 11	<p>Soil imported to a site for use in a soil cap, soil cover, or as backfill is to be tested for PFAS in general</p> <p>conformance with DER-10, Section 5.4(e) for the PFAS Analyte List (Appendix F) using the analytical procedures discussed below and the criteria in DER-10 associated with SVOCs.</p> <p>If PFOA or PFOS is detected in any sample at or above 1 µg/kg, then soil should be tested by SPLP and the leachate analyzed for PFAS. If the SPLP results exceed 10 ppt for either PFOA or PFOS (individually) then the source of backfill should be rejected, unless a site-specific exemption is provided by DER. SPLP leachate criteria is based on the Maximum Contaminant Levels proposed for drinking water by New York State's Department of Health, this value may be updated based on future Federal or State promulgated regulatory standards. Remedial parties have the option of analyzing samples concurrently for both PFAS in soil and in the SPLP leachate to minimize project delays. Category B deliverables should be submitted for backfill samples, though a DUSR is not required.</p>	<p>Testing for PFAS should be included any time a full TAL/TCL analyte list is required. Results for PFOA and PFOS should be compared to the applicable guidance values. If PFOA or PFOS is detected in any sample at or above the guidance values then the source of backfill should be rejected, unless a site-specific exemption is provided by DER based on SPLP testing, for example. If the concentrations of PFOA and PFOS in leachate are at or above 10 ppt (the Maximum Contaminant Levels established for drinking water by the New York State Department of Health), then the soil is not acceptable.</p> <p>PFOA, PFOS and 1,4-dioxane are all considered semi-volatile compounds, so composite samples are appropriate for these compounds when sampling in accordance with DER-10, Table 5.4(e)10. Category B deliverables should be submitted for backfill samples, though a DUSR is not required.</p>	9/15/2020

Citation and Page Number	Current Text	Corrected Text	Date
Footnotes	None	¹ TOP Assay analysis of highly contaminated samples, such as those from an AFFF (aqueous film-forming foam) site, can result in incomplete oxidation of the samples and an underestimation of the total perfluoroalkyl substances. ² The movement of PFAS in the environment is being aggressively researched at this time; that research will eventually result in more accurate models for the behaviors of these chemicals. In the meantime, DEC has calculated the soil cleanup objective for the protection of groundwater using the same procedure used for all other chemicals, as described in Section 7.7 of the Technical Support Document (http://www.dec.ny.gov/docs/remediation_hudson_pdf/techsuppdoc.pdf).	9/15/2020
Additional Analysis, page 9	In cases... soil parameters, such as Total Organic Carbon (EPA Method 9060), soil...	In cases... soil parameters, such as Total Organic Carbon (Lloyd Kahn), soil...	1/8/2021
Appendix A, General Guidelines, fourth bullet	List the ELAP-approved lab(s) to be used for analysis of samples	List the ELAP- certified lab(s) to be used for analysis of samples	1/8/2021
Appendix E, Laboratory Analysis and Containers	Drinking water samples collected using this protocol are intended to be analyzed for PFAS by ISO Method 25101.	Drinking water samples collected using this protocol are intended to be analyzed for PFAS by EPA Method 537, 537.1, 533, or ISO Method 25101	1/8/2021
Water Sample Results Page 9	<p>“In addition, further assessment of water may be warranted if either of the following screening levels are met:</p> <p>a. any other individual PFAS (not PFOA or PFOS) is detected in water at or above 100 ng/L; or</p> <p>b. total concentration of PFAS (including PFOA and PFOS) is detected in water at or above 500 ng/L”</p>	Deleted	6/15/2021

Citation and Page Number	Current Text	Corrected Text	Date
Routine Analysis, Page XX	Currently, New York State Department of Health's Environmental Laboratory Approval Program (ELAP)... criteria set forth in the DER's laboratory guidelines for PFAS in non-potable water and solids (Appendix H - Laboratory Guidelines for Analysis of PFAS in Non-Potable Water and Solids).	Deleted	5/31/2022
Analysis and Reporting, Page XX	As of October 2020, the United States Environmental Protection Agency (EPA) does not have a validated method for analysis of PFAS for media commonly analyzed under DER remedial programs (non-potable waters, solids). DER has developed the following guidelines to ensure consistency in analysis and reporting of PFAS.	Deleted	5/31/2022
Routine Analysis, Page XX	LC-MS/MS analysis for PFAS using methodologies based on EPA Method 537.1 is the procedure to use for environmental samples. Isotope dilution techniques should be utilized for the analysis of PFAS in all media.	EPA Method 1633 is the procedure to use for environmental samples.	
Soil Sample Results, Page XX	Soil cleanup objectives for PFOA and PFOS will be proposed in an upcoming revision to 6 NYCRR Part 375-6	Soil cleanup objectives for PFOA and PFOS have been proposed in an upcoming revision to 6 NYCRR Part 375-6	
Appendix A	"Include in the text... LC-MS/MS for PFAS using methodologies based on EPA Method 537.1"	"Include in the textEPA Method 1633"	
Appendix A	"Laboratory should have ELAP certification for PFOA and PFOS in drinking water by EPA Method 537, 537.1, EPA Method 533, or ISO 25101"	Deleted	
Appendix B	"Samples collected using this protocol are intended to be analyzed for PFAS using methodologies based on EPA Method 537.1"	"Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633"	

Citation and Page Number	Current Text	Corrected Text	Date
Appendix C	“Samples collected using this protocol are intended to be analyzed for PFAS using methodologies based on EPA Method 537.1”	“Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633”	
Appendix D	“Samples collected using this protocol are intended to be analyzed for PFAS using methodologies based on EPA Method 537.1”	“Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633”	
Appendix G		Updated to include all forty PFAS analytes in EPA Method 533	
Appendix H		Deleted	
Appendix I	Appendix I	Appendix H	
Appendix H	“These guidelines are intended to be used for the validation of PFAS analytical results for projects within the Division of Environmental Remediation (DER) as well as aid in the preparation of a data usability summary report.”	“These guidelines are intended to be used for the validation of PFAS using EPA Method 1633 for projects within the Division of Environmental Remediation (DER).”	
Appendix H	“The holding time is 14 days...”	“The holding time is 28 days...”	
Appendix H, Initial Calibration	“The initial calibration should contain a minimum of five standards for linear fit...”	“The initial calibration should contain a minimum of six standards for linear fit...”	
Appendix H, Initial Calibration	Linear fit calibration curves should have an R ² value greater than 0.990.	Deleted	
Appendix H, Initial Calibration Verification	Initial Calibration Verification Section	Deleted	
Appendix H	secondary Ion Monitoring Section	Deleted	
Appendix H	Branched and Linear Isomers Section	Deleted	

Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC's Part 375 Remedial Programs

Objective

New York State Department of Environmental Conservation's Division of Environmental Remediation (DER) performs or oversees sampling of environmental media and subsequent analysis of PFAS as part of remedial programs implemented under 6 NYCRR Part 375. To ensure consistency in sampling, analysis, reporting, and assessment of PFAS, DER has developed this document which summarizes currently accepted procedures and updates previous DER technical guidance pertaining to PFAS.

Applicability

All work plans submitted to DEC pursuant to one of the remedial programs under Part 375 shall include PFAS sampling and analysis procedures that conform to the guidelines provided herein.

As part of a site investigation or remedial action compliance program, whenever samples of potentially affected media are collected and analyzed for the standard Target Analyte List/Target Compound List (TAL/TCL), PFAS analysis should also be performed. Potentially affected media can include soil, groundwater, surface water, and sediment. Based upon the potential for biota to be affected, biota sampling and analysis for PFAS may also be warranted as determined pursuant to a Fish and Wildlife Impact Analysis. Soil vapor sampling for PFAS is not required.

Field Sampling Procedures

DER-10 specifies technical guidance applicable to DER's remedial programs. Given the prevalence and use of PFAS, DER has developed "best management practices" specific to sampling for PFAS. As specified in DER-10 Chapter 2, quality assurance procedures are to be submitted with investigation work plans. Typically, these procedures are incorporated into a work plan, or submitted as a stand-alone document (e.g., a Quality Assurance Project Plan). Quality assurance guidelines for PFAS are listed in Appendix A - Quality Assurance Project Plan (QAPP) Guidelines for PFAS.

Field sampling for PFAS performed under DER remedial programs should follow the appropriate procedures outlined for soils, sediments, or other solids (Appendix B), non-potable groundwater (Appendix C), surface water (Appendix D), public or private water supply wells (Appendix E), and fish tissue (Appendix F).

QA/QC samples (e.g. duplicates, MS/MSD) should be collected as specified in DER-10, Section 2.3(c). For sampling equipment coming in contact with aqueous samples only, rinsate or equipment blanks should be collected. Equipment blanks should be collected at a minimum frequency of one per day per site or one per twenty samples, whichever is more frequent.

Analysis and Reporting

The investigation work plan should describe analysis and reporting procedures, including laboratory analytical procedures for the methods discussed below. As specified in DER-10 Section 2.2, laboratories should provide a full Category B deliverable. In addition, a Data Usability Summary Report (DUSR) should be prepared by an independent, third party data validator. Electronic data submissions should meet the requirements provided at: <https://www.dec.ny.gov/chemical/62440.html>.

DER has developed a *PFAS Analyte List* (Appendix G) for remedial programs to understand the nature of contamination at sites. It is expected that reported results for PFAS will include, at a minimum, all the compounds listed. If lab and/or matrix specific issues are encountered for any analytes, the DER project manager, in consultation with the DER chemist, will make case-by-case decisions as to whether certain analytes may be temporarily or permanently discontinued from analysis at each site. As with other contaminants that are analyzed for at a site, the *PFAS Analyte List* may be refined for future sampling events based on investigative findings.

Routine Analysis

EPA Method 1633 is the procedure to use for environmental samples. Reporting limits for PFOA and PFOS in aqueous samples should not exceed 2 ng/L. Reporting limits for PFOA and PFOS in solid samples should not exceed 0.5 µg/kg. Reporting limits for all other PFAS in aqueous and solid media should be as close to these limits as possible. If laboratories indicate that they are not able to achieve these reporting limits for the entire *PFAS Analyte List*, site-specific decisions regarding acceptance of elevated reporting limits for specific PFAS can be made by the DER project manager in consultation with the DER chemist. Data review guidelines were developed by DER to ensure data comparability and usability (Appendix H - Data Review Guidelines for Analysis of PFAS in Non-Potable Water and Solids).

Additional Analysis

Additional laboratory methods for analysis of PFAS may be warranted at a site, such as the Synthetic Precipitation Leaching Procedure (SPLP) and Total Oxidizable Precursor Assay (TOP Assay).

In cases where site-specific cleanup objectives for PFOA and PFOS are to be assessed, soil parameters, such as Total Organic Carbon (Lloyd Kahn), soil pH (EPA Method 9045), clay content (percent), and cation exchange capacity (EPA Method 9081), should be included in the analysis to help evaluate factors affecting the leachability of PFAS in site soils.

SPLP is a technique used to determine the mobility of chemicals in liquids, soils and wastes, and may be useful in determining the need for addressing PFAS-containing material as part of the remedy. SPLP by EPA Method 1312 should be used unless otherwise specified by the DER project manager in consultation with the DER chemist.

Impacted materials can be made up of PFAS that are not analyzable by routine analytical methodology. A TOP Assay can be utilized to conceptualize the amount and type of oxidizable PFAS which could be liberated in the environment, which approximates the maximum concentration of perfluoroalkyl substances that could be generated if all polyfluoroalkyl substances were oxidized. For example, some polyfluoroalkyl substances may degrade or transform to form perfluoroalkyl substances (such as PFOA or PFOS), resulting in an increase in perfluoroalkyl substance concentrations as contaminated groundwater moves away from a source. The TOP Assay converts, through oxidation, polyfluoroalkyl substances (precursors) into perfluoroalkyl substances that can be detected by routine analytical methodology.¹

¹ TOP Assay analysis of highly contaminated samples, such as those from an AFFF (aqueous film-forming foam) site, can result in incomplete oxidation of the samples and an underestimation of the total perfluoroalkyl substances.

Commercial laboratories have adopted methods which allow for the quantification of targeted PFAS in air and biota. The EPA's Office of Research and Development (ORD) is currently developing methods which allow for air emissions characterization of PFAS, including both targeted and non-targeted analysis of PFAS. Consult with the DER project manager and the DER chemist for assistance on analyzing biota/tissue and air samples.

Data Assessment and Application to Site Cleanup

Until such time as Ambient Water Quality Standards (AWQS) and Soil Cleanup Objectives (SCOs) for PFOA and PFOS are published, the extent of contaminated media potentially subject to remediation should be determined on a case-by-case basis using the procedures discussed below and the criteria in DER-10. Preliminary target levels for cleanup of PFOA and PFOS in other media, including biota and sediment, have not yet been established by the DEC.

Water Sample Results

PFOA and PFOS should be further assessed and considered as potential contaminants of concern in groundwater or surface water if PFOA or PFOS is detected in any water sample at or above 10 ng/L (ppt) and is determined to be attributable to the site, either by a comparison of upgradient and downgradient levels, or the presence of soil source areas, as defined below.

If PFOA and/or PFOS are identified as contaminants of concern for a site, they should be assessed as part of the remedy selection process in accordance with Part 375 and DER-10.

Soil Sample Results

Soil cleanup objectives for PFOA and PFOS have been proposed in an upcoming revision to 6 NYCRR Part 375-6. Until SCOs are in effect, the following are to be used as guidance values:

Guidance Values for Anticipated Site Use	PFOA (ppb)	PFOS (ppb)
Unrestricted	0.66	0.88
Residential	6.6	8.8
Restricted Residential	33	44
Commercial	500	440
Industrial	600	440
Protection of Groundwater ²	1.1	3.7

PFOA and PFOS results for soil are to be compared against the guidance values listed above. These guidance values are to be used in determining whether PFOA and PFOS are contaminants of concern for the site and for determining remedial action objectives and cleanup requirements. Site-specific remedial objectives for protection of groundwater can also be presented for evaluation by DEC. Development of site-specific remedial objectives for protection of groundwater will require analysis of additional soil parameters relating to leachability. These additional analyses can include any or all the parameters listed above (soil pH, cation exchange capacity, etc.) and/or use of SPLP.

As the understanding of PFAS transport improves, DEC welcomes proposals for site-specific remedial objectives for protection of groundwater. DEC will expect that those may be dependent on additional factors including soil pH, aqueous pH, % organic carbon, % Sand/Silt/Clay, soil cations: K, Ca, Mg, Na, Fe, Al, cation exchange

² The movement of PFAS in the environment is being aggressively researched at this time; that research will eventually result in more accurate models for the behaviors of these chemicals. In the meantime, DEC has calculated the guidance value for the protection of groundwater using the same procedure used for all other chemicals, as described in Section 7.7 of the Technical Support Document (http://www.dec.ny.gov/docs/remediation_hudson_pdf/techsuppdoc.pdf).

capacity, and anion exchange capacity. Site-specific remedial objectives should also consider the dilution attenuation factor (DAF). The NJDEP publication on DAF can be used as a reference:

<https://www.nj.gov/dep/srp/guidance/rs/daf.pdf>.

Testing for Imported Soil

Testing for PFAS should be included any time a full TAL/TCL analyte list is required. Results for PFOA and PFOS should be compared to the applicable guidance values. If PFOA or PFOS is detected in any sample at or above the guidance values then the source of backfill should be rejected, unless a site-specific exemption is provided by DER based on SPLP testing, for example. If the concentrations of PFOA and PFOS in leachate are at or above 10 ppt (the Maximum Contaminant Levels established for drinking water by the New York State Department of Health), then the soil is not acceptable.

PFOA, PFOS and 1,4-dioxane are all considered semi-volatile compounds, so composite samples are appropriate for these compounds when sampling in accordance with DER-10, Table 5.4(e)10. Category B deliverables should be submitted for backfill samples, though a DUSR is not required.

Appendix A - Quality Assurance Project Plan (QAPP) Guidelines for PFAS

The following guidelines (general and PFAS-specific) can be used to assist with the development of a QAPP for projects within DER involving sampling and analysis of PFAS.

General Guidelines in Accordance with DER-10

- Document/work plan section title – Quality Assurance Project Plan
- Summarize project scope, goals, and objectives
- Provide project organization including names and resumes of the project manager, Quality Assurance Officer (QAO), field staff, and Data Validator
 - The QAO should not have another position on the project, such as project or task manager, that involves project productivity or profitability as a job performance criterion
- List the ELAP certified lab(s) to be used for analysis of samples
- Include a site map showing sample locations
- Provide detailed sampling procedures for each matrix
- Include Data Quality Usability Objectives
- List equipment decontamination procedures
- Include an “Analytical Methods/Quality Assurance Summary Table” specifying:
 - Matrix type
 - Number or frequency of samples to be collected per matrix
 - Number of field and trip blanks per matrix
 - Analytical parameters to be measured per matrix
 - Analytical methods to be used per matrix with minimum reporting limits
 - Number and type of matrix spike and matrix spike duplicate samples to be collected
 - Number and type of duplicate samples to be collected
 - Sample preservation to be used per analytical method and sample matrix
 - Sample container volume and type to be used per analytical method and sample matrix
 - Sample holding time to be used per analytical method and sample matrix
- Specify Category B laboratory data deliverables and preparation of a DUSR

Specific Guidelines for PFAS

- Include in the text that sampling for PFAS will take place
- Include in the text that PFAS will be analyzed by EPA Method 1633
- Include the list of PFAS compounds to be analyzed (*PFAS Analyte List*)
- Include the laboratory SOP for PFAS analysis
- List the minimum method-achievable Reporting Limits for PFAS
 - Reporting Limits should be less than or equal to:
 - Aqueous – 2 ng/L (ppt)
 - Solids – 0.5 µg/kg (ppb)
- Include the laboratory Method Detection Limits for the PFAS compounds to be analyzed
-
- Include detailed sampling procedures
 - Precautions to be taken
 - Pump and equipment types
 - Decontamination procedures
 - Approved materials only to be used
- Specify that regular ice only will be used for sample shipment
- Specify that equipment blanks should be collected at a minimum frequency of 1 per day per site for each matrix

Appendix B - Sampling Protocols for PFAS in Soils, Sediments and Solids

General

The objective of this protocol is to give general guidelines for the collection of soil, sediment and other solid samples for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Containers

Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633.

The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation's Division of Environmental Remediation.

No sampling equipment components or sample containers should come in to contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials including sample bottle cap liners with a PTFE layer.

A list of acceptable equipment is provided below, but other equipment may be considered appropriate based on sampling conditions.

- stainless steel spoon
- stainless steel bowl
- steel hand auger or shovel without any coatings

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Sampling is often conducted in areas where a vegetative turf has been established. In these cases, a pre-cleaned trowel or shovel should be used to carefully remove the turf so that it may be replaced at the conclusion of sampling. Surface soil samples (e.g. 0 to 6 inches below surface) should then be collected using a pre-cleaned, stainless steel spoon. Shallow subsurface soil samples (e.g. 6 to ~36 inches below surface) may be collected by digging a hole using a pre-cleaned hand auger or shovel. When the desired subsurface depth is reached, a pre-cleaned hand auger or spoon shall be used to obtain the sample.

When the sample is obtained, it should be deposited into a stainless steel bowl for mixing prior to filling the sample containers. The soil should be placed directly into the bowl and mixed thoroughly by rolling the material into the middle until the material is homogenized. At this point the material within the bowl can be placed into the laboratory provided container.

Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).

Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at $4 \pm 2^\circ$ Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- Request appropriate data deliverable (Category B) and an electronic data deliverable

Documentation

A soil log or sample log shall document the location of the sample/borehole, depth of the sample, sampling equipment, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate. Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appropriate rain gear (PVC, polyurethane, or rubber rain gear are acceptable), bug spray, and sunscreen should be used that does not contain PFAS. Well washed cotton coveralls may be used as an alternative to bug spray and/or sunscreen.

PPE that contains PFAS is acceptable when site conditions warrant additional protection for the samplers and no other materials can be used to be protective. Documentation of such use should be provided in the field notes.

Appendix C - Sampling Protocols for PFAS in Monitoring Wells

General

The objective of this protocol is to give general guidelines for the collection of groundwater samples for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Container

Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633.

The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include: stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation's Division of Environmental Remediation.

No sampling equipment components or sample containers should come in contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials including plumbers tape and sample bottle cap liners with a PTFE layer.

A list of acceptable equipment is provided below, but other equipment may be considered appropriate based on sampling conditions.

- stainless steel inertia pump with HDPE tubing
- peristaltic pump equipped with HDPE tubing and silicone tubing
- stainless steel bailer with stainless steel ball
- bladder pump (identified as PFAS-free) with HDPE tubing

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Monitoring wells should be purged in accordance with the sampling procedure (standard/volume purge or low flow purge) identified in the site work plan, which will determine the appropriate time to collect the sample. If sampling using standard purge techniques, additional purging may be needed to reduce turbidity levels, so samples contain a limited amount of sediment within the sample containers. Sample containers that contain sediment may cause issues at the laboratory, which may result in elevated reporting limits and other issues during the sample preparation that can compromise data usability. Sampling personnel should don new nitrile gloves prior to sample collection due to the potential to contact PFAS containing items (not related to the sampling equipment) during the purging activities.

Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).

Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at $4 \pm 2^\circ$ Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- Collect one equipment blank per day per site and minimum 1 equipment blank per 20 samples. The equipment blank shall test the new and decontaminated sampling equipment utilized to obtain a sample for residual PFAS contamination. This sample is obtained by using laboratory provided PFAS-free water and passing the water over or through the sampling device and into laboratory provided sample containers
- Additional equipment blank samples may be collected to assess other equipment that is utilized at the monitoring well
- Request appropriate data deliverable (Category B) and an electronic data deliverable

Documentation

A purge log shall document the location of the sample, sampling equipment, groundwater parameters, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate. Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appropriate rain gear (PVC, polyurethane, or rubber rain gear are acceptable), bug spray, and sunscreen should be used that does not contain PFAS. Well washed cotton coveralls may be used as an alternative to bug spray and/or sunscreen.

PPE that contains PFAS is acceptable when site conditions warrant additional protection for the samplers and no other materials can be used to be protective. Documentation of such use should be provided in the field notes.

Appendix D - Sampling Protocols for PFAS in Surface Water

General

The objective of this protocol is to give general guidelines for the collection of surface water samples for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Container

Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633.

The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include: stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation's Division of Environmental Remediation.

No sampling equipment components or sample containers should come in contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials including sample bottle cap liners with a PTFE layer.

A list of acceptable equipment is provided below, but other equipment may be considered appropriate based on sampling conditions.

- stainless steel cup

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Where conditions permit, (e.g. creek or pond) sampling devices (e.g. stainless steel cup) should be rinsed with site medium to be sampled prior to collection of the sample. At this point the sample can be collected and poured into the sample container.

If site conditions permit, samples can be collected directly into the laboratory container.

Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).

Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at $4 \pm 2^\circ$ Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- Collect one equipment blank per day per site and minimum 1 equipment blank per 20 samples. The equipment blank shall test the new and decontaminated sampling equipment utilized to obtain a sample for residual PFAS contamination. This sample is obtained by using laboratory provided PFAS-free water and passing the water over or through the sampling device and into laboratory provided sample containers
- Request appropriate data deliverable (Category B) and an electronic data deliverable

Documentation

A sample log shall document the location of the sample, sampling equipment, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate. Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appropriate rain gear (PVC, polyurethane, or rubber rain gear are acceptable), bug spray, and sunscreen should be used that does not contain PFAS. Well washed cotton coveralls may be used as an alternative to bug spray and/or sunscreen.

PPE that contains PFAS is acceptable when site conditions warrant additional protection for the samplers and no other materials can be used to be protective. Documentation of such use should be provided in the field notes.

Appendix E - Sampling Protocols for PFAS in Private Water Supply Wells

General

The objective of this protocol is to give general guidelines for the collection of water samples from private water supply wells (with a functioning pump) for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Container

Drinking water samples collected using this protocol are intended to be analyzed for PFAS by EPA Method 537, 537.1, 533, or ISO Method 25101. The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation's Division of Environmental Remediation.

No sampling equipment components or sample containers should come in contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials (e.g. plumbers tape), including sample bottle cap liners with a PTFE layer.

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Locate and assess the pressure tank and determine if any filter units are present within the building. Establish the sample location as close to the well pump as possible, which is typically the spigot at the pressure tank. Ensure sampling equipment is kept clean during sampling as access to the pressure tank spigot, which is likely located close to the ground, may be obstructed and may hinder sample collection.

Prior to sampling, a faucet downstream of the pressure tank (e.g., washroom sink) should be run until the well pump comes on and a decrease in water temperature is noted which indicates that the water is coming from the well. If the homeowner is amenable, staff should run the water longer to purge the well (15+ minutes) to provide a sample representative of the water in the formation rather than standing water in the well and piping system including the pressure tank. At this point a new pair of nitrile gloves should be donned and the sample can be collected from the sample point at the pressure tank.

Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).

Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at $4 \pm 2^\circ$ Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- If equipment was used, collect one equipment blank per day per site and a minimum 1 equipment blank per 20 samples. The equipment blank shall test the new and decontaminated sampling equipment utilized to obtain a sample for residual PFAS contamination. This sample is obtained by using laboratory provided PFAS-free water and passing the water over or through the sampling device and into laboratory provided sample containers.
- A field reagent blank (FRB) should be collected at a rate of one per 20 samples. The lab will provide a FRB bottle containing PFAS free water and one empty FRB bottle. In the field, pour the water from the one bottle into the empty FRB bottle and label appropriately.
- Request appropriate data deliverable (Category B) and an electronic data deliverable
- For sampling events where multiple private wells (homes or sites) are to be sampled per day, it is acceptable to collect QC samples at a rate of one per 20 across multiple sites or days.

Documentation

A sample log shall document the location of the private well, sample point location, owner contact information, sampling equipment, purge duration, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate and available (e.g. well construction, pump type and location, yield, installation date). Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appendix F - Sampling Protocols for PFAS in Fish

This appendix contains a copy of the latest guidelines developed by the Division of Fish and Wildlife (DFW) entitled “General Fish Handling Procedures for Contaminant Analysis” (Ver. 8).

Procedure Name: General Fish Handling Procedures for Contaminant Analysis

Number: FW-005

Purpose: This procedure describes data collection, fish processing and delivery of fish collected for contaminant monitoring. It contains the chain of custody and collection record forms that should be used for the collections.

Organization: Environmental Monitoring Section
Bureau of Ecosystem Health
Division of Fish and Wildlife (DFW)
New York State Department of Environmental Conservation (NYSDEC)
625 Broadway
Albany, New York 12233-4756

Version: 8

Previous Version Date: 21 March 2018

Summary of Changes to this Version: Updated bureau name to Bureau of Ecosystem Health. Added direction to list the names of all field crew on the collection record. Minor formatting changes on chain of custody and collection records.

Originator or Revised by: Wayne Richter, Jesse Becker

Date: 26 April 2019

Quality Assurance Officer and Approval Date: Jesse Becker, 26 April 2019

**NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

GENERAL FISH HANDLING PROCEDURES FOR CONTAMINANT ANALYSES

- A. Original copies of all continuity of evidence (i.e., Chain of Custody) and collection record forms must accompany delivery of fish to the lab. A copy shall be directed to the Project Leader or as appropriate, Wayne Richter. All necessary forms will be supplied by the Bureau of Ecosystem Health. Because some samples may be used in legal cases, it is critical that each section is filled out completely. Each Chain of Custody form has three main sections:
1. The top box is to be filled out **and signed** by the person responsible for the fish collection (e.g., crew leader, field biologist, researcher). This person is responsible for delivery of the samples to DEC facilities or personnel (e.g., regional office or biologist).
 2. The second section is to be filled out **and signed** by the person responsible for the collections while being stored at DEC, before delivery to the analytical lab. This may be the same person as in (1), but it is still required that they complete the section. Also important is the **range of identification numbers** (i.e., tag numbers) included in the sample batch.
 3. Finally, the bottom box is to record any transfers between DEC personnel and facilities. Each subsequent transfer should be **identified, signed, and dated**, until laboratory personnel take possession of the fish.
- B. The following data are required on each **Fish Collection Record** form:
1. Project and Site Name.
 2. DEC Region.
 3. All personnel (and affiliation) involved in the collection.
 4. Method of collection (gill net, hook and line, etc.)
 5. Preservation Method.
- C. The following data are to be taken on each fish collected and recorded on the **Fish Collection Record** form:
1. Tag number - Each specimen is to be individually jaw tagged at time of collection with a unique number. Make sure the tag is turned out so that the number can be read without opening the bag. Use tags in sequential order. For small fish or composite samples place the tag inside the bag with the samples. The Bureau of Ecosystem Health can supply the tags.
 2. Species identification (please be explicit enough to enable assigning genus and species). Group fish by species when processing.
 3. Date collected.
 4. Sample location (waterway and nearest prominent identifiable landmark).
 5. Total length (nearest mm or smallest sub-unit on measuring instrument) and weight (nearest g or

smallest sub-unit of weight on weighing instrument). Take all measures as soon as possible with calibrated, protected instruments (e.g. from wind and upsets) and prior to freezing.

6. Sex - fish may be cut enough to allow sexing or other internal investigation, but do not eviscerate. Make any incision on the right side of the belly flap or exactly down the midline so that a left-side fillet can be removed.

D. General data collection recommendations:

1. It is helpful to use an ID or tag number that will be unique. It is best to use metal striped bass or other uniquely numbered metal tags. If uniquely numbered tags are unavailable, values based on the region, water body and year are likely to be unique: for example, R7CAY11001 for Region 7, Cayuga Lake, 2011, fish 1. If the fish are just numbered 1 through 20, we have to give them new numbers for our database, making it more difficult to trace your fish to their analytical results and creating an additional possibility for errors.
 2. Process and record fish of the same species sequentially. Recording mistakes are less likely when all fish from a species are processed together. Starting with the bigger fish species helps avoid missing an individual.
 3. If using Bureau of Ecosystem Health supplied tags or other numbered tags, use tags in sequence so that fish are recorded with sequential Tag Numbers. This makes data entry and login at the lab and use of the data in the future easier and reduces keypunch errors.
 4. Record length and weight as soon as possible after collection and before freezing. Other data are recorded in the field upon collection. An age determination of each fish is optional, but if done, it is recorded in the appropriate "Age" column.
 5. For composite samples of small fish, record the number of fish in the composite in the Remarks column. Record the length and weight of each individual in a composite. All fish in a composite sample should be of the same species and members of a composite should be visually matched for size.
 6. Please submit photocopies of topographic maps or good quality navigation charts indicating sampling locations. GPS coordinates can be entered in the Location column of the collection record form in addition to or instead for providing a map. These records are of immense help to us (and hopefully you) in providing documented location records which are not dependent on memory and/or the same collection crew. In addition, they may be helpful for contaminant source trackdown and remediation/control efforts of the Department.
 7. When recording data on fish measurements, it will help to ensure correct data recording for the data recorder to call back the numbers to the person making the measurements.
- E. Each fish is to be placed in its own individual plastic bag. For small fish to be analyzed as a composite, put all of the fish for one composite in the same bag but use a separate bag for each composite. It is important to individually bag the fish to avoid difficulties or cross contamination when processing the fish for chemical analysis. Be sure to include the fish's tag number inside the bag, preferably attached to the fish with the tag number turned out so it can be read. Tie or otherwise secure the bag closed. **The Bureau of Ecosystem Health will supply the bags.** If necessary, food grade bags may be procured from a suitable vendor (e.g., grocery store). It is preferable to redundantly label each bag with a manila tag tied between the knot and the body of the bag. This tag should be labeled with the project name, collection location, tag number, collection date, and fish species. If scales are collected, the scale envelope should be labeled with

the same information.

- F. Groups of fish, by species, are to be placed in one large plastic bag per sampling location. **The Bureau of Ecosystem Health will supply the larger bags.** Tie or otherwise secure the bag closed. Label the site bag with a manila tag tied between the knot and the body of the bag. The tag should contain: project, collection location, collection date, species and **tag number ranges**. Having this information on the manila tag enables lab staff to know what is in the bag without opening it.
- G. Do not eviscerate, fillet or otherwise dissect the fish unless specifically asked to. If evisceration or dissection is specified, the fish must be cut along the exact midline or on the right side so that the left side fillet can be removed intact at the laboratory. If filleting is specified, the procedure for taking a standard fillet (SOP PREPLAB 4) must be followed, including removing scales.
- H. Special procedures for PFAS: Unlike legacy contaminants such as PCBs, which are rarely found in day to day life, PFAS are widely used and frequently encountered. Practices that avoid sample contamination are therefore necessary. While no standard practices have been established for fish, procedures for water quality sampling can provide guidance. The following practices should be used for collections when fish are to be analyzed for PFAS:
 - No materials containing Teflon.
 - No Post-it notes.
 - No ice packs; only water ice or dry ice.
 - Any gloves worn must be powder free nitrile.
 - No Gore-Tex or similar materials (Gore-Tex is a PFC with PFOA used in its manufacture).
 - No stain repellent or waterproof treated clothing; these are likely to contain PFCs.
 - Avoid plastic materials, other than HDPE, including clipboards and waterproof notebooks.
 - Wash hands after handling any food containers or packages as these may contain PFCs.
 - Keep pre-wrapped food containers and wrappers isolated from fish handling.
 - Wear clothing washed at least six times since purchase.
 - Wear clothing washed without fabric softener.
 - Staff should avoid cosmetics, moisturizers, hand creams and similar products on the day of sampling as many of these products contain PFCs (Fujii et al. 2013). Sunscreen or insect repellent should not contain ingredients with “fluor” in their name. Apply any sunscreen or insect repellent well downwind from all materials. Hands must be washed after touching any of these products.
- I. All fish must be kept at a temperature <45° F (<8° C) immediately following data processing. As soon as possible, freeze at -20° C ± 5° C. Due to occasional freezer failures, daily freezer temperature logs are required. The freezer should be locked or otherwise secured to maintain chain of custody.
- J. In most cases, samples should be delivered to the Analytical Services Unit at the Hale Creek field station. Coordinate delivery with field station staff and send copies of the collection records, continuity of evidence forms and freezer temperature logs to the field station. For samples to be analyzed elsewhere, non-routine collections or other questions, contact Wayne Richter, Bureau of Ecosystem Health, NYSDEC, 625 Broadway, Albany, New York 12233-4756, 518-402-8974, or the project leader about sample transfer. Samples will then be directed to the analytical facility and personnel noted on specific project descriptions.
- K. A recommended equipment list is at the end of this document.

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF FISH AND WILDLIFE
FISH COLLECTION RECORD

page _____ of _____

Project and Site Name _____ DEC Region _____

Collections made by (include all crew) _____

Sampling Method: ☐Electrofishing ☐Gill netting ☐Trap netting ☐Trawling ☐Seining ☐Angling ☐Other _____

Preservation Method: ☐Freezing ☐Other _____ Notes (SWFDB survey number): _____

FOR LAB USE ONLY- LAB ENTRY NO.	COLLECTION OR TAG NO.	SPECIES	DATE TAKEN	LOCATION	AGE	SEX &/OR REPROD. CONDIT	LENGTH ()	WEIGHT ()	REMARKS

richter: revised 2011, 5/7/15, 10/4/16, 3/20/17; becker: 3/23/17, 4/26/19

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION CHAIN OF CUSTODY

I, _____, of _____ collected the
(Print Name) (Print Business Address)
 following on _____, 20____ from _____
(Date) (Water Body)
 in the vicinity of _____
(Landmark, Village, Road, etc.)
 Town of _____, in _____ County.
 Item(s) _____

 Said sample(s) were in my possession and handled according to standard procedures provided to me prior to collection. The sample(s) were placed in the custody of a representative of the New York State Department of Environmental Conservation on _____, 20____.

Signature Date

I, _____, received the above mentioned sample(s) on the date specified and assigned identification number(s) _____ to the sample(s). I have recorded pertinent data for the sample(s) on the attached collection records. The sample(s) remained in my custody until subsequently transferred, prepared or shipped at times and on dates as attested to below.

Signature Date

SECOND RECIPIENT (Print Name)	TIME & DATE	PURPOSE OF TRANSFER
SIGNATURE	UNIT	
THIRD RECIPIENT (Print Name)	TIME & DATE	PURPOSE OF TRANSFER
SIGNATURE	UNIT	
FOURTH RECIPIENT (Print Name)	TIME & DATE	PURPOSE OF TRANSFER
SIGNATURE	UNIT	
RECEIVED IN LABORATORY BY (Print Name)	TIME & DATE	REMARKS
SIGNATURE	UNIT	
LOGGED IN BY (Print Name)	TIME & DATE	ACCESSION NUMBERS
SIGNATURE	UNIT	

NOTICE OF WARRANTY

By signature to the chain of custody (reverse), the signatory warrants that the information provided is truthful and accurate to the best of his/her ability. The signatory affirms that he/she is willing to testify to those facts provided and the circumstances surrounding the same. Nothing in this warranty or chain of custody negates responsibility nor liability of the signatories for the truthfulness and accuracy of the statements provided.

HANDLING INSTRUCTIONS

On day of collection, collector(s) name(s), address(es), date, geographic location of capture (attach a copy of topographic map or navigation chart), species, number kept of each species, and description of capture vicinity (proper noun, if possible) along with name of Town and County must be indicated on reverse.

Retain organisms in manila tagged plastic bags to avoid mixing capture locations. Note appropriate information on each bag tag.

Keep samples as cool as possible. Put on ice if fish cannot be frozen within 12 hours. If fish are held more than 24 hours without freezing, they will not be retained or analyzed.

Initial recipient (either DEC or designated agent) of samples from collector(s) is responsible for obtaining and recording information on the collection record forms which will accompany the chain of custody. This person will seal the container using packing tape and writing his signature, the time and the date across the tape onto the container with indelible marker. Any time a seal is broken, for whatever purpose, the incident must be recorded on the Chain of Custody (reason, time, and date) in the purpose of transfer block. Container then is resealed using new tape and rewriting signature, with time and date.

EQUIPMENT LIST

Scale or balance of appropriate capacity for the fish to be collected.

Fish measuring board.

Plastic bags of an appropriate size for the fish to be collected and for site bags.

Individually numbered metal tags for fish.

Manila tags to label bags.

Small envelopes, approximately 2" x 3.5", if fish scales are to be collected.

Knife for removing scales.

Chain of custody and fish collection forms.

Clipboard.

Pens or markers.

Paper towels.

Dish soap and brush.

Bucket.

Cooler.

Ice.

Duct tape.

Appendix G – PFAS Analyte List

Group	Chemical Name	Abbreviation	CAS Number
Perfluoroalkyl sulfonic acids	Perfluorobutanesulfonic acid	PFBS	375-73-5
	Perfluoropentanesulfonic acid	PFPeS	2706-91-4
	Perfluorohexanesulfonic acid	PFHxS	355-46-4
	Perfluoroheptanesulfonic acid	PFHpS	375-92-8
	Perfluorooctanesulfonic acid	PFOS	1763-23-1
	Perfluorononanesulfonic acid	PFNS	68259-12-1
	Perfluorodecanesulfonic acid	PFDS	335-77-3
	Perfluorododecanesulfonic acid	PFDoS	79780-39-5
Perfluoroalkyl carboxylic acids	Perfluorobutanoic acid	PFBA	375-22-4
	Perfluoropentanoic acid	PFPeA	2706-90-3
	Perfluorohexanoic acid	PFHxA	307-24-4
	Perfluoroheptanoic acid	PFHpA	375-85-9
	Perfluorooctanoic acid	PFOA	335-67-1
	Perfluorononanoic acid	PFNA	375-95-1
	Perfluorodecanoic acid	PFDA	335-76-2
	Perfluoroundecanoic acid	PFUnA	2058-94-8
	Perfluorododecanoic acid	PFDaA	307-55-1
	Perfluorotridecanoic acid	PFTTrDA	72629-94-8
	Perfluorotetradecanoic acid	PFTeDA	376-06-7
Per- and Polyfluoroether carboxylic acids	Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6
	4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4
	Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1
	Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5
	Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6
Fluorotelomer sulfonic acids	4:2 Fluorotelomer sulfonic acid	4:2-FTS	757124-72-4
	6:2 Fluorotelomer sulfonic acid	6:2-FTS	27619-97-2
	8:2 Fluorotelomer sulfonic acid	8:2-FTS	39108-34-4
Fluorotelomer carboxylic acids	3:3 Fluorotelomer carboxylic acid	3:3 FTCA	356-02-5
	5:3 Fluorotelomer carboxylic acid	5:3 FTCA	914637-49-3
	7:3 Fluorotelomer carboxylic acid	7:3 FTCA	812-70-4
Perfluorooctane sulfonamides	Perfluorooctane sulfonamide	PFOSA	754-91-6
	N-methylperfluorooctane sulfonamide	NMeFOSA	31506-32-8
	N-ethylperfluorooctane sulfonamide	NEtFOSA	4151-50-2
Perfluorooctane sulfonamidoacetic acids	N-methylperfluorooctane sulfonamidoacetic acid	N-MeFOSAA	2355-31-9
	N-ethylperfluorooctane sulfonamidoacetic acid	N-EtFOSAA	2991-50-6
Perfluorooctane sulfonamide ethanols	N-methylperfluorooctane sulfonamidoethanol	MeFOSE	24448-09-7
	N-ethylperfluorooctane sulfonamidoethanol	EtFOSE	1691-99-2

Group	Chemical Name	Abbreviation	CAS Number
Ether sulfonic acids	9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (F-53B Major)	9Cl-PF3ONS	756426-58-1
	11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (F-53B Minor)	11Cl-PF3OUdS	763051-92-9
	Perfluoro(2-ethoxyethane) sulfonic acid	PFEESA	113507-82-7

Appendix H - Data Review Guidelines for Analysis of PFAS in Non-Potable Water and Solids

General

These guidelines are intended to be used for the validation of PFAS using EPA Method 1633 for projects within the Division of Environmental Remediation (DER). Data reviewers should understand the methodology and techniques utilized in the analysis. Consultation with the end user of the data may be necessary to assist in determining data usability based on the data quality objectives in the Quality Assurance Project Plan. A familiarity with the laboratory's Standard Operating Procedure may also be needed to fully evaluate the data. If you have any questions, please contact DER's Quality Assurance Officer, Dana Barbarossa, at dana.barbarossa@dec.ny.gov.

Preservation and Holding Time

Samples should be preserved with ice to a temperature of less than 6°C upon arrival at the lab. The holding time is 28 days to extraction for aqueous and solid samples. The time from extraction to analysis for aqueous samples is 28 days and 40 days for solids.

Temperature greatly exceeds 6°C upon arrival at the lab*	Use professional judgement to qualify detects and non-detects as estimated or rejected
Holding time exceeding 28 days to extraction	Use professional judgement to qualify detects and non-detects as estimated or rejected if holding time is grossly exceeded

*Samples that are delivered to the lab immediately after sampling may not meet the thermal preservation guidelines. Samples are considered acceptable if they arrive on ice or an attempt to chill the samples is observed.

Initial Calibration

The initial calibration should contain a minimum of six standards for linear fit and six standards for a quadratic fit. The relative standard deviation (RSD) for a quadratic fit calibration should be less than 20%.

The low-level calibration standard should be within 50% - 150% of the true value, and the mid-level calibration standard within 70% - 130% of the true value.

%RSD >20%	J flag detects and UJ non detects
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Continuing Calibration Verification

Continuing calibration verification (CCV) checks should be analyzed at a frequency of one per ten field samples. If CCV recovery is very low, where detection of the analyte could be in question, ensure a low level CCV was analyzed and use to determine data quality.

CCV recovery <70 or >130%	J flag results
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Blanks

There should be no detections in the method blanks above the reporting limits. Equipment blanks, field blanks, rinse blanks etc. should be evaluated in the same manner as method blanks. Use the most contaminated blank to evaluate the sample results.

Blank Result	Sample Result	Qualification
Any detection	<Reporting limit	Qualify as ND at reporting limit
Any detection	>Reporting Limit and >10x the blank result	No qualification
>Reporting limit	>Reporting limit and <10x blank result	J+ biased high

Field Duplicates

A blind field duplicate should be collected at rate of one per twenty samples. The relative percent difference (RPD) should be less than 30% for analyte concentrations greater than two times the reporting limit. Use the higher result for final reporting.

RPD >30%	Apply J qualifier to parent sample
----------	------------------------------------

Lab Control Spike

Lab control spikes should be analyzed with each extraction batch or one for every twenty samples. In the absence of lab derived criteria, use 70% - 130% recovery criteria to evaluate the data.

Recovery <70% or >130% (lab derived criteria can also be used)	Apply J qualifier to detects and UJ qualifier to non detects
---	---

Matrix Spike/Matrix Spike Duplicate

One matrix spike and matrix spike duplicate should be collected at a rate of one per twenty samples. Use professional judgement to reject results based on out of control MS/MSD recoveries.

Recovery <70% or >130% (lab derived criteria can also be used)	Apply J qualifier to detects and UJ qualifier to non detects of parent sample only
RPD >30%	Apply J qualifier to detects and UJ qualifier to non detects of parent sample only

Extracted Internal Standards (Isotope Dilution Analytes)

Problematic analytes (e.g. PFBA, PFPeA, fluorotelomer sulfonates) can have wider recoveries without qualification. Qualify corresponding native compounds with a J flag if outside of the range.

Recovery <50% or >150%	Apply J qualifier
Recovery <25% or >150% for poor responding analytes	Apply J qualifier
Isotope Dilution Analyte (IDA) Recovery <10%	Reject results

Signal to Noise Ratio

The signal to noise ratio for the quantifier ion should be at least 3:1. If the ratio is less than 3:1, the peak is discernable from the baseline noise and symmetrical, the result can be reported. If the peak appears to be baseline noise and/or the shape is irregular, qualify the result as tentatively identified.

Reporting Limits

If project-specific reporting limits were not met, please indicate that in the report along with the reason (e.g. over dilution, dilution for non-target analytes, high sediment in aqueous samples).

Peak Integrations

Target analyte peaks should be integrated properly and consistently when compared to standards. Ensure branched isomer peaks are included for PFAS where standards are available. Inconsistencies should be brought to the attention of the laboratory or identified in the data review summary report.