REMEDIAL INVESTIGATION WORK PLAN
FORMER A&A BRAKE SERVICE SITE
NYSDEC BCP SITE C224372
558 SACKETT STREET
BROOKLYN, NEW YORK

by Haley & Aldrich of New York
New York, New York

for
Sackett Heights LLC
1365 St. Nicholas Avenue, 2nd Floor
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File No. 0206384
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Certification

I, Mari C. Conlon, certify that I am currently a Qualified Environmental Professional as defined in 6 NYCRR Part 375 and that that this Remedial Investigation Work Plan was prepared in accordance with the applicable statues and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

Mari Cate Conlon

2 March 2023

Mari C. Conlon, P.G.

Date

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1. Introduction

On behalf of the Applicant, Sackett Heights LLC, Haley & Aldrich of New York (Haley & Aldrich) has prepared this Remedial Investigation Work Plan (RIWP) for the Former A&A Brake Service BCP Site C224372, located at 558 Sackett Street (see Figure 1) in Brooklyn, New York (Site). This RIWP has been developed based on the NYSDEC's "Technical Guidance for Site Investigation and Remediation" (DER-10 dated May 2010).

The Site is located in the Gowanus neighborhood of Brooklyn and is identified as Block 433 Lot 14 on the New York City tax map. The Site is approximately 6,400 square-feet and is bound to the north by Sackett Street followed by a now vacant site which formerly operated as a manufactured gas plant (MGP), to the west by a two-story residential building, to the east by a three-story residential and commercial building, and to the south by residential buildings.

The Site is currently located within a residential and manufacturing zoning district (M1-4/R6A). The Site is located in an urban area surrounded by residential, commercial, and industrial properties served by municipal water.

The Site is listed with an environmental E-Designation (E-601) for hazardous materials, noise, and air quality (HVAC limited to natural gas and exhaust stack location limitations) resulting from a City Environmental Quality Review (CEQR) effective November 2021 CEQR # 19DCP157K). Satisfaction of the E-Designation requirements is subject to review and approval by the New York City Mayor's Office of Environmental Remediation (OER) prior to redevelopment. A site location map is provided as Figure 1 and a site plan showing the property boundaries and adjacent properties is provided as Figure 2.

We understand that Sackett Heights LLC plans to redevelop the Site with a 7-story residential building with 34 residential units of which 9 units will be affordable. The new development is anticipated to include a one level cellar requiring remedial excavations extending to up to approximately 12 feet below ground surface (ft bgs).

1.1 PURPOSE

A previous investigation conducted at the Site identified the presence of metals and SVOCs, specifically polycyclic aromatic hydrocarbons (PAHs), in soil and the presence of petroleum related VOCs in groundwater. In addition, the previous investigation detected petroleum related VOCs and chlorinated volatile organic compounds (CVOCs) in soil vapor at concentrations potentially indicating source material contamination which has not been identified to date. These findings will require additional investigation to ascertain and delineate any on-Site source(s).

The previous investigation did not comprehensively delineate the extent of soil, groundwater, and soil vapor contamination on the Site. Summaries of the historical soil, groundwater, and soil vapor data collected at the Site to date are displayed in Figures 3 through 5. In accordance with 6NYCRR Part 375-1.8 (e)(1) the remedial investigation will investigate and characterize the nature and extent of contamination at, or emanating from, the Site.

2. Background

2.1 CURRENT LAND USE

Currently, the Site is vacant and improved with a 2-story, slab-on-grade, brick warehouse/garage building and a 1-story brick warehouse. The Site is located within an urban area characterized by multi-story light industrial, commercial, and residential buildings. The Site is currently owned by Sackett Heights LLC, which is a New York State Domestic Limited Liability Corporation. Sackett Heights LLC plans to develop the Site with a 7-story residential building with a cellar, consistent with current zoning.

2.2 SITE HISTORY

Based on a Phase I Environmental Site Assessment (ESA) in May 2022, the Site was first developed as early as the late 1800s in which the Site was divided into three small tax parcels fronting along Sackett Street. Each of the parcels was developed with a low-rise residential or retail building occupying approximately half of their respective parcels, with several small outbuildings also present. By the late 1930s, the eastern parcel was redeveloped with a one-story building occupying the entire parcel footprint and identified as a private garage. By 1950, the center parcel was developed with a two-story building occupying the entire parcel footprint and identified as a private garage. The eastern building was identified as an auto repair shop. The residence on the western lot was demolished in the mid- to late-1960s, with the central and eastern buildings both identified as auto repair shops. Between the early and mid-1980s, the western and central parcels were redeveloped with a single two-story building identified as a warehouse. By 1988, this structure was identified as an auto repair shop.

Historical use of the surrounding properties up- and cross-gradient to the Site includes commercial, industrial, and manufacturing operations, most notably the Fulton Municipal Works Former MGP Site to the north across Sackett Street.

2.3 SURROUNDING LAND USE

The Site is located along Sackett Street between Nevins Street and 3rd Avenue in an urban area identified as the Gowanus neighborhood in the Borough of Brooklyn. No public schools or hospitals are located within a 500 ft radius of the Site. Thomas Greene Playground is located approximately 350 ft north of the Site.

Properties immediately surrounding the Site are within the recently approved Gowanus Neighborhood Plan (rezoning) and are now zoned for residential, commercial and use.

2.4 SURROUNDING LAND USE HISTORY

The area surrounding the Site has been used primarily for manufacturing, commercial, residential and auto-related uses from the late 1800s through the present day.

2.5 PREVIOUS REPORTS

To date the following reports have been completed for the Site:

1. May 2022 Phase I Environmental Site Assessment Prepared by Brussee Environmental Corp.
2. May 2022 Limited Phase II Environmental Site Assessment Prepared by Brussee Environmental Corp.

Previous reports are included in Appendix A. A summary of environmental findings is provided below.

May 2022 Phase I Environmental Site Assessment
Prepared by Brussee Environmental Corp.
A Phase I ESA was performed by Brussee Environmental Corp. (Brussee) dated May 2022 for the purpose of identifying Recognized Environmental Conditions (RECs) in connection with the Site.

The Phase I identified the following RECs at the Site:

- Historical use of the Site as a former garage and/or auto repair shop from at least the late-1930s through the early-2020s. The former use as a garage and/or auto repair shop is suspected to have impacted the subsurface quality beneath the Site and is considered a REC at this time which warrants a Phase II along with a geophysical survey in order to determine if any buried tanks exist on the Site.
- Historical use of the surrounding properties for various industrial and manufacturing uses, machine shops, iron works/foundries, services stations, garages/repair shops, and manufactured gas plan facilities. There is the potential for historic operations at the surrounding properties, most notably the Fulton Municipal Works Former MGP Site, which was located across Sackett Street, to have impacted the subsurface.

The following Historic Recognized Environmental Condition (HREC) was identified:

- The Site was listed on the Petroleum Bulk Storage (PBS) database as having one 275-gallon waste oil underground storage tank (UST), installed in 1988 and closed-in-place in 2009, and one 275-gallon waste oil aboveground storage tank (AST) installed in 2009. During the site inspection, there was no evidence of the abandoned UST or the AST, except for a vent pipe observed protruding through the roof of the eastern building.

The following environmental concerns [(ASTM Non-Scope issues/Business Environmental Risks (BERs)] were identified:

- The Site was identified as an E-Designation site by the New York City Office of Environmental Remediation (NYCOER) and assigned E-Designation E-601 – Gowanus Neighborhood Rezoning as a result of a City Environmental Quality Review effective November 2021 (CEQR #19DCP157K). The requirements under the E-Designation program are satisfaction of the requirements for hazardous materials, noise, and air quality with the NYCOER.

- Fluorescent ballasts were observed within portions of the building during the site inspection. Brussee recommended that a PCB survey be performed prior to demolition and/or remediation activities.
- The potential for fill materials to be present on-site due to former retail and residential buildings located in the western and central portions of the Site.
- No friable asbestos-containing materials were observed in the areas inspected on-site; however, due to the age of the buildings, it is possible that roofing, roof flashing and other buildings materials may contain asbestos. Brussee recommended that an asbestos survey be performed prior to any proposed work.

May 2022 Limited Phase II Environmental Site Assessment Prepared by Brussee Environmental Corp.

In May 2022, Brussee conducted a Limited Phase II ESA to evaluate potential impacts related to historic use of the Site. The investigation included the installation of six soil borings up to 20 ft bgs, three temporary groundwater monitoring points, three soil vapor points, and collection of soil, groundwater, and soil vapor samples. A total of 12 soil samples, three groundwater samples, and three soil vapor samples were collected. Field observations and laboratory analytical results are summarized below:

Soil

Brussee identified urban fill generally consisting of brown silty sand with gravel and brick fragments in each boring extending to depths ranging from 7 to 12 ft bgs. A smear zone of petroleum impacted soil was encountered at the groundwater table to approximately 6 feet below the groundwater table (10-16 ft bgs) within each of the soil borings. Staining and odors were observed around the groundwater interface in each of the borings and Photoionization Detector (PID) readings ranged from non-detect to 15,000 parts per million (ppm). Elevated concentrations of heavy metals including arsenic (maximum concentration of 19.6 mg/kg), barium (maximum concentration of 1,540 mg/kg), cadmium (maximum concentration of 14.5 mg/kg), chromium (maximum concentration of 212 mg/kg), lead (maximum concentration of 2,900 mg/kg), and mercury (maximum concentration of 4.42 mg/kg) were detected above RRSCOs within four of the six soil samples.

Petroleum related VOCs were detected above RRSCOs within two soil samples across the Site. SVOCs, specifically polycyclic aromatic hydrocarbons (PAHs), were detected above RRSCOs at one sample location.

Groundwater

Groundwater was encountered at a depth of approximately 10 ft bgs. Petroleum related VOCs were detected above New York State 6NYCRR Part 703.5 Class GA groundwater quality standards (GQS) within all three groundwater samples. The highest VOC concentrations were reported in sample GW1 located in the northern region of the Site along Sackett Street, and the lowest concentrations of VOCs were reported in sample GW3 located in the southern region of the Site.

Soil Vapor

Brussee installed three soil vapor implants at a depth of approximately 7 ft bgs. Soil vapor analytical results were compared to New York State Department of Health (NYSDOH) Final Guidance on Soil Vapor Intrusion (October 2006, updated May 2017) Matrix A, Matrix B, and Matrix C guidance values. Elevated concentrations of acetone (maximum concentration of 8,500 µg/m^3), methyl ethyl ketone (maximum concentration of 6,630 µg/m^3), and tetrahydrofuran (maximum concentration of 3,860 µg/m^3) were detected within each of the three soil vapor samples. The chlorinated VOCs tetrachloroethene (PCE), with a maximum concentration of 188 µg/m^3, and trichloroethene (TCE), with a maximum concentration of 720 µg/m^3, were detected within soil vapor samples.

Based on the findings of the Limited Phase II ESA, Brussee recommended additional investigation to further characterize soil, groundwater, and soil vapor quality.

3. Remedial Investigation

This section describes the field activities to be conducted during the RI and provides the sampling scope, objectives, methods, anticipated number of samples, and sample locations. A summary of the sampling and analysis plan is provided in Table 1 and Figure 2. The following activities will be conducted to fill data gaps and determine the nature and extent of contamination at the Site.

3.1 UTILITY MARKOUT

A geophysical survey was performed by Coastal Environmental Solutions (CES) within the interior of the 2-story warehouse on the western portion of the 558 Sackett Street Site on 25 April 2022. The GPR survey was not performed within the 1-story warehouse building on the eastern portion of the Site due to an elevated wooden floor constructed across the majority of the building. No anomalies indicative of an underground storage tank were identified within the areas accessible to the GPR surveying equipment. The May 2022 Phase II ESA report notes vent pipes observed on the roof including one vent pipe that was traced to an interior vault likely associated with a sediment trap or acid neutralization tank used prior to the final sewer connection and a second vent pipe traced down and interior wall and suspected to be associated with the former 275-gallon waste oil UST. The geophysical survey findings, were reported in the Phase II ESA report by Brussee, included in Appendix A, which did not provide a formal report or summary from CES.

3.2 SELECTIVE DEMOLITION

The existing structures prohibit the implementation of a comprehensive remedial investigation due to configuration of the interior structural walls and interior layout of the existing structures on the Site. Prior to commencing the remedial investigation, demolition of above grade structures will be completed as needed to facilitate the implementation of the remedial investigation. Existing foundation slabs will remain in place serving as an engineering control until a remedial action plan is approved and implemented.

3.3 SOIL SAMPLING

To further characterize subsurface soil conditions, additional on-site soil samples will be collected to meet NYSDEC DER-10 requirements for remedial investigations. The sampling and analysis plan is summarized in Table 1.

A total of 8 soil borings will be installed to 20 ft bgs by a track-mounted direct-push drill rig (Geoprobe®) operated by a licensed operator. Soil samples will be collected from acetate liners using a stainless-steel trowel or sampling spoon. Samples will be collected using laboratory provided clean bottle ware. VOC grab samples will be collected using terra cores or encores.

Soils will be logged continuously by a geologist or engineer using the Modified Burmister Soil Classification System. The presence of staining, odors, and photoionization detector (PID) response will be noted. Samples will be collected using laboratory-provided clean bottle ware. VOC grab samples will be collected using terra cores. Sampling methods are described in the Field Sampling Plan (FSP) provided as Appendix B. A Quality Assurance Project Plan (QAPP) is provided as Appendix C. Laboratory data will be reported in ASP Category B deliverable format.

Soil samples representative of Site conditions will be collected at 8 locations widely distributed across the Site, as shown in Figure 2. Samples will be collected from the surface at 0 to 0.5 ft bgs, 5 to 7 ft bgs, and 12 to 14 ft bgs. Additional samples will be collected from any interval exhibiting elevated PID readings or visual and olfactory impacts. Soil samples will be analyzed for:

- Target Compound List (TCL) VOCs using EPA method 8260B
- TCL SVOCs using EPA method 8270C
- Total Analyte List (TAL) Metals using EPA method 6010
- TCL Pesticides using EPA method 8081B
- PCBs using EPA method 8082
- Per- and polyfluoroalkyl substances (PFAS) by EPA Method 1633
- 1,4-dioxane by EPA Method 8270

Samples to be analyzed for PFAS and 1,4-dioxane will be collected and analyzed in accordance with the Sampling for “1,4-dioxane and Per- and Polyfluoroalkyl Substances (PFAS) Under DECs Part 375 Remedial Programs,” respectively.

3.4 GROUNDWATER SAMPLING

The purpose of the groundwater sampling is to obtain current groundwater data and analyze for additional parameters (i.e., per- and polyfluoroalkyl substances [PFAS] and 1,4-dioxane) to meet NYSDEC DER-10 requirements for remedial investigations.

Four two-inch permanent monitoring wells will be installed to approximately 15 ft bgs or to at least five feet below the groundwater interface (if encountered at a shallower depth). Groundwater was encountered at approximately 10 ft bgs during the previous Limited Phase II ESA completed in May 2022. Wells will be screened from approximately 5 to 15 ft bgs and screen will straddle the groundwater interface. Monitoring wells will have a 2-inch annular space and be installed using either #0 or #00 certified clean sand fill. Monitoring wells will be developed after installation by surging a pump in the well several times to pull fine-grained material from the well. Development will be completed until the water turbidity is 50 nephelometric turbidity units (NTU) or less or ten well volumes are removed, if possible. Groundwater sampling will occur at a minimum of one week after monitoring well installation and development. The well casings will be surveyed by a New York State licensed surveyor and gauged during a round of synoptic groundwater depth readings to facilitate the preparation of a groundwater contour map and to determine the direction of groundwater flow.

The sampling and analysis plan is summarized in Table 1. Proposed and existing monitoring well locations are provided in Figure 2.

Monitoring wells will be sampled and analyzed for:

- TCL VOCs using EPA method 8260B;
- TCL SVOCs using EPA method 8270C;
- Total Metals using EPA methods 6010/7471;
- Dissolved Metals using EPA methods 6010/7471;
- TCL Pesticides using EPA method 8081B;
- PCBs using EPA method 8082
- PFAS using EPA method 1633; and
- 1,4-Dioxane using EPA method 8270 SIM.

Samples to be analyzed for PFAS and 1,4-dioxane will be collected and analyzed in accordance with the NYSDEC issued November 2022 "Sampling, Analysis and Assessment of PFAS" and the November 2022 Sampling for "1,4-dioxane and Per- and Polyfluoroalkyl Substances (PFAS) Under DECs Part 375 Remedial Programs," respectively.

Groundwater wells will be sampled using low-flow sampling methods described in the Field Sampling Plan (FSP). Following the low-flow purge, samples will be collected from monitoring wells for analysis of the analytes mentioned above.

The FSP presented in Appendix B details field procedures and protocols that will be followed during field activities. The QAPP presented in Appendix C details the analytical methods and procedures that will be used to analyze samples collected during field activities. Select wells will be sampled for PFAS following the purge and sampling method detailed in the NYSDEC guidance documents (see Appendix D).

NAPL/GCM EVALUATION

The following will be conducted to investigate the potential for the presence of non-aqueous phase liquid/grossly contaminated material (NAPL/GCM) at the Site.

Four of the eight proposed soil borings, including SB-1, SB-3, SB-7, and SB-8, will be installed to at least 100 ft bgs to investigate the potential for the presence of NAPL/GCM. Soil samples will be collected from these soil borings from 0 to 0.5 ft bgs, 1 to 2 ft bgs, and at the groundwater interface (anticipated at approximately 10 ft bgs). Boring locations are shown on Figure 4. For soil borings where GCM/NAPL has been observed, grab soil samples will be collected at and immediately below each distinct interval of GCM/NAPL and will be analyzed for the full suite TCL/TAL, plus cyanide. If GCM is observed but the presence of NAPL is not readily determined, a shake test will be performed per the Field Descriptions of Samples for Former Manufactured Gas Plant (MGP) Sites (Appendix G). Final soil boring depths will be determined based on field observations of GCM/NAPL using the Field Descriptions of Samples for Former MGP Sites. If GCM/NAPL is not observed in the bottom 10 feet of the soil boring and the minimum required depth is achieved, no further advancement of the boring is required. If GCM/NAPL is observed in accordance with the Field Descriptions of Samples for Former MGP Sites, the boring will be advanced until vertical delineation of GCM/NAPL has been completed, which is a minimum of 10 feet of material without evidence of GCM/NAPL. Final vertical delineation can only be determined if soil borings have a minimum recovery of 50%.

If GCM/NAPL is identified in soil borings noted above, additional investigation will be required to delineate the full extent of GCM/NAPL. Soil borings shall be advanced 20 feet north, south, east, and west in the horizontal direction from parent soil borings where GCM/NAPL was observed. To ensure vertical delineation of GCM/NAPL, the new borings will be advanced to a minimum depth of where GCM/NAPL was observed in the parent boring. Final soil boring depths will be determined based on field observations of GCM/NAPL using the Field Descriptions of Samples for Former MGP Sites. If GCM/NAPL is not observed in the final 10 feet of the soil boring and the minimum required depth is achieved, no further advancement of the boring is required. If GCM/NAPL is observed, the boring will be advanced until vertical delineation of GCM/NAPL has been determined, which is a minimum of 10 feet of material without evidence of GCM/NAPL. Should other contamination be found, soil samples will be collected from 0 to 0.5 ft bgs, 1 to 2 ft bgs, and at the groundwater interface. For soil borings where GCM/NAPL has been observed, grab soil samples will be collected at and immediately below each distinct interval of GCM/NAPL and will be analyzed for the full suite TCL/TAL, plus cyanide. All preliminary analytical results and draft soil boring logs will be submitted to NYSDEC to facilitate review of delineation. Delineation will only be deemed completed upon receipt of NYSDEC concurrence and approval.

If NAPL is identified in a soil boring by the presence of saturated material or free phase product, to delineate groundwater contamination associated with GCM/NAPL, monitoring wells will be installed at soil boring locations directly downgradient of where GCM/NAPL is observed. At each location, one monitoring well will be installed and screened at the groundwater interface and a second monitoring well will be installed and screened below the deepest observation of GCM/NAPL. Monitoring wells will be installed in accordance with the NYSDEC Guidelines on Installation of Overburden Wells (Monitoring Wells) for Environmental Investigations. Any observations of sheen, blebs, free-phase product/tar, staining or coating of the sampling equipment, odor, etc. made during sampling of groundwater are to be included in the groundwater sample collection log. If NAPL is observed in the well at the time of sampling, NAPL thickness will be documented in sampling logs and a sample of the NAPL will be collected for TAL VOCs and TAL SVOCs. NAPL will then be removed prior to groundwater sample collection. Groundwater samples will be collected for full suite TCL/TAL, plus cyanide.

A synoptic groundwater elevation gauging event will be performed following the installation and development of groundwater monitoring wells. Monitoring well locations will be surveyed by a licensed surveyor and tied into the NAVD88 datum. Monitoring well construction data, groundwater elevation, and surveyed locations in NAVD88 will be submitted electronically to the NYSDEC EQuIS database. All preliminary analytical results and draft groundwater sampling logs will be submitted to NYSDEC as soon as they are available to facilitate a timely review of delineation. Delineation will only be deemed completed upon receipt of NYSDEC concurrence and approval.

If NAPL is identified in a soil boring by the presence of saturated material or free phase product, NAPL mobility will be assessed. To assess NAPL mobility, 2” PVC wells will be installed screened over the impacted interval. The screen must be slotted 0.02-inches. Wells will have minimum annular space of two inches around the entire monitoring well circumference, have a sand pack a minimum of 2-ft above the top of the monitoring well screen, and have a bentonite seal a minimum of 2-ft thick. A minimum of a five (5) foot sump will be installed below the screened interval. Wells will be monitored no sooner than 7 days post development for NAPL. Any observations of sheen, blebs, free-phase product, staining or coating of the sampling equipment, odor, etc. that are made during sampling of groundwater will be included in a log. Monitoring well locations will be surveyed by a licensed surveyor and tied into the NAVD88 datum. Monitoring well construction data, and surveyed locations in NAVD88 will be submitted to the NYSDEC EQuIS database. NAPL mobility observations will be submitted to NYSDEC in draft to facilitate review of assessment. In areas where significant amounts of fill will be placed to raise the grade and/or building construction may result in significant loading and/or vibration to the subsurface, NAPL monitoring (and provisions for NAPL collection and removal) must be implemented throughout and beyond development to ensure NAPL isn't mobilized, nor migrates off-site. The mobility assessment will only be deemed completed upon receipt of NYSDEC concurrence and approval.

3.5 INVESTIGATION DERIVED WASTE

Following sample collection, soil cuttings from boreholes will be collected and handled as investigation derived waste (IDW). Boreholes will be restored to grade with the surrounding area. Soil cuttings will be placed into a sealed and labeled Department of Transportation (DOT) approved 55-gallon drum pending characterization and off-Site disposal. Decontamination fluids will be contained and placed in labeled DOT approved 55-gallon drums pending characterization and off-site disposal. Groundwater purged from the monitoring wells during development and sample collection will be placed into a DOT approved 55-gallon drum pending off-Site disposal. Trucks and vehicles that come into contact with impacted materials during the RI activities will be decontaminated on-site and debris and decontamination water will be treated as IDW.

3.6 SOIL VAPOR SAMPLING

Samples will be collected in accordance with the New York State Department of Health (NYSDOH) Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York (NYSDOH October 2006). Seven soil vapor probes will be installed to approximately 7 to 8 ft bgs or approximately 2 feet above the groundwater interface. The vapor implants will be installed with a direct-push drilling rig (e.g., Geoprobe®) to advance a stainless-steel probe to the desired sample depth. Sampling will occur for the duration of two hours.

Samples will be collected in appropriately sized Summa® canisters that have been certified clean by the laboratory, and samples will be analyzed by using United States Environmental Protection Agency (USEPA) Method TO-15. Flow rate for both purging and sampling will not exceed 0.2 L/min. Sampling methods are described in the Field Sampling Plan (FSP) provided as Appendix B.

3.7 PROPOSED SAMPLING RATIONALE

Haley & Aldrich has proposed the sample plan described herein and as shown in Figure 2, in consideration of the data generated during the previous investigations conducted at the Site. Previously, an investigation was performed in May 2022 to identify contamination at the Site. A Limited Phase II ESA detected elevated VOC, SVOC and metal concentrations in soil samples collected throughout the Site. The sampling map from this Limited Phase II ESA (included in Appendix A) shows data gaps throughout the Site, including a lack of analytical data for potentially high-risk areas that may have been impacted during historical Site operations. In order to properly characterize the Site and identify potential source areas, all phases of media will be comprehensively investigated as part of this RI and data gaps will be evaluated.

In addition, the Remedial Investigations detected petroleum related VOCs including benzene, toluene, ethylbenzene and xylenes (BTEX) and CVOCs in soil vapor concentrations indicating source material contamination which was not identified to date. These findings require additional investigation to ascertain and delineate on Site source(s) of the VOCs.

The Proposed Sample Location Map (included as Figure 2) is designed to generate sufficient data to identify the source of contamination and classify subsurface conditions throughout the Site, as a whole, with a particular focus on sample locations in areas of the Site that have historically revealed evidence of contamination.

4. Quality Assurance and Quality Control

Quality Assurance/Quality Control (QA/QC) procedures will be used to provide performance information with regard to the accuracy, precision, sensitivity, representation, completeness, and comparability associated with the sampling and analysis for this investigation. Field QA/QC procedures will be used (1) to document that samples are representative of actual conditions at the Site and (2) identify possible cross-contamination from field activities or sample transit. Laboratory QA/QC procedures and analyses will be used to demonstrate whether analytical results have been biased either by interfering compounds in the sample matrix or by laboratory techniques that may have introduced systematic or random errors to the analytical process.

QA/QC procedures are defined in the QAPP included in Appendix C.

5. Data Use

5.1 DATA SUBMITTAL

Analytical data will be supplied in ASP Category B Data Packages. If more stringent than those suggested by the United States Environmental Protection Agency, the laboratory’s in-house QA/QC limits will be utilized. Validated data will be submitted to the NYSDEC EQuIS database in an EDD package.

5.2 DATA VALIDATION

Data packages will be sent to a qualified data validation specialist to evaluate the accuracy and precision of the analytical results. A Data Usability Summary Report (DUSR) will be created to confirm the compliance of methods with the protocols described in the NYSDEC Analytical service Protocol (ASP). DUSRs will summarize and confirm the usability of the data for project-related decisions. Data validation will be completed in accordance with the DUSR guidelines from the NYSDEC Division of Environmental Remediation. DUSRs will be included with the submittal of a Remedial Investigation Report (RIR), further discussed in Section 8.

6. Project Organization

A project team for the Site has been created based on qualifications and experience with personnel suited for successfully completing the project.

The NYSDEC designated Case Manager, Marnie Chancey, will be responsible for overseeing the successful completion of the project work and adherence to the work plan on behalf of NYSDEC.

The NYSDOH designated Case Manager, Johnathan Robinson, will be responsible for overseeing the successful completion of the project work and adherence to the work plan on behalf of NYSDOH.

James Bellew will be the Principal in Charge for this work. In this role, Mr. Bellew will be responsible for the overall completion of each task.

Mari Conlon, P.G. will be the Project Manager and Qualified Environmental Professional (QEP) for this work. In this role, Ms. Conlon will manage the day-to-day tasks including coordination and supervision of field engineers and scientists, adherence to the work plan and oversight of project schedule. As the Project Manager, Ms. Conlon will also be responsible for communications with the NYSDEC Case Manager regarding project status, schedule, issues, and updates for project work. As the QEP Ms. Conlon will ensure all tasks are completed as per requirements outlined in this work plan and in accordance with the DER-10 guidance.

Elizabeth Scheuerman will be the Assistant Project Manager for this work and will also act as the Quality Assurance Officer (QAO). The QAO will assure the application and effectiveness of the QAPP by the analytical laboratory and the project staff, provide input to field team as to corrective actions that may be required as a result of the above-mentioned evaluations and prepare and/or review data validation and audit reports.

PJ DiNardo will be the field engineer responsible for implementing the field effort for this work. Mr. DiNardo’s responsibilities will include implementing the work plan activities and directing the subcontractors to ensure successful completion of all field activities.

The drilling subcontractor will be Lakewood Environmental Services Corp. (Lakewood Environmental). Lakewood Environmental will provide a Geoprobe operator to implement the scope of work in this RIWP.

The analytical laboratory will be Alpha Analytical of Westborough, MA, a New York Environmental Laboratory Approval Program (ELAP) certified laboratory. Alpha Analytical will be responsible for analyzing samples as per the analyses and methods identified in Section 2.

7. Health and Safety

7.1 HEALTH AND SAFETY PLAN

A Site-specific Health and Safety Plan (HASP) has been prepared in accordance with NYSDEC and NYSDOH guidelines and is provided as Appendix E of this work plan. The HASP includes a description of health and safety protocols to be followed by Haley & Aldrich field staff during implementation of the remedy, including monitoring within the work area, along with response actions should impacts be observed. The HASP has been developed in accordance with Occupational Health and Safety Administration (OSHA) 40 CFR Part 1910.120 regulatory requirements for use by Haley & Aldrich field staff that will work at the Site during planned activities. Contractors or other personnel who perform work at the Site are required to develop their own health and safety plan and procedures of comparable or higher content for their respective personnel in accordance with relevant OSHA regulatory requirements for work at hazardous waste sites as well as the general industry as applicable based on the nature of work being performed.

7.2 COMMUNITY AIR MONITORING PLAN

The proposed investigation work will be completed outdoors at the Site. Where intrusive drilling operations are planned, community air monitoring will be implemented to protect downwind receptors. A Haley & Aldrich representative will continually monitor the breathing air in the vicinity of the immediate work area using a PID to measure total volatile organic compounds in the air at concentrations as low as 1 part per million (ppm). The air in the work zone also will be monitored for visible dust generation.

If VOC measurements above 5 ppm are sustained for 15 minutes or visible dust generation is observed, the intrusive work will be temporarily halted, and a more rigorous monitoring of VOCs and dust using recordable meters will be implemented in accordance with the NYSDOH Generic Community Air Monitoring Plan (CAMP). The NYSDEC and NYSDOH will be notified as close to immediately after any CAMP exceedances as possible. Notification will also include the reason for exceedance, what was done to address the exceedance and if the action was effective. CAMP data will be provided to NYSDEC in the daily reports, further detailed in Section 8. The NYSDOH CAMP guidance document is included as Appendix F.

When work areas are within 20 feet of potentially exposed populations or occupied structures, the continuous monitoring locations for VOCs and particulates must reflect the nearest potentially exposed individuals and the location of ventilation system intakes for nearby structures. The use of engineering controls such as vapor/dust barriers, temporary negative pressure enclosures, or special ventilation devices should be considered to prevent exposures related to the work activities and to control dust and odors. Consideration should be given to implementing the planned activities when potentially exposed populations are at a minimum, such as during weekends or evening hours in non-residential settings.

- If total VOC concentrations opposite the walls of occupied structures or next to intake vents exceed 1 ppm, monitoring should occur within the occupied structure(s). Background readings in the occupied spaces must be taken prior to commencement of the planned work. Any unusual background readings should be discussed with NYSDOH prior to commencement of the work.

- If total particulate concentrations opposite the walls of occupied structures or next to intake vents exceed 150 mcg/m3, work activities should be suspended until controls are implemented and are successful in reducing the total particulate concentration to 150 mcg/m3 or less at the monitoring point.
- Depending upon the nature of contamination and remedial activities, other parameters (e.g., explosivity, oxygen, hydrogen sulfide, carbon monoxide) may also need to be monitored. Response levels and actions should be pre-determined, as necessary, for each site.

7.3 QUALITATIVE HUMAN HEALTH EXPOSURE ASSESSMENT (QHHEA)

A comprehensive QHHEA (on-Site and off-Site) will be performed following the collection of all RI data. The exposure assessment will be performed in accordance with Section 3.3(c)4 of DER-10 and the NYSDOH guidance for performing a qualitative EA (DER-10; Appendix 3B). The results of the QHHEA will be provided in the RIR. According to Section 3.10 of DER-10, and the Fish and Wildlife Resources Impact Analysis Decision Key in DER-10 Appendix 3C, a Fish and Wildlife exposure assessment will be performed (if needed) based on the results of the RI results.

8. Reporting

Daily reports will be submitted to NYSDEC and NYSDOH summarizing the Site activities completed during the remedial investigation. Daily reports will include a Site figure, a description of Site activities, a photo log, and CAMP data. Daily reports will be submitted the following morning after Site work is completed.

Following the completion of the work, a summary of the RI will be provided to NYSDEC in a Remedial Investigation Report (RIR) to support the implementation of proposed remedial action. The report will include:

- Summary of the RI activities;
- Figure showing sampling locations;
- Tables summarizing laboratory analytical results;
- Laboratory analytical data reports;
- Field sampling data sheets;
- Findings regarding the nature and extent of contamination at the Site; and
- Conclusions and recommendations.

9. Schedule

The Site owner plans to implement this RIWP promptly after approval of this RIWP.

Anticipated RI Schedule	
BCP Application, RIWP and 30-Day Public Comment Period (Concurrent with BCP application)	September 2022 – January 2023
Executed Brownfield Cleanup Agreement	February 2023
NYSDEC Approval of RIWP	February 2023
RI Implementation	March 2023
RIR/RAWP Submittal and 45-Day Public Comment Period	April-May 2023
NYSDEC Approval of RIR/RAWP	May-June 2023

References

1. Brownfield Cleanup Program Application. Former A&A Brake Service Site, Brooklyn, New York. Prepared by Sackett Heights LLC & Haley & Aldrich of New York, prepared for the New York State Department of Environmental Conservation. Submitted September 2022.

2. Phase I Environmental Site Assessment Report, 558-562 Sacket Street, Brooklyn, New York. Prepared by Brussee Environmental Corp., prepared for Moundfield Equities, May 2022.

3. Limited Phase II Environmental Site Assessment. 558 Sackett Street, Brooklyn, New York. Prepared by Brussee Environmental Corp., prepared for Moundfield Equities, May 2022.

4. Program Policy DER-10, “Technical Guidance for Site Investigation and Remediation,” New York State Department of Environmental Conservation, May 2010.

5. New York State Department of Health (NYSDOH) Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York (October 2006).

TABLES

Table 1. Sample and Analysis Plan

558 Sackett Street
Brooklyn, New York

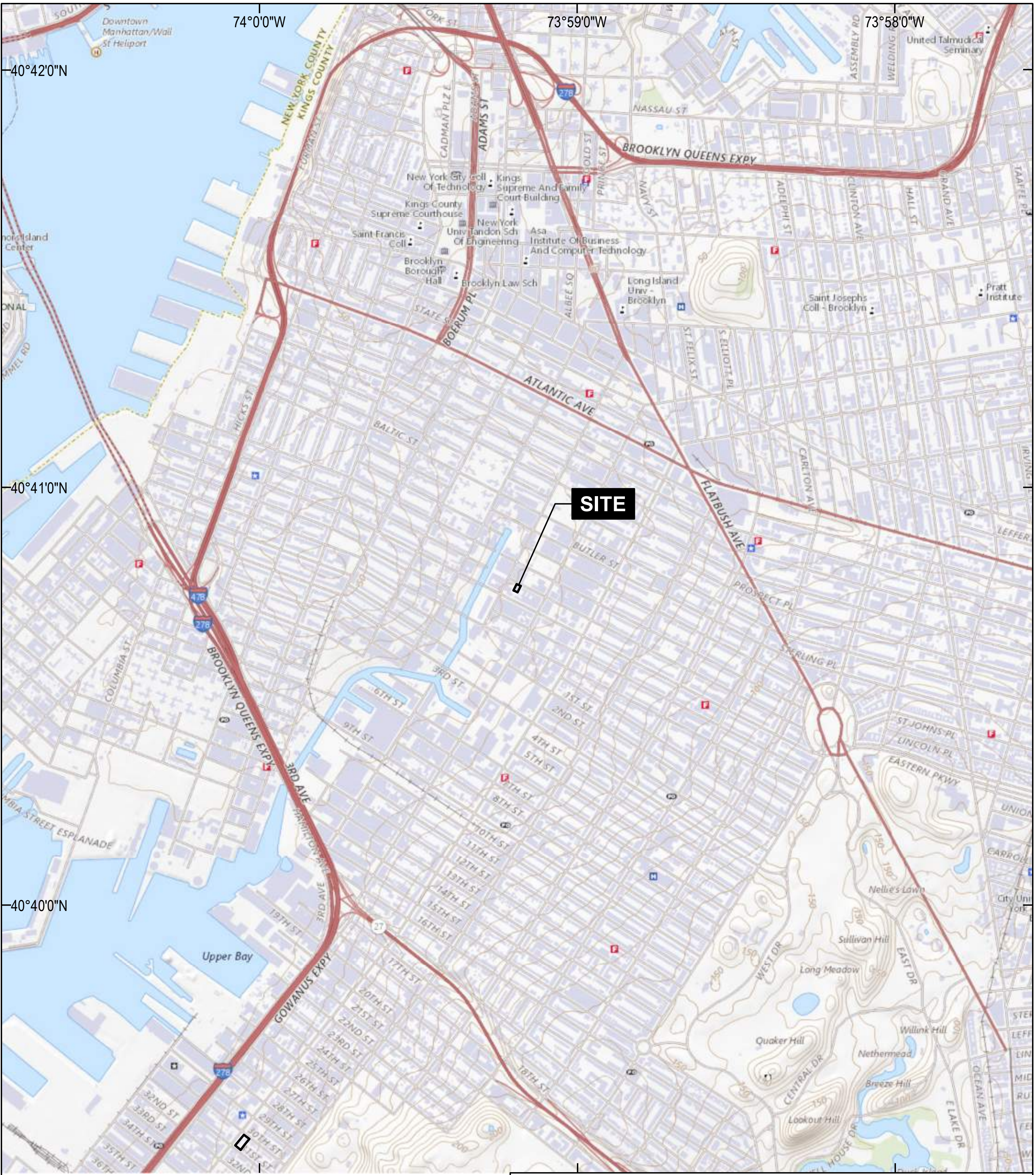
Boring Number	Sample Depth	Target Compound List VOCs (8260B)	Target Compound List SVOCs (8270C)	Total Analyte List Metals (6010)	PCBs (8082)	Pesticides (8081B)	PFAS (1633)	1,4-Dioxane (8270 SIM)	VOCs (TO-15)
SOIL									
SB-1	0-0.5'	X	X	X	X	X	X	X	
	1-2'	X	X	X	X	X	X	X	
	5-7'	X	X	X	X	X	X	X	
	Groundwater Interface	X	X	X	X	X	X	X	
	12-14'	X	X	X	X	X	X	X	
SB-2	0-0.5'	X	X	X	X	X	X	X	
	5-7'	X	X	X	X	X	X	X	
	12-14'	X	X	X	X	X	X	X	
SB-3	0-0.5'	X	X	X	X	X	X	X	
	1-2'	X	X	X	X	X	X	X	
	5-7'	X	X	X	X	X	X	X	
	Groundwater Interface	X	X	X	X	X	X	X	
	12-14'	X	X	X	X	X	X	X	
SB-4	0-0.5'	X	X	X	X	X	X	X	
	5-7'	X	X	X	X	X	X	X	
	12-14'	X	X	X	X	X	X	X	
SB-5	0-0.5'	X	X	X	X	X	X	X	
	5-7'	X	X	X	X	X	X	X	
	12-14'	X	X	X	X	X	X	X	
SB-6	0-0.5'	X	X	X	X	X	X	X	
	5-7'	X	X	X	X	X	X	X	
	12-14'	X	X	X	X	X	X	X	
SB-7	0-0.5'	X	X	X	X	X	X	X	
	1-2'	X	X	X	X	X	X	X	
	5-7'	X	X	X	X	X	X	X	
	Groundwater Interface	X	X	X	X	X	X	X	
	12-14'	X	X	X	X	X	X	X	
SB-8	0-0.5'	X	X	X	X	X	X	X	
	1-2'	X	X	X	X	X	X	X	
	5-7'	X	X	X	X	X	X	X	
	Groundwater Interface	X	X	X	X	X	X	X	
	12-14'	X	X	X	X	X	X	X	
GROUNDWATER									
MW-1	-	X	X	X	X	X	X	X	
MW-2	-	X	X	X	X	X	X	X	
MW-3	-	X	X	X	X	X	X	X	
MW-4	-	X	X	X	X	X	X	X	
SOIL VAPOR									
SV-1	7-8'								X
SV-2	7-8'								X
SV-3	7-8'								X
SV-4	7-8'								X
SV-5	7-8'								X
SV-6	7-8'								X
SV-7	7-8'								X

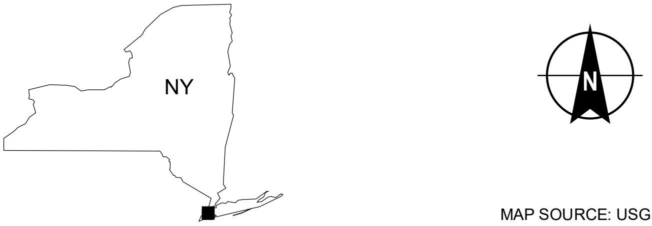
Notes:	QAQC samples include:
VOCs - Volatile Organic Compounds	MS/MSD - 1 for every 20 samples
SVOCs - Semi-volatile Organic Compounds	Field Duplicate - 1 for every 20 samples
PCBs - Polychlorinated biphenyls	Trip Blanks - 1 per cooler of samples to be analyzed for VOCs
PFAS - Per- and Polyfluoroalkyl Substances	Field Blanks - 1 for every 20 samples

Groundwater samples to be run for total and dissolved metals

Soil Borings SB-1, SB-3, SB-7, and SB-8 will be installed to 100 ft bgs as part of the NAPL/GCM investigation. Additional soil samples will be collected if NAPL/GCM is observed.

FIGURES





MAP SOURCE: USGS
SITE COORDINATES: 40°40'45"N, 73°59'10"W

HALEY ALDRICH

558 SACKETT STREET
BROOKLYN, NEW YORK

PROJECT LOCUS

APPROXIMATE SCALE: 1 IN = 2000 FT
SEPTEMBER 2022

FIGURE 1

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LEGEND

⊕ PROPOSED MONITORING WELL/SOIL BORING LOCATION

◒ PROPOSED SOIL BORING LOCATION

△ PROPOSED SOIL VAPOR SAMPLE LOCATION

BRUSEE ENVIRONMENTAL CORP., MAY 2022

⊕ MONITORING WELL/SOIL BORING SAMPLE LOCATION

◒ SOIL BORING SAMPLE LOCATION

△ SOIL VAPOR SAMPLE LOCATION

▭ PARCEL BOUNDARY

▭ SITE BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. ASSESSOR PARCEL DATA SOURCE: NYC DEPARTMENT OF CITY PLANNING
3. AERIAL IMAGERY SOURCE: NEARMAP, 19 JULY 2022
4. SOIL BORINGS SB-1, SB-3, SB-7 AND SB-8 WILL BE ADVANCED TO 100 FT BGS AS PART OF HTE NAPL/GCM INVESTIGATION

HALEY ALDRICH

REMEDIAL INVESTIGATION WORK PLAN
558 SACKETT STREET
BROOKLYN, NEW YORK

PROPOSED SAMPLING LOCATION MAP

FEBRUARY 2023

FIGURE 2

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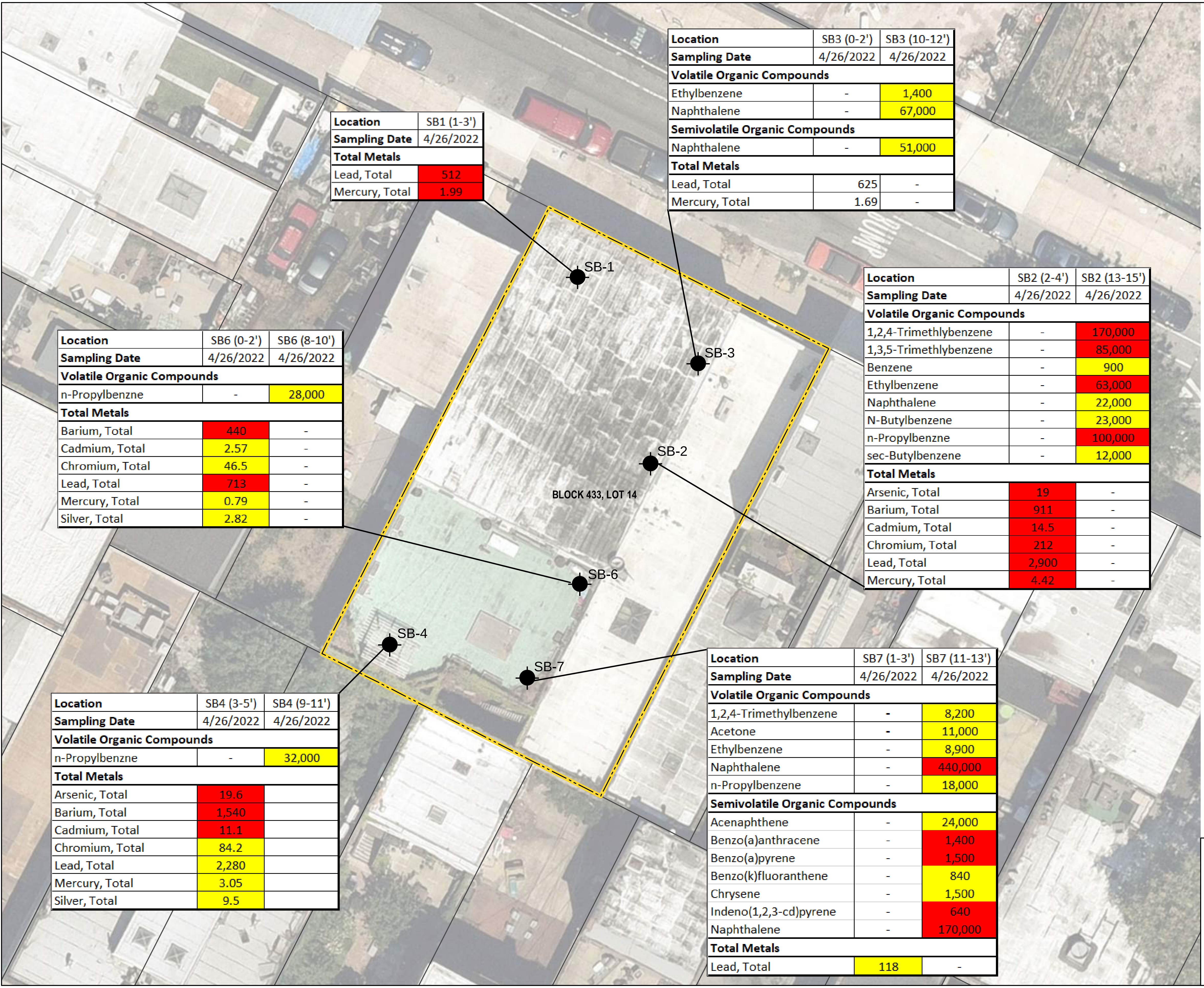

Location	SB1 (1-3')
Sampling Date	4/26/2022
Total Metals	
Lead, Total	512
Mercury, Total	1.99

Location	SB3 (0-2')	SB3 (10-12')
Sampling Date	4/26/2022	4/26/2022
Volatile Organic Compounds		
Ethylbenzene	-	1,400
Naphthalene	-	67,000
Semivolatile Organic Compounds		
Naphthalene	-	51,000
Total Metals		
Lead, Total	625	-
Mercury, Total	1.69	-

Location	SB6 (0-2')	SB6 (8-10')
Sampling Date	4/26/2022	4/26/2022
Volatile Organic Compounds		
n-Propylbenzne	-	28,000
Total Metals		
Barium, Total	440	-
Cadmium, Total	2.57	-
Chromium, Total	46.5	-
Lead, Total	713	-
Mercury, Total	0.79	-
Silver, Total	2.82	-

Location	SB2 (2-4')	SB2 (13-15')
Sampling Date	4/26/2022	4/26/2022
Volatile Organic Compounds		
1,2,4-Trimethlybenzene	-	170,000
1,3,5-Trimethlybenzene	-	85,000
Benzene	-	900
Ethylbenzene	-	63,000
Naphthalene	-	22,000
N-Butylbenzene	-	23,000
n-Propylbenzne	-	100,000
sec-Butylbenzene	-	12,000
Total Metals		
Arsenic, Total	19	-
Barium, Total	911	-
Cadmium, Total	14.5	-
Chromium, Total	212	-
Lead, Total	2,900	-
Mercury, Total	4.42	-

Location	SB4 (3-5')	SB4 (9-11')
Sampling Date	4/26/2022	4/26/2022
Volatile Organic Compounds		
n-Propylbenzne	-	32,000
Total Metals		
Arsenic, Total	19.6	
Barium, Total	1,540	
Cadmium, Total	11.1	
Chromium, Total	84.2	
Lead, Total	2,280	
Mercury, Total	3.05	
Silver, Total	9.5	

Location	SB7 (1-3')	SB7 (11-13')
Sampling Date	4/26/2022	4/26/2022
Volatile Organic Compounds		
1,2,4-Trimethlybenzene	**-**	8,200
Acetone	**-**	11,000
Ethylbenzene	-	8,900
Naphthalene	-	440,000
n-Propylbenzene	-	18,000
Semivolatile Organic Compounds		
Acenaphthene	-	24,000
Benzo(a)anthracene	-	1,400
Benzo(a)pyrene	-	1,500
Benzo(k)fluoranthene	-	840
Chrysene	-	1,500
Indeno(1,2,3-cd)pyrene	-	640
Naphthalene	-	170,000
Total Metals		
Lead, Total	118	-

LEGEND

▭	PARCEL BOUNDARY
▭	SITE BOUNDARY
●	SOIL BORING FROM APRIL 2022 PHASE II ESA PERFORMED BY BRUSSEE ENVIRONMENTAL

Analyte	Units	NY-RESRR	NY-UNRES
Semivolatile Organic Compounds			
Acenaphthene	µg/kg	100,000	20,000
Benzo(a)anthracene	µg/kg	1,000	1,000
Benzo(a)pyrene	µg/kg	1,000	1,000
Benzo(k)fluoranthene	µg/kg	3,900	800
Chrysene	µg/kg	3,900	1,000
Indeno(1,2,3-cd)pyrene	µg/kg	500	500
Naphthalene	µg/kg	100,000	12,000
Total Metals			
Arsenic, Total	mg/kg	16	13
Barium, Total	mg/kg	400	350
Cadmium, Total	mg/kg	4.3	2.5
Chromium, Total	mg/kg	180	30
Lead, Total	mg/kg	400	63
Mercury, Total	mg/kg	0.81	0.18
Silver, Total	mg/kg	180	2
Volatile Organic Compounds			
1,2,4-Trimethlybenzene	µg/kg	52,000	3,600
1,3,5-Trimethlybenzene	µg/kg	52,000	84,000
Acetone	µg/kg	100,000	50
Benzene	µg/kg	4,800	60
Ethylbenzene	µg/kg	41,000	1,000
Naphthalene	µg/kg	100,000	12,000
n-Butylbenzene	µg/kg	100,000	12,000
n-Propylbenzne	µg/kg	100,000	3,900
sec-Butylbenzene	µg/kg	100,000	11,000

1.Yellow shaded results exceed Unrestricted SCOs.
2.Red shaded results exceed both Unrestricted and Restricted Residential SCOs.
3.NY-RESRR: New York NYCRR Part 375 Restricted-Residential Criteria, New York Restricted use Criteria per 6 NYCRR Part 375 Environmental Remediation Programs, effective December 14, 2006.
4.NY-UNRES: New York NYCRR Part 375 New York Unrestricted use Criteria Criteria per 6 NYCRR Part 375 Environmental Remediation Programs, effective December 14, 2006.
5.The units are mg/kg (Milligrams per kilogram) and ug/kg (Micrograms per kilogram).

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. ASSESSOR PARCEL DATA SOURCE: NYC DEPARTMENT OF CITY PLANNING
3. AERIAL IMAGERY SOURCE: NEARMAP, 19 JULY 2022

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HALEY ALDRICH

REMEDIAL INVESTIGATION WORK PLAN
558 SACKETT STREET
BROOKLYN, NEW YORK

MAP OF SOIL CHEMISTRY

AUGUST 2022

FIGURE 3

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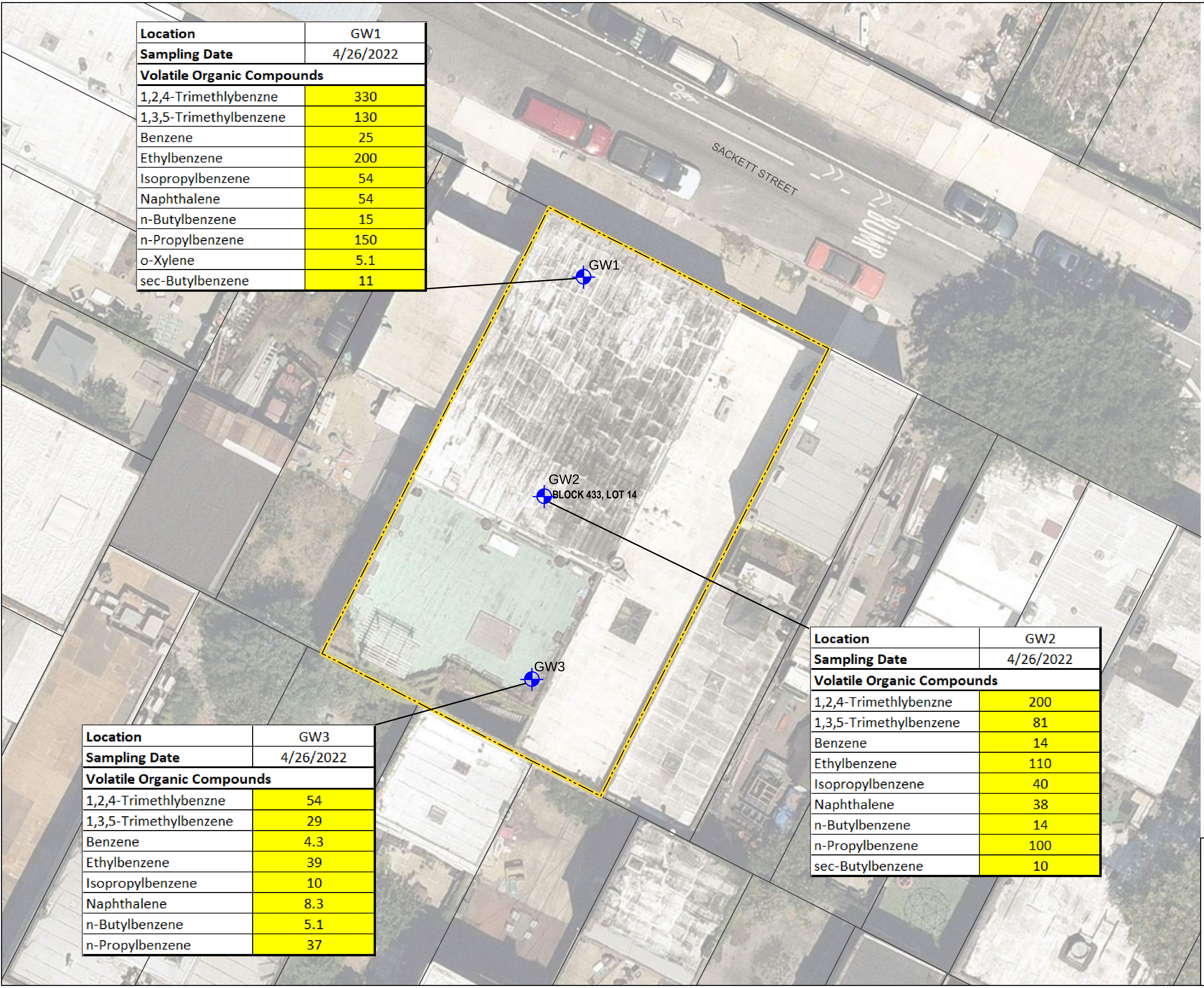

Location	GW1
Sampling Date	4/26/2022
Volatile Organic Compounds	
1,2,4-Trimethlybenzne	330
1,3,5-Trimethylbenzene	130
Benzene	25
Ethylbenzene	200
Isopropylbenzene	54
Naphthalene	54
n-Butylbenzene	15
n-Propylbenzene	150
o-Xylene	5.1
sec-Butylbenzene	11

Location	GW2
Sampling Date	4/26/2022
Volatile Organic Compounds	
1,2,4-Trimethylbenzene	200
1,3,5-Trimethylbenzene	81
Benzene	14
Ethylbenzene	110
Isopropylbenzene	40
Naphthalene	38
n-Butylbenzene	14
n-Propylbenzene	100
sec-Butylbenzene	10

Location	GW3
Sampling Date	4/26/2022
Volatile Organic Compounds	
1,2,4-Trimethylbenzene	54
1,3,5-Trimethylbenzene	29
Benzene	4.3
Ethylbenzene	39
Isopropylbenzene	10
Naphthalene	8.3
n-Butylbenzene	5.1
n-Propylbenzene	37

LEGEND

▭	PARCEL BOUNDARY
▭	SITE BOUNDARY
⌖	GROUNDWATER MONITORING WELL FROM APRIL 2022 PHASE II ESA PERFORMED BY BRUSSEE ENVIRONMENTAL

Ambient Water Quality (New York State Groundwater Effluent Limitations for Class GA Groundwater)

Analyte	Value	Unit
1,2,4-Trimethylbenzene	5	µg/L
1,3,5-Trimethylbenzene	5	µg/L
Benzene	1	µg/L
Ethylbenzene	5	µg/L
Isopropylbenzene	5	µg/L
Naphthalene	10	µg/L
n-Butylbenzene	5	µg/L
n-Propylbenzene	5	µg/L
o-Xylene	5	µg/L
sec-Butylbenzene	5	µg/L

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. ASSESSOR PARCEL DATA SOURCE: NYC DEPARTMENT OF CITY PLANNING
3. AERIAL IMAGERY SOURCE: NEARMAP, 19 JULY 2022
4. GROUNDWATER ANALYTICAL RESULTS COMPARED TO NYSDEC TECHNICAL AND OPERATIONAL GUIDANCE SERIES (TOGS) 1.1.1 AMBIENT WATER QUALITY STANDARDS AND GUIDANCE VALUES FOR CLASS A DRINKING WATER.
5. RESULTS SHOWN IN MICROGRAMS PER LITER (ug/L)
6. RESULTS IN EXCEEDANCE OF NYSDEC TOGS AWQS ARE HIGHLIGHTED

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SCALE IN FEET

HALEY ALDRICH

REMEDIAL INVESTIGATION WORK PLAN
558 SACKETT STREET
BROOKLYN, NEW YORK

MAP OF GROUNDWATER CHEMISTRY

AUGUST 2022

FIGURE 4

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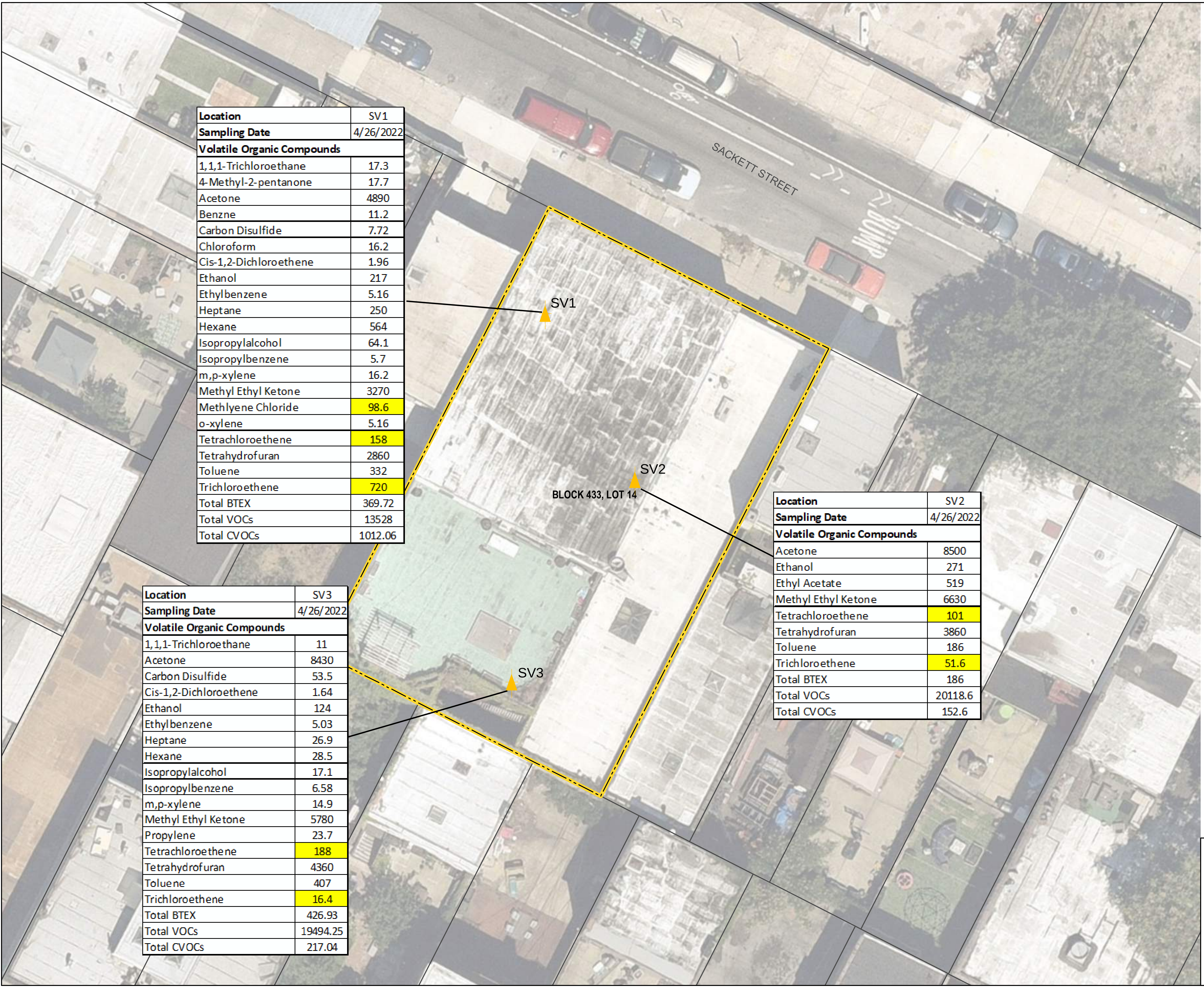

Location	SV1
Sampling Date	4/26/2022
Volatile Organic Compounds	
1,1,1-Trichloroethane	17.3
4-Methyl-2-pentanone	17.7
Acetone	4890
Benzne	11.2
Carbon Disulfide	7.72
Chloroform	16.2
Cis-1,2-Dichloroethene	1.96
Ethanol	217
Ethylbenzene	5.16
Heptane	250
Hexane	564
Isopropylalcohol	64.1
Isopropylbenzene	5.7
m,p-xylene	16.2
Methyl Ethyl Ketone	3270
Methlyene Chloride	98.6
o-xylene	5.16
Tetrachloroethene	158
Tetrahydrofuran	2860
Toluene	332
Trichloroethene	720
Total BTEX	369.72
Total VOCs	13528
Total CVOCs	1012.06

Location	SV2
Sampling Date	4/26/2022
Volatile Organic Compounds	
Acetone	8500
Ethanol	271
Ethyl Acetate	519
Methyl Ethyl Ketone	6630
Tetrachloroethene	101
Tetrahydrofuran	3860
Toluene	186
Trichloroethene	51.6
Total BTEX	186
Total VOCs	20118.6
Total CVOCs	152.6

Location	SV3
Sampling Date	4/26/2022
Volatile Organic Compounds	
1,1,1-Trichloroethane	11
Acetone	8430
Carbon Disulfide	53.5
Cis-1,2-Dichloroethene	1.64
Ethanol	124
Ethylbenzene	5.03
Heptane	26.9
Hexane	28.5
Isopropylalcohol	17.1
Isopropylbenzene	6.58
m,p-xylene	14.9
Methyl Ethyl Ketone	5780
Propylene	23.7
Tetrachloroethene	188
Tetrahydrofuran	4360
Toluene	407
Trichloroethene	16.4
Total BTEX	426.93
Total VOCs	19494.25
Total CVOCs	217.04

LEGEND

☐	PARCEL BOUNDARY
▭	SITE BOUNDARY
▲	SOIL VAPOR POINT FROM APRIL 2022 PHASE II ESA PERFORMED BY BRUSSEE ENVIRONMENTAL

New York DOH Air Guidance Values Concentrations Criteria per Guidance for Evaluating Soil Vapor Intrusion, October 2006, and updated May 2017.

Volatile Organics in Air	NYSDOH AGVs	Units
1,1,1-Trichloroethene	-	μg/m^3
Acetone	-	μg/m^3
Cis-1,2-Dichloroethene	-	μg/m^3
Methylene Chloride	60	μg/m^3
Tetrachloroethene	30	μg/m^3
Trichloroethene	2	μg/m^3

NOTES

1. ALL LOCATIONS ARE APPROXIMATE AND BASED ON FIELD MEASUREMENTS.
2. ASSESSOR PARCEL DATA SOURCE: NYC DEPARTMENT OF CITY PLANNING.
3. AERIAL IMAGERY SOURCE: NEARMAP, 27 FEBRUARY 2022
4. MICROGRAMS PER CUBIC METER (μg/m3)
5. NYSDOH AGV: NEW YORK DOH AIR GUIDANCE VALUES CONCENTRATIONS CRITERIA PER GUIDANCE FOR EVALUATING SOIL VAPOR INTRUSION, OCTOBER 2006, AND UPDATED MAY 2017.
6. EXCEEDANCES OF NYSDOH AGVS ARE SHADED YELLOW

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SCALE IN FEET

HALEY ALDRICH

REMEDIAL INVESTIGATION WORK PLAN
558 SACKETT STREET
BROOKLYN, NEW YORK

MAP OF SOIL VAPOR CHEMISTRY

AUGUST 2022

FIGURE

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APPENDIX A

Previous Reports (Included as sharefile link)

https://haleyaldrich.sharefile.com/d-s4d2c0bedb02541459db0ec1fc6e15d6f

APPENDIX B
Field Sampling Plan

www.haleyaldrich.com

FIELD SAMPLING PLAN
558 SACKETT STREET
BROOKLYN, NEW YORK

by
Haley & Aldrich of New York
New York, New York

for
Sackett Heights LLC
Brooklyn, New York

File No. 0206384
September 2022

Table of Contents

Table of Contents

1. Introduction

This Field Sampling Plan (FSP) has been prepared as a component of the Remedial Investigation Work Plan (RIWP) for the subject Site located at 558 Sackett Street, Brooklyn, New York. This document was prepared to establish field procedures for field data collection to be performed in support of the RIWP for the Site.

The RIWP includes this Field Sampling Plan, a Quality Assurance Project Plan (QAPP), Health and Safety Plan (HASP), and Community Air Monitoring Plan (CAMP), which are included as part of this plan by reference.

The standard operating procedures (SOP) included as components of this plan will provide the procedures necessary to meet the project objectives. The SOPs will be used as reference for the methods to be employed for field sample collection and handling and the management of field data collected in the execution of the approved RIWP. The SOPs include numerous methods to execute the tasks of the RIWP. The Project Manager will select the appropriate method as required by field conditions and/or the objective the respective project task at the time of sample collection. Field procedures will be conducted in general accordance with the New York State Department of Conservation (NYSDEC) Technical Guidance for Site Investigation and Remediation (DER-10) and the Sampling, Analysis and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC Part 375 Remedial Program when applicable.

2. Field Program

This FSP provides the general purpose of sampling as well as procedural information. The RIWP contains the details on sampling and analysis (locations, depths, frequency, analyte lists, etc.).

The field program has been designed to acquire the necessary data to comply with the RIWP, and includes the following tasks:

- Soil sampling;
- Groundwater sampling;
- Soil vapor sampling;
- Sampling of investigation of derived wastes (IDW) as needed for disposal.

A Limited Phase II Environmental Site Assessment (ESA) was performed at the Site in May 2022 by Brussee Environmental. This Limited Phase II ESA identified the presence of metals and SVOCs, specifically polycyclic aromatic hydrocarbons (PAHs), in soil and the presence of petroleum related VOCs in groundwater. In addition, the previous investigations detected petroleum related VOCs and chlorinated volatile organic compounds (CVOCs) in soil vapor at the Site, indicating the need for additional investigation and sampling on order to comprehensively understand the extent of contamination on the Site.

Previous investigations did not comprehensively delineate the extent of soil, groundwater, and soil vapor contamination at the Site. A RI will be performed upon acceptance of the Site into the BCP and approval of the RIWP that will include additional targeted soil, groundwater, and soil vapor sampling. Results of the additional sample analyses will be used to confirm the results of the previous Site characterization activities, potentially identify an on-site source, and determine a course for remedial action.

These SOPs presented herein may be changed as required, dependent on-site conditions, or equipment limitations, at the time of sample collection. If the procedures employed differ from the SOP, the deviations will be documented in the associated sampling report.

3. Utility Clearance

Invasive remedial activities such as excavation or remedial construction activities require location of underground utilities prior to initiating work. Such clearance is sound practice in that it minimizes the potential for damage to underground facilities and more importantly, is protective of the health and safety of personnel. Under no circumstances will invasive activities be allowed to proceed without obtaining proper utility clearance by the appropriate public agencies and/or private entities. This clearance requirement applies to all work on both public and private property, whether located in a dense urban area or a seemingly out-of-the-way rural location.

The drilling contractor performing the work will be responsible for obtaining utility clearance.

Utility clearance is required by law, and obtaining clearance includes contacting a public or private central clearance agency via a “one-call” telephone service and providing the proposed exploration location information. It is important to note that public utility agencies may not, and usually do not have information regarding utility locations on private property.

Before beginning subsurface work at any proposed exploration locations, it is critical that all readily-available information on underground utilities and structures be obtained. This includes publicly available information as well as information in the possession of private landowners. Any drawings obtained must be reviewed in detail for information pertaining to underground utilities.

Using the information obtained, the site should be viewed in detail for physical evidence of buried lines or structures, including pavement cuts and patches, variation in or lack of vegetation, variations in grading, etc. Care must also be taken to avoid overhead utilities as well. Presence of surface elements of buried utilities should be documented, such as manholes, gas or water service valves, catch basins, monuments or other evidence.

Overhead utility lines must be considered when choosing exploration and excavation locations. Most states require a minimum of 10 ft of clearance between equipment and energized wires. Such separation requirements may also be voltage-based and may vary depending on state or municipality regulations. In evaluating clearance from overhead lines, the same restrictions may apply to “drops”, or wires on a utility pole connecting overhead and underground lines.

Using the information obtained and observations made, proposed exploration or construction locations should be marked in the field. Marking locations can be accomplished using spray paint on the ground, stakes, or other means. All markings of proposed locations should be made in white, in accordance with the generally-accepted universal color code for facilities identification (AWMA 4/99):

- White: Proposed Excavation or Drilling location
- Pink: Temporary Survey Markings
- Red: Electrical Power Lines, Cables, Conduit and Lighting Cables
- Yellow: Gas, Oil, Steam, Petroleum or Gaseous Materials
- Orange: Communication, Alarm or Signal Lines, Cables or Conduits
- Blue: Potable Water
- Purple: Reclaimed Water, Irrigation and Slurry Lines
- Green: Sewers and Drain Lines

In order to effectively evaluate the proposed locations with these entities, detailed, accurate measurements between the proposed locations and existing surface features should be obtained. Such features can be buildings, street intersections, utility poles, guardrails, etc.

Obtaining the utility clearance generally involves the designated “One-Call” underground facilities protection organization for the area and the landowner and one or both following entities:

- A third-party utility locator company will be utilized to locate underground utilities outside of the public right-of-way; and/or
- “Soft dig” excavation techniques to confirm or deny the presence of underground utilities in the area.

The proposed locations should be evaluated in light of information available for existing underground facilities. The detailed measurement information described above will be required by the “one call” agency. The owners of the applicable, participating underground utilities are obligated to mark their respective facilities at the site in the colors described above. Utility stake-out activities will typically not commence for approximately 72 hours after the initial request is made.

The public and private utility entities generally only mark the locations of their respective underground facilities within public rights-of-way. Determination of the locations of these facilities on private property will be the responsibility of the property owner or Contractor. If available information does not contain sufficient detail to locate underground facilities with a reasonable amount of confidence, alternate measures may be appropriate, as described below. In some cases, the memory of a long-time employee of a facility on private property may be the best or only source of information. It is incumbent on the Consultant or Contractor to exercise caution and use good judgement when faced with uncertainty.

Note: It is important to note that not all utilities are participants in the “one-call” agency or process. As such, inquiries must be made with the “one-call” agency to determine which entities do not participate, so they can be contacted independently.

Most utility stakeouts have a limited time period for which they remain valid, typically two to three weeks. It is critical that this time period be considered to prevent expiration of clearance prior to completion of the invasive activities, and the need to repeat the stake-out process.

Care must be exercised to document receipt of notice from the involved agencies of the presence or absence of utilities in the vicinity of the proposed locations.

Most agencies will generally provide a telephone or fax communication indicating the lack of facilities in the project area. If contact is not made by all of the agencies identified by the “one-call” process, do not assume that such utilities are not present. Re-contact the “one-call” agency to determine the status.

For complicated sites with multiple proposed locations and multiple utilities, it is advisable to arrange an on-site meeting with utility representatives. This will minimize the potential for miscommunication amongst the involved parties.

Completion of the utility stake out process is not a guarantee that underground facilities will not be encountered in excavations or boreholes; in fact, most “one-call” agencies and individual utilities do not offer guarantees, nor do they accept liability for damage that might occur. In areas outside the public right-of-way, a utility locating service may be utilized to locate underground utilities. It is advisable that any invasive activities proceed with extreme caution in the upper four to five feet in the event the clearance has failed to identify an existing facility. This may necessitate hand-excavation or probing to confirm potential presence of shallow utilities. If uncertainty exists for any given utility, extra activities can be initiated to solve utility clearance concerns. These options include:

- Screening the proposed work areas with utility locating devices, and/or hiring a utility locating service to perform this task.
- Hand digging, augering or probing to expose or reveal shallow utilities and confirm presence and location. In northern climates, this may require advancing to below frost line, typically at least four feet.
- Using “soft dig” techniques that utilize specialized tools and compressed air to excavate soils and locate utilities. This technique is effective in locating utilities to a depth of four to five feet.

Equipment/Materials:

- White Spray paint
- Wooden stakes, painted white or containing white flagging
- Color-code key
- Available drawings

4. Field Data Recording

This procedure describes protocol for documenting the investigation activities in the field. Field data serves as the cornerstone for an environmental project, not only for site characterization but for additional phases of investigation or remedial design. Producing defensible data includes proper and appropriate recording of field data as it is obtained in a manner to preserve the information for future use. This procedure provides guidelines for accurate, thorough collection and preservation of written and electronic field data.

Field data to be recorded during the project generally includes, but is not limited to, the following:

- general field observations;
- numeric field measurements and instrument readings;
- quantity estimates;
- sample locations and corresponding sample numbers;
- relevant comments and details pertaining to the samples collected;
- documentation of activities, procedures and progress achieved;
- contractor pay item quantities;
- weather conditions;
- a listing of personnel involved in site-related activities;
- a log of conversations, site meetings and other communications; and,
- field decisions and pertinent information associated with the decisions.

4.1 WRITTEN FIELD DATA

Written field data will be collected using a standardized, pre-printed field log form. In general, use of a field log form is preferable as it prompts field personnel to make appropriate observations and record data in a standardized format. This promotes completeness and consistency from one person to the next. Otherwise, electronic data collection using a handheld device produces equal completeness and consistency using a preformatted log form.

In the absence of an appropriate pre-printed form, the data should be recorded in an organized and structured manner in a dedicated project field log book. Log books must be hard cover, bound so that pages cannot be added or removed, and should be made from high-grade 50% rag paper with a water-resistant surface.

The following are guidelines for use of field log forms and log books:

1. Information must be factual and complete.
2. All entries will be made in black indelible ink with a ballpoint pen and will be written legibly. Do not use “rollerball” or felt tip-style pens, since the water-soluble ink can run or smear in the presence of moisture.
3. Field log forms should be consecutively numbered.
4. Each day’s work must start a new form/page.
5. At the end of each day, the current log book page or forms must be signed and dated by the field personnel making the entries.

6. Make data entries immediately upon obtaining the data. Do not make temporary notes in other locations for later transfer; this only increases the potential for error or loss of data.
7. Entry errors are to be crossed out with a single line and initialed by the person making the correction.
8. Do not leave blanks on log forms, if no entry is applicable for a given data field, indicate so with “NA” or a dash (“--“).
9. At the earliest practical time, photocopies or typed versions of log forms and log book pages should be made and placed in the project file as a backup in the event the book or forms are lost or damaged.
10. Log books should be dedicated to one project only, i.e., do not record data from multiple projects in one log book.

4.2 ELECTRONIC DATA

Electronic data recording involves electronic measurement of field information through the use of monitoring instruments, sensors, gauges, and equipment controls. The following is a list of guidelines for proper recording and management of electronic field data:

1. Field data management should follow requirements of a project-specific data management plan (DMP), if applicable.
2. Use only instruments that have been calibrated in accordance with manufacturer’s recommendations.
3. Usage of instruments, controls and computers for the purpose of obtaining field data should only be performed by personnel properly trained and experienced in the use of the equipment and software.
4. Use only fully-licensed software on personal computers and laptops.
5. Loss of electronic files may mean loss of irreplaceable data. Every effort should be made to back up electronic files obtained in the field as soon as practical. A backup file placed on the file server will minimize the potential for loss.
6. Electronic files, once transferred from field instruments or laptops to office computers, should be protected if possible, to prevent unwanted or inadvertent manipulation or modification of data. Several levels of protection are usually available for spreadsheets, including making a file “read-only” or assigning a password to access the file.
7. Protect CD disks from exposure to moisture, excessive heat or cold, magnetic fields, or other potentially damaging conditions.
8. Remote monitoring is often used to obtain stored electronic data from site environmental systems. A thorough discussion of this type of electronic field data recording is beyond the scope of this Section. Such on-site systems are generally capable of storing a limited amount of data as a comma-delimited or spreadsheet file. Users must remotely access the monitoring equipment files via modem or other access and download the data. In order to minimize the potential for loss of data, access and downloading of data should be performed frequently enough to ensure the data storage capacity of the remote equipment is not exceeded.

Equipment/Materials:

- Appropriate field log forms, or iPad® or equivalent with preformatted log forms.
- Indelible ball point pen (do not use “rollerball” or felt-tip style pens);
- Straight edge;
- Pocket calculator; and,
- Laptop computer (if required).

5. Aquifer Characterization

This procedure describes measurement of water levels in groundwater monitoring.

A synoptic gauging round will be completed to obtain water levels in monitoring wells. Water levels will be acquired in a manner that provides accurate data that can be used to calculate vertical and horizontal hydraulic gradients and other hydrogeologic parameters. Accuracy in obtaining the measurements is critical to ensure the usability of the data.

5.1 PROCEDURE

In order to provide reliable data, water level monitoring events should be collected over as short a period of time as practical. Barometric pressure can affect groundwater levels and, therefore, observation of significant weather changes during the period of water level measurements must be noted. Rainfall events and groundwater pumping can also affect groundwater level measurements. Personnel collecting water level data must note if any of these controls are in effect during the groundwater level collection period. Due to possible changes during the groundwater level collection period, it is imperative that the time of data collection at each station be accurately recorded. Water levels will also be collected prior to any sample collection that day.

The depth to groundwater will be measured with an electronic depth-indicating probe. Prior to obtaining a measurement, a fixed reference point on the well casing will be established for each well to be measured. Unless otherwise established, the reference point is typically established and marked on the north side of the well casing. Do not use protective casings or flush-mounted road boxes as a reference, due to the potential for damage or settlement. The elevation of the reference point shall be obtained by accepted surveying methods, to the nearest 0.01 ft.

The water level probe will be lowered into the well until the meter indicates (via indicator light or tone) the water is reached. The probe will be raised above water level and slowly lowered again until water is indicated. The cable will be held against the side of the inner protective casing at the point designated for water level measurements and a depth reading taken. This procedure will be followed three times or until a consistent value is obtained. The value will be recorded to the nearest 0.01 feet on the Groundwater Level Monitoring Report form.

Upon completion, the probe will be raised to the surface and together with the amount of cable that entered the well casing, will be decontaminated in accordance with methods described in Equipment Decontamination Procedure.

Equipment/Materials:

- Battery-operated, non-stretch electronic water level probe with permanent markings at 0.01 ft. increments, such as the Solinst Model 101 or equivalent.
- The calibrated cable on the depth indicator will be checked against a surveyor's steel tape once per quarter year. A new cable will be installed if the cable has changed by more than 0.01% (0.01 feet for a 100-foot cable). See also the Field Instruments – Use and Calibration Procedure.
- Groundwater Level Monitoring Report form.

6. Sample Collection for Laboratory Analysis

6.1 SOIL SAMPLE COLLECTION FOR LABORATORY ANALYSIS

The following procedure is an introduction to soil sampling techniques and an outline of field staff responsibilities. All samples will be collected with dedicated sampling equipment.

6.1.1 Preparatory Requirements

Prior to the beginning of any remedial investigation or remedial measures activities, staff must attend a project briefing for the purpose of reviewing the project work plan, site and utility plans, drawings, applicable regulations, sampling location, depth, and criteria, site contacts, and other related documents. Health and safety concerns will be documented in a site-specific Health & Safety Plan.

A file folder for the field activities should be created and maintained such that all relevant documents and log forms likely to be useful for the completion of field activities by others are readily available in the event of personnel changes.

6.1.2 Soil Classification

The stratigraphic log is a factual description of the soil at the borehole location and is relied upon to interpret the soil characteristics, and their influence and significance in the subsurface environment. The accuracy of the stratigraphic log is to be verified by the person responsible for interpreting subsurface conditions. An accurate description of the soil stratigraphy is essential for a reasonable understanding of the subsurface conditions. Confirmation of the field description by examination of representative soil samples by the project geologist, hydrogeologist, or geotechnical engineer (whenever practicable) is recommended.

The ability to describe and classify soil correctly is a skill that is learned from a person with experience and by systematic training and comparison of laboratory results to field descriptions.

6.1.2.1 Data Recording

Several methods for classifying and describing soils or unconsolidated sediments are in relatively widespread use. The Unified Soil Classification System (USCS) is the most common. With the USCS, a soil is first classified according to whether it is predominantly coarse-grained or fine-grained.

The description of fill soil is similar to that of natural undisturbed soil except that it is identified as fill and not classified by USCS group, relative density, or consistency. Those logging soils must attempt to distinguish between soils that have been placed (i.e., fill) and not naturally present; or soils that have been naturally present but disturbed (i.e., disturbed native).

It is necessary to identify and group soil samples consistently to determine the subsurface pattern or changes and non-conformities in soil stratigraphy in the field at the time of drilling. The stratigraphy in each borehole during drilling is to be compared to the stratigraphy found at the previously completed boreholes to ensure that pattern or changes in soil stratigraphy are noted and that consistent terminology is used.

Visual examination, physical observations and manual tests (adapted from ASTM D2488, visual-manual procedures) are used to classify and group soil samples in the field and are summarized in this subsection. ASTM D2488 should be reviewed for detailed explanations of the procedures. Visual-manual procedures used for soil identification and classification include:

- visual determination of grain size, soil gradation, and percentage fines;
- dry strength, dilatancy, toughness, and plasticity (thread or ribbon test) tests for identification of inorganic fine-grained soil (e.g., CL, CH, ML, or MH); and
- soil compressive strength and consistency estimates based on thumb indent and pocket penetrometer (preferred) methods.

Soil characteristics like plasticity, strength and dilatancy should be determined using the Haley & Aldrich Soil Identification Field Form.

6.1.2.2 Field Sample Screening

Upon the collection of soil samples, the soil is screened with a photoionization detector (PID) for the presence of organic vapor. This is accomplished by running the PID across the soil sample. The highest reading and sustained readings are recorded.

Note: The PID measurement must be done upwind of the excavating equipment or any running engines so that exhaust fumes will not affect the measurements.

Another method of field screening is head space measurements. This consists of placing a portion of the soil sample in a sealable glass jar, placing aluminum foil over the jar top, and tightening the lid. Alternatively, plastic sealable bags may be utilized for field screen in lieu of glass containers. The jar should only be partially filled. Shake the jar and set aside for at least 30 minutes. After the sample has equilibrated, the lid of the jar can be opened; the foil is punctured with the PID probe and the air (headspace) above the soil sample is monitored. This headspace reading on the field form or in the field book is recorded. All head space measurements must be completed under similar conditions to allow comparability of results. Soil classification and PID readings will be recorded in the daily field report.

Equipment/Materials:

- Pocket knife or small spatula
- Small handheld lens
- Stratigraphic Log (Overburden) (Form 2001)
- Tape Measure
- When sampling for PFAS, acceptable materials for sampling include stainless steel, high density polyethylene (HDPE), PVC, silicone, acetate, and polypropylene.

6.1.3 Soil Sampling

Soil samples will be collected from acetate liners installed by a track-mounted direct push drill rig (Geoprobe®) operated by a licensed operator. Soil samples will be collected using a stainless-steel trowel or sampling spoon into laboratory provided sample containers. If it is necessary to relocate any proposed sampling location due to terrain, utilities, access, etc., the Project Manager must be notified, and an alternate location will be selected.

Prior to use and between each sampling location at an environmental site, the sampling equipment must be decontaminated. All decontamination must be conducted in accordance with the project specific plans or the methods presented in SOP 7.0.

6.1.4 Sampling Techniques

The following procedure describes typical soil sample collection methods for submission of samples to a laboratory for chemical analysis. The primary goal of soil sampling is to collect representative samples for examination and chemical analysis (if required).

Environmental soil samples obtained for chemical analyses are collected with special attention given to the rationale behind determining the precise zone to sample, the specifics of the method of soil extraction and the requisite decontamination procedures. Preservation, handling and glassware for environmental soil samples varies considerably depending upon several factors including the analytical method to be conducted, and the analytical laboratory being used.

6.1.4.1 Grab Versus Composite Samples

A grab sample is collected to identify and quantify conditions at a specific location or interval. The sample is comprised of the minimum amount of soil necessary to make up the volume of sample dictated by the required sample analyses. Composite samples may be obtained from several locations or along a linear trend (in a test pit or excavation). Sampling may occur within or across stratification.

6.2 GROUNDWATER SAMPLE COLLECTION FOR LABORATORY ANALYSIS

The following section describes two techniques for groundwater sampling: "Low Stress/Low Flow Methods" and "Typical Sampling Methods."

"Low Stress/Low Flow" methods will be employed when collecting groundwater samples for the evaluation of volatile constituents (i.e., dissolved oxygen (DO)) or in fine-grained formations where sediment/colloid transport is possible. Analyses typically sensitive to colloidal transport issues include polychlorinated biphenyls (PCBs), polyaromatic hydrocarbons (PAHs) and metals.

The "Typical Sampling Methods" will be employed where the collection of parameters less sensitive to turbidity/sediment issues are being collected (general chemistry, pesticides and other semi-volatile organic compounds (SVOCs)).

NOTE: If non-aqueous phase liquids (NAPL) (light or dense) are detected in a monitoring well, groundwater sample collection will not be conducted, and the Project Manager must be contacted to determine a course of action.

6.2.1 Preparatory Requirements

- Verify well identification and location using borehole log details and location layout figures. Note the condition of the well and record any necessary repair work required.

- Prior to opening the well cap, measure the breathing space above the well casing with a handheld organic vapor analyzer to establish baseline breathing space VOC levels. Repeat this measurement once the well cap is opened. If either of these measurements exceeds the air quality criteria in the HASP, field personnel should adjust their PPE accordingly.

- Prior to commencing the groundwater purging/sampling, a water level must be obtained to determine the well volume for hydraulic purposes. In some settings, it may be necessary to allow the water level time to equilibrate. This condition exists if a watertight seal exists at the well cap and the water level has fluctuated above the top of screen; creating a vacuum or pressurized area in this air space. Three water level checks will verify static water level conditions have been achieved.

- Calculate the volume of water in the well. Typically overburden well volumes consider only the quantity of water standing in the well screen and riser; bedrock well volumes are calculated on the quantity of water within the open core hole and within the overburden casing.

6.2.2 Well Development

Well development is completed to remove fine grained materials from the well but in such a manner as to not introduce fines from the formation into the sand pack. Well development continues until the well responds to water level changes in the formation (i.e., a good hydraulic connection is established between the well and formation) and the well produces clear, sediment-free water to the extent practical.

- Attach appropriate pump and lower tubing into well.
- Gauge well and calculate one well volume. Turn on pump. If well runs dry, shut off pump and allow to recover.
- Surging will be performed by raising and lowering the pump several times to pull fine-grained material from the well. Periodically measure turbidity level using a La Motte turbidity reader.
- The second and third steps will be repeated until turbidity is less than 50 nephelometric turbidity units (NTU) or when 10 well volumes have been removed.
- All water generated during cleaning and development procedures will be collected and contained on site in 55-gallon drums for future analysis and appropriate disposal.

Equipment:

- Appropriate health and safety equipment
- Knife
- Power source (generator)
- Field book
- Well Development Form (Form 3006)
- Well keys
- Graduated pails

- Pump and tubing
- Cleaning supplies (including non-phosphate soap, buckets, brushes, laboratory-supplied distilled/deionized water, tap water, cleaning solvent, aluminum foil, plastic sheeting, etc.)
  Water level meter

6.2.3 Well Purging and Stabilization Monitoring (Low Stress/Low Flow Method)

The preferred method for groundwater sampling will be the low stress/low flow method described below.

- Slowly lower the pump, safety cable, tubing and electrical lines into the well to the depth specified by the project requirements. The pump intake must be at the midpoint of the well screen to prevent disturbance and resuspension of any sediment in the screen base.

- Before starting the pump, measure the water level again with the pump in the well leaving the water level measuring device in the well when completed.

- Purge the well at 100 to a maximum of 500 milliliters per minute (mL/min). During purging, the water level should be monitored approximately every 5 minutes, or as appropriate. A steady flow rate should be maintained that results in drawdown of 0.3 feet or less. The rate of pumping should not exceed the natural flow rate conditions of the well. Care should be taken to maintain pump suction and to avoid entrainment of air in the tubing. Record adjustments made to the pumping rates and water levels immediately after each adjustment.

- During the purging of the well, monitor and record the field indicator parameters (pH, temperature, conductivity, oxidation-reduction (redox) reaction potential (ORP), dissolved oxygen (DO), and turbidity) approximately every five minutes. Stabilization is considered to be achieved when the final groundwater flow rate is achieved, and three consecutive readings for each parameter are within the following limits:

  - pH: 0.1 pH units of the average value of the three readings;
  - Temperature: 3 percent of the average value of the three readings;
  - Conductivity: 0.005 milliSiemen per centimeter (mS/cm) of the average value of the three readings for conductivity <1 mS/cm and 0.01 mS/cm of the average value of the three readings for conductivity >1 mS/cm;
  - ORP: 10 millivolts (mV) of the average value of the three readings;
  - DO: 10 percent of the average value of the three readings; and
  - Turbidity: 10 percent of the average value of the three readings, or a final value of less than 50 nephelometric turbidity units (NTU).

- The pump must not be removed from the well between purging and sampling.

6.2.4 Sampling Techniques

- If an alternate pump is utilized, the first pump discharge volumes should be discarded to allow the equipment a period of acclimation to the groundwater.

- Samples are collected directly from the pump with the groundwater being discharged directly into the appropriate sample container. Avoid handling the interior of the bottle or bottle cap and don new gloves for each well sampled to avoid contamination of the sample.

- Order of sample collection:

  - Polyfluoroalkyl substances (PFAS)
  - Volatile organic compounds (VOC)
  - 1,4-Dioxane
  - Semi-volatile organic compounds (SVOC)
  - Total Analyte List (TAL) metals

- 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.

- For low stress/low flow sampling, samples should be collected at a flow rate between 100 and 500 mL/min and such that drawdown of the water level within the well does not exceed the maximum allowable drawdown of 0.3 feet.

- The pumping rate used to collect a sample for VOC should not exceed 100 mL/min. Samples should be transferred directly to the final container 40 mL glass vials completely full and topped with a Teflon cap. Once capped the vial must be inverted and tapped to check for headspace/air presence (bubbles). If air is present, the sample will be discarded, and recollected until free of air.

- All samples must be labeled with:

  - A unique sample number
  - Date and time
  - Parameters to be analyzed
  - Project Reference ID
  - Sampler's initials

- Labels should be written in indelible ink and secured to the bottle with clear tape.

Equipment/Materials:

- pH meter, conductivity meter, DO meter, ORP meter, nephelometer, temperature gauge
- Field filtration units (if required)
- Purging/sampling equipment
  - Peristaltic Pump
- Water level probe

- Sampling materials (containers, log book/forms, coolers, chain of custody)
- Work Plan
- Health and Safety Plan
- When sampling for PFAS, acceptable materials for sampling include stainless steel, HDPE, PVC, silicone, acetate, and polypropylene.

Note: Peristaltic pump use for VOC collection is not acceptable on NYSDEC/EPA/RCRA sites; this technique has gained acceptance in select areas where it is permissible to collect VOCs using a peristaltic pump at a low flow rate (e.g., Michigan).

Note: 1,4-Dioxane and PFAS purge and sample techniques will be conducted following the NYSDEC guidance documents (see Appendix C of the RIWP). Acceptable groundwater pumps include stainless steel inertia pump with HDPE tubing, peristaltic pump equipped with HDPE tubing and silicone tubing, stainless steel bailer with stainless steel ball or bladder pump (identified as PFAS-free) with HDPE tubing.

Field Notes:

- Field notes must document all the events, equipment used, and measurements collected during the sampling activities. Section 2.0 describes the data/recording procedure for field activities.
- The log book should document the following for each well sampled:
  - Identification of well
  - Well depth
  - Static water level depth and measurement technique
  - Sounded well depth
  - Presence of immiscible layers and detection/collection method
  - Well yield – high or low
  - Purge volume and pumping rate
  - Time well purged
  - Measured field parameters
  - Purge/sampling device used
  - Well sampling sequence
  - Sampling appearance
  - Sample odors
  - Sample volume
  - Types of sample containers and sample identification
  - Preservative(s) used
  - Parameters requested for analysis
  - Field analysis data and method(s)
  - Sample distribution and transporter
  - Laboratory shipped to
  - Chain of custody number for shipment to laboratory
  - Field observations on sampling event
  - Name collector(s)
  - Climatic conditions including air temperature
  - Problems encountered and any deviations made from the established sampling protocol.

A standard log form for documentation and reporting groundwater purging and sampling events are presented on the Groundwater Sampling Record, Low Flow Groundwater Sampling Form, and Low Flow Monitored Natural Attenuation (MNA) Field Sampling Form. Refer to Appendix A for example field forms.

Groundwater/Decon Fluid Disposal:

- Groundwater disposal methods will vary on a case-by-case basis but may range from:
  - Off-site treatment at private treatment/disposal facilities or public owned treatment facilities
  - On-site treatment at Facility operated facilities
  - Direct discharge to the surrounding ground surface, allowing groundwater infiltration to the underlying subsurface regime
- Decontamination fluids should be segregated and collected separately from wash waters/groundwater containers.

6.3 SUB-SLAB/SOIL VAPOR SAMPLING

The following procedure is an introduction to soil vapor sampling techniques and an outline of field staff responsibilities.

6.3.1 Preparatory Requirements

Prior to collecting the field sample, ensure the stainless-steel oil vapor probe has been installed to the desired depth and sealed completely to the surface using a material such as bentonite. As part of the vapor intrusion evaluation, a tracer gas should be used in accordance with NYSDOH protocols to serve as a quality assurance/quality control (QA/QC) device to verify the integrity of the soil vapor probe seal. A container (box, plastic pail, etc.) will serve to keep the tracer gas in contact with the probe during testing. A portable monitoring device will be used to analyze a sample of soil vapor for the tracer gas prior to sampling. If the tracer sample results show a significant presence of the tracer, the probe seals will be adjusted to prevent infiltration. At the conclusion of the sampling round, tracer monitoring should be performed a second time to confirm the integrity of the probe seals.

6.3.2 Sampling Techniques

Samples will be collected in appropriately sized Summa canisters that have been certified clean by the laboratory and samples will be analyzed by using USEPA Method TO-15. Flow rate for both purging and sampling will not exceed 0.2 L/min. One to three implant volumes shall be purged prior to the collection of any soil-gas samples. A sample log sheet will be maintained summarizing sample identification, date and time of sample collection, sampling depth, identity of samplers, sampling methods and devices, soil vapor purge volumes, volume of the soil vapor extracted, vacuum of canisters before and after the samples are collected, apparent moisture content of the sampling zone, and chain of custody protocols.

6.4 SAMPLE HANDLING AND SHIPPING

Sample management is the continuous care given to each sample from the point of collection to receipt at the analytical laboratory. Good sample management ensures that samples are properly recorded, properly labeled, and not lost, broken, or exposed to conditions which may affect the sample's integrity.

All sample submissions must be accompanied with a chain of custody (COC) document to record sample collection and submission. Personnel performing sampling tasks must check the sample preparation and preservation requirements to ensure compliance with the Quality Assurance Project Plan.

The following sections provide the minimum standards for sample management.

6.4.1 Sample Handling

Prior to entering the field area where sampling is to be conducted, especially at sites with defined exclusion zones, the sampler should ensure that all materials necessary to complete the sampling are on hand. If samples must be maintained at a specified temperature after collection, dedicated coolers and ice must be available for use. Conversely, when sampling in cold weather, proper protection of water samples, trip blanks, and field blanks must be considered. Sample preservation will involve pH adjustment, cooling to 4°C, and sample filtration and preservation.

6.4.2 Sample Labeling

Samples must be properly labeled immediately upon collection.

Note that the data shown on the sample label is the minimum data required. The sample label data requirements are listed below for clarity.

- Project name
- Sample name/number/unique identifier
- Sampler's initials
- Date of sample collection
- Time of sample collection
- Analysis required
- Preservatives

To ensure that samples are not confused, a clear notation should be made on the container with a permanent marker. If the containers are too soiled for marking, the container can be put into a "zip lock" bag which can then be labeled.

All sample names will be as follows:

- Sample unique identifier: Enter the sample name or number. There should be NO slashes, spaces or periods in the date.
- Date: Enter the six-digit date when the sample was collected. Note that for one-digit days, months, and/or years, add zeros so that the format is MMDDYY (050210). There should be NO slashes, dashes, or periods in the date.

The QA/QC samples will be numbered consecutively as collected with a sample name, date and number of samples collected throughout the day (i.e., when multiple QA/QC samples are collected in one day).

Examples of this naming convention are as follows:

Sample Name:	Comments
TB-050202-0001	TRIP BLANK
TB-050202-0002	TRIP BLANK
FD-050202-0001	FIELD DUPLICATE
FD-050202-0002	FIELD DUPLICATE

NOTE: The QA/QC Sample # resets to 0001 EACH DAY, this will avoid having to look back to the previous day for the correct sequential number.

6.4.3 Field Code

The field code will be written in the 'Comments' field on the chain of custody for EVERY sample but will not be a part of the actual sample name. Enter the one/two-character code for type of sample (must be in CAPITALS):

N	Normal Field Sample
FD	Field Duplicate (note sample number (i.e., 0001) substituted for time)
TB	Trip Blank (note sample number (i.e., 0001) substituted for time)
EB	Equipment Blank (note sample number (i.e., 0001) substituted for time)
FB	Field Blank (note sample number (i.e., 0001) substituted for time)
KD	Known Duplicate
FS	Field Spike Sample
MS	Matrix Spike Sample (note on ‘Comments’ field of COC – laboratory to spike matrix.
MD	Matrix Spike Duplicate Sample (note on ‘Comments’ field of COC – laboratory to spike matrix.
RM	Reference Material

The sample labeling – both chain and sample bottles must be EXACTLY as detailed above. In addition, the Field Sample Key for each sample collected must be filled out.

6.4.4 Packaging

Sample container preparation and packing for shipment should be completed in a well-organized and clean area, free of any potential cross contamination. The following is a list of standard guidelines which must be followed when packing samples for shipment.

- Double bag ice in "Zip Lock" bags.
- Double check to ensure trip and temperature blanks have been included for all shipments containing VOCs, or where otherwise specified in the QAPP.
- Enclose the Chain of Custody form in a "Zip Lock" bag.
- Ensure custody seals (two, minimum) are placed on each cooler. Coolers with hinged lids should have both seals placed on the opening edge of the lid. Coolers with "free" lids should have seals placed on opposite diagonal corners of the lid. Place clear tape over custody seals.

- Containers should be wiped clean of all debris/water using paper towels (paper towels must be disposed of with other contaminated materials).
- Clear, wide packing tape should be placed over the sample label for protection.
- Do not bulk pack. Each sample must be individually padded.
- Large glass containers (1 liter and up) require much more space between containers.
- Ice is not a packing material due to the reduction in volume when it melts.

Note: Never store sterile sample containers in enclosures containing equipment which use any form of fuel or volatile petroleum-based product. When conducting sampling in freezing conditions at sites without a heated storage area (free of potential cross contaminants), unused trip blanks should be isolated from coolers immediately after receipt. Trip blanks should be double bagged and kept from freezing.

6.4.5 Chain-of-Custody Records

Chain of custody (COC) forms will be completed for all samples collected. The form documents the transfer of sample containers. The COC record, completed at the time of sampling, will contain, but not be limited to, the sample number, date and time of sampling, and the name of the sampler. The COC document will be signed and dated by the sampler when transferring the samples.

Each sample cooler being shipped to the laboratory will contain a COC form. The cooler will be sealed properly for shipment. The laboratory will maintain a copy for their records. One copy will be returned with the data deliverables package.

The following list provides guidance for the completion and handling of all COCs:

- COCs used should be a Haley & Aldrich standard form or supplied by the analytical laboratory.
- COCs must be completed in black ball point ink only.
- COCs must be completed neatly using printed text.
- If a simple mistake is made, cross out the error with a single line and initial and date the correction.
- Each separate sample entry must be sequentially numbered.
- If numerous repetitive entries must be made in the same column, place a continuous vertical arrow between the first entry and the next different entry.
- When more than one COC form is used for a single shipment, each form must be consecutively numbered using the "Page ___ of ___" format.
- If necessary, place additional instructions directly onto the COC in the Comment Section. Do not enclose separate instructions.
- Include a contact name and phone number on the COC in case there is a problem with the shipment.
- Before using an acronym on a COC, clearly define the full interpretation of your designation [i.e., polychlorinated biphenyls (PCBs)].

6.4.6 Shipment

Prior to the start of the field sampling, the carrier should be contacted to determine if pickup will be at the field site location. If pick-up is not available at the Site, the nearest pick-up or drop off location should be determined. Sample shipments must not be left at unsecured drop locations.

Copies of all shipment manifests must be maintained in the field file.

7. Field Instruments – Use and Calibration

A significant number of field activities involve usage of electronic instruments to monitor for environmental conditions and health and safety purposes. It is imperative the instruments are used and maintained properly to optimize their performance and minimize the potential for inaccuracies in the data obtained. This section provides guidance on the usage, maintenance and calibration of electronic field equipment.

- All monitoring equipment will be in proper working order and operated in accordance with manufacturer's recommendations.

- Field personnel will be responsible for ensuring that the equipment is maintained and calibrated in the field in accordance with manufacturer's recommendations.

- Instruments will be operated only by personnel trained in the proper usage and calibration.

- Personnel must be aware of the range of conditions such as temperature and humidity for instrument operation. Usage of instruments in conditions outside these ranges will only proceed with approval of the Project Manager and/or Health and Safety Officer as appropriate.

- Instruments that contain radioactive source material, such as x-ray fluorescence (XRF) analyzers or moisture-density gauges require specific transportation, handling and usage procedures that are generally associated with a license from the Nuclear Regulatory Commission (NRC) or an NRC-Agreement State. Under no circumstance will operation of such instruments be allowed on site unless by properly authorized and trained personnel, using the proper personal dosimetry badges or monitoring instruments.

7.1 GENERAL PROCEDURE DISCUSSION

Care must be taken to minimize the potential for transfer of contaminated materials to the ground or onto other materials. Regardless of the size or nature of the equipment being decontaminated, the process will utilize a series of steps that involve removal of gross material (dirt, grease, oil etc.), washing with a detergent, and multiple rinsing steps. In lieu of a series of washes and rinse steps, steam cleaning with low-volume, high-pressure equipment (i.e., steam cleaner) is acceptable.

Exploration equipment, and all monitoring equipment in contact with the sampling media must be decontaminated prior to initiating site activities, in between exploration locations to minimize cross-contamination, and prior to mobilizing off site after completion of site work.

The following specific decontamination procedure is recommended for sampling equipment and tools:

- Brush loose soil off equipment;
- Wash equipment with laboratory grade detergent (i.e., Alconox or equivalent);
- Rinse with tap water;
- Rinse equipment with distilled water;
- Allow water to evaporate before reusing equipment; and
- Wrap equipment in aluminum foil when not being used.

7.2 DECONTAMINATION OF MONITORING EQUIPMENT

Because monitoring equipment is difficult to decontaminate, care should be exercised to prevent contamination. Sensitive monitoring instruments should be protected when they are at risk of exposure to contaminants. This may include enclosing them in plastic bags allowing an opening for the sample intake. Ventilation ports should not be covered.

If contamination does occur, decontamination of the equipment will be required; however, immersion in decontamination fluids is not possible. As such, care must be taken to wipe the instruments down with detergent-wetted wipes or sponges, and then with de-ionized water-wetted wipes or sponges.

7.3 DISPOSAL OF WASH SOLUTIONS AND CONTAMINATED EQUIPMENT

All contaminated wash water, rinses, solids and materials used in the decontamination process that cannot be effectively decontaminated (such as polyethylene sheeting) will be containerized and disposed of in accordance with applicable regulations. All containers will be labeled with an indelible marker as to contents and date of placement in the container, and any appropriate stickers required (such as PCBs). Storage of decontamination wastes on site will not exceed 90 days under any circumstances.

Equipment/Materials:

Decontamination equipment and solutions are generally selected based on ease of decontamination and disposability.

- Polyethylene sheeting;
- Metal racks to hold equipment;
- Soft-bristle scrub brushes or long-handle brushes for removing gross contamination and scrubbing with wash solutions;
- Large galvanized wash tubs, stock tanks, or wading pools for wash and rinse solutions;
- Plastic buckets or garden sprayers for rinse solutions;
- Large plastic garbage cans or other similar containers lined with plastic bags can be used to store contaminated clothing;
- Contaminated liquids and solids should be segregated and containerized in DOT-approved plastic or metal drums, appropriate for offsite shipping/disposal if necessary.

8. Investigation Derived Waste Disposal

8.1 RATIONALE/ASSUMPTIONS

This procedure applies to the disposition of investigation derived waste (IDW) including soils and/or groundwater. IDW is dealt with the following "Best Management Practices" and is not considered a listed waste due to the lack of generator knowledge concerning chemical source, chemical origin, and timing of chemical introduction to the subsurface.

Consequently, waste sampling and characterization is performed to determine if the wastes exhibit a characteristic of hazardous waste. The disposal of soil cuttings, test pit soils and/or purged groundwater will be reviewed on a case by case basis prior to initiation of field activities. Two scenarios typically exist:

- When no information is available in the area of activity or investigation, and impacted media/soils are identified. Activities such as new construction and /or maintenance below grade may encounter environmental conditions that were unknown.
- Disposal Required/Containerization Required – When sufficient Site information regarding the investigative Site conditions warrant that all materials handled will be contained and disposed.

If a known listed hazardous and/or characteristically hazardous waste/contaminated environmental media is being handled, then handling must be performed in accordance with RCRA Subtitle C (reference 2, Part V, Section 1(a),(b),(c)).

The following outlines the waste characterization procedures to be employed when IDW disposal is required.

The following procedure describes the techniques for characterization of IDW for disposal purposes. IDW may consist of soil cuttings (augering, boring, well installation soils, test pit soils), rock core or rock flour (from coring, reaming operations), groundwater (from well development, purging and sampling activities), decontamination fluids, personal protective equipment (PPE), and disposal equipment (DE).

8.2 PROCEDURE

The procedures for handling and characterization of field activity generated wastes are:

A.) Soil Cuttings - Soils removed from boring activities will be contained within an approved container, suitable for transportation and disposal.

  - Once placed into the approved container, any free - liquids (i.e., groundwater) will be removed for disposal as waste fluids or solidified within the approved container using a solidification agent such as Speedy Dri (or equivalent).
  - Contained soils will be screened for the presence of Volatile Organic Compounds (VOCs), using a Photo ionization detector (PID); this data will be logged for future reference.

- Once screened, full and closed; the container will be labeled and placed into the container storage area. At a minimum, the following information will be shown on each container label: date of filling/generation, Site name, source of soils (i.e., borehole or well), and contact.
- Prior to container closure, representative samples from the containers will be collected for waste characterization purposes and submitted to the project laboratory.
- Typically, at a location where an undetermined site-specific parameter group exists, sampling and analysis may consist of the full RCRA Waste Characterization (ignitability, corrosivity, reactivity, toxicity), or a subset of the above based upon data collected, historical information, and generator knowledge.

B.) Groundwater - purging, and sampling groundwater, which requires disposal, will be contained.

- Containment may be performed in 55-gallon drums, tanks suitable for temporary storage (i.e., Nalgene tanks 500 to 1,000 gallons) or if large volumes of groundwater are anticipated, tanker trailer (5,000 to 10,000 gallons ±), or drilling "Frac" tanks may be utilized (20,000 gallons ±). In all cases the container/tank used for groundwater storage must be clean before use such that cross contamination does not occur.

C.) Decon Waters/Decon Fluids - Decon waters and/or fluids will be segregated, contained, and disposed accordingly.

- Decon waters may be disposed of with the containerized groundwater once analytical results have been acquired.

D.) PPE/DE – A number of disposal options exists for spent PPE/DE generated from investigation tasks. The options typically employed are:

- Immediately disposed of within on-Site dumpster/municipal trash; or
- If known to be contaminated with RCRA hazardous waste, dispose off-Site at a RCRA Subtitle C facility.
- Spent Solvent/Acid Rinses - The need for sampling must be determined in consultation with the waste management organization handling the materials. If known that only the solvent and/or acids are present, then direct disposal/treatment using media specific options may be possible without sampling (i.e., incineration).
- PPE/DE – Typically not sampled and included with the disposal of the solid wastes.

Equipment/Materials:

- Sample spoons, trier, auger,
- Sample mixing bowl,
- Sampling bailer, or pump,
- Sample glassware.

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6. ASTM D4696: Guide for Pore-liquid Sampling from the Vadose Zone
7. ASTM D5979: Guide for Conceptualization and Characterization of Groundwater Systems
8. ASTM D5903: Guide for Planning and Preparing for a Groundwater Sampling Event
9. ASTM D4448: Standard Guide for Sampling Groundwater Wells
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26. USEPA RCRA - Management of Contaminated Media (October 1998).
27. USEPA CERCLA Guidance (Options Relevant to RCRA Facilities): Guide to Management of Investigation - Derived Wastes (January 1992).
28. USEPA: Low-flow (Minimal Drawdown) Groundwater Sampling Procedures (EPA/540/S-95/504)
29. USEPA: RCRA Groundwater Monitoring: Draft Technical guidance (EPA/530 R 93 001)
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APPENDIX A

Field Forms

HALEY ALDRICH

EQUIPMENT CALIBRATION LOG

Project: ____________________

Location: ____________________

Model Name: ____________________

Model Number: ____________________ **Serial Number:** ____________________

Cal. Standards: ____________________

____

____

Instruments will be calibrated in accordance with manufacturer's recommendations at least once per day.

Date	Time	Calibration Satandard Solution	Calibration Result	Calibrated by

Other Comments: ____________________

Groundwater Field Sampling Form

Location:

Job Number: ____________________
Well ID: ____________________
Field Sampling Crew: ____________

Date: ____________________
Start Time: ____________________
Finished Time: ____________________

Initial Depth to Water: ____________________
Well Depth: ____________________
Depth to top of screen: ____________________
Depth to bottom of screen: ____________________
Depth of Pump Intake: ____________________

Purging Device:________________
Tubing present in well? __________
Tubing type: __________________

Time Elapsed (24 hour)	Depth to Water (from casing)	Pump Setting (ml/min or gal/min)	Purge Rate (ml/min or gal/min)	Cumulative Purge Volume (liters or gallons)	Temperature (degrees Celsius)	pH	Conductivity us/cm	Dissolved Oxygen (mg/L)	Turbidity (NTU)	ORP/eH (mv)	Comments

Comments:

HALEY ALDRICH

SAMPLE IDENTIFICATION KEY

Page of

PROJECT ____________________ **H&A FILE NO.** ____________________
LOCATION ____________________ **PROJECT MGR.** ____________________
CLIENT ____________________
CONTRACTOR ____________________

Sample ID	Parent Sample ID	Location ID	Sample Date	Sample Time (military)	Sample Type Code	Filtered (Water Only T/D/N)	Composite Y/N	Soil Type	Depth To Top Of Sample	Depth To Bottom Of Sample	C.O.C. Number	Notes	Collected By

Notes:

Common Sample Type Codes:

N Normal Environmental Samp	WG Groundwater	WS Surface Water	SO Soil	GS Soil Gas	SE Sediment
WQ Water for Quality Control	FD Field Duplicate	EB Equipment Blank	TB Trip Blank	MS Matris Spike	MSD Matrix Spike Duplicate

see Memorandum dated 08/08/05 from Melanie Satanek "Sample Labeling for Submission to Analytical Laboratory" for less common codes

HALEY ALDRICH

DAILY FIELD REPORT

Page **of**

Project

Location

Client

Contractor

Weather

Report No.

Date

Page of

File No.

Temperature

Field Representative(s)	Time on site	Report/Travel/Other	Total hours

Distribution:

Haley & Aldrich, Inc.

Form 4004

GEOPROBE BORING REPORT

BORING NO.

Page 1 **of**

PROJECT
LOCATION
CLIENT
CONTRACTOR
DRILLER

PROJECT MGR.
FIELD REP.
DATE STARTED
DATE FINISHED

Elevation ft.	**Datum**	**Boring Location**

Item	**Casing**	**Sampler**	**Core Barrel**
Type			
Inside Diameter (in.)			
Hammer Weight (lb.)			
Hammer Fall (in.)			

Rig Make & Model			**Hammer Type**	**Drilling Mud**	**Casing Advance**
☐ Truck	☐ Tripod	☐ Cat-Head	☐ Safety	☐ Bentonite	**Type Method Depth**
☐ ATV	☐ Geoprobe	☐ Winch	☐ Doughnut	☐ Polymer	
☐ Track	☐ Air Track	☐ Roller Bit	☐ Automatic	☐ None	
☐ Skid	☐ __________	☐ Cutting Head	**Drilling Notes:**		

Depth (ft.)	**Casing Blows**	**Sampler Blows per 6 in.**	**Sample No. & Recovery (in.)**	**Sample Depth (ft)**	**Elev./ Depth (ft)**	**Visual-Manual Identification & Description** (density/consistency, color, GROUP NAME & SYMBOL, maximum particle size*, structure, odor, moisture, optional descriptions, geologic interpretation)

Water Level Data					
			Depth in feet to:		
Date	**Time**	**Elapsed Time (hr.)**	**Bottom of Casing**	**Bottom of Hole**	**Water**
Date					

Sample ID

O	Open End Rod
T	Thin Wall Tube
U	Undisturbed Sample
S	Split Spoon Sample
G	Geoprobe

Summary

Overburden (Linear ft.) ____________
Rock Cored (Linear ft.) ____________
Number of Samples ____________

BORING NO.

***NOTE: Maximum Particle Size is determined by direct observation within the limitations of sampler size.**

NOTE: Soil descriptions based on a modified Burmister method of visual-manual identification

Form #3000

APPENDIX C
Quality Assurance Project Plan

www.haleyaldrich.com

QUALITY ASSURANCE PROJECT PLAN
558 SACKETT STREET
BROOKLYN, NY

by
Haley & Aldrich of New York
New York, New York

for
Sackett Heights LLC
Brooklyn, New York

File No. 0206384
January 2023

Executive Summary

This Quality Assurance Project Plan outlines the scope of the quality assurance and quality control activities associated with the site monitoring activities associated with the Remedial Investigation Work Plan for 558 Sackett Street in Brooklyn, New York (Site).

Protocols for sample collection, sample handling and storage, chain-of-custody procedures, and laboratory and field analyses are described herein or specifically referenced to related project documents.

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1. Project Description

This Quality Assurance Project Plan (QAPP) has been prepared as a component of the Remedial Investigation Work Plan (RIWP) for 558 Sackett Street in Brooklyn, New York (Site).

1.1 PROJECT OBJECTIVES

The primary objective for data collection activities is to collect sufficient data necessary to characterize the subsurface conditions at the Site and determine the nature and extent of contamination.

1.2 SITE DESCRIPTION AND HISTORY

The general Site description and Site history is provided in the Site Description and History Summary that accompanies the RIWP appended to the Brownfield Cleanup Program application for the Site and incorporated herein by reference.

1.3 LABORATORY PARAMETERS

The laboratory parameters for soil include:

- Target Compound List volatile organic compounds (VOCs) using EPA method 8260B
- Target Compound List semi-volatile organic compounds (SVOCs) using EPA method 8270C
- Total Analyte List (TAL) Metals using EPA method 6010
- TCL Pesticides using EPA method 8081B
- Polychlorinated biphenyls (PCBs) using EPA method 8082
- Per- and polyfluoroalkyl substances (PFAS) using EPA method 1633
- 1,4-Dioxane using EPA method 8270

The laboratory parameters for groundwater include:

- Target Compound List VOCs using EPA method 8260C
- Target Compound List SVOCs using EPA method 8270C
- TAL Metals using EPA method 6010
- PFAS using EPA method 1633
- 1,4-Dioxane using EPA method 8270 SIM

Note: 1,4-Dioxane and PFAS sampling techniques will be conducted following the NYSDEC Collection of Groundwater Samples for PFAS from Monitoring Wells Sample Protocol.

During the collection of groundwater samples, pH, specific conductivity, temperature, dissolved oxygen (DO), and oxidation/reduction potential (ORP) will be measured until stabilized.

The analytical laboratory parameters for soil vapor samples include:

- VOCs using EPA method TO-15

Laboratory parameters for disposal samples will be determined by the disposal facility after an approved facility has been determined.

1.4 SAMPLING LOCATIONS

The RIWP provides the locations of soil borings, soil vapor implants and groundwater monitoring wells that will be sampled (as applicable).

2. Project Organization and Responsibilities

This section defines the roles and responsibilities of the individuals who will perform the RIWP monitoring activities. A NYSDOH certified analytical laboratory will perform the analyses of environmental samples collected at the Site.

2.1 MANAGEMENT RESPONSIBILITIES

The Project Manager is responsible for managing the implementation of the RIWP/ and monitoring and coordinating the collection of data. The Project Manager is responsible for technical quality control (QC) and project oversight. The Project Manager responsibilities include the following:

- Acquire and apply technical and corporate resources as needed to ensure performance within budget and schedule restraints;
- Review work performed to ensure quality, responsiveness, and timeliness;
- Communicate with the client point of contact concerning the progress of the monitoring activities;
- Assure corrective actions are taken for deficiencies cited during audits of RIWP monitoring activities; and,
- Assure compliance with Site health and safety plan.

2.2 QUALITY ASSURANCE RESPONSIBILITIES

The Quality Assurance (QA) team will consist of a QA Officer and the Data Validation Staff. QA responsibilities are described as follows:

2.2.1 Quality Assurance Officer

The QA Officer reports directly to the Project Manager and will be responsible for overseeing the review of field and laboratory data. Additional responsibilities include the following:

- Assure the application and effectiveness of the QAPP by the analytical laboratory and the project staff;
- Provide input to the Project Manager as to corrective actions that may be required as a result of the above-mentioned evaluations; and,
- Prepare and/or review data validation and audit reports.

The QA Officer will be assisted by the Data Validation staff in the evaluation and validation of field and laboratory generated data.

2.2.2 Data Validation Staff

The Data Validation Staff will be independent of the laboratory and familiar with the analytical procedures performed. The validation will include a review of each validation criterion as prescribed by the guidelines presented in Section 9.2 of this document and be presented in a Data Usability Summary Report (DUSR) for submittal to the QA Officer.

2.3 LABORATORY RESPONSIBILITIES

Laboratory services in support of the RIWP monitoring include the following personnel:

2.3.1 Laboratory Project Manager

The Laboratory Project Manager will report directly to the QA Officer and Project Manager and will be responsible for ensuring all resources of the laboratory are available on an as-required basis. The Laboratory Project Manager will also be responsible for the approval of the final analytical reports.

2.3.2 Laboratory Operations Manager

The Laboratory Operations Manager will report to the Laboratory Project Manager and will be responsible for coordinating laboratory analysis, supervising in-house chain-of-custody reports, scheduling sample analyses, overseeing data review and overseeing preparation of analytical reports.

2.3.3 Laboratory QA Officer

The Laboratory QA Officer will have sole responsibility for review and validation of the analytical laboratory data. The Laboratory QA Officer will provide Case Narrative descriptions of any data quality issues encountered during the analyses conducted by the laboratory. The QA Officer will also define appropriate QA procedures, overseeing QA/QC documentation.

2.3.4 Laboratory Sample Custodian

The Laboratory Sample Custodian will report to the Laboratory Operations Manager and will be responsible for the following:

- Receive and inspect the incoming sample containers;
- Record the condition of the incoming sample containers;
- Sign appropriate documents;
- Verify chain-of-custody and its correctness;
- Notify the Project Manager and Operations Manager of sample receipt and inspection;
- Assign a unique identification number and enter each into the sample receiving log;
- Initiate transfer of samples to laboratory analytical sections; and,
- Control and monitor access/storage of samples and extracts.

2.3.5 Laboratory Technical Personnel

The Laboratory Technical Personnel will have the primary responsibility in the performance of sample analysis and the execution of the QA procedures developed to determine the data quality. These activities will include the proper preparation and analysis of the project samples in accordance with the laboratory’s Quality Assurance Manual (QAM) and associated Standard Operating Procedures (SOP).

2.4 FIELD RESPONSIBILITIES

2.4.1 Field Coordinator

The Field Coordinator is responsible for the overall operation of the field team and reports directly to the Project Manager. The Field Coordinator works with the project Health & Safety Officer (HSO) to conduct operations in compliance with the project Health & Safety Plan (HASP). The Field Coordinator will facilitate communication and coordinate efforts between the Project Manager and the field team members.

Other responsibilities include the following:

- Develop and implement field-related work plans, ensuring schedule compliance, and adhering to management-developed project requirements;
- Coordinate and manage field staff;
- Perform field system audits;
- Oversee QC for technical data provided by the field staff;
- Prepare and approve text and graphics required for field team efforts;
- Coordinate and oversee technical efforts of subcontractors assisting the field team;
- Identify problems in the field; resolve difficulties in consultation with the Project QAO, and Project Manager; implement and document corrective action procedures; and,
- Participate in preparation of the final reports.

2.4.2 Field Team Personnel

Field Team Personnel will be responsible for the following:

- Perform field activities as detailed in the RIWP and in compliance with the Field Sampling Plan (FSP) and QAPP.
- Immediately report any accidents and/or unsafe conditions to the Site HSO and take reasonable precautions to prevent injury.

3. Sampling Procedures

The FSP provides the SOPs for sampling required by the RIWP. Sampling will be conducted in general accordance with the NYSDEC Technical Guidance for Site Investigation and Remediation (DER-10) and the Sampling, Analysis and Assessment of PFAS under NYSDEC Part 375 Remedial Program when applicable.

3.1 SAMPLE CONTAINERS

Sample containers for each sampling task will be provided by the laboratory performing the analysis. The containers will be cleaned by the manufacturer to meet or exceed the analyte specifications established in the USEPA, “Specifications and Guidance for Obtaining Contaminant-Free Sample Containers”, April 1992, OSWER Directive #9240.0-0.5A. Certificates of analysis for each lot of sample containers used will be maintained by the laboratory.

The appropriate sample containers, preservation method, maximum holding times, and handling requirements for each sampling task are provided in Table I.

3.2 SAMPLE LABELING

Each sample will be labeled with a unique sample identifier that will facilitate tracking and cross-referencing of sample information. Equipment rinse blank and field duplicate samples also will be numbered with a unique sample identifier to prevent analytical bias of field QC samples.

Refer to the FSP for the sample labeling procedures.

3.3 FIELD QC SAMPLE COLLECTION

3.3.1 Field Duplicate Sample Collection

3.3.1.1 Water Samples

Field duplicate samples will be collected by filling the first sample container to the proper level and sealing and then repeated for the second set of sample container.

1. The samples are properly labeled as specified in Section 3.2.
2. Steps 1 through 4 are repeated for the bottles for each analysis. The samples are collected in order of decreasing analyte volatility as detailed in Section 3.3.1.
3. Chain-of-custody documents are executed.
4. The samples will be handled as specified in Table I.

3.3.1.2 Soil Samples

Soil field duplicates will be collected as specified in the following procedure:

1. Soils will be sampling directly from acetate liners.

2. Soil for VOC analysis will be removed from the sampling device as specified in the FSP.
3. Soil for non-VOC analysis will be removed from the sampling device and collected into clean laboratory provided containers.

4. Custody Procedures

Sample custody is addressed in three parts: field sample collection, laboratory analysis and final project files. Custody of a sample begins when it is collected by or transferred to an individual and ends when that individual relinquishes or disposes of the sample.

A sample is under custody if:

1. The item is in actual possession of a person;
2. The item is in the view of the person after being in actual possession of the person;
3. The item was in actual possession and subsequently stored to prevent tampering; or
4. The item is in a designated and identified secure area.

4.1 FIELD CUSTODY PROCEDURES

Field personnel will keep written records of field activities on applicable preprinted field forms or in a bound field notebook to record data collecting activities. These records will be written legibly in ink and will contain pertinent field data and observations. Entry errors or changes will be crossed out with a single line, dated, and initialed by the person making the correction. Field forms and notebooks will be periodically reviewed by the Field Coordinator.

The beginning of each entry in the logbook or preprinted field form will contain the following information:

- Date;
- Start time;
- Weather;
- Names of field personnel (including subcontractors);
- Level of personal protection used at the Site; and,
- Names of all visitors and the purpose of their visit.

For each measurement and sample collected, the following information will be recorded:

- Detailed description of sample location;
- Equipment used to collect sample or make measurement and the date equipment was calibrated;
- Time sample was collected;
- Description of the sample conditions;
- Depth sample was collected (if applicable);
- Volume and number of containers filled with the sample; and,
- Sampler’s identification.

4.1.1 Field Procedures

The following procedure describes the process to maintain the integrity of the samples:

- Upon collection samples are placed in the proper containers. In general, samples collected for organic analysis will be placed in pre-cleaned glass containers and samples collected for inorganic analysis will be placed in pre-cleaned plastic (polyethylene) bottles. Refer to the FSP for sample packaging procedures.

- Samples will be assigned a unique sample number and will be affixed to a sample label. Refer to the FSP for sample labeling procedures.

- Samples will be properly and appropriately preserved by field personnel in order to minimize loss of the constituent(s) of interest due to physical, chemical or biological mechanisms.

- Appropriate volumes will be collected to ensure that the appropriate reporting limits can be successfully achieved and that the required QC sample analyses can be performed.

4.1.2 Transfer of Custody and Shipment Procedures

- A chain-of-custody (COC) record will be completed at the time of sample collection and will accompany each shipment of project samples to the laboratory. The field personnel collecting the samples will be responsible for the custody of the samples until the samples are relinquished to the laboratory. Sample transfer will require the individuals relinquishing and receiving the samples to sign, date and note the time of sample transfer on the COC record.

- Samples will be shipped or delivered in a timely fashion to the laboratory so that holding times and/or analysis times as prescribed by the methodology can be met.

- Samples will be transported in containers (coolers) which will maintain the refrigeration temperature for those parameters for which refrigeration is required in the prescribed preservation protocols.

- Samples will be placed in an upright position and limited to one layer of samples per cooler. Additional bubble wrap or packaging material will be added to fill the cooler. Shipping containers will be secured with strapping tape and custody tape for shipment to the laboratory.

- When samples are split with the NYSDEC representatives, a separate chain-of-custody will be prepared and marked to indicate with whom the samples are shared. The person relinquishing the samples will require the representative’s signature acknowledging sample receipt.

- If samples are sent by a commercial carrier, a bill of lading will be used. A copy of the bill of lading will be retained as part of the permanent record. Commercial carriers will not sign the custody record as long as the custody record is sealed inside the sample cooler and the custody tape remains intact.

- Samples will be picked up by a laboratory courier or transported to the laboratory the same day they are collected unless collected on a weekend or holiday. In these cases, the samples will be stored in a secure location until delivery to the laboratory. Additional ice will be added to the cooler as needed to maintain proper preservation temperatures.

4.2 LABORATORY CHAIN-OF-CUSTODY PROCEDURES

A sample custodian will be designated by the laboratory and will have the responsibility to receive all incoming samples. Once received, the custodian will document if the sample is received in good condition (i.e., unbroken, cooled, etc.) and that the associated paperwork, such as chain-of-custody forms have been completed. The custodian will sign the chain-of-custody forms.

The custodian will also document if sufficient sample volume has been received to complete the analytical program. The sample custodian will then place the samples into secure, limited access storage (refrigerated storage, if required). The sample custodian will assign a unique number to each incoming sample for use in the laboratory. The unique number will then be entered into the sample-receiving log with the verified time and date of receipt also noted.

Consistent with the analyses requested on the chain-of-custody form, analyses by the laboratory's analysts will begin in accordance with the appropriate methodologies. Samples will be removed from secure storage with internal chain-of-custody sign-out procedures followed.

4.3 STORAGE OF SAMPLES

Empty sample bottles will be returned to secure and limited access storage after the available volume has been consumed by the analysis. Upon completion of the entire analytical work effort, samples will be disposed of by the sample custodian. The length of time that samples are held will be at least thirty (30) days after reports have been submitted. Disposal of remaining samples will be completed in compliance with all Federal, State and local requirements.

4.4 FINAL PROJECT FILES CUSTODY PROCEDURES

The final project files will be the central repository for all documents with information relevant to sampling and analysis activities as described in this QAPP. The Haley & Aldrich Project Manager will be the custodian of the project file. The project files including all relevant records, reports, logs, field notebooks, pictures, subcontractor reports and data reviews will be maintained in a secured, limited access area and under custody of the Project Director or his designee.

The final project file will include the following:

- Project plans and drawings;
- Field data records;
- Sample identification documents and soil boring/monitoring well logs;
- All chain-of-custody documentation;
- Correspondence;
- References, literature;
- Laboratory data deliverables;
- Data validation and assessment reports;
- Progress reports, QA reports; and,
- A final report.

The laboratory will be responsible for maintaining analytical logbooks, laboratory data and sample chain of custody documents. Raw laboratory data files and copies of hard copy reports will be inventoried and maintained by the laboratory for a period of six years at which time the laboratory will contact the Haley & Aldrich Project Manager regarding the disposition of the project related files.

5. Calibration Procedures and Frequency

5.1 FIELD INSTRUMENT CALIBRATION PROCEDURES

Several field instruments will be used for both on-site screening of samples and for health and safety monitoring, as described in the HASP. On-site air monitoring for health and safety purposes may be accomplished using a vapor detection device, such as a Photo-ionization Detector (PID).

Field instruments will be calibrated at the beginning of each day and checked during field activities to verify performance. Instrument specific calibration procedures will be performed in accordance with the instrument manufacturer’s requirements.

5.2 LABORATORY INSTRUMENT CALIBRATION PROCEDURES

Reference materials of known purity and quality will be utilized for the analysis of environmental samples. The laboratory will carefully monitor the preparation and use of reference materials including solutions, standards, and reagents through well-documented procedures.

All solid chemicals and acids/bases used by the laboratory will be rated as “reagent grade” or better. All gases will be “high” purity or better. All Standard Reference Materials (SRMs) or Performance Evaluation (PE) materials will be obtained from approved vendors of the National Institute of Standards and Technology (formerly National Bureau of Standards), the U.S. EPA Environmental Monitoring Support Laboratories (EMSL), or reliable Cooperative Research and Development Agreement (CRADA) certified commercial sources.

6. Analytical Procedures

Analytical procedures to be utilized for analysis of environmental samples will be based on referenced USEPA analytical protocols and/or project specific SOP.

6.1 FIELD ANALYTICAL PROCEDURES

Field analytical procedures include the measurement of pH, temperature, ORP, DO and specific conductivity during sampling of groundwater, and the qualitative measurement of VOC during the collection of soil samples.

6.2 LABORATORY ANALYTICAL PROCEDURES

Laboratory analyses will be based on the USEPA methodology requirements promulgated in:

- "Test Methods for Evaluating Solid Waste," SW-846 EPA, Office of Solid Waste, and promulgated updates, 1986.

6.2.1 List of Project Target Compounds and Laboratory Detection Limits

The laboratory reporting limits (RLs) and associated method detection limits (MDLs) for the target analytes and compounds for the environmental media to be analyzed are presented in Table I. MDLs have been experimentally determined by the project laboratory using the method provided in 40 CFR, Part 136 Appendix B.

Laboratory parameters for soil samples are listed in the RIWP. Laboratory parameters for disposal samples will be determined by the disposal facility after an approved facility has been determined.

6.2.2 List of Method Specific Quality Control Criteria

The laboratory SOPs include a section that presents the minimum QC requirements for the project analyses. Section 7.0 references the frequency of the associated QC samples for each sampling effort and matrix.

7. Internal Quality Control Checks

This section presents the internal QC checks that will be employed for field and laboratory measurements.

7.1 FIELD QUALITY CONTROL

7.1.1 Field Blanks

Internal QC checks will include analysis of field blanks to validate equipment cleanliness. Whenever possible, dedicated equipment will be employed to reduce the possibility of cross-contamination of samples.

7.1.2 Trip Blanks

Trip blanks samples will be prepared by the project laboratory using ASTM Type II or equivalent water placed within pre-cleaned 40 milliliter (ml) VOC vials equipped with Teflon septa. Trip blanks will accompany each sample delivery group (SDG) of environmental samples collected for analysis of VOCs.

Trip blank samples will be placed in each cooler that stores and transports project samples that are to be analyzed for VOCs.

7.2 LABORATORY PROCEDURES

Procedures which contribute to maintenance of overall laboratory quality assurance and control include appropriately cleaned sample containers, proper sample identification and logging, applicable sample preservation, storage, and analysis within prescribed holding times, and use of controlled materials.

7.2.1 Field Duplicate Samples

The precision or reproducibility of the data generated will be monitored through the use of field duplicate samples. Field duplicate analysis will be performed at a frequency of 1 in 20 project samples.

Precision will be measured in terms of the absolute value of the relative percent difference (RPD) as expressed by the following equation:

$$RPD = [|R1-R2|/[(R1+R2)/2]] \times 100\%$$

Acceptance criteria for duplicate analyses performed on solid matrices will be 100% and aqueous matrices will be 35%. RPD values outside these limits will require an evaluation of the sampling and/or analysis procedures by the project QA Officer and/or laboratory QA Director. Corrective actions may include re-analysis of additional sample aliquots and/or qualification of the data for use.

7.2.2 Matrix Spike Samples

Ten percent of each project sample matrix for each analytical method performed will be spiked with known concentrations of the specific target compounds/analytes.

The amount of the compound recovered from the sample compared to the amount added will be expressed as a percent recovery. The percent recovery of an analyte is an indication of the accuracy of an analysis within the site-specific sample matrix. Percent recovery will be calculated for matrix spike and matrix spike duplicate (MS/MSD) samples using the following equation.

$$\%\ Recovery = \frac{Spiked\ Sample\ -\ Background}{Known\ Value\ of\ Spike} \times 100\%$$

If the QC value falls outside the control limits (UCL or LCL) due to sample matrix effects, the results will be reported with appropriate data qualifiers. To determine the effect a non-compliant MS recovery has on the reported results, the recovery data will be evaluated as part of the validation process.

7.2.3 Laboratory Control Sample Analyses

The laboratory will perform Laboratory Control Sample (LCS) analyses prepared from SRMs. The SRMs will be supplied from an independent manufacturer and traceable to NIST materials with known concentrations of each target analyte to be determined by the analytical methods performed. In cases where an independently supplied SRM is not available, the LCS may be prepared by the laboratory from a reagent lot other than that used for instrument calibration.

The laboratory will evaluate LCS analyses in terms of percent recovery using the most recent laboratory generated control limits.

LCS recoveries that do not meet acceptance criteria will be deemed invalid. Analysis of project samples will cease until an acceptable LCS analysis has been performed. If sample analysis is performed in association with an out-of-control LCS sample analysis, the data will be deemed invalid.

Corrective actions will be initiated by the Haley & Aldrich QA Officer and/or Laboratory QA Officer to investigate the problem. After the problem has been identified and corrected, the solution will be noted in the instrument run logbook and re-analysis of project samples will be performed, if possible.

The analytical anomaly will be noted in the sample delivery group (SDG) Case Narrative and reviewed by the data validator. The data validator will confirm that appropriate corrective actions were implemented and recommend the applicable use of the affected data.

7.2.4 Surrogate Compound/Internal Standard Recoveries

For VOCs, surrogates will be added to each sample prior to analysis to establish purge and trap efficiency. Quantitation will be accomplished via internal standardization techniques.

The recovery of surrogate compounds and internal standards will be monitored by laboratory personnel to assess possible site-specific matrix effects on instrument performance.

For SVOC analyses, surrogates will be added to the raw sample to assess extraction efficiency. Internal standards will be added to all sample extracts and instrument calibration standard immediately before analysis for quantitation via internal standardization techniques.

Method specific QC limits are provided in the attached laboratory method SOPs. Surrogate compound/internal standard recoveries that do not fall within accepted QC limits for the analytical methodology performed will have the analytical results flagged with data qualifiers as appropriate by the laboratory and will not be noted in the laboratory report Case Narrative.

To ascertain the effect non-compliant surrogate compound/internal standard recoveries may have on the reported results, the recovery data will be evaluated as part of the validation process. The data validator will provide recommendations for corrective actions including but not limited to additional data qualification.

7.2.5 Calibration Verification Standards

Calibration verification (CV) standards will be utilized to confirm instrument calibrations and performance throughout the analytical process. CV standards will be prepared as prescribed by the respective analytical protocols. Continuing calibration will be verified by compliance with method-specific criteria prior to additional analysis of project samples.

Non-compliant analysis of CV standards will require immediate corrective action by the project laboratory QA officer and/or designated personnel. Corrective action may include re-analysis of each affected project sample, a detailed description of the problem, the corrective action undertaken, the person who performed the action, and the resolution of the problem.

7.2.6 Laboratory Method Blank Analyses

Method blank sample analysis will be performed as part of each analytical batch for each methodology performed. If target compounds are detected in the method blank samples, the reported results will be flagged by the laboratory in accordance with standard operating procedures. The data validator will provide recommendations for corrective actions including but not limited to additional data qualification.

8. Data Quality Objectives

Sampling that will be performed as described in the RIWP is designed to produce data of the quality necessary to achieve the minimum standard requirements of the field and laboratory analytical objectives described below. These data are being obtained with the primary objective to assess levels of contaminants of concern associated with the Site.

The overall project data quality objective (DQO) is to implement procedures for field data collection, sample collection, handling, and laboratory analysis and reporting that achieve the project objectives. The following section is a general discussion of the criteria that will be used to measure achievement of the project DQO.

8.1 PRECISION

8.1.1 Definition

Precision is defined as a quantitative measure of the degree to which two or more measurements are in agreement. Precision will be determined by collecting and analyzing field duplicate samples and by creating and analyzing laboratory duplicates from one or more of the field samples. The overall precision of measurement data is a mixture of sampling and analytical factors. The analytical results from the field duplicate samples will provide data on sampling precision. The results from duplicate samples created by the laboratory will provide data on analytical precision. The measurement of precision will be stated in terms of RPD.

8.1.2 Field Precision Sample Objectives

Field precision will be assessed through collection and measurement of field duplicate samples at a rate of 1 duplicate per 20 investigative samples. The RPD criteria for the project field duplicate samples will be +/- 100% for soil, +/- 35 % for groundwater for parameters of analysis detected at concentrations greater than 5 times (5X) the laboratory RL.

8.1.3 Laboratory Precision Sample Objectives

Laboratory precision will be assessed through the analysis of LCS and laboratory control duplicate samples (LCS/LCSD) and MS/MSD samples for groundwater and soil samples and the analysis of laboratory duplicate samples for air and soil vapor samples. Air and soil vapor laboratory duplicate sample analyses will be performed by analyzing the same SUMMA canister twice. The RPD criteria for the air/soil vapor laboratory duplicate samples will be +/- 35 % for parameters of analysis detected at concentrations greater than 5 times (5X) the laboratory RL.

8.2 ACCURACY

8.2.1 Definition

Accuracy relates to the bias in a measurement system. Bias is the difference between the observed and the "true" value. Sources of error are the sampling process, field contamination, preservation techniques, sample handling, sample matrix, sample preparation and analytical procedure limitations.

8.2.2 Field Accuracy Objectives

Sampling bias will be assessed by evaluating the results of field equipment rinse and trip blanks. Equipment rinse and trip blanks will be collected as appropriate based on sampling and analytical methods for each sampling effort.

If non-dedicated sampling equipment is used, equipment rinse blanks will be collected by passing ASTM Type II water over and/or through the respective sampling equipment utilized during each sampling effort. One equipment rinse blank will be collected for each type of non-dedicated sampling equipment used for the sampling effort. Equipment rinse blanks will be analyzed for each target parameter for the respective sampling effort for which environmental media have been collected. (Note: If dedicated or disposable sampling equipment is used, equipment rinse samples will not be collected as part of that field effort.)

Trip blank samples will be prepared by the laboratory and provided with each shipping container that includes containers for the collection of groundwater samples for the analysis of VOC. Trip blank samples will be analyzed for each VOC for which groundwater samples have been collected for analysis.

8.3 LABORATORY ACCURACY OBJECTIVES

Analytical bias will be assessed through the use of laboratory control samples (LCS) and Site-specific matrix spike (MS) sample analyses. LCS analyses will be performed with each analytical batch of project samples to determine the accuracy of the analytical system.

One set of MS/MSD analyses will be performed with each batch of 20 project samples collected for analysis to assess the accuracy of the identification and quantification of analytes within the Site-specific sample matrices. Additional sample volume will be collected at sample locations selected for the preparation of MS/MSD samples so that the standard laboratory RLs are achieved.

The accuracy of analyses that include a sample extraction procedure will be evaluated through the use of system monitoring or surrogate compounds. Surrogate compounds will be added to each sample, standard, blank, and QC sample prior to sample preparation and analysis. Surrogate compound percent recoveries will provide information on the effect of the sample matrix on the accuracy of the analyses.

8.4 REPRESENTATIVENESS

8.4.1 Definition

Representativeness expresses the degree to which sample data represent a characteristic of a population, a parameter variation at a sampling point or an environmental condition. Representativeness is a qualitative parameter that is dependent upon the design of the sampling program. The representativeness criterion is satisfied through the proper selection of sampling locations, the quantity of samples and the use of appropriate procedures to collect and analyze the samples.

8.4.2 Measures to Ensure Representativeness of Field Data

Representativeness will be addressed by prescribing sampling techniques and the rationale used to select sampling locations. Sampling locations may be biased (based on existing data, instrument surveys, observations, etc.) or unbiased (completely random or stratified-random approaches).

8.5 COMPLETENESS

8.5.1 Definition

Completeness is a measure of the amount of valid (usable) data obtained from a measuring system compared to the total amount of the anticipated to be obtained. The completeness goal for all data uses is that a sufficient amount of valid data be generated so that determinations can be made related to the intended data use with a sufficient degree of confidence.

8.5.2 Field Completeness Objectives

Completeness is a measure of the amount of valid measurements obtained from measurements taken in this project versus the number planned. Field completeness objective for this project will be greater than (>) 90%.

8.5.3 Laboratory Completeness Objectives

Laboratory data completeness objective is a measure of the amount of valid data obtained from laboratory measurements. The evaluation of the data completeness will be performed at the conclusion of each sampling and analysis effort.

The completeness of the data generated will be determined by comparing the amount of valid data, based on independent validation, with the total laboratory data set. The completeness goal will be >90%.

8.6 COMPARABILITY

8.6.1 Definition

Comparability is a qualitative parameter expressing the confidence with which one data set can be compared to another.

8.6.2 Measures to Ensure Comparability of Laboratory Data

Comparability of laboratory data will be measured from the analysis of SRM obtained from either EPA Cooperative Research and Development Agreement (CRADA) suppliers or the National Institute of Standards and Technology (NIST). The reported analytical data will also be presented in standard units of mass of contaminant within a known volume of environmental media. The standard units for various sample matrices are as follows:

- Solid Matrices – mg/kg of media (Dry Weight).
- Aqueous Matrices – ng/L for PFAS analyses, ug/L of media for organic analyses, and mg/L for inorganic analyses.

8.7 LEVEL OF QUALITY CONTROL EFFORT

If non-dedicated sampling equipment is used, equipment rinse blanks will be prepared by field personnel and submitted for analysis of target parameters. Equipment rinse blank samples will be analyzed to check for potential cross-contamination between sampling locations that may be introduced during the investigation. One equipment rinse blank will be collected per sampling event to the extent that non-dedicated sampling equipment is used.

If necessary, A separate equipment rinse blank sample will be collected for PFAS using the sample collection procedure described in Section 8.1.1 of the NYSDEC-approved Avangrid Field Sampling Plan. (Note: If dedicated or disposable sampling equipment is used, equipment rinse samples will not be collected as part of that field effort.)

Trip blanks will be used to assess the potential for contamination during sample storage and shipment. Trip blanks will be provided with the sample containers to be used for the collection of groundwater samples for the analysis of VOC. Trip blanks will be preserved and handled in the same manner as the project samples. One trip blank will be included along with each shipping container containing project samples to be analyzed for VOC.

Method blank samples will be prepared by the laboratory and analyzed concurrently with all project samples to assess potential contamination introduced during the analytical process.

Field duplicate samples will be collected and analyzed to determine sampling and analytical reproducibility. One field duplicate will be collected for every 20 or fewer investigative samples collected for off-Site laboratory analysis.

Matrix spikes will provide information to assess the precision and accuracy of the analysis of the target parameters within the environmental media collected. One MS/MSD will be collected for every 20 or fewer investigative samples per sample matrix.

(Note: Soil MS/MSD samples require triple sample volume for VOC only. Aqueous MS/MSD samples require triple the normal sample volume for VOC analysis and double the volume for the remaining parameters.)

9. Data Reduction, Validation and Reporting

Data generated by the laboratory operation will be reduced and validated prior to reporting in accordance with the following procedures:

9.1 DATA REDUCTION

9.1.1 Field Data Reduction Procedures

Field data reduction procedures will be minimal in scope compared to those implemented in the laboratory setting. The pH, conductivity, temperature, turbidity, DO, ORP and breathing zone VOC readings collected in the field will be generated from direct read instruments. The data will be written into field logbooks immediately after measurements are taken. If errors are made, data will be legibly crossed out, initialed and dated by the field member, and corrected in a space adjacent to the original entry.

9.1.2 Laboratory Data Reduction Procedures

Laboratory data reduction procedures are provided by the appropriate chapter of USEPA, "Test Methods for Evaluating Solid Waste", SW-846, Third Edition. Errors will be noted; corrections made with the original notations crossed out legibly. Analytical results for soil samples will be calculated and reported on a dry weight basis.

9.1.3 Quality Control Data

QC data (e.g., laboratory duplicates, surrogates, matrix spikes, and matrix spike duplicates) will be compared to the method acceptance criteria. Data determined to be acceptable will be entered into the laboratory information management system.

Unacceptable data will be appropriately qualified in the project report. Case narratives will be prepared which will include information concerning data that fell outside acceptance limits and any other anomalous conditions encountered during sample analysis.

9.2 DATA VALIDATION

Data validation procedures of the analytical data will be performed by the Haley & Aldrich QA Officer or designee using the following documents as guidance for the review process:

- "U.S. EPA National Functional Guidelines for Organic Data Review", and the "U.S. EPA National Functional Guidelines for Inorganic Data Review".

- The specific data qualifiers used will be applied to the reported results as presented and defined in the EPA National Functional Guidelines. Validation will be performed by qualified personnel at the direction of the Haley & Aldrich QAO. Tier 1 data validation (the equivalent of USEPA's Stage 2A validation) will be performed to evaluate data quality.

- The completeness of each data package will be evaluated by the Data Validator. Completeness checks will be administered on all data to determine that the deliverables are consistent with the NYSDEC ASP Category A and Category B data package requirements. The validator will determine whether the required items are present and request copies of missing deliverables (if necessary) from the laboratory.

9.3 DATA REPORTING

Data reporting procedures will be carried out for field and laboratory operations as indicated below:

- Field Data Reporting: Field data reporting will be conducted principally through the transmission of report sheets containing tabulated results of measurements made in the field and documentation of field calibration activities.

- Laboratory Data Reporting: The laboratory data reporting package will enable data validation based on the protocols described above. The final laboratory data report format will include the QA/QC sample analysis deliverables to enable the development of a data usability summary report (DUSR) based on Department DER-10 Appendix 2B.

10. Performance and System Audits

A performance audit is an independent quantitative comparison with data routinely obtained in the field or the laboratory. Performance audits include two separate, independent parts: internal and external audits.

10.1 FIELD PERFORMANCE AND SYSTEM AUDITS

10.1.1 Internal Field Audit Responsibilities

Internal audits of field activities will be initiated at the discretion of the Project Manager and will include the review of sampling and field measurements. The audits will verify that all procedures are being followed. Internal field audits will be conducted periodically during the project. The audits will include examination of the following:

- Field sampling records, screening results, instrument operating records;
- Sample collection;
- Handling and packaging in compliance with procedures;
- Maintenance of QA procedures; and,
- Chain-of-custody reports.

10.1.2 External Field Audit Responsibilities

External audits may be conducted by the Project Coordinator at any time during the field operations. These audits may or may not be announced and are at the discretion of the NYSDEC. The external field audits can include (but are not limited to) the following:

- Sampling equipment decontamination procedures;
- Sample bottle preparation procedures;
- Sampling procedures;
- Examination of health and safety plans;
- Procedures for verification of field duplicates; and,
- Field screening practices.

10.2 LABORATORY PERFORMANCE AND SYSTEM AUDITS

10.2.1 Internal Laboratory Audit Responsibilities

The laboratory system audits are typically conducted by the laboratory QA Officer or designee on an annual basis. The system audit will include an examination of laboratory documentation including sample receiving logs, sample storage, chain-of-custody procedures, sample preparation and analysis and instrument operating records.

At the conclusion of internal system audits, reports will be provided to the laboratory's operating divisions for appropriate comment and remedial/corrective action where necessary. Records of audits and corrective actions will be maintained by the Laboratory QA Officer.

10.2.2 External Laboratory Audit Responsibilities

External audits will be conducted as required, by the NYSDOH or designee. External audits may include any of the following:

- Review of laboratory analytical procedures;
- Laboratory on-site visits; and,
- Submission of performance evaluation samples for analysis.

Failure of any of the above audit procedures can lead to laboratory de-certification. An audit may consist of but not limited to:

- Sample receipt procedures;
- Custody, sample security and log-in procedures;
- Review of instrument calibration logs;
- Review of QA procedures;
- Review of log books;
- Review of analytical SOPs; and,
- Personnel interviews.

A review of a data package from samples recently analyzed by the laboratory can include (but not be limited to) the following:

- Comparison of resulting data to the SOP or method;
- Verification of initial and continuing calibrations within control limits;
- Verification of surrogate recoveries and instrument timing results;
- Review of extended quantitation reports for comparisons of library spectra to instrument spectra, where applicable; and,
- Assurance that samples are run within holding times.

11. Preventive Maintenance

11.1 FIELD INSTRUMENT PREVENTIVE MAINTENANCE

The field equipment preventive maintenance program is designed to ensure the effective completion of the sampling effort and to minimize equipment down time. Program implementation is concentrated in three areas:

- Maintenance responsibilities;
- Maintenance schedules; and,
- Inventory of critical spare parts and equipment.

The maintenance responsibilities for field equipment will be assigned to the task leaders in charge of specific field operations. Field personnel will be responsible for daily field checks and calibrations and for reporting any problems with the equipment. The maintenance schedule will follow the manufacturer's recommendations. In addition, the field personnel will be responsible for determining that an inventory of spare parts will be maintained with the field equipment. The inventory will primarily contain parts that are subject to frequent failure, have limited useful lifetimes and/or cannot be obtained in a timely manner.

11.2 LABORATORY INSTRUMENT PREVENTIVE MAINTENANCE

Analytical instruments at the laboratory will undergo routine and/or preventive maintenance. The extent of the preventive maintenance will be a function of the complexity of the equipment.

Generally, annual preventive maintenance service will involve cleaning, adjusting, inspecting and testing procedures designed to deduce instrument failure and/or extend useful instrument life. Between visits, routine operator maintenance and cleaning will be performed according to manufacturer's specifications by laboratory personnel.

12. Specific Routine Procedures Used to Assess Data Precision, Accuracy, and Completeness

12.1 FIELD MEASUREMENTS

Field generated information will be reviewed by the Field Coordinator and typically include evaluation of bound logbooks/forms, data entry and calculation checks. Field data will be assessed by the Project Coordinator who will review the field results for compliance with the established QC criteria that are specified in Section 7.0 of this QAPP. The accuracy of pH and specific conductance will be assessed using daily instrument calibration, calibration check, and blank data. Accuracy will be measured by determining the percent recovery (% R) of calibration check standards. Precision of the pH and specific conductance measurements will be assessed on the basis of the reproducibility of duplicate readings of a field sample and will be measured by determining the RPD. Accuracy and precision of the soil VOC screening will be determined using duplicate readings of calibration checks. Field data completeness will be calculated using the following equation:

$$\text{Completeness} = \frac{\text{Valid (usable) Data Obtained}}{\text{Total Data Planned}} \text{ X } 100$$

12.2 LABORATORY DATA

Surrogate, internal standard and matrix spike recoveries will be used to evaluate data quality. The laboratory QA/QC program will include the following elements:

- Precision, in terms of RPD, will be determined by relative sample analysis at a frequency of one duplicate analysis for each batch of ten project samples or a frequency of 10%. RPD is defined as the absolute difference of duplicate measurements divided by the mean of these analyses normalized to percentage.

- Accuracy, in terms of percent recovery (recovery of known constituent additions or surrogate recoveries), will be determined by the analysis of spiked and unspiked samples. MS/MSD will be used to determine analytical accuracy. The frequency of MS/MSD analyses will be one project sample MS/MSD per set of 20 project samples.

- One method blank will be prepared and analyzed with each batch of project samples. The total number of method blank sample analyses will be determined by the laboratory analytical batch size.

- SRMs will be used for each analysis. Sources of SRM's include the U.S. EPA, commercially available material from CRADA certified vendors and/or laboratory produced solutions. SRMs, when available and appropriate, will be processed and analyzed on a frequency of one per set of samples.

- Completeness is the evaluation of the amount of valid data generated versus the total set of data produced from a particular sampling and analysis event. Valid data is determined by independent confirmation of compliance with method-specific and project-specific data quality objectives. The calculation of data set completeness will be performed by the following equation.

$$\frac{Number\ of\ Valid\ Sample\ Results}{Total\ Number\ of\ Samples\ Planned}\ X\ 100 = \%\ Complete$$

13. Quality Assurance Reports

Critically important to the successful implementation of the QA Plan is a reporting system that provides the means by which the program can be reviewed, problems identified, and programmatic changes made to improve the plan.

QA reports to management can include:

- Audit reports, internal and external audits with responses;
- Performance evaluation sample results; internal and external sources; and,
- Daily QA/QC exception reports/corrective actions.

QA/QC corrective action reports will be prepared by the Haley & Aldrich QA Officer when appropriate and presented to the project and/or laboratory management personnel so that performance criteria can be monitored for all analyses from each analytical department. The updated trend/QA charts prepared by the laboratory QA personnel will be distributed and reviewed by various levels of the laboratory management.

References

1. United States Environmental Protection Agency, (1999). EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations. EPA QA/R-5 Interim Final, November 1999.

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4. United States Environmental Protection Agency, (1992). Specifications and Guidance for Contaminant-Free Sample Containers. OSWER Directive 9240.0-05A, April 1992.

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7. United States Environmental Protection Agency. Test Methods for Evaluating Solid Waste, Office of Solid Waste, U.S. EPA, SW-846, November 1986, with updates.

8. New York State Department of Environmental Conservation, NYSDEC Analytical Services Protocol (ASP), Bureau of Environmental Investigation, 1991 with updates.

9. New York State Department of Environmental Conservation, NYSDEC, Division of Environmental Remediation, Technical Guidance for Site Investigation and Remediation, DER-10, May 2010.

10. New York State Department of Environmental Conservation, NYSDEC, Division of Environmental Remediation, Sampling, Analysis and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC Part 375 Remedial Program, November 2022.

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TABLES

TABLE I

SUMMARY OF ANALYSIS METHOD, PRESERVATION METHOD, HOLDING TIME, SAMPLE SIZE REQUIREMENTS AND SAMPLE CONTAINERS

558 Sackett street
Brooklyn, NY

Analysis/Method	Sample Type	Preservation	Holding Time	Volume/Weight	Container
Volatile Organic Compounds/8260C	Soil	1 - 1 Vial MeOH/2 Vial Water, Cool, 4 ± 2 °C	14 days[1]	120 mL	3 - 40ml glass vials
Semivolatile Organic Compounds/8270D	Soil	Cool, 4 ± 2 °C	14 days	250 mL	1 - 8 oz Glass
Pesticides (8081B)	Soil	Cool, 4 ± 2 °C	14 days	250 mL	1 - 8 oz Glass
Polychlorinated Biphenyls/8082A	Soil	Cool, 4 ± 2 °C	14 days	250 mL	1 - 8 oz Glass
Metals/6010D	Soil	Cool, 4 ± 2 °C	180 days	60 mL	1 - 2 oz Glass
PFAS 1633	Soil	Cool, 4 ± 2 °C	14 days	250 mL	1 - 8 oz Glass
1,4-Dioxane 8270	Soil	Cool, 4 ± 2 °C	14 days	250 mL	1 - 8 oz Glass
Volatile Organic Compounds/8260C	Groundwater	HCl, Cool, 4 ± 2 °C	14 days	120 mL	3 - 40ml glass vials
Semivolatile Organic Compounds/8270D	Groundwater	Cool, 4 ± 2 °C	7 days	500 mL	2 - 250 mL amber glass
TAL Metals 6020	Groundwater	HNO_3Cool, 4 ± 2 °C	180 days	500 mL	1 - 500 mL plastic bottle
PFAS 1633	Groundwater	H2O Cool, 4 ± 2 °C	14 days	500 mL	2 - teflon free 250 ml plastic containers
1,4-Dioxane 8270 SIM	Groundwater	Cool, 4 ± 2 °C	7 days	500 mL	1 - 500 mL plastic bottle
Volatile Organic Compounds/TO-15	Soil Vapor	N/A	30 days	2.7 - 6 L	1 2.7 or 6 L Summa Canister

Notes:
1. Terracores and encores must be frozen within 48 hours of collection
2. Refer to text for additional information.

APPENDIX D
NYSDEC Emerging Contaminant Field Sampling Guidance

NEW YORK
STATE OF
OPPORTUNITY.

Department of
Environmental
Conservation

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

Under NYSDEC's Part 375 Remedial Programs

November 2022

www.dec.ny.gov

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November 2022

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

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	PFAS should be further assessed and considered as a potential contaminant of concern in groundwater or surface water (…) 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.	PFOA and PFOS should be further assessed and considered as potential contaminants of concern in groundwater or surface water (…) 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.	9/15/2020
Soil Sample Results, page 10	"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."	"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. " [Interim SCO Table] "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 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. "	9/15/2020

Citation and Page Number	Current Text	Corrected Text	Date
Testing for Imported Soil Page 11	Soil imported to a site for use in a soil cap, soil cover, or as backfill is to be tested for PFAS in general 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. 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.	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.	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	"In addition, further assessment of water may be warranted if either of the following screening levels are met: a. any other individual PFAS (not PFOA or PFOS) is detected in water at or above 100 ng/L; or b. total concentration of PFAS (including PFOA and PFOS) is detected in water at or above 500 ng/L"	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 text ….EPA 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	

November 2022

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

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]

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[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

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[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 ± 2º 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 ± 2º 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 ± 2º 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 ± 2º 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. **<u>The Bureau of Ecosystem Health will supply the bags.</u>** 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.

page ______ of ______

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

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	

richter: revised 21 April 2014; becker: 23 March 2017, 26 April, 2019

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 envelops, 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	PFDoA	307-55-1
	Perfluorotridecanoic acid	PFTrDA	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 6ºC 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

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

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.

APPENDIX E
Health and Safety Plan

HALEY & ALDRICH, INC.

SITE-SPECIFIC SAFETY PLAN

FOR

558 Sackett Street
Project/File No. 0206384-000

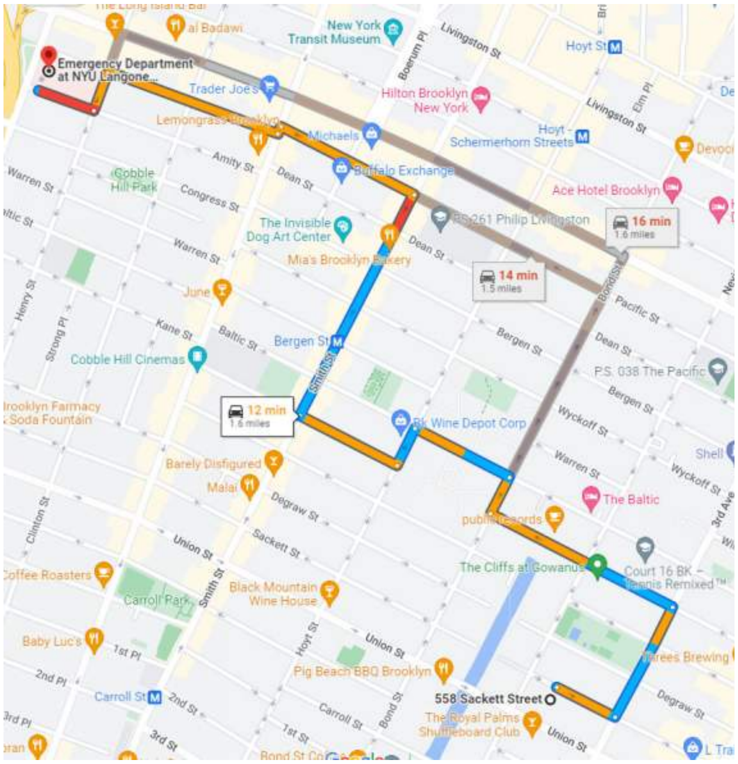
Prepared By: DiNardo, PJ	**Date: 08-30-2022**
Revised By:	**Date:**

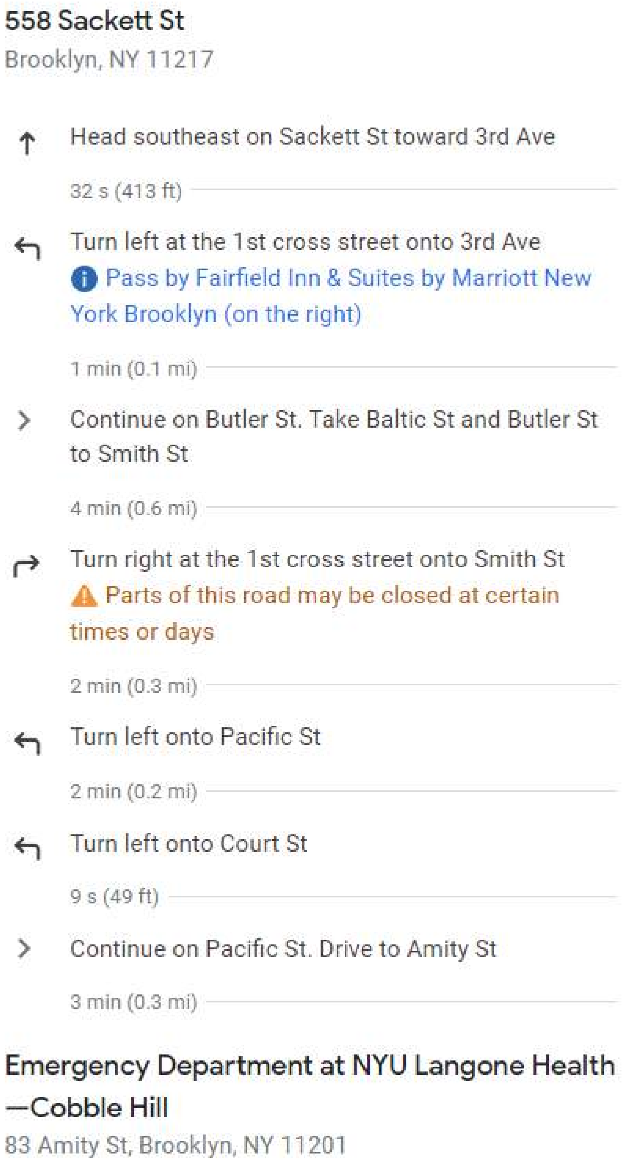
EMERGENCY INFORMATION

Project Name: 558 Sackett Street	**H&A File No:** 0206384-000
Location: 558 Sackett Street, Brooklyn, New York	
Client/Site Contact: Office Phone Number:	Sackett Heights LLC Schwimmer, Jacob 718.701.5680
Contractor: **Superintendent:** Phone Number:	Lakewood Environmental Services Corp. Kelly, Loraine 631.257-5321
H&A Project Manager: Office Phone Number: Cell Phone Number:	Conlon, Mari Cate 646.277.5688 347.271.1521
Field Safety Manager: Office Phone Number: Cell Phone Number:	Ferguson, Brian 617.886.7439 617.908.2761
Nearest Hospital: Address: (see map on next page) Phone Number:	**NYU Langone Health Cobble Hill** 83 Amity Street Brooklyn, NY 11201 646.754.7900
Nearest Occ. Health Clinic: Address: (see map on next page) Phone Number:	**MedRite Urgent Care Park Slope** 245 4th Avenue Brooklyn, NY 11215 718.407.1270
Liberty Mutual Claim Policy	**WC6Z111254100031**
Other Local Emergency Response Number:	911
Other Ambulance, Fire, Police, or Environmental Emergency Resources:	911

Emergency Hospital

NYU Langone Health Cobble Hill
83 Amity Street
Brooklyn, NY 11201
646.754.7900





558 Sackett St
Brooklyn, NY 11217

Head southeast on Sackett St toward 3rd Ave

32 s (413 ft)

Turn left at the 1st cross street onto 3rd Ave
Pass by Fairfield Inn & Suites by Marriott New York Brooklyn (on the right)

1 min (0.1 mi)

Continue on Butler St. Take Baltic St and Butler St to Smith St

4 min (0.6 mi)

Turn right at the 1st cross street onto Smith St
Parts of this road may be closed at certain times or days

2 min (0.3 mi)

Turn left onto Pacific St

2 min (0.2 mi)

Turn left onto Court St

9 s (49 ft)

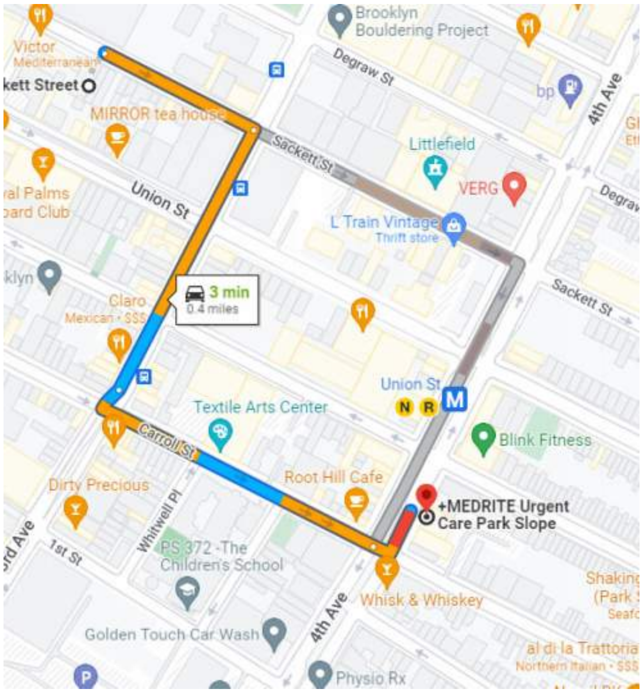
Continue on Pacific St. Drive to Amity St

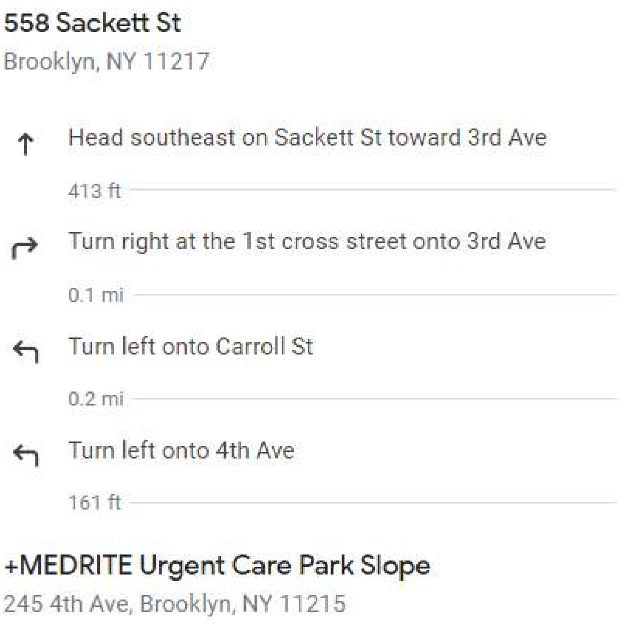
3 min (0.3 mi)

Emergency Department at NYU Langone Health —Cobble Hill
83 Amity St, Brooklyn, NY 11201

Clinic

MedRite Urgent Care Park Slope
245 4th Avenue
Brooklyn, NY 11215
718.407.1270





558 Sackett St
Brooklyn, NY 11217

↑ Head southeast on Sackett St toward 3rd Ave

413 ft

↱ Turn right at the 1st cross street onto 3rd Ave

0.1 mi

↰ Turn left onto Carroll St

0.2 mi

↰ Turn left onto 4th Ave

161 ft

+MEDRITE Urgent Care Park Slope
245 4th Ave, Brooklyn, NY 11215

STOP WORK

In accordance with H&A Stop Work Policy (OP1035), any individual has the right to refuse to do work that they believe to be unsafe and they have the obligation and responsibility to stop others from working in an unsafe manner without fear of retaliation. STOP Work Policy is the stop work policy for all personnel and subcontractors on the Site. When work has been stopped due to an unsafe condition, H&A site management (e.g., Project Manager, Site Safety Manager) and the H&A Senior Project Manager will be notified immediately. Reasons for issuing a stop work order include, but are not limited to:

- The belief/perception that injury to personnel or accident causing significant damage to property or equipment is imminent.
- A H&A subcontractor is in breach of site safety requirements and/or their own site HASP.
- Identifying a sub-standard condition (e.g., severe weather) or activity that creates an unacceptable safety risk as determined by a qualified person.

Work will not resume until the unsafe act has been stopped OR sufficient safety precautions have been taken to remove or mitigate the risk to an acceptable degree. Stop work orders will be documented as part of an on-site stop work log, on daily field reports to include the activity(ies) stopped, the duration, person stopping work, person in-charge of stopped activity(ies), and the corrective action agreed to and/or taken. Once work has been stopped, only the H&A SM or SSO can give the order to resume work. H&A senior management is committed to support anyone who exercises his or her “Stop Work” authority.

TABLE OF CONTENTS

ADMINISTRATIVE INFORMATION

Project Name	558 Sackett Street	**Project Number**	0206384-000
Project Start Date	9/1/2022	**Project End Date**	9/1/2023
Client Site/Contact: Office Phone Number:	Schwimmer, Solomon 646. 580.7790		
H&A Project Manager: Office Phone Number: Cell Phone Number:	Conlon, Mari Cate 646.277.5688 347.271.1521		
H&A Site Safety Officer: Office Phone Number: Cell Phone Number:	PJ DiNardo 412.680.0290		
Subcontractor: Phone: Emergency Phone number:	Eastern Environmental Solutions 631.727.2700 631.774.9821		

APPROVALS: The following signatures constitute approval of this Health & Safety Plan

Electronic Signature

Mari Cate Conlon

Project Manager – Mari Cate Conlon

09-13-2021
Date

This document is valid for a maximum time period of one year after completion. The document must be reviewed if the scope of work or nature of site hazards changes and must be updated as warranted.

PROJECT INFORMATION

Site Overview/History

Site Classification	Occupied	**Site Status**	Occupied commercial uses	**Regulatory Authority**	OSHA

Project Summary

Currently, the Site is vacant and improved with a 2-story, slab-on-grade, brick warehouse/garage building and a 1-story brick warehouse. The Site is located within an urban area characterized by multi-story light industrial, commercial, and residential buildings. The Site is currently owned by Sackett Heights LLC, which is a New York State Domestic Limited Liability Corporation. Sackett Heights LLC plans to develop the Site with a 7-story residential building with a cellar, consistent with current zoning.

Based on a Phase I Environmental Site Assessment (ESA) in May 2022, the Site was first developed as early as the late 1800s in which the Site was divided into three small tax parcels fronting along Sackett Street. Each of the parcels was developed with a low-rise residential or retail building occupying approximately half of their respective parcels, with several small outbuildings also present. By the late 1930s, the eastern parcel was redeveloped with a one-story building occupying the entire parcel footprint and identified as a private garage. By 1950, the center parcel was developed with a two-story building occupying the entire parcel footprint and identified as a private garage. The eastern building was identified as an auto repair shop. The residence on the western lot was demolished in the mid- to late-1960s, with the central and eastern buildings both identified as auto repair shops. Between the early and mid-1980s, the western and central parcels were redeveloped a single two-story building identified as a warehouse. By 1988, this structure was identified as an auto repair shop.

The plan for redevelopment includes a 7-story residential building with 34 residential units of which 9 units will be affordable. The new development is anticipated to include a one level cellar requiring remedial excavations extending to up to approximately 12 feet below ground surface (ft bgs).

Scope of Work: Remedial Investigation

Project Tasks

Task 1	**Task Name:** Ground Penetrating Radar (GPR) Survey Oversight
Oversee private geophysical survey including a GPR survey of the whole site.	
Start Date: 10/2022	End Date: 11/2022
H&A Site Supervisor: PJ DiNardo	Subcontractor: GPRS Inc.
Task 2	**Task Name:** Drilling
Oversee installation of soil borings, permanent groundwater monitoring wells, and temporary soil vapor implants by Eastern Environmental Solutions using a track mounted Geoprobe drilling rig. Eastern Environmental Solutions will provide a one call markout prior to drilling.	
Start Date: 12/2022	End Date: 1/2023
H&A Site Supervisor: PJ DiNardo	Subcontractor: Lakewood Environmental Services Corp.
Task 3	**Task Name:** Soil, Soil Vapor & Groundwater Sampling
Collect soil samples, groundwater samples, and soil vapor samples into laboratory provided containers.	
Start Date: 12/2022	End Date: 1/2023
H&A Site Supervisor: PJ DiNardo	Subcontractor: N/A

HAZARD ASSESSMENT AND CONTROLS

The following site and task specific hazards have been identified. Associated controls have been defined and are also listed below.

Site Chemical Hazards

Potential contaminants of concern at the site include volatile organic compounds (VOCs) and semi volatile organic compounds (SVOCs).

Source of Information: Unknown contaminants/not well characterized, potential for contaminants based on urban fill and site knowledge.

COC	Location/Media	Concentration (Soil)	Concentration (Groundwater)	Units
VOCs	**Soil**	**Unknown**	**Unknown**	**mg/kg**
SVOCs	**Soil**	**Unknown**	**Unknown**	**mg/kg**

VOCs

Hazard Information

VOCs include all organic compounds (substances made up of predominantly carbon and hydrogen) with boiling temperatures in the range of 50-260 degrees C, excluding pesticides. This means that they are likely to be present as a vapor or gas in normal ambient temperatures. Substances which are included in the VOC category include aliphatic hydrocarbons (such as hexane), aldehydes, aromatic hydrocarbons (such as benzene, toluene, and the xylenes or BTEX), and oxygenated compounds (such as acetone and similar ketones). The term VOC often is used in a legal or regulatory context and in such cases the precise definition is a matter of law.

VOCs are released from oil and gasoline refining, storage, and combustion as well as from a wide range of industrial processes. Processes involving fuels, solvents, paints, or the use of chemicals are the most significant sources. VOCs may also be emitted from cleaning products, degreasing products, fabrics, carpets, plastic products, glues, printed material, varnishes, wax, disinfectants, and cosmetics.

Typically, VOCs are present in gas or vapor and will enter the body by breathing contaminated air. Higher concentrations of VOCs may occur in areas of poor ventilation.

Site Hazard Summary

Sun	Slips, Trips, Falls	Urban Fill
Public Right of Way	Cold Temperatures	

SUN

Hazard Information

Acute excessive exposure to solar radiation may cause painful sunburn, and chronic exposure may contribute to eye damage and skin cancer. The average peak intensity of solar ultraviolet (UV) radiation is at midday. Most of the total daily UV is received between 10 AM and 2 PM. UV radiation can reflect off of water, concrete, light colored surfaces, and snow. Cloud cover can reduce UV levels, but overexposure may still occur.

Use the shadow test to determine sun strength: If your shadow is shorter than you are, the sun´s rays are at their peak, and it is important to protect yourself.

Controls

- Wear light-colored, closely woven clothing, which covers as much of the body as practicable.
- Use sunscreens with broad spectrum protection (against both UVA and UVB rays) and sun protection factor (SPF) values of 30 or higher. Ideally, about 1 ounce of sunscreen (about a shot glass or palmful) should be used to cover the arms, legs, neck, and face of the average adult. Sunscreen needs to be reapplied at least every 2 hours to maintain protection.
- Hats should be worn and should be wide brimmed, protecting as much of the face, ears, and neck as possible. Hats should also provide ventilation around the head. Sunscreen should be applied to areas around the head not protected by the hat (ears, lips, neck, etc.).
- Wear sunglasses while working outdoors. Sunglasses should allow no more than 5% of UVA and UVB penetration and must also meet the ANSI Z87.1 standard for safety glasses.
- Use natural or artificial shade, where possible.

URBAN FILL

Hazard Information

Urban Fill consists of historically placed soil materials commonly found in urban areas, and typically comprised of a heterogeneous mixture of granular and fine-grained solids containing various proportions of gravel and cobbles, construction and demolition debris, coal ash, wood ash or other deleterious materials. Urban fill usually contains anthropogenic levels of metals, petroleum hydrocarbons and/or polynuclear aromatic hydrocarbons (PAHs) due to non-point sources and/or which originated prior to placement.

Controls

- Physical Hazards: Urban fill can contain debris such as glass, ceramics, rebar, wire, wood, nails, and other objects that contain sharp edges. Personnel should use caution and wear appropriate gloves (e.g., leather) to prevent cuts associated with handling material containing sharp and abrasive edges.
- Personal Hygiene: Always wash hands prior to and after eating and drinking. Take off work boots prior to getting in your car and going home which will help prevent introducing potentially contaminated soils to your car and home. Wash work clothing separately from non-work clothes to prevent clothing impacted by soil from urban fill to be cross contaminated with other clothing. Use chemical resistant gloves when handling soil to prevent contact with skin.
- Control the dust from urban fill material. Measures should be taken to prevent dust, such as wetting the material or covering the stockpiles.

SLIPS AND TRIPS

Hazard Information

Slip and trip injuries are the most frequent injuries to workers. Both slips and trips result from some kind of unintended or unexpected change in the contact between the foot and the ground or walking surface. This shows that good housekeeping, quality of walking surfaces (flooring), awareness of surroundings, selection of proper footwear, and appropriate pace of walking are critical to preventing fall accidents.

Site workers will be walking on a variety of irregular surfaces that may affect their balance. Extra care must be taken to walk cautiously near any surfaces that are unfamiliar or may have unseen slip or trip hazards such as rivers because the bottom of the riverbed maybe slick and may not be visible. Rocks, gradient changes, sandy bottoms, and debris may be present but not observable.

Controls

- Take your time and pay attention to where you are going.
- Adjust your stride to a pace that is suitable for the walking surface and the tasks you are doing.
- Check the work area to identify hazards - beware of trip hazards such as wet floors, slippery floors, and uneven surfaces or terrain.
- Establish and utilize a pathway free of slip and trip hazards.
- Choose a safer walking route.
- Carry loads you can see over and are not so heavy as to increase your trip/slip probability.
- Keep work areas clean and free of clutter.
- Communicate hazards to on-site personnel and mitigate hazards as appropriate.

PUBLIC RIGHT OF WAY

Hazard Information

H&A staff and their subcontractors conducting work on public roads and/or right of ways can be exposed to vehicular traffic and expose the public to the hazards of the job site. Where a hazard exists to site workers because of traffic or haulage conditions at work sites that encroach public streets or highways, a system of traffic controls in conformance with the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD), or state program, is required. A Temporary Traffic Control Plan (TCP) describes traffic controls to be used for facilitating vehicle and pedestrian traffic through a temporary traffic control zone TCPs are required to provide for worker protection and safe passage of traffic through and around job sites with as little inconvenience and delay as possible.

The plan may range in scope from being very detailed, to merely referencing typical drawings contained in the MUTCD. The degree of detail in the TCP depends entirely on the complexity of the situation, and TCP's should be prepared by persons knowledgeable about the fundamental principles of temporary traffic control and the work activities to be performed.

Controls

H&A Project Managers or their subcontractors need to establish appropriate control measures and obtain any permits when project work is on or encroaches public roadways. You may need flaggers or police details. Cease work and notify the field supervisor immediately if any conditions are such that safety is jeopardized. Utilize protective vehicles whenever appropriate or position equipment so in between the work and oncoming traffic.

HOT TEMPERATURES (HEAT STRESS)

Hazard Information

Heat stress may occur at any time work is being performed at elevated ambient temperatures. Heat stress is one of the most common and potentially serious illnesses associated with outdoor work during hot seasons; therefore, regular monitoring and other preventative measures are vital. Site workers must learn to recognize and treat various forms of heat stress.

H&A employees and their subcontractors should be aware of potential health effects and/or physical hazards of working when there are hot temperatures or a high heat index.
Staff members should consult OP 1015 Heat Stress for additional information regarding hot weather hazards.

Heat Stress Conditions

Heat Rash: Caused by continuous exposure to heat and humid air and aggravated by chafing clothes. Decreases ability to tolerate heat.
Symptoms: Mild red rash, especially in areas of the body on contract with protective gear.
Treatment: Decrease amount of time in protective gear and provide powder to help absorb moisture and decrease chaffing.

Heat Cramps: Caused by perspiration that is not balanced by adequate fluid intake. Heat cramps are often the first sign of a condition that can lead to heat stroke. This condition is much less dangerous than heat stroke, but it nonetheless must be treated.
Symptoms: Acute painful spasms of voluntary muscles (e.g., abdomen and extremities).
Treatment: Remove the victim to a cool area and loosen clothing. Have the patient drink 1 to 2 cups water immediately, and every 20 minutes thereafter until symptoms subside. Total water consumption should be 1 to 2 gallons per day.

Heat Exhaustion: A state of definite weakness or exhaustion caused by the loss of fluids from the body.
Symptoms: Pale, clammy, moist skin, profuse perspiration, and extreme weakness. Body temperature is normal, pulse is weak and rapid, and breathing is shallow. The person may have a headache, may vomit, and may be dizzy.
Treatment: Remove the person to a cool place, loosen clothing, and place in a head-low position. Provide bed rest. Consult physician, especially in severe cases. The normal thirst mechanism is not sensitive enough to ensure body fluid replacement. Have patient drink 1 to 2 cups water immediately and every 20 minutes thereafter until symptoms subside. Total water consumption should be 1 to 2 gallons per day.

Heat Stroke: An acute and dangerous reaction to heat exposure caused by failure of heat regulating mechanisms of the body; the individual´s temperature control system that causes sweating stops working correctly. Body temperature rises so high that brain damage and death will result if the person is not cooled quickly.
Symptoms: Red, hot, dry skin, although person may have been sweating earlier; nausea; dizziness; confusion; extremely high body temperature; rapid respiratory and pulse rate; unconsciousness or coma.
Treatment: Cool the victim quickly and obtain immediate medical assistance. If the body temperature is not brought down fast, permanent brain damage or death may result. Soak the victim in cool but not cold water, sponge the body with rubbing alcohol or cool water, or gently pour water on the body to reduce the temperature to a safe level (102°F). Observe the victim and obtain medical help. Do not give coffee, tea, or alcoholic beverages.

Controls

Practice heat stress management:

- Workers should drink 16 ounces of water before beginning or restarting work after a break. Water should be maintained at 50 to 60 degrees Fahrenheit (°F). Workers should drink one to two 4-ounce cups of water every 30 to 60 minutes during work. The use of alcohol during non-working hours and the intake of caffeine during working hours can lead to an increase in susceptibility to heat stress. Monitor for signs of heat stress (shown in Heat Stress Conditions above).
- Workers should acclimate to site work conditions by slowly increasing workloads (i.e., do not begin site work activities with extremely demanding activities). This acclimation process may require up to two weeks.
- In hot weather, field activities should be conducted in the early morning or evening when temperatures are cooler. Rotate shifts of workers with potential heat stress exposure.
- Adequate shelter should be available to protect personnel from heat, which can decrease physical efficiency and increase the probability of heat stress. Erect temporary shade at the workstation if necessary. A cool area for rest breaks should be designated, preferably air-conditioned.
- Cooling devices should be used to aid natural body ventilation. Note: These devices add weight, and their use should be balanced against worker efficiency.

Task Specific Hazards

TASK 1

Task 1 – GPR Survey Oversight – Ground penetrating radar may require working in congested areas and areas that are hard to access. It is imperative that staff establish communication protocols with the technician prior to the start of work.

Potential Hazards			
Ergonomics	Ground Disturbance	Underground Utilities	Noise

TASK 2

Task 2 – Drilling – Drilling, such as associated with installation of soil borings, monitoring wells, and soil vapor probes is conducted for a range of services. Familiarity with basic drilling safety is an essential component of all drilling projects. Potential hazards related to drilling operations include but are not limited to encountering underground or overhead utilities, traffic, heavy equipment, hoisting heavy tools, steel impacts, open rotation entanglement, and the planned or unexpected encountering of toxic or hazardous substances. While staff members do not operate drilling equipment, they may work in close proximity to operating drilling equipment and may be exposed to many of the same hazards as the subcontractor. It is imperative that staff are aware of emergency stops and establish communication protocols with the drillers prior to the start of work. See OP 1002 Drilling Safety.

Potential Hazards			
Overhead Utilities	Ground Disturbance	Underground Utilities	Noise
Heavy Equipment	Line of Fire	Ergonomics	Generated Waste
Rotating Equipment			

TASK 3

Task 3 – Sampling – Soil sampling by H&A staff can be conducted in conjunction with a wide range activities. These activities can include, but are not limited to: drill spoil characterization and management during building foundation element installation, characterization of excavated soils for management/disposal/reuse during earthwork activities, and as part of environmental remedial activities such as delineation and confirmation sampling. Familiarity with basic heavy construction safety, site conditions (geotechnical and environmental), and potential soil contaminants are essential components of soil sampling performed on active sites. Potential hazards related to soil sampling at construction sites include, but are not limited to: encountering site vehicle traffic and heavy equipment operations, manual lifting, generated waste, contact or exposure to impacted soil, and encountering unknown toxic or hazardous substances. Although soil sampling is commonly

performed within active excavations, from stockpiles, or within trench excavations, sampling locations and situations will vary depending on site conditions. Care should be taken ensuring that the sampling area is not being actively accessed by construction equipment. Care should also be taken with handling of potentially environmentally impacted soil during sampling, with appropriate PPE identified and used. At no time during classification activities are personnel to reach for debris near machinery that is in operation, place any samples in their mouth, or come in contact with the soils without the use of gloves. Staff will have to carry and use a variety of sampling tools, equipment, containers, and potentially heavy sample bags. It is imperative that staff are aware of emergency / communication protocols with the Contractor prior to the start of work.			
Potential Hazards			
Rotating Equipment	Ergonomics	Generated Waste	Line of Fire

Top Task Specific Hazards

Overhead Utilities

When work is undertaken near overhead electrical lines, the distance maintained from those lines shall also meet the minimum distances for electrical hazards as defined in Table 1 below. Note: utilities other than overhead electrical utilities need to be considered when performing work

Table 1 Minimal Radial Clearance Distances *

Normal System Voltage Kilovolts (kV)	Required Minimal Radial Clearance Distance (feet/meters)
0 – 50	10/3.05
51 – 100	12/3.66
101 – 200	15/4.57
201 – 300	20/6.1
301 – 500	25/7.62
501 – 750	35/10.67
750 – 1000	45/13.72

* For those locations where the utility has specified more stringent safe distances, those distances shall be observed.

Controls

- To prevent damage, guy wires shall be visibly marked, and work barriers or spotters provided in those areas where work is being conducted.
    - When working around guy wires, the minimum radial clearance distances for electrical power shall be observed.
- The PM shall research and determine if the local, responsible utility or client has more restrictive requirements than those stated in Table 1.
- If equipment cannot be positioned in accordance with the requirements established in Table 1 the lines need to be de-energized.

Ground Disturbance

Ground disturbance is defined as any activity disturbing the ground. Ground disturbance activities include, but are not limited to, excavating, trenching, drilling (either mechanically or by hand), digging, plowing, grading, tunneling and pounding posts or stakes.

Because of the potential hazards associated with striking an underground utility or structure, the operating procedure for underground utility clearance shall be followed prior to performing any ground disturbance activities.
See OP1020 Working Near Utilities

Controls

Prior to performing ground disturbance activities, the following requirements should be applied:

- Confirm all approvals and agreements (as applicable) either verbal or written have been obtained.

- Request for line location has been registered with the applicable One-Call or Dial Before You Dig organization, when applicable
    - Whenever possible, ground disturbance areas should be adequately marked or staked prior to the utility locators site visit.
- Notification to underground facility operator/owner(s) that may not be associated with any known public notification systems such as the One-Call Program regarding the intent to cause ground disturbance within the search zone.
- Notifications to landowners and/or tenant, where deemed reasonable and practicable.
- Proximity and Common Right of Way Agreements shall be checked, if the line locator information is inconclusive.

Underground Utilities

Various forms of underground/overhead utility lines or conveyance pipes may be encountered during site activities. Prior to the start of intrusive operations, utility clearance is mandated, as well as obtaining authorization from all concerned public utility department offices. Should intrusive operations cause equipment to come into contact with utility lines, the SSO, Project Manager, and Regional H&S Manager shall be notified immediately. Work will be suspended until the client and applicable utility agency is contacted and the appropriate actions for the situation can be addressed.

See OP1020 Work Near Utilities for complete information.

Controls

- Obtain as-built drawings for the areas being investigated from the property owner;
- Visually review each proposed soil boring location with the property owner or knowledgeable site representative;
- Perform a geophysical survey to locate utilities;
- Hire a private line locating firm to determine the location of utility lines that are present at the property;
- Identifying a no-drill or dig zone;
- Hand dig or use vacuum excavation in the proposed ground disturbance locations if insufficient data is unavailable to accurately determine the location of the utility lines.

Noise

Working around heavy equipment (drill rigs, excavators, etc.) often creates excessive noise. The effects of noise can include physical damage to the ear, pain, and temporary and/or permanent hearing loss. Workers can also be startled, annoyed, or distracted by noise during critical activities. Noise monitoring data that indicates that work locations within 25 feet of operating heavy equipment (e.g., drill rigs, earthworking equipment) can result in exposure to hazardous levels of noise (levels greater than 85 dBA).

See OP 1031 Hearing Conservation for additional information.

Controls

- Personnel are required to use hearing protection (earplugs or earmuffs) within 25 feet of any operating piece of heavy equipment.
- Limit the amount of time spent at a noise source.
- Move to a quiet area to gain relief from hazardous noise sources.
- Increase the distance from the noise source to reduce exposure.

Heavy Equipment

Staff members must be careful and alert when working around heavy equipment since equipment failure or breakage and limited visibility can lead to accidents and worker injury. Heavy equipment such as cranes, drills, haul trucks, or others can fail during operation increasing the likelihood of worker injury. Equipment of this nature should be visually inspected and checked for proper working order prior to the commencement of field work. Those that operate heavy equipment must meet all of the requirements to operate heavy equipment. Haley & Aldrich, Inc. staff members that supervise projects or are associated with such high risk projects that involve digging or drilling should use due diligence when working with a construction firm.

See OP1052 Heavy Equipment for additional information.

Controls

- Only approach equipment once you have confirmed contact with the operator (e.g., the operator places the bucket on the ground).
- Maintain visual contact with operators at all times and keep out of the strike zone whenever possible.
- Always be alert to the position of the equipment around you.
- Always approach heavy equipment with an awareness of the swing radius and traffic routes of each piece of equipment and never go beneath a hoisted load.
- Avoid fumes created by heavy equipment exhaust.
- Understand the site traffic pattern and position yourself accordingly.

Line of Fire

Line of fire refers to the path an object will travel. Examples of line of fire typically observed on project sites include lifting/hoisting, lines under tension, objects that can fall or roll, pressurized objects, springs or stored energy, work overhead, vehicles, and heavy equipment.

Controls

The following precautions should be observed for tension and pressure:

- Be aware and stay clear of tensioned lines such as cable, chain, and rope.
- Use only correct gripping devices. Select proper equipment based on size and load limit.
- Be cautious of torque stresses that drilling equipment and truck augers can generate. Equipment can rotate unexpectedly long after applied torque force has been stopped.
- Springs come in a variety of shapes and sizes, and can release tremendous energy if compression as tension is suddenly released.
- Ensure tanks are stored upright and are in good condition, and be aware of potential failures or pressurized lines and fittings
- Items under tension and pressure can release tremendous energy if it is suddenly released.

The following precautions should be observed for objects that can fall or roll:

- Not all objects may be overhead; be especially mindful of top-heavy items and items being transported by forklift or flatbed.
- Secure objects that can roll such as tools, cylinders, and pipes.
- Stay well clear of soil cuttings, soil stockpiles generated during drilling operations and excavations, be aware that chunks of dirt, rocks, and debris can fall or roll.

- Establish a drop zone that is free of any tools and/or debris.

The following precautions should be observed for working in proximity to vehicles and heavy equipment:

- Use parking brakes and wheel chocks for any vehicle or equipment parked on an incline.
- When working near moving, heavy equipment such as line trucks and cranes, remain in operator's full view. Obtain operator's attention prior to approaching equipment.
- Vacate the back of the bucket truck when the boom is being moved or cradled. Get the operator's attention if you must get into the back of the truck so he or she can stop boom movement.

Take precautions for all pedestrian and vehicle traffic when positioning vehicles and equipment at a job site.

Posture/Ergonomics

Most Work-related Musculoskeletal Disorders (WMSDs) are caused by Ergonomic Stressors. Ergonomic Stressors are caused by poor workplace practices and/or insufficient design, which may present ergonomic risk factors. These stressors include, but are not limited to, repetition, force, extreme postures, static postures, quick motions, contact pressure, vibration, and cold temperatures.

WMSDs are injuries to the musculoskeletal system, which involves bones, muscles, tendons, ligaments, and other tissues in the system. Symptoms may include numbness, tightness, tingling, swelling, pain, stiffness, fatigue, and/or redness. WMSD are usually caused by one or more Ergonomic Stressors. There may be individual differences in susceptibility and symptoms among employees performing similar tasks. Any symptoms are to be taken seriously and reported immediately.

Controls

Recommended controls, including Administrative, Work Practice, and/or Engineering Controls, will be put in place based on the interview results and/or after an ergonomic assessment. H&S and/or HP will work with staff members and their staff managers to implement Administrative and Work Practice Controls to control risk associated with ergonomic stressors. In addition, simple Engineering Controls may be implemented, such as use of a keyboard and/or mouse tray, replacing a mouse with a more ergonomic model, and/or changing workstation set up.

Generated Waste

Excess sample solids, decontamination materials, rags, brushes, poly sheeting, etc. that are determined to be free of contamination through field or laboratory screening can usually be disposed into client-approved, on-site trash receptacles. Uncontaminated wash water may be discarded onto the ground surface away from surface water bodies in areas where infiltration can occur. Contaminated materials must be segregated into liquids or solids and drummed separately for off-site disposal.

All wastes generated shall be containerized in an appropriate container (i.e. open or closed top 55-gallon drum, roll-off container, poly tote, cardboard box, etc.) as directed by the PM. Prior to putting waste containers into service, the containers should be inspected for damages or defects. Waste containers should be appropriately labeled indicating the contents, date the container was filled, owner of the material (including address) and any unique identification number, if necessary. Upon completion of filling the waste container, the container should be inspected for leaks and an appropriate seal.

Rotating Equipment

Exposure to rotating parts can occur when working near a drilling rig, or other similar equipment. All rotating parts should be covered with guards to prevent access by workers. When performing maintenance activities that require the rotating parts to be exposed, workers should not allow loose clothing, hands, or tools to approach the rotating parts. Energy isolation procedures must be followed, and guards must be replaced as soon as possible after completing the maintenance task.

Operation of drilling equipment also creates hazards associated with pinch points and rotating equipment. These are hazards where the body and extremities, especially the hands, can be caught in moving equipment and crushed.

Controls

- Evaluate work procedures to avoid placing the body and extremities in the path of rotating equipment and tools to avoid being struck by moving equipment, tools and machinery.
- Evaluate equipment and tool use to identify pinch points and develop procedures to avoid placing body parts in a position where they can be caught in moving equipment, tools and machinery.
- Follow energy isolation procedures if required
- Do not work near rotating equipment with long loose hair, loose clothing or jewelry.

TASK PPE AND SAFETY EQUIPMENT

The personal protective equipment and safety equipment (if listed) is specific to the associated task. The required PPE and equipment listed must be on site during the task being performed. Work shall not commence unless the required PPE is present.

The purpose of PPE is to provide a barrier, which will shield or isolate staff members from the physical, biological, chemical, and/or radiological hazards that may be encountered during task activities.

Required PPE	TASK 1,2	TASK 2
Hard hat	X	X
Safety glasses	X	X
Hard-toed Boots	X	X
Gloves	X	X
Long pants and 4" long sleeve shirt	X	X
Safety vest (Class 2)	X	X
Hearing Protection	X	
Facial Covering	X	X
COVID-19 PPE & Supplies	X	X

TRAINING REQUIREMENTS

The table below lists the training requirements staff must have respective to their assigned tasks and that required to access the site.

Task Specific Training	
Required Training: OSHA 40-hour HAZWOPER, 8-hour HAZWOPER Refresher, On Site training	**Task 1,2, 3**

SITE CONTROL

The overall purpose of site control is to minimize potential contamination of workers, protect the public from the site's hazards, and prevent vandalism. Site control is especially important in emergency situations. The degree of site control necessary depends on site characteristics, site size, and the surrounding community. The following information identifies the elements used to control the activities and movements of people and equipment at the project site.

Communication

Internal

H&A site personnel will communicate with other H&A staff member and/or subcontractors or contractors with:

- Face-to-Face Communication at a minimum of 6ft distance

External

H&S site personnel will use the following means to communicate with off-site personnel or emergency services.

- Cell Phones

Visitors

Project Site

Will visitors be required to check-in prior to accessing the project site?

- Yes
- All Visitors shall be briefed on COVID-19 protocols and PPE. Visitors not briefed, or that do not have the appropriate PPE will be asked to leave the site.

Visitor Access

Authorized visitors that require access to the project site need to be provided with known information with respect to the site operations and hazards as applicable to the purpose of their site visit. Authorized visitors must have the required PPE and appropriate training to access the project site.

Zoning

Work Zone

The work zone will be clearly delineated to ensure that the general public or unauthorized worker access is prevented. The following will be used:

- Flagging tape
- Cones
- Proper Signage

Project Site - Access

Work Hours

The following measure(s) will be used to control site entry and exit during site hours.

- Site is gated and fenced

After Hours
The following measure(s) will be used to control site entry and exit during hours that the site is not operating.

- None

Site Traffic Control
Is the work planned to be conducted on a public roadway or a public right-of-way?

- No

Restrooms
Available nearby restrooms include the following (COVID PPE to be worn and hand sanitization to occur before and after use of facilities)

- BP Gas Station – 164 4th Avenue, Brooklyn, NY 11217

SPILL CONTAINMENT

An evaluation was conducted to determine the potential for hazardous substance spills at this site. This evaluation indicates that there is no potential for a hazardous spill of sufficient size to require containment planning, equipment, and procedures.

DECONTAMINATION

All possible and necessary steps shall be taken to reduce or minimize contact with chemicals and contaminated/impacted materials while performing field activities (e.g., avoid sitting or leaning on, walking through, dragging equipment through or over, tracking, or splashing potential or known contaminated/impacted materials, etc.).

Personal Hygiene Safeguards

The following minimum personal hygiene safeguards shall be adhered to:

1. No smoking or tobacco products on any Hazwoper project.
2. No eating or drinking in the exclusion zone.
3. It is required that personnel present on site wash hands before eating, smoking, taking medication, chewing gum/tobacco, using the restroom, or applying cosmetics and before leaving the site for the day.
4. It is recommended that personnel present on site shower or bathe at home at the end of each day of working on the site.

Personal Decontamination

Outer gloves and boots should be decontaminated periodically as necessary and at the end of the day. Brush off solids with a hard brush and clean with soap and water or other appropriate cleaner whenever possible. Remove inner gloves carefully by turning them inside out during removal. Wash hands and forearms frequently. It is good practice to wear work-designated clothing while on-site which can be removed as soon as possible. Non-disposable overalls and outer work clothing should be bagged onsite prior to laundering. If gross contamination is encountered on-site contact the Project Manager and Regional Health and Safety Manager to discuss proper decontamination procedures.

The steps required for decontamination will depend upon the degree and type of contamination but will generally follow the sequence below.

1. Remove and wipe clean hard hat
2. Rinse boots and gloves of gross contamination
3. Scrub boots and gloves clean
4. Rinse boots and gloves
5. Remove outer boots (if applicable)
6. Remove outer gloves (if applicable)
7. Remove Tyvek coverall (if applicable)
8. Remove respirator, wipe clean and store (if applicable)
9. Remove inner gloves (if out gloves were used)

PPE that is not grossly contaminated can be bagged and disposed in regular trash receptacles

This decontamination procedure is applicable to Task(s): 1

Small Equipment Decontamination

Pretreatment of heavily contaminated equipment may be conducted as necessary:

1. Remove gross contamination using a brush or wiping with a paper towel

2. Soak in a solution of Alconox and water (if possible)
3. Wipe off excess contamination with a paper towel

Standard decontamination procedure:

1. Wash using a solution of Alconox and water
2. Rinse with potable water
3. Rinse with methanol
4. Rinse with distilled/deionized water

Inspect the equipment for any remaining contamination and repeat, as necessary.

This decontamination procedure is applicable to Task(s): 1

Standard Disposal Methods for Contaminated Materials

Excess sample solids, decontamination materials, rags, brushes, poly sheeting, etc. that are determined to be free of contamination through field screening can usually be disposed into client-approved, on-site trash receptacles. Contaminated materials must be segregated into liquids or solids and drummed separately for off-site disposal as defined by and in accordance with applicable regulatory requirements.

Standard Disposal Methods for Contaminated Soils

Contaminated soil cuttings and spoils must be drummed for disposal off-site. Soil cuttings and spoils determined to be free of contamination through field screening can usually be returned to the boreholes or excavations from which they came

EMERGENCY RESPONSE PLAN

Medical

If there is an injury or illness associated with an H&A staff member on the job-site, stop work, stabilize the situation, and secure the site. Assess the severity of the injury or illness to determine the appropriate course of action as listed below.

First Aid Injury

First aid will be addressed using the on-site first aid kit. H&A employees are not required or expected to administer first aid/CPR to any H&A staff member, Contractor, or Civilian personnel at any time and it is H&A´s position that those who do, are doing it on their behalf, and not as a function of their job.

- Injury or illness requiring clinic/hospital visit **WITHOUT** ambulance service

  Injuries or illnesses requiring hospital service without ambulance services include minor lacerations, minor sprains, etc. The following action will be taken:

  - The H&A SSO will ensure prompt transportation of the injured person to the clinic or hospital identified in the safety plan.
  - Another H&A staff member, or contractor on-site, will always drive the injured staff member to the medical facility and remain at the facility until the staff member has been discharged. Staff members will not self-transport to the clinic or hospital.
  - If the injured staff member is able to return to the job site the same day, he/she will bring with him/her a statement from the doctor containing such information as:

- Date
- Employee´s name
- Diagnosis
- Date he/she is able to return to work, regular or light duty

- Date he/she is to return to doctor for follow-up appointment, if necessary
- Signature and address of doctor

Injury or illness requiring a hospital visit **WITH** ambulance service

Injuries or illnesses requiring hospital service with ambulance services include severe head injuries, severe lacerations, heart attacks, heat stroke, etc. The following steps will be taken immediately:

- Call for ambulance service and notify the H&A SSO.
- Comfort the individual until ambulance service arrives.
- While the injured employee is being transported, the H&A SSO will contact the medical facility to be utilized.
- One designated representative will accompany the injured employee to the medical facility and remain at the facility until final diagnosis and other relevant information is obtained.

Notifications

For all injuries or illnesses notify the SSO and PM who in turn will contact Corporate H&S. Within 24 hours the injured staff member or PM will complete the H&S Reporting Form found on HANK. Minor cuts, scratches, and bruises shall also be reported through the H&S Reporting Form. Notify the client in accordance with their notification protocol. Depending on severity, Human Potential will as promptly as possible following an injury or illness, ensure appropriate notification has been made to the family of the individual involved.

Severe Weather

Where the threat of electrical storms and the hazard of lightning exist, staff shall ensure that there is the ability to detect when lightning is in the near vicinity and when there is a potential for lightning and to notify appropriate site personnel of these conditions. The weather forecast will be checked on a daily basis and communicated at the daily safety tailgate meetings.

When lightning is detected or observed the information will be communicated to all crews in the field for appropriate action. Field supervisors will make the decision to stay put or to leave the work site. A location will be identified to marshal field staff in the event that staff are required to leave the job site. A similar decision process will be used during heavy rain events.

Staff shall seek appropriate shelter and not stay in the open.

Evacuation Alarms

Verbal Communication will be used to communicate the evacuation alarm.

Emergency Services

Cellular phone will be used to contact Emergency Services.

Emergency Evacuation Plan

The site evacuation plan is as follows:

1. Establish a designated meeting area to conduct a head count in the event of an emergency evacuation.
2. If the work area is not near an emergency exit, exit via the closest route and meet at the designated meeting area.
3. Notify emergency response personnel (fire, police, and ambulance) of the number of missing or unaccounted for employees and their suspected location.
4. Administer first aid in the meeting area, as necessary.

Under no circumstances should any personnel re-enter the site area without the approval of the corporate H&S manager, the H&S coordinator, and the fire department official in charge.

ROLES AND RESPONSIBILITIES

FIELD SAFETY MANAGER (FSM)

The Haley & Aldrich FSM, Brian Ferguson, is a full-time Haley & Aldrich staff member, trained as a safety and health professional, who is responsible for the interpretation and approval of this Safety Plan. Modifications to this Safety Plan cannot be undertaken by the PM or the SSO without the approval of the FSM.

Specific duties of the FSM include:

- Approving and amending the Safety Plan for this project
- Advising the PM and SSOs on matters relating to health and safety
- Recommending appropriate personal protective equipment (PPE) and air monitoring instrumentation
- Maintaining regular contact with the PM and SSO to evaluate the conditions at the property and new information which might require modifications to the HASP and
- Reviewing and approving JSAs developed for the site-specific hazards.

PROJECT MANAGER (PM)

The Haley & Aldrich PM, Mari Cate Conlon, is responsible for ensuring that the requirements of this HASP are implemented at that project location. Some of the PM´s specific responsibilities include:

- Assuring that all personnel to whom this HASP applies have received a copy of it;
- Providing the RHSM with updated information regarding environmental conditions at the site and the scope of site work;
- Providing adequate authority and resources to the on-site SSO to allow for the successful implementation of all necessary safety procedures;
- Supporting the decisions made by the SSO;
- Maintaining regular communications with the SSO and, if necessary, the FSM;
- Coordinating the activities of all subcontractors and ensuring that they are aware of the pertinent health and safety requirements for this project;
- Providing project scheduling and planning activities; and
- Providing guidance to field personnel in the development of appropriate Job Safety Analysis (JSA) relative to the site conditions and hazard assessment.

SITE SAFETY OFFICER

The SSO, Zach Simmel, is responsible for field implementation of this HASP and enforcement of safety rules and regulations. SSO functions may include some or all:

- Act as H&A´s liaison for health and safety issues with client, staff, subcontractors, and agencies.
- Verify that utility clearance has been performed by H&A subcontractors.
- Oversee day-to-day implementation of the Safety Plan by H&A personnel on site.
- Interact with subcontractor project personnel on health and safety matters.
- Verify use of required PPE as outlined in the safety plan.
- Inspect and maintain H&A safety equipment, including calibration of air monitoring instrumentation used by H&A.

- Perform changes to HASP and document as needed and notify appropriate persons of changes.
- Investigate and report on-site accidents and incidents involving H&A and its subcontractors.
- Verify that site personnel are familiar with site safety requirements (e.g., the hospital route and emergency contact numbers).
- Report accidents, injuries, and near misses to the H&A PM and Field Safety Manager (FSM) as needed.

The SSO will conduct initial site safety orientations with site personnel (including subcontractors) and conduct toolbox and safety meetings thereafter with H&A employees and H&A subcontractors at regular intervals and in accordance with H&A policy and contractual obligations. The SSO will track the attendance of site personnel at H&A orientations, toolbox talks, and safety meetings.

FIELD PERSONNEL

Haley & Aldrich personnel are responsible for following the health and safety procedures specified in this HASP and for performing their work in a safe and responsible manner. Some of the specific responsibilities of the field personnel are as follows:

- Reading the HASP in its entirety prior to the start of on-site work;
- Submitting a completed Safety Plan Acceptance Form and documentation of medical surveillance and training to the SSO prior to the start of work;
- Attending the pre-entry briefing prior to beginning on-site work;
- Bringing forth any questions or concerns regarding the content of the Safety Plan to the PM or the SSO prior to the start of work;
- Stopping work when it is not believed it can be performed safely;
- Reporting all accidents, injuries and illnesses, regardless of their severity, to the SSO;
- Complying with the requirements of this safety plan and the requests of the SSO; and
- Reviewing the established JSAs for the site-specific hazards on a daily basis and prior to each shift change, if applicable.

VISITORS

Authorized visitors (e.g., Client Representatives, Regulators, Haley & Aldrich management staff, etc.) requiring entry to any work location on the site will be briefed by the Site Supervisor on the hazards present at that location. Visitors will be escorted at all times at the work location and will be responsible for compliance with their employer´s health and safety policies. In addition, this safety plan specifies the minimum acceptable qualifications, training and personal protective equipment which are required for entry to any controlled work area; visitors must comply with these requirements at all times. Unauthorized visitors, and visitors not meeting the specified qualifications, will not be permitted within established controlled work areas.

HEALTH & SAFETY PLAN ACKNOWLEDGEMENT FORM

Note: Only H&A employees sign this page.

I hereby acknowledge receipt and briefing on this Health & Safety Plan prior to the start of on-site work and declare that I understand and agree to follow the provisions and procedures set forth herein while working on this site.

PRINTED NAME	SIGNATURE	DATE

APPENDICES

Appendix A – Job Hazard Analyses

APPENDIX A
JOB SAFETY ANAYLSES

Safety
in everything we do

FORMER MILL SANITARY WIPING SITE
558 SACKETT STREET, BROOKLYN, NY

KEY TASK 1-3**:** Remedial Investigation

Subtask Category	Potential Hazards	Controls
Ground Penetrating Radar	Utility Locators and Underground Hazards	• GPR will be conducted to evaluate potential private underground utilities.
	Slips, trips, and falls	• Keep work area clean and clear of obstructions. Make sure adequate lighting is provided while working indoors.
Drilling	Noise reduction	• Wear hearing protection while drilling in progress.
Drilling	Heavy equipment	• Maintain safe distance from equipment. Equipment only to be operated by those authorized and trained.
Drilling	Utility locators and underground hazards	• Dig Safely New York will be contacted to mark public underground utilities as well as a GPR survey of the Site prior to intrusive activities.
Drilling	Slips, trips, and falls	• Keep work area clean and clear of obstructions. Make sure adequate lighting is provided while working indoors.
Drilling	General site hazards	• Safety tailgates will be held at the start of each day to discuss general and site specific hazards encountered throughout the project.
Soil vapor, soil and groundwater sampling	General site hazards	• Safety tailgates will be held at the start of each day to discuss general and site specific hazards encountered throughout the project.

Soil vapor, soil and groundwater sampling	Slips, trips, and falls	• Keep work area clean and clear of obstructions. Make sure adequate lighting is provided while working indoors.
Soil vapor, soil and groundwater sampling	Other	• Interaction with generated waste to be mitigated by wearing of external Personal Protection Equipment including nitrile gloves, eye protection and long sleeve pants and shirts.

APPENDIX F

NYSDOH Generic Community Air Monitoring Plan

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

Overview

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

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

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

Community Air Monitoring Plan

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

> **Continuous monitoring** will be required for all <u>ground intrusive</u> activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.
>
> **Periodic monitoring** for VOCs will be required during <u>non-intrusive</u> activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. "Periodic" monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

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

VOC Monitoring, Response Levels, and Actions

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

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

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

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

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

Particulate Monitoring, Response Levels, and Actions

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

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

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

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

December 2009

Appendix 1B
Fugitive Dust and Particulate Monitoring

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

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX G
Field Descriptions of Samples for Former Manufactured Gas Plant (MGP) Sites

Field Descriptions of Samples for Former Manufactured Gas Plant (MGP) Sites

SOIL SAMPLE DESCRIPTIONS

It is important that descriptive qualifiers are consistently used to characterize degree and nature of contaminant impacts and visual-manual soil classification. The following presents some examples of descriptive qualifiers.

SOIL LOGGING

- All soils are to be logged using the **Unified Soil Classification** (ASTM D 2488 field descriptions)

- **PID or FID** used to screen all soil samples (Jar Headspace method) – maximum readings should be recorded and included on the logs. The PID/FID should be calibrated daily at a minimum

- **Moisture terms** are: Dry, Moist, and Wet

- **Color terms** - use geotechnical color charts - colors may be combined: e.g. red-brown. Color terms should be used to describe the "natural color" of the sample as opposed to staining caused by contamination (see below)

- **Log of each sample interval** should be prepared as follows:

[Coarse Grained Example] NARROWLY GRADED SAND (SP); mostly fine sand; <5% fines; red-brown, moist, environmental/depositional/geologic descriptions.

[Fine Grained Example] SANDY SILT (ML); heterogeneous till structure, nonplastic, ~30% fine to coarse, subangular sand; ~10% subangular fine gravel, max. size ~ 10 mm; brown; environmental/depositional/geologic descriptions.

- **Representativeness –** Soil logs should include particular notes if the field representative believes that there is a possibility that the soil sample being described is not representative of the interval sampled.

- **Intervals for Description –** if using a 2' (split spoon) or 4' (Macro-core) long sampler – the field description should not necessarily be for the entire sample interval. It is important to look for, identify, and describe small-scale units and changes within each sample interval.

DESCRIPTION OF CONTAMINANTS

Visible Contamination Descriptors

- **Sheen** - iridescent petroleum-like sheen. Not to be used to describe a “bacterial sheen”, which can be distinguished by its tendency to break up on the water surface at angles, whereas a petroleum sheen will be continuous and will not break up. A field test for sheen is to put a soil sample in a jar of water and shake the sample (jar shake test) , then observe the presence/absence of sheen on the surface of the water in the jar.

- **Stained** - used w/ color (i.e. black or brown stained) to indicate that the soil matrix is stained a color other than the natural (unimpacted) color of the soil.

- **Coated** - soil grains are coated with tar/free product – there is not sufficient free-phase material present to saturate the pore spaces. The degree of coating should be described as light, moderate, or heavy.

- **Blebs** - observed discrete sphericals of tar/free product - but for the most part the soil matrix was not visibly contaminated or saturated. Typically this is residual product. The estimated size and number of blebs should be reported.

- **Saturated** - the entirety of the pore space for a sample is saturated with the tar/free product. Care should be taken to ensure that you’re not observing water saturating the pore spaces if you use this term. Depending on viscosity, tar/free-phase saturated materials may freely drain from a soil sample.

- **Oil** - Used to characterize free and/or residual product that exhibits a distinct fuel oil or diesel fuel like odor; distinctly different from MGP-related odors/impacts.

- **Tar** - Used to describe free and/or residual product that exhibits a distinct “coal tar” type odor (e.g. naphthalene-like odor). Colors of product can be brown, black, reddish-brown, or gold.

- **Solid Tar** - Used to describe product that is solid or semi-solid phase. The magnitude of the observed solid tar should be described (e.g. discrete granules or a solid layer).

- **Purifier Material** - Purifier material is commonly brown/rust or blue/green wood chips or granular material. It is typically associated with a distinctive sulfur-like odor. Other colors may be present.

Olfactory Descriptors

- Use terms such as “ tar-like odor” or “naphthalene-like odor” or “fuel oil-like odor” that provide a qualitative description (opinion) as to the possible source of the odor.

- Use modifiers such as strong, moderate, faint to indicate intensity of the observed odor.

DNAPL/LNAPL

- A jar shake test should be performed to identify and determine whether observed tar/free phase product is either denser or lighter than water. In addition, MGP residues can include both light and dense phases - this test can help determine if both light and dense phase materials are present at a particular location.

Viscosity of Free-Phase Product – If free-phase product/tar is present a qualitative description of viscosity should be made. Use descriptors such as:

- Highly viscous (e.g. taffy-like)
- Viscous (e.g. No. 6 fuel oil or bunker crude like)
- Low viscosity (e.g. No. 2 fuel oil like)

GROUNDWATER SAMPLING OBSERVATIONS

- Any observations of sheen, blebs, free-phase product/tar, staining or coating of the sampling equipment, odor, etc. that made during sampling of groundwater are to be included in the groundwater sample collection log.

Standard Colors for Reporting MGP Impacts

		RGB Color	Auto Cad Index
🟥	**TAR SATURATED**	255,0,0	10
🟪	**COATED MATERIAL, LENSES**	255,0,255	210
🟫	**HARDENED TAR**	129,64,0	34
🟧	**BLEBS, GLOBS, SHEEN**	255,191,0	40
🟨	**STAINING, ODOR**	255,255,0	50
🟦	**PETROLEUM IMPACTS SATURATION & SHEENS**	0,191,255	140
🟦	**PETROLEUM IMPACTS STAINING & ODORS**	170,234,255	141
🟦	**PURIFIER WASTE AND ODOR**	0,0,255	170
🟩	**NO OBSERVED IMPACTS**	0,165,0	92

GUIDELINES ON INSTALLATION OF OVERBURDEN WELLS (MONITORING WELLS) FOR ENVIRONMENTAL INVESTIGATIONS

Contents

Introduction:

The New York State Department of Environmental Conservation Division of Environmental Remediation (the Department) utilizes the US EPA *Design and Installation of Monitoring Wells Guidance* and ASTM D5092, *Standard Practice for Design and Installation of Groundwater Monitoring Wells*, as standards for the design and installation of overburden monitoring wells (monitoring wells) for remedial investigations. Using these documents as a basis, the Department has developed the following which serves to standardize the design and construction of monitoring wells so that the environmental data and samples that are collected accurately represent the actual site conditions and can be relied upon when evaluating nature and extent of groundwater contamination and remedial alternatives.

This document does not address other types of wells or shallow groundwater conditions and may not be appropriate for various site-specific conditions or applications. For these other types of groundwater monitoring wells, the Department Project Manager (PM) will require a detailed site-specific plan be submitted in writing for review.

Purpose and Scope:

The purpose of this document is to provide standard construction requirements for the design and installation of groundwater monitoring wells installed during investigations performed pursuant subject to 6-NYCRR Part 375 and conducted under Department's Spills Program. This document is based on, and in general conformance with, US EPA Design and Installation of Monitoring Wells Guidance and ASTM D5092, Standard Practice for Design and Installation of Groundwater Monitoring Wells. The Department's standardization of monitoring well design and construction installation will:

1) Improve environmental work plan consistency throughout the regulated community;
2) Standardize and streamline the remedial investigation work plan process;
3) Limit the threat of contamination migration and surficial infiltration;
4) Improve the accuracy and precision of groundwater quality sample results; and
5) Provide a fixed monitoring points to ensure groundwater elevations can be accurately gauged with a high degree of reliability.

This document does not address the collection of borehole logging data, soil classification, screen interval placement, soil sampling procedures, drilling health and safety, decontamination, nor monitoring well decommissioning. NYSDEC's DER-10 Guidance and Commissioner's Policy 43 provide information relative to these activities.

Applicability:

Monitoring wells are utilized to access and observe groundwater conditions in the saturated water-bearing zone in unconsolidated material beneath the ground surface, in a specific location, at a known elevation, and over extended periods of time. Data collected from monitoring wells routinely includes the elevation of the water table, water quality parameter measurements, and representative groundwater samples for contaminant analysis. Monitoring wells are often accessed repeatedly throughout the course of an environmental project to obtain data to develop statistical trends and monitor the groundwater.

The following is a partial list of applications for the installation of groundwater monitoring wells in which this document applies:

- Site characterization;
- Remedial investigations;
- Determining the groundwater elevations;
- Determining the presence of non-aqueous phase liquid (NAPL);
- Long-term groundwater elevations and quality monitoring;
- Groundwater protection decision making; and
- Post-remedial Site Management groundwater monitoring.

This document does not apply to the following uses:

- Temporary wells;
- Pre-packed sand pack wells;
- Bedrock investigations;
- Groundwater less than five feet below the ground surface;
- Groundwater sample collection where the static head is above the well screen;

- Multi-cased wells;
- Dense non-aqueous phase liquid (DNAPL) gauging;
- NAPL or groundwater recovery;
- Multi-cased wells;
- Pump tests, bail-down tests, groundwater extraction, or construction dewatering;
- Chemical or biological injections points; and

For the above listed uses, designs shall be in conformance with industry standards and with consultation with the Department Project Manager (PM).

Drilling Considerations:

Several drilling methods are routinely employed in the installation of groundwater monitoring wells for various site conditions; therefore, the method of drilling the borehole will be proposed by the qualified environmental professional and approved by the Department's site PM. A qualified environmental professional, as recognized in New York State Department of Environmental Conservation (NYSDEC) DER-10, can be a: 1) Professional Engineer (PE) 2) Professional Geologist, or 3) recognized Qualified Environmental Professional (QEP) as defined in NYCRR-375-1.2(ak).

The chosen drilling method must produce a borehole sufficient in diameter to allow for the construction of the permanent groundwater monitoring well including a minimum annular space of two inches around the entire monitoring well circumference. For example, installation of a 2-inch monitoring well would require a minimum 6 3/8-inch borehole. The borehole diameter may be increased by the qualified environmental professional based on predicted, observed, or known subsurface soil characteristics (e.g., fine-grained soil) and need for a larger sand pack without approval by the Department.

Vertical over-drilling the borehole will be required to allow for the installation of an approximately six-inch thick sand pack that extends beneath the bottom of the monitoring well screen.

Monitoring well installation procedures may require changes during field activities due to unforeseen subsurface conditions. Deviations from the approved work plan must be discussed with the Department's PM/field representative prior to implementation and must be documented in monitoring well construction logs, boring logs, daily field logs, and in the final report.

Figures 1 and 2 depict typical construction details for flush mounted and stick-up type monitoring wells.

Screen and Casing Pipe:

The inside diameter of the monitoring well screen and riser pipe must be either two-inches or four-inches in diameter and installed straight and plumb to allow for the insertion of equipment for gauging, monitoring, and sampling. It may be necessary to install well centralizers on the screen and riser pipe to ensure a uniform filter pack. A permanent mark will be placed on the north side of the casing as a reference point for horizontal and vertical control and for groundwater measurements. Monitoring well construction materials must be comprised of either schedule 40 PVC, schedule 80 PVC, or stainless steel. Materials must be free of contaminants prior to installation. All joints are to be secured by flush-jointed threads. All caps and end plugs must be secured by either flush or jointed threads. If there is no information regarding the formation in which the well is to be installed, the monitoring well screen slot size shall be factory manufactured and 0.010-inches, unless approved by the Department PM.

Occasionally, during the extraction of the drilling equipment from the borehole, the monitoring well casing may be unintentionally drawn up within the borehole. If this occurs, the groundwater monitoring well should not be forced or driven back into the borehole. Instead, if conditions warrant, the qualified environmental professional may elect to shorten the length of the riser, or the borehole can be re-drilled and the well reset. If the original borehole needs to be abandoned, the abandonment will be in accordance with NYSDEC Commissioners Policy (CP) -43 *Groundwater Monitoring Well Decommissioning Policy,* and a replacement borehole drilled in a different location with approval from the Department's PM.

For monitoring wells designed to intersect the groundwater interface, the top of the monitoring well screen should be installed approximately two to three feet above the observed water table to account for seasonal fluctuations of the water table elevation. The maximum screen length shall be 15 feet and should not penetrate a lower aquitard. The qualified environmental professional will determine the lengths of monitoring well screen and riser along with the placement of the sand filter pack and bentonite seal in the field based on the observed groundwater elevation.

Sand Filter Pack:

A sand filter pack (aka filter pack) will be placed in the annular space around the monitoring well screen to perform as a filter between the formation material and the monitoring well screen. The sand filter pack must be compatible with the screen size; therefore, in the context of this document, the filter pack material must be:

- inert silica sand that is compatible with the formation material;
- has been manufactured as a filter sand; and
- has been certified as chemically clean by the manufacturer.

Prior to installing the monitoring well screen, an approximately six-inch thick bedding layer of sand must be installed in the bottom of the borehole. The annular space will allow for the uniform deposition of monitoring well materials around the screen and riser and for the passage of tremie pipes and monitoring well materials. The sand filter pack must fill the entire annular space over the entire length of the monitoring well screen and extend a minimum of 2-ft above the top of the monitoring well screen. The sand filter pack shall not extend higher than 5-ft below ground surface (bgs) to allow space for placement of the bentonite seal and protective casing.

A larger borehole with a wider sand pack should be considered if high levels of turbidity are expected that may result in the collection of groundwater samples that are not representative of dissolved conditions (i.e., inaccurately elevated metals and semi-volatile concentrations). The Department will allow the qualified environmental professional to advance a larger borehole without review or comment.

At sites where known or suspected contaminants are not compatible with PVC, or where NAPL may not pass through 0.010-inch slotted screen, the qualified environmental professional must consult the Department PM regarding the construction details of the monitoring well and provide proposed alternatives in a work plan for review and approval.

It may be advantageous to place a 6-inch layer of fine-grained sand above the filter pack prior to installing the bentonite seal. This layer improves the seal and prevents the bentonite from migrating into the filter pack well screen zone.

Bentonite Seal:

A bentonite seal will be placed immediately above the sand filter pack. The bentonite seal must be composed of commercially available pellets, granules, or chips and must be a minimum of 2-ft measured immediately after placement, without allowance for swelling. Following placement of the bentonite pellets or chips, water from a public water supply source or a potable private water supply, which has been verified to meet public water supplier standards/maximum contaminant levels for Per- and polyfluoroalkyl substances (PFAS), shall be poured into the annular space to hydrate the bentonite. The bentonite seal shall not be placed higher than 2-ft bgs to allow space for placement of the protective casing with cement or cement-bentonite grout. A minimum of eight hours or the manufacturer's recommended hydration time, whichever is longer, should be allotted for the hydration of the bentonite after placement in the borehole and before the remaining annular space is sealed.

Remaining Annular Space Above the Bentonite Seal:

The annular space above the bentonite seal must be sealed from surface infiltration with a cement-bentonite mixture. On certain occasions when there is 10 or more linear feet of remaining annular space to be sealed, or when the qualified environmental professional determines it is appropriate, a tremie pipe shall be used to install the cement-bentonite mixture. In these instances, installation shall start with the tremie pipe initially located within 1-ft above the top of the bentonite seal. To ensure proper gelling and low permeability, the bentonite grout must have a minimum density of 10 lbs./gallon of water. Water must be from a public water supply source or a potable private water supply, which has been verified to meet public water supplier standards/maximum contaminant levels for Per- and polyfluoroalkyl substances (PFAS). The tremie pipe shall be placed in the annulus between the drilling equipment or temporary steel casing and the riser pipe. Drill casing shall be removed from the borehole as the annular seal is installed to ensure the borehole remains stable. The grout shall be pumped through the tremie pipe to the bottom of the open annulus until a continuous, undiluted column of grout is formed from the bentonite seal to the frost line below the ground surface.

Alternatively, soil cuttings collected during the borehole advancement may be reused to fill the annular space from the top of the bentonite seal to the surface seal provided that the cuttings both: 1) exhibit no detectable photoionization detector (PID) measurements, and 2) are free of grossly contaminated material per NYCRR-375-1.2(u).

Concrete Surface Seal (Pad) and Outer Protective Casing:

At the time the surface seal is installed, a protective steel casing that is at least two-inches larger than the diameter of the monitoring well riser casing shall be installed. The protective casing must also be installed with adequate vertical space to allow for a locking well plug. A concrete surface seal (concrete pad) must then be installed around each monitoring well. Concrete shall be placed in the borehole (on top of the grout) to form a contiguous unit. The design must take into consideration pedestrian and/or vehicular traffic and must be sufficient to last the entire life cycle of the project. For two-inch or four-inch diameter monitoring wells, the Department will require a monitoring well pad that shall be 2-ft X 2-ft X 6-inches. The finished pad will be slightly sloped away from the protective steel casing to reduce the potential for surface water infiltration. In addition, the concrete must meet or exceed the minimum compressive strength required of the surrounding sidewalk flags as per local codes and permits.

The protective steel casing can be either flush mounted or a stick-up design. Flush mounted protective casings will have lids that are bolted in place while stick-up casings will have locking lids. Bollards will be emplaced to protect against damage, as needed. If the protective casing is flush mounted, a layer of sand should be installed across the bottom of the casing to allow water to drain from around the riser pipe. For stick-up design casings, a small hole should be drilled in the side of the pipe to enable accumulated water to drain. The diameter of the hole should be small enough to discourage wasps from entering.

The materials used in the construction of the seal will be of sufficient quality that the longevity of the concrete and outer protective casing will surpass the likely duration of the project. In instances where these items fail, the Department will require repair or replacement of the monitoring well pad and outer seal for public safety and monitoring well integrity.

Locking Well Plug:

All groundwater monitoring wells shall have chemical resistant gripper plugs that effectively seal the monitoring well by creating a watertight seal. Each well plug shall be outfitted with a lock that prohibits unauthorized access to the monitoring well. The lock shall be in kept good working condition.

Well Development:

Monitoring wells will be developed after the grout seal has sufficiently cured to remove water which may have been introduced during the drilling process and to ensure the collection of representative groundwater samples and water level measurements. Groundwater monitoring wells must be developed in accordance with ASTM D5521. Groundwater monitoring wells shall be developed until the monitoring well has reached equilibrium and turbidity of the purge water is measured to 50 nephelometric turbidity units (NTUs) or less.

(FIGURES ATTACHED)

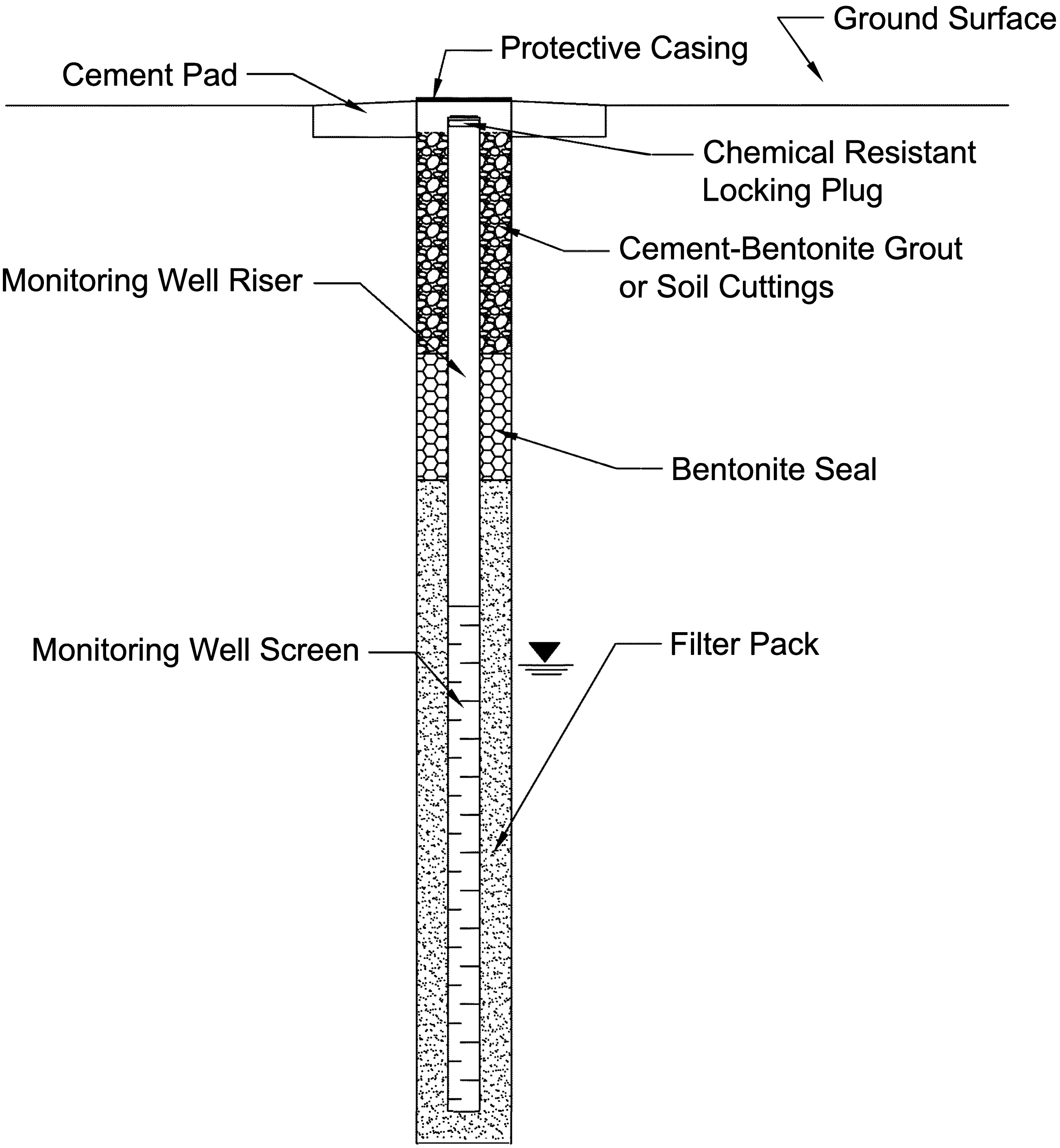


Figure 1: Flush Mounted Monitoring Well

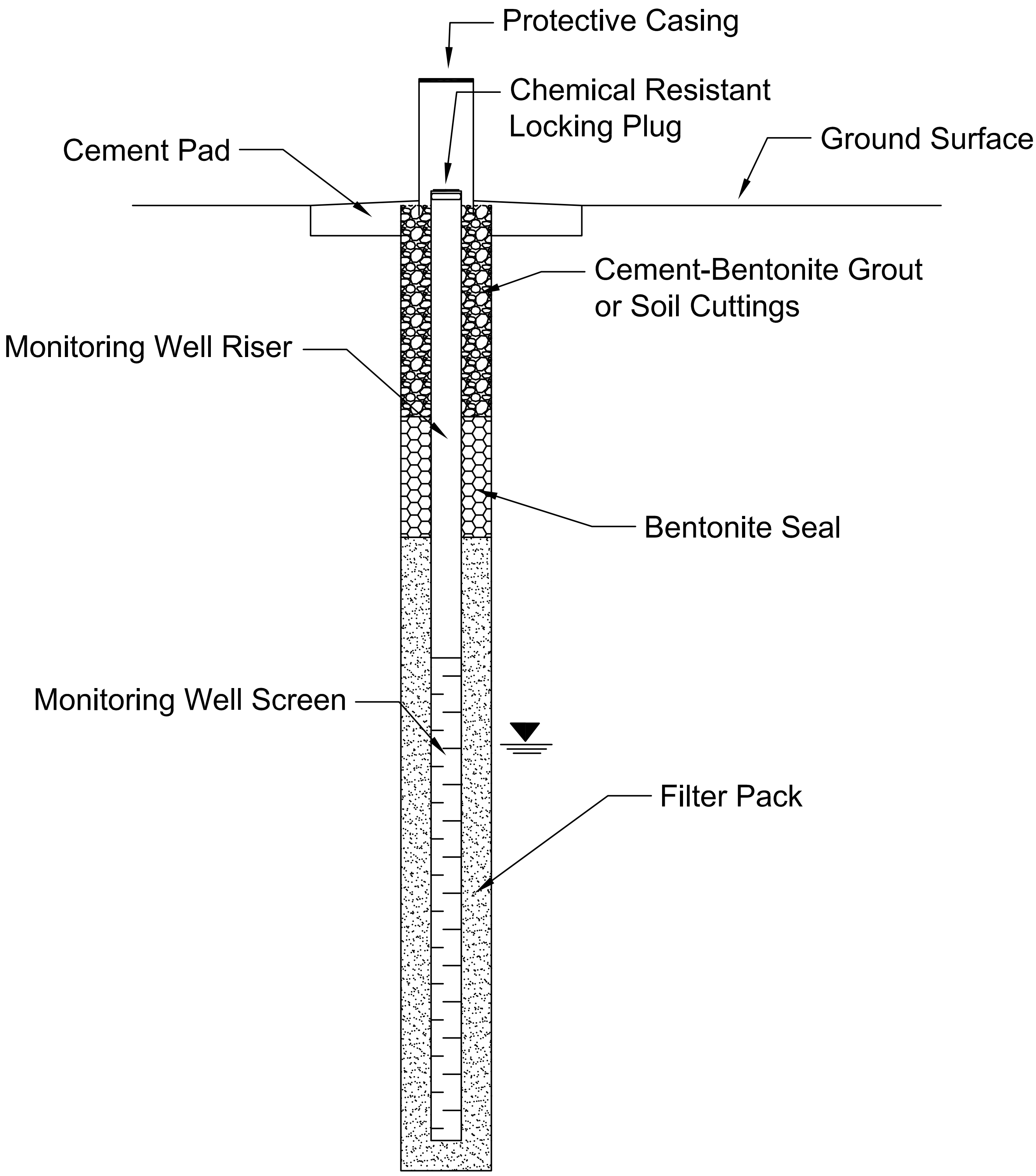


Figure 2: Stick-up Monitoring Well