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Section 5 Site Investigation Techniques

I. INTRODUCTION

Consistent and appropriate site investigation techniques must be used to ensure that accurate, reliable, and representative data are collected during the site assessment process. The following guidance is provided to establish standardized methods and procedures for the investigation, testing, and interpretation of geology, hydrogeology, and contaminant mobility. This section is not intended to duplicate well-established methods and procedures, but to establish minimum standards for proper investigation techniques at a contaminated site.

The investigation techniques include soil and rock sampling, soil vapor sampling, direct measurement of vapor flux, groundwater sampling, laboratory analysis, and stockpile sampling. Additional guidance on standard field and laboratory methods can also be found in many textbooks, government agency documents, and professional society publications. A list of references for various topics is provided in Appendix I.II.

II. BORING AND WELL PERMITS

Permits are required for all groundwater, vadose wells, cathotic protection wells, and for many exploratory borings (San Diego County Code, Title 6, Division 4). Standards for well construction, destruction, reconstruction, or repair are as stated in California Department of Water Resources Bulletins 74-81 and 74-90. More specific boring and well construction standards are presented in Appendix B.IV. An explanation of permit requirements is provided below. Completed permit applications must be submitted to the San Diego County Department of Environmental Health (DEH), and approval must be received before drilling can begin.

In San Diego County, a well includes:

- Community supply wells,
- Individual domestic wells,
- Commercial supply wells,
- Industrial supply wells,
- Agricultural supply wells,
- Cathodic protection wells,
- Groundwater monitoring wells (observation wells and piezometers),
- Groundwater remediation wells,

- Vadose monitoring wells, (vapor wells, gas monitoring wells, vapor probes),
- Vapor extraction/inlet wells, and
- Borings (test holes, auger holes, driven test holes, cone penetrometer test holes, Site Characterization and Analysis Penetrometer System [SCAPS] test holes, geotechnical borings, etc.).

A. Permit Requirements

1. Groundwater, Vadose, and Cathodic Protection Wells

Well permits are required for any groundwater, vadose, or cathodic protection well installation regardless of how the well is installed. Information on the construction and destruction methods and specific permitting requirements for cathodic protection wells can be found on the San Diego County website at the Monitoring Well Program page (http://www.co.san-diego.ca.us/deh/lwg/sam/monitoring well program.htm).

2. Exploratory or Test Borings and Geotechnical Borings

Well permits are required on all sites for:

- Any boring in which a casing will be installed
- Any boring that has a monitoring device installed
- Any soil boring greater than 20 feet in depth
- Any soil boring, 20 feet or less in depth, where the groundwater table is anticipated to be encountered

In areas where hazardous waste or hazardous materials have not been stored, are not now stored, are not proposed to be stored; or where soil and groundwater contamination is not known or suspected, a permit may be waived after review by DEH. For this determination submit a detailed site map and a description of the proposed work to assist in the evaluation.

3. Well Destruction

Well permits are required for destruction of any groundwater, vadose, or cathodic protection well.

4. Well Reconstruction

Well permits are required for reconstruction of any groundwater, vadose, or cathodic protection well. Minor modifications may be completed without a permit but must be approved by DEH before work is begun.

B. Permit Application

Submit three (3) copies of a complete "Permit Application for Groundwater and Vadose Monitoring Wells and Exploratory or Test Borings" (well/boring application), detailed site plan, additional supporting documents (if required), and the appropriate fees. A copy of the well/boring application is available in Appendix B.II. DEH will not process the application until all fees are submitted. At least one of the application copies must have original signatures of

both the driller and the Registered Geologist (RG), Registered Civil Engineer (RCE), Certified Engineering Geologist (CEG), or Certified Hydrogeologist (CHG). Please allow seven to ten (7 to 10) working days for processing and review.

If an incomplete application is submitted, the permit will be disapproved and returned to the applicant for correction and resubmittal. A time frame will be established for modifying the application for resubmission.

The contact person indicated on the well/boring application will be notified when the application is approved or disapproved. At that time arrangements will be made to have the permit picked up at the DEH office or mailed to the address indicated on the application.

1. Application

Complete the "Permit Application for Groundwater and Vadose Monitoring Wells and Exploratory or Test Borings." The following information must be included on the application.

- a. Assessor's parcel number (APN)
- b. Current property owner
- c. C57 driller's name doing work (All work must be done by a properly licensed and bonded contractor.)
- d. Registered Geologist or Civil Engineer on project
- e. Number of wells (or borings) to be constructed
- f. Well type
- g. Drilling method
- h. Proposed materials to be used
- i. Proposed well construction
- j. Driller's signature (must have original signature)
- k. Original signature of Registered Geologist (RG), Registered Civil Engineer (RCE), Certified Engineering Geologist (CEG), or Certified Hydrogeologist (CHG)
- 1. Evidence of a \$2,500 bond, posted with the San Diego County Department of Environmental Health
- m. Detailed site plan (drawn to scale) showing the location of the proposed well(s) and/or boring(s) and the location of existing wells. The plan must show the location of existing improvements, such as structures, underground storage tanks (USTs), and underground utilities. An adequate vicinity map is also required to show the site location in relation to the surrounding area.
- n. Supporting documents that may be required, such as Traffic Control Permit, Encroachment/Excavation Permit, and/or Property Owner Responsibility Agreement

2. Fees

To be accepted by DEH, a well/boring application must be submitted with the appropriate fees. The current permit fees are detailed on page three of the application that is provided in Appendix B.

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3. Refund of Permit Fees

If you did not complete the original scope of work for the permit issued, submit a written request to the monitoring well permit desk for a refund of the appropriate portion of the unused fees. Your request must be received within 30 days of the expiration date of the permit. A fee will be deducted from the refund to cover the processing and the technical review of the permit.

4. Permit Extensions

A permit may be extended for an additional 120 days. Submit a written request for an extension to the well permitting desk within 30 days of the expiration date, along with a \$45 fee. The maximum term of a permit cannot exceed one (1) year.

C. Inspections

1. Drilling Inspections

DEH must be given 48 hours notice prior to commencement of drilling activity. This allows DEH staff to schedule random on-site drilling inspections. These inspections are to observe field activities and to ensure that all work is being completed in compliance with the current local and state requirements.

2. Well Completion Inspections

- a. DEH staff will perform inspections of all sites that have groundwater, vadose, or cathodic protection wells, or where these wells have been destroyed, to determine if the wells were completed in accordance with current local and state standards and to observe the long-term maintenance of the well(s) and site.
- b. Official Notices will be issued when it is observed that monitoring wells or cathodic protection wells are not being maintained and/or they present a potential public health hazard or environmental hazard.

3. Re-inspections

While inspecting drilling sites, DEH staff may discover that the scheduled drilling operations were cancelled. If the DEH well permitting clerk has not been properly notified of a drilling cancellation, and staff completes an inspection, a \$75.00 re-inspection fee will be required. Contact the well permitting clerk at (619) 338-2339 for any drilling activity, including cancellations.

No additional fees are charged when an Official Notice has been issued and, upon reinspection, violations have been corrected. A \$75.00 re-inspection fee will be required for each subsequent re-inspection when violations have not been corrected.

D. Drilling Bond

Prior to obtaining a permit to drill, the licensed driller must have a \$2,500 bond posted with DEH. This bond can either be a cash bond or an insurance performance bond. For details concerning drilling bonds, call (858) 565-5173.

E. Permit Conditions

1. Workplans

An approved drilling permit application does not constitute an approved workplan as defined in CCR Title 23, Article 11, Section 2722.

2. DEH Notification

The consultant/driller must notify DEH 48 hours before the date of drilling. Additionally, the consultant/driller must also notify DEH of any cancellation or rescheduling of drilling. Call (619) 338-2339 for all scheduled drilling, cancellations, or rescheduling.

3. Department of Water Resources Notification

Permittees must notify the California Department of Water Resources of their intent to drill.

California Department of Water Resources 770 Fairmont Ave. Glendale, CA 91203-1035

Phone: (818) 543-4613 Fax: (818) 543-4604

4. Well Log Submission

Within 60 days after construction or destruction of wells, or drilling of borings, a report with the following information must be submitted to DEH and the California Department of Water Resources (770 Fairmount Avenue, Glendale, CA 91203-1035) on DWR Form 118. The information for DEH must be sent directly to Monitoring Well Permit Desk, Site Assessment and Mitigation Program, County of San Diego, Department of Environmental Health, P. O. Box 129261, San Diego, CA 92112-9261.

- a. For wells and borings, provide:
 - (1) Location and identification of property by:
 - Site name and address
 - Assessor's parcel number
 - Establishment number (H#), if any
 - Well permit number
 - (2) A detailed plot plan drawn to scale showing location of site and nearest cross streets, property boundary lines, existing improvements such as USTs, piping, and/or utilities, and the location of all wells and borings, both existing and proposed.

- (3) A detailed log for each well/boring describing the density, moisture content, color, grain size distribution, and character of all lithologic units penetrated. The log must include:
 - Depth of first groundwater
 - Static water level in the completed well(s)
 - Date of measurement
 - Field vapor readings
- (4) A detailed "as-built" well construction diagram with type of casing, screened interval, screen slot size, type of filter pack, location and type of seals, and quantities of materials used, and surveyed well elevations and locations. Surveying must be performed by an appropriately licensed professional and meet the accuracy requirements of CCR Title 12, Section 2729-2729.1.
- (5) A grain-size analysis of the lithologic unit or units that represent soils adjacent to the perforated portion of the well, if performed.
- (6) All laboratory analysis data and chain of custody if there is no current DEH site assessment case.
- (7) The RG, CEG, RCE, or CHG is responsible for the accuracy and completeness of the logs and accompanying data. All well construction and boring reports must have the original signature of the registered professional and/or their seal as required by the Business and Professions Code.

b. For Well Destruction

- (1) Provide a detailed site plan, as outlined in Section 5.II.E.4.a. (2), drawn to scale, and giving accurate locations of <u>all</u> wells and borings with well identification numbers.
- (2) Include the location of the site by:
 - Site name and address
 - Assessor's parcel number
 - Well permit number and/or establishment number
- (3) Documentation of well destruction includes:
 - Description of the method of destruction
 - Description of the type of sealing materials and quantity used
 - Date the work was started and the date the work was completed

5. Storage of Drill Cuttings and Groundwater

a. Drum Labeling

Temporary drum storage of contaminated drill cuttings (soil) or groundwater requires proper labeling.

- (1) If the drill cuttings or groundwater is a hazardous waste, a hazardous waste label must be properly completed and affixed to drums. All hazardous waste must be managed, stored, and disposed of in accordance with all applicable hazardous waste laws and regulations.
- (2) If the drill cuttings (soil) or the groundwater is not suspected of being contaminated (e.g., awaiting laboratory results), the drums must be clearly marked with the following information.
 - Description of contents (e.g., soil, water)
 - Boring identification
 - Date of boring
 - Consulting company name
 - 24-Hour contact phone number

b. Drum Storage

All drums must be labeled and stored within a secure area. Drums containing hazardous waste must be removed within 90 days.

F. Permit Extension

A permit for wells and borings is valid for 120 days after approval. An extension of 120 days can be requested for an application fee of \$30.00. An extension must be applied for prior to the expiration of the permit. The maximum term of a permit cannot exceed one (1) year.

G. Well and Boring Standards

Please refer to Appendix B.IV for local standards on well construction, well reconstruction, and well and boring destruction. Additionally, San Diego County requires all work to comply with the Department of Water Resources Bulletins 74-81 and 74-90.

III. SOIL AND ROCK SAMPLING

A. Geologic Observations and Interpretations

Understanding the geology at a site is critical in designing and implementing site assessment and remediation programs. Observations of soil and rock types encountered during site investigations should be integrated with all site findings and correlated with the local geologic environment.

Consider the following items to improve your understanding of the site.

- Review of existing geologic information from all available sources such as:
 - Published geologic maps and reports,
 - > Personal or company experience in the site vicinity,
 - > Reference material at local university libraries,

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- ➤ Site investigation and assessment reports prepared by environmental consultants on file with governmental agencies such as DEH, RWQCB, building departments, or others.
- Review of aerial photographs
- Review of topographic maps
- Observation of road cuts, excavations, and other exposures in the site vicinity
- Drilling one or more soil boring(s) using continuous coring methods

It is important to understand the local geologic environment to interpret the significance of changes in soil and rock types encountered in excavations and boreholes at the site.

Field observations, chemical analytical data, presence of groundwater, and presence of free product should be detailed in boring logs and trench logs. The depth and thickness of perched water or zones with non-aqueous phase liquid (NAPL) above the water table should be logged, sampled, and reported on the boring logs. Drilling generates cuttings that can be logged and interpreted to describe the underlying rock type and geologic structure. An interpretation should be made between fill and native soil, and should include an identification of the fill and native soil contact. Furthermore, all soil and fill materials should be described by using a soil classification system. Rocks and geologic formations should be described by using an appropriate rock classification system.

A list of the observations that should be made and noted on field logs is presented in Table 5-1. Note that additional field descriptions for soils may be made depending on grain size. A key must be submitted with all boring logs. A list of field description guides is available in Appendix I.II, under *Technical References*.

An RG, CEG, RCE, or CHG who is registered with, or certified by, the State of California must log all soil and rock materials. A trained and experienced technician working under the direct supervision and review of one of these registered professionals shall be deemed qualified, provided this professional assumes responsibility for the accuracy and completeness of the logs. In addition, all work and reports that require geologic or engineering evaluations and/or judgments must be performed under the direction of an appropriately registered or certified professional. The registered professional must sign all reports containing such information.

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DESCRIPTIONS	(1) SOIL	(2) SEDIMENTARY			
Classification System	USCS	List system used			
Classification	ML, SW, CL, etc. Specify fill or native soil.	Sandstone, siltstone, conglomerate			
Distribution/Abundance of Grain Size	Relative (include maximum Particle size)	Relative (include maximum particle size)			
Minerals	Optional	List most abundant to least abundant			
Color	Munsell Color Chart	Munsell Color Chart			
Moisture Content/Saturation	Relative	Relative			
Odor	Optional	Optional			
OVA Readings	Optional	Optional			
Contaminant Discoloration	As present	As present			
Natural Organics	As present	As present			
Plasticity	Degree of	Degree of			
Visible Porosity	As applicable	As applicable			
Blow Counts	As applicable	As applicable			
Density (field)	Relative	Relative			
Induration	Optional	Relative			
Cementation	As present (type and degree)	As present (type and degree)			
Weathering	Not applicable	Degree of			
Fossil Assemblages or Trace Fossils	As present	As present			
Texture/Structure	Grain shape(s) layers/laminations	Bed thickness, laminations, sorting, packing, grain shape(s), fracturing or folding, etc.			
Other Observations	As present	As present			

DESCRIPTIONS	(3) IGNEOUS	(4) METAMORPHIC		
Classification System	List system used	List system used		
Classification	Diorite, monzonite, gabbro, dacite, basalt, etc.	Schist, gneiss, quartzite, mylonite, etc.		
Minerals	List most abundant to least abundant	List most abundant to least abundant		
Particle/Grain Size Distribution	Relative (include maximum particle size)	Relative (include maximum particle size)		
Color	Munsell Color Chart	Munsell Color Chart		
Moisture Content/Saturation	Relative	Relative		
Odor	Optional	Optional		
OVA Readings	Optional	Optional		
Contaminant Discoloration	As present	As present		
Natural Organics	Not applicable, unless in fractures	Not applicable, unless in fractures		
Visible Porosity	As applicable	As applicable		
Blow Counts	As applicable	As applicable		
Density (field)	Relative	Relative		
Induration	Relative	Relative		
Weathering	Degree of	Degree of		
Fossil Assemblages or Trace Fossils	Not applicable	As present (remnant)		
Texture	Euhedral to anhedral, equigranular to porphyritic, vesicular to scoriaceous, crystalline or glassy, etc.	Lineations, foliation, cleavage, cataclastic to mylonitic, etc.		
Structure	Size and density of fractures, faulting, folding, cleavage, etc.	Size and density of fracture faulting, folding, cleavage,		
Other Observations	As present	As present		

Site geology controls the migration of contaminants. An understanding of soil and rock types within their geologic framework allows for better determination of the location of additional soil borings and monitoring wells, should further assessment or monitoring of subsurface contamination be necessary. Graphical presentations such as geologic cross sections are essential to illustrate interpreted changes in soil and rock types (refer to Appendix F.I for examples of site maps and geologic cross sections). Site-specific geologic information is necessary to evaluate and design remediation programs and to perform fate and transport studies.

B. Sample Collection

The goal of the site assessment is to determine the nature and extent of contamination. The quality and integrity of samples, sample locations, and other field observations will strongly influence interpretation of site conditions. Sample collection, management, and analysis must be done in accordance with the procedures specified in:

- CCR Title 22, Division 4.5, Chapter 11, Article 3, Section 66261.20(c), and
- U.S. Environmental Protection Agency document, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, Third Edition (1986).

Many container types are available for contaminant sampling and/or storage. The contaminant class determines the type of container that is selected. Follow the protocols outlined in EPA SW-846 for selecting the appropriate containers and for determining proper handling and storage requirements. Sleeves or liners are generally used when volatile compounds are present or suspected. Their use, however, may be limited by certain geologic conditions in San Diego County. Non-clear sleeves and liners also limit observations of lithology and the presence or absence of contamination. For these reasons, glass jars with Teflon-lined lids are commonly used. When glass jars are used they should be filled completely to minimize headspace and reduce volatilization of target compounds.

C. Sampling to Delineate Contamination

Subsurface sample locations should be guided by the underlying geology, contaminant characteristics, and field conditions to determine the extent and magnitude of contamination. Discrete samples are required to demonstrate delineation of contamination; composite samples will not be accepted. Delineation is generally complete when successive nondetectable levels of contaminants are observed.

Samples are usually collected at intervals of 5 feet or less. However, thin distinct layers of contaminated soil may exist, or changes in lithology that affect contaminant distribution may occur within a 5-foot interval. Soil and rock samples, therefore, should also be collected at significant changes in lithology and other locations as necessary, based on field observations of contamination.

Within the capillary fringe and the saturated zone, samples should generally be collected at 1- to 2-foot intervals in order to delineate the "smear zone." For the purpose of this manual, the "smear zone" is defined as soil or rock in the vicinity of the capillary fringe, and below the water table, which contains contaminants in a sorbed or free product phase (light non-aqueous phase liquid or LNAPL). The smear zone develops when the water table fluctuates or is depressed by NAPL.

The smear zone will provide a continuing source of groundwater contamination and must be delineated for an effective remediation program to be designed.

Site-specific sampling protocol and sampling strategy must be presented in a workplan (Section 4.III), and should be discussed with DEH staff. Sampling plans often need to be modified during field operations; therefore, details of the sampling and analyses actually performed must be described in the site assessment report.

D. Drilling Techniques for Sample Collection

A number of sample collection techniques are used in subsurface investigations. Determining a suitable approach to sampling will depend upon the site accessibility, underlying lithology, and contaminant type. Driven sampling methods that utilize split-spoon samplers, probe/push-sampling techniques, and continuous coring techniques are preferred because these methods allow collection of samples at precise depths. Samples should be collected at least 6 to 18 inches in advance of the drill bit or auger to ensure that undisturbed native material is obtained.

Because the original borehole depth of grab samples collected from auger flights is uncertain, this sampling technique should only be used when driven-sampler and continuous-coring methods are not feasible. When grab samples are being collected, they should be obtained from the lowest flight of the auger and close to the auger stem. Caving or sloughing of the sides of the borehole in softer sediments may further complicate identification of grab sample depths and should be noted on field logs.

Drilling methods that add water, drilling fluids, or other substances into the boring during drilling may contaminate samples, spread contamination, and interfere with analysis for target compounds. A Material Safety Data Sheet (MSDS) must be obtained from the manufacturer for each drilling fluid or additive used at the site. For percussion drilling and other down-hole devices that require lubrication, a pure vegetable oil or other petroleum-free hydrocarbon lubricant must be used. Any substance introduced into the boring or drilling environment should be sampled for comparison analysis of target compounds if cross-contamination is suspected.

The most common drilling and auguring methods are presented in Table 5-2. Actual site conditions may affect the suitability of these methods. Alternative approaches must be discussed with DEH staff.

TABLE 5-2: SAMPLING TECHNIQUES

		<u> </u>			
METHOD	BEST RESULTS IN	NOT GOOD FOR	OTHER REMARKS		
Hollow Stem Auger	Fill, soil, most sediments	Larger cobbles, boulders, hard rock	Good for discrete, in situ samples		
Solid Stem Auger (18-24 inch diameter)	Fill, soil, cobbles, consolidated sediments	Cohesionless or saturated soil, boulders, hard rock	Large quantities of spoils; difficult sampling below water table; poor sample integrity		
Bucket Auger	Cobble-rich strata, consolidated sediments	Cohesionless or saturated soil, boulders, hard rock	Large quantities of spoils; difficult sampling below water table; poor sample integrity		
Probe/Push Samplers (CPT, Strataprobe, Geoprobe or like samplers)	Fill, soil, most sediments, weathered decomposed granite	Gravelly soil, cobbles, boulders, hard rock	Limited sample volume for analysis; limited depth. Doesn't penetrate consolidated soils.		
Air Rotary	Any soil or rock		Air may volatilize contaminants; air stream must be dual filtered		
Air Percussion	Cemented strata, conglomerate, boulders, cobbles, hard rock	Unconsolidated soils and sediments	Air may volatilize contaminants; air stream must be dual filtered		
Mud Rotary	Any soil or rock		Use only appropriate drilling fluids		
Rock or Diamond Coring	Hard rock	Gravels, cobbles, unconsolidated soils	Use face-discharging drill bit designed for environmental purposes		
Casing Hammer	Soil, unconsolidated river wash, gravel, cobbles, conglomerate	Hard rock			
Vibracores	Soft mud and other saturated, unconsolidated or benthic sediments	Consolidated sediments, hard rock			
Hand Auger	Fill, soil, most sediments	Cobbles, boulders, hard rock	Limited depth		

IV. SOIL VAPOR SAMPLING

A. Soil Gas Surveys

Soil gas surveys are an effective means to locate potential release points of contaminant vapors and are a useful method to approximate the aerial extent of contamination. Soil gases can travel long distances from the contamination source and are representative of the "general area of contamination." Soil gas surveys should be used cautiously when evaluating contaminated areas. Due to heterogeneous subsurface conditions, soil gas surveys can provide misleading results. Therefore, soil sampling should always be used to confirm the results of a soil gas survey.

The following guidelines are for conducting soil vapor sampling in San Diego County. The references used to develop these guidelines are presented in Appendix I.II. Soil vapor sampling may be used to:

- Evaluate the risk associated with vapor phase migration
- Identify potential soil contamination
- Identify the extent of vapor phase contamination
- Track vapor phase contamination over time
- Identify vapors emanating from contaminated groundwater
- Monitor landfills gases
- Monitor remediation systems

DEH neither endorses nor discourages the use of soil vapor sampling. The decision to perform soil vapor sampling is to be made on a case-by-case basis and should be discussed with lead agency personnel prior to implementation. For cases under DEH jurisdiction, a workplan describing the purpose and rationale for the soil vapor sampling, survey design including sample locations and sampling depths, and sampling protocols, both collection and analytical, must be submitted and approved prior to initiation of field work.

Soil vapor sampling may include either active or passive sampling methods. The active approach consists of the withdrawal of vapor from the subsurface, typically with a sampling probe, and direct analysis of the vapors in the field or laboratory. The method is quantitative and values are reportable in concentration units (e.g., parts per million by volume [ppmv], micrograms per liter of vapor [ug/l-vapor]). This approach is best suited to locations with relatively high soil permeabilities and contaminant concentrations.

The passive approach consists of emplacement of an adsorbent into the subsurface for a predetermined amount of time and subsequent analysis of the adsorbent. Because the amount of vapor that comes into contact with the adsorbent is unknown, measured values can only be reported as a mass (e.g., micrograms [ug]). Due to this limitation, passive sampling is useful for qualitative purposes only. This approach offers advantages over the active approach in locations of relatively low soil permeability and contaminant concentrations.

1. Collection of Soil Vapor Samples

The design and protocol of a soil vapor sampling program depend on the objectives of the program and the types of contaminants anticipated to be present. The following items need to be considered when a soil vapor sampling program is designed.

a. General Collection Issues

(1) All Survey Methods

Sample spacing: The selection of sampling points depends strongly on site-specific considerations. Predetermined and widely spaced grid patterns are most useful for reconnaissance work, while closely spaced, irregularly situated locations are commonly used for covering specific source areas.

Collection depth: Depths should be chosen to maximize the chances for detecting contamination yet minimize the effects due to changes in barometric pressure, temperature, or breakthrough from the surface. Experience has shown that for fuel-related sites, active vapor sampling should be completed below a depth of 5 feet, whereas for dry cleaners, samples should be collected directly below the slab (approximately 1 foot below the floor slab). In some cases vertical profiling may be appropriate.

Sampling After Rainfall Events: Because the impact of rain on soil vapor concentrations is still unclear, soil vapor sampling is recommended at least a few days after rain to increase the potential of representative values. The amount of time required is a function of site conditions, the amount of rainfall, and climatic conditions. To minimize the effects of rainfall, sampling should be completed 2 weeks after a rainfall event.

Sample Containers: The preferred containers for fuel-related analyses (total petroleum hydrocarbons [TPH_v], benzene, toluene, ethylbenzene, and xylenes [BTEX], CO₂, and O₂) include TedlarTM bags, gas tight vials (glass or stainless steel), and SummaTM canisters. These same containers can be used for halogenated solvent analysis (e.g., TCE, TCA, PCE); however, they should also be amber or opaque to eliminate photodestruction.

Sample Storage: The recommended maximum sample storage time for TedlarTM bags and gas tight vials is 48 hours after collection. The maximum sample storage time for SummaTM canisters is 2 weeks.

Sample Analysis: Target compounds, detection limits, and analytical protocols should be specified prior to vapor sampling. Please refer to Section 5.IX for minimum detection limits. Depending on site-specific health-based action levels, the soil gas detection limits may be lower than those presented in Table 5-12.

(2) Active Vapor Sampling Collection Issues

Purge Volume: For a representative soil vapor sample to be obtained, enough vapor should be withdrawn prior to sample collection to purge the probe and collection system of all ambient air. One to three system volumes is typically purged prior to sample collection. Purge volumes should be consistent for the entire field program and should be reported.

Probe Decontamination: All external parts should be wiped clean and washed as appropriate to remove any soil or contaminant films. All internal tubes or tubing should be purged with a minimum of 10 volumes of air or replaced.

Vacuum Pumps: Samples from systems employing vacuum pumps should be collected on the intake side of the pump with appropriate collection devices to ensure samples are not diluted with outside air. A pump that is specifically designed for air sampling is recommended.

(3) Passive Sampling Collection Issues

Collection Depth: The sampling depth for passive sampling generally ranges from 1 to 3 feet below ground surface.

Exposure Time: The minimum exposure time of the sorbent media should be 3 days.

Sorbent Media: The sample hole entrance to the sorbent media must be appropriately sealed to prevent contamination from the surface atmosphere.

b. Application-Specific Collection Issues

(1) Identifying Soil and/or Vapor Contamination

Collection Spacing: General grid spacing should range from 50 feet to 100 feet over non-source areas. Spacing over sources should range from 10 feet to 20 feet. Around USTs, one vapor sample should be collected from each side of the UST (minimum of four samples).

Collection Depth: For unknown sources and surface sources, samples should be collected from 3 to 5 feet below ground surface at a uniform depth across the site. For subsurface sources, samples should be collected from the bottom of the suspected source such as containment vessel, UST, pipe, or clarifier.

(2) Tracking Vapor Vertically

Collection Location: Vapor samples should be collected at the center of the contaminant plume.

Collection Depths: For upward migration, a minimum of 3 depths should be sampled from the depth of source to ground surface. These data will be used to establish vertical concentration gradients. For downward migration, a minimum of 3 depths should be sampled from the depth of the source to the groundwater table.

(3) Identifying Groundwater Contamination

Collection Location: Vapor samples should be collected upgradient and downgradient of the suspected source across the site.

Collection Depth: Samples should be collected within 5 feet to 10 feet of groundwater, depending on site stratigraphy and volatility of the contaminant.

(4) Monitoring of Vapor Extraction/Sparge Remediation Systems

Collection Locations: Samples should be collected from the well head of the extraction wells or the nearest sampling port to the well head. Samples should also be collected from the burner/filter influent, from the burner/treatment effluent, and from vapor monitoring wells at the edges of the property.

B. Laboratory Analysis of Soil Gas Samples

This guideline is intended for use whenever soil gas samples are collected for the purpose of conducting a health risk assessment for submittal to Site Assessment and Mitigation (SAM). SAM will not accept a health risk assessment if the associated soil gas samples have not been analyzed and reported in accordance with this guideline.

Volatile organic compounds (VOCs) within the unsaturated zone partition into the adsorbed, dissolved, free liquid, and vapor phases. Measurement of VOCs through an active soil gas investigation is an accepted site assessment practice. In San Diego County, soil gas concentrations of contaminants, such as benzene, are accepted as input into the SAM Vapor Risk 2000 assessment model for evaluation of potential increased risk to human health from vapor migration into buildings. The SAM Vapor Risk 2000 assessment model is described in the SAM Manual in Section 6 and at the SAM web site at (http://www.co.san-diego.ca.us/deh/lwq/sam/monitoring_well_program.htm). Since significant decisions are made based on the soil gas concentrations collected at contaminated sites, it is imperative that the soil gas data reported to this agency are consistently of high quality. The following guideline will assist in producing results of high quality.

1. Laboratory Analysis of Soil Gas Samples

a. Primary Target Compounds

Group A - Fuels Target Compounds					
Benzene	Tert-amyl methyl ether (TAME) ¹				
Toluene	Ethyl tertiary butyl ether (ETBE) ¹				
Xylenes	Tertiary butyl alcohol (TBA) ¹				
Ethylbenzene	Tetrachloroethene added as indicator compound				
Methyl tertiary butyl ether (MTBE) ¹	Trichloroethene added as indicator compound				
Di-isopropyl ether (DIPE) ¹					
Group B - Volatile Halogenated Hy	drocarbon Target Compounds				
Chloroform	1,1,1-Trichloroethane				
1,1-Dichloroethane	1,1,2-Trichloroethane				
1,2-Dichloroethane	Trichloroethene (TCE)				
1,1-Dichloroethene	Vinyl chloride				
Cis-1,2-Dichloroethene	Trichlorofluoromethane (Freon 11)				
Trans-1,2-Dichloroethene	Dichlorodifluoromethane (Freon 12)				
Dichloromethane (methylene chloride)	1,1,2-Trichloro-trifluoroethane (Freon 113)				
Tetrachloroethene (PCE)					
Group C - Combined Group Target	Compounds				
All compounds in Groups A & B					
Methane					

¹ Any reported values for these compounds must be confirmed.

Deviation from these Target Compound Groups may be allowed with prior consultation and approval of the SAM project manager.

b. Other Target Compounds

Analyze for other VOCs based upon site history and conditions.

c. Detection Limit (DL)

Attain the DL noted below for the target compounds. A higher DL is acceptable only for the compound(s) whose concentration exceeds the initial calibration range.

Compound	Detection Limit
Benzene	0.1 μg/l-vapor
Toluene, Ethylbenzene, and Xylenes	1 μg/l-vapor
MTBE, TAME, DIPE, and ETBE	1 μg/l-vapor
TBA	10 μg/l-vapor
VOCs (except vinyl chloride)	1 μg/l-vapor
Vinyl chloride	0.05 μg/l-vapor
Methane	10 ppmv

These DLs are based on a sample collected at a depth of 1 foot below the interior floor slab of a structure. Higher DLs may be applicable when samples are collected at deeper depths. In all cases, the DLs must clearly be below the concentration at which the risk is at, or below the one in one million health risk level. DLs in excess of this threshold may require additional testing.

d. Detectors

Use the following detectors in appropriate combinations:

- Electrolytic conductivity detector (ELCD/Hall)
- Photoionization detector (PID)
- Flame ionization detector (FID)
- Mass spectrometer (MS)
- e. Identification of Calibration Standards and Laboratory Control Sample (LCS)
 - (1) Properly and clearly identify all calibration standards and the LCS.
 - (2) Prepare the LCS from a standard that is totally independent from the standards used for the initial calibration. A totally independent source means a different supplier (whenever possible) or a different lot from the same supplier.
- f. Gas Chromatography (GC) and Mass Spectrometry (MS)
 - (1) Use a type of column that can separate all the target compounds. Coelution of the target compounds is not acceptable unless the compounds are distinguished and quantified by two different types of detectors in use at that time. For MS detection, resolution of all compounds is not required.

- (2) Analyze the initial calibration and daily mid-point calibration check standards, LCS, blank, and samples using the same GC conditions (or e.g., detector, temperature program, etc.).
- (3) Use a GC run time that is long enough to identify and quantify all the target compounds.

g. Initial Calibration

The initial calibration must be recorded in Table 5-3.

- (1) Perform an initial calibration:
 - for all compounds listed in Group A, or B, or C in Section 5.IV.B.1.a;
 - when the GC column type is changed;
 - when the GC operating conditions have changed; and
 - when the daily mid-point calibration check cannot meet the requirement in Section 5.IV.B.1.h.(3).
- (2) Include at least three different concentrations of the standard in the initial calibration, with the lowest one not exceeding five times the DL for each compound.
 - For MS detection, make certain that the mass spectrometer is tuned in accordance with the laboratory's standard protocol prior to the analysis of standards or samples (e.g., a 50-ng injection of 1,4-bromofluorobenzene meets the requirements listed in EPA Method 8260B).
- (3) Calculate the response factor (RF) for each compound and the calibration concentration prior to analyzing any site samples. Calculate the average RF for each compound. The percent relative standard deviation (%RSD) for each target compound should not exceed 20% except for the following compounds, which should not exceed 30%:

Trichlorofluoromethane (Freon 11)
Dichlorodifluoromethane (Freon 12)
Trichlorotrifluoromethane (Freon 113)
Chloroethane
Vinyl chloride
Tertiary butyl alcohol (TBA)

All target compounds that exceed these requirements must be flagged.

(4) Verify the true concentration of the standard solutions used with the LCS after each initial calibration. Conduct the verification using an LCS with a mid-point concentration within the initial calibration range. The LCS must include all the target compounds. The RF of each compound should be within ±15% of the initial calibration, except for Freon 11, 12, and 113; chloroethane; vinyl chloride; and TBA; which should all be within ±25% of the initial calibration. All target compounds that exceed these requirements must be flagged. Any compound that exceeds these requirements may be considered invalid for use in health risk evaluations.

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TABLE 5-3: SOIL GAS CALIBRATION TABLE

		` w		Fre SDe1 %RSD ACC RGE	%RSD ACC RGE				ND CLOSING CALIBRATION.		%DIFF ACC RGE
DATE:			INJECTION TIME:	3rd CONC RF.me RT/RRT MASS/CONC AREA RF	RF _{rre} SD _{p-1}				TROL SAMPLES (LCS) AN		LREA RF
AME:	INSTRUMENT ID:		NORMAL INJECTION VOLUME:	2nd CONC RF RT/RRT MASS/CONC AREA RF	MASS/CONC AREA				NT CALIBRATION STANDARD, SOIL GAS LABORATORY CONTROL SAMPLES (LCS) AND CLOSING CALIBRATION. STD LOT ID NO::	INJECTION TIME:	RT/RRT MASS/CONC AREA
LAB NAME:		721	NORMAI	1st CONC RT/RRT MASS/CONC AREA RF	OR RT/RRT	2 nd Conc. 3 nd Conc.	1st Conc. 2nd Conc. 3rd Conc.		IBRATION STANDAR	LUME:	DETECTOR
SITE NAME:	ANALYST:	INITIAL CALIBRATION	STD LOT ID NO.:	COMPOUND DETECTOR RT	COMPOUND DETECTOR	Compound 1	Compound 2	(Surrogate)	DAILY MID-POINT CALL ANALYST:	NORMAL INJECTION VOLUME:	COMPOUND (SURROGATE)

h. Daily Mid-point Calibration Check

The daily mid-point calibration check is required before analyses start in the morning. The daily mid-point calibration must be recorded in Table 5-3.

- (1) Check the calibration using the calibration standard solution with a mid-point concentration within the linear range of the initial calibration before any sample is analyzed.
- (2) Include the following compounds and **every** compound expected or detected at the site in the daily mid-point calibration check standard:

Group A	Group B	Group C		
Benzene	1,1-Dichloroethane	All of Group A		
Toluene	1,2-Dichloroethane	and B & methane		
Xylenes	1,1-Dichloroethene			
Methyl tertiary butyl ether (MTBE)	Cis-1,2-Dichloroethene			
Tetrachloroethene	Trans-1,2-Dichloroethene			
	Tetrachloroethene			
	1,1,1-Trichloroethane			
	1,1,2-Trichloroethane			
	Trichloroethene			

(3) Ensure that the RF of each compound (except for Freon 11, 12, and 113, chloroethane, vinyl chloride, and TBA) is within ±15% of the initial calibration's average RF. If detected, the RF for Freon 11, 12, 113, chloroethane, vinyl chloride, and TBA should be within ±25%.

i. Blank

- (1) Analyze field blank(s) to detect any possible interference from ambient air.
- (2) Investigate and determine the source(s) and resolve any laboratory contamination problem prior to analyzing any samples if the blank shows a measurable amount of the target compound(s).

j. Sample Analysis

- (1) Ensure that the requirements for the initial calibration, the daily mid-point check, the blank, and the LCS are met before any site samples are analyzed. If they are not, all reported values must be flagged with a footnote describing the deviance. Depending upon the project goals, the sample result may be considered inadequate and need to be resampled.
- (2) Analyze samples within 30 minutes after collection to minimize VOC loss. Longer holding time may be allowed if the laboratory uses special sampling equipment (e.g., sorbent trap, glass bulb) and demonstrates that the holding time can exceed 30 minutes with no decrease in results.

- (3) If the concentrations of constituents(s) in a sample exceed 10% of the highest concentration in the calibration range, either reanalyze the sample using a smaller volume and dilution, or flag the result and provide a narrative justifying the validity of the result. Be advised that depending upon the explanation and project goals, the sample result may be considered inadequate and need to be resampled.
- (4) Attain a DL as indicated in Section 5.IV.B.1.c If lesser sample volumes or dilutions are used to offset possible high concentrations of constituents in the initial run, use the initial run to calculate the results for constituents that are not affected by the high concentration so that a DL referenced in Section 5.IV.B.1.c can be achieved.
- (5) Quantify sample results using the average RF from the most recent initial calibration.
- (6) Add surrogate compounds to all samples. Ensure that the surrogate compound concentration is within the initial calibration range. Two to three different surrogate compounds [one aromatic hydrocarbon and two chlorinated compounds (early and middle eluting, except gases)] should be used to cover the different temperature programming range for each GC run.
- (7) Calculate the surrogate recovery for each GC run. Surrogate recovery should not exceed ±25% of the true concentration of the surrogate. If recoveries fall outside these limits, all reported values must be flagged with a footnote describing the deviance. **Depending on the preponderance of data, samples with data outside the limits may be required to be resampled and analyzed.**
- (8) Analyze duplicate samples at a minimum of 1 every 20 samples (5%).

k. Compound Confirmation

- (1) Conduct compound confirmation by GC/MS whenever possible. Use second column confirmation with surrogate(s) for compound confirmation if GC/MS is not used.
- (2) Add surrogate compounds to standards and site samples for second column confirmation to monitor the relative retention time (RRT) shift between GC runs. This is required for better compound identification when ELCD, PID and FID are used for analysis.
- (3) Usually one sample is adequate and quantitation is not required for second column confirmation. Second column confirmation can be done with a different GC. The representative sample can be collected in a TedlarTM bag and confirmation can be done off-site. The maximum holding time for samples in a TedlarTM bag taken to an off-site laboratory is compound specific. All TedlarTM bag samples, if transported by air, must be in an airborne pressurized cabin. For benzene, the maximum holding time is 4 hours. Please refer to the time frames outlined by the National Institute of Occupational Safety and Health (NIOSH) for other compounds. For further information on the NIOSH Manual of Analytical Methods (NMAM), 4th ed. DHHS (NIOSH) Publication 94-113 (August 1994), refer to the web site @ www.cdc.gov/niosh/nmam/order.html.
- (4) Second column confirmation is not necessary if the compounds present have been confirmed from previous soil gas investigations.

1. Samples with High Concentration

- (1) The DL may be raised above 1 μg/L for compounds with high results (i.e., the limit as specified in Section 5.IV.B.j.(3) and those closely eluting compounds for which quantitation may be interfered with by the high concentrations.
- (2) Quantify sample results according to Section 5.IV.B.j.(4) for analytes that are not affected by the high concentration compounds.
- (3) If high VOC concentrations in an area are known from previous soil gas analysis, Sections 5.IV.B.1.l.(1) and 5.IV.B.1.l.(2) are not necessary when analyzing samples from the area in question.
- (4) When dilution with ambient air is used for samples with high results, dilute and analyze in duplicate each day at least one sample to verify the dilution procedure.

m. Shortened Analysis Time

- (1) Shorten the GC run time only under the following conditions:
 - (a) The exact number and identification of compounds are known from previous soil and soil gas investigations; and
 - (b) The consultant has been given permission by an approved work plan by the lead agency to analyze only for specific compounds.
- (2) The following requirements must be met when shortening GC run-time:
 - (a) Based on the previous site assessment work on-site, the compounds present are fully known.
 - (b) The compounds must not coelute;
 - (c) Perform the initial calibration and daily mid-point calibration check and analyze the LCS and samples under the same conditions as the shorter GC run time;
 - (d) Quantitate using the average RF from the initial calibration utilizing the shorter run time; and
 - (e) Perform a normal run time analysis whenever peaks are detected within retention time windows where coelution, as indicated by the calibration chromatograms, is likely.

n. Last GC Test Run Per Day of Analysis

The closing calibration analysis must be recorded in Table 5-3.

(1) A closing calibration is required at the end of the day to verify that the calibration is still within limits. Include the same compounds used in the daily mid-point calibration check analysis, as listed in Section 5.IV.B.1.h.(2). Attain an RF for each compound within ±20% difference from the initial calibration's average RF, except for Freon 11, 12, 113, chloroethane, vinyl chloride, and TBA, which should be within ±30%. All target compounds that exceed these requirements must be flagged. Any results that exceed these requirements may be considered invalid for use in health risk evaluations.

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(2) Analyze the closing calibration standard at the detection limit concentration instead of the mid-point concentration if all samples from the same day of analysis show non-detect (ND) results. The recovery for each compound must be at least 50%. If less than 50%, all the ND results of the samples may be considered questionable.

o. On-site Evaluation Check Sample

- (1) Analyze the evaluation check sample on-site as part of the quality assurance/quality control (QA/QC) procedures when presented with such a check sample by lead agency staff. Provide preliminary results on-site.
- (2) If the QA/QC data do not meet the requirements of this guideline, all the results generated during the same day may be rejected. Correct all problems before any more samples are analyzed.

p. Site Inspection

- (1) Unannounced, on-site inspection by the lead agency may occur. The inspector or case manager may request hard copies of the complete laboratory data, including raw data for the initial calibration, daily mid-point check, LCS, and blank results. Failure to provide this information may result in the data being considered inadequate and may require samples to be reanalyzed.
- (2) The soil gas consultant must be able to answer reasonable inquiries on the use of the instruments, analytical procedures, and QA/QC procedures.
- q. Record Keeping in the Mobile Laboratory

Maintain the following records in the mobile laboratory:

- (1) A hard copy record of calibration standards and LCS with the following information:
 - (a) Date of receipt
 - (b) Name of supplier
 - (c) Lot number
 - (d) Date of preparation for intermediate standards (dilution from the stock or concentrated solution from supplier)
 - (e) ID number or other identification data
 - (f) Name of person who performed the dilution
 - (g) Volume of concentrated solution taken for dilution
 - (h) Final volume after dilution
 - (i) Calculated concentration after dilution
- (2) A hard copy of each initial calibration for each instrument used for the past few months
- (3) The laboratory standard operating procedures

2. Reporting of Soil Gas Sample Results and QA/QC Data

- a. Reports for all sample test results should be presented in the preferred reporting formats outlined in Table 5-4. The QA/QC data should be presented in the preferred reporting formats that are provided in Table 5-3. Compounds may be listed by retention time or in alphabetical order. Include in the table of sample results all compounds in the analyte list. Report unidentified or tentatively identified peaks. Submit all data requested upon request. Identify the source(s) of the contaminants detected in the investigation, as indicated by the data.
- b. Report the following for all calibration standards, LCS, and environmental samples:
 - (1) Site name
 - (2) Laboratory name
 - (3) Date of analysis
 - (4) Name of analyst
 - (5) Instrument identification
 - (6) Normal injection volume
 - (7) Injection time
 - (8) Any special analytical conditions/remark(s)
- c. Provide additional information, as specified, for different types of analyses. Tabulate and present in a clear legible format all information according to the following grouping:
 - (1) Initial calibration
 - (a) Source of standard (STD LOT ID NO.)
 - (b) Detector for quantitation (DETECTOR)
 - (c) Retention time (RT)
 - (d) Standard mass or concentration (MASS/CONC)
 - (e) Peak area (AREA)
 - (f) Response factor (RF)
 - (g) Average response factor (RF_{ave})
 - (h) Standard deviation (SD_{n-1}) of RF, i.e.,

$$n$$
[
 $RF_{ave} - RF_i$)² / (n - 1)]^{1/2}

n = number of points in initial calibration

- (i) Percent relative standard deviation (% RSD), i.e., (SD_{n-1} / RF_{ave}) x 100 (%)
- (j) Acceptable range of %RSD (ACC RGE)
- (2) Daily calibration check sample
 - (a) Source of standard
 - (b) Detector
 - (c) Retention time (RT)
 - (d) Standard mass or concentration
 - (e) Peak area

TABLE 5-4: SOIL GAS SAMPLE RESULTS

Data for retention time and soil vapor results can be placed in separate tables.

- (f) Response factor (RF)
- (g) Percent difference between RF and RF_{ave} from initial calibration (% DIFF)
- (h) Acceptable range of %DIFF (ACC RGE)
- (3) LCS (same format as daily calibration)
- (4) Environmental sample
 - (a) Sample identification
 - (b) Sampling depth
 - (c) Purge volume
 - (d) Vacuum pressure
 - (e) Sampling time
 - (f) Injection time
 - (g) Injection volume
 - (h) Dilution factor (or concentration factor if trap is used)
 - (i) Detector for quantitation
 - (j) Retention time (RT)
 - (k) Peak area
 - (1) Concentration in µg/L (CONC)
 - (m) Total number of peaks found by each detector
 - (n) Unidentified peaks and/or other analytical remarks
- (5) Surrogate and second column confirmation

Mark RT and compound name on (a) second column chromatogram of standard and (b) second column chromatogram of confirmation sample.

3. Acknowledgement

This guideline, although based on the State of California, California Regional Water Quality Control Board-Los Angeles Region *Interim Guidance for Active Soil Gas Investigation* (February 25, 1997), has been modified to meet SAM requirements. At present, EPA SW846 does not address soil gas as a matrix for the analytical methods SAM typically uses. Also, there is no California accreditation process to review the methodology or require specific QA/QC when soil gas is the matrix.

SAM accepts soil gas data for input into the SAM Soil Gas Vapor Risk 2000 assessment model for evaluation of potential increased risk to human health from vapor migration into buildings. Because of this, a higher level of accuracy and precision of the data is required than that necessary for soil gas surveys for other purposes.

V. DIRECT MEASUREMENT OF VAPOR FLUX

Due to site conditions it is sometimes necessary to directly measure the vapor flux though the floor of a structure. A flux chamber is used for this type of measurement. A flux chamber consists of an enclosed chamber that is placed on the surface to directly measure emissions. Flux chambers can be used to take either active or passive samples. Passive flux chambers have not been adequately tested under field conditions, and are therefore not recommended at this time and will not be discussed further. Active flux chambers measure vapor concentrations through time. This method is

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quantitative and yields both concentration data and flux data (mass/area-time). In general, numerous locations are tested to evaluate the varying conditions of the floor slab.

A. Active Flux Chamber

Equipment: The sampling equipment consists of an air-tight container open on the bottom, placed at least 2 centimeters (cm) into the soil with optional sample ports for temperature and pressure probes, an air distribution system for sweep gas, and an outlet gas line. To the outlet gas line, various sample trains can be attached to collect samples for later analysis, or instruments can be attached to analyze samples on-site.

Purge Volume: Before samples are taken, the chamber should be purged with at least 3 volumes of clean air (bottled "zero" air or ambient air that has been passed through a carbon filter).

Chamber Pressure and Temperature: Pressure and temperature should be kept as close to ambient as possible to minimize the possibility of losses to the atmosphere or addition of ambient air

Sweep Air Flow Rate: The incorporation and selection of the sweep gas flow rate depend on the anticipated concentrations, the purpose of the sample program, and modeling considerations. If the purpose of the sampling program is to estimate health risk when the soil is open to the atmosphere, it may be desirable to model ambient wind conditions.

Sample System Pumps: Sample pumps should be upstream of inlet carbon filters or after all grab sample ports to minimize the possibility that lubricants in the pump could contaminate the sample, or use pumps specifically designed for air sampling. The design of the sampling system should ensure that samples are not contaminated by ambient air.

Sampling Techniques: Samples from the chamber can be taken either as discrete samples or by adsorbing the chamber vapors onto an adsorbent medium.

Discrete Sample Containers: Discrete samples can be taken in either SummaTM canisters or TedlarTM bags. SummaTM canisters should be pre-evacuated. The vacuum should be measured before and after sampling.

Sorbed Samples: The laboratory that will analyze the sample should prepare the sorbent media.

Sampling Interval: Flux chambers should be sampled over a minimum of 3 time intervals.

B. Analysis of Samples

Refer to the previous section (Section 5.IV.B) for the discussion of methods.

VI. WELL DEVELOPMENT

The goal of well development is to improve hydraulic communication between the geologic formation and the well. Hydraulic communication is degraded when clay and silt in the formation (or in fractures), and/or drilling muds, are smeared on the borehole wall during the drilling process. Well development improves hydraulic communication by eliminating or reducing this smear. Development also improves the filtering action of filter pack that surrounds the well casing.

Most monitoring wells need to be developed after construction. The intensity of development depends on the purpose of the well and the nature of the water-bearing materials. There is no "cook book" formula for monitoring well development. Determining what constitutes acceptable development is a professional judgment that is left to the consultant. SAM will consider the quality of development when evaluating data obtained from the well and when establishing the length of monitoring programs.

A. Important Terms

Non-aqueous phase liquid (NAPL): Immiscible liquids that are found on the surface of the water table, at the base of the well and in the formation's interstitial pore space in both the saturated and unsaturated zones. When NAPL is observed in a well, it is commonly referred to as phase-separated product, free product, floating product, light non-aqueous phase liquid (LNAPL) or dense non-aqueous phase liquid (DNAPL).

Water-bearing materials: Term that is generally equivalent to aquifer. In San Diego County many water-bearing formations do not meet the textbook definition of an aquifer; nevertheless, these formations are subject to investigation and remediation.

Well development: The process by which hydraulic communication between the well and the surrounding material is improved.

Filter pack: Also known as sand pack or gravel pack. The filter pack consists of non-reactive granular material matched to the slot size of the well screen to prevent the movement of fines into the well.

B. Selection of Well Development Method

The quickest and possibly the only effective way to remove clay smear is to generate a strong back-and-forth flow of water between the well bore and the formation. Several development methods generate a back-and-forth flow. Method selection is influenced by the type of formation material, drilling method used, well recovery rate, well depth, depth to water, contaminants, purpose of the well, and other factors that only an experienced professional can determine. The advantages and disadvantages of various well development methods are discussed in the National Water Well Association's document entitled *Handbook of Suggested Practices for the Design and Installation of Groundwater Monitoring Wells* (Aller et al., 1989, p. 228-245).

In general, block surging and airlifting are acceptable development methods. Over-pumping is commonly used for development but is not as effective as those methods mentioned above. The use of vacuum trucks has similar results as over-pumping and is discouraged. Other methods may be suitable but should be discussed with the regulatory agencies before implementation.

C. Considerations

The following items should be considered when using monitoring wells to obtain water quality data.

- 1. A well that has never been properly developed may be a questionable source of data. Documentation of well development is necessary for a well to be considered reliable.
- 2. A well should be redeveloped when its use changes, when the data become suspect, or when the well becomes "silted-in," bio-fouled, or encrusted.
- 3. NAPL sometimes appears in a well weeks to many months after construction. While this may indicate actual spreading of the product, it can also reflect insufficient initial well development or a formational material with low hydraulic conductivity. Unexplainable variation in groundwater sample results over a period of time may be the result of "delayed development" caused by repeated purging of the well.
- 4. San Diego County considers that reliable observation of static water level and NAPL thickness frequently cannot be made until at least 72 hours after well development. Therefore, samples should not be obtained until at least 72 hours after proper well development, or possibly longer if NAPL is expected.
- 5. Stability of field-measured turbidity has been used to indicate effectiveness of well development.
- 6. No specific values exist for duration of development activity, or the volume of water to be removed as part of the development process. The purpose of the well, type of contaminant, and geologic conditions must be considered when deciding on the appropriate level of development.
- 7. If water has been added during drilling, at a minimum that volume of water must be removed in addition to the development water.
- 8. Well development will cause a filter pack to settle. It is recommended that partial development take place before any sealing material is placed above the filter pack. This will increase the long-term reliability of the surface seal. Complete the development process after seal installation.

D. Reporting

It is essential that the development process be clearly documented in the reports submitted to SAM. The following information should be reported:

- Description of development method used,
- Date and duration of development,
- Quantity of water removed,
- Type and quantity of anything (including water) added during drilling and development, and
- Qualitative description of well water throughout the development process (clear, cloudy, etc.).

VII. WELL PURGING AND SAMPLING

This guideline has been developed to provide for consistent and representative sampling of groundwater monitoring wells. The well or wells to be sampled are assumed to be properly constructed and developed. This section focuses on sampling of groundwater for dissolved organic chemicals but can also be applied to sampling of inorganic compounds.

Over the last 20 years there has been considerable research and evaluation of the requirements for purging of wells and sampling methodologies. Sampling approaches can vary depending on the goal of the sampling program. In general there are four methods that have been accepted. These are high-flow purging and sampling, low-flow purging and sampling, no-purge discrete sampling, and non-purge grab sampling. It should be noted that consistency over time is very important. The same methods should be used each time the wells are purged and sampled unless a different purging method would improve sample quality and data precision.

A. Important Terms

Borehole volume: Volume of water that is contained in the well casing plus volume of water contained in the pore spaces of the filter pack.

Recovery: The measure of a well's return to its static water level after purging.

Fast recovering well: A well is considered to be fast recovering if recovery to 80 percent or more of its static condition occurs within 2 hours when using the high-flow purging method.

Slow recovering well: A well is considered to be slow recovering if recovery to 80 percent of its static water level takes longer than 2 hours when using the high-flow purging and sampling method.

Purging: The act of evacuating (removing) water from a well. This includes water in the blank casing, screened casing, and filter pack.

Sample: A subset of a whole, which is representative of the whole.

Depth Discrete Sample: Distinguished from a grab sample by having a specific location in the well (i.e., depth).

Flow Sample: A sample collected from a pump.

Grab Sample: A sample obtained in a single aliquot or mass using a device specifically designed for the purpose. Grab samplers may include a bailer or other similar device(s).

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Stability: Refers to the consistency of field water quality indicator parameters over a specified time interval. The most sensitive field parameters are dissolved oxygen, specific conductance, and temperature.

Purging and Sampling Methods: The following methods are currently approved by SAM.

High-flow Purging and Sampling: Purging using a pumping rate greater than 1 liter per minute (lpm) or 0.26 gallon per minute (gpm) (Barcelona and Puls, 1996). Traditionally, the high-flow purging method has been widely used. This method typically involves the removal of up to 3 borehole volumes prior to sampling. Samples are most often collected with a bailer or other device after completion of purging. This methodology provides a composite of the contaminant concentration within the well and will likely not be suitable for low yield wells.

Low-flow (Low Stress or Low Impact) Purging and Sampling: Purging using a pumping mechanism that produces low-flow rates (less than 1 lpm or less than 0.26 gpm), which causes minimal drawdown of the static water table and usually employs a flow cell in which geochemical parameters are continuously monitored. These parameters may include dissolved oxygen content, oxidation-reduction potential (redox), conductivity, turbidity, and/or pH. Samples are obtained when all chemical parameters have stabilized thus demonstrating qualitatively that the groundwater being purged is in equilibrium (refer to Table 5-7). Samples are collected directly from the pumping mechanism with minimum disturbance to the aquifer groundwater. The low-flow purging method (purging to parameter stability) tends to isolate the interval being sampled, provides more accurate water quality measurements, and reduces the volume of purge water generated. This method has an advantage in that it can limit vertical mixing and volatilization of volatile organic compounds in solution within the well casing or borehole as compared to high-flow purging and sampling.

Non-purge Grab Sampling: The non-purge grab sampling method refers to the Western State Petroleum Association's (WSPA) sampling methodology that was proposed in 1996 for fuel releases and approved by the State Water Resources Control Board in 1997. This sampling methodology involves the collection of a grab sample taken from a well without purging. The sample is acquired using a grab-type-sampling device and is generally acquired at or near the air-water interface of a well. These samples may not be representative of the aquifer water quality. To date the studies on this method are limited and inconclusive. This method is allowed on a limited basis and generally a comparative testing plan is required prior to approval.

No-purge Discrete Sampling: This method includes discrete point-interval sampling (DPIS) devices and other devices that allow sampling from a discrete interval within a well without compromising the vertical stratification of water quality conditions in the well bore. A discrete sample is acquired without splitting and must be taken from a well that has been demonstrated to have a net flow, or a measured flow through the well. Such sampling is useful for characterizing specific zones or intervals within a saturated well screen or borehole.

B. Purging and Sampling Methodology

This section outlines procedures for high-flow, low-flow, non-purge grab, and discrete interval sampling. For consistency and to help evaluate results over time, the use of one method of purging and sampling over time is highly recommended.

There has been significant discussion in the literature regarding shifting from the high-flow purge methodology to the low-flow purge methodology. The low-flow methodology has been demonstrated to minimize or overcome many of the limitations created by the high-flow purging method. These limitations include sample turbidity, alteration of sample chemistry, altered ambient flow conditions, and the need to purge excessive volumes of water to achieve stability.

In the high-flow purging method, low-yield wells have often been evacuated to dryness and allowed to recover prior to sampling. In many cases, wells that are considered to be "low yield" could readily be pumped continuously at sustained rates less than 1 lpm or 0.26 gpm. In these situations, the low-flow method is recommended.

The evacuation of the well to dryness poses several problems. These are:

- Cascading water as the well recovers results in changes to water chemistry due to aeration and volatilization,
- Draining water from the filter pack may result in air being trapped in the pore spaces, with lingering effects on water chemistry,
- Increased sample turbidity may result from the stress on the formation and stirring up of settled solids in the bottom of the well, and
- The excessive time required for sufficient recovery of the well may affect sample chemistry through prolonged exposure to the atmosphere.

Depending on the purging method to be used there are specific equipment limitations. Table 5-5 provides a description of the various methodologies and their applicability.

TABLE 5-5: PURGING METHODS					
Method	Low-flow (< 1 lpm)	High-flow (> 1 lpm)			
Peristaltic Pump	1	2			
Centrifugal Pump	3	3			
Submersible Impeller Pump	1	3			
Bailer	X	2			
Bladder Pump	3	3			
Vacuum Truck	X	1			

- Not recommended, better methods exist
- 2 Useful with limitations
- Recommended method
- X Unacceptable

Proper selection of sampling devices or pumps is critical to the quality and representativeness of the sampling results. Table 5-6 provides a summary of the acceptable sampling methods for the various chemicals of concern.

TABLE 5-6: ACCEPTABLE SAMPLING METHODS FOR CHEMICALS OF CONCERN								
	Analytical Sampling							
		Semi	Metals and	Petroleum				
Method	VOCs	VOCs	Inorganics	C3-C16	C16+	Chemistry		
Peristaltic Pump	X	1	3	X	1	2		
Centrifugal Pump	2	3	3	2	2	3		
Submersible Impeller Pump	2	3	3	2	3	3		
	3 if low-flow							
Bailer	2	2	2	2	2	2		
Bladder Pump	3	3	3	3	3	3		
Vacuum Truck	X	X	X	X	X	X		
DPIS	3	3	2	2	2	2		
Diffusion Sampler	2	2	X	2	2	X		
Grab Sampler	2	2	2	2	2	2		

- Not recommended, better methods exist
- 2 Useful with limitations
- Recommended method
- X Unacceptable

Notes: Centrifugal pump—assumed at a low-flow rate (no greater than 1 lpm)

1. High-flow Purging and Sampling Method

This method is widely used and involves the removal of water from the well at a rate in excess of 1 lpm (0.26 gpm) by a variety of methods, including pumps, bailers, etc. The following steps are necessary to collect representative samples. Well purging to "dryness" should be avoided for the reasons cited in Section 5.VII.B. Consideration should be given to the use of low-flow or passive purging methods in the future.

a. Measure for NAPL

LNAPL and DNAPL may be present in groundwater monitoring wells. If NAPL exists, the well sampling procedure described in this section will typically not apply. Special considerations may be necessary and should be discussed with the SAM project manager on a case-by-case basis.

b. Measure Water Level

The groundwater level in the monitoring well should be measured to an accuracy of 0.01 foot prior to purging and sampling activities.

c. Placement of Pump

The pump should be placed in the lower one-third of the well screen.

d. Calculation of Borehole Volume

The following equation can be used to calculate the borehole volume.

$$BV = \begin{array}{cc} 7.48 \ \pi \\ (------) \ [\ CD^2 + P \ (\ BD^2 - CD^2 \) \] \ (WD - GW) \end{array}$$

Where: BV = the borehole volume (gal)

CD = the casing diameter (ft)

P = the porosity of the filter pack (e.g., if porosity is 25% use

0.25 in the formula)

BD = the borehole diameter (ft)

WD = the well depth (ft)

GW = the depth to groundwater (ft)

Note: The above equation, as written, applies to wells constructed straddling the water table. The equation may be modified for circumstances where the static water table is above the top of the filter pack.

e. Calculation of Percent Recovery

The following equation may be used to calculate the percent recovery after purging.

Where: PR = the percent recovery (%)

RD = the residual drawdown (ft) - the difference between the

water level prior to purging and the measured water level

at any time after purging

MD = the maximum drawdown (ft) - the difference between the

static water level prior to purging and the measured water

level immediately after purging

f. Parameter Stability

It is assumed that parameter stability is achieved when the difference between successive measurements is less than 10 percent. Generally, measurements are made after one borehole volume is removed and then at one-half borehole volume intervals. Commonly, the measurement of temperature, specific conductance, and pH are used exclusively, but it has been found these parameters are less sensitive to field conditions. It is recommended that dissolved oxygen, turbidity, specific conductance, and temperature be monitored.

g. Purge Well

The well must be purged with a device that does not compromise the sample by cross-contamination, aeration, or other negative effects. Refer to Table 5-5 for the acceptable purging devices for this method.

(1) Fast Recovering Wells

DEH considers the following two options acceptable methods for properly purging fast recovering wells:

(a) Option I

- i. Remove 3 borehole volumes of water.
- ii. Allow the well to recover to 80% of its static condition prior to collecting the sample.

(b) Option II

- i. Remove 1 borehole volume of water.
- ii. Conduct field water-quality measurements (dissolved oxygen, turbidity, specific conductance, and temperature).
- iii. Remove an additional ½ borehole volume of water. Conduct field water quality measurements again. If the first and second measurements vary by less than 10%, purging is considered adequate. Proceed to step (v.) below.
- iv. Repeat step (iii) until the measurements vary by less than 10% or until 3 borehole volumes of water have been removed.
- v. Allow the well to recover to 80% of its static condition before collecting the sample.

(2) Slow Recovering Wells

- (a) Remove 1 borehole volume of water.
- (b) The well should be allowed to recover for 2 hours after purging has stopped. Then the well should be sampled as soon after 2 hours as possible. Note that if the well recovers to greater than 80% in less than 2 hours, it is a fast recovering well. If so, follow the steps in Option I or II above.
- (c) Consider using the low-flow method for future sampling events (refer to Section 5.VII.B.2, below).

h. Collect Samples

After the monitoring well has been properly purged, the guidelines below for groundwater sample collection should be followed.

- (1) In the case of a fast recovering well, samples should be collected when the well has recovered to 80%. In the case of a slow recovering well, samples should be collected as soon as possible after 2 hours have elapsed.
- (2) Collect groundwater samples from wells with sampling equipment in accordance with Table 5-6.

- (3) Sampling equipment must be compatible with the contaminant being analyzed.
- (4) Sampling equipment should be decontaminated before use.
- (5) Samples requiring organic analyses should not be filtered.
- (6) Samples should be transferred from the sampling device to a container in a manner that minimizes aeration.
- (7) Samples should be collected in approved sample containers appropriate for the type of analysis to be performed.
- (8) Samples should not be transferred from one sample container to another.
- (9) Headspace in sample containers should be avoided.
- (10) EPA SW-846 sample preservation and holding times for specific analyses should be followed.
- (11) Appropriate sample chain-of-custody procedures must be followed (refer to Section 5.X).
- (12) Appropriate QA/QC procedures must be followed (refer to Section 5.X).

2. Low-flow Purging and Sampling Method

The low-flow purging and sampling method has been described in the literature since the mid-1980s with a defined methodology being accepted by the U.S. EPA in 1995. An overview of this methodology is presented in a U.S. EPA Ground Water Issue paper titled "Low-Flow (Minimal Drawdown) Ground-Water Sampling Procedures" by Robert Puls and Michael J. Barcelona dated April 1996.

Low-flow purging and sampling is appropriate for collection of groundwater samples for all groundwater contaminants, including inorganic compounds, metals, pesticides, polychlorinated biphenyls (PCBs), volatile and semi-volatile organic compounds (VOCs and SVOCs), other organic compounds, and radiochemical and microbiological constituents. This method is not applicable to the collection of LNAPL or DNAPL.

Low-flow refers to the velocity of the water entering the pump intake. Low-flow purging also results in limited drawdown. This method can be applied to wells that meet the following criteria:

- The well can be pumped at a constant low-flow rate of 0.1 to 1.0 lpm, with an overall **goal** of less than 0.10 meter or 0.33 foot of drawdown in the well during purging. This goal may be difficult to achieve under some circumstances due to geologic heterogeneities and may require adjustment based upon site-specific conditions. The goal is to minimize drawdown and achieve a stabilized pumping water level as soon as possible.
- The maximum well screen or open borehole intake length should be 20 feet when sampling from a single point within the intake.

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• Where the screen or open zone is longer than 20 feet and a target zone cannot be identified based on either of the boring logs, it may be necessary to sample multi-levels to identify the target zone.

a. Pump Placement

Proper pump placement requires detailed knowledge of the site's lithology, the hydrogeologic properties, and the well construction details, along with the specific goals and objectives of the monitoring program. The following is general guidance on pump placement.

(1) Homogeneous Geologic Conditions

For a well screened or open across a single homogeneous geologic unit and where the saturated interval is not more than 20 feet long, the pump intake should be positioned in the mid-point of the screened or open zone. It is assumed under these conditions that water will be drawn from the entire intake area, even under low-flow pumping rates. Where the compounds of interest are known to concentrate near the top or the bottom of the screen zone, it may be desirable to locate the pump intake in the upper one-third or lower one-third of the interval, respectively.

(2) Heterogeneous Geologic Conditions

For a well screened or open across heterogeneous geologic conditions and where the saturated interval has layers of contrasting permeability, it may be necessary to locate the pump intake adjacent to any anticipated preferential flow pathways or zones of concern.

b. Flow Rate

The flow rate used during purging must be low enough to avoid increasing the water turbidity. The following measures should be taken to determine the appropriate flow rate.

- The flow rate should be determined for each well, based on the hydraulic performance of the well.
- The optimum flow rate for each well should be established during well development or redevelopment, or, if possible, in advance of the actual sampling event.
- The flow must be adjusted to obtain stabilization of the water level in the well as quickly as possible.
- The maximum flow rate used should not exceed 1 lpm (0.26 gpm).
- Once established, this rate should be reproduced with each subsequent sampling event.
- If a significant change in initial water level occurs between events, it may be necessary to reestablish the optimum flow rate at each sampling event.

c. Measurement of Water Level and Drawdown

Measurement of the water level in the well during purging is important when establishing the optimum flow rate for purging. The goal is to achieve a stabilized pumping water level as quickly as possible with minimal drawdown, to avoid stressing the formation and mobilizing solids and to obtain stabilized indicator parameters in the shortest time possible.

d. Measurement of Indicator Parameters and Turbidity

Continuous monitoring of water quality indicator parameters is used to determine when purging is completed and sampling should begin. Stabilized values, based on selected criteria listed in Table 5-7 should be met prior to sampling. The use of an in-line flow cell (closed) system is recommended for measuring indicator parameters, except for turbidity. Indicator parameter collection is more important when low-flow purging is used and additional parameters are needed as compared to the high-flow purging method.

Generally, measurements are taken every 3 to 5 minutes and water chemistry parameters are considered to be stable when they are within the following ranges for three consecutive readings.

TABLE 5-7: STABILITY CRITERIA FOR LOW-FLOW PURGING			
Constituent	Criteria		
Dissolved Oxygen Content (DO)	$\pm 0.2 \text{ mg/l}$		
Oxidation-Reduction Potential (redox)	± 20 mv		
Turbidity	± 10 %		
Specific Conductance	± 3-5% of reading		
Temperature	\pm 3% of reading (min. of \pm 0.2°C)		
pН	\pm 0.2 units		

e. Equipment Requirements

Because the methodology requires that disturbance to the water column in the well be minimized, the same pumping device used for purging should be used for sampling (i.e., the pump should be left in place after purging). Refer to Table 5-5 and Table 5-6 for the proper pumping equipment for the low-flow method.

(1) Dedicated and Portable Systems

Studies have shown that installation of any device into a well disturbs the stratification typically exhibited in a well due to laminar flow of groundwater in the well. Insertion also potentially mobilizes suspended solids in the water column due to disturbance of settled and adhered solids in the casing and agitation of water in the filter pack. Therefore, low-flow purging and sampling techniques are more accurate when dedicated systems are used. Dedicated systems result in lower initial turbidity values and lower purge volumes to achieve stabilized indicator parameter readings and should be considered when a well will be sampled multiple times.

If portable systems are used, they must be placed carefully into the well and lowered into the screen zone as slowly as possible. Placement of the portable pump can disturb the groundwater flow conditions resulting in non-equilibrium conditions. Therefore, longer purge times and greater purge volumes may be necessary to achieve indicator parameter stabilization. In general, this may require that, after installation, the portable pump should remain in place for 1 to 2 hours to allow settling of solids and re-establishment of horizontal flow through the screen zone. If initial turbidity readings are excessive (>50 nephelometric turbidity units [NTU]), pumping should cease and the well should rest for another 1 to 2 hours before reinitiating pumping. In wells set in very fine-grained formations, longer waiting periods may be required. If the well consistently produces high turbidity water (>50 NTU), even at low pumping rates, redevelopment of the well should be considered before further sampling.

(2) Water-Level Measurement Equipment

Continuous water-level measurement devices are preferred, such as down-hole pressure transducers, but electronic water-level tapes can be used. The devices used must be capable of measuring to 0.01-foot accuracy.

(3) Indicator Parameter Equipment

Measurement of indicator parameters (dissolved oxygen content, redox potential, specific conductance, temperature, and pH) is required. This is most easily performed using an in-line flow cell (closed) system attached directly to the pump discharge tubing. For turbidity measurement, a separate field nephelometer should be used.

f. Collect Samples

After the monitoring well has been properly purged using the low-flow method, use the guidelines outlined in Section 5.VII.B.1.h (where appropriate) for groundwater sample collection. However, when using this method it is of utmost importance to collect the groundwater samples using the same pump or device used for low-flow purging without moving it or causing disturbance to the well.

3. Non-Purge Method

The San Diego RWQCB has concluded that use of the non-purge sampling method (as outlined in the California Groundwater Purging Study for Petroleum Hydrocarbons prepared for the Western States Petroleum Association (WSPA) in October 1996) can be considered for wells that meet the following minimum conditions:

- The only contaminants of concern are gasoline petroleum hydrocarbons,
- No NAPL exists in the well,
- The well construction details are known and documented,
- The well is screened across the water table, and
- The well is properly developed.

Prior to implementation of this method, SAM may request multiple monitoring events using the standard purging and sampling method in conjunction with the non-purge method to determine repeatability and variance of the methods.

A formal request must be submitted with a California registered professional (RG, PE, CEG, CHG) certifying the items listed above, and a statement that the non-purge method will provide representative water quality results for the compounds of concern.

4. Discrete Point-Interval Sampling (DPIS)

The purpose of DPIS is to collect groundwater samples from monitoring wells that represent groundwater conditions vertically in the well. This is accomplished by obtaining the samples at pre-determined depths within the screened interval of the well. The use of DPIS is effective for collecting zone-specific and vertical profile samples from a well. Vertical profiling can be used to identify zones of concern for future long-term sampling programs.

The DPIS has three primary benefits:

- Minimizes disturbance of sediment in the bottom of the well, thereby producing a sample with low turbidity,
- Eliminates aeration of groundwater during sample collection, and
- Eliminates the need to purge well (in wells that have demonstrated net flow or measured flow through the well).

This procedure addresses the collection of water samples and NAPL (if present).

a. Review Available Site Historical Data

If available, review the borehole logs and well construction logs to determine the geologic and hydrologic conditions associated with the well.

b. Measure Water Level

Measure the groundwater level in the monitoring well to an accuracy of 0.01 foot prior to sampling activities.

c. Prepare DPIS Sampling Device

Select an appropriate DPIS sampling instrument and prepare for sampling in accordance with the manufacturer's specifications. Make certain that the equipment has been properly decontaminated prior to use. All sampling equipment must be compatible with the contaminant being analyzed.

d. Well Purging

Well purging is not required for DPIS sampling instruments when used in accordance with the manufacturer's specifications.

e. Sample Collection

- (1) After the monitoring well has been properly gauged and surveyed for NAPL, and the depth of the top of the screened interval has been determined, the following procedures should be followed for sample collection.
- (2) Deliver the sampling instrument to a pre-determined depth that is a minimum of 6 inches below the top of the screened interval of the well:
 - (a) Discrete Interval Sampling
 - (i) Sample from the top of the well down to limit disturbance in the well.
 - (b) Routine Monitoring
 - (i) After proper vertical profiling of the well, routine sampling shall be taken from the zone of highest concentrations.
 - (ii) For closure (final phase) sampling, vertically profile the well in accordance with the original procedures used in the initial vertical profiling.
 - (iii) Where applicable, follow the sample handling guidelines outlined in Section 5.VII.B.1.h.

C. Groundwater Sampling from Excavations and Boreholes

Groundwater samples collected from open excavations and boreholes may not be representative of groundwater present within adjacent formations for some of the following reasons:

- Open excavations may have a large water-surface area exposed to the atmosphere that allows the rapid loss of VOCs dissolved in the groundwater.
- The sloughing of contaminated soils from the sidewalls can contaminate groundwater within an open excavation.
- Open excavations may also collect surface water runoff, which would dilute any contaminants present in the groundwater and/or add other contaminants.
- Groundwater samples from open boreholes have similar limitations, as well as potential turbidity problems.

DEH recognizes that these groundwater samples can be useful as screening tools or for water disposal characterization; however, the consultant should confer with DEH before doing such sampling. In areas where groundwater has beneficial uses and where stringent cleanup standards apply, water samples from open excavations or boreholes are discouraged and DEH or the RWQCB may not accept the results.

D. Groundwater Sampling from Wells Installed in Excavations

On some sites, well casings have been placed into former UST excavations and the excavation has been backfilled with sand or gravel. Most of these excavation wells have been intended for potential recovery of free product or contaminated groundwater, not water quality sampling. The

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use of UST excavation wells for groundwater elevations and groundwater quality may not be representative of conditions within the adjacent geologic formation. The consultant should confer with DEH prior to sampling from such wells.

If excavation wells are to be used to obtain groundwater samples, protocols for groundwater sampling from traditional monitoring wells should be followed in principle. Collection of groundwater samples from excavation wells should occur only after a sufficient volume of water has been removed in order to purge the well casing and the sand or gravel backfill in the former UST excavation. Purge volume includes water in the well casing plus the water within the pores of the sand or gravel filling the entire excavation.

An approved well/boring permit application from DEH is required prior to constructing or destroying a UST excavation well. These wells must be constructed in compliance with state and county well construction standards.

E. Groundwater Sampling Using Alternative Sampling Devices

Recent studies suggest that sampling devices other than the traditional monitoring well can be used to obtain representative groundwater samples for initial characterization to aid in the placement of permanent groundwater monitoring wells. Proposals to use alternative sampling devices (e.g., well points, direct push or BAT® samplers) will be considered on a case-by-case basis and will be reviewed within the context of the goals of the site assessment.

Unlike traditional monitoring wells, which are usually screened over several feet of the water-bearing formation, alternative sampling devices are typically more depth discrete. For petroleum hydrocarbon cases in which contaminants tend to be found near the water table, care must be taken to ensure that these sampling devices are positioned to collect a sample from this zone. It is also important to follow the manufacturer's instructions to ensure that valid samples are collected.

Correlation of groundwater sample results with those from adjacent monitoring wells, or collection of groundwater samples from multiple depths at each sampling point to determine the vertical distribution of contamination may be required. Some of these alternative sampling devices provide a one-time opportunity to obtain a sample; this could be a disadvantage if additional sampling and monitoring is necessary.

Groundwater elevation data can be obtained from some alternative sampling devices. Because of the slow recovery rate of some geologic formations, these data are generally not considered reliable for determining groundwater gradient or static water conditions.

F. Groundwater Monitoring and Reporting Checklist

The following guidelines provide a consistent format for a groundwater monitoring program. A groundwater monitoring program includes:

- Measurement of groundwater elevation,
- Measurement of NAPL thickness (if present),
- Analysis of dissolved chemical concentrations,
- Interpretation of results, and
- Reporting.

This information is incorporated into a monitoring report that is submitted to DEH. **The report must include interpretations of the data and be signed by an appropriately registered professional.** The monitoring frequency will be established by the lead agency (either DEH or the RWQCB). Monitoring frequency can vary depending on site-specific conditions, but the most common monitoring frequency is quarterly (every 3 months).

The following checklist provides a general format to achieve consistent reporting of groundwater monitoring programs.

1. Monitoring Activities

- a. Accurately survey all wells horizontally and vertically relative to a fixed point. The vertical measurement should be to an accuracy of 0.01 foot.
- b. Measure depth to groundwater and NAPL (if present) in all wells to within 0.01 foot from a permanent reference mark on the well casing.
- c. Follow the guidelines for well development, purging, and groundwater sampling.
- d. Collect groundwater samples from designated wells. Generally, these wells will not contain NAPL.
- e. Submit all samples to a California State Department of Health Services-certified laboratory for the analyses requested.
- f. Analyze water samples for the chemical constituents as described in this section or in accordance with the monitoring program established for the site by the lead agency. For contaminants not listed, contact the lead agency.

2. Reporting

a. Graphic Presentation

Include site maps (plot plans) that are drawn to a scale that remains constant from reporting period to reporting period. These maps must include the following information.

- (1) Potential contaminant sources
- (2) Well locations
- (3) Groundwater elevation contours
- (4) Groundwater flow direction(s)
- (5) Extent of NAPL
- (6) Extent of dissolved chemical constituents
- (7) Selected analytical results

Line or bar graphs are helpful when illustrating variations in groundwater elevations, NAPL thickness, and dissolved chemical concentrations with time. Cross sections are recommended if the previous interpretation of subsurface conditions has changed.

b. Tabular Presentation

Present all of the following data in one or more tables to show a chronological history and allow quick and easy reference.

- (1) Well designations
- (2) Well construction (including well casing elevation, total casing and screen length, and depth to top of screen)
- (3) Groundwater depths
- (4) Groundwater elevations
- (5) NAPL elevations
- (6) NAPL thickness
- (7) Purge volumes
- (8) Analytical results (current as well as historical)
- (9) Measurement dates

c. Discussion

Provide a discussion of the field and laboratory results, which includes the following information:

- (1) Conclusions
- (2) Data anomalies
- (3) Variations from protocols
- (4) Conditions of wells, including vaults and seals
- (5) Management of drill cuttings and purge water
- (6) Trend analysis
- (7) Data interpretation
- (8) Recommendations

d. Appendices

Include the following information in appendices:

- (1) Complete analytical laboratory reports
- (2) Well purging and sampling documentation (including equipment used, date and time, and infield water quality measurement)
- (3) Decontamination procedures
- (4) Field QA/QC methods
- (5) Sample preservation
- (6) Documentation of quantities of product, well development and purge water, and drill cuttings recovered or generated during field activities, and documentation of their proper disposal or recycling (include copies of hazardous waste manifests and bills of lading)

VIII. RESIDUAL SATURATION

Soil and groundwater impacts may include the presence of NAPL. Depending on the physical properties of the contaminant, the NAPL may be lighter or denser than water. In general, contaminants such as fuels (e.g., TPH) have densities that are lower than water and are commonly referred to as LNAPL. Chlorinated hydrocarbons (CHCs) have densities that are higher than water and are commonly referred to as DNAPL.

NAPL can occur in the subsurface, partially or completely saturating pore or fracture spaces. Because of the low solubility of these chemicals, the presence of NAPL can be an ongoing source of

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groundwater contamination. To properly evaluate the long-term impacts of a release to groundwater, and the environmental risk, it is important to determine if NAPL is present. The presence or absence of NAPL in the subsurface will influence how the site is managed with respect to the selection of site characterization methods, consideration of appropriate remedial technologies, and development of a viable risk assessment. The San Diego RWQCB has provided some guidance on the data collection requirements for the evaluation of NAPL (Appendix E.V).

A. Evaluation and Determination of Residual Saturation

Initial site characterization data used to evaluate the presence of DNAPL include:

- Visual identification of chemical product in soil
- Visual identification of chemical product in wells or excavations
- Comparison of measured chemical concentrations in groundwater to equilibrium partitioning concentrations
- Comparison of measured chemical concentrations in soil to equilibrium partitioning concentrations
- Anomalous concentrations of chemicals in groundwater, soil, or soil vapor

NAPL characterization needs to include some or all of the following elements:

- Detailed characterization of site stratigraphy
- Determination of capillary properties of key lithologies
- Determination of NAPL chemical composition and fluid properties
- Estimation of NAPL mobility
- Estimation of residual NAPL distribution (horizontally and vertically)
- Estimation of NAPL volumes

The presence of NAPL is of significant concern because it has the potential to cause explosions and vapor problems, and/or be a continuous source of groundwater contamination. Additionally, these compounds can move through geologic materials as a NAPL, as dissolved components in water, or as vapors in soil pores.

As a general practice, the presence of NAPL in the subsurface has been investigated by using wells screened through the capillary fringe and the water table. The presence or lack of NAPL in wells or excavations is due to a number of site-specific conditions that may change with time. Typical conditions can include, but not be limited to, a fluctuating water table, residual NAPL saturation, and soil type. Due to these conditions, the use of wells to define the presence of NAPL has resulted in inconsistent and unreliable results.

The following guidance is provided to aid in determining if NAPL is present at the site in the unsaturated and saturated zones.

A percentage of a fluid that is introduced into a soil will be permanently captured within the porous structure of the soil and/or rock materials. This is due to surface tension characteristics and capillary forces. The maximum percentage by volume of the liquid retained after gravity drainage is the specific retention of that liquid for that specific soil. For liquids other than water, this is commonly called the **residual saturation**. Besides reporting residual saturation as a percentage or fraction of the pore space, it is also commonly reported by laboratories as mass of

the hydrocarbon per unit mass of soil (e.g., mg/kg, micrograms per liter [ug/kg], parts per million [ppm], parts per billion [ppb]).

Work by Hoag and Marley (1986), Huntley et al. (1994a,b), Melrose and Brander (1974), Mercer and Cohen (1990), Rathmell et al. (1973), and Tyler and Finley (1991) evaluated residual saturation for various NAPLs and soil/rock types. These researchers demonstrated that a significant fraction of NAPL would remain in soil after gravity drainage. Parker (1991) provides a modification of the Brooks-Corey relative permeability function (Equation 5-3, below) to estimate residual NAPL as a function of soil hydraulic conductivity and NAPL type. The equation assumes that below some critical threshold (qc), NAPL loses pore continuity and becomes trapped by soil capillary forces, and movement is considered insignificant:

$$S_{ro} = (1-S_{rw}) * [q_c \mu_{ro} / (\gamma_{ro} K_{swz})]^{0.25}$$
 Equation 5-3

Where: S_{ro} = the residual NAPL saturation (dimensionless)

 S_{rw} = the residual water (dimensionless)

 q_c = the critical flow rate (centimeters per second [cm/sec]) μ_{ro} = the relative NAPL viscosity to water (dimensionless) γ_{ro} = the relative NAPL specific gravity to water (dimensionless) K_{swz} = the vertical hydraulic conductivity of the soil (cm/sec)

N_{SWZ} = the vertical hydraune conductivity of the son (chibsee)

A more accurate method of determining the residual saturation for a specific soil on a site is a laboratory test method that uses the Dean Stark Method (API RP40) described in Section 5.VIII.D.

Since Equation 5-3 provides residual saturation as a percentage or fraction of the pore space, it needs to be converted to units of mass of the hydrocarbon per unit mass of soil (e.g., mg/kg and ug/kg). This conversion makes it possible to compare the estimated residual saturation to laboratory data for the site. Equation 5-4 should be used to complete this conversion.

Where: C_s = the concentration of compound in soil (mg/kg)

 S_{ro} = the residual NAPL saturation (dimensionless)

 ρ_{o} = the density of NAPL (gm/cm³) ρ_{w} = the density of water (gm/cm³)

 ρ_b = the dry bulk density of soil (gm/cm³) θ = the total soil porosity (dimensionless)

 $\theta_{\rm w}$ = the water filled porosity (dimensionless)

Equations 5-3 and 5-4 and conservative assumptions on soil type and petroleum-specific residual NAPL saturation were used to generate Table 5-3. DEH selected conservative saturated soil hydraulic conductivities, soil properties, and petroleum properties to provide the lowest expected residual saturation for a particular fuel and soil type. Other parameters such as the relative viscosity, μ_{ro} , and the specific gravity, γ_{ro} , are presented in Table 6-2(b) in Section 6. The water filled porosity, θ , is considered equal to the values for residual water, S_{rw} , presented in Table 5-8.

TABLE 5-8 Petroleum Residual NAPL Saturation Based on Soil Type in Sedimentary Environments

Soil Type ASTM-	Approx. Particle	K _{swz} (cm/sec)	θ	S _{rw} (dim)	ρ _b (gm/cm ³)	TPH Concentration (mg/kg)			
D2487	Size (mm)	(chirsee)	(dim)	(unii)	(gill/cill)	Gasoline / Naphtha (mg/kg)	Kerosene / JP-4 (mg/kg)	Diesel #2 (mg/kg)	Fuel Oil (mg/kg)
Gravel	76.2-4.75	100	0.30	0.001	2.00	560	780	1000	1400
Sandy Gravel	Based on % fines	5.0	0.36	0.005	1.86	1,500	2,100	2,800	3,800
M- Coarse Sand	4.75-0.425	1.0	0.37	0.007	1.83	2,300	3,200	4,400	5,900
Fine Sand	0.425- 0.074	0.5	0.38	0.009	1.81	2,900	4,000	5,400	7,300
Silty Sand	Based on % fines	0.05	0.41	0.018	1.76	5,600	7,800	10,000	14,000
Silt	0.074- 0.005	0.0005	0.48	0.10	1.65	19,000	27,000	36,000	49,000
Clay	<0.005	0.000005	0.56	0.39	1.56	44,000	61,000	82,000	110,000

^{1.} The critical flow rate (q_c) used to calculate the above values was 1 x 10⁻⁷ cm/sec. This table does not apply in fractured crystalline rock environments

NAPL characterization requires an approach that is distinctly different from dissolved-phase characterization because immiscible flow is controlled by parameters not addressed in a dissolved-phase assessment. These parameters include the fluid properties of the NAPL and the capillary properties of the porous media.

There are many ways to determine the presence of NAPL. A more detailed discussion of the following techniques can be found in Cohen (1993) and Pankow (1996).

^{2.} The TPH concentration values were determined by using Equations 5-3 and 5-4.

B. Visual Evidence

It is possible to identify NAPL visually in soil core samples. This is best accomplished when large quantities of NAPL have been spilled or when there is dark colored NAPL such as creosote. More often than not, identifying NAPL visually is difficult because the NAPL may be clear or present near the soil's residual saturation.

C. Field Testing

Field testing methods can greatly increase the probability of determining NAPL presence. Laboratory tests have indicated that NAPL could be identified 80 percent of the time by using UV fluorescence or the soil-water-dye shake test (Cohen, 1993). The following describes the different types of field test methods:

- <u>Ultraviolet Light (UV) Fluorescence</u>: UV examination of soil cores contaminated soil can identify some contaminants such as trichloroethene (TCE) and perchloroethene (PCE). Uncontaminated soil should also be examined as a control since some soil minerals also fluoresce.
- Soil-water Shake Tests: If NAPL is suspected in a portion of a soil core, a soil-water shake test can be performed by mixing a small volume of soil with an equal volume of water in a clear vial. The presence of DNAPL can be determined by examining the sides and bottom of the tube. To enhance the test, a small amount of hydrophobic dye such as Red Sudan IV or Oil Red O can be placed in the vial. The dye, which is soluble in NAPL compounds but insoluble in water, will cause the NAPL to change color.
- <u>Vapor Analysis</u>: If volatile organic compound (VOC) readings from a head-space analysis are on the order of 1,000 to 2,000 ppm, NAPL may be present.
- <u>Drilling Fluids</u>: The presence of NAPL in drilling fluids can be determined by visual examination of the fluid for sheen.
- <u>Soil Analytical Data</u>: If the soil sample results are at or above the chemical's residual saturation, NAPL may be present.
- Groundwater Analytical Data: The presence of NAPL can also be determined by evaluation of water quality analytical results. If a particular compound is present at concentrations on the order of 1 to 10 % of the chemical solubility, NAPL may be present.
- Observation of NAPL in Well or Excavation: LNAPL will be observed floating on top of
 the groundwater in the well, whereas DNAPL will be observed at the bottom of the well
 or excavation. Please refer to Cohen (1993) or Pankow (1996) for a more detailed
 discussion of this topic.

D. Laboratory Testing

Currently, neither the EPA nor the ASTM has specified laboratory methods for determining the mobility of NAPL. Since there are no prescribed methods outlined, the following methodology can be used to evaluate product mobility in soil for sites located within San Diego County. The data derived from this laboratory test can be used to assess the potential mobility of NAPL under in situ conditions.

The following are the recommended procedures for this method:

- 1. Conduct product mobility testing on soil samples that represent in situ conditions in terms of soil compaction, soil structure, and contaminant concentrations.
- 2. Visually examine the geologic formations and/or soil structure in road cuts or trenches on or near the site to verify in situ conditions.
- 3. Evaluate subsurface soils for the potential of "finger flow" movement of contaminants. "Finger flow" is present to a degree in most cases. In those cases where fine-grained soils overlay uniform clean sands and/or coarse-grained sands, "finger flow" may pose a significant problem, and a groundwater monitoring well may be required to evaluate potential impacts to groundwater.
- 4. For those soils that need to be re-compacted (e.g., because of cobbles,) make every effort to replicate the sample to in situ conditions.
- 5. Determine the residual saturation by using the following testing method: (Prior to collecting samples for this method contact your laboratory to determine sample size and preparation needed to complete the testing.)

The soil sample is placed in a temperature-controlled centrifuge and subjected to increasing rotational speeds from 50-5000 revolutions per minute (rpm). Each rotational speed is maintained up to 24 hours or until fluid production stabilizes before the speed is increased to the next step. Volumes of water and hydrocarbons produced are determined by using calibrated collection tubes. Values are recorded at each step. Following the final step, the sample is removed from the centrifuge and residual fluids are extracted (Dean-Stark Method; API RP40). At the completion of the test the following items should be reported:

- Initial hydrocarbon saturation (% and mg/kg)
- Residual hydrocarbon saturation (% and mg/kg)
- Fluid production vs. capillary pressure relationship
- Sample petrophysical properties: effective porosity (%), grain and bulk density (gm/cc)
- 6. Compare the measured residual saturation values to the highest TPH concentration from the site. If the site value is <u>less than</u> the laboratory residual saturation value, the contaminant is considered to be below residual saturation. This will indicate that the contaminant is not mobile as a NAPL. If the site value is <u>greater than</u> the laboratory value, the contaminant is above the residual saturation and may be mobile. This indicates further investigation and/or remediation is necessary.

7. Review subsequent guidance sections regarding evaluation of soil leachability and potential impacts to groundwater.

IX. SOIL LEACHABILITY

To estimate the leaching potential of impacted soil, one of the following laboratory testing methods for leachability of a particular soil can be used:

- **EPA Method 1312**, Synthetic Precipitation Leaching Procedure (SPLP)
- **ASTM Method D4874-95**, Leaching Solid Material in a Column Apparatus

These tests are intended to aid in determining the maximum concentration of a contaminant that may remain in soil without potentially leaching to groundwater. A leachability study is not appropriate in materials where transport is primarily through fractures or if fractures are suspected.

1. Soil Sampling

For the majority of situations, obtain a minimum of three samples from each predominantly impacted soil type or geologic unit. These samples should encompass the full range of contaminant concentrations. One of the samples must represent the highest concentration of soil contamination; this is commonly located in or near the source. If the soil type or geologic unit varies in texture and composition, additional samples will need to be taken and analyzed to evaluate the leachability of the contaminant.

2. Analysis of Soil and Leachate

The following table is provided for guidance on the analyses to be performed. The soil analysis must be completed prior to running the SPLP analysis. The SPLP method should not be used to analyze soil samples with non-detect concentrations.

Substance	<u>Soil</u>	SPLP Leachate
Gasoline	EPA-8020, 8021 or 8260	EPA-8020, 8021 or 8260
Diesel	EPA-8260and/or 8270	EPA-8260 and/or 8270
JP-4	EPA-8260 and/or 8270	EPA-8260 and/or 8270
Kerosene	EPA-8270	EPA-8270
MTBE	EPA-8260B	EPA-8260B
Waste Oil**	Case-by-case	Case-by-case
Solvents**	Case-by-case	Case-by-case

The specific analysis will be determined on a case-by-case basis. Selection of target compounds should be based on knowledge of the waste.

3. Leachate Testing Procedures

1. SPLP Testing (EPA Method 1312)

This method is a standard laboratory procedure designed to determine the leaching potential of organic and inorganic compounds present in soils and wastes. It provides a leachate for analysis from a disaggregated soil or waste sample. This method uses pH-adjusted deionized water for metals analysis, and deionized water for cyanide and organic compounds.

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2. Leaching Solid Material in a Column Apparatus (ASTM Method D4874-95)

This method is a standard laboratory procedure for generating aqueous leachate from soil using a column apparatus. It provides a leachate suitable for organic and inorganic analyses from samples that are undisturbed. This method is less aggressive than the SPLP procedures outlined above and is considered to be more representative of field conditions.

Since method detection limits (MDLs) for the target analyses will vary between analytical laboratories, it is important to acquire a sufficient volume of pore water to achieve detection limits down to the required action level.

To provide results that are more representative of in situ field conditions, this method should be modified as follows:

- a. Test only undisturbed samples to represent optimum field conditions of porosity, density, or moisture. Do not disaggregate and repack columns.
- b. Use a flexible sleeve column loaded to in situ confining pressures to prevent channeling. The laboratory should be notified of the depth of the sample so that the proper confining pressure can be maintained. The flexible sleeve should be of Teflon or other relatively inert material to prevent contamination of the leachate.

3. Data Interpretation

The sample results should be plotted on log-log graph paper. The soil results are plotted on the x-coordinate and the leachate results are plotted on the y-coordinate. Separate graphs should be made for each soil type or geologic unit.

The following example is provided to demonstrate the interpretation of benzene SPLP data.

EXAMPLE:

Three samples were obtained from a site in an area where groundwater was designated as having municipal and domestic uses. Torrey Sandstone, which was observed to be a light-brown, medium-grained, subangular, and moderately indurated arkosic sandstone, underlies the site. The following are the soil and SPLP results for benzene:

	<u>Soil</u>	<u>Leachate</u>
Sample 1	200 mg/kg	2,300 ug/l
Sample 2	82 mg/kg	80 ug/l
Sample 3	20 mg/kg	0.20 ug/l

Figure 5-1 is a graph of the data above. At the point on the plotted line where benzene is 1 ug/l in the leachate (the MCL for benzene), the corresponding benzene concentration in the soil sample is 30 mg/kg. Assuming no attenuation in the unsaturated zone, all soils greater than 30 mg/kg may impact groundwater in excess of the water quality goals for the area.

1000 1000 1000 1000 1000 Soil - Benzene (mg/kg)

Figure 5-1

Soil Concentration vs. Leachate Concentration

X. LABORATORY ANALYSIS

Analytical reports and QA/QC data packages prepared for submittal to DEH must be in accordance with the sampling and analysis plan for a specific program, either UST Removal or Initial Site Assessment for contamination characterization. The analyses shall be performed by an Environmental Laboratory Accreditation Program (ELAP) certified laboratory granted by California Department of Health Services (DHS). All analyses shall be performed in accordance with laboratory certification criteria and the CCR, Title 22. A copy of all relevant laboratory data must be submitted to DEH.

A. Required Analytical Methods

For UST removals, the analyses in Table 5-9 must be performed. For site assessment purposes, the analyses in Table 5-10 must be performed. Additional analyses may be required for treatment, remediation, transport, or disposal purposes. DHS-TPH analysis preparation methods for various fuels are provided in Table 5-11.

Note: For samples collected at the time of UST removal, copies of chromatograms may be submitted with the laboratory report for all TPH analyses by the DHS-TPH Method. These chromatograms will be qualitatively evaluated to help determine if further site assessment is needed.

TABLE 5-9: REQUIRED ANALYSES FOR UST REMOVALS ¹					
SUBSTANCE	COMPONENT	METHOD			
GASOLINE/DIESEL	Total Petroleum Hydrocarbons	EPA 8015B or			
	$(TPH C_6-C_{30})^2$	DHS-TPH Method			
	BTEX and VOCs	EPA 8021, 8260 or			
		8010 and 8020			
	MTBE	EPA 8260B			
WASTE OIL Total Recoverable Petroleum Hydrocarbons (TRPH)		EPA 418.1			
	BTEX and VOCs	EPA 8021, 8260B or 8010 and 8020			
	MTBE	EPA 8260B			
DRY CLEANING SUBSTANCE	Stoddard Solvent	EPA 8015B or DHS-TPH Method			
	PCE	EPA 8021, 8260B, 8010, or 8240			
OTHER	Submit a written plan to DEH with UST removal application	Various			

Analyses are most commonly performed on soil samples. Water samples in areas of shallow groundwater may be requested.

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Upon request, copies of chromatograms should be submitted on 8.5 x 11 format. These chromatograms will be used qualitatively to help determine if further site assessment is needed.

TABLE 5-10: LABORATORY ANALYSES FOR INITIAL CONTAMINANT CHARACTERIZATION

SUSPECTED SUBSTANCE	A. COMPONENT	B. METHOD
GASOLINE DIESEL	Total Petroleum Hydrocarbons (TPH) 1,4	EPA 8015B or DHS-TPH Method
JET A FUEL	Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) ^{2,4}	EPA 8021, 8260, 8020, or 8240,
	Volatile Organic Compounds ³	EPA 8021, 8260, 8020, or 8240
	Total Lead ^{2,3,4,7}	EPA 6010, 7420, or 7421
	Organic Lead (Soil Only) 3,5	DHS organic lead or EPA 3050 or 6010
	MTBE ^{2, 4}	EPA 8260B
	Other Oxygenates	EPA 8021 or 8260
	Polynuclear aromatics (PNAs) (Diesel Fuel)	EPA 8310 or 8270 ⁷
WASTE OIL	Total Recoverable Petroleum Hydrocarbons (TRPH)	EPA 418.1
	Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) ²	EPA 8021, 8260B, 8020 or 8240
	MTBE	EPA 8260B
	Chlorinated Hydrocarbons ²	EPA 8021, 8260, 8010, or 8240
	PCBs ³	EPA 8082 or 8080
	Title 22 Metals ^{2, 3}	EPA 7000 or 6010
	Total Lead ^{2, 3, 4, 7}	EPA 6010, 6020, 7420, or 7421
	Organic Lead (Soil Only) 2,3	DHS Method or EPA 3050/6010
KEROSENE, HEATING FUEL, BUNKER FUEL	Total Petroleum Hydrocarbons (TPH) 1.4	EPA 8015B or DHS-TPH Method
	PNAs ^{2,4}	EPA 8310 or 8270 ⁶
OTHER (e.g., plating facilities, agricultural sites)	Submit written plan to DEH	Various, per approved Workplan
DRY CLEANING	Stoddard Solvent	EPA 8015B or DHS-TPH Method
SUBSTANCES	Perchloroethylene (PCE)	EPA 8021, 8260, 8010, or 8240
	Carbon Tetrachloride ³	EPA 8021, 8260, 8010, or 8240
	Volatile Organic Compounds ³	EPA 8240 or 8260

The above analyses are for initial site characterization. Preliminary screening should be based on historical use, operational process, and nature of substance used at the site. Further analyses and monitoring of site activities will depend on the results of the characterization.

- The samples must be analyzed with an appropriate standard (Gas, Diesel, Jet Fuel, etc.) and the amount of **petroleum** hydrocarbons must be quantified between C_6 and C_{30} . Report all carbon ranges discovered.
- The number of samples to be analyzed must be based on specific site conditions. At a minimum, analysis of the sample with the highest TPH or TRPH concentration will be required.
- ³ A written justification for omitting this analysis may be submitted for consideration.
- ⁴ Analyze for every water sample collected.
- ⁵ Analyze on the highest TPH gasoline sample only.
- 6 Use Method 8310 PNA list of compounds only.
- If the Total Threshold Limit Value for lead is greater than 50 mg/kg, run the Soluble Threshold Limited Concentration test and screen for organic lead.

NOTE: DEH prefers the use of GC/MS methods during the initial sampling at the beginning of the site assessment process to identify the contaminants of concern. GC/Non-MS detector methods are preferred for sample analyses during continued assessment and remedial activities, and during confirmation and verification activities at the conclusion of site activities. These methods are preferable due to the increased sensitivity of their detection limit.

TABLE 5-11: PREPARATION METHODS				
SUSPECTED SUBSTANCE	TPH METHOD			
Gasoline, Diesel, Jet A Fuel, Kerosene	DHS-TPH Method; EPA 8015B using a solvent extraction; EPA 3510, 3540, or 3550 for diesel, Jet A fuel, and kerosene; and EPA 5030 purge and trap for gasoline followed by GC/FID ¹			
Gasoline only DHS-TPH Method, EPA 5030 using purge trap followed by GC/FID				
Diesel only	DHS-TPH Method, EPA 8015B using a solve extraction, or EPA 3510, 3540, or 3550 followed by GC/FID ¹			
Lead	EPA 3050/6010			
Stoddard Solvent	DHS-TPH Method, EPA 8015B using a solvent extraction, or EPA 3510, 3540, or 3550 followed by GC/FID ¹			

Laboratories may use extraction solvents that meet method QC guidelines such as carbon disulfide, methylene chloride, and pentane, as applicable. The procedure and solvent selected should be evaluated when considering the representativeness of analytical results.

The following information should be discussed with an analytical laboratory for analyses criteria not listed in this manual. Identify the substances or chemicals of concern, the breakdown products or components to be analyzed, and the recommended analysis methods. DEH will consider alternative analysis methods on a site-specific basis only. Alternative methodology should provide results that are as good and/or more representative than standard method results. Such alternative plans must be included in the scope of a corrective action workplan and submitted to DEH for review and approval. Written approval of such plans is required if the results will be submitted to DEH.

Analytical detection limits are presented in Table 5-12. It is recognized that high levels of contamination, dilution factors, or matrix interferences may result in higher detection limits. A written explanation should be provided to DEH upon request when the recommended minimum detection limits are exceeded. The detection limits used should not exceed the cleanup levels determined for the site. Unfortunately, neither DEH, nor environmental consultant, nor laboratory routinely knows these values prior to the site assessment activity. Therefore, use of these minimum detection limits is highly recommended. Analytical results will be evaluated in accordance with current technical information. For optimum representative results, consideration must be given to the method and extraction solvent selected.

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TABLE 5-12: DETECTION LIMIT REPORTING				
CONTAMINANT (Method Reference)	Matrix	Recommended Reporting Limit		
Gasoline, Diesel, Jet A Fuel (DHS-	Soil	10.0 mg/kg		
TPH or EPA 8015B)	Water	500 ug/l		
	Vapor	1 ug/l-vapor		
Benzene	Soil	0.05 mg/kg		
(EPA 8020, 8021, 8240, or 8260)	Water	0.5 ug/l		
	Vapor	1 ug/l-vapor		
m.1	Soil	0.05 mg/kg		
Toluene (EPA 8020, 8021, 8240, or 8260)	Water	0.5 ug/l		
(Er A 6020, 6021, 6240, 01 6200)	Vapor	1 ug/l-vapor		
	Soil	0.05 mg/kg per isomer		
Xylene		0.15 mg/kg isomer total		
(EPA 8020, 8021, 8240, or 8260)	Water	0.5 ug/l per isomer		
		1.5 ug/l isomer total		
	Vapor	1 ug/l-vapor		
Ethylbenzene	Soil	0.05 mg/kg		
(EPA 8020, 8021, 8240 or 8260)	Water	0.5 ug/l		
, , ,	Vapor	1 ug/l-vapor		
Volatile Organic Compounds (EPA 8240 and 8260)	Soil	5 ug/kg to 500 ug/kg depending on compound		
(======================================	Water	1 ug/l to 100 ug/l depending on compound		
	Vapor	1 ug/l-vapor		
Organic Lead (EPA 6010, 3050, or 7421)	Soil	0.5 mg/kg		
Total Lead (EPA 6010, 6020, 7420 or 7421)	Water	5 ug/l (primary MCL for drinking water)		
Total Recoverable Petroleum	Soil	10.0 mg/kg		
Hydrocarbons (EPA 418.1)	Water	500 ug/l		
MTBE (EPA 8260B)	Soil	0.01 mg/kg		
	Water	1 ug/l		
	Vapor	1 ug/l-vapor		
PNA/Naphthalene (EPA 8270 or	Soil	200-400 ug/kg		
8260) and PNA (EPA 8270 or 8310)	Water	10 ug/l		
	Vapor	1 ug/l-vapor		
PCBs/Pesticides (EPA 8080 8081, 8082, or 8270)	Soil	SW-846 requirements/estimated quantitation limits		
,,	Water			
Methane (EPA 8015 Mod)	Vapor	10 ppmv (0.001%)		

B. Laboratory Report

The complete laboratory report is typically attached as an appendix to the site assessment report. A summary table with field sample identifications, lab sample identifications, if different, and analytical results must be included in the main text of the site assessment report. All laboratory data submitted to DEH must include the following minimum information.

- 1. Site/job identification (e.g., site address, city)
- 2. Sample identification and laboratory identification

Official laboratory letterhead paper must be used. Mobile laboratories must indicate a "mobile laboratory" (or equivalent) and the location where analyses were performed.

3. Quality assurance and quality control (QA/QC) data

See Table E-1 in Appendix E.VIII.

- 4. Analysis method, extraction and preparation methods, units reported (e.g., mg/kg), and limits of detection
- 5. Copies of all analytical data
- 6. Submit a copy of the chromatogram of the highest concentration of each contaminant found in the initial site assessment report. For example, if the results indicate only gasoline is present, provide a copy of the chromatogram of the highest gasoline result detected. If the results indicate gasoline in some samples and a mixture of gasoline and diesel in other samples, submit at least two chromatograms.
- 7. Chain-of-custody and sample analysis request documents must be submitted with all laboratory analyses data reports. The analysis request may be reflected on the chain-of-custody document. Date of sample collection must be clearly noted on the chain-of-custody document.
- 8. Remarks as necessary (e.g., condition of sample, appropriate container, excess holding times)

See Table E-1 in Appendix E.VIII for additional information.

9. Analytical results are expected to be within the laboratory's control limits. Written explanation will be required for analyses outside of these limits.

Note: Additional information for some issues may be necessary. If DEH requires additional laboratory or analytical information not outlined in this manual, the request will be made in writing to the responsible party (RP).

C. Laboratory QA/QC Reporting

In the laboratory, quality assurance and quality control (QA/QC) are a set of protocols designed to verify and maintain a desired level of quality in the analytical process. QA/QC requires careful planning, continued inspection, and appropriate corrective action.

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The following information must be provided to DEH annually or as the information changes before laboratory data packages can be accepted from analytical laboratories.

- DHS/ELAP accreditation
- Summary of laboratory QA/QC information
- Laboratory control limits for the specified method
- Standard results/chromatograms for the specific method
- Sample laboratory report

Send the information to:

County of San Diego, DEH Site Assessment and Mitigation Attn: Laboratory Review P.O. Box 129261 San Diego, CA 92112-9261

Information submitted is for use of regulatory staff personnel. Copies of Standard Operating Procedures may be requested on an as needed basis. Consultants wanting to review this type of information must consult directly with the laboratory.

The QA/QC requirements for analyses submitted to DEH are summarized in Table E-1 of Appendix E.VIII.

D. Field QA/QC

QA/QC in field work refers to field procedures that can affect sample results and methods used to check the quality of field techniques. The purpose of this guideline is to describe acceptable quality check procedures for use in routine environmental investigations carried out in San Diego County that are evaluated by DEH.

This guideline does not present detailed field procedures; these will be found in other sections of this manual and in published handbooks (e.g., EPA SW-846, RCRA Technical Enforcement Guidance Document [TEGD], SWRCB LUFT Manual). It is assumed that field workers will use their best professional practices when collecting samples. (Note: Do not assume that the procedures in this guideline are suitable for unusual cases, or that they will be accepted by other regulatory agencies.)

E. Blanks

1. Trip Blank

A trip blank is a sample container of matrix material prepared in the lab, carried into the field, and returned to the lab with the samples without being opened. The purpose of the trip blank is to pick up any cross contamination between sample containers, and to show if the container or the preservative has added contamination to the sample. It must be the same type of container, from the same batch of containers, as is used to store the samples. It must be

prepared and sealed before arrival at the site. Preservation and packaging must match that of the field samples.

Trip blanks for water are straightforward to prepare and can be quite useful, since water cleanup levels are often close to the limits of analytical detection. One water trip blank for each unique combination of preservation and packaging should be carried during each groundwater-sampling event. The blank should be prepared with distilled water of known quality. Preparation must be done in an area free of airborne contamination.

Trip blanks for soil are difficult to prepare and of questionable value. The amount of contamination released from or adsorbed onto soil is dependent on the soil composition. Preparation of a functional soil blank requires detailed study of site soil characteristics. Therefore, no trip blank is necessary for soil.

To help avoid cross contamination during storage and transport, contaminated samples should be segregated from apparently clean samples, and water samples should be separated from soil samples. Blanks should travel with the clean(er) samples, since impact on those samples is more critical and detectable. Samples and blanks should be stored at the required temperature and preservatives used where required to prevent biologic degradation. These procedures are also to be followed even when mobile labs are utilized.

2. Equipment Blank

An equipment blank is prepared on site by passing clean matrix material through decontaminated or factory-sealed sampling equipment. The water used must be free of volatile organic contaminants. Presumably, this picks up contamination from the equipment, from the air, from the sample container, and through sample cross contamination during storage and transport.

An equipment blank is needed for water analysis. One water equipment blank should be prepared for each day of water sampling at a site; it should be prepared after sampling has been completed. No equipment blanks are needed for soil for the same reasons as for trip blanks. Some published protocols call for field blanks, which check for contamination via air at a sampling site. DEH does not consider these necessary for hydrocarbon investigations.

3. Analysis of Blanks

Analysis of blanks may or may not be needed. If some sample analysis results are "non-detect," inadvertent contamination is obviously not systematic and there is no need to analyze the blanks. If all samples are grossly contaminated and confirm field observations, analysis of the blanks is not needed. Analysis of blanks can be useful if:

- Unsuspected materials are detected in the samples,
- All samples yield nearly equal results, or
- Sample results are borderline for opening or closing a case.

Prompt consultation with DEH staff is essential if any of the above conditions are encountered. Blanks must be analyzed within the specified holding time. The decision on the need for blank analysis is the responsibility of the consultant and RP. If the quality of data is suspect and blank results have not been provided, DEH may require re-sampling. Results of blank analyses are not used to correct analytical values. Rather, they indicate a

need to find the source of the problem and to take corrective action, including re-sampling if necessary.

F. Duplicate Samples

Duplicates are samples taken in sequence to show natural variability. Closely spaced soil or rock samples are expected to have variable contaminant chemistry. This can be caused by abrupt changes in soil characteristics that influence the amount of contamination retained. Knowing where a sample comes from in the geologic framework of the site is more valuable than arbitrarily taking a second sample adjacent to the first.

Sequential groundwater samples will vary in chemistry. This is influenced by sample collection method, well purging method, and well recharge characteristics. Because no acceptable difference between duplicates can be specified, and because trends over time and space are used to evaluate the condition of a contaminated site, duplicates are not required.

G. Background Samples (Required If Background Contamination Suspected)

If background contamination is suspected, the contaminant needs to be quantified and confirmed as background. The consultant must defend any case of suspected background contamination. Background soil or rock samples must be in the same geological material as the contamination. Background water samples must be taken upgradient of, but close to, the contaminated area; they must be from the same water-bearing zone as the contaminated samples. (NOTE: In San Diego County, naturally occurring metals in soil, contaminated imported fill, and chlorinated solvents in groundwater have caused background problems.)

H. Containers, Preservation and Holding Time

Correct handling of samples is needed to eliminate bias and cross contamination prior to laboratory analysis. See EPA SW-846 for correct handling procedures.

XI. WASTE CHARACTERIZATION

Soil that is disturbed and accumulated at a contaminated site through excavation, drilling, or other means must be characterized to determine the concentration of any contaminants for proper disposition. Examples of stockpiled soil include:

- Excavated soil from a UST removal
- Excavated soil placed back into a UST pit
- Graded soil
- Soil cuttings from borings or well construction
- Imported clean soil mixed with contaminated soil

All stockpiled soil that is associated with an unauthorized release, spill, or other release, and that is not intended to be transported off-site or is to be transported to an unregulated site, must be sampled and analyzed in accordance with the following statistical procedure. This procedure provides a uniform approach for demonstrating the contaminant level within a uniform soil mass. Prior approval must be obtained from DEH and/or the RWQCB for off-site transport or reuse on-site of any soil associated with an unauthorized release, spill, or other release.

A. Sampling Protocol for Stockpiled Soil

- 1. Stockpiled soil that is designated for disposal to a permitted hazardous waste or specified waste facility, or to a treatment/recycling facility, must be sampled and analyzed in accordance with the receiving facility's requirements. These facilities may have different requirements than those presented below. Copies of all laboratory data and hazardous waste manifests, or other transportation documents generated for the soil treatment or disposal, must be submitted to DEH to demonstrate the proper handling and disposal of contaminated soil.
- 2. DEH will not accept composite soil samples for characterizing contaminated soil stockpiles. Only discrete samples will be accepted, because of the losses of volatile contaminants during sample handling and the dilution of non-volatile contaminants.
- 3. All stockpiled soil associated with an unauthorized release, spill, or other release that is not intended to be transported off site to a permitted facility, or has not been previously characterized through in situ sampling, must be sampled in accordance with the protocol outlined below. This protocol provides a uniform approach for demonstrating the contaminant level within a soil mass. Prior approval must be obtained from DEH and the RWQCB for off-site transport or reuse on-site of any soil associated with an unauthorized release, spill, or other release, including soil taken from areas of the site outside of the spill or release.
- 4. Procedures in EPA Publication SW-846 provide a method for determining the mean concentration of a given contaminant within a soil mass and the appropriate number of samples necessary to calculate this mean to within a specified confidence level. Initial sampling should generate a minimum number of samples/analyses as described below. Additional sample analyses may be required to meet the confidence levels given in SW846; therefore, archiving of samples may be appropriate. Archived samples must be appropriately preserved and analyzed within the maximum holding time specified in SW-846. The minimum number of discrete samples initially required is given below:
 - Stockpiles less than 10 cubic yards: a minimum of two (2) samples must be collected, one from each half of the stockpile. Select sample points randomly within each half.
 - Stockpiles from 10-20 cubic yards: a minimum of three (3) samples must be collected, one from each third of the stockpile. Select sample points randomly within each third.
 - Stockpiles from 20-100 cubic yards: a minimum of four (4) samples must be collected, one from each quarter of the stockpile. Select sample points randomly within each quarter.
 - Stockpiles from 100-500 cubic yards: a minimum of one (1) sample for each 25 cubic yards or portion must be collected (e.g., a 130-cubic yard stockpile would require 6 samples). Section the stockpile into 25 cubic yard portions and obtain a minimum of one (1) sample from each 25 cubic yard portion. Select sample points randomly within each 25 cubic yard portion of the stockpile.

- Stockpiles over 500 cubic yards: contact DEH for guidance on the minimum samples necessary.
- 5. Random sample points must be selected from locations on a three-dimensional grid. The presence of materials such as boulders, debris, etc., may make strict application of this requirement impractical. In such cases, it is appropriate to obtain the sample as close as possible to the randomly selected point without altering the spirit of the random selection process. For hydrocarbon contaminants, sample collection in either metal tubes or glass jars is acceptable, provided every effort is made to minimize the loss of volatile constituents. Metal tubes are preferred, since they will minimize aeration of the samples. Containers should be completely filled, capped, and placed on ice immediately.
- 6. Stockpiled soil is assumed to have a non-homogeneous distribution of contaminants. If a stockpile previously characterized by this protocol is split for any reason (such as to excise a portion expected to be highly contaminated from a non- or lesser-contaminated portion), the remaining mass must be re-sampled as a new stockpile per the previously described protocol to establish its mean contaminant concentration. Note that it is not necessary to consider each individual stockpile separately. At the discretion of the consultant, stockpiles expected to contain similar contaminant conditions can be considered part of the same soil mass for the purpose of SW-846 sampling.
- 7. Information on stockpiled soil evaluation must be submitted to DEH and must include the following:
 - An estimate of the volume of contaminated soil involved
 - A description of the contaminant (e.g., gasoline, diesel, aviation fuel)
 - A description of the sampling methodology and the sample location/selection process
 - A plot plan detailing the stockpile and sample locations
 - A copy of all sample results, chain of custody documents, and QA/QC supporting data
 - A one-page summary of the laboratory results for the stockpile sampling
 - Statistical calculations for all stockpiles greater than 20 cubic yards. Note: A Stockpile Statistics Worksheet (Table 5-13) and Tabulated Values of Students 't' (Table 5-14) are provided as an aid in completing these calculations.
 - A statement by the RP or by a registered professional (e.g., RG, RCE, Registered Environmental Health Specialist, or equivalent) certifying the level of contamination as determined using the SW-846 statistical process.
- 8. Data generated by field instrument methodologies such as photo-ionization and flame ionization detectors are not acceptable for quantifying contaminant concentrations.

B. Sampling Protocol for Containerized Soil

The RP or consultant often chooses to manage soil by placing it in containers (e.g., storage bins, 55-gallon drums) for security or aesthetic reasons. The characterization of soil placed in storage bins will typically follow the same sampling protocol as described above for stockpiled soil. However, the characterization of soil placed in drums may require the review of boring logs and site sampling/analytical data, as well as the collection of soil samples from selected drums. Please contact the DEH caseworker for specific direction concerning the characterization of soil stored in drums.

1	List sample results from laboratory		1	2	3
ı,	Analytical Method:	Name and American		5	6
	Units (e.g., mg/kg):	o sol annu que de la com-	7		9
2	Determine number of sample values	n	n=	1000	
3	Calculate sample mean with n = number of sample measurements	$\bar{x} = \frac{\sum_{i=1}^{n} x_i}{n}$	- - -		
4	Calculate sample variance	$s^{2} = \frac{\sum_{i=1}^{n} x_{i}^{2} - \frac{(\sum_{i=1}^{n} x_{i})^{2}}{n}}{n-1}$	S ² =		
5	Calculate sample standard deviation	$s = \sqrt{s^2}$	S=		
6	Calculate degrees of freedom	df = n-1	df=		
7	Calculate standard error of the mean	$s_{\bar{i}} = \frac{s}{\sqrt{n}}$	9%-		
В	Obtain student's t value corresponding to the degree of freedom value determined in #6 above	(See attached table of values on next page)	t ₂₀ =		
9	Calculate the confidence interval	$CI = \bar{x} + t_{20} s_{\bar{x}}$	Cl=		
0	Obtain regulatory threshold for the contaminant of concern	ат	RT=		
1	Calculate	$\Delta = RT - \bar{x}$	Δ=		
2	Estimate minimum number of samples	t_2 s2	n _{min} =		

¹ In accordance with the California Code of Regulations, Title 22, Section 66694, DEH follows the sampling guidelines set forth in *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, Third Edition,* US Environmental Protection Agency, 1986. This worksheet is based on information found in Volume II, Part III, Chapter 9 of "SW-846" and is provided as an aid for stockpile characterization. For circumstances requiring data manipulation beyond that indicated on the worksheet, refer to "SW-846."

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TABLE 5-14: TABULATED VALUES OF STUDENT'S 't' FOR EVALUATING SOLID WASTES		
Degrees of Freedom 1 df $(n-1)$	Tabulated value ² t.20 (80% confidence interval)	
1	3.078	
2	1.886	
3	1.638	
4	1.533	
5	1.476	
6	1.440	
7	1.415	
8	1.397	
9	1.393	
10	1.372	
11	1.363	
12	1.356	
13	1.350	
14	1.345	
15	1.341	
16	1.337	
17	1.333	
18	1.330	
19	1.328	
20	1.325	
21	1.323	
22	1.321	
23	1.319	
24	1.318	
25	1.316	
26	1.315	
27	1.314	
28	1.313	
29	1.311	
30	1.310	
40	1.303	
60	1.296	
120	1.289	

¹ Degrees of freedom (df) are equal to the number of samples (n) collected less one.

 $^{^2}$ Tabulated 't' values are for a two-tailed confidence interval and a probability of 0.20 (80% confidence level). The same values are applicable to a one-tailed confidence interval and a probability of 0.10 (90% confidence level).