Naval Facilities Engineering Command Hawaii
JBPHH HI

Draft

Hotel Pier Plume Delineation Work Plan Pearl Harbor Naval Supply Center

JOINT BASE PEARL HARBOR-HICKAM OAHU HI

PEARL HARBOR HI FISC SITE 29

October 2020

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Prepared for NAVFAC Hawaii by
AECOM Technical Services Inc
1001 Bishop Street Suite 1600
Honolulu HI 96813-3698

N62742-17-D-1800
CTO N6274220F0164

1. Title and Approval Page

Draft
Work Plan
October 2020

Hotel Pier Plume Delineation
Joint Base Pearl Harbor-Hickam

Prepared for:

Department of the Navy
Naval Facilities Engineering Command, Hawaii

Prepared for NAVFAC Hawaii by
AECOM Technical Services Inc
1001 Bishop Street Suite 1600
Honolulu HI 96813-3698

Prepared under:
Comprehensive Long-Term Environmental Action Navy
Contract Number N62742-17-D-1800, CTO N6274220F0164

NOTE – Will be signed upon final submission

AECOM CTO Manager: ______________________________
Robin Boyd Date

NOTE – Will be signed upon final submission

AECOM QA Program Manager: ______________________________
Scott Lewis Date

NOTE – Will be signed upon final submission

NAVFAC Hawaii RPM: ______________________________
Jeff Klein Date

EXECUTIVE SUMMARY

This work plan (WP) documents the proposed sampling and analysis program for a subsurface investigation to determine the boundary of the non-aqueous-phase liquid (NAPL) fuel plume at Remedial Action Area-1 (RAA-1), Hotel Pier, Pearl Harbor Naval Supply Center, Joint Base Pearl Harbor-Hickam, Oahu, Hawaii (Figure 1), and to develop recommendations to stop the discharge of NAPL to Halawa Stream.

Hotel Pier, the "Site", is approximately 0.6 acre and is situated along the northern border of the Halawa Geographic Study Area at the corner of [redacted] Hotel Pier has been used as a refueling hub since World War II for conventional refueling of large naval vessels. In July 1997, an estimated 1,500 to 3,500 gallons of diesel fuel leaked from a damaged fuel line at the [redacted] chamber and from a subsurface petroleum pipeline paralleling [redacted]. Previous investigations identified NAPL petroleum on the groundwater in the vicinity of [redacted] The NAPL plume (PPA-l) in the Hotel Pier Area has been termed RAA-1. Based on the 1997 Remedial Investigation report, the petroleum product was identified as weathered diesel fuel (Naval Distillate F-76) and residual oil (DON 1997c). Previous investigations identified the NAPL plume to be consistent with the locations of TPH impacts in soil and groundwater. The NAPL plume may have been in contact with the shoreline, releasing an estimated volume of 1.2 gallons per year to the surface waters of Pearl Harbor via Halawa Stream.

Subsequently, in 2001 a NAPL recovery system was installed approximately 300 feet to the southwest of the Site to address the subsurface plume. Liners were additionally installed in the storm drain system, and subsurface cutoff walls were constructed to prevent subsurface migration of the NAPL plume into Halawa Stream and Pearl Harbor. By 2006, the NAPL was reduced to a sheen and all NAPL recovery systems were removed, passive remediation was abandoned, and vaults 1 through 7 were demolished. Since NAPL was reduced to a sheen, the United States Department of the Navy (Navy) recommended ceasing passive remedial action operations at the Site but indicated that if NAPL thickness increased, the Site would be re-evaluated.

Currently, the Site is being used as a fuel pipeline manifold area. Fuel currently being transported in the pipelines includes jet fuel (F-24 and JP-5) and diesel fuel (F-76).

In March 2020, the Navy observed a "slow discharge of petroleum" into Halawa Stream from the Site at wharf H[redacted]. The rate of NAPL release was estimated to be approximately less than 10 milliliters per minute. The State of Hawaii Department of Health Hazard Evaluation and Emergency Response office collected a sample of NAPL from the ocean surface on September 2020. The State of Hawaii Department of Health reported that the NAPL resembled diesel, was "not very degraded," and had a dark brown color and petroleum odor. The Navy suspects that the release to the ocean is occurring at the seawall from a 4-inch diameter steel pipe oriented perpendicular to the seawall. The pipe end is submerged under the ocean surface at high tide. It was indicated that the Navy initially "plugged" the pipe, which reportedly slowed the release initially; however, the rate of release subsequently increased. The objective of this investigation is to develop recommendations to stop the discharge.

This WP summarizes the site history and describes the objectives, methods, and procedures proposed for this further investigation of the Hotel Pier Site.

In support of the project objective, the following field activities will be conducted:

1. Review available utility drawings for petroleum pipelines or petroleum storage tanks in the vicinity of the discharge. The utility drawings will also be reviewed for potential subsurface migration pathways such as trenches and backfill conduits.
2. The installation of soil borings in the area where NAPL was observed to discharge to Halawa Stream will be conducted for the delineation of the lateral and vertical extent of NAPL at the Site. Each boring will be continuously cored and a soil sample will be collected from the smear zone to determine the presence of petroleum NAPL.
3. Permanent groundwater monitoring wells will be installed from presumed upgradient and downgradient locations based on the lateral extent of NAPL contamination observed in the boreholes. These will be used to delineate mobile NAPL at the water table and quantify dissolved-phase chemicals of potential concern in groundwater.
4. NAPL samples will be collected (if sufficient NAPL is present) to compare against the RAA-1 subsurface petroleum plume composition to determine if the NAPL discharge may be associated with the RAA-1 plume or if the release is originating from a new source.
5. A section of a petroleum pipeline or storage structure which is believed to be releasing fuel into Halawa Stream will be excavated to determine if NAPL is present in the bedding material and to determine if it is a new release source and if the NAPL is migrating through the bedding material then discharging to surface water.

This WP incorporates a Tier II Sampling and Analysis Plan format. This format uses the flexibilities in the Uniform Federal Policy for Quality Assurance Project Plans policy (DoD 2005) to provide an effective and efficient process for smaller and less complex sites while ensuring that the quality assurance process effectively and efficiently reflects the goals of the project and intended use of the data (DON 2011). The Naval Facilities Engineering Command, Pacific Quality Assurance officer approved the use of the Tier II Sampling and Analysis Plan format for this contract task order.

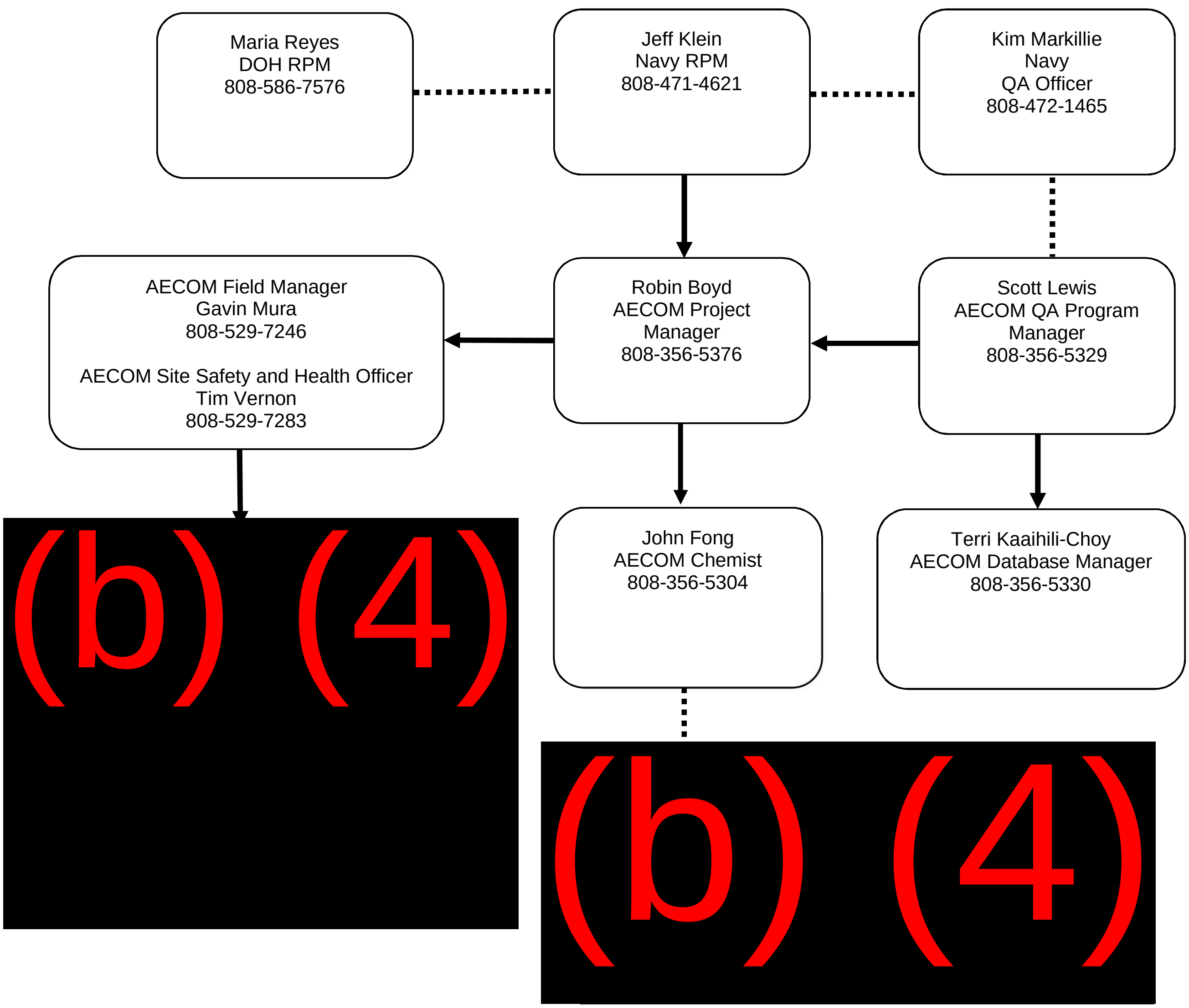
CONTENTS

ACRONYMS AND ABBREVIATIONS

°C	degree Celsius
AECOM	AECOM Technical Services, Inc.
AST	aboveground storage tank
bgs	below ground surface
Bldg.	building
COPC	chemical of potential concern
CSM	conceptual site model
DO	dissolved oxygen
DoD	Department of Defense
DOH	Department of Health, State of Hawaii
DPT	direct-push technology
EAL	environmental action level
EPA	Environmental Protection Agency, United States
ER	Environmental Restoration
FS	Feasibility Study
HSA	hollow-stem auger
ID	identification
IDW	investigation-derived waste
JBPHH	Joint Base Pearl Harbor-Hickam
msl	mean sea level
NAPL	non-aqueous-phase liquid
NAVFAC	Naval Facilities Engineering Command
Navy	Department of the Navy, United States
PSL	project screening level
PSQ	principal study question
QA	quality assurance
QC	quality control
RAA-1	Remedial Action Area-1
RCRA	Resource Conservation and Recovery Act (42 U.S.C. s/s 321 et seq.)
RI	Remedial Investigation
SSHO	site safety and health officer
TPH-DRO	total petroleum hydrocarbons-diesel range organics
TPH-LRO	total petroleum hydrocarbons-lube oil range organics
U.S.	United States
UST	underground storage tank
[redacted]	[redacted]
WP	work plan

2. Project Organizational Chart

Lines of Authority ———— Lines of Communication ················



3. Communication Pathways

The communication pathways for the WP are shown below.

Communication Driver	Responsible Entity	Name	Phone Number	Procedure
Regulatory Agency Interface	Navy RPM	Jeff Klein	808-471-4621	All project documentation will be forwarded by the Navy RPM. The Navy will be responsible for notifying DOH when significant corrective actions or changes occur.
Project Management	AECOM CTO Manager	Robin Boyd	808-356-5376	The AECOM CTO manager will direct and approve all communication to the Navy's RPM and provide monthly status reports to the NAVFAC contracting officer.
QA/QC Management	AECOM QA Program Manager	Scott Lewis	808-356-5329	The AECOM QA program manager will designate responsible project quality personnel to perform specified QA and QC activities and report to project and program management. Issues and non-conformances, and corrective actions will be reported to NAVFAC Pacific QA manager within 1 day of non-conformance issuance.
Field Progress Reports	AECOM Field Manager	Gavin Mura	808-529-7246	The AECOM field manager will communicate relevant field information to the CTO manager and AECOM project chemist daily during field activities, by phone or e-mail.
Stop Work Due to Safety Issues	AECOM SSHO (onsite) or AECOM Field Manager	Tim Vernon or Gavin Mura	808-529-7283 or 808-529-7246	The AECOM SSHO will communicate with the AECOM field manager and both will have the authority to stop work by field subcontractors or field sampling personnel. Field work will then restart upon satisfactory implementation of the appropriate corrective actions.
WP Changes Prior to Field/Laboratory work	AECOM CTO Manager	Robin Boyd	808-356-5376	Substantial changes to the planning documents will require the AECOM CTO manager prepare amended worksheets before the activities begin.
WP Changes in the Field	AECOM Field Manager	Gavin Mura	808-529-7246	The AECOM field manager will notify the project manager of changes to the procedures specified in the WP during field activities. The AECOM CTO manager will determine the appropriate course of action and document these changes in the investigation report.
Field Corrective Actions	AECOM Field Manager	Gavin Mura	808-529-7246	The AECOM field manager will have the authority to stop work and issue corrective response actions to field sampling personnel. Modes of communications will be by telephone or e-mail within 24 hours.
Daily Chain-of-Custody Reports and Shipping Documentation	AECOM Field QC Coordinator	Bianca Mintz	808-954-4546	Chain-of-Custodies and shipping records will be submitted via fax or e-mail to the AECOM project chemist at the end of each day that samples are collected.
Sample Receipt Variances	Laboratory Project Manager	Elaine Walker	253-248-4972	All variances in sample receipt will be reported to the AECOM project chemist by the laboratory within 24 hours of variance. A signed copy of the Chain-of-Custodies and a completed Sample Condition Report will be provided to the project chemist within 24 hours of sample receipt.
Reporting Laboratory Data Quality Issues	Laboratory Project Manager	Elaine Walker	253-248-4972	QA/QC issues that potentially affect data usability will be reported by the laboratory project manager to the project chemist by e-mail within 1 business day. If significant problems are identified from the laboratory that impacts the usability of the data, the project chemist will inform the Navy Project Manager within 1 day of notification.
	Navy Project Manager	Jeff Klein	808-471-4621	If significant problems with the laboratory are identified, the Navy project manager will inform the Navy Quality Assurance Manager for evaluation to determine what corrective actions will be taken with respect to the accreditation process.
Reporting Lab Quality Variances	Laboratory Project Manager	Elaine Walker	253-248-4972	All laboratory QA/QC variance issues will be reported to AECOM project chemist by the laboratory within 1 day of variance. The variance(s) will be reported to the AECOM CTO manager the same business day and to the Navy within 2 business days.

Communication Driver	Responsible Entity	Name	Phone Number	Procedure
Analytical Corrective Actions	AECOM Project Chemist	John Fong	808-356-5304	The AECOM project chemist will immediately notify the AECOM CTO manager and the laboratory project manager by e-mail of field or analytical procedures that were not performed in accordance with the planning documents. The AECOM project chemist will document the non-conformance and issue the corrective actions to be taken and will verify implementation of the corrective actions by the laboratory.
Analytical Data Review Corrective Actions	AECOM Analytical Data Review Advisor	Terri Kaaihili-Choy	808-356-5330	The AECOM analytical data review advisor will have the authority to issue corrective response actions to the laboratory. Corrective actions may be issued to the laboratory as a result of internal data review. Modes of communications will be by telephone or e-mail within 24 hours after audit.

AECOM AECOM Technical Services, Inc.
CTO contract task order
DOH Department of Health, State of Hawaii
EPA Environmental Protection Agency, United States
Navy Department of the Navy, United States
NAVFAC Naval Facilities Engineering Command
QA quality assurance
QC quality control
RPM remedial project manager
SSHO site safety and health officer
WP work plan

4. Project Planning Session Participants Sheet

Project Name: CTO N6274220F0164 Site Name: SITE 29
Projected Date(s) of Sampling: January 2021 Site Location: Joint Base Pearl Harbor-Hickam (JBPHH)
Project Manager: Robin Boyd
Date of Session: August 27, 2020
Scoping Session Purpose: Project kick-off meeting

Name	Project Role	Affiliation	Phone Number	E-mail Address
Jeff Klein	RPM	Navy	808-471-4621	john.j.klein1@navy.mil
Jan Kotoshirodo	RPM	Navy	808-471-4615	jan.kotoshirodo@navy.mil
Robin Boyd	CTO Manager	AECOM	808-356-5376	robin.boyd@aecom.com
Dustin Goto	Deputy CTO Manager	AECOM	808-356-5345	dustin.goto@aecom.com
Mark Hofferbert	Senior Engineer	AECOM	808-356-5317	mark.hofferbert@aecom.com

JBPHH Joint Base Pearl Harbor-Hickam
RPM remedial project manager

Comments/Decisions: A kick-off meeting was held to discuss the project objectives, scope, proposed field activities, and project schedule.

Action Items: The United States (U.S.) Department of the Navy (Navy) will determine Site access requirements for contractors, ask Navy Supply Systems Command for utility maps, provide previously completed boring logs at the Site to AECOM Technical Services, Inc. (AECOM), and provide AECOM with points-of-contact to coordinate with prior to the field work. AECOM will revise the project schedule with expedited durations.

Consensus Decisions: The project objectives are to determine whether the Remedial Action Area-1 (RAA-1) subsurface fuel plume is leaking into Halawa Stream and make recommendations for a permanent solution to stop the leakage. The meeting participants agreed that expediting the project schedule is necessary due to the ongoing nature of the release.

5. Conceptual Site Model

This work plan (WP) documents the proposed sampling and analysis program to propose a means to arrest the discharge of non-aqueous-phase liquid (NAPL) to surface water. The Hotel Pier Site ("the Site") is located at Joint Base Pearl Harbor-Hickam, Oahu, Hawaii (Figure 1).

This WP incorporates a Tier II Sampling and Analysis Plan format. This format uses the flexibilities in Uniform Federal Policy for Quality Assurance Project Plans policy (DoD 2005) to provide an effective and efficient process for smaller and less complex sites while ensuring that the quality assurance (QA) process effectively and efficiently reflects the goals of the project and intended use of the data (DON 2011). The Naval Facilities Engineering Command (NAVFAC) Pacific QA officer approved the use of the Tier II Sampling and Analysis Plan format for this contract task order.

5.1 SITE DESCRIPTION, HISTORY, AND ENVIRONMENTAL SETTING

5.1.1 Site Description

The approximately 0.6-acre Site is located along the north border of the Halawa Geographic Study Area at the corner of [redacted] (Figure 1). The Site is currently used as a petroleum pipeline manifold area, where several underground pipelines daylight. The aboveground portions of the pipeline in the manifold area are underlain by concrete pavement with containment curbing. The remainder of the ground surface at the Site is unpaved. Fuel currently being transported in the pipelines include jet fuel (F-24 and JP-5) and diesel fuel (F-76).

The Site is bordered by Halawa Stream and Pearl Harbor to the north, northeast, northwest, and west; the shore end of Hotel Pier to the southwest; [redacted] to the south; and a driveway to the east. The northeast (wharf H-[redacted]) and northwest (wharf H-[redacted]) borders of the Site adjoining Halawa Stream and Pearl Harbor, respectively, comprise a concrete sea wall approximately 3-5 feet above the water surface depending on the tidal stage. The top of the wall is at the same elevation as the Site. A chain-link fence with privacy slats borders the land-facing sides of the Site and the side of the Site facing the Pearl Harbor Visitor Center across Halawa Stream.

In March 2020, the Navy observed a "slow discharge of petroleum" into Halawa Stream from wharf H-[redacted] at the Site (Figure 1). An oil containment boom and sorbents were installed to contain the surface water NAPL and prevent it from migrating. The NAPL has a dark brown color and a petroleum odor. The Navy suspects the release to the ocean at the seawall is occurring from a 4-inch diameter steel pipe oriented perpendicular to the seawall. The pipe end is submerged under the ocean surface at high tide. The Navy initially abandoned the pipe by plugging it, which reportedly slowed the release rate initially; however, the rate of release subsequently appeared to increase based on visual observations therefore necessitating more frequent change-outs of sorbent material. As of September 2020, the rate of discharge was visually estimated to approximately 20 gallons per day.

The State of Hawaii Department of Health (DOH) Hazard Evaluation and Emergency Response office collected a sample of the NAPL from the ocean surface on September 2, 2020, for analysis by the DOH's internal laboratory. The DOH reported that the NAPL resembles diesel and indicated that the DOH chemist "described it as being not very degraded" (personal communication with Adam Teekell, DOH, September 3, 2020).

In September 2020, the Navy excavated an area between the pipeline manifold and the discharge location into Pearl Harbor and determined that the 4-inch plugged pipe did not appear to be the source of the NAPL discharging to Halawa Stream.

The origin of the NAPL release is currently unknown.

5.1.2 Site History

Hotel Pier has been in service since World War II for the refueling of large naval vessels. The Site, along with the area currently under [redacted] has historically been used to convey petroleum fuel to the pier through subsurface pipelines and other structures. Current or former petroleum storage or conveyance structures at the Site include:

- Two former underground storage tanks (USTs) (H[redacted]-1A and H[redacted]-2A) that were located at the Site. The steel USTs, 5,000 gallons each and used to store JP-5 fuel, were installed in 1943 and taken out of service in 1988 (DON 2003). The USTs were removed in 1997 (DON 1997a).
- [redacted] ([redacted] which is a valve pit containing valves for diesel, JP-5, and gasoline pipelines (DON 2003).
- Former aboveground storage tank (AST) 451, which was installed in 1997 and had a capacity of 5,200 gallons (DON 2003). The AST was used to store diesel fuel. The removal date of the AST is unknown.
- Former Bldg. 408, existing Bldg. 499, and former Bldg. 1541 identified as a diesel fuel pumping station, a pipeline shelter, and a former pumping station, respectively (DON 2003). The locations of existing Bldg. 499 and former Bldg. 1541 are illustrated on Figure 2. The location of former Bldg. 408 is unknown.

5.1.3 Previous Investigations

The previous investigation of releases from petroleum conveyance and storage structures in the vicinity of Hotel Pier are summarized chronologically below.

Event	Date
RI/FS for Subsurface Fuel Investigation, Naval Base (NAVBASE) Pearl Harbor, Hawaii (DON 1997b). The 1997 RI/FS identified a subsurface petroleum non-aqueous-phase liquid (NAPL) plume in a parallel orientation to [redacted] (Figure 2). Based on observable NAPL in only two monitoring wells, the RI/FS estimated the plume to be approximately 500 feet long and 120 feet wide. The northern border of the plume was illustrated to be approximately 100 feet to the southwest of the current NAPL release into Halawa Stream at wharf H[redacted]. VC-[redacted] and subsurface petroleum pipelines that run parallel to [redacted] were considered the most likely sources of the release. The RI/FS reported the petroleum NAPL plume consisted of a mixture of weathered diesel fuel (Naval Distillate F-76) and residual oil. The initial estimate of the volume released was 127,000 gallons, although the mobile volume was only estimated to be 26 gallons. The RI/FS recommended a removal action to prevent further migration of NAPL into Pearl Harbor.	1997
Engineering Evaluation/Cost Analysis, Removal Action at the Hotel Pier Site, Fleet & Industrial Supply Center, Pearl Harbor Naval Complex, Oahu, Hawaii (DON 1999). Between January and April 1999, an RSE was conducted and the results were presented in the November 1999 Engineering Evaluation/Cost Analysis (EE/CA) report (DON 1999). The main objectives of the RSE were to further evaluate the characteristics, sources, and migration pathways of the subsurface NAPL plume. As part of the RSE, 10 additional soil borings were advanced to investigate high to very-high resistive anomalies. The EE/CA recommended to either (a) repair the storm drain system; install collection sumps, cutoff walls, and skimming equipment at each storm drain system outfall; and install a series of collection sumps and skimming equipment or (b) repair the storm drain system; install collection sumps, cutoff walls, and skimming equipment at each storm drain system outfall; install a containment and extraction trench (including sumps and skimming equipment) and excavate additional soil between the harbor and the trench.	1999
Action Memorandum (AM): Non-Time Critical Removal Action at Hotel Pier (DON 1999). The 1999 AM identified two remedial action objectives for the Site: (1) prevent the migration of the NAPL plume and prevent subsurface flow into Pearl Harbor, and (2) recover/extract NAPL to minimize the potential for a release to Pearl Harbor and limit further migration of the NAPL plume.	1999
The remedial action was implemented in 2001 and included: • Installation of liners, collection sumps, skimming equipment, and cutoff walls in the storm drain. • Construction of a NAPL recovery system – 10 collection sumps fitted with belt skimmers and individual reservoirs mounted within concrete vaults, a central UST to collect recovered NAPL, and an AST.	2001
The NAPL recovery system was deactivated incrementally between 2002 through 2006 due to the lack of NAPL recovery. In 2006, the DOH concurred with the Navy that removal of the belt skimming systems and abandonment of collection sumps were appropriate (DON 2012).	2002-2006
Environmental Hazard Evaluation/Management Plans for Subsurface Fuel Remedial Action Areas (RAA-1 through RAA-10), Halawa-Main Gate Geographic Study Area (DON 2009). An EHE/EHMP was completed for RAA-1. The report recommended conducting low-tide NAPL thickness measurements and the implementation of administrative boundaries to address the potential environmental hazards due to exposure to soil and groundwater at RAA-1. The Site is identified within an administrative boundary that was proposed for an area exceeding the direct exposure and gross contamination EALs due to TPH concentrations greater than 1,000 mg/kg in soil.	2009
The DOH issued a “no further action with institutional controls” determination for RAA-1. The letter indicated the Navy would be required to conduct periodic low-tide NAPL gauging measurements and implement institutional controls to ensure potential receptors are protected from gross contamination and direct exposure hazards to COCs in soil.	June 2, 2009
Following the DOH determination, 13 gauging events were conducted. Events were performed semi-annually between 2009 and 2013 and annually from 2014-2017. The last completed event (September 2017) indicated that NAPL was either no longer detected, a sheen, or significantly reduced (DON 2017)(Figure 2). The greatest NAPL thickness measured was 2.4 inches. The monitoring report recommended continuation of gauging every five years (next event to take place in September 2022).	2009-2017

AST aboveground storage tank
COC chemical of concern
EAL environmental action level
mg/kg milligram per kilogram
NAPL non-aqueous-phase liquid
EHE environmental hazard evaluation
EHMP environmental hazard management plan
RAA-1 remedial action area-1
RI/FS Remedial Investigation/Feasibility Study
RSE removal site evaluation
TPH total petroleum hydrocarbons

5.1.4 Topography and Surface Water Drainage Patterns

The Site is at an elevation of approximately 5 feet above mean sea level (msl). The majority of the Site is unpaved. Storm water that does not infiltrate into the ground is expected to flow into Halawa Stream and Pearl Harbor, which adjoin the Site to the north and west, respectively. Significant storm water flow onto the Site from offsite locations is not expected.

5.1.5 Geology and Soils

The geologic units of Oahu consist primarily of basaltic volcanic bedrock (lava) and volcanic alluvium derived from either the Koolau or Waianae volcanoes. Sedimentary deposits, referred to locally as caprock, have developed along the coastal plains and overlie the basaltic bedrock. These deposits comprise fossil coral reef limestone, lagoonal limestone, and calcareous beach sand deposits, with interbedded volcanically derived alluvial sediments. In the vicinity of Pearl Harbor, the coastal caprock forms a shelf roughly 6 miles wide at its broadest point, overlying Koolau bedrock.

The Site consists of reclaimed land constructed during World War II. Based on borings completed during the 2007 Remedial Investigation (RI)/Feasibility Study (FS), the lithology of the Site consists of gravel fill present to approximately 5 feet below ground surface (bgs) (DON 1997b). The fill was described as “clayey to sandy dark brown to black with sub angular basalt and coral fragments and sand.” Underlying the fill material are native silty to clayey sands.

5.1.6 Groundwater Hydrogeology

Eight streams originating from seven watersheds of the Koolau Mountains discharge into Pearl Harbor. Two of these streams are intermittent, while the others are perennial. The perennial streams originate in the Koolau Range and constantly bring freshwater (and sediment) into Pearl Harbor. The JBPHH, Pearl Harbor Naval Shipyard & Intermediate Maintenance Facility, overlies the Honolulu-Pearl Harbor basal groundwater aquifer; the JBPHH, Pearl Harbor Naval Shipyard and Intermediate Maintenance Facility, is seaward of the underground injection control line delineated by the DOH and is, therefore, not considered a drinking water resource. As detailed in the *Classification of Shallow Caprock Groundwater at Navy Oahu Facilities, Oahu, Hawaii*, groundwater beneath the Site is classified as Class II non-potable (DON 2007) and, therefore, groundwater is not considered a drinking water resource.

Due to the Site’s proximity directly adjoining the ocean, the groundwater elevation at the Site is present at an approximate elevation of less than 1 foot above msl. Groundwater is expected to fluctuate with tidal influence and generally range between 4 and 6 feet bgs during high and low tides.

5.1.7 Vegetation and Wildlife

The Site and surrounding area consist of mostly industrial activities devoid of vegetation and wildlife. The few vegetated areas in the vicinity of the Site are limited to small landscaped areas. Four federally listed endemic (native) and endangered wading birds and waterfowl are associated with nearby wildlife refuges at Pearl Harbor Naval Complex. However, none of the wildlife refuges are in the vicinity of the Site.

Common fish in the refuges include the mullet (*Mugil sp.*) and the awa (*Chanos chanos*) (Nakai 1997). In the past, the quiet waters in the upper regions of all the Pearl Harbor lochs provided excellent habitat for the Hawaiian anchovy, “nehu” (*Encrasicholina purpurea*), a species used as a baitfish in the offshore tuna, “aku,” fishery. Pearl Harbor provided a primary harvesting area within the state and, for this reason, the Navy issued permits for insured commercial “aku” boats to collect baitfish from certain regions of Pearl Harbor (NCCOSC 1979). However, with the change in "aku" fishing methods from pole to longline, "nehu" fishing has essentially ceased within Pearl Harbor.

5.1.8 Land Use

The Site is currently used as a petroleum pipeline manifold area. Aside from workers occasionally accessing the Site to use or conduct maintenance on the aboveground portion of the fuel distribution system, the Site is not regularly occupied. Use of the Site for petroleum transport is not expected to change in the foreseeable future. Since the Site is within a secured fenced area, receptors, other than those occasionally accessing the Site for operation and maintenance of the pipeline, are not expected.

5.2 PRELIMINARY EXPOSURE ASSESSMENT

A conceptual site model (CSM) provides a roadmap to evaluate potential pathways for exposure to chemicals of potential concern (COPCs) and helps with designing an appropriate sampling and analysis program. By integrating relevant information with data representing components of an environmental system, a CSM presents a visual or graphical representation of a predicted relationship between ecological and human receptors and the chemical stressors to which they may be exposed (DON 2006; 2008; EPA 1989; 1998).

A complete exposure pathway consists of the following four elements:

- Chemical source (e.g., contaminated medium, such as subsurface soil or groundwater)
- Mechanism of release, retention, or transport of a chemical in a given medium (e.g., subsurface soil, groundwater)
- Point of human contact with the medium (i.e., exposure point)
- Route of exposure at the point of contact (e.g., incidental ingestion, dermal contact)

These four exposure pathway elements as they relate to the Site are further discussed in Sections 5.2.1, 5.2.2, and 5.2.3. To address the project objectives (i.e., determine whether the RAA-1 subsurface fuel plume at Hotel Pier is the source of the ongoing release into Halawa Stream and develop recommendations for an effective solution to address the on-going release), the focus of this section and the CSM are specific to the release of NAPL rather than aqueous COPCs. A separate investigation will be conducted to determine the nature and extent of the aqueous release.

5.2.1 Contaminant Release Mechanisms

As discussed in Section 5.1.1, NAPL appears to be discharging into Halawa Stream in the vicinity of a 4-inch diameter pipe at wharf H[redacted]. The pipe itself is considered a transport pathway but not the source of the NAPL. Potential sources of the NAPL release include: (1) the previously identified RAA-1 subsurface plume and (2) a new release source associated with the ongoing fuel operations at the Site. These two potential sources will be evaluated for their potential to represent the source of the release at wharf H[redacted]

5.2.2 Fate and Transport Considerations

Following a release of NAPL, subsurface migration occurs by seepage through the vadose zone under the influence of gravity, spreading over the water table, and finally stabilizing within the upper portion of the aquifer and capillary fringe. The amount of lateral spreading is controlled by the volume of the release, the viscosity and rate of release of NAPL, the permeability of the subsurface, and the degree of heterogeneity and anisotropy of subsurface soils. Once the source of the release is removed, the footprint of the plume stops expanding relatively quickly as the NAPL head dissipates. The two potential sources of petroleum NAPL release at wharf H-[redacted] are evaluated as follows:

- *RAA-1 subsurface NAPL plume:* The RAA-1 subsurface NAPL plume was initially mapped in 2007 greater than 100 feet to the southwest of the current release point at wharf H-[redacted] (DON 1997b), and NAPL extraction from 2001-2006 significantly reduced the NAPL body. During the last gauging event in 2017, the plume was mostly present as a sheen and measurable NAPL was only observed at two locations greater than 500 feet from the current release point at wharf H-[redacted] (DON 2017). It is very unlikely that the plume is still migrating because any head from the initial release that could be driving plume migration has dissipated. The RAA-1 subsurface NAPL plume is, therefore, not suspected to be the source of the current release at wharf H[redacted]
- *New release:* A new release source associated with leaking underground piping at the Site is suspected. A current ongoing release is presumed because the release of NAPL into the harbor has been occurring since March 2020 (i.e., head from an ongoing leak is driving the migration into the harbor) and a sample of the released NAPL floating in the harbor collected and analyzed by the DOH indicated that the NAPL was not weathered.

This project is designed to determine whether the NAPL discharged at wharf H-[redacted] is from the RAA-1 subsurface plume or is a new release source.

Processes such as volatilization, dissolution, sorption, and biodegradation may affect the persistence of a NAPL body, but only over a significant period (decades rather than years). Other factors such as proximity to the ocean (tidal influences) are expected to have a greater effect on mobility, absent a preferential pathway such as a pipe or permeable fill. Tidal oscillations in groundwater levels in near-shore areas result in a large smear zone. As NAPL migrates toward the shore and reaches the zone of tidally induced groundwater fluctuation, mobile NAPL will be smeared vertically within the water bearing formation. The rising water levels will displace NAPL in the soil pore spaces, resulting in a smear zone of isolated and disconnected NAPL droplets that are not mobile.

5.2.3 Exposure Pathways

While the origin of the NAPL discharging into Halawa Stream remains to be determined, it can be presumed that the release point is from a subsurface location because there is no evidence of NAPL on the ground surface. Furthermore, the discharge into Halawa Stream is occurring from the sidewall of the wharf H-[redacted] seawall (approximately 3 feet below the top of the seawall) rather than near the ground surface. Potential exposure pathways are briefly summarized below. The exposure pathways considered here are based on the environmental hazards used as the basis for the DOH environmental action levels (EALs).

- *Direct exposure:* As discussed in Section 5.2.3, the Site is currently used as a fuel pipeline manifold area and the only potential on-site receptors are workers doing operations and maintenance of the manifold system. Since there are no current activities at the Site involving excavation, which could expose workers to NAPL in the subsurface, direct exposure to NAPL on the land portion of the Site is considered unlikely. Direct exposure to NAPL within Halawa Stream is also considered unlikely because the containment boom is currently retaining the NAPL next to the wharf. There are no active human receptors using Halawa Stream or the adjoining Pearl Harbor area that could be exposed to floating NAPL.

- *Vapor intrusion:* Vapor intrusion is not considered an exposure concern because there are no buildings in the vicinity of the release and the petroleum products released (e.g., jet fuels and diesel fuel) are not significant volatile hazards.
- *Leaching (threat to groundwater):* COPCs from the subsurface NAPL are likely leaching into groundwater. The extent of the dissolved-phase groundwater impacts may require additional investigation.
- *Gross contamination (potential explosive hazards, odors, interference with construction work [soil reuse and disposal]):* The NAPL represents a gross contamination hazard due to odors and because any hypothetical construction activities involving excavation would need to address the handling of petroleum-impacted soil. Based on the initial assumption that the NAPL is originating from a new release source, explosive hazards are not presumed because an explosive atmosphere would likely only develop after a significant period (i.e., methane generation due to naturally occurring microbial degradation of the petroleum does not occur immediately).
- *Aquatic ecotoxicity:* The discharge of NAPL to Halawa Stream may be resulting in an aquatic ecotoxicity hazard. Direct exposure impacts to aquatic organisms are considered minimal because the NAPL lighter than water is being retained directly next to the wharf by a floating containment boom.

6. Project Quality Objectives/Systematic Planning Process Statements

6.1 Step 1 – State the Problem

NAPL floating on the surface of Halawa Stream and Pearl Harbor due to the ongoing release represents a direct exposure and gross contamination hazard. The NAPL is discharging into the stream from the seawall adjoining a petroleum pipeline manifold area adjacent to Hotel Pier. The origin of the NAPL is unknown and requires investigation to evaluate appropriate response actions to permanently stop the release.

6.2 Step 2 – Identify the Study Goals

The overall objective of the investigation is to develop a recommendation to arrest the discharge of NAPL to Halawa Stream. These objectives do not include determining the nature and extent of petroleum NAPL impacts or the evaluation of environmental hazards to potential receptors.

The intended use of the data to be collected is considered an "estimation problem" rather than a "decision-making problem". In accordance with the *Guidance on Systematic Planning Using the Data Quality Objectives Process, EPA QA-G4* (EPA 2006), the systematic planning process outlined in this section is based on an estimation problem approach.

The principal study questions (PSQs) of this project are listed below, along with each question's range of possible outcomes and estimation statement:

- *PSQ #1:* What is the extent of NAPL in the subsurface?
  - *Possible outcomes:* The lateral extent of the subsurface NAPL plume ranges from the release source to wharf H-[redacted]
  - *Estimation statement:* The principal estimation measure will be observations of NAPL in soil borings drilled radially outward from the discharge point at wharf H-[redacted] and gauging results from monitoring wells.
- *PSQ #2:* What type of fuel has been released?
  - *Possible outcomes:* The release is likely associated with the petroleum pipeline manifold currently operating at the Site (jet fuels F-24 and JP-5 and diesel fuel F-76), or the RAA-1 subsurface plume (weathered diesel F-76 and residual oil).
  - *Estimation statement:* The principal estimation measure will be the results of fuel fingerprint analysis of NAPL collected from the surface of Halawa Stream and below the ground surface.
- *PSQ #3:* What is the pathway in which NAPL is migrating to surface water?
  - *Possible outcomes:* The NAPL is migrating to the discharge point through a preferential pathway (e.g., within a pipe, bedding material under a pipe) or through lateral spreading at the water table.
  - *Estimation statement:* The principal estimation measures include information gathered during a review of utility drawings for possible preferential pathways, and the results from the excavation of a trench to visually observe the subsurface for evidence of the NAPL pathway.

- *PSQ #4:* What is the source of the release?
  - *Possible outcomes:* The source of the NAPL discharge is the result of the RAA-1 subsurface plume or is the result of a new release (i.e., a leaking fuel pipelines).
  - *Estimation statement:* The principal estimation measures include the results of pressure testing petroleum pipelines at the Site, the results of fuel fingerprint analysis of NAPL in Halawa Stream and below the ground surface, and visual observations made during excavation of a trench at the suspected release location.

6.3 STEP 3 – IDENTIFY THE INFORMATION INPUTS TO THE DECISION

The following data will be acquired during the project to answer the PSQs:

- Results of previous investigations that delineated the RAA-1 subsurface NAPL plume will be considered, including the 1997 RI/FS, the 2014 Environmental Hazard Evaluation/Environmental Hazard Management Plan, and long-term NAPL gauging events conducted between 2009 and 2017.
- Field observations (i.e., evidence of NAPL including mobile NAPL, staining, and odors) during excavation of an on-site pipe suspected to be a transport pathway for the NAPL.
- Field observations (i.e., evidence of NAPL including mobile NAPL, staining, and odors) and analytical soil sampling results (TPH-DRO [total petroleum hydrocarbons-diesel range organics] and TPH-LRO [total petroleum hydrocarbons-lube oil range organics]) from a series of cored soil borings conducted in the vicinity of the Halawa Stream discharge location and on-site pipe suspected to be a transport pathway of NAPL. TPH-DRO and TPH-LRO soil sample results will be compared against the project screening levels listed in Table 6-1.
- NAPL gauging results and groundwater sampling results in monitoring wells installed on-site. Groundwater samples will be analyzed for TPH-DRO and TPH-LRO. Analytical results will be compared to previous results and against the project screening levels listed in Table 6-1. Note that because this is an estimation problem, the comparison of results with project screening levels will not be used for decision-making purposes but only to estimate the extent of NAPL impact.
- NAPL sample results to determine the fuel type and weathering.
- Available as built and utility maps for information relevant to NAPL sources (i.e., tanks and pipelines) and potential migration pathways.

Table 6-1: Summary of PSLs

	Action Levels		
Sample Medium	Criteria	Referenced Table	Referenced Date
Soil	DOH Tier 1 EALs for non-drinking water source, <150 meters from surface water body	DOH EAL Table B-2	Fall 2017 (DOH 2017a)
Groundwater	DOH Tier 1 EALs for non-drinking water source, <150 meters from surface water body	DOH EAL Table D-1c	Fall 2017 (DOH 2017a)

EAL environmental action level
PSL project screening level

6.4 STEP 4 – DEFINE THE BOUNDARIES OF THE STUDY

The physical horizontal boundaries of the study area are assumed (until further delineation) to be approximately 0.6 acre, including the Hotel Pier pipeline manifold area and an adjoining area to the east (Figure 1).

The vertical boundary of the study extends from the ground surface to approximately 15 feet bgs (i.e., the maximum depth that monitoring wells may be screened to). Groundwater is present at approximately 3 to 5 feet bgs.

The temporal boundaries of the RI Addendum field investigation are from January to March 2021.

6.5 STEP 5 – DEVELOP THE ANALYTIC APPROACH

The objective of this section is to identify the estimator for each PSQ.

- *PSQ #1:* What is the extent of NAPL in the subsurface?
  - The Navy will evaluate the extent of NAPL in the subsurface through observations of up to 10 soil borings radiating outward from the discharge location at wharf H[redacted]. The Navy will install two permanent groundwater monitoring wells to delineate mobile NAPL at the water table and quantify dissolved-phase COPCs.
- *PSQ #2:* What type of fuel has been released?
  - The Navy will evaluate the type of fuel released by collecting samples of NAPL floating in Halawa Stream and NAPL observed below the ground surface. The samples will be analyzed for fuel fingerprinting analysis to determine the fuel type.
- *PSQ #3:* What is the pathway in which NAPL is migrating to surface water?
  - The Navy will review utility drawings for possible preferential pathways. Based on the utility drawings and the results of the soil borings indicating the extent of the plume, the Navy will excavate a trench to visually observe the subsurface for evidence of the NAPL pathway.
- *PSQ #4:* What is the source of the release?
  - The Navy will conduct pressure testing of petroleum pipelines at the Site, conduct fuel fingerprint analysis of NAPL for comparison against the previously reported RAA-1 plume composition and excavate a trench to visually observe the suspected release location.

6.6 STEP 6 – SPECIFY PERFORMANCE ACCEPTANCE CRITERIA

The purpose of Step 6 is to identify potential sources of study errors and describe how these potential errors will be minimized throughout the investigation. This study does not rely on quantitative analytical data as the principal input to answer the PSQs. Rather, qualitative inputs such as visual observations, gauging, and fuel fingerprint analysis will be used.

Sources of potential error that could compromise the study's conclusions and project objective (propose a means to arrest the discharge of NAPL to surface water) include the inability to conduct any of the activities proposed in this WP. As discussed in Section 8, this project proposes various activities to gather information, which will then be used in a weight-of-evidence based approach to identify the NAPL source and migration pathway. If any of the activities cannot be conducted, it could result in uncertainty in the conclusions reached by the study.

Quantitative analytical data will be collected in the form of TPH-DRO and TPH-LRO analyses for soil and groundwater samples. Management of potential sampling errors are discussed in the following sections.

6.6.1 Sources of Error

Sources of error in an investigation may be divided into two main categories: sampling error and measurement error. A sampling error (field or laboratory) occurs because of a sampling design that does not allow for an equal probability of including any given part of the population of interest in the sample. A measurement error occurs because of a performance variance from laboratory instrumentation, or from analytical methods or operator error. The EPA identifies the combination of these two categories of errors as the "total study error" (EPA 2006). The objective is to minimize the total study error so that decision makers can be confident that the data collected accurately represent the chemical characteristics of the site.

6.6.2 Managing Field Sampling Error

The investigation will use decision-error minimization techniques in sampling design, sampling methodologies, and laboratory measurement of COPCs.

Possible decision errors will be minimized during the field investigation by using the following methods:

- Evaluate all available historical data to identify Site COPCs, sampling locations, and Site characteristics.
- Use standard field sampling methodologies (as discussed in Section 9). Perform sampling activities in accordance with the *Final Project Procedures Manual, U.S. Navy Environmental Restoration Program, NAVFAC Pacific* (DON 2015).
- Use applicable analytical methods (discussed in Section 13) for sample analysis by a competent analytical laboratory accredited under the Department of Defense (DoD) Environmental Laboratory Accreditation Program (ELAP) to reduce measurement errors.
- Confirm analytical data to identify and control potential laboratory error and sampling error by using spikes, blanks, and replicate samples.

Exceedances of the QC criteria specified by DoD QSM 5.3 (DoD and DOE 2019) will be assessed during the decision-making process. Exceedances may be due to matrix interferences or matrix heterogeneity and may affect the decision of which sampling locations will be recommended for further action. If this occurs, results will be evaluated for usability, potential bias, and other effects that may influence the comparison of the results to PSLs. In addition, duplicate samples will be collected from each matrix to assess the heterogeneity of soil and related contaminant distribution. Additional data quality parameters will be evaluated through the use of field blank samples and rinsate samples.

6.6.3 Managing Laboratory Sampling Error

Sampling error may be introduced when the laboratory chemist selects a single portion of the field sample for laboratory analysis. To address this situation, the laboratory will implement sub-sampling of each soil sample per the laboratory standard operating procedure that is in general accordance with *Guidance for Obtaining Representative Laboratory Analytical Subsamples from Particulate Laboratory Samples* (EPA 2003).

6.6.4 Laboratory Measurement of COPCs

Possible decision errors generated by laboratory measurement errors will be minimized using applicable analytical methods (listed in Section 13) for sample analysis by a competent analytical laboratory evaluated by the DoD ELAP. The potential effect of laboratory measurement error will be discussed in the usability assessment.

Discrete soil samples shall be subsampled in the laboratory in alignment with the *Guidance for Obtaining Representative Laboratory Analytical Subsamples from Particulate Laboratory Samples* (EPA 2003).

The laboratory will use the following approach to sub-sample each soil sample:

- Combine the contents of all containers for a given sample; spread out onto an inert surface; briefly mix the sample by hand, and remove and discard any large sticks, rocks, or other materials.
- Following air drying, sieve the sample in its entirety through a 2-millimeter sieve.
- Subsequently, use either a multi-increment sampling approach (1-dimensional or 2-dimensional Japanese slab cake) or a rotary (sectorial) splitter to sub-sample for all parameters.
- Systematically collect 30 increments that add up to the analytical volume requirement for each analysis (e.g., 10 grams for metals by SW846 Method 6020A).
- Perform this task while ensuring that no particles are discriminated against by using a collection tool that is thin enough to collect the fines, but not too small to collect the largest particles.

The laboratory will document the sampling preparation and collection procedure.

The laboratory project manager will sign the worksheet describing and verifying that the sub-sampling was conducted in accordance with the required procedures. The signed worksheets will be part of the laboratory project deliverables. The prepared samples will be collected in exactly the same manner, including duplicates and laboratory QC samples.

The sample volumes will be collected in accordance with the DOH Technical Guidance Manual, Section 4.2, *Multi-Increment Sample Collection* (DOH 2017b). Laboratory QC samples will include triplicates.

6.7 Step 7 – Optimize the Design

The objective of Step 7 in the data quality objective process is to use the acceptance criteria generated in Steps 1 through 6 to develop a resource-effective design for collecting and measuring environmental data.

To answer the PSQs identified in Step 2 (Section 6.2), the activities proposed in this WP include the following:

- Collection of NAPL samples for fuel fingerprint analysis. Samples will be collected from the discharged NAPL in Halawa Stream and mobile NAPL in the subsurface adjoining the discharge location. The fuel fingerprint results will be compared against the RAA-1 subsurface plume composition (weathered diesel fuel [Naval Distillate F-76] and residual oil).
- Evaluation of as-built utility maps for subsurface petroleum storage and conveyance structures at the Site and potential preferential pathways (e.g., drains, conduits, etc.).
- Soil borings will be drilled at the Site and soil cores observed for visual evidence of mobile NAPL (i.e., core saturated with NAPL). A soil sample will be collected from the smear zone of each boring and analyzed for TPH-DRO and TPH-LRO (note that TPH-GRO is not proposed because gasoline is not currently being used at the Site). The results of the visual observations will be used to evaluate the location of a new release source.
- Based on an evaluation of the utility maps, soil boring visual observations, and leak tests (note that leak testing will be conducted at the discretion of the Navy fuel operations and is not within the scope of this investigation), a trench will be excavated to expose a segment of a subsurface petroleum pipeline or storage structure suspected to be the new release source. The purpose of the trench will be to visually observe the potential leak location and suspected migration pathway(s). In addition to visual observations, soil samples for TPH-DRO and TPH-LRO analysis will be collected from the pipeline bedding material or around the storage structure.
- Two groundwater monitoring wells will be installed in presumably upgradient locations to the release source. The purpose of the wells will be to delineate mobile NAPL at the water table and quantify dissolved-phase COPCs. The wells will be gauged for NAPL, and groundwater will be sampled for TPH-DRO and TPH-LRO analysis.
- TPH analyses with and without silica gel cleanup is not proposed because the fuel fingerprint results are expected to be sufficient for evaluating whether the NAPL discharge into Halawa Stream is the result of an unweathered new release or the weathered historical RAA-1 plume.

Additional discussion of the investigation design is presented in Section 8. A detailed summary of project tasks is included in Section 9. Soil and groundwater samples will be collected in accordance with the NAVFAC Pacific, Environmental Restoration Program Standard Operating Procedures (DON 2015) (identified for each task in Section 9) and will be analyzed using the U.S. Environmental Protection Agency methods listed in Section 10.

Standard field sampling methodologies will be utilized and QC (quality control) samples will be collected (i.e., blanks and duplicate samples) to confirm analytical data. Section 7 specifies the measurement performance criteria for soil and groundwater sample analytical data. The analytical laboratory will have current Department of Defense Environmental Laboratory Accreditation Program accreditation. Data verification and validation will be performed as described in Section 14.

7. Field Quality Control Samples

Measurement Performance Criteria Table – Field QC Samples

QC Sample	Analytical Group [a]	Frequency [b]	DQI	Measurement Performance Criteria
Soil/Water				
Field duplicate	TPH-DRO/LRO	10% of primary samples collected per matrix per analytical method	Precision	RPD ≤50% water [c] RPD ≤100% soil (judgmental) [c]
Field blank	TPH-DRO/LRO	Once per source of decontamination water per sampling event	Adequacy of the decontamination water quality	≤1/2 of LOQ
Equipment rinsate	TPH-DRO/LRO	5% of primary samples collected per matrix per analytical method	Adequacy of the decontamination process	≤1/2 of LOQ
MS/MSD [d]	TPH-DRO/LRO	10% of primary samples collected per matrix per analytical method	Bias/accuracy/precision	Use QC acceptance criteria at least as stringent as specified by DoD QSM 5.3 (DoD and DOE 2019)
Temperature indicator (Blank)	TPH-DRO/LRO	1/shipping cooler	Representativeness	Within holding temperature requirements in Worksheet #19

% percent
DoD Department of Defense
DQI data quality indicator
DRO diesel range organics
LOQ limit of quantitation
LRO lube range organics
MS matrix spike
MSD matrix spike duplicate
QSM quality systems manual
RPD relative percent difference

[a] Refer to Worksheets #11 and #15 for a list of all analytical groups.
[b] Per Procedure III-B, *Field* QC Samples (DON 2015); refer to Worksheet #20 for a summary of QC samples by project location, matrix, and analytical group.
[c] Per Section II, *Data Validation Procedures* (DON 2015).
[d] MS/MSD samples are considered laboratory QC samples, but additional sample mass/volume will be collected in the field for additional analysis as needed.

8. Sampling Design and Rationale

The sampling design, which was developed to optimize resources and generate data to meet the project objectives, is based on the project-specific data quality objectives, historical knowledge of the Site, characteristics of the contaminants, and the primary modes of contaminant transport. In general, three types of samples are proposed for collection: soil, groundwater, and NAPL.

Hotel Pier has operated as a refueling hub since World War II for conventional refueling of large naval vessels. In July 1997, approximately 1,500 to 3,500 gallons of diesel fuel leaked from a damaged fuel line into the [redacted] chamber. This release may have originated from Valve Chamber No. [redacted] and a subsurface petroleum pipeline paralleling [redacted] This area, termed RAA-1, has been defined to encompass the NAPL plume (PPA-l) in the Hotel Pier Area, in which the recoverable portion of the NAPL plume was estimated to be 26 gallons. Previous investigations identified NAPL on the groundwater in the area of [redacted] which has been identified as weathered diesel fuel (Naval Distillate F-76) and residual oil, based on the 1997 RI report (DON 1997c). During that investigation, [redacted] and the subsurface petroleum pipelines that run parallel to [redacted] were considered the most probable sources of contamination as multiple fuel spills have occurred at the [redacted] area. Additionally, previous investigations identified that the NAPL plume was consistent with the locations of TPH impacts in soil and groundwater.

In March 2020, the Navy observed a discharge of petroleum into Halawa Stream from the Site at wharf H-[redacted]. The Navy suspects the release to the ocean is occurring at the seawall from a 4-inch diameter steel pipe. During high tide the pipe end becomes submerged under the stream surface. It was reported that the Navy abandoned the pipe by plugging it, which reportedly slowed the release initially; however, the rate of release has subsequently increased. The NAPL has a dark brown color and a petroleum odor. A floating oil containment boom and sorbents were placed in Halawa Stream to prevent the surface water petroleum NAPL from migrating. The scope of this project is to develop a recommendation to arrest the discharge of NAPL to the surface of Halawa Stream.

The overall technical approach for this project is to use a weight-of-evidence approach to evaluate the source of the ongoing NAPL discharge into Halawa Stream, including whether the discharge is a result of the RAA-1 subsurface plume. The investigation will include:

- A review of available utility drawings for subsurface petroleum pipelines or petroleum storage tanks in the vicinity of the discharge. The utility drawings will also be reviewed for potential subsurface migration pathways such as drains and conduits.
- Soil borings to determine the extent of NAPL in the subsurface and to trace the release from the discharge location. A total of 10 borings will be advanced to the approximate bottom of the capillary fringe (approximately 8-10 feet bgs) to evaluate the lateral extent of the NAPL plume (Figure 3). The initial borings will be located near to the NAPL discharge location into Halawa Stream. Each consecutive boring thereafter will be at "step-out" locations determined based on visual observations (e.g., NAPL-saturated, odor, smell, photoionization screening) of NAPL. If NAPL is observed within a soil core, a step-out location will be advanced to a distance further away (at least 20 feet); conversely, if NAPL is not observed within a soil core, then no step-out will be required in that direction. Step-out borings in several directions from the Halawa Stream discharge location will be conducted. Each boring will be continuously cored to determine the presence of petroleum NAPL, obtain lithologic information, and conduct sample analysis. One soil sample will be collected from the smear zone of each boring and analyzed for TPH-DRO and TPH-LRO. TPH analyses with and without silica gel cleanup

is not proposed because the fuel fingerprint results are expected to be sufficient for evaluating whether the NAPL discharge into Halawa Stream is the result of an unweathered new release or the weathered historical RAA-1 plume. Potential boring locations are illustrated on Figure 3; however, because the boring locations will be determined based on field observations, the locations illustrated are considered tentative.

Prior to any intrusive activities, utility clearance will be performed using geophysical methods to identify and confirm what utility lines are present in the footprint of the plume and to determine the location of the pipeline manifold that was delineated from a previous investigation. The information will also be used to select boring and groundwater monitoring well locations that are 5 feet away from utilities and subsurface features on the Site that could be impacted during drilling. Figure 3 illustrates the location of subsurface utilities based on available site records. It is anticipated that each borehole will be excavated using direct-push technology (DPT), or hollow-stem auger (HSA) if refusal is encountered.

- Excavation of a trench at the suspected release area to visually observe the suspected release source. The location of the trench will be determined by information gathered from available utility drawings and observations made during the soil borings (i.e., utility drawings will be used to determine petroleum sources, and the borings will be used to evaluate the possible release location). The purpose of the trench will be to expose the possible release source for visual confirmation. Soil samples will be also collected from the trench and analyzed for TPH-DRO and TPH-LRO. TPH analyses with and without silica gel cleanup is not proposed because the fuel fingerprint results are expected to be sufficient for evaluating whether the NAPL discharge into Halawa Stream is the result of an unweathered new release or the weathered historical RAA-1 plume. The soil samples will be collected from bedding material under the pipe or storage tank (if applicable) to supplement visual observations and evaluate whether the bedding material is potentially a transport pathway.
- Collection of NAPL samples for fuel fingerprint analysis to determine whether the NAPL that is discharging into Halawa Stream is consistent with the RAA-1 subsurface NAPL plume or is a different undocumented release source. A NAPL sample will be collected from the discharge into Halawa Stream and from NAPL observed within the subsurface in the borings or trench.
- Installation of two groundwater monitoring wells in an upgradient or cross-gradient direction relative to the suspected subsurface release location to possibly delineate mobile NAPL at the water table and quantify dissolved-phase COPCs. If NAPL is encountered in the well prior to sampling, groundwater will not be collected.

9. Field Project Implementation (Field Project Instructions)

This section provides a brief overview of project activities. All work shall be done in accordance with the *Project Procedures Manual, U.S. Navy Environmental Restoration Program, NAVFAC Pacific* (DON 2015), as listed in Table 9-1. Field personnel will perform each task in accordance with the site-specific health and safety plan.

Proposed investigation activities include the following (not necessarily listed in chronological order):

- Mobilization/Demobilization
- Site preparation
- Geophysical survey and utility clearance
- Land survey
- Drilling and soil screening
- Soil sample collection
- Monitoring well installation and development
- Groundwater sample collection
- NAPL sample collection
- Well gauging
- Equipment decontamination
- Investigation derived waste management and disposal

The procedures cited below are from the *Project Procedures Manual, U.S. Navy Environmental Restoration Program, NAVFAC Pacific* (DON 2015). Samples will be managed in accordance with NAVFAC Pacific Environmental Restoration Program Procedure III-F, *Sample Handling, Storage, and Shipping* (DON 2015). Equipment decontamination will be performed in accordance with Procedure I-F, *Equipment Decontamination* (DON 2015).

9.1 Pre-Work Meeting

Before mobilization, AECOM personnel will meet with the Navy to address the following issues:

- Field activities
- Schedule of field operations
- Sampling and sample handling
- Site-specific safety issues
- Logistics, including area access
- Staging of investigation-derived wastes (IDWs)

Prior to meeting with Navy representatives, an agenda and updated schedule of the field activities will be delivered to the NAVFAC Hawaii remedial project manager.

9.2 MOBILIZATION

Field equipment and supplies will be mobilized to the Site. A field manager and site safety and health officer (SSHO) will be on-site for each phase of fieldwork.

9.3 HEALTH AND SAFETY KICK-OFF BRIEFING

On the first day of field activities for each phase of work, the SSHO will review the health and safety plan with on-site project and subcontractor personnel. Special attention will be paid to emergency response procedures and site-specific protocol to ensure that personnel are aware of the applicable precautions and procedures. The SSHO will also verify that field personnel have evidence of proper and current training (i.e., 29 Code of Federal Regulations § 1910.120 Occupational Safety and Health Administration 40-hour and 8-hour annual refresher training) prior to the start of fieldwork. In addition, brief health and safety meetings will be held at the beginning of each workday throughout the duration of the fieldwork. The SSHO will monitor the field activities of project and subcontractor personnel.

9.4 SITE PREPARATION

Field team personnel will secure fieldwork areas based on locations selected during the pre-work meeting and will mark the proposed utility clearance and field sampling locations (Figure 3). The field team will also visually inspect the Site for potential health and safety hazards and prepare a location for temporary storage of IDW following discussion with the Navy remedial project manager. Any access permits or other pre-fieldwork approvals will be obtained before field activities begin.

9.5 GEOPHYSICAL SURVEY AND UTILITY CLEARANCE

All soil boring and monitoring well locations will require geophysical clearance at the Site. Prior to intrusive activities, magnetic, electromagnetic, and ground penetrating radar surveys will be conducted by a geophysical subcontractor at proposed soil boring and monitoring well locations to determine the locations of underground utilities and other subsurface features at the footprint of the plume in accordance with Procedure I-A-5, *Utility Clearance* (DON 2015). The purpose of the survey is to prevent damage to utilities during borehole drilling. Ultrasonic detection may be necessary to locate non-metallic (e.g., asbestos-cement, high-density polyethylene, or polyvinyl chloride) utility lines that may not have tracer wire provisions. In addition, Hawaii One-Call will be called for utility clearance prior to intrusive work, if required.

Additionally, potential conduits for the fuel plume to reach the harbor will be located. This will involve records research and working with shipyard personnel to identify utilities that are within the fuel plume, both vertically and horizontally. Facility records will also be researched for information on the location of utilities and pipelines within the study area.

The geophysical survey will be used to identify utilities below each soil boring and monitoring well location using a grid of parallel profile lines spaced approximately 5 feet apart and oriented in two perpendicular directions. Profile ends will be staked so that significant geophysical anomalies that may represent subsurface structures or utilities can be identified prior to drilling, augering, or any other subsurface work to be done at the Site. Biodegradable spray paint, whiskers, or marking flags will be used to indicate the locations of all utilities, structures, or other anomalies detected within the surveyed areas. Magnetic and electromagnetic measurements (i.e., total field and vertical gradient readings) will be recorded at each grid intersection, processed, and then displayed on data contour maps. This method can theoretically detect one or more metal anomalies buried 15 feet below ground surface (bgs). Geophysical data will be plotted as contours on site maps.

9.6 LAND SURVEY

A licensed land surveyor will locate, mark, and determine the coordinates of boreholes, monitoring wells, the trench, and other pertinent site features in accordance with Procedure I-I, *Land Surveying* (DON 2015). It is anticipated that the land surveying activities will be conducted after drilling and sampling have been completed to determine the horizontal and vertical (elevation) coordinates of each monitoring well location and horizontal coordinates of each borehole and trench location. Each sampling location will be surveyed to provide location coordinates based on North American Datum 83 State Plane Zone 3 coordinate system and ground surface elevations based on msl. The surveyor will provide the data with an accuracy of ±0.1 feet for horizontal coordinates and ±0.01 feet for elevation.

9.7 DRILLING AND SOIL SCREENING

A total of 10 soil borings will be advanced to the bottom of the capillary fringe (approximately 8-10 feet bgs) to delineate the lateral and vertical extent of NAPL at the Site. The boreholes will be drilled using DPT; however, if site conditions do not allow for DPT drilling, HSA drilling methods will be used. Each boring will be continuously cored to determine the presence of petroleum NAPL, obtain lithologic information, and conduct sample analysis. One soil sample will be collected from the smear zone of each boring and analyzed for TPH-DRO and TPH-LRO. TPH analyses with and without silica gel cleanup is not proposed because the fuel fingerprint results are expected to be sufficient for evaluating whether the NAPL discharge into Halawa Stream is the result of an unweathered new release or the weathered historical RAA-1 plume. A portion of the soil from each sample interval will also be screened for volatile organic compounds with a photoionization detector to monitor using a headspace procedure. Each soil core will be logged by the field geologist using the United Soil Classification System in accordance with Procedure I-E, *Soil and Rock Classification* (DON 2015). Samples will be collected as described in Section 9.8, *Soil Sample Collection*. Visual observations of the soil cores (e.g., staining, odors, photoionization detector) will be used to evaluate the presence of NAPL.

After soil screening and sampling are complete, or when drilling refusal occurs prior to reaching the depth intended for soil sample collection, the borehole will be properly abandoned in accordance with Procedure I-C-1, *Monitoring Well Installation and Abandonment* (DON 2015). Abandonment will involve sealing the borehole with bentonite-cement grout. The grout mixture will consist of a mix of 7 to 9 gallons of water per 94-pound bag of Portland Type I or II cement with 3-5 percent by weight of powdered bentonite. The grout will be placed in one continuous pour from the bottom of the boring to within at least 0.5 to 2 feet of the ground surface through a tremie pipe or the HSA. Additional grout may need to be placed if significant settlement occurs. The remaining portion of the boring will be filled with topsoil (unpaved areas), asphalt cold patch, or concrete (paved areas). If refusal occurs, the soil boring will be relocated to an alternate location nearby.

If NAPL is encountered in boreholes, one NAPL sample will be collected to characterize the NAPL fuel type.

9.8 SOIL SAMPLE COLLECTION

One soil sample will be collected from the smear zone of each boring and analyzed for TPH-DRO and TPH-LRO in accordance with Procedure I-B-1, *Soil Sampling* (DON 2015). The entire core from the upper two feet of the capillary fringe will be placed in glass jars and shipped in coolers that are maintained at a temperature below 4°C +/- 2°C. Every effort will be made to reduce volatilization from the container by minimizing the time that the sample container remains open. The core will then be analyzed for TPH-DRO and TPH-LRO.

9.9 TRENCH EXCAVATION

An approximately 10- to 15-foot trench will be excavated to expose a suspected subsurface leak source, such as a pipe or storage tank. It is assumed that the ground surface for the trench is unpaved. An 8-foot-high chain-link fence may also need to be temporarily removed and then re-installed after completion of the trench. The trench will be used to visually observe the pipe or storage tank and bedding material for evidence of a NAPL release. The depth of the trench is not anticipated to exceed more than 4 feet bgs because any subsurface structures are not anticipated to be deeper than the water table at approximately 4 feet bgs. Two soil samples will be collected from the trench and analyzed for TPH-DRO and TPH-LRO. If NAPL is observed, it will be collected and analyzed for fuel fingerprint analysis.

9.10 MONITORING WELL INSTALLATION AND DEVELOPMENT

Two groundwater monitoring wells will be constructed for the purpose of NAPL gauging/mobility and collecting groundwater samples. Monitoring wells will be located to provide groundwater conditions hydraulically upgradient and downgradient of the NAPL plume. The wells will be installed using either a HSA drill rig or a direct push drill rig, depending upon the subsurface material encountered at the Site, in accordance with Procedure I-C-1, *Monitoring Well Installation and Abandonment* (DON 2015). The wells are estimated to be constructed using 2-inch inner diameter polyvinyl chloride screen and casing and that a standard sand pack will be installed. Monitoring wells will be installed to depths of approximately 15 feet bgs with a 10-foot section of well screen. All wells will be finished as flush type completions with regular duty well vaults since these are not intended to be installed in high traffic areas. Each monitoring well will be surveyed by a registered land surveyor to determine the precise location of the well within 0.10-foot and the elevation of the top of well casing to an accuracy of 0.01-foot.

Monitoring wells will be developed in accordance with Procedure I-C-2, *Monitoring Well Development* (DON 2015). Well installations may be part of a future gauging and monitoring program for the Site. Either a manual surge block method or hand-operated inertial pump will be employed to ensure the perforated well screens are clear and to allow groundwater to recharge in the wells. During development, physical parameters (i.e., temperature, hydrogen ion concentration [pH], conductivity, dissolved oxygen (DO), redox potential, and turbidity) will be measured and recorded. Stabilization of these parameters will indicate that the well is ready for sampling. Upon completion of the well development, it is assumed that a single groundwater sampling event will be conducted to determine the nature and extent of any dissolved phase or NAPL plume at the Site. Groundwater samples will not be collected at monitoring wells if NAPL is encountered during gauging activities.

9.11 GROUNDWATER SAMPLE COLLECTION

Groundwater samples will be collected from the newly installed monitoring wells to characterize the shallow groundwater aquifer. Groundwater will not be collected if NAPL is encountered in the well prior to sampling. Groundwater sampling activities will be conducted in accordance with Procedure I-C-3, *Monitoring Well Sampling* (DON 2015).

Prior to beginning groundwater sampling, water level measurements will be acquired using an oil-water interface probe, and groundwater within each well will be purged using low-flow techniques and a submersible pump. For low yield wells (i.e., those that recover less than 80 percent in 2 hours), one borehole volume of water will be removed, and the well will be sampled after it has recovered enough to provide sufficient water for the required laboratory analyses. Water quality parameters of well purge water will be measured in a flow-through cell using a multi-probe water quality sampling sonde. The following water quality parameters will be monitored and recorded on groundwater sampling logs during purging: pH, specific conductivity, DO, salinity, temperature, oxidation-reduction potential, turbidity, and total dissolved solids. Purging activities will be considered complete when after a minimum of five readings, three consecutive readings of quality parameters have stabilized to within ±0.2°Celsius for temperature, ±0.1 standard units for pH, ±3 percent for specific conductance, ±10 percent for DO, and ±10 millivolts for redox potential. Upon completion of groundwater purging activities, groundwater sampling activities will be initiated. Collected groundwater samples will be analyzed for TPH-DRO and TPH-LRO. TPH analyses with and without silica gel cleanup is not proposed because the fuel fingerprint results are expected to be sufficient for evaluating whether the NAPL discharge into Halawa Stream is the result of an unweathered new release or the weathered historical RAA-1 plume.

9.12 WELL GAUGING

Groundwater level measurements will be collected from the newly installed monitoring wells for the purpose of NAPL gauging/mobility and to evaluate the groundwater hydraulic gradient and direction at the Site. Water level measurements will be acquired using an oil-water interface probe and collected twice: once during high tide and once during low tide. During each gauging event, water level measurements will be collected as close together temporally as possible.

9.13 EQUIPMENT DECONTAMINATION

All non-consumable equipment that contacts potentially contaminated soil and groundwater will be decontaminated in accordance with Procedure I-F, *Equipment Decontamination* (DON 2015). All consumable equipment and non-hazardous solid wastes will be treated as trash and disposed of as municipal solid waste.

Equipment will be decontaminated by a non-phosphate detergent scrub followed by a freshwater rinse and a distilled or deionized water rinse. Decontamination will take place on plastic sheeting to capture decontamination fluids. Decontamination water will be containerized (i.e., using U.S. Department of Transportation-approved 55-gallon drums) until the field effort is complete and the water can be characterized for proper disposal.

Clean equipment will be stored on plastic sheeting in an uncontaminated area. Equipment stored for an extended period will also be covered with plastic sheeting.

9.14 INVESTIGATION DERIVED WASTE MANAGEMENT AND DISPOSAL

Miscellaneous IDW will be generated during the investigation. The IDW is expected to consist mainly of personal protective equipment, soil cuttings, monitoring well purge and development water, and equipment decontamination water. IDW will be handled, stored, and labeled in accordance with this document and Procedure I-A-6, *IDW Management* (DON 2015).

Unless otherwise indicated, IDW will be stored temporarily in U.S. Department of Transportation-approved 55-gallon drums at a designated temporary IDW storage area. IDW drums labeled with the date and monitoring well location associated with the IDW will be placed on wood pallets (soil IDW) or secondary containment pallets (liquid IDW) and covered with tarps.

Upon completion of field activities, a final inspection and inventory of the drums will be conducted to ensure that they are labeled correctly and have been placed at the designated temporary IDW storage area to await disposal. A Hawaii-based subcontractor will be used for the disposal of all generated soil and liquid IDW. Personal protective equipment will be decontaminated, if appropriate, or collected in plastic trash bags and disposed of as solid waste.

Based on the laboratory analysis performed during previous investigations and evaluations, all IDW is anticipated to be non-hazardous. IDW generated during the field effort will be characterized using the analytical results obtained from the soil and groundwater samples collected during the investigation. The concentration of contaminants in the soil and groundwater samples will be compared to the Resource Conservation and Recovery Act (RCRA) limits. If none of the contaminants in the groundwater exceed the RCRA limits, the corresponding IDW will be characterized as non-hazardous. Additionally, if none of the soil results exceed 20 times the RCRA limits, the soil will also be characterized as non-hazardous. If any of the results exceed the RCRA limits, additional waste characterization will be performed as required. Additional analysis may also be conducted prior to disposal as required by the disposal facility. The IDW inventory and analytical data from the field effort will be evaluated and cross-referenced to select IDW disposal methods in accordance with regulatory requirements. The IDW inventory and/or cross-referencing will be summarized in the final plume investigation report. All pertinent manifests and disposal documentation will be included as an appendix in the final report.

9.15 DATA EVALUATION (TIER 1)

DOH Tier 1 EALs (DOH 2017a) for sites where groundwater is not used for drinking purposes and the nearest surface water body is less than 150 meters will be used as project screening criteria for groundwater and soil.

9.16 DATA

Data generated during this investigation will include the following:

- TPH-DRO and TPH-LRO concentrations reported for soil and groundwater samples. TPH analyses with and without silica gel cleanup is not proposed because the fuel fingerprint results are expected to be sufficient for evaluating whether the NAPL discharge into Halawa Stream is the result of an unweathered new release or the weathered historical RAA-1 plume.
- Fuel fingerprint chromatography reported for NAPL samples.
- Data recorded on monitoring well development and groundwater sampling logs, which will include groundwater quality data (temperature, conductivity, turbidity, oxidation reduction potential, and DO).
- Groundwater level monitoring data.

9.16.1 Data Management Tasks

All analytical data, field notes, data sheets, and other information necessary to support the project will be maintained in an AECOM electronic database. All hard copies of analytical data, field notes, data sheets, and other information necessary to support the project will be maintained in the AECOM Honolulu office.

9.16.2 Documentation and Records

All field observations and measurements will be recorded in a field notebook and project-specific field data sheets. All samples will have global positioning system locations. Chain-of-custody forms, air bills, and sample logs will be prepared and retained for each sample. See Table 9-1 for a list of documentation standard operating procedures. All data will be included in the investigation report.

9.16.3 Assessment/Audit Tasks

The project chemist, QA program manager, and field manager will be responsible for assessment and audit tasks. The contract task order project manager will be responsible for coordinating the field audit.

9.16.4 Data Reporting

The analytical laboratory will verify, reduce, and report data as specified in their Department of Defense Environmental Laboratory Accreditation Program-evaluated laboratory QA plan. Reported data will be provided as hard copy and electronic data deliverables. The laboratory deliverables will be consistent with Procedure I-A-7-1, *DoD Quality Systems Manual Appendix DoD A Reporting Requirements* (DON 2015).

Analytical data will be submitted by the laboratory to the data validation firm as both a hard copy and an electronic file. The electronic file will be created by transferring the analytical data package to a Microsoft Access database. The database will be parsed through internal verification and validation checks. Internal verification and validation checks are performed to identify data entries that exceed the specified QC criteria. If QC criteria are not met or if errors are identified due to an incorrect or incomplete laboratory submittal, the data package will be returned to the laboratory for correction and resubmittal.

The analytical data will be reviewed before it is validated to address time-critical issues such as re-extraction, matrix interference, and holding times. The data usage and the appropriate QA/QC level will be evaluated.

9.16.5 Data Review Tasks

All analytical laboratory data results will be validated by a third-party data validation firm. Third-party data validation will consist of standard validation (90 percent) and full validation (10 percent). The first 10 percent of project field data (COPCs) generated by the laboratory will be validated at full validation to establish a baseline, ensuring that the laboratory has complied with the requirements outlined in both the analytical methods and the data validation procedures presented in Procedure I-A-7, *Analytical Data Validation Planning and Coordination* (DON 2015). In addition, data quality checks (i.e., evaluating for precision and accuracy) will be performed once the analytical data are received from the laboratory. AECOM will verify the data against the specified limits of quantitation and limits of detection as specified in Section 10. All documents produced for the project will be kept in a secured facility for the life of the project. Upon closure of the project, laboratory documents will be archived with the project report in the administrative record file at NAVFAC Pacific.

In addition, all project analytical data will be validated by a third-party data validation firm in accordance with Procedure II-H, *Level C and Level D Data Validation for Total Petroleum Hydrocarbons by SW-846 8015* (DON 2015).

Data received from the validation firm will be uploaded into AECOM’s Microsoft Structured Query Language server 2005, which is managed via EQuIS (Environmental Data Management Software).

Table 9-1: Field SOPs Reference Table

Reference Number	Title, Revision Date and/or Number [a]	Originating Organization of Sampling SOP	Equipment Type	Comments
I-A-5	Utility Clearance (DON 2015)	NAVFAC Pacific	Utility detector, metal detector, and/or magnetometer. Ground Penetrating Radar for non-metallic features.	No
I-A-6	IDW Management (DON 2015)	NAVFAC Pacific	N/A.	No
I-A-7	Analytical Data Validation Planning and Coordination (DON 2015)	NAVFAC Pacific	N/A.	No
I-A-8	Sample Naming (DON 2015)	NAVFAC Pacific	N/A.	No
I-B-1	Soil Sampling (DON 2015)	NAVFAC Pacific	Split-spoon sampler and liners with hollow-stem or solid-stem auger.	No
I-B-1	Soil Sampling (DON 2015)	NAVFAC Pacific	Disposable plastic scoops for surface samples and liners for subsurface soil samples.	No
I-B-2	Geophysical Testing Procedure (DON 2015)	NAVFAC Pacific	Low frequency electromagnetic induction and ground penetrating radar.	No
I-C-1	Monitoring Well Installation and Abandonment (DON 2015)	NAVFAC Pacific	Direct push drill rig.	No
I-C-2	Monitoring Well Development (DON 2015)	NAVFAC Pacific	Surge block or submersible pump.	No
I-C-3	Monitoring Well Sampling (DON 2015)	NAVFAC Pacific	Bladder pump.	No
I-D-1	Drum Sampling (DON 2015)	NAVFAC Pacific	COLIWASA or glass thieving tubes.	No
I-E	Soil and Rock Classification (DON 2015)	NAVFAC Pacific	N/A.	No
I-F	Equipment Decontamination (DON 2015)	NAVFAC Pacific	N/A.	No
I-H	Direct Push Sampling Techniques (DON 2015)	NAVFAC Pacific	N/A.	No
I-I	Land Surveying (DON 2015)	NAVFAC Pacific	GPS.	No
II-H	Level C and Level D Data Validation for Total Petroleum Hydrocarbons by SW-846 8015 (DON 2015)	NAVFAC Pacific	N/A.	No
III-A	Laboratory QC Samples (Water, Soil) (DON 2015)	NAVFAC Pacific	N/A.	No
III-B	Field QC Samples (Water, Soil) (DON 2015)	NAVFAC Pacific	N/A.	No
III-D	Logbooks (DON 2015)	NAVFAC Pacific	N/A.	No
III-E	Record Keeping, Sample Labeling, and Chain-of-Custody Procedures (DON 2015)	NAVFAC Pacific	N/A.	No
III-F	Sample Handling, Storage and Shipping (DON 2015)	NAVFAC Pacific	N/A.	No

COLIWASA composite liquid waste sampler
GPS global positioning system
IDW investigation-derived waste
N/A not applicable
NAVFAC Naval Facilities Engineering Command
SOP Standard Operating Procedure
[a] Applicable procedures from the Project Procedures Manual (DON 2015).

Sample Details Table

Matrix	Sampling Locations/ ID Numbers (see Section 12 for explanation of ID numbers)	Analytical Group	Analytical SOP/Lab SOP	Data Package Turnaround Time	Laboratory/Organization (name and address, contact person and telephone number)	Backup Laboratory/Organization (name and address, contact person and telephone number)
Soil	HPPM-SS-01 to HPPM-SS-15	TPH-DRO/LRO	SW-846 8015C	14 days	[redacted]	NA
Groundwater	HPPM-GW-01 HPPM-GW-02	TPH-DRO/LRO	SW-846 8015C	7 days	[redacted]	NA
NAPL	HPPM-NP-01 HPPM-NP-02	Fuel Fingerprint	ASTM D2887	NA	[redacted]	Apex Lab Amy Patton 6700 SW Sandburg St Tigard, OR 97223 503-718-2323

Note: TPH analyses with and without silica gel cleanup is not proposed because the fuel fingerprint results are expected to be sufficient for evaluating whether the NAPL discharge into Halawa Stream is the result of an unweathered new release or the weathered historical RAA-1 plume.
ID identification
NA not analyzed

10. Reference Limits and Evaluation Table

The preliminary project screening levels (PSLs) for soil will be based on the DOH EALs (DOH 2017a) Table B-2 Soil Action Levels (potentially impacted groundwater is not a current or potential drinking water resource surface water body is located within 150 meters of release site).

The preliminary PSLs for groundwater will be mainly based on DOH EALs (DOH 2017a) Table D-1c Groundwater Action Levels (groundwater is not a current or potential drinking water resource; surface water body is located within 150 meters of release site).

NAPL samples for fuel fingerprint testing are not included in this worksheet because the analysis is not associated with any project screening levels or laboratory-specific limits.

Matrix **Surface and Subsurface Soil**
Analytical Group **TPH**

							Laboratory-Specific Limits		
Analyte	CAS No.	DOH EALs [a]	PSL	Reference	LOQ Goal	LOD Goal	LOQ	LOD	DL
TPH-DRO (C9-C25)	STL00354	219	219	[a]	73	30	50.0	30.0	9.90
TPH-LRO (C24-C40)	STL00631	500	500	[a]	150	50	50.0	30.0	20.0

Note: All units are milligram per kilogram (mg/kg).
— no data
CAS Chemical Abstracts Service
DL detection limit
LOD limit of detection
PSL project screening levelNo. number
[a] DOH EALs (DOH 2017a) Table B-2. Soil Action Levels, potentially impacted groundwater is not a current or potential drinking water resource surface water body is located within 150 meters of release site (DOH 2017a).

Matrix **Groundwater**
Analytical Group **TPH**

					Laboratory-Specific Limits		
Analyte	CAS No.	PSL [a]	LOQ Goal	LOD Goal	LOQ	LOD	DL
TPH-DRO (C9-C25)	STL00354	640	192	64	0.500	0.300	0.0900
TPH-LRO (C24-C40)	STL00631	640	192	64	0.500	0.300	0.180

Note: All units are microgram per liter (µg/L).
— no data
µg/L microgram per liter
CAS Chemical Abstracts Service
DL detection limit
No. number
PSL project screening level
[a] DOH EALs (DOH 2017a) Table D-1c. Groundwater Action Levels, groundwater is not a current or potential drinking water resource, surface water body is located within 150 meters of release site (DOH 2017a).

11. Analytical Standard Operating Procedure References Table

Lab SOP Number	Title, Revision Date, and/or Number	Definitive or Screening Data	Matrix and Analytical Group	Instrument	Variance to QSM (Yes/No)	Modified for Project Work? (Yes/No)
Preparatory and Misc. Methods						
TA-WC-0160	Percent Moisture/Percent Solids [Method SM 2540 G]; Rev. 22; 5/22/2020	Definitive	Percent Moisture (Soil)	N/A	No	No
TA-WC-0160	Percent Moisture/Percent Solids [Method SM 2540 G]; Rev. 22; 5/22/2020	Definitive	TPH-DRO/LRO (Soil and Water)	Preparation	No	No
Soil and Water Analysis Methods						
TA-GS-0335	Extractable Petroleum Fuel Hydrocarbons [Method 8015B and D Mod]; Rev. 23; 4/30/2020	Definitive	TPH-DRO/LRO (Soil and Water)	GC-MS	No	No
NAPL						
S-002 R-07	Hydrocarbon Fuel Scan by ASTM D2887 Modified-GC/FID	Screening	Fuel Fingerprint (NAPL)	GC-MS	No	No

Note: The laboratory SOPs listed in Worksheet #23 are the most current revisions at the time of publication of this WP. AECOM will review the laboratory SOPs immediately prior to sample submittal to ensure that the laboratory uses SOPs that are in compliance with the DoD QSM annual review requirement.

ASTM	ASTM International
FID	flame ionization detector
GC	gas chromatography
GC-MS	gas chromatography-mass spectrometry
N/A	not applicable

12. Sample Custody Requirements

Each sample will be assigned a chain-of-custody sample identification (ID) number and a descriptive ID number in accordance with Procedure I-A-8, *Sample Naming* (DON 2015). All sample ID numbers will be recorded in the field logbook in accordance with Procedure III-D, *Logbooks* (DON 2015). The chain-of-custody sample ID number (the only ID number submitted to the analytical laboratory) is used to facilitate data tracking and storage. The chain-of-custody sample ID number allows all samples to be submitted to the laboratory without providing information on the sample type or source. The descriptive ID number is linked to the chain-of-custody sample ID number, which provides information regarding sample type, origin, and source.

12.1 Chain-of-Custody Sample Identification Number

A chain-of-custody sample ID number will be assigned to each sample as follows to facilitate data tracking and storage:

JSxxx

Where:

J	=	Designating the sampling team's home office (e.g., Honolulu office).
S	=	Designating contract task order N6274220F0164 (this designator is assigned for this project).
xxx	=	Chronological number, starting with 001.

QC samples will be included in the chronological sequence.

12.2 Descriptive Identification Number

A descriptive ID number (for internal use only) will identify the sampling location, type, sequence, matrix, and depth. The descriptive ID number is used to provide sample-specific information (e.g., location, sequence, and matrix). It is predicted that the site will be investigated as one area due to current site use, relevant contaminant sources, area size, and proximity to each other. The descriptive identifier is not revealed to the analytical laboratory. The descriptive ID number for all samples is assigned as follows:

HPPM-bbcc-d-Dff.f

Where:

HPPM	=	Site area (Hotel Pier Pipeline Manifold Area).
bb	=	Sample type and matrix (Table 12-1).
cc	=	Location number (e.g., well 01, 02, 03 or borehole 01, 02, 03).
d	=	Field QC sample type (Table 12-2).
D	=	The letter "D" denoting depth.
ff.f	=	Depth of sample in feet below ground surface (measured to the tenth of a foot). For field blanks, and equipment blanks, the depth field will contain the date of collection.

For example, the sample number HPPM-SS01-S-D2.0 would indicate that the sample is the first sample collected from Hotel Pier Pipeline Manifold Area at subsurface soil sampling location 01, at 2 feet below ground surface. The duplicate sample would be designated as HPPM-SS01-D-D2.0. These characters will establish a unique descriptive identifier that will be used during data evaluation.

Table 12-1: Sample Type and Matrix Identifiers

Identifier	Sample Type	Matrix
SS	Subsurface Soil	Soil
NP	Non-aqueous Product	Oil
GW	Groundwater	Water
WQ	Water Blanks	Water

Table 12-2: Field QC Sample Type Identifiers

Identifier	Field or QC Sample Type	Description
S	Primary Sample	All field samples, except QC samples
D	Duplicate	Co-located for soil (adjacent liners)/replicate for water
E	Equipment Blank	Water
B	Field Blank	Water

12.3 HANDLING, SHIPPING, AND CUSTODY

All samples collected for analysis will be recorded in the field logbook in accordance with Procedure III-D, *Logbooks* (DON 2015). All samples will be labeled and recorded on chain-of-custody forms in accordance with Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody Procedures* (DON 2015). Samples will be handled, stored, and shipped in accordance with Procedure III-F, *Sample Handling, Storage, and Shipping* (DON 2015). All samples collected on this project will arrive at the analytical laboratory within holding time requirements.

All samples received at the analytical laboratory will be managed in accordance with laboratory standard operating procedures for receiving samples, archiving data, and sample disposal and waste collection, as well as, storage and disposal per Section 5.8, "Handling Samples and Test Items" of the *Department of Defense (DoD) and Department of Energy (DOE) Consolidated Quality Systems Manual (QSM) for Environmental Laboratories,* Version 5.3 (DoD and DOE 2019).

13. Laboratory Quality Control Samples Table

Matrix	**Soil and Water**
Analytical Group	**TPH-DRO/LRO**
Analytical Method/SOP Reference	**Analytical Method: EPA Method 8015C** **Preparation Method: EPA 3550C** **Laboratory SOPs: TA-GS-0335**
Analytical Organization	**Eurofins TestAmerica**

QC Sample	Frequency & Number	Method/SOP QC Acceptance Limits	Corrective Action	Personnel Responsible for Corrective Action	DQI	Measurement Performance Criteria
LOD determination and verification	At initial set-up and verified quarterly. If a laboratory uses multiple instruments for a given method, the LOD must be verified on each.	The apparent signal to noise ratio must be at least 3 and the results must meet all method requirements for analyte identification.	If the LOD verification fails, the laboratory must: 1) Repeat the detection limit determination and LOD verification at a higher concentration; or 2) Perform and pass two consecutive LOD verifications at a higher concentration. The LOD is set at the higher concentration.	Analyst Lab QA Officer Project Chemist	Bias/ Representativeness	QC acceptance criteria as specified by Lab SOP TA-GS-0335.
LOQ establishment and verification	At initial setup: 1) Verify LOQ; and 2) Determine precision and bias at the LOQ. Subsequently, verify LOQ quarterly. If a laboratory uses multiple instruments for a given method, the LOQ must be verified on each.	1) The LOQ and associated precision and bias must meet client requirements and must be reported; or 2) In the absence of client requirements, must meet control limits of the LCS. 3) If the method is modified, precision and bias at the new LOQ must be demonstrated and reported. See Volume 1, Module 4, Section 1.5.2 of the DoD QSM 5.3 (DoD and DOE 2019).	If the LOQ verification fails, the laboratory must either establish a higher LOQ or modify method to meet the client-required precision and bias.	Analyst Lab QA Officer Project Chemist	Sensitivity/Bias	QC acceptance criteria as specified by Lab SOP TA-GS-0335 and at least as stringent as specified by DoD QSM 5.3 (DoD and DOE 2019).
CCV)	Before sample analysis, after every 10 field samples, and at the end of the analysis sequence.	All reported analytes and surrogates within established RT windows. All reported analytes and surrogates within ± 20% of true value.	Immediately analyze two additional consecutive CCVs. If both pass, samples may be reported without reanalysis. If either fails, take corrective action(s) and re-calibrate; then reanalyze all affected samples since the last acceptable CCV.	Analyst Lab QA Officer Project Chemist	Accuracy/Precision	Results may not be reported without a valid CCV. If reanalysis cannot be performed, data must be qualified and explained in the case narrative.

QC Sample	Frequency & Number	Method/SOP QC Acceptance Limits	Corrective Action	Personnel Responsible for Corrective Action	DQI	Measurement Performance Criteria
MB	Each time samples are extracted and one per matrix per analytical method for each batch of at most 20 samples.	No analytes detected >1/2 LOQ or >1/10 the amount measured in any sample or 1/10 the regulatory limit, whichever is higher. For common lab contaminants, no analytes detected >LOQ.	Correct problem. If required, re-prep and reanalyze MB and all samples processed with the contaminated blank.	Analyst Lab QA Officer Project Chemist	Sensitivity/Bias	No analytes detected >1/2 LOQ or >1/10 the amount measured in any sample or 1/10 the regulatory limit, whichever is higher. For common laboratory contaminants, no analytes detected >LOQ.
LCS	One per batch of at most 20 samples analyzed of similar matrix per analytical method.	Per DoD QSM Appendix C Limits, Method 8015C and lab SOP TA-GS-0335.	Correct problem. If required, re-prep and reanalyze the LCS and all samples processed in the associated preparatory batch for the failed analytes.	Analyst Lab QA Officer Project Chemist	Accuracy	QC acceptance criteria at least as stringent as specified by DoD QSM 5.3 (DoD and DOE 2019).
MS/MSD pair	One per analytical method for each batch of at most 20 samples.	Per DoD QSM Appendix C Limits, Method 8015C and lab SOP TA-GS-0335 MSD or Matrix Duplicate: RPD of all analytes ≤30%.	Examine the PQOs. Notify Lab QA officer and project chemist about additional measures to be taken.	Analyst Lab QA Officer Project Chemist	Accuracy/Precision	For matrix evaluation, use QC acceptance criteria at least as stringent as specified by DoD QSM 5.3 (DoD and DOE 2019).
Surrogate spike	All field and QC samples.	Per DoD QSM Appendix C Limits, Method 8015C and lab SOP TA-GS-0335.	For QC and field samples, correct problem then re-prep and reanalyze all failed samples for failed surrogates in the associated preparatory batch, if sufficient sample material is available. If obvious chromatographic interference with surrogate is present, reanalysis may not be necessary.	Analyst Lab QA Officer Project Chemist	Accuracy/Precision/ Representativeness	QC acceptance criteria at least as stringent as specified by DoD QSM 5.3 (DoD and DOE 2019).

CCV continued calibration verification
DQI data quality indicator
LCS laboratory control sample
MB method blank
MS matrix spike
MSD matrix spike duplicate
RPD relative percent difference
RT retention time
TPH total petroleum hydrocarbons

14. Data Verification and Validation (Steps I and IIa/IIb) Process Table

Data Review Input	Description	Responsible for Verification (name, organization)	Step I/IIa/IIb [a]	Internal/ External
Laboratory system audits	Determine whether the laboratory holds a current DoD ELAP certification for all analyses to be performed for the project. Not all project analytes are DoD ELAP certified. Department of Defense (DoD) Environmental Laboratory Accreditation Program (ELAP)-accredited analytes are noted in Worksheet #15.	Project Chemist (John Fong, AECOM)	Step I	Internal
Field procedures	Determine whether field procedures are performed in accordance with this WP and prescribed procedures.	QA Program Manager (Scott Lewis, AECOM)	Step I	Internal
Field logbook and notes	Review the field logbook and any field notes on a weekly basis and place them in the project file. Copies of the field logbook and field notes will be provided to the CTO manager and included in the Field Audit Report.	Field Manager (Gavin Mura, AECOM)	Step I	Internal
Instrument calibration sheets	Determine whether instruments are calibrated and used in accordance with manufacturer's' requirements.	Project Chemist (John Fong, AECOM) & Data Validator (Stella Cuenco, LDC)	Step I	Internal & External
Chain-of-Custody forms	Review chain-of-custody completed forms and verify them against the corresponding packed sample coolers. A copy of each chain-of-custody will be placed in the project file. The original chain-of-custody will be taped inside the cooler for shipment to the analytical laboratory.	Project Chemist (John Fong, AECOM)	Step I	Internal
Sampling analytical data package	Verify all analytical data packages for completeness prior to submittal of the data to the data validator.	Project Manager (Robin Boyd, AECOM)	Step I	External
Analytes	Determine whether all analytes specified in Worksheet #15 were analyzed and reported on by the laboratory.	Project Chemist (John Fong, AECOM)	Step IIa	Internal
Chain-of-Custody and field QC logbook	Examine data traceability from sample collection to project data generation.	Project Chemist (John Fong, AECOM)	Step IIa	Internal
Laboratory data and WP requirements	Assess and document the performance of the analytical process. A summary of all QC samples and results will be verified for measurement performance criteria and completeness. Full Validation will be performed on 10% of the data and Standard Validation will be performed on 90% of the data. A report will be prepared within 21 days of receipt.	Data Validator (Stella Cuenco, LDC) & Project Chemist (John Fong, AECOM)	Steps IIa & IIb	Internal & External
TPH-DRO/LRO	Complete Procedure II-H, Level C and Level D Data Validation for Total Petroleum Hydrocarbons by SW-846 8015 (DON 2015).	Data Validator (Stella Cuenco, LDC)	Step IIa	External
Sampling plan	Determine whether the number and type of soil and groundwater samples specified in Worksheet #20 were collected and analyzed.	Project Chemist (John Fong, AECOM) & Field Manager (Gavin Mura, AECOM)	Step IIb	Internal
Field QC samples	Establish that the number of QC samples specified in Worksheet #20 were collected and analyzed.	Project Chemist (John Fong, AECOM)	Step IIb	Internal

Data Review Input	Description	Responsible for Verification (name, organization)	Step I/IIa/IIb [a]	Internal/ External
Project quantitation limits and data qualifiers	Establish that sample results met the project quantitation limits and qualify the data in accordance with Procedure II-A, Data Validation Procedure (DON 2015).	Data Validator (Stella Cuenco, LDC) & Project Chemist (John Fong, AECOM)	Step IIb	Internal & External
Validation report	Summarize outcome of data comparison to MPC in the WP. Include qualified data and an explanation of all data qualifiers.	Data Validator (Stella Cuenco, LDC)	Step IIa	External

ELAP Environmental Laboratory Accreditation Program
LDC Laboratory Data Consultants, Inc.
MPC measurement performance criteria
[a] IIa Compliance with methods, procedures, and contracts. See Table 10, page 117, UFP-QAPP manual, V.1 (DoD 2005).
IIb Comparison with measurement performance criteria in the WP. See Table 11, page 118, UFP-QAPP manual, V.1 (DoD 2005).

Appendix A: Figures

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Appendix B: NAVFAC Pacific ER Program SOPs (on CD-ROM)

I. Field Procedures

Procedure I-A Planning

Procedure I-A-5 Utility Clearance
Procedure I-A-6 Investigation-Derived Waste Management
Procedure I-A-7 Analytical Data Validation Planning and Coordination
Procedure I-A-8 Sample Naming

Procedure I-B Sampling
Procedure I-B-1 Soil Sampling
Procedure I-B-2 Geophysical Testing

Procedure I-C Well Construction and Well Development
Procedure I-C-1 Monitoring Well Installation and Abandonment
Procedure I-C-2 Monitoring Well Development
Procedure I-C-3 Monitoring Well Sampling

Procedure I-D Miscellaneous Sampling
Procedure I-D-1 Drum Sampling

Procedure I-E Soil and Rock Classification

Procedure I-F Equipment Decontamination

Procedure I-H Direct-Push Sampling Techniques

Procedure I-I Land Surveying

II. Data Validation Procedures

Procedure II-A Data Validation

Procedure II-H Level C and Level D Data Validation for Total Petroleum Hydrocarbons by SW-846 8015

III. QC Procedures

Procedure III-A Laboratory QC Samples (Water, Soil)

Procedure III-B Field QC Samples (Water, Soil)

Procedure III-D Logbooks

Procedure III-E Record Keeping, Sample Labeling, and Chain-of-Custody

Procedure III-F Sample Handling, Storage, and Shipping

Utility Clearance

1. Purpose

This standard operating procedure describes the process for determining the presence of subsurface utilities and other cultural features at locations where planned site activities involve the physical disturbance of subsurface materials. The procedure applies to the following activities: soil gas surveying, excavating, trenching, drilling of borings and installation of monitoring and extraction wells, use of soil recovery or slide-hammer hand augers, and all other intrusive sampling activities. The primary purpose of the procedure is to minimize the potential for damage to underground utilities and other subsurface features, which could result in physical injury, disruption of utility service, or disturbance of other subsurface cultural features.

2. Scope

This procedure applies to all United States Navy Environmental Restoration (ER) Program projects performed in the Naval Facilities Engineering Command, Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

3.1 Utility

For this procedure, a utility is defined as a manmade underground line or conduit, cable, pipe, vault or tank that is, or was, used for the transmission of material or energy (e.g., gas, electrical, telephone, steam, water or sewage, product transfer lines, or underground storage tanks).

3.2 As-Built Plans

As-built plans are plans or blueprints depicting the locations of structures and associated utilities on a property.

3.3 One-Call

The Utility Notification Center is the one-call agency for Oregon, Washington, Montana, and Hawaii. The Utility Notification Center is open 24 hours a day, and accepts calls from anyone planning to dig in. The phone number for the Hawaii One Call Center is 1-866-423-7287 (or 811). Additional information can be found at http://www.callbeforeyoudig.org/hawaii/index.asp.

Calling before you dig ensures that any publicly owned underground lines will be marked, so that you can dig around them safely. Having the utility lines marked not only prevents accidental damage to the lines, but prevents property damage and personal injuries that could result in breaking a line.

The following information will need to be provided when a request is placed to One-Call:

- Your name, phone number, company name (if applicable), and mailing address.
- What type or work is being done. This should be a description of the specific reason for the work, not the method used.
- Who the work is being done for.
- The county and city the work is taking place in.
- The address or the street where the work is taking place.
- Marking instructions, (specific instructions as to where the work is taking place).

Under normal circumstances it takes between 2 days to 5 days from the time you call (not counting weekends or holidays) to have the underground lines marked. Because these laws vary from state to state, exactly how long it will take depends on where your worksite is located. You will be given an exact start time and date when your locate request is completed, which will comply with the laws in your area.

In the event of an emergency (any situation causing damage to life or property, or a service outage), lines can be marked sooner than the original given time if requested, but must be handled via voice contact with One-Call.

3.4 TONING

Toning is the process of surveying an area utilizing one or more surface geophysical methods to determine the presence or absence of underground utilities. Typically, toning is conducted after identifying the general location of utilities and carefully examining all available site utility plans. Each location is marked according to the type of utility being identified. In addition, areas cleared by toning are flagged or staked to indicate that all identified utilities in a given area have been toned.

4. Responsibilities

The prime contractor CTO Manager is responsible for verifying that these utility locating procedures are performed prior to the initiation of active subsurface exploration. The CTO Manager is responsible for ensuring that all personnel involved in sampling and/or testing shall have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The onsite Field Manager (FM) and Site Safety and Health Officer (SSHO) are responsible for planning utility clearance and for locating and marking underground utilities according to this procedure.

Field personnel are responsible for the implementation of this procedure.

5. Procedures

Follow the following steps at all sites where subsurface exploration will include excavations, drilling, or any other subsurface investigative method that could damage utilities at a site. In addition to the steps outlined below, always exercise caution while conducting subsurface exploratory work.

5.1 Prepare Preliminary Site Plan

Prepare a preliminary, scaled site plan depicting the proposed exploratory locations as part of the work plan. Include as many of the cultural and natural features as practical in this plan.

5.2 Review Background Information

Search existing plan files to review the as-built plans and available geographic information system databases to identify the known location of utilities at the site. In addition, the contractor should contact the Navy RPM to obtain the most updated GIS layers. Plot the locations of utilities identified onto a preliminary, scaled site plan. Inform the CTO Manager if utilities lie within close proximity to a proposed exploration or excavation location. The CTO Manager will determine if it is necessary to relocate proposed sampling or excavation locations.

Include the utility location information gathered during investigation (e.g., remedial investigation or remedial site evaluation) work in the project design documents for removal or remedial actions. In this manner, information regarding utility locations collected during implementation of a CTO can be shared with the other contractors during implementation of a particular task order. In many instances, this will help to reduce the amount of additional geophysical surveying work the other contractor may have to perform.

Conduct interviews with onsite and facility personnel familiar with the site to obtain additional information regarding the known and suspected locations of underground utilities. In addition, if appropriate, contact shall be made with local utility companies to request their help in locating underground lines. Pencil in the dimensions, orientation, and depth of utilities, other than those identified on the as-built plans, at their approximate locations on the preliminary plans. Enter the type of utility, the personnel who provided the information, and the date the information was provided into the field log.

During the pre-fieldwork interviewing process, the interviewer will determine which site personnel should be notified in the event of an incident involving damage to existing utilities. Record this information in the field logbook with the corresponding telephone numbers and addresses.

5.3 Dig Permit

Prior to all activities requiring excavation work that may disrupt utility services, vehicular or aircraft traffic flow, protection provided by fire and intrusion alarm systems, or routine activities at Navy bases (including Joint Base Pearl Harbor-Hickam and Naval Base Guam), as well as intrusive work at Marine Corps Base Hawaii, current procedures shall be followed. The dig permit process tries to identify, as much as practical, any known, potentially hazardous work condition related to excavation activities and is intended to prevent accidents. It also informs key Navy personnel of the digging work and coordinates the required work with these activities to minimize inconveniences (JBPHH 2013).

5.4 SITE VISIT – LOCATE UTILITIES – TONING

Prior to the initiation of field activities, the field task manager or similarly qualified staff personnel shall visit the site and note existing structures and evidence of associated utilities, such as fire hydrants, irrigation systems, manhole and vault box covers, standpipes, telephone switch boxes, free-standing light poles, gas or electric meters, pavement cuts, and linear depression. Compare notes of the actual site configuration to the preliminary site plan. Note deviations in the field logbook and on the preliminary site plan. Accurately locate or survey and clearly mark with stakes, pins, flags, paint, or other suitable devices all areas where subsurface exploration is proposed. These areas shall correspond with the locations drawn on the preliminary site plan.

Following the initial site visit by the FM, a trained utility locator will locate, identify, and tone all utilities depicted on the preliminary site plan. The locator should use appropriate sensing equipment to attempt to locate utilities that might not have appeared on the as-built plans. This may involve the use of surface geophysical methods (Procedure I-B-2, *Geophysical Testing*). At a minimum, use a utility locator, metal detector, and/or magnetometer; however, it is important to consider the possibility that non-metallic utilities or tanks might be present at the site. Use other appropriate surface geophysical methods, such as Ground Penetrating Radar, if non-metallic cultural features are likely to be present at the site. Clear proposed exploration areas of all utilities in the immediate area where subsurface exploration is proposed. Clearly tone all anomalous areas. Clearly identify all toned areas on the preliminary site plan. After toning the site and plotting all known or suspected buried utilities on the preliminary site plan, the utility locator shall provide the FM with a copy of the completed preliminary site plan. Alternatively, the FM or designee shall document the results of the survey on the preliminary site plan.

Report to the FM anomalous areas detected and toned that are in close proximity to the exploration or excavation areas. The FM shall determine the safe distance to maintain from the known or suspected utility. It may be necessary to relocate proposed exploration or excavation areas. If this is required, the FM or a similarly qualified individual shall relocate them and clearly mark them using the methods described above. Completely remove the markings at the prior location. Plot the new locations on the site plan and delete the prior locations from the plan. In some instances, such as in areas extremely congested with subsurface utilities, it may be necessary to dig by hand to determine the location of the utilities.

5.5 PREPARE SITE PLAN

Prior to the initiation of field activities, draft a final site plan that indicates the location of subsurface exploration areas and all known or suspected utilities present at the site. Provide copies of this site plan to the Contracting Officer’s Representative (COR), the CTO Manager, and the subcontractor who is to conduct the subsurface exploration/excavation work. Review the site plan with the COR to verify its accuracy prior to initiating subsurface sampling activities.

6. Records

Keep a bound field logbook detailing all activities conducted during the utility locating procedure. The logbook will describe any changes and modifications made to the original exploration plan. The trained utility locator shall prepare a report and keep it in the project file. Also keep a copy of the final site plan on file.

7. Health and Safety

Field personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

Joint Base Pearl Harbor-Hickam (JBPHH). 2013. *Dig Permit Requests.* JBPHH Instruction 11013.1. 15 March 2013.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-B-2, *Geophysical Testing.*

9. Attachments

None.

Investigation-Derived Waste Management

1. Purpose

This standard operating procedure describes the activities and responsibilities of the United States (U.S.) Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific with regard to management of investigation-derived waste (IDW). The purpose of this procedure is to provide guidance for the minimization, handling, labeling, temporary storage, inventory, classification, and disposal of IDW generated under the ER Program. This procedure will also apply to personal protective equipment (PPE), sampling equipment, decontamination fluids, non-IDW trash, non-indigenous IDW, and hazardous waste generated during implementation of removal or remedial actions. The information presented will be used to prepare and implement work plans (WPs) for IDW-related field activities. The results from implementation of WPs will then be used to develop and implement final IDW disposal plans.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

This procedure focuses on the requirements for minimizing, segregating, handling, labeling, storing, and inventorying IDW in the field. Certain drum inventory requirements related to the screening, sampling, classification, and disposal of IDW are also noted in this procedure.

3. Definitions

3.1 IDW

IDW consists of all materials generated during site investigations that might be contaminated with chemicals of concern. IDW might consist of many types of potentially contaminated materials, including but not limited to, PPE, disposable sampling and decontamination equipment, investigation-derived soil, sludge, and sediment, well development and purge water, and decontamination fluids.

3.2 PPE

PPE, as defined in this procedure, refers to all disposable materials used to protect personnel from contact with potentially contaminated site media, such as inner and outer gloves, Tyvek suits and overboots, and disposable respirator cartridges. Non-consumable items, such as steel-toe boots, respirators, and hard hats are not included in this procedure.

3.3 DISPOSABLE SAMPLING EQUIPMENT

Disposable sampling equipment consists of all single-use equipment that might have come in contact with potentially contaminated site media, including sample bailers, Draeger air monitoring tubes, used soil sampling trowels and spatulas, plastic drop cloths, plastic bags and bucket liners, and sample containers from field analytical test kits.

3.4 INVESTIGATION-DERIVED SOIL, SLUDGE, AND SEDIMENT

Investigation-derived soil consists of all potentially contaminated soil that is disturbed as part of site investigation activities. The most commonly encountered form of IDW soil is drill cuttings brought to the ground surface by drilling. Other forms of disturbed soil, including trenching spoils and excess soil remaining from surface sampling, should not be stored as IDW. Excavated soil should be returned to its source if site conditions permit.

Investigation-derived sludge consists of all potentially contaminated sludge materials generated or disturbed during site investigation activities. Generated sludge might consist of drilling mud used or created during intrusive activities. Other sludge might include solvents or petroleum-based materials encountered at the bottom of storage tanks and grease traps.

Investigation-derived sediment consists of all potentially contaminated sediments that are generated or disturbed during site investigation activities. Generated sediments might include solids that settle out of suspension from well development, purge, or decontamination water (see Definitions 3.5 and 3.6) while stored in 55-gallon drums or during sample filtration. Disturbed sediments might also consist of catch basin sediments or excess sediment from surface water activities.

3.5 WELL DEVELOPMENT AND PURGE WATER

Development water consists of groundwater withdrawn from newly installed monitoring wells in preparation for well purging or pump testing. Monitoring well development methods are discussed in Procedure I-C-2, *Monitoring Well Development*.

Purge water consists of groundwater that is removed from monitoring wells immediately prior to sampling. Well purging methods are discussed in Procedure I-C-3, *Monitoring Well Sampling*. Groundwater derived during aquifer testing shall be addressed on a site-specific basis. Procedures for handling groundwater generated during aquifer testing shall be included in the WP or equivalent document for the CTO.

3.6 DECONTAMINATION FLUIDS

Decontamination fluids consist of all fluids used in decontamination procedures conducted during site investigation activities. These fluids consist of wash water, rinse water, and solvents used for the decontamination of non-consumable PPE, sampling equipment, and drilling equipment. Decontamination procedures are discussed in Procedure I-F, *Equipment Decontamination*.

3.7 NON-IDW TRASH

Non-IDW trash is all waste materials, such as waste paper, drink containers, food, and packaging, generated in the support zone that have not come in contact with potentially contaminated site media.

3.8 NON-INDIGENOUS IDW

Non-indigenous IDW consists of all waste materials from offsite sources that are generated in the transition or contamination reduction zones and have not come in contact with potentially contaminated site media. Non-indigenous IDW includes materials, such as PPE from "clean" field activities (e.g., field blank generation, water sampling events) and refuse from monitoring well installation (e.g., unused sections of well casing, used bentonite buckets, sand bags, and cement bags).

Non-indigenous waste does not include material/waste that is abandoned at the ER site (including the IDW waste storage area) by other parties not associated with the ER work. Disposal of abandoned material/waste in the vicinity of IDW is the responsibility of the property owner (e.g., Navy Region Hawaii) or party responsible for abandoning the material/waste. The ER contractor shall notify the Contracting Officer's Representative (COR) of the situation as soon as possible so that recovery actions can be coordinated by the Government.

3.9 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) HAZARDOUS WASTE

Under the RCRA, a solid waste that is not excluded from regulation is defined as hazardous if it:

- Is "listed" as a hazardous waste in Chapter 40, Code of Federal Regulations (CFR), Parts 261.31 through 261.33
- Exhibits any of four hazardous "characteristics"—ignitability, corrosivity, reactivity, or toxicity (as determined using the Toxicity Characteristic Leachate Procedure [TCLP]) (40 CFR 261.20-24)
- Is subject to certain "mixture" or "derived-from" rules (40 CFR 261.3).

Under certain circumstances, petroleum- or polychlorinated biphenyl (PCB)-contaminated wastes are not considered RCRA hazardous when they only exhibit toxicity characteristic (40 CFR 261.4(b)(10) and 261.8). If IDW is determined to be RCRA hazardous waste, then RCRA storage, transport, and disposal requirements shall apply unless exempt.

3.10 RCRA LAND DISPOSAL RESTRICTIONS (LDR)

Land disposal, as defined in RCRA, is any placement of RCRA hazardous waste on the land in a waste pile, landfill, impoundment, well, land treatment area, etc. LDRs are regulatory restrictions placed on land disposal, including pre-treatment standards, engineered containment, capacity constraints, and reporting and permitting requirements.

3.11 AREA OF CONTAMINATION (AOC)

The U.S. Environmental Protection Agency (EPA) considers the RCRA AOC to be a single land-based disposal unit, usually a "landfill," and includes non-discrete land areas in which there is generally dispersed contamination. Storing IDW in a container (i.e., portable storage devices, such as drums and tanks) within the AOC and returning it to its source, whether RCRA hazardous or not, does not trigger RCRA LDRs. In addition, sampling and direct replacement of wastes within an AOC do *not* constitute land disposal.

3.12 CERCLA Hazardous Substances

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substances are listed in 40 CFR Table 302.4 and include substances regulated by the RCRA Subtitle C, Clean Water Act (CWA), Clean Air Act (CAA), and Toxic Substances Control Act (TSCA). The CFR is updated annually; therefore, the most recent CFR should be referenced for the CERCLA hazardous waste list.

CERCLA hazardous substances are defined independent of their concentration level (i.e., any detection of a listed CERCLA constituent is considered a “CERCLA hazardous substance”). “Reportable quantities” identified for chemicals in 40 CFR Table 302.4 concern only CERCLA and RCRA requirements for notification to EPA when a release has occurred; they do not dictate whether a chemical is a hazardous substance.

The definition of CERCLA hazardous substances excludes “petroleum, including crude oil or any fraction thereof;” natural gas; natural gas liquids; liquefied natural gas; and synthetic gas usable for fuel, unless specifically listed or designated under the act. Excluded fractions of crude oil contain hazardous substances, such as benzene, that are indigenous in those petroleum substances or that are normally mixed with or added to petroleum during the refining process. However, hazardous substances that are (1) added to petroleum after the refining process, (2) increase in concentration as a result of contamination of the petroleum during use, or (3) commingled with petroleum after a release to the environment, are not considered part of the petroleum exclusion provision, and therefore, are regulated under CERCLA. In addition, some waste oils are regulated under CERCLA because they are specifically listed.

The scope of CERCLA hazardous substances includes the smaller subsets of RCRA hazardous wastes, PCB Aroclors, and other constituents. Therefore, a RCRA hazardous waste is always considered a CERCLA hazardous substance for a CERCLA-driven response action; however, a CERCLA hazardous substance is not always a RCRA hazardous waste.

CERCLA only regulates releases or threats of releases of hazardous substances into the environment. If there is no evidence that (1) a release has occurred (based on site history, visual observations, background metals evaluation), (2) there is a threat of release (as from abandoned, discarded, or non-maintained chemical receptacles), or (3) the release has entered the environment (as defined below), then CERCLA does not regulate the constituent even though it is identified on the CERCLA hazardous substance list.

3.12.1 CERCLA Hazardous Substances: TSCA/PCBs

PCBs are a CERCLA hazardous substance. PCBs belong to a broad family of man-made organic chemicals known as chlorinated hydrocarbons. PCBs were domestically manufactured from 1929 until their manufacture was banned in 1979. They have a range of toxicity and vary in consistency from thin, light-colored liquids to yellow or black waxy solids. Due to their non-flammability, chemical stability, high boiling point, and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications including electrical, heat transfer, and hydraulic equipment; as plasticizers in paints, plastics, and rubber products; in pigments, dyes, and carbonless copy paper; and many other industrial applications. Although no longer commercially produced in the United States, PCBs may be present in products and materials produced before the 1979 PCB ban.

If PCBs are detected at concentrations equal to or greater than 50 parts per million (ppm), the sample is considered TSCA-regulated. Current PCB regulations can be found in the CFR at 40 761. The EPA Q and A Manual (EPA 2009), referring to CFR 761.61 explains PCB remediation waste must be managed and disposed of based on the concentration at which the PCBs are found. It is unacceptable to dilute the as-found concentration of the contaminated soil by mixing it with clean soil during excavation or other IDW management activities.

3.13 ENVIRONMENT

Environment means navigable waters, ocean waters, surface water, groundwater, drinking water supply, land surface or subsurface strata, and ambient air, within the U.S. or under federal jurisdiction (see Section 101(8) of CERCLA or 40 CFR 300.5 for complete definition).

3.14 ONSITE AREA

The CERCLA onsite area is defined in 40 CFR 300.400(e)(1) as an area that includes:

- AOC
- All suitable areas in very close proximity to the contamination that are necessary for the implementation of the response action

The delineation of the onsite area is further discussed in Volume 55 Federal Register (FR) Page 8688 and EPA guidance.

Neither CERCLA, the National Oil and Hazardous Substances Pollution Contingency Plan, nor RCRA define the terms “area of contamination” or “contamination.” However, the area of contamination is interpreted as containing “varying types and concentrations of contaminants” (55 FR 8760) that may or may not pose a risk to human health or the environment.

The onsite area may also include several noncontiguous aerial extents of contaminations if they share a common nexus (55 FR 8690).

3.15 OFFSITE AREA

The offsite area consists of all areas outside the onsite area.

3.16 CERCLA OFFSITE RULE

The CERCLA offsite rule (400 CFR 300.440) states that IDW containing CERCLA hazardous substances (at any concentration) must be stored, treated, or disposed of offsite only at facilities having current EPA approval to accept such CERCLA wastes. RCRA-permitted facilities (Subtitle C and D) must also have specific EPA approval to accept waste generated at a CERCLA site (even if the waste is RCRA hazardous).

With some restrictions, the offsite rule does not apply to the following:

- Wastes generated during non-CERCLA actions
- Treatability study samples

- Wastes generated during emergency response actions
- Laboratory samples

CERCLA allows IDW to be managed, stored, and disposed of onsite within or near the AOC without the need for EPA approval (i.e., CERCLA facility approval) or RCRA permits. If IDW is to be stored or disposed of on site, the onsite area (and the AOC) should be delineated on a figure in the project field book and revised, based on best professional judgment, as site data become available.

4. Responsibilities

The prime contractor CTO Manager is responsible for preparing WPs and IDW disposal plans and reports in compliance with this procedure, and is responsible for documenting instances of noncompliance. The CTO Manager is responsible for ensuring that all personnel involved in sampling and/or testing shall have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager is responsible for implementing this IDW procedure and ensuring that all project field staff follow these procedures.

Field personnel are responsible for the implementation of this procedure.

5. IDW Management Procedures

The procedures for IDW management in the field are described below.

5.1 Planning for IDW Management

The project team should begin planning for IDW issues early in the site investigation planning stage. The proper management of IDW involves all of the following tasks:

- Obtain Navy approval for a designated IDW storage area prior to commencement of field work
  - Complete Navy form, including IDW Tracking Sheet and provide to remedial project manager (RPM) for processing
- Waste generation and minimization
- Chemical screening and characterization of the waste
- Waste handling, storage, and associated maintenance in compliance with all regulations (prepare an IDW drum inventory, ensure storage areas are compliant with type of waste [double containment, TSCA requirements, etc.] maintain condition of drum and labeling, maintain safety and assess controls, comply with permit requirements [for offsite storage])
- Waste transport and disposal within required holding times
- Waste tracking, documentation, record keeping, and reporting

As part of IDW planning, the CTO Manager should consult with the COR and environmental regulatory agencies to clearly identify the primary federal or state regulatory authority that is driving the site investigation. This authority may be CERCLA, RCRA (Subtitle C), RCRA (subtitle I), TSCA, CWA, or an equivalent state program. The primary investigation authority and regulations promulgated under this authority set forth requirements for IDW management. These requirements may differ under the various response authorities. For CERCLA-driven actions, IDW storage and disposal should comply with all applicable or relevant and appropriate requirements (ARARs) and to-be-considered (TBC) criteria to the extent practicable.

Lastly, the CTO Manager should consider the disposal criteria of the anticipated disposal facility when developing the sampling and analysis plan (SAP). Some offsite facilities do not accept waste that is characterized by association with samples collected from the investigation site or they may require analytical data for chemicals that are not of potential concern at the site. Facility disposal criteria may dictate laboratory reporting limits.

If unknown waste is observed onsite, notify the project RPM and COR for further instructions.

5.2 IDW MINIMIZATION

Field managers (FMs) and their designates shall minimize the generation of onsite IDW to reduce the need for special storage or disposal requirements that might result in substantial additional costs and provide little or no reduction in site risks (EPA 1992b). Reduce the volume of IDW by applying minimization practices throughout the course of site investigation activities. These minimization strategies include substitution of biodegradable raw materials; using low-volume IDW-generating drilling techniques; where possible, returning excess material to the source location; using disposable sampling equipment versus generating more decontamination fluids from reusable sampling equipment; using bucket and drum liners; and separating trash from IDW.

Material substitution consists of selecting materials that degrade readily or have reduced potential for chemical impacts to the site and the environment. An example of this practice is the use of biodegradable detergents (e.g., Alconox or non-phosphate detergents) for decontamination of non-consumable PPE and sampling equipment. In addition, field equipment decontamination can be conducted using isopropyl alcohol rather than hexane or other solvents (for most analytes of concern) to reduce the potential onsite chemical impacts of the decontamination solvent. Select decontamination solvents carefully so that the solvents, and their known decomposition products, are *not* potentially RCRA hazardous waste, unless absolutely necessary.

Give priority to drilling methods that minimize potential IDW generation. Select hollow-stem auger and air rotary methods, where feasible, over mud rotary methods. Mud rotary drilling produces waste drilling mud, while hollow stem and air rotary drilling methods produce relatively low volumes of soil waste. Use small-diameter borings and cores when soil is the only matrix to be sampled at the boring location; however, the installation of monitoring wells requires the use of larger-diameter borings.

If possible, return soil, sludge, or sediment removed from borings, containment areas, and shallow test trenches to the source immediately after sampling and/or geological logging of the soils (EPA 1991, 1992b). Immediate replacement of solid waste in the source location during investigation activities avoids RCRA LDRs, which permit movement of IDW within the same AOC without considering land disposal to have occurred, even if the IDW is later determined to contain RCRA hazardous material (EPA 1991). Place soil IDW from borings and trenches on polyethylene sheeting (e.g., Visqueen) during excavation and segregate it by approximate depth and any apparent contamination (i.e., visible staining). Following excavation, replace the soil IDW from above the saturated layer into the boring or trench and compact it, if possible. Efforts should be made to return the waste to the approximate depth from which it was generated. Soil and sludge IDW generated at or below the saturated layer of a boring or trench should be placed in drums and not returned to the source area. Suspected contaminated soil and sludge IDW generated above the saturated layer of a boring or trench should not be returned below the saturated layer."

Often monitoring wells are constructed outside the area of concern for soil contamination to sample for potential groundwater contamination or collect characteristic background data. At these locations, soil cuttings generated from above the saturation zone may be immediately disposed of near the wellhead in a shallow pit covered with natural topsoil from the site, and compacted. Contain soil and sludge IDW generated at or below the saturated layer in drums.

Reduce the quantity of decontamination rinse water generated by using dedicated and disposable sampling equipment, such as plastic bailers, trowels, and drum thieves that do not require decontamination. In general, decontamination fluids, and well development and purge water should not be minimized because the integrity of the associated analytical data might be affected.

Minimize the storage of visibly soiled PPE and disposable sampling equipment IDW by implementing decontamination procedures. If, based upon the best professional judgment of the FM, the PPE and disposable sampling equipment can be rendered non-contaminated after decontamination, then double-bag the PPE and disposable sampling equipment and dispose of it off site at a (RCRA Subtitle D) municipal solid waste disposal facility at the end of each work day (EPA 1991, 1992b). Since the decontaminated waste does not contain CERCLA hazardous substances, it need not be disposed of at a CERCLA-approved disposal facility in accordance with the CERCLA offsite rule.

Bucket liners can be used in the decontamination program to reduce the volume of solid IDW generated, and reduce costs on larger projects. The plastic bucket liners can be crushed into a smaller volume than the buckets, and only a small number of plastic decontamination buckets are required for the entire project. The larger, heavy-duty, 55-gallon drum liners can be used for heavily contaminated IDW to provide secondary containment, and reduce the costs of disposal and drum recycling. Drum liners may extend the containment life of the drums in severe climates and will reduce the costs of cleaning out the drums prior to recycling.

All waste materials generated in the support zone are considered non-IDW trash. To minimize the total volume of IDW, separate all trash from IDW, seal it in garbage bags, and properly dispose of it off site as municipal waste at the end of each work day.

Keep excess cement, sand, and bentonite grout prepared for monitoring well construction to a minimum. FMs shall observe well construction to ensure that a sufficient, but not excessive, volume of grout is prepared. Some excess grout may be produced. Unused grout (that should not come in contact with potentially contaminated soil or groundwater) shall be considered non-hazardous trash, and the drilling subcontractor shall dispose of it off site. Surplus materials from monitoring well installation, such as scrap plastic sections, used bentonite buckets, and cement/sand bags that do not come in contact with potentially contaminated soil, shall be considered non-IDW trash, the drilling subcontractor shall dispose of it off site.

Following proper segregation procedures, as discussed in the next section, can minimize the quantity of contaminated IDW generated.

5.3 SEGREGATION OF IDW BY MATRIX AND LOCATION

It is necessary to properly segregate IDW in order to:

- Avoid commingling contaminated waste with clean waste, thereby creating a larger volume of waste that must be treated as contaminated
- Facilitate the sampling, screening, classification, and disposal of waste that may require different management methods

Take efforts to segregate IDW even when these activities will increase storage container and storage space requirements. These efforts will drastically reduce the sampling and documentation required for characterizing the waste and their associated costs.

In general, segregate IDW by matrix and source location and depth at the time it is generated. IDW from only one matrix shall be stored in a single drum (e.g., soil, sediment, water or PPE shall *not* be mixed in one drum). Groundwater and decontamination water should not be commingled; however, development and purge water from the same well may be stored together.

In general, IDW from separate sources should not be combined in a single drum or stockpile. Take efforts to segregate waste by increments of depth below ground surface. Most importantly, segregate soil IDW generated at or from below the saturated zone from soil generated above this zone (soil below this zone might be impacted by contaminated groundwater, whereas soil above the zone may be “clean”). Similarly, segregate soil above and below an underground storage tank (UST). Label each drum of soil to indicate the approximate depth range from which it was generated; this task may require cuttings to be segregated on plastic sheeting as they are generated or drums to be filled during the trenching or boring operation if this can be done in a safe manner.

It is possible that monitoring well development and purge water will contain suspended solids, which will settle to the bottom of the storage drum as sediment. Include significant observations on the turbidity or sediment load of the development or purge water in the logbook see Procedure III-D, *Logbooks* and Section 5.5). To avoid mixed matrices in a single drum (i.e., sediment and water), it may be necessary to decant the liquids into a separate drum after the sediments have settled out. This segregation may be accomplished during subsequent IDW sampling activities or during consolidation in a holding tank prior to disposal.

Place potentially contaminated well construction materials in a separate drum. No soil, sediment, sludge, or liquid IDW shall be placed in drums with potentially contaminated waste well construction materials. In addition, potentially contaminated well construction materials from separate monitoring wells shall not be commingled.

Store potentially contaminated PPE and disposable sampling equipment in drums separate from other IDW. Segregate PPE from generally clean field activities, such as water sampling, from visibly soiled PPE, double-bag it, and dispose of it off site as municipal waste. Disposable sampling equipment from activities, such as soil, sediment, and sludge sampling, includes plastic sheeting used as liner material in containment areas around drilling rigs and waste storage areas, disposable sampling equipment, and soiled decontamination equipment. If, according to the Field Manager's best professional judgment, the visibly soiled PPE can be decontaminated and rendered non-hazardous, then double-bag the decontaminated PPE and disposed of it off site as municipal waste (EPA 1991, 1992b). PPE and disposable sampling equipment generated on separate days in the field may be combined in a single drum, provided clean and visibly soiled IDW are segregated as discussed above.

IDW generated from the use of field analytical test kits consists of those parts of the kit that have come into contact with potentially contaminated site media, and used or excess extracting solvents and other reagents. Contain potentially contaminated solid test kit IDW in plastic bags and store it with contaminated PPE or disposable sampling equipment IDW from the same source area as soil material used for the analyses. Segregate the small volumes of waste solvents, reagents, and water samples used in field test kits, and dispose of it accordingly (based upon the characteristics of the solvents as described in this procedure). Most other test kit materials should be considered non-IDW trash, and be disposed of as municipal waste.

Store decontamination fluids in drums separate from groundwater and other IDW. If practical, decontamination fluids generated from different sources should not be stored in the same drum. If decontamination fluids generated over several days or from different sources are stored in a single drum, record information about the dates and IDW sources represented in the drum. Note this information in the field notebook, on the drum label (Section 5.4.3), and in the drum inventory (Section 5.5).

The FM and designated personnel should separate the liquid and sediment portions of the equipment decontamination fluid present in the containment unit used by the drilling or excavation field crew. The contents of this unit normally consist of turbid decontamination fluid above a layer of predominantly coarse-grained sediment. When the contents of the containment unit are to be removed for storage in IDW drums, the FM shall instruct the field crew to place as much of the liquid into drums as possible and transfer the remaining solids into separate drums. Note observations of the turbidity and sediment load of the liquid IDW in the field notebook, on the drum label (Section 5.4.3), and in attachments to the drum inventory (Section 5.5). It is likely that decontamination fluids will contain minor amounts of suspended solids that will settle out of suspension to become sediment at the bottom of IDW storage drums. As noted above, it may be necessary to segregate the drummed water from sediment during subsequent IDW sampling or disposal activities.

Documentation for waste storage containers should include IDW source and segregation information and be maintained as follows:

1. Field logbook should be updated, at least weekly, with all IDW drum additions – update storage area location map to include new drum position and drum number.

2. External drum log (hard copy and electronic copy) should be updated with each IDW drum addition (drum numbers, source, and generation date) and closure of drum (fill date).

5.4 DRUM FILLING, HANDLING, AND LABELING, AND INVENTORYING

Drum handling consists of those actions necessary to prepare an IDW drum for labeling. Drum labeling consists of those actions required to legibly and permanently identify the contents of an IDW drum.

5.4.1 Drum Filling

Each drum of solid IDW shall be completely filled, when possible. For liquid IDW, drums should be left with headspace of approximately 5 percent by volume to allow for expansion of the liquid and potential volatile contaminants.

5.4.2 Drum Handling

IDW shall be containerized using U.S. Department of Transportation-(DOT) approved drums. The drums shall be made of steel or plastic, have a 55-gallon capacity, be completely painted or opaque, and have removable lids (i.e., United Nations Code 1A2 or 1H2). Drums having removable lids with bung holes are preferred to facilitate verification of drum contents. Typically 55-gallon drums are used, however small drums may be used depending on the amount of waste generated. New steel drums are preferred over recycled drums. Recycled drums should not be used for hazardous waste, PCBs or other regulated shipments. For short-term storage of liquid IDW prior to discharge, double-walled bulk steel or plastic storage tanks may be used. For this scenario, consider the scheduling and cost-effectiveness of this type of bulk storage, treatment, and discharge system versus longer-term drum storage.

The Guam Environmental Protection Agency may require double-walled drums or other secondary containment for the storage of liquid IDW. For long-term IDW storage at other project locations, the DOT-approved drums with removable lids are recommended. Verify the integrity of the foam or rubber sealing ring located on the underside of some drum lids prior to sealing drums containing IDW liquids. If the ring is only partially attached to the drum lid, or if a portion of the ring is missing, select another drum lid with a sealing ring that is in sound condition.

To prepare IDW drums for labeling, wipe clean the outer wall surfaces and drum lids of all material that might prevent legible and permanent labeling. If potentially contaminated material adheres to the outer surface of a drum, wipe that material from the drum, and segregate the paper towel or rag used to remove the material with visibly soiled PPE and disposable sampling equipment. Label all IDW drums and place them on appropriate pallets prior to storage.

5.4.3 Drum Labeling

Proper labeling of IDW drums is essential to the success and cost-effectiveness of subsequent waste screening and disposal activities (see Attachment I-A-6-1 and Attachment I-A-6-2). Labels shall be permanent and descriptive to facilitate correlation of field analytical data with the contents of individual IDW drums. Label all IDW drums using the **three distinct labeling methods** described below to ensure durability of the information. These three methods are completing and affixing preprinted NAVFAC Pacific ER Program labels; marking information on drum surfaces with paint; and, affixing aluminum tags to the drum. **Use of the preprinted labels, painted labeling, and aluminum tags is *mandatory***. These methods are described below.

5.4.3.1 PREPRINTED LABELS

Complete **two** preprinted NAVFAC Pacific ER Program drum labels as described below and presented in Attachment I-A-6-1. Seal both labels in separate heavy-duty, clear plastic bags, or use permanent markers on weatherproof stickers, to prevent moisture damage.

1. Place one label on the outside of the drum with the label data facing outward. Affix the bag/sticker to the drum at the midpoint of the drum height using a sufficient quantity of adhesive tape (e.g., duct tape, packing/strapping tape) so the bag will remain on the drum as long as possible during storage.

2. Affix the second label (sealed as mentioned above) to the underside of the drum lid, sealing it inside the drum when the lid is replaced.

The use of two or more preprinted labels for outer IDW drum identification purposes should be considered as a short-term backup to the information on the aluminum tags discussed below.

Print the requested information legibly on the drum labels in black, indelible ink. Instructions for entering the required drum-specific information for each label field are presented below:

CTO: Enter the four-digit number of the CTO for the project during which the IDW was generated. Include any initial zeroes in the CTO number (e.g., CTO 0047).

Activity-Site: Enter the name of the Navy activity responsible for the project site (e.g., Naval Supply Center, Naval Facilities Engineering Command Hawaii) and the name of the site where the project is taking place (e.g., Orote, Landfill, Building [Bldg.] 18).

Drum#: Enter the drum identification number according to the convention described below.

(xxxx-AA-DMzzz);

Where:

xxxx	represents the four-digit CTO number
AA	represents the unique site identifier assigned by the CTO Manager for multiple site CTOs (e.g., for CTO 0047, OW denotes Old Westpac, OR denotes Orote)
DM	represents a *drum* identification number
zzz	the sequential drum number for the site, beginning with 001

Date Collected: Enter the date the IDW was generated and placed in the drum. If IDW was generated over a number of days, enter the start and end dates for the period.

Contents: Record the source identification number on the label. Enter a "√" in the box corresponding to the type of IDW placed in the drum. For "Soil" and "Water," use the line provided to record observations on the condition of the drum contents (e.g., diesel odor, high turbidity, specific liquid IDW type). Check "Solid Waste" for PPE and indicate that PPE is present in the drum. Check

"Other" for disposable sampling equipment and potentially contaminated monitoring well construction materials, and indicate the type of waste on the line provided.

Project Type: Enter a "√" in the box corresponding to the type of investigation. Choices are Remedial Investigation, RCRA Facility Inspection, UST, and Other. If "Other" is specified, indicate the type of project in the "Comments" area, as described below.

Comments: Enter any additional information regarding the drum contents that will assist individuals who will characterize and dispose of the contents of the drum. "Other" project types include Site Inspection, Feasibility Study, Removal/Remedial Action, and Emergency Response activity. In addition, use this space on the label to complete any descriptions that were too large to fit in preceding label fields, such as the turbidity of decontamination water or the site activities from which the PPE was generated.

For Information Contact: Enter the project COR activity / code, address, and phone number.

It is essential that all relevant information recorded on individual drum labels be repeated in the field notebook for later development of the drum inventory database (see Section 5.5 and Procedure III-D, *Logbooks*).

5.4.3.2 Painted Labels

The second method for labeling drums is to paint label information directly on the outer surface of the drum. At a minimum, the information placed on the drum shall include the CTO number, the drum number (following the numbering convention given above), the source identification number and type, the generation date(s), and the telephone number provided at the bottom of the preprinted label appropriate for the project location. The drum surface shall be dry and free of material that could prevent legible labeling. Confine label information to the upper two-thirds of the total drum height. The top surface of the drum lid may be used as an additional labeling area, but this area should only be used *in addition* to the upper two-thirds of the sides of the drum. The printing on the drum shall be large enough to be easily legible. Yellow, white, black, or red paint markers (oil-based enamel paint) that are non-photodegradable are recommended to provide maximum durability and contrast with the drum surface.

5.4.3.3 Aluminum Tags

The third method for labeling drums is to affix an aluminum tag to the drum with neatly printed information that shall consist of the **CTO number**, the **drum identification number**, the **type of contents**, the **generation date(s)**, the **source** identification number and type, and the **telephone number** provided at the bottom of the appropriate preprinted label. Attachment I-A-6-2 to this procedure presents an example of the aluminum tag, which shall measure approximately 1 inch by 3 inches, or larger. When a ballpoint pen is used to fill out the aluminum tag, the information is permanently recorded as indentations on the tag. A fine ballpoint pen shall be used, and block-printed lettering is required for legibility. Indentations on the tag shall be sufficiently deep to be legible after the label has been exposed to weathering for an extended period.

Complete aluminum tags after the drum has been sealed. Affix the tags to the drum using a wire, which passes through predrilled holes in the label and shall be wrapped around the bolt used to seal the drum lid. The wire is the most likely part of the aluminum tag to decay during exposure. Use of plastic insulated, copper-core electrical wire of appropriate diameter is recommended if long-term exposure to severe weathering is anticipated.

5.4.3.4 WASTE LABELS

Standard green and white non-hazardous and/or other hazardous waste stickers may be used in conjunction with, but not in lieu of, the above labeling procedures.

5.5 DRUM INVENTORY

Accurate preparation of an IDW drum inventory is essential to all subsequent activities associated with IDW drum tracking and disposal. Prepare an inventory for each project in which IDW is generated, stored, and disposed of. This information provided in the inventory report constitutes the results of preparing and implementing an IDW sampling, screening, characterization, and disposal program for each site.

The drum inventory information shall include 10 elements that identify drum contents and indicate their outcome. These elements are discussed in Sections 5.5.1 through 5.5.10.

5.5.1 Navy Activity (Generator)/Site Name

Inventory data shall include the Navy activity and the site name where the IDW was generated (e.g., Fleet Industrial Supply Center Pearl/Red Hill, Naval Magazine Headquarters/USTs).

5.5.2 CTO Number

Inventory data shall include the four-digit CTO number associated with each drum (e.g., 0089) and contract number as necessary.

5.5.3 Drum Number

Include the drum number assigned to each drum in the inventory database. Drum numbers shall adhere to the numbering convention presented in Section 5.4.3.1 (e.g., 0091-LF-DM006).

5.5.4 Storage Location Prior to Disposal

Include the storage location of each drum prior to disposal in the inventory database (e.g., Bldg. 394 Battery Disassembly Area, or Adjacent to West end of Bldg. 54). As part of the weekly inventory, a site visit to the IDW storage location shall be performed to observe the condition of the drums and covers. Drums and covers are considered acceptable when the integrity of the drums and covers are structurally intact, drum identification is legible, and the location of the drum storage is secure. An unacceptable classification will require recommendations to remedy the unacceptable classification.

5.5.5 Origin of Contents

Specify the source identification of the contents of each IDW drum in the inventory database (e.g., soil boring number, monitoring well number, sediment sampling location, or the multiple sources for PPE- or rinse water-generating activities).

5.5.6 IDW Type

Inventory data shall include the type of IDW in each drum (e.g., soil, PPE, disposable sampling equipment, sludge, sediment, development water, steam cleaning water, decontamination rinse water).

5.5.7 Waste Volume

Specify the amount of waste in each drum in the inventory database as a percentage of the total drum volume or an estimated percentage-filled level (e.g., 95 percent maximum for liquid IDW).

5.5.8 Generation Date

Inventory data shall include the date IDW was placed in each drum. If a drum contains IDW generated over more than one day, the start date for the period shall be specified in dd-mmm-yy format. This date is *not* to be confused with a RCRA hazardous waste accumulation date (40 CFR 262).

5.5.9 Expected Disposal Date

Specify the date each drum is expected to be disposed of as part of the inventory in mmm-yy format. This date is for the Navy's information only and shall not be considered contractually binding.

5.5.10 Actual Disposal Date

The actual drum disposal date occurs at the time of onsite disposal, or acceptance by the offsite treatment or disposal facility. Enter this date in the drum inventory data base only when such a date is available in dd-mmm-yy format.

Information required to complete all 10 of the inventory elements for the monthly inventory report described above and summarized in Attachment I-A-6-3, will be located on the IDW labels or provided by the CTO Manager.

Actual disposition of the IDW drum contents will be provided to the Navy.

5.6 IDW CLASSIFICATION

In general, the CTO Manager should follow IDW classification guidance contained in the *Generic IDW Disposal Plans* for Hawaii and Guam (Ogden 1994, 1995) and EPA guidance (EPA 1991, 1992a). The IDW classification process consists of chemical screening and characterization of the waste.

Various federal and state laws and guidance contain requirements for IDW management (handling, storage, transport, disposal, and recordkeeping) based on the type(s) and concentrations of chemicals present in the waste. To ensure that IDW is managed in compliance with these requirements and to evaluate disposal options, the CTO Manager should

- Directly sample and analyze the IDW or associate it with historical data, observed site conditions, and/or samples collected on site at the source of the waste
- Screen the waste to identify the maximum concentrations of individual chemicals in, or associated with, the waste

- Screen waste constituents against chemical background data, if available
- Characterize the waste based on regulated groups of chemical constituents present in the waste
- Screen waste constituents against risk-based health criteria, ARARs, and TBC criteria for onsite disposal, or disposal facility criteria for offsite disposal

Each of the above steps is distinct and should be performed separately to avoid potential mistakes in the IDW classification process. The following subsections discuss these steps in greater detail.

5.6.1 IDW Sampling and Chemical Screening

IDW should be screened to identify chemicals present in the waste and their maximum concentrations. Screening may be facilitated by (1) directly sampling the waste, (2) associating the waste with analytical results from samples collected at the source of the IDW (e.g., a well boring), (3) visual observation of the waste, (4) historical activity data from the site, or (5) a combination of these methods (e.g., association with limited sampling). Composite sampling may be required if the unit volume of IDW is non-homogeneous. Data from samples collected directly from the IDW should take precedence over associated site sample data when making waste management decisions. Procedure I-D-1, *Drum Sampling* discusses methods for drum sampling.

Typically, IDW is screened for chemicals of potential concern at the site and against background data if available. If IDW is generated from outside the suspected AOC (e.g., soil cuttings from the installation of a background monitoring well), assume it is clean, and dispose of it accordingly.

The CTO Manager should consider the disposal criteria of any offsite disposal facility anticipated to be used when developing the SAP. Some offsite facilities do not accept waste that is characterized by association with samples collected from the investigation site or they may require analytical data for chemicals that are not of potential concern at the site. Direct sampling and analysis of the waste may be required for these other constituents. Some disposal facilities prefer to collect and analyze the samples themselves. In addition, disposal facility criteria may dictate laboratory reporting limits. When possible, the CTO Manager should coordinate sampling and data requirements with the disposal subcontractor and anticipated disposal facility. Such efforts may allow IDW sampling to be conducted while the field team is mobilized for the site investigation, rather than conducting a separate IDW sampling event later.

5.6.2 IDW Characterization

Various federal and state laws and guidance contain requirements for IDW management (handling, storage, transport, disposal, and recordkeeping) based on the particular constituent or *group(s) of chemical constituents* present in the waste. Therefore, to ensure that IDW is managed in compliance with these requirements, characterize IDW based on the chemical screening results to determine whether any of the following regulated constituents are present in the waste:

- Petroleum hydrocarbons (regulated by RCRA Subtitle I when released from a UST; see 40 CFR Part 280)
- Hazardous wastes (regulated by RCRA Subtitle C; see 40 CFR 261-299)
- Non-hazardous, solid wastes (regulated by RCRA Subtitle D; see 40 CFR 257-258)

- Hazardous substances and commingled petroleum (regulated by CERCLA; see 40 CFR 300.400 and 302.4)
- PCBs (regulated by TSCA; see 40 CFR 700)
- Asbestos (regulated by CAA for disposal; see 40 CFR 61, Subpart M)
- Radioactive wastes (regulated by the Nuclear Regulatory Commission; see 10 CFR [various parts], 40 CFR, Subchapter F, and other applicable laws)

EPA regulations and guidance do not require IDW to be tested to properly characterize it. Instead waste may be characterized based on historical site data, site observations, analytical data from the source of the IDW, and professional judgment (EPA 1991). Specifically, the EPA has indicated that IDW may be assumed not to be "listed" wastes under RCRA unless available information about the site suggests otherwise (53 FR 51444). Similarly, RCRA procedures for determining whether waste exhibits RCRA hazardous characteristics do not require testing if the decision can be made by "applying knowledge of the hazard characteristic in light of the materials or process used" (40 CFR 262.11(c); EPA 1991). If applicable, the disposal plans and reports should state, "there is no evidence based on site data and observations that the IDW contains listed RCRA wastes or exhibits RCRA characteristics."

For soil IDW, the potential for exhibiting toxicity may be determined by comparing constituent concentrations in the waste against screening values that are 20 times the TCLP criteria as specified in Section 1.2 of EPA Method Solid Waste-846 1311 *Toxicity Characteristic Leaching Procedure* (EPA 2007). Otherwise, samples associated with the soil can be tested using the TCLP.

5.7 IDW Storage

In general, the CTO Manager should follow IDW storage guidance contained in the *Generic IDW Disposal Plans* for Hawaii and Guam (Ogden 1994, 1995) and EPA guidance (EPA 1990, 1991, 1992a).

Always store IDW in a manner that is secure, protected from weather, and protective of human health and the environment. It is preferable to store IDW within the AOC(s) or on site; however, the Navy may assign a specific IDW storage area away from the project site.

If the IDW is determined to be RCRA hazardous, then RCRA storage, transport, and disposal requirements may apply, including a limited **90-day** storage permit exemption period prior to required disposal. If onsite disposal is an option, store RCRA waste within the AOC so that RCRA LDRs will not apply in the future. LDRs may be triggered if the waste is stored within the onsite area, but outside of the AOC or if the waste is removed from and later returned to the AOC for disposal. The AOC concept does not affect the approach for managing IDW that did not come from the AOC, such as PPE, decontamination equipment and fluids, and groundwater. If RCRA hazardous, these wastes must be managed under RCRA and drummed and disposed of off site (EPA 1991).

RCRA waste should not be stored within the AOC prior to disposal when professional judgment suggests the IDW might pose an immediate or permanent public endangerment (EPA 1991b).

Offsite storage of CERCLA waste must comply with the CERCLA offsite rule (40 CFR 300.440).

If the IDW is determined to be TSCA-regulated, then TSCA storage requirements as described in CFR 764.65, transport, and disposal requirements apply, including a limited **30-day** storage period prior to required disposal. Storage requirements are as follows:

1. Storage facilities must provide an adequate roof and walls to prevent rain water from reaching the stored PCBs.

2. Storage facilities must provide an adequate floor that has continuous curbing with a minimum 6-inch-high curb.

3. Storage facilities must contain no drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area.

4. Storage facilities must provide floors and curbing constructed of continuous smooth and impervious materials to minimize penetration of PCBs.

5. Storage facilities must not be located at a site that is below the 100-year flood water elevation.

6. PCBs in concentrations of 50 ppm or greater must be disposed of within 1 year after being placed in storage.

PCB waste can also be stored in a RCRA-approved waste storage area for 30 days from date of generation.

NAVFAC Pacific requires that all CERCLA, RCRA, and other types of waste be removed from JBPHH areas within 90 days of its generation, particularly within the shipyard area, and 30 days of generation for TSCA waste. Efforts should also be made to dispose of IDW within the 30- and 90-day periods at other Navy installations, unless the IDW will be managed with remediation waste to be generated during a cleanup action in the near future. The Navy may approve extensions of the storage time limit for wastes that are non-hazardous on a project-specific basis.

5.7.1 Drum Storage

Implement drum storage procedures to minimize potential human contact with the stored IDW and prevent extreme weathering of the stored drums. Place all IDW drums upright on pallets before the drums are stored. RCRA storage requirements include the following: containers shall be in good condition and closed during storage; wastes shall be compatible with containers; storage areas shall have a containment system; and spills or leaks shall be removed as necessary.

Place all IDW drums generated during field activities at a single AOC or designated IDW storage area together in a secure, fenced onsite area to prevent access to the drums by unauthorized personnel. When a secure area is not available, place drums in an area of the site with the least volume of human traffic. At a minimum, place plastic sheeting (or individual drum covers) around the stored drums. Post signage at the IDW storage area stating that drums should not be removed from the area without first contacting the Navy COR.

Liquid IDW drums must be stored under secondary containment (either secondary containment pallets or handmade plastic sheeting/polyvinyl chloride frame containment) and all IDW drums (soil and water) must utilize secondary containment when stored within 15 feet of a surface water body or storm drain inlet.

Drums from projects involving multiple AOCs shall remain at the respective source areas where the IDW was generated. IDW should not be transferred off site for storage elsewhere, except under rare circumstances, such as the lack of a secure onsite storage area.

Implement proper drum storage practices to minimize damage to the drums from weathering and possible human exposure to the environment. When possible, store drums in dry, shaded areas and cover them with impervious plastic sheeting or tarpaulin material. Make every effort to protect the preprinted drum labels from direct exposure to sunlight, which causes ink on the labels to fade. In addition, store drums in areas that are not prone to flooding. Secure the impervious drum covers appropriately to prevent dislodging by the wind. It may be possible to obtain impervious plastic covers designed to fit over individual drums; nonetheless, repeat the labeling information on the outside of these opaque covers.

Drums in storage shall be placed with sufficient space between rows of drum pallets and shall not be stacked, such that authorized personnel may access all drums for inspection. Proper placement will also render subsequent IDW screening, sampling, and disposal more efficient when individual drum removal is necessary. It is recommended that IDW drums be segregated in separate rows/areas by matrix (i.e., soil, liquid or PPE/other).

If repeated visits are made to the project site, inspect the IDW drums to clear encroaching vegetation, check the condition and integrity of each drum, secondary containment if applicable, check and replace aluminum tags as necessary, and replace or restore the tarpaulin covers.

5.7.2 IDW Stockpiles

Consider IDW stockpiling only when a very large quantity of IDW will be generated. Segregate stockpiled IDW, and inventory it by source location and depth to the extent practicable. Stockpiling and media mixing should not be used as methods to dilute chemical concentrations in the waste. Line stockpiles on the bottom, cover it with sturdy plastic, and locate it in areas where weather elements (e.g., wind, rainfall runoff) will not cause migration of the waste. Never dispose of liquid IDW on a stockpile; drum or store liquid waste in other appropriate containers. Follow applicable regulation and guidance when sampling stockpiled waste for characterization purposes.

5.8 IDW Disposal

Various methods and requirements for onsite and offsite disposal of IDW are discussed in the *Generic IDW Disposal Plans* for Hawaii and Guam (Ogden 1994, 1995) and EPA guidance (EPA 1990, 1991, 1992b). This section explains the disposal evaluation process and highlights some of the more important requirements for onsite and offsite IDW disposal options.

IDW sampling, characterization, and disposal analysis, particularly for onsite disposal, can be unexpectedly complex and require compliance with many different laws (that act as ARARs for IDW management and disposal). Before preparing the IDW disposal plan, compare estimated costs for onsite vs. offsite disposal. Offsite disposal may be more cost effective than devising and documenting the justification for onsite disposal when the quantity of IDW is small (less than 10 drums) and/or the waste fails the initial conservative screening against conservative risk-based criteria. Also weigh cost savings against the policy preference of the EPA and State of Hawaii Department of Health to manage and dispose of IDW on site, when possible.

5.8.1 Onsite Disposal

In general, the EPA preference is to dispose of IDW on site when the disposal action:

- Does not pose an unacceptable long-term risk to human health and the environment
- Is in accordance with chemical-, location- and action-specific ARARs “to the extent practicable” (40 CFR 300.415(i); 55 FR 8756)
- Does not introduce contaminants into clean soil or other site media
- Does not mobilize or significantly increase concentrations of any hazardous constituents already present in the environment
- Is consistent with the final remedy planned for the site
- Takes into account any community concerns regarding waste storage and the disposal method

Base onsite disposal options on best professional judgment and available site-specific data. For some projects, it may be prudent to store the waste temporarily until additional site data become available (e.g., sample analytical data, preliminary risk-assessment results, AOC delineation, and establishment of background values). Factors to consider include, but are not limited to the following:

- The detected or suspected contaminants, their concentrations, and total volume of IDW
- Media potentially affected (e.g., groundwater drinking source)
- Background metals data for site media
- Site access, conditions, and potential receptors
- Current and future land use
- Public perceptions (especially if drum storage and/or disposal takes place in open view)
- Time limits for IDW storage
- Potential requirements to treat waste before disposing of it on site
- Lack of unpaved areas to disposed of waste on site
- Potential wind, erosion, runoff, or flood conditions that might cause offsite migration of disposed waste
- Proximity to the ocean, surface water, or environmentally sensitive habitats
- Natural attenuation processes
- Need for additional utility survey before excavating to backfill waste
- Need for land use controls required to limit exposure pathways (e.g., backfill waste, provide permanent security around site, replant site to prevent erosion)

Protection of human health can be evaluated by comparing chemical concentrations in the waste to the more conservative of EPA residential regional screening levels), environmental action levels, and chemical-specific ARARs and TBC criteria. Ecological receptors can be protected by screening the IDW against EPA ecological soil screening levels. Onsite disposal of surface and groundwater IDW can be evaluated by initially screening against EPA tap-water PRGs, State Safe Drinking Water Standards (maximum contaminant levels and non-zero maximum contaminant level goals), and/or State Surface Water Quality Standards. These criteria are not always ARARs for the disposal method or site conditions; however, they may be useful to affirmatively show that the disposal is protective. Alternatively, the IDW may be associated with human-health and eco-risk assessment results for the site if the onsite placement of IDW is consistent with exposure pathway assumptions made during the risk assessment (e.g., contaminated soil might not present an unacceptable health risk at depth, but could pose such a risk if disposed of at the ground surface).

In general, return IDW consisting of environmental media to or near its source, and return waste generated from depth to its original depth, if possible and approved by NAVFAC in advance. Bury all contaminated soil and water IDW to be disposed of on site below grade at a depth of at least 3 feet and cover it with clean soil to reduce the potential for future exposure to human and ecological receptors.

Dispose of non-indigenous IDW and contaminated decontamination fluids off site. The cleaning detergent Alconox, often used in the decontamination process, is itself non-hazardous and biodegradable. Small quantities of clean decontamination water containing Alconox may be disposed of to clean areas on site. If onsite disposal is appropriate for RCRA IDW, this waste should be disposed of within the AOC to avoid the need to comply with LDRs.

IDW from several non-contiguous onsite areas may be consolidated and disposed of at one of the areas, provided a nexus exists between the wastes generated and response projects (55 FR 8690-8691).

IDW may also be temporarily disposed of back to the AOC without detailed analysis or documentation if the waste will be addressed with other site contamination during a future response action and will not present a significant short-term threat to human health and the environment.

5.8.2 Offsite Disposal

If onsite disposal is not a viable option, dispose of the IDW at an appropriate offsite treatment and/or disposal facility. Offsite transport and disposal of IDW must comply with all applicable laws and criteria specific to the chosen disposal facility. These requirements may include, but are not limited to the following:

- RCRA LDRs
- RCRA waste storage permits and time limits
- National Pollutant Discharge Elimination System and sewer disposal criteria
- CERCLA offsite rule
- TSCA treatment requirements
- DOT hazardous material transport packaging, manifesting, and security provisions

- International Maritime Organization ocean transport rules
- Certifications and training for waste transport contractors
- State notification requirements when importing certain types of waste

The CERCLA offsite rule (40 CFR 300.440) requires that CERCLA waste be disposed of only at facilities specifically approved by the EPA to receive such waste for treatment, storage, or disposal. The acceptability status of a disposal facility can change quickly (e.g., if there is a release at the facility); therefore, the CTO Manager should contact the EPA Region 9 CERCLA Offsite Rule Coordinator no more than 60 days prior to disposal of the IDW to verify the facility's approval status. The offsite rule applies to any CERCLA-driven remedial or removal action involving the offsite transfer of waste containing hazardous substances regardless of the concentrations present.

RCRA hazardous waste manifests must always be signed by authorized Navy personnel. In some cases, the Navy may authorize contractors to sign non-hazardous manifests. Navy authorization to allow contractor signature of non-hazardous manifests shall be based upon a Navy review of the contractor's RCRA and DOT training records. In addition, the Navy shall always be allowed the opportunity to review/approve non-hazardous manifests and waste profiles prior to waste disposal efforts.

Disposal of liquid IDW into the Navy sanitary sewer shall occur only if first approved by the Navy. Requests for disposal to Navy facilities should be coordinated through the COR. Discharge to the public sewer system is discouraged and should occur only if approved by state and local government agencies.

5.9 RECORDS

The CTO Manager is responsible for completing and updating the site-specific IDW drum inventory spreadsheet and submitting it as needed, and reviewing the IDW disposal plan (IDW disposal paperwork).

FMs and designates are responsible for documenting all IDW-related field activities in the field notebook including most elements of the IDW drum inventory spreadsheet. The correct methods for developing and maintaining a field notebook are presented in Procedure III-D, *Logbooks*.

Guidance related to preparing an IDW disposal plan (if required) is presented in the *Generic IDW Disposal Plans* for Hawaii and Guam (Ogden 1994, 1995).

5.9.1 IDW Disposal Documentation

Upon receipt of analytical data from the investigation or from IDW-specific analytical data, the generator information request form will be completed and provided to the IDW subcontractor to begin IDW characterization. Completed IDW disposal paperwork received from the IDW subcontractor should be reviewed for accuracy prior to submitting for Navy review.

The CTO Manager is responsible for submitting backup documentation (actual site or drum sampling results) along with the IDW disposal paperwork to the Navy.

Navy-approved contractor personnel may sign non-hazardous waste IDW documentation. Hazardous waste IDW documentation must be signed by an authorized Navy Environmental Coordinator.

All manifests (non-hazardous and hazardous) must be tracked, and if completed manifests (signed by disposal facility) are not received within 30 days of initial transportation, then contractor must notify the RPM weekly of the shipping status (e-mail is acceptable). Hazardous waste must be disposed of within 45 days of initial transportation. If not, specific IDW transportation details must be supplied to the Navy in order to prepare and file an exception report.

TSCA-regulated waste must be physically destroyed and or buried within 1 year of generation (date placed in IDW drum). Disposal certificates should be provided by the waste facility to the IDW subcontractor and Navy contractor.

Following disposal of IDW, the CTO Manager should prepare a short IDW disposal report summarizing the disposal operation and appending any associated records (e.g., final drum log, waste profiles, transport manifests, bills of lading, disposal facility certifications). Minimal topics to include in the report:

- IDW inventory and storage
- IDW chemical screening and characterization
- IDW transport and disposal
- Manifests
- Drum storage photographs
- Site figure

6. Health and Safety

Field Personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

7. References

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

Environmental Protection Agency, United States (EPA). 1990. *Guidance on Remedial Actions for Superfund Sites with PCB Contamination*. EPA/540/G-90-007. OSWER 9355.4-01. Office of Solid Waste and Emergency Response. August.

———. 1991. *Management of Investigation-Derived Wastes During Site Inspections.* EPA-540-G-91-009. Office of Emergency and Remedial Response. May.

———. 1992a. *Guidance for Performing Site Inspections under CERCLA.* EPA/540/R-92/021. Office of Emergency and Remedial Response. September.

———. 1992b. *Guide to Management of Investigation-Derived Wastes.* Quick reference fact sheet. OSWER Dir. 9345.3-03FS. Office of Solid Waste and Emergency Response. January.

———. 2007. *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846.* 3rd ed., Revision 6. Office of Solid Waste. November. On-line updates at: http://www.epa.gov/epawaste/hazard/testmethods/sw846/online/index.htm.

———. 2009. *Revisions to the PCB Q and A Manual*. January.

Ogden Environmental and Energy Services Company, Inc. (Ogden). 1994. *Final Generic IDW Screening, Sampling, Analysis, and Disposal Plan for Various Guam Naval Installations*. Pearl Harbor, HI: Pacific Division, Naval Facilities Engineering Command. September.

———. 1995. Generic IDW Screening, Sampling, Analysis, and Disposal Plan for Various Hawaii Naval Installations. Pearl Harbor, HI: Pacific Division, Naval Facilities Engineering Command. April.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-C-2, *Monitoring Well Development*.

Procedure I-C-3, *Monitoring Well Sampling*.

Procedure I-D-1, *Drum Sampling.*

Procedure I-F, *Equipment Decontamination*.

Procedure III-D, *Logbooks.*

8. Attachments

Attachment I-A-6-1: IDW Drum Label

Attachment I-A-6-2: Drum Label – Aluminum Tag

Attachment I-A-6-3: Monthly IDW Drum Inventory Updates

Attachment I-A-6-1
IDW Drum Label

IDW Drum Label

Contract #:

CTO #:

ACTIVITY SITE:

(_ _ _ _ - _ _ - D M _ _ _)
DRUM #
DATE COLLECTED

CONTENTS: (please ✓ and explain)

☐ Soil

☐ Water

☐ Solid Waste

☐ Other

PROJECT TYPE

☐ RI ☐ RFI ☐ UST ☐ Other

COMMENTS:

FOR INFORMATION CONTACT:

COR Activity/ Code:

Address:

Telephone:

Attachment I-A-6-2
Drum Label - Aluminum Tag

Drum Label - Aluminum Tag

Attachment I-A-6-3
Monthly IDW Drum Inventory Updates

Table I-A-6-1: Monthly IDW Drum Inventory Updates

Navy Activity / Site Name (Generator Site)	CTO Number (0bbb)	Drum Number (xxxx-AA-DMzzz)	Drum Storage Location	Origin of Contents (Source ID #)	IDW Type	Waste Volume (Fill level %)	Waste Generation Date (dd-Mon-yy)	Expected Disposal Date (Mon-yy)	Actual Disposal Date (dd-Mon-yy)
Inspector:									
Date of Inspection:									
NSC Pearl Harbor/ Landfill	0068	0068-LF-DM001	NSC, Bldg 7	SB-1	Soil Cuttings	100	16-Dec-92	Dec-93	N/A
		0068-LF-DM002	N/A	MW-1 MW-2 MW-3	Purge Water	75	20-Dec-92	Jul 93	26-Jul-93
		0068-LF-DM003	N/A	MW-1 MW-2 MW-3	Decon. Water	95	20-Dec-92	Jul-93	26-Jul-93
		0068-LF-DM004	NSC, Bldg.16	SB-1 SB-2 SB-3 SB-4 MW-1 MW-2 MW-3	PPE	50	16-Dec-92	Oct-93	N/A
NAVSTA Guam/ Drum Storage	0047	0047-DS-DM001	Hazmat Storage Area	SB-1 SB-2	Soil Cuttings	100	18-Feb-93	Sep-93	N/A

N/A Not Applicable

Analytical Data Validation Planning and Coordination

1. Purpose

This standard operating procedure describes data validation planning and coordination for all United States Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific sampling projects involving data validation.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

3.1 Critical Samples

Critical samples are samples that are especially important for assessing exposure and/or risk at a particular site, or are key in identifying remedial options.

3.2 Data Quality Assessment Report

The data quality assessment report summarizes the QA/quality control (QC) evaluation of the data according to precision, accuracy, representativeness, completeness, and comparability relative to the Project Quality Objectives (PQOs). The report provides a quantitative and qualitative assessment of the data and identifies potential sources of error, uncertainty, and bias that may affect the overall usability.

3.3 Data Validation

Data validation is a process that determines the technical usability of analytical data by comparison with a set of performance criteria. The performance criteria are designed in a manner that will enable the data user to know if the set of data will meet the intended purpose.

3.4 Data Validation Strategy

The data validation strategy includes the percentage of data to be validated (e.g., 100 percent or a smaller percentage), all samples from an entire sample delivery group (SDG) versus selected samples from various SDGs, and whether samples for Level D validation will be identified in advance or only after critical or risk-driving results for the risk assessment have been identified.

3.5 DATA VALIDATION LEVELS

The level of data validation possible for a given set of samples is based on the level of data package provided by the laboratory. The three levels of data validation considered are Level B (requires a Level 2 data package), Level C (requires a Level 3 data package), and Level D (requires a Level 4 data package). These levels have been identified in previous standard operating procedures as Cursory (Level B), Standard (Level C), and Full (Level D). Description for the extent of each level of data validation is presented below and further in Procedure II-A, *Data Validation*.

3.6 RAW DATA

Raw data is information that has not been processed, formatted, or reduced for end use. Examples of raw data include gas chromatographs, instrument printouts, copies of log books, chemist worksheets, etc.

3.7 SAMPLE DELIVERY GROUP (SDG)

A SDG, or analytical batch, typically includes up to 20 field samples plus associated batch QC samples.

4. Responsibilities

The prime contractor CTO Manager shall ensure coordination between data validators and appropriate project personnel. The CTO Manager is responsible for critical sample selection. The project chemist, laboratory coordinator, or other designated person, shall coordinate with the data validation task leader.

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

5. Procedures

An independent party who is not responsible for the generation of the data shall perform data validation. Section 5.1 discusses guidelines for selecting a data validation strategy, while Section 5.2 presents planning and coordination guidelines.

5.1 DATA VALIDATION STRATEGY SELECTION

Consult the Contracting Officer's Representative, any appropriate regulatory agencies, and any Federal Facilities Agreements when choosing a data validation strategy. Clearly define the proposed level of effort for data validation in the project work plan. Based on the data validation requirements identified in the project planning documents, the analytical data may undergo "Level B," "Level C," or "Level D" data validation or some combination of these validation levels.

Guidelines for the required level of effort for data validation is described below and further in Procedure II-A, *Data Validation*.

5.1.1 Amount of Raw Data Acquired

It is recommended to request and obtain from the laboratory all raw data generated for the project sample analyses. While not all of the raw data will likely be reviewed, it is more time-efficient and cost-effective to obtain the data at the time of analysis than to request the laboratory to provide them at a later date. In addition, project chemists and risk assessors may use portions of the raw data to more fully evaluate analytical data. Attachment I-A-7-1 presents the laboratory analytical data reporting requirements that shall be followed for the NAVFAC Pacific Area of Responsibility.

For projects with quick turnaround time (TAT) requirements, one option is to receive results only for the quick TAT, while receiving the remaining data at the normal TAT. This will allow the laboratory more time to compile the entire data package. Consult project-specific PQOs to determine if this approach is feasible.

5.1.2 Level B Validation

Level B validation is the least intensive of the three levels of data validation and is appropriate for non-critical data. Level B validation consists of evaluating factors such as holding times, spike analyses, blank analyses, and field QC samples. Examples of analytical results evaluated under data review include data generated during compliance monitoring, field analytical testing, or investigation derived waste sampling.

5.1.3 Level C Validation

Level C validation is the intermediary of the three levels of data validation and is appropriate for critical samples used in decision making. Level C validation consists of evaluating factors such as holding times, instrument calibration, spike and blank analyses, and field QC samples. Level C validation may be performed on a percentage or all of the project data. The exact percentage of data to undergo Level C validation will depend on the project objectives. Examples of analytical results evaluated under Level C validation include data generated for risk assessments, removal action verification, remedial designs, etc.

5.1.4 Level D Validation

Level D validation is the most rigorous of the three levels of data validation and is appropriate for critical samples used in decision making. Level D validation consists of evaluating factors such as holding times, instrument calibration, spike and blank analyses, field QC samples, and raw data. Level D validation may be performed on a percentage or all of the project data. The exact percentage of data to undergo Level D validation will depend on the project objectives. Examples of analytical results evaluated under Level D validation include data generated for risk assessments, removal action verification, remedial designs, etc.

Depending on the objectives of the project, a representative portion of data shall be chosen for Level D validation by selecting random samples and analyses, or more practically, be selected by identifying certain representative SDGs. This may include selecting all samples and analyses from one of the first SDGs of field samples for Level D data validation, and also for SDGs with different matrices, subsequent phases of work/mobilizations, and for each laboratory if more than one is used.

Larger projects typically require lower frequencies of Level D validation than smaller projects. For example, a project with one SDG may require 100 percent Level D validation. For a CTO with five SDGs, the first SDG may require Level D validation with the remaining four SDGs validated at Level C.

If significant issues, as defined in the data validation procedures presented in Section II of this procedures manual, are noted during Level D validation, additional Level D validation above the originally planned percentage may be warranted and should be proposed. Additionally, the first several SDGs validated should be evaluated and corrective actions taken immediately if issues are identified.

5.2 PLANNING AND COORDINATION

During the planning and cost estimating stage of a project, contact the data validation task leader. Discuss the level of quality control, data validation strategy, number of samples per method, number of SDGs, schedule, and due dates. Copy all planning documents to the data validation task leader when they are completed (draft and final).

Hardcopy data validation reports are typically required and electronic entry of data qualifiers and qualification codes may be required if an analytical database is used for data interpretation.

Continuing coordination is critical. Notify the data validation task leader of any changes to the sampling schedule, analytical plan, or number of samples. Inform the data validators as well as the laboratory of every change from the chain of custody/analytical request form in sample numbers and/or requested analyses. Communicate changes to analytical methods agreed upon with the laboratory to the data validation task leader.

A schedule, which is updated as needed, is necessary to track the status of data validation activities. The prime contractor QA Manager or Technical Director shall coordinate and set priorities between CTOs. Attachment I-A-7-2 is an example of a form that may be used by CTO personnel to track the data validation status of hardcopy data.

A cross-reference list of field QC samples associated with site samples is required to validate data. This list must be provided by field personnel or from the chain-of-custody logbook (Procedure III–E, *Record Keeping, Sample Labeling, and Chain-of-Custody*).

6. Records

Data validation reports generated by data validators shall include content discussed in Procedure II-A, *Data Validation* and be included as an appendix in the report and summarized in the report. Changes in the schedule, number of samples, or analytical plan shall be sent to the data validators verbally and in writing.

The data validation effort shall be summarized for inclusion as a section of the report. It may also be helpful to summarize the data validation results in the form of a data quality assessment report (DQAR). The DQAR should summarize the net results of data validation for each QC parameter evaluated. It is recommended that precision, accuracy, and percent completeness objectives also be presented in the report. This task could be conducted by the data validators, or by project staff more familiar with the PQOs. The content and format of the DQAR is discussed in Procedure II-S, *Data Quality Assessment Report*.

As part of the summary, the project personnel shall ensure that all data requested for analysis and validation were actually analyzed and validated. Identification of rejected data (and the reasons) may be the most critical results. Data that have been qualified from detections to nondetections, or data for which numerical values have changed significantly, are also important. The summary may focus on the analytes and samples that are considered most critical for each project and include a summary of field QC results by field QC type.

7. Health and Safety

Not applicable.

8. References

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Procedure II-A, *Data Validation*.

Procedure II-S, *Data Quality Assessment Report*.

Procedure III–E, *Record Keeping, Sample Labeling, and Chain-of-Custody.*

9. Attachments

Attachment I-A-7-1: DoD QSM Appendix DoD A Reporting Requirements

Attachment I-A-7-2: Example Hardcopy Data Validation Status Tracking Form

APPENDIX DOD-A – REPORTING REQUIREMENTS

In the absence of client specified reporting criteria, the reporting requirements outlined below shall be used for hard-copy data reports or electronic versions of hard-copy data (such as pdf). They include mandatory requirements for all printed data reports, and requirements for data reports requiring third party data review or validation. Optional reporting requirements are those that may be required by a specific project, depending upon their needs. The following elements are required: cover sheet, table of contents, case narrative, analytical results, sample management records, and Quality Assessment/Quality Control (QA/QC) information. Information for third-party review may be required depending on project-specific requirements or the method being used.

1.0 Cover Sheet

The cover sheet shall specify the following information:

- Title of report (i.e., test report, test certificate);
- Name and location of laboratory (to include a point of contact, phone and facsimile numbers, and e-mail address);
- Name and location of any subcontractor laboratories, and appropriate test method performed (information can also be located in the case narrative as an alternative);
- Unique identification of the report (such as serial number);
- Client name and address;
- Project name and site location;
- Statement of data authenticity and official signature and title of person authorizing report release;
- Amendments to previously released reports that clearly identify the serial number for the previous report and state the reason(s) for reissuance of the report; and
- Total number of pages.

2.0 Table of Contents

Laboratory data packages shall be organized in a format that allows for easy identification and retrieval of information. An index or table of contents shall be included for this purpose.

3.0 Case Narrative

A case narrative shall be included in each report. The purpose of the case narrative is to:

- Describe any abnormalities and deviations that may affect the analytical results;
- Summarize any issues in the data package that need to be highlighted for the data user to help them assess the usability of the data; and
- Provide a summary of samples included in the report with the methods employed in order to assist the user in interpretation.

The case narrative shall provide (Information need not be repeated if noted elsewhere in the data package):

- A table(s) summarizing samples received, providing a correlation between field sample numbers and laboratory sample numbers, and identifying which analytical, preparation, and clean-up methods were performed. If multiple laboratories performed analyses, the name and location of each laboratory **shall** be associated with each sample;
- A list of samples that were received but not analyzed;
- Date of samples received;
- Sample preservation or condition at receipt;
- A description of extractions or analyses that are performed out of holding times;
- A definition of all data qualifiers or flags used;
- Identification of deviations of any calibration standards or QC sample results from appropriate acceptance limits and a discussion of the associated corrective actions taken by the laboratory;
- Identification of multiple sample runs with reason(s) identified (e.g., dilutions or multiple cleanups);
- Identification of samples and analytes for which manual integration was necessary; and
- Appropriate notation of any other factors that could affect the sample results (e.g., air bubbles in volatile organic compounds (VOC) sample vials, excess headspace in soil VOC containers, the presence of multiple phases, sample temperature or pH excursions, and container type or volume).

4.0 Analytical Results

The results for each sample shall contain the following information at a minimum: (Information need not be repeated if noted elsewhere in the data package):

- Project name and site location;
- Field sample ID number as written on custody form;
- Laboratory sample ID number;
- Preparation batch number(s);
- Matrix (soil, water, oil, air, etc.);
- Date and time sample collected;
- Date and time sample prepared;
- Date and time sample analyzed;
- Method numbers for all preparation, cleanup, and analysis procedures employed;
- Analyte or parameter with the Chemical Abstracts Service (CAS) Registry Number if available;

- Sample aliquot analyzed;
- Final extract volume;
- Identification of analytes in which manual integration occurred, including the cause and justification;
- Analytical results with correct number of significant figures;
- Detection Limit, Limit of Detection, and Limit of Quantitation associated with sample results and adjusted for sample-specific factors (e.g., aliquot size, dilution/concentration factors, and moisture content);
- Any data qualifiers assigned;
- Concentration units;
- Dilution factors;
- All multiple sample run results shall be reported;
- Percent moisture or percent solids (all soils are to be reported on a dry weight basis); and
- Statements of the estimated uncertainty of test results (optional).

5.0 Sample Management Records

Sample Management records shall include the documentation accompanying the samples, such as:

- Chain-of-custody records;
- Shipping documents;
- Records generated by the laboratory which detail the condition of the samples upon receipt at the laboratory (e.g., sample cooler receipt forms, cooler temperature, and sample pH);
- Telephone conversation or e-mail records associated with actions taken or quality issues; and
- Records of sample compositing done by the laboratory.

6.0 QA/QC Information

The minimum laboratory internal QC data package shall include:

- Method blank results;
- Percent recoveries for Laboratory Control Sample (LCS), Laboratory Control Sample Duplicates (LCSD), Matrix spike (MS), and Matrix Spike Duplicates (MSD);
- MSD or matrix duplicate Relative percent differences (RPD);
- Surrogate percent recoveries;
- Tracer recoveries;
- Spike concentrations for LCS, MS, surrogates;
- QC acceptance criteria for LCS, MS, surrogates;
- Post-Digestion Spike (PDS) recoveries;

- In-house or project specified LCS control limits, as applicable;
- Serial dilutions (SD) percent difference; and
- Batch numbers (preparation, analysis, and cleanup).

7.0 Data Reports for Third Party Review or Validation

When third party review or data validation is to be performed, the extent (stage) of data validation that can be performed is dependent upon the type (level) of data report delivered by the laboratory. The data report level and data validation stage required to meet project data quality objectives should be specifically defined in the QAPP.

The minimum reporting requirements for each level of data report are outlined below.

- A cover sheet, table of contents, and case narrative including all of the information specified in the above sections are required for all levels of data reports.
- **Level 1**: Analytical results, Sample Management Records.
- **Level 2**: **Level 1** reporting requirements plus QA/QC Information, Instrument QA/QC Information, Instrument and Preparation logs.
- **Level 3**: **Level 2** reporting requirements plus Instrument Quantitation Reports.
- **Level 4**: **Level 3** reporting requirements plus Instrument Chromatograms and Spectra.
- In addition, Standards traceability should be included in Levels 3 and 4 if a legal chain of custody is required.

The data validation guidelines established in other Department of Defense guidance or project-specific guidelines may have distinct reporting formats. The appropriate QAPP should be consulted to determine what type of data package is required.

Sample Naming

1. Purpose

This standard operating procedure describes the naming convention for samples collected and analyzed, and whose resulting data will be stored in the database for the United States Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific projects. Unique sample names are used to facilitate tracking by laboratory personnel and project personnel, and for purposes of storing, sorting, and querying data in the database.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

3.1 Chain of Custody Sample Number

The chain of custody (COC) sample number is a five-character identification number that is used by the laboratory and project personnel for tracking purposes. A unique COC sample number must be used for each sample collected from a particular location at a particular time. It is useful for the first two characters to be letters unique to a particular site or project, while the remaining three characters may be digits from 001 to 999 (e.g., AA001). The COC sample number is the only identifier that should be presented to the laboratory.

3.2 Sample Identification Number

The sample identification number is a unique multi-alpha, multi-numeric identifier that is used by the field team to associate sampling results to the particular sampling location, sample type, number of times the location has been sampled, and depth. To avoid potential bias in sample analysis, the sample identifier is not provided to the laboratory. The sample identification number shall be recorded in the field logbook concurrently with the COC sample number.

4. Responsibilities

The prime contractor CTO Manager shall ensure that a proper sample naming convention is identified in the field sampling plan. The Field Quality Control (QC) Supervisor or other field-sampling leader shall ensure that the sample naming convention is implemented. The laboratory coordinator, CTO Manager, and/or other designated personnel shall ensure on a daily basis that unique, appropriate COC sample numbers and sample identifiers have been assigned. The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The prime contractor Technical Director will designate one person in each office (e.g., the laboratory coordinator) to track site designations used in the COC sample number.

5. Procedures

A COC sample number and sample identifier shall be assigned as described below. It is critical that each sample name have a unique COC sample number and sample identifier; otherwise, data cannot be properly stored and tracked in the database.

5.1 COC Sample Number

Use the following format for the COC sample number:

abccc

Where:

a = A letter indicating the office managing the CTO

b = A letter indicating the project or site, for example

A = first site

B = second site

C = third site, etc.

ccc = Chronological number, for example

001 = first sample from the site

002 = second sample from the site

105 = 105th sample from the site

Field QC samples should be included in this chronological sequence

For example, the 23rd sample from the Carpentry Shop Dip Tank site (assigned project "A" for b above; the office will be assigned "D") being investigated would be referred to as "DA023." This might be a soil sample, water sample, trip blank, equipment blank, field duplicate, or other sample type. Using this COC sample number, the samples will be submitted to the laboratory "blind," that is, the laboratory should not know whether each sample received is a site or field QC sample.

If a sample is lost during shipping, the replacement sample must be assigned a new COC sample number. If different containers for the same sample are shipped on different days, a new COC sample number must be assigned.

When numbering reaches the letter Z, the 26th site, it may begin with a new first letter "a," which must be coordinated with the prime contractor QA Manager or Technical Director and Coordinator or designee to ensure that it has not been used by another CTO.

Alternatively, the "ab" designators can serve to identify a unique project field, such as "RH" for the Red Hill site.

5.2 SAMPLE IDENTIFICATION NUMBER

The following format is provided as a suggested guidance. Individual site objectives may necessitate variations to the suggested guidance. Coordinate with the prime contractor QA Manager or Technical Director when considering deviating from this guidance.

AA-bbcc-dee-Dff.f

Where:

AA = Designates the site identification

bb = Sample type and matrix (see Table I-A-8-1)

cc = Location number (e.g., 01, 02, 03)

d = Field QC sample type (see Table I-A-8-2)

ee = Chronological sample number from a particular sampling location (e.g., 01, 02, 03)

D = The letter "D" denoting depth

ff.f = Depth of sample in feet bgs (to the measured decimal place). For field blanks, trip blanks and equipment blanks, the depth field will contain the month and date of collection.

For example, the first subsurface soil sample collected from the Foundry Building (FB) borehole location four at a depth of 10 feet would be designated "FB-BS04-S01-D10.0." These characters will establish a unique sample identifier that can be used when evaluating data.

Table I-A-8-1 presents the character identifiers to be used in the sample and matrix portion of the sample identification number. In all cases, the second letter indicates the sample matrix. Note grab, composite, and undisturbed sample designations in the field logbook.

Table I-A-8-1: Sample Type and Matrix Identifiers

Identifier	Sample Type	Matrix
SS	Surface Soil	Soil
IS	Surface Soil (ISM)	Soil
IB	Subsurface Soil (ISM)	Soil
BS	Subsurface Soil	Soil
BG	Subsurface Soil (Geotechnical)	Soil
SD	Sediment	Sediment
GW	Groundwater	Water
SW	Surface Water	Water
FP	Free Product	Oil
WQ	Water Blanks	Water
SG	Soil Gas	Soil gas
CC	Concrete Chips	Concrete

Identifier	Sample Type	Matrix
WS	Waste (IDW)	Soil
WW	Waste (IDW)	Water

IDW investigation-derived waste
ISM incremental sampling methodology

Table I-A-8-2 describes the field QC designator types. These field QC designators clarify the type of sample collected.

Table I-A-8-2: Field QC Sample Type Identifiers

Identifier	QC Sample Type	Description
S	Normal (Primary) Sample	All non-field QC samples
D	Duplicate	Collocate (adjacent liners)
R	Triplicate	Replicate
E	Equipment Rinsate	Water
B	Field Blank	Water
T	Trip Blank	Analytical-laboratory-prepared sample -Water
M	Trip Blank	Analytical-laboratory-prepared sample – Methanol
L	Batch Test Sample	Batch Test Leaching Model Sample
P	Blind Spike	Performance testing sample

6. Records

Sample identifiers (and COC sample numbers, if appropriate) shall be identified in advance if the exact numbers of samples to be collected are known; these numbers may be listed on a spreadsheet along with requested analyses to be used as a reference by field sampling personnel.

The COC/analytical request form must be used to track all sample names. Copies of each COC form shall be sent daily to the CTO Laboratory Coordinator and with the samples to the analytical laboratory. An example of a COC form is included as Attachment III-E-2 of Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody*.

In the field, personnel shall record in the field logbook the COC sample number of each sample collected, as well as additional information, such as the sampling, date, time, and pertinent comments.

7. Health and Safety

Not applicable.

8. References

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody*.

9. Attachments

None.

Soil Sampling

1. Purpose

This section sets forth the standard operating procedure for soil sampling (surface samples, trench samples, and boring samples) to be used by United States (U.S.) Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific personnel.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the most recent version of the Uniform Federal Policy-Quality Assurance Project Plan (UFP QAPP) Part 1 (DoD 2005a), 2A (DoD 2012), and 2B (2005b), as well as the DoD Quality Systems Manual (DoD 2013). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

None.

4. Responsibilities

The prime contractor CTO Manager is responsible for ensuring that these standard soil sampling procedures are followed during projects conducted under the NAVFAC Pacific ER Program, and that they are conducted or supervised by a qualified individual. A qualified individual for subsurface sampling is defined as a person with a degree in geology, hydrogeology, or geotechnical/civil engineering with at least 1 year of experience in the supervision of soil boring construction. A qualified individual for trenching, excavation (e.g., pit), or surface sampling supervision is one who has sufficient training and experience to accomplish the objectives of the sampling program. The CTO Manager shall also ensure that a qualified person, as defined in Procedure I-E, *Soil and Rock Classification,* conducts soil classification during all types of soil sampling. The CTO Manager is responsible for ensuring that all personnel involved in sampling and/or testing shall have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager is responsible for ensuring that all project field staff follow these procedures.

Field sampling personnel are responsible for the implementation of this procedure.

5. Procedures

5.1 CONSIDERATIONS FOR MUNITIONS AND EXPLOSIVES OF CONCERN

Potential Munitions and Explosives of Concern (MEC) hazards may be encountered in any area formerly or currently occupied or used by the Department of Defense (DoD). MEC hazards may occur on the ground surface, in the subsurface, and within bodies of water, and may not always be readily observable, or identifiable. As a result, whether or not munitions-related activities ever occurred on the specific work area or within waters in which Navy operations/activities will take place, special care should always be taken when conducting field operations, especially intrusive activities, in the event that MEC may be encountered.

If the site is currently recognized as belonging in the Military Munitions Response Program and has a current, Naval Ordnance Safety and Security-accepted, site-specific Explosives Safety Submission (ESS) (per DON 2010), then field activities, especially intrusive activities, shall adhere to the safety procedures outlined within the ESS.

If suspected MEC is encountered on an active DoD installation, immediately notify your supervisor, DoD Point of Contact, and installation Point of Contact, who will contact and facilitate military Explosive Ordnance Disposal response.

5.2 SUBSURFACE SOIL SAMPLING

The purpose of subsurface soil sampling is to acquire accurate, representative information about subsurface materials penetrated during drilling or trenching. This is accomplished by logging lithologic information, classifying lithologic materials, and collecting lithologic samples for analysis using geotechnical or chemical methods.

5.2.1 Inspection of Equipment

The collection of reliable samples of subsurface materials depends partly on the types of samples that can be collected when using various subsurface exploration techniques. These procedures are described in Section 5.2. In all cases, the equipment shall be inspected prior to commencement of drilling for signs of fluid leakage, which could introduce contaminants into the soil. If, at any time during subsurface exploration, fluid is observed leaking from the rig, operations shall cease and the leak shall be immediately repaired or contained. All soil and other materials affected by the leak will be collected, containerized, and labeled for proper disposal (Procedure I-A-6, *Investigation-Derived Waste Management*).

5.2.2 Preparation of Site

Proper preparation of the site prior to the commencement of subsurface exploration is essential for smooth drilling operations. It is required to protect the health and safety of site personnel. First, the site shall be inspected to ensure that there are no overhead hazards that could affect subsurface exploration. Then, all subsurface sampling locations shall be assessed using geophysical methods to identify subsurface utilities or hazards. If possible, the area shall be excavated by hand to a depth of 2 to 3 feet before beginning drilling. If surface or shallow samples are required, it is suggested that the hand excavation be done as close to the actual subsurface exploration as possible. The drill rig must have a means to guard against employee contact with the auger (e.g., guard around the auger; barricade around the perimeter of the auger; electronic brake activated by a presence-sensing device). All members of the field crew shall know the location of the kill switch, which must be readily accessible, for the equipment.

The equipment shall be situated upwind or side-wind of the borehole. The area surrounding, and in the vicinity of, the borehole shall be covered with plastic, including the area where cuttings are placed into 55-gallon drums and the equipment decontamination area. The required exclusion zones shall be established by using plastic tape or cones to designate the various areas.

5.2.3 Equipment Decontamination

To avoid cross-contamination, all sampling equipment utilized for borehole drilling and soil sampling that may potentially come into contact with environmental samples shall be thoroughly decontaminated as described in Procedure I-F, *Equipment Decontamination*. All sampling tools shall be decontaminated between each sampling event and between each borehole or trench. At a minimum, all equipment shall be steam-cleaned or undergo the wash-and-rinse process. All wash-and-rinse water shall be collected, containerized, and labeled for proper disposal. Clean equipment (e.g., augers and samplers) shall be protected from contact with contaminated soils or other contaminated materials prior to sample collection. Equipment shall be kept on plastic or protected in another suitable fashion. After a borehole is completed, all augers and contaminated downhole equipment shall be stored on plastic sheeting.

5.2.4 Handling of Drill Cuttings

All soil cuttings from borehole drilling shall be placed into 55-gallon U.S. Department of Transportation (DOT)-approved drums or other appropriate containers, such as a roll-off bin. The containerized cuttings shall be stored in a centralized area pending sample analysis to determine their final disposition. The procedure on investigation-derived waste (IDW) (see Procedure I-A-6, *Investigation-Derived Waste Management*) details drum handling and labeling procedures.

5.3 SUBSURFACE SOIL SAMPLE COLLECTION METHODS

Table I-B-1-1 describes the characteristics of the sampling methods for the drilling techniques frequently used for soil borings and monitoring well installation, as described in Procedure I-C-1, *Monitoring Well Installation and Abandonment*. The split-spoon sampling method is the most commonly used soil sampling technique. However, in certain circumstances, other methods may have to be used to obtain optimal soil sampling results.

Sampling and handling procedures for samples submitted for volatile organic compound (VOC) analyses are provided in Attachment I-B-1-1. Considerations when using incremental sampling (IS) methods are provided in Attachment I-B-1-1.

Table I-B-1-1: Characteristics of Common Subsurface Formation-Sampling Methods

Type of Formation	Sample Collection Method	Sample Quality	Potential for Continuous Sample Collection?	Samples Suitable for Analytical Testing?	Discrete Zones Identifiable?
Unconsolidated	Bulk Sampling (Cuttings)	Poor	No	No	No
	Thin Wall	Good	Yes	Yes	Yes
	Split Spoon	Good	Yes	Yes	Yes
	Trench	Good	No	Yes	Yes
	Core Barrels	Good	Yes	Yes	Yes
Consolidated	Cuttings (direct rotary)	Poor	No	No	No
	Core Barrels	Good	Yes	Yes	Yes

The following text describes the primary soil sampling methods used for the NAVFAC Pacific ER Program.

5.3.1 Split-Spoon Samples

Split-spoon sampling is usually used in conjunction with the hollow-stem or solid-stem auger drilling method and can be used for sampling most unconsolidated and semi-consolidated sediments. It is used less frequently for air and mud rotary, and casing drive methods. It cannot normally be used to sample bedrock, such as basalt, limestone, or granite. The method can be used for highly unconsolidated sands and gravels if a stainless-steel sand catcher is placed in the lower end of the sampler.

The split-spoon sampler consists of a hardened metal barrel, 2 to 3 inches in diameter (2 to 2.5 inches inner diameter) with a threaded, removable fitting on the top end for connection to the drill rods and a threaded, removable "shoe" on the lower end that is used to penetrate the formation. The barrel can be split along its length to allow removal of the sample.

The following steps are required to obtain a representative soil sample using a split-spoon sampler:

- Advance the borehole by augering until the top of the desired sampling interval is reached. Then withdraw the drill bit from the hollow-stem augers.
- Equip the sampler with interior liners that are composed of materials compatible with the suspected contaminants if samples are to be retained for laboratory analytical analysis. Generally, these liners consist of brass or stainless steel and are slightly smaller than the inner diameter of the sampler. It is recommended to use stainless-steel liners rather than

brass if samples are to be analyzed for metals. Always evaluate the composition of the liners with respect to the types of contaminants that are suspected.

- Attach the properly decontaminated split-spoon sampler (equipped with liners) either to the drill rods or to a cable system and lower it to the bottom of the borehole through the augers.
- Drive the sampler into the formation by either a manual or automatic hammer (usually a 140-pound weight dropped through a 30-inch interval). Record the number of blows required to drive the sampler at 6-inch intervals in the boring log since blow counts provide an indication of the density/compaction of the soils being sampled. The field geologist, hydrogeologist, or geotechnical engineer shall carefully observe the internal measuring technique of the driller and keep track of sampling materials to ensure the accurate location of samples. Continuous samples can be collected with the split-spoon method by augering or drilling to the bottom of the previously sampled interval and repeating the operation. Whether continuous or intermittent, this collection method disturbs samples and cannot be used for certain geotechnical tests that require undisturbed samples.
- Bring the split-spoon sampler to ground surface and remove it from the drill rods or cable system following sample acquisition. Loosen the upper and lower fittings and take the sampler to the sample handling area. At the sample handling area, remove the fittings, split the barrel of the sampler, and remove one side of the sampler. At this time, it is important to observe and record the percentage of sample recovery.

Liners—Sampler liners can be used to collect and store samples for shipment to laboratories, for field index testing of samples, and for removing samples from solid barrel type samplers. Liners are available in plastic, Teflon, brass, and stainless steel. Other materials can be used as testing needs dictate. Liners are available in lengths from 6 inches (152.4 millimeters) to 5.0 feet (1.53 meters). Liner material selection often is based on the chemical composition of liner/soil to minimize sample reaction with liner. Most liner use is short-term as samples are subsampled and preserved immediately on site. Teflon may be required for mixed wastes and for long-term storage. Liners generally are split in the field for subsampling. Individually split liners are available in some sizes for field use. The liner should have a slightly larger inside diameter than the soil specimen to reduce soil friction and enhance recovery. When a slightly oversized liner is used, the potential for air space exists around the sample. Certain chemical samples may be affected by the enclosed air. Liners with less tolerance may be required and a shortened sample interval used to reduce friction in the liner. Metal liners can be reused after proper cleaning and decontamination. Plastic liners should be disposed of properly after use (ASTM 2005).

Immediately remove the liners containing the soil samples from the sampler. Generally, the lowermost liner is considered the least disturbed and shall be retained as the analytical laboratory sample. However, in certain circumstances (such as with the use of a sand catcher), other liners may be more appropriate for retention as the laboratory sample. If liners containing the sample material are to be submitted to the laboratory, then cover the ends of the sample liner to be retained as the analytical laboratory sample with Teflon film and sealed with plastic caps. While currently not preferred by the State of Hawaii, if liners are submitted, the laboratories should be instructed to prepare the soil from the liner as an incremental sample to prevent biasing the results that can occur when discretely collecting the analytical volume. The site geologist, hydrogeologist, or geotechnical engineer shall observe the ends of the liner destined for analytical sampling and describe the physical nature of the sample (e.g., soil or rock type, grain size, color, moisture, as indicated in Procedure I-E, *Soil and Rock Classification*.) Then label the sample according to Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody*, and immediately place it on ice in a cooler as described in Procedure III-F, *Sample Handling, Storage, and Shipping*.

- Collect split-spoon soil samples submitted for VOC analysis using the procedure found in Attachment I-B-1-1.
- Collect split-spoon soil samples submitted for non-VOC analysis using the IS procedure found in Attachment I-B-1-1
- Any remaining liners collected from the sample can then be used for other purposes, such as providing a duplicate sample for field quality control or material for lithologic logging. These samples can also be used for headspace analysis as described in Section 5.4.
- Conduct lithologic logging of each sample in accordance with Procedure I-E, *Soil and Rock Classification*, and enter each sample into the boring log presented in Figure I-B-1-1. In most instances, an additional liner full of material is available for this purpose. Check to ensure that all liners contain similar material. If an extra liner full of material is not available, then log by collecting the extra material present in the end of the sampler shoe. Make a comparison to the material visible at the end of the sample liner destined for laboratory analysis to ensure that the entire sample consists of similar material. If not, then describe the different material to the extent possible by relating it to similar material that was encountered previously.
- If VOCs are suspected to be present, screen the sample with an organic vapor monitor (OVM) or equivalent, and collect headspace samples according to Section 5.4.
- Decontaminate all sampling equipment prior to each use according to Procedure I-F, *Equipment Decontamination*.

5.3.2 Thin-Wall Samples

The thin-wall or Shelby tube sampler is usually used in conjunction with the hollow-stem and solid-stem auger drilling methods and is most useful when sampling clay- and silt-rich sediments. It can also be used with air and mud rotary and casing drive drilling techniques. It is amenable only to lithologies that are relatively soft and, in some cases, is not capable of penetrating hard clays or compacted sands. In addition, samples of unconsolidated sands cannot normally be acquired because they cannot be retained within the sampler, although a sand catcher can be utilized, in some cases, with moderate success.

The thin-wall sampler often consists of a single thin tube that is 3 to 4 inches in outer diameter and 1 to 3 feet in length. The upper end of the sampler has a solid metal section with a fitting for drill rods. There is no fitting for the lower end of the sampler, and it is usually open to allow sample acquisition; however, when sampling in poorly consolidated materials, a sand catcher may be placed in the lower end to ensure retention of the sample.

The following steps are required to obtain a representative soil sample using a thin-wall sampler:

- Advance the borehole by augering or drilling until the top of the desired sampling interval is reached. Then withdraw the drill bit from the hollow-stem augers.
- Place the sampler on the end of the drill rods and lower it to the bottom of the borehole.
- Instead of driving the sampler, use the hydraulic apparatus associated with the kelly bar on the drilling rig to press the sampler into the undisturbed formation. The thin-wall sampler may lack sufficient structural strength to penetrate the materials, in which case another sampling technique may be required. The samples obtained using this method cannot be used for certain geotechnical tests where undisturbed samples are required.
- Thin-wall samples submitted for VOC analysis must be collected using the procedure found in Attachment I-B-1-1.
- Following sample acquisition, bring the thin-wall sampler to the ground surface, remove it from the drill rods, and take it to the sample handling area.
- Immediately cover the ends of the sample with Teflon film and sealed with plastic caps if the sample is to be retained as a laboratory sample. Then label the sample according to Procedure III-E*, Record Keeping Sample Labeling, and Chain of Custody* and immediately place it on ice in a cooler. Extrude the sample from the sampler and inspect it if the sample is to be used only for lithologic logging.
- Conduct lithologic logging of each sample in accordance with Procedure I-E*, Soil and Rock Classification* and enter each sample into the boring log presented in Figure I-B-1-1. If the sample is contained in a sleeve, observe the ends of the sample in the sleeve to assess lithologic and stratigraphic characteristics.
- If VOCs are suspected to be present, screen the sample with an OVM or equivalent, and collect headspace samples according to Section 5.4.
- Decontaminate all sampling equipment prior to each use according to Procedure I-F, *Equipment Decontamination.*

5.3.3 Cores

A core barrel is often used to obtain core samples from harder lithologic materials, such as basalt, granite, and limestone, in instances where undisturbed samples are required for geotechnical testing, and in cases where completely continuous sampling is required. Complete recovery of samples during coring is often difficult when sampling unconsolidated and semi-consolidated lithologies, such as clays, silts, and sands.

Field Log of Boring

BORING NUMBER			SHEET ____ OF _____

PROJECT NAME	PROJECT NUMBER	ELEVATION AND DATUM	LOCATION
DRILLING COMPANY	DRILLER	DATE AND TIME STARTED	DATE AND TIME COMPLETED
DRILLING EQUIPMENT	DRILLING METHOD	COMPLETION DEPTH	TOTAL NO. OF SAMPLES
SIZE AND TYPE OF BIT	HOLE DIAMETER	NO. OF SAMPLES / BULK / SS	DRIVE / PITCHER
DRILLING FLUID	DRILLING ANGLE	WATER LEVEL / FIRST	AFTER _______ HOURS
SAMPLE HAMMER TYPE / DRIVING WT. / DROP		HYDROGEOLOGIST/DATE	CHECKED BY/DATE

LITHOLOGY	DEPTH (FEET)	SAMPLES	RECOVERY	BLOW COUNT	DESCRIPTION	USCS SYMBOL	ESTIMATED PERCENT OF GR	ESTIMATED PERCENT OF SA	ESTIMATED PERCENT OF FI	COMMENTS

Figure I-B-1-1: Field Log of Boring

ASTM International (ASTM) has standardized rock coring methods (D-2113) (ASTM 2006). Several standardized core sizes for bits, shells, and casings have been established (e.g., RX, NX, SW). Table I-B-1-2 summarizes the various size standards for core barrels and bits.

Table I-B-1-2: Standard Core Barrel Sizes (in inches)

Description	RX or RW	EX or EW	AX or AW	BX or BW	NX or NW	HX or HW	PX or PW	SX or SW	UX or UW	ZX or ZW
Bit Set Normal I.D.	0.750	0.845	1.185	1.655	2.155	3.000	—	—	—	—
Bit Set Normal and Thin-wall O.D.	1.160	1.470	1.875	2.345	2.965	3.890	—	—	—	—
Bit Set Thin-wall. I.D	0.735	0.905	1.281	1.750	2.313	3.187	—	—	—	—
Shell Set Normal and Thin-wall O.D.	1.175	1.485	1.890	2.360	2.980	3.907	—	—	—	—
Casing Bit Set I.D.	1.000	1.405	1.780	2.215	2.840	3.777	4.632	5.632	6.755	7.755
Casing Bit Set and Shoe O.D.	1.485	1.875	2.345	2.965	3.615	4.625	5.650	6.780	7.800	8.810

I.D. Inner Diameter
O.D. Outer Diameter

The selection of the most practical core barrel for the anticipated bedrock conditions is important. The selection of the correct drill bit is also essential to good recovery and drilling production. Although the final responsibility of bit selection usually rests with the drilling contractor, there is a tendency in the trade to use "whatever happens to be at hand." The selection of the diamond size, bit crown contour, and number of water ports depends upon the characteristics of the rock mass. The use of an incorrect bit can be detrimental to the overall core recovery. Generally, fewer and larger diamonds are used to core soft formations, and more numerous, smaller diamonds, which are mounted on the more commonly used semi-round bit crowns, are used in hard formations. Special impregnated diamond core bits have been developed recently for use in severely weathered and fractured formations where bit abrasion can be very high.

Core barrels are manufactured in three basic types: single tube, double tube, and triple tube. These basic units all operate on the same principle of pumping drilling fluid through the drill rods and core barrel. This is done to cool the diamond bit during drilling and to carry the borehole cuttings to the surface. A variety of coring bits, core retainers, and liners are used in various combinations to maximize the recovery and penetration rate of the selected core barrel.

The simplest type of rotary core barrel is the single tube, which consists of a case hardened, hollow steel tube with a diamond drilling bit attached at the bottom. The diamond bit cuts an annular groove, or kerf, in the formation to allow passage of the drilling fluid and cuttings up the outside of the core barrel. The single tube core barrel cannot be employed in formations that are subject to erosion, slaking, or excessive swelling, as the drilling fluid passes over the recovered sample during drilling.

The most popular and widely used rotary core barrel is the double tube, which is basically a single tube barrel with a separate and additional inner liner that is available in either a rigid or swivel type of construction. In the rigid types, the inner liner is fixed to the outer core barrel so that it rotates with the outer tube. In contrast, the swivel type of inner liner is supported on a ball-bearing carrier, which allows the inner tube to remain stationary, or nearly so, during rotation of the outer barrel. The sample, or core, is cut by rotation of the diamond bit. The bit is in constant contact with the drilling fluid as it flushes out the borehole cuttings. The addition of bottom discharge bits and fluid control valves to the core barrel system minimizes the amount of drilling fluid and its contact with the sample, which further decreases sample disturbance.

The third and most recent advancement in rotary core barrel design is the triple tube core barrel, which adds another separate, non-rotating liner to the double tube core barrel. This liner, which retains the sample, consists of a clear plastic solid tube or a split, thin metal liner. Each type of liner has its distinct advantages and disadvantages; however, they are both capable of obtaining increased sample recovery in poor quality rock or semi-cemented soils, with the additional advantage of minimizing sample handling and disturbance during removal from the core barrel.

The rotary core barrels that are available range from 1 to 10 inches in diameter, and the majority may be used with water, drilling mud, or air for recovering soil samples. Of the three basic types of core barrels, the double tube core barrel is most frequently used in rock core sampling for geotechnical engineering applications. The triple tube core barrel is used in zones of highly variable hardness and consistency. The single tube is rarely used because of its sample recovery and disturbance problems.

Coring to obtain analytical samples requires only filtered air as the drilling fluid. The core barrel operates by rotating the outer barrel to allow the bit to penetrate the formation. The sample is retained in the inner liner, which in most samplers does not rotate with the outer barrel. As the outer barrel is advanced, the sample rises in the inner liner. In general, a secondary liner consisting of plastic or metal is present within the inner liner to ensure the integrity of acquired samples.

Obtain soil or rock core samples with a core barrel or a 5-foot split-spoon core barrel using the following procedure:

- Drill the core barrel to the appropriate sampling depth. It is important to use only clean, filtered air (i.e., particulate- and petroleum-free) as drilling fluid while coring to obtain samples for laboratory analysis. If necessary, distilled water may be added through the delivery system of the coring device by the driller, provided that the drilling returns cannot be brought to the surface by air alone.
- Retrieve the core barrel from the hole. Use care to ensure that the contents of the core barrel do not fall out of the bottom during withdrawal and handling.
- Open the core barrel by removing both the top and bottom fittings. Then remove the sample within the inner liner from the core barrel and take it to the sample handling area.

- Conduct lithologic logging of each sample in accordance with Procedure I-E, *Soil and Rock Classification*, and enter each sample into the boring log presented in Figure I-B-1-1.
- If VOCs are suspected to be present, screen the sample with an OVM or equivalent, and collect headspace samples according to Section 5.4.

Collect core samples submitted for VOC analysis using the procedure found in Attachment I-B-1-1.

- If rock core samples are to be recovered for analytical laboratory or geotechnical analyses, the core barrel will either be lined with a sample container (e.g. stainless steel or acrylic liner), or the samples will be transferred to an appropriate sample container (e.g. stainless steel / acrylic liner, glass jar). Samples collected or placed in stainless steel or acrylic liners shall have the ends of the liners covered with Teflon film and sealed with plastic end caps. The sample containers shall be labeled in accordance with Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody*, and Procedure III-F, *Sample Handling, Storage, and Shipping*, and immediately placed on ice in a cooler.
- Place the samples in core boxes if samples are to be catalogued and stored. Affix the CTO number; site name; borehole number; start depth; end depth; date; and name of the geologist, hydrogeologist, or geotechnical engineer to the core box. Store the samples in a clean, dry area on site during the duration of field sampling; samples shall not be brought back to the office or equipment storage area. Document proper disposal at the completion of field sampling.
- Decontaminate all sampling equipment prior to each use according to Procedure I-F, *Equipment Decontamination*.

5.3.4 Bulk Samples

The term “bulk sample” represents a sample collected from borehole cuttings either from the hollow-stem auger flights or the discharge of any of the rotary or cable tool drilling techniques. This type of sample is useful for describing soils or consolidated materials, where no undisturbed samples representative of a specific depth are being collected. It should be noted that this type of sample is generally considered to be the least acceptable of the types of samples previously described in this section and shall be used only when detailed lithologic data are not needed.

Handling and lithologic logging of bulk samples should be performed in a manner consistent with that used for split-spoon samples. An estimate of the depth (or range of depths) from which the sample was obtained, and date and time of collection should be recorded on the boring log. Samples are usually collected every 5 feet, preferably at several different times during a 5-foot drilling run so that lithologic variations occurring over the drilling interval can be noted. Rock fragments commonly range in size from 1/16 to 1/2 inch, with many fragments larger than 1/4 inch. Larger fragments can often be obtained with reverse circulation rotary drilling. Rotary-tool samples usually contain some caved materials from above and, when drilling with mud or water rotary, the cuttings may contain soil and rock recirculated by the mud/water pump; therefore, care must be exercised when interpreting lithologic logs completed using data from this type of sample.

Because the collection of samples at the surface lags behind the actual drilling of a given lithologic bed at depth, the samples usually represent a depth less than that of the current depth of the drill bit. The amount of lag may be significant in deeper boreholes, but can be eliminated by collecting samples after circulating for a period of time sufficient to permit the most recently drilled materials to reach the surface.

5.3.5 Borehole Abandonment

Following completion of soil sampling, the borehole shall be properly abandoned unless a monitoring well is to be installed. Abandonment shall occur immediately following acquisition of the final sample in the boring and shall consist of the placement of a bentonite-cement grout from the bottom of the boring to within 2 feet of ground surface. The grout mixture shall consist of a mix of 7 to 9 gallons of water per 94-pound bag of Portland Type I or II cement with 3 to 5 percent by weight of powdered bentonite. Other commercial products such as Volclay are also acceptable with approval of the CTO Manager and QA Manager or Technical Director. The bentonite-cement grout shall be placed in one continuous pour from the bottom of the boring to within at least 0.5 foot to 2 feet of ground surface through a tremie pipe or hollow-stem augers. Additional grout may need to be placed if significant settlement occurs. The remaining portion of the boring can be filled with topsoil.

5.3.6 Trenching and Pit Sampling

Trenching is used in situations where the depth of investigation generally does not exceed 10 to 15 feet and is most suitable for assessing surface and near-surface contamination and geologic characteristics. In addition, trenching allows detailed observation of shallow subsurface features and exposes a wider area of the subsurface than is exposed in borings. Pit sampling is typically conducted in conjunction with a removal or remedial action.

A backhoe is usually used to excavate shallow trenches to a depth of no greater than 15 feet. Front-end loaders or bulldozers are used when it is not possible to use a backhoe; for example, when materials lack cohesion or are too stiff, or the terrain is too steep for a backhoe. Larger excavations (i.e., pits) may require additional equipment as described in the CTO work plan (WP) or equivalent document.

Typically, trenches have widths of one to two backhoe buckets and range in length from 5 to 20 feet, although larger trenches can be dug depending on the objectives of the study. Pits will vary in size depending upon the scope of the removal/remedial action. Soils removed from the trench/pit shall be carefully placed on plastic sheeting or other appropriate materials in the order of removal from the trench or excavation. The shallow excavated materials can be placed on one side of the trench/excavation and deeper materials on the other side to allow better segregation of shallow and deep materials.

Soil sampling locations within each trench or pit shall be chosen on the basis of visual inspection and any VOC screening results. Samples shall be collected from either the sidewalls or the bottom of the trenches/excavations. Soil sampling should be conducted outside the trench/excavation, and personnel generally should not enter a trench or pit if there is any other means (e.g., backhoe buckets, hand augers, shovels, or equivalent) to perform the work. If entry is unavoidable, then a competent person shall first determine acceptable entry conditions including sloping, shoring, and air monitoring requirements, personal protective equipment (PPE), and inspections. In addition, the site-specific health and safety plan must be amended to include applicable requirements of 29 Code of Federal Regulations (CFR) 1910.146.

Equipment used for trench/pit sampling may include hand augers, core samplers (slide hammer), liners inserted manually into the soil, or hand trowels. In addition, samples may be obtained directly from the trench or from the backhoe bucket. All samples shall be properly sealed and labeled according to Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody*, and immediately placed on ice in a cooler as indicated in Procedure III-F, *Sample Handling, Storage, and Shipping*. Sample locations and descriptions shall be described and recorded on the field trench/pit log.

Trench or pit samples submitted for VOC analysis must be collected using the procedure found in Attachment I-B-1-1.

The exposed materials shall be observed for lithologic and contaminant characteristics following completion of the excavation activities. Detailed mapping of the exposed walls of the trench shall be conducted, although in no instance shall personnel enter a trench without first determining acceptable entry conditions including sloping, shoring, and air monitoring requirements, PPE, and inspections as defined in 29 CFR 1910.146. A useful mapping technique for extremely long trenches or large pits is to examine the vertical profile of the excavation at horizontal intervals of 5 to 10 feet, in a manner similar to the method typically used for preparation of a geologic cross-section using soil borings. Field observations shall be noted in the field logbook and described in detail on a trench/pit log. An example of a field trench/pit log is presented in Figure I-B-1-2. The lithologic description shall include all soil classification information listed in Procedure I-E, *Soil and Rock Classification*. A cross-section of the trench or pit should also be included on the field trench/pit log. Photographs of the trench/pit are also an excellent way to document important subsurface features.

During backfilling of the excavation, the materials excavated from the greatest depth should be placed back into the excavation first. Lithologic materials should be replaced in 2- to 4-foot lifts and recompacted by tamping with the backhoe bucket. For certain land uses or site restoration, more appropriate compaction methods may be required. These methods shall be described in the CTO WP and design documents. The backfilled trench/pit shall be capped with the original surface soil. If materials are encountered that cannot be placed back in the excavation, they should be placed either in DOT-approved open-top drums or placed on and covered with visqueen or equivalent material and treated as IDW in accordance with Procedure I-A-6, *Investigation-Derived Waste Management.*

5.4 SURFACE SOIL SAMPLING

All surface soil samples shall be accurately located on field maps in accordance with Procedure I-I, *Land Surveying.* Detailed soil classification descriptions shall be completed in accordance with

Procedure I-E, *Soil and Rock Classification* and recorded on the surface and shallow soil sample log (Figure I-B-1-3).

In general, surface soil samples are not to be analyzed for VOCs unless there is sufficient evidence to suggest the presence of such compounds.

Methods commonly used for collection of surface soil samples are described below. Considerations when using IS methods are provided in Attachment I-B-1-1.

5.4.1 Hand Trowel

A stainless-steel or disposable hand trowel may be used for sampling surface soil in instances where samples are not to be analyzed for volatile organics. The hand trowel is initially used to remove the uppermost 2 inches of soil and is then used to acquire a representative sample of deeper materials to a depth of 6 inches. Generally, only samples within the upper 6 inches of soil should be sampled using these methods. The depth of the sample shall be recorded in the surface and shallow soil sample log (Figure I-B-1-3). The soil classification shall include all the information outlined in Procedure I-E, *Soil and Rock Classification*.

Soil samples collected using a hand trowel are usually placed into pre-cleaned, wide-mouth glass jars. The jar is then sealed with a tight-fitting cap, labeled according to Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody*, and placed on ice in a cooler in accordance with Procedure III-F, *Sample Handling, Storage, and Shipping*. All sampling equipment must be decontaminated prior to each use according to the methods presented in Procedure I-F, *Equipment Decontamination*.

5.4.2 Hand Auger

A soil recovery hand auger consisting of a metal rod, handle, detachable stainless-steel core barrel, and inner sleeves can be used to obtain both surface soil and trench samples. Multiple extensions can be connected to the sampler to facilitate the collection of samples at depths up to 15 feet below the existing ground surface.

Pre-cleaned sample liners are loaded into the core barrel prior to sampling. In general, these liners are used not only to collect samples, but also to serve as the sample container. Alternatively, in instances where VOCs are not to be analyzed or where not enough samples can be collected to completely fill a liner, samples can be transferred to wide-mouth glass jars. In either case, the sample shall be labeled according to Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody* and immediately placed on ice in a cooler as indicated in Procedure III-F, *Sample Handling, Storage, and Shipping*. To minimize possible cross-contamination, the soil recovery hand auger and sample liners shall be decontaminated prior to each use according to the procedures described in Procedure I-F, *Equipment Decontamination*.

5.4.3 Slide Hammer Sampling

In instances where the soil type precludes the collection of soil samples using the soil recovery hand auger, a manually operated slide hammer can be used to collect relatively undisturbed soil samples from excavations and surface soils. The slide hammer consists of a 6- to 12-inch core barrel that is connected to the slide hammer portion of the device using detachable extensions.

The core sampler is typically loaded with two to four sample liners, depending on the liner length, which are not only used to acquire the samples, but also serve as the sample container. Immediately following acquisition, samples shall be labeled according to Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody* and immediately placed on ice in a cooler as indicated in Procedure III-F, *Sample Handling, Storage, and Shipping*.

All of the sampling equipment that comes into contact with the sample medium shall be decontaminated in accordance with Procedure I-F, *Equipment Decontamination*. Split-barrel slide hammer core samplers, which have recently become available, are much easier to decontaminate than the older, single-piece core barrel, and should be used in place of the older core barrels where possible.

FIELD LOG OF TRENCH/PIT

Project Name							
Trench Number		Project Number	Elevation and Datum			Location	
Equipment Supplier		Operator	Date and Time Started			Date and Time Completed	
Equipment Type		Trench Orientation	Total Depth			Total Number of Samples	
Bucket Width	Trench Length	Trench Width	No. Of Samples	Bulk	Ss	Drive	Hand Auger
Geologist or Hydrogeologist/Date			Check by/Date				

SOIL DESCRIPTION

LITHOLOGY	DEPTH (FEET)	DESCRIPTION	USCS SYMBOL	Est. % of G	Est. % of S	Est. % of F	COMMENTS
							Description taken _______ feet
							from ______ end of trench.

Figure I-B-1-2: Field Log of Trench/Pit

SURFACE AND SHALLOW SOIL SAMPLE LOG

Project Number	Project Name	Date	Time
Sample Identification Number and Time		Checked by	
Sampled by		Recorded by	
Method of Collection			
Surface Description			
Notes			

Soil Sample Data

Location	
Coordinates	Elevation

LITHOLOGY	DEPTH (FEET)	DESCRIPTION	USCS SYMBOL	Est. % of G	S	F	COMMENTS

Figure I-B-1-3: Surface and Shallow Soil Sample Log

5.4.4 Hand Sampling Using Sample Liners

Surface soil samples can sometimes be collected by hand using just the sample liners. This method can be used in cases where the surface soils are soft or where it is advantageous to minimize the disturbance of the sample (such as when sampling for volatiles). Obtaining surface soil samples with this method consists merely of pushing or driving the sample tube into the ground by hand.

The sample liner (with the collected sample inside) is then removed from the ground and capped with Teflon film and plastic end caps. The sample is labeled according to Procedure III-E, *Record Keeping, Sampling Labeling, and Chain-Of-Custody* and immediately placed on ice in a cooler. All liners shall be decontaminated prior to use in accordance with Procedure I-F, *Equipment Decontamination*. Since the only pieces of equipment used are the sample liners, this method helps to minimize the required amount of equipment decontamination.

5.5 Volatile Organics Screening and Headspace Analysis

Volatile organics screening and headspace analysis is performed to preliminarily assess if the sample contains VOCs. Volatile organics screening and headspace analysis of samples shall be performed using a portable organic vapor analyzer (OVA), a portable photoionization detector (PID), or other similar instrument.

Volatile organics screening and headspace analysis is intended as a field screen for the presence of VOCs. The method measures the presence or absence of VOCs in the headspace (air) above a soil sample. Various factors affect the level of VOCs volatilizing from soils, such as concentration in the soil, temperature of the soil and air, organic carbon content of the soil, equilibration time, moisture content of the soil, and the chemical and physical characteristics of the VOCs. Therefore, headspace readings can only be regarded as qualitative assessments of volatiles, and caution should be exercised if using this technique to select samples for analytical testing. OVA and PID readings can vary because the two instruments have different sensitivities to the various VOCs and are usually calibrated relative to different gas standards (i.e., methane for the OVA and isobutylene for the PID).

In order to screen samples for VOCs, the instrument probe shall be inserted into the top of the sample liner immediately after the sampler is opened. The instrument response (normally in parts per million) is then recorded in the field notebook and/or the field log.

For headspace analysis, a portion of the sample is transferred into a zipper storage bag or pre-cleaned glass jar, which is then sealed and agitated. The VOCs are allowed to volatilize into the headspace and equilibrate for 15 to 30 minutes. Next, the instrument probe is then inserted into the container to sample the headspace, and the instrument response is recorded in the field notebook and/or the field log.

6. Records

Soil classification information collected during soil sampling should be documented in borehole, trench, and surface soil log forms. All log entries shall be made in indelible ink. Information concerning sampling activities shall be recorded on sample log forms or in the field logbook. The CTO Manager or designee shall review all field logs on at least a monthly basis. Procedures for these activities are contained in this manual. Copies of this information should be sent to the CTO Manager and to the project files.

7. Health and Safety

Field Personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

ASTM International (ASTM). 2005. *Standard Guide for Direct Push Soil Sampling for Environmental Site Characterizations*. ASTM D6282-98. West Conshohocken, PA.

———. 2006. *Standard Practice for Rock Core Drilling and Sampling of Rock for Site Investigation.* D2113-06. West Conshohocken, PA.

Department of Defense, United States (DoD). 2005a. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

———. 2005b. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2B: Quality Assurance/quality Control Compendium: Minimum QA/QC Activities*. Final Version 1. DoD: DTIC ADA 426957, EPA-505-B-04-900B. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www2.epa.gov/sites/production/files/documents/qaqc_v1_0305.pdf.

———. 2012. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2A: Optimized UFP-QAPP Worksheets*. Revision 1. March.

Department of the Navy (DON). 2007. *Environmental and Natural Resources Program Manual*. OPNAV Instruction 5090.1C. 30 October.

———. 2010. Ammunition and Explosives Safety Ashore. NAVSEA OP 5 Volume 1, 7th Revision, Change 11. 0640-LP-108-5790. Commander, Naval Sea Systems Command. July 1.United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual*. EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-A-6, *Investigation-Derived Waste Management.*

Procedure I-C-1, *Monitoring Well Installation and Abandonment.*

Procedure I-E, *Soil and Rock Classification*.

Procedure I-F, *Equipment Decontamination.*

Procedure I-I, *Land Surveying.*

Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody.*

Procedure III-F, *Sample Handling, Storage, and Shipping.*

9. Attachment

Attachment I-B-1-1: Sampling and Handling Procedure: Analysis of Soil for Volatile Organic Compounds

Geophysical Testing

1. Purpose

This section sets forth the standard operating procedure for acquiring surface geophysical data to facilitate the collection of geologic, hydrogeologic, and geotechnical data related to hazardous waste site characterization. This procedure is for use by personnel working on the United States Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

This procedure has been developed to help personnel: (1) determine whether surface geophysics should be used at a site; (2) choose the most applicable methods for a particular objective; and (3) implement proper field procedures. The specific supporting information explaining how various geophysical techniques will be applied shall be defined in the project-specific work plan (WP).

3. Definitions

For a more complete set of terms and definitions, refer to R. E. Sheriff (1991).

3.1 COUPLING

Coupling is the interaction between systems, and includes the following:

- A device for fastening together, as the plugs for connecting electrical cables.
- Aspects, which affect energy transfer. Thus the “coupling of a geophone to the ground” involves the quality of the plant (how firmly the two are in contact) and also considerations of the geophone's weight and base area because the geophone-ground coupling system has natural resonances and introduces a filtering action.
- The type of mutual electrical relationship between two closely related circuits. As coupling would exclude dc voltages by employing a series capacitive element. Direct coupling may exclude higher frequency signals by using a capacitive element across the inputs or may allow all components to pass.

- Capacitive coupling may occur because of mutual capacitive impedance, as between the wires in induced polarization (IP) circuits (see Section 3.6) or between a wire and ground.
- Inductive coupling occurs because of mutual inductive impedance, such as between grounded IP transmitter and receiver circuits, especially at higher frequencies, greater distances, or lower earth resistivity. This may give rise to false IP anomalies. Also called electromagnetic (EM) coupling.
- Resistive coupling in IP surveying is due to leakage between wires, between a wire and ground, or through the resistance of the ground itself between two grounded circuits.

3.2 ELECTRICAL LOG

- A generic term that encompasses all electrical borehole logs (spontaneous potential [SP], normal, lateral, laterologs, induction, microresistivity logs).
- Also used for records of surface resistivity surveying; to compare electrical survey.
- Electrolog, a borehole log, which usually consists of SP and two or more resistivity logs, such as short and long normal and long lateral resistivity logs. Electrolog is a Dresser Atlas trade name.

3.3 ELECTRICAL SOUNDING

Electrical sounding is an IP, resistivity method, or electromagnetic method in which electrode or antenna spacing is increased to obtain information from successively greater depths at a given surface location. Electromagnetic sounding can also be done with a fixed spacing by varying the frequency (time-domain technique). Electrical sounding is intended to detect changes in resistivity of the earth with depth at this location (assuming horizontal layering).

Electrical Survey:

- Measurements at or near the earth's surface of natural or induced electrical fields to map mineral concentrations or for geological or basement mapping. (See electrical profiling, electrical sounding, electromagnetic method, resistivity method, self-potential method, induced-polarization method, telluric method, and magnetotelluric method).
- Electrical logs run in a borehole.

3.4 ELECTROMAGNETIC METHODS

A method in which the magnetic or electrical fields associated with artificially generated subsurface currents are measured. In general, EM methods are those in which the electric and magnetic fields in the earth satisfy the diffusion equation (which ignores displacement currents) but not Laplace's equation (which ignores induction effects) nor the wave equation (which includes displacement currents). One normally excludes methods that use microwave or higher frequencies (and that consequently have little effective penetration) and methods that use direct coupling or very low frequencies in which induction effects are not important (resistivity and IP methods). Some methods that employ natural energy as the source, such as Afmag, are usually classified as EM methods, whereas other methods using natural energy, such as the magnetotelluric method, are not.

3.5 Geophysics

- The study of the earth by quantitative physical methods, especially by seismic reflection and refraction, gravity, magnetic, electrical, and radiation methods.
- The application of physical principles to study the earth. Includes the branches of: (a) seismology (earthquakes and elastic waves); (b) geothermometry (heating of the earth, heat flow, and volcanology and hot springs); (c) hydrology (ground and surface water and sometimes including glaciology); (d) oceanography; (e) meteorology; (f) gravity and geodesy (the earth's gravitational field and the size and form of the earth); (g) atmospheric electricity and terrestrial magnetism (including ionosphere, Van Allen belts, telluric currents); (h) tectonophysics (geological processes in the earth); and (i) exploration and engineering geophysics. Geochronology (the dating of earth history) and geocosmogony (the origin of the earth). These are sometimes added to the foregoing list. Enthusiasts in particular branches are inclined to appropriate the word "geophysics" to their own branch exclusively, whether that branch be ionospheric studies or exploration for oil.
- Exploration geophysics is the use of seismic, gravity, magnetic, electrical, EM, etc., methods in the search for oil, gas, minerals, water, etc., for economic exploitation.

3.6 Induced Polarization

- IP is an exploration method involving measurement of the slow decay of voltage in the ground following the cessation of an excitation current pulse (time-domain method) or low frequency (below 100 Hertz) variations of earth impedance (frequency-domain method). Also known as the overvoltage method. Refers particularly to electrode polarization (overvoltage) and membrane polarization of the earth. Also called induced potential, overvoltage, or interfacial polarization. Various electrode configurations are used.
- The production of a double layer of charge at mineral interfaces or of changes in such double layers as a result of applied electric or magnetic fluids.

3.7 Low-velocity Layer

- Weathering; a near-surface belt of very low-velocity material.
- A layer of velocity lower than that of shallower refractors (i.e., blind zones).
- The B-layer in the upper mantle from 60 to 250 kilometers deep, where velocities are about 6 percent lower than in the outermost mantle.
- The region just inside the earth's core.

3.8 Resistance

Resistance is the opposition to the flow of a direct current.

3.9 Resistivity

Resistivity is the property of a material that resists the flow of electrical current. Also called specific resistance. The ratio of electric-field intensity to current density. The reciprocal of resistivity is conductivity. In nonisotropic material, the resistivity is a tensor.

3.10 RESISTIVITY LOGS

- Well logs that depend on electrical resistivity, normal, lateral, laterolog, and induction log. Most resistivity logs derive their readings from 10 to 100 cubic feet of material about the sonde. Microresistivity logs, however, derive their readings from a few cubic inches of material near the borehole wall.
- Records of surface resistivity methods.

3.11 RESISTIVITY METHOD

- Observation of electric fields caused by current introduced into the ground as a means for studying earth resistivity in geophysical exploration. The term is normally restricted to those methods in which a very low frequency or direct current is used to measure the apparent resistivity. Includes electrical profiling and electrical sounding. Various array types are used.
- Sometimes includes IP and EM survey methods also.

3.12 SEISMIC SURVEY

Seismic survey is a program for mapping geologic structure by creating seismic waves and observing the arrival time of the waves reflected from acoustic-impedance contrasts or refracted through high-velocity members. A reflection survey is usually implied unless refraction survey is specifically mentioned. The energy source for creating the waves is usually impulsive (i.e., energy is delivered to the earth for a very short period of time) although energy is introduced for considerable time with the Vibroseis method. The energy is detected by arrays of geophones or hydrophones connected to amplifiers, and the information is amplified and recorded for interpretation. The data often are processed to enhance the wanted information (signal) and displayed in record-section form. Signal is recognized as a coherent event, although noise often is coherent also. Events considered to be reflections from acoustic-impedance contrasts (reflectors) are used to locate the reflectors, it being assumed that their attitudes are that of the geologic structure. Events attributed to be head waves are used to locate the refractors of which they are characteristic, it being assumed that the attitudes of these refractors are those of the geologic structure. Velocity analysis is also done on reflection data where the offset varies.

3.13 SELF-POTENTIAL/SPONTANEOUS POTENTIAL

- The direct coupling or slowly varying natural ground voltage observed between nearby non-polarizing electrodes in field surveying. In many mineralized areas, this is caused by electrochemical reaction at an electrically conducting sulfide body.
- A well log of the difference between the potential of a movable electrode in the borehole and a fixed reference electrode at the surface. The SP results from electrochemical SP and electrokinetic potentials, which are present at the interface between permeable beds adjacent to shale. In impermeable shales, the SP is fairly constant at the shale base-line value. In permeable formations, the deflection depends on the contrast between the ion content of the formation water and the drilling fluid, the clay content, the bed thickness, invasion, and bed-boundary effects, etc. In thick, permeable, clean non-shale formations, the SP has the fairly constant sand line value, which will change if the salinity of the formation water changes. In sands containing disseminated clay (shale), the SP will not reach the sand line and a pseudostatic SP value will be recorded. The SP is positive with respect to the shale base line in sands filled with fluids fresher than the borehole fluid.

3.14 TELLURIC

Telluric means of the earth, and often refers specifically to telluric currents.

3.15 TELLURIC CURRENT

Telluric current is a natural electrical earth current of very low frequency that extends over large regions and may vary cyclically in that direction. Telluric currents are widespread, originating in variations of the earth's magnetic field.

4. Responsibilities

CTO Managers are responsible for determining whether surface geophysical methods should be used on a project and if so, which methods should be used. This information should be included in the project-specific WP. The objectives of the geophysical investigation shall be stated explicitly in the subcontract WP. Further, deliverables by the subcontractor shall be clearly identified in the WP so the prime contractor knows what to expect from the subcontractor. The CTO Manager is responsible for ensuring that all personnel involved in sampling and/or testing shall have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager (FM) is responsible for ensuring that the appropriate selected procedures are conducted according to the instructions in this manual and the project specific sampling plan. In many cases, subcontractors will conduct these procedures. In these situations, the FM is responsible for overseeing and directing the activities of the subcontractor. The need to establish site-specific quality control procedures is particularly important.

Field personnel are responsible for the implementation of this procedure.

5. Procedures

5.1 METHOD SUMMARY

A wide variety of surface-based geophysical methods exist that may apply to contamination delineation, geologic, hydrogeologic, or other site characterization/investigation requirements. In general, geophysical exploration methods provide for a non-invasive mapping of subsurface features through the measurement of the physical properties of a subsurface. Typically, an active signal (e.g., acoustic or electrical) propagates into the earth and the interaction of the signal with the subsurface materials is measured at the surface. Interpretation of the data provides a map or image of the subsurface. For example, electrical conductivity of soil governs the propagation of an electrical signal through the subsurface. The geologic/hydrologic/waste characteristics are then inferred from an interpretation of the data or correlated with borehole data.

For a geophysical survey to be successful, the method of choice must be capable of resolving a particular physical characteristic that relates to the goals of the investigation. For example, if a zone of contaminated groundwater is being investigated by an electrical method, the electrical conductivity of the contaminated portion of the aquifer should be sufficiently different from the uncontaminated portion to allow for identification of the ‘plume’. If the target (i.e., the high-conductivity plume in this example) does not contrast sufficiently with the uncontaminated portion, then the geophysical survey will not be successful. Often, preliminary calculations or a trial survey can be performed to evaluate a particular method.

For purposes of this procedure, the geophysical methods discussed herein are classified as follows:

- *Seismic Methods:* These include seismic refraction and reflection methods and are typically applied to investigate depths to water or geologic structures (stratigraphic horizons or depth to bedrock).
- *Electrical Methods:* A wide variety of these exist including Direct Current (DC) Resistivity, Low-Frequency EM Induction (i.e., loop-loop methods), Very Low Frequency EM, Ground Penetrating Radar (GPR), Complex Resistivity/IP, metal detection equipment, and SP profiling. These respond to variations in the electrical properties of a site, specifically the electrical conductivity and (for GPR) the dielectric/permittivity constant. Applications include general geologic/hydrologic mapping, identification of solute 'plumes,' and the detection of conductive metallic debris/objects.
- *Potential Field Methods:* Some methods do not require an active signal source and instead measure naturally occurring potential fields of the earth. These include measurements of the earth's magnetic or gravitational fields. Magnetic methods are often used to detect the response of the earth's magnetic field to metallic objects and can be very effective in locating buried metallic materials. Gravity methods respond to subtle density variations and are typically used to map the depth/thickness of alluvial basins or to detect cavities within consolidated sediments (e.g., Karst sinkholes).

While a number of geophysical methods may be applied at hazardous waste sites, the scope of this procedure is limited to the following commonly applied methods:

Seismic:	Refraction
Electrical:	DC Resistivity
	EM Induction (Loop-Loop)
	GPR
	Metal Detection
	IP
	SP Profiling
Potential Field:	Magnetics

Often, geophysical contractors specialize in a particular survey method. The following references may be useful to provide additional information:

Dobrin, M. B. and C. H. Savit. 1988. *Introduction to Geophysical Prospecting*. McGraw-Hill.

Journals: Geophysics (Society of Exploration Geophysics); Geophysical Exploration European Association of Exploration Geophysicists; occasionally - Groundwater, Groundwater Monitoring Review (National Water Well Association).

Sheriff, R. E. 1991. *Encyclopedic Dictionary of Exploration Geophysics*. Society of Exploration Geophysics.

Telford, W. M., L. P. Geldart, R. E. Sheriff, D.A. Keys. 1998. *Applied Geophysics*. Cambridge University Press.

5.2 METHOD LIMITATIONS/INTERFERENCES AND POTENTIAL PROBLEMS

Each of the geophysical methods discussed herein are typically designed and implemented on a site-specific basis. Exercise care to ensure that a particular method is applicable and that an identifiable target is likely to exist. A determination must be made that the exploration target can be resolved versus the background signal/site conditions and that cultural or other 'noise' problems will not interfere. 'Cultural Noise' is defined as near-surface or surficial features (e.g., power lines or traffic vibrations) that can potentially mask or overwhelm the signal produced by the subsurface target.

All of the survey methods require field instrumentation and electronics that might be impacted by extreme climactic variations. Check the equipment regularly (daily, at a minimum) to ensure internal calibration. Review the manufacturers' guidelines and specifications prior to field application.

5.2.1 Seismic Method Limitations and Potential Problems

5.2.1.1 REFRACTION SURVEYS

Care should be exercised in avoiding the following potential problems:

- Poorly emplaced geophones (e.g., in loose soil)
- Poor couplings of induced signal (e.g. strike plate) with ground
- Intermittent electrical shorts in geophone cable (never drag geophone cables)
- Wet geophone connections
- Vibration due to wind and traffic-induced noise
- Improper gain/filter settings
- Insufficient signal strength
- Topographic irregularities (an accurate topographic survey is often required prior to field operations)

5.2.2 Electrical Method Limitations and Potential Problems

5.2.2.1 DC RESISTIVITY

Measurement of electrical resistivity represents a bulk average of subsurface material resistivity. In some instances, the resistivity of the target material may not contrast sufficiently with 'background' material to be observed with this method, especially as the target material gets thinner and/or deeper. If highly conductive soil/rock are present at shallow depths, electrical current may not penetrate to depths beyond this layer. An electrical current always follows the path of least resistance.

Care should be exercised in avoiding the following potential problems:

- Poorly coupled electrodes (insufficient grounding)
- Unshielded wires causing intermittent shorts
- Background electrical noise, such as natural currents (SP or telluric effects)
- EM coupling with power lines, causing the introduction of induced electrical currents into the receiver wire
- Grounded fence lines and power lines interfering with the survey
- Inadequate signal power (increase current levels to produce sufficient signal to noise ratios)
- Very low resistivity layer at the surface preventing the electrical field from penetrating deeper layers
- Very high resistivity layer at the surface (e.g. dry sandy gravel) preventing the electrical field from penetrating the surface layer

5.2.2.2 EM METHOD

A variety of EM methods may be applied; however, in practice, the Geonics EM31-MK2 and EM34-3 Loop-Loop instruments are usually used in hazardous waste surveys. The EM methods are similar to DC methods in application and are sensitive to conductive materials, except for the basic distinction that they are not electrically grounded. Complications may arise in the EM method in developed sites because aboveground, metallic objects or electrical fields may interfere. Power lines, automobiles, train tracks, water tanks, and other objects may completely dominate data results and render the method useless.

5.2.2.3 GPR METHODS

GPR methods are seldom useful where highly conductive conditions or clay is present at shallow depths. The high-frequency signal propagates as a function of both electrical conductivity and dielectric constant (permittivity). The selection of transmission frequency is important because high frequencies are rapidly attenuated and the signal may not penetrate. Often, a choice of frequencies is available and it is suggested to perform site-specific field tests over known, observable targets to determine whether GPR is appropriate for use.

Care should be exercised in avoiding the following potential problems:

- Improperly adjusted/configured equipment (e.g., antenna gain, filter slopes or gain thresholds)
- Insufficient signal and/or poor transmission qualities of the materials found at a site (e.g. clay, saline water conditions)
- The influence of reflected signals outside of the immediate zone of investigation upon the radar record (e.g., fences, power poles, buildings)

5.2.2.4 METAL DETECTION

Metal objects that are not survey targets, including those worn or carried by the operator, might interfere with measurements.

5.2.3 Potential Field Method Limitations and Problems

5.2.3.1 MAGNETICS

The signal measured by a magnetometer varies with time and is subject to variations induced by solar storms. Care should be exercised in avoiding the following potential problems:

- Metal objects that are not survey targets, such as those worn or carried by the operator and surficial metallic objects, interfering with measurements
- Lack of base station control to measure background field fluctuations
- Failure to maintain a constant sensor height with respect to ground elevation

5.3 SURVEY DESIGN/PRE-FIELD PREPARATION

5.3.1 Survey Design

Prior to performing a field investigation, it is often possible to estimate the effectiveness of a surface geophysical survey by using data interpretation software relevant to the survey or by other calculation methods. A sensitivity analysis is usually performed to determine if a geophysical target possesses sufficient contrast with background conditions to be detected using surface geophysics. In some instances, available site data or prior geophysical investigations may be available to obtain estimates of the geophysical characteristics of the site.

5.3.2 Field Preparation

- Verify that the required geophysical equipment is pre-calibrated and operational.
- Establish grid locations or set up traverses for location of sampling stations.
- Survey the station locations and record them on a scaled site plan.
- Test and calibrate geophysical equipment.

5.4 FIELD PROCEDURES

The following procedures apply to geophysical surveys conducted at a hazardous waste site. Procedures may vary since equipment capabilities and methodologies are rapidly evolving. In general, survey field locations, accurately record them, and ensure that the equipment is functional and calibrated. Typically, a control or base station location will be established to check the equipment response over the duration of the field investigation. In addition, ensure a high signal to noise ratio can be maintained to obtain a geophysical response representative of the target/zone of interest.

5.4.1 Seismic Refraction Methods

Use seismic refraction techniques to determine the structure of a site based upon the travel time or velocity of seismic waves within layers. Interpretation of the travel time variation along a traverse of geophones can yield information regarding the thickness and depth of buried strata. Seismic methods are often used to determine depths to specific horizons of contrasting seismic velocities, such as bedrock, clay layers, or other lithologic contrasts, and the water table (under unconfined conditions).

Procedures

- Check the seismic signal and noise conditions on the instrument to verify the proper functioning of geophones and cables and to check the instrument settings.
- When the seismic field equipment does not produce hard copies of seismic records, immediately plot the arrival time selected from the electronic display on a time/distance graph in the field. Produce a hard copy of the data, and keep it in the record file. Problems with improper picks are often discovered by early inspection of these plots.
- Background or offsite data may be required for correlation to site conditions. Correlation of the seismic data with electrical method results, if obtained, or with borehole or outcrop data, may be a useful means of assigning thickness or seismic velocities.
- If possible, analyze boring logs or other data to determine if low velocity (inverse layers) or thin beds may be present that might not be detected otherwise.
- Run the seismic system at a known standard base station for periodic checks of instrument operation.
- Properly store the data in digital form for subsequent processing and data evaluation.

5.4.2 Electrical Methods

5.4.2.1 DC Resistivity

The resistivity method provides a measurement of the bulk electrical resistivity of subsurface materials. Application of the method requires that a known electrical current be induced into the ground through a pair of surface electrodes. Measure the resulting potential field (voltage) between a second pair of surface electrodes. Evaluate the subsurface electrical properties based on the current, voltage, and electrode position (array configuration).

Given the length of the wire cables, their connections to the electrodes, and the coupling of the electrodes with the ground, there are a number of potential problems for obtaining reliable data (e.g., poor electrical contact, short and open circuits). These conditions can be minimized by careful observation of instrument readings and trends.

Procedures

- Calculate and plot apparent resistivities during field acquisition as a means of quality control. If vertical electrical sounding is performed, the data plots (curves) should be smooth, and discontinuous jumps in the data should not occur. Profiling data should also show a general trend in the data from one station to the next; however, abrupt changes may occur in both sounding and profiling data due to “noise” from near-surface inhomogeneities or electrode contact problems.
- The resistivity instrument can be calibrated using standard resistors or by using the internal calibration circuits often contained within the equipment. Calibration is particularly important if the data are to be compared to resistivity measurements from other instruments or other parameters, such as specific conductance of water samples.

5.4.2.2 EM Methods

EM methods provide a means of measuring the electrical conductivity of subsurface soil, rock, and groundwater. Electrical conductivity (the inverse of electrical resistivity) is a function of the type of soil, porosity, permeability, and the conductivity of fluids in the pore spaces. The EM method can be used to map natural subsurface conditions and conductive contaminant plumes. Additionally, trench boundaries, buried conductive wastes, such as steel drums, metallic utility lines, and steel underground storage tanks, might potentially be located using EM techniques.

Following factory calibration, the instruments will normally retain their accuracy for long periods; however, the user should establish a secondary standard area at the field site for periodic recalibration. This will provide a reference base station to check “drift” in the instrument’s performance and to permit correlation between instruments.

While precision can be easily checked by comparing subsequent measurements with the instrument at a standard site, accuracy is much more difficult to establish and maintain.

EM instruments are often used to obtain relative measurements. For these applications, it is not critical to maintain absolute accuracy; however, the precision of the instrument can be important. For example, in the initial mapping of the spatial extent of a contaminant plume, a moderate level of precision is necessary. If the same site is to be resurveyed annually to detect small changes in plume migration and movement, a very high level of precision is necessary.

If the objective of the survey is to obtain quantitative results from the EM data for correlation to other measurable parameters (e.g., specific conditions), proper steps should be taken to ensure good instrument calibration. This is particularly important when performing surveys in areas of low conductivity, where measurement errors can be significant.

The dynamic range of EM instruments varies from 1 to 1,000 millimhos/meter (mmho/m). At the lower conductivities, near 1 mmho/m and less, it is difficult to induce sufficient current in the ground to produce a detectable response; hence, readings may become unreliable. At conductivity values greater than about 100 mmho/m, the received signal is no longer linearly proportional to subsurface conductivities, and corrections must be applied to the data, if it is to be used for quantitative purposes.

Procedures

- Maintain or verify calibration records from the equipment supplier or manufacturer. Calibrate the EM system regularly.
- Prior to conducting a survey, select a temporary site on location for daily calibration checks. Conduct calibration checks twice daily, before and after conducting daily survey operations. Readings shall repeat to +/-5 percent. Originals of all calibration records shall remain on site during field activities, and copies shall be submitted to the records file. The original calibration records shall be transferred to the project files upon completion of the fieldwork.

  Note: Conduct calibration checks outside the influence of power lines, buried utilities, buried metal objects, fences, etc. on a relatively flat surface.

- The field operating party shall check instrument stability when there is local or distant thunderstorm activity. EM radiation from thunderstorms can generate noise in the EM system. It may be necessary to postpone operations during rainstorms and resume them when they have passed.
- Exercise technical judgment such that conductivity readings recorded in the field are reasonable with respect to existing site conditions.
- Record instrument sensitivity settings in the field notebook as readings are taken. Submit the notebook to the records file.

5.4.2.3 GPR

GPR uses high frequency radio waves to acquire subsurface information. Energy is radiated downward into the subsurface through a small antenna, which is moved slowly across the surface of the ground. Energy is reflected back to the receiving antenna, where variations in the return signal are continuously recorded. This data produces a continuous cross sectional “picture” or profile of shallow subsurface conditions. These responses are caused by radar wave reflections from interfaces of materials having different electrical properties. Such reflections are often associated with natural hydrogeologic conditions, such as bedding, cementation, moisture content, clay content, voids, fractures, and intrusions, as well as manmade objects. The radar method has been used at numerous hazardous waste sites to evaluate natural soil and rock conditions, as well as to detect buried wastes and buried metallic objects.

The radar system measures two-way travel time from the transmitter antenna to a reflecting surface and back to the receiver antenna. Calibration of the radar system and data requires a two-step process:

- First, accurately determine the total time window (range) set by the operator.
- Second, determine the EM velocity (travel time) of the local soil-rock condition.

After completing these two steps, the radar data may then be calibrated for depths of particular features.

Calibrate the time window (range) that has been picked for the survey by using a pulse generator in the field. This generator is used to produce a series of time marks on the graphic display, measured in nanoseconds. These pulses are counted to determine the total time range of the radar. A calibration curve can be made up for each radar system.

In order to precisely relate travel time to actual depth units, determine the velocity (or two-way travel time per unit distance) for the particular soil or rock found at the site.

Various levels of accuracy in determining travel time can be used. These may range from first order estimates to precisely measured onsite values.

Using the depth of a known target (trenches, road cuts or buried pipes/road culverts can provide a radar target of known depth), a radar record taken over the known target, and a time scale provided by the pulse generator will provide basic calibration record. From these data, a two-way travel time can be accurately determined at the given target location. Because this approach may give accurate calibration at the specific site, it must be assumed that conditions in other areas to be surveyed are the same as in the calibration areas. If they are not, errors will occur in determining depths.

If significant changes in soil type or moisture content occur with depth, travel time will not be the same throughout the vertical radar profile, and the vertical radar depth scale may be non-linear. Such a condition is common, and occurs whenever an unsaturated zone exists over a saturated zone.

Procedures

- Check the time scale of the GPR unit regularly for accuracy. This can be done either on or off the site by placing the GPR unit at a known distance from the ground, a wall, etc., and measuring the two-way travel time to that reflecting surface in the air. The velocity of electromagnetic waves in air is 1 foot per nanosecond (3×10^8 meters per second). The following equation shall be used:

$$t = 2d/c$$

Where:

t	=	two-way travel time from antenna to the surface (nanoseconds)
d	=	distance of antenna to the surface (feet)
c	=	velocity of light in air, (1 foot/nanosecond)

- Prior to conducting a survey, conduct a GPR traverse over a buried object of known depth (if available). From the two-way travel time and the measured burial depth of the object, the average electromagnetic wave velocity in soil can be calculated from the following equation:

$$V = 2d/t$$

The average dielectric constant of the soil is then calculated using:

$$Er = c^2/v^2$$

Where:

Er	=	average relative dielectric constant of soil (unitless)
c	=	velocity of light in air (1 foot/nanosecond)
v	=	average electromagnetic wave velocity of the soil (feet/nanosecond)

Note: The equation above assumes a soil with a relative magnetic permeability of 1. Exercise technical judgment such that soil velocity and relative dielectric constant values are reasonable with respect to existing site conditions.

- A short GPR traverse shall be repeated twice daily over a known feature prior to and after conducting daily operations. Exercise technical judgment to ensure that variations between repeat readings are due to changing soil conditions rather than the electronics.

5.4.2.4 METAL DETECTION - MAGNETOMETERS

Magnetometers are designed to provide measurements of the earth's magnetic field. In hazardous waste site investigations, magnetometers are invaluable for detecting buried drums and for delineating the boundaries of areas containing ferrous metallic debris.

Procedures

- Check the proposed date of the magnetic survey for solar flares to ensure that anticipated background conditions do not occlude data collection (Bureau of Standards, Boulder, CO, Goldendale, WA).
- Obtain a daily background reading in the immediate vicinity of the site to be surveyed. This reading should be outside the influence of all sources of cultural magnetic fields (e.g., power lines, pipeline). Exercise technical judgment such that the background reading is reasonable with regard to published data for the total magnetic field intensity at the site latitude and longitude. This daily background reading should repeat to within reasonable diurnal variations in the earth's magnetic field.
- Take sequential readings twice daily, before and after normal magnetic surveying operations. Take these readings (within 10 seconds of each other) at any location on site, distant from cultural magnetic fields, and record them in the field notebook. Two or three sequential readings should be sufficient. In the absence of magnetic storms (sudden and violent variations in the earth's magnetic field), the readings should compare within 0.1 to a few tenths of a gamma. Variations during magnetic storms may approach 1 gamma.
- Take base station readings so that the efforts of diurnal variation in the earth's magnetic field may be removed from the data. Magnetic storms can be detected if the base station sampling frequency is high enough. It may be necessary to postpone operations during magnetic storms and resume them when they have passed. Identification of such periods of rapid synoptic variation may be documented at a permanent base stations set up on site where continuous readings are automatically recorded every 10 to 15 minutes. Alternatively, readings may be manually recorded at base stations during the survey every 45 to 60 minutes.
- Use of automatic recording magnetometers requires recording the magnetometer readings for the first and last station of each traverse in a field notebook. At the end of the day, compare the data recorded in the field notebook with data from the automatic recording device. Data recorded in the field notebook should be within 1 gamma of the values derived from the recording device. It is recommended to transfer the data onto hard copies from the recording device on a daily basis.

Total field measurements may be corrected for these time variations by employing a reference base station magnetometer; changes in the earth's field are removed by subtracting fixed base station readings from the moving survey data. Gradiometers do not require the use of a base station, as they inherently eliminate time variation in the data.

5.4.2.5 SP PROFILING

This method is different from other electrical techniques in that no artificial current source is used to inject a signal into the ground; only the naturally occurring voltage potentials are measured between surface stakes. These natural voltages are produced by chemical oxidation reactions between groundwater and different soil and mineral types.

SP equipment consists of a digital, high-impedance volt meter; two porous pot electrodes; and cables. SP equipment should have a resolution of at least ±2 millivolts (mv) and accuracy within ±10 mv.

Procedures

- Calibrate equipment per the manufacturer's specifications. At a minimum, calibrate the equipment twice daily, once prior to beginning operations and once at the end of daily operations. Record calibration results in the field log.
- Each SP station shall be identified with a unique number and located on a site layout drawing. Record profiling results for each station using a field data form that includes the time of each measurement. Annotate the form to show any natural or cultural features near or between the SP stations.
- Establish a base station for the purpose of measuring instrument drift during the SP profiling activities. Take the instrument to the base station routinely during the day, and obtain readings from one location at the base station. Obtain base station readings at the beginning and end of each day and at interim intervals not exceeding 4 hours in duration.
- Reduce data by adjusting measurements obtained for instrument drift. Base station readings are plotted as a separate curve from profiling station measurements. The drift is interpolated (straight line) between base station readings as a function of time and the appropriate drift correction is subtracted from each profiling station measurement. Reduced data are used for interpretation.
- Interpret data by plotting reduced data (either for linear cross-sections of the study area or as surface contours over the study area surface). Anomalies are identified from these plots, and inferences regarding their sources are developed.

5.4.3 Post-Operations

Geophysical personnel working at a site should follow standard hazardous waste site protocols. In many cases, the geophysical survey may precede services that may result in personnel contact with hazardous waste/materials. Geophysical personnel at all sites should follow standard hazardous waste site decontamination procedures.

5.5 DATA REDUCTION/DATA INTERPRETATION

Geophysical surveys typically require significant data reduction and processing. The exact methodology depends upon the purpose, scope, and type of survey.

Data interpretation and presentation reports should include the following:

- Data reduction technique
- Data processing steps
- Technical basis for data processing

- Survey location data
- Site base map showing survey location or transects
- Dates and times of survey
- Interpretation results
- Theoretical assumptions for the interpretation
- Equipment used
- Data format (digital format, ASCII, SEG B.,)

5.6 QUALITY ASSURANCE/QUALITY CONTROL

The following QA procedures apply to all geophysical instrumentation and their use during data acquisition.

- Document all data transmittals on standard forms supplied by the geophysical subcontractor. Copies of these forms will be maintained with the field files on site.
- Operate geophysical instrumentation in accordance with operating instructions supplied by the manufacturer, unless otherwise specified in the work plan.
- Monitor battery voltage levels for all instruments each day throughout the survey. Charge or replace battery packs when voltage levels fall below the recommended level specified by geophysical equipment manufacturers.

6. Records

The FM is responsible for documenting all field activities in the field notebook. The FM should also oversee all subcontractor activities and ensure that their documentation is complete. The specific procedures used in the field shall be documented in the site characterization report or similar deliverable.

7. Health and Safety

Field Personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

Dobrin, M. B. and C. H. Savitt. 1988. *Introduction to Geophysical Prospecting*. McGraw-Hill.

Sheriff, R. E. 1991. *Encyclopedic Dictionary of Exploration Geophysics*. Tulsa, OK: Society of Exploration Geophysics.

Telford, W. M., L. P. Geldart, R. E. Sheriff, D. A. Keys. 1998. *Applied Geophysics*. Cambridge University Press.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual*. EM-385-1-1. Includes Changes 1–7. 13 July 2012.

9. Attachments

None.

Monitoring Well Installation and Abandonment

1. Purpose

This standard operating procedure describes the methods to be used by the United States (U.S.) Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific personnel during the installation of groundwater monitoring wells. It describes the components of monitoring well design and installation and sets forth the rationale for use of various well installation techniques in specific situations.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

3.1 FILTER PACK

Filter pack is sand or gravel that is smooth, uniform, clean, well-rounded, and siliceous. It is placed in the annulus of the well between the borehole wall and the well screen to prevent formation materials from entering the well and to stabilize the adjacent formation.

3.2 ANNULUS

The annulus is the downhole space between the borehole wall and the well casing and screen.

3.3 BRIDGE

An obstruction in the drill hole or annulus. A bridge is usually formed by caving of the wall of the well bore, by the intrusion of a large boulder, or by filter pack materials during well completion. Bridging can also occur in the formation during well development.

3.4 GROUT

Grout is a fluid mixture of cement and water that can be forced through a pipe and emplaced in the annular space between the borehole and casing to form an impermeable seal. Various additives, such as sand, bentonite, and polymers, may be included in the mixture to meet certain requirements.

3.5 Sieve Analysis

Sieve analysis is the evaluation of the particle-size distribution of a soil, sediment, or rock by measuring the percentage of the particles that will pass through standard sieves of various sizes.

4. Responsibilities

CTO Managers are responsible for issuing WPs that reflect the procedures and specifications presented in this procedure. Individual municipalities, county agencies, and, possibly, state regulatory agencies enforce regulations that may include well construction and installation requirements. The CTO Manager shall be familiar with current local and state regulations, and ensure that these regulations are followed. Regulations are subject to constant revision. Every effort should be made to stay informed of these changes through contact with the agencies that oversee work in specific project areas, prior to initiation of field activities. The CTO Manager or designee shall review all well construction logs on a minimum monthly basis. The CTO Manager is responsible for ensuring that all personnel involved in monitoring well installation and abandonment have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager (FM) is responsible for direct supervision of the installation of monitoring wells and ensuring that procedures and specifications are implemented in the field. The qualifications for the FM include a degree in geology, hydrogeology, civil/geotechnical/environmental engineering, or equivalent with at least 2 years of field experience in the installation of monitoring wells.

Field sampling personnel are responsible for the implementation of this procedure.

The onsite geologist/hydrogeologist/engineer is expected to obtain a description of the lithologic samples obtained during the excavation and construction of a monitoring well. These data are often required to provide guidance regarding the installation of specific components of the monitoring well. Guidance for lithologic sample collection and sample description is contained within Procedure I-B-1, *Soil Sampling.*

5. Procedures

5.1 Considerations For Munitions and Explosives of Concern

Potential Munitions and Explosives of Concern (MEC) hazards may be encountered in any area formerly or currently occupied or used by the Department of Defense (DoD). MEC hazards may occur on the ground surface, in the subsurface, and within bodies of water, and may not always be readily observable, or identifiable. As a result, whether or not munitions-related activities ever occurred on the specific work area or within waters in which Navy operations/activities will take place, special care should always be taken when conducting field operations, especially intrusive activities, in the event that MEC may be encountered.

If the site is currently recognized as belonging in the Military Munitions Response Program and has a current, Naval Ordnance Safety and Security-accepted, site-specific Explosives Safety Submission

(ESS) (per DON 2010), then field activities, especially intrusive activities, shall adhere to the safety procedures outlined within the ESS.

If suspected MEC is encountered on an active DoD installation, immediately notify your supervisor, DoD Point of Contact, and installation Point of Contact, who will contact and facilitate military Explosive Ordnance Disposal response.

5.2 Background Information

The primary objectives of installing a monitoring well at a site are: to observe groundwater levels and flow conditions; to obtain samples for determining groundwater quality; and to evaluate the hydraulic properties of water-bearing strata. To achieve these objectives, it is necessary to satisfy the following criteria:

- Construct the well with minimum disturbance to the formation.
- Construct the well with materials that are compatible with the anticipated geochemical environment.
- Properly complete the well in the desired zone.
- Adequately seal the well with materials that will not interfere with the collection of representative water samples.
- Sufficiently develop the well to remove drilling fluids or other additives or conditions associated with drilling, and provide unobstructed flow to the well.

The proper design and construction of monitoring wells requires an understanding of site geology and hydrogeology, and knowledge of contaminant transport in subsurface materials.

A significant difference between monitoring wells and production or “water” wells is that the intake section of monitoring wells is often purposely completed in a zone of poor water quality and/or poor yield. The quality of water entering a monitoring well can vary from drinking water to a hazardous waste or leachate. In contrast, production wells are normally designed to efficiently obtain water from highly productive zones containing good quality water. The screen of a monitoring well often extends only a short length (typically 10 feet or less) to monitor hydraulic conditions within, and obtain water samples from, selected water-bearing intervals. In contrast, water wells are often designed to obtain economic quantities of water from multiple zones of water-bearing strata.

5.3 Monitoring Well Design Considerations

The following information was compiled from a number of technical references. For additional information related to monitoring well installation, consult the references listed in Section 8.

5.3.1 Well Placement

Select the location of a monitoring well according to the purpose of the monitoring program, which will vary among different sites and may include detection of contaminants in groundwater, verification of contaminant migration predictions, the monitoring of leachate at a landfill site, or remediation of a contaminated site. Each of these purposes will require a specialized array of monitoring locations and completion intervals, and a specific sampling program. Therefore, design the monitoring well network to satisfy the needs of the particular situation.

Determine the position of a monitoring well in a contaminant flow path for a monitoring effort based on the interpretation of preliminary data. These data shall be sufficient to facilitate identification of potential contaminant sources. Also consider site history, topography, climate, surface hydrology, and the location of nearby pumping wells.

Design the layout of the groundwater monitoring network following preliminary evaluation of the approximate direction of groundwater flow. A minimum of three wells is necessary to estimate local hydraulic gradients. Ideally, at least one well will be located hydraulically upgradient, and two or more wells strategically located hydraulically downgradient of each potential contaminant source. Determination of the horizontal and vertical extent of a contaminant plume is often an iterative process requiring the installation and sampling of wells in several phases.

Install monitoring wells hydraulically downgradient and as close as physically possible to the areas of suspected contamination in order to immediately detect releases from a hazardous waste site. Locate additional monitoring wells based on the interception of potential groundwater flow paths and direction of contaminant migration.

The placement of groundwater monitoring wells shall also consider the three-dimensional nature of groundwater flow. Significant vertical gradients and heterogeneous and/or anisotropic hydraulic conditions may exist at a site. Thus, the direction of groundwater flow may not necessarily coincide with the apparent horizontal gradient observed by the triangulation provided by three monitoring wells. Determine the completion intervals of existing wells prior to the calculation of groundwater gradient directions. Consider temporal/seasonal groundwater flow conditions if the monitoring well network is located near existing active well fields, near tidal zones, or near ephemeral surface water (e.g., canals, dry river beds).

5.3.2 Well Depth and Screened Interval

A detailed understanding of the site stratigraphy, including both horizontal and vertical extent of geologic formations, is necessary to identify zones of different permeabilities, and discontinuities, such as bedding planes, fractures, or solution channels. Groundwater flow and/or contaminant transport beneath the site preferentially occur in the more permeable zones. Equally important is the identification of relatively low permeability zones that may impede migration of contaminants. The occurrence and movement of groundwater in the subsurface is closely related to lithology. Thus, geologic conditions will influence the location, design, and methods used to locate and install monitoring wells.

The depth of a monitoring well is determined by the depth of one or more water-bearing zones that are to be monitored. For example, if preliminary soil borings indicate that multiple water-bearing zones are present at a site, and it is believed that zones other than the uppermost zone may be impacted by surface contamination, a well should be completed in each individual water-bearing zone encountered. Where two or more saturated zones occur beneath a site, and the intent of the monitoring program is to monitor water quality in the lower zone, the monitoring well will generally require surface casing to isolate the upper water-bearing zone from the deeper zone prior to drilling into the deeper zone.

In multiple aquifer systems, highly variable conditions may occur. For example, an overlying unconfined aquifer may be contaminated, whereas the underlying confined aquifer may not contain contaminants. Exercise extreme care to ensure that the installation/completion of monitoring wells does not cause cross-contamination of the aquifers. In these cases, it may be preferable to install surface casing through the contaminated aquifer to minimize the possibility of cross-contamination to the lower aquifer system.

Characteristics of lithologic materials encountered at the site, such as the degree of consolidation and grain size, also influence the type of well completion. In unconsolidated alluvial deposits, screened well intakes are typically used. An emplaced filter pack, consisting of well-sorted, clean, inert silica sand with a grain size and well screen slot size appropriate for the formation, typically is used to filter out fine-grained materials present within formations encountered in the borehole. Where permeable, consolidated formations are present, casing may be extended through overlying unconsolidated deposits and the well may be completed with a section of open borehole in the consolidated water-bearing zone. Even in these cases, however, fine-grained materials may enter the well through fractures, and if severe enough, an artificial filter pack and screened intake may be required. Also, many regulatory agencies require a screened interval installed with filter pack for all well completions.

Placement of the screened interval depends primarily on two factors: the interval to be monitored and the type of contaminants. The desired interval to be monitored shall dictate the interval to be screened. Determine which stratigraphic horizons represent potential pathways for contaminant migration by the site characterization. Short screened sections provide more specific data on the vertical distribution of contaminants and hydraulic head, while long screen intervals can result in a cumulative dilution of contamination in one zone with uncontaminated groundwater in another zone, as well as less specific information on hydraulic head. In addition, a long screened interval could potentially create vertical conduits that might result in cross-contamination.

Consider the type of contaminants involved prior to well installation. Contaminants that have a density less than water migrate differently than contaminants with a density equal to or greater than water. For example, if the contaminant in an unconfined aquifer has a density lower than water, such as diesel or gasoline, it is important to ensure that the screened interval of the well extends above the maximum seasonal elevation of the water table. Doing so facilitates an accurate determination of apparent thickness of free product in a monitoring well. In general, the screen shall extend 3 to 5 feet above the highest anticipated level of the water table when monitoring the upper portions of an unconfined aquifer.

Conversely, if the contaminant of concern has a density higher than water, such as trichloroethene (TCE), the screened interval of one or more monitoring wells should be installed just above the lower confining bed of a potentially impacted aquifer. TCE may be transported at high concentrations as a dense, nonaqueous phase liquid (DNAPL) near the source area, and migrate along the top of a confining bed at the base of an impacted aquifer.

Give special attention to interpretation of site stratigraphy when assessing DNAPL, particularly with respect to dipping beds, as it is possible for DNAPLs to effectively move hydraulically upgradient if low permeability perching horizons dip in a direction opposite the hydraulic gradient. This type of situation is important to consider when selecting monitoring well locations.

If time and budget allow, correlate conventional borehole geophysical methods and continuous cores of soil samples to yield a more complete stratigraphic characterization. A continuous profile of borehole conditions is compared to field observations and is used to select screened intervals.

5.3.3 Well Permitting

All wells shall be permitted in accordance with the regulations of the jurisdiction where well installation is occurring, if this is Navy policy for the region of activity. Contact local authorities prior to establishing well construction requirements for the project.

The permit procedure may require permit fees, site inspections, and an application signed by a registered professional geologist or engineer. Permit requirements may impact field schedules and budgets. The driller may also be required by law to be licensed and bonded. Provide documentation that all legal requirements have been met to the appropriate agencies prior to the installation of a monitoring well.

5.4 Selection of Drilling Method

Monitoring well installation at hazardous waste sites may involve drilling through or near hazardous materials, in areas where the extent of contamination is unknown, or through more than one geologic material or aquifer. Use of any drilling method at a hazardous waste site involves an element of risk related to the potential spread of contamination or creation of a pathway through which contaminants can migrate. Selection of a method most appropriate for site-specific conditions is essential to minimize these risks. Table I-C-1-1 provides an interpretation of how geologic conditions may influence the selection of a particular drilling method.

Most drill rigs use gasoline or diesel fuel, as well as hydraulic fluid during operation. Because these fluids are all potential contaminants, it is important to protect the drill hole and immediate area from these substances. Whenever leaking fluid from the drill rig is detected, drilling operations shall cease as soon as practical following stabilization of the drill stem, and the rig shall be moved to a safe area to be repaired.

Table I-C-1-1: Relative Performance of Different Drilling Methods in Various Types of Geologic Formations; Commonly Utilized Drilling Methods

Type of Formation	Auger-Hollow Stem	Rotary Bucket Auger*	Rotary with Fluids (foam, mud)*	Air Rotary	Air Rotary with Casing Hammer	Down the Hole Air Hammer	Dual Tube/ Casing Hammer	Coring	Reverse Rotary with Fluids*	Reverse Rotary with Dual Tube	Direct Push **
Loose sand and gravel	G	P	P-G	NR	E	NR	E	NR	P-E	E	E
Loose boulders in alluvium	P	P-G	G	NR	E	NR	P	NR	P	G	NR
Clay, silt	E	G	E	NR	E	NR	E	P-G	E	E	G
Shale	P	NR	E	P	E	NR	NR	E	E	E	NR
Sandstone	P	NR	G	E	NR	NR	NR	E	G	E	P
Limestone with chert	NR	NR	G	E	NR	E	NR	E	G	G	NR
Limestone with and without fractures	NR	NR	G-E	E	NR	E	NR	E	P-E	E	P
Limestone, cavernous	NR	NR	P-G	P-G	NR	E	NR	E	NR	E	NR

Type of Formation	Auger-Hollow Stem	Rotary Bucket Auger*	Rotary with Fluids (foam, mud)*	Air Rotary	Air Rotary with Casing Hammer	Down the Hole Air Hammer	Dual Tube/ Casing Hammer	Coring	Reverse Rotary with Fluids*	Reverse Rotary with Dual Tube	Direct Push **
Dolomite	NR	NR	E	E	NR	E	NR	E	E	E	NR
Basalts-thin layers in sedimentary rocks	P	NR	G	E	NR	NR	NR	E	G	E	P
Tuff	P	NR	G	E	NR	E	NR	E	G	G	NR
Basalts-thick layers	NR	NR	P	G	NR	E	NR	E	G	G	NR
Basalts-highly fractured	NR	NR	NR	P	NR	G	NR	E	NR	G	NR
Metamorphic rocks	NR	NR	NR-P	G	NR	E	NR	E	G	G	NR
Granite	NR	NR	NR-P	E	NR	E	NR	E	G	G	NR

E Excellent
G Good
NR Not Recommended
P Poor
* Cannot be used for analytical soil sampling
** Procedure I-H, *Direct-Push Sampling Techniques* discusses protocol associated with direct push applications.

The following sections discuss commonly used drilling methods and their applicability to installation of monitoring wells. Regardless of the drilling method selected, decontaminate all drilling equipment using Procedure I-F, *Equipment Decontamination*. Follow these procedures before use and between borehole locations to prevent cross-contamination. In addition to selecting the proper drilling technique, take other precautions to prevent distribution of any existing contaminants throughout the borehole.

5.4.1 Hollow-stem Continuous-flight Auger

Hollow-stem continuous-flight auger (HSA) is the most frequently employed method used in the environmental industry for the drilling and installation of shallow monitoring wells in unconsolidated materials. Drilling with HSA is possible in loose sand and gravel, loose boulders in alluvium, clay, silt, shale, and sandstone. HSA drilling is usually limited to unconsolidated materials and depths of approximately 150 to 200 feet. HSA drill rigs are mobile, relatively inexpensive to operate, generally cause minimal disturbance to the subsurface materials, and have the additional advantage of not introducing drilling fluids (e.g., air, mud, or foam) to the formation.

Another advantage of the HSA method is that undisturbed samples are obtained by driving a split-spoon sampler below the lead auger. Soil samples can usually be easily collected in this manner with a minimum of tripping sampling tools into and out of the hole.

Moreover, in the HSA drilling method, the well is constructed inside the HSAs as the augers are gradually removed from the ground. This method decreases the possibility of the borehole collapsing before the well is installed. HSAs shall have a nominal outside auger-flight diameter of 10 to 12 inches and a minimum inside diameter of 8 inches. Larger inside diameter auger flights are sometimes available. Well casing diameter is usually limited to 4 inches or less when using the HSA method. The difference between the inner diameter (I.D.) of the auger and the outer diameter (O.D.) of the well casing shall be at least 4 inches (i.e., a minimum 2-inch annular space) to permit effective placement of filter pack, bentonite seal, and grout without bridging.

5.4.2 Rotary Bucket Auger

Rotary bucket auger drilling, or bucket auger drilling (BAD), utilizes a large-diameter bucket auger to excavate earth materials. Excavated material is collected in a cylindrical bucket that has auger-type cutting blades on the bottom of the bucket. The bucket is attached to the lower end of a kelly bar that passes through, and is rotated by, a large ring gear that serves as a rotary table.

The kelly bar is square in cross-section and consists of two or more lengths of square steel tubing, with each successive length of tubing telescoped inside the previous length. This design permits boring to a depth several times the collapsed length of the kelly bar before having to add a length of drill rod between the kelly and the bucket. In drilling with the telescoping kelly, the bucket is typically lifted and dumped without disconnecting, thereby speeding up the process when drilling deep holes. Depths of 75 to 100 feet are achievable with most telescoping kellys. It is possible to construct wells more than 250 feet deep by this method, although depths of 50 to 150 feet are more typical.

The BAD technique is most effective in semi-consolidated or clayey formations that stand open without caving. Drilling through unconsolidated materials within the saturated zone is difficult, but not impossible if the hole is kept full of water or mud (see direct rotary methods with foam or mud). Drilling mud may be necessary, particularly in loose formations consisting of unconsolidated fine- to medium-grained sands and silts. In the right conditions, a bucket auger bit will remove a cylinder of material 12 to 24 inches deep with each run. Therefore, samples obtained by the BAD method are representative of the formation being drilled, unless sloughing or caving of the borehole walls occurs.

Boreholes drilled with the BAD technique generally range from 18 to 48 inches in diameter. Because of the large diameter of the borehole drilled with this technique, and the common need to add either water or mud to maintain the borehole in unconsolidated, near-surface deposits, it is recommended to use this method only for the installation of surface casing through the first water-bearing unit at a hazardous waste site.

5.4.3 Direct Rotary with Foam or Mud

Direct rotary drilling (DRD) techniques involve the use of various types of drilling fluids, which typically include air, foam, and mud. In each of the DRD methods, drilling fluids are circulated down through the inside of the drilling pipe into the borehole, and then up through the annulus between the drilling pipe and the borehole wall to carry drill cuttings up to the surface. The drilling fluids may also be used for stabilizing the borehole wall, which may be especially useful in unconsolidated, caving formations. In this section, the DRD method and its use with either foam or mud are discussed.

A variety of bit types may be used with each of these drilling fluids, depending on the type of formational material encountered; however, typically, the tri-cone or roller bit is used. The drilling bit is attached directly to a heavy section of drill pipe called a drill collar, which is attached to help keep the borehole straight. The drill collar is in turn attached to the drill pipe and the kelly.

General types of drilling fluids available for use with the DRD method include water with clay additives, water with polymeric additives, water with clay and polymeric additives, and foams (comprised of air or water, surfactants, and occasionally clays or polymers). The drilling fluid density may be adjusted during drilling to improve or resume circulation within the borehole, or to attempt to stabilize the borehole wall. A major problem with the addition of these fluids is that it is almost impossible to estimate the amount introduced into the formation through the saturated and unsaturated zones. Additionally, it is also very difficult to estimate the magnitude and duration of the impact to groundwater quality by the use of these fluids.

The drilling fluids and associated cuttings shall not be allowed to flow over the site unrestricted. A downhole circulation system, or fluid diversion system shall be used to keep the fluids and cuttings contained in a reasonable manner, yet still allow the collection of grab samples for lithologic identification.

While in some geologic situations DRD may be the most efficient method of drilling a borehole, potential problems associated with the drilling fluids usually make DRD a last-resort drilling technique for environmental purposes; one that should be avoided whenever possible.

Potential Problems of DRD with Foam or Mud

- The chemistry of the drilling fluid could adversely affect the chemistry of groundwater samples, soil samples, or the efficiency of the well (when using mud).
- Bentonite mud reduces the effective porosity of the formation around the well, thereby compromising the estimates of well recovery. Bentonite may also affect groundwater pH. Additives to adjust viscosity and density may introduce contaminants to the system or force irrecoverable quantities of mud into the formation.
- Some organic polymers and compounds provide an environment for bacterial growth, which in turn, reduces the reliability of sampling results.
- Uncontained drilling foam and/or mud may create unsafe working conditions at the surface around the rig.

Solutions

- DRD should only be utilized as a last resort.
- The hydrogeologist should ensure that the fluids used will not affect the chemistry of the soil samples and groundwater samples. One possibility is to collect samples of the drilling fluid for laboratory analysis.
- The hydrogeologist shall keep track of the amount of water and fluids introduced to the borehole in order to purge this quantity during well development.
- Provisions to contain drilling mud and foam shall be discussed in the drilling contractor scope of work.

5.4.4 Air Rotary and Air Rotary with Casing Hammer

Air rotary drilling (ARD) and air rotary with casing hammer (ARCH) force air down the drill pipe and back up the borehole and remove drill cuttings in the same manner as DRD with foam or mud. Without a casing hammer, the use of ARD techniques is best suited to hard-rock formations where the borehole will stand open on its own and circulation loss is not a major concern. ARCH is most useful in unconsolidated sediments of all types due to the use of a hardened steel casing that is driven behind the bit with a pneumatic casing hammer to keep the hole open. A combination of these two drilling techniques is very useful where unconsolidated overburden overlies consolidated rock. In this case, the casing hammer attachment would be used to set the surface casing at the top of the consolidated formation while continuing with ARD. As a well is being installed or the hole is being abandoned, the casing can be retrieved for use on another hole, or left in place to serve as surface casing.

Air from the compressor shall be filtered to ensure that oil or hydraulic fluid is not introduced into the soils and/or groundwater system to be monitored. In addition, foam or hydrocarbon-based lubricating joint compounds for the drill rods shall not be used with any rotary drilling method due to the potential for introduction of contaminants into the native materials and/or groundwater. Teflon-based joint lubricating compounds that are typically mixed with vegetable oil are available for this purpose.

Potential Problems of ARD and ARCH

- In the case of sampling with a split-spoon sampler to collect soil samples for laboratory analysis, the high-pressure air from inside the drill pipe can cause volatilization of contaminants from the soils beneath the bit in unconsolidated sediments. If installing deep wells or boreholes, this problem may not be avoidable.
- Fine-grained saturated materials that may cause surging and heaving problems are common in many coastal areas. Heaving sediments may cause problems during sampling and well installation when drilling with ARD.
- Rocks and other drill cuttings may be ejected from the borehole at high velocities, creating a secondary hazard around the rig.

Solutions

- ARD and ARCH should not be used for soil sampling in shallow, unconsolidated situations where a HSA rig could be used as effectively.
- One method to compensate for heaving and surging aquifer materials is to over drill the borehole by 5 or 10 feet to provide space for heaving sediments to fill in while well completion is being performed.
- Another method to control heaving sands is to add clean water to a level above the water table to create a downward pressure on the heaving materials. This additional volume of water should also be extracted during well development.
- Drill rigs shall be equipped with cyclones or equivalent devices designed to contain formation projectiles.

5.4.5 Dual Tube Casing Hammer with Reverse Air Circulation

Dual tube casing hammer with reverse air circulation (DTCH) is useful in unconsolidated sediments, but is most effective as a method for drilling through thick sequences of materials, such as coarse-grained sands and gravels. The DTCH system operates by simultaneously driving a pair of heavy gauge steel pipes into the ground while using high pressure reverse air circulation to blow air down the annulus of the two pipes and bring air and unconsolidated lithologic materials out through the inside of the inner pipe. The method does not employ a typical bit in that the formational materials are not ground up, sliced, nor cut into pieces. Instead, the bit consists of a special shoe that is used to funnel materials either into, or away from, the inner pipe, depending on whether the formational material is fine- or coarse-grained, respectively.

Typically, the method can drill through 200 feet of gravel in a day with relative ease. The inside diameter of the inner pipe is about 6 inches, with the borehole diameter being about 10 inches. Cobbles with long axes of up to 6 inches come up through the inner pipe easily. Larger conglomerate clasts must be either pushed aside or broken up using the pneumatic hammer to drive the heavy shoe down onto the clast.

Conversely, the method works poorly in clay-rich materials. The shoe acts as a large cookie cutter, forcing a plug of clay into the inner pipe, which then must be forced to the surface and physically removed from the diverter/shoe assembly with the hammer. This method should probably be avoided where large thicknesses of clay are expected to be encountered in the subsurface.

Typically, the DTCH method can drill to approximately 200 feet with standard equipment. Deeper holes will likely require a larger air volume for circulation via an additional compressor hooked up to the drilling rig. Additionally, a variation of the DTCH called "triple tube" can be used to install larger-diameter wells to depths of about 200 feet depending upon the site. This method can also be used to supply a temporary surface casing to avoid cross-contamination of deeper zones while extending the boring to greater depths.

Potential Problems of DTCH

- In the case of soil sampling with a split-spoon sampler to collect samples for laboratory analysis, the high-pressure air from inside the drill pipe can cause volatilization of contaminants from the soils beneath the bit in unconsolidated sediments. If installing deep wells or boreholes, this problem may not be avoidable.

Solutions

- DTCH should not be used for sampling soil in shallow, unconsolidated situations where a HSA rig could be used as effectively.

5.5 MONITORING WELL DESIGN PROCEDURES

The designs of typical groundwater monitoring wells are depicted in Figure I-C-1-1 and Figure I-C-1-2. A discussion of the design of the individual components of a typical monitoring well is given in the following subsections.

5.5.1 Pre-installation Design Drawing

Develop a pre-installation design drawing after the borehole for the well has been completed and well-specific lithologic and hydrologic information are available. The pre-design drawing shall identify the anticipated depth of the well, the locations of the top and bottom of the screened interval, the anticipated top of the filter pack, the anticipated top of the bentonite seal, and the locations of centralizers (if applicable). In addition, calculate the volumes of sand, bentonite, and grout anticipated to be placed in the annular space of the well. Maintain the drawing as documentation of the well design.

5.5.2 Casing Selection

The cased section of a monitoring well is a pipe without slots or openings, which is installed to prevent the well from directly accessing formations above the screened interval. The casing isolates the screened interval.

The selection of appropriate casing materials must take into account several site-specific factors, such as: (1) geology, (2) geochemistry, (3) well depth, (4) size and type of equipment to be used in the well, and (5) the types and concentrations of suspected contaminants. In addition, consider several other logistical factors, including drilling method, cost, and availability.

Typical casing materials comprise polyvinyl chloride (PVC), chlorinated PVC, fiberglass reinforced plastic, Teflon, galvanized steel, carbon steel, Type 304 stainless steel, and Type 316 stainless steel. Casing materials must be compatible with the environment into which they will be placed. Metallic casings are most subject to corrosion, while thermoplastic casings are most subject to chemical degradation. Some thermoplastic materials are susceptible to sorption and desorption of chemicals. The extent to which these processes occur is related to water quality, the concentration of contaminants, and the type of casing materials. Choose casing material with knowledge of the existing or anticipated groundwater chemistry. If non-aqueous phase liquids (light non-aqueous-phase liquid or DNAPL) are potentially present at a site, careful consideration of the concentrations and types of chemicals that may come into contact with the casing must be made to insure the casing will not degrade over time. Table I-C-1-2 presents the relative compatibilities of some typical casing materials.Table I-C-1-2: Relative Chemical Compatibility of Rigid Well-Casing Material

	PVC [a] 1	Galvanized Steel	Carbon Steel	Low-Carbon Steel	Stainless [b] Steel 304	Stainless [b] Steel 316	Teflon [c]
Buffered weak acid	100	56	51	59	97	100	100
Weak acid	98	59	43	47	96	100	100
Mineral acid/high solids	100	48	57	60	80	82	100
Aqueous/organic mixtures	64	69	73	73	98	100	100
Percent overall rating [d]	91	58	56	59	93	96	100

[a] PVC casing shall not be installed in a groundwater environment containing chlorinated solvent or other destructive contaminants where the concentration of organics is greater than 1 part per million, and where the desired detection limit is less than 25 part per billion.
[b] Type 316 stainless steel screen and/or casing shall be used rather than type 304 when conditions are unknown and the lifespan of the monitoring well is to be greater than 5 years, or where the pH (indicates the hydrogen ion concentration – acidity or basicity) is less than 4.5, or where chloride concentration is greater than 1,000 part per million.
[c] Trademark of E.I. DuPont de Nemours
[d] Overall rating based on scale of 0 to 100 with 0 being the least compatible and 100 being the most compatible.

Besides chemical compatibility, a second consideration for specification of casing materials is the depth of the monitoring well. Well installations greater than 150 feet deep require casing materials of greater structural strength. In the case of PVC casing, Schedule 80 PVC rather than Schedule 40 may be required to prevent over-stressing of the casing couplings. The build-up of heat during grout setup might adversely affect some thermo-plastic materials.

Regardless of the type of casing materials, use only flush-threaded couplings. Flush-threaded couplings ensure that no screws, mechanical adapters, glues, or solvents are necessary to join individual sections. Steel conductor casing shall be welded at the joints, and the joint shall be at least as thick as the thickness of the casing wall. The weld shall be fully penetrating and shall meet the standards of the American Welding Society. Outside steel collars may be used to increase the strength of the welded joint. Do not use Teflon tape on PVC or stainless steel casing joints because it reduces the tensile strength of the joints.

The selection of an appropriate casing diameter is also important. The I.D. shall be 4 inches or greater to allow better access to the well and more rigorous well development than is commonly possible with smaller-diameter wells. Wells with casing smaller than 4-inch I.D. shall only be installed with the approval of the QA Manager or Technical Director. Wells greater than 150 feet in depth may require diameters larger than 4 inches to ensure that development and sampling equipment can be moved easily through the well. In addition, wells designed for groundwater extraction shall have a casing diameter large enough to accommodate a pump capable of achieving the appropriate pumping rate. The borehole in which the well is to be installed shall be a minimum of 4 inches larger in diameter than the O.D. of the well casing.

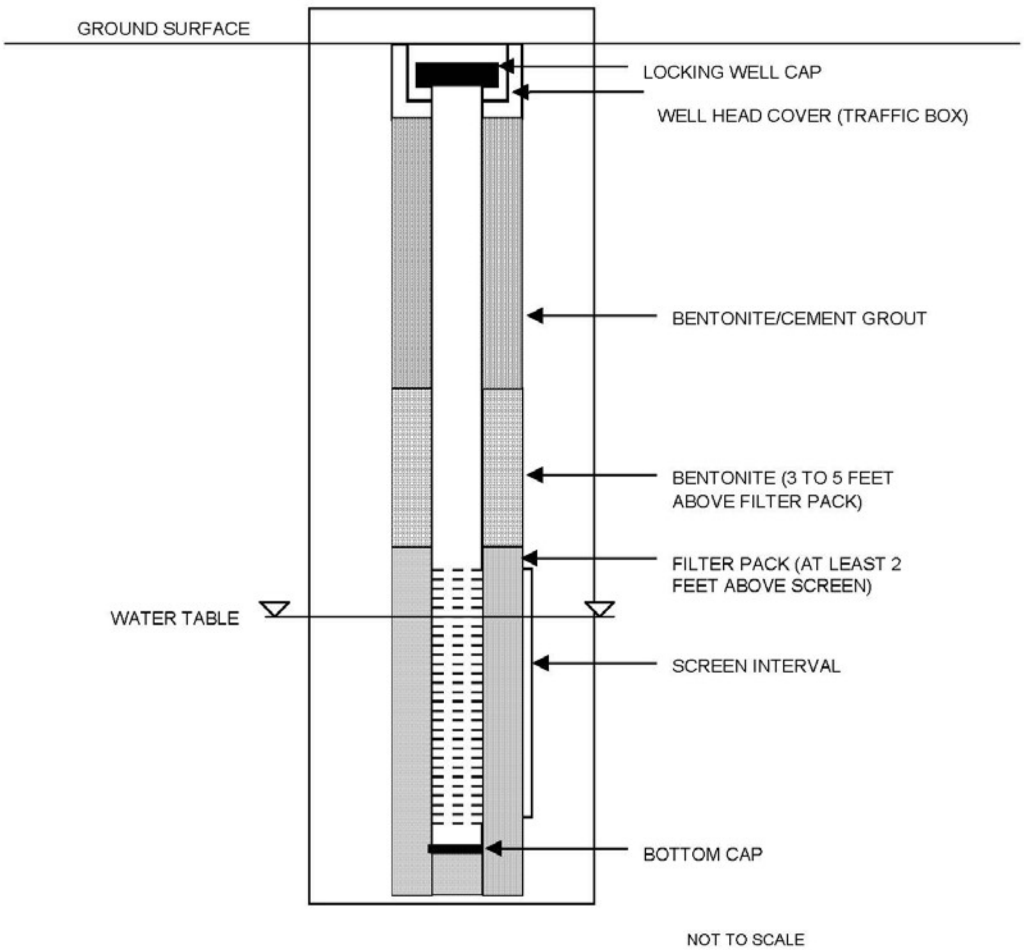


Figure I-C-1-1: General Cross Section of Monitoring Well, Unconfined Water Bearing Zone

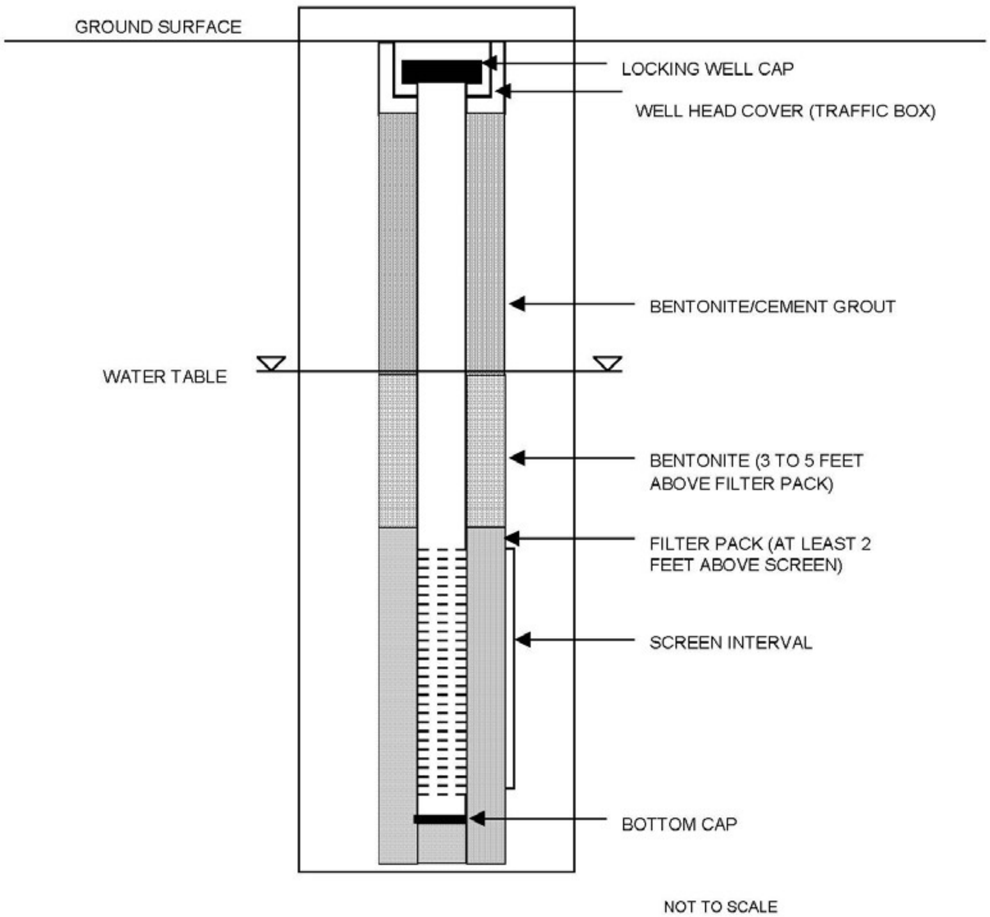


Figure I-C-1-2: General Cross Section of Monitoring Well, Confined Water Bearing Zone

5.5.3 Well Screen Selection

The screened section of the monitoring well allows groundwater to flow freely into the well, while retarding movement of fine-grained lithologic materials into the well. When designing a well screen, consider important factors, such as type of well screen material, length of the screened section, location of the screened section, the intake opening (slot) size, the type of intake opening, and size of filter pack to be utilized.

Five factors directly affect the performance of the monitoring well and are evaluated in the selection of an appropriate screen: (1) chemical resistance/interference, (2) screen length, (3) screen placement, (4) intended use of well (e.g., long-term groundwater extracted); and (5) intake opening size.

Selection of a screen material that provides chemical resistance and minimizes interference follows the same basic procedures as the selection of an appropriate casing material (see Table I-C-1-2). Some typical screen materials consist of PVC, Teflon, Type 304 stainless steel, and Type 316 stainless steel. Again, use only flush-threaded couplings. Screen sections constructed of different metals in the same well may cause electrochemical reactions that could rapidly degrade the casing or screen; therefore, do not use this type of composite well construction. In addition, construct wells intended for long-term groundwater extraction with well screen rather than slotted casing for facilitating redevelopment.

Selection of the screen length depends on its primary use(s). Most monitoring wells function as both groundwater sampling points and piezometers. Shorter-screened sections provide more specific data on vertically distributed contaminants, hydraulic head, and flow, and are generally preferred to longer-screened lengths. Saturated sections in groundwater monitoring wells shall be limited to between 5 and 10 feet in length; however, longer intervals may be justified in certain circumstances with approval of the QA Manager or Technical Director.

Placement of the screened interval within a groundwater monitoring well depends primarily upon two factors: the discrete interval and the type of contaminants to be monitored. The location of the discrete interval to be monitored will dictate the location of the screened interval within a monitoring well; however, also consider the characteristics of the contaminants to be monitored (i.e., light, non-aqueous phase liquid; dense, non-aqueous phase liquid) when choosing placement of the screened interval.

An additional consideration in the design of the screened section of the well is the hydraulic characteristics of the water-bearing zone that is to be monitored (i.e., confined or unconfined). If an unconfined zone is being monitored for contaminants that are less dense than water (e.g., gasoline, diesel, waste oil), place 3 to 5 feet of screened interval above the highest level of the water table to allow for evaluation of fluctuations in water level and to ensure that contaminant phases less dense than water can be observed. Conversely, if an unconfined zone is being monitored for contaminants that are denser than water (e.g., chlorinated solvents), place approximately 5 feet of screened interval (maximum) just above the confining unit at the base of the water-bearing zone to facilitate detection of the dense-phase contaminants. In the case of a confined water-bearing zone, use a maximum-screened interval of approximately 5 feet.

Selection of an appropriate intake opening size is critical to the performance of the monitoring well and to the integrity of groundwater samples obtained from the well. The size of the intake openings can only be determined following the selection of an appropriate filter pack, which itself is selected based upon the grain-size of the formation. An intake size is generally designed to hold back between 85 to 100 percent of the filter pack material. Figure I-C-1-3 can be used to select appropriate intake opening sizes. The screen slots shall be factory-made (or formed).

5.5.4 Filter Pack Design

Filter pack material shall be clean and chemically stable within the monitoring well environment to minimize addition to, or sorption from, the groundwater. Filter pack shall meet the following minimum specifications:

- Filter pack material shall be at least 95 percent silica, consisting of hard, durable grains that have been washed until free of dust and contamination, and graded.
- Filter pack material shall not be angular and non-uniform such that it will bridge in the annular space, leaving a void or poorly packed materials that can consolidate or settle after construction.
- Select filter pack to meet the grading specification determined from sieve analysis of the geologic formation to be screened, if available.
- Filter pack material shall be commercially packaged in bags that prevent the entrance of contaminants, and allow proper handling, delivery, and storage at the monitoring well site. Do not use material delivered in broken bags for monitoring well construction.

In investigations where there are limited data on site conditions prior to monitoring well installation, select the filter pack size prior to field activities based on available lithologic data. Use finer filter pack sizes if fine-grained formations are anticipated to be present, and use coarser-grained filter packs in coarser lithologies and consolidated formations.

In investigations where sieve analysis data exist for a site prior to field activities, base selection of a proper filter pack upon the grain size of the formation materials to be monitored. Use the sieve data for the finest lithology identified in the interval to be monitored for establishing filter pack size. The U.S. Environmental Protection Agency recommends that filter pack grain size be selected by multiplying the 70 percent retained grain size of the formation materials by a factor between 4 and 6. Use a factor of 4 if the formation materials are fine-grained and uniform, and use a factor of 6 if the formation materials are coarse-grained and non-uniform. In any case, the actual filter pack used should fall within the area defined by these two curves. An example of this technique is presented in Figure I-C-1-4.

5.5.5 Annular Seal

The annular seal is placed directly above the filter pack in the annulus between the borehole and the well casing. The annular space must be sealed to prevent the migration of water and contaminants through the annulus. The annular seal is also intended to hydraulically and chemically isolate discrete water-bearing zones.

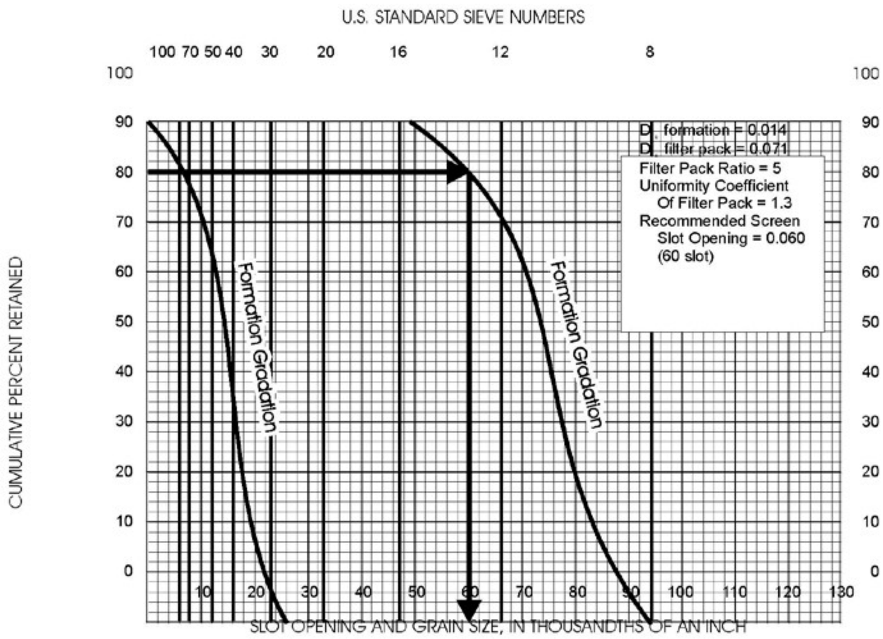


Figure I-C-1-3: Selecting Well Intake Slot Size Based on Filter Pack Grain Size

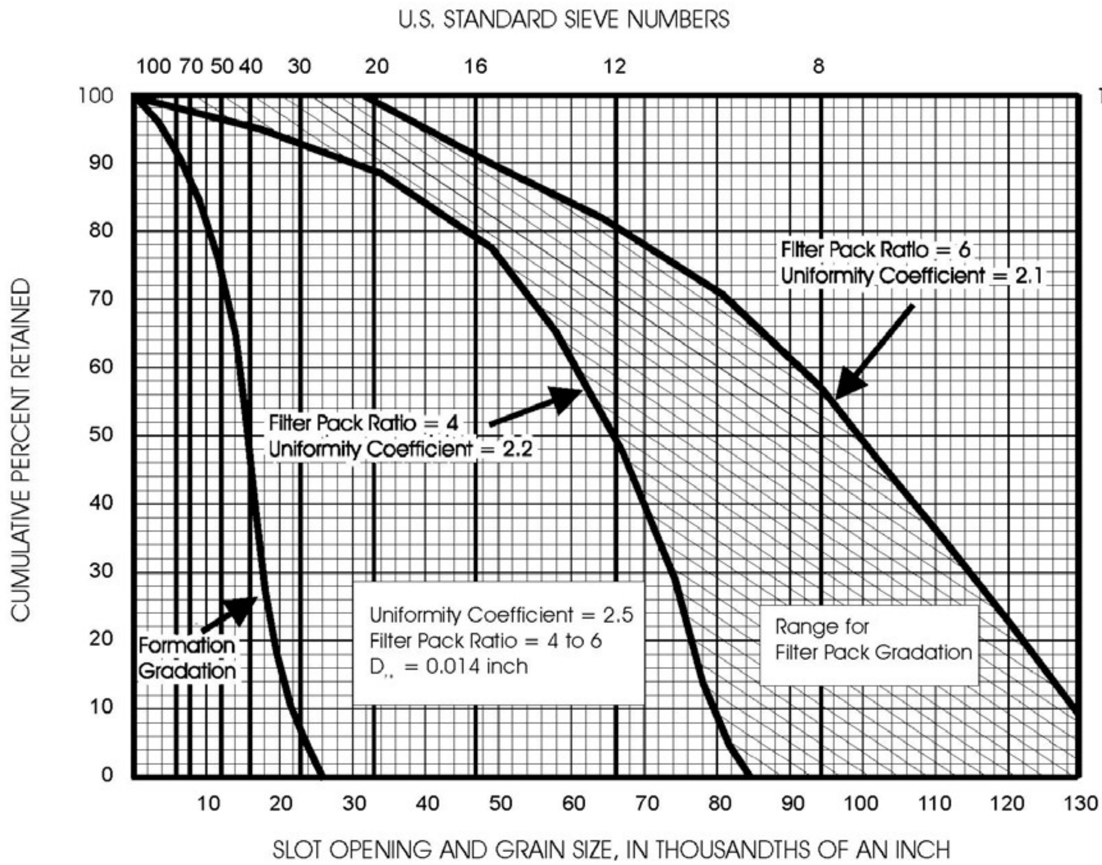


Figure I-C-1-4: Filter Pack Design Criteria

Typically, annular seals consist of two discrete sections. The first section, known as the bentonite seal, consists of a pure sodium bentonite seal. To be effective, the bentonite seal should be emplaced directly over the top of the filter pack and extend approximately 3 to 5 feet (no less than 3 feet thick). Typical materials for the seal consist of granular sodium bentonite, or sodium bentonite pellets or chips.

The second section of the annular seal typically contains grout slurry, which completely fills the remaining annular space from the bentonite seal to just below the ground surface. Grout consists of either sodium bentonite and Portland cement slurry or neat cement slurry. Give special consideration to the selection of annular seal material for wells installed in coastal areas where groundwater may contain elevated concentrations of sulfates. In this situation, use a sulfate resistant grout to prolong the usefulness of the well.

5.5.6 Surface Completion

The surface of the well shall be completed using either an above-grade (monument) style, or a flush-to-grade (traffic box) style. In either case, the protection of the wellhead at land surface is accomplished by means of a surface seal of concrete and a metal completion box surrounding the well casing. The surface seal serves to prevent infiltration of surface water and unauthorized entry, and where necessary, to provide protection from vehicular traffic.

5.6 MONITORING WELL INSTALLATION TECHNIQUES

The following general procedures describe the installation of groundwater monitoring wells.

5.6.1 General Casing and Screen Installation Techniques

Following completion of the borehole, the FM or designate will first measure the total depth of the hole to ensure that the desired depth has been attained. The lengths of casing and screen shall also be measured. These measurements shall be made with an accuracy of 0.01 feet using either a fiberglass or steel tape measure.

Installation of the casing and screen is normally accomplished by emplacing them into the well as an integral unit. Prior to installation, decontaminate individual lengths of the well casing and screen according to Procedure I-F, *Equipment Decontamination*, unless the casing and screen were certified by the manufacturer to have been properly pre-cleaned at the factory and sealed in plastic. Following decontamination, inspect each length to ensure that damaged or otherwise unsuitable sections are not used.

To ensure even distribution of filter pack, bentonite seal, and grout materials around the well within the borehole, suspend the casing and screen with a threaded hoisting plug and do not allow them to rest on the bottom of the boring unless the installation is less than 30 feet deep.

5.6.2 Centralizers

Install centralizers at the top and bottom of screened sections when using the air or mud rotary techniques for well installation. Also place centralizers at 20- to 40-foot intervals on blank casing; the FM will determine the spacing according to the depth of the well. Align the centralizers from top to bottom of the casing so that they do not interfere with the insertion and removal of the tremie pipe. All devices used to affix centralizers to the casing shall not puncture the casing or contaminate the groundwater with which they come in contact. Centralizers shall be constructed of stainless steel.

5.6.3 Filter Pack Installation

Prior to the addition of any filter pack material, cover the top of the well casing to prevent filter pack material from entering it.

The filter pack is usually installed through HSAs, conductor casing, or a tremie pipe depending on the drilling technique used; however, if the depth to the bottom of the screened interval is less than 10 feet, and lithologic materials are sufficiently consolidated to preclude the possibility of hole collapse, the filter pack may be poured into the annular space of the well from the ground surface. This procedure applies to any drilling method.

During installation, measure the level of the top of the filter pack periodically to ensure that no bridging has occurred, and to determine the depth to the top of the filter pack. Be sure that the filter pack encloses the entire length of the screened section. For wells less than 100 feet in total depth, the filter pack shall generally extend to 2 feet above the top of the screened section of the well. For wells greater than 100 feet in total depth, an additional 1 foot of filter pack may be emplaced above the screen for each 100 feet of well depth.

An alternative to conventional monitoring well construction and installation is through the use of small diameter pre-fabricated monitoring wells, commonly referred to as “pre-pack” wells. Pre-pack wells typically consist of a well screen (slotted PVC) surrounded by sand (filter-pack) held in place by a stainless steel or polyethylene mesh. The pre-pack well assembly is commonly used in conjunction with direct-push drilling methodologies, which allows a relatively quick installation of these small diameter wells. Having the filter pack around the slotted PVC before the well screen is installed ensures that the filter pack is located directly around the well screen and minimizes the effort required for the filter pack installation.

The filter pack is normally an inert (e.g., siliceous) granular material that has a grain-size distribution chosen to retain formation materials. A sleeved screen consists of a slotted pipe base over which a sleeve of stainless steel mesh filled with selected filter media is installed. Pre-packed or sleeved screens may be used for any formation conditions, but they are most often used where heaving, running or blowing sands make placement of conventional well screens and filter packs difficult, or where predominantly fine-grained formation materials are encountered (ASTM 2010). During installation, the boring is advanced using hollow drive rods with an expendable drive point. Upon reaching the desired monitoring well installation depth, the entire well assembly (i.e., pre-pack well) is lowered to the desired depth within the hollow drive rods. At the desired depth, the hollow drive rods are retracted to a point above the screen. At this step a barrier is placed directly above the screen to prevent grout or material from entering the screened interval as the hollow drive rods are extracted from the boring. This barrier can be created either by natural formation collapse (occurring during the initial rod retraction), by gravity installation of fine-grade sand through the rod annulus, or as part of the pre-pack monitoring well components (e.g. expanding foam bridge). With the barrier in place, granular bentonite or bentonite slurry is then installed in the annulus to form a well seal. When installing pre-pack screens additional sand must be used to fill in the annular space between the pre-pack and the edge of the borehole. Furthermore, filter sand should be installed to at least 2 feet above the top of the pre-packed well screen.

Vendors offer pre-pack monitoring well components with varying outer diameters, which is typically based on the inner diameter of the hollow drill rods. These types of wells may be sampled by several methods including peristaltic pump, mini-bailer, or bladder pump to yield data of similar quality to that of conventional monitoring wells.

Following the installation of the filter pack, a surge block or large bailer shall be placed into and removed from the casing for approximately 10 minutes to set and compact the filter pack and to begin well development. Then, check the level of the filter pack again. Add more filter pack material according to the procedures described above if any settling of the filter pack has occurred. After emplacement, note the volume of filter pack material placed in the well, record it in the well completion record (Figure I-C-1-5), and compare it to the calculated volume of filter pack that was expected to have been used.

5.6.4 Annular Seal Installation

The sodium bentonite seal shall have a minimum thickness of 3 feet. Generally, to be effective the bentonite seal should extend above the filter pack approximately 3 to 5 feet. It may be constructed of powdered, granular, or pelletized bentonite, and may be emplaced as a dry solid, powder, or slurry. Use only sodium bentonite manufactured specifically for use in the drilling and construction of water wells. Typically, granular or pelletized bentonite is emplaced dry. Powdered bentonite is usually mixed with potable water to produce a slurry. Depending on the type of installation method, the bentonite may be emplaced through the HSAs, conductor casing, or tremie pipe.

In dry form, place the bentonite directly on the top of the filter pack. After emplacing each 1-foot-thick layer of dry bentonite in the well, add approximately 5 gallons of water of known chemical quality to hydrate the bentonite. Allow a minimum of 15 minutes for hydration of the bentonite seal once it is completely installed.

When emplacing the bentonite in slurry form, take care to ensure that the bentonite is thoroughly mixed, with no visible lumps to ensure the proper consistency. Then place a 1-foot layer of fine-grained silica sand over the top of the filter pack. This fine-grained sand layer will prevent infiltration of the filter pack by the bentonite slurry.

Emplace the remaining annular seal following the installation of the bentonite seal. The annular seal shall be a slurry consisting of 7 to 9 gallons of water per 94-pound bag of Portland cement Type I or II and a minimum of 3 to 5 percent bentonite (1/4 to 1/2 bags of bentonite powder per five bags of Portland cement). The slurry may be emplaced through a HSA, conductor casing, or tremie pipe, depending on the method of installation. Thoroughly mix the grout to ensure the proper consistency with no visible lumps of dehydrated powder. The rates at which the augers or pipe are withdrawn and the slurry added will be such that the level of the grout within the well annulus is just below the lowermost auger or pipe.

If a tremie pipe is used, emplace the annular grout seal by pumping through a pipe with a minimum 1-inch I.D., in one continuous pour, from the top of the transition seal to the ground surface. Place the bottom of the tremie pipe about 5 to 10 feet above the transition seal, depending on the stability of the hole and impact velocity of the grout.

A tremie pipe is not required for annular seals less than 10 feet from the ground surface to the top of the transition seal or for grouting within dual wall drill strings or HSAs. Measure the volume of grout seal material placed in the well, record it in the well construction log, and compare it with the calculated volume. The slurry shall extend from the top of the bentonite seal to a depth of approximately 2 feet below ground surface (bgs).

5.6.5 Annular Seal "Set Time" and Setting

Let the annular grout seal set at least 12 hours before disturbing the casing or well so that separations or breaks do not occur between the seal and the casing, or between the seal and the borehole. Development of the well is prohibited until the grout seal has set. Likewise, the concrete slab, traffic box, and/or casing riser of the surface completion shall not be poured and constructed until the grout seal has set. Top off any settlement of the grout seal as soon as possible after it sets. Record all pertinent data on the well construction log.

5.6.6 Surface Completion

The surface of a groundwater monitoring well shall be either an above-ground completion or as a flush-to-ground completion. Regardless of the method, each monitoring well shall have, at a minimum, a casing cap, concrete slab and annular seal, and a locking protective casing or locking vault. Although wellheads vary in size, effort should be made to use a consistent size wellhead or similar completion per site.

In an above-ground completion, the protective casing or monument is installed around the top of the well casing within a cement surface seal. A 2-foot-long by 2-foot-wide cement pad with a minimum thickness of 3 inches is constructed around the protective casing. Type 1 Portland cement, which meets the requirements of CLASS A standards, is used for the surface seal. Inspect the monument prior to installation to ensure that no oils, coatings, or chemicals are present. Once installed, maintain the monument in a plumb position with 2 to 3 inches of clearance between the top of the well casing and the lid of the monument. The monument shall extend at least 18 inches above grade and at least 12 inches below grade. Construct a minimum of three concrete-filled posts around the well to protect it from vehicular damage.

Inside the monument, cut or scribe two permanent survey marks, approximately 0.25 inches apart, into the top of the well casing, and also permanently mark the well with its identification number. Permanent marks may include painting, marking, or engraving on the protective casing or surface completion. An alternate option may be to attach a non-corroding, imprinted metal tag to part of the well. Cover the top of the well casing with a slip cap or locking cap to prevent debris from entering the well. Fit the monument with a casehardened lock to prevent unauthorized entry.

In a flush-to-ground completion, the protective casing or traffic box is installed around the top of the well casing, which has been cut off slightly below grade. The traffic box has a lid that is held firmly in place by bolts and has a flexible O-ring or rubber gasket to prevent water from entering the box. Whenever possible, wells with flush completions should not be placed in low spots where surface water can accumulate. If this is unavoidable, consider an aboveground completion. The traffic box is set within a cement surface seal slightly above grade to deflect surface water flow away from the well. The surface seal must form an apron at ground surface that is at least 2 feet wide and 4 inches thick. The concrete apron must slope away from the well (a minimum of 1 percent) to prevent surface water leakage into the well head (DOH 2009). An effort should be made to standardize the appearance of the well completions at a particular site. Type 1 Portland cement, which meets the requirements of CLASS A standard, is used for the surface seal. Where monitoring well protection must be installed flush with the ground, an internal cap should be fitted on top of the riser within the manhole or vault. This cap should be leak-proof so that if the vault or manhole fills with water, the water will not enter the well casing. The cap should also be able to lock to prevent unwanted access or tampering with the well. Ideally, the manhole cover cap should also be leak-proof (ASTM 2010). Inspect the traffic box prior to installation to ensure that no oils, coatings, or chemicals are present. Once installed, maintain the traffic box in a level position that leaves 2 to 3 inches of clearance between the top of the well casing and the lid of the traffic box. Regular maintenance may be necessary to maintain the integrity of the seals and pads protecting the wells.

Cut two permanent survey marks into the top of the well casing, approximately 0.25 inches apart, and also permanently mark the well with its identification number. Cover the top of the well casing with a lockable cap to prevent debris from entering the well. Also fit the lockable cap with a casehardened lock to prevent unauthorized entry.

In areas where there is a high probability of damaging the well (high traffic, heavy equipment, poor visibility), it may be necessary to enhance the normal protection of the monitoring well through the use of posts, markers, signs, or other means. The level of protection should meet the damage threat posed by the location of the well (ASTM 2010).

5.6.7 Installation of Surface Casing

The use of surface casing may be required to minimize the potential for cross-contamination of different hydrogeologic zones within the subsurface of a site. The depth of placement of the surface casing shall be based on site-specific geologic knowledge obtained from lithologic samples collected in situ during the drilling of the well boring.

If a surface casing is to be installed permanently along with the well, grout it in place. The borehole shall be of sufficient diameter that a tremie or grout pipe can be easily placed between the borehole wall and the outside of the surface casing. After the desired placement depth is reached and the drilling tools are removed from the borehole, lower the casing into the borehole and center it. The bottom of the surface casing may be plugged or driven into the sediment at the base of the borehole to keep grout from entering the casing, if necessary.

Install grout through the tremie pipe and pump it from the bottom of the casing to ground surface. As the grout is being placed, raise the tremie pipe slowly to avoid excessive backpressure and potential clogging of the tremie pipe. After the grout has been allowed to set for at least 24 hours, drilling and subsequent well installation can continue. The required time for grout to set before drilling can continue depends on the volume of grout emplaced; the more grout used, the longer the delay time.

JOB NO.: ____________ WELL NO. ____________ HYDROGEOLOGIST: ____________

CLIENT: ____________ DRILLER: ____________

WELL LOCATION: ____________ DATE/TIME: ____________

<u>DETAILS OF CONSTRUCTION</u>

Date Completed ________

Borehole Diameter (in.) ________

Type and Size of Casing (in.) ________

Type and Size of Screen (in.) ________

Screen Perforation Diameter (in.) ________

Screen Length (ft.) ________

Centralizer Depths (ft.) ________

Completion Technique

1. Type of Filter Pack and Placement Method ________
2. Type of Bentonite and Placement Method ________
3. Type of Grout Mixture and Placement Method ________

Description of Potential Problems With Well:

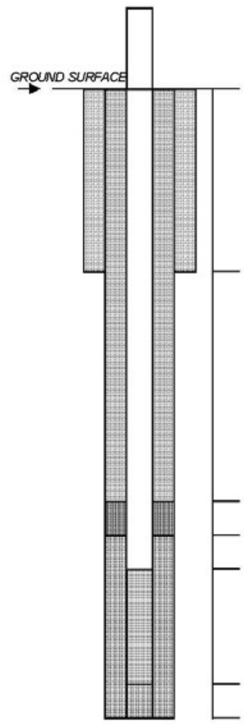
____

____

____

Development Technique

____



GROUT

BENTONITE

FILTER PACK

NOTE: ALL DEPTHS ARE REFERENCED TO GROUND SURFACE

Well Head Elevation ________

Ground Surface Elev. ________

Well Head Completion Method ________

Drilling Method/Rig Type ________

Surface Casing: Type ________

Diameter ________

Length ________

MATERIALS

Cement (sks.) ________

Filter Pack Material (ft.^{3}) ________

Casing Material (ft.) ________

Bentonite (ft.^{3}) ________

Top of Bentonite Seal ________ ft.

Top of Filter Pack ________ ft.

Top of Screen ________ ft.

Bottom of Screen ________ ft.

Bottom of Hole ________ ft.

Figure I-C-1-5: Well Completion Record

5.6.8 Shallow Well Completion

Due to the occurrence of shallow groundwater in some areas, there are instances when the top of the screened interval must be placed at a depth so shallow that it is impossible to install the well using the typical design for annular materials (i.e., 2 feet above the screen for filter pack followed by a 3-foot thickness of bentonite seal). In cases where the top of the screen must be placed between 4 and 6 feet bgs, use the following design alteration:

- Place the filter pack 1 foot above the top of the screened interval.
- Place a minimum of 3 feet of bentonite seal above the filter pack.
- Fill the remainder of annular space with a 3 percent to 5 percent bentonite-cement grout.

In no case shall the top of the screen be brought higher than 4 feet bgs because it is difficult to install a reliable annular seal at these shallow depths.

5.6.9 Method-specific Well Installation Techniques

The following sections describe well installation techniques for groundwater monitoring at hazardous waste sites. Sections on troubleshooting common problems encountered when using each technique and potential solutions to the problems are included.

5.6.9.1 HSA

General methods of well installation using the HSA technique are listed below:

- Complete a pre-installation design drawing in accordance with Section 5.4.1.
- Prior to well installation, properly decontaminate and measure the well screen, cap, and casing to ensure accurate placement of well casing and screen. Mark the well casing near the ground surface to signal to the drillers where the casing should be placed.
- Remember that wells are constructed within the augers as the augers are removed from the ground.
- The diameter of the well casing constructed within an HSA is limited to 4 inches. *Note:* The difference between the I.D. of the HSA and O.D. of the well casing must be at least 4 inches to permit effective placement of filter pack, bentonite seal, and grout.
- Remove the inner rod and hammer quickly, measure the depth of the borehole, and place the well screen and casing quickly into the auger to the desired depth. *Note:* the well screen and casing shall be suspended in hole by the use of a hoisting bail in order to ensure proper depth and plumb construction. This may not be necessary for wells less than 30 feet in depth.
- Prior to adding filter pack, cover the top of the well casing to prevent filter pack material from entering it.
- The HSA acts as tremie pipe for placement of filter pack, bentonite, and grout.
- Slowly pour filter pack between the inside of the auger and the outside of the well casing.
- While the filter pack material is being poured, incrementally withdraw the auger. The rate of auger withdrawal and filter pack placement shall allow for the top of the filter pack level to be just below the lead auger. In general, the augers should be withdrawn in increments of

2 to 3 feet. *Note:* The level of the top of the filter pack shall be constantly tagged with a measuring tape during emplacement of the filter pack.

- Surge the well to consolidate the filter pack; add more if settlement occurs.
- Emplace bentonite pellets or chips through the HSA. Tag the level of the bentonite periodically to ensure accurate placement. For each foot of bentonite seal installed in an unsaturated completion, pour 5 gallons of water of known chemical quality into the well to hydrate the bentonite. If the bentonite seal is less than 10 feet bgs and the borehole is stable, the bentonite may be emplaced directly from the top of the borehole rather than through the HSA.
- After allowing 15 minutes for the bentonite seal to hydrate, emplace a grout seal through the HSA from the top of the bentonite seal to within 2 feet of ground surface. The grout shall be emplaced from bottom to top in one continuous pour. If the top of the bentonite seal is less than 10 feet bgs and the borehole is not subject to collapse, the grout may be emplaced directly from the top of the borehole. If the top of the bentonite seal is greater than 10 feet bgs, a tremie tube shall be used to emplace the grout. The composition of the grout is detailed in Section 5.4.5.
- Construct an above- or below-ground wellhead.

Potential Problems and Solutions

Bridging Filter Pack or Bentonite Seal

Bridging filter pack or bentonite can create unwanted void spaces or lock the well casing within the HSA.

Avoidance of Locked Well Casing

- Carefully tag the filter pack level and keep it just below the lead auger while the auger is inched up and sand is slowly added.
- Use an auger with a larger I.D.
- Use filter pack materials with a larger grain size.
- Add water of known chemical quality while pouring the sand filter pack. Try this only in cases where the filter pack is very fine.

Solutions for Unlocking Well Casing from Augers

- Gently hold the casing in place while lifting and twisting the auger (do not force).
- Insert the surge block into the casing and gently surge the water column if bridge is below water table.
- Add water between the well and auger if the sand bridge is above the water table.
- Attach an air compressor to a tremie pipe, and then gently blow the bridge away.
- Completely remove the casing and screen, and reinstall the well.
- Never drive the casing out of the auger with a hammer because this will break the casing.

Heaving, Surging Materials

Fine-grained saturated materials that might cause surging problems are common in coastal areas. Heaving sediments might cause problems when drilling with HSA.

Solutions for Heaving Sediments

- Over-drill the borehole by 5 or 10 feet to provide space for heaving sediments to fill in while well installation begins. Begin placement of filter pack as soon possible. Add it quickly until over-drilled space is filled.
- Add clean water to a level above the water table to create a downward pressure on the heaving materials. The volume of water added shall be recorded on the well installation log and extracted during well development.
- Drill an initial pilot borehole and sample with a 6-inch-diameter auger. The 6-inch auger may be fitted with plastic or metal core catcher on the lead auger, which will allow for soil sampling and prevent sediments from entering augers. After the total sampling depth is reached, the 6-inch auger is removed and 10-inch-diameter augers are substituted to ream out the borehole. Fit the lead auger with a tapered stainless steel plug. At a depth below the desired total depth of the well, use the sampling hammer and center rod to knock out the stainless steel plug. Then complete well installation.

5.6.9.2 DIRECT ROTARY WITH FOAM OR MUD

General well installation techniques using direct rotary with foam or mud are listed below:

- Complete a pre-installation design drawing in accordance with Section 5.4.1.
- Prior to well installation, measure the well screen, cap, and casing to ensure accurate placement of well casing and screen. Place mark on the portion of the well casing near ground surface to identify to the drillers where the casing should be placed. Place centralizers on the well casing and screen as discussed in Section 5.5.2.
- With DRD techniques, wells are constructed in the borehole after the bit and drill pipe are removed from the hole. For mud rotary drilling, first thin the mud sufficiently prior to removing the bit and drill pipe from the hole. Thinning the mud allows faster and more accurate placement of the annular materials within the borehole, which balances the density of the borehole fluids so they more closely match the density of the fluids used to install the filter pack and bentonite seal. It also reduces the potential for annular materials to be washed out of the borehole through the tremie.
- After the bit and drill pipe are retrieved from the hole as smoothly and quickly as possible, measure the total depth of the hole to verify its depth and to check its stability.
- Suspend the well screen and casing in the hole by the use of hoisting bail in order to ensure proper depth and a plumb construction. This may be unnecessary for wells less than 30 feet in depth. Place the casing and screen in the hole as fast as is safely possible to minimize the time that the borehole stays open.
- Prior to the addition of filter pack, cover the top of the well casing to prevent filter pack material from entering the well casing.

- Use a tremie pipe for placement of filter pack, bentonite, and grout. Also emplace the filter pack and bentonite seal as soon as possible to avoid potential collapse of the hole.
- Slowly pour the filter pack into the tremie pipe to avoid bridging within the tremie pipe at the water table. The level of the top of the filter pack shall be constantly tagged with measuring tape as the filter pack is being emplaced.
- Make the bentonite seal at least 3 feet thick. It should consist of bentonite pellets or chips emplaced through the tremie pipe. Tag the level of the bentonite periodically to ensure accurate placement. If the bentonite seal is less than 10 feet bgs and the borehole is stable, the bentonite may be placed directly from the top of the borehole rather than through the tremie pipe.
- After allowing 15 minutes for the bentonite seal to hydrate, emplace a grout seal through the tremie pipe from the top of the bentonite seal to within 2 feet of ground surface. The grout shall be placed from bottom to top in one continuous pour. If the top of the bentonite seal is less than 10 feet bgs, and the borehole is not subject to collapse and is not filled with drilling fluid, the grout may be placed directly from the top of the borehole. The composition of the grout is detailed in Section 5.4.5.
- Construct an above- or below-ground wellhead.

Potential Problems and Solutions

Bridging Filter Pack or Bentonite Seal

Bridging filter pack or bentonite can create unwanted void spaces that might collapse in the future.

Solution

Controlled pouring of the annular materials is the best solution for bridging. In the case of mud rotary, however, it may be necessary to perform emplacement of the filter pack and bentonite chips or pellets through the borehole without the aid of a tremie pipe. For wells greater than 10 feet deep, obtain the approval of the QA Manager or Technical Director.

5.6.9.3 AIR ROTARY AND AIR ROTARY WITH CASING HAMMER

General well installation techniques using ARD or ARCH are listed below:

- Prepare a pre-installation design drawing in accordance with Section 5.4.1.
- Prior to well installation, properly decontaminate and measure the well screen, cap, and casing to ensure the accurate placement of well casing and screen.
- Remember that with ARD techniques, wells are constructed in the borehole after the bit and drill pipe are removed from the hole. With ARCH, the driven casing remains in the ground and is slowly withdrawn as well installation proceeds.
- After the bit and drill pipe are retrieved from the hole as smoothly and quickly as possible, measure the total depth of the hole to verify its depth and to check its borehole stability.
- To ensure proper depth and a plumb construction, suspend the well screen and casing in the hole using a hoisting bail. Place the casing and screen in the borehole as fast as is safely possible to minimize the time that the hole stays open, particularly for ARD.

- Before adding filter pack, cover the top of the well casing to prevent filter pack material from entering it.
- For ARD, use a tremie pipe for placement of filter pack, bentonite, and grout. Emplace the filter pack and bentonite seal as soon as possible to avoid potential collapse of the hole. For ARCH, the annular materials can in most cases be placed directly between the driven casing and the well casing. A tremie pipe is advisable if exacting placement is required.
- For ARD, place the tremie pipe within 2 feet of the interval where the filter pack is to be placed. Slowly pour the filter pack into the tremie pipe to avoid bridging within the tremie pipe at the water table. The tremie pipe shall be slowly withdrawn during placement.
- Periodically tag the level of the top of the filter pack with measuring tape while the filter pack is being emplaced. Install bentonite in a similar manner.
- For ARCH, pour the filter pack slowly between the well casing and driven casing. The driven casing shall be withdrawn periodically while the filter pack is being emplaced. Withdraw the driven casing in increments no greater than 2 to 3 feet.
- For ARD, emplace bentonite pellets or chips through the tremie pipe to a minimum thickness of 3 feet. Tag the level of the bentonite periodically to ensure accurate placement. For each foot of bentonite seal installed in an unsaturated completion, add 5 gallons of water of known chemical quality into the well to hydrate the bentonite. If the bentonite seal is less than 10 feet bgs and the borehole is stable, the bentonite may be emplaced directly from the top of the borehole rather than through the tremie pipe. For ARCH, emplace the bentonite between the well casing and the driven casing while the driven casing is being withdrawn.
- Emplace a grout seal through the tremie pipe for the ARD method or through the driven casing for the ARCH method. Emplace the grout from the top of the bentonite seal to within 2 feet of ground surface. The driven casing or tremie pipe shall be withdrawn as the grout is placed. Emplace the grout from bottom to top in one continuous pour following placement of the bentonite seal. If the top of the bentonite seal is less than 10 feet bgs and the borehole is not subject to collapse, emplace the grout directly from the top of the borehole. The composition of the grout is detailed in Section 5.4.5.
- Construct an above- or below-ground wellhead.

Potential Drilling Problems

Bridging Filter Pack or Bentonite Seal

Bridging filter pack or bentonite can create unwanted void spaces that might collapse in the future.

Solutions

Controlled pouring of the annular materials is the best solution against bridging.

Heaving Sediment

Fine-grained saturated materials that might cause heaving problems are common in coastal areas. Difficulties caused by heaving sediments might create problems when drilling with ARCH. Heaving sediments cannot be drilled using ARD techniques.

Solutions for Heaving Sediments

- Over-drill the borehole by 5 or 10 feet to provide space for heaving sediments to fill in while well completion is begun.
- Add clean water to a level above the water table to create a downward pressure on the heaving materials. The volume of water added should be extracted during well development.
- Heaving sands may also be controlled by first removing the drill pipe from the hole, and then constructing an airlift line made from the tremie pipe. If there is sufficient water above the heaving sands, an air line connected approximately 10 feet from the bottom of the tremie pipe can be used to air lift out the fine-grained sediments at the base of the casing.
- Begin placement of filter pack as soon as possible and add it quickly until the over-drilled space is filled.

5.6.9.4 DTCH

General well installation techniques using DTCH are listed below:

- Prepare a pre-installation design drawing in accordance with Section 5.4.1.
- Prior to well installation, measure the well screen, cap, and casing to ensure accurate depth placement of well casing and screen. Place a mark near the top of the casing to identify to the drillers the proper position to place the casing and screen.
- Like HSA drilling techniques, wells are constructed within the dual tube pipe as the pipe is removed from the ground.
- Prior to setting the casing and screen in the hole, verify total depth of the hole by measuring it and check for surging materials. Suspend the well screen and casing in the hole using a hoisting bail in order to ensure proper depth and plumb construction.
- Prior to addition of filter pack, cover the top of the well casing to prevent filter pack material from entering the well casing.
- The inner pipe of the dual tube assembly shall act as tremie pipe for placement of filter pack, bentonite, and grout.
- Slowly pour the filter pack between the inside of the augers and the outside of the well casing to avoid potential bridging of the annular materials. While the filter pack material is being poured, the dual tube pipe shall be incrementally withdrawn. The rate of pipe withdrawal and filter pack emplacement shall allow for the top of the filter pack level to be just below the shoe of the dual tube assembly. The level of the top of the filter pack shall be constantly tagged with measuring tape.
- Use bentonite pellets or chips to construct the well seal, which shall be a minimum of 3-feet thick, and shall also be emplaced through the dual tube assembly. For each foot of bentonite seal installed in an unsaturated completion, 5 gallons of water of known chemical quality shall be poured into the well to hydrate the bentonite. Tag the level of the bentonite periodically to ensure accurate emplacement. If the bentonite seal is less than 10 feet bgs and the borehole is stable, the bentonite may be emplaced directly from the top of the borehole rather than through the tremie pipe.

- Emplace a grout seal through the dual tube assembly from the top of the bentonite seal to within 2 feet of ground surface. Emplace the grout from bottom to top in one continuous pour immediately following emplacement of the bentonite seal. If the top of the bentonite seal is less than 10 feet bgs, the grout may be emplaced directly from the top of the borehole. The composition of the grout is detailed in Section 5.4.5.
- Construct an above- or below-ground wellhead.

Potential Problems and Solutions

Bridging Filter Pack or Bentonite Seal

Bridging filter pack or bentonite can create unwanted void spaces or lock the well casing and dual tube pipe together.

Avoidance of Locked Well Casing

- Tag carefully and always keep the filter pack just below the shoe while inching the dual tube assembly up and slowly adding sand.
- Use a smaller-diameter well casing.
- Use a filter pack with a larger grain size.
- Add water while pouring the sand filter pack. Avoid this unless absolutely necessary.

Solutions for Unlocking Well Casing from Dual Tube Pipe

- Insert a surge block into casing and gently surge the water column if the bridge is below water table.
- Add water between the well and piping if the sand bridge is above the water table.
- Attach an air compressor to a tremie pipe, and gently blow the bridge away.

Heaving, Surging Materials

Fine-grained saturated materials that might cause surging problems are common in coastal areas. Heaving sediments might cause problems when drilling with DTCH.

Solutions for Heaving Sediments

- Over-drill the borehole by 5 or 10 feet to provide space for heaving sediments to fill in while well completion begins.
- Add clean water to a level above the water table to create a downward pressure on the heaving materials. The volume of water added should be extracted during well development.
- Remove the drill pipe from the hole, and then construct an airlift line made from the tremie pipe. If there is sufficient water above the heaving sands, an air line connected approximately 10 feet from the bottom of the tremie pipe can be used to air lift out the fine-grained sediments at the base of the casing.
- Begin emplacement of the filter pack as soon as possible, and add it quickly until the over-drilled space is filled.

5.6.10 Well Construction Record Keeping Procedures

A written well completion record (Figure I-C-1-5) detailing the timing, amount of materials, and methods of installation/construction for each step of monitoring well construction shall be prepared during construction of each monitoring well by the FM or designate. Construction records shall be kept in a hard-bound field notebook dedicated to the CTO. An “as-built” drawing illustrating the placement location and amounts of all materials used in construction of each monitoring well shall be prepared in the field at the time of construction. The well construction record shall be filled out with indelible ink. Construction records shall include the date/time and quantities of materials used at each of the following stages of monitoring well construction, including:

- Drilling
  - Drill rig type
  - Drilling method/coring method
  - Drill bit/core barrel diameter (hole diameter)
  - Drill company, driller, helper(s)
  - Field geologist, supervising geologist
  - Dates/times start and finish drilling hole, interval drilling rates
  - Total depth of hole
  - Drilling location, surveyed ground elevation
  - Inclination of hole from horizontal
- Borehole abandonment – type, volume, and surface seal
- Casing material – type
- Casing decontamination – document process and equipment used
- Casing diameter – nominal I.D. of casing
- Screen material
  - Type
  - Top and bottom of section as actually installed
  - Length
  - Slot type, size, shape
  - Type of bottom plug and/or cap used
- Filter pack material
  - Composition and size gradation
  - Manufacturer
  - Actual volume and depth of top and bottom of filter pack
  - Calculated volume versus actual volume used and explanation of discrepancies
- Transition seal

  - Composition and depth of top and bottom of seal
  - Size (or gradation) or material used (e.g., pellets, granulated, or powdered)
  - Time allowed for hydration prior to emplacement of annular grout slurry seal
- Annular slurry seal
  - Date and time of beginning and completion of annular seal
  - Type and actual volume of seal
  - Calculated volume versus actual volume and explanation of discrepancies
  - Set time allowed prior to commencement of additional work
- Surface completion
  - Type of construction
  - Nature of materials used for surface completion
  - Date/time of completion

5.6.11 Well Location

A registered land surveyor shall survey each monitoring well location for exact horizontal location to the nearest 0.5 foot, and exact vertical location to the nearest 0.01 foot, referenced to mean sea level or mean low low water. The vertical elevation shall be surveyed between the two notches cut in the top of the well casing, which is the point from which all water level measurements shall be made. The elevation of the ground or top of the concrete slab adjacent to the monitoring well shall also be surveyed, to the nearest 0.01 foot.

5.7 WELL ABANDONMENT/DESTRUCTION

Once a monitoring well is no longer needed as part of an investigation, or has been damaged to the extent that it cannot be repaired, it is essential that it be properly abandoned. The proper abandonment of a monitoring well ensures that the underlying groundwater supply is protected and preserved. In addition, proper well abandonment eliminates a potential physical hazard and liability. An additional permit and/or inspection may be required for abandonment, depending on state or local regulations.

The standard procedures for the abandonment of a groundwater monitoring well apply to the HSA drilling method. This type of installation was chosen because it is the primary method of abandoning groundwater monitoring wells. For wells abandoned on Guam, the current Guam Environmental Protection Agency Well Abandonment Procedures shall be followed (Attachment I-C-1-1).

The first step in abandoning a groundwater monitoring well is to remove the surface completion from around the top of the well casing. This is normally accomplished using a jackhammer to break the surface cement seal, and then removing the monument or traffic box. When the surface seal and the wellhead cover have been removed, over-drill the well to its total depth using HSAs. Once the total depth of the well has been reached, remove the casing and screen from the borehole. Then completely backfill the borehole with a grout seal. Typically, the grout seal is emplaced as slurry of Portland cement grout, which contains a minimum of 3 to 5 percent bentonite as described in

Section 5.4.5. When mixing the slurry, take care that the bentonite is mixed according to the manufacturer's specifications to ensure the proper consistency.

Emplace the slurry through the HSAs. The rates at which the augers are withdrawn and the slurry is added shall be such that the level of the slurry within the borehole is just below the lead auger. The borehole seal shall extend from the total depth of the borehole to a depth of approximately 1 foot bgs. Then repair the surface to prior conditions and grade.

If the monitoring well casing cannot be pulled or drilled out, perforate the well casing adjacent to the saturated zones so that the annular space and any nearby voids can be filled with sealing material. Fill the perforated well or borehole from the bottom up with an appropriate sealing material, such as neat cement. Inject the neat cement under pressure to force it into the annular space, nearby voids, and filter pack. Apply pressure for a sufficient time to allow the cementing mixture to set. After the cement has hardened, excavate a hole around the well (use a backhoe if necessary) to the depth specified in the Monitoring Well Abandonment Work Plan (WP) and ensure the excavation depth is in accordance with local regulatory agency guidelines (Attachment 1 for *Guam Monitoring Well Abandonment Procedure*) (GEPA 2006). Remove the uppermost portion of the casing, (if still in place), and pour a cement cap on top of the abandoned well, and backfill the remaining portion of the excavation with sealing material. Note, if personnel are required to enter the excavation to remove the upper portion of the casing, then proper sloping and shoring are required as per Section 25, *Excavations* of The Safety and Health Requirements Manual EM 385-1-1 (USACE 2008).

The State of Hawaii Department of Health Hazard Evaluation and Emergency Response must be notified at least 1 week prior to any well abandonment activities conducted in Hawaii (DOH 2009, Section 6.2.5.1). Additionally, an Abandonment of Monitoring Well Summary Report should be prepared using the form presented in Attachment 1-C-1-2. The record should include the following information:

- Well construction information:
  - Date of installation
  - Drilling company
  - Total depth
  - Casing material/length
  - Screen material/length
  - Annular material
- General abandonment information:
  - Drilling firm (contact, mailing address, and phone number).
  - Consulting firm (contact, mailing address, and phone number).
- Well abandonment information
  - Date of abandonment
  - Reason for abandonment

- Details of how the casing/screen was removed drilled out or perforated.
- Sealing material (weight/volume/bags/mix ratio)

5.8 VAPOR EXTRACTION/MONITORING WELLS

Vapor extraction/monitoring wells have most of the same design and installation considerations and procedures as groundwater-monitoring wells, with the exception that they are screened in the unsaturated zone. Vapor extraction/monitoring wells generally shall not be screened over an interval greater than 20 feet and shall not be screened over two or more lithologies that have air permeabilities that differ by more than one order of magnitude. Vapor extraction/monitoring wells shall be installed using drilling techniques that do not require drilling fluids other than filtered air. Vapor monitoring wells may have casing I.D.s of 2 inches or less while extraction wells shall generally have casing I.D.s of at least 4 inches. The design of vapor extraction/monitoring wells is dependent upon many site-specific factors, such as the depth of contamination, soil conditions, geology, and depth to groundwater. As a result, specifics related to the design of these wells shall be included in the CTO WP, field sampling plan, or plans and specifications.

5.9 DRIVE POINTS

An alternative to conventional monitoring well construction is, under limited conditions, the use of drive points. These consist of slotted steel pipe that is pushed, hammered, or hydraulically jetted into the ground. A filter pack is not constructed around the screen, so the width of the screen openings must be sufficiently small to prevent the passage of significant quantities of sediment into the well during the withdrawal of water for sampling. In some instances, the drive points are used only as piezometers.

Drive points are commonly used in hazardous waste investigations to sample ambient soil gases in the vadose zone. It is often possible to extend the drive point below the water table to collect water samples. In some instances, permits may be required because the drive points are considered in some jurisdictions to be equivalent to a temporary monitoring well.

5.10 DISCRETE DEPTH GROUNDWATER SAMPLING

Another alternative to conventional monitoring well construction is the use of a discrete groundwater sampling device such as a Hydropunch. The Hydropunch tool can be used in conjunction with a standard drill rig, a cone penetrometer rig, or possibly a vehicle capable of driving vapor probes to sample groundwater and non-aqueous phase liquid in unconsolidated formations. The Hydropunch tool is constructed of a stainless steel drive point, a perforated section of Teflon pipe for a sample intake, and a stainless steel sample chamber. The tool is 55.5 inches long, 2 inches in O.D., and weighs approximately 24 pounds.

Ideally, a standard HSA drilling rig is used to drill a pilot hole to a depth just above the desired sampling depth. The Hydropunch tool is then hydraulically pushed or driven 4 to 5 feet through the saturated zone at each sampling location. As the tool is advanced, the sample intake screen remains pristine within the watertight stainless steel chamber. When the desired sampling interval is reached, the steel sampling chamber is unscrewed and withdrawn 1 foot to several feet, depending on how long a sampling interval is needed. This exposes the intake screen to the groundwater. Under hydrostatic pressure, groundwater flows through the intake screen and fills the sample chamber, without aeration or agitation occurring. The drive cone, which is attached to the base of the screen, will remain in place by soil friction.

The pointed shape of the sampler and its smooth exterior surface prevent downward transport of surrounding soil and groundwater as the tool is advanced. Once in place, the intake screen will be sealed from groundwater above and below the interval being sampled, because the exterior of the Hydropunch tool is flush against the surrounding soil wall. Additionally, as the tool is advanced, the sample intake screen is retained within the steel watertight sample chamber.

A stainless steel or Teflon bailer with a bottom check valve is lowered into the sample chamber to collect the groundwater sample. Groundwater is then decanted at ground surface from the bailer into the appropriate sample containers.

6. Records

Monitoring well location, design, and construction shall be recorded in the field notebook for the CTO and on a well completion record form (Figure I-C-1-5). The field operations manager should provide a copy of this form to the CTO Manager for the project files.

7. Health and Safety

Field personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

ASTM International (ASTM) 2010. *Standard Practice for Design and Installation of Ground Water Monitoring Wells*. D5092-04^{e1}(Reapproved 2010). West Conshohocken, PA.

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of Health, State of Hawaii (DOH). 2009. *Technical Guidance Manual for the Implementation of the Hawaii State Contingency Plan.* Interim Final. Honolulu: Office of Hazard Evaluation and Emergency Response. 21 June.

Department of the Navy (DON). 2010. *Ammunition and Explosives Safety Ashore*. NAVSEA OP 5 Volume 1, 7th Revision, Change 11. 0640-LP-108-5790. Commander, Naval Sea Systems Command. July 1.

———.2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

Guam Environmental Protection Agency (GEPA). 2006. *Well Abandonment Procedure*. Water Resources Management Program.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-A-5, Utility Clearance.

Procedure I-B-1, Soil Sampling.

Procedure I-B-5, Surface Water Sampling.

Procedure I-F, Equipment Decontamination.

9. Attachments

Attachment I-C-1-1, Guam Monitoring Well Abandonment Procedure

Attachment I-C-1-2, DOH Abandonment of Monitoring Well Summary Report Form

Attachment I-C-1-2

DOH Abandonment of Monitoring Well Summary Report Form

Abandonment of Monitoring Well Summary Report

__________________ **(Monitoring Well ID)**

Submit form within 30 days of well abandonment or within 90 days if included in a site closure, monitoring, or investigation report. In addition, submit copies of the original boring log and well construction diagram for the monitoring well, a site map showing the location of the abandoned monitoring well, and the disposal documentation for wastes generated during the abandonment process. Submit all documentation to: Hawaii Department of Health, Hazard Evaluation and Emergency Response Office, Attention: SDAR, 919 Ala Moana Blvd, Rm. 206, Honolulu Hawaii 96814.

Location Information	**Owner Information**
Facility Name:	Well Owner:
Facility Address:	Contact Person:
	Mailing Address:
Latitude:	
Longitude:	Phone Number: Fax Number:
TMK:	Land Owner:
Location Description:	Contact Person:
	Mailing Address:
Monitoring Well Location Map Attached: Y N	Phone Number: Fax Number:

Well Construction Information	
Date of Installation:	Casing Material: Casing Diameter:
Drilling Company:	Casing Length: Casing Depth:
Total Depth:	Screen Material: Slot Size:
Depth to Water:	Screen Length: Screen Depth:
Was the Well Set in an Aquifer that is a Current or Potential	Annular Material: Depth:
Drinking Water Source: Y N	Annular Material: Depth:
Boring Log/Well Construction Diagram Attached: Y N	Annular Material: Depth:

General Abandonment Information	
Drilling Firm:	Consulting Firm:
Contact Person:	Contact Person:
Mailing Address:	Mailing Address:
Phone Number: Fax Number:	Phone Number: Fax Number:

Well Abandonment Information	
Date of Abandonment:	Sealing Material: Depth:
Reason for Abandonment:	Volume/Weight/Bags Mixing Ratio:
Casing/Screen Removed: Y N	Sealing Material: Depth:
If Yes, was annular material removed?: Y N	Volume/Weight/Bags Mixing Ratio:
If No, was casing cut off below the surface?: Y N	Method of Sealing Material Placement:
Comments:	
Driller's Signature:	Date:
Consultant's Signature:	Date:

Monitoring Well Development

1. Purpose

This section describes the standard operating procedures for monitoring well development to be used by United States Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific personnel.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

None.

4. Responsibilities

The prime contractor CTO Manager is responsible for ensuring that these monitoring well development procedures are followed during projects conducted under the NAVFAC Pacific ER Program. The CTO Manager is responsible for ensuring that all personnel involved in monitoring well development shall have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager is responsible for ensuring that all project field staff follow these procedures.

Field personnel are responsible for the implementation of this procedure.

5. Procedure

5.1 INTRODUCTION

Well development procedures are crucial in preparing a well for sampling. They enhance the flow of groundwater from the formation into the well and remove the clay, silt, and other fines from the formation so that produced water will not be turbid or contain suspended matter that can interfere with chemical analyses. A monitoring well should be a "transparent" window into the aquifer from which samples can be collected that are truly representative of the quality of water that is moving through the formation.

The goal of well development is to restore the area adjacent to a well to its natural condition by correcting damage to the formation during the drilling process. Well development shall accomplish the following tasks:

- Remove a filter cake or any drilling fluid within the borehole that invades the formation.
- Remove fine-grained material from the filter pack.
- Increase the porosity and permeability of the native formation immediately adjacent to the filter pack.

Well development shall not occur until 24 hours after the completion of well installation to allow the annular seal to fully set up.

5.2 Factors Affecting Monitoring Well Development

5.2.1 Type of Geologic Materials

Different types of geologic materials are developed more effectively by using certain development methods. Where permeability is greater, water moves more easily into and out of the formation and development is accomplished more quickly. Highly stratified deposits are effectively developed by methods that concentrate on distinct portions of the formation. If development is performed unevenly, a groundwater sample will likely be more representative of the permeable zones. In uniform deposits, development methods that apply powerful surging forces over the entire screened interval will produce satisfactory results.

5.2.2 Design and Completion of the Well

Because the filter pack reduces the amount of energy reaching the borehole wall, it must be as thin as possible if the development procedures are to be effective in removing fine particulate material from the interface between the filter pack and natural formation. Conversely, the filter pack must be thick enough to ensure a good distribution of the filter pack material during emplacement. The general rule is that filter pack material must be at least 2 inches thick.

The screen slot size must be appropriate for the geologic material and filter pack material in order for development to be effective. If slot size is too large, the removal of too much sediment may cause settlement of overlying materials and sediment accumulation in the casing. When screen openings are too small, full development may not be possible and well yield will be below the potential of the formation. Additionally, incomplete development coupled with a narrow slot size can lead to blockage of the screen openings.

5.2.3 Drilling Method

The drilling method influences development procedure. Typical problems associated with specific drilling methods include the following:

- If a mud rotary method is used, mud cake builds up on the borehole wall and must be removed during the development process.

- If drilling fluid additives have been used, the development process must include an attempt to remove all fluids that have infiltrated into the native formation.
- If driven casing or hollow-stem auger methods have been used, the interface between the casing or auger flights and the natural formation may have been smeared with fine particulate matter that must be removed during the development process.
- If an air rotary method has been used in rock formations, fine particulate matter is likely to build up on the borehole walls and may plug pore spaces, bedding planes, and other permeable zones. These openings must be restored during the development process.

5.3 PREPARATION

In preparing for monitoring well development, development logs for any other monitoring wells in the vicinity should be reviewed to determine the general permeability of the water-bearing formation and the appropriate development method.

Depth to groundwater and information from the well construction log should be used in calculating the required quantity of water to be removed. The distance between the equilibrated water level and the bottom of the screen is the saturated section. The saturated section (feet) multiplied by the unit well volume per foot (gallons/linear foot) equals the gallons required to remove one total well volume of water. The unit well volume is the sum of the casing volume and the filter pack pore volume, both of which depend upon casing and borehole diameter and the porosity of the filter pack material. Well volume can be calculated using Table I-C-2-1, Table I-C-2-2, or Table 1-C-2-3.

Table I-C-2-1: Casing Volume*

Casing Diameter (inches)	Volume (gallon/linear foot)
2	0.16
4	0.65
6	1.47

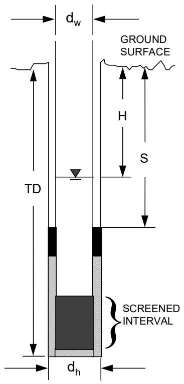
Table I-C-2-2: Filter Pack Pore Volume

Casing Diameter (inches)	Borehole Diameter (inches)	Volume [a] (gallon/linear foot)
2	6	0.52
2	8	0.98
4	10	1.37
4	12	2.09
6	12	1.76

* The above two volumes must be added together to obtain one unit well volume.
[a] Assumes a porosity of 40% for filter pack.

Table I-C-2-3: Well Volume Calculation

HOLE DIAMETER	d_h	=	
WELL CASING **INSIDE DIAMETER**	d_wID	=	
OUTSIDE DIAMETER	d_wOD	=	_____
DEPTH TO: **WATER LEVEL**	H	=	
BASE OF SEAL	S	=	_____
BASE OF WELL	TD	=	
EST. FILTER PACK POROSITY	P	=	_____



WELL VOLUME CALCULATION :

$$\text{CASING VOLUME} = V_c = \Pi\left(\frac{d_w ID}{2}\right)^2 (TD - H) = 3.14\left(\frac{\_\_\_}{2}\right)^2 (\_\_\_\_ - \_\_\_\_) = \_\_\_\_\_\_$$

$$\text{FILTER PACK PORE VOLUME} = V_f = \Pi\left[\left(\frac{d_h}{2}\right)^2 - \left(\frac{d_w OD}{2}\right)^2\right](TD - (S \text{ or } H^*)(P) = \_\_\_\_\_\_$$

$$(^* \text{if } S > H, \text{ use } S; \text{ if } S < H, \text{ use } H)$$

$$= 3.14\left[\left(\frac{\_\_\_}{2}\right)^2 - \left(\frac{\_\_\_}{2}\right)^2\right](\_\_\_ - \_\_\_)(\_\_\_) = \_\_\_\_\_\_$$

$$\text{TOTAL WELL VOLUME} = VT = Vc + Vf = \_\_\_\_ + \_\_\_\_ = \_\_\_\_\_\_ \text{ ft.}^3 \times 7.48 = \_\_\_\_\_\_ \text{ gal.}$$

5.4 DECONTAMINATION

The purpose of decontamination of development equipment is to prevent cross-contamination between monitoring wells. Use disposable equipment where appropriate. Use a steam-cleaner, if available, to decontaminate development equipment. Clean the equipment away from the monitoring well in such a fashion that decontamination effluent can be intercepted and drummed.

A triple rinse decontamination procedure is acceptable for equipment, such as bailers, or if access to a steam cleaner is not possible (Procedure I-F, *Equipment Decontamination*).

During well development, place visqueen around the well to prevent contamination at ground surface. Properly dispose of this sheeting after each use.

5.5 WELL DEVELOPMENT MONITORING

Throughout the well development process, maintain a development record using the form presented in Attachment I-C-2-1. The record should include the following information:

- General:
  - Project name and number
  - Well name/number and location
  - Date, time, and weather conditions
  - Names of personnel involved
- Development volume:
  - Initial and final water level
  - Casing total depth and diameter
  - Borehole diameter
  - Casing volume, filter pack pore volume, total well volume
  - Volume of water to be evacuated
  - Method and rate of removal
  - Appearance of water before and after development
- Monitoring data for each sample point:
  - Date, time, elapsed time
  - Cumulative gallons removed, removal method, removal rate
  - Temperature, pH (indicates the hydrogen ion concentration – acidity or basicity), specific conductivity, turbidity, dissolved oxygen, redox potential, and salinity

Part of the well development procedure shall consist of acquisition and analysis of water samples at appropriate intervals considering the total quantity of water to be removed. Measure conductivity, pH, temperature, dissolved oxygen, redox potential, turbidity, and salinity in each sample using a multi-parameter meter and flow-through cell. Collect readings on a periodic basis (approximately every 3 to 5 minutes) during development and obtain at least one reading after removal of each well volume. At the time each sample is analyzed, record the cumulative water removed, the time, the time elapsed during development, and calculated flow rate. Continue development until at least 3 borehole volumes have been removed, turbidity stabilizes at or below 5 nephelometric turbidity units, and three successive readings of the parameters have stabilized (values within 10 percent of each other). If stabilization has not been attained, if turbidity remains high, or if the well does not readily yield water, allow the water level in the well to recover, conduct an additional 15 minutes of mechanical surging and/or bailing, then continue development until stabilization can be achieved or for a reasonable time.

Section 5.7 describes well development in special situations, such as low yield formations and 2-inch wells.

5.6 METHODS OF MONITORING WELL DEVELOPMENT

The methods available for the development of monitoring wells have been inherited from production well practices. Methods include: (1) mechanical surging with a surge block or swab, and (2) surge pumping. Development methods using air or jetting of water into the well are generally inappropriate for development of monitoring wells due to the potential for affecting water quality.

Containerize and appropriately label all development water (unless it is permissible to discharge it on site). All development efforts must utilize mechanical surging or surge pumping, followed by bailing or groundwater removal with a pump. More detailed descriptions of appropriate development methods are presented below.

5.6.1 Mechanical Surging and Bailing

For mechanical surging and bailing, a surge block or swab is operated either manually or by a drill rig. The surge block or swab should be vented and be of sufficient weight to free-fall through the water in the well and create a vigorous outward surge. The equipment lifting the tool must be strong enough to extract it rapidly. A bailer is then used to remove fine-grained sediment and groundwater from the well.

Procedures:

1. Properly decontaminate all equipment entering the well.
2. Record the static water level and the total well depth.
3. Lower the surge block or swab to the top of the screened interval.
4. Operate in a pumping action with a typical stroke of approximately 3 feet.
5. Gradually work the surging downward through the screened interval during each cycle.
6. Surge for approximately 10 to 15 minutes per cycle.
7. Remove the surge block and attach the bailer in its place.
8. Bail to remove fines loosened by surging until the water appears clear.

9. Repeat the cycle of surging and bailing at least three times or until turbidity is reduced and stabilization of water quality parameters occurs.
10. The surging shall initially be gentle and the energy of the action should gradually increase during the development process.

The advantages (+) and disadvantages (–) of this method are listed below:

+ Reversing the direction of flow reduces bridging between large particles, and the inflow then moves the fine material into the well for withdrawal.
+ It affects the entire screened interval.
+ It effectively removes fines from the formation and the filter pack.
– It might cause upward movement of water in the filter pack that could disrupt the seal.
– Potential exists for damaging a screen with a tight-fitting surge block or with long surge strokes.

5.6.2 Surge Pumping

Procedures:

1. Properly decontaminate all equipment entering the well.
2. Record the static water level and the total well depth.
3. Lower a submersible pump or airlift pump without a check valve to a depth within 1 to 2 feet of the bottom of the screened section.
4. Start pumping and increase discharge rate to maximum capacity (overpumping), causing rapid drawdown of water in the well.
5. Periodically stop and start the pump, allowing the water in the drop pipe to fall back into the well and surge the formation (backwashing), thus loosening particulates.
6. The pump intake shall be moved up the screened interval in increments appropriate to the total screen length.
7. At each pump position, the well shall be pumped, overpumped, and backwashed alternately until satisfactory development has been attained as demonstrated by reduction in turbidity and stabilization of water quality parameters.

The advantages (+) and disadvantages (–) of this method are listed below:

+ Reversing the direction of flow reduces bridging between large particles, and the inflow then moves the fine material into the well for withdrawal.
+ It effectively removes fines from the formation and filter pack.
– The pump position or suction line must be changed to cover the entire screen length.

- Submersible pumps suitable to perform these operations may not be available for small diameter (1 inch or less) monitoring wells.
- It is not possible to remove sediment from the well unless particle size is small enough to move through the pump.

For additional information on well development, consult the references included in Section 8 of this procedure.

5.7 Special Situations

5.7.1 Development of Low Yield Wells

Development procedures for monitoring wells in low-yield (<0.25 gallons per minute), water-bearing zones are somewhat limited. Due to the low hydraulic conductivity of the materials, surging of water in and out of the well casing is difficult. Also, the entry rate of water is inadequate to remove fines from the well bore and the gravel pack when the well is pumped. Additionally, the process may be lengthy because the well can be easily pumped dry and the water level is very slow to recover.

Follow the procedures for mechanical surging and bailing for low yield wells. During surging and bailing, wells in low yield formations should be drawn down to total depth twice, if possible. Development can be terminated, however, if the well does not exhibit 80 percent recovery after 3 hours.

5.7.2 Development of 2-inch Wells

It is easier to develop monitoring wells that are large in diameter than small diameter wells. Mechanical surging or bailing techniques that are effective in large diameter wells are much less effective when used in wells 2 inches or less in diameter. Mechanical surge blocks and bailers have a high potential for damaging a small diameter well. As a result, the CTO Manager shall obtain approval from the QA Manager or Technical Director prior to installing groundwater monitoring wells with inside diameters of 2 inches or less.

Develop two-inch or smaller diameter wells by surging with a specially designed, hand-operated surge block or by pumping with a bladder or airlift pump. Information related to development of wells 2 inches or less in diameter shall be included in the CTO work plan.

6. Records

Well development information should be documented in indelible ink on well development monitoring forms (Attachment I-C-2-1). Copies of this information shall be sent to the CTO Manager and to the project files. The CTO Manager shall review all well development logs on a minimum monthly basis.

7. Health and Safety

Field personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-F, *Equipment Decontamination.*

9. Attachments

Attachment I-C-2-1: Well Development Record

Monitoring Well Sampling

1. Purpose

This standard operating procedure describes the monitoring well sampling procedures to be used by United States (U.S.) Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific personnel.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

None.

4. Responsibilities

The prime contractor CTO Manager is responsible for ensuring that these standard groundwater sampling activities are followed during projects conducted under the NAVFAC Pacific ER Program. The CTO Manager or designee shall review all groundwater sampling forms on a minimum monthly basis. The CTO Manager is responsible for ensuring that all personnel involved in monitoring well sampling shall have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager is responsible for ensuring that all project field staff follow these procedures.

Field sampling personnel are responsible for the implementation of this procedure.

Minimum qualifications for sampling personnel require that one individual on the field team shall have a minimum of 1 year experience with sampling monitoring wells.

The field sampler and/or task manager is responsible for directly supervising the groundwater sampling procedures to ensure that they are conducted according to this procedure, and for recording all pertinent data collected during sampling. If deviations from the procedure are required because of anomalous field conditions, they must first be approved by the QA Manager or Technical Director and then documented in the field logbook and associated report or equivalent document.

5. Procedures

5.1 PURPOSE

This procedure establishes the method for sampling groundwater monitoring wells for water-borne contaminants and general groundwater chemistry. The objective is to obtain groundwater samples of aquifer conditions with as little alteration of water chemistry as possible.

5.2 PREPARATION

5.2.1 Site Background Information

Establish a thorough understanding of the purposes of the sampling event prior to field activities. Conduct a review of all available data obtained from the site and pertinent to the water sampling. Review well history data including, but not limited to, well locations, sampling history, purging rates, turbidity problems, previously used purging methods, well installation methods, well completion records (including depth of screened interval), well development methods, previous analytical results, presence of an immiscible phase, historical water levels, and general hydrogeologic conditions.

Previous groundwater development and sampling logs give a good indication of well purging rates and the types of problems that might be encountered during sampling, such as excessive turbidity and low well yield. They may also indicate where dedicated pumps are placed in the water column. To help minimize the potential for cross-contamination, well purging and sampling, and water level measurement collection shall proceed from the least contaminated to the most contaminated as indicated in previous analytical results. This order may be changed in the field if conditions warrant it, particularly if dedicated sampling equipment is used. A review of prior sampling procedures and results may also identify which purging and sampling techniques are appropriate for the parameters to be tested under a given set of field conditions.

5.2.2 Groundwater Analysis Selection

Establish the requisite field and laboratory analyses prior to water sampling. Decide on the types and numbers of QA/quality control (QC) samples to be collected (Procedure III-B, *Field QC Samples [Water, Soil]*), as well as the type and volume of sample preservatives, the number of sample containers (e.g., coolers), and the quantity of ice or other chilling materials. The sampling personnel shall ensure that the appropriate number and size sample containers are brought to the site, including extras in case of breakage or unexpected field conditions. Document the analytical requirements for groundwater analysis in the project-specific work plan.

5.3 GROUNDWATER SAMPLING PROCEDURES

Groundwater sampling procedures at a site shall include: (1) measurement of well depth to groundwater; (2) assessment of the presence or absence of an immiscible phase; (3) assessment of purge parameter stabilization; (4) purging of static water within the well and well bore; and (5) obtaining a groundwater sample. Each step is discussed in sequence below. Depending upon specific field conditions, additional steps may be necessary. As a rule, at least 24 hours should separate well development and well sampling events.

5.3.1 Measurement of Static Water Level Elevation

Measure the depth to standing water and the total depth of the well to the nearest 0.01 foot to provide baseline hydrologic data, to calculate the volume of water in the well, and to provide information on the integrity of the well (e.g., identification of siltation problems). Mark each well with a permanent, easily identified reference point for water level measurements whose location and elevation have been surveyed.

Before purging the well, measure water levels in all of the wells within the zone of influence of the well being purged. Measure water levels twice in quick succession and record each measurement. This will provide a water level database that describes water levels across the site at one time (a synoptic sampling). Measure the water level in each well immediately prior to purging the well.

The device used to measure the water level surface and depth of the well shall be sufficiently sensitive and accurate in order to obtain a measurement to the nearest 0.01 foot reliably. An electronic water level meter will usually be appropriate for this measurement; however, when the groundwater within a particular well is highly contaminated, an inexpensive weighted tape measure can be used to determine well depth to prevent adsorption of contaminants onto the meter tape. The presence of light, non-aqueous phase liquids (LNAPLs) and/or dense, non-aqueous phase liquids (DNAPLs) in a well requires measurement of the elevation of the top and the bottom of the product, generally using an interface probe. Water levels in such wells must then be corrected for density effects to accurately determine the elevation of the water table.

5.3.2 Decontamination of Equipment

Establish a decontamination station before beginning sampling. The station shall consist of an area of at least 4 feet by 2 feet covered with plastic sheeting and be located upwind of the well being sampled and far enough from potential contaminant sources to avoid contamination of clean equipment. The station shall be large enough to fit the appropriate number of wash and rinse buckets, and have sufficient room to place equipment after decontamination. One central cleaning area may be used throughout the entire sampling event. The area around the well being sampled shall also be covered with plastic sheeting to prevent spillage. Further details are presented in Procedure I-F, *Equipment Decontamination*.

Decontaminate each piece of equipment prior to entering the well. Also conduct decontamination prior to sampling at a site, even if the equipment has been decontaminated subsequent to its last usage. This precaution is taken to minimize the potential for cross-contamination. Additionally, decontaminate each piece of equipment used at the site prior to leaving the site. It is only necessary to decontaminate dedicated sampling equipment prior to installation within the well. Do not place clean sampling equipment directly on the ground or other contaminated surfaces prior to insertion into the well. Dedicated sampling equipment that has been certified by the manufacturer as being decontaminated can be placed in the well without onsite decontamination.

5.3.3 Detection of Immiscible Phase Layers

Complete the following steps for detecting the presence of LNAPL and DNAPL, as necessary, before the well is evacuated for conventional sampling:

1. Sample the headspace in the wellhead immediately after the well is opened for organic vapors using either a photoionization detector or an organic vapor analyzer (flame ionization detector), and record the measurements.

2. Lower an interface probe into the well to determine the existence of any immiscible layer(s), LNAPL and/or DNAPL, and record the measurements.
3. Confirm the presence or absence of an immiscible phase by slowly lowering a clear bailer to the appropriate depth, then visually observing the results after sample recovery.
4. In rare instances, such as when very viscous product is present, it may be necessary to utilize hydrocarbon- and water-sensitive pastes for measurement of LNAPL thickness. This is accomplished by smearing adjacent, thin layers of both hydrocarbon- and water-sensitive pastes along a steel measuring tape and inserting the tape into the well. An engineering tape showing tenths and hundredths of feet is required. Record depth to water, as shown by the mark on the water-sensitive paste, and depth to product, as shown by the mark on the product-sensitive paste. In wells where the approximate depth to water and product thickness are not known, it is best to apply both pastes to the tape over a fairly long interval (5 feet or more). Under these conditions, measurements are obtained by trial and error, and may require several insertions and retrievals of the tape before the paste-covered interval of the tape encounters product and water. In wells where approximate depths of air-product and product-water interfaces are known, pastes may be applied over shorter intervals. Water depth measurements should not be used in preparation of water-table contour maps until they are corrected for depression by the product.

If the well contains an immiscible phase, it may be desirable to sample this phase separately. Sections 5.3.5.1 and 5.3.5.2 present immiscible phase sampling procedures. It may not be meaningful to conduct water sample analysis of water obtained from a well containing LNAPLs or DNAPLs. Consult the CTO Manager and QA Manager or Technical Director if this situation is encountered.

5.3.4 Purging Equipment and Use

The water present in a well prior to sampling may not be representative of *in situ* groundwater quality and shall be removed prior to sampling. Handle all groundwater removed from potentially contaminated wells in accordance with the investigation-derived waste (IDW) handling procedures in Procedure I-A-6, *Investigation-Derived Waste Management*.

Purging shall be accomplished by removing groundwater from the well at low flow rates using a pump. According to the U.S. Environmental Protection Agency (EPA) (EPA 1996), the rate at which groundwater is removed from the well during purging ideally should be less than 0.2 to 0.3 liters/min. The EPA further states that wells should be purged at rates below those used to develop the well to prevent further development of the well, to prevent damage to the well, and to avoid disturbing accumulated corrosion or reaction products in the well. The EPA also indicates that wells should be purged at or below their recovery rate so that migration of water in the formation above the well screen does not occur.

Realistically, the purge rate should be low enough that substantial drawdown in the well does not occur during purging. The goal is minimal drawdown (less than 0.1 meter) during purging (EPA 1996). The amount of drawdown during purging should be recorded at the same time the other water parameters are measured. Also, a low purge rate will reduce the possibility of stripping volatile organic compounds (VOCs) from the water, and will reduce the likelihood of mobilizing colloids in the subsurface that are immobile under natural flow conditions.

The sampler shall ensure that purging does not cause formation water to cascade down the sides of the well screen. Wells shall not be purged to dryness if recharge causes the formation water to cascade down the sides of the screen, as this will cause an accelerated loss of volatiles. This problem should be anticipated. Water shall be purged from the well at a rate that does not cause recharge water to be excessively agitated unless an extremely slow recharging well is encountered where complete evacuation is unavoidable.

In high yield wells (wells that exhibit 80 percent recovery in less than 2 hours), purging shall be conducted at relatively low flow rates and shall remove water from the entire screened interval of the well to ensure that fresh water from the formation is present throughout the entire saturated interval. In general, place the intake of the purge pump 2 to 3 feet below the air-water interface within the well to allow purging and at the same time minimize disturbance/overdevelopment of the screened interval in the well. During the well purging procedure, collect water level and/or product level measurements to assess the hydraulic effects of purging. Sample the well when it recovers sufficiently to provide enough water for the analytical parameters specified.

Low yield wells (those that exhibit less than 80 percent recovery in less than 2 hours) require one borehole volume of water to be removed. Allow the well to recover sufficiently to provide enough water for the specified analytical parameters, and then sample it.

Evaluate water samples on a regular basis (approximately every 5 minutes) during well evacuation and analyze them in the field preferably using a multi-parameter meter and flow-through cell for temperature, pH (indicates the hydrogen ion concentration – acidity or basicity), specific conductivity, dissolved oxygen (DO), oxidation reduction potential (ORP), turbidity, salinity, and total dissolved solids (TDS). Take at least five readings during the purging process. These parameters are measured to demonstrate that the natural character of the formation water has been pumped into the well. Purging shall be considered complete when three consecutive sets of field parameter measurements stabilize within approximately 10 percent (EPA 2006). However, suggested ranges are ±0.2 degrees Celsius for temperature, ±0.1 standard units for pH, ±3 percent for specific conductance, ±10 percent for DO, and ±10 millivolts for redox potential (ASTM 2001). This criterion may not be applicable to temperature if a submersible pump is used during purging due to the heating of the water by the pump motor. Enter all information obtained during the purging and sampling process including drawdown, into a groundwater sampling log (Figure I-C-3-1). Complete all blanks on this field log during sampling.

In cases where an LNAPL has been detected in the monitoring well, insert a stilling tube of a minimum diameter of 2 inches into the well prior to well purging. The stilling tube shall be composed of a material that meets the performance guidelines for sampling devices. Insert the stilling tube into the well to a depth that allows groundwater from the screened interval to be purged and sampled, but that is below the upper portion of the screened interval where the LNAPL is entering the well screen. The goal is to sample the aqueous phase (groundwater) while preventing the LNAPL from entering the sampling device. To achieve this goal, insert the stilling tube into the well in a manner that prevents the LNAPL from entering the stilling tube. However, sampling groundwater beneath a NAPL layer is not generally recommended due to the fact that the interval with residual NAPL saturation is often unknown and the NAPL can be mobilized into the well from intervals below the water table.

One method of doing this is to cover the end of the stilling tube with a membrane or material that will be ruptured by the weight of the pump. A piece of aluminum foil can be placed over the end of the stilling tube. Slowly lower the stilling tube into the well to the appropriate depth and then attach it firmly to the top of the well casing. When the pump is inserted, the weight of the pump breaks the foil covering the end of the tube, and the well can be purged and sampled from below the LNAPL layer. Firmly fasten the membrane or material that is used to cover the end of the stilling tube so that it remains attached to the stilling tube when ruptured. Moreover, the membrane or material must retain its integrity after it is ruptured. Pieces of the membrane or material must not fall off of the stilling tube into the well. Although aluminum foil is mentioned in this discussion as an example of a material that can be used to cover the end of the tube, a more chemically inert material may be required, based on the site-specific situation. Thoroughly decontaminate stilling tubes prior to each use. Collect groundwater removed during purging, and store it on site until its disposition is determined based upon laboratory analytical results. Storage shall be in secured containers, such as U.S. Department of Transportation-approved drums. Label containers of purge water with the standard NAVFAC Pacific ER Program IDW label.

The following paragraphs list available purging equipment and methods for their use.

5.3.4.1 BAILERS AND PUMPS

Submersible Pump: A stainless steel submersible pump may be utilized for purging both shallow and deep wells prior to sampling groundwater for volatile, semivolatile, and non-volatile constituents. For wells over 200 feet deep, the submersible pump is one of the few technologies available to feasibly accomplish purging under any yield conditions. For shallow wells with low yields, submersible pumps are generally inappropriate due to over stressing of the wells (<1 gallon per minute), which causes increased aeration of the water within the well.

Steam clean or otherwise decontaminate the pump and discharge tubing prior to the placing the pump in the well. The submersible pump shall be equipped with an anti-backflow check valve to keep water from flowing back down the drop pipe into the well. Place the pump intake approximately 2 to 3 feet below the air-water interface within the well and maintain it in that position during purging. Additionally, when pulling the pump out of the well subsequent to purging, take care to avoid dumping water within the drop pipe and pump stages back into the well.

Bladder Pump: A stainless steel and/or Teflon bladder pump can be utilized for purging and sampling wells up to 200 feet in depth for volatile, semivolatile, and non-volatile constituents. Additionally, the bladder pump can be used for purging and obtaining groundwater samples overlain by a LNAPL layer as long as care is taken not to draw the product layer into the bladder pump. Use of the bladder pump is most effective in low to moderate yield wells.

Either a battery powered compressor, compressed dry nitrogen, or compressed dry air, depending upon availability, can operate the bladder pump. The driving gas utilized must be dry to avoid damage to the bladder pump control box. Decontaminate the bladder pump prior to use. Once purging is complete, collect the samples directly from the bladder pump.

Centrifugal or Diaphragm Pump: A centrifugal, or diaphragm, pump may be used to purge a well if the water level is within 20 feet of ground surface. A new, or properly decontaminated, hose is lowered into the well and water withdrawn at a rate that does not cause excessive well drawdown.

GROUNDWATER SAMPLING LOG

WELL NO. ____________ LOCATION: ____________ PROJECT NO. ____________

DATE: TIME: ____________ CLIMATIC CONDITIONS: ____________

TIDAL CONDITIONS: Rising ☐ Falling ☐ HIGH TIDE: LOW TIDE: CURRENT TIDE:

STATIC WATER LEVEL (FT.) and TIME: ____________ TOTAL DEPTH (FT.): ____________

WELL PURGING: LENGTH OF SATURATED ZONE: ____________ LINEAR FT.

a VOLUME OF WATER TO BE EVACUATED: ________ GALS. (Gals/Linear ft. X linear feet of saturation X 3-casing volumes)

METHOD OF REMOVAL: ____________ PUMPING RATE: mL/min

WELL PURGE DATA:

DATE/ TIME	DTW	GALLONS REMOVED	TDS (g/L)	pH	SP. COND. (mS/cm)	D.O. (mg/L)	TURB. (NTU)	TEMP. (°C)	ORP (mV)	SAL (ppt)

SAMPLE WITHDRAWAL METHOD: ____________

APPEARANCE OF SAMPLE: COLOR: ____________

SEDIMENT: ____________

OTHER: ____________

LABORATORY ANALYSIS PARAMETERS AND PRESERVATIVES ____________

NUMBER AND TYPES OF SAMPLE CONTAINERS USED: ____________

SAMPLE IDENTIFICATION NUMBER(S) ____________

DECONTAMINATION PROCEDURES: ____________

NOTES: ____________

SAMPLED BY: ____________

SAMPLES DELIVERED TO: ____________ TRANSPORTER: ____________

DATE: ____________ TIME: ____________

CAPACITY OF CASING (GALLONS/LINEAR FOOT)

2"-0.16•4"-0.65•6"-1.47•8"-2.61•10"-4.08•12"-5.87

Figure I-C-3-1: Groundwater Sampling Log

Place the hose bottom approximately 2 to 3 feet below the air-water interface and maintain it in that position during purging.

Air Lift Pump: Airlift pumps are not appropriate for purging or sampling.

Bailer: Avoid using a bailer to purge a well because it can result in aeration of the water in the well and possibly cause excessive purge rates. If a bailer must be used, decontaminate the bailer, bailer wire, and reel as described in Section 5.3.2 prior to its use. Teflon-coated cable mounted on a reel is recommended for lowering the bailer in and out of the well.

Lower the bailer below the water level of the well with as little disturbance of the water as possible to minimize aeration of the water in the well. One way to gauge the depth of water on the reel is to mark the depth to water on the bailer wire with a stainless steel clip. In this manner, less time is spent trying to identify the water level in the well. The QA Manager or Technical Director shall approve use of bailers for purging monitoring wells in advance.

5.3.5 Monitoring Well Sampling Methodologies

5.3.5.1 Sampling Light, Non-Aqueous Phase Liquids (LNAPL)

Collect LNAPL, if present, prior to any purging activities. The sampling device shall generally consist of a dedicated or disposable bailer equipped with a bottom-discharging device. Lower the bailer slowly until contact is made with the surface of the LNAPL, and to a depth less than that of the immiscible fluid/water interface depth as determined by measurement with the interface probe. Allow the bailer to fill with the LNAPL and retrieve it.

When sampling LNAPLs, never drop bailers into a well, and always remove them from the well in a manner that causes as little agitation of the sample as possible. For example, the bailer should not be removed in a jerky fashion or be allowed to continually bang against the well casing as it is raised. When using bailers to collect LNAPL samples for inorganic analyses, the bailer shall be composed of fluorocarbon resin. Bailers used to collect LNAPL samples for organic analyses shall be constructed of stainless steel. The cable used to raise and lower the bailer shall be composed of an inert material (e.g., stainless steel) or coated with an inert material (e.g., Teflon).

5.3.5.2 Sampling Dense, Non-Aqueous Phase Liquids (DNAPL)

Collect DNAPL prior to any purging activities. The best method for collecting DNAPL is to use a double-check valve, stainless steel bailer, or a Kemmerer (discrete interval) sampler. The sample shall be collected by slow, controlled lowering of the bailer to the bottom of the well, activation of the closing device, and retrieval.

5.3.5.3 Groundwater Sampling Methodology

The well shall be sampled when groundwater within it is representative of aquifer conditions and after it has recovered sufficiently to provide enough volume for the groundwater sampling parameters. A period of no more than 2 hours shall elapse between purging and sampling to prevent groundwater interaction with the casing and atmosphere. This may not be possible with a slowly recharging well. Measure and record the water level prior to sampling to demonstrate the degree of recovery of the well. Sampling equipment (e.g., especially bailers) shall never be dropped into the well, as this could cause aeration of the water upon impact. Additionally, the sampling methodology utilized shall allow for the collection of a groundwater sample in as undisturbed a condition as possible, minimizing the potential for volatilization or aeration. This includes minimizing agitation and aeration during transfer to sample containers.

Sampling equipment shall be constructed of inert material. Equipment with neoprene fittings, polyvinyl chloride bailers, tygon tubing, silicon rubber bladders, neoprene impellers, polyethylene, and viton is not acceptable. If bailers are used, an inert cable/chain (e.g., fluorocarbon resin-coated wire or single strand stainless steel wire) shall be used to raise and lower the bailer. Generally, bladder and submersible pumps are acceptable sampling devices for all analytical parameters. Dedicated equipment is highly recommended for all sampling programs. The following text describes sampling methods utilizing submersible pumps, bladder pumps, and bailers.

Submersible Pumps: When operated under low-flow rate conditions (100 to 300 milliliters [mL]/minute or less), submersible pumps are as effective as bladder pumps in acquiring samples for volatile organic analysis as well as other analytes. The submersible pump must be specifically designed for groundwater sampling (i.e., pump composed of stainless steel and Teflon, sample discharge lines composed of Teflon) and must have a controller mechanism allowing the required low flow rate. Adjust the pump rate so that flow is continuous and does not pulsate to avoid aeration and agitation within the sample discharge lines. Run the pump for several minutes at the low flow rate used for sampling to ensure that the groundwater in the lines was obtained at the low flow rate. Higher pumping rates than 100 to 300 mL/minute may be used when collecting samples to be analyzed for non-volatile constituents, if significant drawdown does not occur.

Bladder Pumps: A gas-operated Teflon or stainless steel bladder pump with adjustable flow control and equipped with Teflon-lined tubing can be effectively utilized to collect a groundwater sample and is considered to be the best overall device for sampling inorganic and organic constituents. Operate positive gas displacement bladder pumps in a continuous manner so that they minimize discharge pulsation that can aerate samples in the return tube or upon discharge. If a bladder pump is utilized for the well purging process, the same bladder pump can also be utilized for sample collection after purging is complete.

Most models of bladder pumps can be operated with a battery powered compressor and control box. The compressor can be powered with either a rechargeable battery pack (provided with the compressor), by running directly off of a vehicle battery (via alligator clips), or by plugging into the vehicle’s direct current connector (cigarette lighter receptacle). When using a vehicle to power a compressor, several precautions should be taken. First, position the vehicle downwind of the well. Second, ensure the purge water exiting the well is collected into a drum or bucket. Finally, connect the compression hose from the well cap to the control box. Do not connect the compression hose from the compressor to the control box until after the engine has been started.

When all precautions are completed and the engine has been started, connect the compression hose to the control box. Slowly adjust the control knobs so as to discharge water at a flow rate (purge rate) that minimizes drawdown in the well, usually around 100 to 300 mL/minute. The compressor should not be set as to discharge the water as hard as possible. The optimal setting is one that produces the required purge rate per minute (not per purge cycle) while maintaining a minimal drawdown.

Prior to sampling volatiles constituents, turn off the vehicle engine, and obtain a flow rate of 100 mL/minute so as not to cause fluctuation in pH, pH-sensitive analytes, the loss of volatile constituents, or draw down of the groundwater table. If necessary (when sampling wells that require a large sample volume) the vehicle engine may be turned back on after sampling volatile constituents. Higher flow rates (100 to 300 mL/minute) can be used once the samples for the analysis of volatile components have been collected, but should not allow for increased draw down in the well. At no time shall the sample flow rate exceed the flow rate used while purging. Preserve the natural conditions of the groundwater, as defined by pH, DO, specific conductivity, and reduction/oxidation (redox).

For those samples requiring filtration, it is recommended to use in-line high capacity filters after all nonfiltered samples have been collected.

Bailers: A single- or double-check valve Teflon or stainless steel bailer equipped with a bottom discharging device can be utilized to collect groundwater samples. Bailers have a number of disadvantages, however, including a tendency to alter the chemistry of groundwater samples due to degassing, volatilization, and aeration; the possibility of creating high groundwater entrance velocities; differences in operator techniques resulting in variable samples; and difficulty in determining where in the water column the sample was collected. Therefore, use bailers for groundwater sampling only when other types of sampling devices cannot be utilized for technical or logistical reasons. The QA Manager or Technical Director must approve the use of bailers for groundwater sampling in advance.

Thoroughly decontaminate the bailer before being lowering it into the well if it is not a disposable bailer sealed in plastic. Collect two to three rinse samples and discharge them prior to acquisition of the actual sample. Each time the bailer is lowered to the water table, lower it in such a way as to minimize disturbance and aeration of the water column within the well.

The preferred alternative when using bailers for sampling is to use disposable Teflon bailers equipped with bottom-discharging devices. Use of disposable bailers reduces decontamination time and limits the potential for cross-contamination.

Passive Sampling: Passive samplers include passive diffusion bags, HydraSleeve, Snap Sampler, Gore Sorbers, and rigid porous polyethylene samplers. Passive samplers generate minimal waste and purge water, if any. Passive samplers depend on ambient equilibrium with formation water. These are relatively inexpensive, simple to deploy and work well for low-yield wells. However, passive samplers have volume and or analyte limitations and may require consideration of contaminant stratification. Passive samplers should be handled in accordance with the manufacturer’s instructions, Army guidance (USACE 2002), or ITRC guidance (ITRC 2007).

5.3.6 Sample Handling and Preservation

Many of the chemical constituents and physiochemical parameters to be measured or evaluated during groundwater monitoring programs are chemically unstable; therefore, preserve samples. The EPA document entitled, *Test Methods for Evaluating Solid Waste – Physical/Chemical Methods, SW-846* (EPA 2007), includes a discussion of appropriate sample preservation procedures. In addition, SW-846 specifies the sample containers to use for each constituent or common set of parameters. In general, check with specific laboratory requirements prior to obtaining field samples. In many cases, the laboratory will supply the necessary sample bottles and required preservatives. In some cases, the field team may add preservatives in the field. Sample containers should be labeled in accordance with Procedure III-E, *Record Keeping, Sample Labeling, and Chain of Custody.*

Improper sample handling may alter the analytical results of the sample. Therefore, transfer samples in the field from the sampling equipment directly into the container that has been prepared specifically for that analysis or set of compatible parameters as described in the CTO-specific work plan. It is not an acceptable practice for samples to be composited in a common container in the field and then split in the laboratory, or poured first into a wide mouth container and then transferred into smaller containers.

Collect groundwater samples and place them in their proper containers in the order of decreasing volatility and increasing stability. A preferred collection order for some common groundwater parameters is:

1. VOCs and total organic halogens (TOX)
2. Dissolved gases, total organic carbon (TOC), total fuel hydrocarbons
3. Semivolatile organics, pesticides
4. Total metals, general minerals (unfiltered)
5. Dissolved metals, general minerals (filtered)
6. Phenols
7. Cyanide
8. Sulfate and chloride
9. Turbidity
10. Nitrate and ammonia
11. Radionuclides

When sampling for VOCs, collect water samples in vials or containers specifically designed to prevent loss of VOCs from the sample. An analytical laboratory shall provide these vials, preferably by the laboratory that will perform the analysis. Collect groundwater from the sampling device in vials by allowing the groundwater to slowly flow along the sides of the vial. Sampling equipment shall not touch the interior of the vial. Fill the vial above the top of the vial to form a positive meniscus with no overflow. No headspace shall be present in the sample container once the container has been capped. This can be checked by inverting the bottle once the sample is collected and tapping the side of the vial to dislodge air bubbles. Sometimes it is not possible to collect a sample without air bubbles, particularly water that is aerated. In these cases, the investigator shall note the problem to account for possible error. Cooling samples may also produce headspace, but this will typically disappear once the sample is warmed prior to analysis. In addition, if the samples are shipped by air, air bubbles form most of the time. Field logs and laboratory analysis reports shall note any headspace in the sample container(s) at the time of receipt by the laboratory, as well as at the time the sample was first transferred to the sample container at the wellhead.

5.3.6.1 SPECIAL HANDLING CONSIDERATIONS

Samples requiring analysis for organics shall not be filtered. Samples shall not be transferred from one container to another because this could cause aeration or a loss of organic material onto the walls of the container. TOX and TOC samples shall be handled and analyzed in the same manner as VOC samples.

Obtain groundwater samples to be analyzed for metals sequentially. One sample shall be obtained directly from the pump and be unfiltered. The second sample shall be filtered through a 0.45-micron membrane in-line filter. Both filtered and unfiltered samples shall be transferred to a container, preserved with nitric acid to a pH less than 2, and analyzed for dissolved metals. Remember to include a filter blank for each lot of filters used and always record the lot number of the filters. In addition, allow at least 500 mL of effluent to flow through the filter prior to sampling. Any difference in concentration between the total and dissolved fractions may be attributed to the original metallic ion content of the particles and adsorption of ions onto the particles.

5.3.6.2 FIELD SAMPLING PRESERVATION

Preserve samples immediately upon collection. Ideally, sampling containers will be pre-preserved with a known concentration and volume of preservative. For example, metals require storage in aqueous media at pH of 2 or less. Typically, 0.5 mL of 1:1 nitric acid added to 500 mL of groundwater will produce a pH less than 2. Certain matrices that have alkaline pH (greater than 7) may require more preservative than is typically required. An early assessment of preservation techniques, such as the use of pH strips after initial preservation, may therefore be appropriate. The introduction of preservatives will dilute samples, and may require normalization of results. Guidance for the preservation of environmental samples can be found in the EPA *Handbook for Sampling and Sample Preservation of Water and Wastewater* (EPA 1982). Additional guidance can be found in other EPA documents (EPA 1992, 1996).

5.3.6.3 FIELD SAMPLING LOG

A groundwater sampling log (Figure I-C-3-1) shall document the following:

- Identification of well
- Well depth
- Static water level depth and measurement technique
- Presence of immiscible layers and detection method
- Well yield
- Purge volume and pumping rate
- Time that the well was purged
- Collection method for immiscible layers
- Sample identification numbers
- Well evacuation procedure/equipment
- Sample withdrawal procedure/equipment
- Date and time of collection
- Well sampling sequence
- Types of sample containers used and sample identification numbers
- Preservative(s) used
- Parameters requested for analysis

- Field analysis data
- Sample distribution and transporter
- Field observations on sampling event
- Name of collector
- Climatic conditions including air temperature

6. Records

Document information collected during groundwater sampling on the groundwater sampling log form in indelible ink (Figure I-C-3-1). Send copies of this information to the CTO Manager and to the project files.

7. Health and Safety

Field personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

ASTM International (ASTM). 2001. *Standard Guide for Sampling Ground-Water Monitoring Wells*. D4448). Reapproved in 2013). West Conshohocken, PA.

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

Environmental Protection Agency, United States (EPA). 1982. *Handbook for Sampling and Sample Preservation of Water and Wastewater.* EPA-600/4-82-029. Cincinnati: EPA Office of Research and Development, Environmental Monitoring and Support Laboratory.

———. 1992. *RCRA Groundwater Monitoring Draft Technical Guidance*. EPA/530/R-93/001. Office of Solid Waste. November.

———. 1996. *Ground Water Issue: Low-Flow (Minimal Drawdown) Ground-Water Sampling Procedures*. EPA/540/S-95/504. Office of Solid Waste and Emergency Response. April.

———. 2006. *Systematic Planning: A Case Study for Hazardous Waste Site Investigations. EPA WA/CS-1.* EPA/240/B-06/004. Office of Environmental Information. March.

———. 2007. *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846.* 3rd ed., Revision 6. Office of Solid Waste. November. On-line updates at: http://www.epa.gov/epawaste/hazard/testmethods/sw846/online/index.htm.

Interstate Technology and Regulatory Council (ITRC). 2007. *Protocol for Use of Five Passive Samplers to Sample for a Variety of Contaminants in Groundwater.* February.

United States Army Corps of Engineers (USACE). 2002. *Study of Five Discrete Interval-Type Groundwater Sampling Devices*. Cold Regions Research and Engineering Laboratory. Hanover, NH. August.

———. 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-A-6, *Investigation-Derived Waste Management.*

Procedure I-F, *Equipment Decontamination.*

Procedure III-B, *Field QC Samples (Water, Soil).*

Procedure III-E, *Record Keeping, Sample Labeling, and Chain of Custody.*

9. Attachments

None.

Drum Sampling

1. Purpose

This standard operating procedure describes the methods by which United States Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific personnel will sample drum(s) at hazardous waste and non-hazardous waste sites. Prior to disturbing and handling drums of unknown origin and/or with unknown contents, approval from the Navy will be required.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program. As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations

3. Definitions

None.

4. Responsibilities

The prime contractor CTO Manager is responsible for ensuring that drums of concern are handled and sampled according to this procedure. The CTO Manager is responsible for ensuring that all personnel involved in drum sampling have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager is responsible for ensuring that these procedures and the work plan (WP) are followed when drums are sampled.

Field sampling personnel are responsible for the implementation of this procedure.

5. Procedures

5.1 Method Summary

Prior to sampling, drums should be inventoried, staged, and opened. Inventorying entails recording the visible qualities of each drum and any characteristics pertinent to classification of the contents. Staging involves the organization, and sometimes consolidation, of drums containing similar wastes or that share characteristics. Closed drums may be opened manually or remotely. In the interest of worker safety, it is required to open drums remotely unless the drum contents are known not to present any potential physical or chemical threat to workers. Analytical results from associated field samples may be used to evaluate potential threats. The most widely used method of sampling a drum containing liquids involves the use of a glass thief. This method is quick, simple, relatively inexpensive, and does not require decontamination. Additional information related to drum sampling is available in Section 8, References.

5.2 INTERFERENCE AND POTENTIAL PROBLEMS

The practice of tapping drums to determine their contents is neither safe nor effective and should not be used. Any necessary air monitoring should be conducted when working near over-pressurized drums.

Do not move drums that are over-pressurized to the extent that the head is swollen several inches above the level of the chime (the protruding rings at the top and bottom of the drum). A number of devices have been developed for venting critically swollen drums. One method that has proven to be effective is a tube and spear device. A light aluminum tube (3 meters long) is positioned at the vapor space of the drum. A rigid, hooking device attached to the tube goes over the chime and holds the tube securely in place. The spear is inserted in the tube and positioned against the drum wall. A sharp blow on the end of the spear drives the sharpened tip through the drum, and the gas vents along the grooves. The venting should be done remotely (e.g., using a backhoe bucket) from behind a wall or barricade. Once the pressure has been relieved, the bung can be removed and the drum sampled. It is necessary that personnel experienced in sampling of over-pressurized or unknown drum contents, or known hazardous waste contents, perform this task. If project team personnel are not experienced in this type of sampling, it is recommended that a subcontractor experienced in this type of sampling implement this portion of the sampling.

5.3 EQUIPMENT/APPARATUS

The following are standard materials and equipment required for sampling:

- An approved site-specific sampling plan and health and safety plan (HSP)
- Personal protection equipment
- Sample containers appropriate for the matrix being sampled
- Uniquely numbered sample identification labels
- One-gallon covered cans half-filled with absorbent packing material, to be used as necessary to hold waste
- Chain-of-custody sheets
- Decontamination equipment (Procedure I-F, *Equipment Decontamination*.)
- Glass thieving tubes, composite liquid waste sampler (COLIWASA), or equivalent
- Drum-opening devices
- Monitoring equipment for the detection of toxic and explosive environments, whenever the contents are not known

5.3.1 Drum-Opening Devices

5.3.1.1 Bung Wrench

A common method for opening drums manually is using a universal bung wrench. The fittings on a bung wrench are made to remove nearly all commonly encountered bungs. They are usually constructed of cast iron, brass, or a bronze-beryllium, non-sparking alloy. The use of a non-sparking wrench does not eliminate the possibility of producing a spark.

5.3.1.2 Drum Deheader

One means by which a drum can be opened manually when a bung is not removable with a bung wrench is by using a drum deheader. This tool is constructed of forged steel with an alloy steel blade and is designed to partially or completely cut off the lid of a drum by means of scissors-like cutting action. A limitation of this device is that it can be attached only to closed head drums. Drums with removable heads or over-pressurized drums should be opened by other means.

5.3.1.3 Backhoe Spike

The most common means of opening drums remotely for sampling is the use of a metal spike attached or welded to a backhoe bucket. In addition to being very efficient, this method can greatly reduce the likelihood of personnel exposure.

5.3.1.4 Hydraulic Drum Opener

Hydraulic drum openers use hydraulic pressure to pierce the drum. It consists of a manually operated pump that pressurizes oil through a length of hydraulic line attached to a metal point that pierces the side or head of the drum.

5.3.1.5 Pneumatic Devices

A pneumatic bung remover consists of a compressed air supply that is controlled by a heavy-duty, two-stage regulator. A high-pressure air line of desired length delivers compressed air to a pneumatic drill, which is adapted to turn a bung fitting selected to fit the bung to be removed. An adjustable bracketing system positions and aligns the pneumatic drill over the bung. The bracketing system must be attached to the drum before the drill can be operated. Once the bung has been loosened, the bracketing system must be removed before the drum can be sampled. The pneumatic bung opener does not permit the slow venting of the container, and therefore, appropriate precautions must be taken. The pneumatic bung opener also requires the container to be upright and relatively level. This device cannot remove bungs that are rusted shut.

5.4 Sampling Procedure

5.4.1 Drum Staging

Prior to sampling, stage the drums (if not already staged) for easy access. Ideally, the staging area should be located just far enough from the drum opening area to prevent a chain reaction if one drum with unknown contents or visibly over-pressurized should explode or catch fire when opened.

During staging, physically separate the drums into the following categories: those containing liquids; those containing solids; lab packs; gas cylinders; and those that are empty. The strategy for sampling and handling drum/containers in each of these categories will be different. Categories are determined by:

- Visual inspection of the drum and its labels, codes, etc. Solids and sludges are typically disposed of in open top drums. Closed head drums with a bung opening generally contain liquid.
- Visual inspection of the contents of the drum during sampling, followed by restaging, if needed.

For discovered drums that require excavation, eliminate immediate hazards by over packing or transferring the drum's contents to another suitable container, affixing with a numbered tag, and transferring to a staging area. Use color-coded tags, labels, or bands to mark similar waste types. Record a description of each drum, its condition, any unusual markings, and the location where it was buried or stored on a drum data sheet (see Attachment I-D-1-1.) This data sheet becomes the principal record-keeping tool for tracking the drum on site.

Where space allows, physically separate the unknown or suspected hazardous waste-containing or over-pressurized drum opening area from the drum removal and drum staging operations. Move drums from the staging area to the drum opening area one at a time using forklift trucks equipped with drum grabbers or a barrel grappler. In a large-scale drum handling operation, drums may be conveyed to the drum opening area using a roller conveyor.

5.4.2 Drum Opening

There are three techniques for opening drums at suspected or known hazardous waste sites:

- Manual opening with non-sparking bung wrenches
- Drum deheading
- Remote drum puncturing and bung removal

The choice of drum opening technique and accessories depends on the number of drums to be opened, their waste contents, and their physical condition. Remote drum opening equipment should always be considered to protect worker safety. Under Occupational Safety and Health Administration 1910.120 (OSHA 1998), manual drum opening with bung wrenches or deheaders should be performed only on structurally sound drums whose waste contents are known not to be shock sensitive, reactive, explosive, or flammable.

5.4.2.1 Manual Drum Opening

Bung Wrench

Do not perform manual drum opening with bung wrenches unless the drums are structurally sound (no evidence of bulging or deformation) and their contents are known to be non-explosive. If opening the drum with bung wrenches is deemed reasonably cost-effective and safe, then certain procedures should be implemented to minimize the hazard:

- Field personnel should be fully outfitted with protective gear.
- Continually monitor atmospheres for toxicity, explosivity, and if applicable, radioactivity.

- Position drums upright with the bung up, or, for drums with bungs on the side, laid on their sides with the bung plugs up.
- The wrenching motion should be a slow, steady pull across the drum. If the length of the bung wrench handle provides inadequate leverage for unscrewing the plug, attach a "cheater bar" to the handle to improve leverage.

5.4.2.2 Drum Deheading

Do not perform drum deheading unless the drums are structurally sound (no evidence of bulging or deformation) and their contents are known to be non-explosive. Drums are opened with a drum deheader by first positioning the cutting edge just inside the top chime and then tightening the adjustment screw so that the deheader is held against the side of the drum. Moving the handle of the deheader up and down while sliding the deheader along the chime will enable the entire top to be rapidly cut off, if desired. If the top chime of a drum has been damaged or badly dented, it may not be possible to cut the entire top off. Because there is always the possibility that a drum may be under pressure, make the initial cut very slowly to allow for the gradual release of any built-up pressure. A safer technique would be to employ a remote method prior to using the deheader.

Self-propelled drum openers, which are either electrically or pneumatically driven, are available and can be used for quicker and more efficient deheading.

5.4.2.3 Remote Opening

Remotely operated drum opening tools are the safest available means of opening a drum. Remote drum opening is slow, but provides a high degree of safety compared to manual methods of opening.

Backhoe Spike

"Stage" or place drums in rows with adequate aisle space to allow ease in backhoe maneuvering. Once staged, punching a hole in the drumhead or lid with the spike can quickly open the drums.

Decontaminate the spike after each drum is opened to prevent cross contamination. Even though some splash or spray may occur when this method is used, mounting a large shatter-resistant shield in front of the operator's cage can protect the operator of the backhoe. When combined with the normal personal protection gear, this practice should protect the operator. Providing the operator with an on-board air line system affords additional respiratory protection.

Hydraulic Devices

Hydraulic devices consist of a piercing device with a metal point that is attached to the end of a hydraulic line and is pushed into the drum by hydraulic pressure. The piercing device can be attached so that a hole for sampling can be made in either the side or the head of the drum. Some of the metal piercing devices are hollow or tube-like so that they can be left in place, if desired, to serve as a permanent tap or sampling port. The piercing device is designed to establish a tight seal after penetrating the container.

Pneumatic Devices

Pneumatically operated devices using compressed air have been designed to remove drum bungs remotely.

5.4.3 Drum Sampling

Immediately after the drum has been opened, sample the headspace gases within the drum using an explosimeter, organic vapor analyzer, and/or a photoionization detector, and record the data on the Drum Data Sheet (see Attachment I-D-1-1) as necessary. The CTO WP shall reference procedures listed in the site HSP.

In most cases, it is impossible to observe the contents of these sealed or partially sealed drums. Because some layering or stratification is likely in any solution left undisturbed over time, take a sample that represents the entire depth of the vessel. In addition, a sample of solid material collected from a drum should include the entire depth to be most representative of the drum contents.

When sampling a previously sealed drum, check for the presence of bottom sludge. This is easily accomplished by measuring the depth to apparent bottom, and then comparing it to the known interior depth.

5.4.3.1 Glass Thief Sampler

The most widely used implement for sampling liquids in a drum is a glass tube (glass thief, 6 millimeters inner diameter × 30.47 centimeters [cm] [48 inches] length). This tool is simple, cost effective, quick, and collects a sample without having to decontaminate.

Specific Sampling Procedure Using a Glass Thief

1. Remove the cover from the sample container.
2. Slowly insert the glass tubing almost to the bottom of the drum or until a solid layer is encountered. About 1 foot of tubing should extend above the drum.
3. Allow the waste in the drum to reach its natural level in the tube.
4. Cap the top of the sampling tube with a tapered stopper or thumb, ensuring liquid does not come into contact with the stopper.
5. Carefully remove the capped tube from the drum, and insert the uncapped end into the sample container. Do not spill liquid on the outside of the sample container.
6. Release the stopper, and allow the glass thief to drain completely into the sample container. Fill the container to about 2/3 of capacity.
7. Remove the tube from the sample container, carefully break it into pieces, and place the pieces in the drum.
8. Cap the sample container tightly, and place the pre-labeled sample container in a carrier.
9. Replace the bung or place plastic over the drum.
10. Transport the sample to the decontamination zone to be prepared for transport to the analytical laboratory.

In many instances, a drum containing waste material will have a sludge layer on the bottom. Slow insertion of the sampling tube down into this layer and then a gradual withdrawal will allow the sludge to act as a bottom plug to maintain the fluid in the tube. The plug can be gently removed and placed into the sample container by the use of a stainless steel lab spoon.

In some instances, disposal of the tube by breaking it into the drum might interfere with eventual plans for the removal of its contents. Clear this technique with NAVFAC Pacific personnel or evaluate other disposal techniques.

5.4.3.2 COLIWASA Sampler

The COLIWASA is a much-cited sampler designed to permit representative sampling of multiphase wastes from drums and other containerized wastes. It collects a sample from the full depth of a drum and maintains it in the transfer tube until delivery to the sample bottle. One configuration consists of a 152 cm by 4 cm-inner diameter section of tubing with a neoprene stopper at one end attached by a rod running the length of the tube to a locking mechanism at the other end. Manipulation of the locking mechanism opens and closes the sampler by raising and lowering the neoprene stopper.

The major drawbacks associated with using a COLIWASA include decontamination and cost. The sampler is difficult (if not impossible) to decontaminate in the field, and its high cost relative to alternative procedures (glass tubes) make it an impractical throwaway item. However, disposable, high-density, inert polyethylene COLIWASAs are available at a nominal cost. Although the applications of a disposable COLIWASA are limited, it is especially effective in instances where a true representation of a multiphase waste is absolutely necessary.

Procedures for Use

1. Open the sampler by placing the stopper rod handle in the T-position and pushing the rod down until the handle sits against the sampler’s locking block.
2. Slowly lower the sampler into the liquid waste. Lower the sampler at a rate that permits the levels of the liquid inside and outside the sampler tube to be about the same. If the level of the liquid in the sample tube is lower than that outside the sampler, the sampling rate is too fast and will result in a non-representative sample.
3. When the sampler stopper hits the bottom of the waste container, push the sampler tube downward against the stopper to close the sampler. Lock the sampler in the closed position by turning the T-handle until it is upright and one end rests tightly on the locking block.
4. Slowly withdraw the sampler from the waste container with one hand while wiping the sampler tube with a disposable cloth or rag with the other hand.
5. Carefully discharge the sample into a suitable sample container by slowly pulling the lower end of the T-handle away from the locking block while the lower end of the sampler is positioned in a sample container.
6. Cap the sample container with a Teflon-lined cap, attach a label and seal, and record it on the sample data sheet.
7. Unscrew the T-handle of the sampler, and disengage the locking block.
8. Clean the sampler.

5.5 Drum Closing

Upon completion of sampling activities, close the drums, and then store them in a secure area as described in Procedure I-A-6, *Investigation-Derived Waste Management*. If the bung opening and the bung are still intact, then close the drum by replacing the bung. In addition, open top drums that are still in good condition can be closed by replacing the top and securing the drum ring with the attached bolt.

If a drum cannot be closed in the manner discussed above, then secure it by placing it in an approved 85-gallon overpack drum (type UN 1A2/Y43/S). Fill the void spaces between the outer portion of the inner drum and the inside of the overpack drum with vermiculite to secure the drum contents to the extent possible.

5.6 Equipment Decontamination

Decontamination of sampling equipment should follow Procedure I-F, *Equipment Decontamination*.

5.7 Sample Preservation, Containers, Handling, and Storage

1. Do not add preservatives to the sample unless specifically required by the analytical method or WP.
2. Place the labeled sample container in two re-sealable plastic bags.
3. If the contents of the investigation-derived waste drum are unknown, or known to contain hazardous waste, place each bagged sample container in a 1-gallon covered can containing absorbent packing material. Place the lid on the can.
4. Mark the sample identification number on the outside of the can.
5. Place the samples in a cooler, and fill the remaining space with absorbent packing material.
6. Fill out the chain-of-custody record for each cooler, place it in a re-sealable plastic bag, and affix it to the inside lid of the cooler.
7. Secure the lid of the cooler, and affix the custody seal.
9. Arrange for the appropriate transport mode consistent with the type of waste involved (hazardous or non-hazardous).

6. Records

Keep records of all sampling activities in the field notebook and on the Drum Data Sheets. Document sample custody on the chain-of-custody form. The CTO Manager shall review these documents at the completion of field activities, and, at least on a monthly basis for long-term projects.

7. Health and Safety

Field Personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

Occupational Safety and Health Administration (OSHA). 1998. *Occupational Safety and Health Standards* (29 CFR 1910); with special attention to Section 1910.120, *Hazardous Waste Operations and Emergency Response (HAZWOPER)*. Washington, DC: United States Department of Labor.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-A-6, *Investigation-Derived Waste Management.*

Procedure I-F, *Equipment Decontamination.*

9. Attachments

Attachment I-D-1-1: Drum Data Sheet

Soil and Rock Classification

1. Purpose

This section sets forth standard operating procedures for soil and rock classification for use by United States Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific personnel.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

None.

4. Responsibilities

The prime contractor CTO Manager is responsible for ensuring that these standard soil and rock classification procedures are followed during projects conducted under the ER Program and that a qualified individual conducts or supervises the projects. A qualified individual is defined as a person with a degree in geology, hydrogeology, soil science, or geotechnical/civil engineering with at least 1 year of experience classifying soil. Supervision is defined as onsite and continuous monitoring of the individual conducting soil classification. The CTO Manager is responsible for ensuring that all personnel involved in soil and rock classification have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The CTO Manager is responsible for reviewing copies of the field boring log forms on a monthly basis at a minimum. However, it is recommended that initially boring logs are reviewed daily to ensure accuracy.

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager is responsible for field oversight to ensure that all project field staff follow these procedures.

Field personnel are responsible for the implementation of this procedure.

5. Procedures

5.1 SOIL CLASSIFICATION

The basic purpose of the classification of soil is to thoroughly describe the physical characteristics of the sample and to classify it according to an appropriate soil classification system for the NAVFAC Pacific ER Program. The Unified Soil Classification System (USCS) was developed so that soils could be described on a common basis by different investigators and serve as a "shorthand" description of soil. A classification of a soil in accordance with the USCS includes not only a group symbol and name, but also a complete word description.

Describing soil on a common basis is essential so that soil described by different site qualified personnel is comparable. Site individuals describing soil as part of site activities *must* use the classification system described herein to provide the most useful geologic database for all present and future subsurface investigations and remedial activities at NAVFAC Pacific ER Program sites.

The site geologist or other qualified individual shall describe the soil and record the description in a boring log or logbook. The essential items in any written soil description are as follows:

- Classification group name (e.g., silty sand)
- Color, moisture, and odor
- Range of particle sizes
- Approximate percentage of boulders, cobbles, gravel, sand, and fines
- Plasticity characteristics of the fines
- In-place conditions, such as density/consistency, compaction, amount of induration/cementation or weathering, retention of the parent rock fabric, and structure
- USCS classification symbol

The USCS serves as "shorthand" for classifying soil into 15 basic groups:

GW[1] Well graded (poorly sorted) gravel (>50 percent gravel, <5percent fines)

GP[1] Poorly graded (well sorted) gravel (>50percent gravel, <5percent fines)

GM[1] Silty gravel (>50 percent gravel, >15 percent silt)

GC[1] Clayey gravel (>50 percent gravel, >15 percent clay)

SW[1] Well graded (poorly sorted) sand (>50 percent sand, <5 percent fines)

SP[1] Poorly graded (well sorted) sand (>50 percent sand, <5 percent fines)

SM[1] Silty sand (>50 percent sand, >15 percent silt)

SC[1] Clayey sand (>50 percent sand, >15 percent clay)

[1] If percentage of fine is 5 percent to 15 percent, a dual identification shall be given (e.g., a soil with more than 50 percent poorly sorted gravel and 10 percent clay is designated GW-GC.

ML[2] Inorganic, low plasticity silt (slow to rapid dilatancy, low toughness, and plasticity)

CL[2] Inorganic, low plasticity (lean) clay (no or slow dilatancy, medium toughness and plasticity)

MH[2] Inorganic elastic silt (no to slow dilatancy, low to medium toughness and plasticity)

CH[2] Inorganic, high plasticity (fat) clay (no dilatancy, high toughness, and plasticity)

OL Organic low plasticity silt or organic silty clay

OH Organic high plasticity clay or silt

PT Peat and other highly organic soil

Figure I-E-1 defines the terminology of the USCS. Flow charts presented in Figure I-E-2 and Figure I-E-3 indicate the process for describing soil. The particle size distribution and the plasticity of the fines are the two properties of soil used for classification. In some cases, it may be appropriate to use a borderline classification (e.g., SC/CL) if the soil has been identified as having properties that do not distinctly place the soil into one group.

5.1.1 Estimation of Particle Size Distribution

One of the most important factors in classifying a soil is the estimated percentage of soil constituents in each particle size range. Being proficient in estimating this factor requires extensive practice and frequent checking. The steps involved in determining particle size distribution are listed below:

1. Select a representative sample (approximately 1/2 of a 6-inch long by 2.5-inch diameter sample liner).
2. Remove all particles larger than 3 inches from the sample. Estimate and record the percent by volume of these particles. Only the fraction of the sample smaller than 3 inches is classified.
3. Estimate and record the percentage of dry mass of gravel (less than 3 inches and greater than 1/4 inch).
4. Considering the rest of the sample, estimate, and record the percentage of dry mass of sand particles (about the smallest particle visible to the unaided eye).
5. Estimate and record the percentage of dry mass of fines in the sample (do not attempt to separate silts from clays).
6. Estimate percentages to the nearest 5 percent. If one of the components is present in a quantity considered less than 5 percent, indicate its presence by the term “trace.”
7. The percentages of gravel, sand, and fines must add up to 100 percent. “Trace” is not included in the 100 percent total.

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[2] If the soil is estimated to have 15 percent to 25 percent sand or gravel, or both, the words “with sand” or “with gravel” (whichever predominates) shall be added to the group name (e.g., clay with sand, CL; or silt with gravel, ML). If the soil is estimated to have 30 percent or more sand or gravel, or both, the words “sandy” or “gravely” (whichever predominates) shall be added to the group name (e.g., sandy clay, CL). If the percentage of sand is equal to the percent gravel, use “sandy.”

5.1.2 Soil Dilatancy, Toughness, and Plasticity

5.1.2.1 DILATANCY

To evaluate dilatancy, follow these procedures:

1. From the specimen, select enough material to mold into a ball about 1/2 inch (12 millimeters [mm]) in diameter. Mold the material, adding water if necessary, until it has a soft, but not sticky, consistency.
2. Smooth the soil ball in the palm of one hand with the blade of a knife or small spatula. Shake horizontally, striking the side of the hand vigorously against the other hand several times. Note the reaction of water appearing on the surface of the soil. Squeeze the sample by closing the hand or pinching the soil between the fingers, and note the reaction as none, slow, or rapid in accordance with the criteria in Table I-E-1. The reaction is the speed with which water appears while shaking, and disappears while squeezing.

Table I-E-1: Criteria for Describing Dilatancy

Description	Criteria
None	No visible change in specimen.
Slow	Water appears slowly on the surface of the specimen during shaking and does not disappear or disappears slowly upon squeezing.
Rapid	Water appears quickly on the surface of the specimen during shaking and disappears quickly upon squeezing.

5.1.2.2 TOUGHNESS

Following the completion of the dilatancy test, shape the test specimen into an elongated pat and roll it by hand on a smooth surface or between the palms into a thread about 1/8 inch (3 mm) in diameter. (If the sample is too wet to roll easily, spread it into a thin layer and allow it to lose some water by evaporation.) Fold the sample threads and re-roll repeatedly until the thread crumbles at a diameter of about 1/8 inch. The thread will crumble at a diameter of 1/8 inch when the soil is near the plastic limit. Note the pressure required to roll the thread near the plastic limit. Also, note the strength of the thread. After the thread crumbles, lump the pieces together and knead it until the lump crumbles. Note the toughness of the material during kneading. Describe the toughness of the thread and lump as low, medium, or high in accordance with the criteria in Table I-E-2.

Table I-E-2: Criteria for Describing Toughness

Description	Criteria
Low	Only slight pressure is required to roll the thread near the plastic limit. The thread and the lump are weak and soft.
Medium	Medium pressure is required to roll the thread near the plastic limit. The thread and the lump have medium stiffness.
High	Considerable pressure is required to roll the thread near the plastic limit. The thread and the lump have very high stiffness.

DEFINITION OF TERMS

MAJOR DIVISIONS			SYMBOLS	TYPICAL DESCRIPTIONS
COARSE GRAINED SOILS More Than Half of Material is Larger Than No. 200 Sieve Size	GRAVELS More Than Half of Coarse Fraction is Smaller Than No. 4 Sieve	CLEAN GRAVELS (Less than 6% Fines)	GW	Well graded gravels, gravel-sand mixtures, little or no fines
			GP	Poorly graded gravels, gravel-sand mixtures, little or no fines
		GRAVELS With Fines	GM	Silty gravels, gravel-sand-silt mixtures, non-plastic fines
			GC	Clayey gravels, gravel-sand-clay mixtures, plastic fines
	SANDS More Than Half of Coarse Fraction is Smaller Than No. 4 Sieve	CLEAN SANDS (Less than 6% Fines)	SW	Well graded sands, gravelly sands, little or no fines
			SP	Poorly graded sands, gravelly sands, little or no fines
		SANDS With Fines	SM	Silty sands, sand-silt mixtures, non-plastic fines
			SC	Clayey sands, sand-clay mixtures, plastic fines
FINE GRAINED SOILS More Than Half of Material is Smaller Than No. 200 Sieve Size	SILTS AND CLAYS Liquid Limit is Less Than 50%		ML	Inorganic silts, rock flour, fine sandy silts or clays, and clayey silts with non- or slightly-plastic fines
			CL	Inorganic clays of low to medium plasticity, gravelly clays, silty clays, sandy clays, lean clays
			OL	Organic silts and organic silty clays of low plasticity
	SILTS AND CLAYS Liquid Limit is Greater Than 50%		MH	Inorganic silts, micaceous or diatomaceous fine sandy or silty soils, elastic silts, clayey silt
			CH	inorganic clays of high plasticity, fat clays
			OH	Organic clays of medium to high plasticity, organic silts
HIGHLY ORGANIC SOILS			PT	Peat and other highly organic soils

GRAIN SIZES

SILTS AND CLAYS	SAND			GRAVEL		COBBLES	BOULDERS
	FINE	MEDIUM	COARSE	FINE	COARSE		
200	40	10	4	3/4"	3"	12"	

U.S. STANDARD SERIES SIEVE — CLEAR SQUARE SIEVE OPENINGS

Figure I-E-1: Unclassified Soil Classification System (USCS)

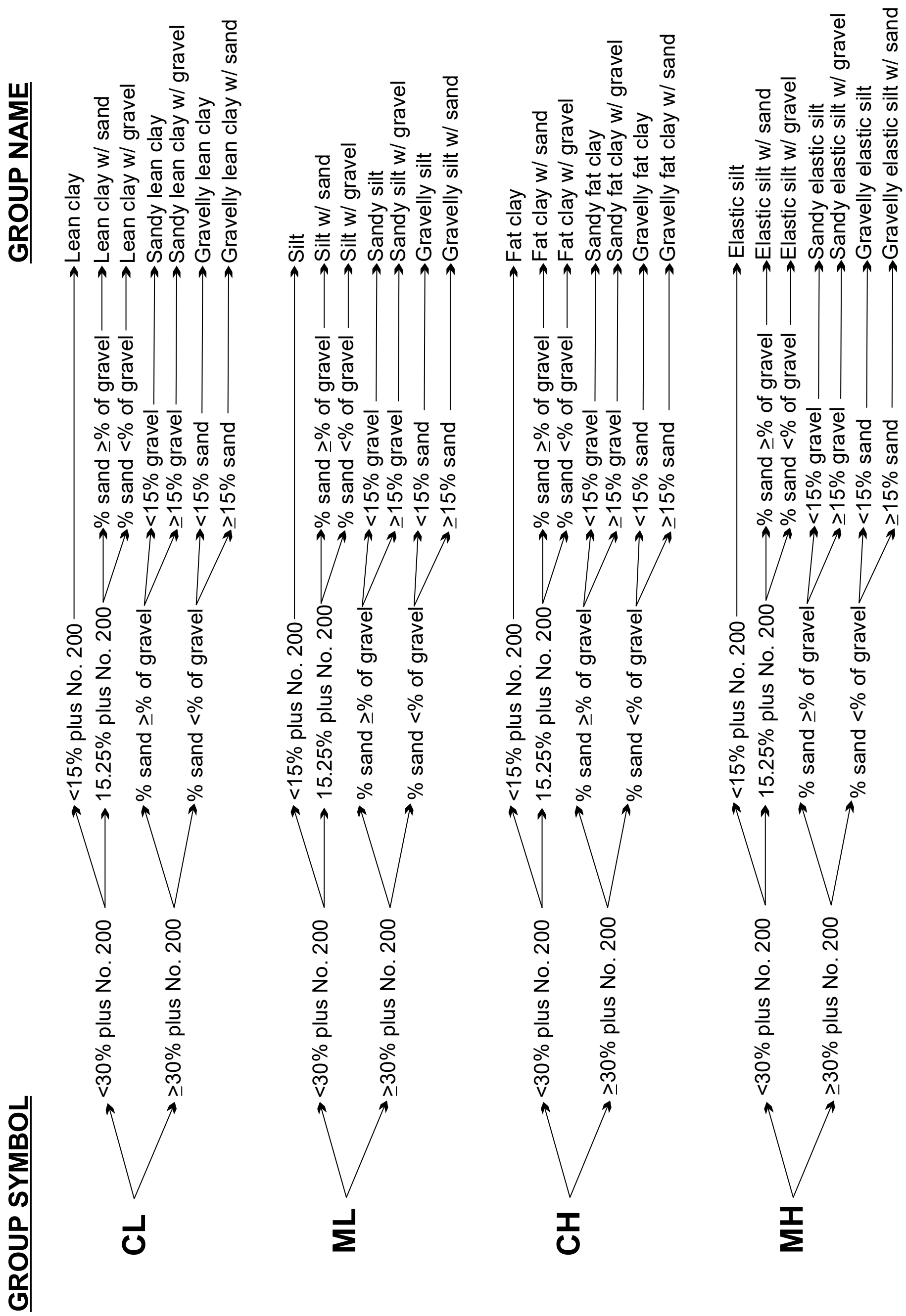


Figure I-E-2: Flow Chart for Fine Grain Soil Classification

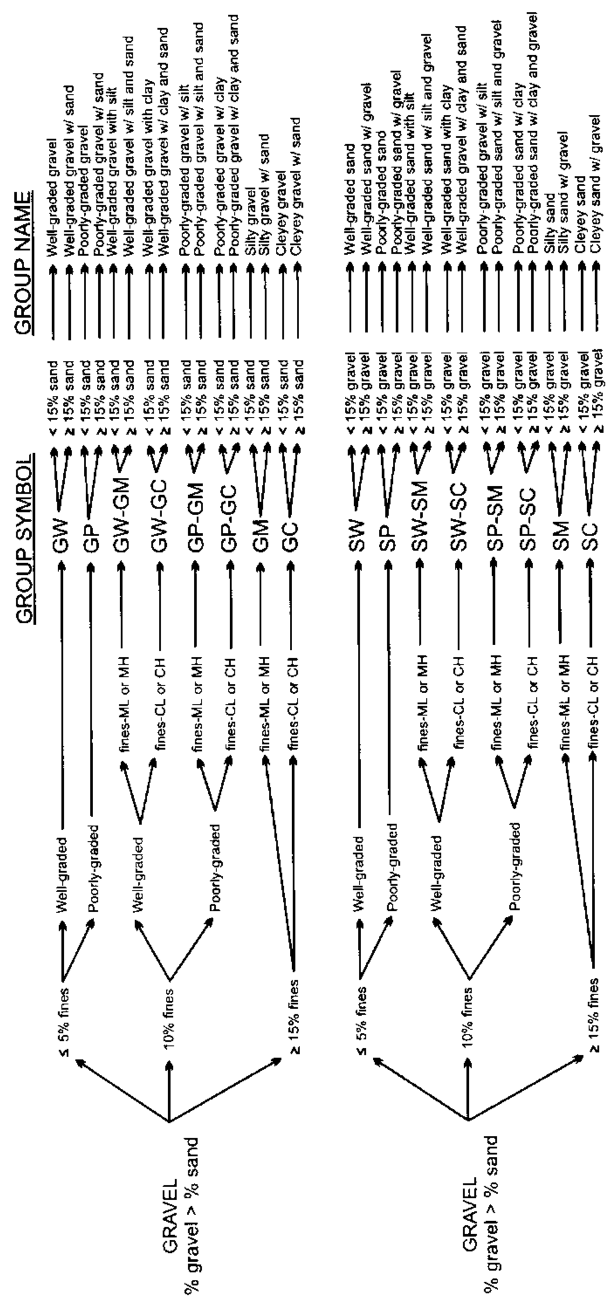


Figure I-E-3: Flow Chart for Soil with Gravel

5.1.2.3 PLASTICITY

The plasticity of a soil is defined by the ability of the soil to deform without cracking, the range of moisture content over which the soil remains in a plastic state, and the degree of cohesiveness at the plastic limit. The plasticity characteristic of clays and other cohesive materials is defined by the liquid limit and plastic limit. The liquid limit is defined as the soil moisture content at which soil passes from the liquid to the plastic state as moisture is removed. The test for the liquid limit is a laboratory, not a field, analysis.

The plastic limit is the soil moisture content at which a soil passes from the plastic to the semi-solid state as moisture is removed. The plastic limit test can be performed in the field and is indicated by the ability to roll a 1/8-inch (0.125-inch) diameter thread of fines, the time required to roll the thread, and the number of times the thread can be re-rolled when approaching the plastic limit.

The plasticity tests are not based on natural soil moisture content, but on soil that has been thoroughly mixed with water. If a soil sample is too dry in the field, add water prior to performing classification. If a soil sample is too sticky, spread the sample thin and allow it to lose some soil moisture.

Table I-E-3 presents the criteria for describing plasticity in the field using the rolled thread method.

Table I-E-3: Criteria for Describing Plasticity

Description	Criteria
Non-Plastic	A 1/8-inch thread cannot be rolled.
Low Plasticity	The thread can barely be rolled.
Medium Plasticity	The thread is easy to roll and not much time is required to reach the plastic limit.
High Plasticity	It takes considerable time rolling the thread to reach the plastic limit.

5.1.3 Angularity

The following criteria describe the angularity of the coarse sand and gravel particles:

- *Rounded* particles have smoothly-curved sides and no edges.
- *Subrounded* particles have nearly plane sides, but have well-rounded corners and edges.
- *Subangular* particles are similar to angular, but have somewhat rounded or smooth edgesand.
- *Angular* particles have sharp edges and relatively plane sides with unpolished surfaces. Freshly broken or crushed rock would be described as angular.

5.1.4 Color, Moisture, and Odor

The natural moisture content of soil is very important. Table I-E-4 shows the terms for describing the moisture condition and the criteria for each.

Table I-E-4: Soil Moisture Content Qualifiers

Qualifier	Criteria
Dry	Absence of moisture, dry to the touch
Moist	Damp but no visible water
Wet	Visible water, usually soil is below water table

Color is described by hue and chroma using the Munsell Soil Color Chart (Munsell 2000). For uniformity, all site geologists shall use this chart for soil classification. Doing so will facilitate correlation of geologic units between boreholes logged by different geologists The Munsell Color Chart is a small booklet of numbered color chips with names like “5YR 5/6, yellowish-red.” Note mottling or banding of colors. It is particularly important to note and describe staining because it may indicate contamination.

In general, wear a respirator if strong organic odors are present. If odors are noted, describe them if they are unusual or suspected to result from contamination. An organic odor may have the distinctive smell of decaying vegetation. Unusual odors may be related to hydrocarbons, solvents, or other chemicals in the subsurface. An organic vapor analyzer may be used to detect the presence of volatile organic contaminants.

5.1.5 In-Place Conditions

Describe the conditions of undisturbed soil samples in terms of their density/consistency (i.e., compactness), cementation, and structure utilizing the following guidelines:

5.1.5.1 DENSITY/CONSISTENCY

Density and consistency describe a physical property that reflects the relative resistance of a soil to penetration. The term “density” is commonly applied to coarse to medium-grained sediments (i.e., gravels, sands), whereas the term “consistency” is normally applied to fine-grained sediments (i.e., silts, clays). There are separate standards of measure for both density and consistency that are used to describe the properties of a soil.

The density or consistency of a soil is determined by observing the number of blows required to drive a 1 3/8-inch (35 mm) diameter split barrel sampler 18 inches using a drive hammer weighing 140 pounds (63.5 kilograms) dropped over a distance of 30 inches (0.76 meters). Record the number of blows required to penetrate each 6 inches of soil in the field boring log during sampling. The first 6 inches of penetration is considered to be a seating drive; therefore, the blow count associated with this seating drive is recorded, but not used in determining the soil density/consistency. The sum of the number of blows required for the second and third 6 inches of penetration is termed the “standard penetration resistance,” or the “N-value.” The observed number of blow counts must be corrected by an appropriate factor if a different type of sampling device (e.g., Modified California Sampler with liners) is used. For a 2 3/8-inch inner diameter Modified California Sampler equipped with brass or stainless steel liners and penetrating a cohesionless soil (sand/gravel), the N-value from the Modified California Sampler must be divided by 1.43 to provide data that can be compared to the 1 3/8-inch diameter sampler data.

For a cohesive soil (silt/clay), the N-value for the Modified California Sampler should be divided by a factor of 1.13 for comparison with 1 3/8-inch diameter sampler data.

Drive the sampler and record blow counts for each 6-inch increment of penetration until one of the following occurs:

- A total of 50 blows have been applied during any one of the three 6-inch increments; a 50-blow count occurrence shall be termed “refusal” and noted as such on the boring log.
- A total of 150 blows have been applied.
- The sampler is advanced the complete 18 inches without the limiting blow counts occurring, as described above.

If the sampler is driven less than 18 inches, record the number of blows per partial increment on the boring log. If refusal occurs during the first 6 inches of penetration, the number of blows will represent the N-value for this sampling interval. Table I-E-5 and Table I-E-6 present representative descriptions of soil density/consistency vs. N-values.

Table I-E-5: Measuring Soil Density with a California Sample – Relative Density (Sands, Gravels)

	Field Criteria (N-Value)	
Description	1 3/8 in. ID Sampler	2 in. ID Sampler using 1.43 factor
Very Loose	0–4	0–6
Loose	4–10	6–14
Medium Dense	10–30	14–43
Dense	30–50	43–71
Very Dense	>50	>71

Table I-E-6: Measuring Soil Density with a California Sampler – Fine Grained Cohesive Soil

	Field Criteria (N-Value)	
Description	1 3/8 in. ID Sampler	2 in. ID Sampler using 1.13 factor
Very Soft	0–2	0–2
Soft	2–4	2–4
Medium Stiff	4–8	4–9
Stiff	8–16	9–18
Very Stiff	16–32	18–36
Hard	>32	>36

For undisturbed fine-grained soil samples, it is also possible to measure consistency with a hand-held penetrometer. The measurement is made by placing the tip of the penetrometer against the surface of the soil contained within the sampling liner or shelby tube, pushing the penetrometer into the soil a distance specified by the penetrometer manufacturer, and recording the pressure resistance reading in pounds per square foot. The values are as follows (Table I-E-7):

Table I-E-7: Measuring Soil Consistency with a Hand-Held Penetrometer

Description	Pocket Penetrometer Reading (psf)
Very Soft	0–250
Soft	250–500
Medium Stiff	500–1,000
Stiff	1,000–2,000
Very Stiff	2,000–4,000
Hard	>4,000

Consistency can also be estimated using thumb pressure using Table I-E-8.

Table I-E-8: Measuring Soil Consistency Using Thumb Pressure

Description	Criteria
Very Soft	Thumb will penetrate soil more than 1 inch (25 mm)
Soft	Thumb will penetrate soil about 1 inch (25 mm)
Firm	Thumb will penetrate soil about 1/4 inch (6 mm)
Hard	Thumb will not indent soil but readily indented with thumbnail
Very Hard	Thumbnail will not indent soil

5.1.5.2 CEMENTATION

Cementation is used to describe the friability of a soil. Cements are chemical precipitates that provide important information as to conditions that prevailed at the time of deposition, or conversely, diagenetic effects that occurred following deposition. Seven types of chemical cements are recognized by Folk (1980). They are as follows:

1. Quartz – siliceous
2. Chert – chert-cemented or chalcedonic
3. Opal – opaline
4. Carbonate – calcitic, dolomitic, sideritic (if in doubt, calcareous should be used)
5. Iron oxides – hematitic, limonitic (if in doubt, ferruginous should be used)
6. Clay minerals – if the clay minerals are detrital or have formed by recrystallization of a previous clay matrix, they are not considered to be a cement. Only if they are chemical precipitates, filling previous pore space (usually in the form of accordion-like stacks or fringing radial crusts) should they be included as “kaolin-cemented,” “chlorite-cemented,” etc.
7. Miscellaneous minerals – pyritic, collophane-cemented, glauconite-cemented, gypsiferous, anhydrite-cemented, baritic, feldspar-cemented, etc.

The degree of cementation of a soil is determined qualitatively by utilizing finger pressure on the soil in one of the sample liners to disrupt the gross soil fabric. The three cementation descriptors are as follows:

1. Weak – friable; crumbles or breaks with handling or slight finger pressure
2. Moderate – friable; crumbles or breaks with considerable finger pressure
3. Strong – not friable; will not crumble or break with finger pressure

5.1.5.3 STRUCTURE

This variable is used to qualitatively describe physical characteristics of soil that are important to incorporate into hydrogeological and/or geotechnical descriptions of soil at a site. Appropriate soil structure descriptors are as follows:

- *Granular:* Spherically shaped aggregates with faces that do not accommodate adjoining faces
- *Stratified:* Alternating layers of varying material or color with layers at least 6 mm (1/4 inch) thick; note thickness
- *Laminated:* Alternating layers of varying material or color with layers less than 6 mm (1/4 inch) thick; note thickness
- Blocky: Cohesive soil that can be broken down into small angular or subangular lumps that resist further breakdown
- *Lensed:* Inclusion of a small pocket of different soil, such as small lenses of sand, should be described as homogeneous if it is not stratified, laminated, fissured, or blocky. If lenses of different soil are present, the soil being described can be termed homogeneous if the description of the lenses is included
- *Prismatic or Columnar:* Particles arranged about a vertical line, ped is bounded by planar, vertical faces that accommodate adjoining faces; prismatic has a flat top; columnar has a rounded top
- *Platy:* Particles are arranged about a horizontal plane

5.1.5.4 OTHER FEATURES

- *Mottled:* Soil that appears to consist of material of two or more colors in blotchy distribution
- *Fissured:* Breaks along definite planes of fracture with little resistance to fracturing (determined by applying moderate pressure to sample using thumb and index finger)
- *Slickensided:* Fracture planes appear polished or glossy, sometimes striated (parallel grooves or scratches)

5.1.6 Development of Soil Description

Develop standard soil descriptions according to the following examples. There are three principal categories under which all soil can be classified. They are described below.

5.1.6.1 COARSE-GRAINED SOIL

Coarse-grained soil is divided into sands and gravels. A soil is classified as a sand if over 50 percent of the coarse fraction is “sand-sized.” It is classified as a gravel if over 50 percent of the coarse fraction is composed of “gravel-sized” particles.

The written description of a coarse-grained soil shall contain, in order of appearance: Typical name including the second highest percentage constituent as an adjective, if applicable (underlined); grain size of coarse fraction; Munsell color and color number; moisture content; relative density; sorting; angularity; other features, such as stratification (sedimentary structures) and cementation, possible formational name, primary USCS classification, secondary USCS classification (when necessary), and approximate percentages of minor constituents (i.e., sand, gravel, shell fragments, rip-up clasts) in parentheses.

Example: POORLY SORTED SAND WITH SILT, medium- to coarse-grained, light olive gray, 5Y 6/2, saturated, loose, poorly sorted, subrounded clasts, SW/SM (minor silt with approximately 20 percent coarse-grained sand-sized shell fragments, and 80 percent medium-grained quartz sand, and 5 percent to 15 percent ML).

5.1.6.2 *Fine-grained Soil*

Fine-grained soil is further subdivided into clays and silts according to its plasticity. Clays are rather plastic, while silts have little or no plasticity.

The written description of a fine-grained soil should contain, in order of appearance: Typical name including the second highest percentage constituent as an adjective, if applicable (underlined); Munsell color; moisture content; consistency; plasticity; other features, such as stratification, possible formation name, primary USCS classification, secondary USCS classification (when necessary), and the percentage of minor constituents in parentheses.

Example: SANDY LEAN CLAY, dusky red, 2.5 YR 3/2, moist, firm, moderately plastic, thinly laminated, CL (70 percent fines, 30 percent sand, with minor amounts of disarticulated bivalves [about 5 percent]).

5.1.6.3 *Organic Soil*

For highly organic soil, describe the types of organic materials present as well as the type of soil constituents present using the methods described above. Identify the soil as an organic soil, OL/OH, if the soil contains enough organic particles to influence the soil properties. Organic soil usually has a dark brown to black color and may have an organic odor. Often, organic soils will change color, (e.g., from black to brown) when exposed to air. Some organic soils will lighten in color significantly when air-dried. Organic soils normally will not have a high toughness or plasticity. The thread for the toughness test will be spongy.

Example: ORGANIC CLAY, black, 2.5Y, 2.5/1, wet, soft, low plasticity, organic odor, OL (100 percent fines), weak reaction to HCl.

5.2 Rock Classification

The purpose of rock classification is to thoroughly describe the physical and mineralogical characteristics of a specimen and to classify it according to an established system. The generalized rock classification system described below was developed for the NAVFAC Pacific ER Program because, unlike the USCS for soils, there is no universally accepted rock classification system. In some instances, a more detailed and thorough rock classification system may be appropriate. Any modifications to this classification system, or the use of an alternate classification system should be considered during preparation of the site work plan. Both the CTO Manager and the QA Manager or

Technical Director must approve any modifications to this classification system, or the use of another classification system.

Describing rock specimens on a common basis is essential so that rocks described by different site geologists are comparable. Site geologists describing rock specimens as a part of investigative activities must use the classification system described herein, or if necessary, another more detailed classification system. Use of a common classification system provides the most useful geologic database for all present and future subsurface investigations and remedial activities at NAVFAC Pacific ER Program sites.

A rock classification template has been designated as shown in Figure I-E-4 to provide a more consistent rock classification between geologists. The template includes the classification of rocks by origin and mineralogical composition. When classifying rocks, all site geologists shall use this template.

The site geologist shall describe the rock specimen and record the description in a borehole log or logbook. The items essential for classification include:

- Classification Name (i.e., schist)
- Color
- Mineralogical composition and percent
- Texture/Grain size (i.e., fine-grained, pegmatitic, aphanitic, glassy)
- Structure (i.e., foliated, fractured, lenticular)
- Rock Quality Designation (sum of all core pieces greater than two times the diameter of the core divided by the total length of the core run, expressed as a percentage)
- Classification symbol (i.e., MF)

Example: Metamorphic foliated schist: Olive gray, 5Y, 3/2, Garnet 25 percent, Quartz 45 percent, Chlorite 15 percent, Tourmaline 15 percent, Fine-grained with Pegmatite garnet, highly foliated, slightly wavy, MF.

6. Records

Document soil classification information collected during soil sampling onto the field boring logs, field trench logs, and into the field notebook. Procedure I-B-1, *Soil Sampling* presents copies of the field boring log form. Copies of this information shall be placed in the project files.

7. Health and Safety

Field Personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

Folk, Robert L. 1980. *Petrology of Sedimentary Rocks*. Austin, TX: Hemphill Publishing Company.

Munsell Color Company (Munsell). 2009. *Munsell Soil Color Chart*, (Revised). Baltimore.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-B-1, *Soil Sampling.*

9. Attachments

None.

DEFINITION OF TERMS					
PRIMARY DIVISIONS			SYMBOLS		SECONDARY DIVISIONS
SEDIMENTARY ROCKS	Clastic Sediments	CONGLOMERATE		CG	Coarse-grained Clastic Sedimentary Rock types including: Conglomerates and Breccias
		SANDSTONE		SS	Clastic Sedimentary Rock types including: Sandstone, Arkose and Greywacke
		SHALE		SH	Fine-grained Clastic Sedimentary Rock types including: Shale, Siltstone, Mudstone and Claystone
	Chemical Precipitates	CARBONATES		LS	Chemical Precipitates including: Limestone, Crystalline Limestone, Fossiliferous Limestone Micrite and Dolomite
		EVAPORITES		EV	Evaporites including: Anhydrite, Gypsum, Halite, Travertine and Caliche
IGNEOUS ROCKS		EXTRUSIVE (Volcanic)		IE	Volcanic Rock types including: Basalt, Andesite, Rhyolite, Volcanic Tuff, and Volcanic Breccia
		INTRUSIVE (Plutonic)		II	Plutonic Rock types including: Granite, Diorite and Gabbro
METAMORPHIC ROCKS		FOLIATED		MF	Foliated Rock types including: Slate, Phyllite, Schist and Gneiss
		NON-FOLIATED		MN	Non-foliated Rock types including: Metaconglomerate, Quartzite and Marble

Figure I-E-4: Rock Classification System

Equipment Decontamination

1. Purpose

This standard operating procedure describes methods of equipment decontamination for use during site activities by United States (U.S.) Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific personnel.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

None.

4. Responsibilities

The prime contractor CTO Manager is responsible for identifying instances of non-compliance with this procedure and ensuring that decontamination activities comply with this procedure. The CTO Manager is responsible for ensuring that all personnel involved in equipment decontamination have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager is responsible for field oversight to ensure that all project field staff follow these procedures.

Field personnel are responsible for the implementation of this procedure.

5. Procedures

Decontamination of equipment used in sampling of various media, groundwater monitoring, and well drilling and development is necessary to prevent cross-contamination and to maintain the highest integrity possible in collected samples. Planning a decontamination program requires consideration of the following factors:

- The location where the decontamination procedures will be conducted
- The types of equipment requiring decontamination
- The frequency of equipment decontamination
- The cleaning technique and types of cleaning solutions appropriate for the contaminants of concern
- The method for containing the residual contaminants and wash water from the decontamination process
- The use of a quality control measure to determine the effectiveness of the decontamination procedure

The following subsection describes standards for decontamination, including the frequency of decontamination, cleaning solutions and techniques, containment of residual contaminants and cleaning solutions, and effectiveness.

5.1 DECONTAMINATION AREA

Select an appropriate location for the decontamination area at a site based on the ability to control access to the area, the ability to control residual material removed from equipment, the need to store clean equipment, and the ability to restrict access to the area being investigated. Locate the decontamination area an adequate distance away and upwind from potential contaminant sources to avoid contamination of clean equipment.

It is the responsibility of the site safety and health officer (SSHO) to set up the site zones (i.e., exclusion, transition, and clean) and decontamination areas. Generally, the decontamination area is located within the transition zone, upwind of intrusive activities, and serves as the washing area for both personnel and equipment to minimize the spread of contamination into the clean zone. For equipment, a series of buckets are set up on a visqueen-lined bermed area. Separate spray bottles containing laboratory-grade isopropyl alcohol (or alternative cleaning solvent as described in the CTO work plan [WP]) and distilled water are used for final rinsing of equipment. Depending on the nature of the hazards and the site location, decontamination of heavy equipment, such as augers, pump drop pipe, and vehicles, may be accomplished using a variety of techniques.

5.2 TYPES OF EQUIPMENT

Drilling equipment that must be decontaminated includes drill bits, auger sections, drill-string tools, drill rods, split barrel samplers, tremie pipes, clamps, hand tools, and steel cable. Decontamination of monitoring well development and groundwater sampling equipment includes submersible pumps, bailers, interface probes, water level meters, bladder pumps, airlift pumps, peristaltic pumps, and lysimeters. Other sampling equipment that requires decontamination includes, but is not limited to, hand trowels, hand augers, slide hammer samplers, shovels, stainless-steel spoons and bowls, soil sample liners and caps, wipe sampling templates, composite liquid waste samplers, and dippers. However, equipment that is shipped pre-packaged from the vendor should not have to be decontaminated prior to first use. Equipment with a porous surface, such as rope, cloth hoses, and wooden blocks, cannot be thoroughly decontaminated and shall be properly disposed of after one use.

5.3 FREQUENCY OF EQUIPMENT DECONTAMINATION

Decontaminate down-hole drilling equipment and equipment used in monitoring well development and purging prior to initial use and between each borehole or well. Down-hole drilling equipment, however, may require more frequent cleaning to prevent cross-contamination between vertical zones within a single borehole. When drilling through a shallow contaminated zone and installing a surface casing to seal off the contaminated zone, decontaminate the drilling tools prior to drilling deeper. Initiate groundwater sampling by sampling groundwater from the monitoring well where the least contamination is suspected. Decontaminate groundwater, surface water, and soil sampling devices prior to initial use and between collection of each sample to prevent the possible introduction of contaminants into successive samples.

5.4 CLEANING SOLUTIONS AND TECHNIQUES

Decontamination can be accomplished using a variety of techniques and fluids. The preferred method of decontaminating major equipment, such as drill bits, augers, drill string, and pump drop-pipe, is steam cleaning. To steam clean, use a portable, high-pressure steam cleaner equipped with a pressure hose and fittings. For this method, thoroughly steam wash equipment, and rinse it with potable tap water to remove particulates and contaminants.

Where appropriate, disposable materials are recommended. A rinse decontamination procedure is acceptable for equipment, such as bailers, water level meters, new and re-used soil sample liners, and hand tools. The decontamination procedure shall consist of the following: (1) wash with a non-phosphate detergent (alconox, liquinox, or other suitable detergent) and potable water solution; (2) rinse in a bath with potable water; (3) spray with laboratory-grade isopropyl alcohol; (4) rinse in a bath with deionized or distilled water; and (5) spray with deionized or distilled water. If possible, disassemble equipment prior to cleaning. Add a second wash at the beginning of the process if equipment is very soiled.

Decontaminating submersible pumps requires additional effort because internal surfaces become contaminated during usage. Decontaminate these pumps by washing and rinsing the outside surfaces using the procedure described for small equipment or by steam cleaning. Decontaminate the internal surfaces by recirculating fluids through the pump while it is operating. This recirculation may be done using a relatively long (typically 4 feet) large-diameter pipe (4-inch or greater) equipped with a bottom cap. Fill the pipe with the decontamination fluids, place the pump within the capped pipe, and operate the pump while recirculating the fluids back into the pipe. The decontamination sequence shall include: (1) detergent and potable water; (2) potable water rinse; (3) potable water rinse; and (4) deionized water rinse. Change the decontamination fluids after each decontamination cycle.

Solvents other than isopropyl alcohol may be used, depending upon the contaminants involved. For example, if polychlorinated biphenyls or chlorinated pesticides are contaminants of concern, hexane may be used as the decontamination solvent. However, if samples are also to be analyzed for volatile organics, hexane shall not be used. In addition, some decontamination solvents have health effects that must be considered. Decontamination water shall consist of distilled or deionized water. Steam-distilled water shall not be used in the decontamination process as this type of water usually contains elevated concentrations of metals. Decontamination solvents to be used during field activities will be specified in CTO WP and site-specific health and safety plan.

Rinse equipment used for measuring field parameters, such as pH, temperature, specific conductivity, and turbidity with deionized or distilled water after each measurement. Also wash new, unused soil sample liners and caps with a fresh detergent solution and rinse them with potable water followed by distilled or deionized water to remove any dirt or cutting oils that might be on them prior to use.

5.5 CONTAINMENT OF RESIDUAL CONTAMINANTS AND CLEANING SOLUTIONS

A decontamination program for equipment exposed to potentially hazardous materials requires a provision for catchment and disposal of the contaminated material, cleaning solution, and wash water.

When contaminated material and cleaning fluids must be contained from heavy equipment, such as drilling rigs and support vehicles, the area must be properly floored, preferably with a concrete pad that slopes toward a sump pit. If a concrete pad is impractical, planking can be used to construct solid flooring that is then covered by a nonporous surface and sloped toward a collection sump. If the decontamination area lacks a collection sump, use plastic sheeting and blocks or other objects to create a bermed area for collection of equipment decontamination water. Situate items, such as auger flights, which can be placed on metal stands or other similar equipment, on this equipment during decontamination to prevent contact with fluids generated by previous equipment decontamination. Store clean equipment in a separate location to prevent recontamination. Collect decontamination fluids contained within the bermed area and store them in secured containers as described below.

Use wash buckets or tubs to catch fluids from the decontamination of lighter-weight drilling equipment and hand-held sampling devices. Collect the decontamination fluids and store them on site in secured containers, such as U.S. Department of Transportation-approved drums, until their disposition is determined by laboratory analytical results. Label containers in accordance with Procedure I-A-6, *Investigation-Derived Waste Management*.

5.6 EFFECTIVENESS OF DECONTAMINATION PROCEDURES

A decontamination program must incorporate quality control measures to determine the effectiveness of cleaning methods. Quality control measures typically include collection of equipment blank samples or wipe testing. Equipment blanks consist of analyte-free water that has been poured over or through the sample collection equipment after its final decontamination rinse. Wipe testing is performed by wiping a cloth over the surface of the equipment after cleaning. Procedure III-B, *Field QC Samples (Water, Soil)* provides further descriptions of these samples and their required frequency of collection. These quality control measures provide "after-the fact" information that may be useful in determining whether or not cleaning methods were effective in removing the contaminants of concern.

6. Records

Describe the decontamination process in the field logbook.

7. Health and Safety

Field Personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-A-6, *Investigation-Derived Waste Management.*

Procedure III-B, *Field QC Samples (Water, Soil).*

9. Attachments

None.

Direct-Push Sampling Techniques

1. Purpose

This standard operating procedure provides guidance on the use of direct-push techniques for the United States Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

3.1 Direct-Push Techniques

Direct-push techniques are methods for subsurface sampling or monitoring that involve the application of downward pressure (usually supplied through hydraulic means) without the benefit of cutting tool rotation to enter soil or rock. A variety of systems are available under several trade names, such as Geoprobe and Strataprobe. Equipment may be skid-mounted, trailered, or mounted directly on the frame of a vehicle.

3.2 Membrane Interface Probe (MIP)

The membrane interface probe (MIP) is a continuous sampling tool advanced through the soil using a direct-push machine to log contaminant and lithologic data in real-time. A semipermeable membrane on the probe is heated to a temperature of 100 to 120 degrees Celsius. Clean carrier gas is circulated across the internal surface of the membrane carrying volatile organic contaminants, which have diffused through the membrane, to the surface for analysis by gas phase detectors. The MIP system is a timely and cost effective way to delineate volatile organic contaminants (e.g., benzene, toluene, solvents, trichloroethylene, tetrachloroethylene) with depth. The MIP provides real-time semi-quantitative measurements that can be used for optimizing the selection of sampling locations, particularly when using a dynamic work plan. By identifying the depth at which a contaminant is located, a more representative sample of soil or water can be collected. Correlation of a series of MIP logs across a site can provide 2-D and 3-D definition of the contaminant plume. When lithologic data are obtained (electrical conductivity, cone penetration test, hydraulic profiling tool, etc.) with the MIP data, contaminant migration pathways may be defined. The MIP logs provide a detailed record of contaminant distribution in the saturated and unsaturated formations. The MIP system does not provide specificity of analytes; however, it does use three different gas detectors. These detectors are a flame ionization detector, a photoionization detector, and a version of the electron capture detector. These three detectors allow the investigator to differentiate between certain classes of volatile contaminants such as petroleum fuels and chlorinated solvents. Soil and/or water samples must be collected and analyzed by a laboratory to identify specific analytes and quantitative concentrations. Only volatile organic compounds (VOCs) are detected by the MIP system. Detection limits are subject to the selectivity of the gas detector and the characteristics of the formation being penetrated (e.g., clay and organic carbon content) (ASTM 2012).

3.3 Laser-Induced Fluorescence (LIF) Tool

Laser-induced fluorescence (LIF) tools use the rapid emission of light from an atom or molecule after it has absorbed radiation from collimated and polarized monochromatic light source. LIF is a method for delineating the subsurface location of non-aqueous phase liquid (NAPL) petroleum hydrocarbons and other hydrocarbons using a fiber optic-based laser-induced fluorescence sensor system. The LIF tool uses a technique in which a laser emits pulsed ultraviolet light. The laser, mounted on the cone penetrometer platform, is linked via fiber optic cables to a window mounted on the side of a penetrometer probe. Laser energy emitted through the window causes fluorescence in adjacent contaminated media. The fluorescent radiation is transmitted to the surface via fiber optic cables for real-time spectral data acquisition and spectral analysis on the platform.

The LIF sensor responds to any material that fluoresces when excited by ultraviolet wavelengths produced by the laser, primarily the polynuclear aromatic, aromatic, and substituted hydrocarbons, along with a few heterocyclic hydrocarbons. The excitation energy causes all encountered fluorophores to fluoresce, including some minerals and some non-petroleum organic matter. However, because the sensor collects full spectral information, discrimination among the fluorophores may be accomplished by using the spectral features associated with the data. Soil samples should be taken to verify recurring spectral signatures to discriminate between fluorescing petroleum hydrocarbons and naturally occurring fluorophores.

3.4 Hydraulic Profiling Tool (HPT)

The hydraulic profiling tool (HPT) is a logging tool that can be used with LIF or MIP tools to better understand the details of soil permeability. The HPT measures the pressure required to inject a flow of water into the soil as the probe is advanced into the subsurface with a direct-push rig. The resulting injection pressure log is an indicator of formation permeability, which can be used to better understand contaminant mobility and migration.

4. Responsibilities

The prime contractor CTO Manager is responsible for ensuring that these standard direct-push technique procedures are followed during projects conducted under the ER Program and that a qualified individual conducts or supervises the projects. A qualified individual for subsurface sampling or monitoring using direct-push techniques is defined as a person with a degree in geology, hydrogeology, or geotechnical/civil engineering with at least 1 year of experience supervising soil boring construction using conventional drilling or direct-push techniques. The CTO Manager is responsible for ensuring that all personnel involved in direct-push sampling techniques have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager is responsible for ensuring that all project field staff follow these procedures.

Field personnel are responsible for the implementation of this procedure.

5. Procedures

Direct-push techniques may be used as a cost-effective alternative to conventional drilling techniques for obtaining subsurface soil and groundwater samples and for monitoring subsurface conditions.

5.1 Method Selection

Base the decision to use direct-push techniques on: (1) their ability to achieve the required information at the required level of quality control and (2) their cost-effectiveness compared to conventional drilling methods. Major limitations of direct-push techniques are their inability to penetrate rock or cobbles and sometimes a shallow maximum depth of penetration. The capabilities of direct-push systems vary significantly among vendors. Consider these differences in capabilities when evaluating the method for a subsurface exploration program.

Use direct-push techniques to obtain groundwater samples for confirmatory analyses only if the screen placement method protects the screen from clogging during installation and allows the installation of a sand-pack around the exterior of the well screen. If semi-quantitative groundwater data is needed for screening purposes, direct-push tools are the best way to acquire that information.

The MIP can be effective in locating zones where dense nonaqueous phase liquids (DNAPL) may be present as well as dissolved phase concentrations of around 1 mg/L.

The LIF tool can provide accurate information on the location and characteristics of the contaminants encountered in the vadose zone and the saturated zone. Direct-push LIF is limited to soils that can be penetrated with the available equipment. The ability to penetrate strata is based on carrying vehicle weight, density of soil, and consistency of soil. Penetration may be limited by the delicacy of the window in the tool which can be damaged in certain ground conditions (ASTM 1997).

5.2 Inspection of Equipment

Inspect direct-push equipment prior to use for signs of fluid leakage, which could introduce contaminants to the soil. If at any time during equipment operation, fluid is observed leaking from the rig, cease operations and immediately repair or contain the leak. Collect, containerize, and label soil and other materials affected by the leak for proper disposal (Procedure I-A-6, *Investigation-Derived Waste Management*).

5.3 Preparation of Work Site

Inspect the work site prior to commencing operations to ensure that no overhead hazards exist that could impact the direct-push equipment. In addition, clear locations planned for subsurface exploration using geophysical methods, and hand excavate them to a depth of 2 to 3 feet prior to soil penetration, unless it is certain (by virtue of subsurface clearing activities) that no utilities or other hazardous obstructions will be encountered in the first 2 to 3 feet (Procedure I-B-2, *Geophysical Testing*). Hand excavation may be waived when it is not practical.

Locate the direct-push rig so that it is downslope from the penetration point, if the work is to be performed on a grade. Locate the rig downwind or crosswind of the penetration point, if possible. Cover the area surrounding, and in the vicinity of, the penetration point with plastic. Establish required exclusion zones using plastic tape or cones to designate the various areas.

5.4 Equipment Decontamination

Thoroughly decontaminate equipment used for direct-push exploration and sampling in accordance with Procedure I-F, *Equipment Decontamination*, to avoid cross-contamination. Decontaminate sampling tools and downhole equipment between each sampling event and between penetration points. At a minimum, steam clean or wash and rinse the equipment. Collect, containerize, and label all wash and rinse water for proper disposal. Clean equipment (e.g., drive rods and samplers) shall not come into contact with contaminated soils or other contaminated materials. Keep equipment on plastic or protect it in another suitable fashion. Store push rods and other equipment removed from a hole on plastic sheeting until properly decontaminated.

5.5 Soil Sampling

Vendors of direct-push equipment offer a variety of sampling systems designed specifically for their equipment. Both continuous and discreet soil samples may be obtained using sampling equipment similar to that described in Procedure I-B-1, *Soil Sampling*. The preferred methods for soil sampling using direct-push techniques use brass or stainless steel split-tube samplers that are driven through the horizon to be sampled. Disposable polytetrafluoroethylene or acetate sleeves may also be used. However, if the liner appears melted or otherwise damaged upon retrieval from the borehole, do not use for collecting samples that are to be analyzed for VOCs or SVOCs.

5.6 Groundwater Sampling

Direct-push vendors offer numerous methods for obtaining groundwater samples. Key differences among methods involve: (1) the maximum well diameter achievable; (2) the ability to protect the well screen from exposure to contaminated overburden soils during installation; (3) the ability to install filter packing around the screen; (4) flexibility in the size, materials of construction, and design of well screens; and (5) the ability to convert sampling points into permanent monitoring wells. The limitations and abilities of a given system must be thoroughly understood and matched to the needs of the project before committing to the collection of groundwater samples using direct-push techniques.

Use direct-push techniques only to collect screening samples unless it is confirmed that the system:

1. Effectively protects the well screen from exposure to contaminated overburden soils during installation
2. Allows the installation of effective packing around the well screen
3. Allows the well screen to be effectively sealed against the downward infiltration of overlying groundwater or surface precipitation

4. Is constructed of materials compatible with the intended sampling and analysis goals of the project
5. Allows the use of a well screen properly sized and slotted for the needs of the project

Additional information on the collection of groundwater samples can be found in Procedures I-C-1, *Monitoring Well Installation and Abandonment*, I-C-2, *Monitoring Well Development*, and I-C-3, *Monitoring Well Sampling.*

It is the responsibility of the CTO Manager to evaluate and determine the appropriateness of direct-push systems prior to committing to their use on any project involving groundwater sampling. As part of this evaluation, it is recommended to obtain concurrence from regulatory authorities in advance for the method selection.

5.7 BOREHOLE ABANDONMENT

Methods for abandoning boreholes created with direct-push systems will vary among vendors. Coordinate the desired method for abandonment with the vendor in the planning stages of the project to ensure proper abandonment.

Some direct-push boreholes will close naturally as the drive rods and sampling tools are withdrawn. This may occur in loose, unconsolidated soils, such as sands. Close all boreholes using one of the procedures described in this procedure, unless natural caving precludes such closure.

The three methods for closing direct-push boreholes are:

1. Add granulated or pelletized bentonite and hydrate in layers, proceeding from the bottom of the hole to the surface.
2. Pour premixed cement/water (or cement/water/bentonite) mixture into the hole.
3. Fill the entire hole with granular or pelletized bentonite and hydrate by means of a previously emplaced water tube that is gradually withdrawn as water is supplied to the bentonite.

The second method is recommended. For shallow holes less than 10 feet in depth, pour a cement/water/bentonite mix directly into the opening using a funnel. For deeper holes, use a conductor (tremie) pipe to carry the grout mix to the far reaches of the borehole. Lower the conductor pipe to within 2 inches of the bottom and gradually withdraw it as grout is added, keeping the lower end of the pipe submerged in grout at all times.

The recommended grout mixture for well abandonment is 7 to 9 gallons of water per 94-pound bag of Portland cement, with 3 percent to 5 percent by weight of powdered bentonite added to the mixture. Commercial products, such as Volcay are acceptable with pre-approval of the CTO Manager and the QA Manager or Technical Director.

Seal boreholes to within 0.5 to 2.0 feet of the surface. Inspect the abandoned borehole after 24 hours to ensure that grout shrinkage does not occur. If significant shrinkage has occurred, re-grout the borehole. Fill the remaining portion of the hole with local topsoil or appropriate paving materials.

6. Records

Document soil classification information collected during soil sampling onto borehole log forms (see Procedure I-B-1, *Soil Sampling*). Fill out all logs with indelible ink. Record information about sampling activities on sample log forms or in the field logbook. Send copies of this information to the CTO Manager and to the project files.

7. Health and Safety

Field personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

ASTM International (ASTM). 1997. *Standard Practice for Cone Penetrometer Technology Characterization of Petroleum Contaminated Sites with Nitrogen Laser-Induced Fluorescence*. D6187-97 (Reapproved 2012). West Conshohocken, PA.

———. 2007. *Standard Practice for Direct Push Technology for Volatile Contaminant Logging with the Membrane Interface Probe (MIP)*. D7352-07 (Reapproved 2012). West Conshohocken, PA.

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-A-6, *Investigation-Derived Waste Management.*

Procedure I-A-7, *Analytical Data Validation Planning and Coordination.*

Procedure I-B-1, *Soil Sampling.*

Procedure I-B-2, *Geophysical Testing.*

Procedure I-C-1, *Monitoring Well Installation and Abandonment.*

Procedure I-F, *Equipment Decontamination.*

9. Attachments

None.

Land Surveying

1. Purpose

This standard operating procedure sets forth protocols for acquiring land surveying data to facilitate the location and mapping of geologic, hydrologic, geotechnical data, and analytical sampling points and to establish topographic control over project sites for use by United States (U.S.) Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific personnel.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the *Uniform Federal Policy-Quality Assurance Project Plan* (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

3.1 Boundary Survey

Boundary surveys are conducted by Certified Land Surveyors in order to delineate a legal property line for a site or section of a site.

3.2 Global Positioning System (GPS)

A GPS is a system of satellites, computers, and receivers that is able to determine the latitude and longitude of a receiver on Earth by calculating the time difference for signals from different satellites to reach the receiver.

3.3 Waypoint

A waypoint is a reference point or set of coordinates that precisely identify a location.

4. Responsibilities

The prime contractor CTO Manager is responsible for determining the appropriate land surveying protocols for the project and ensuring this procedure is properly implemented. The CTO Manager is responsible for ensuring that all personnel involved in land surveying shall have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Field Manager (FM) is responsible for ensuring that the appropriate protocols are conducted according to this procedure and the project-specific sampling plan. In virtually all cases, subcontractors will conduct these procedures. The FM is responsible for overseeing the activities of the subcontractor and ensuring that sampling points and topographic features are properly surveyed.

Field personnel are responsible for the implementation of this procedure.

5. Procedures

5.1 Theodolite/Electronic Distance Measurement (EDM)

Follow the procedures listed below during theodolite/EDM land surveying conducted under the NAVFAC Pacific ER Program:

- A land surveyor registered in the state or territory in which the work is being performed shall directly supervise all surveying work.
- An authorized manufacturer's representative shall inspect and calibrate survey instruments in accordance with the manufacturer's specifications regarding procedures and frequencies. At a minimum, instruments shall be calibrated no more than 6 months prior to the start of the survey work.
- Standards for all survey work shall be in accordance with National Oceanic and Atmospheric Administration standards and, at a minimum, with accuracy standards set forth below. The horizontal accuracy for the location of all grid intersection and planimetric features shall be (±) 0.1 feet. The horizontal accuracy for boundary surveys shall be 1 in 10,000 feet (1:10,000). The vertical accuracy for ground surface elevations shall be (±) 0.1 feet. Benchmark elevation accuracy and elevation of other permanent features, including monitoring wellheads, shall be (±) 0.01 feet.
- Reference surveys to the local established coordinate systems, and base all elevations and benchmarks established on U.S. Geological Survey datum, 1929 general adjustment.
- Reference surveyed points to mean sea level (lower low water level).
- Jointly determine appropriate horizontal and vertical control points prior to the start of survey activities. If discrepancies in the survey (e.g., anomalous water level elevations) are observed, the surveyor may be required to verify the survey by comparison to a known survey mark. If necessary, a verification survey may be conducted by a qualified third party.
- All field notes, sketches, and drawings shall clearly identify the horizontal and vertical control points by number designation, description, coordinates, and elevations. Map all surveyed locations using a base map or other site mapping, as specified by the CTO Manager.
- Begin and end all surveys at the designated horizontal and vertical control points to determine the degree of accuracy of the surveys.

- Iron pins used to mark control points shall be made of reinforcement steel or an equivalent material and shall be 18 inches long with a minimum diameter of 5/8 inch. Drive pins to a depth of 18 inches into the soil.
- Stakes used to mark survey lines and points shall be made from 3-foot lengths of 2-inch by 2-inch lumber and pointed at one end. Clearly mark them with brightly colored weatherproof flagging and biodegradable paint.
- Clearly mark the point on a monitoring well casing that is surveyed by filing grooves into the casing on either side of the surveyed point.

5.2 GLOBAL POSITIONING SYSTEM (GPS) TO CONDUCT LAND SURVEY

Follow the procedures listed below during GPS land surveying conducted under the NAVFAC Pacific ER Program:

- A land surveyor registered in the state or territory in which the work is being performed shall directly supervise all surveying work.
- An authorized manufacturer's representative shall inspect and calibrate survey instruments in accordance with the manufacturer's specifications regarding procedures and frequencies. At a minimum, instruments shall be calibrated no more than 6 months prior to the start of the survey work.
- Standards for all survey work shall be in accordance with National Oceanic and Atmospheric Administration standards and, at a minimum, with accuracy standards set forth below. The horizontal accuracy for the location of all grid intersection and planimetric features shall be (±) 0.1 feet. The horizontal accuracy for boundary surveys shall be 1 in 10,000 feet (1:10,000). The vertical accuracy for ground surface elevations shall be (±) 0.1 feet. Benchmark elevation accuracy and elevation of other permanent features, including monitoring wellheads, shall be (±) 0.01 feet. Accuracy requirements shall be specified in the project work plan (WP).
- Reference surveys to the local established coordinate systems, and base all elevations and benchmarks established on U.S. Geological Survey datum, 1929 general adjustment.
- All field notes, sketches, and drawings shall clearly identify the horizontal and vertical control points by number designation, description, coordinates, and elevations. Map all surveyed locations using a base map or other site mapping, as specified in the project WP.
- Begin and end all surveys at the designated horizontal and vertical control points (as applicable) to determine the degree of accuracy of the surveys.
- Iron pins used to mark control points shall be made of reinforcement steel or an equivalent material and shall be 18 inches long with a minimum diameter of 5/8 inch. Drive pins to a depth of 18 inches into the soil.
- Stakes used to mark survey lines and points shall be made from 3-foot lengths of 2-inch by 2-inch lumber and pointed at one end. Clearly mark them with brightly colored weatherproof flagging and biodegradable paint.
- Clearly mark the point on a monitoring well casing that is surveyed by filing grooves into the casing on either side of the surveyed point.

5.3 Global Positioning System (GPS) to Position Sample Locations or Locate Site Features

Experienced field personnel may use a GPS system unit to position sample locations (e.g. grid positioned samples) at a site. The decision to use field personnel or a licensed land surveyor will depend on the objectives of the survey (e.g. vertical elevation is not required) and the levels of precision required. Typically when a level of precision greater than (±) 3 to 5 meters is required, a licensed surveyor will be required. When a level of precision of (±) 3 to 5 meters is sufficient to meet project requirements (i.e., when laying sampling grids, identifying significant site features, or locating features identified in geographic information system [GIS] figures) experienced field personnel may use commercially available, consumer-grade GPS units. Follow the procedures listed below to locate samples or site features using GPS:

- A commercially available GPS unit with wide angle averaging system (WAAS), topographic map display, and waypoint storage capabilities should be used.
- If waypoints are to be imported into a GIS database, the same grid projection system should be used. For Guam this is typically WGS84, Zone 55N. For Hawaii this will either be NAD83 Zone 3 and 4 or WGS84 Zone 5N.
- If a permanent reference point near the site is available, it is recommended that the reference point is surveyed each day the GPS unit is used.
- When laying out a sampling grid from a GIS map, upload the coordinates from GIS to the GPS unit, including coordinates for an easily identified, permanent, nearby feature (i.e., building corner, roadway intersection, or USGS benchmark).
- If during the initial site walk, the permanent feature identified does not overlay within (±) 5 meters as identified in the GPS unit, field corrections of the waypoints should be made.
- Field corrections can be made by adding/subtracting the difference in x,y coordinates between the field measurement of the permanent site feature and the anticipated x,y coordinates. This correction should then be applied to the x,y coordinates for each sampling location to be marked. Corrected x,y coordinates can then be uploaded into the GPS unit.
- Sampling points and site features can then be located in the field using the GPS units “Go To” function. When the distance to the sampling point or feature remains close to zero, the location can be marked.
- If no field corrections to the sampling location need to be made, or if sampling locations are to be surveyed by a licensed surveyor at a later date, no additional waypoints need to be taken. If significant changes to the sampling location are made, GPS coordinates at the corrected location shall be stored and labeled.
- It is recommended that GPS coordinates be uploaded to a storage device such as a personal computer at the end of each day.
- Field logs shall indicate manufacturer and model number for GPS unit used, map datum and projection used, and any field corrections made. If the GPS unit cannot lock onto a WAAS system at the site, this should also be noted.

6. Records

The surveyor shall record field notes daily using generally accepted practices. The data shall be neat, legible, and easily reproducible. Copies of the surveyor's field notes and calculation forms generated during the work shall be obtained and placed in the project files.

Surveyor's field notes shall, at a minimum, clearly indicate:

- The date of the survey
- General weather conditions
- The name of the surveying firm
- The names and job titles of personnel performing the survey work
- Equipment used, including serial numbers
- Field book designations, including page numbers

A land surveyor registered in the state or territory in which the work was done shall sign, seal, and certify the drawings and calculations submitted by the surveyor.

Dated records of land surveying equipment calibration shall be provided by the surveyor and placed in the project files. Equipment serial numbers shall be provided in the calibration records.

7. Health and Safety

Field personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

9. Attachments

None.

Data Validation

1. Purpose

This procedure describes the presentation format and information provided in the data validation reports under the United States (U.S.) Navy Environmental Restoration (ER) Program for Naval Facilities Engineering Command (NAVFAC), Pacific. The objective of data validation is to provide data of known quality to the end user. This procedure also establishes the method by which a Contract Task Order (CTO) Manager selects and confirms the content of data validation reports and is consistent with protocol in the *Department of Defense Quality Systems Manual (QSM) for Environmental Laboratories* (DoD QSM) (DoD 2013).

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the most recent version of the Uniform Federal Policy-Quality Assurance Project Plan (UFP QAPP) Part 1 (DoD 2005a), 2A (DoD 2012) and 2B (2005b) as well as the DoD Quality Systems Manual (DoD 2013). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA manager) shall also concur with any deviations.

3. Definitions

Acronyms and abbreviations used in all data validation procedures and reports are defined in Attachment II-A-1. Commonly used terms are defined in Attachment II-A-2.

4. Responsibilities

The CTO Manager, the QA Manager or Technical Director, and the CTO QA Coordinator are responsible for ensuring that this procedure is implemented by data validation personnel.

Data validation personnel are responsible for implementing this procedure for all data validation reports.

5. Procedure

5.1 INTRODUCTION

This procedure addresses the validation of data obtained under the NAVFAC Pacific ER Program using primarily U.S. Environmental Protection Agency (EPA) Solid Waste (SW)-846 methods (EPA 2007). Based on the data validation requirements identified in the CTO project planning documents, the analytical data may undergo “Level B,” “Level C,” or “Level D” data validation or some combination of these validation levels. This procedure establishes the required format and content of the various validation reports.

5.1.1 Confirmation of Data Validation Reports

Prior to shipment of all completed data validation reports to the CTO Manager, a single draft report for one sample delivery group (SDG) should be submitted. The CTO Manager shall review the draft report to confirm that the report contains the requested information, and respond to the Data Validation Project Manager in a timely manner. Once the requested contents are confirmed, the complete data validation packages should be delivered to the CTO Manager.

5.2 CONTENT AND FORMAT OF THE DATA VALIDATION REPORT

The data validation report will consist of the following four major components:

1. Cover letter
2. Data validation reference package comprising:
   a. Cover page
   b. Acronyms and abbreviations list
   c. Data qualifier reference table
   d. Qualification code reference table
3. Individual data validation reports by SDG:
   e. Cover page
   f. Introduction
   g. Data validation findings
   h. Appendix of laboratory reports with applied data qualifiers

A discussion of the contents and format of these components is provided in the following sections.

5.2.1 Cover Letter

The cover letter will contain the generation date of the cover letter, the address of the CTO office, the CTO number, and the CTO Manager's name or designee. The cover letter will list the specific reports being sent under that cover letter. A senior data reviewer must review the report and sign the cover letter to denote approval. Attachment II-A-3 is an example of the cover letter.

5.2.2 Data Validation Reference Package

One data validation reference package shall be provided per CTO and shall contain the reference information needed for interpretation of the individual data validation reports. The following sections shall be included:

5.2.2.1 COVER PAGE

The cover page shall indicate the CTO title and number to which the reference package applies.

5.2.2.2 Acronyms and Abbreviations List

This list shall present all acronyms and abbreviations used in the individual data validation reports. Attachment II-A-1 is an example of the acronyms and abbreviations list.

5.2.2.3 Data Qualifier Reference Table

Data qualifiers are applied in cases where the data do not meet the required quality control (QC) criteria or where special consideration by the data user is required.

The data qualifier reference table lists the data qualifiers used in the validation of the analytical data. Attachment II-A-4 is an example of this table.

5.2.2.4 Qualification Code Reference Table

Qualification codes explain why data qualifiers have been applied and identify possible limitations of data use. Attachment II-A-5 provides the qualification codes used by the NAVFAC Pacific ER Program. Qualification codes are to be provided by data validation personnel on the annotated laboratory reports discussed in Section 5.2.3.4.

5.2.3 Individual Data Validation Reports by SDG

For all analyses, each SDG shall have a unique data validation report. The procedures used to generate the reports are discussed in the following sub-sections.

5.2.3.1 Cover Page

The cover page shall indicate the CTO title and number, analysis type, and the SDG(s), which the report addresses.

5.2.3.2 Introduction

This section will contain a brief description of the CTO information that is pertinent to data validation. This information includes the CTO title and number, CTO Manager, the sample matrices and analyses performed on the samples, the data validation level for the project, and a brief discussion of the methodologies used for data validation. This section will also contain a Sample Identification Table which lists the identification of each sample identification number cross referenced with its associated internal laboratory identification number and COC sample number. Each sample will be listed under every analytical method for which data was validated. Attachment II-A-6 is an example of the sample identification table.

5.2.3.3 Data Validation Findings

This section shall present the data validation findings of the data reviewer for the CTO data package. The findings shall be determined on the basis of validation criteria established for each analytical method[1] in the DoD QSM (DoD 2013) or the CTO planning document and Procedure II-B through Procedure II-X. For all data validation levels, the data validation findings are divided into the following analytical categories:

- II-B GC/MS Volatile Organics by SW-846 Method 8260

[1] Other methods may be included with approval of the CTO and Data Validation Managers.

- II-C GC/MS Semivolatile Organics by SW-846 8270 (full scan and SIM)
- II-D HRGC/HRMS Polychlorinated Dibenzodioxins (PCDDs) and Polychlorinated Dibenzofurans (PCDFs) by SW-846 8290
- II-E Organochlorine Pesticides by SW-846 8081
- II-F Polychlorinated Biphenyls as Aroclors by SW-846 8082
- II-G Polychlorinated Biphenyls as Congeners by SW-846 8082
- II-H Total Petroleum Hydrocarbons by SW-846 8015
- II-I Chlorinated Herbicides by SW-846 8151
- II-J Organophosphorus Pesticides by SW-846 8141
- II-K Halogenated and Aromatic Volatiles by SW-846 8021
- II-L Phenols by SW-846 8041
- II-M Ethylene Dibromide/Dibromochloropropane by SW-846 8011
- II-N Polynuclear Aromatic Hydrocarbons by SW-846 8310
- II-O Explosives by SW-846 8330
- II-P Carbamate and Urea Pesticides by EPA Method 632
- II-Q Metals by EPA Method SW-846 6000/7000
- II-R Wet Chemistry Analyses
- II-S Data Quality Assessment Report
- II-T HRGC/HRMS Polychlorinated Biphenyls as Congeners by EPA Method 1668
- II-U Carbamate and Urea Pesticides by SW-846 8321
- II-V Perchlorate by SW-846 6850
- II-W GC/FID/ECD Volatile Organics and Fixed Gases in Soil Gas/Vapor by EPA Method TO-3 and ASTM D1946
- II-X GC/MS Volatile Organics and Fixed Gases in Soil Gas/Vapor by EPA Method TO-14, TO-15, and TO-17

GC/MS	gas chromatography/mass spectrometry
ECD	electron capture detector
FID	flame ionization detector
HRGC/HRMS	high resolution gas chromatograph/high resolution mass spectrometer
SIM	selective ion monitoring

Level C and Level D Data Validation

Data obtained using any analytical methods in the above categories will be validated in terms of meeting criteria for specific QA/QC factors such as holding times, instrument calibration, and blank analyses. A separate discussion of each QA/QC factor under each analytical method will be presented in the CTO data validation report. The QA/QC factors used to validate data for Level C and Level D validation are presented below for each analytical category.

Volatile Organics by Gas Chromatography/Mass Spectrometry (GC/MS)

1. Sample management (sample preservation, handling, and transport, chain-of-custody, and holding times)
2. GC/MS instrument performance check
3. Calibration (initial calibration, initial calibration verification, and continuing calibration)
4. Method blanks
5. Blank spikes and laboratory control samples (LCSs)
6. Surrogate recovery
7. Matrix spike/matrix spike duplicate (MS/MSD)
8. Field QC samples (trip blanks, equipment blanks, field blanks, field duplicates, and field triplicates)
9. Internal standards performance
10. Target compound identification (Level D only*)
11. Compound quantitation and reporting limits (RLs) (Level D only*)
12. Tentatively identified compounds (Level D only*)
13. System performance (Level D only*)

Semivolatile Organics by Full Scan and SIM GC/MS

1. Sample management (sample preservation, handling, and transport; chain-of-custody; holding times)
2. GC/MS instrument performance check (full scan)
3. Calibration (initial calibration, initial calibration verification, and continuing calibration)
4. Method blanks
5. Blank spikes and LCSs
6. Surrogate recovery
7. MS/MSD
8. Field QC samples (equipment blanks, field blanks, and field duplicates)
9. Internal standards performance
10. Target Compound identification (Level D only*)
11. Compound quantitation and RLs (Level D only*)
12. Tentatively identified compounds (Level D only*)

13. System performance (Level D only*)

Dioxins/Dibenzofurans by HRGC/HRMS

1. Sample management (sample preservation, handling, and transport; chain-of-custody; holding times)
2. HRGC/HRMS instrument performance check
3. Calibration (initial calibration, initial calibration verification, and continuing calibration)
4. Method blanks
5. Blank spikes and LCSs
6. MS/MSD
7. Field QC samples (equipment blanks, field blanks, field duplicates, and field triplicates)
8. Internal standards performance
9. Target compound identification (Level D only*)
10. Compound quantitation and RLs (Level D only*)
11. System performance (Level D only*)

Organochlorine Pesticides by GC

1. Sample management (sample preservation, handling, and transport; chain-of-custody; holding times)
2. Pesticides instrument performance (retention time evaluation, 4,4'-DDT/Endrin breakdown evaluation)
3. Calibration (analytical sequence, initial calibration, initial calibration verification, continuing calibration)
4. Method blanks
5. Blank spikes and LCSs
6. Surrogate recovery
7. MS/MSD
8. Sample cleanup performance
9. Field QC samples (equipment blanks, field blanks, field duplicates, and field triplicates)
10. Target compound identification (Level D only*)
11. Compound quantitation and RLs (Level D only*)

Organic Analyses by GC (QA/QC factors may vary depending on analysis type)

1. Sample management (sample preservation, handling, and transport; chain-of-custody; holding times)

2. Instrument performance
3. Calibration (initial calibration, initial calibration verification and continuing calibration)
4. Method blanks
5. Blank spikes and LCS
6. Surrogate recovery
7. MS/MSD
8. Field QC samples (trip blanks [volatile organic compounds], equipment blanks, field blanks, field duplicates, and field triplicates)
9. Target compound identification (Level D only*)
10. Compound quantitation and RLs (Level D only*)

Organic Analyses by High-Performance Liquid Chromatography (QA/QC factors may vary depending on analysis type)

1. Sample management (sample preservation, handling, and transport; chain-of-custody; holding times)
2. Instrument performance
3. Calibration (initial calibration, initial calibration verification and continuing calibration)
4. Method blanks
5. Blank spikes and LCSs
6. Surrogate recovery
7. MS/MSD
8. Field QC samples (equipment blanks, field blanks, field duplicates, and field triplicates)
9. Target compound identification (Level D only*)
10. Compound quantitation and reporting limits (RLs) (Level D only*)

Organic Analyses by Liquid Chromatography–Mass Spectrometry (QA/QC factors may vary depending on analysis type)

1. Sample management (sample preservation, handling, and transport; chain-of-custody; holding times)
2. Instrument performance
3. Calibration (initial calibration, initial calibration verification, and continuing calibration)
4. Method blanks
5. Blank spikes and LCSs
6. MS/MSD
7. Field QC samples (equipment blanks, field blanks, field duplicates, and field triplicates)

8. Internal standards performance
9. Target compound identification (Level D only*)
10. Compound quantitation and RLs (Level D only*)

Metals

1. Sample management (sample preservation, handling, and transport; chain-of-custody; holding times)
2. Calibration (initial and continuing)
3. Blanks (Calibration blanks and Method [preparation] blanks)
4. Inductively coupled (argon) plasma (spectroscopy) (ICP) interference check sample
5. Blank spikes and LCSs
6. MS/MSD and Matrix duplicates
7. Furnace atomic absorption QC
8. Internal standards performance (MS methods only)
9. ICP serial dilution
10. Sample result verification (Level D only*)
11. Field QC samples (equipment blanks, field blanks, field duplicates, and field triplicates)

Inorganic Analyses by Wet Chemical Methods, (QA/QC factors may vary depending on analysis type)

1. Sample management (sample preservation, handling, and transport; chain-of-custody; and holding times)
2. Calibration (initial and continuing)
3. Method blanks
4. Blank spikes and LCSs
5. MS/MSD and Matrix duplicates
6. Sample result verification (Level D only*)
7. Field QC samples (equipment blanks, field blanks, field duplicates, and field triplicates)

* Sections applicable to Level D validation only will also appear in Level C validation reports with the notation “not applicable for Level C validation.”

Level B Data Validation

Data obtained using any analytical methods in the Level B Validation analytical categories will be validated in terms of meeting criteria for specific QA/QC factors such as holding times, blank spike analyses, and blank analyses. A separate discussion of each QA/QC factor under each analytical method will be presented in the CTO data validation report. The QA/QC factors used to validate data for QA/QC "Level B Validation" are presented below for each analytical category.

Organic Analyses

1. Sample management (sample preservation, handling, and transport; chain-of-custody; and holding times)
2. Method blanks
3. Blank spikes and laboratory control samples
4. Field QC samples (trip blanks (volatile organic compounds), equipment blanks, field blanks, field duplicates, and field triplicates)
5. Surrogate recovery
6. MS/MSD

Inorganic Analyses

1. Sample management (sample preservation, handling, and transport; chain-of-custody; and holding times)
2. Blanks (Calibration and Method blanks)
3. Blank spikes and LCSs
4. Field QC samples (equipment blanks, field blanks, field duplicates, and field triplicates)
5. MS/MSD and Laboratory Duplicates
6. ICP serial dilution

5.2.3.4 LABORATORY REPORTS

Annotated laboratory reports with the appropriate data qualifiers and qualification codes as specified in the NAVFAC Pacific ER Program data validation procedures will be submitted as an appendix to the data validation report. An example is provided as Attachment II-A-7. Records

Copies of all documents generated by data validation personnel will be stored for no less than 10 years. The original validated laboratory data shall be archived to the Federal Records Center at project completion.

6. References

Department of Defense, United States (DoD). 2005a. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

———. 2005b. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2B: Quality Assurance/quality Control Compendium: Minimum QA/QC Activities*. Final Version 1. DoD: DTIC ADA 426957, EPA-505-B-04-900B. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/swerffrr/pdf/-qaqc_v1_0305.pdf.

———. 2012. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2A: Optimized UFP-QAPP Worksheets*. Revision 1. March.

———. 2013. *Department of Defense Quality Systems Manual for Environmental Laboratories.* Version 5.0. Draft Final. Prepared by DoD Environmental Data Quality Workgroup and Department of Energy Consolidated Audit Program Operations Team. July.

Environmental Protection Agency, United States (EPA). 2007. *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846.* 3rd ed., Final Update IV. Office of Solid Waste. On-line updates at: www.epa.gov/epaoswer/hazwaste/test/new-meth.htm.

7. Attachments

Attachment II-A-1: Acronyms and Abbreviations

Attachment II-A-2: Definition of Terms

Attachment II-A-3: Sample Cover Letter

Attachment II-A-4: Data Qualifier Reference Table

Attachment II-A-5: Qualification Code Reference Table

Attachment II-A-6: Sample Identification Table

Attachment II-A-7: Example Annotated Laboratory Report Volatile Organics Analysis Data Sheet

Attachment II-A-1
Acronyms and Abbreviations

ACRONYMS AND ABBREVIATIONS

Following is a list of acronyms and abbreviations that may be used in NAVFAC Pacific ER Program data validation reports and the data quality assessment reports.

%D	percent difference
%R	percent recovery
µg/kg	microgram per kilogram
µg/L	microgram per liter
4,4'-DDD	4,4'-dichlorodiphenyldichloroethane
4,4'-DDE	4,4'-dichlorodiphenyldichloroethylene
4,4'-DDT	4,4'-dichlorodiphenyltrichloroethane
AA	atomic absorption
ARRF	average relative response factor
BFB	bromofluorobenzene
BNA	base/neutral/acid
CCB	continuing calibration blank
CCC	calibration check compound
CCV	continuing calibration verification
CF	calibration factor
CLP	Contract Laboratory Program
COC	chain-of-custody
COD	chemical oxygen demand
CTO	contract task order
CVAA	cold vapor atomic absorption
DBCP	Dibromochloropropane
DCB	decachlorobiphenyl
DFTPP	decafluorotriphenylphosphine
DL	detection limit
DoD	Department of Defense
DOE	Department of Energy
DQAR	data quality assessment report
DUP	laboratory duplicate
DVP	data validation procedure
EB	equipment blank
EDB	ethylene dibromide
EDL	estimated detection limit
EICP	extracted ion current profile
EPA	Environmental Protection Agency, United States
FB	field blank
GC	gas chromatography
GC/ECD	gas chromatography/electron capture detector
GC/ELCD	gas chromatography/electrolytic conductivity detector (Hall detector)
GC/FPD	gas chromatography/flame photometric detector
GC/MS	gas chromatography/mass spectrometry

GC/PID	gas chromatography/photoionization detector
GFAA	graphite furnace atomic absorption
GPC	gel permeation chromatography
Hg	mercury
HPLC	high-performance liquid chromatography
HRGC/HRMS	high resolution gas chromatography/high resolution mass spectrometry
HT	holding time
ICB	initial calibration blank
ICP	inductively coupled plasma
ICS	interference check sample
ICV	initial calibration verification
IDL	instrument detection limit
IR	infrared spectroscopy
IRP	installation restoration program
IS	internal standards
LCS	laboratory control sample
LOD	limit of detection
LOQ	limit of quantitation
m/z	mass to charge ratio
MBAS	methyl blue active substance
mg/kg	milligram per kilogram
mg/L	milligram per liter
MS	matrix spike
MSA	method of standard addition
MSD	matrix spike duplicate
NFESC	Naval Facilities Engineering Services Center
ng/kg	nanogram per kilogram
OP	organophosphorus
PAH	polynuclear aromatic hydrocarbon
PARCC	precision, accuracy, representativeness, comparability, completeness
PCB	polychlorinated biphenyl
PCDD	polychlorinated dibenzodioxin
PCDF	polychlorinated dibenzofuran
PE	performance evaluation
PEM	performance evaluation mixture
PFK	perfluorokerosene
pg/g	picogram per gram
pg/L	picogram per liter
PQO	project quality objective
QA	quality assurance
QAC	quality assurance coordinator
QAPP	quality assurance project plan
QC	quality control
QSM	quality system manual

r	correlation coefficient
r^2	coefficient of determination
RF	response factor
RIC	reconstructed ion chromatogram
RL	reporting limit
RPD	relative percent difference
RRF	relative response factor
RRT	relative retention time
RSD	relative standard deviation
RT	retention time
s/n	signal to noise ratio
SDG	sample delivery group
SICP	selected ion current profiles
SOP	standard operating procedure
SOW	statement of work
SPCC	system performance check compound
SRM	standard reference material
SVOC	semivolatile organic compound
TB	trip blank
TCDD	tetrachlorodibenzodioxin
TCX	tetrachloro-m-xylene
TDS	total dissolved solids
TIC	tentatively identified compound
TOC	total organic carbon
TOX	total organic halides
TPHE	total petroleum hydrocarbons as extractables
UV/VIS	ultraviolet/visible
VOA	volatile organic analysis
VOC	volatile organic compound
VTSR	validated time of sample receipt
WDM	window defining mixture

Attachment II-A-2
Definition of Terms

DEFINITION OF TERMS

Calibration Curve	–	A plot of response versus concentration of standards.
CCB	–	Continuing Calibration Blank – a deionized water sample run every 10 samples designed to detect any carryover contamination.
CCV	–	Continuing Calibration Verification – a standard run every 10 samples to test instrument performance.
EDL	–	Estimated Detection Limit – The sample specific EDL is the concentration of a given analyte required to produce a signal with a peak height of at least 2.5 times the background signal level.
Field Blank	–	Field blanks are intended to identify contaminants that may have been introduced in the field through source water.
Field Duplicate	–	A duplicate sample generated in the field, not in the laboratory.
Findings	–	Any out-of-control, unacceptable, or out of criteria event which may impact the quality of the data or require corrective action.
GPC	–	Gel Permeation Chromatography – A sample clean-up technique that separates compounds by size and molecular weight. Generally used to remove oily materials from sample extracts.
Holding Time	–	The time from sample collection to sample analysis.
ICB	–	Initial Calibration Blank – the first blank standard run to confirm the calibration curve.
ICV	–	Initial Calibration Verification – the first standard run to confirm the calibration curve.
Initial Calibration	–	The establishment of a calibration curve with the appropriate number of standards and concentration range. The calibration curve plots instrument response versus concentration of standards.
IR	–	Infrared Spectroscopy.
IS	–	Internal Standards – compounds added to every VOA and BNA standard, blank, matrix spike duplicate, and sample extract at a known concentration, prior to instrumental analysis. Internal standards are used as the basis for quantitation of the target compounds.
Laboratory Duplicate	–	A duplicate sample generated in the laboratory.
MDL	–	Method Detection Limit – minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero.
MS	–	Matrix Spike – introduction of a known concentration of analyte into a sample to provide information about the effect of the sample matrix on the extraction or digestion and measurement methodology.
m/z	–	The ratio of mass (m) to charge (z) of ions measured by GC/MS.

Post Digestion Spike	–	The addition of a known amount of standard after digestion. (Also identified as analytical spike or spike for furnace analysis).
Primary Analysis	–	One of two types of pesticide/PCB analysis by GC/EC techniques, the other being confirmation analysis. The primary analysis is used to establish the tentative identification of any pesticides/PCBs detected. The identification is confirmed in the confirmation analysis. If the two analyses are done simultaneously, either may be considered the primary analysis. Either may be used for quantitation if contract criteria are met.
QA	–	Quality Assurance – total program for assuring the reliability of data
QC	–	Quality Control – routine application of procedures for controlling the monitoring process.
RL	–	Reporting Limit – value specified by the client based on sensitivity requirements from project-specific action levels.
RPD	–	Relative Percent Difference (between matrix spike and matrix spike duplicate, duplicate laboratory control samples, or blank spikes)
Serial Dilution	–	A sample run at a specific dilution to determine whether any significant chemical or physical interferences exist due to sample matrix effects (ICP only).
SDG	–	Sample Delivery Group – defined by one of the following, whichever occurs first: • Case of field samples • Each 20 field samples within a case • Each 14-day calendar period during which field samples in a case are received, beginning with receipt of the first sample in the SDG
Level B Validation	–	Data validation is performed using sample results and QA/QC summaries (i.e., method blanks, LCS, MS/MSDs, surrogates, and serial dilutions). This level of data validation was previously identified as “Standard.”
Level C Data Validation	–	Data validation is performed using sample results and QA/QC summaries (including instrument performance, calibration, and internal standard data). This level of data validation was previously identified as “Cursory.”
Level D Data Validation	–	Data validation is performed using sample results, QA/QC summaries (including instrument performance, calibration, and internal standard data) and raw data associated to the sample results and QA/QC summaries. This level of data validation was previously identified as “Full.”

Attachment II-A-3
Sample Cover Letter

SAMPLE COVER LETTER

(Date)

(CTO Manager or designee) (company address) Dear ( ): Enclosed is Revision __ of the data validation reports for CTO (number) as follows: Semi-volatiles SDG S0221 SDG S0350 Pesticides/PCBs SDG S0201 Metals SDG S0221 SDG S0201 The specific sample identifications are listed in the Sample Identification Table(s). The data packages were reviewed according to the data validation procedures referenced in the introduction to each report.

Sincerely,

(Signature)

Data Validation Project Manager

Attachment II-A-4
Data Qualifier Reference Table

Table II-A-4-1: Data Qualifier Reference Table

Qualifier	Organics	Inorganics
U	The analyte was analyzed for, but was not detected above the method detection limit.	The analyte was analyzed for, but was not detected above the method detection limit.
J	The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.	The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample.
N	The analysis indicates the presence of an analyte for which there is presumptive evidence to make a "tentative identification."	Not applicable.
NJ	The analysis indicates the presence of an analyte that has been "tentatively identified" and the associated numerical value represents its approximate concentration.	Not applicable.
UJ	The analyte was not detected above the method detection limit. However, the associated value is approximate and may or may not represent the actual limit of quantitation necessary to accurately and precisely measure the analyte in the sample.	The analyte was analyzed for, but was not detected. The associated value is an estimate and may be inaccurate or imprecise.
R	The sample results are rejected due to serious deficiencies in the ability to analyze the sample and to meet quality control criteria. The presence or absence of the analyte cannot be verified.	The data are unusable. The sample results are rejected due to serious deficiencies in meeting the Quality Control (QC) criteria. The analyte may or may not be present in the sample.

Attachment II-A-5
Qualification Code Reference Table

Table II-A-5-1: Qualification Code Reference Table

Qualifier	Organics	Inorganics
H	Holding times were exceeded.	Holding times were exceeded.
S	Surrogate recovery was outside QC limits.	The sequence or number of standards used for the calibration was incorrect.
C	Calibration %RSD, r, r^2 or %D were noncompliant	Correlation coefficient is <0.995.
R	Calibration RRF was <0.05.	%R for calibration is not within control limits
B	Presumed contamination from preparation (method blank)	Presumed contamination from preparation (method) blank or calibration blank
L	Laboratory Control Sample/Laboratory Control Sample Duplicate %R or RPD was not within control limits	Laboratory Control Sample/Laboratory Control Sample Duplicate %R or RPD was not within control limits
Q	MS/MSD recovery was poor	MS/MSD recovery was poor.
E	MS/MSD or Duplicate RPD was high.	MS/MSD or Duplicate RPD or difference was high.
I	Internal standard performance was unsatisfactory	ICP ICS results were unsatisfactory.
A	Not applicable.	ICP Serial Dilution %D were not within control limits
M	Instrument Performance Check (BFB or DFTPP) was noncompliant	Not applicable.
T	Presumed contamination from trip blank.	Not applicable.
F	Presumed contamination from FB or ER.	Presumed contamination from FB or ER.
D	The analysis with this flag should not be used because another more technically sound analysis is available.	The analysis with this flag should not be used because another more technically sound analysis is available.
P	Instrument performance for pesticides was poor	Post Digestion Spike recovery was not within control limits
V	Unusual problems found with the data that have been described in the validation report where a description of the problem can be found.	Unusual problems found with the data that have been described in where a description of the problem can be found.

Attachment II-A-6
Sample Identification Table

Table II-A-6-1: Sample Identification Table

EPA Identification	Sample Identification	Lab Identification Number	COC Sample Number	Matrix
FB001	FB-BS04-E01-D10.0	2720-1	DA001	water
FB002	FB-BS04-B01-D10.0	2720-2	DA002	water
FB003	FB-BS04-B02-D10.0	2720-3	DA003	water
FB004	FB-SS01-S01-D0.5	2720-4	DA004	soil
FB005	FB-BS01-S01-D10.0	2720-5	DA005	soil
FB006	FB-SS02-S01-D0.5	2720-6	DA006	soil
FB007	FB-BS02-S01-D10.0	2720-7	DA007	soil
FB008	FB-BS02-D01-D10.0	2720-8	DA008	soil
FB009	FB-SS03-S01-D0.5	2720-9	DA009	soil
FB010	FB-BS03-S01-D10.0	2720-10	DA010	soil

Attachment II-A-7
Example Annotated Laboratory Report
Volatile Organics Analysis Data Sheet

EXAMPLE ANNOTATED LABORATORY REPORT
VOLATILE ORGANICS ANALYSIS DATA SHEET

1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.: CA145

Lab Name: COLUMBIA ANALYTICAL SERVI Contract: EARTH TECH

Lab Code: COLUMB Case No.: SAS No.: SDG No.: K9804746

Matrix: (soil/water) SOIL Lab Sample ID: K9804746-013

Sample wt/vol: 5.1 (g/mL) G Lab File ID: 0727F009

Level: (low/med) LOW Date Received: 07/17/98

% Moisture: not dec. 11 Date Analyzed: 07/27/98

GC Column: RTX-624 ID: 0.32 (mm) Dilution Factor: 1.0

Soil Extract Volume:________(uL) Soil Aliquot Volume: ________(uL)

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/KG	Q	
74-87-3	Chloromethane	11	U	U
74-83-9	Bromomethane	11	U	
75-01-4	Vinyl Chloride	11	U	
75-00-3	Chloroethane	11	U	
75-09-2	Methylene Chloride	0.8	JB	11U (B)
67-64-1	Acetone	2	JB	
75-15-0	Carbon Disulfide	11	U	U
75-35-4	1,1-Dichloroethene	11	U	
75-34-3	1,1-Dichloroethane	11	U	
540-59-0	1,2-Dichloroethene (total)	11	U	
67-66-3	Chloroform	11	U	
107-06-2	1,2-Dichloroethane	11	U	
78-93-3	2-Butanone	11	U	
71-55-6	1,1,1-Trichloroethane	11	U	
56-23-5	Carbon Tetrachloride	11	U	
75-27-4	Bromodichloromethane	11	U	
78-87-5	1,2-Dichloropropane	11	U	
10061-01-5	cis-1,3-Dichloropropene	11	U	
79-01-6	Trichloroethene	11	U	
124-48-1	Dibromochloromethane	11	U	
79-00-5	1,1,2-Trichloroethane	11	U	
71-43-2	Benzene	11	U	
10061-02-6	trans-1,3-Dichloropropene	11	U	
75-25-2	Bromoform	11	U	
108-10-1	4-Methyl-2-Pentonone	11	U	
591-78-6	2-Hexanone	11	U	
127-18-4	Tetrachloroethene	0.2	J	J
79-34-5	1,1,2,2-Tetrachloroethane	11	U	U
108-88-3	Toluene	0.2	JB	11U (B)
108-90-7	Chlorobenzene	11	U	U
100-41-4	Ethylbenzene	11	U	U
100-42-5	Styrene	0.4	JB	11U (B)
1330-20-7	Xylene (Total)	0.2	JB	11U (B)

FORM I VOA ug 6/6/98 OLM03.0

01513
"U.S. NAVY PACDIV IRP VALIDATED"

Level C and Level D Data Validation for Total Petroleum Hydrocarbons by SW-846 8015

1. Purpose

This data validation procedure sets forth the standard operating procedure for performance of Level C and Level D data validation of total petroleum hydrocarbons (TPH) data obtained under the United States (U.S.) Navy Environmental Restoration (ER) Program for Naval Facilities Engineering Command (NAVFAC), Pacific and is consistent with protocol in the *Department of Defense Quality Systems Manual (QSM) for Environmental Laboratories* (DoD QSM) (DoD 2013). Level B validation is addressed separately in Procedure II-A, *Data Validation*.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the most recent version of the Uniform Federal Policy-Quality Assurance Project Plan (UFP QAPP) Part 1 (DoD 2005a), 2A (DoD 2012), and 2B (2005b), as well as the DoD Quality Systems Manual (DoD 2013). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Responsibilities

The CTO Manager, the QA Manager or Technical Director, and the CTO QA Coordinator are responsible for ensuring that this procedure is implemented by data validation personnel.

Data validation personnel are responsible for implementing this procedure for validation of all gas chromatography (GC) TPH data.

4. Procedure

This procedure addresses the validation of TPH data obtained using U.S. Environmental Protection Agency (EPA) Method Solid Waste (SW)-846 8015 (EPA 2007). The quality control (QC) criteria identified in this procedure are those specified in the analytical method and the DoD QSM (DoD 2013). Where project specific criteria are identified in the CTO work plan, they will supersede the QC criteria identified in this procedure.

- Form I: Sample Results Summary Form
- Form II: Surrogate Recovery Summary Form
- Form III: Matrix Spike/Matrix Spike Duplicate or Blank Spike/Blank Spike Duplicate Recovery Summary Form

- Form IV: Method Blank Summary Form
- Form VI: Initial Calibration Summary Form
- Form VII: Continuing Calibration Summary Form
- Form VIII: TPH Analytical Sequence Form

Level C data validation consists of review of summary forms only while Level D data validation requires review of both summary forms and all associated raw data. Data review guidelines and how they apply to the different validation levels are indicated in the following text.

4.1 SAMPLE MANAGEMENT

QA/QC criteria included under sample management are sample preservation, handling, and transport; chain of custody (COC); and holding times.

4.1.1 Sample Preservation, Handling, and Transport

Level C and Level D:

Evaluate sample collection, handling, transport, and laboratory receipt from COC and laboratory receipt checklists to ensure that the samples have been properly preserved and handled.

TPH as Gasoline

1. Water samples must be preserved with hydrochloric acid at or below a pH of 2 and refrigerated at above freezing to 6 degrees Celsius (°C).
2. Soil samples collected in volatile organic analysis (VOA) vials or coring devices must be refrigerated at above freezing to 6°C. If the samples are to be analyzed after the 48-hour holding time, the laboratory must preserve the samples with sodium bisulfate or methanol or freeze upon receipt in accordance with EPA SW-846 Method 5035 (EPA 2007).
3. If the analyzed aqueous VOA vial contains air bubbles or headspace, is cracked, or has a cracked cap, positive values shall be flagged as estimated “J” and nondetects as estimated “UJ.” The sample data may be qualified as unusable “R” if the container damage is extensive or improper sealing is identified.
4. VOA vials are to be shipped in coolers that are maintained at above freezing to 6°C. If the temperature exceeds 6°C, but is less than or equal to 10°C, note this in the data validation report. If the temperature of receipt is greater than or equal to 11°C, positive values shall be flagged as estimated “J” and nondetects as estimated “UJ.” If the temperature of receipt is greater than or equal to 15°C, positive values shall be flagged as estimated “J” and nondetects as unusable “R.” If the temperature is below 0°C, special note should be made that the samples were frozen and no qualification shall be required. In the event that both a cooler temperature and a temperature blank were measured, the temperature blank shall be evaluated for temperature compliance as it best assimilates the condition of the samples; however, both temperatures shall be noted in the data validation report.

TPH as Extractables

1. Samples are to be shipped in coolers that are maintained at above freezing to 6°C. If the temperature exceeds 6°C but is less than or equal to 10°C, note this in the data validation

report. If the temperature of receipt is greater than or equal to 11°C, positive values shall be flagged as estimated "J" and nondetects as estimated "UJ." If the temperature is below 0°C, special note should be made that the samples were frozen and no qualification shall be required. In the event that both a cooler temperature and a temperature blank were measured, the temperature blank shall be evaluated for temperature compliance as it best assimilates the condition of the samples; however, both temperatures shall be noted in the data validation report.

2. Water samples shall not be preserved; they shall only be kept cool. If the water samples were inappropriately preserved with acid, the samples should not be analyzed. Analysis of an inappropriately preserved sample by the laboratory may require that all results be reported as unusable "R."
3. If the temperature of the cooler upon receipt at the laboratory was not recorded, document that the laboratory is noncompliant.

If the receiving laboratory transferred the samples to another laboratory for analysis, apply the same temperature criteria to both the transfer COC and the original COC.

4.1.2 Chain of Custody

Level C and Level D:

Examine the COC for legibility and check that all TPH analyses requested on the COC have been performed by the laboratory. Ensure that the COC Sample Number on the laboratory Form I (or equivalent) matches the Sample Identification on the COC. Read the laboratory case narrative for additional information.

1. Any samples received for analysis that were not analyzed shall be noted in the data validation report, along with the reason(s) for failure to analyze the samples, if the reason(s) can be determined. Conversely, samples that were analyzed for TPH but were not requested should also be noted.
2. Any discrepancies in sample naming between the COC and Form I (or equivalent) shall be noted in the data validation report with the correct sample name being identified if the correct sample name can be determined.
3. If the receiving laboratory transferred the samples to another laboratory for analysis, both the original COCs and transfer COCs shall be present. Document in the data validation report if the transfer COCs are not present.
4. Internal COC is required for all samples, extracts, and digestates from receipt to disposal. Verify the internal COC forms for completeness. Document in the data validation report if the internal COC forms are not present.
5. Each individual cooler shall have an individual COC that lists only samples contained within that cooler. Document in the data validation report if multiple coolers appear on one COC.

4.1.3 Holding Times

Level C and Level D:

Holding times for TPH are measured from the time of collection (as shown on the COC) to the time of sample extraction and from the time of sample extraction to the time of sample analysis (as shown on the Form I [or equivalent]). Samples and extracts must be stored and refrigerated at above freezing to 6°C until the time of analysis.

TPH as Gasoline

1. Water samples must be preserved with hydrochloric acid and refrigerated at above freezing to 6°C. Preserved water samples shall be analyzed within 14 days from the collection date. If there is no indication of chemical preservation, assume samples are unpreserved. For unpreserved water samples, the holding time is 7 days from date collected.
2. Soil samples collected in VOA vials or coring devices that are unpreserved must be refrigerated at above freezing to 6°C and analyzed within 48 hours from the collection date. Soil samples that are preserved with sodium bisulfate or methanol, or frozen upon laboratory receipt shall be analyzed within 14 days from the collection date.

TPH as Extractables

Water samples shall be unpreserved and refrigerated at above freezing to 6°C and shall be extracted within 7 days of collection and analyzed within 40 days of extraction.

Soil samples shall be unpreserved and refrigerated at above freezing to 6°C and shall be extracted within 14 days of collection and analyzed within 40 days of extraction.

1. If the holding time is exceeded, flag all associated positive results as estimated "J" and all associated limits of detection (LODs) (nondetects) as estimated "UJ," and document that holding times were exceeded.
2. If holding times are grossly exceeded by greater than a factor of 2.0 (e.g., a non-preserved water sample has an extraction holding time of more than 14 days), detects will be qualified as estimated "J" and nondetects as unusable "R."

4.2 GC Instrument Performance

Level C:

Instrument performance is not evaluated for Level C validation.

Level D:

Evaluate the blank, standard, laboratory control sample, and sample chromatograms to ascertain the performance of the chromatographic system. Professional judgment should be used to qualify the data when unacceptable chromatographic conditions preclude proper quantitation or identification of TPH.

4.3 Calibration

Compliance requirements for satisfactory instrument calibration are established to ensure that an instrument is capable of producing acceptable quantitative data. Initial calibration demonstrates that an instrument is capable of acceptable performance at the beginning of a sequence, and continuing calibration checks document satisfactory maintenance and adjustment of the instrument on a day-to-day basis.

Level C and Level D:

1. The proper analytical sequence must be followed to ensure proper quantitation and identification of all target compounds. For the quantitation analysis, standards containing all target compounds, (specific hydrocarbon products or n-alkanes) must be analyzed in the initial calibration at the beginning of the sequence. If n-alkane ranges rather than specific hydrocarbon products are being reported, n-alkane standards must be run in the initial calibration and should be analyzed periodically to ensure proper identification of the n-alkane range reported. An initial calibration verification standard must be analyzed following each initial calibration. The mid-level standard of the initial calibration must be analyzed after every 10 samples as the continuing calibration and at the end of the sequence to ensure system performance has not degraded. If the proper sequence has not been analyzed, use professional judgment to assess the reliability of the data.
2. The laboratory should report retention time window data for each compound and each column used to analyze the samples. The retention time windows are used for qualitative identification. The laboratory should also report quantitation ranges used for integration when analyzing samples. If the compounds in the continuing calibration standard do not fall within the retention time windows established in the initial calibration, the associated sample results should be carefully evaluated, especially the retention time of the surrogate spike compound. All samples injected after the last in-control standard are potentially affected.

4.3.1 Initial Calibration

Level C and Level D:

For the initial calibration (at least five-points), the relative standard deviation (RSD) of the calibration factor (CF) for each target compound must be less than or equal to 20 percent. Verify the RSDs from the initial calibration summary forms. Alternatively, a linear curve may be used with a coefficient of determination; r^2 equal to or greater than 0.990. A second order calibration curve may also be used after evaluating the laboratory's acceptance criteria. If the initial calibration criteria are not met, flag all associated quantitative results as estimated “J” for detects and estimated “UJ” for nondetects.

Level D:

Verify the percent RSDs, r^2, or laboratory established measure of linearity for the initial calibration from the raw data. Verify the CF for each target compound from the raw data on the low-point calibration standard and one additional calibration standard. If errors are discovered, request a resubmittal from the laboratory. Validate the data according to the criteria outlined above.

4.3.2 Initial Calibration Verification

The initial calibration curve must be verified with a standard that has been purchased or prepared from an independent source each time initial calibration is performed. A standard from the same manufacturer but independently prepared from different source materials may also be used as an independent source. This initial calibration verification (ICV) must contain all of the method target compounds.

Level C and Level D:

1. Verify the ICV was analyzed following the initial calibration and contained all method target compounds.
2. If any target analyte has a percent difference (%D) greater than 20 percent, flag detects for the affected compounds as estimated "J" and nondetects as estimated "UJ" in all samples associated with the initial calibration.

Level D:

Verify from the raw data that there were no calculation or transcription errors by recalculating a percentage of the ICV calculations.

4.3.3 Continuing Calibration

Level C and Level D:

Verify the %D from the continuing calibration summary forms. For the continuing calibration, the %D between the CF from the continuing calibration and the average CF from the initial calibration must be less than 20 percent. Alternatively, if a linear (first-order) calibration curve is utilized in the initial calibration, the %D of the calculated amount and the true amount for each compound must be less than or equal to 20 percent. If the continuing calibration criteria are not met, qualify all associated results as estimated "J" for detects and "UJ" for nondetects.

Level D:

Verify the %Ds from the raw data.

4.4 BLANKS

Method blank analytical results are assessed to determine the existence and magnitude of contamination problems. If problems with any method blank exist, all associated data must be carefully evaluated to determine whether there is any bias associated with the data, or if the problem is an isolated occurrence not affecting other data. No contaminants should be present in the method blank(s). The method blank should be analyzed on each GC system used to analyze site samples.

1. The reviewer should identify samples associated with each method blank using Form IV (or equivalent). Verify that method blank analysis has been reported per matrix and concentration level for each set of samples. Each sample must have an associated method blank. Qualify positive results in samples with no method blank as unusable "R." Nondetects do not require qualification.
2. If the method blank was not analyzed on a GC used to analyze site samples, note the deficiency in the data validation report. Professional judgment shall be used for subsequent qualification of the data.
3. Compare the results of each method blank with the associated sample results. The reviewer should note that the blank analyses may not involve the same weights, volumes, percent moistures, or dilution factors as the associated samples. These factors must be taken into consideration when applying the criteria discussed below, such that a comparison of the total amount of contamination is actually made.

4. If a compound is found in the blank, but not in the associated sample, no action is taken.
5. Any compound detected in both the sample and the associated blank shall be qualified when the sample concentration is less than the limit of quantitation (LOQ) and the blank concentration is less than, greater than, or equal to the LOQ. Care should be taken to factor in the percent moisture when comparing detects in the sample and the method blank. The applicable review qualifier(s) are summarized in Table II-H-1.

Table II-H-1: Blank Qualifications

Sample Result	Sample Value	Reviewer Qualifier(s)
Less than LOQ and blank result is <, > or = LOQ	Leave as reported	U
≥LOQ, blank result is <LOQ	Leave as reported	None
≥LOQ, blank result is >LOQ and sample result <blank result	Leave as reported	Use professional judgment
≥LOQ, blank result is >LOQ and sample result ≥blank result	Leave as reported	Use professional judgment
≥LOQ and blank result is = LOQ	Leave as reported	Use professional judgment

6. In the case wherein both the sample concentration and the blank concentration are greater than or equal to the LOQ, previously approved criteria as identified in the project planning documents may be applied to qualify associated sample results. Otherwise, qualify sample results as non-detect “U” when the sample concentration is less than or equal to 5 times the blank concentration (5× rule).
7. Instances of contamination can be attributable to the dilution process. These occurrences are difficult to determine; however, the reviewers should qualify the sample data as nondetects, “U,” when the reviewer determines the contamination to be from a source other than the sample.
8. In the event of gross contamination (i.e., saturated peaks) in the blanks, the associated samples must be evaluated for gross contamination. If gross contamination exists in the samples, the affected compounds should be qualified as unusable, “R.”

Level D:

1. Verify from the preparation log that the information recorded on Form IV (or equivalent) is correct.
2. Review the results of all blank raw data and Form I (or equivalent) to ensure that there were no false negatives or false positives.
3. Verify all target compound detects found in the method blanks against the raw data. Follow the guidelines specified in Sections 4.9 and 4.10 of this procedure. After the validity of the target compounds are verified, validate the corresponding data using the criteria outlined above for Level C and Level D validation.

4.5 Blank Spikes and Laboratory control Samples

Blank spike/laboratory control sample (LCS) recoveries must be within the QC limits specified in the DoD QSM Appendix C unless project-specific control limits are established for a given sample matrix. Use in-house limits if compounds are not listed in Appendix C or project limits are not specified.

Level C and Level D:

1. If the blank spike/LCS results are 0 percent, only the spiked compounds that showed low recovery in all associated samples shall be flagged as unusable "R" for nondetects and estimated "J" for detects.
2. If blank spike/LCS results are below the control limits (but above 0 percent), spiked compounds which showed low recovery in all associated samples shall be flagged as estimated "UJ" or "J."
3. If blank spike/LCS results are above the control limits, detects for only the spiked compounds which showed high recovery in all associated samples shall be flagged as estimated "J."
4. If the laboratory analyzes a blank spike duplicate/LCS duplicate (LCSD), evaluate and qualify the LCSD results using the criteria noted above.
5. If the relative percent differences (RPDs) between LCS and LCSD results are above the control limits (use the matrix spike [MS]/matrix spike duplicate [MSD] RPD control limits identified in DoD QSM Appendix B, if none are available use laboratory in-house limits), spiked compounds which showed high RPD in all associated samples shall be flagged as estimated "UJ" or "J."

Level D:

To verify that the spike percent recovery was calculated and reported correctly using the following equation, recalculate one spike recovery per matrix (and any spike that would result in the qualification of a sample).

$$\%\text{Recovery} = \frac{Q_d}{Q_a} \times 100$$

Where:

Q_d = Quantity determined by analysis

Q_a = Quantity added to samples/blanks

If transcription errors are discovered on Form III (or equivalent), request a resubmittal from the laboratory. Validate the data according to the criteria outlined above.

4.6 Surrogate Recovery

Laboratory performance on individual samples is established by means of surrogate spiking activities. All samples are spiked with surrogate compounds prior to sample preparation. The evaluation of the results of these surrogate spikes is not necessarily straightforward. The sample itself may produce effects because of factors such as interferences and high concentrations of compounds. Since the effects of the sample matrix are frequently outside the control of the laboratory and may present relatively unique problems, the review and validation of data based on specific sample results is frequently subjective and demands analytical experience and professional judgment. The following procedures shall be followed:

Level C and Level D:

Sample and blank surrogate recoveries for TPH must be within the QC limits specified in the DoD QSM Appendix C unless project-specific control limits are established. Use in-house limits if surrogates are not listed in Appendix C or project limits are not specified. Verify that no samples or blanks have surrogates outside the criteria from Form II (or equivalent).

1. If recovery is below the QC limits for any of the surrogates, but above or equal to 10 percent, flag associated positive results as estimated “J” and nondetects as “UJ.”
2. If any surrogate recovery is less than 10 percent, flag all nondetects as unusable “R” and detects as estimated “J.” No qualification is applied if surrogates are diluted beyond detection but note in the data validation report that surrogate evaluation could not be performed due to the high dilution factor.
3. If any surrogate recovery is above the upper QC limit, flag associated positive results as estimated “J.” No qualification of nondetects is necessary in the case of high recoveries.
4. Surrogates may be reported as “diluted out” (D); if dilution is such that the surrogate can no longer be detected. If this is the case, note in the data validation report that surrogate evaluation could not be performed due to a high dilution factor. A full evaluation of the sample chromatogram may be necessary to determine that surrogates are truly “diluted out.”

Level D:

The reported surrogate recoveries on Form II should be verified from the raw data for a representative number of samples.

4.7 MATRIX SPIKE/MATRIX SPIKE DUPLICATE

MS/MSD data are used to determine the effect of the matrix on a method’s recovery efficiency and precision for a specific sample matrix.

No action is taken on MS/MSD data alone to qualify an entire data package. Using informed professional judgment; however, the data reviewer may use the MS/MSD results in conjunction with other QC criteria (i.e., surrogates and LCS) and determine the need for some qualification of the data.

The data reviewer should first try to determine the extent to which the results of the MS/MSD affect the associated data. This determination should be made with regard to the MS/MSD sample itself, as well as specific compounds for all samples associated with the MS/MSD.

In those instances where it can be determined that the results of the MS/MSD affect only the sample spiked, then qualification should be limited to this sample alone. It may be determined through the

MS/MSD results, however, that a laboratory is having a systematic problem in the analysis of one or more compounds, which affects all associated samples.

Note: If a field blank was used for the MS/MSD, the information must be included in the data validation summary. Sample matrix effects have not been observed with field blanks therefore the recoveries and precision do not reflect the analytical impact of the site matrix.

Level C and Level D:

The laboratory must spike and analyze a MS/MSD from the specific project site as required for each matrix type and analytical batch.

1. MS/MSD data should be reported on a MS/MSD summary form similar to Form III (or equivalent).
2. Compare the percent recovery (%R) and RPD for each spiked compound with the QC limits specified in the DoD QSM Appendix C unless project-specific control limits are established. Use in-house limits if spiked compounds are not listed in Appendix C or project limits are not specified.
3. If MS/MSD results are 0 percent, only the spiked compounds that showed low recovery in the parent sample shall be flagged as unusable "R" for nondetects and estimated "J" for detects.
4. If MS/MSD results are below the control limits (but above 0 percent), spiked compounds which showed low recovery in the parent sample shall be flagged as estimated "UJ" or "J."
5. If MS/MSD results are above the control limits, detects for only the spiked compounds which showed high recovery in the parent sample shall be flagged as "J."
6. If the RPDs between MS and MSD results are greater than 30 percent, detects for only the spiked compounds which showed high RPD in the parent sample shall be flagged as estimated "J."
7. Failure of MS/MSD due to the presence of a target compound in the parent sample at greater than 2 times the spike concentration and or diluted by more than a factor of 2 should not result in any qualifications. Note the incident in the data validation report.

Level D:

Check the raw data and recalculate one or more %Rs and RPDs, especially %Rs and RPDs that resulted in the qualification of data, using the following equations to verify that results on Form III (or equivalent) are correct.

$$\%R = \frac{(SSR - SR)}{SA} \times 100$$

$$RPD = \frac{ABS|SSR - SDR|}{(SSR + SDR)/2} \times 100$$

Where:

SA	=	spike added
SR	=	sample result
SSR	=	spiked sample result
SDR	=	spiked duplicate result
ABS	=	absolute value

If transcription errors are discovered on Form III (or equivalent), request a resubmittal from the laboratory. Validate the data according to the criteria outlined above.

4.8 FIELD QC SAMPLES

Field QC samples discussed in this section of the procedures are equipment blanks, field blanks, field duplicates, and field triplicates.

4.8.1 Equipment Blanks and Field Blanks

Compounds detected in equipment blanks indicate the possibility of cross-contamination between samples due to improper equipment decontamination.

A field blank sample may be collected from each source of water used during each sampling event. The field blank may be analyzed to assess whether the chemical nature of the water used in decontamination may have affected the analytical results of site samples.

If TPH compounds are detected in the equipment blanks and/or field blanks, the procedure for the qualification of associated sample results is identical to the criteria outlined in Section 4.4 of this procedure.

Level C and Level D:

1. Determine which field QC samples apply to samples in the sample deliver group.
2. Ensure that units are correct when applying field QC blank qualifications. If samples are soil matrix, results must first be converted to micrograms per liter from micrograms per kilogram to make correct comparisons.
3. Because of the way in which the field blanks and equipment blanks are sampled, equipment blanks are not qualified because of field blank contamination. The affected samples are qualified, however, by either the field blank or equipment blank results, whichever has the higher contaminant concentration.
4. Equipment blanks and field blanks are only qualified with method blank results in order to account for laboratory contamination.

Level D:

Compound identification and quantification of field blank and equipment blank samples must be verified. Follow the guidelines specified in Sections 4.9 and 4.10 of this procedure.

4.8.2 Field Duplicates and Field Triplicates

Field duplicates consist of either collocated or subsampled samples. Field duplicates for ground water and surface water samples are generally considered to be collocates. Soil duplicate samples may be homogenized and subsampled in the field (or at the laboratory) to form an original and duplicate sample, or may be an additional volume of sample collected in a separate sample container to form a collocate sample. Field duplicate results are an indication of both field and laboratory precision; the results may be used to evaluate the consistency of sampling practices.

Field triplicates are collected from different, randomly selected locations to verify that an incremental sample truly represents a decision unit. Field triplicate results are more useful than field duplicates to statistically evaluate sampling precision.

Level C and Level D:

1. Check to ensure that field duplicates were collected and analyzed as specified in the project planning documents. If the sampling frequency is less than the frequency stated in the planning documents, no qualification of the associated sample results is necessary but the incident shall be discussed in the data validation report.
2. For field duplicate results, if the RPDs are greater than 50 percent for water or 100 percent for soil or as stated in the planning document if more conservative, no qualification of the associated sample results is necessary, but the differences should be noted in the data validation summary.
3. For field triplicate results, if the RSDs are greater than the QC limits stated in the planning document, no qualification of the associated sample results is necessary, but the differences should be noted in the data validation summary.

Level D:

Before comparison of duplicates and/or triplicates, the compound identification and quantification must be verified. Follow the guidelines specified in Sections 4.9 and 4.10 of this procedure.

4.9 TARGET COMPOUND IDENTIFICATION

Qualitative criteria for compound identification have been established to minimize the number of erroneous identifications of compounds. An erroneous identification can be either a false positive (reporting a compound present when it is not) or a false negative (not reporting a compound that is present).

Level C:

Compound identification is not verified for Level C validation.

Level D:

1. Review Form I or equivalent. Check for errors.

2. Verify that the retention times of sample compounds reported on the Form X or equivalent fall within the calculated retention time windows.
3. Evaluate all sample chromatograms to ensure that the TPH results were properly identified. Presence of unknown single peaks may result in false positives or false negatives. The reviewer should use professional judgment in evaluating the effect of interference.

4.10 COMPOUND QUANTITATION AND REPORTING LIMITS

The objective is to ensure that the reported quantitation results and reporting limits (i.e., LOQ, LOD, detection limit [DL]) are accurate. All soil sample results are reported on a dry weight basis.

Level C:

Specific compound quantitation is not verified for Level C validation.

Level C and Level D:

1. Verify that the reporting limits for nondetects are equal to the LODs. Verify that an annual DL study was performed or quarterly LOD/LOQ verification checks were performed in accordance with the DoD QSM. The LOD/LOQ verification check must be evaluated to determine whether the laboratory can reliably detect and identify all target analytes at a spike concentration of approximately two times but not more than four times the current reported DL. Qualify nondetects as unusable "R."
2. Check that reported nondetects and positive values have been adjusted to reflect sample dilutions and for soil samples, sample moisture. When a sample is analyzed at more than one dilution, the lowest LODs are used unless a QC criterion has been exceeded. In this case, the higher LODs from the diluted analysis are used. The least technically sound data will be flagged "R" with a qualification code "D."
3. Verify that reported limits for soils and sediments were calculated based on dry weight. If the LOQs/LODs were reported based on wet weight, the percent moisture must be factored in and the LOQs/LODs must be adjusted accordingly.
4. If a sample requiring a dilution analysis due to a target compound detect exceeding the calibration linear range was not re-analyzed at a dilution, the compound exceeding calibration range shall be qualified as estimated "J."
5. If the laboratory re-analyzed a sample and submitted both sample results, the reviewer must determine which of the two analyses has better data quality. Only one analysis should be reported and the other is rejected.

Level D:

1. Compound quantification should be verified by recalculation from the raw data for a representative number of samples.
2. Verify from the standard chromatograms that the instrument sensitivity is adequate to support the LODs. Poor sensitivity may result in elevated LODs.

5. Records

A Form I that has been validated and verified, and has been determined by the data validator to accurately represent the appropriate sample results to be utilized, shall be stamped "NAVFAC PACIFIC VALIDATED." Additionally, sample result forms for which the data has been validated at the Level D validation level shall be stamped or noted "Level D."

Copies of all documents generated by the data validation personnel will be stored for no less than 10 years. The original validated laboratory data shall be archived to the Federal Records Center at project completion.

6. References

Department of Defense, United States (DoD). 2005a. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

———. 2005b. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2B: Quality Assurance/quality Control Compendium: Minimum QA/QC Activities*. Final Version 1. DoD: DTIC ADA 426957, EPA-505-B-04-900B. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www2.epa.gov/sites/production/files/documents/qaqc_v1_0305.pdf.

———. 2012. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2A: Optimized UFP-QAPP Worksheets*. Revision 1. March.

———. 2013. *Department of Defense Quality Systems Manual for Environmental Laboratories.* Version 5.0. Draft Final. Prepared by DoD Environmental Data Quality Workgroup and Department of Energy Consolidated Audit Program Operations Team. July.

Environmental Protection Agency, United States (EPA). 2007. *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846.* 3rd ed., Final Update IV. Office of Solid Waste. Updates available: www.epa.gov/epaoswer/hazwaste/test/new-meth.htm.

Procedure II-A, *Data Validation*.

7. Attachments

None.

Laboratory QC Samples (Water, Soil)

1. Purpose

This section sets forth the standard operating procedure for identifying the number and type of laboratory quality control (QC) samples that will be analyzed during each contract task order (CTO) associated with the United States Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific. Laboratory QC analyses serve as a check on the precision and accuracy of analytical methods and instrumentation, and the potential contamination that might occur during laboratory sample preparation and analyses. Laboratory QC analyses include blank, surrogate, blank spike, laboratory control sample (LCS), and matrix spike (MS)/matrix spike duplicate (MSD) analyses. These laboratory QC analyses are discussed in general below.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the most recent version of the Uniform Federal Policy-Quality Assurance Project Plan (UFP QAPP) Part 1 (DoD 2005a), 2A (DoD 2012), and 2B (2005b), as well as the DoD Quality Systems Manual (DoD 2013). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

3.1 PRECISION

Precision is the degree to which a set of observations or measurements of the same property, obtained under similar conditions, conform to themselves. Precision is usually expressed as a standard deviation, variance, or range, in either absolute or relative terms. Examples of QC measures for precision include laboratory duplicates, laboratory triplicates, and matrix spike/matrix spike duplicates.

3.2 ACCURACY

Accuracy is the degree of agreement between an observed value and an accepted reference value. Accuracy includes a combination of random error (precision) and systematic error (bias), components which are due to sampling and analytical operations. Examples of QC measures for accuracy include performance evaluation samples, matrix spikes, LCSs, and equipment blanks.

3.3 MATRIX

A specific type of medium (e.g., surface water, drinking water), in which the analyte of interest may be contained. Medium is a substance (e.g., air, water, soil), which serves as a carrier of the analytes of interest (EPA 2010).

3.4 Method Blank

An analyte-free matrix (water, soil, etc.) subjected to the entire analytical process to demonstrate that the analytical system itself does not introduce contamination.

3.5 Matrix Spike

A sample prepared by adding a known concentration of a target analyte to an aliquot of a specific homogenized environmental sample for which an independent estimate of the target analyte concentration is available. The MS is accompanied by an independent analysis of the unspiked aliquot of the environmental sample. Spiked samples are used to determine the effect of the matrix on a method's recovery efficiency.

3.6 Laboratory Control Samples and Blank Spikes

A sample of known composition prepared using reagent-free water or an inert solid that is spiked with analytes of interest at the midpoint of the calibration curve or at the level of concern. It is analyzed using the sample preparation, reagents, and analytical methods employed for regular samples.

3.7 Surrogates

A pure substance with properties that mimic the analyte of interest (organics only). Surrogates are typically brominated, fluorinated, or isotopically labeled compounds unlikely to be found in environmental samples. These analytes are added to samples to evaluate analytical efficiency by measuring recovery.

3.8 Internal Standards

A pure substance added to both samples and laboratory standards at a known concentration with the purpose of providing a basis of comparison in the quantitation of analytes of interest. Internal standards are primarily used to increase the accuracy and precision of analytical methods where the primary source of variability is in sample preparation or sample injection on instrument.

4. Responsibilities

The prime contractor's QA Manager or Technical Director, as well as QC coordinators are responsible for ensuring that sample analytical activities during all CTOs are in compliance with this procedure.

The CTO QC Coordinators and the Laboratory Manager are responsible for identifying instances of non-compliance with this procedure and ensuring that future laboratory analytical activities are in compliance with it.

5. Procedures

Laboratory QC checks include all types of samples specified in the requested analytical methods, such as the analysis of laboratory blank, duplicate, and MS samples. QC requirements are specified in each analytical method and in Appendix B, *Quality Control Requirements*, and Appendix C, *Laboratory Control Sample (LCS) Control Limits and Requirements*, of the *Department of Defense Quality Systems Manual for Environmental Laboratories* Version 5.0 (or most current version)

(DoD QSM). Types of QC samples are discussed in general below. Detailed discussion and minimum QA/QC requirements are presented in the DoD QSM (DoD 2013).

A comprehensive discussion of the minimum number of laboratory QC samples can be found in the *Uniform Federal Policy for Quality Assurance Project Plans, Part 2B, Quality Assurance/Quality Control Compendium: Minimum QA/QC Activities* (DoD 2005b). However, additional QA/QC samples may be necessary based on the project quality objectives. Information pertaining to laboratory QC samples shall be documented in Worksheet 28 Laboratory QC Samples Table of the project UFP QAPP-style planning document.

5.1 LABORATORY BLANKS

Laboratory blank samples are analyzed to assess the degree to which laboratory contamination by reagent or method preparation may have affected sample analytical results. At a minimum, one laboratory blank will be analyzed per matrix per analytical method for each batch of at most 20 samples. In evaluating the blank results, all blank data are reviewed to identify any compounds detected in the blanks. The laboratory shall be contacted to discuss detection of analytes in blank samples only in the event of unusual contamination, but not for common laboratory contaminants at low levels. The following compounds are considered to be common laboratory contaminants: acetone, methylene chloride, 2-butanone, and common phthalate esters. The data for samples analyzed during the same time period as the blank are then evaluated to identify the presence of any contaminants found in the blanks. The presence of the blank contaminants found in associated samples is then evaluated to avoid potential misinterpretation of actual sample constituents. Briefly, as discussed in the data validation procedures, any analyte detected above the LOQ in both the sample and the associated blank is qualified as not detected if the sample concentration is less than five times the blank concentration (5× rule). For common laboratory contaminants (methylene chloride, acetone, 2-butanone, and common phthalate esters), a 10× rule applies.

5.2 LABORATORY REPLICATES (DUPLICATES AND TRIPLICATES)

Replicates are analyzed to evaluate the reproducibility, or precision, of the analytical procedures for a given sample. A replicate is two (duplicates) or three (triplicates) representative portions taken from one homogeneous sample by the laboratory and analyzed in the same laboratory (DoD 2005a). One duplicate sample is analyzed for each batch of twenty samples analyzed in a given matrix. Lab triplicates are assigned by the field team and identified on the chain of custody. The identification of a sample for lab triplicate analysis is typically selected from one of the field triplicates to allow for the evaluation of total study error of the sampling and analysis process. Duplicate analyses are normally performed on sample portions analyzed for inorganic constituents. For organic analyses, duplicate analyses are performed on MS samples (Section 5.5 of this procedure).

5.3 SURROGATES

Surrogate compounds must be added to all samples, standards, and blanks for all organic chromatography methods except when the matrix precludes its use or when a surrogate is not available. Poor surrogate recovery may indicate a problem with the sample composition and shall be reported to the client whose sample produced the poor recovery. Surrogate compounds to be included for organic analysis are specified in each analytical method.

5.4 LABORATORY CONTROL SAMPLES AND BLANK SPIKES

LCSs are used to demonstrate that the laboratory process for sample preparation and analysis is under control.

Analytes selected for spiking of LCSs are usually the same compounds used to spike MS/MSD samples and are representative target compounds. Control limits for LCS recoveries are provided in Appendix C of DoD QSM. If no control limits for LCS recoveries are listed in Appendix C of the DoD QSM for a given analyte, the laboratory's in-house derived control limits should be used.

For wet chemistry methods, a single spike of an appropriate control for each method may be used for LCS analyses (i.e., cyanide, a control standard of sodium cyanide from a source other than that used for calibration may be spiked into water samples and analyzed with the water samples). LCSs should be analyzed at a frequency of one per batch of at most twenty samples analyzed of similar matrix.

5.5 MATRIX SPIKES/MATRIX SPIKE DUPLICATES

MS analyses are conducted by the laboratory to assess the accuracy of specific analytical methods and to provide information on the effect of the sample matrix on the analytical methodology. Spike analyses are performed by adding compounds of known concentration to a sample, an unspiked portion of which has previously been analyzed or is concurrently analyzed. The spiked analytes are representative target compounds for each analytical method performed. The spiked sample results are evaluated with the original sample results to evaluate any effects the matrix has on the analysis. One MS is analyzed for each batch of at most 20 samples of similar matrix. Since MS samples only provide information about the specific sample matrix used for the spike, MS analyses should be performed for each type of matrix collected.

For the MSD, a separate aliquot of the sample is separately spiked and analyzed. As discussed in Section 5.2, results of MSD analyses are expressed as a relative percent difference, which is calculated by dividing the difference in concentration between the MSD and the MS sample analyses by the arithmetic mean of their concentrations. One MSD analysis is required for at most each 20 samples of similar matrix.

Acceptance criteria for both the MS and the MSD are based on historic laboratory performance and are laboratory-specific. As a general rule, the acceptance criteria should be no more stringent than the LCS acceptance criteria.

It is important to note that the UFP QAPP Part 2B, QA/QC Compendium: Minimum QA/QC Activities (DoD 2005b) states that for organic analysis, MS and MSDs are not considered a minimum QC activity as long as surrogate spikes properly mimic the analytes of concern and can identify matrix effects. Project quality objectives should be evaluated to determine if organic MS/MSDs are useful for individual projects.

6. Records

Records of QC samples analyzed during ER Program CTO activities will be maintained on laboratory bench sheets, raw data sheets, in the laboratory computerized data system, and on QC summary forms, as requested. Analytical laboratories maintain records in accordance with their quality assurance manual (QAM) as part of performing environmental analytical work under DoD.

Records shall be maintained in accordance with the analytical laboratory subcontract agreement specifications or the laboratory-specific QAM, whichever is more stringent.

7. Health and Safety

Applicable to laboratory personnel only.

8. References

Department of Defense, United States (DoD). 2005a. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

———. 2005b. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2B: Quality Assurance/quality Control Compendium: Minimum QA/QC Activities*. Final Version 1. DoD: DTIC ADA 426957, EPA-505-B-04-900B. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/swerffrr/pdf/-qaqc_v1_0305.pdf.

———. 2012. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2A: Optimized UFP-QAPP Worksheets*. Revision 1. March.

———. 2013. *Department of Defense Quality Systems Manual for Environmental Laboratories.* Version 5.0. Final. Prepared by DoD Environmental Data Quality Workgroup and Department of Energy Consolidated Audit Program Operations Team. July.

Environmental Protection Agency, United States (EPA). 2010. Environmental Monitoring and Assessment Program: QA Glossary. November 8. On-line updates available at: http://www.epa.gov/emfjulte/html/pubs/docs/resdocs/qa_terms.html#mm. Accessed 2015.

Procedure I-A-7, *Analytical Data Validation Planning and Coordination.*

9. Attachments

None.

Field QC Samples (Water, Soil)

1. Purpose

This standard operating procedure describes the number and types of field quality control (QC) samples that will be collected during United States Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific site field work.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the most recent version of the Uniform Federal Policy-Quality Assurance Project Plan Part 1 (DoD 2005a), 2A (DoD 2012), and 2B (2005b), as well as the DoD Quality Systems Manual (DoD 2013). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the Contract Task Order (CTO) Manager and the Quality Assurance (QA) Manager or Technical Director, as well as QC coordinators responsible for compliance with the procedure. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

3.1 Trip Blank

Trip blanks are samples that originate from organic-free water (e.g., ASTM Type II water, high performance liquid chromatography grade water, etc.) prepared by the laboratory, shipped to the sampling site, and returned to the laboratory with samples to be analyzed for volatile organic compounds (VOCs). Trip blanks are analyzed to assess whether contamination was introduced during sample shipment (DoD 2005a). Trip blanks are prepared using the same sample container (typically a 40 ml VOA vial) as that used to collect field samples.

3.2 Equipment Blank Samples

An equipment blank (i.e., “decontamination rinsate,” or “equipment rinsate”) sample consists of a sample of water free of measurable contaminants poured over or through decontaminated field sampling equipment that is considered ready to collect or process an additional sample. Equipment blanks are to be collected from non-dedicated sampling equipment to assess the adequacy of the decontamination process.

3.3 Field Blanks

A blank used to provide information about contaminants that may be introduced during sample collection, storage, and transport. It can also be a clean sample carried to the sampling site, exposed to sampling conditions, transported to the laboratory, and treated as an environmental sample.

3.4 Field Duplicate

A generic term for two field samples taken at the same time in approximately the same location is referred to as a field duplicate. The location of the duplicate (distance and direction from primary sample) should be specified in the project planning documents. They are intended to represent the same population and are taken through all steps of the analytical procedure in an identical manner and provide precision information for the data collection activity. There are two categories of field duplicate samples defined by the collection method: co-located field duplicates and subsample field duplicates. Co-located field duplicates are two or more independent samples collected from side-by-side locations at the same point in time and space so as to be considered identical. Co-located samples are collected from adjacent locations or liners (e.g., laterally or vertically, in separate containers), or water samples collected from the same well at the same time that have not been homogenized. Subsample field duplicates samples are obtained from one sample collection at one sample location.

3.5 Field Replicates

Two or more field replicates are used with incremental sampling approaches to statistically evaluate the sampling precision or error for each decision unit (DU). The location of the replicates (distance and direction from primary sample) and the number of DUs with replicates should be specified in the project planning documents. Increments for replicate samples are collected from completely separate locations (i.e., separate systematic random or stratified random grid). Triplicate samples (i.e., primary incremental sample plus two replicates) are required for incremental sampling and are more useful than just duplicates for statistical evaluation. The replicate samples are collected, prepared, and analyzed in the same manner as carried out for the primary sample.

3.6 Temperature Indicators (Blanks)

A temperature indicator sample is often referred to as a temperature blank, but it is not analyzed nor does it measure introduced contamination. It may be a small sample bottle or VOA vial filled with distilled water that is placed in each shipping container to evaluate if samples were adequately cooled during sample shipment.

3.7 Source Water

Source water is water free from measurable contaminants that is used as the final decontamination rinse water.

4. Responsibilities

The prime contractor CTO Manager and QA Manager or Technical Director are responsible for ensuring that field QC samples are collected and analyzed according to this procedure. The CTO Manager is responsible for ensuring that all personnel involved in sampling or testing shall have the appropriate education, experience, and training to perform their assigned tasks as specified in Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

The prime contractor QC Coordinator is responsible for determining the QC sample requirements.

The Laboratory Manager is responsible for ensuring that field QC samples are analyzed according to the specifications of the project statement of work and the analytical methods used.

The Field Manager is responsible for ensuring that all project field staff follow these procedures.

Field sampling personnel are responsible for the implementation of this procedure.

5. Procedures

Field QC checks may include submission of trip blank, equipment blank, field blank, duplicate, triplicate, and temperature indicator (blank) samples to the laboratory. Types of field QC samples are discussed in general below. Table III-B-1 identifies the minimum frequency at which field QC samples should be collected, with the actual frequency to be determined by the individual project needs. For additional information on field QC frequency, see the State of Hawaii Department of Health 2009 *Technical Guidance Manual for the Implementation of the Hawaii State Contingency Plan*.

A comprehensive discussion of the minimum types and numbers of field QC samples can be found in the *Uniform Federal Policy for Quality Assurance Project Plans, Part 2B, Quality Assurance/Quality Control Compendium: Minimum QA/QC Activities* (DoD 2005).

Table III-B-1: Field QC Samples per Sampling Event

Type of Sample	Minimum QC Sample Frequency	
	Metals	Organic
Trip blank (for volatiles only)	N/A	1/analytical method/cooler
Equipment blank	5%	5%
Field blank	1/decontamination water source/event [a]/for all analytes	
Field replicates [b]	10%	10%
Temperature Indicator (blank)	1/shipping container	

% percent
N/A not applicable
[a] A sampling event is considered to be from the time sampling personnel arrive at a site until they leave for more than a week. The use of controlled-lot source water makes one sample per lot, rather than per event, an option.
[b] To the extent practical, field replicates should be collected from the same locations as the samples designated for a laboratory matrix spike/matrix spike duplicate (organic analysis) where applicable, or from the sample used as a laboratory duplicate (inorganic analysis).

5.1 Trip Blanks

The laboratory prepares trip blanks using organic-free water, and then sends them to the field. The laboratory shall place trip blanks in sample coolers prior to transport to the site so that they accompany the samples throughout the sample collection/handling/transport process. Once prepared, trip blanks should not be opened until they reach the laboratory. One set of two 40-milliliter vials per volatile analysis forms a trip blank and accompanies each cooler containing samples to be analyzed for volatiles. Trip blanks are only analyzed for volatiles. Results of trip blank analyses are used to assess whether samples have been contaminated by volatiles during sample handling and transport to the laboratory.

Trip blanks are not typically associated with tissue samples; however, project-specific quality objectives shall determine if trip blanks for tissue samples are required.

5.2 Equipment Blank Samples

Collect equipment blank samples by pumping the source water over and/or through the decontaminated sampling equipment. Collect this runoff water into the sample containers directly or with the use of a funnel, if necessary. The source water may be pumped or poured by tipping the jug of water upside down over the equipment. Results of equipment blank samples are used to evaluate whether equipment decontamination was effective.

At a minimum, equipment blank samples should be collected at a rate of 5 percent of the total samples planned for collection for each sampling technique used. This rate may be adjusted depending on the nature of the investigation (site inspection, remedial investigation, remedial site evaluation, long-term monitoring) and the associated project quality objectives (PQOs). Equipment blank samples will be analyzed for the same parameters as the samples collected with that particular equipment. If analytes pertinent to the project are found in the equipment blanks, the frequency of equipment blank samples may be increased after decontamination procedures have been modified to further evaluate the effectiveness of the decontamination procedure.

When disposable or dedicated sampling equipment is used, equipment blank samples do not need to be collected.

Sampling devices (e.g., gloved hands, dip nets, or traps) used for collection of tissue samples are generally non-intrusive into the organisms collected, so equipment blank samples will not be collected as long as the devices have been properly cleaned following Procedure I-F, *Equipment Decontamination*, and appear clean.

5.3 Field Blanks

Field blanks, consisting of samples of the source water used as the final decontamination rinse water, will be collected on site by field personnel by pouring the source water into sample containers and then analyzed to assess whether contaminants may have been introduced during sample collection, storage, and transport.

The final decontamination rinse water source (the field blank source water) and equipment blank source water should all be from the same purified water source. Tap water used for steam cleaning augers or used in the initial decontamination buckets need not be collected and analyzed as a field blank since augers typically do not touch the actual samples and the final decontamination rinse water should be from a purified source.

Field blanks should be collected at a minimum frequency of one per sampling event per each source of water. A sampling event is considered to be from the time sampling personnel arrive at a site until they leave for more than a week. Field blanks will be analyzed for the same parameters as the samples collected during the period that the water sources are being used for decontamination. Additional field blanks may be required based on PQOs.

5.4 Field Duplicates

Field duplicates consist of either co-located or subsampled samples. Field duplicates for ground water and surface water samples are generally considered to be co-located samples. Soil duplicate samples may be homogenized and subsampled in the field (or at the laboratory) to form an original and duplicate sample, or may be an additional volume of sample collected in a separate sample container to form a co-located sample.

The interpretation of co-located duplicate data may be more complex than subsample duplicate data because of the number of variables associated with the results of this type of duplicate sample. Duplicate soil samples for VOC analysis shall always be co-located (i.e., not homogenized or otherwise processed or subsampled). Duplicates will be analyzed for the same analytical parameters as their associated original sample. Collection of both co-located and subsampled versions of the same sample may be performed to aid in approximating sampling and analysis error.

Field duplicates for biological tissue samples will consist of subsamples of the original sample. Twice the required volume of organisms for one sample will be collected and placed into one food-grade, self-sealing bag. The sample will later be homogenized in the laboratory and subsampled, producing an original and a duplicate sample. Tissue duplicate samples will be analyzed for the same analytical parameters as their associated original samples.

5.5 FIELD REPLICATES

Field replicates are completely separate incremental replicate samples (collected from a set of systematic random or stratified random locations within the DU that are different from those used for the primary incremental samples). A different random starting location is determined for each replicate collected in the selected DU. Field replicates are typically collected in sets of three (the primary sample and two replicate samples) to produce a triplicate.

Replicate sample increments are collected from the same sampling grid established through the DU for the primary incremental sample, though at different systematic random locations than initially used. The replicate increments should not be collected from the same points or co-located with those used for the primary incremental sample. Replicate samples are sent to the laboratory as “blind” samples, meaning the laboratory does not know they represent replicate samples of the primary incremental sample.

5.6 TEMPERATURE INDICATORS (BLANKS)

Temperature indicators (blanks) may be prepared in the lab or field by filling a small sample bottle or VOA vial with distilled water and sealing the container. One temperature indicator sample should be placed in each sample cooler or shipping container. Upon arrival at the laboratory, the temperature of the bottle is measured to determine if samples were adequately cooled during the shipment.

6. Records

Records of QC samples analyzed during ER Program CTO activities will be maintained on laboratory bench sheets, raw data sheets, in the laboratory computerized data system, and on QC summary forms, as requested. Analytical laboratories maintain records in accordance with their quality assurance manual (QAM) as part of performing environmental analytical work under DoD. Records shall be maintained in accordance with the analytical laboratory subcontract agreement specifications or the laboratory-specific QAM, whichever is more stringent.

7. Health and Safety

Field personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2008) and site-specific health and safety plan.

8. References

Department of Defense, United States (DoD). 2005a. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

———. 2005b. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2B: Quality Assurance/quality Control Compendium: Minimum QA/QC Activities*. Final Version 1. DoD: DTIC ADA 426957, EPA-505-B-04-900B. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/swerffrr/pdf/-qaqc_v1_0305.pdf.

———. 2012. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2A: Optimized UFP-QAPP Worksheets*. Revision 1. March.

———. 2013. *Department of Defense Quality Systems Manual for Environmental Laboratories*. Version 5.0. Draft Final. Prepared by DoD Environmental Data Quality Workgroup and Department of Energy Consolidated Audit Program Operations Team. July.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual*. EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure I-F, *Equipment Decontamination*.

Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody*.

9. Attachments

None.

Logbooks

1. Purpose

This standard operating procedure describes the activities and responsibilities pertaining to the identification, use, and control of logbooks and associated field data records for use by United States Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific personnel.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management approved professional guidance for the ER Program and is consistent with protocol in the most recent version of the Uniform Federal Policy-Quality Assurance Project Plan Appendix A. Section 1.4 *Field Documentation SOPs* (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the Contract Task Order (CTO) Manager and the Quality Assurance Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

3.1 LOGBOOK

A logbook is a bound field notebook with consecutively numbered, water-repellent pages that is clearly identified with the name of the relevant activity, the person assigned responsibility for maintenance of the logbook, and the beginning and ending dates of the entries.

3.2 DATA FORM

A data form is a predetermined format used for recording field data that may become, by reference, a part of the logbook (e.g., soil boring logs, trenching logs, surface soil sampling logs, groundwater sample logs, and well construction logs are data forms).

4. Responsibilities

The prime contractor CTO Manager or delegate is responsible for determining which team members shall record information in field logbooks and for obtaining and maintaining control of the required logbooks. The CTO Manager shall review the field logbook on at least a monthly basis. The CTO Manager or designee is responsible for reviewing logbook entries to determine compliance with this procedure and to ensure that the entries meet the project requirements.

A knowledgeable individual such as the Field Manager, CTO Manager, or quality control (QC) Supervisor shall perform a technical review of each logbook at a frequency commensurate with the level of activity (weekly is suggested, or, at a minimum, monthly). Document these reviews by the dated signature of the reviewer on the last page or page immediately following the material reviewed.

The Field Manager is responsible for ensuring that all project field staff follow these procedures and that the logbook is completed properly and daily. The Field Manager is also responsible for submitting copies to the CTO Manager, who is responsible for filing them and submitting a copy to the Navy (if required by the CTO Statement of Work).

The logbook user is responsible for recording pertinent data into the logbook to satisfy project requirements and for attesting to the accuracy of the entries by dated signature. The logbook user is also responsible for safeguarding the logbook while having custody of it.

Field personnel are responsible for the implementation of this procedure.

All NAVFAC Pacific ER Program field personnel are responsible for complying with Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

5. Procedure

The field logbook serves as the primary record of field activities. Make entries chronologically and in sufficient detail to allow the writer or a knowledgeable reviewer to reconstruct the applicable events. Store the logbook in a clean location and use it only when outer gloves used for personal protective equipment (PPE) have been removed.

Individual data forms may be generated to provide systematic data collection documentation. Entries on these forms shall meet the same requirements as entries in the logbook and shall be referenced in the applicable logbook entry. Individual data forms shall reference the applicable logbook and page number. At a minimum, include names of all samples collected in the logbook even if they are recorded elsewhere.

Enter field descriptions and observations into the logbook, as described in Attachment III-D-1, using indelible black ink.

Typical information to be entered includes the following:

- Dates (month/day/year) and times (military) of all onsite activities and entries made in logbooks/forms
- Site name, and description
- Site location by longitude and latitude, if known
- Weather conditions, including estimated temperature and relative humidity
- Fieldwork documentation, including site entry and exit times
- Descriptions of, and rationale for, approved deviations from the work plan or field sampling plan
- Field instrumentation readings
- Names, job functions, and organizational affiliations of personnel on-site

- Photograph references
- Site sketches and diagrams made on-site
- Identification and description of sample morphology, collection locations and sample numbers as described in Procedure I-A-8, *Sample Naming*
- Sample collection information, including dates (month/day/year) and times (military) of sample collections, sample collection methods and devices, station location numbers, sample collection depths/heights, sample preservation information, sample pH (if applicable), analysis requested (analytical groups), etc., as well as chain-of-custody (COC) information such as sample identification numbers cross-referenced to COC sample numbers
- Sample naming convention
- Field QC sample information
- Site observations, field descriptions, equipment used, and field activities accomplished to reconstruct field operations
- Meeting information
- Important times and dates of telephone conversations, correspondence, or deliverables
- Field calculations
- PPE level
- Calibration records
- Contractor and subcontractor information (address, names of personnel, job functions, organizational affiliations, contract number, contract name, and work assignment number)
- Equipment decontamination procedures and effectiveness
- Laboratories receiving samples and shipping information, such as carrier, shipment time, number of sample containers shipped, and analyses requested
- User signatures

The logbook shall reference data maintained in other logs, forms, etc. Correct entry errors by drawing a single line through the incorrect entry, then initialing and dating this change. Enter an explanation for the correction if the correction is more than for a mistake.

At least at the end of each day, the person making the entry shall sign or initial each entry or group of entries.

Enter logbook page numbers on each page to facilitate identification of photocopies.

If a person's initials are used for identification, or if uncommon acronyms are used, identify these on a page at the beginning of the logbook.

At least weekly and preferably daily, the preparer shall photocopy (or scan) and retain the pages completed during that session for backup. This will prevent loss of a large amount of information if the logbook is lost.

6. Records

Retain the field logbook as a permanent project record. If a particular CTO requires submittal of photocopies of logbooks, perform this as required.

7. Health and Safety

Store the logbook in a clean location to keep it clean and use it only when outer gloves used for PPE have been removed.

8. References

Department of Defense, United States (DoD). 2005a. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

Procedure I-A-8, *Sample Naming.*

9. Attachments

Attachment III-D-1: Description of Logbook Entries

Record Keeping, Sample Labeling, and Chain-Of-Custody

1. Purpose

The purpose of this standard operating procedure is to establish standard protocols for all United States (U.S.) Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific field personnel for use in maintaining field and sampling activity records, writing sample logs, labeling samples, ensuring that proper sample custody procedures are used, and completing chain-of-custody/analytical request forms.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the most recent version of the Uniform Federal Policy-Quality Assurance Project Plan (UFP QAPP) Part 1 (DoD 2005a), 2A (DoD 2012), and 2B (2005b), as well as the DoD Quality Systems Manual (DoD 2013). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

3.1 LOGBOOK

A logbook is a bound field notebook with consecutively numbered, water-repellent pages that is clearly identified with the name of the relevant activity, the person responsible for maintenance of the logbook, and the beginning and ending dates of the entries.

3.2 CHAIN-OF-CUSTODY

Chain-of-custody (COC) is documentation of the process of custody control. Custody control includes possession of a sample from the time of its collection in the field to its receipt by the analytical laboratory, and through analysis and storage prior to disposal.

4. Responsibilities

The prime contractor CTO Manager is responsible for determining which team members shall record information in the field logbook and for checking sample logbooks and COC forms to ensure compliance with these procedures. The CTO Manager shall review COC forms on a monthly basis at a minimum.

The prime contractor CTO Manager and QA Manager or Technical Director are responsible for evaluating project compliance with the Project Procedures Manual. The QA Manager or Technical Director is responsible for ensuring overall compliance with this procedure.

The Laboratory Project Manager or Sample Control Department Manager is responsible for reporting any sample documentation or COC problems to the CTO Manager or CTO Laboratory Coordinator within 24 hours of sample receipt.

The Field Manager is responsible for ensuring that all field personnel follow these procedures. The CTO Laboratory Coordinator is responsible for verifying that the COC/analytical request forms have been completed properly and match the sampling and analytical plan. The CTO Manager or CTO Laboratory Coordinator is responsible for notifying the laboratory, data managers, and data validators in writing if analytical request changes are required as a corrective action. These small changes are different from change orders, which involve changes to the scope of the subcontract with the laboratory and must be made in accordance with a respective contract (e.g., Comprehensive Long-Term Environmental Action Navy, remedial action contract).

NAVFAC Pacific ER Program field personnel are responsible for following these procedures while conducting sampling activities. Field personnel are responsible for recording pertinent data into the logbook to satisfy project requirements and for attesting to the accuracy of the entries by dated signature. All NAVFAC Pacific ER Program field personnel are responsible for complying with Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

5. Procedures

This procedure provides standards for documenting field activities, labeling the samples, documenting sample custody, and completing COC/analytical request forms. The standards presented in this section shall be followed to ensure that samples collected are maintained for their intended purpose and that the conditions encountered during field activities are documented.

5.1 RECORD KEEPING

The field logbook serves as the primary record of field activities. Make entries chronologically and in sufficient detail to allow the writer or a knowledgeable reviewer to reconstruct each day's events. Field logs such as soil boring logs and groundwater sampling logs will also be used. These procedures are described in Procedure III-D, *Logbooks*.

5.2 SAMPLE LABELING

Affix a sample label with adhesive backing to each individual sample container with the exception of pre-tared containers. Record the following information with a waterproof marker (ballpoint pen for containers for volatile analyses) on each label:

- Project name or number (optional)
- COC sample number
- Date and time of collection
- Sampler's initials
- Matrix (optional)
- Sample preservatives (if applicable)

- Analysis to be performed on sample (This shall be identified by the method number or name identified in the subcontract with the laboratory)
- Indicate if sample is to be used as the matrix spike (MS)/matrix spike duplicate (MSD) or laboratory triplicate sample

With the exception of sample containers with pre-tared labels, place clear tape over each label (preferably prior to sampling) to prevent the labels from tearing off, falling off, or being smeared, and to prevent loss of information on the label.

These labels may be obtained from the analytical laboratory or printed from a computer file onto adhesive labels.

For volatile soil organic analyses (VOA), labels are not to be affixed to vials that are pre-tared by the laboratory. Instead, on each of the VOA vials in the sample set (typically three per sample), mark the sample COC Sample identification (ID) on the vial in ballpoint pen. Then wrap the vials together in bubble wrap and place one sample label on the bubble wrap and cover with tape. It is imperative that the COC Sample ID be clearly marked on each vial as this will help prevent laboratory error if the vials are inadvertently separated after removal from the bubble wrap.

5.3 CUSTODY PROCEDURES

For samples intended for chemical analysis, sample custody procedures shall be followed through collection, transfer, analysis, and disposal to ensure that the integrity of the samples is maintained. Maintain custody of samples in accordance with the U.S. Environmental Protection Agency (EPA) COC guidelines prescribed in U.S. Environmental Protection Agency (EPA) *NEIC Policies and Procedures*, National Enforcement Investigations Center, Denver, Colorado, revised August 1991 (EPA 1978); EPA *RCRA Ground Water Monitoring Technical Enforcement Guidance Document* (TEGD), *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA* (EPA OSWER Directive 9355 3-01) (EPA 1988, Appendix 2 of the *Technical Guidance Manual for Solid Waste Water Quality Assessment Test (SWAT) Proposals and Reports* (Cal/EPA 1988), and *Test Methods for Evaluating Solid Waste* (EPA 2007). A description of sample custody procedures is provided below.

5.3.1 Sample Collection Custody Procedures

According to the EPA guidelines, a sample is considered to be in custody if one of the following conditions is met:

- It is in one’s actual physical possession or view
- It is in one’s physical possession and has not been tampered with (i.e., it is under lock or official seal)
- It is retained in a secured area with restricted access
- It is placed in a container and secured with an official seal such that the sample cannot be reached without breaking the seal

Place custody seals on sample containers (on bubble wrap for pre-tared containers) immediately after sample collection and on shipping coolers if the cooler is to be removed from the sampler's custody.

Place custody seals in such a manner that they must be broken to open the containers or coolers. Label the custody seals with the following information:

- Sampler's name or initials
- Date and time that the sample/cooler was sealed

These seals are designed to enable detection of sample tampering. An example of a custody seal is shown in Attachment III-E-1.

Field personnel shall also log individual samples onto COC forms (carbon copy or computer generated) when a sample is collected or just prior to shipping. These forms may also serve as the request for analyses. Procedures for completing these forms are discussed in Section 5.4, indicating sample identification number, matrix, date and time of collection, number of containers, analytical methods to be performed on the sample, and preservatives added (if any). The samplers will also sign the COC form signifying that they were the personnel who collected the samples. The COC form shall accompany the samples from the field to the laboratory. When a cooler is ready for shipment to the analytical laboratory, the person delivering the samples for transport will sign and indicate the date and time on the accompanying COC form. One copy of the COC form will be retained by the sampler and the remaining copies of the COC form shall be placed inside a self-sealing bag and taped to the inside of the cooler. Each cooler must be associated with a unique COC form. Whenever a transfer of custody takes place, both parties shall sign and date the accompanying carbon copy COC forms, and the individual relinquishing the samples shall retain a copy of each form. One exception is when the samples are shipped; the delivery service personnel will not sign or receive a copy because they do not open the coolers. The laboratory shall attach copies of the completed COC forms to the reports containing the results of the analytical tests. An example COC form is provided in Attachment III-E-2.

5.3.2 Laboratory Custody Procedures

The following custody procedures are to be followed by an independent laboratory receiving samples for chemical analysis; the procedures in their Naval Facilities Engineering and Expeditionary Warfare Center-evaluated Laboratory Quality Assurance Plan must follow these same procedures. A designated sample custodian shall take custody of all samples upon their arrival at the analytical laboratory. The custodian shall inspect all sample labels and COC forms to ensure that the information is consistent, and that each is properly completed. The custodian will also measure the temperature of the temperature blank in the coolers upon arrival using either a National Institute for Standards and Technology calibrated thermometer or an infra-red temperature gun. The custodian shall note the condition of the samples including:

- If the samples show signs of damage or tampering
- If the containers are broken or leaking
- If headspace is present in sample vials
- Proper preservation of samples (made by pH measurement, except volatile organic compounds (VOCs) and purgeable total petroleum hydrocarbons (TPH) and temperature). The pH of VOC and purgeable TPH samples will be checked by the laboratory analyst after the sample aliquot has been removed from the vial for analysis.

- If any sample holding times have been exceeded

All of the above information shall be documented on a sample receipt sheet by the custodian.

Discrepancies or improper preservation shall be noted by the laboratory as an out-of-control event and shall be documented on an out-of-control form with corrective action taken. The out-of-control form shall be signed and dated by the sample control custodian and any other persons responsible for corrective action. An example of an out-of-control form is included as Attachment III-E-4.

The custodian shall then assign a unique laboratory number to each sample and distribute the samples to secured storage areas maintained at 4 degrees Celsius (soil samples for VOC analysis are to be stored in a frozen state until analysis). The unique laboratory number for each sample, the COC sample number, the client name, date and time received, analysis due date, and storage shall also be manually logged onto a sample receipt record and later entered into the laboratory's computerized data management system. The custodian shall sign the shipping bill and maintain a copy.

Laboratory personnel shall be responsible for the care and custody of samples from the time of their receipt at the laboratory through their exhaustion or disposal. Samples should be logged in and out on internal laboratory COC forms each time they are removed from storage for extraction or analysis.

5.4 COMPLETING COC/ANALYTICAL REQUEST FORMS

COC form/analytical request form completion procedures are crucial in properly transferring the custody and responsibility of samples from field personnel to the laboratory. This form is important for accurately and concisely requesting analyses for each sample; it is essentially a release order from the analysis subcontract.

Attachment III-E-2 is an example of a generic COC/analytical request form that may be used by field personnel. Multiple copies may be tailored to each project so that much of the information described below need not be handwritten each time. Attachment III-E-3 is an example of a completed site-specific COC/analytical request form, with box numbers identified and discussed in text below.

Box 1 *Project Manager:* This name shall be the name that will appear on the report. Do not write the name of the Project Coordinator or point of contact for the project instead of the CTO manager.

Project Name: Write the project name as it is to appear on the report.

Project Number: Write the project number as it is to appear on the report. It shall include the project number and task number. Also include the laboratory subcontract number.

Box 2 *Bill to:* List the name and address of the person/company to bill only if it is not in the subcontract with the laboratory.

Box 3 *Sample Disposal Instructions:* These instructions will be stated in the Master Service Agreement or each CTO statement of work with each laboratory.

Shipment Method: State the method of shipment (e.g., hand carry; air courier via FED EX, AIR BORNE, or DHL).

Comment: This area shall be used by the field team to communicate observations, potential hazards, or limitations that may have occurred in the field or additional information regarding analysis (e.g., a specific metals list, samples expected to contain high analyte concentrations).

Box 4 *Cooler Number:* This will be written on the inside or outside of the cooler and shall be included on the COC. Some laboratories attach this number to the trip blank identification, which helps track volatile organic analysis samples. If a number is not on the cooler, field personnel shall assign a number, write it on the cooler, and write it on the COC.

QC Level: Enter the reporting/QC requirements (e.g., Full Data Package, Summary Data Package).

Turn around time (TAT): TAT will be determined by a sample delivery group (SDG), which may be formed over a 14-day period, not to exceed 20 samples. Once the SDG has been completed, standard TAT is 21 calendar days from receipt of the last sample in the SDG. Entering NORMAL or STANDARD in this field will be acceptable. If quicker TAT is required, it shall be in the subcontract with the laboratory and reiterated on each COC to remind the laboratory.

Box 5 *Type of containers:* Write the type of container used (e.g., 1 liter glass amber, for a given parameter in that column).

Preservatives: Field personnel must indicate on the COC the correct preservative used for the analysis requested. Indicate the pH of the sample (if tested) in case there are buffering conditions found in the sample matrix.

Box 6 *COC sample number:* This is typically a five-character alpha-numeric identifier used by the contractor to identify samples. The use of this identifier is important since the labs are restricted to the number of characters they are able to use. See Procedure I-A-8, *Sample Naming*.

Description (sample identification): This name will be determined by the location and description of the sample, as described in Procedure I-A-8, *Sample Naming*. This sample identification should not be submitted to the laboratory, but should be left blank. If a computer COC version is used, the sample identification can be input, but printed with this block black. A cross-referenced list of COC Sample Number and sample identification must be maintained separately.

Identify if sample requires laboratory subsampling.

Date Collected: Record the collection date to track the holding time of the sample. Note: For trip blanks, record the date it was placed in company with samples.

Time Collected: When collecting samples, record the time the sample is first collected. Use of the 24-hour military clock will avoid a.m. or p.m. designations (e.g., 1815 instead of 6:15 p.m.). Record local time; the laboratory is responsible for calculating holding times to local time.

Lab Identification: This is for laboratory use only.

Box 7 *Matrix and QC:* Identify the matrix (e.g., water, soil, air, tissue, fresh water sediment, marine sediment, or product). If a sample is expected to contain high analyte concentrations (e.g., a tank bottom sludge or distinct product layer), notify the laboratory in the comment section. Mark an "X" for the sample(s) that have extra volume for laboratory QC matrix spike/matrix spike duplicate (MS/MSD) or laboratory triplicate purposes. The sample provided for MS/MSD purposes is usually a field duplicate.

Box 8 *Analytical Parameters:* Enter the parameter by descriptor and the method number desired (e.g. benzene, toluene, ethylbenzene, and xylenes 8260B, polynuclear aromatic hydrocarbons 8270C, etc.). Whenever practicable, list the parameters as they appear in the laboratory subcontract to maintain consistency and avoid confusion.

If the COC does not have a specific box for number of sample containers, use the boxes below the analytical parameter, to indicate the number of containers collected for each parameter.

Box 9 *Sampler's Signature:* The person who collected samples must sign here.

Relinquished By: The person who turned over the custody of the samples to a second party other than an express mail carrier, such as FEDEX, must sign here.

Received By: Typically, a representative of the receiving laboratory signs here. Or, a field crew member who delivered the samples in person from the field to the laboratory might sign here. A courier, such as Federal Express, does not sign here because they do not open the coolers. It must also be used by the prime contracting laboratory when samples are to be sent to a subcontractor.

Relinquished By: In the case of subcontracting, the primary laboratory will sign the Relinquished By space and fill out an additional COC to accompany the samples being subcontracted.

Received By (Laboratory): This space is for the final destination (e.g., at a subcontracted laboratory).

Box 10 *Lab Number and Questions:* This box is to be filled in by the laboratory only.

Box 11 *Control Number:* This number is the "COC" followed by the first contractor identification number in that cooler, or contained on that COC. This control number must be unique (i.e., never used twice). Record the date the COC is completed. It should be the same date the samples are collected.

Box 12 *Total No. of Containers/row:* Sum the number of containers in that row.

Box 13 *Total No. of Containers/column:* Sum the number of containers in that column. Because COC forms contain different formats depending on who produced the form, not all of the information listed in items 1 to 13 may be recorded; however, as much of this information as possible shall be included.

COC forms tailored to each CTO can be drafted and printed onto multi-ply forms. This eliminates the need to rewrite the analytical methods column headers each time. It also eliminates the need to write the project manager, name, and number; QC Level; TAT; and the same general comments each time.

Complete one COC form per cooler. Whenever possible, place all volatile organic analyte vials into one cooler in order to reduce the number of trip blanks. Complete all sections and be sure to sign and date the COC form. One copy of the COC form must remain with the field personnel.

6. Records

The COC/analytical request form shall be faxed or e-mailed to the CTO Laboratory Coordinator for verification of accuracy. Following the completion of sampling activities, the sample logbook and COC forms will be transmitted to the CTO Manager for storage in project files. The data validators shall receive a copy also. The original COC/analytical request form shall be submitted by the laboratory along with the data delivered. Any changes to the analytical requests that are required shall be made in writing to the laboratory. A copy of this written change shall be sent to the data validators and placed in the project files. The reason for the change shall be included in the project files so that recurring problems can be easily identified.

7. Health and Safety

Not applicable.

8. References

California Environmental Protection Agency (Cal/EPA). 1988. *Technical Guidance Manual, Solid Waste Water Quality Assessment Test (SWAT) Proposals and Reports.* Solid Waste Disposal Program, Hydrogeology Section, Land Disposal Branch, Division of Water Quality, State Water Resources Control Board. August.

Department of Defense, United States (DoD). 2005a. Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

———. 2005b. Uniform Federal Policy for Quality Assurance Project Plans, Part 2B: Quality Assurance/quality Control Compendium: Minimum QA/QC Activities. Final Version 1. DoD: DTIC ADA 426957, EPA-505-B-04-900B. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/swerffrr/pdf/-qaqc_v1_0305.pdf.

———. 2012. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2A: Optimized UFP-QAPP Worksheets*. Revision 1. March.

———. 2013. *Department of Defense Quality Systems Manual for Environmental Laboratories.* Version 5.0. Draft Final. Prepared by DoD Environmental Data Quality Workgroup and Department of Energy Consolidated Audit Program Operations Team. July.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

Environmental Protection Agency, United States (EPA). 1978. *NEIC Policies and Procedures.* EPA-330/9-78-001-R. Revised August 1991. National Enforcement Investigation Center. Denver. May.

———. 1988. *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA.* Interim Final. EPA/540/G-89/004. Office of Emergency and Remedial Response. October.

———. 2007. *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846.* 3rd ed., Revision 6. Office of Solid Waste. November. On-line updates at: http://www.epa.gov/epawaste/hazard/testmethods/sw846/online/index.htm.

Procedure I-A-8, *Sample Naming.*

Procedure III-D, *Logbooks.*

9. Attachments

Attachment III-E-1, Chain-of-Custody Seal

Attachment III-E-2, Generic Chain-of-Custody/Analytical Request Form

Attachment III-E-3, Sample Completed Chain-of-Custody

Attachment III-E-4, Sample Out-of-Control Form

Sample Handling, Storage, and Shipping

1. Purpose

This standard operating procedure sets forth the methods for use by the United States (U.S.) Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command (NAVFAC), Pacific personnel engaged in handling, storing, and transporting samples.

2. Scope

This procedure applies to all Navy ER projects performed in the NAVFAC Pacific Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the most recent version of the Uniform Federal Policy-Quality Assurance Project Plan (UFP QAPP) Part 1 (DoD 2005a), 2A (DoD 2012), and 2B (2005b), as well as the DoD Quality Systems Manual (DoD 2013). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved and documented by the following prime contractor representatives: the CTO Manager and the Quality Assurance (QA) Manager or Technical Director. A Navy project representative (i.e., Remedial Project Manager or QA Manager) shall also concur with any deviations.

3. Definitions

None.

4. Responsibilities

The prime contractor CTO Manager and the Laboratory Project Manager are responsible for identifying instances of non-compliance with this procedure and ensuring that future sample transport activities are in compliance with this procedure.

The Field Manager is responsible for ensuring that all samples are shipped according to this procedure.

Field personnel are responsible for the implementation of this procedure.

The QA Manager or Technical Director is responsible for ensuring that sample handling, storage, and transport activities conducted during all CTOs are in compliance with this procedure.

All field personnel are responsible for complying with Chief of Naval Operations Instruction 5090.1, under *Specific Training Requirements* (DON 2014).

5. Procedures

5.1 Handling and Storage

Immediately following collection, label all samples according to Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody*. In addition, when more than one volatile organic analyte

(VOA) vial is used to collect one sample, the chain-of-custody (COC) identification (ID) will be written on the VOA vials (even pre-tared vials) with a ball point pen for that sample. The lids of the containers shall not be sealed with duct tape, but should be covered with custody seals (except pre-tared containers which should have the custody seal placed on the outside of the protective bubble wrap). Wrap glass sample containers on the sides, tops, and bottoms with bubble wrap or other appropriate padding to prevent breakage during transport. When collecting three VOA vials per sample, it is acceptable to wrap all three vials together and store in one plastic bag. Store all glass containers for water samples in an upright position, never stacked or placed on their sides. Samples will be maintained as close to 4 degrees Celsius (°C) as possible from the time of collection through transport to the analytical laboratory, using refrigerators and/or freezers when appropriate. Place all containers into self-sealing bags and into an insulated cooler with wet ice while still in the field. Samples should occupy the lower portion of the cooler, while the ice should occupy the upper portion. Place an absorbent material (e.g., proper absorbent cloth material) on the bottom of the cooler to contain liquids in case of spillage. Ship samples as soon after collection as possible to allow the laboratory to meet holding times for analyses. Check with the laboratory for operating/sample receipt hours prior to all traditional and non-traditional holidays to ensure sample shipment will be received. When not shipping samples directly upon field collection, store samples in a refrigerator or freezer (never freeze water samples) until shipped to the laboratory.

5.2 PACKING

Each cooler must contain a temperature blank (small plastic bottle with sterile water) to confirm cooler temperature upon receipt at the laboratory. Water samples can be used as such, but it is best to include a designated temperature blank bottle, typically supplied by the laboratory with the coolers.

One trip blank must be included in each cooler containing samples for volatile analysis (e.g., volatile organic compounds, total petroleum hydrocarbons-gasoline range organics.

Cooler must be lined completely in ice at the bottom and all four sides. After confirming all project samples are accounted for and labeled correctly, place samples in cooler. Record sample IDs on cooler-specific COC(s). Pack glass containers for water samples in an upright position, never stacked or placed on their sides. Fill all empty space between sample containers with bubble wrap or other appropriate material (not Styrofoam). Place a layer of ice on top of samples and fill all empty space between ice and cooler lid with bubble wrap or other appropriate material.

Place laboratory copies of completed COC(s), and soil permit if applicable, into resealable bag and tape to underside of cooler lid.

5.3 SHIPPING

Follow all appropriate U.S. Department of Transportation regulations (e.g., 49 Code of Federal Regulations [CFR], Parts 171-179) for shipment of air, soil, water, and other samples. Elements of these procedures are summarized below.

5.3.1 Hazardous Materials Shipment

Field personnel must state whether any sample is suspected to be a hazardous material. A sample should be assumed to be hazardous unless enough evidence exists to indicate it is non-hazardous. If not suspected to be hazardous, shipments may be made as described in the Section 5.3.3 for non-hazardous materials. If hazardous, follow the procedures summarized below.

Any substance or material that is capable of posing an unreasonable risk to life, health, or property when transported is classified as hazardous. Perform hazardous materials identification by checking the list of dangerous goods for that particular mode of transportation. If not on that list, materials can be classified by checking the Hazardous Materials Table (49 CFR 172.102 including Appendix A) or by determining if the material meets the definition of any hazard class or division (49 CFR Part 173), as listed in Attachment III-F-2.

All persons shipping hazardous materials must be properly trained in the appropriate regulations, as required by HM-126F, Training for Safe Transportation of Hazardous Materials (49 CFR HM-126F Subpart H). The training covers loading, unloading, handling, storing, and transporting of hazardous materials, as well as emergency preparedness in the case of accidents. Carriers, such as commercial couriers, must also be trained. Modes of shipment include air, highway, rail, and water.

When shipping hazardous materials, including bulk chemicals or samples suspected of being hazardous, the proper shipping papers (49 CFR 172 Subpart C), package marking (49 CFR 172 Subpart D), labeling (49 CFR 172 Subpart E), placarding (49 CFR 172 Subpart F, generally for carriers), and packaging must be used. Attachment III-F-1 shows an example of proper package markings. Refer to a copy of 49 CFR each time hazardous materials/potentially hazardous samples are shipped.

According to Section 2.7 of the International Air Transport Association Dangerous Goods Regulations publication, very small quantities of certain dangerous goods may be transported without certain marking and documentation requirements as described in 49 CFR Part 172. However, other labeling and packing requirements must still be followed. Attachment III-F-2 shows the volume or weight for different classes of substances. A "Dangerous Goods in Excepted Quantities" label must be completed and attached to the associated shipping cooler (Attachment III-F-3). Certain dangerous goods are not allowed on certain airlines in any quantity.

As stated in item 4 of Attachment III-F-4, the Hazardous Materials Regulations do not apply to hydrochloric acid (HCl), nitric acid (HNO_3), sulfuric acid (H_2SO_4), and sodium hydroxide (NaOH) added to water samples if their pH or percentage by weight criteria are met. Hazardous Materials Regulations also do not apply to methanol (MeOH) for soil samples if the percentage by weight criterion is met. These samples may be shipped as non-hazardous materials as discussed below.

5.3.2 Non-hazardous Materials Shipment

If the samples are suspected to be non-hazardous based on previous site sample results, field screening results, or visual observations, if applicable, then samples may be shipped as non-hazardous.

If preservatives (HCl, HNO_3, H_2SO_4, NaOH, or MeOH) are used, ensure their individual pH or percentage by weight criteria, as shown in item 4 of Attachment III-F-4, are met to continue shipping as non-hazardous samples.

When a cooler is ready for shipment to the laboratory, place the receiving laboratory address on the top of the cooler, place chain-of-custody seals on the coolers as discussed in Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody*, place soil permit labels on top if applicable, and seal the cooler with waterproof tape.

5.3.3 Shipments from Outside the Continental United States

Shipment of sample coolers to the continental U.S. from locations outside the continental U.S. is controlled by the U.S. Department of Agriculture (USDA) and is subject to their inspection and regulation. A "USDA Soil Import Permit" is required to prove that the receiving analytical laboratory is certified by the USDA to receive and properly dispose of soil. In addition, all sample coolers must be inspected by a USDA representative, affixed with a label indicating that the coolers contain environmental samples, and accompanied by shipping forms stamped by the USDA inspector prior to shipment. In addition, the U.S. Customs Service must clear samples shipped from U.S. territorial possessions or foreign countries upon entry into the U.S. As long as the commercial invoice is properly completed (see below), shipments typically pass through U.S. Customs Service without the need to open coolers for inspection.

In Hawaii, soil sample shipments are typically brought to the courier at the airport where the courier contacts a USDA representative to make an inspection. Alternatively, the contractor may enter into an agreement with the USDA to ship soil samples. In this way, the USDA does not need to inspect each soil sample shipment. If the contractor maintains a Domestic Soil Permit, place the permit label and the soil origination label (Attachment III-F-9) on the top of the cooler. Place a copy of the receiving laboratory's soil permit with the COC inside the cooler. Confirm custody seals were placed on each container (Section 5.1) to ensure proper chain-of-custody control in the event coolers are opened for inspection.

In Guam, shipments can be dropped off directly to the Federal Express branch or to the courier at the airport. Alternatively, the courier can pick up shipments at each site provided that arrangements have been made regarding pickup time and location. USDA inspections occur outside of Guam. The laboratory's soil permit shall be placed with the COC inside the cooler, and the soil origination label (see Attachment III-F-9) should be placed on top of the cooler.

The USDA does not need to inspect water sample shipments.

Completion and use of proper paperwork will, in most cases, minimize or eliminate the need for the USDA and U.S. Customs Service to inspect the contents. Attachment III-F-5 shows an example of how paperwork may be placed on the outside of coolers for non-hazardous materials. For hazardous materials, refer to Section 5.3.1.

In summary, tape the paperwork listed below to the outside of the coolers to assist sample shipments. If a shipment is made up of multiple pieces (e.g., more than one cooler), the paperwork need only be attached to one cooler, provided that the courier agrees. All other coolers in the shipment need only be taped and have address and COC seals affixed.

1. **Courier Shipping Form & Commercial Invoice**. See Attachment III-F-6, and Attachment III-F-7 for examples of the information to be included on the commercial invoice for soil and water. Place the courier shipping form and commercial invoice inside a clear, plastic, adhesive-backed pouch that adheres to the package (typically supplied by the courier) and place it on the cooler lid as shown in Attachment III-F-5.
2. **Soil Import Permit (soil only)**. See Attachment III-F-8 and Attachment III-F-9 for examples of the soil import permit and soil samples restricted entry labels. The laboratory shall supply these documents prior to mobilization. The USDA in Hawaii often <u>does</u> stop

shipments of soil without these documents. Staple together the 2 inch × 2 inch USDA label (described below), and soil import permit, and place them inside a clear plastic pouch. The courier typically supplies the clear, plastic, adhesive-backed pouches that adhere to the package.

Placing one restricted entry label as shown in Attachment III-F-5 (covered with clear packing tape) and one stapled to the actual permit is suggested.

The USDA does not control water samples, so the requirements for soil listed above do not apply.

3. **Chain-of-Custody Seals**. The laboratory should supply the seals. CTO personnel must sign and date these. At least two seals should be placed in such a manner that they stick to both the cooler lid and body. Placing the seals over the tape (as shown in Attachment III-F-5), then covering it with clear packing tape is suggested. This prevents the seal from coming loose and enables detection of tampering.
4. **Address Label**. Affix a label stating the destination (laboratory address) of each cooler.
5. **Special Requirements for Hazardous Materials**. See Section 5.3.1.

Upon receipt of sample coolers at the laboratory, the sample custodian shall inspect the sample containers as discussed in Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody*. The samples shall then be either immediately extracted and/or analyzed, or stored in a refrigerated storage area until they are removed for extraction and/or analysis. Whenever the samples are not being extracted or analyzed, they shall be returned to refrigerated storage.

6. Records

Maintain records as required by implementing these procedures.

7. Health and Safety

Personnel shall perform work in accordance with the current (or as contractually obligated) United States Army Corps of Engineers Safety and Health Requirements Manual EM-385-1-1 (USACE 2012) and site-specific health and safety plan.

8. References

Department of Defense, United States (DoD). 2005a. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/fedfac/pdf/ufp_qapp_v1_0305.pdf.

———. 2005b. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2B: Quality Assurance/quality Control Compendium: Minimum QA/QC Activities*. Final Version 1. DoD: DTIC ADA 426957, EPA-505-B-04-900B. In conjunction with the U. S. Environmental Protection Agency and the Department of Energy. Washington: Intergovernmental Data Quality Task Force. March. On-line updates available at: http://www.epa.gov/swerffrr/pdf/-qaqc_v1_0305.pdf.

———. 2012. *Uniform Federal Policy for Quality Assurance Project Plans, Part 2A: Optimized UFP-QAPP Worksheets*. Revision 1. March.

———. 2013. *Department of Defense Quality Systems Manual for Environmental Laboratories.* Version 5.0. Draft Final. Prepared by DoD Environmental Data Quality Workgroup and Department of Energy Consolidated Audit Program Operations Team. July.

Department of the Navy (DON). 2014. *Environmental Readiness Program Manual*. OPNAV Instruction 5090.1D. 10 January.

United States Army Corps of Engineers (USACE). 2008. *Consolidated Safety and Health Requirements Manual.* EM-385-1-1. Includes Changes 1–7. 13 July 2012.

Procedure III-E, *Record Keeping, Sample Labeling, and Chain-of-Custody.*

9. Attachments

Attachment III-F-1: Example Hazardous Materials Package Marking

Attachment III-F-2: Packing Groups

Attachment III-F-3: Label for Dangerous Goods in Excepted Quantities

Attachment III-F-4: SW-846 Preservative Exception

Attachment III-F-5: Non-Hazardous Material Cooler Marking Figure for Shipment From Outside The Continental United States

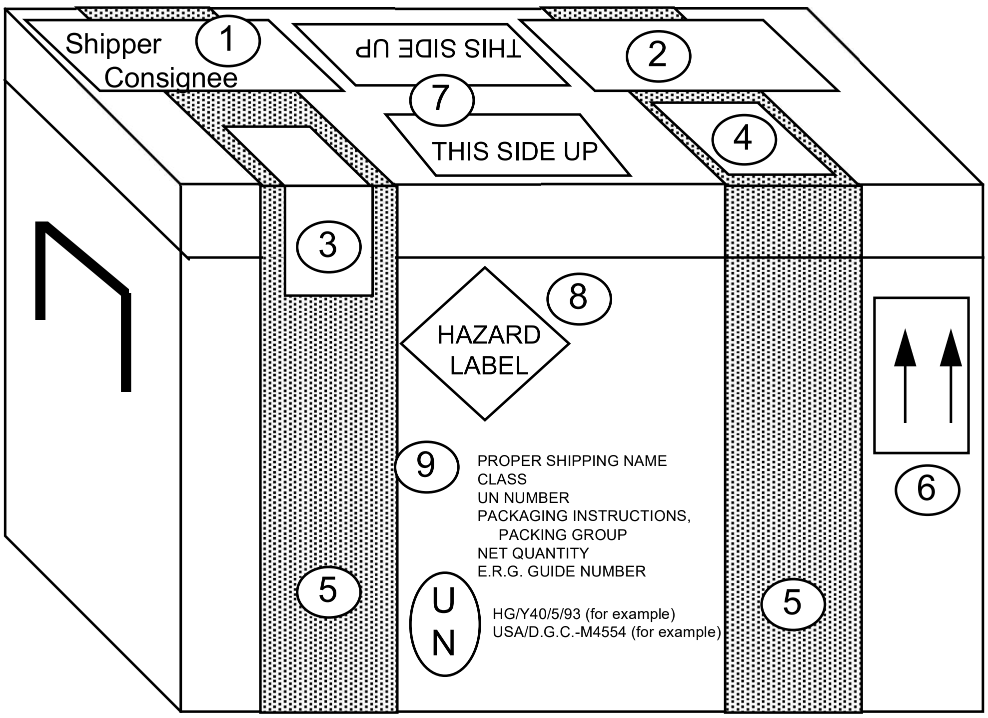
Attachment III-F-6: Commercial Invoice – Soil

Attachment III-F-7: Commercial Invoice – Water

Attachment III-F-8: Soil Import Permit

Attachment III-F-9: Soil Samples Restricted Entry Labels

Attachment III-F-1
Example Hazardous Material Package Marking



1 **AIR BILL/COMMERCIAL INVOICE**

2 **USDA PERMIT (Letter to Laboratory from USDA)**

3 **CUSTODY SEAL**

4 **USDA 2" X 2" SOIL IMPORT PERMIT**

5 **WATERPROOF STRAPPING TAPE**

6 **DIRECTION ARROWS STICKER - TWO REQUIRED**

7 **THIS SIDE UP STICKERS**

8 **HAZARD LABEL**

9 **HAZARDOUS MATERIAL INFORMATION**

10 **PACKAGE SPECIFICATIONS**

Attachment III-F-2
Packing Groups

PACKING GROUP OF THE SUBSTANCE	PACKING GROUP 1		PACKING GROUP II		PACKING GROUP III	
CLASS or DIVISION of PRIMARY or SUBSIDIARY RISK	Packagings		Packagings		Packagings	
	Inner	Outer	Inner	Outer	Inner	Outer
1: Explosives	---------------------------- Forbidden (Note A) ----------------------------------					
2.1: Flammable Gas	---------------------------- Forbidden (Note B) ----------------------------------					
2.2: Non-Flammable, non-toxic gas	---------------------------- See Notes A and B ----------------------------------					
2.3: Toxic gas	---------------------------- Forbidden (Note A) ----------------------------------					
3. Flammable liquid	30 mL	300 mL	30 mL	500 mL	30 mL	1 L
4.1 Self-reactive substances	Forbidden		Forbidden		Forbidden	
4.1: Other flammable solids	Forbidden		30 g	500 g	30 g	1 kg
4.2: Pyrophoric substances	Forbidden		Not Applicable		Not Applicable	
4.2 Spontaneously combustible substances	Not Applicable		30 g	500 g	30 g	1 kg
4.3: Water reactive substances	Forbidden		30 g or 30 mL	500 g or 500 mL	30 g or 30 mL	1 kg or 1 L
5.1: Oxidizers	Forbidden		30 g or 30 mL	500 g or 500 mL	30 g or 30 mL	1 kg or 1 L
5.2: Organic peroxides (Note C)	See Note A		30 g or 30 mL	500 g or 250 mL	Not Applicable	
6.1: Poisons - Inhalation toxicity	Forbidden		1 g or 1 mL	500 g or 500 mL	30 g or 30 mL	1 kg or 1 L
6.1: Poisons - oral toxicity	1 g or 1 mL	300 g or 300 mL	1 g or 1 mL	500 g or 500 mL	30 g or 30 mL	1 kg or 1 L
6.1: Poisons - dermal toxicity	1 g or 1 mL	300 g or 300 mL	1 g or 1 mL	500 g or 500 mL	30 g or 30 mL	1 kg or 1 L
6.2: Infectious substances	---------------------------- Forbidden (Note A) ----------------------------------					
7: Radioactive material (Note D)	---------------------------- Forbidden (Note A) ----------------------------------					
8: Corrosive materials	Forbidden		30 g or 30 mL	500 g or 500 mL	30 g or 30 mL	1 kg or 1 L
9: Magnetized materials	---------------------------- Forbidden (Note A) ----------------------------------					
9: Other miscellaneous materials (Note E)	Forbidden		30 g or 30 mL	500 g or 500 mL	30 g or 30 mL	1 kg or 1 L

Note A: *Packing groups are not used for this class or division.*
Note B: *For inner packagings, the quantity contained in receptacle with a water capacity of 30 mL. For outer packagings, the sum of the water capacities of all the inner packagings contained must not exceed 1 L.*
Note C: *Applies only to Organic Peroxides when contained in a chemical kit, first aid kit or polyester resin kit.*
Note D: *See 6.1.4.1, 6.1.4.2 and 6.2.1.1 through 6.2.1.7, radioactive material in excepted packages.*
Note E: *For substances in Class 9 for which no packing group is indicated in the List of Dangerous Goods, Packing Group II quantities must be used.*

Attachment III-F-3
Label for Dangerous Goods in Excepted Quantities

DANGEROUS GOODS IN EXCEPTED QUANTITIES

This package contains dangerous goods in excepted small quantities and is in all respects in compliance with the applicable international and national government regulations and the IATA Dangerous Goods Regulations.

____
Signature of Shipper

____________________ ____________________
Title Date

____

____
Name and address of Shipper

This package contains substance(s) in Class(es) (check applicable box(es))

Class:	2	3	4	5	6	8	9
	o	o	o	o	o	o	o

and the applicable UN Numbers are:

Attachment III-F-4
SW-846 Preservative Exception

Measurement	Vol. Req. (mL)	Container[2]	Preservative [3,4]	Holding Time[5]
MBAS	250	P,G	Cool, 4ºC	48 Hours
NTA	50	P,G	Cool, 4ºC	24 Hours

1. More specific instructions for preservation and sampling are found with each procedure as detailed in this manual. A general discussion on sampling water and industrial wastewater may be found in ASTM, Part 31, p. 72-82 (1976) Method D-3370.

2. Plastic (P) or Glass (G). For metals, polyethylene with a polypropylene cap (no liner) is preferred.

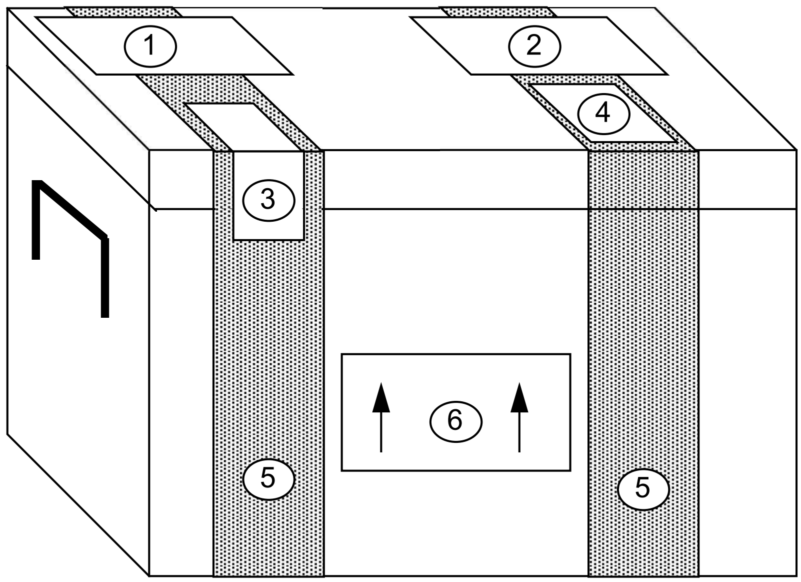
3. Sample preservation should be performed immediately upon sample collection. For composite samples each aliquot should be preserved at the time of collection. When use of an automated sampler makes it impossible to preserve each aliquot, then samples may be preserved by maintaining at 4ºC until compositing and sample splitting is completed.

4. When any sample is to be shipped by common carrier or sent through the United States Mail, it must comply with the Department of Transportation Hazardous Materials Regulations (49 CFR Part 172). The person offering such material for transportation is responsible for ensuring such compliance. for the preservation requirements of Table 1, the Office of Hazardous Materials, Materials Transportation Bureau, Department of Transportation has determined that the Hazardous Materials regulations do not apply to the following materials: Hydrochloric acid (HCl) in water solutions at concentration of 0.04% by weight or less (pH about 1.96 or greater); Nitric acid (HNO_3) in water solutions at concentrations of 0.15% by weight or less (pH about 1.62 or greater); Sulfuric acid (H_2SO_4) in water solutions at concentrations of 0.35% by weight or less (pH about 1.15 or greater); Sodium hydroxide (NaOH) in water solutions at concentrations of 0.080% by weight or less (pH about 12.30 or less).

5. Samples should be analyzed as soon as possible after collection. The times listed are the maximum times that samples may be held before analysis and still considered valid. Samples may be held for longer periods only if the permittee, or monitoring laboratory, has data on file to show that the specific types of sample under study are stable for the longer time, and has received a variance from the Regional Administrator. Some samples may not be stable for the maximum time period given in the table. A permittee, or monitoring laboratory, is obligated to hold the sample for a shorter time if knowledge exists to show this is necessary to maintain sample stability.

6. Should only be used in the presence of residual chlorine.

Attachment III-F-5
Non-Hazardous Material Cooler Marking Figure for Shipment from outside the Continental United States



1 AIR BILL/COMMERCIAL INVOICE

2 USDA PERMIT (Letter to Laboratory from USDA)

3 CUSTODY SEAL

4 USDA 2" X 2" SOIL IMPORT PERMIT

5 WATERPROOF STRAPPING TAPE

6 DIRECTION ARROWS STICKER - TWO REQUIRED

Attachment III-F-6
Commercial Invoice – Soil

DATE OF EXPORTATION 1/1/94	EXPORT REFERENCES (i.e., order no., invoice no., etc.) <CTO #>
SHIPPER/EXPORTER (complete name and address) Joe Smith Ogden c/o <hotel name> <hotel address>	CONSIGNEE Sample Receipt <Lab Name> <Lab Address>
COUNTRY OF EXPORT Guam, USA	IMPORTER - IF OTHER THAN CONSIGNEE
COUNTRY OF ORIGIN OF GOODS Guam, USA	
COUNTRY OF ULTIMATE DESTINATION USA	

INTERNATIONAL
AIR WAYBILL NO.

(NOTE: All shipments must be accompanied by a Federal Express International Air Waybill)

MARKS/NOS	NO. OF PKGS	TYPE OF PACKAGING	FULL DESCRIPTION OF GOODS	QTY	UNIT OF MEASURE	WEIGHT	UNIT VALUE	TOTAL VALUE
	3	coolers	Soil samples for labora analysis only				$1.00	$3.00
	TOTAL NO. OF PKGS.					TOTAL WEIGHT		TOTAL INVOICE VALUE
	3							$3.00

Check one
☐ F.O.B.
☐ C&F
☐ C.I.F.

THESE COMMODITIES ARE LICENSED FOR THE ULTIMATE DESTINATION SHOWN.

DIVERSION CONTRARY TO UNITED STATES LAW IS PROHIBITED.

I DECLARE ALL THE INFORMATION CONTAINED IN THIS INVOICE TO BE TRUE AND CORRECT

SIGNATURE OF SHIPPER/EXPORTER (Type name and title and sign)

Joe Smith, Ogden	Joe Smith	1/1/94
Name/Title	Signature	Date

Attachment III-F-7
Commercial Invoice – Water

DATE OF EXPORTATION 1/1/94	EXPORT REFERENCES (i.e., order no., invoice no., etc.) <CTO #>
SHIPPER/EXPORTER (complete name and address) Joe Smith Ogden c/o <hotel name> <hotel address>	CONSIGNEE Sample Rece <Lab Name> <Lab Address>
COUNTRY OF EXPORT Guam, USA	IMPORTER - IF OTHER THAN CONSIGNEE
COUNTRY OF ORIGIN OF GOODS Guam, USA	
COUNTRY OF ULTIMATE DESTINATION USA	

INTERNATIONAL AIR WAYBILL NO.

(NOTE: All shipments must be accompanied by a Federal Express International Air Waybill)

MARKS/NOS	NO. OF PKGS	TYPE OF PACKAGING	FULL DESCRIPTION OF GOODS	QTY	UNIT OF MEASURE	WEIGHT	UNIT VALUE	TOTAL VALUE
	3	coolers	Water samples for labo analysis only				$1.00	$3.00
	TOTAL NO. OF PKGS.					TOTAL WEIGHT		TOTAL INVOICE VALUE
	3							$3.00

Check one
☐ F.O.B.
☐ C&F
☐ C.I.F.

THESE COMMODITIES ARE LICENSED FOR THE ULTIMATE DESTINATION SHOWN.

DIVERSION CONTRARY TO UNITED STATES LAW IS PROHIBITED.

I DECLARE ALL THE INFORMATION CONTAINED IN THIS INVOICE TO BE TRUE AND CORRECT

SIGNATURE OF SHIPPER/EXPORTER (Type name and title and sign)

Name/Title	Signature	Date
Joe Smith, Ogden	Joe Smith	1/1/94

Attachment III-F-8
Soil Import Permit

UNITED STATES DEPARTMENT OF AGRICULTURE

Animal and Plant Health Inspection Service

Plant Protection and Quarantine

Soil Permit

Permit Number: S-52299

Issued To: Columbia Analytical Services
(Lee Wolf)
1317 S. 13th Avenue
Kelso, Washington 98626

TELEPHONE: (360) 577-7222

Under the authority of the Federal Plant Pest Act of May 23, 1957, permission is hereby granted to the facility/individual named above subject to the following conditions:

1. Valid for shipments of soil not heat treated at the port of entry, only if a compliance agreement (PPQ Form 519) has been completed and signed. Compliance Agreements and Soil permits are non-transferable. If you hold a Soil Permit and you leave your present employer or company, you must notify your local USDA office promptly.
2. To be shipped in sturdy, leakproof, containers.
3. To be released without treatment at the port of entry.
4. To be used only for analysis and only in the facility of the permittee at Columbia Analytical Services, located in Kelso, Washington.
5. No use of soil for growing purposes is authorized, including the isolation or culture of organisms imported in soil.
6. All unconsumed soil, containers, and effluent is to be autoclaved, incinerated, or heat treated by the permittee at the conclusion of the project as approved and prescribed by Plant Protection and Quarantine.
7. This permit authorizes shipments from all foreign sources, including Guam, Hawaii, Puerto Rico, and the U.S. Virgin Islands through any U.S [redacted] (b) (6)

JUNE 30, 2006
Expiration Date

Approving Official DEBORAH M. KNOTT

WARNING: Any alteration, forgery, or unauthorized use of this Federal form is subject to civil penalties of up to $250,000 (7 U.S.C. s 7734(b)) or punishable by a fine of not more than $10,000, or imprisonment of not more than 5 years, or both (18 U.S.C. s 1001).

PPQ FORM 525B (8/94)

Pt. 1 - PERMITTEE

Attachment III-F-9
Soil Samples Restricted Entry Label and Soil Origin Label

U.S. DEPARTMENT OF AGRICULTURE

ANIMAL AND PLANT HEALTH INSPECTION SERVICE

PLANT PROTECTION AND QUARANTINE

HYATTSVILLE, MARYLAND 20782

SOIL SAMPLES

RESTRICTED ENTRY

The material contained in this package is imported under authority of the Federal Plant Pest Act of May 23, 1957.

For release without treatment if addressee is currently listed as approved by Plant Protection and Quarantine.

PPQ FORM 550 *Edition of 12/77 may be used*

(JAN 83)

Soil Samples Restricted Entry Label

SOIL ENCLOSED

Origin of Soil ___________________________

Soil Origin Label

Appendix C: References

REFERENCES

Department of Defense and Department of Energy, United States (DoD and DOE). 2019. *Department of Defense (DoD) and Department of Energy (DOE) Consolidated Quality Systems Manual (QSM) for Environmental Laboratories*. DoD QSM Ver. 5.3. Prepared by DoD Environmental Data Quality Workgroup and DOE Consolidated Audit Program Operations Team.

Department of Defense, United States (DoD). 2005. *Uniform Federal Policy for Quality Assurance Project Plans, Part 1: UFP-QAPP Manual*. Final Version 1. DoD: DTIC ADA 427785, EPA-505-B-04-900A. In conjunction with the U.S. Environmental Protection Agency and the Department of Energy. Washington, DC: Intergovernmental Data Quality Task Force. March.

Department of Health, State of Hawaii (DOH). 2017a. *Evaluation of Environmental Hazards at Sites with Contaminated Soil and Groundwater, Hawai'i Edition*. Hazard Evaluation and Emergency Response. Revised 2017. Fall.

———. 2017b. *Technical Guidance Manual for the Implementation of the Hawaii State Contingency Plan*. Interim Final. Honolulu, HI: Hazard Evaluation and Emergency Response Office. September.

Department of the Navy (DON). 1997a. *UST Removal Closure Report, VC-3 Project, Two 5000 GAL USTs at Pearl Harbor, Hawaii, CNR of Arizona St. and Neosho Ave. Repair Valve Chamber 3 and POL Pipeline Modification*. WEECO Environmental Subcontractor. Complete Plant Maintenance, Inc. and Healy Tibbitts Builders, Inc. General Contractor.

———. 1997b. *Remedial Investigation/Feasibility Study for Subsurface Fuel Investigation, Naval Base (NAVBASE) Pearl Harbor, Hawaii*. Prepared by Ogden Environmental and Energy Services Company, Inc. Pearl Harbor, HI: Naval Facilities Engineering Command, Pacific. October.

———. 1997c. *Remedial Investigation/Feasibility Study, Subsurface Fuel Investigation, Naval Base (NAVBASE) Pearl Harbor, Pearl Harbor, Hawaii, Volume I: Technical Report - Part I*. Prepared by Ogden Environmental and Energy Services Company, Inc. Pearl Harbor, HI: Naval Facilities Engineering Command, Pacific. October.

———. 1999. *Engineering Evaluation/Cost Analysis, Removal Action at the Hotel Pier Site, Fleet and Industrial Supply Center, Pearl Harbor Naval Complex, Oahu, Hawaii*. Prepared by Earth Tech, Inc. and Tetra Tech EM Inc. Pearl Harbor, HI: Naval Facilities Engineering Command, Pacific. November.

———. 2003. *Site Summary Report, Halawa-Main Gate Geographic Study Area, Pearl Harbor Naval Complex, Oahu, Hawaii*. Prepared by Earth Tech, Inc. Pearl Harbor, HI: Naval Facilities Engineering Command, Pacific. March.

———. 2006. *Navy Guidance for Conducting Ecological Risk Assessments*. Navy Environmental Health Center. Website last updated January 23.

———. 2007. *Classification of Shallow Caprock Groundwater at Navy Oahu Facilities, Oahu, Hawaii*. Prepared by Earth Tech, Inc. Pearl Harbor, HI: Naval Facilities Engineering Command, Hawaii. June.

———. 2008. *U.S. Navy Human Health Risk Assessment Guidance*. Prepared for Naval Facilities Engineering Command and Navy and Marine Corps Public Health Center by Pioneer Technologies Corporation. December.

———. 2009. *Environmental Hazard Evaluation/Management Plans for Subsurface Fuel Remedial Action Areas (RAA-1 through RAA-10), Halawa-Main Gate Geographic Study Area, Pearl Harbor, Oahu, Hawaii*. Prepared by AECOM Technical Services, Inc. Pearl Harbor, HI: Naval Facilities Engineering Command, Pacific. May.

———. 2011. *Naval Facilities Engineering Command (NAVFAC) Tiered Approach for Developing Sampling and Analysis Plans*. Letter from: B. P. Harrison, Commander, Naval Facilities Engineering Command, to: NAVFAC areas of responsibility (AORs). 5090; Ser 11007/EV3KPB. June 3. Enclosure 1: Naval Facilities Engineering Command – Sampling and Analysis Plans Update, March 7, 2011; update to NAVFAC Atlantic and NAVFAC Pacific AORs.

———. 2012. *Draft Revision 2, Environmental Hazard Evaluation/Management Plans for Subsurface Fuel Remedial Action Areas (RAA-1 through RAA-10), Halawa-Main Gate Geographic Study Area, Joint Base Pearl Harbor-Hickam, Oahu, Hawaii*. Prepared by AECOM Technical Services, Inc. JBPHH HI: Naval Facilities Engineering Command, Pacific. June.

———. 2015. *Final Project Procedures Manual, U.S. Navy Environmental Restoration Program, NAVFAC Pacific*. JBPHH HI: Naval Facilities Engineering Command, Pacific. May.

———. 2017. *Forty-Fourth Report (1 October 2016 – 30 September 2017) Annual Performance Monitoring Report Product Recovery System Remedial Action Area 1 (RAA-1) (Hotel Pier Site) NAVSUP Fleet Logistics Center, Joint Base Pearl Harbor-Hickam, Oahu, Hawaii*. Element Environmental LLC. Naval Facilities Engineering Command, Hawaii.

Environmental Protection Agency, United States (EPA). 1989. *Risk Assessment Guidance for Superfund, Volume I: Human Health Evaluation Manual (Part A)*. Interim Final. EPA/540/1-89/002. Office of Emergency and Remedial Response. December.

———. 1998. *Guidelines for Ecological Risk Assessment*. EPA/630/R-95-002F. Risk Assessment Forum. May.

———. 2003. *Guidance for Obtaining Representative Laboratory Analytical Subsamples from Particulate Laboratory Samples*. EPA-600-R-03-027. Office of Research and Development. November.

———. 2006. *Guidance on Systematic Planning Using the Data Quality Objectives Process*. EPA QA/G-4. EPA/240/B-06/001. Washington, DC: Office of Environmental Information. February.

Nakai, Glynnis. 1997. *Pers. Comm. with Acting Refuge Manager, Oahu Refuges United States Fish and Wildlife Service (USFWS)*. August 13.

Naval Command, Control and Ocean Surveillance Center (NCCOSC). 1979. *Marine Environmental Assessment at Three Sites in Pearl Harbor, Oahu: August–October*.