

TITLE AND APPROVAL PAGE

**SITE INSPECTION FIELD SAMPLING PLAN
EAST AVENUE STUDY AREA
CITY OF ERIE, ERIE COUNTY, PENNSYLVANIA**

REVISION 0

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Superfund and Emergency Management Division
Region 3
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2029**



CONTRACT NO.	68HE0320D0003	
TECHNICAL DIRECTION NO.	T603-24-06-001	
EPA SITE ASSESSMENT MANAGER	Lorie Baker	
SITE NAME	East Avenue Study Area	
SITE LOCATION	City of Erie, Erie County, Pennsylvania	
SAMPLING ACTIVITIES	Soil sampling	
SAMPLING DATES	To be determined	
FSP PREPARER	Not responsive due to revised scope	
SIGNATURE/DATE	Not responsive due to revised scope	06/12/2024
QUALITY ASSURANCE OFFICER	Not responsive due to revised scope	
SIGNATURE/DATE	Not responsive due to revised scope	06/11/2024
EPA SAM APPROVAL SIGNATURE/DATE	LORIE BAKER Digitally signed by LORIE BAKER Date: 2024.06.12 15:25:29 -04'00'	
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DOCUMENT TRACKING NO.	0923 RV0	

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ATTACHMENTS

- Attachment 1 – Toxic Release Inventory.
- Attachment 2 – Environmental Justice Screening.
- Attachment 3 – EPA. 2023. Field X-Ray Fluorescence Measurement. LSASDPROC-107-R6. April 22.
- Attachment 4 - Hawaii Department of Health (HDOH). 2023. Technical Guidance Manual, Sections 3 and 4 **Site Investigation Design and Implementation: State of Hawaii, Department of Health, Office of Hazard Evaluation and Emergency Response.**

ACRONYMS

µm	micrometer
APPL	Agriculture and Priority Pollutants Laboratories, LLC
bgs	Below ground surface
BY	Backyard
CAA	Clean Air Act
CAP	Criteria air pollutants
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CLP	Contract Laboratory Program
CO	Carbon monoxide
CO ₂	Carbon dioxide
COC	Chain of Custody
CRQL	Contract Required Quantitation Limit
CST	Client Services Team
D	Duplicate
DAS	Delivery of Analytical Services
DQO	Data quality objectives
DU	Decision Unit
DUP	Duplicate
EA	East Avenue
ECHO	Environmental Compliance History Online
EDR	Environmental Data Resources, Inc.
EJ	Environmental Justice
EPA	Environmental Protection Agency
ESAT	Environmental Services Assistance Team
EW	Erie Water Works
EY	Entire yard
FSP	Field Sampling Plan
FY	Front Yard
GE	General Electric
GHG	Greenhouse Gases
GPS	Global Positioning System
HAP	Hazardous air pollutant
HDOH	Hawaii Department of Health
HPLC	High Performance Liquid Chromatography
IDW	Investigation-derived waste
LLC	Limited Liability Company
LTSB	Laboratory and Technical Services Branch
MI	Multi-incremental
MS	Matrix Spike
MSD	Matrix Spike Duplicate
MSOP	Major Source Operating Permit

MTCO _{2e}	Metric Tons of CO ₂ Emitted
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Protection Act
NO _x	Nitrogen dioxide
NRCS	National Resources Conservation Service
oz.	Ounce
PADEP	Pennsylvania Department of Environmental Protection
PAH	Polycyclic aromatic hydrocarbons
PBT	Persistent Bioaccumulative Toxic
PCE	Tetrachloroethylene
PM ₁₀	Inhalable particles with particulate matter having diameters less than or equal to 10 micrometers
PM _{2.5}	Fine inhalable particles with particulate matter having diameters less than or equal to 2.5 micrometers
PVC	Polyvinyl chloride
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
R4	EPA Region 4
RAS	Routine Analytical Services
RSL	Risk Screen Level
SEMS	Superfund Environmental Management System
SO ₂	Sulfur dioxide
SOP	Standard Operating Procedure
SSL	Soil Screening Level
START	Superfund Technical Assistance and Response Team
SVOC	Semi-volatile organic compound
TAL	Target Analyte List
TAT	Turn-around-time
TD	Task Directive
THQ	Target hazard quotient
TR	Traffic Report
TRI	Toxic Release Inventory
TSP	Total suspended particulates
UFP	Uniform Federal Policy
USDA	United States Department of Agriculture
XRF	X-ray fluorescence

1.0 INTRODUCTION

Under Superfund Technical Assessment and Response Team (START) Contract No. 68HE0320D0003, Technical Direction (TD) No. T603-24-06-001, the U.S. Environmental Protection Agency (EPA) Region 3 tasked Tetra Tech, Inc. (Tetra Tech) to perform a Site Inspection (SI) at the East Avenue Study Area Site (Study Area) (EPA ID Number PAN000320096) in the City of Erie, Erie County, Pennsylvania. Specifically, EPA tasked Tetra Tech with collecting soil samples from the Study Area to determine whether air emissions from Erie Coke Plant have deposited onto soil in the Study Area through wind transport.

The purpose of this investigation is to gather additional information to support a site decision regarding the need for further action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). In accordance with the *Guidance for Performing Site Inspections Under the Comprehensive Environmental Response, Compensation, and Liability Act* (Ref. 1), this Field Sampling Plan (FSP) specifies procedures for collecting samples, sample matrices, analytical parameters and methods, and quality control (QC) requirements intended to meet analytical data requirements. Tetra Tech developed the FSP in accordance with the provisions of the EPA, Region 3, START VI Program Uniform Federal Policy Quality Assurance Project Plan (QAPP) (Ref. 2). The QAPP lists key personnel and provides an organizational chart, a QAPP distribution list, and a communication list.

This FSP presents objectives in Section 2.0; site location and history in Section 3.0; source characteristics in Section 4.0; an environmental justice (EJ) screen in Section 5.0; the soil exposure in Section 6.0; field procedures, sample locations, and rationale in Section 7.0; analytical parameters in Section 8.0; chain-of-custody procedures in Section 9.0; measurement of data quality objectives in Section 10; and the data reporting and proposed schedule in Section 11.0. References cited in this FSP are listed in Section 12.0.

2.0 OBJECTIVES

On October 16, 2023, January 29, 2024, April 15, 2024, and April 29, 2024, EPA and Tetra Tech held a planning and scoping meeting to discuss the project and determine the data quality objectives in accordance with the QAPP (Ref. 2). The objective of the investigation is to determine whether air emissions from the Erie Coke Plant have deposited hazardous substances onto soil in the Study Area, and if so, are any hazardous substances at concentrations that pose a threat to human health and the environment. The Study Area includes a residential area where releases of hazardous substances to air from active and inactive industrial facilities in the Erie area may have deposited onto soil within the study area. Migration of contaminants from the Erie Coke Plant is the focus of the investigation. There are also other possible sources of air emissions in the area that need to be considered when determining the source of any

contamination found in the Study Area. The boundaries of the Study Area are not precisely defined at this point of the investigation and may change after the soil analytical data is obtained and reviewed.

This FSP outlines procedures for collecting analytical data to evaluate the potential presence of soil contamination in the Study Area. The objectives of this sampling event are the following:

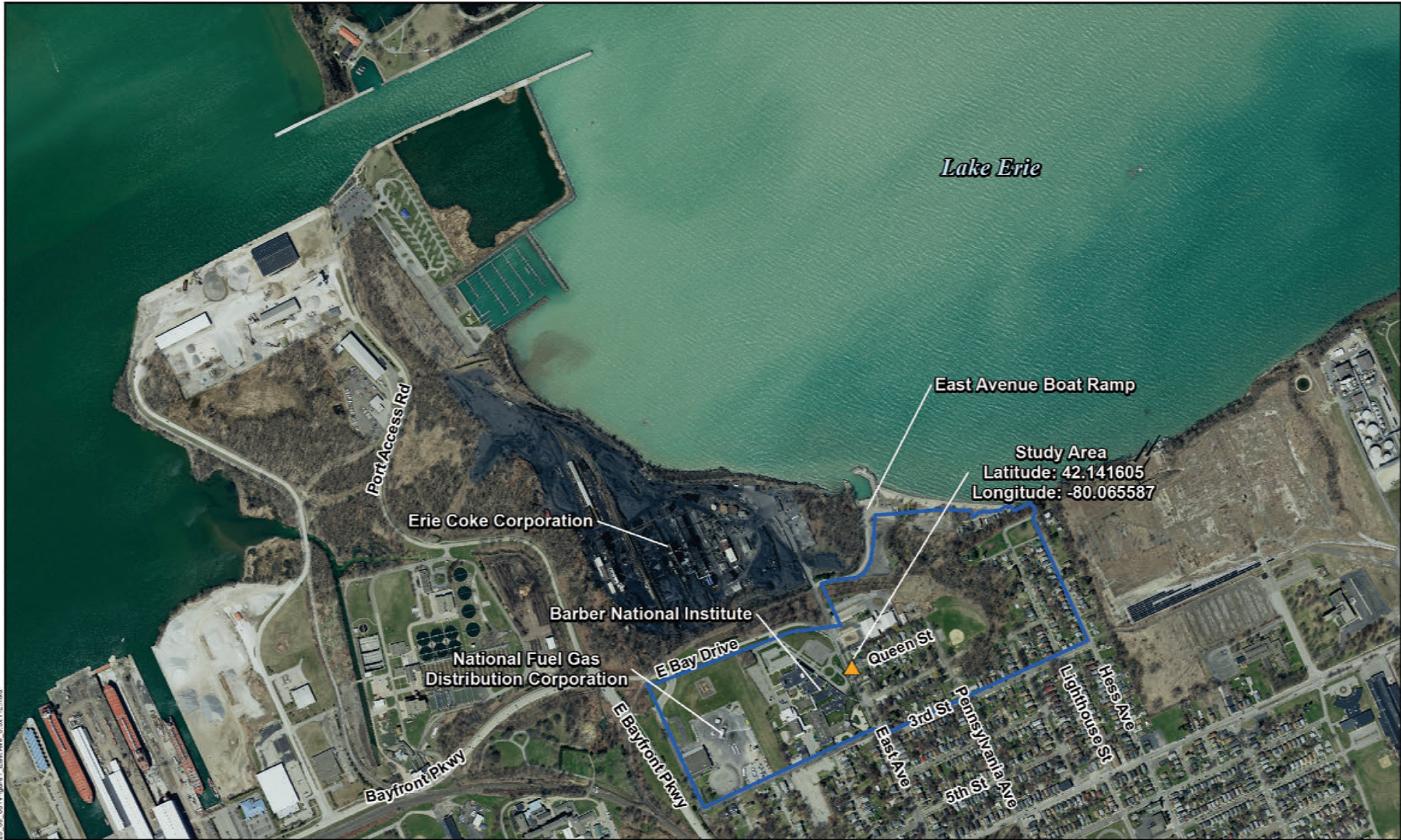
- To provide a current, temporal data set (collected during the same event) of inorganic and organic compound concentrations in background and Study Area soil samples.
- To collect and analyze surface soil samples from properties in the Study Area and background locations using Incremental Sampling Methodology (ISM) to identify possible areas of soil contamination within the study area and document background soil concentrations.
- To collect one or more grab surface soil samples from each property sampled in the Study Area to be used to complete a soil risk toxicological evaluation. The grab surface soil sample(s) will be collected from a location(s) with highest X-ray fluorescence (XRF) screening for lead.
- To compare the analytical data to benchmark concentrations and determine whether any concentrations of contaminants in sampled media present a threat to human health and environment.
- To evaluate the data and information to make decisions regarding future actions.



3.0 BACKGROUND

This section describes the site location and layout and summarizes the site history.

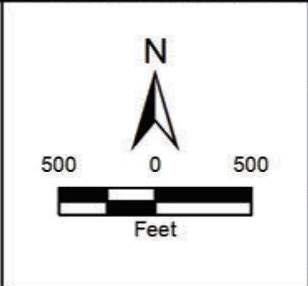
3.1 SITE LOCATION AND LAYOUT

The approximate center of the Study Area is the intersection of East Avenue and Queen Streets in City of Erie, Erie County, Pennsylvania with a longitude of 42.141605 and latitude of -80.065587. It is bordered to the north by East Bay Drive, Erie Coke facility, and Lake Erie; to the south by East 3rd Street and residential neighborhoods; to the east by Hess Avenue and residential neighborhoods; and to the west by East Bayfront Parkway (Figures 1 and 2). Land use is primarily residential. The area also includes a large parcel occupied by National Fuel Gas Corporation and a large parcel occupied by the Barber National Institute, which includes Elizabeth Lee Black School (Figure 2). The Barber National Institute and Elizabeth Lee Black School (approved private school) provide a range of adult day programs and Small Group Employment, an adult mental health program, and administrative offices (Ref. 3).




 Location of Latitude and Longitude Measurement
 East Avenue Study Area


Source: Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community
 EPA Contract No: 68-HE-032-D0003 TD No: T603-23-09-001



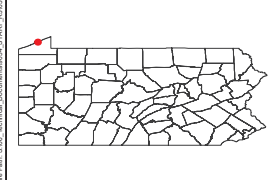
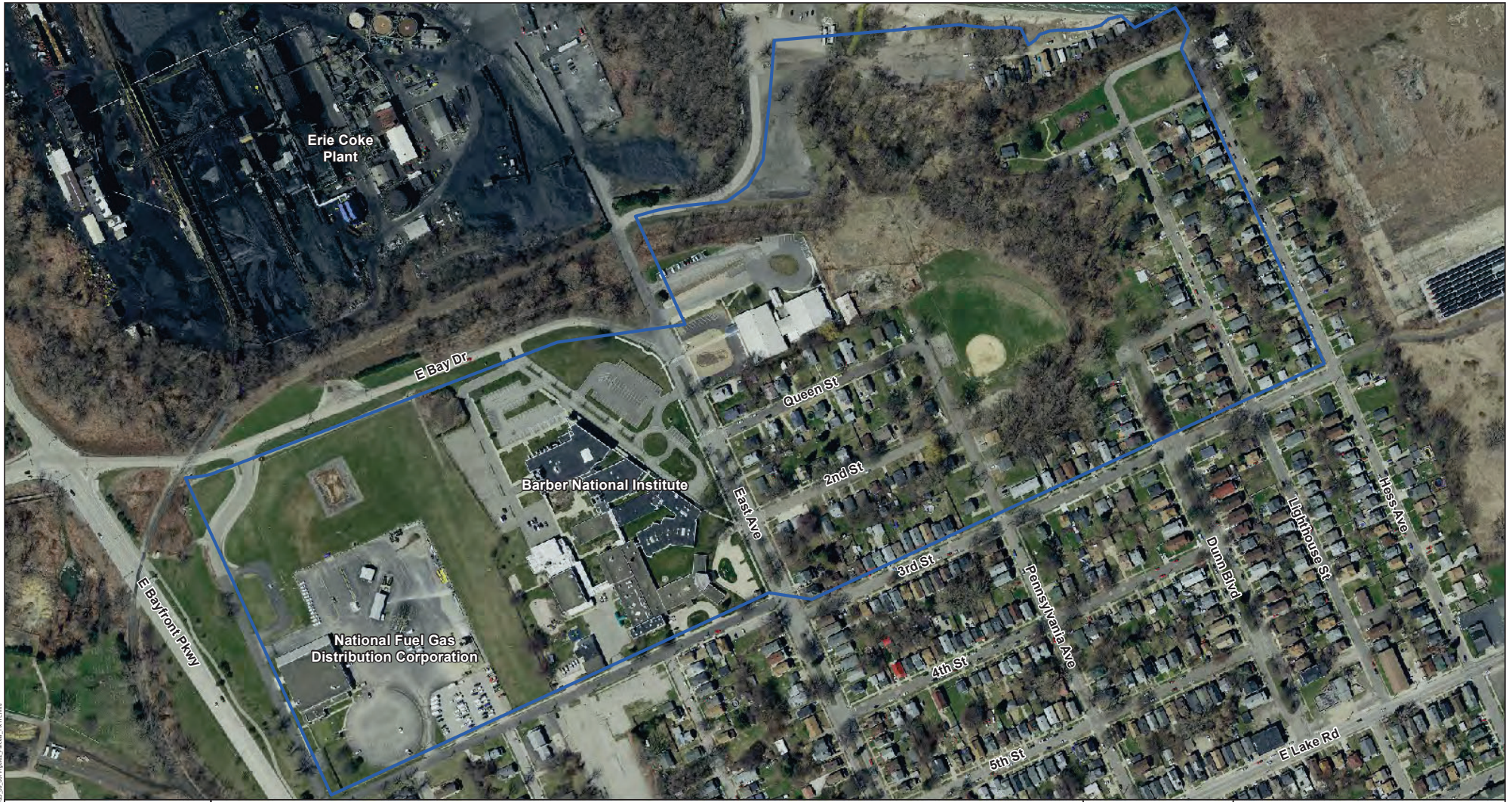
East Avenue Study Area
 Erie, Erie County, Pennsylvania

Figure 1
Site Location and Study Area



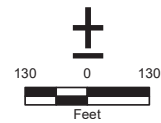
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 East Avenue Study Area

Source: PEMA
 EPA Contract No: 68-HE-032-00003 TD No: T603-23-09-001



East Avenue Study Area
 Erie, Erie County, Pennsylvania

Figure 2
Site Inspection Study Area



Prepared For: EPA START R3 VI Prepared By: **Tetra Tech**
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3.2 SITE HISTORY

The City of Erie became an important port and manufacturing center, known as "the Boiler and Engine Capital of the World" in the 1800s to mid-1900s. At this time, the city had many industrial unregulated air emissions resulting from combustion, smelting, and railroads that may have released hazardous substances to air and soil in the Study Area (Refs. 4; 5). The Erie Coke Plant has been identified as the primary source of possible soil contamination from air emissions near the Study Area and is described below. There are also numerous other facilities in the City of Erie with air emissions containing hazardous substances that may have contributed to soil contamination in the Study Area. These other possible sources of air emissions are summarized in Section 4.0.

An industrial manufacturing facility has operated on the Erie Coke Plant property, north of the Study Area since about 1833 (Figure 3). The Jarvis Company, and later, the Perry Iron Company operated a blast furnace on the plant from 1833 to 1925. Pickand, Mather & Co. began to operate 37 coke ovens in 1925. Interlake Iron Company (also known as Perry Furnace Company), began to operate an additional 35 coke ovens, known as "B-Battery" in 1942. The original 37 ovens were replaced by 23 new coke ovens, known as "A Battery" in 1952. Steel and coke production at the plant stopped in 1967. Interlake Iron Company restarted the coke ovens under an agreement with Koppers Company, Inc. in 1970. Koppers Company, Inc. began to lease and operate the coke ovens in 1974. Koppers Company, Inc. bought the plant in 1980 and operated the coke ovens until it sold the plant to Erie Coke Corporation in 1987. Erie Coke Corporation acquired and began to operate the plant in 1987, including the 58 coke ovens, a coke oven battery under-firing system, two boilers, a byproduct tar recovery system, associated railroad lines, and a wastewater treatment system (Ref. 6).

Erie Coke Corporation announced the immediate and permanent closure of the plant and completed the shutdown of the coke ovens and by-products recovery plant in December 2019 (Ref. 6). PADEP installed nine air monitors along Erie Coke's property boundary between the plant and the community. Four additional monitoring locations were established throughout the community. PADEP also established a meteorological tower at the Erie Wastewater Treatment Plant to provide data on wind speed and direction, temperature, and other items needed to assist in interpreting the results. The monitors are passive sorbent sampling tubes designed to determine the concentrations of benzene, toluene, ethyl benzene, and xylene at the sampling locations. The sampling was conducted 24 hours a day, seven days a week. Every two weeks, the tubes were collected, and new tubes are placed in the sampler (Ref. 7). The highest concentration of benzene in the air samples was found in the sample from the Erie Coke facility, location PADEP Erie Coke Plant 01 (Ref. 8).

According to the Toxics Release Inventory (TRI), the Erie Coke Plant released the following to air through the on-site air stack or fugitive emissions: ammonia, anthracene, benzene, benzo[g,h,i]perylene, cresol, dibenzofuran, ethylene, hydrogen sulfide, lead compounds, mercury, naphthalene, phenanthrene, phenol, polycyclic aromatic hydrocarbons (PAH), propylene, toluene, and xylene (Ref. 9).

The total quantities released by year are in Attachment 1. Coke oven emissions are a mixture of coal tar, coal tar pitch, volatiles, creosote, PAH, and metals. PAH are semi-volatile compounds. Over 20 PAH are found in coke oven emissions, including benzo(a)pyrene, benzanthracene, chrysene, and phenanthrene. Approximately 80 percent of coal tar is unspecified carbon chains (C18-22) and coal tar volatiles, including benzene, toluene, and xylenes (Ref. 9).

The Erie Coke Plant has a long history of violations under Pennsylvania's environmental laws. These violations resulted in neighborhood complaints about air quality, several Notices of Violations issued by Pennsylvania Department of Environmental Protection (PADEP), penalty assessments, permit denials, and negotiations and entries into Consent Decrees and Administrative Orders to address conditions at the plant (Ref. 10).

PADEP joined EPA in a civil action against the Erie Coke Corporation related to repeated violations of federal and state air regulations at Erie Coke Plant on September 22, 2009. These violations include failure to prevent the release of fugitive and visible emissions, exceedances in particulate matter emissions, and failure to fully monitor and characterize all emissions from the plant (Refs. 11; 12).

PADEP issued an Administrative Order to Erie Coke Corporation to cease operations of the coking plant due to continued violations of federal and state environmental requirements on May 24, 2010. However, the company obtained a temporary stay from the Pennsylvania Environmental Hearing Board and continued to operate (Ref. 11).

For violation of the Clean Air Act (CAA) and other charges Erie Coke Corporation was indicted by a federal grand jury in November 2022. At this time, Erie Coke Corporation was out of operation. The indictment states that, from 2015 to 2019, Erie Coke Corporation tampered with measurements on heating systems, which emitted contaminants and pollutants into air, including volatile gases such as benzene, toluene, and xylene (Ref. 13).

4.0 SOURCE CHARACTERISTICS

The conceptual model developed for the Study Area describes soil contamination from air emissions primarily from the Erie Coke Plant and potentially from other sources. Soil contamination from releases primarily from the Erie Coke Plant may include ammonia, anthracene, benzene, benzo[g,h,i]perylene,

cresol, dibenzofuran, ethylene, hydrogen sulfide, lead compounds, mercury, naphthalene, phenanthrene, phenol, PAH, propylene, toluene, and xylene.

There are industrial facilities other than the Erie Coke Plant that were or are possible sources of hazardous substance releases to air that may have deposited onto soil in the Study Area. Some of these facilities operated for many years with few pollution controls and are summarized in Section 4.1. Emissions from stationary and mobile sources were not regulated until the early 1970s when the CAA was passed (Ref. 4). Emissions from the facilities that operated under the CAA regulations are summarized in Sections 4.2 through 4.12. The locations of regulated facilities are shown in Figure 3.

Sources of air emissions are regulated under the CAA. The CAA requires EPA to set National Ambient Air Quality Standards for six commonly found air pollutants known as criteria air pollutants (CAP). CAP include ozone, particulate matter (PM), carbon monoxide (CO), lead, sulfur dioxide (SO₂), and nitrogen dioxide (NO_x). PM is solid particles and liquid droplets in the air, including particle pollution. Some particles are large or dark enough to be visible, including dust, dirt, soot, and smoke. Others are so small they can only be detected with an electron microscope. Particle pollution includes PM₁₀, which are inhalable particles with diameters that are less than or equal to 10 micrometers and smaller, and PM_{2.5}, which are fine inhalable particles with diameters that are less than or equal to 2.5 micrometers. Particulate matter contains microscopic solids or liquid droplets that are so small that they can be inhaled and cause serious health problems. Some particles less than 10 micrometers in diameter can get deep into the lungs and some may even get into the bloodstream. Of these, particles less than 2.5 micrometers in diameter, also known as fine particles or PM_{2.5}, pose the greatest risk to health.

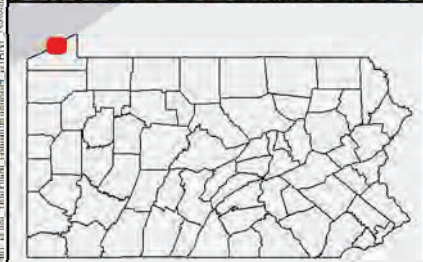
The CAA also requires the EPA to regulate hazardous air pollutants (HAP), also known as air toxics. HAP are known to cause cancer and other serious health impacts.

Facilities with air emissions have the following two types of CAA permits:

1. Major Source Operating Permit (MSOP) – allows a facility to emit at least 100 tons per year of total suspended particulates (TSP), PM₁₀, PM_{2.5}, SO₂, NO_x, CO, and volatile organic compounds (VOC).
2. Minor Emission Source Permit – the facility cannot emit more than 100 tons per year of TSP, PM₁₀, PM_{2.5}, SO₂, NO_x, CO, and VOC.

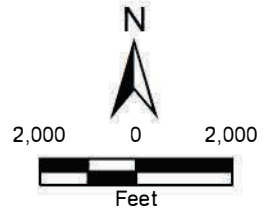


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- Facilities with Possible Sources of Emissions
- ▲ Study Area Center
- East Avenue Study Area

Source: Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community



East Avenue Study Area
Erie, Erie County, Pennsylvania

Figure 3
Facilities with Possible Sources of Emissions



Prepared For: EPA R3 START VI

Emissions from facilities are reported in the TRI. Tetra Tech accessed the TRI to obtain air emissions data around the Study Area. To identify potential sources of air emissions at, or near, the Study Area, Tetra Tech also reviewed the history of the Study Area using readily available, standard historical sources, including Environmental Data Resources, Inc. (EDR) reports, Sanborn fire insurance maps, historical aerial photographs, historical topographic maps, the EPA Enforcement and Compliance History Online (ECHO) search, the EPA Superfund Enterprise Management System database, the EPA Envirofacts search, and the NEPAassist tool. The findings are summarized in the sections below. The locations of possible sources of air emissions near the Study Area are shown in Figure 3.

4.1 OTHER HISTORICAL SOURCES OF AIR EMISSIONS

Some of the other industries in the City of Erie that may also have been sources of emissions to air in the 1800s and early to mid-1900s, before the CAA was passed, are summarized in Table 1. No air emissions data for these sources is available because the sources were not permitted.

**Table 1.
City of Erie – Sources of Air Emissions in the 1800s and Early to
Mid-1900s**

Ball Engine Works
Bay State Iron Works
Chicago and Erie Stove Company
Cleveland and Company Foundry
Davenport, Fairbairn, and Company Works
Eclipse Lubricating Oil Company
Erie Car Works
Erie City Iron Works
Erie City Nickel Plating Company
Erie Engine Works
Erie Gas Company
Erie Malleable Iron Company
Erie Rubber Company
Erie Stem Bending Works
Jarecki Chemical Works
Jarecki Manufacturing Company (Galvanizing and Iron Foundry)
Mt. Hickory Iron Company
Presque Isle Iron Works
Root and Burrows Nickel Plating and Metal Finishing Works
Selden and Griswold Manufacturing Company
Skinner and Woods Engine Works
South Erie Iron Works
Stonemetz Printers Machinery Company

Table 1.
City of Erie – Sources of Air Emissions in the 1800s and Early to Mid-1900s

T.M. Nagel (Manufacturer of Steam Engines)
Taper Sleeve Pulley Works
Watson’s Paper Mills

Source: Ref. 5

During World War II, defense contracts were granted to Hammermill, General Electric (GE), and Lord Corporation, which were in the City of Erie. Erie's port was a major trans-shipment point for coal, iron, and grain. Hammermill, the American Sterilizer Company, and GE specialized in the manufacture of locomotives, rapid transit, and commuter cars in the 1970s and 1980s. The new Eriez Magnetics began building magnetic iron separators in 1942. Zurn Industries, founded in 1900, made pollution-control and energy systems and took over several local firms in the 1970s. The plastics industry expanded in the 1980s to more than 40 companies. These manufacturers are likely to have been sources of air emissions containing hazardous substances (Ref. 4). Sections 4.2 through 4.12 below summarize information on other potential sources of air emissions near the Study Area that were regulated under the CAA.

4.2 ERIE WASTEWATER TREATMENT PLANT - INCINERATOR

Erie Wastewater Treatment Plant (Erie Plant) is the wastewater treatment plant for the City of Erie. It is owned by the Erie Sewer Authority, and it is at 68 Port Access Road, just northwest of the Study Area (see Figure 3). It holds MSOP, Title V Permit number PA000278806 (Ref. 14). The permit was issued on July 19, 2019, and expires on June 30, 2024 (Ref. 15).

According to the National Emissions Inventory (NEI) for the Erie Plant, the permit regulates 59 pollutant emissions and requires the permittee to annually calculate the actual emission rate of all regulated air pollutants for the previous year. The NEI presents 10 years of EPA air emissions data for the Erie Plant and includes, but is not limited to PM10, PM2.5, SO₂, NO_x, CO, VOC, and HAP. In 2014, the Erie Plant emitted a total of 75,496.26 pounds of CAP, 1,848.56 pounds of HAP and 13,604.00 pounds of total VOC. In 2017, it emitted a total of 43,527.80 pounds of CAP, 1,177.89 pounds of HAP, and 12,753.00 pounds of total VOC, and, in 2020, it emitted a total of 89,582.40 pounds of CAP, 2,013.37 pounds of HAP, and 14,004.60 pounds of total VOC. The three-year compliance history from ECHO shows four quarters of no compliance under the CAA due to cadmium emissions, which is a high priority violation and multiple failures of tetrachloroethylene stack tests (Ref. 16).

4.3 LAKE ERIE BIOFUELS

Lake Erie Biofuels is an “all-other basic organic chemical manufacturer,” owned by SB Erie Properties, LLC (hereinafter “Biofuels”). It is at 1540 East Lake Road, just northeast of the Study Area. It is classified as a minor emission source and cannot emit more than 100 tons per year of TSP, PM10, PM2.5, SO₂, NO_x, CO, and VOC (Ref. 17).

According to the Toxic Release Inventory (TRI) reports filed by the facility, air emissions include methanol, chromium, and manganese via fugitive or stack emissions since 2007, and approximately 39,688 pounds of methanol has been released since 2007. From 2007 to 2023, the facility has filed TRI Form R’s for methanol and, only in 2007, for chromium, lead, and manganese (Ref. 17; 18). The three-year compliance history from ECHO showed no air violations (Ref. 19).

4.4 ERIE INTERNATIONAL PAPER COMPANY

The Erie International Paper Company (Erie Paper) is, or has been, a paper mill, a pulp mill, or both. It is at 1540 East Lake Road, about 0.634 miles east of the Study Area. CAA information was not available for this facility. According to TRI reports filed by Erie Paper, air emissions since 1987 include acetaldehyde, acetone, ammonia, barium compounds, glycol ethers, chlorine, chlorine dioxide, chloroform, copper compounds, dioxin and dioxin like compounds, hydrochloric acid, lead compounds, manganese compounds, mercury compounds, methanol, methyl ethyl ketone, phenol, sodium hydroxide, sulfuric acid, and zinc compounds via fugitive or stack emissions. Approximately 0.0007347 grams of dioxin and dioxin-like compounds were released in 2000, and 0.0008469 grams were released via stack emissions in 2001. A total of 337,000 pounds of acetaldehyde was released from 1987–2002. The total emissions of the above-listed air pollutants are about 24,886,000 pounds (Ref. 20).

Erie Paper released more than 100 tons of HAP from 1995 to 1996. According to the facility’s TRI submittal, it emitted the following: acetaldehyde from 1994 to 2001, acetone from 1988 to 1993, ammonia from 1993 to 2001, barium compounds from 1997 to 2001, catechol from 1988 to 2001, glycol ethers from 1994 to 1997, chlorine from 1987 to 2001, chlorine dioxide from 1987 to 2001, chloroform from 1987 to 1996, copper compounds from 1994 to 2001, dioxin and dioxin-like compounds from 2000 to 2001, formic acid from 1994 to 1996, hydrochloric acid from 1990 to 2002, lead compounds from 2001 to 2002, manganese compounds from 1997 to 2001, mercury compounds from 2000 to 2002, methanol from 1987 to 2001, methyl ethyl ketone from 1989 to 1992, phenol from 1992 to 1993, sodium hydroxide from 1987 to 1998, sulfuric acid from 1987 to 2002, and zinc compounds from 1997 to 2001 (Ref. 21). The three-year compliance history from ECHO showed no air or violation information.

4.5 ACCURIDE (FORMER KAISER ALUMINUM)

Accuride (former Kaiser Aluminum) is a fabricated metal product manufacturer owned by AGNL Wheels, LLC. It is at 1015 E. 12th street, about 0.813 miles southeast of the Study Area. It is classified as a minor emission source (Ref. 15; 22).

According to TRI reports filed by the facility, since 1987 it has emitted 3,046.61 pounds of organic and inorganic compounds via fugitive or stack emissions (Ref. 22; 23; 24). Lead is one of the inorganic compounds emitted from the facility. The three-year compliance history from ECHO identified two violations under the CAA. The specifics related to the violation are not identified (Ref. 25).

4.6 DONJON

Donjon is a ship building and repairing facility owned by Donjon Ship Building, LLC. It is at 220 East Bayfront Parkway, about 0.965 miles northwest of the Study Area. It is classified as a synthetic minor emission source and cannot emit more than 100 tons per year of TSP, PM10, PM2.5, SO₂, NO_x, CO, and VOC (Ref. 15; 26).

According to the NEI, the facility has 6 pollutant emissions, including VOC and CAP. The NEI presents 10 years of EPA air emissions data for Donjon. This includes, but is not limited to, PM10, PM2.5, SO₂, NO_x, CO, and VOC. In 2014, this facility emitted a total of 75,682.01 pounds of CAP and 6,100 pounds of total VOC (Ref. 27). The three-year compliance history from ECHO showed no air violations (Ref. 28).

4.7 ERIE FORGE AND STEEL

Erie Forge and Steel (Erie Forge) is a machine shop and manufacturer of fabricated metal products owned by Erie Forge and Steel, Inc. It is at 1341 W. 16th Street, about 3.11 miles southwest of the Study Area. This facility is classified as a minor emission source. It previously held MSOP Title V permit PA0000004204900014. The MSOP is permanently closed (Ref. 29).

According to TRI reports filed by the facility, it emitted 29,616.90 pounds of organic and inorganic compounds via fugitive or stack emissions since 1988 (Ref. 29; 30). The three-year compliance history from ECHO showed no air violations (Ref. 31).

4.8 UNITED BRASS WORKS (KEYSTONE FOUNDRY)

United Brass Works (United Brass) was previously listed as an “other” nonferrous metal foundry. It manufactures plumbing, fixture fittings, and trim. It is owned by United Brass Works, Inc. and is at 944 W. 12th Street, about 2.494 miles west of the Study Area. It is classified as a minor emission source (Ref. 32; 33).

According to TRI reports filed by the facility, since 1988 it emitted 283,202.60 pounds of inorganic compounds via fugitive or stack emissions (Ref. 32). The three-year compliance history from ECHO showed no air violations (Ref. 34).

According to NEI, the facility has three pollutant emissions, including CAPS, TRI Air Toxics, TRI Criteria Pollutants, TRI HAP, and TRI persistent bioaccumulative toxics (PBT). The NEI shows 10 years of EPA air emissions data for the facility, including, but not limited to PM10, PM2.5, SO₂, NO_x, CO, and VOC (Ref. 35). The emissions reported in the NEI for United Brass Works are listed in Table 2.

**Table 2. United Brass Works
National Emission Inventory Summary**

Year	CAP (Pounds)	TRI Air Toxics (Pounds)	TRI Criteria Pollutants (Pounds)	TRI HAP (Pounds)	TRI PBT (Pounds)
2013	Not Reported	244	18	18	18
2014	Not Reported	303	23	23	23
2015	Not Reported	234	18	18	18
2016	Not Reported	223	16	16	16
2017	15	201	15	15	15
2018	Not Reported	231	17	17	17
2019	382	32	32	32	32
2020	20	268	20	20	20
2021	Not Reported	420	30	30	30
2022	Not Reported	491	31	31	31

Notes:

CAP Criteria air pollutants PBT Persistent bioaccumulative toxics
HAP Hazardous air pollutants TRI Toxic Release Inventory
Source Reference 32

According to the EDR Report that Tetra Tech obtained, this facility was listed on the Activity Use and Limitation Report database indicating that it has an Environmental Covenant with a recorded date of August 27, 2018. This facility was also listed in the Voluntary Cleanup Program database due to contamination in groundwater and soil (Ref. 15).

4.9 FORMER EMI/GUNITE SITE

Former EMI Gunitite Plant (EMI) is an iron foundry owned by the Gunitite Corporation. It is at 603 West 12th Street, about 2.134 miles west of the Study Area. This facility is not identified with CAA information. It is not classified as a minor or major emitter (Ref. 36). According to TRI reports filed by the facility, since 1987 it has emitted 218,955.80 pounds of organic and inorganic compounds via fugitive or stack emissions

(Ref. 37). The three-year compliance history from ECHO showed no information on air violations (Ref. 36; 37).

According to the EDR Report that Tetra Tech obtained, this facility was listed on the Voluntary Cleanup Program database due to contamination in groundwater and soil (Ref. 15).

4.10 LORD CORPORATION

Lord Corporation is a plastics and rubber product manufacturer owned by the Parker Hannifin Corporation (Lord Corp). It is at 1635 W. 12th Street, about 3.42 miles west of the Study Area. It is classified as a minor emission source (Ref. 38).

According to TRI reports filed by the facility, since 1987 it has emitted 942,193.20 pounds of organic and inorganic compounds via fugitive or stack emissions (Ref. 39). The three-year compliance history from ECHO showed no information identifying air violations (Ref. 38; 39). Table 3 summarizes emissions at the Lord Corporation facility (Ref. 40).

**Table 3. Lord Corporation
National Emission Inventory Summary**

Year	CAP (Pounds)	TRI Air Toxics (Pounds)	TRI Criteria Pollutants (Pounds)	TRI HAP (Pounds)	TRI PBT (Pounds)	TRI Ozone Precursors (Pounds)	VOC (Pounds)	HAP (Pounds)
2013	Not Reported	15,131.0	0.30	15,131.0	0.30	15,131.0	Not Reported	Not Reported
2014	46,106.40	1.40	1.40	1.40	1.40	Not Reported	17,010.00	17,542.56
2017	39,586.00	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	33,940.00	36,600.00
2018	43,940.00	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	38,100.00	31,068.28

Notes:

CAP	Criteria Air Pollutants	TRI	Toxic Release Inventory
HAP	Hazardous Air Pollutants	VOC	Volatile organic compounds
PBT	Persistent bioaccumulative toxics		
Source	Reference 39		

4.11 ZURN INDUSTRIES

Zurn Industries is an administrative and support services provider owned by Zurn Industries, LLC (Zurn). It is at 1801 Pittsburgh Avenue, about 4.01 miles southwest of the Study Area. This facility was previously classified as a minor emission source (Ref. 41).

According to TRI reports filed by the facility, since 1994 it has emitted 291,755.39 pounds of both organic and inorganic compounds via fugitive emissions (Ref. 42). The facility filed TRI Form R for releases of organic and inorganic compounds from 1990 to 2009. The three-year compliance history from ECHO showed no air violations (Ref. 41; 42).

4.12 WABTEC (FORMER GE)

Wabtec (former GE) is a fabricated metal product manufacturer owned by the Wabtec Corporation (Wabtec). It is at 2901 E. Lake Road, about 1.63 miles east of the Study Area. It holds MSOP, Title V permit number PA000258442 (Ref. 43).

According to TRI reports filed by the facility, since 1987 it has emitted 8,254,337 pounds of organic and inorganic compounds via fugitive or stack emissions, and 0.0111641 pounds of dioxin and dioxin-like compounds were released from 2000 to 2007 (Ref. 44). The facility filed a TRI Form R for releases of organic and inorganic compounds from 1987 to 2022. The three-year compliance history from ECHO showed no information identifying air violations (Ref. 43; 44). Table 4 summarizes emissions at the Wabtec facility (Ref. 45).

**Table 4. Wabtec
National Emission Inventory Summary**

Year	CAP (Pounds)	TRI Air Toxics (Pounds)	TRI Criteria Pollutants (Pounds)	TRI HAP (Pounds)	TRI PBT (Pounds)	TRI Ozone Precursors (Pounds)	Total VOC (Pounds)	Total HAP (Pounds)	Total GHG (Pounds and MTCO2e)
2013	Not Reported	531	1.00	520	1.00	Not Reported	Not Reported	Not Reported	63,194.71 (MTCO2e)
2014	908,483.66	1,755.90	.90	1,756.00	.90	Not Reported	303,441.80	2,402.80	65,795.35 (MTCO2e)
2015	Not Reported	1,526.50	1.00	1,515.50	1.50	.50	Not Reported	Not Reported	64,083.11 (MTCO2e)
2016	Not Reported	531.30	1.00	520.30	1.30	.30	Not Reported	Not Reported	57,094.68 (MTCO2e)
2017	381,938.89	218.20	1.20	205.00	1.20	Not Reported	88,057.20	145,179.92	54,630.54 (MTCO2e)
2018	Not Reported	210.00	Not Reported	200	Not Reported	Not Reported	Not Reported	Not Reported	61,034.92 (MTCO2e)
2019	Not Reported	130.10	.10	129.00	.10	Not Reported	Not Reported	Not Reported	59,700.08 (MTCO2e)
2020	293,370.39	119.20	.20	116.00	.20	Not Reported	69,796.40	3,246.71	56,168.99 (MTCO2e) 123,705,951.28 (Pounds)
2021	Not Reported	49.20	.20	47.00	.20	Not Reported	Not Reported	Not Reported	42,422.54 (MTCO2e)
2022	Not Reported	128.10	.10	122.00	.10	Not Reported	Not Reported	Not Reported	40,785.90 (MTCO2e)

Notes:

CAP	Criteria Air Pollutants	TRI	Toxic Release Inventory
GHG	Greenhouse Gases	VOC	Volatile organic compounds
HAP	Hazardous Air Pollutants	MTCO2e	Metric tons of CO ₂ emitted
PBT	Persistent bioaccumulate toxics		
Source	Reference 44		

5.0 ENVIRONMENTAL JUSTICE SCREEN (EJSCREEN)

EJSCREEN provides information on thirteen different EJ Indexes. Each EJ Index combines one environmental measure with demographic data to characterize potential areas of EJ concern that may warrant further consideration, analysis, or outreach.

According to the EJSCREEN Common User Guidelines, a site will be considered a good candidate for additional review when an EJSCREEN analysis for that area shows one or more of the thirteen Primary EJ Indexes is at or above the 80th percentile in the nation. An area may also warrant additional review if other readily available information suggests the potential for EJ concerns. An EJSCREEN analysis that does not reveal the potential for EJ concerns should not be interpreted to mean that there are definitively no EJ concerns present. For this assessment, information was considered on the block group that contains the study area as well as using a one-mile radius around a center point of the residential housing in the study area.

One or more of the thirteen Primary EJ Indexes is at or above the 80th percentile in the nation and state for the block group that contains 42.142392, -80.063533 and a one-mile radius around a center point of the housing in the study area. The area around the center point also exceeds the state average for the percentage of populations of low income, people of color, limited English speaking households, less than high school education, and low life expectancy. The EJSCREEN standard report is in Attachment 2.

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

6.0 SOIL EXPOSURE

This section discusses the soil exposure and the associated receptors and draws component-specific conclusions.

According to the United States Department of Agriculture, National Resources Conservation Service soil survey of Erie County, Pennsylvania, the urban land complex is the predominant soil type in the Study Area (Ref. 47).

The Study Area is in the City of Erie with a population of approximately 92,511 persons (Ref. 48). Eighteen schools are in the City of Erie. In addition to residents, there are many schools, places of work, and recreation in, and around, the City of Erie that may be exposed to potential surface soil contamination. Based on the U.S. Census estimated population data, the residential population within a 4-mile radius is distributed as follows: 0- to 0.25-mile, 769 persons; 0.25- to 0.50-mile, 2,996 persons; 0.50- to 1.0-mile, 10,896 persons; 1- to 2-miles, 27,464 persons; 2- to 3-miles, 51,086 persons; and 3- to 4-miles, 61,508 persons (Ref. 49). There are also terrestrial ecological receptors.

PADEP installed nine air monitors in the Study Area, including a meteorological tower at the Erie Wastewater Treatment Plant to provide data on wind speed and direction. The wind roses show that although the primary wind direction is from the west and south (from the Study Area towards Lake Erie and the Erie Coke Plant) the wind direction does change, and, at times, the wind direction is from the east and north (from Lake Erie and the Erie Coke Plant, toward the Study Area). Therefore, any releases to air from the Erie Coke Plant have the potential to release to soil in the Study Area. Releases of benzene from the Erie Coke Plant have been documented in the Study Area (Ref. 8).

7.0 FIELD PROCEDURES

This section describes the SI scope of work that Tetra Tech will perform, including proposed sampling activities and field measurements; summarizes samples to be collected for the project; explains sample collection and handling procedures; and describes equipment decontamination procedures and the disposal of investigation-derived waste generated during sampling.

7.1 SAMPLING LOCATIONS AND RATIONALE

This SI will include the collection of surface soil samples from the Study Area and background soil samples. To evaluate the presence of soil contamination within the Study Area, surface soil samples will be collected from those properties to which access is granted using Incremental Sampling Methodology (ISM), as shown in Figure 2. Grab surface soil sample(s) will also be collected from a location(s) with highest X-ray fluorescence (XRF) screening for lead. To date, the number of parcels to be sampled and the number of ISM and grab samples to be collected have not been determined and are dependent on gaining access to properties within the Study Area. Table 5 summarizes the nomenclature for the sample identifications.

The ISM procedure has been selected because incremental sampling is a structured sampling protocol that reduces data variability and increases sample representativeness. The objective of incremental sampling is to obtain a single sample for analysis that has an analyte concentration representative of the decision unit, such as a front, back or entire yard, lessening the chance of missing significant contamination.

ISM sampling provides reproducible estimates of mean concentrations of analytes in the specified volume of soil within a decision unit (DU), such as a residential front and back yard. For properties that are greater than 1 acre, Tetra Tech will collect two 30-point composite surface soil samples within 0 to 4 inches below ground surface (bgs) at each residential property. A 30-point, composite surface soil sample will be collected from each DU, with the front yard and the back yard being separate DUs. The composite soil samples will be collected by spacing of aliquots across the DU as evenly as possible within each DU. For properties that are less than one acre, Tetra Tech will collect one 30-point composite surface soil sample within 0 to 4 inches bgs at each residential property. A 30-point composite surface soil sample will be collected from the entire yard (front and back) to comprise one DU for a composite ISM sample within one DU. The composite soil samples will be collected by spacing of aliquots across the DU as evenly as possible. Background surface soil samples will be collected to document background concentrations of contaminants. The background sampling locations will be identified during a site reconnaissance or during the field sampling investigation. The locations will be near the Study Area and at a location with similar land use and soil type as the Study Area.

**Table 5. Sampling Location and Rationale
Study Area Surface Soil Samples**

Sample ID	Depth (Inches bgs)	Sample Type	Container	Rationale
Soil Samples				
EA###-GB	0 to 24	Grab	Five, 4-oz. glass jars	Determine presence, or absence, of contamination
EA###-FY	0 to 4	30-Point ISM	Plastic Ziploc bag	
EA###-BY	0 to 4	30-Point ISM	Plastic Ziploc bag	
EA###-EY	0 to 4	30-Point ISM	Plastic Ziploc bag	
EA###-GB	0 to 24	Grab	Five, 4-oz. glass jars	Determine background concentrations. ¹
EA###-FY	0 to 4	30-Point ISM	Plastic Ziploc bag	
EA###-BY	0 to 4	30-Point ISM	Plastic Ziploc bag	
EA###-EY	0 to 4	30-Point ISM	Plastic Ziploc bag	
(Original Sample ID)	0 to 24	Grab	Two, 4-oz. jars	Provide information about the effect of each sample matrix on the sample preparation procedures and measurement methodology. For every 20 samples collected per matrix, one MS/MSD sample will be designated.
(Original Sample ID)	0 to 4	30-Point ISM	Plastic Ziploc bag	
(Original Sample ID)-DUP	0 to 24	Grab	Two, 4-oz. glass jars	Measure both field and laboratory precision. For every 20 samples collected per matrix, one duplicate sample will be collected.
(Original Sample ID)-DUP	0 to 4	30-Point ISM	Plastic Ziploc bag	
(Original sample ID)-DUP/TRI	0 to 4	30-Point ISM	Plastic Ziploc bag	Measure both field and laboratory precision. For every 20 samples collected per matrix, one field triplicate sample set will be collected.

Notes:

¹Two background samples will be collected for every 20 samples collected. The location of the background, duplicate, and triplicate sample will be identified in the field.

###	Sample Number	FY	Front yard
Bgs	Below ground surface	ID	Identification
BY	Back yard	ISM	Incremental sampling methodology
DUP	Duplicate	MS/MSD	Matrix Spike/Matrix Spike Duplicate
EA	East Avenue Study Area	Oz.	Ounce
EY	Entire yard	TRI	Triplicate

7.2 SAMPLING PROCEDURES

The procedures for the collection of surface soil samples are described in the section below. All sample locations will be photographed, and sample descriptions will be logged in the field logbook in accordance with Tetra Tech Standard Operating Procedure (SOP) No. 024-4, “Recording Notes in Field Logbooks” (Ref. 50). Global positioning system (GPS) coordinates will be collected at each soil sample location using a sub-meter GPS transceiver.

7.2.1 In Situ XRF Screening

START will conduct in situ screening with an XRF at 15 of the 30 ISM incremental sample locations before the ISM incremental sample is collected for purposes of identifying grab sample locations on each property before sampling. The samples will be screened for arsenic, barium, cadmium, chromium, lead, and mercury known metals substances associated with nearby industries. START personnel will use a hand trowel to clear any vegetation or debris from the ground so that surface soil is exposed, then place a plastic bag between the surface soil and the XRF instrument prior to screening. Results will be recorded in the logbook as well as on the XRF device. Data will be extracted at the completion of the sampling event. A grab surface soil sample will be collected at the incremental sampling location with the highest concentrations of screen metals. The grab sample collection procedures are described in Section 7.2.2. Each surface soil sampling location will be mapped using a GPS system, flagged, and recorded in the site logbook.

START will conduct all screening in accordance with EPA’s Environmental and Industrial Measurements Divisions SOP, Field X-Ray Fluorescence Measurement (Attachment 3). Each day prior to use, operational and quality control checks consistent with the guidance presented in Attachment 3 will be conducted on the XRF.

7.2.2 Surface Soil Sampling – Grab Sample Collection Procedure

Tetra Tech will collect one or more grab surface soil samples from each parcel at a location described in Section 7.2.1. Surface soil samples will be collected with dedicated stainless-steel trowels, stainless-steel augers, or dedicated plastic scoops. The specific depth intervals for soil samples may vary between sampling locations, but all will be collected between 0 and 2 feet bgs. Surface soil samples will be collected as biased grab samples based on XRF readings. A hand auger will be used for soil samples to be collected at depths greater than 0 to 24 inches bgs. The soil collected using a trowel or hand auger will be placed into dedicated aluminum pans. Stones and vegetation will be removed, and the sample will be thoroughly homogenized with a dedicated stainless-steel spoon or plastic scoop to obtain as uniform a texture and color as practicable prior to filling the appropriate sample containers. Samples will be placed in coolers and stored on ice at less than or equal to (\leq) 6 degrees Celsius ($^{\circ}$ C) until shipment to the assigned laboratory. If non-

dedicated sampling equipment is used, it will be decontaminated before reuse as described in Section 7.2.4. Surface soil samples will be analyzed for the parameters listed in Section 8.0.

7.2.3 Surface Soil Sampling - ISM Sample Collection Procedures

Soil samples will be collected from residential properties and the Barber Institute within the Study Area via application of ISM. The number of parcels to be sampled has not been determined; therefore, the number of ISM have not been determined. ISM soil samples will be collected from parcels where access is obtained within the Study Area. Access to all the parcels is not anticipated. ISM sampling provides reproducible estimates of mean concentrations of analytes in the specified volume of soil within a DU, such as a residential front and back yard. The following surface soil sampling activities are anticipated:

- Per consultation with EPA, Tetra Tech will collect soil samples in accordance with the Hawaii State Department of Health (HDOH) Technical Guidance Manual, “Site Investigation Design and Implementation” Sections 3 and 4 (Ref. 51) (Attachment 4).
- At each residential property that is greater than one acre, Tetra Tech will collect two composite surface soil samples at 0–4 inches bgs. Front yards and back yards will be considered separate DUs, and a 30-point, composite surface soil sample will be collected from each DU. Composite soil sample collection will space aliquots as evenly as possible within and across each DU. Questionnaires will be distributed to homeowners to determine if any chemicals have been applied to their yards.
- At each residential property that is less than one acre, Tetra Tech will collect one composite surface soil sample within 0–4 inches bgs. The entire yard (front and back) will be considered one DU, and a 30-point, composite surface soil sample will be collected from this DU. Composite soil samples will be collected by spacing aliquots as evenly as possible across the DU.
- Aliquots will be of uniform volume (an approximately 1-inch-diameter, 4-inch-long cylinder) and collected using an incremental sampling device.
- Tetra Tech will provide a description of the soil sample and note the presence of any waste in the sample, such as fill material.
- The sample will be placed into a 64-ounce glass jar and sent to a procured analytical laboratory for processing, in accordance with EPA SW-846 Method 8330B-Appendix A (Ref. 52).
- The soil sample will be sieved for a 150-micrometer (μm) particle size using a 150- μm sieve to meet the particle size recommendation for lead in the EPA 2016 Office of Land and Emergency Management (Ref. 53).

- A Tier IV laboratory will process the samples and send the processed sample to a Contract Laboratory Program (CLP) laboratory for TAL metals plus mercury, SVOC, and PAH by Selected-Ion Monitoring analyses.
- The appropriate number of quality control (QC) samples will also be collected during the sampling event, including field processed, replicate (triplicate) samples for all analyses and field and equipment rinsate blank samples, as appropriate.
- Replicate samples are multiple ISM samples collected from the same DU, each with its own unique set of increments. Replicates conform to the following: (1) consist of the same number of increments and (2) are collected by application of the same scheme and sampling pattern within the same DU (slightly offset to generate unique increments). A minimum of three samples is collected, including the primary sample and two replicates. The set is referred to as “triplicate” samples.
- To evaluate relative standard deviation and assess DU homogeneity, replicate (triplicate) field samples will be collected within DUs.

7.2.4 Equipment Rinsate Sampling and Decontamination

One equipment rinsate sample will be collected daily for each non-dedicated sampling device or for every 20 samples collected, whichever is more frequent. Rinsate samples are expected to be collected with the ISM sampling tool and hand auger, after the equipment has been decontaminated following the procedures in Tetra Tech SOP 002-6 “General Decontamination” (Ref. 54). The rinsate sample will be collected by pouring distilled, or reagent grade, de-ionized ultra-filtered water over the sampling device and collecting the water in a dedicated aluminum pan. The collected water will be transferred into the appropriate sample jars and preserved as specified in Table 6. The equipment rinsate samples will be analyzed for the same parameters as the associated sample matrix (soil).

8.0 ANALYTICAL PARAMETERS

The ISM analytical method includes soil sample processing of aliquots of soil in the analytical laboratory in accordance with Appendix K of the State of Hawaii, Department of Health, Site Investigation Design and Implementation (<https://health.hawaii.gov/heer/tgm/section-04/#appendix-4-k>). This includes drying, sieving, and subsampling in accordance with multi-incremental (MI) collection protocols for non-volatile contaminants. The processing laboratory will document specific sample processing and subsample collection methods in a report, rather than simply reference an applicable guidance document. Photographs of the processed samples will be requested to support the reliability of laboratory data. The processing laboratory will be laboratory certified with the required equipment (puck mill grinder) and will process the

samples via EPA SW-846 Method 8330B-Appendix A. Laboratories that have processed soil samples for EPA Region 3 include Agriculture and Priority Pollutants Laboratories, LLC, Test America, and EPA Region 10 laboratory.

Laboratory processing of MI samples typically consists of the following steps:

- Empty entire bulk sample onto a tray made of, or lined with, material compatible with the contaminant of interest and drying temperature;
- Spread evenly into a thin layer;
- Allow to air dry until a constant weight is established by re-weighing, or air dry until soil agglomerates are crushable;
- Sieve entire sample to the target particle size as defined in the DU designation process (for example, < 150 μm); and
- Subsample entire sieved portion using a sectorial splitter (preferred) or manual, MI sampling methods to collect appropriate mass for each targeted analysis (minimum ten grams recommended for the 150 μm particle size for all contaminants; including metals).

After processing, the processed samples will be analyzed under CLP Statement of Work for Superfund Analytical Methods (Multi-Media, Multi-Concentration) SFAM01.1 for organic and inorganic routine analytical services (Refs. 55; 56). The processed surface soil samples will not be analyzed for VOC.

The analytical parameters and method for sample matrices as well as the sample containers, preservatives and holding times are presented below:

Table 6. Analytical Methods, Containers, Preservatives, and Holding Time

Matrix	Analytical Parameter ¹	Analytical Method ¹	Number and Type of Sample Container	Preservation Method	Sample Holding Time
Soil Samples					
Soil – ISM	Not Applicable	Not Applicable	2, 64-oz. wide mouth glass jars	Cool to ≤ 6 °C	See below for holding times for the CLP analysis
Soil Samples After Processing					
ISM Processed and Grab Soil Samples	SVOC/PAH by SIM	SFAM01.1 or SW-846 Method 8270E	1, 8-oz. glass jars with Teflon-lined lid	Cool to ≤ 6 °C	14 days for extraction; extracts must be analyzed within 40 days following extraction
	TAL Metals Plus Mercury	SFAM01.1 or SW-846 6010D, and 7471B	1, 8-oz. glass jar with Teflon-lined lid		28 days for mercury and 6 months for all other metals
Aqueous Quality Control Samples					
Water	SVOC/PAH by SIM	SFAM01.1 or SW-846 Method 8270E	2, 1-Liter amber glass jars	Cool to ≤ 6 °C	7 days for extraction 40 days for analysis
	TAL Metals Plus Mercury	SFAM01.1 or SW-846 6010D, and 7471B	1, 0.5-Liter High-Density Polyethylene		6 months for metals 28 days for mercury

Notes:

¹ SFAM01.1, available at the following web address: <https://www.epa.gov/clp/superfund-analytical-methods-sfam011>. U.S. EPA, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846), available at the following web address: <https://www.epa.gov/hw-sw846>.

°C	Degrees Celsius	PAH	Polycyclic aromatic hydrocarbon
<	Less than	QC	Quality control
CLP	Contract Laboratory Program	SIM	Selected ion monitoring
EPA	U.S. Environmental Protection Agency	SFAM	Superfund Analytical Method
ISM	Incremental Sampling Methodology	TAL	Target Analyte List
Oz	Ounce		

Equipment rinsate samples will be analyzed for the same parameters as the sampled matrix. Table 7 provides a summary of the numbers of field and QC samples.

Table 7. Field and QC Sampling Summary

SAMPLE ID	SAMPLE TYPE	ANALYSIS	RATIONALE
(Original sample ID)	MSD	TAL Metals plus mercury	Provide information about the effect of each sample matrix on the sample preparation procedures and measurement methodology. One MSD sample will be designated for every 20 samples collected per matrix. Additional volume not required.
(Original sample ID)-DUP	Field Duplicate	SVOC/PAH by SIM and TAL Metals plus mercury	Measure both field and laboratory precision. One duplicate sample will be collected for each 20 samples collected per matrix.
EB-#	Equipment Rinsate Blank	SVOC/PAH by SIM and TAL Metals plus mercury	Determine efficacy of decontamination of sampling equipment between sampling locations. One rinsate sample collected per 20 samples or one per day, whichever is more frequent.
(Original sample ID)-DUP/TRI	Replicate	SVOC/PAH by SIM and TAL Metals plus mercury	To evaluate relative standard deviation and assess DU homogeneity, replicate (triplicate) field samples will be collected within each DU.

Notes:

##	Number to be determined in the field	PAH	Polycyclic aromatic hydrocarbon
DU	Decision Unit	SIM	Selected ion monitoring
EB	Equipment Blank	SVOC	Semi-volatile organic compounds
ID	Identification	TAL	Target Analyte List
MSD	Matrix Spike Duplicate	TRI	Triplicate

9.0 CHAIN OF CUSTODY

From the time each sample is collected to its final disposition, proper chain of custody will be maintained. Every transfer of custody will be noted and signed. When samples are not under direct control of the individual responsible for them, they will be stored in a locked container and sealed with a custody seal. Tetra Tech will use Scribe sample tracking software to prepare sample labels, tags, and chain of custody/traffic reports (COC/TR). COC/TR will include the following information at a minimum:

- CLP or Regional Sample Number, as applicable
- CLP Case Number or Regional Delivery of Analytical Services (DAS) Case Number
- Sample matrices
- Concentration (Note: Always specify “low concentration” for CLP samples unless directed otherwise by the project chemist or EPA analytical services coordinator (for example, Client Services Team [CST])).
- Specify sample type (grab or composite)
- Analyses requested
- Laboratory turn-around-time (TAT) (Note: This does not include the TAT for data validation. If preliminary results are required, this must be specified on the COC/TR).
- Regional specific tracking numbers (EPA Sample Tag Numbers) and number of containers
- Preservative(s)
- Sample identifier (sampler assigned sample number)
- Date and time of collection
- Corresponding CLP organic, or inorganic, sample number (if applicable)
- Field QC information
- Specify samples to be used for laboratory QC (MS/MSD)
- Signature(s) of sampler(s)
- Signature(s) of any individual(s) with control over samples
- Specify if shipment under the CLP or Regional DAS Case Number is complete (no additional sample shipments will be made under the Case Number)
- Carrier, air bill number, and date of the shipment

10.0 MEASUREMENT OF QUALITY OBJECTIVES

To specify quantity and quality of data to be acquired during the sampling event, data quality objectives (DQOs) were established for the Study Area. DQOs were developed using the seven-step process outlined in the following guidance documents: *EPA Requirements for Quality Assurance Project Plans*, EPA QA/R-5, March 2001; *Guidance for Quality Assurance Project Plans*, EPA QA/G-5, December 2002; and *Guidance on Systematic Planning Using the Data Quality Objectives Process*, EPA QA/G-4, February 2006.

10.1 FIELD QUALITY CONTROL PARAMETERS

All samples will be handled and preserved as described in Tetra Tech SOP 19-9 “Packaging and Shipping Samples” (Ref. 57), *Contract Laboratory Program Guidance for Field Samplers* (Ref. 58), and Table 6, as applicable.

All appropriate sampling equipment will be decontaminated, including non-disposable sampling equipment, before initial use and after the collection of each sample. Basic decontamination will consist of washing or brushing gross particulates off sampling equipment with tap water and a scrub brush, followed by washing equipment with a solution of Alconox and water and rinsing with distilled water. The water will be allowed to drain from the equipment, and the equipment will be wrapped in aluminum foil after decontamination to minimize potential contamination during handling.

To evaluate quality assurance at the Study Area, in accordance with the Tetra Tech Program QAPP (Ref. 2) and HDOH, the following samples will be collected:

- For every 20 soil samples, replicate (triplicate) field samples will be collected (composited ISM sample) and evaluated to determine field relative standard deviation, to assess DU homogeneity, and to measure both field and laboratory precision.
- Field duplicate samples will be collected for grab surface soil samples at a frequency of one duplicate per 20 samples collected for each matrix.
- Equipment rinsate samples will be collected daily, or one for every 20 samples collected using non-dedicated sampling equipment (for example, ISM sampler and hand auger).
- One field sample for soil will be designated for matrix spike/matrix spike duplicate (MS/MSD) or matrix spike/duplicate (MS/D) (for inorganics). These will be designated for samples of each media at a frequency of one sample per 20 samples collected or one per sample delivery group (SDG). EPA Region 3 does not require MS/MSD for SVOC.

10.2 DATA QUALITY INDICATORS

Data quality assessment to determine data quality and usability will include:

- A QA/QC review of field generated data and observations
- Individual data validation reports for all sample delivery groups
- Evaluation of QC samples such as equipment rinsate samples, field duplicates, MS/MSD, matrix spike/duplicate (MS/D), and laboratory QC samples to assess the quality of the field activities and laboratory procedures
- Assessment of the quality of the data measured and generated in terms of accuracy, precision, and representativeness
- Summary of the usability of the data, based upon the assessment of data conducted during the previous steps.

Quality attributes are qualitative and quantitative characteristics of the collected data. The principal quality attributes for environmental studies are precision, bias, representativeness, comparability, completeness, and sensitivity. Data quality indicators (DQIs) are specific indicators of quality attributes.

Performance criteria address the collection of samples and acceptance criteria address the use of the collected data.

10.2.1 Data Use

Validation of all analytical data will be performed by the Environmental Services Assistance Team (ESAT) contractor under the direction of the EPA Laboratory and Technical Services Branch (LTSB). Organic data will be validated at the Stage 4 (EPA Region 3 designation M3) level in accordance with EPA Contract Laboratory Program “*National Functional Guidelines for Organic Superfund Methods Data Review*,” EPA-540-R-20-005 (Ref. 59). Inorganic data will be validated at the Stage 4 (EPA Region 3 designation IM2) level in accordance with EPA Contract Laboratory Program “*National Functional Guidelines for Inorganic Superfund Methods Data Review*,” EPA 542-R-20-006 (Ref. 60).

The analytical data for samples collected from background locations will be used to establish analyte concentrations for comparison with Study Area-related samples. For each analyte in the background sample, the highest concentration will be multiplied by three (3), and, to determine if the analyte concentration meets observed contamination criteria, the resulting product will be compared to Study Area-related samples. The criteria used to determine an observed release, or observed contamination, based on chemical analysis are established based on:

- The sample measurement must be greater than or equal to the adjusted Contract Required Quantitation Limit (CRQL), with the CRQL adjusted to account for dilutions, differing sample volumes, and moisture content for soil.
- If the background concentration for the analyte is less than the adjusted CRQL, an observed release or observed contamination is established when the sample measurement is greater than, or equal to, the background adjusted CRQL.
- If the background concentration is greater than, or equal to, its adjusted CRQL, an observed release is established when the sample measurement is at least three (3) times the background concentration.
- The constituent in question must be at least partially attributable to the Eric Coke Plant Area.

To determine if applicable benchmarks are exceeded, the analytical data will also be evaluated against screening benchmarks.

Table 8 summarizes the soil screening benchmarks to be compared to soil sample results.

Table 8. Benchmark Comparison Table – Soil

Matrix	Screening Level 1	Screening Level 2	Screening Level 3	Screening Level 4
Surface Soil	RSL Residential Soil ¹	RSL Industrial Soil ¹	Lowest of the EPA Ecological Soil Screening Level (Eco-SSL) ²	Region 4 Soil Screening Value ³

Notes:

1. U.S. Environmental Protection Agency (EPA) Regional Screening Level (RSL) for Residential Soil, Industrial Soil, and Tapwater at target cancer risk of 1×10^{-6} and an individual non-carcinogen target hazard quotient (THQ) = 0.1 (Ref. 61).
2. The EPA Ecological Soil Screening Level Eco-SSL values will be calculated in accordance with EPA *Guidance for Developing Ecological Soil Screening Levels* revised February 2005 (Ref. 62) and EPA *Interim Ecological Soil Screening Level Documents* (<https://www.epa.gov/chemical-research/interim-ecological-soil-screening-level-documents>). If there is no Eco-SSL value, the Region 4 Ecological Soil Screening Values for Hazardous Waste Sites value will be utilized.
3. [EPA Region 4 Ecological Risk Assessment Supplemental Guidance, March 2018](#) (Ref. 63)

Table 9.
Comparison of Soil Benchmarks and Low Soil Quantitation Limits
Organic Compounds

COMPOUND	CAS	CLP CRQL (µg/kg)	EPA RSL (residential) (mg/kg)	EPA RSL (industrial) (mg/kg)	Lowest EPA Eco-SSL (µg/kg) ¹	R4 Soil Screening Value ¹ (µg/kg)
<i>Semi-Volatile Organic Compounds</i>						
1,1'-Biphenyl	92-52-4	170	5	20	NA	200
1,2,4,5-Tetrachlorobenzene	95-94-3	170	0.230	4	NA	180
1,4-Dioxane	123-91-1	67	5	24	NA	NA
1-Methylnaphthalene	90-12-0	170	18	73	NA	See Total ^a
2,2'-Oxybis(1-chloropropane)	108-60-1	330	310	4,700	NA	NA
2,3,4,6-Tetrachlorophenol	58-90-2	170	190	2,500	NA	40
2,4,5-Trichlorophenol	95-95-4	170	630	8,200	NA	4,000
2,4,6-Trichlorophenol	88-06-2	170	NA	NA	NA	NA
2,4-Dichlorophenol	120-83-2	170	19	250	NA	50
2,4-Dimethylphenol	105-67-9	170	130	1,600	NA	40
2,4-Dinitrophenol	51-28-5	330	13	160	NA	61
2,4-Dinitrotoluene	121-14-2	170	2	7	NA	6,000
2,6-Dinitrotoluene	606-20-2	170	0.36	2	NA	4,000
2-Chloronaphthalene	91-58-7	170	480	6,000	NA	NA
2-Chlorophenol	95-57-8	170	39	580	NA	60
2-Methylnaphthalene	91-57-6	170	24	300	NA	See Total ^a
2-Methylphenol	95-48-7	330	320	4,100	NA	100
2-Nitroaniline	88-74-4	170	63	800	NA	20
2-Nitrophenol	88-75-5	170	NA	NA	NA	NA
3,3'-Dichlorobenzidine	91-94-1	330	1.20	5	NA	30
3-Methylphenol	108-39-4	--	320	4,100	NA	90
3-Nitroaniline	99-09-2	330	NA	NA	NA	NA
4,6-Dinitro-2-methylphenol	534-52-1	330	0.51	7	NA	NA
4-Bromophenyl-phenylether	101-55-3	170	NA	NA	NA	NA
4-Chloro-3-methylphenol	59-50-7	170	630	8,200	NA	NA
4-Chloroaniline	106-47-8	330	3	11	NA	1,000
4-Chlorophenyl-phenyl ether	7005-72-3	170	NA	NA	NA	NA
4-Methylphenol	106-44-5	330	130	1,600	NA	80
4-Nitroaniline	100-01-6	330	25	110	NA	NA
4-Nitrophenol	100-02-7	330	NA	NA	NA	5,120
Acenaphthene	83-32-9	170	360	4,500	NA	See Total ^a
Acenaphthylene	208-96-8	170	NA	NA	NA	See Total ^a
Acetophenone	98-86-2	330	780	12,000	NA	NA

Table 9.
Comparison of Soil Benchmarks and Low Soil Quantitation Limits
Organic Compounds

COMPOUND	CAS	CLP CRQL (µg/kg)	EPA RSL (residential) (mg/kg)	EPA RSL (industrial) (mg/kg)	Lowest EPA Eco-SSL (µg/kg) ¹	R4 Soil Screening Value ¹ (µg/kg)
Anthracene	120-12-7	170	1,800	23,000	NA	See Total ^a
Atrazine	1912-24-9	330	2	10	NA	0.05
Benzaldehyde	100-52-7	330	170	820	NA	NA
Benzo(a)anthracene	56-55-3	170	1.1	21	NA	See Total ^b
Benzo(a)pyrene	50-32-8	170	0.11	2	NA	See Total ^b
Benzo(b)fluoranthene	205-99-2	170	1.10	21	NA	See Total ^b
Benzo(g,h,i)perylene	191-24-2	170	NA	NA	NA	See Total ^b
Benzo(k)fluoranthene	207-08-9	170	11	210	NA	See Total ^b
Bis(2-chloroethoxy)methane	111-91-1	170	19	250	NA	NA
Bis(2-chloroethyl) ether	111-44-4	330	0.23	1.0	NA	NA
Bis(2-ethylhexyl)phthalate	117-81-7	170	39	160	NA	20
Butylbenzylphthalate	85-68-7	170	290	1,200	NA	590
Caprolactam	105-60-2	330	3,100	40,000	NA	NA
Carbazole	86-74-8	330	NA	NA	NA	70
Chrysene	218-01-9	170	110	2,100	NA	See Total ^b
Dibenzo(a,h)anthracene	53-70-3	170	0.11	2	NA	See Total ^b
Dibenzofuran	132-64-9	170	8	120	NA	150
Diethylphthalate	84-66-2	170	5,100	66,000	NA	250
Dimethylphthalate	131-11-3	170	NA	NA	NA	350
Di-n-butylphthalate	84-74-2	170	630	8,200	NA	11
Di-n-octylphthalate	117-84-0	330	63	820	NA	910
Fluoranthene	206-44-0	170	240	3,000	NA	See Total ^b
Fluorene	86-73-7	170	240	3,000	NA	See Total ^a
Hexachlorobenzene	118-74-1	170	0.08	1.0	NA	79
Hexachlorobutadiene	87-68-3	170	1.2	5	NA	9
Hexachlorocyclo-pentadiene	77-47-4	330	0.18	0.8	NA	1
Hexachloroethane	67-72-1	170	2	8	NA	24
Indeno(1,2,3-cd)pyrene	193-39-5	170	1.1	21	NA	See Total ^b
Isophorone	78-59-1	170	570	2,400	NA	NA
Naphthalene	91-20-3	170	2	9	NA	See Total ^a
Nitrobenzene	98-95-3	170	5	22	NA	2,200
N-Nitroso-di-n propylamine	621-64-7	170	0.078	0.330	NA	NA
N-Nitrosodiphenylamine	86-30-6	170	110	470	NA	545
Pentachlorophenol	87-86-5	330	1.0	4	NA	2,100

Table 9.
Comparison of Soil Benchmarks and Low Soil Quantitation Limits
Organic Compounds

COMPOUND	CAS	CLP CRQL (µg/kg)	EPA RSL (residential) (mg/kg)	EPA RSL (industrial) (mg/kg)	Lowest EPA Eco-SSL (µg/kg) ¹	R4 Soil Screening Value ¹ (µg/kg)
Phenanthrene	85-01-8	170	NA	NA	NA	NA
Phenol	108-95-2	330	1,900	25,000	NA	790
Pyrene	129-00-0	170	180	2,300	NA	See Total ^b
<i>PAH by SIM</i>						
1,4-Dioxane	123-91-1	6.7 ^F	5.3	24	NA	NA
1-Methylnaphthalene	90-12-0	3.3	18	73	NA	See Total ^a
2-Methylnaphthalene	91-57-6	3.3	24	300	NA	See Total ^a
Acenaphthene	83-32-9	3.3	360	4,500	NA	See Total ^a
Acenaphthylene	208-96-8	3.3	NA	NA	NA	See Total ^a
Anthracene	120-12-7	3.3	1,800	23,000	NA	See Total ^a
Benzo(a)anthracene	56-55-3	3.3	1.1	21	NA	See Total ^b
Benzo(a)pyrene	50-32-8	3.3	0.11	2.1	NA	See Total ^b
Benzo(b)fluoranthene	205-99-2	3.3	1.1	21	NA	See Total ^b
Benzo(g,h,i)perylene	191-24-2	3.3	NA	NA	NA	See Total ^b
Benzo(k)fluoranthene	207-08-9	3.3	11	210	NA	See Total ^b
Chrysene	218-01-9	3.3	110	2,100	NA	See Total ^b
Dibenzo(a,h)anthracene	53-70-3	3.3	0.11	2.1	NA	See Total ^b
Fluoranthene	206-44-0	3.3	240	3,000	NA	See Total ^b
Fluorene	86-73-7	3.3	240	3,000	NA	See Total ^a
Indeno(1,2,3-cd)pyrene	193-39-5	3.3	1.1	21	NA	See Total ^b
Naphthalene	91-20-3	3.3	2.0	9	NA	See Total ^a
Pentachlorophenol	87-86-5	6.7	1.0	4	NA	2.1
Phenanthrene	85-01-8	3.3	NA	NA	NA	See Total ^a
Pyrene	129-00-0	3.3	180	2,300	NA	See Total ^b

Notes:

¹The soil concentrations will be compared to the EPA Ecological Soil Screening Level Eco-SSL values which will be calculated in accordance with EPA *Guidance for Developing Ecological Soil Screening Levels* revised February 2005 (Ref. 62) and EPA Interim *Ecological Soil Screening Level Documents* (<https://www.epa.gov/chemical-research/interim-ecological-soil-screening-level-documents>). If there is no Eco-SSL value, the Region 4 Ecological Soil Screening Values for Hazardous Waste Sites value will be utilized.

^a Individual concentrations for these low molecular weight PAH are not available. A total concentration for these low molecular weight PAH is available (29 mg/kg).

^b Individual concentrations for these high molecular weight PAH are not available. The total concentration for these high molecular weight PAH is available (1.1 mg/kg).

mg/kg	Milligram per kilogram	NA	Not Available
µg/kg	Micrograms per kilogram	PAH	Polycyclic aromatic hydrocarbon
CAS	Chemical Abstract Service	RSL	Risk Screening Level
CLP	Contract Laboratory Program	SIM	Selected-Ion Monitoring
CRQL	Contract Required Quantitation Limit		

Table 10.
Comparison of Soil Benchmarks and Low Soil Quantitation Limits
Inorganic Compounds

COMPOUND	CAS	CLP CRQL (µg/kg)	EPA RSL (residential) (mg/kg)	EPA RSL (industrial) (mg/kg)	Lowest EPA Eco-SSL (µg/kg) ¹	R4 Soil Screening Value ¹ (mg/kg)
<i>Inorganics</i>						
Aluminum	7429-90-5	20	7,700	110,000	NA	NA
Antimony	7440-36-0	6.0	3	47	0	0.27
Arsenic	7440-38-2	1.0	0.68	3	18	18
Barium	7440-39-3	20.0	1,500	22,000	330	330
Beryllium	7440-41-7	0.50	16	230	21	2.5
Cadmium	7440-43-9	0.50	1	10	0.36	0.36
Calcium	7440-70-2	500	NA	NA	NA	NA
Chromium	7440-47-3	1.0	NA	NA	NA	23
Cobalt	7440-48-4	5.0	2	35	NA	13
Copper	7440-50-8	2.5	310	4,700	NA	28
Iron	7439-89-6	10	5,500	82,000	NA	NA
Lead	7439-92-1	1.0	100	800	11	11
Magnesium	7439-95-4	500	NA	NA	NA	NA
Manganese	7439-96-5	1.5	5,500	82,000	220	220
Nickel	7440-02-0	4.0	150	2,200	38	38
Potassium	7440-09-7	500	NA	NA	NA	NA
Selenium	7782-49-2	3.5	39	580	0.52	0.52
Silver	7440-22-4	1.0	39	580	4.2	4.2
Sodium	7440-23-5	500	NA	NA	NA	NA
Thallium	7440-28-0	2.5	0.078	1	NA	0.05
Vanadium	7440-62-2	5.0	39	580	7.8	7.8
Zinc	7440-66-6	6.0	2,300	35,000	46	Ref.
Mercury	7439-97-6	0.1	1.1	5	NA	0.013
Cyanide	57-12-5	0.5	2.3	15	NA	0.1
Hexavalent Chromium	18540-29-9	--	0.30	6	NA	0.34

Notes:

¹The soil concentrations will be compared to the EPA Ecological Soil Screening Level Eco-SSL values which will be calculated in accordance with EPA *Guidance for Developing Ecological Soil Screening Levels* revised February 2005 (Ref. 62) and EPA Interim *Ecological Soil Screening Level Documents* (<https://www.epa.gov/chemical-research/interim-ecological-soil-screening-level-documents>). If there is no Eco-SSL value, the Region 4 Ecological Soil Screening Values for Hazardous Waste Sites value will be utilized.

^a Individual concentrations for these low molecular weight polycyclic aromatic hydrocarbons are not available. A total concentration for these low molecular weight polycyclic aromatic hydrocarbons is available (29 mg/kg).

^b Individual concentrations for these high molecular weight polycyclic aromatic hydrocarbons are not available. The total concentration for these high molecular weight polycyclic aromatic hydrocarbons is available (1.1 mg/kg).

mg/kg	Milligram per kilogram	NA	Not Available
µg/kg	Micrograms per kilogram	PAH	Polycyclic aromatic hydrocarbon
CAS	Chemical Abstract Service	RSL	Risk Screening Level
CLP	Contract Laboratory Program	SIM	Selected-Ion Monitoring
CRQL	Contract Required Quantitation Limit		

11.0 DATA REPORTING AND PROPOSED SCHEDULE

Field sampling for the SI will be conducted in summer 2024, depending on obtaining property access. Receipt of unvalidated analytical data will be requested at a TAT of 21 days from the laboratory. Validated analytical data will be requested with a TAT of 45 days. Data validation will be conducted by the EPA Region 3 ESAT.

An SI report will be submitted within one month following the receipt of the validated analytical results. Tetra Tech will finalize the ESI report following receipt of comments from EPA.

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Attachment 1
Toxic Release Inventory

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Envirofacts Report

Print Report

Query executed on SEP-25-2023
Results are based on data extracted on SEP-06-2023

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	ERIE COKE CORP	Mailing Name:	ERIE COKE CORP		
Address: <-https://epa.gov/enviro.epa.gov/facts/tri/search_useguide.html#address>	925 EAST BAY DRIVE ERIE PA 16507	Mailing Address: <-https://epa.gov/enviro.epa.gov/facts/tri/search_useguide.html#mail_address>	P.O. BOX 6180ERIE PA 16512		
County:	ERIE	Region:	3		
Facility Information:	View Facility Information	TRI ID:	16512RCKCRFOOTO	DUNS Number:	188607683
		FRS ID <-https://epa.gov/enviro.epa.gov/html/registry_id.html>	110043970441		
Latitude:	42.14562	Longitude:	-80.06924		
Public Contact:	STEVEN T. MCCORMICK	Phone:	814540177		
Assigned Public Contact:	STEVEN T. MCCORMICK				
Parent Company:	No US Parent	Standardized Parent Company:	NA	Parent DUNS:	
BIA Tribal Code:		Tribal:			

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 2018

NAICS CODE	PRIMARY	NAICS DESCRIPTION <-https://epa.gov/enviro.epa.gov/html/ri/naics_code_description/code_description.html>
324199	YES	All Other Petroleum and Coal Products Manufacturing

The above information comes from 2018, which was the last year NAICS code data was reported for this facility. The earliest NAICS code data on file for this facility was reported in 1987.

Industry Code for 2018

INDUSTRY CODE	INDUSTRY DESCRIPTION
324	Petroleum

Map this facility

Map this facility using one of Envirofact's mapping utilities.

Besides TRI, this facility also does the following:

- handles hazardous waste
- has permits to discharge to water
- has reported air releases under the Clean Air Act

More information about these additional regulatory aspects of this facility can be found by pressing the other regulatory data button below.

[Other Regulatory Data](#)

Total Aggregate Releases of TRI Chemicals to the Environment:

For all releases estimated as a range, the mid-point of the range was used in these calculations. This table summarizes the releases reported by the facility. NR - signifies nothing reported by this facility for the corresponding medium.

Total Aggregate Releases of TRI Chemicals excluding Dioxin and Dioxin-like Compounds
(Measured in Pounds)

Media	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989	1988	1987		
Air Emissions	14416.6	14592.4	13776.6	24104.2	7633.2	11844.4	10954.2	23373.62	21134.12	4449.42	6497.9	6388.18	5989.54	6534.03	6733.27	5461.79	4202.19	3679.3753	3858	280	270	200	200	200	200	200	235	5600	16240	27600	NR	2600		
Surface Water Discharges	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Releases to Land	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Underground Injection	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Total On-Site Releases	14416.6	14592.4	13776.6	24104.2	7633.2	11844.4	10954.2	23373.62	21134.12	4449.42	6497.9	6388.18	5989.54	6534.03	6733.27	5461.79	4202.19	3679.3753	3858	280	270	200	200	200	200	200	200	235	5600	16240	27600	NR	2600	
Transfer Off-Site to Disposal	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Total Releases	14416.6	14592.4	13776.6	24104.2	7633.2	11844.4	10954.2	23373.62	21134.12	4449.42	6497.9	6388.18	5989.54	6534.03	6733.27	5461.79	4202.19	3679.3753	3858	280	270	200	200	200	200	200	200	235	5600	16240	27600	NR	2600	

	2019 (Projected)	Pounds	0	0	0	0	67783	0	67783
	2020 (Projected)	Pounds	0	0	0	0	67783	0	67783
Naphthalene	2017	Pounds	0	0	0	0	10397	9	10406
	2018	Pounds	0	0	0	0	149119	84	149203
	2019 (Projected)	Pounds	0	0	0	0	149119	84	149203
	2020 (Projected)	Pounds	0	0	0	0	149119	84	149203
Phenanthrene	2017	Pounds	0	0	0	0	3	0	3
	2018	Pounds	0	0	0	0	211	0	211
	2019 (Projected)	Pounds	0	0	0	0	211	0	211
	2020 (Projected)	Pounds	0	0	0	0	211	0	211
Polycyclic aromatic compounds	2017	Pounds	0	0	0	0	49	0	49
	2018	Pounds	0	0	0	0	1789	0	1789
	2019 (Projected)	Pounds	0	0	0	0	1789	0	1789
	2020 (Projected)	Pounds	0	0	0	0	1789	0	1789
Propylene	2017	Pounds	0	0	0	0	69059	0	69059
	2018	Pounds	0	0	0	0	83880	0	83880
	2019 (Projected)	Pounds	0	0	0	0	83880	0	83880
	2020 (Projected)	Pounds	0	0	0	0	83880	0	83880
Toluene	2017	Pounds	0	0	0	0	27522	0	27522
	2018	Pounds	0	0	0	0	27364	0	27364
	2019 (Projected)	Pounds	0	0	0	0	27364	0	27364
	2020 (Projected)	Pounds	0	0	0	0	27364	0	27364
Xylene (mixed isomers)	2017	Pounds	0	0	0	0	61578	0	61578
	2018	Pounds	0	0	0	0	61558	0	61558
	2019 (Projected)	Pounds	0	0	0	0	61558	0	61558
	2020 (Projected)	Pounds	0	0	0	0	61558	0	61558

Publicly Owned Treatment Works (POTW) that Chemicals were Transferred to in 2011 and after:

In reporting year 2011, TRI changed its reporting requirements such that facilities were required to report the quantities transferred to individual POTWs. Prior to reporting year 2011, TRI only required facilities to report a total for all transfers of a chemical to one or more POTWs. Listed below are chemical, reporting year, unit of measure, total amount transferred and the name and address of the POTW. For all releases estimated as a range, the mid-point of the range with Total Transfer Amount equal to "0" were not listed.

Chemical Name	Year	Unit Of Measure	Total Transfer Amount	POTW Name and Address
Ammonia	2015	Pounds	456	CITY OF ERIE, PA - WASTEWATER TREATMENT PLANT 68 PORT ACCESS ROAD ERIE, PA 165072204
Ammonia	2016	Pounds	2878	CITY OF ERIE, PA - WASTEWATER TREATMENT PLANT 68 PORT ACCESS ROAD ERIE, PA 165072204
Ammonia	2017	Pounds	3972	CITY OF ERIE, PA - WASTEWATER TREATMENT PLANT 68 PORT ACCESS ROAD ERIE, PA 165072204
Ammonia	2018	Pounds	25966	CITY OF ERIE, PA - WASTEWATER TREATMENT PLANT 68 PORT ACCESS ROAD ERIE, PA 165072204
Cresol (mixed isomers)	2018	Pounds	750	CITY OF ERIE, PA - WASTEWATER TREATMENT PLANT 68 PORT ACCESS ROAD ERIE, PA 165072204
Naphthalene	2011	Pounds	11.6	CITY OF ERIE SEWER DEPARTMENT 68 PORT ACCESS ROAD ERIE, PA 165072202
Naphthalene	2012	Pounds	11.8	CITY OF ERIE, PA - WASTEWATER TREATMENT PLANT 68 PORT ACCESS ROAD ERIE, PA 165072204
Naphthalene	2013	Pounds	9	CITY OF ERIE, PA - WASTEWATER TREATMENT PLANT 68 PORT ACCESS ROAD ERIE, PA 16507
Naphthalene	2014	Pounds	7.8	CITY OF ERIE, PA - WASTEWATER TREATMENT PLANT 68 PORT ACCESS ROAD ERIE, PA 16507

Publicly Owned Treatment Works (POTW) that Chemicals were Transferred to PRIOR to 2011:

Prior to reporting year 2011, TRI only required facilities to report a total for all transfers of a chemical to one or more POTWs. In cases where a facility transferred waste to more than one POTW, it was not possible to list the quantities transferred to the individual POTWs. Displayed below is the history of POTW transfers prior to 2011 showing the chemical, year and POTW Name and Address. For all releases estimated as a range, the mid-point of the range was used in Transfer Amount equal to "0" were not listed.

Chemical Name	Year	Unit Of Measure	Total Transfer Amount
Ammonia	1987	Pounds	500000
Benzene	1989	Pounds	890
Benzene	1990	Pounds	830
Naphthalene	1989	Pounds	930
Naphthalene	1990	Pounds	870
Phenol	1987	Pounds	20000
Phenol	1989	Pounds	9700
Toluene	1989	Pounds	160
Xylene (mixed isomers)	1989	Pounds	30

Chemical Name	Year	POTW Name and Address <http://enviro.epa.gov/facts/tri/search_userguide.html#potw_name>
Ammonia	1987	WASTE WATER TREATMENT PLANT 80 WAYNE ST. ERIE, PA 16507
Anthracene	2000	NA :
Anthracene	2001	NA :
Benzene	1989	WASTE WATER TREATMENT PLANT 80 WAYNE ST. ERIE, PA 16507
Benzene	1990	WASTEWATER TREATMENT PLANT 80 WAYNE STREET ERIE, PA 16507
Benzene	1990	NA :
Benzene	1991	NA :
Benzene	1996	NA :
Benzene	1998	NA :
Benzene	1999	NA :
Benzene	2000	NA :
Benzene	2001	NA :
Benzene	2002	NA :
Benzene	2003	NA :
Benzene	2004	NA :
Benzene	2005	NA :
Benzene	2006	NA :
Benzo[g,h,i]perylene	2000	NA :
Benzo[g,h,i]perylene	2001	NA :
Benzo[g,h,i]perylene	2002	NA :
Benzo[g,h,i]perylene	2003	NA :
Benzo[g,h,i]perylene	2004	NA :
Benzo[g,h,i]perylene	2005	NA :

Lead compounds	2004	NA
Lead compounds	2005	NA
Lead compounds	2006	NA
Naphthalene	1989	WASTE WATER TREATMENT PLANT 80 WAYNE ST. ERIE, PA 16507
Naphthalene	1990	WASTEWATER TREATMENT PLANT 80 WAYNE STREET ERIE, PA 16507
Naphthalene	1990	NA
Naphthalene	1991	NA
Naphthalene	1998	NA
Naphthalene	1999	NA
Naphthalene	2000	NA
Naphthalene	2001	NA
Naphthalene	2002	NA
Naphthalene	2003	NA
Naphthalene	2004	NA
Naphthalene	2005	NA
Naphthalene	2006	NA
Phenanthrene	1999	NA
Phenanthrene	2000	NA
Phenanthrene	2001	NA
Phenanthrene	2004	NA
Phenanthrene	2005	NA
Phenanthrene	2006	NA
Phenol	1987	WASTE WATER TREATMENT PLANT 80 WAYNE ST. ERIE, PA 16507
Phenol	1989	WASTE WATER TREATMENT PLANT 80 WAYNE ST. ERIE, PA 16507
Polycyclic aromatic compounds	1998	NA
Polycyclic aromatic compounds	1999	NA
Polycyclic aromatic compounds	2000	NA
Polycyclic aromatic compounds	2001	NA
Polycyclic aromatic compounds	2002	NA
Polycyclic aromatic compounds	2003	NA

Toluene	1989	WASTE WATER TREATMENT PLANT 80 WAYNE ST. ERIE, PA 16507
Xylene (mixed isomers)	1989	WASTE WATER TREATMENT PLANT 80 WAYNE ST. ERIE, PA 16507

Non Production Releases:

This report shows the quantities of the chemicals released to the environment by reporting year as a result of remedial actions, catastrophic events, or other one-time events not associated with production processes. Chemicals with zero release amounts are not shown.

Chemical Name	Reporting Year	Unit Of Measure	Release Quantity
Benzene	2015	Pounds	22
Ethylene	2015	Pounds	17
Hydrogen sulfide	2015	Pounds	10
Naphthalene	2015	Pounds	7
Propylene	2015	Pounds	4
Toluene	2015	Pounds	2

Additional Source Reduction and Pollution Prevention Data:

The P2 Report summarizes chemical-specific Pollution Prevention (P2) data for multiple years, including Newly Implemented Source Reduction Activities (Section 8.10) and Optional Pollution Prevention Information (Section 8.11). A "P2 Data" data entry indicates that P2 data was reported for that specific chemical and year. A NR signifies that no Pollution Prevention data was reported for that specific chemical and year.

View all P2 Information for this facility

Chemical Name	P2 Report <small><http://enviro.epa.gov/facts/nri/p2.html></small>	5-Year Waste Trend	2015	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991
			Anthracene	P2 Report	NA	P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	NR	NR	NR	NR	NR	NR
Benzene	P2 Report	NA	P2	P2	P2	P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	P2	P2	
Cresol (mixed isomers)	P2 Report	NA	P2	No P2	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Dibenzofuran	P2 Report	NA	P2	No P2	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Naphthalene	P2 Report	NA	P2	P2	P2	P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	P2	No P2	
Phenanthrene	P2 Report	NA	P2	P2	P2	P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	NR	NR	NR	
Phenol	P2 Report	NA	P2	No P2	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Polycyclic aromatic compounds	P2 Report	NA	P2	P2	P2	P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	No P2	NR	NR	
Toluene	P2 Report	NA	P2	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	

"P2" indicates that P2 activity codes and/or descriptions were provided for the chemical and year in question. "B" indicates barriers to P2 was reported. "No P2" indicates that a Form R was submitted but no P2 information was included. "NR" indicates that no Form R was submitted.

Additional links for TRI:

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- National Library of Medicine (NLM) TOXMAP <http://toxmap.nlm.nih.gov> **Site Name:** <http://www.epa.gov/epahome/ie/iepa.htm>
- The Environmental Defense Fund's (EDF) Chemical Scorecard has on-line environmental information regarding this facility's **Site Name:** <http://www.epa.gov/epahome/ie/iepa.htm> reported TRI releases.



Discover.

- Accessibility** <https://www.epa.gov/accessibility>
- Budget & Performance** <https://www.epa.gov/planning/budget>
- Contracting** <https://www.epa.gov/contracting>
- EPA www Web Snapshot** <https://www.epa.gov/home/wwwepagov-snapshots>
- Grants** <https://www.epa.gov/grants>
- No FEAR Act Data** <https://www.epa.gov/cr/whistleblower-protections-epa-and-how-they-relate-non-disclosure-agreements-signed-epa-employees>
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Follow.



Attachment 2
Environmental Justice Screening

EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

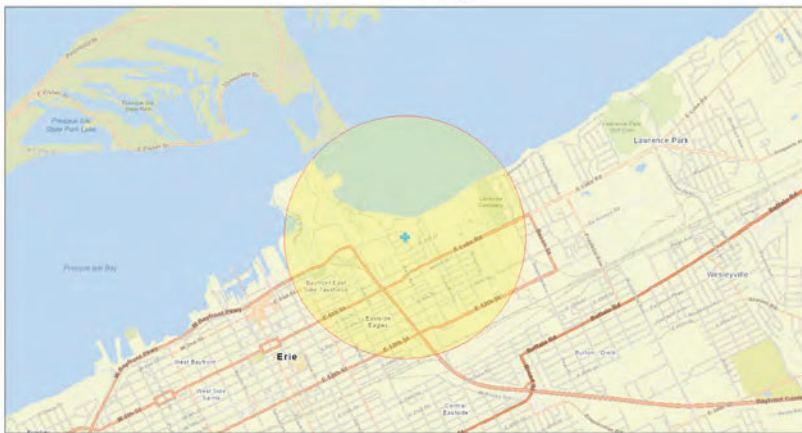
Erie, PA

1 mile Ring Centered at 42.142393,-80.063531

Population: 9,072

Area in square miles: 3.14

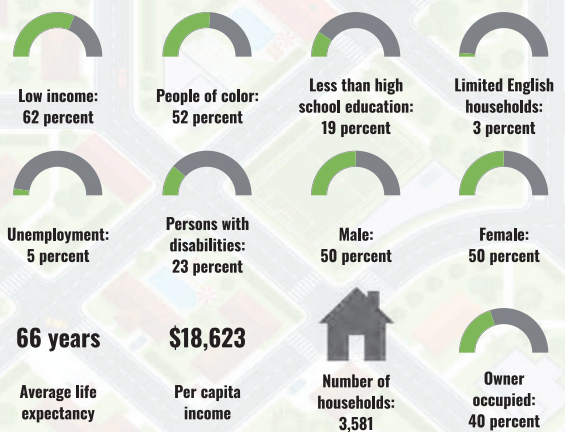
A3 Landscape



April 15, 2024
 Intersection of Queen and Pennsylvania Avenues, Erie, PA

Source of Data: GIS/MapInfo, Esri, Corvel, Esri, Sanborn, Geacis, Geoparc, GeoInformation, Inc, METRADA, USGS, EPA, US Census Bureau, USGS, USGS, USGS, USGS

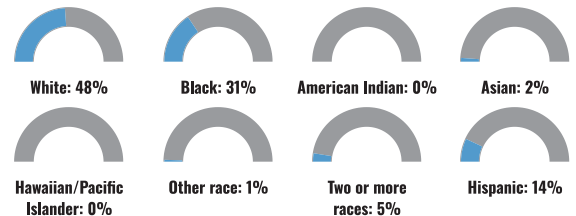
COMMUNITY INFORMATION



LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	85%
Spanish	9%
Russian, Polish, or Other Slavic	1%
Other Indo-European	2%
Arabic	1%
Other and Unspecified	2%
Total Non-English	15%

BREAKDOWN BY RACE



BREAKDOWN BY AGE



LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

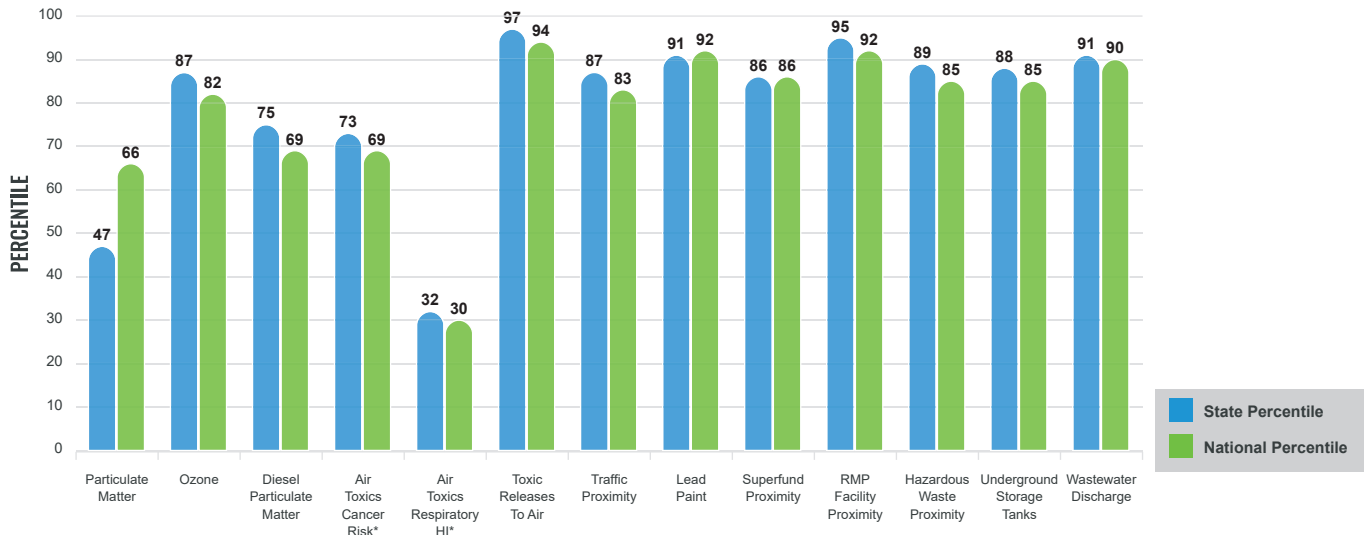
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

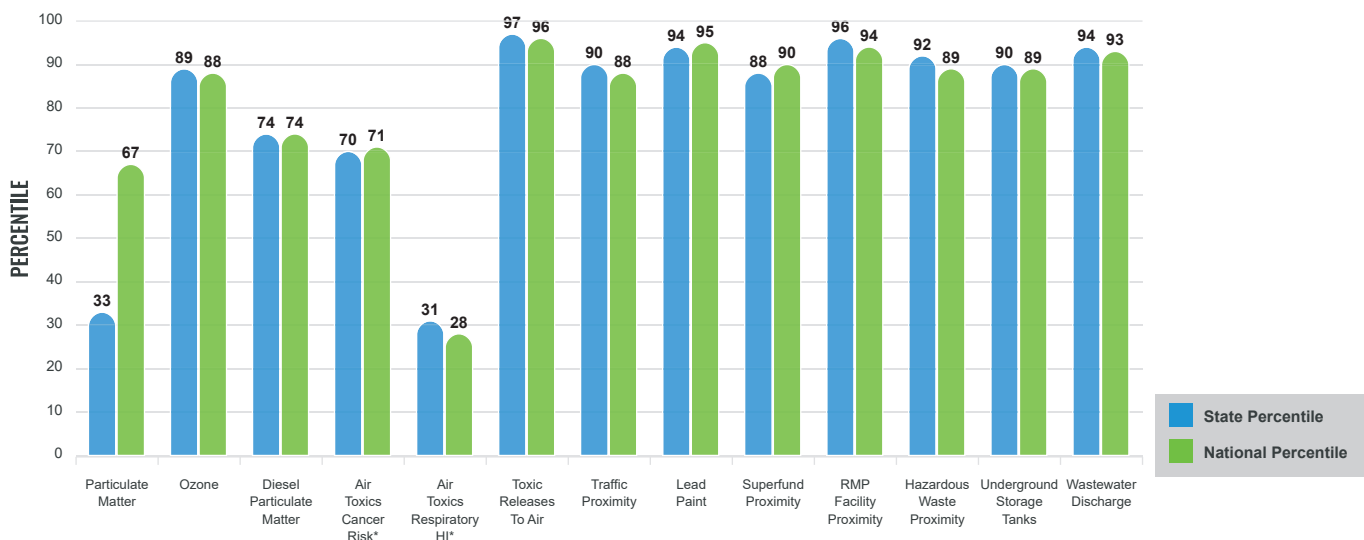
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for 1 mile Ring Centered at 42.142393,-80.063531

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter ($\mu\text{g}/\text{m}^3$)	7.63	8.65	13	8.08	35
Ozone (ppb)	62.9	61.6	64	61.6	62
Diesel Particulate Matter ($\mu\text{g}/\text{m}^3$)	0.185	0.233	36	0.261	41
Air Toxics Cancer Risk* (lifetime risk per million)	25	26	1	25	5
Air Toxics Respiratory HI*	0.2	0.28	1	0.31	4
Toxic Releases to Air	32,000	4,000	98	4,600	97
Traffic Proximity (daily traffic count/distance to road)	170	200	71	210	71
Lead Paint (% Pre-1960 Housing)	0.82	0.49	84	0.3	92
Superfund Proximity (site count/km distance)	0.11	0.18	58	0.13	71
RMP Facility Proximity (facility count/km distance)	1.6	0.45	95	0.43	94
Hazardous Waste Proximity (facility count/km distance)	1.9	1.4	75	1.9	72
Underground Storage Tanks (count/km ²)	4.2	3.6	71	3.9	74
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.16	1.7	84	22	84
SOCIOECONOMIC INDICATORS					
Demographic Index	57%	26%	88	35%	80
Supplemental Demographic Index	24%	13%	91	14%	87
People of Color	52%	24%	83	39%	67
Low Income	62%	28%	92	31%	90
Unemployment Rate	5%	6%	57	6%	57
Limited English Speaking Households	3%	2%	79	5%	67
Less Than High School Education	19%	9%	88	12%	79
Under Age 5	7%	5%	71	6%	67
Over Age 64	10%	19%	19	17%	27
Low Life Expectancy	29%	20%	98	20%	98

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	0
Water Dischargers	19
Air Pollution	8
Brownfields	2
Toxic Release Inventory	9

Other community features within defined area:

Schools	2
Hospitals	1
Places of Worship	0

Other environmental data:

Air Non-attainment	Yes
Impaired Waters	Yes

Selected location contains American Indian Reservation Lands*	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community	Yes
Selected location contains an EPA IRA disadvantaged community	Yes

Report for 1 mile Ring Centered at 42.142393,-80.063531

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	29%	20%	98	20%	98
Heart Disease	8.4	6.7	88	6.1	88
Asthma	12.8	10.3	91	10	95
Cancer	5.2	6.8	13	6.1	27
Persons with Disabilities	21.7%	14.5%	89	13.4%	90

CLIMATE INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	9%	11%	64	12%	63
Wildfire Risk	0%	0%	0	14%	0

CRITICAL SERVICE GAPS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	22%	14%	79	14%	78
Lack of Health Insurance	9%	6%	83	9%	61
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Report for 1 mile Ring Centered at 42.142393,-80.063531

Attachment 3

EPA. 2023. Field X-Ray Fluorescence Measurement. LSASDPROC-107-R6.

April 22.

Region 4
U.S. Environmental Protection Agency
Laboratory Services & Applied Science Division
Athens, Georgia

Operating Procedure

Title: Field X-Ray Fluorescence Measurement	ID: LSASDPROC-107-R6
Issuing Authority: Field Services Branch Supervisor	
Effective Date: April 22, 2023	Review Due Date: February 1, 2026
Method Reference: N/A	SOP Author: Kevin Simmons

Purpose

This document describes general and specific procedures, methods, and considerations to be used and observed when conducting field X-ray fluorescence (XRF) measurements of soil and sediment samples.

Scope/Application

The procedures contained in this document are to be used by field personnel when measuring metals concentrations in soil, sediment, or other solids in the field. On the occasion that LSASD field personnel determine that any of the procedures described in this procedure cannot be used to obtain metals analyses of the media being sampled, and that another method or XRF instrument must be used to obtain said measurements, the variant instrument and measurement procedure will be documented in the field logbook, along with a description of the circumstances requiring its use. While this SOP may be informative, it is not intended for and may not be directly applicable to operations in other organizations. Mention of trade names or commercial products in this operating procedure does not constitute endorsement or recommendation for use.

Note: LSB is currently migrating to a paperless laboratory. As a result, this SOP will allow for the creation of electronic tracking of standards and reagents in the LIMS to include stock material, intermediates and working material. Also permitted will be the use of electronic logbooks, checklists, and report forms as they are developed, which will also be housed in the LIMS and traceable to each sample and QC type within an analytical batch. LSB is committed to maintaining its quality system by continued traceability of reagents and standard material to NIST sources and the final reported results to the original samples as migration to an electronic system occurs.

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1. General Information

1.1. Documentation/Verification

1.1.1. This procedure was prepared by persons deemed technically competent by SESD management, based on their knowledge, skills and abilities and has been tested in practice and reviewed by a subject matter expert. The official copy of this procedure resides on the LSASD local area network (LAN). The Document Control Coordinator (DCC) is responsible for ensuring the most recent version of the procedure is placed on the LAN and for maintaining records of review conducted prior to its issuance.

2. General Precautions

2.1. Safety

2.1.1. Proper safety precautions must be observed when conducting field XRF measurements. Refer to the Region 4 Safety Manual and any pertinent site-specific Health and Safety Plans (HASPs) and/or Job Hazard Assessments (JHAs) for guidelines on safety precautions. It is recommended that users take the “Radiation Safety for Handheld XRF – X-Ray Tube” or other appropriate safety courses available on the Thermo Scientific™ website. These guidelines, however, should only be used to complement the judgment of an experienced professional. When using this procedure, minimize exposure to potential health hazards using protective clothing, eye wear and gloves. The operator should always be aware of the instrument’s orientation, the direction of its primary X-ray beam, when the primary beam is on or active, and the properties of the sample being analyzed. Address chemicals that pose specific toxicity or safety concerns and follow any other relevant requirements, as appropriate.

Number One Rule: The operator must **NEVER** aim the primary beam at themselves or others!

2.2. Procedural Precautions

2.2.1. All field XRF measurements pertinent to the sampling event are recorded in a bound field record logbook for the event. This record is created and maintained by the analyst providing the field XRF support. After the investigation is complete, the analyst will conduct post-processing of the field measurements and will enter final measurement data in the LSASD laboratory information management system and provide the LSASD project leader with a copy of the field measurement logbook. All other records and documentation of the investigation should be recorded according to the procedures outlined in the LSASD Operating Procedure for Logbooks (LSASDPROC-1002).

2.3. Limitations

2.3.1. There are three main sources of interference in XRF analysis that may impact data quality. They are sample preparation error, spectral interferences, and chemical matrix interferences.

- Preparation Error – The accuracy of the analysis is strongly impacted by sample homogenization. The more homogeneous the sample, typically analyzed by the cup method, the more accurate the results. There is no control of this limitation when conducting in situ analysis.
- Spectral Interference – Each element has a signature spectrum of energies and relative intensities. Many elements, however, produce X-rays of similar energy and discerning which element produced a detected X-ray is a factor of the detector's resolution capability and the software's ability to fit all of the data to the relative intensities produced by the various wavelengths.
- Chemical Matrix Interference – This refers to the effect that one element has on another in producing X-rays which reach the detector. Dominant elemental components of a sample, such as silicon in soils, vary in concentration from sample to sample and therefore so does that element's influence on the other elements in the sample.

2.3.2. There are several other limitations that the field investigator must be acutely aware of when conducting field analysis using XRF.

- Soil moisture – Excessive soil moisture biases the results low, i.e., the higher the soil moisture in a particular matrix, the lower the reported concentration relative to the actual concentration. This limitation may be overcome by drying the sample. Without sample drying, XRF measurement results for samples with typical soil moistures within the range of 15-25% are routinely reported at values less than laboratory confirmation analysis for the same samples. The actual difference may vary significantly for all samples from a site, but the XRF results reported by the instrument are typically on the order of 70-80% of the laboratory reported value for samples in this moisture range. This factor should be taken into consideration when making decisions based on XRF results.
- Lack of sensitivity with respect to certain analytes – Due to peak overlaps, some analytes may have problematically high detection limits, i.e., detection limits may be higher than project action levels for certain analytes, limiting its use for rapid field screening for certain elements. One of the most common examples of this phenomenon is the lead/arsenic analyte pair. When lead and arsenic are being analyzed, the peak overlap problem results in detection limits for arsenic that are several times higher than the typical action levels published for this analyte. It commonly is necessary to perform confirmatory

analysis in the laboratory to obtain analytical results for arsenic, or other analytes with high detection limits, to obtain data in the range necessary for making regulatory decisions.

2.4. Operational Checks and Quality Control

2.4.1. All XRF instruments shall be maintained and operated in accordance with the manufacturer's instructions, EPA Method 6200 and the LSASD Operating Procedure for Equipment Inventory and Management (LSASDPROC-1009). Prior to each operational period, the instrument is turned on and allowed to perform an internal calibration. Following this calibration, a performance check is conducted, using the appropriate National Institute of Standards and Technology (NIST)-traceable standard reference material for the analytes of concern, (i.e RCRApp 180-661). The value should be within +/- 20% of the stated value of the standard. Following this performance check, an instrument blank sample is analyzed to verify the instrument is not registering false positive results for the analytes of concern. After these checks, the instrument is ready for analysis.

2.4.2. The following operational and quality control requirements also apply to operation of the XRF instrument and should be followed and documented in the field logbook maintained by the analyst:

- During operations, the ambient air temperature will be recorded for each measurement and if the ambient temperature changes by more than 10°F, the instrument will be recalibrated.
- While the instrument is being used, the reference standards and the blank are run at the beginning of each workday, every 4 to 5 hours of analysis time, after the instrument has been off for 1 to 2 hours or if the battery has been changed, and also at the end of the period of operation, prior to turning the instrument off.
- For every twenty samples, or at least once per day, analyze a duplicate using the main sampling technique.
- Once per day, check the instrument's precision by analyzing one of the site samples at least seven times in replicate. This requirement should be done when possible, depending on field conditions and sample load.

2.4.3. EPA Method 6200 contains detailed instruction and guidance covering implementation of these procedures and any corrective actions that must be taken based on measured instrument behavior and performance. If at any time during a field investigation, it appears that the environmental conditions could jeopardize the quality of the measurement results, the measurements will be stopped. This will be documented in the field logbook.

2.4.4. In addition, the Region 4 Superfund X-Ray Fluorescence Field Operations Guide (XRF FOG), Most Recent Version, contains additional information, guidance, and QC procedures specific to analyzing soil samples by XRF.

3. Field X-Ray Fluorescence (XRF) Measurement Procedures

3.1. General

3.1.1. XRF is the property of a material to emit X-rays, with a characteristic energy, upon being irradiated by X-rays of a known source and energy. The emitted X-rays are detected by the particular XRF instrument as they impact a detector, which converts the energy of the emitted X-ray into electric current. The strength of the current is proportional to the energy of the X-ray. An onboard microprocessor counts how often an energy is detected, assigns the energy to a particular element and reports the calculated concentration for the element.

3.1.2. The XRF instrument available for use by LSASD field investigators is the Thermo Scientific™ Niton™ XL3t 955 Ultra Series Multi-element XRF Spectrum Analyzer. This instrument uses a miniaturized X-ray tube as its source rather than a radioactive isotope for X-ray generation for analysis.

3.2. Mode of Operation

3.2.1. The instrument is typically used in one of two modes, either for taking in situ measurements or ex situ (measuring sample material that has been placed in a cup or bag for analysis in an instrument tray). The following is a brief description of these modes of operation.

3.3. In Situ Measurement

3.3.1. Prior to taking the in-situ measurement, the measurement location is cleared of any significant vegetation, such as large clumps of grass, and is scuffed or otherwise leveled to provide a flat surface on which to place the instrument window. A piece of thin Mylar® film is then placed on the measurement location. This protects the instrument window, preventing it from becoming damaged or contaminated by the media being tested. After the window is pressed to the Mylar® film, the window is opened for a nominal (i.e., programmed) sixty seconds.

3.3.2. Because of the shallow penetration of the X-rays in typical soils, the measured concentrations are representative of the concentrations present at the very surface of the material being measured. If conditions representing concentrations over a greater depth are required by the study data quality objectives (i.e., on the order of three to six inches), the cup method, described in Section 3.4, must be used.

3.4. Collected Sample (Ex-Situ) Measurement

- 3.4.1. This method is used to measure concentrations of metals in soil and sediment samples collected from a vertical interval, either as a grab or a composite sample. Typically, soil or sediment samples are collected as if the samples were being collected for routine chemical analyses LSASD Operating Procedure for Soil Sampling (LSASDPROC-300) and the LSASD Operating Procedure for Sediment Sampling (LSASDPROC-200). After mixing, the media being sampled may be placed in either an 8-ounce glass container or a clean, unused zip-closure plastic bag (or equivalent). The XRF analyst then takes an aliquot from the container and places it in a small plastic cup with a Mylar[®] covering. The cup containing the sample is then loaded into a tray for analysis by the XRF instrument. Alternatively, if project objectives allow, measurements may be obtained by reading directly through the plastic bag. Window opening time considerations are the same as for the in-situ measurement procedures described in Section 3.3.
- 3.4.2. The concentrations reported for the samples analyzed by the cup method are representative of the interval sampled, i.e., if the sampler collected the sample from the interval of 0 to 3 inches below ground surface, the reported concentration, assuming thorough homogenization, will be an average of the concentrations over that interval.
- 3.4.3. The Region 4 Superfund X-Ray Fluorescence Field Operations Guide (XRF FOG), Most Recent Version, contains additional information, guidance, and QC procedures, including spreadsheets available from the Region 4 Scientific Support Section, specific to ex-situ soil analysis by XRF. This XRF FOG should be consulted in addition to this SOP when planning and conducting XRF analysis.

4. Study Design

4.1. General

- 4.1.1. XRF instruments are typically used for two main purposes. First it may be used to rapidly assess site conditions to support a site reconnaissance. Secondly, it may be used to screen large numbers of soil or sediment samples to minimize the number of samples that are sent to a laboratory to provide detailed site characterization data. These uses are summarized in the following sections.

4.2. Reconnaissance

- 4.2.1. XRF may be used to obtain in situ measurements at a large number of locations in a short period of time to determine if a site warrants further attention with respect to characterization. When used in concert with GPS, and when observing the limitations described in Section 2.3, XRF can reveal, where present, contamination patterns at a site which can form the basis for development of a more detailed study

to provide definitive data for site characterization. Conversely, the reconnaissance results may form the basis for a “no further action” decision, providing a very cost-effective tool for the decision maker.

4.3. Screening Support for Definitive Level Site Characterization

- 4.3.1. XRF may be used to supplement laboratory analyses to allow for the collection of large numbers of samples to provide a detailed characterization of a site. A high sample density grid or sampling pattern is created to provide adequate detail to meet the data quality objectives of the study or investigation. This sampling pattern may also involve the collection of significant numbers of subsurface soil samples to characterize any contamination present in the subsurface.
- 4.3.2. All samples, collected according to procedures found in LSASD Operating Procedure for Soil Sampling (LSASDPROC-300) and LSASD Operating Procedure for Sediment Sampling (LSASDPROC-200), are delivered to the XRF analyst on site. The analysis of these samples is conducted according to the method described in Section 3.4 of this procedure.
- 4.3.3. Based on the limiting factors described in Section 2.3, a confirmatory analytical scheme can be developed which minimizes the numbers of samples that must undergo laboratory analyses, yet provides definitive level data, with a high degree of confidence, to the project leader and other decision makers. Using the moisture limiting factor, there is usually a high degree of confidence that samples screened at concentrations less than 70-80% of the site action level will not exceed the action level. Of the samples that screen at or within 20-30% of the action level, most all, with a high degree of confidence, exceed the action level. If a reconnaissance is conducted prior to the full-scale site investigation, in addition to the in-situ analysis, it is advisable to collect and analyze a small subset of the screened locations to generate site-specific moisture limiting factors. This correlation factor can be used to develop a sampling scheme with more confidence.
- 4.3.4. Using these relationships, the following scheme may be implemented:
- Ten percent of the samples that screen at concentrations less than approximately 70-80% (or other correlation factor developed on actual data) of the site action levels are submitted for confirmation analyses to confirm that concentrations are, in fact, below the site action levels.
 - All of the samples that screen at concentrations of 70-80% (or other correlation factor developed on actual data) of the action level up to the action level value are submitted for confirmation analyses to confirm that concentrations are, in fact, equal to or greater than the site action levels.

- Ten percent of the samples that screen at concentrations exceeding the action levels are submitted for confirmation analyses to confirm that concentrations are, in fact, greater than the site action levels.

References

LSASD Operating Procedure for Equipment Inventory and Management, SESDPROC-108, Most Recent Version

LSASD Operating Procedure for Logbooks, LSASDPROC-1002, Most Recent Version

LSASD Operating Procedure for Sediment Sampling, LSASDPROC-200, Most Recent Version

LSASD Operating Procedure for Soil Sampling, LSASDPROC-300, Most Recent Version

United States Environmental Protection Agency (US EPA). Field Portable X-Ray Fluorescence Spectrometry for the Determination of Elemental Concentrations in Soil and Sediment, Method 6200, Revision 0, February 2007.

Quality System and Technical Procedures for LSASD Field Branches. US-EPA Region 4 Laboratory Services & Applied Science Division (LSASD), Athens, GA. Most Recent Versions.

US EPA. Region 4 Safety Manual. Region 4 LSASD, Athens, GA, Most Recent Version.

Region 4 Superfund X-Ray Fluorescence Field Operations Guide (XRF FOG), Most Recent Version.

Thermo Scientific™ Safety Training found at:

<https://www.thermofisher.com/us/en/home/industrial/spectroscopy-elemental-isotope-analysis/portable-analysis-material-id/xrf-radiation-safety-training.html>

Revision History

History	Effective Date
Replaced Chief with Supervisor; General formatting revisions.	April 22, 2023
<p>LSASDPROC-107-R5, Field X-Ray Fluorescence Measurement, replaces SESDPROC-107-R4</p> <p>General: Corrected any typographical, grammatical and/or editorial errors. SOP Title block and document formatted into the new SOP format. Throughout the document SESD was changed to LSASD. Left justified text to make document easier to read.</p>	February 2, 2022
<p>SESDPROC-107-R4, Field X-Ray Fluorescence Measurement, replaces SESDPROC-107-R3</p> <p>General: Corrected any typographical, grammatical and/or editorial errors. Throughout the document references were added to reference the Region 4 Superfund X-Ray Fluorescence Field Operations Guide (XRF FOG).</p> <p>Section 2: Omitted second bullet. Revised third bullet to up update the frequency that reference standards and blanks are run.</p> <p>Section 3.2: Added “or bag” to first sentence of paragraph.</p> <p>Section 3.2.2: Added “(Ex-Situ)” into Section title.</p>	September 8, 2017
SESDPROC-107-R3, Field X-Ray Fluorescence Measurement, replaces SESDPROC-107-R2	December 18, 2015
SESDPROC-107-R2, Field X-Ray Fluorescence Measurement, replaces SESDPROC-107-R1	December 20, 2011
SESDPROC-107-R1, Field X-Ray Fluorescence Measurement, replaces SESDPROC-107-R0	November 1, 2007
SESDPROC-107-R0, Field X-Ray Fluorescence, Original Issue	February 05, 2007

Note: SOP section references prior to the February 2, 2022, update are from the old SOP form.

Attachment 4

Hawaii Department of Health (HDOH).
2023. Technical Guidance Manual, Sections 3&4 Site Investigation Design and
Implementation: State of Hawaii, Department of Health, Office of Hazard
Evaluation and Emergency Response July 2023 (and updates), Honolulu, Hawaii,
USA.



TGM for the Implementation of the Hawai'i State Contingency Plan
Section 3.0
SITE INVESTIGATION DESIGN AND IMPLEMENTATION: OVERVIEW

SECTION 3

SITE INVESTIGATION DESIGN AND IMPLEMENTATION: OVERVIEW

Interim Final – July 2023

State of Hawai'i
Department of Health
Office of Hazard Evaluation and Emergency Response
2385 Waimano Home Rd #100
Pearl City, Hawai'i 96782

Interim Final – July 2023



TGM for the Implementation of the Hawai'i State Contingency Plan

Section 3 FOREWARD

Foreword to Sections 3 and 4 of the HEER Office Technical Guidance Manual

The guidance presented in Sections 3 and 4 of the Hawai'i Department of Health (HDOH), Hazard Evaluation and Emergency Response (HEER) Office represents the collective experience of a large group local, national and international environmental experts trained in Gy's Theory of Sampling. The guidance focuses on the use of "Decision Unit (DU)" and "Multi Increment® Sample" investigation methods for characterization of environmental media. (Multi Increment is a registered trademark of EnviroStat, Inc.). Although primarily focused on soil, the methods introduced are also applicable to the investigation of contaminated sediment and other particulate media. Concepts of Systematic Planning and the use of DUs to design risk-based sampling plans also apply to the investigation of contaminated groundwater and surface water (Section 6) as well as indoor air, outdoor air and subsurface vapors (Section 7). Compositional heterogeneity – key to understanding and addressing error in data for particulate matter, is of less concern for these media. Sample data error is instead primarily due to define and designate appropriate DUs and/or a failure to capture and represent distributional heterogeneity within the targeted DU volume of media.

Section 3 and Section 4 of this guidance replace Sections 3, 4 and 5 of the original (pre-2023) *Technical Guidance Manual* (TGM), with a separate "Section 5" no longer utilized. Copies of the original sections are available for download in the Archives folder of the HEER Office DU-MIS webpage.

The guidance is presented in three parts that reflect different audiences. Appendix A in Section 4 of the guidance provides brief Fact Sheet overviews of DU-MIS. The first fact sheet serves as an introduction to DU-MIS for the general as well as environmental professionals new to the subject. Section 3 of the guidance provides a basic but concise overview of the site investigation process. This section is intended for senior- and management-level staff and as an introduction for field workers. Included is an introductory review of the Theory of Sampling for particulate matter and an overview of the Systematic Planning process and the use of DU-MIS collection methods to rapidly and reliably characterize contaminated land. Section 4 of the guidance is a series of appendices that provide detailed discussions and examples of each aspect of the site investigation process as well as references for additional information. These sections are intended for those tasked with implementation of DU-MIS investigation methods in the field and laboratory as well as assessment of risk and design and implementation of remedial actions.

Reference: HDOH, 2023, *Technical Guidance Manual, Sections 3&4 Site Investigation Design and Implementation*: State of Hawai'i, Department of Health, July 2023 (and updates).

Comments and suggestions for future updates of the guidance are welcome and can be submitted to the HEER Office contact:

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TGM for the Implementation of the Hawai'i State Contingency Plan
Section 3
ABBREVIATIONS AND ACRONYMS

SECTION 3 ACRONYMS AND ABBREVIATIONS

°C	Degrees Celsius
cm	Centimeter
CSM	Conceptual Site Model
DNAPL	Dense, Non-Aqueous Liquids
DU	Decision Unit
HIDOH	Hawaii Department of Health
kg	Kilogram
m	Meter
m ²	Square Meter
m ³	Cubic Meter
MI	Multi Increment
MIS	Multi Increment Sample
mm	Millimeter
µm	Micrometer
Multi Increment®	Registered trademark of EnviroStat, Inc.
PCB	Polychlorinated Biphenyl
RSD	Relative Standard Deviation
UCL	Upper Confidence Level (UCL)
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds



TGM for the Implementation of the Hawai'i State Contingency Plan

Section 3.0

APPLICATION SCOPE

3.0 APPLICATION SCOPE

This standard applies to field sampling and laboratory sample preparation for investigations of contaminated soil. Although the methodologies and examples presented focus on soil, the general concepts and approaches are applicable to investigations of all forms of particulate matter, including sediment. The methods described likewise apply to all types of contaminants including non-volatile and volatile chemicals and surface as well as subsurface conditions.



TGM for the Implementation of the Hawai'i State Contingency Plan Section 3.1 TERMS AND DEFINITIONS

3.1 TERMS AND DEFINITIONS

3.1.1 RISK-BASED SITE INVESTIGATION

The investigation and collection of sample data in a manner that directly reflects and answers questions related to the assessment of risk or to the optimization of remedial activities designed to address identified or anticipated risks. “Decision Units” and “Multi Increment® Sample” collection methods are an important part of a risk-based site investigation. The term “Multi Increment” is a registered trademark of EnviroStat, Inc.

3.1.2 SITE INVESTIGATION SYSTEMATIC PLANNING

The step-by-step process of compiling background information and developing a site conceptual model that is subsequently used to prepare a sampling and analysis plan and guide investigation efforts in the field.

3.1.3 CONCEPTUAL SITE MODEL (CSM)

A schematic or written summary of site conditions and risk to human health and the environment based on information compiled during the Systematic Planning process and updated as additional site data are collected.

3.1.4 DECISION UNIT

An area and volume of soil or sediment about which a decision regarding risk and/or remediation is to be made based on sample results.

3.1.5 SOURCE AREA DU

Refers to a specific area of known or suspected contaminated soil or sediment presumed to pose a significant risk to human health and the environment. Source areas are normally identified and tested separately during a site investigation to optimize remediation efforts.

3.1.6 BOUNDARY AREA DU

Refers to a peripheral and anticipated clean area of soil or sediment immediately adjacent to a known or suspected source area and is intended to confirm the lateral and/or vertical extent of the contamination.

3.1.7 EXPOSURE AREA DU

A specific area frequented by human or ecological receptors that is tested and used to quantitatively assess risk. Risk is quantified based on the mean concentration of the contaminant within the entire exposure area.

3.1.8 HETEROGENEITY

The variability of contaminant distribution and concentrations between individual particles of soil (“compositional heterogeneity”) and in the distribution of the contaminant within the DU area and volume of soil or sediment as a whole (“distributional heterogeneity”).

3.1.9 GY’S SAMPLING THEORY



Statistical-based theory of the collection of samples of heterogeneous, particulate matter such as soil or sediment developed by Pierre Gy. Gy's sampling theory includes strict requirements for the collection, processing and analysis of samples.

3.1.10 INCREMENT

Refers to single masses of soil or sediment collected within a DU that are combined to prepare a Multi Increment Sample.

3.1.11 MULTI INCREMENT SAMPLE®

Refers to a sample prepared by the collection and combination of multiple increments of soil from a single DU. A Multi Increment sample is required to have a minimum mass and must be processed in accordance with Gy's sampling theory to produce representative data. Multi Increment® is a registered trademark of EnviroStat, Inc. Investigations that strictly adhere to guidance presented in this document may and should use the term in associated reports.

3.1.12 DISCRETE SAMPLE

Refers to a sample collected from a single point within a targeted area with no requirements for minimum mass or thorough processing by a laboratory. A discrete (or "grab") sample can be thought of as a "single increment" sample. Discrete sample data are not reliable for delineation of contamination or assessment of risk.



3.2 SYSTEMATIC PLANNING PROCESS

The Systematic Planning process consists of nine sequential steps designed to ensure that a well-thought-out workplan is prepared prior to the actual collection of samples in the field (Figure 3-1): (1) Define the site investigation scope and establish a preliminary conceptual site model (CSM); (2) Identify known or suspect hazardous chemicals; (3) Determine data information needs; (4) Designate DUs; (5) Develop DU decision statements; (6) Develop and implement sampling and analysis plan; (7) Assess the quality of the data; (8) Determine potential environmental risk/hazards and (9) Revise CSM and propose recommendations for next

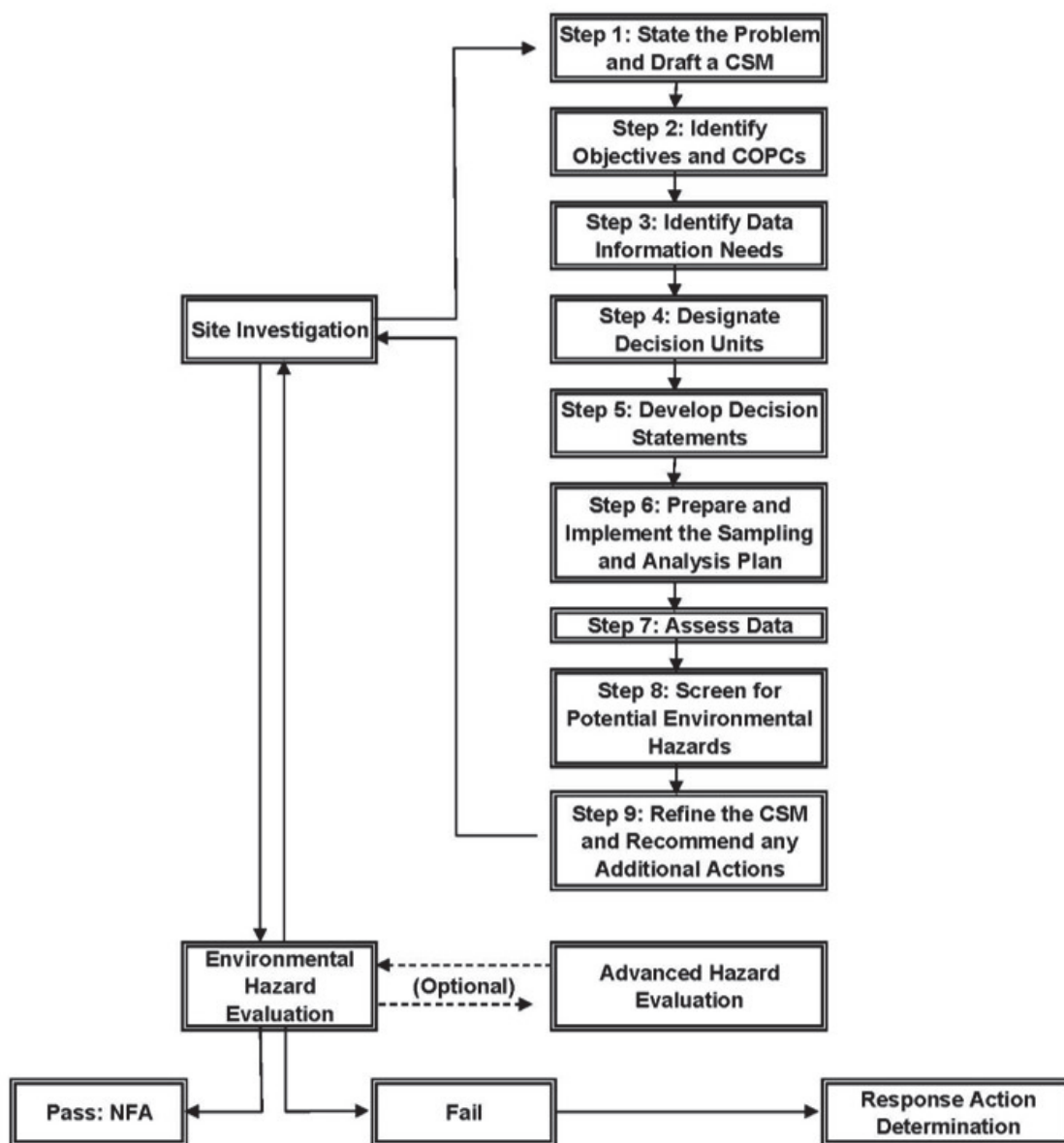


Figure 3-1. Nine-Step Systematic Planning Process



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steps.

3.2.1 STEP 1: DEFINE SITE INVESTIGATION SCOPE & ESTABLISH PRELIMINARY CONCEPTUAL SITE MODEL.

Review site history and available environmental data. Consult with past or current employees or other people familiar with operations at the site/facility. Review available information on past chemical use and known or potential releases. Consider preliminary screening of the site by collection of Multi Increment samples from a small number targeted DUs and use of field screening tools (e.g., portable XRF, PID, etc.) to check for COPCs if previously collected sample data are not available. Prepare a preliminary assessment of potential environmental concerns at the site with respect to the types of chemicals suspected to have been released and current or anticipated future site use, including possible contamination of both soil and groundwater. Use this information to prepare a preliminary, CSM of contaminated soil and groundwater-related environmental hazards. Additional guidance on the preparation of a CSM is provided in Appendix B.

3.2.2 STEP 2: IDENTIFY SITE INVESTIGATION OBJECTIVES AND CHEMICALS OF POTENTIAL CONCERN

Use the information generated in Step 1 to develop specific site investigation questions related to risk and/or the optimization of remediation. Example questions directly related to risk include:

- What are the specific contaminants of concerns at the site?
- Does long-term exposure to contaminants in soil pose a chronic health risk to site occupants or construction workers or to ecological receptors?
- Do vapor emissions caused by temporary exposure of heavily contaminated soil pose a short-term, acute health risk to workers or nearby residents?
- Do volatile chemicals in contaminated soil pose a risk of vapor intrusion into overlying buildings and adverse impacts to indoor air?
- Do contaminants in soil pose risk of leaching concern and contamination of drinking water resources or ecological, aquatic habitats?
- Do contaminants in soil pose a risk of fire, nuisance odors, sheens on water, fouling of construction equipment or other concerns during current or future site activities?

Example questions related to remediation include:

- What are the lateral and vertical boundaries of contamination above levels of potential concern?
- Where is the main mass of the contaminant located?
- What is the mass of the contaminant in soil targeted for *in situ* treatment?
- How is the contaminant mass partitioned between free product (nonaqueous-phase liquid), dissolution in groundwater and sorption to soil particles?

The latter set of questions are particularly important when the remediation goal is based on a targeted reduction in the mass of contaminant present (e.g., 80%) rather than cleanup to a concentration-based goal.



3.2.3 STEP 3: DETERMINE DATA INFORMATION NEEDS

Evaluate existing site data and determine if additional data or other information are needed. Data needs should be continuously re-evaluated and refined as more site information becomes available and potential hazards are identified.

For example, relatively immobile contaminants like lead, arsenic and organochlorine pesticides primarily pose direct-exposure concerns. Accurate assessment of risk might require additional testing of samples for parameters such as bioaccessibility. Nonvolatile, soluble contaminants like nickel salts and chlorinated herbicides can pose leaching problems and contamination of groundwater. This might require the collection of groundwater data. Volatile and soluble contaminants like petroleum hydrocarbons and chlorinated solvents can pose both leaching and vapor emission concerns. This might require the collection of soil vapor and if necessary indoor air data, if a significant vapor intrusion risk is identified (refer to TGM Section 7). Optimization of remediation can require a greater resolution of the lateral and vertical extent of high-concentration areas of contamination than might otherwise be necessary to simply assess risk.

Risk is always assessed based on the concentration of a contaminant for a designated exposure area and volume of soil as a whole. Sample collection must therefore be designed to directly provide the mean contamination concentration for a targeted DU area and volume of soil.

For example, “Does the true or “mean” concentration of lead for this 400 square meter (m^2) area of soil to a depth of 10 centimeters (cm) exceed the screening level for potential, direct exposure risk under current or future site conditions?” Note that all data for particulate matter represent a mean of the group of particles tested. Although retained for use in this document, use of the term “mean” is redundant and not strictly necessary. This question is addressed by the collection and testing of a representative sample from the designated area and volume of soil. The resulting data are then used to directly answer the investigation questions asked and determine the need for additional actions based on DU-specific “Decision Statement” formulated prior to the collection of samples.

3.2.4 STEP 4: DESIGNATE DECISION UNITS

Decision Unit areas and volumes of soil are designated for sample collection based on the site investigation questions. Examples of DU designation under different site scenarios are provided in Appendix C. Determine the location, size, shape and depth of Exposure Area and/or Source Area DUs based on the potential environmental hazards associated with target contaminants, the intended use of the site and anticipated remediation measures. Designate known or suspected contaminant source areas for individual testing in order to isolate the contamination and optimize remediation. These areas are generally set to tens of square meters to several hundred square meters in size. Designate one or more rings of Boundary DUs around the periphery of the suspected source area(s) to confirm the extent of contamination.

Divide the remainder of the site into Exposure Area DUs based on site usage for testing. If suspected source areas within the site are not identified, then consider dividing the entire site into Exposure Area DUs for testing. The locations and sizes of Exposure Area DUs are site-specific but are typically several hundred square meters in area.



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3.2.5 STEP 5: PREPARE DECISION STATEMENTS/JUDGEMENTS

Use the sampling information determined in Step 3 and the DUs defined in Step 4 to write a decision statement specifying the contaminants to be measured and the corresponding measures to be taken during the decision-making process.

Example wording for decision statements includes:

“If the concentration of [chemical substance] in the targeted DU based on [MI sample data value] and analyzed using [analytical method] exceeds [value], then [required action]. If not, then [next steps].”

Actions in cases where published action (screening) levels are exceeded could include removal of contamination above default action levels, designation of areas for capping and long-term management, or development of alternative action levels in a site-specific risk assessment.

It is important that fixed decision statements be assigned to each DU at the beginning of the project and before samples are collected. The decisions statements should be agreed upon by all stakeholders in the investigation, including risk assessors, remediation experts and the overseeing regulatory agency and should consider the time allotted for completion of the project and the budget. Decision statements should be strictly followed when the sample data are obtained.

Decisions Units should be ideally designated at the scale necessary for final decision making from the start. Subdivision of original DUs for resampling after data are obtained and determined to exceed screening levels should be avoided (refer to Fact Sheet #2 in Section 4, Appendix A). This will minimize delays for completion of the project and avoid unanticipated problems due to changes in original plans. Followup subdivision of a site into smaller DUs might be unavoidable in some cases, however. Examples include cases where the responsible party is only willing to initially fund an investigation that focuses on the use of relatively large, Exposure Area DUs to assess risk. If one or more DUs fail action levels, then a decision will be made to abandon the project or proceed with a more detailed investigation. Responsible parties should be made aware of potential project completion delays if this approach is followed and weigh the pros and cons.

3.2.6 STEP 6: DEVELOP AND IMPLEMENT SAMPLE COLLECTION AND ANALYSIS PLAN

Prepare a plan for the collection, processing and testing of samples from the designated DUs. A detailed discussion of the elements of a sample collection and analysis plan is provided in the following sections and in the appendices.

When formulating a sampling plan, consider the challenges that could occur during sample collection, including:

- Availability of to-scale, detailed maps;
- Availability of facilities for equipment staging, decontamination and sample storage;
- Need to clear area of debris and vegetation before sample collection;
- Existing structures and other hindrances to access of targeted sample collection areas;
- Ground surface conditions (e.g., pavement);



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- Topography;
- Subsurface debris, cobbles, boulders or bedrock that could inhibit drilling;
- Underground utilities;
- Overhead utilities;
- Depth to groundwater
- Types of tools required to collect surface and/or subsurface samples;
- Total number of samples to be collected;
- Anticipated total sample collection and analytical costs;
- Laboratory sensitivity/reporting limits and tolerable QA/QC levels; and
- Reasonable allocation of funds.

Multi Increment sample collection methods are required to obtain reliably representative data for a targeted DU. A detailed discussion of the scientific basis of MI sample collection methods is provided in Appendix D. The inherent error in past, “discrete,” “grab” or “composite” sampling methods is discussed in Appendix E. The collection of MI samples from surface and subsurface soil is discussed in Appendices F and G, respectively. Additional guidance on the collection of samples from excavations and stockpiles, samples to be tested for volatile chemicals and the collection of sediment samples is provided in Appendices H through J.

Consult with the laboratory prior to submitting the samples for analysis. Request a copy of the laboratory Standard Operation Procedure for processing and analysis of MI Sample and ensure that they have experience. Discuss quality assurance measures to be carried out by the laboratory to ensure the data are representative of the samples provided. Require the laboratory to include a brief but concise summary of sample processing methods in the report, including the mass of the sample received and the mass of the subsample tested.

3.2.7 STEP 7: ASSESS DATA QUALITY

Review final sample collection and testing methods for consistency with the workplan and requirements for the collection of representative sample data. Review laboratory analytical performance data to assess data quality control associated with subsample testing. Refer to field and laboratory replicate sample data to evaluate the overall data precision (see Section 3.8). Ensure that analytical sensitivity and error are within agreement of the decision statements. Discuss how to address “non detect” result when the Method Reporting Limit or Detection Limit is above the action (screening) level or if a result is very close to the action level but the replicate RSD is higher than desired.



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3.2.8 STEP 8: DETERMINE POTENTIAL ENVIRONMENTAL HAZARDS

After completing the data assessment, compare environmental data with environmental screening values or use the data to quantify risk in a risk assessment. Ensure that the risk assessment, also referred to as an Environmental Hazard Assessment, addresses all potential environmental concerns identified in Steps 1 through 3 of the planning process (refer to TGM Section 13 and HDOH 2017).

3.2.9 STEP 9: IMPROVE CSM AND PROPOSE NEXT ACTION PROPOSAL

Update the CSM based on the data collected and a more in-depth understanding of site conditions and potential environmental hazards. Use the revised CSM to identify any data gaps and determine the scope of work required to complete the site investigation. Prepare recommendations for additional actions when the investigation is determined to be complete and reliable.



3.3 DESIGNATION OF DECISION UNITS

The need for remediation of contamination is driven by the identification of a significant risk to human health or the environment. The risk is identified and assessed by designation of risk-based areas and volumes of soil for testing, referred to as “Decision Units” or “DUs.” The proper designation of DUs of soil, sediment or any other environmental media for testing is a critical step in the site investigation process. Refer to Sections 6 and 7 of the TGM for discussion of DU designation approaches for water and air.

Decision Units represent the physical resolution of the site investigation necessary to address questions related to risk and optimization of potential remedial actions. These questions are prepared as part of the initial CSM. Designation of well-thought-out DUs with clear decision statements on how sample data are to be used helps minimize the need for additional sample collection and will expedite overall project completion. Improper designation of DUs during the site investigation stage of a project can result in delayed completion of the site characterization, an inaccurate assessment of risk and inefficient remediation.

A DU can be thought of as the total volume and area of soil that would ideally be sent to the laboratory for testing as a single mass. For example, this might include all of the upper 10 cm of soil in a 5,000 m² playground for a total of 50 m³ of soil. In most cases, submittal of such a large mass of soil to a laboratory for extraction is not practical. As an alternative, a representative 1- to 2-kilogram (kg) sample of soil must be collected (Section 3.4). This sample is likely still too large for the laboratory to extract as a single mass and a second, representative subsample must be collected. As discussed in Appendix D, each step introduces error into the final data.

Most DUs are shaped like a thin table, with the length and width of the sides being far greater than the thickness. Such shapes require special attention to the sample collection method employed to represent the targeted area and volume of material. As discussed in Section 3.4, the sample must be collected by combining small masses of material from evenly spaced points throughout a DU. Testing of material from a single point or cluster of points will not generate reliable sample data for decision making.

Soil particle size is an important factor in the designation of DUs. As a default, the ≤ 2 millimeter (mm) fraction of material specifically defined as “soil” is normally targeted for testing (USEPA 1996). This is the fraction of soil assumed to contain the main mass of contaminants and pose the highest environmental risk and, for the purposes of site characterization, is the actual DU. Testing of coarser or finer particle sizes might be required on a site-specific basis. For example, risk assessors might require data for the very fine fraction of soil specifically anticipated to adhere to young children’s hands (e.g., <250 micrometer [μm] or <150 μm ; USEPA 2011, 2016). Larger particles, including cobbles and gravel as well as rock are not typically considered part of a DU and in general do not need to be tested beyond basic field screening (e.g., observance of stains, sheens when placed in water, odors, etc.). Consider the collection of soil gas samples to assess potential vapor intrusion or leaching risk and direct testing of groundwater for assessment of potential leaching risk.

Samples must be sieved to isolate the targeted particle size. Consider sieving in the field using a #10 sieve the soil is adequately dry or otherwise remove large particles by hand to reduce the mass shipped to the laboratory. If the initially designated DU does not contain soil within the targeted particle-size range, then no sample is collected. For example, if the <2 mm particle size is targeted but particles this small are not present in a stockpile of boulders then the DU of interest does not exist and no sample is collected.



A brief overview of common types of DU designation under different site scenarios is provided below. Additional examples of DUs are provided Appendix C.

Example scenarios include:

- Small- to medium-size commercial and industrial sites;
- New residential housing developments;
- Existing schools;
- Agricultural fields;
- Former industrial complexes;
- Petroleum facilities;
- Buried waste pits and subsurface contamination;
- Excavations and stockpiles; and
- Canals, ponds and streams.

The examples can also be applied to other types of sites, including mining areas.

Although some generalities can be made, the type, size, shape and number of DUs for a particular project is specific to that project and takes into consideration the past, present and future use of the site as well as the objectives of the party carrying out the investigation (refer to Fact Sheet #2 in Section 4, Appendix A). If a contaminant poses multiple potential environmental concerns (e.g., both direct exposure and leaching to groundwater), the smallest DU (i.e., the highest resolution) should be selected to investigate the soil. Different media within the DU (e.g., soil, groundwater, soil vapor, indoor air) should be sampled and tested separately as appropriate to address the investigation questions. If the investigation is being carried out purely for due diligence purposes as part of a property transaction and contamination is not known or suspected to be present, then testing of a relatively small number of large, Exposure Area size DUs might be adequate. The appropriate level of detail necessary to meet the short- and long-term needs of all stakeholders should be discussed with the responsible party prior to completion of the sampling plan.

Previously collected data for samples collected from single points, referred to as “discrete” or “grab” samples, during earlier stages of an investigation as well as unstructured “composite” samples can be used to assist in the designation of DUs for more comprehensive testing but should not be relied on for final decision making (Brewer et al. 2017a,b). A discussion of the limitations of these types of sampling methods is provided in Appendix E.



3.3.1 EXPOSURE AREA DUS

In risk assessment, an area of exposed soil that people regularly come in contact with and that could potentially be contaminated is referred to as an “exposure area.” Examples include parks, playgrounds and unpaved areas of commercial or industrial properties, landscaped areas, and construction worker areas (Figure 3-2; see also Appendix C). Individual areas or in some cases the entire area are initially designated as Exposure Area DUs for characterization. Soil capped under a building or parking lot or soil in the subsurface that could be excavated and spread out in the future could be considered to represent future Exposure Area DUs.



Figure 3-2. Example commercial-industrial and residential Exposure Area Decision Units

Designate Exposure Area DUs based on current land use (e.g., the playground at a school or an unpaved work or eating area at a commercial or industrial site) or future use of the area (e.g., a proposed residential development). The upper 10 to 20 cm of soil is normally designated to assess current direct exposure risk. Testing of deeper soil suspected to be contaminated is often required to address potential disturbance of the soil in the future and redistribution on the surface.

If a known or suspect area of contamination is within an Exposure Area DU that could cause the entire DU to fail risk limits, then this area is normally isolated and independently tested as a Source Area DU (Section 3.3.2). This minimizes the need for retesting if a problem is discovered and optimizes the speed and efficiency of remedial actions. If the objective is simply to establish the presence or absence of risk for the Exposure DU as a whole, then subdivision characterization of subareas within the DU is not necessary.

3.3.2 CONTAMINATION SOURCE AREA DUS

Isolation and testing of known or suspect areas of heavy contamination to optimize remediation and reduce risk is an important part of most site investigations. Such areas, referred to as “Source Area” (or “Spill Area”) DUs, should be designated as separate DUs for investigation. Source Area DUs normally fall within and drive risk for larger Exposure Area DUs. Examples of source areas include former chemical storage areas, areas where chemicals were spilled or disposed of during factory operations, former waste pits and layers of buried



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waste (Figure 3-2).

Contamination designated as localized Source Area DUs at industrial properties often cover an area of only a few tens to hundreds of square meters and can be relatively shallow (thin). Examples include waste sand blast material, lead shot or lead-based paint in the upper few centimeters of soil. In other cases,



Figure 3-3 Examples of surface and subsurface Source Area Decision Units and DU Layers.

contamination can extend to considerable depths, particularly for releases of solvents, petroleum or other liquids. The extent of subsurface contamination can also depend on whether the chemical was spilled at the surface, leaked from underground tanks and pipes or was intentionally buried. The suspected duration of the release should also be considered. Slow but long-duration leaks of liquid chemicals from underground tanks and pipes can result in very deep contamination extending to the water table. In case of dense, non-aqueous liquids (DNAPL), contamination can extend to well below the water table.

Exploratory boreholes and pits or trenches can be very useful for initial investigation of contamination in subsurface soils (see Section 3.3.4). Divide subsurface soil into separate DU layers for sample collection and analysis based on the information obtained in the CSM (Figure 3-4). If no obvious contamination or differences in soil type is identified in exploratory boreholes or pits and trenches but confirmation that subsurface soil is clean is required, then consider designation of multiple 0.5 m to 2 m DU layers for sample collection to a depth appropriate for the planned project.



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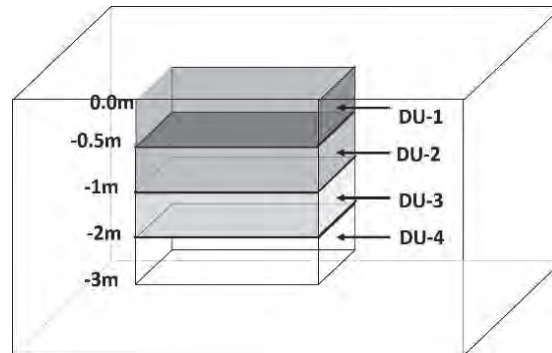


Figure 3-4. Example designation of subsurface DUs.

Default DU volumes typically range from 100 to 400 m³ (approximately 100 to 400 cyds). Large DU volumes can be appropriate for due diligence testing of subsurface soil that it not anticipated to be contaminated. This might include, for example, relatively deep soil (e.g., DU-3 in figure) situated below an anticipated clean subsurface Boundary DU (e.g., DU-2) at a site where shallow, surface soil is impacted by releases of lead, PCBs or other relatively immobile contaminants (e.g., DU-1).

Obtaining precise, *in situ* concentration data for heavily contaminated subsurface soil might not be necessary in cases where the soil will be excavated or managed in place. Confirmation samples can instead be collected after initial remediation or to establish the boundaries of contaminated soil to be left on site. In other cases, high-resolution data for heavily contaminated subsurface soil might be required to estimate the mass of a contaminant and/or to help optimize the design of *in situ* remediation. Failure to initially obtain representative soil data is the leading cause of unsuccessful *in situ* remediation actions.

3.3.3 CONTAMINATION SOURCE BOUNDARY AREA DUS

Boundary DUs are used to surround and isolate areas of anticipated heavy contamination. The DUs are designated in anticipated clean or only moderately contaminated areas based on the initial CSM (Figure 3-5). This helps to minimize the inclusion of otherwise clean soil in subsequent remedial actions and help control

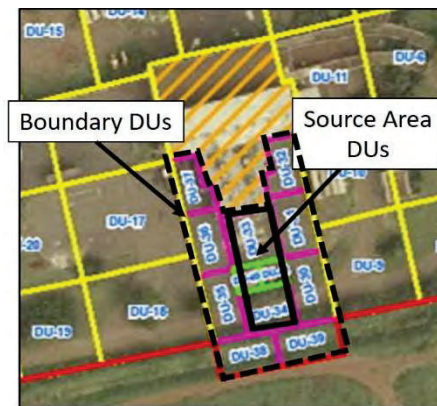


Figure 3-5. Source Area DUs in area of anticipated, heavy contamination surrounded by Boundary DUs in



project costs.

The number and design of Boundary DUs designated as part of a project is site- and project-specific. In the case of the example depicted in Figure 3-5, the boundary between heavily contaminated soil and anticipated clean soil was clearly evident in the field and there was high confidence that the Boundary DUs would indeed be clean. In other cases, designation and testing of two or more rings of Boundary DUs might be desired in the event that the innermost DUs fail screening levels.

Vertical delineation of contamination should similarly be determined based on designation and testing of vertical Boundary DU layers. If necessary, the extent of subsurface contamination can be initially approximated using exploratory borings, pits or trenches (refer to subsurface investigation guidance in Appendix G). Limitations of testing of single cores of soil and the potential for both false negatives and false positives with respect to the large-scale assessment of risk and remediation needs must be considered. More reliable DU sampling methods and data should be used to confirm the boundaries of identified or suspect source areas. Designate boundary DU sizes in a manner that will optimize potential remedial actions but avoid the need for remobilization for collection of additional samples if action levels are failed.

3.3.4 EXCAVATIONS AND STOCKPILES

Detailed guidance on testing of excavation sidewalls and stockpiles is provided in Section 4, Appendix H. Guidance on testing of stockpiles or other sources of imported fill material is provided in Section 4, Appendix P.

The walls and floor of an excavation should be designated as separate DUs for sample collection (Figure 3-6). Lateral and vertical Boundary DUs are designated to confirm the removal of a source area of contaminated soil. Multiple DU layers may need to be designated within a DU wall to target specific layer intervals of contamination. It may also be necessary to divide the floor of the excavation into multiple DU areas to confirm the vertical cleanup of contaminated soil. Such decisions must be made on a site-specific basis.

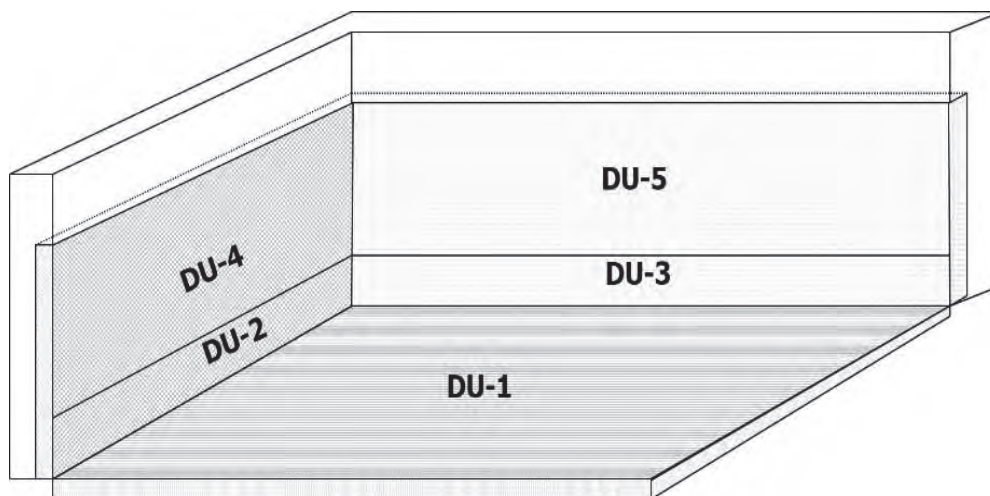


Figure 3-6. Example DU designation for the walls and floor of an excavation.



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The concept of Exposure Area and Source Area DUs also applies to testing of stockpiles of excavated soil. Designation of DUs for stockpiles, in contrast, based on the risk-based volume of soil associated with the anticipated reuse, for example reuse as fill in a residential redevelopment project (resident exposure risk) or disposal at a landfill and reuse for daily cover (worker exposure risk). Example risk-based volumes of soil are presented in Table 3-1. Additional guidance on the designation of DUs and the collection of samples from stockpiles is provided in the appendices. This approach can also be used for testing of stockpiles of dredged sediment that is proposed for reuse as fill material.

Table 3-1. Example default DU volumes for stockpiles.

Receiving Site Land Use	¹Default DU Volume	Notes
Unrestricted Use (includes small parks and low-density, residential developments with individual yards)	100 m ³	Assumes 500 m ² reuse exposure area and 20 cm placement thickness (or 400 m ² area and 25 cm placement thickness).
Schools and High-Density Residential Developments	500 m ³	Assumes 0.5-hectare exposure area and 10 cm placement thickness.
Commercial or Industrial use only (including agricultural lots)	500 m ³	Assumes 0.5-hectare exposure area and 10 cm placement thickness.

1. Testing of 100 m³ to 500 m³ DU volumes of soil is also anticipated to address potential soil leaching and groundwater protection concerns (assumes up to a 2,000 m² source area to a depth of 0.25 cm; after USEPA 1996).

Larger DU volumes up to several thousand cubic meters might be acceptable for stockpiles of soil or dredged sediment when the origin of the soil is well known and there is no reason to suspect significant contamination. Examples include excess soil generated during construction on previously undeveloped land or dredged sediment from areas not susceptible to contamination. Some level of minimal testing in this case is often desirable for legal due diligence purposes.

When investigating stockpiles, large stockpiles should be separated or split into separate piles based on soil type, source, potential for contamination, potential environmental concerns associated with targeted chemicals (e.g., direct exposure or leaching) and proposed reuse of the soil. Stockpiles of soil are normally flattened and divided into DU volumes for testing using the same concepts of source areas and exposure risk as applied to testing of *in situ* soil (Figure 3-7). Alternative methods for sample collection where pile cannot be flattened are discussed in Section 5.4.4 and Appendix H. This includes progressive testing and clearing of soil and accessible faces of a stockpile and excavation of small “windows” and trenches to access interior



areas of a pile.

Consideration of the “fluff factor” and larger volumes can be made for stockpiled *ex situ* soil that will be compacted during use as fill material. Allowances for larger DU volumes can be made for deeper material not known or suspected to be contaminated (e.g., native soil) as well as sediment to be dredged from areas that lack known sources of potentially significant contamination, where testing is primarily for due diligence purposes. Refer to Appendix H for additional guidance.

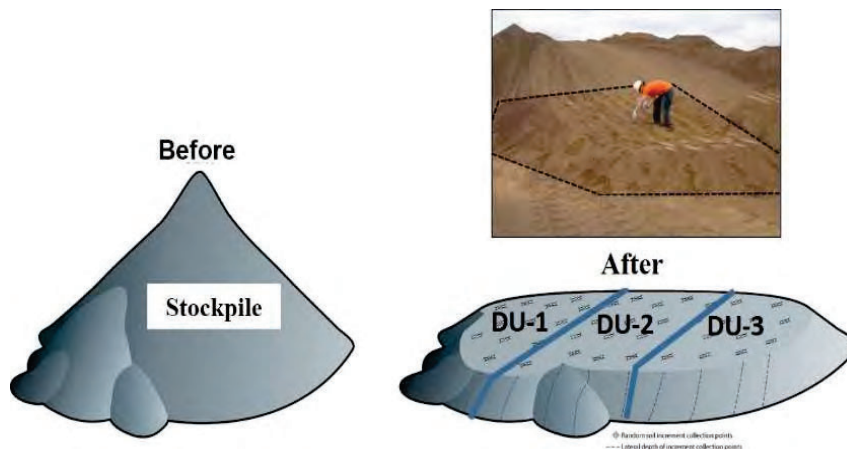


Figure 3-7. Example flattening of a soil stockpile and division into risk based DUs for sample collection. Trenches, pits or other types of “windows” can be cut into stockpiles to assist in sample collection when space is not available for flattening the pile.

3.3.5 SEDIMENT DECISION UNITS

Decision Unit and Multi Increment Sample investigation methods are used for characterization and remediation of contaminated sediment in a similar manner as described for soil. Examples include the investigation of direct-exposure risk to benthic and aquatic organisms and *in situ* or *ex situ* characterization of dredge material for reuse as fill in upland areas or for offshore or onshore disposal.

Designate DUs based on risk to ecological receptors or optimization of anticipated dredging or *in situ* remediation actions. Ecological risk is assessed based on exposure to benthic organisms as well as factors such as particle size for open water disposal. Human health risk associated with upland reuse of dredged sediment as fill material in the same manner as described for stockpiles and Exposure Area DUs.

Example investigation questions that can be used to designate DUs for assessment and sample collection include:

1. Is the sediment within this specific DU area of the lake, river, canal, etc., contaminated above levels of potential concern?



2. What is the lateral and vertical extent of contamination above levels of potential concern?
3. Is contamination restricted to specific depositional areas of sediment?
4. Do risk-based DU volumes of sediment proposed for dredging or already dredged and stockpiled material meet comparable risk-based screening levels for proposed reuse in upland areas?

Specific areas and volumes of sediment must be assigned to each investigation question. In some cases, a single DU might be adequate. In other cases, designation of multiple DUs might be required.

Dredging projects can generate very large volumes of sediment desirable for use as fill material in upland areas. DU volumes up to 1,000 m³ or greater might be acceptable for testing of sandy sediment not located in the proximity of a contaminant source and lacking in significant, fine-grained material potentially associated with contamination imported by currents. Examples include dredging of mobile sand bars in rivers and tidally influenced areas. Fine-grained sediment in harbors, canals and similar low-energy bodies of water that are highly susceptible to releases of contaminants will normally require testing of much smaller DUs to optimize costs associated with offshore or onshore disposal or *in situ* remediation.

For proposed upland reuse of dredged material, DU volumes should reflect the potential exposure scenario in relation to the proposed area size and placement thickness. For example, the dredged sediment is proposed to be reused as fill material at a planned 0.5-hectare soccer field. In this case, the exposure is assumed to be primarily a concern for the upper 10 cm of soil, for a total volume of 500 m³. Larger DU volumes might be acceptable depending on reuse area and assumed uniformity of contaminants within the sediment (refer to case studies in Appendix C).

As discussed in the harbor dredging case study in Appendix C, sample collection can be carried out *in situ*, during dredging or after the dredged material has been placed in stockpiles. The most optimal strategy for a specific project will depend on factors that include accessibility and availability of cost-effective methods for *in situ* sample collection and the availability of space for stockpiling as well as time constraints for *ex situ* sampling.



3.4 SAMPLING AND ANALYSIS PLANS

3.4.1 SAP OUTLINE

The Sampling and Analysis Plan (SAP), developed during Step 6 of systematic planning, specifies the final design and configuration of the environmental measurement effort required to resolve issues and questions stated in the systematic planning steps (Steps 1- 5). The SAP is a comprehensive document that would enable an experienced field sampling team unfamiliar with the site to come in and examine the site and collect the required samples and field information. The SAP designates the types and quantities of samples or monitoring information to be collected; where, when and under what conditions they should be collected; the variables to be measured; and the Quality Assurance/Quality Control (QA/QC) procedures to ensure that sampling design and measurement errors meet the tolerable decision error specified.

The QA/QC procedures are described within the Quality Assurance Project Plan (QAPP), which is included within the SAP. The site-specific Health and Safety Plan is also included as part of the overall SAP (alternately, the Health and Safety Plan can be presented with the SAP in a site Work Plan). The SAP must be flexible and dynamic to deal with unexpected discoveries or circumstances that may be encountered during the site investigation. To ensure appropriate characterization of the site and to minimize the need to perform additional sampling, it is recommended that SAPs be reviewed and approved by the HEER Office. In addition, it is important to consult with the laboratory while developing the SAP to ensure objectives are in alignment with chosen laboratory practices, and to provide contingencies for matrix problems that may occur. Important among such issues to discuss with the laboratory are expectations for storing remaining portions of MI samples that have been analyzed, until site sampling decisions are completed. Based on initial data analysis or new information, additional analyses may be conducted from stored bulk MI samples rather than having to mobilize and collect additional samples in the field.

The suggested outline for the SAP is as follows:

- | | |
|-----------------------------------|--|
| I. Introduction | VI. Description of Sampling Activities |
| II. Site Background | VII. Analytical Methods |
| a. Site description | VIII. Quality Assurance Project Plan |
| b. Site characteristics | IX. Documentation and Reporting |
| III. Investigation History | X. Schedule |
| IV. Site Investigation Objectives | XI. Health and Safety Plan |
| V. Scope of Work | XII. References |

More detailed information regarding the outline, format, and required content of the SAP is presented in Section 18.



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3.4.2 SAMPLE COLLECTION STRATEGY

A sampling strategy should reflect the approach that will best meet investigation objectives within acceptable uncertainty limits, with consideration taken for efficient use of time, money, and human resources. Section 3.4.1 discusses sample collection strategies for soil and sediment.

The HEER Office strongly encourages the use of Multi Increment/Decision Unit strategies to investigate contaminated soil. Multi Increment samples are collected using a probabilistic sampling theory and involve the collection of a large number of increments (30-100) from within the target DU. Each increment is made up of approximately 5 to 50 grams of soil. The increments are combined to form a single, Multi Increment sample for the DU. A detailed discussion of Multi Increment sampling approaches is provided in Section 3.4.1.

See Section 6 for sample collection strategies for groundwater, and Section 13 for information and references regarding ecological risk evaluations.

3.4.3 HEALTH AND SAFETY PLANS

Hawai'i hazardous substance release sites fall under the definition of "uncontrolled hazardous waste sites" pursuant to Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) [Title 29 Code of Federal Regulations](#) (CFR) Section 1910.120(a)(1). A health and safety plan (HASP) is required under Title 29 of the Code of Federal Regulations, Section 1910.120 (Hazardous Waste Operations and Emergency Response), which includes a requirement for a hazard communication program meeting the requirements of 29 CFR 1910.1200. Like rules were adopted under Hawai'i Administrative Rules (HAR) Title 12, Chapters [60](#) and [203.1](#), Division of Occupational Safety and Health Standards. The Health and Safety plan is typically a part of the SAP (or alternately, part of the site Work Plan). The HEER Office recommends that an employer develop a written Health and Safety Plan, which includes the following elements:

- An organizational structure
- A comprehensive work plan
- A site-specific health and safety plan
- A health and safety training program
- A medical surveillance program
- Standard operating procedures for health and safety
- Any necessary interface between general program and site-specific activities

The OSHA HAZWOPER Standard, Title 29 CFR 1910.120, requires that personnel working in and around hazardous waste have a site-specific HASP and competent safety officers to enforce health and safety rules. OSHA has determined that employees must be trained if they work in proximity to hazardous chemicals with a potential for release or substantial threats of release, without regard to the location of the hazard.

An OSHA-certified 40-hour class focusing on HAZWOPER training is required for those who are performing regular work on hazardous waste sites; an annual 8-hour refresher course is required to maintain the certification achieved through this training. An OSHA-certified 24-hour course is required for those who have occasional exposure to hazardous waste. In addition, an 8-hour course is required for supervisors and



management personnel who oversee hazardous waste projects. The amount of training required is contingent upon an employee's responsibilities and involvement with hazardous materials; these must be clearly established by the employer and communicated to the employee(s). The HEER Office does not approve Health and Safety Plans but does require that one be in place for field activities at hazardous chemical release (or suspect release) sites. Contact the Hawai'i Division of Occupational Safety and Health (HIOSH) for detailed information on HASPs and organizations offering HAZWOPER training.

3.4.4 QUALITY ASSURANCE PROJECT PLANS

Data acceptance criteria, developed during Step 5 of systematic planning, are presented in the Quality Assurance Project Plan (QAPP) which is the formal project document that specifies the operational procedures and QA/QC requirements for obtaining environmental data of sufficient quantity and quality to satisfy site investigation objectives. The QAPP is required for all data collection activities that generate data for use in decision-making. It contains information on project management, measurement and data acquisition, assessment and oversight, and data validation and usability. The QAPP integrates the DQO, the data collection design, and QA/QC procedures into a coherent plan to be used for collecting data that are of known quality and adequate for their intended use. The QAPP is typically presented as part of the SAP (Step 6 of systematic planning) and should include the following elements:

1. Quality assurance (QA) objectives for measurement
2. Sample chain of custody
3. Calibration procedures
4. Analytical methods
5. Data reduction, validation, and reporting
6. Internal quality control (field and laboratory checks)
7. Performance and system audits
8. Preventative maintenance
9. Data measurement assessment procedures (precision, accuracy, and completeness)
10. Corrective actions

Participation of the laboratory that will be utilized is important to ensure capabilities are agreed upon and not assumed. Other considerations such as potential changes to cleanup processes, lab filtration, etc. should be discussed ahead of time when potentially contaminated samples are collected.

More detailed information regarding the outline, format, and required content of the SAP, which includes the QAPP, is presented in [Section 18](#).

Additional information regarding the development of a QAPP is available in the Uniform Federal Policy for Quality Assurance Project Plans ([USEPA/DoD/DOE, 2005](#)), Guidance for Conducting Remedial Investigation and Feasibility Studies under CERCLA ([USEPA 1988](#)), and Guidance for Quality Assurance Project Plans ([USEPA, 2002g](#)). In addition, Data Quality Assurance and Quality Control procedures are discussed in detail in [Section 10](#).



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Section 3.5

SITE INVESTIGATION REPORTS

3.5 SITE INVESTIGATION REPORTS

Accurate and thorough documentation of the sample plan design, sample collection and handling procedures, laboratory analyses, data assessment, and a summary of the data collected are crucial to the site investigation. The laboratory selected should adhere to a comprehensive Quality Assurance Plan and SOPs for sample analyses. The HEER Office strongly encourages active communication, including draft report reviews and subsequent meetings or conference calls, to prevent costly remobilizations to collect additional data. The following reports (and major elements) are typically prepared and submitted to the HEER Office for review.

- Sampling and Analysis Plan
 - Sampling design
 - Preliminary Conceptual Site Model
 - Preliminary site investigation objectives and DQO
 - QAPP
 - Safety and Health Plan
- Site Investigation Report
 - Site history
 - Site investigation objectives (including DQO)
 - Selection of Decision Units, including replicates
 - Figures displaying all DU locations on site
 - Identification of information needs
 - Sample collection and analysis methods
 - Summary of analytical results
 - Data assessment
 - Summary of extent and magnitude of contamination
 - Preliminary Environmental Hazard Evaluation
 - Conclusions and recommendations

Additional guidance on report formats and content is presented in detail in [Section 18](#). The HEER Office requires that the lateral and, as needed, vertical extent of soil and groundwater (and in some cases soil gas) contamination be clearly depicted on to-scale maps and cross sections of the site. Shading or other graphics should be used to depict DUs suspected to be contaminated above levels of potential concern. This information is then used in the Environmental Hazard Evaluation to identify specific environmental hazards posed by the identified contamination as well as the specific areas of the site where these hazards are present (see [Section 13](#)). The results of the preliminary Environmental Hazard Evaluation may require that



additional data be collected at the site (e.g., soil gas data to evaluate potential vapor intrusion concerns) or that additional tests be carried out on existing samples. After all environmental hazards are adequately identified, delineated and evaluated, the final Site Investigation and Environmental Hazard Evaluation reports are used to support and assist in the development of appropriate response actions.

Not all projects will require that formal sampling plans and related reports be submitted prior to initiating site investigation activities; this will vary from site to site and should be discussed with the overseeing project manager in the HEER Office.



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3.6.1 USE OF MULTI INCREMENT SAMPLES TO REPRESENT DUS

Risk is always assessed based on the “true” or “mean” concentration of the contaminant in each subject DU (USEPA 1987, 1988, 1989a,b,c,d, 1991, 1992, 2014). The objective of sample collection is therefore always to estimate the concentration of the contaminant for the targeted DU volume of soil or sediment as a whole. Ideally, the entire DU volume of soil would be removed, taken to a laboratory for testing and the concentration of the subject contaminant for the volume of soil as a whole determined. This is not normally possible, however, and a representative sample of the targeted area and volume of soil must instead be collected.

Obtaining reliable data requires that both the sample in the field is representative of the targeted DU area and volume of soil and that the subsample collected for testing at the laboratory is representative of the sample submitted. This is most efficiently accomplished through the collection of a single MI sample from each DU (HIDOH 2016). A sample is prepared by collecting and combining a large number of small masses or “increments” of material throughout the entire DU area and volume of soil or sediment (Figure 3-8). The science background and use of MI sample collection methods is based on Pierre Gy’s Theory of Sampling (Pitard 2019). A detailed review of Gy’s sampling theory is provided in Appendix D.

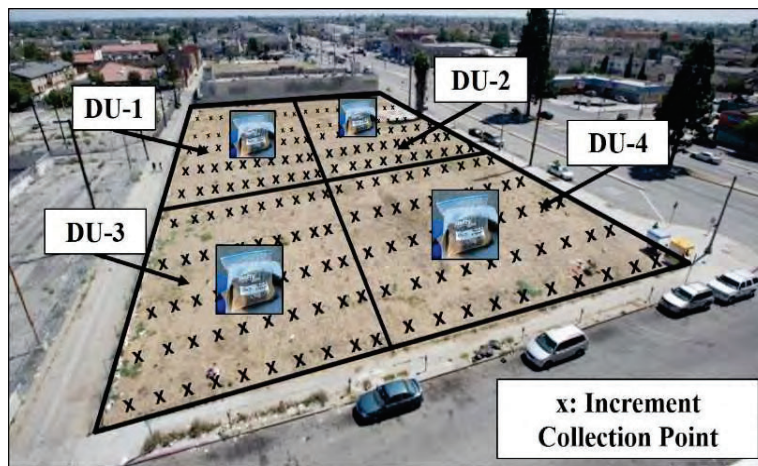


Figure3-8. Depiction of increment locations for collection and preparation of a single MI soil sample from each of the four depicted Decision Units.

Detailed guidance on the collection of MI samples from surface and subsurface soil as well as excavations and stockpiles is provided in Appendices F through I. The collection of sediment samples is discussed in Appendix J. Processing and testing of MI samples is discussed in Appendix K.

The largest source of error in environmental data is associated with the collection of soil or sediment samples in the field, followed by the collection of subsamples for testing at the laboratory (Pitard 2019; Esbensen 2020). Error associated with analysis of the subsample by the laboratory is typically small by comparison. Field sample and laboratory subsample collection error is controlled by ensuring that an adequate number of



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increment collection points are utilized and that an adequate total mass of material is collected (refer to Appendix D).

Strong attention to detail is required to collect, process and test a sample in a manner that ensures representative data. Independent replicate samples are collected from a portion of the DUs tested for a specific project (Appendix L). Types of replicate sample data that should be generated for all projects include (see Sections 3.6.5):

- Field Sample Replicates (minimum two from at least one DU; tests the overall precision of the total sample collection, processing and analysis methods);
- Field Subsample Replicates (minimum two from at least one DU Layer; tests the precision of subsampling methods required to reduce sample mass for samples prepared from subsurface borings);
- Laboratory Subsample Replicates (minimum two for at least one sample if subsampling of increments is carried out in the field as often required for subsurface investigations; tests the precision of method used by the laboratory to collect a subsample from a field sample for analysis); and
- Laboratory Analytical Replicates (minimum one for each set of samples; tests the precision of the equipment used to analyze a subsample).

Although the collection and testing of field and laboratory replicates adds to the cost of an investigation, the results are critical to demonstrate the reproducibility of the data and defensibility of decisions made. Sample data can only be assumed to be truly representative if the samples were collected properly in the field to begin with (refer to Appendix D).

Additional information on General Field Operations is provided in Appendix M, including field documentation, equipment preparation and decontamination, disposal of investigation derived waste and completion of field work. Common mistakes made in the field and laboratory and that can be reflected by highly variable replicate sample data are discussed in Appendix N. Guidance on the investigation of contaminated soil and sediment under the Toxics Substances Control Act (TSCA) is provided in Appendix O.

3.6.2 SAMPLE MASS, INCREMENT NUMBER, QUALITY AND DISTRIBUTION

Field Sample and Laboratory Subsample Mass

Gy's Theory of Sampling and experience in the field indicates that a minimum total field sample mass of 1 to 3 kg is necessary to reliably represent the tens, hundreds or even thousands of metric tons of soil incorporated into a DU (Brewer et al. 2017; Walsh 2020). This is intended to address both potential errors associated with the physical nature of the soil or sediment as well as error associated with the collection of sample increments in the field (refer to Appendix D). The mass of increments should remain consistent between collection points and be adequate to achieve the target bulk sample mass after combination into a single sample. For example, the preparation of a 1 to 3 kg 50-increment sample requires an increment mass of 20 to 60 grams.

The final bulk mass applies to the targeted soil particle size and should consider potential sample loss from



sieving and the dampness of the soil or sediment. This is not normally an issue for soil but can require the need for a larger sample of saturated sediment in the field, particularly if the sample contains a large amount of fined-grained, clayey material.

A minimum sample mass of 300 grams is recommended for samples to be tested for volatile chemicals (Appendix I). Samples might be prepared, for example, by combination of 60, five-gram increment plugs from excavation sidewalls or from subsurface cores (Appendix I). A smaller bulk sample mass is acceptable due to an expected, more uniform (but still heterogeneous) distribution of liquid volatile contaminants in soil within source areas. Larger samples to be tested for volatile chemicals should be collected, if possible, to increase the representativeness of the data. Refer to Appendix 1 Section 1.5 for guidance on alternatives to the collection of soil samples for assessment of risks posed by volatile chemicals.

Alternative preservation methods for soil samples to be tested for volatile chemicals are discussed in Appendix I. Note that soil data for volatile compounds are most efficiently used to estimate the mass of the contaminant present within a DU as a tool to assist in the design of remedial efforts. The primary environmental risks associated with volatile chemicals are vapor intrusion into overlying buildings and/or leaching of the contaminant into underlying groundwater. In both cases, the collection of soil gas sample data can serve as more directly applicable alternative to soil sample data, provided that soil gas-based action/screening levels are available or can be developed for comparison (refer to Section 13 of the TGM; see also HDOH 2017).

An ideal analytical subsample mass of 30 grams is recommended to control Fundamental Error associated with <2mm particle size material as well as error associated with the collection of material from a processed sample. If a maximum 10-gram subsample is necessary, then consider the collection of additional subsample replicates in order to better assess error in the data (refer to Sections 3.6.5). A ten-gram subsample is adequate for <250 μ m material. Sample processing and subsample collection methods, normally carried out at a fixed laboratory, are discussed in Appendix K.

Number of Sample Increments

The number of increments necessary to reliably represent a targeted DU area and volume of soil or sediment depends on the distributional heterogeneity of the contaminant within the DU. Statistical analysis of data from field studies indicate that as few as 30 increments per sample can be adequate for characterization of soil impacted by airborne or waterborne contaminants, including stack emissions from a smelter, application of water-based pesticides to field areas or testing of sediment (Brewer et al. 2017; Walsh 2020). A minimum of 75 increments per sample is recommended for cases where the contaminant is present as small nuggets or chips. Examples include polychlorinated biphenyls (PCBs) derived from construction debris or waste oil, fragments of lead-based paint and fragments of lead related to munitions. A default minimum of 50 increments per sample is recommended for the investigation of soil where the nature of the contamination is uncertain.

A larger number of increments might be necessary due to the sample collection method used. For example, the collection of 60 plugs/increments of soil are required to meet the minimum mass requirement of 300 grams if a small syringe is used to collect five-gram plugs of soil from an excavation floor. As an alternative, two side-by-side, five-gram plugs could be collected and combined as a single increment from each of 30



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points in the DU face.

The sample increment requirements apply to both surface and subsurface soil and sediment. The fact that the targeted DU layer of soil or sediment is covered with other soil or sediment (or water) does not alter the need to adequately capture and represent distributional heterogeneity. Consider designating a larger number of boring/increment locations than needed for adequate sample preparation as part of subsurface investigations where areas of refusal due to large rocks or other interferences are anticipated. Nonetheless, achieving an optimal number of increments per sample for testing of subsurface samples might in some cases not be possible due to access and budget limitations. Consider designated extra core increment collection points at sites where refusal in some areas is anticipated due to the potential presence of rock, subsurface utilities or buried debris. As discussed below and in Appendix G, data based on samples prepared from less than 30 increments should be considered suspect. Follow-up testing should be carried out if the soil is excavated or otherwise exposed in the future.

If a significant discrepancy between replicate sample data is observed and determined to be based on field error, then the collection of new samples might be required (refer to Appendix L). If this is the case, the number of increments collected per sample and the total mass of the sample should be increased. The original DU could in theory be subdivided into smaller DUs for retesting in order to better isolate subsequently identified areas of known or suspected higher contamination. Redesignation of DUs after initiation of a project is discouraged, however. Designation of DUs should be based on risk or optimization of anticipated remedial actions, not simply in an effort to improve sample data quality.

Increment Quality

The physical collection of sample increments is briefly reviewed in Sections 3.4.4. Detailed guidance on the collection of sample increments in the field under different site and contaminant scenarios is provided in Appendices F through I. The collection of subsamples at the laboratory for analysis is discussed in Appendix K.

The quality of individual increments depends on the shape, mass and uniformity of each increment. Increments should be core shaped and of sufficient mass to meet the minimum target bulk MI sample mass requirement. Ideal increments are core shaped and collected from the entire thickness of the targeted DU layer.

Increment Spacing and Location

Spacing increment collection points evenly throughout the DU both laterally and vertically is important to ensure that sample data are representative and reproducible. A systematic random method of increment placement is recommended (Figure 3-9). Increment locations are arranged in a grid cell pattern with a fixed interval, starting from a random point in one corner the DU. Subsequent increments are collected from the same location in all remaining cells. This applies to the collection of both surface and subsurface increments. Refer to Appendix N for common problems associated with increment spacing in the field.



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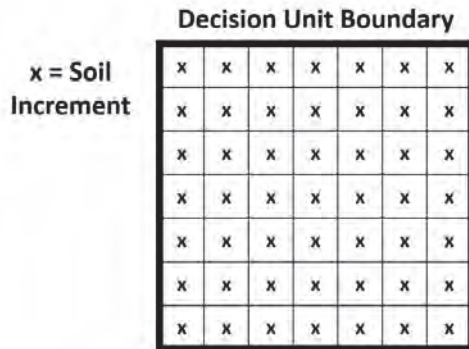


Figure 3-9. Systematic random collection of increments from center of each increment grid cell to prepare a single MI sample (cells for collection of a 49-increment MI sample depicted).

An initial estimate of adequate increment spacing is calculated taking the square root of the DU area divided by the targeted number of increments to be collected:

$$\text{Increment Spacing} = \sqrt{\frac{\text{DU Area}}{\# \text{ of Increment Points}}}$$

This simulates division of the DU into individual, increment collection cells, with a single increment collected from the center of each cell. After calculating the square root of this area, the length of each side of the cell is obtained (assuming square cells).

Refer to Table 3-2. For example, assume a 500 m² DU and the desired collection of a 50-increment, sample. The calculated increment spacing is 3.2 meters. This reflects the assumption that the DU is divided into 50 square cells with 3.2-meter sides and area of 10 square meters. A sample is prepared by collecting an increment from a random point within a cell, such as the center and then 3.2 meters parallel to the DU boundary to the same point in the adjacent increment cell. This is continued until an increment has been collected in each of the 50 hypothetical cells. The increments are progressively combined into a single bulk sample as they are collected.



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Table 3-2. Example Increment spacing based on DU size and target number of increments (meters).

# Increments	Decision Unit Area (hectares)								
	0.10	0.20	0.25	0.50	1.0	2.0	3.0	4.0	5.0
30	5.8	8.2	9.1	13	18	26	32	37	41
40	5.0	7.1	7.9	11	16	22	27	32	35
50	4.5	6.3	7.1	10	14	20	24	28	32
75	3.7	5.2	5.8	8.2	12	16	20	23	26
100	3.2	4.5	5.0	7.1	10	14	17	20	22

This approach applies to both rectangular and irregular-shaped DUs. The spacing can be adjusted as needed to help establish a manageable grid for sample collection, provided that an overall systematic random increment collection method is maintained. Examples of proper and improper increment collection patterns are included in Appendix F.

3.6.3 SAMPLE COLLECTION AREA PREPARATION

Remove Surface Debris and Vegetation

Site preparation activities are discussed in Appendix F. A site inspection should be performed prior to mobilizing to collect samples to determine if debris or vegetation needs to be removed. This might include temporary removal of stored material, automobiles and other equipment as well as cutting grass and removal of other low vegetation.

If surface soil is targeted for sampling, then care must be taken not to disturb the soil immediately below the root zone of the vegetation during site clearing activities. If soil within the root zone is targeted, then care must be taken to only remove vegetation directly above the ground surface. Bulldozers or similar equipment should normally not be used to scrape the ground surface since contaminated soil could become mixed with grubbed material. For testing of very large, heavily vegetated areas, consider surveying and clearing narrow, equally spaced transects that correspond to the desired spacing of increments for the DU.



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Clear Underground Utilities

Sources for information on the presence of underground utilities, tanks, waste burial pits or other features of the site should be reviewed. These underground features and utilities could interfere with subsurface sample collection or pose a danger to either the utilities or samplers.

Example sources of information include:

- Information provided by public utility companies;
- Call before you dig (<https://call811.com/>)
- Maps that depict underground water, sewer, electric, gas, fiber optic and other utilities, as well as irrigation lines, buried tanks and pipeline, former building foundations, etc.;
- Interviews with site workers; and
- Field observations of manhole covers, vent pipes, piping and other signs of possible subsurface infrastructure or buried material.

The specific location, arrangement and depth of underground utilities must be determined to the degree possible and marked at the surface to assist in the placement of subsurface borings. Toning methods such as electro-magnetic/radio frequency technology should be considered for sites where subsurface utilities are suspected but the exact locations are unknown.

3.6.4 COLLECTION OF SOIL SAMPLES

Detailed guidance on the collection of MI samples from surface soil, subsurface soil, excavations and stockpiles, sediment and the collection of samples to be tested for volatile chemicals is provided in the Appendices F through I. A brief overview of sample collection methods is provided below. For the purposes of this guidance, the term “soil” is applied to any type of unconsolidated particulate matter. Larger particles, including cobbles and gravel as well as rock are not typically considered part of a DU and in general do not need to be sampled beyond basic field screening (e.g., observance of stains, sheens when placed in water, odors, etc.).

Proper selection of sampling tools is crucial. The tools utilized must ensure that the soil increments are core-shaped or otherwise have no depth bias to the extent possible and that the mass of individual increments collected is relatively equal. The total mass of the combined increments must be sufficient to achieve the target minimum mass of the MI sample to be collected. “Discrete” samples or “composite” samples that do not meet the strict quality criteria of MI samples should never be used for final decision making purposes (refer to Appendix F).

Be aware that not all laboratories are set up to carry out MI sample processing and analysis. Contact the laboratory ahead of time to discuss sample processing and analysis requirements. Ensure that the lab can meet the requirements for sample preparation and minimum sample mass. If available, obtain a copy of the laboratory’s Standard Operation Procedure for management of MI samples for your records.



Surface Soil

A detailed discussion of methods and tools to collect MI samples from exposed surface soil under different site conditions is provided in Appendix F. The sample collection team progressively moves through the DU to individual increment collection points until the preparation of the sample is completed (Figure 3-10).



Figure 3-10. Collection of a sample increment and progressive combination of increments to preparation of a single MI sample for the targeted DU.

Increment collection can range from relatively easy for loose, fine-grained soil exposed at the surface to very difficult for gravelly or hard-packed soil. A variety of tools can be used to collect surface soil samples. The most appropriate tool is selected based on soil type, compactness, rock abundance and targeted increment depth.

Soft Soil. For soft soil, samples are usually collected using sampling tubes or similar manual coring equipment (depicted in Figure 3-10). Small-diameter sampling tubes (2 to 4 cm) are simple, fast and efficient and suitable for a one- or two-person field team. Larger-diameter sampling tubes (more than 5 cm) will in most cases result in increment masses larger than the amount needed to prepare a 1 to 3 kg bulk sample. While larger samples might be more representative, secondary subsampling in the field could be required to prepare a final sample mass that can be managed by the laboratory. This will introduce additional error into the resulting data.

Loose, dry soil. A flat-bottomed trowel or similar tool might be required for the collection of increments from loose, dry soil (e.g., dry sand or silt). The tool should have a straight, front edge and perpendicular, square sides.

Semi-compact, fine-grained soil. For semi-compact, fine-grained soils, a power drill equipped with an auger bit that has a hollow center flute can significantly expedite the collection of increments (e.g., SpeedBore bits; refer to Appendix F). A 2.5 cm hollow auger drill bit produces 30 to 50 g of soil for every 15 cm of drilling. The use of drills with standard winged bits should be avoided since they are less efficient at soil removal and can result in oversized increment masses.

Moderately compacted soil. A hand-held, battery-powered drill equipped with a small, spade bit can be very efficient for loosening soil at increment collection points and collecting samples in moderately compacted soils.

Significantly compacted or gravelly soil. A hammer drill with a cement bit or spade bit connected to a portable generator or a manual pickaxe or heavy rock hammer is usually required for the collection of



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increments from significantly compacted or gravelly soils. In these cases, the bit is used to create an opening and use a trowel to collect an increment from the exposed sidewall. See Appendix F for additional guidance and examples.

Subsurface Soil

A detailed discussion of methods and tools to collect MI samples from subsurface soil is provided in Appendix G. Identical requirements for the collection of high-quality, representative samples from surface soil apply to subsurface soil, with the added field factor that overlying soil must be penetrated to collect increments and prepare samples. The subsurface soil is first subdivided into individually targeted DU layers (Figure 3-11). Ideally, a 1 to 3 kg, 30- to 75-increment sample is collected from each layer.

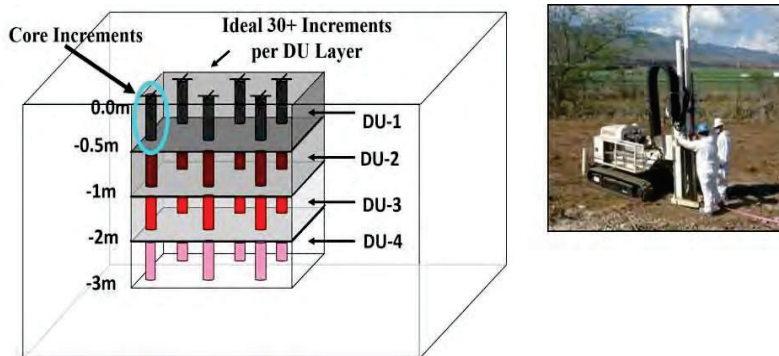


Figure 3-11. Depiction of soil increment cores collected from boreholes installed through subsurface DU layers using a direct-push drilling rig.

When site conditions allow, direct-push drill rigs are very efficient for the rapid collection of samples from subsurface soil (depicted Figure 3-11). The rigs can also be used to collect soil gas and/or groundwater samples, if needed. Each core extracted from a targeted DU Layer represents a single increment for that layer, similar to the collection of individual, core-shaped increments from surface soil.

Use a measuring tape and/or soil characteristics used to designate each DU layer to identify targeted DU layers in a core increment (Figure 3-12). The mass of a single core increment is usually too large to be used for the preparation of a manageable sample. The field collection of a representative subsample of adequate mass (e.g., 20 to 60 g) from each DU layer increment is therefore required. For example, this can be achieved by collection of a long, thin wedge from the entire length of the DU layer increment. This might not be possible for gravelly soils. An alternative is to collect four to ten, evenly spaced, five-gram plugs of soil along the entire interval of the increment (depicted in Figure 3-12). Core increment subsamples corresponding to the same DU layer are combined on site to prepare an MI sample for that layer, similar to the approach used to prepare a sample of surface soil.



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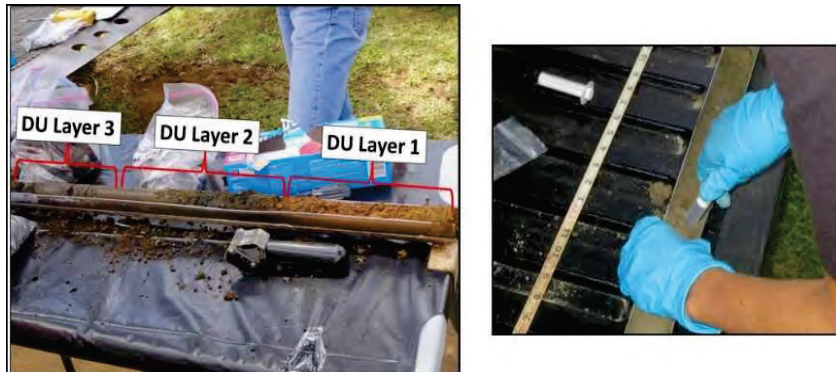


Figure 3-12. Identification DU layers and collection of subsample increments.

Be aware that direct-push methods often compress soil and the resulting core may be shorter than expected, if so scale the size of each DU depth accordingly. Also avoid the first inch or so of soil in each DU depth interval as it tends to contain slough from the previous DU interval.

A backhoe can be used to dig potholes or trenches at increment collection locations for testing of soil within approximately 1.5 m of the surface (Figure 3-13). This approach might be necessary for soil that contains large rocks or other obstacles where a direct-push rig otherwise cannot be used. An increment can be collected from each targeted DU layer by using a trowel to scrape a continuous mass of soil from the exposed excavation wall. Samples must be collected with care to ensure that the spacing between increments is equal both laterally and vertically across the DU. As is the case for borings, each pit represents a single increment collection location. Multiple increments cannot be collected from a single pit, since the spacing between points in pits is likely to be much smaller than the spacing between increments from separate pits.



Figure 3-13. Use of exploratory pits, trenches and borings for initial investigation of subsurface soil contamination and exposure of DU layers for more detailed testing.

The installation of 30 or more borings or test pits to prepare MI samples for subsurface DUs might not be feasible for some projects due to access, cost or other limitations. In these cases, the reliability of the sample data is limited and the soil should be retested if exposed or excavated in the future.



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Single exploratory borings can be used to identify the approximate presence or absence of contaminated subsurface soil (Figure 3-14). Use changes in soil type, the presence of debris, staining and/or odors to designate individual DU layers for testing in each core. A portable XRF and other screening test methods can also be used screen cores and initially test samples in the field.

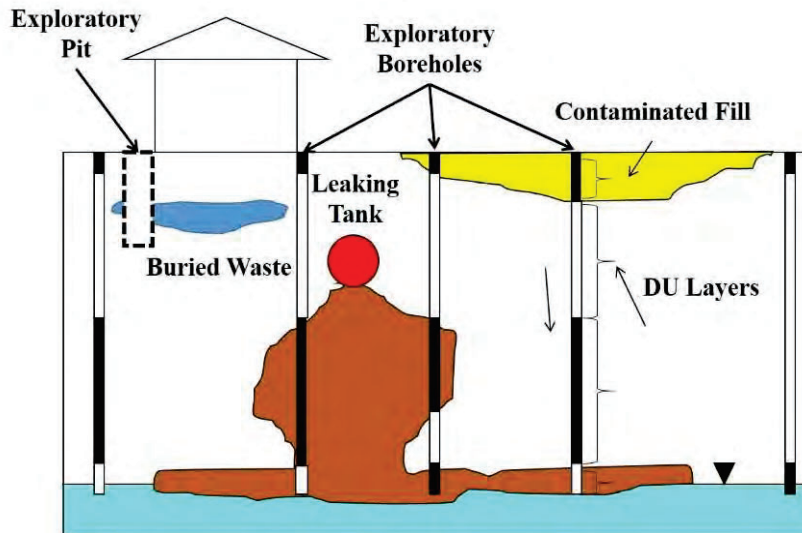


Figure 3-14. Use of single boreholes for initial estimation of extent and magnitude of subsurface contamination.

Additional guidance on the use of exploratory borings, pits and trenches for limited testing of subsurface soil is included in Appendix G. Each interval of core targeted for sample collection is treated as a separate DU (refer to Figure 5-14). Collect the entire core interval as a single sample and submit to the laboratory for processing and analysis when possible. The collection of a representative subsample might be required if the mass of the core interval exceeds 2 to 3 kg.

Be aware of the possibility for a small number of random pits, trenches or borings to miss widespread but discontinuous subsurface contamination. Document the limitations on data reliability for recommendations of additional action. Testing of subsurface soil can also be carried out following excavation by temporarily storing the soil in stockpiles. Refer to the section below for guidance on testing of stockpiles.

Excavations

Refer to Appendix H for detailed guidance on testing of excavations. At a minimum, a single, 30- to 75+-increment sample is collected from each sidewall and the floor of an excavation to confirm removal of contaminated soil (Figure 3-15). Multiple DU layers are sometimes needed to test excavation walls. Multiple DUs might also be appropriate for the floors of very large excavations. As a default, assume a 10 to 15 cm sidewall and floor DU layer thickness for sample collection. Collect replicate samples from the sidewall or floor area where the potential for residual contamination is greatest.



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Prior to excavation, a push rig can be used to collect confirmation samples from the anticipated walls and floor of the excavation, as depicted for the rear wall of the excavation in the Figure 5-8. Soil within the boundaries of the clean DUs is then removed and no further sample collection is required, expediting the completion of the project. Additional confirmation samples should be collected, however, if an adequate number of borings and proper spacing between increments is not feasible prior to excavation.

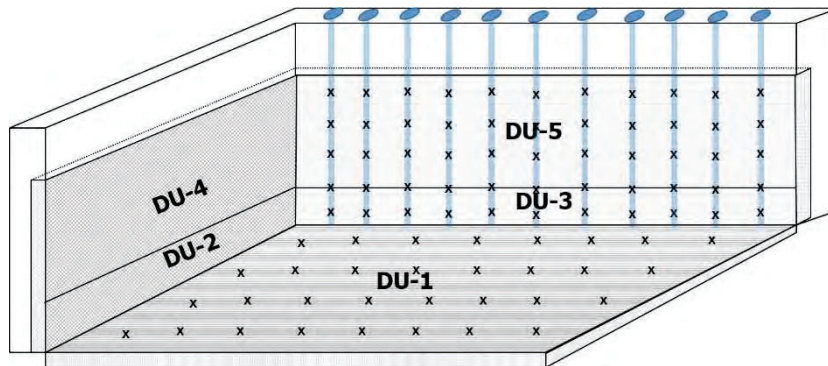


Figure 3-15. Example increment collection locations from excavation floor and sidewall DUs (all increment locations not depicted).

Stockpiles

A detailed discussion of methods and tools to collect samples from stockpiles is included in Appendix H. Divide the stockpile risk-based volumes of soil based on the anticipated reuse or disposal of the material. For example, assume a maximum DU volume of 500 m³ is recommended for soil to be used for fill material at schools or high-density, residential apartment developments (refer to 3.3.4). This equals the volume of soil that might be spread over a 2,000 m² area to a depth of 25 cm, representing a hypothetical, future exposure area. Larger or smaller DU volumes might be applicable for other proposed reuses.

It is important that all soil in the volume of material targeted for testing as a single DU be accessible for the collection of sample increments. Several options are available, depending on site conditions and the ability to easily access the soil. In the first option, the pile is flattened to a thickness of one meter or less (refer to Figure 3-7). Sample increments are then collected from cores extracted from the full thickness of the DU and subsampled to prepare a sample, similar to the manner used to collect a sample from shallow, subsurface soil. If coring is not possible, excavate small trenches or potholes as needed and collect increments from the top, middle and bottom of each, targeted DU volume in a systematic random manner. A single increment can again only be collected from each location in order to meet the requirement for increments to be evenly spaced apart both laterally and vertically in a grid-like fashion.

The second method is to collect increments during the formation of the stockpile, as the soil is being moved (Figure 3-16). Collect evenly spaced increments from the excavator loader bucket as if each bucket represented a small pile of soil on the ground and considering the total volume of soil to be tested for each DU. If a conveyor belt is being used, then collect increments at an even spacing along the belt as the soil moves past, ideally using an automatic belt sweep. Note that this method requires working around moving



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equipment and can pose a risk to both the sampler and the equipment operator. Extreme caution must be used when collecting samples.

The third method is to progressively collect MI sample from the exposed face of the unflattened stockpile as the soil is needed (Figure 3-17). A sample is collected in a systematic random manner similar to the collection of samples from flattened stockpiles. This approach requires repeated mobilization for sample collection that can increase overall testing costs but is sometimes necessary due to limited space at the project.



Figure 3-16. Collection of MI samples during soil transport and stockpile formation.

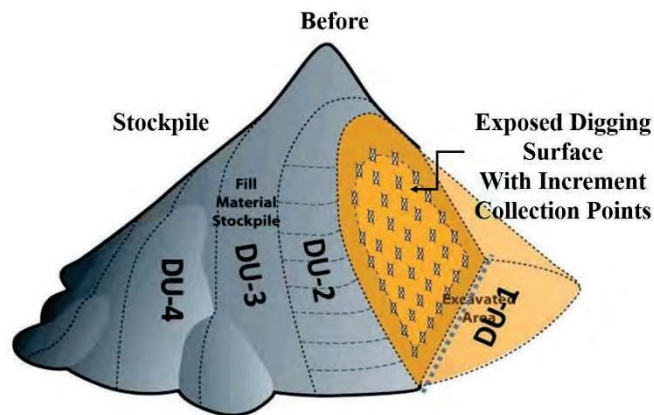


Figure 3-17. Progressive collection of MI samples from the exposed surface of an unflattened stockpile as the soil is needed.



Volatile Organic Compounds

Detailed guidance on the collection of samples to be tested for volatile organic compounds (VOCs) is provided in Appendix I. Samples to be tested for VOCs are most commonly collected from borings or from excavation sidewalls and floors. Samples must be collected and preserved in a manner that minimizes VOC loss prior to analysis at the laboratory.

The field collection method is similar to non-volatile pollutants, with increments collected in a systematic random manner. Before a sample is collected, the total mass of the combined increments is estimated and an equivalent volume of methanol is placed into an amber glass sample bottle (e.g., 1 ml methanol to 1 g soil; Figure 3-18). Increments are then progressively added to the bottle as the sample is collected. A smaller increment mass (e.g., 5 to 10 g) is typically extracted at each increment point using a syringe-type coring device and increments are immediately placed in a glass container with methanol.

Shipping constraints might require placement of increments in multiple small vials for combination at the laboratory. Methanol-preserved samples should be stored in a cool location away from direct sunlight until they can be placed in a cooler or refrigerator. Methanol should never be stored in a refrigerator. It is a clear, odorless, flammable liquid and could produce an explosion in a refrigerator. Only store methanol in coolers with ice or gel ice.

The entire sample jar or a representative aliquot of methanol collected from the jar after equilibration is submitted to the laboratory for testing. It is preferable that methanol is added to the sample bottle by the laboratory prior to initiation of field work, when possible. This will also help avoid problems with methanol storage in the field.

Alternative preservation methods for soil samples to be tested for volatile chemicals are discussed in Appendix I. This includes combining increments in a container with minimal headspace and immediately freezing them for shipment to the laboratory. Some loss of volatiles is inevitable using this approach, however. Neither of these methods might be feasible for investigations to be carried in remote areas where transport and storage of methanol or freezing samples frozen is not practicable. The primary risks associated with volatile chemicals are vapor intrusion into overlying buildings and/or leaching of the contaminant into underlying groundwater. In both cases, the collection of soil gas sample data can serve as a more directly applicable alternative to soil sample data (refer to Section 7 of the TGM). Soil gas-based action levels for vapor intrusion risk and leaching concerns are provided in the HDOH EAL guidance (HDOH 2017; refer also to Section 13 of the TGM). Direct testing of groundwater can serve as an alternative to use of soil gas action levels for leaching concerns if practicable.



Figure 3-18. Preparation of an MI sample to be tested for VOCs by placing sample increments

Collection of Sediment Samples

An overview of sampling tools for different sediment sampling scenarios is provided in Appendix J. The collection of representative samples from sediment can pose similar challenges to testing of subsurface soil but is possible with adequate planning and the right kind of equipment (Figure 3-19). The fact that the targeted sediment is overlain by a layer of water (or other sediment) does not negate the need to designate well-thought-out DUs and utilize MI sampling methods to ensure that representative data are collected.

Tube-shaped sampling tools are preferred because they allow the collection of core-shaped increments. Relatively simple manual sampling tubes can be used to collect sample increments from soft sediment in shallow (<1 to 3 m) water or from sediment exposed during low water levels. Small battery powered Vibracore tools or direct push drilling rigs and a small boat are very useful for the collection of sample increments in sediment at a depth of less than 5 m (refer to Appendix J).



Figure 3-19. Use of a simple tube attached to piping to collect sediment sample increments in a shallow canal.



Larger Vibracore tools and a larger boat or floating platform are required for deeper water. Tools used to collect grab samples of sediment from deep water are less reliable due to the large mass of sediment collected, the inability to collect core-shaped increments and the loss of fine material during increment retrieval. New technologies are emerging for smaller scale samples in deep water, including the use of submersible platforms (refer to photos included with harbor investigation example in Appendix C).

Testing of sediment for reuse as fill material in upland areas is most efficiently accomplished after the sediment has been dredged, spread out in an upland area and allowed to dewater. The stockpiles can then be tested using DU-MIS methods described in Section 3.4.4.4 and Appendix H.

3.6.5 FIELD SAMPLING QUALITY CONTROL

Replicate Field Samples

Sample data must be reproducible for decisions regarding risk and remediation to be made with a high degree of confidence. Overall sampling method precision is tested by the collection and testing of independent “replicate” samples from at least ten percent of the DUs designated as part of an investigation (refer to Appendix L).

A minimum of three samples is collected, including the primary sample and two replicates. These are referred to in total as “triplicate” samples. Triplicate samples are prepared by the collection and combination of three separate increments in each increment collection cell within the DU (Figure 3-20; Samples A, B and C). Increments associated with each separate sample are combined to prepare the final sample. For example, all “A” increments collected within the DU are combined to prepare Sample A, the “B” increments combined to prepare Sample B, etc.

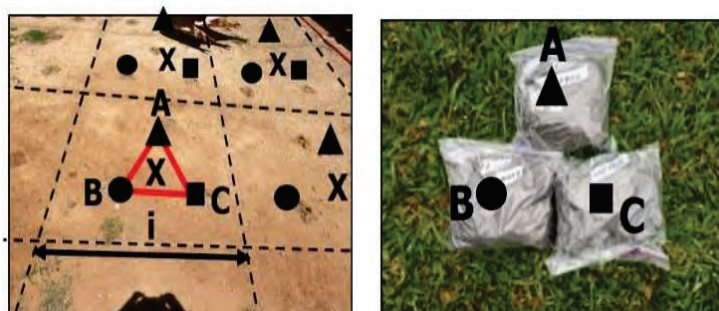


Figure 3-20. Collection of separate soil increments to prepare three, independent MI replicate samples from a single Decision Unit.

The fact that a subsurface soil DU is covered by other soil does not negate the need to collect replicates samples in the same manner as carried out for more accessible, surface soil DUs. As described in Appendix G, independent sets of cores are collected and subsampled to prepare the replicates. The same is true for investigation of shallow sediment covered by water. If the collection of *in situ* replicate cores is not feasible for a project, then consider verification of initial sample data with the collection of additional, replicate samples when the material is excavated (or dredged) in the future. This can be included in an long-term or construction-related, Environmental Hazard Management Plan prepared for the site (refer to TGM Section



19).

The Relative Standard Deviation of the sample data is used to assess overall sampling method precision (see Section 3.6 and Appendix L). This requires the collection of at least three independent samples from the DU. Each set of sample increments must be collected from completely independent (systematic random) locations. This is most easily done in the field by spacing increment collection points in an equilateral triangular fashion around the center point of each grid cell, as depicted in Figure 3-20. The sides of the triangle should be equal to approximately one third of the calculated increment spacing for the DU as a whole. Each sample must be collected in an identical manner. This includes the number, shape, depth, mass and spacing of individual increments. The final mass of the samples should be very similar.

At least one set of replicate samples should be collected. Replicate samples should normally be collected from the DU anticipated to be most contaminated, since data from this DU will be used to determine the need for remedial actions. It is also recommended that a set of replicate samples be collected from the DU with the highest risk of exposure, for example a play area for children, if different from the DU area suspected to of be most contaminated. The collection of at least one set of triplicate samples from an anticipated clean area can assist in clearing these areas from additional sampling, should the precision of replicate sample data from a highly contaminated DU prove to be unacceptable.

In some cases, the mass of individual increments will be too large to prepare a manageable sample after combination into a single sample. This can normally be controlled for the collection of surface samples but is often unavoidable for the collection of subsurface samples, where cores from borings must be collected. The combined cores across all boreholes for an individually targeted DU Layer represents the primary field sample collected for that layer. Reducing the sample to a manageable mass is accomplished through the collection and combination of small subsamples from each core increment for that layer. This necessarily introduces error into the resulting sample data. The precision of the data is tested through the collection of at least two sets of replicate subsamples for at least one of the DU layers and submittal of triplicate samples to the laboratory for testing.

Equipment Decontamination

Sampling tools do not need to be cleaned between the collection of increments within the same DU, since the increments will ultimately be combined into a single sample. Large amounts of excess soil should be removed from tools between increment points, to help ensure that the same mass of material is collected from each location.

Sampling tools must be cleaned before the collection of increments from different DUs. The following “triple wash” method is recommended:

1. Remove clumps of soil and debris from the sampling device by hand (use steam or high-pressure water for drilling equipment);
2. Wash with mild detergent;
3. Rinse with purified water (tapwater considered safe for drinking is adequate); and
4. Rinse again with purified tap water.



Dye-free and perfume-free soap should be used to decontaminate equipment. The use of phosphate-free soap is only required if phosphate is a contaminant or otherwise parameter of potential concern (e.g., for testing of nutrient levels in agricultural fields). Separate or decontaminated tools should be used to collect replicate samples from the same DU to ensure the independence of the resulting data.



3.7 LABORATORY SAMPLE PROCESSING AND TESTING

Detailed guidance for processing and testing of MI samples in accordance with Gy's Theory of Sampling is provided in the Appendix K. Proper processing and subsampling of samples is a critical part of sampling theory and obtaining representative sample data. Inadequate sample processing and subsampling for laboratory analysis negates the effort made to collect the sample in the field and can lead to erroneous and costly mistakes.

Processing of a sample to be tested for non-volatile chemicals consists of three steps (Figure 3-21):

1. Air drying;
2. Sieving to isolate the target particle size; milling (grinding) the sample is an additional step that might be required under some circumstances (refer to Appendix K); and
3. Collection of a subsample for analysis.



Figure 3-21. Collection of an analytical subsample from a MI sample after air drying and sieving.

The time required to air dry a sample can vary from one to several days depending on the soil type and original moisture content. Samples should only be dried in an oven if no adverse alteration of the targeted contaminants of concern is anticipated (generally not recommended for organic compounds). The dried sample is passed through a sieve to remove large rocks and sticks and isolate the DU target particle size for testing (e.g., <2 mm; Section 3.3). A sectoral splitter is preferred to collect representative subsamples when available (third from left in Figure 3-21; refer also to Appendix K). Otherwise, the sieved material is spread to a very thin layer. A small, flat-bottomed tool with perpendicular, square sides is then used to collect a subsample from at least 30 points in the same manner as the original sample was collected in the field (far left in Figure 3-21).

Table 3-3 summarizes the minimum-recommended subsample mass (analytical sample) for testing. The recommended masses are considered adequate to address error associated with compositional and distributional heterogeneity within the sample as well as error associated with physical collection of a subsample. The recommendations apply to all contaminants and all analytical methods. A detailed discussion of subsample collection and the basis of the recommended minimum masses is included in Appendix K.



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Table 3-3. Minimum-recommended subsample (analytical) mass with respect to sample preparation method, maximum particle size and subsample collection method.

Sample Preparation Method	Subsample Collection Method	
	Sectoral Splitter	Manual
Unground (<2 mm)	10g	30g
Ground ($\leq 100 \mu\text{m}$)	5g	5g

Replicate subsamples should be collected from 10-20% percent of the samples submitted for a project to assess the precision of the laboratory subsampling and analysis methods (see Section 3.6 and Appendix K). Following this protocol helps ensure that the laboratory data are representative of the sample submitted, just as careful collection methods in the field ensure that the sample is representative of the targeted DU area and volume of soil.

Additional replicate subsamples should be collected to verify the precision of the data if the default subsample masses noted in Table 3-3 cannot be accomplished due to laboratory constraints. A minimum subsample mass of 10 g is recommended for any unground material. Laboratories can normally accommodate this requirement if notified in advance, although an additional fee might be charged to cover the additional analytical materials and time required in comparison to default testing procedures. This reflects the true cost to obtain data that are reliably representative of the sample submitted, and to ensure that efforts to collect representative samples in the field are not wasted.



3.8 DATA QUALITY EVALUATION

3.8.1 OVERVIEW

The quality of the sample data generated must be reviewed to determine if the data are reliable to answer the risk and/or remediation-based questions prepared at the beginning of the project. A summary of the data quality evaluation process is depicted in Figure 3-22. This begins with a review of the methods used to collect samples. The precision and reproducibility of the data generated is then reviewed. This is based on a comparison of replicate data for field samples and laboratory subsamples as well as quality control data for the laboratory analyses. The latter, an important part of data validation (USEPA 2002c), most commonly plays a minor role in overall sample data error and is not discussed in detail in this guidance document (refer to Appendix D).

Significant variability in replicate samples can in most cases be traced to error in the collection of samples in the field, for example an inadequate number of increments and/or sample mass. The presence of nuggets of contaminants in samples can cause laboratory subsample replicates to fail quality control limits but this can be overcome by milling (grinding) the samples prior to testing and/or testing a larger subsample mass. Error related to actual analysis of the subsample is rarely a source of significant error.

3.8.2 REVIEW OF SAMPLE COLLECTION AND PROCESSING METHODS

A checklist of review topics related to sample collection, processing and analysis is provided in Table 3-4. The table is not intended to be comprehensive for all aspects of the investigation and should be modified as appropriate on a site-specific basis. Refer to the sections noted for each topic for additional information. Deviations from the recommended methods should be discussed in the investigation report and resulting limitations of the data should be discussed in the report recommendations. Methods to help minimize data error, when the sample collection and analysis conditions noted in Table 3-4 cannot be met, are discussed in the associated appendices.

3.8.3 REVIEW OF REPLICATE DATA PRECISION

A detailed discussion of the collection and evaluation of replicate sample data review is provided in Appendix L. The precision of the overall sample collection, processing and testing methods utilized is evaluated based on a comparison of data for replicate samples collected from the same DU (refer to Section 3.4.5). Statistical evaluation of replicate sample data involves a two-step procedure. The first step is to calculate the relative standard deviation (RSD) of the contaminant concentration for the triplicate data set. The RSD reflects the precision of the total sampling method, including field and laboratory error. The lower the RSD, the more precise the sampling method used and the more reproducible and reliable the data for individual DU where replicate samples were not collected.

An RSD of <15% is desirable for laboratory subsample replicate data, although a higher RSD might be required for analytical methods with an inherent poor precision. High RSDs otherwise suggest poor subsampling methods and/or an inadequate subsample mass. Use of a sectoral splitter or even milling (grinding) of the sample might be required to achieve acceptable replicate data results for samples that contain small chips or nuggets of contaminants.



Table 3-5 summarizes the recommended use of sample data based on the precision of replicate field sample data. A more detailed discussion is provided in Appendix L. An RSD for replicate field sample data of $\leq 35\%$ suggests that the overall sampling method has good reproducibility. Assuming the samples were properly collected and processed (e.g., adequate number of increments and final sample or subsample mass), the data can be used for reliable decision making. An RSD $>35\%$ but $<50\%$ indicates decreased precision. In most cases, the data will still be acceptable for decision making, given the typical safety factor built into risk-based screening levels.

An RSD $>50\%$ but $<100\%$ indicates poor data precision. The laboratory subsample replicate RSD should be checked to determine if the error is primarily attributable to processing and testing of the sample versus collection of the sample in the field. If the RSD of the subsample data is significantly less than the RSD for the field replicate samples then error is most likely attributable to the initial collection of the samples.

Recollection of the samples using a greater number of increments and larger final sample mass should be considered. As an alternative and if deemed acceptable by a risk assessor trained in Gy's Theory of Sampling, use the highest value of the replicate sample data to make decisions for the DU where replicate samples were collected. Use the replicate data set RSD to upwardly adjust data for DUs where replicate samples were not collected (Adjusted Data = Original Data + (Original Data x RSD)).

An RSD $>100\%$ indicates very poor data precision. If laboratory subsample data do not indicate significant error at the laboratory, then recollection of samples from affected DUs should be considered. As an alternative, a risk assessor trained in Gy's Theory of Sampling should be consulted regarding the safety level incorporated into the target action level or cleanup level and the need to resample high exposure risk areas (e.g., all sample data less than one-third of action levels). Additional evidence of data acceptance (or rejection) should be provided for decision-making purposes, including site history and potential for contamination above the level of concern, adequacy of methods used in collecting, processing and analyzing samples, closeness of data to action levels and safety margins built into the action levels, and other information as available and pertinent.

High RSDs can become unavoidable as contaminant concentrations approach the laboratory method reporting and detection limits. Consultation with a risk assessor trained in MI sampling methods is required to determine if the collection of additional samples is warranted. Replicate sample RSDs also typically increase as the magnitude of contamination increases. Sample data that significantly exceed target screening levels is generally acceptable for decision making even though the RSD of the replicate data indicate very poor precision. Experience has demonstrated that the collection of a minimum of 50 increments per sample and a total bulk sample mass of 1 to 3 kg can reliably improve the precision of replicate sample data to $<35\%$.

3.8.4 ADDITIONAL MANIPULATION OF MULTI INCREMENT SAMPLE DATA

Additional manipulation of MI sample data is not an integral part of Gy's Theory of Sampling. Routine calculation and use of a 95% Upper Confidence Level (UCL) of the mean based on replicate sample data was strongly discouraged in conversations with Francis Pitard and a group of international sampling statisticians during the World Conference on Sampling and Blending in Beijing, China, in 2018 (Pitard, 2018, personal communication; see also Pitard, 2019). Doing so can lead to false conclusions regarding potential error in the data. This is especially true when the methodology used to collect and process samples does not meet



requirements for testing of particulate matter, as is common in traditional discrete sample investigations.

Additional manipulation of MI sample data is generally not recommended. This includes calculation of a 95% UCL for replicate samples collected from the same DU and modification of sample data for DUs where replicate samples were not collected. Such manipulation is not an integral part of the Theory of Sampling and is normally discouraged. Note that calculation of a 95% UCL for replicate MI samples is unrelated to calculation of a 95% UCL for a single set of discrete samples. The latter is carried out as an attempt to compensate for inherent compositional and distributional heterogeneity of contaminants in soil. This is accomplished under the Theory of Sampling for particulate matter through the collection of a single sample of adequate bulk mass from throughout the targeted DU and careful processing and testing of the sample at the laboratory. Refer to Appendices D and E for additional discussion.

Some risk assessors may nonetheless desire to use of a 95% UCL of the mean calculated from replicate MI sample data as an added measure of confidence that the true mean of the DU does not exceed a targeted action level or risk. Examples include action levels for contaminants that include only a minimal safety margin and the need to address risk more conservatively in anticipated high-exposure areas. This and the specific statistical test(s) to be used to calculate a 95% UCL should be discussed with the overseeing regulatory agency at the beginning of the systematic planning process and incorporated into decision statements for individual DUs.

Routine QA/QC, including method blanks, lab control spikes, surrogate recoveries, etc., should also be reviewed. These are a critical part of a work plan but are not covered in detail in this guidance.

3.8.5 COMMON DU-MIS INVESTIGATION ERRORS AND PROBLEMS

A discussion of common investigation errors and problems is provided in Appendix N. Poor replicate data precision is related to errors made in the field collection of samples and processing of samples at the laboratory. Examples include:

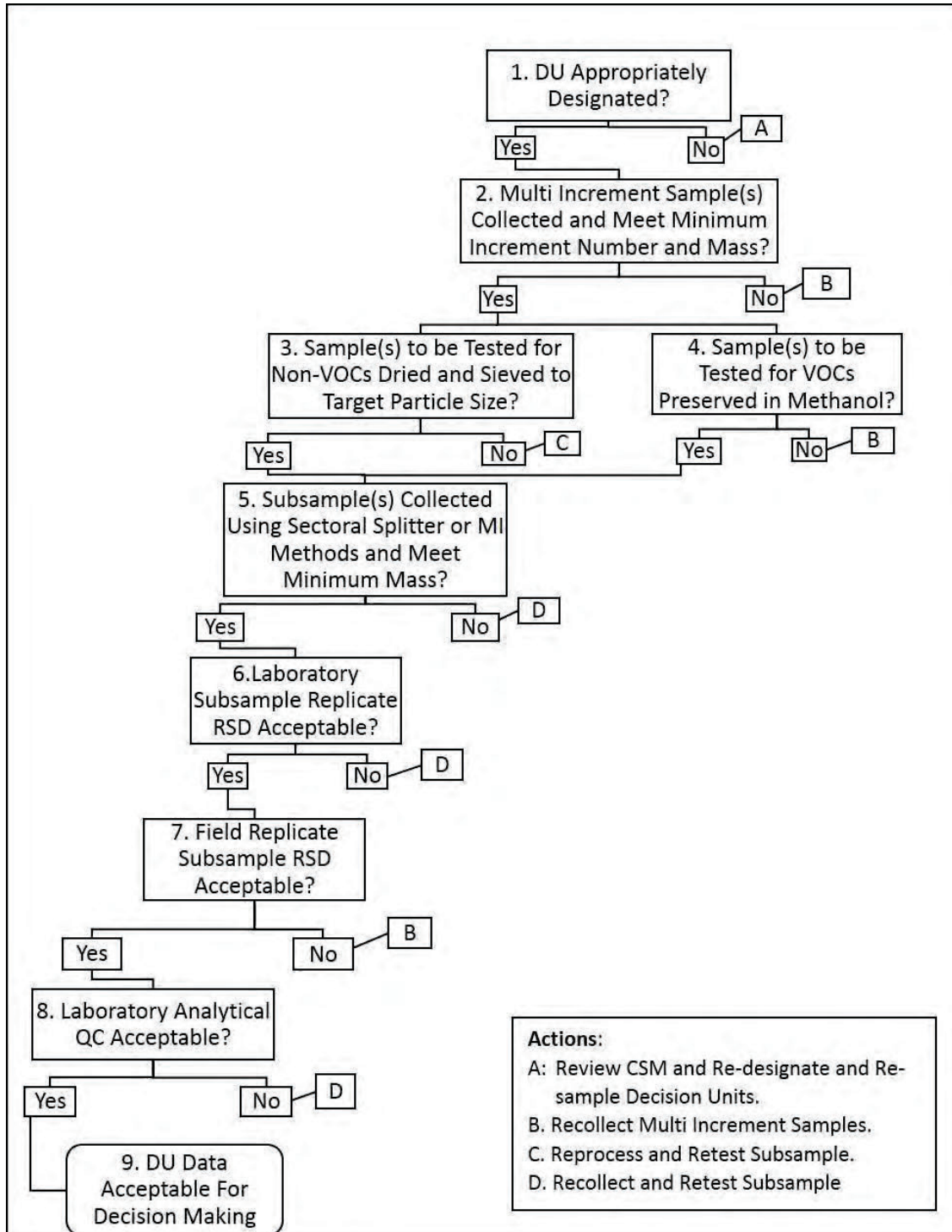
1. Inappropriately sized DUs;
2. Data gaps between surface DUs or subsurface DU layers;
3. Inadequate number of increments and bulk sample mass;
4. Improper increment spacing;
5. Improper increment shape;
6. Use of increment splits as discrete sample data points;
7. Inadequate laboratory processing;
8. Inadequate subsample mass for testing; and
9. Lack of field replicate sample data to test overall sampling method precision.

Consideration of these potential problems prior to finalization of the site investigation work plan and the collection of samples will help improve data precision and data representativeness as well as reliability in final decision making.



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Figure 3-22. Decision Unit (DU) Data Quality Evaluation process.





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Table 3-4. Sample data quality and usability checklist.

Acceptable?	Site Investigation Stage
	<u>Conceptual Site Model and DU Designation (Appendices B and C)</u>
	<ul style="list-style-type: none"> • Site history and potential sources and type of contamination well understood?
	<ul style="list-style-type: none"> • To-scale map depicting location and size of Decision Units provided?
	<ul style="list-style-type: none"> • Site investigation questions used to designate Decision Units for testing clearly stated and based on risk and/or optimization of anticipated remediation requirements?
	<ul style="list-style-type: none"> • Questions and decision statements developed for individual Decision Units presented?
	<ul style="list-style-type: none"> • Area and total volume of soil associated with each Decision Unit noted and acceptable for intended purposes?
	<u>Field Sample Collection (Appendices D, F through J)</u>
	<ul style="list-style-type: none"> • Summary of sample collection methods provided, including approximate final mass of each sample and number of increments included in each sample?
	<ul style="list-style-type: none"> • Samples prepared by collecting and combining a minimum number of increments appropriate for anticipated types of contaminants?
	<ul style="list-style-type: none"> • Increments appropriately spaced and collected?
	<ul style="list-style-type: none"> • Complete, unobstructed access to all portions of the DU soil available for sample collection?
	<ul style="list-style-type: none"> • Core-shaped increments collected?
	<ul style="list-style-type: none"> • Samples to be tested for volatile chemicals preserved in methanol in the field or otherwise met requirements for alternative preservation and testing methods?
	<ul style="list-style-type: none"> • Minimum sample mass of 1 to 3 kg met (minimum 300 g for samples to be tested for volatile contaminants)?
	<ul style="list-style-type: none"> • Triplicate Multi Increment Samples collected and tested from at least 10% of Decision Units to test total data precision (minimum 1 set per project)?
	<u>Laboratory Processing and Testing (Appendix K)</u>
	<ul style="list-style-type: none"> • Appropriate methods used to process samples and collect subsamples for analysis employed and documented in report prepared by laboratory?
	<ul style="list-style-type: none"> • Samples to be tested for non-volatile chemicals air-dried and sieved to target particle size for each specific Decision Unit?
	<ul style="list-style-type: none"> • Analytical subsample collected using a sectoral splitter or manually collected from at least 30 points?
	<ul style="list-style-type: none"> • Minimum 30-gram analytical subsample mass extracted for <2 mm particle size soil?
	<ul style="list-style-type: none"> • Minimum 10-gram analytical subsample mass extracted for <250 μm particle size soil?
	<ul style="list-style-type: none"> • Triplicate analytical subsamples collected and tested from at least 10% of samples submitted (minimum 1 set)?
	<ul style="list-style-type: none"> • Sample holding times met?
	<ul style="list-style-type: none"> • Analytical quality control and quality assessment criteria met (e.g., spikes, blanks, etc.)?
	<u>Replicate Sample Collection and Data Precision Evaluation (Appendix L)</u>
	<ul style="list-style-type: none"> • Replicate field sample and laboratory subsample data meet data precision requirements?



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	<ul style="list-style-type: none">• Source of error for replicate data that exceed an RSD of 35% determined?
	<ul style="list-style-type: none">• Excessive field error identified and samples recollected or data adjusted for decision making purposes?
	<ul style="list-style-type: none">• Excessive laboratory subsampling error (<35%) identified and subsamples recollected and tested after grinding and/or larger subsample mass collected?
	Identification and Correction of Field and/or Laboratory Errors (Appendix N)
	<ul style="list-style-type: none">• Source of sample collection, processing and/or testing methods identified?
	<ul style="list-style-type: none">• Need for recollection and/or retesting of samples determined?



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Table 3-5. Recommendations for assessment of data quality based on the relative standard deviation of replicate samples.

Replicate Sample	Use of DU Data for Decision Making
<p style="text-align: center;">Good (RSD ≤ 35%)</p>	<p>Data for DUs where replicate samples were not collected can be assumed to be representative without adjustment;</p> <p>Compare unadjusted MIS data directly with target screening values (use arithmetic mean of replicate sample data).</p> <p>Collection of follow-up confirmation samples for DUs, where remedial action is necessary, <i>is not required</i> if data for Boundary DUs meet target screening levels.</p>
<p style="text-align: center;">Moderate (35% < RSD ≤ 50%)</p>	<p>Data for DUs where replicate samples were not collected have lower confidence but are adequate for comparison to screening levels or use in a risk assessment without adjustment;</p> <p>Review and discuss sampling methods and laboratory processing and analysis methods and summarize potential sources of error in reports for future reference (e.g., inadequate increment collection methods, insufficient number of increments, inadequate laboratory processing, etc.);</p> <p>Compare unadjusted MIS data directly with target screening values (use the arithmetic mean of replicate sample data);</p> <p>Collection of more reliable follow-up confirmation samples for DUs, where remedial action is necessary, <i>is required</i> even if data for Boundary DUs meet target screening levels (e.g., number of increments and total sample mass increased; laboratory processing steps improved, etc.).</p>



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<p>Poor (50%<RSD≤100%)</p>	<p>Data for DUs where replicate samples were not collected are not reliably representative of the DU mean;</p> <p>Review and discuss field sampling methods and laboratory processing and summarize potential sources of error in reports for future reference;</p> <p>If the majority of the total error is due to subsampling or analysis in the laboratory (less likely), require the laboratory to reprocess and retest the samples, including milling of samples if necessary, with additional replicate subsamples collected and tested to reassess precision;</p> <p>If replicate sample data precision is still poor, consider retesting affected DUs using samples with a greater number of increments and total bulk mass;</p> <p>OR, If determined acceptable by a risk assessor trained in MI sampling methods:</p> <p>For DUs with replicate sample data, compare the highest reported concentration of the contaminant to the screening or cleanup level;</p> <p>For DUs without replicate sample data, adjust the reported contaminant concentration upwards by the RSD calculated for the DU with replicate sample data;</p> <p>Additional evidence of data acceptance (or rejection) should be provided for decision-making purposes, including site history and potential for contamination above the level of concern, adequacy of methods used in collecting, processing and analyzing samples, closeness of data to screening levels and safety margins built into the screening levels, and other information as available and pertinent.</p> <p>Collection of additional confirmation sampling in DUs where remedial action is necessary required, using samples with a greater number of increments and total, bulk mass and the collection of replicate samples.</p>
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<p>Very Poor (RSD>100%)</p>	<p>Data for all DUs are not reliably representative of the DU mean, including data for DUs where replicate samples were collected;</p> <p>If the majority of the total error is due to subsampling or (less likely) analysis in the laboratory, require the laboratory to reprocess and retest the samples, including milling of samples if necessary, with additional replicate subsamples collected and tested to reassess precision;</p> <p>Review and discuss field sampling methods and laboratory processing and analysis methods and summarize potential sources of error in reports for future reference;</p> <p>Retesting is not required for DUs where the need for remediation is already clear from the data and other field evidence.</p> <p>Consider the collection of new samples in DUs using the following approach: a) If known, designate suspected source areas as separate DUs for individual characterization, b) Collect a minimum of 75 increments per sample; c) Ensure a minimum, 2 to 3 kg final sample mass; d) Collect replicate samples in all anticipated high-concentration and high-risk DUs;</p> <p>As an alternative, consult with a risk assessor trained in MI sampling methods regarding the safety level incorporated into the target screening level or cleanup level and the need to resample high exposure risk areas (e.g., all sample data an order of magnitude or more below screening levels).</p> <p>Additional evidence of data acceptance (or rejection) should be provided for decision-making purposes, including site history and potential for contamination above the level of concern, adequacy of methods used in collecting, processing and analyzing samples, closeness of data to screening levels and safety margins built into the screening levels, and other information as available and pertinent.</p> <p>Collect replicate confirmation samples in all DUs requiring remediation.</p>
---	--



3.9 USING DATA FOR DECISION MAKING

3.9.1 ENVIRONMENTAL HAZARD EVALUATION

After assessing the adequacy of the data quality, data considered acceptable are compared to screening levels pertinent to the investigation questions and targeted environmental concerns or incorporated into a more site-specific, quantitative risk assessment. An Environmental Hazard Evaluation is the link between site investigation activities and response actions, if needed (refer to Figure 3-1). A detailed discussion of Environmental Hazard Evaluation, including EALs, is provided in the HDOH document Evaluation of Environmental Hazards at Sites with Contaminated Soil and Groundwater (HDOH, 2017 and updates). An overview of the document is provided in Section 13.

The collection of site data and the identification of potential environmental hazards are iterative processes. Environmental Hazard Evaluations as well as CSMs should stress fate and transport of COCs. As initial site data indicate potential environmental hazards, the need for additional data to fully define and evaluate the hazards and develop appropriate response actions must be evaluated. The identification of potential hazards early on during site investigation activities, even at a cursory level, can help guide the progression of fieldwork and reduce the need for continual remobilization and collection of additional data.

This might include quantification of cancer risk or noncancer hazard based on site-specific exposure parameters, modeling of potential impacts to groundwater due to leaching or of potential impacts to indoor air due to vapor intrusion or simple inspection of the site in the field to determine if the predicted impacts are indeed occurring (e.g., suspected presence of grossly contaminated soil or groundwater). Additional laboratory testing might also be necessary, including bioaccessibility data for contaminants that pose potential direct exposure risks or batch or soil column leaching tests for contaminants that pose potential leaching concerns.

Identify Main Target Contaminants

The list of contaminants of potential concern can be rapidly narrowed down by comparison of the data to a single screening level for the contaminant that comprehensively address all potential environmental concerns at the site (e.g., HDOH 2017). If the concentration does not exceed the screening value, then can be reasonably assumed that the contaminant will not cause significant environmental harm. If the concentration of a contaminant exceeds the environmental screening value, then additional evaluation is warranted. Contaminants that fail initial screening levels are referred to as “risk drivers.”

Identify Potential Environmental Hazards

Screening field data for the presence of potential environmental hazards as soon it arrives from the laboratory is a critical step in the site investigation process and should not be delayed pending the completion of a formal site investigation report. Refer to Appendix B for examples of potential environmental concerns associated with specific types of chemical contaminants. Common concerns include:



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- Chronic risk due to direct exposure of people by ingestion, dermal contact or inhalation of vapors or dust;
- Toxicity to ecological flora and fauna;
- Uptake into food crops;
- Leaching and contamination of groundwater or surface water;
- Vapor emission into existing or future buildings;
- Short-term risk due to vapor emissions, sheens in runoff, fouling of construction equipment, etc., following exposure of heavily contaminated soil or groundwater.

In the absence of obvious conditions in the field (e.g., explosive levels of soil vapors), the most expeditious approach to identifying potential environmental hazards associated with contaminated soil or groundwater is a direct comparison of site data to the HDOH Environmental Action Levels (see Section 13). If the reported concentration of a COPC exceeds the Tier 1 EAL in the subject media (e.g., soil, soil gas, or groundwater) then the specific environmental hazard(s) potentially posed by the chemical should be identified (see Appendix B).

Exceeding the Tier 1 EAL does not necessarily indicate that environmental hazards are present, only that further evaluation is warranted. Perhaps most importantly, use of the Tier 1 EALs allows site owners/operators, consultants, and regulators to quickly screen out contaminants that do not pose potential concerns and negate the presence of environmental hazards at sites with minimal contamination. This is most easily done using the HDOH EAL Surfer (available for download from the HDOH Environmental Hazard Evaluation web page). If action levels are not available for a targeted contaminant or if available action levels are determined to not be applicable to site conditions, then this potential hazard must be evaluated on a site-specific basis.

As potential environmental hazards are identified, the CSM for the site should be updated and the need for additional sample data evaluated. For example, the identification of elevated levels of lead in soil samples from one area of the site may indicate a need for additional soil samples from that area to better define the extent of contamination. The identification of potential leaching hazards associated with a COPC suggests that batch testing and/or groundwater data may be needed. The identification of potential vapor intrusion concerns suggests that soil gas data are needed.

Applying this type of dynamic and iterative approach to the site investigation process will expedite completion of the investigation and approval by the HEER Office. Screening preliminary data up front allows for a more complete site investigation to be prepared and submitted. This reduces the need for remobilizing months (or even years) after the initial sampling event and the need for multiple and time consuming reviews of site investigation reports by the HEER Office. Informal meetings with a HEER Office project manager or technical support staff person to discuss preliminary data and propose additional actions as the site investigation is being carried out are highly encouraged.



Environmental Hazard Advanced Evaluation

The need for a more advanced assessment of suspected environmental hazards must be determined on a site-specific basis. A concentration of a contaminant in soil or sediment that exceeds a default screening value for a specific environmental hazard does not necessarily indicate that the contaminant poses a significant threat to human health and the environment. Additional evaluation is, however, warranted if justified in terms of the time and cost of the evaluation versus the time and cost of cleanup. In many cases, the most economical treatment of a suspected environmentally hazardous contaminant is to remove or treat DUs that are impacted above a default screening value. A more detailed assessment of the suspected environmental hazard should be carried out if a large clean-up cost is likely to be incurred or if full cleanup is not technically feasible.

A summary of options for site-specific assessment of identified potential environmental hazards posed by contaminated soil is provided in Table 3-6. Options for a more detailed evaluation of potential hazards posed by contaminated groundwater are provided in Table 3-7, since concurrent contamination of both soil and groundwater is often identified.

3.9.2 FOLLOW-UP RECOMMENDATIONS

Recommendations for follow-up actions at the site should be made based on the results of the environmental hazard assessment. This could include initiation of additional field investigations, additional analysis of existing samples (e.g., for bioaccessibility), additional and more detailed assessment of tentatively identified environmental hazards, assessment of alternative remedial actions and/or development of environmental hazard management plans for long-term management of contamination that will be left in place. Site-specific factors to consider include the potential for current versus future exposure, proposed property redevelopment and use, regulatory acceptance and cost-effectiveness of potential remedial actions versus use of engineering and institutional control measures and natural attenuation of pollutants over time. Whenever possible contaminated soil, sediment and groundwater should be remediated to the extent practicable and in a manner that minimizes future restrictions on the site. Potential remedial activities must be discussed and coordinated with the local regulatory agency prior to finalization of workplans or initiation of activities in the field.

If complete a cleanup of contamination is not feasible, the extent and magnitude of residual contamination must be summarized and clearly indicated on to-scale maps of the property. Current and future potential environmental hazards posed by the contamination must be clearly described. Appropriate institutional and engineering control measures must be developed, implemented and monitored for effectiveness. This includes restrictions on future land uses, installation of vapor mitigation systems under buildings, capping of contaminated soil to prevent exposure and/or leaching, and long-term monitoring and control of groundwater.



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Table 3-6. Example methods for site-specific evaluation of tentatively identified environmental hazards associated with contaminated soil.

Environmental Hazard	Example Site-Specific Evaluation Approaches
Direct Exposure	<ul style="list-style-type: none"> • Use of laboratory bioaccessibility tests to better evaluate potential exposure dose and risk. • Calculation of site-specific screening levels with review and approval of overseeing regulatory agency. • Preparation of a site-specific human health risk assessment that considers engineered and institutional controls to eliminate or minimize exposure pathways, alternative exposure assumptions, alternative target risks, etc.
Vapor Intrusion	<ul style="list-style-type: none"> • Collection of soil vapor data to better evaluate vapor intrusion or explosive hazards. • Preparation of site-specific vapor intrusion model.
Leaching	<ul style="list-style-type: none"> • Collection of groundwater data. • Use of laboratory leaching tests to evaluate contaminant mobility and estimate concentrations in source area leachate. • Collection of soil vapor data to estimate VOCs in leachate, leachate fate and transport evaluation.
Impacts to Terrestrial Habitats	<ul style="list-style-type: none"> • Field inspection to determine the presence or absence of potentially significant, terrestrial ecological habits. • Preparation of a detailed ecological risk assessment.
Gross Contamination	<ul style="list-style-type: none"> • Field inspection of petroleum-contaminated soil to evaluate potential gross contamination concerns (especially in existing or planned residential areas).



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Table 3-7. Example methods for site-specific evaluation of tentatively identified environmental hazards associated with contaminated groundwater.

Environmental Hazard	Example Site-Specific Evaluation Approaches
Contamination of Drinking Water Resources (toxicity and/or taste and odor hazards)	<ul style="list-style-type: none"> • Identification and monitoring of nearby, groundwater supply wells and guard wells. • Long-term monitoring of groundwater to evaluate plume migration potential. • Use of groundwater plume fate and transport models in combination with long-term monitoring to evaluate plume migration potential.
Vapor Intrusion	<ul style="list-style-type: none"> • Collection of soil vapor data to better evaluate vapor intrusion or explosion hazards. • Preparation of site-specific vapor intrusion model.
Impacts to Aquatic Habitats	<ul style="list-style-type: none"> • Use of groundwater data to evaluate plume expansion and migration over time. • Use of fate and transport models to predict long-term migration potential of groundwater contaminant plumes.
Gross Contamination	<ul style="list-style-type: none"> • Check groundwater for free product. • Check discharge areas for sheen and other gross contamination concerns.



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3.10 REFERENCES

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**SECTION 4
SITE INVESTIGATION DESIGN AND IMPLEMENTATION: APPENDICES**

Interim Final – July 2023

**State of Hawai'i
Department of Health
Office of Hazard Evaluation and Emergency Response
2385 Waimano Home Rd #100
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TGM for the Implementation of the Hawai'i State Contingency Plan

Section 4 FOWARD

Foreword to Sections 3 and 4 of the HEER Office Technical Guidance Manual

The guidance presented in Sections 3 and 4 of the Hawai'i Department of Health (HDOH), Hazard Evaluation and Emergency Response (HEER) Office represents the collective experience of a large group local, national and international environmental experts trained in Gy's Theory of Sampling. The guidance focuses on the use of "Decision Unit (DU)" and "Multi Increment® Sample" investigation methods for characterization of environmental media. (Multi Increment is a registered trademark of EnviroStat, Inc.). Although primarily focused on soil, the methods introduced are also applicable to the investigation of contaminated sediment and other particulate media. Concepts of Systematic Planning and the use of DUs to design risk-based sampling plans also apply to the investigation of contaminated groundwater and surface water (Section 6) as well as indoor air, outdoor air and subsurface vapors (Section 7).

Section 3 and Section 4 of this guidance replace Sections 3, 4 and 5 of the original (pre-2023) *Technical Guidance Manual* (TGM), with a separate "Section 5" no longer utilized. Copies of the original sections are available for download in the Archives folder of the HEER Office DU-MIS webpage.

The guidance is presented in three parts that reflect different audiences. Appendix A in Section 4 of the guidance provides brief Fact Sheet overviews of DU-MIS. The first fact sheet serves as an introduction to DU-MIS for the general as well as environmental professionals new to the subject. Section 3 of the guidance provides a basic but concise overview of the site investigation process. This section is intended for senior- and management-level staff and as an introduction for field workers. Included is an introductory review of the Theory of Sampling for particulate matter and an overview of the Systematic Planning process and the use of DU-MIS collection methods to rapidly and reliably characterize contaminated land. Section 4 of the guidance is a series of appendices that provide detailed discussions and examples of each aspect of the site investigation process as well as references for additional information. These sections are intended for those tasked with implementation of DU-MIS investigation methods in the field and laboratory as well as assessment of risk and design and implementation of remedial actions.

Reference: HDOH, 2023, *Technical Guidance Manual, Sections 3&4 Site Investigation Design and Implementation*: State of Hawai'i, Department of Health, July 2023 (and updates).

Comments and suggestions for future updates of the guidance are welcome and can be submitted to the HEER Office contact:

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Section 4

ABBREVIATIONS AND ACRONYMS

Abbreviations and Acronyms

°C	Degrees Celsius
cm	Centimeter
CSM	Conceptual Site Model
DNAPL	Dense, Non-Aqueous Liquids
DU	Decision Unit
HIDOH	Hawaii Department of Health
kg	Kilogram
m	Meter
m ²	Square Meter
m ³	Cubic Meter
MI	Multi Increment
MIS	Multi Increment Sample
mm	Millimeter
µm	Micrometer
Multi Increment®	Registered trademark of EnviroStat, Inc.
PCB	Polychlorinated Biphenyl
RSD	Relative Standard Deviation
UCL	Upper Confidence Level (UCL)
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds



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APPENDIX A. DU-MIS FACT SHEETS

APPENDIX A. DU-MIS FACT SHEETS



APPENDIX A. DU-MIS FACT SHEETS

Use of DU-MIS Sampling Methods for Risk-Based Investigation of Contaminated Soil and Sediment

This fact sheet provides government regulators, consultants, property owners and other interested parties with a brief overview of Decision Unit and Multi Increment® Sample (DU-MIS) investigation methods for contaminated soil (Multi Increment® is registered trademarked of EnviroStat, Inc.). This fact sheet is an accompaniment to the “Site Investigation Design and Implementation” sections of the State of Hawai'i, Department of Health *Technical Guidance Manual* (Sections 3 and 4; HDOH 2023). The examples presented focus on soil, but similar approaches are applied to testing of sediment and other particulate media.

What is DU-MIS?

Decision Unit and Multi Increment Sample investigation methods are a risk-based strategy to test soil and determine if contamination poses a potential threat to human health and the environment. The methods were specifically designed to address concerns related to the unreliability of “discrete” sampling methods widely utilized in the environmental industry. The DU-MIS approach can require additional time and effort at the beginning of a project but will ultimately help to:

- Provide a clear endpoint to an environmental investigation;
- Reduce total project duration and cost;
- Ensure sample data collected are reliable and reproducible;
- Provide a higher degree of confidence that potential risks have been identified and addressed;
- Provide confidence that cleanup actions are only conducted where warranted; and
- Avoid unanticipated delays or even abandonment of projects due to time and cost overruns and lack of a clear endpoint.



DU-MIS investigation methods provide greater confidence in decision making and help to complete environmental projects in a reliable time- and cost-effective manner.

These methods apply to nonvolatile and volatile contaminants as well as surface and subsurface soils. Similar sampling methods have been used for decades by the mineral exploration and agriculture industries but are relatively new to the environmental industry, where the error in the representativeness of sample data is less evident.

How is DU-MIS Implemented in the Field?

DU-MIS investigation methods are carried out in a methodical manner that helps increase confidence in the representativeness of the data collected and decisions made based on the data. This step-by-step process,



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APPENDIX A. DU-MIS FACT SHEETS

which includes inspecting the site, talking to people familiar with the site history and compiling existing data, is referred to as “Systematic Planning.” A nine-step process is described in the DU-MIS guidance associated with this fact sheet. Below is a condensed five-step process for ease of explanation.

Step 1: Review the Site History

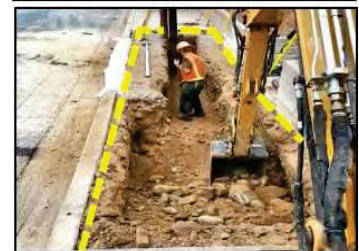
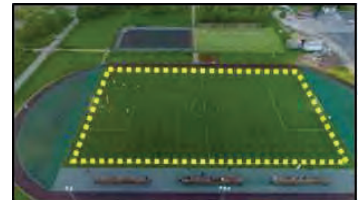
The first step in a “risk-based” investigation is to gain a thorough understanding of the site before samples are even collected. The information is summarized in a preliminary “Conceptual Site Model (CSM).” The CSM is then used to design the site investigation.

Step 2: Designate Decision Units for Sample Collection

The second step is to designate well-thought-out areas of the site, referred to as “Decision Units (DUs),” to be individually tested for contamination. A DU can be thought of as an *area or more specifically volume* of soil or sediment that would ideally be sent to a laboratory for testing as a single sample. Each DU is designated to address a specific site investigation question regarding the assessment of risk to human health and the environment and/or the optimization of potential remedial actions.

Decision Units are set to the size needed to address the questions asked and the objectives of the investigation. A “Decision Statement” is assigned to each DU. This statement specifies the action to be taken when sample data are received and is prepared prior to the collection of a sample. This provides a clear pathway forward for subsequent stages of the investigation once sample data are obtained and helps expedite the overall completion of the project.

Risk-based DUs should be selected based on site history and current potential exposure pathways. *Exposure Area DUs* include unpaved areas where children and adults frequently play or work, such as playgrounds, schoolyards, gardens, open areas of commercial and industrial sites and exposed soil at construction sites. These are a very common components of human health risk assessments. The exact size of an *Exposure Area DU* is site-specific but normally ranges from a few hundred to a few thousand square meters (few thousand to a few tens of thousands of square feet) in area and from one hundred to several hundred cubic meters of soil in volume with the upper 5 to 15 centimeters tested (two to six inches).

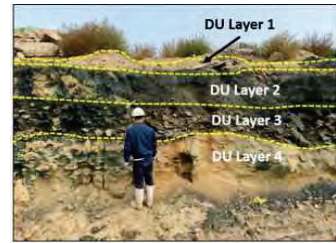


DUs are designated to answer specific risk or remediation questions. The entire property is often tested.

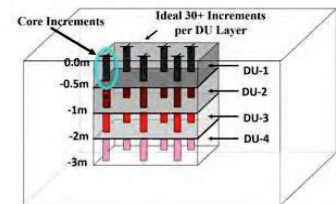


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Areas of known or suspected heavily contaminated soil that are almost certain to pose a risk if exposed at the surface are designated for separate testing to optimize anticipated remediation. These are referred to as *Source Area (or Spill Area) DUs*. *Source Area* DUs are surrounded by anticipated clean *Boundary DUs* to isolate areas of heavy contamination to the extent practicable and cost-beneficial in terms of anticipated remediation needs. Successful remediation of contamination can be verified by designation and testing of *Exposure Areas DUs* in the same locations.



DUs are designated to characterize both surface soil and, as needed, subsurface soil. Subsurface soil is characterized in terms of stacked DU Layers. Suspect layers of subsurface soil, identified by site history, initial surface soil data or other observations, should be designated for separate testing to bound the vertical extent of the contamination. Designation of subsurface DUs is normally done at a scale that will assist in optimization of potential remediation. Testing and documentation of subsurface contamination might also be performed for long-term management purposes to avoid potential excavation of the material in the future and inadvertent reuse on the surface.

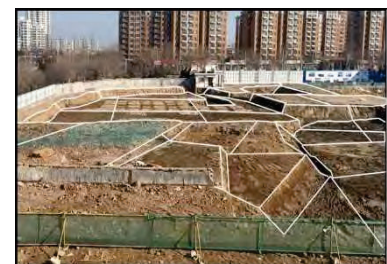


DU Layers are also designated to test subsurface soils.

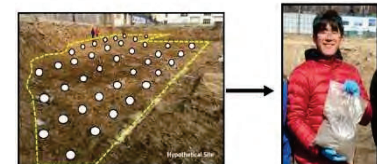
The size and number of DUs designated to characterize a site reflects the “resolution” of the investigation necessary to answer the questions being asked, much like the pixels of a digital photograph. Five to ten DUs are normally adequate to characterize a simple site. Twenty or more surface and subsurface DUs might be required to characterize a complex site.

Step 3: Collect a Representative Sample from Each DU Area

Decisions regarding both risk and remediation are always based on the true concentration of the contaminant for the DU volume of soil *as a whole*. This is often referred to as the “mean” concentration in environmental documents. All data for particulate matter necessarily represents a mean of the collective group of particles tested, however, and use of this term is unnecessary.



Under ideal circumstances the entire DU volume of soil or sediment would be excavated and submitted to the laboratory for testing as a single unit. This is not practical under most circumstances and a representative sample of the material must be collected instead. The science and statistics behind the collection of a representative sample of soil is complex and involves the need to address both variability between individual particles (“compositional heterogeneity”) and variability within the targeted DU (“distributional heterogeneity”). The procedure to collect a sample in the field is, however, relatively straightforward.



A single sample is prepared for each DU by combining small amounts of soil from a large number of points.



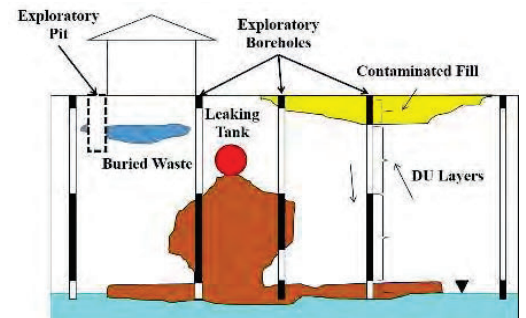
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A single sample is prepared for each DU by collecting and combining small, core-shaped masses of soil from a large number of points within the targeted area. The soil from each point is referred to as an “increment” and the combined increments are referred to as a “Multi Increment (MI)” sample. A minimum of 30 to 75+ increments with a combined mass of 1 to 3 kilogram (kg) is normally required to prepare a reliably representative sample that is to be tested for non-volatile chemicals.

A default of 50 increments per sample is recommended. This will provide reliably representative sample data under most site scenarios based on past field experience and comparison of replicate sample data. Fewer increments might be acceptable for testing of liquid releases (anticipated lower heterogeneity). A larger number of increments is required for contaminants present in the soil as clumps or chips (anticipated higher heterogeneity).

This sample collection method provides a high degree of confidence that the resulting data will be representative of the targeted DU pertinent to the investigation questions being asked. For added certainty, two additional, independent samples are collected from at least one of the DUs. These are referred to as “replicate” samples and are used to evaluate the overall precision of the sampling method and reproducibility of the sample data. Although this adds to the cost of the investigation, replicate samples are critical to demonstrate the reproducibility and defensibility of the data and should always be included in an investigation. Laboratories also collect replicate subsamples for testing in order to document the reproducibility of sample data. Other types of replicate samples, including testing of replicate subsamples from cores, can add to confidence in the quality and representativeness of the data.

Direct-push rigs or excavators can be used to collect increments and prepare MI samples from subsurface DU Layers. If the collection of 50-increment MI samples is not possible due to drilling obstructions or other challenges, then this should be discussed with the overseeing regulatory agency and the limitations of the resulting data should be noted. In some cases, it might be necessary to make decisions based on data for individual borings. The boring itself then becomes the DU, referred to as an “Exploratory Boring DU.” Each targeted interval within the boring becomes an individual DU Layer. If the targeted interval of core is too large to submit to the laboratory for testing, then an MI sample is collected. Data from Exploratory Borings can be useful for a very general estimation of the extent and magnitude of subsurface contamination, especially in the case of subsurface petroleum and solvent releases. Be aware however, that there is a risk of “false negative” results when using this approach and underestimation of the magnitude and extent of contamination. Full DU-MIS testing of the soil is required for confirmation.



Data for individual Exploratory Borings can be very useful for initial investigation of subsurface conditions.

Sample collection methods for volatile chemicals require that separate increments are combined in a bottle containing a pre-measured volume of methanol. Further details on sample collection methods for volatile chemicals are discussed in Appendix I.



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Step 4: Sample Processing and Analysis

Contact the laboratory during the planning phase to ensure that they are experienced in processing and testing of MI samples. Ensure also that the laboratory can achieve the desired reporting limits and data quality objectives. Select analyses that achieve the desired risk concerns and goals. Avoid testing for unneeded unknowns to keep costs under control.

MI samples to be tested for nonvolatile chemicals are dried, sieved and then carefully subsampled.



Once collected, the sample is sent to a laboratory for processing and testing. The laboratory will not be able to test the entire 1 to 3 kg sample. Strict protocols must be followed in order to collect a representative subsample for testing. The bulk field sample is normally air dried for 24 to 48 hours and then passed through a sieve to remove large rocks and other debris and isolate the target particle size (e.g., <2 millimeters). A sectoral splitter is then used to collect a representative subsample (third photo in figure on previous page). Although more prone to error, the sample can also be spread into a thin layer and a subsample is then manually collected from 30 or more points (increments), similar to how the sample was collected in the field.

These steps help ensure that the laboratory data are representative of the sample and that the sample submitted is representative of the targeted DU. The laboratory is required to test two additional replicate subsamples (laboratory “triplicates”) collected from 10% of the samples submitted to test the precision and reliability of the subsampling method. These data are again critical to demonstrate the defensibility of the data and should always be included.

Step 5: Data Review and Decision Making

When the laboratory data are received, a review of the overall reliability of the data is made based on field and laboratory replicate samples and other quality control measures. If the replicate data are very different and the problem is determined to be at the laboratory, then retesting of the samples might be required. If the problem is determined to be related to the method used to collect the samples in the field, then the sampling process will be reviewed and the collection of new samples might be required. Field error is often due to the presence of previously unidentified, highly heterogeneous source areas within the initially targeted DU. Error associated with sample collection and laboratory testing decreases as experience is gained.

Once the data are determined to be usable, the data for each DU can be directly compared to risk-based screening levels applicable to the investigation question(s) of interest and decisions can be made on the need for cleanup or other soil management actions. The need to collect additional samples should be minimal, assuming that DUs were appropriately designated at the beginning of the project and DU questions and decision statements were properly prepared ahead of time.



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Why are DU-MIS Sampling Methods Necessary?

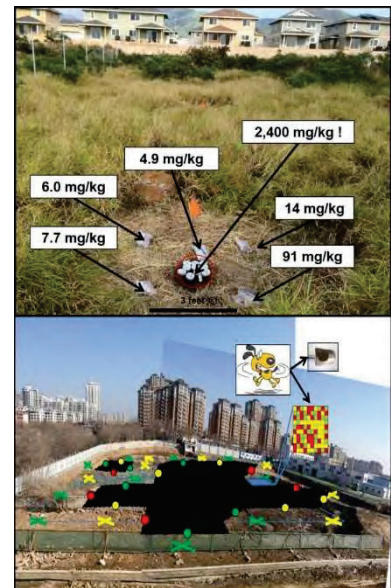
Guidance for the investigation of contaminated sites published by the USEPA in the 1980s focused on the collection and testing of individual, small masses of soil from single points referred to as “discrete” samples. The authors noted that this method would only be reliable if the concentration of a contaminant in soil was very uniform both within a sample and between closely spaced samples.

Scientists and field workers began to warn in the early 1990s that this was not the case. Data for co-located samples often varied widely and randomly, as did data for duplicate subsamples tested by the laboratory. This caused confusion in the field regarding the extent of contamination above levels of potential concern and in the assessment of risk. The need to repeatedly remobilize field teams for sample collection and the discovery of additional contamination after remediation was thought to be completed, caused some projects to be delayed for years and in some cases to be abandoned due to the lack of a clear endpoint.

A thorough field study of the reliability of discrete sample data for testing of environmental sites was, surprisingly, not carried out until 2015 – thirty years after the first USEPA site investigation guidance was published (Brewer et al. 2017). The field study verified contaminant concentrations can vary dramatically and randomly between samples collected just a few centimeters from each other and even within an individual sample. Statistical analysis of independent (replicate) sets of discrete samples can predict very different mean contaminant concentrations and associated risks for targeted exposure areas. These factors are the primary cause of project completion delays, cost overruns and the later discovery of significant contamination in areas previously declared to be “clean.”

The mineral exploration and agricultural industries recognized the same problems many years ago. Gold exploration companies often went bankrupt when the amount of gold initially estimated to be presented in stockpiles of crushed ore, based on traditional sampling methods accepted at the time, proved dramatically different from the mass of gold ultimately extracted from the ore after selling it to a processor. Farmers realized the unreliability of discrete sample data very quickly, as crop yields failed to meet expectations or large sums of money were unnecessarily spent on fertilizer or other field amendments.

The result was the development of the Theory of Sampling by Pierre Gy in the 1950s. The Theory of Sampling serves as the basis of the DU-MIS methods described in this fact sheet. Errors in sample data and decision making are less obvious in the environmental industry, but DU-MIS methods are continually improved to make the investigation, assessment and remediation of contaminated soil as efficient and reliable as possible.



Contaminant concentrations can vary dramatically between co-located, discrete samples and even within the same sample, causing significant confusion in the field.



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Where can I get more information?

Brewer, R., Peard, J. and M. Heskett. 2017. A critical review of discrete soil sample reliability, (two parts): Soil and Sediment Contamination, Vol. 26 (1).

HIDOH, 2023, *Technical Guidance Manual, Sections 3&4 Site Investigation Design and Implementation*: State of Hawai'i, Department of Health, July 2023 (and updates).



Appendix A: DU-MIS Fact Sheets

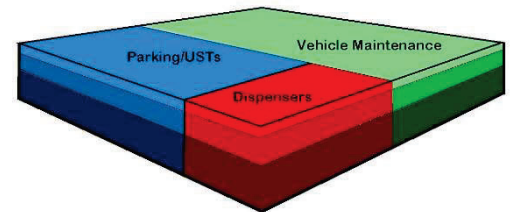
FACT SHEET #2: Sampling Plan Essentials for Responsible Parties

Samples of soil, soil vapors, surface water are sometimes required as part of a property transaction or to cleanup known or suspected contamination. The resulting sample data are normally compared published “action levels” or “screening levels” to determine if contamination that mire require cleanup is present.

A Sampling and Analysis Plan (SAP) is prepared by an environmental consultant and tailored specifically for your project. It is unique to your property and can be customized to your timeline and budget. An SAP is only as good as the objectives it’s based on, however. Review and approval of the SAP by the overseeing regulatory agency is sometimes required. In other cases, the agency might only review the report that summarizes the results of the sampling. It is important to have a clear idea of your regulatory and other needs before samples are collected. If your plans or objectives change, then your consultant will need to update your SAP.

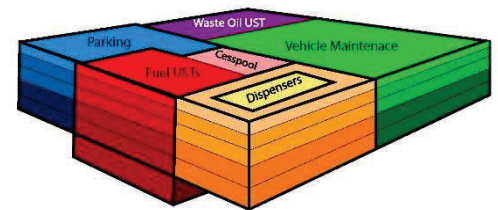
Option 1: Quick and Cost-Effective Screening

- Property divided into a small number of “Decision Units (DUs)” for sample collection based on past and current use.
- Relatively cheap and fast - ideal for initial screening.
- Can provide advanced warning for unexpected cleanup costs.
- Adequate to assess direct-exposure risk for commercial land use.
- Easily adjusted to meet excess soil reuse or disposal data needs.



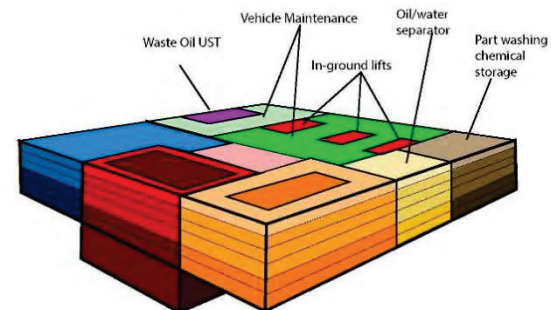
Option 2: Sampling for Minimum Property Use Restrictions

- Property divided into a larger number of smaller DUs.
- Improved resolution allows for potential unrestricted property use and offsite reuse or disposal of excess soil.
- Provides quantitative data to support property valuation and transaction decisions.
- Results can be used to estimate cleanup cost and guide initial actions.



Option 3: Sampling for Cleanup Savings

- All localized areas of known or suspected contamination designated as separate DUs for sample collection.
- Isolates areas of contamination for preparation of remedial plan and optimization of cleanup time and cost.
- Minimizes the need for additional mobilization to collect samples.
- Helps control quantities of soil requiring treatment or disposal.



Figures and Fact Sheet template provided by K2 Environmental Professionals



Tips for Adapting Your Sampling Plan

1. Large Decision Units (DUs) are usually only used for screening purposes. Smaller DU areas are normally needed to optimize cleanup and control costs for soil treatment, disposal and re-use.
2. While your consultant can adapt your SAP to meet your specific needs (see table below), if large DUs are initially designated for testing and contamination is discovered, then smaller DUs and additional rounds of sampling using smaller DUs might be necessary to optimize cleanup costs.
3. It is always best to get started early and to get input from the overseeing regulatory agency as you go. Be aware, however, that staffing limitations and time constraints might preclude formal review and approval of an SAP. It is therefore important to work with your consultant to ensure that the data collected will meet the needs of the regulatory agency for review and approval of investigation and cleanup of the property.

Action	Initial Investigation		Later Cleanup Actions
	Save Money	Save Time	Increased Likelihood of Additional Sampling?
¹ Optimize DU number and size for potential cleanup	No	No	No
² Increase DU size & decrease number of DUs	Yes	Yes	Yes
² Reduce number of increments, particularly for deep investigations that require drilling	Yes	Yes	Yes
² Stage investigation over multiple mobilizations	Yes	No	No
³ Hold deeper samples pending initial sample results	Yes	No	No
³ Hold contingent analyses pending initial sample results	Yes	No	No

¹Option 3 above. Potential to save overall time and cost if contamination known or suspected due to reduced cleanup costs/mobilizations; costs more/takes longer up front.

²Options 1 & 2 above. Potential to spread out and/or save on initial investigation costs; may end up costing more/taking longer overall if unanticipated contamination identified and cleanup required.

³Additional approaches can be taken by experienced consultants to reduce the cost of investigation and cleanup actions, although more time might be required to complete the project.

It can be tempting to do less sampling up front with the hope of saving time and money. But beware – if your SAP doesn't support the project objectives, you'll end up paying more in the long run through additional mobilizations, sampling events, and regulatory red tape later on. While a bit counterintuitive, it's often more cost-effective to invest in more sampling early in the project. This will speed up review of final reports by the regulatory agency and minimize the amount of soil that requires special handling, you'll cut down on loading, hauling, disposal and other cleanup costs.



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The Conceptual Site Model (CSM) prepared during the first step of the systematic planning is a comprehensive representation of site environmental conditions with respect to recognized or potential environmental hazards. The CSM is continuously updated as the site investigation progresses, and the site conditions are better understood.

A basic understanding of contaminant migration pathways and exposure pathways is necessary to formulate a CSM and to guide site investigation and response actions, including preparation of remedial actions and/or long-term management plans. Preparation and submittal of a formal, detailed CSM, however, is generally only required at sites where significant contamination exists and cleanup activities are anticipated to take more than a year to complete.

B.1 SUMMARIZE KNOWN SITE CONDITIONS

The first step in the preparation of a CSM is to summarize current site conditions. At the most basic level, this includes a summary of the known or suspected extent and magnitude of soil and groundwater contamination. In addition, site conditions such as land use, groundwater use, potential onsite and offsite receptors, exposure or isolation of contaminated soil, etc., are identified, as are specific environmental hazards that might be posed by the identified contamination.

B.2 SCREEN FOR POTENTIAL ENVIRONMENTAL HAZARDS

A basic understanding of potential environmental hazards in terms of the environmental fate and transport of contaminants of potential concern (COPCs) targeted for a site is important for development of a CSM and subsequent stages of an investigation. As discussed in Section 3.2.2 and in Appendix C, the designation of DUs is intricately tied to the type of environmental hazard(s) posed by the COPC.

Common environmental hazards associated with contaminated soil and groundwater include as follows (Figure B-1):

- Long-term chronic risk to humans caused by long-term direct exposure to contaminants in soil, sediment, water or air;
- Short-term acute risk to humans caused by strong vapor emissions from temporary exposure of heavily contaminated soil or groundwater.
- Chronic and acute risk posed to terrestrial and aquatic ecological receptors.
- Intrusion of vapors from soil or groundwater into overlying buildings.
- Leaching of contaminants from soil and contamination of groundwater or surface water; and
- Short-term risk of fire, strong vapor emissions, odors, sheens in stormwater runoff, fouling of construction equipment and other gross contamination problems related to widespread petroleum contamination.

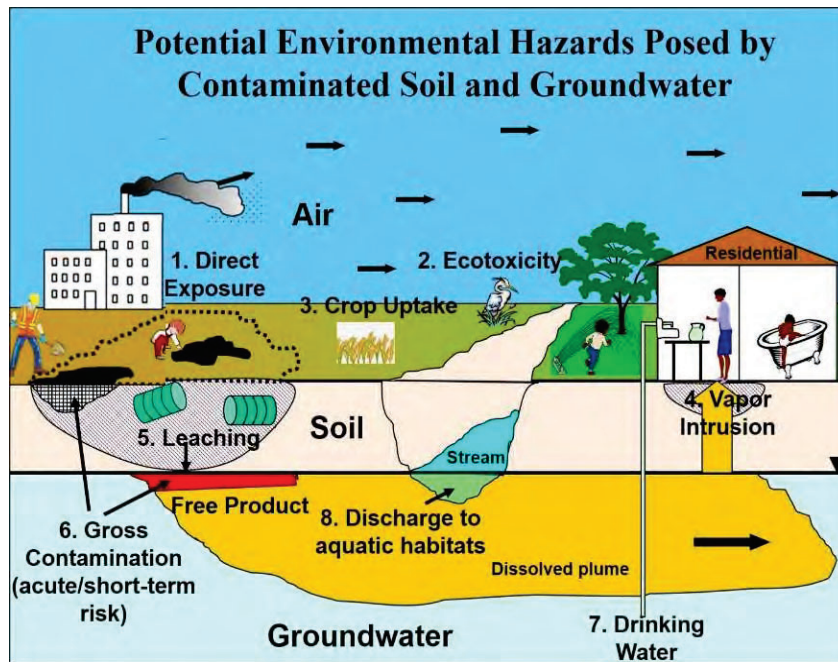


Figure B-1. Common environmental concerns posed by contaminated soil and groundwater.

Potential concerns are identified by comparison of site data to pertinent screening criteria or the use of models to estimated risk based on predicted contaminant fate and transport and receptor exposure scenarios.

Environmental risk is always assessed based on the true (“mean”) concentration of the targeted contaminant for a designated area and volume and soil as a whole, rather than at discrete points (USEPA 1987, 1988a, 1989a,b,c,d, 1991, 1992, 2014).

B.3 DEFAULT CONCEPTUAL SITE MODELS

Default CSMs can provide a useful starting point for the preparation of site-specific CSMs and might be required by some regulatory agencies. It is important that the CSM takes into consideration all potential environmental concerns relevant to the subject site. Site-specific factors such as current and anticipated land use, the utility of underlying groundwater and the potential for contaminated groundwater to discharge into a nearby aquatic habitat must also be taken into consideration. The rationale for excluding specific concerns should be clearly discussed in the report.

The default CSMs can also be depicted in a more classical "risk assessment" format, as presented in Figure B-2. The hypothetical site is contaminated with petroleum from leaking aboveground storage tanks (ASTs), underground storage tanks (USTs), pipelines, drum storage areas and disposal areas. As a default, the site is assumed to overlay groundwater that is a source of drinking water and be adjacent to a surface water body with impacted soil exposed at surface.



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Figure B-2. Default Conceptual Site Model for a petroleum-contaminated site.

Primary Sources	Primary Release Mechanism	Secondary Sources	¹ Potential Environmental Hazards		² Hazard Present Under Current or Future Site Conditions?		Comments
					Current	Future	
ASTs, USTs, pipelines, drums, disposal areas, etc.	Spills, leaks, improper disposal	Soil	³ Risk to Human Health	Direct Exposure	YES	YES	
				Vapor Intrusion into Buildings	YES	YES	
			⁴ Risk to Terrestrial Ecological Habitats		YES	YES	
			⁵ Leaching		YES	YES	
			⁶ Gross Contamination		YES	YES	
		Groundwater	⁷ Risk to Human Health	Direct Exposure	YES	YES	
				Vapor Intrusion into Buildings	YES	YES	
			⁸ Risk to Aquatic Ecological Habitats		YES	YES	
			⁹ Gross Contamination		YES	YES	

CSM assumptions:

1. Example potential environmental hazards (modified on a site-by-site basis as appropriate).
2. All listed hazards assumed present or potentially present and exposure pathways complete under current or future site conditions in the example.
3. Human health hazards include direct exposure to contaminated soil or vapors and dust from soil in outdoor air as well as the intrusion of subsurface vapors into overlying buildings.
4. Assumes a significant terrestrial, ecological habitat is impacted by the contamination with resulting toxicity to flora and fauna.
5. Assumes potential leaching of contaminants from soil and impacts to underlying groundwater.
6. Gross contamination hazards for soil include short-term, high-concentration emissions of hazardous vapors (e.g., during subsurface utility or construction work), potential fire and explosive hazards, sheens in stormwater runoff, fouling of equipment and related concerns.
7. Human health hazards based on ingestion of contaminated groundwater as well as exposure via dermal absorption and vapor emissions during indoor use of water.



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8. Assumes discharge of contaminated groundwater into an aquatic habitat.
9. Gross contamination hazards for groundwater include potential taste & odors concerns for drinking water, presence of free product, explosive hazards, odors, sheens, interference with construction work and other related concerns.

B.4 ADVANCED SITE CONCEPTUAL MODELS

The template CSM presented in Figure B-2 is designed to be conservative and suitable for use in preliminary screening of a site. The CSM can be modified on a site-specific basis to more accurately reflect and assess potential environmental hazards under current and future site conditions.

Risk and cleanup needs are assessed based on the current and anticipated future use of the property. An assessment of requirements to remediate a site to unrestricted use (e.g., residential, schools, etc.) should always be included, even if the expected site use for the foreseeable future is only for commercial/industrial purposes. This will help ensure that formal restrictions are put in place to prevent inappropriate redevelopment of the property in the future as well as minimize unnecessary restrictions on the property should it already meet criteria for unrestricted reuse. The assessment might include a simple statement that additional investigation is required to clear the property for more sensitive uses. It could also include more detailed testing beyond what is called for to assess commercial/industrial use, such as the use of smaller DUs and comparison of data to both screening levels applicable to unrestricted land use and commercial/industrial land use.

Remediation to unrestricted use of the property is oftentimes only nominally higher in terms of cost than for commercial/industrial. In general, actions to address remediation of contaminated soil are financially manageable when the cost of the remediation is less than 10% of the total property redevelopment cost. Heavily contaminated sites are most effectively cleaned up by incorporating remedial actions into a large, redevelopment project.

Site-specific CSMs can be prepared by modifying the default CSMs to more closely evaluate potential environmental hazards under current and anticipated future site conditions. A more detailed CSM is generally warranted at sites where cleanup costs could be significant or at sites where long-term management of contaminated soil or groundwater will be required. A closer evaluation of current and future risks to human or ecological receptors will be particularly important. These types of CSMs will typically identify site-specific sources of contaminant releases, types of contaminated media, migration pathways, exposure pathways, and human and/or ecological receptors.

Figure B-3 presents a more site-specific CSM for the same hypothetical commercial/industrial site contaminated with petroleum. The CSM includes the following site assumptions:

- Contamination is restricted to the site boundaries;
- Area of contaminated soil is paved;
- Underlying groundwater is not a current or potential source of drinking water; and
- Site is located more than 150 m from the nearest surface water body.



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Figure B-3. Expanded, site-specific Conceptual Site Model.

Primary Sources	Primary Release Mechanism	Secondary Sources	¹ Potential Environmental Hazards	² Hazard Present Under Current or Future Site Conditions?									
				Exposure Type	Secondary Release Mechanism	Exposure Route	Receptors						
³ Risk to Human Health	Direct Exposure	Ingestion	On-Site Workers				Offsite Residents		Construction Workers				
			⁴ Vapor Intrusion into Buildings	Vapors	Inhalation	Current / Future	Current / Future	Current / Future	Current / Future	Current / Future	Current / Future		
ASTs, USTs, pipelines, drums, disposal areas,	Spills, leaks, improper disposal	Soil				*No	*No	*No	*No	*No	*No	Yes	Yes
			*No	*No	*No	*No	*No	*No	Yes	Yes			
			*No	*No	*No	*No	*No	*No	Yes	Yes			
			Yes	Yes	No	No	na	na					
			⁵ Risk to Terrestrial Ecological Habitats				Current - No (no habitat or receptors)				Future - No (no habitat or receptors)		
		⁶ Leaching				Current - Yes (soil in contact with groundwater)				Future - Yes			
		⁷ Gross Contamination				Current - Yes (potential explosive vapors)				Future - Yes (potential explosive vapors)			
		Ground-water	⁸ Risk to Human Health	Direct Exposure	none	Ingestion	No	No	No	No	Yes	Yes	
							Dermal	No	No	No	No	Yes	Yes
								Inhalation	No	No	No	No	Yes
⁴ Vapor Intrusion into Buildings	Vapors			Inhalation;	Yes	Yes	No		No	na	na		
⁹ Risk to Aquatic Ecological Habitats				Current - *No (monitoring shows plume not migrating)				Future - *No (monitoring shows plume not migrating)					
¹⁰ Gross Contamination				Current - Yes (free product present)				Future - Yes (while free product present)					



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Figure B-2 (cont.). Expanded, site-specific Conceptual Site Model.

CSM Assumptions:

1. Default environmental hazards to be initially evaluated.
2. Hazard evaluation results based on assumption that contaminated soil is capped with pavement and contaminated groundwater is not migrating (e.g., naturally or via storm sewers, dewatering, etc.). *Long-term management of contamination must be addressed in a site-specific Environmental Hazard Management Plan in the absence of full cleanup.
3. Exposure pathways for daily workers not complete *provided site remains paved. Potential exposure of construction workers during future subsurface activities.
4. Recommend collection of soil gas data to further evaluate potential explosive hazards and vapor intrusion hazards.
5. No significant terrestrial, ecological habitat located on site or threatened by contamination.
6. Assumes contaminated soil is in direct contact with groundwater. Used to support collection of groundwater data for further evaluation.
7. Recommend remediation of gross contamination at a minimum to reduce vapor concerns.
8. Assumes groundwater is not used as a water supply and monitoring indicates that plume is not likely to migrate offsite under natural conditions.
9. Threat to aquatic habitats assumed insignificant *provided plume is not allowed to migrate offsite. Contaminants screened using acute, aquatic toxicity action levels.
10. Recommend removal of free product to extent practicable to reduce vapor concerns and continued source of contaminants to groundwater.



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A "Yes" in a cell under "Receptors" indicates that the noted exposure route is complete or potentially complete. This is important information for development of short-term or long-term response actions to address human health or ecological risk concerns.

The CSM documents that the ingestion, dermal absorption and inhalation pathways for direct exposure to the contaminated soil are incomplete for daily on-site workers. Although the inhalation pathway could in theory still be complete, the presence of the pavement can reasonably be assumed to make this pathway insignificant. For construction workers, however, all direct-exposure pathways are considered complete because their work might involve removing pavement and disturbing contaminated soil.

The CSM indicates that the pathway for leaching of contaminants from soil and contamination of groundwater is complete, because contaminated soil is in direct contact with groundwater, even though the area is assumed to be capped with pavement. This is used to support the collection of groundwater data to evaluate impacts and potential concerns more directly. Removal of pavement could also exacerbate leaching and groundwater contamination due to infiltrating rain or irrigation water. This could require maintenance of an impermeable cap over the contaminated soil as part of a long-term management plan prepared for the site.

The CSM can be used to support a conclusion that contaminated soil and groundwater does not pose unacceptable environmental hazards under current site conditions. Depending on planned uses, active remediation to eliminate future environmental hazards under any potential land use condition could be recommended or required. If active remediation is not practicable due to current site use and conditions and/or financial constraints, the assumptions used in the CSM to support an absence of potential hazard under current site conditions can be used to develop a plan for long-term management of soil and groundwater. This is referred to as an "Environmental Hazard Management Plan (EHMP)." In the example, the EHMP would require that the area of contaminated soil remains capped, that a health and safety plan and soil and groundwater management measures be developed prior to any subsurface construction activities at the site, and that the need for long-term monitoring of groundwater be further evaluated.

Additional information on the development of CSMs is available in USEPA's Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA (USEPA 1988b) and USEPA's Data Quality Objectives Process for Hazardous Waste Site Investigations (USEPA 2000). Note that examples of CSMs in these guidance documents often focus on human health or ecological risk assessment concerns and might not consider other potential environmental hazards, including leaching and potential contamination of groundwater. The examples in the documents also might not reflect the transition to DU-MIS investigation methods.

B.5 MAINTAINING AND UPDATING THE CONCEPTUAL SITE MODEL

The CSM should be maintained and updated as needed throughout the life of the site activities. As appropriate based on additional site information, refine the CSM to more accurately identify known or suspected sources of contamination, types and concentrations of contaminants detected at the site, potentially contaminated media, potential environmental hazards, potential exposure and migration pathways, potential human and environmental receptors, and related information.

Information that should be used to maintain and continuously update the CSM includes (along with other relevant information):



- Identification of new or recently identified surface structures, subsurface utilities or other changes that might affect subsurface conditions, preferential pathways and risk to onsite or offsite receptors;
- Location of additional monitoring wells and past soil borings;
- Inclusion of additional soil, soil vapor or groundwater data;
- Updated soil, groundwater and soil vapor summary figures pertinent to the site with DU areas that exceed screening levels for specific environmental concern highlighted (referred to as Environmental Hazard Maps);
- Updated direction of groundwater flow, depth to groundwater, etc.;
- Updated cross sections that depict the site stratigraphy as well as the lateral and vertical extent of contamination; etc.
- Updated maps that depict DU areas that exceed screening levels or target risks for specific environmental concerns (referred to as Environmental Hazard Maps); and
- Consideration of data for advanced evaluations of specific environmental hazards (e.g., soil bioaccessibility data, soil vapor or indoor air data for assessment of vapor intrusions risks, etc.).

Significant changes to the CSM might necessitate updates to Decision Statements (Step 5 of Systematic Planning), the Sampling and Analysis Plan (Step 6 of Systematic Planning) and/or the plan for long-term management of contaminated soil and groundwater.



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APPENDIX C. EXAMPLE DECISION UNIT DESIGNATION SCHEMES



APPENDIX C. EXAMPLE DECISION UNIT DESIGNATION SCHEMES

This Section provides example Decision Units (DUs) for commercial/ industrial, residential, school, large area, subsurface, stockpile, and sediment sites. The examples reflect experience from actual projects but are not necessarily exact reproductions of any single project. The DUs depicted are for example only. Alternative DU configurations could be equally valid based on knowledge of the site, experience of the field team and the objectives of the investigation.

C.1 Commercial and Industrial Sites

C.1.1 Small Spills

Figure C-1 depicts a small Source Area DU (15 m²) for a suspected release of PCB oil at the edge of a former transformer pad. Staining on the pad suggested that it sloped to the side of where the DU was designated. An area extending approximately one meter out from the pad was designated for sample collection. Soil from 0 to 15 cm depth was targeted for sample collection. Triplicate 75-increment Multi Increment (MI) samples were collected. The flags denote the location of increments collected for the first sample (all flags not shown).



Figure C-1. Decision Unit designated to investigate PCB contamination beside former transformer pad. Boundary DUs to confirm edges of contamination.

Three Boundary DUs were designated immediately adjacent to each the edge of the Source Area DU in anticipated clean soil in order to isolate contamination, if identified. Soil contaminated above a screening level appropriate for unrestricted reuse of the site will be excavated and disposed of in a regulated landfill. A similar confirmation sample would then be collected from the base of the excavation.

C.1.2 Commercial/Industrial Sites

Figure C-2 depicts DUs designated for a former electric power plant. A review of the site history, historical aerials and past discrete sample data suggested potential significant contamination of soil with PCBs in the area of the property where transformers were formerly stored and repaired. Three relatively small Source Area DUs were designated across this area (average 100 m²). A fourth larger Source Area DU was designated



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adjacent to these DUs in area where moderate contamination was possible. Small Boundary DUs were designated along the property boundaries of the suspect release area to potentially confirm an outer boundary of clean soil. The remainder of the property was divided into larger Exposure Area DUs appropriate for the current commercial use of the property. Significant PCB contamination was not anticipated in these areas.

The investigation team concurred that the designated DUs would provide high data resolution for areas



Figure C-2. Designation of Source Area (red) and Exposure Area (blue) DUs at a former electrical power plant to determine the magnitude and extent of PCB-contaminated soil. Former transformer storage and repair operations located in upper left area of the property.

anticipated to require remediation while addressing potential direct exposure across the remainder of the site. Soil from 0 to 15 cm depth was targeted for initial sample collection. Subsurface DU layers were to be designated in areas where PCB contamination was identified, with the resulting data to be used to design and optimize remedial actions.

C.1.3 Chemical Mixing and Storage Sites

Decision units designated for a former agricultural pesticide storage and mixing area are depicted in Figure C-3 and C-4. Relatively small (10 to 200 m²) Source Area DUs were designated in the former mixing tank area to evaluate potential leaching hazards posed by the triazine herbicides ametryn and atrazine (depicted in red, Figure C-3). The DUs were designated based on obvious or suspected areas of high contamination. For example, obvious or suspected release areas were identified on the ground under elevated mixing and storage tanks, under the floor or the storage building and in a low-lying drainage area adjacent to the tanks and building (Figure C-4). The use of small DUs helped assess potential leaching hazards from this area as well as optimized future remediation actions by minimizing the volume of potentially clean soil included in the DUs. The remainder of the mixing area, where low to moderate contamination was anticipated, was divided into larger Exposure Area DUs.



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Figure C-3. Example Source Area DUs (red), Exposure Area DUs (blue), and Boundary Area DUs (blue, outside ring) designated for investigation of a former pesticide mixing and storage area.

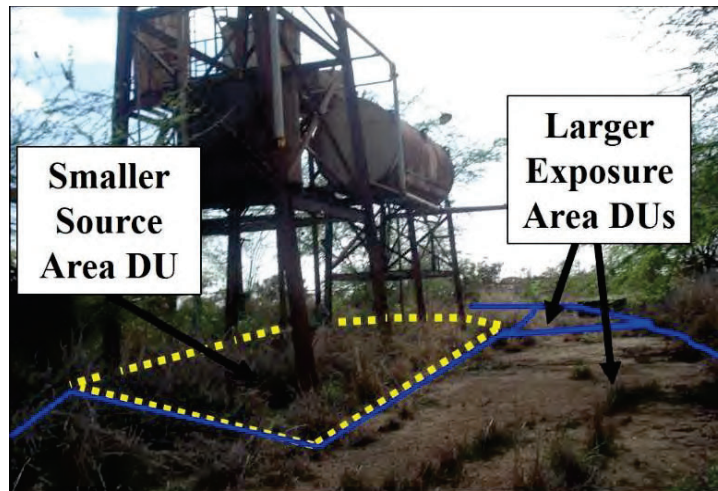


Figure C-4. Example Source Area and Exposure Area DUs designated in a former pesticide mixing area.

The upper 1 to 15 cm of soil were initially tested in all DUs. The upper 0.5m of soil was removed in Exposure Area DUs where contamination above screening levels was identified, with confirmation samples collected from the floors of the excavations. Heavy contamination identified under the tank area was later targeted for a more detailed subsurface DU-MIS investigation (see Section C-7).



C.1.4 DU Designation Based on Redevelopment Plans

Figure C-5 depicts DUs for a proposed hotel development on a two-hectare site known to be contaminated with arsenic. The property was divided into four DUs, based on the proposed redevelopment layout and the suspected original location of a former arsenic mixing area. DUs A through C represent exposure areas in anticipated cleaner areas of the property. A smaller Source Area DU (DU-D) was designated in the suspect mixing area in order to help isolate soil anticipated to be most heavily contaminated and optimize remediation cost.

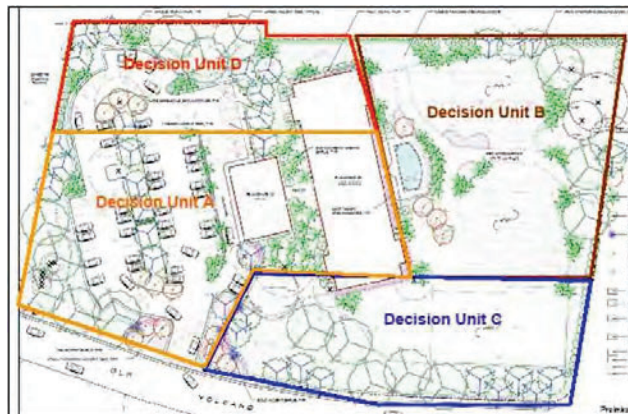


Figure C-5. Decision Units to Investigate a Proposed, Four-Acre Hotel Site DUs A through C represent exposure areas based on the proposed hotel design. DU-D represents a suspected source area identified during initial site investigation actions.

Soil in DUs that failed the cleanup level for arsenic was to be excavated and disposed of at a regulated landfill. A series of subsurface DU layers was designated in DU-D to a depth of three meters to identify the depth of contamination and to serve as confirmation sample data for anticipated soil removal. The upper 0.5 m of soil was to be removed in DUs A-C if the cleanup level was exceeded, with follow-up confirmation samples to be collected from the floors of the DUs. Confirmation samples were to be screened in the field with a portable XRF prior to submittal to a laboratory to expedite soil removal and completion of the project.

C.2 SINGLE-FAMILY HOMES

Soil contamination concerns associated with residential properties often focus on the presence of lead-based paint residue around the immediate perimeter of homes constructed prior to the mid-1970s. Soil under and around homes constructed prior to this time might also have been treated with organochlorine termiticides (e.g., Technical Chlordane) or even arsenic.

Figure C-6 depicts typical DU designation to investigate these potential concerns. A narrow Source Area DU (or DUs) was designated around the immediate perimeter of the home, typically within 1.0 m to 1.5 m out of the foundation. This could also be classified as an Exposure Area DU, since landscaping and other attractions around the perimeter of a house can attract young children. There is high confidence that the DU will capture any contamination present based on experience at other homes, and additional, Boundary DUs to help



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confirm the boundary with clean soil are assumed to not be necessary. The remainder of the yard was designated as a single large Exposure Area DU. No contamination in this area is anticipated. The upper 0 to 15 cm of soil was targeted for sample collection.

Soil that exceeds target, residential screening levels is to be excavated and removed, and a confirmation



Figure C-6. Example designation of Source Area DUs around the perimeter of a house and a large, Exposure Area DU for the yard.

sample collected from the floor of the excavation. Each side of the house could be designated as a separate DU for testing if there is a reason to think that these areas could be different. Landscaping or a small garden might be present one side of the house. The side of the house that faces the sun most of the day might be more susceptible to weathering of lead-based paint. Multiple DUs could similarly be designated for the yard if areas of the yard are used for different purposes and could be classified as separate exposure areas (e.g., play areas or garden areas).

A proper MI sample could not be collected under the slab of the house due to the absence of a crawl space and the effort required to penetrate the slab and avoid utilities. As an alternative, soil cores representing DU layers were collected and tested from three Exploratory Boreholes drilled through the slab (0 to 25 cm, 25 to 50 cm, 50 to 100 cm; refer to Section 3.6.4.2). Data from the cores was to be used to establish the presence, but not necessarily the absence of treated soil under the slab. The slab area was later designated as a separate DU and tested following demolition and removal of the structure (refer to Example C.7.3).

Separate testing of each structure might not be practicable or necessary for characterization of large neighborhoods where dozens or even hundreds of houses are scheduled for demolition (e.g., large military bases). In such cases, the neighborhood can be divided into clusters of homes constructed during the same time period and by the same builder, or otherwise with the assumption that the use of lead-based paint or termiticides around the buildings would be similar. Detailed characterization could be carried out for a select number of buildings within each cluster (e.g., 10-20%). The results can then be applied to the remainder of the buildings to prepare initial soil management plans. More detailed testing can be carried out as needed to confirm conclusions drawn from the initial data. This includes testing of stockpiled soil prior to reuse or disposal.



C.3 HIGH-DENSITY HOUSING

The investigation of large, high-density residential areas for potential soil contamination concerns is approached in a similar manner as done for individual homes. Suspect source areas of significant contamination are targeted as separate Source Area DUs for characterization. The remainder of the property is divided into larger, Exposure Area DUs.

Figure C-7 depicts DUs designated for a public housing complex suspected of being constructed in an area where pesticides were mixed and stored in the past. Soil immediately adjacent to a retaining wall at the bottom of the edge of the complex was anticipated to be at greatest risk of contamination. Small 50 to 100 m² Source Area DUs were designated along the retaining wall based on the location of apartment patios and use of the area for landscaping or small gardens (DUs 1, 2, 3, 8, and 12). Larger, Exposure Area DUs based on open, grassed areas or play areas were designated around nearby buildings.

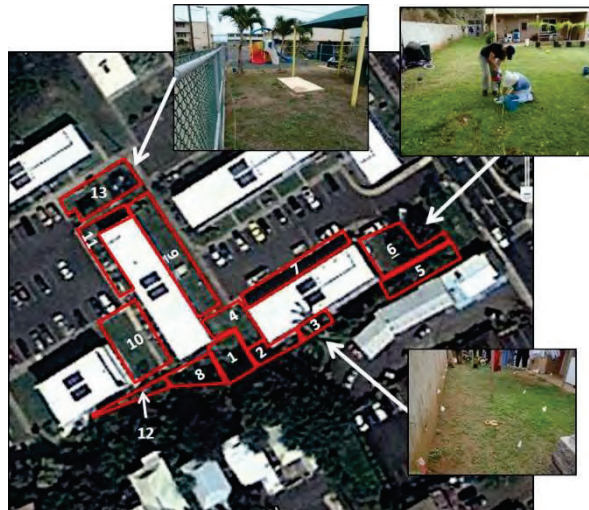


Figure C-7. Example designation of DUs for investigation of pesticide-contaminated soil at a public housing complex.

The upper 0 to 15 cm interval of soil was targeted for initial sample collection. Due to the ongoing use of the complex for housing, DU areas with concentrations of pesticides that exceed residential screening levels were to either be capped with clean soil or, where feasible, the upper one foot of soil removed and replaced with clean soil. Testing of soil under buildings was to be carried out in the future when redevelopment of the property takes place.



C.4 SCHOOLS

Designation of DUs for characterization of potential soil contamination at schools typically represents a combination of approaches used for commercial/industrial facilities and high-density residential complexes. Designation of Source Area and Exposure Area DUs for sample collection might include potential lead-contaminated or termiticide-treated soil around perimeters of older buildings, garden areas where persistent pesticides might have been used in the past, barren areas of soil in areas frequented by children and staff and areas where soil is discovered to contain pieces of wire, porcelain, melted glass and ash indicative of past burning.

Figure C-8 depicts DUs designated for a school to test for the presence of lead-contaminated soil associated with burning and dumping prior to construction of the campus. The lower campus area is especially considered at risk of contamination. A soccer/football field, school garden and an area under trees where students congregate are designated as separate Exposure Area DUs. Soil in a second area under trees where students congregate is discovered to contain bits of porcelain and melted glass and is designated as a combined Source Area-Exposure Area DU.

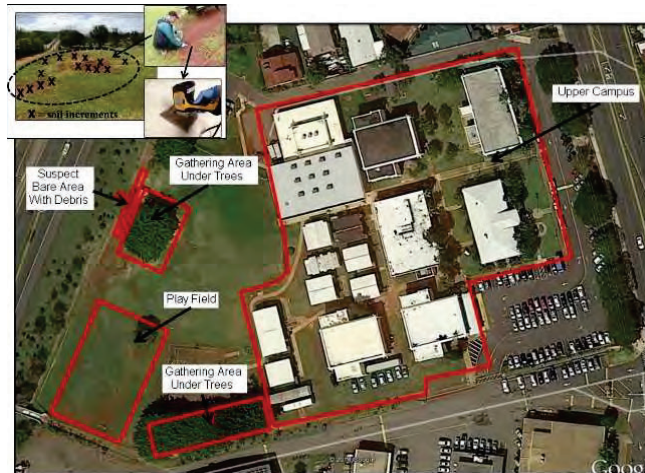


Figure C-8. DUs designated to test for the potential presence of lead-contaminated soil at a school.

The upper campus is considered low risk for contamination and treated as a single DU area. Focus is paid to barren areas of soil exposed in otherwise thick lawns, including soil along walkways, under outdoor tables and in areas of high foot traffic.

Sample increments were collected from the upper 1 to 15 cm of soil in each DU. Field screening of combined increments from clusters of barren areas within the main campus was carried out using a portable XRF to determine if large-scale patterns of contamination could be distinguished. The soil was ultimately combined and tested as a single sample after field screening suggested low levels of lead within the DU area as a whole.



C.5 LARGE SINGLE-USE AREAS

Characterization of very large areas that have historically been used for a single purpose is sometime necessary as part of a redevelopment project. Examples include large, former agricultural fields, fishponds, former military munitions testing and training areas or golf courses to be redeveloped for residential housing or commercial use. Testing of soil might be carried out to investigate risk associated with existing contamination or to establish a baseline for future redevelopment and protection of the area.

Two relatively simple examples are given below, redevelopment of a former golf course and former agricultural field for residential housing. An example investigation of a more complex, former industrial complex is presented in Section C.9.

C.5.1 Former Golf Course

In this example, a 100-hectare former golf course is slated for redevelopment as residential housing (Figure C-9). Arsenic and other pesticides were known to have been used for weed control in the past. Several hundred homes were to be constructed on the property. Experience at other golf courses suggested that the upper half-meter of soil could be impacted above levels of potential concern.

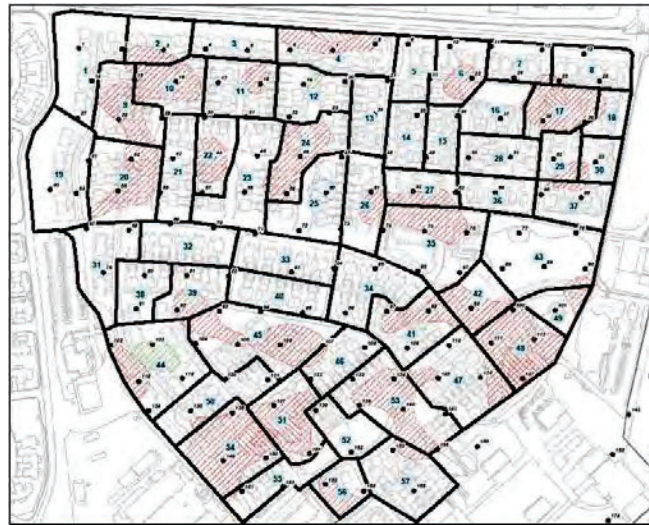


Figure C-9. Grouped lots for Decision Units at a Proposed Residential Site Exposure area DUs for a 100-hectare former golf course based on clusters of planned houses. Red cross-hatched areas indicate suspected arsenic-contaminated soil based on locations of former greenways.

Testing of each individual lot was determined to be impractical and, given the relatively uniform use of pesticides across the course over time, unnecessary. As an alternative, clusters of four to five homes were designated as DUs for testing (total 57). Three layers were designated for testing at each DU: 0 to 15 cm, 15 to 50 cm and 50 to 100 cm. A thirty-increment sample was to be collected from each DU layer.



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A backhoe was used to dig 30 one-meter-deep pits in each DU in a systematic, random fashion (Figure C-10). A single increment was collected for each layer by scraping 50 grams of soil from the entire, exposed interval of soil. Layer-specific increments were combined and three separate samples prepared for each DU. Independent triplicate samples collected from separate pits were collected and prepared for six of the 57 DUs and used to test the precision of the overall sampling method. The resulting data allowed a three-dimensional image of soil that exceeded cleanup levels to be developed and incorporated into the site grading and soil removal plan.



Figure C-10. Backhoe potholes used to collect increments from three subsurface layers designated for DUs at a former golf course (see Figure C-9).

C.5.2 Former Agricultural Field

This example focuses on the redevelopment of a 200-hectare former agricultural field proposed to be redeveloped for residential housing (Figure C-11). The proposal calls for 1,000 single-family homes to be constructed on 1,000 m² lots, with additional space allotted for small parks and playgrounds. The exact layout of the development plans has not been finalized, however.



Figure C-11. Subdivision of a large former agricultural field into large DUs to assess overall large-scale impacts with pesticides and contaminated irrigation water.

The developer decides to investigate the fields prior to purchasing the property. The fields are investigated in three phases. The first stage of the investigation includes a thorough review of the history of the property, including soil types, drainage patterns, drainage patterns, types of crops grown and pesticides used, potential



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presence of localized pesticide mixing and storage areas, etc. The second stage involves completion of a large-scale “baseline” characterization of pesticide levels between individual field areas. The third stage involves random testing of a statistically significant number of hypothetical house lots randomly located throughout the field area.

The results of the baseline assessment can be used by the developer to decide whether to proceed to a more time consuming and costly, detailed investigation. The baseline investigation also required a thorough walkthrough of the entire site. This can assist in identification of previously unknown dumping sites, waste pits, former plantation camp areas, pesticide mixing or storage areas, etc. that might otherwise be missed. A baseline assessment combined with a thorough Phase 1 Environmental Site Assessment (Phase 1 ESA) report might also be adequate for regulatory concurrence to develop a field area for commercial/industrial use without the need for higher-resolution data.

Phase 1: Background Investigation

The Phase 1 ESA included a review of the following information:

- Crop history;
- Current and past pesticide use;
- Historic aerial photographs;
- Historic Sanborn Fire Insurance maps, topographical maps, or other maps (used to identify past buildings and pesticide mixing and storage sites);
- Interviews with former employees;
- Existing soil investigation reports (including investigations of adjacent or nearby fields using lot-size DUs);
- Review of other published, historic information (journals, etc.); and
- Field inspection (current operations, former buildings, suspect dump areas, etc.).

The Phase 1 ESA review determined that the fields were only used to grow crops. A former, pesticide mixing area in lower right of area (red) to be investigated separately from fields due to suspected areas of localized, heavy contamination (see Figure C-11; refer also to Example C.7.2). There was no additional evidence of past, on-site mixing or storage of pesticides or reasons to otherwise suspect the presence of small, localized areas of heavy contamination.

Phase 2: Baseline Investigation

Decision Units for the baseline investigation were designated based on soil type, crop history, pesticide use, potential use of contaminated groundwater or surface water for irrigation, terrane and drainage patterns, etc. A total of 21 DUs were designated (see Figure C-11). A 50-increment, 2 to 3 kg, sample was collected from each DU. The upper 0 to 15 cm of soil was targeted for sample collection. The exposed soil is assumed to be reasonably representative of the upper 50 cm due to regular plowing of the fields, as determined in the Phase 1 assessment. Independent, triplicate samples (primary sample plus two replicates) were collected in two of the DUs to test the precision of the overall sampling method. A total of 25 samples were collected, including the replicates. The fields had been recently plowed, allowing for easy sample collection. Field work was



completed over the course of one week.

The results of the baseline investigation suggested relatively low levels of residual pesticides throughout the fields. A decision was therefore made by the potential developer to proceed to more detailed testing at the scale of hypothetical, individual house lots.

Phase 3: Testing of Housing Exposure Area DUs

The baseline assessment can be thought of as testing of the fields at a “neighborhood” scale. Each of the 1,000 house lots planned for the redevelopment could be considered to represent an Exposure Area DU within a neighborhood. Testing of every lot is not practicable. After consulting with risk assessors trained in Gy’s Theory of Sampling, a decision is made to test a sufficient number of lots to conclude with 95% confidence that the concentration of a pesticide does not exceed the target screening level for at least 95% of the lots in total.

This was accomplished by testing of 59, randomly located, hypothetical, 1,000 m² Exposure DUs within the project area (Figure C-12; USEPA, 1989a; see also HIDOH 2016). An attempt was made to space the DUs in systematic random distribution within the field area as a whole. This allowed 95% confidence that the concentration of a contaminant in at least 95% (950) of the proposed 1,000 house lots will be lower than the highest concentration reported for the 59 lots tested. If the highest concentration reported for any given pesticide does not exceed the correlative screening level, then the field can be cleared for residential redevelopment. This was the case for the Phase 3 study and a decision was made to proceed with redevelopment.



Figure C-12. Lot-size DU tested as part of a Phase 3 investigation of a large agricultural field.

Note that the 95% confidence criteria will not be met if the highest mean concentration of just one of the 59 DUs exceeds the applicable target action level (see HIDOH 2016). Additional sampling would instead be required to adequately identify and address areas of the field where lot-size DUs could fail screening levels. In most cases this would not be cost-effective and redevelopment for less sensitive purposes would need to be considered.



C.6 VERY SMALL AREAS

Characterization of DUs as small as a square meter or less in area and a very small volume of soil or sediment might be required under some circumstances. Examples include testing of the upper few centimeters of soil around a leaking tank valve to document the presence of a release (Figure C-13) or testing of sediment in a storm sewer vault to assess runoff from a known or suspect, contaminated area (Figure C-14). The third example reflects collection of a soil sample from an obviously contaminated location within a large, illegal dump site for enforcement purposes to document the presence and nature of the chemicals released (Figure C-15).



Figure C-13. Stained area under valve of large fuel tank designated as a small DU to document the presence of a release.



Figure C-14. Stormwater drainage vault designated as a DU for testing of sediment runoff from a contaminated property.



Figure C-15. Designation of small, targeted DUs within an illegal dump site to identify potential contaminants of concern.

These examples are similar to the concept of “judgmental,” “biased” or “subjective” sampling but with the term “discrete” referring to a small, localized area targeted for characterization rather than the method used to collect a sample. The distinction between testing of “discrete areas” versus collection of “discrete samples” from a single point within a targeted area is important and a common cause of confusion past environmental investigation guidance documents (refer to Appendix E).

In the case of the storm sewer vault, the volume of sediment in the vault represents the DU of interest. A minimum 30-increment, 1 to 3 kg sample is collected. If the volume of sediment is small enough, then the entire DU can be collected and submitted to the laboratory for processing and testing. This ideal scenario, referred to as to as "direct inference" (AAFCO 2015), negates the need for the collection of a MI samples (and replicates) and eliminating potential field error (e.g., <2 kg of material present). The sediment must be processed and subsampled for analysis at the laboratory in accordance with MI protocols for the data to be considered representative.

The concept of very small DUs also applies to targeted “DU Layer” of soil or sediment in a core where decisions are to be made on data for single, exploratory boreholes. If the targeted interval of the core is less than a meter in length, then it is usually practical and even desirable to submit the entire core interval to the laboratory for processing and testing. In other cases, subsampling of the core will be required to reduce the sample to a manageable mass (see Appendix G).



C.7 SUBSURFACE DECISION UNITS

C.7.1 Buried Waste Pit

This example demonstrates the designation of subsurface DU layers for testing at a former industrial site slated for residential and commercial redevelopment. Four distinct layers were identified in the sidewall of an excavation to remove what was initially thought to be a small dump site (Figure C-16). DU Layer 4 represents native soil. DU Layer 3 represents a former waste pit. DU Layer 2 is fill material placed over the former dump that was contaminated by subsequent releases at the surface. DU Layer 1 represents a thin layer of more recent and presumably clean fill.

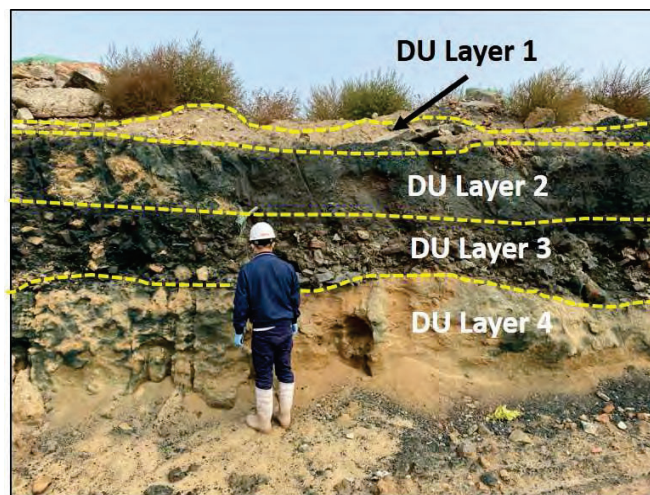


Figure C-16. Designation of multiple DU Layers for characterization.

A single, 2 to 3 kg, 75-increment sample was collected from each DU layer to obtain preliminary data on the type and general magnitude of contamination present. This comes with an understanding that contamination can vary significantly between different areas of the waste pit.

The resulting data suggested that the underlying, native soil in DU Layer 4 and the fill material in DU Layer 1 were relatively clean. Significant contamination of DU Layer 2 and DU Layer 3 with a mix of heavy metals and solvents was confirmed, however.

A decision was made to remove DU Layers 2 and 3 prior to redevelopment of the property. Exploratory trenches and borings were used to identify the approximate lateral and vertical extent of the waste pit material. Adequate *in situ* samples were collected to permit preparation of a workplan to excavate the soil and transport it to a treatment and disposal facility. The thickness of targeted DU layers varied across the site. Refer to Appendix G for guidance on the collection of representative samples under this scenario. Confirmation samples were collected from the floor and sidewalls of the excavation to confirm cleanup to screening levels for residential redevelopment (see Appendix H).



C.7.2 Above Ground Storage Tanks

This example expands on characterization of the former, pesticide mixing area discussed in Example C.1.3 (see Figure C-4). Contamination of soil in the outer areas was anticipated to be restricted to the upper meter of soil. Arsenic and dioxin were the primary contaminants of concern, posing potential direct exposure risks. The area was subdivided into multiple, Exposure Area DUs in areas of no more than 500 m², the default exposure area used to clear site for residential redevelopment.

Soil beneath tanks used to store and dispense pesticides was suspected to be heavily contaminated at depth with arsenic, dioxins and triazine pesticides, posing both direct exposure and leaching hazards. Source Area DUs designated in this area were intentionally made no larger than 100 to 200 m² to provide a higher resolution of sample data and optimize anticipated remedial actions.

Subsurface DU layers designated for the DU areas are depicted in Figure C-17. Three vertical DU layers were designated for the outer Exposure Area DUs: 0 to 25 cm, 2) 25 to 100 cm and 3) 100 to 150 cm. The *in situ* volume of soil associated with the respective layers in each of the 500 m² DUs was approximately 125 m³, 375

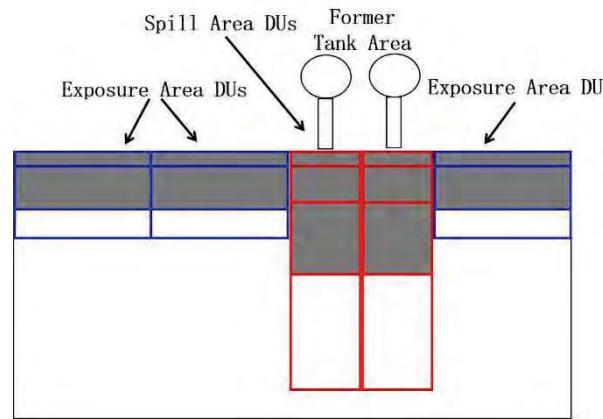


Figure C-17. Cross Section of Subsurface DU Layers Designated at Former Pesticide Mixing Area Facility (white indicates anticipated clean soil).

m³ and 250 m³, respectively. Removal of the upper two layers across most of the area was anticipated. The lowermost layer was anticipated to be clean.

Four vertical DU layers were designated to characterize soil in Source Area DUs designated beneath the former aboveground storage tanks (see Figure C-16): 1) 0 to 25 cm, 2) 25 to 100 cm, 3) 100 to 250 cm and 4) 250 to 500 cm. The volume of soil associated with the respective layers ranged from 25 to 150 m³ for the first two layers and 150 to 500 m³ for the lower layers. The deepest layer in each DU was anticipated to be relatively clean.



A 30-increment sample was collected from each DU layer using a direct-push rig (Figure C-18). Each interval of the targeted DU layer in the collected core represented a sample increment. Individual increments were too large to combine into a single sample for a DU layer as a whole. As an alternative, a 50-gram subsample was



Figure C-18. Use of direct push rig to collect increment cores from subsurface DUs.

collected from each increment. Increments for a corresponding DU layer were combined to prepare a single, 1.5 kg MI sample for the layer.

Field DU replicate samples (triplicates) were collected from independent borings for each DU layer in one of the Exposure Area DUs. A single set of field subsample replicates was collected from cores associated with one of the samples. The small size of the Source Area DUs under the tanks precluded the collection of field DU replicate samples in this area.

C.8 STOCKPILES

Refer to Appendix H for detailed guidance on testing soil stockpiles. Figure C-19 depicts a 2,500 m³ stockpile proposed for reuse as fill material in a residential development project. After discussing with risk assessors, the stockpile was flattened to no more than a meter thick and divided into 25 100 m³ DU volumes for individual testing. This equates to the volume of soil placed in a hypothetical 500 m² exposure area to a depth

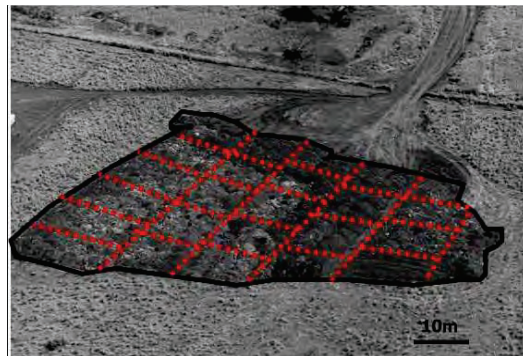


Figure C-19. Stockpile segregated into 100 m³ DU volumes for testing to allow for unrestricted reuse of soil.



of 20 cm, for example a small playground or open lawn area.

A single, 1 to 3 kg, 50-increment sample was collected from each DU. Replicate (triplicate) samples were collected in three of the DUs. Soil that met screening levels for unrestricted land use was cleared for use as fill material in the development. Soil that did not meet screening levels for unrestricted land use was disposed of at a regulated landfill.

C.9 BUILDING DEMOLITION

C.9.1 Example Setting

In this example, a former manufacturing building is to be demolished and the property remediated for commercial redevelopment (Figure C-20). All windows, doors, electrical equipment and wiring, lighting fixtures and similar material are to be removed from the building, leaving only the concrete structure itself. Asbestos containing tiles and piping insulation are to be removed and disposed of separately. Soil under the building must also be tested for organochlorine pesticides to determine if it can be reused as fill material on site or must be disposed of in a landfill.

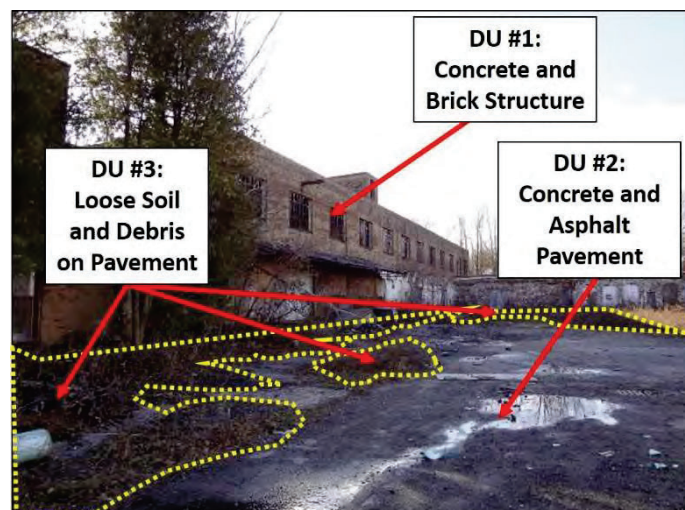


Figure C-20. Former small manufacturing building scheduled to be demolished and disposed of as part of a commercial redevelopment project.

The concrete interior and exterior walls, floors and ceilings of the building are known to have been sealed with PCB- and lead-based paint. Paint was observed to have flaked off in several locations both inside and outside of the building. Dirt and debris on concrete and asphalt pavement around the building are suspected to be contaminated with chips of PCB- and lead-based paint.

Recycling of the building concrete is not allowed unless the paint and caulking are first removed. Caulking around windows is suspected to be PCB-based and will be removed to the extent practicable and tested separately for disposal prior to demolition of the building. Any remaining caulking is assumed to be *di minimis* in terms of the total bulk mass of the building and will not require additional action or testing. Removal of the paint to allow recycling of the building was determined to not be cost effective, however.



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Testing and a Hazardous Waste Determination was required for disposal of the demolition debris in a regulated, municipal landfill. Four DUs were designated for sample collection (see Figure C-20): 1) The concrete structure, 2) The surrounding concrete and asphalt, including an adjacent parking lot, 3) Loose dirt and other debris on the pavement and 4) Soil immediately under the slab of the building. Each requires a separate sampling strategy.

The building is to be tested as a single unit, including the concrete and any paint adhered to the concrete. Note that testing of bulk building debris prior to disposal in a regulated, municipal landfill might or might not be required in a specific area. Check with the local regulatory agency for details. The examples below apply to hypothetical circumstances where the collection and testing of samples of building debris is in fact required.

C.9.2 Testing of Bulk Building Debris

The Investigation Question tied to testing of the building is: “What is the concentration of PCBs and lead for the collective walls, floors and ceilings of the building as a whole?” Note that the concentration of PCBs and lead in the paint itself is not the focus of the investigation and does not need to be considered, other than noting the potential presence of these compounds.

Two options to answer this question were discussed. The first option involved estimating the total mass of PCBs and lead in the paint and dividing this by the estimated mass of the building itself. This could be accomplished through the collection of a 75-increment sample of the paint in a systematic, random fashion throughout the interior and exterior of the building. The total mass of PCBs and lead present in the paint is calculated by dividing the sample data by the estimated, total mass of paint on the building. The mass the building is estimated based on the total area and thickness of the floors, walls and ceilings and the average density of the concrete. Two additional, replicate samples of the paint would be collected to test the overall reproducibility of the sampling method.

The second option involved the collection of 75 core increments in a systematic random fashion through the entire thickness of the floors, walls and ceilings. This approach allows direct collection of a representative sample of the bulk material prior to demolition. Care would be taken to ensure that paint on either side of the structure is included in the increment collected. Increments would be combined to prepare a single sample for the building as a whole. Two additional, replicate sets of core increments would be independently collected from different areas of the structure to test the overall reproducibility of the sampling method.

Based on local regulations, the building can be disposed of in a municipal landfill provided that the concentration of PCBs for the structure as a whole is less than 50 mg/kg and the concentration of lead is less than 100 mg/kg. If the concentration of lead exceeds 100 mg/kg, then an additional leaching test must be carried out on the sample(s) as part of the Hazardous Waste Determination. This is referred to as the Toxicity Characteristic Leaching Procedure or “TCLP” test. If the TCLP data exceed 5 mg/L total lead, then the building debris must be disposed of in a hazardous waste landfill.

The developer for the project ultimately chose to collect MI core increment samples for characterization of the concrete structure. Resulting data confirmed that the demolition debris could be disposed of in a local, municipal landfill.



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C.9.3 Testing of Concrete and Asphalt Pavement

Field testing with a portable XRF verified that yellow striping on the asphalt and concrete pavement was lead-based. The lead is tightly bound within the thermoplastic, polymer paint and is not significantly leachable unless ground. Testing of the pavement for disposal will therefore not be required provided that the debris is disposed of in a regulated, municipal landfill. As an alternative, the asphalt can be included in the feedstock at an asphalt production plant without further testing.

Recycling of the concrete and asphalt pavement for general, unrestricted reuse as fill material would not be allowed unless the striping is first removed. This would require milling of the striping from the pavement and likely disposal of the material as hazardous waste due to failure of TCLP limits for lead. This was determined to be economically practical for the smaller area of concrete pavement but not for the larger asphalt pavement area.

Asphalt pavement was ultimately removed and sent to a bulk asphalt plant for recycling. Concrete pavement was sent to a recycling facility after removal of striping and ground for reuse as gravel base fill.

C.9.4 Testing of Sweep Material

Dirt and other debris is to be swept from the pavement and placed in a single stockpile on site and tested for disposal. The total volume of material stockpiled is determined to be less than 100 m³ and sufficiently small for testing as a single DU (refer to Section 3.3.4). A single, 75-increment sample is collected and tested for PCBs, lead, PAHs and heavy oil. Two additional, replicate samples are collected and tested to assess the precision of the overall sampling method.

The material can be disposed of in a municipal landfill provided that the concentration of PCBs is less than 50 mg/kg and provided that lead in leachate from the sample does not fail the Toxic Characteristic Leaching Procedure (TCLP) limit of 5 mg/L. The debris must otherwise be disposed of in a hazardous waste landfill.

C.9.5 Testing of Subslab Soil

Five Exploratory Boreholes (see Appendix G, Section G-1) were installed through the slab of the floor prior to demolition of the building. Discrete core samples were independently tested to screen for the presence of organochlorine termiticides in the underlying soil. High levels of Technical Chlordane were identified in some but not all samples. This is not unexpected, since termiticides are normally only applied to soil within and around utility trenches that can serve as conduits for termite invasion. Identification of the exact locations of utility trenches to help isolate treated soil after a building has been demolished is difficult and the entire subslab area is normally tested as a single or multiple DUs.

Termiticide-treated soil is typically confined to a depth of 25 to 50 centimeters below the base of a slab. Three subsurface layers were therefore targeted for testing: Layer A (0 to 25 cm), Layer B (20 to 50 cm) and Layer C (50 to 100cm). The objective was to isolate heavily contaminated soil in the upper one to two layers of soil with the third, deepest layer anticipated to meet screening levels.



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A maximum DU volume of 500 m³ was required by the overseeing regulatory agency for onsite reuse of the soil as part of the commercial redevelopment (refer to Section 3.3.4). A maximum DU volume of 100 m³ was required for unrestricted, offsite reuse of the soil.

The former slab area was subsequently divided into five DU areas of 400 m² each (Figure C-21). Three layers within each DU designated for individual testing in accordance with the above-noted scheme (e.g., DU-1A, DU-1B, DU-1C; etc.). This allowed the maximum acceptable DU volume for unrestricted, offsite reuse to be met for Layers A and B if applicable screening levels were met. Soil from Layer C could be reused onsite provided that screening levels for commercial land used were met.

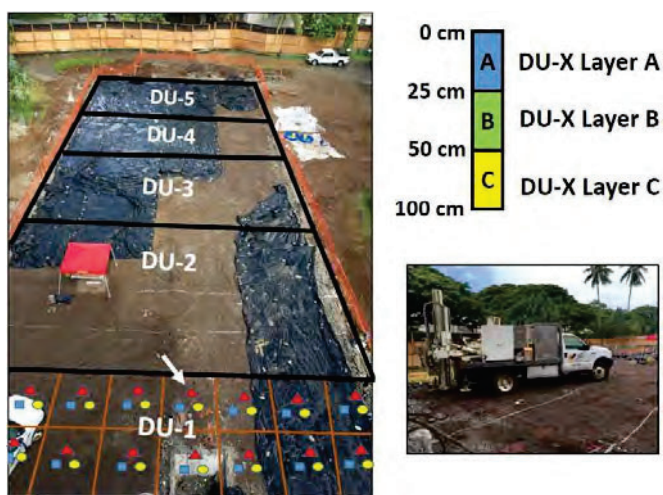


Figure C-21. Designation of DUs beneath a former building slab to test for the presence of termiticides (DU-1 only partially shown, with triplicate sample collection points noted).

Termiticides are normally dissolved in a solvent and poured or sprayed onto soil in order to obtain a relatively uniform application. Based on anticipated low distributional heterogeneity, 30-increment MI samples were therefore deemed appropriate.

A push rig was used to collect thirty, 100 cm cores in a systematic, random fashion from each DU. Targeted DU layers were identified in each core and a 50-gram subsample collected. Subsamples from each core were combined to prepare a 1.5 kg MI sample for a DU layer (refer to Appendix G, Section G.3). Triplicate samples were collected in DU-1 in order to test the precision of the overall sampling method, for a total of 17 samples (refer to Figure C-21).

In this example, the uppermost two layers of soil in all of the DUs was determined to be too heavily contaminated with Technical Chlordane for either onsite or offsite reuse. Data for TCLP tests carried out on the three most contaminated samples indicated that the soil was not classifiable as hazardous waste and the soil was subsequently disposed of at a municipal landfill. Data for Layer C in all DUs met screening levels for onsite reuse of the soil as fill material, if needed.



C.10 LARGE INDUSTRIAL COMPLEXES

C.10.1 Overview

Characterizing large former industrial complexes for cleanup and redevelopment can be challenging. Projects can be several square kilometers in size and include multiple types of manufacturing facilities, buried waste pits, worker housing and office buildings. The scope of potential environmental concerns will reflect the types of chemicals made and used at the site and typically includes direct exposure to contaminants in soil (e.g., heavy metals, PCBs, dioxins, organochlorine pesticides), leaching and contamination of groundwater or nearby surface water (e.g., soluble pesticides and solvents) and vapor emissions to outdoor and indoor air (e.g., solvents and fuels). Gross contamination issues, including short-term but strong vapor emissions from heavily contaminated soil as well as sheens in runoff and fouling of equipment (e.g., petroleum). Contamination between release sites might come mixed, making the source difficult to identify.

Preparation of a thorough Phase I is critical for development of an efficient and reliable site characterization plan (refer to discussion in Example C.5.2). This should include a thorough review of the site history, including interviews with current and former workers, available manufacturing and property records, fire insurance maps, historical aerial photos, site walkthroughs and data and observations from preliminary borings and test pits. The resulting information can be used to help designate DUs for sample collection. The review can in many cases also help expedite clearance of large portions of the site for redevelopment, while additional resources are gathered to address localized contamination problems.

A useful first step in initiating discussions for the investigation of a very complex, large area is to propose designation of the entire site as a single DU for the collection of a single sample. This is unlikely to be satisfactory for either risk assessors or remediation experts. As described in the example below, the site is then progressively subdivided into smaller Exposure Area and Source Area DUs until the resulting data will be acceptable to all parties for final decision making. This approach requires more upfront time before samples can be collected in the field, but will significantly expedite completion of the project.

C.10.2 Former Textile and Metal Alloy Manufacturing Complex

Background

This example presents a hypothetical 20-hectare former textile and metal alloy complex area that will be demolished and redeveloped for residential apartments and office buildings (Figure C-22). The site consists of a former factory area, a former worker housing area and a former office building area. All buildings have been demolished and removed including the foundations and slabs.



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Figure C-22. Former industrial complex proposed for demolition and redevelopment for residential housing.

Site records were reviewed and interviews carried out with past workers who had knowledge of the use of hazardous chemicals at the factories. Contamination of both surface soil and subsurface soils with heavy metals and solvents was suspected throughout the former factory areas. Contamination in the former worker housing area and office building area was assumed to be limited to the past use of lead-based paint and use of organochlorine pesticides for termite control under and around buildings.

Investigation Approach

The sampling team worked with risk assessors and remediation experts to develop a series of site investigation questions regarding environmental risk and optimization of anticipated remediation. Division of the site into DUs for sample collection and characterization would continue until the data to be collected met the needs of all stakeholders. Exploratory borings, trenches and pits would be used for initial investigation of suspect contaminated areas to assist in designation of DUs.

Fifty-increment samples were to be collected to test surface soil DUs as a default. Thirty-increment samples could be collected to test soil contaminated by solvents, petroleum and other releases of liquid wastes. Seventy-five increments were to be collected in cases where the contaminant could be present in the form of small ships and nuggets. Thirty-increment samples were to be collected to test subsurface DU layers, with the understanding of a reduced reliability in the resulting data for soil contaminated with particulate matter.

Field replicate samples were to include DU triplicates (primary plus two independent replicates) collected from 10% of all surface soil DUs. Field subsample triplicates were to be collected from 10% of tested subsurface DU layers. Laboratory subsample triplicates were to be tested for 10% of the total samples submitted for testing. Minimum 50-increment confirmation samples would be required for all excavations.



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Decision Unit Designation

Four options were discussed by risk assessors and remediation experts for division of the site into DUs for testing (Figure C-23). Designation of DUs was to be continued until the resulting data would adequately address all site investigation questions and concerns.

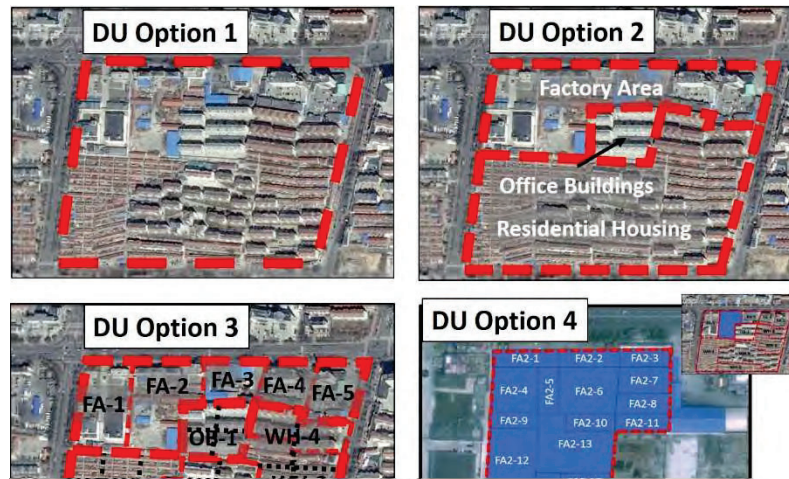


Figure C-23. Progressive subdivision of a large, former industrial complex into Exposure Area and Source Area DUs until final data resolution would be adequate to address both risk assessment and remediation needs.

Option 1:

To initiate discussion, a proposal was made to designate the entire, 20-hectare site as a single Exposure Area DU (Option 1 in Figure C-23). If this option was accepted, then a single surface soil sample would be collected, with two additional, replicate samples collected to test overall data precisions. The risk assessors concluded that the area was too large to treat as a single, exposure area. The remediation experts also stated that the data would not be adequate to address known areas of heavy contamination in the former factory area.

Option 2:

As a second alternative, the former worker housing, office building and factory areas are designated as three separate Exposure Area DUs (Option 2 in Figure C-23). This option better agreed with the anticipated type of contamination expected in each area, but the risk assessors and remediation experts were still not satisfied with this approach. The risk assessors pointed out that the worker housing unit area as a whole was still too large to treat as a single, Exposure Area DU for future residential redevelopment. They also noted that the Phase I assessment indicated that different neighborhoods of the housing area were developed at different time periods and that contamination within each area might also differ. The remediation experts stated that different types of contamination were also expected between different factory sites and that a better sample data resolution of these areas was also required.



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Option 3:

Under Option 3, the former worker housing area was divided into five neighborhoods based on the dates when the buildings were constructed (Option 3 in Figure C-23). Each of these areas as well as the former office building area was further divided into approximately 2,000 m² Exposure Area DUs for sample collection (total 36 DUs). This reflected the maximum exposure area size for high-density, residential housing agreed upon by the risk assessors.

Each of the former factory areas were similarly designated as separate Exposure Area DUs (see Figure C-23). The risk assessors felt that that this was adequate for Factory Areas 3, 4 and 5 but felt that the sizes of areas 1 and 2 were still too large to serve as default, exposure areas. The remediation experts pointed out that isolated areas of heavy contamination were known to be present in all factory areas and would likely require expensive remediation. A much higher resolution of contamination in these areas would be required to optimize remediation and manage costs.

Option 4:

Additional exploratory boreholes and test pits were subsequently carried out in each of factory area to help identify areas of heavy contamination and designate Source Area DUs for testing and/or upfront removal. Option 4 in Figure C-23 depicts subdivision and designation of Factory Area FA-2. Lateral and vertical Boundary DUs in anticipated, clean areas were designated along the borders of heavily contaminated areas to isolate soil for remediation. Areas that were not suspected to be heavily contaminated were designated as larger, Exposure Area DUs for testing.

This allowed the entire factory area to be characterized at least at the surficial level, as was the case for the industrial complex as a whole. This only marginally increases field time and cost and helps assure future residents that the property has been thoroughly tested as well as protect the developers from future liability concerns.

Both the risk assessors and remediation experts were satisfied with the resolution of the sample data to be generated. Decision Statements regarding risk and the need for remediation were developed for contaminants associated with each designated DU. This helped minimize the need to additional excavation after soil removal.



Initial removal and treatment of heavily contaminated soil was carried out without additional sampling of this soil. Fifty-increment, 1 to 3 kg confirmation samples were collected from the floors and sidewalls of the excavations for samples to be tested for non-volatile chemicals (Figure C-24; see Appendix H). Samples to be tested for volatile organic compounds were placed in methanol in the field, with a minimum of 300 grams of soil collected (e.g., 30 ten-gram increments; see Appendix I). Additional soil removal was carried out as dictated by initially collected, subsurface DU data. Source areas treated using in situ techniques were retested for confirmation of cleanup. This well-thought-out, systematic approach allowed the project to be completed in an efficient and predictable manner within the projected deadline and budget.

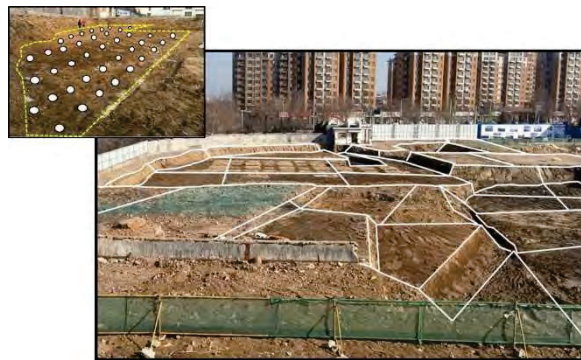


Figure C-24. Designation of excavation floor and sidewall DUs for the collection of Multi Increment confirmation samples after initial soil removal.

C.11 INVESTIGATION OF PETROLEUM RELEASES

Petroleum is the most common contaminant in the environment. The examples presented below studies focus on the designation of DUs for petroleum releases from oil wells, petroleum fuel pipelines and petroleum fuel terminals. Characterization of subsurface contamination is required in most cases due to seepage of petroleum into the ground or initial releases from buried pipelines and tanks.

The environmental risk posed by petroleum contaminated soil is evaluated in terms of Total Petroleum Hydrocarbons (TPH) and individual, indicator compounds such as benzene, toluene, ethylbenzene, xylenes (BTEX) and targeted polynuclear aromatic hydrocarbons (PAHs). Potential environmental concerns include direct exposure, leaching and contamination of groundwater or surface water, vapor intrusion into existing or future buildings and toxicity to plants and animals. Risks posed by short-term but strong emissions of vapors from heavily contaminated soil disturbed during excavation and redevelopment activities as well as fouling of construction equipment can cause significant cost overruns and delays in projects and must also be addressed. Non-specific, aliphatic and aromatic compounds collectively reported as TPH often pose the greatest risk due to their abundance over individually evaluated chemicals (Brewer et al. 2014; HIDOH 2018; ITRC 2018).



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C.11.1 Crude Oil Pipeline

This example presents a pipeline release of an estimated 1,000,000 liters of light crude oil into a wetland with no public access (Figure C-25). A more detailed discussion of this example is presented in HDOH (2018). Oil in upland areas seeped into the soil and became entrapped as isolated pockets and droplets within the capillary fringe of the water table. Oil that spread out across the surface of the wetland had immediate, acute effects on aquatic plants, fish, reptiles, birds and insects caught within the immediate release area as well as benthic organisms in exposed sediment along the marsh edge.



Figure C-25. Release of light crude oil into a marsh from a broken pipeline.

Biodegradation led to the formation of an emulsified mixture of water and degraded petroleum at the surface of the marsh and at the water table. Clumps of degraded oil floating on the surface water drifted to the shoreline and adhered to plants or sank into the underlying sediment.

Source Area DUs were designated in the vicinity of the initial release site based on field observations of heavy contamination (Figure C-26). Additional Ecological Exposure Area DUs were designated by risk assessors for assessment of shallow sediment along the marsh edge and sediment in adjacent, deeper areas of the marsh. The DUs were designated based on the nature of the aquatic habitats and anticipated depositional patterns for droplets of degraded crude oil.



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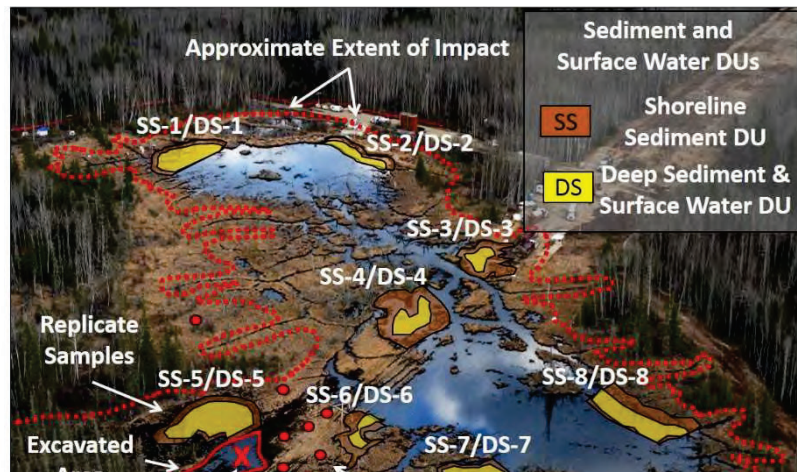


Figure C-26. Designation of Source Area and Ecological Exposure Area DUs in initial pipeline release location and along perimeter of marsh.

Sediment coring devices were used to collect 30-increment samples in all DUs (refer to examples in Section C.12). The upper 50 centimeters of sediment was targeted for sample collection. Two layers in each DU were designated for testing, the first representing the apparent, biologically active zone of the sediment as indicated by field observations (e.g., 0 to 15 cm) and the second representing the remainder of the underlying sediment (e.g., 15 to 50 cm).

Samples were tested for TPH, BTEX and targeted PAHs. Some samples were also tested for specific aliphatic and aromatic carbon ranges to better predict the toxicity and fate and transport of the residual mixture. TPH data for samples of deeper sediment collected away from the shoreline areas varied widely, with some areas within anticipated background for organic-rich sediment and other areas significantly exceeding screening levels. Replicate data were poor, confirming the presence of small nuggets of tarry, degraded petroleum in the sediment.

Easily accessible, heavily contaminated soil, sediment and vegetation was removed and transported offsite for treatment and disposal without additional testing. Booms and sorbent pads were used to reduce further spread of oil throughout the marsh. The ecological risk assessors determined that additional actions to physically remove contamination would do more harm than benefit to the marsh environment. A slurry wall was constructed around residual contamination in the initial release area to prevent migration of acutely toxic groundwater into marsh. Semi-annual monitoring of surface water, sediment, groundwater and overall health and rebound of marsh ecosystem was to be evaluated for a period of five years and the need for additional, active remediation reviewed at that time.

C.11.2 Active Gas Station

This example presents an active gas station scenario with a history of waste pits and releases from a fuel pipeline and underground storage tanks (USTs) over time. A more detailed discussion of a similar example is presented in HDOH (2018).



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A detailed characterization of surface and subsurface releases of petroleum, including mean contaminant concentration (and mass) for designated, DU areas and volumes of soil is normally not practical at active gas stations due to the presence of actively used piping and other subsurface infrastructure. In this example, the primary objective of an investigation was to estimate the lateral and vertical extent of obvious heavy (gross) contamination for in situ remediation and/or long-term management. A precise estimation of mean, contaminant concentrations is not necessary. Exploratory borings, pits and trenches were used instead to approximate the extent and relative magnitude of contamination (Figure C-27; refer also to Appendix G). Decisions were to be made based on data for individual cores, rather than data based on the designation of more typical, three-dimensional DU areas and layers.

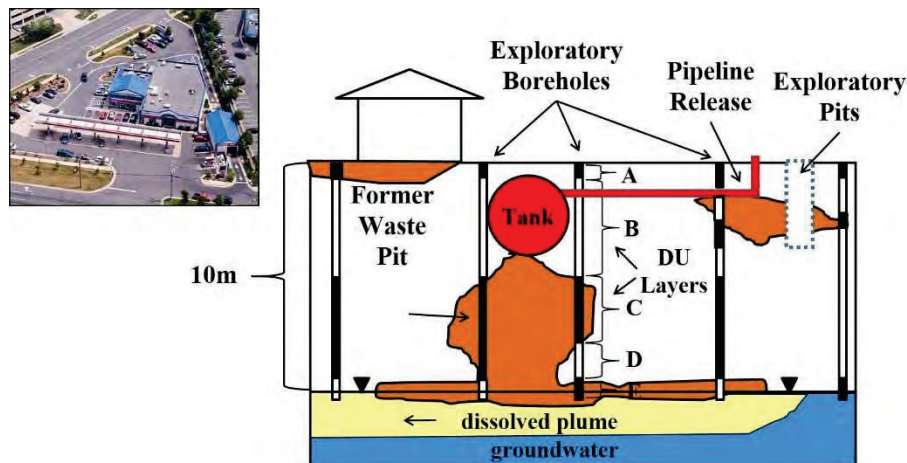


Figure C-27. Use of test pits and exploratory borings to investigate an active gas station.

Each core was subdivided into DU intervals for individual testing based on field observations and screening using a photoionization device (PID). Four intervals were typically designated – a thin interval of imported fill material, an upper zone of clean soil, a zone of contaminated soil and a thin interval within the capillary fringe of the water table. Similar DU intervals were designated for borehole cores installed immediately outside of the contaminated area to verify the absence of contamination.

A plunger device was used to collect a minimum 300-gram sample along the entire extent of each targeted DU interval in a boring (refer to Appendix I). Individual samples were placed in methanol in the field and submitted to the laboratory for analysis of TPH, BTEX and naphthalene. Groundwater and soil vapor data were also collected. The results of the investigation were used to design an *in situ*, soil vapor extraction system.

This approach allowed the entire core to be tested and more reliable data on the extent and nature of subsurface contamination. More detailed DU-MIS data can be collected from key areas of the contamination as needed, for example to better estimate the mass of hydrocarbons present and optimize the in situ soil vapor extraction system.



C.12 GAS STATION CLOSURE

Closure of a gas station similar to the above example for redevelopment of the property will require removal of the UST system, inking tanks, piping and dispensers. In this example, obviously contaminated soil has been excavated and disposed of offsite. Multiple DUs were then designated for confirmation testing (Figure C-28). Each former tank and dispenser location was designated as a separate DU. Decision Units were designated within the former piping area based on the design of individual corridor areas.

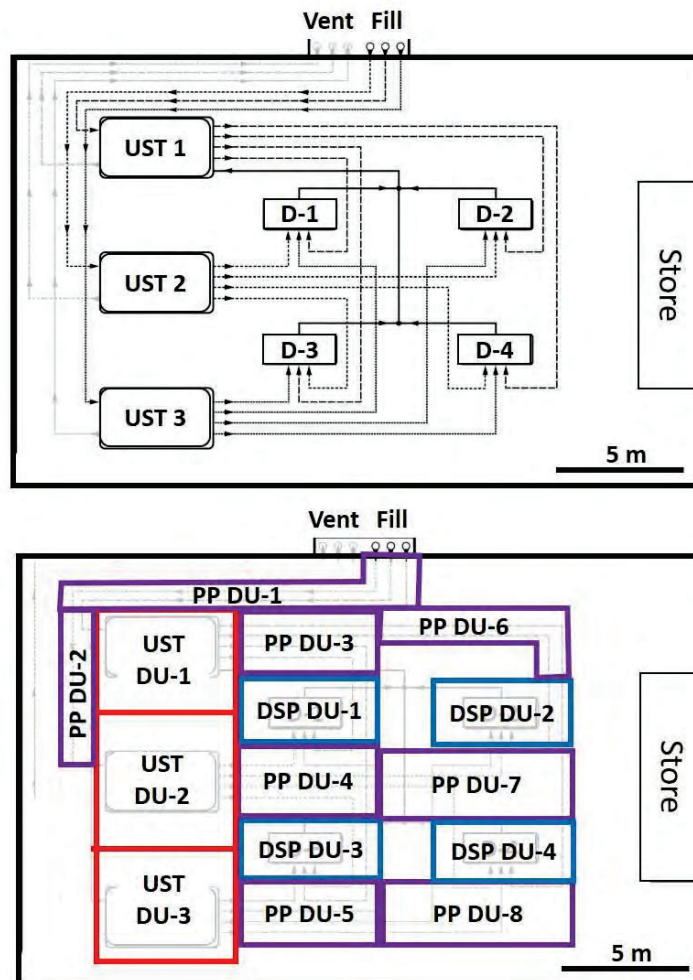


Figure C-28. Designation of UST, piping (PP) and dispenser (DSP) DUs for confirmation of closure of former gas station.

Two MI samples were collected from the walls and floors of each UST DU, one to be tested for TPH as diesel and one to be tested for volatile TPH as gasoline and BTEX (refer to Appendix I). Two replicate sets of samples were collected from the floor of UST 2 where a leak had been formerly identified and cleaned up.



Excavations for the piping and dispenser areas were relatively shallow (<1m). No leaks were identified during removal. A single set of MI samples was collected from the floor of each DU area for confirmation. Two replicate samples were collected from one of each of the piping and dispenser DUs. No further action was determined to be necessary based on the resulting sample data.

C.13 SEDIMENT DECISION UNITS

The following examples present basics concepts of DU designation for different types of release scenarios and aquatic environments. Refer to Appendix J for a detailed discussion of the collection of sediment samples.

C.13.1 Drainage Canal

Figure C-29 depicts sediment DUs designated for a shallow drainage canal that once carried wastewater from a sugar mill. Testing of surface soil at discharge points suggested that sediment in the canal might be contaminated with mercury (used as a fungicide). A relatively small DU was designated for the area of the canal immediately downstream of the discharge area (DU-1 in Figure C-29). Two additional and somewhat larger DUs were designated for areas of the canal further downstream (DU-2 and DU-3). Two DU layers were designated, 0 to 15 cm and 15 to 50 cm, based on an initial objective to test the upper biologically active layers of sediment and sediment in the canal most likely to become mobilized during flooding events. The deeper sediment was anticipated to be relatively clean.

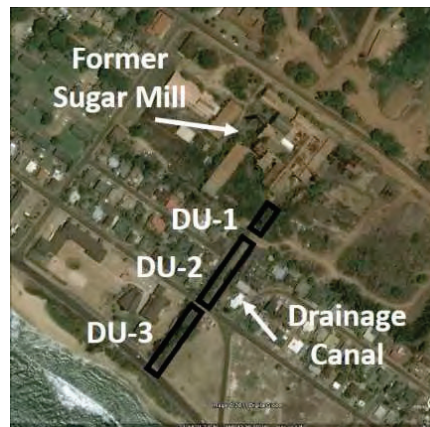


Figure C-29. DU designation for investigation of former sugar mill drainage canal.

DU-1 was 8 m long and averaged 3 m wide. DU-2 and DU-3 were 25 m feet long and again average 3 m wide. The *in situ* volume of sediment in the two layers of DU-1 was approximately 3.6 m³ and 8.4 m³ respectively. The volume of sediment in the two layers of DU-2 and DU-3 is estimated to be 11 m³ and 26 m³ respectively. Both the ecological risk assessors and remediation experts agreed that the resulting data would be useful to assess risk and, if necessary, design a remedial action.



C.13.2 Wastewater Outfall

The next example illustrates a single sediment DU designated at the outfall of a wastewater pipe. A single 100 m² DU was designated given the anticipated similarity of impacts within the small area (Figure C-30). Unconsolidated sediment extended to a depth of up to one meter. The full depth of unconsolidated sediment was tested as a single DU (total DU volume 100 m³).

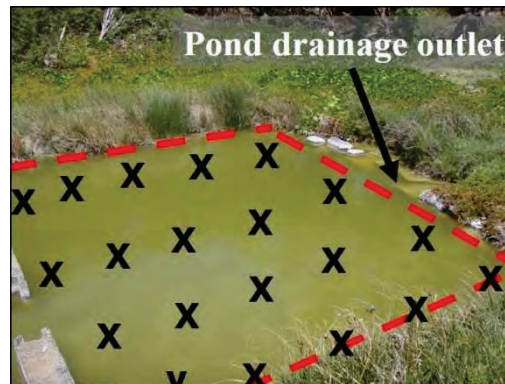


Figure C-30. DU designated for characterization of sediment at the mouth of a wastewater pond outfall. "X" indicates sample increment collection locations.

A 30-increment sample was collected using a sampling tube (refer to Appendix J). The sediment was determined to be contaminated with heavy oil, PAHs and lead and subsequently removed for disposal. No confirmation sample was necessary since the entire extent of unconsolidated sediment was tested.

C.13.3 Transformer Spill

Figure C-31 depicts DUs designated for a PCB spill suspected to have entered a small stream. The area outlined in red depicts the upland area impacted by the spill. A Source Area DU was designated to characterize this area, including Boundary DUs to confirm that the edges of contamination. Relatively small DUs, depicted in yellow, were then designated in the stream itself for characterization of sediment.

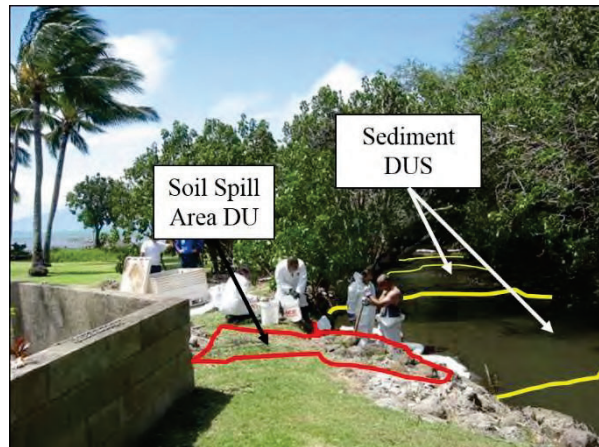


Figure C-31. Sediment DUs designated for a spill of PCB-based transformer oil beside a small stream. The DUs cover approximately 50 m² areas to a depth of 15 cm (approximately 7.5 m³ per DU).

The location and size of the sediment DUs might be based on stream flow characteristics (e.g., focus on individual depositional areas, including pools and bars) and the maximum volume of sediment to be included within a DU with respect to ecological and remedial considerations. In this example DUs approximately 50 m² in area were considered appropriate. In this example sediment cover in the stream was very thin, 5 cm to 10 cm in most areas, and the entire volume of sediment within each DU was targeted for characterization (approximately 2.5 to 10 m³ per DU).

A single 50-increment sample was collected in each DU with triplicate samples collected in the DUs closest to the transformer release area. Contamination above sediment screening levels, intended to be protective of benthic organisms, was not identified.

C.13.4 Pond with Historic Wastewater Discharges

Figure C-32 depicts a much larger sediment investigation carried out in the upper part of a spring-fed 25-hectare-acre estuary suspected to have been impacted by historic arsenic-contaminated wastewater and runoff from past agricultural operations in the area. Decision Units were designated based on potential source areas associated with the locations of past facilities as well as areas based on ecological habitats.



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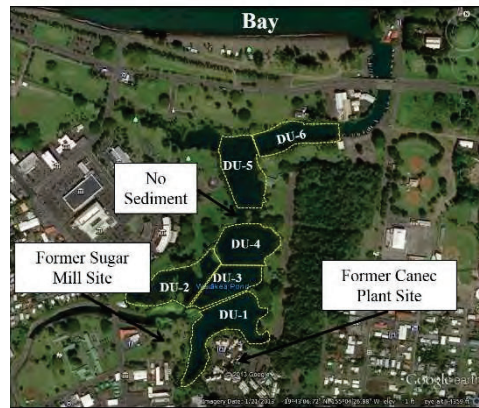


Figure C-32. Decision units designated for characterization of arsenic-contaminated sediment in an estuary.

In the example, DU-1 was placed to characterize sediment in the immediate areas of a former sugar mill and a former Canec production facility (used to make arsenic-infused, termite-resistant press-board panels from waste sugarcane fibers.). The remaining DUs reflect sediment areas more distant from the former Canec plant site. The area of the pond encompassed by DUs 2 through 5 are relatively low energy and characterized by fine silts. The lower area of the pond, DU-6, is higher energy due to focused tidal action and characterized by a mix of silts to medium-grained sand. A narrow, high-energy area between DU-4 and DU-5 was not sampled due to the lack of sediment.

Vertical layers for specific DUs were designated based on observations from initial test cores (e.g., distinct layering, grain size, aerobic versus anaerobic zones, etc.), characterization of benthic zones for use in ecological risk assessments, estimated depositional depth since closure of an industrial facility formerly located in the area, and/or desired resolution for potential remedial actions. In the example depicted in Figure C-32, the sediment was divided into three DU Layers for testing (Figure C-33): 1) 0 to 10 cm, 2) 10 to 20 cm and 3) 20 to 30 cm.



Figure C-33. Designated sediment DU Layers. Increments from cores for each DU layer combined to prepare a single Multi Increment sample for the respective DU layer.

Methods for the collection of MI samples of sediment are reviewed in Appendix J. Thirty-increment samples were collected from each of the DUs and for each DU layer using a small boat and a manual sampling tube. Increments extracted from individual cores were combined between cores to prepare a single sample for each DU layer. Replicate samples were collected from independent cores in the DU closest to the former manufacturing facility.



The final sediment samples in the example were too large for submittal to the laboratory and required subsampling in the field to reduce the sample mass (refer to Appendix J). The results of the investigation identified contamination with arsenic above screening levels in all DUs. Testing of algae, fish and crabs from the pond indicated minimal uptake of arsenic, however, a decision was made not to place restrictions on use of the pond for recreational purposes. Any sediment excavated from the pond in the future was to be disposed of at a regulated landfill.

C.13.5 Harbor Dredging

Testing Requirements

Refer to Appendix H for guidance on the collection of sediment samples. In this example, dredging is to be carried out at a hypothetical, small boat harbor in a marine environment (Figure C-34). There are three options under initial consideration for disposal and/or reuse of the sediment: 1) Disposal in a pre-established, permitted open water area, 2) Disposal at a regulated, upland landfill, and 3) Reuse as fill material in an upland area.



Figure C-34. Example harbor study site.

Characterization of sediment to be disposed of in open water is regulated by the US Army Corps of Engineers and includes consideration of parameters such as particle and toxicity to benthic organisms (USACE 2004). Although somewhat less rigorous than the DU-MIS methods discussed in this guidance, regulator sample collection and testing methods are considered to be adequate for the intended disposal purposes. Option 1 was dismissed, however, due to the lack of a nearby, permitted area and the cost to transport the sediment to a more distant area.

Option 2, disposal at a regulated landfill, was also dismissed due to costs as well as landfill capacity concerns. This left Option 3, reuse of the dredged material as fill material in an upland area as the only acceptable alternative. Proposals for disposal or reuse dredged sediment in an upland area requires consultation with the regulatory agency that oversees the reuse of recycled “soil” (e.g., Hawai’i Department of Health, HDOH Solid and Hazardous Waste Branch). Characterization must be carried out using DU-MIS methods described in this guidance document.



DU Designation

Four areas are targeted for dredging, with each area designated as a separate DU (Figure C-35). The DUs were designated only for assessment of reuse in upland areas. Assessment of potential ecological impacts of contaminants in the sediment on benthic or other aquatic organisms was not within the scope of work for the project.

A dredge depth of five feet is planned for the main channel area designated as DU-1. A dredge depth of three feet is planned for DU areas 2 and 3 in the adjacent boat slip areas. The current average water depth of the channel is five feet.

The average water depth of the slip areas is three to four feet. Preliminary drilling indicated that the upper three to five feet of sediment in these areas is characterized by unconsolidated silty clay to clayey silt. Dredging to a depth of five feet is required for the DU 4 area in order to remove a medium- to coarse-grained sand bar. The water depth in this area ranges from six to eight feet.

A total *in situ* dredge volume of approximately 84,200 cubic yards (cyds) of sediment was anticipated. Sediment volume following dewatering and natural compaction was predicted to be approximately 75% of the *in situ* estimate for clayey silt for an adjusted final volume of 65,000 cyds.

Relatively large DU areas were considered acceptable based on assumed, relatively uniform, lateral distribution of any contaminants present within the sediment. The DU areas were divided into two, 1.5-foot-thick upper layers and, in the case of DU-1, a third, lowermost two-foot-thick layer in order to consider possible higher concentrations of contaminants in deeper layers of sediment (e.g., due to lead from earlier auto exhaust). Depth intervals of this thickness (at least 1.5 feet) also correlate well to the anticipated dredge method (barge-mounted excavator), where thinner layers would be difficult to discern during the dredge process should any of the layers be found to contain contamination.

Testing of material in the sand bar designated as DU-4 was not required by the overseeing regulatory agency due to the lack of fines more prone to hold contaminants. A similar division of the sand into three DU layers for sample collection was determined appropriate by the responsible party, in this case the county government, for due diligence purposes.

The final area and approximate, *in situ* and *ex situ* volume of sediment in each DU is summarized in the below table:



Figure C-35. Shape and location of designated DUs.



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Final DU Designation.

Primary DU Area	Final DU ID Number	Sediment Type	Area	Sediment Interval	Estimated <i>In Situ</i> Sediment Volume	*Estimated <i>In Situ</i> Sediment Volume
DU-1	DU-1A	Clayey Silt	175,000 ft ²	0.0 - 1.5 ft	9,700 cyds	7,300 cyds
	DU-1B	Clayey Silt	175,000 ft ²	1.5 - 3.0 ft	9,700 cyds	7,300 cyds
	DU-1C	Clayey Silt	175,000 ft ²	3.0 - 5.0 ft	13,000 cyds	9,700 cyds
DU-2	DU-2A	Clayey Silt	150,000 ft ²	0.0 -1.5 ft	8,300 cyds	6,250 cyds
	DU-2B	Clayey Silt	150,000 ft ²	1.5 - 3.0 ft	8,300 cyds	6,250 cyds
DU-3	DU-3A	Clayey Silt	250,000 ft ²	0.0 - 1.5 ft	13,900 cyds	10,400 cyds
	DU-3B	Clayey Silt	250,000 ft ²	1.5 - 3.0 ft	13,900 cyds	10,400 cyds
DU-4	DU-4A	Sand	40,000 ft ²	0.0 -1.5 ft	2,200 cyds	2,200 cyds
	DU-4B	Sand	40,000 ft ²	1.5 – 3.0 ft	2,200 cyds	2,200 cyds
	DU-4C	Sand	40,000 ft ²	3.0 – 5.0 ft	3,000 cyds	3,000 cyds
Total:					84,200 yds	65,000 cyds

*Assumes minimum 75% reduction of original *in situ* volume of clayey silt material following dewatering; rounded.

The <2mm fraction of sediment was designated as the targeted DU particle size, corresponding to requirements for testing of upland soil by the overseeing regulatory agency. Stormwater runoff is considered to be the primary source of any potential contamination. No boat maintenance areas, open dumping of waste or other past or current point source areas of contamination are known to be present.

Targeted Contaminants of Potential Concern

Potential contaminants of concern include organochlorine pesticides, lead, PCBs, heavy petroleum and PAHs. Salinity is also considered a contaminant of concern for proposed upland placement of the sediment due its location in a marine environment and concerns regarding potential toxicity to upland plants. Phytotoxicity is assessed based on testing of Electrical Conductivity and Sodium Absorption Ratio data (HIDOH 2017). An Electrical Conductivity greater than 2 mS/cm and/or a Sodium Absorption Ratio greater than 5 is assumed to pose potential phytotoxicity concerns for typical, upland plants.

Sample data for targeted contaminants of potential concern will be directly compared to comprehensive, Environmental Action Levels for direct exposure, leaching and gross contamination concerns published by the overseeing regulatory agency (e.g., refer to HIDOH 2017). Appropriate restrictions will be placed on reuse of the dredged material based on the results of this comparison and in absence of a more detailed, case-specific environmental risk assessment.



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In situ vs Ex Situ Sample Collection

The collection of 30-increment samples was approved based on the assumed water-based deposition of fine, particulate material and lack of large particles and fragments of waste material in the sediment. Options for characterization include: 1) Collection of samples *ex situ* after placement of the sediment in stockpiles to dewater, following stockpile sampling methods (refer to Appendix H) or 2) *In situ* collection of samples prior to dredging. The option for *in situ* sample collection was selected due to permitting and site preparation costs and requirements for an interim staging area and a desire to complete the project as quickly as possible.

Two independent sets of thirty replicate cores were designated to be collected from DU-1 in order to test the precision of the overall sampling and analysis methods ("Field Replicates"). The terms (FR1) and (FR2) were added to end of the DU Layer identification numbers in order to identify the replicate samples.

Sample Collection Methods

Vibracore equipment was determined to be the most appropriate sampling method given the need to collect increment cores from a boat and the depth of the water involved (Figure C-36). Use of a Mini Vibracore was determined to be adequate for testing of DUs 1, 2 and 3 in the shallower and less turbulent areas of the harbor. A standard, more heavy duty Vibracore was selected for the collection of increment cores from DU-4. This was due both to multiple factors, including the depth of the water, a potential for stronger currents, the depth of coring needed and the presence of relatively dense sand in the bottom five feet of the DU.

Core increments were collected in a systematic random manner in each of the DUs. A GPS device was used to move the boat to each collection point (see Figure C-36). The Vibracore was lowered to the top of the sediment at each location using a weighted platform provided by the supplier. A five-foot, two-inch diameter acetate and/or aluminum sampling tube with an inner liner was used to collect increments in DUs 1,2 and 3 with the mini Vibracore. A ten-foot, four-inch diameter tube with a liner was used to collect increments from DU-4 with the full-size Vibracore.

A sediment-catch device was attached to the bottom of each core barrel in order to minimize loss of material during retrieval of the barrel to the surface. Triplicate sets of increment cores were collected from independent areas of DU-1 using the equilateral triangle spacing approach depicted in Figure L-2 of Appendix L.



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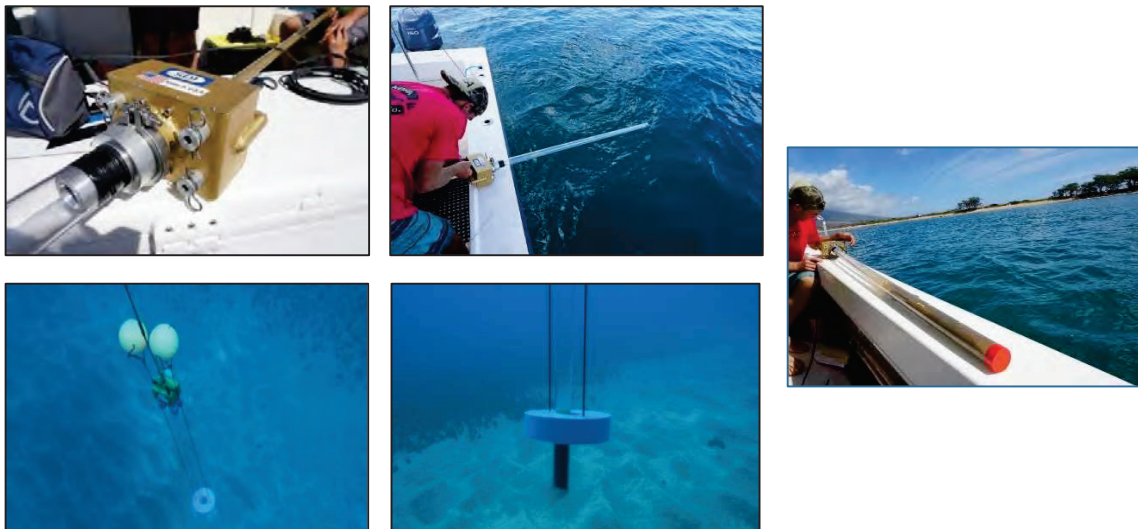


Figure C-36. Use of a Vibracore to collect core increments from designated DUs (Top Left and Center: Mini Vibracore used to collect increments in DUs 1, 2 and 3; Bottom Left and Center: Submersible platform designed by manufactured by Specialty Devices Inc. and used to lower Vibracore to the designated increment collection location); Far Right: Extracted core increment.

Sample Preparation

Increment cores were opened for the collection of subsamples immediately following retrieval at each location. Sediment was observed to have compacted during insertion of the core barrel in many of the samples extracted from DUs 1, 2 and 3. The midpoint of the core was assumed to represent the original contact between DU Layers A and B (i.e., original depth of 1.5 feet).

The volume of sediment in the cores was too large for combination of complete increments into a single sample. As an alternative, an approximately 100-gram subsample was collected from the interval in a systematic random method using a plastic syringe-type sampling device (refer to Appendix J). Increment subsamples corresponding to a targeted layer for the specified DU were combined across cores and placed into a new, heavy-duty LDP freezer bad for preparation of a bulk sample. The total mass of each sample was approximately three kilograms. Subsample collection and sample preparation was carried out in a similar manner for core increment collected from DU-4. No compaction of the sand interval was indicated in the core.

Replicate subsamples were collected from each of the DU-1 layers for followup assessment of the precision of the field subsampling method (“Field Subsampling Replicates”). Overall retrieval of the targeted core intervals was adequate for most cores. Poor retrieval of sediment in a small number of cores was not considered to have significantly biased the resulting bulk sample due to the relatively large number of increments collected in each DU.

A total of 21 samples were prepared for analysis during the investigation - 10 primary samples, six field replicate samples and four field subsampling replicates. Samples were immediately placed on ice and shipped to the laboratory for further processing and testing the following day. Excess sediment was placed back within the DU area where the corresponding sample increments were originally collected.



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Laboratory Processing

Each sample was spread into a 1cm-thick layer on a dedicated tray and air dried at 25°C for approximately 72 hours following receipt by the laboratory. Air drying at room temperature was considered to be acceptable to the nonvolatile nature of the targeted contaminants and anticipated minimal degradation during this time period.

Following drying, samples were crushed using a mortar and pestle in order to break up clumps of dried clay and silt. Samples were then passed through a #10 sieve and >2mm-size particles removed. A sectoral splitter was then used to prepare an adequate number of ten-gram subsamples for testing. The collection and testing of replicate subsamples to assess subsample collection precision (“Laboratory Subsampling Replicates”) was determined to be unnecessary due to use of the sectoral splitter.

Results

Concentrations of all targeted contaminants were well below action levels set by the regulatory agency for unrestricted reuse of the dredged material. The salinity of the sediment, however, significantly exceeded action levels for potential phytotoxicity to upland plants (salinity similar to fast-food French fries). The clayey nature of sediment from all but the sandy interval of DU-4 further precluded use of the material for structural fill beneath buildings or roadways.

Approval was made to reuse the silty and clayey sediment as fill material in low lying areas of the adjacent coastal park without further testing. Sand would be used for beach replenishment at the park. Dredged sediment is to be stockpiled on site and dewatered. The sediment will then be placed in the selected areas and amended as needed to promote the growth of salt-tolerant plants.



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APPENDIX D. SAMPLING THEORY AND MULTI INCREMENT SAMPLE COLLECTION

D.1 THEORY OF SAMPLING

D.1.1 Early Mineral Exploration Industry

Sampling theory for testing of particulate matter such as soil and sediment was developed by the mineral exploration industry in the 1800s and 1900s. Mineral exploration involves detailed mapping to identify potentially valuable bodies of mineral bearing ore. This is much like a Phase I investigation in the environmental industry, where existing information is used to identify potential areas of contamination. When a promising ore body is found, multiple cores are collected and tested. The resulting sample data are used to make an initial estimation of the mean concentration of the commodity in the ore body as a whole, referred to as the “grade” of the ore. This is then used to estimate the total mass of the commodity present. If the estimated mass of the commodity present in the ore meets minimum requirements for profitable exploitation, then the ore is excavated, crushed into small fragments, retested to verify grade, and in most cases sold to a third party for further processing and extraction of the targeted commodity (Figure D-1).

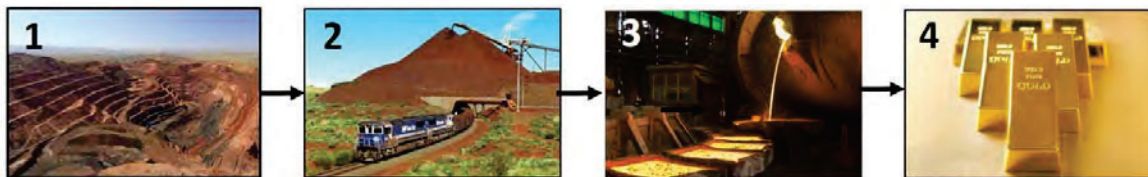


Figure D-1. Mineral industry process: 1) Identification and mining of ore body, 2) Crushing, stockpile, sampling and shipping of ore to extraction facility, 3) Extraction of commodity of interest and 4) Determination of true grade and mass of commodity in each lot of crushed ore.

The true mass of a commodity in a specified volume of processed ore can only be known after the ore is extracted. Accurate estimation of commodity mass requires an equally accurate collection of representative sample data. Poor sampling methods can lead to significant over estimation or, more commonly, under estimation of commodity mass. This was indeed the case until relatively recently in the mining industry. Estimates of the mean concentration of a commodity for a targeted body of processed ore based on statistical analysis of individual, “discrete” sample data or “composite” sample data often proved to be highly inaccurate. Bankruptcies and lawsuits were common, as were missed opportunities for profitable mining and use of much needed but overlooked, natural resources.

D.1.2 Development of Gy’s Theory of Sampling

Background

Beginning in the late 1800s, mining specialists began working with statisticians to understand the causes of poor data quality and develop more reliable methods of sample collection. The result was compiled and summarized by Pierre Gy in the 1950s and is now referred to as the Gy’s Theory of Sampling (Pitard 2005, 2009, 2019; Ramsey and Hewitt, 2005; Esbensen 2020).

Gy’s Theory of Sampling and subsequent expansions of the approach were developed to address two



deceptively simple questions: 1) “What is the minimum sample mass required to represent a targeted volume of crushed ore within a specified level of confidence?” and 2) “How should the sample be collected in the field?” and 3) How should the sample be processed and analyzed at the laboratory? Answering these questions required a detailed understanding of the sources of error in sampling data. Over several decades, error was systematically categorized and evaluated in terms of the individual stages of the data collection process:

1. Designation of area and volume of material for testing;
2. Collection of sample in the field;
3. Processing of sample at the laboratory;
4. Collection of a subsample for analytical testing; and
5. Analytical testing.

The term “lot” is used in the mining industry for a specified volume of crushed ore that is to be sampled and tested for a targeted commodity of interest, such as gold or iron. The concept of “lots” is identical to the concept of DUs in the environmental industry as well as other sampling specific industries (AFFCO 2015; refer to Appendix C). Lots are designated for testing to assess the overall grade and economic viability of an ore deposit or to optimize mining and mineral extraction processes.

The quality of the samples collected is controlled by steps taken in the subsequent stages of the project. Mining experts quickly realized that analytical testing of a collected subsample introduced the least error into the data, due to strict test method protocols and requirements for analytical quality assessment and control at the laboratory. The primary source of data unreliability was determined to be related to four factors: 1) Collection of the representative sample in the field; 2) Processing of the sample at the laboratory; 3) Collection of a representative subsample for testing and 4) Analysis of the subsample. The greatest error was determined to be associated with the collection of a representative sample in the field followed by processing and subsampling of the material at the laboratory. Error associated with analysis of the subsample was determined to be in most cases minimal.

This error was directly tied to the inevitable, heterogeneous nature of crushed ore at both the scale of an individual particle and within the targeted lot of material as a whole. Sampling statisticians in the mining industry determined that data quality was controlled by three primary factors: 1) The mass of the sample collected in the field and the subsample tested at the laboratory, 2) The number of points from which the sample was collected and prepared, referred to as “increments”; and 3) The method used to collect the individual increments. The role that each factor played in sampling error and steps to address this error were systematically investigated and ultimately published as Gy’s Theory of Sampling (Pitard 2019).

Compositional and Distributional Heterogeneity

Potential error associated with the first two factors is related to the compositional and distributional heterogeneity of the media of interest (Figure D-2). Compositional heterogeneity (Figure D-2a) refers to variability between individual particles and is described in terms of particle size, shape and density. Other characteristics of importance include whether the commodity of interest is bound up within individual particles or fully liberated and present as individual nuggets.



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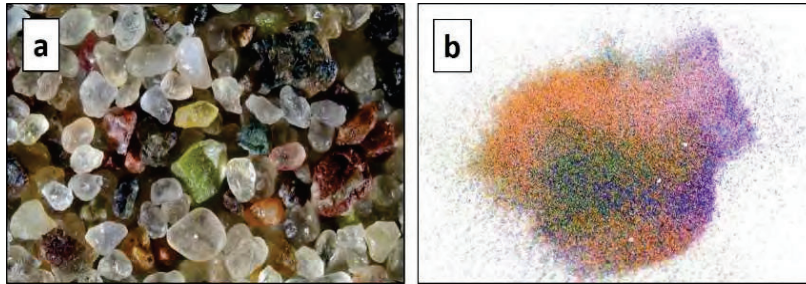


Figure D-2. Example of compositional heterogeneity between individual particles (a) and distributional heterogeneity of particle types within a targeted volume of material (b). Distributional heterogeneity occurs at the scale of the sample, the DU and the project site as a whole.

Distributional heterogeneity in the mining industry refers to variability of the mean concentration of the commodity within the project area, within the lot to be characterized and even within the sample collected and submitted for testing (refer to Figure D-2b). Mining statisticians realized that a sample collected from a targeted lot of crushed must accurately capture and represent the inherent distributional heterogeneity to obtain data representative of the crushed ore as a whole.

Sample error associated with compositional and distributional error can never be fully eliminated, but it can be controlled and minimized. Error associated with compositional heterogeneity is controlled by collecting an adequate mass of the material. Error associated with distributional heterogeneity is controlled by collecting the sample from a large number of points within the targeted volume of material.

Fundamental Error and Minimum Sample and Subsample Mass

Gy reviewed decades of data for testing of crushed ore and developed an equation to quantify what he referred to as Fundamental Error that relates the error induced by compositional heterogeneity to total sample mass. Although several approaches for quantification of Fundamental Error have since been derived, “FE” is most commonly expressed as (Minnitt 2007):

$$\sigma^2 = \frac{fgcd_N^3}{M_s}$$

where “ σ^2 ” is variance or error, “f,” “g,” “c,” and “l” represent “Shape,” “Granulometric,” “Mineralogical Composition,” and “Liberation” factors that quantitatively describe the variability of particle characteristics, “ d_N ” is the nominal maximum particle size and M_s is sample mass. Particle characteristics can often be estimated and combined as a single constant “K” for specific types of ore and the equation simplified as:

$$\sigma^2 = \frac{Kd_N^3}{M_s}$$

The maximum size of the particles present in the crushed ore was determined to have the greatest influence on sample data error. Fundamental Error could therefore be most efficiently controlled by thorough crushing



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of the ore and/or the collection of a larger sample mass.

Rearranging the equation to solve for sample mass allows for the minimum mass of a sample required to control Fundamental Error at a specified particle size and confidence level to be calculated:

$$M_s = \frac{Kd_N^3}{\sigma^2}$$

In general, sample collection, processing and testing should be carried out in a manner that reduces Fundamental error to a minimum of 15% (see USEPA 2003a, Minnitt 2007). The mass of a sample required to meet the specified level of Fundamental Error is directly proportional to the cube of the particle size. Comparably small decreases in the maximum particle size by crushing and grinding could therefore lead to substantial decreases in the mass required to address Fundamental Error.

This solved one aspect of the minimum sample mass required to represent a targeted lot of crushed ore. Gy's research demonstrated that relatively small sample masses could, in theory, be representative of very large volumes of material provided that the ore was crushed to a small enough particle size. For example, a sample mass of only a few grams is predicted to reduce Fundamental Error to the target goal of <15% for material that has a maximum dimension of less than 2 mm.

The only remaining factor in the collection of a representative sample was, in theory, the number of increments to be included in the sample. Research, however, would quickly indicate that the actual collection of increments in the field was itself a large source of data error. Addressing this error would require the collection of much larger masses of crushed ore to obtain reliably representative samples.

Distributional Heterogeneity and Increment Collection Points

Potential sampling errors associated with distributional heterogeneity, collectively described by Gy as Grouping and Segregation Errors (Minnitt 2007; Pitard 2019; Esbensen 2020), are addressed by the collection and combination of a large number of small masses of particles throughout the targeted DU using a systematic-random approach (refer to Appendix D). Each mass is referred to as an "increment." The final sample prepared is referred to by some researchers as a Multi Increment (MI) sample.

Determination of the number of increment collection locations (or times, in the material is moving by on a conveyor belt) necessary to represent a lot of crushed ore is specific to the nature of the ore being tested as well as the nature of the mining operation and ore processing. In the mining industry, careful studies carried out to compare sample data for a lot of ore based on different numbers of increments to the mass of the commodity determined after extraction. If the nature of the ore changes, then fewer or more increments might be required to collect representative samples. This requires constant coordination with workers excavating ore from the mine as well as workers processing and moving ore within the mining operation.

Controlling Sample Increment Collection Error

All of the particles in the targeted media must be given an equal opportunity of being selected for inclusion for the sample to be reliably representative. If not, then the sample is said to be "biased" (Pitard 2005, 2009, 2019; Minnitt 2007; Esbensen 2020). Bias can in theory be completely eliminated with proper sampling



methods. In practice, some error in sample collection is normally unavoidable.

Methods to reduce bias to a negligible level include ensuring that increments are of equal mass and that the shape of an increment is such that it equally represents the full depth interval of the media. For example, a core-shaped increment extracted from the full thickness of a tablet-shaped DU is unbiased both vertically and laterally, while a wedge-shaped increment wider at the top than the bottom can be biased in both dimensions. The physical extraction of each increment is also important. Tools used to collect increments and prepare samples must be suited to the site-specific conditions.

Unlike Fundamental Error, error associated with the physical collection of a sample can only be quantified by complete extraction of the targeted commodity of interest and comparison of the resulting mass to the mass predicted by the sample data. This requires extensive training and experience on the part of the sample collection team and preliminary collection and testing of samples using different approaches and tools. This is normally carried out on a project-specific basis and the results used to establish a standard testing procedure for subject ore.

Very stringent control of data error is required in the mining industry due to the economic implications of significant over or under estimation of the total mass of a commodity in a specific volume/mass of crushed ore to be sold on the open market. A relative standard deviation for replicate samples of <5% is often used as a criterion for acceptance or rejection of a lot of crushed ore sold on the open market. The mass of a sample required to address both Fundamental Error and error associated with the physical collection of the sample in the field can range from hundreds to even thousands of kilograms.

Controlling Laboratory Processing and Testing Error

Extensive processing of the primary sample is normally required to prepare a representative subsample of a mass sufficient to meet test method limitations – typically only a few grams (Pitard 2005, 2009, 2019; Esbensen 2020). This is accomplished by following similar methods used to collect the sample in the field. Further crushing of the primary sample to reduce the maximum particle size is normally carried out. This allows the collection of a smaller subsample that can be further ground and crushed into a fine powder. In some cases, samples are melted and turned to glass before crushing to further minimize heterogeneity and improve sample data.

Evaluating Data Usability

The overall reliability and usability of the sample data collected for crushed ore is evaluated by reviewing the methods used to collect, process and test the samples and the precision of replicate sample data (refer to Section 3.9 and Appendix L). If the samples were not properly collected in the field, then the precision of the replicate sample data is irrelevant.

The precision of the sampling method is evaluated by a comparison of data for replicate samples that are collected, processed and tested in an identical manner from the same lot. If the variability of the replicate data is determined to meet quality control requirements, then the sampling method is approved. If not, then an evaluation of quality control for the analytical method employed and data for concurrent testing of replicate, laboratory subsamples is used to determine if the main source of error is associated with the laboratory or



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with the collection of samples in the field.

Mining experts determined that the main source of error in data was associated with the physical collection of the sample in the field. This was followed by processing of the sample at the laboratory and collection of a subsample for analysis. Analytical error associated with testing of subsamples was determined to be a relatively minor source of error in most cases. If data for laboratory replicate subsamples collected from the same sample were reasonably similar, then error could normally be attributed to the method used to collect the samples in the field. If the laboratory replicate data for individual samples were not in agreement, then the sample processing and subsampling methods were reviewed and adjusted until data variability was reduced to an acceptable level. If unacceptable variability between data for field replicate samples persisted, then the method used to collect samples was reviewed and adjusted. This typically include the need to prepare larger-mass samples from a greater number of increments.

The systematic approach described above for testing of crushed ore dramatically reduced sample data error in the mineral exploration and extraction industry. With only a few modifications, the same approaches can be used to improve data quality and reliability in the environmental industry.

D.2 APPLICATION TO ENVIRONMENTAL SAMPLING

Sample collection methods developed by the minerals industry and summarized in Gy's Theory of Sampling apply to environmental testing of soil and sediment as well as to other media made up of an essentially infinite number of small particles (AFFCO 2015). Although the project objectives and economic incentives are different, the systematic approach used to reliably estimate the mean concentration of a contaminant in a designated DU area and volume of soil or sediment is essentially identical to the approach used to estimate the mean concentration (grade) of a commodity such as gold in a designated lot of crushed ore (Table D-1).



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Table D-1. Comparison of investigation objectives and methods in the mining versus environmental industries.

Factors	Mining Industry	Environment Industry
Investigation Target:	Commodities	Contaminants
Example Media:	Crushed Ore	Soil and Sediment
Field Characterization:	Designation of Lots	Designation of Decision Units (DUs)
Basis:	<ul style="list-style-type: none"> • Economic Viability • Optimization of Commodity Extraction 	<ul style="list-style-type: none"> • Risk to Human Health and the Environment • Optimization of remedial actions
Sample Collection:	Multi Increment Samples	Multi Increment Samples
¹Typical Sample Mass:	100s to 1,000 kilograms	1 to 3 kilograms
²Quality Control:	<ul style="list-style-type: none"> • Field Lot Replicates • Laboratory Subsample Replicates • ¹Laboratory Analysis QC 	<ul style="list-style-type: none"> • Field DU Replicates • Laboratory Subsample Replicates • ¹Laboratory Analysis QC
³Required Replicate Data Precision:	RSD <1-5%	RSD <35%

Notes:

1. Minimum 300 grams collected for samples to be tested for VOCs.
2. Includes matrix spikes, replicate analysis of same subsample, etc.
3. Relative Standard Deviation of replicate samples. Higher RSDs might be acceptable for both industries depending on the acceptable margin of error for decision making and hedge or safety factors built into decision criteria.

A higher tolerance for data error is normally acceptable in the environmental industry, where order-of-magnitude or large margins of safety are normally built into screening levels and risk assessments. As discussed in Appendix L, a Relative Standard Deviation of 35% and even higher is normally acceptable for field replicate sample data (15% for laboratory subsample replicate data). This allows for the collection of much smaller samples in the field, typically just 1 to 3 kilograms.

As discussed in Section 3 of the TGM, the recommended approach for the risk-based investigation of contaminated soil can be summarized in nine, systematic steps (refer also to noted appendices):

- Step 1: Define investigation scope and establish preliminary Conceptual Site Model (Appendix B);
- Step 2: Identify potentially hazardous chemicals to be targeted for testing (Appendix B);
- Step 3: Determine data information needs in terms of nature of risks associated specific chemicals and/or optimization of anticipated remedial actions (Appendix B);



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- Step 4: Designate well-thought-out Decision Unit areas and volumes of soil for testing that will provide the data necessary to meet the stated information needs (Appendix C);
- Step 5: Specify Decision Statements for each DU that describe the action to be taken upon receipt of sample data (Appendices B and C);
- Step 6: Develop and implement the sample collection and analysis plan, including the collection of a Multi Increment Sample from each DU in the field and processing of samples at the laboratory (Appendices D, F, G, H, I, J, K);
- Step 7: Assess data quality based on a review of the sample collection and analysis methods implemented and an evaluation of replicate field and laboratory data to test overall sampling method precision (Appendix L); and
- Step 8: Determine potential environmental hazards based on data for each DU and the review of overall data quality (Appendix B);
- Step 9: Update the Conceptual Site Model and propose additional actions (Appendices B and L).

Development of a similar, nine-step, systematic process for the reliable investigation and characterization of commodity ores only requires modification of the intent of the investigation and according modification of the objectives of the investigation, the basis of DUs and the decisions to be made upon receipt of the sample data.



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APPENDIX E. USE AND MISUSE OF DISCRETE SAMPLES



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APPENDIX E. USE AND MISUSE OF DISCRETE SAMPLE DATA

E.1 BACKGROUND AND KEY ASSUMPTIONS

A review of the origin of “discrete” or “grab” sampling methods for the investigation of contaminated soil and sediment is provided in Brewer et al. (2017a,b; refer to supplemental information included with paper). A “discrete sample” refers to the collection of a small mass of soil, typically 100 to 200 g, from a single point within an area targeted for investigation. At the laboratory, a random 1 g to 10 g subsample is then collected from the original sample and tested for contaminants of concern. Discrete samples are not routinely processed in a manner that ensures the resulting data are representative of the sample provided as a whole. An attempt might be made to “homogenize” a sample by simple stirring, but this can cause fine and potentially more contaminated particles to settle to the bottom of the container and bias data.

The collection of discrete samples played an important role in site investigation guidance published by the United States Environmental Protection Agency (USEPA) in the 1980s (USEPA 1985, 1986; Gilbert 1987). The Toxic Substances Control Act (TSCA) specifically requires the use of discrete samples for final, decision making purposes. A discussion of the use of DU-MIS methods under TSCA is provided in Appendix N. These guidance documents and regulations were designed to identify and characterize localized areas or “hot spots” of contaminated soil. This reflects the current concept of “Source Area” DUs discussed in Section 3.3.2 and Appendix C. Individual sample points were to be spaced at a distance less than the width or length of the targeted source area size of interest.

Environmental experts at the time were most familiar with the collection of discrete/grab samples to test industrial waste. The concentration of chemicals in industrial waste, especially liquid waste, are normally very consistent as long as the process itself does not change. Under these conditions, a grab sample of limited mass from a random point within a targeted waste stream can be assumed to represent the larger-scale waste stream as a whole reasonably well.

The preparers of USEPA sampling guidance similarly assumed that the concentrations of a chemical in soil contaminated by a release of industrial waste would likewise be relatively uniform (notations added):

“The implicit assumption (in the use of grids of discrete soil samples) that residual contamination is equally likely to be present anywhere within the sampling area is reasonable (USEPA 1985; refer also to USEPA 1986).”

“The (discrete soil sampling) method makes use of prior information to divide the target population into subgroups (i.e., DUs) that are internally homogeneous (Gilbert 1987).”

“Any sample located within the contaminated zone will identify the contamination (USEPA 1987).”

“When there is little distance between points it is expected that there will be little variability between points (USEPA 1989a).”

These assumptions greatly simplified the preparation of guidance for the investigation of contaminated soil, since data for single samples could be used to determine if soil in the immediate area of the sample collection point was contaminated above levels of potential concern. Surprisingly, however, the hypothesized relative



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uniformity of contaminants within a source area was never thoroughly tested in the field Brewer et al. (2017b).

The guidance also reflects a mistaken belief that risk-based screening levels for soil that were being developed at the time applied to any testable mass of soil. As discussed in concurrent USEPA guidance, risk is instead assessed based on the mean concentration of the contaminant for a specified “exposure area” and by default “exposure volume” of soil as a whole, such as a school playground or an area of exposed soil frequently contacted by workers (USEPA 1987, 1988a, 1989a,b,c,d, 1991, 1992, 2014; refer to Section 3.3 and Appendices B and C). The concentration of the contaminant associated with any given small mass of soil within this area is irrelevant in terms or assessment of risk.

This is true for assessment of both chronic risk, the basis of most screening levels, as well as hypothetical acute risk (refer to Brewer et al. 2017b). Concerns about “dilution” of contaminant concentrations and underestimation of risk based on “composite” sample data and the need to test individual, discrete points were unfounded. Indeed, all concentrations reported by the laboratory represent a “diluted” average of the concentration associated with the collection of individual particles tested. The only question is the designation of a DU of appropriate size to address the nature of the risk question (refer to main guidance and Appendix C).

E.2 FIELD STUDY OF DISCRETE SAMPLE DATA RELIABILITY

A detailed field study of discrete sample variability and reliability was carried out by the State of Hawaii in 2014 and 2015 (HIDOH 2015a,b; Brewer et al. 2017a,b). The research was funded through grants provided by the USEPA.

Three sites ranging in area from 150 m² to 500 m² and known to be contaminated were selected for the study. Hundreds of discrete samples were collected and tested from each site. The first site was contaminated by long-term releases of arsenic-contaminated wastewater. The second site was contaminated by mixing lead-contaminated incinerator ash in soil used as fill material. The third site was contaminated by releases of electrical equipment oil that contained polychlorinated biphenyls (PCBs). The upper 15 cm of soil was targeted for testing.

Twenty-four grid points were established at each study site. Variability of contaminant concentrations between closely spaced samples, referred to as “inter-sample variability,” was evaluated by independent testing of five samples collected within a one meter-square area at each grid point. Variability of contaminant concentrations within individual samples, referred to as “intra-sample variability”, was evaluated by testing ten separate subsamples of soil, one of the samples collected at each point. The combined variability between co-located samples and within individual samples reflects the total random variability of discrete sample data that might be expected around a single collection point in the field.

The results of the study are summarized in Figure E-1. The study data demonstrated that the concentration of a contaminant reported by a laboratory for a given discrete soil sample is random within a range of possibilities for the individual sampling point. The magnitude of variability depends on both the type and nature of the chemical released. The predicted variability between co-located samples at the arsenic site was comparatively low, with an average two-fold difference between the maximum and minimum concentration of arsenic in samples collected around a single point. Average variability between co-located samples at the



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lead-contaminated site was predicted to be seven-fold. The predicted variability between co-located samples at the PCB site was the highest, with an average difference of 39-fold and in some cases greater than two orders of magnitude.

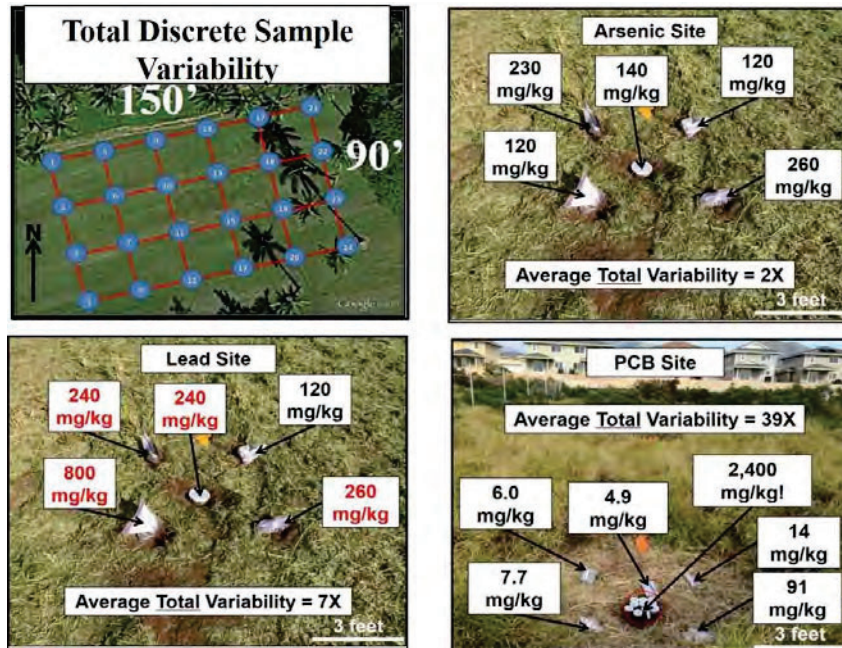


Figure E-1. Measured, random variability between co-located, discrete soil samples at three sites included in the State of Hawaii field study of discrete sample reliability (Brewer et al. 2017a).

Repeat testing of an exposure area can similarly lead to significantly different estimates of the mean concentration of the contaminant and the associated risk based on a single set of discrete samples (Table E-1; see Brewer et al. 2017a). The mean concentration of arsenic and lead calculated based on independent ten-sample sets of discrete data for the arsenic and lead study sites varied by a factor of approximately two. The mean concentration of PCBs varied by over two orders of magnitude. Brewer et al. (2017b) point out that none of the calculated means is reliable, since none of the samples was collected in a manner that ensured representativeness of actual field conditions (refer to Appendix L).

Table E-1. Variability of estimated mean based on repeat testing of ten discrete samples collected from the same area (from Brewer et al. 2017a).

Study Site	Range Mean (mg/kg)	Range 95% UCL (mg/kg)
Site A (arsenic)	218 to 395	278 to 535
Site B (lead)	170 to 356	215 to 469
Site C (PCBs)	5 to 1,025	9.4 to >1,000,000



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Random variability of contaminant concentrations between co-located samples and between replicate subsamples collected at the laboratory was well known but not well understood. The random nature of a mean contaminant concentration calculated from a single set of discrete sample data went largely unrecognized, however. This was due to the lack of routine collection of independent replicate sets of discrete samples from a targeted area of concern for comparison. The periodic collection of replicate sample data to test the precision of the overall sampling method is, in contrast, a required aspect of DU-MIS investigation methods (refer to Appendix L).

E.3 IMPLICATIONS OF FOR RELIANCE ON DISCRETE SAMPLE DATA

The results of the Hawaii field study help explain the source of confusion and delays in the completion of environmental projects. The field studies clearly demonstrate that data for a sample collected from a single point are not reliability representative of the surrounding area as a whole. Sample preparation methods at the laboratory are similarly unlikely to capture and represent distributional heterogeneity within the sample itself. As a result, laboratory data are not reliably representative of the sample submitted and the sample submitted is not reliably representative of the area where it was collected. Error in decision making regarding risk or the need for remediation is therefore unknown.

Warnings about the unreliability of discrete sample data are included in numerous USEPA documents and other publications in the 1990s and early 2000s. The USEPA guidance document *Preparation of Soil Sampling Protocols* (USEPA 1992) specifically recommends the use of “sampling units,” now referred to as “Decision Units,” and consideration of Gy’s Theory of Sampling for site characterization:

“Gy’s theory makes use of the concept of sample correctness which is a primary structural property... A sample is correct when all particles in a randomly chosen sampling unit have the same probability of being selected for inclusion in the sample...”

The authors caution reliance on discrete sample data for final decision making (USEPA 1992):

“‘Grab samples’ or judgmental samples lack the component of correctness; therefore, they are biased. The so-called grab sample is not really a sample but a specimen of the material that might or might not be representative of the sampling unit. Great care must be exercised when interpreting the meaning of these samples.”

E.3.1 Site Characterization Error

Figure E-2 depicts hypothetical isoconcentration patterns that might be generated by a geostatistical mapping program. In this example, the color black is intended to represent areas and volumes of soil that exceed the risk-based screening level for direct exposure. The accuracy of such maps and cross sections is reliant on two critical assumptions regarding the nature of contaminants in the soil: 1) Data for individual points are representative of the immediately surrounding soil and 2) The concentration trend between individual points is linear. Neither of these requirements are have been demonstrated to be reliably true for either contaminated soil or sediment, calling into question the reliability of the maps for assessment of risk or



development of remedial actions.

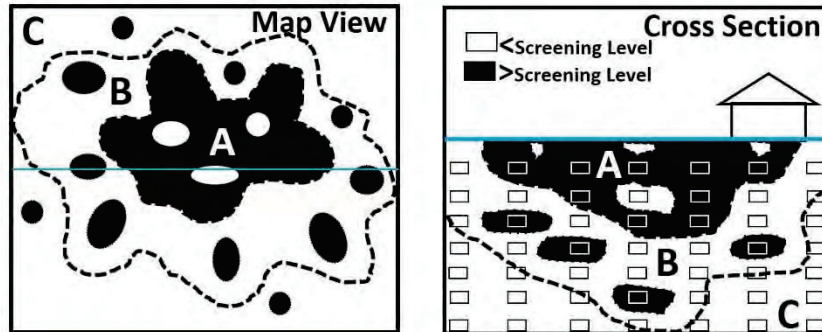


Figure E-2. Hypothetical, isoconcentration map and cross section depicting artificial hot spots and cold spots caused by random, small-scale variability of contaminant concentrations above and below the screening level at the scale of a discrete and laboratory subsample (see Figure E-1).

As demonstrated by Brewer et al. (2017b), testing of a co-located sample from the same location within a depicted “hot” or “cold” spot or even an alternative subsample from the same sample could yield an entirely different concentration and map pattern. The larger-scale pattern associated with Zone A in Figure E-2 is assumed to be somewhat reliable but includes artificial cold spots due to discrete sample data points that fell below the target screening level. Zone B is characterized by artificial, isolated and random hot spots centered on discrete sample points that by random chance fell above the screening level rather than more accurately depicting the entire zone as contaminated. Zone C is again characterized by a small number of false, isolated hot spots.

Removal of any of the false hot spots in Zones B and C would be unlikely to cause the mean contaminant concentration for each area to be significantly reduced. Failure to remove the false cold spots in Zone A could result in a significantly higher post-remediation mean contaminant concentration for that area that otherwise predicted by the discrete sample data.

While large-scale patterns generated by a mapping program based on large clusters of points can be reasonably accurate, such maps can present a very false sense of small-scale data resolution and contaminant concentration predictability within the mapped area. This can lead to significant errors in the assessment of risk and the development of remedial action plans.

The potential for such errors was pointed out in multiple, early USEPA guidance documents but largely ignored or misunderstood (see Brewer et al. 2017b). As discussed in Appendix D, Multi Increment (MI) sampling methods, which form the basis of this guidance document, were specifically developed to overcome these inherent shortcomings of discrete sampling methods and provide more reliable and defensible data for environmental investigations.

E.3.2 Risk Assessment Error

Risk is assessed based on the mean or “true” concentration of the contaminant for the targeted DU area and volume of soil or other particulate matter as a whole (USEPA 1987, 1988a, 1989a,b,c,d, 1991, 1992, 2014;



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refer to Section 3.6 and Appendices B and C). Reliance on a single set of discrete sample data to estimate a mean and assess risk is hampered by multiple limitations (Brewer et al. 2017b): 1) Error in assessment of the lateral and vertical extent of contamination (see Section E.3.1); 2) Inadequate number of points represented to reliably capture distributional heterogeneity; 3) Inadequate mass of soil collected in field; 4) Inadequate processing of samples in laboratory; and 5) Lack of replicate sets of discrete sample data to assess precision of calculated mean and the overall sampling method.

A 95% UCL of the mean is often used by risk assessors to compensate for the oftentimes highly variable discrete sample data provided to them. As discussed in Appendix D, decades of experience in the mining industry and detailed field studies have clearly demonstrated this approach to be unreliable. This is because the 95% UCL only addresses potential error in the statistical test employed to estimate a mean for the data set provided. Error in the data set itself due to poor sample collection methods in the field can only be evaluated through the collection of replicate sets of discrete sample data for comparison.

This is not traditionally done for discrete samples due to the cost involved and erroneous assumptions regarding the application of classical statistical methods to particulate matter. Error in assessment of risk based on reliance on a single set of discrete sample data is therefore unknown. Comparison of 95% UCLs calculated for replicate sets of discrete sample data collected from the same DU had demonstrated that this error can indeed be very high (see Brewer et al. 2017a,b).

Collection of a single, MI sample in accordance with Gy's Theory of Sampling to address compositional and distributional heterogeneity replaces and significantly improves on the use of a 95% UCL calculated for a single set of discrete sample data. Testing of field sampling error through the collection of replicate samples is, in contrast to discrete sampling methods, an integral part of MI sampling methods. While possible, calculation and use of a 95% UCL for replicate MI sample data is discouraged except under limited circumstances and by risk assessors trained with training in Gy's Theory of Sampling (refer to Appendix L).

E.4 CONTAMINATION ZONES

The three distinct zones of contamination depicted in Figure E-2 are characteristic of many contaminated sites. Large-scale contaminant concentrations patterns generated by computer mapping programs between contaminant zones can be real. Small-scale patterns within individual zones are often artificial and not representative of actual conditions in the field. Recognizing these zones at sites where discrete sample data are available and understanding the limitations of the data can aid in the design of a more detailed DU-MIS investigation as well as assist in initial remediation actions.

Figure E-3 depicts the random, small-scale variability at the scale of a discrete sample within each of the three zones of heterogeneity common to most contaminated sites. Zone A represents the source area, where the main mass of contamination was released or buried. The mean concentration of the contaminant within this zone as a whole is well above the target screening level, indicating that remediation is required. The concentration of the contaminant at the majority of potential discrete sample points within this zone also exceeds the target screening level (black squares in Figure E-3). It is possible, however, that the concentration at some discrete points within the mass of soil will be below the screening level (white squares in Figure E-3). These points represent false or artificial "cold spots." The volume of such spots is greatly exaggerated by



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isoconcentration mapping contours (see Figure E-2; Brewer et al. 2017a,b).

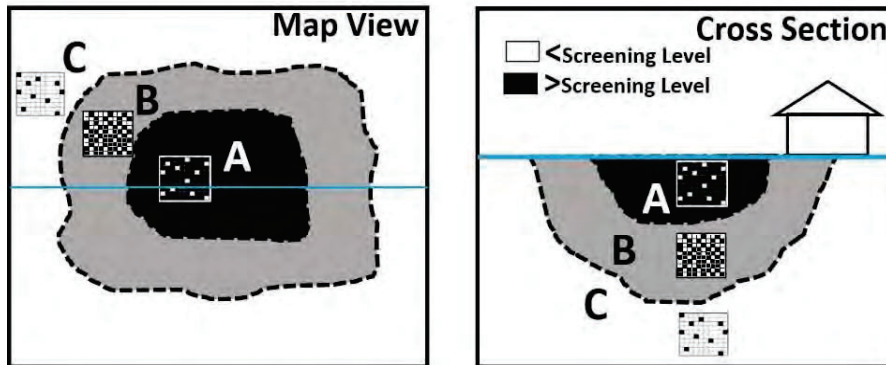


Figure E-3. Three zones of contaminant heterogeneity common to many sites. Zone A (heavily contaminated): Mean concentration above screening level; Zone B (moderately contaminated): Mean concentration can be either above or below screening level; Zone C (low contamination): Mean concentration below screening level. Inserts represent hypothetical, random discrete samples with concentrations of the contaminant above (black) or below (white) the screening level. SL=Screening Level.

Zone C represents the clean periphery area, where the mean concentration of the contaminant is below the target screening level. Within this zone, the concentration of the contaminant in soil at majority of discrete points will be well below the target screening level. It is possible, however that the concentration of the contaminant at some discrete points will be above the screening level (black spots in figure). Such “hot spots” are again artificial and reflect the heterogeneous nature of contaminant distribution within this area. The volume of such spots is similarly exaggerated by isoconcentration mapping contours and can lead to erroneous decisions for surgical removal of hot spots, even though no remedial action is required for this area (see Figure E-2).

The mean concentration of the contaminant within Zone B of Figure E-3 is higher than Zone C but lower than in Zone A and might or might not exceed the target screening level. This zone is characterized by a mix of discrete sample data both above and below the target screening level. Data for co-located samples collected around individual points can fall both below and above the target screening levels. Isoconcentration mapping programs are unable to account for this small-scale, random variability. As a result, the programs again generate a false pattern of large, seemingly isolated “hot spots” and “cold spots” with the area (see Figure E-2). If an independent set of co-located, discrete samples was collected from the same area then a similar pattern of isolated “hot spots” and “cold spots” would appear, but they would be in different places.

This characteristic makes Zone B-type contamination especially difficult to characterize using discrete sample data. A failure to recognize false “hot spots” on maps of discrete sample data can lead to erroneous attempts surgically remove small areas of presumed contaminated soil to reduce the overall mean concentration of the contaminant for the targeted area. Confirmation samples collected around such excavations often surprisingly exceed the screening level, resulting in decisions to continue excavation with no clear end point in site. Even



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after removal of all apparent hot spots, retesting of the area using more reliable and risk-based DU-MIS sampling methods will often indicate that removal of the soil did not result in a substantial reduction in the mean contaminant concentration or in the associated risk (refer to Brewer et al. 2017b).

E.5 USE OF DISCRETE SAMPLE DATA FOR PRELIMINARY SCREENING

Although discrete sample data are not reliable for final decision, existing sample data can sometimes be useful for preliminary identification of large areas of contamination and designation of DUs for the collection of more reliable DU-MIS data. This can aid in initial removal of heavy contamination or in the designation of DUs to help isolate areas of heavy contamination for optimization of remediation. The boundaries depicted between areas of heavy, moderate and low-level contamination should be considered preliminary, however, and verified with more reliable DU-MIS confirmation data. As discussed in Appendix E, seemingly isolated “hot spots” and “cold spots” based on a single or otherwise small subset of discrete sample data are likely to be false artifacts of the mapping programs inability to consider random, small-scale heterogeneity and should generally be ignored.

Note that this is true for any type of isoconcentration map based on discrete, environmental sample data, including maps for subsurface soil vapor and groundwater data. Specific errors often encountered in unadjusted, isocontour maps include:

- Artificial "hot spots" and "cold spots" caused by random, small-scale variability of contaminant concentrations at the scale of a discrete sample;
- Erroneous "zero" isocontours around the perimeter of contaminated areas due a lack of outward data points;
- Inherent lack of precision of isocontour placement;
- False conclusions regarding risk; and
- False conclusions regarding the need for or adequate completion of remediation.

Unrecognized, these errors can lead to a false sense of precision in computer-generated isocontour maps and lead to erroneous decisions regarding the need to continue or halt site investigations or remedial actions. This includes calls for remediation of isolated "hot spots" based on single or small numbers of discrete samples and premature termination of site investigations or remedial actions due to false "cold spots" in the discrete sample data.

Isocontour maps should be adjusted to reflect site knowledge and professional judgment not reflected in computer-generated maps. Such adjustments are not possible in existing computer programs and must be done by hand. Boundaries between apparent large-scale patterns should necessarily be dashed. Small-scale heterogeneity within larger-scale patterns generated by small numbers of discrete sample points should not be presented on final maps included in the report.



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For example, Figure E-4 depicts a four-hectare site formerly used for storing and mixing pesticides. The northern area of the site was known to be heavily contaminated with arsenic based on previous collection of both discrete and MI samples. The exact area of elevated arsenic was uncertain based on previous testing although the area of the former mixing shed was most suspect. No obvious signs of contamination were recognizable in the field.

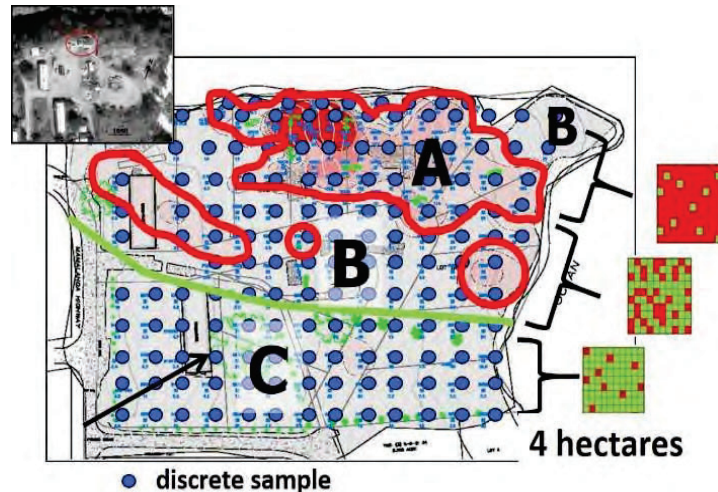


Figure E-4. Unadjusted isoconcentration map from discrete sample arsenic data at a four-hectare, former pesticide storage site. Red-shaded areas denote sample points that exceeded a screening level of 20 mg/kg.

Approximately 90, large-mass, discrete surface soil samples (0 to 15 cm) were collected from a 15 m grid across the site. Each discrete sample was collected from multiple points around each grid point in order to help address random, small-scale heterogeneity and increase data representativeness. Samples were analyzed using a portable XRF. A subset of samples was analyzed in a laboratory for comparison.

As can be seen in the figure, the XRF helped identify at least one large source area of arsenic-contaminated soil in the northern part of the site. Smaller clusters of discrete samples with higher reported levels of arsenic might or might not be reflective of actual conditions in the field. False patterns of higher and lower levels of contamination can be produced by samples that are too small to capture and smooth out random heterogeneity of contaminant distribution in soil (refer to Appendix E).

Three distinct areas of arsenic contamination are apparent (Figure E-5):

- A) Concentration of arsenic in the majority of discrete samples below screening level 20 mg/kg, with occasional "outliers" that exceed this value;
- B) Concentration of arsenic randomly above and below 20 mg/kg; and
- C) Concentration of arsenic above 20 mg/kg in the majority of discrete samples with random "outliers" below this value.



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The most heavily contaminated soil in Area C corresponds to location of a former pesticide mixing area at the facility (denoted by red circle on the inserted 1979 aerial photo). Smaller-scale patterns of apparent hot spots within Area B are interpreted to be artifacts of random, small-scale heterogeneity and might or might not be reproducible.

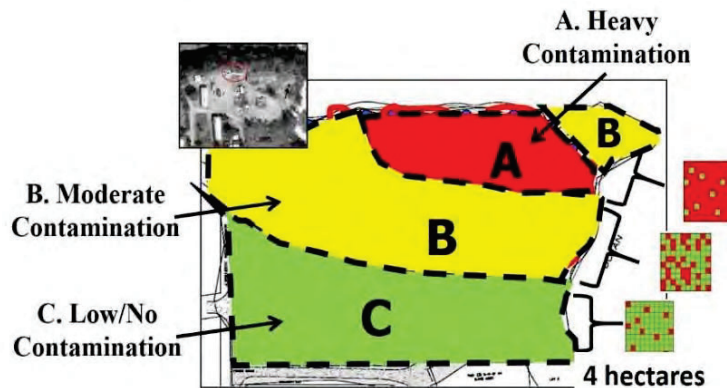


Figure E-5. Adjusted Arsenic Isoconcentration Map for a Former Pesticide Storage Site. The adjusted map more accurately reflects the resolution of arsenic distribution in soil across the site that can be reliably extracted from the discrete

These types of discrete sample data maps can be used to help designate DUs and carry out a more reliable and higher resolution characterization of the site. Figure E-6 depicts Exposure Area DUs designated in Zone C of the site based on the maximum-allowed exposure area agreed to by the risk assessor (e.g., 0.5 hectares). Smaller DUs are designated in the heavily contaminated Zone A area. A mix of DU sizes are placed in the Zone B area, based on the judgement of the field team. As an alternative, removal of the soil in the Zone A can occur prior to additional sample collection and larger exposure area-size DUs designated in the area for confirmation of cleanup.



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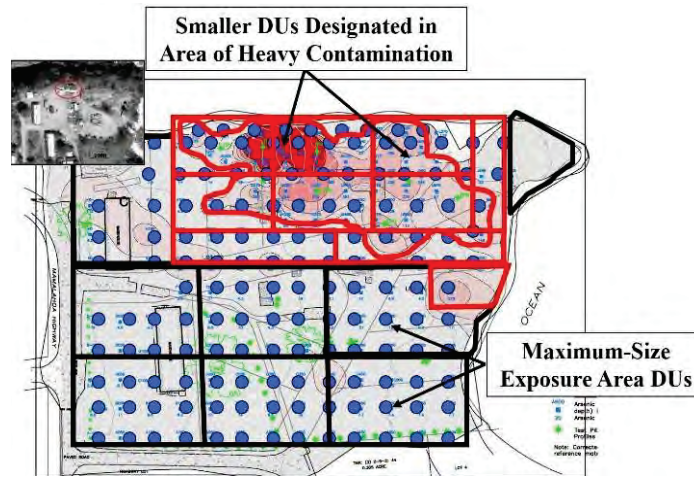


Figure E-6. Designation of Decision Units for collection of Multi Increment soil samples based on contamination zones recognized from discrete sample data.

Preliminary maps could also be used to carry out initial remediation actions, for example removal of soil from the heavily contaminated area, followed up with a DU-MIS investigation to confirm removal and assess the need for additional actions. The cost-benefit of basing initial remedial actions on discrete sample data requires significant experience and coordination between both the risk assessor and the remediation specialist.



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APPENDIX F. COLLECTION OF SURFACE SOIL SAMPLES**

APPENDIX F. COLLECTION OF SURFACE SOIL SAMPLES



APPENDIX F. COLLECTION OF SURFACE SOIL SAMPLES

F.1 LOCATING DU INCREMENT COLLECTION POINTS

Use a Global Positioning System (GPS) device to record the corners of the Decision Units (DUs) or, if irregular, enough points to delineate the DU shape. Use the GPS data and field measurements to prepare a to-scale map of all DU shapes and locations. Include a bar scale and compass point. Note that GPS location information can be several meters off. Use of tape measures or equivalent approaches in the field is recommended to document the exact dimensions of a DU. If there are buildings or other fixed structures on the site near the DUs, use physical measurements from the structures to assist in documenting the location of the DUs in the field. Satellite or aerial images that depict the DUs are also very useful and should be included if easily available.

Increment collection points are determined by hypothetically dividing the DU in small, square cells equal in number to the target number of increments (Figure F-1). A single increment is collected from the center point of each cell.

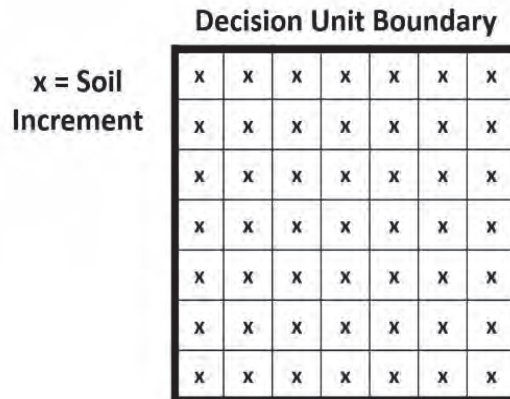


Figure F-1. Example DU increment cells for collection of a 49-increment, Multi Increment soil sample.

The dimensions of each increment collection cell are calculated using the following equation (see Section 3.6.2):

$$\text{Increment Spacing} = \sqrt{\frac{\text{DU Area}}{\# \text{ of Increment Points}}} \quad \text{Eq 1).$$

This simulates division of the DU into individual increment collection cells, with a single increment collected from the center of each cell. After calculating the square root of this area, the length of each side of the cell is obtained (assuming square cells). Individual increment collection points are spaced at a distance equal to the side of each collection cell. The same spacing applies to subsurface increments if the thickness of the DU exceeds this value.

Documenting or flagging the location of every individual increment collected within a DU is not necessary,



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although spacing and number of increments collected per DU should be stated in the site investigation report. Flagging the locations of increment rows along two parallel sides of a DU and progressively moving a tape measure marked with increment collection locations (or careful pacing) between opposing flags across the DU as increments are collected can significantly expedite field work. A few rows of flags can also be placed within large or long DUs as needed to help guide sample collection.

Use of a GPS in the absence of flags can expedite the location and collection of increments for very large DUs (e.g., tens or hundreds of hectares), where error in increment location within a few meters is acceptable and where pacing might not be accurate or practical due to vegetation, topography, or other access issue.

Increments should be collected in an evenly spaced zig-zag pattern in long narrow DUs, as depicted in Figure F-2. A tape measure or rope with flags tied at the appropriate spacing can be placed in the DU to assist in increment collection, without the need to flag individual points. Ensure equal increment spacing in all directions.

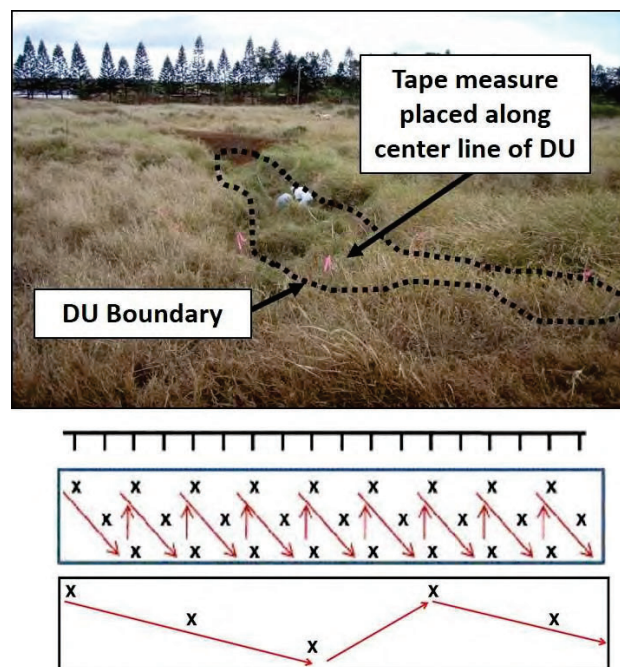


Figure F-2. Collection of Increments in a Long, Narrow DU. Increment collection pattern options noted depending on DU width to increment spacing.

F.2 INCREMENT AND BULK SAMPLE COLLECTION

Collect a single increment from a random point within the first cell, for example the center. Collect a single increment from the same point in the remaining cells. (Figure F-3). Combine all increments into a single sample and place in an appropriate sample container, most commonly a heavy-duty freezer bag. Alternative methods for the collection of independent, replicate samples from the same DU are discussed in Appendix L.



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Figure F-3. Multi Increment Sample Collection
Collect an "increment" of soil at each point. In this example (very soft soils), a sampling tube is used to extract a cylindrical volume of soil to a depth of approximately 10 cm. Each increment typically weighs 20 to 50 g. Subsequent increments for the target DU are placed in the same container.

Collect core-shaped increments to ensure unbiased, equal representation of the entire thickness of the subject DU. (Figure F-4). Core-shaped increments can be collected using a soil coring sampler, soil sampling tubes (both preferred), or drills with specialized bits. This ensures equal coverage at all depths of the targeted DU layer. Hand trowels tend to produce wedge-shaped increments, with a bias towards the upper section of the targeted soil and are generally not recommended. If used, an effort should be made to extract core-shaped increments. Using the wrong tools or collecting a sample that contains more soil particles from the top of the targeted DU than the bottom will lead to biased sample results and potentially non-representative data, due to a heterogeneous vertical distribution of contaminants in the soil.

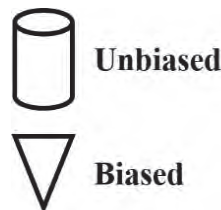


Figure F-4. Unbiased, core-shaped increments accurately represent the entire thickness of the Decision Unit. Wedge-shaped increments are biased to the upper levels of soil.



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Determine the appropriate increment mass by dividing the target, bulk sample mass by the number of increments to be included in the sample. For example, fifty, 40-gram increments will produce a bulk soil sample with a mass of 2 kg, within the default target mass range of 1 to 3 kg (Figure F-5). Avoid the need to collect a smaller subsample from an excessively large primary sample in the field beyond removal of sticks and large rocks, as this will introduce additional and unknowable error to the resulting laboratory data. Increments for samples to be tested for VOCs should be placed in methanol or another preservation method employed. Refer to Appendix I for additional details.



Figure F-5. Increments combined to prepare a 1 to 3 kg Multi Increment sample.

Do not attempt to collect co-located increments or "splits" of initially collected increments for later, individual testing. The random, small-scale variability of contaminant concentrations within small masses of soil negates the reliability of any given increment to be representative of the immediately surrounding soil (refer to Appendix D). Testing of smaller groupings of increments collected within a single DU (e.g., four groupings of ten increments each) is likewise invalid, since the resulting data cannot be assumed to be representative of the area from which the increments were collected (i.e., number of increments and bulk sample mass too small). Doing so is wasteful of both field time and analytical budgets.

If a greater resolution of contaminant distribution might be required for a targeted area then the initial designated DU should be subdivided into smaller DUs from the start, with a Multi Increment (MI) sample collected from each area (see Appendix C; refer also to Section 3.3). This will avoid delays and mistakes over data interpretation in the future should not add significantly to the time required to collect samples or the overall cost of the project.

The same holds true in cases where significant contamination is identified in a large DU where contamination was not initially anticipated. If a greater resolution is subsequently desired to optimize remedial actions, then the DU should be subdivided accordingly and a proper MI sample collected from each new DU.

F.3 SAMPLE COLLECTION TOOLS AND FIELD METHODS

The collection of samples reflects the culmination of significant research and planning prior to initial field activities. It is important that the samples be as technically defensible and representative of site conditions as possible. The tool(s) selected for sample collection must ensure that soil increments are core-shaped or



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otherwise not biased with respect to depth and of relatively equal mass, and that mass of individual increments be adequate to collectively meet the target bulk mass for the resulting samples.

The collection of samples from exposed surface soil should be relatively straight forward with proper planning and tools. The top 10 to 15 cm of soil is typically designated as a DU for sample collection and characterization of surface spills as well as assessment of direct exposure risk (USEPA, 2011; CAEPA, 2013). The same tool used for surface soils can often be used to collect deeper, near-surface soil samples (e.g., 15 to 25 cm) if included in the site investigation objectives or necessary for vertical delineation of contamination. The collection of samples from DUs layers greater than one meter below the ground surface typically requires the use of drills or other equipment (see Appendix G). Although not typically carried out for surface soils, the field use of methanol or alternative approaches for the collection of MI sample to be tested for VOCs are described in Appendix I.

Soil type, compaction, abundance of rocks, and increment depth typically drive selection of the most appropriate tool for a given site. A simple sampling tube is generally most appropriate for relatively non-compacted, fine-grained soils. Sampling tubes with core catchers or using a trowel might be most appropriate for very loose, sandy soil, although care must be taken with the latter to collect increments that are not biased with depth. An electric drill with an auger bit specifically designed to remove cuttings can allow the rapid collection of increments and samples in fine-grained, semi-compact soils. A sample tube with a slide hammer, a mattock, electric hammer, or in some cases even a backhoe might be required to collect samples in very compact or very gravelly soil.

The following, more detailed discussion of sampling collection methods is presented in terms of tool options for various soil types and field conditions. The examples provided are based in part on the field experience of the authors of this guidance. An inspection of the site prior to sample collection to assess soil conditions is imperative. Multiple types of tools should be taken when actual field work commences to address unanticipated field conditions and avoid delays, as well as ensure that representative samples can be collected.

Wire flags, marked tape measures or rope and rolling measures can be used to mark individual increment collection locations and expedite sample collection. Ensure that all sampling devices are of sufficient quality to avoid contamination of the samples being collected with paint, chrome plating, grease or other material. Sampling equipment should be either easy to decontaminate or cost-effective enough to be disposable.

F.3.1 Soft, Fine- to Coarse-Grained Soils

Manual sampling tubes that extract core-shaped increments are preferred for the collection of surface samples ("C" and "E" in Figure F-6) and screw-type drills ("A" in Figure F-6). Stainless steel soil coring devices rather than augers are recommended for the collection of MI samples. Screw-type drills ("A" in Figure F-6) and augers tools ("B" and "D" in Figure F-6) are less reliable for removal of core-shaped increments of consistent mass and should be avoided when possible.



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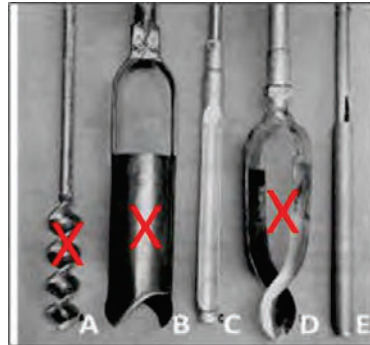


Figure F-6. Various manual soil coring sampling tools. Stainless steel sampling tubes (C & E) are preferred to control increment shape, mass and representativeness.

Small-diameter (e.g., 2 cm) sampling tubes are generally preferable in soft or loose, clayey to sandy soils that are not rocky (Figure F-7). The tubes are light weight, durable, simple to use and wash and minimize visual disturbance of a site after samples are collected. The tools are also very useful for the collection of samples from very large DUs, where considerable walking is required, and for cases when only one person is collecting samples. They also serve as a useful backup or alternative to a drill (see below) should battery, fuel or other equipment problems arise in the field. Importantly, 2-cm diameter tubes also allow for the collection of 50- to 75-gram increments from the upper 10 to 15 cm of soil, ideal for the collection of a 50-increment, 1 to 3 kg sample.



Figure F-7. Collection of increments with a sampling tube.

Upper Left Photo: Use of an open-sided sampling tube to collect surface increments in soft soils.

Upper Right Photo: Use a flat-headed screwdriver to remove soil increment from tube.

Bottom Photo: Final sample prepared by combined increments.

Larger diameter tools (e.g., 5 cm and larger) collect a proportionately larger amount of soil from a single location, resulting in a sample that could exceed the 3 kg recommended limit. Check with the laboratory to know the maximum total mass of bulk sample they are willing to accept and process using their standard MI sample processing protocols. Higher processing fees might be assessed for overly large samples. Select a core



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diameter that, in conjunction with the targeted DU depth/thickness, will result in a bulk sample mass above the recommended 1 kg minimum and below the laboratory manageable maximum. Note that larger mass bulk samples are generally more representative, so the choice of the sample core diameter is a balance between what is effective to utilize in the field, the amount of contaminant heterogeneity expected and cost for the laboratory processing.

Sampling tubes are utilized with extension rods and T-handle attachments (see Figure F-7). The tube is twisted into the ground to the desired depth, cutting into and retaining the soil in the hollow, open-face core barrel. The tube is then withdrawn to extract the increment from the ground. The increment is then removed and placed into a collection bucket for the DU sample. A flat-edged screwdriver or similar tool is useful for removing an increment of clayey or hard-packed soil.

A foot-assisted coring tool can also be useful for the collection of increments in soft but cohesive fine-grained soils (Figure F-8). The core barrel is pushed into the soil and retracted. The increment is extruded into the container with a spring-operated plunger. These tools can allow the very rapid collection of MI samples in uncompacted soils without gravel.



Figure F-8. Foot-operated core sampling device developed by the US Army Corps of Engineers (USACE 2007).



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Sampling tubes and core barrels such as those shown above do not work well in dry, loose soils that lack sufficient cohesion and will not allow particles to be retained or removed by the tool. Use of core catchers, if available for the coring device in use, might be an effective alternative. Alternatively, scoops with flat bottoms or similar hand tools are generally utilized in these conditions (Figure F-9). If scoops or trowels are utilized, it is important to remember that the goal is to remove similar-sized core-shaped increments in the DU (increments of uniform diameter through the vertical depth targeted), as well as limit increment mass to that needed to prepare a bulk 1 to 3 kg MI sample. The flat lip of the scoops shown in Figure F-9 can help ensure that wedge-shaped increments are not collected (see Figure F-5).



Figure F-9. Flat bottom scoops to collect soil increments from very loose soil.

F.3.2 Moderately Compact, Fine- to Coarse-Grained Soils

A cordless drill used in conjunction with a paper plate can be time and cost-effective for semi-compact to hard-packed soils without significant gravel, but can require two people unless a specially designed foot plate is used. Collection of a 50-increment sample can take as little as 10 to 15 minutes in open areas.

Figure F-10 depicts the use of a heavy-duty, battery-powered drill (e.g., Milwaukee or Grainger models) with a 28 volt battery and a 2.5 cm drill bit to collect sample increments. Cheaper and less durable drills intended for home use are prone to overheat or quickly drain batteries, especially in clayey or hard-packed soils. Commercial-grade drills can generally be used for up to 100 increments per battery charge. Field chargers are available for vehicles.



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Figure F-10. Use of cordless drill for sample collection.

To collect an increment, place a paper plate with a pre-cut 2.5 cm hole on top of the target point. The center of the plate must be held down to keep soil from piling up under the plate. Keep any tears in the paper around the hole pressed together to minimize soil loss. The use of pre-drilled, metallic or plastic plates is also possible provided that the plates do not contain contaminants of potential concern for the targeted DU. Soil sampling buckets that include a hole drilled in the base are also available from some vendors.

Keep the drill vertical and advance the bit to the target depth (e.g., marked with tape on bit) as soil piles up on the plate. Hold the drill firmly so that the drill doesn't lurch and strike the second person if gravel or hard-packed soil is encountered. Wear nitrile or latex gloves and change gloves between DUs (not shown in demonstration photos). Progress the drill to the targeted depth. Empty the soil into a sample container dedicated to the DU sample being collected (e.g., decontaminated plastic bucket) and move to the next increment collection point. The drill bit does not need to be decontaminated between increments to be combined into a single sample but must be decontaminated between replicate samples and between DUs.



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Use a hollow auger bit (e.g., Speedbore bit) to improve soil removal from the ground and control the collected soil mass (see Figure F-11). These bits generally produce 30 to 50 grams of soil per 15 cm depth. Hollow center auger bits typically work better in the field than wide-flight bits (Figure F-11). Hollow auger bits are designed to more efficiently remove cuttings from a boring without bringing up excess soil. The area where soil is removed from a boring is less easy to control with a wide-flight bit, and the bits can either bring up too much or too little soil with respect to the target increment mass.

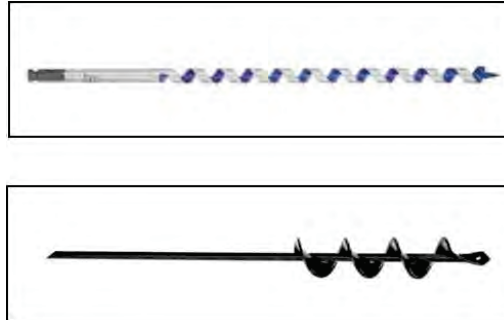


Figure F-11. Comparison of bit designs.

Upper Photo: Hollow-center auger bit (recommended; e.g., Speedbore auger).

Lower Photo: Wide-winged auger bit (not recommended).

Heavy-duty paper plates work well in the field under dry conditions (see Figure F-10). Pre-cut holes save field time; several plates might be required per DU if the plate tears excessively during increment collection. Wooden or metal plates might also be useful. Care should be taken not to get fragments of the plate into the sample due to potential interference in laboratory analysis from glue, plastic or metal. Sampling kits for drills are also available from soil testing supply stores. The kits include a metal foot plate with a drill guide that attaches to the base of a sampling bucket, with increments directly deposited into the bucket (e.g., AMS Compacted Soil Sampler).



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Heavier duty drills with portable generators are also an option (Figure F-12). This setup avoids the need for recharging batteries and can drill through more compact soils. These drills should only be used by an experienced person. The sudden torque of the drill if a rock or compact object is encountered can cause severe injury to the wrists. The use of an electric hammer drill with a spade bit is instead recommended (refer to Section F.3.3). Caution should also be taken to avoid bit sizes and designs that result in the collection of excessively large increments and bulk samples.



Figure F-12. High-Powered Drill and Portable Generator.

Left Photo: Using a high-powered Hilti drill with a portable generator (photo from Weston Solutions).

Right Photo: Using a Hilti drill and paper plate to collect soil increments.

A manual, hydraulic, or electric slide hammer can also be used to advance the coring device into shallow soil (Figure F-13). Slide hammers are effective for collecting harder packed soils but require considerable effort and energy to use in the field. A weighted slide hammer is physically lifted and lowered along a guide rod to drive the attached tool string into the ground to collect shallow soil samples.



Figure F-13. Use of a Slide Hammer to Collect Soil Increments.

Top Photo: A slide hammer assembly with rod and split spoon coring tool.

Lower Photos: Core barrel hammered into soil; removed core placed in increment collection bucket.



F.3.3 Very Compact or Gravelly Soil

A hammer-action electric drill with a spade bit is recommended for the collection of samples from very hard or gravelly soils (Figure F-14). Generators, drills and bits are usually available for rent from a local hardware store. Activate the drill and use the hammer action to insert the spade in the ground and to push the soil to one side as the bit moves toward the targeted depth, opening up a small gap in the ground (Figure F-15). Use a trowel to remove a core- or slab-shaped increment from the side of the opening, being careful to collect an equal amount of soil from all depths. Remove large rocks from the bulk MI sample as it is being collected. Ensure that an adequate amount of the target soil particle size (e.g., <math><2\text{ mm}</math>) is collected per increment to prepare a bulk sample. Collect a similar mass of soil at each increment collection point adequate to prepare a 1 to 3 kg bulk sample.



Figure F-14. Use of an Electric Hammer and Spade Bit.

Left Photos: Electric hammer (5 to 6 kg) connected to 4,000 watt gasoline-powered portable generator used to loosen dense, hard-packed soil.

Right Photo: Trowel used to collect increment from loosened soil.

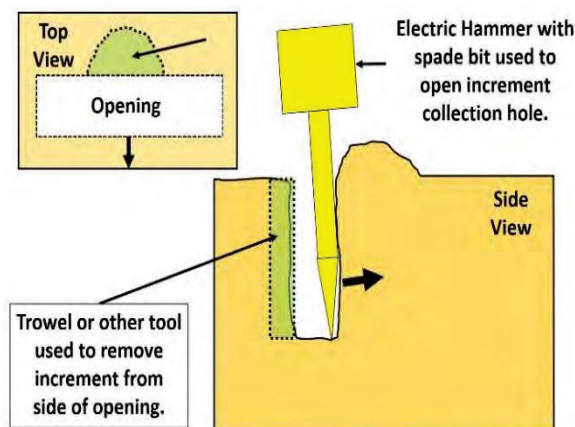


Figure F-15. Collection of increments soil loosened by a spade bit or heavy-duty hand tool.



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Other options include the use of a mattock or heavy-duty rock hammer to loosen a core-shaped volume of soil from the hard-packed ground (Figure F-16). A trowel is then used to collect the increment. This avoids the need to carry and rely on an electric drill and generator but adds significantly to the time and effort required to collect samples.



Figure F-16. Heavy duty hand tools.

Left Photo: Narrow spade, pry bar and mattock for collection of increments from hard-packed soil.

Right Photo: Breaker bar used to cut through old asphalt surface and collect soil increments.

Heavier duty hand tools can also be useful to break through hard surfaces or cut through concrete or asphalt to access underlying soil. This can be very labor intensive and can significantly slow down sample collection activities. Chisel or spade bits used with an electric hammer (see Figure F-14) or a tunnel bit used with an electric drill (Figure F-17) can be used to remove plugs of asphalt or concrete more rapidly. Ideally, this should be done ahead of time to expedite actual sample collection.



Figure F-17. Tunnel bit uses to cut through asphalt or concrete and access soil (Dewalt 7 cm diameter bit shown).

Tunnel bits are not recommended for the collection of increments from hard-packed or gravelly soil, despite the ability to extract a core-shaped plug of material. The mass of material collected inside a standard 7 cm bit exceeds that needed for the collection of a 1 to 3 kg sample, requiring subsampling of the bulk sample in the



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field or laboratory to reduce mass for additional processing. Removing soil and large gravel from the bit can also be tedious and time consuming.



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Designation of Decision Units (DUs) for the collection of subsurface Multi Increment (MI) samples is discussed in Section C-7 of Appendix C. "Subsurface" soil is generally considered to be soil that is below 25 to 100 cm depth or soil that is otherwise difficult to access with standard tools used for the collection of surface samples. A subsurface DU can be thought of as a surface DU that is covered with an additional layer of soil. The fact that the targeted DU soil layer is covered by additional soil does not negate the need to collect a high-quality sample. The same applies to characterization of sediment that is covered by a layer of water.

Shallow subsurface soil (e.g., <25-50 cm) might be accessible using a sampling tube, slide hammer, or electric drills as described in Appendix F for surface soils. Hand tools such as shovels could also be used to access deeper soil. The collection of increments and samples below this depth or from hard-packed soils will generally require the use of a push rig able to collect continuous cores. A backhoe or similar equipment can also be used for trenching or pot holing to gain access to deeper soil.

Overviews of push rigs and other drilling equipment are provided in ASTM Standard D 6169 (ASTM, 2005) and ASTM Standard D 6286 (ASTM, 2006a,b,c). Direct push technologies can be used to collect samples to depths of up to 10 m below ground surface or more, depending on the compaction of the soil and the presence of rocks. Auger drilling can reach depths of 30 m or more. Rotary drilling can reach depths of 300 m or more.

Each of these technologies is discussed in more detail below. Direct-push methods are generally necessary for the collection of subsurface MI samples. Although included in the discussions below, auger and rotary drilling is more amenable to geotechnical investigations or the installation of monitoring wells. This is due to the difficulty in collecting continuous cores of a manageable size, as well as the expense, effort, and space required to operate the equipment. Drill cuttings and cores from such equipment might, however, be useful for initial screening of subsurface conditions and the need for a more intensive investigation (e.g., presence of absence of staining, approximate boundaries between contaminated fill and native soil, identification of contaminants of potential concern, etc.).

G.1 EXPLORATORY PITS, TRENCHES AND BORINGS

Exploratory pits, trenches and borings can be very use for initial investigation of subsurface contamination (Figure G-1). Look for changes in soil type, the presence of debris, staining, odors and other indications of possible contamination. Collect samples from suspect layers to identify contaminants of potential concern and identify potential clean boundaries. Consider use of a portable XRF, Photo Ionization Detector, immunoassay kits and other field screening tools to assist in the initial delineation of contaminated areas. While not normally reliable to complete a full risk-based investigation of site conditions, the observations made and data collected can be used to approximate the lateral and vertical extent of heavy contamination and designated DUs for a more thorough investigation.



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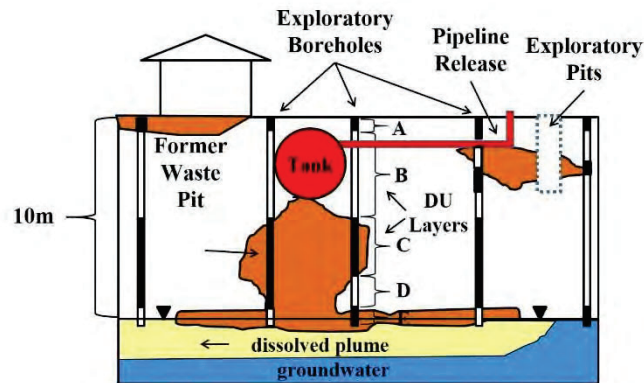


Figure G-1. Use of exploratory pits, trenches and borings for initial investigation of subsurface soil contamination and designation of DU layers for more detailed testing using Multi Increment sampling methods.

Continuous cores should be collected from boreholes using a direct-push rig whenever possible. Divide the core into targeted DU layers for testing. Submit the entire section of the core for a DU layer to the laboratory for processing and tested as a single sample if possible. “Discrete” samples from single points within the core should not be collected due to the unreliability of the resulting data to represent the targeted DU layer (see Appendix E).

The collection of a representative subsample from a core might be required if the total mass of the core interval exceeds the recommended 1 to 3 kg bulk sample mass. Methods for collecting representative subsamples from cores are discussed in Section G-3. Samples to be tested for VOCs should be placed in methanol in the field or otherwise preserved for extraction and testing at the laboratory (refer to Appendix I).

Be aware of the possibility for initial random pits, trenches or borings to miss widespread but discontinuous subsurface contamination. Document the limitations on data reliability for recommendations of additional action. Testing of subsurface soil can also be carried out following excavation by temporarily storing the soil in stockpiles (see Appendix H).

G.2 DIRECT-PUSH TECHNOLOGIES

Direct push technologies are a category of equipment that push or drive small-diameter hollow steel rods into the subsurface without rotating the drill rods (Figure G-2). Direct push drilling can yield high-quality continuous cores of soil from targeted depth intervals quickly and cost effectively in the right type of soil conditions and is ideal for MI sampling strategies. Push rigs can also be used to collect soil gas or groundwater samples. Smaller track-mounted rigs can be used for sampling areas with limited access. These rigs are also normally remote controlled and can be programmed to collect increments from a pre-established grid.



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Figure G-2. Direct push drill rigs.

Upper Left Photo: Truck-mounted push rig; solid drive cap and rod just prior to breaking into the subsurface. The hydraulic hammer, just above the drilling rod, moves up and down by a hydraulic piston, which can use the rig's weight to drive the drilling rods into the ground. Stabilizing legs on the vehicle are used for balance as needed.

Upper Right Photo: Smaller, track-mounted rig used to access tighter areas and/or extract cores from pre-programmed grid coordinates.

Lower Left and Right: Small push rig mounted to an All-Terrain Vehicle and used to collect surface soil samples; can be pre-programmed with increment collection points to operate remotely and without a driver.

A hydraulic hammer is used to progressively drive the steel rods into the soil, with the weight of the drill rig used to provide a constant force on the drill string (Figure G-3). Casing is advanced with a solid point held in place by an internal rod. A 4 cm- to 6 cm-diameter inner rod and core barrel is typically combined with an 8 cm- to 10 cm-diameter outer casing. As each section of the rod is advanced into the subsurface, another section of casing and rod can be attached to achieve greater depths. One- to two-meter drive rods and samplers are typically used, depending on the depth and thickness of the targeted DU layers. Multiple drives might be required to extract the full length of core needed.



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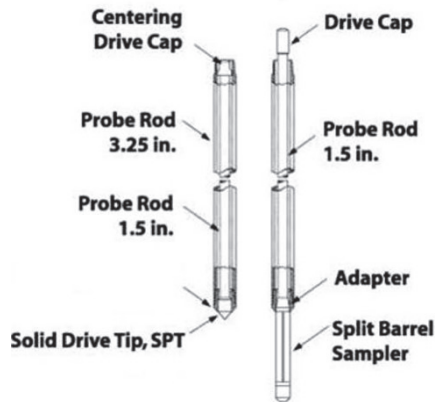


Figure G-3. Design of rods for a direct-push drill rig. Rod on left used to achieve specific sampling depth; solid drive cap penetrates subsurface. Rod on right is the split barrel sampler. Multiple samplers may be used to delineate the entire soil column.

The steel rods and driving tip are pulled from the subsurface when the top of the desired soil interval (i.e., top of DU layer) is reached, with the outer casing left in place. The solid point is removed from the end of the inner rod and a split-spoon or open-barrel sampler is attached.

A split-spoon sampler is a stainless steel, machined, hollow cylinder that can be opened lengthwise into two halves (Figure G-4). Split spoons can be used with hand-operated slide hammers, push rigs or larger drilling rigs. The cylinder is fitted with threaded ends. A cutting shoe is connected to the downhole end and a driving cap is connected to the uphole end. Split-spoon samplers can be lined with a clear Teflon or polyethylene



Figure G-4. Split spoon sampler.

Left Photo: Assembly shown with cutting shoe to left and end cap to the right and threaded to extension rod.

Right Photo: Split spoon sampler opened; note stainless steel liner above split spoon.

lining to help keep cores intact after the sampler is opened. Stainless steel or brass tubes are also sometimes used, although they are less amenable for the collection of MI samples

After the coring device is attached, the drill string is placed back into the casing and driven to the desired depth. A hydraulic hammer can be used in conjunction with the push rig for compact soils. The drive rod can



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be marked to help monitor depth. A drop hammer can be used to measure blow counts as part of a Standard Penetration Test if required as part of the investigation (ASTM, 2011). For example, a 65 kg hammer is dropped 75 cm and blows counted to advance each of three consecutive, 15 cm increments for a total of 45 cm. The resulting data are used to help evaluate structural properties of the soil, including consistency, *in-situ* strength, and susceptibility to liquefaction.

The drill string is retracted and brought back the surface after the base of the targeted interval has been reached under ideal circumstances. A continuous and relatively undisturbed core is ideally collected within the device. The sample barrel is opened and the core exposed (Figure G-5). The top of the plastic liner, if used, is cut away to allow access to the soil. Estimation of the boundaries between targeted DU layers might be required in cases where a complete core is not extracted, or where compaction during collection distorts the original thickness of the layers.



Figure G-5. Continuous Cores Collected using a Push Rig

Left Photo: Push rig cores with top of acetate liner removed to access soil

Right Photo: Oil-stained interval in left core targeted for screening and testing. Entire section submitted to laboratory for processing and subsampling as a single sample.

G.3 BOREHOLE CORE INCREMENT SUBSAMPLES

Each core section represents a single increment for a targeted DU layer in the same manner that a smaller core of soil collected from a shallow surface DU represents a single increment for that DU. Preliminary extraction and testing of cores from single, “exploratory” borings can be carried out to help designate subsurface DU layers for more detailed testing and identify contaminants of potential concern (refer to Section G-1 and Figure G-1). If done, the entire section of core for a targeted interval should be submitted to the laboratory for processing as a single sample or a representative subsample collected along the entire length of the core section. The collection and individual testing of single, “discrete” subsamples from specific points within a core will not provide reliably representative data and should be avoided (refer to Appendix E).

Targeted DU layers are identified and marked in the core (Figure G-6). The mass of an individual core increment collected with a push rig is typically too large for use in preparation of a bulk MI sample and field subsampling of the core increments is required. Each increment for an individual DU layer is subsampled, with



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the extracted soil placed in a container specific to that layer. The subsample should be collected in a manner that ensures it is representative of the entire, targeted DU layer. This can be accomplished by cutting a narrow wedge of soil from the entire length of the increment interval or by removing regularly spaced plugs of consistent mass from the increment (e.g., 5 to 10 grams; Figure G-7).



Figure G-6. Identification of targeted DU Layers in cores.

Left Photo: DU core increment placed on table for inspection and subsampling.

Right Photo: Targeted DU layer increments identified within core for subsampling and preparation of bulk Multi Increment samples.



Figure G-7. Subsampling of Core Increments for Preparation of a Bulk Multi Increment Sample.

Left Photo: Removal of a continuous wedge of fine-grained soil from a core increment.

Right Photo: Removal of regularly spaced, five-gram plugs of soil from a core increment using a plastic syringe-type sampler.

The MI sample should be collected in a manner such that a proportionally greater subsample mass of soil is collected from cores where the DU layer is thicker in comparison to cores where it is thinner. This will allow the final sample to be representative of the DU layer within the targeted area as a whole. Preparation of a representative sample is accomplished by collecting subsamples in a consistent manner from all cores. For example, the collection of a 5g subsample every 5 cm in all cores will result in a final sample mass representative of the total length of the DU layer in the cores as a whole.

Under ideal circumstances the wedge method is preferred since the resulting subsample provides 100% vertical coverage of the core increment. Removal of a continuous wedge from a core might not be possible if rocks are present or loss of volatiles might be an issue, however, and subsampling of core increments using



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the plug approach is most common.

Increment subsamples are combined in the field to prepare a single sample for the DU layer in the same manner as carried out for surface soil sample. Note that the individual soil plugs are subsamples of a single core increment and do not represent individual increments themselves. Individual subsample plugs cannot be counted towards the total number of increments collected from a subsurface DU layer since they were not collected from independent, random locations. The minimum recommended number of increments for testing of a DU (e.g., 30 to 75; see Section 3.6.2) does not apply to subsampling of core increments using subsample plugs. The precision of the subsampling method is instead tested by the collection of replicate (triplicate) sets of subsamples from the same core in 10% of the DUs, as described below.

The mass of soil included in a single core wedge or as the sum of plugs removed from a single core increment is dependent on target sample mass for final DU layer in the same manner as done for a surface sample. For example, if a 1.5 kg bulk sample is desired and 30 core increments are to be collected to represent a DU layer, then the subsample mass for each core increment should total approximately 50 grams. Careful consideration of the soil subsample mass collected from each core increment prior to subsampling is critical to ensure that mass of the resulting bulk sample will be adequate to meet target requirements (e.g., 1 to 3 kg) but not so large that additional subsampling in the field or laboratory will be required.

If a core wedge cannot be collected, then the target subsample mass should be collected from what is anticipated to be a representative number of points within the core increment layer. For example, if the collection of an approximately 1 kg bulk MI sample from a 25 cm thick DU layer is targeted, and thirty increment cores are to be collected in the DU, then six, 5-gram plugs at a spacing of two inches could be extracted from each of the 30, 25 cm-foot thick core increments for a total bulk MI sample mass of approximately 900 grams for the DU layer. The mass of soil removed from each individual core increment should be kept constant, assuming a constant DU layer thickness. Maintain consistent wedge width or plug spacing for subsampling of core increments collected from DU layers with varying thicknesses between borings.

The collection of replicate samples to evaluate the precision of both increment subsampling and the overall sampling approach is recommended (see Appendix L). At a minimum, replicate sets of increment subsamples (e.g., triplicates) should be collected from one or more of the targeted DU layers and combined into independent samples for testing. For example, replicate sets of subsamples can be collected from different sites of the same core and reserved for combination into single, independent samples. If the resulting data are reasonably consistent (e.g., RSD <35%) then the precision of the subsampling methods used can be considered to be good (see Appendix L). This allows both the precision of the subsampling method as well as the precision of the overall sampling method to be evaluated. Independent sets of borings are used to collect replicate samples in select DUs to test the precision of the overall approach, in the same manner as done for surface samples.



G.4 PIT OR TRENCH SAMPLE COLLECTION

The use of pits or trenches to collect samples might be required in situations where considerable debris, rubble, or rock create obstructions in the subsurface. Pits and trenches can also provide useful information on the nature of subsurface soils within a DU prior to a more detailed investigation.

Pits can also be used to collect sample increments from shallow subsurface DU layers in cases where a push rig is not available or at sites where heavy equipment is already available and more cost- or time-beneficial to use (Figure G-8). Denote the tops and bottoms of targeted DU layers using a measuring tape or stick. Collect a continuous increment from the entire thickness of the exposed layer by scraping soil from the sidewall of the pit. Ensure that an appropriate mass of soil is included in each increment to meet the targeted bulk sample mass.



Figure G-8. Use of shallow pits to collect increments from multiple subsurface, DU layers.

Left Photo: Backhoe used to dig increment collection pits with large DUs at a former golf course. Thirty pits were dug to a depth of one meter in each half-hectare, DU area. A GPS unit was used to identify increment collection points.

Right Photo: Vertical soil horizons and DU layers targeted for collection of increments and assessment of arsenic concentrations with depth (e.g., 0 to 25 cm, 25 to 50 cm and 50 to 100 cm). An increment was collected across the entire targeted DU layer depth, and all increments from that same depth in multiple pits/trenches were combined to prepare a bulk Multi Increment sample for that layer.



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Trenches can be strategically placed within a DU to investigate the presence of buried debris and evaluate the soil stratigraphy as well as collect MI samples (Figure G-9). In the example, targeted DU layers were excavated in successive lifts and placed on plastic for field screening with a portable XRF. Initial soil removal was carried out based on a subsequent map of the extent and depth of contaminated fill material. The floor and sidewalls of the excavated area were then subdivided into DUs for the collection of confirmation samples.



Figure G-9. Use of trenches for site investigation to identify the presence and approximate thickness of known, lead-contaminated fill at strategic locations across a site.



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In Figure G-10, a trench approximately one-meter wide was excavated to a depth of one meter to look for buried debris, staining and other signs of contamination and access targeted DU layers for initial sample collection and identification of COPCs. A 50-increment sample was collected from the exposed face of each of two targeted DU layers. Increments were collected in a systematic, random fashion across the entire extent of the DU layer (black bar in upper DU layer depicted in Figure G-10).



Figure G-10. Use of shallow trenches to collect samples from exposed DU Layers. Surface DU boundaries noted in blue. Surface sample (0-15 cm) collected prior to excavation of trenches. Increments for subsurface DU layers collected across the full vertical thickness of the exposed targeted horizon to prepare a bulk sample (layers depicted).

Field replicates can be collected within the same trench to assess the overall precision of the sample collection method. Independent sets of trenches within select DUs could be used to collect replicate samples in the same manner as done for surface samples and further assess the precision of the data.

Safety precautions are imperative to protect workers collecting samples during trenching. Excavations over 1.5m in depth typically need to be shored or properly sloped to prevent collapse during sample collection. A backhoe can be used to collect increments from the sidewalls of deep or otherwise unstable excavations.



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G.5 HOLLOW STEM AUGERS

Hollow-stem augers were already in use for drilling and coring in unconsolidated soils for geotechnical work at the advent of environmental investigations in the 1980s (Figure G-11 and G-12). The use of auger rigs is described in ASTM Standard D 5782 (ASTM, 2006a; see also USACE, 2001; Nielsen, 2006). The rigs are capable of reaching depths of 30 m in unconsolidated to semi-consolidated soil and even gravel, but cannot normally penetrate bouldery formations or lithified rock.



Figure G-11. Hollow-stem auger drill rig.

Left Photo: Large rig for deep boreholes; requires a high overhead clearance for the mast. The auger flights (right in photo, on ground) are rotated and pressure is applied from the drill rig to advance the drill string downwards.

Right Photo: Smaller track-mounted auger rig used for shallower borings or drilling in limited clearance areas.



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Figure G-12. Auger drill bit and drill string.

Left Photo: Bit attached to bottom of auger to move soil to the side as the rotating auger advances.

Right Photo: The auger flights bring soil cuttings from the drill bit upwards to the surface. The asphalt was cut prior to drilling. Flights are added as needed as the auger advances. Plastic sheeting on the ground keeps potentially contaminated soil and water brought up by the auger from mixing with surface soils or impacting the pavement.

The use of auger rigs to collect soil samples has largely been replaced by more compact and efficient push rigs described above, although they are still frequently used for the installation of large-diameter monitoring wells. Hollow stem augers are not recommended for the collection of MI soil samples due to the large volume of soil removed at individual boreholes. The collection of samples from cuttings brought to the surface by the auger can be a useful part of exploratory boreholes, although it can be difficult to know the exact depth that the soil originated from. Layers of heavy contamination can also become mixed within the cuttings and obscured from observation.

G.6 ROTARY DRILLS

A detailed discussion of air or mud rotary drilling is beyond the scope of this technical guidance. Rotary drilling is generally used for geotechnical studies or the installation of wells through bedrock rather than for collection of soil samples (Nielsen, 2006; US Navy, 2015). These rigs are less useful for the collection of subsurface soil samples to be tested for contaminants. Aside from the expense and space required to operate the rigs, complete recovery of cores during drilling is difficult when drilling in unconsolidated and semi-consolidated lithologies, such as clays, silts, and sands. The rigs are most useful for the collection of continuous rock cores for geologic or geotechnical studies. Standard rock coring methods are summarized in ASTM guide D 2113 (ASTM, 2008). Standard rotary drilling methods are summarized in ASTM guide D 5782 (ASTM, 2006b).



APPENDIX H. COLLECTION OF EXCAVATION AND STOCKPILE SAMPLES



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H.1 EXCAVATIONS

Multi Increment (MI) samples are collected from the walls and floor of an excavation in the same manner as done for exposed, surface soils (Figure H-1). Each Decision Unit (DU) represents a thin layer of soil in the walls and beneath the floor. As a default, assume a 10 to 15 cm DU thickness for sample collection. Collect replicate samples from the floor or sidewall DU at highest risk of residual contamination (see Appendix L). The number of increments collected to prepare a sample should be pertinent to the type of contamination present (e.g., 30

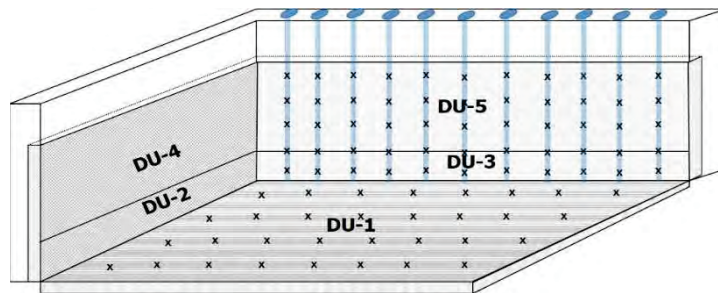


Figure H-1. Example increment collection locations from excavation floor and sidewall DUs.

to 75+; refer to Section 3.6.2). Ensure a minimum sample mass of 1 to 3 kg for samples to be tested for non-volatile chemicals. Sample collection methods for volatile chemicals are discussed in Appendix I.

A push rig can be used to collect confirmation samples prior to excavation, as depicted for the rear wall of the excavation in the figure. This can negate the need for follow-up testing and expedite project completion if screening levels are met and the samples meet minimum increment spacing and bulk sample mass requirements. Increments should be collected in an evenly spaced, systematic random manner both within cores and between adjacent cores (refer to Section 3.6.2). This might require the installation of very closely spaced borings for a sidewall DU that is significantly longer than it is tall (sidewalls) or wide (floors), since a minimum of 30 borings would be required. Refer to Appendix F for additional guidance on the collection of samples from long, narrow DUs. Follow-up collection of confirmation samples from exposed sidewalls after excavation is required if the collection of high-quality samples prior to removal of soil is not possible.

H.2 STOCKPILES

It is important to ensure that soil from different sources or with suspected different magnitudes of contamination is kept segregated. This will help minimize accidental mixing of contaminated soil with clean soil and expedite testing of the soil and determination of options for reuse or disposal. Similar approaches can be used to segregate and characterize mine tailings, dredged sediment, biosolids and other types of particulate media. Additional guidance on testing of stockpiles or other sources of material to be used as fill material is provided in Appendix P.

The general approach to characterization of stockpiled soil include:

1. Segregate stockpiles with respect to different source areas;



2. Further segregate the soil into anticipated clean and anticipated contamination stockpiles;
3. Select appropriate DU volume(s) based on proposed reuse of soil land use and contaminants of concern;
4. Choose a sampling strategy and tools that will provide access to sampling points throughout each DU;
5. Collect triplicate MI samples in 10 percent of DUs (minimum one set; see Appendix L);
6. Consider the specific timing of the sampling activities – sampling during stockpile formation is ideal but might not be practical from a safety standpoint.

Table I-1 summarizes the DU volume recommended for characterization of fill material in stockpiles. Decision units for stockpiles should generally be designated in terms of volume, rather than area. The appropriate DU volume for a stockpile is based on several factors, including:

- Targeted contaminants and associated environmental hazards;
- Proposed use of fill material at receiving site (e.g., residential versus commercial or industrial property, etc.); and
- Assumed reuse of soil and potential exposure areas and soil placement thickness;
- Total volume of fill material to be characterized.

Allowances for larger DU volumes can be made for deeper material not known or suspected to be contaminated (e.g., native soil) as well as sediment to be dredged from areas that lack known sources of potentially significant contamination, where testing is primarily for due diligence purposes. Final DU volume limitations should be discussed on a case-by-case basis with the overseeing regulatory agency.

Highly volatile or leachable chemicals can pose significant vapor intrusion or leaching hazards that could require a more detailed characterization of the proposed fill material. Small DU volumes are recommended for testing of soil suspected to be contaminated with these types of chemicals. The recommended volume to a single DU for reuse at residential sites, schools, parks and commercial or industrial facilities is based in part on the assumed thickness of the material to be placed in an area and the size of exposure areas typically assessed as part of a risk assessment (refer to Section 3.3.4 and Appendix C). Volume is calculated by multiplying the size of the assumed exposure area by the assumed thickness of the fill material to be placed at a site.

While somewhat subjective, the recommended range of default stockpile DU volumes serves as a useful starting point for discussions and can be made more case specific as needed. Be aware that placement of thick units of fill material at a site and corresponding characterization of very large volumes of material as a single DU could place an inherent restriction on future reuse of the soil at other sites in the absence of additional testing.

It is important to allow equal access to all soil within a stockpile DU for the collection of increments. Increments collected from only the exposed surface of a stockpile, for example, might not be representative of deeper soil. When space is available, the stockpile should be flattened to a thickness of one meter or less to allow equal access to all soil in the pile (Figure H-2). Increments are then collected from the top, middle, and bottom of the pile in a systematic random fashion.



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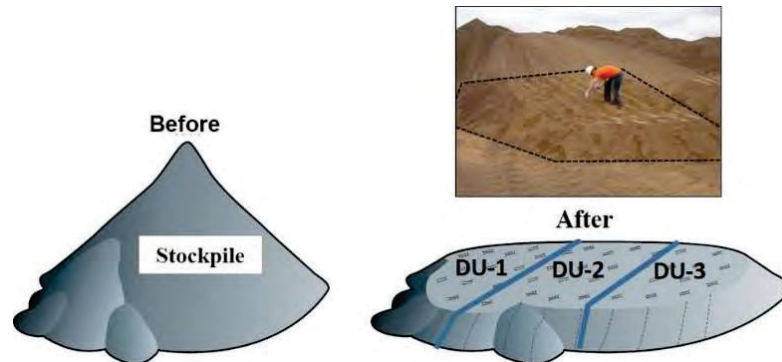


Figure H-2. Collection of increments and Multi Increment samples from a flattened stockpile. Increments are collected alternately from top, middle, and bottom of flattened DU to collect a representative sample.

Another option is to collect increments as the stockpile is being formed (Figure H-3). For example, increments could be collected from front-end loader buckets at appropriate intervals of soil volumes as the soil is being excavated or moved. Increments could also be collected as piles are formed at the end of a conveyor belt, or when stockpiles are being moved from one location to another. This allows equal access to each portion of the pile as it is constructed, avoids the need to reconstruct a stockpile, and saves space required to flatten a stockpile for sampling. The collection of soil samples during these activities can interfere with the operation of heavy equipment, pose a risk to the sample collector and requires careful coordination between all parties.



Figure H-3. Examples of opportunities to collect increments and Multi Increment samples during stockpile formation or movement of soil.

A third option for stockpiles that cannot be spread out is to progressively characterize accessible soil from one or more faces of the pile as the soil is needed (Figure H-4). Collected increments in a systematic, random fashion from the targeted volume of soil in a manner that meets minimum increment spacing and bulk sample mass requirements. Ensure that the targeted volume of soil does not exceed recommended limits noted in Table H-1 or as otherwise approved by the overseeing regulatory authority. Soil represented by the resulting sample can be cleared for reuse or disposed as appropriate. Replicate samples could be collected from every



tenth DU volume of soil tested to verify the adequacy of the overall sampling method (see Appendix L).

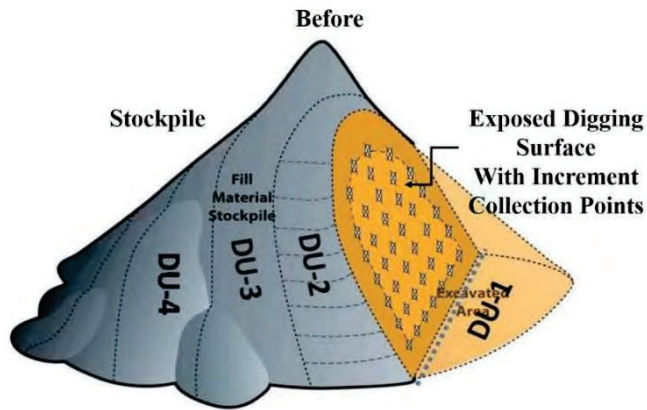


Figure H-4. Progressive testing of DUs from an unflattened stockpile. Increments collected from the surface and shallow depths within the exposed face to prepare the bulk Multi Increment sample.

In some cases, testing of very large existing stockpiles using one of the above-noted methods might not be possible due to the lack of space and a need to test the soil for immediate removal from the site. In such cases, divide the stockpile into DUs based on the recommended volume limits noted in Table H-1 or as otherwise approved and mark the boundaries of DUs on the surface of the stockpiles. Collect a sample from the exposed surfaces of the designated DUs in accordance with standard MI sampling procedures for surface samples (refer to Appendix F). Use a backhoe or other equipment to dig pits into deeper parts of as many DUs as possible. Inspect the soil for changes in soil type, color, debris, staining, odors and other indications of potential contamination. Collect at least one sample from the entire exposed area of the excavation. Compare this data to data for the surface sample from the same DU. Consider limitations in the data due to the inability to access all parts of the pile and the known or suspected source of the soil when determining appropriate reuse or disposal.



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Table H-1. Example default stockpile DU volumes based on targeted contaminants of concern and receiving site land use.

Targeted Contaminants of Concern	Receiving Site Land Use Category	¹ Assumed Fill Reuse Area and Thickness	^{2,3} Default Stockpile Decision Unit Volume	Example COPCs	Primary Potential Environmental Hazards
⁴ Volatile Compounds	Any	Area: 100-200 m ² Thickness: 0.5 m	50-100 m ³	TPHg, TPHd, BTEX, naphthalene, PCE, TCE, mercury	Vapor intrusion, leaching
^{4,5} Highly Leachable, Non-Volatile Contaminants	Any	Area: 100-500 m ² Thickness: 0.5 m	50-250 m ³	chlorinated herbicides, perchlorate, PFASs, explosives	Leaching and surface runoff or groundwater contamination
^{5,6,7} Low Mobility Contaminants	Unrestricted Use	Area: 400-1,000 m ² Thickness: 0.25 m	100-250 m ³	heavy metals, dioxins/furans, PCBs, PAHs, TPHo, organochlorine pesticides	Direct exposure
	Schools and High-Density Residential Developments	Area: 1,000-2,000 m ² Thickness: 0.25 m	250-500 m ³		
	⁸ Parks and athletic fields (contamination)	Area: 2,000-4,000 m ² Thickness: 0.25 m	500-1,000 m ³		
	^{9,11} Commercial/Industrial use only (localized fill source from previously developed area; assumed low-moderate risk of contamination)	Area: 2,000-4,000 m ² Thickness: 0.25 m	500-1,000 m ³		
	^{10,11} Commercial or Industrial use only (large, agricultural field, undeveloped land or dredged sediment fill source assumed low risk of contamination)	Area: 4,000-10,000 m ² Thickness: 0.25 m	1,000-2,500 m ³		



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Table H-1 (cont.). Example default stockpile DU volumes based on targeted contaminants of concern and receiving site land use.

Notes:

COPCs	Contaminants of Potential Concern
BTEX	Benzene, Toluene, Ethylbenzene, and Xylenes (total)
PAHs	Polycyclic Aromatic Hydrocarbons
PCBs	Polychlorinated Biphenyls
PCE	Perchloroethylene
PFASs	Perfluoroalkyl substances
TCE	Trichloroethylene
TPHg	Total Petroleum Hydrocarbons as gasoline
TPHd	Total Petroleum Hydrocarbons as diesel
TPHo	Total Petroleum Hydrocarbons as heavy oil
m ² , m ³	square/cubic meters

1. Assumed placement area and thickness of fill material; used to derive target DU volumes for individual testing.
2. Isolate known or suspected, heavily contaminated volumes of soil for treatment or disposal to the extent practicable. Larger volumes might be acceptable on a case-by-case basis. DU volumes up to 400 m³ acceptable for unrestricted reuse on case-by-case basis if prior knowledge and a thorough Phase I indicates low potential for contamination. Using DU sizes larger than accepted for unrestricted fill material reuse might require retesting of property where fill material is placed if property is proposed for more sensitive land use in the future (e.g., residential). Allowances for larger DU volumes can be made for deeper, native soil or dredged sediment from areas that lack known sources of potentially significant contamination, where testing is primarily for due diligence purposes. Consideration of a “fluff factor” and larger volumes can be made for stockpiled ex situ soil that will be compacted during use as fill material.
3. Collect triplicate MI samples in 10% of DUs (minimum one set).
4. Minimum 0.5 m thickness of fill material assumed necessary to contain sufficient contaminant mass to pose long-term vapor intrusion or leaching risks. Review on a site-specific basis as needed. Appropriate DU volume for highly volatile or highly leachable chemicals is site-specific and depends in part on the mass of the contaminant present. Collect soil vapor data to assess vapor intrusion risks for existing or future buildings.
5. Assumed area reflects default range of direct-contact, exposure areas utilized in risk assessments. Minimum 0.25 m thickness of fill material assumed placed at reuse sites and used to calculate range of default DU volumes.
6. Include laboratory batch leaching tests and/or soil column leaching tests to risk posed by leaching of metals if contamination above unrestricted, direct-exposure screening levels is to be left in place and reliable, leaching based screening levels or if screening levels are not available (HIDOH 2017b).
7. Using soil with known pockets of low volatility and relatively immobile heavy oil as fill material not recommended due to gross contamination concerns (odors, staining, sheens in runoff, etc.) and public perception concerns.
8. Residential/Unrestricted Land Use screening levels and target risks apply.
9. Assumed localized fill source from previously developed area with low to moderate risk of contamination.
10. Assumes large fill source from agricultural land, undeveloped land or sediment dredged from areas with no known past or current source of pollutants and minimal risk of contamination. Thorough Phase I review of historical site use required and used to support larger DU volumes and, if adequate, could negate need for testing other than for due diligence purposes. Minimum testing of 2,500 m³ volumes of material recommended (assumes used as fill material for one-hectare area with a thickness of 25 cm).
11. Commercial/Industrial screening levels and target risks apply.



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APPENDIX I. Sample Collection for Volatile Contaminants

I.1 OVERVIEW

Refer to Table I-1 for a list of example chemicals considered to be volatile. Tables I-2 and I-3 list example chemicals considered to be semi-volatile or otherwise chemically unstable. A discussion of laboratory processing of samples to be tested for the latter is provided in Appendix K, Section K-6.

Samples to be tested for volatile organic compounds (VOCs) are most commonly collected from cores extracted from targeted subsurface Decision Unit (DU) layers, sidewalls and floors of excavations or stockpiles of soil suspected to be contaminated with fuels or solvents. Testing of soil and sediment for semi-volatile or otherwise unstable compounds is discussed under laboratory processing in Appendix K (refer to Section K-6). Testing of samples from freshly exposed faces of excavations for VOCs might be required to confirm removal of contaminated soil. Testing of exposed shallow surface soil (e.g., 1 to 15 cm) for VOCs is usually not warranted due to the anticipated loss of volatile compounds to ambient air. Exceptions include characterization of recent spills or historical heavy contamination of surface soil. Soil vapor samples should be collected at sites where there is a potential risk of vapor intrusion into existing or anticipated future buildings (HIDOH 2021).

The collection of soil samples to be tested for VOCs is similar to that described for non-volatile contaminants, except that increments or subsamples of increments from cores are placed in methanol or an alternative extraction solution in the field. Alternative methods for combining and/or preserving increments are discussed later in this section. The collection of samples to be tested using this method should be discussed with the laboratory well in advance of field work. The analytical laboratory should be consulted prior to sample collection to discuss sample containers, sample handling, preservative type and volume, shipping of samples in methanol, anticipated laboratory method detection limits, etc.

Laboratory Method 5035 provides options for preservation of samples based on desired detection limits and desired holding time limitations (USEPA 2002a; refer also to MADEP 2002, TRNCC 2002 and CAEPA 2004). The best option in terms of data representativeness is to combine increments in a container with methanol. The amount of methanol placed in the container is calibrated to the mass of soil increments anticipated to be collected for a specific sample. Tools that extract core-shaped plugs of soil are utilized in the field to ensure a consistent mass of individual increments and to approximate the total mass of material collected. Coring devices with calibrated sample collection volumes are generally utilized so reasonable estimates of total mass can be made. The total mass of soil placed in the solution should closely match the mass initially relayed to the laboratory to ensure the soil remains covered by methanol during sample storage and shipment. The laboratory estimates the original concentration of the targeted VOC in soil by dividing the mass of the VOC estimated to be in the methanol by mass of soil placed in the container.

The use of methanol under Method 5035 allows for a holding time of 14 days prior to analysis by the laboratory. Ideally, samples should reach the laboratory within 48 hours of collection to verify that methanol is not being lost from the container. Methanol loss would introduce error into the calculation of the original concentration of the VOC in the soil sample. Potential problems with the use of methanol include an increase in method detection levels due to the need to dilute the solution for analysis and logistical issues related to



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obtaining, storing and shipping the flammable solution. These issues should be resolved with the laboratory prior to the collection of samples in the field.

Although allowed as an option under Method 5035, the use of reagent-grade water rather than methanol as an extraction solution is not recommended. This approach was included in the lab method to allow for lower detection limits in comparison to samples extracted into methanol (USEPA, 2002a). Improvements in laboratory methods since that time should provide methanol-based reporting limits of 50 µg/kg for volatile chemicals, which is more than adequate for screening purposes.

Water-based extraction is also significantly less effective in comparison to methanol according to laboratories contacted by the overseeing regulatory agency. While the precision of the data in terms of the analytical method might be higher than for methanol, this is likely to be outweighed by error associated with incomplete extraction of VOCs from the soil as well potential degradation as during storage and shipment. In addition, VOCs will be less tightly held in water than in methanol and can be lost when the sample bottle is opened repeatedly to add increments. A further disadvantage is that samples must either be analyzed within 48 hours or frozen to -7°C within 48 hours and then analyzed within seven days from the sample collection date. This limited holding time can pose additional problems for samples that must be shipped for analysis.

The use of an acidic sodium bisulfate solution as an alternative to water is also provided under Method 5035. It provides both an extended holding time (up to 14 days) and allows for very low detection levels. Reaction with organic matter, effervescence and loss of VOCs in calcareous soils, and other potential problems interfere with the practical use of this approach in the field. Use of a sodium bisulfate solution is not recommended unless a site-specific field study is carried out to demonstrate the data are comparable to using a methanol-based solution.

Note that soil data for volatile compounds are most efficiently used to estimate the mass of the contaminant present within a DU as a tool to assist in the design of remedial efforts. The primary environmental risks associated with volatile chemicals are vapor intrusion into overlying buildings and/or leaching of the contaminant into underlying groundwater. In both cases, the collection of soil gas sample data can serve as more directly applicable alternative to soil sample data, provided that soil gas-based action/screening levels are available or can be developed for comparison (refer to Section 13 of the TGM; see also HDOH 2017).

I.2 INCREMENT COLLECTION AND SAMPLE PREPARATION

A volume of methanol, adequate to accommodate the estimated total mass of increments to be collected for a sample, is placed in the sample bottle prior to collection of the sample. A minimum 1:1 ratio of solution volume to soil mass is recommended (i.e., 1 ml of methanol to 1 gram of soil). This generally allows for slightly more methanol to be in the container by volume than soil and ensures that the soil remains saturated and covered with methanol during storage and shipment.

The laboratory will typically provide sample jars with pre-measured amounts of the solution based on direction from the sampler and regarding the approximate mass of soil to be added. The addition of methanol in the field might be required to ensure the sample mass is completely submerged. The specific volume of methanol added should be documented and discussed with the laboratory that will receive and analyze the samples, since calculation of the original concentration of the VOC relies on accurate knowledge of the volume



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of methanol placed in the sample container. Increasing the volume of methanol in the container will lower the reporting limits for VOCs but is necessary to ensure data representativeness.

To select the appropriately sized sample container, consideration should be given to the total volume of soil to be collected and the volume of preservative required. A minimum 300 gram mass of soil should be collected to prepare a bulk Multi Increment (MI) sample. For example, 60 increments of 5 grams each for a total of 300 grams of soil (minimal recommended sample mass) would require approximately 300 ml of preservative. Utilize a container that is large enough to accommodate additional preservative (if needed) and to prevent loss of preservative through splashing as soil increments are dropped into the container. This can normally be accomplished using one-liter, amber glass bottles pre-filled at the laboratory with 300 ml of methanol.

Shipping constraints might require placement of increments in multiple small vials for combination at the laboratory. Methanol-preserved samples should be stored in a cool location away from direct sunlight until they can be placed in a cooler or refrigerator. Methanol should never be stored in a refrigerator. It is a clear, odorless, flammable liquid and could produce an explosion in a refrigerator. Only store methanol in coolers with ice or gel ice.

It is very important to remember that samples to be tested for VOCs be placed in methanol immediately after collection to prevent potential loss due to volatilization and/or biodegradation. Good planning of the field sampling effort is essential to ensure that reliable VOC sample data are collected appropriately.

I.3 SUBSURFACE DU LAYERS

Each section of core extracted from a targeted DU layer represents an increment for that layer in the same manner that a small core extracted from a surface DU layer represents a single increment for that layer (see Appendix G). These are referred to as “core increments.” Individual core increments extracted from borings can be too large for combination into a manageable sample, however, and will normally need to be subsampled in the field to prepare a final, bulk sample.

Identify targeted DU layers in a core increment immediately after the core is received for sample collection. Evenly spaced plugs of soil should be removed from the core increment and placed in a container specifically designated for that DU layer (Figure I-1). The container should be pre-filled with a volume of methanol appropriate for the anticipated final mass of soil to be collected, normally a one-to-one ratio of methanol volume to soil mass (see Section I.2). The use of plugs rather than wedges helps control the total mass of soil collected and minimize disturbance of the soil during collection. Subsamples from core increments from other borings installed into the same DU layer are progressively added to the container specific to that layer as the field investigation advances to prepare a final sample.



Figure I-1. Subsampling DU Layer increments from borehole cores with methanol preservation.

Upper Left Photo: DU layers identified in core (depicted by arrows).

Upper Right Photo: Core increment subsampled by collection of 5-gram plugs at regular spacing to collect targeted increment subsample mass (inexpensive TerraCore™ sampler shown). Subsample plugs placed in jar with pre-measured volume of methanol intended to provide a 1:1 ratio of methanol to soil.

Lower Left Photo: Total weight of subsample plugs collected from core increment monitored using a portable scale to ensure consistency between boreholes, and that the target sample mass is met.

Lower Right Photo: Use of sealable 5 to 10 g coring devices for collection and storage of individual increment subsamples when field use of methanol is not practical (Core N' One™ device shown). Increments (or increment subsamples) are immediately frozen and shipped to laboratory for combination and extraction into methanol and testing.

It is very important that sample increments be placed in methanol as soon as possible (i.e. within a minute or two) to prevent potential loss of volatiles due to volatilization and/or biodegradation. Good planning of the field sampling effort is essential to help ensure VOC samples are collected appropriately.

The total mass of increment subsamples should be adequate to prepare a minimum, 300-gram sample. A smaller mass of soil is generally acceptable for the collection of a sample to be tested for VOCs due the assumed absence of high concentration “nuggets” of contaminated soil and a greater degree of compositional heterogeneity associated with non-liquid and non-volatile contaminants (see Appendix D). If the thickness of the DU layer is anticipated to be consistent across the DU area, then divide the target mass of the final sample by the number of core increments to be collected to determine that total subsample mass that should be collected from a single increment. For example, collection of a 300-gram sample from 30 boreholes would require that ten grams of soil e.g., two five-gram plugs) be collected from each core increment.



Space the subsample plugs in a manner that covers the total thickness of the core increment as efficiently as possible. Note that the collection of smaller subsample plugs allows for more efficient coverage of an individual increment, since the collection of more plugs is required to meet the target sample mass.

Collection of a targeted mass of soil from a DU layer that varies in thickness requires more advanced planning. The same sample mass will be collected, but the mass of subsamples collected from individual increments will necessarily vary to bias the mass of the final sample toward the thicker areas of the layer. Approximate the average thickness of the layer based on data from exploratory boreholes (see Appendix G). Multiply this thickness by the number of core increments to be collected. This represents the total length of the combined core increments. Divide the target final sample mass by the mass of a single subsample plug. For example, preparation of a 300-gram sample based on combination of 5-gram subsample plugs requires the collection of 60 plugs.

Divide the total length of the combined core increments by the number of subsample plugs to be collected. The result reflects the target spacing of plugs to be extracted from any individual core increment. Maintain consistent plug spacing for subsampling of all core increments collected from the DU layer. This will help ensure that the final sample is properly weighted toward thinner and thicker areas of the layer, since more plugs will necessarily be collected in thicker areas.

When sampling VOCs in soils it is important to ensure that soil is placed in the preservation fluid (methanol) within a few minutes after collection to reduce losses due to volatilization and biodegradation. This can be especially challenging when collecting samples or subsamples from multiple subsurface borings and multiple DU layers per boring. Very close coordination is necessary between the drill crew and the sampling crew to minimize the time between extraction of the core and placement of increment subsamples in methanol.

Set up a well-organized workstation for processing the subsamples (see Figure I-1). All sample containers should be pre-labeled to save processing time. Adequate storage containers/coolers with ice should be readily available as samples are prepared. If a nearby indoor workstation is not available for use, then a field workstation with tarps or covers for rain, sun, and/or wind protection might be needed. A minimum of two people is normally required to efficiently prepare samples and minimize delays on the collection of cores by the drill team. One person should be assigned to each targeted DU layer to avoid inadvertent mixing of subsamples between cores.

Increments should be collected using tools that minimize the loss of volatile chemicals during sample collection (e.g., cause the least disaggregation of soil) and allow the collection of at least a five-gram plug of soil. Syringe-type, core-shaped devices that can be pushed directly into the soil are preferable. Examples include the TerraCore™, Core N' One™ and Encore™ tools (see Figure I-1). Inexpensive, plastic, disposable syringes with the forward ends cut off are convenient for subsample collection when methanol can be used in the field. These types of devices can also be used for the collection of subsamples from core increments

As depicted in Figure I-1, the device is pushed into the soil, retracted, and the increment collected is immediately extruded into a container with a premeasured volume of preservative (e.g., methanol). Then end of device can be trimmed to make a scoop for subsampling of gravelly soils. This is repeated with each increment or increment subsample. Dedicated sampling devices should be used between different DU layers



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within a single borehole but can be reused for subsampling of core increments in multiple DU boreholes for the same DU layer.

A single large jar with a pre-measured volume of methanol adequate for the entire targeted DU layer could in theory be used to prepare a bulk MI sample in the field (i.e., plugs from subsample increments combined from 30+ borings). However, this risks an expensive total loss of the sample should the jar be accidentally broken in the field or at the laboratory.

An alternative approach is to place subsample plugs for individual core increments into a smaller jar specific to each borehole. Methanol from individual jars (aliquots) representing the same targeted DU layer can then be combined at the laboratory for testing. This approach can also allow for different vertical and lateral combinations of core increments to be evaluated to obtain a better resolution of the location of the core mass of contamination at depth and help optimize remediation.

Subsample replicates should be collected from 10% of the borings and compared to evaluate the precision of method used. This will involve the collection and combination of three separate sets of subsample plugs from the same boring for each of the targeted DU layers. The relative standard deviation of the replicate data sets should be compared and the subsampling method modified, as needed, to achieve an acceptable precision. Increasing precision could require a decrease in plug spacing and the collection of more plugs per DU layer interval and/or an increase in the mass of subsamples collected from individual increments.

I.4 SAMPLE SHIPMENT

Methanol is a hazardous material with flammability and toxicity concerns. Check with local regulations and the carrier to be used for shipping requirements. The maximum-allowed, "Excepted" quantity for air shipping of methanol in many countries is no more than 30 milliliters per inner container and a maximum of 0.5 liter per cooler or package. There is no limitation on the number of separate coolers or packages that can be shipped as long as each individual cooler meets the methanol quantity limits. Confer with airline used and applicable International Air Transport Association regulations. Ensure that the package(s) are properly labeled and the shippers have knowledge regarding the samples and sampling methods used. Check with the shipper beforehand to ensure that containers are properly labeled and shipping requirements met. Restrictions could vary between islands and airlines. For shipping methanol above the excepted quantities, a hazmat-trained shipper or packer should be utilized, or someone with equivalent training/certification and knowledge of applicable regulations.

I.5 ALTERNATIVES TO METHANOL PRESERVATION

Collection of Methanol Subsamples

Alternatives can be considered in consultation with the laboratory in cases where volumes of methanol greater than 30 milliliters per container presents problems for air shipping. For example, place MI sample increments into the full, recommended volume of methanol in the field. Record the exact volume of methanol and total mass of soil placed in the container and provide this information to the laboratory. Agitate the sample and allow the solution to equilibrate over a twenty-four-hour contact period. Decant at least 20 ml of the solution into a standard 40 ml VOA vile using a gas-tight syringe (check with laboratory on required



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volume).

This alternative should only be conducted under a specific procedure provided by the laboratory and is included in the site investigation report. Ship the samples to the laboratory under the "Excepted" quantity category for methanol (in accordance with airline used, and applicable IATA regulations). Method 5035A also notes that sonification of samples at 40°C for 30 minutes can be carried out for samples with less than 24 hours contact. If this option is available, then it can be used to shorten methanol contact time required before subsampling and shipping samples by air.

Note that the remaining spent methanol mixture is classifiable as a listed hazardous waste under some regulations and must be managed accordingly (e.g., classification as F003 waste for spent, non-halogenated solvents under Section 261, Title 40 of the USEPA Code of Federal Regulations). The spent mixture might also be classifiable as a hazardous waste due to ignitability. However, quantities of waste methanol generated will likely be minimal, in which case regulations for conditionally exempt small quantity generators will apply (e.g., 100 kg limit in USEPA regulations).

A potential limitation of the extraction of samples in methanol is an increase in method detection limits (MDLs). This could cause the MDLs to be above relevant screening levels for certain targeted chemicals. MI soil samples for volatile analyses can be tested using Selected Ion Monitoring (SIM) laboratory methods to reduce method reporting limits to target action levels for samples preserved in methanol. The SIM methods target a small number of select compounds instead of a full standard VOC list, and typically allow an order-of-magnitude reduction in reporting limits in comparison to standard Method 8260 analysis. If problems persist, then the investigation objectives should be reviewed and discussed with the overseeing regulatory agency. High-quality sample data with elevated detection limits are preferable to low-quality data with lower detection limits.

Freezing Increments

Although not ideal, sample increments can be frozen immediately after collection and shipped to the laboratory for combination in methanol (USEPA, 2002a). This might be unavoidable due to the logistical difficulties of obtaining, storing, and shipping methanol to a laboratory.

Sample increments should be stored in individual devices constructed specifically for this purpose that have vapor tight seals and are designed for zero headspace (e.g., Core N' One™, EnCore™, or equivalent type sampler; see Figure I-1). An alternative is to place multiple increments into a vapor-tight jar provided by the laboratory. This risk disturbance of the increments however, and loss of VOCs.

Increments should be immediately frozen in the field to between -7°C and -15°C if possible. This approach provides for a 14-day holding time but is not as reliable as methanol extraction in the field. Prepare ice mixed with saltwater ice to achieve the target temperature range (e.g., mix 25 grams of sample for every 100 grams of ice; Hewitt, 1999). If dry ice is utilized, then packing methods should be placed between the sample containers and the ice to avoid damage to the containers or seals. Dry ice can achieve a temperature of -40°C and can cause severe damage to skin if touched. Check with the shipper for specific procedures, including the amount of dry ice that can be placed in a single cooler, package labeling, and requirements for the use of a vented cooler. Dry ice is not normally allowed on commercial flights.



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If immediate freezing of the increments is not possible, the store the containers on normal ice between 2°C and 6°C and submit them to the laboratory within 48 hours for combination and extraction in methanol. This approach has the highest risk of VOC loss and non-representative data error and should be avoided if possible.

Collection of Soil Gas Samples

Soil sample collection methods described above might not be feasible for example investigations to be carried in remote areas where transport and storage of methanol is precluded due to logistical or safety reasons or keeping samples frozen in the field is similarly not possible. Soil gas sample data can be used as an alternative for assessment of risk. The primary risks associated with volatile chemicals are vapor intrusion into overlying buildings and/or leaching of the contaminant into underlying groundwater. In both cases, the collection of soil gas sample data can serve as a more directly applicable alternative to soil sample data. Soil gas-based action levels for vapor intrusion risk and leaching concerns are provided in the HDOH EAL guidance (HDOH 2017; refer also to Section 13 of the TGM). Direct testing of groundwater can serve as an alternative to use of soil gas action levels for leaching concerns if practicable.

Note that neither soil gas nor groundwater data are reliable for estimation of the total mass of a volatile chemical present in soil. This is because the majority of the mass is likely to be sorbed to organic carbon and clay in the soil itself. Use of simplistic equilibrium partitioning models to predict the sorbed concentration and mass can significantly underestimate the actual mass of contaminant present and lead to failure of *in situ* remedial actions.



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TABLE I-1 Volatile Chemicals Requiring Field Preservation of Soil Sample Increments

CHEMICAL PARAMETER	Physical State		Molecular Weight	² Vapor Pressure	Henry's Law Constant (H)
	¹ Physical State			mm Hg (25C)	(atm·m ³ /mol)
VOLATILE CHEMICALS					
Preserve Samples in Methanol in the Field (or approved alternative, see text)					
(VP>1 and Molecular Weight <200)					
ACETONE	V	L	58	2.3E+02	3.9E-05
BENZENE	V	L	78	9.5E+01	5.61E-03
BIS(2-CHLOROETHYL)ETHER	V	L	143	1.6E+00	1.7E-05
BROMODICHLOROMETHANE	V	L	164	5.0E+01	2.1E-03
BROMOFORM	V	S	253	5.4E+00	5.4E-04
BROMOMETHANE	V	G	95	1.6E+03	6.3E-03
CARBON TETRACHLORIDE	V	L	154	1.2E+02	2.7E-02
CHLOROBENZENE	V	L	113	1.2E+01	3.2E-03
CHLOROETHANE	V	G	65	1.0E+03	1.1E-02
CHLOROFORM	V	L	119	2.0E+02	3.7E-03
CHLOROMETHANE	V	G	50	4.3E+03	8.8E-03
CHLOROPHENOL, 2-	V	L	129	2.5E+00	1.1E-05
DIBROMOCHLOROMETHANE	V	S	208	5.5E+00	7.8E-04
DIBROMOETHANE, 1,2-	V	S	188	1.1E+01	6.6E-04
DICHLOROBENZENE, 1,2-	V	L	147	1.4E+00	1.9E-03
DICHLOROBENZENE, 1,3-	V	L	147	2.2E+00	1.9E-03
DICHLOROBENZENE, 1,4-	V	S	147	1.7E+00	2.4E-03
DICHLOROETHANE, 1,1-	V	L	99	2.3E+02	5.6E-03
DICHLOROETHANE, 1,2-	V	L	99	7.9E+01	1.2E-03
DICHLOROETHYLENE, 1,1-	V	L	97	6.0E+02	2.7E-02
DICHLOROETHYLENE, Cis 1,2-	V	L	97	2.0E+02	4.1E-03
DICHLOROETHYLENE, Trans 1,2-	V	L	97	3.3E+02	9.3E-03
DICHLOROPROPANE, 1,2-	V	L	113	5.3E+01	2.9E-03
DICHLOROPROPENE, 1,3-	V	L	111	3.4E+01	3.7E-03
DIOXANE, 1,4-	V	L	88	3.8E+01	4.9E-06
ETHANOL	V	L	46	5.9E+01	6.3E-06
ETHYLBENZENE	V	L	106	9.6E+00	7.8E-03
METHYL ETHYL KETONE	V	L	72	9.1E+01	5.6E-05
METHYL ISOBUTYL KETONE	V	L	100	2.0E+01	1.4E-04
METHYL TERT BUTYL ETHER	V	L	88	2.5E+02	5.9E-04
METHYLENE CHLORIDE	V	L	85	4.4E+02	3.2E-03
STYRENE	V	L	104	6.4E+00	2.7E-03
tert-BUTYL ALCOHOL	V	L	74	4.1E+01	1.2E-05
TETRACHLOROETHANE, 1,1,1,2-	V	L	168	4.6E+00	2.4E-03
TETRACHLOROETHANE, 1,1,2,2-	V	L	168	4.6E+00	3.7E-04
TETRACHLOROETHYLENE	V	L	166	1.9E+01	1.8E-02
TOLUENE	V	L	92	2.8E+01	6.6E-03
TPH (gasolines)	V	L	108	6.8E+02	7.2E-04



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CHEMICAL PARAMETER	¹ Physical State		Molecular Weight	² Vapor Pressure	Henry's Law Constant (H)
				mm Hg (25C)	(atm·m ³ /mol)
VOLATILE CHEMICALS					
Preserve Samples in Methanol in the Field (or approved alternative, see text) (VP>1 and Molecular Weight <200)					
TRICHLOROETHANE, 1,1,1-	V	L	133	1.2E+02	1.7E-02
TRICHLOROETHANE, 1,1,2-	V	L	133	2.3E+01	8.3E-04
TRICHLOROETHYLENE	V	L	131	6.9E+01	9.8E-03
TRICHLOROPROPANE, 1,2,3-	V	L	147	3.7E+00	3.4E-04
TRICHLOROPROPENE, 1,2,3-	V	L	145	3.7E+00	2.8E-02
VINYL CHLORIDE	V	G	63	3.0E+03	2.7E-02
XYLENES	V	L	106	8.0E+00	7.1E-03

Reference: Appendix 1, Table H in HEER Office Environmental Hazard Evaluation guidance (HDOH, 2017 and updates).

1. Physical state of chemical at ambient conditions (V - volatile, SV - Semi-Volatile (*SV - Treated as "volatile" in USEPA risk assessment models if $H \geq 0.00001$), S - solid, L - liquid, G - gas).
2. Vapor Pressures from National Library of Medicine TOXNET or ChemID databases.
3. Check with lab to determine feasibility of wet sieving sample to remove >2mm particles prior to subsampling.
4. Soil or sediment samples that consist entirely of <2mm material *do not* require drying and sieving to address fundamental error concerns, although some degree of drying and sieving may be desirable by the laboratory for testing purposes.



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Table I-2 Semi-volatile or Otherwise Unstable Chemicals Requiring Laboratory Subsampling of Soil Samples Prior to Processing (refer to Appendix K, Section K.6)

CHEMICAL PARAMETER			² Vapor Pressure		Henry's Law Constant (H)
	¹ Physical State	Molecular Weight	mm Hg (25C)		(atm·m ³ /mol)
SEMI-VOLATILE AND OTHER SEMI-STABLE CHEMICALS					
^{3,4}Subsample Multi Increment Bulk Sample at Laboratory Upon Receipt Without Drying (VP 0.1 to 1.0 OR Liquid at 25C OR Henry's Constant >1.0E-05)					
BIPHENYL, 1,1-	*SV	S	154	8.9E-03	3.2E-04
BIS(2-CHLOROISOPROPYL)ETHER	*SV	L	171	8.5E-01	1.1E-04
DALAPON	*SV	L	143	1.9E-01	9.0E-08
DIBROMO,1,2- CHLOROPROPANE,3-	*SV	L	236	5.8E-01	1.5E-04
DIMETHYLPHENOL, 2,4-	SV	S	122	1.0E-01	9.5E-07
HEXACHLOROBUTADIENE	SV	S	261	2.2E-01	1.0E-02
HEXACHLOROETHANE	SV	S	237	4.0E-01	3.9E-03
ISOPHORONE	SV	L	138	4.4E-01	6.6E-06
⁵ MERCURY	*SV	S	201	2.0E-03	-
METHYL MERCURY	SV	S	216	-	-
NITROBENZENE	*SV	L	123	2.5E-01	2.4E-05
NITROGLYCERIN	SV	L	227	2.0E-04	9.8E-08
NITROTOLUENE, 4-	SV	S	137	1.6E-01	5.6E-06
NITROTOLUENE, 2-	*SV	S	137	1.9E-01	1.2E-05
NITROTOLUENE, 3-	*SV	S	137	2.1E-01	2.4E-05
⁶ PAHs (varies, see Table 4-2b)	*SV	S			
PHENOL	SV	S	94	3.5E-01	3.4E-07
PROPICONAZOLE	SV	L	342	1.0E-06	4.1E-09
⁷ TPH (middle distillates)	*SV	L	170	2 to 26	7.2E-04
TRICHLOROBENZENE, 1,2,4-	*SV	S	181	4.6E-01	1.4E-03

Reference: Appendix 1, Table H in HEER Office Environmental Hazard Evaluation guidance (HDOH 2017 and updates).

- Physical state of chemical at ambient conditions (V - volatile, SV - Semi-Volatile (*SV - Treated as "volatile" in USEPA risk assessment models if H ≥ 0.00001), S - solid, L - liquid, G - gas).
- Vapor Pressures from National Library of Medicine TOXNET or ChemID databases.
- Check with lab to determine feasibility of wet sieving sample to remove >2mm particles prior to subsampling.
- Soil or sediment samples that consist entirely of <2mm material *do not* require drying and sieving to address fundamental error concerns, although some degree of drying and sieving may be desirable by the laboratory for testing purposes.
- The stability of a targeted metal depends in part on the species present and can be highly variable. Identification of specific species of a metal may require the collection of aliquots prior to drying and sieving and should be evaluated on a site-by-site basis with respect to the site investigation objectives
- PAHS - See Table I-3. Eighteen targeted PAHs listed in Section 9 of the HEER Office TGM.
- TPH diesel may not be adequately extractable from soil or sediment when placed in methanol; aliquots should be collected and extracted at the laboratory (e.g., using methylene chloride).



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Table I-3 Physiochemical Constants for Targeted PAHs (refer to Appendix K, Section K.6)

³ Targeted PAHs	¹ Physical State	Molecular Weight	² Vapor Pressure mm Hg (25C)	Henry's Law Constant (H) (atm·m ³ /mol)	
Semi-Volatile PAHs (VP 0.1 to 1.0 OR Liquid at 25C OR Henry's Constant $\geq 1.0E-05$) ^{3,4} Subsample Multi Increment Bulk Sample at Laboratory Upon Receipt Without Drying					
ACENAPHTHENE	*SV	S	154	2.2E-03	1.8E-04
ACENAPHTHYLENE	*SV	S	152	6.7E-03	1.5E-03
ANTHRACENE	*SV	S	178	6.6E-06	5.6E-05
FLUORENE	*SV	S	166	3.2E-04	9.5E-05
METHYLNAPHTHALENE, 1-	*SV	S	142	6.7E-02	5.1E-04
METHYLNAPHTHALENE, 2-	*SV	S	142	5.5E-02	5.1E-04
NAPHTHALENE	*SV	S	128	8.5E-02	4.4E-04
PHENANTHRENE	*SV	S	178	1.2E-04	3.9E-05
PYRENE	*SV	S	202	4.5E-06	1.2E-05
Non-Volatile PAHs (VP <0.1 AND Solid at 25C AND Henry's Constant <1.0E-05) ⁴ Dry and Sieve Multi Increment Samples for Preparation of Aliquots					
BENZO(a)ANTHRACENE	NV	S	228	5.0E-09	1.2E-05
BENZO(a)PYRENE	NV	S	252	5.5E-09	4.6E-07
BENZO(b)FLUORANTHENE	NV	S	252	5.0E-07	6.6E-07
BENZO(g,h,i)PERYLENE	NV	S	276	-	1.4E-07
BENZO(k)FLUORANTHENE	NV	S	252	9.7E-10	5.9E-07
CHRYSENE	NV	S	228	6.2E-09	5.1E-06
DIBENZO(a,h)ANTHTRACENE	NV	S	278	9.6E-10	1.2E-07
FLUORANTHENE	NV	S	202	9.2E-06	8.8E-06
INDENO(1,2,3-cd)PYRENE	NV	S	276	1.2E-10	3.4E-07

Reference: Appendix 1, Table H in HEER Office Environmental Hazard Evaluation guidance (HDOH, 2017 and updates).

- Physical state of chemical at ambient conditions (V - volatile, SV - Semi-Volatile (*SV - Treated as "volatile" in USEPA risk assessment models if $H \geq 0.00001$), S - solid, L - liquid, G - gas).
- Vapor Pressures from National Library of Medicine TOXNET or ChemID databases.
- PAHS - Eighteen targeted PAHs listed in Section 9 of the HEER Office TGM. Recommendation to subsample the Multi Increment sample without drying applies primarily to acenaphthene, acenaphthylene, anthracene, fluorene, methylnaphthalenes, naphthalene and phenanthrene and pyrene.

Soil or sediment samples that consist entirely of <2mm material *do not* require drying and sieving to address fundamental error concerns, although some degree of drying and sieving may be desirable by the laboratory for testing purposes.



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APPENDIX J: COLLECTION OF SEDIMENT SAMPLES

APPENDIX J. COLLECTION OF SEDIMENT SAMPLES

J.1 GENERAL

Well-thought-out investigation questions and Decision Units (DUs) are required for sediment investigations in the manner as done for soil investigations. Designate vertical DU layers as necessary to meet site investigation objectives, including assessment of risk (human or ecological) and optimization of remediation). Designation of the targeted sediment particle size is an important factor in the selection of tools for sample collection. Consideration of the degree of water saturation is also important, especially at stagnant sites where there is a progressive transition from the water column through a muck layer before reaching semi-consolidated and collectable sediment. Multi Increment (MI) water samples or passive diffusion bag samples might be more appropriate for testing of the muck layer. Refer to Section 3.3.5 and Section 6 for additional guidance and examples.

Multi Increment samples that meet minimum increment number and bulk sample mass requirements discussed in Section 3.6.2 should be adhered to for characterization of designated DUs (see also Appendix D). This includes collection of a minimum 30-increment and 1 to 3 kg sample. Consider water content when addressing the target bulk sample mass. The water content of saturated, fine-grained, clayey sediment can be well over 50%. This might require the collection of a larger sample mass to address sample collection error and provide enough material to the laboratory for testing after drying.

Additional procedural information on sediment sampling is available from many sources including Superfund Program, Representative Sampling Guidance, Volume 5: Water and Sediment (USEPA, 1995), USGS National Field Manual for the Collection of Water-Quality Data (USGS, 2005), and Field Sampling Procedures Manual (NJDEP, 2005). These documents focus on past, less-reliable, discrete sample collection methods but still include useful considerations for designation of DUs and characterization of sediment in general.

With proper planning and equipment, the collection of MI samples from sediment in relatively shallow water (e.g., <5 m deep) does not involve significantly more effort than required for the collection of surface soil samples. Various types of sampling equipment are available, as reviewed in this Appendix. Consider the type and characteristics of the water body associated with the sediment to be sampled when selecting sampling equipment. Factors include the depth and flow of water, tidal influences, sediment type and consolidation and the thickness/depth of the targeted DU layer(s) of the sediment to be sampled.

If both sediment and surface water samples are collected in the same location, collect the surface water sample first. Refer to HDOH (2021) for guidance on the designation of DUs and collection of MI-type samples from surface water bodies. If several sediment samples are collected from a streambed, collect the most downstream sample first with subsequent samples collected while proceeding upstream.

J.2 SMALL, SHALLOW WATER BODIES

Consider a simple, manual tube-shaped sampler for collection of increments from relatively shallow (<2 m) and easily accessible, calm water. to ensure cylindrical-shaped increments (see Figure J-1). These samplers can be purchased or made by attaching a sturdy, hollow, metallic tube to an adequately long pole. Use of a 2-cm diameter tube will generate an approximately 40- to 50-gram increment for each 10 cm of sediment, ideal for



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a 30-increment, 1 to 3 kg sample. A sediment core catcher insert might be needed to collect increments of very loose, sandy soil (Figure J-2).



Figure J-1. Collection of sediment increments from a drainage canal.

Upper Left Photo: Designation of a sediment DU in a canal for the collection of a Multi Increment sample (DU depth interval 0-15cm).

Upper Right Photo: Sampling tube pushed into sediment to target depth.

Bottom Left Photo: Increment core pushed out of tube using disposable 3/4-inch wooden dowel. Tilt the tube slightly backward before pushing out sample to drain excess water, being careful not to lose the sediment.

Bottom Right Photo: Increment collected on disposable plate and placed into sampling container (e.g., one-gallon freezer bag carried in clean bucket). Note cylindrical shape of increment.



Figure J-2. Sediment core catcher.

If the sediment cover is exceptionally thin (e.g., < 10 cm) then use of use of a cup-type device or a flat-bottom, scoop sampler might be most practical (Figure J-3). These devices can also be used for the collection of increments from coarser-grained sediment or other situations where use of a core catcher for the tube sampler is not practical. A flat-bottom scoop with upright square sides will also help avoid bias to the upper portion of the sediment (see Figure J-3).



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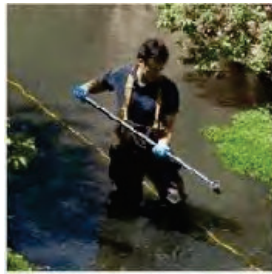


Figure J-3. Alternative scoop-shaped samplers for thin sediment layers.

Marking sediment increment collection locations in a stream or canal can be challenging. Consider placing a long, floatable rope (or tape measure) with a marked spacing within the DU (see Figure J-3). A long tape measure with increment positions marked by pins or flags can also be placed along the edge of the waterway to guide sample collection. Refer to Appendix F for guidance on increment spacing in long, narrow DUs.

Take care to minimize disturbance and loss of an increment as the sampling device is being lifted. Contamination is often concentrated in the organic carbon- and/or clay-rich fines fraction. If sediment fines are preferentially lost during increment collection, then the resulting sample will not be representative. Decant excess water from collected sediment MI sample by waiting several minutes and then carefully pouring excess water out of the container. Use a cellulose paper filter to catch and re-place fine sediment back into the container as necessary. Note that the collection of undisturbed, anaerobic sediment samples for geochemical analysis, if required, might require alternative methods. This should be discussed with the overseeing regulatory agency prior to sample collection.

J.3 LARGE, SHALLOW WATER BODIES

Increment Collection

Alternative tools and methods are required for the collection of sediment samples from larger and/or water bodies up to a few meters deep. Figure J-4 depicts a core sampler used to collect samples from the upper one meter of sediment in an estuary. A clear, 50-cm to 75-cm tube is attached to the end of the extendable push rod. A small boat and Global Positioning System (GPS) device can be used to maneuver to pre-established, increment collection locations within the DU areas.



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Figure J-4. Use of prefabricated, manual core sampling device to collect sediment increments.

Left Photo: Core sampler attached to valve and push rod.

Middle Photo: Manual collection of sediment core increment from skiff.

Right Photo: Individual core increments collected from a sediment DU.

The coring device is manually forced into the sediment to the targeted depth and retrieved. A valve at the top of the sampling tube holds in the sediment as the core is extracted. A cap is fitted to the base of the sampling tube as soon as it emerges from the water to minimize sediment loss. The sampling tube is then removed from the valve/push rod, capped on the other end and stored and the boat is maneuvered to the next increment location.

Small Vibracore tools can also be used for the collection of sediment cores in shallow water (Figure J-5). Very simple, Vibracore-type samplers can be made by attached a vibrating device (e.g., an orbital sander) to a hollow, metal tube of appropriate diameter and length. Use of a Vibracore is described in the following section on the collection of sediment cores in deep water.



Figure J-5. Mini Vibracore sampling device.

Direct-push or other types of sediment core-type samplers can also be mounted to a flat-bottom boat and used to collect sediment samples from water up to 10 m or more deep. More recent designs include small, weighted platforms that can be lowered to the top of the sediment for coring (Figure J-6; see case study in Appendix C). Core increment collection and sample preparation methods are carried out in a similar manner as described for investigation of subsurface soil in Appendix G. Sediment core samplers have the ability to retain the integrity of sediment horizons with minimal disturbance and allow the collection of unbiased core-



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shaped increments. Sections of core specific to targeted DU layers, representing increments for those layers, are either removed and combined in their entirety between borings for later subsampling or subsampled in place and a final bulk sample prepared in the field. The latter is identical to subsampling of soil borings described in Appendix G.



Figure J-6. Submersible platform used to collect sediment increment cores within a targeted DU (manufactured by Specialty Devices Inc.).

Sample Preparation

Once all cores for a targeted, DU area have been collected, cores are individually extracted and increment sections specific to a targeted, DU layer progressively combined to prepare a sample for that layer (Figure J-7). The base cap is removed from the bottom of the tube and the tube placed on a plunger. The upper cap is removed and the tube is pulled downwards, pushing the core out of the top and progressively exposing individual DU layer increment sections. Once exposed, the increment specific to a targeted DU layer is cut away (e.g., using a stainless-steel spatula) and placed in a container specific to that DU layer (see Figure J-7).



Figure J-7. Removal of Sediment Core Increments from Sampling Tubes

Upper Photo: Target DU layers in a core increment.

Middle Photo: Removal of increment by forcing sampling tube downward on a plunger; target DU layers removed from core and placed in dedicated container for combination with increments from other cores collected from the DU.

Lower Photo: initial bulk Multi Increment samples prepared by combination of core increments for each DU layer (layers representing 3 different sediment depth intervals in the DU).



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Figure J-8. Field subsampling of a sediment Multi Increment bulk sample.

Left Photo: Sample spread out into a 1- to 2-cm thick layer; large rocks and debris removed.

Middle Photo: Flat-edge spatulas used to collect subsamples in a systematic, grid fashion.

Lower Photo: Bulk Multi Increment sample prepared by representative subsampling, for shipment to the laboratory.

Bulk samples can either be sent to the lab for processing or, if needed due to large sample volume, processed in the field to reduce mass. In the latter case, the sample is placed on clean, plastic sheeting and spread out to a thickness of about 1 to 2 cm (Figure J-8). A flat edge spatula is then used to collect subsamples in a systematic, random (grid) fashion. A minimum of 30 subsamples should be collected to ensure that the resulting, reduced sample is reasonably representative of the original sediment collected and minimize error in the final data. Submit the final samples to the laboratory for further processing and testing in accordance with MI sampling methods (refer to Appendix K). The excess sediment for each DU layer can be retained as split samples for additional testing as needed.

Consider the collection of subsamples in the laboratory for testing without drying for sediments that consist primarily of <2 mm particles to reduce sample preparation and analysis time. Drying and sieving are carried out primarily to remove large particles. A sediment moisture content analysis is also necessary if the laboratory subsamples are collected without first drying the bulk MI sample, to report the laboratory data on a dry weight basis.



J.4 DEEP WATER

Alternative sample collection methods are required for deeper or otherwise less accessible sediment. Vibracore drilling rigs are ideal if available and amenable to the type of sediment to be collected (Figure J-9). Large Vibracore core rigs can be used to collect core increments in water tens of meters deep.

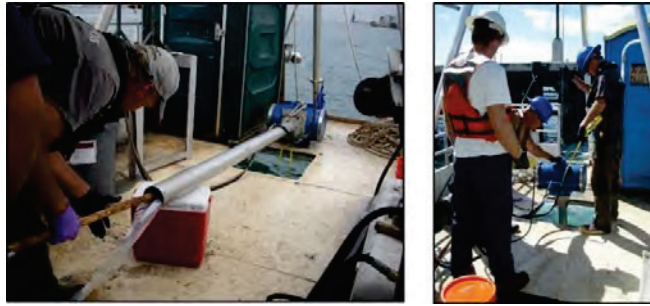


Figure J-9. Use of a Vibracore device to collect sediment samples in deep water.

Left Photo: Vibracore sediment coring device with liner being installed; electric vibrator attached to top of sampling tube.

Right Photo: Vibracore lowered to top of sediment at increment collection location.

A small pontoon boat equipped with a GPS device can be used to collect increments and prepare samples for submittal to the laboratory final processing and testing. The GPS is used to locate pre-established increment sample collection points. A metal sampling tube with an inner liner is fitted to the base of an electric motor (see Figure J-9). The device is lowered to the sediment interface using a small wench. The motor is then used to vibrate the sampling tube into the sediment. The depth of penetration is monitored at the surface using a tape measure attached to the top of the device. A sediment catch is connected to the base of the tube to retain the sediment core when collected.



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Samples for targeted, DU layers are prepared in the same manner as described above for increments collected in shallow water using more simple devices (refer to Section J.3.2). In this case, however, increment subsamples are collected after a core has been placed horizontally on a table and the full extent of sediment exposed. Identify increments associated with targeted DU layers, considering compaction during collection of the core (Figure J-10). Collect a subsample of sufficient mass from each increment to meet the targeted, bulk sample mass for the DU layer as a whole and place in a container specific to that layer. This might require the removal of multiple, small plugs of sediment from the targeted core length. Avoid the need for additional processing and subsampling in the field to further reduce bulk sample mass.



Figure J-10. Removal of increment core from Vibracore sampling tube and preparation for subsampling. Bulk Multi Increment sample prepared by combination of increment subsamples from all cores collected within the targeted DU.

Increment collection and sample preparation can be expedited by “stacking” multiple increments in a single tube when only a single and relatively thin, surficial DU layer of sediment is to be tested. Assume, for example, that the upper 25 cm of sediment is designated for sample collection. A 2.5m long collection tube can be used to collect 25 cm increments from up to eight points without bringing the Vibracore aboard the boat between collection points. After the first increment is collected and held in the tube by the sediment catch, the Vibracore is lifted off the sediment floor one or two meters and slowly moved to the next increment location for collection of another 25 cm increment in the same sampling tube. This is repeated at up to six additional increment point locations.

The sampling device is then retrieved to the surface. The core is removed from the sampling tube and the liner cut open to expose the sediment. Determine the target mass of sediment to be removed from the core by dividing the number of increments included by the total number of increments to be collected and multiplying this by the targeted bulk sample mass. For example, if six increments were captured in the core, thirty increments were to be collected and a bulk sample mass of 3 kg to be prepared, then a 600-gram subsample should be collected. This will most efficiently be carried out by collecting regularly spaced, small masses of sediment from the entire length of the core. Smaller masses from a greater number of points will produce the most representative subsample. Refer to Appendix G for the collection of subsamples from subsurface soil cores and Appendix I for the collection of subsamples from cores to be tested for volatile organic compounds



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for additional guidance.

A potential concern in the use of the Vibracore is the loss of very fine sediment when the sample tube is placed horizontally on the pontoon boat for core liner extraction and the spillage of muddy water from the core. Although the bias introduced into the sample data is likely to be small in most cases, methods to better control this issue include removal of the core from the liner while the tube is in a tilted orientation. This will improve the representativeness of the resulting sample data.

Note that the repeated vibration action of the Vibracore during the period that multiple increments collected in the same sampling tube (as well as the nature of the sediment in that location) can cause the sediment in the tube to disaggregate and run or mix. If sediment collected under these circumstances is to be representatively subsampled, the sediment from the entire core would need to be collected, spread to a thin layer on a large flat surface, and systematic random increments collected, as illustrated in the example in Figure J-8.



J.5 DIVER ASSISTED SAMPLE COLLECTION

Diver-assisted sample collection might also be feasible for the collection of shallow sediment increments and samples in some cases. Sampling tubes of adequate length to penetrate the targeted DU thickness and volume to prepare a 1 to 3 kg sample are carried to the targeted DU area in a netted bag (Figure J-11). The diver manually locates an increment collection point in the same manner as described for the collection of surface



Figure J-11. Diver assisted sediment sample collection.

Left Photo: Diver locates sediment increment collection point and pushes sampling tube to targeted DU depth.

Right Photo: Example sample increment collection tube with sediment retained.

soil samples in Appendix F. A sampling tube is then pushed into the sediment to the targeted depth, retrieved, capped on both ends and then placed back into the netted bag.

The diver then proceeds to subsequent increment collection points and repeats the process until all increments are collected. When the collection of increments is complete, the diver inflates a buoy attached to the sample collection bag and allows it to rise to the surface, where it is retrieved and brought into the awaiting boat or otherwise taken ashore. Individual increments are then removed from the individual tubes and combined to prepare a final sample.

J.6 OTHER DEVICES

Other devices used to collect surface sediment samples include center pivot grabs, clamshell pivot grabs and drags, sleds, and scoops (NJDEP, 2005; USGS, 2005). Use of these types of devices to collect MI samples is problematic due to the large volume of material collected and the need for a large area to combine increments and prepare a final sample for submittal to the laboratory. Loss of fines during retrieval is also a concern. If tested as individual, discrete samples, then the resulting data should be considered adequate for gross, screening purposes in the manner described in Appendix E. This could include approximation of large-scale, contaminant distributions zones that can be used to designate risk- or remediation-based DUs and more carefully tested using DU-MIS sampling procedures.



**TGM FOR THE IMPLEMENTATION OF THE HAWAII STATE CONTINGENCY PLAN
SECTION 4
APPENDIX K: LABORATORY PROCESSING OF MULTI INCREMENT SAMPLES**

APPENDIX K: LABORATORY PROCESSING OF MULTI INCREMENT SAMPLES



TGM FOR THE IMPLEMENTATION OF THE HAWAII STATE CONTINGENCY PLAN SECTION 4 APPENDIX K: LABORATORY PROCESSING OF MULTI INCREMENT SAMPLES

APPENDIX K. LABORATORY PROCESSING OF MULTI INCREMENT SAMPLES

K.1 INTRODUCTION

Talk to the laboratory ahead of time to ensure that they are familiar with processing and testing of Multi Increment (MI) samples and that their Standard Operating Procedure (SOP) meets sampling theory requirements, as outlined in this guidance document. This includes drying, sieving, and subsampling in accordance with MI collection protocols for non-volatile contaminants. Increments for samples to be tested for volatile contaminants are placed in methanol in the field or upon receipt at the laboratory (see Appendix I). An additional charge for sample processing is normally added to the basic extraction and analysis fee. An additional fee might also be added for testing of a larger subsample mass than required in the analytical method SOP, as discussed below.

Data for samples that are not processed at the laboratory using procedures described in this subsection, or equivalent, cannot reliably be considered representative of the bulk MI provided from the field. Require the laboratory to document specific sample processing and subsample collection methods in the report, rather than simply reference an applicable guidance document. Photographs of the processed samples can also be requested to support the reliability of laboratory data. Include a summary of laboratory processing and subsampling methods in the investigation report.

Bulk samples collected in the field should be kept to a maximum mass of approximately 1 to 3 kg unless otherwise coordinated with the laboratory, due to handling and storage limitations. Larger samples might be necessary in some cases to generate representative samples but should be discussed with laboratory ahead of time. Laboratories might charge extra for processing and disposal of excess material. Sample mass can be reduced in the field using MI subsampling methods if a larger amount of soil is inadvertently collected (see Section F-2 of Appendix F). This is not recommended as a standard practice, however, due to the unavoidable introduction of additional error and uncertainty into the data. Any field processing of bulk samples should be clearly described in the investigation report.

Laboratory processing of MI samples typically consists of the following steps (USEPA 2003a, 2006; ASTM 2003; AFFCO 2018; ITRC 2020; HDOH 2021):

- Empty entire bulk sample onto tray made of or lined with material compatible with contaminant of interest and drying temperature;
- Spread evenly into thin layer;
- Allow to air dry until a constant weight is established by re-weighing or air dry until soil agglomerates are crushable;
- Sieve entire sample to the target particle size as defined in the DU designation process (e.g., <2 mm);
- Subsample entire sieved portion using a sectorial splitter (preferred) or manual, MI sampling methods to collect appropriate mass for each targeted analysis (minimum ten grams recommended for the <2 mm particle size for all contaminants; including metals).

Establishment of the target particle size is an important part of the DU designation process and should be discussed as part of the systematic planning process (refer to Section 3.3). Inform the laboratory of the



specific particle size range to be isolated and tested for each sample. Separate isolation and testing of multiple particle size ranges might be required in some cases.

Particulate matter <2 mm in diameter is generally considered "soil" for the purposes of an environmental investigation and contaminant analysis, including comparison of data to risk-based action levels (USEPA 2011). Sieving to <2 mm to remove gravel, sticks and other large debris also establishes the maximum particle size of the sample, which is necessary (in accordance with sampling theory) to determine the minimum subsample mass necessary for extraction and analysis in the laboratory. Note that some agencies or risk assessors might require additional testing of the fines fraction for comparison to screening levels and assessment of risk (e.g., <250 μm or 150 μm). This includes testing for contaminant bioaccessibility.

Sample processing is discussed in more detail in the sections below. Contaminant analyses of all soil samples is normally reported on a dry weight basis. This is in part because soil ingestion rates assumed in human health risk assessments are based on dry weight (USEPA 2011). Data for samples that are air dried to constant weight and sieved prior to analysis can be considered dry weight without additional analysis for moisture content. Collect a separate subsample test the moisture content in cases where a sample will not be dried to <10% moisture prior to the collection of subsamples for analysis (e.g., Total Petroleum Hydrocarbons as diesel and semi-volatile chemicals). Remaining soil is disposed of by the laboratory, normally after thirty days (consult laboratory for details).

Make arrangements for longer-term storage with the laboratory if archiving of samples is warranted or decisions on potential additional analyses of remaining, processed material might otherwise not be made within the normal, 30-day holding time before samples are disposed of. Do not archive or test individual increments. As discussed in Appendix D, the concentration of a contaminant in an individual increment collected from a Decision Unit (DU) is irrelevant in terms of sampling theory and the objective to obtain the "true" or "mean" for the DU volume of material as a whole. At a small enough scale (e.g., individual particle or coating on particle), the maximum concentration will *always* be 1,000,000 mg/kg. This fact is immaterial to either risk or the overall objectives of the project.

K.2 SAMPLE PROCESSING

Samples should be spread into a thin layer (~ 0.5 to 1.0 cm) on a large tray and placed in a ventilated area to dry (Figure K-1). This normally takes 24 to 48 hours, depending on the soil type and original moisture condition. Aluminum or plastic trays are commonly used for drying, but should be avoided if aluminum, phthalates or other plastic components are contaminants of potential concern. Paper liners should be avoided if organic carbon is to be tested for or if contaminants are present that could sorb to the paper (e.g., heavy oil).



Figure-K-1. Air drying and sieving of samples.

Samples to be tested for non-volatile chemicals should be air dried under ambient conditions (e.g., 15 to 30°C). Soil moisture content should be reduced to achieve a constant air-dried weight for the samples, as determined by periodic re-weighing or air dry until soil agglomerates are crushable and a separate subsample can be used for moisture analysis and dry weight correction. Drying times can vary between a few hours for course soils with initially low moisture to several days for wet, fine-grained soils. Drying of samples under low temperatures in an oven is acceptable provided that the laboratory has an SOP for this procedure and it can be reasonably assumed that this will not result in significant (e.g., >10%) chemical loss or transformation.

Wet, clayey samples should be periodically crushed with a pestle to avoid formation of hard bricks. Disaggregation should be done in a manner that avoids crushing of rock fragments and other naturally large particles. More intensive particle reduction methods (e.g., grinding) are described below. Be aware that baking a clay-rich sample can result in a brick-like mass that will be difficult to disaggregate and collect a reliable subsample.

Samples should be sieved to <2 mm following drying or alternative, target particle size based on the investigation objectives and then subsampled as described below (USEPA; 2011; see Figure K-1). Note that soil (or sediment) samples that consist entirely of <2 mm material do not require drying and sieving to address fundamental error concerns, although some degree of drying and sieving might be desirable by the laboratory for testing purposes. As noted, data are also normally reported on a dry-weight basis. Exceeding recommended holding times for non-volatile chemicals to permit drying and sieving and minimize subsample collection error is generally acceptable but should be minimized to the extent practicable (USEPA, 2003b). Error associated with poor subsample collection is likely to outweigh error associated with contaminant loss due to exceeding a holding time.

K.3 SUBSAMPLE COLLECTION

Of all the laboratory steps necessary to process and analyze environmental samples, subsampling is widely believed to present the greatest potential for error. The lab subsampling guidance applies to all types of soil samples collected in the field, whether MI, discrete, or judgmental samples. The objective from a laboratory standpoint is to ensure that the data generated are representative of the sample provided.

Laboratory error is much easier to control than field sample collection error and should be minimized to the extent possible. Careful subsampling of the processed sample to collect a small mass for extraction and analysis is critical to ensure that the resulting data are representative of the sample submitted as a whole. Refer to AAFCO (2018) for a detailed discussion of the reliability of different laboratory subsample collection



methods.

The collection of a representative subsample is most reliably accomplished with a sectorial splitter, also called a rotary riffle splitter (Figure K-2). The availability of a sectorial splitter should be used as one of the criteria for selecting a laboratory. The dried and sieved sample is poured into a hopper at the top of the unit and fed in equal amounts into a series of rotating containers. Note that multiple splits using a sectorial splitter might be necessary to reduce the bulk sample mass down to the desired amount for extraction and analysis.



Figure K-2. Use of a sectorial splitter to collect laboratory subsamples from bulk Multi Increment field samples.

As an alternative, a reasonably representative subsample can usually be obtained by collecting 30 or more small increments of equal mass from systematic random locations in a manner (Figure K-3). The total mass of the increments should be sufficient to meet minimum subsample mass requirements for testing, discussed below. This is also referred to as “fractional shoveling” (AAFCO 2018).



Figure-K-3. Manual collection of subsamples in the laboratory.

Fractional shoveling can be carried out in either a “two-dimensional” or “one-dimensional” manner. Following a two-dimensional approach, the processed sample (e.g., dried and sieved) is spread into a thin (e.g., < 1 cm) layer and subsample increments are collected in a systematic random manner, similar to that used to collect the sample in the field (left photo in Figure K-3). Care must be taken to remove the entire mass of soil at the increment collection location, including fine and potentially more contaminated particles that might have



settled to the bottom of the slab cake. This requires the use of a flat-bottomed tool with square sites (see Figure K-3).

Under a one-dimensional approach, the processed sample is spread into narrow lines. A subsample is collected by using the same tool to remove regularly spaced increments along the lines. This approach reduces the risk that fine and oftentimes more contaminated particles get left behind during subsample collection and should be utilized when possible.

Cone and quartering methods are never recommended for the collection of laboratory subsamples. Studies have indicated that these methods have a significantly lower subsample data precision in comparison to subsamples collected manually or using a rotary splitter (AAFCO 2018).

K.4 ANALYTICAL SUBSAMPLE MASS

Table K-1 summarizes the minimum-recommended subsample mass (analytical sample) for testing based on the subsample collection method and whether the sample was milled. Subsample masses should be based on Gy's Theory of Sampling and the need to ensure that the data provided by the laboratory are representative of the sample submitted, not on the minimum mass that can be tested by the laboratory or the desire to minimize costs associated with disposal of waste solvents or use of other laboratory material.

The minimum subsample masses noted apply to all contaminants and all analytical methods. A minimum, subsample mass of 5 to 10 grams is required to address *compositional heterogeneity* between individual particles and associated Fundamental Error for samples where the maximum particle size is <2 mm (refer to Appendix D). A larger subsample mass is required for samples with larger particle sizes and must be estimated on a sample-specific basis using equations for Fundamental Error.

Table K-1. Minimum-recommended subsample (analytical) mass with respect to sample preparation method, maximum particle size and subsample collection method.

¹ Sample Preparation Method	Subsample Collection Method	
	Sectoral Splitter	Manual
Unground (<2 mm)	10 g	30 g
Ground (≤100 μm)	5 g	5 g

Additional bias and error in the data could be introduced due to lateral and vertical, *distributional heterogeneity* within a processed sample and associated Grouping and Segregation Error. A minimum, subsample mass of 10 g is considered to be adequate to address both this error and Fundamental Error if a sectoral splitter is used to collect a subsample from an unground sample (Table L-1). This error is more difficult to control if the subsample is manually collected, due to the tendency for fine and coarse particles to segregation during processing. A larger, minimum subsample mass of 30 g is therefore recommended if a manual collection method is used (refer to Table L-1).

Laboratories might charge an added fee for testing larger subsamples than required by current test method Standard Operating Procedures due to the need for additional reagents or other associated costs. This should



be considered a necessary, additional cost for obtaining reliably representative data for the sample submitted.

It is possible that some commercial laboratories might not be able to extract or otherwise test a 30-gram subsample. If this is the case, then ensure that triplicate subsamples with a mass of at least 10 grams are collected and tested to assess laboratory subsampling precision (refer to Appendix L, Section L.2).

A smaller subsample mass would in theory be adequate to address Fundamental Error for samples composed entirely of fine-grained particles, for example samples that have been sieved to $<250\mu\text{m}$. Segregation of coarser and finer particles within this fraction is still unavoidable, however. Physical collection of a representative subsample also becomes problematic for a target mass less than 10 grams, even if a sectoral splitter is used. A minimum 10-gram subsample is therefore recommended for unground, fine-grained samples.

Grinding or “milling” of samples (Section K.4) to $<100\ \mu\text{m}$ will significantly reduce concerns for both Fundamental Error and Grouping and Segregation Error as well error associated with the physical collection of a subsample. Milling is not normally carried out on environmental samples as a default but might be desirable or even necessary in some cases. If a case-specific decision is made to mill a sample, then the minimum-recommended subsample mass after milling can be reduced to 5 grams and still address Fundamental Error and subsample collection concerns (Table L-1). Use of a sectoral splitter for the collection of subsamples will in most cases not result in a significant, additional reduction of data error over manual subsampling methods but should be considered if available and feasible.

Physical collection of a representative subsample less than 5 grams again becomes problematic, even if a sectoral splitter is used, and is not recommended even if in theory adequate to address Fundamental Error. If necessary, consider collection of a 30-gram subsample and then use of this mass to collect a smaller subsample. Collect subsample replicates to document subsampling method precision.

If the entire sample cannot be ground due to laboratory limitations, then collect the minimum-recommended subsample mass, use a puck mill to grind the subsample to $<100\ \mu\text{m}$ and collect a 5 grams subsample for analysis. Collect and grind replicate, 30-gram subsamples (minimum triplicates) for testing and evaluation of total, subsampling method precision.

Laboratories might need to modify USEPA methods appropriately to achieve the minimum 5- to 30-gram subsample mass for extraction and analysis or conduct multiple small subsample extractions and combine them for analysis. This is primarily a concern for metals, where some methods might call for testing of only 1 gram. With the possible exception of mercury, extraction and testing of 5- to 30-gram subsamples is feasible for most metals if specifically requested. The cost of analysis might increase, but this is the price to obtain reliably representative data and make more confident decisions regarding risk or remediation. Such protocols must be strictly followed to reduce tens or hundreds of tons of soil or sediment down to only a few grams actually tested by the laboratory and generate reasonably representative data for the original DU mass of material as a whole.

Mercury sample extraction mass might be limited to 5 grams or several grams due to the laboratory method involved. If this is the case, then the primary sample should be ground in a manner that does not produce excessive heat and a minimum 5 grams of ground material extracted and tested, with multiple extracts



combined and tested as a single extract solution as necessary.

If direct extraction of the minimum-recommended, subsample mass is still not possible due to laboratory limitations, then perform and combine multiple extractions or average data for multiple extractions until the final data are representative of the recommended mass. Collect replicate subsample data to assess data precision. If replicate subsamples result in an RSD of greater than 15%, then consider combining multiple extracts for testing and representation of a larger, total subsample mass.

The latter described steps necessarily introduce additional error into the resulting sample data. Data that do not meet the above recommendations for minimum, subsample mass should be considered suspect. Limitations on data quality and reliability should be noted in the investigation report and incorporated into final decision-making regarding assessment of risk or design of remedial actions.

K.5 PARTICLE SIZE REDUCTION

K.5.1 Testing of Un-milled Versus Milled Samples

Grinding or “milling” of samples beyond crushing of soil clumps by hand or using a simple mortar and pestle can significantly improve extraction of the sample and subsample data precision. Milling of environmental samples is specifically required for analysis of some contaminants, for example Method 8330B for explosives residues (USEPA, 2006). This is in part due to the fibrous nature of some residues and the difficulty in obtaining a representative subsample from unground media. Note that batch leaching tests are normally run on subsamples from un-milled samples.

Milling is an important part of the mining industry. Data quality objectives typically require the total mass of the commodity present in a stockpile of crushed ore (e.g., iron or gold) to be estimated within a margin of error of less than 5% - far more stringent than normally allowed for collection and testing of environmental samples (refer to Appendix D and Appendix L). The exact error in sample data collected as part of a mining operation is ultimately determined when the commodity of interest is extracted from the processed ore and weighed.

The need to incorporate milling of samples to be used to assess environmental risk should, however, be evaluated on a case-by-case basis and discussed as part of the site investigation objectives. In contrast to the mining industry, environmental risk is more typically assessed in terms of the leachable or “bioavailable” fraction of the contaminant present in media (refer to Section K-6), rather than the total concentration. Another common investigation objective is to estimate the concentration of the leachable fraction of the contaminant that could be stripped from the soil by infiltrating rainfall and subsequently carried into nearby surface water bodies or to underlying groundwater. Batch leaching tests and soil column leaching tests are normally run on un-milled samples to better reflect true field conditions.

Milling of samples could enhance the extractability of the contaminant in soil and introduce bias into sample data in terms of the risk posed under natural conditions. Risk assessors might prefer to directly test the fines fraction of the soil in the absence of milling rather than grind the entire, <2 mm fraction of the sample. This could overlook contaminants in the coarser fraction of the sample, however. As discussed in Section K.3, an alternative way to avoid potential bias due to milling and address error due to the collection of subsamples



from unground samples is to test a larger subsample mass (e.g., 30 g). These data could be combined with bioaccessibility data for the same sample, dependent on the availability of test methods for contaminants of concern (refer to Section K.6).

Milling of soil samples could be appropriate in the following circumstances:

- Presence of large (i.e., > 2 mm) fragments of contaminants in the sample that could contribute to the potential risk to human health and the environment.
- Need to reduce particle size and address subsample collection error identified in replicate subsamples, or
- Need to test smaller subsample masses due to laboratory limitations (e.g., ≤ 10 gram; refer to Section K-4).

Examples of the first scenario include the suspected presence of large chips of lead-based paint in soil around the perimeter of a building. The chips could break down overtime into finer particles. In such cases testing of both un-milled and milled samples should be carried out to evaluate current and potential future risk. The same is true of lead shot in soil. Samples should be milled if particles that could pose potential leaching hazards are present in the sample and could be excluded from the data if un-milled samples are tested (e.g., large nuggets of munitions related compounds such as RDX).

Milling to reduce subsampling error might not be practical in some cases. Releases of PCB containing oils and similar liquids into soil and sediment can lead to the formation of tarry "nuggets," causing error and highly variable replicate data associated with both samples collection in the field and subsamples collection in the laboratory. Milling of the samples to reduce subsampling error is normally not practical, however, due to smearing of the nuggets on milling equipment. In such cases, the only option to obtain more representative data is to collect and test larger subsamples.

Milling can be especially useful when data for replicate MI samples are highly variable, to help discern if the problem is related to field versus laboratory error. Milling samples to achieve very uniform small particle sizes can help reduce Fundamental Error and improve the precision of laboratory subsampling when replicate data suggest a problem. Milling also allows for a smaller subsample and extraction/analysis mass for non-volatile contaminants.

Milling of a minimum 300 gram of soil is recommended (minimum mass necessary to address Fundamental Error). Milling of larger masses (e.g., 1 kg) is preferable. Milling of a minimum 30-gram subsample is recommended in cases where milling of larger masses is not feasible.



K.5.2 Milling Equipment

Puck and ring mills or “puck mills” (Figure K-4) are most commonly employed. Puck mills are able to reach a finer consistency, but can increase the temperature of samples and result in a loss of organic compounds. Puck mills can also normally only grind a small mass of soil at a time. Ball mills are able to mill larger masses of soil (e.g., up to 1+kg), provide more gentle, particle-size reduction and minimize heat generation in comparison to traditional puck mills. Ball mills (Figure K-5) cannot grid a sample to a consistent particle size and should not be relied upon for final sample processing and collection of subsamples. Note that suitable grinders are expensive, add cost to processing and analysis of samples, and might not be available at many labs.

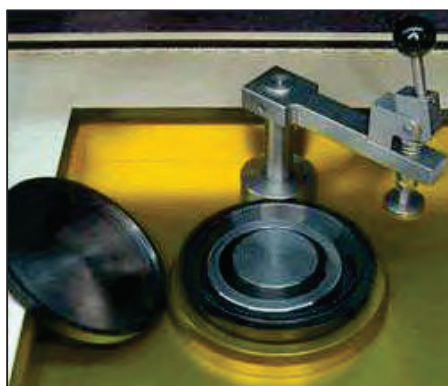


Figure K-4. Puck and ring mill, used to crush small masses of soil to very fine, consistent grain size.



Figure K-5. Ball mill with ceramic cylinders used for moderate crushing of large soil volumes. Ball mills are less able to crush soil to a consistent particle size.

Consider the chemical composition of the mill and target analytes of interest when selecting an appropriate mill. Pucks and rings in puck mills and cylinders in ball mills are typically composed of stainless steel, tungsten carbide or ceramic. Stainless steel pucks and rings or cylinders should, for example, not be used when trivalent chromium is an analyte of interest or when heat generation is a concern (e.g., elemental mercury).

Note that non-elemental, mercury-based compounds used as fungicides at former sugarcane operations such as phenylmercuric acetate are not considered to be significantly volatile or susceptible to loss during



processing, especially in aged releases to soil (USNLM 2016). An experienced lab technician can normally control heat generation by milling a sample in short pulses. A ceramic mill can also be used to minimize heating of the sample, if needed. Ceramic equipment can, however, contribute aluminum to the sample.

K.6 SEMI-VOLATILE AND UNSTABLE CHEMICALS

Samples to be tested for semi-volatile organic compounds (SVOCs) or non-volatile chemicals with a very short half-life (e.g., <30 days) should be immediately subsampled for testing after receipt by the laboratory and prior to air drying and sieving to minimize significant contaminant loss (e.g., >10% of original mass). Refer to Tables I-2 and I-3 in Appendix I for a list of example compounds.

For the purposes of this guidance, a chemical is considered to be semi-volatile if its vapor pressure is between 0.1- and 1.0-mm Hg or if it is a liquid at 25°C or if the Henry's Law Constant exceeds 0.00001atm·m³/mol (USEPA, 2019b). Chemicals that fall into this category include Total Petroleum Hydrocarbon as diesel (TPHD), some polynuclear aromatic hydrocarbons (PAHs) and elemental mercury. A chemical is considered unstable if its half-life is less than 30 days. This will most commonly be a potential concern for pesticides with a low persistence. These criteria might be overly conservative for aged chemicals in soil or other factors that could reduce volatility in comparison to fresh product. Discuss the acceptability to subsample without drying and sieving with the laboratory. Note and justify any deviation from the default recommendations in the laboratory report.

Samples to be tested for SVOCs and other unstable chemicals should be immediately cooled after collection. At the laboratory, the samples should be spread out and subsampled prior to drying and sieving. Surface soil samples that have been exposed to air on site prior to sample collection are acceptable for air drying (if needed) even when determining higher vapor pressure SVOCs. This and other alternative approaches should be discussed with the overseeing regulatory agency and described in the investigation Sampling and Analysis Plan. Check with the laboratory to determine feasibility of wet sieving the sample to remove > 2 mm particles prior to subsampling. An effort should otherwise be made to collect < 2 mm particles in lab subsamples (i.e., avoid collection of gravel or larger materials if possible). A separate subsample should also be collected from the wet material in the same manner as done for targeted analytes and used to test for soil moisture, so analytical results can be converted to a dry-weight basis. Ensure that minimum subsample masses discussed in Section K-4 are met or the limitations of the resulting data otherwise noted.

Note that mercury in soils impacted by release of phenylmercuric acetate and similar mercury-based fungicides is not anticipated to be significantly mobile or volatile and normal MI samples processing methods are acceptable (USNLM 2016). When released to soil, these compounds are expected to dissociate forming relatively stable cations and adsorb to organic matter and clay more strongly than the parent compounds. Volatilization from moist soil and water surfaces will not be significant.

Follow standard sample drying and sieving methods described above if additional tests are required for non-volatile chemicals using a different lab analysis. If both semi-volatile and non-volatile PAHs are targeted as contaminants of potential concern, then include testing for both in laboratory subsamples collected from the sample prior to drying and sieving. Note that naphthalene can be reported under most VOC analyses if the laboratory is notified ahead of time.



K.7 TESTING OF SAMPLES FOR CONTAMINANT BIOACCESSIBILITY

Adjustment of sample data to reflect the predicted, bioaccessibility and bioavailability of the targeted contaminant is acceptable if the test method has been approved by the overseeing, regulatory agency, Risk-based screening levels developed for soil normally assume that 100% of the target contaminant will be released in the receptor's digestive tract and available for uptake into the body.

Only a fraction of the contaminant is likely to be stripped from the soil and enter the blood stream. The remainder is excreted along with the soil particles. The portion of the contaminant that stripped from the soil and enters the gut (or lung fluids) is referred to as the "bioaccessible" fraction. The portion of the bioaccessible fraction that actually enters the blood stream and cells, where it could cause harm, is referred to as the "bioavailable" fraction.

Expensive and time-consuming animal testing is usually required to accurately estimate the bioavailable fraction of a contaminant in soil. As an alternative, relatively simple methods that estimate the bioaccessible fraction have been developed for some chemicals. In short, the total concentration of the contaminant in the soil sample is first determined through normal analytical methods. A second subsample of the soil is then collected. The mass of the contaminant in the subsample is estimated based on the initial concentration data. The subsample is then placed in a solution of artificial, digestion fluid and agitated for many hours. The fluid is then tested and the concentration and mass of the contaminant that moved into the fluid estimated.

The ratio of the fraction of the contaminant that was stripped from the soil to the original mass of the contaminant in the soil represents the bioaccessible fraction. The bioaccessible fraction is conservatively assumed to represent the bioavailable fraction of the contaminant, even though some of the contaminant stripped from the soil is likely to pass through the digestive tract without being taken up into the body.

The total concentration of the contaminant initially reported for the sample is multiplied by the bioaccessible fraction and the bioaccessible concentration of the contaminant calculated for comparison to risk-based screening levels. Data for related samples are similarly adjusted by the same, bioaccessible fraction for comparison to screening levels.

Consult with the local regulatory agency, laboratories and other experts for methods to test the bioaccessibility of other contaminants in soil. Bioaccessibility test methods are well developed for lead and arsenic (Ruby et al. 1996; SBRC 1999; Ruby 2001; Kelly 2002; Juhasz 2007; HIDOH 2021). Methods are also being developed for other metals and contaminants. The test methods normally recommend that the <250 µm or finer fraction of the soil be tested. The entire, original sample should be sieved to the target, particle size fraction without grinding. Multi Increment subsampling methods should then be used to collect subsamples for total contaminant concentration and bioaccessibility testing.



APPENDIX L: COLLECTION AND EVALUATION OF REPLICATE SAMPLE DATA



APPENDIX L. COLLECTION AND EVALUATION OF REPLICATE SAMPLE DATA

L.1 COLLECTION OF FIELD SAMPLE REPLICATES

Three independent field Multi Increment (MI) samples (primary plus two replicates) should be collected and tested from at least 10% of the Decision Units (DUs) designated as part of a site investigation to assess the precision of the overall sample collection and analysis method. This is accomplished by collection of three increments from each increment grid cell designated for the DU (Figure L-1).

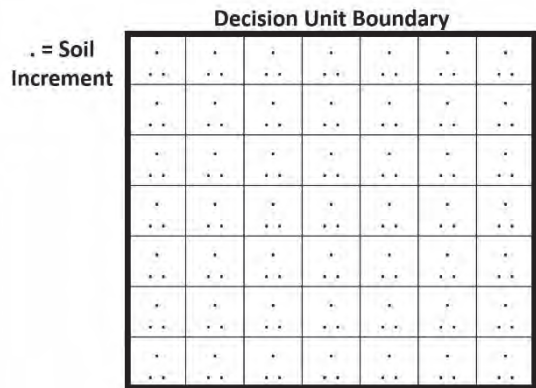


Figure-L-1 Increment locations for collection of replicate samples from a Decision Unit (DU divided in grid cells based on targeted number of increments to be collected).

If a single sample is to be collected from the DU, then a single increment is collected from the center of each grid cell and then combined to prepare a single, MI sample (refer to Section 3.6.2). Three increments are independently collected from each grid cell for preparation of triplicate samples, one increment for each sample. Label the replicate samples “A,” “B” and “C” at the end of the DU identification code (e.g., DU-1A, DU-1B, DU-1C).

Place an equilateral triangle over the center point of the grid (Figure L-2; real or imagined). Label each point “A,” “B” and “C.” Each point represents the increment collection location for one of the three replicate samples. Collect an increment from each point in separate containers labeled with the sample identification number (e.g., plastic bucket with sample identification number taped to side).

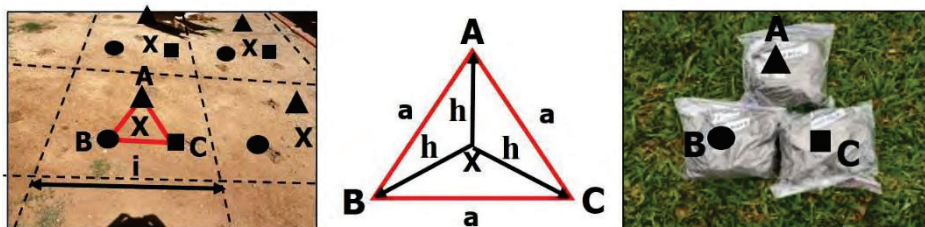


Figure-L-2. Increments for triplicate Multi Increment samples collected at the tips of an equilateral triangle centered on the center point (x) of each increment grid cell.



Use a triangle side length (*a*) equal to 1/3rd of DU increment spacing (*i*). This will provide adequate spacing between replicate sample increments. The length “*h*” from the equilateral center point to the increment sample collection points at the tips of the triangle is calculated by the formula:

$$h = \frac{\sqrt{3}}{2} \times a$$

Assuming the side of the triangle “*a*” equal to 1/3rd of the increment spacing “*i*” yields:

$$h = \frac{\sqrt{3}}{2} \times \frac{i}{3}$$

or (rounding to one significant digit):

$$h = 0.3i$$

An appropriate distance from the center of each grid cell for the collection of increments for triplicate samples is therefore 30% of the increment spacing determined for the DU as a whole. The increment for the first sample is collected immediately above the grid cell cent point (Sample A in Figure L-2). An increment for each of the two duplicate samples is then collected below and 120 degrees to the left and to the right of the center point (Sample B and Sample C in Figure L-2). Laboratory subsample replicates are collected in a similar manner as described above for field samples. Subsamples should be collected in an identical manner and meet minimum requirements for total number of increments and subsample mass.

L.2 COLLECTION OF LABORATORY SUBSAMPLE REPLICATES

The collection of laboratory subsamples is described in Appendix K. Subsample replicates are collected either using sectorial splitter or manually in much the same way as replicate samples are collected in the field. If collected manually, ensure that subsample increments are collected in a systematic, random manner from independent locations with the sample. Be careful to collect the entire mass of soil or other particulate media at the increment location, including fines that might have settled to the bottom of the spread-out sample.

Replicates collected from methanol-preserved samples are used to assess analytical precision, rather than the precision of the method used to collect an aliquot of methanol from the sample container (refer to Appendix I). The potential for volatile contaminants to be unevenly distributed within the methanol and server as a source of data error should be discussed with the laboratory if a significant variability in subsample data is reported.

L.3 EVALUATION OF DATA USABILITY

L.3.1 Review of Field Sample and Laboratory Subsample Collection Methods

The evaluation of data quality begins with a review of the method used to collect samples in the field and subsamples in the laboratory. Refer to Section 3.8 for a checklist of sample and subsample collection methods.

If the field sample and/or laboratory subsample was not properly collected, as described in this guidance, then the reliability and representativeness of the resulting data must be considered unknown even if the precision



of replicate data is very good. This is because statistical tests only assess the ability of the test utilized to estimate a mean for the data set provided. Statistical tests do not directly assess the actual representativeness of the data set provided.

L.3.2 Calculation of Replicate Sample RSDs

The total precision of MI sample data is evaluated based on a comparison of data for replicate samples collected from the same DU. Replicate sample data and data usability are specific to individual contaminants. Replicate data might vary significantly for some contaminants identified in a DU and only slightly for others.

Acceptance criteria for the statistical evaluation of the sample data are established as part of the Data Quality Objectives process for the site investigation. A two-step process is presented. The Relative Standard Deviation (RSD) of the contaminant concentration reported for each replicate sample is first calculated. This provides a measure of the precision of the MI sampling method used to estimate the mean contaminant concentration for the DU in terms of combined field and laboratory error.

Data precision is evaluated by comparing data for replicate samples collected from the same DU. Replicate MI samples are intended to provide estimates of the mean concentration of a contaminant in a DU that approximate a statistically normal distribution. This allows statistical evaluation of data with as few as three replicate samples. The precision of the data for a given DU can be evaluated in terms of the Standard Deviation (SD) or more specifically the Relative Standard Deviation (RSD) of replicates. The SD and RSD reflect the total sum of field and laboratory error in the data (i.e., field sampling error + lab processing/subsampling error + lab analysis error).

The RSD represents the ratio of the standard deviation of the replicate set over the mean of the replicate set, expressed as a percentage:

$$RSD (\%) = \frac{\text{Replicate Standard Deviation}}{\text{Replicate Mean}} \times 100\% \text{ Eq. 2)}$$

The lower the RSD the more precise the sampling approach used, and the more reproducible the data. Replicate MI sample data for the same DU should be normally distributed if the samples are properly collected (Pitard 2019; Esbensen 2020). An RSD $\leq 35\%$ confirms potential normal distribution of the data and is considered to reflect good precision for estimates of the mean. This implies that the sampling method used, including the number, spacing, and size/shape of increments and total mass of soil collected was adequate to capture and reflect small-scale heterogeneity of contaminant distribution within the DU and that error in the laboratory processing and analysis methods was low.

As discussed below, an RSD of 35% is considered to indicate good reproducibility and reliable data for decision making. An RSD of $>100\%$ is considered to be very poor, and not typically appropriate for final decision making (see discussion below). An RSD of $<15\%$ is desirable for laboratory subsample replicate data, although a higher RSD might be required for analytical methods with an inherent poor precision. High RSDs otherwise suggest poor subsampling methods and/or an inadequate subsample mass. Use of a sectoral splitter or even milling (grinding) of the sample might be required to achieve acceptable replicate data results for samples that contain small chips or nuggets of contaminants.



A low standard deviation for soil sample data is achieved by minimizing error in sample collection, processing and analysis to the extent feasible. This, in combination with a low standard deviation of replicate data, indicate high confidence in the representativeness of the data for decision making. When the mean concentration of a contaminant reported for a set of MIS replicate samples is close to the screening level, a lower standard deviation for the replicates provides stronger evidence that the true DU mean is indeed below the action level.

Confidence in the representativeness of data for a single MI sample decreases as the precision of the replicate sample data decreases. An RSD (e.g., >35%) calls into question the normal distribution of the replicate sample data and could be associated with error in the field and/or laboratory. Field sampling error is the most likely source of data variability. Inadequate sample processing and subsampling is the main source of error at the laboratory, rather than analytical error. This can be evaluated by a review of sample collection, processing and subsampling procedures, as well as testing of replicate samples. The field replicate RSDs are used to estimate the total error for the sample data. The lab subsampling and analysis RSDs are used to estimate the lab subsampling and analysis error for the sample data.

The laboratory subsampling and analysis error can then be subtracted from the total error to compare errors attributable to 1) Field sampling, and 2) Laboratory subsampling and analysis. This analysis should be routinely carried out to evaluate sample data and help identify errors that might be corrected. In limited instances, grinding of samples in the laboratory might be required to reduce the grain size and allow the collection of more representative subsamples, since the ability to increase the mass of soil extracted and tested is limited (see Appendix K).

If the RSD for field replicate samples (total error) is unexpectedly high and RSD(s) for the lab subsampling and analysis replicates are reasonably low, then collection of the samples in the field is the likely source of error. A high RSD typically indicates either an inadequate number of increments used to prepare the samples and/or the presence of small nuggets of the contaminant in soil. The precision of field replicate samples for a DU can be improved by increasing the number of increments and total sample mass to provide better coverage and sample support.

Note that the replicate data only evaluate the precision of the overall sample collection and testing method; i.e., the reproducibility of the sample data. The accuracy of the data with respect to the true mean concentration of the contaminant in the subject DU area and volume of soil can only be known by extracting the chemical from the entire volume of soil and measuring the mass. This is routinely done in mining operations (e.g., extraction of gold from crushed ore) but not as part of most environmental investigation and remediation projects, although error in sample data can sometimes be estimated as part of an *in-situ* remediation project. The total error in the data therefore also cannot be determined. The only conclusion that can be stated is that the samples were collected in accordance with Gy's sampling theory and that the precision of the data is good, moderate, poor or very poor.

L.3.3 Data Usability Based on Replicate Sample Precision

Table L-1 presents a recommended approach for evaluation of DU data based on a review of replicate sample data, either collected directly from the DU in question or based from replicate data from similar DUs. Although



somewhat subjective, the approach helps minimize the need to re-sample DUs when proper field and laboratory protocols are followed, while balancing the need to ensure that significant risks to human health and the environment are not inadvertently missed.

If multiple sets of replicate samples were collected from a similar, targeted area, then refer to the replicate data with the highest RSD to assess overall data precision. If separate sets of replicate samples were collected from anticipated low-concentration and high-concentration areas (recommended), then use the RSD calculated for each data set to separately evaluate the precision of data for the respective areas.

RSD ≤ 35% (Good Data Precision)

Direct comparison of unadjusted DU data, or the arithmetic mean of replicate data to target action levels, is acceptable when the RSD of the representative replicate data set for the contaminant of concern is less than 35%. This assumes, of course, that the samples were collected, processed, and tested in an unbiased manner and are reasonably representative of the targeted DU. If soil remediation is carried out then unadjusted DU data can be used for confirmation samples.

35% < RSD ≤ 50% (Moderate Data Precision)

An RSD > 35% but < 50% indicates less reliable but in most cases still acceptable for decision making. A thorough review of field and laboratory procedures should be included in the site investigation report. This review can help identify the need for improvements in field or laboratory methods for future investigations.

Error associated with the sample data can in most cases be assumed to be well within the margin of safety incorporated into most risk-based screening levels. Exceeding a screening level does not indicate that adverse health effects will occur. Toxicity factors and exposure assumptions used to establish safe levels of exposure and develop screening levels typically include a minimum ten-fold safety factor (USEPA 2002b, 2005).

The collection of additional MI samples is recommended for confirmation of remediation of DUs that exceeded action levels, even if Boundary DU data collected during the initial investigation were below screening levels. The confirmation sampling should include the use of a greater number of increments per DU and sample mass and/or division of the area into smaller DUs for re-characterization.

50% < RSD ≤ 100% (Poor Data Precision)

If the RSD of the replicate sample data is between 50% and 100%, it is necessary (again) to review the on-site sampling method and laboratory processing and analysis methods in the investigation, and to discuss the potential causes of the error. Review laboratory replicate sample data to determine if the error might be associated with sample processing and testing, rather than collection in the field.

If laboratory error is suspected, then one or more of the following methods should be used to improve subsampling precision (refer to Appendix K): 1) Use a sectoral splitter to prepare laboratory subsamples rather than manual subsample collection; 2) If manual collection of subsamples is still required, then increase the number of increments used to prepare the subsample; 3) Increase the mass of the laboratory subsample to 30 grams for unground samples or 4) Grind each sample and collect a minimum 10-gram subsample using a sectoral splitter. If data quality adequately improves, then the same method should be used to process and



test all other samples.

If field error is determined to be the cause of the problem, then there are two options: 1) Collect new samples from the affected DUs with a larger number of increments and greater total mass or 2) Use the maximum-reported concentration of the contaminant for DUs with replicate sample data and adjust data for all related DUs upward by the replicate DU RSD. For the first option, increase collect a minimum of 75-increment samples and ensure a minimum, 2 to 3 kg total sample mass. The collection of more than 100 increments per sample is usually not considered beneficial. If replicate precision is still poor in this scenario and the need for remediation still uncertain, then consider the collection of a larger mass of soil and subdivision of the DU into smaller areas for separate testing.

Under the second option, adjust data for a DU where replicate sample data were not collected upwards by the RSD calculated for the replicate sample data set associated with that DU. This approach treats the reported concentration of a contaminant as a hypothetical, replicate sample set mean and generates the highest concentration of the contaminant that would be reported if replicate samples were collected and the same RSD applied. Use of the sample data in this manner should be carried in in coordination with a risk assessor trained in DU-MIS sampling methods and Gy's Theory of Sampling.

Note that the collection of additional samples is not necessary when the reported concentration of the contaminant is well above the screening or cleanup level and there is high confidence that the DU requires remediation. One exception might be the need to obtain a more accurate estimate of total contaminant mass for heavily contaminated DUs to assist in the design of in situ or ex situ remediation projects.

RSD > 100 % (Very Poor Data Precision)

If replicate sample data exceed an RSD of 100%, then both the highest concentration reported for a set of replicate samples and the adjusted concentration of sample data for DUs where replicate samples were not collected cannot be considered to be conservatively representative of the true mean. Very high RSDs can be related to the presence of nuggets or chips of the contaminant in the soil. High RSDs can also be generated as the reported concentration of the contaminant approaches the laboratory reporting level.

Retesting is not required for DUs where the need for remediation is already clear from the data and other field evidence but retesting of other DUs should be considered. A review of field sampling methods and laboratory processing and testing methods should again be evaluated and potential sources of error in the data determined. If laboratory error is suspected, then follow guidance presented above for retesting of samples and re-evaluate corresponding replicate sample data.

Addressing error in the field requires the preparation of larger mass samples from a larger number of increments and possible subdivision of initially tested DUs to better isolate potentially high-concentration areas (refer to Appendices F-J). Addressing laboratory error similarly requires testing of larger mass subsamples from a larger number of points and/or grinding of samples (refer to Appendix L).

In cases where DU data are substantially lower than target screening levels, potential use of the data in a similar manner as described for cases where the replicate RSD falls between 50% and 100% should be reviewed in coordination with a risk assessor trained in MI sampling methods and Gy's Theory of Sampling.



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Larger-mass samples composed of a greater number of increments should be collected to confirm contaminant concentrations in high-risk exposure areas and to confirm any remedial actions.

Localized areas of heavy contamination within a DU can result in an elevated RSD for replicate samples if the samples are not properly collected (i.e., adequate number of increments and bulk sample mass). If known or suspected to be present, then such "source areas" should be designated as a separate DU and independently characterized at the beginning of the project (refer to Section 3.3.2 and Appendix C). This will also assist in optimization of remedial actions, if required.

Belated dividing of an initial Exposure Area DU into smaller DUs for characterization might or might not be beneficial, depending on the nature of contaminant distribution. The use of smaller DUs might not improve data precision, if the contaminant is evenly dispersed throughout the DU but highly heterogeneous at the scale of an individual increment. In this case, an increase in the number of increments collected and the mass of the sample collected will be necessary to obtain representative and reproducible data.



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Table L-1. Recommendations for assessment of data quality based on the relative standard deviation of replicate samples.

Replicate Sample Data Precision	Use of DU Data for Decision Making
<p>Good (RSD≤35%)</p>	<ul style="list-style-type: none"> • Data for DUs where replicate samples were not collected can be assumed to be representative without adjustment; • Compare unadjusted MIS data directly with target screening values (use arithmetic mean of replicate sample data). • Collection of follow-up, confirmation samples for DUs where remedial action is necessary <i>not required</i> if data for Boundary DUs meet target screening levels.
<p>Moderate (35%<RSD≤50%)</p>	<ul style="list-style-type: none"> • Data for DUs where replicate samples were not collected have lower confidence but are adequate for comparison to screening levels or use in a risk assessment without adjustment; • Review and discuss sampling methods and laboratory processing and analysis methods and summarize potential sources of error in reports for future reference (e.g., inadequate increment collection methods, insufficient number of increments, inadequate laboratory processing, etc.); • Compare unadjusted MIS data directly with target screening values (use the arithmetic mean of replicate sample data); • Collection of follow-up, more reliable confirmation samples for DUs where remedial action is necessary <i>required</i> even if data for Boundary DUs meet target screening levels (e.g., number of increments and total sample mass increased; laboratory processing steps improved, etc.).
<p>Poor (50%<RSD≤100%)</p>	<ul style="list-style-type: none"> • Data for DUs where replicate samples were not collected are not reliably representative of the DU mean; • Review and discuss field sampling methods and laboratory processing and summarize potential sources of error in reports for future reference; • If the majority of the total error is due to subsampling or (less likely) analysis in the laboratory, require the laboratory to reprocess and retest the samples, including milling of samples if necessary, with additional replicate subsamples collected and tested to reassess precision; • If replicate sample data precision is still poor, consider retesting affected DUs using samples with a greater number of increments and total, bulk mass; OR, If determined acceptable by a risk assessor trained in Multi Increment sampling methods: • For DUs with replicate sample data, compare of the highest reported concentration of the contaminant to the screening or cleanup level; • For DUs without replicate sample data, adjust the reported contaminant concentration upwards by the RSD calculated for the DU with replicate sample data (Adjusted Data = Original Data + (Original Data x RSD));



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APPENDIX L: COLLECTION AND EVALUATION OF REPLICATE SAMPLE DATA

Replicate Sample Data Precision	Use of DU Data for Decision Making
	<ul style="list-style-type: none"> • Additional evidence of data acceptance (or rejection) should be provided for decision-making purposes, including site history and potential for contamination above the level of concern, adequacy of methods used in collecting, processing and analyzing samples, closeness of data to screening levels and safety margins built into the screening levels, and other information as available and pertinent. • Collection of additional confirmation sampling in DUs where remedial action is necessary required, using samples with a greater number of increments and total, bulk mass and the collection of replicate samples.
<p>Very Poor (RSD>100%)</p>	<ul style="list-style-type: none"> • Data for all DUs are not reliably representative of the DU mean, including data for DUs where replicate samples were collected; • If the majority of the total error is due to subsampling or (less likely) analysis in the laboratory, require the laboratory to reprocess and retest the samples, including milling of samples if necessary, with additional replicate subsamples collected and tested to reassess precision; • Review and discuss field sampling methods and laboratory processing and analysis methods and summarize potential sources of error in reports for future reference; • Retesting is not required for DUs where the need for remediation is already clear from the data and other field evidence. • Consider the collection of new samples in DUs using the following approach: a) If known, designate suspected source areas as separate DUs for individual characterization, b) Collect a minimum of 75 increments per sample; c) Ensure a minimum, 2 to 3 kg final sample mass; d) Collect replicate samples in all anticipated high-concentration and high-risk DUs; • As an alternative, consult with a risk assessor trained in Multi Increment sampling methods regarding the safety level incorporated into the target screening level or cleanup level and the need to resample high exposure risk areas (e.g., all sample data an order of magnitude or more below screening levels). • Additional evidence of data acceptance (or rejection) should be provided for decision-making purposes, including site history and potential for contamination above the level of concern, adequacy of methods used in collecting, processing and analyzing samples, closeness of data to screening levels and safety margins built into the screening levels, and other information as available and pertinent. • Collect replicate confirmation samples in all DUs requiring remediation.



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M.1 FIELD DOCUMENTATION

M.1.1 Surface Soil Sample Logs

Accurate field logs are essential for evaluation and interpretation of analytical results and for preparation of the site investigation report. Details of all field activities, both during initial site inspections and during sample collection, should be recorded. The latter includes documentation of the possession and handling of samples from the time of collection through analysis and final disposition. Copies of the sampling logs, pertinent notes, and photograph logs should be included in the site investigation report.

Similar information should be recorded for borings, trenches, or pits installed to collect MI samples from subsurface DUs as well as the use of any discrete soil samples for initial screening purposes. Deviations from the sample plan caused by conditions encountered in the field (e.g. inadequate tools for sample collection, unanticipated surface debris or subsurface obstacles in sample collection, weather delays, etc.) are also important to document. Site visits to assess field conditions prior to mobilization for the collection of samples are essential and should also be documented in field logs.

An example of a surface soil sampling log is presented as Figure M-1. Include similar information for any discrete soil samples collected. The intended use of the discrete samples and limitations regarding their representativeness should be clearly discussed in the investigation report (refer to Appendix E). Copies of the field logbook, sampling logs, and (if available) photograph logs should be included in the site investigation report.

A log should be prepared for each DU included in the investigation. The logs should at a minimum include the following information:



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Site name and identifier;	Increment spacing;
Name(s) of field personnel or sampler;	Number of increments collected for bulk Multi Increment sample(s);
Date, time;	Type of sampling equipment used;
Unique sample ID or code;	Sample containers;
Sketch map depicting DU shape, dimensions, adjoining DUs, landmarks, north arrow, etc.;	Approximate bulk sample mass;
Decision Unit coordinates (e.g., latitude and longitude of DU corners);	Describe any field processing of sample(s);
Photographs of DU areas;	Soil description;
Depth of DU sampling interval;	Planned sample analyses;
	General comments (e.g., odor, staining, etc.).

Sample Information Sheet

Site Name: _____ Sample ID: _____

Sampler's Name: _____

GPS Coordinates (center point): _____

Date: _____ Start Time: _____ End Time: _____

Weather Conditions: Clear Overcast Rain Wind Other (describe): _____

Media: Soil Sediment Other (describe): _____

Type of Sample: MIS Discrete

Approx DU Area (e.g., ft²): _____ DU Depth Interval (e.g., 0-6"): _____

Number of MI Increments: _____

Increment Spacing (feet, meters, etc.): _____

Sampling Equipment: Soil Probe Drill Trowel Other (describe): _____

Soil Description: _____

Field Processing: _____

Approximate Bulk Sample Volume/Mass: _____

Sample Container: _____

Number of Replicates Collected: _____

Field Observations (structures, vegetation, barren areas, debris, staining, odors, etc.):

Photographs: Yes No Video: Yes No

Decision Unit Description (include basis for DU designation):

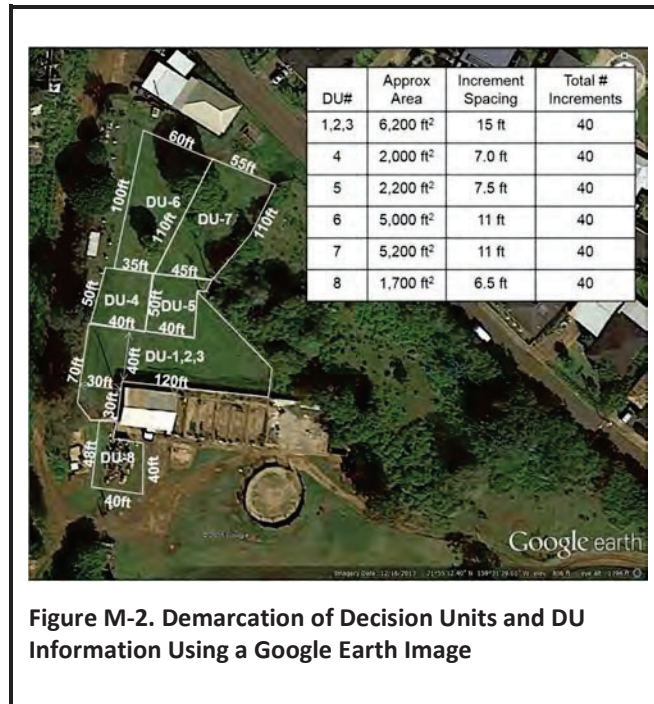
Sketch of Decision Unit (include approximate shape, dimensions, adjoining DUs, landmarks, north arrow, GSP coordinates, etc.):

Figure M-1. Example Surface Soil Sample Log

Adequate information should be included in the sketch map and sample information log to generate a to-scale map of DU locations in the final report (e.g., shape, dimensions, adjoining DUs, landmarks, north arrow, etc.). Depictions of DUs on high-altitude (e.g., satellite) maps or with low-altitude (e.g., drones) photos is acceptable and even preferred provided that distortion is not too great to prevent accurate estimation of dimensions (Figure M-2). Draft DU maps can be made prior to sample collection and adjusted in the field as needed. Final DU maps depicted on aerial imagery can significantly aid in future re-identification of investigated areas.



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Coordinates determined via hand-held Geographic Positioning System (GPS) equipment is acceptable to record the boundaries of Decision Units (e.g. four corners of a rectangular-shaped Decision Unit). The accuracy of the equipment to be used should be documented in the SAP. Any potential variability caused by surrounding forests, structures, or other obstructions to the GPS unit acquiring satellite signals should be taken into account and documented in the investigation report.

A more detailed survey of the site and DU boundaries by a surveyor licensed in the State of Hawai'i is required for maps to be included in an Environmental Hazard Management Plans (EHMP). This is necessary to more precisely document locations where contamination will be left in place for long-term management. The EHMP should include the latitude and longitude of key DU boundary points, along with ground surface elevation data determined within the Hawai'i State Plane Coordinate System to an accuracy of 0.1 foot. Locations of existing buildings or other major landmarks should also be surveyed for reference to the targeted area under long-term management.

The basic rationale for designation of the DU (e.g., suspect spill area, perimeter DU, etc.; see Section 3.3) should be noted in the site documentation. The tools and method used to collect Multi Increment (or other) samples should be described in the sample logs. Note the increment spacing used for each DU (see Section 3.6.2). Record any field processing of the sample(s) collected, including the need to reduce the sample mass due to the original bulk sample(s) being too large for lab processing. Field processing of surface soil samples beyond the removal of large rocks and debris and sieving, if the soil is adequately dry and clay-free, should be avoided (refer to Appendix K).

Record information for field observations and field screening methods used to assist in the identification of potential contaminants of concern or test samples in the field (see Section 8). This might include visual and olfactory observations, or the use of tools such as a photo-ionization detector (PID), portable X-ray



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fluorescence device (XRF), immunoassay test kits or a field Gas Chromatography-Mass Spectrometry [GC/MS] unit. A dehumidification tip should be used with the PID. Field measurements should be recorded and included in the log for the targeted DU.

Recording the spacing of increments is important in order to document that the sample was collected in a systematic random manner. As discussed in Section 3.6.2, the specific locations of individual increments *do not* need to be recorded or included on a map of the DU. This is in part because individual increments cannot be assumed to be representative of the immediately surrounding soil, due to uncertainties from random small-scale variability (refer to Appendix D). The exact location of any given individual increment collection point therefore does not need to be documented.

A basic soil description and classification should be included with the sample log (see Appendix M). Additional and more detailed information regarding soil taxonomy, geotechnical properties and other characteristics that might be required to meet the project objectives should be included as appropriate. A brief overview of consistency, cementation, structure, rock classification, and other information is provided in Appendix M.

M.1.2 Subsurface Soil Sampling/Boring Logs

Logs for samples collected from subsurface DUs should include the same type of information noted above for surface soil samples regarding site conditions, sample collection methods, boring spacing, etc. Record the rationale for the selection of targeted DU layers in the same manner as done for surface soil (refer to Section 3.3). This might include the anticipated known or anticipated depth of contamination, visual or olfactory evidence of contamination during test borings or abrupt changes in soil characteristics. Field processing of subsurface Multi Increment samples is typically required due to the mass of individual core increments and should be described in the logs (refer to Appendix G).

Additional information is required for exploratory borings or borings to be used for the installation of wells. A log for each boring should be prepared which includes the following items, as applicable:



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Name of drilling contractor;	Important stratigraphic boundaries encountered (e.g. depth bedrock);
Borehole coordinates – latitude and longitude;	Hydrogeologic information (e.g. transmissivity, etc.);
Sketch showing the borehole location (including reference distances);	General comments (e.g., odor, staining, etc.);
Diameter and total depth of borehole;	Field measurements (e.g., PID, XRF, etc.);
Type of drilling equipment used (e.g., direct push, auger, air or mud rotary);	Designated DU layers for sample collection;
Drilling fluid and angle (if applicable);	Sample collection equipment used;
Blow counts/Resistance;	Core recovery and portion submitted for analysis;
Depth to water table	Sample identification number;
	Planned sample analyses

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 NUMBER	HYDROGEOLOGIST/GATE		CHECKED BY/DATE							
TYPE	DRIVING WT.	DROP								
LITHOLOGY	DEPTH (FEET)	SP. WT.	WATER CONTENT (%)	S.O.C. (%)	L.O.I. (%)	W.P. (%)	ESTIMATED PERCENT OF			COMMENTS
							GR	SA	FI	

Figure M-3 Example Log for Exploratory Borings or Borings Used for the Installation of Wells

An example boring log is depicted in Figure M-3. The soil descriptions should also include information on density or consistency (primarily when borings are conducted using hollow stem auger) and appearance descriptors of cementation, structural appearance of layers and other features, and other appearance descriptors as applicable to the project.

M.1.3 Soil Description

Soil descriptions for soil sampling events should be made by a trained geologist, geotechnical engineer or soil scientist. The Unified Soil Classification System (USCS) is recommended for basic soil descriptions ([ASTM, 2006d](#); see also [ASTM, 2006e](#); [USDA, 1987](#), [USDA-NRCS, 2007](#); [Nielsen, 2006](#); [US Navy, 2007](#)).

The level of detail appropriate for soil descriptions for a given site is tied to and should be addressed in the site investigation objectives (DQOs). At a minimum the color and estimated nature of the soil in terms of average particle sizes (e.g., gravel versus sand versus clay) should be recorded using a standardized approach.



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More detailed soil descriptions, including laboratory-based measurement of particle size distribution, might be required for more detailed investigations of contaminant fate and transport or to design remedial actions. Maps with taxonomic names for soil on each island are published by the US Department of Agriculture ([USDA, 2015](#)). The accuracy of the maps in highly developed, urban area where soil from other areas may have been imported should be verified.

A summary of key elements of the classification system is provided below. If an alternative classification scheme is used then a summary of terms used and particle size categories should be included in the report.

Recommended Parameters for Soil Descriptions

Classification of soil in accordance with the USCS involves a group symbol, name, and complete word description ([ASTM, 2006d](#)). Key descriptive parameters include:

- Relative proportion of gravel, sand and fines and USCS classification name and symbol;
- Color (Munsell method preferred);
- Consistency;
- Moisture content;
- Staining/discoloration/odor;
- Glass, wire, porcelain fragments or other debris indicative of disposal or fill;
- Other descriptive terms

Descriptive terms denoting the geologic nature of the soil can also be added, including such terms as "saprolite" for soil directly derived from weathered rock or "sediment" for soil associated with unconsolidated terrestrial or marine sediments. Additional soil descriptors can be included as needed based on the DQOs of the investigation (e.g., plasticity, angularity, etc.; refer to [ASTM, 2006d](#)). Properties regarding the *in situ* structural nature of the soil might be required in projects that include a geotechnical component (e.g., density, structure, etc.). A review of properties commonly recorded as part of subsurface borings is provided in Appendix M.

Include notes regarding odors and other observations during drilling, even if these are not apparent in the samples collected. Field aids that combine the USCS classification system with examples of particle sizes, percent estimation of individual components, color, particle angularity and other descriptive criteria are available commercially.

Classification Group Name

An abbreviated summary of the USCS classification scheme is provided in Figure M-4 (after [ASTM, 2006d](#)). Soils are initially classified as "coarse-grained" or "fine-grained," depending on the dominance of gravel and/or sand-size particles versus silt and/or clay-size particles. The term describing the dominant particle size is further modified based on the abundance of other particle sizes, with a code applied to each grouping. The classification scheme somewhat confusingly uses a minimum of 12% clay + silt to describe a sand or gravel as "with fines" but a minimum of 15% sand + gravel to describe a fine-grained soil as "with sand" or "with gravel."



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Figure M-4. USCS Soil Classification Scheme (after [ASTM 2006d](#))

Major Divisions		Code	Description
Coarse-Grained Soils More than 50% retained on a 0.075 mm (No. 200) sieve	Gravels 50% or more of course fraction retained through a 4.75 mm (No. 4) sieve	Clean Gravels (<5% fines)	GW Well-graded gravels, sandy gravels or gravels with sand; little to no fines
			GP Poorly-graded gravels, sandy gravels or gravels with sand; little to no fines
		Gravels with Fines (≥5% fines)	GM Sandy gravels with silt, gravels with sand and silt
			GC Sandy gravels with clay, gravels with sand and clay
	Sands 50% or more of course fraction passes through a 4.75 mm (No. 4) sieve	Clean Sands (<5% fines)	SW Well-graded sands, gravelly sands, or sands with gravel; little to no fines
			SP Poorly-graded sands, gravelly sands, or sands with gravel; little to no fines
		Sands with Fines (≥5% fines)	SM Silty sands, sands with silt
			SC Clayey sands, sands with clay
Fine-Grained Soils More than 50% passes through a 0.075 mm (No. 200) sieve	Silts and Clays		ML Silt, sandy silt, clayey silt, silt with fine sand and clay
			CL Clay, silty clay, clay with silt and fine sand
			OL Organic silt and clay (loam)
Highly Organic Soils		PT	Peat and other highly organic soils

Notes:

- Gravel: ≥5.0mm to <75mm), sand: 0.075-5.0mm, silt: 0.005-0.075mm); clay: <0.005mm.
- Grading refers to the range of particle sizes in the soil. “Well-graded” gravels and sands contain a wide range of coarse particle sizes, poorly graded soils do not.
- Describe coarse-grained soils as “with fines” if ≥12% silt and clay; combine terms if between 5% and 12% fines (e.g., GW-GM). Describe soil as “with sand” or “with gravel” if the soil contains ≥15% sand or gravel.
- Silts and clays can be further defined in terms of liquid limit and plasticity as well as other criteria (see [ASTM 2006d](#)).



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If the second-most dominant grain size makes up >30% of the soil type then include that grain size with the name. For example a soil composed of 30% fines and 75% sand is described as a "silty-clayey sand (SM)." If dominance of the fines by silt versus clay is known then a more specific code can be assigned, for example "SM" for a silty sand or "SC" for a clayey sand. Note that it can be difficult in the field to distinguish between fine sand, silt and clay without significant experience.

A sand with 12% to <30% silt and clay is described as "sand with fines (SM-SC)." Sands with 5% to 12 % fines require dual symbols that include a description of grading, for example "well-graded sand with silt (SW-SM)". A sand with <5% fines is simply described in terms of grading, for example "poorly graded sand (SP)".

Fine-grained soils with >30% sand or gravel are described as "sandy" or "gravelly." Fine-grained soils containing 15% to <30% sand or gravel are described by adding "with sand" or "with gravel" to the group name (e.g., silt and clay with sand, ML-CL). Although not called for in the ASTM document referenced above, it is reasonable for the purposes of an environmental investigation to add "with sand" or "with gravel" to fine-grained soils that contain 5% to 15% coarse-grained particles. Dual classification of a soil type is appropriate if a sample has properties that do not distinctly place it into one group (e.g., SC/CL). Refer to the documents referenced above for additional soil descriptive terms.

Visual Estimation of Grain-Size Distribution

In practice the accurate classification of soils with a large fraction of fines can be challenging in the field without first drying and sieving the sample. Detailed analysis of particle size distribution is most accurately carried out in the laboratory if required as part of the investigation DQOs (e.g., Method D422; [ASTM, 1998](#)). As an alternative, field estimation of particle size distribution can be carried out in the following manner:

- Select a representative sample (Multi Increment sample preferred).
- Remove all gravel-size (>75mm or approximately three inches) or larger particles from the sample. Estimate and record the percent by volume of these particles. Only the fraction of the sample smaller than 75mm is classified.
- Estimate and record the percentage of gravel.
- Considering the rest of the sample, estimate and record the percentage of sand particles, typically the smallest particle visible to the unaided eye.
- Assign the remaining percentage to "fines"; do not attempt to separate silts from clays.

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." Percentage composition figures can assist in estimation of different size or particle type makeup of a sample. More precise lab methods might be required to accurately distinguish fine sand from silt and accurately determine clay composition if this information is required for completion of the field investigation.



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Munsell Color

Color is described by hue and chroma using the Munsell Soil Color Chart ([Munsell, 2000](#)). For uniformity, the HEER Office recommends that investigators utilize this chart for soil color classification. This assists in comparisons of soils from different areas of a site or between sites. The Munsell Color Chart is a small booklet of numbered color chips with names like "5YR 3/4", a specific type of reddish brown. The first part of the code (e.g., 5YR) describes the sample in terms of the basic color group ("hue"). The second part of the code (e.g., 3/4) describes the color in terms of lightness and darkness ("value") and color intensity ("chroma").

Descriptors should also note layering, mottling, gradation, or banding of colors. It is important to note and describe staining that might be related to contamination, particularly if the observation is correlated with other observations of odor, moisture, or appearance (e.g., presence of apparent petroleum liquids or green staining possibly related to contamination with copper-chromium-arsenic).

Consistency

Consistency describes the strength at which soil particles are held together. Descriptors include:

- Loose – Soil easily falls apart;
- Friable – Soil initially holds together but easily crushed with gentle pressure;
- Firm – Soil crushes under moderate pressure and resistance is noticeable;
- Very Firm – Strong pressure required to crush soil; difficult to accomplish with thumb and forefinger.

Soils that are loose and easily crumbled even when wet are usually indicative of a low clay content. Dry soil that is very firm is usually indicative of a moderate amount of clay.

Moisture Content

The moisture content of the soil should be described qualitatively using the following terms and the corresponding definitions:

- Dry - Absence of moisture, dry to the touch.
- Moist - No visible water but moisture is sufficient to bind soil matrix.
- Wet - Visible water, usually when soil is sampled from a water table. In other instances, the wetness may also indicate the presence of non-aqueous phase liquid (NAPL), if accompanied by strong odor or unusual liquid color or viscosity.

Submit samples to a laboratory for followup moisture analysis.

Staining, Odor and the Presence of Contamination

Unusual odors should be noted in logs and soil descriptions if detected when sampling, as they may be related to hydrocarbons, solvents, or other chemical contamination in the subsurface. Hydrocarbon odor may range from gasoline to lubrication oil. Contaminant-related odors also might have a distinctive smell of decaying vegetation or a stronger astringent or sweet odor that could be indicative of solvent compounds.



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Use of a field organic vapor analyzer for screening purposes is recommended when volatile or semi-volatile organic contaminants are expected at a site (refer to [Section 8](#)). Direct inhalation should be avoided if odors suspected to be related to contaminants are detected. A health and safety plan should be prepared for sites where volatile or semi-volatile contaminants are anticipated. A respirator may be required under some circumstances, in addition to other personal protective equipment (e.g., gloves, tyvek suits, safety boots, etc.).

Note and describe staining or unusual moisture found in combination with unusual odors, as the combination of characteristics is often indicative of solvents, petroleum or other Non-Aqueous Phase Liquid (NAPL) contamination in soil (i.e., separate phase liquid not dissolved into water). The staining or moisture indicative of NAPL is often gray to brown in hue but can range in appearance from clear to completely black. Gasoline sometimes imparts a greenish to bluish hue to soil. Along with unusual odor and color, the moisture indicating NAPL contamination most often has an unusual textural aspect. For example, hydraulic fluids may feature a tacky or sticky feel accompanied by a sweet odor, while lubrication oil is most commonly much more viscous than water and accompanied by a dark color and a heavy, musky odor.

Appearance of coarser fragments

Angularity of coarser particles is often an indicator of mode of deposition. The following criteria describe the angularity of 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 edges;
- Angular particles have sharp edges and relatively plane sides with unpolished surfaces. Freshly broken or crushed rock would be described as angular.

Note that both angular and rounded particles can be associated with depositions of volcanic ash.

Example Soil Descriptions

Description of coarse-grained soil samples

A coarse-grained soil is one that is primarily composed of sands and/or gravel particles. A soil is classified as a sand if greater than 50 percent of the coarse fraction is "sand-sized." It is classified as a gravel if greater than 50 percent of the coarse fraction is composed of "gravel-sized" particles.

The written description of a coarse-grained soil should contain the following information:

- USCS classification name based on soil properties (particle size and percentage, plasticity, and other parameters as defined by USCS);
- Munsell color and color number;
- Moisture content;



- Relative density (if determinable);
- Coarse particle angularity and makeup by predominant particle type (e.g., coralline or basaltic).

An example coarse-grained sample description is presented below:

POORLY SORTED SAND WITH SILT, medium- to coarse-grained, SW/SM (minor silt with approximately 80 percent coarse-grained sand-sized shell fragments, and 20 percent medium-grained basalt sand, and 5 percent to 15 percent ML), light olive gray, 5Y 6/2, moist, no odor, subrounded grains.

Description of fine-grained soil samples

Fine-grained soil is subdivided into clays and silts according to its plasticity. Clays are plastic while silts have little or no plasticity. The written description of a fine-grained soil should contain similar information as noted above, in addition to information on plasticity. An example fine-grained sample description is presented below:

SANDY CLAY WITH TRACE GRAVEL, CL (70 percent fines, 30 percent fine sand, with minor amounts of basalt gravel [< 5 percent]), light olive gray, 5Y 6/2, moist, faint odor, firm, moderately plastic.

M.1.4 Additional Sample Information

Additional sample information that might be required for a project includes moisture content, density/consistency, cementation, structure, and rock classification. A brief overview of these topics is provided below (see also [Nielson, 2006](#), [US Navy, 2007](#)).

Density/Consistency (borings)

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 subsurface soil is determined by observing the number of blows required to drive a standard 1 3/8-inch (35 mm) inner diameter (ID) split barrel sampler (commonly termed a standard penetrometer test [SPT] or terzaghi sampler) 18 inches using a drive hammer weighing 140 lbs (63.5 kilograms [kg]) 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 is used (e.g., most commonly in Hawai'i, a Modified California Sampler [MCS] with liners). For a 2-inch ID MCS equipped with brass or stainless steel liners and penetrating a cohesionless soil (sand/gravel), the N-value from the MCS must be divided by 1.43 to provide data that can be compared to the 1 3/8-inch ID SPT sampler data ([University of Southern California, 2001](#)).



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For a cohesive fine-grained soil (silt/clay), the N-value for the MCS should be divided by a factor of 1.13 for comparison with 1 3/8-inch ID SPT sampler data ([US Navy, 2007](#)).

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 limited 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 M-1 and Table M-2 present representative descriptions of soil density/consistency verses N-values.

Table M-1. Measuring Soil Density with Standard Penetration Test and Modified California Sampler – Sands, Gravels

Description	Standard Penetration Test Sampler Field Criteria (N-Value)	Modified California Sampler Field Criteria (N-Value)
	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 M-2. Measuring Soil Density with a Standard and California Sampler – Fine Grained Cohesive Soil

Description	Standard Penetration Test Sampler Field Criteria (N-Value)	Modified California Sampler Field Criteria (N-Value)
	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



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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 – kaolinite, chlorite;
7. Miscellaneous minerals – pyritic, collophane-cemented, glauconite-cemented, gypsiferous, anhydrite-cemented, baritic, feldspar-cemented, etc.

Of these, only 4 through 6 are commonly encountered in Hawaiian substrate.

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.

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:

- Weak – friable (crumbles or breaks with handling or slight finger pressure);
- Moderate – friable (crumbles or breaks with considerable finger pressure);
- Strong – not friable (will not crumble or break with finger pressure).

Structure

This variable is most appropriate to the vertical extent observed in borings and sometimes to lateral extent observed in trenches. The 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;
- 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.

Other sample appearance descriptors include:

- 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).

Rock Classification

The purpose of rock classification is to thoroughly describe the physical and if possible, mineralogical characteristics of a rock sample collected through rotary sampling, or significant rock fragments encountered in a soil matrix drilled into by hollow stem auger, or in a trench, and to classify it according to a common system. Because rock classification systems vary, and to date there is no universally accepted rock system equivalent to the soil USCS, the HEER Office recommends a general rock classification system similar to the US Navy standard operational procedure developed for description of rock types; however, it is modified because the Navy system includes rock types not found in the state of Hawai'i ([US Navy, 2007](#)).

Rock descriptions preferably should be made by a trained geologist or geotechnical engineer. The items essential for classification include: Rock Name (e.g., coral limestone), Color (according to the Munsell code), Texture/Grain size (e.g. fine-grained, porphyritic), Structure (e.g., fractured, massive, porous), degree of weathering, and overall Classification according to the following general rock types:

- Conglomerate (CG) – Coarse-grained, consolidated sedimentary rock, including conglomerate and breccia.
- Sandstone (SS) – Consolidated sedimentary rock composed primarily of sand-sized particles.
- Mudstone (MS) – Consolidated sedimentary rock composed primarily of silt-sized or finer particles.
- Carbonates (LS) – Chemical or biological precipitates including coralline limestone, algal limestone, cemented shell limestone.



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- Basalt (IE) - Although it is conceivable that very deep borings may encounter intrusive igneous rock, the predominant igneous rock that will be encountered in Hawai'i is basalt. The description of basalt should include an identification of the encountered rock as predominantly a'a or pahoehoe. Descriptions of basalt should also have an indication of degree of weathering (if possible) and any identifiable dominant zones, depths, identifiable fracture orientations, clinker zones in a'a, or interconnected / elongated vesicles in either lava type. All of these may indicate preferential pathways for groundwater travel.
- Tuff (T) – Descriptions of tuff should include boring structure characteristics as described previously, degree of friability, and degree of weathering.

Where possible, rock types should also be identified according to depth range below ground surface. Descriptions of rock type should pay primary attention to characteristics that potentially affect groundwater behavior (e.g. basalt fracturing, carbonate porosity). An example rock description is as follows:

Tuff (T), dusky red, 2.5 YR 3/2, welded, horizontal layers (~0.5 inch) of sand-sized ash/rock fragments grading upwards to laminated fine grained ash, 5 to 6 feet bgs, no fracturing with upper laminations highly weathered and altering to clay.

Other Subsurface Boring Soil/Rock Information

Optional but desirable associated information to accompany the boring logs would be photographs of boring locations, and for deeper borings, photographs of recovered samples. Each photograph should have a unique qualifying identification number or code. This code and some of the pertinent boring/soil sample information indicated on the list above should be written down and included within the photograph. A common method to include the information is to write it on paper or a reusable dry-erase type of board and to place the paper or board within the view of the photograph along with a common object (e.g., pen) for scale.



M.2 EQUIPMENT PREPARATION/DECONTAMINATION

Decontaminate sampling devices used to collect samples prior to use and between DUs. This includes drill rods and coring used for the collection of subsurface increments and samples. Decontamination of sampling equipment during the collection of increments *within a DU* for preparation of a bulk Multi Increment sample is not necessary. This includes the collection of samples or subsamples for the same DU layer, when multiple DU layers and core increments are being sampled (e.g. subsurface borings). Decontamination of equipment *between DU replicates* samples is recommended, since replicates are intended to be completely independent.

Protect decontaminated equipment from incidental contact with potential contaminant sources by placing in sealed plastic bags or otherwise keeping the equipment well covered.

The following, triple-wash approach is recommended as a default procedure for decontamination of sampling equipment where trace levels of contaminants are being investigated (Figure M-5).

1. Removed caked soil and debris from sampling equipment by hand;
2. Wash with light detergent;
3. Rinse with tap-water;
4. Rinse a second time with tap-water.



Figure M-5. Triple Wash Decontamination of Sampling Equipment

The use of solvents to clean equipment should be avoided in order to minimize the generation of potential hazardous waste (see M.3 and [USEPA, 2015](#)). Document the decontamination procedure in the SAP and the final investigation report. These procedures may not be adequate for decontamination of equipment used to collect water samples (refer to [Section 6](#)). Carry multiple sets of sampling tools in order to expedite sample collection and allow decontamination of equipment in batches, ideally just once a day at the start or end of a sampling day.

Heavy equipment parts necessary for the advancement of any sampling device must be steam cleaned or high pressure/hot water washed between DU locations. Examples of these types of equipment include auger flights, drill rods, and backhoe buckets.

The collection of soil samples beneath concrete pads, floors, or asphalt paved areas may sometimes be necessary. If the equipment used to remove the concrete or asphalt has the potential to come into direct contact with the underlying soil, it must also be decontaminated. Decontaminate this equipment prior to and between sample locations in a manner similar to decontamination procedures discussed above for heavy equipment.

The collection and testing of equipment rinsate samples is not required or necessary for typical soil investigations. The practice is designed for "ultraclean" sampling approaches most typically associated with the collection of water samples, where parts-per-trillion level accuracy of laboratory data is desired. The



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collection of large Multi Increment soil (and sediment) samples also minimizes the potential for cross contamination of samples if small amounts of soil are inadvertently left on sampling tools, provided that the basic decontamination procedures described above are followed.

M.3 INVESTIGATION DERIVED WASTE

Investigation-derived waste (IDW) generated during the collection of environmental samples must be properly managed and disposed of following completion of the investigation. Typical types of IDW include (after [USEPA, 2014](#); see also [USEPA, 1991](#), [SERAS 1994](#)):

- Personal protective equipment (PPE, e.g. disposable coveralls, gloves, booties, respirator canisters, splash suits, etc.)
- Disposable sampling equipment and related items (e.g., plastic trowels, core samplers, broken or unused sample containers, sample container boxes, tape, etc.);
- Soil cuttings from drilling or hand augering;
- Drilling mud or water used for mud or water rotary drilling;
- Decontamination wash water, rags, towels, etc.;
- Spent solvents used in sample preparation (e.g., methanol preservation) or cleaning;
- Other non-hazardous waste (plastic ground cloths, packing and shipping materials, etc.).

An effort should be made to minimize the amount of IDW generated during a site investigation to the extent practicable.

It is the responsibility of the property owner and the party conducting the sampling to properly dispose of all waste generated in accordance with local, state and federal regulations. If IDW is designated for disposal to a landfill or any other off-site location then the generator must make a Hazardous Waste Determination under RCRA (Resource Conservation and Recovery Act) and in accordance with Hawai'i Administrative Rules (HAR) §11-262-11. Material that meets the regulatory classification as "hazardous waste" must be disposed of at a permitted, hazardous waste treatment, storage or disposal facility. There are currently no hazardous waste landfills in Hawai'i. Therefore, IDW classifiable as hazardous waste must be disposed of at a regulated facility on the mainland.

A hazardous waste determination is a step-by-step process. First determine if the waste is specifically exempted by HAR §11-261-4. Petroleum-contaminated soil and materials are also excluded from hazardous waste regulations and can be disposed of at a municipal landfill, provided that it does not contain other contaminants which could cause it to be classifiable as hazardous waste. Wastes that are not specifically excluded are further assessed as part of the hazardous waste determination as follows (HAR §11-261-2):



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- Listed Wastes: Specifically listed as a hazardous waste in [HAR §11-261-2](#) (F-listed waste)
- Testing - Testing the waste for toxicity, ignitability, corrosivity, or reactivity according to the methods set forth in subchapter C of HAR §11-261; and/or

Knowledge (e.g., known flammable solvent; see also Construction and Demolition Waste Disposal General Guidance ([HDOH, 2015](#) and updates).

Waste that meet criteria for classification of "hazardous" under these methods must be disposed of at a permitted facility. Categorization as a "listed" hazardous waste primarily applies to pure product (e.g., some pesticides) or process wastes (e.g. spent methanol and other solvent) and is not generally applicable to IDW. Hazardous waste regulations most commonly apply to excess soil that fails a leaching test criteria for disposal in a municipal landfill, referred to as the Toxicity Characteristics Leaching Procedure (TCLP). These materials must be managed as hazardous waste and disposed of accordingly at a permitted facility.

Soil, including borehole cuttings, that is not classifiable as hazardous waste can be placed on site or disposed of as follows:

Soil meets Tier 1 EALs for unrestricted land use (e.g., residential):

- No restrictions on reuse provided that DU volume is <100 yd³ (see [HDOH, 2017a](#)).

Soil fails Tier 1 EALs but meets commercial/industrial EALs and appropriate for current site use:

- Place within the area where the soil was collected (surface soil).
- Put back into the boring (subsurface cores);
- Place in an on-site disposal unit (any disposal unit exceeding one cubic yard should be discussed with the HDOH SHWB to evaluate if a permit is required);
- Transport to a HDOH-permitted off-site treatment/disposal facility.

Long-term management under an EHMP is required for soil that fails Tier 1 EALs for unrestricted reuse (or alternative, approved action levels) but is to be left on site ([Section 13](#); see also [HDOH, 2007](#)). Soil that fails Tier 1 EALs but meets commercial/industrial EALs should not be placed in otherwise clean areas of the site or taken offsite for reuse at another location.

For decontamination fluids:

- Pour onto ground in area where samples were collected to allow infiltration or evaporation;
- Transport to a HDOH-permitted off-site treatment/disposal facility.

Used disposable tools, PPE, waste rags, towels, packing material, ground cloths, etc., (maximum 100kg per site investigation in order to qualify for small quantity generator exemption; refer to [USEPA, 1991, 2014](#)).



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- Double bag and dispose of in an on-site trash container, at a waste collection center, or a municipal landfill.

Always check with the landfill operators to determine their acceptance and testing requirements (if applicable) for non-hazardous IDW materials being disposed. The generation of hazardous IDW should be minimized. Most routine investigations should not produce any hazardous IDW. The use of solvents for cleaning of equipment should be minimized ([USEPA, 2014](#)). Solvent-free cleaning procedures for routine cleaning and decontamination as described in Section should be referred to (see also [USEPA, 2015](#)). If the use of solvents is required, for example at sites impacted with tarry material, the volume should be minimized and mixing of waste solvent with detergent/wash water mixes avoided.

Management and disposal of waste groundwater generated during developing and purging activities is discussed in [Section 6](#) and summarized below. Development and purge water can be disposed of on the ground immediately downgradient of the well provided that it is generated from the uppermost groundwater unit, is not impacted above action levels applicable to the site, does not contain free product or exhibit a sheen, and is not allowed to runoff into a surface water body or storm drain (refer to [USEPA, 2014](#)). If these criteria cannot be met then the water must be disposed of at an offsite, regulated facility (e.g., municipal landfill or other treatment facility). Development and purge water should not be disposed in monitoring wells. Non-hazardous IDW such as drill cuttings, drilling mud, purge or development water, decontamination wash water, etc., should not be disposed of in dumpsters. [Note that guidance presented above replaces and supersedes guidance presented in the 2009 version of Section 6; scheduled for updates in 2017]

If knowledge of the contaminant or analytical testing determines the IDW falls under hazardous waste regulations then the material must either be (1) managed off-site at a permitted facility approved for the waste or (2) stored securely on-site in accordance with HAR §11-262-34, unless HAR §11-261-5 is applicable. Regulated hazardous waste left on-site must be handled in a fashion that does not pose an immediate threat to human health or the environment. The Solid and Hazardous Waste Branch (SHWB) should be contacted for concurrence with the manner of treatment or handling of IDW characterized as hazardous waste. The proximity of residents and workers in the surrounding area and site security must be considered before deciding to leave hazardous waste on site.

M.4 FIELD WORK COMPLETION

The field investigation team should restore the investigation site once soil sampling and associated field investigation is completed to as close to pre-investigation condition as possible. This includes, but is not limited to the following:

- Demobilization of all equipment (e.g. drill rigs);
- Removal of field-related structures (e.g. temporary field trailers);
- Proper management or disposal of IDW;
- Repair of structural changes made to the site as a result of investigation (e.g., patching or resurfacing of concrete/asphalt surfaces cut for borings).



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In particular, after any subsurface soil sampling is completed and if no other field investigation activity is to be conducted within a boring location (e.g., monitoring well installation, product removal) the borehole must be securely closed and sealed. If not properly closed and sealed, boreholes may otherwise act as a conduit for contamination. All procedures and materials for sealing boreholes should be outlined in the SAP for review prior to initiation of the field investigation. The procedures for closing and sealing boreholes recommended by the HEER Office follow those for abandoning and closing monitoring wells, as described in Section 6.9.

In some instances where follow-on activity at the site is planned but not yet initiated (e.g., subsequent soil removal) or if a potential exposure pathway or other hazard exists (e.g., unstable structure), retaining some structures such as temporary fencing or signage onsite is appropriate and should be implemented and documented in the site investigation report.

The HEER Office strongly recommends that site restoration as close as possible to pre-investigation conditions be documented in photographs, and the photographs be included as part of the site investigation report.



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N.1 INAPPROPRIATELY SIZED DUS

The designation of Decision Units (DUs) for site characterization is discussed in Section 3.3. It is important to ensure that DUs are appropriately sized to meet site investigation objectives. Decision Units should ultimately be sized to address potential environmental hazards posed by contaminants in soil at the site. This always includes direct exposure and depending on the contaminant can also include leaching, gross contamination and other concerns (see Appendix B).

Direct exposure concerns under current site conditions are most directly evaluated through the designation of Exposure Area DUs. As discussed below, however, separate characterization of known or suspected areas of heavier contamination within an exposure area is still recommended. Leaching, gross contamination and other concerns are most directly evaluated based on Source Area DUs. The latter requires a more detailed understanding of the locations of potential heavy contamination based on the site history, field observations, and interviews with people knowledgeable of the site and related information. Source Area DUs are commonly a few tens to a few hundreds of square meters in size and typically smaller than Exposure Area DUs that might be designated at the same site. The maximum size of a Source Area DU for characterization purposes is generally set to the maximum DU size likely to be acceptable for exposure areas. Multiple DUs might be required for characterization for very large source areas to assess both risk and remedial optimization concerns.

Failure to adequately identify and characterize suspect source areas at the beginning of an investigation can have several consequences. Foremost is the need to identify suspect source areas as a basic objective of an environmental investigation. If historical information or field observations suggest that contamination might be concentrated in a specific area of a site, then this area must be characterized separately from anticipated clean areas. The intentional inclusion of small areas of heavy contamination within large areas of otherwise clean soil for characterization can also cause the entire DU to fail and unnecessarily drive up cleanup costs.

Assume for example that an older building on a 500 m² lot is to be demolished and a new home constructed. The entire lot might be considered to represent a single, "Exposure Area" DU for evaluation of direct exposure risk. Soil around the perimeter of the existing house is, however, suspected to have been treated with Technical Chlordane (chlordane), widely used in the past as a termiticide. Exceptionally high concentrations of chlordane in this area could erroneously imply that the entire property is contaminated above soil action levels.

This highlights the need to characterize the house perimeter as a separate, Source Area DU, with the remaining area of the yard tested as an Exposure Area DU. The perimeter of the house will likely be flagged for potential direct exposure concerns. If the new house is to be constructed on the existing foundation then exposure to treated soil in this area can subsequently be minimized by placing gravel, landscaping or pavement around the perimeter.

Contamination associated with source areas can also extend below the depth of soil included in the original Exposure Area DU. This deeper soil could potentially be excavated during future redevelopment and spread



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out across the surface, resulting in a higher exposure area concentration of chlordane than estimated from the original investigation.

Significant disagreement between replicate samples can indicate the presence of a localized area of heavy contamination within an initially large DU. If this occurs and the resulting data are inadequate for decision making (refer to Appendix L), then the original DU should be subdivided into smaller DUs for re-characterization. This situation can be avoided for contaminants known to be subject to potential exceptionally high small-scale variability (e.g., lead shot, PCBs, etc.) by designating reasonably small DUs up front and increasing the number and/or mass of increments collected within a DU.

The use of inappropriately small DUs can also interfere with an efficient site investigation. Decision unit sizes are guided by the need to address risk and optimize remedial efforts. While a strong resolution of contaminated versus clean areas is desirable, the use of excessively small DUs to characterize an area is generally not beneficial and unnecessarily adds to the cost of the investigation.

N.2 DATA GAPS BETWEEN SURFACE DUS AND SUBSURFACE DU LAYERS

Traditional discrete sampling methods require extrapolation of contaminant concentrations between individual sample points, where data are not available. As discussed in the Hawaii field study of discrete sample variability, extrapolation between discrete data points can be highly unreliable (see Brewer et al. 2017a,b). Under Decision Unit-Multi Increment Sample (DU-MI)S investigation approach, the data generated represent the mean contaminant concentration for a designated area rather than a single point. The use of adjoining DUs and subsurface DU layers minimizes gaps in data obtained for a site. This helps avoid the need for additional characterization should contamination be found as well as help optimize remedial actions. Data gaps for precise delineation of the lateral or vertical extent of a source area might be acceptable under some circumstances but should be reviewed and discussed on a site-by-site basis.

Boundary DUs surrounding suspect source areas of heavy contamination should ideally be placed immediately adjacent to the Source Area DU, with no gaps of untested soil present (see Section 3.3.3). Multiple rings of DUs might be advantageous in case inner DUs unexpectedly fail action levels. If gaps are unavoidable, for example due to buildings or other access limitations between source areas and anticipated clean areas, then contamination in the untested area of soil should be assumed to be similar to that identified for the primary source area unless additional information suggests otherwise.

The same need to minimize data gaps holds true for subsurface soil. Traditional discrete sampling of subsurface cores involved testing of soil at widely spaced intervals at depth below the ground surface (e.g., every 5 feet). Contamination was typically assumed to extend halfway between points where concentrations above and below action levels were reported. Under a DU-MIS investigation approach the entire depth of soil targeted for collection of a Multi Increment (MI) sample is divided into separate but adjoining, DU layers for representative sampling and characterization. Extrapolation across data gaps is not necessary or desirable.

N.3 INADEQUATE NUMBER OF INCREMENTS AND BULK SAMPLE MASS

Sampling theory requires that a sample of adequate mass be collected from an adequate number of points within a targeted DU to capture and represent distributional heterogeneity within the DU and to estimate a



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reliable mean (refer to Appendix D).

Recall that the number of increments collected and the representativeness of the sampling methodology used is, in theory, independent of the size of the DU (refer to Section 3.6.2). The number of increments might vary somewhat based on the form of the contaminant (e.g., more for lead nuggets or PCB droplets) or other suspicions about the degree of contaminant heterogeneity but increasing increments in such cases would apply to both small and larger DUs as well. The number of increments might vary somewhat based on the form of the contaminant (e.g., more for lead nuggets or PCB droplets) or other suspicions about the degree of contaminant heterogeneity but increasing increments in such cases would apply to both small and larger DUs as well.

A minimum of 30 to 75+ increments per DU is recommended, with a default of 50 for sites where the nature of contamination is uncertain (refer to Section 3.6.2). If the target contaminant does not show an unusual degree of heterogeneity in the DU soil, then approximately 30-50 increments are typically adequate to determine a representative mean concentration (determined by the collection and analysis of field replicate samples). For contaminants or situations where there is a relatively high degree of contaminant heterogeneity in the DU, larger numbers of increment (and/or larger masses for increments) are typically needed to obtain representative mean values. The adequacy of the number and mass of increments included is tested through the collection of replicate samples (refer to Appendix L).

An adequate mass and number of increments to obtain a representative sample is required for both surface soil as well as subsurface soil, discussed below. If a less-than-recommended number of increments can be collected from a targeted DU, especially in the case of subsurface soil, then field replicate data is crucial to help evaluate the usefulness of the data for decision-making. In general, using fewer increments than recommended increases the likelihood that the data might not prove to be adequately representative. Any limitations of the data identified should be discussed in the investigation report, as well as the potential need for more reliable characterization in the future.

Some sampling guidance documents and training classes have suggested that increments initially collected from a DU be combined into smaller "sampling unit" subsets for separate testing to provide a better understanding of contaminant distribution variability within the DU. For example, a DU might be divided into four subareas with 8 increments collected from each "SU" and combined and tested separately. This approach suffers from several shortcomings. Most importantly, DUs should be appropriately sized to the desired scale of decision making at the start of the investigation. If better resolution might be needed for an initially large DU then the DU should simply be subdivided into smaller DUs with an MI sample of adequate mass and number of increments collected from each DU.

Testing of poor-quality samples from DUs when a proper number of increments could have been collected is wasteful of investigation resources and should be avoided. The resulting data cannot be assumed to be representative of the area where the combined increments were collected (see Brewer et al. 2017a,b). From a field perspective, the added time and cost to collect an adequate number of increments (e.g., 30 to 75+) from each smaller area is also negligible, especially given the importance of the resulting data in decision making.

Collecting an adequate mass of soil (e.g., 1 to 3 kg) is usually feasible for a project, as is the collection of an



adequate number of increments from exposed, surface soil. The collection of a large number of increments from subsurface soil DU layers might not be practical, however, due to cost or access issues (see Section 3.6.2 and Appendix G). If this is the case, then limitations on the reliability of data should be clearly discussed in the investigation report. Replicate data from at least 10% of the DUs are especially important in such cases (refer to Appendix L).

N.4 IMPROPER INCREMENT SPACING

Improper spacing of sample increments is a common mistake in DU-MIS investigations. Sample data are most reproducible when increment spaced equally apart in all directions, referred to as "systematic random." This applies to both the both the "x" and "y" directions laterally and, in the case of subsurface borings, in the "z" direction (Figure N-1; refer to Section 3.6.2). This approach helps to ensure that the distributional heterogeneity of a contaminant within the DU is reliably captured and represented by the sample collected (refer to Appendix D).

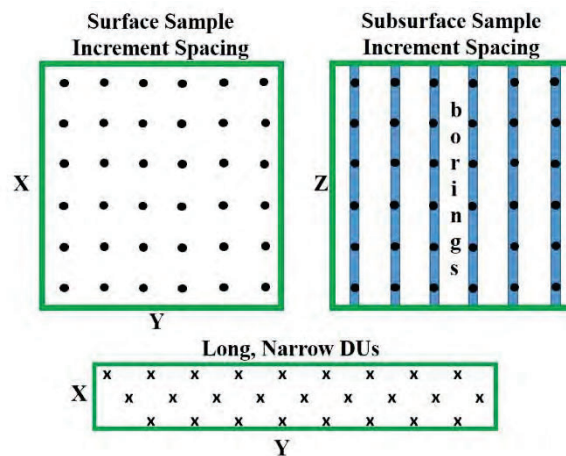


Figure N-1. Proper lateral and vertical systematic random spacing of MI sample increments (dots represent increment collection points).

Examples of less reliable increment spacing methods are depicted in Figure N-2. Simple random (Figure N-2a) and stratified random (Figure N-2b) strategies can under or over represent localized areas of elevated contamination and are not reliable for characterization of soil, sediment and other types of "infinite element" particulate media (refer to Appendix D).



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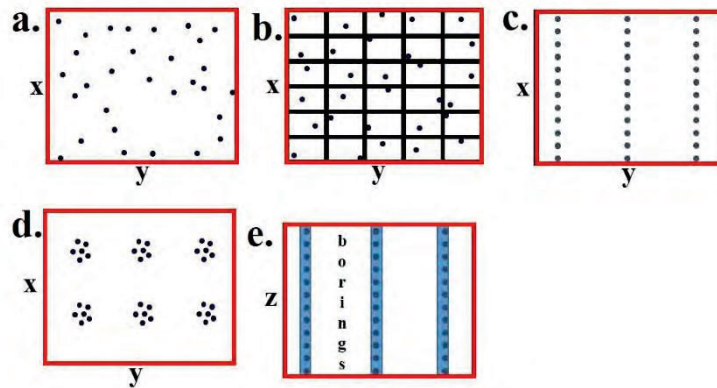


Figure N-2. Examples of poor increment spacing strategies: a) Simple random, b) Stratified random and c) Closely spaced increments from widely spaced rows, d) Tight clusters of increments from widely spaced pits and e) tightly spaced increments from widely spaced borings.

As a shortcut in the field, it can also be tempting to collect a large number of closely spaced increments from a few widely spaced lines (Figure N-2c) or single spots or pits (Figure N-2d) within a DU (examples c and d). These strategies will not provide an adequate coverage of the DU area and are especially prone to under estimation of the mean contaminant concentration for the DU as a whole.

The same potential for error holds true for the collection of closely spaced increments from widely spaced borings installed to collect samples from subsurface DUs (Figure N-2e). The vertical distance between increments collected within a single borehole should be approximately equal to the distance between the boreholes themselves. Since the thickness of DUs tends to be substantially less than the lateral length and width, the entire core extracted from a boring will in most cases represent a single increment (refer to Appendix G, Section G.3).

The only difference in comparison to the collection of increments from surface soils is that much larger sampling tubes (e.g., via a direct-push rig) are normally used to collect core increments from subsurface DU layers. The individual increments are normally too large for combination as a single sample. A subsample of each core increment must instead be prepared, for example by collection of 10, 5-gram, evenly spaced plugs of soil from a targeted DU layer interval. The plugs are subsamples of the core increment and do not represent individual increments themselves.

None of the increment spacing strategies depicted in Figure N-2 will produce reliable sample data and should be avoided. Poor increment spacing can cause replicate samples to fail and require re-characterization of the DU, wasting resources and unnecessarily extending the time and cost required to complete the project. Unreliable data can also pose future liability issues for the property owner.



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N.5 IMPROPER INCREMENT SHAPE

Gardening trowels are easy to use and decontaminate in the field for the collection of soil samples. Such tools are prone to collect wedge-shaped increments, however. This can bias the subsequent MI sample to the upper portion of the targeted DU layer, where the greater mass of soil was collected, and call into question the representativeness of the data in terms of the site investigation objectives. Note that this bias would not necessarily be reflected in replicates samples collected from the same DU, since the same error is carried forward in each individual sample.

Trowels should be avoided when tools that allow the collection of more core-shaped increments can be utilized (e.g., sampling tubes). A core-shaped increment is ideal since it equally represents the targeted DU layer in both the vertical and lateral direction (refer to Section 3.6.2.3 and Appendix F). The use of trowels and/or other tools might be unavoidable for hard-packed or gravely soils, however (see Appendix F). If this is the case, then an effort should be made to collect cylindrical-shaped increments that are equally representative of the full thickness of the DU. This approach might also be required for dry, loose soils that would otherwise fall out of sampling tubes or not be evenly extracted with drills or other coring equipment. Non-coring sampling alternatives might result in the collection of larger individual increment masses and larger bulk MI sample. This needs to be considered when planning the investigation and coordinating with the laboratory.

N.6 MISUSE OF CO-LOCATED DISCRETE SAMPLES AND INCREMENT SPLITS

Field studies indicate that contaminant concentrations within a single sample or increment and co-located samples or increments can vary by orders of magnitude in an unpredictable and random manner (see Brewer et al. 2017a,b). The concentration of the contaminant in a simple subdivision of the discrete sample or increment (sometimes referred to as a split) or otherwise co-located sample/increment could well have no bearing on the concentration of the contaminant in the increment collected from the same location. Attempting to combine small groups of co-located increments into bulk MI sample for testing similarly poses the same risk of non-representativeness as described above.

Note also that replicate samples should not be collected from the same (or co-located with) initial increment locations (see Appendix L). While technically a separate sample, the precision of the MI sample data for a specific DU is accurately assessed by the collection of replicate samples from widely separated and completely independent locations.

N.7 INADEQUATE LABORATORY PROCESSING

Inadequate processing of an MI sample negates the field representativeness of the sample and the validity of the resulting data. The resulting data reported by the laboratory can be considered to be no more useful than a single discrete sample collected from within the DU area.

It is important to ensure that the laboratory that receives the MI sample has a written standard procedure in place to properly process and collect a subsample for testing (refer to Appendix K). For non-volatile contaminants this includes drying, sieving and subsampling in accordance with sampling theory methodologies. Request a copy of the laboratory's Standard Operating Procedure (SOP) for incremental



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sample processing and testing. Ideally the lab should be visited and the procedures used to manage MI samples demonstrated.

N.8 INADEQUATE SUBSAMPLE MASS FOR ANALYSIS

The mass of soil collected in the field and extracted for analysis by a laboratory is dictated by sampling theory and must address both Fundamental Error associated with inherent, compositional and distributional heterogeneity and error in the physical collection of a representative subsample (see Appendix D). A minimum subsample mass for analysis of 10 to 30 grams is recommended for soil samples sieved to the <2 mm particle size (see Appendix K). When possible, a larger subsample mass is preferable to help further reduce the potential lab subsampling error and improve the precision of laboratory subsample replicates. Grinding (milling) of samples to a smaller particle size can allow for collection of a smaller lab subsample where appropriate for the contaminant or specified in a standard lab method (see Appendix K). Such cases should be discussed with the laboratory and the overseeing regulatory agency during sample investigation planning.

Standard laboratory methods for testing metals in soil only require one gram or less to meet analytical needs. The same is true for per- and per-and polyfluoroalkyl substances (PFASs). Unless the bulk sample has been ground, however, this is inadequate to ensure that the resulting data will be representative of the sample collected. The need to extract a larger mass of soil for metals analysis should be clarified with the laboratory prior to the initialization of field work.

Extraction of a larger subsample mass and/or grinding of the sample might be required if laboratory replicate samples indicate poor subsampling precision (see Appendix L). This should be discussed with the laboratory prior to submittal of the samples and procedures for retesting of samples included in the investigation work plan and instructions to the laboratory.

N.9 LACK OF FIELD REPLICATE SAMPLE DATA

The need to collect replicate data might seem redundant with experience gained for a specific contaminant or a geographical area (see Appendix L). For example, 30-increment MI samples have been routinely demonstrated to generate reproducible data for are normally adequate to test for pesticides applied to agriculture fields or for soil contaminated by wastewater (refer to Section 3.6.2 and Appendix D). The representativeness of a DU sample can only be evaluated and documented if replicate samples are collected, however.

Routine collection of field replicates is required to demonstrate that correct sampling procedures were utilized (e.g., number of increments, systematic random sample spacing, correct increment shape and adequate sample mass, field handling/processing procedures, etc.).

The precision of MI sample data can decrease as the mean concentration of a contaminant increases. Unanticipated areas of localized contamination within DUs can also lead to decreased precision of normally acceptable MI samples. Field studies indicate that the concentration of a contaminant can vary by an order of magnitude or more in replicate samples collected from the same DU, even when an MI sample consists of greater than 50 increments (Brewer et al. 2017a,b). Under some circumstances even the higher recommended default of 75 increments per sample could be inadequate to demonstrate a representative mean contaminant



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concentration in a DU, such as when contaminants are distributed in a very heterogenic "nugget" form (e.g., lead pellets, or lead paint chips).

Testing of large numbers of discrete samples from a DU, for example with a portable XRF, can provide a semi-quantitative indication of the degree of small-scale variability within the DU and provide an indication of the relative number of increments necessary to collect a representative MI sample (e.g., greater number of increments needed for increasing heterogeneity). Statistical methods used to estimate the number of discrete samples needed to estimate the mean concentration of a contaminant within a DU (USEPA 2013) are not, however, directly translatable to the number of increments required under an MI investigation and cannot be used as a substitute for the collection of replicate samples. This is due to multiple factors, including consistency in the manner in which the individual discrete samples were collected (e.g., shape, mass, etc.) and perhaps more importantly the mass of soil represented by each sample data point in comparison to the mass of soil typically represented by a single increment.

N.10 REVERSION TO DISCRETE SAMPLING

Perhaps the most egregious error in site investigations is a reversion to discrete sampling due to real or perceived difficulties for the collection of proper MI sample in the field (refer to Appendix E). This is especially common for characterization of subsurface soil (see Appendix G). Sampling theory and the use of DU-MIS to characterize soil is not simply one alternative to past discrete sampling methods, it is a much needed replacement.

The concept of "DUs" was an inherent part of early, discrete soil sample investigation guidance (see Appendix C and Section 3.3). Discrete soil sample collection points were typically designated based on a desire to characterize contamination in one area versus another. As discussed below, the area intended to be represented by a single, discrete sample point (or cluster of sample points) is designated as a separate DU for characterization. A large-mass MI sample is then collected from multiple (e.g., 30- 75+) locations within this area rather than reliance on a small, discrete soil sample collected from a single location. The number of DUs designated for a particular investigation not coincidentally corresponds with the number of discrete soil samples or clusters of samples that might have been collected under past approaches.

The unreliability and inefficiency of discrete sample data remains the same regardless of the nature and location of the targeted soil. Consideration of sampling theory is still required to ensure that the resulting data are technically defensible and useful for decision making purposes. The fact that a targeted layer of soil is covered by additional soil that must first be penetrated for the collection of an MI sample cannot be used as a reason to revert to discrete sample collection approaches.

Targeted DU areas and layers, rather than single horizons, must always be designated as part of a site investigation regardless of the manner used to characterize the soil. As is the case for surface soil samples, subsurface samples must be of adequate mass and distribution within the DU to address fundamental error. Samples must also be processed at the laboratory in accordance with MI subsampling methods. If an ideal number of increments cannot be included in a DU layer sample due to access or cost limitations, then limitations regarding the reliability of the resulting data must be assessed and discussed based on a review of the replicate sample data. Identification of data limitations is also important where single borings are used for



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decision making purposes (see Appendix G).

Another error sometimes encountered in site investigations is a reversion to the collection of a single discrete sample when the targeted DU is very small, for example $<10 \text{ m}^2$ or even $<1 \text{ m}^2$. Sampling theory is independent of DU area and volume (refer to Appendix C). A minimum, 1 to 3 kg sample must still be collected from the DU to address fundamental error. If collection of the recommended default number of increments from the DU is somehow not practical, then this should be noted and replicates collected and reviewed to determine precision of the sampling data. Any limitations identified through analysis of the replicate data should be discussed when reporting the results. The sample must be processed and subsampled for testing at the laboratory in accordance with MI sampling methods.

If the DU is so small that the entire volume of soil is to be collected and submitted to the laboratory, then processing and subsampling in accordance with MI sampling methods are still required (e.g., testing of sediment in a small sump). In this sense the soil submitted is not a true "sample" in terms of sampling theory, since the entire DU volume of interest is collected for analysis. The use of MI sampling methods to collect a representative sample from the DU in the field was not necessary. Any error in the resulting data would be fully attributable to laboratory subsampling and analysis errors since the entire mass is not being analyzed and a laboratory subsample must be collected.

Similar concerns and requirements as noted above also apply to the characterization of sediment that happens to be covered by a layer of water. Simplistic contouring between discrete sample points cannot be assumed to be reliable beyond the gross recognition of large contaminant patterns. DU layers, rather than single horizons should be designated and targeted for characterization (see Appendix G). Increments collected within a DU must be of adequate shape, number and mass to address fundamental error and generate a representative sample. It is possible that fewer numbers of increments might be adequate to collect a representative sample of sediment from designated DU areas, due to the nature in which the contaminant was released and the sediment deposited. This issue has not been evaluated in detail in the field to our knowledge, however. Limitations on the reliability of resulting data when an adequate number of increments cannot be collected must be discussed in the investigation report.



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The investigation, cleanup, verification and disposal of soil contaminated with polychlorinated biphenyls (PCBs) is regulated under 40 CFR § 761.61 (PCB remediation waste) of the Toxic Substances Control Act (TSCA; USEPA, 1998h). The Hawai'i State Contingency Plan also authorizes HDOH to require the investigation and remediation of PCB-contaminated properties (refer to Section 2). This joint authority has caused problems as USEPA lags behind HDOH in the transition to multi increment sampling methods from outdated discrete sampling methods prescribed in 40 CFR 761.61(a) *self-implementing on-site cleanup and disposal of PCB remediation waste* and associated guidance documents (e.g., USEPA, 1985, 1986). Discrete sample data are not allowed for final decision making at sites overseen by HDOH (refer to Appendix E). Error and uncertainty in discrete sample data are reviewed in a field study published by Brewer et al. (2017a,b).

Use of alternative procedures is provided for in 40 CFR 761.61(c)(1) *risk-based disposal approval*, subject to the approval of the USEPA Regional Administrator:

Any person wishing to sample, cleanup, or *dispose* of PCB remediation waste in a manner other than prescribed in paragraphs (a) or (b) of this section ... must apply in writing to the EPA Regional Administrator in the Region.

Responsible parties are encouraged to contact the TSCA office of USEPA Region IX when concentrations of PCBs in soil greater than 50 mg/kg are reported for MI samples. Under TSCA, soil with a concentration of >50 mg/kg PCBs must be disposed of at a hazardous waste landfill in the mainland US. Workplans for DU-MIS investigations at such PCB sites must be approved on a case-by-case basis by both HDOH and USEPA Region IX.

Of particular concern under TSCA is the need to minimize "dilution" of heavily contaminated soil with soil from surrounding, clean areas in sample data. Doing so might cause a conflict with Section 761.1(b)(5) of TSCA regulations, which states "No person may avoid any provision specifying a PCB concentration by diluting the PCBs, unless otherwise provided." This concern can be avoided by designation of well-thought-out and researched Spill Area DUs at known or suspected PCB release sites in accordance with this guidance document and in coordination with HDOH. If PCB concentrations >50 mg/kg are identified in any DU then USEPA Region IX may also request to review and approve DUs designated for characterization of the site.

Dilution, as described under TSCA, can occur when samples intended to represent distinctly different areas (i.e., DUs) of a site are intentionally combined for a single analysis. The use of "*composite*" samples is also limited under TSCA regulations and guidance (e.g., USEPA, 1985, 1986). As interpreted by HDOH, a Multi Increment sample is not a composite sample in the sense used in TSCA. A sample becomes a "composite" when soil from what should otherwise be separate DUs is combined. Under TSCA, each individual discrete sample is assumed to potentially represent an individual, PCB "contaminated zone" or "sampling area," referred to in this guidance as "Spill Area DU" (see Section 3.3.2)(USEPA, 1985):

The PCB level is assumed to be uniform within (a contamination zone/spill area) and zero outside it.

The spacing of individual discrete samples was based in part on the anticipated size of a spill area in order to ensure that at least one sample was collected from each potential area (USEPA, 1987):



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The decision maker must determine... the acceptable probability of not finding an existing contaminated zone in the suspected area. For instance, it might be determined that a 20 percent chance of missing a 100ft-by-100ft (10,000ft²) contaminated zone is acceptable but only a 5 percent chance of missing a 200ft-by-200ft (40,000ft²) zone is acceptable.

Under this scenario, TSCA regulations and associated guidance allow soil from multiple DU areas to be combined or "composited" into a single sample for analysis in order to reduce the total cost of laboratory analysis (Figure O-1; USEPA, 1985, 1987, 1998h). This in effect allowed intentional "dilution" of suspect spill areas with surrounding areas of cleaner soil that should otherwise be separately characterized. The resulting data therefore had to be divided by the number of samples included in the composite, however, in order to ensure that no single "sampling area" exceeded the target cleanup level. A maximum of ten discrete samples was permitted to be included in a single composite, based on a target cleanup level of 10 mg/kg and a laboratory detection level of 1 mg/kg. Note that risk assessment guidance was still under preparation at the time that TSCA guidance and regulations were being prepared and the concept of "exposure areas" and risk were still not widely understood.

Under a more up-to-date, DU-MIS investigation, "compositing" in the sense initially intended under TSCA guidance would involve the intentional combination of Multi Increment samples collected from separate DUs into a single sample for testing. (Figure O-2) The resulting data would again need to be divided by the number of DUs and MI samples included in the composite, however, in order to ensure that no single DU area might exceed the target cleanup level.

Although this would save on analytical cost, *compositing of MI samples is not allowed* under HDOH guidance. An independent MI sample, representing what in the past might have been a single discrete sample, must instead be collected from each DU and individually tested for comparison against target action or cleanup levels. Intentional inclusion of suspect spill areas with anticipated clean areas for characterization as a single DU could be interpreted to violate the "anti-dilution" clause in TSCA regulations. For these reasons it is important to closely coordinate DU designation at PCB-release sites with HDOH and, as necessary, with USEPA Region IX.

As noted earlier, the intentional mixing of known or anticipated contaminated areas (i.e., "Spill Areas") with clean areas as part of a site investigation is poor practice. Doing so risks unnecessarily increasing the area and volume of soil requiring removal or long-term management. Relatively small DUs, usually a few hundred to a few thousand square feet, should be designated for characterization within suspect spill areas (refer to Section 3.3.2). Perimeter DUs of a similar area and volume should be designated in anticipated clean areas around suspect spill areas. The maximum size of DUs in outer, anticipated clean areas should be limited to the size of current or anticipated exposure areas (default residential exposure area 5,000 ft²; see Section 3.3.1). These approaches will help ensure that the investigation and cleanup PCB-contaminated soil is carried out in an efficient and effective manner.



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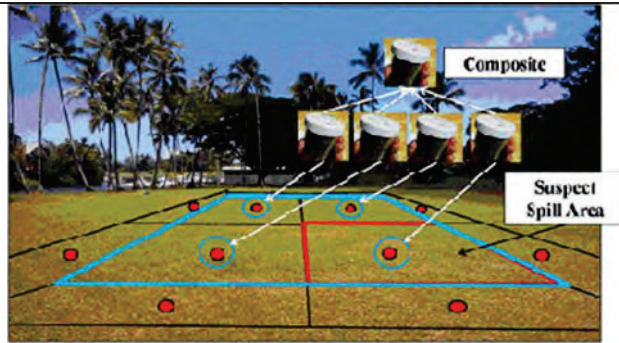


Figure O-1. Limited “Compositing” and “Dilution” Allowed Under TSCA to Reduce Laboratory Costs. Soil combined across separate “sample areas” or “contaminated zones,” referred to in HDOH guidance as “Decision Units (DUs)” represents a composite sample. This can lead to a potential *dilution* of a higher PCB concentration in otherwise separate “hot spots,” referred to as “Spill Area DUs” by HDOH. Under TSCA the laboratory result must be divided by the number of discrete samples, or more specifically otherwise separate areas represented by the composite sample for comparison to the screening level. This ensures that no single area, i.e., DU, exceeds the target screening level.

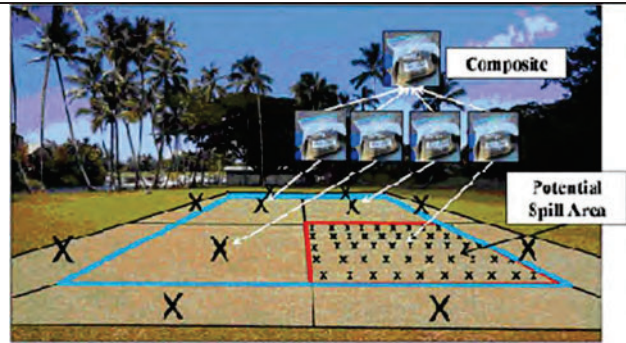


Figure O-2. Theoretical Compositing of Multi Increment samples. Multi Increment samples from separate DUs combined into a single sample for processing and testing at the laboratory. The laboratory data are divided by the number of samples (DUs) included in the composite sample for comparison to screening levels. Note that a single MI sample collected within a single DU *is not a composite*. **Compositing of MI samples is not allowed under HDOH site investigation guidance.** Refer to Section 3 of HDOH Technical Guidance Manual for information on designation of Decision Units at contaminated properties.



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Guidance for Soil Stockpile Characterization and Evaluation of Imported and Exported Fill Material

October 2017

**State of Hawai'i Department of Health,
Hazard Evaluation and Emergency Response Office
Honolulu, Hawai'i**

NOTE: This guidance document will be updated periodically, as needed. Please send any comments or suggestions for edits or improvements to Roger Brewer at roger.brewer@doh.hawaii.gov in the Honolulu HEER Office, or to John Peard at randall.peard@doh.hawaii.gov in the Hilo HEER Office.

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Guidance for Stockpile Characterization and Evaluation of Imported and Exported Fill Material

This document provides guidance on the import and export of fill material at chemical contaminant removal or remediation sites that are overseen by the Hawai'i Department of Health (HDOH) Hazard Evaluation & Emergency Response Office (HEER Office). However, this guidance is also useful for consideration at general construction projects not under HEER Office oversight when imported fill materials may be used, or where export of fill material is proposed. This guidance may be particularly appropriate for consideration at sites where “sensitive” populations such as children, the infirmed or the elderly reside, or will reside, and could have exposure to imported soils - for example at schools, daycare centers, community gardens, parks, and homes.

Included in this guidance is the HEER Office's definition of “acceptable fill material”, an overview of the fill material determination process, sources of fill that should be considered suspect for contamination, and other fill material management considerations. Guidance for the characterization of fill material or soil stockpiles is provided as an update and expansion of [Section 4.2.8](#) of the Hazard Evaluation and Emergency Response (HEER) Office *Technical Guidance Manual (TGM) – Collection of Multi Increment* Samples for Stockpiles*. This guidance does not apply to projects involving fill materials that will be placed in State of Hawai'i waters (as defined by the Clean Water Act in Title 40 U.S. Code of Federal Regulations Part 232 [40 CFR Part 232]), and does not preclude compliance with any other laws or regulations.

* *Multi Increment*® is a registered trademark of EnviroStat, Inc.

1.0 Potential Hazards Related to Fill Material

Fill material that is imported to or exported from sites where significant environmental contamination has been identified, or where cleanup projects are underway, could pose multiple environmental hazards if not appropriately characterized and managed. The import of fill material from a source that has not been evaluated could inadvertently re-contaminate a remediated property, and may be considered illegal dumping. The inadvertent export of contaminated soil or sediments for use as fill material at another property could move human health or ecological risks from one place to another. Contaminated fill material can also pose direct- exposure hazards to workers installing or repairing subsurface utilities.

The construction industry generally characterizes imported or exported fill material with respect to specific geotechnical requirements (e.g., suitability for structural support), but may not include an evaluation of potential environmental hazards. Although importing and exporting fill material is a common practice in the redevelopment process, users may be unaware if contaminated fill material is brought to or removed from their property. Understanding the source of the fill material and the potential for contamination is very important. Laboratory testing is recommended for suspect fill material prior to import or export. Outreach and education efforts are an important element to

ensuring property owners and developers understand the potential hazards related to imported or exported fill material.

2.0 Definition of Acceptable Fill Material

Imported or exported fill material could include a variety of materials, including soils, dredged sediments, and construction and demolition debris (e.g., bricks, concrete, etc.). Under typical scenarios for properties where the HEER Office provides oversight, clean or “acceptable fill material” is defined as:

A) Natural materials consisting of soil, clay, sand, volcanic cinder and ash, and rock; or a mixture or combination of such materials, which are:

- Excavated from a quarry, borrow pit or earthen bank; dredged sediment, or from sources such as agricultural settling ponds; and either
 1. Not suspected to contain hazardous substances above applicable HEER Office Tier I Environmental Action Levels (EALs) based on the historical use of the fill source area (i.e., as documented by an environmental due diligence review). Includes consideration of chemical contaminants of concern for the site, including past legal use of pesticides; data on natural background chemical concentrations in the area may also be considered, though typically the HEER Office Tier I EALs are above natural background levels.

Or

2. Not known to have concentrations of chemical contaminants of concern above applicable HDOH Tier I EALs or appropriate alternative action levels approved by the HEER Office. Chemical concentrations are determined through laboratory testing of representative field samples. Refer to the HEER Office *Evaluation of Environmental Hazards at Sites with Contaminated Soil and Groundwater* and EAL Surfer Excel File (HDOH 2016a) for further details on HDOH Tier I EALs. Refer to the HEER Office TGM [Sections 3](#), [4](#), and [5](#) on strategies and methods for collecting field samples (HDOH 2016b).

B) Construction materials or demolition material exclusive of soil that:

- Are known or tested to be free of paints, coatings, grouts/mortar, or adhering residues containing regulated quantities of hazardous substances such as lead, organochlorine termiticides, or asbestos.
- And meet the definition of “inert fill” under the Solid Waste Pollution statutes (HRS 342H-1) overseen by the HDOH Solid and Hazardous Waste Branch (SHWB). In accordance with HRS 342H-1, inert fill generally means earth, soil, rocks, rock-like materials such as cured asphalt, brick, and clean concrete less than eight inches in

diameter with no steel reinforcing rod. The fill material shall not contain vegetation or organic material or other solid waste. Soil (earth) must meet Tier 1 EAL criteria noted in “A” above for natural materials.

- Except, asphalt is not considered acceptable fill (and should not be used as fill material) on chemical removal or remediation sites overseen by the HDOH HEER Office unless otherwise approved by that office.

Note that lead-based paint, defined as >5,000 mg/kg lead (USEPA 2008), must be removed from asphalt prior to recycling for use as fill material. Lead-based paint striping does not, however, require removal for milled asphalt that is to be reprocessed as asphalt for pavement.

Acceptable fill material should not:

- Be considered a regulated hazardous waste, as determined in a site-specific, hazardous waste designation as described below;
- Be subject to other regulatory requirements for chemicals such as, but not limited to, lead and asbestos abatement requirements;
- Contain mobile, free liquids based on visual inspection;
- Create public nuisances (e.g., odors) to users or at adjacent properties;
- Include a significant amount of construction material or demolition debris other than the
- (uncontaminated) materials noted in the definition of acceptable fill material above, and
- Include street sweepings, asphalt paving, incinerator ash, or similar residential, commercial, or industrial wastes. Using these materials as fill material is not recommended due to the potential variability of their composition, the potential for contamination, and the associated difficulty in accurate sampling and testing.

Figure 1 presents a flow chart of the hazardous waste determination process for soil that is exported or imported to properties overseen by the HEER Office. If the soil is designated for disposal to a landfill or reuse at another off-site location, then the generator must make a hazardous waste determination in accordance with the Hawai‘i Administrative Rules (HAR) §11-261-2. Making a hazardous waste determination is a step-by-step process. This begins with determining whether the soil meets the definition of a waste and, if so, meets criteria for classification as hazardous waste.

A “waste” is defined under HRS § 342-H as follows:

“‘Waste’ means sewage, industrial and agricultural matter, and all other liquid, gaseous, or solid substance, including radioactive substance, whether treated or not, which may pollute or tend to pollute the atmosphere, lands or waters of this State.”

A “hazardous waste” is defined under HRS § 342-J as follows:

“‘Hazardous waste’ means a solid waste, or combination of solid waste, which because of its

quantity, concentration, or physical, chemical, or infectious characteristics may: (1) Cause or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitating illness; or (2) Pose a substantial existing or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.”

Determining whether a waste is hazardous under RCRA (Resource Conservation and Recovery Act) can be done through one of the following methods:

- Knowledge – see Construction and Demolition Waste Disposal General Guidance (HDOH 2011); and/or
- Testing – Testing the waste according to the methods set forth in subpart C of HAR 11-261.

Soil impacted by chemicals at concentrations equal to or below the HDOH Tier 1 Environmental Action Levels (EALs) for unrestricted land use (HDOH 2016a) is considered “Inert fill material” for the purposes of a hazardous waste determination. This can be used as “generator’s knowledge” to exclude the need for additional testing (e.g., TCLP) provided that samples were collected in accordance with the HEER Technical Guidance Manual (HDOH 2016b) and guidance provided in this document.

Soil impacted by chemicals above HDOH Tier 1 Environmental Action Levels (EALs) for unrestricted land use (i.e., residential use; HDOH 2016a) is considered to be “polluted” and therefore meets the definition of a “waste” under HRS § 342-H. Toxicity Characteristic Leaching Procedure (TCLP) tests should be carried out on soil that exceeds Tier 1 EALs and is proposed for offsite disposal or reuse as part of the hazardous waste determination process in accordance with HAR §11-261-24. If concentrations meet or exceed TCLP levels and the soil is designated for offsite disposal or reuse, then the soil is a hazardous waste and must be managed in accordance with HAR §11-261.

Consideration of soil that exceeds Tier 1 action levels for unrestricted land use but meets the HDOH action levels for commercial or industrial land use (see Appendix 1, Table I-2 in HDOH 2016a) for offsite reuse at such sites must be approved by the HEER Office in consultation with the SHWB. This should include preparation of a site-specific, Environmental Hazard Evaluation (EHE) in accordance with Section 13 of the HEER TGM as well as a site-specific Environmental Hazard Management Plan (EHMP) prepared in accordance with Section 18 of the HEER TGM (2016b). The EHMP must present institutional controls for long-term tracking and management of the soil. Synthetic Precipitation Leaching Procedure (SPLP) is required as part of the EHE if Tier 1 action levels for potential leaching concerns are exceeded, in accordance with HDOH (2016c).

A hazardous waste determination must be carried out in accordance with HAR §11-261-24 for soil that exceeds Tier 1 action levels for unrestricted land and is proposed for offsite reuse. This must include TCLP test data if the concentration of the subject chemical in soil in milligrams per kilogram equals or exceeds twenty-times the promulgated TCLP level in milligrams per liter (Table 1). This represents the minimum mass of the subject chemical that must be present in the soil in order for the TCLP level to be potentially reached, assuming 100% extraction of the chemical from the soil during the TCLP leaching procedure. Yellow highlighting indicates chemicals with Tier 1 Soil EALs that exceed

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twenty times the TCLP level (adjusted to mg/kg) but otherwise do not pose a significant risk to human health and the environment at the concentrations noted. TCLP data *are not required* for onsite or offsite reuse of soils that meet the Tier 1 EALs provided that characterization of the soil was carried out in accordance with the HEER Office *Technical Guidance Manual*.

Comparison of soil data to TCLP limits *is not* part of the EHE process. As indicated in Table 1, soil that meets TCLP limit could still pose significant risk to human health and the environment outside of a regulated, landfill environment. Individual counties might have additional requirements regarding the import or export of fill material. Contact the respective counties regarding fill material use or fill material export issues prior to movement of the material.

Figure 1. Hazardous waste determination process for exported or imported soil.

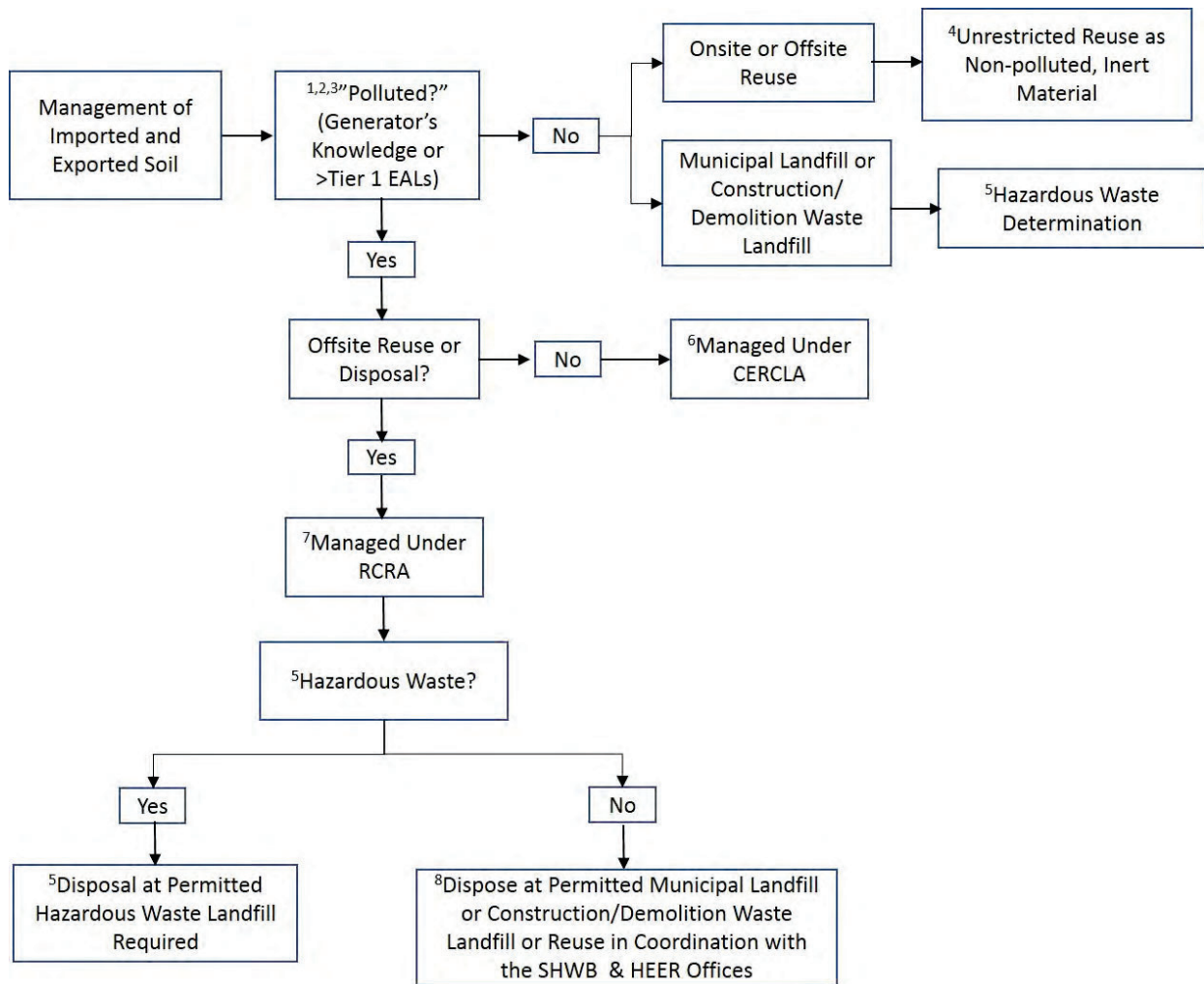


Figure 1 notes:

1. Imported or exported soil initially defined as a potential “waste” under HRS §342H-1 (Solid Waste Pollution). “Waste” defined as a “substance ... which may pollute the atmosphere, lands or waters or Hawaii.”
2. “Polluted” or “contaminated” soil defined as a soil with one or more potentially hazardous substances at a concentration that exceed HDOH Tier 1 EALs for unrestricted land use (HDOH 2016a; Tier 1 EALs for soil within 150m of a surface water body and situated over groundwater that is a source or potential source of drinking water).
3. Soil should be characterized in accordance with Decision Unit and Multi Increment Sample investigation methods described in the HEER *Technical Guidance Manual* (www.hawaiidoh.org) if testing is required due to insufficient generator knowledge of contamination potential.
4. “Inert Waste” includes “earth... which will not cause a leachate of environmental concern” (HAR §11-58.1, Solid Waste Management) *and* meets HDOH Tier 1 EALs for unrestricted land use.
5. Hazardous Waste Determination must include testing for Toxicity Characteristic Leaching Procedure if concentration of contaminant in soil (mg/kg) exceeds HDOH Tier 1 EALs for unrestricted land use AND is equal to or greater than 20 times the TCLP level (mg/L) for that chemical. TCLP data are not required as part of a hazardous waste determination if the concentration of the contaminant in soil is less than 20 times the TCLP level under any scenario. Soil cannot be disposed of at a municipal landfill or construction/demolition waste landfill if determined to be a hazardous waste under HAR §11-261 (Hazardous Waste Management). The soil must either be managed onsite under 128D through the HEER Office or disposed of at a permitted, hazardous waste landfill under the oversight of the SHWB.
6. Soil managed on-site under HRS §128-D (Environmental Response Law).
7. Soil managed for offsite reuse or disposal under HAR §11-261 (Environmental Response Law).
8. Offsite reuse of soil from a HEER project site that fails Tier 1 EALs for unrestricted land use but meets action levels for commercial/industrial land use *and* is not a hazardous waste must be carried out in coordination with the HEER Office and the Solid Waste Section of the SHWB. Land use restrictions and preparation of an Environmental Hazard Management for long-term management of the soil will be required under most circumstances.

Table 1. Comparison of Tier 1 Soil EALs with “20X TCLP” minimum concentration of chemical in soil necessary to require TCLP test data prior to disposal of soil in a municipal or construction/demolition waste landfill.

USEPA Hazardous Waste Number	Contaminant	CAS No. 2	¹ Regulatory Level (mg/L)	² 20X Equivalent in Soil (mg/kg)	³ HDOH Tier 1 Soil EAL (mg/kg)
D004	Arsenic	7440-38 -2	5.0	100	23
D005	Barium	7440-39 -3	100.0	2,000	1000
D018	Benzene	71 -43 -2	0.5	10	0.30
D006	Cadmium	7440-43 -9	1.0	20	14
D019	Carbon tetrachloride	56 -23 -5	0.5	10	0.10
D020	Chlordane	57 -74 -9	0.03	0.6	17
D021	Chlorobenzene	108-90 -7	100.0	2,000	1.5
D022	Chloroform	67 -66 -3	6.0	120	0.026
D007	Chromium	7440-47 -3	5.0	100	1000
D023	o -Cresol	95 -48 -7	200	4,000	-
D024	m -Cresol	108-39 -4	200	4,000	-
D025	p -Cresol	106-44 -5	200	4,000	-
D026	Cresol		200	4,000	-
D016	2,4-D	94 -75 -7	10.0	200	0.34
D027	1,4-Dichlorobenzene	106-46 -7	7.5	150	0.055
D028	1,2-Dichloroethane	107-06 -2	0.5	10	0.023
D029	1,1-Dichloroethylene	75 -35 -4	0.7	14	1.1
D030	2,4-Dinitrotoluene	121-14 -2	0.13	2.6	0.024
D012	Endrin	72 -20 -8	0.02	0.4	3.8
D031	Heptachlor (and its epoxide)	76 -44 -8	0.008	0.16	0.071
D032	Hexachlorobenzene	118-74 -1	0.13	2.6	0.22
D033	Hexachlorobutadiene	87 -68 -3	0.5	10	0.041
D034	Hexachloroethane	67 -72 -1	3.0	60	0.023
D008	Lead	7439-92 -1	5.0	100	200
D013	Lindane	58 -89 -9	0.4	8.0	0.029
D009	Mercury	7439-97 -6	0.2	4.0	4.7
D014	Methoxychlor	72 -43 -5	10.0	200	16
D035	Methyl ethyl ketone	78 -93 -3	200.0	4,000	6.2
D036	Nitrobenzene	98 -95 -3	2.0	40	0.0053
D037	Pentachlorophenol	87 -86 -5	100.0	2,000	0.098
D038	Pyridine	110-86 -1	5.0	100	-
D010	Selenium	7782-49 -2	1.0	20	78
D011	Silver	7440-22 -4	5.0	100	78
D039	Tetrachloroethylene	127-18 -4	0.7	14	0.098
D015	Toxaphene	8001-35 -2	0.5	10	0.49
D040	Trichloroethylene	79 -01 -6	0.5	10	0.089
D041	2,4,5-Trichlorophenol	95 -95 -4	400.0	8,000	0.50
D042	2,4,6-Trichlorophenol	88 -06 -2	2.0	40	0.31
D017	2,4,5-TP (Silvex)	93 -72 -1	1.0	20	0.87
D043	Vinyl chloride	75 -01 -4	0.2	4.0	0.036

Table 1 notes.

1. Promulgated TCLP level for determination of soil as a hazardous waste. If the result of a TCLP test meets or exceeds the level noted for the subject chemical, then the soil is classified as a “hazardous waste” and cannot be disposed of in a municipal landfill or construction/demolition waste landfill.
2. Minimum concentration of the subject chemical that must be present in the soil (mg/kg) in order for the TCLP level (mg/L) to be potentially reached, assuming 100% extraction of the chemical from the soil during the TCLP leaching procedure. TCLP data are required for disposal of the soil at a municipal landfill or construction/demolition waste landfill if the concentration of the chemical in soil exceeds HDOH Tier 1 EALs for unrestricted land use AND is equal to or greater than twenty-times the TCLP level noted in the Table 1. TCLP data are not required for onsite or offsite reuse of soils that meet the Tier 1 EALs provided that characterization of the soil was carried out in accordance with the HEER Office *Technical Guidance Manual*.
3. HDOH Tier 1 Soil Environmental Action Level for unrestricted land use, including residential, schools, medical facilities, parks, etc., where children and other sensitive populations might be present on a regular basis.

3.0 Fill Determination Process

The purpose of the fill determination process is to determine if proposed fill material meets the HEER Office definition of acceptable fill material. Determination of the presence or absence of contamination above action levels in proposed fill material will help ensure that using the fill material will not adversely impact human health or the environment. Options to complete the fill determination process include:

Option 1 – An environmental due diligence review of the fill source property that concludes there is no evidence of past releases that could pose an environmental hazard(s) (as described in HDOH 2016a) or evidence of any other Recognized Environmental Condition (REC) (as defined in ASTM 2005) that suggests the proposed fill material could contain chemical contaminants above applicable HDOH Tier I EALs. This includes consideration of past legal use of pesticides. See Section 3.1.

Note: Obtaining fill material from a quarry that documents their fill material is acceptable based on an environmental due diligence review of their fill source property and the considerations noted in Option 1 would be a suitable determination for those using the fill. A copy of the quarry's environmental due diligence report should be available for reference and documentation, and it is important to verify with the quarry that the area from which the fill material was obtained is included in environmental due diligence report.

Option 2 – A fill material characterization report that summarizes representative analytical data for the proposed fill material from the fill source operator, fill importer, or fill exporter. See [Section 3.2](#).

3.1 Environmental Due Diligence Review

This fill determination option involves conducting an environmental due diligence evaluation of the fill source area or property. One method to accomplish this is to conduct a Phase I Environmental Site Assessment (ESA) of the fill source area or property in accordance with ASTM Standard Practice E 1527-05 (ASTM 2005) and the U.S. EPA's *Final Rule on Standards for Conducting All Appropriate Inquiry* (AAI) (USEPA 2005). If the findings of the Phase I ESA indicate that there is no evidence of a significant release of a hazardous material at the fill source property (including petroleum products), then the material can be managed as acceptable fill material. If requested, the Phase I ESA report for the fill source property should be provided to the HEER Office for inclusion in the site file, otherwise citation to the Phase I ESA indicating no evidence of a chemical release should be included in reports. Preparation and submittal of a formal, Phase I ESA should be considered for sites where a significant amount of fill material is to be imported and spread over a large area that will remain exposed after development (e.g., large residential redevelopment). A formal Phase I ESA is generally not necessary for the import of small volumes of fill material from known source areas, especially if past evaluations of the fill source property are available to document that the fill material is not suspect for contamination. Final documentation judged appropriate should be incorporated into the Removal or Remedial Action report for the site for review by the HEER Office and inclusion as part of the public

record.

If the findings of an environmental due diligence evaluation suggest a potential that chemical contaminants are present above environmental action levels (e.g., in excess of HDOH Tier I EALs for unrestricted land use), then representative sampling and analytical testing of the fill material should be conducted.

3.2 Fill Material Characterization

This fill determination option involves representative sampling and analysis of the proposed fill material and preparation of a fill material characterization report. A qualified environmental consultant contracted by the fill material provider, importer, or exporter should carry out testing and analysis. Preparing a fill material characterization report facilitates the review process by the HEER Office. Information that should be provided in the fill material characterization report includes:

Intended use of the fill material and land use/zoning or planned future land use at the site where it will be utilized;

- Quantity of fill material to be imported, exported, or relocated on-site;
- Description of the fill material's original nature (i.e., undisturbed native condition) including the source property address, tax map key (TMK) number, and owner contact information;
- Fill material source property historic usage (i.e., industrial, residential, agricultural, etc.), and citation to Phase I ESA report, if applicable;
- Previous fill material use(s) when the material is other than undisturbed native material;
- Summary of sampling methodology and analytical results from the sampling of the fill material, including:
 1. Identification of decision units (DUs) (e.g., horizontal and vertical dimensions);
 2. Number of DUs per volume of fill material;
 3. Number of sampling increments in DUs;
 4. Number and location of replicate samples;
 5. Summary of laboratory analytical results and copy of laboratory data reports;
 6. Chain of custody documentation; and
 7. Any additional information that may be necessary to assess the fill material contamination status.
- Evaluation of sample data with respect to potential environmental hazards (e.g., comparison to HDOH Tier I EALs using the HDOH EAL Surfer Excel File (HDOH 2016a)); and
- Identity/signature by party responsible for evaluation of each source of fill material.

Some of the information for the fill material characterization report may be available from a Phase I ESA or the laboratory analytical data reports from any previous investigation of the proposed fill material source.

As discussed in Section 5 of this document, the effort necessary to characterize a fill source is dependent on a number of site-specific factors. For example, the proposed use of comingled, existing stockpiles of unknown origin will require a more detailed investigation than proposed fill material from a single, known source (e.g., fill material from a former agricultural field). Proposed fill material that could be contaminated by highly mobile, volatile or leachable contaminants will require a more detailed sampling and characterization (due to vapor intrusion and groundwater protection concerns) than proposed fill material where targeted contaminants are limited to low-mobility chemicals (e.g., Polychlorinated biphenyls (PCB), dioxins, arsenic, lead, etc.).

Exceptions to the need for a fill material characterization report, as noted above, should be discussed with the HEER Office on a case-by-case basis. Citation to the environmental due diligence review, alternative documentation (i.e., brief overview of the fill source and potential for contamination), or a copy of the fill material characterization report should be included in the final Removal or Remedial Action report for the site (see [Sections 14](#) and [16](#) of the HEER Office TGM).

4.0 Suspect Fill Material Sources

Certain property and land uses are at a higher risk for the possible presence of contaminated soil (Table 2). Fill material originating from these areas should be considered “suspect” and will generally require site-specific, representative sample data to make an acceptable fill determination.

**Table 2 – Suspect
Fill Sources**

Commercial & Residential Sites	Industrial Sites	Agricultural & Other Sites
<ul style="list-style-type: none"> • Fuel stations • Automotive repair or maintenance shops • Junkyards or recycling facilities • Dry cleaners • Photographic processing facilities • Painting facilities • Sites where hazardous materials or hazardous wastes were used, stored, or generated • Sites where environmental cleanup activities have not achieved HEER Office Tier 1 EALs for unrestricted use • Rail lines • Former building sites where buildings were painted with lead-based paints, or were treated with persistent termiticides 	<ul style="list-style-type: none"> • Landfills or disposal facilities • Metal processing plants • Bulk petroleum facilities or oil refineries • Waste treatment plants • Wood treatment facilities • Manufacturing facilities • Sites where hazardous materials or hazardous wastes were used, stored, or generated • Sites where environmental cleanup activities have not achieved HEER Office Tier 1 EALs for unrestricted use • Rail lines • Former building sites where buildings were painted with lead-based paints, or were treated with persistent termiticides 	<ul style="list-style-type: none"> • Agricultural fields (current or former) • Pesticide storage or mixing areas • Pesticide container disposal areas • Seed dipping areas • Settling ponds • Bagasse piles • Former plantation housing areas • Rail lines • Area with existing fill • Dredged sediments from heavily developed areas (e.g., canals, harbors, etc.) • Military sites

Former agricultural fields are a common potential source of fill material in Hawai'i (e.g., former sugarcane and pineapple lands). For example, refer to map of estimated lands in sugarcane production in the HEER Office Fact Sheet *Arsenic in Hawaiian Soils: Questions and Answers on Health Concerns* (HDOH 2010a). The past use of pesticides on agricultural lands makes these areas suspect for potential contamination. [Sections 3](#) and [4](#) of the HEER Office TGM discuss approaches for the investigation of former field areas. [Section 9](#) of the HEER Office TGM provides an overview of past pesticide use in Hawai'i and includes guidance on the selection of contaminants of potential concern (COPC) for former sugarcane and pineapple lands.

As discussed below, proposed fill material suspected of contamination by volatile or highly leachable chemicals requires a more detailed and expensive evaluation before use as fill material. Using fill material that could include small but heavily contaminated pockets of volatile or highly leachable chemicals is strongly discouraged (e.g. greater than or equal to 20 cubic yards [yd³] in volume). A summary of volatile and highly leachable chemicals listed in the current HEER Office Environmental Action Levels lookup tables is included as [Appendix 1](#) to this document.

5.0 Fill Material Sampling Strategies and Methods

Scenarios where sampling proposed fill material is recommended include:

- Fill source where the findings of a Phase I ESA indicate that there is evidence or likelihood of a significant release of a hazardous material (i.e., could result in contamination above applicable action levels),
- Fill source where background information is unavailable, or
- Fill source where some chemical sampling data is available, but data is not representative for the material to be used, or does not include all contaminants of concern for the site.

Representative sampling must be conducted to ensure appropriate decision-making for use as fill material. Refer to the relevant sections of the HEER Office TGM for detailed guidance on designation of DUs ([Section 3](#), as well as the collection and evaluation of Multi Increment (MI) soil samples ([Section 4](#)). A DU is a targeted area and volume of soil from which samples are to be collected and decisions made based on the resulting data. A MI sample is collected within each DU and analyzed to estimate the representative (i.e., mean) concentration of each targeted contaminant. The collection of discrete soil samples is usually discouraged. Alternative sampling approaches should be discussed with the HEER Office on a case-by-case basis.

5.1 Decision Unit Designation and Characterization

The level of effort necessary to characterize a fill source is dependent on a number of factors, including:

- Anticipated homogeneity or heterogeneity of large-scale contaminant distribution (e.g., potential presence of spill areas greater than 20 to 100 yd³);

- Anticipated mobility of targeted contaminants and associated, potential environmental hazards;
- Intended use of the fill material (e.g., residential versus commercial or industrial property);
- Size of receiving area and anticipated average depth of fill material; and
- Size and depth of the source area and the volume of fill material to be exported.

A site-specific sampling strategy could involve single or multiple DUs to generate representative data.

To avoid contamination of previously remediated sites or sites not known to be contaminated, the HEER Office strongly recommends that all sampling activities of proposed fill material be completed prior to delivery at the receiving site. It is important to include the time required to collect, analyze, and evaluate data for proposed fill material in the initial project budget and schedule.

5.1.1 Designation of Decision Unit Volume at the Fill Source Based on the Receiving Area

One approach for testing fill material before it is delivered to a receiving site is to designate “exposure area” DUs at the receiving site, estimate the volume of fill material to be placed in each DU, and then test a similar volume of soil at the source area. This approach is generally applicable only to fill sources where the suspect COPCs have been identified as “low mobility” contaminants, and not for fill sources where volatile or highly leachable COPCs are suspect (see Appendix 1).

For example, assume that a one-acre commercial/industrial site is subdivided into two, approximately 20,000 square feet (ft²) “exposure area” DUs. The average thickness of fill material to be placed at the site is two feet. Each DU will therefore contain approximately 1,500 yd³ of soil. An equal DU volume of soil can then be designated at the fill material source area, whether it is an *in-situ* or stockpiled source. Whatever the volume selected under this approach, remember that representative sampling of that volume of fill is required, so the entire DU volume (at the fill source) must be accessible for possible increment collection, and multiple increments will need to be collected throughout the entire depth or height of the DU.

This approach is likely to be more efficient and cost-effective at sites where more than six-inches of fill material are to be placed, as assumed in the source-area DU designation approaches described below. Potential disadvantages are 1) using a larger DU associated with certain land use categories may not allow subsequent use or reuse for a land use category with a smaller DU recommendation without conducting additional sampling, and 2) reuse of the fill material at future sites, where the initial level of testing was not adequate to clear the soil if spread in a thinner layer over a broader area (e.g., six inches). Consultants should use their professional judgment based on the initial test results and knowledge of the source area to determine if these are potentially significant issues.

5.1.2 Source Area Characterization of In-situ Soil

[Sections 3](#) and [4](#) of the HEER Office TGM provide guidance on the characterization of *in-situ* soil. In many cases, material that is intended to be excavated and used for fill material will be most efficiently sampled *in-situ*. Excavated and stockpiled fill material can be more difficult to access for representative

sampling unless a large amount of space is available to store and flatten large stockpiles. Excavated soil that is subsequently determined to be contaminated may require additional assessment, remediation, or containment.

As discussed in [Section 3](#) of the HEER Office TGM, known or suspect spill areas should be individually investigated as separate DUs. This includes but is not limited to:

- Former pesticide storage and mixing areas;
- Soil around the perimeter of buildings potentially contaminated with lead-based paint;
- Soil around or under buildings suspected to be contaminated with persistent insecticides (e.g., organochlorine termiticides); and
- Obvious or suspected spill areas associated with underground storage tanks (USTs), aboveground storage tanks (ASTs), pipelines, PCB-containing transformers, and other commercial or industrial operations.

Dividing the fill source area into Exposure Area DUs is appropriate for sites where localized spill areas are not anticipated and the soil is not suspected to be contaminated with volatile or highly leachable chemicals.

Proposed fill source areas that are not suspected to include localized spill areas should be divided into Exposure Area DUs, as described in [Section 3](#) of the TGM (i.e., primary environmental hazard is direct-exposure to soil). A summary of recommended, default DU areas, DU volumes, and sampling depth for the *in-situ* characterization of proposed fill material source areas is provided in Table 3. Fill sources that are flagged for possible contamination concerns but are not suspected to include localized spill areas should be sampled and characterized at a DU size of 5,000 ft² for unrestricted use. This is the default residential home exposure area, to a depth of 6 inches below ground surface.

A DU area of 20,000 ft² (approximately one-half acre) is acceptable to characterize a fill source area for use in large, high-density residential redevelopments or schools. Larger DU sizes may be acceptable for source areas that are to be used only for commercial or industrial fill material. Recommended DU numbers in Table 3 include a minimum of 18 DUs (rather than 15 DUs) to achieve a minimum 60% level of confidence that 95% of the entire site is “clean” at the scale of these large-sized DUs (see also Table 6). While potentially acceptable for some sites and land uses, characterizing a fill material source area at DU sizes larger than recommended for unrestricted use of the fill material can limit future use of the property where the fill material is placed. Characterization of fill material source areas should be discussed with the HEER Office on a case-by-case basis to help ensure appropriate objectives will be met.

Depending on the depth and volume of fill material to be excavated, *in-situ* sampling may need to be done in successive lifts or at incremental depths to allow access for representative sampling. Borings, trenches, or test pits can be used to access and characterize deeper soils as necessary, depending on the nature of the site and the proposed soil removal depth. For borings, the entire core from a targeted depth interval is the DU layer “increment” for that boring. Sending the full increment

to the lab for subsampling and analysis may be impractical for long cores. As an alternative, the targeted interval of a core can be subsampled by collecting a representative core-wedge sample or MI sample (e.g., using a small core sub-sampling device, refer to [Section 5](#) of the HEER Office TGM). This approach will reduce the overall mass of the samples collected. It is recommended that the HEER Office be consulted when designing a subsurface sampling strategy for characterization of DU layers of varying thickness and depth.

When soil is going to be moved off-site for disposal or proposed reuse prompting the need for a hazardous waste determination under Hazardous Waste rules (HAR 11-262-11), *ex-situ* sampling of the soil (e.g., from excavated stockpiles) is generally preferred over *in-situ* sampling, to ensure the sampling is representative of the specific material designated to be moved off-site.

Table 3 – Default DU Area for *In Situ* Characterization of Proposed Fill Material Source Areas

[Assumes Only Low-Mobility Contaminants Present, and Absence of Known Spill Areas or Pockets of Volatile or Highly Leachable Contaminants]

Receiving Site Land Use Category	¹ Recommended DU Area/Volume/Depth	Comments
Unrestricted Use ²	5,000 ft ² /100 yd ³ /6 in.	Default DU area for unrestricted land use.
Schools and High-Density Residential Developments ²	20,000 ft ² /400 yd ³ /6 in.	Based on an assumed exposure area of approximately 0.5 acre.
Commercial or Industrial use only (formerly developed fill source) ^{2,3}	20,000 ft ² /400 yd ³ /6 in.	Based on an assumed exposure area of approximately 0.5 acre.
Commercial or Industrial use only ³ (agricultural field fill source) ²	Minimum 18 DUs/soil volume will vary/6 in.	Proposed source area divided into a minimum of 18 DUs for characterization of fill material.
Notes: DU Decision Unit ft ² square feet 1. Using DU sizes larger than recommended for unrestricted fill source areas may require retesting of property where fill material is placed if proposed for more sensitive land use in the future (e.g., residential). 2. Larger volumes may be acceptable on a case-by-case basis. DU volumes up to 400 yd ³ acceptable for unrestricted reuse on site-by-site basis if prior knowledge and a thorough Phase I indicates low potential for contamination above Tier 1 EALs. Collect triplicate MI samples in 10% of DUs (minimum one set). 3. Multiple vertical depths may need to be sampled, depending on volume of fill material being characterized. Refer to Section 5.1.1 for the option of basing the DU volume of the fill source on the planned use of fill at the receiving site.		

5.1.3 Source Area Characterization of Stockpiled Fill Material

A general approach for the investigation of stockpiles is summarized in [Table 4](#). Multiple factors need to be considered when developing a sampling strategy for stockpiled soil being considered for potential fill material, including but not limited to:

- Specific composition or type of fill materials in the stockpile;

- Number of source areas associated with the stockpile;
- Historical use of the fill source property or properties, if known;
- COPCs and associated environmental hazards;
- Existing fill material analytical data, if available;
- Planned use of the fill materials;
- Volume of fill to be imported or exported; and
- Scheduling of sampling activities.

Stockpiles of proposed fill material from different source properties with the potential for different types or degrees of contamination should be characterized separately. This will help avoid the need to re-segregate and characterize otherwise large volumes of acceptable fill material due to the inclusion of a relatively small volume of heavily contaminated soil. Similarly, stockpiles or significant portions of stockpiles (i.e., greater than 20 yd³ in volume) that are suspected to contain pockets of heavy contamination (“spill areas”) should be isolated and characterized separately. Proposed fill material from small but heavily contaminated stockpiles should not be deliberately mixed with “clean” or less contaminated stockpiles to dilute overall contaminant concentrations.

The approach described assumes that all fill material originating from a single fill source property will be used for the same purpose at the receiving site. If the fill material will be used for multiple purposes, it may be necessary to form individual stockpiles segregated by use. The HEER Office should be consulted prior to sampling for sites where fill will be used for multiple purposes.

Table 4 – General Approach for Sampling Stockpiled Fill Material

Steps/Activities
1. Segregate stockpiles of proposed fill material from different fill source properties.
2. Segregate volumes of proposed fill material from “spill areas.”
3. Select appropriate DU volume(s) based on proposed land use and contaminants of concern.
4. Choose a sampling strategy and tools that will provide access to sampling points throughout each DU.
5. Collect triplicate Multi Increment samples in 10 percent of DUs (minimum one set).
6. Consult with HEER Office if proposed fill material from a single fill source property will be used for multiple purposes at the receiving site to determine if alternative sampling strategies need to be implemented.
7. Consider the specific timing of the sampling activities – sampling during stockpile formation is preferred to sampling after stockpile formation.

5.1.3.1 Stockpile Decision Unit Designation

[Table 5](#) summarizes the DU volume recommended for characterization of fill material in stockpiles. Decision units for stockpiles should generally be designated in terms of volume, rather than area. The appropriate DU volume for a stockpile is based on a number of factors, including:

- Targeted contaminants and associated environmental hazards;
- Proposed use of fill material at receiving site (e.g., residential versus commercial or industrial property, etc.); and
- Total volume of fill material to be characterized.

Appendix 1 categorizes chemicals listed in the HEER Office Environmental Hazard Evaluation (EHE) and Environmental Action Limit (EAL) guidance (HDOH 2016a) in terms of volatility and leachability. As discussed below, these characteristics are used to flag chemicals that may pose significant vapor intrusion or leaching hazards that could require a more detailed characterization of the proposed fill material.

Table 5 – Summary of Default Stockpile DU Volumes Based on Targeted Contaminants of Concern

Targeted Contaminants of Concern ¹	Receiving Site Land Use Category	¹ Default Stockpile Decision Unit Volume	Example COPCs ²	Associated Environmental Hazards
Volatile Compounds	Any	20 yd ³	TPHg, TPHd, BTEX, naphthalene, PCE, TCE, mercury	Potential vapor intrusion hazards
Highly Leachable, Non-Volatile Contaminants	Any	20 yd ³	Triazines (e.g., atrazine), chlorinated herbicides, perchlorate, explosives	Potential leaching and surface runoff or groundwater contamination hazards
Low Mobility Contaminants ^{2,3,4,5}	Unrestricted Use	100 yd ³	PCBs, dioxins, arsenic, lead, PAHs, Technical Chlordane, DDT	Primarily pose direct exposure hazards
	Schools and High-Density Residential Developments	400 yd ³		
	Commercial or Industrial use only (formerly developed fill source)	400 yd ³		
	Commercial or Industrial use only (agricultural field fill source)	Minimum 18 DUs		
	Beaches (replenishment projects)	800 yd ³		
<p>Notes:</p> <p>COPCs contaminants of potential concern</p> <p>BTEX benzene, toluene, ethylbenzene, and xylenes</p> <p>PAHs polycyclic aromatic hydrocarbons</p> <p>PCBs polychlorinated biphenyls</p> <p>PCE perchloroethylene</p> <p>TCE trichloroethylene</p> <p>TPHg total petroleum hydrocarbons as gasoline</p> <p>TPHd total petroleum hydrocarbons as diesel</p> <p>yd³ cubic yards</p> <p>1 See text for description of contaminant categories, and Appendix 1 for a list of chemicals in these categories. DU volume recommended for volatile or highly leachable chemicals applies to remediated sites known to be contaminated above Tier 1 EALs and subsequently remediated (vs general site screening).</p> <p>2 Collect triplicate MI samples in 10% of DUs (minimum one set).</p> <p>3 Include SPLP batch tests for metals if Tier 1 EALs exceeded (HDOH 2016c).</p> <p>4 Larger volumes may be acceptable on a case-by-case basis. DU volumes up to 400 yd³ acceptable for unrestricted reuse on site-by-site basis if prior knowledge and a thorough Phase I indicates low potential for contamination above Tier 1 EALs. Using DU sizes larger than accepted for unrestricted fill source areas may require retesting of property where fill material is placed if property is proposed for more sensitive land use in the future (e.g., residential).</p> <p>5 Using soil with potential pockets of low volatility and relatively immobile heavy oil as fill material not recommended due to gross contamination concerns (see also HDOH HEER Office, 2016a).</p>				

5.1.3.2 Stockpiled Fill Material Potentially Contaminated with Volatile Organic Compounds

A chemical is considered to be "volatile" if its Henry's Law constant is greater than 0.00001 atm m³/mole and molecular weight is less than 200 (HDOH 2016a; refer to Table H in Appendix 1). Consideration of fill material from sites previously known to be contaminated with volatile compounds is not recommended, due to the high cost of testing and potential vapor intrusion hazards for nearby or future buildings if residual contamination is inadvertently missed. This includes gasoline and diesel fuels or chlorinated solvents (e.g., perchloroethylene [PCE], trichloroethylene [TCE], etc.). Mercury should be considered a volatile chemical, although volatility can decrease over time for releases to soil. Volatile contaminants also pose leaching and groundwater contamination hazards. Due to these concerns, characterization of stockpiles possibly contaminated with volatile organic compounds (VOCs) typically requires relatively small DU volumes.

If using the soil for fill material is still desired, then the HEER Office recommends a sample frequency of one DU per 20 yd³. For reference, this DU volume equates to approximately 6 inches of fill material under a default 1,000 ft² building floor – the default building size in vapor intrusion models (HDOH 2016a). Individual increments should be collected using a VOC-specialized sampling device (e.g., Core N' One, Terra Core, Encore, etc.) and extruded into a container with a premeasured volume of preservative such as methanol. A minimum of a 1:1 ratio of sample preservative to sample media is recommended. "In-field preservation" of the increments is preferred to minimize loss of VOCs. Alternatively, the individual increments (stored in the VOC-specialized sampling device) can be frozen and submitted to the laboratory for combination into a Multi Increment sample. Refer to [Section 4.2.7](#) of the HEER Office TGM (HDOH 2016b) for additional guidance on multi-increment sampling for VOCs. Note that this recommended DU volume does not apply for general screening of soil otherwise not anticipated to be contaminated with VOCs or highly leachable chemicals (see below) as part of a due diligence investigation.

Petroleum-contaminated soil poses potential gross contamination concerns (e.g., buildup of explosive gases, general odor and aesthetic concerns, etc.), as well as leaching and vapor intrusion hazards. Using petroleum-contaminated soil as fill material is not recommended. The analytical costs of sampling the proposed fill material for lighter weight fuels (e.g., gasoline and diesel fuels) and chlorinated solvents may also be cost prohibitive. Although heavier petroleum oils are not considered significantly volatile or leachable, the potential for gross contamination concerns generally negates using soil that has potential pockets of heavy oil contamination from being used as fill material. Refer to HEER Office guidance for long-term management of petroleum-contaminated soil for additional information (HDOH 2007; see also Section 18 in HDOH 2016b). Incidental leaks and minor soil contamination associated with normal operations of equipment are generally not significant enough to trigger petroleum and other chemicals as COPCs (e.g., small leaks of oil from heavy equipment in a quarry).

5.1.3.3 Stockpiled Fill Material Potentially Contaminated with Highly Leachable, Nonvolatile Contaminants

For this guidance, a chemical is assumed to be highly leachable if the sorption coefficient (k_{oc}) is less than or equal to $1,000 \text{ cm}^3/\text{g}$ (HDOH 2016a). This reflects a default K_d model value of 1.0 assuming a total organic carbon content in the soil of 0.1% (refer to Table H in Appendix 1). Consideration of fill material from sites that were known to be contaminated with highly leachable, non-volatile contaminants is not recommended (e.g., excess soil from former pesticide mixing areas or munitions disposal areas). As is the case for soils contaminated with volatile chemicals, the added analytical costs of sampling needed to clear the soil for use as fill material is likely to exceed the cost of the fill material itself.

Common COPCs that are considered highly leachable include (see also [Appendix 1](#); HDOH 2016a):

- Triazine herbicides (e.g. ametryn, atrazine, and simazine);
- Organophosphate pesticides;
- Chlorinated herbicides (e.g. 2,4-D and 2,4,5-T, dalapon);
- 1,4 Dioxane;
- Perchlorate; and
- Explosive-related compounds (e.g., HDX, RDX, PETN, etc.).

Refer to [Section 9](#) of the HEER Office TGM for more details on pesticide contaminants that could be a concern for certain sites. Leaching of these COPCs from fill material could pose a significant threat to groundwater resources. If using the proposed fill material is still desired, then the HEER Office recommends a sample frequency of one DU per 20 yd^3 . This is assumed to represent the minimum size of a spill area that could pose potentially significant leaching hazards. If the reported concentration of a chemical exceeds HDOH leaching based action levels, then a site-specific soil leaching test can be carried out and an alternative action level developed (HDOH 2016c).

The mobility of metals in soil is generally assumed to be low, but should be evaluated on a site-by-site basis. If needed, potential metal mobility should be evaluated by a batch test in accordance with HEER Office guidance (refer to HDOH 2016c).

As discussed in [Section 9.1](#) of the HEER Office TGM, former agricultural fields do not need to be tested for chlorinated herbicides and other pesticides with low persistence to clear these areas for redevelopment or to clear the soil in the fields for use as fill material. Sampling should instead focus on persistent, non-mobile, and potentially toxic chemicals such as arsenic, dioxins, and organochlorine pesticides. Testing of stockpiles for these types of chemicals is discussed in the following section.

5.1.3.4 Stockpiled Fill Material Potentially Contaminated with Low Mobility, Nonvolatile Contaminants

Characterization of stockpiled soil that is not suspected to be contaminated with volatile or otherwise highly mobile contaminants for use as fill material is not cost-prohibitive in most cases. Nonvolatile COPCs like metals, PCBs, organochlorine pesticides, dioxins, and PAHs primarily pose direct exposure hazards. Evaluating potential direct-exposure hazards in proposed fill material can be done

using DUs of larger volume in comparison to the DU volumes recommended for soil that might be contaminated with VOCs or highly mobile chemicals. The HEER Office recommends a sample frequency of one DU per 100 yd³ of soil for unrestricted use of stockpile soil as fill material (see [Table 5](#)), with one Multi Increment sample per DU (plus replicates). This DU volume equates to the approximate volume of soil needed to cover a hypothetical, 5,000 ft² residential yard (default residential exposure area) 6 inches deep (default depth for evaluation of surface soil, direct exposure concerns).

If proposed fill material is to be used at a school, a high-density residential development (e.g., townhomes, apartment buildings, etc.) or a commercial or industrial site, then a default sample frequency of one DU per 400 yd³ is recommended. This DU volume equates to the approximate volume of soil needed to cover a hypothetical, 20,000 ft² area 6 inches deep (default exposure area).

Larger DU volumes may be appropriate for large dredging projects if the source is expected to be relatively homogeneous. For example, dredge material is often used to replenish beaches. An exposure area size of 1 acre is generally appropriate for this type of setting. Assuming a depth of 6 inches, this equates to a stockpile DU volume of approximately 800 yd³. Using dredged material as fill material for commercial or industrial areas, and in particular residential developments, should be discussed with the HEER Office on a case-by-case basis.

[Section 3](#) of the HEER Office TGM includes additional information and options for selecting DUs for residential development projects.

5.1.3.5 Collection of Multi Increment Samples from Stockpiles

As described in [Section 4](#) of the HEER Office TGM (HDOH 2016b), it is important to have equal and unbiased access to all parts of a soil stockpile during the collection of Multi Increment (MI) samples. An MI sample collected from a stockpile DU must be representative of the entire, three-dimensional mass of the stockpile. Sampling only the outer surface of a large stockpile is generally not acceptable.

The HEER Office recommends that a Multi Increment sample be collected from each stockpile DU, with each sample typically consisting of at least 30 to 75 increments, depending in part on the nature of the contaminant of concern (refer to Section 4.2.2 of the HEER TGM). Increments are typically collected and physically combined in the field into a single Multi Increment sample for laboratory analysis, though individual increments could be sent to and combined in the laboratory into a single MI sample. For non-volatile chemical samples, the less than 2-millimeter particle size fraction obtained by sieving the entire sample through a ≤ 2 mm sieve, should be sub-sampled by the laboratory using a sectorial splitter or MI sampling methods and analyzed unless otherwise directed by the HEER Office. Multi Increment samples should be sub-sampled wet (or wet-sieved) for certain semi-volatile contaminants (see Semi-Volatile Chemicals in [Appendix 1](#)), but can be air dried and dry-sieved for some other “low mobility” semi-volatiles (and all non-volatile contaminants). Refer to Section 4 of the HEER Office TGM. Separation of the less than 0.25 mm particle size fraction is required for bioaccessible arsenic and lead analysis.

5.1.3.6 Sampling During Stockpile Formation

If sampling the proposed fill material *in-situ* is not practical, consider collecting MI samples as the fill material is being excavated and placed into stockpiles. Collecting samples from the soil while it is being transferred from the source area to a stockpile permits equal and unbiased access to the entire mass of soil and the preparation of representative samples. The collection of samples while heavy equipment is being used to form stockpile could pose safety issues. Close coordination with equipment operators is therefore very important.

Appropriate DU areas and volumes are established in the field in the same manner as done for an *in-situ* investigation. DUs are then excavated one at a time and sampled as the soil is being transferred to or placed in the stockpile. When implementing this approach, the individual increments can be collected directly from heavy equipment (e.g., front-end loader buckets) at appropriate intervals based on the designated DU volume as the stockpile is being formed.

For example, at a source property using 20-ton trucks to export fill material and with a target DU volume of 100 yd³, ten increments of the proposed fill material could be randomly collected from five truckloads of material (total of 50 increments in the MI sample). Alternatively, at a source property using 20-ton trucks to export fill material and with a target DU volume of 1,000 yd³, a single increment of the proposed fill material could be collected from each of 50 truckload-amount of material (total 50 increments in the MI sample).

The proposed fill material stockpile(s) should be kept separate from other stockpiles at the source property and clearly marked until receipt of the analytical data confirms the fill material is acceptable for its intended use.

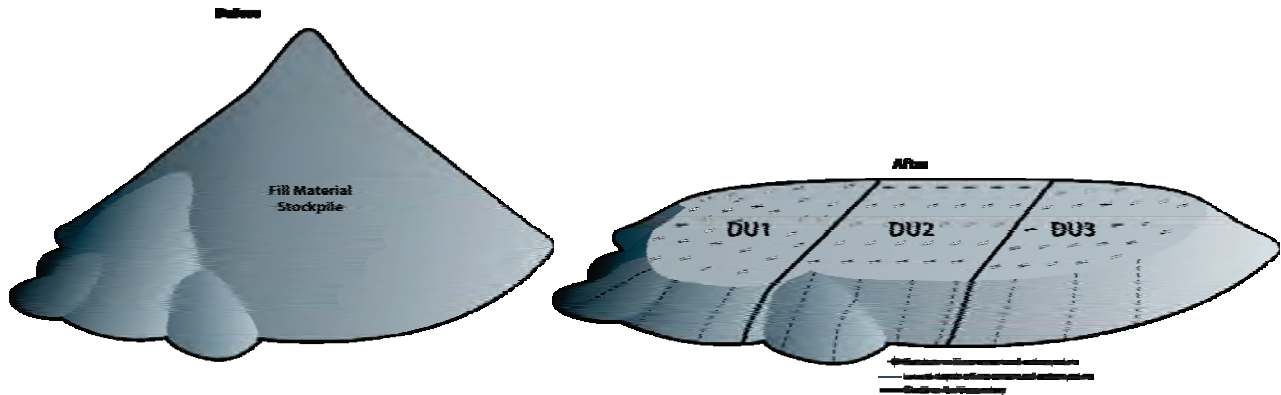
5.1.3.7 Sampling After Stockpile Formation

Sampling existing stockpiles presents a number of access and safety issues that may affect sample data quality. Where access or safety issues are significant concerns in collecting representative samples from existing stockpiles, the HEER Office should be consulted on options for alternate sampling strategies. A description of common approaches to sampling existing stockpiles is described below. If the soil is to be tested for volatile contaminants, increments should be collected from deeper than 6 to 12 inches below the surface of the stockpile using a VOC-specialized sampling device and preserved in methanol in the field (refer to [Section 4.2.7](#) of the HEER Office TGM).

If room permits, existing stockpiles can be flattened or spread out sufficiently, so that the interior of the pile can be accessed with a hand coring tool or other device (see Figure 2; and refer to [Section 5](#) of the HEER Office TGM). Another option is to move the stockpile to an adjacent or nearby location. As the fill material is being moved, individual increments can be collected directly from the heavy equipment (e.g., front-end loader buckets) at appropriate intervals (based on the designated DU volume). In essence, this is the same method as described for sampling during stockpile formation. If an existing soil stockpile is relatively large, the stockpile should be subdivided into multiple DU volumes as it is being moved. As the stockpile is being subdivided, individual increments can be collected directly

from the heavy equipment (e.g., front-end loader buckets) at appropriate intervals (based on the designated DU volume).

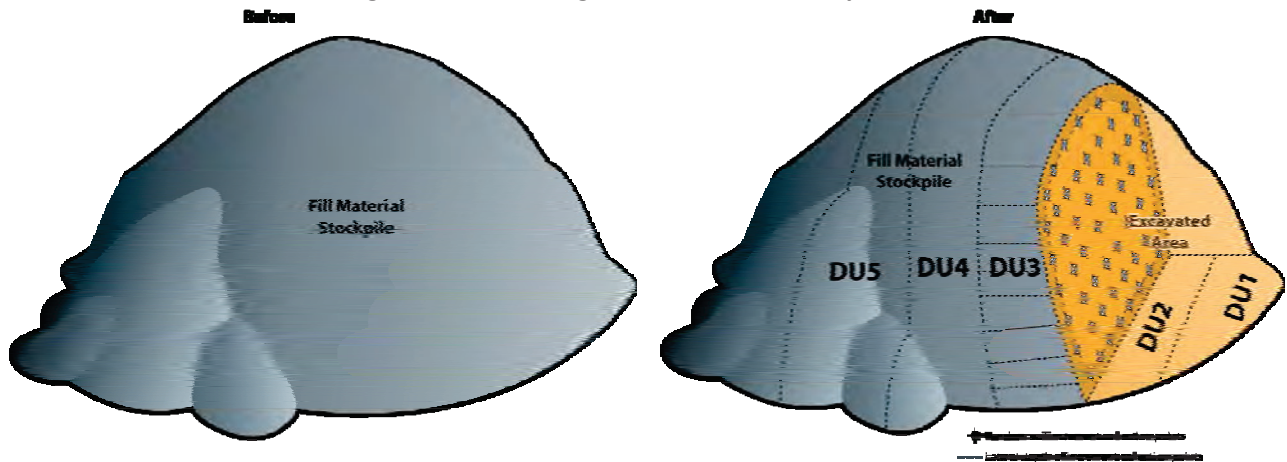
Figure 2 – Flattening or Spreading a Stockpile



The existing fill material stockpile (left) is too large to safely access. By flattening or spreading the stockpile (right), the fill material can be safely accessed and a representative MI sample can be collected from the surface using manual sampling techniques (e.g., hand coring tool).

If a stockpile cannot be moved or flattened, the interior of the stockpile can be accessed by successively removing a “face” of the stockpile and collecting increments from the newly exposed material (see Figure 3), or using manual sampling techniques to access the interior of the stockpile. This approach may require removing multiple faces of the stockpile to collect a representative MI sample.

Figure 3 – Removing “Faces” from a Stockpile



If an existing fill material stockpile (left) is too large to flatten or move, increments may be collected from the initially accessible portions of the stockpile. Then a “face” can be removed (right) to expose the previously inaccessible inner portions. Collect additional increments from each successive face of the stockpile and combine them to form an MI sample. Take appropriate safety precautions when using this approach.

5.1.4 Selecting DUs for Very Large Source Areas or Stockpile Volumes

Testing the entire area or volume of very large, *in-situ* or stockpiled sources of fill material at the default DU sizes (Tables 3 and 5) may not be practical due to feasibility issues and/or costs. An alternative is to test a select number of DUs within the entire population of potential DUs and base conclusions on acceptability of the results. Section 3 of the HEER Office TGM recommends use of a non-parametric, one-sided tolerance interval test to select an appropriate number of DUs from a large population based on a target confidence level, as summarized in Table 6 (also see USEPA 1989), similar to the approach used to test very large, agricultural fields (see TGM Section 3.4.8.2).

Table 6 – Selecting Number of DUs for Very Large Source Areas

Confidence in Concluding Source Area is Clean ¹	Number of DUs That Must be Tested
99%	90
95%	59
90%	46
80%	32
60%	18
Notes:	
1. Assumes proportion of site that is clean is 95%, and all DUs tested are found below applicable action limits	

Table 6 reflects the degree of confidence that the concentration of a contaminant in DUs that were not tested (across the entire large area or large stockpile volume) will be at or below the maximum-reported value for tested DUs at least 95% of the time. Clearance of the entire area or volume of soil requires that none of the tested DUs exceed target soil action levels. The HEER office TGM recommends the collection of a minimum 59 samples (DUs of the appropriate size with MI samples) from a large source area or stockpile in order to receive formal clearance from HDOH for unrestricted use. A smaller number of DUs and may be acceptable based on knowledge of the source area, sampling objectives, and professional judgment, although formal concurrence by the HEER Office should be agreed on ahead of time. Testing of a minimum of 18 DUs (plus triplicate samples collected in 10 percent of the DUs) to allow for a minimum 60% confidence level is recommended under any circumstance, and typically for only an industrial or commercial land use scenario. It is important to note that such a minimal degree of characterization may require institutional controls and an Exposure Hazard Management Plan for a property that specifies retesting of the receiving property before it can be converted to a more sensitive land use in the future.

DUs should be systematically, randomly selected within the subject source area or stockpile and tested for targeted COPC. All portions of the subject area or stockpile should have an equal opportunity for access and sampling.

If reported levels of COPCs in all DUs sampled are below applicable HDOH Tier I EALs, then the entire HDOH HEER Office

source area or stockpile should be considered cleared to the applicable confidence interval based on number of DUs selected. If the reported concentration of COPCs in one or more DU exceeds the applicable HDOH Tier I EALs, then additional subdivision and testing of the fill material will be needed in order to isolate acceptable and unacceptable soil for use as fill material. The HEER Office should be consulted on evaluation or additional sampling strategies in these cases.

There may also be some cases for very large stockpiles of soil (e.g., thousands to tens of thousands of cubic yards) where the generator knows the origin and history of the soil well, and previous testing or knowledge about the site indicates that chemical contaminants do not exceed applicable environmental action levels. In these cases, only a minimal amount of testing is desired (by generator) to confirm the presence or absence of significant contamination and the generator is typically not seeking a “clean” concurrence letter from the HEER Office for unrestricted use. This is similar to informal screening of a very large former agricultural field with a smaller number of one-acre DUs than the 59 required to get a clean concurrence letter from the HEER Office (see [Section 3.5](#) of the HEER Office TGM). For these cases, a maximum DU volume of 800 yd³ (from a single fill source) is recommended. This is based on the volume of soil required to cover a one-acre area of land to a depth of six inches. An area of one acre is commonly used in risk assessments as an upper size limit for evaluation of direct exposure hazards posed by soil contaminants. Such soil data should be used as one of multiple lines of evidence regarding the potential for significant contamination to be present in the soil and for final decision-making.

6.0 Comparison to HDOH Soil Action Levels

Soil data should initially be compared to HEER Office Tier I Environmental Action Levels for soil under an unrestricted (e.g., residential) land use, assuming sites are situated within 150 meters of a surface water body and overlying groundwater that is a potential or current drinking water source (HDOH 2016a). Refer to that guidance document for additional information on case-specific evaluation of risk to human health and the environmental and development of potential alternative screening levels.

As described above, HEER Office guidance on leaching of contaminants from soil can be used to evaluate this potential concern if initial action levels are exceeded (HDOH 2016a). This may be a frequent issue for soil contaminated with trace amounts of semi-mobile pesticides such as dieldrin, endrin, and endosulfan. Laboratory batch tests typically determine that aged pesticides are essentially immobile in soil (e.g., $K_d > 20$). This allows the leaching based action levels to be ignored, with a subsequent focus on (typically much higher) direct- exposure action levels for these chemicals (refer to Table I series in HEER Office EHE guidance, HDOH 2016a). Alternative soil action levels (e.g., alternative target risks, exposure assumptions, etc.) should be discussed with the HEER office on a case-by-case basis. Note that alternative action levels may restrict future, offsite reuse of the soil and require preparation of an Environmental Hazard Management Plan for long-term management of the soil. In some cases, a formal deed covenant that restricts offsite use of the soil may also be required.

7.0 Fill Material Categories

Fill material characterized under the environmental action level guidance presented above is placed

into four categories (Table 7):

Table 7 – Fill Material Categories and Use Considerations

Fill Material Category	Use Considerations
Class A	Background – Unrestricted Use. Within range of expected background conditions in non-agricultural and non-industrial areas. Class A fill material is likely to be limited to quarries and similar sites where there is minimal likelihood of anthropogenic contamination. No use restrictions.
Class B	Minimally Impacted – Unrestricted Use. Contaminants exceed expected background concentrations of contaminants but below ¹ Tier I soil EALs for unrestricted land use (or acceptable alternatives). Most fill material from developed areas as well as former agricultural fields is anticipated to fall within into this category. No use restrictions.
Class C	Moderately Impacted – Commercial/Industrial Land Use Only. Contaminants exceed Tier I soil EALs for unrestricted land use but do not pose leaching, vapor intrusion or gross contamination hazards and concentrations do not exceed direct-exposure action levels for commercial/industrial land use. (Refer to Appendix 1, Table I-2 of EHE guidance (HDOH HEER Office 2016) and Tier II guidance for dioxins and arsenic (HDOH HEER Office, 2010b, HDOH HEER Office, 2010c). Fill material from former industrial areas or areas where fill material is impacted with incinerator ash may fall into this category. Use restricted to commercial/industrial areas only or as interim cover at a regulated landfill. These sites typically require institutional controls and an EHMP (see Sections 19.6 and 19.7 of the HEER Office TGM). TCLP tests must be carried out as part of a hazardous waste determination of offsite reuse or disposal.
Class D	Heavily Impacted – Use As Fill not Recommended. Exceeds Tier I soil EALs (or acceptable alternatives) and poses unacceptable risks to human health and the environment under any land use scenario. Use as fill material not recommended.
<p>Notes:</p> <ol style="list-style-type: none"> 1. Tier 1 EALs for unrestricted land use, for sites situated within 150m of a surface water body and overlying groundwater that is a potential or current source of drinking water. 	

8.0 Other Fill Material Management Considerations

Using Class A or Class B fill material (see Table 7) does not require a permit or long-term management practices. However, using fill materials is subject to other State of Hawai'i environmental laws and regulations (e.g., erosion and sediment control [county-specific grading ordinances], stormwater pollution prevention [HDOH Clean Water Branch – Hawai'i Administrative Rules Title 11 Chapter 55], etc.).

Using Class C fill material requires long-term management practices, an EHMP, and coordination with both the HEER Office and the SHWB. A hazardous waste determination that includes TCLP data must also be carried out (refer to Section 2 and Figure 1). Whenever “earthwork” occurs in Class C fill areas or the site use changes, the EHMP must be followed, as applicable, or the work/changes conducted under HEER Office oversight. In addition, the site EHMP may have to be updated as a result of any changes. The HEER Office should be consulted if Class C fill is proposed to be moved to another location for reuse. Since the receiving site land use category dictates the sampling needs for characterization, analytical data from larger DUs may not be appropriate to make determinations for a land use with smaller DU requirements ([Table 3](#)).

Landowners or developers are strongly encouraged to maintain the appropriate documentation supporting the fill determination process (e.g. the latest Phase I ESA, or fill material characterization report). The HEER Office will also maintain any submitted documentation in the site records in perpetuity. These documents will be made available for future environmental due diligence reviews or public file requests.

If earthen material under or directly adjacent to existing structures is planned for use as fill material, best management practices must be followed to remove materials such as lead-based paint, asbestos, canec, and other structure-related hazardous materials (e.g., mercury switches and light ballasts, PCB-containing equipment, etc.) prior to demolition. Take care to avoid cross-contamination to the underlying earthen materials.

It is important to recognize that soil adjacent to and under the foundations and slabs of pre-1990 buildings or building sites in Hawai'i may have been treated for termites with technical chlordane, aldrin, dieldrin, or other persistent and potentially toxic pesticides, as discussed in the HEER Office fact sheet on termiticides (HDOH 2011e). Soil under and adjacent to these buildings or at these former building sites should be considered suspect unless otherwise demonstrated to be “clean” by knowledge or by sampling and analytical testing (see sampling guidance for termiticides in HDOH 2011b). Testing of soils and plans for proper management should be initiated early in the planning stages of a redevelopment project.

All landfills in Hawai'i are prohibited from accepting regulated hazardous waste. Each landfill has its own acceptance procedures to ensure that they comply with this requirement. Generators should contact the specific landfill to ensure compliance with the landfill's acceptance criteria and operational procedures. Landfill owners/operators have the prerogative to implement requirements that are more

strict than state regulations.

The HEER Office suggests using the Commercial/Industrial receiving site land use category (Table 3) in determining recommended DU size (e.g., 400 yd³) when testing soils for suitability as landfill daily/interim/ intermediate/ final cover. Some landfills accept soils with contaminant concentrations over Tier I EALs but less than Commercial/Industrial land use EALs for use as landfill daily cover. If soils are being tested for hazardous waste determination and/or suitability as landfill cover, the maximum recommended DU size should be considered, and verified as necessary with the HDOH Solid and Hazardous Waste Branch and/or with the landfill operator.

In some cases, the HEER Office allows capping and long-term management of contaminated soil on a property. The HEER Office recommends that utility trenches that could be periodically accessed for maintenance or other purposes be backfilled with acceptable fill material (Class A or Class B Fill, [Table 7](#)). This will minimize exposure to trench and utility workers to contaminated soil in the future, as well as help prevent the inadvertent reuse of excavated contaminated soil at another location. The use of Class C fill material is not recommended, as it will require additional health, safety, and environmental considerations (and possible HEER Office oversight) whenever trench work is performed in the future.

8.1 Excavation Activities on Sites with Environmental Hazard Management Plans

Excavation activities at sites with contaminated soil that is governed by a long-term environmental hazard management plan (EHMP) need to follow the site-specific procedures and precautions outlined in the EHMP (e.g., sub-surface utility or repair work in contaminated areas, refer to [Section 19](#) of the TGM). If specific procedures or precautions for excavation are not detailed in the EHMP, the HEER Office should be consulted to review and approve the planned excavation. Any potentially contaminated soil proposed to be relocated to the surface, taken off-site, or moved to alternate locations other than those locations specified in the EHMP must be handled or tested, as appropriate. Actions related to the disturbance of contaminated soil will need to be documented, including making appropriate revisions or addendums to the EHMP, and submitting them to the HEER Office.

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Appendix 1: Chemical Mobility Categories

Chemical Categories and Relative Mobility

¹ Physiochemical Category	CHEMICAL	Physical State		Molecular Weight	² Vapor Pressure	Sorption Coefficient K _{oc}	Henry's Law Constant H
					mm Hg (25C)	(cm ³ /g)	(atm·m ³ /mol)
² Highly Volatile Chemicals	ACETONE	V	L	58	2.3E+02	1.98E+00	3.90E-05
	BENZENE	V	L	78	9.5E+01	1.66E+02	5.61E-03
	BIS(2-CHLOROISOPROPYL)ETHER	V	L	171	1.6E+00	6.10E+01	1.13E-04
	BROMODICHLOROMETHANE	V	L	164	5.0E+01	3.50E+01	2.12E-03
	BROMOFORM	V	S	253	5.4E+00	3.50E+01	5.37E-04
	BROMOMETHANE	V	G	95	1.6E+03	1.43E+01	6.34E-03
	CARBON TETRACHLORIDE	V	L	154	1.2E+02	4.86E+01	2.68E-02
	CHLOROETHANE	V	L	113	1.2E+01	2.68E+02	3.17E-03
	CHLOROETHANE	V	G	65	1.0E+03	2.37E+01	1.10E-02
	CHLOROFORM	V	L	119	2.0E+02	3.50E+01	3.66E-03
	CHLOROMETHANE	V	G	50	4.3E+03	1.43E+01	8.78E-03
	CHLOROPHENOL, 2-	V	L	129	2.5E+00	4.43E+02	1.12E-05
	DIBROMOCHLOROMETHANE	V	S	208	5.5E+00	3.50E+01	7.80E-04
	DIBROMOETHANE, 1,2-	V	S	188	1.1E+01	4.38E+01	6.59E-04
	DICHLOROBENZENE, 1,2-	V	L	147	1.4E+00	4.43E+02	1.90E-03
	DICHLOROBENZENE, 1,3-	V	L	147	2.2E+00	6.17E+02	1.90E-03
	DICHLOROBENZENE, 1,4-	V	S	147	1.7E+00	4.34E+02	2.41E-03
	DICHLOROETHANE, 1,1-	V	L	99	2.3E+02	3.50E+01	5.61E-03
	DICHLOROETHANE, 1,2-	V	L	99	7.9E+01	4.38E+01	1.17E-03
	DICHLOROETHYLENE, 1,1-	V	L	97	6.0E+02	3.50E+01	2.68E-02
	DICHLOROETHYLENE, Cis 1,2-	V	L	97	2.0E+02	4.38E+01	4.15E-03
	DICHLOROETHYLENE, Trans 1,2-	V	L	97	3.3E+02	4.38E+01	9.27E-03
	DICHLOROPROPANE, 1,2-	V	L	113	5.3E+01	6.77E+01	2.93E-03
	DICHLOROPROPENE, 1,3-	V	L	111	3.4E+01	8.08E+01	3.66E-03
	DIOXANE, 1,4-	V	L	88	3.8E+01	1.00E+00	4.88E-06
	ETHANOL	V	L	46	5.9E+01	3.09E-01	6.29E-06
	ETHYLBENZENE	V	L	106	9.6E+00	5.18E+02	7.80E-03
	METHYL ETHYL KETONE	V	L	72	9.1E+01	3.83E+00	5.61E-05
	METHYL ISOBUTYL KETONE	V	L	100	2.0E+01	1.09E+01	1.37E-04
	METHYL TERT BUTYL ETHER	V	L	88	2.5E+02	5.26E+00	5.85E-04
	METHYLENE CHLORIDE	V	L	85	4.4E+02	2.37E+01	3.17E-03
	STYRENE	V	L	104	6.4E+00	5.18E+02	2.68E-03
	tert-BUTYL ALCOHOL	V	L	74	4.1E+01	3.70E+01	1.17E-05
	TETRACHLOROETHANE, 1,1,1,2-	V	L	168	4.6E+00	9.66E+01	2.41E-03
	TETRACHLOROETHANE, 1,1,1,2,2-	V	L	168	4.6E+00	1.07E+02	3.66E-04
	TETRACHLOROETHYLENE	V	L	166	1.9E+01	1.07E+02	1.76E-02
	TOLUENE	V	L	92	2.8E+01	2.68E+02	6.59E-03
	TPH (gasolines)	V	L	108	6.8E+02	5.00E+03	7.20E-04
	TRICHLOROETHANE, 1,1,1-	V	L	133	1.2E+02	4.86E+01	1.71E-02
	TRICHLOROETHANE, 1,1,2-	V	L	133	2.3E+01	6.77E+01	8.29E-04
	TRICHLOROETHYLENE	V	L	131	6.9E+01	6.77E+01	9.76E-03
	TRICHLOROPROPANE, 1,2,3-	V	L	147	3.7E+00	1.31E+02	3.41E-04
TRICHLOROPROPENE, 1,2,3-	V	L	145	3.7E+00	5.10E+01	2.80E-02	
VINYL CHLORIDE	V	G	63	3.0E+03	2.37E+01	2.68E-02	
XYLENES	V	L	106	8.0E+00	4.34E+02	7.07E-03	

Chemical Categories and Relative Mobility

¹ Physiochemical Category	CHEMICAL	Physical State		Molecular Weight	² Vapor Pressure	Sorption Coefficient K _{oc}	Henry's Law Constant H
					mm Hg (25C)	(cm ³ /g)	(atm·m ³ /mol)
³Highly Leachable Chemicals	AMETRYN	NV	S	227	2.7E-06	4.45E+02	2.39E-09
	AMINO,2- DINITROTOLUENE,4,6-	NV	S	197	-	1.01E+02	1.61E-10
	AMINO,4- DINITROTOLUENE,2,6-	NV	S	197	-	1.01E+02	1.61E-10
	ATRAZINE	NV	S	216	2.9E-07	2.30E+02	2.34E-09
	BIS(2-CHLOROETHYL)ETHER	SV	L	143	8.5E-01	1.50E+01	1.71E-05
	CHLOROANILINE, p-	NV	S	128	7.1E-02	7.25E+01	1.15E-06
	CYCLO-1,3,5-TRIMETHYLENE-2,4,6-TRINITRAMINE (RDX)	NV	S	222	4.1E-09	1.95E+02	6.34E-08
	DALAPON	NV	L	143	1.9E-01	2.74E+00	9.02E-08
	DIBROMO,1,2- CHLOROPROPANE,3-	SV	L	236	5.8E-01	1.31E+02	1.46E-04
	DIMETHYLPHENOL, 2,4-	SV	S	122	1.0E-01	7.18E+02	9.51E-07
	DICHLOROPHENOL, 2,4-	NV	S	163	9.0E-02	7.18E+02	2.20E-06
	DICHLOROPHENOXYACETIC ACID (2,4-D)	NV	S	221	8.3E-08	2.94E+01	3.41E-08
	DIETHYLPHTHALATE	NV	S	222	2.1E-03	1.26E+02	6.10E-07
	DIMETHYLPHTHALATE	NV	S	194	3.1E-03	1.40E+02	1.05E-07
	DINITROBENZENE, 1,3-	NV	S	168	2.0E-04	2.20E+02	4.88E-08
	DINITROPHENOL, 2,4-	NV	S	184	3.9E-04	3.64E+02	8.54E-08
	DINITROTOLUENE, 2,4- (2,4-DNT)	NV	S	182	1.5E-04	3.64E+02	5.37E-08
	DINITROTOLUENE, 2,6- (2,6-DNT)	NV	S	182	5.7E-04	3.71E+02	7.56E-07
	DIURON	NV	S	233	6.9E-08	1.36E+02	5.12E-10
	GLYPHOSATE	NV	S	169	9.8E-08	1.88E+01	4.15E-19
	HEXACHLOROBUTADIENE	NV	S	261	2.2E-01	9.94E+02	1.02E-02
	HEXACHLOROETHANE	NV	S	237	4.0E-01	2.25E+02	3.90E-03
	HEXAZINONE	NV	S	252	2.3E-07	6.14E+02	2.24E-12
	ISOPHORONE	NV	L	138	4.4E-01	5.83E+01	6.59E-06
	NITROBENZENE	SV	L	123	2.5E-01	1.91E+02	2.39E-05
	NITROGLYCERIN	NV	L	227	2.0E-04	1.31E+02	9.76E-08
	NITROTOLUENE, 4-	NV	S	137	1.6E-01	3.09E+02	5.61E-06
	NITROTOLUENE, 2-	SV	S	137	1.9E-01	3.16E+02	1.24E-05
	NITROTOLUENE, 3-	SV	S	137	2.1E-01	3.33E+02	2.39E-05
	PENTAERYTHRITOLTETRANITRATE (PETN)	NV	S	316	1.4E-07	1.51E+02	1.20E-11
PERCHLORATE	NV	S	117	-	-	-	
PHENOL	NV	S	94	3.5E-01	2.68E+02	3.41E-07	
SIMAZINE	NV	S	202	2.2E-08	1.49E+02	9.51E-10	
TERBACIL	NV	S	217	4.7E-07	7.78E+01	1.20E-10	
TRICHLOROBENZENE, 1,2,4-	SV	S	181	4.6E-01	7.18E+02	1.41E-03	
TRICHLOROPHENOXYACETIC ACID, 2,4,5- (2,4,5-T)	NV	S	255	<7.5E-5	4.86E+01	4.63E-08	
TRICHLOROPHENOXYPROPIONIC ACID, 2,4,5- (2,4,5-TP)	NV	S	270	9.7E-07	8.04E+01	9.02E-09	
⁴Semi-Volatile Chemicals	ACENAPHTHENE	SV	S	154	2.2E-03	6.12E+03	1.80E-04
	ACENAPHTHYLENE	SV	S	152	6.7E-03	2.50E+03	1.45E-03
	ANTHRACENE	SV	S	178	6.6E-06	2.04E+04	5.61E-05
	BIPHENYL, 1,1-	SV	S	154	8.9E-03	6.25E+03	3.17E-04
	CYANIDE (Free)	SV	S	27	1.0E+00	-	-
	FLUORENE	SV	S	166	3.2E-04	1.13E+04	9.51E-05
	MERCURY	SV	S	201	2.0E-03	-	-
	METHYLNAPHTHALENE, 1-	SV	S	142	6.7E-02	3.04E+03	5.12E-04
	METHYLNAPHTHALENE, 2-	SV	S	142	5.5E-02	2.98E+03	5.12E-04
	NAPHTHALENE	SV	S	128	8.5E-02	1.84E+03	4.39E-04
	PHENANTHRENE	SV	S	178	1.2E-04	1.40E+04	3.93E-05
	PYRENE	SV	S	202	4.5E-06	6.94E+04	1.20E-05
	TPH (middle distillates)	SV	L	170	2 to 26	5.00E+03	7.20E-04

Chemical Categories and Relative Mobility

¹ Physiochemical Category	CHEMICAL	Physical State		Molecular Weight	² Vapor Pressure	Sorption Coefficient K _{oc}	Henry's Law Constant H
					mm Hg (25C)	(cm ³ /g)	(atm·m ³ /mol)
⁵ Low Mobility Organic Chemicals	ALDRIN	NV	S	365	1.2E-04	1.06E+05	4.39E-05
	BENZO(a)ANTHRACENE	NV	S	228	5.0E-09	2.31E+05	1.20E-05
	BENZO(a)PYRENE	NV	S	252	5.5E-09	7.87E+05	4.63E-07
	BENZO(b)FLUORANTHENE	NV	S	252	5.0E-07	8.03E+05	6.59E-07
	BENZO(g,h,i)PERYLENE	NV	S	276	-	1.60E+06	1.44E-07
	BENZO(k)FLUORANTHENE	NV	S	252	9.7E-10	7.87E+05	5.85E-07
	BIS(2-ETHYLHEXYL)PHTHALATE	NV	S	391	1.4E-07	1.65E+05	2.68E-07
	CHLORDANE (TECHNICAL)	NV	S	410	9.8E-06	8.67E+04	4.88E-05
	CHRYSENE	NV	S	228	6.2E-09	2.36E+05	5.12E-06
	DIBENZO(a,h)ANTHTRACENE	NV	S	278	9.6E-10	2.62E+06	1.22E-07
	DICHLOROBENZIDINE, 3,3-	NV	S	253	2.6E-07	7.49E+03	5.12E-11
	DICHLORODIPHENYLDICHLOROETHANE (DDD)	NV	S	320	1.4E-06	1.53E+05	6.59E-06
	DICHLORODIPHENYLDICHLOROETHYLENE (DDE)	NV	S	318	6.0E-06	1.53E+05	4.15E-05
	DICHLORODIPHENYLTRICHLOROETHANE (DDT)	NV	S	354	1.6E-07	2.20E+05	8.29E-06
	DIELDRIN	NV	S	381	5.9E-06	1.06E+04	1.00E-05
	DIOXINS (TEQ)	NV	S	356	1.5E-09	2.57E+05	2.20E-06
	ENDOSULFAN	NV	S	407	1.7E-07	2.20E+04	6.59E-05
	ENDRIN	NV	S	381	9.2E-06	1.06E+04	6.34E-06
	FLUORANTHENE	NV	S	202	9.2E-06	7.09E+04	8.78E-06
	HEPTACHLOR	NV	S	373	4.0E-04	5.24E+04	2.93E-04
	HEPTACHLOR EPOXIDE	NV	S	389	2.0E-05	5.26E+03	2.10E-05
	HEXACHLOROBENZENE	NV	S	285	4.9E-05	3.38E+03	1.71E-03
	HEXACHLOROCYCLOHEXANE (gamma) LINDANE	NV	S	291	4.2E-05	3.38E+03	5.12E-06
	INDENO(1,2,3-cd)PYRENE	NV	S	276	1.2E-10	2.68E+06	3.41E-07
	METHOXYCHLOR	NV	S	346	4.2E-05	4.26E+04	2.02E-07
	PENTACHLOROPHENOL	NV	S	266	1.1E-04	3.38E+03	2.44E-08
	POLYCHLORINATED BIPHENYLS (PCBs)	NV	S	326	7.7E-05	7.56E+04	2.93E-04
	PROPICONAZOLE	NV	L	342	1.0E-06	5.56E+03	4.15E-09
	TETRACHLOROPHENOL, 2,3,4,6-	NV	S	232	4.2E-03	2.00E+03	8.78E-06
	TETRANITRO-1,3,5,7-TETRAAZOCYCLOOCTANE (HMX)	NV	S	296	2.4E-08	1.85E+03	8.54E-10
	TOXAPHENE	NV	S	414	6.7E-06	9.93E+04	6.10E-06
	TRICHLOROPHENOL, 2,4,5-	NV	S	198	-	1.19E+03	1.61E-06
TRICHLOROPHENOL, 2,4,6-	NV	S	198	-	1.19E+03	2.68E-06	
TRIFLURALIN	NV	S	335	4.6E-05	9.68E+03	1.02E-04	
TRINITROBENZENE, 1,3,5-	NV	S	213	6.4E-06	1.09E+03	3.17E-09	
TRINITROPHENYLMETHYLNITRAMINE, 2,4,6- (TETRYL)	NV	S	287	1.2E-07	2.14E+03	2.68E-09	
TRINITROTOLUENE, 2,4,6- (TNT)	NV	S	227	8.0E-06	1.83E+03	4.63E-07	
⁶ Assumed Low-Mobility Metals	ANTIMONY	NV	S	122	-	-	-
	ARSENIC	NV	S	75	-	-	-
	BARIUM	NV	S	137	-	-	-
	BERYLLIUM	NV	S	9	-	-	-
	BORON	NV	S	14	-	-	-
	CADMIUM	NV	S	112	-	-	-
	CHROMIUM (Total)	NV	S	52	-	-	-
	CHROMIUM III	NV	S	52	-	-	-
	CHROMIUM VI	NV	S	52	-	-	-
	COBALT	NV	S	59	-	-	-
	COPPER	NV	S	64	-	-	-
	LEAD	NV	S	207	-	-	-
	METHYL MERCURY	SV	S	216	-	-	-
	MOLYBDENUM	NV	S	96	-	-	-
	NICKEL	NV	S	59	-	-	-
	SELENIUM	NV	S	81	-	-	-
	SILVER	NV	S	108	-	-	-
	THALLIUM	NV	S	204	-	-	-
	VANADIUM	NV	S	51	-	-	-
	ZINC	NV	S	67	-	-	-

Notes:

1. References: Appendix 1, Table H of HEER office EHE guidance (HDOH 2016a). Vapor Pressures from National Library of Medicine TOXNET or ChemID databases.

Physical state of chemical at ambient conditions (V - volatile, NV - nonvolatile, S - solid, L - liquid, G - gas). Koc: Organic Carbon Partition Coefficient; H: Henry's Law Constant

2. Chemical considered to be "volatile" if vapor pressure >1 mm Hg. Volatile chemicals pose potential vapor intrusion hazards. Volatile chemicals can also pose potential leaching hazards and direct-exposure hazards (due to vapor emissions at ground surface).

3. Chemicals with a sorption coefficient (koc) less than 1,000 g/cm³ pose potential leaching hazards. Some highly leachable compounds are also semi-volatile and could pose vapor intrusion hazards at high source strengths.

4. Chemical considered to be "semi-volatile" if vapor pressure <1 mm Hg but Henry's number (atm m³/mole) >0.00001 and molecular weight <200. Semi-volatile chemicals can pose vapor intrusion hazards at sufficiently high concentrations and source strength (e.g., free product present) and can also pose potential direct exposure hazards. Most compounds in middle distillate fuels are semi-volatile, especially in aged releases.

5. Chemical considered to be "Low Mobility" if non-volatile and not significantly leachable. Low-mobility chemicals primarily pose potential direct-exposure hazards.

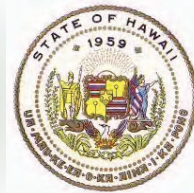
6. Metals primarily pose direct-exposure hazards. Evaluate metal mobility using batch tests as necessary (HDOH 2016a).

Appendix 2: Construction and Demolition Waste Disposal General Guidance



Construction & Demolition (C&D) Waste Disposal

State of Hawaii, Department of Health



2013

Background Information

This C&D waste disposal guidance supersedes the previous letter dated May 24, 1996. Although the waste composition varies from project to project, C&D wastes generally consist of concrete, wood, metal, glass, plastic, asphalt, tile, drywall, roofing and insulation material. These wastes are often bulked as one waste stream when sent for disposal. With advance planning, most of these wastes can be reused on the job site and/or salvaged for recycling opportunities.

Another type of C&D waste stream sometimes generated from a construction project is excavated soil. If the C&D waste is designated for disposal to a landfill or to any other off-site location, the contractor must make a hazardous waste determination in accordance with the Hawaii Administrative Rules (HAR) §11-262-11. Making a hazardous waste determination is a step-by-step process, and should start with determining whether the waste is excluded, then if listed, and finally if characteristic. Determining whether a waste is hazardous under RCRA (Resource Conservation and Recovery Act) can be done through one of the following methods:

Testing

Test the waste according to the methods set forth in subpart C of HAR 11-261.

Knowledge

Collecting a representative sample of the bulk C&D waste or excavated soil waste is crucial to characterizing environmental samples. If a sample is not representative, there are legal and environmental consequences. Each generator would be responsible for its own sampling plan. We advise contractors to work with experienced environmental companies and labs for guidance and implementation.

Note - Construction wastes with lead-based paint may be exempt from HAR §11-262-11. Provided wastes:

were from a residential structure; and from renovation, remodeling or abatement work; and contain no other listed constituents – refer to HAR §§11-261-20 and 11-261-30.

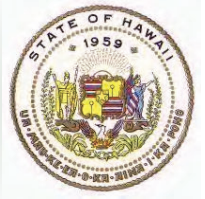
- ◆ In some cases, a generator can use his/her knowledge of a waste to make a determination as to whether the waste is a characteristic hazardous waste. In order to use knowledge to characterize the waste, the generator must consider the raw materials that constitute the waste or the **process(es)** that result in the waste being generated.

In considering the materials that make up the waste, the generator needs to examine the specific chemical and physical characteristics of the waste material. Information such as Material Safety Data Sheets (MSDSs) can be a helpful resource. However, while MSDSs can provide useful information regarding ignitability (flash point), corrosivity (pH), and reactivity, they tend to be less useful when it comes to identifying the toxic characteristics of waste. MSDSs are not required to list all of the ingredients in a certain material, but only those that make up greater than 1% of the total constituents of that material. This means that a waste may contain a toxic constituent exceeding the regulatory limit (making it a hazardous waste), but this constituent may not necessarily be included on the MSDS. Generators should also be aware that MSDSs are representative of raw materials; the MSDS may not accurately represent a waste material that is generated by the use of a particular raw material.



Construction & Demolition (C&D) Waste Disposal

State of Hawaii, Department of Health



2013

Knowledge

In considering the **process** that generates the waste, the generator needs to ask himself/herself: How does the operation/process affect the waste? For example, does the process make the waste ... more concentrated? ... more dilute?... contain free liquids?... become contaminated? ...etc.

One critical factor in using knowledge to characterize waste is that the knowledge must be applied appropriately. In other words, the knowledge that is applied must be valid and verifiable. A generator should not just assume that a waste is non-hazardous without providing some type of supporting, verifiable information to justify that conclusion. Using knowledge of the waste to conduct a hazardous waste determination involves a well thought out process in which the waste materials or the process generating the waste are considered. It should be noted that, more often than not, it is easier to use knowledge of the waste to characterize it as hazardous than it is to characterize it as non-hazardous.

- ◆ In many cases knowledge alone is inadequate to properly characterize the waste, specifically in those cases where the waste is cross-contaminated or inherently non-homogeneous. If you are generating a waste and your knowledge of the waste is insufficient to completely and accurately characterize it, you will need to get the waste tested by a lab that is certified to perform the tests that need to be conducted on the waste. Generators that use knowledge of process in waste determinations must be able to demonstrate the basis for their claim.
- ◆ An initial characterization must be done on each waste stream and a re-characterization must be performed at least every twelve months, or whenever there is a process change. It is recommended that MSDSs and other "knowledge of process" information be specifically reviewed during re-characterizations to ensure that neither the raw materials nor the process associated with the waste have changed.
- ◆ According to [40 CFR 262.40](#), a generator must keep records of any test results, waste analysis, or other determinations made in accordance with 40 CFR 262.11 for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal. Generators that use knowledge of process in waste determinations must be able to demonstrate the basis for this claim.

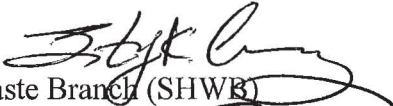
Appendix 3: Cover Letter (October 6, 2017)

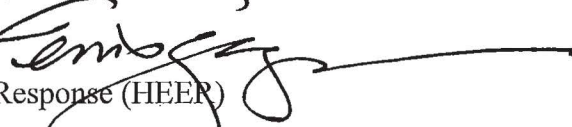


STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File: RB-261-2017

Date: October 6, 2017

To: Steve Chang, Chief
Solid and Hazardous Waste Branch (SHWB) 

Fenix Grange, Program Manager
Hazard Evaluation and Emergency Response (HEER) 

Through: Lene Ichinotsubo, Supervisor
SHWB - Solid Waste Section

Paul Kalaiwa'a, Acting Supervisor
SHWB - Hazardous Waste Section

Steve Mow, Supervisor
HEER Site Discovery & Response

Kathy Ho, Deputy Attorney
HEER

Wade Hargrove, Deputy Attorney
SHWB

From: Roger Brewer, PhD
Hazard Evaluation and Emergency Response

Subject: Updates to joint, HEER-SHWB 2011 document *Guidance for the Evaluation of Imported and Exported Fill Material, Including Contaminant Characterization of Stockpiles*

This technical memorandum serves as a cover letter to the October 2017 update of the joint, HEER-SHWB document *Guidance for the Evaluation of Imported and Exported Fill Material, Including Contaminant Characterization of Stockpiles* ("Clean Fill" guidance). The document was re-titled *Guidance for Soil Stockpile Characterization and Evaluation of Imported and Exported Fill Material* as part of the 2017 update. Signature by the above recipients denotes concurrence with these updates.

The 2011 version of the Clean Fill guidance document was updated to clarify issues related to the following topics:

1. Removal of lead-based paint striping for asphalt to be used as inert fill material; and
2. Discussion of salinity concerns related to the reuse of dredged sediment from coastal areas; and
3. Clarification on use of HDOH Tier 1 Soil Environmental Action Levels for unrestricted land (Tier 1 EALs) use as part of the hazardous waste determination process.

The need to remove lead-based paint from asphalt to be recycled for unrestricted reuse includes input from Solid Waste Section Supervisor and is relatively straight forward, as are added notes

regarding plant toxicity concerns for dredge material that has a high salinity. Refer to the updated guidance document for additional information.

Use of HDOH Tier 1 EALs (HDOH 2016a) as part of the hazardous waste determination process is based on the following points (see Figure 1):

1. HDOH soil Tier 1 EALs, in use and regularly updated since 1995, are protective of human health and the environment under any land use scenario, including use for residences, parks and schools, and are also protective of leaching and potential impacts to underlying groundwater;
2. A conclusion by the HEER Office that “No Further Action” is required for a contaminated property that has been remediated to meet Tier 1 EALs is reasonably intended to relieve the property owner and/or responsible parties of further oversight by the state and allow unrestricted onsite and offsite use of the subject soil;
3. Consideration of soil that *exceeds* HDOH Tier 1 EALs to be “polluted” under HRS § 342-H and meets the intent of that statute;
4. A requirement that Toxicity Characteristics Leaching Procedure (TCLP) test data be included as part of a hazardous waste determination under HRS § 342-J for disposal and/or offsite reuse of soil that exceeds HDOH Tier 1 EALs is reasonable and meets the intent of that statute (TCLP test not required if concentration of chemical is less than twenty-times the TCLP level; Table 1);
5. Soil that is not classifiable as a hazardous waste under HRS § 342-J by meeting the “20X” *di minimis* concentration limit or by meeting TCLP limits for disposal at a municipal landfill can still exceed HDOH Tier 1 EALs and pose a potential risk to human health and the environment and must be managed accordingly (refer to Table 1).

Determinations regarding the potential risk to human health and the environment posed by chemicals in soil should be carried out in accordance with the HDOH guidance document *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater* and predicated on sample data collected in accordance with the HEER Office *Technical Guidance Manual* (<http://eha-web.doh.hawaii.gov/eha-cma/Org/HEER/>). Additional information is provided in the attached update to the HEER Office *Clean Fill* guidance.

Attachment:

October 2017 update to HEER “Clean Fill” guidance

Figure 1. Flow chart depiction of the hazardous waste determination process for soil that is exported or imported to properties overseen by the HEER Office.

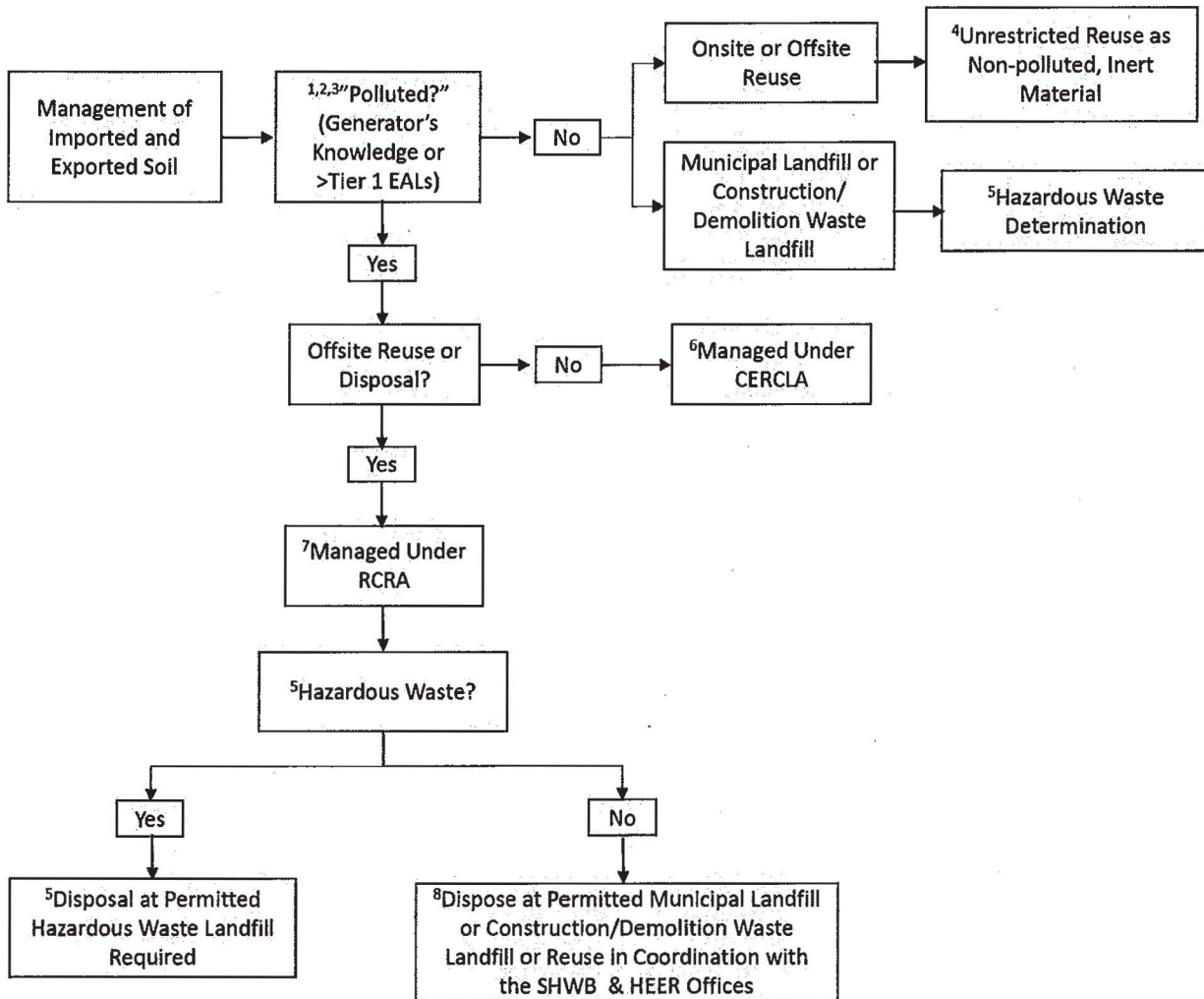


Figure 1 notes:

1. Imported or exported soil initially defined as a potential “waste” under HRS §342H-1 (Solid Waste Pollution). “Waste” defined as a “substance ... which may pollute the atmosphere, lands or waters or Hawaii.”
2. “Polluted” or “contaminated” soil defined as a soil with one or more potentially hazardous substances at a concentration that exceed HDOH Tier 1 EALs for unrestricted land use (HDOH 2016a; Tier 1 EALs for soil within 150m of a surface water body and situated over groundwater that is a source or potential source of drinking water).
3. Soil should be characterized in accordance with Decision Unit and Multi Increment Sample investigation methods described in the HEER *Technical Guidance Manual* (www.hawaiidoh.org) if testing is required due to insufficient generator knowledge of contamination potential.
4. “Inert Waste” includes “earth... which will not cause a leachate of environmental concern” (HAR §11-58.1, Solid Waste Management) *and* meets HDOH Tier 1 EALs for unrestricted land use.
5. Hazardous Waste Determination must include testing for Toxicity Characteristic Leaching Procedure if concentration of contaminant in soil (mg/kg) exceeds HDOH Tier 1 EALs for unrestricted land use *AND* is equal to or greater than 20 times the TCLP level (mg/L) for that chemical. TCLP data are not required as part of a hazardous waste determination if the concentration of the contaminant in soil is less than 20 times the TCLP level under any scenario. Soil cannot be disposed of at a municipal landfill or construction/demolition waste landfill if determined to be a hazardous waste under HAR §11-261 (Hazardous Waste Management). The soil must either be managed onsite under 128D through the HEER Office or disposed of at a permitted, hazardous waste landfill under the oversight of the SHWB.
6. Soil managed on-site under HRS §128-D (Environmental Response Law).
7. Soil managed for offsite reuse or disposal under HAR §11-261 (Environmental Response Law).
8. Offsite reuse of soil from a HEER project site that fails Tier 1 EALs for unrestricted land use but meets action levels for commercial/industrial land use *and* is not a hazardous waste must be carried out in coordination with the HEER Office and the Solid Waste Section of the SHWB. Land use restrictions and preparation of an Environmental Hazard Management for long-term management of the soil will be required under most circumstances.

Table 1. Comparison of HDOH Tier 1 EALs for chemicals with "20X" TCLP level.

USEPA Hazardous Waste Number	Contaminant	CAS No. 2	¹ Regulatory Level (mg/L)	² 20X Equivalent in Soil (mg/kg)	³ HDOH Tier 1 Soil EAL (mg/kg)
D004	Arsenic	7440-38 -2	5.0	100	23
D005	Barium	7440-39 -3	100.0	2,000	1000
D018	Benzene	71 -43 -2	0.5	10	0.30
D006	Cadmium	7440-43 -9	1.0	20	14
D019	Carbon tetrachloride	56 -23 -5	0.5	10	0.10
D020	Chlordane	57 -74 -9	0.03	0.6	17
D021	Chlorobenzene	108-90 -7	100.0	2,000	1.5
D022	Chloroform	67 -66 -3	6.0	120	0.026
D007	Chromium	7440-47 -3	5.0	100	1000
D023	o -Cresol	95 -48 -7	200	4,000	-
D024	m -Cresol	108-39 -4	200	4,000	-
D025	p -Cresol	106-44 -5	200	4,000	-
D026	Cresol		200	4,000	-
D016	2,4-D	94 -75 -7	10.0	200	0.34
D027	1,4-Dichlorobenzene	106-46 -7	7.5	150	0.055
D028	1,2-Dichloroethane	107-06 -2	0.5	10	0.023
D029	1,1-Dichloroethylene	75 -35 -4	0.7	14	1.1
D030	2,4-Dinitrotoluene	121-14 -2	0.13	2.6	0.024
D012	Endrin	72 -20 -8	0.02	0.4	3.8
D031	Heptachlor (and its epoxide)	76 -44 -8	0.008	0.16	0.071
D032	Hexachlorobenzene	118-74 -1	0.13	2.6	0.22
D033	Hexachlorobutadiene	87 -68 -3	0.5	10	0.041
D034	Hexachloroethane	67 -72 -1	3.0	60	0.023
D008	Lead	7439-92 -1	5.0	100	200
D013	Lindane	58 -89 -9	0.4	8.0	0.029
D009	Mercury	7439-97 -6	0.2	4.0	4.7
D014	Methoxychlor	72 -43 -5	10.0	200	16
D035	Methyl ethyl ketone	78 -93 -3	200.0	4,000	6.2
D036	Nitrobenzene	98 -95 -3	2.0	40	0.0053
D037	Pentachlorophenol	87 -86 -5	100.0	2,000	0.098
D038	Pyridine	110-86 -1	5.0	100	-
D010	Selenium	7782-49 -2	1.0	20	78
D011	Silver	7440-22 -4	5.0	100	78
D039	Tetrachloroethylene	127-18 -4	0.7	14	0.098
D015	Toxaphene	8001-35 -2	0.5	10	0.49
D040	Trichloroethylene	79 -01 -6	0.5	10	0.089
D041	2,4,5-Trichlorophenol	95 -95 -4	400.0	8,000	0.50
D042	2,4,6-Trichlorophenol	88 -06 -2	2.0	40	0.31
D017	2,4,5-TP (Silvex)	93 -72 -1	1.0	20	0.87
D043	Vinyl chloride	75 -01 -4	0.2	4.0	0.036

Table 1 notes.

1. Promulgated TCLP level for determination of soil as a hazardous waste. If the result of a TCLP test meets or exceeds the level noted for the subject chemical, then the soil is classified as a "hazardous waste" and cannot be disposed of in a municipal landfill or construction/demolition waste landfill.

2. Minimum concentration of the subject chemical that must be present in the soil (mg/kg) in order for the TCLP level (mg/L) to be potentially reached, assuming 100% extraction of the chemical from the soil during the TCLP leaching procedure. TCLP data are required for disposal of the soil at a municipal landfill or construction/demolition waste landfill if the concentration of the chemical in soil exceeds HDOH Tier 1 EALs for unrestricted land use AND is equal to or greater than twenty-times the TCLP level noted in the Table 1. TCLP data are not required for onsite or offsite reuse of soils that meet the Tier 1 EALs provided that characterization of the soil was carried out in accordance with the HEER Office *Technical Guidance Manual*.

3. HDOH Tier 1 Soil Environmental Action Level for unrestricted land use, including residential, schools, medical facilities, parks, etc., where children and other sensitive populations might be present on a regular basis.



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