

## **PERMIT PART 8      CORRECTIVE ACTION**

### **8.1      CORRECTIVE ACTION REQUIREMENTS UNDER THE CONSENT ORDER**

The Department and the Permittees have agreed to a Compliance Order on Consent (Consent Order) dated April 29, 2004, which requires the Permittees to conduct corrective action at all solid waste management units (SWMUs) and Areas of Concern (AOCs), at the Facility to fulfill the requirements of 40 CFR § 264.101. The Consent Order is an enforceable document pursuant to 40 CFR §§ 264.90(f), 264.110(c), and as defined in 40 CFR § 270.1(c)(7). Nothing in this Permit Part shall be construed to constitute a change to the Consent Order.

#### **8.1.1              Integration with Consent Order**

The Permittees shall conduct corrective action under this Permit (or other enforceable document) rather than the Consent Order, in the following circumstances:

1. New releases and newly discovered releases of hazardous waste or hazardous waste constituents from hazardous waste management units at the Facility;
2. At units undergoing closure and post closure care under 40 CFR Part 264, Subpart G, as they apply to Permitted Units at the Facility;
3. Implementation of the controls, including long-term monitoring, for any Solid Waste Management Unit (SWMU), Area of Concern (AOC), or hazardous waste management unit on Attachment K, Table K-3;
4. Releases of hazardous wastes or hazardous constituents that occur or are discovered after the date on which the Consent Order terminates.

(See § III.W.1 of the Consent Order).

The Permittees shall conduct corrective action as necessary to protect human health and the environment from any releases of hazardous waste or hazardous waste constituents pursuant to this Permit and in accordance with §§ 74-4-4(A)(5)(h) and (i) and 74-4-4.2(B) of the HWA and Section 3004(u) and (v) of RCRA, 42 U.S.C. § 6924(u) and (v) and 40 C. F. R. Part 264, Subparts F and G. Corrective action for releases from hazardous waste management units that commingle with releases originating from other sources undergoing corrective action under the Consent Order shall be conducted under the Consent Order. Any SWMU or AOC for which corrective action is required that is not subject to corrective action under the Consent Order shall be subject to corrective action under this Permit Part and 40 CFR §§ 264.100 and 264.101, which are incorporated herein by reference. The status of a SWMU or AOC will be indicated through placement in the appropriate Table in Permit Attachment K following the Class 3 permit modification process as specified in Permit Section 8.7.

### **8.2      GENERAL REQUIREMENTS**

#### **8.2.1              Identification and Status of SWMUs, AOCs and Hazardous Waste**

## **Management Units**

Permit Attachment K, Table K-1 (SWMUs and AOCs Requiring Corrective Action under the Consent Order) lists the SWMUs and AOCs at the Facility for which corrective action is required under the Consent Order; Attachment K, Table K-2 (SWMUs and AOCs Requiring Corrective Action under the Permit) identifies the SWMUs, AOCs, and hazardous waste management units for which corrective action is required under this Permit. Table K-1 will be modified as appropriate to include any newly identified SWMUs, AOCs, and releases from hazardous waste management units for tracking purposes. Releases not associated with SWMUs or hazardous waste management units will be designated as AOCs on Tables K-1 and K-2. Attachment K, Table K-3 (Corrective Action Complete with Controls) lists the SWMUs, AOCs, and hazardous waste management units for which corrective action is complete with controls.

Permit Attachment K, Table K-4 (Corrective Action Complete without Controls) provides a listing of the SWMUs, AOCs, and hazardous waste management units for which corrective action is complete without controls and that do not require monitoring.

Attachment J, Tables J-1.1, J-1.2, J-2, and J-3, list the hazardous waste management units at the Facility and their status (e.g., permitted, under post-closure care, closed). A map showing the locations of SWMUs and AOCs at the Facility is presented in Figure 52.

## **8.3 GENERAL CONDITIONS**

### **8.3.1 Corrective Action Beyond the Facility Boundary**

The Permittees shall notify the Department, orally and in writing in accordance with Permit Section 1.9.9.4, upon discovering that a release of hazardous waste or hazardous constituents has migrated beyond the Facility boundary or has the potential to migrate beyond the Facility boundary.

In the event that hazardous waste or hazardous constituents migrate beyond the Facility boundary, the Permittees shall implement corrective action beyond the Facility boundary as necessary to protect human health and the environment, unless the Permittees demonstrate to the Department that, despite the Permittees' best efforts, the Permittees are unable to obtain the necessary permission to undertake such actions. The Permittees are not relieved of any responsibility to clean up a release that has migrated beyond the Facility boundary where off-site access has been denied. On-site measures to address such releases shall be taken, to be determined on a case-by-case basis (*see* 40 CFR § 264.101(c)).

### **8.3.2 Off-Site Access**

To the extent that any corrective action requirement of this Permit requires access to property not owned or controlled by the Permittees, the Permittees shall use their best efforts to obtain access from the present owners of such property to conduct the required activities and to request the present owners allow the Department access to such property to oversee such activities. In the event that the Permittees do not obtain such access, the Permittees shall notify the Department in writing regarding its best efforts and its failure to obtain such access.

### **8.3.3 Newly Discovered Releases**

The Permittees shall notify the Department, orally and in writing in accordance with Permit Section 1.9.9.3., upon discovery of any previously unknown release of hazardous waste or hazardous constituents into soil, sediment, surface water, or groundwater. The Department may determine that further investigation of the release is needed. The Department may also determine that corrective action is needed to address the release. If the Department makes such a determination, it will notify the Permittees in writing.

### **8.3.4 Field Activities**

The Permittees shall notify the Department in writing of any field sampling or other field activities undertaken pursuant to any corrective action requirement of this Permit, and shall allow the Department to collect split samples upon request of the Department. For such sampling or other field activities, the Permittees shall notify the Department no less than 15 days prior to the commencement of such sampling.

### **8.3.5 Health and Safety Plans**

The Permittees shall prepare Health and Safety Plans for all field activities undertaken pursuant to any corrective action requirement of this Permit.

Health and Safety Plans shall include:

1. A description of the area near the planned field activity;
2. A description of the known hazards and evaluation of the risks associated with each activity conducted, including, but not limited to, on and off-site exposure to contaminants during implementation of interim or final corrective measures, site characterization, or monitoring activities;
3. A list of key personnel and alternates who are responsible for site safety, response operations, and protection of public health;
4. A delineation of the work area;
5. A description of levels of protection to be worn by personnel in the work area;
6. Procedures established to control site access;
7. Decontamination procedures for personnel and equipment;
8. Site emergency procedures;
9. Emergency medical care procedures for injuries and toxicological problems;
10. Requirements for an environmental field-monitoring program if applicable;
11. Routine and special training requirements for responders if applicable; and
12. Procedures for protecting workers from weather-related problems.

Health and Safety Plans shall be in accordance with:

1. National Institute of Occupational Safety and Health (NIOSH) Occupation Safety and
2. Health Guidance Manual for Hazardous Waste Site Activities (1985); and

3. Applicable requirements in Occupational Safety and Health Administration regulations, particularly 29 CFR § 1910 and 1926.

### **8.3.6 Recordkeeping**

The Permittees shall maintain all monitoring data, including sampling procedures, records of field measurements, laboratory analytical data, quality assurance/quality control documents, chain-of-custody records, well completion reports and periodic monitoring reports in the Facility Operating Record for a minimum of three years after the end of the operating life of the Facility and a minimum of three years after the end of any post-closure care periods.

## **8.4 CLEANUP LEVELS**

The Department and the New Mexico Water Quality Control Commission (WQCC) have separately specified certain cleanup goals and methods of calculating cleanup levels. The Department has also specified certain reporting requirements for sites where corrective action is required in response to releases to the environment. In general, the Department has selected a human health target risk level of  $10^{-5}$  for carcinogenic substances and a Hazard Index (HI) of 1.0 for non-carcinogenic substances as cleanup goals for establishing site-specific cleanup levels for one or more contaminants for which toxicological data are published. The Permittees shall follow the cleanup and screening levels described in this Permit Part in implementing the corrective action requirements of this Permit. In addition, cleanup levels for the protection of the environment shall address ecological risk consistent with the Department's guidance for assessing ecological risk as specified in Permit Section 8.5.

### **8.4.1 Groundwater Cleanup Levels**

The cleanup levels for all contaminants in groundwater shall be the WQCC groundwater quality standards, 20.6.2.3103 NMAC, the cleanup levels for toxic pollutants calculated in accordance with 20.6.2.7.WW NMAC, and the drinking water maximum contaminant levels (MCLs) adopted by EPA under the federal Safe Drinking Water Act (42 U.S.C. §§ 300f to 300j-26) or the New Mexico Environmental Improvement Board (EIB), 20.7.10 NMAC. If both a WQCC water quality standard and an MCL have been established for an individual substance, then the lower of the levels shall be the cleanup level for that substance. The WQCC standards apply to the dissolved portion of contaminants with the exception of mercury, organic compounds, and non-aqueous phase liquids. Mercury, organic compounds, and non-aqueous phase liquids shall be evaluated based on total, unfiltered concentrations; EPA MCL standards shall apply to the total unfiltered concentrations.

The most recent version of NMED's Tap Water Screening Levels listed in Table A-1 of Technical Background Document for Development of Soil Screening Levels (as updated) shall be used to establish the cleanup level if either a WQCC standard or an MCL has not been established for a specific substance. In the absence of an NMED tap water screening level then the EPA Regional Screening Levels for Chemical Contaminants at Superfund Sites (RSLs) for tap water shall be used. If no WQCC groundwater standard or MCL has been established for a contaminant for which toxicological information is published, the Permittees shall use a target excess cancer risk level of  $10^{-5}$  for carcinogenic substances and a HI of 1.0 for non-carcinogenic substances as the basis for proposing a cleanup level for the contaminant. If the background concentration of an

inorganic constituent, as established in accordance with Permit Section 8.10.6, exceeds the standard then the cleanup level is the background concentration for that specific substance. Any cleanup level based on a risk assessment must be submitted to the Department for its review and approval.

The Permittees shall give notice by e-mail to persons on the e-mail notification list in accordance with Permit Section 1.17.2.2 of a submittal to the Department under this Permit Section (8.4.1).

#### **8.4.2 Soil and Sediment**

The cleanup levels for soil and sediments shall be the cleanup levels for soil set forth in Permit Section (8.4.3). Should the Permittees be unable to achieve the Soil Cleanup Levels established under Permit Section 8.4.3, they shall conduct risk assessments in accordance with Permit Sections 8.10.4 and 8.10.5. Any cleanup level based on a risk assessment must be submitted to the Department for its review and approval.

#### **8.4.3 Soil Cleanup Levels**

The Department has specified soil-screening levels that are based on a target total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target HI of 1.0 for residential, industrial land use, and the construction worker scenarios. If the potential for migration to groundwater is applicable for a site, the Department may determine that a dilution attenuation factor (DAF) of one or greater, as calculated using the Department-approved methods, for contaminated soils is appropriate to achieve clean closure. This approach may apply at sites where the migration of contaminants through the soil column to groundwater has occurred or when the Department determines that the potential exists for migration of contaminants through the soil column to groundwater. Soil cleanup levels shall be the target soil screening levels listed in the Department's Technical Background Document for Development of Soil Screening Levels (as updated). If a Department soil screening level has not been established for a substance for which toxicological information is published, the soil cleanup level shall be established using the most recent version of the EPA RSL for residential and industrial soil for compounds designated as "n" (non-carcinogen effects) or ten times the EPA RSL for compounds designated "c" (carcinogen effects). The cumulative risk shall not exceed a total excess cancer risk of  $10^{-5}$  for carcinogenic substances and, for non-carcinogenic substances, a target HI of 1.0 at sites where multiple contaminants are present.

If the current and reasonably foreseeable future land use is one for which the Department has not established soil screening levels, the Permittees may propose cleanup levels to the Department based on a risk assessment and a target excess cancer risk level of  $10^{-5}$  for carcinogenic substances or an HI of 1.0, based on current and reasonably foreseeable future land use (e.g., residential, recreational, industrial, construction worker).

#### **8.4.4 Soil Cleanup Levels for Polychlorinated Biphenyls**

The soil cleanup level for PCBs is either a default concentration of 1 milligram per kilogram (mg/kg) for total PCBs or a risk-based PCB concentration level established through performing a health risk assessment using a target excess cancer risk level of  $10^{-5}$  for carcinogenic substances

or an HI of 1.0. (NMED Risk-based Remediation of Polychlorinated Biphenyls at RCRA Corrective Action Sites (as updated)).

#### **8.4.5 Surface Water Cleanup Levels**

The Permittees shall comply with the surface water quality standards outlined in the Clean Water Act (33 U.S.C. §§ 1251 to 1387), the New Mexico WQCC Regulations (20.6.2 NMAC), and the State of New Mexico Standards for Interstate and Intrastate Surface Waters (20.6.4 NMAC).

### **8.5 ECOLOGICAL RISK EVALUATION**

Screening for ecological risk shall be conducted using U.S. EPA's ECO-SSLs with the Department approval. The Permittees shall derive a screening level using the methodology in the Department's Guidance for Assessing Ecological Risks Posed by Chemicals: Screening-Level Ecological Risk Assessment (as updated). Ecological risk at each site shall be evaluated in a manner consistent with the Department's Guidance for Assessing Ecological Risks Posed by Chemicals: Screening-Level Ecological Risk Assessment (as updated) and, if appropriate, Assessing Ecological Risks Posed by Radionuclides: Screening-Level Radioecological Risk Assessment (as updated). Provided that any changes to the document are approved in advanced by the Department, procedures in the document Predictive Ecological Risk Assessment Methodology, Environmental Restoration Project, Sandia National Laboratories, NM, developed by Sandia National Laboratories/New Mexico may be used instead of the ecological screening levels cited in the guidance above. If no scientifically valid toxicological studies exist for a particular receptor and/or contaminant, the contaminant and receptor combination shall be addressed using qualitative methods.

### **8.6 VARIANCE FROM CLEAN-UP LEVELS**

The Permittees may seek a variance from a particular cleanup level in accordance with this Permit Section (8.6).

#### **8.6.1 Water Quality Standards**

For a cleanup level based on a water quality standard set by the WQCC, the Permittees may seek approval of an alternative abatement standard in accordance with the process specified in the WQCC Regulations, 20.6.2.4103.E and F NMAC.

#### **8.6.2 Other Cleanup Levels**

For all other cleanup levels, the Permittees may seek approval of a variance from a cleanup level by submitting to the Department a written request for a determination that attainment of the cleanup level is impracticable. The request must include a demonstration that attaining the cleanup level is technically or physically impossible or otherwise impractical using potential corrective action remedies. The request shall include, at a minimum, the following:

1. A discussion of the effectiveness of potential corrective action remedies;
2. A discussion of whether the proposed variance would result in a present or future hazard to public health or the environment;

3. Proposed alternate cleanup levels that are practical, based on potential corrective action remedies and a site-specific risk assessment;
4. All supporting documentation and analyses; and
5. Any other information requested by the Department.

If the Department approves the Permittees' impracticability demonstration, it will notify the Permittees in writing, and such notice will describe the specific action to be taken by the Permittees.

The Permittees shall give notice by e-mail to persons on the e-mail notification list of a request under this Permit Section (8.6.2), in accordance with Permit Section 1.17.2.2.

## **8.7 PERMIT MODIFICATION FOR CORRECTIVE ACTION COMPLETE**

The Permittees may submit to the Department a request for a Class 3 permit modification to change the status of a SWMU or AOC from "corrective action required" to "corrective action complete." The permit modification will move the SWMU or AOC from Attachment K (Listing of SMWUs and AOCs), Table K-1 (SWMUs and AOCs Requiring Corrective Action) to Attachment K, Table K-2 (Corrective Action Complete with Controls) or Attachment K, Table K-3 (Corrective Action Complete without Controls) pursuant to the terms of this Permit.

The Department's determination that corrective action is complete for a SWMU or AOC placed on either the Corrective Action Complete with Controls list or the Corrective Action Complete without Controls list will be subject to the Department's reservation of rights for new information or unknown conditions. In the event the Department seeks to require additional work at any SWMU or AOC contained on either of the two lists, the Department will initiate a permit modification to remove the SWMU or AOC from the corrective action complete lists.

### **8.7.1 Long-term Monitoring and Maintenance of SWMUs and AOCs**

The Permittees shall submit a Long-term Monitoring and Maintenance Plan as part of the permit modification request, as described in Permit Section 8.7, to change the status of a SWMU or AOC from corrective action required (i.e., listed in Attachment K, Table K-1) to corrective action complete with controls (i.e., listed in Attachment K, Table K-3). The Plan shall describe the combination of ongoing measures required to ensure protection of human health and the environment, such as maintenance of physical or institutional controls, monitoring of environmental media, or other measures. Upon approval, such plans shall be included in Attachment M (Long-term Monitoring and Maintenance Plans).

## **8.8 CORRECTIVE ACTION PROCEDURES**

The Permittees shall conduct corrective action at sites where releases of hazardous waste or hazardous constituents have occurred. If corrective action is necessary to protect human health or the environment, the Department will direct the Permittees to complete one or more of the requirements included in this Permit Section (8.8). The conditions listed below apply to all corrective action conducted under this Permit unless otherwise specified in Permit Part 6 (Closure Requirements).

## **8.8.1 Release Assessment**

### **8.8.1.1 Release Assessment Report**

If required by the Department, the Permittees shall submit a Release Assessment Report for newly discovered releases from any Permitted unit. Any revisions to the Release Assessment Report required by the Department shall be submitted within 90 calendar days of receipt of the Department's comments on the Release Assessment Report.

The Release Assessment Report shall, at a minimum, include the following information:

1. Location of unit(s) on a topographic map of appropriate scale, as required under 40 CFR § 270.14(b)(19);
2. Designation of type and function of unit(s);
3. General dimensions, capacities and structural description of unit(s) (supply any available plans/drawings);
4. Dates that the unit(s) was operated;
5. All available site history information;
6. Specifications of all wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous waste or hazardous constituents in the wastes; and
7. All available information pertaining to any release of hazardous waste or hazardous constituents from such unit(s) (to include ground water data, soil analyses, air, and surface water data).

### **8.8.1.2 Requirement to Proceed**

The Department will review the Release Assessment Report to determine whether any further investigative action is required. The Department will notify the Permittees of the need for confirmatory sampling, if necessary, or notify the Permittees that an Investigation Work Plan is required in accordance with the requirements in Permit Section 8.8.5.1. The Department will notify the Permittees of any corrective action complete decision.

## **8.8.2 Interim Measures**

### **8.8.2.1 Department-Initiated Interim Measures**

Upon written notification by the Department, the Permittees shall prepare and submit an Interim Measures (IM) Work Plan where the Department determines that interim measures are necessary to minimize or prevent the migration of hazardous waste or hazardous constituents and limit actual or potential human and environmental exposure to hazardous waste or hazardous constituents while long term corrective action remedies are evaluated and implemented. The Permittees shall submit its IM Work Plan to the Department within 90 calendar days of the Department's notification, unless another time period is specified by the Department. Such interim measures may be conducted concurrently with any required corrective action. The Permittees shall prepare



and submit IM Work Plans in accordance with the work plan format included in Permit Section 8.12 (Reporting Requirements).

The Permittees shall give notice by e-mail to persons on the e-mail notification list of a submittal made under this Permit Section (8.8.2.1), in accordance with Permit Section 1.17.2.2.

### **8.8.2.2 Permittee-Initiated Interim Measures**

The Permittees may initiate interim measures at a unit by notifying the Department, in writing, at least 30 calendar days prior to beginning the Interim Measures. The Department will approve the Permittees-initiated IM, conditionally approve the IM, or require submittal of an IM Work Plan for the Department approval prior to implementation of the IM.

The Permittees shall give notice by e-mail to persons on the e-mail notification list of a submittal made under this Permit Section (8.8.2.2), in accordance with Permit Section 1.17.2.2.

### **8.8.3 Emergency Interim Measures**

The Permittees may determine, during implementation of site investigation activities, that emergency interim measures are necessary to address an immediate threat of harm to human health or the environment. The Permittees shall notify the Department within one business day of discovery of the facts giving rise to the threat, and shall propose emergency interim measures to address the threat. If the Department approves the emergency interim measures in writing, the Permittees may implement the proposed emergency interim measures without submitting an IM Work Plan. If circumstances arise resulting in an immediate threat to human health or the environment such that initiation of emergency interim measures are necessary prior to obtaining written approval from the Department, the Permittees shall notify the Department within one business day of taking the emergency interim measure. The notification shall contain a description of the emergency situation, the types and quantities of contaminants involved, the emergency interim measures taken, and contact information for the emergency coordinator handling the situation. The notification shall also include a written statement justifying the need to take the emergency action without prior written approval from the Department. This requirement shall not be construed to conflict with 40 CFR §§ 264.1(g)(8) or 270.61.

The Permittees shall give notice by e-mail to persons on the e-mail notification list of a submittal made under this Permit Section (8.8.3), in accordance with Permit Section 1.17.2.2.

### **8.8.4 IM Work Plan Requirements**

The IM Work Plan shall ensure that the interim measures are designed to mitigate any current or potential threat(s) to human health or the environment and is consistent with, and integrated into, any final corrective measures at the Facility. The IM Work Plan shall include the interim measures objectives, procedures for implementation (including any designs, plans, or specifications), and schedules for implementation.

### **8.8.4.1 Interim Measures Implementation**

#### **8.8.4.1.i Implementation and Completion of Approved IM Work Plan**

The Permittees shall implement interim measures required under Permit Section 8.8.2 in accordance with the Department-approved IM Work Plan. The Permittees shall complete interim measures within 180 calendar days of the start of implementation of the interim measure. The Permittees may submit a written request to the Department to extend the period for implementation of the interim measure. The request must provide justification for the extension and a proposed schedule for completion of the interim measure. The Department will notify the Permittees, in writing, of the approval or disapproval of the request within 30 calendar days of receipt of the IM implementation extension request.

#### **8.8.4.1.ii Notification of Changes**

The Permittees shall give notice to the Department as soon as possible of any planned changes, reductions or additions to the IM Work Plan required by the Department under Permit Section 8.8.2.1 or initiated by the Permittees in accordance with Permit Section 8.8.2.2.

#### **8.8.4.1.iii Interim Measures Reports**

The Permittees shall submit to the Department for review and approval, within 90 calendar days of completion of interim measures, an IM Report summarizing the results of interim measure implementation. The IM Report shall contain, at a minimum, the following information:

1. A description of interim measures implemented;
2. Summaries of results;
3. Summaries of all problems encountered during IM investigations;
4. Summaries of accomplishments and/or effectiveness of interim measures; and,
5. Copies of all relevant laboratory/monitoring data, maps, logs, and other related information.

### **8.8.5 Corrective Action Investigations**

#### **8.8.5.1 Investigation Work Plan**

##### **8.8.5.1.i Investigation Work Plan Submittal**

The Permittees shall submit to the Department Investigation Work Plans for permitted or interim status units where the Department determines that corrective action is necessary to investigate releases to the environment.

##### **8.8.5.1.ii Investigation Work Plan Requirements**

Investigation Work Plans shall meet the requirements specified in Permit Section 8.12 (Reporting Requirements). Investigation Work Plans shall include schedules of implementation and completion of specific actions necessary to determine the nature and extent of contamination and the potential pathways of contaminant releases to the air, soil, surface water, and ground water. The Permittees shall provide sufficient justification and associated documentation that a release is not probable or has already been characterized if a unit or a media/pathway associated with a unit

(ground water, surface water, soil, subsurface gas, or air) is not included in an Investigation Work Plan. Such deletions of a unit, medium, or pathway from the work plan(s) are subject to the approval of the Department. The Permittees shall provide sufficient written justification for any omissions or deviations from the minimum requirements specified in Permit Section 8.12 (Reporting Requirements). Such omissions or deviations are subject to the approval of the Department. In addition, Investigation Work Plans shall include all investigations necessary to ensure compliance with 40 CFR § 264.101.

#### 8.8.5.1.iii Historical Documents

The Permittees shall submit to the Department a summary of the historical information and assessment of potential contaminant releases relating to each unit in conjunction with the unit-specific Investigation Work Plan including the most complete, legible, extant (i.e., existing) copies of all associated photographic imprints, maps, figures, drawings, tables, attachments, enclosures, appendices and other relevant supporting documentation. Such summaries shall be submitted as separate documents and not as part of the site-specific Investigation Work Plans.

#### 8.8.5.1.iv Investigation Work Plan Implementation

The Permittees shall implement Investigation Work Plans as approved by the Department. The Permittees shall notify the Department at least 15 days prior to any permit or corrective action-related field activity (e.g., drilling, sampling).

### **8.8.5.2 Corrective Action Investigation Reports**

The Permittees shall prepare and submit to the Department Investigation Reports for the investigations conducted in accordance with Investigation Work Plans submitted under Permit Section 8.8.5.1. The Permittees shall submit the Investigation Reports to the Department for review and approval in accordance with the schedules included in its approved Investigation Work Plans.

The Investigation Reports shall include an analysis and summary of all required investigations conducted under this Permit. The summary shall describe the type and extent of contamination at each unit investigated including sources and migration pathways, identify all hazardous waste or constituents present in all media, and describe actual or potential receptors. The Investigation Report shall also describe the extent of contamination (qualitative and quantitative) in relation to background levels for the area. If the Investigation Report concludes that further work is necessary, the report shall include a schedule for submission of a work plan for the next phase of investigation.

#### 8.8.5.2.i Cleanup Levels

The Investigation Reports shall identify the applicable cleanup levels in accordance with Permit Sections 8.4 through 8.6 for each hazardous waste or hazardous constituent found at each unit where corrective action is required. The Permittees shall propose in the Investigation Report or in a subsequent Risk Assessment or Corrective Measures Evaluation appropriate cleanup levels for those hazardous wastes or hazardous constituents without established cleanup levels based upon human and ecological risk.

#### 8.8.5.2.ii Requirement to Proceed

Based upon the Department's review of the Investigation Report, the Department will notify the

Permittees of the need for further investigative action, if necessary, and inform the Permittees, if not already notified, of the need for a Corrective Measures Evaluation. The Department will notify the Permittees if corrective action is complete. If the Department determines that further investigation is necessary, the Department will require the Permittees to submit a work plan for approval that includes a proposed schedule for additional investigation(s).

### **8.8.5.3 Risk Assessment**

The Permittees shall attain the cleanup goals outlined in Permit Sections 8.4 through 8.6. If the Department determines that the cleanup levels included in Permit Sections 8.4 and 8.5 cannot be achieved at a site, the Department will require performance of risk analyses to establish alternative cleanup levels. Such risk analyses shall be prepared in the format included in the Permit Section 8.12 (Reporting Requirements). The Permittees shall submit to the Department for approval a Risk Assessment Report in accordance with this Permit Section (8.8.5.3) according to the schedule set forth by the Department for sites where risk analyses are conducted.

### **8.8.6 Corrective Measures Evaluation**

#### **8.8.6.1 General**

The Department will require corrective measures at a unit if the Department determines, based on the Investigation Report and other relevant information available to the Department, that there has been a release of contaminants into the environment at the site and that corrective action is necessary to protect human health or the environment from such a release. Upon making such a determination, the Department will notify the Permittees in writing. The Department will specify a date for the submittal of the necessary reports and evaluations in the written notification.

#### **8.8.6.2 Corrective Measures Evaluation Report**

Following written notification from the Department that a corrective measures evaluation is required, the Permittees shall submit to the Department for approval a Corrective Measures Evaluation Report. The Permittees shall follow the Corrective Measures Evaluation Report format outlined in Permit Section 8.12 (Reporting Requirements). The corrective measures evaluation shall evaluate potential remedial alternatives and shall recommend a preferred remedy that will be protective of human health and the environment and that will attain the appropriate cleanup goals. The Corrective Measures Evaluation Report shall, at a minimum, comply with Permit Section 8.12 (Reporting Requirements) and include the following:

1. A description of the location, status, and current use of the site;
2. A description of the history of site operations and the history of releases of contaminants;
3. A description of site surface conditions;
4. A description of site subsurface conditions;
5. A description of on- and off-site contamination in all affected media;
6. An identification and description of all sources of contaminants;
7. An identification and description of contaminant migration pathways;

8. An identification and description of potential receptors;
9. A description of cleanup standards or other applicable regulatory criteria;
10. An identification and description of a range of remedy alternatives;
11. Remedial alternative pilot or bench scale testing results;
12. A detailed evaluation and rating of each of the remedy alternatives, applying the criteria set forth in Permit Section 8.6.4 including costs for long-term monitoring and maintenance (Reporting Requirements);
13. An identification of a proposed preferred remedy or remedies;
14. Design criteria of the selected remedy or remedies; and
15. A proposed schedule for implementation of the preferred remedy.

### **8.8.6.3 Cleanup Standards**

Following written notification from the Department that a corrective measures evaluation is required, the Permittees shall submit to the Department for approval a Corrective Measures Evaluation Report. The Permittees shall follow the Corrective Measures Evaluation Report format outlined in Permit Section 8.12 (Reporting Requirements). The corrective measures evaluation shall evaluate each of the remedy alternatives. The Permittees shall select corrective measures that are capable of achieving the clean-up standards and goals outlined in Permit Sections 8.4 through 8.6 (Clean-up Levels) including, as applicable, approved alternative clean-up goals established by a risk assessment.

### **8.8.6.4 Remedy Evaluation Criteria**

#### **8.8.6.4.i Threshold Criteria**

The Permittees shall evaluate each of the remedy alternatives for the following threshold criteria. To be selected, the remedy alternative must:

1. Be protective of human health and the environment;
2. Attain media cleanup standards;
3. Control the source or sources of releases so as to reduce or eliminate, to the extent practicable, further releases of contaminants that may pose a threat to human health and the environment; and
4. Comply with applicable standards for management of wastes.

#### **8.8.6.4.ii Remedial Alternative Evaluation Criteria**

The Permittees shall evaluate each of the remedy alternatives for the factors described in this Permit Section (8.8.6.4). These factors shall be balanced in proposing a preferred alternative.

#### **8.8.6.4.iii Long-term Reliability and Effectiveness**

The remedy shall be evaluated for long-term reliability and effectiveness. This factor includes consideration of the magnitude of risks that will remain after implementation of the remedy; the extent of long-term monitoring, or other management or maintenance that will be required after

implementation of the remedy; the uncertainties associated with leaving contaminants in place; and the potential for failure of the remedy. The Permittees shall give preference to a remedy that reduces risks with little long-term management, and that has proven effective under similar conditions.

#### 8.8.6.4.iv Reduction of Toxicity, Mobility, or Volume

The remedy shall be evaluated for its reduction in the toxicity, mobility, and volume of contaminants. The Permittees shall give preference to a remedy that uses treatment to more completely and permanently reduce the toxicity, mobility, and volume of contaminants.

#### 8.8.6.4.v Short-Term Effectiveness

The remedy shall be evaluated for its short-term effectiveness. This factor includes consideration of the short-term reduction in existing risks that the remedy would achieve; the time needed to achieve that reduction; and the short-term risks that might be posed to the community, workers, and the environment during implementation of the remedy. The Permittees shall give preference to a remedy that quickly reduces short-term risks, without creating significant additional risks.

#### 8.8.6.4.vi Implementability

The remedy shall be evaluated for its implementability or the difficulty of implementing the remedy. This factor includes consideration of installation and construction difficulties; operation and maintenance difficulties; difficulties with cleanup technology; permitting and approvals; and the availability of necessary equipment, services, expertise, and storage and disposal capacity. The Permittees shall give preference to a remedy that can be implemented quickly and easily, and poses fewer and lesser difficulties.

#### 8.8.6.4.vii Cost

The remedy shall be evaluated for its cost. This factor includes a consideration of both capital costs, and operation and maintenance costs. Capital costs shall include, without limitation, construction and installation costs; equipment costs; land development costs; and indirect costs including engineering costs, legal fees, permitting fees, startup and shakedown costs, and contingency allowances. Operation and maintenance costs shall include, without limitation, operating labor and materials costs; maintenance labor and materials costs; replacement costs; utilities; monitoring and reporting costs; administrative costs; indirect costs; and contingency allowances for the entire anticipated post-closure care or long term monitoring period. All costs shall be calculated based on their net present value. Permittees shall give preference to a remedy that is less costly, but does not sacrifice protection of health and the environment.

### **8.8.6.5 Approval of Corrective Measures Evaluation Report**

The Department will review and approve the Corrective Measures Evaluation Report in accordance with Permit Section 8.12.6. If the Department disapproves the Corrective Measures Evaluation Report, the Department will notify the Permittees in writing of the Corrective Measures Evaluation Report's deficiencies and specify a due date for submission of a revised Corrective Measures Evaluation Report. Upon receipt of such notification of disapproval, the Permittees shall submit to the Department, within the specified time, a revised Corrective Measures Evaluation Report that corrects the deficiencies. If the Department approves the Corrective Measures Evaluation Report, the Department will notify the Permittees in writing.

### **8.8.6.6 Relationship to Corrective Action Requirements**

The Corrective Measures Evaluation shall serve as a Corrective Measures Study for the purposes of RCRA compliance. (*See* 55 Fed. Reg. 30875-77 (July 27, 1990) (proposed 40 CFR §§ 264.520 through 264.524)).

### **8.8.6.7 Statement of Basis**

Upon approval of the Corrective Measures Evaluation Report, the Department will select a remedy or remedies for the unit. The Department may choose a different remedy from that recommended by the Permittees. The Department will issue a Statement of Basis for selection of the remedy, and will receive public comment on the remedy. The public comment period will extend for at least 45 days from the date of the public notice of the Statement of Basis. As provided in 20.4.1.901.A(5)(a)-(c) NMAC, the Department will provide an opportunity for a public hearing on the remedy, at which all interested persons will be given a reasonable chance to submit data, views or arguments orally or in writing and to examine witnesses testifying at the hearing. The comment period will automatically be extended to the close of the public hearing. The public hearing will follow the hearing requirements under section 20.4.1.901.F NMAC. The Department will select a final remedy and issue a response to public comments to all commenters, after the end of the public comment period. In selecting a remedy, the Department will follow the public participation requirements applicable to remedy selection under 40 CFR §§ 270.41 through 270.42 and 20.4.1.901 NMAC.

The administrative record for the Facility will be made available to the public for review at the Department's offices in Santa Fe, New Mexico. All significant written and signed comments, including e-mailed comments, will be considered by the Department prior to approving a final remedy or remedies.

The Department's decision on the final remedy or remedies shall follow the requirements under section 20.4.1.901 NMAC, Secretary's Decision. The Department will issue a response to public comments at the time of the Department's final decision.

### **8.8.7 Corrective Measures Implementation**

#### **8.8.7.1 General**

The Permittees shall implement the final remedy selected by the Department.

#### **8.8.7.2 Corrective Measures Implementation Plan**

Within 90 days after the Department's selection of a final remedy, or as otherwise specified by the schedule contained in the approved Corrective Measure Evaluation Report or as specified by a schedule required by the Department in the written approval notification, the Permittees shall submit to the Department for approval a Corrective Measures Implementation Plan outlining the design, construction, operation, maintenance, and performance monitoring for the selected remedy, and a schedule for its implementation. The implementation plan shall be submitted to the Department for review in accordance with the procedures in Permit Section 8.9. The Corrective Measures Implementation Plan shall, at a minimum, include the following elements:

1. A description of the selected final remedy;
2. A description of the cleanup goals and remediation system objectives;
3. An identification and description of the qualifications of all persons, consultants, and contractors that will be implementing the remedy;
4. Detailed engineering design drawings and systems specifications for all elements of the remedy;
5. A construction work plan;
6. An operation and maintenance plan;
7. The results of any remedy pilot tests;
8. A plan for monitoring the performance of the remedy, including sampling and laboratory analysis of all affected media;
9. A waste management plan;
10. A proposed schedule for submission to the Department of periodic progress reports; and
11. A proposed schedule for implementation of the remedy.

#### **8.8.7.3 Health and Safety Plan**

The Permittees shall conduct all activities in accordance with a site-specific or facility-wide Health and Safety Plan during all construction, operation, maintenance, and monitoring activities conducted during corrective measures implementation.

#### **8.8.7.4 Progress Reports**

The Permittees shall submit to the Department progress reports in accordance with the schedule approved in the Corrective Measures Implementation Plan. The progress reports shall, at a minimum, include the following information:

1. A description of the remedy work completed during the reporting period;
2. A summary of problems, potential problems, or delays encountered during the reporting period;
3. A description of actions taken to eliminate or mitigate the problems, potential problems, or delays;
4. A discussion of the remedy work projected for the next reporting period, including all sampling events;
5. Copies of the results of all monitoring, including sampling and analysis, and other data generated during the reporting period; and
6. Copies of all waste disposal records generated during the reporting period.



## **8.8.8 Remedy Completion**

### **8.8.8.1 Remedy Completion Report**

Within 90 days after completion of remedy, the Permittees shall submit to the Department a Remedy Completion Report. The report shall, at a minimum, include the following items:

1. A summary of the work completed;
2. A statement, signed by a registered professional engineer, or subject to approval by the Department, another competent person with appropriate expertise or professional certification, that the remedy has been completed in accordance with the Department approved work plan for the remedy;
3. As-built drawings and specifications signed and stamped by a registered professional engineer if applicable;
4. Copies of the results of all monitoring, including sampling and analysis, and other data generated during the remedy implementation, if not already submitted in a progress report;
5. Copies of all waste disposal records, if not already submitted in a progress report; and
6. A certification, signed by responsible officials of the Permittees (owner/operator), stating: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

### **8.8.9 Accelerated Clean-up Process**

If the Permittees identify a corrective action or measure that, if implemented voluntarily, will reduce risks to human health and the environment to levels acceptable to the Department, will reduce cost and/or will achieve cleanup of a SWMU, AOC or other contaminated location, ahead of schedule, the Permittees may implement the corrective measure as provided in this Permit Section (8.8.9), in lieu of the process established in Permit Section 8.8. The accelerated cleanup process shall be used at sites to implement presumptive remedies (*see* 61 Fed. Reg. 19432, 19439-40)(May 1, 1996) at small-scale and relatively simple sites where groundwater contamination is not a component of the accelerated cleanup, where the remedy is considered to be the final remedy for the site, and where the field work will be accomplished within 180 days of the commencement of field activities. The proposed accelerated cleanup will be documented in an Accelerated Corrective Measure Work Plan, which shall include:

1. A description of the proposed remedial action, including details of the unit or activity that is subject to the requirements of this Permit;
2. An explanation of how the proposed cleanup action is consistent with the overall corrective action objectives and requirements of this Permit;

3. The methods and procedures for characterization and remediation sample collection and analyses; and
4. A schedule for implementation and reporting on the proposed cleanup action.

The Permittees shall notify the Department of the planned accelerated corrective measure a minimum of 30 days prior to the commencement of any accelerated field activity. The notification shall include the submittal of the Plan if not already submitted to the Department.

The Permittees shall give notice by e-mail to persons on the e-mail notification list of a notification made under this Permit Section (8.8.9), in accordance with Permit Section 1.17.2.2.

#### **8.8.9.1 Accelerated Corrective Measures Work Plan**

The Permittees shall obtain approval of an Accelerated Corrective Measures Work Plan prior to implementation. The Permittees shall prepare the Work Plan in general accordance with the requirements of Permit Section 8.12 (Reporting Requirements). The Work Plan shall be submitted to the Department for review in accordance with the procedures in Permit Section 8.9. If the Department disapproves the Accelerated Corrective Measures Work Plan, the Department will notify the Permittees in writing of the Plan's deficiencies and specify a due date for submission of a revised Accelerated Corrective Measures Work Plan. The Permittees shall include an implementation schedule in the revised Accelerated Corrective Measures Work Plan.

#### **8.8.9.2 Accelerated Corrective Measures Implementation**

The Permittees shall implement the accelerated corrective measures in accordance with the approved Accelerated Corrective Measures Work Plan. Within 90 days of completion of the accelerated corrective measures, the Permittees shall submit to the Department for approval a Remedy Completion Report in a format approved by the Department in general accordance with Permit Section 8.12 (Reporting Requirements). If upon review, the Department identifies any deficiencies in the Remedy Completion Report, the Department will notify the Permittees in writing.

#### **8.8.10 Well Completion Report**

For each monitoring well or piezometer completed under this Permit, the Permittees shall submit to the Department a completion summary report within 90 days of completing installation which is to include a construction log and diagram, a boring log, and a development log. Installation shall be considered complete when all of the wells required under an investigation plan have been installed and their locations surveyed. The construction log and diagram and the boring log shall contain at a minimum the information required under Permit Section 8.11.

### **8.9 APPROVAL OF SUBMITTALS**

All documents shall be subject to the review and approval procedures described in Permit Section 1.14.

## **8.10 METHODS AND PROCEDURES**

The Permittees shall submit to the Department, for review and written approval, site-specific work plans for sites prior to the commencement of field activities where environmental investigation, corrective action, sampling or monitoring is being conducted or proposed. The site-specific work plans shall include the methods to be used to conduct all activities at each site or unit and shall be prepared in accordance with the format described in the Permit Section 8.12 (Reporting Requirements). The Permittees shall provide notification to the Department of corrective action field activities a minimum of 15 days prior to commencing the activity.

The methods used to conduct investigation, remediation, and monitoring activities shall be sufficient to fulfill the requirements of this Permit and provide accurate data for the evaluation of site conditions, the nature and extent of contamination and contaminant migration, and for remedy selection and implementation, where necessary. The methods presented in this Permit Section (8.10 et.seq.) are minimum requirements for environmental investigation and sampling, and are not intended to include all methods that may be necessary to fulfill the requirements of this Permit. In cases where alternative methods are required due to site conditions or contaminants, such methods will be specified in a site-specific work plan or other plan approved by the Department. The methods for conducting investigations, corrective actions, and monitoring at the Facility must be determined based on the conditions and contaminants that exist at each site or unit.

### **8.10.1 Standard Operating Procedures**

The Permittees shall provide a description of investigation, sampling or analytical methods and procedures in documents submitted to the Department that includes sufficient detail for the Department to evaluate the expected quality of the data that would be acquired using the methods and procedures. Facility standard operating procedures (SOPs) shall not be substituted for such descriptions, but may be used to augment the descriptions and must be provided to the Department upon request. If any requirement or procedure in SOP is found by the Department to be unacceptable for reasons including, but not limited to, the requirement or procedure will or could prevent the acquisition of representative and reliable sampling results, the requirement or procedure shall be replaced by the Permittees with a different requirement or procedure that is acceptable to the Department.

### **8.10.2 Investigation, Sampling, and Analysis Methods**

#### **8.10.2.1 Introduction and Purpose**

This Permit Section (8.10.2) provides minimum requirements for field investigations, sample collection, handling and screening procedures, field and laboratory sample analysis, and quality assurance procedures for samples of the medium being investigated or tested at the Facility.

The purpose of this Permit Section is to: 1) provide minimum requirements for drilling and sample collection in exploratory borings and other excavations; 2) provide minimum requirements for sampling of the target media; 3) provide minimum requirements for monitoring of groundwater and vadose zone conditions; and 4) identify minimum required screening, analytical, and quality assurance procedures that shall be implemented during field sampling activities and laboratory analyses.

The quality assurance procedures referenced in the previous paragraph include: 1) the Facility investigation data quality objectives; 2) the requirements for QA/QC to be followed during field investigations and by the analytical laboratories; and 3) the methodology for the review and evaluation of the field and laboratory QA/QC results and documentation.

#### **8.10.2.2 Field Exploration Activities**

Exploratory borings shall be advanced at locations specified in the Department approved site-specific work plans. The Department may require additional exploratory borings to fulfill the requirements of this Permit. Any additional boring locations, if required, will be determined or approved by the Department. The depths and locations of all exploratory and monitoring well borings shall be specified in the site-specific work plans submitted to the Department for approval prior to the start of the respective field activities.

#### **8.10.2.3 Sub-Surface Features/Utility Geophysical Surveys**

If required in an approved work plan, the Permittees shall conduct surveys to locate underground utilities, pipelines structures, drums, debris, and other buried features, including buried waste, in the shallow subsurface prior to the start of field exploration activities. The methods used to conduct the surveys, such as magnetometer, ground penetrating radar, resistivity, or other methods, shall be selected based on the characteristics of the site and the possible or suspected underground structures. The results of the surveys shall be included in the investigation reports submitted to the Department.

If required in an approved work plan, the Permittees shall conduct geophysical logging of boreholes using techniques such as acoustic televiewer, spinner flow, acoustic velocity/full wave form acoustic, density/porosity, gamma, neutron, single point resistance or electric (long/short normal or inductance) methods.

#### **8.10.2.4 Drilling and Soil, Rock, and Sediment Sampling**

##### **8.10.2.4.i Drilling**

Exploratory and monitoring well borings shall be drilled using the most effective, proven, and practicable method for recovery of undisturbed samples and potential contaminants. The Department shall approve the drilling methods selected for advancement of each boring prior to the start of field activities. Based on the drilling conditions, the borings shall be advanced using one of the following methods:

1. Hollow-stem auger;
2. Air rotary;
3. Mud rotary;
4. Percussion hammer;
5. Sonic;
6. Dual wall air rotary;
7. Direct Push Technology (DPT);

8. Cryogenic; and
9. Cable tool.

Hollow-stem auger or DPT drilling methods are preferred if vapor-phase or VOC contamination is known or suspected to be present. The type of drilling fluid used, if necessary, shall be approved by the Department prior to the start of drilling activities or prior to use at any site.

All drilling equipment shall be in good working condition and capable of performing the assigned task. Drilling rigs and equipment shall be operated by properly trained, experienced, and responsible crews. The Permittees are responsible for ensuring that contaminants from another site or facility are not introduced into the site under investigation due to malfunctioning equipment or poor site maintenance. The drilling equipment shall be properly decontaminated before drilling each boring.

Exploratory borings shall be advanced to unit- and location-specific depths specified or approved by the Department. The Permittees shall propose drilling depths in the site-specific work plans submitted for each subject area.

The Permittees shall notify the Department as early as practicable if conditions arise or are encountered that do not allow the advancement of borings to the depths specified by the Department or proposed in an approved work plan so that alternative actions may be discussed. Precautions shall be taken to prevent the migration of contaminants between geologic, hydrologic, or other identifiable zones during drilling and well installation activities. Contaminant zones shall be isolated from other zones encountered in the borings.

The drilling and sampling shall be accomplished under the direction of a qualified engineer or geologist who shall maintain a detailed log of the materials and conditions encountered in each boring. Both sample information and visual observations of the cuttings and core samples shall be recorded on the boring log. Known site features and/or site survey grid markers shall be used as references to locate each boring prior to surveying the location as described in Permit Section 8.10.2.5. The boring locations shall be measured to the nearest foot, and locations shall be recorded on a scaled site map upon completion of each boring.

Trenching and other exploratory excavation methods shall follow the applicable general procedures outlined in this Permit Section. The particular methods proposed for use by the Permittees for exploratory excavation and sampling at any specific unit shall be included in the site-specific investigation work plan submitted to the Department. The Department will include any changes or additional requirements for conducting exploratory excavation and sampling activities at the subject unit in its response to the Permittees after review of the investigation work plans.

Borings not completed as groundwater or vapor monitoring wells shall be properly abandoned in accordance with the methods listed in Permit Section 8.11.5 or other method approved by the Department. Borings completed as groundwater monitoring wells shall be constructed in accordance with the requirements described in Permit Section 8.11.3.2 (Well Construction Techniques).

#### 8.10.2.4.ii Soil and Rock Sampling

Relatively undisturbed discrete soil and rock samples shall be obtained, where possible, during the advancement of each boring for the purpose of logging, field screening, and analytical testing. Generally, the samples shall be collected at the following intervals and depths:

1. At 5-ft intervals, 10-ft intervals, continuously, or as approved by the Department;
2. At the depth immediately below the base of the disposal unit or facility structure;
3. At the maximum depth of each boring;
4. At the depths of contacts or first encounter, observed during drilling, with geologic units of different lithology, changes in structural or textural characteristics, or zones of relatively higher or lower permeability;
5. Of soil or rock types relatively more likely to sorb or retain contaminants than surrounding lithology;
6. At the depth of the first encounter, during drilling, with shallow or intermediate saturated zones;
7. At intervals suspected of being source or contaminated zones;
8. At the top of the regional aquifer; and
9. At other intervals approved or required by the Department.

The sampling interval for the borings may be modified, or samples may be obtained from a specific depth, based on field observations. A decontaminated split-barrel sampler lined with brass sleeves, a coring device, or other method approved by the Department shall be used to obtain samples during the drilling of each boring.

The following procedures should be followed if a split barrel sampler is used. Upon recovery of the sample, one or more brass sleeves shall be removed from the split barrel sampler and the open ends of the sleeves covered with Teflon tape or foil and sealed with plastic caps fastened to the sleeves with tape for shipment to the analytical laboratory. If brass sleeves are not used, a portion of the sample shall be placed in pre-cleaned, laboratory-prepared sample containers for laboratory chemical analysis. The remaining portions of the sample shall be used for logging and field screening, as described in Permit Sections 8.10.2.4.v and 8.10.2.4.vi, respectively.

Discrete samples shall be collected for field screening and laboratory analyses. Homogenization of discrete samples collected for analyses other than for VOC and SVOC analyses shall be performed by the analytical laboratory, if necessary. The Permittees may submit site-specific, alternative methods for homogenization of samples in the field to the Department for review and written approval.

Samples to be submitted for laboratory analyses shall be selected based on: 1) the results of the field screening or mobile laboratory analyses; 2) the position of the sample relative to groundwater, suspected releases, or site structures; 3) the sample location relative to former or altered site features or structures; 4) suspected migration pathways and the stratigraphy encountered in the boring; and 5) the specific objectives and requirements of this Permit and the approved site-specific work plan. The proposed number of samples and analytical parameters shall be included as part of the site-specific work plan submitted to the Department for approval prior to the start of

field investigation activities at each unit. The work plans shall allow for flexibility in modifying the project-specific tasks based on information obtained during the course of the investigation. Modifications to site-specific work plan tasks must be pre-approved in writing by the Department.

#### 8.10.2.4.iii Sediment Sampling

Sediment samples shall be collected in the same manner as described in Permit Section 8.10.2.4.ii for soil and rock sampling where borings are drilled to explore alluvial subsurface conditions. The sampling device shall be a decontaminated, hand-held stainless steel coring device, Shelby tube, thin-wall sampler, or other device approved by the Department where sediment sampling is conducted without the use of the drilling methods described in Permit Section 8.10.2.4.i. The samples shall be transferred to pre-cleaned laboratory prepared containers for submittal to the laboratory. Samples obtained for volatiles analysis shall be collected using Shelby tubes, thin-wall samplers, or other device approved by the Department. The ends of the samplers shall be lined with Teflon tape or aluminum foil and sealed with plastic caps fastened to the sleeves with tape for shipment to the analytical laboratory.

The physical characteristics of the sediment (such as mineralogy, ASTM soil classification, AGI (American Geological Institute) rock classification, moisture content, texture, color, presence of stains or odors, and/or field screening results), depth where each sample was obtained, method of sample collection, and other observations shall be recorded in the field log.

#### 8.10.2.4.iv Logging of Soil/Rock and Sediment Samples

Samples obtained from all exploratory borings and excavations shall be visually inspected and the soil or rock type classified in general accordance with ASTM D2487 (Unified Soil Classification System) and D2488, or AGI Methods for soil and rock classification. Detailed logs of each boring shall be completed in the field by a qualified engineer or geologist. Additional information, such as the presence of water-bearing zones and any unusual or noticeable conditions encountered during drilling shall be recorded on the logs. Field boring logs, test pit logs, and field well construction diagrams shall be converted to the format acceptable for use in final reports submitted to the Department. If requested, draft boring logs, test pit logs, and well construction diagrams shall be submitted to the Department for review within 30 days after the completion of each boring or monitoring well.

#### 8.10.2.4.v Soil, Rock, and Sediment Sample Field Screening

Samples obtained from borings shall be screened in the field for evidence of the potential presence of contaminants. Field screening results shall be recorded on the exploratory boring and excavation logs. Field screening results are used as a general guideline to determine the nature and extent of possible contamination. In addition, screening results shall be used to aid in the selection of soil, rock, sediment, and vapor-phase samples for laboratory analysis. The Department recognizes that field screening alone will not detect the possible presence or full nature and extent of all contaminants that may be encountered at the site.

The primary screening methods to be used shall include: 1) visual examination; 2) headspace vapor screening for VOCs; and 3) metals screening using X-ray fluorescence (XRF). Additional screening for site- or release-specific characteristics such as pH, High Explosives (HE), Total Petroleum Hydrocarbons (TPH), nitrates, or for other specific compounds using field test kits shall be conducted where appropriate.

Headspace vapor screening shall target VOCs and shall be conducted by placing a soil or rock sample in a plastic sample bag or a foil-sealed container allowing space for ambient air. The container shall be sealed and then shaken gently to expose the soil or rock to the air trapped in the container. The sealed container shall be allowed to rest for a minimum of five minutes while vapors equilibrate. Vapors present within the sample bag headspace will then be measured by inserting the probe of the instrument in a small opening in the bag or through the foil. The maximum value and the ambient air temperature shall be recorded on the field boring or test pit log for each sample. The monitoring instruments shall be calibrated each day to the manufacturer's standard for instrument operation. A photo-ionization detector (PID) equipped with a 10.6 or higher electron volt (eV) lamp, combustible gas indicator, or other instrument approved by the Department shall be used for VOC field screening. The limitations, precision, and calibration procedures of the instrument to be used for VOC field screening shall be included in the site-specific investigation work plan prepared for each unit.

XRF may be used to screen soil, rock, or sediment samples for the presence of metals. XRF screening requires proper sample preparation and proper instrument calibration. Sample preparation and instrument calibration procedures shall be documented in the field logs. The methods and procedures for sample preparation and instrument calibration shall be approved by the Department prior to the start of field activities. Field XRF screening results for selected metals may be used in lieu of laboratory analyses upon written approval by the Department; however, the results shall, at a minimum, be confirmed by laboratory analyses at a frequency of 20 percent (1 sample per every 5 analyzed by XRF analysis).

Field screening results are site- and boring-specific and the results vary with instrument type, media screened, weather conditions, moisture content, soil or rock type, and type of contaminant. The Permittees shall record on the field logs all conditions capable of influencing the results of field screening. The Permittees shall submit to the Department conditions potentially influencing field screening results as part of the site-specific investigation, remediation, or monitoring reports.

At a minimum, the Permittees shall submit the samples with the greatest apparent degree of contamination, based on field observations and field screening, for laboratory analysis. The Permittees shall also use the location of the sample relative to groundwater, stratigraphic units or contacts, and the proximity to significant site or subsurface features or structures as a guideline for sample selection. In addition, the Permittees shall submit the samples with no or little apparent contamination, based on field screening, for laboratory analysis if the intention is to confirm that the base (or other depth interval) of a boring or other sample location is not contaminated.

#### 8.10.2.4.vi Soil, Rock, and Sediment Sample Types

The Permittees shall collect soil, rock, and sediment samples at the frequencies outlined in the site-specific investigation, corrective action, or monitoring work plans for each unit, or other site submitted by the Permittees for review and written approval by the Department. The samples collected shall be representative of the media and site conditions being investigated or monitored. The Permittees shall collect QA/QC samples to monitor the validity of the soil, rock, and sediment sample collection procedures. Field duplicates will be collected at a rate of ten percent. The Permittees shall collect equipment blanks from all sampling apparatus at a frequency of ten percent of environmental samples if disposable sampling equipment is not used. The Permittees shall collect field blanks at a frequency of one per day for each medium (with the exception of air samples) at each unit, or other site. The resulting data will provide information on the variability



associated with sample collection, handling, and laboratory analysis operations. The blanks and duplicates shall be submitted for laboratory analyses associated with the project-specific contaminants, data quality concerns, and media being sampled.

#### **8.10.2.5 Sample Point and Structure Location Surveying**

The horizontal and vertical coordinates of the top of each monitoring well casing and the ground surface at each monitoring well location shall be determined by a registered New Mexico professional land surveyor in accordance with the State Plane Coordinate System (§§ 47-1-49 through 56 NMSA 1978)). The surveys shall be conducted in accordance with Sections 500.1 through 500.12 of the Regulations and Rules of the Board of Registration for Professional Engineers and Surveyors Minimum Standards for Surveying in New Mexico. Horizontal positions shall be measured to the nearest 0.1-ft, and vertical elevations shall be measured to the nearest 0.01-ft. The Permittees shall prepare site map(s), certified by a registered New Mexico professional land surveyor, presenting all surveyed locations and elevations including relevant site features and structures for submittal with well installation reports to the Department.

Site attributes (e.g., soil sample locations, sediment sample locations, springs, outfalls, pertinent structures, monitoring stations, as well as staked out sampling grids), shall be located by using a professional/mapping grade global positioning system (GPS), or another Department-approved surveying system, or by using a registered New Mexico Registered Land Surveyor using the methods described in the paragraph above. If using GPS, horizontal locations shall be measured to sub-meter accuracy. The Permittees shall provide the Department a statement of accuracy for survey data upon request.

#### **8.10.2.6 Subsurface Vapor-Phase Monitoring and Sampling**

Samples of subsurface vapors shall be collected from vapor monitoring points from both discrete zones, selected based on investigation and field screening results, and as total well subsurface vapor samples where required by the Department. Subsurface vapor samples shall be collected using methods approved by the Department that will produce reliable and representative results from the zones subject to investigation or monitoring.

During subsurface drilling explorations at sites where there is a potential for vapor-phase contamination to be present, soil gas samples shall be obtained at the Department-approved intervals for field screening and/or laboratory analyses. Soil-vapor sampling techniques during borehole drilling must be proposed in the work plan and approved by the Department. The data shall be logged and also used for determining the samples to be sent to an analytical laboratory.

The Permittees shall, as specified in the work plan and approved by the Department, collect vapor samples for field measurement of some or all of the following during subsurface vapor monitoring activities:

1. Percent oxygen;
2. Organic vapors (using a photo-ionization detector with an 10.6 or higher eV (electron volt) lamp, a combustible vapor indicator or other method approved by the Department);
3. Percent carbon dioxide;
4. Static subsurface pressure; and

5. Other parameters (such as carbon monoxide and hydrogen sulfide) as required by the Department.

The Permittees also shall collect vapor samples for laboratory analysis of the following as required:

1. Percent moisture;
2. VOCs; and
3. Other analytes required by the Department.

Vapor samples analyzed by the laboratory for percent moisture and VOCs shall be collected using SUMMA canisters or other sample collection method approved by the Department. The samples shall be analyzed for VOC concentrations by EPA Method TO-14A, as it may be updated or by an equivalent VOC analytical method such as TO-15.

Field vapor measurements, the date and time of each measurement, and the instrument used shall be recorded on a vapor monitoring data sheet. The instruments used for field measurements shall be calibrated daily in accordance with the manufacturer's specifications and as described in Permit Section 8.10.2.12. The methods used to obtain vapor-phase field measurements and samples shall be approved by the Department in writing prior to the start of air monitoring at each Facility site where vapor-phase monitoring is conducted.

#### **8.10.2.7 Groundwater Monitoring**

##### **8.10.2.7.i Groundwater Levels**

Groundwater level measurements shall be obtained at intervals required by the Department. Groundwater levels also shall be obtained prior to purging in preparation for a sampling event. Measurement data and the date and time of each measurement shall be recorded on a site monitoring data sheet. The depth to groundwater shall be measured to the nearest 0.01 feet. The depth to groundwater shall be recorded relative to the surveyed well casing rim or other surveyed datum.

Groundwater levels shall be measured in all wells at the facility (or the number of wells otherwise specified in a Department approved groundwater monitoring work plan) within 14 days of the commencement of the monitoring activities. The Permittees shall conduct periodic measuring events, the schedule for which shall be provided in the groundwater monitoring work plans.

#### **8.10.2.8 Groundwater Sampling**

Groundwater samples shall initially be obtained from newly installed monitoring wells between ten and 30 days after completion of well development or during the next scheduled sampling event for that site for wells installed at a site with existing wells. Groundwater monitoring and sampling shall be conducted at an interval approved by the Department after the initial sampling event. The Permittees shall sample all saturated zones screened to allow entry of groundwater into each monitoring well during each sampling event (or as otherwise specified in the Department approved groundwater monitoring work plan). All requests for variances from the groundwater sampling schedule shall be submitted to the Department, in writing, no less than 30 days prior to the start of scheduled monitoring and sampling events.

For exploratory borings subject to this Permit, groundwater samples shall be collected from all saturated zones, where possible, within exploratory borings not intended to be completed as monitoring wells prior to abandonment of the borings.

Water samples shall be analyzed for site-specific parameters in accordance with the Department-approved groundwater monitoring work plan. The analytical list may include, but is not limited to, one or more of the following general chemistry parameters as required by the Department:

|                       |          |           |           |
|-----------------------|----------|-----------|-----------|
| sulfate               | chloride | sodium    | magnesium |
| carbonate/bicarbonate | fluoride | manganese | calcium   |
| potassium             | sulfide  | bromide   |           |

#### 8.10.2.8.i Well Purging

All zones in each monitoring well shall be purged by removing groundwater prior to sampling and in order to ensure that formation water is being sampled. Purge volumes shall be determined by monitoring, at a minimum, groundwater pH, specific conductance, dissolved oxygen concentrations, turbidity, redox potential, and temperature during purging of volumes and at measurement intervals approved by the Department in writing. The groundwater quality parameters shall be measured using a flow-through cell and instruments approved by the Department in writing. The volume of groundwater purged, the instruments used, and the readings obtained at each interval shall be recorded on the field monitoring log. In general, water samples may be obtained from the well after the measured parameters of the purge water have stabilized to within ten percent for three consecutive measurements. Well purging may also be conducted in accordance with the Department's Position Paper "Use of Low-Flow and other Non-Traditional Sampling Techniques for RCRA Compliant Groundwater Monitoring" (October 30, 2001). The Permittees may submit, to the Department for approval, a written request for a variance from the described methods of well purging for individual wells no later than 90 days prior to scheduled sampling activities. The Department will respond to the request, in writing, within 60 days of receipt of the variance request.

#### 8.10.2.8.ii Groundwater Sample Collection

Groundwater samples shall be obtained from each well after a sufficient amount of water has been removed from the well casing to ensure that the sample is representative of formation water. Groundwater samples shall be obtained using methods approved by the Department within 24 hours of the completion of well purging or an adequate volume is available to sample. Sample collection methods shall be documented in the field monitoring reports. The samples shall be transferred to the appropriate, clean, laboratory-prepared containers provided by the analytical laboratory. Sample handling and chain-of-custody procedures are described in Permit Section 8.10.2.9. Decontamination procedures shall be established for reusable water sampling equipment as described in Permit Section 8.10.2.11.

All purged groundwater and decontamination water shall be temporarily stored at satellite accumulation areas, less-than-90-day storage areas or transfer stations in labeled 55-gallon drums or other containers approved by the Department until proper characterization and disposal can be

arranged. The methods for disposal of purge/decontamination water shall be approved by the Department prior to removal from the temporary storage area. Disposable materials shall be handled as described in Permit Section 8.10.2.13.

Groundwater samples intended for metals analysis shall be submitted to the laboratory as total metals samples. If required by the Department, the Permittees shall obtain groundwater samples for dissolved metals analysis to be filtered using disposable in-line filters with a 0.45 micron or other mesh size approved by the Department.

#### 8.10.2.8.iii Surface Water Sample Collection

Surface water samples shall be collected using methods approved by the Department. Samples shall be collected in clean laboratory-prepared sampling containers. The methods and instruments used to measure field parameters shall be approved by the Department prior to conducting surface water sampling. The sampling and monitoring techniques used and the measurements obtained shall be recorded in the field monitoring reports.

#### 8.10.2.8.iv Groundwater and Surface Water Sample Types

Groundwater samples shall be collected from each monitoring well and surface water samples shall be collected at predetermined locations. Field duplicates, field blanks, equipment rinsate blanks, reagent blanks, if necessary, and trip blanks shall be obtained for quality assurance during groundwater and surface water sampling activities. The samples shall be handled as described in Permit Section 8.10.2.9.

Field duplicate surface water and groundwater samples shall be obtained at a frequency of ten percent. At a minimum, one duplicate sample per sampling event shall always be obtained.

Field blanks shall be obtained at a frequency of at least ten percent of the number of environmental VOC samples, with at least one field blank per analytical batch of samples. Field blanks shall be generated by filling sample containers in the field with deionized water and submitting the samples, along with the groundwater or surface water samples, to the analytical laboratory for the appropriate analyses.

Equipment rinsate blanks shall be collected at a rate of ten percent of environmental samples if disposable sampling apparatus is not used. Rinsate samples shall be generated by rinsing deionized water through decontaminated sampling equipment. The rinsate sample then shall be placed in the appropriate sample container and submitted with the groundwater or surface water samples to the analytical laboratory for the appropriate analyses.

Reagent blanks shall be obtained at a frequency of ten percent but no fewer than one per day per unit if chemical analyses requiring the use of chemical reagents are conducted in the field during water sampling activities.

Trip blanks shall accompany laboratory sample bottles and shipping and storage containers intended for VOC analyses. Trip blanks shall consist of a sample of analyte-free deionized water prepared by the laboratory and placed in an appropriate sample container. The trip blank shall be prepared by the analytical laboratory prior to the sampling event and shall be kept with the shipping containers and placed with other water samples obtained from the site each day. Trip blanks shall be analyzed for VOCs at a frequency of one for each shipping container of VOC samples.

### **8.10.2.9 Sample Handling**

At a minimum, the following procedures shall be used at all times when collecting samples during investigation, corrective action, and monitoring activities unless otherwise specified in a Department-approved work plan:

1. Neoprene, nitrile, or other protective gloves shall be worn when collecting samples. New disposable gloves shall be used to collect each sample;
2. All samples collected of each medium for chemical analysis shall be transferred into clean sample containers supplied by the project analytical laboratory with the exception of soil, rock, and sediment samples obtained in brass sleeves, Shelby tubes, thin wall samplers, or in Encore™ samplers. Upon recovery of the sample collected using split barrel samplers with brass sleeves, the brass sleeves shall be removed from the split barrel sampler and the open ends of the sleeves shall be lined with Teflon tape or foil and sealed with plastic caps. The caps shall be fastened to the sleeve with tape for storage and shipment to the analytical laboratory. Samples collected in Shelby tubes or thin wall samplers shall be capped in a similar fashion. The sample depth and the top of the sample shall be clearly marked. Sample container volumes and preservation methods shall be in accordance with EPA SW-846 and established industry practices for use by accredited analytical laboratories. Sufficient sample volume shall be obtained for the laboratory to complete the method-specific QC analyses on a laboratory-batch basis; and
3. Sample labels and documentation shall be completed for each sample following procedures included in the site-specific work plans approved by the Department. Immediately after the samples are collected, they shall be stored in a cooler with ice or other appropriate storage method until they are delivered to the analytical laboratory. Standard chain-of-custody procedures, as described in Permit Section 8.10.2.14.ii, shall be followed for all samples collected. All samples shall be submitted to the laboratory soon enough to allow the laboratory to conduct the analyses within the method holding times.

Shipment procedures shall include the following:

1. Individual sample containers shall be packed to prevent breakage and transported in a sealed cooler with ice or other suitable coolant or other EPA or industry-wide accepted method. The drainage hole at the bottom of the cooler shall be sealed and secured in case of sample container leakage.
2. Each cooler or other container shall be delivered directly to the analytical laboratory;
3. Glass bottles shall be separated in the shipping container by cushioning material to prevent breakage;
4. Plastic containers shall be protected from possible puncture during shipping using cushioning material;
5. The chain-of-custody form and sample request form shall be shipped inside the sealed storage container to be delivered to the laboratory;
6. Chain-of-custody seals shall be used to seal the sample-shipping container in conformance with EPA protocol; and

7. Signed and dated chain-of-custody seals shall be applied to each cooler prior to transport of samples from the site.

#### **8.10.2.10 In-Situ Testing**

In-situ permeability tests, remediation system pilot tests, stream flow tests, and other tests conducted to evaluate site and subsurface conditions shall be designed to accommodate specific site conditions and to achieve the test objectives. The testing methods shall be approved, in writing, by the Department prior to implementation. The tests shall be conducted in order to appropriately represent site conditions and in accordance with USGS, ASTM or other methods generally accepted by the industry. Detailed logs of all relevant site conditions and measurements shall be maintained during the testing events. If requested, a summary of the general test results, including unexpected or unusual test results and equipment failures or testing limitations shall be reported to the Department within 30 days of completion of the test. The summary shall be presented in a format acceptable to the Department and in general accordance with the report formats outlined in Permit Section 8.12 (Reporting Requirements). A report summarizing the results of each test shall be submitted to the Department within 120 days of completion of each test.

#### **8.10.2.11 Decontamination Procedures**

The objective of the decontamination procedures is to minimize the potential for cross-contamination. A designated decontamination area shall be established for decontamination of drilling equipment, reusable sampling equipment and well materials. The drilling rig shall be decontaminated prior to entering the site or unit. Drilling equipment or other exploration equipment that may come in contact with the borehole shall be decontaminated by steam cleaning, by hot-water pressure washing, or by other method approved by the Department prior to drilling each new boring.

Sampling or measurement equipment, including but not limited to, stainless steel sampling tools, split-barrel or core samplers, well developing or purging equipment, groundwater quality measurement instruments, water level measurement instruments, and reusable vapor sampling equipment shall be decontaminated in accordance with the following procedures or other applicable methods approved by the Department before each sampling attempt or measurement:

1. Brush equipment with a wire or other suitable brush, if necessary or practicable, to remove large particulate matter;
2. Rinse with potable tap water;
3. Wash with nonphosphate detergent or other detergent approved by the Department (examples include Fantastik™, Liqui-Nox®) followed by a tap water rinse;
4. Rinse with 0.1 molar nitric acid (to remove trace metals, if necessary) followed by a tap water rinse;
5. Rinse with methanol (to remove organic compounds, if necessary) followed by a tap water rinse;
6. Rinse with potable tap water; and
7. Double rinse with deionized water.

All decontamination solutions shall be collected and stored temporarily as described in Permit Section 8.10.2.13. Decontamination procedures and the cleaning agents used shall be documented in the daily field log.

#### **8.10.2.12 Field Equipment Calibration Procedures**

Field equipment requiring calibration shall be calibrated to known standards, in accordance with the manufacturers' recommended schedules and procedures. At a minimum, calibration checks shall be conducted daily, or at other intervals approved by the Department, and the instruments shall be recalibrated, if necessary. Calibration measurements shall be recorded in the daily field logs. If field equipment becomes inoperable, its use shall be discontinued until the necessary repairs are made. In the interim, a properly calibrated replacement instrument shall be used.

#### **8.10.2.13 Collection and Management of Investigation Derived Waste**

Investigation derived waste (IDW) includes general refuse, drill cuttings, excess sample material, water (decontamination, development and purge), and disposable equipment generated during the course of investigation, corrective action, or monitoring activities. All IDW shall be properly characterized in accordance with 40 CFR Part 261 and Attachment C of this Permit, and shall be managed in accordance with all Federal, State, and local rules and regulations for storage, labeling, handling, transport, and disposal of waste. The Permittees shall include a description of anticipated management of IDW as part of the applicable work plan submitted to the Department for approval prior to an investigation or corrective action.

#### **8.10.2.14 Documentation of Field Activities**

##### **8.10.2.14.i General**

Daily field activities, including observations and field procedures, shall be recorded on appropriate forms. The original field forms shall be maintained at the Facility. Indelible ink shall be used to record all field activities. Photographic documentation of field activities shall be performed, as appropriate. The daily record of field activities shall include the following:

1. Site or unit designation;
2. Date;
3. Field investigation team members;
4. Weather conditions;
5. Daily activities and times conducted;
6. Observations;
7. Signature of personnel completing the field record.

The daily record of field activities shall also include the following, as applicable:

1. Record of samples collected with sample designations and locations specified;
2. Photographic log;

3. Field monitoring data, including health and safety monitoring if conditions arise that require modification of required work;
4. Equipment used and calibration records, if appropriate;
5. List of additional data sheets and maps completed;
6. An inventory of the waste generated and the method of storage or disposal; and
7. Names of visitors

#### 8.10.2.14.ii Sample Custody

All samples collected for analysis shall be recorded in the field report or data sheets. Chain-of-custody forms shall be completed at the end of each sampling day, prior to the transfer of samples off site, and shall accompany the samples during shipment to the laboratory. A signed and dated custody seal shall be affixed to the lid of the shipping container. Upon receipt of the samples at the laboratory, the custody seals will be broken, the chain-of-custody form shall be signed as received by the laboratory, and the conditions of the samples shall be recorded on the form. The original chain-of-custody form shall remain with the laboratory and copies shall be returned to the relinquishing party. The Permittees shall maintain copies of all chain-of-custody forms generated as part of sampling activities. Copies of the chain-of-custody records (either paper copies or electronically scanned in PDF format) shall be included with all draft and final laboratory reports submitted to the Department.

### 8.10.3 Chemical Analyses

The Permittees shall submit all samples for laboratory analysis to accredited contract laboratories. The laboratories shall use the most recent EPA and industry-accepted extraction and analytical methods for chemical analyses for target analytes as the testing methods for each medium sampled. The Permittees shall use the most sensitive laboratory methods (with the lowest detection limits) available unless specific conditions preclude their use.

The Permittees shall submit a list of analytes and analytical methods to the Department, for review and written approval as part of each site-specific investigation, corrective action, or monitoring work plan. The detection limits for each method shall be less than applicable background, screening, and regulatory cleanup levels. The preferred method detection limits are a maximum of 20 percent of the cleanup, screening, or background levels. Analyses conducted with detection limits that are greater than applicable background, screening, and regulatory cleanup levels shall be considered data quality exceptions and the reasons for the elevated detection limits shall be reported to the Department. All analytical data (non-detects, estimated concentrations, and detects) shall be included in an electronic copy of an investigation report in a format useable by the Department and with qualifiers as attached from the analytical laboratory. The summary tables shall include only detects (including estimated quantities) of the data based on the corresponding qualifiers. The Permittees shall not censor the data based on detection limits, quantitation limits, or measurement uncertainty.

#### 8.10.3.1 Laboratory QA/QC Requirements

The following requirements for laboratory QA/QC procedures shall be considered the minimum QA/QC standards for the laboratories employed by the Permittees that provide analytical services



for environmental investigation, corrective action, and monitoring activities conducted at the Facility. The Permittees shall provide the names of the contract analytical laboratories and copies of the laboratory quality assurance manuals to the Department within 90 days of awarding a contract for analytical services to any contract laboratory.

#### 8.10.3.1.i Quality Assurance Procedures

Contract analytical laboratories shall maintain internal quality assurance programs in accordance with EPA and industry-wide accepted practices and procedures. At a minimum, the laboratories shall use a combination of standards, blanks, surrogates, duplicates, matrix spike/matrix spike duplicates (MS/MSD), blank spike/blank spike duplicates (BS/BSD), and laboratory control samples to demonstrate analytical QA/QC. The laboratories shall establish control limits for individual chemicals or groups of chemicals based on the long-term performance of the test methods. In addition, the laboratories shall establish internal QA/QC that meets EPA's laboratory certification requirements. The specific procedures to be completed are identified in the following sections.

#### 8.10.3.1.ii Equipment Calibration Procedures and Frequency

The laboratories' equipment calibration procedures, calibration frequency, and calibration standards shall be in accordance with the EPA test methodology requirements and documented in the laboratories' quality assurance and SOP manuals. All instruments and equipment used by the laboratory shall be operated, calibrated, and maintained according to manufacturers' guidelines and recommendations. Operation, calibration, and maintenance shall be performed by personnel who have been properly trained in these procedures. A routine schedule and record of instrument calibration and maintenance shall be kept on file at the laboratory.

#### 8.10.3.1.iii Laboratory QA/QC Samples

Analytical procedures shall be evaluated by analyzing reagent or method blanks, surrogates, MS/MSDs, BS/BSDs, and laboratory duplicates, as appropriate for each method. The laboratory QA/QC samples and frequency of analysis to be completed shall be documented in the cited EPA or DOE test methodologies. At a minimum, the laboratory shall analyze laboratory blanks, MS/MSDs, BS/BSDs, and laboratory duplicates at a frequency of one in twenty for all batch runs requiring EPA test methods and at a frequency of one in ten for non-EPA test methods. Laboratory batch QA/QC samples shall be specific to the project.

#### 8.10.3.1.iv Laboratory Deliverables

The laboratory analytical data package submitted to the Department shall be prepared in accordance with EPA-established Level II analytical support protocol. The laboratory analytical data package kept on file at the Facility shall be prepared in accordance with EPA-established Level III or IV analytical support protocol. The following shall be provided by the contract analytical laboratories to the Permittees in the analytical laboratory reports submitted to the Permittees either electronically, magnetically or in hard (paper) copy for each project:

1. Transmittal letter, including information about the receipt of samples, the testing methodology performed, any deviations from the required procedures, any problems encountered in the analysis of the samples, any data quality exceptions, and any corrective actions taken by the laboratory relative to the quality of the data contained in the report;

2. Sample analytical results, including sampling date; date of sample extraction or preparation; date of sample analysis; dilution factors and test method identification; soil, rock, or sediment sample results in consistent units (mg/kg) or micrograms per kilogram in dry-weight basis; water sample results in consistent units (milligrams per liter or micrograms per liter ( $\mu\text{g/L}$ )); vapor sample results in consistent units (ppm or  $\mu\text{g/m}^3$ ); and detection limits for undetected analytes. Results shall be reported for all field samples, including field duplicates and blanks, submitted for analysis;
3. Method blank results, including detection limits for undetected analytes;
4. Surrogate recovery results and corresponding control limits for samples and method blanks (organic analyses only);
5. MS/MSD and/or BS/BSD spike concentrations, percent recoveries, relative percent differences (RPDs), and corresponding control limits;
6. Laboratory duplicate results for inorganic analyses, including relative percent differences and corresponding control limits;
7. Sample chain-of-custody documentation;
8. Holding times and conditions;
9. Conformance with required analytical protocol(s);
10. Instrument calibration;
11. Blanks;
12. Detection/quantitation limits;
13. Recoveries of surrogates;
14. Variability for duplicate analyses;
15. Completeness; and
16. Data report formats.

The following data deliverables for organic compounds shall be required from the laboratory:

1. A cover letter referencing the procedure used and discussing any analytical problems, deviations, and modifications, including signature from authority representative certifying to the quality and authenticity of data as reported;
2. Report of sample collection, extraction, and analysis dates, including sample holding conditions;
3. Tabulated results for samples in units as specified, including data qualification in conformance with EPA protocol, and definition of data descriptor codes;
4. Reconstructed ion chromatograms for gas chromatograph/mass spectrometry (GC/MS) analyses for each sample and standard calibration;
5. Selected ion chromatograms and mass spectra of detected target analytes (GC/MS) for each sample and calibration with associated library/reference spectra;

6. Gas chromatograph/electron capture device (GC/ECD) and/or gas chromatograph/flame ionization detector (GC/FID) chromatograms for each sample and standard calibration;
7. Raw data quantification reports for each sample and calibrations, including areas and retention times for analytes, surrogates, and internal standards;
8. A calibration data summary reporting calibration range used and a measure of linearity [include decafluorotriphenylphosphine (DFTPP) and p-bromofluorobenzene (BFB) spectra and compliance with tuning criteria for GC/MS];
9. Final extract volumes (and dilutions required), sample size, wet-to-dry weight ratios, and instrument practical detection/quantitation limit for each analyte;
10. Analyte concentrations with reporting units identified, including data qualification in conformance with the CLP Statement of Work (SOW) (include definition of data descriptor codes);
11. Quantification of analytes in all blank analyses, as well as identification of method blank associated with each sample;
12. Recovery assessments and a replicate sample summary, including all surrogate spike recovery data with spike levels/concentrations for each sample and all MS/MSD results (recoveries and spike amounts); and
13. Report of tentatively identified compounds with comparison of mass spectra to library/reference spectra.

The following data deliverables for inorganic compounds shall be required from the laboratory:

1. A cover letter referencing the procedure used and discussing any analytical problems, deviations, and modifications; including signature from authority representative certifying to the quality and authenticity of data as reported;
2. Report of sample collection, digestion, and analysis dates, with sample holding conditions;
3. Tabulated results for samples in units as specified, including data qualification in conformance with the CLP SOW (including definition of data descriptor codes);
4. Results of all method QA/QC checks, including inductively coupled plasma (ICP) Interference Check Sample and ICP serial dilution results;
5. Tabulation of instrument and method practical detection/quantitation limits;
6. Raw data quantification report for each sample;
7. A calibration data summary reporting calibration range used and a measure of linearity, where appropriate;
8. Final digestate volumes (and dilutions required), sample size, and wet-to-dry weight ratios;
9. Quantification of analytes in all blank analyses, as well as identification of method blank associated with each sample; and
10. Recovery assessments and a replicate sample summary, including post-digestate spike analysis; all MS data (including spike concentrations) for each sample, if accomplished; all MS results (recoveries and spike amounts); and laboratory control sample analytical results).

The Permittees shall present summary tables of these data and Level II QA/QC results to the Department in the formats described in Permit Section 8.12 (Reporting Requirements). The raw analytical data, including calibration curves, instrument calibration data, data calculation work sheets, and other laboratory support data for samples from this project, shall be compiled and kept on file at the Facility for reference. The Permittees shall make the data and all Level III or Level IV QA/QC data available to the Department upon request.

### **8.10.3.2 Review of Field and Laboratory QA/QC Data**

The Permittees shall evaluate the sample data, field, and laboratory QA/QC results for acceptability with respect to the data quality objectives (DQOs). Each group of samples shall be compared with the DQOs and evaluated using data validation guidelines contained in EPA guidance documents, the latest version of SW-846, and industry-accepted QA/QC methods and procedures.

The Permittees shall establish processes with analytical laboratories to identify data quality exceptions and to expeditiously initiate appropriate corrective actions. The Permittees shall require the laboratories to notify them when data quality exceptions are determined. Laboratory notification shall be timely in order to allow for sample re-analysis, if possible. The Permittees shall evaluate data quality exceptions and determine whether sample re-analysis is justified or resampling is required. Corrective actions may include documentation of QC issues in an analytical laboratory report, data qualifiers, and/or sample re-analysis. In all cases, the DQOs of the investigation or compliance activity shall be met.

### **8.10.3.3 Blanks, Field Duplicates, Reporting Limits, and Holding Times**

#### **8.10.3.3.i Blanks**

The analytical results of field blanks and field equipment rinse blanks shall be reviewed to evaluate the adequacy of the equipment decontamination procedures and the possibility of cross-contamination caused by decontamination of sampling equipment. The analytical results of trip blanks shall be reviewed to evaluate the possibility for contamination resulting from the laboratory-prepared sample containers or the sample transport containers. The analytical results of laboratory blanks shall be reviewed to evaluate the possibility of contamination caused by the analytical procedures. If contaminants are detected in field or laboratory blanks, the sample data shall be qualified, as appropriate.

#### **8.10.3.3.ii Field Duplicates**

Field duplicates shall consist of two samples either split from the same sample device or collected sequentially. Field duplicate samples shall be collected at a minimum frequency of 10 percent of the total number of environmental samples submitted for analysis. RPDs for field duplicates shall be calculated. The acceptable level of precision for duplicates shall be specified in the investigation work plan.

#### **8.10.3.3.iii Method Reporting Limits**

Method reporting limits for sample analyses for each medium shall be established at the lowest level practicable for the method and analyte concentrations and shall not exceed soil, groundwater, surface water, or vapor emissions background levels, cleanup standards, and screening levels. The

preferred method detection limits are a maximum of 20 percent of the background, screening, or cleanup levels. Detection limits that exceed established soil, groundwater, surface water, or air emissions cleanup standards, screening levels, or background levels and are reported as “not detected” shall be considered data quality exceptions and an explanation for the exceedance and its acceptability for use shall be provided.

#### 8.10.3.3.iv Holding Times

The Permittees shall review the sampling, extraction, and analysis dates to confirm that extraction and analyses were completed within the recommended holding times, as specified by EPA protocol. Appropriate data qualifiers shall be noted if holding times were exceeded.

### **8.10.3.4 Representativeness and Comparability**

#### 8.10.3.4.i Representativeness

Representativeness is a qualitative parameter related to the degree to which the sample data represent the relevant specific characteristics of the media sampled. The Permittees shall implement procedures to assure representative samples are collected and analyzed, such as repeated measurements of the same parameter at the same location over several distinct sampling events. The Permittees shall note any procedures or variations that may affect the collection or analysis of representative samples and shall qualify the data.

#### 8.10.3.4.ii Comparability

Comparability is a qualitative parameter related to whether similar sample data can be compared. To assure comparability, the Permittees shall report analytical results in appropriate units for comparison with other data (past studies, comparable sites, screening levels, and cleanup standards), and shall implement standard collection and analytical procedures. Any procedure or variation that may affect comparability shall be noted and the data shall be qualified.

### **8.10.3.5 Laboratory Reporting, Documentation, Data Reduction, and Corrective Action**

Upon receipt of each laboratory data package, data shall be evaluated against the criteria outlined in the previous sections. Any deviation from the established criteria shall be noted and the data will be qualified. A full review and discussion of analytical data QA/QC and all data qualifiers shall be submitted as appendices or attachments to investigation and monitoring reports prepared in accordance with Permit Section 8.12 (Reporting Requirements). Data validation procedures for all samples shall include checking the following, when appropriate:

1. Holding times;
2. Detection limits;
3. Field equipment rinsate blanks;
4. Field blanks;
5. Field duplicates;
6. Trip blanks;
7. Reagent blanks;

8. Laboratory duplicates;
9. Laboratory blanks;
10. Laboratory matrix spikes;
11. Laboratory matrix spike duplicates;
12. Laboratory blank spikes;
13. Laboratory blank spike duplicates; and
14. Surrogate recoveries.

If significant quality assurance problems are encountered, appropriate corrective action shall be implemented. All corrective action shall be defensible and the corrected data shall be qualified

#### **8.10.4 Site-Specific Human Health Risk Assessment**

Should the Permittees be unable to meet the cleanup levels in Permit Section 8.4, they shall conduct a site-specific risk assessment in accordance with current and acceptable EPA, Regional EPA, and Department guidance and methodology (as updated). If the Department determines that a human health risk assessment work plan is necessary, the Permittees shall submit to the Department for its review and approval a work plan that includes, at a minimum, the site-specific exposure assumptions and any additional sampling needed to support the risk assessment. The Permittees shall prepare a Human Health Risk Assessment Report in support of corrective action, and, if necessary, for closure in accordance with Permit Part 6.

##### **8.10.4.1 Human Health Risk Assessment Methods**

A risk assessment may be required for human receptors that are potentially exposed to site-related chemicals in environmental media. The risk assessment shall contain a conceptual site model (CSM), which shall aid in understanding and describing each site. The CSM shall address the following components:

1. Identification of suspected sources;
2. Identification of contaminants;
3. Identification of contaminant releases;
4. Identification of transport mechanisms;
5. Identification of affected media;
6. Identification of land use scenarios;
7. Identification of potential receptors under current land use scenario;
8. Identification of potential receptors under future land use scenario; and
9. Identification of potential routes of exposure.

Potential human receptors under current and/or future land use scenarios may include residential, industrial, construction, and recreational. Other special receptors may be required on a site-specific basis.

#### 8.10.4.1.i Exposure Pathways

The identification of exposure pathways shall include a discussion of all potential pathways and justify whether the pathways are complete. Pathways that shall be considered include soil, groundwater, air, surface water, sediment, and biota. An evaluation of the potential for contaminants to migrate from soil to groundwater shall also be provided. The risk assessment shall also address exposure mechanisms for each exposure pathway, including ingestion, inhalation, dermal, and inhalation of volatile organic compounds volatilized from soil and/or groundwater.

#### 8.10.4.1.ii Data Quality Assurance

The risk assessment shall include an evaluation of analytical data and the usability of the data in the assessment. Data validation shall be conducted in accordance with current EPA guidelines. The evaluation of data shall also include a comparison of detection limits with appropriate and current risk-based screening levels, if MDLs are inconsistent and do not achieve the requirements of Permit Section 8.10.3 (Chemical Analyses).

#### 8.10.4.1.iii Constituents of Potential Concern

Appropriate EPA and/or the Department guidance shall be used to identify constituents of potential concern (COPCs). With the exception of chemicals attributed to field or laboratory contamination, all analytes detected in sampled media (i.e., soil, air, surface water, groundwater, biota, and/or sediment) shall be retained or eliminated as COPCs using one or more of the following processes:

1. Site attribution analysis;
2. Essential nutrients; and/or
3. Risk-based toxicity screen.

Unless sufficient evidence and special circumstances can be provided by the Permittees, all detected organics not attributable to field or laboratory contamination shall be retained and treated as site-related chemicals.

Inorganics detected in site media shall be compared to an appropriate background data set to determine if concentrations are present at levels significantly above background. The site attribution analysis may consist of a tiered approach as follows:

1. Comparison of maximum site concentrations to a background reference value (e.g., upper tolerance limit, UTL);
2. If the site maximum exceeds the background reference value, and sample size is sufficient, statistically compare the site data set to the background data set using appropriate statistical analyses (e.g., Wilcoxon Rank Sum Test). If the sampling size is not sufficient to perform statistical analysis, a comparison of the maximum site concentration to the maximum background concentrations shall be used;
3. Conduct a graphical analysis of site data and background data (e.g., histograms and/or box and whisker plots);
4. Conduct a geochemical analysis of site data to a background reference chemical; and/or
5. Evaluate essential nutrients and compare to recommended daily allowances and/or upper intake limits.

All inorganics for which the site attribution analyses indicate are present above natural background shall be retained as COPCs for the risk assessments.

#### 8.10.4.1.iv Exposure Point Concentrations

The Permittees shall determine exposure point concentrations (EPCs) that are representative of the concentrations of chemicals in each given medium to which a receptor may be exposed. Current EPA methodology for handling non-detects and replicates in the risk assessment shall be applied. EPA recommends a 95% or greater estimate of the upper confidence limit ( $UCL \geq 95\%$ ) on the arithmetic mean be used as an EPC for chronic exposures. If conditions are identified where acute exposures must be evaluated, the maximum detected site concentration shall be used as the EPC.

The EPCs shall be determined using statistical analyses that are data distribution and size dependent. EPA and/or the Department accepted guidance and methodologies shall be used, such as the ProUCL software.

EPCs shall be calculated for soil, groundwater, surface water, sediment, and biota.

EPA does not recommend estimating intakes for the air inhalation pathway, but rather compares estimated volatile/particulate air concentrations adjusted for exposure frequencies, duration, and time. For inhalation of volatiles/particulates from soil, EPCs shall be determined based upon the current EPA and/or Department methodology, based upon the volatilization factor or particulate emission factor. Indoor air concentrations shall be determined using EPA and Department accepted approaches, such as the EPA-recommended Johnson and Ettinger model.

#### 8.10.4.1.v Toxicity Assessment

The Permittees shall use the most recently available toxicity factors to calculate carcinogenic and noncarcinogenic risks/hazards based upon the currently acceptable hierarchy of sources for toxicity data.

#### 8.10.4.1.vi Risk Characterization

The Permittees shall quantitatively estimate the potential for carcinogenic (risk) and non-carcinogenic (hazard) effects for all chemicals with toxicity data and provide a discussion of uncertainties associated with the risk assessment. Cumulative effects for risk and hazard for all media and pathways shall be determined.

For those chemicals without toxicity data, appropriate surrogate data may be applied. If surrogate toxicity data are not available, risks/hazards shall be qualitatively addressed in the uncertainties section of the report.

#### 8.10.4.1.vii Uncertainties

The Permittees shall provide an uncertainties section that discusses all assumptions, professional judgments, and data which may result in uncertainties in the final estimates of risk and hazard. The uncertainties shall also discuss whether risks/hazards may have been under or overestimated due to the assumptions made in the assessment.

### 8.10.5 Site-Specific Ecological Risk Assessment Methods

If the screening level ecological risk assessment indicates unacceptable risk, then the Permittees shall conduct a site-specific ecological risk assessment. If the Department determines that an ecological risk assessment work plan is necessary, the Permittees shall submit to the Department



for its review and approval a work plan that includes, at a minimum, the site-specific exposure assumptions and any additional sampling needed to support the risk assessment. In addition, the Permittees shall prepare a site-specific Ecological Risk Assessment Report in support of corrective action, and, if necessary, for closure in accordance with Permit Part 6 (Closure Requirements). The assessment shall be conducted using EPA and/or the Department approved guidance and methodologies. The ecological risk assessment shall follow the same methodologies outlined above in the human health risk assessment for determining constituent of potential ecological concern (COPEC) and data quality assurance.

#### **8.10.6 Determination of Background**

The Permittees shall use the background reference values that have been previously approved by the Department for the Facility to assess whether environmental media at a SWMU or AOC have been contaminated to levels exceeding background conditions for naturally occurring inorganic constituents (see Dinwiddie, 1997).

If the Permittees or Department determines that site-specific background values are necessary for a particular site investigation, the Permittees shall obtain an appropriate background data set. Background concentrations for groundwater shall be collected from upgradient wells. The background data set shall be representative of natural conditions unaffected by site activities and shall be statistically defensible. A sufficient number of background samples shall be collected to determine whether one or more background populations exist for each constituent and media of concern, and to determine appropriate statistical descriptors for each identified population.

The Permittees shall determine the following summary statistics for background concentrations for each constituent and media:

1. Number of detects;
2. Total number of samples;
3. Frequency of detection;
4. Minimum detected concentration;
5. Maximum detected concentration;
6. Arithmetic mean;
7. Median;
8. Sample standard deviation;
9. 25th and 95th % of sample population; and
10. Distribution type (for example, normal; log normal; or other type, including indeterminate).

If a sample population may be adequately represented as a normal or log normal distribution, the Permittees shall also determine the upper tolerance limit (UTL) for the distribution at a confidence level of 95% and with 95% coverage.

### **8.10.6.1 Comparing Site Data to Background**

The 95% UTL for each metal shall be used as the background reference value for use in screening assessments and determining whether metals are present in the subject media (e.g., soil, groundwater, surface water, sediment) due to site activities. The site maximum detected concentration shall be compared to the 95% UTL for each metal. If the site maximum detected concentration is greater than the background reference value, then additional site attribution analyses shall be conducted.

Site attribution analyses shall be conducted in accordance with Permit Section 8.10.4.1.iii and current EPA and/or the Department accepted guidance. The site attribution analyses shall consist of a statistical comparison of the background data set to the site data set, if sufficient samples are available, using distribution based tests such as the Wilcoxon Rank Sum Test.

If the results of the site attribution analyses indicate that the metal is present at the site above naturally occurring levels, then the Permittees shall include that metal as a site contaminant.

## **8.11 MONITORING WELL CONSTRUCTION REQUIREMENTS**

### **8.11.1 Drilling Methods**

Groundwater monitoring wells and piezometers must be designed and constructed in a manner which will yield high quality samples and ensure that the well will not serve as a conduit for contaminants to migrate between different stratigraphic units or aquifers. The design and construction of groundwater monitoring wells shall comply with the guidelines established in various EPA RCRA guidance, including, but not limited to:

1. U.S. EPA, RCRA Groundwater Monitoring: Draft Technical Guidance, EPA/530-R-93-001 (November 1992);
2. U.S. EPA, RCRA Groundwater Monitoring Technical Enforcement Guidance Document, OSWER-9950.1 (September 1986); and
3. Aller, L., Bennett, T.W., Hackett, G., Petty, R.J., Lehr, J.H., Sedoris, H., Nielsen, D.M., and Denne, J.E., Handbook of Suggested Practices for the Design and Installation of Groundwater Monitoring Wells, EPA 600/4-89/034 (1989).

A variety of methods are available for drilling monitoring wells. While the selection of the drilling procedure is usually based on the site-specific geologic conditions, the following issues shall also be considered:

1. Drilling shall be performed in a manner that minimizes impacts to the natural properties of the subsurface materials;
2. Contamination and cross-contamination of groundwater and aquifer materials during drilling shall be avoided;
3. The drilling method shall allow for the collection of representative samples of rock, unconsolidated materials, and soil;
4. The drilling method shall allow the Permittees to determine when the appropriate location for the screened interval(s) has been encountered; and

5. The drilling method shall allow for the proper placement of the filter pack and annular sealants. The borehole diameter shall be at least 4 inches larger in diameter than the nominal diameter of the well casing and screen to allow adequate space for placement of the filter pack and annular sealants.

The drilling method shall allow for the collection of representative groundwater samples. Drilling fluids (which includes air) shall be used only when minimal impact to the surrounding formation and groundwater can be ensured.

A brief description of the different drilling methods that may be appropriate for the construction of monitoring wells at the Facility follows. Many of these methods may be used alone, or in combination, to install monitoring wells at the Facility. While the selection of the specific drilling procedure will usually depend on the site-specific geologic conditions, justification for the method selected must be included in the Well Installation Work Plan or other work plan submitted to the Department prior to well installation.

#### **8.11.1.1 Hollow-Stem Auger**

The hollow-stem continuous flight auger consists of a hollow, steel shaft with a continuous, spiraled steel flight welded onto the exterior side of the stem. The stem is connected to an auger bit and, when rotated, transports cuttings to the surface. The hollow stem of the auger allows drill rods, split-spoon core barrels, Shelby tubes, and other samplers to be inserted through the center of the auger so that samples may be retrieved during the drilling operations. The hollow stem also acts to temporarily case the borehole, so that the well screen and casing (riser) may be inserted down through the center of the augers once the desired depth is reached, minimizing the risk of possible collapse of the borehole. A bottom plug or pilot bit can be fastened onto the bottom of the augers to keep out most of the soils and/or water that have a tendency to clog the bottom of the augers during drilling. Drilling without a center plug is acceptable provided that the soil plug, formed in the bottom of the auger, is removed before sampling or installing well casings. The soil plug can be removed by washing out the plug using a side discharge rotary bit, or augering out the plug with a solid-stem auger bit sized to fit inside the hollow-stem auger. In situations where heaving sands are a problem, potable water may be poured into the augers to equalize the pressure so that the inflow of formation materials and water shall be held to a minimum when the bottom plug is removed. The hollow-stem auger method is best suited for drilling shallow overburden wells.

#### **8.11.1.2 Air Rotary/Air Down-The-Hole Hammer/ODEX**

The air rotary method consists of a drill pipe or drill stem coupled to a drill bit that rotates and cuts through soils and rock. The cuttings produced from the rotation of the drilling bit are transported to the surface by compressed air, which is forced down the borehole through the drill pipe and returns to the surface through the annular space (between the drill pipe and the borehole wall). The circulation of the compressed air not only removes the cuttings from the borehole but also helps to cool the drill bit. The use of air rotary drilling is best suited for hard-rock formations. In soft unconsolidated formations, casing is driven to keep the formation from caving. When using air rotary, the air compressor shall have an in-line filter system to filter the air coming from the compressor. The filter system shall be inspected regularly to ensure that the system is functioning properly. In addition, a cyclone velocity dissipater or similar air containment/dust-suppression

system shall be used to funnel the cuttings to one location instead of allowing the cuttings to discharge uncontrolled from the borehole. Air rotary that employs the dual-tube (reverse circulation) drilling system is acceptable because the cuttings are contained within the drill stem and are discharged through a cyclone velocity dissipater to the ground surface.

The injection of air into the borehole during air rotary drilling has the potential to alter the natural properties of the subsurface. This can occur through air-stripping of the VOCs in both soil and groundwater in the vicinity of the borehole, altering the groundwater geochemical parameters (e.g., pH and redox potential), and potentially increasing biodegradation of organic compounds in the aquifer near the borehole. These factors may prevent the well from yielding groundwater samples that are representative of in-situ conditions.

In hard, abrasive, consolidated rock, a down-the-hole hammer may be more appropriate than the air rotary method. In this method, compressed air is used to actuate and operate a pneumatic hammer as well as lift the cuttings to the surface and cool the hammer bit. One drawback of the down-the-hole hammer is that oil is required in the air stream to lubricate the hammer-actuating device, and this oil could potentially contaminate the soil in the vicinity of the borehole and the aquifer.

The ODEX method is a variation of the air rotary method in which a casing-driving technique is used in combination with air rotary drilling. With the ODEX system, the drill bit extends outward and reams a pilot hole large enough for a casing assembly to slide down behind the drill bit assembly. As a result, casing is advanced simultaneously while drilling the hole.

### **8.11.1.3 Water Rotary and Mud Rotary**

The water and mud rotary drilling methods consist of rotary drilling techniques where water or drilling mud is used as the circulating fluid. In both methods, the circulating fluid is pumped down through the drill pipe and is returned back up the borehole through the annular space. The circulating fluid stabilizes the borehole, cools the drill bit, and carries the drill cuttings up to the surface. While the water and mud rotary drilling techniques are rapid and effective drilling methods, the recognition of water-bearing zones is hampered by the addition of water into the system. Mud rotary drilling methods are discouraged if the well is to be used for monitoring of water quality.

Mud rotary drilling is similar to water rotary drilling with the exception that mud additives are added to the water to change the properties (e.g., density, viscosity, yield point, gel strength, fluid-loss-control effectiveness, and lubricity) of the circulating fluid. Drilling muds provide greater borehole stabilization than water alone. There are several types of mud presently available, including bentonite, barium sulfate, organic polymers, cellulose polymers, and polyacrylamides. While drilling muds enhance the stability of the borehole and allow for drilling in formations not appropriate to other methods, they can adversely affect the hydrologic properties and geochemistry of the aquifer. For example, drilling fluid invasion and the buildup of borehole filter cake may reduce the effective porosity of the aquifer in the vicinity of the borehole. In addition, bentonite drilling muds may affect the pH of groundwater and organic polymer drilling muds have been observed to facilitate bacterial growth, which reduces the reliability of sampling results. If polymer emulsions are to be used in the drilling program at the Facility, polymer dispersion agents shall be used at the completion of the drilling program to remove the polymers from the boreholes. For example, if EZ Mud® is used as a drilling additive, a dispersant (e.g., BARAFOS® or five

percent sodium hypochlorite) shall be used to disperse and chemically break down the polymer prior to developing and sampling the well. If drilling fluids are used as part of well installation, the Permittees must demonstrate that all data acquired from the well is representative of existing subsurface conditions using methods approved by the Department. The Department may require additional sampling and testing periodically to ensure that the data collected is not affected by residual drilling fluids.

#### **8.11.1.4 Dual-Wall Reverse Circulation**

The dual-wall reverse circulation drilling method utilizes a double-wall drill pipe and has the reverse circulation of other conventional rotary drilling methods. The circulating fluid (water or air) is pumped down the borehole between the outer and inner drill pipe, and returns up the inner drill pipe. Cuttings are lifted to the surface through the inner drill pipe. The inner drill pipe rotates the bit, and the outer drill pipe acts as a casing and stabilizes the borehole. Typically, a tri-cone bit is used when drilling through unconsolidated formations and a down-the-hole hammer is used in hard rock.

The dual-wall reverse circulation rotary method is one of the better methods available for obtaining representative and continuous formation samples while drilling. If a roller cone bit is used, the formation that is being drilled is located only a few inches ahead of the double-wall pipe. As a result, the cuttings observed at the surface represent no more than one foot of the formation at any point in time.

When drilling with air, an in-line filter shall be used to remove oil or other impurities from the airstream. However, if a down-the-hole hammer is used, it must be used with caution since it requires oil in the airstream to lubricate the hammer. This could possibly introduce contaminants to the borehole and aquifer.

#### **8.11.1.5 Resonant Sonic**

Resonant sonic drilling is a method that uses a sonic drill head to produce high-frequency, high-force vibrations in a steel drill pipe. The vibrations in the pipe create a cutting action at the bit face, which allows a continuous core of the formation to move into a core barrel. The method requires no drilling fluid, drills very fast (up to one ft/sec in certain formations), drills at any angle through all formations (rock, clay, sand, boulders, permafrost, glacial till), and yields virtually no cuttings in the drilling process. While there are numerous advantages to this process, the primary disadvantage is the cost of the method. This drilling method has been proven and used at various facilities.

#### **8.11.1.6 Cryogenic**

Cryogenic drilling is a technique that uses standard air rotary drilling methods, but employs cold nitrogen gas as the circulating fluid instead of compressed air. The use of nitrogen gas as the circulation fluid freezes the borehole wall while drilling, which stabilizes unconsolidated sediments and prevents potential cross-contamination of different water-bearing zones. In addition, the method produces fewer cuttings than liquid based drilling methods, requires minimal equipment modifications to existing drill rigs, and does not add contaminants to the borehole during the drilling process due to the benign nature of nitrogen gas. The method is especially

applicable for drilling through alternating hard (competent) and soft (unconsolidated) formations. This drilling method has been tested by the DOE and proposed for future use at various DOE facilities.

## **8.11.2 Well Construction/Completion Methods**

### **8.11.2.1 Well Construction Materials**

Well construction materials shall be selected based on the goals and objectives of the proposed monitoring program and the geologic conditions at the site. When selecting well construction materials, the primary concern shall be selecting materials that will not contribute foreign constituents or remove contaminants from the groundwater. Other factors to be considered include the tensile strength, compressive strength, and collapse strength of the materials; length of time the monitoring well will be in service; and the material's resistance to chemical and microbiological corrosion.

Well screen and casing materials acceptable for the construction of RCRA monitoring wells include stainless steel (304 or 316), rigid PVC (meeting American National Standards Institute/National Sanitation Foundation Standard 14), and fluoropolymer materials (polytetrafluoroethylene, fluorinated ethylene propylene, and polyvinylidene). In addition, there are other materials available for the construction of monitoring wells including acrylonitrile butadiene styrene (ABS), fiberglass-reinforced plastic (FRP), black iron, carbon steel, and galvanized steel, but these materials are not recommended for use in long term monitoring wells due to their low resistance to chemical attack and potential contribution of contamination to the groundwater. However, these materials may be used in the construction of monitoring wells where they will not be in contact with the groundwater that will be sampled (e.g., carbon steel pipe used as surface casing).

### **8.11.2.2 Well Construction Techniques**

#### **8.11.2.2.i Single-Cased Wells**

The borehole shall be bored, drilled, or augered as close to vertical as possible, and checked with a plumb bob, level, or appropriate downhole logging tool. Slanted boreholes shall not be acceptable unless specified in the design. The borehole shall be of sufficient diameter so that well construction can proceed without major difficulties. To assure an adequate size, a minimum two-inch annular space is required between the casing and the borehole wall (or the hollow-stem auger wall). The two-inch annular space around the casing will allow the filter pack, bentonite seal, and annular grout to be placed at an acceptable thickness. Also, the two-inch annular space will allow up to a 1.5-inch outer diameter tremie pipe to be used for placing the filter pack, bentonite seal, and grout at the specified intervals.

It may be necessary to over-drill the borehole so that any soils that have not been removed (or that have fallen into the borehole during augering or drill stem retrieval) will fall to the bottom of the borehole below the depth where the filter pack and well screen are to be placed. Normally, three to five ft is sufficient for over-drilling shallow wells. Deep wells may require deeper over-drilling. The borehole can also be over-drilled to allow for an extra space for a well sump to be installed.

If the borehole is over-drilled deeper than desired, it can be backfilled to the designated depth with bentonite pellets or the filter pack.

The well casings (riser assembly) should be secured to the well screen by flush-jointed threads or other appropriate connections and placed into the borehole and plumbed by the use of centralizers, a plumb bob, or a level. No petroleum-based lubricating oils or grease shall be used on casing threads. Teflon tape can be used to wrap the threads to ensure a tight fit and minimize leakage. No glue of any type shall be used to secure casing joints. Teflon "O" rings can also be used to ensure a tight fit and minimize leakage. "O" rings made of materials other than Teflon are not acceptable if the well will be sampled for organic compound analyses. Before the well screen and casings are placed at the bottom of the borehole, at least six inches of filter material shall be placed at the bottom to serve as a firm footing. The string of well screen and casing should then be placed into the borehole and plumbed. If centralizers are used, they shall be placed below the well screens and above the bentonite annular seals so that the placement of the filter pack, overlying bentonite seal, and annular grout will not be hindered. Centralizers placed in the wrong locations can cause bridging during material placement. If installing the well screen and casings through hollow-stem augers, the augers shall be slowly extracted as the filter pack, bentonite seal, and grout are placed in the well. The gradual extraction of the augers will allow the materials being placed in the augers to flow out of the bottom of the augers into the borehole. If the augers are not gradually extracted, the materials will accumulate at the bottom of the augers causing potential bridging problems. After the string of well screen and casing is plumb, the filter material shall be placed around the well screen up to the designated depth. After the filter pack has been installed, the bentonite seal shall be placed directly on top of the filter pack up to the designated depth or a minimum of two ft above the filter pack, whichever is greater. After the bentonite seal has hydrated for the specified time, the annular grout shall be pumped by the tremie method into the annular space around the casings (riser assembly) up to within two feet of the ground surface or below the frost line, whichever is greater. The grout shall be allowed to cure for a minimum of 24 hours before the surface pad and protective casing are installed. After the surface pad and protective casing are installed, bumper guards (guideposts) shall be installed (if necessary).

#### 8.11.2.2.ii Double-Cased Wells

Double-cased wells should be constructed when there is reason to believe that interconnection of two aquifers by well construction may cause cross contamination, or when flowing sands make it impossible to install a monitoring well using conventional methods. A pilot borehole should be advanced through the overburden and the contaminated zone into a clay, confining layer, or bedrock. An outer casing (surface or pilot casing) shall be placed into the borehole and sealed with grout. The borehole and outer casing should extend into tight clay a minimum of two ft or into competent bedrock a minimum of one foot. The total depth into the clay or bedrock will vary depending upon the plasticity of the clay and the extent of weathering and fracturing of the bedrock. The size of the outer casing shall be of sufficient inside diameter to contain the inner casing and the two-inch annular space. In addition, the borehole shall be of sufficient size to contain the outer casing and the two-inch minimum outer annular space, if applicable.

The outer casing shall be grouted by the tremie method from the bottom of the borehole to within two ft of the ground surface. The grout shall be pumped into the annular space between the outer casing and the borehole wall. This can be accomplished by either placing the tremie pipe in the annular space and pumping the grout from the bottom of the borehole to the surface, or placing a grout shoe or plug inside the casing at the bottom of the borehole and pumping the grout through

the bottom grout plug and up the annular space on the outside of the casing. The grout shall consist of Type I Portland cement and bentonite or other approved grout to provide a rigid seal. A minimum of 24 hours shall be allowed for the grout plug (seal) to cure before attempting to drill through it. When drilling through the seal, care shall be taken to avoid cracking, shattering, and washing out of the seal. If caving conditions exist so that the outer casing cannot be sufficiently sealed by grouting, the outer casing shall be driven into place and a grout seal placed in the bottom of the casing.

#### 8.11.2.2.iii Bedrock Wells

The installation of monitoring wells into bedrock can be accomplished in two ways. The first method is to drill or bore a pilot borehole through the soil overburden into the bedrock. An outer casing is installed into the borehole by setting it into the bedrock, and grouting it into place. After the grout has set, the borehole can be advanced through the grout seal into the bedrock. The preferred method of advancing the borehole into the bedrock is rock coring. Rock coring makes a smooth, round hole through the seal and into the bedrock without cracking or shattering the seal. Roller cone bits are used in soft bedrock, but extreme caution should be taken when using a roller cone bit to advance through the grout seal in the bottom of the borehole because excessive water and bit pressure can cause cracking, eroding (washing), and/or shattering of the seal. Low volume air hammers may be used to advance the borehole, but they have a tendency to shatter the seal because of the hammering action. If the structural integrity of the grout seal is in question, a pressure test can be utilized to check for leaks. If the seal leaks, the seal is not acceptable. When the drilling is complete, the finished well will consist of an open borehole from the ground surface to the bottom of the well. The major limitation of open borehole bedrock wells is that the entire bedrock interval serves as the monitoring zone.

The second method is to install the outer surface casing and drill the borehole into bedrock, and then install an inner casing and well screen with the filter pack, bentonite seal, and annular grout. The well is completed with a surface protective casing and concrete pad. This well installation method gives the flexibility of isolating the monitoring zone(s) and minimizing inter-aquifer flow. In addition, it gives structural integrity to the well, especially in unstable areas (e.g., steeply dipping shales) where the bedrock has a tendency to shift or move when disturbed.

#### 8.11.2.3 Well Screen and Filter Pack Design

Well screens and filter packs shall be designed to accurately sample the aquifer zone that the well is intended to sample, minimize the passage of formation materials (turbidity) into the well, and ensure sufficient structural integrity to prevent the collapse of the intake structure. The selection of the well screen length depends upon the objective of the well. Monitoring well screens shall be kept to the minimum length appropriate for intercepting a contaminant plume. The screen slot size shall be selected to retain from 90 to 100 percent of the filter pack material in artificially filter packed wells, and from 50 to 100 percent of the formation material in naturally packed wells. All well screens shall be factory wire-wrapped or machine slotted.

A filter pack shall be used when: 1) the natural formation is poorly sorted; 2) a long screen interval is required or the screen spans highly stratified geologic materials of widely varying grain sizes; 3) the natural formation is uniform fine sand, silt, or clay, 4) the natural formation is thin-bedded; 5) the natural formation is poorly cemented sandstone; 6) the natural formation is highly fractured or characterized by relatively large solution channels; 7) the natural formation is shale or coal that



will act as a constant source of turbidity to groundwater samples; or 8) the diameter of the borehole is significantly greater than the diameter of the screen. The use of natural formation material as a filter pack is only recommended when the natural formation materials are relatively coarse-grained, permeable, and uniform in grain size.

Filter pack materials shall consist of clean, rounded to well-rounded, hard, insoluble particles of siliceous composition (industrial grade quartz sand or glass beads). The required grain-size distribution or particle sizes of the filter pack materials shall be selected based upon a sieve analysis of the aquifer materials or the formation to be monitored, or the characteristics of the aquifer materials using information acquired during previous investigations.

Where sieve analyses are used to select the appropriate filter pack particle size, the results of a sieve analysis of the formation materials are plotted on a grain-size distribution graph, and a grain-size distribution curve is generated. The 70 percent retained grain size value should be multiplied by a factor between four and six (four for fine, uniform formations and six for coarse, non-uniform formations). A second grain-size distribution curve is then drawn on the graph for this new value, ensuring that the uniformity coefficient does not exceed 2.5. The filter pack that shall be used will fall within the area defined by these two curves.

Once the filter pack size is determined, the screen slot size shall be selected to retain at least 90 percent of the filter pack material. The Permittees may propose the use of a pre-determined well screen slot size and filter pack for monitoring wells in the site-specific work plans submitted to the Department.

The filter pack shall be installed in a manner that prevents bridging and particle-size segregation. Filter pack materials shall not be poured into the annular space unless the well is shallow (e.g., less than 30 ft deep) and the filter pack material can be poured continuously into the well without stopping. At least two inches of filter pack material shall be installed between the well screen and the borehole wall, and two ft of material shall extend above the top of the well screen. A minimum of six-inches of filter pack material shall also be placed under the bottom of the well screen to provide a firm footing and an unrestricted flow under the screened area. In deep wells (e.g., greater than 200 ft deep), the filter pack may not compress when initially installed. As a result, filter packs may need to be installed as high as five ft above the screened interval in these situations. The precise volume of filter pack material required shall be calculated and recorded before placement, and the actual volume used shall be determined and recorded during well construction. Any significant discrepancy between the calculated and actual volume shall be explained. Prior to installing the filter pack annular seal, a one to two-ft layer of chemically inert fine sand shall be placed over the filter pack to prevent the intrusion of annular sealants into the filter pack.

#### **8.11.2.4 Annular Sealant**

The annular space between the well casing and the borehole must be properly sealed to prevent cross-contamination of samples and the groundwater. The materials used for annular sealants shall be chemically inert with respect to the highest anticipated concentration of chemical constituents expected in the groundwater at the Facility. In general, the permeability of the sealing material shall be one to two orders of magnitude lower than the least permeable parts of the formation in contact with the well. The precise volume of annular sealants required shall be calculated and recorded before placement, and the actual volume shall be determined and recorded during well

construction. Any significant discrepancy between the calculated volume and the actual volume shall be explained.

During well construction, an annular seal shall be placed on top of the filter pack. This seal shall consist of a high solids (10-30 percent) bentonite material in the form of bentonite pellets, granular bentonite, or bentonite chips. The bentonite seal shall be placed in the annulus by pouring directly down the annulus. If the bentonite materials are poured directly down the annulus a tagging device shall be used to ensure that the seal is emplaced at the proper depth and the bentonite has not bridged higher in the well casing. The bentonite seal shall be placed above the filter pack a minimum of two ft vertical thickness. The bentonite seal shall be allowed to completely hydrate in conformance with the manufacturer's specifications prior to installing the overlying annular grout seal. The time required for the bentonite seal to completely hydrate will differ with the materials used and the specific conditions encountered, but is generally a minimum of four to 24 hours.

A grout seal shall be installed on top of the filter pack annular seal. The grout seal may consist of a high solids (30 percent) bentonite grout, a neat cement grout, a cement/bentonite grout, or other suitable seal material that is approved by the Department. The grout shall be pumped under pressure (not gravity fed) into the annular space by the tremie pipe method, from the top of the filter pack annular seal to within a few feet of the ground surface. The tremie pipe shall be equipped with a side discharge port (or bottom discharge for grouting at depths greater than 100 feet) to minimize damage to the filter pack or filter pack annular bentonite seal during grout placement. The grout seal shall be allowed to cure for a minimum of 24 hours before the concrete surface pad is installed. All grouts shall be prepared in accordance with the manufacturer's specifications. High solids (30 percent) bentonite grouts shall have a minimum density of 10 pounds per gallon (as measured by a mud balance) to ensure proper setup. Cement grouts shall be mixed using six and one-half to seven gallons of water per 94-pound bag of Type I Portland cement. Bentonite (five to ten percent) may be added to delay the setting time and reduce the shrinkage of the grout.

### **8.11.3 Well Development**

All monitoring wells shall be developed to create an effective filter pack around the well screen, correct damage to the formation caused by drilling, remove fine particles from the formation near the borehole, and assist in restoring the natural water quality of the aquifer in the vicinity of the well. Development stresses the formation around the screen, as well as the filter pack, so that mobile fines, silts, and clays are pulled into the well and removed. Development is also used to remove any foreign materials (e.g., water, drilling mud) that may have been introduced into the borehole during the drilling and well installation activities, and to aid in the equilibration that will occur between the filter pack, well casing, and the formation water. The development of a well is extremely important to ensuring the collection of representative groundwater samples.

Newly installed monitoring wells shall not be developed for at least 48 hours after the annular seal and backfill are installed. A new monitoring well shall be developed until the column of water in the well is free of visible sediment, and the pH, temperature, turbidity, and specific conductivity have stabilized. In most cases, the above requirements can be satisfied. However, in some cases, the pH, temperature, and specific conductivity may stabilize but the water remains turbid. In this case, the well may still contain well construction materials, such as drilling mud in the form of a

mud cake or formation soils that have not been washed out of the borehole. Thick drilling mud cannot be flushed out of a borehole with one or two well volumes of flushing. Instead, continuous flushing over a period of several days may be necessary to complete the well development. If the well is pumped dry, the water level shall be allowed to sufficiently recover before the next development period is initiated. The common methods used for developing wells include:

1. Pumping and over-pumping;
2. Backwashing;
3. Surging (with a surge block);
4. Bailing;
5. Jetting; and
6. Airlift pumping.

These development procedures can be used, either individually or in combination, to achieve the most effective well development. However, the most favorable well development methods include pumping, over-pumping, bailing, surging, or a combination of these methods. Well development methods and equipment that alter the chemical composition of the groundwater shall not be used. Development methods that involve adding water or other fluids to the well or borehole, or that use air to accomplish well development should be avoided, if possible. Approval shall be obtained from the Department prior to introducing air, water, or other fluids into the well for the purpose of well development. If water is introduced to a borehole during well drilling and completion, then the same or greater volume of water shall be removed from the well during development. In addition, the volume of water withdrawn from a well during development shall be recorded, and the Permittees shall use their best efforts to avoid pumping wells dry during development activities. Well or piezometer development must be completed within 30 days of installation of the well or piezometer or immediately after all wells proposed in an investigation work plan are installed.

#### **8.11.4 Surface Completion**

Monitoring wells may be completed either as flush-mounted wells, or as above-ground completions. A surface seal shall be installed over the grout seal and extended vertically up the well annulus to the land surface. The lower end of the surface seal shall extend a minimum of 1 foot below the frost line to prevent damage from frost heaving. The composition of the surface seal shall be neat cement or concrete. In above-ground completions, a three-foot wide, four-inch thick concrete surface pad shall be installed around the well at the same time the protective casing is installed. The surface pad shall be sloped so that drainage will flow away from the protective casing and off the pad. In addition, a minimum of one inch of the finished pad shall be below grade or ground elevation to prevent washing and undermining by soil erosion.

A locking protective casing shall be installed around the well casing (riser) to prevent damage or unauthorized entry. The protective casing shall be anchored in the concrete surface pad below the frost line and extend several inches above the well riser stickup. A weep hole may be drilled into the protective casing just above the top of the concrete surface pad to prevent water from accumulating and freezing inside the protective casing around the well riser. A cap shall be placed on the well riser to prevent tampering or the entry of foreign materials, and a lock shall be installed on the protective casing to provide security. If the wells are located in an area that receives traffic,

a minimum of three bumper guards consisting of steel pipes three to four inches in diameter and a minimum of five-foot length should be installed. The bumper guards should be installed to a minimum depth of two feet below the ground surface in a concrete footing and extend a minimum of three feet above ground surface. The pipes should be filled with concrete to provide additional strength. The pipes should be painted a bright color to reduce the possibility of vehicular damage.

If flush-mounted completions are required (e.g., in active roadway areas), a protective structure such as a utility vault or meter box should be installed around the well casing. In addition, measures should be taken to prevent the accumulation of surface water in the protective structure and around the well intake. These measures should include outfitting the protective structure with a steel lid or manhole cover that has a rubber seal or gasket, and ensuring that the bond between the cement surface seal and the protective structure is watertight.

### **8.11.5 Well Abandonment**

All well abandonment must be conducted in accordance with 19.27.4 NMAC. Wells are usually abandoned when they are no longer required in the monitoring network or when they are damaged beyond repair. The goal of well abandonment is to seal the borehole in such a manner that the well cannot act as a conduit for migration of contaminants from the ground surface to the aquifer or between aquifers. To properly abandon a well, the preferred method is to completely remove the well casing and screen from the borehole, clean out the borehole, and backfill with a cement or bentonite grout, neat cement, or concrete. The well abandonment procedure must also comply with current EPA well abandonment guidance.

If conditions allow, for wells with small diameter casing, abandonment shall be accomplished by overdrilling the well with a large diameter hollow-stem auger. After the well has been overdrilled, the well casing and grout can be lifted out of the ground with a drill rig, and the remaining filter pack can be drilled out. The open borehole can then be pressure grouted (via the tremie pipe method) from the bottom of the borehole to the ground surface. After the grout has cured, the top two feet of the borehole shall be filled with concrete to ensure a secure surface seal.

Several other well abandonment procedures are available for wells with larger diameter screens and casings. One method is to force a drill stem with a tapered wedge assembly or a solid-stem auger into the well casing and pull the casing out of the ground. However, if the casing breaks or the well cannot be pulled from the ground, the well will have to be grouted in place. To abandon a well in place, a tremie pipe shall be placed at the lowest point in the well (at the bottom of the screen or in the well sump). The entire well is then pressure grouted from the bottom of the well upward. The pressurized grout will be forced out through the well screen into the filter pack and up the inside of the well casing sealing off all breaks and holes in the casing. Once the well is grouted, the casing is cut off even with the ground surface and covered with concrete.

If a PVC well cannot be abandoned due to internal casing damage (e.g., the tremie pipe cannot be extended to the bottom of the screen), it may be necessary to drill out the casing with a roller cone or drag bit using the wet rotary drilling method, or grind out the casing using a solid-stem auger equipped with a carbide tooth bit. Once the casing is removed, the open borehole can be cleaned out and pressure grouted from the bottom of the borehole upward.

### **8.11.6 Documentation**

All information on the design, construction, and development of each monitoring well shall be recorded and presented on a boring log, a well construction log, and well construction diagram. The well construction log and well construction diagram shall include the following information:

1. Well name/number;
2. Date/time of well construction;
3. Borehole diameter and well casing diameter;
4. Well depth;
5. Casing length;
6. Casing materials;
7. Casing and screen joint type;
8. Screened interval(s);
9. Screen materials;
10. Screen slot size and design;
11. Filter pack material and size;
12. Filter pack volume (calculated and actual);
13. Filter pack placement method;
14. Filter pack interval(s);
15. Annular sealant composition;
16. Annular sealant placement method;
17. Annular sealant volume (calculated and actual);
18. Annular sealant interval(s);
19. Surface sealant composition;
20. Surface seal placement method;
21. Surface sealant volume (calculated and actual);
22. Surface sealant interval;
23. Surface seal and well apron design and construction;
24. Well development procedure and turbidity measurements;
25. Well development purge volume(s) and stabilization parameter measurements;
26. Type and design and construction of protective casing;
27. Well cap and lock;
28. Ground surface elevation;
29. Survey reference point elevation on well casing;

30. Top of monitoring well casing elevation; and
31. Top of protective steel casing elevation.

## **8.12 REPORTING REQUIREMENTS**

### **8.12.1 General**

The purpose of this Permit Section is to provide the reporting requirements and report formats for corrective action activities at all SWMUs, AOCs, and permitted units required under this Permit. This Permit Section is not intended to provide reporting requirements for every potential corrective action conducted at the Facility; therefore, the formats for all types of reports are not presented below. The described formats include the general reporting requirements and formats for site-specific investigation work plans, investigation reports, periodic monitoring reports, risk assessment reports, and corrective measures evaluations. The Permittees shall generally consider the reports to be the equivalents of RCRA Facility Investigation (RFI) work plans, RFI reports, periodic monitoring reports, risk assessments, Corrective Measures Study (CMS) plans, and CMS reports, for the purposes of RCRA compliance. The Permittees shall include detailed, site-specific requirements in all SWMU, AOC, permitted unit and facility-wide investigation work plans, investigation reports, monitoring reports, and corrective measures evaluations. All plans and reports shall be prepared considering any technical and regulatory input received from the Department. All work plans, reports and other documents shall be submitted to the Department as required in Permit Section 1.14.

The reporting requirements listed in this attachment do not include all sections that may be necessary to complete each type of report listed and may include sections that are not relevant for a specific site action. The Permittees or the Department may determine that additional sections may be needed to address additional site-specific issues or information collected during corrective action or monitoring activities not listed below. All reports submitted by the Permittees shall follow the general approach and limitations for data presentation described in this Permit Part.

### **8.12.2 Investigation Work Plan**

The Permittees shall prepare work plans for site investigations or corrective action activities at the Facility using the general outline below. The minimum requirements for describing proposed activities within each section are included. All research, locations, depths and methods of exploration, field procedures, analytical results, data collection methods, and schedules shall be included in each work plan. In general, interpretation of data acquired during previous investigations shall be presented only in the background sections of the work plans. The other text sections of the work plans shall be reserved for presentation of anticipated site-specific activities and procedures relevant to the project. The general work plan outline is described below.

#### **8.12.2.1 Title Page**

The title page shall include the type of document; Facility name; Area designation; SWMU or AOC name, site, and any other unit name; and the submittal date. A signature block providing spaces for the names and titles of the responsible representatives of the Permittees shall be provided on the title page in accordance with 40 CFR § 270.11(d)(1).

#### **8.12.2.2 Executive Summary (Abstract)**

The executive summary or abstract shall provide a brief summary of the purpose and scope of the investigation to be conducted at the subject site. The Facility, SWMU or AOC name, permitted unit reference, site name, any other unit name, location, and Area designation shall be included in the executive summary.

#### **8.12.2.3 Table of Contents**

The table of contents shall list all text sections, tables, figures, and appendices or attachments included in the work plan. The corresponding page numbers for the titles of each section of the work plan shall be included in the table of contents.

#### **8.12.2.4 Introduction**

The introduction shall include the Facility name, area designation, unit location, and unit status (e.g., closed, corrective action). General information on the current site usage and status shall be included in this section. A brief description of the purpose of the investigation and the type of site investigation to be conducted shall be provided in this section.

#### **8.12.2.5 Background**

The background section shall describe relevant background information. This section shall briefly summarize historical site uses by the U.S. Government and any other entity, including the locations of current and former site structures and features. A labeled figure shall be included in the document showing the locations of current and former site structures and features. The locations of pertinent subsurface features such as pipelines, underground tanks, utility lines, and other subsurface structures shall be included in the background summary and labeled on the figure, unless none exist.

This section shall identify potential receptors, including groundwater, and include a brief summary of the type and characteristics of all waste and all contaminants managed or released at the site, the known and possible sources of contamination, the history of releases or discharges of contamination, and the known extent of contamination. This section shall include brief summaries of results of previous investigations, if conducted, including references to pertinent figures, data summary tables, and text in previous reports. At a minimum, detections of contaminants encountered during previous investigations shall be presented in table format, with an accompanying figure showing sample locations. References to previous reports shall include page, table, and figure numbers for referenced information. Summary data tables and site plans showing relevant investigation locations shall be included in the Tables and Figures sections of the document, respectively.

#### **8.12.2.6 Site Conditions**

##### **8.12.2.6.i Surface Conditions**

A section on surface conditions shall provide a description of current site topography, features and structures including a description of topographic drainages, man-made drainages, vegetation, erosional features, and basins. It shall also include a detailed description of current site usage and

any current operations at the site. In addition, descriptions of features located in surrounding sites that may have an impact on the subject site regarding sediment transport, surface water run-off, or contaminant fate and transport shall be included in this section.

#### **8.12.2.6.ii Subsurface Conditions**

A section on subsurface conditions shall provide a description of the site conditions observed during previous subsurface investigations, including relevant soil horizons, stratigraphy, presence of groundwater, and other relevant information. A site plan showing the locations of all borings and excavations advanced during previous investigations shall be included in the Figures section of the work plan. A brief description of the anticipated stratigraphic units that may be encountered during the investigation may be included in this subsection if no previous investigations have been conducted at the site.

#### **8.12.2.7 Scope of Activities**

A section on the scope of activities shall briefly describe a list of all anticipated activities to be performed during the investigation including background information research, health and safety requirements that may affect or limit the completion of tasks, drilling, test pit or other excavations, well construction, field data collection, survey data collection, chemical analytical testing, aquifer testing, remediation system pilot tests, and IDW storage and disposal.

#### **8.12.2.8 Investigation Methods**

A section on investigation methods shall provide a description of all anticipated locations and methods for conducting the activities to be performed during the investigation. This section shall include research methods, health and safety practices that may affect the completion of tasks, drilling methods, test pit or other excavation methods, sampling intervals and methods, well construction methods, field data collection methods, geophysical and land survey methods, field screening methods, chemical analytical testing, materials testing, aquifer testing, pilot tests, and other proposed investigation and testing methods. This information may also be summarized in table format, if appropriate.

#### **8.12.2.9 Monitoring and Sampling Program**

A section on monitoring and sampling shall provide a description of the groundwater, ambient air, subsurface vapor, remediation system, engineering controls, and other monitoring and sampling programs currently being implemented at the site.

#### **8.12.2.10 Schedule**

A section shall set forth the anticipated schedule for completion of field investigation, pilot testing, and monitoring and sampling activities. In addition, this section shall set forth a schedule for submittal of reports and data to the Department including a schedule for submitting all status reports and preliminary data.



### **8.12.2.11 Tables**

The following summary tables may be included in the investigation work plans, if previous investigations have been conducted at the site:

1. Summaries of regulatory criteria, background, and applicable cleanup levels (may be included in the analytical data tables instead of as separate tables);
2. Summaries of historical field survey location data;
3. Summaries of historical field screening and field parameter measurements of soil, rock, sediments, groundwater, surface water, and air quality data;
4. Summaries of historical soil, rock, or sediment laboratory analytical data shall include the analytical methods, detection limits, and significant data quality exceptions that could influence interpretation of the data;
5. Summaries of historical groundwater elevation and depth to groundwater data. The table shall include the monitoring well depths, the screened intervals in each well, and the dates and times measurements were taken;
6. Summaries of historical groundwater laboratory analytical data. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that could influence interpretation of the data;
7. Summary of historical surface water laboratory analytical data. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that could influence interpretation of the data;
8. Summary of historical air sample screening and chemical analytical data. The data tables shall include the screening instruments used, laboratory analytical methods, detection limits, and significant data quality exceptions that could influence interpretation of the data; and
9. Summary of historical pilot or other test data, if applicable, including units of measurement and types of instruments used to obtain measurements.

Data presented in the tables shall include information on dates of data collection, analytical methods, detection limits, and significant data quality exceptions. The analytical data tables shall include only detected analytes and data quality exceptions that could potentially mask detections.

### **8.12.2.12 Figures**

The following figures shall be included with each investigation work plan for each site, including presentation of data where previous investigations have been conducted. All figures must include an accurate bar scale and a north arrow. An explanation shall be included on each figure for all abbreviations, symbols, acronyms, and qualifiers. All maps shall contain a date of preparation.

1. A vicinity map showing topography and the general location of the site relative to surrounding features and properties;
2. A site plan that presents pertinent site features and structures, underground utilities, well locations, and remediation system locations and details. Off-site well locations and other relevant features shall be included on the site plan, if appropriate. Additional site plans

may be required to present the locations of relevant off-site well locations, structures, and features;

3. Figures showing historical and proposed soil boring or excavation locations and sampling locations;
4. Figures presenting historical soil sample field screening and laboratory analytical data if applicable;
5. Figures presenting the locations of all existing and proposed borings and vapor monitoring well locations;
6. Figures showing all existing and proposed wells and piezometers, presenting historical groundwater elevation data, and indicating groundwater flow directions;
7. Figures presenting historical groundwater laboratory analytical data, if applicable. The chemical analytical data corresponding to each sampling location can be presented in tabular form on the figure or as an isoconcentration map;
8. Figures presenting historical and proposed surface water sample locations and field measurement data, if applicable;
9. Figures presenting historical surface water laboratory analytical data, if applicable;
10. Figures showing historical and proposed air or vapor sampling locations and presenting historical air quality data, if applicable;
11. Figures presenting historical pilot and other testing locations and data, where applicable, including site plans and graphic data presentation; and
12. Figures presenting geologic cross-sections, based on outcrop and borehole data acquired during previous investigations, if applicable.

#### **8.12.2.13 Appendices**

A description of IDW management shall be included as an appendix to the investigation work plan. The results of historical investigations required in this Permit shall be submitted with the investigation work plan as a separate document. Additional appendices may be necessary to present additional data or documentation not listed above.

#### **8.12.3 Investigation Report**

The Permittees shall prepare investigation reports at the Facility using the general outline below. The Investigation Report shall be the reporting mechanism for presenting the results of completed Investigation Work Plans. This Permit Section (8.12.3) describes the minimum requirements for reporting on site investigations. All data collected during each site investigation event in the reporting period shall be included in the reports. In general, interpretation of data shall be presented only in the background, conclusions and recommendations sections of the reports. The other text sections of the reports shall be reserved for presentation of facts and data without interpretation or qualifications. The general report outline is provided below.

### **8.12.3.1 Title Page**

The title page shall include the type of document; Facility name; Area designation; SWMU or AOC name, site, and any other unit name; and the submittal date. A signature block providing spaces for the names and titles of the responsible representatives of the Permittees shall be provided on the title page in accordance with 40 CFR § 270.11(d)(1).

### **8.12.3.2 Executive Summary (Abstract)**

The executive summary or abstract shall provide a brief summary of the purpose, scope, and results of the investigation; site names; location; and area designation. In addition, this section shall include a brief summary of conclusions included in the report based on the investigation data collected and recommendations for future investigation, monitoring, remedial action or site closure.

### **8.12.3.3 Table of Contents**

The table of contents shall list all text sections, subsections, tables, figures, and appendices or attachments included in the report. The corresponding page numbers for the titles of each section of the report shall be included in the table of contents.

### **8.12.3.4 Introduction**

The introduction section shall include the Facility name, area designation, unit location, and unit status (e.g., closed, corrective action). General information on the site usage and status shall be included in this section. A brief description of the purpose of the investigation, the type of site investigation conducted, and the type of results presented in the report also shall be provided in this section.

### **8.12.3.5 Background**

The background section shall describe relevant background information. This section shall briefly summarize historical site uses by the U.S. Government and any other entity, including the locations of current and former site structures and features. A labeled figure shall be included in the document showing the locations of current and former site structures and features. The locations of any subsurface features such as pipelines, underground tanks, utility lines, and other subsurface structures shall be included in the background summary and labeled on the figure, as appropriate. In addition, this section shall include a brief summary of the possible sources of contamination, the history of releases or discharges of contamination, the known extent of contamination, and a general summary of the results of previous investigations including references to previous reports. The references to previous reports shall include page, table, and figure numbers for referenced information. A site plan, showing relevant investigation locations, and summary data tables shall be included in the Figures and Tables sections of the document, respectively.

### **8.12.3.6 Scope of Activities**

A section on the scope of activities shall briefly describe all activities performed during the investigation event including background information research, implemented health and safety

measures that affected or limited the completion of tasks, drilling, test pit or other excavation methods, well construction methods, field data collection, survey data collection, chemical analytical testing, aquifer testing, remediation system pilot tests, and IDW storage or disposal.

#### **8.12.3.7 Field Investigation Results**

A section shall provide a summary of the procedures used and the results of all field investigation activities conducted at the site including the dates that investigation activities were conducted, the type and purpose of field investigation activities performed, field screening measurements, logging and sampling results, pilot test results, construction details, and conditions observed. Field observations or conditions that altered the planned work or may have influenced the results of sampling, testing, and logging shall be reported in this section. The following sections shall be included.

#### **8.12.3.8 Site Conditions**

##### **8.12.3.8.i Surface Conditions**

A section on surface conditions shall provide a description of current site topography, features and structures including a description of topographic drainages, man-made drainages, vegetation, erosional features, and basins. It shall also include a detailed description of current site usage and any current operations at the site. In addition, descriptions of features located in surrounding sites that may have an impact on the subject site regarding sediment transport, surface water run-off, or contaminant fate and transport shall be included in this section.

##### **8.12.3.8.ii General Subsurface Conditions**

A section on subsurface conditions shall provide a description of the general site conditions observed during the subsurface investigations, including relevant soil horizons, stratigraphy, presence of groundwater, and other relevant information. A site plan showing the locations of all borings and excavations advanced during the investigation and, as applicable, previous investigations shall be included in the Figures section of the work plan. A brief description of the stratigraphic units that were observed during the investigation shall be included in this subsection if no previous investigations have been conducted at the site.

#### **8.12.3.9 Exploratory Drilling or Excavation Investigations**

A section shall describe the locations, methods, and depths of subsurface explorations. The description shall include the types of equipment used, the logging procedures, the soil or rock classification system used to describe the observed materials, exploration equipment decontamination procedures, and conditions encountered that may have affected or limited the investigation.

A description of the site conditions observed during subsurface investigation activities shall be included in this section, including soil horizon and stratigraphic information. Site plans showing the locations of all borings and excavations shall be included in the Figures Section of the report. Boring and test pit logs for all exploratory borings and test pits shall be presented in an appendix or attachment to the report.

#### **8.12.3.10 Exploratory and Monitoring Well Boring Geophysical Logging**

A section shall describe the methods, dates of measurement, depth intervals measured, and the results of geophysical logging. The relative merits and limitations of each geophysical logging method employed shall be discussed, along with any field conditions or instrument malfunctions that occurred that may have affected the results of the geophysical logging.

#### **8.12.3.11 Subsurface Conditions**

A section on subsurface conditions shall describe known subsurface lithology and structures, based on observations made during the current and previous subsurface investigations, including interpretation of geophysical logs and as-built drawings of man-made structures. A description of any known locations of pipelines and utility lines and observed geologic structures shall also be included in this section. A site plan showing boring and excavation locations and the locations of the site's above- and below-ground structures shall be included in the Figures Section of the report. In addition, cross-sections shall be constructed, if appropriate, to provide additional visual presentation of site or regional subsurface conditions.

#### **8.12.3.12 Monitoring Well Construction and Boring or Excavation Abandonment**

A section shall describe the methods and details of monitoring well construction and the methods used to abandon or backfill exploratory borings and excavations. The description shall include the dates of well construction, boring abandonment, or excavation backfilling. In addition, well construction diagrams shall be included in an appendix or attachment with the associated boring logs for monitoring well borings. The Permittees may submit well abandonment reports as an appendix to the investigation report.

#### **8.12.3.13 Groundwater Conditions**

A section shall describe groundwater conditions observed beneath the subject site and relate local groundwater conditions to regional groundwater conditions. A description of the depths to water, aquifer thickness, and groundwater flow directions shall be included in this section for perched and regional groundwater, as appropriate to the investigation. Figures showing well locations, surrounding area, and groundwater elevations and flow directions for each hydrologic zone shall be included in the Figures Section of the report.

#### **8.12.3.14 Surface Water Conditions**

A section shall describe surface water conditions and include a description of surface water run-off, drainage, surface water sediment transport, and contaminant transport in surface water as suspended load and as a dissolved phase in surface water via natural and man-made drainages, if applicable. A description of contaminant fate and transport shall be included, if appropriate.

#### **8.12.3.15 Surface Air and Subsurface Vapor Conditions**

A section shall describe surface air and subsurface vapor monitoring and sampling methods used during the site investigation. It shall also describe observations made during the site investigation regarding subsurface flow pathways and the subsurface air-flow regime.

### **8.12.3.16 Materials Testing Results**

A section shall discuss the materials testing results, such as core permeability testing, grain size analysis, or other materials testing results. Sample collection methods, locations, and depths shall also be included. Corresponding summary tables shall be included in the Tables Section of the report.

### **8.12.3.17 Pilot Testing Results**

A section shall discuss the results of any pilot tests. Pilot tests are typically conducted after initial subsurface investigations are completed and the need for additional investigation or remediation has been evaluated. Pilot tests, including aquifer tests and remediation system pilot tests, shall be addressed through separate work plans and pilot test reports. The format for pilot test work plans and reports shall be approved by the Department prior to submittal.

### **8.12.3.18 Regulatory Criteria**

A section shall set forth the cleanup standards, risk-based screening levels, and risk-based cleanup goals for each pertinent medium at the subject site. The appropriate cleanup levels for each site shall be included if site-specific levels have been established at separate Facility sites or units. A table summarizing the applicable cleanup standards or levels or inclusion of applicable cleanup standards or levels in the data tables shall be included as part of the document. The risk assessment, if conducted, shall be presented in a separate document or in an appendix to this report. If cleanup or screening levels calculated in the Department-approved risk evaluation are employed, the risk evaluation document shall be referenced and shall include pertinent page numbers for referenced information.

### **8.12.3.19 Site Contamination**

A section shall provide a description of sampling intervals and methods for detection of surface and subsurface contamination in soils, rock, sediments, groundwater, and surface water, and as vapor-phase contamination. Only factual information shall be included in this section. Interpretation of the data shall be reserved for the summary and conclusions sections of the report. Tables summarizing all sampling, testing, and screening results for detected contaminants shall be prepared in a format approved by the Department. The tables shall be presented in the Tables Section of the report.

#### **8.12.3.19.i Soil, Rock, and Sediment Sampling**

A section shall describe the sampling of soil, rock, and sediment. It shall include the dates, locations and methods of sample collection; sampling intervals; sample logging methods; screening sample selection methods; and laboratory sample selection methods including the collection depths for samples submitted for laboratory analyses. A site plan showing the sample locations shall be included in the Figures Section of the report.

#### **8.12.3.19.ii Soil, Rock, and Sediment Sample Field Screening Results**

A section shall describe the field screening methods used during the investigation and the field screening results. Field screening results also shall be presented in summary tables in the Tables

Section of the document. The limitations of field screening instrumentation and any conditions that influenced the results of field screening shall be discussed in this section.

#### 8.12.3.19.iii Soil, Rock, and Sediment Sampling Analytical Results

A section shall summarize the results of laboratory analysis for soil, rock, and sediment samples. It shall also describe the analytical methods used and provide a comparison of the analytical results to background levels, cleanup standards, or established cleanup levels for the site. The laboratory results also shall be presented in summary tables in the Tables Section of the document. Field conditions and sample collection methods that could potentially affect the analytical results shall be described in this section. If appropriate, soil analytical data shall be presented with sample locations on a site plan and included in the Figures Section of the report.

#### 8.12.3.19.iv Groundwater Sampling

A section on groundwater sampling shall describe the dates, locations, depths, and methods of sample collection; methods for sample logging; and methods for screening and laboratory sample selection. A map showing all sites and surrounding area well locations shall be included in the Figures Section of the report.

#### 8.12.3.19.v Groundwater General Chemistry

A section on the general groundwater chemistry shall describe the results of measurement of field purging parameters and field analytical measurements. Field parameter measurements and field analytical results also shall be presented in summary tables in the Tables Section of the document. The limitations of field measurement instrumentation and any conditions that may have influenced the results of field screening shall be discussed in this section. As determined by the Permittees and the Department, relevant water chemistry concentrations shall be presented as data tables or as isoconcentration contours on a map included in the Figures Section of the report.

#### 8.12.3.19.vi Groundwater Chemical Analytical Results

A section shall summarize the results of groundwater chemical analyses. It shall describe the groundwater chemical analytical methods and analytical results. It shall also provide a comparison of the data to cleanup standards or established cleanup levels for the site. The rationale or purpose for altering or modifying the groundwater sampling program outlined in the site investigation work plan shall also be provided in this section. Field conditions shall be described in this section that may have affected the analytical results during sample collection. Tables summarizing the groundwater laboratory, field, and field sample QA/QC chemical analytical data; applicable cleanup levels; and modifications to the groundwater sampling program shall be provided in the Tables Section of the report. Relevant contaminant concentrations shall be presented as individual analyte concentrations, data tables, or as isoconcentration contours on a map included in the Figures Section of the report.

#### 8.12.3.19.vii Surface Water Sampling

A section shall describe the surface water sampling and shall include the dates, times, locations, depths, and methods of sample collection. It shall also describe methods for sample logging, sample-screening methods, and laboratory sample selection methods. A map showing all surface-water sampling locations shall be included in the Figures Section of the report.

#### 8.12.3.19.viii Surface Water General Chemistry

A section on the surface water general chemistry shall describe the results of measurement of field parameters and field analytical measurements. Field parameter measurements and field analytical results also shall be presented in summary tables in the Tables Section of the document. The limitations of field measurement instrumentation and any conditions that influenced the results of field screening shall be discussed in this Section. Relevant water chemistry concentrations shall be presented as data tables on a map included in the Figures Section of the report.

#### 8.12.3.19.ix Surface Water Chemical Analytical Results

A section shall summarize the results of surface water chemical analyses. It shall describe the analytical methods and analytical results, and provide a comparison of the data to the cleanup standards or established background or cleanup levels for the site. The rationale or purpose for altering or modifying the surface-water sampling program outlined in the site investigation work plan also shall be provided in this section. Field conditions that may have affected the analytical results during sample collection shall be described in this section. Tables summarizing the surface water laboratory, field, and analytical field sample QA/QC analytical data; applicable cleanup levels; and modifications to the surface-water sampling program shall be provided in the Tables Section of the report. Relevant contaminant concentrations shall be presented as individual analyte concentrations or as data tables on a map included in the Figures Section of the report.

#### 8.12.3.19.x Air and Subsurface Vapor Sampling

A section shall describe the air and subsurface vapor sampling. It shall describe the dates, locations, depths or elevations above ground surface, methods of sample collection, methods for sample logging, and methods for laboratory sample selection. A map showing all air sampling locations shall be provided in the Figures Section of the report.

#### 8.12.3.19.xi Air and Subsurface Vapor Field Screening Results

A section shall describe the air and subsurface vapor field screening results. It shall describe the field screening methods used for ambient air and subsurface vapors during the investigation. Field screening results shall also be presented in summary tables in the Tables Section of the report. The locations of ambient air and subsurface vapor screening sample collection shall be presented on a site plan included in the Figures Section of the report. The limitations of field screening instrumentation and any conditions that influenced the results of field screening shall be discussed in this Section.

#### 8.12.3.19.xii Air and Subsurface Vapor Laboratory Analytical Results

A section shall describe the results of air and subsurface vapor laboratory analysis. It shall describe the air sampling laboratory analytical methods and analytical results, and provide a comparison of the data to emissions standards or established cleanup or emissions levels for the site. The rationale or purpose for altering or modifying the air monitoring or sampling program outlined in the site investigation work plan also shall be provided in this section. Field conditions that may have affected the analytical results during sample collection shall be described in this section. Tables summarizing the air sample laboratory, field, and analytical field sample QA/QC data; applicable cleanup levels or emissions standards; and modifications to the air sampling program shall be provided in the Tables Section of the report. Relevant contaminant concentrations shall be presented as individual analyte concentrations, data tables, or as isoconcentration contours on a map included in the Figures Section of the report.



### **8.12.3.20 Conclusions**

A section shall provide a brief summary of the investigation activities and a discussion of the conclusions of the investigation conducted at the site. In addition, this section shall provide a comparison of the results to applicable cleanup or screening levels, and to relevant historical investigation results and analytical data. Potential receptors, including groundwater, shall be identified and discussed. An explanation shall be provided with regard to data gaps. A risk assessment may be included as an appendix to the investigation report; however, the risk assessment shall be presented in the Risk Assessment format described in Permit Section 8.12.5. References to the risk assessment shall be presented only in the summary and conclusions sections of the Investigation Report.

### **8.12.3.21 Recommendations**

A section shall discuss the need for further investigation, corrective measures, risk assessment and monitoring, or recommendations for corrective action completed, based on the conclusions provided in the Conclusions section. It shall include explanations regarding additional sampling, monitoring, and site closure. A corresponding schedule for further action regarding the site shall also be provided. No action recommendations shall include the anticipated schedule for submittal of a petition for a permit modification.

### **8.12.3.22 Tables**

A section shall provide the following summary tables as applicable:

1. Tables summarizing regulatory criteria, background levels, and applicable cleanup levels (this information may be included in the analytical data tables instead of as separate tables);
2. Tables summarizing field survey location data. Separate tables shall be prepared for well locations and individual medium sampling locations except where the locations are the same for more than 1 medium;
3. Tables summarizing field screening and field parameter measurements of soil, rock, sediments, groundwater, surface water, and air quality data;
4. A table summarizing soil, rock, and/or sediment laboratory analytical data. It shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data;
5. A table summarizing the groundwater elevations and depths to groundwater. The table shall include the monitoring well depths and the screened intervals in each well;
6. A table summarizing the groundwater laboratory analytical data. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data;
7. A table summarizing the surface water laboratory analytical data. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data;
8. A table summarizing the air sample screening and laboratory analytical data. The data tables shall include the screening instruments used, laboratory analytical methods,

detection limits, and significant data quality exceptions that would influence interpretation of the data;

9. Tables summarizing the pilot test data, if applicable, including units of measurement and types of instruments used to obtain measurements; and
10. A table summarizing any materials test data.

With prior approval from the Department, the Permittees may combine one or more of the tables. Data presented in the tables shall include the current data, dates of data collection, analytical methods, detection limits, and significant data quality exceptions. The summary analytical data tables shall include only detected analytes and data quality exceptions that could potentially mask detections.

### **8.12.3.23 Figures**

A section shall provide the following figures as applicable:

1. A vicinity map showing topography and the general location of the subject site relative to surrounding features and properties;
2. A site plan that presents any pertinent site features and structures, underground utilities, well locations, and remediation system location(s) and details. Off-site well locations and other relevant features shall be included on the site plan. Additional site plans may be required to present the locations of relevant off-site well locations, structures and features;
3. Figures showing boring or excavation locations and sampling locations;
4. Figures presenting soil sample field screening and laboratory analytical data;
5. Figures displaying the locations of all newly installed and existing wells and borings;
6. Figures presenting monitoring well and piezometer locations, groundwater elevation data, and groundwater flow directions;
7. Figures presenting groundwater laboratory analytical data, including any past data requested by the Department. The laboratory analytical data corresponding to each sampling location may be presented in table form on the figure or as an isoconcentration map;
8. Figures presenting surface water sample locations and field measurement data including any past data requested by the Department;
9. Figures presenting surface water laboratory analytical data including any past data requested by the Department. The laboratory analytical data corresponding to each sampling location may be presented in table form on the figure;
10. Figures showing air sampling locations and presenting air quality. The field screening or laboratory analytical data corresponding to each sampling location may be presented in table form on the figure or as an isoconcentration map;
11. Figures presenting geologic cross-sections based on outcrop and borehole data; and
12. Figures presenting pilot test locations and data, where applicable, including site plans or graphic data presentation.

All figures shall include an accurate bar scale and a north arrow. An explanation shall be provided on each figure for all abbreviations, symbols, acronyms, and qualifiers. All maps shall have a date.

#### **8.12.3.24 Appendices**

Each investigation report shall include the following appendices. Additional appendices may be necessary to present data or documentation not listed below.

##### **8.12.3.24.i Field Methods**

An appendix shall provide detailed descriptions of the methods used to acquire field measurements of each medium that was surveyed or tested during the investigation. This appendix shall include exploratory drilling or excavation methods, the methods and types of instruments used to obtain field screening, field analytical or field parameter measurements, instrument calibration procedures, sampling methods for each medium investigated, decontamination procedures, sample handling procedures, documentation procedures, and a description of field conditions that affected procedural or sample testing results. Methods of measuring and sampling during pilot tests shall be reported in this appendix, if applicable. Geophysical logging methods shall be discussed in a separate section of this appendix. Investigation derived waste (IDW) storage and disposal methods shall also be discussed in this appendix. Copies of IDW disposal documentation shall be provided in a separate appendix.

##### **8.12.3.24.ii Boring/Test Pit Logs and Well Construction Diagrams**

An appendix shall provide boring logs, test pit logs, or other excavation logs, and well construction details. In addition, a key to symbols and a soil or rock classification system shall be included in this appendix. Geophysical logs shall be provided in a separate section of this appendix.

##### **8.12.3.24.iii Analytical Program**

An appendix shall discuss the analytical methods, a summary of data quality objectives, and the data quality review procedures. A summary of data quality exceptions and their effect on the acceptability of the field and laboratory analytical data with regard to the investigation and the site status shall be included in this appendix along with references to the case narratives provided in the laboratory reports.

##### **8.12.3.24.iv Analytical Reports**

An appendix shall provide the contract laboratory final analytical data reports generated for the investigation. The reports shall include all chain-of-custody records and Level II QA/QC results provided by the laboratory. The final laboratory reports and data tables shall be provided electronically in a format approved by the Department. Paper copies (or copies electronically scanned in PDF format) of all chain-of-custody records shall be provided with the reports.

##### **8.12.3.24.v Other Appendices**

Other appendices containing additional information shall be included as required by the Department or as otherwise appropriate.

#### **8.12.4 Periodic Monitoring Report**

The Permittees shall use the following guidance for preparing periodic monitoring reports under this Permit Part. The reports shall present the reporting of periodic groundwater, surface water,

vapor, and remediation system monitoring at the Facility. The following sections provide a general outline for monitoring reports, and also provide the minimum requirements for reporting for specific Facility sites, areas, and regional monitoring. All data collected during each monitoring and sampling event in the reporting period shall be included in the reports. In general, interpretation of data shall be presented only in the background, conclusions, and recommendations sections of the reports. The other text sections of the reports shall be reserved for presentation of facts and data without interpretation or qualifications.

#### **8.12.4.1 Title Page**

The title page shall include the type of document; Facility name; area designation; SWMU or AOC name, site, watershed, and any other unit name; and the submittal date. A signature block providing spaces for the names and titles of the responsible representatives of the Permittees shall be provided on the title page in accordance with 40 CFR § 270.11(d)(1).

#### **8.12.4.2 Executive Summary (Abstract)**

The executive summary or abstract shall provide a brief summary of the purpose, scope, and results of the monitoring conducted at the subject site during the reporting period. The area (e.g., Plume-front, Facility-wide) SWMU, AOC and site name, location, and/or area designation shall be included in the executive summary. In addition, this section shall include a brief summary of conclusions based on the monitoring data collected.

#### **8.12.4.3 Table of Contents**

The table of contents shall list all text sections, subsections, tables, figures, and appendices or attachments included in the report. The corresponding page numbers for the titles of each section of the report shall be included in the table of contents.

#### **8.12.4.4 Introduction**

The introduction section shall include the Facility name, area designation physical area and/or, unit location, and unit status as applicable (e.g. closed, corrective action). General information on the site usage and status shall be included in this section. A brief description of the purpose of the monitoring, type of monitoring conducted, and the type of results presented in the report also shall be provided in this section.

#### **8.12.4.5 Scope of Activities**

A section on the scope of activities shall briefly describe all activities performed during the monitoring event or reporting period including field data collection, analytical testing, remediation system monitoring, if applicable, and purge/decontamination water storage and disposal.

#### **8.12.4.6 Regulatory Criteria**

A section on regulatory criteria shall provide information regarding applicable cleanup standards, risk-based screening levels and risk-based cleanup goals for the subject site. A separate table summarizing the applicable screening levels or standards or inclusion of the applicable cleanup

standards or screening levels in the data tables can be substituted for this section. The appropriate cleanup or screening levels for each site shall be included, if site-specific levels have been established at separate sites. Risk-based evaluation procedures, if used to calculate cleanup or screening levels, must either be included as an attachment or referenced. The specific document and page numbers must be included for all referenced materials.

#### **8.12.4.7 Monitoring Results**

A section shall provide a summary of the results of monitoring conducted at the site. This section shall include the dates and times that monitoring was conducted, the measured depths to groundwater, directions of groundwater flow, field air and water quality measurements, contaminant surveys, static pressures, field measurements, and a comparison to previous monitoring results. Field observations or conditions that may influence the results of monitoring shall be reported in this section. Tables summarizing vapor-monitoring parameters, groundwater elevations, depths to groundwater measurements, and other field measurements can be substituted for this section. The tables shall include all information required in Permit Section 8.12.4.11.

#### **8.12.4.8 Analytical Data Results**

A section shall discuss the results of the chemical analyses. It shall provide the dates of sampling, the analytical methods, and the analytical results. It shall also provide a comparison of the data to previous results and to background levels, cleanup standards, or established cleanup levels for the site. The rationale or purpose for altering or modifying the monitoring and sampling program shall be provided in this section. A table summarizing the laboratory analytical data, QA/QC data, applicable cleanup levels, and modifications to the sampling program can be substituted for this section. The tables shall include all information required in Permit Section 8.12.4.11.

#### **8.12.4.9 Remediation System Monitoring**

A section shall discuss the remediation system monitoring. It shall summarize the remediation system's capabilities and performance. It shall also provide monitoring data, treatment system discharge sampling requirements, and system influent and effluent sample analytical results. The dates of operation, system failures, and modifications made to the remediation system during the reporting period shall also be included in this section. A summary table may be substituted for this section. The tables shall include all information required in Permit Section 8.12.4.11.

#### **8.12.4.10 Summary**

A summary section shall provide a discussion and conclusions of the monitoring conducted at the site. In addition, this section shall provide a comparison of the results to applicable cleanup levels, and to relevant historical monitoring and laboratory analytical data. An explanation shall be provided with regard to data gaps. A discussion of remediation system performance, monitoring results, modifications, if applicable, and compliance with discharge requirements shall be provided in this section. Recommendations and explanations regarding future monitoring, remedial actions, or site closure, if applicable, shall also be included in this section.

#### **8.12.4.11 Tables**

A section shall provide the following summary tables for the media sampled:

1. A table summarizing the regulatory criteria (a Regulatory Criteria text section may be substituted for this table or the applicable cleanup levels may be included in the analytical data tables);
2. A table summarizing groundwater elevations and depths to groundwater data. The table shall include the monitoring well depths, the screened intervals in each well, and the dates and times of measurements;
3. A table summarizing field measurements of surface water quality data;
4. A table summarizing field measurements of vapor monitoring data (must include historical vapor monitoring data as described above);
5. A table summarizing field measurements of groundwater quality data (must include historical water quality data as described above);
6. A table summarizing vapor sample analytical data (must include historical vapor sample analytical data as described above);
7. A table summarizing surface water analytical data (must include historical surface water analytical data as described above);
8. A table summarizing groundwater analytical data (must include historical groundwater analytical data as described above); and
9. A table summarizing remediation system monitoring data, if applicable (must include historical remediation system monitoring data as described above).

With prior approval from the Department, the Permittees may combine one or more of the tables. Data presented in the tables shall include the current sampling and monitoring data plus data from the three previous monitoring events or, if data from less than three monitoring events is available, data acquired during previous investigations. Remediation system monitoring data also shall be presented. The dates of data collection shall be included in the tables. Summary tables may be substituted for portions of the text. The analytical data tables shall include only detected analytes and data quality exceptions that could potentially mask detections.

#### **8.12.4.12 Figures**

The section shall include the following figures:

1. A vicinity map showing topography and the general location of the subject site relative to surrounding features or properties;
2. A site plan that presents pertinent site features and structures, well and piezometer locations, and remediation system location(s) and features. Off-site well locations and pertinent features shall be included on the site plan, if practical. Additional site plans may be required to present the locations of relevant off-site well locations, structures, and features;
3. Figures presenting the locations of piezometer, monitoring and other well locations, groundwater elevation data, and groundwater flow directions;

4. Figures presenting groundwater analytical data for the current monitoring event. The analytical data corresponding to each sampling location may be presented as individual concentrations or in table form on the figure or as an isoconcentration map;
5. Figures presenting surface water sampling locations and analytical data for the current monitoring period if applicable;
6. Figures presenting vapor sampling locations and analytical data for the current monitoring event if applicable. The analytical data corresponding to each sampling location may be presented as individual concentrations or in table form on the figure or as an isoconcentration map; and
7. Figures presenting geologic cross-sections based on outcrop and borehole data, if applicable.

All figures shall include an accurate bar scale and a north arrow. An explanation shall be provided on each figure for all abbreviations, symbols, acronyms, and qualifiers. All figures shall have a date.

#### **8.12.4.13 Appendices**

Each monitoring report shall include the following appendices. Additional appendices may be necessary to present data or documentation not listed below.

##### **8.12.4.13.i Field Methods**

An appendix shall include the methods used to acquire field measurements of groundwater elevations, vapor and water quality data, and vapor, surface water and groundwater samples. It shall include the methods and types of instruments used to measure depths to water, air or headspace parameters, flow measurements, and water quality parameters. In addition, decontamination, well purging techniques, well sampling techniques, and sample handling procedures shall be provided in this appendix. Methods of measuring and sampling remediation systems shall be reported in this appendix, if applicable. Purge and decontamination water storage and disposal methods shall also be presented in this appendix. Copies of purge and decontamination water disposal documentation shall be provided in a separate appendix, if applicable.

##### **8.12.4.13.ii Analytical Program**

An appendix shall discuss the analytical program. It shall include the analytical methods, a summary of data quality objectives, and data quality review procedures. A summary of data quality exceptions and their effect on the acceptability of the analytical data with regard to the monitoring event and the site status shall be included in this appendix along with references to case narratives provided in the laboratory reports.

##### **8.12.4.13.iii Analytical Reports**

An appendix shall provide the analytical reports and shall include the contract laboratory final chemical analytical data reports generated during this reporting period. The reports must include all chain-of-custody records and Level II QA/QC results provided by the laboratory. The laboratory final reports and data tables shall be provided electronically in a format approved by

the Department. Paper copies (or electronically scanned in PDF format) of all chain-of-custody records shall be provided with the reports.

### **8.12.5 Risk Assessment Report**

The Permittees shall prepare risk assessment reports for sites requiring corrective action at the Facility using the format listed below. This Permit Section (8.12.5) provides a general outline for risk assessments and also lists the minimum requirements for describing risk assessment elements. In general, interpretation of data shall be presented only in the Background, Conceptual Site Model, and Conclusions and Recommendations Sections of the reports. The other text sections of the Risk Assessment report shall be reserved for presentation of sampling results from all investigations, conceptual and mathematical elements of the risk assessment, and presentations of toxicity information and screening values used in the risk assessment. The general risk assessment outline, applicable to both human health and ecological risk assessments, is provided below.

#### **8.12.5.1 Title Page**

The title page shall include the type of document; Facility name; Area designation; SWMU or AOC name, site, and any other unit name; and the submittal date. A signature block providing spaces for the names and titles of the responsible representatives of the Permittees shall be provided on the title page in accordance with 40 CFR § 270.11(d)(1).

#### **8.12.5.2 Executive Summary (Abstract)**

The executive summary or abstract section shall provide a brief summary of the purpose and scope of the risk assessment of the subject site. The executive summary shall also briefly summarize the conclusions of the risk assessment. The Facility, SWMU, AOC, and site names; location; and Area designation shall be included in the executive summary.

#### **8.12.5.3 Table of Contents**

The table of contents shall list all text sections, subsections, tables, figures, and appendices or attachments included in the risk assessment. The corresponding page numbers for the titles of each unit of the report shall be included in the table of contents.

#### **8.12.5.4 Introduction**

The introduction section shall include the Facility name, area designation, unit location, and unit status (e.g., closed, corrective action). General information on the current site usage and status shall be included in this section.

#### **8.12.5.5 Background**

The background section shall describe relevant background information. This section shall briefly summarize historical site uses by the U.S. Government and any other entity, including the locations of current and former site structures and features. A labeled figure shall be included in the document showing the locations of current and former site structures and features.



#### **8.12.5.6 Site Description**

A section shall describe current site topography, features and structures including topographic drainages, man-made drainages, erosional features, current site uses, and other data relevant to assessing risk at the site. Depth to groundwater and direction of groundwater flow shall be included in this section. The presence and location of surface water bodies such as any springs or wetlands shall be noted in this section. Photographs of the site may be incorporated into this section. Ecological features of the site shall be described here, including type and amount of vegetative cover, observed and expected wildlife receptors, and level of disturbance of the site. A topographical map of the site and vicinity of the site showing habitat types, boundaries of each habitat, and any surface water features shall be included in the Figures Section of the document.

#### **8.12.5.7 Sampling Results**

A section shall discuss the results of the sampling at the site. It shall include a description of the history of releases of contaminants, the known and possible sources of contamination, and the vertical and lateral extent of contamination present in each medium. This section shall include summaries of sampling results of all investigations including site plans (included in the Figures Section of the report) showing locations of detected contaminants. This section shall reference pertinent figures, data summary tables, and references in previous reports. References to previous reports shall include page, table, and figure numbers for referenced information.

Summaries of sampling data shall include for each constituent: the maximum value detected, the detection limit, and for constituents following normal or log-normal distributions with sample sizes greater than eight, the upper confidence level (UCL) of the mean calculated at a 95% confidence level. Background values used for comparison to inorganic constituents at the site shall be presented here. The table of background values should appear in the Tables Section of the document and include actual values used as well as the origin of the values (e.g. Facility-wide, UCL, upper tolerance level (UTL)). This section shall also include a discussion of how “non-detect” sample results were handled in the averaging of data.

#### **8.12.5.8 Conceptual Site Model**

A section shall present the conceptual site model. It shall include information on the expected fate and transport of contaminants detected at the site. This section shall provide a list of all sources of contamination at the site. Sources that are no longer considered to be ongoing but represent the point of origination for contaminants transported to other locations shall be included. The discussion of fate and transport shall address potential migration of each contaminant in each medium, potential breakdown products and their migration, and anticipated pathways of exposure for human or ecological receptors. Diagrammatic representations of the conceptual site model shall appear in the Figures Section of the document.

For human health risk assessments, the conceptual site model shall include the current and reasonably foreseeable future land use and residential land use for all risk assessments. All values for exposure parameters and the source of those values shall be included in table format and presented in the Tables Section of the document.

Conceptual site models presented for ecological risk assessments shall identify assessment endpoints and measurement receptors for the site. The discussion of the model shall explain how

the measurement receptors for the site are protective of the wildlife receptors identified by the Permittees in the Site Description Section (see Permit Section 8.12.5.6).

#### **8.12.5.9 Risk Screening Levels**

A section shall present the actual screening values used for each contaminant for comparison to all human health and ecological risk screening levels. The Department's SSLs for residential and industrial soil shall be used to screen soil for human health using EPA's Risk Assessment Guidance for Superfund (RAGS), Volume I, Part A, 1989 as updated. For those contaminants not appearing on the Department's SSL table, the EPA Region 6 soil screening value adjusted to meet the Department's risk goal of  $10^{-5}$  for total risk for carcinogens shall be used to screen the site for human health risks. Screening for ecological risk shall be conducted using U.S. EPA's ECO-SSLs, or derive a screening level using the methodology in the Department's Guidance for Assessing Ecological Risks Posed by Chemicals: Screening-Level Ecological Risk Assessment. (Version 2.0)(July 2008). If no valid toxicological studies exist for a particular receptor or contaminant, the contaminant/receptor combination shall be addressed using qualitative methods. If a Department-approved site-specific risk scenario is used for the human health risk assessment, this section shall include all toxicity information and exposure assessment equations used for the site-specific scenario as well as the sources for that information. Other regulatory levels applicable to screening the site, such as drinking water Maximum Contaminant Levels (MCLs), shall also be included in this section.

#### **8.12.5.10 Risk Assessment Results**

A section shall present all risk values, hazard quotients (HQ), and HIs for human health based on current and reasonably foreseeable future land use. Where the current or reasonably foreseeable future land use is not residential, risk values, HQs, and HIs for a residential land use scenario shall also be calculated and reported. The residential scenario shall be used for comparison purposes only, unless the land use becomes residential. This section shall also present the HQ and HI for each contaminant for each ecological receptor.

##### **8.12.5.10.i Uncertainty analysis**

A section shall include discussion of qualitative, semi-quantitative, and quantitative uncertainty in the risk assessment and estimate the potential impact of the various uncertainties.

#### **8.12.5.11 Conclusions and Recommendations**

A section shall include the interpretation of the results of the risk assessment and any recommendations for future disposition of the site. This section may include additional information and considerations that the Permittees believe are relevant to the analysis of the site.

#### **8.12.5.12 Tables**

A section shall provide the following summary tables, as appropriate:

1. A table presenting background values used for comparison to inorganic constituents at the site. The table shall include actual values used as well as the origin of the values (Facility-wide, UCL, UTL, or maximum);

2. A table summarizing sampling data shall include, for each constituent detected above background, the maximum value detected, the detection limit, and for constituents following normal or log-normal distributions with sample sizes greater than eight, the UCL of the mean calculated at a 95% confidence level;
3. A table of all screening values used and the sources of those values;
4. A table presenting all risk values, HQs, and HIs under current and reasonably foreseeable future land use for human health;
5. If residential use is not a current or reasonably foreseeable future land use, a table presenting all risk values, HQs, and HIs under a residential land use scenario for human health shall be included for comparison purposes;
6. A table presenting the HQ and HI for each contaminant for each ecological receptor; and
7. A table presenting values for exposure parameters and the source of the values.

With prior approval from the Department, the Permittees may combine one or more of the tables. Data presented in the summary tables shall include information on detection limits and significant data quality exceptions. The analytical data tables shall include only detected analytes and data quality exceptions that could potentially mask detections.

#### **8.12.5.13 Figures**

A section shall present the following figures for each site, as appropriate:

1. A vicinity map showing topography and the general location of the subject site relative to surrounding features or properties;
2. For human health risk assessments, a site plan that presents pertinent site features and structures, underground utilities, well locations, and remediation system location(s) and its details. Off-site well locations and other relevant features shall be included on the site plan if practical. Additional site plans may be required to present the locations of relevant off-site well locations, structures, and features;
3. For ecological risk assessments, a topographical map of the site and vicinity of the site showing habitat types, boundaries of each habitat, and any surface water features; and
4. Conceptual site model diagrams for both human health and ecological risk assessments.

With prior approval from the Department, the Permittees may combine one or more of the figures. All figures shall include an accurate bar scale and a north arrow. An explanation shall be provided on each figure for all abbreviations, symbols, acronyms, and qualifiers.

#### **8.12.5.14 Appendices**

Each risk assessment report shall include appendices containing supporting data. Appendices may include the results of statistical analyses of data sets and comparisons of data, full sets of results of all sampling investigations at the site, or other data as appropriate.

### **8.12.6 Corrective Measures Evaluation Report**

The Permittees shall prepare corrective measures evaluations for sites requiring corrective measures using the format listed below. This Permit Section (8.12.6) provides a general outline for corrective measures evaluations and also lists the minimum requirements for describing corrective measures when preparing these documents. All investigation summaries, site condition descriptions, corrective action goals, corrective action options, remedial options selection criteria, and schedules shall be included in the corrective measures evaluations. In general, interpretation of historical investigation data and discussions of prior interim activities shall be presented only in the background sections of the corrective measures evaluations. At a minimum, detections of contaminants encountered during previous site investigations shall be presented in the corrective measures evaluations in table format with an accompanying site plan showing sample locations. The other text sections of the corrective measures evaluations shall be reserved for presentation of corrective action-related information regarding anticipated or potential site-specific corrective action options and methods relevant to the project. The general corrective measures evaluation outline is provided below.

#### **8.12.6.1 Title Page**

The title page shall include:

1. The type of document;
2. Facility name;
3. Area designation;
4. SWMU or AOC name, site, and any other unit name; and
5. The submittal date.

A signature block providing spaces for the names and titles of the responsible representatives of the Permittees shall be provided on the title page in accordance with 40 CFR § 270.11(d)(1).

#### **8.12.6.2 Executive Summary (Abstract)**

This executive summary or abstract shall provide a brief summary of the purpose and scope of the corrective measures evaluation to be conducted at the subject site. The executive summary or abstract shall also briefly summarize the conclusions of the evaluation. The SWMU, AOC, and site names, location, and Area designation shall be included in the executive summary.

#### **8.12.6.3 Table of Contents**

The table of contents shall list all text sections, subsections, tables, figures, and appendices or attachments included in the corrective measures evaluation. The corresponding page numbers for the titles of each section of the report shall be included in the table of contents.

#### **8.12.6.4 Introduction**

The Introduction Section shall include the Facility name, Area designation, site location, and site status (e.g. closed, corrective action). General information on the current site usage and status

shall be included in this Section. A brief description of the purpose of the corrective measures evaluation and the corrective action objectives for the project also shall be provided in this Section.

#### **8.12.6.5 Background**

The Background Section shall describe the relevant background information. This Section shall briefly summarize historical site uses by the U.S. Government and any other entity, including the locations of current and former site structures and features. A labeled figure shall be included in the document showing the locations of current and former site structures and features. The locations of any subsurface features such as pipelines, underground tanks, utility lines, and other subsurface structures shall be included in this Section and labeled on the site plan, as appropriate.

This Section shall include contaminant and waste characteristics, a brief summary of the history of contaminant releases, known and possible sources of contamination, and the vertical and lateral extent of contamination present in each medium. This Section shall include brief summaries of results of previous investigations, including references to pertinent figures, data summary tables, and text in previous reports. References to previous reports shall include page, table, and figure numbers for referenced information. Summary tables and site plans showing relevant investigation locations shall be referenced and included in the Tables and Figures Sections of the document, respectively.

#### **8.12.6.6 Site Conditions**

##### **8.12.6.6.i Surface Conditions**

A section on surface conditions shall describe current and historic site topography, features, and structures, including a description of topographic drainages, man-made drainages, vegetation, and erosional features. It shall also include a description of current uses of the site and any current operations at the site. This section shall also include a description of those features that could potentially influence corrective action option selection or implementation such as archeological sites, wetlands, or other features that may affect remedial activities. In addition, descriptions of features located in surrounding sites that may have an effect on the subject site regarding sediment transport, surface water run-off or contaminant transport shall be included in this section. A site plan displaying the locations of all pertinent surface features and structures shall be included in the Figures Section of the corrective measures evaluation.

##### **8.12.6.6.ii Subsurface Conditions**

A section on subsurface conditions shall describe the site conditions observed during previous subsurface investigations. It shall include relevant soil horizon and stratigraphic information, groundwater conditions, fracture data, and subsurface vapor information. A site plan displaying the locations of all borings and excavations advanced during previous investigations shall be included in the Figures Section of the corrective measures evaluation. A brief description of the stratigraphic units anticipated to be present beneath the site may be included in this section if stratigraphic information is not available from previous investigations conducted at the site.

### **8.12.6.7 Potential Receptors**

#### **8.12.6.7.i Sources**

A section shall provide a list of all sources of contamination at the subject site where corrective measures are to be considered or required. Sources that are no longer considered to be releasing contaminants at the site, but may be the point of origination for contaminants transported to other locations, shall be included in this section.

#### **8.12.6.7.ii Pathways**

A section shall describe potential migration pathways that could result in either acute or chronic exposures to contaminants. It shall include such pathways as utility trenches, paleochannels, surface exposures, surface drainages, stratigraphic units, fractures, structures, and other features. The migration pathways for each contaminant and each relevant medium should be tied to the potential receptors for each pathway. A discussion of contaminant characteristics relating to fate and transport of contaminants through each pathway shall also be included in this section.

#### **8.12.6.7.iii Receptors**

A section shall provide a listing and description of all anticipated potential receptors that could possibly be affected by the contamination present at the site. Potential receptors shall include human and ecological receptors, groundwater, and other features such as pathways that could divert or accelerate the transport of contamination to human receptors, ecological receptors, and groundwater.

### **8.12.6.8 Regulatory Criteria**

A section shall set forth the applicable cleanup standards, risk-based screening levels, and risk-based cleanup goals for each pertinent medium at the subject site. The appropriate cleanup levels for each site shall be included, if site-specific levels have been established at separate sites or units. A table summarizing the applicable cleanup standards or levels, or inclusion of applicable cleanup standards or levels in the summary data tables shall be included in the Tables Section of the document. The risk assessment shall be presented in a separate document or in an appendix to this report. If cleanup or screening levels calculated in a risk evaluation are employed, the risk evaluation document shall be referenced including pertinent page numbers for referenced information.

### **8.12.6.9 Identification of Corrective Measures Options**

A section shall identify and describe potential corrective measures for source, pathway, and receptor controls. Corrective measures options shall include the range of available options including, but not limited to, a no action alternative, institutional controls, engineering controls, in-situ and on-site remediation alternatives, complete removal, and any combination of alternatives that would potentially achieve cleanup goals.

### **8.12.6.10 Evaluation of Corrective Measures Options**

A section shall provide an evaluation of the corrective measures options identified in Permit Section 8.12.6.9. The evaluation shall be based on the applicability, technical feasibility, effectiveness, implementability, impacts to human health and the environment, and cost of each

option. A table summarizing the corrective measures alternatives and the criteria listed below shall be included in the Tables Section of the document. The general basis for evaluation of corrective measures options is defined below.

#### 8.12.6.10.i Applicability

Applicability addresses the overall suitability for the corrective action option for containment or remediation of the contaminants in the subject medium for protection of human health and the environment.

#### 8.12.6.10.ii Technical Practicability

Technical practicability describes the uncertainty in designing, constructing, and operating a specific remedial alternative. The description shall include an evaluation of historical applications of the remedial alternative including performance, reliability, and minimization of hazards.

#### 8.12.6.10.iii Effectiveness

Effectiveness assesses the ability of the corrective measure to mitigate the measured or potential impact of contamination in a medium under the current and projected site conditions. The assessment also shall include the anticipated duration for the technology to attain regulatory compliance. In general, all corrective measures described above will have the ability to mitigate the impacts of contamination at the site, but not all remedial options will be equally effective at achieving the desired cleanup goals to the degree and within the same time frame as other options. Each remedy shall be evaluated for both short-term and long-term effectiveness.

#### 8.12.6.10.iv Implementability

Implementability characterizes the degree of difficulty involved during the installation, construction, and operation of the corrective measure. Operation and maintenance of the alternative shall be addressed in this section.

#### 8.12.6.10.v Human Health and Ecological Protectiveness

This category evaluates the short-term (remedy installation-related) and long-term (remedy operation-related) hazards to human health and the environment of implementing the corrective measure. The assessment shall include whether the technology will create a hazard or increase existing hazards and the possible methods of hazard reduction.

#### 8.12.6.10.vi Cost

This section shall discuss the anticipated cost of implementing the corrective measure. The costs shall be divided into:

1. Capital costs associated with construction, installation, pilot testing, evaluation, permitting, and reporting of the effectiveness of the alternative; and
2. Continuing costs associated with operating, maintaining, monitoring, testing, and reporting on the use and effectiveness of the technology.

### **8.12.6.11 Selection of Preferred Corrective Measure**

The Permittees shall propose the preferred corrective measure(s) at the site and provide a justification for the selection in this section. The proposal shall be based upon the ability of the remedial alternative to:

1. Achieve cleanup objectives in a timely manner;
2. Protect human and ecological receptors;
3. Control or eliminate the sources of contamination;
4. Control migration of released contaminants; and
5. Manage remediation waste in accordance with State and Federal regulations.

The justification shall include the supporting rationale for the remedy selection, based on the factors listed in Permit Section 8.12.6.10 and a discussion of short- and long-term objectives for the site. The benefits and possible hazards of each potential corrective measure alternative shall be included in this section.

#### **8.12.6.12 Design Criteria to Meet Cleanup Objectives**

The Permittees shall present descriptions of the preliminary design for the selected corrective measures in this section. The description shall include appropriate preliminary plans and specifications to effectively illustrate the technology and the anticipated implementation of the remedial option at the subject area. The preliminary design shall include a discussion of the design life of the alternative and provide engineering calculations for proposed remediation systems.

#### **8.12.6.13 Schedule**

A section shall set forth a proposed schedule for completion of remedy-related activities such as bench tests, pilot tests, construction, installation, remedial excavation, cap construction, installation of monitoring points, and other remedial actions. The anticipated duration of corrective action operations and the schedule for conducting monitoring and sampling activities shall also be presented. In addition, this section shall provide a schedule for submittal of reports and data to the Department, including a schedule for submitting all status reports and preliminary data.

#### **8.12.6.14 Tables**

A section shall present the following summary tables, as appropriate:

1. A table summarizing regulatory criteria, background, and/or the applicable cleanup standards;
2. A table summarizing historical field survey location data;
3. Tables summarizing historical field screening and field parameter measurements of soil, rock, sediments, groundwater, surface water, and air quality data;
4. Tables summarizing historical soil, rock, or sediment laboratory analytical data. The summary tables shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data;
5. A table summarizing historical groundwater elevation and depth to groundwater data. The table shall include the monitoring well depths and the screened intervals in each well;



6. Tables summarizing historical groundwater laboratory analytical data. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data;
7. Tables summarizing historical surface water laboratory analytical data if applicable. The analytical data tables shall include the analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data;
8. Tables summarizing historical air sample screening and analytical data. The data tables shall include the screening instruments used, laboratory analytical methods, detection limits, and significant data quality exceptions that would influence interpretation of the data;
9. Tables summarizing historical pilot or other test data, if applicable, including units of measurement and types of instruments used to obtain measurements;
10. A table summarizing the corrective measures alternatives and evaluation criteria; and
11. A table presenting the schedule for installation, construction, implementation and reporting of selected corrective measures.

With prior approval of the Department, the Permittees may combine one or more of the tables. Data presented in the summary tables shall include information on dates of sample collection, analytical methods, detection limits, and significant data quality exceptions. The analytical data tables shall include only detected analytes and data quality exceptions that could potentially mask detections.

#### **8.12.6.15 Figures**

A section shall present the following figures for each site, as appropriate:

1. A vicinity map showing topography and the general location of the subject site relative to surrounding features or properties;
2. A unit site plan that presents pertinent site features and structures, underground utilities, well locations, and remediation system locations and details. Off-site well locations and other relevant features shall be included on the site plan if practical. Additional site plans may be required to present the locations of relevant off-site well locations, structures, and features;
3. Figures showing historical soil boring or excavation locations and sampling locations.
4. Figures presenting historical soil sample field screening and laboratory analytical data, if appropriate;
5. Figures showing all existing wells including vapor monitoring wells and piezometers. The figures shall present historical groundwater elevation data and indicate groundwater flow directions;
6. Figures presenting historical groundwater laboratory analytical data including past data, if applicable. The analytical data corresponding to each sampling location may be presented as individual concentrations, in table form on the figure or as an iso-concentration map;

7. Figures presenting historical surface water sample locations and analytical data including past data, if applicable. The laboratory analytical data corresponding to each sampling location may be presented as individual concentrations or in table form on the figure;
8. Figures presenting historical air sampling locations and presenting air quality data. The field screening or laboratory analytical data corresponding to each sampling location may be presented as individual concentrations, in table form on the figure or as an iso-concentration map;
9. Figures presenting historical pilot or other test locations and data, where applicable, including site plans or graphic data presentation;
10. Figures presenting geologic cross-sections based on outcrop and borehole data, if applicable;
11. Figures presenting the locations of existing and proposed remediation systems;
12. Figures presenting existing remedial system design and construction details; and
13. Figures presenting preliminary design and construction details for preferred corrective measures.

All figures must include an accurate bar scale and a north arrow. An explanation shall be provided on each figure for all abbreviations, symbols, acronyms, and qualifiers. All figures shall have a date.

#### **8.12.6.16 Appendices**

Each corrective measures evaluation shall include, as appropriate, as an appendix, the management plan for waste, including investigation derived waste, generated as a result of construction, installation, or operation of remedial systems or activities conducted. Each corrective measures evaluation shall include additional appendices presenting relevant additional data, such as pilot or other test or investigation data, remediation system design specifications, system performance data, or cost analyses as necessary.