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1:44 pm, Nov 16, 2009

Alameda County
Environmental Health

November 13, 2009

Mr. Mark Detterman
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502

**Re: Soil Vapor Testing and Additional Assessment Work Plan
Kerry & Associates – Palace Garage
14336 Washington Avenue
San Leandro, California
ACEH Case No. RO0000208
SFRWQCB LUFT Case No. 01-1133**

Dear Mr. Detterman,

On behalf of Kerry & Associates, Closure Solutions Inc. (Closure Solutions) has prepared this *Soil Vapor Testing and Additional Assessment Work Plan* (Work Plan) for the Palace Garage Site located at 14336 Washington Avenue, San Leandro, California (the Site, Figure 1). This Work Plan was completed as discussed in an e-mail to Ms. Kathleen Waldo dated October 16, 2009 (Attachment A) to identify data gaps that will need to be addressed prior to no further action status for the site.

1.0 SITE BACKGROUND

A 550-gallon gasoline underground storage tank (UST) was removed from the site in 1991. Subsequent investigations included the installation of 3 monitoring wells and the drilling of 15 borings. Based on data obtained from the wells and borings, impacted unsaturated-zone soil is confined to the area of the former dispenser pad and UST. The primary groundwater flow direction is toward the southwest.

In December 2002, Professional Service Industries, Inc. (PSI) conducted a soil and groundwater investigation to evaluate the lateral extent of petroleum hydrocarbons in the soil and groundwater at the site. Borings SB-16 and SB-17 were advanced to between 20 and 24 feet below ground surface (bgs). Boring SB-16 was converted into monitoring well MW-4. Concentration of total petroleum hydrocarbons as gasoline (TPHg) and gasoline related contaminants were detected only in soil from boring SB-17 and groundwater from wells MW-1 and MW-2. The locations of the monitoring wells and soil borings are presented in Figure 1.

Closure Solutions conducted a Sensitive Receptor Survey to identify all water supply wells and sensitive receptors within a 2,000-foot radius of the Site. The closest water supply wells are two industrial wells approximately 450 feet northwest (cross-gradient) of the Site. The closest domestic well is approximately 1,500 feet southeast (cross-gradient) of the Site. The closest down-gradient well is an irrigation well approximately 1,400 feet southwest of the Site. No surface water bodies were identified within a 2,000-foot radius of the Site. Results of the Sensitive Receptor Survey are presented in the *Sensitive Receptor Survey* report dated August 27, 2008.

Closure Solutions prepared and submitted a *Site Conceptual Model* (SCM) dated September 30, 2008 for the Site. The preparation of the SCM was requested by Alameda County Environmental Health (ACEH) in their letter dated September 2, 2008.

In an email dated June 12, 2009 Mr. Steve Plunkett with the ACEH approved the reduction of groundwater monitoring to a Semi-annual basis conducted in second and fourth quarters. Mr. Plunkett also approved the recommendation to eliminate the fuel oxygenates from the suite of laboratory analytes.

2.0 FIELD INVESTIGATION

The proposed scope of work consists of installing and sampling a total of three temporary soil vapor probes and completion of one downgradient boring for the collection of soil and groundwater samples. The proposed soil vapor probes are to be located near areas of contamination and within 10 feet of the buildings. The proposed soil boring is to be located between borings SB-16 and SB-17. The proposed soil vapor probe and soil boring locations are depicted on Figure 1.

2.1 Preliminary Field Activities

Prior to initiating field activities, Closure Solutions will obtain the necessary drilling permits, prepare a Site Health and Safety Plan (HASP) for the proposed work, and clear the Site for subsurface utilities. The utility clearance will include notifying Underground Service Alert (USA) of the pending work a minimum of 48 hours prior to initiating the field investigation, and securing the services of a private utility locating company to confirm the absence of underground utilities at each boring location.

A HASP will be prepared for use by personnel implementing the Work Plan. The HASP will address hazards associated with the proposed fieldwork. A copy of the HASP will be available on-Site during fieldwork. The subcontractor(s) performing field activities will be provided with a copy of the HASP prior to initiating work. A safety tailgate meeting will also be conducted daily to review the Site hazards and work scope.

2.2 Boring Procedures

Borings for soil vapor collection and downgradient delineation will be completed using a direct push technology such as GeoProbe[®]. As a further measure of protection for utilities that may not have been located during pre-field utility clearance activities each boring will be hand cleared. The soil borings for the temporary soil vapor probes will be hand-cleared to approximately 3 feet bgs. The soil boring location will be hand cleared for the first five feet. Following boring advancement and sampling activities, neat cement will be placed from the bottom of the boring to ground surface. Where a boring was advanced through pavement, it will be completed with concrete and dyed black as appropriate to approximately match the surrounding surface.

2.3 Soil Vapor Probe Installation

Closure Solutions personnel will supervise the completion of three temporary soil vapor probes (SV-1 through SV-3). Soil vapor samples will be collected at approximately 5 feet bgs. In addition to collecting soil vapor samples, Closure Solutions will collect soil samples from each borehole to evaluate physical parameters. Following the soil vapor sampling, the borehole will be grouted from the bottom of the borehole to grade with neat cement grout. The locations of SV-1 through SV-3 are illustrated on Figure 1. Construction design may be adjusted in the field based on lithology and current field conditions. A diagram of the proposed temporary soil vapor probes is presented in Attachment B.

2.4 Downgradient Boring Installation

Closure Solutions will supervise the advancement of one soil boring (SB-18). Soil samples will be collected for lithologic determination with a minimum of one soil sample collected at the approximate capillary fringe zone retained for laboratory analysis. The location, depth and number of borings, as well as sampling intervals, may be adjusted in the field based on lithology, field evidence of contamination, and the presence of surface obstructions or difficult drilling conditions.

Soil samples will be field screened for the presence of residual petroleum hydrocarbon vapor concentrations using a photo-ionization detector (PID) or flame-ionization detector (FID). Soil samples collected will be classified by Closure Solutions field personnel according to the Unified Soil Classification System (USCS) and examined using visual and manual methods for parameters including odor, staining, color, grain size, and moisture content.

Additionally, a groundwater sample will be collected from the proposed boring. Groundwater samples will be collected by placing a screened PVC casing in the boring and utilizing either a clean small diameter bailer or a peristaltic pump with disposable tubing to fill sample containers.

2.5 Soil Sample Handling and Analysis

Each soil sample collected for soil analysis will be covered at each end with TeflonTM sheeting, capped with plastic end caps and labeled. Soil samples collected from soil vapor probes for soil parameter analysis will be submitted under chain-of-custody protocol to a California State-certified analytical laboratory. One soil sample will be analyzed for the following parameters: density, organic carbon content (by the Walkee Black Method), soil moisture, effective permeability, porosity, and grain size distribution analysis. Soil and groundwater samples collected from the soil boring will be submitted under chain-of-custody protocol to a California State-certified analytical laboratory and analyzed for TPHg, benzene, toluene, ethyl-benzene and total xylenes (BTEX compounds) by EPA Method 8260B.

2.6 Soil Vapor Sampling Protocol

Soil vapor samples will be collected at least 20 minutes after probe installation from a depth of approximately 5 feet bgs. Soil vapor sampling will be conducted in accordance with Department of Toxic Substance and Control (DTSC) guidance included as Attachment C.

- Soil vapor samples will be collected at least seven days after any measurable precipitation event.
- Hydrated bentonite will be placed around the drill rod prior to sampling to inhibit surface air migration down the outer portion of the drill rod.
- Prior to sampling, Closure Solutions will perform a leak check by placing isopropyl alcohol on the sample line fittings and the top of the vapor probe tubing (where the tubing exits the boring).

- Three volumes of air will be purged from the sample tubing before collecting the vapor sample.
- Summa canisters with vacuum gauges will be used for VOC sample collection.
- A regulator will be used to collect the vapor samples at 100-200 milliliters/minute (ml/min) flow rate to inhibit partitioning or short-circuiting (~25-30 minutes for a 6 liter Summa canister or ~4-8 minutes for a 1 liter Summa canister, assuming 20 percent vacuum will be left in the canister).
- Per the guidance outlined in the Interstate Technology and Regulatory Council *Vapor Intrusion Pathway: A Practical Guideline* in Appendix D Section D.10, an additional outdoor air sample will be collected to characterize site-specific outdoor air background conditions. The outdoor air sample will be collected upwind and away from wind obstructions such as trees and buildings. The intake will be approximately 3 to 5 feet from ground surface and 5 to 15 feet away from the on-Site building.
- The samples will not be chilled (they will be discarded if condensation is observed in the sample tubing).

2.7 Soil Vapor Sample Analysis

The soil vapor samples will be transported under chain of custody to Air Toxics of Folsom, California. The samples will not be kept on ice. Samples will be analyzed by EPA Method TO-15 for BTEX compounds and by EPA Method TO-3 for TPHg. In addition, O₂, CO₂ and methane will be analyzed by ASTM-1946. The samples will also be analyzed for isopropyl alcohol by EPA Method TO-15 to ensure that leaks are not present in the tubing run during sampling.

2.8 Waste Disposal

Investigation derived waste (IDW) will be temporarily stored on-site in 55-gallon, DOT-approved 17H drums, pending characterization and disposal. The IDW will be characterized in accordance with waste disposal or recycling facility acceptance requirements. Closure Solutions will coordinate the transfer and disposal of the IDW at an approved facility with a California-licensed waste transporter.

3.0 SUMMARY REPORT

Upon completion of field activities and receipt of all laboratory analytical data, Closure Solutions will finalize and submit a summary report. The report will document the results of the investigation and include a risk assessment to predict and quantify exposure and to compute health risk associated with petroleum hydrocarbons remaining at the site. If warranted the report will provide recommendations for additional work or a recommendation for no further action.

3.1 Human Health Risk Assessment

A human health risk assessment (HHRA) will be completed using vapor and soil parameter data collected during the soil vapor sampling. The HHRA will begin with the identification of contaminants of potential concern (COPCs) based on their toxic or carcinogenic properties. An exposure assessment will be completed to determine which potential pathways of exposure are complete and merit further evaluation. For those exposure pathways that are complete, potential contaminant intakes or doses will be computed. The doses will then be coupled with published cancer potency (slope factors) and toxicity (reference doses/concentrations) parameters to quantify potential adverse health effects.

3.2 GeoTracker

In accordance with GeoTracker requirements, Closure Solutions will upload analytical reports, copies of bore logs and the final report related to this investigation.

4.0 PROPOSED SCHEDULE

Upon receiving written approval of this Work Plan, Closure Solutions will proceed with the proposed work. Closure Solutions will obtain all necessary permits to complete the proposed work. Closure Solutions anticipates submitting the report within 60 days of receipt of all laboratory analytical results from investigation activities.

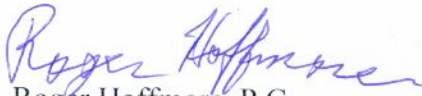
5.0 LIMITATIONS

This report is based on Site conditions, data, and other information available as of the date of the report, and the conclusions and recommendations herein are applicable only to the time frame in which the report was prepared. Background information used to prepare this report including, but not limited to, previous field measurements, analytical results, Site plans and other data have been furnished to Closure Solutions by Kerry & Associates and their previous consultants or as available on the GeoTracker website. Closure Solutions has relied on this information as furnished, and is neither responsible for nor has confirmed the accuracy of this information.

We appreciate the opportunity to submit this work plan and trust that this document meets with your approval. If you have any questions or concerns, feel free to contact Kathleen Waldo at (916) 760-7025 or kwaldo@closureolutions.com.

Sincerely,

Closure Solutions, Inc.

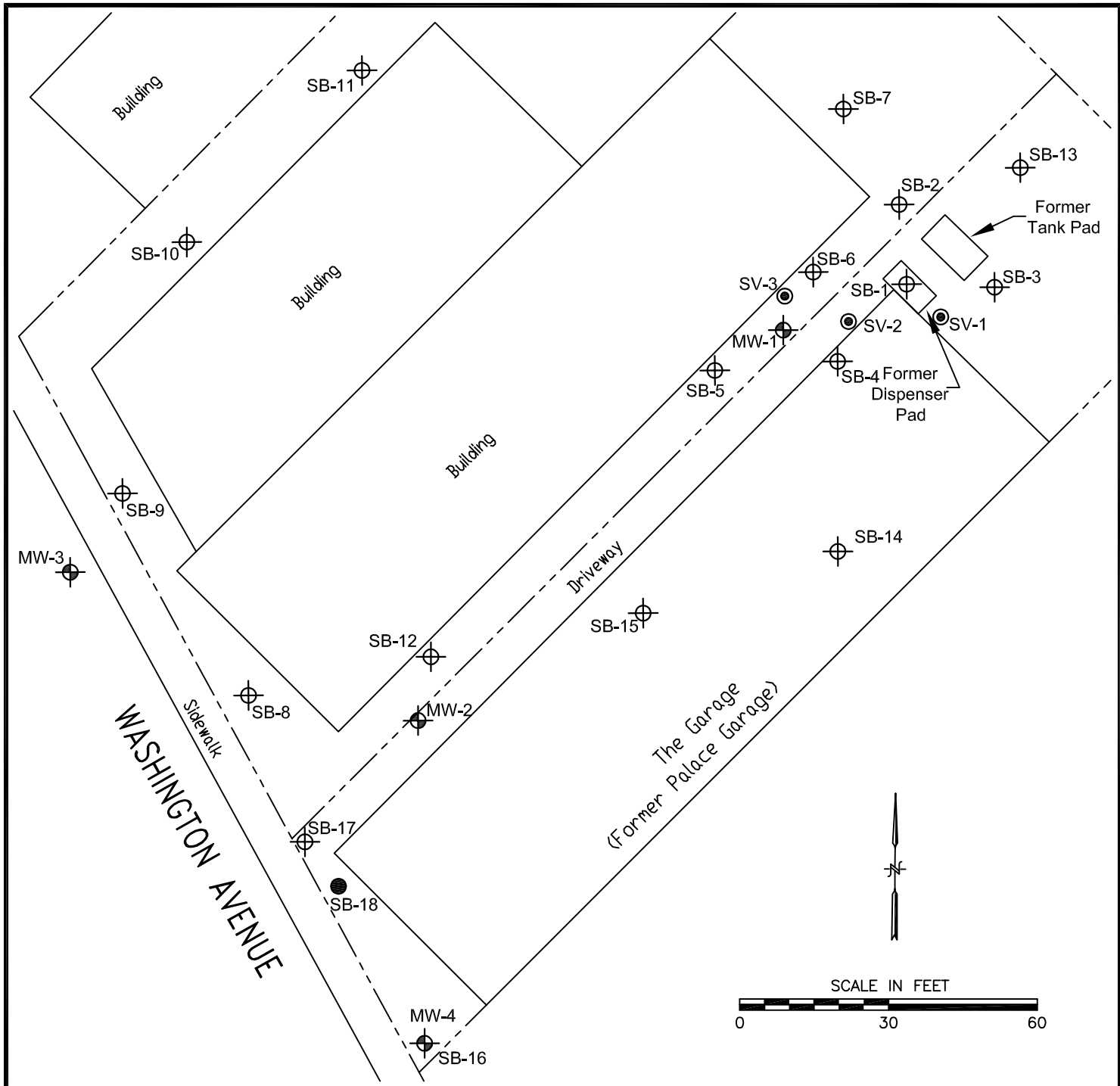

Roger Hoffmore, P.G.
Senior Geologist



Attachments:

Figure 1	Proposed Boring Location Map
Attachment A	Alameda County Environmental Health Correspondence
Attachment B	Temporary Soil Vapor Probe Construction Details
Attachment C	DTSC Guidance

cc: Mr. Jeff Kerry, Kerry & Associates



LEGEND:

- ⊕ GROUNDWATER MONITORING WELL
- ⊕ SOIL BORING
- PROPOSED SOIL VAPOR PROBE
- PROPOSED SOIL BORING

NOTES:

1. BASEMAP SOURCE: MORROW SURVEYING, 2/05/03

FIGURE 1

**PROPOSED BORING
LOCATION MAP**

PALACE GARAGE
14336 WASHINGTON AVENUE
SAN LEANDRO, CALIFORNIA



CLOSURE SOLUTIONS, INC.

1243 Oak Knoll Drive • Concord
California • 94521
Phone: (925) 429-5555 • Fax: (925) 459-5602

ATTACHMENT A

Alameda County Environmental Health Correspondence

From: Detterman, Mark, Env. Health <Mark.Detterman@acgov.org>

To: 'kwaldo@closuresolutions.com' <kwaldo@closuresolutions.com>

Cc:

Date: Friday, October 16, 2009 01:20 pm

Subject: RE: Palace Garage RO#208

Attachments:

Hi Kate,

It was good to talk to you yesterday; we made contact!

In general I think that covered most of the items, although I should note in bore SB-17 the soil sample was also collected what appears to be 3.5 ft below groundwater. While the soil analytical results were reasonably low and the PID response reasonably within the higher range of what was detected in the bore, the collection depth can induce problems with soil delineation. If additional delineation bores are installed downgradient it could be appropriate to mitigate potential downgradient soil delineation issues this induced.

In regards to SB-16, I also noticed that there are some really elevated PID responses (1,221 PID units; but with no odor; huh?) in soil that did not get sampled to confirm either a positive or negative detection. Don't know if it was in the workplan at the time, but it would have been appropriate to sample soil to rule it out (with luck).

Now for some caveats. These observations and the ones we spoke of yesterday were made based on my "Impediments to Closure" review all agencies are mandated to do by the state as a part of Resolution 2009-0042 (my site review is not yet posted). As part of that resolution all agencies need to review ALL sites before ANY letters of request can be issued (unless a health risk [human or environment] or imminent development exist such as stimulus fund money is in jeopardy). All of which is designed to save the USTCF money until that time. As mentioned the resolution gives us to next August, but we are attempting to complete by January-ish, and in my case as a new case worker with a full load of new sites, more likely longer. So to the point, this is not a directive letter or letter of request, but a technical discussion of a site. If a work plan is submitted, once I can start reviewing sites again and issuing letters, and provided the work plan is approved and / or modified, the work would become eligible for reimbursement as a request from the LOP. I also noticed after we hung up that unfortunately this site has yet an additional impediment for reimbursement currently, a suspended LOC.

It definitely makes the current work environment difficult....

Regardless, it was good to talk to you yesterday.

Best,

Mark Detterman

Hazardous Materials Specialist, PG, CEG

Alameda County Environmental Health

1131 Harbor Bay Parkway

Alameda, CA 94502

Direct: 510.567.6876

Fax: 510.337.9335

Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: kwaldo@closuresolutions.com [<mailto:kwaldo@closuresolutions.com>]

Sent: Friday, October 16, 2009 9:56 AM

To: Detterman, Mark, Env. Health

Subject: Palace Garage RO#208

Hay Mark,

Thanks for taking the time to chat with me about the Palace Garage site yesterday. As I mentioned, our client is very interested in moving this case toward closure. We talked about the need for a vapor survey and that since there were no groundwater samples collected from SB-17 the downgradient extent of impacted groundwater has not been identified. We also talked about how the survey info has not been uploaded to GeoTracker. The last couple of questions that you had were in regard to the use of the neighboring buildings and the results of the utility survey and how it may relate to the plume shape in the northern portion of the property.

In order to address these data gaps and get this site on the road to closure, Closure Solutions will prepare a work plan to address these issues. The subsequent report will include geologic cross-sections and a recommendation for mitigation or site closure as warranted. Does this sound reasonable and appropriate to move this site toward closure?

Thanks,

Kate

Kathleen Waldo
Project Engineer

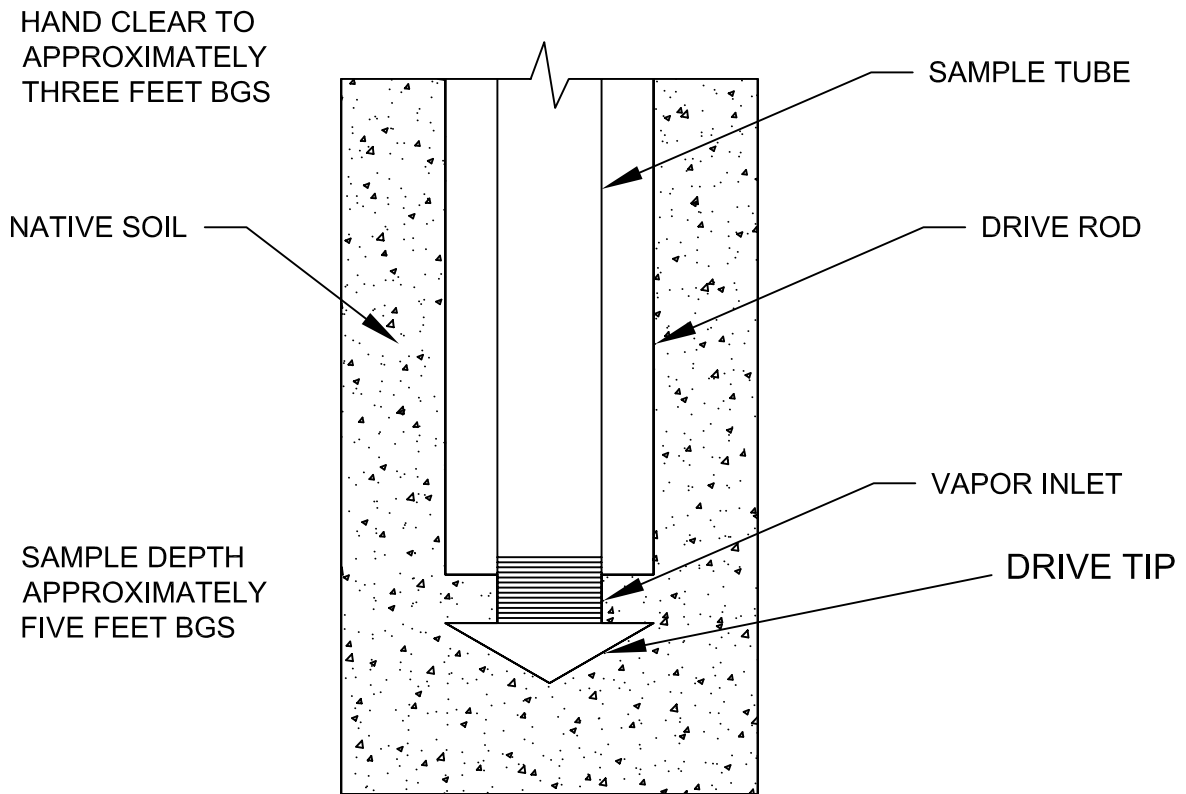
Closure Solutions, Inc.
1243 Oak Knoll Drive
Concord, California 94521
Direct: (916) 760-7025
Cell: (916) 213-2058

ATTACHMENT B

Temporary Soil Vapor Probe Construction Details

TEMPORARY GAS PROBE METHOD

TO SURFACE



NOT TO SCALE

Temporary Soil Vapor
Probe Construction Detail



CLOSURE SOLUTIONS, INC.

1243 Oak Knoll Drive • Concord
California • 94521

Phone: (925) 429-5555 • Fax: (925) 459-5602

ATTACHMENT C
DTSC Guidance



Gray Davis, Governor
Winston H. Hickox, Agency Secretary
California Environmental Protection Agency



Department of Toxic Substances Control

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201
Phone (818) 551-2800
FAX (818) 551-2832
www.dtsc.ca.gov

California Regional Water Quality Control Board
Los Angeles Region

320 W. 4th Street, Suite 200
Los Angeles, California 90013
Phone (213) 576-6600
FAX (213) 576-6640
www.swrcb.ca.gov/rwqcb4

January 28, 2003

To: Interested Parties

ADVISORY – ACTIVE SOIL GAS INVESTIGATIONS

In a coordinated effort, the Department of Toxic Substances Control (DTSC) and the California Regional Water Quality Control Board – Los Angeles Region (LARWQCB) have jointly developed the “Advisory – Active Soil Gas Investigations” (see the attached). This document is to ensure that consistent methodologies are applied during active soil gas investigations to produce high quality data for regulatory decision-making. The document has been reviewed by other government organizations and by the soil gas consulting community. Their comments have been considered and, where appropriate, incorporated in the document. This is an on-going effort to streamline the characterization of gas phase contaminant sites. As additional knowledge and experience are obtained, this Advisory may be modified as appropriate.

This document is issued by DTSC and LARWQCB as an Advisory subject to review and revision as necessary. The information in this Advisory should not be considered as regulations. Mention of trade names or commercial products does not constitute the Agency’s endorsement or recommendation.

If you have any questions regarding this document, please contact the joint-agency project coordinator Mr. Joe Hwong, of DTSC, at (714) 484-5406.

Sincerely,

Edwin F. Lowry
Director
Department of Toxic Substances Control

Dennis A. Dickerson
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region

Enclosure

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

bcc: Dr. Yue Rong – LARWQCB
Dr. Rebecca Chou – LARWQCB
Ms. Dorothy Rice – DTSC/HQ
Mr. Hamid Saebfar – DTSC/Glendale
Ms. Sharon Fair – DTSC/Glendale
Mr. Joe Hwong – DTSC/Cypress

ADVISORY – ACTIVE SOIL GAS INVESTIGATIONS

As a coordinated effort, this document is issued by the California Regional Water Quality Control Board – Los Angeles Region (LARWQCB) and Department of Toxic Substances Control (DTSC) as an Advisory subject to review and revision as necessary. Mention of trade names or commercial products does not constitute the Agency's endorsement or recommendation. The information in this Advisory should not be considered as regulations. In this Advisory, "Agency" should mean LARWQCB and/or DTSC.

1.0 INTRODUCTION

Active soil gas investigations are useful to obtain vapor phase data at sites potentially affected by volatile organic compounds (VOCs), including chlorinated and aromatic hydrocarbons. Active soil gas investigations may also be used to investigate sites potentially affected by methane and hydrogen sulfide, and to measure fixed and biogenic gasses (e.g., oxygen, carbon dioxide, or carbon monoxide). Among other things, the data can be used to identify the source and determine the spatial distribution of VOC contamination at a site, or to estimate indoor air concentrations for risk assessment purposes.

For site characterization, the Agency encourages both soil gas and soil matrix sampling. Typically, soil gas data are more representative of actual site conditions in coarse-grained soil formations while soil matrix data are more representative of actual site conditions in fine-grained soil formations. For evaluating the risk associated with vapor intrusion to indoor air, soil gas data are the preferred contaminant data set, where practicable. Flux chamber and passive sampling methods are not discussed in this Advisory. Any sites where such sampling methods are necessary will be addressed separately.

On February 25, 1997, LARWQCB re-issued the "Interim Guidance for Active Soil Gas Investigation" (ASGI) as guidance for investigating sites with potential VOC contamination. Unless otherwise noted in this Advisory, the active soil gas investigation should be performed in accordance with the most current ASGI.

2.0 SUPPLEMENTAL RECOMMENDATIONS

The following sections supplement the ASGI in an effort to ensure that consistent methodologies are applied during soil gas investigations to produce reliable and defensible data of high quality. All sampling probe installation, sampling, and analytical procedures, whether or not discussed below, are subject to Agency review and approval.

- 2.1 Project Management
- 2.2 Soil Gas Sampling Probe Installation
- 2.3 Purge Volume Test
- 2.4 Leak Test
- 2.5 Purge/Sample Flow Rate
- 2.6 Soil Gas Sampling
- 2.7 Analysis of Soil Gas Samples

2.1 Project Management

2.1.1 Workplan: An appropriate workplan should be prepared and submitted to the Agency for review and approval at least 30 days prior to its implementation. Any variations or deviations from this Advisory should be specified in the workplan. The soil gas workplan can either be incorporated as part of a comprehensive site investigation workplan or as a stand-alone document, depending on site-specific circumstances.

2.1.2 Field Activities

- A. The Agency should be notified 10 working days prior to implementation of field activities. All necessary permits and utility clearance(s) should be obtained prior to conducting any investigations described in this Advisory.
- B. All engineering or geologic work (e.g., logging continuous soil cores, soil description) should be performed or supervised by a California Registered Professional in accordance with the Business and Professions Code, Chapters 7 and 12.5, and the California Code of Regulations, Title 16, Chapters 5 and 29.

In addition, for proposed school sites, all work performed should be under the direction and supervision of a project coordinator experienced in soil gas investigations [e.g., an Environmental Assessor as defined in Education Code Section 17210(b)].

- C. Evaluation of raw data by Agency staff may occur either in the field or in the office.
 - 1. Hard copies of the complete raw laboratory data, including handwritten data and field notes, should be provided to the Agency staff upon request.
 - 2. Adjustments or modifications to the sampling program may be required by Agency staff to accommodate changes mandated by evaluation of the data set or unforeseen site conditions.
- D. Investigation derived wastes (IDWs) should be managed as hazardous waste until proven otherwise or until specifically approved by the Agency as being non-hazardous waste. IDWs should be handled and disposed in accordance with federal, state and local requirements.

E. Field Variations

1. To expedite the completion of field activities and avoid potential project delays, contingencies should be proposed and included in the project workplan (e.g., soil matrix samples will also be collected if clayey soils [as defined in the Unified Soil Classification System (USCS)] are encountered during the proposed soil gas investigation).
2. The Agency field staff should be informed of any problems, unforeseen site conditions, or deviations from the approved workplan. When it becomes necessary to implement modifications to the approved workplan, the Agency should be notified and a verbal approval should be obtained before implementing changes.

F. Soil Matrix Sampling Requirements: Companion soil matrix sampling may be conducted concurrently with a soil gas investigation (in accordance with the ASGI, Section 5.0), except where extremely coarse-grained soils (as defined in USCS) are encountered or when specifically excluded by the Agency.

2.1.3 Soil Gas Investigation Reports: A soil gas investigation report including a discussion of field operations, deviations from the approved workplan, data inconsistencies, and other significant operational details should be prepared. The report may either be a stand-alone document in a format recommended by the Agency or be included within a site-specific assessment report. At a minimum, the report should contain the following:

- A. Site plan map and probe location map at an appropriate scale as specified in the workplan (e.g., scale: one inch = 40 feet);
- B. Final soil gas iso-concentration maps for contaminants of concern at the same scale as the site plan map;
- C. Summary tables for analytical data, in micrograms per liter ($\mu\text{g/L}$), in accordance with the ASGI;
- D. Legible copies of field and laboratory notes or logs;
- E. All analytical results and Quality Assurance/Quality Control (QA/QC) information including tables and explanations of procedures, results, corrective actions and effect on the data, in the format specified by the Agency; and
- F. Upon request, all raw data including chromatograms and calibration data should be submitted to the Agency.

2.2 Soil Gas Sampling Probe Installation

2.2.1 Lithology: Site soil or lithologic information should be used to select appropriate locations and depths for soil gas probes. If on-site lithologic information is not available prior to conducting the soil gas investigation, at least one (1) continuously cored boring to the proposed greatest depth of the soil gas investigation should be installed at the first sampling location, unless specifically waived or deferred by Agency. Depending on site conditions, additional continuously cored borings may be necessary.

A. Lithologic logs should be prepared for all borings (e.g., continuously cored borings, soil matrix sampling, geotechnical sampling, etc.). Note: This does not apply to direct-push soil gas probe installations.

B. Information gathered from the continuously cored borings may include soil physical parameters, geotechnical data and contaminant data.

C. If low-flow or no-flow conditions (e.g., fine-grained soil, clay, soil with vacuum readings that exceed approximately 10 inches of mercury or 136 inches of water) are encountered, soil matrix sampling using EPA Method 5035A should be conducted in these specific areas. Also see Section 4 of LARWQCB's "General Laboratory Testing Requirements for Petroleum Hydrocarbon Impacted Sites" on use of EPA Method 5035A.

D. If the bottom five (5) feet of a continuously cored boring is composed of clay or soil with a vacuum exceeding approximately 10 inches of mercury or 136 inches of water, the continuously cored boring should be extended an additional five (5) feet to identify permeable zones. If the extended boring is also composed entirely of clay, the boring may be terminated. Special consideration should always be given to advancing borings and ensuring that a contaminant pathway is not being created through a low permeability zone.

2.2.2 Sample Spacing: A scaled site plan depicting potential or known areas of concern (e.g., existing or former sumps, trenches, drains, sewer lines, clarifiers, septic systems, piping, underground storage tanks [USTs], chemical or waste management units) should be provided in the project workplan. Sample spacing should be in accordance with the most current ASGI and may be modified based on site-specific conditions with Agency approval. To optimize detecting and delineating VOCs, the grid spacing should be modified to include biased sampling locations.

- 2.2.3 **Sample Depth:** Sample depths should be chosen to minimize the effects of changes in barometric pressure, temperature, or breakthrough of ambient air from the surface; and to ensure that representative samples are collected. Consideration should be given to the types of chemicals of concern and the lithology encountered.
- A. At each sample location, soil gas probes should be installed at a minimum of one sample depth, generally at five (5) feet below ground surface (bgs), in accordance with the most current ASGI.
 - B. Samples should be collected near lithologic interfaces or based on field instrument readings (e.g., Flame Ionization Detector [FID], Photo Ionization Detector [PID]) from soil cuttings and/or cores to determine the location of maximum analyte concentrations at the top or bottom of the interface depending upon the analyte.
 - C. Multi-depth sampling is appropriate for any of the following locations:
 - 1. Sites identified with subsurface structures (e.g., USTs, sumps, clarifiers, waste or chemical management units), subsurface sources (e.g., oil fields, artificial fill, buried animal waste), changes in lithology, and/or contaminated groundwater. Soil gas probes should be emplaced below the base of any subsurface structures, sources or backfilled materials in the vadose zone. Collection of deeper samples should be done in consultation with Agency staff;
 - 2. Areas with significantly elevated VOC concentrations detected during shallow or previous vapor sampling;
 - 3. Areas where elevated field instrument readings are encountered from soil matrix cuttings, cores or samples; or
 - 4. In the annular space of groundwater monitoring wells during construction, where an assessment of the vertical extent of soil gas contamination is necessary.
 - D. If no lithologic change or contamination is observed, default sampling depths may be selected for multi-depth sampling. For example, soil gas samples may be collected at 5, 15, 25, 40 feet bgs, etc., until either the groundwater is encountered or VOCs are not detected, whichever comes first.
 - 1. Additional samples may be necessary based on site conditions.
 - 2. For Preliminary Endangerment Assessments: When 40 feet bgs is reached, collection of deeper samples may be waived.

However, assessment and/or characterization of the deeper vadose zone may be required in the future to protect groundwater resources.

2.2.4 Sampling Tubes: Sampling tubes should be of a small diameter (1/8 to 1/4 inch) and made of material (e.g., nylon, polyethylene, copper or stainless steel) which will not react or interact with site contaminants. For example, metal tubes should not be used for collection of hydrogen sulfide samples.

- A. Clean, dry tubing should be utilized at all times. If moisture, water, or an unknown material is present in the probe prior to insertion, the tubing should be decontaminated or replaced.
- B. After use at each location:
 - 1. Non-reusable (e.g., nylon or polyethylene) sampling tubes should be discarded; or
 - 2. Reusable sampling tubes should be properly decontaminated as specified in Section 2.2.7.
- C. A drawing of the proposed probe tip design and construction should be included in the project workplan.

2.2.5 Soil Gas Probe Emplacement Methods

- A. Permanent or Semi-permanent Soil Gas Probe Methods:
Permanent or semi-permanent soil gas probes may be installed, using a variety of drilling methods. Please note that the mud rotary drilling method is not acceptable for soil gas probe emplacement. Other drilling methods such as air rotary and roto sonic can adversely affect soil gas data during and after drilling and will require extensive equilibration times. Therefore, they are not recommended. Other soil gas probe designs and construction (e.g., soil gas wells or nested wells) may be appropriate and should be discussed with Agency staff prior to emplacement. When additional sampling is not anticipated per consultation with the Agency, such probes may be properly removed or decommissioned after completion of the soil gas investigation.
 - 1. The probe tip should be emplaced midway within a minimum of one (1) foot of sand pack. The sand pack should be appropriately sized (e.g., no smaller than the adjacent formation) and installed to minimize disruption of airflow to the sampling tip. See Figure 1 for more information.
 - 2. At least one (1) foot of dry granular bentonite should be emplaced on top of each sand pack to preclude the infiltration

of hydrated bentonite grout. The borehole should be grouted to the surface with hydrated bentonite. With respect to deep probe construction with multiple probe depths, the borehole should be grouted between probes. One (1) foot of dry granular bentonite should be emplaced between the filter pack and the grout at each probe location. See Figure 2 for more information.

3. The use of a downhole probe support may be required for deep probe construction (e.g., 40 feet bgs for direct push probes).
 - a. Such probe support may be constructed from a one-inch diameter bentonite/cement grouted PVC pipe or other solid rod, or equivalent, allowing probes to be positioned at measured intervals.
 - b. The support should be properly sealed or solid (internally or externally) to avoid possible cross-contamination or ambient air intrusion.
 - c. The probes should be properly attached to the exterior of the support prior to placement downhole.
 - d. Alternative probe support designs should be described in the project workplan. If probe support will not be used for deep probes, justification should be included in the project workplan.
4. Tubing should be properly marked at the surface to identify the probe location and depth.
5. As-built diagrams for probes or wells should be submitted with the soil gas investigation report detailing the well identification and corresponding probe depths. A typical probe construction diagram may be submitted for probes with common design and installation.
6. Unless soil gas probes are removed or decommissioned, probes should be properly secured, capped and completed to prevent infiltration of water or ambient air into the subsurface and to prevent accidental damage or vandalism. For surface completions, the following components may be installed:
 - a. Gas-tight valve or fitting for capping the sampling tube;
 - b. Utility vault or meter box with ventilation holes and lock;
 - c. Surface seal; and
 - d. Guard posts.

B. Temporary Soil Gas Probe Emplacement Method: In general, the drive rod is driven to a predetermined depth and then pulled back to expose the inlets of the soil gas probe. After sample collection, both the drive rod and tubing are removed.

1. During installation of the probe, hydrated bentonite should be used to seal around the drive rod at ground surface to prevent ambient air intrusion from occurring.
2. The inner soil gas pathway from probe tip to the surface should be continuously sealed (e.g., a sampling tube attached to a screw adapter fitted with an o-ring and connected to the probe tip) to prevent infiltration.

2.2.6 Equilibration Time: During probe emplacement, subsurface conditions are disturbed. To allow for subsurface conditions to equilibrate, the following equilibration times are recommended:

- A. For probes installed with the direct push method where the drive rod remains in the ground, purge volume test, leak test, and soil gas sampling should not be conducted for at least 20 minutes following probe installation.
- B. For probes installed with the direct push method where the drive rod does not remain in the ground, purge volume test, leak test, and soil gas sampling should not be conducted for at least 30 minutes following probe installation.
- C. For probes installed with hollow stem drilling methods, purge volume test, leak test, and soil gas sampling should not be conducted for at least 48 hours (depending on site lithologic or drilling conditions) after the soil gas probe installation.
- D. Probe installation time should be recorded in the field log book.

2.2.7 Decontamination: After each use, drive rods and other reusable components should be properly decontaminated to prevent cross contamination. These methods include:

- A. 3-stage wash and rinse (e.g., wash equipment with a non-phosphate detergent, rinse with tap water, and finally rinse with distilled water); and/or
- B. Steam cleaning process.

2.3 Purge Volume Test

To ensure stagnant or ambient air is removed from the sampling system and to assure samples collected are representative of subsurface conditions, a

purge volume versus contaminant concentration test should be conducted as the first soil gas sampling activity at the selected purge test point. The purge volume test is conducted by collecting and analyzing a sample for target compounds after the removal of appropriate purge volumes.

2.3.1 Purge Test Locations: The purge test location should be selected as near as possible to the anticipated or confirmed contaminant source, and in an area where soil gas concentrations are expected to be greatest based on lithology (e.g., coarse-grained sediments). The first purge test location should be selected through the workplan approval process or as a field decision in conjunction with Agency staff.

2.3.2 Purge Volume: The purge volume or “dead space volume” can be estimated based on a summation of the volume of the sample container (e.g., glass bulbs), internal volume of tubing used, and annular space around the probe tip. Summa™ canisters, syringe, and Tedlar™ bags are not included in the dead space volume calculation. The Agency recommends step purge tests of one (1), three (3), and seven (7) purge volumes be conducted as a means to determine the purge volume to be applied at all sampling points.

- A. The appropriate purge volume should be selected based on the highest concentration for the compound(s) of concern detected during the step purge tests. The purge volume should be optimized for the compound(s) of greatest concern in accordance with Section 2.2 of the ASGI.
- B. If VOCs are not detected in any of the step purge tests, a default of three (3) purge volumes should be extracted prior to sampling.
- C. The step purge tests and purging should be conducted at the same rate soil gas is to be sampled (see Section 2.5).
- D. The purge test data (e.g., calculated purge volume, rate and duration of each purge step) should be included in the report to support the purge volume selection.

2.3.3 Additional Purge Volume Test

- A. Additional purge volume tests should be performed to ensure appropriate purge volumes are extracted if:
 - 1. Widely variable or different site soils are encountered; or
 - 2. The default purge volume is used and a VOC is newly detected.

- B. If a new purge volume is selected after additional step purge tests are conducted, the soil gas investigation should be continued as follows:
1. In areas of the same or similar lithologic conditions:
 - a. Re-sample 20 percent of the previously completed probes. This re-sampling requirement may be reduced or waived in consultation with Agency staff, depending on site conditions. If re-sampling indicates higher detections (e.g., more than 50 percent difference in samples detected at greater than or equal to 10 µg/L), all other previous probes should be re-sampled using the new purge volume.
 - b. Continue the soil gas investigation with the newly selected purge volume in the remaining areas.
 2. In areas of different lithologic conditions: Continue the soil gas investigation with the newly selected purge volume in the remaining areas.

2.4 Leak Test

Leakage during soil gas sampling may dilute samples with ambient air and produce results that underestimate actual site concentrations or contaminate the sample with external contaminants. Leak tests should be conducted to determine whether leakage is present (e.g., the leak check compound is detected and confirmed in the test sample after its application).

2.4.1 Leak tests should be conducted at every soil gas probe.

2.4.2 Leak Check Compounds: Tracer compounds, such as pentane, isopropanol, isobutene, propane, and butane, may be used as leak check compounds, if a detection limit (DL) of 10 µg/L or less can be achieved. These compounds may be contained in common products such as shaving cream.

2.4.3 A leak check compound should be placed at any location where ambient air could enter the sampling system or where cross contamination may occur, immediately before sampling. Locations of potential ambient air intrusion include:

- A. Sample system connections;
- B. Surface bentonite seals (e.g., around rods and tubing); or
- C. Top of the Temporary Soil Gas Probe (see Section 2.2.5.B).

- 2.4.4 The leak test should include an analysis of the leak check compound. If a leak check compound is detected in the sample, the following actions should be followed:
- A. The cause of the leak should be evaluated, determined and corrected through confirmation sampling;
 - B. If the leak check compound is suspected or detected as a site-specific contaminant, a new leak check compound should be used;
 - C. If leakage is confirmed and the problem can not be corrected, the soil gas probe should be properly decommissioned;
 - D. A replacement probe should be installed at least five (5) feet from the original probe decommissioned due to confirmed leakage, or consult with Agency staff; and
 - E. The leak check compound concentration detected in the soil gas sample should be included and discussed in the report.

2.5 Purge/Sample Flow Rate

Sampling and purging flow rates should not enhance compound partitioning during soil gas sampling. Samples should not be collected if field conditions as specified in Section 2.6.4 exist.

- 2.5.1 The purging or sampling flow rate should be attainable in the lithology adjacent to the soil gas probe.
- A. To evaluate lithologic conditions adjacent to the soil gas probe (e.g., where no-flow or low-flow conditions), a vacuum gauge or similar device should be used between the soil gas sample tubing and the soil gas extraction devices (e.g., vacuum pump, Summa™ canister).
 - B. Gas tight syringes may also be used to qualitatively determine if a high vacuum soil condition (e.g., suction is felt while the plunger is being withdrawn) is present.
- 2.5.2 The Agency recommends purging or sampling at rates between 100 to 200 milliliters per minute (ml/min) to limit stripping, prevent ambient air from diluting the soil gas samples, and to reduce the variability of purging rates. The low flow purge rate increases the likelihood that representative samples may be collected. The purge/sample rate may be modified based on conditions encountered in individual soil gas probes. These modified rates should be documented in the soil gas report.

2.6 Soil Gas Sampling

After the soil gas probe is adequately purged, samples should be collected by appropriate methodologies.

2.6.1 Sample Container: Samples should be collected in gas-tight, opaque/dark containers (e.g., syringes, glass bulbs wrapped in aluminum foil, Summa™ canisters), so that light-sensitive or halogenated VOCs (e.g., vinyl chloride) will not degrade.

- A. If a syringe is used, it should be leak-checked before each use by closing the exit valve and attempting to force ambient air through the needle.
- B. If syringe samples are analyzed within five (5) minutes of collection, aluminum foil wrapping may not be necessary.
- C. EPA Method TO-14A, TO-15, or an equivalent air analysis method, requires samples be collected in Summa™ canisters.
- D. If a Summa™ canister is used, a flow regulator should be placed between the probe and the Summa™ canister to ensure the Summa™ canister is filled at the flow rate as specified in Section 2.5.2.
- E. Tedlar™ bags should not be used to collect VOC samples.
- F. Specific requirements for methane and hydrogen sulfide sample containers are specified in Section 2.7.9.

2.6.2 Sample Collection

- A. Vacuum Pump: When a vacuum pump is used, samples should be collected on the intake side of the vacuum pump to prevent potential contamination from the pump. Vacuum readings or qualitative evidence of a vacuum should be recorded on field data sheets for each sample.
- B. Shallow Samples: Care needs to be observed when collecting shallow soil gas samples to avoid sample breakthrough from the surface. Extensive purging or use of large volume sample containers (e.g., Summa™ canisters) should be avoided for collection of near-surface samples [e.g., shallower than five (5) feet bgs].

2.6.3 Sample Container Cleanliness and Decontamination

- A. Prior to its first use at a site, each sample container should be assured clean by the analytical laboratory as follows:
 - 1. New containers should be determined to be free of contaminants (e.g., lubricants) by either the supplier or the analytical laboratory; and
 - 2. Reused/recycled containers: Method blank(s), as specified in Section 2.7.1.A, should be used to verify sample container cleanliness.
- B. After each use, reusable sample containers should be properly decontaminated.
 - 1. Glass syringes or bulbs should be disassembled and baked at 240° C for a minimum of 15 minutes or at 120° C for a minimum of 30 minutes, or be decontaminated by an equivalent method.
 - 2. Summa™ canisters should be properly decontaminated as specified by appropriate EPA analytical methods.
 - 3. During sampling activities using reused/recycled sampling containers (e.g., glass syringes, glass bulbs), at a minimum one (1) decontaminated sample container per 20 samples or per every 12 hours, whichever is more often, should be used as a method blank (as specified in Section 2.7.1.A) to verify and evaluate the effectiveness of decontamination procedures.
- C. Plastic syringes should be used only once and then properly discarded.

2.6.4 Field Conditions: Field conditions, such as rainfall, irrigation, fine-grained sediments, or drilling conditions may affect the ability to collect soil gas samples.

- A. Wet Conditions: If no-flow or low-flow conditions are caused by wet soils, the soil gas sampling should cease. In addition, the Agency recommends that the soil gas sampling should not be conducted during or immediately after a significant rain event (e.g., 1/2 inch or greater) or onsite watering.
- B. If low flow conditions are determined to be from a specific lithology, a new probe should be installed at a greater depth or a new lateral location should be selected after evaluation of the site lithologic logs (See Section 2.2.1) or in consultation with Agency staff.

- C. If moisture or unknown material is observed in the glass bulb or syringe, soil gas sampling should cease until the cause of the problem is determined and corrected.
- D. If refusal occurs during drilling, soil gas samples should be collected as follows or in consultation with Agency staff.
 - 1. For sample depths less than five feet, collect a soil gas sample following the precautions outlined in Section 2.6.2.B.
 - 2. For sample depths greater than five feet, collect a soil gas sample at the depth of refusal.
 - 3. A replacement probe should be installed within five (5) feet laterally from the original probe decommissioned due to refusal. If refusal still occurs after three tries, the sampling location may be abandoned.

2.6.5 Chain of Custody Records: A chain of custody form should be completed to maintain the custodial integrity of a sample. Probe installation times and sample collection times should be included in the soil gas report.

2.7 Analysis of Soil Gas Samples

2.7.1 Quality Assurance/Quality Control (QA/QC): The soil gas analytical laboratory should comply with the project Quality Assurance Project Plan (QAPP) and follow the QA/QC requirements of the most current ASGI and the employed EPA Method. If there is any inconsistency, the most restrictive and specific requirements should prevail. The analytical data should be consistent with the Data Quality Objectives (DQOs) established for the project. The Agency staff may inspect the field and/or laboratory QA/QC procedures. Copies of the QA/QC plan and laboratory calibration data should be presented to the Agency field staff upon request.

Field QC samples should be collected, stored, transported and analyzed in a manner consistent with site samples. The following QC samples should be collected to support the sampling activity:

A. Sample Blanks

- 1. Method Blanks: Method blanks should be used to verify the effectiveness of decontamination procedures as specified in Section 2.6.3.B.3 and to detect any possible interference from ambient air.
- 2. Trip Blanks for Off-site Shipments: Whenever VOC samples are shipped offsite for analysis, a minimum of one (1) trip blank

per day should be collected and analyzed for the target compounds. Trip blanks, consisting of laboratory grade ultra pure air, are prepared to evaluate if the shipping and handling procedures are introducing contaminants into the samples, and if cross contamination in the form of VOC migration has occurred between the collected VOC samples. Trip blank containers and media should be the same as site samples.

- B. Duplicate Samples: At least one (1) duplicate sample per laboratory per day should be field duplicate(s). Duplicate samples should be collected from areas of concern.
 - 1. Duplicate samples should be collected in separate sample containers, at the same location and depth.
 - 2. Duplicate samples should be collected immediately after the original sample.
 - C. Laboratory Control Samples and Dilution Procedure Duplicates: Laboratory Control Samples (LCS) and Dilution Procedure Duplicates (DPD) should be done in accordance with the most recent ASGI (Sections 3.5.0 and 3.12.4, respectively).
 - D. Split Samples: The Agency staff may request that split samples be collected and analyzed by a separate laboratory.
- 2.7.2 Laboratory Certification: Although the California Department of Health Services, Environmental Laboratory Accreditation Program (ELAP) does not currently require certification for soil gas analytical laboratories, the Agency recommends laboratories utilizing EPA Methods 8260B, 8021B, and 8015B for analyses of soil gas samples obtain ELAP certifications for such EPA analytical methods accordingly. The Agency or DTSC's Hazardous Materials Laboratory (HML) staff may inspect the laboratory.
- 2.7.3 Detection Limits for Target Compounds: Analytical equipment calibration should be in accordance with the most current ASGI. Consideration and determination of appropriate DLs should be based on the DQOs of the investigation.
- A. The DL for leak check compounds should be 10 µg/L or less (see Section 2.4.2). The DL for oxygen (O₂) and carbon dioxide (CO₂) should be one (1) percent or less. The DLs for methane and hydrogen sulfide are specified in Section 2.7.9.
 - B. If the investigation is being conducted to delineate the extent of contamination, a DL of 1 µg/L is appropriate for all targeted VOCs.

- C. If the soil gas data are to be used to support risk assessment activities, a DL of 1 µg/L may be appropriate for the initial screening when evaluating all targeted VOCs. If the data are non-detect for all targeted VOCs, additional sampling with lower DLs is not required. If VOCs are detected, additional sampling, using a DL of 0.1 µg/L, may be required to confirm the non-detection of carcinogenic VOCs [see the Toxicity Criteria Database of the California Environmental Protection Agency, Office of Environmental Health Hazard (OEHHA), or the Integrated Risk Information System (IRIS) Database of the United States Environmental Protection Agency]. A DL of 0.1 µg/L may be proposed and used for all carcinogenic target VOCs from the beginning of the investigation.
 - D. Based on site-specific DQO needs, lower DLs may be required. Examples of sites requiring site-specific DQO needs include, but are not limited to, chlorinated solvents sites, former industrial facilities and landfills. Several less common VOCs, not included on the ASGI-targeted compound list, may require lower detection limits [e.g., bis(chloromethyl)ether, DBCP (1,2-dibromo-3-chloropropane), or ethylene dibromide] when they are known or suspected to be present.
 - E. If the required DLs cannot be achieved by the proposed analytical method, additional sample analysis by a method achieving these DLs [e.g., EPA Method 8260B with selective ion method (SIM), TO-14A, TO-15] may be required. Use of these methods should comply with the QA/QC requirements as specified in Section 2.7.1.
 - F. For results with a high DL reported (e.g., due to matrix interference or dilution), the laboratory should provide a written explanation. Re-sampling and analyses may be required at the appropriate DL for a specific compound.
- 2.7.4 Sample Handling: Exposure to light, changes in temperature and pressure will accelerate sample degradation. To protect sample integrity:
- A. Soil gas samples should not be chilled;
 - B. Soil gas samples should not be subjected to changes in ambient pressure. Shipping of sample containers by air should be avoided; and
 - C. If condensation is observed in the sample container, the sample should be discarded and a new sample should be collected.

2.7.5 Holding Time: All soil gas samples (e.g., samples of VOCs, methane, fixed gases, or biogenic gases), with the exception of hydrogen sulfide samples, should be analyzed within 30 minutes by an on-site mobile laboratory. Hydrogen sulfide samples should be analyzed as specified in Section 2.7.9.B.2. Under the following conditions, holding times may be extended and analyses performed off-site:

- A. Soil gas samples collected in glass bulbs with surrogates added within 15 minutes of collection may be analyzed within 4 hours after collection;
- B. Soil gas samples collected in Summa™ canisters may be analyzed within 72 hours after collection; and
- C. Methane samples may be analyzed as specified in Section 2.7.9.A.2.

2.7.6 Analytical Methods

- A. VOC Samples: All VOC samples should be analyzed using only a Gas Chromatograph/Mass Spectrometer (GC/MS) method (e.g., EPA Method 8260B, used for analysis of soil gas samples, EPA Method TO-14A or TO-15, or equivalent), except at well-characterized sites (e.g., VOCs are known to be present and confirmed based on previous GC/MS analyses). A non-GC/MS method (e.g., EPA Method 8021B, used for analysis of soil gas samples) may be used only for routine monitoring of VOC contamination at well-characterized sites.

If during routine monitoring, new VOC(s) were detected by a non-GC/MS method, then at least 10 percent of the samples with each newly identified VOC should be confirmed by a GC/MS method. Thereafter, routine monitoring can resume with the non-GC/MS method, including the new analyte(s).

- B. Methane and Hydrogen Sulfide Samples: These gas samples should be analyzed using methods specified in Section 2.7.9.

2.7.7 Auto samplers may be used if:

- A. One (1) sample is introduced at a time;
- B. The sample vials are gas-tight and never opened after the sample is added;
- C. Proper holding times are maintained (see Section 2.7.5); and
- D. All samples are secured and under proper custody.

2.7.8 Target Compounds

A. VOCs

1. ASGI-Targeted Compounds: The ASGI (dated February 25, 1997) includes 23 primary and four (4) other target VOCs. All quantifiable results should be reported.
2. Others: The estimated results of all Tentatively Identified Compounds [TICs] or non-ASGI-targeted compounds detected should be included in the report. If TICs or non-ASGI-targeted compounds are identified, contact the Agency to determine whether additional action is required (e.g., running additional standards to quantify TICs or non-ASGI compounds) and whether the use of these estimated data for risk evaluation is appropriate.

B. Leak Check Compounds: All quantifiable results should be reported as specified in Section 2.4.4.E.

C. Specific Compounds: Based on the site history and conditions, analyses for specific compounds may be required by the Agency staff. Examples include:

1. In areas where USTs or fuel pipelines are identified, soil gas samples should be analyzed for oxygenated compounds [e.g., methyl tertiary butyl ether (MTBE), ethyl tertiary butyl ether (ETBE), di-isopropyl ether (DIPE), tertiary amyl methyl ether (TAME), tertiary butyl alcohol (TBA), and ethanol];
2. At oilfield sites where semi-VOCs or Total Petroleum Hydrocarbons (TPHs) are detected in the soil gas samples, fixed and biogenic gas (O₂, CO₂, and CH₄) data should be obtained using a Thermal-Conductivity Detector (TCD) or a hand-held instrument;
3. At petroleum contaminated sites (including oilfields), dairies, wetlands, landfills or other sites where the presence of methane and/or hydrogen sulfide is suspected, soil gas samples should be analyzed for methane and/or hydrogen sulfide;
4. At sites where use of chlorinated solvents with 1,4-dioxane is suspected or known to exist, soil gas samples may be analyzed for 1,4-dioxane with a detection limit of 1 µg/L; or
5. See Section 2.7.9.A.4 below.

2.7.9 Methane and Hydrogen Sulfide Sampling Programs: If the presence of methane and/or hydrogen sulfide is suspected, they should also be included in the analytical plan. After evaluating the initial soil gas data, the Agency may recommend that testing for methane or hydrogen sulfide cease.

A. Methane Sampling Program: Methane samples may be analyzed by a GC using modified EPA Method 8015B, EPA Method TO-3, or ASTM 3416M (EPA 3C), or by an appropriate hand-held instrument (e.g., Land Tech Gas Analyzer GA-90, Gas Emissions Monitor GEM-500, GEM-2000).

1. Detection Limit: The DL for methane analysis should not exceed 500 parts per million by volume (ppmv).
2. Methane Sample Containers: In addition to the gas-tight sample containers previously specified in Section 2.6.1, Tedlar™ bags may be used for collection of methane samples with a holding time of no more than 24 hours.
3. Methane Screening Level: When methane is detected at 1,000 ppmv or more, additional sampling and/or further investigation is recommended to identify the source(s).
4. At sites where methane is investigated and detected at a level of 5,000 ppmv or more, fixed and biogenic gas (O₂, CO₂, and CH₄) data should be obtained using a Thermal-Conductivity Detector (TCD) or a hand-held instrument.
5. To determine that the area is pressurized by migration of gases, pressure readings of each sampling tube system should be recorded in the field logs and reported along with the methane concentration.
6. Special GC Requirements: The GC method requires calibration curves for analytes such as methane since it is not a normal target analyte for such an analytical method.
7. Special Hand-Held Instruments Requirements: Hand-held instruments should be calibrated in accordance with the manufacture's instructions. When a hand-held instrument is used to analyze methane samples, the Agency recommends that at least 10 percent of all positive methane samples (e.g., more than 5,000 ppmv), rounded to the nearest whole number, be confirmed by another hand-held instrument (different unit or brand) or by a GC method.

B. Hydrogen Sulfide Sampling Program: Hydrogen sulfide may be analyzed by a GC using the South Coast Air Quality Management District (SCAQMD) Method 307-91 or EPA Method 16, or by an

appropriate hand-held instrument (e.g., LTX-310 calibrated for hydrogen sulfide or Jerome 631-X).

1. Detection Limit: The DL should be equal to or less than 0.5 ppmv or be sensitive enough to allow for a modeled ambient air concentration (at least one microgram per cubic meter) at the soil surface.
2. Holding Time: Hydrogen sulfide samples should be extracted directly into a hand-held analyzer within 30 minutes of collection to minimize the risk of losing the hydrogen sulfide due to reaction with active surfaces. If a hand-held instrument is not used, hydrogen sulfide samples should be analyzed as below:
 - a. Within 30 minutes of collection, using the GC procedures; or
 - b. Within 24 hours of collection, if a surrogate is added to the samples, or 100 percent duplicate samples are collected.
3. Sample Containers: The following sample containers are recommended:
 - a. Minimum one (1) liter black Tedlar™ bag fitted with polypropylene valves or the equivalent;
 - b. 100-ml gas-tight syringe fitted with an inert valve and wrapped in aluminum foil;
 - c. Gas-tight glass bulb wrapped in aluminum foil; or
 - d. Glass-lined or silicon coated Summa™ canister.
4. Precautions
 - a. Since hydrogen sulfide is extremely unstable in the presence of oxygen and moisture, contact of hydrogen sulfide samples with them should be avoided.
 - b. Due to the high reactivity of hydrogen sulfide gas, contact of hydrogen sulfide samples with metallic or other non-passive surfaces should be avoided during sample collection, storage and analysis.
 - c. Care must be taken so that GC components do not react with the sample. Typically glass-lined injection ports and Teflon™ tube packed columns are used to avoid loss of hydrogen sulfide due to reaction with active surfaces.

3.0 SOIL PARAMETERS

If the soil gas data will be used in a health risk assessment, an estimation of the indoor air concentration should be performed using soil gas data with an Agency approved or modified predictable indoor air model. Default values of input parameters may be used in accordance with the approved indoor air modeling guidance and in consultation with Agency staff. If default values are not used, site-specific soil parameters should be obtained as discussed below.

To assess health risk, indoor air quality, the threat of groundwater contamination from VOCs, or to evaluate the effectiveness of a proposed remedial technology, the following soil matrix parameters should be obtained from a minimum of three (3) sample locations (at depths* corresponding to or associated with the detected VOCs) for each soil type in association with the soil gas investigation:

- 3.1 Soil description performed and presented in accordance with the Unified Soil Classification System (USCS);
- 3.2 Density;
- 3.3 Organic carbon content of the soil** (by the Walkee Black Method);
- 3.4 Soil moisture;
- 3.5 Effective permeability***;
- 3.6 Porosity; and
- 3.7 Grain size distribution analysis (curve) and evaluation of fine-grained soil content (by wet sieve analysis and any supplementary methods as necessary) to determine the percent clay, silt and sand. (The grain size distribution analysis will be used to classify the soil in accordance with the U. S. Soil Conservation Service [SCS] soil type, which is the same as the U. S. Department of Agriculture soil type.)

* Samples may be collected from proposed depths at the continuously cored boring.

** This input parameter is required for soil matrix VOC samples only. This parameter sample should not be collected from an impacted area.

*** As an alternative, the measurements of saturated hydraulic conductivity may be used to estimate vapor permeability.

4.0 REFERENCES

Additional information may be found in the following documents:

American Society for Testing and Materials (ASTM), "Standard Guide for Soil Gas Monitoring in the Vadose Zone, ASTM Standard D 5314-92," January 1993; Reapproved 2001; website <http://www.astm.org>

California Regional Water Quality Control Board, Los Angeles Region, "Interim Guidance for Active Soil Gas Investigation," February 25, 1997

California Regional Water Quality Control Board, Los Angeles Region, "General Laboratory Testing Requirements for Petroleum Hydrocarbon Impacted Sites," June 22, 2000

U.S. Environmental Protection Agency, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, EPA Publication SW-846, Third Edition," November 1986, as amended by Updates I (Jul. 1992), II (Sep. 1994), IIA (August 1993), IIB (Jan. 1995), III (Dec. 1996), IIIA (Apr. 1998), IVA (Jan. 1998) and IVB (Nov. 2000); website <http://www.epa.gov/SW-846/main.html>

U.S. Environmental Protection Agency, "U.S. EPA Contract Laboratory Program National Functional Guidelines for Organic Data Review, EPA 540/R-94/012," February 1994; website <http://www.epa.gov/region09/qa/superfundclp.html>

U.S. Environmental Protection Agency, "Soil Gas Sampling, SOP#: 2042, Revision #: 0.0," June 1, 1996; website http://www.ert.org/respons_resrcs/sops.asp

U.S. Environmental Protection Agency, "Summa Canister Cleaning Procedures, SOP #1703, Rev. #: 0.0," 09/01/94; website http://www.ert.org/respons_resrcs/sops.asp

California Environmental Protection Agency (Cal/EPA), Office of Environmental Health Hazard (OEHHA), Toxicity Criteria Database; website <http://www.oehha.ca.gov/risk/ChemicalDB/index.asp>

United States Environmental Protection Agency, Integrated Risk Information System (IRIS) Database; website <http://www.epa.gov/iris/>

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FOR MORE INFORMATION

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Figures – Soil Gas Probe Emplacement Methods

Figure 1 – Permanent/Semi-permanent Gas Probe Construction Diagram

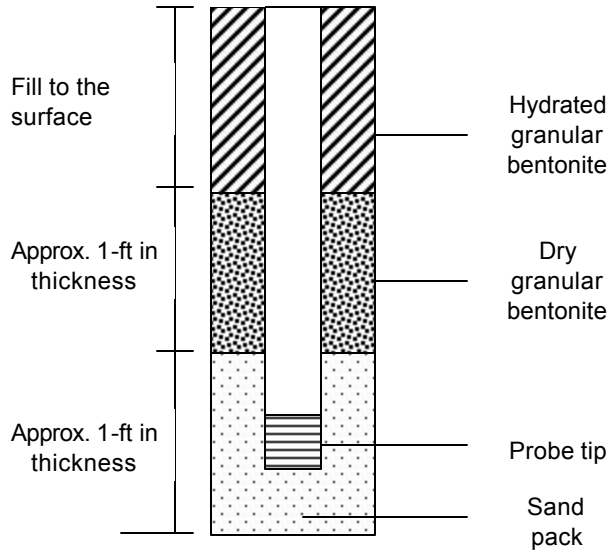
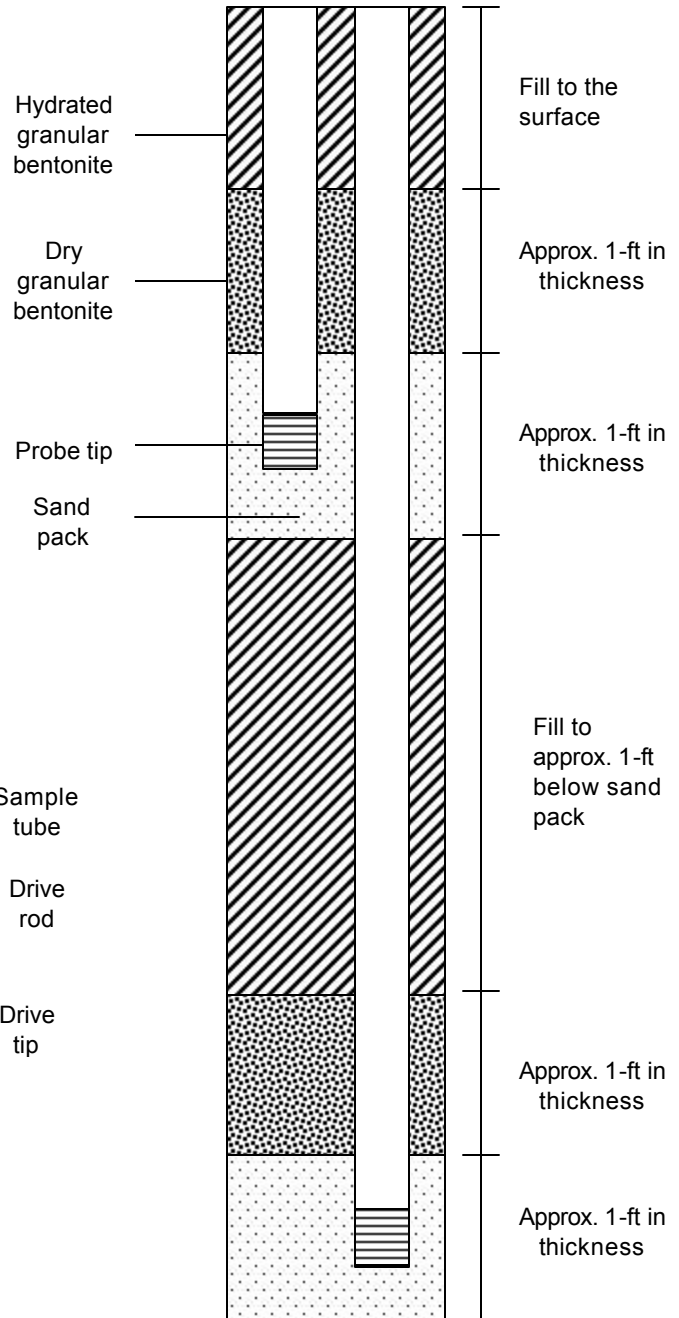


Figure 2 – Multi-depth Gas Probe Construction Diagram



Temporary Gas Probe Method

