

December 14, 2020

Mr. Benjamin McPherson Project Manager New York State Department of Environmental Conservation Department of Environmental Remediation, Region 9 270 Michigan Avenue Buffalo NY 14203-2915

#### Re: 170 Jamison Road Site BCP Site #C915315 Soil Vapor Intrusion Work Plan- Buildings 4 & 4A

Dear Mr. McPherson:

On behalf of our client, Moog Inc. (Moog), Benchmark Environmental Engineering & Science, PLLC, in association with TurnKey Environmental Restoration, LLC (collectively, Benchmark-TurnKey), has prepared this Soil Vapor Intrusion (SVI) work plan for the above referenced Site. This work plan is in response to the New York State Department of Environmental Conservation's (NYSDEC or Department) request for further assessment of indoor air within the Moog complex, specifically Buildings 4 & 4A. A description of the sampling protocols is provided in the section below.

#### Subslab Sampling and Indoor Air Sampling Protocols

To evaluate potential soil vapor intrusion, two (2) subslab vapor (SSV) samples, and two (2) indoor air (IA) samples will be collected from the basement area of Building 4 (the lowest portion of Building 4). One SSV/IA sample will be collected from the continuously occupied office area and one SSV/IA sample will be collected from the electrical maintenance area (Figure 1 and 2). Two (2) SSV samples and two (2) IA samples will also be collected from the first floor of Building 4A (Building 4A does not have a basement). The entire area of Building 4A consists of occupied office space. One of the samples will be biased toward the west end of Buildings 4 and 4A, proximate to the BCP Site and the source of the contamination. One (1) outdoor air (OA) sample will be collected concurrent with the SSV/IA samples. Planned sample locations are shown on Figures 1 and 2. The sampling will be completed in general conformance with the New York State Department of Health (NYSDOH) Soil Vapor Intrusion Guidance (October 2006) and Benchmark-TurnKey's Ambient Air and Sub-slab Vapor Sampling Field Operating Procedures provided as Attachment 1 of this work plan. SSV, IA, and OA samples will be collected and sent to a NYSDOH-approved laboratory for analysis of VOCs in accordance with USEPA Method TO-15.

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2558 Hamburg Turnpike, Suite 300 | Buffalo, NY 14218 phone: (716) 856-0599 | fax: (716) 856-0583 Prior to sample collection, the NYSDOH Indoor Air Quality Questionnaire and Building Inventory will be completed for each structure sampled. This information, along with information on sources of potential indoor air contamination, will be identified on a building inventory form.

For the sample collection at the sub-slab vapor sampling location, Benchmark-TurnKey personnel will drill an approximate <sup>1</sup>/<sub>4</sub> inch diameter hole through the concrete slab using a hand-held drill. A <sup>1</sup>/<sub>4</sub> -inch inert tubing (e.g., polyethylene) will be utilized for the sample collection. Holes in the concrete slab will be filled and sealed after completion of the sampling event. Sub-slab vapor samples will be collected in the following general manner:

- After installation of the probes, complete a tracer gas test to verify the integrity of the soil vapor probe seal;
- Upon completion of a successful tracer gas test, three volumes (i.e., the volume of the sample probe and tube) will be purged prior to collecting the samples to ensure samples collected are representative;
- The sub-slab vapor probes will be sealed to the surface with permagum grout, melted beeswax, putty, or other non-VOC containing and non-shrinking products for temporary installation;
- Flow rates for both purging and collecting will not exceed 0.2 liters per minute to minimize outdoor air infiltration during sampling;
- Sub-slab vapor sample canisters will be equipped with an eight (8) hour regulator to allow the sample to be collected over an approximate eight (8) hour period; and,
- Samples will be collected in an appropriate container which meets the requirements of the sampling and analytical methods (e.g., low flow rate; Summa® canisters if analyzed by EPA Method TO-15) and is certified clean by the laboratory.

One concurrent IA sample will be collected adjacent to the SSV sample location at 4 to 5 feet above ground level to represent the breathing zone. One concurrent field-located OA sample will also be collected from a ground level location upwind of the facility, as determined on the day of sub-slab vapor sampling field activities. IA and OA sample canisters will also be equipped with eight (8) hour regulators to allow the samples to be collected over the same approximate eight (8) hour period as the sub-slab vapor sample.

Each canister, with an initial pressure of approximately 30 pounds per square inch (psi), will be fitted with a sampling valve that uses a critical orifice and mass flow controller to regulate the air flow into the canister for the selected sampling period. The mass flow controller will maintain a relative constant air flow rate throughout the sampling period. Summa® canister valves will remain closed until the sample holes are complete and all the canisters are in their respective positions. The valves will then be opened for the designated collection period.



Soil vapor samples will be collected in Summa® canisters, and once filled will be transported under chain-of-custody command to a NYSDOH-approved Environmental Laboratory Accreditation Program (ELAP) laboratory for analysis of USEPA TCL VOCs in accordance with USEPA Method TO-15 [the laboratory detection limits for trichloroethene, carbon tetrachloride, and vinyl chloride for indoor and outdoor (ambient) air samples should be 0.25 ug/m<sup>3</sup> or less].

Field documentation of SSV/IA/OA sampling activities will be consistent with the NYSDOH guidance. Data evaluation will be performed by a third-party data validator upon receipt of the laboratory sampling results. Benchmark-TurnKey will summarize the results in a letter report submitted to the Department and NYSDOH.

#### Reporting

A letter report summarizing the results of the SVI investigation in Buildings 4 and 4A will be submitted to the NYSDEC and NYSDOH and will include the following:

- A building layout figure with sampling locations and results;
- Analytical data packages;
- The Data Usability Summary Report (DUSR); and
- The NYSDOH Indoor Air Quality Questionnaire and Building Inventory form with documentation of pertinent building conditions (as discussed in Attachment 1).

#### Schedule

The work outlined herein will occur during the 2020-2021 heating season under normal building operating conditions. Specifically, the SVI sampling is tentatively planned to be conducted during the last week of December 2020 or January 2021, pending approval.

Please contact us if you have any questions or require additional information.

Sincerely, Benchmark Environmental Engineering & Science, PLLC

Michael Lesakowski Sr. Project Manager/Principal

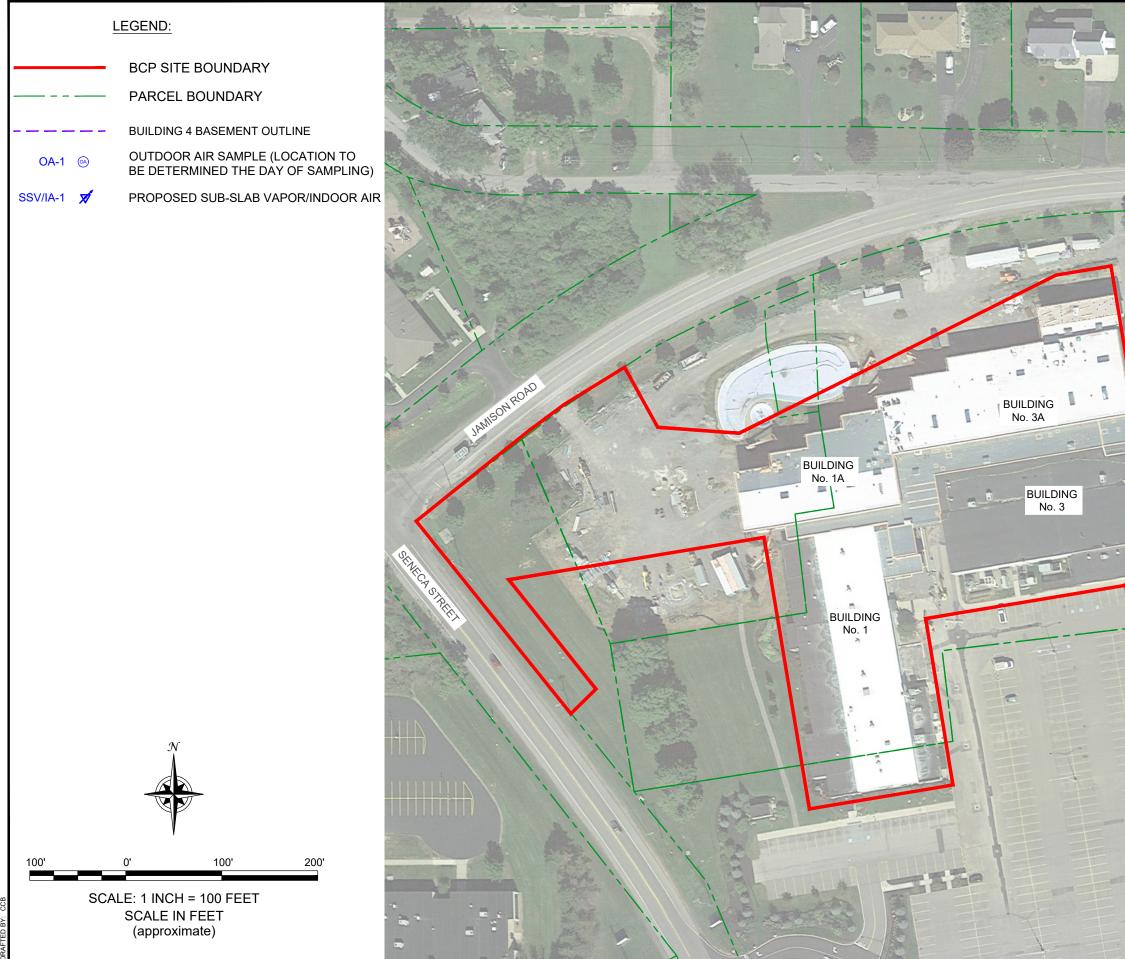
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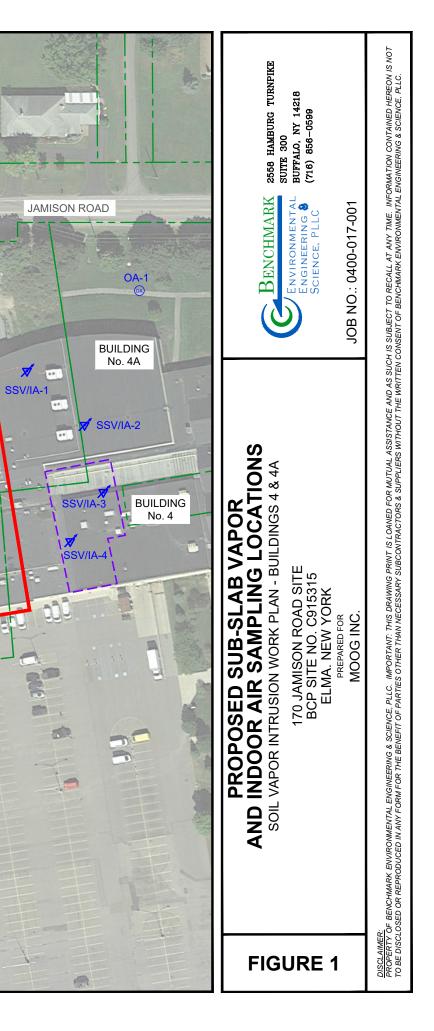


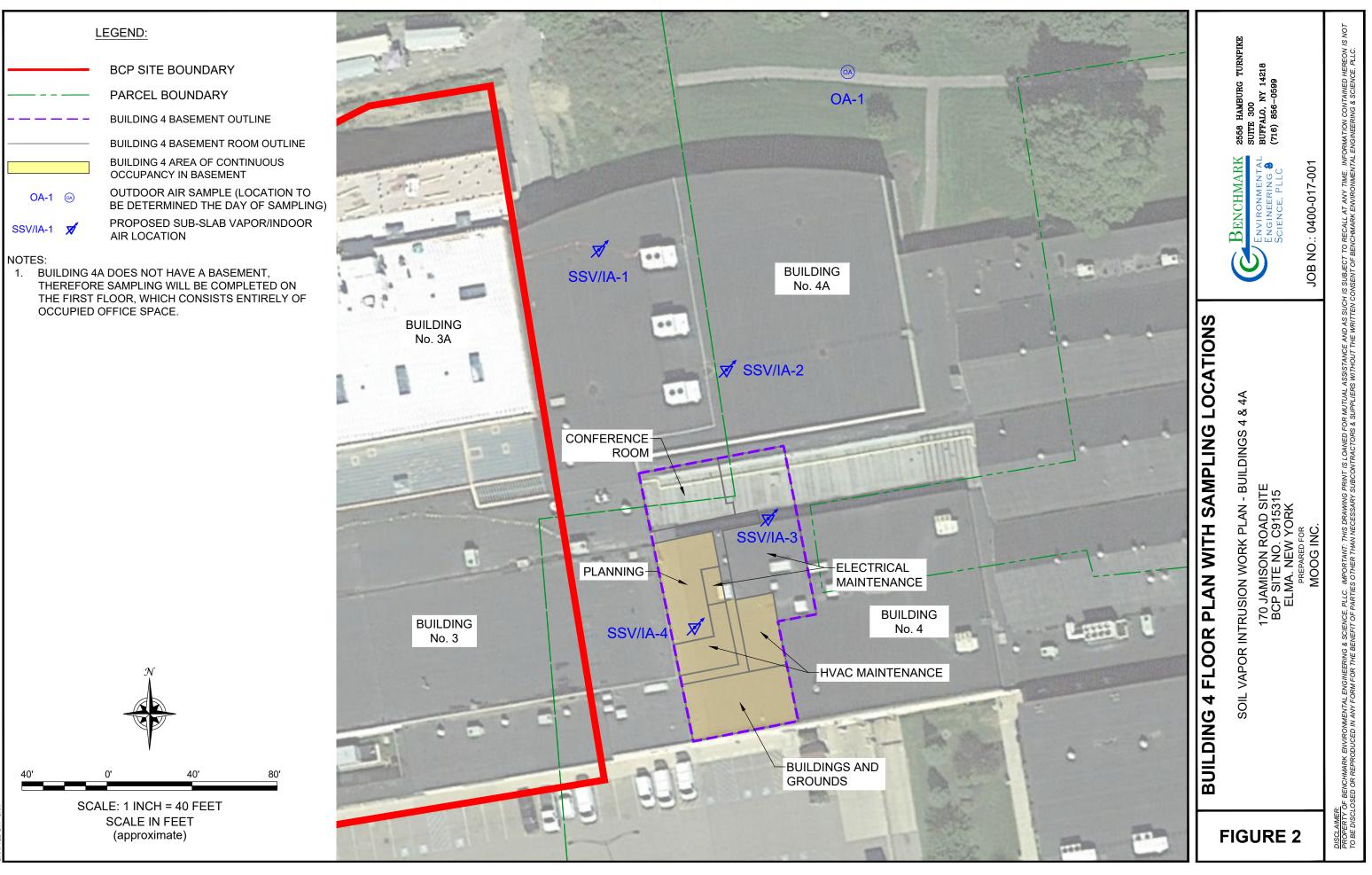
# FIGURES





DATE: DECEMBER 2020





## **ATTACHMENT 1**

AMBIENT AIR AND SUB-SLAB VAPOR SAMPLING FIELD OPERATING PROCEDURES



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### BACKGROUND

In October 2006, the New York State Department of Health (NYSDOH) finalized their vapor intrusion guidance document entitled "Guidance for Evaluating Soil Vapor Intrusion in the State of New York." (www.health.state.ny.us/nysdoh/gas/svi\_guidance/), which has been guiding NYSDOH and New York State Department of Environmental Conservation (NYSDEC) decisions concerning the need for subslab vapor mitigation at sites undergoing investigation, cleanup and monitoring under formal NY Sate remedial programs (e.g., Brownfield Cleanup Program sites, Inactive Hazardous Waste Site Remediation Program sites, etc.). Per the most recent update, May 2017, guidance presents three (3) soil vapor/indoor air matrices to assist in interpreting the comparison of subslab and ambient air data. As of May 2017, eight compounds have been assigned to these three (3) current matrices (i.e., "Matrix A", "Matrix B", and "Matrix C") as follows:

Soil Vapor / Indoor Air Matrix	Volatile Chemical
Matrix A	Carbon tetrachloride
	1,1-Dichloroethene
	cis-1,2-Dichloroethene
	Trichloroethene
Matrix B	Methylene Chloride
	Tetrachlorethene
	1,1,1-Trichloroethane
Matrix C	Vinyl chloride

The matrices are attached as Figures 1, 2, and 3.



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### PURPOSE

The procedures presented herein delineate the scope of additional investigation at a building on the project site to determine if volatile organic compounds (VOCs) detected in groundwater and/or soil near the building are intruding into the building airspace or have the potential, in sufficient concentrations, to adversely impact indoor air quality. The soil vapor, subslab vapor, and ambient air monitoring procedures follow the NYSDOH Guidance for Evaluating Soil Vapor Intrusion in the State of New York (October 2006) as well as USEPA Methods TO-14 and TO-15, for volatile organic compounds (VOCs) using Summa passive canisters.

#### SURVEYS AND PRE-SAMPLING BUILDING PREPARATION (IF REQUIRED)

If required, a pre-sampling inspection should be performed prior to each sampling event to identify and minimize conditions that may interfere with the proposed testing. The inspection should evaluate the type of structure, floor layout, airflows, and physical conditions of the building(s) being studied. This information, along with information on sources of potential indoor air contamination, should be identified on a building inventory form. An example of the building inventory form is attached. Items to be included in the building inventory include the following:

- Construction characteristics, including foundation cracks and utility penetrations or other openings that may serve as preferential pathways for vapor intrusion;
- Presence of an attached garage;
- Recent renovations or maintenance to the building (e.g., fresh paint, new carpet or furniture);
- Mechanical equipment that can affect pressure gradients (e.g., heating systems, clothes dryers or exhaust fans);



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

- Use or storage of petroleum products (e.g., fuel containers, gasoline operated equipment and unvented kerosene heaters); and
- Recent use of petroleum-based finishes or products containing volatile chemicals.

Each room on the floor of the building being tested and on lower floors, if possible, should be inspected. This is important because even products stored in another area of a building can affect the air of the room being tested.

The presence and description of odors (e.g., solvent, moldy) and portable vapor monitoring equipment readings (e.g., PIDs, ppb RAE, Jerome Mercury Vapor Analyzer, etc.) should be noted and used to help evaluate potential sources. This includes taking readings near products stored or used in the building.

Potential interference from products or activities releasing volatile chemicals may need to be controlled. Removing the source from the indoor environment prior to testing is the most effective means of reducing interference. Ensuring that containers are tightly sealed may be acceptable. When testing for volatile organic compounds, containers should be tested with portable vapor monitoring equipment to determine whether compounds are leaking. The inability to eliminate potential interference may be justification for not testing, especially when testing for similar compounds at low levels. The investigator should consider the possibility that chemicals may adsorb onto porous materials and may take time to dissipate.

In some cases, the goal of the testing is to evaluate the impact from products used or stored in the building (e.g., pesticide misapplications, school renovation projects). If the goal of the testing is to determine whether products are an indoor volatile chemical contaminant source, the removing these sources does not apply.



## SOIL VAPOR SAMPLE COLLECTION PROCEDURE

Once interfering conditions are corrected (if applicable), ventilation may be needed prior to sampling to eliminate residual contamination in the indoor air. If ventilation is appropriate, it should be completed 24 hours or more prior to the scheduled sampling time. Where applicable, ventilation can be accomplished by operating the building's HVAC system to maximize outside air intake. Opening windows and doors, and operating exhaust fans may also help or may be needed if the building has no HVAC system.

Air samples are sometimes designed to represent typical exposure in a mechanically ventilated building and the operation of HVAC systems during sampling should be noted on the building inventory form (see attached sample). In general, the building's HVAC system should be operating under normal conditions. Unnecessary building ventilation should be avoided within 24 hours prior to and during sampling. During colder months, heating systems should be operating to maintain normal indoor air temperatures (i.e., 65 - 75 °F) for at least 24 hours prior to and during the scheduled sampling time.

Depending upon the goal of the indoor air sampling, some situations may warrant deviation from the above protocol regarding building ventilation. In such cases, building conditions and sampling efforts should be understood and noted within the framework and scope of the investigation.

To avoid potential interferences and dilution effects, every effort should be made to avoid the following for 24 hours prior to sampling:

- Opening any windows, fireplace dampers, openings or vents;
- Operating ventilation fans unless special arrangements are made;
- Smoking in the building;
- Painting;
- Using a wood stove, fireplace or other auxiliary heating equipment (e.g., kerosene heater);
- Operating or storing automobile in an attached garage;



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- Allowing containers of gasoline or oil to remain within the house or garage area, except for fuel oil tanks;
- Cleaning, waxing or polishing furniture, floors or other woodwork with petroleum- or oil-based products;
- Using air fresheners, scented candles or odor eliminators;
- Engaging in any hobbies that use materials containing volatile chemicals;
- Using cosmetics including hairspray, nail polish, nail polish removers, perfume/cologne, etc.;
- Lawn mowing, paving with asphalt, or snow blowing;
- Applying pesticides; and
- Using building repair or maintenance products, such as caulk or roofing tar.

#### **PRODUCT INVENTORY (IF REQUIRED)**

If required, the primary objective of the product inventory is to identify potential air sampling interference by characterizing the occurrence and use of chemicals and products throughout the building, keeping in mind the goal of the investigation and site-specific contaminants of concern. For example, it is not necessary to provide detailed information for each individual container of like items. However, it is necessary to indicate that "20 bottles of perfume" or "12 cans of latex paint" were present with containers in good condition. This information is used to help formulate an indoor environment profile.

An inventory should be provided for each room on the floor of the building being tested and on lower floors, if possible. This is important because even products stored in another area of a building can affect the air of the room being tested.

The presence and description of odors (e.g., solvent, moldy) and portable vapor monitoring equipment readings (e.g., PIDs, ppb RAE, Jerome Mercury Vapor Analyzer, etc.) should be noted and used to help evaluate potential sources. This includes taking readings near products stored or used in the building. Products in buildings should be inventoried every



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time air is tested to provide an accurate assessment of the potential contribution of volatile chemicals. If available, chemical ingredients of interest (e.g., analyte list) should be recorded for each product. If the ingredients are not listed on the label, record the product's exact and full name, and the manufacturer's name, address and telephone number, if available. In some cases, Material Safety Data Sheets (MSDS) may be useful for identifying confounding sources of volatile chemicals in air. Adequately documented photographs of the products and their labeled ingredients can supplement the inventory and facilitate recording the information.

#### SAMPLE LOCATIONS

The following are types of samples that are collected to investigate the soil vapor intrusion pathway:

- Subsurface vapor samples:
  - *Soil vapor* samples (i.e., soil vapor samples not beneath the foundation or slab of a building) and
  - *Sub-slab vapor* samples (i.e., soil vapor samples immediately beneath the foundation or slab of a building);
- Indoor air samples; and
- Outdoor air samples.

The types of samples that should be collected depend upon the specific objective(s) of the sampling, as described below.

<u>Soil vapor</u>

Soil vapor samples are collected to determine whether this environmental medium is contaminated, characterize the nature and extent of contamination, and identify possible sources of the contamination. Soil vapor sampling results are used when evaluating the following:

- The potential for *current* human exposures;
- The potential for *future* human exposures (e.g., should a building be constructed); and



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

- The effectiveness of measures implemented to remediate contaminated subsurface vapors.

#### <u>Sub-slab vapor</u>

Sub-slab vapor samples are collected to characterize the nature and extent of soil vapor contamination immediately beneath a building with a basement foundation and/or a slab-on-grade. Sub-slab vapor sampling results are used when evaluating the following:

- *Current* human exposures;
- The potential for *future* human exposures (e.g., if the structural integrity of the building changes or the use of the building changes); and
- Site-specific attenuation factors (i.e., the ratio of indoor air to sub-slab vapor concentrations).

Sub-slab vapor samples are collected after soil vapor characterization and/or other environmental sampling (e.g., soil and groundwater characterization) indicate a need. Subslab samples are typically collected concurrently with indoor and outdoor air samples. However, outside of the heating season, sub-slab vapor samples may be collected independently depending on the sampling objective (e.g., characterize the extent of subsurface vapor contamination outside of the heating season to develop a more comprehensive, focused investigation plan for the heating season).

Indoor air

Indoor air samples are collected to characterize exposures to air within a building, including those with earthen floors and crawlspaces. Indoor air sampling results are used when evaluating the following:

- *Current* human exposures;
- The potential for *future* exposures (e.g., if a currently vacant building should become occupied); and
- Site-specific attenuation factors (e.g., the ratio of indoor air to sub-slab vapor concentrations).

Indoor air samples are collected after subsurface vapor characterization and other environmental sampling (e.g., soil and groundwater characterization) indicate a need. When indoor air samples are collected, concurrent sub-slab vapor and



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

outdoor air samples are collected to evaluate the indoor air results appropriately. However, indoor air and outdoor air samples, without sub-slab vapor samples, may be collected when confirming the effectiveness of a mitigation system.

In addition, site-specific situations may warrant collecting indoor air samples prior to characterizing subsurface vapors and/or without concurrent sub-slab sampling due to a need to examine immediate inhalation hazards. Examples of such situations may include, but are not limited to, the following:

- In response to a spill event when there is a need to qualitatively and/or quantitatively characterize the contamination;
- If high readings are obtained in a building when screening with field equipment (e.g., a photoionization detector (PID), an organic vapor analyzer, or an explosimeter) and the source is unknown;
- If significant odors are present and the source needs to be characterized; or
- If groundwater beneath the building is contaminated, the building is prone to groundwater intrusion or flooding (e.g., sump pit overflows), and subsurface vapor sampling is not feasible.
- <u>Outdoor air</u>

Outdoor air samples are collected to characterize site-specific background outdoor air conditions. These samples must be collected simultaneously with indoor air samples. They may also be collected concurrently with soil vapor samples. Outdoor air sampling results are primarily used when evaluating the extent to which outdoor sources may be influencing indoor air quality. They may also be used in the evaluation of soil vapor results (i.e., to identify potential outdoor air interferences associated with the infiltration of outdoor air into the sampling apparatus while the soil vapor sample was collected).



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## SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### SOIL VAPOR SAMPLE COLLECTION PROCEDURES

Soil vapor probe installations (see Figure 4 attached) may be permanent, semi-permanent, or temporary. In general, permanent installations are preferred for data consistency reasons. Soil implants or probes should be constructed in the same manner at all sampling locations to minimize possible discrepancies. The following procedures should be included in any construction protocol:

- Soil vapor probes should be installed using direct push technology or, if necessary to attain the desired depth, using an auger;
- Porous backfill material (e.g., glass beads or coarse sand) should be used to create a sampling zone 1 to 2 feet in length;
- Soil vapor probes should be fitted with inert tubing (e.g., polyethylene, stainless steel, or Teflon®) of the appropriate size (typically 1/8 inch to 1/4 inch diameter) and of laboratory or food grade quality to the surface;
- Soil vapor probes should be sealed above the sampling zone with a bentonite slurry for a minimum distance of 3 feet to prevent outdoor air infiltration and the remainder of the borehole backfilled with clean material;
- For multiple probe depths, the borehole should be grouted with bentonite between probes to create discrete sampling zones; and
- For permanent installations, a protective casing should be set around the top of the probe tubing and grouted in place to the top of bentonite to minimize infiltration of water or outdoor air, as well as to prevent accidental damage.

Soil vapor samples should be collected in the same manner at all locations to minimize possible discrepancies. The following procedures should be included in any sampling protocol:

• At least 24 hours after the installation of permanent probes and shortly after the installation of temporary probes, one to three implant volumes (i.e., the volume of



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

the sample probe and tube) must be purged prior to collecting the samples to ensure samples collected are representative;

- Flow rates for both purging and collecting must not exceed 0.2 liters per minute to minimize outdoor air infiltration during sampling;
- The target final field vacuum after 24 hours will be approximately -5 inches of mercury. Samples with a final field vacuum of greater than -10 inches of mercury, or equal to zero, will be flagged (usability of data will depend on sample volume and reporting limits that can be achieved).
- Samples must be collected, using conventional sampling methods, in an appropriate container one which meets the objectives of the sampling (e.g., investigation of areas where low or high concentrations of volatile chemicals are expected; to minimize losses of volatile chemicals that are susceptible to photodegradation), meets the requirements of the sampling and analytical methods (e.g., low flow rate; Summa® canisters if analyzing by using EPA Method TO-15), and is certified clean by the laboratory;
- Sample size depends upon the volume of sample required to achieve minimum reporting limit requirements; and
- A tracer gas (e.g., helium, butane, or sulfur hexafluoride) must be used when collecting soil vapor samples to verify that adequate sampling techniques are being implemented (i.e., to verify infiltration of outdoor air is not occurring) (discussed later in this procedure). Once verified, continued use of the tracer gas may be reconsidered.

When soil vapor samples are collected, the following actions should be taken to document local conditions during sampling that may influence interpretation of the results:

• If sampling near a commercial or industrial building, uses of volatile chemicals during normal operations of the facility should be identified;



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

- Outdoor plot sketches should be drawn that include the site, area streets, neighboring commercial or industrial facilities (with estimated distance to the site), outdoor ambient air sample locations (if applicable), and compass orientation (north);
- Weather conditions (e.g., precipitation, outdoor temperature, barometric pressure, wind speed and direction) should be noted for the past 24 to 48 hours; and
- Any pertinent observations should be recorded, such as odors and readings from field instrumentation.

The field sampling team must maintain a sample log sheet summarizing the following:

- Sample identification,
- Date and time of sample collection,
- Sampling depth,
- Identity of samplers,
- Sampling methods and devices,
- Purge volumes,
- Volume of soil vapor extracted,
- If canisters used, the vacuum before and after samples collected,
- Apparent moisture content (dry, moist, saturated, etc.) of the sampling zone, and
- Chain of custody protocols and records used to track samples from sampling point to analysis.

#### SUB-SLAB VAPOR SAMPLE COLLECTION PROCEDURES

During colder months, heating systems should be operating to maintain normal indoor air temperatures (i.e., 65 - 75 °F) for at least 24 hours prior to and during the scheduled sampling time. Prior to installation of the sub-slab vapor probe, the building floor should be inspected and any penetrations (cracks, floor drains, utility perforations, sumps, etc.) should be noted and recorded. Probes should be installed at locations where the potential for ambient air infiltration via floor penetrations is minimal.



## SOIL VAPOR SAMPLE COLLECTION PROCEDURE

Sub-slab vapor probe installations (see Figure 5 attached) may be permanent, semipermanent, or temporary. Sub-slab implants or probes should be constructed in the same manner at all sampling locations to minimize possible discrepancies. The following procedures should be included in any construction protocol:

- Permanent recessed probes must be constructed with brass or stainless steel tubing and fittings;
- Temporary probes must be constructed with polyethylene or Teflon® tubing of laboratory or food grade quality;
- Tubing should not extend further than 2 inches into the sub-slab material;
- Coarse sand or glass beads should be added to cover about 1 inch of the probe tip for permanent installations; and
- The soil vapor probe should be sealed to the surface with permagum grout, melted beeswax, putty or other non-VOC-containing and non-shrinking products for temporary installations or cement for permanent installations.

Sub-slab vapor samples should be collected in the following manner:

- After installation of the probes, one to three volumes (i.e., the volume of the sample probe and tube) must be purged prior to collecting the samples to ensure samples collected are representative;
- Flow rates for both purging and collecting must not exceed 0.2 liters per minute to minimize outdoor air infiltration during sampling;
- The target final field vacuum after 24 hours will be approximately -5 inches of mercury. Samples with a final field vacuum of greater than -10 inches of mercury, or equal to zero, will be flagged (usability of data will depend on sample volume and reporting limits that can be achieved).
- Samples must be collected, using conventional sampling methods, in an appropriate container one which meets the objectives of the sampling (e.g., investigation of areas where low or high concentrations of volatile chemicals are expected; to minimize losses of volatile chemicals that are susceptible to photodegradation), meets the requirements of the sampling and analytical methods (e.g., low flow rate; Summa® canisters if analyzing by using EPA Method TO-15), and is certified clean by the laboratory;



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- Sample size depends upon the volume of sample required to achieve minimum reporting limit requirements [Section 2.9 of the Guidance], the flow rate, and the sampling duration; and
- Ideally, samples should be collected over the same period of time as concurrent indoor and outdoor air samples.

When sub-slab vapor samples are collected, the following actions should be taken to document conditions during sampling and ultimately to aid in the interpretation of the sampling results:

- If sampling within a commercial or industrial building, uses of volatile chemicals in commercial or industrial processes and/or during building maintenance, should be identified;
- The use of heating or air conditioning systems during sampling should be noted;
- Floor plan sketches should be drawn that include the floor layout with sample locations, chemical storage areas, garages, doorways, stairways, location of basement sumps or subsurface drains and utility perforations through building foundations, HVAC system air supply and return registers, compass orientation (north), and any other pertinent information should be completed;
- If possible, photographs should accompany floor plan sketches;
- Outdoor plot sketches should be drawn that include the building site, area streets, outdoor air sample locations (if applicable), compass orientation (north), footings that create separate foundation sections, and paved areas;
- Weather conditions (e.g., precipitation, indoor and outdoor temperature, and barometric pressure) and ventilation conditions (e.g., heating system active and windows closed) should be reported;
- Smoke tubes or other devices should be used to confirm pressure relationships and air flow patterns, especially between floor levels and between suspected contaminant sources and other areas; and
- Any pertinent observations, such as spills, floor stains, smoke tube results, odors and readings from field instrumentation (e.g., vapors via PID, ppb RAE, Jerome Mercury Vapor Analyzer, etc.), should be recorded.



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

The field sampling team must maintain a sample log sheet summarizing the following:

- Sample identification,
- Date and time of sample collection,
- Sampling depth,
- Identity of samplers,
- Sampling methods and devices,
- Soil vapor purge volumes,
- Volume of soil vapor extracted,
- If canisters used, the vacuum before and after samples collected,
- Apparent moisture content (dry, moist, saturated, etc.) of the sampling zone, and
- Chain of custody protocols and records used to track samples from sampling point to analysis.

The following describes the subslab air sampling procedure:

- 1. Canisters will be supplied by the laboratory that will be conducting the analysis.
- 2. Sampling will take place in accordance with the project work plan sufficiently spaced to allow locations to be modified, if necessary.
- 3. The number of Summa canisters required as well as the flow rate of the constant differential low volume flow controllers will be supplied by the laboratory in accordance with the project work plan.
- 4. The sampling program will consist of concurrently collecting and analyzing one sub-slab vapor sample and one indoor ambient air sample (discussed in the next section). Sample locations should be selected based on the likelihood for potential continuous human occupancy during the workday (i.e., due to the size of the areas and available infrastructure), and to account for the possibility of varying foundation depths in different areas of the building. In addition, sample locations typically are based upon the results of a subsurface investigation (i.e., soil gas survey or boring advancement) conducted prior to air sample collection activities. Canisters are typically placed in areas where the highest concentrations of soil gas were observed. Indoor air sample locations



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

preferably should be selected near the middle of the sampled room, well away from the edges where dilution is more likely to occur.

- 5. Collect at least one outdoor ambient air sample from a location on the building roof or designated background area of the site positioned away from building ventilation system equipment on the highest portion of the building roof or site. See the Outdoor Ambient Air Sampling Procedure section in this procedure.
- 6. Field personnel should assure conservative sampling conditions prior to and throughout the sampling event. The building should be closed (windows and doors shut) and existing building ventilation systems should be turned off 12 to 24 hours before the air sampling is scheduled to begin as well as during sample collection. Any air-handling units that may induce large pressure gradients (i.e., exhaust fans, HVAC units etc.) should also be turned off.
- 7. Any activity being conducted by current building tenants involving volatile organic compounds, such as the use of lacquer thinner and cleaning solvents, prior to and/or during air sampling activities should be noted in the Project Field Book. These activities have the potential to bias the analytical results.
- 8. At each location, drill an approximately <sup>3</sup>/<sub>4</sub>-inch diameter hole through the concrete slab (typically 6-8 inches thick) using a hand-held hammer drill.
- 9. Measure and record the concrete thickness in the Project Field Book.
- 10. Insert polyethylene or Teflon® tubing of laboratory or food grade quality into the drilled hole and <u>no further than 2 inches</u> into the subslab material.
- 11. Seal the tubing with an appropriately sized volatile organic compound-free stopper (i.e., permagum grout, melted beeswax, putty, or other non-VOC-containing and non-shrinking product) into the concrete core hole and secure in-place making sure the fit is very snug. Supplement any visible gaps between the stopper and concrete slab with a VOC-free sealant, such as beeswax or bentonite slurry.



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- 12. Run the tubing assembly through a shroud (plastic pail, cardboard box, or garbage bag) creating a tight seal with the surface making sure not to disturb the seal around the tubing penetration.
- 13. Enrich the atmosphere of the shroud with helium. Measure and record the helium concentration within the shroud.
- 14. Purge approximately 1 to 3 tubing volumes (i.e., the volume of the sample probe and tube) using a hand pump (or similar approved device) to ensure the collection of a representative sample.
- 15. Flow rates for both purging and sample collection must not exceed 0.2 liters per minute to minimize outdoor air infiltration during sampling.
- 16. Use a portable monitoring device to analyze a sample of soil vapor for the tracer **prior to and after** sampling for the compounds of concern. Note that the tracer gas samples can be collected via syringe, Tedlar bag etc. They need not be collected in Summa<sup>®</sup> canisters or minicans.
- 17. If concentrations greater than 10% of tracer gas are observed either prior to and/or after sampling, the probe seal should be enhanced to reduce the infiltration of outdoor air. Following enhancement of the seal, repeat steps 14 through 17 above until purged concentrations are less than 10% of the tracer gas within the shroud.
- 18. Following tubing purge and adequate seal integrity testing via helium tracer gas, immediately attach a 6-liter Summa Canister fitted with a 24-hour regulator (or approved other duration) to the opposite end of the tubing. Concurrent with each subslab sample location, prepare an indoor ambient air sample by staging a second Summa Canister on a ladder (approximately 2 to 5-feet above the floor) adjacent to the sub-slab sample location.
- 19. All Summa Canister valves should remain closed until all subslab borings are complete and all of the canisters in their respective positions.



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

- Open the valves to all of the canisters for the required collection period (i.e., 24-hours). Record initial canister pressure on the Air Canister Field Record form.
- 21. Following sample collection and prior to closing canister valve, record final canister pressure on the Air Canister Field Record form. Close canister valve.
- 22. Collect all Summa Canisters and ship, under chain-of-custody command to an approved analytical laboratory for VOC analysis in accordance with USEPA Method TO-14 or TO-15.
- 23. Repair all concrete openings with a cement patch.
- 24. Analytical results submitted by the laboratory should be reported as concentrations of each VOC at each location, typically in parts per billion by volume (ppbv).

#### INDOOR AIR SAMPLE COLLECTION PROCEDURES

During colder months, heating systems should be operating to maintain normal indoor air temperatures (i.e., 65 - 75 °F) for at least 24 hours prior to and during the scheduled sampling time. If possible, prior to collecting indoor samples, a pre-sampling inspection, discussed earlier in this procedure, should be performed to evaluate the physical layout and conditions of the building being investigated, to identify conditions that may affect or interfere with the proposed sampling, and to prepare the building for sampling.

In general, indoor air samples should be collected in the following manner:

Sampling duration should reflect the exposure scenario being evaluated without compromising the detection limit or sample collection flow rate (e.g., an 8 hour sample from a workplace with a single shift versus a 24 hour sample from a workplace with multiple shifts). To ensure that air is representative of the locations sampled and to avoid undue influence from sampling personnel, samples should be collected for at least 1 hour. If the goal of the sampling is to



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

represent average concentrations over longer periods, then longer duration sampling periods may be appropriate. Typically, 24 hour samples are collected from residential settings;

- Personnel should avoid lingering in the immediate area of the sampling device while samples are being collected;
- Sample flow rates must conform to the specifications in the sample collection method and, if possible, should be consistent with the flow rates for concurrent outdoor air and sub-slab samples;
- The target final field vacuum after 24 hours will be approximately -5 inches of mercury. Samples with a final field vacuum of greater than -10 inches of mercury, or equal to zero, will be flagged (usability of data will depend on sample volume and reporting limits that can be achieved); and
- Samples must be collected, using conventional sampling methods, in an appropriate container one which meets the objectives of the sampling (e.g., investigation of areas where low or high concentrations of volatile chemicals are expected; to minimize losses of volatile chemicals that are susceptible to photodegradation), meets the requirements of the sampling and analytical methods (e.g., low flow rate; Summa® canisters if analyzing by using EPA Method TO-15), and is certified clean by the laboratory.

At sites with tetrachloroethene contamination, passive air monitors that are specifically analyzed for tetrachloroethene (i.e., "perc badges") are commonly used to collect indoor and outdoor air samples. If site characterization activities indicate that degradation products of tetrachloroethene also represent a vapor intrusion concern, perc badges may be used to indicate the likelihood of vapor intrusion (i.e., by using tetrachloroethene as a surrogate) followed, as needed, by more comprehensive sampling and laboratory analyses to quantify both tetrachloroethene and its degradation products. Perc badge samples ideally should be collected over a twenty-four hour period, but for no less than eight hours.



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

The following actions should be taken to document conditions during indoor air sampling and ultimately to aid in the interpretation of the sampling results:

- A product inventory survey must be completed (discussed earlier);
- The use of heating or air conditioning systems during sampling should be noted;
- Floor plan sketches should be drawn that include the floor layout with sample locations, chemical storage areas, garages, doorways, stairways, location of basement sumps or subsurface drains and utility perforations through building foundations, HVAC system supply and return registers, compass orientation (north), and any other pertinent information should be completed;
- If possible, photographs should accompany floor plan sketches;
- Outdoor plot sketches should be drawn that include the building site, area streets, outdoor air sample locations (if applicable), compass orientation (north), footings that create separate foundation sections, and paved areas;
- Weather conditions (e.g., precipitation, indoor and outdoor temperature, and barometric pressure) and ventilation conditions (e.g., heating system active and windows closed) should be reported;
- Smoke tubes or other devices should be used to confirm pressure relationships and air flow patterns, especially between floor levels and between suspected contaminant sources and other areas; and
- Any pertinent observations, such as spills, floor stains, smoke tube results, odors and readings from field instrumentation (e.g., vapors via PID, ppb RAE, Jerome Mercury Vapor Analyzer, etc.), should be recorded.

The field sampling team must maintain a sample log sheet summarizing the following:

- Sample identification,
- Date and time of sample collection,
- Sampling height,



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

- Identity of samplers,
- Sampling methods and devices,
- Depending upon the method, volume of air sampled,
- If canisters used, the vacuum before and after samples collected,
- Chain of custody protocols and records used to track samples from sampling point to analysis.

The following describes the indoor air sampling procedure:

- 1. Canisters will be supplied by the laboratory that will be conducting the analysis.
- 2. Sampling will take place in accordance with the project work plan sufficiently spaced to allow locations to be modified, if necessary.
- 3. The number of Summa canisters required as well as the flow rate of the constant differential low volume flow controllers will be supplied by the laboratory in accordance with the project work plan. Indoor air sampling typically requires the continuous collection of samples over a 24-hour period.
- 4. The sampling program will consist of concurrently collecting and analyzing one sub-slab vapor sample and one indoor ambient air sample. Sample locations should be selected based on the likelihood for potential continuous human occupancy during the workday (i.e., due to the size of the areas and available infrastructure), and to account for the possibility of varying foundation depths in different areas of the building. In addition, sample locations typically are based upon the results of a subsurface investigation (i.e., soil gas survey or boring advancement) conducted prior to air sample collection activities. Canisters are typically placed in areas where the highest concentrations of soil gas were observed. Indoor air sample locations preferably should be selected near the middle of the sampled room, well away from the edges where dilution is more likely to occur.
- 5. Collect at least one outdoor ambient air sample from a location on the building roof or designated background area of the site positioned away from building ventilation system equipment on the highest portion of the building



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

roof or site. See the Outdoor Ambient Air Sampling Procedure presented in this procedure.

- 6. Field personnel should assure conservative sampling conditions prior to and throughout the sampling event. The building should be closed (windows and doors shut) and existing building ventilation systems should be turned off 12 to 24 hours before the air sampling is scheduled to begin as well as during sample collection. Any air-handling units that may induce large pressure gradients (i.e., exhaust fans, HVAC units etc.) should also be turned off.
- 7. Any activity being conducted by current building tenants involving volatile organic compounds, such as the use of lacquer thinner and cleaning solvents, prior to and/or during air sampling activities should be noted in the Project Field Book. These activities have the potential to bias the analytical results.
- 8. Concurrent with each subslab sample location, prepare an indoor ambient air sample by staging a second Summa Canister on a ladder (approximately 2 to 5-feet above the floor) adjacent to the sub-slab sample location.
- 9. All Summa Canister valves should remain closed until all subslab borings are complete and all of the canisters in their respective positions.
- Open the valves to all of the canisters for the required collection period (i.e., 24-hours). Record initial canister pressure on the Air Canister Field Record form.
- 11. Following sample collection and prior to closing canister valve, record final canister pressure on the Air Canister Field Record form. Close canister valve.
- 12. Collect all Summa Canisters and ship, under chain-of-custody command to an approved analytical laboratory for VOC analysis in accordance with USEPA Method TO-14 or TO-15.
- 13. Analytical results submitted by the laboratory should be reported as concentrations of each VOC at each location, typically in parts per billion by volume (ppbv).



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#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### **OUTDOOR AIR SAMPLE COLLECTION PROCEDURES**

Outdoor air samples must be collected simultaneously with indoor air samples and may be collected concurrently with subsurface vapor samples. Outdoor air samples must be collected in the same manner as indoor samples.

The following actions should be taken to document conditions during outdoor air sampling and ultimately to aid in the interpretation of the sampling results:

- Outdoor plot sketches should be drawn that include the building site, area streets, outdoor air sample locations (if applicable), the location of potential interferences (e.g., gasoline stations, factories, lawn movers, etc.), compass orientation (north), footings that create separate foundation sections, and paved areas;
- Weather conditions (e.g., precipitation, indoor and outdoor temperature, and barometric pressure) and ventilation conditions (e.g., heating system active and windows closed) should be reported; and
- Any pertinent observations, such as odors, readings from field instrumentation, and significant activities in the vicinity (e.g., operation of heavy equipment or dry cleaners) should be recorded.

The following describes the outdoor air sampling procedure:

- 1. Canisters will be supplied by the laboratory that will be conducting the analysis.
- 2. Sampling will take place in accordance with the project work plan sufficiently spaced to allow locations to be modified, if necessary.
- 3. The number of Summa canisters required as well as the flow rate of the constant differential low volume flow controllers will be supplied by the laboratory in accordance with the project work plan.
- 4. Sample locations typically are collected upwind of the facility.



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

- 5. Collect at least one outdoor ambient air sample from a location on the building roof or designated background area of the site positioned away from building ventilation system equipment on the highest portion of the building roof or site. Place canisters on the ground or step ladder, with a clear plastic sheet beneath to prevent contamination. Locate the sampling inlet approximately 18-inches above the ground surface.
- 6. Sample collection should take place on warm, dry days. If rain or high humidity conditions develop during sampling, the sampling event should be suspended. Temperature, barometric pressure, and wind speed should be monitored during the sampling event, for use in analysis of the results.
- 7. The combination of sampling location, height, and meteorological conditions will assure that sampling will measure VOCs at their highest concentrations.
- 8. All Summa Canister valves should remain closed until all subslab borings are complete and all of the indoor and outdoor canisters in their respective positions.
- Open the valves to all of the canisters for the required collection period (i.e., 24-hours). Record initial canister pressure on the Air Canister Field Record form.
- 10. Following sample collection and prior to closing canister valve, record final canister pressure on the Air Canister Field Record form. Close canister valve.
- 11. Collect all Summa Canisters and ship, under chain-of-custody command to an approved analytical laboratory for VOC analysis in accordance with USEPA Method TO-14 or TO-15.
- 12. Air samples will be analyzed by Gas Chromatography/Mass Spectroscopy (GC/MS) in accordance with EPA Method TO-14 or TO-15.



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

13. Analytical results will be reported as concentrations of each VOC at each location during each sampling event, typically in parts per billion by volume (ppbv).

## TRACER GAS

When collecting soil vapor samples as part of a vapor intrusion evaluation, a tracer gas serves as a quality assurance/quality control device to verify the integrity of the soil vapor probe seal. Without the use of a tracer, there is no way to verify that a soil vapor sample has not been diluted by surface air.

Depending on the nature of the contaminants of concern, a number of different compounds can be used as a tracer. Typically, sulfur hexafluoride (SF6) or helium are used as tracers because they are readily available, have low toxicity, and can be monitored with portable measurement devices. Butane and propane (or other gases) could also be used as a tracer in some situations. The protocol for using a tracer gas is straightforward: simply enrich the atmosphere in the immediate vicinity of the area where the probe intersects the ground surface with the tracer gas, and measure a vapor sample from the probe for the presence of high concentrations (> 10%) of the tracer. A cardboard box, a plastic pail, or even a garbage bag can serve to keep the tracer gas in contact with the probe during the testing.

There are two basic approaches to testing for the tracer gas:

- Include the tracer gas in the list of target analytes reported by the laboratory; or
- Use a portable monitoring device to analyze a sample of soil vapor for the tracer prior to and after sampling for the compounds of concern. (Note that the tracer gas samples can be collected via syringe, Tedlar bag etc. They need not be collected in Summa® canisters or minicans.)



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

The advantage of the second approach is that the real time tracer sampling results can be used to confirm the integrity of the probe seals prior to formal sample collection. Figure 6 (attached) depicts common methods for using tracer gas. In each of the examples, a, b and c, the tracer gas is released in the enclosure prior to initially purging the sample point. Care should be taken to avoid excessive purging prior to sample collection. Care should also be taken to prevent pressure build-up in the enclosure during introduction of the tracer gas. Inspection of the installed sample probe, specifically noting the integrity of the surface seal and the porosity of the soil in which the probe is installed, will help to determine the tracer gas setup. Figure 6(a) may be most effective at preventing tracer gas infiltration; however, it may not be required in some situations depending on site-specific conditions. Figures 6(b) and 6(c) may be sufficient for probes installed in tight soils with well-constructed surface seals. In all cases, the same tracer gas application should be used for all probes at any given site.

Because minor leakage around the probe seal should not materially affect the usability of the soil vapor sampling results, the mere presence of the tracer gas in the sample should not be a cause for alarm. Consequently, portable field monitoring devices with detection limits in the low ppm range are more than adequate for screening samples for the tracer. If high concentrations (> 10%) of tracer gas are observed in a sample, the probe seal should be enhanced to reduce the infiltration of ambient air.

During the initial stages of a soil vapor sampling program, tracer gas samples should be collected at each of the sampling probes. If the results of the initial samples indicate that the probe seals are adequate, the project manager can consider reducing the number of locations at which tracer gas samples are employed. At a minimum, at least 10% of the subsequent samples should be supported with tracer gas analyses. When using permanent soil vapor probes as part of a long-term monitoring program, annual testing of the probe integrity is recommended.



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## SOIL VAPOR SAMPLE COLLECTION PROCEDURE

## QUALITY ASSURANCE / QUALITY CONTROL (QA/QC)

Extreme care should be taken during all aspects of sample collection to ensure that sampling error is minimized and high quality data are obtained. The sampling team members should avoid actions (e.g., fueling vehicles, using permanent marking pens, and wearing freshly drycleaned clothing or personal fragrances), which can cause sample interference in the field. Appropriate QA/QC protocols must be followed for sample collection and laboratory analysis, such as use of certified clean sample devices, meeting sample holding times and temperatures, sample accession, chain of custody, etc. Samples should be delivered to the analytical laboratory as soon as possible after collection. In addition, laboratory accession procedures must be followed including field documentation (sample collection information and locations), chain of custody, field blanks, field sample duplicates, and laboratory duplicates, as appropriate.

Some methods require collecting samples in duplicate (e.g., indoor air sampling using passive sampling devices for tetrachloroethene) to assess errors. Duplicate and/or split samples should be collected in accordance with the requirements of the sampling and analytical methods being implemented.

For certain regulatory programs, a Data Usability Summary Report (DUSR) may be required to determine whether or not the data, as presented, meets the site or project specific criteria for data quality and data use. This requirement may dictate the level of QC and the category of data deliverable to request from the laboratory. Guidance on preparing a DUSR is available by contacting the NYSDEC's Division of Environmental Remediation.

New York State Public Health Law requires laboratories analyzing environmental samples collected from within New York State to have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix



## SOIL VAPOR SAMPLE COLLECTION PROCEDURE

combinations. If ELAP certification is not currently required for an analyte (e.g., trichloroethene), the analysis should be performed by a laboratory that has ELAP certification for similar compounds in air and uses analytical methods with detection limits similar to background (e.g., tetrachloroethene via EPA Method TO-15).

The work plan must state that all samples that will be used to make decisions on appropriate actions to address exposures and environmental contamination will be analyzed by an ELAP-certified laboratory. If known, the name of the laboratory should also be provided. Similarly, the name of the laboratory that was used must be included in the report of the sampling results. For samples collected and tested in the field for screening purposes by using field testing technology, the qualifications of the field technician must be documented in the work plan.

The target final field vacuum of any sample canister after 24 hours will be approximately -5 inches of mercury. Samples with a final field vacuum of greater than -10 inches of mercury, or equal to zero, will be flagged (usability of data will depend on sample volume and reporting limits that can be achieved).

## **DECISION MATRICES (FIGURES 1, 2, AND 3)**

The considerations in assigning a chemical to a matrix include the following:

- Human health risks, including such factors as a chemical's ability to cause cancer, reproductive, developmental, liver, kidney, nervous system, immune system or other effects, in animals and humans and the doses that may cause those effects;
- The data gaps in its toxicological database;
- Background concentrations of volatile chemicals in indoor air [Section 3.2.4]; and
- Analytical capabilities currently available.



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

To use the matrices accurately as a tool in the decision-making process, the following must be noted:

- The matrices are generic. As such, it may be necessary to modify recommended actions to accommodate building-specific conditions (e.g., dirt floor in basement, crawl spaces, etc.) and/or site-specific conditions (e.g., proximity of building to identified subsurface contamination) for the protection of public health. Additionally, actions more conservative than those specified within the matrix may be implemented at any time. For example, the decision to implement more conservative actions may be based on a comparison of the costs associated with resampling or monitoring to the costs associated with installation and monitoring of a mitigation system.
- Indoor air concentrations detected in samples collected from the building's basement or, if the building has a slab-on-grade foundation, from the building's lowest occupied living space should be used.
- Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude the need to investigate possible sources of vapor contamination, nor does it preclude the need to remediate contaminated soil vapors or the source of soil vapor contamination.
- When current exposures are attributed to sources other than vapor intrusion, the agencies must be provided documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix and to support assessment and follow-up by the agencies.

#### **RECOMMENDED ACTIONS**

Actions recommended in the matrix are based on the relationship between sub-slab vapor concentrations and corresponding indoor air concentrations. They are intended to address both potential and current human exposures and include the following:



#### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### • No further action

When the volatile chemical is not detected in the indoor air sample and the concentration detected in the corresponding sub-slab vapor sample is not expected to substantially affect indoor air quality.

• Identify source(s) and resample or mitigate

Reasonable and practical actions are recommended to identify the source(s) affecting indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. The concentration detected in the indoor air sample is likely due to indoor and/or outdoor sources rather than soil vapor intrusion given the concentration detected in the sub-slab vapor sample. Resampling may be required in the event indoor and/or outdoor sources are not readily identified or confirmed to demonstrate SVI mitigation actions are not needed. Steps should be taken to identify potential source(s) and to reduce exposures accordingly (e.g., by keeping containers tightly capped or by storing volatile chemical-containing products in places where people do not spend much time, such as a garage or shed). Mitigation may be required if soil vapor intrusion cannot be ruled out.

Monitor

Monitoring, including sub-slab vapor, basement air, lowest occupied living space air, and outdoor air sampling, is needed to determine whether concentrations in the indoor air or sub-slab vapor have changed. Monitoring may also be needed to determine whether existing building conditions (e.g., positive pressure HVAC systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined on a site-specific and building specific basis, taking into account applicable environmental data and building operating conditions.

Mitigate

Mitigation is needed to minimize current or potential exposures associated with soil vapor intrusion. Methods to mitigate exposures related to soil vapor intrusion are described in Section 4 of the Guidance.



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# SOIL VAPOR SAMPLE COLLECTION PROCEDURE

### TIME OF YEAR

Sub-slab vapor samples and, unless there is an immediate need for sampling, indoor air samples are typically collected during the heating season because soil vapor intrusion is more likely to occur when a building's heating system is in operation and air is being drawn into the building. In general, heating systems are expected to be operating routinely from November 15th to March 31st throughout the state. However, this timeframe may vary depending on factors, such as the location of the site (e.g., upstate versus downstate) and the weather conditions for a particular year.

A vapor intrusion investigation may also be conducted outside of the heating season. However, the results may not be used to rule out exposures. For example, results indicating "no further action" or "monitoring required" must be verified during the heating season to ensure these actions are protective during the heating season as well.

# SAMPLING ROUNDS

Investigating a soil vapor intrusion pathway usually requires more than one round of subsurface vapor, indoor air, and/or outdoor air sampling, for reasons such as the following:

- To characterize the nature and extent of subsurface vapor contamination (similar to the delineation of groundwater contamination) and to address corresponding exposure concerns;
- To evaluate fluctuations in concentrations due to
  - Different weather conditions (e.g., seasonal effects),
  - Changes in building conditions (e.g., various operating conditions of a building's HVAC system),
  - Changes in source strength, or
  - Vapor migration or contaminant biodegradation processes (particularly when degradation products may be more toxic than the parent compounds); or



# SOIL VAPOR SAMPLE COLLECTION PROCEDURE

• To confirm sampling results or the effectiveness of mitigation or remedial systems.

Overall, successive rounds of sampling are conducted until the following questions can be answered:

- Are subsurface vapors contaminated? If so, what are the nature and extent of contamination? What is/are the source(s) of the contamination?
- What are the current and potential exposures to contaminated subsurface vapors?
- What actions, if any, are needed to prevent or mitigate exposures and to remediate subsurface vapor contamination?

Toward this end, multiple rounds of sampling may be required to characterize the nature and extent of subsurface vapor contamination such that

- Both potential and current exposures are adequately addressed;
- Measures can be designed to remediate subsurface vapor contamination, either directly (e.g., SVE system) or indirectly (e.g., soil excavation or groundwater remediation), given that monitoring and mitigation are considered temporary measures implemented to address exposures related to vapor intrusion until contaminated environmental media are remediated; and
- The effectiveness of remedial measures can be monitored and confirmed (e.g., endpoint sampling).

# ATTACHMENTS

- Figure 1Soil Vapor/Indoor Air Matrix A
- Figure 2 Soil Vapor/Indoor Air Matrix B
- **Figure 3** Soil Vapor/Indoor Air Matrix C
- Figure 4 Schematics of a permanent soil vapor probe and permanent nested soil vapor probes
- Figure 5Schematic of a sub-slab vapor probe
- Figure 6 Schematics of tracer gas applications

Air Canister Field Record

Indoor Air Quality Questionnaire and Building Inventory



## SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### REFERENCES

New York State Department of Health, Guidance for Evaluating Soil Vapor Intrusion in the State of New York, October 2006.

New York State Department of Health, Indoor Air Sampling & Analysis Guidance. (February 1, 2005).

Office of Solid Waste and Emergency Response (OSWER). Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface Vapor Intrusion Guidance). November 2002.

United States Environmental Protection Agency. EPA Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air. 1988

- Method TO-15, Determination of Volatile Organic Compounds (VOCs) in Air Collected in Specially Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS). Pp. 15-1 through 15-62.
- Method TO-17, Determination of Volatile Organic Compounds in Ambient Air using Active Sampling on Sorbent Tubes. Pp. 17-1 through 17-49.
- Compendium of Methods for the Determination of Air Pollutants in Indoor Air, EPA/600/4-90-010.



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## SOIL VAPOR SAMPLE **COLLECTION PROCEDURE**

#### FIGURE 1

#### Soil Vapor/Indoor Air Matrix A May 2017

Analytes Assigned: Trichloroethene (TCE), cis-1,2-Dichloroethene (c12-DCE), 1,1-Dichloroethene (11-DCE), Carbon Tetrachloride

	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m <sup>3</sup> )		
SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m <sup>3</sup> )	< 0.2	0.2 to < 1	1 and above
< 6	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
6 to < 60	4. No further action	5. MONITOR	6. MITIGATE
60 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

No further action: No additional actions are recommended to address human exposures.

Identify Source(s) and Resample or Mitigate: We recommend that reasonable and practical actions be taken to identify the source(s) affecting the indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. For example, if an indoor or outdoor air source is identified, we recommend the appropriate party implement actions to reduce the levels. In the event that indoor or outdoor sources are not readily identified or confirmed, resampling (which might include additional sub-slab vapor and indoor air sampling locations) is recommended to demonstrate that SVI mitigation actions are not needed. Based on the information available, mitigation might also be recommended when soil vapor intrusion cannot be ruled out out.

Monitor: We recommend monitoring (sampling on a recurring basis), including but not necessarily limited to sub-slab vapor, basement air and outdoor air sampling, to determine whether concentrations in the indoor air or sub-slab vapor have changed and/or to evaluate temporal influences. Monitoring might also be recommended to determine whether existing building conditions (e.g., positive pressure heating, ventilation and air-conditioning systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined based on site-, building- and analyte-specific information, taking into account applicable environmental data and building operating conditions. Monitoring is an interim measure required to evaluate exposures related to soil vapor intrusion until contaminated environmental media are remediated.

Nitigate: We recommend mitigation to minimize current or potential exposures associated with soil vapor intrusion. The most common mitigation methods are sealing preferential pathways in conjunction with installing a sub-slab depressurization system and changing the pressurization of the building in conjunction with monitoring. The type, or combination of types, of mitigation is determined on a building-specific basis, taking into account building construction and operating conditions. Mitigation is considered a temporary measure implemented to address exposures related to soil vapor intrusion until contaminated environmental media are remediated.

These general recommendations are made with consideration being given to the additional notes on page 2.

MATRIX A Page 1 of 2



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### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### ADDITIONAL NOTES FOR MATRIX A

This matrix summarizes actions recommended to address current and potential exposures related to soil vapor intrusion. To use the matrix appropriately as a tool in the decision-making process, the following should be noted:

- [1] The matrix is generic. As such, it may be appropriate to modify a recommended action to accommodate analyte-specific, building-specific conditions (e.g., dirt floor in basement, crawl spaces, thick slabs, current occupancy, etc.), and/or factors provided in Section 3.2 of the guidance (e.g., current land use, environmental conditions, etc.). For example, collection of additional samples may be recommended when the matrix indicates "no further action" for a particular building, but the results of adjacent buildings (especially sub-slab vapor results) indicate a need to take actions to address exposures related to soil vapor intrusion. Mitigation might be recommended when the results of multiple contaminants indicate monitoring is recommended. Proactive actions may be proposed at any time. For example, the party implementing the actions may decide to install sub-slab depressurization systems on buildings where the matrix indicates "no further action" or "monitoring." Such an action might be undertaken for reasons other than public health (e.g., seeking community acceptance, reducing costs, etc.). However, actions implemented in lieu of sampling will typically be expected to be captured in the final engineering report and site management plan, and might not rule out the need for post-implementation sampling (e.g., to document effectiveness or to support terminating the action).
- [2] Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude investigating possible sources of soil vapor contamination, nor does it preclude remediating contaminated soil vapor or the source of soil vapor contamination.
- [3] Appropriate care should be taken during all aspects of sample collection to ensure that high quality data are obtained. Since the data are being used in the decision-making process, the laboratory analyzing the environmental samples must have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. Furthermore, samples should be analyzed by methods that can achieve a minimum reporting limit of 0.20 microgram per cubic meter for indoor and outdoor air samples. For sub-slab vapor samples and dirt floor soil vapor samples, a minimum reporting limit of 1 microgram per cubic meter is recommended.
- [4] Sub-slab vapor and indoor air samples are typically collected when the likelihood of soil vapor intrusion is considered to be the greatest (i.e., worst-case conditions). If samples are collected at other times (typically, samples collected outside of the heating season), then resampling during worst-case conditions might be appropriate to verify that actions taken to address exposures related to soil vapor intrusion are protective of human health.
- [5] When current exposures are attributed to sources other than soil vapor intrusion, the agencies should be given documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix box and to support agency assessment and follow-up.
- [6] The party responsible for implementing the recommended actions will differ depending upon several factors, including but not limited to the following: the identified source of the volatile chemicals, the environmental remediation program, and analyte-specific, site-specific and building-specific factors.

MATRIX A Page 2 of 2

# SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### FIGURE 2

### Soil Vapor/Indoor Air Matrix B

May 2017

Analytes Assigned:

Tetrachloroethene (PCE), 1,1,1-Trichloroethane (111-TCA), Methylene Chloride

	INDOOR AIR	CONCENTRATION of COMPOUN	ND (mcg/m³)
SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m <sup>3</sup> )	< 3	3 to < 10	10 and above
< 100	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
100 to < 1,000	4. No further action	5. MONITOR	6. MITIGATE
1,000 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

No further action: No additional actions are recommended to address human exposures.

Identify Source(s) and Resample or Mitigate: We recommend that reasonable and practical actions be taken to identify the source(s) affecting the indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. For example, if an indoor or outdoor air source is identified, we recommend the appropriate party implement actions to reduce the levels. In the event that indoor or outdoor sources are not readily identified or confirmed, resampling (which might include additional sub-slab vapor and indoor air sampling locations) is recommended to demonstrate that SVI mitigation actions are not needed. Based on the information available, mitigation might also be recommended when soil vapor intrusion cannot be ruled out.

Monitor: We recommend monitoring (sampling on a recurring basis), including but not necessarily limited to sub-slab vapor, basement air and outdoor air sampling, to determine whether concentrations in the indoor air or sub-slab vapor have changed and/or to evaluate temporal influences. Monitoring might also be recommended to determine whether existing building conditions (e.g., positive pressure heating, ventilation and air-conditioning systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined based on site-, building- and analyte-specific information, taking into account applicable environmental data and building operating conditions. Monitoring is an interim measure required to evaluate exposures related to soil vapor intrusion until contaminated environmental media are remediated.

Mitigate: We recommend mitigation to minimize current or potential exposures associated with soil vapor intrusion. The most common mitigation methods are sealing preferential pathways in conjunction with installing a sub-slab depressurization system and changing the pressurization of the building in conjunction with monitoring. The type, or combination of types, of mitigation is determined on a building-specific basis, taking into account building construction and operating conditions. Mitigation is considered a temporary measure implemented to address exposures related to soil vapor intrusion until contaminated environmental media are remediated.

These general recommendations are made with consideration being given to the additional notes on page 2.

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### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### ADDITIONAL NOTES FOR MATRIX B

This matrix summarizes actions recommended to address current and potential exposures related to soil vapor intrusion. To use the matrix appropriately as a tool in the decision-making process, the following should be noted:

- [1] The matrix is generic. As such, it may be appropriate to modify a recommended action to accommodate analyte-specific, building-specific conditions (e.g., dirt floor in basement, crawl spaces, thick slabs, current occupancy, etc.), and/or factors provided in Section 3.2 of the guidance (e.g., current land use, environmental conditions, etc.). For example, collection of additional samples may be recommended when the matrix indicates "no further action" for a particular building, but the results of adjacent buildings (especially sub-slab vapor results) indicate a need to take actions to address exposures related to soil vapor intrusion. Mitigation might be recommended when the results of multiple contaminants indicate monitoring is recommended. Proactive actions may be proposed at any time. For example, the party implementing the actions may decide to install sub-slab depressurization systems on buildings where the matrix indicates "no further action" or "monitoring." Such an action might be undertaken for reasons other than public health (e.g., seeking community acceptance, reducing costs, etc.). However, actions implemented in lieu of sampling will typically be expected to be captured in the final engineering report and site management plan, and might not rule out the need for post-implementation sampling (e.g., to document effectiveness or to support terminating the action).
- [2] Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude investigating possible sources of soil vapor contamination, nor does it preclude remediating contaminated soil vapor or the source of soil vapor contamination.
- [3] Appropriate care should be taken during all aspects of sample collection to ensure that high quality data are obtained. Since the data are being used in the decision-making process, the laboratory analyzing the environmental samples must have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. Furthermore, samples should be analyzed by methods that can achieve a minimum reporting limit of 1 microgram per cubic meter for indoor and outdoor air samples. For sub-slab vapor samples and dirt floor soil vapor samples, a minimum reporting limit of 1 microgram per cubic meter.
- [4] Sub-slab vapor and indoor air samples are typically collected when the likelihood of soil vapor intrusion is considered to be the greatest (i.e., worst-case conditions). If samples are collected at other times (typically, samples collected outside of the heating season), then resampling during worst-case conditions might be appropriate to verify that actions taken to address exposures related to soil vapor intrusion are protective of human health.
- [5] When current exposures are attributed to sources other than soil vapor intrusion, the agencies should be given documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix box and to support agency assessment and follow-up.
- [6] The party responsible for implementing the recommended actions will differ depending upon several factors, including but not limited to the following: the identified source of the volatile chemicals, the environmental remediation program, and analyte-specific, site-specific and building-specific factors.

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## SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### FIGURE 3

#### Soil Vapor/Indoor Air Matrix C

May 2017

Analytes Assigned: Vinyl Chloride

	INDOOR AIR CONCENTRATIO	N of COMPOUND (mcg/m <sup>3</sup> )
SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m <sup>3</sup> )	< 0.2	0.2 and above
< 6	1. No further action	2. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
6 to < 60	3. MONITOR	4. MITIGATE
60 and above	5. MITIGATE	6. MITIGATE

No further action: No additional actions are recommended to address human exposures.

Identify Source(s) and Resample or Mitigate: We recommend that reasonable and practical actions be taken to identify the source(s) affecting the indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. For example, if an indoor or outdoor air source is identified, we recommend the appropriate party implement actions to reduce the levels. In the event that indoor or outdoor sources are not readily identified or confirmed, resampling (which might include additional sub-slab vapor and indoor air sampling locations) is recommended to demonstrate that SVI mitigation actions are not needed. Based on the information available, mitigation might also be recommended when soil vapor intrusion cannot be ruled out.

Monitor: We recommend monitoring (sampling on a recurring basis), including but not necessarily limited to sub-slab vapor, basement air and outdoor air sampling, to determine whether concentrations in the indoor air or sub-slab vapor have changed and/or to evaluate temporal influences. Monitoring might also be recommended to determine whether existing building conditions (e.g., positive pressure heating, ventilation and air-conditioning systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined based on site-, building- and analyte-specific information, taking into account applicable environmental data and building operating conditions. Monitoring is an interim measure required to evaluate exposures related to soil vapor intrusion until contaminated environmental media are remediated.

Nitigate: We recommend mitigation to minimize current or potential exposures associated with soil vapor intrusion. The most common mitigation methods are sealing preferential pathways in conjunction with installing a sub-slab depressurization system and changing the pressurization of the building in conjunction with monitoring. The type, or combination of types, of mitigation is determined on a building-specific basis, taking into account building construction and operating conditions. Mitigation is considered a temporary measure implemented to address exposures related to soil vapor intrusion until contaminated environmental media are remediated.

These general recommendations are made with consideration being given to the additional notes on page 2.

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### SOIL VAPOR SAMPLE COLLECTION PROCEDURE

#### ADDITIONAL NOTES FOR MATRIX C

This matrix summarizes actions recommended to address current and potential exposures related to soil vapor intrusion. To use the matrix appropriately as a tool in the decision-making process, the following should be noted:

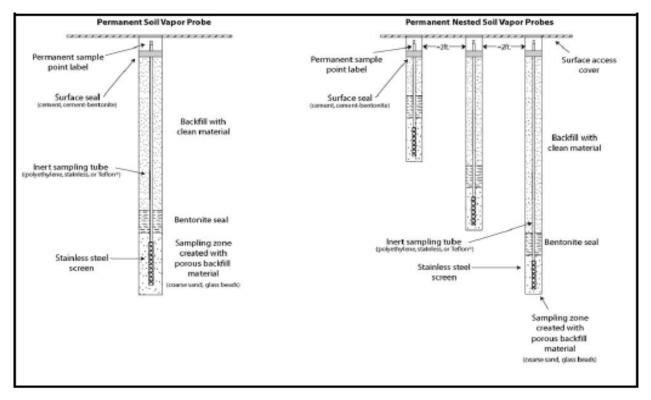
- [1] The matrix is generic. As such, it may be appropriate to modify a recommended action to accommodate analyte-specific, building-specific conditions (e.g., dirt floor in basement, crawl spaces, thick slabs, current occupancy, etc.), and/or factors provided in Section 3.2 of the guidance (e.g., current land use, environmental conditions, etc.). For example, collection of additional samples may be recommended when the matrix indicates "no further action" for a particular building, but the results of adjacent buildings (especially sub-slab vapor results) indicate a need to take actions to address exposures related to soil vapor intrusion. Mitigation might be recommended when the results of multiple contaminants indicate monitoring is recommended. Proactive actions may be proposed at any time. For example, the party implementing the actions may decide to install sub-slab depressurization systems on buildings where the matrix indicates "no further action" or "monitoring." Such an action might be undertaken for reasons other than public health (e.g., seeking community acceptance, reducing costs, etc.). However, actions implemented in lieu of sampling will typically be expected to be captured in the final engineering report and site management plan, and might not rule out the need for post-implementation sampling (e.g., to document effectiveness or to support terminating the action).
- [2] Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude investigating possible sources of soil vapor contamination, nor does it preclude remediating contaminated soil vapor or the source of soil vapor contamination.
- [3] Appropriate care should be taken during all aspects of sample collection to ensure that high quality data are obtained. Since the data are being used in the decision-making process, the laboratory analyzing the environmental samples must have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. Furthermore, samples should be analyzed by methods that can achieve a minimum reporting limit of 0.20 microgram per cubic meter for indoor and outdoor air samples. For sub-slab vapor samples and dirt floor soil vapor samples, a minimum reporting limit of 1 microgram per cubic meter is recommended.
- [4] Sub-slab vapor and indoor air samples are typically collected when the likelihood of soil vapor intrusion is considered to be the greatest (i.e., worst-case conditions). If samples are collected at other times (typically, samples collected outside of the heating season), then resampling during worst-case conditions might be appropriate to verify that actions taken to address exposures related to soil vapor intrusion are protective of human health.
- [5] When current exposures are attributed to sources other than soil vapor intrusion, the agencies should be given documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix box and to support agency assessment and follow-up.
- [6] The party responsible for implementing the recommended actions will differ depending upon several factors, including but not limited to the following: the identified source of the volatile chemicals, the environmental remediation program, and analyte-specific, site-specific and building-specific factors.

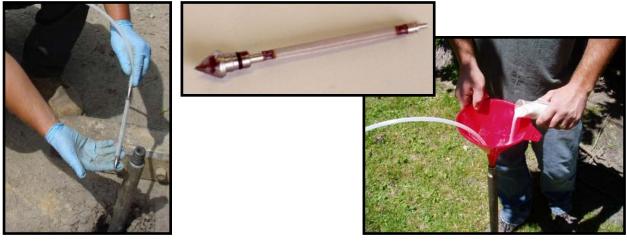
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# SOIL VAPOR SAMPLE COLLECTION PROCEDURE

# FIGURE 4

Schematics of a permanent soil vapor probe and permanent nested soil vapor probes





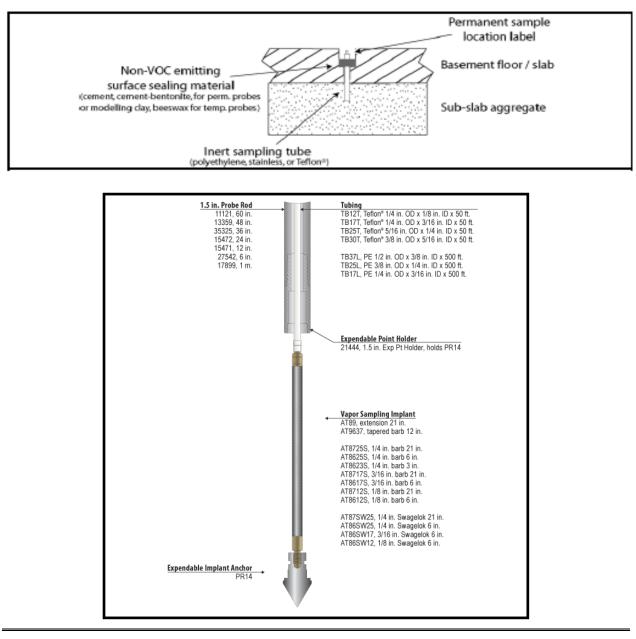


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# SOIL VAPOR SAMPLE COLLECTION PROCEDURE

### FIGURE 5

Schematic of a sub-slab vapor probe



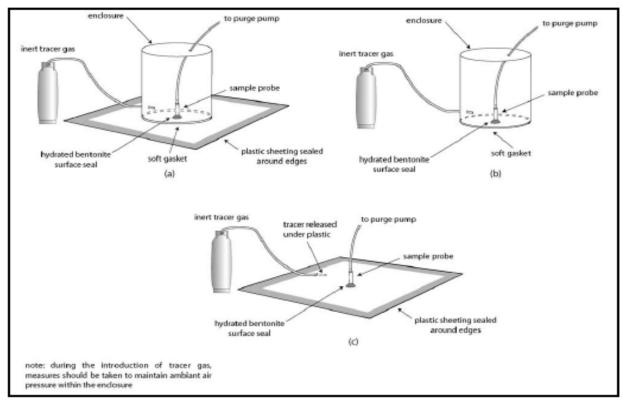


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# SOIL VAPOR SAMPLE COLLECTION PROCEDURE

# FIGURE 6

Schematics of tracer gas applications







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# SOIL VAPOR SAMPLE COLLECTION PROCEDURE

ENVIRONMENTAL ENGINEERING & Science, PLLC	AIR CANISTER FIELD RECORD
PROJECT INFORMATION:	
Project:	SAMPLE I.D.:
Job No:	
Location:	
Field Staff:	
Client:	
	Size of Carister:
WEATHER CONDITIONS:	Canister Serial No.:
Ambient Air Temp A.M.:	Flow Controller No
Ambient Air Temp P.M.:	Sample Date(s)
Wind Direction:	Shipping Date:
Wind Speed:	Sample Type
Precipitation:	
	Soil Cas Probe Depth
FIELD SAMPLING INFORMATION:	
	(inches Hg)
	SURF (psig) DATE INITIALS
Lab Vacuum (on tag)	
Field Vacuum Check <sup>1</sup>	
Initial Field Vacuum <sup>2</sup>	
Final Field Vacuum <sup>3</sup>	
Duration of Sample Collection	
LABORATORY CANISTER PRESSURIZATION:	
Initial Viscuum (incluse He and point)	
Initial Vacuum (inches Hg and psia)	
Final Fressure (psia)	
Final Fressure (ps/a) Pressulization Cas	
Final Fressure (ps/a) Pressultation Gas SUBSLAB STIRGOD:	COMPOSITE FLOW RATE RANGE TIME (hours) (ml/min)
Final Fressure (ps/a)       Pressurzation Gas       SUBSLAB SHROUD:       Shroud Helium Concentration	TIME (hours) (ml/min)
Final Fressure (ps/a)         Pressure (ps/a)         Substance         Shroud Helium Concentration         Calculated tubing volume       x 3 =	TIME (hours)         (ml/min)           15 Min.         316 - 333
Final Fressure (rs.a)         Pressure (rs.a)         Pressure (rs.a)         Substance         Shroud Helium Concentration         Calculated tubing volume         x 3 =         Purged Tubing Volume Concentration:	TIME (hours)         (ml/min)           15 Min.         316 - 333           0.5 Hours         158 - 166.7
Final Fressure (ps/a)         Pressure (ps/a)         Substance         Shroud Helium Concentration         Calculated tubing volume       x 3 =	TIME (hours)         (ml/min)           15 Min.         316 - 333           0.5 Hours         158 - 166.7
Final Fressure (rs.a)         Pressure (rs.a)         Pressure (rs.a)         Substance         Shroud Helium Concentration         Calculated tubing volume         x 3 =         Purged Tubing Volume Concentration:	TIME (hours)         (ml/min)           15 Min.         316 - 333           0.5 Hours         158 - 166.7           1         79.2 - 83.3           2         39.6 - 41.7
Final Fressure (rs.a)         Pressure (rs.a)         Pressure (rs.a)         Substance         Shroud Helium Concentration         Calculated tubing volume         x 3 =         Purged Tubing Volume Concentration:	TIME (hours)         (ml/min)           15 Min.         316 - 333           0.5 Hours         158 - 166.7           1         79.2 - 83.3           2         39.6 - 41.7           4         19.8 - 20.8
Final Fressure (sca)         Pressult ation Gas         SUBSLAB STREEDE:         Shroud Helium Concentration         Calculated tubing volume         Calculated tubing Volume Concentration:         Is the purged Volume concentration         Is the purged volume concentration less than or equal to 10% in shroud?	TIME (hours)         (ml/min)           15 Min.         316 - 333           0.5 Hours         158 - 166.7           1         79.2 - 83.3           2         39.6 - 41.7           4         19.8 - 20.8           6         13.2 - 13.9
Final Fressure (rs.a)         Pressure (rs.a)         Pressure (rs.a)         Substance         Shroud Helium Concentration         Calculated tubing volume         x 3 =         Purged Tubing Volume Concentration:	TIME (hours)         (ml/min)           15 Min.         316 - 333           0.5 Hours         158 - 166.7           1         79.2 - 83.3           2         39.6 - 41.7           4         19.8 - 20.8           6         13.2 - 13.9           8         9.9 - 10.4
Final Fressure (sca)         Pressult ation cas         Substant Street         Shroud Helium Concentration         Calculated tubing volume         Calculated tubing volume Concentration:         Is the purged volume concentration         Is the purged volume concentration less than or equal to 10% in shroud?         Image: Concentration less than or equal to 10% in shroud?         Image: Concentration less than or equal to 10% in shroud?	TIME (hours)         (ml/min)           15 Min.         316 - 333           0.5 Hours         158 - 166.7           1         79.2 - 83.3           2         39.6 - 41.7           4         19.8 - 20.8           6         13.2 - 13.9



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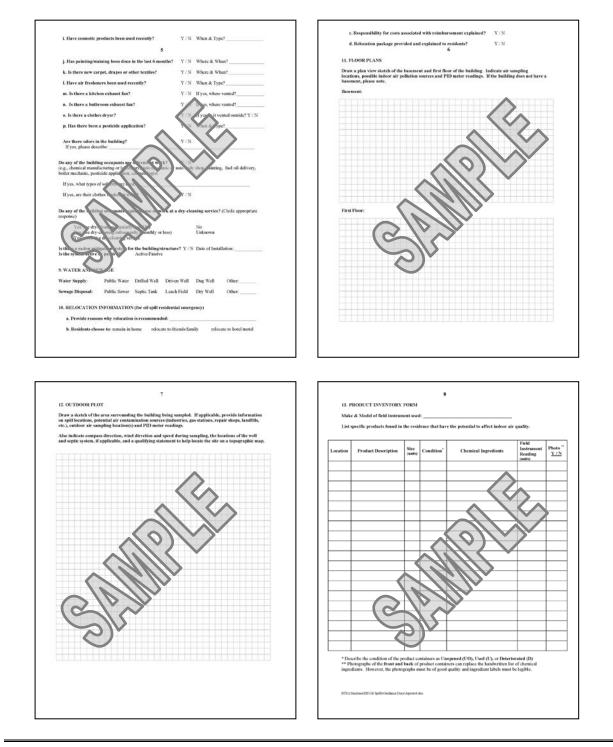
# SOIL VAPOR SAMPLE COLLECTION PROCEDURE





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# SOIL VAPOR SAMPLE COLLECTION PROCEDURE





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