Groundwater Study at Long Island Mines
Work Plan
JUNE 2022

Kathy Hochul, Governor | Basil Seggos, Commissioner
Groundwater Study at Long Island Mines Work Plan

Mission of the Division of Mineral Resources – Mined Land Reclamation Program

To provide for the reclamation of affected lands to a productive use, prevent pollution, protect and perpetuate the taxable value of property, and protect the health, safety, and general welfare of the people, as well as the natural beauty and aesthetic values in the affected areas of the state.

Acknowledgements

This document was prepared by:

New York State Department of Environmental Conservation

in consultation with

New York State Department of Health
Table of Contents

Groundwater Study at Long Island Mines Work Plan ................................................................. 1
   Mission of the Division of Mineral Resources – Mined Land Reclamation Program .............. 1
      • Acknowledgements ......................................................................................................... 1

EXECUTIVE SUMMARY .................................................................................................................. 4

PROJECT BACKGROUND AND DESCRIPTION .............................................................................. 5
   Study Purpose .......................................................................................................................... 5
   Regulatory Framework .............................................................................................................. 5
   Hydrogeological Setting .......................................................................................................... 6
   Permitted Mines and Groundwater Monitoring .................................................................... 6
   Involved Parties ....................................................................................................................... 6

PROJECT SCOPE ................................................................................................................................ 7
   Overview .................................................................................................................................. 7
   Literature Review of Existing Long Island Groundwater Data ................................................. 7
   Participating Mines .................................................................................................................. 7
   Groundwater Monitoring Program .......................................................................................... 7
      • Well Surveying and Water Level Monitoring Procedure .................................................. 7
      • Groundwater Sample Collection Procedures .................................................................. 8
      • Well Maintenance .......................................................................................................... 9
      • Groundwater Analysis, Sample Frequency & Monitoring Locations .............................. 9
      • Table 1: Compounds of Interest, Sampling Frequency and Well Locations ................... 10
      • Field & Laboratory Quality Assurance / Quality Control ................................................. 10
   Analytical Methods and Reporting Limits .............................................................................. 11
   Coordination and Oversight ................................................................................................... 11
   Laboratory Deliverables ......................................................................................................... 11
   Quarterly Reporting Requirements (Participating Mines) ....................................................... 11
   Report and Final Deliverable (DEC) ....................................................................................... 12

ANTICIPATED TIMELINE/SCHEDULE ............................................................................................ 13
   Tentative Phase Schedule ...................................................................................................... 13

Figure 1. Location map of Long Island (DEC Region 1) .............................................................. 14

Figure 2. Hydrogeologic Units, Long Island ............................................................................. 15

Figure 3. Map showing DEC Region 1 Mines ........................................................................ 16


Appendix 2. Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC’s Part 375 Remedial Programs ......................................................... 24

Appendix 4. List of Compounds of Interest with Methods of Analysis and Specified Reporting Limits .......................................................................................................................................................... 95
EXECUTIVE SUMMARY

The New York State Department of Environmental Conservation (DEC), in consultation with the New York State Department of Health, prepared this work plan to study the potential impact to groundwater quality from sand and gravel mining on Long Island. Over at least three years, the study will allow DEC to capture any seasonal changes in groundwater quality. Participating operators will consistently follow the specific groundwater monitoring and reporting procedures in this work plan, including using best practices throughout the study period, to ensure results are comparable between years and sites. At the conclusion of the study, DEC will summarize the results and provide recommendations to ensure protection of Long Island’s sole source aquifer.
PROJECT BACKGROUND AND DESCRIPTION

Study Purpose

On December 15, 2020, the governor directed New York State Department of Environmental Conservation (DEC), in consultation with the New York State Department of Health (DOH), to study the potential for impacts to groundwater quality resulting from sand mining on Long Island.

Regulatory Framework

Mining has a long history in New York State. Sand and gravel from Long Island have been used for more than a century to provide basic materials to develop and maintain infrastructure for the local area and New York City. Prior to the Mined Land Reclamation Law (MLRL) going into effect on April 1, 1975, mining in New York was mostly unregulated with a patchwork of inconsistent approaches.

The MLRL states that any person who mines or proposes to mine more than 1,000 tons or 750 cubic yards, whichever is less, of minerals from the earth within 12 successive calendar months shall not engage in such mining unless a permit for such mining operation has been obtained from DEC. Towns can determine where proposed new mining is permissible through their zoning laws and ordinances. DEC will issue a mining permit after conducting a technical review and determining that the mining operation will comply with applicable statutory and regulatory requirements, including the State Environmental Quality Review Act, as appropriate. A complete application for a new mining permit consists of completed application forms, a mined land-use plan, a statement by the applicant that mining is not prohibited at that location, and such additional information as the DEC may require. For new mine applications in DEC Region 1 (i.e., Nassau and Suffolk counties), the SEQR Coordination letter inquires as to whether local zoning ordinances prohibit mining uses at the location proposed for mining. In these cases, DEC relies solely on the determination made by the municipality’s Chief Administrative Officer on whether mining is a permissible land use at the proposed location. If the Chief Administrative Officer determines mining is not permissible at the proposed location, the application is incomplete, and DEC will notify the applicant that processing cannot advance until the local prohibition is removed. Additionally, in Region 1, towns may enact local laws or ordinances requiring the monitoring of groundwater impacts resulting from mining.

As part of the DEC’s review of a mining application for a mine not previously permitted, DEC determines the accuracy of materials submitted in the application, assesses impacts of the project on the environment in the immediate and surrounding areas, and determines whether the project satisfies applicable permitting standards. If the application is determined to be complete, DEC publishes a notice of complete application. The notice provides a period during which the public may provide comments on the project. The Chief Administrative Officer of the local government may make a determination, and notify the DEC and applicant, in regard to: (i) appropriate setbacks from property boundaries or public thoroughfare rights-of-way; (ii) manmade or natural barriers designed to restrict access if needed, and, if affirmative, the type, length, height and location thereof; (iii) the control of dust; (iv) hours of operation; and (v) whether mining is prohibited at that location.

DEC makes a final decision on the application by either issuing a permit with conditions or denying the application with an explanation for the denial. If a permit is issued, the permittee, with the exception of municipally operated mines, is required to provide financial security for the reclamation of the mine prior to permit issuance in an amount determined by DEC pursuant to regulation to ensure proper reclamation of the site.
**Hydrogeological Setting**

Long Island is a densely populated island in the southeastern part of New York State (Figure 1). In Nassau and Suffolk counties, groundwater is the only source of freshwater to supply drinking water to nearly three million residents. Given the importance of this resource and lack of alternative freshwater supplies, the U.S. Environmental Protection Agency (EPA) has designated the groundwater on Long Island as a sole source aquifer.

The aquifer system on Long Island consists of deposits of unconsolidated materials including clay, silt, sand, and gravel. These sediments are grouped by the United States Geological Survey (USGS) into five principal aquifers based on age, water-transmitting properties, and depositional environment: Upper Glacial; North Shore; Jameco; Magothy; and Lloyd (Figure 2). The aquifer system also contains in some areas extensive and thick clay layers that act as confining units. Confining units typically isolate the underlying layers of freshwater zones, limit recharge rates due to lower permeability, and help to protect lower freshwater zones from surface contamination.

The Upper Glacial aquifer, dominated by sediments of coarse sand and gravel, is of economic interest to mine operators. The Upper Glacial aquifer is connected to surface water on Long Island and in some areas serves as a source of drinking water. Although a majority of the drinking water supplied to the public is sourced from the underlying Magothy aquifer, far below where mining activities occur, the aquifers are connected via groundwater moving from the Upper Glacial aquifer down into the Magothy aquifer.

**Permitted Mines and Groundwater Monitoring**

DEC requires sand and gravel mines to obtain a permit for mines that exceed the regulatory threshold for the reasons stated in the Regulatory Framework. To protect the sole source aquifer of Long Island, prior to approving mining activities into the groundwater table, the mine owner is required to perform a hydrogeological investigation that assesses existing conditions and the potential environmental impact on groundwater quality and quantity.

DEC Region 1 currently has 23 mines that are subject to the jurisdiction of the MLRL (Figure 3). Of the 23 mines, seven mines are permitted to mine into the groundwater table and two mines have a pending application to mine into the groundwater table that is currently under DEC review.

Several mines are required by the mining permit to submit groundwater monitoring data to DEC on a quarterly or semi-annual basis. These requirements typically include sampling groundwater for analysis of various chemicals, such as volatile organic compounds (VOCs) and metals, and water-level monitoring. While other mines may collect groundwater data or have monitoring wells installed at the site to gather baseline conditions, these mines are not required to submit data to DEC. For the purposes of this study, all participating mine sites will follow one consistent approach as specified by DEC and will analyze samples collected for a specified list of compounds of interest at the same frequency.

**Involved Parties**

DEC is undertaking the study in consultation with DOH and participation from the regulated community. During June and July 2021, DEC with participation from DOH hosted a series of stakeholder meetings with water districts, elected officials, environmental groups, and the regulated community and held a virtual public meeting to receive and incorporate input prior to the development of the study.
PROJECT SCOPE

Overview

The groundwater study (study) will consist of an assessment of groundwater quality surrounding participating mines on Long Island and an evaluation of whether mining sand and gravel impacts groundwater quality. The study will include at least three years of data, beginning in late summer 2022. Participating mines will monitor groundwater by collecting and analyzing samples for a specific list of compounds of interest each quarter over the three-year period. DEC will review the data as it is collected and submitted to DEC. During this period, DEC will consider if any additional monitoring beyond the initial three years is necessary due to unexpected results or events. Upon the completion of the three-year study, DEC will prepare a report on the study. The final report will evaluate the groundwater data from participating mines and compare those results against background conditions.

Literature Review of Existing Long Island Groundwater Data

DEC will conduct a literature review and compile available data for background groundwater quality and geochemistry of Long Island’s sole source aquifer. Based on the results of the review, background conditions of the sole source aquifer will be developed. The background conditions will be used to compare collected and analyzed groundwater data obtained during the course of the study.

Participating Mines

DEC anticipates that approximately six to ten mines will participate in the study. Participating mine sites will be required to perform the groundwater monitoring as outlined below.

Groundwater Monitoring Program

DEC is proposing to perform a comprehensive groundwater monitoring program as part of the study. To ensure data are consistently obtained, a standard approach for data collection and quality control/assurance procedures must be followed by participating mines. The procedures are outlined below.

Well Surveying and Water Level Monitoring Procedure

If not already done, a professional survey of all existing monitoring wells is required. The survey must include the well location expressed as longitude and latitude coordinates of all monitoring wells, which must be reported in decimal degrees relative to World Geodetic System of 1984. The survey must also include information about the monitoring well top of casing and surface elevation relative to a specific vertical datum (e.g., NAVD88) or, less preferably, an arbitrary datum. A resurvey is required for any well that has been repaired or replaced prior to groundwater monitoring.

On a quarterly basis, prior to sampling, participating mines will collect synoptic groundwater elevations at all monitoring wells. At each monitoring well a water level probe shall be used to determine the depth to water (DTW) and the current well depth to bottom (DTB). All measurements shall be collected from a consistent point on the well casing (point marked on the well casing) and reported in units of feet. Typically, DTW and DTB measurements are taken from the north side of the well casing and recorded to the nearest hundredth foot.

Note: If it is determined that the well screen is occluded due to accumulation of silt or finer-sand material, the monitoring well should be developed at least one week before the planned sampling activities.
Groundwater Sample Collection Procedures

Upon completion of gathering synoptic water level measurements, groundwater sampling will be performed. Detailed procedures and recommendations herein regarding sample collection are based on the Summary of Sampling Instructions contained in *U.S. Environmental Protection Agency guidance document Low stress (low flow) purging and sampling procedure for the collection of groundwater samples from monitoring wells* (July 30, 1996 and revised on September 19, 2017), pp.25-30 (Appendix 1).

A summary of the general groundwater sampling requirements is outlined below:

- To ensure groundwater quality information is accurate, all field instrumentation must be calibrated daily in accordance with manufacturer recommendations. Further, if field readings are substantially different from previous readings or inconsistent with general expectations, the equipment must be tested and, if necessary, re-calibrated.

- To ensure samples to be analyzed are representative of aquifer conditions, groundwater samples must be obtained using low-flow sampling methods. Low-flow sampling procedures generally require:
  - Using reduced flow rates to limit disturbance of sediments that might bias results. Monitoring water levels during purging should confirm that there is less than 0.3 feet of water level changes.
  - Collecting field parameters (Dissolved Oxygen, Temperature, pH, Oxidation/Reduction Potential, Specific Conductivity, Turbidity) during purging to ensure sample being collected is representative of aquifer by achieving stabilization criteria. Stabilization criteria are defined in Appendix 1.
  - Achievement of turbidity levels of less than 5 NTUs, and stable drawdowns of less than 0.3 feet, while desirable, are not mandatory. Sampling may still take place provided the indicator field parameter stabilization criteria in this procedure are met. If after 2 hours of purging indicator field parameters have not stabilized, purging can be terminated, and groundwater sampling can commence. Field notes should document the attempts that were made to achieve field stabilization (e.g., lowering pumping rates, raising or lowering the pump intake, etc.).
  - For metals (inorganics) analyses, regardless of the turbidity conditions, dissolved and total analyses is being requested. Therefore, field (preferred) or laboratory filtering is required using a 0.45-micron filter.
  - Decontaminating equipment before and after use at each monitoring well.

- The field sampling staff must document all field work in a logbook and field forms.

**Note on Radionuclides Sampling Procedure:** Groundwater samples for select radionuclides for analysis (Groundwater Analysis, Sample Frequency & Monitoring Locations) should be collected using low-flow sampling procedures with analysis of an unfiltered sample. However, if low-flow sampling results in turbidity levels exceeding 50 nephelometric turbidity units (NTUs) at a specific monitoring well, DEC recommends field or lab filtering prior to analysis to obtain a representative groundwater concentration. Typically, a 0.45-micron filter is used to filter groundwater samples when there are elevated turbidity readings despite application of low-flow sampling methods. Also, when reporting the results for radionuclides, the full laboratory report (Category B Deliverable) must be provided, which typically includes an uncertainty analysis critical to data evaluation.
Note on Per- and Polyfluoroalkyl Substances (PFAS) Sampling Procedures: As part of this effort, the workplan includes sampling for PFAS (Groundwater Analysis, Sample Frequency & Monitoring Locations). Groundwater sampling activities should be performed consistent with current best practices or, at a minimum, in conformance with the latest DEC sampling requirements, see Appendix 2.

Well Maintenance

Consistent with existing permit requirements, all monitoring wells must be secured, maintained and accessible. If an existing well is damaged or inaccessible, the well must be repaired or replaced. If a well is damaged beyond repair, the well must be abandoned in accordance with the DEC Policy CP 43: Groundwater Monitoring Well Decommissioning Procedures (November 3, 2008) (Appendix 3).

Groundwater Analysis, Sample Frequency & Monitoring Locations

Groundwater samples will be analyzed for a range of compounds based on historic and current activities associated with mining activities. These compounds of interest are also typically analyzed as part of site characterization activities undertaken by the DEC Division of Environmental Remediation.

Specifically, DEC requires two baseline sample rounds for Volatile Organic Compounds (VOCs), semi-Volatile Organic Compounds (SVOCs), Polychlorinated Biphenyls (PCBs), herbicides, pesticides, Target Analyte List (TAL) total and dissolved metals, and Anions/Cations. The baseline sampling would occur as part of the first and second quarterly sampling events. After the baseline sampling events are complete, DEC requires routine quarterly sampling of VOCs, SVOCs, TAL total and dissolved metals, and Anions/Cations for three years.

DEC in consultation with DOH requires that study participants collect groundwater samples for analysis of additional chemicals of interest including 1,4-Dioxane, per- and polyfluoroalkyl substances (PFAS), and select radionuclides. For these compounds, DEC requires two consecutive rounds of groundwater sampling at two hydraulically upgradient and two hydraulically downgradient monitoring wells as part of the study.
### Table 1: Compounds of Interest, Sampling Frequency and Well Locations

<table>
<thead>
<tr>
<th>Compound of Interest</th>
<th>Frequency of Sampling</th>
<th>Number of Monitoring Wells</th>
</tr>
</thead>
<tbody>
<tr>
<td>Volatile Organic Compounds (VOCs)</td>
<td>Quarterly for 3 Years.</td>
<td>All available monitoring wells.</td>
</tr>
<tr>
<td>Semi-VOCs (SVOCs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Target Analyte List (TAL) Metals, Total and Dissolved.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cation/Anions: Ammonium, Chloride, Bromide, Nitrate, Nitrite, Total Nitrogen, Sulfide, Sulfate, Phosphate, Iodide, Carbonate, Bi-Carbonate, Fluoride</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Dissolved Solids (TDS)*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Polychlorinated Biphenyls (PCBs)</td>
<td>First two quarters of sampling as part of baseline evaluation.</td>
<td>All available monitoring wells.</td>
</tr>
<tr>
<td>Pesticides</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Herbicides</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Isotopic Uranium and Thorium</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Radium 226/ 228</td>
<td>Two consecutive quarters of sampling as directed by DEC.</td>
<td>2 hydraulically upgradient and 2 hydraulically downgradient monitoring wells. Well locations will be selected by DEC staff during a coordination meeting.</td>
</tr>
<tr>
<td>Per- and Polyfluoroalkyl Substances (PFAS)**</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1,4-Dioxane</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Note:**
*Use Method SM 2540C for Total Dissolved Solids analysis.

**For PFAS, the method of analysis and list of compounds to be analyzed may change based on updated guidance from the Division of Environmental Remediation. Please refer to Appendix 4 for a specific list of compounds to be analyzed for each group of compounds and specific analysis methods. Please refer to Appendix 2 for PFAS analysis.

**Field & Laboratory Quality Assurance / Quality Control**

Quality Assurance/Quality Control (QA/QC) samples should be collected for each groundwater sampling event. A trip blank is required per cooler for VOCs only. Field blanks, duplicates, and matrix/matrix-spike duplicates are required at the frequency of 1 per 20 samples. Rinsate blanks will also be required at the rate of 1 per 20 samples if non-dedicated equipment is used. When sampling for PFAS, one equipment blank per site per sampling event should be collected. After sample collection all groundwater samples will be placed on ice and shipped under chain of custody to an approved analytical laboratory.
Analytical Methods and Reporting Limits

All samples collected during the study will be analyzed using specified analytical methods. Appendix 4 lists the proposed analytical method for each compound of interest. If no specific method is proposed, then the most current method available must be utilized. The reporting limits for all compounds to be analyzed must either the lowest possible reporting limit or at minimum, those specified in Appendix 4. If the reporting limits cannot be achieved, DEC must be notified.

Coordination and Oversight

All sampling of wells will be completed by an environmental consultant that is certified to provide geological or engineering services in the State of New York. Further, DEC recommends that field staff for the environmental consultants are sufficiently experienced and qualified to perform the work outlined herein.

To ensure all participants are familiar with the sampling requirements, address site-specific concerns, and review expectations for the groundwater study, DEC proposes to hold a pre-mobilization meeting with all personnel involved in sampling at participating mines.

Further, DEC will observe sampling events, to ensure sampling methods and procedures are being performed in accordance with this workplan.

Laboratory Deliverables

All sample analyses must be performed by a New York State Environmental Laboratory Approval Program (ELAP) certified analytical laboratory. Participating mine operators should request a standard 10-day turn-around time for results to be provided by the certified laboratory. Participating mines must also request Category B data deliverables from the laboratory.

Quarterly Reporting Requirements (Participating Mines)

DEC will require participating mines to submit all relevant data via an Electronic Data Deliverable (EDD) as further described below. In addition to EDD submission, participating mines must provide copies of field forms and field notes. Items of interest include low-flow groundwater sampling forms and equipment calibration records. All notes and field forms provided must be legible. All required data must be submitted within 45 days of completion of field work.

The EDD should contain the following information:

- As part of an initial submission, and if not already provided, well survey data (including well coordinates in decimal degrees, casing elevations, etc.) and well construction data (e.g., screen material type, depths, etc.),
- Analytical data provided by the laboratory,
- Synoptic water level data for each sampling event and,
- Field parameters (e.g., dissolved oxygen, temperature, pH, turbidity, etc.).

Specific requirements for providing EDDs for analytical data, well survey, water levels, etc., can be found at DEC’s website (https://www.dec.ny.gov/chemical/62440.html).
Please note that all data provided as part of the EDD must be checked for accuracy and submitted by a person certified to perform geological or engineering services in the State of New York.

Report and Final Deliverable (DEC)

Upon completion of the three-year study, DEC will prepare a report, which will include site maps for each participating site, a summary of field work performed, data collected, summary data tables, and analytical results. The report will be available to the public and stakeholders. The findings of the study will be provided to the public and stakeholders during a public hearing. DEC will finalize the report after the public hearing.

The report will, among other things, consider the quality of the data gathered, compare the data to available background data, review the data for any potential trends, and evaluate the potential impact of sand and gravel mining on groundwater quality. DEC will also provide recommendations and initiate permit condition adjustments as needed, based on the study results, to ensure that existing permit and monitoring requirements are protective of Long Island’s sole source aquifer.
## ANTICIPATED TIMELINE/SCHEDULE

### Tentative Phase Schedule

- **Phase A** – Finalize Scope/Work Plan: finalized Q1 2022
- **Phase B** – Pre-Mobilization Meetings Prior to Sampling Events at Participating Mines Q3 2022
- **Phase C** – Quarterly Sampling by participating mines and routine DEC review of sampling results: Q3 2022 through Q2 2025
- **Phase D** – Report Generation: Q3 2023 through Q4 2025
- **Phase E** – Report Release and Public Hearing: Q1/Q2 2026
- **Phase F** – Final Report Release: Q3/Q4 2026
Figure 1. Location map of Long Island (DEC Region 1)
Figure 2. Hydrogeologic Units, Long Island

Figure 3. Map showing DEC Region 1 Mines
APPENDIX B

SUMMARY OF SAMPLING INSTRUCTIONS

These instructions are for using an adjustable rate, submersible pump or a peristaltic pump with the pump’s intake placed at the midpoint of a 10 foot or less well screen or an open interval. The water level in the monitoring well is above the top of the well screen or open interval, the ambient temperature is above 32°F, and the equipment is not dedicated. Field instruments are already calibrated. The equipment is setup according to the diagram at the end of these instructions.

1. Review well installation information. Record well depth, length of screen or open interval, and depth to top of the well screen. Determine the pump’s intake depth (e.g., mid-point of screen/open interval).

2. On the day of sampling, check security of the well casing, perform any safety checks needed for the site, lay out a sheet of polyethylene around the well (if necessary), and setup the equipment. If necessary a canopy or an equivalent item can be setup to shade the pump’s tubing and flow-through-cell from the sun light to prevent the sun light from heating the groundwater.

3. Check well casing for a reference mark. If missing, make a reference mark. Measure the water level (initial) to 0.01 ft. and record this information.

4. Install the pump’s intake to the appropriate depth (e.g., midpoint) of the well screen or open interval. Do not turn-on the pump at this time.

5. Measure water level and record this information.

6. Turn-on the pump and discharge the groundwater into a graduated waste bucket. Slowly increase the flow rate until the water level starts to drop. Reduce the flow rate slightly so the water level stabilizes. Record the pump’s settings. Calculate the flow rate using a graduated container and a stop watch. Record the flow rate. Do not let the water level drop below the top of the well screen.

If the groundwater is highly turbid or discolored, continue to discharge the water into the bucket until the water clears (visual observation); this usually takes a few minutes. The turbid or discolored water is usually from the well-being disturbed during the pump installation. If the water does not clear, then you need to make a choice whether to continue purging the well (hoping that it will clear after a reasonable time) or continue to
the next step. Note, it is sometimes helpful to install the pump the day before the sampling event so that the disturbed materials in the well can settle out.

If the water level drops to the top of the well screen during the purging of the well, stop purging the well, and do the following:

Wait for the well to recharge to a sufficient volume so samples can be collected. This may take a while (pump may be removed from well, if turbidity is not a problem). The project manager will need to make the decision when samples should be collected and the reasons recorded in the site’s log book. A water level measurement needs to be performed and recorded before samples are collected. When samples are being collected, the water level must not drop below the top of the screen or open interval. Collect the samples from the pump’s tubing. Always collect the VOCs and dissolved gases samples first. Normally, the samples requiring a small volume are collected before the large volume samples are collected just in case there is not sufficient water in the well to fill all the sample containers. All samples must be collected, preserved, and stored according to the analytical method. Remove the pump from the well and decontaminate the sampling equipment.

If the water level has dropped 0.3 feet or less from the initial water level (water level measure before the pump was installed); proceed to Step 7. If the water level has dropped more than 0.3 feet, calculate the volume of water between the initial water level and the stabilized water level. Add the volume of the water which occupies the pump’s tubing to this calculation. This combined volume of water needs to be purged from the well after the water level has stabilized before samples are be collected.

7. Attach the pump’s tubing to the “T” connector with a valve (or a three-way stop cock). The pump’s tubing from the well casing to the “T” connector must be as short as possible to prevent the groundwater in the tubing from heating up from the sun light or from the ambient air. Attach a short piece of tubing to the other end of the end of the “T” connector to serve as a sampling port for the turbidity samples. Attach the remaining end of the “T” connector to a short piece of tubing and connect the tubing to the flow-through-cell bottom port. To the top port, attach a small piece of tubing to direct the water into a calibrated waste bucket. Fill the cell with the groundwater and remove all gas bubbles from the cell. Position the flow-through-cell in such a way that if gas bubbles enter the cell they can easily exit the cell. If the ports are on the same side of the cell and the cell is cylindrical shape, the cell can be placed at a 45-degree angle with the ports facing upwards; this position should keep any gas bubbles entering the cell away from the monitoring probes and allow the gas bubbles to exit the cell easily (see Low-Flow Setup Diagram). Note:
make sure there are no gas bubbles caught in the probes’ protective guard; you may need to shake the cell to remove these bubbles.

8. Turn-on the monitoring probes and turbidity meter.

9. Record the temperature, pH, dissolved oxygen, specific conductance, and oxidation/reduction potential measurements. Open the valve on the “T” connector to collect a sample for the turbidity measurement, close the valve, do the measurement, and record this measurement. Calculate the pump’s flow rate from the water exiting the flow-through-cell using a graduated container and a stop watch, and record the measurement. Measure and record the water level. Check flow-through-cell for gas bubbles and sediment; if present, remove them.

10. Repeat Step 9 every 5 minutes or as appropriate until monitoring parameters stabilized. Note: at least one flow-through-cell volume must be exchanged between readings. If not, the time interval between readings will need to be increased. Stabilization is achieved when three consecutive measurements are within the following limits:

- **Turbidity** (10% for values greater than 5 NTUs; if three Turbidity values are less than 5 NTUs, consider the values as stabilized),
- **Dissolved Oxygen** (10% for values greater than 0.5 mg/L, if three Dissolved Oxygen values are less than 0.5 mg/L, consider the values as stabilized),
- **Specific Conductance** 3%,
- **Temperature** 3%,
- **pH** ± 0.1 unit,
- **Oxidation/Reduction Potential** ±10 millivolts).

If these stabilization requirements do not stabilize in a reasonable time, the probes may have been coated from the materials in the groundwater, from a buildup of sediment in the flow-through-cell, or a gas bubble is lodged in the probe. The cell and the probes will need to be cleaned. Turn-off the probes (not the pump), disconnect the cell from the “T” connector and continue to purge the well. Disassemble the cell, remove the sediment, and clean the probes according to the manufacturer’s instructions. Reassemble the cell and connect the cell to the “T” connector. Remove all gas bubbles from the cell, turn-on the probes, and continue the measurements. Record the time the cell was cleaned.

11. When it is time to collect the groundwater samples, turn-off the monitoring probes, and disconnect the pump’s tubing from the “T” connector. If you are using a centrifugal or peristaltic pump check the pump’s tubing to determine if the tubing is completely filled with water (no air space).
All samples must be collected and preserved according to the analytical method. VOCs and dissolved gases samples are normally collected first and directly into pre-preserved sample containers. However, this may not be the case for all sampling locations; the SAP/QAPP should list the order in which the samples are to be collected based on the project’s objectives). Fill all sample containers by allowing the pump discharge to flow gently down the inside of the container with minimal turbulence.

If the pump’s tubing is not completely filled with water and the samples are being collected for VOCs and/or dissolved gases analyses using a centrifugal or peristaltic pump, do the following:

All samples must be collected and preserved according to the analytical method. The VOCs and the dissolved gases (e.g., methane, ethane, ethene, and carbon dioxide) samples are collected last. When it becomes time to collect these samples increase the pump’s flow rate until the tubing is completely filled. Collect the samples and record the new flow rate.

12. Store the samples according to the analytical method.

13. Record the total purged volume (graduated waste bucket). Remove the pump from the well and decontaminate the sampling equipment.
Low-Flow Setup Diagram

- Pump Controller
- Water Level Meter
- "T" Connector With Valve
- Turbidity Sampling Port
- Groundwater Elevation
- Screen Interval
- Water Quality Meter + Flow-Through-Cell
- Ring Stand
- Graduated Waste Container

Pump Intake
## WELL PURGING-FIELD WATER QUALITY MEASUREMENTS FORM

| Location (Site/Facility Name) | Depth to ______/_______ of screen |
| Well Number | Date | MP) | top | bottom |
| Field Personnel | | Pump Intake at (ft. below MP) | |
| Sampling Organization | | Purging Device; (pump type) | |
| Identify MP | | Total Volume Purged | |

<table>
<thead>
<tr>
<th>Clock Time 24 HR</th>
<th>Water Depth below MP ft</th>
<th>Pump Dial$^1$</th>
<th>Purge Rate ml/min</th>
<th>Cum. Volume Purged liters</th>
<th>Temp. °C</th>
<th>Spec. Cond.$^2$ µS/cm</th>
<th>pH</th>
<th>ORP$^3$ mv</th>
<th>DO mg/L</th>
<th>Turbidity NTU</th>
<th>Comments</th>
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</tbody>
</table>

Stabilization Criteria
1. Pump dial setting (for example: hertz, cycles/min, etc).
2. µSiemens per cm (same as µmhos/cm) at 25°C.
3. Oxidation reduction potential (ORP)
Appendix 2. Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC’s Part 375 Remedial Programs
SAMPLING, ANALYSIS, AND ASSESSMENT OF PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS)

Under NYSDEC’s Part 375 Remedial Programs

DRAFT June 2022
# Table of Contents

Objective ..................................................................................................................................................... 1
Applicability ............................................................................................................................................... 1
Field Sampling Procedures ....................................................................................................................... 1
Analysis and Reporting ............................................................................................................................ 1
  - Routine Analysis ............................................................................................................................. 2
  - Additional Analysis .......................................................................................................................... 2
Data Assessment and Application to Site Cleanup .................................................................................... 3
  - Water Sample Results ..................................................................................................................... 3
  - Soil Sample Results ........................................................................................................................ 3
Testing for Imported Soil ........................................................................................................................ 4
Appendix A - Quality Assurance Project Plan (QAPP) Guidelines for PFAS ........................................... 5
Appendix B - Sampling Protocols for PFAS in Soils, Sediments and Solids ........................................ 6
Appendix C - Sampling Protocols for PFAS in Monitoring Wells .......................................................... 8
Appendix D - Sampling Protocols for PFAS in Surface Water ................................................................ 10
Appendix E - Sampling Protocols for PFAS in Private Water Supply Wells ......................................... 12
Appendix F - Sampling Protocols for PFAS in Fish .............................................................................. 14
Appendix G - PFAS Analyte List ......................................................................................................... 22
Appendix H - Data Review Guidelines for Analysis of PFAS in Non-Potable Water and Solids .......... 24
## ERRATA SHEET for

**SAMPLING, ANALYSIS, AND ASSESSMENT OF PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS) Under NYSDEC’s Part 375 Remedial Programs Issued January 17, 2020**

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<tr>
<td>Title of Appendix I, page 32</td>
<td>Appendix H</td>
<td>Appendix I</td>
<td>2/25/2020</td>
</tr>
<tr>
<td>Document Cover, page 1</td>
<td>Guidelines for Sampling and Analysis of PFAS</td>
<td>Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC’s Part 375 Remedial Programs</td>
<td>9/15/2020</td>
</tr>
<tr>
<td>Routine Analysis, page 9</td>
<td>“However, laboratories analyzing environmental samples…PFOA and PFOS in drinking water by EPA Method 537, 537.1 or ISO 25101.”</td>
<td>“However, laboratories analyzing environmental samples…PFOA and PFOS in drinking water by EPA Method 537, 537.1, ISO 25101, or Method 533.”</td>
<td>9/15/2020</td>
</tr>
<tr>
<td>Additional Analysis, page 9, new paragraph regarding soil parameters</td>
<td>None</td>
<td>“In cases where site-specific cleanup objectives for PFOA and PFOS are to be assessed, soil parameters, such as Total Organic Carbon (EPA Method 9060), soil pH (EPA Method 9045), clay content (percent), and cation exchange capacity (EPA Method 9081), should be included in the analysis to help evaluate factors affecting the leachability of PFAS in site soils.”</td>
<td>9/15/2020</td>
</tr>
<tr>
<td>Data Assessment and Application to Site Cleanup Page 10</td>
<td>Until such time as Ambient Water Quality Standards (AWQS) and Soil Cleanup Objectives (SCOs) for PFAS are published, the extent of contaminated media potentially subject to remediation should be determined on a case-by-case basis using the procedures discussed below and the criteria in DER-10. Target levels for cleanup of PFAS in other media, including biota and sediment, have not yet been established by the DEC.</td>
<td>Until such time as Ambient Water Quality Standards (AWQS) and Soil Cleanup Objectives (SCOs) for PFOA and PFOS are published, the extent of contaminated media potentially subject to remediation should be determined on a case-by-case basis using the procedures discussed below and the criteria in DER-10. Preliminary target levels for cleanup of PFOA and PFOS in other media, including biota and sediment, have not yet been established by the DEC.</td>
<td>9/15/2020</td>
</tr>
<tr>
<td>Citation and Page Number</td>
<td>Current Text</td>
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<td>--------------------------</td>
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</tr>
<tr>
<td>Water Sample Results Page 10</td>
<td>PFAS should be further assessed and considered as a potential contaminant of concern in groundwater or surface water (…) If PFAS are identified as a contaminant of concern for a site, they should be assessed as part of the remedy selection process in accordance with Part 375 and DER-10.</td>
<td>PFOA and PFOS should be further assessed and considered as potential contaminants of concern in groundwater or surface water (…) If PFOA and/or PFOS are identified as contaminants of concern for a site, they should be assessed as part of the remedy selection process in accordance with Part 375 and DER-10.</td>
<td>9/15/2020</td>
</tr>
<tr>
<td>Soil Sample Results, page 10</td>
<td>“The extent of soil contamination for purposes of delineation and remedy selection should be determined by having certain soil samples tested by Synthetic Precipitation Leaching Procedure (SPLP) and the leachate analyzed for PFAS. Soil exhibiting SPLP results above 70 ppt for either PFOA or PFOS (individually or combined) are to be evaluated during the cleanup phase.”</td>
<td>“Soil cleanup objectives for PFOA and PFOS will be proposed in an upcoming revision to 6 NYCRR Part 375-6. Until SCOs are in effect, the following are to be used as guidance values. “ [Interim SCO Table] “PFOA and PFOS results for soil are to be compared against the guidance values listed above. These guidance values are to be used in determining whether PFOA and PFOS are contaminants of concern for the site and for determining remedial action objectives and cleanup requirements. Site-specific remedial objectives for protection of groundwater can also be presented for evaluation by DEC. Development of site-specific remedial objectives for protection of groundwater will require analysis of additional soil parameters relating to leachability. These additional analyses can include any or all the parameters listed above (soil pH, cation exchange capacity, etc.) and/or use of SPLP. As the understanding of PFAS transport improves, DEC welcomes proposals for site-specific remedial objectives for protection of groundwater. DEC will expect that those may be dependent on additional factors including soil pH, aqueous pH, % organic carbon, % Sand/Silt/Clay, soil cations: K, Ca, Mg, Na, Fe, Al, cation exchange capacity, and anion exchange capacity. Site-specific remedial objectives should also consider the dilution attenuation factor (DAF). The NJDEP publication on DAF can be used as a reference: <a href="https://www.nj.gov/dep/srp/guidance/rs/daf.pdf.%E2%80%9D">https://www.nj.gov/dep/srp/guidance/rs/daf.pdf.”</a></td>
<td>9/15/2020</td>
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<td>--------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
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<tr>
<td>Testing for Imported Soil Page 11</td>
<td>Soil imported to a site for use in a soil cap, soil cover, or as backfill is to be tested for PFAS in general conformance with DER-10, Section 5.4(e) for the PFAS Analyte List (Appendix F) using the analytical procedures discussed below and the criteria in DER-10 associated with SVOCs. If PFOA or PFOS is detected in any sample at or above 1 µg/kg, then soil should be tested by SPLP and the leachate analyzed for PFAS. If the SPLP results exceed 10 ppt for either PFOA or PFOS (individually) then the source of backfill should be rejected, unless a site-specific exemption is provided by DER. SPLP leachate criteria is based on the Maximum Contaminant Levels proposed for drinking water by New York State’s Department of Health, this value may be updated based on future Federal or State promulgated regulatory standards. Remedial parties have the option of analyzing samples concurrently for both PFAS in soil and in the SPLP leachate to minimize project delays. Category B deliverables should be submitted for backfill samples, though a DUSR is not required.</td>
<td>Testing for PFAS should be included any time a full TAL/TCL analyte list is required. Results for PFOA and PFOS should be compared to the applicable guidance values. If PFOA or PFOS is detected in any sample at or above the guidance values then the source of backfill should be rejected, unless a site-specific exemption is provided by DER based on SPLP testing, for example. If the concentrations of PFOA and PFOS in leachate are at or above 10 ppt (the Maximum Contaminant Levels established for drinking water by the New York State Department of Health), then the soil is not acceptable. PFOA, PFOS and 1,4-dioxane are all considered semi-volatile compounds, so composite samples are appropriate for these compounds when sampling in accordance with DER-10, Table 5.4(e)10. Category B deliverables should be submitted for backfill samples, though a DUSR is not required.</td>
<td>9/15/2020</td>
</tr>
<tr>
<td>Citation and Page Number</td>
<td>Current Text</td>
<td>Corrected Text</td>
<td>Date</td>
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<tr>
<td>Footnotes</td>
<td>None</td>
<td>1 TOP Assay analysis of highly contaminated samples, such as those from an AFFF (aqueous film-forming foam) site, can result in incomplete oxidation of the samples and an underestimation of the total perfluoroalkyl substances. 2 The movement of PFAS in the environment is being aggressively researched at this time; that research will eventually result in more accurate models for the behaviors of these chemicals. In the meantime, DEC has calculated the soil cleanup objective for the protection of groundwater using the same procedure used for all other chemicals, as described in Section 7.7 of the Technical Support Document (<a href="http://www.dec.ny.gov/docs/remediation_hudson_pdf/techsuppdoc.pdf">http://www.dec.ny.gov/docs/remediation_hudson_pdf/techsuppdoc.pdf</a>).</td>
<td>9/15/2020</td>
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<tr>
<td>Additional Analysis, page 9</td>
<td>In cases… soil parameters, such as Total Organic Carbon (EPA Method 9060), soil…</td>
<td>In cases… soil parameters, such as Total Organic Carbon (Lloyd Kahn), soil…</td>
<td>1/8/2021</td>
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<tr>
<td>Appendix A, General Guidelines, fourth bullet</td>
<td>List the ELAP-approved lab(s) to be used for analysis of samples</td>
<td>List the ELAP-certified lab(s) to be used for analysis of samples</td>
<td>1/8/2021</td>
</tr>
<tr>
<td>Appendix E, Laboratory Analysis and Containers</td>
<td>Drinking water samples collected using this protocol are intended to be analyzed for PFAS by ISO Method 25101.</td>
<td>Drinking water samples collected using this protocol are intended to be analyzed for PFAS by EPA Method 537, 537.1, 533, or ISO Method 25101</td>
<td>1/8/2021</td>
</tr>
<tr>
<td>Water Sample Results Page 9</td>
<td>“In addition, further assessment of water may be warranted if either of the following screening levels are met: a. any other individual PFAS (not PFOA or PFOS) is detected in water at or above 100 ng/L; or b. total concentration of PFAS (including PFOA and PFOS) is detected in water at or above 500 ng/L”</td>
<td>Deleted</td>
<td>6/15/2021</td>
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<tr>
<td>Citation and Page Number</td>
<td>Current Text</td>
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<td>Date</td>
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<tr>
<td>Routine Analysis, Page XX</td>
<td>Currently, New York State Department of Health’s Environmental Laboratory Approval Program (ELAP)… criteria set forth in the DER’s laboratory guidelines for PFAS in non-potable water and solids (Appendix H - Laboratory Guidelines for Analysis of PFAS in Non-Potable Water and Solids).</td>
<td>Deleted</td>
<td>5/31/2022</td>
</tr>
<tr>
<td>Analysis and Reporting, Page XX</td>
<td>As of October 2020, the United States Environmental Protection Agency (EPA) does not have a validated method for analysis of PFAS for media commonly analyzed under DER remedial programs (non-potable waters, solids). DER has developed the following guidelines to ensure consistency in analysis and reporting of PFAS.</td>
<td>Deleted</td>
<td>5/31/2022</td>
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<tr>
<td>Routine Analysis, Page XX</td>
<td>LC-MS/MS analysis for PFAS using methodologies based on EPA Method 537.1 is the procedure to use for environmental samples. Isotope dilution techniques should be utilized for the analysis of PFAS in all media.</td>
<td>EPA Method 1633 is the procedure to use for environmental samples.</td>
<td></td>
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<tr>
<td>Soil Sample Results, Page XX</td>
<td>Soil cleanup objectives for PFOA and PFOS will be proposed in an upcoming revision to 6 NYCRR Part 375-6</td>
<td>Soil cleanup objectives for PFOA and PFOS have been proposed in an upcoming revision to 6 NYCRR Part 375-6</td>
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<td>Appendix A</td>
<td>“Include in the text… LC-MS/MS for PFAS using methodologies based on EPA Method 537.1”</td>
<td>“Include in the text …EPA Method 1633”</td>
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<td>Appendix A</td>
<td>“Laboratory should have ELAP certification for PFOA and PFOS in drinking water by EPA Method 537, 537.1, EPA Method 533, or ISO 25101”</td>
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<td>Appendix B</td>
<td>“Samples collected using this protocol are intended to be analyzed for PFAS using methodologies based on EPA Method 537.1”</td>
<td>“Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633”</td>
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<tr>
<td>Citation and Page Number</td>
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<td>Appendix C</td>
<td>“Samples collected using this protocol are intended to be analyzed for PFAS using methodologies based on EPA Method 537.1”</td>
<td>“Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633”</td>
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<td>Appendix D</td>
<td>“Samples collected using this protocol are intended to be analyzed for PFAS using methodologies based on EPA Method 537.1”</td>
<td>“Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633”</td>
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<tr>
<td>Appendix G</td>
<td>Updated to include all forty PFAS analytes in EPA Method 533</td>
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<td>Appendix H</td>
<td>Appendix I</td>
<td>Appendix H</td>
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<td>Appendix H</td>
<td>“These guidelines are intended to be used for the validation of PFAS analytical results for projects within the Division of Environmental Remediation (DER) as well as aid in the preparation of a data usability summary report.”</td>
<td>“These guidelines are intended to be used for the validation of PFAS using EPA Method 1633 for projects within the Division of Environmental Remediation (DER).”</td>
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<tr>
<td>Appendix H</td>
<td>“The holding time is 14 days…”</td>
<td>“The holding time is 28 days…”</td>
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<td>Appendix H, Initial Calibration</td>
<td>“The initial calibration should contain a minimum of five standards for linear fit…”</td>
<td>“The initial calibration should contain a minimum of six standards for linear fit…”</td>
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<tr>
<td>Appendix H, Initial Calibration</td>
<td>Linear fit calibration curves should have an R² value greater than 0.990.</td>
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<td>Appendix H, Initial Calibration Verification</td>
<td>Initial Calibration Verification Section</td>
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<tr>
<td>Appendix H</td>
<td>secondary Ion Monitoring Section</td>
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<tr>
<td>Appendix H</td>
<td>Branched and Linear Isomers Section</td>
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May 2022

Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC’s Part 375 Remedial Programs

Objective

New York State Department of Environmental Conservation’s Division of Environmental Remediation (DER) performs or oversees sampling of environmental media and subsequent analysis of PFAS as part of remedial programs implemented under 6 NYCRR Part 375. To ensure consistency in sampling, analysis, reporting, and assessment of PFAS, DER has developed this document which summarizes currently accepted procedures and updates previous DER technical guidance pertaining to PFAS.

Applicability

All work plans submitted to DEC pursuant to one of the remedial programs under Part 375 shall include PFAS sampling and analysis procedures that conform to the guidelines provided herein.

As part of a site investigation or remedial action compliance program, whenever samples of potentially affected media are collected and analyzed for the standard Target Analyte List/Target Compound List (TAL/TCL), PFAS analysis should also be performed. Potentially affected media can include soil, groundwater, surface water, and sediment. Based upon the potential for biota to be affected, biota sampling and analysis for PFAS may also be warranted as determined pursuant to a Fish and Wildlife Impact Analysis. Soil vapor sampling for PFAS is not required.

Field Sampling Procedures

DER-10 specifies technical guidance applicable to DER’s remedial programs. Given the prevalence and use of PFAS, DER has developed “best management practices” specific to sampling for PFAS. As specified in DER-10 Chapter 2, quality assurance procedures are to be submitted with investigation work plans. Typically, these procedures are incorporated into a work plan, or submitted as a stand-alone document (e.g., a Quality Assurance Project Plan). Quality assurance guidelines for PFAS are listed in Appendix A - Quality Assurance Project Plan (QAPP) Guidelines for PFAS.

Field sampling for PFAS performed under DER remedial programs should follow the appropriate procedures outlined for soils, sediments or other solids (Appendix B), non-potable groundwater (Appendix C), surface water (Appendix D), public or private water supply wells (Appendix E), and fish tissue (Appendix F).

QA/QC samples (e.g. duplicates, MS/MSD) should be collected as specified in DER-10, Section 2.3(c). For sampling equipment coming in contact with aqueous samples only, rinsate or equipment blanks should be collected. Equipment blanks should be collected at a minimum frequency of one per day per site or one per twenty samples, whichever is more frequent.

Analysis and Reporting

The investigation work plan should describe analysis and reporting procedures, including laboratory analytical
procedures for the methods discussed below. As specified in DER-10 Section 2.2, laboratories should provide a full Category B deliverable. In addition, a Data Usability Summary Report (DUSR) should be prepared by an independent, third party data validator. Electronic data submissions should meet the requirements provided at: https://www.dec.ny.gov/chemical/62440.html.

DER has developed a PFAS Analyte List (Appendix G) for remedial programs to understand the nature of contamination at sites. It is expected that reported results for PFAS will include, at a minimum, all the compounds listed. If lab and/or matrix specific issues are encountered for any analytes, the DER project manager, in consultation with the DER chemist, will make case-by-case decisions as to whether certain analytes may be temporarily or permanently discontinued from analysis at each site. As with other contaminants that are analyzed for at a site, the PFAS Analyte List may be refined for future sampling events based on investigative findings.

Routine Analysis

EPA Method 1633 is the procedure to use for environmental samples. Reporting limits for PFOA and PFOS in aqueous samples should not exceed 2 ng/L. Reporting limits for PFOA and PFOS in solid samples should not exceed 0.5 µg/kg. Reporting limits for all other PFAS in aqueous and solid media should be as close to these limits as possible. If laboratories indicate that they are not able to achieve these reporting limits for the entire PFAS Analyte List, site-specific decisions regarding acceptance of elevated reporting limits for specific PFAS can be made by the DER project manager in consultation with the DER chemist. Data review guidelines were developed by DER to ensure data comparability and usability (Appendix H - Data Review Guidelines for Analysis of PFAS in Non-Potable Water and Solids).

Additional Analysis

Additional laboratory methods for analysis of PFAS may be warranted at a site, such as the Synthetic Precipitation Leaching Procedure (SPLP) and Total Oxidizable Precursor Assay (TOP Assay).

In cases where site-specific cleanup objectives for PFOA and PFOS are to be assessed, soil parameters, such as Total Organic Carbon (Lloyd Kahn), soil pH (EPA Method 9045), clay content (percent), and cation exchange capacity (EPA Method 9081), should be included in the analysis to help evaluate factors affecting the leachability of PFAS in site soils.

SPLP is a technique used to determine the mobility of chemicals in liquids, soils and wastes, and may be useful in determining the need for addressing PFAS-containing material as part of the remedy. SPLP by EPA Method 1312 should be used unless otherwise specified by the DER project manager in consultation with the DER chemist.

Impacted materials can be made up of PFAS that are not analyzable by routine analytical methodology. A TOP Assay can be utilized to conceptualize the amount and type of oxidizable PFAS which could be liberated in the environment, which approximates the maximum concentration of perfluoroalkyl substances that could be generated if all polyfluoroalkyl substances were oxidized. For example, some polyfluoroalkyl substances may degrade or transform to form perfluoroalkyl substances (such as PFOA or PFOS), resulting in an increase in perfluoroalkyl substance concentrations as contaminated groundwater moves away from a source. The TOP Assay converts, through oxidation, polyfluoroalkyl substances (precursors) into perfluoroalkyl substances that can be detected by routine analytical methodology.1

Commercial laboratories have adopted methods which allow for the quantification of targeted PFAS in air and biota. The EPA’s Office of Research and Development (ORD) is currently developing methods which allow for air emissions characterization of PFAS, including both targeted and non-targeted analysis of PFAS. Consult with the DER project manager and the DER chemist for assistance on analyzing biota/tissue and air samples.

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1 TOP Assay analysis of highly contaminated samples, such as those from an AFFF (aqueous film-forming foam) site, can result in incomplete oxidation of the samples and an underestimation of the total perfluoroalkyl substances.
Data Assessment and Application to Site Cleanup

Until such time as Ambient Water Quality Standards (AWQS) and Soil Cleanup Objectives (SCOs) for PFOA and PFOS are published, the extent of contaminated media potentially subject to remediation should be determined on a case-by-case basis using the procedures discussed below and the criteria in DER-10. Preliminary target levels for cleanup of PFOA and PFOS in other media, including biota and sediment, have not yet been established by the DEC.

Water Sample Results

PFOA and PFOS should be further assessed and considered as potential contaminants of concern in groundwater or surface water if PFOA or PFOS is detected in any water sample at or above 10 ng/L (ppt) and is determined to be attributable to the site, either by a comparison of upgradient and downgradient levels, or the presence of soil source areas, as defined below.

If PFOA and/or PFOS are identified as contaminants of concern for a site, they should be assessed as part of the remedy selection process in accordance with Part 375 and DER-10.

Soil Sample Results

Soil cleanup objectives for PFOA and PFOS have been proposed in an upcoming revision to 6 NYCRR Part 375-6. Until SCOs are in effect, the following are to be used as guidance values:

<table>
<thead>
<tr>
<th>Anticipated Site Use</th>
<th>PFOA (ppb)</th>
<th>PFOS (ppb)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unrestricted</td>
<td>0.66</td>
<td>0.88</td>
</tr>
<tr>
<td>Residential</td>
<td>6.6</td>
<td>8.8</td>
</tr>
<tr>
<td>Restricted Residential</td>
<td>33</td>
<td>44</td>
</tr>
<tr>
<td>Commercial</td>
<td>500</td>
<td>440</td>
</tr>
<tr>
<td>Industrial</td>
<td>600</td>
<td>440</td>
</tr>
<tr>
<td>Protection of Groundwater</td>
<td>1.1</td>
<td>3.7</td>
</tr>
</tbody>
</table>

PFOA and PFOS results for soil are to be compared against the guidance values listed above. These guidance values are to be used in determining whether PFOA and PFOS are contaminants of concern for the site and for determining remedial action objectives and cleanup requirements. Site-specific remedial objectives for protection of groundwater can also be presented for evaluation by DEC. Development of site-specific remedial objectives for protection of groundwater will require analysis of additional soil parameters relating to leachability. These additional analyses can include any or all the parameters listed above (soil pH, cation exchange capacity, etc.) and/or use of SPLP.

As the understanding of PFAS transport improves, DEC welcomes proposals for site-specific remedial objectives for protection of groundwater. DEC will expect that those may be dependent on additional factors including soil pH, aqueous pH, % organic carbon, % Sand/Silt/Clay, soil cations: K, Ca, Mg, Na, Fe, Al, cation exchange capacity, and anion exchange capacity. Site-specific remedial objectives should also consider the dilution attenuation factor (DAF). The NJDEP publication on DAF can be used as a reference:


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2 The movement of PFAS in the environment is being aggressively researched at this time; that research will eventually result in more accurate models for the behaviors of these chemicals. In the meantime, DEC has calculated the guidance value for the protection of groundwater using the same procedure used for all other chemicals, as described in Section 7.7 of the Technical Support Document (http://www.dec.ny.gov/docs/remediation_hudson_pdf/techsuppdoc.pdf).
May 2022

Testing for Imported Soil

Testing for PFAS should be included any time a full TAL/TCL analyte list is required. Results for PFOA and PFOS should be compared to the applicable guidance values. If PFOA or PFOS is detected in any sample at or above the guidance values then the source of backfill should be rejected, unless a site-specific exemption is provided by DER based on SPLP testing, for example. If the concentrations of PFOA and PFOS in leachate are at or above 10 ppt (the Maximum Contaminant Levels established for drinking water by the New York State Department of Health), then the soil is not acceptable.

PFOA, PFOS and 1,4-dioxane are all considered semi-volatile compounds, so composite samples are appropriate for these compounds when sampling in accordance with DER-10, Table 5.4(e)10. Category B deliverables should be submitted for backfill samples, though a DUSR is not required.
Appendix A - Quality Assurance Project Plan (QAPP) Guidelines for PFAS

The following guidelines (general and PFAS-specific) can be used to assist with the development of a QAPP for projects within DER involving sampling and analysis of PFAS.

General Guidelines in Accordance with DER-10

- Document/work plan section title – Quality Assurance Project Plan
- Summarize project scope, goals, and objectives
- Provide project organization including names and resumes of the project manager, Quality Assurance Officer (QAO), field staff, and Data Validator
  - The QAO should not have another position on the project, such as project or task manager, that involves project productivity or profitability as a job performance criterion
- List the ELAP certified lab(s) to be used for analysis of samples
- Include a site map showing sample locations
- Provide detailed sampling procedures for each matrix
- Include Data Quality Usability Objectives
- List equipment decontamination procedures
- Include an “Analytical Methods/Quality Assurance Summary Table” specifying:
  - Matrix type
  - Number or frequency of samples to be collected per matrix
  - Number of field and trip blanks per matrix
  - Analytical parameters to be measured per matrix
  - Analytical methods to be used per matrix with minimum reporting limits
  - Number and type of matrix spike and matrix spike duplicate samples to be collected
  - Number and type of duplicate samples to be collected
  - Sample preservation to be used per analytical method and sample matrix
  - Sample container volume and type to be used per analytical method and sample matrix
  - Sample holding time to be used per analytical method and sample matrix
- Specify Category B laboratory data deliverables and preparation of a DUSR

Specific Guidelines for PFAS

- Include in the text that sampling for PFAS will take place
- Include in the text that PFAS will be analyzed by EPA Method 1633
- Include the list of PFAS compounds to be analyzed (PFAS Analyte List)
- Include the laboratory SOP for PFAS analysis
- List the minimum method-achievable Reporting Limits for PFAS
  - Reporting Limits should be less than or equal to:
    - Aqueous – 2 ng/L (ppt)
    - Solids – 0.5 µg/kg (ppb)
- Include the laboratory Method Detection Limits for the PFAS compounds to be analyzed
- Include detailed sampling procedures
  - Precautions to be taken
  - Pump and equipment types
  - Decontamination procedures
  - Approved materials only to be used
- Specify that regular ice only will be used for sample shipment
- Specify that equipment blanks should be collected at a minimum frequency of 1 per day per site for each matrix
Appendix B - Sampling Protocols for PFAS in Soils, Sediments and Solids

General

The objective of this protocol is to give general guidelines for the collection of soil, sediment and other solid samples for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Containers

Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633. The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation’s Division of Environmental Remediation.

No sampling equipment components or sample containers should come in to contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials including sample bottle cap liners with a PTFE layer.

A list of acceptable equipment is provided below, but other equipment may be considered appropriate based on sampling conditions.

- stainless steel spoon
- stainless steel bowl
- steel hand auger or shovel without any coatings

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Sampling is often conducted in areas where a vegetative turf has been established. In these cases, a pre-cleaned trowel or shovel should be used to carefully remove the turf so that it may be replaced at the conclusion of sampling. Surface soil samples (e.g. 0 to 6 inches below surface) should then be collected using a pre-cleaned, stainless steel spoon. Shallow subsurface soil samples (e.g. 6 to ~36 inches below surface) may be collected by digging a hole using a pre-cleaned hand auger or shovel. When the desired subsurface depth is reached, a pre-cleaned hand auger or shovel shall be used to obtain the sample.

When the sample is obtained, it should be deposited into a stainless steel bowl for mixing prior to filling the sample containers. The soil should be placed directly into the bowl and mixed thoroughly by rolling the material into the middle until the material is homogenized. At this point the material within the bowl can be placed into the laboratory provided container.
Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).

Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at 4 ± 2° Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- Request appropriate data deliverable (Category B) and an electronic data deliverable

Documentation

A soil log or sample log shall document the location of the sample/borehole, depth of the sample, sampling equipment, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate. Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appropriate rain gear (PVC, polyurethane, or rubber rain gear are acceptable), bug spray, and sunscreen should be used that does not contain PFAS. Well washed cotton coveralls may be used as an alternative to bug spray and/or sunscreen.

PPE that contains PFAS is acceptable when site conditions warrant additional protection for the samplers and no other materials can be used to be protective. Documentation of such use should be provided in the field notes.
Appendix C - Sampling Protocols for PFAS in Monitoring Wells

General

The objective of this protocol is to give general guidelines for the collection of groundwater samples for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Container

Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633. The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include: stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation’s Division of Environmental Remediation.

No sampling equipment components or sample containers should come in contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials including plumbers tape and sample bottle cap liners with a PTFE layer.

A list of acceptable equipment is provided below, but other equipment may be considered appropriate based on sampling conditions.

- stainless steel inertia pump with HDPE tubing
- peristaltic pump equipped with HDPE tubing and silicone tubing
- stainless steel bailer with stainless steel ball
- bladder pump (identified as PFAS-free) with HDPE tubing

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Monitoring wells should be purged in accordance with the sampling procedure (standard/volume purge or low flow purge) identified in the site work plan, which will determine the appropriate time to collect the sample. If sampling using standard purge techniques, additional purging may be needed to reduce turbidity levels, so samples contain a limited amount of sediment within the sample containers. Sample containers that contain sediment may cause issues at the laboratory, which may result in elevated reporting limits and other issues during the sample preparation that can compromise data usability. Sampling personnel should don new nitrile gloves prior to sample collection due to the potential to contact PFAS containing items (not related to the sampling equipment) during the purging activities.
Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).

Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at 4 ± 2º Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- Collect one equipment blank per day per site and minimum 1 equipment blank per 20 samples. The equipment blank shall test the new and decontaminated sampling equipment utilized to obtain a sample for residual PFAS contamination. This sample is obtained by using laboratory provided PFAS-free water and passing the water over or through the sampling device and into laboratory provided sample containers
- Additional equipment blank samples may be collected to assess other equipment that is utilized at the monitoring well
- Request appropriate data deliverable (Category B) and an electronic data deliverable

Documentation

A purge log shall document the location of the sample, sampling equipment, groundwater parameters, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate. Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appropriate rain gear (PVC, polyurethane, or rubber rain gear are acceptable), bug spray, and sunscreen should be used that does not contain PFAS. Well washed cotton coveralls may be used as an alternative to bug spray and/or sunscreen.

PPE that contains PFAS is acceptable when site conditions warrant additional protection for the samplers and no other materials can be used to be protective. Documentation of such use should be provided in the field notes.
Appendix D - Sampling Protocols for PFAS in Surface Water

General

The objective of this protocol is to give general guidelines for the collection of surface water samples for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Container

Samples collected using this protocol are intended to be analyzed for PFAS using EPA Method 1633.

The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include: stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation’s Division of Environmental Remediation.

No sampling equipment components or sample containers should come in contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials including sample bottle cap liners with a PTFE layer.

A list of acceptable equipment is provided below, but other equipment may be considered appropriate based on sampling conditions.

- stainless steel cup

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Where conditions permit, (e.g. creek or pond) sampling devices (e.g. stainless steel cup) should be rinsed with site medium to be sampled prior to collection of the sample. At this point the sample can be collected and poured into the sample container.

If site conditions permit, samples can be collected directly into the laboratory container.

Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).
Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at 4 ± 2º Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- Collect one equipment blank per day per site and minimum 1 equipment blank per 20 samples. The equipment blank shall test the new and decontaminated sampling equipment utilized to obtain a sample for residual PFAS contamination. This sample is obtained by using laboratory provided PFAS-free water and passing the water over or through the sampling device and into laboratory provided sample containers
- Request appropriate data deliverable (Category B) and an electronic data deliverable

Documentation

A sample log shall document the location of the sample, sampling equipment, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate. Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including GORE-TEX®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.

Appropriate rain gear (PVC, polyurethane, or rubber rain gear are acceptable), bug spray, and sunscreen should be used that does not contain PFAS. Well washed cotton coveralls may be used as an alternative to bug spray and/or sunscreen.

PPE that contains PFAS is acceptable when site conditions warrant additional protection for the samplers and no other materials can be used to be protective. Documentation of such use should be provided in the field notes.
Appendix E - Sampling Protocols for PFAS in Private Water Supply Wells

General

The objective of this protocol is to give general guidelines for the collection of water samples from private water supply wells (with a functioning pump) for PFAS analysis. The sampling procedure used should be consistent with Sampling Guidelines and Protocols – Technological Background and Quality Control/Quality Assurance for NYS DEC Spill Response Program – March 1991 (http://www.dec.ny.gov/docs/remediation_hudson_pdf/sgpsect5.pdf), with the following limitations.

Laboratory Analysis and Container

Drinking water samples collected using this protocol are intended to be analyzed for PFAS by EPA Method 537, 537.1, 533, or ISO Method 25101. The preferred material for containers is high density polyethylene (HDPE). Pre-cleaned sample containers, coolers, sample labels, and a chain of custody form will be provided by the laboratory.

Equipment

Acceptable materials for sampling include stainless steel, HDPE, PVC, silicone, acetate, and polypropylene. Additional materials may be acceptable if pre-approved by New York State Department of Environmental Conservation’s Division of Environmental Remediation.

No sampling equipment components or sample containers should come in contact with aluminum foil, low density polyethylene, glass, or polytetrafluoroethylene (PTFE, Teflon™) materials (e.g. plumbers tape), including sample bottle cap liners with a PTFE layer.

Equipment Decontamination

Standard two step decontamination using detergent (Alconox is acceptable) and clean, PFAS-free water will be performed for sampling equipment. All sources of water used for equipment decontamination should be verified in advance to be PFAS-free through laboratory analysis or certification.

Sampling Techniques

Locate and assess the pressure tank and determine if any filter units are present within the building. Establish the sample location as close to the well pump as possible, which is typically the spigot at the pressure tank. Ensure sampling equipment is kept clean during sampling as access to the pressure tank spigot, which is likely located close to the ground, may be obstructed and may hinder sample collection.

Prior to sampling, a faucet downstream of the pressure tank (e.g., washroom sink) should be run until the well pump comes on and a decrease in water temperature is noted which indicates that the water is coming from the well. If the homeowner is amenable, staff should run the water longer to purge the well (15+ minutes) to provide a sample representative of the water in the formation rather than standing water in the well and piping system including the pressure tank. At this point a new pair of nitrile gloves should be donned and the sample can be collected from the sample point at the pressure tank.

Sample Identification and Logging

A label shall be attached to each sample container with a unique identification. Each sample shall be included on the chain of custody (COC).
Quality Assurance/Quality Control

- Immediately place samples in a cooler maintained at 4 ± 2°C Celsius using ice
- Collect one field duplicate for every sample batch, minimum 1 duplicate per 20 samples. The duplicate shall consist of an additional sample at a given location
- Collect one matrix spike / matrix spike duplicate (MS/MSD) for every sample batch, minimum 1 MS/MSD per 20 samples. The MS/MSD shall consist of an additional two samples at a given location and identified on the COC
- If equipment was used, collect one equipment blank per day per site and a minimum 1 equipment blank per 20 samples. The equipment blank shall test the new and decontaminated sampling equipment utilized to obtain a sample for residual PFAS contamination. This sample is obtained by using laboratory provided PFAS-free water and passing the water over or through the sampling device and into laboratory provided sample containers.
- A field reagent blank (FRB) should be collected at a rate of one per 20 samples. The lab will provide a FRB bottle containing PFAS free water and one empty FRB bottle. In the field, pour the water from the one bottle into the empty FRB bottle and label appropriately.
- Request appropriate data deliverable (Category B) and an electronic data deliverable
- For sampling events where multiple private wells (homes or sites) are to be sampled per day, it is acceptable to collect QC samples at a rate of one per 20 across multiple sites or days.

Documentation

A sample log shall document the location of the private well, sample point location, owner contact information, sampling equipment, purge duration, duplicate sample, visual description of the material, and any other observations or notes determined to be appropriate and available (e.g. well construction, pump type and location, yield, installation date). Additionally, care should be performed to limit contact with PFAS containing materials (e.g. waterproof field books, food packaging) during the sampling process.

Personal Protection Equipment (PPE)

For most sampling Level D PPE is anticipated to be appropriate. The sampler should wear nitrile gloves while conducting field work and handling sample containers.

Field staff shall consider the clothing to be worn during sampling activities. Clothing that contains PTFE material (including Gore-Tex®) or that have been waterproofed with PFAS materials should be avoided. All clothing worn by sampling personnel should have been laundered multiple times.
Appendix F - Sampling Protocols for PFAS in Fish

This appendix contains a copy of the latest guidelines developed by the Division of Fish and Wildlife (DFW) entitled “General Fish Handling Procedures for Contaminant Analysis” (Ver. 8).

**Procedure Name:** General Fish Handling Procedures for Contaminant Analysis

**Number:** FW-005

**Purpose:** This procedure describes data collection, fish processing and delivery of fish collected for contaminant monitoring. It contains the chain of custody and collection record forms that should be used for the collections.

**Organization:** Environmental Monitoring Section
Bureau of Ecosystem Health
Division of Fish and Wildlife (DFW)
New York State Department of Environmental Conservation (NYSDEC)
625 Broadway
Albany, New York 12233-4756

**Version:** 8

**Previous Version Date:** 21 March 2018

**Summary of Changes to this Version:** Updated bureau name to Bureau of Ecosystem Health. Added direction to list the names of all field crew on the collection record. Minor formatting changes on chain of custody and collection records.

**Originator or Revised by:** Wayne Richter, Jesse Becker

**Date:** 26 April 2019

**Quality Assurance Officer and Approval Date:** Jesse Becker, 26 April 2019
GENERAL FISH HANDLING PROCEDURES FOR CONTAMINANT ANALYSES

A. Original copies of all continuity of evidence (i.e., Chain of Custody) and collection record forms must accompany delivery of fish to the lab. A copy shall be directed to the Project Leader or as appropriate, Wayne Richter. All necessary forms will be supplied by the Bureau of Ecosystem Health. Because some samples may be used in legal cases, it is critical that each section is filled out completely. Each Chain of Custody form has three main sections:

1. The top box is to be filled out and signed by the person responsible for the fish collection (e.g., crew leader, field biologist, researcher). This person is responsible for delivery of the samples to DEC facilities or personnel (e.g., regional office or biologist).

2. The second section is to be filled out and signed by the person responsible for the collections while being stored at DEC, before delivery to the analytical lab. This may be the same person as in (1), but it is still required that they complete the section. Also important is the range of identification numbers (i.e., tag numbers) included in the sample batch.

3. Finally, the bottom box is to record any transfers between DEC personnel and facilities. Each subsequent transfer should be identified, signed, and dated, until laboratory personnel take possession of the fish.

B. The following data are required on each Fish Collection Record form:

1. Project and Site Name.

2. DEC Region.

3. All personnel (and affiliation) involved in the collection.

4. Method of collection (gill net, hook and line, etc.)

5. Preservation Method.

C. The following data are to be taken on each fish collected and recorded on the Fish Collection Record form:

1. Tag number - Each specimen is to be individually jaw tagged at time of collection with a unique number. Make sure the tag is turned out so that the number can be read without opening the bag. Use tags in sequential order. For small fish or composite samples place the tag inside the bag with the samples. The Bureau of Ecosystem Health can supply the tags.

2. Species identification (please be explicit enough to enable assigning genus and species). Group fish by species when processing.

3. Date collected.

4. Sample location (waterway and nearest prominent identifiable landmark).

5. Total length (nearest mm or smallest sub-unit on measuring instrument) and weight (nearest g or
smallest sub-unit of weight on weighing instrument). Take all measures as soon as possible with calibrated, protected instruments (e.g. from wind and upsets) and prior to freezing.

6. Sex - fish may be cut enough to allow sexing or other internal investigation, but do not eviscerate. Make any incision on the right side of the belly flap or exactly down the midline so that a left-side fillet can be removed.

D. General data collection recommendations:

1. It is helpful to use an ID or tag number that will be unique. It is best to use metal striped bass or other uniquely numbered metal tags. If uniquely numbered tags are unavailable, values based on the region, water body and year are likely to be unique: for example, R7CAY11001 for Region 7, Cayuga Lake, 2011, fish 1. If the fish are just numbered 1 through 20, we have to give them new numbers for our database, making it more difficult to trace your fish to their analytical results and creating an additional possibility for errors.

2. Process and record fish of the same species sequentially. Recording mistakes are less likely when all fish from a species are processed together. Starting with the bigger fish species helps avoid missing an individual.

3. If using Bureau of Ecosystem Health supplied tags or other numbered tags, use tags in sequence so that fish are recorded with sequential Tag Numbers. This makes data entry and login at the lab and use of the data in the future easier and reduces keypunch errors.

4. Record length and weight as soon as possible after collection and before freezing. Other data are recorded in the field upon collection. An age determination of each fish is optional, but if done, it is recorded in the appropriate “Age” column.

5. For composite samples of small fish, record the number of fish in the composite in the Remarks column. Record the length and weight of each individual in a composite. All fish in a composite sample should be of the same species and members of a composite should be visually matched for size.

6. Please submit photocopies of topographic maps or good quality navigation charts indicating sampling locations. GPS coordinates can be entered in the Location column of the collection record form in addition to or instead for providing a map. These records are of immense help to us (and hopefully you) in providing documented location records which are not dependent on memory and/or the same collection crew. In addition, they may be helpful for contaminant source trackdown and remediation/control efforts of the Department.

7. When recording data on fish measurements, it will help to ensure correct data recording for the data recorder to call back the numbers to the person making the measurements.

E. Each fish is to be placed in its own individual plastic bag. For small fish to be analyzed as a composite, put all of the fish for one composite in the same bag but use a separate bag for each composite. It is important to individually bag the fish to avoid difficulties or cross contamination when processing the fish for chemical analysis. Be sure to include the fish’s tag number inside the bag, preferably attached to the fish with the tag number turned out so it can be read. Tie or otherwise secure the bag closed. The Bureau of Ecosystem Health will supply the bags. If necessary, food grade bags may be procured from a suitable vendor (e.g., grocery store). It is preferable to redundantly label each bag with a manila tag tied between the knot and the body of the bag. This tag should be labeled with the project name, collection location, tag number, collection date, and fish species. If scales are collected, the scale envelope should be labeled with
the same information.

F. Groups of fish, by species, are to be placed in one large plastic bag per sampling location. The Bureau of Ecosystem Health will supply the larger bags. Tie or otherwise secure the bag closed. Label the site bag with a manila tag tied between the knot and the body of the bag. The tag should contain: project, collection location, collection date, species and tag number ranges. Having this information on the manila tag enables lab staff to know what is in the bag without opening it.

G. Do not eviscerate, fillet or otherwise dissect the fish unless specifically asked to. If evisceration or dissection is specified, the fish must be cut along the exact midline or on the right side so that the left side fillet can be removed intact at the laboratory. If filleting is specified, the procedure for taking a standard fillet (SOP PREPLAB 4) must be followed, including removing scales.

H. Special procedures for PFAS: Unlike legacy contaminants such as PCBs, which are rarely found in day to day life, PFAS are widely used and frequently encountered. Practices that avoid sample contamination are therefore necessary. While no standard practices have been established for fish, procedures for water quality sampling can provide guidance. The following practices should be used for collections when fish are to be analyzed for PFAS:

- No materials containing Teflon.
- No Post-it notes.
- No ice packs; only water ice or dry ice.
- Any gloves worn must be powder free nitrile.
- No Gore-Tex or similar materials (Gore-Tex is a PFC with PFOA used in its manufacture).
- No stain repellent or waterproof treated clothing; these are likely to contain PFCs.
- Avoid plastic materials, other than HDPE, including clipboards and waterproof notebooks.
- Wash hands after handling any food containers or packages as these may contain PFCs.
- Keep pre-wrapped food containers and wrappers isolated from fish handling.
- Wear clothing washed at least six times since purchase.
- Wear clothing washed without fabric softener.
- Staff should avoid cosmetics, moisturizers, hand creams and similar products on the day of sampling as many of these products contain PFCs (Fujii et al. 2013). Sunscreen or insect repellent should not contain ingredients with “fluor” in their name. Apply any sunscreen or insect repellent well downwind from all materials. Hands must be washed after touching any of these products.

I. All fish must be kept at a temperature <45° F (<8° C) immediately following data processing. As soon as possible, freeze at -20° C ± 5° C. Due to occasional freezer failures, daily freezer temperature logs are required. The freezer should be locked or otherwise secured to maintain chain of custody.

J. In most cases, samples should be delivered to the Analytical Services Unit at the Hale Creek field station. Coordinate delivery with field station staff and send copies of the collection records, continuity of evidence forms and freezer temperature logs to the field station. For samples to be analyzed elsewhere, non-routine collections or other questions, contact Wayne Richter, Bureau of Ecosystem Health, NYSDEC, 625 Broadway, Albany, New York 12233-4756, 518-402-8974, or the project leader about sample transfer. Samples will then be directed to the analytical facility and personnel noted on specific project descriptions.

K. A recommended equipment list is at the end of this document.
## Fish Collection Record

**Project and Site Name**: 

**Collections made by (include all crew)**: 

**Sampling Method**:  
- Electrofishing  
- Gill netting  
- Trap netting  
- Trawling  
- Seining  
- Angling  
- Other: ________________________________  

**Preservation Method**:  
- Freezing  
- Other: ________________________________  

**Notes (SWFDB survey number)**:  

### FOR LAB USE ONLY  

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<th>COLLECTION OR TAG NO.</th>
<th>SPECIES</th>
<th>DATE TAKEN</th>
<th>LOCATION</th>
<th>AGE</th>
<th>SEX &amp;/OR REPROD. CONDIT</th>
<th>LENGTH ( )</th>
<th>WEIGHT ( )</th>
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NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
CHAIN OF CUSTODY

I, _____________________________, of ___________________________________________ collected the
(Print Name) (Print Business Address)
following on _______________________, 20____ from ____________________________________________
(Date) (Water Body)
in the vicinity of _________________________________________________________________________
(Landmark, Village, Road, etc.)
Town of ______________________________________, in ________________________________ County.

Item(s) ________________________________________________________________________________
_______________________________________________________________________________________

Said sample(s) were in my possession and handled according to standard procedures provided to me prior to
collection. The sample(s) were placed in the custody of a representative of the New York State Department of
Environmental Conservation on ___________________________________, 20______.

_____________________________________________ __________________________
Signature Date

I, _________________________________, received the above mentioned sample(s) on the date specified
and assigned identification number(s) ______________________________________ to the sample(s). I
have recorded pertinent data for the sample(s) on the attached collection records. The sample(s) remained in
my custody until subsequently transferred, prepared or shipped at times and on dates as attested to below.

_____________________________________________ __________________________
Signature Date

<table>
<thead>
<tr>
<th>SECOND RECIPIENT (Print Name)</th>
<th>TIME &amp; DATE</th>
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richter: revised 21 April 2014; becker: 23 March 2017, 26 April, 2019
NOTICE OF WARRANTY

By signature to the chain of custody (reverse), the signatory warrants that the information provided is truthful and accurate to the best of his/her ability. The signatory affirms that he/she is willing to testify to those facts provided and the circumstances surrounding the same. Nothing in this warranty or chain of custody negates responsibility nor liability of the signatories for the truthfulness and accuracy of the statements provided.

HANDLING INSTRUCTIONS

On day of collection, collector(s) name(s), address(es), date, geographic location of capture (attach a copy of topographic map or navigation chart), species, number kept of each species, and description of capture vicinity (proper noun, if possible) along with name of Town and County must be indicated on reverse.

Retain organisms in manila tagged plastic bags to avoid mixing capture locations. Note appropriate information on each bag tag.

Keep samples as cool as possible. Put on ice if fish cannot be frozen within 12 hours. If fish are held more than 24 hours without freezing, they will not be retained or analyzed.

Initial recipient (either DEC or designated agent) of samples from collector(s) is responsible for obtaining and recording information on the collection record forms which will accompany the chain of custody. This person will seal the container using packing tape and writing his signature, the time and the date across the tape onto the container with indelible marker. Any time a seal is broken, for whatever purpose, the incident must be recorded on the Chain of Custody (reason, time, and date) in the purpose of transfer block. Container then is resealed using new tape and rewriting signature, with time and date.
EQUIPMENT LIST

Scale or balance of appropriate capacity for the fish to be collected.

Fish measuring board.

Plastic bags of an appropriate size for the fish to be collected and for site bags.

Individually numbered metal tags for fish.

Manila tags to label bags.

Small envelopes, approximately 2” x 3.5”, if fish scales are to be collected.

Knife for removing scales.

Chain of custody and fish collection forms.

Clipboard.

Pens or markers.

Paper towels.

Dish soap and brush.

Bucket.

Cooler.

Ice.

Duct tape.
## Appendix G – PFAS Analyte List

<table>
<thead>
<tr>
<th>Group</th>
<th>Chemical Name</th>
<th>Abbreviation</th>
<th>CAS Number</th>
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Appendix H - Data Review Guidelines for Analysis of PFAS in Non-Potable Water and Solids

General

These guidelines are intended to be used for the validation of PFAS using EPA Method 1633 for projects within the Division of Environmental Remediation (DER). Data reviewers should understand the methodology and techniques utilized in the analysis. Consultation with the end user of the data may be necessary to assist in determining data usability based on the data quality objectives in the Quality Assurance Project Plan. A familiarity with the laboratory’s Standard Operating Procedure may also be needed to fully evaluate the data. If you have any questions, please contact DER’s Quality Assurance Officer, Dana Barbarossa, at dana.barbarossa@dec.ny.gov.

Preservation and Holding Time

Samples should be preserved with ice to a temperature of less than 6°C upon arrival at the lab. The holding time is 28 days to extraction for aqueous and solid samples. The time from extraction to analysis for aqueous samples is 28 days and 40 days for solids.

| Temperature greatly exceeds 6°C upon arrival at the lab* | Use professional judgement to qualify detects and non-detects as estimated or rejected |
| Holding time exceeding 28 days to extraction | Use professional judgement to qualify detects and non-detects as estimated or rejected if holding time is grossly exceeded |

*Samples that are delivered to the lab immediately after sampling may not meet the thermal preservation guidelines. Samples are considered acceptable if they arrive on ice or an attempt to chill the samples is observed.

Initial Calibration

The initial calibration should contain a minimum of six standards for linear fit and six standards for a quadratic fit. The relative standard deviation (RSD) for a quadratic fit calibration should be less than 20%.

The low-level calibration standard should be within 50% - 150% of the true value, and the mid-level calibration standard within 70% - 130% of the true value.

| %RSD >20% | J flag detects and UJ non detects |

Continuing Calibration Verification

Continuing calibration verification (CCV) checks should be analyzed at a frequency of one per ten field samples. If CCV recovery is very low, where detection of the analyte could be in question, ensure a low level CCV was analyzed and use to determine data quality.

| CCV recovery <70 or >130% | J flag results |
Blanks

There should be no detections in the method blanks above the reporting limits. Equipment blanks, field blanks, rinse blanks etc. should be evaluated in the same manner as method blanks. Use the most contaminated blank to evaluate the sample results.

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<th>Sample Result</th>
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<td>Qualify as ND at reporting limit</td>
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<tr>
<td>Any detection</td>
<td>&gt;Reporting Limit and &gt;10x the blank result</td>
<td>No qualification</td>
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<tr>
<td>&gt;Reporting limit</td>
<td>&gt;Reporting limit and &lt;10x blank result</td>
<td>J+ biased high</td>
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</table>

Field Duplicates

A blind field duplicate should be collected at rate of one per twenty samples. The relative percent difference (RPD) should be less than 30% for analyte concentrations greater than two times the reporting limit. Use the higher result for final reporting.

| RPD >30% | Apply J qualifier to parent sample |

Lab Control Spike

Lab control spikes should be analyzed with each extraction batch or one for every twenty samples. In the absence of lab derived criteria, use 70% - 130% recovery criteria to evaluate the data.

| Recovery <70% or >130% (lab derived criteria can also be used) | Apply J qualifier to detects and UJ qualifier to non detects |

Matrix Spike/Matrix Spike Duplicate

One matrix spike and matrix spike duplicate should be collected at a rate of one per twenty samples. Use professional judgement to reject results based on out of control MS/MSD recoveries.

| Recovery <70% or >130% (lab derived criteria can also be used) | Apply J qualifier to detects and UJ qualifier to non detects of parent sample only |
| RPD >30% | Apply J qualifier to detects and UJ qualifier to non detects of parent sample only |

Extracted Internal Standards (Isotope Dilution Analytes)

Problematic analytes (e.g. PFBA, PFPeA, fluorotelomer sulfonates) can have wider recoveries without qualification. Qualify corresponding native compounds with a J flag if outside of the range.

| Recovery <50% or >150% | Apply J qualifier |
| Recovery <25% or >150% for poor responding analytes | Apply J qualifier |
| Isotope Dilution Analyte (IDA) Recovery <10% | Reject results |
Signal to Noise Ratio

The signal to noise ratio for the quantifier ion should be at least 3:1. If the ratio is less than 3:1, the peak is discernable from the baseline noise and symmetrical, the result can be reported. If the peak appears to be baseline noise and/or the shape is irregular, qualify the result as tentatively identified.

Reporting Limits

If project-specific reporting limits were not met, please indicate that in the report along with the reason (e.g. over dilution, dilution for non-target analytes, high sediment in aqueous samples).

Peak Integrations

Target analyte peaks should be integrated properly and consistently when compared to standards. Ensure branched isomer peaks are included for PFAS where standards are available. Inconsistencies should be brought to the attention of the laboratory or identified in the data review summary report.
I. Summary:

Groundwater monitoring wells provide essential access to the subsurface for scientific and engineering investigations (including monitoring wells installed for leak detection purposes). To a degree, every monitoring well is an environmental liability because of the potential to act as a conduit for pollution to reach the groundwater. To limit the environmental risk, a groundwater monitoring well must be properly decommissioned when its effective life has been reached. This document provides procedures to satisfactorily decommission groundwater monitoring wells in New York State. This policy also pertains to other temporary wells such as observation wells, test wells, de-watering wells and other small diameter, non-potable water wells. It does not pertain to water supply wells.

II. Policy:

Environmental monitoring wells should be decommissioned when:

1. they are no longer needed and re-use by another program is not an option; or
2. the well’s integrity is suspect or compromised.

The method for decommissioning will be determined based upon well construction and environmental parameters. The method selected must be designed to protect groundwater and implemented according to current best engineering practices while following all applicable federal, state and local regulations. *Groundwater Monitoring Well Decommissioning Procedures* shall be maintained as an addendum to this policy.

This policy is applicable to all New York State Department of Environmental Conservation (DEC) programs that install, utilize and maintain monitoring wells for the study of groundwater, except monitoring wells for landfills regulated under 6 NYCRR Part 360 decommissioned in accordance with those regulations [see 6 NYCRR 360-2.11(a)(8)(vi)] and wells installed under the Oil, Gas and Solution Mining Law, Environmental Conservation Law Article 23. There is no specific time frame to dictate when to decommission a well; timing is dependent upon the use and condition of the well.
and shall be determined on an individual basis. Best professional judgment must be exercised when using the decommissioning procedures. Outside of DEC use, this policy is mandatory when incorporated into the specifications of a state contract, an Order on Consent or a permit. In all other situations, it shall serve as guidance.

III. Purpose and Background:

This document establishes a monitoring well decommissioning policy and provides technical guidance. Synonyms for well decommissioning include “plugging,” “capping” and “abandoning. For consistency, only the term “decommissioning” is used within this document.

Unprotected, neglected and improperly abandoned monitoring wells are a serious environmental liability. They can function as a pollution conduit for surface contaminants to reach the subsurface and pollute our groundwater. They also can cause unwanted mixing of groundwater, which degrades the overall water quality within an aquifer. Improperly constructed, poorly maintained or damaged monitoring wells can yield anomalous poor data that can compromise the findings of an environmental investigation or remediation project. Unneeded or compromised monitoring wells should be properly decommissioned in order to prevent harm to our groundwater.

Since 1980, the DEC has installed, directed or overseen the installation of thousands of monitoring wells throughout New York for various state and federal programs, such as Superfund, solid waste, Resource Conservation and Recovery Act (RCRA), spill response, petroleum bulk storage and chemical bulk storage. This guidance addresses the environmental liability associated with this aging network of wells.

Within its boring zone, a successfully decommissioned well prevents the following:

1. Migration of existing or future contaminants into an aquifer or between aquifers;
2. Migration of existing or future contaminants within the vadose zone;
3. Potential for vertical or horizontal migration of fluids in the well or adjacent to the well; and
4. Any change in the aquifer yield and hydrostatic head, unless due to natural conditions.

Monitoring well construction in New York varies considerably with factors such as age of the well, local geology and either the presence or absence of contamination. The predominant type of monitoring well in New York is the shallow, watertable monitoring well constructed of polyvinyl chloride plastic (PVC). The best method for decommissioning should be selected to suit the conditions and circumstances. Each decommissioning situation is to be evaluated separately using this guidance before a method is chosen and implemented.
IV. Responsibility:

The Division of Environmental Remediation (DER) is responsible for updating this policy and the *Groundwater Monitoring Well Decommissioning Procedures* (addendum) in consultation with the Division of Solid and Hazardous Materials (DSHM) and the Division of Water (DOW). Compliance with the guidance does not relieve any party of the obligation to properly decommission a monitoring well. Oversight responsibility will be carried out by the DEC Regional Engineer.

V. Procedure:

*Groundwater Monitoring Well Decommissioning Procedures*, the addendum to this policy, provides guidance on proper decommissioning of monitoring wells in New York State.

VI. Related References:


- 6 NYCRR Part 360 Solid Waste Management Facilities, New York State Department of Environmental Conservation, Division of Solid and Hazardous Materials.

- Specifications for Abandoning Wells and Boreholes in Unconsolidated Materials, New York State Department of Environmental Conservation, Region 1 - Water Unit, undated.

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# TABLE OF CONTENTS

**INTRODUCTION** ............................................................................................................. 3

1.0 PREPARATION ........................................................................................................... 3

2.0 DECOMMISSIONING METHODS ........................................................................... 4
   2.1 Grouting In-Place .............................................................................................. 5
   2.2 Casing Perforating/Grouting In-Place ............................................................... 6
   2.3 Casing Pulling .................................................................................................... 6
   2.4 Over-Drilling....................................................................................................... 7

3.0 SELECTION PROCESS AND IMPLEMENTATION ................................................. 8
   3.1 Bedrock Wells .................................................................................................... 8
   3.2 Uncontaminated Overburden Wells ................................................................. 9
   3.3 Contaminated Overburden Monitoring Wells/Piezometers ......................... 9
   3.4 Telescoped Riser ............................................................................................... 10

4.0 LOCATING AND SETTING-UP ON THE WELL ..................................................... 10

5.0 REMOVING THE PROTECTIVE CASING ............................................................... 10

6.0 SELECTING, MIXING, AND PLACING GROUT ..................................................... 11
   6.1 Standard Grout Mixture ................................................................................... 11
   6.2 Special Mixture ................................................................................................. 12
   6.3 Grout Mixing Procedure ................................................................................. 12
   6.4 Grout Placement ............................................................................................... 12

7.0 BACKFILLING AND SITE RESTORATION ............................................................. 13

8.0 DOCUMENTATION ................................................................................................... 13

9.0 FIELD OVERSIGHT ................................................................................................. 14

10.0 RELATED REFERENCES .......................................................................................... 14
FIGURES

FIGURE 1 - MONITORING WELL FIELD INSPECTION LOG
FIGURE 2 - DECOMMISSIONING PROCEDURE SELECTION
FIGURE 3 - WELL DECOMMISSIONING RECORD

APPENDICES

APPENDIX A - REPORTS

APPENDIX A1 - INSPECTOR’S DAILY REPORT
APPENDIX A2 - PROBLEM IDENTIFICATION REPORT
APPENDIX A3 - CORRECTIVE MEASURES REPORT
INTRODUCTION

This document, *Groundwater Monitoring Well Decommissioning Procedures*, is the addendum to CP-43, *Groundwater Monitoring Well Decommissioning Policy*, which provides acceptable procedures to be used as guidance when decommissioning monitoring wells in New York State. Please note that this document does not address some site-specific special situations that may be encountered in the field. Compliance with the procedures set forth in this document does not relieve any party of the obligation to properly decommission a monitoring well.

Unprotected, neglected and improperly abandoned monitoring wells are a serious environmental liability. They can function as a pollution conduit for surface contaminants to reach the subsurface and pollute our groundwater. They also can cause unwanted mixing of groundwater, which degrades the overall water quality within an aquifer. Improperly constructed, poorly maintained or damaged monitoring wells can yield anomalous poor data that can compromise the findings of an environmental investigation or remediation project. Unneeded or compromised monitoring wells should be properly decommissioned in order to prevent harm to our groundwater.

Previous versions of this guidance have been issued since 1995. Originally developed as a specification for well decommissioning at Love Canal, the procedures were rewritten to make them applicable across the state. From an engineering standpoint, the guidance has changed very little. Most situations do not require a complex procedure.

If you have any questions, please contact Will Welling at (518) 402-9814.

Sincerely,

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1.0 PREPARATION

If an unneeded monitoring well remains in good usable condition, an alternative to decommissioning might be the reuse by another agency program. DEC encourages reuse in situations where a well will continue to be used and cared for responsibly.

When reuse is not an option, the first step in the well decommissioning process is to review all pertinent well construction information. One must know the well depth and construction details. GPS coordinates and permanent labeling (if available) will be useful in confirming the well to be decommissioned. An inspection must be performed prior to decommissioning in order to verify the construction and condition of each well. Specific details and subsurface conditions form the basis for decisions throughout the decommissioning process.
Well Details

1. Is the well a single stem riser (all one diameter)?
2. Is the well a simple overburden well (no penetration into bedrock)?
3. Does the well riser consist of telescoping diameters of pipe which decrease with depth?
4. Is the well seal compromised (leaking, inadequate or damaged)?
5. If the well is PVC, is it 25 feet or shallower and not grouted into rock?
6. Can the riser be pulled and is removal of the well desired?
7. Is the well a bedrock well?
8. If the monitoring well is a bedrock well, does it have an open hole?
9. Is there a well assembly (riser and screen) installed within the bedrock hole?

Subsurface Conditions

10. Is the soil contaminated?
11. Does the well penetrate a confining layer?
12. If the well penetrates a confining layer, might overdrilling or casing pulling cause contamination to travel up or down through a break in the confining layer?
13. Does the screened interval cross multiple water-bearing zones?

For additional collection and verification of information, the "Monitoring Well Field Inspection Log" (Figure 1) can be used during a field inspection. After the well has been located and the information gathered, one is ready to select the decommissioning procedure in accordance with Section 2.

Special conditions, such as access problems, well extensions through capped and covered non-Part 360 landfills and seasonal weather patterns affecting construction, should be assessed in the planning stage. Decommissioning work requiring the use of heavy vehicular equipment on landfill caps should be scheduled during dry weather (if possible) so as to minimize damage to the cover. If work must be performed during the spring, winter or inclement weather, special measures to reduce ruts should be employed to maintain the integrity of a completed landfill cover system. As an example, placement of plywood under vehicular equipment can eliminate deep ruts that would require repair.

2.0 DECOMMISSIONING METHODS

The primary rationale for well decommissioning is to remove any potential groundwater pathway. A secondary rationale, often important to the property owner or owner of the well, is to physically remove the well. Removed well materials may be recycled and will not interfere with future construction excavation. The previous versions of these decommissioning procedures have stressed that physical removal of the well by pulling is preferable to leaving casing in the ground. Due to the added effort, expense and risk involved with pulling, the decision of whether to pull or not should be a separate consideration aside from selecting the sealing procedure.

One should select a decommissioning procedure that takes into account the geologic and hydrogeologic conditions at the well site; the presence or absence of contamination in the groundwater; and original well construction details. The selection process for well decommissioning procedures is provided by the flow chart, Figure 2. Answers to the questions...
in the preceding section are the input for this flow chart. The four primary well decommissioning methods are:

1. Grouting in-place;
2. Perforating the casing followed by grouting in-place;
3. Grouting in-place followed by casing pulling;
4. Over-drilling and grouting with or without a temporary casing.

In a complex situation, one or more decommissioning procedures may be used for different intervals of the same well.

The remainder of Section 2 discusses the well decommissioning methods and the selection process. Refer to Figure 2 for a flow chart diagram of the complete procedure selection process. The DEC Project Manager has the discretion to deviate from the flow chart, (Figure 2), based on site conditions and professional judgment.

2.1 Grouting In-Place

Grouting in-place is the simplest and most frequently used well decommissioning method and grouting itself is the essential component of all the decommissioning methods. The grout seals the borehole and any portion of the monitoring well that may be left in the ground. Because dirt and foreign objects can fall into an open well, whenever possible a well should be sealed first with grout before attempting subsequent decommissioning steps.

For the purpose of these decommissioning procedures, the well seal is defined as the bentonite seal above the sand pack. Aside from obvious channeling by in-flowing surface water around the well, an indication of the well seal integrity may be obtained through review of the boring logs and/or a comparison of groundwater elevations if the well is part of a cluster. Any problems noted on the boring logs pertaining to the well seal, such as bridging of bentonite pellets or running sands, or disparities between field notes (if available) and the well log would indicate the potential for a poor (compromised) well seal.

If the well seal is not compromised and there is no confining layer present, a single-stem, 2-inch PVC, monitoring well can be satisfactorily decommissioned by grouting it in-place. If the seal is compromised, casing perforation may be called for as discussed in Section 2.2.

As discussed in Section 2.4 and its sub-sections, this method is specified for the bedrock portion of a well, and is used for decommissioning small diameter cased wells. Grouting in-place involves filling the casing with grout to a level of five feet below the land surface, cutting the well casing at the five-foot depth, and removing the top portion of the casing and associated well materials from the ground. The casing must be grouted according to the procedures in Section 6. In addition, the upper five feet of the borehole is filled to land surface and restored according to the procedures described in Section 7.

For open-hole bedrock wells, the procedure involves filling the opening with grout to the top of rock according to the procedures in Section 5. A thicker grout may be required to fill any bedrock voids. If excessive grout is being lost down-hole, consider grouting in stages to reduce the pressure caused by the height of the grout column.
The standard mix with the maximum amount of allowable water will be required to penetrate the well screen and sand pack when a well assembly has been installed within a bedrock hole. For an assembly such as this, the grout should be mixed thinly enough to penetrate the slots and sand pack. The grout mixes are discussed in Sections 6.1 and 6.2.

2.2 Casing Perforating/Grouting In-Place

Casing perforation followed by grouting in-place is the preferred method to use if there is poor documentation of the grouting of the well annulus, or the annulus was allowed to be back-filled with cuttings. The grout will squeeze through the perforations to seal any porous zones along the outside of the casing. The procedure involves puncturing, cutting or splitting the well casing and screen followed by grouting the well. A variety of commercial equipment is available for perforating casings and screens in wells with four-inch or larger inside diameters. Due to the diversity of applications, experienced contractors must recommend a specific technique based on site-specific conditions. A minimum of four rows of perforations several inches long around the circumference of the pipe and a minimum of five perforations per linear foot of casing or screen is recommended (American Society for Testing and Materials, Standard D 5299-99, 1999). After the perforating is complete, the borehole must be grouted according to the procedures in Section 6 and the upper five feet of borehole restored according to the procedures in Section 7.

2.3 Casing Pulling

Casing pulling should be used in cases where the materials of the well assembly are to be recycled, or the well assembly must be removed to clear the site for future excavation or re-development. Casing pulling is an acceptable method to use when no contamination is present; contamination is present but the well does not penetrate a confining layer; and when both contamination and a confining layer are present but the contamination cannot cross the confining layer. Additionally, the well construction materials and well depth must be such that pulling will not break the riser. When contamination is likely to cross the confining layer during pulling, a temporary casing can be used. See Section 2.4.

Casing pulling involves removing the well casing by lifting. Grout is to be added during pulling; the grout will fill the space once occupied by the material being withdrawn. An acceptable procedure to remove casing involves puncturing the bottom of the well or using a casing cutter to cut away the screen, grouting, using jacks to free casing from the hole, and lifting the casing out by using a drill rig, backhoe, crane, or other suitable equipment. Additional grout must be added to the casing as it is withdrawn. Grout mixing and placement procedures are provided in Section 6. In wells or well points in which the bottom cannot be punctured, the casing or screened interval will be perforated or cut away prior to being filled with grout. This procedure should be followed for wells installed in collapsible formations or for highly contaminated wells.

At sites in which well casings have been grouted into the top of bedrock, the casing pulling procedure should not be attempted unless the casing can be first cut or freed from the rock.
2.4 Over-Drilling

Over-drilling is the technique used to physically remove an entire monitoring well, its sand pack and the old grout column and fill. In situations where PVC screens and risers are expected to sever and removal of all well materials is required, over-drilling will be required. Over-drilling is called for when a riser can’t be pulled and it penetrates a confining layer. Compared to the other procedures, over-drilling is the least common method of well decommissioning.

A “temporary casing” may be necessary when extraordinary conditions are present, such as a high concentration of mobile contaminants in the overburden, depth to water is shallow, there is poor construction documentation or shoddy construction practices. The approach involves installing a large diameter steel casing around the outside of the well followed by drilling / pulling /grouting within this casing. The casing is withdrawn at the end of pulling, grouting and (perhaps) drilling. If the confining layer is less than 5 feet thick, the casing should be installed to the top of the confining layer. Otherwise, it is installed to a depth of 2 feet below the top of the confining layer. After the outer casing has been set, the well can be removed and grouted through pulling if possible or removed and grouted by drilling inside the casing.

Over-drilling is used where casing pulling is determined to be unfeasible, or where installation of a temporary casing is necessary to prevent cross-contamination, such as when a confining layer is present and contamination in the deeper aquifer could migrate to the upper aquifer as the well is pulled. The over-drilling method should:

- Follow the original well bore;
- Create a borehole of the same or greater diameter than the original boring; and
- Remove all of the well construction materials.

In over-drilling the difficulty lies in keeping the augers centered on the old well as the bit is lowered; it will tend to wander off. As a precaution, the well column should be filled with grout before over-drilling. Then without allowing the grout to dry, the driller proceeds with over-drilling the well. Grouting first guarantees that if the drill wanders off the old well and the effort is less than 100% successful, the remaining well portion will at least have been grouted. There are many methods for over-drilling. Please note that the following methods are not suitable for all types of casing, and the advice of an experienced driller should be sought.

- Conventional augering (i.e., a hollow stem auger fitted with a pilot bit). The pilot bit will grind the well construction materials, which will be brought to the well surface by the auger.

- A conventional cable tool rig to advance “temporary” casing having a larger diameter than the original boring. The cable tool kit is advanced within the casing to grind the well construction materials and soils, which are periodically removed with large diameter bailer. This method is not applicable to bedrock wells.
• An over-reaming tool with a pilot bit nearly the same size as the inside diameter of the casing and a reaming bit slightly larger than the original borehole diameter. This method can be used for wells with steel casings.

• A hollow-stem auger with outward facing carbide cutting teeth having a diameter two to four inches larger than the casing.

Prior to over-drilling, the bottom of the well should be perforated or cut away, and the casing filled with grout as with casing removal by pulling.

In all cases above, over-drilling should advance beyond the original bore depth by a distance of half a foot to ensure complete removal of the construction materials. Oversight attention should be focused on the drill cuttings, looking for fragments of well materials. Absence of these indicators is a sign that the drill has wandered off the well. If wandering is suspected, having previously filled the well with grout, the remaining portion which cannot be over-drilled can be considered grouted in-place. When the over-drilling is complete, grout should be tremied within the annular space between the augers and well casings. The grout level in the borehole should be maintained as the drilling equipment and well materials are sequentially removed. As with all the other methods, the upper five feet of borehole should be restored according to the procedures in Section 7.

3.0 SELECTION PROCESS AND IMPLEMENTATION

The decommissioning procedure selection flow chart, Figure 2, is to be used to select decommissioning methods. The selection process first identifies the basic monitoring well type. There are only two types of monitoring wells described in this guidance, overburden wells and bedrock wells. Bedrock wells typically have an overburden portion which in the selection process is to be treated as an overburden well. Techniques are specified for wells based upon their type and the other physical conditions present. Decommissioning techniques called for by the selection process have their practical limits; construction details dictate when a well stem can be pulled without breaking and when it cannot be pulled. The DEC project manager has the discretion to deviate from the flow chart, (Figure 2), based on site conditions, budgetary concerns and professional judgment. The remainder of this section will discuss types of monitoring wells in various settings along with recommended decommissioning techniques.

3.1 Bedrock Wells

Referring to Figure 2 and Section 2.1, if the well extends into bedrock, the rock hole portion of the well is to be grouted in-place to the top of the rock. The grout mix, however, may vary according to the conditions. A thicker grout may be required to fill voids and a thinner grout may be necessary to penetrate well screen and sand pack. Refer to the grout mixture specifications given in Section 6.1 and 6.2.

Prior to grouting, the depth of the well will be measured to determine if any silt or debris has plugged the well. If plugging has occurred, all reasonable attempts to clear it should be made before grouting. The borehole will then be tremie grouted according to Section 6.4 from the bottom of the well to the top of bedrock to ensure a continuous grout column.
After the rock hole is grouted, the overburden portion of the well is decommissioned using appropriate techniques described below. If the bedrock extends to the ground surface, grouting can extend to the ground surface or to slightly below so that the site can be restored as appropriate in accordance with Section 7.

3.2 Uncontaminated Overburden Wells

For overburden wells and the overburden portion of bedrock wells, the first factor in determining the decommissioning method is whether the overburden portion of the well exhibits contamination, as determined through historical groundwater and/or soil sampling results. If the overburden is uncontaminated, the next criteria considers whether the well penetrates a confining layer. In the case that the overburden portion of the well does not penetrate a confining layer, the casing can either be tremie-grouted and pulled or tremie grouted and left in place. As a general rule, PVC wells greater than 25-feet deep should not be pulled unless site-specific conditions or other factors indicate that the well can be pulled without breaking. If the well cannot be pulled, the well should be grouted in-place as accordance with Sections 2.1 and 2.2.

If a non-telescoped overburden well penetrates a confining layer, the casing should be removed by pulling (if possible) in accordance with Section 2.3. If the casing cannot be removed by pulling, the well should be grouted in-place or where complete removal is required, removed by over-drilling. Over-drilling will be based upon the site-specific conditions and requirements. If pulling is attempted and fails (i.e., a portion of the riser breaks) the remaining portion of the well should be removed by using the conventional augering procedure identified in Section 2.4. Note that if the riser is broken during pulling, it is highly unlikely that the driller will be able to target it to over-drill it. This is the reason why all wells should be grouted first. In all cases, after the well construction materials have been removed to the extent possible, the borehole will be grouted in accordance with Section 6 and the upper five feet will be restored in accordance with Section 7.

3.3 Contaminated Overburden Monitoring Wells/Piezometers

Contamination in the overburden plays a role in the selection process. Any contamination present in the overburden must not be allowed to spread as a result of the decommissioning construction. For wells and piezometers suspected or known to be contaminated with light non-aqueous phase liquid (LNAPL) and/or dense non-aqueous phase liquid (DNAPL), often referred to as “product,” the decision to decommission the well should be reviewed. Such gross contamination is a special condition and requires design of the decommissioning procedure. If decommissioning is determined to be the proper course of action, measurement of the non-aqueous phase liquid volume will be determined and this liquid will be removed.

If an overburden well (or the overburden portion of a bedrock well) is contaminated with LNAPL, DNAPL and/or dissolved fractions as indicated by historical sampling results, one must evaluate the potential for contamination to cross an overburden confining layer (if one exists) during decommissioning. A rock or soil horizon of very low permeability is known as a confining layer. Contamination in the overburden lying above a confining layer is a significant condition to recognize. To prevent mobile contaminants from crossing a confining layer during pulling or over-drilling, a temporary casing should be installed to isolate the work zone. One should follow the procedure selection flow chart. Some contaminated conditions call for over-
drilling or a specially designed procedure.

A well in contaminated overburden may be grouted in-place as long as the grout fully seals the well and boring zone. If a well in contaminated overburden was constructed allowing formation collapse as annular backfill or if the well has a compromised well seal, one must either physically remove the well or thoroughly perforate the riser and grout it in-place.

If physical removal of the well is required and the overburden contaminants are likely to be dragged upward or downward during decommissioning, a temporary casing should be used to seal off the construction work zone. Casing pulling and overdrilling can be safely accomplished within the temporary casing. Section 2.4 discusses the temporary casing technique.

### 3.4 Telescop ed Riser

If the riser is telescop ed in one or more outer casings, the decommissioning approach depends upon the integrity of the well seal. If there is no evidence that the well seal integrity is compromised, the riser should be grouted in-place in accordance with Sections 2.1 or 2.2 and the upper 5 feet of the well surface should be restored in accordance with Section 7. If indications are that the well seal is not competent, it will be necessary to design and implement a special procedure to perforate and grout or remove the well construction materials. The presence and configuration of the outer casing(s) will be specific in the individual wells and will be a key factor in the decommissioning approach. The special procedure must mitigate the potential for cross-contamination during removal of the well construction materials.

### 4.0 LOCATING AND SETTING-UP ON THE WELL

Prior to mobilizing to decommission a monitoring well, one should notify the property owner and/or other interested parties including the governing regulatory agency. It is advisable that when at the well location, one should review the proposed well decommissioning procedure. Verify well locations and identification by their identifying markers and GPS coordinates. Lastly, verify the depth of each well with respect to depth recorded on the well construction log.

### 5.0 REMOVING THE PROTECTIVE CASING

Most monitoring wells installed in non-traffic locations are finished with an elevated, protective casing (guard pipe) and a concrete rain pad. Wells at gasoline stations, usually being in high-traffic areas, are typically finished with a flush-mount, curb box and protective 8" dia steel inspection plate rather than a stick-up riser. The curb box is usually easily removed from around the flush-mount well before pulling or over-drilling. In the case of stick-up wells, the riser pipe may be bonded to the guard pipe and rain pad. When the protective casing and concrete pad of a stick-up monitoring well are "yanked out," a PVC riser will typically break off at the bottom of the guard pipe several feet below grade. Once this happens, it may become impossible to center a drill rig upon the well. The riser may become splintered and structurally unstable for pulling. Unless grouted first, the well may fill with dirt. Before pulling a casing or over-drilling a well, a method must be devised for removing these protective surface pieces without jeopardizing the remaining decommissioning effort.

Generally, unless the protective casing is loose and can be safely lifted off by hand, one
should fill the monitoring well with grout before removing the outer protective casing. This will ensure that the well is properly sealed regardless of any problems later when removing the protective casing. Remove the protective casing or road box vault initially only if the stick-up or vault will interfere with subsequent down-hole work which must be done before grouting. This down-hole work may include puncturing, perforating or cutting the screen or riser. But as a general procedure don't remove the protective casing or road box until after initial grouting is complete.

The procedure for removing the protective casing of a well depends upon the decommissioning method specified for the monitoring well. The variety of protective casings available preclude developing a specific removal procedure but often one can simply break up the concrete seal surrounding the casing and jack or hoist the protective casing out of the ground. A check should be made during pulling to ensure that the inner well casing is not being hoisted with the protective casing. If this occurs, the well casing should be cut off after the base of the protective casing is lifted above the land surface. At well locations where the riser has been extended, the burial of a previous concrete pad may require the excavation of soil to the top of the concrete pad to remove the well.

Steel well casing should be removed approximately five feet below the land surface so as to be below the frost line and out of the way of any subsequent shallow digging. The upper five feet of casing and the protective casing can be removed in one operation if a casing cutter is used.

Waste handling and disposal must be consistent with the methods used for the other well materials unless an alternate disposal method can be employed (i.e., steam cleaning followed by disposal as non-hazardous waste).

6.0 SELECTING, MIXING, AND PLACING GROUT

This section gives recipes for the “standard grout mixture” and the thicker “special grout mixture.” Mixing and placing grout is also discussed in this section. The goal of well decommissioning is to eliminate the capability of water to travel up or down within the volume of the former well and its boring. Success depends upon the correct grout mixture and placement where it is needed. There are two types of grout mixes that may be used to seal monitoring wells: a standard mix and a special mix. Both mixes use Type I Portland cement and four percent bentonite by weight. However, the special mix uses a smaller volume of water and is used in situations where excessive loss of the standard grout mix is possible (e.g., highly-fractured bedrock or coarse gravels).

6.1 Standard Grout Mixture

For most boreholes, the following standard mixture will be used:

- One 94-pound bag Type I Portland cement;
- 3.9 pounds powdered bentonite; and
- 7.8 gallons potable water.
Slightly more water may be used in order to penetrate a sand pack when a well screen transects multiple flow zones. This mixture results in a grout with a bentonite content of four percent by weight and will be used in all cases except in boreholes where excessive use of grout is anticipated. In these cases a special thicker mixture will be used.

6.2 Special Mixture

In cases where excessive use of grout is anticipated, such as high permeability formations and highly fractured or cavernous bedrock formations, the following special mixture will be used:

- one 94-pound bag type I Portland cement;
- 3.9 pounds powdered bentonite;
- 1 pound calcium chloride; and
- 6.0-7.8 gallons potable water (depending on desired thickness).

The special mixture results in a grout with a bentonite content of four percent by dry weight. It is thicker than the standard mixture because it contains less water. This grout is expected to set faster than the Standard Grout Mixture due to the added calcium chloride. The least amount of water that can be added for the mixture to be readily pumpable is 6 gallons per 94-pound bag of cement.

6.3 Grout Mixing Procedure

To begin the grout-mixing procedure, calculate the volume of grout required to fill the borehole. If possible, the mixing basin should be large enough to hold all of the grout necessary for the borehole.

Mix grout until a smooth, homogeneous mixture is achieved. Grout can be mixed manually or with a mechanized mixer. Colloidal mixers should not be used as they tend to excessively decrease the thickness of the grout for the above recipes.

6.4 Grout Placement

This guidance requires that grout be placed in the well from the bottom to the top by means of a "tremie." A tremie is a pipe, a hose or a tube extending from the grout supply to the bottom of the well. The tremie delivers the grout all the way down through the water column without its being diluted and mixed with the water that may be present in the well. The tremie pipe or tube is withdrawn as (or after) the well is filled with grout.

Using the tremie, grout is placed in the borehole filling from the bottom to the top. Two-inch and larger wells should use tremie tubing of not less than 1-inch diameter. Smaller diameter wells will call for a smaller tremie pipe. Grout will then be pumped in until the grout appears at the land surface (when grouting open holes in bedrock, the grout level only needs to reach above the bedrock surface). Any groundwater displaced during grout placement, if known to be contaminated, will be contained for proper disposal.

At this time the rate of settling should be observed. If grouting the well in place, the well
casing remains in the hole. But if the decommissioning method has involved down-hole tools such as hollow-stem augers or temporary casing for overdrilling, these will be removed from the hole. As each section is removed, grout will be added to keep the level between 0 and 5 feet below grade. If the grout level drops below the land surface to an excessive degree, an alternate grouting method must be used. One possibility is to grout in stages; i.e., the first batch of grout is allowed to partially cure before a second batch of grout is added.

As previously described in Section 5.0, the outer protective casing "stick-up" should be removed only after a well has been properly filled with grout. This will ensure that the well is properly sealed regardless of any breakage which may occur when removing the stick-up. It is important to reiterate that when either casing pulling or over-drilling are required, due to the uncertainty of successfully pulling a well or over-boring a well, we insist that the driller tremie grout the well first. Then without allowing the grout to dry, the driller proceeds with pulling the casing or over-drilling the well.

Upon completion of grouting, ensure that the final grout level is approximately five feet below land surface. A ferrous metal marker will be embedded in the top of the grout to indicate the location of the former monitoring well. Lastly, a fabric "utility" marking should be placed one foot above the grout so an excavator can see it clearly.

7.0 BACKFILLING AND SITE RESTORATION

The uppermost five feet of the borehole at the land surface should be filled with material physically similar to the natural soils. The surface of the borehole should be restored to the condition of the area surrounding the borehole. For example, concrete or asphalt will be patched with concrete or asphalt of the same type and thickness, grassed areas will be seeded, and topsoil will be used in other areas. All solid waste materials generated during the decommissioning process must be disposed of properly.

8.0 DOCUMENTATION

A form which may be used in the field to record the decommissioning construction is included as Figure 3. Additional documentation may be required by a DEC project manager and samples are included in Appendix A. Programs within the DEC that maintain geographic data on monitoring wells strive to keep that data up to date. Owners of these data sets must be notified when a well is decommissioned. Historical groundwater quality data is linked to monitoring well locations so when a well is decommissioned, existing GIS data must be updated to reflect that fact but the coordinate location in the GIS database should not be eliminated. A metal detector may not be able to detect a deeply buried marker so if this locator is important for future utility runs or foundations, a map should be submitted to the property owner and the town engineer showing the decommissioned well locations. Global Positioning System (GPS) coordinates should be indicated on this map. Lastly, whatever documentation is produced should be provided to the property owner, the DEC, and all other parties involved.
9.0 FIELD OVERSIGHT

Over-drilling requires careful observation to detect whether the drill has wandered off the well. Grout preparation and tremie work should be carefully observed. The successful implementation of a decommissioning work plan depends upon proper direction, observation and oversight. Methods to be employed must be clearly worked through and all parties must understand what they have to do before going into the field. Flexibility is allowed where necessary but the work effort must be thorough and effective to protect our groundwater.

10.0 RELATED REFERENCES


- New York State Department of Environmental Conservation, Division of Solid and Hazardous Materials, 6 NYCRR Part 360, Solid Waste Management Facilities.

- New York State Department of Environmental Conservation, Region I - Water Unit, Specifications for Abandoning Wells and Boreholes in Unconsolidated Materials, undated.

FIGURES

FIGURE 1 - MONITORING WELL FIELD INSPECTION LOG
FIGURE 2 - DECOMMISSIONING PROCEDURE SELECTION
FIGURE 3 - WELL DECOMMISSIONING RECORD

APPENDICES

APPENDIX A - REPORTS

APPENDIX A1 - INSPECTOR’S DAILY REPORT
APPENDIX A2 - PROBLEM IDENTIFICATION REPORT
APPENDIX A3 - CORRECTIVE MEASURES REPORT
FIGURE 1

MONITORING WELL FIELD INSPECTION LOG
WELL VISIBLE? (If not, provide directions below) .................................................................  
WELL I.D. VISIBLE? ....................................................................................................................  
WELL LOCATION MATCH SITE MAP? (if not, sketch actual location on back) ......................  
WELL I.D. AS IT APPEARS ON PROTECTIVE CASING OR WELL: ..................................  
SURFACE SEAL PRESENT? ........................................................................................................  
SURFACE SEAL COMPETENT? (If cracked, heaved etc., describe below) .........................  
PROTECTIVE CASING IN GOOD CONDITION? (If damaged, describe below) .................  
HEADSPACE READING (ppm) AND INSTRUMENT USED ....................................................  
TYPE OF PROTECTIVE CASING AND HEIGHT OF STICKUP IN FEET (If applicable)  
MEASURE PROTECTIVE CASING INSIDE DIAMETER (Inches): .......................................  
LOCK PRESENT? .......................................................................................................................  
LOCK FUNCTIONAL? ..................................................................................................................  
DID YOU REPLACE THE LOCK? ...............................................................................................  
IS THERE EVIDENCE THAT THE WELL IS DOUBLE CASED? (If yes, describe below)  
WELL MEASURING POINT VISIBLE? ....................................................................................  
MEASURE WELL DEPTH FROM MEASURING POINT (Feet): ...............................................  
MEASURE DEPTH TO WATER FROM MEASURING POINT (Feet): ......................................  
MEASURE WELL DIAMETER (Inches): ....................................................................................  
WELL CASING MATERIAL: .......................................................................................................  
PHYSICAL CONDITION OF VISIBLE WELL CASING: .........................................................  
ATTACH ID MARKER (if well ID is confirmed) and IDENTIFY MARKER TYPE .................  
PROXIMITY TO UNDERGROUND OR OVERHEAD UTILITIES ........................................  
Describe access to well: (Include accessibility to truck mounted rig, natural obstructions, overhead power lines, proximity to permanent structures, etc.); add sketch of location on back, if necessary.

Describe well setting (For example, located in a field, in a playground, on pavement, in a garden, etc.) and assess the type of restoration required.

Identify any nearby potential sources of contamination, if present (e.g. Gas station, salt pile, etc.):

Remarks:
FIGURE 2

DECOMMISSIONING PROCEDURE SELECTION
FIGURE 3

WELL DECOMMISSIONING RECORD
### FIGURE 3
**WELL DECOMMISSIONING RECORD**

<table>
<thead>
<tr>
<th>Site Name:</th>
<th>Well I.D.:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Location:</td>
<td>Driller:</td>
</tr>
<tr>
<td>Drilling Co.:</td>
<td>Inspector:</td>
</tr>
<tr>
<td>Date:</td>
<td></td>
</tr>
</tbody>
</table>

#### DECOMMISSIONING DATA
(Fill in all that apply)

**OVERDRILLING**
- Interval Drilled
- Drilling Method(s)
- Borehole Dia. (in.)
- Temporary Casing Installed? (y/n)
- Depth temporary casing installed
- Casing type/dia. (in.)
- Method of installing

**CASING PULLING**
- Method employed
- Casing retrieved (feet)
- Casing type/dia. (in.)

**CASING PERFORATING**
- Equipment used
- Number of perforations/foot
- Size of perforations
- Interval perforated

**GROUTING**
- Interval grouted (FBLS)
- # of batches prepared
- For each batch record:
  - Quantity of water used (gal.)
  - Quantity of cement used (lbs.)
  - Cement type
  - Quantity of bentonite used (lbs.)
  - Quantity of calcium chloride used (lbs.)
  - Volume of grout prepared (gal.)
  - Volume of grout used (gal.)

**COMMENTS:**

* Sketch in all relevant decommissioning data, including: interval overdrilled, interval grouted, casing left in hole, well stickup, etc.

Drilling Contractor ____________________________ Department Representative ____________________________

---

A3-28
APPENDIX A - REPORTS

APPENDIX A1 - INSPECTOR’S DAILY REPORT

APPENDIX A2 - PROBLEM IDENTIFICATION REPORT

APPENDIX A3 - CORRECTIVE MEASURES REPORT
# Inspector’s Daily Report

**CONTRACTOR:**

**ADDRESS:**

**TELEPHONE:**

**LOCATION:**

**WEATHER**

**FROM**

**TO**

**TEMP**

**A.M.**

**P.M.**

**DATE**

## CONTRACTOR'S WORK FORCE AND EQUIPMENT

<table>
<thead>
<tr>
<th>DESCRIPTION</th>
<th>H</th>
<th>DESCRIPTION</th>
<th>H</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Field Engineer</td>
<td></td>
<td>Equipment</td>
<td></td>
<td>Front Loader Ton</td>
</tr>
<tr>
<td>Superintendent</td>
<td></td>
<td>Ironworker</td>
<td></td>
<td>Generators</td>
</tr>
<tr>
<td>Laborer Foreman</td>
<td></td>
<td>Carpenter</td>
<td></td>
<td>Welding Equip.</td>
</tr>
<tr>
<td>Laborer</td>
<td></td>
<td></td>
<td></td>
<td>Backhoe</td>
</tr>
<tr>
<td>Operating Engineer</td>
<td></td>
<td>Concrete Finisher</td>
<td></td>
<td>Paving Equip. &amp; Roller</td>
</tr>
<tr>
<td>Carpenter</td>
<td></td>
<td></td>
<td></td>
<td>Air compressor</td>
</tr>
</tbody>
</table>

SEE REVERSE SIDE FOR SKETCH

WORK PERFORMED:

PAY ITEMS

<table>
<thead>
<tr>
<th>CONTRACT NUMBER</th>
<th>STA ITEM</th>
<th>FROM</th>
<th>TO</th>
<th>DESCRIPTION</th>
<th>QUANTITY</th>
<th>REMARKS</th>
</tr>
</thead>
</table>

TEST PERFORMED:  

QA PERSONNEL:  

SIGNATURE:  

VISITORS:  

REPORT NUMBER:  

SHEET: Of  

A3-31
## PROBLEM IDENTIFICATION REPORT

### Date

<table>
<thead>
<tr>
<th>Day</th>
<th>Su</th>
<th>M</th>
<th>T</th>
<th>W</th>
<th>Th</th>
<th>F</th>
<th>Sa</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sky/Precip.</td>
<td>Clear</td>
<td>Partly Cloudy</td>
<td>Cloudy</td>
<td>Rainy</td>
<td>Snow</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TEMP.</td>
<td>&lt;32°F</td>
<td>32-40°F</td>
<td>40-70°F</td>
<td>70-80°F</td>
<td>80-90°F</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WIND</td>
<td>No</td>
<td>Light</td>
<td>Strong</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HUMIDITY</td>
<td>Dry</td>
<td>Mod.</td>
<td>Humid</td>
<td></td>
<td></td>
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<td></td>
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</tbody>
</table>

### Project

<table>
<thead>
<tr>
<th>Job Number</th>
</tr>
</thead>
</table>

### Contractor

<table>
<thead>
<tr>
<th>Subject</th>
</tr>
</thead>
</table>

### PROBLEM DESCRIPTION

Reference Daily Report Number 1:

### PROBLEM LOCATION - REFERENCE TEST RESULTS AND LOCATION

(Note: Use sketches on back of form as appropriate)

### PROBABLE CAUSES


### SUGGESTED CORRECTIVE MEASURES


### APPROVALS

**QA ENGINEER:**

**PROJECT MANAGER:**

**Distribution:**

1. Project Manager
2. Field Office
3. File
4. Owner

**QA Personnel**

**Signature:**
CORRECTIVE MEASURES REPORT

Date ________________

Day Su M T W Th F Sa

Project ____________________ Job Number ________

Contractor ____________________________________________

Subject ____________________________________________

CORRECTIVE MEASURES REPORT

CORRECTIVE MEASURES TAKEN (Reference Problem Identification Report No.): ____________________________________________

RETESTING LOCATION: ____________________________________________

SUGGESTED METHOD OF MINIMIZING RE-OCCURRENCE: ____________________________________________

SUGGESTED CORRECTIVE MEASURES: ____________________________________________

APPROVALS:

QA ENGINEER: ____________________________________________

PROJECT MANAGER: ____________________________________________

Distribution: 1. Project Manager  
2. Field Office  
3. File  
4. Owner  
QA Personnel 
Signature: ________________________________
## Appendix 4. List of Compounds of Interest with Methods of Analysis and Specified Reporting Limits

<table>
<thead>
<tr>
<th>VOC TCL</th>
<th>SVOC TCL</th>
<th>PCBS (AROCLOR)</th>
<th>PESTICIDES</th>
<th>HERBICIDES</th>
<th>TAL METALS (DISSOLVED &amp; TOTAL)</th>
<th>CATION &amp; ANIONS</th>
<th>Per- and Polyfluoroalkyl Substances (PFAS) &amp; Radionuclides</th>
</tr>
</thead>
<tbody>
<tr>
<td>METHOD 8260B</td>
<td>METHOD 8270E</td>
<td>METHOD 8082A</td>
<td>METHOD 8081B</td>
<td>METHOD 8151A</td>
<td>METHOD 200.7</td>
<td>Method Varies [specified in bracket]</td>
<td>METHOD 1633 (PFAS)*, HASL-300 (Uranium/Thorium), 903.1/904.0 (Radium)</td>
</tr>
<tr>
<td>Dichlorodifluoromethane (0.5 ug/L)</td>
<td>Benzaldehyde (5 ug/L)</td>
<td>Arochlor-1016 (1 ug/L)</td>
<td>alpha-BHC (0.05 ug/L)</td>
<td>2,4-D (1 ug/L)</td>
<td>Aluminum (200 ug/L)</td>
<td>Ammonium [use most current method]</td>
<td>Uranium (1.0 pCi/L)</td>
</tr>
<tr>
<td>Chloromethane (0.5 ug/L)</td>
<td>Phenol (5 ug/L)</td>
<td>Arochlor-1221 (1 ug/L)</td>
<td>beta-BHC (0.05 ug/L)</td>
<td>2,4,5-D (1 ug/L)</td>
<td>Antimony (60 ug/L)</td>
<td>Chloride [SM 4500]</td>
<td>Thorium (1.0 pCi/L)</td>
</tr>
<tr>
<td>Vinyl chloride (0.5 ug/L)</td>
<td>Bis-(2-chloroethyl) ether (5 ug/L)</td>
<td>Arochlor-1232 (1 ug/L)</td>
<td>delta-BHC (0.05 ug/L)</td>
<td>2,4,5-TP (Silvex) (1 ug/L)</td>
<td>Arsenic (10 ug/L)</td>
<td>Bromide (0.5 mg/L) [Method 300.1]</td>
<td>Radium 228/226 (1.0 pCi/L)</td>
</tr>
<tr>
<td>Bromomethane (0.5 ug/L)</td>
<td>2-Chlorophenol (5 ug/L)</td>
<td>Arochlor-1242 (1 ug/L)</td>
<td>gamma-BHC (0.05 ug/L)</td>
<td>Dichlorprop (1 ug/L)</td>
<td>Barium (200 ug/L)</td>
<td>Nitrates/Nitrates (0.2 mg/L) [SM4500]</td>
<td>1,4-Dioxane (0.35 ug/L)</td>
</tr>
<tr>
<td>Chloroethane (0.5 ug/L)</td>
<td>2-Methylpropenyl (5 ug/L)</td>
<td>Arochlor-1248 (1 ug/L)</td>
<td>Heptachlor (0.05 ug/L)</td>
<td>Dalapon (1 ug/L)</td>
<td>Beryllium (0.5 ug/L)</td>
<td>Total Nitrogen [TKN EPA 351.2]</td>
<td>Perfluorobutanesulfonic acid (2 ng/L)</td>
</tr>
<tr>
<td>Chlorodifluoromethane (0.5 ug/L)</td>
<td>2,2’-Oxybis (1-chloropropane) (5 ug/L)</td>
<td>Arochlor-1254 (1 ug/L)</td>
<td>Aldrin (0.05 ug/L)</td>
<td>Dicamba (1 ug/L)</td>
<td>Cadmium (5 ug/L)</td>
<td>Sulphide [SM 3500]</td>
<td>Perfluoropentanesulfonic acid (2 ng/L)</td>
</tr>
<tr>
<td>1,1-Dichloroethene (0.5 ug/L)</td>
<td>Acetophenone (5 ug/L)</td>
<td>Arochlor-1260 (1 ug/L)</td>
<td>Heptachlor epoxide (0.05 ug/L)</td>
<td>Dichloroprop (1 ug/L)</td>
<td>Calcium (5000 ug/L)</td>
<td>Sulfate (0.5 mg/L) [Method 375.2]</td>
<td>Perfluorohexanesulfonic acid (2 ng/L)</td>
</tr>
<tr>
<td>1,1,2-Trichloro-1,2,2-trifluoroethane (0.5 ug/L)</td>
<td>4-Methylpentenol (5 ug/L)</td>
<td>Arochlor-1262 (1 ug/L)</td>
<td>Endosulfan I (0.05 ug/L)</td>
<td>Dimethoate (1 ug/L)</td>
<td>Chromium (10 ug/L)</td>
<td>Phosphate [use most current method]</td>
<td>Perfluorohexanesulfonic acid (2 ng/L)</td>
</tr>
<tr>
<td>Acetone (0.5 ug/L)</td>
<td>N-Nitroso-di-n-propylamine (5 ug/L)</td>
<td>Arochlor-1268 (1 ug/L)</td>
<td>Dieldrin (0.1 ug/L)</td>
<td>MCPA (1 ug/L)</td>
<td>Cobalt (50 ug/L)</td>
<td>Iodide [SM 3500]</td>
<td>Perfluorooctanesulfonic acid (2 ng/L)</td>
</tr>
<tr>
<td>Carbon disulfide (0.5 ug/L)</td>
<td>Hexachloroethane (5 ug/L)</td>
<td></td>
<td>4,4'-DDE (0.1 ug/L)</td>
<td>MCPP (1 ug/L)</td>
<td>Copper (25 ug/L)</td>
<td>Carbonate [use most current method]</td>
<td>Perfluorononanesulfonic acid (2 ng/L)</td>
</tr>
<tr>
<td>Methyl acetate (0.5 ug/L)</td>
<td>Nitrobenzene (5 ug/L)</td>
<td>Endrin (0.1 ug/L)</td>
<td>4-Nitrophenol (1 ug/L)</td>
<td>Iron (100 ug/L)</td>
<td>Bi-Carbonate [use most current method]</td>
<td>Perfluorodecanesulfonic acid (2 ng/L)</td>
<td></td>
</tr>
<tr>
<td>Methylene chloride (0.5 ug/L)</td>
<td>Isophorone (5 ug/L)</td>
<td>Endosulfan II (0.1 ug/L)</td>
<td>Pentachlorophenol (1 ug/L)</td>
<td>Lead (10 ug/L)</td>
<td>Fluoride (0.2 mg/L) [SM 4500]</td>
<td>Perfluorodecanesulfonic acid (2 ng/L)</td>
<td></td>
</tr>
<tr>
<td>Trans-1,2-Dichloroethene (0.5 ug/L)</td>
<td>2-Nitrophenol (5 ug/L)</td>
<td></td>
<td>4,4'-DDD (0.1 ug/L)</td>
<td></td>
<td>Magnesium (5000 ug/L)</td>
<td></td>
<td>Perfluorobutanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>Methyl tert-butyl ether (0.5 ug/L)</td>
<td>2,4-Dimethylenephenol (5 ug/L)</td>
<td></td>
<td>Endosulfan sulfate (0.1 ug/L)</td>
<td></td>
<td>Manganese (15 ug/L)</td>
<td></td>
<td>Perfluoropentanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>1,1-Dichloroethane (0.5 ug/L)</td>
<td>Bis (2-chloroethoxy) methane (5 ug/L)</td>
<td></td>
<td>4,4’-DOT (0.1 ug/L)</td>
<td></td>
<td>Mercury (0.2 ug/L)</td>
<td></td>
<td>Perfluorohexanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>cis-1,2-Dichloroethene (0.5 ug/L)</td>
<td>2,4-Dichlorophenol (5 ug/L)</td>
<td></td>
<td>Methoxychlor (0.5 ug/L)</td>
<td></td>
<td>Nickel (40 ug/L)</td>
<td></td>
<td>Perfluorooctanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>2-Butanone (Methyl ethyl ketone) (0.5 ug/L)</td>
<td>Naphthalene (5 ug/L)</td>
<td>Endrin ketone (0.1 ug/L)</td>
<td></td>
<td></td>
<td>Potassium (5000 ug/L)</td>
<td></td>
<td>Perfluorooctanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>Bromochloromethane (0.5 ug/L)</td>
<td>4-Chlororantline (5 ug/L)</td>
<td>Endrin aldehyde (0.1 ug/L)</td>
<td></td>
<td></td>
<td>Selenium (35 ug/L)</td>
<td></td>
<td>Perfluorooctanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>Chloroform (0.5 ug/L)</td>
<td>Hexachlorobutadiene (5 ug/L)</td>
<td></td>
<td>alpha-Chlordane (0.5 ug/L)</td>
<td></td>
<td>Silver (10 ug/L)</td>
<td></td>
<td>Perfluorobenzoic acid (2 ng/L)</td>
</tr>
<tr>
<td>VOC TCL</td>
<td>SVOC TCL</td>
<td>PCBS (AROCLOR)</td>
<td>PESTICIDES</td>
<td>HERBICIDES</td>
<td>TAL METALS (DISSOLVED &amp; TOTAL)</td>
<td>CATION &amp; ANIONS</td>
<td>Per- and Polyfluoroalkyl Substances (PFAS) &amp; Radionuclides</td>
</tr>
<tr>
<td>---------</td>
<td>----------</td>
<td>----------------</td>
<td>-------------</td>
<td>------------</td>
<td>-------------------------------</td>
<td>----------------</td>
<td>--------------------------------------------------------</td>
</tr>
<tr>
<td>1,1,1-trichloroethane (0.5 ug/L)</td>
<td>Caprolactam (5 ug/L)</td>
<td>gamma-Chlordane (0.5 ug/L)</td>
<td>Sodium (5000 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td>Perfluoroundecanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>cyclohexane (0.5 ug/L)</td>
<td>4-Chloro-3-methylphenol (5 ug/L)</td>
<td></td>
<td>Toxaphene (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td>Perfluorodecanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>carbon tetrachloride (0.5 ug/L)</td>
<td>2-Methynaphthalene (5 ug/L)</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>Perfluorotridecanoic acid (2 ng/L)</td>
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<tr>
<td>benzene (0.5 ug/L)</td>
<td>Hexachlorocyclopentadiene (5 ug/L)</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>Perfluorotetradecanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>1,2-dichloroethane (0.5 ug/L)</td>
<td>2,4,6-Trichlorophenol (5 ug/L)</td>
<td></td>
<td></td>
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<td>Hexafluoropropylene oxide dimer (2 ng/L)</td>
</tr>
<tr>
<td>trichloroethene (0.5 ug/L)</td>
<td>2,4,5-Trichlorophenol (5 ug/L)</td>
<td></td>
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<td>4,8-Dioxa-3H-perfluoronoanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>methylcyclohexane (0.5 ug/L)</td>
<td>1,1'-Biphenyl (5 ug/L)</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td>Perfluoro-3-methoxypropanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>1,2-dichloropropane (0.5 ug/L)</td>
<td>2-Chloronaphthalene (5 ug/L)</td>
<td></td>
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<td></td>
<td></td>
<td>Perfluoro-4-methoxybutanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>bromodichloromethane (0.5 ug/L)</td>
<td>2-Nitroaniline (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Nonafluor-3,6-dioxaheptanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>cis-1,3-dichloropropene (0.5 ug/L)</td>
<td>Dimethylphthalate (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4:2 Fluorotelomer sulfonic acid (2 ng/L)</td>
</tr>
<tr>
<td>4-methyl-2-pentanone (0.5 ug/L)</td>
<td>2,6-Dinitrotoluene (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>6:2 Fluorotelomer sulfonic acid (2 ng/L)</td>
</tr>
<tr>
<td>toluene (0.5 ug/L)</td>
<td>Acenaphthylene (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>8:2 Fluorotelomer sulfonic acid (2 ng/L)</td>
</tr>
<tr>
<td>trans-1,3-dichloropropene (0.5 ug/L)</td>
<td>3-Nitroaniline (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3:3 Fluorotelomer carboxylic acid (2 ng/L)</td>
</tr>
<tr>
<td>1,1,2-trichloroethane (0.5 ug/L)</td>
<td>Acenaphthene (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5:3 Fluorotelomer carboxylic acid (2 ng/L)</td>
</tr>
<tr>
<td>tetrachloroethene (0.5 ug/L)</td>
<td>2,4-Dinitrophenol (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>7:3 Fluorotelomer carboxylic acid (2 ng/L)</td>
</tr>
<tr>
<td>2-hexanone (0.5 ug/L)</td>
<td>4-Nitrophenol (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Perfluorooctane sulfonamide (2 ng/L)</td>
</tr>
<tr>
<td>Dibromochloromethane (0.5 ug/L)</td>
<td>Dibenzo furan (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>N-methylperfluorooctane sulfonamide (2 ng/L)</td>
</tr>
<tr>
<td>1,2-dibromomethane (0.5 ug/L)</td>
<td>2,4-Dinitrotoluene (5 ug/L)</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>N-ethylperfluorooctane sulfonamide (2 ng/L)</td>
</tr>
<tr>
<td>chlorobenzene (0.5 ug/L)</td>
<td>Diethylphthalate (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>N-ethylperfluorooctane sulfonamidoacetic acid (2 ng/L)</td>
</tr>
<tr>
<td>ethylbenzene (0.5 ug/L)</td>
<td>Fluorene (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>N-ethylperfluorooctane sulfonamidoacetic acid (2 ng/L)</td>
</tr>
<tr>
<td>xylenes (total) (1.5 ug/L)</td>
<td>4-Chlorophenyl-phenyl ether (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>N-methylperfluorooctane sulfonamidoethanol (2 ng/L)</td>
</tr>
<tr>
<td>styrene (0.5 ug/L)</td>
<td>4-Nitroaniline (5 ug/L)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>N-ethylperfluorooctane sulfonamidoethanol (2 ng/L)</td>
</tr>
<tr>
<td>bromoform (0.5 ug/L)</td>
<td>4,6-Dinitro-2-methylphenol (5 ug/L)</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td>9-Chlorohexadecafluoro-3-oxanone-1-sulfonic acid (F-53B Major) (2 ng/L)</td>
</tr>
<tr>
<td>isopropylbenzene (0.5 ug/L)</td>
<td>N-Nitrosodiphenylamine (5 ug/L)</td>
<td></td>
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<td></td>
<td></td>
<td>11-Chloroicosasfluoro-3-oxadecane-1-sulfonic acid (F-53B Minor) (2 ng/L)</td>
</tr>
<tr>
<td>VOC TCL</td>
<td>SVOC TCL</td>
<td>PCBS (AROCLOR)</td>
<td>PESTICIDES</td>
<td>HERBICIDES</td>
<td>TAL METALS (DISSOLVED &amp; TOTAL)</td>
<td>CATION &amp; ANIONS</td>
<td>Per- and Polyfluoralkyl Substances (PFAS) &amp; Radionuclides</td>
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</tr>
<tr>
<td>1,1,2,2-tetrachloroethane (0.5 ug/L)</td>
<td>1,2,4,5-Tetrachlorobenzene (5 ug/L)</td>
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<td></td>
<td></td>
<td></td>
<td>Perfluorooctanoic acid (2 ng/L)</td>
</tr>
<tr>
<td>1,3-dichlorobenzene (0.5 ug/L)</td>
<td>4-Bromophenyl-phenylether (5 ug/L)</td>
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</tr>
<tr>
<td>1,4-dichlorobenzene (0.5 ug/L)</td>
<td>Hexachlorobenzene (5 ug/L)</td>
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<tr>
<td>1,2-dichlorobenzene (0.5 ug/L)</td>
<td>Atrazine (5 ug/L)</td>
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<tr>
<td>1,2-dibromo-3-chloropropane (0.5 ug/L)</td>
<td>Pentachlorophenol</td>
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<tr>
<td>1,2,4-trichlorobenzene (0.5 ug/L)</td>
<td>Phenanthrene (5 ug/L)</td>
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<tr>
<td>1,2,3-trichlorobenzene (0.5 ug/L)</td>
<td>Anthracene (5 ug/L)</td>
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<td></td>
<td></td>
<td>Perfluoro(2-ethoxyethane) sulfonic acid (2 ng/L)</td>
</tr>
<tr>
<td>1,1,2,2-tetrachloroethane (0.5 ug/L)</td>
<td>1,2,4,5-Tetrachlorobenzene (5 ug/L)</td>
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<tr>
<td>1,3-dichlorobenzene (0.5 ug/L)</td>
<td>4-Bromophenyl-phenylether (5 ug/L)</td>
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<tr>
<td>1,4-dichlorobenzene (0.5 ug/L)</td>
<td>Hexachlorobenzene (5 ug/L)</td>
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<tr>
<td>1,2-dichlorobenzene (0.5 ug/L)</td>
<td>Atrazine (5 ug/L)</td>
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<tr>
<td>1,2-dibromo-3-chloropropane (0.5 ug/L)</td>
<td>Pentachlorophenol</td>
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<tr>
<td>1,2,4-trichlorobenzene (0.5 ug/L)</td>
<td>Phenanthrene (5 ug/L)</td>
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<tr>
<td>1,2,3-trichlorobenzene (0.5 ug/L)</td>
<td>Anthracene (5 ug/L)</td>
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<td></td>
<td></td>
<td>Perfluoro(2-ethoxyethane) sulfonic acid (2 ng/L)</td>
</tr>
</tbody>
</table>

*The analytic method, minimum reporting limits, and list of compounds for PFAS analysis should be consistent with the latest DER Guidance (link to PFAS webpage): Per- and Polyfluoralkyl Substances (PFAS) - NYS Dept. of Environmental Conservation Source: EPA Contract Laboratory Program Statement of Work for Inorganics Analysis, Multi-Media, Multi-Concentration EPA Contract Laboratory Program Statement of Work for Organic Analysis, Multi-Media, Multi-Concentration*