

**SUBJECT**

RACER Pontiac North Campus Proposed Storm Sewer Sampling Work Plan

**TO**

Jennifer Stanhope  
United States Environmental Protection Agency (USEPA)

**DATE**

December 19, 2024

**DEPARTMENT**

Environment

**PROJECT NUMBER**

30214041

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This scope of work (Scope) describes the methods and approach for per- and polyfluoroalkyl substances (PFAS) storm sewer sampling to assess the presence or absence of PFAS downgradient of the Revitalizing Auto Communities Environmental Response Trust (RACER) Pontiac North Campus properties (Site) located in Pontiac, Michigan (**Figure 1**). This Scope was prepared in response to the United States Environmental Protection Agency (USEPA) February 27, 2024, request for storm water sampling near monitoring well MWW1-06 and the recommendations included in the *PFAS Sampling Summary*, submitted to the USEPA on July 12, 2024.

The objective of the additional work is as follows:

- Assess the presence/absence of PFAS relative to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) groundwater surface water interface (GSI) criteria in an off-site storm sewer downgradient of the Site.

The proposed Scope includes stormwater sampling of a downgradient manhole to evaluate PFAS concentrations in off-site stormwater. The stormwater sampling location is shown on **Figure 1** and is located downgradient of contributing storm sewers that receive runoff from current or former RACER properties, Montcalm Street right-of-way (ROW) and adjacent properties, and the Saginaw ROW including the Pontiac School Board property. Note that a detection of PFAS in the sample does not necessarily imply that PFAS is from the former General Motors (GM) operations at the current or former RACER properties. There may be other contributing sources that discharge to the storm system and/or detections related to a ubiquitous background condition common to public sewers.

## Sampling Procedure

The proposed stormwater sampling will be completed south of the site along Saginaw Avenue at the structure just upgradient of an outfall to Harris Lake. The proposed sampling location is shown on **Figure 1**, which has been updated based on historical GM maps and input from the City of Pontiac. Stormwater samples will be collected during a dry period to best reflect baseflow conditions. Sampling will only occur if there is flowing water within the sewer and after a minimum period of three days with less than 0.1-inch of cumulative precipitation. Outfalls near Harris Lake (i.e., Outfalls 001 and 003) have been noted as dry during previous surveys not preceded by a rain event indicating that groundwater discharge to these sewers is minimal.

At the Saginaw Street manhole location shown on **Figure 1**, a grab sample will be collected using a peristaltic pump. The pump tubing will be weighted at one end and lower into the water taking care not to stir up sediment. All sampling equipment and materials will be PFAS-free and samples will be collected in accordance with the

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attached PFAS sampling TGI (**Attachment 1**). The sample will be analyzed by LC-MS/MS with isotope dilution by modified USEPA Method 537M. The modified method includes analysis of 28 PFAS, including perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) and the five other PFAS for which EGLE has a Part 201 GSI Criteria, as well as the six compounds with USEPA Maximum Contaminant Levels (MCLs). The laboratory analytical report will be validated by Arcadis staff not associated with the sample collection and data will be reviewed in accordance with USEPA National Functional Guidelines for Organic Superfund Methods Data Review, EPA-540-R-20-005 (November 2020), with reference to the historical USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review, OSWER 9240.1-05A-P, October 1999, as appropriate.

The results of the sampling will be reviewed with USEPA during an update call and provided to the USEPA as a brief data summary report.

Enc.

Figure 1 – Proposed Storm Sewer Sampling

Attachment 1 – Arcadis PFAS Sampling TGI



- LEGEND**
- PROPOSED LOCATION FOR SAMPLING
  - BULKHEAD LOCATION
  - ▲ EXISTING MONITORING WELL
  - ▲ EXISTING TEMPORARY MONITORING WELL
  - SEEP VAULT
  - OUTFALL LOCATION
  - ⊗ STORM
  - APPROXIMATE LOCATION OF STORM SEWER LINES

STORM SEWER SOURCE: CITY OF PONTIAC, MICHIGAN, DIVISION OF PUBLIC WORKS AND SERVICE, DIVISION OF SANITARY ENGINEERING. SEWERAGE ATLAS SHEETS NUMBER 36, 44, 52 AND 53 DATED 1930



RACER TRUST  
PONTIAC NORTH CAMPUS  
PONTIAC, MICHIGAN

**PROPOSED STORM SEWER SAMPLING**



CITY: NOVI, MI DIV: ENV DB: TRY PIC: PM: TR: PROJECT NUMBER: COORDINATE SYSTEM: NAD 1983 StatePlane Michigan South FIPS 2113 Feet Intl  
 D:\GIS\Project Files\MotorsLiquidationCompany\PontiacNorthCampus\Documents\Former\_Fiero\_Property\SiteInvestigation\_2023\MonitoringPlan\_2024\MonitoringPlan\_2024.aprx Layout: Racer\_PNC\_SewerLayout\_WaterTable\_Analytical\_B PLOTTED: 11/26/2024 1:54 PM BY: TY:arborough

# Attachment 1

# TGI – Per- and Polyfluoroalkyl Substances (PFAS) Field Sampling Guide

Rev: 10

Rev Date: January 26, 2022

## Version Control

Issue	Revision No.	Date Issued	Page No.	Description	Reviewed By
	0	April 27, 2017	All	Initial Release	Erica Kalve Erika Houtz Sue Tauro
	1	June 19, 2018	1 through 4 and 17	Updated Information on Sampling Materials	Erica Kalve Erika Houtz
	2	October 15, 2018	6 to 16	Minor updates on laboratory elements, updates to decontamination procedures, and clarification on equipment and reagent blank collection	Erika Houtz Erica Kalve
	3	December 17, 2018	4, 6, 17	Removed Sharpies from acceptable field writing implements; Changed language in Section 3.2 and Section 10.5 to provide stricter guidance for DoD projects.	Erika Houtz, Erica Kalve
	4	March 26, 2019	4,5	Removed Citranox from acceptable Decon solutions in Table 1a, added all fluoropolymer containing materials to prohibited items in Table 1b. Made a correction that Liquinox contains trace levels of 1,4 Dioxane, not Alconox.	Erika Houtz
	5	October 16, 2020	14	Added Air Force preference to sample surface water at surface for Air Force investigations.	Erika Houtz

6	March 23, 2021	4, 5, 7, 12, 13, 14, 15, 16, 17	Made clarifications that fine/ultra-fine point Sharpies are allowed. Referenced 2018 MDEQ sampling guidance. Made updates to 'After Sample Collection' in Section 7.	Kevin Engle
7	April 18, 2021	All	Changed title from Poly- and Perfluoroalkyl Substances to <b>“Per- and Polyfluoroalkyl Substances”</b> and changed PFASs to PFAS.	Rosario Varrella, Erika Houtz
8	May 4, 2021	12, 13, 15, 16	Clarified that sample containers should have an HDPE lined screw cap and that LDPE plastic sheeting should be used.	Kevin Engle, Erika Houtz
9	October 20, 2021	Note that numbers have shifted one page forward relative to prior versions. 5, 7, 9-12, 15, 16, 18-25.	Specific acceptable sunscreen and insect repellent brands were added to Table 1. Clarified language regarding footwear and H&S trainings. Laboratories section and Section 10.5 was updated to reflect new laboratory names and an updated version of the QSM. Sections 5 and 6 were updated to provide clearer language on health and safety protocols for sunscreen, insect repellent, and rain events. Added language to specify decontamination of reusable equipment prior to initial use in Section 7.1. Section 8 on Waste Management was updated to state that	Kevin Engle, Erika Houtz


waste storage and disposal should be determined in the site specific workplan. Section 9 was updated to include Rite in the Rain® notebooks as approved for PFAS sampling. Changed the term “sample port” to “sample location” when describing where to place plastic sheeting. Section 10.1 was updated to indicate an equipment blank can be collected for unvetted hazard controls that contact a sample. References were updated to include the newer version of the DoD QSM, MDEQ Sampling Guidance, and California State Water Board PFAS Sampling Guidance.

10	January 26, 2022	Various, Section 7	<p>TGI formatted to comply with new QMS TGI template and Arcadis brand compliance.</p> <p>Indicated to avoid use of anti-fog spray on safety glasses due to possible presence of PFAS.</p>
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## Approval Signatures

Prepared by:

1/26/2022



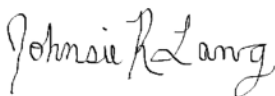
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Kevin Engle, PG Geologist (Preparer)

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Date

Reviewed by:



1/26/2022

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Johnnie Lang, PhD (Subject Matter Expert)

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Date

## 1 Introduction

This document is intended to provide guidance to field staff sampling for Per- and Polyfluoroalkyl Substances (PFAS). The content in this document describes the intended use, scope and application, personnel qualifications, equipment, cautions, health and safety considerations, procedures, waste management, data recording and management, and quality assurance of PFAS sampling.

## 2 Intended Use and Responsibilities

This document describes general and/or specific procedures, methods, actions, steps, and considerations to be used and observed by Arcadis staff when performing work, tasks, or actions under the scope and relevancy of this document. This document may describe expectations, requirements, guidance, recommendations, and/or instructions pertinent to the service, work task, or activity it covers.

It is the responsibility of the Arcadis Certified Project Manager (CPM) to provide this document to the persons conducting services that fall under the scope and purpose of this procedure, instruction, and/or guidance. The Arcadis CPM will also ensure that the persons conducting the work falling under this document are appropriately trained and familiar with its content. The persons conducting the work under this document are required to meet the minimum competency requirements outlined herein, and inquire to the CPM regarding any questions, misunderstanding, or discrepancy related to the work under this document.

This document is not considered to be all inclusive nor does it apply to all projects. It is the CPM's responsibility to determine the proper scope and personnel required for each project. There may be project- and/or client- and/or state-specific requirements that may be more or less stringent than what is described herein. The CPM is responsible for informing Arcadis and/or Subcontractor personnel of omissions and/or deviations from this document that may be required for the project. In turn, project staff are required to inform the CPM if or when there is a deviation or omission from work performed as compared to what is described herein.

In following this document to execute the scope of work for a project, it may be necessary for staff to make professional judgment decisions to meet the project's scope of work based upon site conditions, staffing expertise, regulation-specific requirements, health and safety concerns, etc. Staff are required to consult with the CPM when or if a deviation or omission from this document is required that has not already been previously approved by the CPM. Upon approval by the CPM, the staff can perform the deviation or omission as confirmed by the CPM.

## 3 Scope and Application

The purpose of this Technical Guidance Instructions (TGI) is to provide guidance on field sampling to be used for **Per- and Polyfluoroalkyl Substances** (PFAS). This protocol was adapted from various sources including Arcadis Australia, Transport Canada, and the U.S Army Corp of Engineers (USACE) Omaha. In general, sampling techniques used for PFAS site characterization are consistent with conventional sampling techniques used in the environmental industry, but special consideration is made regarding PFAS-containing materials and cross-contamination potential. **Table 1a** provides a summary of materials that have been approved for site investigation; this list is expected to grow longer as industry experience increases. **Table 1b** provides a summary of field equipment and materials that have available testing information and/or industry knowledge regarding

PFAS cross-contamination potential, and it is recommended that these materials be prohibited for sample collection; for materials that are suspected of containing PFAS and/or to retain PFAS, these recommendations are considered preliminary and subject to change. Further discussion of approved and prohibited materials is found throughout this document.

**Table 1a: Summary of Acceptable Sampling Equipment and Materials for PFAS Site Investigations**

Sampling Materials	Additional Considerations	References
<b><i>Water Sampling Materials</i></b>		
High density polyethylene (HDPE) or silicone tubing materials	--	DER 2016; USACE 2016; NHDES 2016; MassDEP 2017
HDPE HydraSleeves™	Low density polyethylene (LDPE) HydraSleeves™ are not recommended	USACE 2016; MassDEP 2017
<b><i>Drilling and Soil Sampling Materials</i></b>		
PFAS-free drilling fluids	--	DER 2016
PFAS-free makeup water	Confirm PFAS-free water source via laboratory analysis prior to investigation	--
Acetate liners	For use in soil sampling	USACE 2016
<b><i>Sample Containers and Storage</i></b>		
HDPE sample containers with HDPE lined lids for soil and water samples	Laboratory should provide; whole bottle analysis of aqueous samples combined with a solvent rinse of bottle is recommended	DER 2016, MassDEP 2017
Ice contained in plastic (polyethylene) bags (double bagged)	--	DER 2016; USACE 2016; NHDES 2016; MassDEP 2017
<b><i>Field Documentation</i></b>		
Ball point pens	--	MassDEP 2017
Standard paper and paper labels	--	DER 2016; USACE 2016; NHDES 2016; MassDEP 2017
Fine/Ultra-Fine point Sharpies®	Larger point Sharpies® should be avoided.	MDEQ 2018
<b><i>Decontamination</i></b>		
Water-only decontamination	Confirm PFAS-free water source via laboratory analysis prior to investigation	DER 2016

Sampling Materials	Additional Considerations	References
Alconox® or Liquinox® followed by deionized water or PFAS-free water rinse	Liquinox® known to contain trace levels of 1,4-dioxane	NHDES 2016; USACE 2016; MassDEP 2017
Methanol, isopropanol, or acetone	Special health and safety precautions are necessary	UNEP 2015; USACE 2016
<b>Sun and Biological Protection</b>		
OFF Deep Woods, Sawyer Permethrin	Apply >10 m away from sampling area	MDEQ 2018
Banana Boat, Coppertone, Neutrogena, Meijer, and L'Oreal Sunscreens	Apply >10 m away from sampling area	MDEQ 2018

Note: This list is considered preliminary and additional materials may be added as additional information becomes available. Project teams are expected to follow a methodical evaluation process of materials to be used and confirm acceptance prior to implementation of field activities.

**Table 1b: Summary of Sampling Equipment and Materials Not Recommended for PFAS Site Investigations.**

Sampling Materials	Known PFAS-Containing Materials	Suspected PFAS-Containing Materials	Materials with Potential to Retain PFAS	References
<b>Water Sampling Materials</b>				
Teflon®, PTFE-containing or other fluoropolymer coated or containing field equipment (e.g., tubing, bailers, liners, tape, plumbing paste, pump parts)	x			DER 2016; USACE 2016; NHDES 2016; MassDEP 2017
Passive diffusion bags			x	MassDEP 2017
LDPE HydraSleeves™			x	USACE 2016; MassDEP 2017
Water particle filters			x	MassDEP 2017
<b>Drilling and Soil Sampling Materials</b>				
Aluminum foil			x	DER 2016; USACE 2016; NHDES 2016; MassDEP 2017
Drilling fluid containing PFAS	x	x		DER 2016
<b>Sample Containers and Storage</b>				
Glass sample containers with lined lids			x	DER 2016; USACE 2016; NHDES 2016; MassDEP 2017

Sampling Materials	Known PFAS-Containing Materials	Suspected PFAS-Containing Materials	Materials with Potential to Retain PFAS	References
LDPE containers and lined lids			x	USACE 2016
Teflon® or PTFE- lined lids on containers (e.g., sample containers, rinsate water storage containers)	x			DER 2016; USACE 2016; NHDES 2016; MassDEP 2017
Reusable chemical or gel ice packs (e.g., BlueIce®)		x		DER 2016; USACE 2016; NHDES 2016; MassDEP 2017
<b>Field Documentation</b>				
Self-sticking notes and similar office products (e.g., 3M Post-it-notes)		x		DER 2016; USACE 2016; NHDES 2016; MassDEP 2017
Waterproof paper, notebooks, and labels	x			DER 2016, MassDEP 2017
Markers		x		NHDES 2016
<b>Decontamination</b>				
[Some] detergents and decontamination solutions (e.g., Decon 90® Decontamination Solution)	x	x		DER 2016; NHDES 2016; MassDEP 2017

**Note:** For materials that are suspected of containing PFAS, or have the potential to retain PFAS, project specific considerations may provide adequate justification for use during the field event. For example, further evaluation may be conducted in the form of pre-field equipment blank sample analysis.

Given the extremely low detection limits associated with PFAS analysis and the many potential sources of trace levels of PFAS, field personnel are advised to err on the side of caution by strictly following these protocols, frequently replacing nitrile gloves, and rinsing field equipment to help mitigate the potential for false detections of PFAS. A summary of other specific items related to field sampling for PFAS are discussed in the sections below.

This TGI applies to all Arcadis and subcontractor personnel involved in field sampling for PFAS.

## 4 Personnel Qualifications

### 4.1 Sampling Personnel

Field personnel must have current health and safety training, including 40-hour HAZWOPER training, up to date 8-hour refresher, site supervisor training, and site-specific training, as needed. In addition, field personnel will be versed in the other relevant SOPs (e.g., low flow sampling) and will possess the skills and experience necessary

to successfully complete the desired field work. The site Health and Safety Plan (HASP) and other documents will identify any other training requirements such as site-specific safety training or access control requirements.

## 4.2 Laboratories

These laboratories are example laboratories that could be used to analyze environmental media for PFAS, pending project approval:

- United States: Pace, SGS, Vista, ALS, and Eurofins
- Canada: AXYS-SGS and Bureau Veritas

Other laboratories may be used if they are appropriately accredited for PFAS analysis according to any project requirements. It is recommended that a laboratory is Environmental Laboratory Accreditation Program (ELAP)-accredited for PFAS analysis in accordance with the Department of Defense (DoD) Quality Systems Manual (QSM) 5.3 Table B-15 or any subsequent updates. **For all data collection efforts at DoD sites, PFAS data must be obtained using a method that is DoD ELAP-accredited under QSM 5.3 or later.**

## 5 Equipment List

The following equipment and materials must be available for sampling:

- Site plan of sampling locations, relevant work plan (or equivalent), and this TGI;
- Appropriate health and safety equipment, as specified in the site HASP;
- Dedicated plastic sheeting (preferably high-density polyethylene [HDPE]) or other clean surface to prevent sample contact with the ground;
- Conductivity/temperature/pH meter;
- Dissolved oxygen meter, oxidation reduction potential meter, and turbidity meter;
- Depth to water meter;
- If using low-flow groundwater sampling techniques, peristaltic pump (groundwater sampling)/bladder pump (with PFAS free bladder/ HDPE bladder), flow through cell, and accompanying HDPE and silicone tubing;
- Hydrasleeves™, if using Hydrasleeves™ for groundwater sampling;
- Metal trowel for soil samples; specialized soil/sediment sampling equipment as required;
- Brushes for scrubbing sampling equipment;
- Pens, pencils, and/or fine/ultra-fine point Sharpies® for writing;
- Clipboards, field binders, and field note pages that are not waterproof;
- Labeled sample bottles:
  - Water: HDPE bottles fitted with polypropylene screw cap only; some types of PFAS samples (primarily drinking water) may require preservative, which will be indicated by the laboratory conducting the analysis. The laboratory will specify the sample bottle volume.

- Soil and sediment: HDPE bottles fitted with polypropylene screw cap only; no preservatives. The laboratory will specify the sample bottle volume.
- If high concentrations of PFAS related to class B firefighting foams are expected, bring additional small vials to conduct field-based shaker tests for foaming;
- Ziploc® bags to hold ice and samples;
- Bottles containing “PFAS-free” water used for reagent blanks;
- Labeled, thoroughly decontaminated coolers for samples with ice; Blue ice is not permitted;
- Deionized or distilled water for initial decontamination rinsing;
- “PFAS-free” water provided by the laboratory for final decontamination rinsing;
- Methanol, isopropanol, or acetone if able to be brought safely to field site; especially important for decontamination during soil sampling;
- Alconox or Liquinox®;
- Packing and shipping materials;
- Groundwater and/or Sampling Log; and
- Chain-of-Custody (COC) Forms.

## 6 Cautions

### 6.1 Food Packaging

Some food packaging may be treated with PFAS-containing chemicals to prevent permeation of oil and water in the food outside of the packaging. To avoid potential food packaging-related PFAS contact:

- Do not bring any food outside of the field vehicles onsite and eat snacks and meals offsite.
- Wash hands after eating.
- Remove any field garments or outer layers prior to eating. Do not put them back on until done eating and hands are washed.

### 6.2 Field Gear

#### 6.2.1 Clothing

Many types of clothing are treated with PFAS for stain and water resistance, in particular outdoor performance wear under brand names such as Gore-Tex®. To avoid potential clothing-related PFAS contact:

- Do not wear any outdoor performance wear that is water or stain resistant, or appears to be. Err on the side of caution.

- Wear pre-laundered (multiple washings, i.e., 6+) clothing that is not stain resistant or waterproof (unless made from the materials listed in Section 5).
- Natural fabrics such as cotton are preferred. Synthetic fabrics may also be acceptable if there is no indication on the label that the fabric is water and stain resistant.
- Most importantly, avoid contacting your clothing with sampling equipment, bottles, and samples.

## 6.2.2 Personal Protective Equipment

### Safety Footwear

Some safety footwear has been treated to provide a degree of waterproofing and increased durability and may represent a source of trace PFAS. If at all possible, Gore-Tex footwear should not be worn and safety footwear without waterproofing should be worn; footwear that provides adequate safety from physical hazards is required and takes precedence over potential PFAS concerns. To avoid any PFAS cross contamination to samples from footwear:

- Do not contact your footwear with equipment, bottles, or samples in any way.
- Do not allow gloves used for sampling to come in contact with safety footwear.

### Nitrile Gloves

Wear disposable nitrile gloves at all times. Don a new pair of nitrile gloves **before** the following activities at each sample location:

- Decontamination of re-usable sampling equipment;
- Contact with sample bottles or “PFAS-free” water bottles;
- Insertion of anything into the sample ports (e.g., HDPE tubing); and
- Handling of any quality assurance/quality control (QA/QC) samples including field blanks and equipment blanks.

Don a new pair of nitrile gloves **after** the following activities:

- Handling of any non-dedicated sampling equipment;
- Contact with contaminated surfaces; or
- When judged necessary by field personnel.

## 6.3 Personal Hygiene

- Shower at night.
- Do not use personal care products after showering such as lotions, makeup, and perfumes, UNLESS medically necessary.
- Use sunscreen and insect repellent as necessary for health and safety, i.e., if sampling is to occur outdoors in direct sunlight and/or if insect hazards may be present. Specific products that are acceptable for PFAS

sampling are listed in Section 7.1.1. Apply sunscreen and insect repellent prior to initiating field sampling. If sunscreen and/or repellent need to be reapplied, ensure a safe distance away from the sampling locations and equipment (i.e., more than 10 meters (m) away). Wash hands after application and don new gloves following hand washing.

## 6.4 Visitors

Visitors to the site are asked to remain at least 10 m from sampling areas.

# 7 Health and Safety Considerations

## 7.1 Biological and Environmental Hazard Controls

### 7.1.1 Sunscreens and Insect Repellents

When site conditions warrant, insect repellent and sunscreen should be applied. Some insect repellents and sunscreen have been approved for PFAS sampling by individual states. According to Michigan Department of Environmental Quality (MDEQ; now known as Michigan Department of Environment, Great Lakes, and Energy [EGLE]), the products below are allowable (MDEQ 2018). Note that California State Water Quality Control Board's PFAS sampling guidance refers to MDEQ/EGLE's allowable list of sunscreens and insect repellents (California State Water Quality Control Board 2020).

#### Insect Repellents

- OFF Deep Woods
- Sawyer Permethrin

#### Sunscreen

- Banana Boat Sport Performance Sunscreen Lotion Broad Spectrum SPF 30
- Meijer Sunscreen Lotion Broad Spectrum SPF 30
- Neutrogena Ultra-Sheer Dry-Touch Sunscreen Broad Spectrum SPF 30
- Banana Boat for Men Triple Defense Continuous Spray Sunscreen SPF 30
- Banana Boat Sport Performance Coolzone Broad Spectrum SPF 30
- Banana Boat Sport Performance Sunscreen Lotion Broad Spectrum SPF 30
- Banana Boat Sport Performance Sunscreen Stick SPF 50
- Coppertone Sunscreen Lotion Ultra Guard Broad Spectrum SPF 50
- Coppertone Sport High-Performance AccuSpray Sunscreen SPF 30
- Coppertone Sunscreen Stick Kids SPF 55
- L'Oréal Silky Sheer Face Lotion 50+
- Meijer Clear Zinc Sunscreen Lotion Broad Spectrum SPF 15, 30 and 50
- Meijer Wet Skin Kids Sunscreen Continuous Spray Broad Spectrum SPF 70
- Neutrogena Beach Defense Water + Sun Barrier Lotion SPF 70
- Neutrogena Beach Defense Water + Sun Barrier Spray Broad Spectrum SPF 30
- Neutrogena Pure & Free Baby Sunscreen Broad Spectrum SPF 60+

Please plan for sampling events and purchase these products ahead of time. For any sunscreens and bug sprays, including those listed above, always follow these instructions for application:

- Insect repellents and sunscreen should be applied away from the work area prior to initiating sampling.
- When re-applying, stay at least 10 m away from the sampling locations and equipment.
- Wash hands after application and don new nitrile gloves.

### 7.1.2 Rain Event

Special care should be taken when rain is falling at the project site:

- Field sampling during extreme rainfall should be avoided if possible. If sampling needs to take place during a rain event (or other extreme weather condition), ensure the rain gear or other safety clothing is appropriate. For example, rain gear made from the following materials is allowable: polyurethane, PVC, wax coated fabrics, rubber/neoprene, uncoated Tyvek® (MDEQ 2018).
- If project timelines are tight, consider the use of a gazebo tent that can be erected over the top of the monitoring well to provide shelter from the rain. The canopy material is possibly a PFAS-treated surface and should be managed as such; therefore, wear gloves when moving the tent, change them immediately after moving the tent, and avoid further contact with the tent until all sampling activities have been finished and the team is ready to move on to the next site.

### 7.1.3 Other H&S Considerations

- ***If an unapproved or potentially suspect hazard control is needed for health and safety, apply or keep that control away from the samples, document its use in field notes, and, if it does contact a sample, take an equipment blank with that material.***
- The ability to safely access the surface water sampling locations must be verified before sampling.
- Field activities must be performed in accordance with the site HASP, a copy of which will be present onsite during such activities.
- Safety hazards associated with sampling surface water include fast-moving water, deep water, and steep slopes close to sampling sites. Use extreme caution when approaching sampling sites.
- If thunder or lightning is present, discontinue sampling and take cover until 30 minutes have passed after the last occurrence of thunder or lightning.
- Use caution when removing well caps as well may be under pressure, cap can dislodge forcefully and cause injury.
- Avoid the use of anti-fog sprays on glasses, which may contain PFAS. It's recommended to instead purchase pre-treated anti-fog safety glasses.

## 8 Procedure

### 8.1 Field Equipment Cleaning

Reusable field sampling equipment will require cleaning before initial use and between uses. For groundwater sampling, between uses, decontaminate the flow-through cell and any non-dedicated equipment (i.e., interface probe of depth to water meter) that comes into contact with well water. Trowels and other materials used to sample soil samples will also require decontamination, although dedicated, single use equipment such as liners should be used where possible.

After donning a new pair of nitrile gloves:

- Rinse sampling equipment with Alconox or Liquinox® cleaning solution; Scrub equipment with a plastic brush if needed;
- Rinse two times with distilled water or deionized water;
- Rinse one time with “PFAS-free” water or once with methanol/isopropanol/acetone, if it is available, and once with “PFAS-free” water; organic solvents are especially useful for decontaminating soil sampling equipment. If organic cleaning solvents cannot be brought to site, scrub equipment a second time after a single distilled or deionized water rinse, then rinse two times with distilled or deionized water and once with “PFAS-free” water (i.e., two scrubbing and four water rinsings total).
- Collect all rinsate in a sealed pail for disposal. Do not reuse decontamination solutions between sampling locations.

### 8.2 Borehole/Monitoring Well Development

If a drill rig is being used to drill for soil cores or to install monitoring wells, wear clean nitrile gloves before collecting each continuous soil sample. Additional requirements include the following:

- Verify in writing with the manufacturer that single-use liners used to collect each sample are made of a material that does not contain PFAS;
- Collect soil samples in laboratory-supplied HDPE bottles.
- Store the sample bottles in coolers and keep at a temperature of 0 to 6°C until transported to the laboratory.

#### 8.2.1 Well Condition Survey/ Water Level Monitoring

Using equipment that has been thoroughly decontaminated according to the procedures in Section 7.1, conduct the well condition surveys and water level monitoring:

- Conduct monitoring well inspections and record water levels.
- Use an interface probe to evaluate presence/absence of non-aqueous phase liquid (NAPL).
- Measure the depth to water from the top of the polyvinyl chloride (PVC) riser and the total depth of the well.
- Record information in the field notes.

## 8.2.2 Monitoring Well Development and Purging

Follow these requirements for monitoring well development and purging:

- Do not use Teflon™ tubing for purging or sample collection. HDPE tubing is acceptable.
- Do not re-use materials between wells. Upon completion of use, remove all disposable materials (such as HDPE and/or silicone tubing) and place in heavy duty garbage bags for disposal.
- During development of the well, create sufficient energy to agitate the water column and create flow reversals in the well screen, filter pack and formation to loosen fine-grained materials and draw them into the well. The pumping or bailing action should then draw all drilling fluids and fine-grained material out of the borehole and adjacent formation and then out of the well. Review the Arcadis Monitoring Well Development guidance (Arcadis 2010) for more detailed information.
- Follow the low-flow purge and sampling techniques per the U.S. Protection Agency's (EPA's) guidance document titled *Low Stress (Low Flow) purging and Sampling Procedure for the Collection of Ground Water Samples from Monitoring Wells* (2010) and ASTM's standard titled *Standard Practice for Low-Flow Purging and Sampling for Wells and Devices Used for Ground-Water Quality Investigations* (2002). Also available for review is the Arcadis Low-Flow Groundwater Purging and Sampling Procedures for Monitoring Wells (Arcadis 2011).
- To purge the well, if using HDPE tubing and a peristaltic pump, insert the end of the tubing to the approximate depth of the midpoint of the screened section of the monitoring wells. Measure the length of HDPE tubing to be inserted into each monitoring well and pre-cut it to approximate lengths (such as the previously measured arm span of a field technician) to avoid contact with any materials other than the monitoring well and peristaltic pump. Flow rates should be as low as can be reasonably achieved. Collect and appropriately dispose of purge water.
- Silicone tubing should direct the purge water through a flow-through cell for field parameter measurements of pH, conductivity, temperature, dissolved oxygen, and turbidity. Calibrate the instrument in the field prior to use. Decontaminate the instrument and flow-through cell at each monitoring well location before purging.
- Record field parameters in intervals (generally of 3-minute duration) to ensure purge water has cycled through the flow-through cell. Sample the wells after field parameter measurements indicate stabilization, which allows collection of representative formation water (generally acceptable standards are three consecutive pH readings to within  $\pm 0.1$  units, and three consecutive conductivity, temperature and dissolved oxygen measurements to within 3%). Turbidity must be monitored, but does not need to be used as a stabilization indicator of purge completion. Record field parameter measurements at each well. Drawdown should be monitored throughout the purge.
- If wells are suspected to be dewatering throughout the purge (i.e., reduced flow rate/difficulty pumping water or bubbles begin to come through the flow through cell), turn off the pump and allow the water level to recover for ½ hour, followed by sample collection. Document these activities in the field notes.

## 8.3 Sample Collection

Different laboratories may supply sample collection bottles of varying sizes depending on the type of media to be sampled.

### 8.3.1 Sample Containers

- Collect samples in HDPE bottles fitted with a HDPE lined (no Teflon™) screw cap.
- Complete bottle labels after the caps have been placed back on each bottle.
- Do not use glass bottles due to potential loss of analyte through adsorption. This is particularly important for aqueous samples.
- Review with analytical lab the sample size, sample container, etc. depending upon the type of PFAS analysis that is being requested.

### 8.3.2 Soil Sampling

#### Before Sample Collection

- Place LDPE plastic sheeting adjacent to the sample location for use as a clean work area, if conditions allow. Otherwise, prevent sampling equipment from contacting the ground or other surface that could compromise sample integrity.
- Trowels or drilling equipment that will come into contact with a sample should be decontaminated prior to sample collection, preferably with methanol/isopropanol/acetone;
- Don a new set of nitrile gloves. Do not use gloved hands to subsequently handle papers, pens, clothes, etc., before collecting samples.
- Use the HDPE bottles that are supplied by the laboratory. Make sure that the caps remain on the bottle until immediately prior to sample collection.

#### During Sample Collection

- Collect soil samples using a clean stainless-steel trowel or with single-use PFAS-free liners;
- Place soil samples in labeled HDPE bottles supplied by the laboratory.
- Note the time on the sample label.
- Collect any necessary duplicates/co-located samples and matrix spikes – verify with laboratory whether they need to be collected in separate sample bottles.
- Collect any necessary equipment blanks. The best timing to collect equipment blanks is immediately after the collection of a sample likely to contain high concentrations of PFAS, after the sampling equipment has been appropriately decontaminated.
- Collect any necessary field reagent blanks. This sample should be collected after field staff return from an offsite break (e.g., lunch) to capture any potential cross-contamination from field personnel.

### After Sample Collection

- Place each sample bottle in two sealed Ziploc® bags. Another brand of LDPE bag is acceptable.
- Record the label information and time of sampling in the field notes.
- Place soil sample bottles in coolers that are durable in transportation and keep the temperature between 0 and 6°C until transported to the laboratory. Do not use blue ice.

## 8.3.3 Groundwater Sampling

### Before Sample Collection

- Place LDPE plastic sheeting adjacent to the sample location for use as a clean work area, if conditions allow. Otherwise, prevent sampling equipment from contacting the ground or other surface that could compromise sample integrity.
- Don a new set of nitrile gloves. Do not use gloved hands to subsequently handle papers, pens, clothes, etc., before collecting samples.
- Use the labeled HDPE bottles that are supplied by the laboratory. Make sure that the caps remain on the bottle until immediately prior to sample collection.
- Measure depth to water and field parameters. Turbidity and the physical appearance of the purged water should be noted on the Groundwater Sampling Log.

### During Sample Collection

- Start groundwater sample collection upon stabilization of field parameters.
- If low-flow groundwater sampling techniques are being used, disconnect the silicone tubing from the flow-through cell, enabling collection of groundwater samples without passing through the cell.
- Hydrasleeves are also considered acceptable for sampling of PFAS in groundwater – consult the project manager to determine which technique should be used. In general, low flow sampling is preferable.
- Collect groundwater samples (to the neck of the bottle, some headspace is acceptable) from the dedicated sampling ports at the center of the well screen. While collecting the sample, make sure the bottle cap remains in the other hand of the sampler, until replaced on the bottle.
- To mitigate cross contamination, collect groundwater samples in a pre-determined order from least impacted to greater impacted based on previous analytical data or knowledge about past activities at the site. If no analytical data are available, samples are to be collected in the following order:
  1. First sample the upgradient well(s).
  2. Next, sample the well located furthest downgradient of the interpreted or known source.
  3. The remaining wells should be progressively sampled in order from downgradient to upgradient, such that the wells closest to the interpreted or known source are sampled last.
- NOTE: If high concentrations of PFAS related to class B firefighting foams are expected in a groundwater sample, conduct a Shaker test by collecting and shaking a small portion of the sample (~10 to 25 mL) on site in a small disposable vial. If foaming is noted within the sample, document the foaming when samples are

submitted for analysis; the 'shaker test' vial can then be disposed. This shaker test provides information about how each of the samples should be handled analytically.

- After collecting the sample, tightly screw on the polypropylene cap (snug, but not too tight). This will minimize leaking or cross contamination of the sample. Most PFAS, including all analytes measured by USEPA Method 537, are not volatile at environmental pH.
- Note the time on the sample label.
- Collect any necessary duplicates and matrix spikes. As the laboratory should be analyzing the entire aqueous sample rather than sub-sampling, separate bottles will be required for these samples.
- Collect any necessary equipment blanks. The best timing to collect equipment blanks is immediately after the collection of a sample likely to contain high concentrations of PFAS, after the sampling equipment has been appropriately decontaminated.
- Collect any necessary field reagent blanks. This sample should be collected after field staff return from an offsite break (e.g., lunch) to capture any potential cross-contamination from field personnel.
- Do not rinse PFAS sample bottles during sampling. Do not filter samples.

#### After Sample Collection

- Place each sample bottle in two sealed Ziploc® bags. Another brand of LDPE bag is acceptable.
- Record the label information and time of sampling in the field notes and COC. Note 'shake test' results if appropriate.
- Place groundwater samples in coolers that are durable in transportation and keep the temperature between 0 and 6°C until transported to the laboratory. **Do not use blue ice. Store PFAS samples in a separate cooler from other types of samples.**

Treat all disposable sampling materials as single use and dispose of them appropriately after sampling at each monitoring well.

### 8.3.4 Sediment Sampling

#### Before Sample Collection

- Place LDPE plastic sheeting adjacent to the sample location for use as a clean work area, if conditions allow. Otherwise, prevent sampling equipment from contacting the ground or other surface that could compromise sample integrity.
- Don a new set of nitrile gloves. Do not use gloved hands to subsequently handle papers, pens, clothes, etc., before collecting samples.
- Use the HDPE bottles that are supplied by the laboratory. Make sure that the caps remain on the bottle until immediately prior to sample collection.

#### During Sample Collection

- Where surface water samples and sediment samples are collected at the same location, collect surface water samples first to minimize siltation.

- Collect sediment samples either manually using a stainless-steel trowel or using a petite ponar grab sampler, depending on field conditions at each sampling location during sampling program.
- Collect sediment samples from the upper 10 cm of sediment.
- For a sample to be acceptable overlying, low turbidity water must be present.
- Decant the overlying water and use a stainless-steel trowel to collect only the upper 5 centimeters (cm) of sediment.
- Collect sediment samples directly into laboratory-supplied bottles that are suitable in both material and size.
- Do not overfill the sample bottle.
- Make sure that the sample does not contain vegetation, that the sediment is undisturbed, and that the sampler shows no signs of winnowing or leaking.
- Make sure bottle caps remain in the gloved hand of the sampler until sampling is complete and caps are replaced on the bottle.
- Note the time on the sample label.
- Collect any necessary duplicates and matrix spikes.
- Collect any necessary equipment blanks. The best timing to collect equipment blanks is immediately after the collection of a sample likely to contain high concentrations of PFAS, after the sampling equipment has been appropriately decontaminated.
- Collect any necessary field reagent blanks. This sample should be collected after field staff return from an offsite break (e.g., lunch) to capture any potential cross-contamination from field personnel.

#### **After Sample Collection**

- Place each sample bottle in two sealed Ziploc® bags. Another brand of LDPE bag is acceptable.
- Record the label information and time of sampling in the field notes.
- Place samples in coolers that are durable in transportation and keep the temperature between 0 and 6°C until transported to the laboratory. **Do not use blue ice. Store PFAS samples in a separate cooler from other types of samples.**
- Measure surface water pH, conductivity, temperature, and total dissolved solids (TDS) at each location **after** both surface water and sediment sampling is completed.

### **8.3.5 Surface Water Sampling**

#### **Before Sample Collection**

- Place LDPE plastic sheeting adjacent to the sample location for use as a clean work area, if conditions allow. Otherwise, prevent sampling equipment from contacting the ground or other surface that could compromise sample integrity.
- Don a new set of nitrile gloves. Do not use gloved hands to subsequently handle papers, pens, clothes, etc., before collecting samples.

- Use the HDPE bottles that are supplied by the laboratory. Make sure that the caps remain on the bottle until immediately prior to sample collection.

### **During Sample Collection**

- Avoid sampling the surface, in general.
- However, for Air Force investigations, collect samples from the water surface.
- Where surface water samples and sediment samples are collected at the same location, collect surface water samples first to minimize siltation.
- Collect surface water samples directly into laboratory-supplied bottles; wide-mouth bottles may be preferable to narrow mouth bottles for ease of surface water collection.
- Make sure bottle caps remain in the gloved hand of the sampler until sampling is complete and caps are replaced on the bottle.
- Note the time on the sample bottle.
- Collect any necessary duplicates and matrix spikes. As the laboratory should be analyzing the entire aqueous sample rather than sub-sampling, separate bottles will be required for these samples.
- Collect any necessary equipment blanks. The best timing to collect equipment blanks is immediately after the collection of a sample likely to contain high concentrations of PFAS, after the sampling equipment has been appropriately decontaminated.
- Collect any necessary field reagent blanks. This sample should be collected after field staff return from an offsite break (e.g., lunch) to capture any potential cross-contamination from field personnel.

### **After Sample Collection**

- Place each sample bottle in two sealed Ziploc® bags. Another brand of LDPE bag is acceptable.
- Record the label information and time of sampling in the field notes.
- Place samples in coolers that are durable in transportation and keep the temperature between 0 and 6°C until transported to the laboratory. **Do not use blue ice. Store PFAS samples in a separate cooler from other types of samples.**
- Measure surface water pH, conductivity, temperature, and TDS at each location **after** both surface water and sediment sampling.

## **8.4 Shipping**

- If samples cannot be shipped the same day as collected, arrange an appropriate means of keeping the samples cool overnight and maintain the temperature between 0 and 10°C for the first 48 hours after collection, and then between 0 and 6°C thereafter.
- Store samples in appropriate transport bottles (coolers) with ice (Ziploc® bags for use as ice containers) with appropriate labeling. **Do not use blue ice. Store PFAS samples in a separate cooler from other types of samples.**

- Complete the appropriate procedures for COC, handling, packing, and shipping.
- Fill out and check COC Forms against the labels on the sample bottles progressively after each sample is collected.
- Place all disposable sampling materials (such as plastic sheeting, and health and safety equipment) in appropriate containers.
- Ship samples via courier service with priority overnight delivery. Tracking numbers for all shipments should be provided and recorded after they have been sent out to ensure their timely delivery.
- Do not ship samples via Fed Ex for Saturday delivery.

## 9 Waste Management

All rinsate should be collected in a sealed pail for disposal. Drill cuttings and purge water will be managed as specified in the Field Sampling Plan (FSP) or Work Plan, and according to state and/or federal requirements. PPE and decontaminated fluids will be contained separately and staged at the sampling location. Containers must be labeled at the time of collection. Labels will include date, location(s), site name, city, state, and description of matrix contained (e.g., soil, groundwater, PPE). General guidelines for investigation derived waste (IDW) handling and storage are set forth in a separate IDW guidance document (Arcadis 2009).

Typical waste characterization procedures include collection of a composite sample of the drill cutting material and a composite sample of the purge water for laboratory analysis. Samples are typically analyzed for disposal toxicity characteristic leaching procedure (TCLP) analysis for metals and VOCs. For PFAS, a simple leach test with neutral pH water may be more indicative of actual risk. Additionally, generators of waste are required to include analysis of other constituents that are reasonably believed to be present including (in this case) PFAS.

Waste storage and final waste disposition should be determined in the site specific workplan.

## 10 Data Recording and Management

Digital data collection is the Arcadis standard using available FieldNow® applications that enable real-time, paperless data collection, entry, and automated reporting. Paper forms should only be used as backup to FieldNow® digital data collection and/or as necessary to collect data not captured by available FieldNow® applications. The Field Now® digital form applications follow a standardized approach, correlate to most TGIs and are available to all projects accessible with a PC or capable mobile device. Once the digital forms are saved within FieldNow®, the data is instantly available for review on a web interface. This facilitates review by project management team members and SMEs enabling error or anomalous data detection for correction while the staff are still in the field. Continual improvements of FieldNow® applications are ongoing, and revisions are made as necessary in response to feedback from users and subject matter experts.

If digital data collection isn't possible, waterproof field books should be avoided for field notes. Instead, field notes on loose paper on Masonite, plastic, or aluminum clip boards is preferred. Please note that newer Rite in the Rain® notebooks are approved for PFAS sampling. Other requirements for field notes include:

- Pens, pencils, and fine/ultra-fine point Sharpies® may be used.
- Keep field notes and writing implements away from samples and sampling materials.
- One person should conduct sampling while another records field notes.

- Do not write on sampling bottles unless they are closed.

## 10.1 Other Project Documentation

- Complete groundwater and/or soil sampling logs.
- Make sure COC Forms are properly completed. Verify which PFAS analytes (e.g., just PFOS and PFOA, some or all of the 537 list, etc.) are required for analysis and note on the COC.

## 11 Quality Assurance

Refer to quality control requirements for the project to ensure that appropriate quality assurance and quality control (QA/QC) samples are collected. When collecting QA/QC samples, the same guidelines apply as when collecting regular samples – specifically that:

- Samples should be collected in laboratory-supplied HDPE bottles;
- Bottle caps must remain in the hand of the sampler until replaced on the bottle;
- Labels must be completed after the caps have been placed back on each bottle; and
- Samples must be stored in appropriate transport bottles (coolers) with ice (Ziploc® bags for use as ice containers) with appropriate labeling. **Do not use blue ice. Store PFAS samples in a separate cooler from other types of samples.**

### 11.1 Equipment Blanks (if relevant)

QA/QC sampling typically includes daily collection of equipment blanks using the laboratory-supplied “PFAS-free” water. For peristaltic pump tubing, laboratory supplied “PFAS-free” water should be poured into a clean HDPE sample bottle and then pumped through new HDPE tubing using the peristaltic pump (with new silicone tubing). The best timing to collect equipment blanks is immediately after the collection of a sample likely to contain high concentrations of PFAS, after the sampling equipment has been appropriately decontaminated. Note that an equipment blank can also be collected if an unapproved or potentially suspect hazard control is needed for health and safety and it contacts a sample, i.e., that material would be exposed to PFAS free water then the water would be collected in a separate sample container.

### 11.2 Field Duplicates

QA/QC sampling typically includes the collection of one field duplicate for every 10 or 20 samples collected. Each duplicate sample will be collected immediately after the initial sample of which it is a duplicate into a separate laboratory-provided sample bottle. Do not indicate to the laboratory which sample the duplicate replicates, i.e., it should be given a blind reference on the COC and sample name such as “duplicate”.

### 11.3 Field Reagent Blanks

QA/QC sampling for PFAS typically includes the submission of one laboratory supplied field reagent blank per day. The field reagent blank sample is brought to the site in a laboratory-supplied sample bottle. Field staff

transfer the laboratory-supplied reagent blank to an empty sample bottle. This sample should be collected after field staff return from an offsite break (e.g., lunch) to capture any potential cross-contamination from field personnel and should be placed in the same cooler as the other PFAS samples.

## 11.4 Matrix Spikes (optional in some cases)

QA/QC sampling includes submitting a sample to be used as a matrix spike if the project requires it. If a separate sample bottle is required, an additional sample will be collected immediately after the initial sample of which it is a duplicate into a separate laboratory-supplied sample bottle.

## 11.5 Laboratory Analytical QA/QC

- Arcadis recommends that any request for PFAS analysis in groundwater or soil should be conducted by an ELAP-accredited method compliant with QSM 5.3 Table B-15. Requirements laid out in Table B-15 strictly govern acceptable laboratory data quality for PFAS analysis in environmental samples. **For all data collection efforts at DoD sites, PFAS data must be obtained using a method that is DoD ELAP-accredited under QSM 5.3 or later.**
- Laboratory QA/QC should consist of one laboratory blank and one laboratory control sample (or blank spike) per batch of samples, and additional QA/QCs as indicated by the laboratory QA/QC procedures.
- Isotope dilution should be used for quantification with isotope-labeled surrogate standards, as available, according to the guidelines of QSM 5.3 Table B-15. The USEPA has two drinking water methods (USEPA Method 537.1 and USEPA Method 533). Method 537.1 does not allow for isotope dilution but USEPA Method 533 requires isotope dilution.
- For drinking water, groundwater, and surface water samples, laboratories must extract the entire sample and include a solvent rinse of the bottle for analysis. Aqueous samples should generally not be sub-sampled prior to analysis, unless they are high concentration and require serial dilution (US DoD 2017).
- Soil samples should be analyzed in their entirety or thoroughly homogenized before extraction and analysis.
- As part of the internal QA/QC of laboratory results, relative percent difference (RPD) should be calculated between samples and corresponding field or laboratory duplicates. The laboratory quality assurance portion of the laboratory certificates should be reviewed to verify that all calculations/recoveries were within acceptable limits as established by the laboratory method and guidelines in Table B-15 of QSM 5.3 or later (USDoD 2019).

## 12 References

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